

## Queenstown Lakes District Council

### Proposed District Plan - Submission

Clause 6 of First Schedule, Resource Management Act 1991  
FORM 5

Correspondence to:  
Attn: Planning Policy  
Queenstown Lakes District Council  
Private Bag 50072  
QUEENSTOWN 9348

#### 1. Submitter details:

**Full Name of Submitter:** Mee Holdings Limited  
**Address for Service:** C/- Todd & Walker Law, PO Box 124, Queenstown, 9348  
**Email:** ben@toddandwalker.com  
**Contact Person:** Ben Gresson/Graeme Todd

#### 2. Scope of submission

- 2.1 This is a submission to the Queenstown Lakes District Proposed District Plan (PDP) Landscape Schedules, notified 30 June 2022.
- 2.2 The submitter could not gain an advantage in trade competition through the submission.
- 2.3 The scope of this submission is detailed below and in Part 3 of the submission.
- 2.4 The specific provisions that my submission relates to are:
- |                          |  |
|--------------------------|--|
| (a) Schedule             | 21.22.1 Peninsula Hill ONF   |
| (b) Any other provisions | Any other provisions relevant to the purpose of this submission described in Part 3 below. |

#### 3. Submission

- 3.2 The Submitter **OPPOSES** the Peninsula Hill ONF Priority Area Landscape Schedule 21.22.18 and seeks further information, clarification and amendments as set out below:
- (i) The circumstances in which Council planners will utilise the information in the Landscape Schedules is not clear from the notified variation. It is assumed (as they have not been indicated as such by underlined text) that the Landscape Schedules are intended as insertions into Chapter 21 of the PDP. This is assumed to be the intention from both the numbering and the explanation in the Section 32 evaluation. Notwithstanding this, no text within Chapter 21 is proposed to be varied, meaning the only references to the Landscape Schedules is in Chapter 3 provisions as a result of the Environment Court decisions on Topic 2. It is not clear in what instances Council planners

processing resource consents will refer back to the Chapter 3 provisions and utilise these Landscape Schedules as a result. For instance, whether an application seeking consent under a District Wide rule only (and undertaken as a permitted activity within the Rural Zone and therefore not triggering any provisions in Chapter 21) will be required to address the matters in the Landscape Schedules is not clear. Potential applications include those for earthworks under Chapter 25 or for utilities under Chapter 30. Applications under these District Wide rules would generally not necessitate an assessment of the provisions of Chapter 3 (on the basis that the provisions of the chapter give effect to the strategic direction of the PDP) but Council planners would not be prevented from referring to them. If this were to occur, it could result in additional costs as planners and landscape architects are required address the detail in the Landscape Schedules and the provisions of Chapter 3.

- (ii) No rating scale is provided for the landscape capacities. From a review of the various Priority Areas, it appears to range as follows: No capacity; very limited capacity; limited capacity; some capacity. The extent of the capacity rating scale should be confirmed within the Landscape Schedules. It should also be clear from the rating scale how these interrelate with the wording used in the provisions in Chapter 3. For example, Strategic Policy 3.3.31 states: “*Avoid adverse effects on the landscape values of the District's Outstanding Natural Features and Outstanding Natural Landscapes from residential subdivision, use and development where there is little capacity to absorb change.*” [emphasis added]
- (iii) It is submitted that there may be some capacity for tourism related activities, rural living and urban expansion without compromising the ONF values. Amend the Landscape Capacity rating accordingly.

#### 4. The Submitter seeks the following decision from the Queenstown Lakes District Council:

- 4.1 The Submitter seeks the relief set out in Part 3 of this submission.
- 4.2 The submitter seeks in the alternative additional or consequential relief necessary or appropriate to address the matters raised in this submission and/or the relief requested in this submission, including modifications to the landscape schedule or any such other combination of plan provisions, objectives, policies, rules and standards provided that the intent of this submission, as set out in Part 3 of this submission, is enabled.

The Submitter **DOES** wish to be heard in support of this submission.

If others make a similar submission, the Submitter will consider presenting a joint case with them at a hearing.

Signature of Submitter



G M Todd

Authorised to sign on behalf of Mee Holdings Limited

Date: 22 August 2022

Telephone: 03 441 2743

**Notes to person making submission:**

If you make your submission by electronic means, the email address from which you send the submission will be treated as an address for service.

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6 (4) of Schedule 1 of the Resource Management Act 1991.

**The submitter could NOT gain an advantage in trade competition through this submission.**