

RESOURCE MANAGEMENT ACT 1991
SUBMISSION on District Plan Review PUBLICLY NOTIFIED PLAN

Rural General

TO: QUEENSTOWN LAKES DISTRICT COUNCIL

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

NAME: Richard Burdon

Glen Dene Ltd & Glen Dene Holdings makes this submission on the District Plan Review

1. Summary

We have been waiting quite some time for this review and many of the planners we talked to about policy and rules have moved on, however I would like to thank the current planners involved with the plans as I believe they made a greater effort to be involved and part of the community prior to notification it is however around 15 years since our last plan was done, which to become operative took countless hours in and out of court for most people. As a farmer, tourism operator and land owner I am keen for a better process. To achieve this there are some key issues that need to be addressed.

- Cost of associated with doing business in QLDC is an important aspect to the farming and tourism business in the district.
- Key areas around woolshed & homesteads already modified should have a Rural Residential zone around them to allow for future growth, on a property the size of 3000 hectares then a zone similar to the Mackenzie Country that allows farmers to build workers dwelling, farm offices, farm building. Otherwise simple consents will end up becoming a compliance nightmare as many of the larger stations fall into the ONL Zone.
- Blanket zoning of our High Country farms ONL is unacceptable and they deserve to be treated as other areas in the region (Lake Wanaka) It should be consistent with it landscape Zone across the district. Lake Hawea Farm land adjoining the lake seems to have had a blanket ONL across the Properties while adjoining Lake Wanka land seems to have a great amount of more Rural Landscape zones.

- If Rural zone issues should be dealt with now rather than spread over next year or so, such as identifying the Lake Hawea Holiday Park as ONL and Glen Dene trying to rezone this Rural Visitor Zone from Rural General, it adds complexity to the plan.
- The uncertainty of the process and costs associated to consenting as well as the time taking to go through the process is a concern and why the farming community wish to see more permitted activities. So well done on recognising that this was a major issue with the last plan.
- The interference from the landscape industry. Eg doing a ten page report on a farm track, over emphasising details which are not necessarily warranted bring unnecessary cost into the process.
- The rural landscapes we live in are working landscapes, modified and yet keep being referred to as natural landscapes. Lake Hawea been raised by some 60 ft causing cliff faces to be exposed, dusty beaches and yet the ONL classification identifies is as a natural landscape when in fact it is highly modified as a result of planted trees, grazing, cultivation, irrigation and rural buildings.
- It is important to recognise the tourism, conservation & farming sectors as significant economic drivers in the area.
- The Upper Clutha has only two real drivers of economic activity, farming and tourism. The District Plan seems to concentrate almost exclusively on landscape considerations and ignores the need for communities to provide for their economic well being. Many farming businesses today also have a tourism aspect to their business which mean they have other requirements.
- I appreciate the planners in their considerations of the many farmers who are the custodians of our landscapes and how they have tried to reduce bureaucracy and regulation and allow more permitted activities to help prevent increasing that cost.
- Classification of “landscape zones” is yet another impediment to farmers running their business.

2. Submissions

I would like submit on a number of aspects of the Proposed District Plan. These submissions are from Glen Dene Holdings (the lessee of the Lake Hawea Holiday Park) and Glen Dene Ltd. (the owner of Glen Dene Station a high country farming property, involved in farming and tourism, and the owner of the land around the Lake Hawea Holiday Park).

Background

I reside at Glen Dene Station which I farm in conjunction with my wife Sarah and our family. I am the third generation farmer of Glen Dene which was originally Mount Burke before it was split in 1979. Traditionally we farmed merinos, deer and a few cattle. However, due to changing times in the high country and wool no longer being profitable and succession we have had to diversify and develop our business and over the years have tried a number of options. We currently farm cross bred sheep, deer, and cattle and run a hunting & fishing business and lease a block of land on

Hawea Flat. We purchased the Lake Hawea Holiday Park in 2009 which we have been running for the last 6 years.

Sarah has been involved in the tourism business since she left school and has a Bachelor of Technology (Ecotourism) degree from Flinders University in Australia. Both Sarah and I are passionate about the area and the land. We won the Balance Farm Environmental Award in 2009 which shows our passion and commitment to farming, recreation and conservation in the environment.

Glen Dene Hunting and Fishing has recently undertaken a Qualmark Quality Assurance evaluation and is delighted with the feedback we have received. Glen Dene is delighted to have been awarded an **Enviro Gold Award** – “Exceeds the highest levels of environmental and social responsibilities. Represents strong leadership and advocacy.” We are very pleased to have received these endorsements from Qualmark New Zealand. They confirm and recognise our belief that Glen Dene Ltd is one of New Zealand's quality tourism operators. We have always aimed to please and create great experiences.

Overview of Glen Dene and Lake Hawea Holiday Park Area

For the past 6 years we have been running the holiday park and hunting business, farming and bringing up a small family.

We bought the lease of the Holiday Park in 2009 from the Cotter family who started the park and ran the park for over 40 years. In addition Glen Dene Ltd owns the land surrounding the camp ground to the east and north of the Campground. Since then and running the park for the last 6 years we have noticed a number of things. In order for the park to be sustainable in the future the holiday park needs to be operational for 12 months of the year. At present the campground has limited accommodation options and limited facilities. Camping is really only suited to the summer months. Without any further development of the holiday park the only way to cover increasing costs is to increase prices. The problem with increasing prices is that it then becomes unaffordable to camp at the park and the park cannot compete with its competitors or change with the markets and demands. In addition the rental payment to Council (who own the land) is based on turnover so if the Park does well the QLDC also benefit financially.

Lake Hawea is a special place in that, like Wanaka it has a beautiful lake, great fishing and great walking and bike tracks. The main difference between Wanaka and Hawea is that Lake Hawea is away from the hustle and bustle. With the lakefront reserve there is unlimited access to the lakefront. Views are limited from the front rows of housing.

Lake Hawea is definitely a satellite town to Wanaka with the Lake Hawea Hotel providing accommodation and a restaurant, Sailz providing a store, restaurant and

takeaways and the Lake Hawea Holiday Park providing accommodation and shop in the summer and the Community Centre which provides a venue for the community and events. Visitors to the area are seasonal with the peak time being the summer period. Accommodation is limited to the Lake Hawea Hotel, Lake Hawea Holiday Park, holiday house rentals (note that holiday houses have a minimum of 3 night stay), and bed and breakfasts. In order for these businesses to be sustainable they must be operating 12 months of the year to cover overheads and retain staff. Without the increase in visitors to the area the towns become dormitory towns relying totally on the major centres eg Wanaka. We encourage our visitors to use the eating options in the township and we know that during the quiet times the owners are very grateful for the business as those seasons are tough.

Therefore we see it as being really important that to attract more visitors that stay more than one day that we definitely need more facilities and accommodation and it is important that the visitor season is extended to cover all seasons. We have a great lake, excellent walking and biking tracks but a shopping precinct in the centre of town or cottage industries scattered thorough out the town would add extra interest and encourage more people to visit the area and perhaps stay longer.

We are passionate about the area and tourism and the added value it can add to the community. We visualise Lake Hawea as being a gateway to the Queenstown Lakes area and we also see the area surrounding the campground and the Lake Hawea Holiday Park becoming one of New Zealand's premier resorts offering a range of facilities, activities and accommodation for people to choose from. Due to the topography of the land, the isolation from the town centre (but closeness) we can envisage a well-planned ecotourism type development offering a range of affordable options which will encourage and enhance the visitor experience to the area. The increase in visitor numbers utilising the towns shopping precinct and food/beverage outlets would be beneficial for the town all round.

There have been many changes in the holiday park industry with many parks offering a range of accommodation options and especially with an increase in motels, self-contained option and especially accommodation with ensuite facilities. We would like the Lake Hawea Holiday Park to be able to offer these options.

Without appropriate planning regimes the opportunities to further develop the area to provide for visitor facilities are minimal. There is no point investing further capital or effort into a lease or extending into new markets if facilities are not able to be built. With increasing costs it would not be economical to continue to maintain the reserve facility.

Campground and Surrounding Land

The Hawea Campground occupies 15.7 hectares immediately north of the Hawea Dam. The campground is in two parcels, both of which have the legal description Pt Sec 2 Block II Lower Hawea Survey District. Campground operations and facilities

extend over both parcels. However only part of the campground (the smaller Pt Sec 2 parcel of 2.8 hectares) is subject to designation 175 for motor park. The campground currently has an underlying zoning of Rural General (proposed as Rural).

The surrounding land around the campground (Lot 1 DP 418972 of 1.4 hectares and Lot 2 DP 418972 of 5.6 hectares) is owned by Glen Dene Ltd. These are separate parcels of land from the main farm and are currently zoned Rural General. The farming options for these parcels being so close to the camping ground, the topography and being a long narrow site are extremely limited.

I would like Council to look holistically at the planning framework for this area, including the extent of the campground designation, the underlying zoning of the campground, and the zoning of the land surrounding the campground. The consideration of the planning framework for this area represents an opportunity to help provide economic benefits for the Hawea community.

Combined this area covers approximately 23 hectares, and with an appropriate planning framework provides opportunities to provide for expanded accommodation options and visitor activities. This would provide a significant opportunity to extend the current campground markets beyond the traditional holiday season with school groups, events, weddings etc as well as ensuring that the campground remained economical and would be an asset to the community and the area.

Submission 1 – Extent of Designation 175

Designations	Proposal	Reasons
No. 175 Maps 8 and 17, QLDC, Purpose: Part of Hawea Recreation Reserve (Motor Park), SH6 (2.8ha) part Section 2, Block II, Lower Hawea SD.	To extend Designation 175 to cover campground operations and facilities which extend over both Pt Sec 2 Block II Lower Hawea Survey District parcels.	The extent of this designation has not be reviewed since the 1970s and does not accurately cover the extent of campground operations and facilities.
The Lake Hawea Camp is a privately owned camp on Crown land administered by QLDC.	Currently camping and campground facilities extend over the whole area of the reserve.	Tourism is a major economic driver for the district and we consider ourselves to be the Gateway to the QLDC district.
The Lease commenced in 1971 for a term of 33 years with a right of renewal from	Therefore the designation should cover the whole area of the Hawea Domain	

<p>2004. Glen Dene Holdings currently has the lease until 2037.</p> <p>The lessee owns all of the assets on the leased land with exception of the trees are owned by council. This includes the buildings and service facilities (septic, water systems, power supply etc).</p> <p>The lessee has taken over the development and maintenance of the whole of the Hawea Domain Reserve consisting of mature trees, well maintained grass areas and lake frontages at no cost to the council.</p> <p>The lessee pays rental as a percentage of turnover so the Council is being rewarded for the use of the land as a whole.</p>	<p>Reserve.</p> <p>The water and electricity supply network are over the whole park and are owned by the owners eg powered sites, irrigation etc.</p> <p>In order for buildings etc to proceed an outline plan of works needs to be agreed which outlines the impacts etc. Therefore we do not believe that further conditions need to be added to the motor park designation.</p>	<p>We experience requests for services that our current designation can not provide.</p>
--	--	--

Reasons:

- The designation was created in 1971 and we are now 2015. There have been a lot of changes to the camping ground since then and the designation doesn't reflect these changes or any future changes. As the camping area currently extends over the whole area it would make sense to have the designation cover the whole area. This would make it very clear, it would also tidy up the area. Currently the lessees are operating under motor camp on land that is not designated for motor camp.
- The whole reserve is currently being maintained by the lessee at the lessee's cost and the lessee pays a rental to Council as a percentage of turnover.
- The current designation doesn't fit with the topography of the land and does not fit with the running of the camping ground. Eg. The designation is not near the entrance to the park so the office is also located away from the entrance.
- Looking at the other reserves with Motor Camp designation Lake Hawea is the only camp with part designation.
- In order to put buildings on the camp ground the lessees need to apply for an outline plan approval so there is a solid process in place where any development needs to go through an outline plan approval through the Council.

- Different groups staying at the campground require separate facilities (eg campers and school groups don't usually mix well due to the noise of children). In order to get different groups we need to be able to identify specific areas for specific groups and be able to provide independent facilities for each group (eg campers do not want to be located and use facilities with noisy school groups).
- The camp facilities primarily located in the designation area and some of the camping is at the far end of the campground which makes it inconvenient for people to use in the night etc.
- The lease encourages the owner to put in continue to add more accommodation, however the designated area and the Rural zoning discourages expansion outside the designated area.
- Increasing the designated area would encourage the lessee to further develop the camping ground.
- We already maintain the whole area
- To be sustainable and retain good staff the campground needs to be operational for 12 months and provide more than just camping facilities and such facilities would allow the campground to extend beyond the summer months
- Need to encourage weddings, groups, school groups, bus groups, events etc
- There is are minimal facilities for wet weather and to cater for increase number of campers
- The office area is not well located within the campground and not at the entrance.

Submission 2 – Rural Visitor Zone

Currently the zoning of the camp and surrounding land – approximately 23 hectares is zoned Rural General. We submit that this area, including underlying the campground designation 175, be rezoned to Rural Visitor Zone.

Reasons for this:

The District Plan Fact Sheet notes that *“strong growth in tourism is predicted over the coming years and more accommodation will be needed for the growing numbers of holiday makers and temporary workers.”*

Lake Hawea has limited areas for visitor accommodation in the Town Centre due to a lack of areas available for zoning to occur.

As per the Rural Visitor Zone rules *“The Rural Visitor Zone applies to areas of land which are recognised as having visitor interest, are isolated from the town centres and can make a significant contribution to the range of accommodation and activities available within the District.”*

Lake Hawea Holiday Park is isolated from the Lake Hawea town centre by the Hawea dam.

It is right on State Highway 6 so it is easily accessible to tourist traffic heading from or to the West Coast.

It is 15 minutes from Lake Wanaka and services

Due to the topography of the land it can absorb different types of accommodation

We have had a number of groups approach us to host their groups. Many of these groups are of differing natures and therefore require different area and facilities. The construction of self-contained motel-like cabins would extend the patronage and the length of the season. This would be easier with a Rural Visitor zoning.

The park and surrounding area is large enough to have differing types of accommodation/facilities and activities.

The camping areas will remain and will not be substituted for other forms of visitor accommodation.

In order to put any buildings or structures in the park we have to go through the property management group APL and then an outline plan of works is put into council. This ensures that structures are appropriate, and suitably designed, located and serviced.

The amount of development that the site is capable of sustaining is limited by access from SH6 and the ability to service development (particularly wastewater).

As we have seen with other holiday parks such as Lakeview Holiday Park in Queenstown the extension of accommodation has added value to the park and guests.

Submission 3 – Extent of ONL around the Campground

The Lake Hawea Holiday Park and the land around it have been identified by the Proposed District Plan as being within an area of Outstanding Natural Landscape (ONL). This area should be considered as being within the Rural Landscape Classification as:

- The land is on a state highway
- The site and its surroundings have been heavily modified by the raising of the lake levels, clearance of native vegetation, construction of boating and camping facilities and the planting of trees to the extent that this is no longer a natural landscape.
- A commercial operation is operating on the land and at times is dominated by tents, caravans and motor homes.

We feel the whole Lake Hawea lake area has had no consideration on landscape classifications and that when looking at areas around Lake Wanaka shows numerous areas there not identified as ONL but very similar to our areas.

Submission 4 – Rural areas & issues

Glen Dene is concerned that many farmers are not entirely aware of the zones and rules that could be placed on their properties under with the review of the district plan, hence making some of the regulations that govern how they farm more complex for their property managers. If you take an example of the Vegetation clearance rules these looks complex and I would urge the planners to reconsider. The last court cases that involved several lawyers and ecologist still beg to differ.

As a farming property then they should all be treated the same and it should not be based around landscape classifications. Within the Rural zone farmers should be able to carry out reasonable levels of earthworks as a permitted activity. The Rural provisions that affect farms should not be complex and require input in from Landscape planners who add unnecessary cost into a business.

The more complex you make the rules in the more the farming community will want detail landscape Zone done,

The detail Zone boundaries and maps required between ONL and RLC as many farmers would argue that only parts of their farms may fall into ONL not blanket areas this may cause the plan to get bogged down.

Landscape protection vs. the right to farm is an important issue.

I am concerned that the criteria (Objective 33.2.1.9) for the identification of significant natural areas appears to have been based on subjective ecological perceptions of significance or the LENZ threatened environment identifications, rather than clearly defined objective criteria, and this may have led to modified communities that still retain indigenous components being identified as significant. Also of concern is that these criteria did not consider whether these areas were already adequately protected. In Glen Dene's case 2,000 hectares has already been set aside for its conservation values he 2000 hectares already protected and call it "Significant " , " Rare", and "In danger". I do not want this to be imposed on our property and believe this is not the objective of the Resource Management Act.

Had something significant been identified I would be interested; however I believe this not the case.

So we do not support the small areas being included B16A) as areas of significant natural areas based on the following;

- The areas have been set aside as areas for carbon farming they are regenerating native areas.
- We would never be able to get consent to clear these areas as they would not be able to be clear under the current vegetation clearance rules. There are clear rules with regards to clear native areas under the district plan.
- We find it overkill that for one area of land you need a mechanism to protect and on the other hand a mechanism to clear, if you were making things easy to manage within the District Plan then you it would be good if you consider this before adding this on properties.
- We challenge that the areas is not significant as describe in the council report and that there is plenty of land & habit for the Falcon in our area.

Relief Sought: to remove areas of Significant Natural Areas from Glen Dene Station

Submission point – Farm Tracks

Earthworks for the formation of farm tracks should be considered as a permitted activity. The exemption for maintenance of tracks is supported, but this should be taken further and extended to include the formation of farm tracks across all the landscape zones if the property is being managed for farming purposes.

We support greater permitted activities in the ONL, Discretionary is not clear enough. And would prefer as a farmer to be rat the same as other rural landscape in the case of earthworks.

We note that typically when Discretion is required in ONL then traditionally that means notified which has leads to constant objectors with no real grounds other than a free right to object. Discretionary Activities are supported as long as this does not provide for further increases in the number of consent applications in the Rural zone, as this makes development expensive and too difficult.

We believe there is a zone in other districts like Mackenzie District that allows future development within the farming business. We would like to see something similar introduced as a new or special zone in this district.

Recognises that large parts of the District are within the ONL and reasonable to allow development if it is appropriate.

Large areas blanket in the Hawea area not given the same consideration as other areas around Lake Wanaka, the criteria and application for the identification of areas of ONL needs to be consistent across the district.

Proposed District Rules	Plan	Support/Oppose	Comment
21.4.2		Support	Support the specific identification of farming as a permitted activity.
21.4.3		Support	Support identifying farm buildings as a permitted activity.
21.4.6 and 22.4.3.1		Support	Support construction of a residential unit and associated accessory buildings on a building platform as a permitted activity.
21.4.7 and 22.4.3.2		Support	Support enabling the construction and exterior alterations to buildings within a building platform as a permitted activity.
21.4.8		Support	Support enabling exterior alterations to legally established buildings not on a building platform as a permitted activity.
21.5.4		Support	Support 20m building setback from water bodies.
21.5.5		Support	Support proposed controls.
21.5.6		Support	Support proposed controls.
21.5.7		Support	Support proposed controls.
21.5.8		Support	Some areas are able to absorb this type of farming
21.5.18		Support/Oppose	Support farm buildings as permitted activities in Rural Landscape Classification subject to proposed standards. Rule 21.5.18.6 Support that farm buildings in Outstanding Natural Landscapes be permitted, but seek that 21.5.18.4 be amended to provide for buildings up to 200m ² and 5m in height. Support proposed matters for discretion.
Indigenous Vegetation		Oppose	Some comments on QLDC Indigenous Veg. Plan Change. 1. Identification of SNA's by QLDC strongly dependent on subjective ecological perception of significance, not clearly defined objective criteria. The critical point is separation of genuinely significant from modified communities that still retain indigenous

		<p>components.</p> <ol style="list-style-type: none"> 2. Hence the marked difference ecological assessment's of value in the Innes & Phiskie cases. (The judgements in both cases did not concur with the assessment the QLDC ecologist's advice provided to the council). 3. A key omission is the revision is complete absence of evaluation of "adequacy of protection" of the indigenous vegetation/ fauna. 4. The assessment of vegetation value requires assessment against other land use values before it is used as a determinative for land use. 5. The assessment must be on actual indigenous vegetation present not indirect indices such as LENZ threatened environments.

In general, The Rural General zone subdivision has been fully discretionary for a number of years. One essential element of a fully discretionary regime is that a landowner or developer has absolutely no certainty as to what could be achieved. The only way you can find out what can be achieved is to go to the expense of applying for consent and seeing what you end up with.

Submission 5 – Glen Dene Homestead Area

It is sought that an approximately 13 hectare area around the Glen Dene Homestead be rezoned from Rural to Rural Lifestyle to provide for up to 6 houses/lots. There are three existing houses in this area. The location and extent of this area is shown on the attached plan. The plan also shows a no-build area setback from the edge of the lake to separate development from the lake and to ensure that future houses are located in less sensitive areas of the site.

We would ask consider allowing Rural Residential around identified homestead area and or special zone to allow for future growth of our tourism and farming business. Glen

Dene is an ideal example where there already exists as a highly modified area with four houses and a woolshed.

We would like to see an area around the Glen Dene Homestead zone Rural Residential or as separate special zone to allow for future buildings and or extra houses in what already exists as a highly modified area including three houses and a woolshed. The nature of our business are also changing, we require more staff and Visitor type accommodation.

We **oppose** being zone ONL our around our farming curtilage. **Relief sort** would be an areas zoned rural residential as identified.

Access would be from the existing homestead entrance, wastewater and stormwater would be to ground, with water coming from the current onsite supply.

Richard Burdon wishes to be heard in support of all of his submissions



Location:
Homestead Area, Glen Dene Station

Purpose & Drawing Title:
Area to be Rezoned Rural Lifestyle

Scale:
1:2500 @ A3

Date Created:
23/10/2015