

**BEFORE THE HEARING COMMISSIONERS  
AT QUEENSTOWN**

**IN THE MATTER** of the Resource Management Act 1991  
**(the Act)**

**AND**

**IN THE MATTER** of the Queenstown Lakes Proposed  
District Plan: Stage 3b – Chapter 46 (Rural  
Visitor Zone)

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**LEGAL SUBMISSIONS ON BEHALF OF MATAKAURI LODGE LIMITED IN  
RELATION TO RURAL VISITOR ZONE**

**JULY 2020**

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## INTRODUCTION AND OVERVIEW

1. Matakauri Lodge Limited (**MLL**) operates Matakauri Lodge, a world class luxury lodge located on the shores of Lake Wakatipu, on the southern side of Farrycroft Row, at 569 Glenorchy – Queenstown Road. Matakauri Lodge is one of the three Robertson-owned luxury lodges in New Zealand - the other two being Cape Kidnappers in Hawkes Bay and Kauri Cliffs in Northland.



Figure 1: Photograph of Matakauri Lodge

2. While the site is nominally only 8 kilometres from the heart of Queenstown, it provides a private and semi-remote experience, in an area dominated by the mountains and spectacular mountain and lake views.



Figure 2: Location of Matakauri Lodge

3. The use of the site for visitor accommodation is long-standing, with the first consent for a visitor accommodation facility having been granted over 20 years ago. MLL purchased the Lodge in 2009, and undertook a significant programme of works to upgrade, redevelop, replant and generally improve both the accommodation facilities and services as well as the overall site – with major native planting and landscaping.
4. MLL has made a significant investment in developing Matakauri Lodge to the high-quality, world-class guest accommodation facility it is today. Matakauri Lodge was recently ranked as one of the top five resorts in Australia and New Zealand in the Travel and Leisure 'World's Best Awards' 2019.
5. The three Robertson Lodges, including Matakauri, have been accepted as members of the Relais and Chateau Association. Only five other accommodation venues in New Zealand have reached the standards of quality and guest experience to be admitted to membership of this prestigious international guest accommodation Association.
6. MLL seeks to ensure that the proposed Queenstown Lakes District Plan (**PDP**) appropriately recognises and provides for Matakauri Lodge both now and into the future. Matakauri Lodge is currently closed for renovation work and will open again in October 2020.
7. In 2017 MLL lodged a resource consent for additions to the Lodge designed by Warren and Mahoney. The total building coverage was 2,460m<sup>2</sup>. This application was placed on hold pending a relatively large investment in renovating the existing Lodge accommodation and major upgrades to wastewater treatment and kitchen facilities. Currently the main Lodge building is having the roof replaced.

### **Evidence**

8. MLL's position in support of seeking a site zoning change is supported by expert evidence from the following expert witnesses:
  - (a) Jason Bartlett, an experienced traffic and transportation engineer and director of Bartlett Consulting Limited;

- (b) Rebecca Lucas, a senior landscape architect and director of Lucas and Dey; and
  - (c) Scott Freeman, an experienced locally based planning expert and director of Southern Planning Group.
9. With the exception of certain resolvable concerns over potential landscape impacts (difference between 2,000m<sup>2</sup> and 2,500m<sup>2</sup> building coverage) and traffic safety, there is no real disagreement between the Council planner and Mr Freeman in accepting that the Rural Visitor Zone (**RVZ**) is more appropriate than the current Rural Lifestyle Zone (**RLZ**) (which is primarily intended for rural residences and farming). The two main issues to resolve are:
- (a) Landscape – including building site coverage (2,000 m<sup>2</sup> or 2,500m<sup>2</sup>).
  - (b) Traffic safety – associated with any future expansion of the Lodge.

#### **Landscape – Site Coverage**

10. In their evidence the Council planner, Emily Grace, and landscape expert, Matthew Jones, both agreed in principle that the RVZ is a more appropriate zone than the RLZ subject to a detailed landscape assessment being undertaken which identifies areas of moderate-high and high landscape sensitivity.
11. This detailed landscape assessment has now been provided by Rebecca Lucas. The evidence of Rebecca Lucas outlines a detailed assessment which identified the need for controls on development in the RVZ relating to the location, height, density, form, materials and site coverage of development. Ms Lucas' evidence then concluded that, with such appropriate restrictions and controls imposed, future development can be undertaken in the area that would protect the landscape values of the Outstanding Natural Landscape (ONL)<sup>1</sup>.
12. Ms Lucas' evidence included an assessment of the site attributes, which found that the site was suitable for rezoning as a RVZ due to factors including its location within an ONL,

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<sup>1</sup> Statement of Evidence of Rebecca Lucas, 30 April 2020, at [57].

the modified yet remote character of the existing development, identified topographical areas suitable for development, access, and existing vegetation to screen and absorb built form.

13. It is noted that the resource consent for expansion of the Lodge (increasing site coverage to 2,460m<sup>2</sup>) which is currently on hold, was assessed by Queenstown Lakes District Council (**QLDC**) expert landscape advisor, Dr Marion Read. It is also noted that no rationale for a limit of 2,000m<sup>2</sup> was provided by Mr Jones for QLDC.

### **Traffic**

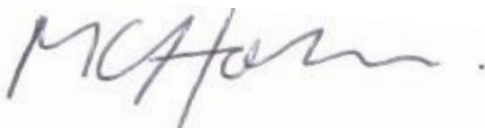
14. It is accepted that any future increase in accommodation (up to a site coverage of 2,500m<sup>2</sup>) will need to be assessed from a traffic management and safety viewpoint.
15. Mr Freeman and Mr Bartlett have suggested provisions to be added to a Matakauri RVZ which would ensure all relevant traffic management issues can be considered in any future resource consent application.
16. In relation to future road upgrades, this will be a matter primarily for MLL to agree with the Department of Conservation (**DOC**) as owner of land across which the current Right of Way is located.
17. As noted by Mr Freeman, the MLL relationship with DOC has been and continues to be mutually constructive and co-operative. The two parties have already co-operated on road upgrades, removal of wilding pines, native planting and the lease of DOC land adjacent to the Lodge for utilities and storage.
18. Mr Freeman has proposed the inclusion of specific traffic management provisions in the proposed Matakauri RVZ. This will ensure any resource consent application for increasing accommodation will be able to fully consider the traffic matters outlined by Mr Bartlett – and the concerns of Mr Smith of Stantec, adviser to QLDC on this issue.

### **Changes to provisions**

19. The changes MLL now seek relate to transport and parking, and building site coverage for development in the RVZ and are summarised by Mr Freeman as:

- (a) Adding the PDP Transport Chapter 29 into provision 46.3;
  - (b) Adding additional transportation matters of control in terms of Rule 46.4.6;
  - (c) Amending Rule 46.5.2.1 to exclude the site from the 500m<sup>2</sup> total maximum ground floor area limitation;
  - (d) Adding a new rule (Rule 46.5.2.2) that provides a total maximum ground floor area of 2,500m<sup>2</sup> for the site (plus adding traffic generation as a matter of discretion, if this rule is breached); and
  - (e) Adding a new rule (Rule 46.5.XX) that requires a 10m building separation requirement for buildings within the site and native planting between buildings.
20. The bespoke provisions sought are necessary due to the considered approach to development by Matakauri Lodge previously and the protection required for the ONL on which it sits.

**DATE:** July 2020



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