

**BEFORE INDEPENDENT HEARING COMMISSIONERS APPOINTED BY THE
KAIKOURA DISTRICT COUNCIL**

IN THE MATTER OF

The Resource Management Act 1991 (**RMA** or
the Act)

AND

IN THE MATTER OF

Proposed Plan Change 4 (**PC4**) to the Kaikoura
District Plan (**KDP** or **the Plan**) brought by
Kaikoura Business Park Limited (**KBP**)

AND

IN THE MATTER OF

The Hearing of Submissions and Further
Submissions on PC4

**EVIDENCE OF MORGAN TRACY-MINES FOR THE APPLICANT
KAIKOURA BUSINESS PARK LIMITED**

Dated: 11 March 2024

Presented for filing by:
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INTRODUCTION

- 1 My name is Dr Morgan Lee Tracy-Mines.
- 2 I am employed as a Vegetation Ecologist at Wildland Consultants Ltd's Christchurch office, an ecological consultancy with offices throughout New Zealand.
- 3 I hold the qualifications of Doctor of Philosophy in Biological Sciences, and I am a member of New Zealand Plant Conservation Society.
- 4 I have over 6 years' experience in researching vegetation ecology and botany throughout the Canterbury region. This includes species identification and habitat mapping in many different ecosystems, including farmland, braided rivers, tussock grasslands, plains, forests, and scrub/shrublands. I am a recipient of the Bill Makepeace Prize in Botany.
- 5 I frequently prepare ecological assessments, including assessments of ecological effects, for resource consent applications.
- 6 I have read the Environment Court's Code of Conduct and agree to comply with it. My qualifications as an expert are set out above. The matters addressed in my evidence are within my area of expertise, however where I make statements on issues that are not in my area of expertise, I will state whose evidence I have relied upon. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed in my evidence.

SCOPE OF EVIDENCE

- 7 In my evidence I address the following issues:
 - (a) Determining the presence and extent of any wetland habitat and assessing it using definitions and methods required by the National Policy Statement for Freshwater Management (NPS-FM; 2020).
 - (b) Determining the presence of indigenous vegetation and habitat of indigenous fauna.

- (c) Assessing the potential impacts of the proposed rezoning against the National Policy Statement for Indigenous Biodiversity (NPS-IB).
- (d) Assessing the ecological significance of the site against both the NPS-IB (Appendix 1 criteria) and the Canterbury Regional Policy Statement (Appendix 3 criteria).

CONTEXT

- 8 I understand that under s73(2) of the Resource Management Act 1991 (RMA), Kaikōura Business Park Ltd (“the Applicant”) requests a change to the Kaikōura District Plan (KDP), to re-zone approximately 21.6 ha of rural land located at 69 Inland Kaikōura Road, Peketā, to a new proposed ‘Light Industrial Zone’. This plan change will allow the rural pastoral land to be developed into a business park.
- 9 This evidence relates to land legally described as Lot 2 DP 501321 & approved Lot 20 SU-2021-1765-00 and commonly known as 69 Inland Kaikōura Road Peketā, Kaikōura.
- 10 I affirm the contents of the following attached report(s):
- (a) Ecological constraints analysis for Kaikōura Business Park proposed rezoning dated 1 March 2024, attached as **Appendix 1**.
- 11 I was the lead author of this report but other experts at Wildlands contributed to this by conducting some of the surveys contained in the report.
- 12 The qualifications of the other authors are:
- (a) Dr Della Bennet – Doctor of Philosophy in Biological Sciences with over 15 years of experience as an avifauna specialist.
 - (b) Dr Vikki Smith – Doctor of Philosophy in Ecology with over seven years of experience as an entomologist.
 - (c) Jess Randall – Bachelors of Science (Honours) in Ecology with over five years of experience as an ecologist.
 - (d) Dr Justyna Giejsztowt – Doctor of Philosophy in Ecology and Biodiversity with over ten years of experience as an ecologist.

THE PROPOSAL FOR REZONING

- 13 The site is currently zoned Rural and was previously used for farming. The surrounding sites are also zoned Rural, including those on the other side of State Highway 1, and the Inland Kaikōura Road. To the east, on the other side of the Inland Kaikōura Road is the Kowhai River. The ocean is approximately 350 metres to the south of the site.
- 14 The size and shape of individual sites within the new zone have not been finalised; however, the Applicant has provided an Outline Development Plan which also shows the realignment of the Inland Kaikōura Road.
- 15 There will be internal roading within the site to access individual sites. The sites within the new Light Industrial Zone could be any size and the location of the internal roading has not been finalised; however, sites may typically be in the range of 0.2 – 2.0 hectares.
- 16 The zone anticipates light industrial activities, with commercial and retail activities also permitted and expected in the zone.

Dr Morgan Lee Tracy-Mines



Date: 11 March 2024