

13 February 2026

██████████  
Sent via email to ██████████

## **Request for Official Information LG26-0014 – Busking Bylaw Proposal, Adoption, and Application Changes**

Dear ████████,

Thank you for your request for information held by the Queenstown Lakes District Council (QLDC). On 15 January 2026 you requested the following information under the Local Government Official Information and Meetings Act 1987 (LGOIMA):

### **Statement of Proposal – asserted continuity**

Please provide records relating to the Statement of Proposal's assertion that online application or registration requirements for activities beyond busking applied "as has always been the case", including:

1. The source material, policy, practice note, or legal basis relied upon to support that assertion;
2. Drafts and version history of the Statement of Proposal showing when and how that wording (including any parenthetical references) was inserted or amended;
3. Any internal review comments, legal advice, or approvals relating to that wording;
4. Any consideration of whether the Statement of Proposal accurately reflected the draft proposed bylaw text consulted on.

### **June 2023 hearing report – adoption "as notified"**

Please provide any records created after adoption of the bylaw that:

5. Identify or discuss any departure from the basis recorded in the June 2023 hearing report that the bylaw would be adopted "as notified" and "without change"; and
6. Explain how subsequent administrative, enforcement, or digital practices were considered to align with that adopted basis.

### **Website and application interface changes (time-bound)**

Please provide records sufficient to identify:

7. The dates and times when:
  - a. Queenstown CBD locations (including the lakefront) were removed from the online application interface;
  - b. those locations were reinstated;
  - c. Beach Street and Ballarat Street were reintroduced; and
  - d. any bespoke or separate application pathway for clause 12.2 permits was created or activated.
8. The roles or positions (not personal data) that authorised or requested each change.
9. Any internal explanation of whether those changes were:
  - a. implementation of the 17 April 2025 resolution as originally worded;

- b. corrective steps following recognition of the miscommunication;
- c. interim measures; or
- d. responsive to legal or enforcement considerations.

#### **Miscommunication and corrective steps**

Consistent with the High Court minute of 28 November 2025, please provide:

10. Records identifying how the wording of the 17 April 2025 resolution was understood internally prior to the 6 May 2025 email being sent;
11. Records relating to the drafting, approval, and issuing of the 6 May 2025 email;
12. Any internal recognition that the email was erroneous or misleading;
13. Records authorising or implementing corrective steps, including any changes to website content or application systems;
14. Any consideration of whether affected stakeholders should be notified of the correction, and any decision not to do so.

#### **QLDC RESPONSE**

In response to your request, we consulted with the QLDC Monitoring and Enforcement Team.

#### **Decision to release information**

##### **Statement of Proposal – asserted continuity**

Please provide records relating to the Statement of Proposal’s assertion that online application or registration requirements for activities beyond busking applied “as has always been the case”, including:

3. Any internal review comments, legal advice, or approvals relating to that wording;

Approvals relating to the wording of the Statement of Proposal (SoP) and how it was inserted or amended is publicly available on the QLDC website. This information can be found under the [Full Council Meeting held on 23 March 2023](#), Item 12.

Please find attached the [records relating to the approval of the wording](#). These records have been released with minor redactions. The reasons for withholding information are outlined below.

Please note that the enclosed link will expire on 14 March 2026, 11:24 AM (UTC+12:00) Auckland, Wellington.

4. Any consideration of whether the Statement of Proposal accurately reflected the draft proposed bylaw text consulted on.

##### **Website and application interface changes (time-bound)**

Please provide records sufficient to identify:

7. The dates and times when:
  - a. Queenstown CBD locations (including the lakefront) were removed from the online application interface;

The Queenstown Central Business District (CBD) locations (including the lakefront) were removed from the online application interface for pop-up stalls on 22 April 2025. Confirmation of this change was received at 1:53pm.

The QLDC website commentary was also updated to reflect the Council resolution of 17 April 2025.

- b. those locations were reinstated;**
- c. Beach Street and Ballarat Street were reintroduced; and**

The locations were reinstated in the online application interface, including Beach Street and Ballarat Street, on 2 October 2025. Confirmation of this change was received at 3:13pm.

Please find attached [correspondence relating to pop-up stall, busking or charity street collection locations being reintroduced to the QLDC website](#).

Please note that the enclosed link will expire on 15 March 2026, 12:51 PM (UTC+12:00) Auckland, Wellington.

**8. The roles or positions (not personal data) that authorised or requested each change.**

Authorisation for, or requests relating to, each change were made by the QLDC Monitoring, Enforcement and Environmental Manager.

**9. Records relating to the drafting, approval, and issuing of the 6 May 2025 email;**

Please find attached the [records relating to the approval and issuing of the 6 May 2025 email](#). These records have been released with redactions. The reasons for withholding information are outlined below.

Please note that the enclosed link will expire on 14 March 2026, 11:27 AM (UTC+12:00) Auckland, Wellington.

**Miscommunication and corrective steps**

**Consistent with the High Court minute of 28 November 2025, please provide:**

QLDC has no directions made by the Court in respect of disclosure of information.

**10. Any internal recognition that the email was erroneous or misleading;**

There was a verbal acknowledgment and discussion between the QLDC Monitoring, Enforcement and Environmental Manager and the QLDC Regulatory Manager.

**11. Records authorising or implementing corrective steps, including any changes to website content or application systems.**

The QLDC Monitoring, Enforcement and Environmental Manager has authority to implement corrective steps, including making changes in response to requirements under the relevant Bylaw, in accordance with the scope of that role.

Please find attached the [records](#) authorising and/or implementing the relevant corrective actions, including any associated updates to website content or application systems. These records have been released in full as the information has now been updated on public record.

Please note that the enclosed link will expire on 15 March 2026, 4:11 PM (UTC+12:00) Auckland, Wellington.

## **Decision to withhold information**

### **Statement of Proposal – asserted continuity**

**Please provide records relating to the Statement of Proposal’s assertion that online application or registration requirements for activities beyond busking applied “as has always been the case”, including:**

- 2. Drafts and version history of the Statement of Proposal showing when and how that wording (including any parenthetical references) was inserted or amended;**
- 3. Any internal review comments, legal advice, or approvals relating to that wording;**

QLDC has good reason under section 7(2)(f)(i) of the LGOIMA for withholding part of the information requested. QLDC considers it is necessary to withhold part of the requested information on the basis of the following grounds:

- Section 7(2)(f) - the withholding of the information is necessary to maintain the effective conduct of public affairs through—
  - i. the free and frank expression of opinions by or between or to members or officers or employees of any local authority in the course of their duty.

Section 7(2)(f)(i) of the LGOIMA is intended to uphold the effective conduct of public affairs by ensuring that members, officers, and employees of local authorities can express their opinions freely and frankly in the course of their duties. This provision recognises that open communication is essential for informed decision-making and effective governance.

In this case, the withheld information consists of draft versions containing candid exchanges among officials regarding a business matter. Releasing such information could inhibit honest discussions and lead to self-censorship, ultimately undermining the quality of advice and deliberations within the local authority.

The need to maintain an environment where officials can express their views without fear of public scrutiny is paramount. Thus, the rationale for withholding the requested information is to protect the integrity of the decision-making process and ensure that public affairs are conducted effectively.

### **Statement of Proposal – asserted continuity**

**Please provide records relating to the Statement of Proposal’s assertion that online application or registration requirements for activities beyond busking applied “as has always been the case”, including:**

#### **3. Any internal review comments, legal advice, or approvals relating to that wording;**

QLDC has good reason under section 7(2)(g) of the LGOIMA for withholding part of the information requested. QLDC considers it is necessary to withhold the requested information on the basis of the following grounds:

- Section 7(2)(g) – the withholding of the information is necessary to maintain legal professional privilege.

Section 7(2)(g) of the LGOIMA permits the withholding of official information to maintain legal professional privilege. This privilege safeguards the confidentiality of legal advice, ensuring that it can be sought and provided freely without concern of disclosure, thereby supporting effective legal counsel and preserving the integrity of legal processes.

In this case, all information in this category is subject to legal privilege. Section 7(2)(g) of the LGOIMA recognises the protection of legal professional privilege as a valid ground for withholding information, underscoring the essential role of confidentiality in legal decision-making. This safeguard is essential for ensuring effective legal counsel and preserving the integrity of legal processes.

#### **3. Any internal review comments, legal advice, or approvals relating to that wording;**

QLDC has good reason under section 7(2)(f)(ii) of the LGOIMA for withholding some of the information requested. QLDC considers it is necessary to withhold this information on the basis of the following grounds:

- Section 7(2)(f) - maintain the effective conduct of public affairs through—
  - ii. the protection of such members, officers, employees, and persons from improper pressure or harassment.

Section 7(2)(f)(ii) of the LGOIMA protects individuals—such as members, officers, and employees— from improper pressure or harassment, ensuring the effective conduct of public affairs. This provision safeguards public officials from undue influence or intimidation, enabling them to perform their duties impartially and effectively.

In this case, we have provided the roles of individuals and withheld the names and contact emails, to avoid the risk of harassment. The protection of these individuals from improper pressure or harassment takes precedence over the public interest in disclosing specific information. Releasing the names and contact emails could potentially lead to undue pressure or intimidation, which could undermine the effective conduct of public affairs and harm the safety and well-being of those involved. Therefore, withholding this information is justified to preserve both individual rights and the integrity of public offices.

## **Decision to refuse information**

### **Statement of Proposal – asserted continuity**

**Please provide records relating to the Statement of Proposal’s assertion that online application or registration requirements for activities beyond busking applied “as has always been the case”, including:**

- 1. The source material, policy, practice note, or legal basis relied upon to support that assertion;**

QLDC has good grounds under section 17(d) of the LGOIMA for refusing the information requested. QLDC considers it is necessary to refuse the requested information on the basis of the following grounds:

- Section 17(d) - that the information requested is or will soon be publicly available that the information requested is or will soon be publicly available

Section 17(d) of the LGOIMA provides that a request may be refused where the information requested is already publicly available or will soon be made publicly available. This provision recognises that the Act is not intended to require the release of information where it can reasonably be accessed by the public through other means, and doing so would not advance the purposes of the Act.

In this instance, the information sought is contained within the records on the QLDC Let’s Talk website, which are publicly accessible [here](#).

As the information is available through an existing public source, withholding it under section 17(d) does not prejudice transparency or accountability. The public interest in access is met through the publication of the document, and there is no additional public interest served by re-releasing the information under the LGOIMA. Accordingly, refusal of the request on this ground is appropriate and consistent with the Act.

### **Statement of Proposal – asserted continuity**

**Please provide records relating to the Statement of Proposal’s assertion that online application or registration requirements for activities beyond busking applied “as has always been the case”, including:**

- 5. Identify or discuss any departure from the basis recorded in the June 2023 hearing report that the bylaw would be adopted “as notified” and “without change”; and**

### **Website and application interface changes (time-bound)**

**Please provide records sufficient to identify:**

- 7. The dates and times when:**
  - d. any bespoke or separate application pathway for clause 12.2 permits was created or activated.**

## **Miscommunication and corrective steps**

**Consistent with the High Court minute of 28 November 2025, please provide:**

**12. Any consideration of whether affected stakeholders should be notified of the correction, and any decision not to do so.**

QLDC has good reason under section 17(e) of the LGOIMA for refusing the information requested. QLDC considers it is necessary to refuse the requested information on the basis of the following grounds:

- Section 17(e) – that the document alleged to contain the information requested does not exist or, despite reasonable efforts to locate it, cannot be found.

Section 17(e) of the LGOIMA clarifies that a local authority is not required to provide information that does not exist or cannot be found despite reasonable efforts. This ensures that the absence of information is not due to negligence but reflects its genuine non-existence.

Following reasonable enquiries, no records beyond the SOP exist regarding the proposal to maintain the registration requirements unchanged.

Similarly, Council has not identified any records suggesting that a bespoke or separate application pathway for clause 12.2 permits was created or implemented. A standard application pathway for permits under the Bylaw has always been in place, with no new or separate process established.

In addition, the website has been updated to reflect this information as a public record.

The Act does not require a local authority to create information where none exists, or to provide information that cannot be found despite reasonable efforts to locate it.

## **June 2023 hearing report – adoption “as notified”**

**Please provide any records created after adoption of the bylaw that:**

- 6. Explain how subsequent administrative, enforcement, or digital practices were considered to align with that adopted basis.**

## **Website and application interface changes (time-bound)**

**Please provide records sufficient to identify:**

- 9. Any internal explanation of whether those changes were:**
  - a. implementation of the 17 April 2025 resolution as originally worded;**
  - b. corrective steps following recognition of the miscommunication;**
  - c. interim measures; or**
  - d. responsive to legal or enforcement considerations.**

QLDC has good grounds under section 17(g) of the LGOIMA for refusing the information requested. QLDC considers it is necessary to refuse the requested information on the basis of the following grounds:

- Section 17(g) - that the information requested is not held by the local authority and the person dealing with the request has no grounds for believing that the information is either—
  - i. held by another local authority or a department or Minister of the Crown or organisation

Section 17(g) of the LGOIMA clarifies that a local authority is not required to provide information that is not held. This ensures that a request cannot compel the creation of new information, explanations, or justifications, and that a refusal reflects the genuine absence of the requested material rather than any failure on the part of QLDC.

Following reasonable enquiries, QLDC has determined that the items of your request seek explanations, analysis, or opinions rather than information that is already held. The Act provides a right of access to official information that exists but does not require a local authority to generate new information to satisfy a request.

Accordingly, this part of your request is refused under section 17(g) of the Act, as the information requested is not held by QLDC.

### **Public interest considerations**

In assessing whether to withhold information, QLDC carefully evaluates the public interest—particularly whether disclosure would enhance transparency, accountability, or informed public engagement. This assessment includes weighing those benefits against the potential harm that could result from releasing the information.

QLDC recognises the public interest in transparency and accountability in local authority decision-making, as well as the broader interest in good governance. We are committed to releasing information wherever possible. However, in this instance, QLDC considers that the public interest in disclosure is outweighed by the need to protect the integrity of the decision-making process and ensure that public affairs are conducted effect; to protect individuals from improper pressure or harassment and to protect information subject to legal privilege. Release of the information could reasonably be expected to unreasonably inhibit free and frank internal discussion, expose staff to bullying or harassment, and compromise the confidentiality of privileged information.

Accordingly, QLDC has determined that sections 7(2)(f)(i) and 7(2)(g) of the LGOIMA apply. No overriding public interest has been identified that would justify release of the withheld information.

### **Consultation with requester**

QLDC has considered the volume, scope, and tone of a number of recent requests made by you (the requester) under the LGOIMA.

While QLDC remains committed to meeting its obligations under the Act and facilitating access to official information wherever reasonably possible, QLDC notes that aspects of the recent requests and correspondence raise concerns that future requests of a similar nature may meet the threshold of being considered frivolous or vexatious under section 17(h) of the LGOIMA.

At this time, QLDC has not refused any request on this basis. However, we wish to make you aware that should future requests continue in a similar manner - including where the tone, repetition, or

cumulative effect of requests places an unreasonable burden on QLDC resources - QLDC may consider section 17(h) when assessing those requests.

QLDC encourages any future requests to be framed clearly, reasonably and in a manner consistent with the purpose of the LGOIMA, to enable QLDC to continue engaging constructively and responding substantively.

Please note that this correspondence is intended to provide transparency about QLDC's position and does not constitute a refusal of any current request.

### **Right to review the above decision**

Note that you have the right to seek an investigation and review by the Ombudsman of this decision. Information about this process is available at [www.ombudsman.parliament.nz](http://www.ombudsman.parliament.nz) or freephone 0800 802 602.

If you wish to discuss this decision with us, please contact [Rebecca.Pitts@qldc.govt.nz](mailto:Rebecca.Pitts@qldc.govt.nz) (Engagement and Communications Manager).

We trust that the above information satisfactorily answers your request.

Kind regards,

██████

Democracy Services Team  
Corporate Services | Queenstown Lakes District Council  
P: +64 3 441 0499  
E: [informationrequest@qldc.govt.nz](mailto:informationrequest@qldc.govt.nz)

**From:** [REDACTED]  
**Sent:** Tue, 11 Nov 2025 16:29:10 +1300  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Activities in Public Places Bylaw - Removal from website

Hi [REDACTED],

Sorry – just the sections I've snipped need to be removed please

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<p>[REDACTED] Monitoring, Enforcement &amp; Environmental Manager   Assurance, Finance and Risk Queenstown Lakes District Council DD: [REDACTED]   P: +64 3 441 0499 E: [REDACTED]</p>	 <b>QUEENSTOWN LAKES DISTRICT COUNCIL</b>
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**From:** [REDACTED]  
**Sent:** Tuesday, 11 November 2025 4:27 PM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Re: Activities in Public Places Bylaw - Removal from website

Hello – those sections of the webpages or the entire webpages?

Cheers,  
[REDACTED]

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**From:** [REDACTED]  
**Sent:** Tuesday, November 11, 2025 4:13:09 PM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Activities in Public Places Bylaw - Removal from website

Hi [REDACTED],

Can you urgently please remove the below from the two websites?

[QLDC - Conditions for Activities in a Public Place](#)

Additionally, the Council agreed to cease issuing new permits for pop-up stalls within the Queenstown Town Centre Zone, effective immediately. Pop-up stalls still have the option of registering to trade in the Queenstown Town Centre Zone (excluding the Queenstown lakefront).

### **What if I'm applying for a new pop-up stall, busking or charity street collection permit?**

Pop-up stalls:

If you're registering for a new pop-up stall, you are be permitted to trade in the following locations:

- > Beach Street
- > The Mall
- > Arrowtown – Corner of Buckingham Street and Wiltshire Street
- > Wanaka – Corner of Ardmore Street and Helwick Street

Note: New pop-up stalls permits or registrations will not allow trading on the Queenstown lakefront currently. New registrations can be obtained to operate within the Queenstown Town Centre Zone (excluding the Queenstown lakefront).

#### QLDC - Permits

Additionally, the Council agreed to cease issuing new permits for pop-up stalls within the Queenstown Town Centre Zone, effective immediately.

## What if I'm applying for a new pop-up stall, busking or charity street collection permit?

Pop-up stalls:

If you're applying for a new pop-up stall permit, you will only be permitted to trade in the following locations:

- > Arrowtown – Corner of Buckingham Street and Wiltshire Street
- > Wanaka – Corner of Ardmore Street and Helwick Street

Note: New permits will not allow trading on the Queenstown lakefront or within the Queenstown Town Centre Zone.

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██████████  
Monitoring, Enforcement & Environmental Manager | Assurance, Finance and Risk  
Queenstown Lakes District Council  
DD: ██████████ | P: +64 3 441 0499  
E: ██████████



**From:** [REDACTED]  
**Sent:** Wed, 1 Mar 2023 13:44:28 +1300  
**To:** "QLDC Governance" <governance@qldc.govt.nz>  
**Cc:** [REDACTED]  
**Subject:** Report - Consultation - Draft Activities in Public Places Bylaw 2023 for 23 March Council meeting  
**Attachments:** Report to Council - Draft Activities in Public Places Bylaw 2023 for 23.3.23 meeting.docx, Council Papers - Bylaws, Attachment B Current Activities in Public Places Bylaw 2016.pdf, Attachment C - SOP draft Activities in Public Places Bylaw 2023.pdf, Attachment A - Draft Activities in Public Places Bylaw 2023.pdf

Kia ora governance,

Attached are reports for this agenda item as well as MMO's GM approval:

- Report to Council
- Attachment A - Draft Activities in Public Places Bylaw 2023
- Attachment B - Current Activities in Public Places Bylaw 2016
- Attachment C - Statement of proposal

Don't hesitate to get in touch if you have any queries.

Thanks,

[REDACTED]

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[REDACTED] | Senior Policy Advisor | Kaiārahi Matua  
Kaupapa Here  
Strategy and Policy  
DD: [REDACTED] | P: +64 3 441 0499  
E: [REDACTED]



### QLDC Council

23 March 2023

#### Report for Agenda Item | Rīpoata moto e Rāraki take [Governance to Complete]

**Department: Strategy & Policy**

**Title | Taitara : Consultation - Draft Activities in Public Places Bylaw 2023**

#### Purpose of the Report | Te Take mō te Pūroko

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1. The purpose of this report is to present Council with the draft Activities in Public Places Bylaw 2023 / Ngā ture mahi ki ngā wāhi tūmatanui and seek that that Council endorse the draft bylaw for formal consultation, via the special consultative procedure.

#### Executive Summary | Whakarāpopototaka Matua

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2. The Activities in Public Places Bylaw 2016 is due for review and will automatically expire if not reviewed prior to September 2023. For the bylaw to continue past this date, Council will need to adopt a new bylaw.
3. If Council endorses the draft bylaw and adopts the statement of proposal for consultation, staff will undertake a consultation process in accordance with the Special Consultative Procedure from 8am 3 April 2023 to 5pm 5 May 2023.

#### Recommendation | Kā Tūtohuka


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4. That QLDC Council:
  1. **Note** the contents of this report;
  2. **Note** that the Community and Services Committee recommended that Council endorse the draft Activities in Public Places Bylaw 2023 / Ngā ture mahi ki ngā wāhi tūmatanui for consultation;
  3. **Determine** pursuant to section 155(1) of the Local Government Act 2002 that a bylaw is the most appropriate way of addressing the problems related to busking, trading, events, the consumption of mind-altering substances, the distribution of leaflets and licenced premises tours in public places;
  4. **Determine** pursuant to section 155(2)(a) of the Local Government Act 2002 that the draft Activities in Public Places Bylaw 2023 is the most appropriate form of bylaw;
  5. **Determine** pursuant to section 155(2)(b) of the Local Government Act 2002, that the draft Activities in Public Places Bylaw 2023 does not give rise to any implications under the New Zealand Bill of Rights Act 1990;
  6. **Endorse** the draft Activities in Public Places Bylaw 2023 / Ngā ture mahi ki ngā wāhi tūmatanui (Attachment A);

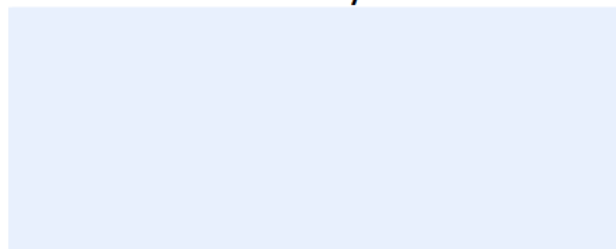
7. **Adopt** the statement of proposal outlined in Attachment C for consultation in accordance with the Special Consultative Procedure outlined in sections 83 and 86 of the Local Government Act 2002, from 8am Monday 3 April 2023 to 5pm Friday May 5 2023.
8. **Appoint** four councillors (to be named) of which three are required to form a hearings panel to hear and consider the submissions on the proposal and make recommendations to the Council on adoption of the draft bylaw.


**Prepared by:**



  
Senior Policy Advisor  
23 February 2023

**Reviewed and Authorised by:**



  
GM Strategy and Development  
Click or tap to enter a date.

### Context | Horopaki

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#### The bylaw review process

5. The Local Government Act 2002 (LGA) requires councils to review their bylaws every five years, and in some cases, every ten years. When a bylaw is first made, if it is reviewed by Council within five years, the subsequent review period is ten years. If a bylaw is not reviewed within five years of being made, there is a two year grace period within which the bylaw is still valid, after which it automatically expires. A review done in the two year grace period invokes a subsequent five year review requirement.
6. Two bylaws are currently under review and are being progressed and consulted on together for efficiency. This includes:
  - Activities in Public Places Bylaw 2016 - in place since November 2016 and due for review and will expire if not reviewed prior to September 2023. Once reviewed, it will next have a five year review requirement.
  - Alcohol Restrictions in Public Places Bylaw 2018 - in place since November 2018, last reviewed in 2018 and due for review this year. If the review is completed before October 2023, it is eligible for a ten year review period.
7. The Alcohol Restrictions in Public Places Bylaw 2018 is addressed in a separate report.
8. Before commencing the process for making or reviewing a bylaw (including consultation), Council is required to make the determinations in section 155 of the LGA. This is to determine whether a bylaw is the most appropriate way of addressing the perceived problem, whether the proposed bylaw is in the most appropriate form, and if it gives rise to any implications under the New Zealand Bill of Rights Act 1990. These requirements are canvassed in this report.
9. The bylaw has now reached the stage in the process for public consultation. The current progress of the bylaw is set out in the diagram below.



10. Preliminary engagement was undertaken on both bylaws during November 2022 to gather information as to what stakeholders view as the main issues with these bylaws. Targeted emails were sent to stakeholder groups, inviting them to provide feedback on Council's Let's Talk platform. Anyone in the community could also respond to the online survey.
11. Generally, the feedback received about the bylaw were positive, and that the current system is working well. Comments about trading and busking were mixed, with concerns raised that the noise caused by buskers (both with and without speakers) can dominate the lakefront environment in Queenstown.

12. The draft bylaw was presented to the Community and Services Committee (the committee) at its 21 February 2023 meeting. The committee recommended that Council endorse the draft bylaw for consultation.

### **The Activities in Public Places Bylaw 2016**

13. The purpose of the Activities in Public Places Bylaw 2016 includes protecting the public from nuisance, and currently contains specific provisions including:
- a ban on the consumption of mind-altering substances in public places
  - a ban on the distribution of leaflets in connection with a trading activity in a public place
  - requiring permission for events in public places
  - requiring permission for organised licensed premises tours in public places (commercial pub crawls)
  - requiring registration for busking in public places.

### **Analysis and Advice | Tatāritaka me kā Tohutohu**

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### **Proposed changes to the Activities in Public Places Bylaw 2016**

14. The main features of the bylaw and proposed changes are discussed below. All proposed changes are annotated in the draft Activities in Public Places Bylaw 2023 at Attachment A. The Analysis and Advice section of this report also provides analysis for the purpose of meeting Council's obligations under section 155 of the LGA.

#### Commercial hire of micromobility devices (e-scooters)

15. The key change recommended in the draft Activities in Public Places Bylaw 2023 is to add the commercial hire of micromobility devices in public places to the definition of 'trading activity' that may be regulated via the bylaw. This includes dockless e-scooters, but in the future could also include the commercial hire of e-bikes and other similar devices.
16. In December 2022, Council endorsed entering a memorandum of understanding (MOU) with micromobility device operator Beam for the operation of an e-scooter trial in Queenstown, Frankton and Wānaka ([Full Council \(qldc.govt.nz\)](https://www.qldc.govt.nz)). The draft MOU provides that Beam will ensure that e-scooters cannot be parked, or rides terminated, in the areas outside the deployment locations, which are on private land.
17. It is not recommended that Council regulate the commercial hire of micromobility devices occurring on private land through this bylaw, because the LGA bylaw-making provisions relate primarily to public places.
18. However, it is recommended that the bylaw be drafted to enable Council to regulate the hire and parking of micromobility devices on public land, by requiring permission of Council for this activity. Conditions and restrictions may be provided for in the bylaw or in a separate policy.

19. Potential problems resulting from this type of trading occurring in a public place is overcrowding of that place, leading to nuisance, obstructions and possible safety issues. Competing activities and general use by the public will need to be managed properly.
20. An alternative option is for Council to determine that a voluntary MOU is sufficient to regulate this activity to address any perceived problems. However, there is no guarantee that all micromobility providers would be amenable to entering into and complying with a MOU. Additionally, providers are indicating that their preference would be to utilise public land for parking and hire of micromobility devices. A bylaw provides Council with the ability to make requirements similar to those outlined in the MOU, and to take enforcement action if necessary.
21. Council needs to be aware that enforcement of the bylaw may not be straightforward. There is no infringement regime that will allow fines to be issued, therefore Council is largely confined to bringing a prosecution when a breach of the bylaw occurs.

#### Ban on the consumption of mind-altering substances in public places

22. This ban was added to the bylaw as an outcome of the 2016 review and was supported by Police and the District Health Board of the time. The problems associated with the consumption of mind-altering substances in public places include the potential for an unsafe public environment and offensive behaviour.
23. Police have advised that the ban is a useful tool with respect to butane/ solvent abuse in public places, primarily by itinerant individuals, as these are volatile substances for which there is no other directly applicable legislation to prevent their use in public. The ban protects the public and maintains public health and safety, as well as minimising the potential for offensive behaviour in public places. Police use the ban to ensure that solvent abuse is not occurring in public places in the district. An alternative would be to rely on Police powers to react to offensive behaviour as an outcome of this activity. However, the ban allows Police to ensure that solvent abuse may be stopped when detected, rather than waiting for detrimental effects. It is proposed to maintain the current provisions in the bylaw.

#### Ban on the distribution of leaflets in connection with a trading activity in a public place

24. The provision in the current bylaw is very narrow and only applies to leaflet distribution in connection to a trading activity in a public place. From the 2016 bylaw review it is evident that the problem is connected to leaflets placed on cars or handed out in a public place that relate to any business or event (whether the business trades from a public place or not) and the litter created by this activity. The distribution of leaflets is used to promote local businesses due to the high number of visitors to the district. It is therefore recommended to increase the scope of this provision, to address leaflets and material handed out in a public place in relation to any commercial activity or business.
25. Officers consider that the alternative of relying on the Litter Act 1979 alone is insufficient to address this problem. This is because although fines may be issued under the Litter Act 1979, the bylaw allows Council to take enforcement steps when someone is in the process of handing out leaflets, before any actual littering occurs.
26. If the ban were to extend beyond commercial activities and businesses, it would likely be inconsistent with the New Zealand Bill of Rights Act 1990 (NZBORA). Under the NZBORA, a bylaw may only be valid where it can be found to be a reasonable limit that “can be demonstrably justified in a free and democratic society” (section 5). The application of this principle means that there is a distinction

between leaflets advertising goods or services, as compared to those expressing religious, political or other views. To further guard against a challenge under the NZBORA, a purpose for this clause to clarify that it is aligned with the prevention of litter has been added to the draft bylaw.

### Requiring permission for events in public places

27. The potential problems from this type of activity without proper management include overcrowding of public places, leading to nuisance, obstructions and possible health and safety issues. Currently an event organiser is required to obtain permission from Council, and the bylaw enables Council to impose certain conditions on the event permission.
28. Alternatives to a bylaw such as a policy, procedure or guidelines would not give Council the same enforcement mechanisms as a bylaw, therefore a bylaw is considered the most appropriate option. It is proposed to maintain the provisions in the bylaw for events in public places. There is a programme of work scheduled to review and improve the internal system for processing event and film applications.

### Requiring permission for organised licensed premises tours in public places (pub crawls)

29. The potential problems from organised licensed premises tours in public places (pub crawls) include overcrowding of certain places, leading to nuisance and possible health and safety issues or offensive behaviour in public places.
30. It is recommended that the current bylaw requirement that tour organisers need Council permission where a tour occurs in any public places is maintained. The bylaw allows conditions to be imposed on tour operators to manage this activity to avoid these issues, as well as the ability to enforce these conditions. Conditions that may be imposed include designated times of operation, the ratio of staff to patrons and a limit on group size. When the bylaw was last reviewed in 2016, the requirement for permission for organised licensed premises tours received a fair amount of attention.
31. Largely due to COVID-19, there has been minimal activity in this space in recent years. However, with visitor numbers quickly rebounding in Queenstown, it is anticipated that this will again become a popular activity.

### Requiring registration for busking in public places

32. Currently prospective buskers (as well as pop-up stalls and charity street collectors) are required to register via an application form on Council's website. If the applicant does not meet the conditions for undertaking their activity in a public place, they are required to apply for a permit. It is not proposed to change this system in principle. This is because a shift to a full permit system would not address the perceived issues with busking, related to crowding and arguably detrimental effects to the visitor experience on the Queenstown lakefront. Whether via registration or permit, the enforcement options under the bylaw are similar.
33. To address the concerns raised in the preliminary feedback regarding the Queenstown lakefront, it is proposed to review the permitted sites for busking that the bylaw applies to, with a view to ensuring that they are located a reasonable distance from areas particularly sensitive to disruption or noise from busking activity. The bylaw does not apply to reserves land, which is governed by the Reserves Act 1977.

### **Options analysis**

34. Council has the ability to make changes to the draft bylaw as an outcome of formal consultation in response to feedback received, as long as the changes are within the scope of the statement of proposal. Material changes to the draft bylaw proposed after consultation that are not contemplated in the statement of proposal may require Council to consult again.
35. This report identifies and assesses the following reasonably practicable options for assessing the matter as required by section 77 of the Local Government Act 2002.
36. **Option 1:** that Council endorses the draft Activities in Public Places Bylaw 2023 for consultation following the Special Consultative Procedure. Note that it is open to the Council to recommend changes to the draft bylaw as part of this option.

<i>Advantages</i>	<i>Disadvantages</i>
<ul style="list-style-type: none"> <li>Continues a compliant bylaw review process in a timely fashion.</li> <li>Council retains the ability to regulate busking, trading, events, the consumption of mind-altering substances, the distribution of leaflets and licenced premises tours in public places.</li> <li>Council would have the ability to regulate commercial micromobility rental schemes (e-scooter hire) in public places.</li> </ul>	<ul style="list-style-type: none"> <li>There are time and costs associated with consultation and implementation.</li> </ul>

37. **Option 2:** that Council does not endorse the draft Activities in Public Places Bylaw 2023 for consultation following the Special Consultative Procedure.

<i>Advantages</i>	<i>Disadvantages</i>
<ul style="list-style-type: none"> <li>There would be reduced time and costs associated with consultation and implementation of the bylaw.</li> </ul>	<ul style="list-style-type: none"> <li>The bylaw review process would not be continued and the bylaw would lapse.</li> <li>Council would lose the ability to regulate busking, trading in public places, events, the consumption of mind-altering substances in public places, the distribution of leaflets and licenced premises tours.</li> <li>Council would not have the ability to regulate commercial micromobility rental schemes (e-scooter hire) in public places.</li> </ul>

38. This report recommends **Option 1** for addressing the matter, as this option regulates activities in public places in the district, whilst balancing individual rights and freedoms.

### Next steps

39. If endorsed by Council at its 23 March 2023 meeting, the draft bylaw and statement of proposal will go out for public consultation from 8am 3 April 2023 to 5pm 5 May 2023.

40. It is intended that the written submissions received will be presented and a hearing on this matter for those that would like to present their submission orally will take place in June 2023.

41. Staff would then present the draft bylaw to Council for deliberation and adoption at its 18 August 2023 meeting, to come into effect from September 2023.

### Consultation Process | Hātepe Matapaki

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#### Significance and Engagement | Te Whakamahi I kā Whakaaro Hiraka

42. This matter is of low significance, as determined by reference to the [Council's Significance and Engagement Policy](#) because:

- the matters have minimal to moderate impact on the community
- the proposal will not change the level of services provided by Council, or Council's capacity
- there is a low level of financial consequence as a result of adopting the recommended option.

43. During the later stages of reviewing this bylaw, such as when the decision is made to adopt the final bylaw, the degree of importance of this matter may reach the threshold of being a significant decision.

44. The persons who are affected by or interested in this matter are residents/ratepayers of the Queenstown Lakes District community, businesses that may wish to or currently do operate in or close to public places (ie. event organisers, licenced premises tour operators, licenced premises along Queenstown lakefront), and visitors to the district.

45. Officers have sought early feedback from stakeholders and the community on this bylaw. If Council endorses the draft bylaw and adopts the statement of proposal for public consultation, the public will be formally consulted using the Special Consultative Procedure. This will enable Council to better understand community views.

#### Māori Consultation | Iwi Rūnaka

46. Input will be sought on the draft bylaw from Te Ao Marama and Aukaha through the formal consultation process. In order to continue to educate and socialise the use of te reo Māori the community, the title of the bylaw has been translated.

### Risk and Mitigations | Kā Raru Tūpono me kā Whakamaurutaka

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47. This matter relates to the Regulatory/Legal/Compliance risk category. It is associated with RISK00018 Damage to the Environment - noise pollution events and facilities and RISK00038 Lack of Alignment - strategies and policies within the [QLDC Risk Register](#). This risk has been assessed as having a low inherent risk rating.
48. The approval of the recommended option will support the Council by allowing it to retain the risk at its current level. This shall be achieved by review of this bylaw to ensure that they respond appropriately to the issues in the district regarding activities in public places.

### Financial Implications | Kā Riteka ā-Pūtea

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49. The costs associated with reviewing the bylaw including staff time and advertising will be met within current Council budgets. Costs include staff time and advertising.
50. Whether through an MOU or the draft Activities in Public Places Bylaw 2023, the enforcement of micromobility device conditions could require additional resourcing in addition to what is provided for in current Council budgets. The draft bylaw does not propose any other significant changes to Council operations that would require additional funding.

### Council Effects and Views | Kā Whakaaweawe me kā Tirohaka a te Kaunihera

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51. The following Council policies, strategies and bylaws were considered:

- the outcomes and principles of Vision Beyond 2050
- the QLDC Annual Plan
- the QLDC Ten Year Plan 2021-31
- QLDC Events Strategy
- Queenstown Town Centre Masterplan: A creative and innovative town centre
- The QLDC Disability Policy: safety of mobility device users
- QLDC Climate and Biodiversity Plan
- QLDC Destination Management Plan.

52. The recommended option is consistent with the principles set out in the named instruments.

53. Provision for bylaw review is included in the Ten Year Plan/Annual Plan.

### Legal Considerations and Statutory Responsibilities | Ka Ture Whaiwhakaaro me kā Takohaka Waeture

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54. Council is bound by the LGA when making or reviewing bylaws. The base determination, notification and consultation procedures set out under sections 155, 156 and 157 of the LGA, apply. Legal advice has been received in relation to the draft bylaw and statement of proposal.

### Special Consultative Procedure

55. It is proposed to consult on the draft bylaw using the Special Consultative Procedure outlined in sections 83 and 86 of the LGA. The Special Consultative Procedure requires that Council adopts a formal statement of proposal, has a consultation period of not less than one month, and allows people to present their views to Council in a manner that enables spoken interaction, such as by having a hearing.
56. It is proposed that Council will make the statement of proposal as widely available as is reasonably practicable (in accordance with section 83 of the LGA), and encourage people to give feedback, by:
- placing advertisements in local newspapers
  - promoting the consultation on Council's social media pages
  - having the statement of proposal accessible on Council's Let's Talk website.

### Revocation of the Activities in Public Places Bylaw 2016

57. Section 160A of the LGA automatically revokes any bylaw two years after the last date it was eligible for review. For the Activities in Public Places Bylaw 2016, section 158 required review before 29 September 2021. As this was not undertaken, revocation is scheduled to occur on 29 September 2023. Council cannot avoid the revocation of the current bylaw, although it may elect to revoke it early and make another new bylaw, subject to completing formal public consultation process.

### Determinations

58. Before making or reviewing a bylaw, Council must make the determinations required under section 155 of the LGA. Set out below is the assessment for each required determination.

#### Most appropriate way of addressing the perceived problem

59. Council must, before commencing the process for making a bylaw, determine whether a bylaw is the most appropriate way of addressing the perceived problem or issue.
60. The issues that the draft bylaw addresses relate to activities occurring in public places, including trading, busking, events, the consumption of mind-altering substances, the distribution of leaflets and licenced premises tours. Officers consider that a bylaw to address these issues is the most appropriate option, given the assessment of the issues and options in the Analysis and Advice section of the report. Alternative measures such as engagement and education may be appropriate in conjunction with the bylaw, that enables Council to take enforcement action if indicated.

#### Most appropriate form of bylaw

61. Council is also required to determine whether the proposed bylaw is the most appropriate form of bylaw before it makes its decision. Officers consider that the draft bylaw is the most appropriate form of bylaw.
62. The draft Activities in Public Places Bylaw 2023 enables Council to regulate the commercial hire of micromobility devices. Permission conditions may be added through a policy by resolution, when Council has more information as to issues that require regulation.

#### New Zealand Bill of Rights Act 1990

63. Council is required to determine whether the draft bylaw gives rise to any implications under the NZBORA, which grants certain civil and political rights to people in New Zealand Aotearoa. In accordance with section 5 of the NZBORA, 'the rights and freedoms contained in the Bill of Rights may be subject only to such reasonable limits prescribed by law as can be demonstrably justified in a free and democratic society'.
64. The draft Activities in Public Places Bylaw 2023 prohibits the use of mind-altering substances in public places. This ban does not unreasonably interfere with any of the rights in the NZBORA, as its purpose is to protect and promote public safety.
65. Officers consider that the proposed increase in the scope of the ban on the distribution of leaflets in the draft Activities in Public Places Bylaw 2023 does not unreasonably restrict freedom of expression in the NZBORA. The ban is restricted to leaflets that are in relation to a business or event. In addition, an explanatory clause has been added to the bylaw to clarify that the purpose of the provision relates to littering, not limiting freedom of expression.
66. The other issues covered in the bylaw permit certain activities to occur (events, licensed premises tours, busking, trading), provided that certain conditions are met to ensure that these activities do not cause a nuisance to other members of the community. Accordingly, officers view that they do not unreasonably interfere with any of the rights in the NZBORA.

### Local Government Act 2002 Purpose Provisions | Te Whakatureture 2002 o te Kāwanataka ā-Kiaka

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67. Section 10 of the Local Government Act 2002 states the purpose of local government is (a) to enable democratic local decision-making and action by, and on behalf of, communities; and (b) to promote the social, economic, environmental, and cultural well-being of communities in the present and for the future. The bylaw promotes the four wellbeings by protecting the public from nuisance and regulating trading in public places. As such, the recommendations in this report are appropriate and within the ambit of Section 10 of the Act and;
- can be implemented through current funding under the Ten Year Plan and Annual Plan;
  - is consistent with the Council's plans and policies; and
  - would not significantly alter the intended level of service provision for any significant activity undertaken by or on behalf of the Council or transfer the ownership or control of a strategic asset to or from the Council.

### Attachments | Kā Tāpirihaka

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A	Draft Activities in Public Places Bylaw 2023
B	Current Activities in Public Places Bylaw 2016
C	Statement of proposal

**From:** [REDACTED]  
**Sent:** Tue, 28 Feb 2023 12:23:50 +1300  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Council Papers - Bylaws

Hi [REDACTED]

[REDACTED]


I've reviewed the papers and the SOPs – I'm acting CE next week so will be doing the final agenda check too.

Has [REDACTED] or [REDACTED] reviewed the SOPs?

Ngā mihi,

[REDACTED]

---

<p>[REDACTED]   General Manager, Strategy and Policy  </p> <p>Kaiwhakahaere Matua Rautaki &amp; Kaupapa Here Queenstown Lakes District Council</p> <p>DD: [REDACTED]   P: +64 3 441 0499</p> <p>E: [REDACTED]</p>	
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## Activities in Public Places Bylaw 2016

Queenstown Lakes District Council

Date of making: 29 September 2016 [minor amendment made on 6 October 2016]

Commencement: 30 November 2016

This bylaw is adopted pursuant to the Local Government Act 2002 and Health Act 1956.

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## Part 1 – Preliminary

### 1 Title and Commencement

1.1 This bylaw is the Queenstown Lakes District Council Activities in Public Places Bylaw 2016.

1.2 This bylaw comes into force on 30 November 2016.

### 2 Area within which Bylaw applies

2.1 This bylaw applies to the Queenstown Lakes District.

### 3 Purpose

3.1 The purpose of this bylaw is to:

- (a) protect the public from nuisance;
- (b) minimise the potential for offensive behaviour in public places;
- (c) protect, promote and maintain public health and safety;
- (d) protect land under Council control from misuse, damage or loss; and
- (e) regulate trading in public places.

### 4 Bylaw to bind the Crown

4.1 Except as provided in section 153 of the Local Government Act 2002, the Crown is bound by the provisions of this bylaw.

### 5 Delegation

5.1 Any of the powers and functions of the Council set out in this bylaw may be delegated by it to its Chief Executive Officer and sub-delegated by the Chief Executive Officer to any other Officer of Council.

### 6 Interpretation

6.1 In this bylaw, unless the context otherwise requires, –

**Busker** means a person or persons who is or are busking.

**Busk** means to perform in a public place, including but not limited to the playing of an instrument, singing, dancing, juggling, mime,

puppetry, performance art, conjuring, acrobatics, recitation, undertaking artworks and performing other acts of theatrical or visual form.

**Busking** and **Busking performance** have a corresponding meaning.

**Council** means the Queenstown Lakes District Council.

**Enforcement officer** means a person appointed to be an enforcement officer or an environmental health officer by the Queenstown Lakes District Council.

**Event** means an organised, temporary activity that takes place on one or more days including a market, pop-up stall, parade, protest, wedding, private function (which is independent of premises), festival, concert, celebration, multi-venue sports event of a significant scale, fun run, marathon, duathlon or triathlon. For the purposes of this bylaw an indoor performance, indoor private function, tasting and sampling activity giveaway, sports practice or training is not an event.

**Event organiser** means a person who has responsibility or oversight of the management, operation or organisation of an event, and includes a person who is an owner, occupier or manager of an event.

**Licensed premises** has the meaning given in the Sale and Supply of Alcohol Act 2012.

**Licensed premises tour organiser** means a person who has responsibility or oversight of the management, operation or organisation of an organised licensed premises tour.

**Market** means a combination of trading activities at a common location, and includes an arts and craft market, farmers' market, and street market day.

**Mind altering substance** means a substance, whether synthetic or naturally occurring, which may alter consciousness, mood or emotions, or which might intoxicate. It includes psychoactive substances as defined in the Psychoactive Substances Act 2013 and what is commonly known as glue sniffing, but does not include:

- (a) medically prescribed substances ingested by the person for whom they were prescribed;
- (b) substances purchased from a pharmacy without a medical prescription;
- (c) alcohol as defined in the Sale and Supply of Alcohol Act 2012.

**Nuisance** has the same meaning as given in section 29 of the Health Act 1956 and includes a person, animal, activity or circumstance causing unreasonable interference with the peace, comfort or convenience of another person whether or not that person is in a public place.

**Organised licensed premises tour** means a tour of two or more licensed premises involving a group of persons, that is marketed or advertised to the public or a section of the public in any form. It does not include a privately organised tour of licensed premises that is not marketed or advertised to the public.

**Offence** means an offence under section 239 of the Local Government Act 2002.

**Permission** means an official approval granted by the Council under clause 13.1 of this Bylaw.

**Pop up stall** means a stand, stall, structure, vehicle, awning, table or temporary structure from which goods or services are offered for distribution or sale, and includes a temporary food outlet, or a temporary drinks outlet. It does not include any activity forming part of a market.

**Public place** means any place that is open to or is being used by the public, whether free or on payment of a charge, and whether any owner or occupier of the place is lawfully entitled to exclude or eject any person from it.

**Trading activity** means an activity undertaken by any person where goods or services are offered for sale or hire, whether for commercial or charitable purposes.

**Temporary drinks outlet** means a stall or vehicle, whether self propelled or not, from which drinks are offered or displayed for sale, or from which drinks may be ordered, and includes a coffee cart. It excludes a stall or vehicle that primarily offers goods and/or services other than drinks.

**Temporary food outlet** means a stall or vehicle, whether self propelled or not, from which food is offered or displayed for sale, or from which food may be ordered. It excludes a stall or vehicle that primarily offers goods and/or services other than food .

- 6.2 Any explanatory notes and attachments are for information purposes, do not form part of this Bylaw, and may be made, amended and revoked without any formality.
- 6.3 The Interpretation Act 1999 applies to this Bylaw.

## Part 2 – Specific Controls

### 7 Nuisances

7.1 A person must not use a public place to:

- (a) do anything to cause or allow a nuisance to occur.
- (b) wilfully obstruct, disturb or interfere with any other person in their use or enjoyment of that public place.
- (c) use any material or thing recklessly or in a manner which may intimidate, be dangerous, be injurious to or cause a nuisance to any person.
- (d) do anything to cause or allow damage to any property owned or controlled by the Council.

### 8 Consumption of mind altering substances

8.1 A person must not consume, inject or inhale any mind altering substance in a public place.

### 9 Distribution of leaflets and canvassing

9.1 A person must not in connection with a trading activity in a public place:

- (a) deposit leaflets, flyers or other promotional material on any vehicle.
- (b) distribute leaflets, flyers or other promotional material except within retail premises offering related goods or services for sale or hire provided the owner or occupier has given permission for the distribution to occur.
- (c) distribute samples unless the distribution of samples occurs within retail premises offering related goods or services for sale or hire provided the owner or occupier has given permission for the distribution to occur.
- (d) tout, solicit, canvass, entice, or accost any person.

### 10 Events in public places

10.1 An event organiser must not cause or allow an event to occur in a public place, without first obtaining permission from the Council under Part 3 of this bylaw, unless an enforcement officer is satisfied on reasonable grounds that the event organiser does not require permission because the event is:

- (a) of a small scale;

- (b) not open to the public or a section of the public; and
  - (c) is unlikely to cause a nuisance in a public place or risk to public health and safety.
- 10.2 A person must not undertake any trading activity (including a temporary food or temporary drinks outlet) in connection with an event held in a public place unless the event is authorised by permission granted under Part 3 of this bylaw, or the event does not require permission under clause 10.1.
- 10.3 If an enforcement officer has reasonable grounds to believe that an event organiser is not complying with clause 10.1, the enforcement officer may direct the event organiser to close down the event until permission is obtained under Part 3 of this bylaw.
- 10.4 If an enforcement officer has reasonable grounds to believe that permission has been breached, or the event is causing a nuisance in a public place, or it is necessary to protect public health and safety, the enforcement officer may:
- (a) direct that the event organiser comply with any relevant condition of the event permission or to take action to prevent the nuisance from continuing or to protect public health and safety;
  - (b) revoke the event permission if the event organiser does not comply with the enforcement officer's direction in (a), within a reasonable period of time; and
  - (c) issue a direction requiring the event organiser to close down the event if the permission is revoked under (b).
- 10.5 An event organiser must comply immediately with a direction from an enforcement officer under clause 10.3 or 10.4.
- 11 Organised licensed premises tours**
- 11.1 A licensed premises tour organiser must not cause or allow an organised licensed premises tour to occur in a public place, without first obtaining permission from the Council under Part 3 of this bylaw.
- 11.2 No person, agency, or business may sell tickets to, or otherwise promote an organised licensed premises tour that is to occur in a public place unless the tour is authorised by permission from the Council under Part 3 of this Bylaw.
- 11.3 If an enforcement officer has reasonable grounds to believe that a licensed premises tour organiser is not complying with clause 11.1, the enforcement officer may direct the licensed premises tour organiser to stop the organised licensed premises tour until permission is obtained under Part 3 of this bylaw.

- 11.4 If an enforcement officer has reasonable grounds to believe that an organised licensed premises tour permission has been breached in a public place, or the organised licensed premises tour is causing offensive behaviour or a nuisance in a public place, the enforcement officer may:
- (a) direct that the licensed premises tour organiser comply with any relevant condition of the organised licensed premises tour permission or to take action to prevent the offensive behaviour or nuisance from continuing;
  - (b) revoke the organised licensed premises tour permission if the licensed premises tour organiser does not comply with the enforcement officer's direction in (a), within a reasonable period of time; and
  - (c) issue a direction requiring the licensed premises tour organiser to stop the organised licensed premises tour if the permission is revoked under (b).
- 11.5 A licensed premises tour organiser must comply immediately with a direction from an enforcement officer under clause 11.3 or 11.4.

## 12 Busking

- 12.1 A person may busk in a public place provided all of the following conditions are met:
- (a) the busker has registered his or her details in the Council online busking register and agreed to comply with all busking conditions;
  - (b) the busker is at a distance of at least 50 metres from any other busker;
  - (c) the busker is at a distance of at least 3 metres from any residential, retail or commercial premises unless the busker has permission of the owner or occupier of the premises to busk at a closer distance;
  - (d) the busker does not obstruct pedestrian flow;
  - (e) the busker does not perform in the same location for longer than one hour, unless there is a 30 minute break between performances;
  - (f) the busker does not use an amplified sound system;
  - (g) the busker does not perform in a manner that in the reasonable opinion of a Council officer causes or is likely to cause an injury or nuisance to any person or damage to any property owned or controlled by the Council;

- (h) the busker does not at any time argue, intimidate, insult or abuse the public; and
  - (i) The busker does not perform within 200 metres of the area designated for an event authorised by Council.
- 12.2 A busker who cannot meet all of the conditions in clause 12.1 of this bylaw must not busk except as authorised by:
- (a) permission obtained prior to commencing a busking performance under Part 3 of this bylaw; or
  - (b) a resource consent issued by the Council.
- 12.3 If an enforcement officer has reasonable grounds to believe that a busker is not complying with the conditions in clause 12.1 above, or the conditions of a busking permission, or is causing offensive behaviour or a nuisance in a public place, the enforcement officer may direct that the busker:
- (a) comply with any relevant condition or to take action to prevent the offensive behaviour or nuisance from continuing; and
  - (b) if the busker does not comply with the enforcement officer's direction in (a) within a reasonable time, the enforcement officer may:
    - (i) revoke the busking permission;
    - (ii) direct the busker to cease the busking performance; and
    - (iii) direct that the busker move to a new location.
- 12.4 A busker must comply immediately with a direction from an enforcement officer under clause 12.3.

## Part 3– Permissions

### 13 Application for Council permission

- 13.1 The Council may grant permissions for an event, an organised licensed premises tour, or a busking performance.
- 13.2 When deciding whether to issue permission under this bylaw, the Council may have regard to:
- (a) whether the proposed activity may result in an undue restriction on vehicle traffic or pedestrian flow;
  - (b) whether the proposed activity may pose a risk to public health and safety;

- (c) whether the proposed activity may pose a risk to council property;
  - (d) whether the proposed location of the activity is appropriate given the nature and scale of the activity proposed;
  - (e) whether the proposed activity may cause a nuisance; and
  - (f) whether the proposed activity is consistent with any applicable Council policies and plans.
- 13.3 The Council may grant permission under this clause subject to the conditions for that proposed activity set out in this part of the bylaw.

#### **14 Conditions for event permission**

- 14.1 When granting an event permission, the Council may impose conditions, including, but not limited to:
- (a) the designated times of operation (hours and days) including limitations on the hours of set up and pack down;
  - (b) the duration of the permission;
  - (c) the location of the activity, taking into account the surrounding land uses and street layout and the minimum clear widths of footpaths required for pedestrian access;
  - (d) a requirement that the activity is not located in a public place in a way that it is likely to cause a nuisance, unreasonable obstruction or hazard to pedestrian and vehicle access;
  - (e) that a continuous accessible path of travel is provided for;
  - (f) requiring compliance with a traffic management plan and/or any waste management and minimisation plan;
  - (g) specifications on the use of any furniture, structures, equipment, vehicles and other items associated with the activity;
  - (h) safety, health and hygiene requirements;
  - (i) the requirement for public liability insurance;
  - (j) restrictions on the use of amplified music/sound; and
  - (k) requiring compliance with relevant Council policies and plans.
- 14.2 An event organiser must ensure that the event does not breach the conditions of the permission issued under clause 14.1.

14.3 An event organiser must ensure that written confirmation of permission is either displayed during the event or can be produced when requested to do so by an enforcement officer.

**15 Conditions for organised licensed premises tour permission**

15.1 When granting an organised licensed premises tour permission, the Council may impose conditions, including, but not limited to:

- (a) the designated times of operation (hours and days) for the organised licensed premises tour;
- (b) The ratio of staff involved in conducting tours to patrons;
- (c) the duration of permission;
- (d) a limit on group size for each organised licensed premises tour;
- (e) measures for dealing with intoxicated persons and persons involved in intimidatory or other offensive behaviour;
- (f) a requirement that the organised licensed premises tour is not conducted in a way that it is likely to cause a nuisance, unreasonable obstruction or hazard to pedestrian and vehicle access;
- (g) safety, health and hygiene requirements;
- (h) restrictions on the use of amplified music/sound;
- (i) requiring compliance with other Council bylaws including the Alcohol Ban Bylaw 2014 and any applicable Council policies and plans; and
- (j) requiring all staff members involved in conducting tours to:
  - (i) attend a host responsibility qualification or similar course or provide in-house training approved by an enforcement officer; and
  - (ii) attend crowd control training or provide in-house training approved by an enforcement officer.

15.2 A licensed premises tour organiser must ensure that the organised licensed premises tour does not breach the conditions of the permission granted under clause 15.1.

15.3 A licensed premises tour organiser must ensure that written confirmation of permission can be produced when requested to do so by an enforcement officer.

**16 Conditions for busking permission**

- 16.1 When granting a busking permission, the Council may impose conditions, including, but not limited to:
- (a) the minimum distance between the applicant and another busker;
  - (b) the minimum distance from other permitted events;
  - (c) the minimum distance from any retail premises;
  - (d) measures to mitigate obstructions to pedestrian flow;
  - (e) duration of busking performance and breaks between busking performances;
  - (f) the hours during which the performance can occur;
  - (g) the maximum volume of the busking performance;
  - (h) whether amplified sound can be used; and
  - (i) any other condition in the reasonable opinion of a Council officer is necessary to reduce the likelihood of the busking performance causing an injury or nuisance to any person.
- 16.2 A busker must ensure that the busking performance does not breach the conditions of the permission granted under clause 16.1.
- 16.3 A busker must ensure that written confirmation of permission can be produced when requested to do so by an enforcement officer.

**17 Request for review of original decision**

- 17.1 A person may request in writing for the Council to review its decision to:
- (a) decline an application for permission under this bylaw;
  - (b) impose certain conditions under this bylaw; or
  - (c) revoke permission under this bylaw.
- 17.2 The Council has a discretion to review the original decision, and to either:
- (a) confirm its original decision;
  - (b) amend the conditions in the permission; or
  - (c) issue a new permission.

**18 Fees**

18.1 The Council may by resolution prescribe fees for:

- (a) permission granted under Part 3 of this bylaw;
- (b) processing an application;
- (c) reviewing an existing permission or a decision to decline or revoke permission; and
- (d) inspecting trading activities for the period of the permission.

**Part 4 – Enforcement****19 Enforcement**

19.1 The Council may use its powers under the Local Government Act 2002 and Health Act 1956 to enforce this bylaw.

**20 Offences and Penalties**

20.1 Every person who contravenes this bylaw commits an offence.

20.2 Every person who commits an offence against this bylaw is liable to the penalty imposed under section 242 of the Local Government Act 2002.

**21 Revocations**

21.1 The Control of Activities and Obstructions in Public Places Bylaw 2010, including any amendments, is revoked.

*Explanatory Note:*

*The Queenstown Lakes District Council Activities in Public Places Bylaw 2016 was adopted pursuant to a resolution passed by the Queenstown Lakes District Council on 29 September 2016 pursuant to the Local Government Act 2002 and Health Act 1956.*

Mayor:

*Janessa van Uden*

Chief Executive Officer:

*[Signature]*



## 1 INTRODUCTION

The purpose of the Activities in Public Places Bylaw 2016 includes protecting the public from nuisance, and currently contains specific provisions including:

- a ban on the consumption of mind-altering substances in public places
- a ban on the distribution of leaflets in connection with a trading activity in a public place
- requiring permission for events in public places
- requiring permission for organised licensed premises tours in public places (commercial pub crawls)
- requiring registration for busking in public places.

There is a separate statement of proposal for the Alcohol Restrictions in Public Places Bylaw 2018, that is also being reviewed. That bylaw prohibits the possession and consumption of alcohol in specific public places, dates and times within Queenstown Lakes District.

The Activities in Public Places Bylaw 2016 has been in place since November 2016, is due for review and will expire if not reviewed prior to September 2023. Though the designation of the permissible locations for activities like busking, pop-up stalls and charity collection sit outside the bylaw, Council is reviewing and seeking feedback on these permitted sites, alongside the bylaw review.

This statement of proposal is prepared under sections 83 and 86 of the Local Government Act 2002 (LGA) and contains:

- a copy of the draft Activities in Public Places Bylaw 2023 (the 'draft bylaw')
- information about the proposed amendments, including Council's determinations under section 155 of the LGA
- the reasons for the proposed amendments
- how you can have your say
- timetable for consultation.

## 2 PROPOSED CHANGES

Council is proposing the following amendments in the draft bylaw:

- amending the definition of 'trading activity' so that it includes the commercial hire of micromobility devices in public places so that these devices may also be regulated via the bylaw. This includes dockless e-scooters, but in the future could also include e-bikes and other similar devices
- amendments that ensure trading activities are separately covered in the bylaw instead of just in connection with an event
- amending the current ban on the distribution of leaflets needing to be in connection with a trading activity in a public place. This will now capture leaflets and material handed out in a public place in relation to any commercial activity or business. In addition, there is an amendment to clarify that the primary purpose for this ban is to prevent litter
- providing that Council can, by resolution, specify certain public places or parts of public places where trading activities and busking are permitted

- minor changes to the bylaw definitions, and to clarify and to improve readability and align with other legislative changes
- September 2023 commencement date.

All proposed amendments are identified in the draft bylaw by way of tracked changed text (~~strike through~~ and underline) included in this statement of proposal at Attachment 1. Council proposes the new bylaw will come into effect in September 2023.

showing by way of tracked changed text, the amendments proposed

**APPENDIX 1** – Draft Activities in Public Places Bylaw 2023

**APPENDIX 2** – Current Activities in Public Places Bylaw 2016

(Appendices to be added to statement of proposal document when released for consultation.)

### 3 THE REASON FOR THE PROPOSAL

The key reasons for this proposal are to:

- address issues relating to activities occurring in public places, including trading, busking, events, the consumption of mind altering substances, the distribution of leaflets and licenced premises tours
- seek community views on the issues covered by the draft bylaw
- seek community views on the draft bylaw
- to encourage people to give feedback on the draft bylaw
- to let people know how they can give feedback.

The 23 March 2023 Council report contains more detailed information on these points:

<https://www.qldc.govt.nz/your-council/council-documents/agendas-minutes/full-council>.

### 4 HOW YOU CAN HAVE YOUR SAY

Anyone can make a submission online at <https://letstalk.qldc.govt.nz>. Submissions will be accepted from 8am on 3 April 2023 and must be received by 5pm on 5 May 2023.

All submissions should state:

- the submitter's name
- the submitter's contact details
- whether or not the submitter would like to speak to Council about this matter.

Copies of this statement of proposal and draft bylaw may be obtained at no cost from either of the Council offices at 10 Gorge Road, Queenstown, 47 Ardmore Street, Wānaka, any Council library within the Queenstown Lakes District or the Council website: at <https://letstalk.qldc.govt.nz>. If you need help submitting please contact Council at 03 441 0499, or call in to one of Council's offices. All written submissions made to Council will be acknowledged and made available to the public.

Council intends to hold a hearing in June 2023. This is when anyone who has made a written submission and who has said they would like to speak to Council, can do so. This meeting will be open to the public. If you indicate you would like to be heard, Council staff will get in touch with you to arrange a time for you to speak at the hearing either in person or via audiovisual link. If at the hearing you have any requirements, please let us know.

## 5 TIMETABLE FOR CONSULTATION

The dates below outline the timetable for the consultation process. Any changes to these dates will be publicly advised on Council’s Facebook page and website.

Date	Activity
23 March 2023	Council adopted the proposal for consultation
3 April 2023	Consultation period begins (8am)
5 May 2023	Consultation period ends (5pm)
June 2023	Oral submissions heard by Council hearing panel (date to be confirmed)
18 August 2023	Deliberations and adoption by Council

## 6 INFORMATION ABOUT THE PROPOSAL

### Background

Council has the power under the Local Government Act 2002 to make bylaws to protect the public from nuisance, protect, promote, and maintain public health and safety and minimise the potential for offensive behaviour in public places.

Council undertook preliminary engagement during November 2022 to gather information as to what stakeholders view as the main issues with the existing bylaw.

### Information about the draft bylaw

- Commercial hire of micromobility devices (e-scooters). The key change recommended in the draft bylaw is to add the commercial hire of micromobility devices in public places to the definition of ‘trading activity’ so these devices may also be regulated via the bylaw. This enables Council to regulate the hire and parking of micromobility devices on public land, by requiring permission from Council for this activity. Trading activities

are also being treated separately from events, and conditions and restrictions may be provided for in the bylaw or by Council resolution.

- Ban on the consumption of mind altering substances in public places. Police have advised that this ban is a useful tool for them with respect to butane/ solvent abuse in public places, primarily by itinerant individuals, as these are mind altering substances for which there is no directly applicable legislation to prevent offensive behaviour prior to the solvent abuse occurring. It is proposed to maintain the current provisions in the bylaw.
- Ban on the distribution of leaflets in connection with a trading activity in a public place. The current bylaw applies to leafletting in connection with a trading activity in a public place. The extent of this provision is not clear given leaflet distribution can be for businesses beyond those that trade in a public place. It is proposed to clarify and increase the scope of this provision, to address leaflets and material handed out in a public place in relation to any commercial activity or business. An explanatory clause has been added to the draft bylaw to clarify that the purpose of the ban is to address littering in relation to the distribution of leaflets and other material.
- Requiring permission for events in public places. It is proposed to maintain the provisions in the current bylaw for events in public places. Currently an event organiser is required to obtain permission from Council, and the bylaw enables Council to impose certain conditions on the event permission.
- Requiring permission for organised licensed premises tours in public places (pub crawls). The current bylaw provisions in relation to organised licensed premises tours are maintained in the draft bylaw. The bylaw requires that tour organisers need Council permission where a tour occurs in any public places. Conditions may be imposed, such as designated times of operation, the ratio of staff to patrons and a limit on group size.
- Requiring registration for busking in public places and review of permissible sites. The current bylaw requires prospective buskers (as well as pop up stalls and charity street collectors) to register via an application form on Council's website. If the applicant does not meet the busking conditions, they are required to apply for a permit. It is not proposed to change this system. To address concerns raised in the preliminary feedback regarding the Queenstown lakefront around perceived detrimental effects of busking due to noise and crowding, it is proposed to review the permitted sites for busking that the bylaw applies to, with a view to ensuring that they are located a reasonable distance from areas particularly sensitive to disruption or noise from busking activity. It is proposed to add a specific clause for Council to make resolutions to decide on permitted busking areas (and permitted trading areas). The bylaw does not apply to activities on reserves land, which is governed by the Reserves Act 1977.

As with the formal review, or making, of any bylaw, it is open to Council to consider other amendments that could be included in the bylaw.

During the consultation process, Council may consider community views that seek to:

- make changes to the issues that are regulated in the draft bylaw
- add additional issues that are regulated by the draft bylaw
- make additional changes to the draft bylaw
- not adopt a bylaw.

Before adopting the final bylaw, with any additional amendments, Council will consider whether there has been adequate consultation and, under section 155 of the LGA, must determine that a bylaw is the most appropriate way of addressing the perceived problems, that the proposed bylaw is in the most appropriate form, and that it does not give rise to any implications under the New Zealand Bill of Rights Act 1990. Council has also made these determinations in relation to the draft bylaw.

## 7 DETERMINATIONS UNDER SECTION 155 OF THE LGA

Council is empowered to make the bylaw in accordance with the Local Government Act 2002 which requires Council to make the following determinations.

**The draft bylaw is the most appropriate way of addressing the perceived problems** – The bylaw is an effective tool used by Council to regulate problems associated with trading, busking, events, the consumption of mind altering substances, the distribution of leaflets and licenced premises tours in public places. Council has resolved that a bylaw is the most appropriate way to address the problems associated with activities in public places.

**The draft bylaw is the most appropriate form of bylaw** - Council resolved that the draft bylaw is the most appropriate form of bylaw. The draft bylaw enables Council to regulate the commercial hire of micromobility devices. Permission conditions may be added through a policy by resolution, when Council has more information as to specific issues that require regulation that are consistent with Council's bylaw making powers.

**The draft bylaw does not give rise to any implications under the New Zealand Bill of Rights Act 1990** - The draft bylaw prohibits the use of mind altering substances in public places. As its purpose is to protect and promote public safety, this ban does not unreasonably interfere with any of the rights in the New Zealand Bill of Rights Act 1990. The proposed increase in the scope of the ban on the distribution of leaflets in the draft bylaw does not unreasonably restrict freedom of expression because it is restricted to leaflets that are in relation to a business or event. In addition, an explanatory clause has been added to the bylaw to clarify that the purpose of the provision relates to the littering, not limiting freedom of expression. The other issues covered in the draft bylaw permit certain activities to occur (events, licensed premises tours, busking, trading), provided that certain conditions are met to ensure that these activities do not cause a nuisance to other members of the community. Council has resolved that the provisions of the draft bylaw do not unreasonably interfere with any of the rights granted by the New Zealand Bill of Rights Act 1990.

## 8 WHAT HAPPENS NEXT?

After it has received written and oral submissions, Council will make decisions on the draft bylaw which is proposed to occur on 18 August 2023. Council may make other changes to the draft bylaw in response to feedback, but anything that is a significant departure from the options set out in this proposal may require further consultation.

Council will consider the following options about how to proceed:

- **Option 1** – adopt the draft bylaw
- **Option 2** – adopt an amended bylaw
- **Option 3** – do not adopt the draft bylaw (the current bylaw will expire in September 2023)





























**From:** [REDACTED]  
**Sent:** Fri, 2 May 2025 15:31:19 +1300  
**To:** [REDACTED]  
**Subject:** RE: Draft email to permit holders

Looks fab [REDACTED]!

Cheers,

[REDACTED]

---

<p>[REDACTED]</p> <p>Graduate Monitoring, Enforcement and Environmental Officer   Assurance, Finance and Risk Queenstown Lakes District Council DD: [REDACTED]   P: +64 3 441 0499 Email: [REDACTED]</p>	 <p>QUEENSTOWN LAKES DISTRICT COUNCIL</p>
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Please consider the environment before printing this e-mail


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**From:** [REDACTED]  
**Sent:** Friday, 2 May 2025 2:24 PM  
**To:** [REDACTED]  
**Subject:** RE: Draft email to permit holders

That reads great!

Regards,  
[REDACTED]

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<p>[REDACTED]</p> <p>Monitoring, Enforcement &amp; Environmental Team Leader   Assurance, Finance and Risk Queenstown Lakes District Council DD: [REDACTED]   P: +64 3 441 0499 E: [REDACTED]</p>	 <p>QUEENSTOWN LAKES DISTRICT COUNCIL</p>
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**From:** [REDACTED]  
**Sent:** Friday, 2 May 2025 2:00 PM  
**To:** [REDACTED]  
**Subject:** Draft email to permit holders

Hi [REDACTED] and [REDACTED],

Thank you for the draft for the updates to permit holders. I had a review and made some minor tweaks – please see below. Can you please review and let me know if you’re happy with this? The intention is to get this sent out on Monday all going well.

Thanks,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]  
Monitoring, Enforcement & Environmental Manager | Assurance,  
Finance and Risk

Queenstown Lakes District Council

DD: [REDACTED] | P: +64 3 441 0499

E: [REDACTED]



**From:** [REDACTED]  
**Sent:** Fri, 17 Feb 2023 08:41:59 +1300  
**To:** [REDACTED]  
**Subject:** RE: draft activities in public places report, SOP, bylaw

Have just switched to the new Council report template, so please look at this link for the report [new report template 23.2.23 alcohol bylaw.docx](#)

Thanks,

[REDACTED]

---

[REDACTED] | Senior Policy Advisor | Kaiārahi Matua  
Kaupapa Here  
Strategy and Policy  
DD: [REDACTED] | P: +64 3 441 0499  
E: [REDACTED]



---

**From:** [REDACTED]  
**Sent:** Friday, February 10, 2023 2:39 PM  
**To:** [REDACTED]  
**Subject:** draft activities in public places report, SOP, bylaw

Kia ora,

Links to the documents for the draft Activities in Public Places Bylaw 2023 to go to Council are below. This one's a bit more straightforward (at this point anyway), as compared to alcohol control.

[REDACTED] and [REDACTED], this is to keep you in the loop re: e scooters and events – happy for any feedback.

A few points to note/clarify:

- Highlighted dates are just to ensure that if these get shifted by comms, that I remember to update the dates throughout
- [REDACTED]
- [REDACTED], can we please discuss the permissible busking locations? From our discussions, I have included in the report and SOP that these are going to be reviewed. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Please feel free to circulate to other staff you think should review. If you could please let me know if you have any comments by **COB next Friday February 17**, that would be amazing. Happy to chat if easier.

Thanks,

[REDACTED]

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[REDACTED] | Senior Policy Advisor | Kaiārahi Matua  
Kaupapa Here  
Strategy and Policy  
DD: [REDACTED] | P: +64 3 441 0499  
E: [REDACTED]



**From:** [REDACTED]  
**Sent:** Thu, 16 Feb 2023 10:20:14 +1300  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** summary of next steps regarding permissible busking (and other trading) places

Mōrena [REDACTED] and [REDACTED],

This email summarises my understanding of where we got to yesterday regarding how to address a review of the places where busking (and other trading activities) are permissible in the bylaw. The starting point is that the feedback received both through the pre-engagement stage and informally indicates that there is concerns about busking along the Queenstown lakefront area (also some stall holders). This is primarily related to noise concerns and proximity to outdoor seating at licensed premises. As a response, we agreed in light of all the factors involved, officer view is that the current maps are appropriate, but that seeking feedback will help to inform this position.

The proposed approach includes:

- asking for feedback on the current places where busking (and pop up stalls and charity street collection) is permissible in the bylaw – support/don't support/no opinion (through the consultation survey).
- providing a snip of the map of current permissible areas (link to online map here [Permits - QLDC](#)).
- Make it clear reserve land is not covered by the bylaw
- Feedback will be analysed with a view as to whether there are any changes that should be recommended to Council. Wording (SOP) needs to ensure that there is no legitimate expectation that there will be changes as an outcome. Also needs to be clear (in report, possibly also SOP) that current officer view, with the information we have, is that the existing designated areas are appropriate.
- There has been no feedback on trading in Wānaka, so whilst comments on this will be welcome, consultation will not specifically ask about Wānaka locations.
- Have highlighted text in the draft [REDACTED], added info at page 7 of the [REDACTED] and page 4 of the [REDACTED]. Please let me know if I have provided sufficient information, especially in relation to the reserves land distinction.

Let me know if I've missed anything. [REDACTED]

Kind regards,  
[REDACTED]

[REDACTED] | Senior Policy Advisor | Kaiārahi Matua  
Kaupapa Here  
Strategy and Policy  
DD: [REDACTED] | P: +64 3 441 0499  
E: [REDACTED]

