



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 30 and owns land adjacent to land affected by the submission of Queenstown Commercial Parapenters Ltd.

Further Submission Details

I support/oppose the submission of:

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

Queenstown Commercial Parapenters Limited #29.26

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
Name: Jonathan Speedy
email: jonathan@covington.co.nz
Ph: 021 234 4132

Contact: Name: Kim Banks, Patersons
email: kim.banks@patersons.co.nz
Ph: 021 034 4903

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

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 oppose in part the submission of:

- Queenstown Commercial Parapenters Ltd (#29.26)

The particular parts of the submission I oppose and the reasons for my 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						
26.06	OSZ-R6	<p>The submitter supports Rule OSZ-R6 which identifies commercial recreation activities as a restricted discretionary activity. This activity status is appropriate as it ensures that these activities can be granted consent but also allows scope to decline consent if the activity is inappropriate. We acknowledge that scope for the latter is appropriate given that there is potentially a large range of commercial recreation activities, a range of open space environments in which they could be located and therefore a large range in their actual and potential adverse effects on the environment.</p> <p>Submitter seeks amendments to matters of discretion (d) as the word 'maintenance' as inappropriate as it implies a static unchanging environment, or unchanging values. The amendment sought makes it clear that it is the proposal's consistency with the zone's anticipated amenity values and character that are to be assessed, not the amenity values and character of the existing environment. These can be quite different matters and it is the anticipated character and amenity values of the zone which should have precedence.</p> <p>Matter of discretion (e) is unclear and potentially creates an expectation that proposed developments will be put to the cost of enhancing degraded public areas, which is the responsibility of MDC, not resource consent applicants. The use of 'enhancement' is also inconsistent with the objectives and policies of the OSZ that do not refer to enhancement, and there is overlap with compatible passive recreational activities –</p>	<p>Amend as follows:</p> <p>Matters of discretion are restricted to:</p> <p>a. The nature, scale and intensity of the activity.</p> <p>b. Compatibility with passive recreational activities.</p> <p>c. Any impacts on other users of the site, or on accessibility.</p> <p>d. <u>Consistency with the zone's Maintenance anticipated character and of the visual amenity values</u> and character of the zone.</p> <p>e. Whether the activity enhances the experience of users of the area</p>	I oppose the requested amendment to OSZ-R6.	Oppose the suggested amendments to the matters of discretion, as these matters are considered important to an assessment of potential effects of commercial recreation activities that require consent in the OSZ.	That the submission point is disallowed.

		<p>therefore this assessment matter is sought to be deleted.</p> <p>Matter of restricted discretion (b) is sought to be amended given that compatibility is not a commonly used RMA standard. The submitter considers this is otherwise duplicated under matters a and c and can be deleted.</p>				
26.07	OSZ-S1	<p>Amendments are sought to Standards OSZ-S1 and OSZ-S2 to exclude recreation or commercial recreation equipment less than 10m² in area. The adverse effects of recreation equipment this size, such as bench seats, picnic tables, exercise equipment and support lines and wires would be very low, and often of a temporary nature rather than permanent buildings.</p> <p>As such it would be inefficient to require resource consent for activities with such low effects compared with the benefits obtained from requiring consent for those activities.</p>	<p>Amend as follows:</p> <p>The maximum height of any building or structure shall not exceed 5m above ground level, <u>except any ropes, lines or platforms of recreational or commercial recreational equipment less than 10m² in area.</u></p>	Oppose	The proposed amendment has the effect of allowing multiple separate small structures less than 10m ² to be excluded from the height provisions and this is not considered appropriate.	That the submission point is disallowed.
26.08	OSZ-S2	<p>Amendments are sought to Standards OSZ-S1 and OSZ-S2 to exclude recreation or commercial recreation equipment less than 10m² in area. The adverse effects of recreation equipment this size, such as bench seats, picnic tables, exercise equipment and support lines and wires would be very low, and often of a temporary nature rather than permanent buildings. As such it would be inefficient to require resource consent for activities with such low effects compared with the benefits obtained from requiring consent for those activities.</p>	<p>Amend as follows:</p> <p>Any building or structure <u>(excluding any recreation or commercial recreation equipment, fences, gates or signs less than 10m²)</u> shall be set back a minimum of 6m from any boundary (including a road boundary).</p>	Oppose	The proposed amendment has the effect of allowing multiple separate small structures less than 10m ² to be excluded from the setback provisions and this is not considered appropriate.	That the submission point is disallowed.
26.11	NOISE-R3		<p>Amend as follows:</p> <p>Noise associated with Recreational Activities <u>and Commercial recreation activities</u></p> <p>...</p>	Oppose	The proposed amendment would have the effect of noise from commercial recreation activities being permitted outdoors and this is not considered appropriate for the broad range, locations and potentially noisy activities that may be captured by this. Additionally, noise limits applicable to the	That the submission point is disallowed.

			1. The recreational activity does not involve powered motorsport, or gunfire; <u>and any commercial recreation activity is undertaken outdoors.</u>		Open Space Zone do not appear to be included in NOISE-Table 1.	
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