

**Appendix B** – a copy of the Appellant's submission and further submissions

**SUBMISSION ON THE PROPOSED QUEENSTOWN LAKES DISTRICT PLAN  
UNDER CLAUSE 6 OF THE FIRST SCHEDULE TO  
THE RESOURCE MANAGEMENT ACT 1991**

**To:** Queenstown Lakes District Council  
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**QUEENSTOWN 9348**

**Submitter:** Henley Downs Farm Holdings Ltd and Henley Downs Land Holdings Ltd  
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**CHRISTCHURCH**

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Henley Downs Land Holdings Ltd, Henley Downs Farm Holdings Ltd ("**Jacks Point**") makes the submissions on Stage 2 of the Proposed Queenstown Lakes District Plan ("PDP") set out in the **attached** document.

Jacks Point confirms its submission does not relate to trade competition or the effects of trade competition.

Jacks Point would like to be heard in support of its submission.

If other persons make a similar submission then Jacks Point would consider presenting joint evidence at the time of the hearing.



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**Chris Ferguson**

For and behalf of Henley Downs Farm Holdings Ltd and Henley Downs Land Holdings Ltd

23<sup>rd</sup> day of February 2018

## OUTLINE OF SUBMISSION

This submission has been structured under the following headings:

### **Section A: Overview**

### **Section B: Reasons for, and matters raised in, submission**

### **Section C: Specific Submissions to the Proposed Queenstown Lakes District Plan**

## SECTION A: OVERVIEW

1. Jacks Point are the original developers and proponents of the Jacks Point area through the creation of the Jacks Point Resort Zone under the operative District Plan. Jacks Point has worked together with the Council on the formulation of a new Jacks Point Zone (Chapter 41), including the design of a single structure plan for the wider Jacks Point area, drafting new and updated provisions, section 32 reports, specialist landscape reports, consultation and other background investigations. Hearings on submissions for Chapter 41 were completed in July 2017 with decisions from the Council pending.
2. This submission to the Stage 2 topics of the PDP generally seeks to ensure consistency in the planning approach taken within the Jacks Point Zone and to ensure proposed changes to the application of landscape categories and assessment matter, earthworks rules, transport provisions, visitor accommodation and signage integrate with the objective and methods established for this zone. Jacks Point also presented significant submissions and evidence in the course of hearings on Stage 1 of the PDP and seeks to ensure consistent outcomes through Stage 2 as presented already
3. The reasons for this submission are outlined in Section B with the specific relief being contained within Section C.

## SECTION B: REASONS FOR, AND MATTERS RAISED IN, SUBMISSION

### **Chapter 6 Landscapes**

4. The effect of the changes made to Chapter 6 are to broaden the application of the landscape provisions to apply across all zones within the PDP, inclusive of all rural and urban zones. Jacks Point opposes this change and considers the rules within Chapter 6 should be amended to clarify that the role of the objectives and policies within this chapter should not apply to the Jacks Point Zone.
5. The position with respect to the management of landscape values within Jacks Point has evolved, from the time of the drafting of the initial provisions that cross referenced Chapter 6. By the conclusion of the hearing on the special zones (Stream 13), Jacks Point had proposed a detailed policy in relation to the Peninsula Hill landscape, recognised by the experts as being within the Outstanding Natural Landscape. This policy sought to protect the character of the Peninsula Hill landscape from the adverse effects of inappropriate subdivision, use and development. The policy and related structure plan and rules provide for the protection of this landscape in specific ways, including by:
  - a) Identification of two Activity Areas designed to accommodate potential development with areas modelled as having potential to absorb change;
  - b) Elevating the protection of more sensitive parts of the landscape through a Landscape Protection overlay; and

- c) Restricting the range of permissible activities.
6. Together the provisions develop a targeted regime for protecting the landscape values in a way that is specific to the Jacks Point area and the ONL's characteristics and that implements the higher order objectives and policies from Chapter 6. In this way, the relevant Chapter 41 provisions are more relevant as a policy and assessment structure for the assessment of landscape effects within the Jacks Point Zone.
7. This is not to suggest that Chapter 6 is irrelevant, as the provisions of the Jacks Point Zone have been developed to expressly implement the outcomes relevant to the policies for the ONL. Having developed this more refined policy and rule structure, the blanket application of the Chapter 6 objectives, policies for the ONL/Peninsula Hill landscape would create unnecessary tension and uncertainty. The Jacks Point Zone was founded on the Coneburn Area Resource Study (2002), which undertook a detailed examination of the resources of the wider environment and identified areas appropriate for development based on landscape character and absorption capacity. In more general terms:
- i) The changes to Chapter 6 are not supported by any s32 analysis of the impact of this changes on urban land beyond the proposed Open Space and Recreation Zones;
  - ii) The scope of the proposed changes includes all land under the PDP regardless of landscape value. Inclusion of urban land fundamentally conflicts with the management of landscape values based on the nature of the outcomes anticipated for those zones;
  - iii) On the ground delineation of a landscape boundary using the more fine-grained landscape assessment resulting from the revised Coneburn Area Resource Study (2015) is more accurate than as shown on the planning maps; and
  - iv) There are special zones, such as the Jacks Point Zone that are located within proposed Urban Growth Boundaries and where spatial outcomes have been mapped in some detail. based on a detailed assessment of characteristics and values of the site, together with the formulation of provisions designed to implement the higher order polices relating to landscapes.

### **Earthworks**

8. The Jacks Point Zone (Chapter 41) made provision for earthworks rules within that chapter from notification. Those provisions have since undergone refinement through the hearings on that Zone. Jacks Point supports integration of the earthworks provisions into a new standalone chapter, and their subsequent extraction from Chapter 41, subject to their proper integration into the new earthworks chapter to recognise the particular requirements for the Jacks Point Zone and refinements made throughout the stage 1 hearing process.
9. Jacks Point seek a number of changes to the Earthworks Chapter to achieve the following outcomes:
- (a) A more balanced policy structure that provides for earthworks while minimising the adverse effects of such works on the environment;
  - (b) A range of minor edits to Advice Notes and Rules to improve administration and clarity of language;
  - (c) Amendments to the new standards that introduce further controls over earthworks within the Jacks Point Zone that did not otherwise apply under the proposed Jacks Point Zone (Chapter 41) or are considered unnecessary; and

- (d) Integration with the changes proposed to the Structure Plan, including the removal and changes to Activity Area within the earthworks standards (Maximum Volumes).

### **Signs**

10. The proposed new rules for Signs incorporate the Jacks Point Zone without differentiating between the amenity outcomes across the different Activity Areas. Jacks Point oppose this blanket approach and seek changes to the rules to better reflect the different amenity outcomes within Jacks Point.

### **Transport**

11. Jacks Point generally supports the objectives for the Transport Chapter 29, but seeks a number of amendments, as follows:
- a) Amending Policy 29.2.2.3 seeking to enable a lower rate of parking for residential activities to include the Jacks Point Zone Village Activity Area;
  - b) Amending Policy 29.2.3.1 relating to the Council's Land Development and Subdivision Code of Practice to remove the wording of this to "require, as a minimum" the road design standards to be met;
  - c) To review and amend the General Rules 29.33 relating to the relevant zoning of roads once they are stopped to be consistent with Chapter 37 Designations and to also cross reference the designation provisions within Chapter 37 with respect to this alternate management regime in place for QLDC roads; and
  - d) The deletion of Rule 29.4.10 High Traffic Generating Activities.

### **Visitor Accommodation**

12. Jacks Point generally supports the approach to regulate the effects of short term stays for paying visitors and guests within residential areas as this aligns with the constitutional arrangements at Jacks Point. There are however, commercial areas such as the Village, where visitor accommodation is an anticipated outcome and where further rules are unnecessary.
13. Accordingly, Jacks Point seeks changes to the new standards to ensure they only apply within the Jacks Point residential areas and not the Village, Lodge and Homesite Activity Areas.

### **Open Space and Recreation**

14. An area of Council administered reserve within the Jacks Point Zone Open Space Amenity Activity Area is proposed to be re-zoned as Informal Recreation. Jacks Point is concerned at the impact of this re-zoning on the integrity of the Structure Plan and the objective for the Jacks Point Zone, which has not been considered in assessing the proposed zone change.
15. Jacks Point oppose this change of zoning and seek to have this reserve remain as an integral part of the open space network provided for within the Jacks Point Zone and related Structure Plan.

### **Consequential Relief**

16. Jacks Point seeks to make any similar, alternative and/or consequential relief that may be necessary or appropriate to address the matters raised in this submission or the specific relief requested in this submission.

**SECTION D: SPECIFIC SUBMISSIONS TO THE PROPOSED QUEENSTOWN LAKES DISTRICT PLAN (STAGE 2 TOPICS)**

Specific Provision	Submission	Decisions Sought [New text shown <i><u>underlined bold italics</u></i> and deleted text shown as <i><del>italic strike-through</del></i> ]
<b>Chapter 6 Landscapes</b>		
6.2 Values	<p><b>Oppose</b></p> <p>Jacks Point opposes removal of the description of the values contained within 6.2, to the extent that it creates the potential for the landscape policies to apply to development located outside of the rural zone.</p>	Retain 6.2 Values, as detailed within Stage 1 of the PDP.
Rule 6.4.1.2	<p><b>Oppose</b></p> <p>Jacks Point opposes the modification to this rule that has the effect of broadening the application of the Chapter 6 landscape categories to urban land, including the Jacks Point Zone.</p> <p>The landscapes of the district have been categorised into three classifications <u>within the rural zone</u><sup>1</sup>, being the outstanding natural landscapes, outstanding natural features and the rural landscape classification. This is reflected within Policy 6.3.1.2 which establishes the policy basis for the landscape classification within the rural zone. The changes introduced through the Variation at the back of proposed Chapter 38 does not change this policy. The clarification under Rule 6.4.1.2 stating that the landscape categories apply only to the rural zone and that the landscape chapter and strategic directions chapters</p>	<p>Amend Rule 6.4.1.2, as follows:</p> <p style="padding-left: 40px;"><i><u>The classification of landscapes of the District and related objectives policies for each classification within Chapter 6 <del>landscape categories</del> apply only to the Rural Zone. The Landscape Chapter and Strategic Direction Chapter's objectives and policies are relevant and applicable in all zones where landscape values are at issue.</u></i></p>

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<sup>1</sup> 6.2, Page 6 – 2, Chapter 6, PDP - Values

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	<p>objectives and policies is a correct reflection of the structure of the unmodified policies and the proposed changes by the council conflict with this policy direction.</p> <p>Where the rule includes the term “landscape categories”, Jacks Point considers that the plan is not referring to Part 2 of the Act but rather the objectives, policies and assessment matters that apply to the three landscape classifications under the PDP. Accordingly, Jacks Point seeks that the wording of this rule could be amended to reflect that it is the classification of landscapes of the District and related objectives and policies for each classification within Chapter 6, which apply to the Rural Zone.</p>	
<p>Rule 6.4.1.3</p>	<p><b>Oppose</b></p> <p>The effect of the proposed change to Rule 6.4.1.3 it to focus the application of the rule to “assessment matters”. This is confusing because Chapter 6 does not contain any assessment matters and the only other relevant assessment would be those included within Chapter 21 Rural Zone. Chapter 22 does not have any assessment matters relevant to subdivision and development (except with respect to hazards in the Makarora Lifestyle Zone). In addition, because this rule is worded in the negative i.e. the assessment matters do not apply to the certain areas, it could be interpreted that the assessment matters do apply to all other zones, including the Jacks Point Zone, outside of those listed exemptions.</p> <p>On this basis, the effect of the proposed changes to Rule 6.4.1.3 would be to apply assessment matters for the three landscape classifications within Chapter 21 Rural</p>	<p>Amend Rule 6.4.1.3, as follows:</p> <p><u>The landscape categories classification of landscapes of the District, the related objectives policies for each classification within Chapter 6 and the landscape assessment matters within provision 21.7 (Chapter 21), do not apply to the following within the Rural Zones:</u></p> <ul style="list-style-type: none"> <li>a. Ski Area Activities within the Ski Area Sub Zones.</li> <li>b. The area of the Frankton Arm located to the east of the Outstanding Natural Landscape line as shown on the District Plan maps.</li> <li>c. The Gibbston Character Zone.</li> </ul> <p><u>For the avoidance of doubt, the Rural Zone does not include the Wakatipu Basin Rural Amenity Zone (or Precincts) (Chapter 24), <del>the Rural Lifestyle Zone or</del> <del>e-</del> the Rural Residential Zone (Chapter 22).</u></p>

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	<p>Zone to subdivision or development across all other zones, including the Jacks Point Zone. As detailed in the submission made above on Rule 6.4.1.2 the policies of chapter 6 apply the landscape classifications and related provision to the Rural Zone. The Council hasn't sought to amend these policies and the changes to this Rule would not change how the policies relating to the three landscape classifications would apply.</p> <p>Where the rule (as originally notified as part of Stage 1) includes the term "landscape categories", Jacks Point considers that the plan is not referring to Part 2 of the Act but rather the objectives, policies and assessment matters that apply to the three landscape classifications under the PDP. Accordingly, Jacks Point seeks that the wording of this rule be improved to reflect that it is the classification of landscapes of the District and related objectives and policies for each classification within Chapter 6, which apply to the Rural Zone</p> <p>In order to remain consistent with the policies, Jacks Point submits that the Rule should also be amended to clarify that the Rural Zone is just that and does not include the rural lifestyle zone and the rural residential zones (Chapter 22) or the recently notified Wakatipu Basin Rural Amenity Zone (Chapter 24).</p>	
<b>Chapter 25 Earthworks</b>		
Policy 25.2.1.2	<p><b>Oppose</b></p> <p>Jacks Point are opposed to the proposed wording of this policy seeking to "protect" the listed resources as it is</p>	Amend Policy 25.2.1.2, as follows:



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	overly restrictive and conflicts with the objective to minimise adverse effects.	<p><del>Protect</del> <u><b><i>Minimise the adverse effects of earthworks on the following valued resources including those that are identified in the District Plan from the inappropriate adverse effects of earthworks:</i></b></u></p> <ul style="list-style-type: none"> <li>a. Outstanding Natural Features and Landscapes;</li> <li>b. the amenity values of Rural Landscapes and other identified amenity landscapes;</li> <li>c. significant Natural Areas and the margins of lakes, rivers and wetlands;</li> <li>d. the exposure of aquifers, in particular the Wakatipu Basin, Hāwea Basin, Wanaka Basin and Cardrona alluvial ribbon aquifers;</li> </ul>
Policy 25.2.2.1	<p><b>Oppose</b></p> <p>Jacks Point oppose prefacing this policy with “subject to Objective 25.2.5.1” as it has the effect of undermining the significance of social and economic wellbeing and the community benefits of earthworks and the appropriate balancing of provisions.</p>	<p>Amend Policy 25.2.2.1, as follows:</p> <p><del>Subject to Objective 25.2.1, e</del><u><b><i>Enable earthworks that are necessary to provide for people and communities wellbeing, having particular regard to the importance of:</i></b></u></p> <p>...</p>
25.3.3 Advice Notes  25.3.1	<p><b>Support in Part</b></p> <p>Jacks Point support in part the inclusion of this Advice Note to clarify how the volume of earthworks is calculated. It is suggested that as earthworks are a dynamic process during construction phase, it would be assist in the understanding of the rule if volume was calculated at the completion of such work.</p>	<p>Amend Advice Note 25.3.3.1, as follows:</p> <p><i>Volume shall mean the sum of all earth that is moved within a site and includes the total of any combined cut and fill, <u>measured at the completion of that work.</u> Refer to Interpretive Diagrams 25.1 to 25.3 located within Schedule 25.9.</i></p>
Advice Note 25.3.3.3	<p><b>Support in Part</b></p>	<p>Amend Advice Note 25.3.3.3, as follows:</p>

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	Jacks Point supports the meaning of this Advice Note and suggests a minor wording change to better express its meaning.	<i>Refer to Chapter 33 Indigenous Vegetation and Biodiversity for land disturbance activities within Significant Natural Areas. <del>The provisions of this chapter do not prevail over those of Chapter 33 Indigenous Vegetation and Biodiversity.</del></i>
Advice Note 25.3.3.4	<p><b>Support in Part</b></p> <p>Jacks Point supports the meaning of this Advice Note and suggests a minor wording change to better express its meaning.</p>	<p>Amend Advice Note 25.3.3.4, as follows:</p> <p><i>Earthworks are also managed as part of development activities and modifications to Historic Heritage items and settings identified on the Planning Maps and in Chapter 26 Historic Heritage. <del>The provisions of this chapter do not prevail over those of Chapter 26 Historic Heritage.</del></i></p>
Advice Note 25.3.3.11	<p><b>Support in Part</b></p> <p>Jacks Point supports the meaning of this Advice Note and suggests a minor wording change to better express its meaning.</p>	<p>Amend Advice Note 25.3.3.11, as follows:</p> <p><i><u>The provision of this chapter do not apply to</u> <del>are</del> the following activities managed in Chapter 30 Energy and Utilities:</i></p> <p>...</p>
25.3.4 General Rule 25.3.4.1	<p><b>Support in Part</b></p> <p>Jacks Point supports this rule in part, but considers that it should be broadened to apply to all subdivision, not just subdivision that is a controlled or restricted discretionary activity. Changes to the structure of the rule are also proposed as earthworks are not “subject to” subdivision consent, being the very point of the rule. It is suggested instead that “earthworks associated with subdivision” be exempt.</p>	<p>Amend Rule 25.3.4.1, as follows:</p> <p><i>Earthworks <u>associated with</u> <del>subject to resource consent applications for Controlled or Restricted Discretionary activity</del> subdivisions pursuant to section 11 of the Act <u>and the provisions of Chapter 27, shall bear:</u></i></p> <p><i>i) exempt from the following Rules:</i></p> <ul style="list-style-type: none"> <li><i>a. Table 25.2 volume;</i></li> <li><i>b. Rule 25.5.16 cut; and</i></li> <li><i>c. Rule 25.5.17 fill.</i></li> </ul>

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		<p><i>ii) Applications for subdivision involving any earthworks shall be considered against the matters of discretion for earthworks in Part 25.7 and assessment matters in Part 25.8.</i></p> <p><i>All other rules in the Earthworks Chapter apply to applications for subdivision consent.</i></p>
General Rule 25.3.4.3	<p><b>Support in Part</b></p> <p>Jacks Point support the intent of this rule and proposed a change to align with the outcome of the hearing on Chapter 41 Jacks Point Zone, where it was proposed after questions from the Panel to enable volume and areas of earthworks to be calculated across “any” consecutive 12 month period, rather than only “one” 12 month period.</p>	<p>Amend Rule 25.3.4.3, as follows:</p> <p><i>The maximum volume and area of earthworks shall be calculated per <u>sSite</u>, within <del>one</del> <u>any</u> consecutive 12 month period</i></p>
<p>Table 25.2 Maximum Volumes</p> <p>Rule 25.8</p> <p>Rule 25.5.9</p> <p>Rule 25.5.10</p>	<p><b>Support in Part</b></p> <p>Jacks Point seek changes to ensure the volume triggers provided for in Rules 25.5.8, 25.5.9 and 25.5.10 are consistent with and integrate with the positions advanced by Jacks Point at the stage 1 hearing for Chapter 41.</p>	<p>(a) Amend Rule 25.5.8 to remove the Village</p> <p>(b) Amend Rule 25.5.9 to remove Farm Preserve 1 and 2 and amend Homesite to refer to “Preserve Homesite”</p> <p>(c) Amend Rule 25.5.10 to remove “Education” and “Education Innovation Campus” and add in the “Village”</p> <p>(d) Any further consequential changes to the maximum volume triggers to integrate final activity areas arising from decisions on the Stage 1 hearing for the Jacks Point Zone (Chapter 41).</p>
Rule 25.5.11	<p><b>Oppose</b></p> <p>Jacks Point opposes the inclusion of the Jacks Point Zone within the area thresholds and seek to exempt this zone from the rule to be consistent with the approach taken within Chapter 41.</p>	<p>Amend Rule 25.5.11 to add the following statement:</p> <p><u><i>Except this rule shall not apply within the Jacks Point Zone (Chapter 41).</i></u></p>

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Rule 25.5.12	<p><b>Oppose</b></p> <p>Jacks Point oppose non-complying activity status for a breach of this rule, which is considered able to be appropriately managed as a restricted discretionary activity. In addition, non-complying activity status does not follow from the wording of the relevant policies.</p>	Amend Rule 25.5.12 to change the status of non-compliance to restricted discretionary.
Rule 25.5.13	<p><b>Oppose</b></p> <p>Jacks Point oppose non-complying activity status for a breach of this rule, which is considered able to be appropriately managed as a restricted discretionary activity. In addition, non-complying activity status does not follow from the wording of the relevant policies.</p>	Amend Rule 25.5.13 to change the status of non-compliance to restricted discretionary
Rule 25.5.15	<p><b>Support</b></p> <p>Jacks Point supports the intent of this rule to establish a permissive approach for managing accidental discovery, archaeological sites and contaminated land through the relevant legislation applying to these matters and not as a separate rule trigger.</p>	No changes
Rule 25.5.18	<p><b>Support in Part</b></p> <p>Jacks Point is unclear whether access ways are intended to capture roads, including roads created through subdivision and seeks changes to ensure roads to vest or private roads are exempt from this rule. The reasons being that their effects are appropriately managed through</p>	<p>Amend Rule 25.5.18, as follows:</p> <p style="padding-left: 40px;"><i>Earthworks for farm tracks and access ways, <u>but not roads vest or private road created by subdivision consent, in the following Zones and Activity Area shall comply with rules (a) to (c).</u></i></p>

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	the broader consideration of subdivision works and the other standards within this chapter.	
Rule 25.5.20	<p><b>Oppose</b></p> <p>Jacks Point oppose the introduction of a new 10m setback for all earthworks from the bed of any water body. In relation to water bodies the operative earthworks rules and those proposed within the Jacks Point Zone (Chapter 41) provide for 20m<sup>3</sup> of earthworks within 7m of a water body. The 7m setback is also consistent with rules within the Otago Regional Water Plan. No assessment has been made to justify this departure. Jacks Point seek to change the rule to retain the ability to undertake 20m<sup>3</sup> of earthworks within 7m of a waterbody.</p>	<p>Amend Rule 25.5.20, as follows:</p> <p><i>Earthworks <u>greater than 20m<sup>3</sup> in volume</u> shall be setback a minimum distance of <del>40</del> <u>7</u> metres from the bed of any water body:</i></p> <p>...</p>
Rule 25.5.22 Cleanfill	<p><b>Oppose</b></p> <p>It is unclear how this rule is intended to operate when all earthworks to operate a Cleanfill are listed as a discretionary activity through Rule 25.4.3</p> <p>Jacks Point support establishing a trigger for Cleanfill and the</p>	Delete this rule or otherwise amend to relate to Rule 25.4.3.
Schedule 25.10 Accidental Discovery Protocol	<p><b>Support</b></p> <p>Jacks Point supports the addition of an accidental Discovery Protocol into the PDP, in the event its wording has been agreed to by the relevant agencies and Mana Whenua.</p>	

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Definition of Earthworks	<p><b>Oppose</b></p> <p>Jacks Point oppose the addition of cleanfill into the definition of earthworks on the basis that Cleanfill is separately defined and supplemented by a separate discretionary activity rule regardless of volume.</p>	Amend the definition of Earthworks to remove the deposition and removal of Cleanfill.
<b>Chapter 29 Transport</b>		
Objective 29.2.1	<p><b>Support in Part</b></p> <p>Jacks Point supports in part the objective insofar as it provides for an integrated, safe and efficient transport network that reduces the dominance of congestion of vehicles. Jacks Point submits that the reduction of dominance and congestion of vehicles would not necessarily be confined to the Town Centre Zones and on this basis, seeks to amend the objective to remove this qualification.</p>	Amend Objective 29.2.1 to remove the words “in the Town Centre zones” from the end of the last bullet.
Policy 29.2.2.3	<p><b>Support in Part</b></p> <p>Jacks Point supports the direction of this policy seeking to enable a lower rate of parking to be provided for residential flats, district wide, and for residential activities in the Town Centre, mixed Business Use, High Density Residential and Medium Density Residential Zone compared to other zones. Jacks Point submits that the Village Activity Area is zoned to provide a comparable density and character to the urban environment listed within the policy and Jacks Point seeks to amend the policy to include this area.</p>	<p>Amend Policy 29.2.2.3, as follows:</p> <p style="padding-left: 40px;"><i>Enable a lower rate of accessory parking to be provided for residential flats district wide, and for residential activity in the Town Centre, Business Mixed Use, High Density Residential, <del>and</del> Medium Density Residential zones <u>and the Village Activity Area within the Jacks Point Zone</u> compared to other zones to support intensification and in recognition of the accessibility and anticipated density of these zones.</i></p>

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Policy 29.2.2.5	<p><b>Support</b></p> <p>Jacks Point supports having a policy framework enabling a reduction in the number of car parking spaces.</p>	Retain Policy 29.2.2.5
Policy 29.2.3.1	<p><b>Oppose</b></p> <p>Jacks Point opposes the wording of this policy to “require, as a minimum” road designs in accordance with the Councils Land Development and Subdivision Code of Practice (2015). Jacks Point submits that environmental factors and urban design considerations may justify a lesser standard of road design than that prescribed in the Code. The Council's Land Development and Subdivision Code is an adaptation of New Zealand Standard 4404:2010. Section 3 of this standard explicitly states that the tables within Section 3 are the basis for road design and that alternative carriageway widths may be adopted to suite particular design considerations, subject to specific consideration and approval by the TA. Adherence to the design standards “as a minimum” is therefore inconsistent with the wording of the Council Code and is not supported in the assessment framework anticipated within that document. Jacks Point seeks to amend the wording of this policy to adopt the Land Development and Subdivision Code of Practice as the basis for road design.</p>	<p>Replace Policy 29.2.3.1 with the following:</p> <p><u><i>Adopt the QLDC Land Development and Subdivision Code of practice (2015) as the basis for road design within the District.</i></u></p>
Policy 29.2.4.1	<p><b>Support</b></p> <p>Jacks Point supports this policy seeking to avoid commercial activities and home occupations in residential areas. Jacks Point supports residential areas such as</p>	Retain Policy 29.2.4.1

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	within Jacks Point as having policy support to ensure roads congested through commercial activity.	
29.3.3 General Rule  Rule 29.3.3.2	<b>Support in Part</b>  Jacks Point supports in part the PDP setting out a process for application of the relevant zoning to road once it has been stopped. There is however a similar but different process for this set out within Chapter 37 A. Road (Page37-30). Jacks Point seeks to simply have one consistent process.	Review and amend Rule 29.2.3.2 as it relates to the zoning of stopped road to be consistent with the process established within Chapter 37 A. Road.
29.3.3. General Rules	The general rules do not recognise that all QLDC roads are designated and are subject to the provisions of s176 of the Act.	Add a new general rule cross referencing to Chapter 37, to identify that all QLDC roads are designated and subject to the provisions of s176 of the Act, which provide that s9(3) does not apply to a project or work by the requiring authority; and no person may, without the prior written consent of the requiring authority, to anything in relation to that land that is subject to the road designation preventing or hindering a public project or work.
Rule 29.4.10 High Traffic Generating Activities	<b>Oppose</b>  Jacks Point oppose the introduction of a blanket rule relating to high traffic generating activities, as that assessment should be incorporated into the rules relating to activities within the relevant zone, including throughout the specific matters of control or discretion. In addition, the wording of the rule includes subdivision, which Jacks Point submits does not allow for an assessment of the actual traffic demands that would result from the eventual land uses. Jacks Point also notes that the reference in the rule to table 29.6 appears incorrect.	Delete Rule 29.4.10



Specific Provision	Submission	Decisions Sought [New text shown <u><i>underlined bold italics</i></u> and deleted text shown as <i>italic strike-through</i> ]
<b>Chapter 27 Subdivision</b>		
Rule 27.3.2.1 Earthworks associated with subdivision	<p><b>Support in Part</b></p> <p>Jacks Point generally supports the addition of a cross reference to the earthworks rule within Chapter 25 but consider that this should be expanded to be made clearer and to follow the approach taken with Rule 25.3.4.1.</p>	<p>Amend Rule 27.3.2.1 [Rule 27.4.2.1 Revised Proposal], as follows</p> <p style="text-align: center;"><i>Earthworks undertaken for the development of land associated with any subdivision <u>are subject to certain standards of the Earthworks Chapter, including shall be considered against the matters of control or discretion from that chapter of the District Wide Earthworks Chapter as part of any subdivision activity and in particular Rule 15.2.20. Refer to Rule 25.3.4.1 (Chapter 25).</u></i></p>
<b>Chapter 31 Signs</b>		
Rule 31.9.5	<p><b>Oppose</b></p> <p>Jacks Point opposes the restrictions proposed over the number and areas of signs within the Jacks Point Zone. In particular, the standards fail to differentiate between the amenity expectations between the various activity areas. The residential activity areas should be subject to standards for signs proposed in the residential areas (Table 31.8) and the Village subject to the standards proposed for signs within commercial areas (Table 31.7) and the Town Centre Zone.</p>	<p>Amend all rules applying to the Jacks Point Zone such that the Residential Activity Areas are subject to the standards proposed for Residential areas (table 31.8); and the Village Activity area be subject to the standards proposed for the Town Centres Zones/Commercial Areas (Table 31.7).</p>
<b>Chapter 41 Jacks Point Zone</b>		

Specific Provision	Submission	Decisions Sought [New text shown <u><b><i></i></b></u> and deleted text shown as <del><i></i></del> ]
<p>Definition of Visitor Accommodation</p>	<p><b>Support in Part</b></p> <p>Jacks Point supports in part the proposed restrictions on short stay visitor accommodation within residential units and residential flats within Jacks Point. It is however concerned with the impacts of the new rules and changes to the definition of Visitor Accommodation on such accommodation within certain parts of the Jacks Point Zone that anticipate and provide for both residential and visitor accommodation.</p> <p>The Visitor Accommodation variation proposes to amend the definition of Visitor Accommodation to exclude residential units and residential flats from that definition and is coupled with the introduction of an additional definition of Residential Visitor Accommodation, which is designed to capture short term stays of guests not exceeding 90 within a residential unit or a residential flat.</p> <p>The standards proposed to be applied to the Jacks Point Zone will mean that any Residential Unit used for short term visitor accommodation and falling within the definition Residential Visitor Accommodation will become a non-complying activity where it exceeds the specified standards for up to 3 lets not exceeding a total of 28 nights per year and the two vehicle trip trigger.</p> <p>Jacks Point are concerned about the change to the definition of Visitor Accommodation, coupled with the new definition of Residential Visitor Accommodation and the application of standards to areas of the Jacks Point zone that anticipate and provide for visitor accommodation, such as the Village, Lodge and Homesite Activity Areas.</p>	<p>Reinstate the definition of Visitor Accommodations as to include any residential unit or residential flat.</p>

Specific Provision	Submission	Decisions Sought [New text shown <u><b><i></i></b></u> and deleted text shown as <del><i></i></del> ]
	<p>The combined changes would result in visitor accommodation within these areas being a permitted or controlled activity with the use of a residential unit for a similar purpose becoming a non-complying activity.</p> <p>Jacks Point submits that such an outcome is perverse when a building within certain parts of the zone could be erected for pure visitor accommodation purposes without having the dual purpose of being a residential unit, and be permitted or controlled. The dual use of residential units for visitor accommodation within areas that provide for visitor accommodation is considered a practical outcome providing an efficient utilisation of the land resource and ultimately having the flexibility to adapt over time.</p> <p>On this basis, Jacks Point seeks to delete the proposed additions to the definition of Visitor Accommodation excluding the use of a residential unit or residential flat. Jacks Point considers that for those areas where visitor accommodation is not provided for, the use of residential units or residential flats for visitor accommodation can be otherwise addressed within the rules and standards relevant to that Zone or part of the Zone.</p>	
Rule 41.4.18.1 Residential Visitor Accommodation and Homestays	<p><b>Support in Part</b></p> <p>Jacks Point generally supports the addition of rules within the Jacks Point residential areas to regulate the effects of short term stays for paying visitors and guests. There are however areas within the Jacks Point Zone, such as the Village, Lodge and Homesite Activity Areas, where visitor accommodation is anticipated and provided for and where further regulation is unnecessary. The change to the</p>	Amend Rule 41.4.18.1 to exclude the Village (V), Lodge (L) and Homesite (HS) Activity Areas.

Specific Provision	Submission	Decisions Sought [New text shown <u><b><i></i></b></u> and deleted text shown as <del><i></i></del> ]
	<p>definition of Visitor Accommodation and the addition of a new definition of Residential Visitor Accommodation would have the effect of visitor accommodation being provided for within these parts of the zone but not residential visitor accommodation. This anomaly makes no resource management sense. Accordingly, Jacks Point seeks to amend this rule to exclude the Village, Lodge and homesite Activity Areas.</p>	
<p>Rule 41.5.20</p>	<p><b>Oppose</b></p> <p>Jacks Point oppose the addition of standards relating to the use of Residential units or Residential Flats for short term guest stays within those parts of the Jacks Point Zone that anticipate and provide for visitor accommodation, including the Village, Home Sites and Lodge Activity Areas.</p> <p>The changes proposed to the definition of Visitor Accommodation, coupled with the new definition of Residential Visitor Accommodation mean that the proposed standards within Rule 41.5.50 would apply to areas of the Jacks Point zone that anticipate and provide for visitor accommodation, such as the Village, Lodge and Homesite Activity Areas. The combined changes would result in visitor accommodation within these areas being a permitted or controlled activity with the use of a residential unit for a similar purpose becoming a non-complying activity.</p> <p>Jacks Point submits that such an outcome is perverse when a building within certain parts of the zone could be erected for pure visitor accommodation purposes without</p>	<p>Amend Rule 41.5.20 to exempt Residential Visitor Accommodation within the Village (V), Home site (HS) and Lodge (L) Activity Areas from these standards.</p>

Specific Provision	Submission	Decisions Sought [New text shown <u><b><i></i></b></u> and deleted text shown as <i><del>strike-through</del></i> ]
	<p>having the dual purpose of being a residential unit, and be permitted or controlled. The dual use of residential units for visitor accommodation within areas that provide for visitor accommodation is considered a practical outcome providing an efficient utilisation of the land resource and ultimately having the flexibility to adapt over time.</p> <p>On this basis, Jacks Point seeks to amend Rule 41.5.20 to exclude the Village, Lodge and Homesite Activity Areas.</p>	
Rule 41.5.21 Standards for Homestays	<p><b>Oppose</b></p> <p>Jacks Point oppose the addition of standards relating to the use of Residential units or Residential Flats for short term guest stays within those parts of the Jacks Point Zone that anticipate and provide for visitor accommodation, including the Village, Home Sites and Lodge Activity Areas.</p> <p>The changes proposed to the definition of Visitor Accommodation, coupled with the new definition of Residential Visitor Accommodation mean that the proposed standards within Rule 41.5.50 would apply to areas of the Jacks Point zone that anticipate and provide for visitor accommodation, such as the Village, Lodge and Homesite Activity Areas. The combined changes would result in visitor accommodation within these areas being a permitted or controlled activity with the use of a residential unit for a similar purpose becoming a non-complying activity.</p> <p>Jacks Point submits that such an outcome is perverse when a building within certain parts of the zone could be</p>	Amend Rule 41.5.21 to exempt Residential Visitor Accommodation within the Village (V), Home site (HS) and Lodge (L) Activity Areas from these standards.

Specific Provision	Submission	Decisions Sought [New text shown <u><b><i>underlined bold italics</i></b></u> and deleted text shown as <del><i>italic strike-through</i></del> ]
	<p>erected for pure visitor accommodation purposes without having the dual purpose of being a residential unit, and be permitted or controlled. The dual use of residential units for visitor accommodation within areas that provide for visitor accommodation is considered a practical outcome providing an efficient utilisation of the land resource and ultimately having the flexibility to adapt over time.</p> <p>On this basis, Jacks Point seeks to amend Rule 41.5.21 to exclude the Village, Lodge and Homesite Activity Areas.</p>	
<b>Planning Maps</b>		
<p>Planning Map 41 – Jacks Point and Hanley Downs</p>	<p><b>Oppose</b></p> <p>The changes proposed to Planning Map 41 are to re-zone Reserve land administered by the Council located on Maori Jack Road from Jacks Point Zone to Informal Recreation.</p> <p>This land is also included within the Structure Plan for the Jacks Point Zone and is located within the Open Space Amenity (OSA) Activity Area. A consequence of the re-zoning, this land would be removed from the ambit of the Structure Plan.</p> <p>Jacks Point are opposed to this outcome for the reasons that it would fail to achieve the objective for the Jacks Point zone of having an integrated community within a framework of open space and recreation amenities. It would also compromise in part the purpose of the structure plan to establish the spatial layout of development within the Zone.</p>	<p>Delete the area of Informal Recreation Zone proposed on Planning Map 41 and retain as part of the Jacks Point Zone</p>

17. Jacks Point opposes the Variations and Stage 2 chapters in their entirety if the deficiencies identified in this submission are not addressed, and seeks that the Stage 2 Variations and Chapters be declined in the event the deficiencies are not addressed.
18. Jacks Point seeks any other consequential or other changes / relief as necessary or appropriate in order address the issues raised in this submission

**FURTHER SUBMISSION ON THE PROPOSED QUEENSTOWN LAKES DISTRICT PLAN  
UNDER CLAUSE EIGHT OF THE FIRST SCHEDULE TO  
THE RESOURCE MANAGEMENT ACT 1991**

**To:** Queenstown Lakes District Council  
Private Bag 50072  
**QUEENSTOWN 9348**

**Submitters:** Jacks Point Residential No. 2 Limited  
Jacks Point Village Holdings Limited  
Jacks Point Developments Limited  
Jacks Point Land Limited  
Jacks Point Land No. 2 Limited  
Jacks Point Management Limited  
Henley Downs Land Holdings Ltd  
Henley Downs Farm Holdings Ltd  
Coneburn Preserve Holdings Limited  
Willow Pond Farm Limited

C/- Boffa Miskell Ltd  
PO Box 110  
**CHRISTCHURCH**

Attention: Chris Ferguson, Planner  
Phone: (03) 353 7568  
Mobile: 021 907 773  
Email: Chris.Ferguson@boffamiskell.co.nz

Jacks Point Residential No. 2 Limited, Jacks Point Village Holdings Limited, Jacks Point Developments Limited, Jacks Point Land Limited, Jacks Point Land No. 2 Limited, Jacks Point Management Limited, Henley Downs Land Holdings Ltd, Henley Downs Farm Holdings Ltd, Coneburn Preserve Holdings Limited and Willow Pond Farm Limited ("**Jacks Point**") makes further submissions on Stage 2 of the Proposed Queenstown Lakes District Plan as set out in the **attached** document.

Jacks Point confirms it is a person who is representing a relevant aspect of the public interest, and has an interest in the proposal that is greater than the interest the general public has (it is affected by the content of a submission).

Jacks Point wishes to be heard in support of its further submission.

If other persons make a similar further submission then Jacks Point would consider presenting joint evidence at the time of the hearing.

A copy of this further submission has been served on the original submitters to which this further submission relates.





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**Chris Ferguson**

For and behalf of Jacks Point Residential No. 2 Limited, Jacks Point Village Holdings Limited, Jacks Point Developments Limited, Jacks Point Land Limited, Jacks Point Land No. 2 Limited, Jacks Point Management Limited, Henley Downs Land Holdings Ltd, Henley Downs Farm Holdings Ltd, Coneburn Preserve Holdings Limited and Willow Pond Farm Limited.

27<sup>th</sup> day of April 2018

**FURTHER SUBMISSIONS**

The submission supported or opposed is:	The particular parts of the submissions supported or opposed are:	Support or Oppose	The reasons for support of opposition are:
Ian Dee (#2327) PO Box 247 Cromwell <a href="mailto:ianrdee@gmail.com">ianrdee@gmail.com</a>	Chapter 25 Earthworks, Policy 25.2.2 (Submission point 2327.1)	Oppose	Jacks Point agrees with the sentiment of this submission, in that activities should not be allowed to destruct soil. Objective 25.2.2 is focussed on the human (social, cultural and economic wellbeing) outcomes to be gained from earthworks and it is not a territorial local authority function to control the use of land for soil conservation purposes (refer s30(1)(c)(i)). Jacks Point supports the notified version of Objective 25.2.2.
Department of Conservation (#2242) Private Bag 4715 Christchurch 8140 <a href="mailto:hfamilyton@doc.govt.nz">hfamilyton@doc.govt.nz</a>	Chapter 25 Earthworks, Objective 25.2.1 (Submission point 2242.12)	Oppose	Jacks Point opposes the suggested amendment to Objective 25.2.1 seeking to avoid adverse effects of earthworks on ONF/Ls, significant natural areas, wetland, and the margins of lake and rivers. This change elevates protection and is inconsistent with s.6 which seeks to protect ONF/Ls from the adverse effects of inappropriate subdivision, use or development.
	Chapter 25 Earthworks, Assessment Matters 25.8.6 - Effects on water bodies, ecosystem services and indigenous biodiversity (submission point 2242.16)	Oppose	Avoidance of adverse effects as part of this assessment matter is opposed as being inconsistent with the relevant objectives and policies and imposes a significant barrier for subdivision, use or development within SNAs.
	Chapter 31 Signs, 31.2.1 - Objective 1 (Submission point 2242.9)	Support	Jacks Point supports the proposed change to this objective as better reflecting s7 of the Act
	Chapter 31 Signs, Policy 31.2.1.5(a) (Submission point 2242.1)	Support	Jacks Point supports the additions to this policy that seek to improve knowledge of public access provisions to public spaces.
	Chapter 31 Signs, additional advice note to Rule 31.4.2 g) (submission point 2242.11)	Support/Oppose	Jacks Point support the changes sought to this provisions in part so far as it provides an exception for land uses consistent with the listed conservation act strategies and plans. Jacks Point oppose inclusion of a subjective reference to significant adverse effects as that qualifier cannot be objectively measured to determine compliance.

The submission supported or opposed is:	The particular parts of the submissions supported or opposed are:	Support or Oppose	The reasons for support of opposition are:
Heritage New Zealand (#2446) PO Box 5467 Dunedin 9058 <a href="mailto:jodea@heritage.org.nz">jodea@heritage.org.nz</a>	Chapter 25 Earthworks, Rule 25.4.5 (submission point 2446.9)	Support	Jacks Point supports the intent of the proposed changes in the event they continue to narrow the range of control and improve certainty.
	Chapter 25 Earthworks, new rule within Table 25.1 (submission point 2446.1)	Oppose	Jacks Point supports in part the addition of a new rule controlling earthworks within the setting/curtilage/extent of any building structure or feature listed in Schedule 26.9, but considers that the proposed wording leaves considerable uncertainty to determine compliance. Further, Jacks Point considers an exemption should be introduced where an archaeological authority is obtained.
	Chapter 25 Earthworks, Rule 25.5.15 (Submission point 2446.13)	Oppose	Jacks Point oppose the changes sought to this rule having the effect of making earthworks where an archaeological authority as requiring resource consent. Jacks Point considers this change inefficient.
Otago Fish and Game Council (#2455) PO Box 76 Dunedin 9016 <a href="mailto:n.paragreen@fish_game.org.nz">n.paragreen@fish_game.org.nz</a>	Chapter 25 Earthworks, Rule 25.7, matter of discretion 25.7.1 (e) (Submission point 2455.18)	Oppose	Jacks Point considers that an additional assessment matter to specifically address the habitat of trout and salmon would better provide for the concerns raised by Fish and Game and the requirements of s7(h) of the Act.
	Chapter 25 Earthworks, 25.8.6 - Effects on water bodies, ecosystem services and indigenous biodiversity (Submission point 2455.19)		Jacks Point considers that additional assessment matter to specifically address the habitat of trout and salmon would better provide for the concerns raised by Fish and Game and the requirements of s7(h) of the Act
Te Anau Developments Ltd (#2494) C/- John Edmonds + Associates Ltd <a href="mailto:Ben@jea.co.nz">Ben@jea.co.nz</a>	Chapter 25 Earthworks, Rule 25.4 - Amend Rule 25.4.5 so that archaeological sites managed by other legislation are not covered by the Earthworks rules. (Submission point 2494.18)	Support	Jacks Point supports changes to the rule so that archaeological sites managed by other legislation are not covered by the Earthworks rules. A blanket listing of such activities as being discretionary conflicts with the approach taken within Rule 25.5.15 and its link to 25.10 Accidental Discovery, which sets out a path for such activities to commence once the relevant statutory authorities have been obtained.
Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki, Te Runanga o Otakou, Hokonui Runanga, Te Runanga o	Chapter 29 Earthworks – reference to wāhi tūpuna mapped areas. (Submission Point 2329.1)	Support	Jacks Point generally supports the identification of wāhi tupuna, however cannot properly assess the impact of the proposed changes to the earthworks rules until this work has been completed (indicated as being

The submission supported or opposed is:	The particular parts of the submissions supported or opposed are:	Support or Oppose	The reasons for support of opposition are:
Waihopai, Te Runanga o Awarua and Te Runanga o Oraka-Aparima (Kai Tahu) (#2329)  PO Box 446 Dunedin 9054  <a href="mailto:maree@aukaha.co.nz">maree@aukaha.co.nz</a>			through Stage 3). Jacks Point suggest that changes to the earthworks provisions occur at the same time as mapping of wāhi tupuna occurs.
Luise Lockwood (#2184)  6 Baird Lane Bendemeer Queenstown 9371  <a href="mailto:Luise.marris@gmail.com">Luise.marris@gmail.com</a>	Chapter 31 – Signs (submission point 2184.2)	Oppose	Jacks Point considers the scale of signs related to commercial development should be determined by the sensitivity of the receiving environment and the amenity values expected for those areas and not through a blanket reduction.
Real Journeys Ltd (#2466)  C/- John Edmonds + Associates Ltd  <a href="mailto:Ben@jea.co.nz">Ben@jea.co.nz</a>	Chapter 31 – Signs (submission point 2466.1)	Support	Jacks Point supports recognition within the Signs chapter of signage needing to be conspicuous.
	Chapter 31 – Signs (submission point 2466.11)	Support	Jacks Point supports amendments to the signage rules to make signs a permitted activity where they are not visible from a public place or a neighbouring property.
Tony MacColl, On Behalf of NZ Transport Agency (#2538)  PO Box 5245 Moray Place Dunedin 9058  <a href="mailto:tony.maccoll@nzta.govt.nz">tony.maccoll@nzta.govt.nz</a>	Chapter 31 Signs, Objective 31.2.6 (Submission point 2538.94)	Oppose	Jacks Point oppose the changes sought to Objective 31.2.6. discouraging off-site signage. Off-site signage may be appropriate in some situations and the notified policy appropriately recognises this.
	Chapter 31 Signs, Rules – General Standards (Submission Point 2538.102)	Oppose	Jacks Point oppose the new Rule for signs adjacent to State Highways, to the extent the suggested rule fails to quantify the distance of any "adjacent" sign needs to be to be captured by the rule.
Chorus (#2194)  PO Box 25-289 Christchurch 8144  <a href="mailto:matthew@incite.co.nz">matthew@incite.co.nz</a>	Chapter 31 Signs, Rule 31.5.14 (submission point 2194.2)	Support	Jacks Point supports deletion of the rule listing hoardings, including hoardings located above roads as a prohibited activity. Such status is unnecessary and not justified on the level of effects likely to arise.

The submission supported or opposed is:	The particular parts of the submissions supported or opposed are:	Support or Oppose	The reasons for support of opposition are:
Queenstown Trails Trust (#2575) C/- John Edmonds & Associates Ltd <a href="mailto:hayley@jea.co.nz">hayley@jea.co.nz</a>	Chapter 31 Signs, Rule 31.5.23 (Submission Point 2575.15)	Support	Jacks Point supports the amendments proposed to Rule 31.5.23 including pedestrian and cycle trail signs within the list of permitted activities.
	Chapter 31 Signs, Rule 31.5.23 (a) (Submission Point 2575.16)	Support	Jacks Point supports the amendments proposed to Rule 31.5.23(a) including pedestrian and cycle trail signs within the list of permitted activities
Millbrook Country Club (#2295) C/- John Edmonds & Associates Ltd <a href="mailto:hayley@jea.co.nz">hayley@jea.co.nz</a>	Chapter 31 Signs, Rule 31.9.5(a) (Submission Point 2295.9)	Support	Jacks Point supports the changes sought to Rule 31.9.5 (a) to refer to buildings rather than businesses.
	Chapter 31 Signs, Rule 31.9.8 (Submission Point 2295.1)	Support	Jacks Point supports the changes sought to Rule 31.9.8 to enable signage and necessary signage platforms associated with visitor accommodation activities within the Millbrook Resort Zone to be referred to as a permitted activity. Jacks Point falls within the same rule and considers this amendment appropriate and beneficial for Jacks Point as well.
	Chapter 31 Signs, Rule 31.9.9 (Submission Point 2295.11)	Support	Jacks Point supports the changes sought to Rule 31.9.9 to enable signage and necessary signage platforms associated with visitor accommodation activities within the Millbrook Resort Zone to be referred to as a permitted activity. Jacks Point falls within the same rule and considers this amendment appropriate and beneficial for Jacks Point as well.
Cardrona Alpine Resort Limited (#2492) C/- John Edmonds + Associates Ltd <a href="mailto:Ben@jea.co.nz">Ben@jea.co.nz</a>	Chapter 29 Transport, Policy 29.2.1.3 (Submission point 2492.34)	Support	Jacks Point supports deletion of Policy 29.2.1.3, consistent with the relief sought in the primary submission by Jacks Point to delete Rule 29.4.10 High Traffic Generating Activities.
	Chapter 29 Transport, Policy 29.2.2.3 (Submission point 2492.37)	Support	Jacks Point support in part the intent of the proposed changes to enable lower rates of accessory parking, which does not necessarily need to be tied to specific zones, but rather related to circumstances where any zone can and should support reductions based on proximity to places of employment, pedestrian and cycle infrastructure, provision of public transport, etc.

The submission supported or opposed is:	The particular parts of the submissions supported or opposed are:	Support or Oppose	The reasons for support of opposition are:
RCL Henley Downs Ltd (#2465) C/- John Edmonds & Associates Ltd  <a href="mailto:hayley@jea.co.nz">hayley@jea.co.nz</a>	Chapter 29 Transport, Policy 29.2.2.5 (Submission point 2465.1)	Support	Jacks Point supports the proposed amendments to Policy 29.2.2.5 to remove the narrowing of the policy through enabling a reduction of parking “only” where the following policy matters are satisfied.
	Chapter 29 Transport, Policy 29.2.2.3 (Submission point 2465.9)	Support	Jacks Point support in part the intent of the proposed changes to enable lower rates of accessory parking, which does not necessarily need to be tied to specific zones, but rather related to circumstances where any zone can and should support reductions based on proximity to places of employment, pedestrian and cycle infrastructure, provision of public transport, etc.
	Chapter 29 Transport, Policy 29.2.3.6 (Submission point 2465.13)	Support	Jacks Point supports the deletion of this policy given that the outcomes relating to public amenities are vague.
	Chapter 29 Transport, Policy 29.2.4.4 (Submission point 2465.15)	Support	Jacks Point supports the deletion of this policy, consistent with its relief sought in its primary submission to delete the related Rule 29.4.10 High Traffic Generating Activities.
	Chapter 29 Transport, Rule 29.4.10 (Submission point 2465.19)	Support	Jacks Point supports the deleting of Rule 29.4.10 for he reasons set out in its primary submission
	Chapter 29 Transport, Rule 29.4.16 (Submission point 2465.2)	Support	Jacks Point supports deletion of this rule as all local roads are designated by the Council, who retain the powers under s176 to control any activity within unformed road.
	Chapter 29 Transport, Rule 29.4.17 (Submission point 2465.21)	Support	Jacks Point supports deletion of this rule
	Chapter 29 Transport, Rule 29.4.18 (Submission point 2465.22)	Support	Jacks Point supports deletion of this rule

The submission supported or opposed is:	The particular parts of the submissions supported or opposed are:	Support or Oppose	The reasons for support of opposition are:
C Dagg (#2586) C/- Town Planning Group Ltd PO Box 2559 QUEENSTOWN <a href="mailto:kate@townplanning.co.nz">kate@townplanning.co.nz</a>	Chapter 29 Transport, Rule 29.4.13 (Submission point 2586.1)	Oppose	Jacks Point agrees with the submitter that the rules in Table 29.2 are generally confusing because of the overlap with the Council's powers as a requiring authority that would override such rule in any event. However, in the event the rules within Table 29.2 are retained, Jacks Point opposes any increase to the status of activities not listed within this table. Council has powers through s176 of the Act to adequately control activities within road reserve undertaken by parties' other than the requiring authority.
	Chapter 29 Transport, Rule 29.4.15 (Submission point 2586.11)	Support	Jacks Points agrees that the term "Public Amenity" is ambiguous and support further clarification, should Table 29.2 be retained.
	Chapter 29 Transport, Rule 29.4.16 (Submission point 2586.12)	Oppose	Jacks Points opposes the proposed additions to this rule as they will exacerbate the problems with this rule and its relationship to the powers of the requiring authority under s176 which would override the rule in any event.