Attachment "A" A copy of the Appellant's submissions

RESOURCE MANAGEMENT ACT 1991 SUBMISSION ON PUBLICLY NOTIFIED PROPOSED DISTRICT PLAN

TO: QUEENSTOWN LAKES DISTRICT COUNCIL

NAME: REMARKABLES PARK LIMITED

C/- Jenny Carter
Remarkables Park Limited
PO Box 1075
QUEENSTOWN

REMARKABLES PARK LIMITED (RPL) makes this submission on the Queenstown Lakes District Council's Proposed District Plan (PDP).

- 1. RPL makes this submission on specific chapters of the PDP. RPL's submission is that:
- 1.1 The PDP is contrary to Part 2 of the Resource Management Act 1991 (the Act) because:
 - (i) it does not promote sustainable or integrated management;
 - (ii) it does not manage the use, development and protection of natural and physical resources;
 - (iii) it does not avoid, remedy or mitigate adverse effects;
 - (iv) it does not meet the requirements under section 32 of the Act;
 - (v) is not the "most appropriate" way to achieve the purpose of the Act; and
 - (vi) it does not represent sound resource management practice.

Introductory Statement

- 1.2 RPL is a development company that owns 150ha of land zoned Remarkables Park Zone (RPZ), which provides for a town centre and mixed-use urban development in Queenstown.
- 1.3 The PDP identifies that the RPZ is exempt from the PDP (27.3.3.1). In general this is supported. However, there are changes proposed by the PDP that directly and indirectly affect the RPZ. The chapters that have direct implications for the RPZ are:
 - (a) Strategic Direction;
 - (b) Urban Development;
 - (c) Tangata Whenua;
 - (d) Landscapes;
 - (e) Town Centre Zones (Queenstown, Arrowtown and Wanaka); and
 - (f) Planning Maps;

The RPZ is a town centre zone (with an established town centre) and, therefore, this should be acknowledged and confirmed in the PDP. In the absence of such an acknowledgement and confirmation, the PDP will fail to properly address and manage the resources of the District, in particular the continued development of a strategically critical centre at Remarkables Park.

- 1.4 Other chapters, such as the High Density Residential Zone, may have indirect implications for the RPZ because they contain statements about types of development that can occur within the RPZ.
- 1.5 RPL considers that substantial parts of the PDP are driven by the following issues:
 - (a) Urban containment:
 - (b) The cost of infrastructure (particularly to Council) and the efficient use of infrastructure;
 - (c) Increasing residential density in existing developed and zoned areas; and
 - (d) Protection of existing town centres and distinguishing between tourist needs and local needs.
- 1.6 RPL considers that these issues are either overstated, are not relevant or are incorrectly addressed in the PDP. It considers that:
 - (a) The infrastructure cost burden to the Council is a matter that can and should be addressed under the Local Government Act 2002. The Council has levied development contributions for many years. Those contributions should have been applied to the maintenance and upgrade of existing infrastructure and the provision of new infrastructure:
 - (b) Increasing residential density near existing town centres will place a significant burden on existing infrastructure that is already under pressure. Retrofitting existing infrastructure is an inefficient and expensive option when compared to establishing new infrastructure in greenfields zones (such as the RPZ). The RPZ has the added benefit of being located near the Shotover Treatment Plant. RPL also considers that infill housing can adversely effect the character and amenity of established residential areas;
 - (c) The RPZ will serve the needs of locals and tourists, and it is artificial to suggest otherwise. Tourist activities are enabled within the RPZ. The RPZ occupies a strategic location that provides access to the mountains, rivers and the lakes, together with tourist and recreation activities located outside the Queenstown Town Centre;
 - (e) Urban sprawl is not a pressing issue for the District. If the concern relates to maintenance of rural character and amenity, RPL considers that the PDP adequately addresses those issues through the Rural Chapter and the landscape overlays. RPL does not necessarily oppose an urban growth boundary, but considers that the PDP must provide for exceptions to it if a boundary is to be applied; and
 - (f) RPL considers that it is important that the interests of Tangata Whenua are taken into account (consistent with section 8 of the RMA). However, it considers that the Tangata Whenua chapter places an unreasonable burden on both landowners and iwi in respect of applications for resource consent. RPL considers that the PDP

transfers the Council's obligations when preparing its district plan to iwi and consent applicants at the resource consent stage. This will significantly delay the resource consent process.

1.7 A significant issue with the PDP is integration with the Queenstown-Lakes Operative District Plan (Operative District Plan). Some chapters of the Operative District Plan will not be reviewed (such as the RPZ) and others will be reviewed at a later date. For example, the status of the "Sustainable Management", "District Wide" and "Transport" sections must be relevant to the PDP as are the special zones that are not being reviewed. Further, it is not entirely clear which chapters of the Operative District Plan are being replaced (in full or in part).

General Relief Sought

- 1.8 Given the above concerns and comments, RPL seeks that the PDP be amended to:
 - (a) Recognise that the RPZ is a town centre;
 - (b) Ensure that existing development rights within the RPZ are not compromised by the PDP;
 - (c) Acknowledge that the RPZ will serve both tourists and locals:
 - (d) Delete references to the cost of infrastructure to Council;
 - (e) Reduce prescription and enable effects based assessments of activities. In particular, the "direct and control" approach to tourism, commercial, residential and industrial activities is not appropriate and is not supported;
 - (f) Provide a specific method to enable consideration of urban development outside the urban growth boundary; and
 - (g) Delete the Tangata Whenua chapter OR undertake the necessary analysis to identify specific areas or features of significance to iwi.

OR

- (h) The PDP be rejected until the overarching issues in relation to integration with the Operative District Plan and existing zones are properly addressed.
- 1.9 The grounds set out above also support the specific relief sought below.

Without derogating from the generality of the above, RPL makes the following specific submissions:

2. Application of the Proposed District Plan

- 2.1 Section 27.3.3 states that the RPZ is not part of the PDP **and** subdivision chapter, and that the PDP **and** the subdivision chapter shall not apply to the RPZ. This statement is generally supported as the RPZ been established through extensive plan review and plan change processes.
- 2.2 The inclusion of a separate statement at page 27-10 that other zones (such as the Jacks Point zone) are excluded from the Subdivision chapter but not the PDP, provides further confirmation that the RPZ is excluded from all of the PDP. RPL seeks further clarification and certainty in this regard. For instance, a specific exclusion in the Strategic Direction, Urban

Development, Tangata Whenua, Landscapes, and Historic Heritage sections would ensure there is no confusion.

Relief sought:

- 1. RPL supports the exclusion of the RPZ from the PDP.
- 2. RPL requests that the PDP is amended to clarify this exclusion.
- 2.3 The RPZ is a town centre zone (as noted above). As such, the PDP needs to include a statement in the Strategic Direction or Urban Development section confirming that the RPZ is a town centre. This will ensure that the RPZ is appropriately integrated into the PDP framework.

Relief sought:

1. RPL requests that the PDP is amended to record that the RPZ is a town centre.

3. Planning Maps

RPZ

- 3.1 The PDP planning maps, specifically maps 31a and 33, make changes to the RPZ. Further, there are errors in the planning maps because they have not been updated accurately. The following errors have been identified in planning maps 31a and 33:
 - (a) The designation approved for the purposes of the new Wakatipu High School has not been notated on the planning maps;
 - (b) The planning maps have not been updated to remove unformed legal roads that have been legally stopped. Specifically, the alignment of the Eastern Arterial Road (EAR) was altered via the formal road stopping process, and the new alignment has been confirmed Therefore the retention of the unformed legal road is an error;
 - (c) Removal of the RPZ zoning from the true left bank of the Kawarau River. This land is zoned Activity Area 2 of the RPZ and the change has no proper basis and is not explained in any supporting material. It is assumed that it is an error; and
 - (d) Inclusion of a landscape classification boundary between the Remarkables Park land parcel boundary and the Kawarau River. This landscape classification is in error because:
 - The subject land is currently zoned Activity Area 2 of the RPZ and therefore is within an urban zone. An ONL should not apply to an urban zone (proposed rule 6.4.1.2).
 - The RPZ is excluded from PDP (see paragraph 27.3.3 of the PDP) and therefore this change to the RPZ is in error.
 - The landscape line denoted in Appendix 8 of the Operative District Plan correctly shows that all of the RPZ is outside the ONL. There is no basis upon which to alter this line, which had been fixed by the Environment Court.
 - The land is within the urban growth boundary.
- 3.2 There is a set of "protected trees" shown on Boyd Road. It is unclear as to why these trees have been identified; they do not appear to have any historic value and while they are denoted on the planning map, they are not included in the schedule of protected trees.

Airport

- 3.3 The airport designation has not been removed from Lot 1 DP472825 (Lot 1). This lot is a fee simple title in the ownership of Aviemore Corporation Limited. The site was subject to a land swap, which was formalised by boundary adjustment RM130649. At the time the boundary adjustment was approved and a title issued to Aviemore Corporation Limited, the designation should have been lifted. The fact that it hasn't is simply an oversight that should be corrected; the airport designation should only apply to land owned by QAC.
- 3.4 At paragraph 2.1 of the "Notice of Requirement for the designation to be included within the District Plan subject to modification" (30 March 2015), the airport identified the land to which the designation relates. This list does not include Lot 1 and is therefore correct. However, the plan provided at Annexure B incorrectly includes Lot 1 within the designation. It is noted that the plan at Annexure B is outdated and not been updated to reflect road alignments and land swaps that were confirmed a number of years ago. It also incorrectly shows the location of the site owned by Aviemore Corporation Limited. These errors should be corrected.
- 3.5 Plan Change 35 (PC35) was promulgated by the Queenstown Airport Corporation to introduce new noise contours for the Airport. It was the subject of Environment Court proceedings. The Court directed that the PC35 contours to be applied to the RPZ will not be confirmed until the QAC's notice of requirement pertaining to land within the RPZ is finally determined (it is noted that the notice of requirement has been partially rejected). The location of the noise contours over the RPZ cannot be confirmed until the QAC's notice of requirement is finally determined.
- 3.6 Planning map 31a shows all of the Frankton Flats (both A and B) as one colour, with the words "Frankton Flats" written across Frankton Flats A. Frankton Flats B is left blank. Planning map 33 has the words "Frankton Flats" written across Frankton Flats B. The planning maps need to clearly show that there are two Special Zones; A and B. Failing to notate the planning map correctly will create confusion; a landowner within Frankton Flats B will not know that their site is within 'B' and that separate provisions apply between the two Special Zones.

Relief sought:

- 1. That planning maps 31a and 33 are amended so that there are no changes to the RPZ.
- 2. Include the High School designation on maps 31a and 33.
- 3. Update planning maps 31a and 33 to remove unformed legal roads that have been stopped. Specifically, the EAR alignment north of the formed EAR, the unformed section of Cherry Blossom Avenue, the superceded alignment of the EAR and associated roads within Frankton Flats B Zone.
- 4. Remove the errors on planning maps 31a and 33 as they relate to the RPZ Activity Area 2, which includes amending the planning maps to locate the landscape classification line correctly at the edge of the Kawarau River, and include the RPZ to the Kawarau River boundary.
- 5. Update the planning maps to correctly identify the extent of the Airport Designation 2 and remove the airport designation from lot 1 DP472825.
- 6. Await the outcome of Plan Change 35 and the QAC's notice of requirement pertaining to land within the RPZ before fixing the location of noise contours within the RPZ.
- 7. Clearly show on the planning maps that the Frankton Flats is not one special zone, and is instead two separate zones each with a separate set of provisions.

8. Remove the trees denoted as protected on planning map 31a, located on Boyd Road. These trees should not be listed as protected.

Other comments on planning maps 31a and 33

- 3.7 A review of the ONL line indicates that it is located within urban areas and does not match the proposed urban growth boundary (for example, at Quail Rise). It also appears to have been extended in many areas (for example, along Kelvin Heights).
- 3.8 RPL considers that there are areas of ONL that have been changed due to urban development occurring nearby. In these situations it is appropriate for consideration to be given to contracting the ONL lines.

Relief sought:

- 1. Amend the landscape lines so that it is clear that urban areas are not within an ONL.
- 2. Contract rather than expand ONL lines to acknowledge urban development and a changing environment.
- 4. Chapter 3: Strategic Direction

Strategic Direction Chapter does not apply to the RPZ

4.1 It is understood that the PDP, including the Strategic Direction Chapter, is not to apply to the RPZ. That is supported to the extent that in ensures existing development opportunities are not compromised. However, the PDP must also acknowledge that the RPZ is an existing town centre.

Relief sought:

1. Amend the Strategic Direction Chapter to clarify that it does not apply to the RPZ and acknowledge that the RPZ is an existing town centre.

General Comments

4.2 The objectives and policies should be amended so that they are effects based and not prescriptive, and to recognise the importance of all commercial centres. The attempt to prescribe or "pigeon-hole" existing commercial, town centre and mixed use zones is fraught and lacks a "real world" foundation. Commercial centres need to be flexible and adaptable.

Relief sought:

 Revise the objectives and policies so that they are effects based and provide a strategic management approach.

Goals, Objectives and Policies

Goal 1.2.1

4.3 Goal 1.2.1 reads:

"Develop a prosperous, resilient and equitable economy"

4.4 The Goal might be laudable but seems to be well outside (or at least a significant extension) of the environmental remit of the RMA. It also raises the question of "equitable to whom, or to

what?". Is it meant to be equitable between people, or between the environment? Or between communities?

4.5 RPL considers that Goal 1.2.1 is an example of an overly complex and esoteric chapter of the PDP. Furthermore, what is the status of the "Goal" statements? Is an applicant for resource consent required to consider, interpret and apply them?

Relief sought:

- 1. Delete the goal statements to remove confusion as to their status and relationship to objectives and policies.
- 4.6 As a general statement, it is considered that there are too many objectives and too much repetition. RPL also considers that the word "avoid" should not be used in the strategic directions chapter and the chapter is intended to provide broad policy guidance rather than ultimatums.

Objective 3.2.1.1 and Associated Policies

4.7 Objective 3.2.1.1 reads:

Recognise, develop and sustain the Queenstown and Wanaka central business areas as the hubs of New Zealand's premier alpine resorts and the District's economy.

This objective is unclear as to what is meant by central business areas. It would be improved by removing the word 'central' because this implies being central geographically. The objective needs to recognise that it is not only the central business areas that are important to the district's economy, and which contribute to the District as being a premier alpine resort. In particular, the RPZ makes a significant contribution to the district's economy and this should be "recognised and sustained".

4.8 Associated policy 3.2.1.1.1 states:

Provide a planning framework for the Queenstown and Wanaka central business areas that enables quality development and enhancement of the centres as the key commercial hubs of the District, building on their existing functions and strengths.

The RPZ is a key commercial hub that should be recognised under this policy.

4.9 Policy 3.2.1.1.2 states:

Avoid commercial rezoning that could fundamentally undermine the role of the Queenstown and Wanaka central business areas as the primary focus for the District's economic activity.

The policy uses the term 'avoid', and this should be deleted. It refers to Queenstown and Wanaka Central Business Areas as the primary focus for the District's economy and this is incorrect. The RPZ will be the focus of significant tourism activity both currently and as the District grows. Whilst the RPZ is not a "rezoning", its roles as a centre where considerable economic activity will occur must be recognised.

4.10 Policy 3.2.1.1.3

Promote growth in the visitor industry and encourage investment in lifting the scope and quality of attractions, facilities and services within the Queenstown and Wanaka central business areas.

This policy incorrectly focuses on the Queenstown and Wanaka central business areas for visitor industry and encouraging investment. Again, the significant strategic role of the RPZ must be recognised.

4.11 RPL also considers that tourism is an essential part of the Queenstown economy and considers that it should be expressly recognised in the Strategic Direction Chapter.

Relief sought:

- Amend objective and policies identified above so that the recognise the contribution of all commercial areas, in particular the RPZ.
- 2. Expressly recognise the contribution that tourism makes to the Queenstown economy.
- Delete the word "avoid".

Objective 3.2.1.2 and Associated Policies

4.12 Objective 3.2.1.2 states:

Recognise, develop and sustain the key local service and employment functions served by commercial centres and industrial areas outside of the Queenstown and Wanaka central business areas in the District.

Consistent with the submissions above regarding objective 3.2.1.1, the RPZ must be identified as a primary central business area. RPL considers that this merely reflects the scale of development undertaken and enabled within the RPZ.

4.13 RPL also considers that as the District grows, the visitor industry will not solely focused in the central business areas, but will be provided for within other mixed use and commercially zoned areas.

Relief sought:

- 1. Amend the objectives and policies to recognise the RPZ as a primary central business area.
- 2. Amend the objectives and policies to recognise that it is not only the central business areas that provide for tourism and the visitor industry.
- 3. Delete the word "avoid".

Objective 3.2.1.3 and Associated Policies

4.14 Objective 3.2.1.3 is supported because it recognises the importance of supporting innovative and sustainable enterprises. The associated policies are also generally supported with the exception of 3.2.1.3.1 because it unnecessarily limits the encouragement of diversification to commercial zones

Relief sought:

1. Retain Objective 3.2.1.3 and associated policies.

2. Amend policy 3.2.1.3.1 so that it recognises that the policy provisions should enable diversification and a wide variety of activities, not just limited by the zone in which they are located, but managed by the effects that they may have.

Objective 3.2.1.4 and Associated Policies

4.15 Objective 3.2.1.2 states

Recognise the potential for rural areas to diversify their land use beyond the strong productive value of farming, provided a sensitive approach is taken to rural amenity, landscape character, healthy ecosystems, and Ngai Tahu values, rights and interests.

The objective is supported in that it recognises that it is important to enable diversification. However, the use of the term "sensitive approach" is not supported because a sensitive approach will not be required in all rural locations.

Relief sought

- Amend the objectives and policies to incorporate the set of objectives and policies that promote diversification District wide OR amend Objective 3.2.1.4 to read
 - 3.2.1.4 Recognise the potential for rural areas to diversify their land use beyond the strong productive value of farming, provided a sensitive approach is taken to rural amenity, landscape character, healthy ecosystems, and Ngai Tahu values, rights and interests. for diversification from traditional land uses, and the benefit of increasing economic value through diversification, while avoiding, remedying or mitigating any potential adverse effects on the environment.

Objective 3.2.1.5

- 4.16 The reference to the term "Designated airports" implies that this applies only to the Wanaka and Queenstown airports. This should be clarified.
- 4.17 The Council should ensure that adequate infrastructure is provided that supports the community, while ensuring that adverse effects are minimised. It is unclear as to why the policy does not promote the maintenance of all infrastructure services; the Council is not tasked only with provision of airports, roads and communication technology, but also other infrastructure including water supply, wastewater and stormwater. RPL considers that the "three waters" are essential infrastructure and should be recognised.

Relief sought

- 1. Amend objective 3.2.1.5 to read:
 - 3.2.1.5 Maintain and promote the efficient operation of the District's Provide and maintain infrastructure that supports the existing and future community, ensuring that infrastructure provision is efficient and is provided in time to adequately service current and future development development including designated Airports, key reading and communication technology networks.

Goal 3.2.2

4.18 As noted above, RPL does not consider urban sprawl is not a pressing issue for the District and does not support infill housing or increased density in existing built environments due to adverse effects on character and the inefficiency of upgrading/retrofitting existing infrastructure.

Relief sought:

1. Acknowledge that some urban development outside the urban growth boundary may occur

Objective 3.2.2.1

4.19 Objective 3.2.2.1 states

Ensure urban development occurs in a logical manner:

- to promote a compact, well designed and integrated urban form;
- to manage the cost of Council infrastructure; and
- to protect the District's rural landscapes from sporadic and sprawling development.
- 4.20 RPL considers that the phrase "to manage the cost of Council infrastructure" should be deleted as that is a matter for the Council under the Local Government Act 2002.
- 4.21 RPL also considers that the use of the term "protect" is too strong and the policy should reflect that development should be assessed on its merits. Further a compact urban form may be desirable in some locations, but not in others. There are urban areas that will have a less compact form (those located further from large commercial areas) and that form of development should not be discouraged.

Relief sought

1. Amend Objective 3.2.2.1 to read

Ensure Enable urban development occurs in a logical manner: that it

- to promote a achieves a compact, well designed and integrated urban form;
- to manage the cost of provides efficient Council infrastructure; and
- to protect the District's rural landscapes from is appropriately located sporadic and sprawling development.

Policy 3.2.2.1.1

4.22 Policy 3.2.2.1.1 states:

Apply Urban Growth Boundaries (UGBs) around the urban areas in the Wakatipu Basin (including Jack's Point), Arrowtown and Wanaka.

RPL considers the words "in the Wakatipu Basin (including Jack's Point), Arrowtown" to be superfluous.

Relief sought:

Delete the words "in the Wakatipu Basin (including Jack's Point), Arrowtown".

Policy 3.2.2.1.2

4.23 RPL opposes the "avoidance" of urban development outside the urban growth boundary and considers that there should be limited and carefully managed opportunities for urban development outside the urban growth boundary.

Relief sought:

1. Either delete the policy or amend it to provide for limited and carefully managed opportunities for urban development outside the urban growth boundary.

Policy 3.2.2.1.3

4.24 This policy is unnecessary as it adds little value beyond the specific provisions for each urban zone.

Relief sought:

1. Delete policy 3.2.2.1.3

Policy 3.2.2.1.4

4.25 RPL support the provision of higher density residential development provided it is not infill development and does not result on further pressure that cannot be accommodated within existing infrastructure.

Relief sought:

1. Amend the policy to read:

Encourage a higher density of residential development in locations close to commercial and mixed use zones and within greenfield areas where new infrastructure has the capacity to service such development. town centres, local shopping zones, activity centres, public transport routes and non vehicular trails

Policy 3.2.2.1.5

4.26 If an urban growth boundary is to be applied it can only be altered by way of a plan change. Therefore, this policy essentially states the requirements of the Council's section 32 analysis to evaluate the location of the urban growth boundary. The policy serves no purpose once the provisions are operative.

Relief sought:

Delete Policy 3.2.2.1.5.

Policy 3.2.2.1.6

4.27 RPL opposes policies that seek to expressly control or influence market competition. A district plan, by its very nature, has market implications. However, those implications should be driven by environmental outcomes not a desire to achieve "effective market competition" (whatever that is supposed to mean).

Relief sought

1. Delete policy 3.2.2.1.

Goal 3.2.3 and Associated Objectives and Policies

4.28 While the intent of these provisions is generally supported, their effectiveness is questioned as they are so broad as to be ineffective. It is considered that they add very little to the policy or strategic framework of the PDP. Further, heritage is expressly addressed under section 26 of the PDP.

Relief sought

1. Delete Goal 3.2.3 and associated objectives and policies

Goal 3.2.4 and Associated Objectives and Policies 3.2.4.1 to 3.2.4.5.

- 4.29 These provisions are not necessary given the inclusion of Section 33, which provides specifically for indigenous vegetation and biodiversity and which applies District Wide.
- 4.30 A number of the policies read as methods; if they are retained, those that read as methods should be included as such rather than policies. Objective 3.2.4.4 and policy 3.2.4.4.1 should be amended given that objective 3.2.4.4 uses the term "avoid" without any qualification.
- 4.31 It is important that the PDP is streamlined and removal of these provisions would reduce complexity.

Relief sought

 Delete the above objectives and policies and rely on section 33, which provides specifically for this topic at a district wide level. Should the provisions be retained, ensure that policies do not read as directive methods, and the terms "avoid" or "protect" need to be deleted or qualified.

Objective 3.2.4.6.

4.32 RPL supports the recognition of the importance of maintaining the water quality and function of the District's lakes, rivers and wetlands. The policy should be amended to recognise that it is not always possible to avoid adverse effects and therefore the word "avoid" should be deleted.

Relief sought

1. Amend policy 3.2.4.6.1 to read:

That Ensure that subdivision and / or development be adopts best practice, so that and is designed so as to avoid, remedy or mitigate adverse effects on the water quality of lakes, rivers and wetlands in the District.

Objective 3.2.4.7

4.33 Recognition of the importance of providing public access is supported. However, RPL considers that the policy could be improved by recognising that it is not only public access to the natural environment, but between natural environment and the built environment.

Relief sought

Amend objective and policy to read:

Objective 3.2.4.7 Facilitate Recognise and provide for public access to the natural environment.

Policies 3.2.4.7.1 Opportunities to provide Support a range of public access opportunities and linkages between the built environment to and the natural environment are sought at the time of plan change, subdivision or development.

Objective 3.2.4.8

- 4.34 RPL considers that while the objective and policy is laudable, it has not been properly considered and provides little guidance as to the intended application of the objective and policy. For example, it is not clear as to what responding positively to climate change actually means. RPL considers that any provision addressing climate change must be based on a clear and focused evidential basis.
- 4.35 Promoting higher density is supported provided it doesn't overwhelm existing infrastructure and, therefore, is better located in greenfield areas. Concentrating urban development within existing urban areas is supported. However, this needs to recognise that it is not necessarily efficient to increase the density of residential areas where they are not linked to places of employment.

Relief sought:

1. Delete objective 3.2.4.8 and Policy 3.2.4.8.1 **OR** Amend objective 3.2.4.8 and Policy 3.2.4.8.1 as follows:

Objective 3.2.4.8 Respond positively to Recognise and provide for the potential effects of Climate Change.

Policy 3.2.4.8.1 Concentrate development within existing urban areas, promoting Encourage higher density development in greenfield locations that enable the creation of live-work environments, reducing travel demands, and provision of new and efficient infrastructure.

Policy 3.2.4.8.2 Where practicable encourage the provision of alternative transportation modes that is are more energy efficient and supports public transport, to limit increases in greenhouse gas emissions in the District.

Policy 3.2.4.8.3 Recognise and support initiatives that help to create resilience to the potential impacts of climate change and how it might impact on tourism activities, particularly ski areas.

Goal 3.2.5 and Associated Objectives and Policies

- 4.36 As noted above, RPL has significant concerns about the veracity of the mapping of the ONL lines on the planning maps.
- 4.37 The goal, objective and policy are repetitive and interchange terms. RPL opposes the use of the word "protect" as it places a "dead hand" on land identified as ONL, which is not appropriate. There may be subdivision, use and development that could occur in ONL's that delivers an overall environmental benefit and, for example, enables people to actually experience an ONL rather than simply observe it.
- 4.38 The goal refers to protection of distinctive landscapes from "inappropriate development", reflecting the language of the RMA. However, the objective is to protect the natural character of landscapes from subdivision, use and development, and the policy is to protect the Outstanding Natural Landscapes and Outstanding Natural Features from

adverse effects of subdivision and development". The terminology is therefore inconsistent

Relief sought:

- 1. Amend the goal, objective and policy to read:
 - 3.2.5 Goal Our The values of our distinctive landscapes are protected from inappropriate development.

Objective 3.2.5.1 Protect the natural character of Outstanding Natural Landscapes and Outstanding Natural Features from Subdivision, use and development is undertaken in a manner which avoids, remedies or mitigates adverse effects on landscape values.

Policies 3.2.5.1.1 Identify the district's Outstanding Natural Landscapes and Outstanding Natural Features on the District Plan maps, and protect them from the avoid, remedy or mitigate the adverse effects of subdivision and development.

Objective 3.2.5.2 and Policy 3.2.5.2.1

4.39 The objective and policy seemed aimed at minimising effects in the "Rural Landscape Classification" areas. RPL considers that a similar approach should apply in all Rural areas and landscape classifications (noting the a similar approach is applied in the rules). Further, the objective and policy would be improved by using the terms of the Act, and managing effects of development.

Relief sought:

1. Amend Objective 3.2.5.2 and Policy 3.2.5.2.1 to better reflect the terminology used in the Act and to provide greater clarity as to the relationship between rural landscape classification and outstanding natural landscapes.

Objective 3.2.5.3 and Policy 3.2.5.3.1

- 4.40 The objective is supported to the extent that it recognises that development should be considered on a case by case basis, and should be located where it can be absorbed. The Policy is a repeat of Policy 3.2.2.1.2 and should be deleted.
- 4.41 The objective and policy assume that the UGB's have been located such that development within them can be absorbed. This is not necessarily the case as some areas within the UGB are fully developed and further infill development will adversely affect the character of those areas. Further, there may will be rural areas outside the UGB's that have the ability to absorb change without detracting from landscape values.

Relief sought:

- Amend objectives and policies to recognise that it is not only those areas that are located within the UGB's that have the potential to absorb change. Remove inconsistent use of terms.
- 2. Delete Policy 3.2.5.3.1. Incorporate Objective 3.2.5.3 as a policy under Objective 3.2.5.2.

Objective 3.2.5.4 and Policies 3.2.5.4.1 and 3.2.5.4.2

4.42 Provision for rural residential development is supported, but the reference to "finite" is not useful because it is axiomatic. Recognition of the need to manage cumulative effects is supported. Policy 3.2.5.4.2 is also supported. However, a greater level of guidance as to what is meant by appropriate locations would be useful.

Relief sought:

- 1. Amend Objective 3.2.5.4 by deleting the word "finite".
- 2. Retain Policies 3.2.5.4.1 and 3.2.5.4.2 which recognise the benefits associated with rural living.

Objective 3.2.5.5 and 3.2.5.5.1 and 3.2.5.5.2

4.43 RPL considers that the objective and policies place too great an emphasis on agricultural use and fail to recognise the diverse land use that occurs in rural areas (such as horticulture, tourism and recreation activities). The policies should recognise and encourage diversification.

Relief sought:

 Delete the objective and policies, or amend them to recognise that a variety of activities can contribute to rural character and achieve good environmental outcomes.

3.2.6 Goal and Associated Objectives and Policies

4.44 RPL considers that this section repeats many of the matters addressed elsewhere and is unnecessary. While RPL does not necessarily disagree with the content, many matters are better addressed at the rules level (such as CPTED).

Relief sought:

1. Delete section 3.2.6 or significantly reduce the number of objectives and policies.

3.2.7 Goal and Associated Objectives

4.45 These objectives are provided with no supporting policies, and are additional to section 5 which provides a full set of objectives and policies for this topic.

Relief sought:

Delete section 3.2.7.

5. Chapter 4: Urban Development

Purpose

- 5.1 The purpose of this chapter needs to recognise that it does not apply to the zones outside the scope of the PDP. Specifically, it should be clarified that it does not apply to the RPZ.
- 5.2 Further, this Chapter is lengthy and seems to largely be a repeat of the provisions for urban growth and development provided in the Strategic Directions Chapter.

Relief sought:

- 1. Delete section 4 and incorporate relevant provisions within the Strategic Directions Chapter to avoid repetition and unnecessary complexity.
- 2. If the chapter is retained, expressly exclude the RPZ.

Objective 4.2.1 and Associated Policies.

5.3 RPL considers that the objective and associated policies are a repeat of 3.2.2 of the Strategic Directions Chapter.

Relief sought:

- 1. Reconsider the relationship between this set of objectives and policies and those in the Strategic Directions Chapter, and consolidate in on place.
- 2. Delete all provisions that are repetitive in order to reduce complexity.

Objective 4.2.2 and Associated Policies

As noted above, RPL does not consider an urban growth boundary to be necessary or desirable. There is some equivocation in policy 4.2.2.5 where reference is made to reviewing and amending boundaries, which can only occur via a plan change. RPL consider that a specific mechanism should be included in the district plan to enable extensions to the urban growth boundary or urban activities outside the urban growth boundary.

Relief sought:

- 1. Delete the urban growth boundary. OR
- 2. Acknowledge the potential for extensions to the urban growth boundary or urban activities outside the urban growth boundary

Objective 4.2.3 and Associated Policies

- 5.5 RPL does not support increased density near existing town centres where it cannot be accommodated by existing infrastructure. RPL does, however, support recognition of the importance of utilising land and infrastructure efficiently provided this includes new infrastructure for existing zones.
- 5.6 RP considers that there is a significant amount of repetition between these objectives and policies and those contained in Chapter 3: Strategic Directions. In particular, the policies seem aimed at reducing Council's infrastructure costs rather than sound urban planning.
- 5.7 Policy 4.2.3.8 and its application needs to be considered carefully against the provisions specific to the Airport Mixed Use Zone and the Airport Designation. The amended provisions for the Airport Mixed Use Zone do not prohibit ASANs from within the Air Noise Boundary and therefore this policy is inconsistent with Section 17 of the Plan.

Relief sought:

1. Delete policies 4.2.3.2, 4.2.3.4, 4.2.3.5, 4.2.3.7.

- 2. Amend policy 4.2.3.6 to acknowledge connections to recreational, tourism and community facilities in rural areas.
- 3. Delete Policy 4.2.3.8 and amend the AMU to be consistent with policy 4.2.3.8.

Objective 4.2.4 and Associated Policies

- 5.8 RPL does not consider that limiting spatial growth is required to, or will deliver, the listed outcomes. RPL does not consider that there needs to be a policy that the role of the Queenstown Town Centre in relation to tourism and employment needs to be strengthened. Further, Frankton (in particular the RPZ) has a much wider role local commercial and industrial services.
- 5.9 RPL opposes policies that encourage infill development. It also opposes policies that seek to delay provisions of necessary infrastructure to existing urban zoned areas.
- 5.10 The policies relating to the Airport should not be in the section on urban development. They appear to conflict with the proposed Airport Mixed Use Zone.

Relief sought:

- 1. Delete objective and associated policies.
- 6. Chapter 5: Tangata Whenua

General Comments

6.1 The proposed provisions in Chapter 5 are numerous and provide strong directions that go beyond the requirements of the RMA. They are not appropriate and should be deleted, or amended so that they are more considered and consistent with the purpose and principles of the Act. While RPL supports aspects of the intent of this chapter, it considers that the research and analysis that would usually underpin such provisions is severely lacking.

Relief sought:

1. Delete proposed Chapter 5.

Objectives and Policies

- 6.2 It is not appropriate to ensure that Ngai Tahu are engaged in decision making. Decision making is the role of the local authority. The wording used in Section 4.3.4 of the Operative Plan is preferred.
- 6.3 The objective 5.4.2 is not immediately understandable. The policy is very directive and implies that in all building design collaboration with Ngai Tahu will be achieved, which is not supported. This objective and policy goes further than what is required in the Act.
- 6.4 Objective 5.4.3 and associated policies are also not readily understandable. The reader does not know what are "taonga species and habitats of significance to Ngāi Tahu".

6.5 Objective 5.4.5 indicates a further planning phase and the updating of planning maps. This should be done now if it is to form part of the review. Planning maps can only be altered by way of a plan change.

Relief sought:

1. Delete proposed Chapter 5.

7. Chapter 6: Landscapes

General Comments

- 7.1 RPL considers that Queenstown's landscapes are worthy of recognition and careful management. They are critical to Queenstown's image and its reputation.
- 7.2 However, RPL considers that a more fine grain analysis of the district's landscapes and appropriate use and development within is required. In particular, the ONL classification near the RPZ (along the Kawarau River) contains many anomalies (for example, the Shotover River is highly modified and the are man made structures along this stretch of the Kawarau River) and severely restricts development on flat land near existing urban centres and infrastructure.
- 7.3 RPL seeks that the ONL line be removed from this part of the Kawarau River and placed along the foot of the slopes of the northern face of the Remarkables. It also seeks that development be enabled within ONL's where a net environmental benefit is derived.
- 7.4 RPL considers that farming activities are not better than some other activities in terms of retaining character (for example, tourism and recreation activities). The issue to be managed is the scale and location of the activity. It opposes farming activities being given exclusive status in the Rural Zone.

Relief sought:

- 1. Amend the objectives and policies enable development within ONL's where a net environmental benefit is derived.
- 2. Amend the objectives and policies to acknowledge that other types of activities that can locate in the rural area and that maintain the landscape character (such as tourism, commercial and recreational activities).
- Move the ONL line near the RPZ to the foot of the slopes of the northern face of the Remarkables

8. Chapter 12: Queenstown Town Centre

General Comments

- 8.1 The PDP proposes an extension to the Town Centre Zone so that it includes land located on Brecon Street. This land includes the gondola base building, the Kiwi Birdlife Park, and the Indoor Golf facility. The PDP also adds the site between Memorial Street and Shotover Street as part of the Transition Sub-zone.
- 8.2 The building height restriction has been removed from the maps and no longer applies to that part of Brecon Street now zoned Town Centre Zone.

- 8.3 Under Plan Change 50 the land between Man Street and Isle Street was proposed to be zoned Town Centre zone, and the Town Centre Zone would extend west to Glasgow Street. The PDP does not reflect Plan Change 50, and the land subject to the Plan Change 50 amendments is zoned High Density Residential in the PDP.
- 8.4 Objective 12.2.4 and associated Policies are supported in that they recognise the importance of retaining a compact town centre that is safe and easily accessible for both visitors and residents. This recognises that if the town centre is to extend, any extension should not expand the town centre in such a way that its walkability is reduced. The Town Centre Zone in the PDP is supported and is considered better than the PC50 proposal.

Relief sought:

- 1. Retain the High Density Residential Zoning of land to the north of Man Street.
- 2. Retain objective 12.2.4 and associated policies, particularly policy 12.2.4.2,

12.1 Zone Purpose - Town Centre

8.5 Section 12.1 identifies the purpose of the Town Centre Zone. Paragraph 2 identifies that

"It serves as the principal administrative centre for the District and offers the greatest variety of activities for residents and visitors."

8.6 This statement is not supported as it fails to recognise that as the District grows, the Queenstown town centre may not continue to provide the administrative centre of the District. It is recognised that it will always provide an important destination, however, it must be recognised that as the District grows many of the administrative functions, tourism and residential services will be located in Frankton. This change is a natural progression as the District grows, and will ensure that the Queenstown Town Centre can retain its amenity values. The PDP must not seek to artificially constrain development in Frankton.

Relief sought:

1. Amend the Zone purpose to recognise that the Queenstown Town Centre may not the administrative centre of the District.

Objective 12.2.5 and Associated Policies

- 8.7 The recognition in the objective and policies of the importance of creating a dynamic and vibrant waterfront is supported. However, the meaning of Policy 12.2.5.2 is unclear. The appears to be a conflict between policies 1 and 3. RPL supports water based activities and the provisions of a water ferry service to the RPZ. The objective and policies should recognise the importance of providing for water based public transport, and that these activities will need to be supported by infrastructure on the lake shore. Providing for water based public transport also re-emphasises the importance of providing a walkable town centre that residents and visitors can access via public transport.
- 8.8 RPL considers the maintenance of pedestrian accessibility is important, and this relates to the importance of retaining the Town Centre's compact and walkable size.

Relief sought:

 Retain objective 12.2.5 and associated policies, subject to deletion of policy 12.2.5.3 and recognition of the importance of retaining a compact town centre that is easily accessible and walkable. 2. Amend the objective and policies so that they recognise the importance of providing public transport links on the water, and that this may involve expansion to existing jetties and structures to provide necessary infrastructure.

Town Centre Zone Rules

8.9 RPL seeks the following rule amendments.

Relief sought:

- 1. Amend Rule 12.4.7.1 to replace the discretionary activity status for wharfs and jetties within the Town Centre Waterfront Zone with controlled activity status.
- 2. Amend maps 35 and 36 to provide better clarity around the extent of the Town Centre waterfront zone.
- Amend Rule 12.4.7.2 to better reflect the outcomes sought by the objectives and policies, and to recognise the importance of providing for water based public transport.
- Amend Rule 12.4.7.2 to replace the discretionary activity status for Commercial Surface of Water Activities within the Queenstown Town Centre Waterfront Zone with controlled activity status.
- 5. Delete the non-complying activity rule for buildings located on jetties and wharves. If the rule is retained, then it should be amended to exclude provision of buildings that are for the purpose of providing water based public transport facilities.
- 9. Chapter 27: Subdivision and Development

General Comments

9.1 The PDP excludes the RPZ from Chapter 27. That is supported.

Relief sought:

- Retain exclusion of RPZ.
- 10. Queenstown Airport- Mixed Use Zone, Designation and Plan Change 35

Clarification - Definitions from Plan Change 35

10.1 The definitions section of the PDP includes underlined definitions that have arisen out of Plan Change 35 (**PC35**). These are supported provided they are consistent with PC35.

Queenstown Airport Mixed Use Zone - 17.1 Zone purpose

10.2 Identifying the importance of the airport to tourism is recognised and supported. However, the introduction would be improved by removing repetition.

Relief sought:

1. Amend the zone purpose to remove repetition, for instance the introduction could be amended to read:

Queenstown Airport is the gateway to Queenstown and is a key asset that provides facilities for the transportation of people and freight. The Airport is a key contributor to the tourism industry and generates significant economic growth at a district, regional and national level.

The airport also provides local facilities, including helicopter, flightseeing and general aviation operations. It is also a critical provider of emergency services and is a lifeline under the Civil Defence Emergency Management Act 2002.

The Airport Mixed Use Zone provides for the future growth and development of the airport in a manner that recognises the importance of maintaining amenity values of the airport and its surrounds.

Objective and Policies

General Comments

- 10.3 The operative objectives and policies better provided for the purpose of the Airport Mixed Use Zone, and the management of the airport facilities. It is requested that the operative provisions are not amended as proposed.
- 10.4 The proposed provisions provide greater flexibility within the Airport Mixed Use Zone, meaning that activities. RPL has no particular issue with this, but considers that its land within Activity Area 8 should be similarly zoned. It fails to see why ASANs should be restricted on its land but not on land owned by the QAC.

Relief sought:

- If the existing Airport Mixed Use Zone is to be amended to enable a range of activities including ASANs, then Activity Area of the RPZ be amended to also enable the same range of activities; OR
- The noise restrictions imposed on the RPZ under PC35 be imposed on the QAC (noting the comments above regarding the status of PC35 and the Lot 6 Notice of Requirement).
- 10.5 The planning maps indicate that all land owned by the QAC and/or which is subject to the aerodrome designation is to be zoned Airport Mixed Use Zone. That is opposed for all the land not zoned Airport Mixed Use Zone in the operative plan because it is inconsistent with the use of that land for aerodrome purposes.

Relief sought:

- 1. Delete the extension of the Airport Mixed Use Zone from land not currently zoned Airport Mixed Use Zone.
- 2. Delete Policy 17.2.1.3.
- 3. Retain the existing Airport Mixed Use Zone rules in relation to height, setbacks, building coverage, landscaping.

Airport Designation

Amendment to list of permitted activities

10.6 Item (f) of the list of permitted activities is extremely liberal and potentially makes a range of activities permitted.

Relief sought:

- 1. Delete item (f) OR.
- 2. Amend item (f) to specifically list the activities that are permitted.

Building Height

10.7 The increase in building height is opposed as it is not necessary for aerodrome uses and is consistent with the surrounding commercially zoned land (which is also subject to design control rules).

Relief sought:

 Retain operative height provisions for the airport so that the maximum height for buildings is 9m. Delete the exception for hangars, so that the 9m height limit applies.

Building setbacks

10.8 This proposed change to the designation is consistent with the proposed changes to the Airport Mixed Use Zone. As per RPL's submission on the Airport Mixed Use Zone, the reduction in building setbacks is opposed.

Relief sought:

Retain existing designation setback.

Strip Width

10.9 An amendment is proposed to widen the strip width from 75m to 150m. This is opposed as it has implications for the RPZ in relation to the take off/climb approach slopes and other plans/controls within the RPZ.

Relief sought

1. Retain the 75m strip width.

Prohibition of non-airport related activities

10.10 The prohibition of non-airport related activities within the airport designation has been removed. There is no proper reasons given for this.

Relief sought

1. Retain the prohibition of non-airport related activities within the airport designation.

11. Designations

Wakatipu High School

11.1 The designation for Wakatipu High School located within the RPZ has not been identified on the planning maps, or within the Designation Section.

Relief sought:

- 1. Amend the designations section to include the approved designation for the Wakatipu High School located within the RPZ and also update the planning maps to include the designation in its correct location.
- 12. RPL seeks the following decision from the Council
- 12.1 The PDP be amended to address the matters raised in this submission.
- 12.2 Any consequential or alternative relief required to give effect to the matters raised in this submission.
- 13. RPL wishes to be heard by the Council in support of its submission
- 14. If others make a similar submission RPL will consider presenting a joint case with them at a hearing

REMARKABLES PARK LIMITED by its lawyers and duly authorised agents **Brookfields** per:

DATED the 23rd day of October 2015

Address for Service:

C/- Jenny Carter
Remarkables Park Limited
PO Box 1075
QUEENSTOWN
j.carter@remarkablespark.com

REMARKABLES PARK LIMITED - FURTHER SUBMISSION ON THE QUEENSTOWN LAKES PROPOSED DISTRICT PLAN

TO: QUEENSTOWN LAKES DISTRICT COUNCIL

Private Bag 50077

Queenstown

NAME: REMARKABLES PARK LIMITED

Attn: Jenny Carter

PO Box 1075

QUEENSTOWN 9348

This is a further submission on the Queenstown Lakes District Council's Proposed District Plan (PDP). Remarkables Park Limited (RPL) has an interest greater than the public generally. RPL owns a 150ha development site in Frankton. The Remarkables Park Zone (RPZ) has been excluded from the District Plan Review, however, there are changes proposed that affect RPZ. Therefore RPL has an interest greater than the public generally.

The attached table (Attachment A) is by submitter number and records the submissions that RPL supports and/or opposes together with the reasons for each further submission.

RPL wishes to be heard in support of this further submission.

If others present a similar submission RPL will consider presenting a joint case with them at the hearing.

Dated: 18 December 2015

Young / R A Davidson

Counsel for Remarkables Park Limited

ATTACHMENT A: FURTHER SUBMISSIONS TABLE

	Submitter	Submitte r number	Provision	Support/ oppose	Reason
	Elizabeth Hanan	10.7	57-3 Strategic Direction > 59-3.2 Goals, Objectives and Policies > 60-3.2.1 Goal 1.	Oppose	Support recognition that RPZ has a commercial zoning as well as Queenstown and Frankton
73	Krain Fround	19.2	57-3 Strategic Direction > 59-3.2 Goals, Objectives and Policies	Oppose	For the reasons outlined in RPL's primary submission, oppose to the extent that the notified provisions do not recognise the Remarkables Park Zone appropriately in the centres hierarchy.
છ		19.4	48-\tau "Heading 5,5" 5 Tangata Whenua > 50-5.2 Ngai Tahu / Kai Tahu	Oppose	For the reasons outlined in RPL's primary submission.
4.	Alison Walsh	21.9	57-3 Strategic Direction	Oppose	For the reasons outlined in RPL's primary submission, oppose to the extent that the notified provisions do not recognise the Remarkables Park Zone appropriately in the centres hierarchy
ب	Maggie Lawton	17.1	57-3 Strategic Direction	osoddo	For the reasons outlined in QPL's primary submission, oppose to the extent that the submission supports the strategic directions chapter as notified.
6,	E J L Guthrie	212	464-12 Queenstown Town Centre	Oppose	The proposed Queenstown Town Centre zone cannot be properly assessed or approved until it is cosidered in conjunction with Plan Change 50.
7.		238.3	81-6 Landscape	Support	Support recognition that farmers are not museum curators; land use change needs to be enabled to achieve sustainable management.
∞	NZIA Southern and Architecture + Women Southern	238.36	11-4 Urban Development > 13-4.2 Objectives and Policies > 37- 4.2.4 Objective 4	Support	The submitter supports the location of the Queenstown Urban Growth Boundary in part. Requests greater recognition of Frankton as another separate township with improved opportunities as a mixed use and commercial business location. Encouraging, high end retail, a hospitality precinct, direct links by gondola to the local ski field and a diverse mix of both local and visitor accommodation. Recognition of Frankton's importance and the linkage to the ski field by gondola is supported and recognises

For the reasons stated in the submission	Support	57-3 Strategic Direction > 59-3.2 Goals,	1.162	Powerner	25
Support for the reasons given in the submission	Support	57-3 Strategic Direction > 59-3.2 Goals, Objectives and Policies > 60-3.2.1 Goal 1. > 61-3.2.1.1 Objective 1. > 64-3.2.1.1.3	249.5	Limited	38.
Support for the reasons given in the submission	Support	57-3 Strategic Direction > 59-3.2 Goals, Objectives and Policies > 60-3.2.1 Goal 1. > 61-3.2.1.1 Objective 1.	249.2	Willowridge	17.
Support for the reasons given in the submission and the reasons in RPL's primary submission.	Support	464-12 Queenstown Town Centre > 584- 12.6 Non- Notification of Applications	243	Christine Byrch	16.
The definition of ski area activities is appropriate and provides for the activities anticipated within a ski field.	Oppose	54-2 Definitions	243.44		15.
Given the importance of the ski fields to the local, regional and national economy, it is appropriate that they are supported by the District Plan.	Oppose	771-21 Rural Zone > 773-21.2 Objectives and Policies > 797-21.2.6 Objective - 6.	243.21	Christine Byrch	14.
Frankton Arm and Kawarau River provides important opportunity for ferry network,	Support	57-3 Strategic Direction > 59-3.2 Goals, Objectives and Policies > 60-3.2.1 Goal 1. > 73-3.2.1.5 Objective 5	238.138		13.
Support recognition of Frankton, particularly the RPZ, being a vibrant, mixed use town centre that attracts visitors and supports local commercial services taking advantage of RPZ's central location and distinct amenity.	Support	57-3 Strategic Direction > 59-3.2 Goals, Objectives and Policies > 60-3.2.1 Goal 1. > 65- 3.2.1.2 Objective 2.	238.137		12.
The additional text recognises the importance of RPZ and Queenstown Park, and the opportunities presented by its close association with Kawarau River.	Support	57-3 Strategic Direction > 59-3.2 Goals, Objectives and Policies > 60-3.2.1 Goal 1. > 61- 3.2.1.1 Objective 1. > 62- 3.2.1.1.1.	238.136		. 1
Importance of ferry linkages supporting public transport options is supported, and as part of this it is important to recognise the need for jetties.	Support	464-12 Queenstown Town Centre > 466- 12.2 Objectives and Policies > 489-12.2.4 Objective 4 > 494-12.2.4.5	238.76		10.
Support recognition of Frankton as a township with distinctive identity supported by community activities.	Support	11-4 Urban Development > 13-4.2 Objectives and Policies > 37- 4.2.4 Objective 4 > 38-4.2.4.1	238.38		<u>ග</u>
the importance of the RPZ and its ability to provide linkage between urban development and the Remarkables ski field.			:	ļ	

	Limited		Objectives and Policies > 60-3.2.1 Goal 1 > 73-3.2.1.5 Objective 5		
20.		251.26	26-30 Energy and Utilities > 83-30.4 Rules Sup - Activities > 114-30.4.16	Support	Discretionary activity status is adequate to adequately address potential adverse effects from buildings associated with utilities. Note that the Remarkables Park Zone is exempt from the District Plan review, and therefore should be deleted from this rule.
			10-Entire Plan		The Queenstown Airport is adequately protected from
			54-2 Definitions > 56- 2.2 Definitions		Plan and Plan Change 50.
			57-3 Strategic Direction > 59- 3.2 Goals, Objectives and Policies > 60-3.2.1 Goal 1. > 73- 3.2.1.5 Objective 5		Queenstown Airport should strive to minimise the adverse effects genearted by it.
			57-3 Strategic Direction > 59- 3.2 Goals, Objectives and Policies > 74-3.2.2 Goal 2 > 75- 3.2.2.1 Objective 1	<u> </u>	Oppose all amendments that seek to place additional restrictions on existing urban zones such as the Remarkables Park Zone.
21.	Board of Airline Representative	271	57-3 Strategic Direction > 59- 3.2 Goals, Objectives and Policies > 74-3.2.2 Goal 2 > 75- 3.2.2.1 Objective 1 > 78-3.2.2.1.3	esoddo	Opoose all amendments that seek to undermine or circumvent the Plan Change 35 and Lot 6 NoR proceedings that are currently before the Environment Court.
	Zealand		11-4 Urban Development > 13- 4.2 Objectives and Policies > 14- 4.2.1 Objective 1 > 16-4.2.1.2		Oppose all amendments that seek to enable urban actiuvities on airport land where such activites are constrained on land adjoining or near the airport (Frankton and Remarkables Park).
			11-4 Urban Development > 13- 4.2 Objectives and Policies > 28- 4.2.3 Objective 3 > 29-4.2.3.1		Oppose all amendments that seek to reduce open space or buffer areas between the airport and adjoining urban zones.
			11-4 Urban Development > 13- 4.2 Objectives and Policies > 28- 4.2.3 Objective 3 > 36-4.2.3.8		Oppose all amendments that seek to constrain any existing development opportunity within the Remarkables Park Zone.
			11-4 Urban Development > 13- 4.2 Objectives and Policies > 37- 4.2.4		Any amendments or provisions supported/opposed by

			Objective 4 > 39-4.2.4.2		QAC that seek to achieve any of the outcomes set out
			11-4 Urban Development > 13- 4.2 Objectives and Policies > 37- 4.2.4 Objective 4 > 40-4.2.4.3.		
_	_		138-7 Low Density Residential > 184-7.4 Rules - Activities > 199- 7.4.11		
			138-7 Low Density Residential > 217-7.5 Rules - Standards > 227- 7.5.3		
			138-7 Low Density Residential > 217-7.5 Rules - Standards > 228- 7.5.4		
			138-7 Low Density Residential > 217-7.5 Rules - Standards > 230- 7.5.6		
			739-17 Queenstown Airport Mixed Use		
			771-21 Rural Zone > 773- 21.2 Objectives and Policies > 801-21.2.7 Objective - 7		
			771-21 Rural Zone > 853- 21.4 Rules - Activities > 882- 21.4.29		
			1182-27 Subdivision and Development > 1253-27.5 Rules - Standards for Subdivision Activities > 1254-27.5.1		
			26-37 Designations		
22.					
23.	Debbie MacColl	285.6	11-4 Urban Development > 13- 4.2 Objectives and Policies > 37- 4.2.4 Objective 4	Oppose	The use of the airport should be balanced with the need to protect amenity values
24.	Rob Jewell	300.1	48-5 Tangata Whenua	Support	For the reasons outlined in RPL's primary submission.
25.	Well Smart	308	464-12 Queenstown Town Centre	Oppose	For the reasons outlined in the submission and in

31611553:629885

	Investment Holding				RPL's primary submission.
	(NZQN) Limited				
26.	Nevis Jones	324.1	8-General DP Review Comments	Support	For the reasons outlined in RPL's primary submission.
27.	Nic	335.18	1182-27 Subdivision and Development > 1249-27.4 Rules – Subdivision > 1250-27.4 1 Discretionary Activities	Support	For the reasons outlined in RPL's primary submission.
28.	Demicinassen	335.32	1182-27 Subdivision and Development > 1361-27.12 Financial Contributions	Oppose	For the reasons outlined in RPL's primary submission.
29.	Middleton Family Trust	338.2	7-Part Seven - Maps > 7.33-Map 31 - Lower Shotover	Support	Support the proposed rezoning; the land is capable of providing a long term location for airport facilities.
30.	Evan Alty	339.1	9-1 Introduction	Oppose	For the reasons outlined in RPL's primary submission.
	Stanley Street Investments		464-12 Queenstown Town Centre		Support the integration of Plan Change 50 into the
- 3	Limited and Street		7-Part Seven - Maps > 7.39-Map 36 -	Support/	District Plan.
31.	Limited and	394	Queenstown Central	Oppose	Oppose the overall extent and location of the
	Kelso		7-Part Seven - Maps > 7.39-Map 36 -		Queenstown Town Centre when both Plan Change 50
	Limited		Queenstown Central		and the District Fall Neview are considered
32.	James Cooper	400.5	10- Entire Plan	Oppose	For the reasons outlined in RPL's primary submission.
	Clark Fortune		1182-27 Subdivision and Development >		
33.	McDonald & Associates	414.3	1253-27.5 Rules – Standards for Subdivision Activities	Support	For the reasons outlined in RPL's primary submission.
34.	Aviemore Corporation Ltd	418.1	7-Part Seven - Maps > 7.34-Map 31a - Queenstown Airport	Support	The submitter's land should be zoned industrial given its location
35.	Two Degrees Mobile Limited	421.2	54-2 Definitions > 56-2.2 Definitions	Oppose	RPL is excluded from the District Plan review, and therefore any amendments to the definitions, as suggested by the submitter, should not apply to the RPZ.
36.	Carol Bunn	423.5	1182-27 Subdivision and Development > 1249-27.4 Rules –Subdivision > 1250-27.4.1 Discretionary Activities	Support	For the reasons outlined in RPL's primary submission.
37.	Queenstown	433.1 to	Definitions, 57-3 Strategic Direction > 59-	Oppose	Oppose all amendments to definitions that are

Airport Corporation	433.132	3.2 Goals, Objectives and Policies > 60- 3.2.1 Goal 1. > 73-3.2.1.5 Objective 5	inconsistent with Plan Change 35
		11-4 Urban Development	Oppose all amendments to any provisions that seek to impose controls in addition to those proposed under Plan Change 35.
		11-4 Urban Development > 13-4.2 Objectives and Policies > 22-4.2.2 Objective 2.	Oppose all amendments that seek to place additional restrictions on existing urban zones such as the
		11-4 Urban Development > 13-4.2 Objectives and Policies > 37-4.2.4 Objective 4 > 40-4.2.4.3.	Opoose all amendments that seek to undermine or circumvent the Plan Change 35 and Lot 6 NoR
		11-4 Urban Development > 13-4.2 Objectives and Policies > 37-4.2.4 Objective 4 > 41-4.2.4	Court. Court.
		138-7 Low Density Residential > 140-7.2 Objectives and Policies > 148-7.2.3 Objective 3	actitudities on airport land where such activities are constrained on land adjoining or near the airport (Frankton and Remarkables Park).
		138-7 Low Density Residential > 140-7.2 Objectives and Policies > 152-7.2.4 Objective 4	Oppose all amendments that seek to reduce open space or buffer areas between the airport and adjoining urban zones.
		138-7 Low Density Residential > 140-7.2 Objectives and Policies > 174-7.2.10	Oppose all amendments that seek to constrain any existing development opportunity within the Remarkables Park Zone.
		138-7 Low Density Residential > 140-7.2 Objectives and Policies > 174-7.2.10 > 176-7.2.10.2	Any amendments or provisions supported/opposed by QAC that seek to achieve any of the outcomes set out above be rejected.
		138-7 Low Density Residential > 184-7.4 Rules - Activities 200-7.4.12	
		138-7 Low Density Residential > 217-7.5 Rules - Standards > 230-7.5.6	

138-7 Low Density Residential > 251-7.6 Non-Notification of Applications
685-15 Local Shopping Centres > 686- 15.1 Zone Purpose
685-15 Local Shopping Centres > 687- 15.2 Objectives and Policies > 699-15.2.3 Objective 3
685-15 Local Shopping Centres > 711- 15.4 Rules - Activities 85-15 Local Shopping Centres > 711-15.4 Rules - Activities > 714-15.4.3
685-15 Local Shopping Centres > 732- 15.6 Non-Notification of Applications
739-17 Queenstown Airport Mixed Use > 740-17.1 Zone Purpose
739-17 Queenstown Airport Mixed Use > 741-17.2 Objectives and Policies
739-17 Queenstown Airport Mixed Use > 750-17.3 Other Provisions and Rules > 752-17.3.2 District Wide
 739-17 Queenstown Airport Mixed Use > 766-17.5 Rules - Standards
739-17 Queenstown Airport Mixed Use > 791-17.6 Non-Notification of Applications
739-17 Queenstown Airport Mixed Use > 793-17.7 Non Regulatory Methods

553:629885
Ë
316
.,

Purpose 771-21 Rural Zone > 773-21.2 Objectives and Policies > 801-21.2.7 Objective - 7 771-21 Rural Zone > 773-21.2 Objective - 7 771-21 Rural Zone > 773-21.2 Objective - 8 > 807-21.2.8.1 1182-27 Subdivision and Development > 1184-27.2 Objectives and Policies - 6 district wide > 1193-27.2.2 Objective 2 1182-27 Subdivision and Development > 1253-27.5 Rules - Standards for Subdivision Activities > 1254-27.5.1 1182-27 Subdivision and Development > 1352-27.9 Rules - Non-notification of Applications > 1353-27.9.1 1185-35 Temporary Activities and Relocated Buildings > 187-35.2 Objective 1 185-35 Temporary Activities and Relocated Buildings > 237-35.5 Rules - Standards 185-35 Temporary Activities and Relocated Buildings > 242-35.6 Rules - Standards 1245-36 Noise > 252-36.4 Rules - Activities > 258-36.4.6

31611553:629885

2		
S S S S S S S S S S S S S S S S S S S		
2		
>		
_		

		245-36 Noise		
		245-36 Noise > 278-36.6 Airport Noise		
		245-36 Noise > 260-36.5 Rules- Standards > 262-36.5.2		
		7-Part Seven - Maps > 7.34-Map 31a = Queenstown Airport		
		7-Part Seven - Maps > 7.36-Map 33 - Frankton		
_		26-37 Designations	_	
		26-37 Designations > 86-D.Queenstown Airport		
		26-37 Designations > 28-37.2 Schedule of Designations		
		7-Part Seven - Maps > 7.34-Map 31a - Queenstown Airport		
		57-3 Strategic Direction > 59-3.2 Goals, Objectives and Policies > 109-3.2.5 Goal 5		
α α	433.1 to	57-3 Strategic Direction > 59-3.2 Goals, Objectives and Policies	1	The functional and operational constraints of significant infrastructure should be a relevant
	433.132	81-6 Landscape > 83-6.2 Values	noddne	consideration. However, and policy recignition should not be limited to existing nfrastructure and should
		81-6 Landscape > 84-6.3 Objectives and Policies > 85-6.3.1 Objective 1	-	include new initiastructure.
		81-6 Landscape > 84-6.3 Objectives and	i	

			Policies > 104-6.3.3 Objective 3		
			81-6 Landscape > 84-6.3 Objectives and Policies > 107-6.3.4 Objective 4		
			81-6 Landscape > 84-6.3 Objectives and Policies > 112-6.3.5 Objective 5	<u>. </u>	
			771-21 Rural Zone > 1011- 21.7 Assessment Matters (Landscapes) > 1012-21.7.1 ONF and ONL		
			1-28 Natural Hazards > 5-28.3 Objectives and Policies > 6-28.3.1 Objective 1 1-28 Natural Hazards > 5-28.3 Objectives and Policies > 12-28.3.2 Objective 2 > 13-28.3.2.1		
39.		453.1	1182-27 Subdivision and Development > 1249-27.4 Rules - Subdivision > 1250-27.4.1 Discretionary activities	Support	Making subdivision a discretionary activity imposes unnecessary costs and complexity
40.	Paterson Pitts Partners (Wanaka) Ltd	453.10	1182-27 Subdivision and Development > 1184-27.2 Objectives and Policies – district wide > 1185-27.2.1 Objective 1. > 1186-27.2.1.1	Support	Concur that the subdivision section should not refer to a separate code of practice
41.		453.21	1182-27 Subdivision and Development > 1184-27.2 Objectives and Policies – district wide > 1214-27.2.5 Objective 5 > 1225-27.2.5.11	Support	Support submitter's opposition to 27.2.5.11 as these costs should be covered by development contributions.
42.	S Jones	493.1	1182-27 Subdivision and Development > 1249-27.4 Rules – Subdivision > 1250-27.4.1 Discretionary activities	Support	For the reasons outlined in RPL's primary submission.
43.	Arcadian Triangle Limited	497.17	1182-27 Subdivision and Development > 1249-27.4 Rules – Subdivision > 1250-27.4.1 Discretionary activities	Support/ oppose	For the reasons outlined in RPL's primary submission, support that part of the submission point seeking controlled activity status for subdivision, but oppose that part seeking to maintain discretionary activity status in the rural zone.

44.	Woodlot Properties Limited	501.13	1182-27 Subdivision and Development > 1249-27.4 Rules – Subdivision > 1250-27.4.1 Discretionary activities	Support	For the reasons outlined in RPL's primary submission.
45.		515.14	81-6 Landscape > 84-6.3 Objectives and Policies > 98-6.3.2 Objective 2 > 100-6.3.2.2	Support	For the reasons outlined in RPL's primary submission.
46.	Wakatipu Equities	515.37	1182-27 Subdivision and Development > 1249-27.4 Rules – Subdivision > 1250-27.4.1 Discretionary activities	Support/	For the reasons outlined in RPL's primary submission, support that part of the submission point seeking controlled activity status for subdivision, but oppose that part seeking to maintain discretionary activity status in the rural zone.
47.	New Zealand Tungsten Mining Limited	519.15	57-3 Strategic Direction > 59-3.2 Goals, Objectives and Policies, 109-3.2.5 Goal 5 > 110-3.2.5.1 Objective 1	Support	For the reasons outlined in RPL's primary submission.
48.		520.4	1182-27 Subdivision and Development	Support	Subdivision should be a controlled activity to avoid unnecessary complexity and costs
49.	Fred van Brandenburg	520.5	1182-27 Subdivision and Development > 1249-27.4 Rules - Subdivision > 1250-27.4.1 Discretionary activities	Support	Subdivision should be a controlled activity to avoid unnecessary complexity and costs
50.		520.6	1182-27 Subdivision and Development	Support	Subdivision should be a controlled activity to avoid unnecessary complexity and costs
51.	Robert and Elvena Heywood	523.14	1182-27 Subdivision and Development > 1249-27.4 Rules – Subdivision > 1250-27.4.1 Discretionary activities	Support/ oppose	For the reasons outlined in RPL's primary submission, support that part of the submission point seeking controlled activity status for subdivision, but oppose that part seeking to maintain discretionary activity status in the rural zone.
52.		524.1		Oppose	Amendment to the definition of Education Facilities is not necessary.
53.	Ministry of	524.2		Oppose	Amendment to the definition of community activity (deleting reference to schools) is not necessary.
54.	Education	524.3	54-2 Definitions	Support	Amendment to the definition of community facility so that it applies to all land (not just land in a community facility sub-zone) and includes education facilities is supported
55.		524.4		Oppose	The amendment to the definition of day care facility is

					not necessary.
56.		524.5	57-3 Strategic Direction > 59-3.2 Goals, Objectives and Policies > 74-3.2.2 Goal 2 > 75-3.2.2.1 Objective 1 > 79-3.2.2.1.4	Support	It is logical to co-locate higher density residential development with educational and community facilities to enable a live-work environment
57.	Larchmont Developments Limited	527.4	1182-27 Subdivision and Development > 1249-27.4 Rules – Subdivision > 1250-27.4.1 Discretionary activities	Support and Oppose	For the reasons outlined in RPL's primary submission, support that part of the submission point seeking controlled activity status for subdivision, but oppose that part seeking to maintain discretionary activity status in the rural zone.
58.	Lakes Edge Development Ltd	529.5	1182-27 Subdivision and Development > 1249-27.4 Rules – Subdivision > 1250-27.4.1 Discretionary activities	Support and Oppose	For the reasons outlined in RPL's primary submission, support that part of the submission point seeking controlled activity status for subdivision, but oppose that part seeking to maintain discretionary activity status in the rural zone.
59.	Byron Ballan	530.14	1182-27 Subdivision and Development > 1249-27.4 Rules – Subdivision > 1250-27.4.1 Discretionary activities	Support and Oppose	For the reasons outlined in RPL's primary submission, support that part of the submission point seeking controlled activity status for subdivision, but oppose that part seeking to maintain discretionary activity status in the rural zone.
90.	High Peaks Limited	545.5	1182-27 Subdivision and Development > 1249-27.4 Rules – Subdivision > 1250-27.4.1 Discretionary activities	Support and Oppose	For the reasons outlined in RPL's primary submission, support that part of the submission point seeking controlled activity status for subdivision, but oppose that part seeking to maintain discretionary activity status in the rural zone.
61.	Maximum Mojo Holdings Limited	548	464-12 Queenstown Town Centre 7-Part Seven - Maps > 7.39-Map 36 - Queenstown Central 26-9 High Density Residential	Support and Oppose	Support the integration of Plan Change 50 into the District Plan. Oppose the overall extent and location of the Queenstown Town Centre when both Plan Change 50 and the District Plan Review are considered.
62.	Ngai Tahu Property Limited	550.5	1182-27 Subdivision and Development > 1249-27.4 Rules – Subdivision > 1250-27.4.1 Discretionary activities	Support and Oppose	For the reasons outlined in RPL's primary submission, support that part of the submission point seeking controlled activity status for subdivision, but oppose that part seeking to maintain discretionary activity status in the rural zone.
63.	Kerry Dunlop,	553.1	26-37 Designations	Neutral	Recognise that if the location of the bridge crosses

	David Hay, Adam Childs, Sir Fion doar				RPL land there are implications for development within the RPZ and therefore RPL should be a part of
	Or Ralph Hanan,				any discussions
_	Hudson Turnbull, Kevin				
	Conaghan,				
	Simon Hayes, Alan Millar, Bill				
	and Kirsty Sharpe				
2	Skyline	77	1182-27 Subdivision and Development >		Agree that making subdivision discretionary imposes
	Limited	556.11	1249-27.4 Kules - Subdivision > 1250- 27.4.1 Discretionary activities	Support	unnecessary costs and complexity
			1182-27 Subdivision and Development >		
65.		567.13	1249-27.2 Objectives and policies -	Support	For the reasons outlined in RPL's primary submission.
	Wild Grass		District wide		
	Partnership,				
.99	Wild Grass	567.14	1249-27.5 Rules - Standards for	Support	For the reasons outlined in RPL's primary submission.
	Investments		Subdivision Activities		
67.	No 1 Limited and Horizons	567.15	1182-27 Subdivision and Development > 1249-27.4 Rules - Subdivision	Support	For the reasons outlined in RPL's primary submission.
	Investment		1182-27 Subdivision and Development >		
68.	ırıst	567.16	1249-27.2 Objectives and policies – District wide > 1185-27.2.1 Objective 1 >	Support	For the reasons outlined in RPL's primary submission.
			1186-27.2.1.1		
69.	Air New	584.2	8-General DP Review Comments	Support	For the reasons outlined in RPL's primary submission.
70.	Zealand Limited	584.3	54-2 Definitions > 56-2.2 Definitions	Support	For the reasons outlined in RPL's primary submission.
71.	Stratorra	598.15	57-3 Strategic Direction > 59-3.2 Goals, Objectives and Policies, 109-3.2.5 Goal 5 > 110-3.2.5.1 Objective 1	Support	For the reasons outlined in RPL's primary submission.
72.		598.16	57-3 Strategic Direction > 59-3.2 Goals, Objectives and Policies, 109-3.2.5 Goal 5 > 110-3.2.5.1 Objective 1 > 111-3.2.5.1.1	Support	For the reasons outlined in RPL's primary submission.

73.		598.17	57-3 Strategic Direction > 59-3.2 Goals, Objectives and Policies, 109-3.2.5 Goal 5 > 112-3.2.5.2 Objective 2	Support	For the reasons outlined in RPL's primary submission.
74.		598.18	57-3 Strategic Direction > 59-3.2 Goals, Objectives and Policies, 109-3.2.5 Goal 5 > 112-3.2.5.2 Objective 2 > 113-3.2.5.1	Support	For the reasons outlined in RPL's primary submission.
75.		598.25	81-6 Landscape > 84-6.3 Objectives and Policies > 85-6.3.1 Objective 1 > 88-6.3.1.3	Support	For the reasons outlined in RPL's primary submission.
76.		598.26	771-21 Rural Zone > 1011-21.7 Assessment Matters (Landscapes) > 1012-21.7.1 ONF and ONL > 1013-21.7.1.1	Support	For the reasons outlined in RPL's primary submission.
77.	Federated	600.1	10-Entire Plan	Support	For the reasons outlined in RPL's primary submission.
78.	Farmers of New Zealand	600.38	48-\t "Heading 5,5" 5 Tangata Whenua > 49-5.1 Purpose	Oppose	For the reasons outlined in RPL's primary submission.
79.	Jackie Gillies	604.13	1059-26 Historic Heritage > 1074-26.5 Objectives and Policies > 1082-26.5.3 Objective 3 > 1084-26.5.3.2	Support	For the reasons outlined in RPL's primary submission.
80.	and Associates	604.14	7 – Part 7 – Maps > 7.43 – Map 40 – Areas of Cultural Significance	Support	For the reasons outlined in RPL's primary submission.
81.		607.5	54-2 Definitions	Support	For the reasons outlined in RPL's primary submission.
82.		97.09	57-3 Strategic Direction > 59-3.2 Goals, Objectives and Policies	Support	For the reasons outlined in RPL's primary submission.
83.		7.709	57-3 Strategic Direction > 59-3.2 Goals, Objectives and Policies	Support	For the reasons outlined in RPL's primary submission.
84.	Te Anau Developments	807.8	57-3 Strategic Direction > 59-3.2 Goals, Objectives and Policies	Support	For the reasons outlined in RPL's primary submission.
85.	imited	6.709	10-Entire Plan	Support	For the reasons outlined in RPL's primary submission.
.986		607.10	57-3 Strategic Direction > 59-3.2 Goals, Objectives and Policies, 60-3.2.1 Goal 1 > 61-3.2.1.1 Objective 1 > 64-3.2.1.1.3	Support	For the reasons outlined in RPL's primary submission.
87.		607.11	57-3 Strategic Direction > 59-3.2 Goals, Objectives and Policies, 60-3.2.1 Goal 1 > 69-3.2.1.3 Objective 3 > 70-3.2.1.3.1	Support	For the reasons outlined in RPL's primary submission.
88.	Darby Planning	8.80	57-3 Strategic Direction > 59-3.2 Goals,	Support	For the reasons outlined in RPL's primary submission.

	Limited		Objectives and Policies, 60-3.2.1 Goal 1 > 72-3.2.1.4 Objective 4	_	
.68		608.49	81-6 Landscape > 84-6.3 Objectives and Policies > 107-6.3.4 Objective 4	Partial support	For the reasons outlined in RPL's primary submission, support to the extent the relief seeks offsetting when effects cannot be avoided, remedied, or mitigated, oppose requirement for "no net loss".
90.		608.50	81-6 Landscape > 84-6.3 Objectives and Policies > 123-6.3.7 Objective 7	Partial support	For the reasons outlined in RPL's primary submission, support to the extent the relief seeks offsetting when effects cannot be avoided, remedied, or mitigated,
91.		615.5	54-2 Definitions > 56-2.2 Definitions	Support	oppose requirement for no net loss. For the reasons outlined in RPL's primary submission.
92.	-	615.6	57-3 Strategic Direction > 59-3.2 Goals	Support	For the reasons outlined in RPL's primary submission.
94.		615./ 615.8	Objectives and Policies	Support	For the reasons outlined in RPL's primary submission. For the reasons outlined in RPL's primary submission.
95.	Cardrona	615.9	10-Entire Plan	Support	For the reasons outlined in RPL's primary submission.
96.	Alpine Resort Limited	615.10	57-3 Strategic Direction > 59-3.2 Goals, Objectives and Policies > 60-3.2.1 Goal 1. > 61-3.2.1.1 Objective 1. > 64-3.2.1.1.3.	Support	Support the intent of the submission for the reasons stated in RPL's original submission
97.	:	615.11	57-3 Strategic Direction > 59-3.2 Goals Objectives and Policies > 60-3.2.1 Goal 1 > 70-3.2.1.3 Objective 3	Support	For the reasons outlined in RPL's primary submission.
98.		621.5	54-2 Definitions	Support	For the reasons outlined in RPL's primary submission.
.66		621.6	57-3 Stratagic Direction > 50-3 2 Coals	Support	For the reasons outlined in RPL's primary submission.
100		621.7	Objectives and Policies	Support	For the reasons outlined in RPL's primary submission.
101.		621.8		Support	For the reasons outlined in RPL's primary submission.
102.		621.9	10-Entire Plan	Support	For the reasons outlined in RPL's primary submission.
103.	Real Journeys Limited	621.10	57-3 Strategic Direction > 59-3.2 Goals, Objectives and Policies > 60-3.2.1 Goal 1. > 61-3.2.1.1 Objective 1. > 64-3.2.1.1.3.	Support	Support the intent of the submission for the reasons stated in RPL's original submission
104.		621.86	771-21 Rural Zone > 890-21.5 Rules - Standards	Support	Support the intent of the submission for the reasons provided in RPL's original submission
105.		621.87	771-21 Rural Zone > 890- 21.5 Rules - Standards > 968-21.5.41	Support	Support for provisions to enable pipelines and structures to prevent bank erosion.
106.	DowntownQT	630.8	464-12 Queenstown Town Centre > 466- 12.2 Objectives and Policies > 467-12.2.1 Objective 1.	Oppose	The submission is opposed for the reasons stated in RPL's original submission

107		677 1	54 2 Dofinitions	1000	
		011.1	34-7 Delinitions	noddne	For the reasons outlined in RPL's primary submission.
108		677.2	- 57-3 Strategic Direction > 59-3.2 Goals.	Support	For the reasons outlined in RPL's primary submission.
80		6//.3	Objectives and Policies	Support	For the reasons outlined in RPL's primary submission.
110.		677.4		Support	For the reasons outlined in RPL's primary submission.
111.		677.5	10-Entire Plan	Support	For the reasons outlined in RPL's primary submission.
112.	Amrta Land Ltd	9.778	81-6 Landscape > 84-6.3 Objectives and Policies > 126-6.3.8 Objective 8 > 127-	Support	For the reasons outlined in RPL's primary submission.
173.		677.8	9.3.9.1 81-6 Landscape > 84-6.3 Objectives and Policies > 126-6.3.8 Objective 8 > 128- 6.3.8.2	Support	For the reasons outlined in RPL's primary submission.
114.	Lake Wakatipu Stations Ltd	702.2	57-3 Strategic Direction > 59-3.2 Goals, Objectives and Policies > 109-3.2.5 Goal 5	Support	For the reasons outlined in RPL's primary submission.
115.		716.3	54-2 Definitions	Support	For the reasons outlined in RPL's primary submission.
116.		716.4	57.3 Stratonic Direction > 50.3.2 Cools	Support	For the reasons outlined in RPL's primary submission.
117.		716.5	Objectives and Policies	Support	For the reasons outlined in RPL's primary submission.
118.		716.6		Support	For the reasons outlined in RPL's primary submission.
119.	Ngai Tahu	716.7		Support	For the reasons outlined in RPL's primary submission.
120.	Tourism Ltd	716.8	81-6 Landscape > 84-6.3 Objectives and Policies > 126-6.3.8 Objective 8 > 127-6.3.8.1	Support	For the reasons outlined in RPL's primary submission.
121.		716.9	81-6 Landscape > 84-6.3 Objectives and Policies > 126-6.3.8 Objective 8 > 128-6.3.8.2	Support	For the reasons outlined in RPL's primary submission.
122.	Hansen Family	7517	11-4 Urban Development > 13-4.2 Objectives and Policies > 28.4.2.3	Support	Support amendments to provisions within the air noise boundary.
123.	Partnership	2	Objective 3 > 36-4.2.3.8	Oppose	Oppose submission to the extent it is contrary to PC35
-	:		1182-27 Subdivision and Development > 1253-27.5 Rules - Standards for		Given advances in technology, and potential for self sufficiency providing telecommunications at time of
124.	Chorus New Zealand Limited	781.12	Subdivision Activities > 1266-27.5.4 Standards related to servicing and infrastructure	Oppose	subdivision should not be a requirement, allow for a range of telecommunications providers
125.		781.13	1182-27 Subdivision and Development > 1253-27.5 Rules - Standards for	Oppose	Given advances in technology, and potential for self sufficiency, providing telecommunications at time of

			Subdivision Activities		subdivision should not be a requirement, allow for a
					range of telecommunications providers
				Support	Support the integration of Plan Change 50 into the District Plan.
126.	C and L Holt	786	26-9 High Density Residential	and	Oppose the overall extent and location of the
				250440	Queenstown Town Centre when both Plan Change 50
					and the District Plan Review are considered.
127	•	836.7		Neutral	Amendments to the height definition and ground level
. [2]	Warwick	2.000	54-2 Definitions > 58-2 2 Definitions	INGRIIGI	definition should not apply to the RPZ
128	Goldsmith	836 10		Support	Support the intent of the submission for the reasons
3		2		adport	provided in RPL's original submission
					Recognise that if the location of the bridge crosses
120	Simon Hayas	845 1	8-General DD Beview Comments	Noutral	RPL land there are implications for development
	C C C	-		אַמַמוּמוּ	within the RPZ and therefore RPL should be a part of
					any discussions