



Mackenzie
DISTRICT COUNCIL

PLAN CHANGE 29 – OPEN SPACE AND RECREATION ZONES, NOISE, SIGNS AND TEMPORARY ACTIVITIES, VARIATION 1 PLAN CHANGE 23, VARIATION 2 TO PLAN CHANGE 26, AND VARIATION 2 TO PLAN CHANGE 27

FURTHER SUBMISSION

**FORM 6
UNDER CLAUSE 8 OF THE FIRST SCHEDULE OF THE RESOURCE MANAGEMENT ACT 1991**

Please note all information provided in this submission will be made publicly available

Details of Further Submitter

Full Name: <i>(Required)</i>	Tekapo Landco Limited & Godwit Leisure Limited
Contact Person: <i>(If different from above)</i>	Jonathan Speedy
Postal Address: <i>(optional)</i>	PO Box 43 Lake Tekapo
Email Address: <i>(Required)</i>	jonathan@covington.co.nz
Telephone Number: <i>(Required)</i>	0212344132

Further Submitter Declaration

I am:

- ☐ a person representing a relevant aspect of the public interest. In this case, also specify the grounds for saying that you come within this category below.
- ☒ a person who has an interest in the proposal that is greater than the interest the general public has. In this case, also explain the grounds for saying that you come within this category below.

(Tick one box)

Tekapo Landco Limited & Godwit Leisure Limited made an original submission on Plan Change 29 and owns land adjacent to, and including, land affected by the submission of Tekapo Springs.

Further Submission Details

I support/oppose the submission of:

(enter the name and address of original submitter and the original submitter number)

Tekapo Springs #29.29

The particular parts of the submission I support/oppose are:

(clearly indicate which parts of the submission you support or oppose, together with any relevant provisions of the proposal)

Refer attached.

The reasons for my support or opposition are:

(give reasons)

Refer attached.

I seek that the whole or part (describe part) of the submission be allowed or disallowed:

(give precise details)

Refer attached.

- ☒ **I wish to be heard** in support of my further submission.
☐ **I do not wish to be heard** in support of my further submission.
(Tick one box)

If others make a similar further submission I **would** / **would not** (circle one) be prepared to consider presenting a joint case with them at any hearing. ■

Signature of further submitter or person authorised to sign on behalf of further submitter
(A signature is not required if you make your submission by electronic means.)

24/2/2025

Date:

The closing date for lodging a further submission is **5pm Monday 24 February 2025**. Please note that a copy of your further submission must be served on the original submitter within five working days after it is served on the Mackenzie District Council.

Your submission (or part of your submission) may also be struck out if the authority is satisfied that at least one of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious;
- it discloses no reasonable or relevant case;
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further;
- it contains offensive language; or
- it is supported only by material that purports to be independent expert evidence but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

Once the closing date for further submissions has passed, Council hearings for the Plan Changes, Variations and Designations will be arranged to consider all submissions. Anyone who has made a submission or further submission and indicated that they wish to be heard will have the right to attend the hearings and present their submission or further submission.

If you have any questions regarding the Plan Changes, Variations and Designations or the further submission process, please do not hesitate to contact the Planning Department at 03 685 9010 or via email districtplan@mackenzie.govt.nz.

FORM 6

FURTHER SUBMISSION ON A PUBLICLY NOTIFIED PLAN CHANGE/ VARIATION

CLAUSE 8 OF FIRST SCHEDULE

RESOURCE MANAGEMENT ACT 1991

To: Mackenzie District Council, PO Box 52 FAIRLIE 7949

Full name of Submitter: Tekapo Landco Limited and Godwit Leisure Limited

Address for service: Tekapo Landco Limited and Godwit Leisure Limited
PO Box 43, Lake Tekapo
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DATE: 24 February 2025

SUBJECT: Further Submission on Mackenzie District Plan Review - Stage 4:

- **Plan Change 29** – Open Space and Recreation Zones, Noise, Signs and Temporary Activities, Variation 1 Plan Change 23, Variation 2 to Plan Change 26, and Variation 2 to Plan Change 27
- **Plan Change 30** – Special Purpose Zones, Variation 2 to Plan Change 23, Variation 3 to Plan Change 26, and Variation 3 to Plan Change 27

Clause 8, Schedule 1 RMA 1991 The submitter has an interest in the proposed policy statement or plan greater than the interest that the general public has.

The submitter wishes to be heard in support of their submission.

I support (in part) and oppose (in part) the submission of:

- Tekapo Springs (#29.29 and #30.15)

The particular parts of the submission I support/oppose and the reasons for my support/opposition are outlined in the table below.

Original Submission Point	Provision	Original Submission Point Summary	Relief/ Decision Sought by submitter	TL&GL Further submission Support or Oppose	TL&GL Further submission The reasons for my support/opposition are:	TL&GL Further submission I seek the following:
Plan Change 29 - Open Space and Recreation Zones						
29.01		The proposed Plan Change does not adequately address nor make allowance for commercial and tourism related development, redevelopment, expansion, operation, and futureproofing for the Tekapo Springs, including within the Sport and Active Recreation Zone (SARZ) and the Open Space Zone (OSZ). The Submitter seeks to preserve the opportunity for further expansion of its business operations. Zoning change requested will ensure neighbouring site's zoning is consistent with the submitter's property and better enable commercial and tourism-related development.	Areas of the identified Neighbouring Properties shown as areas 'A' and 'B' in Appendix 2 to the submission be rezoned as SARZ (Refer to Appendix 1 to Summary of Submissions). An alternative to this relief sought is set out in submissions on PC30 (submission point 15.01) which seeks a 'Tekapo Tourism Overlay / Precinct or 'Tekapo Springs Special Purpose Zone' (TSSPZ).	I oppose the proposed rezoning.	TL&GL have lodged an original submission seeking a wider rezoning of Lot 401 DP 560853 which includes a proposed larger SARZ of 2.7 ha adjacent to the Tekapo Springs, as outlined in Submission #29.10 and this remains the primary relief sought by TL&GL. For this reason, submission point 29.01 is opposed. However, TL&GL support the intent of the rezoning of the adjacent properties sought by the submitter in the event that TL&GL's rezoning is not accepted.	That the submission point be disallowed.
29.02	New	To better provide for anticipated commercial recreation and commercial activities to ease the consenting pathways for future expansion of the submitter's site and business.	Include a new specific control area over the submitter's Tekapo Springs facility to support the use of the site for commercial land-based recreation activities (Refer to Appendix 1 to Summary of Submissions).	I support the proposed specific control area	TL&GL support the submitters intent to provide for appropriate commercial and commercial recreation activities as well as their future expansion within the SARZ. TL&GL recognise the combination of attractions on the Tekapo Springs site may warrant a specific control area to enable future expansions or upgrades, however TL&GL seek that if a specific control area is included, that this be subject to appropriate footprint/coverage limits and height standards that maintain amenity, and that this also be included over the identified 'Neighbouring Properties'.	That the submission point be allowed.
29.03	SARZ-O1	To better provide for anticipated commercial recreation and commercial activities to ease the consenting pathways for future expansion of the Submitter's site and business.	Include commercial activities and ancillary supporting commercial / retail uses as a key purpose of the Zone.	I support the proposed recognition for commercial activities and ancillary supporting	Ancillary commercial and retail uses that support active and commercial recreation can be anticipated within the SARZ at an appropriate scale and TL&GL also agree this could be recognised within SAR-01.	That the submission point be allowed.

				commercial / retail uses within SARZ-01.		
29.04	SARZ-O2	To better provide for anticipated commercial recreation and commercial activities to ease the consenting pathways for future expansion of the submitter's site and business.	Include a Tekapo Springs specific control area as SARZ-O2(3) to ensure buildings and commercial recreation facilities and structures are designed to a high-quality standard, reflective of the purpose of the overlay and existing tourism infrastructure.	I support the proposed specific control area	TL&GL support the submitters intent to provide for appropriate commercial and commercial recreation activities as well as their future expansion within the SARZ. TL&GL recognise the combination of attractions on this site may warrant a specific control area to enable expansions or upgrades, however TL&GL seek that if a specific control area is included, that this be subject to appropriate footprint/coverage limits and height standards that maintain amenity, and that this also be included over the identified 'Neighbouring Properties'.	That the submission point be allowed.
29.05	SARZ-P1	To better provide for anticipated commercial recreation and commercial activities to ease the consenting pathways for future expansion of the submitter's site and business.	Include supporting and ancillary commercial and retail activities associated with commercial recreation facilities.	I support the proposed recognition for commercial activities and ancillary supporting commercial / retail uses within SARZ-P1.	Ancillary commercial and retail uses that support active and commercial recreation can be anticipated within the SARZ at an appropriate scale and TL&GL also agree this could be recognised within SAR-P1.	That the submission point be allowed.
29.06	New	To better provide for anticipated commercial recreation and commercial activities to ease the consenting pathways for future expansion of the Submitter's site and business.	Include a new policy for specific control area Tekapo Springs (requested in submission point 29.04), to enable activities that support and relate to the continued use, development, expansion and operation of the Tekapo Springs site.	I support the proposed specific control area and its reflection within a new policy.	TL&GL support the submitters intent to provide for appropriate commercial and commercial recreation activities as well as their future expansion within the SARZ. TL&GL recognise the combination of attractions on this site may warrant a specific control area to enable expansions or upgrades, however TL&GL seek that if a specific control area is included, that this be subject to appropriate footprint/coverage limits and height standards that maintain amenity, and that this also be included over the identified 'Neighbouring Properties'.	That the submission point be allowed.
29.07	SARZ-R6	To better provide for anticipated commercial recreation and commercial activities to ease the consenting pathways for future expansion of the submitter's site and business.	Include specific control area Tekapo Springs (as requested in submission point 29.04) in SARZ-R6 to ensure visitor accommodation is permitted	I oppose the proposed amendment to SARZ-R6	Provision for visitor accommodation as a permitted activity is opposed as this is not aligned with the primary purpose of the SARZ and is more appropriately assessed via a resource consent process.	That the submission point is disallowed.

			subject to similar standards as those for Area 14 (Ruataniwha).			
29.08	SARZ-R9	To better provide for anticipated commercial recreation and commercial activities to ease the consenting pathways for future expansion of the submitter's site and business	Expand food and beverage outlets to 200m2 in the Tekapo Springs specific control area (requested in submission point 29.04).	I oppose the proposed amendment to SARZ-R9.	The proposed amendment is considered unnecessary as notified SARZ-R9 allows 100m2 floor area <i>per tenancy</i> , which is considered to be an appropriate scale and allowance for this activity, recognising it is not the primary purpose of the zone and provision for food and beverage is intended to be ancillary to other anticipated activities.	That the submission point is disallowed.
29.09	SARZ-R10	To better provide for anticipated commercial recreation and commercial activities to ease the consenting pathways for future expansion of the submitter's site and business.	Include ancillary and supporting retail activities for commercial recreation activities in the Tekapo Springs specific control area (requested in submission point 29.04).	I support provision for ancillary and supporting retail activities for commercial recreation activities within SARZ-R10.	Support amendment to SARZ-R10 to provide for ancillary retail activities that are ancillary to commercial recreation, however TL&GL consider this should apply to the entire SARZ and not limited to a specific control area.	That the submission point is allowed.
29.10	Standards	To better provide for anticipated commercial recreation and commercial activities to ease the consenting pathways for future expansion of the submitter's site and business.	Amend height standards in relation to the Tekapo Site to exclude commercial recreation structures such as slides, lifts, sledding and tubing courses, and other similar and related structures.	I oppose the proposed amendment to standards.	Existing structures within the Tekapo Springs are understood to be lawful, and it is considered that any new tall structure that may be proposed in excess of 8m in height should be considered via a resource consent process. The submitter has also not provided any details regarding the specific changes to standards sought.	That the submission point is disallowed.
29.11	OSZ-O1	The wording of the OSZ provisions should be amended to better provide for anticipated commercial recreation and commercial activities.	If those areas of the identified Neighbouring Properties as shown as areas 'A' and 'B' (Refer to Appendix 1 to Summary of Submissions) are not rezoned (as requested by submission point 29.01), seek the following alternative relief: Amend OSZ-O1 – Zone Purpose to ensure the purpose of the zone provides for a predominance of passive recreation activities <u>as well as appropriate other recreation and commercial recreation activities.</u>	Oppose requested amendment to OZS-O1	The provision for limited compatible activities, such as commercial recreation in the OSZ is already provided for under 'OSZ-P2 Compatible Activities'. The proposed amendment to OSZ-O1 is considered not aligned with the primary purpose of the zone for passive recreation and has the potential to result in an inappropriate scale of commercial recreation in the zone.	That the submission point is disallowed.

29.12	OSZ-P2	The wording of the OSZ provisions should be amended to better provide for anticipated commercial recreation and commercial activities.	If those areas of the identified Neighbouring Properties as shown as areas 'A' and 'B' (Refer to Appendix 1 to Summary of Submissions) are not rezoned (as requested by submission point 29.01), seek the following alternative relief: Remove the wording 'does not detract from' in OSZ-P2 in relation to commercial recreation activities.	Oppose requested amendment to OSZ-P2	The notified wording of OSZ-P2 is considered more appropriate to recognise the primary purpose of the zone is for passive recreation.	That the submission point is disallowed.
29.13 <i>(*Note the submissions summary includes two points 29.13)</i>	OSZ-P3	The wording of the OSZ provisions should be amended to better provide for anticipated commercial recreation and commercial activities.	If those areas of the identified Neighbouring Properties as shown as areas 'A' and 'B' (Refer to Appendix 1 to Summary of Submissions) are not rezoned (as requested by submission point 29.01), seek the following alternative relief: Allow other supporting activities such as commercial recreation, or ancillary commercial activities where those are an extension or continuation of existing commercial recreation facilities.	Support	Support provision for limited extension of existing 'other activities' within the OSZ under OSZ-P3.	That the submission point be allowed.
29.13 <i>(*Note the submissions summary includes two points 29.13)</i>	OSZ-R6	The wording of the OSZ provisions should be amended to better provide for anticipated commercial recreation and commercial activities.	If those areas of the identified Neighbouring Properties as shown as areas 'A' and 'B' (Refer to Appendix 1 to Summary of Submissions) are not rezoned (as requested by submission point 29.01), seek the following alternative relief: Refine the listed matters of discretion in relation to commercial recreation activities to remove compatibility with	I oppose the requested amendment to OSZ-R6.	Oppose the removal of compatibility with passive recreational users and maintenance of visual amenity from the matters of discretion, as these matters are considered important to an assessment of potential effects of commercial recreation in the OSZ.	That the submission point is disallowed.

			passive recreational users and maintenance of visual amenity.			
29.14	New	The wording of the OSZ provisions should be amended to better provide for anticipated commercial recreation and commercial activities.	If those areas of the identified Neighbouring Properties as shown as areas 'A' and 'B' (Refer to Appendix 1 to Summary of Submissions) are not rezoned (as requested by submission point 29.01), seek the following alternative relief: Insert new rule to allow for the maintenance, operation, replacement, upgrade or minor extension of existing commercial recreation facilities.	Support	Support provision to allow for the maintenance, operation, replacement, upgrade or minor extension of existing commercial recreation facilities.	That the submission point is allowed.
29.15	Whole plan change	Opposes in part the Plan Change in relation to the submitter's property and the neighbouring properties.	The submitter seeks consequential, alternative, or other necessary changes to achieve the intention of the submission. A more refined suite of amendments may be provided in expert planning evidence.	-	-	-
Tekapo Springs Ltd, Submission PC29.29, Appendix 2, Submission points 29.01, 29.02 and 29.11-14		Tekapo Springs Ltd, Submission PC29.29, Appendix 2, Submission points 29.01, 29.02 and 29.11-14. 		Refer to specific submission points	Refer to specific submission points	Refer to specific submission points

Plan Change 30 – Special Purpose Zone						
15.01	New	Seeks to preserve the opportunity for further expansion of business operations. Zoning change requested will ensure neighbouring site's zoning is consistent with the submitter's property to better enable commercial and tourism-related development. Submitter seeks a new 'Tekapo Tourism Overlay / Precinct' or 'Tekapo Springs Special Purpose Zone' (TSSPZ) to be identified over the Submitter's Property (refer to Appendix 1 to Summary of Submissions), with this overlay providing for anticipated commercial recreation and commercial activities through realistic consenting pathways for future expansion of the submitter's site and business; and / or those areas of the identified neighbouring properties shown as areas 'A' and 'B' (refer to Appendix 1 to Summary of Submissions) be designated a similar zoning or overlay to provide for anticipated commercial recreation and related commercial activities across these areas.	As an alternative to the relief sought on PC29 (Refer submission points 29.01-29.14 on PC29), the submitter seeks the inclusion of suggested provisions into a new Special Purpose Zone or precinct/overlay, as set out below. A more refined suite of amendments may be provided in expert planning evidence.	Oppose	TL&GL oppose the proposed rezoning of the submitters land and Neighbouring Properties to 'Tekapo Tourism Overlay / Precinct' or 'Tekapo Springs Special Purpose Zone'. TL&GL have lodged an original submission seeking a wider rezoning of Lot 401 DP 560853 as outlined in Submission #29.10 and this remains the primary relief sought by TL&GL. For this reason, submission point 29.01 is opposed. TL&GL also oppose the proposed zone being applicable (and named) specific to the 'Tekapo Springs' site only, as this is effectively a spot zoning approach for a specific development and does not reflect the broad tourism offering or potential that exists within the wider area and township.	That the submission point be disallowed.