

**IN THE ENVIRONMENT COURT
CHRISTCHURCH REGISTRY**

ENV

Under the Resource Management Act 1991
In the matter of appeals under clause 14(1) of the First Schedule to the Act

Between **FEDERATED FARMERS OF NEW ZEALAND (INC) MACKENZIE
BRANCH**
ENV-CHC-2009-000193

**HIGH COUNTY ROSEHIP ORCHARDS LIMITED AND
MACKENZIE LIFESTYLE LIMITED**
ENV-2009-CHC-000175

MOUNT GERALD STATION LIMITED
ENV-2009-CHC-000181

MACKENZIE PROPERTIES LIMITED
ENV-2009-CHC-000183

**MERIDIAN ENERGY LIMITED AND GENESIS ENERGY
LIMITED**
ENV-2009-CHC-000184

THE WOLDS STATION LIMITED
ENV-2009-CHC-000187

FOUNTAINBLUE LIMITED & OTHERS
ENV-2009-CHC-000190

R, R AND S PRESTON AND RHOBOROUGH DOWNS LIMITED
ENV-2009-CHC-191

HALDON STATION
ENV-2009-CHC- 000192

Appellants

And **MACKENZIE DISTRICT COUNCIL**
Respondent

**STATEMENT OF EVIDENCE OF NICOLA ANNE SCOTT ON BEHALF OF
MT GERALD STATION**

19 August 2016

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INTRODUCTION

Qualifications and Experience

- 1 My name is Nicola Anne Scott.
- 2 I have nineteen years of experience in the resource management field. I obtained a Bachelor of Science Degree from Massey University in 1996.
- 3 I have been employed part-time as a Planning Consultant with C. Hughes & Associates Ltd in Wanaka for the past twelve years and I am also an independent planning consultant. My Planning role in the Queenstown Lakes/Central Otago area covers the previous sixteen years. My experience in resource management matters has involved work with the Councils of Central Otago, Queenstown Lakes, Mackenzie, Southland and Westland, plus the Otago and Auckland Regional Councils.
- 4 I have previously been employed as a Planner for the Queenstown Lakes District Council and as a Resource Quality Technician with the Auckland Regional Council.
- 5 I am an Associate member of the New Zealand Planning Institute.
- 6 Through C. Hughes & Associates Ltd I have been involved in planning work for Mt Gerald Station, and associated companies, since 2007. This includes preparing applications for subdivision consents, land use consents and certificates of compliance from Mackenzie District Council. I also presented Planning Evidence before the Mackenzie District Council for the hearing of submissions for Proposed Plan Change 13 in 2008.

Code of Conduct

- 7 I acknowledge that I have read and am familiar with the Environment Court's Code of Conduct for Expert Witnesses, contained in the Environment Court Practice Note 2014, and agree to comply with it. My qualifications as an expert are set out above. Other than where I state that I am relying on the advice of another person, I confirm that the issues addressed in this statement of evidence are within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

SCOPE OF EVIDENCE

- 8 The purpose of my evidence is to produce a map of Mount Gerald Station which identifies a number of features as outlined below.

MAP OF MOUNT GERALD STATION

- 9 When considering the impact of the proposed Plan Change 13 ("PC13") provisions on a farming station, it is relevant to consider those provisions in the context of other restrictions that already apply.
- 10 To demonstrate the different layers of control that apply to Mt Gerald Station Limited a series of four maps have been prepared of Mt Gerald Station which are attached to my evidence as **Annexure A**. These maps identify:
- 10.1 The new Scenic Grasslands Area proposed by the Council.
 - 10.2 The land within 1km of Lilybank Road, on the basis that I understand additional controls are proposed to apply within tussock grasslands within this area under PC13.
 - 10.3 The land above 900m, which is subject to existing controls in the District Plan. Within this area there are rules restricting buildings, earthworks, tree planting and clearance of indigenous vegetation.
 - 10.4 The Lakeside Protection Area.
 - 10.5 The Sites of Natural Significance as set out in the District Plan.
 - 10.6 The Farm Base Area on Mount Gerald as set out in the District Plan.
 - 10.7 Areas that have been restored to or retained in full Crown ownership and control as conservation area under Section 35(2)(a)(i) Crown Pastoral Land Act 1998.
- 11 The maps were prepared by a Registered Professional Surveyor at C. Hughes & Associates Limited based on planning information provided by myself.