

**BEFORE THE HEARINGS PANEL
FOR THE PROPOSED QUEENSTOWN LAKES DISTRICT PLAN**

IN THE MATTER of the Resource
Management Act 1991

AND

IN THE MATTER of the Hearing Stream
13 – Queenstown
Mapping Annotations
and Rezoning Requests

**STATEMENT OF EVIDENCE OF GLENN ALISTER DAVIS
ON BEHALF OF QUEENSTOWN LAKES DISTRICT COUNCIL**

ECOLOGY

24 May 2017

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1. INTRODUCTION

- 1.1 My full name is Glenn Alister Davis. I am Director and Principal Environmental Scientist of Davis Consulting Group Limited (**DCG**). I have been in this position since 2007. I have 20 years' postgraduate work experience in environmental management. I have a BSc in Ecology and MSc in Geography. I am a member of the New Zealand Plant Conservation Network.
- 1.2 I have worked as a professional ecologist in the Queenstown Lakes District (**District**) for the last 10 years. During this time, I have worked on a wide range of projects for the agricultural and land development sectors and for Queenstown Lakes District Council (**QLDC** or **Council**). In addition, I have also held a contract with Land Information New Zealand to support the assessment of discretionary activities on high country pastoral leases under the Crown Pastoral Lease Act. Many of these projects have triggered the Operative District Plan (**ODP**) indigenous vegetation site standard. I therefore have a sound working knowledge of the indigenous vegetation protection measures within the ODP.
- 1.3 In 2009 I was engaged by QLDC to commence the first stage of the process to identify, assess and include further areas of significant indigenous vegetation and significant habitats of indigenous fauna, as outlined in Appendix 5 of the ODP (Appendix A to my evidence presented at the Rural hearing [**CB48**]). I completed this first stage (initial identification) in collaboration with three Queenstown based ecologists - Neill Simpson, Dawn Palmer and Simon Beale. In conjunction with QLDC I have implemented Stages 2, 3 and 4 of the Assessment Criteria.
- 1.4 I have provided evidence on behalf of the Council in relation to Chapter 33 (Indigenous Vegetation & Biodiversity) of the Proposed District Plan (**PDP**) in Hearing Stream 02, in relation to the Ski Area Subzones rezoning submissions (Hearing Stream 11), and in relation to the Upper Clutha rezoning submissions (Hearing Stream 12).

- 1.5** I have now been engaged by QLDC to provide evidence in relation to the Queenstown rezonings hearing stream of the Proposed District Plan (**PDP**).
- 1.6** Although this is a Council hearing, I confirm that I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2014 and that I agree to comply with it. I confirm that I have considered all the material facts that I am aware of that might alter or detract from the opinions that I express, and that this evidence is within my area of expertise, except where I state that I am relying on the evidence of another person.
- 1.7** I refer to documents included in the Council's Bundle (**CB**), Supplementary Bundle (**SB**) and Second Supplementary Bundle of Documents (**SSB**). The key documents I have used, or referred to, in forming my view while preparing this brief of evidence are:
- (a) my evidence for the Rural Hearing Stream 02, dated 6 April 2016 [**CB48**];
 - (b) Section 42A report for Indigenous Vegetation Chapter 33 dated 7 April 2016 [**CB45**];
 - (c) Right of Reply for Indigenous Vegetation Chapter 33 dated 3 June 2016 [**CB46**];
 - (d) Reply Chapter 33, Indigenous Vegetation and Biodiversity [**CB22**]; and
 - (e) Ms Banks' strategic evidence for this hearing.
- 1.8** All references to PDP provision numbers, are to the Council's Reply version of those provisions (unless otherwise stated).

2. SCOPE

- 2.1** I consider, from an ecological perspective, specific Stage 1 rezoning submissions located within the Queenstown area, where ecology matters are relevant. In addition, my evidence also addresses the submissions seeking to alter the boundaries of Significant Natural Areas (**SNAs**), which the Panel deferred in its Fifth Procedural Minute.¹
- 2.2** The individual submissions have been broadly categorised into the following groups:
- (a) **1A** Queenstown Urban – Business and Industrial;
 - (b) **1B** Queenstown Urban – Frankton and South (includes Kelvin Heights, Lake Johnson, Jacks Point);
 - (c) **1C** Queenstown Urban – Central, West and Arthurs Point (includes Queenstown Hill, Fernhill/Sunshine Bay, Gorge Road, Arthurs Point);
 - (d) **1D** Queenstown Urban – Jacks Point; and
 - (e) **2** Rural.
- 2.3** I have taken a view on the site-specific rezoning requests as to whether the relief sought, in terms of ecological effects is opposed, or whether I do not oppose the relief sought.
- 2.4** In assessing the site-specific submissions, I have considered the ecological environment present within the areas sought to be rezoned and considered the significance of indigenous vegetation and habitats present at each site. Based on this assessment I then considered the effect the relief sought could have on the existing ecological values.
- 2.5** I have read Ms Banks' strategic evidence for this hearing, in particular the part where she explains each of the zones in issue. I refer to and rely on that evidence, in terms of the type and densities of zones that the Council has recommended through its right of replies on the text of the PDP. I have used the Council's reply position on all zones, when considering their appropriateness.

¹ Fifth Procedural Minute – Submissions concerning Significant Natural Areas dated 19 April 2016.

3. EXECUTIVE SUMMARY

3.1 In conclusion, the key findings from my evidence are that:

- (a) although the Lake Wakatipu Station Limited (702) submission requests a refinement in the boundary of SNA C24A, the adjustment requested is consistent with the notified SNA boundary and therefore no change is needed;
- (b) I do not oppose any of the rezoning requests within the urban environments;
- (c) I do not oppose the majority of the submissions on the urban rural fringe, as most of the indigenous vegetation has been removed from these areas. I do however oppose the submissions described in points (d)-(i) below;
- (d) I oppose the High Density Residential (**HDR**) zone requested by F. S. Mee Developments (429) as the site contains rocky outcrops and small bluffs that may provide good habitat for skinks and geckos. These ecological values should be assessed to confirm the suitability of the site for higher density development;
- (e) I oppose the Glentui Heights submission (694) to rezone the Bobs Cove sub zone to Rural Residential Zone, on the basis that the Bobs Cove sub zone provisions provides better guidance on the maintenance of existing indigenous vegetation and restoration requirements;
- (f) I oppose the Bobs Cove Developments Limited submission (712) to rezone land in Bobs Cove from Rural to Rural Residential Zone, on the basis that the zoning would result in the removal of a significant area of the indigenous vegetation on the site. It would also be difficult for rural residential development at the site to meet Objective 22.2.7 (Bobs Cove Rural Residential Zone) – *'To maintain and*

enhance the ecological and amenity values of the Bobs Cove Residential Zone;

- (g) I oppose the Te Anau Developments Limited submission (607) on the basis that it includes indigenous vegetation within the marginal strip and the submission does not provide details on the footprint of development within this zone;
- (h) I oppose the submission by Middleton Trustees (393) for the establishment of an Airport Mixed Use Zone on the top of Queenstown Hill, due to a lack of information regarding the footprint of the proposed zone and lack of ecological assessment provided; and
- (i) I oppose the submission by Amrta Land Ltd (677) to rezone Woodbine Station from Rural to (operative) Rural Visitor or (PDP) Rural Lifestyle with a Visitor Accommodation overlay, based on the regenerating indigenous vegetation on the site and lack of detail regarding the activities that may be associated with the rezoning proposal.

4. BACKGROUND

- 4.1 I provided ecological evidence to the Rural Hearing Stream 2 (in relation to Indigenous Vegetation and Biodiversity Chapter 33, and Wilding Exotic Tree Chapter 34) **[CB48]**. This evidence discussed the Significant Indigenous Vegetation and Habitats project I undertook on behalf of the Council, background to the ecological communities present in the District and the appropriate use of the Threatened Environment Classification (**TEC**) (in section 4), current protection for biodiversity under the ODP (in section 5), set out the assessment process and methodology (in section 6), and presented evidence in support of a number of Significant Natural Areas (**SNAs**) where submissions were received opposing their inclusion in the PDP (in section 8). My evidence also addressed submissions on the objectives and policies set out in the PDP (in section 7).

- 4.2** In assessing the site-specific submissions, I have considered the ecological values present on each site (i.e. vegetation and habitats) based on field and desktop assessments and prior local knowledge of the Queenstown area. Site visits were undertaken during March and April 2017. Site visits were only undertaken on properties where I required a greater understanding of the ecology of the site/area.
- 4.3** The assessment criteria utilised in the evaluation of the sites is consistent with the criteria utilised in the SNA process. The key SNA criteria in the assessment process include:
- (a) whether there is any indigenous vegetation values and/or habitat remaining on the site;
 - (b) whether the vegetation and habitat contains rare or distinct values;
 - (c) the representativeness of the vegetation and habitat present;
 - (d) the diversity of the species and habitat present; and
 - (e) the ecological context.
- 4.4** The Queenstown District and the land that is the subject of this hearing covers a diverse range of physical environments and are represented in a total of five ecological districts including the Aspiring, Richardson, Shotover, Remarkables and Eyre Ecological Districts. Ecological districts are defined by their geological, topographical, climatic and biological features and processes.
- 4.5** Much of the lowland valley floor and lower slopes that are the subject of the Queenstown Mapping hearing have been developed for agricultural purposes or townships, which has resulted in the removal of the majority of the indigenous ecological systems. Based on the TEC, the valley floor and lower mountain slopes below approximately 500 metres above sea level (**masl**) east of Queenstown, contains less than 20% indigenous vegetation cover. The loss of indigenous cover is most acute on the valley floors where less than 10% remains.
- 4.6** The hillslopes up to an elevation of approximately 800 masl consist of land developed for pastoral activity (cleared, oversown and

topdressed). However, indigenous ecosystems remain and include wetlands, semi native pasture/short tussock communities, grey shrubland in the drier parts of the district and stands of manuka woodland and broadleaved indigenous hardwoods in the wetter areas. Stands of beech forest are also present that represent the original pre-settlement vegetation cover in the wetter parts of the district from the western slopes of the Remarkables through to Mt Aspiring National Park.

4.7 At higher elevations above approximately 900 masl, tall tussock grassland, alpine short tussock grasslands, cushionfields and wetlands predominate. Much of the alpine communities are highly representative of the original pre-settlement vegetation cover.

5. REQUESTS FOR REZONINGS – RURAL (2)

Lloyd James Veint, Arcadia Station - 480, Temple Peak Ltd - 486, and Cabo Limited - 481

5.1 No ecological comment is required, as these submissions provide general comments in support of the PDP.

Lake Wakatipu Station Limited - 702

5.2 Lake Wakatipu Station has sought a realignment of SNA C24A to assist with stock control through this area while maintaining the core values of the SNA.

5.3 I have worked with the submitter on this proposal and can confirm that the black dotted line on the site plan is consistent with my consultation on this SNA. The black dotted line is also consistent with the notified C24A SNA, which means that the submission was incorrect in suggesting that the boundary needs to be realigned. This is shown in **Figure 1** below.

Figure 1: The area of potential significance – Wye Creek SNA A – C24A



Figure 1: SNA C24A Boundary as Notified

Neil McDonald - 409, New Zealand Tungsten Mining Limited - 519, D & M Columb - 624, Reavers NZ Limited – 710, and Remarkables Park Limited - 807

5.4 The submitters listed above have sought changes to Landscape Categorisations.

5.5 I understand the vegetation clearing rules as set out in Chapter 33 of the PDP will apply to a range of landscape categories within the Rural zone. The change in the landscape planning classifications as proposed under submissions 409, 519, 624, 710 and 807 will not change the application of the vegetation clearing rules. I therefore neither oppose or support these submissions.

Mount Christina Limited - 764

5.6 Mount Christina Limited has sought that part of the land located adjacent to Glenorchy – Paradise Road, approximately 440 metres south of Lovers Leap Road be rezoned from notified Rural Zone to Rural Residential Zone.

5.7 I instructed an environmental scientist who works for Davis Consulting Group to complete a visit of the site on 20 April 2017 and describe the vegetation on the site. I can confirm that vegetation cover of the area proposed for rural residential activity is developed pasture grass and a line of introduced conifers are present.

5.8 The site has a lack of indigenous vegetation and therefore ecological values. From an ecological perspective, I do not oppose the Mount Christina submission.

Garry Strange – 168, and Nick Clark - 298

5.9 Gary Strange and Nick Clarke have sought that land located in Wilsons Bay and adjacent to Closeburn Road and Glenorchy Queenstown Road be rezoned from notified Rural Lifestyle with a Building Restriction Area, to Rural Residential Zone.

5.10 The lots that are the subject of submissions 168 and 298 are largely covered in mature exotic conifer trees. There is some bracken fern on the lower slopes of the lots, but it appears likely that without intervention all of the sections subject to the submission will be covered in exotic pine trees over time.

5.11 From an ecological perspective, I do not oppose the submission. I note that development of the lots may be beneficial to the control of wilding exotic conifers in the area, if increased density resulted in the removal of conifers from these lots.

Glentui Heights Ltd – 694

5.12 Glentui Heights have sought that land located within the Glentui Heights subdivision situated in Bobs Cove be rezoned from notified Rural Residential (Bobs Cove Sub Zone) to Rural Residential Zone.

5.13 I undertook a visit of the subject site on 19 April 2017. The Glentui Heights land consists of open areas dominated by introduced pasture grasses, landscape plantings and regenerating indigenous vegetation, dominated by manuka but also including *Coprosma*

propinqua, bracken fern and mountain beech. **Figure 2** shows a photo of the manuka dominated vegetation along the southern boundary of the subdivision. The manuka woodland is a good example of mid successional vegetation and is representative of this environment and will provide habitat for a range of indigenous birds, lizards and invertebrates. I note however that the vegetation is not rare, nor is it likely the vegetation contains uncommon or threatened plants and fauna. I therefore do not consider the vegetation would be considered significant.

- 5.14** The manuka woodland has ecological value and the notified Rural Residential Bobs Cove Sub Zone will provide a greater level of protection to the remaining indigenous values, as it specifically requires that at least 50% of the undomesticated area within the zone shall be retained, established, and maintained **[CB16]**. I consider this provides clear direction for the protection of the remaining ecological values, and I therefore oppose the Glentui Heights submission as this protection would not be provided in the Rural Residential Zone sought by the submitter.



Figure 2: Manuka Woodland near the southern boundary of the Glentui Heights subdivision.

Bobs Cove Developments Limited - 712

- 5.15** Bobs Cove Developments Limited have sought that land located within the Department of Conservation Estate adjacent to the southern boundary of the Glentui Heights subdivision in Bobs Cove is rezoned from notified Rural to Rural Residential Zone. It is understood the parcel of land is subject to a land swap.
- 5.16** I viewed the boundary of the site from the Glentui subdivision on 19 April 2017. The vegetation covering the proposed land parcel is in a mid-successional state and is dominated by manuka but containing a range of other indigenous plants including Coprosma species and mountain beech. The vegetation is also contiguous with indigenous vegetation to the east, south and west of the site. The vegetation is representative of a mid-successional community but I do not consider this vegetation to be rare in western parts of the District.
- 5.17** I oppose the Bobs Cove Developments Limited's submission as the proposed Rural Residential Zone assumes a level of development will occur to support the domestication of the site, including the building of a house and access road. In my view this activity would remove a significant area of the indigenous vegetation on the site. It would also be difficult for rural residential development of the site to meet Objective 22.2.7 (Bobs Cove Rural Residential Zone) – *'To maintain and enhance the ecological and amenity values of the Bobs Cove Residential Zone'*.

M & C Wilson - 848

- 5.18** M & C Wilson have sought that land located on Glen Nevis Road, Kingston be rezoned from notified Rural to Large Lot Residential.
- 5.19** I viewed this site from the Glen Nevis Road on 25 April 2017. The land parcel subject to this submission consists of intensively developed pasture but also includes an area of rock tors/outcrop and shrubland in the northwest portion of the site that may provide good lizard habitat. The area of ecological interest is shown in **Figure 3**. More detailed ecological investigations are required of these rock

tors/outcrops to determine if this area is suitable for residential development. I therefore oppose the submission to rezone the land for large lot residential activity.



Figure 3: Rock outcrops/tors within Proposed Large Lot Residential Zone, Glen Nevis Road, Kingston.

Kingston Lifestyle Family Trust - 689

5.20 The Kingston Lifestyle Family Trust has sought that land situated on the Kingston Garston Highway and adjacent to the southern boundary of Kingston be rezoned from notified Rural to either Kingston Township, Low Density Residential or Kingston Village zone.

5.21 I viewed this site from the Kingston Garston Highway on 25 April 2017. **Figure 4** provides a photograph of the site showing the vegetation is dominated in pasture grass with some willow trees. A creek with a catchment area extending up into the Hector Mountains to the east of the site runs along the western boundary of the property and discharges into Lake Wakatipu. There will be some freshwater ecology values associated with the creek that would need to be considered if low density zoning was considered appropriate for the site.

- 5.22** The terrestrial ecological values of the property are minimal given the lack of indigenous vegetation. I therefore do not oppose the proposed zoning of the site, providing any values in the creek are considered through any future development activities.



Figure 4: View looking north of Kingston Lifestyle Family Trust land adjacent to Kingston township.

Tim Taylor - 826

- 5.23** Tim Taylor has sought that land situated on the Kingston Garston Highway and to the east of the Kingston Township be rezoned from Rural to a zoning that provides for residential and commercial activity.
- 5.24** I viewed this site from the Kingston Garston Highway on 25 April 2017. I can confirm that land subject to the submission has been developed for pastoral activities and there is minimal (if any) indigenous vegetation present. From an ecological perspective, I do not oppose the proposed rezoning of this site.

Noel Gutzewitz & J Boyd - 328

5.25 Noel Gutzewitz & J Boyd have sought that land situated on Boyd Road, Queenstown on the true right bank of the Kawarau River be rezoned from notified Rural to Rural Lifestyle Zone.

5.26 I have used aerial photography to assess this site and consider the site has largely been developed and indigenous ecological communities have been removed from the site. I therefore do not oppose the proposed rezoning of this site.

Barbara Kipke - 431

5.27 Barbara Kipke has sought to rezone land situated between Kingston Road and Vista Terrace at Wye Creek from notified Rural Zone to Rural Lifestyle Zone.

5.28 I viewed this site from the Vista Terrace on 25 April 2017 and I also spoke to Mr Neill Simpson, a local botanist and conservation ecologist who has undertaken ecological restoration work on the property since 1999.

5.29 The vegetation on the site consists of open areas dominated by pasture grasses, an area of natural regeneration to the south west of the property dominated by bracken fern, pittosporum and coprosma and areas of ecological restoration planting. I understand Mr Simpson has planted approximately 16,000 plants on the site since 1999 and the site was formerly a lucerne paddock. The restoration plantings and natural regeneration occurring on the site provide good habitat for insects, lizards and birds.

5.30 Some of the vegetation on the site has similarities to the identified Significant Indigenous Vegetation and Habitat (SNA C24A) located immediately to the south of the site. However, I consider the SNA is in a more advanced stage of succession and contains a closed canopy cover of shrubland plants and provides better habitat for birds, lizards and invertebrates.

- 5.31** While there are ecological values on the site associated with both the restoration planting and natural regeneration, there are large areas of the site that have been maintained in exotic grass cover where development activities would have minimal implications on the ecological values. Given the extensive restoration efforts undertaken by the submitter I consider the proposed rural lifestyle development can be achieved without affecting the ecological values of the site.

The Station at Waitiri - 331

- 5.32** The Station at Waitiri has sought to rezone the notified Rural Zone and Gibbston Character Zone to Rural Lifestyle Zone.
- 5.33** I have assessed the ecology of the site from aerial photography and from the Gibbston Highway. I consider most of the subject land has been developed and is covered in introduced pastures. The only remaining indigenous flora is on the margins of the site with matagouri, *Coprosma propinqua* and *Melicytus alpinus* (porcupine shrub) scattered on the southern slopes of the site.
- 5.34** From an ecological perspective, I do not oppose the proposed zone, given the lack of indigenous vegetation cover across the site.

Gibbston Valley Station Ltd - 827

- 5.35** Gibbston Valley Station Ltd has sought that the site is rezoned from notified Rural Zone and Gibbston Character Zone to an alternative zone that that allows for a range of uses, including residential, viticultural, commercial, visitor accommodation and commercial recreation.
- 5.36** I am very familiar with the site, having completed an ecological review on behalf of QLDC for resource consent application RM080864.
- 5.37** The ecological values of the subject area have been assessed through the resource consent application RM080864 and the identification of SNA F40D. The values are associated with shrubland communities and rocky outcrops providing habitat for

lizards, and shrublands that include mature kowhai trees that have a severely restricted population in the District. The consented development has taken these ecological values into account and worked within these constraints.

5.38 Development activities within the proposed rezoning of the site would be subject to the indigenous vegetation provisions in Chapter 33 of PDP. However, in my experience, if development proposals are consistent with the zoning, vegetation and habitat disturbance will be more permissive. For example, clearance of vegetation (including threatened plants) on the Pisa Range has been progressively consented by council. The granting of these consents is in part due to land being subject to the Ski Area Sub zone.

5.39 Given there are important ecological values within the Gibbston Valley Station site it is my view that a better understanding of proposed development activities is provided before rezoning of the land. This would provide a better understanding of potential ecological effects. In summary without further detailed information regarding proposed development activities, I oppose the rezoning sought.

Karen & Murray Scott, Loch Linnhe Station - 447

5.40 Karen & Murray Scott have sought the rezoning of two areas of Loch Linnhe Station from notified Rural Zone to (operative) Rural Visitor Zone, with 'Farm Base Areas' (which is a concept that I understand is being considered in the Mackenzie District).

5.41 I am familiar with these sites, having completed an SNA survey across the Station in 2010 and have more recently completed visits to the sites on 26 April 2017.

5.42 **Figure 5** and **Figure 6** present photographs of the site showing the nature of the vegetation. The northern area (or Wye Creek Site) proposed for rezoning is dominated by exotic conifers, and by exotic grassland dominated by introduced grasses and herbaceous plants (including browntop, sweet vernal, cockfoots, *Poa* spp, haresfoot

trefoil and yarrow). Given the lack of indigenous ecological communities on this site, I do not oppose the proposed rezoning from an ecological perspective.



Figure 5: Loche Linnhe – photo taken from middle of site looking south.



Figure 6: Loche Linnhe – photo taken from middle of site looking north across towards Queenstown.

- 5.43** The vegetation of the southern area or Homestead Block is dominated in developed exotic pasture grass and introduced mature trees (willow, poplar, exotic conifers). An area of bracken fern is present in a shallow gully that runs through the site. This area is likely to contain regenerating indigenous plants such as *Coprosma* and *Pittosporum*. The remaining indigenous cover is relatively small in size and given its location within the gully it is unlikely to be disturbed.
- 5.44** Based on the lack of indigenous cover across the site, I do not oppose the Farm Base Activity overlay for the site.
- 5.45** I note that the submission seeks that the Farm Base Activity areas are included in the PDP, on large rural properties over 1000ha. I understand from the evidence of Mr Buxton, that a Farm Base Activity overlay would allow for the development of homesteads, staff accommodation and farm buildings as permitted or controlled activities. Without specific information regarding the location of the proposed Farm Base Activity Areas it is not possible to consider the potential ecological implications of this zone. I am therefore unable to provide evidence on this submission.

Lake Wakatipu Station Limited & Review Seventeen Limited - 478

- 5.46** Lake Wakatipu Station Limited & Review Seventeen Limited have sought the rezoning of land at Halfway Bay from notified Rural Zone to Rural Visitor Zone.
- 5.47** Based on aerial imagery and an overview of the site via helicopter, the area proposed for rezoning is dominated by exotic pasture grassland, and areas of exotic trees species. Immediately to the southwest of the Rural Visitor Zone boundary as sought by the submitter are areas of native beech trees and immediately to the northwest are likely areas of native grey shrubland. However, these lie outside the current proposed plan change boundary. Therefore, I do not oppose the Rural Visitor Zone from an ecological perspective.

Te Anau Developments Limited - 607

- 5.48** Te Anau Developments Limited seek to rezone land located at Walter Peak and described as Pt. Sect 19 BLK III MID WAKATIPU SD, Section 1 SO 10828, and the marginal strip adjoining this land and adjoining the land owned by Te Anau Developments Ltd and notified as Rural, to a Rural Visitor Walter Peak Zone.
- 5.49** Based on aerial imagery and an overview of the site via helicopter, the area proposed for rezoning along the lake margin is dominated by native bracken fern, and includes cabbage trees and eucalypt trees. The proposed area for rezoning immediately behind the homestead building is dominated by exotic trees, and then an area dominated by native bracken fern. There is some ecological value remaining within the areas covered in bracken fern, as this native plant provides a good nursery environment for continued development of the indigenous ecological community, namely a broadleaf indigenous hardwood community.
- 5.50** I oppose the rezone request given the ecological values present in the marginal strip (native bracken fern, *Coprosma* and other regenerating indigenous hardwoods) and lack of detail regarding the use of this land. I would reconsider this view if the marginal strip land was removed from the proposal.

Amrta Land Ltd - 677

- 5.51** Amrta Land Ltd have sought land located on Woodbine Station on Kinloch Road be rezoned from notified Rural to Rural Visitor Zone.
- 5.52** I instructed an environmental scientist who works for Davis Consulting Group to complete a visit of Woodbine Station on the 20 April 2017 to describe the vegetation on the site.
- 5.53** The Amrta submission covers land on the valley flats to the north of Lake Wakatipu on the true right of the Dart River and the lower hillslopes of the Humboldt Mountains overlooking Lake Wakatipu. The hillslopes are regenerating, and are dominated by the early

succession bracken fern community that will be providing a good nursery crop for the progressive development of vegetation should the station chose not to undertake clearing activities. The valley flats immediately to the north of Lake Wakatipu have been developed and are dominated by introduced pasture communities but are also likely to contain some areas of wetland.

- 5.54** The submission provides little information regarding the scope of tourism activities on the property. It is therefore not possible to consider the effects the zone may have on the ecology of the area. Without a clearer understanding of the activities that may occur under the proposed zone, I oppose the submission.

Queenstown Park Limited - 806

- 5.55** Queenstown Park Limited have sought that Queenstown Station be rezoned from notified Rural to Queenstown Park Special Zone.
- 5.56** I viewed the site with Queenstown Park representatives and Council staff on 15 March 2017.

Development pods

- 5.57** The site visit included a drive through the site to view the proposed development pods across the site. The proposed development 'pods' are within areas where indigenous vegetation has been removed. **Figure 7** and **Figure 8** show photographs of these areas on the lower slopes of Queenstown Station that are proposed for rural residential activities and all are on areas of developed pasture. I do not oppose development in these areas from an ecological perspective.



Figure 7: Queenstown Park Station Rural Residential Pod.



Figure 8: Queenstown Park Station Rural Residential Pod.

Proposed Gondola Corridor

5.58 The proposed Gondola Corridor to the Remarkables ski field lies outside the neighbouring Rastus Burn SNA (I refer to a diagram

provided by the submitter and I understand attached to the s42A evidence at Appendix 3). Within Queenstown Station, the gondola footprint would traverse through areas that have had a long history of extensive pastoral activity and dominated by semi native grassland systems and mixed exotic shrubland containing briar, hawthorn, matagouri and *Coprosma propinqua*. These vegetation communities are common throughout the District and into Central Otago District. I consider the development footprint of a gondola within the proposed corridor will have minimal effect on the ecology of the Station. I therefore do not oppose the provision of a Gondola Corridor within the proposed Special Zone.

Station 'balance area'

- 5.59** The 'balance area' of Queenstown Station proposed for the Special Zone contains a wide range of ecological values including shrubland communities, the distinctive and locally rare mature kowhai scattered across the lower to mid slopes of the Station, and habitat for a range of lizard, birds and endemic invertebrates, particularly those associated with tree daisys (*Olearia* spp) that are present across the Station. The lack of detail proposed for the 'balance area' of the Special Zone provides scope for a wide range of activities and will provide a more permitted planning context than the current notified Rural General Zoning. Given the lack of detail regarding activities in the balance area, I do not support the proposed Special Zone over this balance area.
- 5.60** The Queenstown Park Limited submission has indicated that if the rezoning proposal is not accepted, they would request that the four SNAs (F32A 1, 2, 3 and F32B) identified on the station are removed. I oppose the removal of the SNAs and rely on my evidence submitted for the Rural Hearing Stream 02, dated 6 April 2016 in support of the significant ecological values within the four SNAs. I understand that requests for SNAs to be removed in their entirety from the planning maps (rather than amended) were to be addressed through evidence at the earlier Rural hearing stream.

Middleton Family Trust - 393

- 5.61 Middleton Family Trust have sought that 114 hectares of land on top of Queenstown Hill be rezoned from notified Rural to Airport Mixed Use Zone.
- 5.62 I viewed the site with Nick Geddes on 27 March 2017. The site is situated between 800 and 900 masl. Based on the Potential Natural Vegetation² and my understanding of vegetation in the District at this altitude, the pre-settlement vegetation of the site would have consisted of shrubland and tall tussock grassland communities in addition to wetland communities. The Potential Natural Vegetation is based on statistical modelling and Land Environments of New Zealand (**LENZ**) to reconstruct vegetation patterns across New Zealand. This work is provided by Landcare Research on the 'Our Environment' website.³
- 5.63 My observations of the vegetation during the site visit found the site to be dominated by a short tussock grassland/herbfield consisting of blue tussock (*Poa colensoi*) and hard tussock (*Festuca novae-zealandiae*) and a range of indigenous and introduced sub-shrubs and herbs including *Pimelea aridula*, *Coprosma petriei*, *Leucopogon fraseri*, *Luzula spp*, occasional manuka (*Leptospermum scoparium*), *Ozothamnus spp* and *Raoulia subsericea*. The tall tussock originally present on the site has entirely been removed (although scattered individuals are present outside of the proposed zone) indicating that the site has had a long history of pastoral activity, including regular rotations of burning and grazing activity.
- 5.64 The vegetation present on the site is not representative of the original vegetation cover and these species and vegetation community are not rare in the District. Nevertheless, the site contains an extensive indigenous community that has adapted to the historical pastoral activity. The site also contains extensive wetland communities (see **Figure 9**) that are likely to contain listed threatened species including the 'at risk – naturally uncommon' *Carex berggrenii* and *Geranium microphyllum*.

2 Using a tool provided by Landcare Research at <http://ourenvironment.scinfo.org.nz>.
3 <http://ourenvironment.scinfo.org.nz/home>.

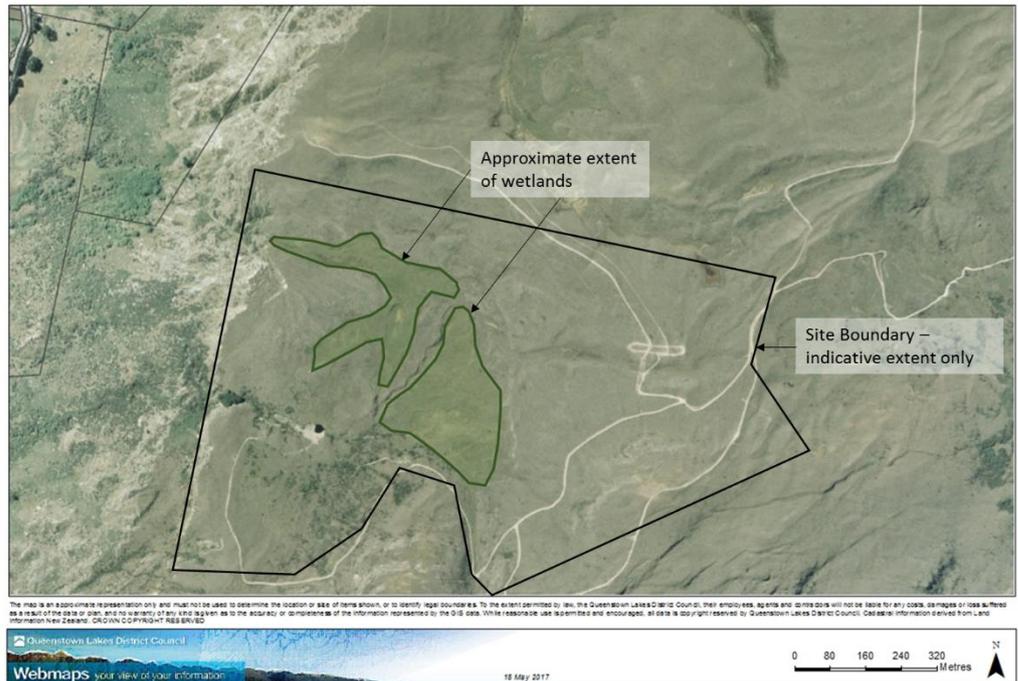


Figure 9: Extent of Proposed Airport Mixed Use Zone and Areas of Wetlands

5.65 Based on the extensive indigenous cover of the site and the large areas of wetlands present I oppose the rezoning proposal. From an ecological perspective it is my view that a greater level of ecological detail and understanding of the development footprint is required before a more permissive planning context can be considered for the proposed airport activities.

6. REQUESTS FOR REZONINGS – URBAN BUSINESS (1A)

QUEENSTOWN TOWN CENTRE – ENTERTAINMENT PRECINCT AND OTHER TOWN CENTRE SUBMISSIONS

6.1 I have considered a number of submissions within the Entertainment Precinct and other urban/built environments of the Queenstown Town Centre.⁴ These submissions are all associated with proposed activities within the Queenstown Town Centre built environment and have no ecological matters to be considered. I do not oppose any of these rezonings from an ecological perspective.

4 Submissions 247; 250; 291; 357; 394; 398; 544; 549; 587; 589; 596; 599; 714; 724; 774; 804; 832; 835

1 HANSEN ROAD

QAC– 433; NZTA– 719 and Spence Farms – 698

6.2 No ecological comment is required on these submissions.

MCBRIDE ST

Barbara Williams – 141; Brett Giddens – 82 and C & S Hansen - 840

6.3 Barbara Williams Brett Giddens and C & S Hansen seek rezoning of land in McBride Street, Frankton. The submissions are all associated with land in an established part of Frankton where there are no remaining indigenous vegetation communities. Given the lack of ecological values within the township environment, I do not oppose the submissions.

FRANKTON MARINA

ds ee properties ltd – 16; Kenneth Muir – 125 and Z Energy Limited – 312

6.4 These submitters seek the rezoning of properties near the Frankton Marina. All land is currently in commercial use and there are no indigenous vegetation values present. I therefore do not oppose the proposed rezonings from an ecological perspective.

GLENDA DRIVE

Schist Holdings Limited and Bnzl Properties Limited – 488; Fletcher Distribution Ltd and Mico New Zealand Ltd – 344; Reavers NZ Limited – 720 and Aviemore Corporation Ltd - 418

6.5 These submitters seek the rezoning or partial rezoning of their commercial properties on Glenda Drive.

6.6 Based on aerial photograph interpretation and my local knowledge of these properties, I confirm there are no remaining indigenous vegetation or ecological values associated with these properties. I

therefore do not oppose the proposed rezonings from an ecological perspective.

Skyline Enterprises Limited - 574

6.7 Skyline Enterprises Limited seeks extensions to the Gondola Corridor, Bobs Peak Commercial Tourism & Recreation Sub-Zone and Bottom Terminal.

6.8 I have reviewed the proposed extensions in aerial photographs that show that most of the extension areas are within exotic douglas fir dominated forest or in a built environment such as the bottom terminal. There is an area of tussock grassland present in the extension area below the top terminal building, although this already has a path through it for access to the AJ Hackett Bungy platform.

6.9 From an ecological perspective I do not oppose the extension areas proposed in the Skyline Enterprises submission.

WATERFRONT SUB-ZONE

Queenstown Wharves GP Limited – 766 and Remarkables Park Limited – 807

6.10 Queenstown Wharves GP Limited and Remarkables Park Limited seek clarity around the extent of the Town Centre waterfront zone. No ecological comment is required regarding these submissions.

Coronet Property Investments Limited – 321; Skyline Enterprises Limited 556 and Trojan Holdings Limited - 634

6.11 Coronet Property Investments Limited, Skyline Enterprises Limited 556 and Trojan Holdings Limited submissions are associated with commercial/industrial properties on Gorge Road, Queenstown. The Gorge Road environment is built up and has no remaining indigenous vegetation or habitats remaining. Therefore, from an ecological perspective I do not oppose the submissions or any proposed rezoning requests.

Watertight Investments Ltd – 672

6.12 Watertight Investments Ltd submission is associated with land located at 50, 52 and 54 Camp Street. All properties are in a built-up environment of Queenstown and have no remaining indigenous vegetation. From an ecological perspective, I do not oppose the submission or any rezoning requests.

7. REQUESTS FOR REZONINGS – QUEENSTOWN URBAN – FRANKTON AND SOUTH (1B)

Peter and Margaret Arnott – 399

7.1 Peter and Margaret Arnott oppose the rezoning of part of their land located along Frankton-Ladies Mile Highway, near Grant road (Lot 1 Deposited Plan 19932 and Section 129 Block I Shotover Survey District) as Rural and seek that this land is rezoned Local Shopping Centre and/or Business Zone. The submitter further seeks that the ONL be moved in a northerly direction to the northern boundary of the submitters land.

7.2 Aerial photographs of the site show that the majority of the site contains pasture grass and exotic species.

7.3 Given the lack of indigenous vegetation on the site the indigenous ecological values will be limited. I therefore do not oppose the potential rezoning of the site.

The Jandel Trust – 717

7.4 The Jandel Trust seeks that approximately 42 hectares of land on Abbotswood Lane, Trench Hill Road and Frankton Ladies Mile Highway be rezoned from notified Rural to Business Mixed Use Zone.

7.5 The site consists of gentle sloping land adjacent to Frankton Ladies Mile Highway and moderately east facing slopes for Ferry Hill. The whole area has been the subject of pastoral activity with the lower

slopes intensively developed for pasture grass and no indigenous vegetation present (see Error! Reference source not found.). The higher elevation area of the site has been extensively grazed and has a vegetation cover dominated by introduced grasses, but also contains woody weeds such as briar, mature poplars and scattered matagouri, and individual and small clumps of grey shrubland dominated by matagouri (see Error! Reference source not found.).

7.6 The remaining pockets of indigenous vegetation are very small and are not good representative communities of grey shrubland in the District. I note that the lower slopes lie within a chronically threatened environment where the indigenous cover remaining is less than 20% of the original cover. The rarity of indigenous cover within lowland environments is an important driver in determining the significance of indigenous vegetation. However, I am of the view that the small size of the grey shrubland present limits the habitat value of the stands.

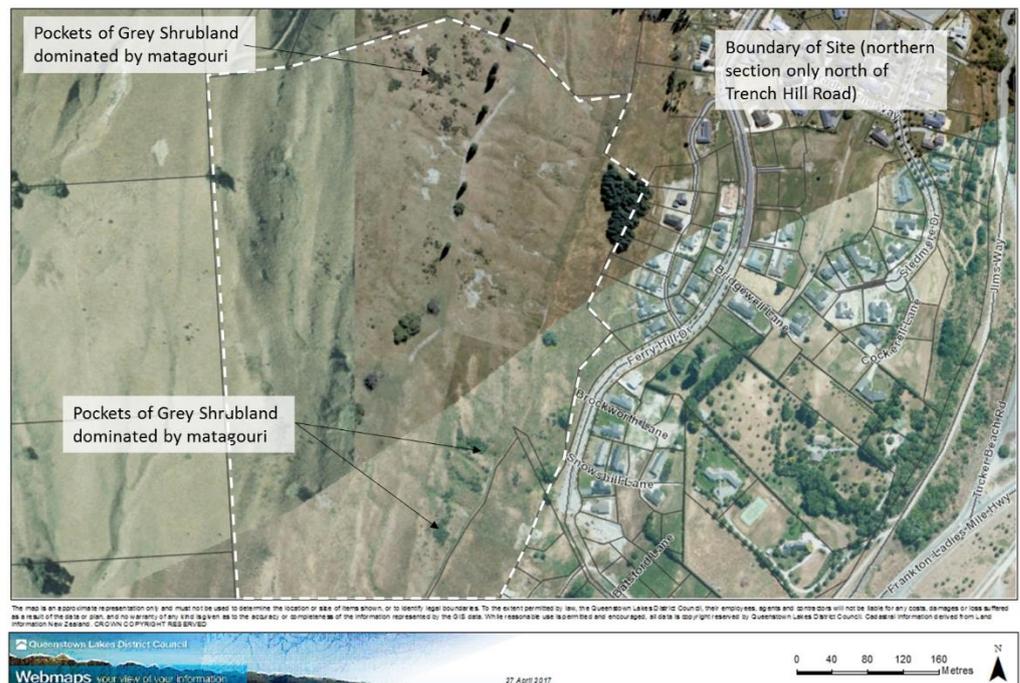


Figure 10: Jandel Property showing location of pockets of Grey Shrubland (base aerial image taken from QLDC Webmaps).

7.7 In summary, I do not consider the remaining indigenous vegetation on the site is a constraint to more intensive development of the land, and I do not oppose the proposed rezoning of the property.

Hansen Family Partnership – 751

- 7.8** The Hansen Family Partnership support the area of Medium Density Residential zone proposed alongside State Highway 6, however the submitter seeks to rezone the area of Rural and Medium Density Residential zones located over the land on the northern side of State Highway 6 located between Hansen Road and the Eastern Access Road, and within the Queenstown Urban Growth Boundary, to industrial. Alternatively, the submitter seeks to rezone this land as any mix of Low, Medium or High Density Residential, Industrial, Business Mixed Use or Local Shopping Centre Zones.
- 7.9** I have reviewed aerial photographs and the only vegetation remaining on site consists of pasture grasses or woody weeds such as broom and sycamore.
- 7.10** Based on the lack of indigenous vegetation on the site I do not oppose the rezoning proposal from an ecological perspective.

FII Holdings Limited – 847

- 7.11** FII Holdings Limited seeks that 4 hectares of land located at 145 Frankton-Ladies Mile Highway is rezoned from notified Medium Density Residential to Business Mixed Use zone or Industrial zone.
- 7.12** I have assessed aerial photographs of the site that show that half the area is currently utilised as gravel or hardstand area and the remaining site is residential with areas of pasture grass.
- 7.13** Based on the lack of indigenous vegetation on the site I do not oppose the rezoning proposal from an ecological perspective.

Villa delLago – 380; NZ Transport Agency – 719; The Jandel Trust – 717; FII Holdings Ltd – 847; Peter & Margaret Arnott – 399; Universal Development Limited – 43; Stephen Spence – 8; Sean and Jane McLeod – 391; Otago Foundation Trust Board – 408

7.14 These submitters seek amendments to the provisions of the Medium Density Residential .

7.15 Notified Medium Density Residential land in the PDP is located on land that is in urban environments or urban fringe that have had a long history of modification. I have reviewed the location of the notified Medium Density Residential land and confirm that there is no indigenous vegetation remaining in these areas.

7.16 Given the lack of indigenous vegetation or habitats on land zoned as Medium Density Residential under the PDP I do not oppose these submissions.

Hansen Family Partnership - 751

7.17 Hansen Family Partnership seek to amend the location of the Ferry Hill ONL line. The submitter proposes a new ONL boundary further north and that is proposed to follow legible features in the landscape including the Arrow Irrigation race and hill forms. The location of the proposed ONL line is shown on the plan contained within Appendix 1 of this submission.

7.18 Aerial photographs show the site is predominately covered by woody weed species and exotic pasture grasses.

7.19 Given the lack of indigenous vegetation within the area the indigenous ecological values will be limited. From an ecological perspective, I do not oppose the adjustment of the ONL boundary, however I cannot comment on the amendment of the ONL boundary from a landscape perspective.

LAKE JOHNSON

Middleton Family Trust - 338

7.20 The Middleton Family Trust seeks that approximately 77 hectares of land at the western extent of Tucker Beach Road be rezoned from notified Rural to Low Density Residential Zone. The submission also seeks that a further 19 hectares of land be rezoned from Rural to Rural Residential Zone.

7.21 I viewed the area with Mr Geddes, a planning representative of The Middleton Family Trust, on 22 March 2017. The visit involved a drive through the property to view the areas associated with the submission and to assess the vegetation present across the site. **Figure 9** below is a plan of the site that shows the areas of proposed Rural Residential and Low Density Residential Zone land. I have also provided three photographs below, to show the vegetation that I encountered during the site visit. Numbers 1-3 on **Figure 9** indicate where these photographs were taken.

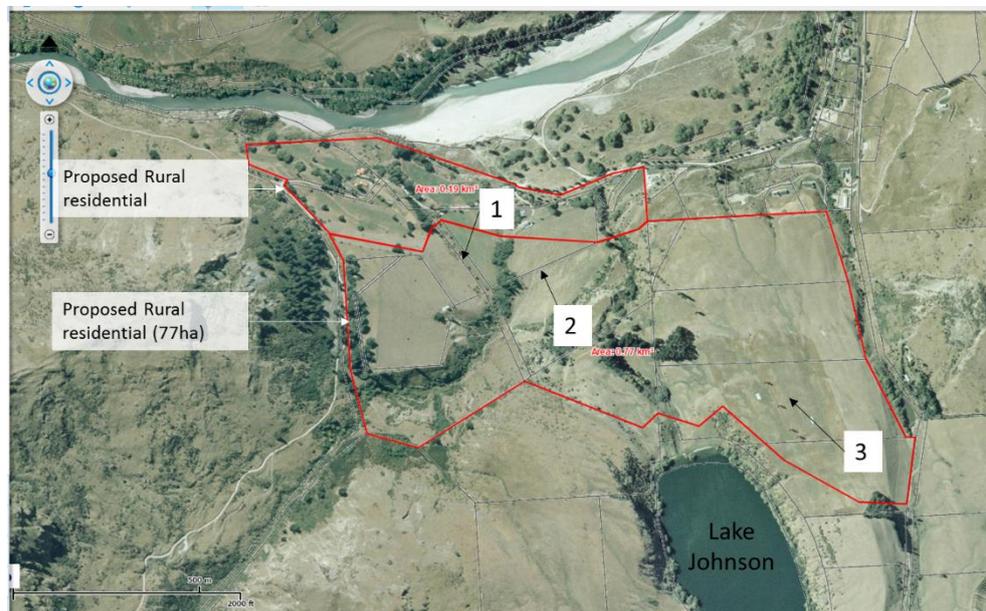


Figure 9: Plan showing the boundary of the site and approximate location and direction of photographs provided herein.

7.22 The site has had a long history of pastoral activity and most of the site has been intensively developed. **Photographs 1, 2 and 3** are representative of the proposed Low Density Residential areas and

they all clearly show indigenous vegetation has almost been entirely removed from the site. The only remaining areas of indigenous vegetation are within the incised gully systems of the site that are in areas shown on the plans as 'Proposed Escarpment Protection Areas' or within incised gullies.



Photograph 1: Photograph of lower terrace and terrace riser taken from site 1 (see **Figure 9** for location and direction of photograph)



Photograph 2: Photograph of lower terrace and terrace riser taken from site 2 (see **Figure 9** for location and direction of photograph)



Photograph 3: Photograph of elevated ground near Lake Johnson taken from site 3 (see **Figure 91** for location and direction of photograph)

7.23 Given the lack of indigenous vegetation communities within the areas proposed to be rezoned, I do not oppose the submission from an ecological perspective.

James Canning Muspratt - 396

- 7.24** James Muspratt seeks that approximately 1.5 hectares of land on Hansen Road, near Tuckers Beach be rezoned from notified Ferry Hill Rural Residential Subzone and Rural Zone to Rural Residential Zone.
- 7.25** I viewed the land that is the subject of the rezoning proposal on 26 April 2017 and can confirm that the vegetation is currently grazed and is covered in introduced exotic pasture grass.
- 7.26** Based on the lack of indigenous vegetation communities on the site, I do not oppose the proposed rezoning from an ecological perspective.

Keith Hindle & Dayle Wright – 476

- 7.27** Keith Hindle & Dayle Wright seek that approximately 6 hectares of land on Tuckers Beach be rezoned from notified Rural and Rural Lifestyle Zone to Rural Residential Zone.
- 7.28** I viewed the land associated with the proposal on 26 April 2017 and have also reviewed aerial photographs of the site. All of the land has either been domesticated for residential living or has been developed as a vineyard.
- 7.29** Based on the lack of indigenous vegetation communities on the site, I do not oppose the proposed rezoning from an ecological perspective.

AIRPORT

Z Energy Ltd, BP Oil NZ Ltd and Mobil Oil NZ Ltd – 768

- 7.30** Z Energy Ltd, BP Oil NZ Ltd and Mobil Oil NZ Ltd supports the extension of the boundary of the Queenstown Airport Mixed Use zone (i.e. the notified zone extent) as shown on Map 31a and seek to retain without further modification.

- 7.31** Aerial photographs show that there is no indigenous vegetation present.
- 7.32** Given the lack of indigenous vegetation on the site, the indigenous ecological values will be limited. I therefore do not oppose the potential rezoning of this area.

FRANKTON NOTIFIED MEDIUM DENSITY ZONING

Russel Marsh – 128

- 7.33** Russel Marsh seeks to reinstate the operative Medium Density Residential zoning for Frankton as opposed to the notified Low Density Residential zone. Alternatively, the submitter seeks to amend the plan to include Frankton district streets into the Medium Density Residential zone that are currently outside the Air Noise Boundary.
- 7.34** Aerial photographs show a mixture of development and vacant land. These sites contain a mixture of exotic species and native plantings.
- 7.35** Given the lack of indigenous vegetation in these areas the indigenous ecological values will be limited. I therefore do not oppose the potential rezoning of the site.

Ian & Dorothy Williamson – 140

- 7.36** Ian and Dorothy Williamson oppose the Medium Density Residential zoning for Frankton, and seek that the Low Density Residential zone be retained.
- 7.37** The notified zoning of this area is Low Density Residential, and therefore no ecological comment is required.

MCBRIDE STREET

Joanna Pheland & Brent Herdson – 458; Scott Freeman & Bravo Trustee Company Ltd – 555; Malcolm McKellar & Anna Stevenson – 36; Hayden Tapper – 24; KE Hamlin & HM Hamlin & RD Liddell – 43; Keith Hubber Family Trust No 2 – 35

7.38 No ecological comment is required for these submissions.

STEWART STREET

JD Familton & Sons Trust – 586 and HR & DA Familton – 775

7.39 JD Familton & Sons Trust and HR & DA Familton seek to retain Medium Density Residential zoning over 17 Stewart Street, Frankton. As noted in the Group 1B section 42A report, this area was considered for rezoning to Medium Density Residential during the consultation phase of the PDP, but this was not pursued and the notified zoning is Low Density Residential.

7.40 The notified zoning of this area is Low Density Residential, and therefore no ecological comment is required.

BOYES CRES

Queenstown Lakes District Council – 790

7.41 Queenstown Lakes District Council seek to rezone approximately 0.085 ha of reserve land that has a front to Boyes Road from Rural to Low Density Residential.

7.42 Aerial photographs show the site contains a mixture of exotic species.

7.43 Given the lack of indigenous vegetation on the site, the indigenous ecological values will be limited. I therefore do not oppose the potential rezoning of the site.

QUEENSTOWN HILL ABOVE MARINA

Bruce Grant – 318 and 434

- 7.44** Bruce Grant seeks to rezone three separate titles on Marina Drive, Frankton (Lot 6 DP 345807, Lot 7 DP 345807 and Lot 10 DP 345807) from Rural to the Low Density Residential zone, and include the titles within the Urban Growth Area.
- 7.45** Aerial photographs of the site show the vegetation present is woody weeds including broom and lupin.
- 7.46** Given the lack of indigenous vegetation on the site, the indigenous ecological values will be limited. I therefore do not oppose the potential rezoning of these site.

KELVIN HEIGHTS

Winton Partners Funds Management No.2 Ltd – 533

- 7.47** Winton Partners Funds Management No. 2 Limited seeks to rezone approximately 6ha of land between Kingston Road and Peninsula Road from notified Rural to either High Density Residential, Medium Density Residential, Low Density Residential or Business Mixed Use.
- 7.48** Aerial photographs of the site show the vegetation is infested with woody weeds including sycamore, rowan, hawthorn and briar. I have also walked along the perimeter of the site and confirm indigenous vegetation values have been removed.
- 7.49** Given the lack of indigenous vegetation on the site, the indigenous ecological values will be limited. I therefore do not oppose the potential rezoning of the site.

Land Information New Zealand – 661

- 7.50** Land Information New Zealand seeks to rezone approximately 6ha of land between Kingston Road and Peninsula Road from notified Rural

to Low Density Residential. This is the same parcel of land discussed in paragraph 7.47 above and I adopt my evidence set out in paragraphs 7.47 to 7.49.

Kerr Ritchie Architects – 48

7.51 Kerr Ritchie Architects seek that 1.06 hectares of land located at 48 and 50 Peninsula Road be rezoned from notified Rural to Low Density Residential Zone.

7.52 Based on a review of aerial photographs, 48 Peninsula Road has been developed for residential purposes consisting of a house, driveway and landscaped gardens while the adjacent land parcel is covered in introduced grasses.

7.53 Given the lack of natural indigenous vegetation cover on the site, I do not oppose the proposal to rezone the site.

Bonisch Consultants – 425

7.54 Bonisch Consultants seek that 2.21 hectares of land on Peninsula Road and 2.07 ha of land on the southern extent of Balmoral Drive in Kelvin Heights be rezoned from notified Low Density Residential Zone to Medium Density Residential Zone. The submission also seeks 0.83 ha on Peninsula Road be rezoned from notified Low Density Residential to Local Shopping Precinct. Furthermore, the submission seeks 18.1 hectares of land on Deer Park Heights be rezoned from notified Rural Zone to Low Density Residential Zone.

7.55 I viewed the land subject to the rezone proposals on 23 March 2017. The land associated with the Medium Density rezone proposal and the Local Shopping Precinct is covered in exotic grasses and lupins. Given the lack of indigenous vegetation on these sites, I do not oppose the rezoning.

7.56 The Low Density Residential rezoning proposal is in two areas adjoining existing low density residential zoned land. The 6.1 ha area

to the north of the Deer Park Heights access road is dominated by developed pastoral land consisting of introduced grasses but also contains a small lake with fringing wetland, a small degraded wetland and scattered shrubland species including matagouri, *Coprosma propinqua* and porcupine shrub. **Figure 10** shows the boundary of the rezone proposal and the location of the ecological features of the site. Photographs of the degraded wetland and fringing wetland are provided in **Figure 11** and **Figure 12**.



Figure 10: Low Density Residential Proposal to the north of Deer Park Heights access road.



Figure 11: Photograph of fringing wetland.



Figure 12: Photograph of degraded wetland.

7.57 The site is situated within an environment with less than 20% of the original vegetation cover remaining. This indicates that remaining indigenous vegetation in these environments is restricted in distribution and may contain threatened plants. Notwithstanding this point, most of the vegetation cover on the site is not indigenous vegetation. The only area of particular ecological interest is the fringing wetland, which is a distinctive ecological feature of the site. I oppose any rezoning that could result in the disturbance of this wetland. I do however note that the wetland is a very small component of the area associated with the submission. From an ecological perspective I do not oppose the proposed rezoning for most of this land.

7.58 The 12 hectare low density residential area to the south of the Deer Park Heights access road is dominated by developed pastoral land consisting of introduced grasses but also contains some areas of grey shrubland (particularly to the northeast of the site) and introduced woody weeds within the waterway that drains the site in a southwest direction. The location of these features is shown on Figure 13.

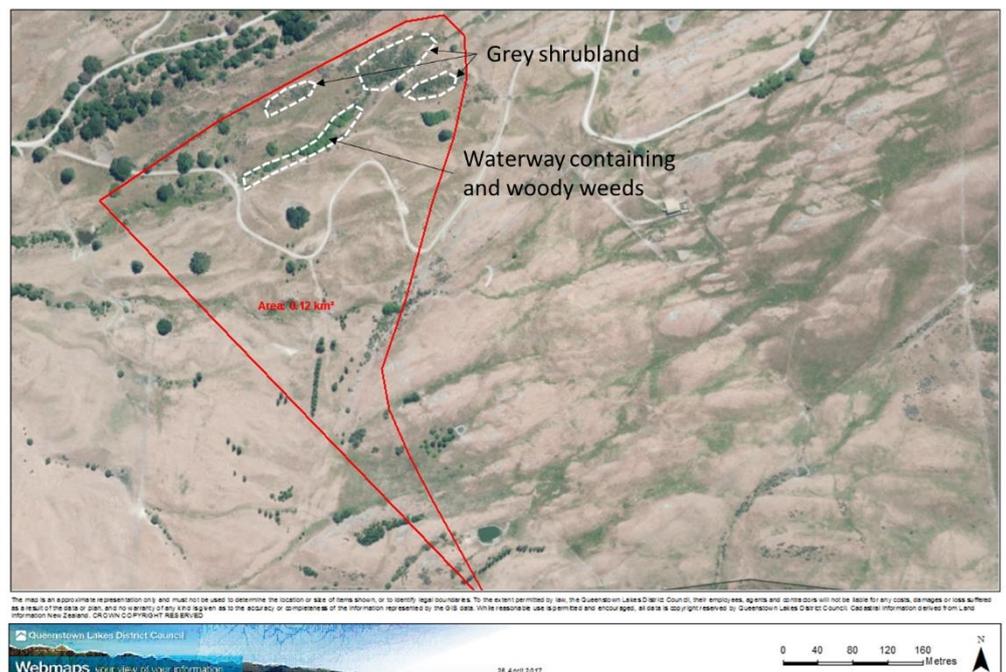


Figure 13: Low Density Residential Proposal to the north of Deer Park Heights access road.

7.59 The grey shrubland communities on the site are a degraded representative of the original shrubland communities that were present on the lower slopes of the Kelvin Peninsula prior to human settlement. They will also provide habitat for birds, lizards and invertebrates. In my view the ecological values of these areas would not meet the SNA threshold under the PDP but remain areas of indigenous vegetation with inherent value and providing habitat to birds, lizards and invertebrates. Providing the shrubland could be accommodated in a low density residential development I would not oppose the proposed rezoning of the site.

F.S Mee Developments Co Ltd – 429

7.60 F. S Mee Developments Co Ltd seeks that approximately 4 hectares of land on Peninsula Road to the south of the Hilton Hotel is rezoned from Low Density Residential to High Density Residential.

7.61 I have visited the site and note that while the vegetation is dominated by introduced woody weeds and grasses there are schist rock outcrops and small bluffs that may provide good habitat for skinks and geckos.

7.62 It is likely that rezoning the land to high density residential would increase the development footprint and may require the removal of lizard habitat. In my view this site requires a survey to be completed by a herpetologist to determine the actual lizard values on the site. Until these values are recorded I oppose the rezoning of this land.

8. REQUESTS FOR REZONINGS – QUEENSTOWN URBAN – CENTRAL, WEST AND ARTHURS POINT (1C)

QUEENSTOWN HILL ABOVE MARINA

Remarkable Heights Ltd – 347

8.1 Remarkable Heights Ltd seeks to rezone approximately 1.5 ha of land off Middleton Road from Rural to Low Density Residential. The

submitter proposes to align the Low Density Residential boundary with the current legal property boundary.

- 8.2** Aerial photographs show the site is currently infested with weeds including broom, buddleia and tree lupin.
- 8.3** Given the lack of indigenous vegetation on the site the indigenous ecological values will be limited. I therefore do not oppose the potential rezoning of the site.

Middleton Family Trust – 336

- 8.4** The Middleton Family Trust seek to remove all references to the Queenstown Heights Low Density Sub-Zone overlay from their property located on Queenstown Hill.
- 8.5** Aerial photographs show the site is infested with woody weeds including exotic pines, sycamore, broom and buddleia.
- 8.6** Given the lack of indigenous vegetation on the site the indigenous ecological values will be limited. I therefore do not oppose the potential rezoning of the site.

Mount Crystal Limited – 150

- 8.7** Mount Crystal Limited seek to rezone 2.736 ha of land off Frankton Road from Low Density Residential to a mixture of Medium Density Residential and High Density Residential. The submitter proposes to rezone the northern part of the property comprising approximately 1.24 ha to Medium Density Residential and rezone the southern part of the property comprising approximately 1.49 ha to High Density Residential. Alternately the submitter proposes to rezone the property from Low Density Residential to Medium Density Residential with a maximum height limit of 12 metres and with the provisions for visitor accommodation as applied in the High Density Residential zone.

- 8.8 Aerial photographs show the site is infested with exotic tree species including eucalypts, broom, larch and other exotic conifers.
- 8.9 Given the lack of indigenous vegetation on the site the indigenous ecological values will be limited. I therefore do not oppose the potential rezoning of the site.

Body Corporate 22362 – 389

- 8.10 Body Corporate 22362 seek to rezone approximately 10 ha of land surrounding Goldfield Heights Road from Low Density Residential to Medium Density Residential.
- 8.11 Aerial photographs of the site show residential dwellings have already been established. The site contains a mixture of exotic species and native plantings.
- 8.12 Given the lack of indigenous vegetation I do not oppose the potential rezoning of the site.

QUEENSTOWN HILL

Firestone Investment Ltd – 722

- 8.13 Firestone Investment Ltd seek confirmation of the rezone of approximately 1.2258 ha of land along Frankton Road to High Density Residential.
- 8.14 Aerial photographs show the site contains a mixture of exotic species, including a protected *Sequoiadendron giganteum* and native plantings.
- 8.15 Given the lack of indigenous vegetation on the sites, the indigenous ecological values will be limited. I therefore do not oppose the zoning of this site.

Remarkables Park Limited – 807

- 8.16** Remarkables Park Limited supports the notified Queenstown Town Centre zoning of land on Brecon Street.
- 8.17** Aerial photographs of this area show a mixture of residential dwellings, commercial and retail activities. These sites contain a mixture of exotic species and native plantings.
- 8.18** Given the lack of indigenous vegetation on the sites the indigenous ecological values will be limited. I therefore consider the notified zone is appropriate.

Alps Investment Limited – 410

- 8.19** Alps Investment Limited seek confirmation of the notified High Density Residential zone of the triangle of land bordered by State Highway 6A, Frankton Road and Sydney Street.
- 8.20** Aerial photographs of the site indicate it contains a mixture of exotic species, including a protected *Sequoiadendron giganteum*.
- 8.21** Given the lack of indigenous vegetation on the sites, the indigenous ecological values will be limited. I therefore have no preference in regards to the zoning of this site.

REQUESTS FOR LESS INTENSIVE ZONES

Grant Keeley – 1359

- 8.22** Grant Keeley seeks to rezone the area covered by 8 residential properties at 37 – 51 Kent Street from High Density Residential to Low Density Residential.
- 8.23** Aerial photographs of the site show six residential dwellings have already been established. These sites contain a mixture of exotic and native species.

- 8.24** Given the established residential nature of the sites, the indigenous ecological values will be limited. I therefore do not oppose the potential rezoning of these sites.

Peter Manthey – 75

- 8.25** Peter Manthey opposes the notified Medium Density Residential zoning of Council owned land above Vancouver Drive. Alternately, if the Medium Density Residential is to proceed, the submitter proposes that Council set aside the strip of land to the north of the Vancouver Drive properties and south of the existing gravel road.
- 8.26** Aerial photographs show the site is infested with woody weeds including douglas fir, sycamore, broom and silver birch.
- 8.27** Given the lack of indigenous vegetation on the site, the indigenous ecological values will be limited. I therefore do not oppose the notified Medium Density Residential rezoning of the site, nor any other zone type.

OTHER REZONING

NZIA Southern and Architects + Women Southern – 238

- 8.28** NZIA Southern and Architects + Women Southern seek the Low Density Residential areas around Frankton to be rezoned as Medium Density Residential. The submitter further seeks to extend the Queenstown Town Centre zone to incorporate the blocks bound by Man and Isle Street, Hay and Lake Street, Lake and Brunswick Street and also encompass the retail areas in Gorge Road. The submitter also seeks the rezoning of both sides of Gorge Road as Business Mixed Use, as well as rezoning the areas of High Density Residential that border Stanley Street from the corner of Frankton Road/State Highway 6A and Stanley Street to the intersection of Gorge Road and Stanley Street as Business Mixed Use.

- 8.29** Aerial photographs of all of these areas show a mixture of residential dwellings, commercial and retail activities and vacant land. These sites contain a mixture of exotic species and native plantings.
- 8.30** Aerial photographs of these areas show a mixture of residential dwellings, commercial and retail activities and vacant land. These sites contain a mixture of exotic species and native plantings.
- 8.31** Given the lack of indigenous vegetation in these areas the indigenous ecological values will be limited. I therefore do not oppose the potential rezoning of the sites.

P J & G H Hensman & Southern Lakes Holdings Limited – 543

- 8.32** P J & G H Hensman & Southern Lakes Holdings Limited seek the continuation of approximately 4 ha of land in the southern area of this site that fronts Edinburgh Drive as Visitor Accommodation Sub-Zone. I understand the Visitor Accommodation Sub-Zone was removed from PDP map 35 in December 2016 under clause 16 of Schedule 1 of the RMA, and will be addressed as part of Stage 2 of the PDP. Additionally, the submitter seeks the rezone of the remainder of the site from Low Density Residential to High Density Residential.
- 8.33** Aerial photographs show the site is infested with woody weeds including douglas fir, exotic conifers, broom and eucalypts.
- 8.34** Given the lack of indigenous vegetation on the site the indigenous ecological values will be limited. I therefore do not oppose the potential rezoning of the site.

Queenstown Lakes District Council – 790

- 8.35** Queenstown Lakes District Council seek to rezone approximately 0.085 ha of reserve land that has a frontage to Boyes Road to Low Density Residential.
- 8.36** Aerial photographs of the site show the site contains a mixture of exotic species.

- 8.37** Given the lack of indigenous vegetation on the site, the indigenous ecological values will be limited. I therefore do not oppose the potential rezoning of the site.

Allium Trustees Limited – 718

- 8.38** Allium Trustees Limited seek to rezone 11 & 15 Belfast Terrace and 2, 4, 6, 8, 10A, 10B, 12, 14A, 14B, 16 and 20 Manchester Place from Low Density Residential to High Density Residential.

- 8.39** Aerial photographs show a mixture of residential dwellings and vacant sections. These sites contain a mixture of exotic species and native plantings.

- 8.40** Given the lack of indigenous vegetation on the site, the indigenous ecological values will be limited. I therefore do not oppose the potential rezoning of these sites.

Garth Makowski – 686; Belfast Corporation Limited – 727 and Mulwood Investments Limited – 731

- 8.41** Garth Makowski, Belfast Corporation Limited and Mulwood Investments Limited seek to rezone properties along Belfast Terrace and Limerick Lane from Medium Density Residential back to High Density Residential.

- 8.42** Aerial photographs show a mixture of residential dwellings and vacant sections. These sites contain a combination of exotic and native plantings.

- 8.43** Given the established residential nature of the sites, the indigenous ecological values will be limited. I therefore do not oppose the potential rezoning of these sites.

YORK STREET

Sue Knowles – 7; Diane Dever – 193 and Body Corp 27490 – 363

- 8.44** Sue Knowles; Diane Dever and Body Corp 27490 seek to rezone 1, 3, 9 and 11 York Street from High Density Residential to Low Density Residential. The submitters propose that all properties that are accessed off the York Street Right of Way are zoned Low Density Residential.
- 8.45** Aerial photographs show a mixture of residential dwellings and vacant sections. These sites contain a combination of exotic and native plantings.
- 8.46** Given the established residential nature of the sites, the indigenous ecological values will be limited. I therefore do not oppose the proposed rezoning of these sites.

PARK STREET/ GARDENS

DJ and EJ Cassells, The Bulling Family, The Bennett Family, M Lynch – 503 and Friends of the Wakatipu Gardens and Reserves Incorporated – 506

- 8.47** These submitters seek to rezone the properties within the two blocks bound by Hobart Street and Park Street from notified Medium Density Residential to High Density Residential.
- 8.48** Aerial photographs of the site show a mixture of residential dwellings and vacant sections. These sites contain a combination of exotic and native plantings.
- 8.49** Given the established residential nature of the sites, the indigenous ecological values will be limited. I therefore do not oppose the potential rezoning of these sites.

Janice Kinealy – 821

8.50 Jan Kinealy opposes the notified Medium Density Residential zoning of land around the Brisbane Street area, and seeks that this land retain the operative High Density Sub-Zone C zone. The Group 1C section 42A report interprets the submitter's request as being for a less intensive zoning.

8.51 Aerial photographs show a mixture of residential dwellings and vacant sections. These sites contain a combination of exotic and native plantings.

8.52 Given the established residential nature of the area, the indigenous ecological values will be limited. I have no preference for either the notified Medium Density residential zone or a less intensive zone.

Peter Flemming and others – 599

8.53 Peter Flemming and others oppose the notified Medium Density Residential zoning of the Park Street area (which also contains a small area zoned High Density Residential), but do not specify the exact area or alternative zoning sought. The Group 1C section 42A report interprets the request as seeking a downzoning.

8.54 Aerial photographs show a mixture of residential dwellings and vacant sections. These sites contain a combination of exotic and native plantings.

8.55 Given the established residential nature of the area, the indigenous ecological values will be limited. I therefore have no preference for either the notified Medium Density residential zone or a less intensive zone.

Millennium & Copthorne Hotels New Zealand Limited – 182

8.56 Millennium & Copthorne Hotels New Zealand Limited seek confirmation of the High Density Residential zoning of 32 Frankton Road.

8.57 Aerial photographs show the site has been developed and contains a mixture of exotic and native plantings.

8.58 Given the established nature of the site, the indigenous ecological values will be limited. I therefore have no issues with the High Density Residential zoning of this site.

Pouナムu Body Corporate Committee – 208

8.59 No ecological comment is required in regards to this submission.

Aws Trustees No 31 Limited – 641

8.60 Aws Trustees No 31 Limited seek confirmation of the High Density Residential zoning of 53, 57, 61 and 65 Frankton Road.

8.61 Aerial photographs show the site is vacant and contains exotic species.

8.62 Given the lack of indigenous vegetation on the site the indigenous ecological values will be limited. I therefore do not oppose the High Density Residential zoning of the site.

OTHER REZONINGS

Millennium & Copthorne Hotels New Zealand Limited – 679

8.63 Millennium & Copthorne Hotels New Zealand Limited seek to rezone 1.87 ha of land comprising the Copthorne Hotel and Resort Queenstown Lakefront at 27 Frankton Road from Medium Density Residential to High Density Residential. Alternately, the submitter seeks a zone which provides for hotels at the height of the current development.

8.64 Aerial photographs show the site has been developed and contains a mixture of exotic and native plantings.

8.65 Given the established nature of the site, the indigenous ecological values will be limited. I therefore do not oppose the potential rezoning of this area.

Dato Tan Chin Nam – 61

8.66 Dato Tan Chin Nam seeks to rezone the land bound by State Highway 6A, Adelaide Street, Park Street and Suburb Street from Medium Density Residential to High Density Residential.

8.67 Aerial photographs show a mixture of development and vacant sections. These sites contain a combination of exotic and native plantings.

8.68 Given the established nature of the site, the indigenous ecological values will be limited. I therefore do not oppose the potential rezoning of this area.

Neville Mahon – 628

8.69 Neville Mahon seeks to rezone 1, 9 and 13 Brisbane Street and 2, 4, 6, 8, 12, 18, 20, 24 and 26 Park Street from Medium Density Residential to High Density Residential.

8.70 Aerial photographs show a mixture of residential dwellings and vacant sections. These sites contain a combination of exotic and native plantings.

8.71 Given the established residential nature of the area, the indigenous ecological values will be limited. I therefore do not oppose the potential rezoning of these sites.

FERNHILL/ SUNSHINE BAY

Sean & Jane McLeod – 391

8.72 Sean and Jane McLeod seek to extend the Medium Residential Zone to include the lower slopes of Fernhill and Sunshine Bay and extend

this zone all the way along Frankton Road from the existing High Density areas to include Panorama Terrace, Larchwood Heights, St Andrews Park, Goldfields, Battery Hill, Marina Heights and everything in between. The submitter also seeks that the land opposite Glenda drive is rezoned from Medium Density Residential to Low Density Residential.

- 8.73** Aerial photographs show a mixture of development and vacant sections. These areas contain a combination of exotic species and native plantings.
- 8.74** Given the lack of indigenous vegetation on the sites the indigenous ecological values will be limited. I therefore do not oppose the potential rezoning of these areas.
- 8.75** The submitter also proposes to rezone any land that is Large Lot Residential to Low Density Residential. The relevant PDP planning maps (32, 34, 35 and 37) do not show any Large Lot Residential Zone in these areas and therefore I have not commented on whether it is appropriate or otherwise from an ecological perspective.

Mr Trevor William Oliver – 479

- 8.76** Mr Trevor William Oliver seeks to rezone the residential block between Wynyard Crescent and Fernhill Road from notified Medium Density Residential to Low Density Residential.
- 8.77** Aerial photographs of the site show a mixture of residential dwellings. These sites contain a combination of exotic and native plantings.
- 8.78** Given the established residential nature of the sites, the indigenous ecological values will be limited. I therefore do not oppose the potential rezoning of this area.

Reddy Group Limited – 699

- 8.79** Reddy Group Limited seek to retain or rezone the land included in 139 Fernhill Road, 10, 12, 14 and 16 Richards Park Road and 20

Aspen Grove as Medium Density Residential and the Visitor Accommodation Sub-Zone. I understand the Visitor Accommodation Sub-Zone was removed from PDP map 34 in December 2016 under clause 16 of Schedule 1 of the RMA and will be considered in Stage 2.

8.80 Aerial photographs show a mixture of development and vacant sections. These sites contain a combination of exotic and native plantings.

8.81 Given the established nature of the area, the indigenous ecological values will be limited. I therefore do not oppose the potential rezoning of these sites.

Hurtell Proprietary Limited, Landeena Holdings, Shellmint Proprietary Limited – 97

8.82 Hurtell Proprietary Limited, Landeena Holdings and Shellmint Proprietary Limited seek to rezone approximately 1.5237 ha of land at 102-108 Wynyard Crescent from Low Density Residential to Medium Density Residential or High Density Residential.

8.83 Aerial photographs show the site is infested with woody weeds including exotic conifers and broom.

8.84 Given the lack of indigenous vegetation on the site, the indigenous ecological values will be limited. I therefore do not oppose the potential rezoning of the site.

GORGE ROAD

Jeff Aldridge – 86

8.85 Jeff Aldridge supports the High Density Residential zoning along Gorge Road and seeks that it is viewed as a worker accommodation area.

- 8.86** Aerial photographs show residential dwellings have already been established in this area. These sites contain a combination of exotic and native plantings.
- 8.87** Given the established nature of the area, the indigenous ecological values will be limited. I therefore do not oppose the potential rezoning of this area.

Westwood Group – 70

- 8.88** The Westwood Group seeks the establishment of a Steamer Wharf Entertainment zone within the Queenstown Town Centre zone. The submitter also supports the Business Mixed Use zone but seeks an extension to the zone to include the area from Boundary Street to Robins Road. The submitter seeks to rezone these sites from High Density Residential to the Business Mixed Use zone.
- 8.89** Aerial photographs show a mixture of businesses, residential dwellings and vacant sections. These sites contain a combination of exotic and native plantings.
- 8.90** Given the established nature of these areas, the indigenous ecological values will be limited. I therefore do not oppose the potential rezoning of these areas.

PR Queenstown Ltd – 102

- 8.91** PR Queenstown Ltd supports the Business Mixed Use zone but seeks an extension to include 30-46 Gorge Road. The submitter seeks to rezone these sites from High Density Residential to Business Mixed Use zone.
- 8.92** Aerial photographs show a mixture of residential dwellings and vacant sections. These sites contain a combination of exotic and native plantings.

8.93 Given the established nature of these areas, the indigenous ecological values will be limited. I therefore do not oppose the potential rezoning of these areas.

Neki Patel – 103

8.94 Neki Patel supports the Business Mixed Use zone but seeks an extension to include 30-46 Gorge Road. The submitter seeks to rezone these sites from High Density Residential to Business Mixed Use zone.

8.95 Aerial photographs show a mixture of residential dwellings and vacant sections. These sites contain a combination of exotic and native plantings.

8.96 Given the established nature of these areas, the indigenous ecological values will be limited. I therefore do not oppose the potential rezoning of these areas.

Hamish Munro – 104

8.97 Hamish Munro seeks an extension to the Business Mixed Use zone to include 30-46 Gorge Road. The submitter seeks to rezone these sites from High Density Residential to Business Mixed Use zone.

8.98 Aerial photographs show a mixture of residential dwellings and vacant sections. These sites contain a combination of exotic and native plantings.

8.99 Given the established nature of these areas, the indigenous ecological values will be limited. I therefore do not oppose the potential rezoning of these areas.

Barry Sarginson – 107

8.100 Barry Sarginson seeks an extension to the Business Mixed Use zone to include 30-46 Gorge Road. The submitter seeks to rezone these sites from High Density Residential to Business Mixed Use zone.

8.101 Aerial photographs show a mixture of residential dwellings and vacant sections. These sites contain a combination of exotic and native plantings.

8.102 Given the established nature of these areas, the indigenous ecological values will be limited. I therefore do not oppose the potential rezoning of these areas.

Clyde Macintyre – 108

8.103 Clyde Macintyre seeks an extension to the Business Mixed Use zone to include 30-46 Gorge Road. The submitter seeks to rezone these sites from High Density Residential to Business Mixed Use zone.

8.104 Aerial photographs show a mixture of residential dwellings and vacant sections. These sites contain a combination of exotic and native plantings.

8.105 Given the established nature of these areas, the indigenous ecological values will be limited. I therefore do not oppose the potential rezoning of these areas.

ARTHURS POINT

Ngāi Tahu Tourism – 716

8.106 Ngāi Tahu Tourism have sought to rezone Morning Star Beach Recreation Reserve from notified Rural to (operative) Rural Visitor or a Visitor Zone.

8.107 I viewed the Morning Star Beach Recreation Reserve on 26 April 2017. The vegetation on the reserve is dominated by introduced woody weed species, notably sycamore, broom, blackberry, hawthorn and larch. The site also contains mature introduced pine trees. Some indigenous plant species are present naturally such as prickly shield fern and *Muehlenbeckia australis* along with and scattered matagouri. However, there are no stands of indigenous species that

would meet the PDP definition of indigenous vegetation. I note there are areas of restoration plantings.

- 8.108** Given the lack of natural indigenous communities, the ecological values of the site are low. From an ecological perspective I do not oppose the proposed rezoning of Morning Star Beach Reserve.

Sam Strain – 349

- 8.109** Sam Strain has sought to rezone two properties on Arthurs Point Road adjacent to Morning Star Beach Recreation Reserve from notified Rural Zoning to Low Density Residential Zone.

- 8.110** Based on aerial photograph interpretation and my knowledge of the neighbouring Morning Star Beach Recreation Reserve, I can confirm indigenous vegetation is not present on the site.

- 8.111** From an ecological perspective I do not oppose Sam Strain's proposal to rezone these two properties.

Michael Swan – 494 and Larchmont Developments Limited – 527

- 8.112** Michael Swan and Larchmont Developments Limited seek to rezone 111 Atley Road on the southern boundary of Atley Downs subdivision from notified Rural to Low Density Residential Zone

- 8.113** I viewed the site from the neighbouring road on the 26 April 2017. The vegetation on the site is dominated by manicured grass and planted areas, with the remainder of the site to the south and east covered in mature introduced trees including silver birch, larch and other introduced conifers.

- 8.114** Based on the lack of indigenous vegetation communities on the site, I do not oppose the proposed rezoning from an ecological perspective.

Alpine Estate Ltd – 450

- 8.115** Alpine Estate Ltd has sought to rezone 4.1 hectares of land at 153 Arthurs Point Road, Arthurs Point from notified Low Density Residential Zone to High Density Residential Zone.
- 8.116** I have viewed this property from Arthurs Point Road and can confirm that lower parts of the site are currently under development with the steeper slopes to the north of the site covered in rank long grass, broom and young exotic wilding pine trees.
- 8.117** Based on the lack of indigenous vegetation communities on the site, I do not oppose the proposed rezoning from an ecological perspective.

Darryl Sampson & Louise Cooper – 495

- 8.118** Darryl Sampson and Louise Cooper have sought to rezone approximately 1.3 hectares of 182D Arthurs Point Road, Arthurs Point from notified Rural Zone to Rural Visitor Zone.
- 8.119** Based on aerial photographic interpretation, the site is largely domesticated with planted trees and manicured lawns with an area of wood weeds (sycamore, rowan, hawthorn and broom) present to the west of the site at the top of the Shotover River terrace riser.
- 8.120** Based on the lack of indigenous vegetation communities on the site, I do not oppose the proposed rezoning from an ecological perspective.

Mandalea Properties – 642

- 8.121** Mandalea Properties has sought to rezone approximately 6000m² at 164 Arthurs Point Road, Arthurs Point from notified Rural to (operative) Rural Visitor Zone.
- 8.122** Based on aerial photographic interpretation and my understanding of vegetation on the site I understand the proposed area is covered in

introduced woody weeds, particularly sycamore, rowan, hawthorn and broom.

8.123 Based on the lack of indigenous vegetation communities on the site, I do not oppose the proposed rezoning from an ecological perspective.

9. REQUESTS FOR REZONINGS – QUEENSTOWN URBAN – JACKS POINT (1D)

Jardine Family Trust & Remarkables Station Ltd – 715

9.1 The Jardine Family & Remarkables Station Ltd seeks to rezone land legally described as Lots 1 – 7 DP 452315 and Lot 8 DP 44832 (comprising 163.46ha) from Rural Zone to Jacks Point Zone. The land is located at Homestead Bay, to the south east of the notified Jacks Point Zone. The submitter also seeks that the Jacks Point Structure Plan is extended to cover this land, in a way that provides for education and innovation-related business, and also for residential development interspersed with open space areas. The submitter seeks that the UGB be extended to include the land sought to be rezoned.

9.2 Based on the Potential Natural Vegetation information⁵ and my knowledge of the site I understand the original pre-settlement vegetation of the subject site would have consisted of scrub, shrubland and tussock grassland. This vegetation has almost been entirely removed from the site with remnants representative of the original vegetation only found in the incised gullies, the lake terrace riser and on the lower slopes of Jacks Point.

9.3 In general I do not oppose the submission on the grounds that most of the development footprint will occur on former pastoral land with no existing indigenous vegetation. The only area of ecological constraint associated with the proposal that I consider should be addressed is the area of open space residential activity proposed on the lower southern slopes of Jacks Point. This area is shown in Error! Reference source not found. and contains strongly regenerating

5 Using a tool provided by Landcare Research at <http://ourenvironment.scinfo.org.nz>

bracken fern with shrubland developing through the bracken. This vegetation is situated within an environment where the indigenous vegetation cover remaining nationally is less than 20%. It is therefore a priority for protection. The area is also connected to the wider area of Jacks Point where bracken fern is regenerating strongly. Furthermore, there is a source of broadleaf indigenous forest on the northwest lower faces of Jacks Point that will supply the ongoing regeneration of Jacks Point.



Figure 14: Area of bracken fern and regenerating shrubland.

Wild Grass Partnership, Wild Grass Investments No 1 Ltd & Horizons Investment Trust – 567

9.4 Wild Grass Partnership, Wild Grass Investments No 1 Ltd & Horizons Investment Trust seek the expansion of the Lodge Activity Area by 1.58 ha across Lot 3 and Lot 1 DP 447241, as illustrated in Appendix A and B of this submission. The submitter further seeks a 1.80 ha Lodge Parking Activity Area in the extreme eastern area of Lot 2.

9.5 Aerial photographs show the proposed extension areas contain scattered patches of indigenous grey scrubland.

9.6 These areas are unlikely to meet the SNA threshold under the district plan but remain areas of indigenous vegetation with inherent value and providing habitat to birds, lizards and invertebrates. Providing the shrubland areas are accommodated during any further development, I would not oppose the proposed rezoning of these areas.

A handwritten signature in black ink. The signature consists of a large, stylized 'G' that loops around the word 'avis', which is written in a smaller, cursive font to the right of the 'G'.

Glenn Alister Davis

24 May 2017