

Appendix A - A copy of the Appellants' submission

NTT submission on the Proposed QLDC District Plan – Stage 1

Submission point	Plan Provision	Relief sought (amended wording sought shown in <u>underline</u> strikeout)
20	21.5.44.3	<p>Amend rule to allow the potential for recreational and commercial boating activities to occur on the Beansburn tributary of the Dart River. Suggested wording is follows:</p> <p><i>Any tributary of the Dart and Rees rivers (except the Rockburn <u>and Beansburn</u> tributaries y of the Dart River) or upstream of Muddy Creek on the Rees River.</i></p>
21	21.5.47.4	<p>Amend standard to reduce the number of commercial jet boat operators upstream of the confluence of the Beansburn from two to one. Suggested wording is as follows:</p> <p><i>Dart River – The total number of commercial motorised boating activities shall not exceed 26 trips in any one day. No more than two <u>one</u> commercial jet boat operators shall operate upstream of the confluence of the Beansburn, other than for tramper and angler access only.</i></p>

Submission on the Proposed Queenstown Lakes District Plan 2015 (Stage 1)

Pursuant to Clause 6 of Schedule 1, Resource Management Act 1991

To: Queenstown Lakes District Council

Address: Sent via email to: services@qldc.govt.nz

Name of submitter: Ngāi Tahu Tourism Ltd

About the submitter: Ngāi Tahu Tourism Ltd is a subsidiary of Ngāi Tahu Holdings Corporation Ltd.

Trade Competition: The submitter cannot gain an advantage in trade competition through this submission.

Submission and decisions sought: This submission by Ngāi Tahu Tourism focuses on the strategic direction and objectives and policies of the QLDC District Plan to ensure it appropriately recognises and provides for tourism activities in order to achieve sustainable management of the districts natural and physical resources. It also seeks rezoning of land in Arthurs Point (Morning Star Beach Area) to recognise and provide for established tourism activities carried out adjacent to the Shotover River.

The specific proposed district plan provisions this submission relates to, and the decisions sought, are as set out in the attached table.

Hearings: The submitter wishes to be heard in support of this submission.

Address for Service: Ngāi Tahu Tourism Ltd
C/- John Edmonds + Associates Ltd
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Phone: 03 450 0009

Date: 23rd October 2015

Reasons for the submission

Tourism is the districts major industry. The significant benefits of tourism activities that attract people to the district should be specifically recognised and provided for in the district plan.

Ngāi Tahu Tourism is seeking overarching amendments to the Proposed District Plan to ensure it recognises and provides for the protection and ongoing growth of tourism activities. In order to satisfactorily recognise and provide for tourism activity the following is considered necessary:

- Strong strategic objectives and supporting policies to recognise the importance of the tourism sectors and provide for tourism and supporting transport activities across the district. This is required to ensure the plan is framed in such a way that facilitates flow on amendments to all other chapters
- A definition of a tourism activity to differentiate tourism activities from other commercial activities. Ring fencing tourism activities should provide more certainty to all parties interested in the management of tourism activities in the district and enable the plan to be administered more efficiently and effectively overall.
- Recognition that privately owned and operated infrastructure may not meet the RMA definition of infrastructure or network utility and therefore these buildings and structures may not be afforded an appropriate level of provision under the RPS or the district plan. It is therefore important to ensure all buildings and structures which support tourism activities are included in the definition of Tourism Activity, or otherwise provided for in the district plan.
- Recognition that majority of the districts tourism activity relies on safe and efficient access to and the maintenance and enhancement of the district natural resources. It is important that existing transport and tourism infrastructure is protected from incompatible activities and development.
- Recognition that tourism activities, including ancillary services and buildings and structures, often have locational, technical, and operational constraints (practical constraints) which can prevent all adverse effects from being avoided, remedied or mitigated. In these scenarios, it may be appropriate for residual adverse effects to be offset or compensated.

The request to rezone the Morning Star Beach Area is considered appropriate given the existing Tourism activities in this area and the potential for some appropriate expansion in the future.

General relief is also sought to ensure QLDC has the scope to give effect to the intended relief sought, particularly if other unspecified relief is deemed by the submitter to be more appropriate having regard to matters raised in other submissions. Ngāi Tahu Tourism may want or need to be involved in potential amendments to provisions not specified in this submission. Generally, the effect of these other provisions are supported but many of the provisions could be reworded or deleted to improve their readability, avoid unnecessary duplication, and improve the overall effectiveness and administration of the district plan.

The above reasons provide a high level summary of why Ngāi Tahu Tourism is seeking amendments to the Proposed District Plan. For brevity and to avoid repetition reasons for each separate submission have not been provided. Ngāi Tahu Tourism reserves its right to expand on these reasons in due course

NTT submission on the Proposed QLDC District Plan – Stage 1

Submission point	Plan Provision	Relief sought (amended wording sought shown in <u>underline</u> strikeout)
1	All provisions	Alternative, amended, or such other relief deemed more consistent with or better able to give effect to these submissions or the provisions referred to by these submissions.
2	All provisions	That all provisions not amended in response to this submission be retained as notified unless it duplicates another provision in which case it should be deleted.
3	All provisions	Delete provisions where they duplicate or repeat other provisions.
4	Definitions Tourism Activity (new)	Insert new definition for “Tourism Activity”. Suggested wording is as follows: <u>Tourism Activity:</u> <u>Means the use or development of a resource for the purpose of attracting visitors to the district, and includes associated buildings, structures, infrastructure, transport activities, and administration activities.</u>
5	New Strategic Goal	If Goals are to be retained, then insert new strategic goal relating specifically to tourism. Suggested wording is as follows: <u>The ongoing growth of and support for tourism activities.</u>
6	New Strategic Objective	Insert new strategic objective: <u>To recognise and provide for the significant socioeconomic benefits of tourism activities across the District.</u>
7	New Strategic Policy	Insert new strategic policy: <u>To provide for the significant socioeconomic benefits of tourism activities across the district by:</u> (i) <u>Maintaining and enhancing the districts natural character</u> (ii) <u>Protecting existing transport routes and access to key visitor attractions from incompatible uses and development of land and water</u> (iii) <u>Protecting existing buildings , structures and informal airports that support tourism activities from incompatible land use or development</u> (iv) <u>Enabling the use and development of natural and physical resources for tourism activity where adverse effects are avoided, remedied, or mitigated</u> (v) <u>Providing for the use and development of natural and physical resources for tourism activity where residual adverse effects can be appropriately offset or compensated</u> (vi) <u>Providing for activities and development which support tourism activities.</u>

Submission point	Plan Provision	Relief sought (amended wording sought shown in <u>underline</u> strikeout)
8	All Rules in the plan	Amend rules as required to ensure: <ul style="list-style-type: none"> (i) tourism activities outside or not affected by a value protected by s6 of the RMA are enabled via the permitted, controlled, or restricted discretionary activity status; (ii) tourism activities within or affected by a value protected by section 6 of the RMA are provided for as a restricted discretionary or discretionary activity; (iii) tourism activities are not classified as a non-complying or prohibited activity.
9	Policy 3.2.1.1.3	Amend policy so that it applies across the district, not just in the Queenstown and Wanaka central business areas. <i>Promote growth in the visitor industry and encourage investment in lifting the scope and quality of attractions, facilities and services <u>across the district</u> within the Queenstown and Wanaka central business areas.</i>
10	Policy 3.2.1.3.1	Amend policy as follows: <i>Provide for <u>Enable</u> a wide variety of activities and sufficient capacity within commercially zoned land to accommodate business growth and diversification.</i>
11	Objective 3.2.1.4	Amend objective as follows: <i>Recognise <u>Enable</u> the potential for rural areas to diversify their land use beyond the strong productive value of farming, provided a sensitive approach is taken to rural amenity, landscape character, healthy ecosystems, and Ngai Tahu values, rights and interests.</i>
12	Objective 3.2.3.2	Amend objective as follows: <i>Protect the District's cultural heritage values <u>from inappropriate activities</u> and ensure development is sympathetic to them.</i>
13	Policies 3.2.3.2.1	Amend policy as follows: <i>Identify heritage items and, <u>in consultation with landowners and tenants</u>, ensure they are protected from inappropriate development.</i>
14	Objective 3.2.4.5	Amend objective as follows: <i><u>Maintain</u> Preserve or enhance the natural character of the beds and margins of the District's lakes, rivers and wetlands.</i>
15	Objective 3.2.5.1	Amend objective as follows: <i>Protect the natural character of Outstanding Natural Landscapes and Outstanding Natural Features from <u>inappropriate</u> subdivision, use and development.</i>
16	Policies 3.2.5.1.1	Amend policy as follows: <i>Identify the district's Outstanding Natural Landscapes and Outstanding Natural Features on the District Plan maps, and protect <u>manage</u> them from the adverse effects of subdivision and development.</i>

Submission point	Plan Provision	Relief sought (amended wording sought shown in <u>underline</u> strikeout)
17	Objective 3.2.5.2	Amend objective as follows: Minimise <u>Manage</u> the adverse landscape effects of subdivision, use or development in specified Rural Landscapes.
18	Policy 3.2.5.5.2	Amend policy as follows: Recognise that the retention of the character of rural areas is often dependent on the ongoing viability of <u>land use farming</u> and that evolving forms of agricultural <u>land use</u> , which may change the landscape <u>character</u> , are anticipated.
19	Plan Zoning	Rezone land legally described as SEC 1 SO 23662 SEC 4 SO 23901, PT SEC 3 SO 23901 BLK XIX SHOTOVER SD - MORNING STAR BEACH RECREATION RESERVE, SEC 133 BLK XIX SHOTOVER SD, LOTS 1-2 DP 25724, and the adjoining road reserve/marginal strip from "Rural General" to "Rural Visitor" or "Visitor". The location of this land is illustrated below (more or less). 