

**Material presented by ZJV (NZ) Limited on Stage 3 of the Queenstown Lakes Proposed District Plan, Hearing Stream 16 – matters specific to Wāhi Tūpuna
Tuesday, 7 July 2020**

1. My name is Trent Yeo. I am the director of ZJV (NZ) Ltd (known as **Ziptrek Ecotours**) which is an adventure ecotourism business on Bob's Peak and takes guests on guided zipline tours from the top of the Ben Lomond Reserve, through forest canopy and connecting aerial treetop platforms that descend the mountain. Environmental sustainability is at the heart of our business and we have won numerous sustainability business awards since opening in 2009. We run and support numerous social and environmental initiatives in the community, run solar power systems, plant thousands of native trees, repatriate biodiversity through wilding removal and pest removal, are soon to be Future Fit internationally benchmarked and the only tourism business to be certified zero carbon in the district.
2. Ziptrek Ecotours supports the intent of Chapter 39 and has reviewed the Council's latest version. It is concerned that the proposed Chapter 39 will create unnecessary costs, delays and uncertainty for very minor works that Ziptrek Ecotours seeks to undertake.
3. ZJV's submission on the Proposed Plan concerns:
 - (a) The extent of the mapping of the wāhi tūpuna overlay on Queenstown Hill in that it is large and very general;
 - (b) The permitted earthworks allowance within that area, being 10m³ where in the underlying Informal Recreation zone, the permitted allowance is 100m³; and
 - (c) The drafting in Chapter 39 be revisited to clarify whether the standards were applying only to "identified" wāhi tūpuna areas. In the latest version of the provisions, I see that the term "identified" is proposed to be included, which essentially addresses the uncertainty in drafting issue.

How the rules apply to Ziptrek Ecotours

4. Ziptrek's operations are within Te Taumata o Hakitekura (Site 27) which is listed specifically in proposed Rule 25.5.11 as being subject to the 10m³ restriction on earthworks. The site is valued as wāhi toaka¹. The threats are:
 - (a) Exotic species including wilding pines;
 - (b) Buildings and structures, utilities;
 - (c) New roads or additions/alterations to existing roads, vehicle tracks and driveways; and
 - (d) Activities affecting the ridgeline and upper slopes.

¹ Resources, places and sites treasured by tangata whenua. These valued places reflect the long history and association of Ngāi Tahu with the Queenstown Lakes District.

5. Even if Site 27 were not included in Rule 25.5.11, Rule 25.5.22 would apply as our location is above 400masl, except at the very base.
6. Rule 25.3.2.9 provides that earthworks shall be calculated by the sum of all earth that is moved within a site and includes the total of any *combined* cut and fill per 12 month period. This constrains the make up of the 10m³ allowance.

What Ziptrek Ecotours seeks and why

7. Primarily, we seek that the permitted earthworks allowance be increased to 100m³ so that consent is not required for the minor activities that we seek to undertake. Another option that reflects our submission would be to consider Site 27 itself with greater specificity to determine what this receiving environment can in fact handle, setting a threshold no more restrictive than required to appropriately address adverse environmental effects.
8. I recognise that Mr Bathgate's evidence states that some wāhi tūpuna are of particularly high value, particularly those considered tapu, and will be especially sensitive to any modification by earthworks². But the wāhi tūpuna area affecting our site is a large landscape within which it seems that minor earthworks cannot cause such an effect that it needs to be considered through a resource consent process. There is no clear explanation of why the 10m³ threshold is appropriate.
9. I also note that many of the other sites list "earthworks" as a specific threat, but Site 27 does not. It lists "activities affecting the ridgeline and upper slopes", so it is not clear that minor earthworks will even be a concern, because it is so general. On the other hand, the rule will have an impact on Ziptrek Ecotours operations in terms of the costs of consenting and delays in processing the consents.
10. Scale and extent: The area we lightly inhabit is of steep to very steep, highly treed and on a landscape scale. On a steep site it is very easy to exceed 10m³ with any land work undertaken. We try not to undertake too many works in order not to impact the environment unnecessarily, but cases where we might need to move land are where there has been natural land slippage over our trails due to natural erosion, new trails or track maintenance, planting or ecological land improvement and maintaining our treetop platforms.
11. In the case of this Active Recreation zone the scale of our impact is miniscule compared with that of the Skyline Gondola, Mountain Bike Park and in fact almost every other recreation type.

² At paragraphs 62 (first bullet) and 74.