

BEFORE THE QUEENSTOWN LAKES DISTRICT COUNCIL Independent Hearings Panel

UNDER THE RESOURCE MANAGEMENT ACT 1991

IN THE MATTER OF

submissions to the Queenstown Town  
Centre Zone of the Queenstown Lakes  
District Proposed Plan by Queenstown  
Wharves GP Limited (Submitter #766)

Statement of Evidence of **Jennifer Jane Carter** on behalf of **Queenstown Wharves GP Limited**

18 November 2016

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## **1. Introduction**

- 1.1 My name is Jennifer Jane Carter. I have the qualification of Bachelor of Resource and Environmental Planning with First Class Honours. I am a full member of the New Zealand Planning Institute. I am also an active member of the New Zealand Resource Management Law Association.
- 1.2 By way of background, I was employed by CivicCorporation between 2001 and 2004, the latter half of that time as the Principal: Policy. Between 2004 and 2009 I practised as an independent resource management planning consultant, involved primarily in variations and plan changes to the Partially Operative Queenstown Lakes District Plan. Between 2009 and 2013 I was employed by Lakes Environmental Limited as the Principal: Resource Consents. In this role I managed the resource consents team responsible for processing the resource consents in the Queenstown Lakes District.
- 1.3 Between May 2013 and July 2016, I was employed at Remarkables Park Limited as the Planning Manager. In this role I was primarily responsible for preparing resource consent applications within the Remarkables Park Zone and Frankton Flats B Zone, and for assisting in the preparation of submissions to the Proposed District Plan. In July 2016 I established an independent resource management planning consultancy, and I now provide planning advice to a range of clients, including Remarkables Park Limited.
- 1.4 I have resided and worked in Queenstown since 2001.
- 1.5 I have complied with the Code of Conduct for Expert Witnesses contained in the Environment Court Consolidated Practice Note 2014. This evidence is within my area of expertise, except where I state that I am relying on another person, and I have not omitted to consider any material facts known to me that might alter or detract from the opinions I express.
- 1.6 This evidence is prepared on behalf of Queenstown Wharves GP Limited (Submitter number 766). I assisted in the preparation of the submission lodged on behalf of this party.
- 1.7 My evidence focuses on Chapter 12 Queenstown Town Centre, specifically on the provisions for wharves and jetties and commercial activities on the surface of water. I have read the Section 42A report prepared by Ms Vicki Jones, planning consultant engaged by the Queenstown Lakes District Council. I comment on that report in my evidence.

## **2. Background**

- 2.1 Queenstown Wharves GP Limited (QWL) is a listed company and is jointly owned by Remarkables Jet Limited, Real Journeys Limited and Skeggs Queenstown Properties Limited. QWL owns the St Omer and O'Regan wharves, located within the Queenstown Town Centre Waterfront Zone (QWZ). QWL also owns a wharf at Kelvin Heights and a swing mooring located adjacent to the Queenstown Gardens.

The below illustrates the approximate location of the wharves, the swing mooring and the Kelvin Heights Jetty. (Source: Colliers Information Memorandum dated November 2012)



2.2 Remarkables Jet is a subsidiary company of Remarkables Park Limited. Remarkables Park Limited owns the Remarkables Park Zone (RPZ). I understand that an application for a jetty in that part of the Kawarau River that is within Activity Area 2 of the RPZ is currently being prepared by Remarkables Park Limited. The jetty in that location is a controlled activity and is supported by Policies within Section 12.10 of the Operative Plan, in particular Policy 12.10.5(2) which reads:

2 *To encourage use of the river and lake as an alternative transport network, connecting Queenstown, Frankton, and the Remarkables Park Zone.*

2.3 QWL lodged submissions to the Proposed District Plan to, in summary, 'ensure that its aspirations for the use and management of the wharves it owns are provided for into the future, without unnecessary regulation and associated costs'.

2.4 QWL purchased the wharves from Ngai Tahu in November 2012. Both wharves first obtained resource consents in 1997, and since then obtained various time extensions and variations. I understand that both wharves were constructed in accordance with approved resource consents. O'Regans wharf was constructed in 2007 and provides a large promenade, with berthing facilities on its lake side. I understand that St Omer wharf was constructed some years earlier, and includes a 71m<sup>2</sup> building, with fuel storage and pumps and parking. The wharves are currently leased by various businesses for the purposes of charters and excursions.

2.5 It is anticipated that the current uses will continue and develop, in addition to the provision of facilities for passenger ferry services and further commercial recreational uses. For these reasons, QWL wishes to ensure that the wharves in its ownership are protected, but also

that there is opportunity for public transport linkages, both within the Frankton Arm of Lake Wakatipu and along the Kawarau River.

### **3. Summary of key issues**

3.1 Having read the Section 42A report, and considered the revised provisions in some detail, my evidence focuses on the following issues:

1. Zoning- The Queenstown Town Centre Waterfront SubZone (QWZ) is not shown clearly on the planning maps. The QWZ comprises three different areas and while this is referenced in the proposed rules the values associated with each of those areas should be better addressed.
2. The provisions have been transferred across from the Operative Plan and do not recognise or provide for the resource management issues faced by the QWZ now and into the future.
3. The provisions provide no support for passenger ferry services.

### **4. Zoning and planning map**

4.1 In its submission QWL requested clarification of the boundaries of the QWZ, particularly as it related to St Omer Wharf, and to clarify the rules that apply to each of its wharves. This was supported by the Section 42A report, and at Appendix 1, page 12-27 of that report planning map 36 is amended to clearly show the boundary of the QWZ.

4.2 This amendment is helpful. However, having considered the QWZ in more detail and given the existing activities and their location, I consider that further clarification should be provided, so that the areas within the QWZ referred to in the Rules are clearly demarcated on the planning map.

4.3 The following Figure 1 illustrates the three different areas that make up the QWZ.

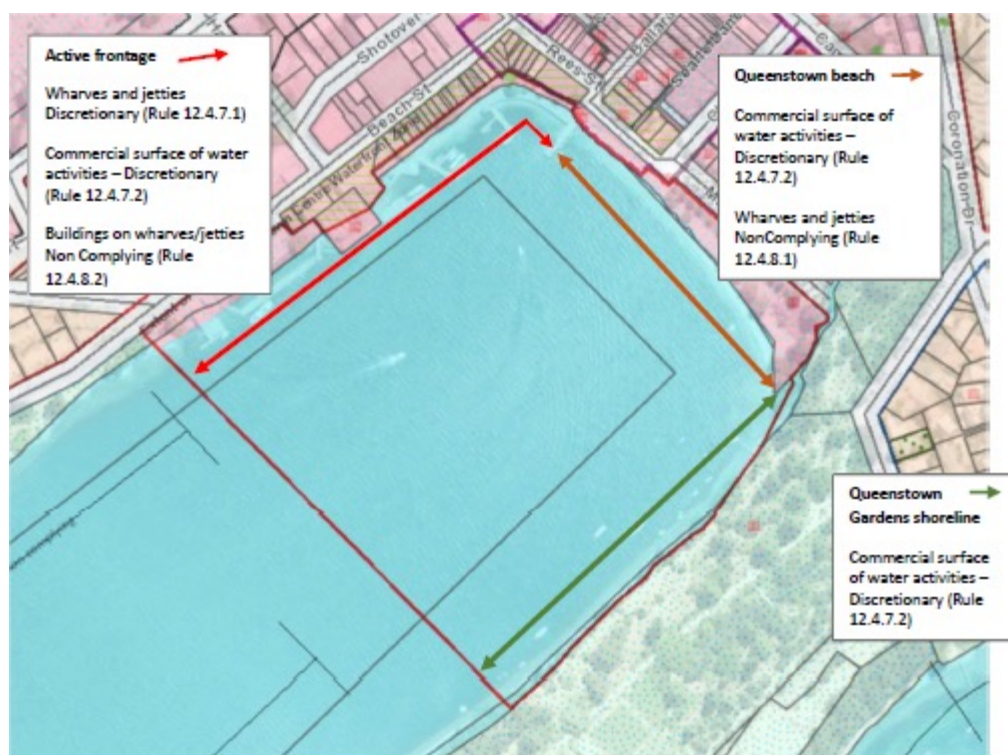


Figure 1: Three different areas within the QWZ and the applicable rules.

- 4.4 The different areas are recognised in the Rules. For instance, jetties are Discretionary if located between St Omers wharf and the Town Pier (Rule 12.4.7.1) but are non-complying elsewhere (Rule 12.4.8.1). However, the areas to which these rules apply are not clearly demarcated on the maps and the policies lack reference to the different values and attributes of these areas, and therefore risk being too general and lacking in direction.
- 4.5 A further issue is that Rule 12.4.8.2 technically excludes the stretch of the QWZ along the Queenstown Gardens Shoreline. Rule 12.4.8.2 reads:
- Wharfs and Jetties within the Queenstown Town Centre Waterfront Subzone between the Town Pier (as shown on the planning maps) and Queenstown Gardens;*
- 4.6 The Queenstown gardens start at the Horne Creek outlet, therefore this rule applies to the beachfront between the Town Pier and the Horne Creek outlet. If this interpretation is correct, then there is no rule for wharves and jetties on the approximately 360m extent of shoreline within the QWZ that adjoins the Queenstown Gardens. I therefore suggest that this is clarified.
- 4.7 The three areas can be demarcated as follows:
- (a) Active Frontage: the shoreline between the Town Pier and St Omer Park. This area contains a range of wharves and jetties supporting motorised craft and associated ticketing offices. The interface is vibrant and active, and comprises hard surfaces, with pedestrianised walkways, and a close relationship to bars and restaurants.

- (b) Queenstown Beach: The beach between the Town Pier and Horne Creek outlet is free of jetties and wharves and provides for recreation and some commercial recreation activities including kayaking and paddle boarding operations. The beach is natural and informal, with pedestrian linkage provided along wide footpaths, with trees and grass. The QWZ extends to the edge of Marine Parade and therefore contains the Bathhouse restaurant, childrens playground and public toilets.
- (c) Queenstown Gardens Shoreline: From the Horne Creek outlet to the southern extent of the QWZ (a distance of approximately 360m). Along this stretch are a small number of jetties and moorings. The adjacent Queenstown Gardens provides cycling and walking connections, and the shoreline is treed and natural.

4.8 Each of these areas has a different set of values and resource management issues. While the proposed provisions recognise those differences in the rules they are not reflected in the objectives and policies, which instead talk about achieving ‘integrated management’ and ‘applying a comprehensive approach to management’ at a broad level.

4.9 I suggest that a plan is provided that shows clearly the three different areas within the QWZ, and that the objective and associated policies and rules are re-drafted to recognise the three areas that comprise the QWZ.

## **5. Proposed objectives, policies and rules transferred from Operative District Plan (ODP)**

5.1 Objective 12.2.5 and Policies 12.2.5.1-12.2.5.6 provide specifically for the land-water interface. As identified at paragraph 16.7 of the Section 42A report, all the Objectives and Policies of the ODP bar one have been reinstated with only minor amendment. The explanation previously provided by the ODP has been removed. Further, the ODP rules have not been amended, and instead have been transferred across to the Proposed Plan. While guidance was previously provided by reference to Waterfront Management Plans, those references have been removed (they were dated 1993). I have searched the QLDC website for an updated reserve management plan for the Queenstown Bay reserves, and while I found reference to a call for feedback and a link to Frequently Asked Questions on a Draft Queenstown Bay Reserve Management Plan, there is no date provided, and I couldn’t find the Draft Plan. In its references (page 37) the Section 32 report includes a link to the Sunshine Bay, Queenstown Bay, Frankton, Kelvin Heights Foreshore Management Plan dated 1991 and the Queenstown Waterfront Development Plan dated 1994.

5.2 The Section 32 and Section 42A reports refer to background documents used in the preparation of the PDP, but do not seem to acknowledge the physical changes that have occurred to both the waterfront area and wider Queenstown since the ODP was first drafted. No reference is made to the Wakatipu Transportation Study (2007), and while the Jetties and Moorings Policy (2007) is included in the references to the Section 42A report, no further discussion is included.

5.3 Without researching all the jetty, wharf and commercial recreation activities applications that have been approved within the QWZ during the last 10-15 years, it is clear that the level of activity and number of structures has increased significantly since the ODP was first

drafted. Wider changes have also occurred which impact upon the QWZ, and the changes can be summarised as:

- Queenstown has grown significantly and this has contributed to the pressures now placed on the road network. It is now more difficult to access the Town Centre by private motor vehicle.
- A significant number of motorised commercial activities use the Lake resource, many commencing within the QWZ, including fishing charters, new jet boat operations (Thunderjet and KJet both use jetties in the QWZ), water taxi services, lake cruises (Pacific Gemm, Million Dollar Cruise and Southern Discoveries), and various motorised 'entertainment' such as the Hydro Attack, parapenting, and flyboarding.
- There are also a number of non-motorised activities within the QWZ, including paddle boarding and kayak hire.
- Wharves have been constructed within the QWZ, specifically, O'Regans and St Omers wharves.

5.4 These changes demonstrate the importance of updating the Plan to recognise the pressures now faced. This is recognised in the Town Centre Strategy, adopted by the Council in 2009. Specifically, page 3 of the Town Centre Strategy states:

*'The rapid growth that has occurred over the last 15 years has placed greater pressure on the Queenstown Town Centre than was anticipated in 1992. It is appropriate to revisit the issues facing the Town Centre in light of this growth pressure.'*

5.5 The provisions would be assisted by an updated explanation of the QWZ, and a strategic overview that addresses the resource management issues, before identifying the objectives and policies. As currently drafted a commercial activity on the surface of the water is assessed against the same objectives and policies that were in place in 1995 and the policies fail to address the different areas within the QWZ. Instead they call for 'integrated management' (Objective 12.2.5) and 'a comprehensive approach' (Policy 12.2.5.2) without any clear direction as to what those statements mean for the QWZ. For instance, the shoreline of the Queenstown Gardens currently provides for passive use and is the foreground to more distant views. The PDP gives no direction as to whether that use and character is important. In comparison, what I have termed the Active Frontage provides for a range of uses and activities. Yet the objectives and policies do not distinguish between the two areas.

5.6 The QWZ is a finite resource and is extremely important for the vibrancy and success of the Queenstown Town Centre. It is under pressure from a range of potentially competing activities and as currently drafted the provisions give little direction or guidance.

## **6. Passenger ferry services**

6.1 The QWL submission requests that the importance of providing passenger based public transport is recognised and to that end requests amendments to the proposed provisions. The potential to use the Lake as part of the wider transport network is not a new concept, and was included in the Wakatipu Transportation Study prepared by the Queenstown Lakes District Council, Otago Regional Council and Transit New Zealand in 2007. At page 6 the



Strategy provides a map titled ‘Wakatipu Transportation Strategy to 2026’. This shows the intention to include ferry services within the passenger transport network.

- 6.2 The Jetties and Wharves Policy (adopted by the QLDC in 2007) also recognised the importance of the Lake as part of the transport network. One of the General Principals listed on page 1 reads as follows:

*“The Council considers the surface of Lake Wakatipu as important for the future transportation needs of the Wakatipu basin, therefore all structures and moorings on the lake must be compatible with meeting these future needs”. (Jetties and Moorings Policy For the Frankton Arm and other environs of Lake Wakatipu Adopted 29 June 2007)*

- 6.3 The Queenstown Town Centre Strategy (2009) also references the importance of providing high quality passenger transport services. Issue 5 of the Town Centre Strategy reads:

*Ease of access to the Town Centre is essential but the amenity of the Town Centre can be adversely affected by traffic volumes and the town centre is increasingly dominated by vehicle traffic. (Queenstown Town Centre Strategy, Issue 5, page 11).*

- 6.4 I disagree with the suggestion at paragraph 17.10 of the Section 42A report that the consideration of public transport is best delayed until Stage 2 of the District Plan Review, when the Transportation Section is drafted. It is clear from the Council’s policy documents that the Lake is recognised as part of the public transport network, providing connections between the Town Centre and the wider area, and thus contributing to addressing the access issues faced by the Town Centre.

- 6.5 In my opinion, the proposal to delay poses significant risk, namely that
- Opportunities to provide passenger transport connections could be lost; there is no incentive to provide such services and no certainty that the facilities required on the jetty or wharf would gain consent (they are non-complying);
  - Passenger ferry services are given no greater support in the policy framework than other (potentially competing) commercial activities; all commercial surface of water activities are a discretionary activity and assessment matters and policies give no support to the contribution to the public transport network;
  - Consents for commercial activities on the surface of water could continue to be approved without considering the finite nature of the interface resource, increasing the congestion within the QWZ to a point where there is no longer capacity for passenger ferries;
  - There is no recognition in the Policy framework of the different areas within the QWZ, and there is a loop hole in the current rules whereby there is no rule providing specifically to jetties on shoreline of the Queenstown gardens. There is a risk that a passenger ferry provides linkage to the more natural, less connected side of the QWZ where it would have greater impact on the amenity values associated with the QWZ.

- 6.6 There is a risk that in the next few years, while we wait for the Transport Section to catch up, and for variations to the QWZ to be developed, that we literally miss the boat.

6.7 Including supportive provisions now is within the scope of submissions, and there is little risk that it would adversely impact upon integrated management. To the contrary, it would be difficult to achieve Objective 12.2.5 without providing greater direction within the policies and rules.

6.8 In my opinion, the QWZ between St Omer Park and the Town Pier is clearly a resource that can be used for water based public transport connections. Support should be given to achieving those connections, and such support can be provided within the policy framework while also maintaining the values of the QWZ. Failing to address this issue in the PDP poses significant risk, not just to the QWZ, but also to the wider Town Centre Objectives relating to achieving accessibility and reducing use of private motor vehicles.

## **7. Suggested amendments**

7.1 Based on the above assessment, I recommend that the following amendments are made to the QWZ.

7.2 Resource Management Issue:

*The Queenstown water front is an extremely important resource, contributing to the amenity values and vibrancy of the Queenstown town centre. It also has the potential to provide public transport connections. The water front area of Queenstown risks becoming congested with competing uses and these competing uses can have adverse impacts on safety, amenity and connectivity.*

### **12.2.5 Objective**

*The Queenstown Waterfront Subzone (QWZ) continues to provide a vibrant, active environment while maintaining views to the surrounding Lake and mountains, and providing an important focus for the Queenstown Town Centre.*

*The land-water interface is an important resource that provides*

- *Views to the surrounding lake and mountains*
- *Access to the lake and the surrounding settlements*
- *Energy and vibrancy by providing a range of activities linked to the Town by jetties and wharves.*

### **12.2.5 Policies**

*12.2.5.1 Activities and development in the QWZ are managed so that they build on the existing character of Queenstown Bay, recognising the values associated with the three different sub-areas: the Active Frontage, Queenstown Beach, and the Gardens shoreline.*

*12.2.5.2 Recognise the importance of Queenstown Beach for pedestrian and cycle connections, recreation and small scale, non motorised commercial activities by avoiding locating new jetties, wharves and structures*

- 12.2.5.3 *Avoid locating new jetties and wharves/structures and commercial activities on the Gardens shoreline, recognising the importance of this area as a foreground to the Gardens and the vista beyond, and its natural, informal character.*
- 12.2.5.4 *Provide for new activities within the Active Frontage, subject to the continued safety and accessibility of existing activities, the ability to accommodate passenger ferry services and the retention of amenity values.*
- 12.2.5.5 *As far as practical, to avoid structures and buildings on wharves that block views to the lake and surrounding mountains while recognising the need for ticketing facilities and shelter associated with passenger ferry services.*
- 12.2.5.6 *Recognise the benefits associated with providing a passenger ferry system that utilises the Lake as part of the wider transport network, providing connection between the Town Centre and Kelvin Heights, Frankton and Jacks Point.*
- 12.2.5.7 *Retain pedestrian accessibility to the lake shore, and views across the Lake to the surrounding mountains.*
- 12.2.5.8 *Locate fuel storage and facilities at one site to reduce the potential adverse effects associated with the necessary buildings and storage facilities while recognising the need for suitable structures to allow vessels to safely undertake refuelling and effluent discharge.*

**Add the following definition:**

***Passenger ferry service:***

*A boat service that conveys passengers (visitors and residents) on a regular service that provides connections between the Queenstown Town Centre, and locations within the wider Queenstown area including jetties and wharves on the Frankton Arm and the Kawarau River.*

**Rules**

The following table provides recommended amendments to the Rules, additions shown as underline and deletions as strikethrough. Where relevant I have provided discussion in the right- hand column. I have attempted to follow the numbering system provided in the PDP. However, I suggest that the rules would be improved by locating all those relevant to the QWZ in one location, and grouped based on Buildings on wharves and jetties, Wharves and jetties (maintenance and applications for new), and Activities on the surface of water and on the land within the QWZ. I will draft a revised set of provisions for the hearing.

	<b><i>Activities Located in the Queenstown Town Centre Zone</i></b>		<b><i>Discussion</i></b>
12.4.3	<p><b><u>Commercial Activities within the Active Frontage of the Queenstown Town Centre Waterfront Subzone</u></b> (including those that are carried out on a wharf or jetty) except for those commercial activities on the surface of water that are provided for as discretionary activities pursuant to Rule 12.4.7.2 in respect of:</p> <p>(a) Any adverse effects of additional traffic generation from the activity;</p>	C	<p>This rule applies to commercial activities within the QWZ, and doesn't differentiate between the three areas. I suggest that consideration is given to placing greater level of restriction on commercial activities, depending on location and scale. For instance, a commercial activity</p>

	<p>(b) The location and design of access and loading areas in order to ensure safe and efficient movement of pedestrians, cyclists, and vehicles; and</p> <p>(c) The erection of temporary structures and the temporary or permanent outdoor storage of equipment in terms of:</p> <p>i. any adverse effect on visual amenity and on pedestrian or vehicle movement; and</p> <p>ii. the extent to which a comprehensive approach has been taken to providing for such areas within the subzone.</p>		<p>may be more appropriate within the Active Frontage than on the Queenstown Beach or the Gardens Shoreline, and this could be reflected in the rules by amending 12.4.3.</p>
12.4.7a	<p><b><u>Maintenance, upgrading and development of existing jetties and wharfs in the Active Frontage Area (provided the existing scale, nature and intensity is unchanged)</u></b></p> <p><u>Control is reserved over:</u></p> <ul style="list-style-type: none"> <li>- <u>The necessity of the maintenance to ensure continued safety and compliance</u></li> <li>- <u>Nature and scale of change</u></li> <li>- <u>Appearance</u></li> </ul>	C	<p>This amendment was requested by Real Journeys Limited. The Section 42A report recommends rejecting that submission, stating that existing use rights adequately provide for the maintenance of jetties and wharfs.</p> <p>While existing use rights do exist the maintenance of wharfs will not necessarily be provided for by existing use rights, primarily because upgrades to achieve compliance with safety standards will in many cases necessitate alterations that are beyond existing use rights. The Lake is a dynamic resource and this will result in changes to the appearance of a structure.</p> <p>In my opinion, if the nature and scale of the change is unchanged, and the upgrade is necessary, and within the Active Frontage, then controlled activity status is appropriate.</p>
12.4.7.3	<p><u>Excluding maintenance and alterations permitted by rule 12.4.7(a) above, the construction and use of a <b>single storey building for the purpose of a ticketing office</b> located within the Active Frontage is a restricted discretionary activity. Council's discretion is limited to:</u></p> <ul style="list-style-type: none"> <li>- <u>Building location, design and use in terms of compatibility with the nature and scale of existing buildings and open spaces, including the ability to maintain a continuous waterfront walkway;</u></li> <li>- <u>Accessibility in terms of servicing requirements;</u></li> <li>- <u>Outdoor storage requirements;</u></li> <li>- <u>Storage and disposal of waste;</u></li> <li>- <u>Signage platforms; and</u></li> </ul>	RD	<p>Instead of differentiating between the various activities that the building might support in the rules (i.e. buildings for the purposes of providing a passenger ferry service are controlled and those for other commercial activities are discretionary), I suggest that the activity status is restricted discretionary for all buildings that are located on wharves or jetties within the Active Frontage area. The support for the type of activity that the building is to accommodate is</p>

	<p><u>- Health and safety</u>  <u>Contribution to the transport network</u>  <u>Connections between land and water including pedestrian access, linkage to car parks and bus stops, and bicycle connections and facilities</u>                  .</p>		<p>provided in the policies.</p> <p>I have adopted the suggested rule included in Real Journey's submission, and have added an additional two matters of discretion.</p>
<p><b>12.4.7</b></p>	<p><b>Surface of Water and Interface Activities</b></p> <p>12.4.7.1 Wharfs and Jetties within the Queenstown Town Centre Waterfront – Active Frontage Area <del>subzone between the Town Pier and the subzone boundary in the vicinity of St Omer Park (designation 217)</del> as shown on the planning maps;</p> <p>12.4.7.2 Commercial Surface of Water Activities within the Queenstown Town Centre Waterfront Subzone, as shown on the planning maps, <u>except public passenger ferry services.</u></p> <p>In respect of the above activities, the Council's discretion is unlimited but it shall consider:                  The extent to which the proposal will:</p> <ul style="list-style-type: none"> <li>• Create an exciting and vibrant waterfront which maximises the opportunities and attractions inherent in a visitor town situated on a lakeshore;</li> <li>• <del>Provide</del> Maintain a continuous waterfront walkway from Horne Creek right through to St Omer Park;</li> <li>• Maximise the ability to cater for commercial boating activities to an extent compatible with maintenance of environmental standards and the nature and scale of existing activities <u>and passenger ferry services</u></li> <li>• Provide for or support the provision of one central facility in Queenstown Bay for boat refuelling, bilge pumping, sewage pumping.</li> <li>• Maintain or enhance public access to the lake and amenity values including character; and</li> <li>• Affect water quality, navigation and people's safety, and adjoining infrastructure;</li> </ul> <p>The extent to which any proposed structures or buildings will:</p> <ul style="list-style-type: none"> <li>• Enclose views across Queenstown Bay; and</li> <li>• Result in a loss of the generally open character of the Queenstown Bay and its interface with the land;</li> <li>• Affect the values of wahi tupuna;</li> </ul>	<p><b>D</b></p>	<p>I suggest amending this rule to refer to the Active Frontage as shown on the planning maps. I also recommend excluding public passenger ferry services.</p> <p>I note that the Section 42a report recommends including a list of 'assessment matters'. I suggest these would be better located in the policies. I also note that some of those matters are difficult to apply. For instance, retaining open character doesn't apply to the Active Frontage and may be difficult to apply to surface of water activities, given that these are not fixed. For instance, at what point does the addition of another activity reduce the open character of the QWZ?</p>
	<p><b><u>Passenger Ferry Service</u></b></p> <p><b><u>Discretion is reserved over:</u></b></p> <ul style="list-style-type: none"> <li>- <u>The contribution of the ferry service to the Queenstown transport network and its wider connections</u></li> <li>- <u>Connections between land and water including pedestrian access, linkage to car</u></li> </ul>	<p><b>RD</b></p>	<p>Currently a passenger ferry service would be considered a commercial activity on the surface of water and would therefore be a discretionary activity.</p> <p>Providing a passenger ferry</p>

	<p><u>parks and bus stops, and bicycle connections and facilities</u></p> <ul style="list-style-type: none"> <li>- <u>Safety</u></li> <li>- <u>Nature and scale</u></li> </ul>		<p>service that berths at one of the existing wharves within the Active Frontage is logical, given that there are already wharves in this location that can accommodate such services, it builds on the existing pattern of activity and avoids the location of wharves or jetties where there is greater potential for adverse effects.</p>
<b>12.4.8</b>	<p><b>Surface of Water and Interface Activities:</b></p> <p>12.4.8.1 Wharfs and Jetties within the Queenstown Town Centre Waterfront Subzone <del>between the Town Pier (as shown on the planning maps) and Queenstown Gardens;</del> <u>within the Queenstown Beach and Queenstown Gardens Shoreline</u></p>	NC	<p>This amendment is to clarify where the rule applies.</p>
	<p>12.4.8.2 Any buildings located on Wharfs and Jetties within the <u>Queenstown Beach and Queenstown Gardens Shoreline, Queenstown Town Centre Waterfront Subzone,</u> as shown on the planning maps;</p>	NC	<p>Amendment to clarify which area the rule applies</p>
	<p>12.4.8.3 Buildings or boating craft within the Queenstown Town Centre Waterfront Subzone if used for visitor, residential or overnight accommodation, as shown on the planning maps.</p>	NC	

## 8. Conclusion

- 8.1 The QWZ is and will continue to be an important resource for Queenstown. By transferring the ODP provisions into the PDP without careful analysis or recognition of the changes that have occurred since the ODP was drafted poses significant risk. The provisions should be amended to clarify the location of the different areas to which the rules apply, and the objective and policies need amendment so that they provide better direction, to avoid degradation of the values that underpin the QWZ.
- 8.2 Council documents have for many years recognised the importance of the Lake as part of the passenger transport network. If the opportunity is not taken through this District Plan process, then applications for facilities necessary to support a passenger ferry service will struggle to obtain approval. Further, the QWZ is a finite resource and there is a risk that existing capacity will be taken up by alternative commercial activities.
- 8.3 I suggest significant changes to the objective and policies so that they provide greater direction in regards to the future management of the QWZ, and so that they support the provision of passenger transport. I also suggest amendments to the rules, providing

clarification as to where they apply, and providing greater support for passenger ferry services.

Jennifer Carter

18 November 2016