

TO: QUEENSTOWN LAKES DISTRICT COUNCIL

AND TO: Queenstown Lakes District Council  
Private Bag 50072  
QUEENSTOWN  
Attention: Email: services@qldc.govt.nz

NAME: Richard & Sarah Burdon

In addition to the Submission posted by Richard Burdon please can you include the following:

**Glen Dene Ltd & Glen Dene Holdings Stage 3 District Plan - Chapter 39**

Richard and Sarah Burdon are 3<sup>rd</sup> generation farmers of Glen Dene. If our children choose to continue on the legacy, they will be 4<sup>th</sup> Generation. Farming the High Country is tough financially and as farmers we have had to diversify into tourism operating a Hunting and fishing business and also owning the Lake Hawea Holiday Park - The Camp. We are caretakers of the land and are into sustainability, with our main goal in life is to look after Glen Dene and The Camp and provide opportunities for the next generation to be able to continue the legacy. By operating tourism businesses, we have opened our land up to others so that they can enjoy our property as much as us. Our vision for the future is to continue to develop the property accordingly so that we can share our piece of paradise.

From our point of view our property is already in Outstanding Natural landscape and we are in Rural General, so we are already abiding to many rules and regulations. Through the resource consent process Ngai Tahu are included in that process.

**WE Oppose the Wahi Tupuna in its entirety.  
We would like to be heard at the hearing.**

We believe that Wahi Tupuna should be an acknowledgement and recognition of the Ngai Tahu history in the area not impose rules and regulations. It must be firstly noted that "there were no permanent Ngāi Tahu settlements" and "they would just seasonally visit to gather food before returning home (<https://www.ngaitahutourism.co.nz/>). There is a huge lack of presence and due to this it is therefore very hard to mark specific sites of significance to Iwi unless you have proof of this and can support the significant sites with documentation. It is therefore not okay to put policies and objectives in place as marking one spot and not the other is actually prejudice. To also put rules in place is not necessary as the district plan currently already does this. We also do not believe that putting rules in place will actually achieve a desired outcome but will split communities.

We oppose the strategic direction of Chapter 5 especially the mapping as we believe that the Wahi Tupuna mapping is discriminatory because:

- The mapping is private land having an affect on people's property rights
- it has ignored areas that have been already developed when many of these areas historically have significance.
- the sites listed are not "specific" and many do not relate to historic documentation
- Ngai Tahui is one of the most significant residential property developers and tourism operators in the south island and the Wahi Tupuna objectives and policies and values are not consistent with their present operations.

- none of the settlements in the area were permanent and therefore it is very difficult to put lines on a map and identify significant areas unless there is evidence to back the areas up.
- Some of the areas which have been identified as significant sites in Wahi tupuna were previously owned by Ngai Tahu and have since been sold. This sends mixed messages as if the land was significant then it should not have been sold.

We believe that there is away forward that doesn't impinge of peoples property rights and this is through recognition and interpretation. This can be shown in the district plan as an area that needs to be recognized but our rules are already in place and should not be tampered with as this is not only confusing for the users of the district plan but it makes it very difficult confusing adding another layer which is not necessary.

Areas which are significant we believe have and were identified during the Tenure Review process such as The Neck at Lake Hawea and this has already been identified and land has been made available. It is not right to place a whole lot of rules and policies when there is no evidence on many of these sites and the historical information is vague. When we went through the Tenure Review process Ngai Tahu had an opportunity to identify sites of significance to Iwi, The Southern part of Glen Dene was not identified during this process. The comment in 39.1 the purpose "many urban areas with the district are valued by Manawhenua, however, the extent of development within these areas means many of the values have been reduced." Significant areas are significant areas and this should not change whether they have been developed or not. Therefore we do not believe that the maps truly reflect sites of significance but areas of which are now the easiest to put rules.

We have other objections with Chapter 39 where we oppose the documents wording and the lack of clarification. Please find listed a few examples where there needs more clarification.

For example:

39.2.1.1 There is not reasoning to why the activities are incompatible. The document needs to state the reasons for why they can not occur relative to their values.

396.2.1.2 The wording in this section is not okay. The use of the word "may be incompatiable" with values held by Manawhenua. It is either compatible or not compatible and this is not clarified. Eg. Commercial and Commercial recreational activities doesn't specify what is or isn't incompatible. Ngai Tahu have major tourism holdings so does this conflict with their values. Subdivision and Development is the same. This should be very clear especially with Ngai Tahu Property being "one of New Zealand's most significant residential property developers" this conflict with their values?

39.2.1.3 "Avoid significant adverse affects on values within tapuna areas - These affects need to be clarified.

Identifying specific Wahi tupuna areas with an overlay on the planning maps

Other reasons that we oppose the mapping :

- 1) Locations identified on the maps but did not identify specific Wahi Tupuna areas. There was no detailed information outlining the specifics or significance of the areas.
- 2) The fact that the areas (referring to Southern end of Lake Hawea) were blanketed and were not backed up with any other information shows that they

are not specific areas of Wahi. The neck has been identified as an area of significance and there is an area of land that has been set aside for Ngai Tahu which is managed by DoC.

- 3) The sites should be specific places not vague areas. By having blanketed areas discredits the values and reasoning on the rules.
- 4) There are other issues with using the blanketed approach, as well as statements such as "many urban areas within the district are valued by Manawhenua, the extent of development within these areas means many of these values have been reduced". What this implies is that values are lost when the areas have been developed with housing. The document doesn't state why or how the values have been reduced. So we have not understanding why urban land is not significant.
- 5) The blanket approach on areas such as Lake Hawea is not justifiable as the areas have been developed through farming, tourism and subdivision.
- 6) The native state of the land was presumably rainforest and this was apparently burnt by the tribes so this denotes that there are double standards coming through the document which are contradictory.
- 7) The area identified is typically the area where development around a township can occur having a horseshoe affect.
- 8) The area is a blanketed view of the area and is vague as there was no detailed evidence outlining the importance and significance of the area in detail.
- 9) Lake Hawea has been dammed and many of these values have already been lost with the raising of the lake
- 10) Areas that were provided out of the 1998 settlement were areas of land that were available to occupy (reserve land) rather than because they were significant areas showing that it was not specific areas of importance.

Setting out objectives and policies relating to subdivision, use and development within this overlay:

- We disagree with this as well as we do not believe that there should be another layer issued on the district plan. The district plan already deals with all the above and therefore the people of QLDC should not be issued with another layer of rules and regulations.
- It is up to the future generations to be able to make decision on how they believe their areas should be developed. Having the Wahi Tupuna sites could have a huge affect on this. An example is the lakefront land on Lake Hawea. As the community grows the farmers might eventually want to sell their land and this would allow for more lakefront development. The district plan process allows for this to happen and Ngai Tahu are able to submit along with the general public. This is fair. To put additional rules on this land through the Wahi Tupuna process is not fair.

Values which they are trying to protect are contradictory to past practices and practices that Ngai Tahu are doing today.

Eg.

- Removal of Indigenous vegetation from significant natural areas. Ngai Tahu were renowned for burning large areas of land including forest areas with no controls in order to create access throughout the country. Plus this already included in our district plan.
- Land that was given as settlement land to Ngai Tahu has been sold. An example of this is the land acquired by Ngai Tahu at the Neck of Lake Hawea. This land was taken out of the Pastoral Lease and then Ngai Tahu sold this to Hunter Valley. It is now in Private ownership and a Silver Pine lodge is operated on the land.
- Opportunities to identify areas of significance to Ngai Tahu were created through the Tenure Review process. Ngai Tahu insisted that the land go into DoC management rather than their own. Only the Neck region was identified and land was set aside through this process. We were hoping

that a board walk and some interpretative signage outlining the story and significance of the area would be put up but nothing has been done.

#### Main Points

- 1) Chapter 5 is prejudice and discriminatory and lacks clarification
- 2) In imposing the Wahi Tapuna notations over your land Council and iwi have
  - (a). failed to consult with the landowner
  - (b). Not provided the landowner ( or Council as far as you know ) with any specifics of the importance of the rea to iwi or the values that they are trying to protect
- 3) At the very least iwi should be required to provide to Council a cultural assessment of the areas now subject to the notations to support the imposition of the same and the proposed restrictions on land use and subdivision
- 4) We have evidence from the freeholding of the pastoral lease of Glen Dene undertaken that iwi had the chance to identify areas of cultural importance to them and they did not seek any form of identification such as the areas that they are now seeking notations over
- 5) That the District Plan already has rules and policies to follow and notations and resultant rules in Chapter 39 will impose arduous restrictions on the ability to farm the property , reasonable use of the land for the purposes it is zoned or designated and inevitably will result in additional expense in having to consult with iwi and prepare cultural assessments. It could impede on the future generation choices and the sustainability of the land.
- 6) There has been inadequate assessment of the need for the proposed notations and restrictions under section 32 of the Resource Management Act
- 7) Wahi Tapuna has the possibility to split communities because it only has an affect on part of the community, so it is not fair or equitable
- 8) Putting rules into place when Ngai Tahu is practices tourism and property development is contradictory

#### Conclusion

It is clear that the purpose of Chapter 39 should be recognition and acknowledgement of Iwi in the Queenstown Lakes District, There is no place for the rules and policies for Wahi tupuna in the District Plan due to the lack of evidence, the lack of clarity on the reasoning for the rules and the lack of purpose in achieving recognition of the significant sites. This is especially true because of the seasonal visitation to the area rather and lack of permanent settlement. The rules and policies should not be applicable as we have sufficient rules and regulations in our district plan and the mapping supplied is biased and discriminatory. Chapter 39 doesn't take into consideration future generations and the potential for further development in the lakefront area.

We believe that Iwi should be recognized in the Queenstown lakes and that this is really important, but we do not believe that this should infringe on our property rights. Currently there is not enough information provided or documentation which substantiates Wahi Tapuna mapping theory. There are other

ways to get acknowledgement recognition and it is about working together as a community for this to happen. Interpretation is one of the most important tools that can be used to achieve this. An example is Ecotourism where you can use story telling to promote the significance of Maori in our region by educating the people of Ngai Tahu and the significance of the Queenstown lakes to their iwi. This is where Ngai Tahu create significance provide the story and receive recognition of their presence in the area. Interpretative signage is one way where recognition of the significant sites can be achieved. Education is the key to recognition. Taking the school children to the Neck, Lake Hawea and telling them the stories is another way to recognize the Ngai Tahu passage throughout the area. The story can be included in the District plan documentation and be included in other documentation to be shared and to be proud of. Rules and policies in Chapter 39 will not achieve this.

