

# Wakatipu hearing of submissions to the Proposed Amendments to the Policy on Development Contributions



Monday 10 May  
2021



## Wakatipu hearing of submissions to the Proposed Amendments to the Policy on Development Contributions

Monday 10 May 2021 – To be held in the Council Chambers, 10 Gorge Road, Queenstown

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5.15pm	James Gardner-Hopkins	Glenpanel LP	15
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5.50pm	Terry Ngan	CP Group	34
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FINISH 6.20PM			

## DAN Wells

RCL Henley Downs Ltd

Queenstown/Wakatipu

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### Q. Responding to Climate Change

Please tell us what you think of Council's response and your thoughts on prioritisation and funding:

Please tell us more about your response:

Please tell us more about your response:

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Please tell us more about your response:

### Q. Please use this space to comment on the big issues or any aspect of the draft Ten Year Plan:

Note that some comments below under the DC policy section (such as the cost of the southern corridor wastewater pipeline) may also be relevant to the LTP. Also some comments overlap with the consultation on the Parks and Open Spaces Strategy

### Q. Please use this space to comment on the draft Policy on Development Contributions:

Wastewater

There is a significant increase in development contributions for wastewater. A significant contributor seems to be the wastewater project for the southern corridor. At over \$40 million this seems to be extremely high – several times more expensive than the project that RCL led to connect Hanley's Farm and the Jacks Point Village into the network. It is requested that a thorough independent review of the cost estimate and its underlying assumptions be undertaken before the LTP is adopted. Reducing estimated costs of the project would present opportunities both to reduce the development contributions levied on developers and free up Council budget for

other projects.

The draft LTP proposes spreading the cost of the southern corridor wastewater pipeline across the Queenstown development contribution area. RCL is concerned that burdening Hanley's Farm with the cost of this pipeline is unreasonable. RCL had to spend several million dollars in to extend a wastewater pipeline to meet the Council network. It would appear that Council proposes to build the pipe all the way to new developments in the southern corridor while subsidising the cost on developments such as Hanley's Farm which will not benefit from the works. RCL considers this to be inequitable, and not in the spirit of the agreement it entered into with Council over building this infrastructure.

#### Community facilities

A very large 175% increase is proposed over the current development contributions for this category. This raises questions as to whether the budget is falling disproportionately on new development – via development contributions (DCs) - rather than the existing rating base. An explanation of the split of proposed costs between new development (development contributions) and on existing residents (rates) is sought as we have not found it easy to ascertain this information from the consultation material. Depending on what that analysis shows, RCL considers that development contributions may need to be reduced to ensure a fair split.

#### Reserves

The increase in the reserve improvement development contributions is supported provided the intention to reduce the land area development contribution is confirmed. It is RCL's experience that the importance of the size of reserves can be overstated and that investment in improvements is often more important in achieving valued community spaces.

RCL questions how the premier sportsground referred to be funded (e.g. contribution of rates on existing properties vs DCs). If DCs for this purpose are needed the cost burden should not fall disproportionately on new development. An explanation of the split of proposed costs between new development (development contributions) and on existing residents (rates) is sought as we have not found it easy to ascertain this information from the consultation material. Depending on what that analysis shows, RCL considers that development contributions may need to be reduced to ensure a fair split.

It is helpful to have more guidance on reserves incorporated into the DC policy as the status of the reserve strategy when undertaking subdivisions that propose reserve land has been questionable. RCL considers that there is too much emphasis on predominantly flat spaces in the proposed document. Parks that use slope can, if well planned, be more interesting than flat spaces and provide views etc for public enjoyment. This should be considered on a case-by-case basis accounting for improvements proposed. It is recommended that the wording be softened on this matter.

The policies relating to development contributions and the Parks and Reserves Strategy indicate that DC credits for premier sports grounds are unlikely to be provided in instances where developers have undertaken works or provided land toward that purpose. It would be useful if the policy were amended to envisage situations where credits may be granted, as there may be opportunities where companies like RCL can work with Council to help provide such facilities.

Q. Please use this space to comment on the draft Policy on Significance and Engagement:

## FITZPATRICK Brian

Remarkables Park Ltd

Queenstown/Wakatipu

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Q. Please use this space to comment on the draft Policy on Development Contributions:

Q. Please use this space to comment on the draft Policy on Significance and Engagement:

Q. If you have a pre-prepared submission, you can upload it below.

## **Submission by Remarkables Park Limited (RPL) on the Development Contributions Policy**

### **1. Proposed increases to Development Contribution charges**

RPL is concerned by the huge level of the overall increase in the proposed Development Contribution charges that would be applied to developments in the Queenstown Lakes district. Development Contribution charges are based on a residential Dwelling Equivalent (DE). The new QLDC policy proposes a 38.8% increase in the amount that Council would collect on each new Dwelling Equivalent in Queenstown.

The increases from current levels are even more stark when considered individually:

- Community infrastructure 175% increase
- Premier Sportsground new charge \$500/DE
- Reserve Improvements no increase
- Stormwater 89% increase
- Transportation 31% decrease\*
- Wastewater 33% increase
- Water Supply 15% increase

\* Although there is a proposed decrease in the Transportation levy (and any decrease is to be encouraged) it needs to be pointed out that the new proposed transportation levy of \$3,437 per Dwelling Equivalent is still 48% higher than the transportation levy that applied just three years ago.

These charges are ultimately paid by the purchaser of a new house, apartment or business premises (usually with a mark-up applied by the developer to cover holding costs). RPL submits that Council needs to consider what signal this significant increase sends when central government and QLDC itself are calling out for better affordability and increased supply in the housing market. QLDC needs to think carefully about the charges and whether development contributions are the best, or only, way to fund infrastructure in the current environment.

### **2. A different approach to recovering the cost of growth-related infrastructure**

Traditionally councils have introduced development contributions in response to the argument that the cost of any new infrastructure that a Council may need to construct in order to accommodate growth (ie infrastructure beyond the roads and services that a subdividing developer constructs) should not be a burden on existing ratepayers but should be borne by the new development. There's nothing wrong with that as an argument about treating different groups of ratepayers equitably, but unfortunately most Councils make the assumption that the only way to ensure this is achieved is to collect a contribution in cash from the developer at the outset. However that charge immediately becomes a cost that the developer needs to recover as soon as possible and it automatically increases the initial price of the section, house or apartment he is selling and so makes housing less affordable.

In RPL's submission it would be preferable to apply a targeted rate to new developments that recovers Council's growth related costs from the ratepayers in the targeted area over

the life of the relevant assets. This would ensure that the growth-related costs were not borne by existing ratepayers (the owners of previously developed sites) but would also mean that the costs did not become another immediate barrier to new entrants in the property market. Importantly this could, in addition, serve to stop, or slow, the artificial inflation of existing house prices that the current system causes. (The vendor of a neighbouring property that has not had to pay development contributions can effectively add that amount on to his selling price to match what the market is paying for a new property).

It would be easy to respond that this would be too much of a change from how Council has always operated. One answer to that is that **radical changes** are required right now to deal with **housing affordability** and any proposal that could reduce the entry price of a new home in the Queenstown Lakes district by tens of thousands of dollars is worth investigating. The other response is that the proposed approach is actually no different to the mechanism that QLDC is proposing in its current Ten Year Plan for dealing with large infrastructure investment in the Queenstown town centre. Council has proposed a targeted rate on town centre properties that will help fund \$157m of infrastructure expenditure that primarily benefits the town centre. The analysis in the Ten Year Plan shows that Council is well able to apportion the benefits of each individual aspect of this infrastructure between ratepayers inside and outside the town centre rating area and also spread the recovery over a 30 year period, so that future generations contribute a fair share of the costs.

It might be easier for council to envisage this approach being used for greenfield development if it was considered in the context of the new development currently being undertaken by the Housing Trust at Jopp St in Arrowtown. The Trust is proposing to construct 68 new homes on a 3.6 hectare site that adjoins the southern boundary of Arrowtown. As the developer, the Trust will be faced with paying development contributions of \$1.122m before it can offer occupation of any of the new homes. As part of its development costs, these charges will undoubtedly be passed on by way of a \$16,500 addition to the cost of each home. The initial purchase price for buyers of these homes could instead be reduced by this amount if, rather than requiring the up-front payment of a development contribution for each unit in this 3.6ha block, Council was to charge a targeted rate to these units that would recover the contribution to "growth infrastructure" over a 30 year period (or longer, where appropriate for certain infrastructure). The rates paid by these units over future years would be a little higher than the rates charged for comparable units in other parts of Arrowtown but it would be a fair way of apportioning the costs of growth and would make this housing more affordable than the current QLDC practice.

It only requires a small shift in thinking to realise that the same approach could be applied to SHAs and then all greenfield development throughout the district, with potentially significant benefits for affordability. The system may not be as readily applicable to small brownfields or infill developments, where the area of land may be deemed to be too small for a targeted rate. For situations such as those, Council may want to retain the ability to charge a cash contribution at the time the development is undertaken. RPL would encourage Council to stop viewing development contributions as a means of "getting developers to pay for infrastructure". It needs to be understood that while the developer



may make the initial payment to Council, a developer will always recover those costs from the section purchaser or the first buyer of a new home. The impact of a development contribution on a residential property still falls on the first home buyer as an additional affordability hurdle on the purchase price. RPL submits that if Council is serious about wanting to address housing affordability it should address the way that it recovers the cost of “growth related infrastructure” from greenfield developments and properly investigate the use of targeted rates on new development areas. It would allow growth-related costs to be apportioned so that they do not fall on existing ratepayers and it would improve housing affordability.

Another benefit of using a targeted rate to recover the cost of growth related infrastructure is that it would introduce greater accuracy and reduce the room for unfairness in how DC charges are applied.

The current system is very sensitive to CAPEX being unintentionally over-estimated, through a conservative approach being taken to the future cost of capital works and/or the number of new dwelling equivalents being underestimated. A couple of theoretical examples may serve to illustrate the issue.

**Example #1 CAPEX overestimated**

CAPEX	Estimated	Actual
	\$6m	\$5m
Dwelling Equivalents	2,000	2,000
\$/DE	\$3,000 (charged at development)	\$2,500 (should have been charged)

**Example #2 Dwelling Equivalents underestimated**

CAPEX	Estimated	Actual
	\$6m	\$6m
Dwelling Equivalents	2,000	3,000
\$/DE	\$3,000 (charged at development)	\$2,000 (should have been charged)

**Example #3 CAPEX over estimated and DE’s underestimated**

CAPEX	Estimated	Actual
	\$6m	\$5m
Dwelling Equivalents	2,000	3,000
\$/DE	\$3,000 (charged at development)	\$1,667 (should have been charged)

Under the current system, where DC’s are collected only once and generally prior to the capital works required for growth (eg construction of a new water reservoir) being undertaken, any errors in CAPEX estimates or DE’s constructed can never be corrected. This can cause unfairness to the developer (who is never given a refund if the amount collected was too high) or to other developers (if the CAPEX was underestimated and a greater sum needs to be collected from future developments). A targeted rate, on the other hand, can be adjusted annually to take into account variations in the actual cost of capital works and/or the actual numbers of sections or DE’s developed.

### **3. Other Matters**

#### **3.1 Stormwater**

RPL does not propose to use this submission to go through the infrastructure investment tables line by line and discuss individual items. RPL has however noticed that the amount allocated for stormwater infrastructure investment at Remarkables Park over the next couple of years does not appear to be sufficient to cover the construction of stormwater treatment facilities and stormwater outfalls that have been discussed with QLDC staff and will be required over this time period. RPL requests that the required expenditure be checked with Council's staff and adjusted as necessary.

#### **3.2 Reserve Land Contributions**

On the positive side, it was good to see some more detailed thinking going into the rationale for where reserve land contributions will be required by Council and the introduction of maps defining parts of the district as Area A or Area B. RPL supports this change.

#### **3.3 Premier Sportsground Contribution**

The proposed new Premier Sportsground reserve land contribution charge of \$500 per DE is listed above. By way of clarification, it is noted that, if the need for such a community facility has been determined by Council and this is considered to be an appropriate way to fund an investment in a premier sportsground, then RPL is not opposed to such a charge being introduced and being collected by way of Development Contributions. RPL, in addition, submits that if a major developer was to provide such a premier sportsground, there should be a mechanism for Council to use money collected for the Premier Sportsground to contribute to such a facility.

#### **3.4 Inequitable Transportation Contributions**

RPL continues to register its objection to the anomaly between the way in which Council has determined that the Eastern Arterial Route / Hawthorne Drive is funded and the funding proposed by Council for Queenstown Town Centre road works, including the proposed Stage 2 arterial. For the past five years a targeted transportation development contribution has been charged to landowners whose properties adjoin the Eastern Arterial / Hawthorne Drive at the time their properties are developed. This is notwithstanding that this road is used as a bypass by thousands of vehicles daily. Yet in the case of the Stage 2 Town Centre Arterial, which is clearly intended to serve developments on Man street and Thompson Street, such as the Lakeview development, Council does not propose to charge a targeted Transport Development Contribution to owners of properties on that route. Instead it introduced an increased Transport Development Contribution that is charged to all developments in the Wakatipu basin. This is despite the situation that the proposed Town centre Stage 2 Arterial will never provide a bypass for the same volumes of daily traffic that Hawthorne Drive provides. The current mechanism treats property owners along Hawthorne Drive quite unfairly. There should either be targeted transportation development contributions for properties along both routes or the targeted transportation development contribution on Hawthorne Drive should be discontinued in favour of a flat Wakatipu Basin wide charge.

**Remarkables Park Limited**

**19 April 2021**

# FRENCH Pamela & John

French Burt Partners

Queenstown/Wakatipu

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## Q. Responding to Climate Change

Please tell us what you think of Council's response and your thoughts on prioritisation and funding:

We applaud QLDC's intention to address climate change issues. The details supplied so far, apart from three water services and transport needs, are too general for useful comment to be made; except we say we would not support the spending of money on reports and activities which are designed only to tick a box or to be merely going through the motions.

## Q. Big Issue 1: Delivering safe and reliable 3 water services for our community

I support OPTION ONE: Complete the Water Treatment Programme as outlined in the plan (by 2024)

Please tell us more about your response:

Obviously, water services are of vital importance and warrant the Option One priority. Already the infrastructure is overstretched. Failure to remedy this situation (which has been brought about by excessive development) exposes residents and the environment to the risk of likely failures and disasters.

This answer is subject to the points made later in this submission in the 10 year plan comments section.

## Q. Big Issue 2: Meeting the transport needs of our community and ensuring capacity and choice

I support OPTION ONE: Council confirms the prioritisation and funding or non-funding of transport projects as outlined

Please tell us more about your response:

The recent transport/roading/parking situation in Queenstown and environs (also brought about by excessive development and use) is dire and demands urgent remedial action. Good action has been taken already in this direction with the provision of improved public bus transport.

Again the answer to big issue two is subject to the points we have made in the comments section relating to the draft 10 year plan.

## Q. Big Issue 3: New Targeted Rate on Queenstown Town Centre properties

I support OPTION TWO: Apply costs to the existing Wakatipu Roding Rates

### Please tell us more about your response:

We definitely oppose Option One, which affects us directly and unfairly. Since 1989 we have owned a holiday crib at [REDACTED]. To impose rates as if we were in the CBD is arbitrary and discriminatory. Our house is an elderly (1910 or thereabouts) wooden house where we holiday at Christmas/New Year, Easter, School Holidays, long weekends and on other miscellaneous occasions. For many years, going back to the 1960's, we have holidayed in Queenstown. We have never rented out our crib nor derived any profit or income from it. It is a holiday residence. We have no intention of selling the property. Incidentally, we always walk from the crib whenever we go downtown.

Our crib is not part of the CBD. Altering the description of this area from wider CBD Zone (as it was in 2018) to Queenstown Town Centre does not alter the fact the implementation of Option One to Big Issue 3 would be based on a fiction. It would cause undue hardship to a family which has loyally supported Queenstown for many decades. No doubt there are others in the same position as us, including [REDACTED].

## Q. Big Issue 4: Increasing User Fees and Charges

I support OPTION ONE: Fees and Charges Increased as per Revenue & Financing Policy

### Please tell us more about your response:

This is the most equitable option.

## Q. Please use this space to comment on the big issues or any aspect of the draft Ten Year Plan:

Our submissions are accompanied by a copy of an article by Marc Scaife, an architectural designer from Queenstown. The article appeared in the edition of the Mountain Scene published on 4 March 2021. A summary of some of the points Mr. Scaife made are:

- (1) Commerce is not the same thing as the economy;
- (2) One of the elements of an economy is that it protects the community, its amenities and the environment;
- (3) In Queenstown's case, the increase of tourism has been achieved at a cost of the enjoyment of the amenities and the environment;
- (4) An upgrade of infrastructure does not address the problem;
- (5) Following COVID, tourism should be "set" at a level which protects the amenities and the environment.

The Mountain Scene article covers the issues in much more detail, and should be read in its entirety.

The points made by Mr. Scaife are relevant not only to Queenstown, but to the whole of the Wakatipu Basin.

Obviously QLDC's obligations include protection/enhancement of the environment and the amenities.

It is our submission Queenstown/Wakatipu Basin has reached a point where it can take no more "development". In fact, this unhappy state of affairs has existed for several years.

The cost of infrastructure is one thing. It is clear QLDC cannot afford the cost of infrastructure as matters stand. The proposal to rate residential owners, as if they were business/commercial operators, is proof positive of that proposition.

Not only is it a matter of inability to afford the cost, the present state of affairs is causing serious damage to the environment and to the enjoyment of the amenities.

We made this same point at the hearing in relation to the 2018 Ten Year Plan. The mayor's response was that QLDC could not prevent "people coming into Queenstown". We agree. However, QLDC can prevent further land becoming available for commercial and residential development.

It is well known from overseas experience that excessive tourism does serious (and often permanent) damage to the environment and amenities.

Queenstown/Wakatipu Basin can still be saved, but it is at a crossroads. We are gravely concerned at QLDC's draft Spatial Plan Summary, where at page 5 there is a list of priority development areas. The nature of the landscape is such that further development is not sustainable and will ultimately destroy the environment. As Mr. Scaife points out, our tourism is based on the clean green/natural landscape attractions.

The present Queenstown community, especially its mayor and councilors, are in a unique position to pull Queenstown from the brink and preserve its natural beauty/environment for future generations. The alternative legacy is too terrible to contemplate. The answer is no more land should be made available for commercial development, whether by zoning alterations or otherwise. The same applies to the making of land available for residential or similar uses.

We will be forwarding by email a scanned copy of Mr. Scaife's article.

**Q. Please use this space to comment on the draft Policy on Development Contributions:**

Q. Please use this space to comment on the draft Policy on Significance and Engagement:

## GARDNER-HOPKINS James

on behalf of Glenpanel LP

Queenstown/Wakatipu

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PDF submission attached

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19 April 2021

Let's Talk – QLDC consultation

By email: [letstalk@qldc.govt.nz](mailto:letstalk@qldc.govt.nz)

**LONG TERM PLAN (“LTP”) SUBMISSION: DEVELOPMENT CONTRIBUTION (“DC”) POLICY**

1. This letter briefly makes a submission on the DC Policy, part of the LTP, on behalf of Glenpanel LP.
2. The Council has proposed a significant update to its DC Policy.
3. The Submitter wishes to submit on the following matters:
  - (a) updates to DC levies where a new DC policy or update occurs after the original levy, but before construction occurs/ is complete;
  - (b) assessments where significantly lesser demand can be demonstrated; and
  - (c) developer agreements.
4. The Submitter wishes to ensure that any DC Policy is fair and appropriate, such that developers:
  - (a) have appropriate certainty for planning, even when projects span a change in DC Policy; and
  - (b) pay their fair share – but not significantly more than what fairly relates to the demand generated for and/or benefits received by a development from the works to which the DCs relate.
5. These matters are important generally, but even more so in the post-covid environment for Queenstown. The Submitter does not want to be in a position where it is paying greater than its fair share of DCs – and therefore effectively subsidising other developments.
6. The draft DC Policy currently proposes:
  - (a) For “purely” residential developments (excluding visitor accommodation), that the “entire” DCs will be assessed at the time of subdivision consent<sup>1</sup> – ie there will be no further DC assessment at the building consent stage. The approach

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<sup>1</sup> [2.2.1.1]



of “locking in” DCs at the subdivision stage is supported, however, the requirement for a proposal to be “purely residential” could be problematic in practice. For example, an application could include a small visitor accommodation component; or some ancillary commercial or other activities. The approach should apply where a proposal is for “predominantly” residential development. Otherwise, proposals that should obtain the benefit of this policy will miss out; or applications might be staged to include all the residential aspects as one application, and the ancillary aspects as a subsequent stage.

- (b) For non-residential (including visitor accommodation), a “portion” of the DC is to be levied at the time of subdivision, with the “remainder” levied at the time of building consent.<sup>2</sup> This is even where a proposal includes both a subdivision component and the land use consents necessary to identify the relevant building footprints and uses with appropriate certainty. A key issue in respect of the “remainder” is that the assessment at building consent stage will take place against the DC policy in place at the time building consent is sought – even if the building footprints and uses have not changed. This is a significant concern for the Submitter, as it is entirely possible (and has occurred in the past) that significant new DCs can be introduced between policies. This means that the development feasibilities can be significantly impacted, and that developer has no certainty as to a final DC. There is no logic as to why residential and non-residential proposals should be treated so differently. A fairer approach would be if, at the building consent stage, it is apparent that demand has increased because of a greater footprint or change in final use, then any increase be assessed against the DC Policy in place at the relevant time.
- (c) That payment be made:<sup>3</sup>
  - (i) For a subdivision – prior to the issue of s224c;
  - (ii) For a land use consent – the earlier of receipt of the DC notice or prior to the consent’s commencements; or
  - (iii) For building consent, prior to issue of a CCC.

The Submitter understands the Council’s wish to have DCs paid at the earliest possible opportunity. However, the timing of payment should broadly correspond with the timing of generation of demand. Provision should be made in the Policy for some

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<sup>2</sup> [2.2.1.1]

<sup>3</sup> [2.2.5]

flexibility. For example, with a major residential development, the Submitter may seek to obtain subdivision and land use consents, obtain s224c certification, for that major development; but then develop the units in stages prior to sale and settlement, and therefore the generation of any income from the project will be staggered, as will any actual demand. There may be some years, between consenting and use – and no demand being generated until use occurs. The Council should have a policy that enables deferred payments, if necessary secured by a bond or a mechanism, if DCs have been assessed but not paid at an early stage, for CCC not to be issued until payment of DCs has been satisfied.

- (d) In respect of Development Agreements (“**DA**”),<sup>4</sup> a restriction on such agreements to circumstances where a developer will fund particular infrastructure. While that may be one circumstance where a DA would be appropriate, there could be many other circumstances where a DA is warranted – such as where a comprehensive development is proposed. This was recognised in previous DC Policies, which provided an open-ended ability for the Council to enter into a Developer Agreement. This is appropriate, as flexibility needs to be maintained for the varied circumstances that might arise.
  - (e) As for Special Assessments (“**SA**”),<sup>5</sup> where a proposal will generate a significantly different (particularly, for a developer, a lesser) demand than anticipated, the Council has sought to limit the availability of such an assessment – by imposing a requirement that the development have less than half the anticipated demand. This is unduly restrictive, as it would exclude a development that had 60% (say) of demand anticipated by the usual DC formula. This would still be a significant difference in DCs. Any cut-off should be meaningful (say, 25%), or the Council left with a wider discretion, depending on the circumstances. Otherwise, developments with significantly less demand characteristics (but not less than half) will not get any recognition for their lesser demand.
7. The Council has generally been very rigorous in its consideration of any requests for a SA or other basis for a reduction in DCs (eg that a particular building generates no demand itself).
  8. It is concerned that the changes proposed to the DC Policy will make it too difficult for deserving projects to have a fair reduction in DCs. That is not only unfair and unreasonable, but also risks such costs

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<sup>4</sup> [2.2.9]

<sup>5</sup> [3.4.5]

being passed on to purchasers – all contributing to unaffordability in Queenstown that is well known and well publicised.

9. Ensuring that a fairer approach to DCs can be taken is the appropriate response. Otherwise, a developer may have no option but to use the objection process, to additional cost, time and effort for all parties.
10. For all these reasons, the Submitter respectfully requests that the concerns it has recorded above are appropriately addressed in an updated DC Policy for adoption by the Council. It would be happy to work with officials on the drafting, should the Council's elected representatives agree with the submission and direct officers to do so.
11. The Submitter currently wishes to be heard in support of its submission, and reserves the right to provide further information in support of the submission at the hearing.

Yours faithfully  
James Gardner-Hopkins



**JGH BARRISTER**  
BSC | LLB (hons)

[Redacted]

[Redacted]

## GARDNER-HOPKINS James

on behalf of: Gibbston Valley Station

Queenstown/Wakatipu

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2. The Council has proposed a significant update to its DC Policy.
3. GVS has had previous experience with past DC Policies, and wishes to submit on the following matters:
  - (a) updates to DC levies where a new DC policy or update occurs after the original levy, but before construction occurs/ is complete;
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  - (c) developer agreements.
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<sup>1</sup> [2.2.1.1]

DC assessment at the building consent stage. The approach of “locking in” DCs at the subdivision stage is supported, however, the requirement for a proposal to be “purely residential” could be problematic in practice. For example, an application could include a small visitor accommodation component; or some ancillary commercial or other activities. The approach should apply where a proposal is for “predominantly” residential development. Otherwise, proposals that should obtain the benefit of this policy will miss out; or applications might be staged to include all the residential aspects as one application, and the ancillary aspects as a subsequent stage.

- (b) For non-residential (including visitor accommodation), a “portion” of the DC is to be levied at the time of subdivision, with the “remainder” levied at the time of building consent.<sup>2</sup> This is even where a proposal includes both a subdivision component and the land use consents necessary to identify the relevant building footprints and uses with appropriate certainty. A key issue in respect of the “remainder” is that the assessment at building consent stage will take place against the DC policy in place at the time building consent is sought – even if the building footprints and uses have not changed. This is a significant concern for GVS, as it is entirely possible (and has occurred in the past) that significant new DCs can be introduced between policies. This means that the development feasibilities can be significantly impacted, and that developer has no certainty as to a final DC. There is no logic as to why residential and non-residential proposals should be treated so differently. A fairer approach would be if, at the building consent stage, it is apparent that demand has increased because of a greater footprint or change in final use, then any increase be assessed against the DC Policy in place at the relevant time. In practical terms, if the nature, scale or intensity of a proposal changed sufficiently to make a material difference, then the consent holder should be obtaining a variation to its resource consent. Even in the case of some sort of “envelope consent”, the scope can’t be expanded without further authorisation – only reduced or modified within the envelope.

In respect of both (a) and (b) above, it may often be the case, whether for residential or non-residential development (including visitor accommodation) that the development will be structured without subdivision, ie so only land use consents are required (in terms of *resource* consents), with *building* consents then following. Again, building consents should not be able to increase the footprint of any buildings

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<sup>2</sup> [2.2.1.1]

authorised by a resource consent. This all suggests that DCs will usually be able to be assessed at the RC stage. A developer should then be able to rely on that assessment in taking their consent to the market, and understanding price, margins, etc for construction, development etc – even if building consents come some years later. If there had to be cut off period, after which reassessment would be required, then that should be tied to the timeframe by which a consent is to be implemented; or, in the case of “long-term” consents (ie with lapse periods of over 5 years) a 5 year period. That also provides some incentive for developers to “get on with it”.

- (c) That payment be made:<sup>3</sup>
  - (i) For a subdivision – prior to the issue of s224c;
  - (ii) For a land use consent – the earlier of receipt of the DC notice or prior to the consent’s commencements; or
  - (iii) For building consent, prior to issue of a CCC.

GVS understands the Council’s wish to have DCs paid at the earliest possible opportunity. However, the timing of payment should broadly correspond with the timing of generation of demand. Provision should be made in the Policy for some flexibility. For example, with a residential development at the Gibbston Resort, GVS may seek to obtain the subdivision and land use consents, obtain s224c certification, and then develop the units prior to sale and settlement, and therefore the generation of any income from the project. There may be some years, between consenting and use – and no demand being generated until use occurs. The Council should have a policy that enables deferred payments, if necessary secured by a bond or a mechanism, if DCs have been assessed but not paid at an early stage, then CCC will not be issued until payment of DCs has been satisfied.

- (d) In respect of Development Agreements (“DA”),<sup>4</sup> a restriction on such agreements to circumstances where a developer will fund particular infrastructure. While that may be one circumstance where a DA would be appropriate, there could be many other circumstances where a DA is warranted – such as for the particular circumstances of the GVS Resort Zone. This was recognised in previous DC Policies, which provided an open-ended ability for the Council to enter into

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<sup>3</sup> [2.2.5]

<sup>4</sup> [2.2.9]

a Developer Agreement. This is appropriate, as flexibility needs to be maintained for the varied circumstances that might arise. For example, in the case of GVS, much of the infrastructure (if not all) within the resort will remain privately owned. There will be burden on the Council for the development of that infrastructure (and it will not then take it over for long term maintenance). For GVS, it is some way from the urban centres and is only accessed from the State Highway. This is a matter that fairly requires consideration, as the Council is not responsible for development of the State Highway network. Certainly, many of GVS' guests will impose a limited burden on new Council roads to which the DCs will relate.

(e) As for Special Assessments (“SA”),<sup>5</sup> where a proposal will generate a significantly different (particularly, for a developer, a lesser) demand than anticipated, the Council has sought to limit the availability of such an assessment – by imposing a requirement that the development have less than half the anticipated demand. This is unduly restrictive, as it would exclude a development that had 60% (say) of demand anticipated by the usual DC formula. This would still be a significant difference in DCs. Any cut-off should be meaningful (say, 25%), or the Council left with a wider discretion, depending on the circumstances. Otherwise, developments with significantly less demand characteristics (but not less than half) will not get any recognition for their lesser demand.

7. The Council has, in GVS' experience, been very rigorous in its consideration of any requests for a SA or other basis for a reduction in DCs (eg that a particular building generates no demand itself).
8. It is concerned that the changes proposed to the DC Policy will make it too difficult for deserving projects to have a fair reduction in DCs. That is not only unfair and unreasonable, but also risks such costs being passed on to purchasers – all contributing to unaffordability in Queenstown that is well known and well publicised.
9. Ensuring that a fairer approach to DCs can be taken is the appropriate response. Otherwise, a developer may have no option but to use the objection process, to additional cost, time and effort for all parties.
10. For all these reasons, GVS respectfully requests that the concerns it has recorded above are appropriately addressed in an updated DC Policy for adoption by the Council. It would be happy to work with officials on the drafting, should the Council's elected representatives agree with the submission and direct officers to do so.

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<sup>5</sup> [3.4.5]



11. While potentially an “off the wall idea” GVS would be willing to work with Council to develop a bespoke DC policy for its Resort Zone. That would certainly provide some rigour and certainty to the DCs to be applied to development within the Zone – while avoiding piecemeal and successive debates about what DCs should fairly be imposed.
12. The Submitter currently wishes to be heard in support of its submission, and reserves the right to provide further information in support of the submission at the hearing.

Yours faithfully  
James Gardner-Hopkins



**JGH BARRISTER**  
BSC | LLB (hons)

[Redacted contact information]

## GEDDES Nick

Clark Fortune McDonald

Queenstown/Wakatipu

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### Q. Responding to Climate Change

Please tell us what you think of Council's response and your thoughts on prioritisation and funding:

Please tell us more about your response:

Please tell us more about your response:

Please tell us more about your response:

Please tell us more about your response:

Q. Please use this space to comment on the big issues or any aspect of the draft Ten Year Plan:

Q. Please use this space to comment on the draft Policy on Development Contributions:

Q. Please use this space to comment on the draft Policy on Significance and Engagement:

## HARMAN John

Queenstown/Wakatipu

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### Q. Responding to Climate Change

Please tell us what you think of Council's response and your thoughts on prioritisation and funding:

### Q. Big Issue 1: Delivering safe and reliable 3 water services for our community

Neither / Neutral

Please tell us more about your response:

We should not be truck sewage to a land fill

### Q. Big Issue 2: Meeting the transport needs of our community and ensuring capacity and choice

Neither / Neutral

Please tell us more about your response:

The plan is completely wrong

### Q. Big Issue 3: New Targeted Rate on Queenstown Town Centre properties

I support OPTION TWO: Apply costs to the existing Wakatipu Roding Rates

Please tell us more about your response:

All benefit all should pay . It is quite frankly absurd and misleading to say all rate payers closer to CBD benefit by pedestrianisation , in fact we suffer .

### Q. Big Issue 4: Increasing User Fees and Charges

I support OPTION ONE: Fees and Charges Increased as per Revenue & Financing Policy

Please tell us more about your response:

## Q. Please use this space to comment on the big issues or any aspect of the draft Ten Year Plan:

We need no cars in central CBD service vehicles and golf carts only with bikes and pedestrian . We need huge carparkon cemetery site . With two lane hiway in and out .

All rental cars and bikes located in this car park

All buses into and out of this 7 storey car park . There should be Tunnel under car park to link up to Glenorchy rd

## Q. Please use this space to comment on the draft Policy on Development Contributions:

## Q. Please use this space to comment on the draft Policy on Significance and Engagement:

## HEALY Mike

Queenstown/Wakatipu

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### Q. Responding to Climate Change

Please tell us what you think of Council's response and your thoughts on prioritisation and funding:

The focus of this submission is to oppose the Council's unnecessary investment in the Cardrona Water Scheme

### Q. Big Issue 1: Delivering safe and reliable 3 water services for our community

Neither / Neutral

Please tell us more about your response:

The focus of this submission is to oppose the Council's unnecessary investment in the Cardrona Water Scheme

### Q. Big Issue 2: Meeting the transport needs of our community and ensuring capacity and choice

Neither / Neutral

Please tell us more about your response:

The focus of this submission is to oppose the Council's unnecessary investment in the Cardrona Water Scheme

### Q. Big Issue 3: New Targeted Rate on Queenstown Town Centre properties

Neither / Neutral

Please tell us more about your response:

The focus of this submission is to oppose the Council's unnecessary investment in the Cardrona Water Scheme

### Q. Big Issue 4: Increasing User Fees and Charges

Neither / Neutral

Please tell us more about your response:

The focus of this submission is to oppose the Council's unnecessary investment in the Cardrona Water Scheme

## Q. Please use this space to comment on the big issues or any aspect of the draft Ten Year Plan:

The Council has presented its investment in a new water treatment plant at Cardrona as a decision that it has already made. This is misleading, as the Council has specifically deferred that decision to await the outcome of the LTP process. The cost is stated in most places at \$8.1M, but a further cost 10 years from now is also given of \$11.5M; ie amounting to \$19.6M. Funding remains unclear as it is stated at one point as being from rates, and at another point from development contributions. In neither case does the LTP disclose what the targeted rates, connection charges, or development contributions will be.

See attached.

## Q. Please use this space to comment on the draft Policy on Development Contributions:

The DC policy identifies costs beyond \$8.1M, with nearly \$14M costs identified for Water Supply headworks, and \$2.5M for pipeline works. It also fails to identify what development contribution is to be levied in new development at Cardrona (nor are targeted rates or connection charges identified).

This makes it impossible for developers/ ratepayers to understand the costs of the scheme to them. If those affected cannot understand this, then they cannot provide meaningful feedback and the LTP process is fundamentally flawed.

## Q. Please use this space to comment on the draft Policy on Significance and Engagement:

N/A

## LEE MICHAEL

Wanaka/Upper Clutha area

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### Q. Responding to Climate Change

Please tell us what you think of Council's response and your thoughts on prioritisation and funding:

The focus of the submission is to oppose the Council's unnecessary investment in the Cardrona Water Scheme

### Q. Big Issue 1: Delivering safe and reliable 3 water services for our community

Neither / Neutral

Please tell us more about your response:

The focus of the submission is to oppose the Council's unnecessary investment in the Cardrona Water Scheme

### Q. Big Issue 2: Meeting the transport needs of our community and ensuring capacity and choice

Neither / Neutral

Please tell us more about your response:

The focus of the submission is to oppose the Council's unnecessary investment in the Cardrona Water Scheme

### Q. Big Issue 3: New Targeted Rate on Queenstown Town Centre properties

Neither / Neutral

Please tell us more about your response:

The focus of the submission is to oppose the Council's unnecessary investment in the Cardrona Water Scheme

### Q. Big Issue 4: Increasing User Fees and Charges

Neither / Neutral

Please tell us more about your response:

The focus of the submission is to oppose the Council's unnecessary investment in the Cardrona Water Scheme

## Q. Please use this space to comment on the big issues or any aspect of the draft Ten Year Plan:

The Council has presented its investment in a new water treatment plant at Cardrona as a decision that it has already made. This is misleading as the Council has specifically deferred that decision to await the outcome of the LTP process. The cost is stated in most places at \$8.1M, but a further cost 10 years from now is also given of \$11.5M; i.e amounting to \$19.6M. Funding remains unclear as it is stated at one point as being from rates, and at another point from development contributions. In neither case does the LTP disclose what the targeted rates, connection charges, or development contributions will be.

## Q. Please use this space to comment on the draft Policy on Development Contributions:

The DC policy identifies costs beyond \$8.1M with nearly \$14m costs identified for water supply headworks, and \$2.5M for pipeline works. It also fails to identify what development contribution is to be levied in new development at Cardrona (nor are targeted rates or connection fees identified.)

This makes it impossible for developers/ratepayers to understand the costs of the Scheme to them. If those affected cannot understand this, then they cannot provide meaningful feedback and the LTP process is fundamentally flawed.

## Q. Please use this space to comment on the draft Policy on Significance and Engagement:

n/a

## Q. If you have a pre-prepared submission, you can upload it below.

Please note that we can only accept .docx files.

Additional documents or PDF files can be emailed to [letstalk@qldc.govt.nz](mailto:letstalk@qldc.govt.nz)

Submission on the LT1.docx



**Submission on the LTP – Cardrona Water Supply**

1. *The Council's spend, of at least \$8.1M (if not up to \$19.6M), on the Cardrona Water Supply scheme is strongly opposed.*

2. *This is because:*

*(a) The Council has not demonstrated a need to invest in the scheme.*

*(b) In particular:*

*(i) the Council has not demonstrated a need in terms of water quantity. Sufficient quantity of water supply already exists for Cardrona Village through the existing private schemes (and their consents); and*

*(ii) to the extent that the Council considered there to be a need to intervene to ensure water quality standards are achieved, because of existing failures, it acted on incorrect and incomplete information, which it did not give the existing suppliers the opportunity to respond to. The current systems and operations will achieve the appropriate standards.*

*(c) The Council therefore has no need to invest in a competing system.*

*(d) This is particularly the case where:*

*(i) the new system is a joint venture with a private developer, where the Council has refused to disclose the financial terms of that agreement;*

*(ii) the Council has not, in its LTP, identified transparently the costs to ratepayers and/or developers through rates, connection charges, and/or development contributions;*

*(iii) any connection costs, for those with existing connections or contracts with the current operators will be an additional cost to them;*

*(iv) the Cardrona Village Community has overwhelmingly told the Council that it does not want the Council to invest in a new system (but there has been no evidence that this direct feedback has ever been given to the Councillors);*

*(v) Council's plans are based on an expansion of the Mt Cardrona Station (MCS) water scheme, which will be vested in Council when operational. However, the MCS water consents specifically state that water can only be used for the MCS development. It cannot be used to supply Cardrona Village. It would be financially irresponsible for Council to set aside funds in the LTP for a water supply to Cardrona Village when it does not have ORC water consents that allow provision of supply to the Cardrona Village; and*

*(vi) the Council has refused to, or has at least failed to take any positive steps towards, the solution tabled by the Cardrona Valley Residents and Ratepayers Society and the two existing water supply operators, that each party "engage an independent consultant to examine the existing scheme to determine whether or not the replacement system was necessary given the current systems water quality, availability infrastructure and associated cost benefits".*

3. *Councillors are requested, at the very least, to pause and defer making a decision to fund the new Cardrona Water Supply scheme until the process identified above has been undertaken; or it otherwise has better, independent, information before it on these matters.*

## NGAN Terry

CP Group

Queenstown/Wakatipu

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### Q. Responding to Climate Change

Please tell us what you think of Council's response and your thoughts on prioritisation and funding:

Very important to practise and supply climate change

### Q. Big Issue 1: Delivering safe and reliable 3 water services for our community

I support OPTION TWO: Spread the Water Treatment Programme over the ten years

Please tell us more about your response:

### Q. Big Issue 2: Meeting the transport needs of our community and ensuring capacity and choice

I support OPTION TWO: Council reconsiders prioritisation and funding or non-funding of one or more transport projects

Please tell us more about your response:

### Q. Big Issue 3: New Targeted Rate on Queenstown Town Centre properties

I support OPTION ONE: Rates recovery focused on wider CBD ratepayers

Please tell us more about your response:

### Q. Big Issue 4: Increasing User Fees and Charges

I support OPTION TWO: Fees and Charges not increased

Please tell us more about your response:

**Q.** Please use this space to comment on the big issues or any aspect of the draft Ten Year Plan:

**Q.** Please use this space to comment on the draft Policy on Development Contributions:

**Q.** Please use this space to comment on the draft Policy on Significance and Engagement:

**Q.** If you have a pre-prepared submission, you can upload it below.

Please note that we can only accept .docx files.  
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Submission by CP Group on QDLC 10 Year Plan 2021\_2031.docx

**Submission by CP Group Ltd ultimate owners of Mercure Queenstown Resort Sainsbury Road ,  
Fernhill , on the Visitor Levy proposed in Queenstown District Lakes Council 10 Year Plan 2021-  
2031.**

1. The Visitor Levy is not explained in any detail. How it will work or what will be the costs on accommodation providers?
2. We cannot presume that a visitor levy can be passed through to the end consumer or guest. Meaning this will be an additional cost on accommodation providers on top of recent minimum wages increases and increased sick leave entitlements. So it is important that costs are known and a consultation process is carried out with those ratepayers most likely to be affected.
3. Now is certainly not the time for new taxes, when tourism, the most significant part of Queenstown's economy has been decimated by border closures. All accommodation providers have exhausted their financial reserves during the extended border closure period and do not need an additional cost burden as they attempt to get back from the edge of financial collapse. It is noted that many providers have already ceased trading.
4. Bed taxes or targeted rates on accommodation providers are not equitable as they ignore the other parts of the tourism economy – restaurants, shops, tours, that benefit from local and international tourists. Accommodation providers only receive a smallish portion of the total visitor spend.
5. Building of new roads should not fall on a small proportion of the ratepayer database. Money for roads, should if part of state highways come from NZTA, and for local roads should come from a local or regional petrol tax such as Auckland City has instituted.
6. A proposed visitor levy , even if only 5% of room rate, will on top of GST collected by central government make Queenstown one of the most taxed resort destinations in the world. Now is certainly not the time to increase taxes as there is no certainty that past visitor levels will be achieved for many years.
7. All tourists to Queenstown pay GST @ 15 % on all their expenditure and unlike NZ residents receive no benefits in return. Central Government should assist Queenstown on major capital projects given the very small ratepayer base of the district and the key role that Queenstown plays in drawing overseas tourists to New Zealand.
8. The 10 year plan talks of \$162m being collected over the last 7 years of the plan. This is \$23m per annum. That is a lot of additional cost for local accommodation providers to bear. It is nearly double the amount being rated by Auckland Council which most ratepayers are struggling to pay in these depressed times. This rough calculation will mean that approximately 10 % of Queenstown's rates will be levied off approximately 2 % of ratepayers.
9. If there is to be any visitor levy then the present differential rate on Accommodation should be removed so there is not a , "plus plus plus charging regime" , by that we mean multiple levels of additional charges on accommodation providers.
10. Additional revenue should come from a levy on all travellers through Qtn airport; perhaps a differential levy for domestic versus overseas arrivals. A regional petrol tax will spread the cost equally across all users of the roading network. These two measures will widen the revenue base and provide more equity.

Terry Ngan

Prakash Pandey

## NOBELL Franco

The Kiwi Kit Community Trust

Queenstown/Wakatipu

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### Q. Responding to Climate Change

Please tell us what you think of Council's response and your thoughts on prioritisation and funding:

In order to respond to Climate Change, we will promote change behaviours in the community, running a "Migrant community garden", in collaboration with the "Queenstown community gardens", where we will facilitate a plot for the migrant community, in order to learn and connect through gardening. A space to understand how to compost and grow organic seasonal food, while we create new friends and connect with the whole community.

### Q. Big Issue 1: Delivering safe and reliable 3 water services for our community

Neither / Neutral

Please tell us more about your response:

.

### Q. Big Issue 2: Meeting the transport needs of our community and ensuring capacity and choice

Neither / Neutral

Please tell us more about your response:

.

### Q. Big Issue 3: New Targeted Rate on Queenstown Town Centre properties

Neither / Neutral

Please tell us more about your response:

.

## Q. Big Issue 4: Increasing User Fees and Charges

Neither / Neutral

Please tell us more about your response:

.

## Q. Please use this space to comment on the big issues or any aspect of the draft Ten Year Plan:

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## Q. Please use this space to comment on the draft Policy on Development Contributions:

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## Q. Please use this space to comment on the draft Policy on Significance and Engagement:

In accordance with Volume One. Draft, Ten Year Plan 2021-31, The Kiwi Kit Community Trust will like to contribute and engage with the community, with the following goals:

#Thriving people  
#Disaster- Defying Resilience  
#Embracing the Maori world  
#Opportunities for all

-----

#Thriving people  
WHAKAPUAWAI HAPORI

1) We will co-create with stakeholders an " Ethnic festival" where every Ethnic Community will be able to show their culture. This will be an event, where every community member will be able to participate, feel welcome and enjoy seeing their culture being expressed to the whole community.

2) Psychological First Aid to the migrant community, in collaboration with New Zealand Red Cross.

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#Disaster- Defying Resilience  
HE HAPORI AUMANGEA

1) We will collaborate with New Zealand Red Cross in a program about "Disaster prepare for the migrant community" for everyone under a temporary visa holder in QLD.

In order to understand the gap in the community, please see the information below, extracted from the Quality of life 2020:

(...)

#### PREPAREDNESS

##### RESIDENTS THAT ARE PERSONALLY UNPREPARED FOR AN EMERGENCY

-More likely to be on an essential skills visa (60%)

Quality of Life 2020 Report. [PDF]. (2020, December). Queenstown: Queenstown Lakes District Council. pages 75, 76

(...)

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#Embracing the Maori world  
WHAKATINANA TE AO MAORI

1) We will do activities and workshops linking the Maori Community and the migrant community, learning about Te Ao Maori, Waiata and Te reo Maori.

As one of the Core values of The Kiwi Kit Community Trust is: WHANAUNGATANGA / Sense of Belonging & Connection.

We would like to engage the migrant community with the Maori Culture.

We have done 4 workshops in the community, "The Great Migrant Brainstorm" the main purpose was to know what the community needs. More knowledge of the Maori Culture was something that came up a lot, most of all the migrant community would like to know more about the Maori Culture and we believe this will be very useful to engage the migrant community with Maori Culture.

In order to understand the gap in the community, please see the information below, extracted from the Quality of life 2020:

(...)

Although not a significant number of respondents commented on this, there was certainly a greater focus this year on Maori culture. The majority of these comments encouraged greater integration of the Maori culture in the district. This was primarily encouraged through greater use of Te Reo and greater recognition of Maori culture generally.

"I would like Maori art/ language/culture represented more in public spaces and communication, similar to what North Island communities offer."

"We need to do more in respect to normalising Maori culture and making it part of everyday life."

Quality of Life 2020 Report. [PDF]. (2020, December). Queenstown: Queenstown Lakes District Council. page 58.

(...)

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#Opportunities for all  
He ohaka taurikura

## 1) Skilled Migrant fair.

One of the community needs that came in "The Great Migrant Brainstorm" was the need for the migrant community to show their skills, most of the attendants said, they feel they are not using all their skills due visa conditions, lack of english knowledge and lack of ethnic diversity in leadership position in organizations and companies.

We will run an event where the migrant community would be able to show their skills, studies and what they can offer to the community.

We will invite the whole community including employers to meet them and see what a skilled migrant can offer to their organisations and the community.

In the same fair, we will run workshops, where members of the migrant community will:

- Share their professional skills
- Explain how their profession is done in their home country
- Teach the community how to do something, how to create, play music, or just learn something fun.



## WALKER Michael

on behalf of: Pembroke Terrace Limited

Queenstown/Wakatipu

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### Q. Responding to Climate Change

Please tell us what you think of Council's response and your thoughts on prioritisation and funding:

Please tell us more about your response:

Please tell us more about your response:

Please tell us more about your response:

Please tell us more about your response:

Q. Please use this space to comment on the big issues or any aspect of the draft Ten Year Plan:

Q. Please use this space to comment on the draft Policy on Development Contributions:

PDF submission attached

Q. Please use this space to comment on the draft Policy on Significance and Engagement:

**SUBMISSION ON QUEENSTOWN LAKES DISTRICT COUNCIL LONG TERM PLAN  
2021/2031**

**To:** Queenstown Lakes District Council  
Private Bag 50072, Queenstown 9348

**Name of Submitter:** Pembroke Terrace Limited

**Address:** c/o Todd & Walker Law [REDACTED]

**Prepared by:** Michael Walker (Counsel for Pembroke Terrace Limited)

Pembroke Terrace Limited (**Pembroke**), wishes to be heard in support of this submission.

1. The submission focuses on the proposed development contribution figures contained within the draft Long-Term Plan 2021/2031 (**LTP**). The Submitter wishes to raise queries in relation to the calculations of the figures contained in the proposed development contributions materials as currently drafted in the Long-Term Plan 2021/2031. In particular focusing on the Wanaka catchment of the LTP.
2. Both Avalon Station Drive and Gordon Road extensions, should be included in the LTP.
3. Several Council policy documents show a connection from Cardrona Valley Road through to Ballantyne Road via Gordon Road and Avalon Station Drive. The most recent of which appears to the Wanaka Network Operating Framework (**NOF**).
4. The LTP should encompass Community Infrastructure items as provided for by developers to vest with Council and flexibility should be provided specifically in the LTP to allow for these.
5. In terms of development contributions and the need and ability to trace, dollar for dollar, the contribution into the infrastructure in which it is to be apportioned for. It is particularly difficult when reviewing the Councils draft LTP to understand what exactly the figures contained in the draft LTP relate to as the descriptions in the assets schedule aren't accurately described in any detail.
6. Please provide details on how the impact of Covid 19 has impacted the growth and demand modelling and when that was last updated.