

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

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

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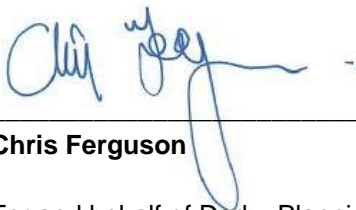
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Darby Planning LP (“**DPL**”) makes the submissions on Stage 2 of the Proposed Queenstown Lakes District Plan (“**PDP**”) set out in the **attached** document.

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

DPL would like to be heard in support of its submission.

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



Chris Ferguson

For and behalf of Darby Planning LP

23rd day of February 2018

OUTLINE OF SUBMISSION

This submission has been structured under the following headings:

Section A: Overview

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

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

SECTION A: OVERVIEW

1. DPL is based in Queenstown and Auckland and provides master planning and design services for large-scale project work throughout New Zealand, Asia and the Pacific. Locally in the Southern Lakes area in association with related entities, DPL leads the design and planning of a number of successful projects.
2. Those projects are in the following locations:
 - Jacks Point Resort
 - Wyuna Station
 - Soho Ski Area and Blackmans Creek
 - Treble Cone Ski Area
 - Parkins Bay Resort
 - Man Street Car Park
 - Mount Christina
 - Glenorchy
 - Morven Ferry Farm
 - Lake Hayes
 - Amisfield Vineyards, Winery and Restaurant
3. The diversity of these projects and related land interests include rural property development, ski area development and operations, farming, a commercial car park, commercial offices, viticulture and commercial wine production, restaurant operation, golf course development and operation.
4. DPL is continually assessing options to enable use, management and development of land and other resources while avoiding, remedying or mitigating any potential effects and minimising regulatory costs.
5. DPL has a proven track record and a strong ethic of land stewardship and management of resources sensitively through a master planning based approach that integrates use and management of land into the landscape in which they are located and the wider environment.
6. DPL lodged submissions and attended hearings on many of the strategic and district wide chapters notified through the Stage 1 PDP. This submission on the Stage 2 PDP generally seeks to ensure consistency with the approach sought within Stage 1, including the proposed changes to Chapter 6 Landscapes introduced through the new Chapter 38 Open Space and Recreation, the proposed variations to create a new Wakatipu Basin Chapter 24 and to address short stay visitor accommodation, and the new chapters relating to Earthworks (Chapter 25), Transport (Chapter 29) and Signs (Chapter 31).
7. The reasons for this submission is outlined in Section B with the specific relief being contained within Section C.

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

Timing, Scope and Extent of the Wakatipu Basin Rural Amenity Zone

8. DPL wishes to raise general concerns with the Council regarding the process of the District Plan Review and the proposed Variation which has caused unnecessary costs and delays for many.
9. For those submitters in the Wakatipu Basin who submitted on Stage 1 of the DPR in 2015, it is untenable that more than two years later not only have submissions still not been heard, but that those submitters are now required to resubmit on a materially different proposal before having the opportunity to be heard and influence a quality planning outcome.
10. Not only is the timing aspect of the process opposed, the manner in which the Variation was developed at haste, with minimal or no meaningful landowner consultation, is also opposed.
11. The WBRAZ is defined by those parts of the Wakatipu Basin not containing any outstanding natural landscape or features. The extent of the outstanding natural landscapes and features are however matters addressed within mapping hearings on stage 1 of the PDP. Decisions on the hearings for the relevant Stage 1 PDP mapping hearings have not yet been issued, and therefore boundaries of the ONFLs could change, affecting the integrity and integration of the WBRAZ with adjacent, nearby or maybe overlapping ONFLs.
12. The Wakatipu Basin Land Use Study (WBLUS) formed the basis for the WBRAZ Variation. The Variation is opposed because the WBLUS methodology lacked specificity and objectivity and any thorough landscape analysis. It is not apparent that any comprehensive resource mapping or visibility mapping was undertaken to support conclusions as to which areas were capable of absorbing development. The methodology applied, to the extent it was articulated, is not able to be repeated by independent experts and applied consistently to achieve the same outcome.
13. DPL is therefore opposed to the method by which boundaries for and within the zone have been established and the assessment methodology for establishing the Landscape Character Units, and associated descriptions and conclusion on ability to absorb change. DPL submit that it is flawed to assume that the boundary of the outstanding natural landscapes or features would not change and thereby restricted the assessment to an area that is not settled.
14. Through this submission, DPL seeks the following general relief:
 - a) Based on the general concerns raised above, to delete the WBRAZ and to undertake a proper and methodical landscape study to ensure that discretion is not limited to the currently unsettled landscape lines and that any subsequent assessment apply a more rigorous, repeatable methodology to characterise landscape units and determine ability to absorb change; and
 - b) Withdraw the provision of Chapter 24 and the associated changes to other chapters sought through the Stage 2 PDP and reinstate the Stage 1 PDP provisions; or
 - c) In the alternative and should the variation be accepted, DPL seeks:
 - i. Amend the provisions of Chapter 3 Strategic Directions and Chapter 6 Landscapes to provide appropriate objective and policy support for the Zone, to:
 - Recognise that the Wakatipu Basin has landscape qualities distinct from the Rural Landscape Classification;
 - Identify the characteristics and amenity values of the Wakatipu Basin through a proper and comprehensive mapping of the landscape character areas within it;

- Provide for areas of rural living within the Wakatipu Basin through identification of the lifestyle precinct;
 - Recognise and provide for areas of commercial activities within the basin and provide for them through a new commercial precinct ("Lakes Hayes Cellar Precinct");
 - Recognising the opportunities for low density housing within the rural setting;
 - Provide an appropriate policy structure in support of the proposed areas of landscape character and guidelines underpinning Chapter 24; and
 - Ensure that the landscape categories within Chapter 6 do not apply within the Lifestyle and Commercial Precincts.
- ii. Amend the provisions of Chapter 24 Wakatipu Basin Rural Amenity Zone in the manner described below.
- A more balanced range of objectives and policies appropriate to a high value (but not outstanding natural) landscape;
 - Enabling the construction of any building within with the Precinct as a permitted activity, including within an established residential building, subject to compliance with standards as proposed through the Stage 1 Rural Lifestyle Zone rules;
 - Removal of the rules relating to clearance, works or trimming of exotic vegetation above 4m in height;
 - Modify the rules relating to maximum building coverage, building height and setbacks from roads; and
 - Establish a minimum and average density requirement reflecting the subdivision rules
- iii. Amend the provisions of Chapter 25 Earthworks that are design to:
- A more balanced policy structure that provides for earthworks while minimising the adverse effects of such works on the environment; and
 - A range of minor edits to Advice Notes and Rules to improve administration and clarity of language.
- iv. Amend the provisions of Chapter 27 Subdivision to provide for subdivision within the Wakatipu Basin Lifestyle Precinct as a controlled activity.
- v. Amend the provisions relating to Visitor Accommodation to recognise and provide for short term guest stays within residential units or residential flats within areas of the Jacks Point Zone that anticipated and provide for visitor Accommodation, the Rural, Rural Lifestyle, Rural Residential and Wakatipu Basin Rural Amenity Zones.
15. The specific changes sought to the PDP provisions are detailed within Section C of this submission.

Integration with Strategic Directions and Landscape Chapters

16. The Wakatipu Basin Rural Amenity Zone is a new zone that has been created because of its distinctive characteristics. It has been designed to manage the land identified within the Rural

Landscape Classification, but differs in significant ways on how it proposes to manage this resource from the remainder of the district. Those differences are underpinned by a detailed study that identifies areas of landscape character, land use capability and formulates a suite of landscape guidelines into the new zone. Despite this, the scope of the Stage 2 PDP changes includes no higher order objective or policy support.

17. DPL considers that the district wide strategic directions and landscape chapters chapter need to be modified to provide appropriate policy support for the Zone and avoid unnecessary tensions within the existing policies, including to recognise that the basin has landscape qualities distinct from the rural landscape classification; that the character and amenity values of the Wakatipu Basin are mapped and landscape guidelines are formulated; that areas of rural living are provided through the lifestyle precinct; and that subdivision, use or development within the basin responds to the identified characteristics and values.

Application of the Landscape Categories

18. Other changes made to Chapter 6 through Chapter 38 Open Space and Recreation, seek to broaden the application of the landscape provisions to apply across all zones within the PDP, inclusive of all rural and urban zones and to also apply the landscape assessment matters (Chapter 21) to the rural lifestyle and rural residential zones. DPL opposes these changes and considers the rules within Chapter 6 should be amended to clarify that with respect to assessing the effects of subdivision or development the objectives and policies relating to the three classifications of landscapes within this chapter should not apply to the Precinct.
19. Under Chapter 6 (as notified), the landscapes of the district have been categorised into three classifications within the rural zone¹, being the outstanding natural landscapes, outstanding natural features and the rural landscape classification. This is reflected within Policy 6.3.1.2 which establishes the policy basis for the landscape classification within the rural zone. The variation to Chapter 6 introduced at the rear of the new Chapter 38 Open Space and recreation does not alter this policy.
20. The provisions of Chapter 22 include a specific objective and policies relating to landscape values and thereby establish the basis for the management of those values independent of the three-way landscape classification established by Policy 6.3.1.2. The proposed change to the wording of Rule 6.4.1.3 to include assessment matters and for those to apply to the rural lifestyle and rural residential zones is misguided because Chapter 6 does not contain any assessment matters and nor does Chapter 22 (relevant to landscape matters). The effect of this change would therefore be to require subdivision and development to be assessed against the assessment matters for the three landscapes under Chapter 21. DPL submit that neither the landscape categories or assessment matters contained within Chapter 21 are designed to relate to land outside of the Rural Zone.
21. DPL submits that the outcomes from subdivision or development undertaken in accordance with either rules outside of the rural zones would create considerable tensions with the objectives and policies for Rural Landscapes. In particular, Policy 6.3.1.4 provides that subdivision or development location within the Rural Landscape is inappropriate in many locations in these landscapes.
22. DPL submits that these policies and the objectives and policies applying to the three landscape classifications fundamentally conflict with the purpose of any rural lifestyle zone or precinct to provide residential living opportunities.

¹ 6.2, Page 6 – 2, Chapter 6, PDP - Values

23. DPL submits that the Council has failed to consider the implications of the proposed changes to Chapter 6, including any s32 analysis of the impact of this changes on urban land beyond the proposed Open Space and Recreation Zones.
24. Where the rule (as originally notified as part of Stage 1) includes the term “landscape categories”, DPL considers that the plan is not referring to Part 2 of the Act but rather the objectives, policies and assessment matters that apply to the three landscape classifications under the PDP. Accordingly, DPL submits that the wording of this rule could be improved to reflect that it is the classification of landscapes of the District and related objectives and policies for each classification within Chapter 6, which apply to the Rural Zone
25. In order to remain consistent with the policies, DPL submits that the Rule should also be amended to clarify that the Rural Zone is just that and does not include the rural lifestyle zone and the rural residential zones (Chapter 22) or the recently notified Wakatipu Basin Rural Amenity Zone (Chapter 24).

Chapter 25 Earthworks

26. DPL supports integration of the earthworks provisions into a new standalone chapter, subject to proper integration with Chapter 24 Wakatipu Basin. DPL seeks a number of changes to the Earthworks Chapter to achieve the following outcomes:
- (a) A more balanced policy structure that provides for earthworks while minimising the adverse effects of such works on the environment;
 - (b) A range of minor edits to Advice Notes and Rules to improve administration and clarity of language; and
 - (c) Amendments to the new standards that introduce further controls over earthworks within new zones or that amend existing zones, as follows:
 - i. For the Jacks Point Zone to amend the volume triggers to integrate with the changes advanced by Jacks Point at the Stage 1 PDP hearing on Chapter 41;
 - ii. For the Wakatipu Basin Zone that did not otherwise apply under the operative Rural Lifestyle Zone or are considered unnecessary;
 - iii. For the Ski Area Sub-Zones, to amend a general rule with the effect of exempting earthworks associated with ski area activities located within these areas; and
 - iv. For the proposed Glendhu Station to introduce changes to the maximum volume table to provide for this zone to ensure appropriate volume triggers are provided

Chapter 27 Subdivision

27. DPL oppose restricted activity status for subdivision within the Precinct Wakatipu Basin Lifestyle Precinct and having the same status as subdivision within the Wakatipu Basin Rural Amenity Zone. This status is at odds with the detailed process of mapping and recognition of this areas as having greater capacity to absorb change. DPL seeks to amend the subdivision rules to provide for subdivision within the Precinct as a controlled activity.

Chapter 29 Transport

28. DPL generally supports the objectives for the Transport Chapter 29, but seeks a number of amendments, as follows:
- a) Amending Policy 29.2.2.3 seeking to enable a lower rate of parking for residential activities to include the Jacks Point Zone Village Activity Area;

- b) Amending Policy 29.2.3.1 relating to the Council's Land Development and Subdivision Code of Practice to remove the wording of this to "require, as a minimum" the road design standards to be met;
- c) To review and amend the General Rules 29.33 relating to the relevant zoning of roads once they are stopped to be consistent with Chapter 37 Designations and to also cross reference the designation provisions within Chapter 37 with respect to this alternate management regime in place for QLDC roads; and
- d) The deletion of Rule 29.4.10 High Traffic Generating Activities.

Visitor Accommodation

29. DPL supports in part the addition of proposed restrictions on short stay visitor accommodation within residential units and residential flats within urban areas such as Jacks Point. DPL is however concerned with the impact of the proposed new rules and changes to the definitions of Visitor Accommodation on such accommodation within certain parts of the Jacks Point Zone that anticipate and provide for visitor accommodation as well as within the Rural, Rural Lifestyle, Rural Residential, proposed Glendhu Bay Zone and Wakatipu Basin Rural Amenity Zones.
30. DPL submits that the effects of short term stays within the rural and rural living areas do not justify the proposed restrictions for the following reasons:
- a) These zones contribute comparatively little to the housing stock across the District and enabling this form of accommodation has much less impact on the availability houses to provide for residential accommodation;
 - b) Housing within rural area is less affordable than housing within the urban areas and any reduction to residential capacity within these areas through short term accommodation would have little impact on the affordability of housing within the District;
 - c) Based on the analysis provided in support of the changes to the PDP by Infometrics², the majority of short term accommodation is occurring within urban areas of the District³;
 - d) The addition of the rules over short term guest accommodation within residential units or residential flats is not effects based;
 - e) Short stay visitor stays within residential units and residential flats provides for the economic wellbeing of people and communities without adversely affecting the environmental qualities of the rural residential or rural living environment; and
31. A blanket restriction by the Council to exclude short term guest stays within residential units or residential flats across all zones providing for residential accommodation is overly restrictive. The rural and rural living areas would provide one example of areas where enabling short term guest stays on residential accommodation would be both appropriate and have no adverse effects. DPL submits that if there are any wider effects of short term visitor stays (beyond the availability of houses for residential activity), the rural and rural living zones are ideally suited to internalise such effects due to the generous nature of open space, distances between neighbours and the ability to provide for car parking and services.
32. In relation to the JPZ, the relief sought in the submission by DPL is to also change the new standards relating to Residential Visitor Accommodation and Homestays to ensure they only

² Infometrics, "Measuring the scale and scope of Airbnb in Queenstown-Lakes District" (November 2017)

³ Section 6, *ibid*

apply within the Jacks Point residential areas and not the Village, Lodge and Homesite activity areas.

33. In relation to the Rural and WBRAZ, the relief sought is to delete the changes to Chapter 21 Rural Zone introduced through the stage 2 proposals notified by the Council.

Consequential Relief

34. DPL seeks to make any similar, alternative and/or consequential relief that may be necessary or appropriate to address the matters raised in this submission or the specific relief requested in this submission.
35. The submitter opposes the Variations and Stage 2 chapters in their entirety if the deficiencies identified in this submission are not addressed, and seeks that the Stage 2 Variations and Chapters be declined in the event the deficiencies are not addressed.

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

Specific Provision	Submission	Decisions Sought [New text shown <u><i></i></u> and deleted text shown as <i>strike-through</i>]
Chapter 6 Landscapes		
6.2 Values	<p>Oppose</p> <p>DPL opposes removal of the description of the values contained within 6.2, to the extent that it creates the potential for the landscape policies to apply to development located outside of the rural zone.</p>	Retain 6.2 Values, as detailed within Stage 1 of the PDP.
Rule 6.4.1.2	<p>Oppose</p> <p>DPL opposes the modification to this rule that has the effect of broadening the application of the Chapter 6 landscape categories to urban land.</p> <p>The landscapes of the district have been categorised into three classifications <u>within the rural zone</u>⁴, being the outstanding natural landscapes, outstanding natural features and the rural landscape classification. This is reflected within Policy 6.3.1.2 which establishes the policy basis for the landscape classification within the rural zone. The changes introduced through the Variation at the back of proposed Chapter 38 does not change this policy. The clarification under Rule 6.4.1.2 stating that the landscape categories apply only to the rural zone and that the landscape chapter and strategic directions chapters objectives and policies is a correct reflection of the structure of</p>	<p>Amend Rule 6.4.1.2, as follows:</p> <p style="text-align: center;"><i><u>The classification of landscapes of the District and related objectives policies for each classification within Chapter 6 landscape categories apply only to the Rural Zone. The Landscape Chapter and Strategic Direction Chapter’s objectives and policies are relevant and applicable in all zones where landscape values are at issue.</u></i></p>

⁴ 6.2, Page 6 – 2, Chapter 6, PDP - Values

Specific Provision	Submission	Decisions Sought [New text shown <u><i>underlined bold italics</i></u> and deleted text shown as <i>italic strike-through</i>]
	<p>the unmodified policies and the proposed changes by the council conflict with this policy direction.</p> <p>Where the rule includes the term “landscape categories”, DPL considers that the plan is not referring to Part 2 of the Act but rather the objectives, policies and assessment matters that apply to the three landscape classifications under the PDP.</p> <p>Accordingly, DPL seeks that the wording of this rule could be amended to reflect that it is the classification of landscapes of the District and related objectives and policies for each classification within Chapter 6, which apply to the Rural Zone.</p>	
<p>Rule 6.4.1.3</p>	<p>Oppose</p> <p>The effect of the proposed change to Rule 6.4.1.3 it to focus the application of the rule to “assessment matters”. This is confusing because Chapter 6 does not contain any assessment matters and the only other relevant assessment would be those included within Chapter 21 Rural Zone. Chapter 22 does not have any assessment matters relevant to subdivision and development (except with respect to hazards in the Makarora Lifestyle Zone). In addition, because this rule is worded in the negative i.e. the assessment matters do not apply to the certain areas, it could be interpreted that the assessment matters do apply to all other zones, outside of those listed exemptions.</p> <p>On this basis, the effect of the proposed changes to Rule 6.4.1.3 would be to apply assessment matters for the three landscape classifications within Chapter 21 Rural Zone to subdivision or development across all other zones. As detailed in the submission made above on Rule 6.4.1.2 the policies of chapter 6 apply the landscape classifications and related provision to the Rural Zone. The Council hasn’t sought to amend these policies</p>	<p>Amend Rule 6.4.1.3, as follows:</p> <p><u>The landscape categories classification of landscapes of the District, the related objectives policies for each classification within Chapter 6 and the landscape assessment matters within provision 21.7 (Chapter 21), do not apply to the following within the Rural Zones:</u></p> <ol style="list-style-type: none"> a. Ski Area Activities within the Ski Area Sub Zones. b. The area of the Frankton Arm located to the east of the Outstanding Natural Landscape line as shown on the District Plan maps. c. The Gibbston Character Zone. <p><u>For the avoidance of doubt, the Rural Zone does not include the Wakatipu Basin Rural Amenity Zone (or Precincts) (Chapter 24), the Rural Lifestyle Zone or the Rural Residential Zone (Chapter 22).</u></p>

Specific Provision	Submission	Decisions Sought [New text shown <u><i>underlined bold italics</i></u> and deleted text shown as <i>italic strike-through</i>]
	<p>and the changes to this Rule would not change how the policies relating to the three landscape classifications would apply.</p> <p>Where the rule (as originally notified as part of Stage 1) includes the term “landscape categories”, DPL considers that the plan is not referring to Part 2 of the Act but rather the objectives, policies and assessment matters that apply to the three landscape classifications under the PDP. Accordingly, DPL seeks that the wording of this rule be improved to reflect that it is the classification of landscapes of the District and related objectives and policies for each classification within Chapter 6, which apply to the Rural Zone</p> <p>In order to remain consistent with the policies, DPL submits that the Rule should also be amended to clarify that the Rural Zone is just that and does not include the rural lifestyle zone and the rural residential zones (Chapter 22) or the recently notified Wakatipu Basin Rural Amenity Zone (Chapter 24).</p>	
Chapter 24 Wakatipu Basin		
Objective 24.2.1	<p>Oppose</p> <p>DPL oppose the inclusion of “protection” within the objectives. As the Zone does not include land located within the outstanding natural landscapes or features it is not subject to s6(b) of the Act.</p>	<p>Amend Objective 24.2.4.1, as follows:</p> <p><i>Landscape and visual amenity values are protected, maintained and enhanced.</i></p>
Policy 24.2.1.1	<p>Oppose</p> <p>DPL supports the policy support for establishing a minimum and average lot size, but submit this is not necessary to “protect” landscape character as the Zone is not subject to s6(b) of the Act.</p>	<p>Amend Policy 24.2.1.1, as follows:</p> <p><i>Implement minimum and average lot sizes within the Wakatipu Basin Rural Amenity Zone and the Wakatipu Basin Lifestyle Precinct to protect <u>maintain</u> landscape character and visual amenity values.</i></p>

Specific Provision	Submission	Decisions Sought [New text shown <u><i>underlined bold italics</i></u> and deleted text shown as <i>italic strike-through</i>]
Policy 24.2.1.8	<p>Oppose</p> <p>DPL oppose the inclusion of “protect” within this policy as the landscape is not subject to s6(b) of the Act and does not need to further establish policy direction for the wider Wakatipu Basin beyond the Zone.</p>	<p>Amend Policy 24.2.1.8, as follows:</p> <p><i>Ensure land use activities protect, maintain and enhance the range of landscape character and visual amenity values associated with the Zone, <u>and</u> Precinct and wider Wakatipu Basin area.</i></p>
Policy 24.2.1.9	<p>Oppose</p> <p>DPL opposes the wording of this policy as openness and spaciousness are words capable of wide interpretation and characteristics associated with outstanding natural landscape or features.</p>	<p>Delete Policy 24.2.1.9</p>
New Policy 24.2.1.13	<p>DPL submits that the policies for the Zone need to recognise the established development rights created through residential buildings platforms and enable building. This policy supports further changes sought to the rules to provide for building within established building platforms as a permitted activity and to retain the rights created under the operative District Plan. DPL submits that there is no resource management justification for the removal of these established development rights.</p>	<p>Add a new Policy 24.2.1.13, as follows:</p> <p><u><i>Recognise established residential building platforms and enable building subject to achieving appropriate standards.</i></u></p>
Policy 24.2.5.1	<p>Oppose</p> <p>DPL oppose the uncertainty created through the wording of this policy, which subjects’ subdivision, use and development to achieving the values described within the landscape character units defined in Schedule 24.8. DPL submits that the landscape character units are important for establishing the extent of the Precinct and for managing subdivision, use and development within the more sensitive areas of the Zone, outside of the Precinct. Accordingly, DPL seeks amendments to reflect the</p>	<p>Amend Policy 24.2.5.1, as follows:</p> <p><i>Provide for rural residential subdivision, use and development <u>within the Wakatipu Basin Lifestyle Precinct</u> only where it protects, maintains or enhances the landscape character and visual amenity values as described within the landscape character unit as defined in Schedule 24.8.</i></p>

Specific Provision	Submission	Decisions Sought [New text shown <u><i>underlined bold italics</i></u> and deleted text shown as <i>italic strike-through</i>]
	<p>DPL submits that building should be a permitted activity within the Precinct and outside of the Precinct where it is located within an established building platform.</p> <p>DPL submits that the rules should also provide for the establishment of building platform with the Zone (outside of the Precinct), both as part of the subdivision and land use provisions, as this has proven to be an effective means of managing the potential impact of buildings in more sensitive parts of the landscape.</p> <p>Once a building platform has been created and associated conditions established through covenant or consent notice, LHL submit there is no further need to require resource consent as any failure to comply with the conditions of the prior approval would require resource consent through s221 or s127 as a discretionary activity. DPL submit that the Council has failed to adequately assess the effectiveness and efficiency of the proposed rules in terms of implementing the higher order objectives of the PDP and of the significant social and economic consequences of removing the rights secured through historic resource consents. DPL supports the approach taken under the notified stage 1 rural residential and rural lifestyle zone zones and seeks to have a similar regime established within the Precinct.</p>	<ul style="list-style-type: none"> • <u><i>Building location scale and form.</i></u> • <u><i>External appearance including materials and colours.</i></u> • <u><i>Access ways.</i></u> • <u><i>Servicing and site works including earthworks.</i></u> • <u><i>Retaining structures.</i></u> • <u><i>Infrastructure (e.g. water tanks).</i></u> • <u><i>Fencing and gates.</i></u> • <u><i>External lighting.</i></u> • <u><i>Landform modification, landscaping and planting (existing and proposed).</i></u> • <u><i>Natural hazards</i></u> <p>Excludes farm buildings as provided for in Rule 24.4.8</p>
Rule 24.4.29	<p>Oppose</p> <p>DPL oppose the introduction of this new rule for the Zone requiring resource consent as a restricted discretionary activity for clearance, works within the root protection zone or significant trimming of exotic vegetation greater than 4m in height. The rule is considered inefficient, difficult to administer and would act</p>	Delete Rule 24.4.29

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	against the higher order objectives of the plan to avoid the spread of wilding trees and to also enhance natural ecosystems. DPL seeks to have this rule deleted.	
Rule 24.5.1	<p>Support in Part</p> <p>DPL generally support the introduction of a building coverage standard as it is similar to the approach proposed within Chapter 22 (PDP Stage 1). As notified the rule is considered overly restrictive and should be amended to relate to the ground floor area of any individual building and not the cumulative gross floor area.</p> <p>DPL seeks to amend building coverage within the Lake Hayes Cellar Precinct it seeks to enable up to 25% to reflect the amenity values anticipated. On this site, a slightly higher coverage is appropriate given the framework of the requirement for resource consent for any new building associated with a commercial activity and the emphasis on the achieving a high quality of building design</p>	<p>Amend Rule 24.5.1 Building Coverage, as follows:</p> <p><i>The maximum building coverage for all <u>any individual buildings shall be 15% of lot area, or 500m² gross ground floor area whichever is the lesser, except within the Lake Hayes Cellar Precinct where the maximum ground floor area of any building shall be limited to 25% of the net site area.</u></i></p>
Rule 24.5.3	<p>Oppose</p> <p>DPL oppose the proposed height limitation of 6m on the basis that 6m is overly restrictive. DPL seeks to the rule to provide a maximum height of 8m, consistent with the operative District plan and PDP zones.</p>	<p>Amend Rule 24.5.3 Height of Buildings, as follows:</p> <p><i>The maximum height of any building shall be <u>8m</u></i></p>
Rule 24.5.4	<p>Oppose</p> <p>DPL oppose a 75m setback from road boundaries within the Lifestyle Precinct. The Lifestyle Precinct has been identified as having greater capacity for change, deriving in part from the nature of existing development undertaken in accordance with operative District Plan zone. Imposing a setback 65m greater</p>	<p>Amend Rule 24.5.4 Setback from Roads, as follows:</p> <p><i>The minimum setback of any building from road boundaries shall be <u>210m anywhere within the Zone and 75m in the Precinct.</u></i></p>

Specific Provision	Submission	Decisions Sought [New text shown <u><i>underlined bold italics</i></u> and deleted text shown as <i>italic strike-through</i>]
	than under the existing regime will establish a meaningless standard that cannot be defended against the established environment in many instances. Moreover, where having a standard of 20m for the Zone, outside of the Lifestyle Precinct, will exacerbate problems in the context of areas with supposedly high landscape qualities. Accordingly, DPL seeks to remove the 75m building setback within the Precinct and rely on a 10m setback across all of the Zone.	
New Rule 24.5.17 Density	DPL support establishment of a minimum and average lot size for subdivision within the Lifestyle Precinct and submits that the Chapter 24 rules should provide for an equivalent mechanism for land use activity, complimenting the proposed permitted activity status for building. DPL seeks the addition of a new standard to enable a density of development having a minimum site area of 6,000m ² and an average of 1ha.	Add a new Standard (Table 24,3), Rule 24.5.17, as follows: a) There shall be no more than one residential unit per site b) For sites equal or greater than 1ha, there shall be no more than 1 residential unit per hectare, on average.
Rule 24.6 Non-notification of Applications	Support in Part DPL support in part this rule and seek to add controlled activities to the resources consents which shall not require written consent of other persons and shall not be notified or limited-notified.	Amend provision 24.6, as follows: <i>Any application for resource consent for <u>controlled or restricted discretionary activities</u> shall not require the written consent of other persons and shall not be notified or limited – notified, with the exception of the following ...</i>
Provision 24.7.2	Oppose DPL oppose the cross-references to the higher order strategic directions, urban development and landscape chapters to this zone without the specific amendments to these provisions as detailed in this submission. DPL submits that the existing chapters would create fundamental conflicts that would undermine the specific direction offered through the Wakatipu Basin Rural Amenity Zone.	Delete provisions 24.7.2

Specific Provision	Submission	Decisions Sought [New text shown <u><i>underlined bold italics</i></u> and deleted text shown as <i>italic strike-through</i>]
Chapter 25 Earthworks		
Policy 25.2.1.2	<p>Oppose</p> <p>DPL are opposed to the proposed wording of this policy seeking to “protect” the listed resources as it is overly restrictive and conflicts with the objective to minimise adverse effects.</p>	<p>Amend Policy 25.2.1.2, as follows:</p> <p><i>Protect</i> <u><i>Minimise the adverse effects of earthworks on the following valued resources including those that are identified in the District Plan from the inappropriate adverse effects of earthworks:</i></u></p> <p><i>a. Outstanding Natural Features and Landscapes;</i></p> <p><i>b. the amenity values of Rural Landscapes and other identified amenity landscapes;</i></p> <p><i>c. significant Natural Areas and the margins of lakes, rivers and wetlands;</i></p> <p><i>d. the exposure of aquifers, in particular the Wakatipu Basin, Hāwea Basin, Wanaka Basin and Cardrona alluvial ribbon aquifers;</i></p>
Policy 25.2.2.1	<p>Oppose</p> <p>DPL oppose prefacing this policy with “subject to Objective 25.2.5.1” as it has the effect of undermining the significance of social and economic wellbeing and the community benefits of earthworks and the appropriate balancing of provisions.</p>	<p>Amend Policy 25.2.2.1, as follows:</p> <p><i>Subject to Objective 25.2.1,</i> <u><i>Enable</i></u> earthworks that are necessary to provide for people and communities wellbeing, having particular regard to the importance of:</p> <p>...</p>
25.3.3 Advice Notes 25.3.1	<p>Support in Part</p> <p>DPL support in part the inclusion of this Advice Note to clarify how the volume of earthworks is calculated. It is suggested that as earthworks are a dynamic process during construction phase,</p>	<p>Amend Advice Note 25.3.3.1, as follows:</p> <p><i>Volume shall mean the sum of all earth that is moved within a site and includes the total of any combined cut and fill, <u>measured at the</u></i></p>

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	it would be assist in the understanding of the rule if volume was calculated at the completion of such work.	<u><i>completion of that work.</i></u> Refer to Interpretive Diagrams 25.1 to 25.3 located within Schedule 25.9.
Advice Note 25.3.3.3	<p>Support in Part</p> <p>DPL supports the meaning of this Advice Note and suggests a minor wording change to better express its meaning.</p>	<p>Amend Advice Note 25.3.3.3, as follows:</p> <p><i>Refer to Chapter 33 Indigenous Vegetation and Biodiversity for land disturbance activities within Significant Natural Areas. The <u>The provisions of this chapter do not prevail over those of Chapter 33 Indigenous Vegetation and Biodiversity.</u></i></p>
Advice Note 25.3.3.4	<p>Support in Part</p> <p>DPL supports the meaning of this Advice Note and suggests a minor wording change to better express its meaning.</p>	<p>Amend Advice Note 25.3.3.4, as follows:</p> <p><i>Earthworks are also managed as part of development activities and modifications to Historic Heritage items and settings identified on the Planning Maps and in Chapter 26 Historic Heritage. The <u>The provisions of this chapter do not prevail over those of Chapter 26 Historic Heritage.</u></i></p>
Advice Note 25.3.3.11	<p>Support in Part</p> <p>DPL supports the meaning of this Advice Note and suggests a minor wording change to better express its meaning.</p>	<p>Amend Advice Note 25.3.3.11, as follows:</p> <p><i><u>The provision of this chapter do not apply to are the following activities managed in Chapter 30 Energy and Utilities:</u></i></p> <p>...</p>
25.3.4 General Rule 25.3.4.1	<p>Support in Part</p> <p>DPL supports this rule in part, but considers that it should be broadened to apply to all subdivision, not just subdivision that is a controlled or restricted discretionary activity. Changes to the structure of the rule are also proposed as earthworks are not “subject to” subdivision consent, being the very point of the rule.</p>	<p>Amend Rule 25.3.4.1, as follows:</p> <p><i>Earthworks <u>associated with subject to resource consent applications for Controlled or Restricted Discretionary activity</u> subdivisions pursuant to section 11 of the Act and the provisions of Chapter 27, <u>shall be:</u></i></p> <p><i>i) exempt from the following Rules:</i></p>

Specific Provision	Submission	Decisions Sought [New text shown <u><i>underlined bold italics</i></u> and deleted text shown as <i>italic strike-through</i>]
	It is suggested instead that “earthworks associated with subdivision” be exempt.	<p><i>a. Table 25.2 volume;</i></p> <p><i>b. Rule 25.5.16 cut; and</i></p> <p><i>c. Rule 25.5.17 fill.</i></p> <p><i>ii) Applications for subdivision involving any earthworks shall be considered against the matters of discretion for earthworks in Part 25.7 and assessment matters in Part 25.8.</i></p> <p><i>All other rules in the Earthworks Chapter apply to applications for subdivision consent.</i></p>
25.3.4.2	<p>Support in Part</p> <p>DPL supports this rule in part, but considers that it should be broadened to apply to all of the standards within Chapter 25 Earthworks.</p>	<p>Amend Rule 25.3.42, as follows:</p> <p><i>Earthworks for Ski Area Activities within the Ski Area Sub Zones and vehicle testing facilities within the Wairau Ski Area Sub Zone are exempt from the earthworks rules, with the exception of the following rules that apply:</i></p> <p><i>a. Rules 25.5.12 to 25.5.14 that control erosion and sediment, deposition of material on Roads and dust;</i></p> <p><i>b. Rule 25.5.20 setbacks from waterbodies; and</i></p> <p><i>c. Rule 21.5.21 exposing groundwater.</i></p>
General Rule 25.3.4.3	<p>Support in Part</p> <p>DPL support the intent of this rule and proposed a change to align with the outcome of the hearing on Chapter 41 Jacks Point Zone, where it was proposed after questions from the Panel to enable volume and areas of earthworks to be calculated across “any” consecutive 12 month period, rather than only “one” 12 month period.</p>	<p>Amend Rule 25.3.4.3, as follows:</p> <p><i>The maximum volume and area of earthworks shall be calculated per <u>sSite</u>, within one <u>any</u> consecutive 12 month period</i></p>

Specific Provision	Submission	Decisions Sought [New text shown <u><i></i></u> and deleted text shown as <i></i>]								
<p>Table 25.2 Maximum Volumes</p> <p>Rule 25.8</p> <p>Rule 25.5.9</p> <p>Rule 25.5.10</p>	<p>Support in Part</p> <p>DPL seek changes to ensure the volume triggers provided for in Rules 25.5.8, 25.5.9 and 25.5.10 are consistent with and integrate with the positions advanced by Jacks Point at the stage 1 hearing for Chapter 41.</p> <p>DPL seek changes to the maximum volume table to provide for the Glendhu Station Zone, to ensure appropriate volume triggers are provided for in the standards, consistent with and integrate with the positions advanced within the Glendhu Station Zone advanced at the stage 1 hearing.</p>	<p>(a) Amend Rule 25.5.8 to remove the Village</p> <p>(b) Amend Rule 25.5.9 to remove Farm Preserve 1 and 2 and amend Homesite to refer to “Preserve Homesite”</p> <p>(c) Amend Rule 25.5.10 to remove “Education” and “Education Innovation Campus” and add in the “Village”</p> <p>(d) Any further consequential changes to the maximum volume triggers to integrate final activity areas arising from decisions on the Stage 1 hearing for the Jacks Point Zone (Chapter 41).</p> <p>(e) Amend Rule 25.5.2 to introduce appropriate maximum volume thresholds for the Glendhu Station Zone, based on the table below</p> <table border="1" style="margin-left: 40px;"> <thead> <tr> <th>Activity Area</th> <th>Maximum Total Volume per site</th> </tr> </thead> <tbody> <tr> <td>Activity Area R Activity Area GS(FH) Activity Area GS(C)</td> <td>500 m³</td> </tr> <tr> <td>Activity Area GS(OS/F)</td> <td>1,000 m³</td> </tr> <tr> <td>Activity Area G Activity Area LS</td> <td>No maximum</td> </tr> </tbody> </table> <p>(f) Make any further consequential changes to the maximum volume triggers to integrate final activity areas arising from decisions on the Stage 1 hearing for the Glendhu Station Zone.</p>	Activity Area	Maximum Total Volume per site	Activity Area R Activity Area GS(FH) Activity Area GS(C)	500 m ³	Activity Area GS(OS/F)	1,000 m ³	Activity Area G Activity Area LS	No maximum
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<p>Rule 25.5.11</p>	<p>Oppose</p> <p>DPL opposes the inclusion of the Wakatipu Basin Rural Amenity Zone (including Lifestyle and Lake Hayes Cellar Precincts,</p>	<p>Amend Rule 25.5.11 to add the following statement:</p>								

Specific Provision	Submission	Decisions Sought [New text shown <u><i></i></u> and deleted text shown as <i></i>]
	SASZs, Jacks Point Zone or the Glendhu Station Zone within the area thresholds and seek to exempt this zone from the rule to be consistent with the approach taken within Chapter 41.	<u><i>Except this rule shall not apply within the Wakatipu Basin Rural Amenity Zone (including Lifestyle and Lake Hayes Cellar Precincts), Glendhu Station Zone (Chapter 44), Jacks Point Zone (Chapter 41) or to Ski Area Activities located within the Ski Area Sub-Zones.</i></u>
Rule 25.5.12	Oppose DPL oppose non-complying activity status for a breach of this rule, which is considered able to be appropriately managed as a restricted discretionary activity. In addition, non-complying activity stratus does not follow from the wording of the relevant policies.	Amend Rule 25.5.12 to: a) Change the status of non-compliance to restricted discretionary; and b) Add an exemption stating that this rule shall not apply Ski Area Activities located within the Ski Area Sub-Zones.
Rule 25.5.13	Oppose DPL oppose non-complying activity status for a breach of this rule, which is considered able to be appropriately managed as a restricted discretionary activity. In addition, non-complying activity stratus does not follow from the wording of the relevant policies.	Amend Rule 25.5.13 to change the status of non-compliance to restricted discretionary
Rule 25.5.15	Support DPL supports the intent of this rule to establish a permissive approach for managing accidental discovery, archaeological sites and contaminated land through the relevant legislation applying to these matters and not as a separate rule trigger.	No changes
Rule 25.5.18	Support in Part DPL is unclear whether access ways are intended to capture roads, including roads created through subdivision and seeks changes to ensure roads to vest or private roads are exempt	Amend Rule 25.5.18, as follows: <u><i>Earthworks for farm tracks and access ways, but not roads vest or private road created by subdivision consent, in the following Zones and Activity Area shall comply with rules (a) to (c).</i></u>

Specific Provision	Submission	Decisions Sought [New text shown <u><i></i></u> and deleted text shown as <i></i>]
	from this rule. The reasons being that their effects are appropriately managed through the broader consideration of subdivision works and the other standards within this chapter.	
Rule 25.5.20	<p>Oppose</p> <p>DPL oppose the introduction of a new 10m setback for all earthworks from the bed of any water body. In relation to water bodies the operative earthworks rules provide for 20m³ of earthworks within 7m of a water body. The 7m setback is also consistent with rules within the Otago Regional Water Plan. No assessment has been made to justify this departure. DPL seek to change the rule to retain the ability to undertake 20m³ of earthworks within 7m of a waterbody.</p>	<p>Amend Rule 25.5.20, as follows:</p> <p>a) <i>Earthworks <u>greater than 20m³ in volume</u> shall be setback a minimum distance of 40 <u>7</u> metres from the bed of any water body.</i> ...; and</p> <p>b) To provide an exemption stating that this rule shall not apply to Ski Area Activities located within the Ski Area Sub-Zones</p>
Rule 25.4.21	<p>Oppose</p> <p>DPL oppose the application of this rule to ski area activities located within the SASZs.</p>	Amend Rule 25.5.21 to provide an exemption stating that this rule shall not apply to ski area activities located within the Ski Area Sub Zones.
Rule 25.5.22 Cleanfill	<p>Oppose</p> <p>It is unclear how this rule is intended to operate when all earthworks to operate a Cleanfill are listed as a discretionary activity through Rule 25.4.3</p>	Delete this rule or otherwise amend to relate to Rule 25.4.3.
Schedule 25.10 Accidental Discovery Protocol	<p>Support</p> <p>DPL supports the addition of an accidental Discovery Protocol into the PDP, in the event its wording has been agreed to by the relevant agencies and Mana Whenua.</p>	

Specific Provision	Submission	Decisions Sought [New text shown <u><i>underlined bold italics</i></u> and deleted text shown as <i>italic strike-through</i>]
Definition of Earthworks	<p>Oppose</p> <p>DPL oppose the addition of cleanfill into the definition of earthworks on the basis that Cleanfill is separately defined and supplemented by a separate discretionary activity rule regardless of volume.</p>	Amend the definition of Earthworks to remove the deposition and removal of Cleanfill.
Chapter 27 Subdivision		
Rule 27.3.2.1 Earthworks associated with subdivision	<p>Support in Part</p> <p>DPL generally supports the addition of a cross reference to the earthworks rule within Chapter 25 but consider that this should be expanded to be made clearer and to follow the approach taken with Rule 25.3.4.1.</p>	<p>Amend Rule 27.3.2.1 [Rule 27.4.2.1 Revised Proposal], as follows</p> <p style="text-align: center;"><i>Earthworks undertaken for the development of land associated with any subdivision <u>are subject to certain standards of the Earthworks Chapter, including</u> shall be considered against the matters of control or discretion from that chapter of the District Wide Earthworks Chapter as part of any subdivision activity and in particular Rule 15.2.20. Refer to Rule 25.3.4.1 (Chapter 25).</i></p>
Rule 27.5.1	<p>Support in Part</p> <p>DPL supports the establishment of a minimum lot area and <u>minimum</u> average lot area for subdivision within the Precinct. DPL seeks to amend the wording of the standard to ensure that the density of subdivision achieves a minimum lot area of 6,000m² and <u>minimum</u> average lot area of 1ha, <u>so that it is clear a subdivision may achieve an average of lot sizes that are larger than 1ha.</u></p>	Change heading of table 27.5.1 to " <i>No lots to be created by subdivision, including balance lots, shall have a net site area or where specified, average, less that the minimum <u>lot area or minimum average specified</u></i> "
Chapter 29 Transport		

Specific Provision	Submission	Decisions Sought [New text shown <u><i>underlined bold italics</i></u> and deleted text shown as <i>italic strike-through</i>]
Objective 29.2.1	<p>Support in Part</p> <p>DPL supports in part the objective insofar as it provides for an integrated, safe and efficient transport network that reduces the dominance of congestion of vehicles. DPL submits that the reduction of dominance and congestion of vehicles would not necessarily be confined to the Town Centre Zones and on this basis, seeks to amend the objective to remove this qualification.</p>	Amend Objective 29.2.1 to remove the words “in the Town Centre zones” from the end of the last bullet.
Policy 29.2.2.3	<p>Support in Part</p> <p>DPL supports the direction of this policy seeking to enable a lower rate of parking to be provided for residential flats, district wide, and for residential activities in the Town Centre, mixed Business Use, High Density Residential and Medium Density Residential Zone compared to other zones. DPL submits that the Village Activity Area is zoned to provide a comparable density and character to the urban environment listed within the policy and DPL seeks to amend the policy to include this area.</p>	<p>Amend Policy 29.2.2.3, as follows:</p> <p style="text-align: center;"><i>Enable a lower rate of accessory parking to be provided for residential flats district wide, and for residential activity in the Town Centre, Business Mixed Use, High Density Residential, and Medium Density Residential zones <u>and the Village Activity Area within the Jacks Point Zone</u> compared to other zones to support intensification and in recognition of the accessibility and anticipated density of these zones.</i></p>
Policy 29.2.2.5	<p>Support</p> <p>DPL supports having a policy framework enabling a reduction in the number of car parking spaces.</p>	Retain Policy 29.2.2.5
Policy 29.2.3.1	<p>Oppose</p> <p>DPL opposes the wording of this policy to “require, as a minimum” road designs in accordance with the Councils Land Development and Subdivision Code of Practice (2015). DPL submits that environment factors and urban design considerations may justify a lesser standard of road design than that prescribed in the Code. The Councils Land Development</p>	<p>Replace Policy 29.2.3.1 with the following:</p> <p style="text-align: center;"><i><u>Adopt the QLDC Land Development and Subdivision Code of practice (2015) as the basis for road design within the District.</u></i></p>

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	<p>and Subdivision Code is an adaptation of New Zealand Standard 4404:2010. Section 3 of this standard explicitly states that the tables within Section 3 are the basis for road design and that alternative carriageway widths may be adopted to suite particular design considerations, subject to specific consideration and approval by the TA. Adherence to the design standards “as a minimum” is therefore inconsistent with the wording of the Council Code and is not supported in the assessment framework anticipated within that document. DPL seeks to amend the wording of this policy to adopt the Land Development and Subdivision Code of Practice as the basis for road design.</p>	
Policy 29.2.4.1	<p>Support</p> <p>DPL supports this policy seeking to avoid commercial activities and home occupations in residential areas. DPL supports residential areas such as Jacks Point as having policy support to ensure roads congested through commercial activity.</p>	Retain Policy 29.2.4.1
29.3.3 General Rule Rule 29.3.3.2	<p>Support in Part</p> <p>DPL supports in part the PDP setting out a process for application of the relevant zoning to road once it has been stopped. There is however a similar but different process for this set out within Chapter 37 A. Road (Page37-30. DPL seeks to simply have one consistent process.</p>	Review and amend Rule 29.2.3.2 as it relates to the zoning of stopped road to be consistent with the process established within Chapter 37 A. Road.
29.3.3. General Rules	<p>The general rules do not recognise that all QLDC roads are designated and are subject to the provisions of s176 of the Act and Chapter 37.</p>	Add a new general rule cross referencing to Chapter 37, to identify that all QLDC roads are designated and subject to the provisions of s176 of the Act, which provide that s9(3) does not apply to a project or work by the requiring authority; and no person may, without the prior written consent of

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		the requiring authority, to anything in relation to that land that is subject to the road designation preventing or hindering a public project or work.
Rule 29.4.10 High Traffic Generating Activities	<p>Oppose</p> <p>DPL oppose the introduction of a blanket rule relating to high traffic generating activities, as that assessment should be incorporated into the rules relating to activities within the relevant zone, including throughout the specific matters of control or discretion. In addition, the wording of the rule includes subdivision, which DPL submits does not allow for an assessment of the actual traffic demands that would result from the eventual land uses. DPL also notes that the reference in the rule to table 29.6 appears incorrect.</p>	Delete Rule 29.4.10
Visitor Accommodation		
Definition of “Visitor Accommodation”	<p>Oppose in Part</p> <p>DPL supports in part the proposed restrictions on sort stay visitor accommodation within residential units and residential flats within urban areas such as Jacks Point. It is however concerned with the impacts of the new rules and changes to the definition of Visitor Accommodation on such accommodation within certain parts of the Jacks Point Zone that anticipate and provide for both residential and visitor accommodation.</p> <p>The Visitor Accommodation variation proposes to amend the definition of Visitor Accommodation to exclude residential units and residential flats from that definition and is coupled with the introduction of an additional definition of Residential Visitor Accommodation, which is designed to capture short term stays</p>	Reinstate the definition of Visitor Accommodations as to include any residential unit or residential flat.

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	<p>of guests not exceeding 90 within a residential unit or a residential flat.</p> <p>The standards proposed to be applied will mean that any Residential Unit used for short term visitor accommodation and falling within the definition Residential Visitor Accommodation will become a non-complying activity where it exceeds the specified standards for up to 3 lets not exceeding a total of 28 nights per year and the two vehicle trip trigger.</p> <p>DPL submit that the effects of short stay within the Rural Zone, Rural Lifestyle Zone, Rural Residential Zone and the Wakatipu Basin Rural Amenity Zone do not justify the restrictions for the reasons set out in Section B, above.</p> <p>On this basis, DPL seeks to delete the proposed additions to the definition of Visitor Accommodation excluding the use of a residential unit or residential flat.</p>	
<p>Rules 21.4.37, 22.4.18, 24.4.18 and 41.4.18 Residential Visitor Accommodation</p>	<p>Oppose</p> <p>DPL generally supports the addition of rules within the Jacks Point residential areas to regulate the effects of short term stays for paying visitors and guests. There are however areas within the Jacks Point Zone, such as the Village, Lodge and Homesite Activity Areas, where visitor accommodation is anticipated and provided for and where further regulation is unnecessary. Accordingly, Jacks Point seeks to amend this rule to exclude the Village, Lodge and homesite Activity Areas and the deletion of the Rules within the rural and rural living zones.</p>	<p>a) Amend Rule 41.4.18.1 to exclude the Village (V), Lodge (L) and Homesite (HS) Activity Areas.; and</p> <p>b) Delete Rule 21.4.37, 22.4.18, 24.4.18 and 41.4.18</p>
<p>Rules 21.5.53, 22.5.14, 24.5.15, 41.5.20 Standards for</p>	<p>Oppose</p>	<p>Delete Rules 21.5.53, 22.5.14, 24.5.15, 41.5.20</p>

Specific Provision	Submission	Decisions Sought [New text shown <u><i>underlined bold italics</i></u> and deleted text shown as <i>italic strike-through</i>]
Residential Visitor Accommodation	DPL opposes the addition of standards relating to the use of Residential units or Residential Flats for short term guest stays within the WBRAZ, Rural, Rural Residential and Rural Lifestyle Zones for the reasons expressed within Section B above. DPL seeks to delete this standard.	
Rule 21.5.54, 22.5.15, 24.5.16, 41.5.21 Standards for Homestays	Oppose DPL opposes the addition of standards relating to the use of Residential units or Residential Flats for short term guest stays within the WBRAZ, Rural, Rural Residential and Rural Lifestyle Zones for the reasons expressed within Section B above. GSL seeks to delete this standard	Delete Rule 21.5.54, 22.5.15, 24.5.16, 41.5.21