



SUBMISSION ON NOTIFIED APPLICATION CONCERNING RESOURCE CONSENT

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(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

DETAILS OF SUBMITTER

Full name: Trevor Wayne, Lynette Marie Newton

Contact person (if applicable):

Trevor Newton

Electronic address for service of submitter: trevlynnewton124@gmail.com

Telephone: 027 213 7012

Postal address (or alternative method of service under [section 352](#) of the Act):

124 Hawley Rd
180 Alexandra 9391

This is a submission on the following resource consent application: RC No: **250259**

Applicant: **Ao Marama Limited** Valuation No: **2845100226**

Location of site: **Strode Road, Earnsclough**

Brief description of application: **Subdivision consent for a 8 lot subdivision in the rural resource area**

Submissions close: **4.00pm on 04 May 2026**



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

(give details, attach on separate page if necessary)

1.1.7 Environmental Offsets, 4.4.12 Policy,
1.1.14 Services Domestic water for lots 5-8, 4.4.9 Policy,
1.1.3 Access,

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

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

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

see attached

I/We support /oppose /neither support or oppose the application (circle one)

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

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

~~I/We am / am not (circle 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/We request* / do not request (circle 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.**



Signature of submitter

(or person authorised to sign on behalf of submitter)

Date

4/5/2026

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](#).
2. 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.
3. 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.
4. 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.
5. 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.
6. 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.

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

(give details, attach on separate page if necessary)

1.1.7 Environmental offsets The applicant proposes that 182 ha of Lot 1 be subject to a QEII covenant to be registered on the title as an offset against any potential adverse effect on the visual amenity of the area resulting from the proposal. The covenant would include provisions to protect the outstanding natural landscape that exists here from further building development or subdivision and to facilitate the ongoing restoration of the indigenous vegetation that existed here originally. The applicant has also entered into a programme of wilding pine control on the property which has effectively removed a major seed source from spreading onto surrounding land. A programme of follow-up seedling control is being carried out along with a programme of controlling other weeds on the property, particularly broom and cotoneaster.

4.4.12 Policy – Weed and pest plant and animal infestation to encourage land use practices that avoid, remedy or mitigate weed infestation, in particular wilding tree spread, and the spread of pest plants and animals throughout the district. Comment The applicants have carried out a programme of wilding pine control to eradicate what has been a major source of spread onto neighbouring properties. The 10 | Page conditions of the QEII covenant will require the current and future owners to maintain the land free of wilding conifers. A programme of broom control has also been carried out as well as spraying cotoneaster and other invasive shrub species.

Our Comment:-

As members of the QE 2 Trust we applaud the efforts to lock in perpetuity a significant area of land. However our concerns are with the increased fire risk that comes with locking up a large parcel of land in an area with low rainfall and a dry climate. No stock has been on the property recently and we have noticed an increase in the number of rabbits, hares and deer which has affected our fruit trees. We have leased a significant area of our land to a market gardener and we do not want them to be impacted by this. A detailed fire response plan is needed. The applicants need to submit a comprehensive pest control plan with details of who will monitor pest numbers and who will carry out pest destruction work. If shooting is involved the applicants need to submit a plan to ensure the safety of neighbouring properties and people.

1.1.4 Services Domestic water for Lots 5 – 8 is to be provided by piped supply from an existing bore within Lot 6 (as shown in Plans 2.1 & 2.2) that will be pumped to a header tank within Lot 1 and reticulated to each lot by underground pipe. Each residence is expected to have at least a 30,000 litre tank for buffering and firefighting purposes. Reticulation of water will require an easement over adjoining land and a license to occupy over legal road. Water to Lots 2 – 4 is to be provided by piped supply from an existing well within Lot 1 (shown on plan 3.1) that is in close proximity to the proposed building platforms. Water is to be pumped to a header tank and reticulated to each lot by underground pipe by solar pump.

Our Comment:-

With 182ha of land proposed to put into a QE 2 covenant we believe this will increase the fire risk of this block of land enormously, it is proposed that each residence is “expected to have at least a 30,000 litre tank” for buffering & firefighting which we believe is not substantial enough for fire fighting in such a landscape. On our property of 10.5218ha we have a 30,000 litre tank and a large irrigation dam and we do not believe that would be enough water in the event of an outbreak of fire due to the type of landscape & dryness of ground & cover of vegetation. It is also our concern with the additional proposed lots of this submission that this may well effect our natural water supply as we have a bore on our property and are a member/shareholder of the Earnslceugh Irrigation Company who provides us with water to irrigate our property which was formerly a orchard and now a vege growing operation and under the submission being submitted there is no allowance for how this proposal will effect the neighbouring properties.

4.4.9 Policy – Effects of rural activities To recognise that some rural activities, particularly those of a short duration or seasonal nature, often generate noise and other effects that can disturb neighbours by ensuring that new developments locating near such activities recognise and accept the prevailing environmental characteristics associated with production and other activities found in the Rural Resource Area. Comment 8 | P a g e Reverse sensitivity can sometimes be an issue with residential use in close proximity to rural areas such as orchards. In this case the closest house site is 150 metres from an orchard and is therefore unlikely to be affected by normal orchard activities.

Our Comment:-

Living in the area of Hawley Road Earnsclough surrounded by working orchards and farmland, there are never times when there is nothing going on, on the surrounding land orcharding & farming is a 7 days a week for 365 days of the year. Coming from a farming & casualty stock business background in southland we understand the processes but wonder if future landowners that may purchase any of the blocks in the proposed sub division really understand what this is like, with picking, spraying, thinning, frost fighting and the many other activities associated with orcharding especially & to a lesser degree farming but not disallowing that there are busy times in farming as well. Having owned our property in Hawley Road for 25 years we have certainly noticed and increase in all the above mentioned activities and especially traffic as the area has developed. Our concern is the future landowners of the subdivision may not understand what it takes to operate an orchard or farming operation and have the potential to interrupt the commercial operation of these entities which are an important part of the Clyde & Alexandra economic potential

4.4.12 Policy – Weed and pest plant and animal infestation To encourage land use practices that avoid, remedy or mitigate weed infestation, in particular wilding tree spread, and the spread of pest plants and animals throughout the district. Comment The applicants have carried out a programme of wilding pine control to eradicate what has been a major source of spread onto neighbouring properties. The 10 | P a g e conditions of the QEII covenant will require the current and future owners to maintain the land free of wilding conifers. A programme of broom control has also been carried out as well as spraying cotoneaster and other invasive shrub species.

Notwithstanding the rule in 4.7.5(iii), the applicant believes that the subdivision proposal as presented does not have significant adverse effects on the landscape and amenity values or the transport network or groundwater. The applicant believes that the net effect of the proposal, when considered in light of the environmental offsets proposed, will have a net long term positive outcome for the landscape amenity, significant indigenous vegetation and integrated comprehensive mixed-use development. Furthermore, the proposal will help facilitate the control of pest plants including wilding pines and broom within the property.

Comment The natural character of water bodies and their margins. There are no water bodies within the subject land.

1. Potential for visual absorption of future built development with particular attention being given to those areas identified as outstanding natural landscapes and significant amenity landscapes on the planning maps.

. Capability for sustainable use of the productive land and soil resource. Comment The entire area of the subject land has very limited potential for sustainable productive use it being dryland, mainly LUC class VII that is highly rabbit prone under pastoral use. 4. The potential for reverse sensitivity effects and methods to address such effects on existing rural production activities and on existing infrastructure, including the use of separation distances and yards. Comment Although the property adjoins a commercial orchard on Hawley Road, the proposed new allotments and house sites are between 150 and 500 metres from orchard land.

Reverse sensitivity is therefore not considered to be a likely issue. 5. The adequacy of the allotment in respect of its ability to safely dispose of effluent and stormwater on-site, without compromising health, and the quality of ground and surface water resources. Comment All the proposed house sites have sufficient area of sloping land surrounding them within their allotments to provide for adequate and safe disposing of effluent (see attachment 26). 6. The provision of an adequate water supply, given the intended use of the allotments, unless an allotment is incapable of being occupied by a dwelling. Comment The applicants have established and tested two bores which will provide adequate quantity and quality of drinking water for the proposed residential uses (see attachments 28 & 29). 7. The location, design and construction of access, and its adequacy for the intended use of the allotments.

Comment The location of access roads is shown on the attached subdivision plans (see attachments 17 & 18). It is proposed that consent to subdivision be conditional on vehicle access being constructed to the required council standard. 8. The provision of adequate utility services, (including roading), and in particular the location, design and construction of these services. Comment Road access to the proposed rural residential allotments has been constructed to a preliminary standard off Hawley Road. This access is partly within legal road reserve however it will require a private ROW easement in part to access. This effectively makes the road a private road for use by the lot owners only and access to the balance land. Ongoing maintenance would therefore be the responsibility of the lot owners. Electricity is proposed to be provided by underground cable to Lots 5 to 8 from Hawley Road. It is proposed that residences within Lots 3 to 5 be off grid using independent solar generated electricity. Domestic water is proposed to be provided by underground pipe from existing bores shown on Plans 2.1 and 3.1. 9. Earthworks necessary to prepare the site for occupation and/or use. Comment Preparation of house sites will occur after sale. It is proposed that conditions pertaining to earthworks necessary for preparing house sites and driveways be applied at the time of building consent.

This option is considered inappropriate for this location as it is considered not in keeping with the surrounding semi-rural character of the area. 16. Whether or not the applicant will commit or has committed to work or services as environmental compensation (such as the control of wilding pines) and if so committed, whether it is or will be: • to remedy at least in part any adverse effects of onsite works; or on the site or within the same general area, landscape or environment as the proposed activity; and/or • effective by way of conditions, bond or covenant; and/or • the product of public consultation or participation. Comment The applicant has recently carried out an extensive programme of wilding pine control and has committed to eradicating all conifers species capable of spreading from the property. The property has been a significant source of spread of wilding pines onto neighboring properties, so this control work has allowed for the wider wilding pine control programme in the area to be successful. The applicant intends to carry out a programme of landscape restoration on the balance land by controlling invasive weed species such as broom and cotoneaster and by planting native species that would have previously been present in this landscape. Furthermore, the applicants propose as a condition of consent an offset to any adverse effect of the proposed subdivision on natural landscape character and amenity values of the land in the form of a QEII covenant to be registered against that proportion of the balance land shown on the subdivision plan (see Plan 1.2, attachment 3). The covenant's principal objectives will be to 16 | P a g e protect the landscape amenity values by prohibiting further subdivision and supporting the restoration of the indigenous vegetation on the land. 17. The appropriate size of any allotment bearing in mind any of the above factors. Comment The allotments are of a size consistent with the rural character of the area. 18. Any objectives and policies relevant to the above matters. Comment The proposal is assessed against the objectives and policies of the Central Otago district plan in Section 2.3 of this report.

Pests Rabbits are the greatest current threat to restoration objectives for Ao Marama. Rabbits are currently in low number, probably partly due to low numbers when originally part of Earnscliffe Station who were diligent in their rabbit control and partly due to the ongoing effects of the RHD virus introduced in 1996. The boundaries of the property are rabbit fenced. The short-term control strategy for rabbits is to destock the property with the aim of maintaining a long grass environment which is undesirable for rabbits. Rabbit numbers will be monitored and ground control carried out if numbers exceed that allowed by the ORC. The long-term control strategy is to encourage the restoration of the land toward a native forest/shrubland vegetation cover that does not support a

high rabbit population. As part of the restoration programme, a predator control programme involving trapping of possums, mustelids, hedge hogs and wild cats will be carried out. This will allow the recovery of bird and lizard populations that would normally exist in this environment.

Ongoing Maintenance Maintenance of the restored landscape is essential to ensure the long-term success of the Ao Marama restoration efforts. This involves regular monitoring of plant and animal populations, as well as ongoing weed and pest control to prevent reinvasion. Maintenance activities are scheduled throughout the year, with particular attention given to the early stages of plant establishment and periods of high pest activity. In conclusion, the Ao Marama Landscape Restoration Plan represents a comprehensive effort to restore a once-thriving indigenous ecosystem. By integrating ecological principles and the community's aspirations for maintaining Central Otago's unique and outstanding landscape, the plan aims to create a resilient and vibrant landscape that will be cherished by future generations. The journey to restoration is ongoing, but with continued dedication and support, the vision of a restored Ao Marama can be realised.

Our Comment:-

The applicant states in 4.4.12 (3) that the boundaries of the property are rabbit fenced. This is incorrect

1.1.3 Access Access to Lots 5 to 8 is to be provided by an upgraded access road which is partly located on legal road reserve and partly over neighbouring land on which a legal right of way is to be created. Access shall be formed to connect with Hawley Road within legal road reserve in accordance with the council's standards at the applicant's cost. Formed road access through Lot 1 exists to within close distance of the proposed building platforms within lots 2 - 4.

Our Comments:-

With regard to the access to lots 5 to 8 off Hawley Road to the south of 95 Hawley Road, we believe this to be at a dangerous place on a sweeping bend for access to 4 potential house lots, with the increase of traffic on Hawley road without this sub division it may create a traffic problem to the adjoining properties.

The submission is

So in general we neither support or oppose the application for the sub division

All the points raised in the above are due to the lack of factual information including a plan and actual details of how they are going to achieve their outcomes the applicant needs to provide more detail. How they are going to keep pests out of this block and how often pest control would be done, with exact means is this trapping/shooting or just monitoring of numbers of rabbits/possums/deer and who is the person/business doing this, what actual plan has been implemented to control the long grass vegetation, there is no mention of fencing this area.

We seek the following decision from the consent authority

That the applicants provide more detail to address our concerns re the Fire Risk and the issues around animal pest control.