

Appendix C - A copy of the Appellant's submission and further submissions;

Submission on Queenstown Lakes Proposed District Plan 2015 - Stage 1

Clause 6 of the First Schedule, Resource Management Act 1991

To: Queenstown Lakes District Council
 By email: services@qldc.govt.nz

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1. This is a submission on the Queenstown Lakes Proposed District Plan 2015 - Stage 1 ("**Proposed Plan**").
2. I am not a person who could gain an advantage in trade competition through this submission (clause 6(4) of Part 1 of Schedule 1 of the RMA 1991)
3. The specific provisions of the proposal that my submission relates to are: Chapters 3 (Strategic Direction), Chapter 6 (Landscapes), Chapter 27 (Subdivision), Chapter 33 Indigenous Vegetation, maps 18 and 21
4. I oppose the Proposed Plan Chapters 3, 6, and 27 insofar as they relate to the block of land identified below.
5. This submission relates to the following matters and seeks to achieve the following outcomes;

Overview:

6. Allenby Farms Limited seeks to amend relevant Proposed Plan provisions to enable the most effective and efficient use of its land, taking into account the particular characteristics of its land. The land which is the subject of this submission is the northern part of the Allenby Farms property, including Mt Iron and Hidden Hills. This property is located at Hidden Hills Drive Wanaka 9305, legal description: Lot 104 DP 412843, being approximately 90 hectares total area. The particular parts of that land which are subject to this submission are identified on the plans attached in Appendices 1 – 5.
7. This land has been zoned "Rural" under the Proposed Queenstown Plan ("**PDP**"). It has the same zoning under the Operative District Plan. This land is also subject to a Significant Natural Area ("**SNA**") overlay, a Building Restriction Area ("**BRA**") overlay, an Urban Growth Boundary ("**UGB**") and an Outstanding Natural Feature ("**ONF**") boundary.
8. This submission seeks to make some minor amendments to the rules, policies and objectives for the Rural Zone to achieve a better alignment between the relevant objectives and policies of the PDP; to amend the relevant SNA and ONF boundaries to match the topographical landscape and

ecological characteristics of the land; to relocate the BRA to better reflect development potential of the land; and to extend the Large Lot Residential zone to enable long term protection of the SNA.

Identification of the Significant Natural Area (SNA) boundary:

9. This submission requests that the SNA boundary line be moved to align with the identified vegetation and topographical values of the site which have characteristics of significance requiring protection. Such characteristics include the existence of significant indigenous vegetation and significant habitats of indigenous fauna in accordance with section 6(c) of the RMA. The amendments sought to chapter 33 and Maps 18 and 21 are illustrated on the attached Map at **Appendix 1**. The relevant ecological values are detailed in the Wildlands Report in **Appendix 7**. The SNA amendments are:
 - (a) A proposed reduction of the SNA area E18C at its northern end – marked as "**SNA Reduction**"; and
 - (b) A proposed extension of the SNA at its southern end - marked "**SNA Extension**".

Amendment of the Urban Growth Boundary (UGB):

10. This submission requests that the UGB wrapping around the northern side of the Mt Iron ONF be amended. The current location of the UGB in the Proposed Plan is illogical in the context of the relevant UGB objectives and policies which anticipate that areas within a UGB might not be suitable for development for landscape or ecological reasons.
11. This submission requests that the UGB be relocated in order to give effect to the relevant objectives and policies of urban growth by moving the UGB from the northern side (aligned with the LLR zone) to the southern side of Mt Iron.
12. This submission also requests relocation of the UGB adjoining the Hikuwai Conservation Area for similar reasons.
13. The Map attached at **Appendix 2** shows the current and proposed UGB locations.

Amendment of the Outstanding Natural Feature boundary:

14. This submission requests that the location of the ONF boundary be reassessed in light of the obvious topography of the area and indigenous vegetation cover of the outstanding feature which is Mt Iron. In particular, some areas of Mt Iron which include development are clearly on the Mt Iron ONF and are nestled into prominent indigenous vegetation, so they still contribute to the characteristics of the ONF. Parts of this development are already located within the ONF. The ONF boundary should encompass all these areas. Other parts at the foot of Mt Iron, which do not demonstrate the ONF characteristics, should be excluded from the ONF.

15. The lower foothills of Mt Iron cannot reasonably be separated in terms of character or naturalness from the higher slopes of Mt Iron. The ONF boundary should be located in a logical manner so as to delineate the outstanding vegetated slopes of Mt Iron from the lower modified urban and pasture areas. The map attached at **Appendix 3** shows the current and proposed ONF boundary.

Relocation of the Building Restriction Area (BRA)

This submission requests that the existing BRA adjoining State Highway 6 be removed, and a new BRA be created, for the following reasons:

16. There appears to be no justification as to the placement of the existing BRA in this particular area. Its history and its origins are unknown, and its purpose in the PDP does not appear to be justified in terms of the section 32 (1)(b)(i) requirement for the identification of other reasonably practicable options for achieving the objectives.
17. This BRA does not protect the 'entry to Wanaka' as the entry to Wanaka is now clearly identified by the "Wanaka" entry sign and Puzzling World. Many houses are visible above the existing BRA upon entry into Wanaka.
18. A new BRA is proposed, covering the visually sensitive land located west of and below the SNA and above the adjoining residential zone to the west. It is proposed that BRA extend northwards to the boundary of the proposed Large Lot Residential Extension referred to below.
19. The Map attached at **Appendix 4** shows the current BRA and the proposed BRA.

Large Lot residential (LLR) Extension

20. This submission requests an extension of the LLR zone ("**LLR Extension**") to include part of the site as shown on the attached Map at **Appendix 5**.
21. This submission proposes particular rules and restrictions within this LLR Extension to form a subzone of the LLR in order to ensure ongoing permanent management of the SNA. Such provisions include the protection of significant ecological values and habitats, and future development restrictions.

I seek the following decision from the local authority: that the Proposed Plan be amended as requested in the Table below, together with any alternative, additional, or consequential relief necessary or appropriate to give effect to the matters raised in this submission and/ or the relief requested below.

| Provision | Support/ Oppose | Reason | Decision sought [New text shown as <i>underlined italics</i> and deleted text shown as <i>italics strike through</i>] |
|--|--------------------|--|---|
| Chapter 3 – Strategic Direction | | | |
| Objective 3.2.5.1 Protect the natural character of Outstanding Natural Landscapes and Outstanding Natural Features from subdivision, use and development. | Support in part | The wording in this objective should be amended to better reflect RMA purpose and terminology. Protection of natural character should be considered in light of sustainable management of resources | 1. Amend Objective 3.2.5.1 as follows. Protect the natural character of Outstanding Natural Landscapes and Outstanding Natural Features from <i>inappropriate</i> subdivision, use and development. |
| Objective 3.2.5.2 Minimise the adverse landscape effects of subdivision, use or development in specified Rural Landscapes. | Support in part | The wording in this objective detracts should be amended to better reflect RMA purpose and terminology. The wording in particular is unclear and does not allow for appropriate development | 1. Amend Objective 3.2.5.2 as follows. Minimise Avoid, remedy or mitigate the adverse effects on natural landscapes effects of from <i>inappropriate</i> subdivision, use or development in specified Rural Landscapes. |
| Chapter Landscapes 6 | | | |
| Policy 6.3.1.3 That subdivision and development proposals located within the Outstanding Natural Landscape, or an Outstanding Natural Feature, be assessed against the assessment matters in provisions 21.7.1 and 21.7.3 because subdivision and | Oppose | This Policy is inherently contradictory and provides an unduly restrictive approach to future development in these areas. The Policy contradicts itself as it states that development should be considered in light of relevant provisions, but then predetermines that consideration by the last sentence stating that development will be inappropriate in almost all locations. There is no s32 justification for this stringent provision. | 1. Amend Policy 6.3.1.3 as follows. That subdivision and development proposals located within the Outstanding Natural Landscape, or an Outstanding Natural Feature, be assessed against the assessment matters in provisions 21.7.1 and 21.7.3. because subdivision and development is inappropriate in almost all locations, meaning successful applications will be exceptional cases. |

| Provision | Support/ Oppose | Reason | Decision sought [New text shown as <i>underlined italics</i> and deleted text shown as <i>italics-strike through</i>] |
|--|--------------------|---|--|
| development is inappropriate in almost all locations, meaning successful applications will be exceptional cases. | | | |
| <p>Policy 6.3.1.11 Recognise the importance of protecting the landscape character and visual amenity values, particularly as viewed from public places.</p> | Oppose | The wording in this Policy should be amended to better reflect RMA purpose and terminology. This policy sets a higher threshold of protection than provided for in section 6 without justification in the section 32 report. | <p>1. Amend Policy 6.3.1.11 as follows.</p> <p>Recognise the importance of protecting <u>avoiding, remedying, or mitigating adverse effects on</u> landscape character and visual amenity values, particularly as viewed from public places.</p> |
| <p>33 Indigenous Vegetation and Biodiversity</p> <p>And Map 18</p> | | | |
| <p>33.8.1 Significant Natural Areas</p> <p>E18C 8, 18 SNA C Mt Iron Kanuka woodland.</p> | Oppose | <p>E18C 8, 18 SNA C Mt Iron Kanuka woodland.</p> <p>This submission seeks that the boundary of the SNA identified above be moved to align with the identified vegetation and topography of the site which has characteristics of significance requiring protection. Such characteristics include the existence of significant indigenous vegetation and significant habitats of indigenous fauna in accordance with section 6(c) of the RMA.</p> <p>The map (attached Appendix 1) sets out the following proposed changes to the SNA:</p> | <p>1. Amend Chapter 33 as follows:</p> <p>Amend SNA area E18C as shown on the Map (attached Appendix 1)</p> <p>2. Amend Map 18 as follows:</p> <p>Amend SNA area E18C as shown on the Map (attached Appendix 1)</p> |

| Provision | Support/ Oppose | Reason | Decision sought [New text shown as <i>underlined italics</i> and deleted text shown as <i>italics through</i>] |
|-----------------------|--------------------|---|---|
| | | <ul style="list-style-type: none"> • A proposed reduction of the SNA at the SNA northern end – ("SNA Reduction"); • A proposed extension of the SNA at its southern end ("SNA Extension"). This increased area is the southwest face of Mt Iron. <p>The SNA Extension, and the SNA Reduction, will together result in a net increase in ecological values for this area. The SNA Extension is of roughly the same size as the SNA Reduction but contains higher ecological values. For the reasons proposed in the Wildlands Report (attached in Appendix 7) the SNA "E18C" in the PDP should be amended as proposed on the maps contained within that report at pages 15 and 16.</p> <p>This submission specifically does not seek partial grant of relief. The SNA Extension and SNA Reduction are proposed to work in tandem. The ecological significance of this area is best served by this particular boundary adjustment. This submission specifically provides that, if the SNA Reduction is not approved, the SNA Extension is withdrawn. These amendments to the SNA are linked to the Large Lot Residential ("LLR") rezoning proposal addressed below.</p> | |
| Maps 18 and 21 | Oppose | <p>Maps 18 and 21 of the PDP shows the UGB wrapping around the Mt Iron ONF on its eastern, northern and western boundaries. However its location on the northern boundary is actually part way up the slopes of Mt Iron and appears to coincide with the LLR zone boundary above Aubrey Road.</p> <p>The location of the northern UGB on the Mt Iron ONF is illogical in the context of the relevant UGB objectives and policies which anticipate that areas within a UGB might not be suitable for development for landscape or ecological reasons. (For example objective 4.2.2.4)</p> <p>This submission seeks the relocation of the UGB to around the southern side of Mt Iron, and that the UGB part way up the northern side of Mt Iron</p> | <p>1. Amend Maps 18 and 21 by;</p> <p>Removing the UGB from the northern slopes of Mt Iron and relocating this on the southern edge of the ONF.</p> <p>Relocating the UGB which currently runs along Gunn Road and around the southern side of the Hikuwai Conservation Area so it runs parallel to the river (thereby including the Hikuwai Conservation Area within the UGB).</p> |

| Provision | Support/ Oppose | Reason | Decision sought [New text shown as <i>underlined italics</i> and deleted text shown as <i>italics strike through</i>] |
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| | | <p>be removed.</p> <p>In order to create a consistent approach, the UGB which currently runs along Gunn Road and around the southern side of the Hikuwai Conservation Area should also be relocated so it runs parallel to the river (thereby including the Hikuwai Conservation Area within the UGB).</p> <p>A map showing the current and proposed boundaries of the UGB is attached at Appendix 2.</p> | <p>The attached map at Appendix 2 shows these proposed changes.</p> |
| <p>Map 18 and 21</p> | <p>Oppose</p> | <p>This submission seeks to achieve a more logical boundary for the Mt Iron ONF. The current boundary of the ONF does not accurately reflect the topography and vegetation significance in particular which contribute to the outstanding feature of Mt Iron.</p> <p>It is proposed that the ONF boundary is relocated northwards and downslope, so it includes much of the Hidden Hills residential development (and the other subdivision to the east of Hidden Hills) which is nestled into indigenous vegetation. These areas are appropriately characterised as part of the Mt Iron ONF.</p> <p>This existing development is located on the slopes of Mt Iron itself and therefore is part of the ONF. The foothills and lower vegetated slopes of Mt Iron cannot reasonably be separated out from the remainder of the ONF.</p> <p>The proposed boundary line should run around the foot of the cliffs and the toe of the slopes where the slope generally coincides with the bottom of the indigenous vegetation. In particular:</p> <p>(a) On the southern side the boundary is proposed to be where the indigenous vegetation stops and the pasture grass starts.</p> <p>(b) On the northern side, the boundary is proposed to be at the base of the kanuka, including the Hidden Hills house nestled into the kanuka, but excluding the Hidden Hills houses below the kanuka.</p> | <p>1. Amend Maps 18 and 21 as follows;</p> <p>Relocate the boundary of the Mt Iron ONF to run around the foot of the cliffs and the toe of the slopes where the slope generally coincides with the bottom of the indigenous vegetation, as identified on the attached map at Appendix 3.</p> |

| Provision | Support/ Oppose | Reason | Decision sought [New text shown as <i>underlined italics</i> and deleted text shown as <i>italics</i> <i>strike through</i>] |
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| | | <p>These boundary proposals are a logical relocation for the ONF as it will clearly delineate the topographical and ecological characteristics and features of Mt Iron from the adjacent modified pastures and urban development.</p> | |
| | | <p>In order to create a consistent application of ONF boundaries, it is submitted that the ONF boundary which currently runs along Gunn Road and around the southern side of the Hikuwai Conservation Area should be relocated so it runs parallel to the river (thereby excluding the Hikuwai Conservation Area from the Clutha River ONF).</p> <p>A map is attached at Appendix 3 showing the proposed relocation of the ONF boundaries.</p> | <p>Amend the ONF boundary adjoining the Hikuwai Conservation Area, as shown on the map in Appendix 3.</p> |
| <p>Maps 18 and 21</p> | <p>Oppose</p> | <p>The Building Restriction Area (BRA) adjoining State Highway 6 should be removed, for the following reasons:</p> <p>There appears to be no justification as to the placement of the BRA in this particular area. The history of its origins are unknown, and its purpose in the Proposed Plan does not appear to be justified in terms of the section 32 (1)(b)(i) requirement for the Identification of other reasonably practicable options for achieving the objectives.</p> <p>This BRA does not protect the 'entry to Wanaka' as the entry to Wanaka is now clearly identified by the "Wanaka" sign and the Puzzling World entrance. 'The 3 Parks Zone' provides for commercial and/or residential development on the two private properties south of the highway and west of that entrance. Many houses are visible above the BRA upon entry into Wanaka.</p> <p>The green strip subject to the building restriction is potentially capable of future development and is already significantly affected by existing and proposed developments. The restriction created by the BRA does not</p> | <ol style="list-style-type: none"> 1. Amend Maps 18 and 21 to remove the current BRA adjoining State Highway 6 2. Amend Map 21 to create a new BRA over the land located west of and below the SNA E18C and above the adjoining residential zone to the west. (Illustrated on the Map attached at Appendix 4). |

| Provision | Support/ Oppose | Reason | Decision sought [New text shown as <i>underlined italics</i> and deleted text shown as <i>italics strike through</i>] |
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| | | <p>achieve the most efficient and effective use of this resource in terms of sustainable management.</p> <p>It is also proposed that the following area be rezoned as a new BRA: land located west of and below the SNA E18C and above the adjoining residential zone to the west. That BRA will extend northwards to the boundary of the proposed LLR Extension referred to below.</p> <p>This proposed site for a new BRA is visually sensitive and is suitable for protection from the effects of further development. The amended BRA's are illustrated on the attached map at Appendix 4.</p> | |
| <p>Maps 18 and 21</p> | | <p>It is requested that the Large Lot Residential (LLR) zone be extended as shown on the map in Appendix 5 ("LLR Extension").</p> <p>The LLR Extension is proposed to form a new Mt Iron Subzone of the LLR zone which contains specific rules. Those rules will seek to achieve the following outcomes:</p> <p>(a) A regime that ensures ongoing permanent management of the SNA, primarily control of pest plants, particularly wildings, plus some regenerative planting ("SNA Management Regime"). This will include a restriction that no development can take place within the LLR Extension until and unless the proposed SNA Management Regime is locked in place, and funded by future landowners within the LLR Extension;</p> <p>(b) Strong emphasis on protection of existing indigenous vegetation within the LLR Extension;</p> <p>(c) Discretionary control over the number of house sites. In particular that subdivision must be sensitively designed, with a minimum and maximum number of houses.</p> <p>The LLR Extension will achieve a number of the higher level objectives and</p> | <p>1. Amend Maps 18 and 21 as follows:</p> <p>Extend the LLR zone to include the area identified on the attached map at Appendix 5.</p> <p>Establish an "LLR Mt Iron Subzone" for this extended area which provides for the particular characteristics of the land, having regard to the most appropriate development levels in light of the need for protection rules for natural characteristics.</p> <p>2. Amend Chapter 11 Large Lot Residential by adding the provision detailed in Appendix 6.</p> |

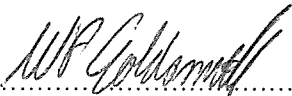
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| | | policies of the PDP. These proposed new provisions are attached at Appendix 6. | |

22. Further grounds for the submission points outlined in the above table are that:

- (a) The section 32 evaluation does not establish that the provisions of the Proposed Plan addressed in this submission are most appropriate to achieve the purpose of the RMA, and the evaluation does not adequately assess alternative provisions, such as those proposed in this submission.

23. I wish to be heard in support of my submission.

24. I will consider presenting a joint case with others presenting similar submissions.

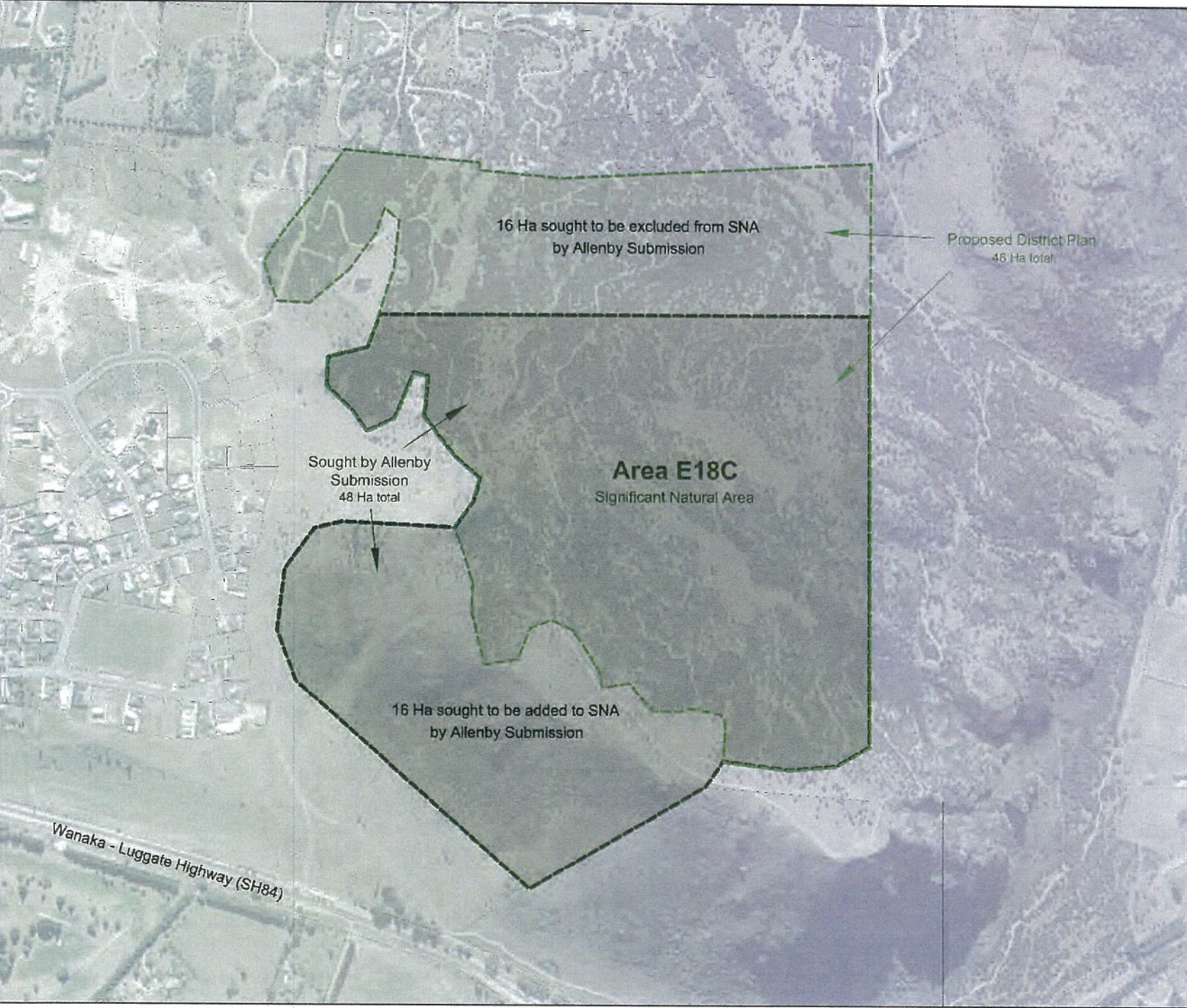
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 Allenby Farms Limited
 By its duly authorised agents
 ANDERSON LLOYD
 Per: WP Goldsmith

Address for service of Submitter:

Anderson Lloyd
 PO Box 201
 QUEENSTOWN 9348
 Tel 03 450 0700
 Fax 03 450 0799

Appendix 1: SNA Reduction and SNA Extension



Significant Natural Area (SNA)
 E18C only

Proposed District Plan - - - - -
 Sought by Allenby Submission - - - - -

Areas E18H, E18D_1 and E18D_2
 not sought to be changed by Allenby Submission

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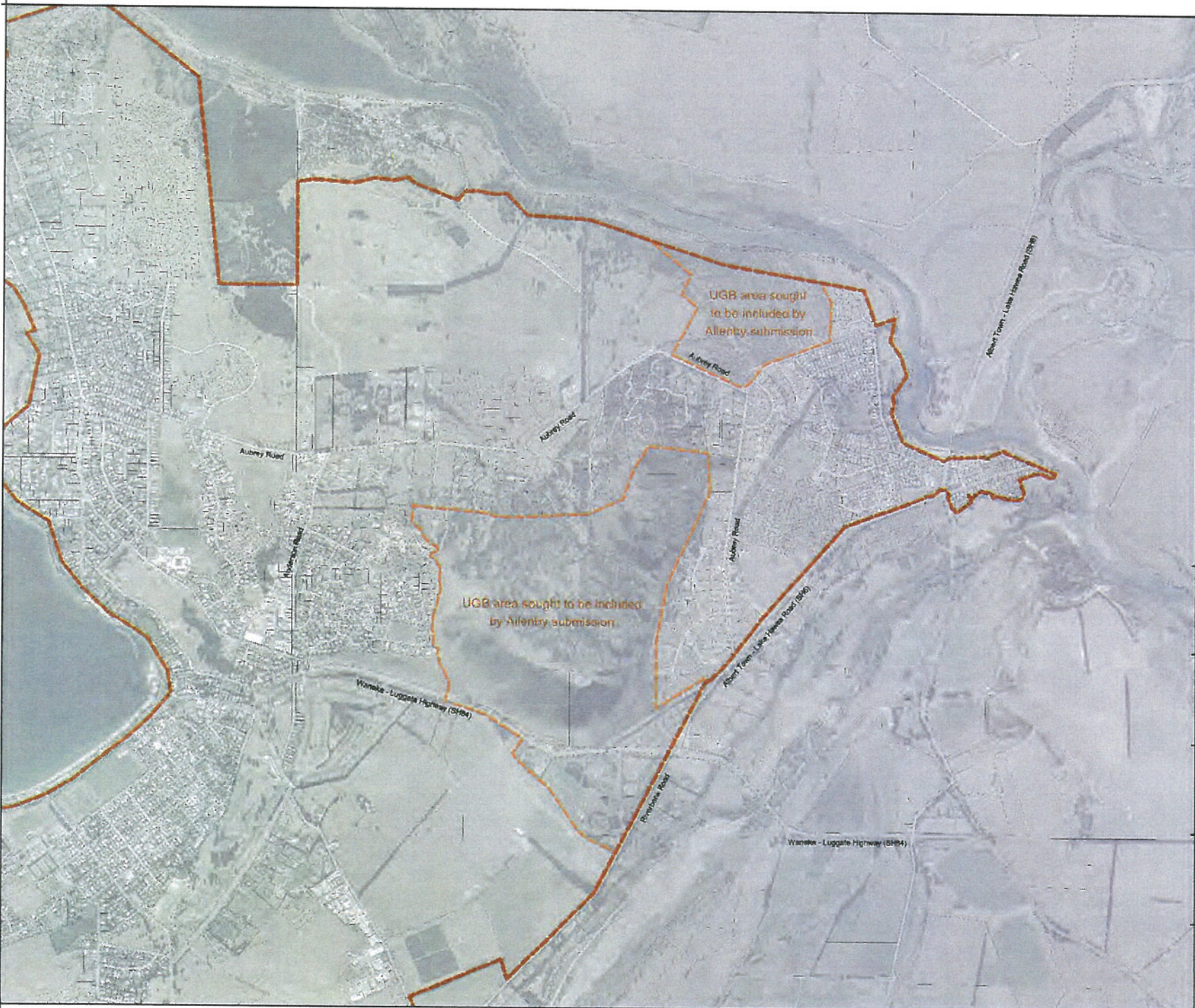
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Purpose & Drawing Title:
**Allenby Submission for
 District Plan Review
 Significant Natural Area**

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| Approved by: SW | DO NOT SCALE | |
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Appendix 2: Amended Urban Growth Boundary



Urban Growth Boundary (UGB)

Proposed District Plan

Sought by Allenby Submission

UGB area sought to be included by Allenby submission

UGB area sought to be included by Allenby submission

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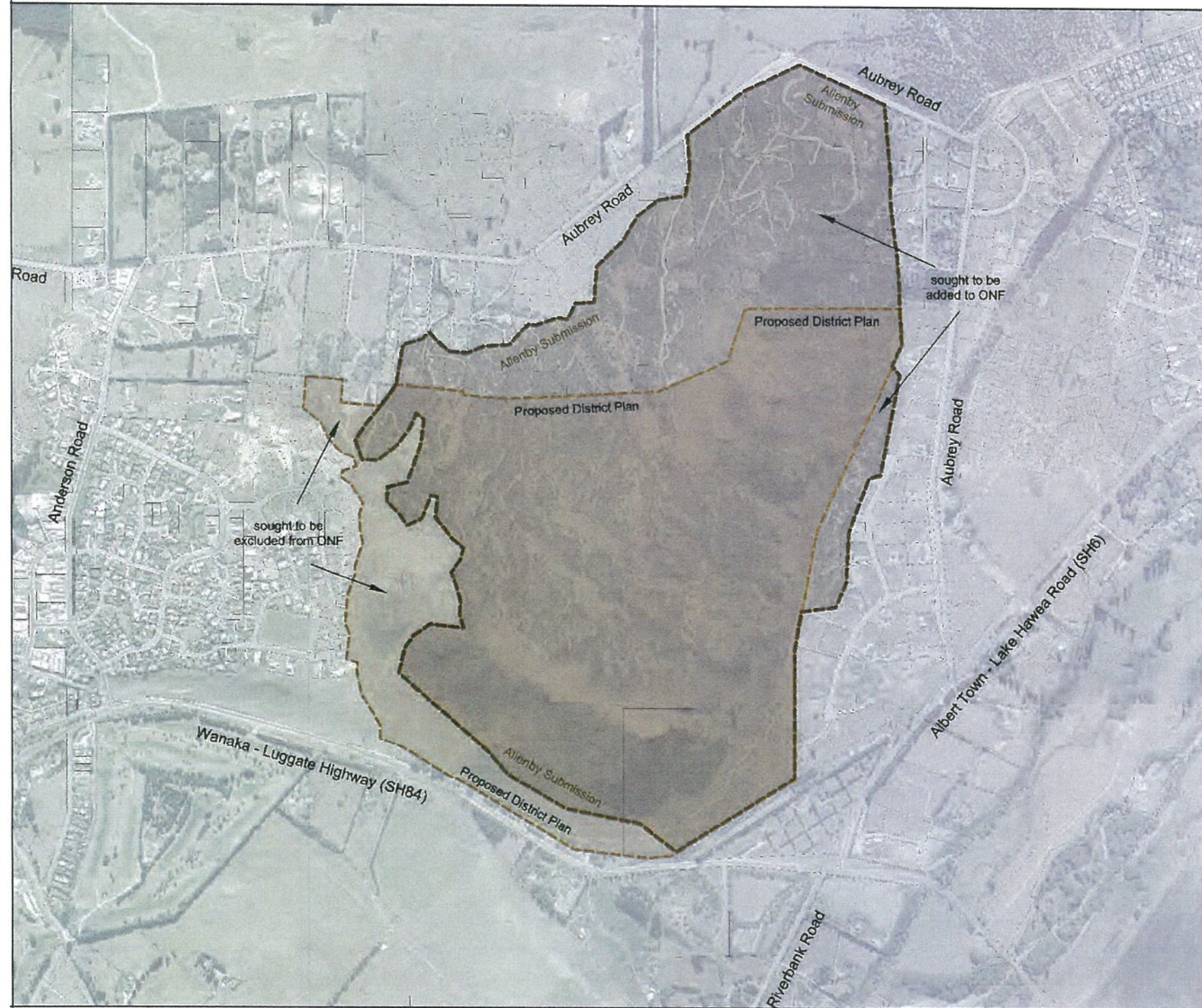
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Wanaka**

Purpose & Drawing Title:

**Allenby Submission for
District Plan Review
Urban Growth Boundary**

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| | | Date Created: | 20/10/2015 | | |

Appendix 3: Amended ONF boundary



Outstanding Natural Feature (ONF)

Proposed District Plan - - - - -

Sought by Allenby Submission - - - - -

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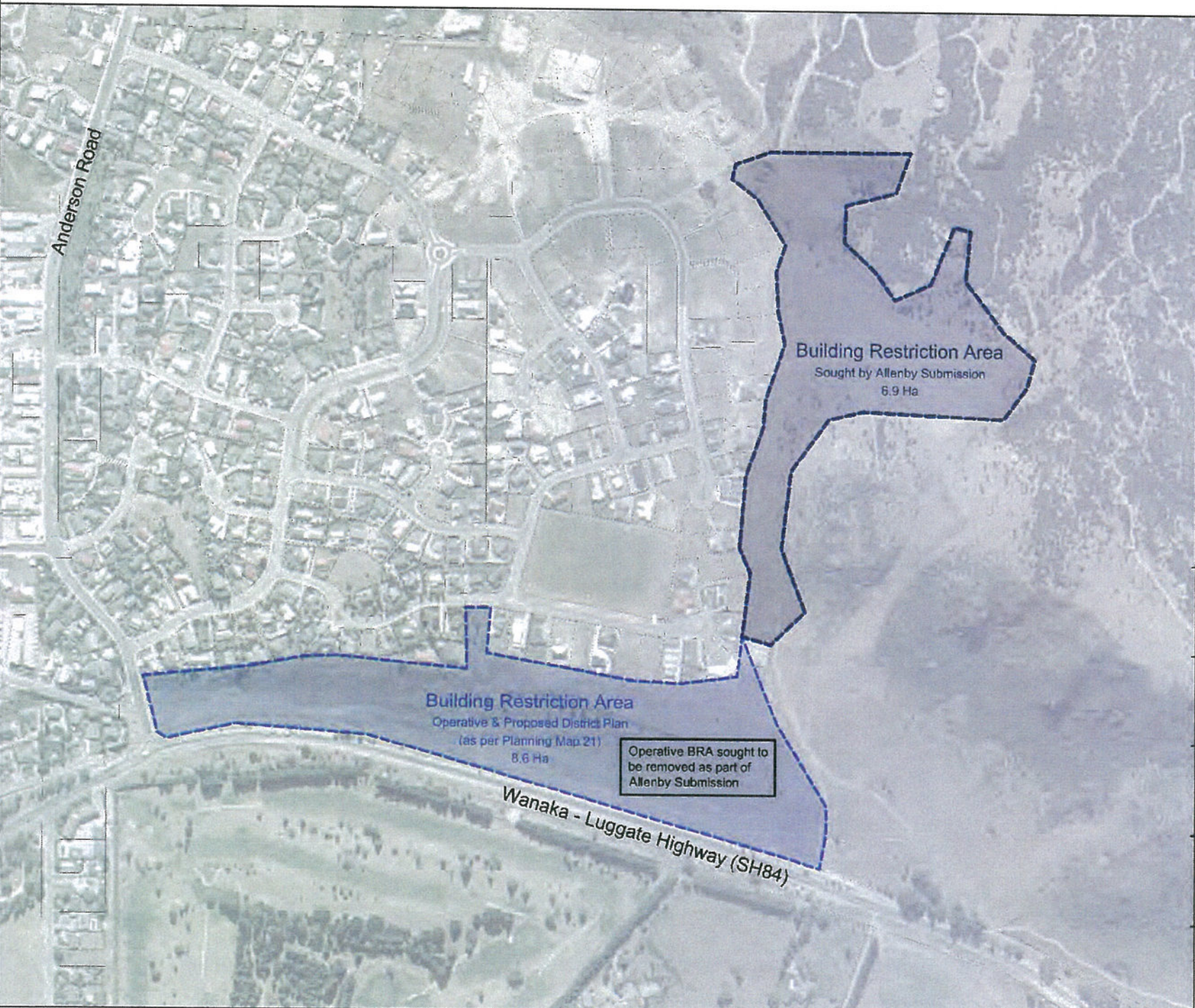
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Purpose & Drawing Title:
**Allenby Submission for
 District Plan Review
 Outstanding Natural Feature**

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| | 20/10/2015 | |

Appendix 4: Amended Building Restriction Areas



Building Restriction Area (BRA)
 Operative & Proposed District Plan - - - - -
 Sought by Allenby Submission - - - - -

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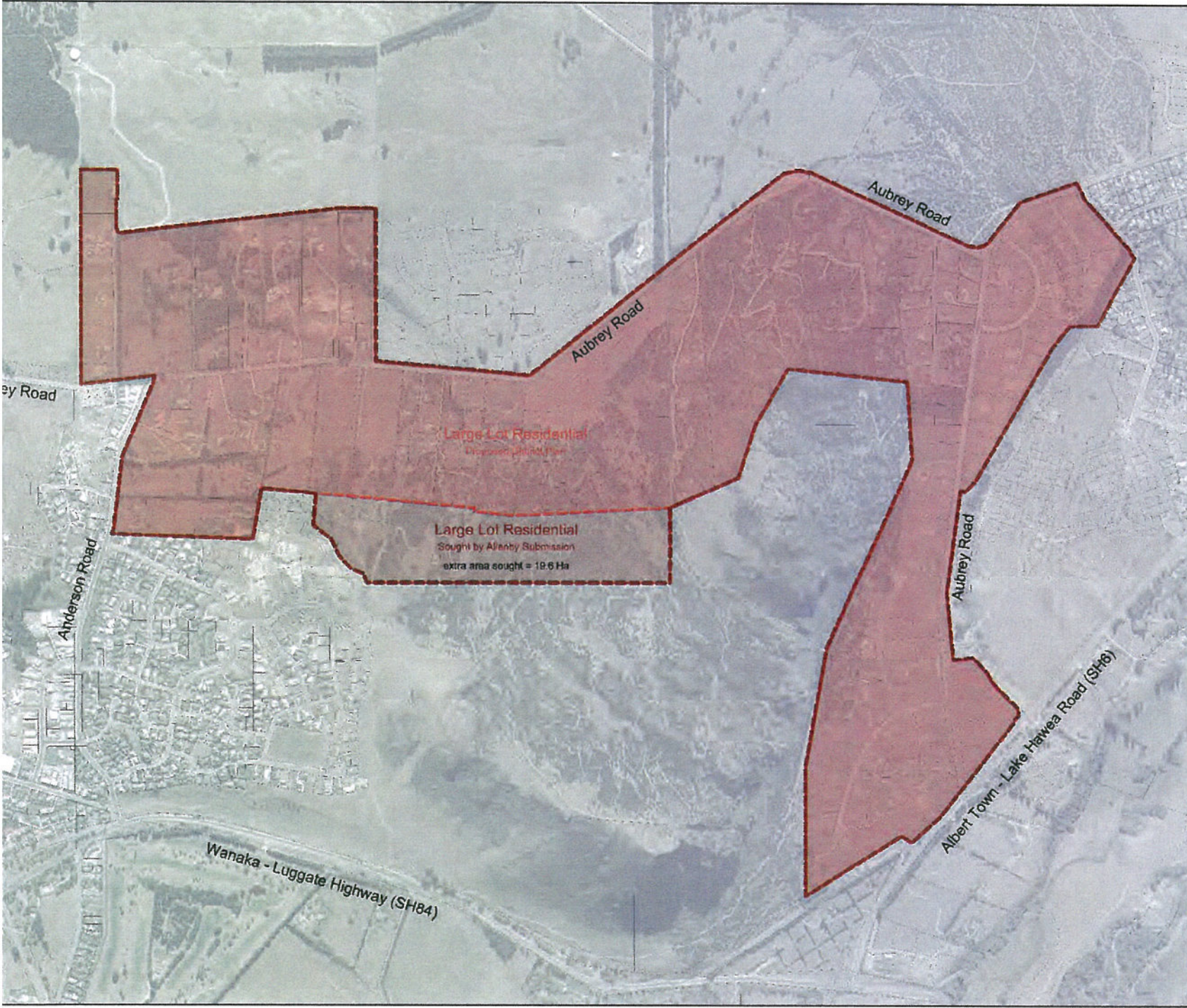
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Allenby Submission for District Plan Review
Building Restriction Area

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Appendix 5: LLR Extension



Large Lot Residential (LLR)

Proposed District Plan

Sought by Allenby Submission

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Client Location:

**Allenby Farms Ltd.
 Wanaka**

Purpose & Context:

**Allenby Submission for
 District Plan Review
 Large Lot Residential**

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Appendix 6: Proposed LLR Mt Iron Subzone Plan Provisions

Insert new sub-section:

Large Lot Residential – Mt Iron Subzone**Section 27.7 Location-specific objectives, policies and provisions****Objective**

27.7.XX Large Lot Residential Mt Iron Subzone
To provide for limited large lot residential development while providing ongoing permanent protection and management for indigenous vegetation and maintain the landscape character, visual amenity and nature conservation values of Mt Iron.

Policies

- 27.7.XX.1 Ensure that before any subdivision or development within the Large Lot Residential Mt Iron Subzone, a management regime for SNA E18C has been approved and secured. The management regime shall provide for the permanent management of SNA E18C to retain its ecological values, primarily the control of pest plants(particularly wilding species) and some regenerative plantings.
- 27.7.XX.2 To enable a sensitively designed subdivision to a minimum of 10 lots and a maximum of 15 lots to fund the ongoing costs of the management regime for SNA E18C.
- 27.7.XX.3 Maintain and enhance indigenous vegetation and ecosystems outside building areas.
- 27.7.XX.4 Appropriately locate building accesses and infrastructure to protect landscape character and visual amenity values and create an imperceptible transition into the adjacent Rural zone to the south.
- 27.7.XX.5 Respect the natural topography and minimise the need for extensive cut and fill.

Rules

[Appropriate rules to implement the policies detailed above]

Appendix 7: Wildlands Report

EVALUATION OF A POTENTIAL SIGNIFICANT NATURAL AREA AT MT IRON, WANAKA



providing
outstanding
ecological
services to
sustain
and improve our
environments



R3762



EVALUATION OF A POTENTIAL SIGNIFICANT NATURAL AREA AT MT IRON, WANAKA



Coprosma shrubland on the south-west faces of the Allenby Farms site.

Contract Report No. 3762

September 2015

Project Team:

Kelvin Lloyd - Report author
Richard Gillies - Report author

Prepared for:

Allenby Farms Ltd
P.O. Box 196
Wanaka 9343

CONTENTS

| | | |
|------|--|----|
| 1. | INTRODUCTION | 1 |
| 2. | METHODS | 1 |
| 3. | SITE CONTEXT | 1 |
| 4. | INDIGENOUS VEGETATION AND HABITATS | 2 |
| 4.1 | Kānuka scrub and shrubland | 2 |
| 4.2 | Coprosma scrub and shrubland | 5 |
| 4.3 | Exotic grassland | 7 |
| 4.4 | Swale turf | 7 |
| 4.5 | Cushionfield | 7 |
| 5. | FLORA | 8 |
| 6. | BIRDS | 8 |
| 7. | LIZARDS | 9 |
| 7.1 | Lizards known to be present on Mt Iron, outside the site | 9 |
| 7.2 | Lizards found on Mt Iron, outside the SNA boundary | 9 |
| 8. | PEST ANIMALS | 10 |
| 9. | ECOLOGICAL VALUES | 10 |
| 9.1 | Significance summary | 12 |
| 10. | DELINEATION OF THE SIGNIFICANT AREA | 13 |
| 10.1 | Proposed SNA | 13 |
| 10.2 | Alternate SNA | 13 |
| 11. | MANAGEMENT OPTIONS | 13 |
| 11.1 | Weed control | 13 |
| 11.2 | Rabbit control | 13 |
| 11.3 | Planting to increase biodiversity across the wider site | 14 |
| 12. | CONCLUSIONS | 17 |
| | ACKNOWLEDGMENTS | 17 |
| | REFERENCES | 17 |
| | APPENDIX: | |
| 1. | Vascular plant species recorded during the field survey | 18 |

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1. INTRODUCTION

Allenby Farms Ltd owns a parcel of land on the south-western side of Mt Iron, Wanaka, and is considering future development of the site. Allenby Farms is concerned that current and future developments on the property will be constrained by proposed significant natural area (SNA) status and policy relating to SNAs in the proposed Queenstown Lakes District Plan. Allenby Farms will submit that an alternative SNA location should be considered (Figure 1). In order to inform an Allenby Farms submission, the client has commissioned an independent review of the proposed and alternate SNAs, from Wildland Consultants Ltd. This report comprises an independent assessment and review based on a site visit and evaluation of other existing relevant information.

2. METHODS

Relevant information on the site was reviewed, followed by a site visit on 17 September 2015. During the three hour site visit, a range of habitats were traversed, including shrubland on the terrace scarp above State Highway 84, steep shrubland on the southern side of the site, extensive kānuka scrub and shrubland on the northern slopes of the site, areas of indigenous herbfield on exposed, dry ridge crests, and turf vegetation in swales on the northern slopes.

Vascular plants observed during the site visit were recorded, but due to the early spring season, many deciduous species were not in leaf, most species were not flowering, and summer-green species - such as orchids and annual herbs and grasses - would not have been observed. Birds observed during the site visit were also recorded.

Herpetofauna values (lizards and frogs) were assessed using existing information, including records of lizards in the the national herpetofauna database.

3. SITE CONTEXT

Mount Iron comprises a 'roche moutonnée' landform, surrounded by glacial outwash gravels, caused by glacial ice flowing from the north, which smoothed the north-eastern slopes and steepened the south-western slopes. The site rises from approximately 320 m above sea level (a.s.l.) above State Highway 84, to approximately 540 m a.s.l near the summit (548 m a.s.l) of Mount Iron within the Mt Iron Scenic Reserve.

The site lies in the Pisa Ecological District, but is very close to the boundary of the Lindis Ecological District. Both of these Districts lie in the Central Otago Ecological Region. The Pisa Ecological District has a generally dry sub-continental climate with prevailing north-west winds, and an annual rainfall of 380-1,500 mm that varies over a strong altitudinal gradient (McEwen 1987).

The Mount Iron site can be accessed from State Highway 84 or Aubrey Road, Wanaka (Figure 1). Residential housing development has occurred in the north-western part of the site, where residential areas are embedded in kānuka (*Kunzea serotina*) scrub and shrubland, which appears to have developed into the dominant vegetation cover following historic fire. Mt Iron Scenic Reserve bounds the site to the south and east (Figure 1). A number of small conservation areas occur on the margins of the Cardrona River and Clutha River near Mt Iron, and larger areas of conservation land are present on the surrounding Criffel and Pisa ranges and in the Roys Peak area.

The site is well-used for public recreation, with a major walking track from State Highway 84 to the summit of Mt Iron passing mostly through the Allenby Farms property, and extensive use of the northern part of the site (within kānuka scrub and shrubland) for walking and mountain-biking.

4. INDIGENOUS VEGETATION AND HABITATS

4.1 Kānuka scrub and shrubland

Dense areas of kānuka form a closed-canopy scrub approximately 4-5 m tall, with bare ground and litter underneath, or sometimes with bryophyte mats (Plate 1). Occasional *Coprosma crassifolia* shrubs are also present. In more open kānuka shrubland stands, matagouri (*Discaria toumatou*), *Coprosma crassifolia*, and sweet brier (*Rosa rubiginosa*) are common, and patches of exotic grassland and herbfield are present. Occasional schist rock outcrops occur within the kānuka scrub and shrubland, and these provide refuge for indigenous plant species such as blue tussock (*Poa colensoi*), *Asplenium flabellatum*, *Carex breviculmis*, *Asplenium richardii*, and *Luzula banksii* var. *rhadina* (Plate 2).



Plate 1: Ground layer dominated by bryophytes beneath kānuka scrub.

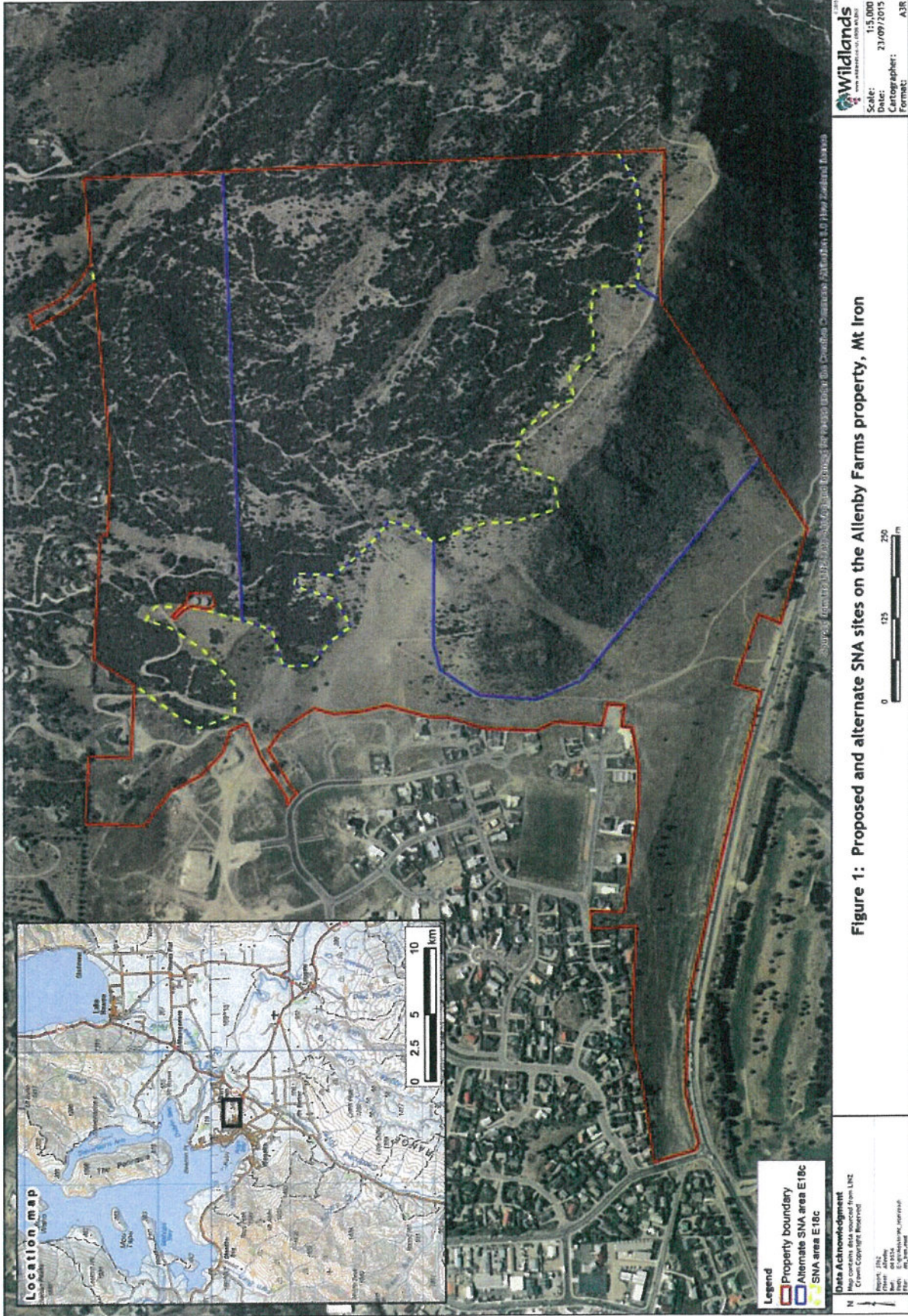




Plate 2: Rock outcrop in kānuka scrub, providing habitat for indigenous ferns, grasses, and woodrushes.

4.2 Coprosma scrub and shrubland

The steep south-west facing slopes above State Highway 84 are mostly covered in coprosma-dominant scrub and shrubland in which *Coprosma crassifolia* and mingimingi (*C. propinqua*) are dominant (Plate 3). Large schist outcrops and boulderfields on colluvial slopes are a feature of this habitat (Plate 4). Other prominent woody species include matagouri, and the exotic species Khasia berry (*Cotoneaster simsonii*), gooseberry (*Ribes uva-crispa*), St Lucie cherry (*Prunus mahaleb*), and cherry plum (*P. cerasifera*). Scattered kānuka is emergent above the shrub canopy in places, and a few ti kouka/cabbage tree (*Cordyline australis*) and kapuka/broadleaf (*Griselinia littoralis*) trees are also emergent. Occasional saplings of Corsican pine (*Pinus nigra* subsp. *nigra*) and Douglas fir (*Pseudotsuga menziesii*) are also present, but larger trees have been controlled previously by felling. On the lower slopes, shrubland vegetation is present within a matrix of exotic grassland. Part way up the slope, bracken fernland occupies gaps between shrubs (Plate 4). One effect of this dense bracken matrix is to reduce browsing by rabbits (*Oryctolagus cuniculus*) which have closely grazed the grassland and partially ringbarked shrubs on the lower slopes. Palatable broadleaf seedlings were only seen on the steeper upper slopes where bracken is abundant, and browse damage on shrub bark was much less apparent in these areas. A range of indigenous ferns are present in the ground layer and are more prominent in the area where bracken is the main species in the vegetation matrix. These ferns include *Polystichum neozelandicum*, *Asplenium flabellatum*, and *A. richardii*, with *A. trichomanes* on rock outcrops.



Plate 3: Coprosma scrub and shrubland on the south-west facing slopes of Mt Iron. Toeslopes shown here comprise useful planting sites for restoration of indigenous forest vegetation



Plate 4: Schist rock outcrops and boulderfields are common in coprosma scrub habitat.

4.3 Exotic grassland

Exotic grassland is principally present in the western part of the site, at low elevation above State Highway 84, and as patches on the upper north-facing slopes and in gaps in kānuka shrubland. This grassland usually comprises scattered shrubs and tussocks of kānuka, sweet brier, coprosma, and hard tussock (*Festuca novae-zelandiae*) within a matrix of closely-cropped browntop (*Agrostis capillaris*), with yarrow (*Achillea millefolium*) and nettle (*Urtica urens*) prominent at lower elevation and on western slopes. Scattered mature and regenerating kānuka and occasional sweet brier (*Rosa rubiginosa*) are present in these grassland areas (Plate 2).

4.4 Swale turf

Swales within kānuka scrub and shrubland on the northern side of the site support a closely-grazed turf of exotic grasses and indigenous herbs and sedges (Plate 5), including *Hydrocotyle novae-zelandiae*, *Acaena* aff. *rorida* (OTA 059651 Poolburn), and a species of *Carex*. The closely-cropped grass and sedge sward made identification of the species in the sward difficult. The presence of *Acaena* aff. *rorida* is significant as Mt Iron is only the third known site for this taxon, which has a high threat ranking.



Plate 5: *Acaena* aff. *rorida* (with toothed leaves) growing in turf (left).
Turf habitat of *Acaena* aff. *rorida* (right).

4.5 Cushionfield

Small areas of cushionfield vegetation occur on the upper edge of the Mt Iron summit plateau, and on a spur above the walking track in the western part of the site (Plate 6). Neither of these areas are included in the proposed SNA. The vegetation comprises scattered sweet brier above mats of *Raoulia* (*R. hookeri* subsp. *hookeri*, *R. australis*) and *Pimelia sericeovillosa* subsp. *pulvinaris* and scattered *Carex breviculmis*, patotara (*Leucopogon fraseri*), St John's wort (*Hypericum perforatum*), and Australian bidibid (*Acaena agnipila*).



Plate 6: Cushionfield vegetation on a spur above the walking track, showing cushions of *Raoulia* (foreground) and *Pimelea sericeovillosa* subsp. *pulvinaris* (rear).

5. FLORA

A total of 67 plant species were recorded during the site visit, of which 39 (58%) were indigenous and 28 (42%) exotic. As the site visit did not cover all parts of the site, these numbers of indigenous and exotic plant species will be an underestimate of the true species richness of the site. The assemblage of species (Appendix 1) does, however, give a good illustration of the environment and range of habitats at the site. In general, indigenous plant species richness increased with elevation within the site, while there was a greater variety of weeds at low elevation.

Two of the plant species observed have a national threat status (de Lange *et al.* 2013). *Acaena* aff. *rorida* (OTA 059651 Poolburn) is classified as Threatened-Nationally Critical, while *Pimelea sericeovillosa* subsp. *pulvinaris* is classified as At Risk-Declining.

6. BIRDS

Eight bird species were observed during the site visit, including four indigenous forest birds and four exotic species (Table 1). Californian quail (*Callipepla californica*) are also reported as being present (Lynden Cleugh, *pers. comm.*). The indigenous species were grey warbler/ riroriro (*Gerygone igata*), brown creeper/pipipi (*Mohoua novaeseelandiae*), fantail/ piwakawaka (*Rhipidura fuliginosa*), and silvereye/tauhou

(*Zosterops lateralis*), all of which are classified as 'Not Threatened'. Of these indigenous species, riroriro, piwakawaka, and tauhou are widespread and common and all were recorded in Wanaka in the most recent census of New Zealand birds (Robertson *et al.* 2007).

Table 1: Bird species recorded from Mt Iron during the site visit and by the landholder.

| Species | Common Name | Status |
|-------------------------------|-----------------------|----------------------------|
| <i>Callipepla californica</i> | Californian quail | Introduced and naturalised |
| <i>Emberiza citrinella</i> | Yellowhammer | Introduced and naturalised |
| <i>Fringilla coelebs</i> | Chaffinch | Introduced and naturalised |
| <i>Gerygone igata</i> | Grey warbler/riroriro | Not Threatened |
| <i>Mohoua novaeseelandiae</i> | Brown creeper/pipipi | Not Threatened |
| <i>Prunella modularis</i> | Dunnock | Introduced and naturalised |
| <i>Rhipidura fuliginosa</i> | Fantail/pikwakawaka | Not Threatened |
| <i>Turdus merula</i> | Blackbird | Introduced and naturalised |
| <i>Zosterops lateralis</i> | Silvereye/tauhou | Not Threatened |

Brown creeper/pipipi, however, has more substantial gaps in their distribution and are generally only present in areas with extensive indigenous or exotic forest and scrub. They were not recorded on Mt Iron in 1975 (Allen 1978), and were not recorded from the 10 km² grid square in which Mt Iron is located during the most recent national bird census (Robertson *et al.* 2007) thus may have colonised the site since then. Brown creeper/pipipi are more or less absent from the drier parts of Central Otago but are present in exotic forest at Queenstown and Naseby, and on both sides of Lake Hawea where there are extensive areas of indigenous forest and scrub (Robertson *et al.* 2007). Brown creeper/pipipi were observed most commonly in the coprosma scrub and shrubland, but were also observed in kānuka scrub and shrubland.

The exotic birds recorded - blackbird (*Turdus merula*), chaffinch (*Fringilla coelebs*), yellowhammer (*Emberiza citrinella*), and dunnock (*Prunella modularis*) - are all common in mixed indigenous and exotic habitat.

7. LIZARDS

7.1 Lizards known to be present on Mt Iron, outside the site

Two lizard species have been recorded on Mt Iron, just outside the study area, utilising ground and rocky outcrop habitats (Herpetofauna Database, Department of Conservation, *unpubl. data*, accessed 21 September 2015. See Figure 1). These species are Maccann's skink (*Oligosoma maccanni*), and Cromwell gecko (*Woodworthia* 'Cromwell'). Both species are likely to be present within the study area, where similar habitats occur. Both species are classified as Not Threatened (Hitchmough *et al.* 2013).

7.2 Lizards found on Mt Iron, outside the SNA boundary

A number of other lizard species have been found in the wider Wanaka and Hawea Basins and surrounding ranges, and could potentially utilise habitats within the Mt Iron site. Two of these species are classified as Threatened or At Risk (Table 2).

Table 2: Lizard species known from Mt Iron, and from the wider Wanaka area.

| Taxon | Common Name | Threat classification | Notes |
|------------------------------------|---------------------|----------------------------------|--|
| <i>Mokopirirakau</i> 'Roys Peak' | Roys Peak gecko | Threatened-Nationally Vulnerable | |
| <i>Oligosoma chloronoton</i> | Green skink | At Risk-Declining | |
| <i>Oligosoma maccanni</i> | McCann's skink | Not Threatened | Found under rocks on the ground on Mt Iron. |
| <i>Oligosoma polychroma</i> | Common skink | Not Threatened | |
| <i>Woodworthia</i> 'Central Otago' | Central Otago gecko | Not Threatened | |
| <i>Woodworthia</i> 'Cromwell' | Cromwell gecko | Not Threatened | Several geckos were found by spotlighting and daylight searches of rock outcrops near a popular foot track on Mt Iron. |
| <i>Woodworthia</i> 'Southern Alps' | Southern Alps gecko | Not Threatened | |

A lizard survey of the Allenby Farms property would be needed to determine what lizard values are present.

8. PEST ANIMALS

Possum (*Trichosurus vulpecula*) sign was observed in coprosma scrub and shrubland. Rabbit (*Oryctolagus cuniculus*) sign was abundant in most parts of the site, the exception being areas on the steep south-facing slopes where bracken was abundant. Hares (*Lepus europaeus*) will also be present. Mustelids (*Mustela* spp.), hedgehogs (*Erinaceus europaeus*), cats (*Felis catus*), rats (*Rattus rattus*), and mice (*Mus musculus*) are also likely to be present at the site.

9. ECOLOGICAL VALUES

Site values were assessed against the ecological significance criteria in Appendix 5 of the Queenstown Lakes District Plan. The criteria are grouped into four primary criteria and three 'other criteria'. These criteria are listed below, and site values were assessed against each criterion, as set out below.

Primary Criteria

A. The Ecological Values of the Area - the values of the place itself

- (i) *Representativeness - Whether the area contains one of the best examples of an indigenous vegetation type, habitat or ecological process which is typical of its Ecological District.*

There are relatively few 'roche moutonnée' landforms within the Pisa Ecological District, and the Mt Iron site, while modified from its original condition, has representative 'roche moutonnée' habitats that are some of the best examples of 'roche moutonnée' habitats within Pisa Ecological District.

- (ii) *Rarity - Whether the area supports or is important for the recovery of, an indigenous species, habitat or community of species which is rare or threatened within the Ecological District or is threatened nationally.*

The site contains two species that have national threat status: *Acaena* aff. *rorida* (Threatened-Nationally Critical) and *Pimelea sericeovillosa* subsp. *pulvinaris* (At Risk-Declining). In addition, pipipi/brown creeper are likely to be rare or uncommon within the Pisa Ecological District.

- (iii) *Diversity and Pattern - the degree of diversity exhibited by the area in vegetation habitat types, ecotones, species, ecological processes.*

The site has a moderate diversity of habitats, with a gradient from relatively moist and shady south-facing habitats across a dry, stony ridge supporting cushion plants, into dry, north-facing habitats. Species richness is moderate for both birds and plants.

- (iv) *Distinctiveness/Special ecological character - the type and range of unusual features of the area itself and the role of the area in relationship to other areas locally, regionally and nationally, including:*
- *presence of indigenous species at their distribution limit,*
 - *levels of endemism, e.g. the presence of endemic species,*
 - *supporting protected indigenous fauna for some part of their life cycle (e.g. breeding, feeding, moulting, roosting), whether on a regular or infrequent basis,*
 - *Playing a role in the life cycle of migratory indigenous fauna,*
 - *containing one of the best examples of an intact sequence, or substantial part of an intact sequence of ecological features or gradients,*
 - *supporting predominantly intact habitats with evidence of healthy natural ecosystem functioning*

The site is distinctive as a 'roche moutonnée' landform that is largely covered with indigenous vegetation and habitats. Indigenous forest birds and lizards are protected indigenous fauna which are supported by habitats at the site.

Other Criteria

- B. The Ecological Context of the Area including its relationship with its surroundings

- (v) *Size and Shape - the degree to which the size and shape of an existing area is conducive to it being, or becoming ecologically self sustaining.*

The site is relatively large and compact and thus is conducive to ecological values being self-sustained.

- (vi) *Connectivity - the extent to which the area has ecological value due to its location and functioning in relation to its surroundings. An area may be ecologically significant because of its connections to a neighbouring area, or as part of a network of areas of fauna habitat. For example an area may act as a corridor or stepping stone for movement/migration of species between or to areas of important habitat.*

The site is an important component of a network of sites in the vicinity of the upper Clutha River that support indigenous scrub and shrubland habitat.

C. *The Future Ecological Value of the Area*

- (vii) *Long Term Sustainability - the degree to which an area is likely to maintain itself, taking into consideration:*
- *extent to which criteria in paragraphs A and B above are met*
 - *degree of historic modification to the area and its surroundings which affects its future*
 - *degree of resilience of species and habitats present*
 - *the effects of current management on identified ecological values*
 - *the extent to which the area has achievable potential, with management input, for restoration of ecological values which are significant in the Ecological District.*

The site is likely to maintain itself subject to current weed control management being continued. Coprosma scrub and shrubland on the shady south-facing slopes of the site have excellent potential for ecological restoration into indigenous forest.

The fact that a particular area satisfies one or more of the above criteria does not necessarily mean the area is significant. The Council will give particular consideration to the ecological criteria in paragraphs (i) to (vii) along with any other relevant considerations in deciding whether or not an area should be included in Part I of the Appendix.

9.1 Significance summary

Overall, the site does support significant indigenous vegetation and significant habitats of indigenous fauna according to the ecological significance criteria in the Queenstown Lakes District Plan, and under Section 6(c) of the Resource Management Act (1991). A key attribute of the site is the gradient of indigenous woody vegetation from relatively moist, shady, habitat on south-facing slopes to dry, sunny habitat on north-facing slopes. The site also supports Threatened and At Risk plant species, a bird species that is uncommon in Pisa Ecological District, and is an important component of a network of indigenous forest and scrub sites in the upper Clutha River.

10. DELINEATION OF THE SIGNIFICANT AREA

10.1 Proposed SNA

A major limitation of the proposed SNA (Figures 1 and 2) is that it includes only kānuka scrub and shrubland on the sunny north-facing slopes. Thus the site does not capture any of the cushionfield vegetation that provides habitat for the At Risk *Pimelea sericeovillosa* subsp. *pulvinaris*, nor does it capture the habitat diversity and indigenous fauna habitat provided by the coprosma scrub and shrubland on the south-facing slopes.

10.2 Alternate SNA

The alternate SNA (Figures 1 and 2) captures the ecological gradient across the site, including two additional vegetation and habitat types, one of which supports the At Risk *Pimelea sericeovillosa* subsp. *pulvinaris*, and the other which provides good habitat for the locally uncommon pipipi/brown creeper. The coprosma scrub and shrubland habitat is also more likely to provide good habitat for indigenous lizards at the site. The same vegetation type provides habitat for Cromwell gecko and McCann's skink (Figure 3). Inclusion of these additional habitats is at the expense of losing some kānuka scrub and shrubland from the SNA, but kānuka scrub and shrubland remains the most extensive habitat type within the SNA, and it is a relatively common woody vegetation type in the local area. The alternate SNA has greater diversity of habitats, landforms, and species than the proposed SNA, and provides habitat for all of the Threatened, At Risk, and locally uncommon species that are known from the site. The areas (in hectares) of the proposed and alternate SNAs are practically the same.

11. MANAGEMENT OPTIONS

11.1 Weed control

It will be important to maintain control of wilding conifers that have invaded the site, mostly on south-facing slopes. The infestation of St Lucie cherry on these slopes also warrants control effort.

11.2 Rabbit control

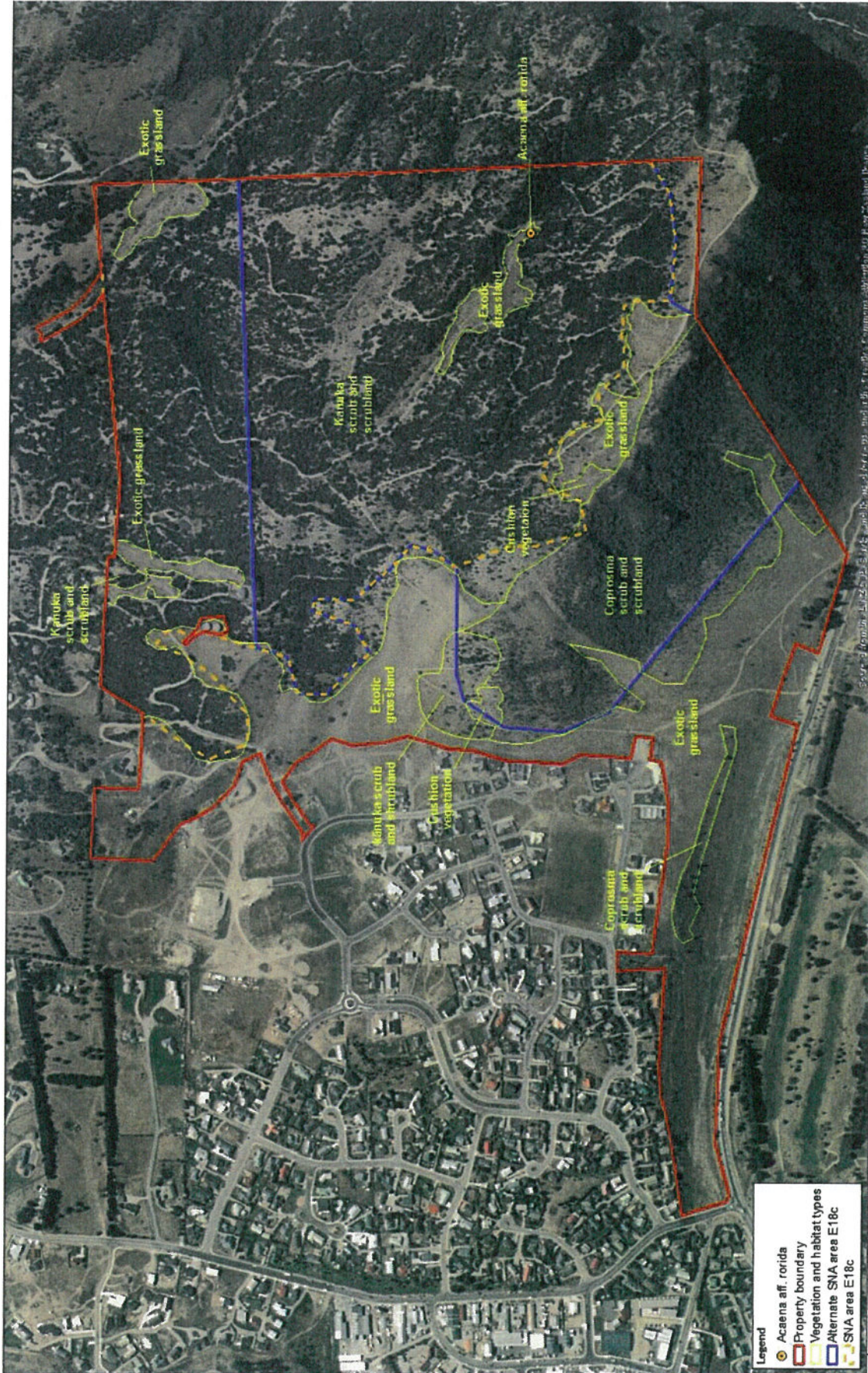
Rabbit control is important if natural colonisation by any species other than kānuka is to be fostered across the site. Rabbits and hares are typically controlled by a combination of poisoning and night shooting in rural Otago, but control options at this site may be limited by recreational use of the site and proximity to residential areas. Otago Regional Council rules require that all land occupiers maintain rabbit densities at a level below Modified McLean Scale 3. At this level, rabbit pellet heaps are 10 m or more apart, and rabbits are seen only occasionally.

11.3 Planting to increase biodiversity across the wider site

Current indigenous vegetation across the site is clearly secondary in origin, and does not represent the original vegetation of the site. A range of other indigenous tree and shrub species could therefore also be planted on the site. The focus of any planting should be on toeslopes within coprosma scrub and shrubland, where greater soil depth and soil moisture is likely. Indigenous trees that would have potentially occurred at the site, and which could be planted, include kowhai (*Sophora microphylla*), cabbage tree (*Cordyline australis*), kohuhu (*Pittosporum tenuifolium*), lowland ribbonwood (*Plagianthus regius*), matai (*Prumnopitys taxifolia*), Hall's totara (*Podocarpus laetus*), fierce lancewood (*Pseudopanax ferox*), and broadleaf (*Griselinia littoralis*) (Table 3). Kowhai, cabbage tree, Hall's totara, kohuhu, and broadleaf are naturally present elsewhere in the area, but lowland ribbonwood, matai, and fierce lancewood are species that would very likely have been present historically in appropriate habitats. Thus the Mt Iron site would provide an opportunity to reintroduce these species to a semi-natural inland Otago environment. The advantage of including a range of different species is that if some perform poorly at the site, this can be compensated for by the better performance of other species.

Table 3: Indigenous tree species suitable for planting at the Mount Iron site.

| Species | Common Name | Notes |
|--------------------------------|--------------------|--|
| <i>Cordyline australis</i> | Cabbage tree | Fast initial height growth, food source for indigenous birds, will grow in most locations within the site. |
| <i>Kunzea serotina</i> | Kānuka | Can establish in the presence of rabbit browse, tolerant of dry conditions |
| <i>Pittosporum tenuifolium</i> | Kohuhu | Moderate growth rate, hardy, will grow in most locations within the site. |
| <i>Prumnopitys taxifolia</i> | Matai | Slow-growing, long-lived, fruit source for indigenous birds when mature. Best planted in sheltered microhabitat in deeper soils. |
| <i>Pseudopanax ferox</i> | Fierce lancewood | Moderate growth rate, fruit source for indigenous birds when mature. Best planted on deeper soils. |
| <i>Griselinia littoralis</i> | Broadleaf | Hardy, exposure tolerant, will grow in most locations within the site |
| <i>Plagianthus regius</i> | Lowland ribbonwood | Fast growth on fertile soils, better planted in deeper soils. |
| <i>Podocarpus laetus</i> | Hall's totara | Slow growing but hardy, fruit source for indigenous birds when mature, will grow in most locations within the site. |
| <i>Sophora microphylla</i> | Kowhai | Slow growth, can grow on stony sites, important food source for indigenous birds. |





 Scale: 1:5,000

 Date: 29/09/2015

 Cartographer:

 Format: ADR

Figure 2: Vegetation and habitats on the Allenby Farms property, Mt Iron.

Legend

 ● Acaena aff. rorida

 ■ Property boundary

 ■ Vegetation and habitat types

 ■ Alternate SNA area E18c

 ■ SNA area E18c

Data Acknowledgement

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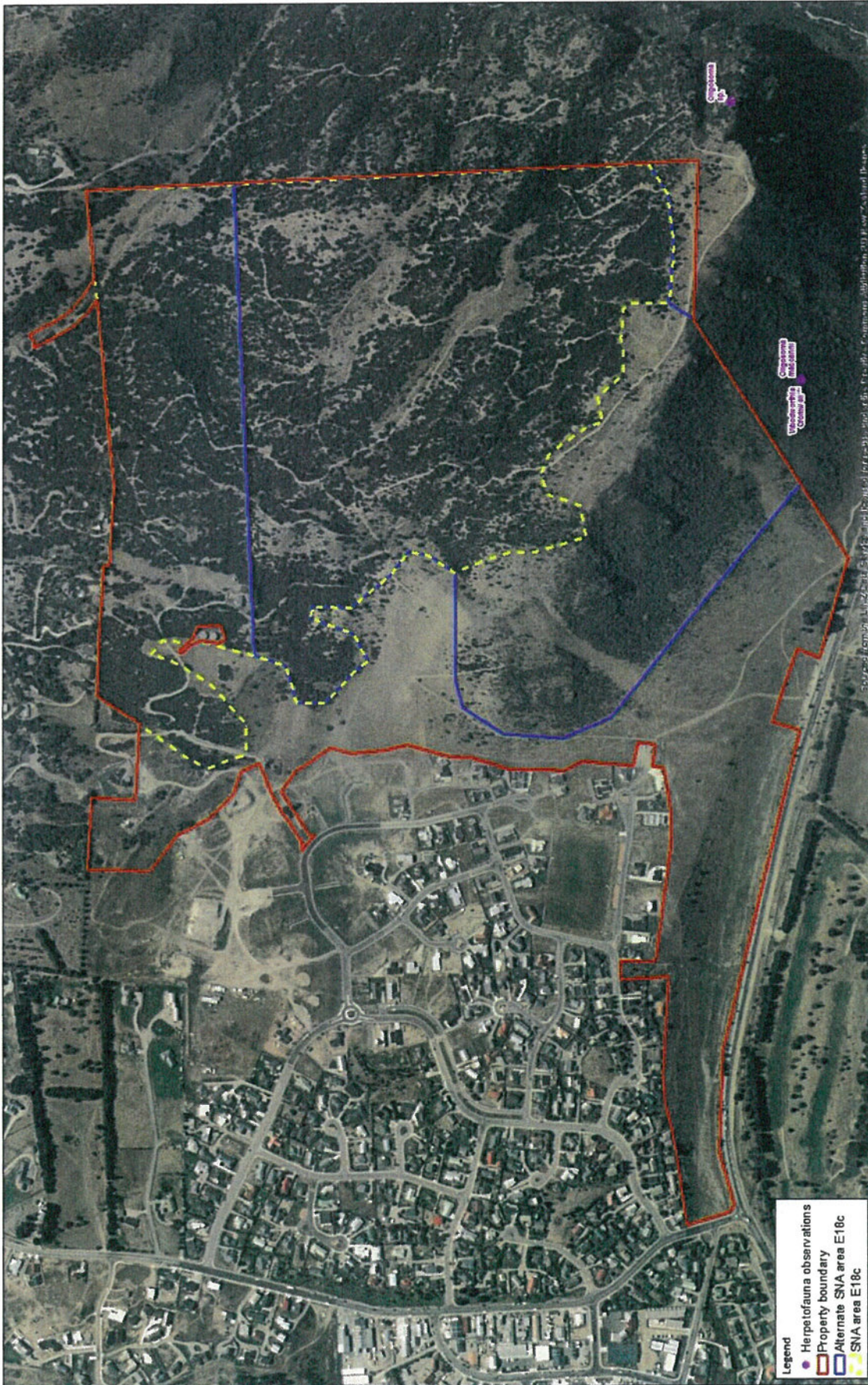
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 Report: 212

 Date: 29/09/2015

 Project: Mt Iron

 File: 290915_01.dwg




 Scale: 1:5,000
 Date: 25/09/2015
 Cartographer:
 Format: A3R

Figure 3: Herpetofauna database records near the Allenby Farms property, Mt Iron
 Source: Lembeh, Lutz, and Sauer, and updated for 2015-2016. Copyright 2015 by Wildland Consultants

Legend
 ● Herpetofauna observations
 --- Property boundary
 --- Alternate SNA area E18c
 --- SNA area E18c

Data Acknowledgement
 From Lutz
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 Project: 2015
 Date: 25/09/2015
 File: 2015-09-25-15:00

12. CONCLUSIONS

The Allenby Farms site on Mt Iron supports significant indigenous vegetation and habitats of indigenous fauna. The alternate SNA site would enable better protection of significant ecological values than does the proposed SNA, because it captures the ecological gradient across the site, and provides habitat for all three of the Threatened, At Risk, and locally uncommon species at the site. It also provides habitat for indigenous lizards, but a lizard survey would be needed to determine what lizard species are present. Management options to improve the site include rabbit control and enhancement planting.

ACKNOWLEDGMENTS

Robin Patterson (Patterson Pitts Group) provided project liaison.

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VASCULAR PLANT SPECIES RECORDED DURING THE FIELD SURVEY

Exotic species are denoted by asterisks. Abundances relate to distribution within the site.

| Species | Common Name | Plant Type | Abundance |
|---|------------------------|------------|------------|
| <i>Acaena agnipila</i> * | Australian sheeps burr | Dicot herb | Frequent |
| <i>Acaena novae-zelandiae</i> | Bidibidi | Dicot herb | Rare |
| <i>Acaena</i> aff. <i>rorida</i> (OTA 059561; Poolburn) | Bidibidi | Dicot herb | Rare |
| <i>Achillea millefolium</i> * | Yarrow | Dicot herb | Occasional |
| <i>Agrostis capillaris</i> * | Browntop | Grass | Abundant |
| <i>Anthosachne solandri</i> | | Grass | Occasional |
| <i>Anthoxanthum odoratum</i> * | Sweet vernal | Grass | Frequent |
| <i>Aphanes arvensis</i> * | Parsley piert | Dicot herb | Occasional |
| <i>Aristolelia fruticosa</i> | Shrubby wineberry | Shrub | Rare |
| <i>Asplenium flabellifolium</i> | Necklace fern | Fern | Occasional |
| <i>Asplenium richardii</i> | Richard's spleenwort | Fern | Frequent |
| <i>Asplenium trichomanes</i> | Spleenwort | Fern | Occasional |
| <i>Cardamine hirsuta</i> * | Bitter cress | Dicot herb | Occasional |
| <i>Carex breviculmis</i> | | Sedge | Rare |
| <i>Carmichaelia petriei</i> | Desert broom | Shrub | Occasional |
| <i>Centaurium erythraea</i> * | Centaury | Dicot herb | Occasional |
| <i>Cerastium fontanum</i> * | Mouse-ear chickweed | Dicot herb | Occasional |
| <i>Cirsium vulgare</i> * | Scotch thistle | Dicot herb | Rare |
| <i>Coprosma crassifolia</i> | | Shrub | Frequent |
| <i>Coprosma propinqua</i> | Mingimingi | Shrub | Frequent |
| <i>Cordyline australis</i> | Cabbage tree/ti kouka | Tree | Rare |
| <i>Cotoneaster simonsii</i> * | Khasia berry | Shrub | Occasional |
| <i>Cytisus scoparius</i> * | Scotch broom | Shrub | Occasional |
| <i>Discaria toumatou</i> | Matagouri | Tree | Frequent |
| <i>Epilobium alsinoides</i> | | Dicot herb | Occasional |
| <i>Epilobium cinereum</i> * | Willow herb | Dicot herb | Occasional |
| <i>Erophila verna</i> * | Whitlow grass | Dicot herb | Rare |
| <i>Euchiton audax</i> | Native cudweed | Dicot herb | Occasional |
| <i>Festuca novae-zelandiae</i> | Hard tussock | Grass | Occasional |
| <i>Geranium microphyllum</i> | Geranium | Dicot herb | Occasional |
| <i>Griselinia littoralis</i> | Broadleaf | Tree | Occasional |
| <i>Hieracium lepidulum</i> * | Tussock hawkweed | Dicot herb | Rare |
| <i>Hydrocotyle novae-zeelandiae</i> | | Dicot herb | Rare |
| <i>Hypericum perforatum</i> * | St Johns wort | Dicot herb | Rare |
| <i>Hypochaeris radicata</i> * | Catsear | Dicot herb | Rare |
| <i>Juncus edgariae</i> | Hard rush | Rush | Rare |
| <i>Kunzea serotina</i> | Kānuka | Tree | Abundant |
| <i>Lagenophora strangulata</i> | | Dicot herb | Rare |
| <i>Leucopogon fraseri</i> | Patotara | Shrub | Rare |
| <i>Luzula banksiana</i> | Woodrush | Rush | Occasional |
| <i>Luzula ulophylla</i> | | Rush | Occasional |
| <i>Melicytus alpinus</i> | Porcupine shrub | Shrub | Rare |
| <i>Mycelis muralis</i> * | Wall lettuce | Dicot herb | Occasional |
| <i>Olearia arborescens</i> | Common tree daisy | Tree | Rare |
| <i>Olearia odorata</i> | Scented tree daisy | Shrub | Rare |
| <i>Pimelea sericeovillosa</i> | Pillow pimelea | Shrub | Rare |
| <i>Pinus nigra</i> * | Black pine | Tree | Rare |

| Species | Common Name | Plant Type | Abundance |
|----------------------------------|-------------------|------------|------------|
| <i>Poa colensoi</i> | Blue tussock | Grass | Occasional |
| <i>Polystichum neozelandicum</i> | | Fern | Rare |
| <i>Prunus cerasifera</i> * | Cherry plum | Tree | Occasional |
| <i>Prunus mahaleb</i> * | St Lucie cherry | Tree | Occasional |
| <i>Pseudotsuga menziesii</i> * | Douglas fir | Tree | Occasional |
| <i>Pteridium esculentum</i> | Bracken | Fern | Occasional |
| <i>Raoulia australis</i> | Common mat daisy | Dicot herb | Rare |
| <i>Raoulia hookeri</i> | Scabweed | Dicot herb | Occasional |
| <i>Raoulia subsericea</i> | | Dicot herb | Occasional |
| <i>Ribes uva-crispa</i> * | Gooseberry | Shrub | Occasional |
| <i>Rosa rubiginosa</i> * | Sweet briar | Shrub | Frequent |
| <i>Rubus schmidelioides</i> | Lawyer | Vine | Occasional |
| <i>Rumex acetosella</i> * | Sheep's sorrel | Dicot herb | Occasional |
| <i>Rumex crispus</i> * | Curled dock | Dicot herb | Occasional |
| <i>Senecio quadridentatus</i> | Cotton fireweed | Dicot herb | Rare |
| <i>Taraxacum officinale</i> * | Dandelion | Dicot herb | Rare |
| <i>Trifolium arvensis</i> * | Haresfoot trefoil | Dicot herb | Rare |
| <i>Trifolium repens</i> * | White clover | Dicot herb | Rare |
| <i>Uncinia</i> sp. | Hooked sedge | Sedge | Rare |
| <i>Urtica urens</i> * | Nettle | Dicot herb | Occasional |
| <i>Veronica arvensis</i> * | Field speedwell | Dicot herb | Occasional |



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Further Submission on Queenstown Lakes Proposed District Plan 2015 - Stage 1

Clause 8 of the First Schedule, Resource Management Act 1991

To: Queenstown Lakes District Council

By email: services@qldc.govt.nz

Name of Submitter: **Allenby Farms Limited**

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1. This is a further submission in support of/ in opposition to the submissions on the Proposed District Plan – Stage 1 which are detailed in the Table below.
2. I am a person who has an interest in the proposal that is greater than the interest the general public has, because I own land potentially directly affected by matters raised in the submissions detailed in the Table below.
3. The reasons for my support of or opposition to the submissions, or specific points raised in the submissions, are specified in the Table below.

| Submission (number/name/address) | Support/ Oppose | Provision(s) | Reasons | Relief Sought |
|--|-----------------|--|---|--|
| #373 Department of Conservation PO Box 4715 Christchurch 8140 gdeavoll@doc.govt.nz | Oppose in part | Policy 3.2.4.2.2 Policy 30.2.3.6 Chapter 33, 33.1, objectives 33.2.1, 33.2.3; Policies 33.2.1.1, 33.2.1.2, 33.2.1.3, 33.2.1.4, 33.2.1.5, 33.2.1.6, 33.2.1.7, 33.2.1.8, 33.2.1.9, 33.2.2, 33.2.2.1, 33.2.2.2, 33.2.2.3, Rules 33.3.4 Table 2, 33.5.5, 33.5.7, 33.5.8, | Amendments proposed to Policy 3.2.4.2.2 and Policy 30.2.3.6 on biodiversity off-setting create confusion for the methodology of the principle and inappropriately limit the concept and application of environmental compensation. The proposed amendments to chapter 33 are not supported as these proposals will not seek to achieve the most effective and efficient use of resource under the RMA purpose of sustainable management. The changes sought are based upon | That the submission be refused insofar as the submission seeks amendments to the provisions identified for Chapter 3 (as referred to in this Further Submission) and Chapter 33 (as referred to in this Further Submission). |

| Submission (number/name/address) | Support/ Oppose | Provision(s) | Reasons | Relief Sought |
|----------------------------------|-----------------|---|---|---------------|
| | | <p>33.2.1.9</p> <p>New policies proposed for Chapter 33</p> | <p>a presumption that they are needed to give effect to Goal 3.2.3 of the Proposed Plan. This is not a sound justification as it not clear what status 'Goals' have in the Plan, and whether they must be given effect to. Any lower order provisions should give effect to the objectives of the Plan, rather than goals.</p> <p>Amendments sought to the 33.1 purpose elevate the protection of indigenous vegetation beyond a level provided for in Part 2 of the RMA, without justification by way of a section 32 analysis.</p> <p>The amendments sought by the submission do not take into account the ability for appropriate subdivision use and development to occur in areas of significant vegetation, where suitable controls can be introduced to maintain or enhance the ecological values associated with such areas.</p> <p>The proposed amendments to encourage protection and enhancement of biodiversity values on unproductive land within the district are not suitable. These would render almost all land in the District subject to such protections and would disable any future development opportunities</p> <p>Removal of all exemptions for instances of indigenous vegetation clearance where appropriate, and subject to suitable controls, will render some land incapable of future appropriate use and development.</p> | |

| Submission (number/name/address) | Support/ Oppose | Provision(s) | Reasons | Relief Sought |
|--|-----------------|---|--|---|
| | | | The amendments sought inappropriately restrict the application of the principle of environmental compensation. | |
| <p>#518 Scott Mazey Family Trust</p> <p>c/o Rough and Milne Landscape Architects PO BOX 349 Wanaka New Zealand 9343</p> | Support in part | Planning Map 18; Those provisions or parts of the submission which seek a rezoning of Large Lot Residential over part of that Submitter's property, located at the base of Mt Iron ONF. | The zoning requested in the submission 518 is potentially suitable for the land subject to this submission | <p>The submission be allowed, subject to a consistent ecological regime being applied over the remainder of the land owned by the Submitter on and adjacent to the Mt Iron ONF.</p> <p>Further conditions for support of this rezoning are that particular rules and restrictions within this LLR extension are included to ensure ongoing permanent management of that part of the SNA owned by the submitter, particularly including removal of wilding species and control of pest plants and animals. Such provisions should include the protection of significant ecological values and habitats, and future development restrictions.</p> <p>If the entire Mazey property is not able to be considered for the purposes outlined above, then the submission seeking rezoning should be disallowed</p> |

| Submission (number/name/address) | Support/ Oppose | Provision(s) | Reasons | Relief Sought |
|--|-----------------------|---|--|--|
| <p>#706 Forest and Bird NZ</p> <p>PO Box 6230 Dunedin New Zealand 9059 maturin@forestandbird.org.nz</p> | <p>Oppose in part</p> | <p>Definitions, Objective 3.2.4, 3.2.4.3, 3.2.4.5, 3.2.4.7 policies 3.2.4.2.1, 3.2.4.2.2, 3.2.4.5.1, 3.2.4.7, new policies</p> <p>Chapter 33 (all provisions identified within chapter 33). New assessment matters and other provisions proposed for chapter 33</p> | <p>Adding soil disturbance to the definition of vegetation clearance is not supported. Objectives adding 'maintenance of biodiversity' without qualification are not supported. Addition of avoidance wording to policies without qualification is not supported.</p> <p>All of the above will not provide for a sustainable management regime which anticipates a level of appropriate development within some significant indigenous vegetation (subject to appropriate controls).</p> <p>Any amendments to biodiversity offsetting principles should be clarified for consistency with case law on offsetting and to enable an environmental compensation approach.</p> | <p>That the submission be refused insofar as the submission seeks amendments to the provisions identified in this submission for Chapter3 and 33.</p> |
| <p>#145 Upper Clutha Environmental Society Inc</p> <p>245 Hawea Back Road Wanaka New Zealand 9382 uces@xtra.co.nz</p> | <p>Oppose in part</p> | <p>Chapters 3, 6, and 21 as they are referred to in this submission</p> | <p>Proposed amendments to chapters 3, 6, and 21 as these relate to subdivision or development in rural areas are opposed. Justification for the removal of policies relating to subdivision and development on highly visible slopes has been adequately assessed in Council's section 32 reports.</p> <p>Requiring the addition of these factors will not provide for an appropriate subdivision and development regime.</p> <p>The Submission does not clearly identify the source of all of these provisions which it seeks to amend in the Proposed Plan, therefore the addition of broad policies and wording across three chapters in the plan is not justified and is not</p> | <p>That the submission be refused insofar as the submission seeks amendments to the: "Rural Zone. Rural Areas Zone objectives and policies and assessment matters and rules and any provisions of the District Plan that relate to these or subdivision and/ or development of rural areas in any way"</p> |

| Submission (number/name/ address) | Support/ Oppose | Provision(s) | Reasons | Relief Sought |
|--------------------------------------|--------------------|--------------|--|---------------|
| | | | <p>supported.</p> <p>Extension of the Wakatipu Basin ONL policy regime to the entire District ONL/ONF is not warranted or appropriate.</p> | |

4. Further grounds for the submission points outlined above are that, to the extent that the submission points being opposed above are supported by a section 32 evaluation, that evaluation does not adequately support the submission points detailed in the proposal and does not adequately assess alternative provisions, such as those supported by this further submission.
5. I wish to be heard in support of my submission.
6. I will consider presenting a joint case with others presenting similar submissions.

Allenby Farms Limited

By its duly authorised agents
ANDERSON LLOYD
Per: WP Goldsmith



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