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Department of Conservation  
*Te Papa Atawhai*

9th December 2021

Central Otago District Council,  
PO Box 122  
Alexandra 9340

Email – [districtplan@codc.govt.nz](mailto:districtplan@codc.govt.nz)

To whom it may concern,

### **SUBMISSION ON PLAN CHANGE 18 TO THE CENTRAL OTAGO DISTRICT PLAN**

Please find attached a submission on behalf of the Director-General of Conservation in respect of Plan Change 18 to the Central Otago District Plan – Cromwell Industrial Zone Extension.

The Director-General recognises the need for the consolidation of development, in this case industrial development in Cromwell, and that this change is in keeping with the Cromwell Spatial Plan established in 2019.

The key issue to the Department of Conservation is the potential adverse effects the proposed extension of the industrial zone will have on the protected habitat within the adjacent Cromwell Chafer Beetle Nature Reserve in its current state. These potential adverse effects could be managed through mitigation and control measures in a revised plan change

The attached submission provides some further detail on this issue and details relief sought to potentially address my concerns.

If you have any questions or would like to discuss this submission, please contact Geoff Deavoll on 027 536 7020 or [gdeavoll@doc.govt.nz](mailto:gdeavoll@doc.govt.nz)

Ngā mihi,

A handwritten signature in black ink that reads "Holmes".

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Nicola J. Holmes  
*Pou Matarautaki*, Operations Manager  
Central Otago District  
Department of Conservation

## RESOURCE MANAGEMENT ACT 1991

### SUBMISSION ON PROPOSED PLAN CHANGE 18 TO THE CENTRAL OTAGO DISTRICT PLAN

**TO:** Central Otago District Council

**SUBMISSION:** Proposed Plan Change 18 to the Central Otago District Plan (**Plan Change 18**) Cromwell Industrial Zone Extension

**SUBMITTER:** Director-General of Conservation

**ADDRESS FOR SERVICE:** Department of Conservation  
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Christchurch Mail Centre  
Christchurch 8140

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### STATEMENT OF SUBMISSION BY THE DIRECTOR-GENERAL OF CONSERVATION

Pursuant to Clause 6 of the First Schedule, Resource Management Act 1991 (RMA), I Nicola Holmes, Operations Manager, Central Otago District, submit the following on behalf of the Director-General of Conservation:

#### SCOPE OF SUBMISSION

1. This submission relates to proposed Plan Change 18 in its entirety.

#### NATURE OF SUBMISSION

2. The Director-General of Conservation (**'the Director-General'**) opposes Plan Change 18 in part. The reason for this being the potential for adverse effects on the habitat contained within the Cromwell Chafer Beetle Nature Reserve to arise from enabling industrial development to occur on the adjacent land owned by Central Otago District Council.
3. My submission seeks that the Plan Change limit development on the land at the southern boundary of the industrial zone extension to limit the potential for future development to adversely affect the significant habitat values of the adjacent reserve.

#### BACKGROUND

4. The Director-General has all the powers reasonably necessary to enable the Department of Conservation (**'the Department'**) to perform its functions. A function of the Department is to advocate for the conservation of natural and historic resources generally. Section 2 of the Conservation Act 1987 defines 'conservation' to mean *'the preservation and protection of natural and historic resources for the purpose of maintaining their intrinsic values, providing*

*for their appreciation and recreational enjoyment by the public, and safeguarding the options of future generations’.*

5. The Director-General could not gain an advantage in trade competition through this Submission.

## REASONS FOR SUBMISSION

6. The decisions sought in this submission are required to ensure that Private Plan Change 18:
  - a. promotes the sustainable management of natural and physical resources as required by Part 2 of the RMA;
  - b. provides for the protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna as required by section 6 (c) of the RMA;
  - c. has particular regard to the intrinsic values of ecosystems as required by section 7 (d) of the RMA;
  - d. is otherwise consistent with Part 2 of the RMA.
7. 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.
8. A district plan must give effect to the partially operative Otago Regional Policy Statement 2019 ('ORPS'). Objectives and policies relevant to the protection of significant indigenous vegetation and significant habitats of indigenous fauna (and protection of indigenous biodiversity more generally) are set out in Part B Chapter 3 of the ORPS. Policies in the ORPS include:
  - Objective 3.1 – The values (including intrinsic values) of ecosystems and natural resources are recognised and maintained, or enhanced.
  - Policy 3.1.9 – Ecosystems and indigenous biological diversity – this policy requires ecosystems and indigenous biological diversity in terrestrial environments to be managed to maintain ecosystem health and indigenous biological diversity.
  - 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.

9. In this case the presence of 'Threatened' and 'At Risk' species and the rarity of their habitat within the nature reserve would classify the habitat within the nature reserve as significant against the significance criteria in the ORPS. Therefore Objective 3.2 and Policy 3.2.2 are particularly relevant to this plan change.
10. The Cromwell Chafer Beetle Nature Reserve (CCBNR) is an extremely rare inland dune system which provides habitat to the Cromwell Chafer Beetle, *Prodontria lewisii*. This is the only remaining habitat for these beetles in the world and they are restricted to this site.
11. The reserve also supports a suite of other native invertebrates, some endemic to Central Otago. These include; Sand scarab (*Pericoptus* sp.), *Costelytra zealandica*, numerous moth and butterfly taxa, cicada and spiders (including *Anoteropsis* – wolf spiders). Native birds such as pipits, oystercatchers, gulls, dotterel, kahu and karearea visit occasionally.
12. An important feature of the reserve is the salty soils and sand dunes. This is the only remaining example of this type of habitat in the ecological district. Although modified, the remnant natural features are highly significant. Native plant species including the Nationally Vulnerable sedge *Carex albula* and 'At Risk' woodrush *Luzula celata* depend on this habitat.
13. The reserve is one of few remaining examples of old glacial outwash surfaces in the upper Clutha basin (up to 25,000 years old). These were formed by unique local climatic and glacial conditions. Today, the surface on which the Chafer beetle survives is increasingly compromised by changed land use.
14. The Department manages the reserve, maintains the dune habitat, and manages the Cromwell Chafer beetle population. This includes pest control of redback spiders, mustelids, rabbits and hedgehogs. There is ongoing research into the ecology of the Cromwell Chafer beetle with an overarching goal of developing a translocation proposal and habitat monitoring.
15. Potential effects from industrial development on land to the north of the reserve include potential changes in the micro-climate through shading and sheltering the edge of the reserve from the harsh elements that contribute to the unique habitat requirements for the threatened fauna within the reserve.
16. Also, the potential for effects of artificial lighting on adjacent building has the potential to impact on the Chafer Beetle. While the lighting provisions for the industrial zone currently in the District Plan require light spill over the boundary to be avoided, there remains potential for effects from the cumulative effect of increase lighting on land adjacent to the reserve.
17. Changes in hydrology at a localised scale also has potential to impact on the nature of the reserve. This includes potential runoff of rainfall from hardstand areas overland into the reserve compromising the dry land characteristics of the reserve at the boundary.
18. As well as the concerns above there is the potential for an increase in mammalian pests and weeds spread through potential development activities on the land adjacent to the reserve, with potential for increase in management requirements for DOC at this site.
19. All of these potential effects combined have the potential to further reduce the area land within the nature reserve that is available as habitat for the Cromwell Chafer Beetle.

20. While the standard setbacks in the industrial zone where the zone adjoins land of another zone (7.5 metres) provide a buffer from activities on adjacent land, I do not expect that these setbacks when included in the plan, had in mind that the industrial zone was located adjacent to a nature reserve providing the only limited habitat for a threatened invertebrate species. I consider these setbacks to not be sufficient to avoid the potential effects on the reserve discussed above.

#### RELIEF SOUGHT

21. The Director-General opposes the proposed Plan Change 18 in the form as notified.
22. The Director-General seeks that a 25-metre-wide strip of land at the boundary with the Cromwell Chafer Beetle Nature Reserve is removed from the proposed industrial zone for the purpose of avoiding potential edge effects as described above.
23. It would be preferable if the strip of land removed from the proposed industrial zone, could be instead zoned as open space, which would have the dual effect of limiting future development in that buffer, while also providing for public access to the area around and to the reserve.
24. Alternatively, a no building restriction could be appended to the proposed industrial zoning to limit development close to the boundary with the reserve and to provide an appropriate buffer.
25. I do wish to be heard in support of my submission.

DATE: 9th December 2021

Ngā mihi



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Nicola J. Holmes  
*Pou Matarautaki*, Operations Manager  
Central Otago District  
Department of Conservation  
Acting pursuant to delegated authority  
on behalf of the Director-General of Conservation

A copy of the Instrument of Delegation may be inspected at the Office of the Director-General of Conservation.