

**BEFORE THE COMMISSIONERS APPOINTED BY THE CENTRAL OTAGO
DISTRICT COUNCIL**

UNDER

the Resource Management Act 1991

IN THE MATTER

of RC230179 an application for a 33-lot
subdivision at Rocky Point on Tarras-
Cromwell Road (SH8)

BETWEEN

TKO PROPERTIES LIMITED

Applicant

SECOND SUPPLEMENTARY STATEMENT OF EVIDENCE OF JEFFREY BROWN

Dated:

19 May 2024

Introduction

1. My name is Jeffrey Brown. My qualifications and experience are set out in paragraphs 1.1 – 1.2 of my evidence in chief (**EIC**) dated 4 November 2024.
2. I confirm my commitment, as expressed in paragraph 1.3 of my EIC, to the Code of Conduct for Expert Witnesses in the Environment Court Practice Note 2023.
3. The purpose of this second supplementary statement of evidence is to respond to the matters raised in Minute 10 of the Hearing Panel dated 2 May 2025.

Removal of Lot 7

4. In paragraphs 4 – 7 of the Minute the Panel recognises the removal of Lot 7 from the plans and seeks explanation for that change.
5. I refer to Mr Wells' statement *Response to ecological queries raised in Minute 10 of the Hearing Panel, Rocky Point*, dated May 2025. Paragraph 3.1 sets out the ecological reasons for the removal of Lot 7. These are, in summary, that the removal of Lot 7 would reduce the area of indigenous cushionfield vegetation and habitats affected, reduce the numbers of threatened plants and their habitat removed, increase the area of higher value cushionfield being maintained through control of colonising woody species, and improve the connectivity between indigenous vegetation and habitats within the western portion of the Rocky Point site.
6. I rely on Mr Wells' advice in this regard.

Planting plan for Lots 27 – 30

7. In paragraph 11 of the Minute the Panel questions the plan versions. On Baxter Design Group's plan *Revised Scheme Plan Ref 4371-SK164*, dated 22 April 2025, the notation that the landscaping on that plan has been superseded by plan SK152 is not correct.
8. The correct plan for the Panel to consider is plan SK137. That plan is provided in the Applicant's response package to Minute 10.

J A Brown

19 May 2025