

**BEFORE THE QUEENSTOWN LAKES
DISTRICT COUNCIL**

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

AND

IN THE MATTER of the Queenstown Lakes Proposed District
Plan – Stage 3b Rural Visitor Zone

Statement of Evidence of

Richard George Burdon

For Glen Dene Limited & R&S Burdon #31043

29 May 2020

Introduction:

1. My name is Richard George Burdon. I hold the qualifications of a Diploma of Farm Management from Lincoln University. The land where the holiday park exists was originally part of my grandfather George Burdon's property Mt Burke Station and was taken under the Public Works Act when the lake was raised.
2. The Camp was created with the reserve area making up some 15 hectares we were left with an adjoining area of 7 ha which even though is zoned rural it has no use for farming purposes as it conflicts with the running of the camp.
3. My wife Sarah and I bought the Holiday Park in 2009 from the Cotter family who started the camp and ran it for over 40 years. Glen Dene Ltd (the Burdon family's high country farm) owns the land surrounding the campground to the east and north of the Campground.
4. Since then and running the park for nearly ten years we have diversified our business into a world class accommodation, hunting and fishing operation with a Gold Qualmark standard, so that we are not totally reliant on farming. Our tourism sector namely hosting and the hunting/fishing operation (using existing resources of land and lake) compliments and ties in with our investment at the Camp and is important that we can build suitable accommodation in part to also house our guests from these other operations as well as to expand The Camp's offering in terms of visitor accommodation and enhanced camp facilities.

Summary:

5. The Rural Visitor Zone provides for a range of visitor accommodation and tourist recreation activities in a rural setting. The chapter aims to help ensure visitor industry activities in this zone are applied appropriately across our district and that rural landscapes are maintained and protected for generations to come.
6. The Lake Hawea holiday park which is now known as "The Camp" is a perfect fit for the Rural Visitor Zone. There is little other land zoned in Hawea for visitor accommodation growth in the next ten to fifteen years, yet it is one of the fastest growing towns in the District.

7. What we have said in our Stage 2 submission is that the submission (and appeal) on Stage 1 which sought Rural Visitor Zone status remains current for us. The Stage 2 submission supported Community Facility – Campground on the Council owned land (Sec 2 Blk II Lower Hawea Survey District) and seeks the same on the Glen Dene owned land to the north and west of the campground (Lots 1 and 2 DP 418972). The Stage 2 submission still has a clear vision for the future zoning of the Glen Dene land between the campground and the highway, meaning that the proposed Rural Visitor zone sought by the Stage 1 submission is still the preference for this land.

8. We totally support the comments of QLDC Planning and Policy Manager Ian Bayliss:

“the aim of the Rural Visitor Zone is to manage visitor accommodation and tourist recreation activities in relatively remote rural locations many of which are within outstanding natural landscapes.”

9. Our current situation finds us in a position whereby the Glen Dene team who have made a substantial investment over the past ten years to improve and diversify the camping experience have been side-lined by the bureaucratic planning process of the QLDC. We have consulted and shared information but we have never been given the opportunity to sit down and talk with the Council as owners of the land currently designated as Campground. The only response from planners is in the form of reports which appear to have little relation to the unique situation we are in.

10. There seems to be no understanding of the Lake Hawea community we live and work in. The reports demonstrate a lack of consultation and are weak on community feedback. Which begs the question “How can we all really be on the same page?”

11. The definition below succinctly describes the land we seek to have rezoned:

1.2 The RVZ is intended to provide for and manage visitor industry activities within the rural environment of the District, specifically the Outstanding Natural Landscapes (ONL). The RVZ is designed to provide for visitor industry facilities on sites that are too small to likely be appropriate for resort zoning (i.e. a stand-alone special zone), and the principal activity is visitor accommodation and smaller scale commercial recreation activities, rather than a separate resort or special zone that is centred around substantial recreation activities (i.e. Millbrook Chapter 43 and the establishment and ongoing use of golf courses).

12. Glen Dene's view is that the District Plan review process has been appallingly handled and is fundamentally flawed. The Council and their planners could have consulted with us and the community to get a better understanding of the area and what we are trying to achieve at "The Camp". The process has meant that the issue of the zoning of the campground and surrounding sites has been spread over three hearings with Queenstown Lakes District Council inviting submissions on Stage 3b of the Queenstown Lakes Proposed District Plan: Chapter 46 Rural Visitor Zone, and a variation to Chapter 38 Open Space and Recreation in November 2019. To date we have had no consultation with the planners or Council in respect of any of these stages of the Review of the District Plan.
- 13 With respect to the proposal in this District Plan process to retain the Open Space and Recreation Zone (Community Purpose – Campground subzone.) we would prefer Rural Visitor Zoning Rural Visitor Zone would enable us to develop the Camp in a comprehensive manner. I feel it is important to point out to the commissioners that as a Lessee of the Council we still need the Council sign off and approval for just about everything we do in the park (e.g. even removing trees) as this is part of our lease.

Background:

14. In 1959 Lake Hawea was raised by 60 feet and less than a kilometre away from the existing Camp a dam was built. George Burdon, my grandfather, lost around 800 acres of productive low-lying land, which was taken under the Public Works Act.
15. In reality Lake Hawea and surroundings are is a highly modified hydro lake with a large concrete dam and an existing commercial camping ground in close proximity to Lake Hawea township which has been established for the last fifty years. Given these man-made modifications the lake and its immediate surrounds must be at the lower end of the ONL spectrum.
16. As we are all entering a new world we need to allow for progress. The planners and Council should be looking into the future, trying to engage the community in this District Plan review and investigating how they can include good visitor accommodation options.

Value to the Community:

17. Glen Dene is an internationally recognised business with a Gold Qualmark company providing accommodation, goods and services that generate revenue for New Zealand and this District. We are reasonable employers in this District, our staff are important to us and providing the Rural Visitor Zoning enables new opportunities, and that will support us, our staff, the Lake Hawea community and of course QLDC as our Landlords.
18. We all understand the enormous growth we have experienced throughout the district and how much Lake Hawea township has grown and is still expected to grow and change and the ongoing issues with accommodation and freedom camping. Demand for camping ground facilities such as those we provide and of the type we wish to provide arising from this growth has been incredible. Just the sheer increase in numbers of tourists that were in NZ pre Covid-19 and the inability for the community to cope with them is testament to the fact that we need more visitor accommodation.

Value to Tourism:

19. The Camp offers a range of accommodation options from budget through to high end 'glamping'. A major focus in our investment and approach has been on providing domestic visitors a traditional kiwi campground experience. We cater to a large number of families seeking a budget holiday together in a beautiful environment. We highlight the attractions of the Lake Hawea area which has little in the way of large tourism ventures and strongly promote smaller local operators.
20. Our visitors walk, cycle, boat and generally have an active outdoor experience which involves little in the way of infrastructure other than appreciating the environment.

Environmental Impact:

21. When viewed from the highway you may see glimpses of the camp through the existing vegetation. But you will see there is some 20-metre height difference from the Road to the camp as well as the trees that partially screen the view of the camp. Whilst from the Lake Hawea township you may see motor homes, caravans and tents set amongst a park like setting which is a view which is at least a one kilometre away and has been similar view for the last 50 years.

22. The landscape assessment shows clearly that views from the Highway will not be affected. The highway sits at 370 metres above sea level and looks out across the Park hidden by the fact the camp is at a level of around 350 Metres above sea level. Then as well the whole area is covered in a forested park-like setting with many of the trees creating a buffer between the road and the lake.
23. We have made significant investments in sustainable waste management, water quality and landscaping and intend to do the same for any future development.

Challenges with the Review Process:

24. We have been personally drained (mentally and financially) by the lengthy expensive process of the Review of the District Plan. In addition the consenting process is getting harder and becoming more detailed and expensive and to my way of thinking the planners are looking at the Zone changes more like Resources Consents rather than long term planning zoning for the District that will facilitate development and make appropriate development easier to consent. Also in making the process more complicated and expensive it seems like their only focus is about visibility of development and an assumption that any visible development is adverse We challenge that is correct given the context and the fact that we are talking about land that is designated and already used as a camping ground. Given such why should development intended to facilitate camping and visitor accommodation be seen as an adverse visual effect?
25. The Zone change is important to us as we are impacted by ever increasing costs. For example:
 - Six weeks to signoff consent to establish a food truck in the camp going through numerous layers of Council staff and contractors and receiving lengthy reports which appear to have little to do with our situation.
 - Council planners visiting “The Camp” without making efforts to meet the applicants to review consents without discussion which we consider unreasonable. This just should not be happening with a project of such small scale and lack of complexity.

- There appears to be a fundamental error in some of the rules surrounding visitor accommodation. A building permit to put up a tent in a commercial camping ground is required but freedom camping and Air B&B operations appear to have no such requirements. Freedom Campers appear to be able to camp in any non-urban area and cause all sorts of uncontrolled adverse environmental effects and do not contribute to the Council rates, yet we are required to follow this expensive and lengthy process to help facilitate camping on land designated for that purpose. We feel the Council should be more understanding of our situation as we are improving their asset and providing solutions to the accommodation problems.
- Health and Safety issues with trees and council contractors in the Park.
- No management plan for reserves, therefore a lack of direction and understanding by Council staff.
- Lengthy and expensive legal costs to sort out the ability to make a consents and loan over the existing recreation licences.
- A Landscape planner who required trees to be planted in the operating easement outside the camp boundaries to screen a tent. When we are in an existing campground surrounded by beautiful trees.

Background up until Stage 3 District Plan.

26. Prior to Covid 19 QLDC Council was facing enormous growth and development of this district and from its own research it was experiencing enormous visitor demand with up to 34 international visitors per 1 ratepayer. Hence the focus for the next ten to fifteen years should be, and needs to be, providing more visitor accommodation, whilst remaining in control of sustainability and environmental outcomes.
27. A Reserve Management Plan would help the Council manage the reserves in the district for those key areas that are experiencing growth and change, so that planners and QLDC know about the different areas in the district they manage. We do acknowledge from the previous stages of the District Plan Review that Designation

172 now covers the whole of the Council owned reserve containing most of the campground.

28. As the Council has identified in the ten-year plan there are a huge number of Issues that require upgrading from improved parking across the district, infrastructure upgrades and many roading issues to meet the proposed 150,000 district wide peak population projected for 2028. I feel it critical that the council plan now for new areas of visitor accommodation for all forms of traveller.

29. Glen Dene has sought Rural Visitor Zone for the subject land and notes the lack of further submissions opposing the submission. Glen Dene Limited lodged similar submissions on Stage 1 seeking the application of the Rural Visitor Zone to Lots 1 and 2 DP 418972 and the Council-owned campground. The notification of Stage 2 overtook that process with the consequence that the Hearing Panel was only able to make recommendations on the parts of the submissions relating to the privately-owned land. In considering this issue, the Hearing Panel was mindful of the Council's undertaking contained in the Memorandum dated 23 November 2017 that the "Council will receive and consider submissions in Stage 2." Hence we had to be involved in the District Plan Review right through each of the stages, which was hugely frustrating and incurred substantial cost to our business.

Key Points District Plan Looking Forward to the Future:

30. Queenstown Lakes has been the fastest growing district in New Zealand and should remain in the top areas of growth post Covid 19.

31. Queenstown Lakes District Council faces the same challenge as many of us running a business and need to be careful they are not only addressing their needs but also the needs of ratepayers who are running businesses in the District. With Covid-19 affecting many of our business we are really relying on Council support to make these zoning changes to help the district get back on its feet.

32. Based on evidence supplied by QLDC around the ten-year community plan, where it expects peak visitor numbers up to 34 visitors per one ratepayer per day, our QLDC community faces the daunting challenge of not just providing accommodation for the tourists but also for all the staff required to help run and manage these businesses.

33. None of us want to see the continuation of freedom campers degrading the landscape and environment that makes our community so special. We feel the Council should be working hard to support growth and developments of its existing camps within the region to help mitigate the environmental issues that are being created from so much uncontrolled freedom camping.
34. The detailed business case analysis done earlier this year that occurs during the 10 year District Plan Review has already been proven outdated given the figures on population projections, where current townships like Lake Hawea, could double in size. Yet the Council struggle to allocate time to work with us on visitor accommodation for Lake Hawea. I believe that we are the only business/area that applied for this zoning in the whole Hawea area, yet Council staff and consultants who have no detailed knowledge of what is occurring in our community have recommended against the rezoning.
35. As the district grows QLDC must allow the people that run businesses to grow as well and it needs to consider at times like this the importance of social and economic wellbeing that are essential to the recovery of the region.
36. We need to be acutely mindful of the cost associated with doing business within the district. It is an important aspect to the tourism business in the district and is considered expensive, time consuming and difficult. Any improvements would be appreciated.
37. Not addressing the zoning issues around visitor accommodation will mean QLDC will not have the infrastructure and accommodation that is required for this community going forward for the next twenty years.
38. Sarah has an eco-tourism degree. We have been working closely with our planning, team of consultants and legal advisors. We have put considerable effort into working on design, water, waste, environmental effect, and surveying toward camp development. This should give the Council confidence that there is a good team behind this proposal to rezone the Camp into RVZ, with owners who have a good track record and as long term residents are passionate about the area they live in.
39. We can speak with confidence that our team of professional advisors would not support us if they did not believe in what we have proposed with RVZ, the zone change and the conditions we are seeking, are the right zoning for this area. These are some of

the most respected professional advisors that live in this district and all have long term credibility as planners and advisors.

40. "The Camp" and the Glen Dene land area are managed as one. This goes back to when we split the two titles of the farming area and merged these areas with the adjacent campground as it had no farming value. It has been our long-term goal to achieve Rural Visitor Zone right across both the camp and the immediately adjacent Glen Dene land.
41. This Zone change will be beneficial to the people that live in our district, the visitors to our district and the Lake Hawea community, the Council, and the wider district.
42. Both Richard & Sarah Burdon have been working on this District Plan since 2015. We have a clear long-term vision for The Camp to make it sustainable and eco-friendly and it will be something this district will be proud to call a community asset.
43. We have invested an enormous amount of time and energy into creating a great camp. The three glamping areas, recreational dome, food truck, upgraded power sites and landscaping are all allowing wonderful camping experiences. People are enjoying the quiet enjoyment, the open space camping and park like setting we offer in the camp. Children can run freely, people can relax and enjoy a lakeside holiday. It is what the market is seeking. We are also hoping to be able to include the Glen Dene land into "The Camp" to provide for this wide-open space camping opportunity but need your support with rezoning it to Rural Visitor Zone to achieve this.
44. We have also invested in upgraded facilities, electrical and switch board services and accessibility for our customers and following reports and discussions with Council we've upgraded waste systems and bathroom facilities. We would like to share this with the planners and commissioners as we aware you are just looking at this from a zone change not from a resource consent process or an operational aspect.
45. It also important to note that as we lease the Park from the QLDC Council, we do have to work with the Council to share our vision as well as listen to them about what they need from us. As lessees we do meet and work with the Council and have responsibilities to report and plan with them. We need their consent to progress any development in the park, so we would describe this as a good process and this should give the commissioners some confidence that the council would be involved in each of

the development stages we go through. Providing for this growth would be unsustainable if incorrect zoning were applied as the Council costs in consenting such development would make it financially impossible.

46. Evidence of high costs are as follows. Glen Dene spent \$230,000.00 in planning and reporting in the last three years, prior to getting a post in the ground or a building started. This amount was horrendous, but this is our passion and goals and we can see the vision that others may not.
47. The Upper Clutha has only two real drivers of economic activity, farming, and tourism. The planning industry seems to concentrate almost exclusively on landscape considerations and ignores the need for communities to provide for their economic wellbeing. When an existing commercial camp has operated since around 1971 then I would see after 50 years that it would be a natural fit to extend this into the adjoining land area.
48. A simple SWOT analysis of what we just experienced around the world with Covid-19 would say that with any threat comes opportunity. Our opportunity will be our ongoing input into how we can focus on rebuilding our majestic district.