

**BEFORE THE QUEENSTOWN LAKES DISTRICT PLAN REVIEW HEARINGS  
PANEL**

**IN THE MATTER** of the Resource Management Act  
1991

**AND**

**IN THE MATTER** of Stage 2 Variation Visitors  
Accommodation Submission  
2599 Teece Irrevocable Trust No.  
3

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**BRIEF OF EVIDENCE OF ELIZABETH STEWART**

**Date 24<sup>th</sup> August 2018**

## Table of contents

<b>1.</b>	<b>Qualifications &amp; Experience</b>	<b>2</b>
<b>2.</b>	<b>Scope</b>	<b>3</b>
<b>3.</b>	<b>Executive Summary</b>	<b>4</b>
<b>4.</b>	<b>The Site</b>	<b>5</b>
<b>5.</b>	<b>Planning Status</b>	<b>6</b>
<b>6.</b>	<b>Environmental Effects</b>	<b>13</b>
<b>7.</b>	<b>S32 Assessment</b>	<b>18</b>
<b>8.</b>	<b>RMA Part 2</b>	<b>20</b>
<b>9.</b>	<b>Planners Reports</b>	<b>22</b>
<b>10.</b>	<b>Conclusion</b>	<b>26</b>
<b>Appendix A</b>	Further submissions on various other submissions on the PDP Stage 2 residential visitors accommodation and homestay provisions	
<b>Appendix B</b>	Plans of the sought areas of UGVASZ	
<b>Appendix C</b>	Recommended rules and assessment matters	
<b>Appendix D</b>	Aerial photograph of site	
<b>Appendix E</b>	Geconsulting Ltd Report	
<b>Appendix F</b>	Infrastructure Feasibility report	
<b>Appendix G</b>	Assessment of the VASZ against the relevant PDP objectives and policies.	
<b>Appendix H</b>	Comparative cost benefit analysis of the proposed VASZ	

## **1. QUALIFICATIONS AND EXPERIENCE**

- 1.1 My name is Elizabeth Anne Stewart. I have a Bachelor of Science from Canterbury University, Christchurch, and a Post Graduate Diploma in Resource Studies, from Lincoln University, Lincoln. I have approximately 15 years resource management and planning experience. I have spent approximately 5 years working in the United Kingdom at different local authorities processing a wide variety of land use consents, including the delivery of a Major Development Area project (Outline Planning Permission) comprising 132ha for “mixed used” development. I held the position of Senior Planner with Aurecon (formerly Connell Wagner) for approximately 2 years, where I undertook a number of large scale land use and subdivision applications, Notice of Requirements and Plan Changes. In more recent times, I have pursued part – time work with a small civil engineering firm, whilst raising a young family. I have held the position of Senior Planner at Aston Consultants Resource Management and Planning for the last three years.
- 1.2 Aston Consultants works extensively in the Greater Christchurch area, with numerous clients with interests in subdivision, land development and land use planning matters. I have prepared resource consents and hearing evidence for a wide range of land use and subdivision proposals including retirement villages, residential, rural residential and business developments, schools and pre-schools and medium density housing. I prepared submissions and evidence on the Christchurch and Hurunui District Plan Reviews for a range of clients.
- 1.3 I am familiar with the Queenstown Lakes District Operative Plan and District Plan Review, in respect of the relevant chapters as they relate to this evidence. I have visited the Teece Irrevocable Trust No. 3 (‘the Trust’) property which is the subject of this evidence.
- 1.4 I confirm that I have prepared this evidence in accordance with the Code of Conduct for Expert Witnesses (Environment Court Consolidated Practice Note, November 2011). The issues addressed in this statement of evidence are within my area of expertise except where I state that I am relying on the evidence or advice of another person.
- 1.5 The data, information, facts and assumptions I have considered in forming my opinions are set out in the part of the evidence in which I express my opinions.

- 1.6 I have not omitted to consider material facts known to me that might alter or detract from the opinions I have expressed.
- 1.7 The key documents which I have relied upon in preparing my evidence are the following:
- (a) the Resource Management Act 1991 (RMA);
  - (b) Queenstown Lakes Operative District Plan ('ODP');
  - (c) Queenstown Lakes Proposed District Plan ('PDP') – Decisions version
    - Chapter 2 – Definitions (Stage 1)
    - Chapter 3 – Strategic Directions (Stage 1)
    - Chapter 6 – Landscapes (Stage 1)
    - Chapter 21 – Rural Zone (Stage 1)
    - Chapter 28 – Natural Hazards (Stage 1)
    - Chapter 33 – Indigenous Vegetation & Biodiversity (Stage 1)
    - Variation – Visitor Accommodation (Stage 2)
  - (d) Amy Bowbyes Section 42A Report\_(dated 23 July 2018)
  - (e) Rosalind Devlin Evidence in Chief (dated 10 August 2018) and Rosalind Devlin Supplementary Evidence (dated 10 August 2018)

## **2. SCOPE**

- 2.1 My evidence focusses on the key matters raised in the Trust submission on the PDP Stage 2 Visitors Accommodation Variation. There are two main elements to the Trust submission as outlined below.
- 2.2 The Trust submission as lodged sought that the neighbouring Rural Visitors Arcadia Zone at Upper Glenorchy be extended to cover the Trust site, with amendments and additions to the Operative Plan Rural Visitors Arcadia Zone provisions as appropriate (as outlined in the submission ). With respect to submission scope, the Hearing Panel Chair Memorandum - Second Decision Relating to Submissions not on the PDP dated 2<sup>nd</sup> August 2018, concludes that:

*I conclude the appropriate response to strike out those portions of the submission which seek to replace the Rural Zone with a visitor accommodation-specific zone (whether called*

*Rural Visitor Zone or otherwise) but leave within the submission the ability to request a visitor accommodation sub-zone with the characteristics outlined in the submission.....*

- 2.3 As such, my evidence focuses on the now proposed Visitor Accommodation Sub Zone (VASZ) for the Trust property.
- 2.4 The Trust filed further submissions on various other submissions on the PDP Stage 2 Visitors Accommodation Variation. (as listed in **Appendix A**). With respect to its further submissions, the Trust relies on the evidence of others.

### **3. EXECUTIVE SUMMARY**

- 3.1 The Trust seek that the area identified on the Attached Plan (**Appendix B**) retain its Rural zoning but that the proposed Upper Glenorchy Visitors Accommodation Sub-Zone ('the subzone') also apply as an 'overlay' to this land.
- 3.2 The proposed subzone will enable the establishment of:
- A homestead, a manager's residential unit (both defined as residential units in the PDP) and a farm-stay/lodge type building (defined as VA in the PDP), with a total maximum building footprint of 2,000m<sup>2</sup>, within a 7500m<sup>2</sup> area identified in Appendix B. The residential units can incorporate RVA and/or Homestays.
  - A maximum total building footprint of 400m<sup>2</sup> enabling cabin-in-the-woods buildings located in discrete cleared locations within the beech forest within Appendix B.
- 3.3 Amended Planning Map 6 & 9 identifies suitable development areas within the subzone, and is based on expert advice relating to landscape, natural hazards, and topography. The proposed rules package restricts the scale and extent of development as above, and in addition limits buildings to a maximum height of 5.5m. Subject to meeting these development standards, RVA and Homestay are permitted, and Residential Units and VA are restricted discretionary, with matters of discretion covering location, external appearance, size and colour of buildings; lighting; natural hazards (including tree windfall); visual prominence from both public places and private locations; associated earthworks, access, parking, traffic (pending volume) and landscaping; provision of water supply, sewage treatment and disposal, electricity and telecommunication services (where

necessary); and indigenous vegetation clearance, restoration and enhancement. (see **Appendix C** for recommended rules and assessment matters).

- 3.4 In my opinion, the proposed subzone reflects the intent of the RMA, in particular the 'enabling' approach under s5, and on an overall analysis better achieves the objectives of the pRDP than the provisions as notified. It provides a more enabling and certain consenting framework for VA in a location where the ONL can absorb suitably scaled and designed development. It is a more effective and efficient than the notified provisions.

#### **4. THE SITE**

- 4.1 The Trust owns 278 ha of land at upper Glenorchy, contained within 15 allotments and 6 certificates of title ('the Site'), legally described as Lots 1, 2 and 3 DP23952; Lots 4 and 6 DP24043; Part Sections 16, 17, 18, 19, 20, 21, 22 and 23 Block II Dart Survey District (SO404); and Sections 40 and 48 Block II Dart Survey District (SO404) and as shown on the aerial photograph attached as **Appendix D**.
- 4.2 The Site is immediately east of Dart River. Most of the land is open flat grazing land (known as Mill Flat) with mature beech forest covering the eastern most title (approximately one third of the Site area). This beech forest covers extensive areas of DOC land adjoining to the east. There are no existing dwellings for other buildings on the Site.
- 4.3 The Site was purchased in 1998 by Dr David Teece, a New Zealand born economist now living in San Francisco. It was originally part of Jim Veint's farm (owner of Arcadia Station). Jim has kept the remainder of his farm and has leased the property back for grazing purposes since that time.
- 4.4 The land was subsequently transferred to a trust for Dr Teece's children so they could appreciate their New Zealand heritage. It was also in his contemplation that one day he would look to build an Eco Lodge on the property.
- 4.5 Lindsay Lloyd, former partner and now consultant lawyer at MDS Law Christchurch is the Sole shareholder and manager of the corporate trustee Heritage PTC LLC.
- 4.6 The Site comprises approximately 100 ha of good grazing uncultivated land with some matagouri; 80 ha of beech forest; 65 ha of swamp; and 31 ha unfenced river bed. In discussions with the current lessee of the land since 1998 (Jim Veint), over the economic viability of the land for farming purposes, Mr Veint has advised that the general surface of

the land includes extensive areas of peat, making it difficult to cultivate and access with heavy tractors. Mr. Veint has also advised that there is not enough farm to make a profitable venture because of the other expenses, which would be required (including large amounts of lime to fertilise the soil) and the need to buy in winter feed. There are no farm buildings, which would be required for a 'stand alone' farm operation (woolshed, cattle yards etc.).

## 5. PLANNING STATUS

### Operative District Plan

- 5.1 As the Stage 1 PDP decisions are still subject to appeal, I summarise the 'equivalent' ODP provisions below.
- 5.2 The Site is zoned Rural General in the ODP. It adjoins but is outside areas of significant indigenous vegetation. All of the land in question is within the Operative QLDDP Rural General Zone as shown on the copy relevant part of Planning Map 6 below. The Site adjoins but is outside areas of significant indigenous vegetation.

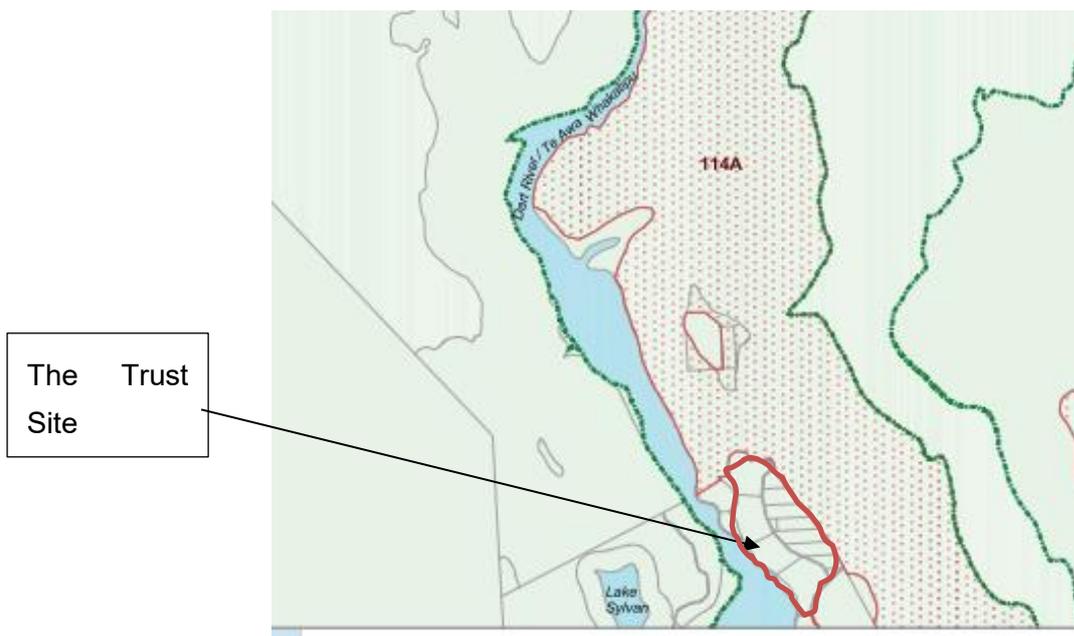


Fig 1: Relevant part of Operative QLDDP Planning Map 6

Site – Red (within Rural General Zone)

Rural General Zone – light green

Areas of Significant Indigenous Vegetation – red spots

- 5.3 The ODP does not identify Outstanding Natural Landscapes (ONLs) or Visual Amenity Landscapes (VALs), other than within the Wakatipu Basin and Wanaka locality.
- 5.4 Resource consent applications are required to include a landscape assessment sufficient to determine the landscape categorisation of the application site (ONL, VAL or neither), and an assessment of the proposal against the relevant ODP landscape assessment matters.
- 5.5 Within the Rural General Zone any residential buildings require some level of consenting. Where a Residential Building Platform (RBP) was approved as part of a previous consent (discretionary where not less than 70m<sup>2</sup> or more than 1000m<sup>2</sup>, otherwise non complying), a building within this area would be a controlled activity, or otherwise discretionary.
- 5.5 The ODP Introduction (Chapter 1 iii) notes that discretionary status is *“because in or on outstanding natural landscapes and features the relevant activities are inappropriate in almost all locations within the zone, particularly within the Wakatipu basin or in the Inner Upper Clutha area.”*
- 5.6 Clearance of indigenous vegetation is only permitted where totally surrounded by pasture and other exotic species and less than 0.5 ha in area and more than 200m from any other indigenous vegetation which is greater than 0.5 ha in area, and other minor clearance as listed in the rule).
- 5.7 Subdivision and VA in the Rural General Zone is also a discretionary activity.

### **Stage 1 PDP**

- 5.8 Stage 1 of the PDP was notified in August 2015 and contains most chapters of the PDP including the residential, rural and commercial zones. Decisions on the matters heard were notified on 7 May 2018. Stage 1 decisions are subject to appeals. The Trust did not make any submissions in respect of the Stage 1 zoning of the Site as they were unaware of the notification.
- 5.9 The Site is within the Rural Zone and is identified as within an Outstanding Natural Landscape (see Fig. 2 below) in the PDP. It is adjoining but does not contain any Significant Natural Areas.
- 5.10 The consenting framework is essentially the same as under the ODP. Dwellings, subdivision and VA are a discretionary activity and shall include assessment against relevant assessment matters (21.21 Assessment Matters Landscape) which cover Outstanding Natural Landscapes, and ‘other factors and positive effects’ (ie whether a specific building design, rather than nominating a building platform, helps demonstrate whether the proposed

development is appropriate; whether the proposed development is consistent with rural activities or the rural resource and would maintain or enhance the quality and character of the landscape; positive effects in relation to the proposed development, or remedying or mitigating the continuing adverse effects etc). The general policy framework of the PDP seeks to enable farming and other appropriate activities (including revenue producing activities) that rely on the rural resources, while protecting, maintaining and enhancing landscape values.

5.11 Importantly Rule 21.21.1.1 states: -

*In applying the assessment matters, the Council will work from the presumption that in or on Outstanding Natural Features and Landscapes, the applicable activities are inappropriate in almost all locations and that successful applications will be exceptional cases where the landscape or feature can absorb the change and where the buildings and structures and associated roading and boundary changes are reasonably difficult to see from beyond the boundary of the site the subject of application*

5.12 The mature beech forest areas within the Site are largely over 2m height. Clearance of indigenous vegetation greater than 2.0 metres in height, in any continuous period of 5 years is limited to, 50m<sup>2</sup> on sites that have a total area of 10ha or less; and 500m<sup>2</sup> on any other site. Non compliance with this is discretionary (Rule 33.5.1 & 33.5.2).

5.13 VA is also discretionary.

The Site

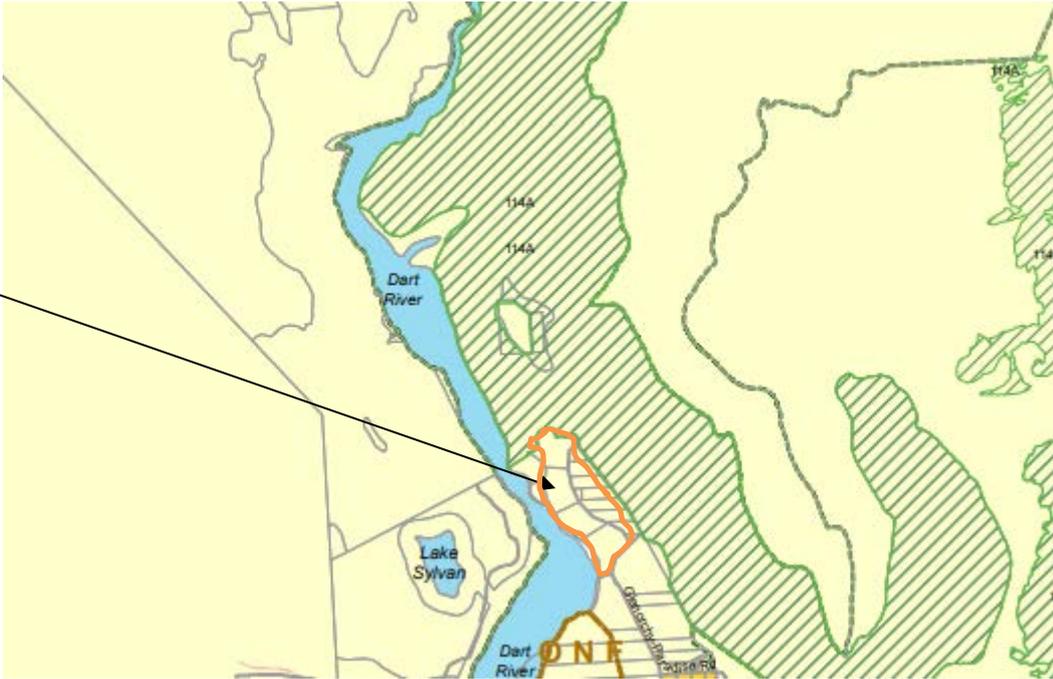


Fig 2: Relevant part of Proposed QLDDP Planning Map 6  
• Peach– Rural Zone and Outstanding Natural Landscape  
• Green diagonal stripe – Significant Natural Areas

**Proposed District Plan Variation - Visitors Accommodation (to be added to Stage 1 – Chapter 21).**

5.14 The focus of the Stage 2 VA Variation changes appears to be the townships where residential visitor accommodation ‘competes’ with accommodation for residents, including seasonal workers. However, it also covers the Rural Zone.

5.15 VA is defined as:

*The use of land or buildings (excluding the use of residential unit or residential flat) to provide accommodation for paying guests where the length of stay for any guest is less than 90 days; and*

- i. Includes such accommodation as camping grounds, motor parks, hotels, motels, backpackers accommodation, bunkhouse, tourist houses, lodges, timeshares and managed apartments; and*
- ii. Includes services or facilities that are directly associated with, and ancillary to the visitor accommodation such as food preparation, dining and sanitary facility, conference bar, recreational facilities and others of a similar nature if such facilities*

*are associated with the visitor accommodation activity. The primary role of these facilities is to service the overnight guests of the accommodation however they can be used by persons not staying overnight on the site.*

*iii. Includes onsite staff accommodation.*

*iv. Excludes Residential Visitor Accommodation and Homestays.*

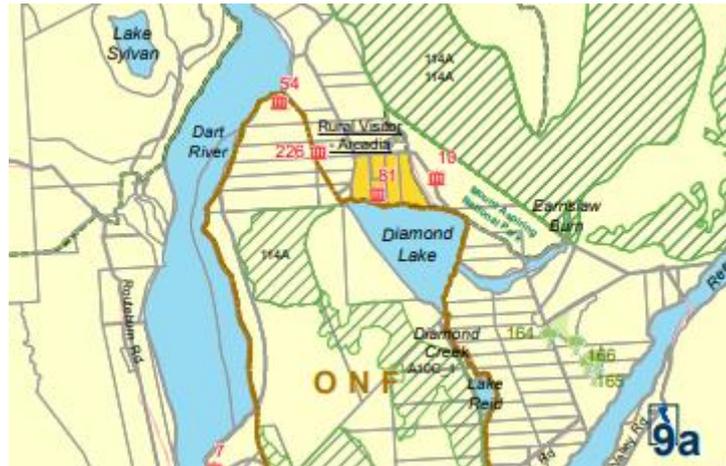
5.16 The Variation introduces a Visitors Accommodation Sub-zone which applies to specific locations in parts of the Low Density, Medium Density and Large Lot Residential Zones. These for the most part contain existing visitor accommodation facilities (and in some cases provide for expansions onto adjoining land). Most have a similar VASZ status in the ODP. Visitor accommodation is a restricted discretionary activity, subject to the following assessment matters:-

- Location, scale and nature of activities;
- Location, provision and screening of parking and access;
- Landscaping;
- Noise mitigation and methods of mitigation (through design and management controls);
- Hours of operation, including in respect of ancillary activities;
- The external appearance of buildings, including design, materials and external lighting and design measures to limit the impact on adjoining residential activities.

5.17 Applications for VA under the above rules are stated in the Variation as non-notified.

### **Adjoining Arcadia Rural Visitors Accommodation**

5.18 Neighbouring the Trust Site (3.5km to the south, separated by open grazing land) is the ODP Rural Visitors Arcadia Zone (to be addressed at Stage 3 of the PDP), as shown in yellow on the following figure. Subdivision consent was granted in 2014 (RM130799) to establish twelve allotments with eleven residential building platforms, access lots, common areas and earthworks with the Rural Visitors Arcadia Zone - at 1733 Glenorchy – Paradise Road.



5.19 The RM130799 site is zoned Rural Visitor Zone in the ODP along with adjoining properties to the east also owned by the landowner, Jim Veint. A structure plan for the entire Rural Visitor Zone was approved by way of RM110010 as set out below.

Fig 2: Arcadia Station Approved Structure Plan (RM110010)



Key:

Yellow – commercial; Red – Residential; Blue – Visitor Accommodation; LE – Lakeside Recreation; OS – Open Space

5.20 The status of -Visitor Accommodation is controlled with respect to the following matters:-

- (a) Access
- (b) Flood Risk
- (c) Hours of Operation

- (d) Landscaping
- (e) Screening of Outdoor Storage Areas
- (f) Setback from Roads

5.21 The Rural Visitor Zone applies to a number of rural and isolated locations, including in highly scenic settings e.g. at Walter Peak, Bobs Cove.

## **6. ENVIRONMENTAL EFFECTS**

### **Introduction**

- 6.1 Section 74 (1) of the RMA provides that a territorial authority must prepare and change its district plan in accordance with, amongst others, its functions under s 31 of the Act. These functions include the control of any actual or potential effects of the use or development of land (31(1)(b)). In that context, it is therefore important to establish that the proposed subzone is suitable 'in principle' for the proposed activities (homestead, managers residence, visitors accommodation, possible homestay and/or residential visitor accommodation) and that the proposed rules package will adequately control any effects associated with a specific proposal, to be assessed as a non-notified restricted discretionary activity.
- 6.2 The subzone is located in an ONL and, as noted in Ms Devlin's Supplementary Evidence (p2), is shown on the QLDC Hazard Register as containing alluvial fans and possibly susceptible to liquefaction risk.
- 6.3 The proposed subzone development areas and restrictions have been developed based on expert landscape, natural hazard and surveying advice in particular. This advice establishes that these locations are suitable for appropriately designed development.
- 6.4 Given the above conclusions, the restricted discretionary assessment matters can be limited to matters of design detail. Natural hazards have been retained as an assessment matters as the expert geotech advice is that further investigation will be beneficial to further refine the location of the development sites and address potential mitigation measures.

## **Landscape/Visual effects**

- 6.5 Mr Ben Espie has provided expert landscape architect advice briefly summarised below.
- 6.6 The Western UGVASZ occupies an approximately 7500m<sup>2</sup> terrace area that sits above the level of the Dart River floodplain but below the level of the surrounding grazed pasture. A homestead cluster of buildings in this location will be particularly well absorbed into existing landscape character such that the open pasture, surrounding mountains and broader ONL will dominate the character.
- 6.7 Notwithstanding, in order to accord with the PDP provisions, the buildings would need to be designed so as to be of a relatively low height, include comprehensive landscaping and planting that would tie into its context and screen it from the south.
- 6.8 Relatively isolated instances of visitor accommodation in rural and ONL areas are not discordant with the outcomes sought by the PDP and do not necessarily degrade landscape character. The relief sought in relation to the Mill Flat area will not adversely affect landscape character.
- 6.9 The eastern UGVASZ area occupies the northern part of a fan landform that is covered in mature beech forest.
- 6.10 To accord with the proposed provisions of the PDP, a visitor accommodation facility in this forest setting would need to be designed so as to be of small scale, with minimal vegetation clearance, an inconspicuous access track and would include vegetation management measures and planting to bring about ecological enhancement.
- 6.11 There will be some loss of natural character which would need to be balanced by measures that enhance the ecological health and value of the forested areas (ie exclusion of stock and pest management and area of planting).
- 6.12 PDP Chapter 6 ONL policy that built form is reasonably difficult to see can be achieved for both areas.

## **Conclusion**

- 6.13 Overall, in respect of the western UGVASZ Mr Espie concludes that the proposed provisions are such that design would involve landscaping that would ensure visual containment. Some view of the western area are available, however the location and proposed provisions are

such that development will be reasonably difficult to see and will not inappropriately affect visual amenity or landscape character.

- 6.14 With respect to the eastern area, the UGVASZ would develop accommodation surrounded by mature beech forest on part of the landholding. While this represents a significant new element, the proposed provisions require consideration of vegetation restoration and enhancement. On balance, Mr Espie therefore concludes that in terms of landscape character effects could be achieved and that visual effects of the activity would be well hidden.

### **Traffic**

- 6.15 Whilst not a traffic engineer, I have reviewed numerous traffic assessments submitted with resource consents and plan changes and work with traffic experts on an ongoing basis. Accordingly, I have a general understanding and appreciation of traffic related matters associated with development proposals. I have also discussed my assessment below of likely traffic generation figures with an experienced traffic expert.
- 6.16 Based on a maximum building footprint of 2,000m<sup>2</sup> for Area A and 400m<sup>2</sup> for Area B, the effects of traffic movements to and from the Site arising from development provided for within the subzone are likely to be less than minor – both on the surrounding network and on amenity of neighbouring properties. This is based on the following approximate breakdown of the potential number of beds that could be incorporated as part of anticipated development within the subzone. This also takes into consideration the remote rural location of the Site.

#### *Homestead and Managers Residence*

- 6.17 Given the relatively secluded nature of the Site, it is reasonable to determine that the manager's residence could generate up to 6 vehicle movements a day with the homestead also generating up to 6 vehicle movements a day. Collectively, this results in a total of 12 vehicle movements per day to and from the Site.

#### *Farmstay/Lodge*

- 6.18 A farm-stay/lodge type building (defined as Visitors Accommodation in the PDP) may have up to 10 beds (also allows for residential visitor accommodation or homestay) and could generate up to 20 trips per day (or put another way, 2 trips per bed per day).

6.19 Based on the above it is anticipated that the development in Area A could generate up to 25 vehicle movements per day to and from the Site.

#### *Cabins - Visitor Accommodation*

6.20 A maximum building footprint of 400m<sup>2</sup> could accommodate four cabins, each with two bedrooms. In a normal urban context a typical two bedroom dwelling could generate up to 10 vehicle movements a day. Again based on the relatively secluded nature of the Site, the number of vehicle movements can reasonably be considered to be less than your normal urban environment. On that basis, I consider it reasonable to assume up to four vehicle movements per cabin, which equates to a total of 16 vehicle movements per day.

#### *Conclusion*

6.21 Based on the above, it is considered that the Site could reasonably generate approximately 41 vehicle movements a day. This level of traffic generation is unlikely to have any noticeable effects on the adjoining transportation network . As a precautionary measure, I have included traffic as activity matter of discretion, where traffic volumes with the VASZ are predicted to exceed 50 vehicle movements per day.

6.22 In accordance with the Infrastructure Report prepared by Civilised Ltd, Paradise Road has a Road Reserve of 20m, allowing for sufficient room for the creation of the access way and intersection with Glenorchy Paradise Road in accordance with the requirements of Diagram 8 contained in Scheduled 29.2 of the QLDC Proposed District Plan – Stage 2.

6.23 Civilised Ltd also confirm that sight distances from the access location on to the Glenorchy – Paradise Road have been assessed in accordance with 29.5.18 of the QLDC Proposed District Plan Stage 2 for a speed limit of 100km/hr. The required sight distance for Residential Activity in a 100km/hr speed environment is 170m and for Other Activities in a 100 km/hr speed environment is 250m. Site inspection has confirmed that the sight distances are in excess of 250m.

#### **Natural Hazards**

6.24 GeoConsulting Limited have prepared a Hazard Assessment in respect of the Site (**Appendix E**).

- 6.25 In summary, Area A in UGVASZ is within an area which is identified as potentially subject to natural hazards. Liquefaction may be an issue where elevated groundwater levels exist. As reported the threat in this area can be mitigated by a specific design for a building platform. In respect of flooding, the report recommends that development be subject to topographical/legal survey and hydrological assessment. Mitigation measures may also be necessary to provide greater certainty over the security of the site. This can be achieved at the resource consent stage.
- 6.26 Area B in the UGVASZ encompasses the bush covered fan through which a number of permanent or ephemeral side streams flow. The threat of debris flow is best avoided by locating cabin sites on higher standing ground within the fan area. Further investigation is recommended for determining the best sites. This can be achieved at the resource consent stage

### **Infrastructure**

6.27 Civilised Ltd (refer to **Appendix F**) have considered the necessary development infrastructure for the level of development enabled by the subzone in relation to:

- Access
- Water supply
- Wastewater disposal

6.28 Their advice is summarised below.

#### *Access*

- 6.29 Access to the Site could be constructed in a number of locations along the road frontage. Civilised Ltd assessed one particular location in order to prove feasibility and explore the issues associated with providing access to the Site.
- 6.30 Civilised Ltd confirm that new accesses from the road network will be required for future development of the areas subject to the rezoning request. Access will come from the existing Glenorchy –Paradise Road and can be designed and constructed to meet the requirements of Queenstown Lakes District Council standards.

### *Water supply*

- 6.31 Civilised Ltd note that several water courses were evident across the Site. This included Cassells Stream toward the south of the Site (and other unnamed creeks at various locations through the site), Dart River to the west of the Site, and adjacent to the proposed homestead/lodge site, a small stream.
- 6.32 For the homestead/lodge area, either a water bore drilled into the aquifers underlying the Site or a surface water take from a creek are anticipated to both be able to provide a suitable water source for the future development.
- 6.33 For the cabins in the woods accommodation, a water intake in one of the streams that run through the forested area is anticipated as able provide a suitable water source.
- 6.34 Civilised Ltd report that issues in respect of potential sources of contamination can be managed by such measures as ensuring the water intake can be removed or shutoff during heavy rain events to minimise contamination or ultraviolet disinfection or management control over the stream intake.

### *Wastewater*

- 6.35 Civilised Ltd confirm that no community or Council scheme is available for connection in close proximity to the Site. Wastewater is able to be treated with soakage to ground on site by way of on site wastewater disposal systems. The suitability of the ground for receiving the wastewater flows has been confirmed following observations carried out on site.

### *Conclusion*

- 6.36 Based on the above advice, the Site is able to be appropriately serviced in terms of access, water and wastewater. Provision of water supply, sewage treatment and disposal, electricity and telecommunication services (where necessary) are included as restricted assessment in the subzone so that the specifics of a future development proposal with regard to these matters can be assessed.

### **Cumulative effects**

- 6.37 In *Dye v Auckland RC (2002)*, the Court of Appeal stated:

*A cumulative effect is concerned with things that **will** occur rather than with something which may occur [...]. The concept of cumulative effect arising over time is one of a gradual build-up of consequences. The concept of combination with other effects is one of effect A combining with effects B and C to create an overall composite effect D.*

- 6.38 The UGVASZ is some 2.5km north of the nearest farm shed and 3.5km north of Paradise Trust and Arcadia homesteads. Development within the proposed subzone would be the northern most building before the National Park begins and would be a relatively isolated rural element surrounded by a large area of open pasture.
- 6.39 In my opinion the key question is whether the creation of the UGASZ and proposed buildings in an already low density rural environment, would change the character of the area in which it is found. To that end, I agree with Mr Espie that the creation of a building or small cluster of buildings in this location would not be an unexpected element that is incongruous in relation to existing rural settlement patterns. I also consider that given the relatively isolated instances of visitor accommodation in the rural and ONL environment are not at odds with the outcome sought by the PDP and does not degrade the character of the area. To that end, it is not anticipated that the proposed rezoning of the Site will create adverse cumulative effects.

## **7. SECTION 32 ASSESSMENT**

- 7.1 Section 32 of the RMA requires consideration of :-
- The extent to which the objectives of the proposal are the most appropriate way to achieve the purpose of the Act; and
  - whether the provisions in the proposal are the most appropriate way to achieve the objectives by identifying other reasonably practicable options for achieving the objectives; and assessing the efficiency and effectiveness of the provisions in achieving the objectives.
- 7.2 Efficiency and effectiveness includes assessment of the cost and benefits of environmental, economic, social, and cultural effects that are anticipated from the implementation of the provisions; including the opportunities for economic growth and employment that are anticipated to be provided or reduced.
- 7.3 The Council's VA Section 32 Assessment (dated 2 November 2017) concentrates exclusively on the provisions for VA in the residential zones.

- 7.4 In light of the scope issues addressed in the Second Procedural Minute<sup>1</sup>, the Trust now seeks:-
- retention of the ODP provisions with respect to RVA and Homestays; and
  - a Visitor Accommodation subzone (overlay) to apply to the Trust site.
- 7.5 No changes to the PDP objectives and policies are proposed. Accordingly my s32 analysis considers the extent which the proposed amended PDP provisions are the most appropriate way to achieve i.e. implement the PDP objectives, including in comparison to other practicable options. **Appendix G** identifies and assesses the VASZ against the relevant PDP objectives and policies.
- 7.6 The overall thrust of the objective and policy framework is to provide for rural diversification, including VA in locations and in a manner which protects, maintains and enhances landscape quality and character, rural amenity and natural resource values (some policies seek to protect, others to maintain and/or enhance). Development in ONLs is generally only considered appropriate where the landscape can absorb change and the development is reasonably difficult to see beyond the site boundary.
- 7.7 The significant socio-economic benefits of well designed and appropriately located visitor industry facilities and services are to be realised across the District.
- 7.8 More specific policies seek to manage the effects of development in rural areas, including with respect to infrastructure, lighting, traffic and natural hazards.
- 7.9 The evidence and assessment establishes that the proposed VASZ is entirely consistent with all of the above (see **Appendix G** for in depth assessment).
- 7.10 **Appendix H** provides a comparative cost benefit analysis of the proposed VASZ (Preferred Option 1) against the PDP alternative (Option 2 PDP Status Quo i.e. retain VA is a discretionary activity in the Rural Zone).
- 7.11 Both options implement the PDP objectives and policies but in my opinion Option 1 does a 'better job' for the following principal reasons:-

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<sup>1</sup> 2 August 2018

- it better implements Objective 3.2.1.1 by providing a generally enabling consenting framework which facilitates the delivery of well designed and appropriately located visitor accommodation within the proposed subzone;
- it provides enhanced public access to the natural environment – both at the Trust site, and by enabling visitors to stay in a remote wilderness ONL setting;
- It will enable the continuation of low intensity pastoral farming by providing another source of income for the property, which is not otherwise economically viable for low intensity farming;
- It better provides for indigenous biodiversity protection and regeneration of the remaining beech forest areas.

7.12 Whilst some of the above may be achievable through a future visitor accommodation resource consent proposal, the higher consenting cost and uncertainty associated with this consenting pathway may well discourage any such future applications.

7.13 In my opinion, Option 2 is not entirely consistent with those objectives and policies that seek rural land use diversification, revenue producing activities that support the long term sustainability of rural areas, and provision for visitor accommodation which is well designed and suitably located, and enables landscape values and biodiversity to be sustained in the long term. This is for the same reason as above, i.e. the high cost and uncertainty associated with a fully discretionary resource consent process.

7.14 Option 2 has higher costs, and less ‘guaranteed’ benefits than Option 1 and the fully discretionary consenting regime is less efficient. The only real benefit of Option 2 is that the Council retains more control over future accommodation proposals, including management of effects in an ONL. However, I am confident that the proposed rules framework for the subzone, in combination with the existing Rural Zone provisions which will still apply, is more than adequate to manage effects.

7.15 I acknowledge that the Council does not favour small ‘spot’ zones. That is not what is proposed here. The proposed subzone rules package is designed so that can apply to other appropriate locations in the Rural Zone (with site specific modifications as appropriate), in the same way that the residential zones VA overlay applies to multiple locations. It could provide a ‘template’ which replaces the ODP Rural Visitor Zones (a Stage 3 matter).

7.16 I have concluded that overall, Option 1 is more effective and more efficient.

## 8. PART 2 OF THE RMA

8.1 As a number of the relevant PDP objectives and policies are subject to appeal (marked in red in **Appendix G**) so are not settled, it is also relevant to consider whether the proposed subzone is consistent and gives effect to Part 2. In my opinion it clearly does for the following principal reasons:-

- it provides a more enabling planning framework than the 'status quo' of retaining VA as a fully discretionary activity and the PDP more restrictive limits on Residential Visitor Accommodation and Homestays consistent with the enabling approach of s5<sup>2</sup>. This is not at the expense of environmental effects, as the development restrictions and restricted discretionary assessment matters will ensure appropriately sized, located and designed development which implements the PDP objectives and policy framework, including with respect to the ONL;
- Section 6b), and h)<sup>3</sup> matters apply and are addressed by the expert evidence. - Development will be reasonably difficult to see and will not inappropriately affect visual amenity or landscape character and any natural hazard risks can be managed, with natural hazards being a matter of discretion for restricted discretionary applications within the subzone;
- Section 6c)<sup>4</sup> does not 'technically' apply as the subzone does not include any SNAs. However, the subzone rules provide for protection, restoration and enhancement of indigenous vegetation.
- Sections 7b), 7c) and 7f)<sup>5</sup> apply. The subzone will enable a more efficient use of the land resource by enabling farm diversification and a second income source which will enable

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<sup>2</sup> 5 (1)The purpose of this Act is to promote the sustainable management of natural and physical resources

(2)In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural well-being and for their health and safety while—

(a)sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and

(b)safeguarding the life-supporting capacity of air, water, soil, and ecosystems; and

(c)avoiding, remedying, or mitigating any adverse effects of activities on the environment.

<sup>3</sup> s6(b) the protection of outstanding natural features and landscapes from inappropriate subdivision, use, and development

s6(h) the management of significant risks from natural hazards

<sup>4</sup> s6(c) the protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna

<sup>5</sup> s7b the efficient use and development of natural and physical resources

the property to be more economically viable than the current 'uneconomic' low level leased grazing use. The evidence establishes that any effects on amenity values and the quality of the environment will be appropriately managed through the restricted discretionary resource consent process.

## 9. COUNCIL PLANNER'S REPORT

### **Rosalind Devlin Evidence in Chief** (dated 10 August 2018) **and Rosalind Devlin Supplementary Evidence** (dated 10 August 2018)

9.1 Ms Devlin's Evidence in Chief outlines the Visitor Accommodation s32 Evaluation parameters to be used when identifying where to locate VASZ across the District. The context is a section 32 assessment dated October 2017 of the existing ODP VASZs which apply exclusively to residential zones, ranging from single land parcels to large undeveloped areas spanning a number of different zones, some of which are no longer used for visitor accommodation purposes. These are completely different scenarios to that proposed by the Trust submission i.e. a new rural and ONL based VASZ on a large 'vacant' farm block which currently has not viable economic use. Clearly, the parameters are not directly, if at all, applicable in a rural context. Notwithstanding, my comments on the parameters, as they may apply to the proposed Upper Glenorchy VASZ ('the subzone') are as follows:-

*(a) Generally prevent very small sub-zones or single parcel subzones which result in 'spot-zoning';* - the Trust Site comprises 256 ha in 6 titles. It is a substantial property, larger than the neighbouring Rural Visitors Arcadia Zone, or other rural based site specific zones that provide for visitors accommodation (e.g. Walter Peak).

*(b) Prevent and remove small sub-zones where they do not reflect the existing land use (for example, a site that has been developed for residential purposes);* - as noted above the Trust Site is substantial in size. There is no existing development on the Site, which is leased to neighbouring farmer for low level grazing purposes which does not generate an economic return. There is no economically sustainable 'permitted' activity for the Site under the ODP or PDP provisions. The proposed subzone proposes a more enabling consenting regime

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S7c) the maintenance and enhancement of amenity values  
S7f) maintenance and enhancement of the quality of the environment

for Visitor Accommodation which enables visitors to stay in and appreciate the Upper Glenorchy ONL and includes suitable restricted discretionary controls to ensure the protection, maintenance and enhancement of landscape, visual amenity and biodiversity values. It is consistent with the PDP objectives and policy framework, including Strategic Objectives 3.2.1.8 (The development of a prosperous, resilient and equitable economy in the District) ; 3.2.5.1 (The retention of the District's distinctive landscapes); 3.3.21, 3.3.25 and 3.3.30 (Rural Activities).

*(c) Prevent and remove small sub-zones where these are historic and are now considered inappropriately located for visitor accommodation activities (for example, semi-rural locations where a former motel has been demolished but the site has not been redeveloped);* Not relevant

*(d) Retain or reinstate sub-zones that apply to large areas in appropriate locations, whether developed or not (for example, the large Fernhill sub-zones);* Not directly relevant, but establishes the principle that VASZs can provide, in appropriate locations, for new rather than just existing visitor accommodation.

*(e) Retain or reinstate sub-zones that reflect existing lawfully established visitor accommodation activities where the underlying zone would create future non-compliances for substantial existing businesses (for example, established motels in the Lower Density Suburban Residential zone where activities would become non-complying).* Not relevant

9.2 Ms Devlin's supplementary evidence considers whether it would be appropriate for a VASZ to be added to the Site, as an overlay over the Stage 1 confirmed Rural Zone and ONL.

9.3 Ms Devlin correctly confirms that the PDP Rural Zone does not contain any VASZs and associated provisions. My understanding is that this is because the ODP approach to provide for rural visitor facilities including visitor accommodation by way of a specific zone – the Rural Visitor Zone – has not yet been considered in the PDP. This will be a Stage 3 matter. Earlier advice from the Planning Policy Manager was that “*if a Rural Visitor zone is notified in Stage 3 people may submit on this variation seeking to amend it and apply it in other places*”<sup>6</sup>. However, the Hearings Chair has since ruled<sup>7</sup> that the Visitor Accommodation Variation does not provide an opportunity for submitters to re-challenge

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<sup>6</sup> Email advice 13/4/18

<sup>7</sup> 2<sup>nd</sup> Procedural Minute on Decisions not on the PDP 2 August 2018

zonings applied in Stage 1. Presumably the same will apply with respect to the Rural Visitors Zone (if this is retained in the same or some other form at Stage 3).

9.4 With respect to Homestays and Residential Visitors Accommodation, Ms Devlin relies on Ms Bowbyes' s42A report which recommends that these activities remain discretionary throughout the Rural Zone. However, Ms Bowbye's recommendation was with respect to the status of these activities in the wider Rural Zone, not as part of a proposed VASZ for the Trust Site.

9.5 With respect to the proposed subzone, Ms Devlin notes that the Trust submission does not include enough detail for her to consider whether the proposed approach would be consistent with the PDP. Full details of the proposed subzone have been provided in the Trust hearing evidence including:-

- PDP proposed rules, including restricted discretionary assessment matters (to be inserted as Rule 21.19) and other consequential amendments;
- Expert evidence and advice relating to landscape effects, natural hazards and servicing which establishes which parts of the Site are physically suitable for development, and combines this with landscape advice to determine 'in principle' suitable locations and forms for development;

9.6 This planning evidence which establishes that the proposed subzone sits comfortably within and implements the PDP objective and policy framework, including the higher order Strategic Directions. I agree with Ms Devlin<sup>8</sup> that in respect of existing VASZ's:

*"...the matters of discretion ...have greater relevance to urban environments, where noise and other potential adverse effects on neighbours can arise. The Teece site is rural and remote, with many of the matters of discretion being of limited relevance.*

9.7 It is for that reason that specific matters of discretion are proposed for this rural based Site. These matters may provide the basis for a replacement Rural Zone VASZ to be applied at Stage 3 to replace the ODP Rural Visitor Zones. In my opinion, a Rural Zone VASZ would be more appropriate and consistent with the structure of the PDP for the residential zones, than retaining the ODP Rural Visitor Zones in their current form. The existing ODP Rural Visitor Zones, are also, as with the Teece site, generally in remote rural locations with high natural values. It has the advantage that the underlying Rural Zone provisions, including the objective and policy framework still apply to the Rural VASZ. Also, 'generic' assessment

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<sup>8</sup> Paragraphs 3.5-3.6 of Devlin Supplementary Evidence

matters which apply to all Rural Zone VASZs is less complex and more user friendly PDP structure, and thus more efficient.

9.8 I disagree with Ms Devlin's conclusion that *"the PDP direction is that RVA and Homestays are a more appropriate outcome for the Rural Zone than a VASZ, in terms of maintaining landscape quality, character and visual amenity, in accordance with strategic policy 3.3.21, and that visitor accommodation within the Teece site should remain as a Discretionary Activity, in accordance with Chapter 21"*.

9.9 In reaching this conclusion Ms Devlin makes the following comments with respect to the policy framework:-

*In regard to the appropriateness of a VASZ and provisions (bespoke or otherwise) for the Teece site, I take guidance from the strategic directions chapters of the PDP, as referenced in the Hearing Panel Report 4B:*

*Looking at the Strategic Policies (in Chapters 3 and 6), it is clear that the provision for visitor accommodation outside the urban areas is contemplated only where they would protect, maintain or enhance landscape quality, character and visual amenity values.*

9.10 She refers in particular to Strategic Policy 3.3.1 and 3.2.5.1 which read as:

*Make provision for the visitor industry to maintain and enhance attractions, facilities and services within the Queenstown and Wanaka town centre areas and elsewhere within the District's urban areas and settlements at locations where this is consistent with objectives and policies for the relevant zone.*

*The landscape and visual amenity values and the natural character of Outstanding Natural Landscapes and Outstanding Natural Features are protected from adverse effects of subdivision, use and development that are more than minor and/or not temporary in duration.*

9.11 Policy 3.3.1 is not an 'exclusive' policy with respect to Visitor Accommodation i.e. it is not stating that VA should only be provided in the specified urban and settlement areas. To do so would be in conflict with the following Strategic Policies:-

*3.2.1 The development of a prosperous, resilient and equitable economy in the District.*

*3.2.1.1 The significant socioeconomic benefits of well designed and appropriately located visitor industry facilities and services are realised across the District.*

*3.2.1.8 Diversification of land use in rural areas beyond traditional activities, including farming, provided that the character of rural landscapes, significant nature conservation values and Ngāi Tahu values, interests and customary resources, are maintained.*

*3.3.21 Recognise that commercial recreation and tourism related activities seeking to locate within the Rural Zone may be appropriate where these activities enhance the appreciation of landscapes, and on the basis they would protect, maintain or enhance landscape quality, character and visual amenity values.*

9.12 The above clearly contemplate visitor industry facilities and services/tourism related activities, of which Visitor Accommodation is a key component, in appropriate locations “*across the District*”. This includes in rural areas, where they can be a means of facilitating diversification of land uses and the rural economy, consistent with the development of a prosperous, resilient and equitable economy (Objective 3.2.1),

9.13 Ms Devlin also refers to Assessment Matter 21.21.1.1 (ONF and ONL):-

*In applying the assessment matters, the Council will work from the presumption that in or on Outstanding Natural Features and Landscapes, the applicable activities are inappropriate in almost all locations and that successful applications will be exceptional cases where the landscape or feature can absorb the change and where the buildings and structures and associated roading and boundary changes are reasonably difficult to see from beyond the boundary of the site the subject of application.*

9.14 This reflects Policy 6.3.1.1:-

*Policy 6.3.1.3 Policy – That subdivision and development proposals located within the Outstanding Natural Landscape, or an Outstanding Natural Feature, be assessed against the assessment matters in provisions 21.7.1 and 21.7.3 because subdivision and development is inappropriate in almost all locations, meaning successful applications will be exceptional cases.*

9.15 The evidence establishes that the landscape of the Teece Site, which is within an ONL, can absorb appropriately designed and located visitor accommodation which will be reasonably difficult to see. A rules package is proposed to ensure that such development will protect, maintain or enhance landscape quality, character and visual amenity values, consistent with Policy 3.3.21.

9.16 Policy 6.3.1.3 states that development in the ONL is inappropriate in almost all locations and successful applications will be exceptional cases. Notwithstanding this strong policy stance,

Visitor Accommodation is a discretionary not a non complying activity in the Rural ONL. As a general 'rule of thumb' it is my understanding that discretionary activities are generally anticipated in a zone, but not necessarily on every site. They require a site to site assessment, with the ability to impose site specific consent conditions. Non complying activities, in contrast, are not generally contemplated by the zone, and therefore must pass the s105D 'threshold tests', one of which is that the proposal is not contrary to the District Plan objectives and policies. The discretionary status of VA indicates to me, that notwithstanding Policy 6.3.1.3, VA is anticipated in the ONL in appropriate locations and in a manner where it implements the PDP objectives and policies.

## **10. CONCLUSION**

10.1 The proposed Upper Glenorchy Visitors Accommodation subzone applies to a 278 ha site in a relatively remote 'wilderness experience' area within an ONL which currently has no viable economic use. It provides a more enabling consenting framework for VA in a location where the ONL can absorb suitably scaled and designed development. It is more effective and efficient than the notified provisions which propose that the status of VA remains as fully discretionary and RVA and Homestays are subject to restrictions for reasons that essentially apply to the Council's urban areas only.

**Appendix A** Further submissions on various other submissions on the PDP Stage 2 residential visitors accommodation and homestay provisions

**Appendix B** Plans of the sought areas of UGVASZ

**Appendix C** Recommended rules and assessment matters

**Appendix D** Aerial photograph of site

**Appendix E** Consulting Ltd Report

**Appendix F** Infrastructure Feasibility report

**Appendix G** Assessment of the VASZ against the relevant PDP objectives and policies.

**Appendix H** Comparative cost benefit analysis of the proposed VASZ

**Appendix A**  
**Further submissions on various other submissions on the PDP Stage 2**  
**residential visitors accommodation and homestay provisions**

**Teece Irrevocable Trust No. 3 – Further Submissions on Stage 2 – Variation - Visitor Accommodation**

Submitter Name	Submitter Number	Support/Oppose	Reasons	Decision Sought
Judith and Martin Bryant	2057.1	Support	The Visitor Accommodation Variation is not consistent with the Resource Management Act (RMA) 1991 in particular Part 2 and section 32	The Visitor Accommodation Variation be withdrawn in its entirety.
Judith and Martin Bryant	2057.8	Support	<p>1) The need to place more restrictive provisions on residential visitor accommodation and homestays in order to address stated negative effects associated with these activities i.e. because it <i>“removes dwellings from the general housing pool for families and workers (including seasonal workers), adds to the district’s issues with affordable housing, and can affect the settled character of residential neighbourhoods”</i> does not apply to the Rural Zone,</p> <p>2) The Section 32 Evaluation Report in support of the Stage 2 Variation – Visitors Accommodation sought is inadequate and incomplete and inconsistent with the RMA</p>	Agree that the discretionary activity status for Residential Visitor Accommodation and Homestay activities that require resource consent in the Rural Zone be opposed.

Michael Harvey	2058.8	Support	As above	As above
Sally Watson	2067.8	Support	As above	As above
Aimi Smith-Taylor	2068.8	Support	As above	As above
Alexander Hopkinson	2069.8	Support	As above	As above
Cam Pyke	2070.8	Support	As above	As above
Catherine McLennan	2071.8	Support	As above	As above
Jan and Tim Warwick	2072.8	Support	As above	As above
Lindsay Lake	2073.8	Support	As above	As above
Lynne Fleming	2074.8	Support	As above	As above
Rachel Kane-Smith	2075.8	Support	As above	As above
Patricia Thomson	2080.8	Support	As above	As above
Jessica Carr	2081.8	Support	As above	As above
Gemma Ansty	2082.8	Support	As above	As above
Louise Hall	2092.8	Support	As above	As above
Trineka Newton	2093.8	Support	As above	As above
James Anderson	2111.8	Support	As above	As above
Juan Llona	2112.8	Support	As above	As above
Oanita Collins	2114.6	Support	As above	As above
Danelle Jones	2117.6	Support	As above	As above
Virginia Brown	2119.6	Support	As above	As above
Anne Percy	2179.6	Support	As above	As above
Colleen Morton	2180.6	Support	As above	As above
Adrienne Kendall	2396.5	Support	As above	As above
Judy Murphy	2565.8	Support	As above	As above
Maurice Joseph Murphy	2583.6	Support	As above	As above
Kate Craighbrown	2588.6	Support	As above	As above
George Bridgewater	2011.10	Support	As above	Agree that Discretionary Status of Rule 21.5 - visitor

				accommodation rule standards in the Rural Zone – Discretionary Status be opposed.
Rachel Bridgewater	2012.10	Support	As above	As above
Jamie Roy	2141.1	Support with respect to Rural zone	As above	The status quo visitor accommodation rules remain or a regime be proposed in which visitor accommodation activities are made restricted discretionary activities in Rural Zone and that non-notification provisions be provided for where applications adequately address matters of discretion.
Lisa Schmidt	2149.1	Support with respect to Rural zone	As above	Retain the operative visitor accommodation rules or visitor accommodation in the Rural Zone is restricted discretionary and provided for as non-notified where matters of discretion are adequately addressed in resource consent applications.
Bookabach Ltd	2302.72	Support	As above	Rural Zone provisions for visitor accommodation be amended in regard to non-notification to include an additional rule stating that proposals for restricted discretionary resource consent for Residential Visitor Accommodation and Homestays will be processed on a non-notified basis

Cardrona Alpine Resort Limited	2492.8	Support with respect to Rural zone	As above	Within the Rural zone, Visitor Accommodation (activity and development) should be provided for as a permitted or controlled activity (subject to standards) or otherwise as a restricted discretionary activity
Shane Melton	2006.4	Agree with respect to Rural zones	As above	Rural areas be exempt from the visitor accommodation rule
Streat Developments Ltd	2311.1	Support	The addition of a Strategic Objective and enabling policies as proposed recognises the importance of tourism and support services including visitor accommodation to the economic and social wellbeing of the District, in accordance with Part 2 of the RMA	A Strategic Objective and enabling policies recognising the contribution visitor accommodation makes to the economic well being of the District be added to Chapter 3 – Strategic Directions.
Rosie Simpson	2018.1	Support	The Visitor Accommodation Variation is not consistent with the Resource Management Act (RMA) 1991 in particular Part 2 and section 32	That the Visitor Accommodation Variation be rejected and other alternatives be considered.

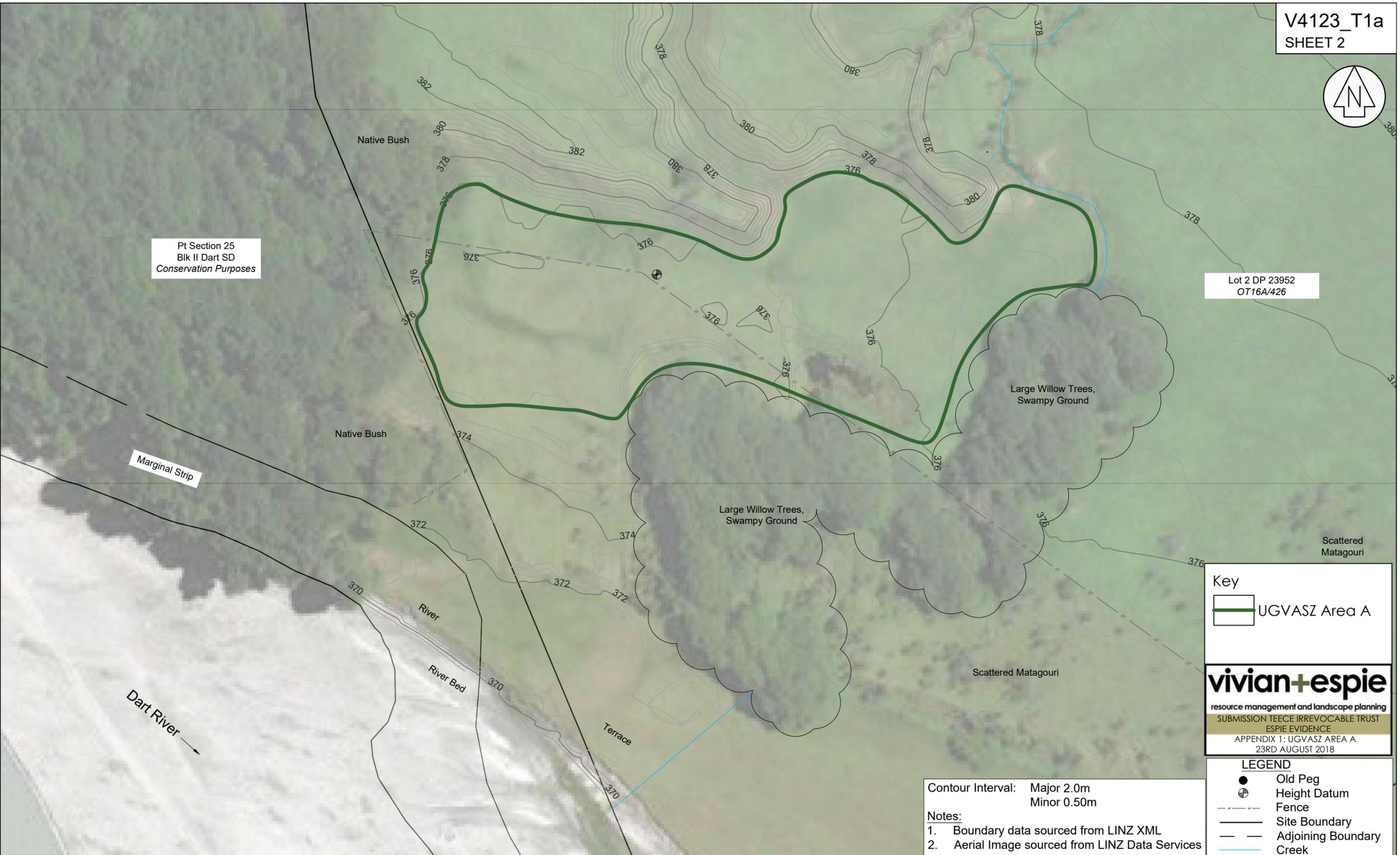
## **Appendix B**

### **Plans of the sought areas of UGVASZ**



Pt Section 25  
Blk II Dart SD  
Conservation Purposes

Lot 2 DP 23952  
OT16A/426



**Key**

UGVASZ Area A

**vivian+espie**  
resource management and landscape planning  
SUBMISSION TEECE IRREVOCABLE TRUST  
ESPIE EVIDENCE  
APPENDIX 1: UGVASZ AREA A  
23RD AUGUST 2018

**LEGEND**

- Old Peg
- Height Datum
- Fence
- Site Boundary
- Adjoining Boundary
- Creek

Contour Interval: Major 2.0m  
Minor 0.50m

**Notes:**

- Boundary data sourced from LINZ XML
- Aerial Image sourced from LINZ Data Services

**SOUTHERN LAND**  
SURVEYING | PLANNING | LAND DEVELOPMENT

REVISION	DESCRIPTION	DATE
A	ORIGINAL ISSUE	22/08/18

**TOPOGRAPHIC SURVEY OF LOT 2 DP 23952  
Glenorchy-Paradise Road**

PREPARED FOR				SCALE
Teece Irrevocable Trust No. 3				1:1000 @ A3
DATE				DATUM & LEVEL
SURVEYED	21/08/18	CHECKED	22/08/18	Mount Nicholas 2000
GL		AJ		LEVEL IN TERMS OF GPS Derived
				ORIGIN OIT XI SO 20764 RL = 386.82
DRAWN				DRAWING REFERENCE
GL	22/08/18	APPROVED	22/08/18	V4123_T1
				REVISION
				A

Key



UGVASZ Area B



**Appendix C**  
**Recommended rules and assessment matters**

**Upper Glenorchy Visitors Accommodation Sub-Zone**

21.7 Rules and Standards for Buildings

Table 1 Activities – Rural Zone

Page 21.12 Amend the following Rule as follows:

	<b>Activities and Rural Zone</b>	<b>Activity Status</b>
21.4.19	Visitor Accommodation outside of a Ski Area Sub-Zone and the Upper Glenorchy Visitors Accommodation Sub-Zone	D

Table 4 Standards for Structures and Buildings

Page 21 -18 & 21 -19 Amend the following Rules as follows:

	<b>Table 4 – Standards for Structures and Buildings The following standards apply to structures and buildings, other than Farm Buildings.</b>	<b>Non-Compliance Status</b>
21.7.3	Building size The ground floor area of any building must not exceed 500m <sup>2</sup> . Except this rule does not apply to buildings specifically provided for within the Ski Area Sub-Zones <b>and the Upper Glenorchy Visitors Accommodation Sub-Zone</b>	RD Discretion is restricted to: a. external appearance; b. visual prominence from both public places and private locations; c. landscape character; d. visual amenity; e. privacy, outlook and amenity from

		adjoining properties
21.7.4	Building Height The maximum height shall be 8m. <b>Except this rule does not apply to buildings specifically provided for within the Upper Glenorchy Visitors Accommodation Sub-Zone.</b>	RD Discretion is restricted to: a. rural amenity and landscape character; b. privacy, outlook and amenity from adjoining properties; c. visual prominence from both public places and private locations
21.7.6	<b><u>The maximum total building footprint for all development identified in Area A – Planning Map 6 &amp; 9, inclusive of all activities shall be 2,000m<sup>2</sup>. The maximum building height for all development identified in Area A shall be 5.5m</u></b>	Discretionary
21.7.7	<b><u>The maximum total building footprint for all development within Area B - Planning Map 6 &amp; 9 shall be 400m<sup>2</sup> and shall have a maximum height of 5.5m.</u></b>	Discretionary

**Table 19 – Upper Glenorchy Visitors Accommodation Sub-Zone**

Page 21-33 Add

**21.19 Rules – Upper Glenorchy Visitors Accommodation Sub-Zone**

	<b><u>Table 19 – Activities in the Upper Glenorchy Visitor Accommodation Sub-Zone Additional to those activities listed in Table 1.</u></b>	<b><u>Activity Status</u></b>
<b><u>21.19.1</u></b>	<b><u>One residential unit which includes a single residential flat and any other accessory buildings as identified within Area A of Planning Map 6</u></b>	<b><u>Restricted Discretionary</u></b>

	<p><b>Discretion is limited to:-</b></p> <ul style="list-style-type: none"> <li>a. <b><u>location, external appearance, size and colour of buildings</u></b></li> <li>b. <b><u>visual prominence from both public places and private locations</u></b></li> <li>c. <b><u>associated earthworks, access, parking and landscaping</u></b></li> <li>d. <b><u>provision of water supply, sewage treatment and disposal, electricity and telecommunication services (where necessary)</u></b></li> <li>e. <b><u>lighting</u></b></li> <li>f. <b><u>natural hazards (including tree windfall)</u></b></li> <li>g. <b><u>indigenous vegetation clearance, restoration and enhancement</u></b></li> <li>h. <b><u>traffic where the combined traffic movements for all activities excluding farming exceed 50 vehicle movements per day</u></b></li> </ul>	
<b><u>21.19.2</u></b>	<b><u>Residential Visitor Accommodation within Area A of Planning Map 6 &amp; 9</u></b>	<b><u>Permitted</u></b>
<b><u>21.19.3</u></b>	<b><u>Homestay within Area A of Planning Map 6 &amp; 9</u></b>	<b><u>Permitted</u></b>
<b><u>21.19.4</u></b>	<b><u>Any Visitor Accommodation Units and associated manager's residence within Area A &amp; B of Planning Map 6 &amp; 9 - Discretion is limited to the matters set out under 21.19.1 above</u></b>	<b><u>Restricted Discretionary</u></b>

Rule 21.20 Rules Non-Notification of Applications

Add under 21.20.3 the following:-

**21.20.4 Restricted discretionary activity Residential Unit and Visitor Accommodation in the Upper Glenorchy Visitor Accommodation**

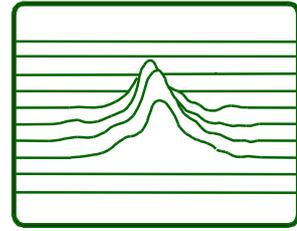
Amend Planning Map 6 & 9 as below:-

**Overlay the Upper Glenorchy Visitor Accommodation Subzone to the Teece Irrevocable Trust No. 3 property legally described as Lots 1, 2 and 3 DP23952; Lots 4 and 6 DP24043; Part Sections 16, 17, 18, 19, 20, 21, 22 and 23 Block II Dart Survey District (SO404); and Sections 40 and 48 Block II Dart Survey District (SO404) and as shown on Amended Planning Map 6 & 9 (subject to Council redrafting).**

**Appendix D**  
**Aerial photograph of site**



**Appendix E**  
**Geotech Report**



14 August 2018

Vivian & Espie

P.O. Box 2514

Wakatipu

Cc. Fiona Aston, Aston Consultants

Attn. Ben Espie

Dear Ben:

## **Hazard Assessment: Mill Flat, Glenorchy-Paradise Road**

### **1. Introduction**

We have undertaken a hazard assessment of the above portion of land according to your instructions of 14 August 2018 and brief received in email dated 09 August. The scope of the investigation was to gain an understanding of geomorphic processes and likely hazards pertaining to the proposed development to determine the suitability of the site and whether any intervention is required to manage the risk. This report describes the investigations undertaken and the implications towards the development.

On this site, it is proposed to develop visitor accommodation comprising a homestead and lodge (or cluster of buildings) to the west of the road and five cabins in the bushed area east of the road. The land is held in a number of different parcels that form part of Arcadia Station, a stock run extending between Mt Aspiring National Park and Diamond Lake on the east side of the Dart Valley. Figure 1 shows an aerial view of the area of interest with the homestead and lodge identified as "A" and the general area of the cabins identified by "B". Photo 1 shows a view of the east side of the valley from Area "A".



*Photo 1: View looking east from Area A to Area B in bushed alluvial fan in middle distance.*

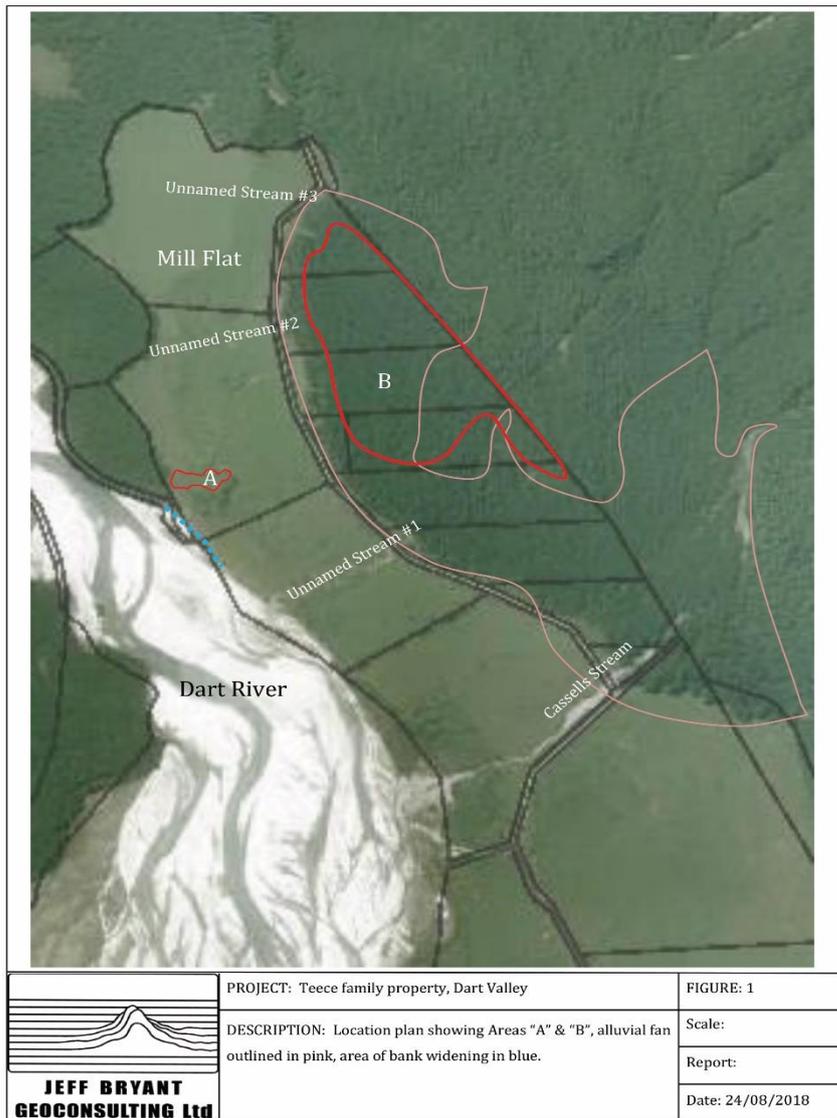
## **2. Site Description**

The general area of interest occupies essentially flat land on the Dart Valley floor. Much of the area comprises pastoral land covering low lying terraces extending between the road and the Dart River flood plain to the south and a low, bush covered ridge to the north. The remaining area covers a bush-covered composite fan extending from the road to the Lower Dart Conservation Area, the boundary of which runs along the foot of the hills to the east.

Several streams drain the mountains to the east, pass through the bush-covered fan before making their way through the lowermost terraces to join with the Dart. Cassells Stream flows along the southern boundary of the area of interest and arises from the largest catchment in the mountains. This stream appears to have a permanent flow but, at the time of visit, this flow had disappeared beneath the flood channel for about 50 m upstream from the road crossing. The second largest catchment gives rise to several small streams which merge into one just within the property boundary and crosses the road, also as a dry channel, about 800 m northwest of Cassells Stream. A third stream crossing, with no apparent catchment but a permanent flow, crosses the road about 1.7 km up valley from Cassells Stream. In addition to these forded crossings, there are ten culverts, one of which carried permanent flow at the time of visit, passing beneath the road between Cassells Stream and the top end of Mill Flat.

The pastoral land is predominantly grassed with only a few shelter trees, a clump of willows near Area “A” and scattered matagouri bushes. The bushed area surrounding Area “B” is covered in mature beech with minor hardwood (totara, rimu). Some old sawn stumps testify to the past history of milling in this area. The forest is open to grazing and thus most understorey has been either trampled or eaten out apart from a few unpalatable species. The trees seem vulnerable to wind and snow loading as evident from the large number of trunks and branches on the ground.

Figure 1 shows the development areas and features of interest.



### 3. Geomorphology and Geology

The site occupies the lower part of a valley scoured out by the Dart Glacier leaving steep-sided flanks and an ice-moulded, hummocky landscape at lower levels. Thick deposits of outwash gravels infill the valley floor to form Mill Flat and the Dart River flood plain.

The post-glacial period has seen the growth of alluvial fans from a number of side streams which have coalesced to form a composite fan extending from the road to the foot of the higher-standing ground to the east. The streams have cut down into Mill Flat as the Dart River has lowered its base level leaving a series of terraces. The highest terrace forms remnants around the margins of Mill Flat and stands some 4-6 m above the next level of terrace. A similar elevation difference marks the transition from pastoral flat to flood plain although here the slopes range from steep, eroded river bank to gentle gradients such as where Cassells Stream meets the flood plain.

The fan area is a composite of several fans that have coalesced to form a broad feature with an arcuate front around which the road traverses. Slopes within the fan vary from 4-5° around the margins rising to 8-10° where the fan transitions to the hillside. Superimposed on that surface is a micro-relief of channels, most of which have been abandoned and partially infilled. Only four channels show stream flows or signs of recent flow. Photos 2 & 3 show views within the forested fan.

Mill Flat has formed from deposition of alluvial outwash gravels (sandy gravels and cobbles) which are visible on steeper parts of the terrace risers. Capping the gravels is a 1-2 m layer of silty sands deposited as either wind-blown loess or overbank flood sediments. Fan gravels are very similar to alluvial gravels but with more angular particles. Schist bedrock underlies the hills to the east and possibly some of the hummocky terrain rising out of the fan surface. Schist was seen to form outcrops in Cassells Stream near where it forks but thick forest cover elsewhere obscured any other exposures.



*Photo 2: View of northern part of fan where it meets the hillside. Note fallen logs on floor.*



*Photo 3: Unnamed stream #2 near the outer margin of the fan.*

#### 4. Hazard Assessment

The QLDC Hazards webmap identifies the following hazards as affecting the area of interest:

- Liquefaction risk – possibly susceptible
- Alluvial fans – regional scale – floodwater dominated
- Alluvial fans – regional scale – debris dominated

Mill Flat meets some of the requirements for liquefaction susceptibility, namely, recently deposited sediments with elevated groundwater levels. The area is just 40 km southeast from the Alpine Fault, a major zone of seismic activity with the most confident estimates for a large rupture between Haast and Milford Sound being 24-35% in the next 50 years. The susceptibility is lowered, however, by the dominant presence of coarse sediments which are not vulnerable to liquefaction. The threat in Area “A” can be mitigated by a specific design for a building platform.

The area identified by QLDC as being an alluvial fan susceptible to flooding is better described as river flats, the lower parts of which drain the streams arising on the higher standing ground to the east. The low-lying river flats could well be inundated during severe rain storms due to the very low gradient of the channels meandering through the valley floor. However, anecdotal evidence from a long term resident who leases the Teece land suggests that flooding has only been an issue around Cassells Stream to the south. Options to mitigate any flood risk are available, subject to confirmation of levels to determine elevation difference between site and stream. There is also some scope for mitigation by raising the foundation level in conjunction with the measures described for liquefaction mitigation above. These matters would be addressed at consent stage, and it is likely that a hydrologist’s report would be supplied in support of the application.

Land adjacent to the Dart River flood plain could also be lost by gradual lateral erosion or more rapid avulsion where the main channel is abandoned in favour of a new channel to the east of the current flood plain. Google Earth images dating back to February 2006 show a retreat of the river bank just south of Area “A”, most noticeably between 2006 and 2011 with minor, ongoing lateral erosion up to the most recent image (September 2015). The erosion is driven by an eastern flood channel with the main channel remaining more or less in the centre of the flood plain. The limited evidence available suggests that further migration of the flood plain is likely. Avoidance is the best measure to safeguard against lateral erosion and flooding; i.e. selecting a building site

with as much horizontal and vertical separation from the flood plain as is practicable. Within Area A it is recommended that development be subject to topographical/legal survey and a hydrological assessments. Mitigation measures may also be necessary to provide greater certainty over the security of the site.

Debris flows are a potential threat on alluvial fans. The transition from debris dominated and floodwater dominated inundation generally occurs where fan gradients drop below 5°. Recent evidence for minor debris mobilisation was seen in Cassells Stream and Unnamed Stream #1. In both cases, the debris was confined within the flood channel with no overbank deposition. However, more dramatic debris flows have recently occurred at Jordans Creek (2.4 km down valley from Cassells Stream) and an unnamed stream flowing through Dans Paddock (3.8 km up valley). The side streams above the area of interest appear to have stable catchments with minimal erosion suggesting debris flow initiation is not an active process.

Cassells Stream, the largest of the side streams, was found to be confined to one channel but several abandoned channels were visible on the north side. A local quarryman with a concession in DoC land advises that this stream was once level with the surrounding fan about 15-20 years ago. His operations conditions include clearing the flood channel of log jams, an action he attributes to the subsequent entrenchment of the channel some 2-3 m below the general level of the fan (see Photos 6 & 7).



*Photo 6: View of Cassells Stream in mid-reaches of fan showing levee on north bank.*



*Photo 7: Cassells Stream in upper reaches of fan where several levee breaches have occurred prior to channel clearance.*

Whilst the debris flow threat seems to be constrained by channel entrenchment the adjacent fan area may not be entirely immune should a major debris flow occur. Furthermore, channel maintenance by a third party may not continue throughout the

lifespan of the cabins leading to channel infill and subsequent enhanced debris flow threat.

We recommend more detailed investigation to determine the best sites for the proposed cabins. Higher standing ground between active or ephemeral stream channels is preferred to avoid debris flow inundation. Mitigation measures such as training bunds are sometimes appropriate but, in this situation, would require significant destruction of bush and extraction of stream bed gravel which may have unintended consequences.

## **5. Summary and Conclusions**

Mill Flat and the adjacent bushed fan are part of a dynamic environment associated with the southeast margin of the Southern Alps. Two separate developments, namely a homestead/lodge on the western side of Mill Flat and five cabins in the bush clad fan to the east, are proposed. Some minor infrastructure such as roads, tracks and effluent disposal systems will also be necessary.

Area "A" to the west encompasses a flight of terraces, the lowermost ones are poorly drained and subject to flooding from some of the unnamed side streams discharging onto Mill Flat and also subject to widening of the Dart River floodplain. Liquefaction may also be an issue where elevated groundwater levels exist. Buildings within Area A will need further assessment to demonstrate their suitability and to take into account identified risks and the need or otherwise for suitable mitigation. .

Area "B" encompasses the bush covered fan through which a number of permanent or ephemeral side streams flow. The threat of debris flow is best avoided by locating cabin sites on higher standing ground within the fan area. Further investigation is recommended for determining the best sites.

Sincerely,

**Geoconsulting Ltd**

A handwritten signature in black ink, appearing to read 'J. M. Bryant', is written over a light blue horizontal line.

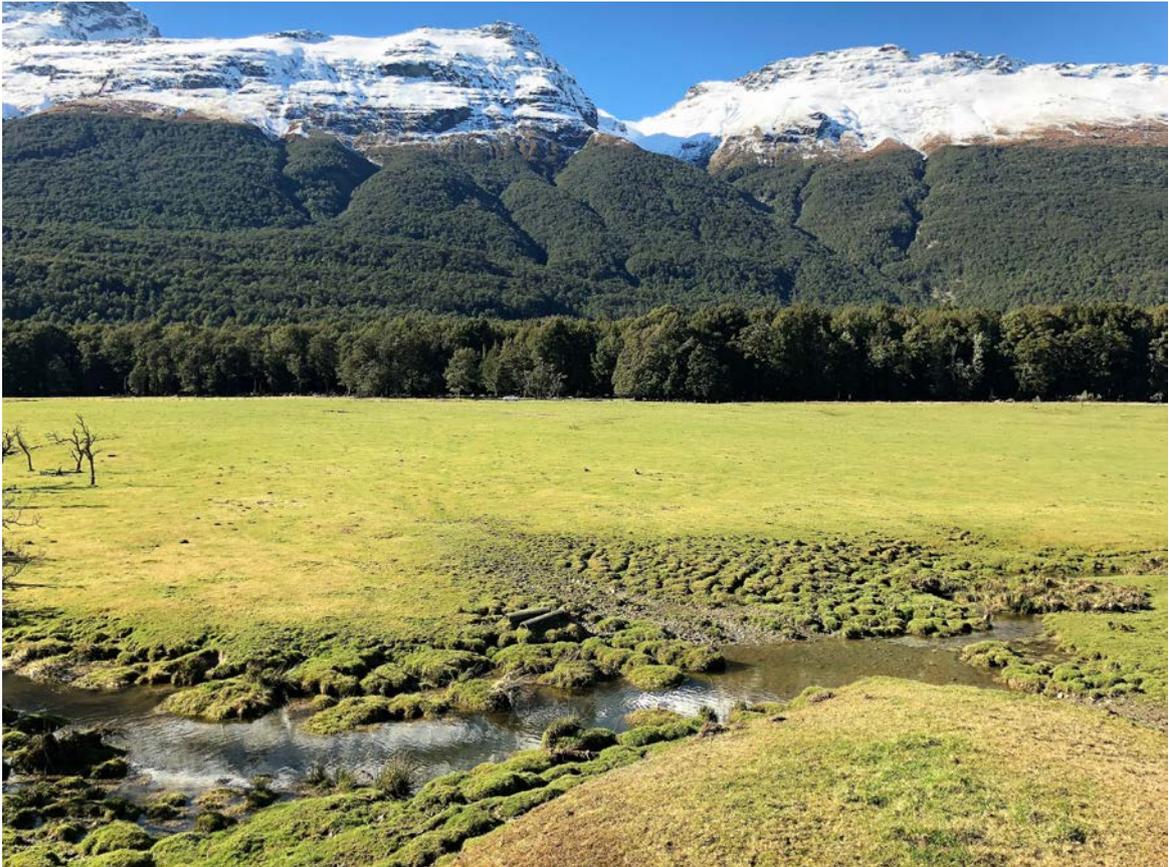
per J.M.Bryant

M.Sc. F.G.S.



**Appendix F**  
**Infrastructure Feasibility Report**

Issue 3  
August 23, 2018



## Teece Irrevocable Trust No 3 – Mill Flat Rezoning

Prepared by:  Civilised Ltd



PO Box 1461  
Queenstown  
Ph 027 223 3036

# Teece Irrevocable Trust No 3 – Mill Flat Rezoning

## Infrastructure Feasibility Report

**Report prepared For:** Teece Irrevocable  
Trust No 3

**Report Prepared By:** John McCartney  
[john@civilised.nz](mailto:john@civilised.nz)

**Report Reference:** QV018  
2018-08-23 Infrastructure Report.docx

**Date:** 23<sup>rd</sup> August 2018

Issue	Details	Date
1	Draft for comment	20 <sup>th</sup> August 2018
2	Revised following feedback	23 <sup>rd</sup> August 2018
3	Revised following feedback	23 <sup>rd</sup> August 2018

## Executive Summary

As part of the current District Plan review by the Queenstown Lakes District Council, Teece Irrevocable Trust No 3 are seeking to rezone part of their land at Mill Flat on the Glenorchy – Paradise Road near Glenorchy. Civilised Ltd have assessed the necessary development infrastructure in relation to:

- Access
- Water supply
- Wastewater disposal

We confirm that it is feasible to provide the necessary development infrastructure to service the proposed rezoned areas.

New accesses from the road network will be required for future development of the areas subject to the rezoning request. Access will come from the existing Glenorchy – Paradise Road and can be designed and constructed to meet the requirements of Queenstown Lakes District Council standards.

It is proposed to develop a new private water supply when the sites are developed. This water will be sourced from either surface water courses on the site and/or the groundwater aquifer underlying the site.

Where suitable road access for fire appliances to the buildings are provided, firefighting water will be provided by a suitable firefighting reserve maintained in a tank in close proximity to each building. Where fire appliance road access is not proposed, a standard approach to fire fighting in back country accommodation will be provided. This will involve ensuring suitable escape paths for occupants and the provision of fire extinguishers to douse small fires.

Wastewater is able to be treated and soaked to ground on site by way of on site wastewater disposal systems. The suitability of the ground for receiving the wastewater flows has been confirmed following observations carried out on site.

# Table of Contents

<b>Executive Summary</b>	<b>i</b>
<b>1 Introduction</b>	<b>1</b>
<b>2 Site Description</b>	<b>1</b>
<b>3 Description of Proposal</b>	<b>1</b>
<b>4 Access</b>	<b>3</b>
<b>5 Water Supply</b>	<b>4</b>
5.1 Water Source	4
5.2 Reticulation Concept	5
5.3 Water Treatment	5
5.4 Fire Fighting Water	5
<b>6 Wastewater Disposal</b>	<b>6</b>
6.1 General	6
6.2 Site Evaluation	6
6.3 Site and Soil Assessment	7
6.4 Conclusions	9
<b>7 Limitations</b>	<b>9</b>
<b>Appendix A</b>	
Proposed Zoning Drawings	

## 1 Introduction

Teece Irrevocable Trust No 3 has engaged Civilised Limited (CL) to investigate and report on the feasibility of providing utility services and the necessary infrastructure for the proposed rezoning of part of their land on the Glenorchy – Paradise Road near Queenstown.

This report considers the nature of the proposed development, the site conditions affecting the implementation of the necessary development infrastructure and describes the proposed implementation of the following elements;

- Access.
- Water supply and internal reticulation.
- Wastewater collection and disposal.

The report is to supplement and support the rezoning submissions made by others on behalf of Teece Irrevocable Trust No 3 with regard to the application to rezone the land.

## 2 Site Description

The proposed rezoning areas are located on land on either side of Glenorchy – Paradise Road. To the east of the road, the land is mature native beech forest that neighbours the Dart Conservation Area and the Mt Aspiring National Park. To the west of the road, the land is grazed farmland generally sloping down towards the Dart River.

The elevation of the site ranges from approximately RL 370 to RL 450m Mean Sea Level (MSL).

There are no buildings currently on the site. The site is not currently serviced with a power supply.

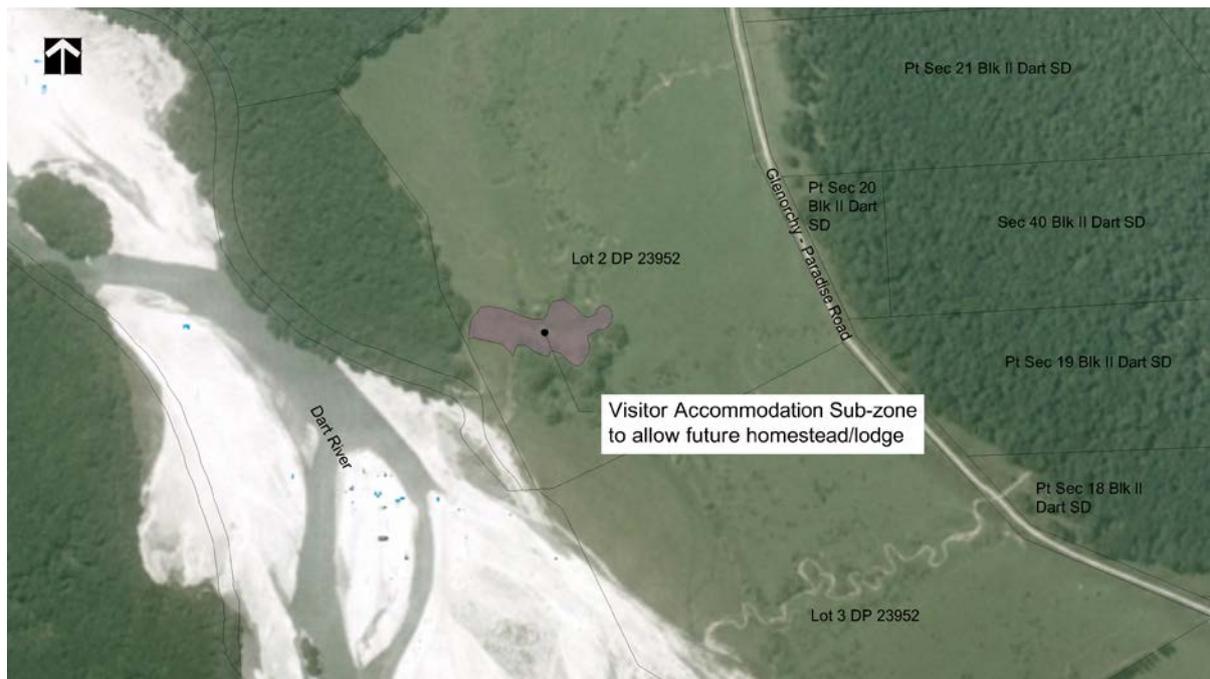
The land receives between 2m and 3m of rainfall per annum and may be subject to drought conditions during the summer months.

## 3 Description of Proposal

The land is currently zoned Rural General under the Queenstown Lakes District Council (QLDC) District Plan. Teece Irrevocable Trust No 3 proposes to rezone two areas of their land to enable some development.

The first rezoned area is to create a visitor accommodation sub-zone for a future homestead/lodge development west of the Glenorchy – Paradise Road. This is on an area of existing farmland at the base of a terrace riser and is set amidst trees and water course near the western boundary of the allotment (Lot 2 DP23952).

**Photo 1: Site of the homestead/lodge**



The second rezoned area is to create a visitor accommodation sub-zone for a total building footprint area of 400m<sup>2</sup> to enable up to five three-bedroomed cabins in the woods type visitor accommodation to be constructed within the native bush area east of the Glenorchy – Paradise Road. This area comprises various allotments legally described as Section 40, Part Sections 16-23 Blk II Dart Survey District.

**Photo 2: Site of the cabins in the woods**



At this stage, no decisions have been made about bringing mains electricity to the site or providing on site power generation facilities. Additionally, whether a significant power supply will be available at the cabins in the woods sites is yet to be determined.

The cabins in the woods have not yet been developed beyond an initial concept, as such it is not yet determined whether vehicular access to the cabins will be provided or whether they will be walk-in back country style accommodation.

We note that this assessment of the development infrastructure is limited to consideration of the scale of the future development as it is currently proposed.

## 4 Access

Development of the rezoned areas will require new accesses from the Glenorchy – Paradise Road. The number and location of these accesses will be dependent upon the final location and layout of the various buildings currently envisaged. It is expected that there will be at least one access on either side of the existing road.

Access to the site could be constructed in a number of locations along the road frontage. One particular location has been assessed in order to prove feasibility and explore the issues associated with providing access to the subject site. This is discussed below.

Subject to detailed design, access to the future homestead/lodge development area may be gained by constructing a new road from an existing farm access point on the Glenorchy – Paradise Road onto the site. The access location assessed is at the current location for the farm access into the paddock which has the site of the proposed zone change area.

The Glenorchy - Paradise Road itself is straight to gently curving and relatively flat in the vicinity of the proposed access.

The current Glenorchy – Paradise Road Reserve is 20m wide and this allows room to create the proposed access to meet the QLDC standards.

Traffic generation projections will depend upon the eventual layout and size of the future buildings on the site. It is anticipated that the new access and intersection with the Glenorchy – Paradise Road may be formed in accordance with the requirements of Diagram 8 contained in Schedule 29.2 of the QLDC Proposed District Plan Stage 2.

Sight distances from the access location on to the Glenorchy – Paradise Road have been assessed in accordance section 29.5.18 of the QLDC Proposed District Plan Stage 2 for a speed limit of 100km/hr. The required sight distance for Residential Activity in a 100km/hr speed environment is 170m and for Other Activities in a 100 km/hr speed environment is 250m. Site inspection has confirmed that

the sight distances are in excess of 250m in both directions and will therefore comply with the design standard. It is also worth noting that the actual speed of vehicles in the vicinity of the development is far lower than the speed limit and as such the sight distance required will be less than noted in the Proposed District Plan Stage 2.

Similarly, access from the existing road to sites on the east side of the road are anticipated to be able to be designed and constructed in accordance with requirements of the QLDC District Plan.

## 5 Water Supply

### 5.1 Water Source

The future development of the site will require a suitable potable water supply. It is envisaged that this will be from either a groundwater source accessed by a water bore or from a surface water source on the site.

During the site visit, several water courses were evident across the site. This included Cassells Stream toward the south of the site and other unnamed creeks at various locations through the site. I note that during my site visit, some of the water courses were not flowing where they crossed the Glenorchy – Paradise Road but I can confirm that upstream within the beech forest the streams were flowing and disperse into the more porous gravels as the slope eases and the creeks get closer to the road.

To the west of the site, the Dart River flows.

Adjacent to the proposed homestead/lodge site, a small stream was flowing at the time of the site visit and appeared relatively permanent.

In order to provide a permanent water supply to the future envisaged developments, the water source will need to be permanent and able to operate during extended dry spells. It is also expected that due to the likely distance between the two envisaged areas of development, separate water sources may be developed for each area.

For the homestead/lodge area, either a water bore drilled into the aquifers underlying the site or a surface water take from a creek that has been monitored during extended low rainfall periods are anticipated to both be able to provide a suitable water source for the future development.

For the cabins in the woods accommodation, a water intake in one of the streams that run through the forested area is anticipated to be able to be implemented to provide a suitable water source.

## 5.2 Reticulation Concept

For a surface water take or a bore located near the proposed homestead/lodge area, the water will be pumped to storage tanks near the proposed buildings. These tanks will provide storage for firefighting and for domestic usage. Water will be boosted into the buildings by a pressure boosting pump.

For the surface water take for the cabin in the woods accommodation, water will be taken from a creek at some height above the proposed buildings. This will be reticulated to the buildings with separate tanks required at each building. Depending upon whether there is a power supply at the cabins, water will be either pumped from the tanks into the buildings or there will be a direct gravity supply to the buildings from the intake.

## 5.3 Water Treatment

Where water is to be sourced from a surface water take, there is the possibility of contamination from animal sources. This can be managed by such measures as ensuring the water intake can be removed or shutoff during heavy rain events to minimise contamination. Furthermore, it is anticipated that the water will be subject to microfiltration at point of consumption.

Due to the possible absence of a suitable power supply, ultraviolet disinfection of the cabins in the woods water may be unable to be carried out. However, with the management control over the stream intake, regular inspections upstream of the intake and microfiltration at the point of consumption, the water supply will comply with best practice for a backcountry water supply.

Where a power supply is available, the treatment is relatively straightforward and it is anticipated that the water supply to the homestead/lodge will be able to fully comply with the Drinking Water Standards for New Zealand (revised 2008).

## 5.4 Fire Fighting Water

At the time that future buildings are established at the homestead/lodge site, a new tank near the proposed building will need to be constructed to serve as a firefighting reserve. This tank should be a minimum of 30,000 litres of which 20,000 litres is to be maintained at all times as a static firefighting reserve. In addition, vehicular access to the tank is to be maintained at all times and a hardstand area constructed adjacent to the tank to allow a fire appliance to park and pump from the tank.

The firefighting supply for the cabins in the woods will be determined as the design of the development progresses. If a suitable vehicular access to the cabins is to be provided, the firefighting will rely on a similar 30,000 litre tank with a 20,000 litre firefighting reserve to the homestead/lodge. This will need to be accessible by a fire appliance.

If a suitable vehicular access to the cabins is not to be provided, then there is no possibility of the Fire and Emergency New Zealand being able to respond to a building fire at the cabins and as such there is no need to provide a water supply to meet the Fire and Emergency New Zealand requirements. The main objective with the fire design of the development then becomes to ensure that all occupants have suitable escape paths from the buildings. In addition, fire extinguishers to douse any small fires that may develop will be provided in all buildings. This approach to firefighting is standard for back country accommodation.

## 6 Wastewater Disposal

### 6.1 General

No community or Council scheme is available for connection in close proximity to the subject site. It is not sustainable to remove waste from site therefore individual on site wastewater disposal (OSWWD) must be examined.

### 6.2 Site Evaluation

#### 6.2.1 General

Component	Description
Assessment Standard	AS/NZS1547:2012
Territorial Authority	Queenstown Lakes District Council
Regional Authority	Otago Regional Council
Purpose	Feasibility of disposal for proposed plan change

#### 6.2.2 Site Description

Component	Description	Reference
Owner	Heritage Ptc LLC	QLDC Website
Location Address	Glenorchy – Paradise Road	Client
Legal Description	Lots 1-3 DP 23952 Lots 4 6 DP 24043 Section 40 Pt Sections 16-23 Blk II Dart Survey District	QLDC Website
Grid Reference	Latitude -45.69572 Longitude 168.344292	Google Maps
General Description	Future homestead/lodge and up to five three-bedroomed cabins in the woods	Client
Wastewater Producing Components	Toilets, Showers, Bathroom Handbasins, Kitchens and Laundry	Client
Number and Size of Lots	No new allotments.	QLDC Website

#### 6.2.3 Site Assessment

Component	Description	Reference
Land Use History	Mix of farmland and untouched native vegetation.	Site visit
Topography	Gently sloping to the south-west	Site visit
Slope Angle	Varies from flat to moderately sloping	Site visit
Aspect	Southwest	Site visit
Vegetation cover	Grass, trees and native beech forest	Site visit
Areas of potential ponding	Existing ponds and flat areas on the farmed areas near the homestead/lodge site	Site visit
Ephemeral streams	Several across the site	Site visit
Drainage patterns & overland flow paths	Sheet flow off the site and into ephemeral and permanent water courses draining to the Dart River	Site visit

Component	Description	Reference
Flood potential	It is known that during extreme events, lower parts of the site (outside the area of the proposed rezoning) may be flooded by the Dart River	Otago Regional Council Hazard Maps
Distance to nearest water body	Varies, water bodies in close proximity to the proposed areas of future development	Site Visit
Water Bores	None currently	Otago Regional Council Water Information GIS
Soil Type	Pd1zU + Di1zU – Paradise, moderately deep, silt loam, undulating and Diamond, shallow, fine sandy loam, undulating	Grow Otago Website
Geological	Holocene fan deposits, loose, commonly angular, boulders, gravel, sand and silt forming alluvial fans, grades onto scree (upslope) and valley alluvium	GNS New Zealand Geology Web Map
Evapotranspiration	Approximately 575 mm/year	Grow Otago Website
Slope Stability	No land instability indicators noted on site	Site visit
Depth to Groundwater	Groundwater during winter is expected to be high and in places at the ground surface	Site visit
Average Rainfall	Between 2000 and 3000 mm/year	Grow Otago Website
Water Supply	On site surface water take or water bore	QLDC Website
Neighbouring systems	On-site disposal in the general area	QLDC Website
Buildings	None	Site Visit
Environmental concerns	Ground freezing in winter	Local knowledge and site visit

### 6.3 Site and Soil Assessment

A site inspection has been undertaken and existing cut slopes on site have been observed.

Component	Description	Reference
Evaluator	John McCartney	
Company	Civilised Ltd	
Date of Investigation	18 <sup>th</sup> August 2018	
Number of test pits	Nil, cut slopes observed	Site visit
Average depth of topsoil	Varies, from 0mm to 300mm	Site visit
Indicative permeability	Varies from low permeability for the loess material to high permeability for the sand and gravels	Appendix B of AS/NZS1547:2012
Soil structure	Weakly structured	Appendix L of AS/NZS1547:2012
Soil category	Varies from Category 1 soils to Category 4 soils	Appendix L of AS/NZS1547:2012
Soil texture	Gravels and Sands to Clay loams	Appendix L of AS/NZS1547:2012
DLR reduction due to slope	Varies, will depend upon future locations	Table M2 of AS/NZS1547:2012
Sensitive receivers	Surface water features and groundwater	Site visit

**Photo 3: Observed cut slope showing alluvial fan deposits consisting of gravels, sands and silts**



**Photo 4: Surface water course and exposed loess soils near the homestead/lodge site**



## 6.4 Conclusions

Based on our site visit and knowledge of the soils, likely loadings and the various on-site wastewater treatment and disposal systems available, we confirm that on-site wastewater treatment and disposal systems may be designed to provide the necessary level of treatment such that the risk of causing significant adverse environmental effects is minimised.

To maintain high effluent quality such systems would require the following;

- Specific design by a suitably qualified professional engineer.
- A requirement that each development area must include systems that achieve the levels of treatment determined by the specific design.
- Regular maintenance in accordance with the recommendations of the system designer and a commitment by the owner of each system to undertake this maintenance.
- Intermittent effluent quality checks to ensure compliance with the system designers specification.
- Siting of disposal fields greater than 50m from any surface watercourse or water bore.

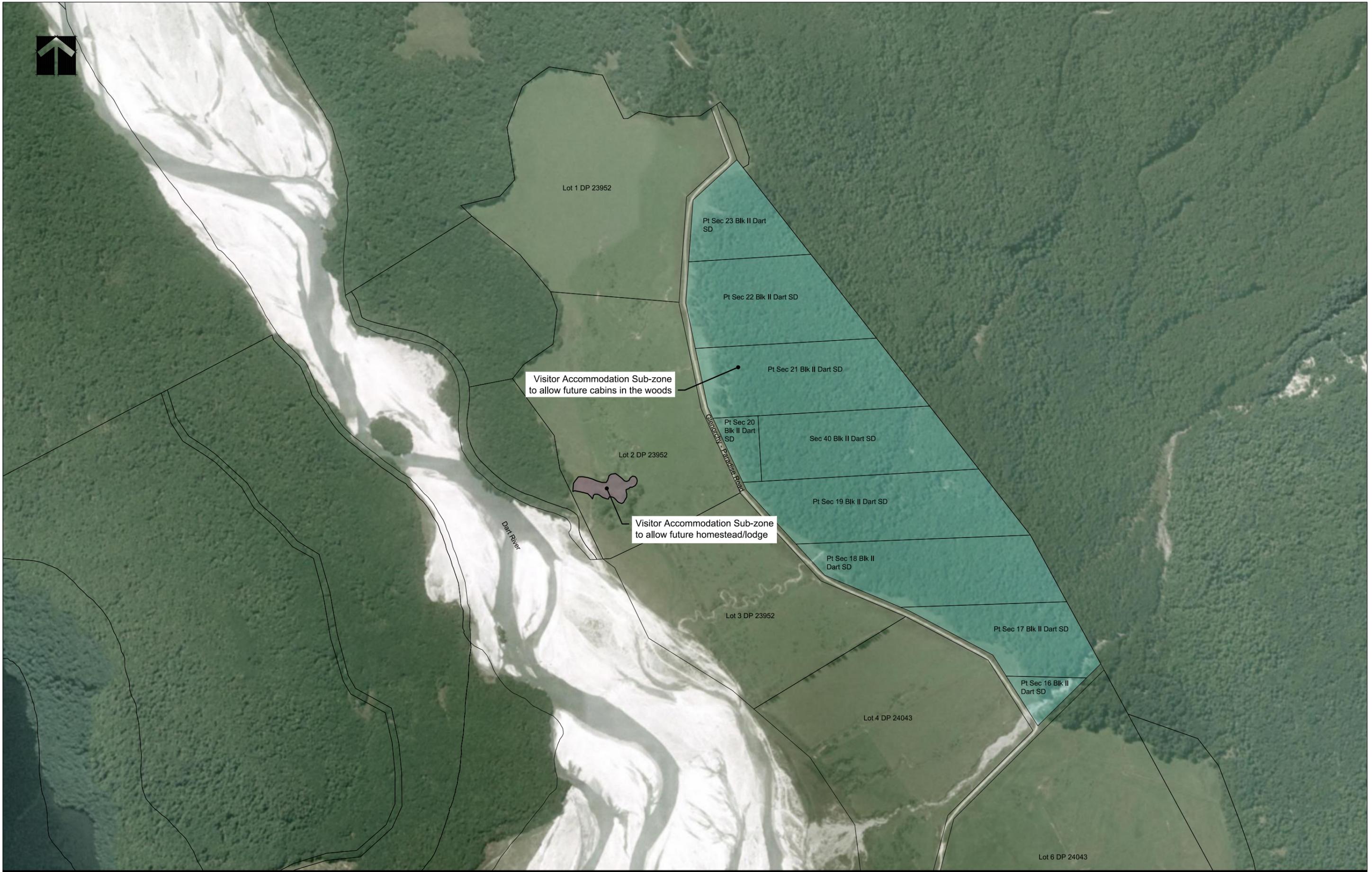
## 7 Limitations

This report has been written for the particular brief to Civilised Ltd from their client and no responsibility is accepted for the use of the report for any other purpose, or in any other context or by any third party without prior review and agreement.

In addition, this report contains information and recommendations based on information obtained from a variety of methods and sources including inspection, sampling or testing at specific times and locations with limited site coverage and by third parties as outlined in this report. This report does not purport to completely describe all site characteristics and properties and it must be appreciated that the actual conditions encountered throughout the site may vary, particularly where ground conditions and continuity have been inferred between test locations. If conditions at the site are subsequently found to differ significantly from those described and/or anticipated in this report, Civilised Ltd must be notified to advise and provide further interpretation.

# Appendix A

## Proposed Zoning Drawings



REV	DATE	DESCRIPTION	APPROVED
A	20/08/2018	Initial Issue	JFM

CONSULTANT



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E: john@mccartneys.nz

JFM	20/08/2018
DESIGN	DATE
JFM	20/08/2018
DRAWN	DATE
JFM	20/08/2018
CHECKED	DATE

CLIENT

**TEECE  
IRREVOCABLE  
TRUST No 3**

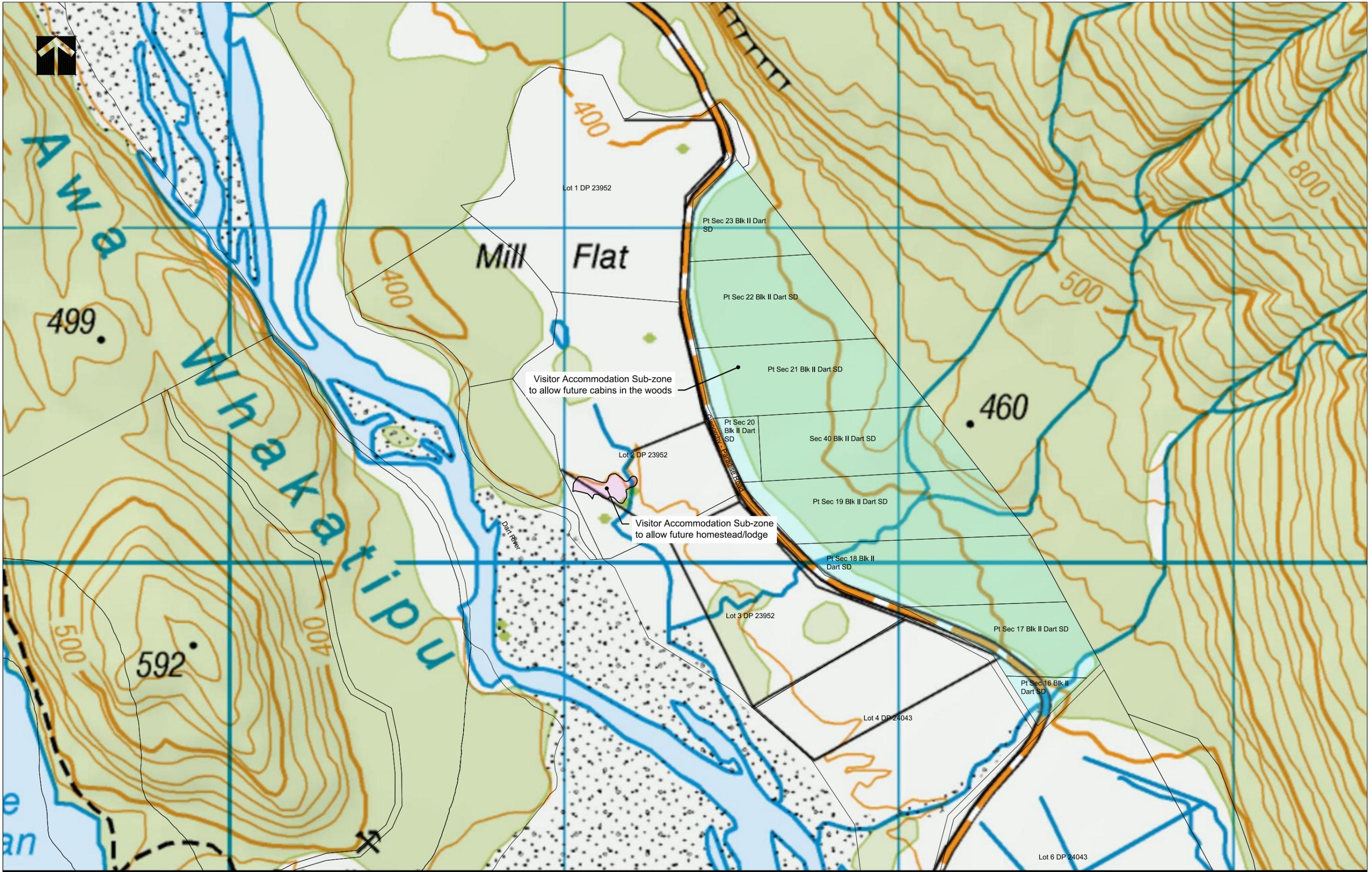
PROJECT/LOCATION

**PROPOSED REZONING  
GLENORCHY - PARADISE ROAD**

TITLE

**SITE PLAN  
AERIAL PHOTOGRAPH**

CONTRACT NUMBER		-
SCALE (AT A3)		<b>1:5000</b>
DRAWING NUMBER	REVISION	
<b>QV018-F-100</b>	<b>A</b>	



REV	DATE	DESCRIPTION	APPROVED
A	20/08/2018	Initial Issue	JFM

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JFM	20/08/2018
DESIGN	DATE
JFM	20/08/2018
DRAWN	DATE
JFM	20/08/2018
CHECKED	DATE

CLIENT

**TEECE  
IRREVOCABLE  
TRUST No 3**

PROJECT/LOCATION

**PROPOSED REZONING  
GLENORCHY - PARADISE ROAD**

TITLE

**SITE PLAN  
TOPOGRAPHIC PLAN**

CONTRACT NUMBER	-
SCALE (AT A3)	1:10000
DRAWING NUMBER	QV018-F-110
REVISION	A

## Appendix G

### Assessment of the VASZ against the relevant PDP objectives and policies.

Nb/ objectives and policies in red are subject to appeal.

#### Chapter 3- Strategic Objectives

*3.2.1 The development of a prosperous, resilient and equitable economy in the District.*

*3.2.1.1 The significant socio economic benefits of well designed and appropriately located visitor industry facilities and services are realised across the District.*

*3.2.1.8 Diversification of land use in rural areas beyond traditional activities, including farming, provided that the character of rural landscapes, significant nature conservation values and Ngāi Tahu values, interests and customary resources, are maintained.*

*3.2.1.9 Infrastructure in the District that is operated, maintained, developed and upgraded efficiently and effectively to meet community needs and to maintain the quality of the environment.*

*3.2.4 The distinctive natural environments and ecosystems of the District are protected.*

Restricting development to only those parts of the Trust site which can 'absorb' development (as identified on amended Planning Map 9) combined with the Restricted Discretionary Activity status and matters of discretion will ensure an appropriately located and well-designed visitor accommodation sub zone that will have positive socio economic benefits, while maintaining the character of the rural landscape; ensuring an appropriate level of servicing and infrastructure which maintains the quality of the environment; and protecting the areas of beech forest on the site.

*3.2.4.1 Development and land uses that sustain or enhance the life-supporting capacity of air, water, soil and ecosystems, and maintain indigenous biodiversity.*

*3.2.4.5 Public access to the natural environment is maintained or enhanced.*

*3.2.5 The retention of the District's distinctive landscapes.*

*3.2.5.1 The landscape and visual amenity values and the natural character of Outstanding Natural Landscapes and Outstanding Natural Features are protected from adverse effects of subdivision, use and development that are more than minor and/or not temporary in duration.*

The evidence submitted in support of the creation of a sub zone establishes that the location can absorb development and that the Restricted Discretionary Activity assessment matters cover all relevant environmental effects and provide a consenting framework which will only facilitate approval for proposals which meet the above 'no more than minor/temporary duration' test. Further, the provision of the sub zone will enable the public enjoy the natural environment of the Trust site and have ready access to recreational amenities of the wider surrounding ONL.

*3.2.6 The District's residents and communities are able to provide for their social, cultural and economic wellbeing and their health and safety.*

The proposed sub zone will provide for the economic well-being of the Applicant, while providing for the social well-being of the District and wider community by providing some local employment opportunities, and diversifying the 'tourism accommodation offering' in the upper Glenorchy area.

### **Chapter 3 - Strategic Policies**

#### *Rural Activities*

*3.3.21 Recognise that commercial recreation and tourism related activities seeking to locate within the Rural Zone may be appropriate where these activities enhance the appreciation of landscapes, and on the basis they would protect, maintain or enhance landscape quality, character and visual amenity values*

*3.3.24 Ensure that cumulative effects of new subdivision and development for the purposes of rural living does not result in the alteration of the character of the rural environment to the point where the area is no longer rural in character*

*3.3.25 Provide for non-residential development with a functional need to locate in the rural environment, including regionally significant infrastructure where applicable, through a planning framework that recognises its locational constraints, while ensuring maintenance and enhancement of the rural environment.*

The proposed subzone provides for tourism related activities (residential visitor accommodation, homestays and visitor accommodation) in a location and manner which protects landscape quality, character and visual amenity values. It enables visitors to stay within and thus be able to more fully appreciate a more remote area with the District's ONL. Only one 'homestead' residential unit is proposed on the 276 ha property which will clearly remain rural in character. As noted in Mr Espies evidence (paragraph 5.11) he does *not*

*consider that a building (or small cluster of buildings) in this location would be an unexpected element or an element that is incongruous in relation to rural settlement patterns.*

## **Landscapes**

*3.3.30 Avoid adverse effects on the landscape and visual amenity values and natural character of the District's Outstanding Natural Landscapes and Outstanding Natural Features that are more than minor and or not temporary in duration.*

The restricted discretionary status for accommodation with supporting provisions which identify the buildable areas and maximum building footprints will control the location, design and visual and landscape effects of development and facilitate a consenting regime which can reject proposals that do not meet the above policy thresholds of 'less than minor or temporary in duration' effects.

## **Chapter 6 – Landscape and Rural Character.**

*6.3.2 Exclude identified Ski Area Sub-Zones and the area of the Frankton Arm located to the east of the Outstanding Natural Landscape line as shown on the District Plan maps from the Outstanding Natural Feature, Outstanding Natural Landscape and Rural Character Landscape categories applied to the balance of the Rural Zone and from the policies of this chapter related to those categories. (3.2.1.1, 3.4.4.4,3.3.21).*

*6.3.5 Ensure that the location and direction of lights does not cause excessive glare and avoids unnecessary degradation of views of the night sky and of landscape character, including of the sense of remoteness where it is an important part of that character.*

The Restricted Discretionary Activity Assessment matters include lighting as a matter for consideration.

*6.3.7 Enable continuation of the contribution low-intensity pastoral farming on large landholdings makes to the District's landscape character.*

The proposal will enable the continuation of low intensity pastoral farming by providing an additional income stream for the property which can supported continued pastoral farming which 'on its own' is not economic.

*6.3.8 Avoid indigenous vegetation clearance where it would significantly degrade the visual character and qualities of the District's distinctive landscapes.*

*6.3.9 Encourage subdivision and development proposals to promote indigenous biodiversity protection and regeneration where the landscape and nature conservation values would be*

*maintained or enhanced, particularly where the subdivision or development constitutes a change in the intensity in the land use or the retirement of productive farmland.*

The proposed provisions would enable up to 400m<sup>2</sup> of built form within the forested area as a restricted discretionary activity, with building and landscape design (including vegetation clearance and ecological enhancement) being subject to discretion.

Evidence submitted in support of the proposal by Ben Espie identifies that in order to accord with the outcomes sought by the PDP, the loss of natural character in the forested area above would need to be balanced. It is Mr Espie's opinion that the proposed provisions (coupled with the other provisions of the PDP) give certainty that a suitable result will be achieved in terms of enhancing the ecological health and value of the forested area.

*6.3.10 Ensure that subdivision and development in the Outstanding Natural Landscapes and Rural Character Landscapes adjacent to Outstanding Natural Features does not have more than minor adverse effects on the landscape quality, character and visual amenity of the relevant Outstanding Natural Feature(s).*

*6.3.11 Encourage any landscaping to be ecologically viable and consistent with the established character of the area.*

*6.3.12 Recognise that subdivision and development is inappropriate in almost all locations in Outstanding Natural Landscapes and on Outstanding Natural Features, meaning successful applications will be exceptional cases where the landscape or feature can absorb the change and where the buildings and structures and associated roading and boundary changes will be reasonably difficult to see from beyond the boundary of the site the subject of application.*

*6.3.16 Maintain the open landscape character of Outstanding Natural Features and Outstanding Natural Landscapes where it is open at present*

An approximately 7500m<sup>2</sup> and 33ha area of VASZ is requested on the area defined in **Appendix B**. The former area occupies a terrace area that sits above the level of the Dart River floodplain but below the level of the surrounding grazed pasture. The latter occupies the northern part of a fan landform that is covered in mature beech forest.

As detailed in Mr Espie's evidence he considers that relatively isolated instances of VA in rural and ONL areas are not discordant with outcome sought by the PDP and do not necessarily degrade landscape character. The location of the proposed VASZ is such that a lodge in this

location will be particularly well absorbed into existing landscape character such that the open pasture, surrounding mountains and broader ONL will very much dominate character. With respect to the forested area Mr Espie is of the view that the proposed provisions (coupled with the other provisions of the PDP) give certainty that a suitable result will be achieved to preserve the character of the area.

## **Chapter 21 – Rural**

*21.2.1 Objective - A range of land uses, including farming and established activities, are enabled while protecting, maintaining and enhancing landscape ,ecosystem services, nature conservation and rural amenity values.*

*21.2.1.5 Have regard to the location and direction of lights so they do not cause glare to other properties, roads, public places or views of the night sky.*

*21.2.1.8 Have regard to fire risk from vegetation and the potential risk to people and buildings, when assessing subdivision and development in the Rural Zone.*

The evidence establishes that the proposed zone restrictions with respect to building location, size etc in combination with the restricted discretionary activity status and assessment matters will protect landscape, natural and rural amenity values. The assessment matters include servicing, which will include assessment of adequate water for firefighting, and appropriate access for emergency vehicles.

*21.2.1.10 Commercial activities in the Rural Zone should have a genuine link with the rural land or water resource, farming, horticulture or viticulture activities, or recreation activities associated with resources located within the Rural Zone.*

*21.2.1.11 Provide for the establishment of commercial, retail and industrial activities only where these would protect, maintain or enhance rural character, amenity values and landscape values.*

The proposed sub zone is directly linked to the rural environment and its wider appreciation. Evidence submitted in support of the proposal confirms that the proposed sub zone will protect and maintain the rural character, amenity and landscape values.

*21.2.1.15 Ensure traffic from new commercial activities does not diminish rural amenity or affect the safe and efficient operation of the roading and trail network, or access to public places.*

As detailed in the Assessment of Effects, the level of traffic will not diminish the rural amenity or affect the safe and efficient operation of the rad network.

*21.2.4.2 Control the location and type of non-farming activities in the Rural Zone, so as to minimise conflict between permitted and established activities and those that may not be compatible with such activities.*

The Site is currently leased for low intensity farming. The proposed sub zone will not create conflict between the established form of farming on site.

*21.2.8 Objective - Subdivision, use and development in areas that are unsuitable due to identified constraints not addressed by other provisions of this Plan, is avoided, or the effects of those constraints are remedied or mitigated.*

The assessment matters tied to the Restricted Discretionary Activity status identifies all known potential effects of development that need to be avoided, remedied or mitigated.

*21.2.9 Objective - Provision for diversification of farming and other rural activities that protect landscape and natural resource values and maintains the character of rural landscapes.*

*21.2.9.1 Encourage revenue producing activities that can support the long-term sustainability of the rural areas of the district and that maintain or enhance landscape values and rural amenity.*

Evidence submitted in support of the proposal identifies that the Site can accommodate the sub zone, while encouraging revenue producing activities.

*21.2.9.2 Ensure that revenue producing activities utilise natural and physical resources (including existing buildings) in a way that maintains and enhances landscape quality, character, rural amenity, and natural resources*

*21.2.9.3 Provide for the establishment of activities such as tourism, commercial recreation or visitor accommodation located within farms where these enable landscape values and indigenous biodiversity to be sustained in the longer term.*

*21.2.12.5 Protect, maintain or enhance the natural character and nature conservation values of lakes, rivers and their margins from inappropriate activities with particular regard to nesting and spawning areas, the intrinsic value of ecosystem services and areas of indigenous fauna habitat and recreational values.*

Evidence submitted in support of the proposal identifies that the site can absorb the sub zone, while encouraging revenue producing activities.

## **Chapter 28 – Natural Hazards**

*28.3.1 Objective - The risk to people and the built environment posed by natural hazards is managed to a level tolerable to the community.*

*28.3.1.1 Policy - Ensure assets or infrastructure are constructed and located so as to avoid or mitigate:*

- a. the potential for natural hazard risk to human life to be exacerbated; and*
- b. the potential risk of damage to property and infrastructural networks from natural hazards to the extent practicable, including consideration of the locational, technical and operational requirements of regionally significant infrastructure.*

*28.3.1.2 Restrict the establishment of activities which significantly increase natural hazard risk, including where they will have an intolerable impact upon the community and built environment.*

*28.3.2 Objective - Development on land subject to natural hazards only occurs where the risks to the community and the built environment are appropriately managed*

*28.3.2.2 Not preclude subdivision and development of land subject to natural hazards where the proposed activity does not:*

- a. accelerate or worsen the natural hazard risk to an intolerable level;*
- b. expose vulnerable activities to intolerable natural hazard risk;*
- c. create an intolerable risk to human life;*
- d. increase the natural hazard risk to other properties to an intolerable level;*
- e. require additional works and costs including remedial works, that would be borne by the public.*

*28.3.2.3 Ensure all proposals to subdivide or develop land that is subject to natural hazard risk provide an assessment that meets the following information requirements, ensuring that the level of detail of the assessment is commensurate with the level of natural hazard risk:*

- a. the likelihood of the natural hazard event occurring over no less than a 100 year period;*
- b. the type and scale of the natural hazard and the effects of a natural hazard on the subject land;*
- c. the effects of climate change on the frequency and scale of the natural hazard;*
- d. the vulnerability of the activity in relation to the natural hazard;*
- e. the potential for the activity to exacerbate the natural hazard risk both within and beyond the subject land; f. the potential for any structures on the subject land to be relocated;*

- g. the location, design and construction of buildings and structures to mitigate the effects of natural hazards, such as the raising of floor levels.*
- h. management techniques that avoid or manage natural hazard risk to tolerable level, including with respect to ingress and egress of both residents and emergency services during a natural hazard event.*

*28.3.1.2 Policy Restrict the establishment of activities which have the potential to increase natural hazard risk, or may have an impact upon the community and built environment.*

In accordance with the evidence submitted in support of the proposal, by Geoconsulting Ltd (**Appendix F**), there is some scope for mitigation measures to be considered subject further assessment on site, which can be further considered as resource consent stage.

## Appendix H

### SECTION 32AA EVALUATION IN RELATION TO UPPER GLENORCHY VISITOR ACCOMMODATION SUB-ZONE

This evaluation assesses the costs, benefits, efficiency, and effectiveness of various options for development on land within upper Glenorchy identified as Lots 1, 2 and 3 DP23952; Lots 4 and 6 DP24043; Part Sections 16, 17, 18, 19, 20, 21, 22 and 23 Block II Dart Survey District (SO404); and Sections 40 and 48 Block II Dart Survey District SO404 Planning - Map 6. The purpose of the assessment is to assess which of the options is most appropriate to achieve the relevant objectives of the Proposed District Plan.

The options considered in this evaluation are:

- (i) Preferred Option 1 – Proposed Upper Glenorchy Visitor Accommodation Subzone;
- (ii) Option 2: Status Quo i.e. Retain PDP Stage 2 Visitor Accommodation as notified – Visitor Accommodation a Discretionary Activity in Rural Zone including Trust Site

Preferred Option 1 – Proposed Upper Glenorchy Visitor Accommodation Subzone & Associated Restricted Activity Rule

Costs	Benefits	Effectiveness & Efficiency
<p>Providing for development pursuant to the proposed VASZ and associated Restricted Discretionary Activity Rule will have associated environmental impacts.</p> <p>Costs incurred as a consequence of RDA consent requirements.</p>	<p>Provides a focused regime to enable the establishment of well designed and appropriately located visitor accommodation within a rural environment, while at the same time ensuring that landscape values and indigenous biodiversity to be maintained.</p> <p>Facilitates rural diversification and revenue producing activities where the site is otherwise not economically viable for farming activities.</p> <p>Positive ecological and natural environmental effects with the proposed indigenous vegetation restoration and enhancement.</p> <p>Reduced consenting costs given the more limited assessment matters compared</p>	<p>Generally enabling consenting regime which facilitates the establishment of accommodation within a rural environment in a manner that can appropriately manage the effects of development such that landscape values and indigenous biodiversity are maintained. The Rural Zone provisions apply in addition to the specific rules in the VASZ, including general standards, standards for buildings, and ONL assessment matters where a RDA is required and landscape is a matter of discretion.</p> <p>Subzone consistent with and implements the PDP objectives and policies, including strategic objectives.</p> <p>In comparison with Option 2, the subzone better implements Objectives 3.2.1.1,</p>

	<p>with a fully discretionary consenting regime (Option 2)</p> <p>The subzone better enables people to enjoy the ONL natural setting by being able to stay within a remote, wilderness part of the ONL where the natural landscape is 'all encompassing' and dominant.</p> <p>Further enhances the tourist accommodation opportunities/'offering' in the Glenorchy Area.</p>	<p>3.2.4, and Policies 6.3.7 &amp; 6.3.9<sup>1</sup> (see <b>Appendix H</b>).</p> <p>Provides clear guidance as to appropriate location of visitor accommodation (Objective 3.2.1.1), ensures that there will be a focus on the protection of natural environments and ecosystems (Objective 3.2.4)</p> <p>The restricted discretionary and non notified status of visitor accommodation in the subzone creates a greater level of certainty for development than discretionary status.</p> <p>Provides greater clarity and certainty that appropriately located and well designed accommodation will be consentable within the subzone, in particular with respect to Policy 6.3.12<sup>2</sup></p> <p>RDA consent status is more effective and efficient in terms of the enabling element of Objective 21.2.1, particularly as it will allow for an increase in the range of land uses contemplated for the property, while at the same time including a comprehensive framework for the management of potential impacts on natural values.</p>
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<sup>1</sup> Objective 3.2.1.1 The significant socio economic benefits of well designed and appropriately located visitor industry facilities and services are realised across the District

Objective 3.2.4.5 Public access to the natural environment is maintained or enhanced.

Policy 6.3.7 Enable continuation of the contribution low-intensity pastoral farming on large landholdings makes to the District's landscape character.

Policy 6.3.9 Encourage subdivision and development proposals to promote indigenous biodiversity protection and regeneration where the landscape and nature conservation values would be maintained or enhanced, ..

<sup>2</sup> Policy 6.3.12 6.3.12 Recognise that subdivision and development is inappropriate in almost all locations in Outstanding Natural Landscapes and on Outstanding Natural Features, meaning successful applications will be exceptional cases where the landscape or feature can absorb the change and where the buildings and structures and associated roading and boundary changes will be reasonably difficult to see from beyond the boundary of the site the subject of application

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Option 2: Status Quo i.e. Retain PDP Stage 2 Visitor Accommodation as notified – Visitor Accommodation a Discretionary Activity in Rural Zone including Trust Site

<b>Costs</b>	<b>Benefits</b>	<b>Efficiency and Effectiveness</b>
<p>Greater consenting costs associated with fully discretionary consent required in an ONL where Policy 6.3.12 applies.</p> <p>Environmental effects of specific proposal will be assessed as time of future resource consent application.</p> <p>The high level of consenting uncertainty and costs may well discourage visitor accommodation resource consent applications for the site, with a resulting 'lost opportunity' cost for enhanced tourism facilities and farm diversification.</p>	<p>Council retains greater level of control over future accommodation proposals, including management of effects in an ONL.</p>	<p>Discretionary status of visitor accommodation largely consistent with and implements the PDP objectives and policies, including strategic objectives. Option not especially efficient in providing for diversification of rural land uses or adequately 'providing for' VA . Takes a case by case approach only to evaluating proposals for VA and does encourage or assist in identifying appropriate locations which protect/maintain and/or sustain landscape values and indigenous biodiversity), and thus is not effective or efficient in implementing Objectives 3.2.1, 3.2.1.1, 3.2.1.8, 3.2.6, 3.2.21, 6.3.7, 21.2.1.10, 21.2.8, 21.2.9.1, 21.2.9.3<sup>3</sup>.</p>

<sup>3</sup> Objective 3.2.1 The development of a prosperous, resilient and equitable economy in the District Objective 3.2.1.1 The significant socio economic benefits of well designed and appropriately located visitor industry facilities and services are realised across the District  
3.2.1.8 Diversification of land use in rural areas beyond traditional activities, including farming, provided that the character of rural landscapes, significant nature conservation values and Ngāi Tahu values, interests and customary resources, are maintained.  
3.2.6 The District's residents and communities are able to provide for their social, cultural and economic wellbeing and their health and safety.  
3.3.21 Recognise that commercial recreation and tourism related activities seeking to locate within the Rural Zone may be appropriate where these activities enhance the appreciation of landscapes, and on the basis they would protect, maintain or enhance landscape quality, character and visual amenity values  
Policy 6.3.7 Enable continuation of the contribution low-intensity pastoral farming on large landholdings makes to the District's landscape character.  
21.2.1.10 Commercial activities in the Rural Zone should have a genuine link with the rural land or water resource, farming, horticulture or viticulture activities, or recreation activities associated with resources located within the Rural Zone.  
21.2.9 Objective - Provision for diversification of farming and other rural activities that protect landscape and natural resource values and maintains the character of rural landscapes.  
21.2.9.1 Encourage revenue producing activities that can support the long-term sustainability of the rural areas of the district and that maintain or enhance landscape values and rural amenity.  
21.2.9.3 Provide for the establishment of activities such as tourism, commercial recreation or visitor accommodation located within farms where these enable landscape values and indigenous biodiversity to be sustained in the longer term.

		<p>A fully discretionary consent process for VA within an ONL is likely to be costly and uncertain, and is not efficient. This is particularly the case for locations such as the proposed VASZ where locations have been identified as appropriate to provide for visitor accommodation.</p>
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