

Appendix 2 – A copy of Remarkables Park Limited's and Queenstown Park Limited's further submissions

**FURTHER SUBMISSION ON PROPOSED QUEENSTOWN LAKES DISTRICT PLAN:
STAGE 3**

Clause 8 of Schedule 1, Resource Management Act 1991

To: Queenstown Lakes District Council

Submitter Details:

Name of Further Submitter: Remarkables Park Limited (**RPL** or the **Submitter**)

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1. This is a further submission on Stage 3 of the Proposed Queenstown Lakes District Plan. This submission relates to the following chapter of the PDP: **Chapter 39 Wāhi Tūpuna.**

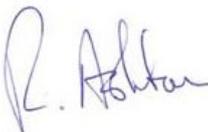
Trade Competition

2. The Submitter could not gain an advantage in trade competition through this submission.

Remarkables Park Limited further submission is that:

3. RPL has an interest greater than the public generally. RPL is a development company that is the land developer of 150 ha of land zoned Remarkables Park Zone (**RPZ**) which provides for a town centre and mixed-use urban development in Queenstown.
4. The attached table (**Attachment A**) is organised by submitter number and records the submissions that RPL supports/or opposes together with the reasons for each further submission
5. The Submitter wishes to be heard in support of their submission.
6. If others make a similar submission the Submitter will consider presenting a joint case with them at a hearing.

Signature


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John Young / Rowan Ashton
Counsel for Remarkables Park Ltd

Date 18 February 2020

Attachment A

Sub # / Point	Sub #	Name	Topic	Provision	Summary	RPL's position (Support or oppose)	In whole or in part	Reasons
OS3020.12	3020	Yvonne Aubrey	Wahi Tupuna	2-39 Wahi Tupuna, 2.7.7- Variation to Chapter 25 - Earthworks	That the 10 m ³ earthworks volume threshold for the Wāhi Tūpuna areas be reviewed and replaced with a more workable volume threshold.	Support	In whole	The maximum earthwork volume specified in Rule 25.5.2 will capture very minor earthwork activities that will necessitate a potentially lengthy and costly resource consent process. The maximum earthworks volume in Wāhi Tūpuna sites should be increased.
OS3021.1	3021	Leigh carppe	Wahi Tupuna	2-39 Wahi Tupuna	That the mapping of Wahi Tupuna in the District Plan is rejected.	Support	In whole	For the reasons set out in RPL's primary submission, RPL, supports the view the mapping be rejected. The Wāhi Tūpuna overlay should be redrawn so that it covers discrete sites of cultural significance.
OS3062.1	3062	John Bell	Wahi Tupuna	39.2 Objectives and Policies	That objective 39.2.1 be amended as follows: The values held by Manawhenua, Forest and Bird and the Federated Mountain Clubs Inc. within Wāhi Tūpuna and additional areas identified by these organisations are recognised and provided for, and considered as part of decision-making. And any consequential changes be made to any relevant policy.	Oppose	In whole	The purpose of Chapter 39 is to provide for the "kaitiātanga of Kai Tahu as Manawhenua in the district" (39.1). Values held by Forest and Bird and the Federated Mountain Clubs Inc. are not within the scope of this chapter.
OS3062.2	3062	John Bell	Wahi Tupuna	39.2 Objectives and Policies	That the same role and status as is proposed for Ngai Tahu with regard to Wāhi Tūpuna areas and others similarly identified be extended to two responsible and respected community organisations as requiring equal protection according to cultural and environmental values.	Oppose	In whole	The reasons are the same as the reasons provided for submission point OS3062.1.
OS3069.5	3069	Michael W Clark	Wahi Tupuna	39.2 Objectives and Policies	That Policy 39.2.1.2.f. is supported as notified.	Oppose	In whole	Policy 39.2.1.2 is unclear and excessively broad.

Sub # / Point	Sub #	Name	Topic	Provision	Summary	RPL's position (Support or oppose)	In whole or in part	Reasons
								Schedule 39.6 sufficiently address 'recognised threats' and Policy 39.2.1.2 is not required.
OS3073.3	3073.3	Lloyd James Veint	Wahi Tupuna	39.2 Objectives and Policies	That Policy 39.2.1.2 be amended so that is it not so broadly defined.	Support	In Part	Policy 39.2.1.2 is unclear and excessively broad. In the event that Policy 39.2.1.2 is not deleted, RPL supports reducing its scope.
OS3073.6	3073.3	Lloyd James Veint	Wahi Tupuna	39.2 Objectives and Policies	That Policy 39.2.1.7 be deleted or amended to make it more specific.	Support	In Part	RPL supports deleting Policy 39.2.1.7. Policy 39.2.1.7 creates unnecessary uncertainty and cost for developers regarding notification of resource consent applications, creates an unreasonable burden on developers and an administrative burden on Kai Tahu.
OS3080.4	3080	Transpower New Zealand Limited	Wahi Tupuna	39.2 Objectives and Policies	That Policy 39.2.1.2 is retained as notified.	Oppose	In Whole	Policy 39.2.1.2 is unclear and excessively broad. Schedule 39.6 sufficiently address 'recognised threats' and Policy 39.2.1.2 is not required.
OS3142.6	3142	Sustainable Glenorchy	Wahi Tupuna	Chapter 39, Wāhi Tūpuna	We support consulting with both iwi (Otago and Southland) but believe this should not trigger a resource consent application with the Council if there previously was no requirement for a resource consent	Support	In Part	Consultation with Iwi should only be required where there is an adequate resource management justification, which is absent in the proposed plan change.
OS3168.4	3168	N Gutzewitz & J Boyd	Wahi Tupuna	Chapter 39, Wāhi Tūpuna	That the mapping of Wāhi Tūpuna #24 be rejected, with any consequential changes.	Support	In part	RPL is concerned that even minor activities within the mapped Wāhi Tūpuna #24 Kawarau River will involve a lengthy and costly resource consent process. QLDC has provided insufficient evidence and assessment of how Wāhi Tūpuna #24 Kawarau River was identified and mapped.

Sub # / Point	Sub #	Name	Topic	Provision	Summary	RPL's position (Support or oppose)	In whole or in part	Reasons
								The mapping will have greater utility if, after consultation, the mapping is refined to specific sites of significance which can be supported by robust evidence and assessment.
OS3182.1	3182	Scope Resources Ltd	Wahi Tupuna	Chapter 39, Wāhi Tūpuna	That the mapping of Wāhi Tūpuna #36 be rejected, with any consequential changes.	Support	In part	RPL is concerned that even minor activities within the mapped Wāhi Tūpuna #36 Kawarau (Remarkables) will involve a lengthy and costly resource consent process. QLDC has provided insufficient evidence and assessment of how Wāhi Tūpuna #36 Kawarau (Remarkables) was identified and mapped.
OS3182.2	3182	Scope Resources Ltd	Wahi Tupuna	Chapter 39, Wāhi Tūpuna	That parts of Lots 1-4 DP 392270 be removed from Wāhi Tūpuna #36 to exclude the 'dip' south and the approved residential building platform located on Lot 4 DP 392270, with any subsequent changes.			The mapping will have greater utility if, after consultation, the mapping is refined to specific sites of significance which can be supported by robust evidence and assessment.
OS3182.3	3182	Scope Resources Ltd	Wahi Tupuna	2-39 Wahi Tupuna, 2.7.7- Variation to Chapter 25 - Earthworks	That the permitted volume for earthworks within a Wāhi Tūpuna zoned Rural is 1000m ³ (Table 25.2), with any consequential changes.	Support	In part	The maximum earthwork volume specified in Rule 25.5.2 will capture very minor earthwork activities that will necessitate a potentially lengthy and costly resource consent process. The maximum earthworks volume in Wāhi Tūpuna sites should be increased.
OS3183.2	3183	The Station at Waitiri & Waitipu Ltd	Wahi Tupuna	Chapter 39, Wāhi Tūpuna	That a cultural impact assessment be completed by QLDC to identify the cultural values of Manawhenua	Support	In part	RPL is concerned that even minor activities within the mapped Wāhi Tūpuna

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					within more clearly mapped Wāhi Tūpuna areas with reference to any items of cultural significance, with any consequential changes. Alternatively, that the boundaries of Wāhi Tūpuna be set 20m from the Cardrona River (Wāhi Tūpuna #24) and Kawarau River (Wāhi Tūpuna #24), with any consequential changes.			#24 Kawarau River will involve a lengthy and costly resource consent process. QLDC has provided insufficient evidence and assessment of how Wāhi Tūpuna #24 Kawarau River was identified and mapped. The mapping will have greater utility if, after consultation, the mapping is refined to specific sites of significance which can be supported by robust evidence and assessment.
OS3183.5	3183	The Station at Waitiri & Waitipu Ltd	Wahi Tupuna	Chapter 39, Wāhi Tūpuna	That the mapping of Wāhi Tūpuna #24 be rejected, with any consequential changes.	Support	In part	RPL is concerned that even minor activities within the mapped Wāhi Tūpuna #24 Kawarau River will involve a lengthy and costly resource consent process. QLDC has provided insufficient evidence and assessment of how Wāhi Tūpuna #24 Kawarau River was identified and mapped. The mapping will have greater utility if, after consultation, the mapping is refined to specific sites of significance which can be supported by robust evidence and assessment.
OS3197.31	3197	The D L Kenton Family Trust	Wahi Tupuna	2-39 Wahi Tupuna	That Policy 39.2.1.6 be amended so that it limits the activities that Manawhenua can be consulted on to comment on activities/effects that are a recognised threat only	Support	In part	As notified, Policy 39.2.1.6 is overly broad. RPL supports limiting the activities that Manawhenua can be consulted on. Consultation with Iwi should only be required where there is an adequate resource management justification, which is absent in the proposed plan change.

Sub # / Point	Sub #	Name	Topic	Provision	Summary	RPL's position (Support or oppose)	In whole or in part	Reasons
OS3198.1	3198	Al Angus	Wahi Tupuna	2-39 Wahi Tupuna	That the Wahi Tupuna chapter including mapping and all associated variation be rejected in its entirety.	Support	In part	For the reasons outlined in RPL's primary submission, RPL opposes Chapter 39 as notified.
OS3208.3	3280	Minaret Station Ltd	Wahi Tupuna	39.6 Schedule of Wahi Tupuna	That the mapping of Wāhi Tūpuna includes meaningful direction to landowners and Council as to the extent of the Wāhi tūpuna areas and the associated values and threats, with any consequential changes.	Support	Support in part	Support to the extent that the mapping of Wāhi Tūpuna should be removed except where specific sites of significance are identified. Wāhi Tūpuna The mapping will have greater utility if, after consultation, the mapping is refined to specific sites of significance which can be supported by robust evidence and assessment.
OS3208.4	3280	Minaret Station Ltd	Wahi Tupuna	39.6 Schedule of Wahi Tupuna	That the mapping and scheduling of values and recognised threats be supported by a clear methodology and an appropriate level of detail, with any consequential changes.	Support	In whole	Support for the reasons set out in RPL's primary submissions.
OS3213.1	3213	Contact Energy	Wahi Tupuna	Chapter 39, Wāhi Tūpuna	That Chapter 39 is retained as notified.	Oppose	In whole	RPL supports the intent of Chapter 39, however is concerned that Chapter 39 as drafted will cause unnecessary costs, delays and uncertainty and is not supported by adequate section 32 analysis. RPL therefore generally opposes Chapter 39 as currently drafted.
OS3213.2	3213	Contact Energy	Wahi Tupuna	Chapter 39, Wāhi Tūpuna	That Policy 39.2.1.5 is supported	Oppose	In whole	RPL considers that Policy 39.2.1.5 should be amended as set out in its primary submission.
OS3213.3	3213	Contact Energy	Wahi Tupuna	Chapter 39, Wāhi Tūpuna	That Policy 39.2.1.6 is supported	Oppose	In whole	RPL considers that Policy 39.2.1.6 should be amended as set out in its primary submission.
OS3214.1	3214	Scott L'Oste-Brown	Wahi Tupuna	2-39 Wahi Tupuna	That the intent of the Wahi Tupuna provisions be retained as notified.	Support	In whole.	RPL supports the intent of Chapter 39 to implement the strategic direction set out in Chapter 5 of the PDP and to provide for the kaitiakitanga of Kāi Tahu as Mana

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								Whenua in the Queenstown District. As a significant stakeholder in the District, however, the Submitter has concerns regarding the content and application of parts of Chapter 39.
OS3230.3	3230	Eco Sustainability Development Ltd	Wahi Tupuna	39.6 Schedule of Wahi Tupuna	That the spatial extent of the Wāhi Tūpuna mapping is redefined following a robust and comprehensive Section 32 analysis.	Support	In part	Support for the reasons set out in RPL's primary submission. In addition, further consultation should take place with both the community and potentially affected parties.
OS3281.10	3281	Mount Cardrona Station Limited	Earthworks	2.7.7 Variation to Chapter 25 - Earthworks	That the earthworks volume within Wāhi Tūpuna areas be increased.	Support	In whole	The maximum earthwork volume specified in Rule 25.5.2 will capture very minor earthwork activities that will necessitate a potentially lengthy and costly resource consent process. The maximum earthworks volume in Wāhi Tūpuna sites should be increased.
OS3287.22	3287	Hawea Community Association Inc	Earthworks	2.7.7 Variation to Chapter 25 - Earthworks	That more workable provisions be applied in regard to earthworks activities located within wāhi tūpuna areas.	Support	In whole	The proposed variation to Chapter 25 should be reviewed so that the provisions are more workable and not overly restrictive. The maximum earthwork volume specified in Rule 25.5.2 will capture very minor earthwork activities that will necessitate a potentially lengthy and costly resource consent process.
OS3291.1	3291	Federated Farmers of New Zealand	Wahi Tupuna	Chapter 39, Wāhi Tūpuna	That the Wāhi Tūpuna provisions be re-drafted to capture threats to the cultural landscape, whilst providing a suite of exclusions that would better align with the intent of s32(1)(a) & (b).	Support	In whole	RPL generally opposes Chapter 39 as notified and supports the submission that further definition, regarding threats to cultural values, should be included in Chapter 39. RPL supports the view that further exclusions could be included in Chapter 39 so that minor activities, that are unlikely to have effects on cultural values, are exempt.

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								RPL supports capturing the threats to cultural landscapes, however RPL agrees that the provision of a suite of exceptions would better align with s31(1)(a) & (b). As drafted, Chapter 39 introduces a more stringent rules framework that would require developers to seek resource consent for very minor and low impact activities.
OS3291.2	3291	Federated Farmers of New Zealand	Wahi Tupuna	Chapter 39, Wāhi Tūpuna	That the Wāhi Tūpuna overlay is redrawn to incorporate discrete locations rather than expansive areas which includes established farms.	Support	In whole	For the reasons set out in RPL's primary submission, RPL, supports the view that the Wāhi Tūpuna Overlay should be redrawn so that it covers discrete sites of cultural significance. The mapping will have greater utility if, after consultation, the mapping is refined to specific sites of significance which can be supported by robust evidence and assessment.
OS3291.8	3291	Federated Farmers of New Zealand	Wahi Tupuna	2.7.7- Variation to Chapter 25 Earthworks	That the earthworks provisions in the Wāhi Tūpuna chapter be rejected and earthworks is managed through the underlying zone provisions.	Support	In part	The maximum earthwork volume specified in Rule 25.5.2 will capture very minor earthwork activities that will necessitate a potentially lengthy and costly resource consent process. The maximum earthworks volume in Wāhi Tūpuna sites should be increased or removed.
OS3291.9	3291	Federated Farmers of New Zealand	Wahi Tupuna	39.6 Schedule of Wahi Tupuna	That objectives and policies to identify and protect significant sites are supported where these relate to specific defined areas, as outlined in the submission.	Support	In part	Many proposed Objectives and Policies also apply to sites not included in Schedule 39.6 and not identified as being of significance to Mana Whenua. As notified, the objectives and policies are overly broad and restrictive and are not supported by adequate section 32 assessment.

Sub # / Point	Sub #	Name	Topic	Provision	Summary	RPL's position (Support or oppose)	In whole or in part	Reasons
								RPL seeks the removal or amendment of these objectives and policies as set out in its primary submissions.
OS3304.1	3304	Tim Burdon	Wāhi tūpuna	39.6 Schedule of Wāhi tūpuna	That mapping of Wahi Tupuna areas need to accurately match the specific sites of cultural significance with clear explanations of their specific values.	Support	In whole	RPL supports this submission due to the reasons set out in its primary submission.
OS3306.5	3306	Kingston Village Ltd	Wahi Tupuna	Objective 39.2.1	That Policy 39.2.1.4 be rejected, or greater clarity be provided within the policy as to which activities are inappropriate (as reflected by the prohibited activity status).	Support	In Whole	The identification of the "certain activities" will provide greater certainty.
OS3306.6	3306	Kingston Village Ltd	Wāhi tūpuna	Objective 39.2.1.7	That Policy 39.2.1.7 be rejected.	Support	In whole	<p>Policy 29.2.1.7 is opposed and should be deleted in its entirety.</p> <p>Section 95E is a statutory test considered on a case by case basis having regard to the effects of an activity on a person. This policy has the potential to confuse the statutory test and a council officer may notify the application due to the activity rather than the effects of the activity. This creates unnecessary uncertainty and costs for developers regarding the notification of resource consent applications</p>
OS3306.7	3306	Kingston Village Ltd	Wāhi tūpuna	Objective 39.2.1.7	That Policy 39.2.1.7 be included as an 'interpretation note' or a notification guidance parameter at the end of the chapter.	Oppose	In whole	<p>Policy 29.2.1.7 is opposed and should be deleted in its entirety.</p> <p>Section 95E is a statutory test considered on a case by case basis having regard to the effects of an activity on a person. This policy has the potential to confuse the statutory test and a council officer may notify the application due to the activity rather than the effects of the activity. This creates unnecessary</p>

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								uncertainty and costs for developers regarding the notification of resource consent applications
OS3310.14	3310	Glenorchy Trustee Limited	Wahi Tupuna	39.6 Schedule of Wahi Tupuna	That the Wāhi Tūpuna mapping be refined to where there is ground truthed evidence of values to mana whenua.	Support	In whole	<p>The Council has not determined or verified whether the sites of value actually exist. For example, it appears that the Council has not undertaken any site visits;</p> <p>RPL opposes the mapping of substantial areas, and specifically, seeks removal of the Wahi Tupuna mapping of #24 Kawarau River and #36 Kawarau (Remarkables).</p> <p>In the alternative, Wahi Tupuna mapping should be redrawn so that it only applies to discreet sites of cultural significance which can be supported by evidence.</p>
OS3323.3	3323	Closeburn Station Management	Wahi Tupuna	39.6 Schedule of Wahi Tupuna	That the mapping of Wāhi Tūpuna be refined through ground truthed evidence of values to Manawhenua, with any consequential changes.	Support	In whole	It is unclear what evidence and what evaluation criteria, if any, the Council has relied on in its mapping and scheduling. The Council should identify the values and sites that they are seeking to protect rather than simply applying the overlay to vast areas of the District.
OS3323.6	3323	Closeburn Station Management	Wahi Tupuna	39.2 Objectives and Policies	That Policy 39.2.1.2 be amended to be more specific and certain.	Support	In part	The purpose of proposed Policy 39.2.1.2 is unclear. Essentially, every kind of activity could fit within the activities listed in Policy 39.2.1.2 (a) to (j).
OS3323.7	3323	Closeburn Station Management	Wahi Tupuna	39.2 Objectives and Policies	That Policy 39.2.1.3 be reviewed and amended to be more specific and certain.	Support	In Whole	It is unclear what Policy 39.2.1.3 is intended to refer to by its reference to "wāhi tūpuna areas."

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OS3323.9	3323	Closeburn Station Management	Wahi Tupuna	39.2 Objectives and Policies	That policy 39.2.1.7 be rejected.	Support	In Whole	RPL supports the deletion of Policy 39.2.1.7. Policy 39.2.1.7 creates unnecessary uncertainty and cost for developers regarding notification of resource consent applications, creates an unreasonable burden on developers and an administrative burden on Kai Tahu. Policy 39.2.1.7 should be deleted.
OS3332.2	3332	Barnhill Trust Limited	Wahi Tupuna	2-39 Wahi Tupuna	That, in the alternative to submission point 3332.1, the Wāhi Tūpuna #28 Haehaenui - Arrow River and Wāhi Tūpuna #24 Kawarau River be removed from the submitter's property on Morven Ferry Road, Arrow Junction.	Support	In part	RPL is concerned that even minor activities within the mapped Wāhi Tūpuna #24 Kawarau River will involve a lengthy and costly resource consent process. QLDC has provided insufficient evidence and assessment of how Wāhi Tūpuna #24 Kawarau River was identified and mapped. The mapping will have greater utility if, after consultation, the mapping is refined to specific sites of significance which can be supported by robust evidence and assessment.
OS3333.2	3333	DE Bunn & Co as representative of the Bunn Family	Wahi Tupuna	2-39 Wahi Tupuna	That, in the alternative to submission point 3333.1, the Wāhi Tūpuna #28 Haehaenui - Arrow River and Wāhi Tūpuna #24 Kawarau River be removed from the submitter's property between the Kawarau River, Arrow River, and Morven Ferry Road.	Support	In part	RPL is concerned that even minor activities within the mapped Wāhi Tūpuna #24 Kawarau River will involve a lengthy and costly resource consent process. QLDC has provided insufficient evidence and assessment of how Wāhi Tūpuna #24 Kawarau River was identified and mapped. The mapping will have greater utility if, after consultation, the mapping is refined to specific sites of significance which can

Sub # / Point	Sub #	Name	Topic	Provision	Summary	RPL's position (Support or oppose)	In whole or in part	Reasons
								be supported by robust evidence and assessment.
OS3342.32	3342	Otago Regional Council	Wahi Tupuna	39.2 Objectives and Policies	That Objective 39.2.1 be retained as notified.	Oppose	In Whole	As notified, Objective 39.2.1 also applies to 'unscheduled' areas. Objective 39.2.1 should apply to only identified wāhi tūpuna sites. Amend as set out in RPL's original submission.
OS3342.38	3342	Otago Regional Council	Wahi Tupuna	39.2 Objectives and Policies	That Policy 39.2.1.3 be amended to read as follows: Avoid, remedy, or mitigate any non-significant adverse effects on the identified wāhi tūpuna areas.	Support	In part	Policy 39.2.1.3 refers to "wāhi tūpuna areas." It is unclear to what this is intended to refer to. The policy should refer to identified wāhi tūpuna sites
OS3342.43	3342	Otago Regional Council	Wahi Tupuna	39.2 Objectives and Policies	That Policy 39.2.1.6 be retained as notified.	Oppose	In Whole	As notified, RPL opposes Policy 39.2.1.6 and supports its deletion. Policy 39.2.1.6 is overly broad and appears to require a cultural impact assessment even where the area is not scheduled or mapped as being of cultural significance. It is not the best policy to manage cultural effects.
OS3342.44	3342	Otago Regional Council	Wahi Tupuna	39.2 Objectives and Policies	That Policy 39.2.1.7 be retained as notified.	Oppose	In Whole	RPL opposes Policy 39.2.1.7 and supports its deletion. Policy 39.2.1.7 creates unnecessary uncertainty and cost for developers regarding notification of resource consent applications, creates an unreasonable burden on developers and an administrative burden on Kai Tahu.
OS3346.1	3346	Tomanovich Investments Limited	Wahi Tupuna	2-39 Wahi Tupuna	That Chapter 39, it's related mapping overlay and its associated variations are rejected in their current form; in the alternative the provisions be modified by removing Wāhi Tūpuna #24 from the property Sec 1-3 SO 24038 Blk V Kawarau	Support	In part	RPL is concerned that even minor activities within the mapped Wāhi Tūpuna #24 Kawarau River will involve a lengthy and costly resource consent process. QLDC has provided insufficient evidence and assessment of how Wāhi Tūpuna

Sub # / Point	Sub #	Name	Topic	Provision	Summary	RPL's position (Support or oppose)	In whole or in part	Reasons
					SD, on the southern side of Kawarau River accessed off Rafter Road off Gibbston Valley Highway with the boundary moved to meet with the marginal reserve of the Kawarau River.			#24 Kawarau River was identified and mapped. The mapping will have greater utility if, after consultation, the mapping is refined to specific sites of significance which can be supported by robust evidence and assessment.
OS3346.2	3346	Tomanovich Investments Limited	Wahi Tupuna	2-39 Wahi Tupuna	That the Council undertake further work to identify more concisely those values and sites that they are seeking to protect, the interrelationship with zoned and developed land, and re-notify a more informed proposal.	Support	In whole	It is unclear what evidence and what evaluation criteria, if any, the Council has relied on in its mapping and scheduling. The Council should identify the values and sites that they are seeking to protect rather than simply applying the overlay to vast areas of the District;
OS3350.1	3350	Gibbston Valley Station Limited	Wahi Tupuna	2-39 Wahi Tupuna	That Chapter 39, it's related mapping overlay and its associated variations are rejected in their current form; in the alternative, the provisions be modified by removing Wāhi Tūpuna #24 from the submitter's property known as Gibbston Valley Station on the southern side of the Gibbston Highway, accessed from Resta Road, with the boundary realigning along the Kawarau River to match the marginal strip.	Support	In part	RPL is concerned that even minor activities within the mapped Wāhi Tūpuna #24 Kawarau River will involve a lengthy and costly resource consent process. QLDC has provided insufficient evidence and assessment of how Wāhi Tūpuna #24 Kawarau River was identified and mapped. The mapping will have greater utility if, after consultation, the mapping is refined to specific sites of significance which can be supported by robust evidence and assessment.
OS3351.1	3351	The Station at Waitiri Limited	Wahi Tupuna	2-39 Wahi Tupuna	That Chapter 39, it's related mapping overlay and its associated variations are rejected in their current form; in the alternative, the provisions be modified by removing Wāhi Tūpuna #24 from the submitters property along Gibbston	Support	In part	RPL is concerned that even minor activities within the mapped Wāhi Tūpuna #24 Kawarau River will involve a lengthy and costly resource consent process. QLDC has provided insufficient evidence and assessment of how Wāhi Tūpuna

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					Valley Highway, being Section 3 SO 24743 and Lot 4 DP 27395, located on the southern side of the Kawarau River.			#24 Kawarau River was identified and mapped. The mapping will have greater utility if, after consultation, the mapping is refined to specific sites of significance which can be supported by robust evidence and assessment.
OS3362.1	3362	Glenorchy Community Association	Wāhi tūpuna	Variation to Chapter 25 - Earthworks	That a larger earthworks volume threshold be provided for under proposed Rule 25.5.2 or exemptions be provided for areas such as Glenorchy that are already modified.	Support	In Whole	The maximum earthworks volume specified in Rule 25.5.2 will capture very minor earthwork activities that will necessitate a potentially lengthy and costly resource consent process. The maximum earthworks volume in wāhi tūpuna sites should be increased.
OS3364.6	3364	100WPS Ltd	Wahi Tupuna	39.2 Objectives and Policies	That Policy 39.2.1.6 be rejected.	Support	In part	As presently drafted, Policy 39.2.1.6 is overly broad. It appears to require a cultural impact assessment even where the area is not scheduled or mapped as being of cultural significance. It is not the best policy to manage cultural effects.
OS3364.7	3364	100WPS Ltd	Wahi Tupuna	39.2 Objectives and Policies	That Policy 39.2.1.7 be rejected.	Support	In Whole	Policy 39.2.1.7 creates unnecessary uncertainty and cost for developers regarding notification of resource consent applications, creates an unreasonable burden on developers and an administrative burden on Kai Tahu. The policy should be deleted.
OS3365.1	3365	Con Tech Building Limited	Wahi Tupuna	39.2 Objectives and Policies	That Objective 39.2.1 be rejected.	Support	In Whole	As notified, RPL supports Objective 39.2.1 being rejected for the reasons set out in its primary submission.
OS3365.2	3365	Con Tech Building Limited	Wahi Tupuna	39.2 Objectives and Policies	That Policy 39.2.1.1 be rejected.	Support	In Whole	As notified, RPL supports Policy 39.2.1.1 being rejected.

Sub # / Point	Sub #	Name	Topic	Provision	Summary	RPL's position (Support or oppose)	In whole or in part	Reasons
								Policy 39.2.1.1 also applies to 'unscheduled' areas. Policy 39.2.1.1 should apply exclusively to identified wāhi tūpuna sites.
OS3365.3	3365	Con Tech Building Limited	Wahi Tupuna	39.2 Objectives and Policies	That Policy 39.2.1.2 be rejected.	Support	In Whole	RPL supports Policy 39.2.1.2 being rejected. As notified, the purpose of Policy 39.2.1.2 is unclear and overly broad. Essentially, every kind of activity could fit within the activities listed in Policy 39.2.1.2 (a) to (j).
OS3365.4	3365	Con Tech Building Limited	Wahi Tupuna	39.2 Objectives and Policies	That Policy 39.2.1.3 be rejected.	Support	In Whole	As notified, RPL supports Policy 39.2.1.3 being rejected for the reasons outlined in its primary submission.
OS3365.5	3365	Con Tech Building Limited	Wahi Tupuna	39.2 Objectives and Policies	That Policy 39.2.1.4 be rejected.	Support	In Whole	As notified, RPL supports Policy 39.2.1.4 being rejected for the reasons outlined in its primary submission.
OS3365.6	3365	Con Tech Building Limited	Wahi Tupuna	39.2 Objectives and Policies	That Policy 39.2.1.6 be rejected.	Support	In Whole	As notified, RPL supports Policy 39.2.1.6 being rejected for the reasons outlined in its primary submission.
OS3365.7	3365	Con Tech Building Limited	Wahi Tupuna	39.2 Objectives and Policies	That Policy 39.2.1.7 be rejected.	Support	In Whole	As notified, RPL supports Policy 39.2.1.7 being rejected for the reasons outlined in its primary submission.
OS3365.12	3365	Con Tech Building Limited	Wahi Tupuna	39.2 Objectives and Policies	That the Rule - Standard 25.5.2 be rejected.	Support	In Whole	The maximum earthwork volume specified in Rule 25.5.2 will capture very minor earthwork activities that will necessitate a potentially lengthy and costly resource consent process. The maximum earthworks volume in wāhi tūpuna areas should be increased.
OS3365.13	3365	Con Tech Building Limited	Wahi Tupuna	39.2 Objectives and Policies	That the Rule - Standard 25.5.7 be rejected.	Support	In Whole	RPL supports the rejection of Standard 25.5.7. As notified, the maximum volume for roads is unduly restrictive, would require developers to seek a resource consent for minor activities and is not supported by an adequate s 32 assessment.

Sub # / Point	Sub #	Name	Topic	Provision	Summary	RPL's position (Support or oppose)	In whole or in part	Reasons
OS3365.14	3365	Con Tech Building Limited	Wahi Tupuna	39.2 Objectives and Policies	That Rule 27.5.12A be rejected.	Support	In Whole	RPL supports the rejection of Rule 27.5.12A for the reasons outlined in its primary submission.
OS3365.15	3365	Con Tech Building Limited	Wahi Tupuna	39.2 Objectives and Policies	That Chapter 39 Wahi Tupuna be rejected.	Support	In Whole	RPL supports the intent of Chapter 39, however is concerned that Chapter 39 as drafted will cause unnecessary costs, delays and uncertainty and is not supported by adequate section 32 analysis. RPL therefore generally opposes Chapter 39 as currently drafted.
OS3365.19	3365	Con Tech Building Limited	Wahi Tupuna	39.2 Objectives and Policies	That the intent of protecting and enhancing the ancestral connection and interests in the District through objectives and policies relating to subdivision, use and development within the wahi tupuna areas be retained.	Support	In Whole	RPL supports the intent of Chapter 39, however is concerned that Chapter 39 as drafted will cause unnecessary costs, delays and uncertainty and is not supported by adequate section 32 analysis. RPL therefore generally opposes Chapter 39 as currently drafted.
OS3383.2	3383	Z Energy Limited, BP Oil NZ Limited & Mobil Oil NZ Limited	Wāhi tūpuna	39.5 Rules - Standards	That the proposed amendments to Rule 25.4.5.1 be retained insofar as they delete the text " whether identified on the Planning Maps or not" and amend the rule as follows: 'that modify, damage or destroy a wahi tapu, wahi tupuna or other site of significance to Maori identified on the Planning Maps'.	Support	In part	RPL supports narrowing the application of Rule 25.4.5.1, Rule 25.4.5.1 should apply to identified wahi tupuna sites and sites of significance to Maori identified on the planning maps.
OS3383.3	3383	Z Energy Limited, BP Oil NZ Limited & Mobil Oil NZ Limited	Wahi Tupuna	39.5 Rules - Standards	That Rules -Standards 39.5.1 be amended so that they clearly refer to Wāhi Tūpuna as identified on the Planning maps with amendments as suggested.	Support	In Whole	As drafted, Chapter 39 does not adequately distinguish between (mapped) Identified Wāhi Tūpuna Sites and (unmapped) Unidentified Wāhi Tupuna. Standards 39.5.1 should only apply to Identified Wāhi Tūpuna Sites.
OS3383.22	3383	Z Energy Limited, BP	Wahi Tupuna	39.5 Rules - Standards	That Rules -Standards 39.5.2 be amended so that they clearly refer	Support	In Whole	As drafted, Chapter 39 does not adequately distinguish between

Sub # / Point	Sub #	Name	Topic	Provision	Summary	RPL's position (Support or oppose)	In whole or in part	Reasons
		Oil NZ Limited & Mobil Oil NZ Limited			to Wāhi Tūpuna as identified on the Planning maps with amendments as suggested.			(mapped) Identified Wāhi Tūpuna Sites and (unmapped) Unidentified Wāhi Tupuna. Standards 39.5.2 should only apply to Identified Wāhi Tūpuna Sites.
OS3383.23	3383	Z Energy Limited, BP Oil NZ Limited & Mobil Oil NZ Limited	Wahi Tupuna	39.5 Rules - Standards	That Rules -Standards 39.5.3 be amended so that they clearly refer to Wāhi Tūpuna as identified on the Planning maps with amendments as suggested.	Support	In Whole	As drafted, Chapter 39 does not adequately distinguish between (mapped) Identified Wāhi Tūpuna Sites and (unmapped) Unidentified Wāhi Tupuna. Standards 39.5.3 should only apply to Identified Wāhi Tūpuna Sites.
OS3395.2	3395	R. Buckham	Wāhi tūpuna	2-39 Wāhi tūpuna	That the Council undertake further work to identify more concisely those values and sites that they are seeking to protect, the interrelationship with zoned and developed land, and re-notify a more informed proposal; alternatively, that the provisions be modified so as to meet the various concerns of the submitter as raised in its submission by removing the layer from its property, and to otherwise achieve the purpose of the Act.	Support		Support to the extent that the mapping of wāhi tūpuna should be removed except where specific sites of significance are identified. The mapping will have greater utility if, after consultation, the mapping is refined to specific sites of significance which can be supported by robust evidence and assessment.
OS3399.4	3399	Cattle Flat Station and Aspiring Helicopters Ltd	Wahi Tupuna	39.6 Schedule of Wahi Tupuna	That the mapping and scheduling of values and recognised threats be supported by a clear methodology and an appropriate level of detail.	Support	Support in part	QLDC has provided insufficient evidence and assessment of how Wāhi Tūpuna sites were identified and mapped. The mapping will have greater utility if, after consultation, the mapping is refined to specific sites of significance which can be supported by robust evidence and assessment.

**FURTHER SUBMISSION ON PROPOSED QUEENSTOWN LAKES DISTRICT PLAN:
STAGE 3****Clause 8 of Schedule 1, Resource Management Act 1991****To: Queenstown Lakes District Council****Submitter Details:**

Name of Further Submitter: Queenstown Park Limited (**QPL** or the **Submitter**)

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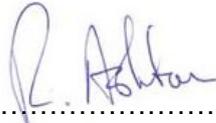
1. This is a further submission on Stage 3 of the Proposed Queenstown Lakes District Plan. This submission relates to the following chapter of the PDP: **Chapter 39 Wāhi Tūpuna.**

Trade Competition

2. The Submitter could not gain an advantage in trade competition through this submission.

Queenstown Park Limited further submission is that:

3. QPL has an interest greater than the public generally. QPL owns Queenstown Park (formerly known as Kawarau Station and Cone Peak Station). Queenstown Park is a 2,000ha site located on the true right bank of the Kawarau River, which extends to an altitude of approximately 1000masl. The land is zoned Rural General in the operative District Plan. Decisions on Stage 1 of the PDP zoned the land Rural, with some Outstanding Natural Landscape (ONL) classification. QPL has appealed this decision to the Environment Court.
4. The attached table (**Attachment A**) is organised by submitter number and records the submissions that QPL supports/or opposes together with the reasons for each further submission
5. The Submitter wishes to be heard in support of their submission.
6. If others make a similar submission the Submitter will consider presenting a joint case with them at a hearing.

Signature

.....
John Young / Rowan Ashton
Counsel for Queenstown Park Ltd

Date 18 February 2020

Attachment A

Sub # / Point	Sub #	Name	Topic	Provision	Summary	QPL's position (Support or oppose)	In whole or in part	Reasons
OS3020.12	3020	Yvonne Aubrey	Wahi Tupuna	2-39 Wahi Tupuna, 2.7.7- Variation to Chapter 25 - Earthworks	That the 10 m ³ earthworks volume threshold for the Wāhi Tūpuna areas be reviewed and replaced with a more workable volume threshold.	Support	In whole	The maximum earthwork volume specified in Rule 25.5.2 will capture very minor earthwork activities that will necessitate a potentially lengthy and costly resource consent process. The maximum earthworks volume in Wāhi Tūpuna sites should be increased.
OS3021.1	3021	Leigh carppe	Wahi Tupuna	2-39 Wahi Tupuna	That the mapping of Wahi Tupuna in the District Plan is rejected.	Support	In whole	For the reasons set out in QPL's primary submission, QPL, supports the view the mapping be rejected. The Wāhi Tūpuna overlay should be redrawn so that it covers discrete sites of cultural significance.
OS3062.1	3062	John Bell	Wahi Tupuna	39.2 Objectives and Policies	That objective 39.2.1 be amended as follows: The values held by Manawhenua, Forest and Bird and the Federated Mountain Clubs Inc. within Wāhi Tūpuna and additional areas identified by these organisations are recognised and provided for, and considered as part of decision-making. And any consequential changes be made to any relevant policy.	Oppose	In whole	The purpose of Chapter 39 is to provide for the "kaitianga of Kai Tahu as Manawhenua in the district" (39.1). Values held by Forest and Bird and the Federated Mountain Clubs Inc. are not within the scope of this chapter.
OS3062.2	3062	John Bell	Wahi Tupuna	39.2 Objectives and Policies	That the same role and status as is proposed for Ngai Tahu with regard to Wāhi Tūpuna areas and others similarly identified be extended to two responsible and respected community organisations as requiring equal protection according to cultural and environmental values.	Oppose	In whole	The reasons are the same as the reasons provided for submission point OS3062.1.
OS3069.5	3069	Michael W Clark	Wahi Tupuna	39.2 Objectives and Policies	That Policy 39.2.1.2.f. is supported as notified.	Oppose	In whole	Policy 39.2.1.2 is unclear and excessively broad.

Sub # / Point	Sub #	Name	Topic	Provision	Summary	QPL's position (Support or oppose)	In whole or in part	Reasons
								Schedule 39.6 sufficiently address 'recognised threats' and Policy 39.2.1.2 is not required.
OS3073.3	3073.3	Lloyd James Veint	Wahi Tupuna	39.2 Objectives and Policies	That Policy 39.2.1.2 be amended so that is it not so broadly defined.	Support	In Part	Policy 39.2.1.2 is unclear and excessively broad. In the event that Policy 39.2.1.2 is not deleted, QPL supports reducing its scope.
OS3073.6	3073.3	Lloyd James Veint	Wahi Tupuna	39.2 Objectives and Policies	That Policy 39.2.1.7 be deleted or amended to make it more specific.	Support	In Part	QPL supports deleting Policy 39.2.1.7. Policy 39.2.1.7 creates unnecessary uncertainty and cost for developers regarding notification of resource consent applications, creates an unreasonable burden on developers and an administrative burden on Kai Tahu.
OS3080.4	3080	Transpower New Zealand Limited	Wahi Tupuna	39.2 Objectives and Policies	That Policy 39.2.1.2 is retained as notified.	Oppose	In Whole	Policy 39.2.1.2 is unclear and excessively broad. Schedule 39.6 sufficiently address 'recognised threats' and Policy 39.2.1.2 is not required.
OS3142.6	3142	Sustainable Glenorchy	Wahi Tupuna	Chapter 39, Wāhi Tūpuna	We support consulting with both iwi (Otago and Southland) but believe this should not trigger a resource consent application with the Council if there previously was no requirement for a resource consent	Support	In Part	Consultation with Iwi should only be required where there is an adequate resource management justification, which is absent in the proposed plan change.
OS3168.4	3168	N Gutzewitz & J Boyd	Wahi Tupuna	Chapter 39, Wāhi Tūpuna	That the mapping of Wāhi Tūpuna #24 be rejected, with any consequential changes.	Support	In part	QPL is concerned that even minor activities within the mapped Wāhi Tūpuna #24 Kawarau River will involve a lengthy and costly resource consent process. QLDC has provided insufficient evidence and assessment of how Wāhi Tūpuna #24 Kawarau River was identified and mapped.

Sub # / Point	Sub #	Name	Topic	Provision	Summary	QPL's position (Support or oppose)	In whole or in part	Reasons
								The mapping will have greater utility if, after consultation, the mapping is refined to specific sites of significance which can be supported by robust evidence and assessment.
OS3182.1	3182	Scope Resources Ltd	Wahi Tupuna	Chapter 39, Wāhi Tūpuna	That the mapping of Wāhi Tūpuna #36 be rejected, with any consequential changes.	Support	In part	<p>QPL is concerned that even minor activities within the mapped Wāhi Tūpuna #36 Kawarau (Remarkables) will involve a lengthy and costly resource consent process.</p> <p>QLDC has provided insufficient evidence and assessment of how Wāhi Tūpuna #36 Kawarau (Remarkables) was identified and mapped.</p>
OS3182.2	3182	Scope Resources Ltd	Wahi Tupuna	Chapter 39, Wāhi Tūpuna	That parts of Lots 1-4 DP 392270 be removed from Wāhi Tūpuna #36 to exclude the 'dip' south and the approved residential building platform located on Lot 4 DP 392270, with any subsequent changes.			The mapping will have greater utility if, after consultation, the mapping is refined to specific sites of significance which can be supported by robust evidence and assessment.
OS3182.3	3182	Scope Resources Ltd	Wahi Tupuna	2-39 Wahi Tupuna, 2.7.7- Variation to Chapter 25 - Earthworks	That the permitted volume for earthworks within a Wāhi Tūpuna zoned Rural is 1000m ³ (Table 25.2), with any consequential changes.	Support	In part	The maximum earthwork volume specified in Rule 25.5.2 will capture very minor earthwork activities that will necessitate a potentially lengthy and costly resource consent process. The maximum earthworks volume in Wāhi Tūpuna sites should be increased.
OS3183.2	3183	The Station at Waitiri & Waitipu Ltd	Wahi Tupuna	Chapter 39, Wāhi Tūpuna	That a cultural impact assessment be completed by QLDC to identify the cultural values of Manawhenua	Support	In part	QPL is concerned that even minor activities within the mapped Wāhi Tūpuna

Sub # / Point	Sub #	Name	Topic	Provision	Summary	QPL's position (Support or oppose)	In whole or in part	Reasons
					within more clearly mapped Wāhi Tūpuna areas with reference to any items of cultural significance, with any consequential changes. Alternatively, that the boundaries of Wāhi Tūpuna be set 20m from the Cardrona River (Wāhi Tūpuna #24) and Kawarau River (Wāhi Tūpuna #24), with any consequential changes.			#24 Kawarau River will involve a lengthy and costly resource consent process. QLDC has provided insufficient evidence and assessment of how Wāhi Tūpuna #24 Kawarau River was identified and mapped. The mapping will have greater utility if, after consultation, the mapping is refined to specific sites of significance which can be supported by robust evidence and assessment.
OS3183.5	3183	The Station at Waitiri & Waitipu Ltd	Wahi Tupuna	Chapter 39, Wāhi Tūpuna	That the mapping of Wāhi Tūpuna #24 be rejected, with any consequential changes.	Support	In part	QPL is concerned that even minor activities within the mapped Wāhi Tūpuna #24 Kawarau River will involve a lengthy and costly resource consent process. QLDC has provided insufficient evidence and assessment of how Wāhi Tūpuna #24 Kawarau River was identified and mapped. The mapping will have greater utility if, after consultation, the mapping is refined to specific sites of significance which can be supported by robust evidence and assessment.
OS3197.31	3197	The D L Kenton Family Trust	Wahi Tupuna	2-39 Wahi Tupuna	That Policy 39.2.1.6 be amended so that it limits the activities that Manawhenua can be consulted on to comment on activities/effects that are a recognised threat only	Support	In part	As notified, Policy 39.2.1.6 is overly broad. QPL supports limiting the activities that Manawhenua can be consulted on. Consultation with Iwi should only be required where there is an adequate resource management justification, which is absent in the proposed plan change.

Sub # / Point	Sub #	Name	Topic	Provision	Summary	QPL's position (Support or oppose)	In whole or in part	Reasons
OS3198.1	3198	Al Angus	Wahi Tupuna	2-39 Wahi Tupuna	That the Wahi Tupuna chapter including mapping and all associated variation be rejected in its entirety.	Support	In part	For the reasons outlined in QPL's primary submission, QPL opposes Chapter 39 as notified.
OS3208.3	3280	Minaret Station Ltd	Wahi Tupuna	39.6 Schedule of Wahi Tupuna	That the mapping of Wāhi Tūpuna includes meaningful direction to landowners and Council as to the extent of the Wāhi tūpuna areas and the associated values and threats, with any consequential changes.	Support	Support in part	Support to the extent that the mapping of Wāhi Tūpuna should be removed except where specific sites of significance are identified. Wāhi Tūpuna The mapping will have greater utility if, after consultation, the mapping is refined to specific sites of significance which can be supported by robust evidence and assessment.
OS3208.4	3280	Minaret Station Ltd	Wahi Tupuna	39.6 Schedule of Wahi Tupuna	That the mapping and scheduling of values and recognised threats be supported by a clear methodology and an appropriate level of detail, with any consequential changes.	Support	In whole	Support for the reasons set out in QPL's primary submissions.
OS3213.1	3213	Contact Energy	Wahi Tupuna	Chapter 39, Wāhi Tūpuna	That Chapter 39 is retained as notified.	Oppose	In whole	QPL supports the intent of Chapter 39, however is concerned that Chapter 39 as drafted will cause unnecessary costs, delays and uncertainty and is not supported by adequate section 32 analysis. QPL therefore generally opposes Chapter 39 as currently drafted.
OS3213.2	3213	Contact Energy	Wahi Tupuna	Chapter 39, Wāhi Tūpuna	That Policy 39.2.1.5 is supported	Oppose	In whole	QPL considers that Policy 39.2.1.5 should be amended as set out in its primary submission.
OS3213.3	3213	Contact Energy	Wahi Tupuna	Chapter 39, Wāhi Tūpuna	That Policy 39.2.1.6 is supported	Oppose	In whole	QPL considers that Policy 39.2.1.6 should be amended as set out in its primary submission.
OS3214.1	3214	Scott L'Oste-Brown	Wahi Tupuna	2-39 Wahi Tupuna	That the intent of the Wahi Tupuna provisions be retained as notified.	Support	In whole.	QPL supports the intent of Chapter 39 to implement the strategic direction set out in Chapter 5 of the PDP and to provide for the kaitiakitanga of Kāi Tahu as Mana

Sub # / Point	Sub #	Name	Topic	Provision	Summary	QPL's position (Support or oppose)	In whole or in part	Reasons
								Whenua in the Queenstown District. As a significant stakeholder in the District, however, the Submitter has concerns regarding the content and application of parts of Chapter 39.
OS3230.3	3230	Eco Sustainability Development Ltd	Wahi Tupuna	39.6 Schedule of Wahi Tupuna	That the spatial extent of the Wāhi Tūpuna mapping is redefined following a robust and comprehensive Section 32 analysis.	Support	In part	Support for the reasons set out in QPL's primary submission. In addition, further consultation should take place with both the community and potentially affected parties.
OS3281.10	3281	Mount Cardrona Station Limited	Earthworks	2.7.7 Variation to Chapter 25 - Earthworks	That the earthworks volume within Wāhi Tūpuna areas be increased.	Support	In whole	The maximum earthwork volume specified in Rule 25.5.2 will capture very minor earthwork activities that will necessitate a potentially lengthy and costly resource consent process. The maximum earthworks volume in Wāhi Tūpuna sites should be increased.
OS3287.22	3287	Hawea Community Association Inc	Earthworks	2.7.7 Variation to Chapter 25 - Earthworks	That more workable provisions be applied in regard to earthworks activities located within wāhi tūpuna areas.	Support	In whole	The proposed variation to Chapter 25 should be reviewed so that the provisions are more workable and not overly restrictive. The maximum earthwork volume specified in Rule 25.5.2 will capture very minor earthwork activities that will necessitate a potentially lengthy and costly resource consent process.
OS3291.1	3291	Federated Farmers of New Zealand	Wahi Tupuna	Chapter 39, Wāhi Tūpuna	That the Wāhi Tūpuna provisions be re-drafted to capture threats to the cultural landscape, whilst providing a suite of exclusions that would better align with the intent of s32(1)(a) & (b).	Support	In whole	QPL generally opposes Chapter 39 as notified and supports the submission that further definition, regarding threats to cultural values, should be included in Chapter 39. QPL supports the view that further exclusions could be included in Chapter 39 so that minor activities, that are unlikely to have effects on cultural values, are exempt.

Sub # / Point	Sub #	Name	Topic	Provision	Summary	QPL's position (Support or oppose)	In whole or in part	Reasons
								QPL supports capturing the threats to cultural landscapes, however QPL agrees that the provision of a suite of exceptions would better align with s31(1)(a) & (b). As drafted, Chapter 39 introduces a more stringent rules framework that would require developers to seek resource consent for very minor and low impact activities.
OS3291.2	3291	Federated Farmers of New Zealand	Wahi Tupuna	Chapter 39, Wāhi Tūpuna	That the Wāhi Tūpuna overlay is redrawn to incorporate discrete locations rather than expansive areas which includes established farms.	Support	In whole	For the reasons set out in QPL's primary submission, QPL, supports the view that the Wāhi Tūpuna Overlay should be redrawn so that it covers discrete sites of cultural significance. The mapping will have greater utility if, after consultation, the mapping is refined to specific sites of significance which can be supported by robust evidence and assessment.
OS3291.8	3291	Federated Farmers of New Zealand	Wahi Tupuna	2.7.7- Variation to Chapter 25 Earthworks	That the earthworks provisions in the Wāhi Tūpuna chapter be rejected and earthworks is managed through the underlying zone provisions.	Support	In part	The maximum earthwork volume specified in Rule 25.5.2 will capture very minor earthwork activities that will necessitate a potentially lengthy and costly resource consent process. The maximum earthworks volume in Wāhi Tūpuna sites should be increased or removed.
OS3291.9	3291	Federated Farmers of New Zealand	Wahi Tupuna	39.6 Schedule of Wahi Tupuna	That objectives and policies to identify and protect significant sites are supported where these relate to specific defined areas, as outlined in the submission.	Support	In part	Many proposed Objectives and Policies also apply to sites not included in Schedule 39.6 and not identified as being of significance to Mana Whenua. As notified, the objectives and policies are overly broad and restrictive and are not supported by adequate section 32 assessment.

Sub # / Point	Sub #	Name	Topic	Provision	Summary	QPL's position (Support or oppose)	In whole or in part	Reasons
								QPL seeks the removal or amendment of these objectives and policies as set out in its primary submissions.
OS3304.1	3304	Tim Burdon	Wāhi tūpuna	39.6 Schedule of Wāhi tūpuna	That mapping of Wahi Tupuna areas need to accurately match the specific sites of cultural significance with clear explanations of their specific values.	Support	In whole	QPL supports this submission due to the reasons set out in its primary submission.
OS3306.5	3306	Kingston Village Ltd	Wahi Tupuna	Objective 39.2.1	That Policy 39.2.1.4 be rejected, or greater clarity be provided within the policy as to which activities are inappropriate (as reflected by the prohibited activity status).	Support	In Whole	The identification of the "certain activities" will provide greater certainty.
OS3306.6	3306	Kingston Village Ltd	Wāhi tūpuna	Objective 39.2.1.7	That Policy 39.2.1.7 be rejected.	Support	In whole	<p>Policy 29.2.1.7 is opposed and should be deleted in its entirety.</p> <p>Section 95E is a statutory test considered on a case by case basis having regard to the effects of an activity on a person. This policy has the potential to confuse the statutory test and a council officer may notify the application due to the activity rather than the effects of the activity. This creates unnecessary uncertainty and costs for developers regarding the notification of resource consent applications</p>
OS3306.7	3306	Kingston Village Ltd	Wāhi tūpuna	Objective 39.2.1.7	That Policy 39.2.1.7 be included as an 'interpretation note' or a notification guidance parameter at the end of the chapter.	Oppose	In whole	<p>Policy 29.2.1.7 is opposed and should be deleted in its entirety.</p> <p>Section 95E is a statutory test considered on a case by case basis having regard to the effects of an activity on a person. This policy has the potential to confuse the statutory test and a council officer may notify the application due to the activity rather than the effects of the activity. This creates unnecessary</p>

Sub # / Point	Sub #	Name	Topic	Provision	Summary	QPL's position (Support or oppose)	In whole or in part	Reasons
								uncertainty and costs for developers regarding the notification of resource consent applications
OS3310.14	3310	Glenorchy Trustee Limited	Wahi Tupuna	39.6 Schedule of Wahi Tupuna	That the Wāhi Tūpuna mapping be refined to where there is ground truthed evidence of values to mana whenua.	Support	In whole	<p>The Council has not determined or verified whether the sites of value actually exist. For example, it appears that the Council has not undertaken any site visits;</p> <p>QPL opposes the mapping of substantial areas, and specifically, seeks removal of the Wahi Tupuna mapping of #24 Kawarau River and #36 Kawarau (Remarkables).</p> <p>In the alternative, Wahi Tupuna mapping should be redrawn so that it only applies to discreet sites of cultural significance which can be supported by evidence.</p>
OS3323.3	3323	Closeburn Station Management	Wahi Tupuna	39.6 Schedule of Wahi Tupuna	That the mapping of Wāhi Tūpuna be refined through ground truthed evidence of values to Manawhenua, with any consequential changes.	Support	In whole	It is unclear what evidence and what evaluation criteria, if any, the Council has relied on in its mapping and scheduling. The Council should identify the values and sites that they are seeking to protect rather than simply applying the overlay to vast areas of the District.
OS3323.6	3323	Closeburn Station Management	Wahi Tupuna	39.2 Objectives and Policies	That Policy 39.2.1.2 be amended to be more specific and certain.	Support	In part	The purpose of proposed Policy 39.2.1.2 is unclear. Essentially, every kind of activity could fit within the activities listed in Policy 39.2.1.2 (a) to (j).
OS3323.7	3323	Closeburn Station Management	Wahi Tupuna	39.2 Objectives and Policies	That Policy 39.2.1.3 be reviewed and amended to be more specific and certain.	Support	In Whole	It is unclear what Policy 39.2.1.3 is intended to refer to by its reference to "wāhi tūpuna areas."

Sub # / Point	Sub #	Name	Topic	Provision	Summary	QPL's position (Support or oppose)	In whole or in part	Reasons
OS3323.9	3323	Closeburn Station Management	Wahi Tupuna	39.2 Objectives and Policies	That policy 39.2.1.7 be rejected.	Support	In Whole	QPL supports the deletion of Policy 39.2.1.7. Policy 39.2.1.7 creates unnecessary uncertainty and cost for developers regarding notification of resource consent applications, creates an unreasonable burden on developers and an administrative burden on Kai Tahu. Policy 39.2.1.7 should be deleted.
OS3332.2	3332	Barnhill Trust Limited	Wahi Tupuna	2-39 Wahi Tupuna	That, in the alternative to submission point 3332.1, the Wāhi Tūpuna #28 Haehaenui - Arrow River and Wāhi Tūpuna #24 Kawarau River be removed from the submitter's property on Morven Ferry Road, Arrow Junction.	Support	In part	QPL is concerned that even minor activities within the mapped Wāhi Tūpuna #24 Kawarau River will involve a lengthy and costly resource consent process. QLDC has provided insufficient evidence and assessment of how Wāhi Tūpuna #24 Kawarau River was identified and mapped. The mapping will have greater utility if, after consultation, the mapping is refined to specific sites of significance which can be supported by robust evidence and assessment.
OS3333.2	3333	DE Bunn & Co as representative of the Bunn Family	Wahi Tupuna	2-39 Wahi Tupuna	That, in the alternative to submission point 3333.1, the Wāhi Tūpuna #28 Haehaenui - Arrow River and Wāhi Tūpuna #24 Kawarau River be removed from the submitter's property between the Kawarau River, Arrow River, and Morven Ferry Road.	Support	In part	QPL is concerned that even minor activities within the mapped Wāhi Tūpuna #24 Kawarau River will involve a lengthy and costly resource consent process. QLDC has provided insufficient evidence and assessment of how Wāhi Tūpuna #24 Kawarau River was identified and mapped. The mapping will have greater utility if, after consultation, the mapping is refined to specific sites of significance which can

Sub # / Point	Sub #	Name	Topic	Provision	Summary	QPL's position (Support or oppose)	In whole or in part	Reasons
								be supported by robust evidence and assessment.
OS3342.32	3342	Otago Regional Council	Wahi Tupuna	39.2 Objectives and Policies	That Objective 39.2.1 be retained as notified.	Oppose	In Whole	As notified, Objective 39.2.1 also applies to 'unscheduled' areas. Objective 39.2.1 should apply to only identified wāhi tūpuna sites. Amend as set out in QPL's original submission.
OS3342.38	3342	Otago Regional Council	Wahi Tupuna	39.2 Objectives and Policies	That Policy 39.2.1.3 be amended to read as follows: Avoid, remedy, or mitigate any non-significant adverse effects on the identified wāhi tūpuna areas.	Support	In part	Policy 39.2.1.3 refers to "wāhi tūpuna areas." It is unclear to what this is intended to refer to. The policy should refer to identified wāhi tūpuna sites
OS3342.43	3342	Otago Regional Council	Wahi Tupuna	39.2 Objectives and Policies	That Policy 39.2.1.6 be retained as notified.	Oppose	In Whole	As notified, QPL opposes Policy 39.2.1.6 and supports its deletion. Policy 39.2.1.6 is overly broad and appears to require a cultural impact assessment even where the area is not scheduled or mapped as being of cultural significance. It is not the best policy to manage cultural effects.
OS3342.44	3342	Otago Regional Council	Wahi Tupuna	39.2 Objectives and Policies	That Policy 39.2.1.7 be retained as notified.	Oppose	In Whole	QPL opposes Policy 39.2.1.7 and supports its deletion. Policy 39.2.1.7 creates unnecessary uncertainty and cost for developers regarding notification of resource consent applications, creates an unreasonable burden on developers and an administrative burden on Kai Tahu.
OS3346.1	3346	Tomanovich Investments Limited	Wahi Tupuna	2-39 Wahi Tupuna	That Chapter 39, it's related mapping overlay and its associated variations are rejected in their current form; in the alternative the provisions be modified by removing Wāhi Tūpuna #24 from the property Sec 1-3 SO 24038 Blk V Kawarau	Support	In part	QPL is concerned that even minor activities within the mapped Wāhi Tūpuna #24 Kawarau River will involve a lengthy and costly resource consent process. QLDC has provided insufficient evidence and assessment of how Wāhi Tūpuna

Sub # / Point	Sub #	Name	Topic	Provision	Summary	QPL's position (Support or oppose)	In whole or in part	Reasons
					SD, on the southern side of Kawarau River accessed off Rafter Road off Gibbston Valley Highway with the boundary moved to meet with the marginal reserve of the Kawarau River.			#24 Kawarau River was identified and mapped. The mapping will have greater utility if, after consultation, the mapping is refined to specific sites of significance which can be supported by robust evidence and assessment.
OS3346.2	3346	Tomanovich Investments Limited	Wahi Tupuna	2-39 Wahi Tupuna	That the Council undertake further work to identify more concisely those values and sites that they are seeking to protect, the interrelationship with zoned and developed land, and re-notify a more informed proposal.	Support	In whole	It is unclear what evidence and what evaluation criteria, if any, the Council has relied on in its mapping and scheduling. The Council should identify the values and sites that they are seeking to protect rather than simply applying the overlay to vast areas of the District;
OS3350.1	3350	Gibbston Valley Station Limited	Wahi Tupuna	2-39 Wahi Tupuna	That Chapter 39, it's related mapping overlay and its associated variations are rejected in their current form; in the alternative, the provisions be modified by removing Wāhi Tūpuna #24 from the submitter's property known as Gibbston Valley Station on the southern side of the Gibbston Highway, accessed from Resta Road, with the boundary realigning along the Kawarau River to match the marginal strip.	Support	In part	QPL is concerned that even minor activities within the mapped Wāhi Tūpuna #24 Kawarau River will involve a lengthy and costly resource consent process. QLDC has provided insufficient evidence and assessment of how Wāhi Tūpuna #24 Kawarau River was identified and mapped. The mapping will have greater utility if, after consultation, the mapping is refined to specific sites of significance which can be supported by robust evidence and assessment.
OS3351.1	3351	The Station at Waitiri Limited	Wahi Tupuna	2-39 Wahi Tupuna	That Chapter 39, it's related mapping overlay and its associated variations are rejected in their current form; in the alternative, the provisions be modified by removing Wāhi Tūpuna #24 from the submitters property along Gibbston	Support	In part	QPL is concerned that even minor activities within the mapped Wāhi Tūpuna #24 Kawarau River will involve a lengthy and costly resource consent process. QLDC has provided insufficient evidence and assessment of how Wāhi Tūpuna

Sub # / Point	Sub #	Name	Topic	Provision	Summary	QPL's position (Support or oppose)	In whole or in part	Reasons
					Valley Highway, being Section 3 SO 24743 and Lot 4 DP 27395, located on the southern side of the Kawarau River.			#24 Kawarau River was identified and mapped. The mapping will have greater utility if, after consultation, the mapping is refined to specific sites of significance which can be supported by robust evidence and assessment.
OS3362.1	3362	Glenorchy Community Association	Wāhi tūpuna	Variation to Chapter 25 - Earthworks	That a larger earthworks volume threshold be provided for under proposed Rule 25.5.2 or exemptions be provided for areas such as Glenorchy that are already modified.	Support	In Whole	The maximum earthworks volume specified in Rule 25.5.2 will capture very minor earthwork activities that will necessitate a potentially lengthy and costly resource consent process. The maximum earthworks volume in wāhi tūpuna sites should be increased.
OS3364.6	3364	100WPS Ltd	Wahi Tupuna	39.2 Objectives and Policies	That Policy 39.2.1.6 be rejected.	Support	In part	As presently drafted, Policy 39.2.1.6 is overly broad. It appears to require a cultural impact assessment even where the area is not scheduled or mapped as being of cultural significance. It is not the best policy to manage cultural effects.
OS3364.7	3364	100WPS Ltd	Wahi Tupuna	39.2 Objectives and Policies	That Policy 39.2.1.7 be rejected.	Support	In Whole	Policy 39.2.1.7 creates unnecessary uncertainty and cost for developers regarding notification of resource consent applications, creates an unreasonable burden on developers and an administrative burden on Kai Tahu. The policy should be deleted.
OS3365.1	3365	Con Tech Building Limited	Wahi Tupuna	39.2 Objectives and Policies	That Objective 39.2.1 be rejected.	Support	In Whole	As notified, QPL supports Objective 39.2.1 being rejected for the reasons set out in its primary submission.
OS3365.2	3365	Con Tech Building Limited	Wahi Tupuna	39.2 Objectives and Policies	That Policy 39.2.1.1 be rejected.	Support	In Whole	As notified, QPL supports Policy 39.2.1.1 being rejected.

Sub # / Point	Sub #	Name	Topic	Provision	Summary	QPL's position (Support or oppose)	In whole or in part	Reasons
								Policy 39.2.1.1 also applies to 'unscheduled' areas. Policy 39.2.1.1 should apply exclusively to identified wāhi tūpuna sites.
OS3365.3	3365	Con Tech Building Limited	Wahi Tupuna	39.2 Objectives and Policies	That Policy 39.2.1.2 be rejected.	Support	In Whole	QPL supports Policy 39.2.1.2 being rejected. As notified, the purpose of Policy 39.2.1.2 is unclear and overly broad. Essentially, every kind of activity could fit within the activities listed in Policy 39.2.1.2 (a) to (j).
OS3365.4	3365	Con Tech Building Limited	Wahi Tupuna	39.2 Objectives and Policies	That Policy 39.2.1.3 be rejected.	Support	In Whole	As notified, QPL supports Policy 39.2.1.3 being rejected for the reasons outlined in its primary submission.
OS3365.5	3365	Con Tech Building Limited	Wahi Tupuna	39.2 Objectives and Policies	That Policy 39.2.1.4 be rejected.	Support	In Whole	As notified, QPL supports Policy 39.2.1.4 being rejected for the reasons outlined in its primary submission.
OS3365.6	3365	Con Tech Building Limited	Wahi Tupuna	39.2 Objectives and Policies	That Policy 39.2.1.6 be rejected.	Support	In Whole	As notified, QPL supports Policy 39.2.1.6 being rejected for the reasons outlined in its primary submission.
OS3365.7	3365	Con Tech Building Limited	Wahi Tupuna	39.2 Objectives and Policies	That Policy 39.2.1.7 be rejected.	Support	In Whole	As notified, QPL supports Policy 39.2.1.7 being rejected for the reasons outlined in its primary submission.
OS3365.12	3365	Con Tech Building Limited	Wahi Tupuna	39.2 Objectives and Policies	That the Rule - Standard 25.5.2 be rejected.	Support	In Whole	The maximum earthwork volume specified in Rule 25.5.2 will capture very minor earthwork activities that will necessitate a potentially lengthy and costly resource consent process. The maximum earthworks volume in wāhi tūpuna areas should be increased.
OS3365.13	3365	Con Tech Building Limited	Wahi Tupuna	39.2 Objectives and Policies	That the Rule - Standard 25.5.7 be rejected.	Support	In Whole	QPL supports the rejection of Standard 25.5.7. As notified, the maximum volume for roads is unduly restrictive, would require developers to seek a resource consent for minor activities and is not supported by an adequate s 32 assessment.

Sub # / Point	Sub #	Name	Topic	Provision	Summary	QPL's position (Support or oppose)	In whole or in part	Reasons
OS3365.14	3365	Con Tech Building Limited	Wahi Tupuna	39.2 Objectives and Policies	That Rule 27.5.12A be rejected.	Support	In Whole	QPL supports the rejection of Rule 27.5.12A for the reasons outlined in its primary submission.
OS3365.15	3365	Con Tech Building Limited	Wahi Tupuna	39.2 Objectives and Policies	That Chapter 39 Wahi Tupuna be rejected.	Support	In Whole	QPL supports the intent of Chapter 39, however is concerned that Chapter 39 as drafted will cause unnecessary costs, delays and uncertainty and is not supported by adequate section 32 analysis. QPL therefore generally opposes Chapter 39 as currently drafted.
OS3365.19	3365	Con Tech Building Limited	Wahi Tupuna	39.2 Objectives and Policies	That the intent of protecting and enhancing the ancestral connection and interests in the District through objectives and policies relating to subdivision, use and development within the wahi tupuna areas be retained.	Support	In Whole	QPL supports the intent of Chapter 39, however is concerned that Chapter 39 as drafted will cause unnecessary costs, delays and uncertainty and is not supported by adequate section 32 analysis. QPL therefore generally opposes Chapter 39 as currently drafted.
OS3383.2	3383	Z Energy Limited, BP Oil NZ Limited & Mobil Oil NZ Limited	Wāhi tūpuna	39.5 Rules - Standards	That the proposed amendments to Rule 25.4.5.1 be retained insofar as they delete the text " whether identified on the Planning Maps or not" and amend the rule as follows: 'that modify, damage or destroy a wahi tapu, wahi tupuna or other site of significance to Maori identified on the Planning Maps'.	Support	In part	QPL supports narrowing the application of Rule 25.4.5.1, Rule 25.4.5.1 should apply to identified wahi tupuna sites and sites of significance to Maori identified on the planning maps.
OS3383.3	3383	Z Energy Limited, BP Oil NZ Limited & Mobil Oil NZ Limited	Wahi Tupuna	39.5 Rules - Standards	That Rules -Standards 39.5.1 be amended so that they clearly refer to Wāhi Tūpuna as identified on the Planning maps with amendments as suggested.	Support	In Whole	As drafted, Chapter 39 does not adequately distinguish between (mapped) Identified Wāhi Tūpuna Sites and (unmapped) Unidentified Wāhi Tupuna. Standards 39.5.1 should only apply to Identified Wāhi Tūpuna Sites.
OS3383.22	3383	Z Energy Limited, BP	Wahi Tupuna	39.5 Rules - Standards	That Rules -Standards 39.5.2 be amended so that they clearly refer	Support	In Whole	As drafted, Chapter 39 does not adequately distinguish between

Sub # / Point	Sub #	Name	Topic	Provision	Summary	QPL's position (Support or oppose)	In whole or in part	Reasons
		Oil NZ Limited & Mobil Oil NZ Limited			to Wāhi Tūpuna as identified on the Planning maps with amendments as suggested.			(mapped) Identified Wāhi Tūpuna Sites and (unmapped) Unidentified Wāhi Tupuna. Standards 39.5.2 should only apply to Identified Wāhi Tūpuna Sites.
OS3383.23	3383	Z Energy Limited, BP Oil NZ Limited & Mobil Oil NZ Limited	Wahi Tupuna	39.5 Rules - Standards	That Rules -Standards 39.5.3 be amended so that they clearly refer to Wāhi Tūpuna as identified on the Planning maps with amendments as suggested.	Support	In Whole	As drafted, Chapter 39 does not adequately distinguish between (mapped) Identified Wāhi Tūpuna Sites and (unmapped) Unidentified Wāhi Tupuna. Standards 39.5.3 should only apply to Identified Wāhi Tūpuna Sites.
OS3395.2	3395	R. Buckham	Wāhi tūpuna	2-39 Wāhi tūpuna	That the Council undertake further work to identify more concisely those values and sites that they are seeking to protect, the interrelationship with zoned and developed land, and re-notify a more informed proposal; alternatively, that the provisions be modified so as to meet the various concerns of the submitter as raised in its submission by removing the layer from its property, and to otherwise achieve the purpose of the Act.	Support		Support to the extent that the mapping of wāhi tūpuna should be removed except where specific sites of significance are identified. The mapping will have greater utility if, after consultation, the mapping is refined to specific sites of significance which can be supported by robust evidence and assessment.
OS3399.4	3399	Cattle Flat Station and Aspiring Helicopters Ltd	Wahi Tupuna	39.6 Schedule of Wahi Tupuna	That the mapping and scheduling of values and recognised threats be supported by a clear methodology and an appropriate level of detail.	Support	Support in part	QLDC has provided insufficient evidence and assessment of how Wāhi Tūpuna sites were identified and mapped. The mapping will have greater utility if, after consultation, the mapping is refined to specific sites of significance which can be supported by robust evidence and assessment.