



RM240115 – Updated Ecological Management Plan Review for 597 Horahora Road

Prepared for:	South Waikato District Council	Reviewed and approved for release by:  Nick Goldwater Senior Principal Ecologist
Author:	Sarah Budd	
Report No:	7550a-iii	
Date:	September 2026	

1.0 Introduction

Kevin and Lynn Tylee (the applicants) have applied for resource consent to develop a residential subdivision at 597 Horahora Road, Arapuni. An updated Ecological Management Plan (EMP) has recently been provided by the applicants (dated 17 September 2026). Wildlands has reviewed this updated EMP and feedback is provided below.

2.0 Comparison of Ecological Management Plan Versions (16 June 2026 vs 17 September 2026)

Table 1 below summarises the key differences between the 16 June 2026 and 17 September 2026 versions of the EMP. Several changes are noted.

Table 1 – Comparison of Ecological Management Plans provided in June and September 2026.

Topic	16 June 2026	17 September 2026
Subdivision size	Proposed 79 lots.	Proposed 73 lots. This appears to be a correction of an error in the earlier version. The number of lots has not changed since the previous EMP version was submitted.
Additional gully area consent notices	Lots 59, 58, 50, 48, 47, 40, and 29.	Lots that will be subject to consent notices to protect and restore habitat in the additional gully areas have been reduced to Lots 58, 48 and 29 only. This also appears to be the correction of an error in the earlier report and is consistent with the scheme plan.
Additional gully description	Seven lots.	Three lots. This also appears to be the correction of an error in the earlier report and is consistent with the scheme plan.
Bat boxes	Requires bat boxes if occupied roosts found in felled trees, but no specified number.	Specifies four artificial bat boxes per occupied roost felled. This is consistent with the Ecological Impact Assessment.
Pest animal control	Required, but no explicit duration.	Specifies that pest animal control must be undertaken by suitably qualified professionals “in perpetuity”.
Lizard management	No specific lizard survey, salvage or translocation considered necessary.	Includes a pre-works habitat assessment and survey where considered necessary, particularly when habitats other than grazed pasture will be affected.



Topic	16 June 2026	17 September 2026
Pest plant locations	Some descriptions only note presence outside the property (e.g. scattered along the Waikato Awa).	Control work explicitly limited to pest plants that are within the property.
Planting under poplars	Not included.	Includes additional planting under the poplar areas, spacing 1.5 to 4.0 meters depending on canopy density. However, this is not included in the bullet point list in Section 4.4 or Table 2.
Planting density	Plant spacing stated to be 0.75 to 1.5 meters.	Explicitly states spacing should be 0.75 meters in wetlands and 1.5 meters in upland areas.
Supplementary planting	Includes supplementary canopy enhancement species, planted after the early successional species have gained canopy closure.	Supplementary planting no longer proposed.
Canopy performance target	75% average canopy closure.	80% average canopy closure.
Initial watering	States that initial watering after planting is required.	Watering no longer required.

3.0 Responses to Earlier Feedback

The following sets out whether each matter raised in the ecology review memorandum dated 10 August 2026 has been adequately addressed in the material provided.

Comment 1: All areas to be protected and managed in perpetuity should be protected by a covenant rather than a consent notice.

Status: *Not addressed.*

Comment 2: The 25-metre-wide bat habitat setback has not been applied to the areas that will be planted to provide additional bat habitat. If these areas are to develop into high-value bat habitat, then the 25-metre-wide setback will also be required around these areas. Key areas that do not currently appear to have associated setbacks are Area D, part of Area AI, and Areas BA, BB, and BC.

Status: *Not addressed.*

Comment 3: The EMP does not specify the timeframe for pest plant and pest animal control. The Ecological Impact Assessment indicates that this will be “ongoing” in protected areas. The EMP should be updated to clarify that this will be the case.

Status: *Partially addressed. The EMP now specifies that pest animal control must be undertaken by suitably qualified professionals “in perpetuity”. However, a similar commitment is not provided for pest plant control.*

Comment 4: The Ecological Impact Assessment also states that one of the mitigation actions will be to “Design and implement long-term animal pest control within the subdivision and along the river margin”. The proposed work along the river margin does not yet appear to have been captured in the EMP. An indicative map of the ideal locations and spacings of pest animal control devices should be provided for clarity. It should also be made clear what the timeframes will be for pest animal control



work on the river margin. To achieve the desired results this will also need to be carried out in perpetuity (alongside the ongoing control within the site). Further information is also required regarding who will be responsible for implementing this control, and the legal mechanism for ensuring it is carried out.

Status: *Not addressed. The EMP now clarifies that pest plant control is specifically limited to the property only, not the adjacent river margin. The maps requested have not been provided and there is no mention of pest animal control being carried out in the river margin. This is not consistent with the management actions outlined in the Ecological Impact Assessment.*

Comment 5: Reference to the lighting design restrictions to minimise effects on bats will also need to be captured in a separate consent condition. This information is currently in the background and scope, and overview sections of the EMP, and could easily be missed.

Status: *N/A. This is to be addressed in consent conditions.*

Comment 6: The EMP mentions the “establishment of bat boxes” but does not specify how many will need to be installed. This should be updated to reflect the wording of the Ecological Impact Assessment, which states there should be four boxes installed for each confirmed roost that is identified during felling. Trees that contain bat boxes should also be banded to prevent climbing predators from accessing them.

Status: *Partially addressed. The number of bat boxes to be installed has been added to the EMP; however, there is still no mention of these trees being banded to prevent predators climbing them. Bat box installation should comply with the New Zealand Bat Recovery Group advice note for the use of artificial bat roosts¹.*

Comment 7: The lizard management section of the EMP only includes an incidental discovery protocol. This should be updated to include a pre-works assessment of habitat values and associated lizard survey, if required. The staging of works means that a substantial period may pass between consent being granted and works occurring. If grass is allowed to grow rank, or debris piles accumulate at the site, then the habitat value for indigenous skinks could increase substantially over a relatively short period.

Status: *Addressed. The EMP now includes a pre-works habitat assessment and survey where works will affect habitats other than grazed pasture.*

Comment 8: The EMP does not include planting recommendations to enhance existing areas of poplar forest. It seems likely that some gaps will be created in these areas as a result of pest plant control and that planting may be required to fill these gaps. This should be clarified in the EMP.

Status: *Addressed. The EMP now states that “additional planting will occur under the poplar areas. This additional planting will be determined onsite, and plants should be spaced between 1.5 and 4 metres apart, depending on the canopy density”.*

Comment 9: The staged approach of adding supplementary canopy tree species to revegetation areas at a later date is not recommended as such actions are often more difficult to enforce. In addition, the closed canopy conditions that facilitate the successful establishment of more sensitive species are not likely to be achieved for many years.

Status: *Addressed. Staged planting is no longer proposed.*

¹ <https://www.doc.govt.nz/globalassets/documents/conservation/native-animals/bats/bat-recovery/artificial-bat-roosts-advice-notes.pdf>



Comment 10: More clarity should be provided regarding where a plant spacing of 0.75 metres is appropriate. This should be limited to wetland areas where sedges and harakeke can be planted closer together. Plants in dry areas should be planted at 1.5-metre centres. The plant number table should be updated to reflect this.

Status: *Addressed. Clarity provided in Section 4.4.2.*

Comment 11: Planting work should also be limited to the generally accepted planting season (May to September inclusive), which would mean that “initial watering” should not be required.

Status: *Addressed. Watering has been removed from the methodology, and recommendations for the timing of planting are appropriate.*

Comment 12: Performance criteria for plant establishment should include an average of 80% canopy closure, not 75% as currently stated.

Status: *Addressed. Performance standard is now 80% canopy closure.*

