

**BEFORE THE QUEENSTOWN LAKES
DISTRICT COUNCIL**

IN THE MATTER of the Resource Management Act 1991 (the
“Act”)

AND

IN THE MATTER of the Queenstown Lakes Proposed District
Plan – Stage 3b Rural Visitor Zone

Statement of Evidence of

Sarah Seymour Burdon

For Glen Dene Limited & R&S Burdon #31043

29 May 2020

Introduction:

1. My name is Sarah Seymour Burdon. I and I have resided at Lake Hawea for 20 years. I am married to Richard Burdon who is a third-generation farmer on Glen Dene Station.
2. I have a Bachelor of Technology (Ecotourism) from Flinders University in South Australia. Prior to studying I worked in travel and hospitality as well as travelling overseas. I grew up on a farm in South Australia and I have always been passionate about sustainability.
3. Richard and I have been operating Glen Dene Hunting and Fishing for over 10 years - please see our website <https://glendenehunting.com/about/accommodation/>. As our children grew older we began to host our guests rather than bring in outfitters. For our calibre of guests we required a high-end accommodation. Initially we were able to use my parents-in law homestead accommodation to host the guests on Glen Dene Station. They had ensuited accommodations with amazing views of Lake Hawea. This made it easy to sell the whole package, at overseas hunting shows as we were able to offer accommodation and hunting packaged together.
4. Unfortunately, as our business grew, our numbers grew and we were not longer able to accommodate them with Richard's parents and so had to look for alternative accommodation. The logistics of having our guests accommodated all over the place became expensive and unmanageable. By doing up the Holiday House accommodation at The Camp we created Cross Hill Lodge. This is where able to host our clients for dinner, providing ensuited accommodation by utilizing the 4 x 2 bedroom cottages in The Camp. However, this also meant utilizing all our self-contained accommodation from February - June.
5. The accommodation was at a lower standard and it made it hard to compete with other luxury Hunting lodges when hunters compared accommodations. Many of our clients are from America and like to bring their children with them, and in-order to do this the accommodation must be of a high standard.
6. The Camp is your quintessential Kiwi Camping Experience offering a range of accommodation options from tenting, powered sites, tiny house, cabins, glamping, self-contained cottages and Holiday Houses. www.thecamp.co.nz The Camp is

beautifully basic and aims to cater to differing markets, budgets, groups and individuals by providing exceptional customer service, having great accommodation options, facilities and activities, being clean and tidy and having fantastic staff that put their heart and soul into the business, the customers and the environment, creating an amazing atmosphere with positive energy, taking people away from materialism and the hustle and bustle of life and bringing them back to basics, keeping things simple and getting them to experiencing a classic fun holiday with little or no drama just classic fun! The holiday houses are both off site located in the Lake Hawea Township.

7. We purchased the lease of what is now The Camp approximately 10 years ago. Part of the lease we were encouraged to put in more accommodation as we could afford. After operating the Camp for 5 year, in 2015 out of necessity to provide accommodation for our hunters we started planning to put 14 Geodesic Domes into the Campground and develop the top Holiday House into a lodge so that we could also cater and host the guests. We felt this was the most sustainable option as it added another income stream into The Camp of which we already had a market for 5 months guaranteeing cashflow for 5 months. It took us another 2 years to lodge the resource consent and another 3 years before we were able to start building.
8. However, due to cost and due to difficulty during the planning process and no longer being able to build the lodge we converted the Holiday House into a mini lodge and reduced the number of Geodesic Domes from 8 to 6. The process up until this date had cost us ~\$250k.
9. We are excited and pleased that construction has started and prior to Covid-19 we had planned to have 6 Geodesic Domes built by May 2020. The Geodesic Domes we have called Cross Hill and this is our high end high yield accommodation. www.crosshill.com Unfortunately with Covid-19 we have had to reassess the project and this is currently on hold.
10. The Camp office was originally located at the top of the park adjoining the Managers House. The office was very small and inappropriate for other staff to use invading the Managers privacy so we moved the office into the central part of The Camp where the recreation room was. This has been a great move, however, there has not been a space people to go when there is inclement weather. As part of the resource consent process we also allowed for a large Recreational Dome and this was getting built but

also on hold with Covid-19. The versatility of this Dome allows us to be able to pivot and look at other options for the Dome use including events.

11. Covid-19 has caused a major hit on our cashflow. At times like this we really rely on our self-contained accommodation to provide cashflow. Being able to establish new, bespoke accommodation such as the Domes is essential to attract people in a highly competitive market.
12. Our aim is to continue to add different types (clusters) of self-contained accommodation at different price points throughout The Camp and on the private land. The clusters ensure that accommodation is dotted/dispersed throughout The Camp preventing overcrowding and adding on to the current operation.

Summary:

13. This is a submission to request a change in zoning from the existing Rural General zone to a Rural Visitor Zone (RVZ) for the Lake Hawea Holiday Park we refer to as The Camp.
14. Without a change in zoning the long-term future of The Camp is at risk. With that goes the substantial contribution to the local community and the tourism industry in general.
15. We have invested a lot of money and time in trying to put new accommodation into The Camp. After 4 years we have finally put a peg in the ground for our Dome development (6 x ensuited - geodesic domes). The process involved approximately \$250k being spent before putting a peg in the ground and this doesn't take into account the stress and the time involved away from our core business. It has been an ongoing battle dealing with the consenting process, consultants (architects, engineers, planners etc), time delays which has made the development expensive, inefficient and an unenjoyable process all round.
16. Due to covid-19 we have had to halt current plans for the development as we will not be reaching the cashflows that were needed by the bank to fund the project. The RVZ we feel will alleviate some of the costs in the future so that we can focus on our guests rather than the bureaucratic processes of dealing with Rural General zoning. If we are able to achieve a more efficient zoning for the land this may allow us to progress development plans for the future, during this time when visitor demand is low and we

have more time to spend in the planning phase, so that we are ready and can provide a quality offering for when the tourists return. To do this, we require a zoning that enables us to progress development plans without unnecessary and fruitless spending. This process also allows us to plan in stages without time pressures.

17. Prior to Covid-19, there was significant demand for tourism in the region, and predicted to continue into the future. Tourism will be really important in the QLDC region even after covid. However, we have to ensure that we are sustainable now and in the future. Without making profit we will not be sustainable. Camping/cabins by itself is not going to cut it and relying on the Christmas market is a high risk as we have found out. Spreading the cash flow throughout the year is essential. To expand to a year-round offering for The Camp therefore have plans to construct more self-contained accommodation whether it be apartments, cottages or cabins.
18. We currently operate Glen Dene Station, Glen Dene Hunting and Fishing and The Camp. Our hunting and fishing clients have access with their guides on Glen Dene Station and other private and public land. This is a hosted service providing accommodation and meals and we guide our guests and tour them around the area. Previously we accommodated our guests at The Camp in the cottages and lodge. These are very basic and we are looking forward to upgrading them into the Domes when they are completed. Across the board of all our companies and operations our purpose it to create a group of sustainable businesses that create great memories and experiences for people to take home with them and enjoy for ever. We are all about sustainability, sharing and keeping traditions of farming/hunting/camping alive. We thrive on creating extraordinary experiences, excellence and going that extra mile with our guests.

Our Reasons for Requesting the Zone Change:

19. We need more higher-level accommodation choices in order to get greater yields, essential for long term profitability.
20. Increase accommodation options with self-contained/ensuites so they are available all year round. This is essential for increasing and stabilising cashflow and to weather economic downturns as we can offer a combination of high quality and low-cost accommodation. For example, the Cross Hill Domes are ensuited and warm and will be available all year round. However, camping is primarily seasonal and only really

suitable during good weather. During Covid-19 we were an essential business but during Level 4 and 3 our shared facilities were not able to be used so services that relied on these facilities could not operate which was approximately 90% of our current business.

21. Increase in cashflow which helps with securing finance to do the developments. Without a stable cashflow we are not able to make consistent loan repayments and apply for more funding.
22. Holiday Parks have high fixed and operational costs relative to revenue. It is therefore important that we can increase our service offerings which is important in remote areas with few services which the community can also enjoy in a lakeside setting such as: spa facilities, lodges, restaurants. We want to be able to spread these offering around The Camp and the adjacent Glen Dene owned private land.
23. It is important that the private land is also viable if the lease is not extended. The RVZ allows for visitor related activities and services and if all the facilities are only available on the leased land then if the lease is not renewed then the private land may not be viable or sustainable having a huge effect on the Burdons' investment.
24. Increase in profitability ensuring sustainability.
25. Increase employment options, stability being able to employ people all year round, in a variety of positions and consequently be able to provide increased customer service and provide a better quality service which encourages repeat customers.
26. No time pressure. The process in Rural General is time consuming and with the RVZ you are able to plan and make decision. Having surety allows you to act quickly when required rather than having to go through a process not knowing if you can do something or not or missing opportunities. Having certainty is also great for being able to plan stages of a development as you know what you can and can't do.
27. The RVZ removes some of the red tape as the zone provides a defined scope for visitor accommodation and improved certainty of outcomes.
28. Reduction in planner costs/lawyer costs and more money being spent on the actual development rather than on application and compliance costs. We lodged a resource

consent for a number of developments at once as the cost to do individual ones was not viable. This caused issues as some projects held up other projects due to landscape reports etc. By having the RVZ you can lodge consents as they are required rather than having to lodge them all at once. Not being able to plan and cost out projects until resource consent is granted. It is not a given that you can get approval, so it is hard to simulate the costs throughout the process. For example, when we applied for The Denver Glamping tents we were faced with Rural General rules and ONL landscape rules which made it difficult for the Council to approve. This not only held up the process but we had pay for a lawyer to argue for the glamping tents to be white and be placed in the Campground (without trees planted in front of them) along with all the other tents (arrangement of colours) and white campervans that were allowed to stay and frequent the lakefront.

29. This wasted considerable time, was costly and stressful and this can lead to missing seasons with delayed starts e.g. Glamping tents need to up by October as only short season. Also, we were constrained with having to remove the tents out of season which also warrants a huge cost. Under RVZ we would be able to keep the visitor accommodation up all year.
30. Reduction in time delays and disruption in operations of the business with time away from the business dealing with planning issues.
31. Confidence to be able to make decisions in the future.
32. We can continue to offer a high-quality product so that the people can enjoy what this region has to offer.
33. Overall, we are seeking a zone which will allow options for the development of self-contained visitor accommodation units, camping opportunities (including permanent or semi-permanent “glamping” tents), and associated facilities. Such accommodation is necessary to provide year-round cashflow and ensure the long-term success of The Camp.
34. We would like to invest in the long-term viability and sustainability of the Camp. However, the bank will not finance development on leasehold land within the campground, nor on Rural General zoned land within an Outstanding Natural Landscape (ONL). Therefore, future accommodation buildings may need to be located

on our privately owned land, and a new zoning which provides for this is necessary in order to obtain finance as well as to allow these buildings to integrate with The Camp.

35. The inclusion of our private land (Lot 1 and 2) within the zone is proposed because we want to develop the Camp as an integrated area, with campers having the ability to utilise the whole area as one. The expanded land area of The Camp will allow a larger area for recreational walking, biking and running; and allows for built form to be spread out across a wider geographic area to minimise landscape effects.

Impact on the Area:

36. It is obvious that the main concerns are whether the area can absorb development and the effects on the ONL, whether Rural General zone is more suitable than Rural Visitor Zone and whether the area is remote enough to be considered for the zone. Can the landscape accommodate change?
37. Land use effects will be cumulatively minor and not visually dominant and are integrated into the landscape. It is important to note that the campground has existed in this location for almost 50 years and is an established part of the landscape.
38. Although The Camp and surrounding land can be seen from the road and the lake it is not significant when you see the vastness of the lake. We are talking about a piece of land that takes up about 22 hectares on the eastern side and with buildings covering a maximum of 7% of this area. Camping and buildings in this area is not a new activity as the current accommodations have been there since 1971. During the year it is common to see a variety of vans and coloured tents as you would expect to see for a Holiday Park as you would expect to see a variety of accommodation and buildings. Another example is Glendhu bay "kiwi" campground. We therefore consider that development in this area is actually of low sensitivity when you look at the activity – visitor accommodation already being present.
39. While the evidence of Mr White discusses that the zone does not need to be remote, we also note that the site is in fact remote from the main centres. Hawea does not have the same level of facilities, services and amenities as the main centres of Wanaka or Queenstown, and also does not have the same level of provision for visitor accommodation options. There is limited other zoned land within Hawea providing for visitor accommodation; and also the intended offering within The Camp is different to

the large scale commercial hotels and motels expected in these main centres. Therefore, an alternative zone type through the Rural Visitor Zone is entirely appropriate and necessary.

Open Space:

40. The District Plan zoning should support and enable the continuation of what is already there and has existed for almost 50 years. The Rural Visitor Zone does this as it specifically provides for campgrounds and other visitor accommodation and under this zone there are no distinctions whether it is on private or public land. The Open Space Zone is only relative to public reserve land and the Council has demonstrated through its Stage 2 decisions there is no way this zone can be extended onto the private land in the future.
41. We more or less just want to extend The Camp into the private land and to do this the Rural Visitor Zone fits the bill. We are wanting to add more accommodation into The Camp and on the private land.

Investment for Future Tourism:

42. The extension of the RVZ across the site and including our private land will ensure we have sustainability for the future. Not putting more accommodation in is going to be detrimental. We have had the camp for 10 years. We bought it when I was 40 and I am now nearly 50. We have a vision and with that we have passion.
43. We know what it takes to run a holiday park and there is a lot of sweat and tears involved in the process. Richard and I have reinvested significantly back into The Camp as we have a vision and are passionate about what we do and what we are creating for the people of this area and the visitors to the region. It is our intention to continue to improve The Camp and add accommodation throughout The Camp extending on to the private land.
44. However, to date under the existing zoning huge costs are required before we even get to the building stage. Wasting time and money seeking consents often for non-complying activities in a Rural General zone that we could have invested on the actual bones of The Camp. It has already taken us 4 years before we started building the

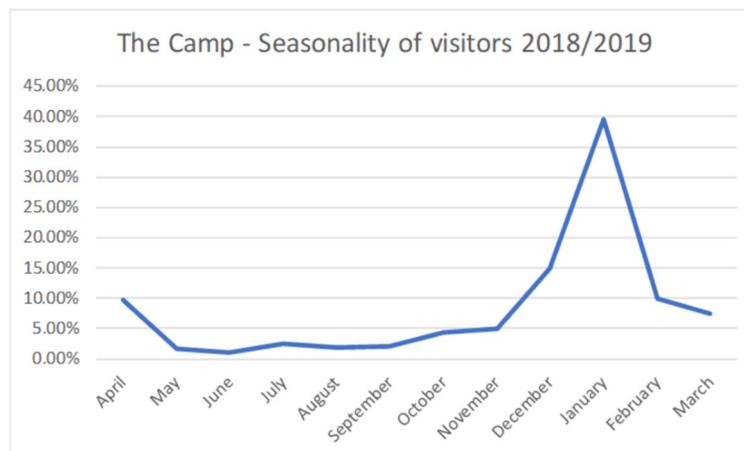
accommodation Domes in the Camp. These are nestled in on the Hill without a lake view and are our high-end accommodation with ensuites.

45. We want to develop the Camp as an integrated area, with campers having the ability to utilise the whole area as one. The expanded land area of The Camp, including our private land, will allow larger recreational amenities and allows for built form to be spread out across a wider geographic area to minimise landscape effects. We also require a zoning which will enable us to secure investment funding from the bank, which the current arrangement with leasehold land and Rural General Zoning does not provide.
46. There is a demand for rural tourism outside of the town centres and this should be encouraged especially in regard to the problems we have faced as a community with freedom camping. A larger camp adjacent to a lake gives tourists the feeling they are freedom camping but in a controlled and environmental managed environment.
47. Our domestic market is predominantly families and is limited to the school holidays summer periods. We need to be able to provide more accommodation suitable for the retiring couples and short-term visitors who prefer self-contained options.
48. The rural communities need to be able to develop their product range so that they too are sustainable. Our company is proof of this as we have struggled with farming profitability. We have had to diversify our business. We have been lucky enough to be able to offer hunting and fishing. However, we have struggled to be able to host our visitors on site.
 - There was no suitable accommodation nearby as we were isolated from the main town centres.
 - Our hunters wanted to stay close to where they were conducting their activity and considered this part of the experience. The Camp fits this bill as the hunters are able to come back for breaks during the day.
 - It was too costly to go through planning to build accommodation on private Rural General land.
49. Being able to operate and utilise the private land ensures that we can continue to develop clusters of accommodation which works really well in a Holiday Park.

50. Extending onto the private land also ensures that our guests can have privacy and continue to experience a park like setting and enjoy nature and the birdlife and the tranquillity. People are able to gather or they can go and experience things such as spa treatments away from the other guests. It is all about creating a destination with a range of options, attractions, activities without losing the appeal. We have limited beach areas and the private land provides access to some gorgeous swimming areas and with these we can add eating facilities, adventure centres etc. If we had to apply in rural general it would be very difficult as it doesn't fit the Rural General purpose.
51. People can wander around the whole area and enjoy walking, running, bird watching etc. The extension on to the private land allows different types and groups of people to spread out in the area and we can retain the values and integrate accommodation into the landscape.
52. It is therefore imperative that the Council continues to help its constituents look outside of the square and grab the opportunities as they come. The Rural Visitor Zone submissions proved a number of things:
- People are prepared to spend money on developing visitor accommodation in the region and now is a great time to plan for this
 - There is a demand for tourism outside of the main centres and in the rural areas People wanting to get away from the crowds and experience New Zealand hospitality and in a direct lakeside setting which is not common
 - The RVZ encourages accommodation with a point of difference outside of the main centres
 - We need a variety of accommodation besides hotels in Queenstown
 - Why does someone want to stay on the lakefront and not have a view? We want to be able to plan so that our guests can enjoy and appreciate the districts landscapes
 - Increase our product range which caters for a greater range of people
 - People are not restricted by the time of year they are travelling.
53. There has been a lot of publicity about policy, both regional and nationally to assist New Zealand businesses to recover and grow in the post covid-19 environment. This submission directly addresses that need. We need certainty and a clear framework to work with, and one which provides for an efficient process and avoids fruitless administrative spending.

Other Matters for Consideration

54. To get a real understanding and what we talk about I invite you to come and stay in the Camp and see what it's all about before you make your decision this time. You will be able to enjoy the beauty, the birdsong and the gorgeous trees. You will notice that there is limited accommodation for the winter and you will only choose the cabins or camping options if you are brave enough to use the shared facilities.
55. If you stay on the weekend you will appreciate the food truck and being able to grab a coffee in the morning and some dinner after your day out. If you stay in a cottage you will have your own bathroom so you won't have to step out in the night to go to the loo.
56. However, you will not be able to see the amazing landscapes and views from the cottages, the one thing you were imagining.
57. You will realise that there is plenty of room to add accommodation, the Camp is huge and you will also see that there are clusters of different accommodation and that more clusters will not have the detrimental effects on the environment as the planners have described in their reports.
58. You will see how big the grounds are realising the high costs involved to keep that going. You will also see how empty it is in the winter and you will know from the graph below that the camp is empty most of the year. The rules that we are proposing will also manage the scale of activity.



59. You will be greeted by our staff who will be wondering if they have a job in the next month. You can go for a wander around the park and breathe in the fresh air. At the lakefront you take in the views of the town to the right and the amazing views up the lake looking towards the head of the lake towards Mt Patriarch.
60. If you are not familiar with Glamping you will love the Glamping tents tucked away and their gorgeous views will make you want to book for the summer and bring your friends.
61. You will notice the geodesic dome development and wonder why they are on the hill and not on the lakefront.
62. You might hire a bike and go for a ride along the lakefront and stop at the dam and look at the photos that show what it was like before the Dam development and the raising of the lake.
63. It has cost us over \$100k to go through PDP planning processes to date. Our previous submission was rejected. Our planner enquired why we wanted to continue and we advised that it was important because even though we have spent this money now we do not want to go through this process again and again in terms of applying for resource consents with no guarantee of success.
64. The rules associated with the Rural General zoning (and the ONL) are too stringent in and detrimental due to cost, stress and time delays. Similarly, a possible split zoning with part Open Space Zone and part of our land another zone does not support our development plans. This is an investment we have been prepared to make so that we do not have to go through the stressful process every time we want to put a building in.
65. We have a really amazing vision for The Camp and surrounding land but we do not want it to be at the detriment to our health as it is not worth it in the end if we can't handle the process. We want our energy to be put into the people that are visiting the area, not the bureaucracy.

Conclusion:

66. The purpose of RVZ is to allow for visitor accommodation in a rural outstanding natural landscape. We are asking council to allow us to continue to put visitor accommodation

in on The Camp lease and extend this onto the private land. For the zoning to cover the whole area to ensure consistency and continuity.