

# Submission on Notified 08 Resource Consent PL250405788



1 Dunorling Street  
PO Box 122, Alexandra 9340  
New Zealand

03 440 0056

Info@codc.govt.nz  
www.codc.govt.nz



## Submission on Notified Resource Consent

Reference	PL250405788	Submitted	03 Apr 2025 03:58
-----------	-------------	-----------	-------------------

### Notified Submission

## SUBMISSION ON NOTIFIED APPLICATION CONCERNING RESOURCE CONSENT

(Form 13)

### Section 95A (public) Resource Management Act 1991

To: The Chief Executive  
Central Otago District Council  
PO Box 122  
Alexandra 9340

This is a submission on the following resource consent application:

<b>Resource Consent Number</b>	240186
<b>Valuation Number</b>	2842107723
<b>Applicant</b>	Enfield Limited
<b>Location of Site</b>	191 Fay Lane, Queensberry
<b>Brief Description of Application</b>	Subdivision consent to subdivide property into 11 lots and land use consent to establish 9 residential building platforms in a rural resource area
<b>Submissions Close</b>	4.00pm on Thursday 3 April 2025

# Writing a submission

The following will be required during this process:

- Your full name and address, telephone number and email address
- Whether you support or oppose the application for resource consent
- The reason for your submission
- The decision you wish the Council to make, including any conditions sought
- Whether you wish to be heard.

## Important information so you don't lose your data

If you wish to take some time completing this form, we strongly recommend that you **create a [login](#) and log in to your account prior to starting to complete the form**. This gives you the ability to save a draft and return to it later.

If you are a club or organisation, please use an email that is associated with the club rather than your work or personal email.

Logging in before starting to enter information into the form also means you won't lose your information if the form times out, or if you accidentally navigate away from the screen you're working on.

You cannot save your information and return to it later unless you log in before you start the form.

Regardless whether you are logged in, once you have completed and submitted the form, you will receive a copy of your submission to the email address you specify in the form.

Either go to our [Online Services](#) page to create an account (or log in if you already have an account) or continue below to start without logging in.

## Privacy

The information you provide is official information and is used to help process your application. The information is held and used in accordance with the Local Government Official Information and Meetings Act 1987 and the Privacy Act 2020. This means that your information may be disclosed to other people who request it in accordance with the terms of these Acts. Under the Privacy Act 2020 you have the right to see and correct any personal information that Council may hold about you.

## Declaration

**By continuing with this application you certify that: The Yes information you provide is true and correct to the best of your knowledge.**

## Notified Submission

## Notes to submitter

1. If you are making a submission to the Environmental Protection Authority, you should use [form 16B](#).

The closing date for serving submissions on the consent authority is the 20th working day after the date on which public or limited notification is given. If the application is subject to limited notification, the consent authority may adopt an earlier closing date for submissions once the consent authority receives responses from all affected persons.

2. You must serve a copy of your submission on the applicant as soon as is reasonably practicable after you have served your submission on the consent authority.
3. If you are a trade competitor, your right to make a submission may be limited by the trade competition provisions in [Part 11A](#) of the Resource Management Act 1991.
4. If you make a request under [section 100A](#) of the Resource Management Act 1991, you must do so in writing no later than 5 working days after the close of submissions and you will be liable to meet the additional costs of the hearings commissioner or commissioners, compared to our hearing panel. Typically these costs range from \$3,000 - \$10,000.
5. Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):
  - it is frivolous or vexatious:
  - it discloses no reasonable or relevant case:
  - it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
  - it contains offensive language:

It is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

**In lodging this submission, your submission, including contact details, become public information and will be available for anyone to view.**

## DETAILS OF SUBMITTER

Full name	QEII National Trust
Contact person (if applicable)	Daniel Ryan Bradfield
Electronic address for service of submitter:	dbradfield@qeii.org.nz
Phone number - day time	04 471 4191
Postal address (or alternative method of service under <a href="#">section 352</a> of the Act):	PO Box 3341 Wellington 6140

## Your Application

Please select one regarding the application	I neither support or oppose
Do you wish to be heard in support of this submission?	No - I do not want to be heard
Are you a trade competitor for the purposes of <a href="#">section 308B</a> of the Resource Management Act 1991?	I am not
I would consider presenting a joint case if others make a similar submission	No

## Details of submission

The specific parts of the application that my submission relates to are:

The submission - include:

- whether you support or oppose the specific parts of the application or wish to have them amended; and
- the reasons for your views.

[3499\\_001.pdf](#) (444 kb)

I seek the following decision from the consent authority.

*Give precise details, including the general nature of any conditions sought*

Section 3.1.8 - Ecology, and wider considerations (see attached document).

See attached document.

We request that any consent, if issued, incorporate and build onto all recommendations in the Wildlands Report. Further, we request that the formal protection area proposed in the Wildlands Report adjoin QEII's open space covenants (and buffer them from development or erection of structures).

We request that alternative fire barriers are considered. Several of the native species proposed for planting as fire barriers would require considerable attention, including watering, in this exposed semi-arid environment where topsoil has largely been lost through historic burning and grazing by domestic stock and rabbits.

We request that the proposed protection area incorporate most, or all, of the areas mapped in the Wildlands Report as vegetation units 1-10 and 16 including areas proposed for underplanting. We further request that QEII is considered as the covenanting body.

We request that further subdivision of these blocks should be permanently precluded. Keeping block sizes large allows for biodiversity and landscape values to be managed in a more cohesive and less fragmented way.

We request that keeping of domestic cats by residents should be prohibited (given the herpetological values identified and the presence of native birds, and that the proposed subdivision neighbours a largely indigenous natural environment).

Select below - Pursuant to [section 100A](#) of the Act, that you delegate your functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority. "See note 4 (second tab) as you may incur costs relating to this request."

Any other comments?

In lodging this submission, I understand that my submission, including contact details, are considered public information, and will be made available and published as part of this process.

I do not request

Yes

Please sign (click on the words CAPTURE)

A handwritten signature in black ink, appearing to be 'D. Brabbs'.

Date signed:

03/04/2025



1 Dunorling Street  
PO Box 122, Alexandra 9340  
New Zealand

03 440 0056

Info@codc.govt.nz  
www.codc.govt.nz



## SUBMISSION ON NOTIFIED APPLICATION CONCERNING RESOURCE CONSENT

(Form 13)

### Section 95A Resource Management Act 1991

To: The Chief Executive  
Central Otago District Council  
PO Box 122  
Alexandra 9340  
[resource.consents@codc.govt.nz](mailto:resource.consents@codc.govt.nz)

### DETAILS OF SUBMITTER

Full name: QEII National Trust

Contact person (if applicable):  
Daniel Ryan Bradfield and Rob Wardle

Electronic address for service of submitter: dbradfield@qeii.org.nz rwardle@qeii.org.nz

Telephone: +64 4 471 4191 +64 20 4012 6483

Postal address (or alternative method of service under [section 352](#) of the Act):  
PO Box 3341, Wellington 6140

This is a submission on the following resource consent application: RC No: **240186**

Applicant: **Enfield Limited** Valuation No: **2842107723**

Location of Site: **191 Fay Lane, Queensberry**

Brief Description of Application: **Subdivision consent to subdivide property into 11 lots and land use consent to establish 9 residential building platforms in a rural resource area.**

Submissions Closing: **4.00pm on Thursday 3 April 2025**

The specific parts of the application that my submission relates to are:

*(give details, attach on separate page if necessary)*

Section 3.1.8 - Ecology, and wider considerations (see attached document).

---

---

This submission is: *(attach on separate page if necessary)*

*Include:*

- *whether you support or oppose the specific parts of the application or wish to have them amended; and*
- *the reasons for your views.*

See attached document.

---

---

---

---

I/We seek the following decision from the consent authority:

*(give precise details, including the general nature of any conditions sought)*

See attached document.

---

---

~~I support/oppose the application~~ OR neither support or oppose (select one)

~~I wish~~ / do not wish to be heard in support of this submission (select one)

I am/am not\* a trade competitor for the purposes of [section 308B](#) of the Resource Management Act 1991 (select one)

\*I/We am/am not (select one) directly affected by an effect of the subject matter of the submission that:

(a) adversely affects the environment; and

~~(b) does not relate to trade competition or the effects of trade competition.~~

*\*Delete this paragraph if you are not a trade competitor.*

~~\*I/We will consider presenting a joint case if others make a similar submission~~

*\*Delete this paragraph if not applicable.*

I ~~request~~/do not request (select one), pursuant to [section 100A](#) of the Act, that you delegate your functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority. "See note 4 below as you may incur costs relating to this request."

*DR Braundfield*

Signature

(to be signed by submitter or person authorised to sign on behalf of submitter)

*3 April 2025*

Date

In lodging this submission, I understand that my submission, including contact details, are considered public information, and will be made available and published as part of this process.

---

### **Notes to submitter**

1. If you are making a submission to the Environmental Protection Authority, you should use [form 16B](#).

The closing date for serving submissions on the consent authority is the 20th working day after the date on which public or limited notification is given. If the application is subject to limited notification, the consent authority may adopt an earlier closing date for submissions once the consent authority receives responses from all affected persons.

2. You must serve a copy of your submission on the applicant as soon as is reasonably practicable after you have served your submission on the consent authority.
3. If you are a trade competitor, your right to make a submission may be limited by the trade competition provisions in [Part 11A](#) of the Resource Management Act 1991.
4. If you make a request under [section 100A](#) of the Resource Management Act 1991, you must do so in writing no later than 5 working days after the close of submissions and you will be liable to meet the additional costs of the hearings commissioner or commissioners, compared to our hearing panel. Typically these costs range from \$3,000 - \$10,000.
5. Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):
  - it is frivolous or vexatious:
  - it discloses no reasonable or relevant case:
  - it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
  - it contains offensive language:

it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

**Central Otago District Council**  
**RC No: 240186 – Submission**



TO: Central Otago District Council  
PO Box 122  
Alexandra 9340  
[resource.consents@codc.govt.nz](mailto:resource.consents@codc.govt.nz)

From: Queen Elizabeth the Second National Trust  
PO Box 3341  
Wellington 6140

3 April 2025

**1. Full name of submitter:** Queen Elizabeth the Second National Trust (QEII)

**2. Resource Consent number:** 240186

**3. Our submission:**

QEII currently administers two open space covenants directly east of and adjoining 191 Fay Lane (and the site proposed for subdivision) – being open space covenants 5-12-267 and 5-12-306 registered on Record of Title 597225 (owned by International College of Herbal Medicine Limited). These open space covenants protect kanuka treelands, mixed herbfields/cushion fields and riparian kanuka tree lands with a diverse native understory.

QEII would consider being the covenanting body for any protected areas as part of the proposed subdivision provided that QEII is consulted regarding proposed areas for protection. Any proposed areas for protection would need to adjoin existing QEII open space covenants and protect the full range of habitats identified in the Assessment of Ecological Effects for a Proposed 10 Lot Subdivision, Queensberry, Central Otago (**Wildlands Report**). As the open space covenant(s) would be of a mitigatory nature, QEII's costs would need to be covered by the applicant (primarily fencing, survey and administrative costs).

**4. We seek the following decision from Central Otago District Council:**

We request that any consent, if issued, incorporate and build onto all recommendations in the Wildlands Report. Further, we request that the formal protection area proposed in the Wildlands Report adjoin QEII's open space covenants (and buffer them from development or erection of structures).

We request that alternative fire barriers are considered. Several of the native species proposed for planting as fire barriers would require considerable attention, including watering, in this exposed semi-arid environment where topsoil has largely been lost through historic burning and grazing by domestic stock and rabbits.

We request that the proposed protection area incorporate most, or all, of the areas mapped in the Wildlands Report as vegetation units 1-10 and 16 including areas proposed for underplanting. We further request that QEII is considered as the covenanting body.

We request that further subdivision of these blocks should be permanently precluded. Keeping block sizes large allows for biodiversity and landscape values to be managed in a more cohesive and less fragmented way.

We request that keeping of domestic cats by residents should be prohibited (given the herpetological values identified and the presence of native birds, and that the proposed subdivision neighbours a largely indigenous natural environment).

5. Do you wish to be heard in support of your submission? No
6. If others make a similar submission would you be prepared to consider presenting a joint case with them at any hearing? No

DR Bradfield

SIGNATURE

Daniel Ryan Bradfield

NAME

3 April 2025

DATE

Senior Solicitor

POSITION

**Address for service of submitter:** PO Box 3341; Wellington 6140

**Telephone No:** 04 471 4191; 020 4012 6483

**Email:** [dbradfield@qeii.org.nz](mailto:dbradfield@qeii.org.nz); [rwardle@qeii.org.nz](mailto:rwardle@qeii.org.nz)

**Contact person:** Daniel Bradfield – Senior Solicitor; Rob Wardle – Regional Representative (Central Otago)