
Table of Contents

EXECUTIVE SUMMARY	2
INTRODUCTION.....	4
CODE OF CONDUCT	4
SCOPE	5
MATERIAL CONSIDERED.....	5
BACKGROUND.....	5
THE DIRECTOR-GENERAL'S SUBMISSION	7
STATUTORY CONSIDERATIONS.....	8
RESPONSE TO S42A COUNCIL OFFICER'S REPORT.....	10
CONCLUSION	15

Executive Summary

1. The D-G lodged a submission on Plan Change 18 on 9 December 2021, which opposed Plan Change 18 in part. The submission sought consideration of the cross-boundary effects of industrial activities on the Cromwell Chafer Beetle Nature Reserve which adjoins the southern boundary of the proposed industrial zone extension. Relief was sought to manage these potential adverse effects through mitigation and control measures in an amended Plan Change.
2. Council is required to address indigenous biodiversity in accordance with Part 2, Section 6(c) and Section 31 of the Act which requires the protection of significant indigenous vegetation and significant habitats of indigenous fauna and maintenance of indigenous biodiversity. The significant ecological values of the reserve are described in the evidence provided by Mr Chinn.
3. The District Plan and any plan change must give effect to the partially operative Otago Regional Policy Statement and have regard to the proposed Otago Regional Policy Statement. Based on the evidence of Mr Chinn, I consider that the Cromwell Chafer Beetle Nature Reserve would classify as being 'significant' under the significance criteria of these two Policy Statements. It is also noted that the reserve is identified in the Central Otago District Plan as having significant natural values.
4. When comparing the provisions of the current Rural Resource Area and the proposed Plan Change 18 Industrial Resource Area provisions, I consider that the zone change will allow for environmental standards to be set at a lower level with the ability for the adjoining land to increase density, with reduced boundary setbacks, allowing built development closer to the reserve boundary. This will result in potential adverse effects including shading and other changes to the microclimate at the boundary with the reserve, increase of surface water runoff given the nature of industrial sites having large areas of sealed or compact surfaces and an increase in weeds and pests.
5. I recommend that amendments to Plan Change 18 are made so that the effects on the reserve are considered as described above, and that these effects are avoided, remedied or mitigated by; either removing the 25 metre wide buffer strip adjoining the reserve boundary from Plan Change 18 or by; providing a 25 metre wide landscaped buffer strip along the southern boundary of the proposed Cromwell Industrial Extension boundary that separates the industrial activities from the reserve. New provisions would need to be included to ensure that the buffer strip was planted,

maintained and other controls on industrial development adjoining the buffer strip are included such as a no build restriction and revised light spill controls.

6. I support the proposed amendment to Rule 12.7.6(i) by the Council Officer to reduce the light spill allowance for industrial activities that adjoin the reserve provided that this occurs with the implementation of a buffer strip separating industrial activities and associated effects from the reserve.

Introduction

1. My full name is Elizabeth Moya Williams.
2. I have been asked by the Director-General of Conservation Tumuaki Ahurei (Director-General, D-G) to provide expert evidence on proposed Plan Change 18 – Cromwell Industrial Extension (PC18) to the Central Otago District Plan (CODP, Plan).

Qualifications and experience

3. I am employed by the Department of Conservation (DOC) in Dunedin as a Resource Management Act Planner. I have worked for DOC since June 2022.
4. Prior to this I have over fifteen years' of experience in resource management, including roles in both consenting and plan development. This includes four years as a planner at the Environment Agency (a national public body in England and Wales), a combined total of eleven years as a Consents Officer at Christchurch City Council, Campbell River City Council (Canada) and Tasman District Council, and two years as a Policy Planner at Dunedin City Council. I have experience in providing input on planning permits and Council plans from a national perspective, processing resource consents including notified/limited notified consents, Section 42A reporting for a plan variation and involvement in plan appeals and Environment Court mediation.
5. I hold a Bachelor of Resource and Environmental Planning with Honours from Massey University.
6. I am an Intermediate Member of the New Zealand Planning Institute.

Code of Conduct

7. Although this is a Council hearing, I have read the code of conduct for expert witnesses as contained in the Environment Court's Practice Note 2023 (the Code). I have complied with the Code when preparing my written statement of evidence.
8. The data, information, facts and assumptions I have considered in forming my opinions are set out in my evidence to follow. The reasons for the opinions expressed are also set out in the evidence to follow.
9. Unless I state otherwise, this evidence is within my sphere of expertise, and I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

Scope

10. I have been asked to provide evidence in relation to the notified PC18, the D-G's submission¹, and the section 42A report.
11. My evidence is divided into the following parts:
 - (a) Background
 - (b) D-G's submission
 - (c) Statutory Considerations
 - (d) Response to section 42A Council Officer's Report

Material Considered

12. In preparing my evidence I have relied upon the evidence of Technical Advisor (Ecology), Mr Warren Chinn.
13. I have read the following documents:
 - (a) Proposed Plan Change 18 Explanatory Statement and Section 32 Report
 - (b) The D-G's submission dated 9 December 2021
 - (c) The s42A report by Council Officer Ann Rogers dated 19 June 2023
 - (d) Relevant sections of the partially operative Otago Regional Policy Statement 2019 and proposed Otago Regional Policy Statement 2021.

Background

Plan Change 18 and adjoining Cromwell Chafer Beetle Nature Reserve.

14. The background to Plan Change 18 is set out in the Council's Explanatory Statement and is being provided to meet an increase in demand for industrial zoned land in Cromwell. Part of the land that is proposed to be rezoned, adjoins the Cromwell Chafer Beetle Nature Reserve ("the reserve") which is Crown owned land and managed by the Department of Conservation ("DOC"). The reserve is legally described as Lot 1 DP 18203.

¹ Submission on Plan Change 18 to the Central Otago District Plan dated 9 December 2021, Submission no. 8.

Establishment of the Cromwell Chafer Beetle Nature Reserve.

15. The 81-hectare reserve contains an extremely rare inland dune system which provides habitat to the Cromwell Chafer Beetle. This is the only remaining habitat for these beetles in the world and they are restricted to this site. Due to the significant ecological importance of the site, the reserve was established and fenced in 1979 following a submission to the Cromwell Borough Council Joint Planning Committee (Ferreira & McKinlay, 1999²). During 1982 the land was purchased by the Crown and was gazetted and classified as a 'nature reserve' under Section 20 of the Reserves Act (1977).
16. DOC actively maintains the dune habitat and manages the Cromwell Chafer beetle population within the reserve. Please refer to Mr Chinn's evidence for further details on the important ecological features of the reserve, the Chafer Beetle population and DOC's management commitments within the reserve.

Relevant Central Otago District Plan Map Overlays and surrounding existing activities.

17. The reserve and adjoining sites to the north and west are currently zoned Rural Resource Area under the Central Otago District Plan ("the District Plan"). The site is identified as having 'Significant Natural Value' on the District Plan planning map and is listed in Schedule 19.6.1 (Areas of Significant Indigenous Vegetation, Habitats of Indigenous Fauna and Wetlands) of the District Plan. A copy of this Schedule is in Appendix 1.
18. The triangular shaped reserve is bounded by Bannockburn Road to the east with adjacent residential development. The Council owned sites (Lots 3-4 DP526140) to the north of the reserve contains a worm farm business, a community motocross track, and Council designated land including a waste transfer centre, dog pound and exercise area. Further to the north are existing industrial activities.
19. To the west of the reserve is the Central Motor Speedway and a Motor Park mixed use commercial and residential subdivision. As part of the resource consent approval for the subdivision and land use (RC200231V1), a 25-metre buffer strip has been established adjoining the reserve. The District Plan zoning and surrounding activities are shown in Figure 1 below.

² Conservation monitoring of the Cromwell Chafer Beetle (*Prodontria lewisii*) between 1986 and 1987, Sam M Ferreira and Bruce McKinlay

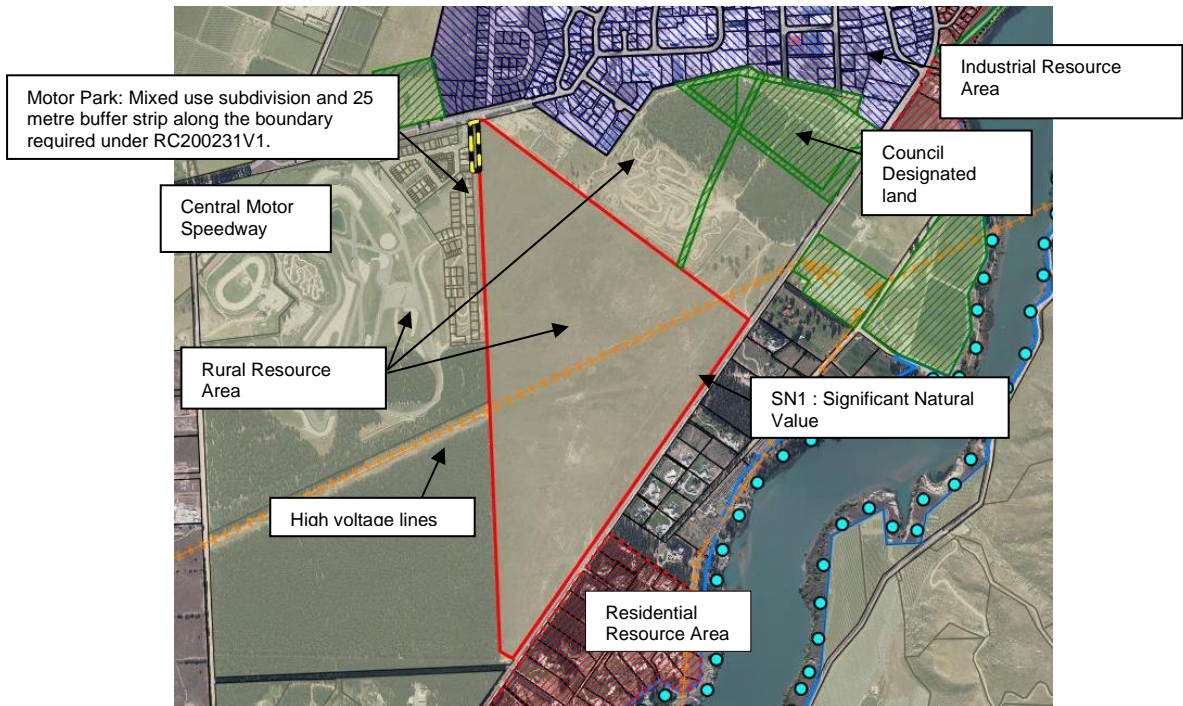


Figure 1: Current Central Otago District Planning Map and location of Motor Park

The Director-General's Submission

20. The D-G's submission opposed Plan Change 18 in part. Whilst the D-G was not opposed to the expansion of the industrial resource area in general, the submission sought that the Plan Change limit development on the land at the southern boundary of the industrial zone extension. The reason for this being the potential for adverse cross boundary effects on the habitat contained within the Cromwell Chafer Beetle Nature Reserve due to future industrial development on the adjoining land.
21. The submission identified potential effects on the reserve from the proposed Plan Change to allow for industrial development to include:
- (a) Potential changes in the micro-climate through shading and sheltering as a result of built development near to the boundary of the reserve;
 - (b) Potential for the cumulative effects of artificial lighting on adjacent buildings affecting the Chafer Beetle which is active during the night;
 - (c) Changes in hydrology due to potential surface water runoff from paved areas adjoining the reserve; and

- (d) The potential for weeds and pests to encroach into the reserve as a result of industrial development, leading to an increase in management requirements for DOC at the reserve.
22. The D-G sought that a 25 metre wide strip of land at the boundary with the reserve be removed from the proposed industrial zone for the purpose of avoiding cross boundary effects. Alternatively, it was recommended that a no building restriction be provided to limit development close to the boundary of the reserve. The relief sought will be discussed further in the section below responding to the Council Officer's s42A report.

Statutory Considerations

23. Section 2 of the s32 Report identifies the Statutory and Policy context. The following paragraphs consider the key statutory and 'higher order' documents which support the D-G's submission.

Part 2 of the Resource Management Act

24. The Council's s32 report identifies Section 5 and 7 of the Resource Management Act 1991 ("the RMA") being relevant to the variations that are subject to the s32 report. Whilst it is agreed that these sections are relevant, it is considered that Section 6 Matters of National Importance, paragraph (c) should also be considered.
25. Section 6(c) of the RMA states:

6. Matters of national importance

In achieving the purpose of this Act, all persons exercising functions and powers under it, in relation to managing the use, development, and protection of natural and physical resources, shall recognise and provide for the following matters of national importance:

...

(c) The protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna.

26. In my opinion, this section is relevant to the provisions of the Plan Change given that the Cromwell Chafer Beetle Nature Reserve is identified in the Central Otago District Plan as an area of significant habitat of indigenous fauna (Schedule 19.6.1, Item 1, page 19.41, refer to Appendix 1). As the reserve adjoins the proposed Plan Change

18 boundary, the management of cross boundary effects needs to be considered to ensure that the objectives and policies of the Plan Change achieve the purpose of the Act.

Otago Regional Policy Statements

27. A district plan must give effect to the partially operative Otago Regional Policy Statement 2019 ('PORPS') as required under Section 75(3)(c) of the RMA. Although the Section 32 report takes into account a number of provisions of the PORPS, it is considered that objectives and policies relevant to the protection of significant indigenous vegetation and significant habitats of indigenous fauna (and protection of indigenous biodiversity more generally) must also be considered. These are:
- Part B, Objective 3.1 – The values (including the intrinsic values) of ecosystems and natural resources are recognised and maintained, or enhanced where degraded.
 - Policy 3.1.9 – this policy requires that ecosystems and indigenous biological diversity in terrestrial environments are to be managed to maintain ecosystem health and indigenous biological diversity (clause a).
 - Objective 3.2 – Otago's significant and highly-valued natural resources are identified and protected, or enhanced where degraded.
 - Policy 3.2.2 – Managing significant indigenous vegetation and significant habitats of indigenous fauna – this policy requires significant adverse effects on values of the habitat to be avoided, remedied or mitigated (clauses c, d and e).
28. The Council must also have regard to any proposed regional policy statement under Section 74 (2)(c) of the Act. The proposed Otago Regional Policy Statement 2021 ('PORPS21') was publicly notified on 26 June 2021. The PORPS21³ contains the following relevant objectives and policies:
- ECO-O1 – Otago's indigenous biodiversity is healthy and thriving and any net decline in quality condition, quantity and diversity is halted.

³ The proposed Otago Regional Policy Statement referred to is the recommendations from the hearings report version dated 2 June 2023. The proposed RPS is currently at the hearing stage prior to decision.

- ECO-P3 – Protecting significant natural areas and taoka – this policy requires the protection of significant natural areas by avoiding adverse effects that result in any reduction of the area or values.

29. Based on the evidence provided by Mr Chinn noting the rarity of the Chafer Beetle's habitat within the reserve, the threat classification of the species as 'Threatened – Nationally Endangered'⁴ and the distinctiveness of the Cromwell Chafer beetle being endemic to the Otago Region, it is considered that the habitat within the reserve would meet the significance criteria in the PORPS (Schedule 4)⁵ and PORPS21 (APP2)⁶. Therefore Objective 3.2 and Policy 3.2.2 are particularly relevant to the Plan Change.

Response to s42A Council Officer's Report

30. The Council Officer's Report notes that DOC provided some additional information which is attached to the Officer's s42A Report, at Appendix 3. This was submitted to provide further context around the importance of the reserve as habitat for the Cromwell Chafer Beetle and additional information around the concerns that were raised in the D-G's submission.

Light Spill Provisions

31. Paragraphs 83-84 of the Council Officers s42A report proposes amendments to the light spill provisions in the District Plan, Chapter 12. Currently activities within the industrial zone are permitted to have a light spill of 20 lux (Rule 12.7.6(i)) where they do not adjoin residential activities. The Council Officer proposes amendments (refer to Appendix 4 of the s42A report) to this rule to require that no activities would result in greater than *10 lux spill* (horizontal and vertical) of light onto any adjoining property or road for sites located within the Cromwell Industrial Extension that adjoin the reserve. The Council Officer notes that this change is proposed in recognition of the sensitivities of the Chafer beetle and its nocturnal habits.

32. The evidence from Mr Chinn (paragraph 33) recommends the prevention of artificial night lighting to illuminate any part of the reserve due to the Cromwell Chafer Beetle and other invertebrates that reside in the reserve. It is anticipated that with both a

⁴ New Zealand Threat Classification System

⁵ Partially operative Otago Regional Policy Statement, Schedule 4, Criteria for the identification of areas of significant indigenous vegetation and habitat of indigenous fauna

⁶ Proposed Otago Regional Policy Statement, APP2 – Significance criteria for indigenous biodiversity (the recommendations from the hearing report version dated 2 June 2023). The amendments to APP2 of the PRPS21 do not alter my comments in paragraph 29.

buffer strip and the amendment to Rule 12.7.6(i) this could be achieved. I therefore support the Council's proposal to require a more restrictive control on light spill for sites adjoining the reserve, but this needs to be in combination with a buffer strip which is discussed in more detail below.

Request for a 25-metre buffer strip

33. The Council Officer's s42A report, at paragraphs 88-91 has sought further explanation in terms of why a 25-metre strip adjacent to the reserve has been requested and why this would be effective mitigation to prevent the effects of weeds, pests, or light spill.
34. As discussed in Mr Chinn's evidence (paragraph 23), the nature reserve is an extremely rare inland dune system and the only remaining habitat for these beetles. Today, the habitat on which the Chafer beetle survives is increasingly compromised by changed land use. Mr Chinn's evidence (paragraph 26 – 29) describes the 'edge effect' which is the differences shown in species composition and abundance between the core and periphery of a habitat. Mr Chinn comments that edges can be high-risk environments for core populations and in general a 'hard edge' (severe change) often tends to be occupied by opportunistic, disturbance-adapted organisms, such as weeds. Mr Chinn notes that currently, a noticeable strip of exotic weeds exist along most of the reserve boundaries.
35. Given the high sensitivity of the reserve environment particularly along the periphery, and the edge effects of the reserve described in Mr Chinn's evidence, the relief sought in the D-G's submission recommended that a buffer strip along the boundary of the proposed industrial zone be removed from Plan Change 18.
36. The primary function of the buffer strip would be to separate industrial activities and their associated boundary effects from the reserve, so that these edge effects would be absorbed within the buffer area and not within the reserve itself. Mr Chinn's evidence (paragraph 32) also notes that the goal of the buffer would be to produce the same microclimate either side of the reserve fence, thus preventing a corridor of weeds and unsuitable beetle habitat.
37. The Industrial Resource Area allows for a higher density of built development and reduced setback requirements from boundaries when compared to the Rural Resource Area (refer to comparison provided in Appendix 3 of the s42A report). This has the potential to have direct and cumulative adverse effects over the boundary that significantly reduce the already limited area of useable habitat for the species.

The option to allow for a buffer strip would ensure that the significant natural values of the reserve are protected.

38. The requested distance of 25 metres has been sought given that this is the same distance as what had been requested and is in place as part of the Motorsport Park subdivision which adjoins the western side of the reserve (approved via resource consent RC200231V1). The resource consent decision includes a condition of consent which requires that no buildings are to be established within 25 metres of the boundary, controls on landscaping and light spill along that part of the site where it adjoins the reserve (refer to Appendix 2). Therefore, the D-G has taken a consistent approach and requested that a 25-metre-wide buffer is provided along the northern side of the reserve.
39. It is noted that from Mr Chinn's ecological point of view (paragraph 32) he considers that the buffer should be up to 40 metres in width, to be sufficient to equilibrate hard edges between buildings and the reserve. He considers that this distance, in combination with a planted buffer would more likely dissipate the effects of industrial activities. However, as the D-G's submission only requested a width of 25 metres (as described above) it is noted that this is all that the District Council can consider. It is important to note nevertheless the purpose of having a buffer between the reserve and proposed Cromwell industrial extension boundary which is to dissipate the effects of industrial activities close to the reserve.

Maintenance of the buffer strip

40. The officer's report at paragraphs 89 and 90, questions how a buffer area of 25 metres would be managed to control weeds and what the expectation would be in terms of maintenance. I consider that this primarily comes down to landowners' responsibility for pest plant and weed control on their properties through the pest management requirements of the Otago Regional Council pest management strategy⁷.
41. In my opinion there are likely to be a range of options to achieve long term management of the buffer strip. If the area was removed from the Proposed Plan Change extent and retained as Council land, there may be the opportunity for Council to manage the area as open space. This would limit development in the buffer area while also providing for public access to the area around the reserve.

⁷ Otago Pest Management Plan 2019-2029

42. Alternatively, if the land was rezoned as part of Plan Change 18, provisions within the zone could be introduced to require a 'no build restriction' within the buffer strip. Rules for the no build restriction could require that the strip is landscaped (low lying native shrubs and ground cover), kept clear of buildings, structures and paving areas and that the retention and future maintenance is provided for as a condition of subdivision consent that is subject to a consent notice. Standards could also require the maintenance of the strip with requirements to replace any dead, diseased or damaged plants. This would ensure that the strip was maintained in the long term.

Comparison of the Rural Zone and Industrial Zone provisions

43. The Council Officer's s42A report, at paragraph 93 comments that the rural zone provides for an unlimited number of non-residential buildings setback 10 metres from the boundary. Whilst it is noted that the rural provisions could allow for this, I consider it to be fanciful to suggest that an unlimited number of non-residential buildings would be developed particularly given that the existing activities onsite are well established (i.e. the Community Motocross Track established approx. 2000) and that there is a very limited amount of development within the site and in the area adjoining the reserve boundary currently.
44. It is also noted that the minimum lot size for the Rural zone is 10 hectares whereas the Industrial zone provisions do not provide for a minimum lot size allowing for a higher density of development to occur along the reserve boundary. Industrial development also tends to have a much higher building coverage due to larger buildings being required as well as increased paved or compact surfaces for storage areas, parking and heavy machinery. The existing industrial development adjoining the Plan Change 18 land is an example of this form of development.
45. When comparing the zone provisions, it is also important to note that the objectives and policies for the Rural Resource Area (Section 4) seek to provide for the protection of areas of significant habitats of indigenous fauna, in particular from the adverse effects of land use activities and subdivision (Objective 4.3.8 and Policy 4.4.7) and to ensure that the subdivision and use of land in the Rural Resource Area avoids, remedies or mitigates adverse effects on the ecological values of significant habitats of indigenous fauna (Policy 4.4.10).
46. When comparing these current objectives and policies to the Plan Change 18 Industrial Resource Area provisions, the standards seek to ensure that existing amenity values are maintained, and adjoining resource areas (business and

residential) are not adversely affected. There is no consideration of adverse effects of land use activities and subdivision on the ecological values of significant habitats of indigenous fauna, even though the proposed extension of the Industrial Resource Area will adjoin the reserve which is identified in the plan as having significant natural values.

47. In addition, the explanation in the District Plan⁸ within the Rural Resource Area notes that the control of subdivision, particularly in respect of minimum allotment sizes, is a tool which assists in controlling the adverse effects on the land use that follows thereby promoting sustainable management. As there are no minimum allotment sizes required for the Cromwell Industrial Extension, land use activities that adjoin the reserve need provisions in the Plan to avoid, remedy or mitigate adverse effects on the significant ecological values of the reserve.

Comments on options proposed by the Council Officer

48. The Council Officer's report at paragraphs 94 to 100, considers two options:
- (a) Including a strip on the boundary adjoining the reserve providing for an indicative roading structure plan allowing for a 20-metre-wide legal road reserve; or
 - (b) Requiring a landscaped bund be installed along the boundary with the reserve with limits on the setback and height of the bund.
49. Mr Chinn's evidence (paragraphs 32-34) considers that the establishment of an 'ecological' buffer is preferred. It is my view that this is likely best achieved if the 25 metre buffer strip was removed from Plan Change 18 and planted/managed by the Council. There may also be opportunities to provide for a landscaped buffer with public access, a vegetated strip and a service access road such as what has been suggested by Mr Chinn in paragraph 32 of his evidence and the options proposed by the Council Officer.
50. We would be open to discussing possible options further with the Council. If the strip of land was to remain part of the Cromwell Industrial Extension area, details in terms of how stormwater runoff, lighting effects, a no build restriction and planting would be managed along the reserve boundary, and the necessary provisions to implement this, would need to be considered.

⁸ Central Otago District Plan, Section 04, Rural Resource Area, page 4.17

Conclusion

51. The reserve is identified in the Central Otago District Plan (Schedule 19.6.1) as an area of significant habitat of indigenous fauna. District Plans must give effect to the partially operative Otago Regional Policy Statement which contains policies that seek to avoid significant adverse effects on values of significant habitats of indigenous fauna (Policy 3.2.2). Based on Mr Chinn's evidence, it is considered that the reserve would be identified as significant against the significance criteria in the ORPS 2019. These policies are therefore relevant to Plan Change 18.
52. It is considered that the current objectives, policies and rules for the Industrial Resource Area as part of Plan Change 18 would enable development that could have a potential adverse effect on the significant values of the reserve along the boundary including shading, increased surface water runoff due to unlimited areas of seal or compact surfaces, increased light spill and weeds and pests.
53. Based on the evidence provided above, I recommend amendments to Plan Change 18 are made so that the significant natural values of the reserve are recognised, and the protection of the reserve is provided for in accordance with Part 2 of the Resource Management Act and the partially operative Otago Regional Policy Statement.
54. In my opinion the preferred option would be to remove a 25-metre buffer strip adjoining the reserve boundary from Plan Change 18 and that it remains as Council owned land. This could be managed by Council as open space, with plantings and a public access track to observe the reserve. It may also be possible to include an indicative service access road adjoining a landscaped strip as proposed by the Council Officer.
55. As noted above, we are open to discussing various options further if it was decided that a buffer strip is better managed as part of Plan Change 18. Regardless of what method is adopted, the most important point is to ensure that a buffer strip is provided to separate industrial activities from the reserve, to mitigate edge effects, and to ensure suitable beetle habitat at the boundary of the reserve to protect the significant natural values of the reserve.



Elizabeth Williams

Date: 26 June 2023

List of References

1. Submission on Plan Change 18 to the Central Otago District Plan dated 9 December 2021, Submission no. 8:
[4e9e4f334442478b311fd875edf20c6b_PC00018_Submission_DOC_20211209.pdf](https://www.amazonaws.com/4e9e4f334442478b311fd875edf20c6b_PC00018_Submission_DOC_20211209.pdf)
([amazonaws.com](https://www.amazonaws.com))
2. Conservation monitoring of the Cromwell Chafer Beetle (*Prodontria lewisii*) between 1986 and 1987, Science for Conservation 123, Sam M Ferreira and Bruce McKinlay, page 6: www.doc.govt.nz/documents/science-and-technical/sfc123.pdf)
3. The Proposed Otago Regional Policy Statement (recommendations from the hearing report version, dated 2 June 2023), Ecosystems and indigenous biodiversity, pages 205-207. <https://www.orc.govt.nz/media/14434/fpi-s42a-report-provisions.pdf>
4. New Zealand Threat Classification System: www.nztns.org.nz
5. Partially operative Otago Regional Policy Statement, Schedule 4, Criteria for the identification of areas of significant indigenous vegetation and habitat of indigenous fauna, page 122: https://www.orc.govt.nz/media/9658/rps_partially-operative_2019_2021.pdf
6. Proposed Otago Regional Policy Statement, APP2 – Significance criteria for indigenous biodiversity (the Recommendations from the hearing report version, dated 2 June 2023), page 291 : <https://www.orc.govt.nz/media/14391/reply-report-10-eco.pdf>
7. Otago Regional Council Pest Management Plan 2019:
https://www.orc.govt.nz/media/10068/orc-regional-pest-management-plan-2019-29_final_corrected-21.pdf
8. Central Otago District Plan, Section 04, Rural Resource Area, Policy 4.4.10 Explanation, page 4.17 [Section 04 - Rural Resource Area.pdf \(codc.govt.nz\)](https://www.codc.govt.nz/Section%2004%20-%20Rural%20Resource%20Area.pdf)

Appendix 1

Central Otago District Plan, Schedule 19.6.1, Item 1, page 19.41



SCHEDULE 19.6.1 : AREAS OF SIGNIFICANT INDIGENOUS VEGETATION, HABITATS OF INDIGENOUS FAUNA AND WETLANDS

ITEM	DESCRIPTION	AREA	LEGAL DESCRIPTION
1	Cromwell Chafer Beetle Reserve	81 ha	Lot 1 DP 18203
2	Lindis Pass	250 ha (approx)	Pt Sec 1 & 2 Blk III Lindis SD
3	Lauder Basin	1516 ha	Sec 1 SO 23583
4	Clutha/Lindis River Islands	65 ha	Islands in Clutha R adj Sec 7 Blk III
5	Flat Top Hill, Butchers Creek & Gully	819 ha	Sec 11 Blk XVII Cairnhill, Sec 25 Blk III Fraser SD & Closed Road
6	Bains Block	2080 ha (approx)	Pt Run 758 Blks III, VI & IX Whitecoomb, Blk III Cairnhill, Obelisk & Blks V & VIII Teviot SD
7	Hawkdun	2990 ha	Secs 1, 2 & 4 SO 24042
8	Hawkdun Conservation Area	1415 ha	Run 791 Blk II Idaburn, Blk IV Naseby & Run 793 Blk II Idaburn SD
9	Allens Peak Conservation Area	1413 ha	Run 738 Blks II & III Naseby & Blk VII Kyeburn SD
10	Upper Taieri Wetlands	2450 ha (approx)	Miscellaneous (see planning maps)
11	Serpentine Reserve	750 ha	Secs 1 & 2 Manor SD SO 19711 & 19712
12	Serpentine Wildlife Management Reserve	135 ha	Sec 2 Blk III Serpentine SD
13	Mt Kyeburn	437 ha	Sec 1 Blk I Mt Buster SD
14	Taieri Lake	4 ha (approx)	Sec 2 Blk XII
15	Bendigo Wetlands	154 ha	Pt Sec 38 Blk I & Pt Secs 28 & 34 Blk II Wakefield, Pt Sec 22 Blk II Tarras, Closed Road Blk I and Crown Land & Pt Bed of Clutha Blks I & II Wakefield & Crown Land Blk II Tarras SD
16	Pisa Waiorau	4018 ha	Run 629 Blks VIII, XII & XVI Cardrona & Blks IX & X Cromwell SD
17	Old Woman Range	3492 ha	Run 339F, Lornside & Obelisk, Blk VII Bannockburn & Blk V Nevis SD
18	Cone Peak	380 ha	Pt Run 345C Cone Burn & Kawarau SD
19	Cairnmuir	2321 ha	Secs 1 & 3 SO 24276
20	Earnsclough	7839 ha	Blk IV Fraser & Runs 249 & 249A Leaning Rock, Bannockburn, Fraserside, Obelisk & Cairnhill SD
21	Earnsclough (Aldinga)	370 ha	
22	Waikerikeri	330 ha	Pt Run 221 I
23	Bendigo	3077 ha	Run 238 M Wakefield & Tarras & Run 238 L Wakefield SD
24	Blackstone Hill	1447 ha	Pt Run 227
25	Locharburn	679 ha	Pt Run 808 & Sec 38 Blk VIII Tarras SD
26	Glenroy	1580 ha (approx)	Pt Run 345D Kawarau & Nevis SD
27	Mt Rosa	808 ha	Pt Run 345E Kawarau SD
28	Wentworth	3740 ha (approx)	Run 330C Kawarau & Nevis & Run 331 Nevis SD
29	Long Gully/Mt Difficulty	295 ha	Sec 1 SO 23879
30	Loch Linnie	680 ha (approx)	Pt Sec 2 SO 23209
31	Mt Pisa	2100 ha	Runs 730 & 731 Blks X, XII, XV & XVI Cardrona & Blks II & IV Tarras SD

Appendix 2

Exerts from the resource consent decision for RC200231(V1), Central Otago District Council, Cromwell Motorsport Park Trust Ltd, Cromwell

Conditions 36-41 for the subdivision consent, page 20

Chafer Beetle Reserve Mitigation

36. The consent holder shall review annually its Fire Risk Management Procedures and provide these to the Chief Executive for certification no later than 14 July in any year.
37. Within Lot 404 that adjoins the Chafer Beetle Reserve any planting will be limited to low native shrub species and ground cover planting.
38. The existing row of poplars immediately adjoining the boundary of the Chafer Beetle Reserve within Lot 404 shall be maintained so they do not exceed 5m in height.
39. Conditions 36-38 shall be subject to a consent notice that shall be registered on the record of title that contains Lot 404 pursuant to section 221 of the Resource Management Act 1991.
40. Exterior lighting on the rear elevation of buildings on Lots 201-218 shall be:
 - shielded from above in such a manner that the edge of the shield shall be below the whole of the light source.
 - have a filter to filter out the blue or ultraviolet light, provided the light source would have more than 15% of the total emergent energy flux (Watts per nanometre) in the spectral region below 440nm. The filters used must transmit less than 10% of the light at any wavelength less than 440nm. This therefore includes, but is not limited to, fluorescent, mercury vapour and metal halide lamps.
41. Condition 40 shall be subject to a consent notice that shall be registered on the records of title for Lots 201-218 pursuant to section 221 of the Resource Management Act 1991.

Condition 3 of the land use consent, page 21

3. Any development on Lots 201-251 shall comply with the following:

Bulk and Location of Buildings

- (a) The height of any building shall not exceed 8m; and no yards are required except that no buildings are to be established within 25 metres of the eastern boundary of the site where that boundary adjoins the Cromwell Chafer Beetle Reserve (Lot 1 DP 18203).