

QLDC District Plan Change 49 Earthworks Hearing – 5 December 2014

1. Te Anau Developments is a wholly owned subsidiary of Real Journeys Limited. Real Journeys is the largest tourism operator in Otago and Southland. Te Anau Developments was incorporated in 1984 and is the owner of Real Journeys Limited land holdings. In 2013 Te Anau Developments purchased 155 hectares of land at Walter Peak after leasing this property since 1991. On this parcel of land Real Journeys operates a restaurant and bar facility; the Colonel's Homestead and High Country farm tours in conjunction with Real Journeys "TSS Earnslaw" Lake Wakatipu cruises. Accordingly the plan change 49 provisions which relate to Walter Peak are of importance to us. Moreover because Cardrona Alpine Resort is another wholly owned subsidiary of Real Journeys; the plan change 49 conditions which apply to Ski Area Sub Zones are also of concern.

2. Real Journeys hosts approximately 230,000 visitors per annum at Walter Peak therefore Real Journeys operation at Walter Peak contributes significantly to the economy of Queenstown, mainly in the summer months. The QLDC has recognised the economic importance of the Otago Ski Industry to the region and proposed a permissive regime for Earthworks in Ski Area Sub-Zones. Te Anau Developments assert that because of the economic importance of the tourism activities carried in Rural Visitor Zones; the Earthworks provisions in the District Plan should also be less restrictive in Rural Visitor Zones.

3. Rural Visitor Zones

Te Anau Developments contends that Objective 4 should also apply to Rural Visitor Zones. The parcel of land Te Anau Developments owns at Walter Peak is effectively a small farm and is managed as such. Consequently the earthworks provisions which enable for the efficient undertaking of farming activities should also be applicable to this property. Moreover as the new owner of this Walter

Peak parcel of land, we are proposing to develop this property further; improving the farming infrastructure and constructing cycling and walking tracks to improve the recreation opportunities at this site; creating an improved amenity for visitors and Queenstown residents alike. Restrictive District Plan rules will be an impediment to this development.

4. The proposed exemption from Rule 22.3.3.(i) and 22.3.3.(ii)

The proposed proviso around maintenance of tracks is totally impractical and we are opposed to this proposed 10% threshold especially for a 10 year period. The rationalisation “to provide administrative certainty” for a 10% threshold in the section 32 report is weak. Tracks can be quite featureless it will be virtually impossible to ensure *“maintenance work results in less than a 10% increase in exposed surface area of that feature in any 10 year period”*.

5. The proposed caveat of a ten year period is also unworkable. Many properties are operated by staff that change every few years and institutional knowledge is not retained hence the staff managing a property at a given time do not know what maintenance works have been undertaken in previous years. This is especially so in Queenstown where; the workforce is very fluid and staff turnover is very high. Therefore Te Anau Developments request this exemption be amended to allow for: maintenance work results in less than a 10% increase in exposed surface area of that feature in any 3 year period.

6. Ski Area Sub Zones

Te Anau Developments supports the proposed Plan Change 49 Ski Area Sub-Zone exemption *“Volume of earthworks, cut and fill heights and slope, for both earthworks and bulk earthworks, for the establishment and maintenance of trails, operational areas and access within the Ski Area Sub-Zones.”* Nevertheless due to the regional economic importance of the Otago Ski Industry; Te Anau

Developments is still opposed to the dilution of the current exemption which applies to all earthworks; carried out for any purpose within a Ski Area Zone. Especially because it is unclear if the above exemption is broad enough to encompass all the earthworks activities undertaken during the operation of modern Ski Fields such as the installation and maintenance of infrastructure associated with snow making.

7. If Resource Consents are required Te Anau Developments supports the proposed provision Non-notification of Applications 22.3.6.6 (a) (iv)

8. Site Standards.

Regarding proposed rule 22.3.3 i Volume of Earthworks; Te Anau Developments contends that Rural Visitor Zones should have the same tier of maximum volume of earthworks as Rural General Zone. As stated earlier our property at Walter Peak is a farmed hence, Walter Peak should be aligned with Rural General Zone and have the same tier of maximum volume of earthworks as this Zone; especially considering the large unstable scree fields that lie above the property, and tumble down and require clearance to keep pasture free.



9. Environmental Protection Measure

Te Anau Developments believes the proposed Environmental Protection Measures are ill defined. The plan provides insufficient guidance as to what

would represent: “effective” sediment, erosion and dust control measures. Also how are land owners to manage instances when undertaking earthworks and an un-forecasted downpour occurs and strong winds come up resulting in unanticipated run off and dust clouds respectively?

10. Site Standards – Water Bodies

Te Anau Developments contend the District Plan needs to allow for remedial defence earthworks to ensure the property and structures can be protected from damage during extreme weather events. For instance, above the Colonels Homestead at Walter Peak there are large areas of scree and boulders that are brought down by mainly flood events and we need to undertake remedial works to ensure rocks and water do not damage the Colonels Homestead; generator shed and other structures on the property.



11. The trees were planted in the Beach Bay Reserve to deflect the rocks and stones from the Colonels Homestead at Walter Peak however, these trees are not enough to prevent property damage during flood events. Hence Te Anau Developments needs to construct rock culverts, rock armouring and deepen stream beds to divert the scree, water and rocks away from the structures on

our property. The ability to undertake such works at short notice will become even more essential as in the near future Te Anau Developments intends to start clearing wilding pines from the Beach Bay Reserve; removing most of the trees that afforded protection for the Colonels Homestead. That is, when stream beds need to be deepening or a water course must be diverted to protect our property then earthworks in excess of 20 m³ within 7 m of a water body will need to be carried out at short notice. Failure or delays to undertake such works would be catastrophic for Real Journeys operation at Walter Peak.

12. In the Regional Water Plan for Otago it is a permitted activity to alter or reconstruct any defence against water, other than on the bed of any lake or river, providing there is no permanent change to the scale, nature or function of the defence against water. Accordingly Te Anau Developments contends it unreasonable for QLDC to require resource consent for such activity when the Otago Regional Council does not; because the Regional Council recognises that defences against water are important in Otago as they mitigate flood and erosion hazards.

13. Further with respect to the development of snow making facilities; which involves the creation of reservoirs and diversion of streams; it would be impractical to adhere to the proposed water bodies' site standards. Also we presume that the proposed Water Bodies site standards are aimed at protecting natural or significant water bodies, not water bodies created for the purpose of snow making. Hence Te Anau Developments contend that snow making activities in the Ski Area Subzones should be exempt from the proposed Water Bodies Site Standards.

