

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

IN THE MATTER of the Resource
Management Act 1991

AND

IN THE MATTER of the Rezoning Hearing
Stream 11 (Ski Area
Sub Zones)

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

ECOLOGIST - CARDRONA AND TREBLE CONE

10 March 2017

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TABLE OF CONTENTS

1. INTRODUCTION	1
2. SCOPE	2
3. EXECUTIVE SUMMARY	2
4. BACKGROUND	4
5. CARDRONA.....	9
6. TREBLE CONE.....	15

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 (**Council** or **QLDC**). 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 Land Act 1998. 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 Volume 1, Appendix 5 of the ODP [**CB48**].
- 1.4 I provided evidence in relation to Chapter 33 (Indigenous Vegetation & Biodiversity) [**CB22**] of the Proposed District Plan (**PDP**) in Hearing Stream 02.
- 1.5 I have now been engaged by QLDC to provide evidence in relation to submissions that seek that land zoned Rural General at Cardrona and Treble Cone, be included within the Ski Area Sub Zone (**SASZ** or **Sub Zone**).
- 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 The key documents I have used, or referred to, in forming my view while preparing this brief of evidence are as follows:

- (a) my Evidence for the Rural Hearing Stream 02 (ecologist), dated 6 April 2016 **[CB48]**;
- (b) Section 42A report for Indigenous Vegetation and Biodiversity Chapter 33 dated 7 April 2016 **[CB45]**;
- (c) Right of Reply for Indigenous Vegetation and Biodiversity Chapter 33 dated 3 June 2016 **[CB46]**;
- (d) Reply Chapter 33, Indigenous Vegetation and Biodiversity dated 3 June 2016 **[CB22]**;
- (e) Branch Creek Conservation Resources Report (LINZ, July 2006);
- (f) Cattle Flat Conservation Resources Report (LINZ, November 2002);
- (g) The Ecological Values of Mt Cardrona Station (Conservation Consultancy, 2006; and
- (h) Notified Planning Maps 7, 10, and 24 **[CB27]**.

2. SCOPE

2.1 I consider, from an ecological perspective, the submissions that seek that land zoned Rural General at Cardrona and Treble Cone, be included within the SASZ.

2.2 In assessing the site-specific submissions, I have considered the significance of indigenous vegetation and habitats at each site, the likely effects that ski field development could have in those areas ("Ski Area Activities" as defined in the PDP), the relevant PDP policy framework that would apply to these areas, and other legal instruments that would apply.

2.3 All references to PDP provision numbers, are to the Council's Reply version of those provisions (unless otherwise stated).

3. EXECUTIVE SUMMARY

Extension of Ski Area Sub Zone at Cardrona

3.1 The area that is the subject of the Mt Cardrona Station Limited submission (407) has had a long history of pastoral activity and the vegetation cover is

dominated by introduced pasture grasses. Given the lack of indigenous vegetation in this area, development activities on the site associated with Ski Area Activities are unlikely to disturb indigenous ecosystems. I therefore do not oppose the Mt Cardrona Station SASZ extension from an ecological perspective.

- 3.2** The area that is the subject of the Cardrona Alpine Resort Limited submission (615) has largely been developed for pastoral farming including the ploughing of soils to support development of pasture. A wetland is present at lower elevations to the east of the submission area. I visited the wetland on 21 February 2017 to assess if the wetland contained any remaining ecological values. I can confirm from this visit that the wetland has been developed and the indigenous ecosystem removed. I therefore do not oppose the Cardrona Alpine Resort proposal from an ecological perspective.
- 3.3** The area that is the subject of the Soho Ski Area Limited submission (610) ranges in elevation from 600 to 1000 metres above sea level (**masl**) and consists of developed agricultural land with shrubland communities located within Little Meg Creek and Callaghans Creek. I visited this site on 21 February 2017. The shrubland communities are representative (albeit modified) of dryland environments that support threatened plants, and provide important habitat for a diverse endemic invertebrate fauna and the threatened (at risk – recovering) eastern falcon. Both shrubland communities have significant ecological values that I consider are better protected within the Rural Zone where Ski Area Activities are not a permitted activity. With the exception of this shrubland area (which I oppose) I do not oppose the SASZ extension as requested by Soho.
- 3.4** The area that is the subject of the Anderson Branch Creek submission (829) ranges in elevation from 900 masl to approximately 1700 masl. The proposed area contains a number of fragile communities especially alpine wetlands and alpine cushionfields that will be very sensitive to development activities. Given the high ecological values present within the proposed area, further detailed ecological impact assessment would need to be undertaken before making a determination on the ability of the area to absorb the level of development that is permitted within the sub zone.

Extension of Ski Area Sub Zone at Treble Cone

3.5 I visited the area on 31 January 2017. The area that is the subject of the Treble Cone submission (613) ranges in elevation from 300 to 1000 masl. Most of the area has had a long history of pastoral activity and has been oversown and topdressed to an elevation of approximately 900 masl. The area contains a shrubland and beech forest on the northern boundary of the proposed sub zone (refer to **Figure 5**) that, in my opinion, should be excluded from the zone. Providing this area is not included in an extension to the sub zone, I consider the ecological effects associated with Ski Area Activities would be minor. With the exception of the area shown in **Figure 5**, I therefore do not oppose the Treble Cone ski area submission.

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). This evidence **[CB48]** discussed the Significant Indigenous Vegetation and Habitats project I undertook on behalf of the Council, 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).

Relevant PDP plan provisions – Council Reply position

4.2 I am aware that under Rule 33.3.2.3 the Indigenous Vegetation and Biodiversity rules apply to the SASZ. The clearance of indigenous vegetation within Alpine Environments – land higher than 1070 masl - is a Discretionary Activity in all circumstances (Rule 33.5.10). The only exemption to this is in Rule 33.3.4.4 where in the SASZ, on land administered under the Conservation Act 1987, indigenous vegetation clearance is exempt from the rules where the relevant approval has been obtained from the Department of Conservation. The clearance must not exceed the approval, the Council must be provided with a copy of the application and approval, and the Council must be satisfied that the application adequately identifies the indigenous vegetation to be cleared and the effects of the clearance.

4.3 This "DOC land" exemption applies to the SASZ extension submission at Treble Cone as the relevant land is administered under the Conservation Act 1987. It does not apply to the SASZ extension requests at Cardrona.

4.4 In terms of relevant definitions, the Council's position on the "Ski Area Activities" and "passenger lift systems" definitions are as follows [CB2]:

<p>Ski Area Activities</p>	<p>Means the use of natural and physical resources for the purpose of providing for <u>establishing, operating and maintaining the following activities and structures:</u></p> <ul style="list-style-type: none"> • recreational activities either commercial or non-commercial; • chairlifts, t-bars and rope tows to facilitate commercial recreational activities <u>passenger lift systems;</u> • use of snowgroomers, snowmobiles and 4WD vehicles for support or operational activities-; • activities ancillary to commercial recreational activities <u>including avalanche safety, ski patrol, formation of snow trails and terrain-;</u> • <u>installation and operation of snow making infrastructure including reservoirs, pumps and snow makers-; and</u> • in the Waiorau Snow Farm Ski Area Sub Zone vehicle and product testing activities, being activities designed to test the safety, efficiency and durability of vehicles, their parts and accessories.
<p><u>Passenger lift systems</u></p>	<p><u>Means any mechanical system used to convey or transport passengers within or to a Ski Area Sub Zone, including chairlifts, gondolas, T-bars and rope tows, and including all moving, fixed and ancillary components of such systems such as towers, pylons, cross arms, pulleys, cables, chairs, cabins, and structures to enable the embarking and disembarking of passengers. Excludes base and terminal buildings.</u></p>

4.5 Ski Area Activities within the SASZ are permitted activities (Rule 21.4.18). Table 7 of Chapter 21 is relevant to the SASZ, with the activities listed in that table being controlled activities (with the exception of Visitor Accommodation, which is restricted discretionary). Controlled activities include the construction, relocation, addition or alternation of a building (which would include a

terminal/base building), and Passenger Lift Systems. Car parks and commercial activities are not included in the Ski Area Activities definition and so would be assessed under the general provisions for the underlying Rural zone (although I note commercial recreational activities are a Ski Area Activity).

- 4.6** I also understand that under Rule 21.4.19, Ski Area Activities not located within a SASZ are non-complying activities, with the specific exception of commercial heli-skiing (which is to be treated as a commercial recreation activity under Rule 21.4.16 and therefore permitted if it met the standards in Table 5).
- 4.7** I understand that non-commercial skiing would fall within the definition of a Recreation Activity and would therefore be permitted under Rule 21.4.27. Otherwise commercial recreational activities fall within the definition of Ski Area Activities. Visitor Accommodation is a restricted discretionary activity through reply Rule 21.5.X.¹

Earthworks

- 4.8** I understand that earthworks in the Ski Area Sub Zones are currently exempt from the earthworks rules in the Operative District Plan, chapter 22. I also understand that Council has resolved to notify the earthworks chapter in Stage 2 of the Review as far as it applies to Volume 1 land (ie which includes the land I am considering in this evidence), and therefore I do not know at this point in time whether earthworks in the SASZ will remain exempt, or whether specific standards will be notified in Stage 2. I refer to Section 6 of Ms Banks' strategic statement of evidence, where she states that it would not be reasonable to assume that the current exemption for earthworks in the SASZ, will extend to any new land zoned SASZ through this hearing.

Overview of the Cardrona and Treble Cone ski fields

- 4.9** Cardrona and Treble Cone are located in the Wanaka and Shotover Ecological District, which are part of the greater Lakes Ecological Region². Ecological districts are defined by their geological, topographical, climatic and biological

¹ 'X' appears to be a placeholder in this reply rule number.

² Lucas Associates (1995) Indigenous Ecosystems. An Ecological Structure for the Lakes District. A report to the Queenstown Lakes District Council.

features and processes. The notified Cardrona SASZ straddles the boundary between these two ecological districts as a result of their catchment areas. The Cardrona and Treble Cone areas contain a range of ecological communities over a wide geographical area and altitudinal gradient. Ecological communities include snow tussock grassland, short tussock grassland, beech forest, shrubland, a wide range of wetland types and shrubland communities dispersed in amongst exotic pasture grasslands.

- 4.10** Altitudinal gradient and agricultural activities associated with the existing Cardrona and Treble Cone ski areas are the key factors driving the distribution of ecological communities. The lower to mid altitudinal slopes up to approximately 900 masl have had a long history of pastoral activities including historical burning and grazing regimes and oversowing and topdressing. These activities have resulted in the largescale removal of the original indigenous shrubland and forest systems and replacement with pastoral communities. Notwithstanding this point, indigenous vegetation remains in areas where undertaking agricultural activities is difficult, such as around rock outcrops and incised gulleys. In some areas shrubland dominated by matagouri, *Coprosma propinqua* and the introduced briar has developed where pastures have not been maintained.
- 4.11** The shrubland communities on the lower slopes provide important habitat for invertebrates, lizards and insectivorous birds. These systems are ecologically important for the threatened eastern Falcon, which is listed on the New Zealand Threat Classification List³ as 'at risk – recovering' as these birds hunt for passerines within the low to mid altitudinal shrubland communities.
- 4.12** At higher altitudes above 900 masl the vegetation cover grades into more natural systems dominated by tall tussock grasslands, *Dracophyllum* shrublands, wetlands and at higher elevations alpine cushionfields.

Assessment

- 4.13** In assessing the site-specific submissions, I have considered the ecological values present on each site based on field and desktop assessments. A site visit was undertaken to the area subject to the submission at Treble Cone on 31 January 2017.

³ Hugh Robertson, John Dowding, Graeme Elliott, Rod Hitchmough, Colin Miskelly, Colin O'Donnell, Ralph Powlesland, Paul Sagar, Paul Scofield, Graeme Taylor 2013. New Zealand Threat Classification Series 4. 22 p.

- 4.14** A site visit of shrublands in the Soho ski field area (submission 610) and the wetland in the Cardrona Alpine Resort Limited area (submission 615) were completed on 21 February 2017. I also undertook ecological surveys and site visits in December 2014 and March 2015 on the wider Soho ski field situated adjacent to the Cardrona ski field to review consent applications (on behalf of QLDC) for the development of the Soho ski area access road and the ski field. I have reviewed ecological reports completed on Mt Cardrona Station and Conservation Resources Reports prepared for Branch Creek Station. I have also visited nearby high country properties including Glencoe Station, Branch Creek Station and Spott Creek Station during the Significant Indigenous Vegetation and Habitat project. Therefore, I am familiar with the ecological values present at all of the sites proposed for rezoning at Cardrona.
- 4.15** My assessment of the submissions recognises that extending the SASZ over the notified Rural Zone provides a more enabling planning framework for Ski Area Activities that have the potential to permanently remove indigenous vegetation and habitat through the development of gondolas, ski lifts and ski trails and snow making infrastructure. This is particularly the case if the SASZ is located on land administered under the Conservation Act. This exemption for DoC land also applies to any land that is higher than 1070 masl, where Rule 33.5.10.1 includes a blanket no clearance rule.
- 4.16** Finally, I note for context that the likes of gondolas could be used during the summer, for the purposes of mountain biking during the summer. The definition of Ski Area Activities and Passenger Lift systems does not preclude these types of activities, although I do understand that 'Passenger Lift Systems' would be controlled activities in the Council's framework, meaning consent could not be declined.

5. CARDRONA

5.1 **Figure 1** shows the location of the four Cardrona Ski Area Subzone requests.

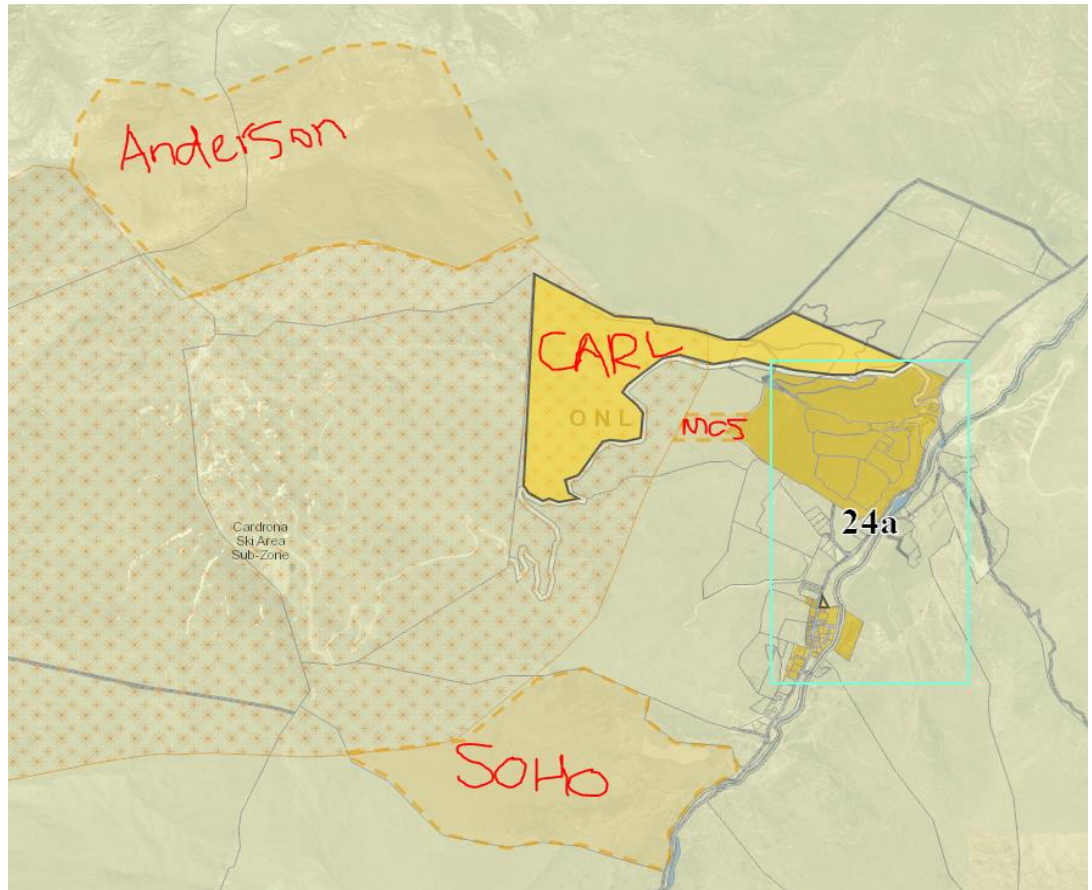


Figure 1: Requested extensions to Cardrona SASZ

Cardrona Alpine Resort Limited (615) – "Cardrona Resort or CARL"

(opposed in part by MCSL FS1153, supported by Cardrona Valley Residents and Ratepayers Society FS1105 and Kay Curtis FS1137)

- 5.2 Cardrona Resort has sought that an area of land on Planning Map 10, located between the notified SASZ at Cardrona and the ODP Mt Cardrona Station Special Zone (an ODP zone), be included within the SASZ, or be renamed a bespoke 'Cardrona Alpine Resort Area'. The proposed extension is for the purposes of enabling the construction and operation of a Passenger Lift System (ie, a gondola link).
- 5.3 Cardrona Resort also seek "*development and expansion of tourism activities and visitor accommodation within the identified area*" to cater for four season tourism activities.

Mt Cardrona Station Limited (407) – "MCSL"

(opposed by Soho FS1329)

5.4 MCSL has sought that an area of land located between the notified SASZ and the Mount Cardrona Station Special Zone (on Planning Maps 10 and 24) be included within the SASZ, also with the aim of advancing the opportunities for access and passenger transport. The area of land sought to be rezoned is different from the Cardrona Resort submission (and also the Soho submission discussed below). MCSL also seek the connection of a gondola link to the ODP Mt Cardrona Station Special Zone.⁴

5.5 Soho Ski Area Limited (**Soho**) oppose the MCSL submission on the grounds that the proposed extension for the purposes of enabling the construction and operation of a Passenger Lift System (ie, the gondola link) from the Mt Cardrona land to the existing Cardrona ski area, will result in adverse cumulative effects on landscape and amenity values. Soho's further submission states that the most appropriate location for transportation links is from the Blackmans Creek land, in accordance with Soho's request for an extension.

Soho Ski Area Limited and Blackmans Creek No 1 LP (610) – "Soho"

(opposed by MCSL FS1153, supported by Queenstown Park Limited FS1097)

5.6 Soho has sought that an area of land located to the south east of the notified SASZ, that extends down to or near the valley floor at Cardrona (on PDP Planning Map 10) be included within the SASZ. Although not specifying a potential gondola, Soho also seeks that the Sub Zone provide for "transportation connections to ski areas", including Passenger Lift Systems.

Assessment of all three submissions

5.7 The proposed extension by Cardrona Resort is situated within an area that has been intensively developed including the ploughing of land for establishing pasture. That development has completely removed most of the indigenous vegetation cover. The only area of potential ecological interest may have been the wetland that extends over an area of approximately 1.3 ha situated at the

⁴ On 6 December 2016, MCSL submitted a plan change request which includes a request to amend the structure plan of the Mt Cardrona Station Special Zone.

eastern end of the proposed area. The location and extent of the wetland is shown in yellow in **Figure 2** below. I visited this wetland on 19 February 2017 and can confirm that indigenous vegetation has been almost entirely removed except for a population of *Carex coriacea* that has established within the pasture. Based on this finding I do not oppose CARL's submission.

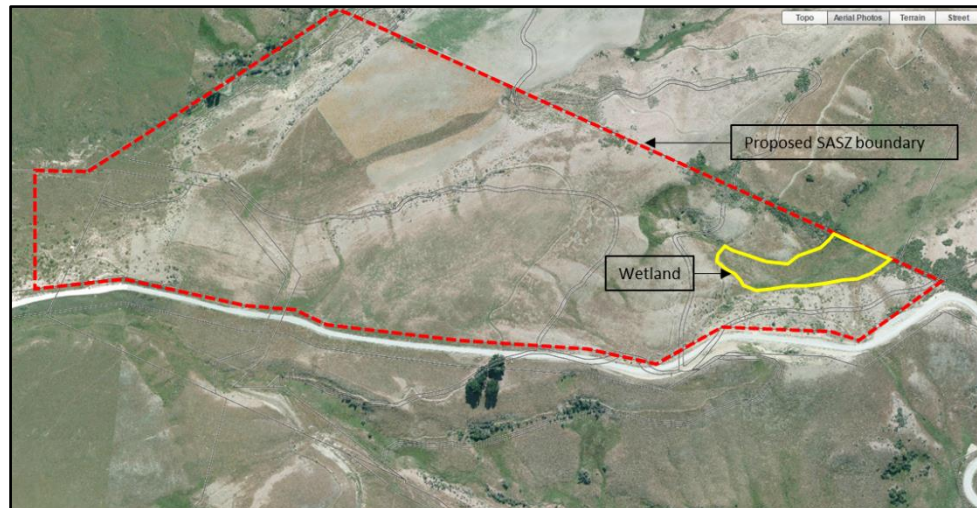


Figure 2: Cardrona Alpine Resort SASZ boundary and wetland area

5.8 The proposed extension by MCSL consists of a gentle east facing slope at an elevation of approximately 700 masl. The area has a long history of pastoral activity and is dominated by the introduced grasses browntop (*Agrostis capillaris*) and sweet vernal (*Anthoxanthum odoratum*) that are ubiquitous throughout the dryland environments of Central Otago. This community will also include areas of the introduced high country weed mouse-ear hawkweed (*Pilosella officinarum*) and a range of other introduced species including catsear (*Hypochaeris radicata*) sheep's sorrel (*Rumex acetosella*), Yorkshire fog (*Holcus lanatus*) and white clover (*Trifolium repens*). Scattered native species such as *Wahlenbergia albomarginata*, *Coprosma petriei*, *Leucopogon fraseri*, *Luzula rufa*, *Raoulia subsericea* and *Acaena caesiiglauca* will be present but are in the lower stratum and vegetation. In my view, most of the vegetation on this site does not meet the definition of indigenous vegetation in the PDP **[CB2]**.⁵ I therefore consider activities associated with the SASZ are highly unlikely to have a detrimental effect on the ecology of the site.

5.9 The area that is the subject of the Soho submission ranges in elevation from 600 to 1000 masl and consists of developed agricultural land with shrubland

⁵ The recommended definition of "Indigenous Vegetation" is: "Means vegetation that occurs naturally in New Zealand, or arrived in New Zealand without human assistance, includes both vascular and non-vascular plants."

communities located within Little Meg Creek and Callaghans Creek. The location of the shrubland communities are shown in **Figure 3**. The developed agricultural land ranges from areas that have been intensively developed where all indigenous vegetation has been removed, to grasslands that are dominated by introduced pasture grasses but also including a range of common herbs and prostrate subshrubs.

5.10 I completed a site visit to the shrubland communities on 21 February 2017 to assess the ecological values of the shrublands. I can confirm that the vegetation within Little Meg Creek consists of a grey shrubland dominated by mingimingi (*Coprosma propinqua*), matagouri (*Discaria toumatou*) and the introduced briar but also containing good populations of scented tree daisy (*Olearia odorata*) and *Olearia lineata*, along with bracken fern (*Pteridium esculentum*) and tutu (*Coriaria* spp.). This community is representative of pre-settlement dryland environments in the Cardrona Valley and contains threatened species including the ‘at risk – declining’ *Olearia lineata* and is habitat for the eastern falcon listed as ‘at risk-recovering’. Photograph 1 shows a photo of the shrubland in the middle to lower reaches of Little Meg Creek that I took during the site visit on the 21 February 2017.



Photograph 1: Shrubland within Little Meg Creek

5.11 The shrubland community in Callaghans Creek has a similar indigenous species composition to Little Meg Creek, however Callaghans Creek shrubland is smaller, more fragmented and has a much higher coverage of weeds including broom, willows and poplars. Photograph 2 shows the shrubland within the lower reaches of Callaghans Creek. Notwithstanding this point the eastern falcon was recorded in Callaghans Creek during the site visit and does support insectivorous birds that are a food source for the eastern falcon. Both shrubland communities have significant ecological values which I consider are better protected within the Rural Zone where Ski Area Activities are not a permitted activity. If these areas were excluded I would not oppose the SASZ extension as requested by Soho.



Photograph 2: Shrubland within Callaghans Creek

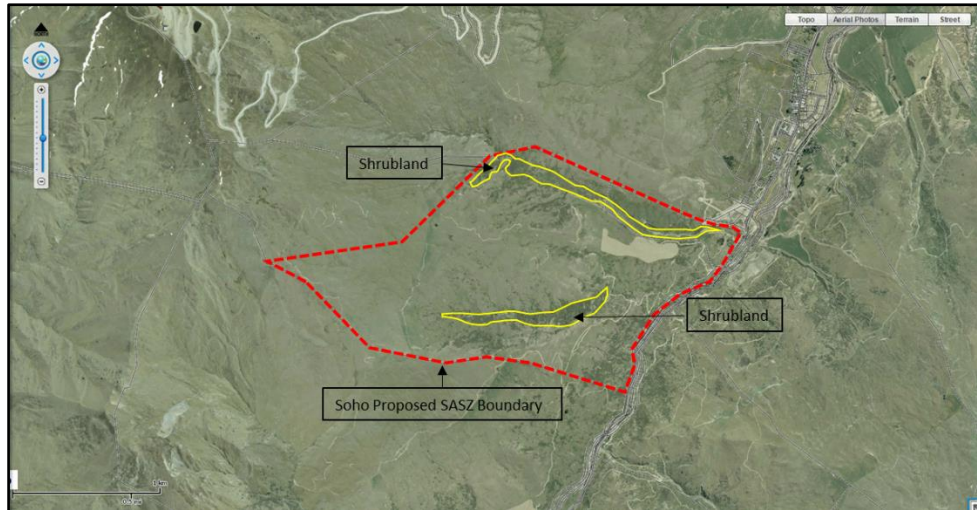


Figure 3: Soho SASZ boundary and shrubland areas

Anderson Branch Creek Limited (829)

- 5.12** Anderson Branch Creek Limited has sought that an area of land located to the north of the notified SASZ (on PDP Planning Map 10) be included within the SASZ.
- 5.13** The area sought to be added to the SASZ covers an altitudinal range from 900 masl to approximately 1800 masl. The area contains a relatively intact altitudinal sequence of ecological communities, which includes tall tussock grassland communities to an elevation of 1750 masl where the grassland grades into alpine wetlands and fellfields.
- 5.14** My knowledge of the site is based on visiting neighbouring alpine areas, a review of 2016 Google Earth aerial photographic imagery and information in the Branch Creek Conservation Resources Report (**CRR**). Based on the Branch Creek CRR I understand these communities are in very good condition and the tall tussock grasslands have a well-developed shrubland component that indicates the area has not been burnt for a long time. The vegetation communities are representative of vegetation that would have been present prior to human settlement and will support a range of indigenous invertebrates, lizards and birds including the 'nationally threatened' kea and 'at risk – recovering' eastern falcon (Branch Creek CRR).
- 5.15** Given the high ecological values present within the proposed area and the fragile alpine communities present, I consider that permitting such activities as

installation of passenger lifts, snow making infrastructure (and possibly associated earthworks depending on what is notified in Stage 2) could result in significant ecological effects such as removal of habitat, providing opportunities for weed invasion, erosion and subsequent loss of habitat through deposition of sediment onto wetlands. Given the sensitivity of the alpine environment I consider it is more appropriate to consider any proposals to extend Ski Area Activities into this environment through the non-complying activity status as set out in Rule 21.4.19.

6. TREBLE CONE

Treble Cone Investments Ltd (613)

- 6.1** Treble Cone Investments has sought that an area of land in the vicinity of the Treble Cone Ski Access Road located between Wanaka Mount Aspiring Road and the notified Treble Cone SASZ (on PDP Planning Map 7), be included within the SASZ. **Figure 4** below shows the location and extent of land associated with the proposed extension of the SASZ. Treble Cone Investments also seek provision for commercial activities associated with recreation activities (which is a controlled activity in the Council's recommendations), and on mountain Visitor Accommodation (restricted discretionary in the Council's recommendations), and residential accommodation (discretionary activity in the Council's recommendations).

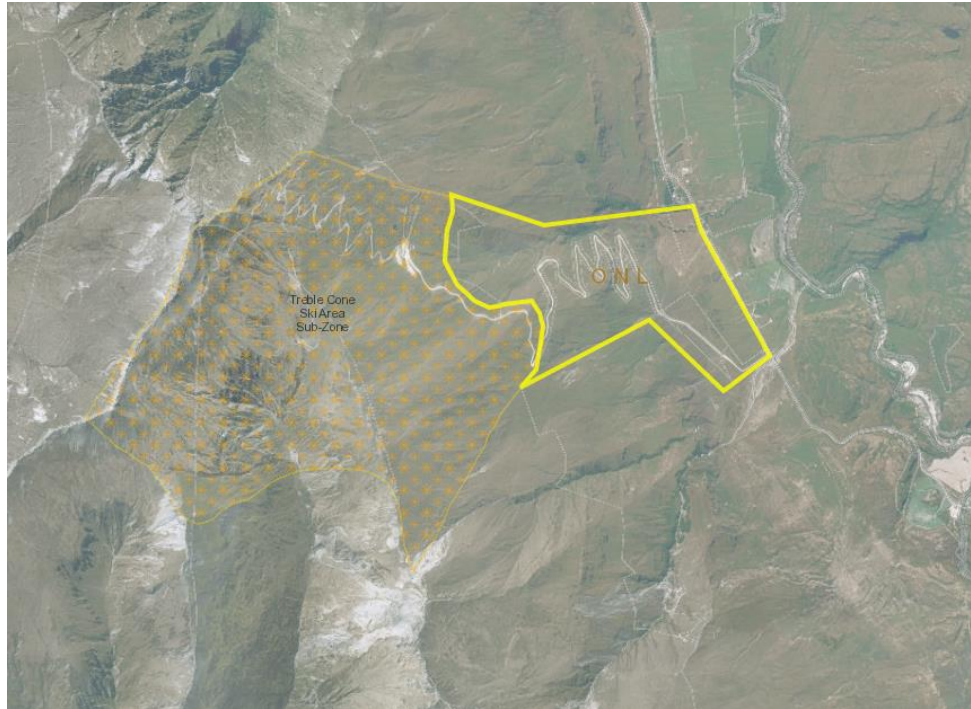


Figure 4: Treble Cone Investments Ski Area Subzone Request Location

- 6.2** The proposed extension to the notified Treble Cone Ski Area Subzone ranges in altitude from 300 to approximately 1000 masl. Most of the area has had a long history of pastoral activity including burning and grazing and has been oversown and topdressed up to about 1000 masl. While most of the area has been highly modified, there are some indigenous values including a beech forest and shrubland community on the northern boundary of the proposed area (shown in **Figure 5** below in yellow), an area of matagouri shrubland situated between the Treble Cone Ski Access Road and Wanaka Mount Aspiring Road and small areas of the shrubland and wetlands.

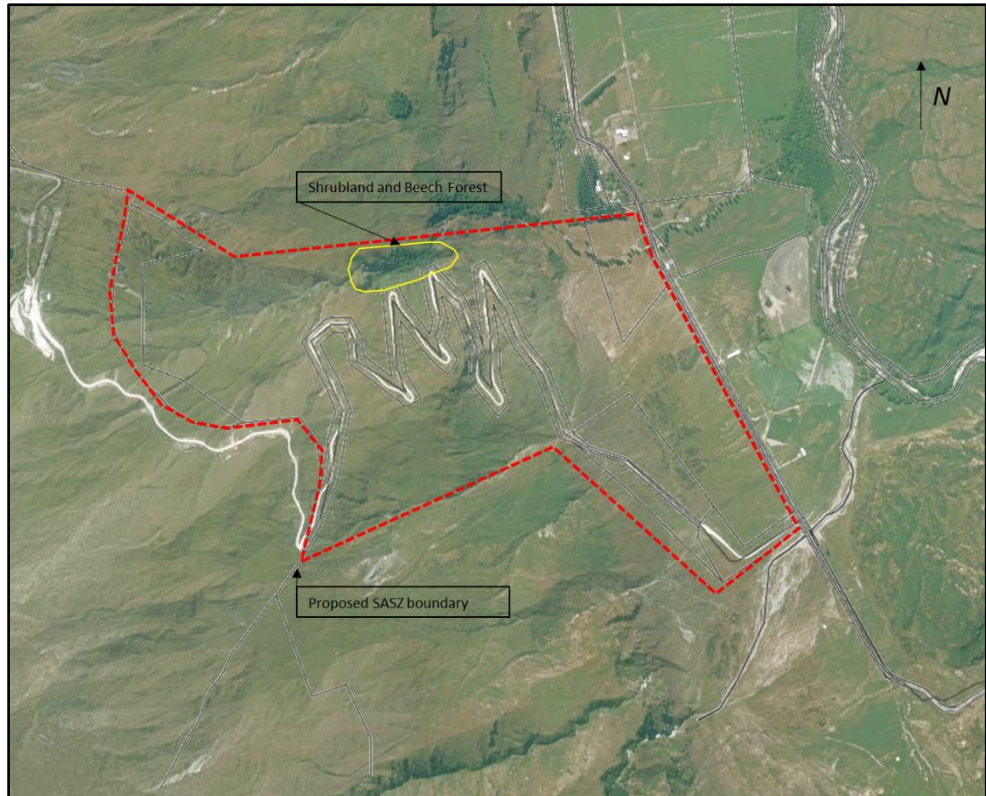


Figure 5: Treble Cone SASZ request and location of shrubland and beech forest

- 6.3** With the exception of the beech forest and shrubland along the northern boundary which should be excluded, from an ecological perspective I do not oppose the proposed extension of the Treble Cone SASZ. This view is based on the rationale that most of the area has been significantly modified and largely lacks vegetation that is representative of this site. I note that the beech forest and shrubland is situated within a steep gully and is geographically separated from the proposed SASZ to the south.

6.4 It is however possible SASZ activities such as earthworks could occur at higher elevations that could disturb these communities. I therefore consider some council control on earthwork activity within the SASZ would assist in protecting this area from SASZ activities.

A handwritten signature in black ink. The signature consists of a stylized 'G' and 'D' intertwined, followed by the name 'avis' written in a cursive script.

Glenn Davis
10 March 2017