RM240115: 597 Horahora Road – Verbal Summary of Ecological Review

Prepared for:	South Waikato District Council	Presented by:	
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1.0 Introduction

Wildlands was engaged by the Council to peer review the applicant's ecological material for the proposed subdivision.

In April 2025, we were provided with an assessment of effects on long-tailed bats, which was reviewed by my colleague, Brent Henry. Overall, the assessment was considered accurate and adequate. Through actions such as the design and implementation of long-term animal pest control within the subdivision and along the river margin it appeared there would be an overall net gain for the bat population, although further information was requested regarding the effects of car headlights on individual bats.

In May 2025, a wetland assessment prepared by 2 Awa Ecology was provided and reviewed by me. The report was approximately two and a half years old at the time, so I considered it out of date and recommended that it be updated. I also noted that a detailed Ecological Impact Assessment covering all habitats, fauna, and the Waikato River margin had not yet been provided. I therefore requested that a comprehensive ecological impact assessment be undertaken.

A detailed Ecological Impact Assessment was provided in July 2025. The assessment and the proposed effects management measures provided in that report are appropriate. As very little vegetation is proposed to be cleared, and most of the existing vegetation within the property boundary is to be retained and protected, the ecological effects are relatively limited. Overall, the application appeared to provide a clear net gain in ecological values as it was stated in the Ecological Impact Assessment that the package would include pest animal control within the adjacent river margin habitats. However, I considered that a small number of matters required clarification, the most important being the preparation of an Ecological Management Plan, or EMP.

As you know, following feedback from submitters, the scheme was revised and the number of lots reduced. The revised plan provided better ecological outcomes than the original design, as the lower housing density allows for more indigenous planting. Pest animal control within the river margin was also still included as part of the overall package. A draft EMP was also submitted, and I requested some amendments.

Most of the matters that I raised during the review have now been resolved through an updated draft EMP and the evidence of Mr Kessels.

The outstanding matters relate to the mechanism for ensuring the ongoing management of ecological areas, the management of river margin habitats, and lizard management activities.

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2.0 Protection mechanisms

In my earlier feedback, I expressed a preference for covenants rather than consent notices. Covenants are often the preferred mechanism for protecting ecological values by other councils I have worked with. While I acknowledge that I am not a property law specialist or a planner, my understanding is that this preference relates primarily to the fact that covenants can be more difficult to remove from a property title and may place a lower enforcement burden on the Council.

I am happy to leave the decision on the most appropriate protection mechanism for this application to the planning specialists.

3.0 River margin management

There is some inconsistency between the information provided in the application documents and what is proposed in relation to the river margin. Both the Ecological Impact Assessment and Mr Kessels' evidence refer to the management of river margin habitats.

The Ecological Impact Assessment states that one of the proposed consent conditions to protect bat habitat will require the applicant to:

"*Design and implement long-term animal pest control within the subdivision and along the river margin.*"

Mr Kessels' primary evidence indicates that the river margin is the responsibility of other parties, but also continues to state that the application:

"*Creates an opportunity for a net biodiversity gain through restoration of the gully, wetland and river-margin habitats*."

His concluding statement yesterday also referred to the enhancement of river margin habitats, stating that:

"*Bat habitat along the awa and gully, the wetland, the tributary and the river margins are all avoided, legally protected in perpetuity and enhanced*."

I also note that Mr Lang indicated yesterday morning that the protection and enhancement of the river margin formed part of how the application would give effect to Te Ture Whaimana o Te Awa o Waikato.

However, it now appears that enhancement of the river margin is not proposed as part of the application. Mr Moule described it yesterday afternoon as being "outside the applicant's control" and "not a matter for this proceeding".

If that is the case, it is surprising that it has been consistently included in the different versions of the ecological impact assessment reports. Further information should be provided on how removing river margin enhancement activities from the proposal affects the overall ecological impact assessment. In particular, does the application still achieve a net gain in ecological values.

I also note that not carrying out pest control in the river margin will limit the positive outcomes that can be achieved through pest control within the site, as pest will continue to invade from the river margin area.

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4.0 Lizard management

Regarding lizard management, I agree with Mr Kessels' assessment that actively grazed pasture provides negligible habitat for indigenous lizards. However, habitat values for copper skinks could improve relatively quickly if stock are removed and the grass is allowed to grow rank before works commence.

Pre-works habitat assessments should therefore be undertaken for each stage to check habitat values in areas that have not been grazed recently. The wording in the draft EMP should be strengthened to clarify this requirement.

The current draft EMP states that "*a pre-works habitat assessment and survey should be undertaken where considered necessary*". Specific criteria or triggers for determining when these assessments are required should be included.

5.0 Implementation of the EMP across development stages and landowner pest control

Lastly, picking up on some of the discussions from yesterday and earlier today, I would like to comment on how the EMP will apply across the different stages of development and how pest control will be carried out by the different landowners.

The EMP already states that ecological planting will be carried out in Stage 1. The reason for this provided in the EMP is to "*ensure that the new bat foraging and commuting vegetation in the protected areas is established well ahead of the development affecting bat habitat in High Value habitats and restoration areas in Stages 2 and 3*".

I support this approach and have recommended that this requirement be specified in the consent conditions. It would also make sense for pest control to begin in these areas at the same time. Pest plant control, in particular, will be necessary to maintain the planting areas and ensure the successful establishment of the planted trees and shrubs.

Regarding the ongoing pest animal control, allowing individual landowners flexibility in how they undertake pest animal control, as mentioned yesterday, could reduce the effectiveness of control across the site as a whole. For example, baiting or trapping at different times on different properties could compromise the effectiveness by creating gaps in the control network at any given time.

The EMP should therefore clearly describe the pest control methods and timing, including the locations of control devices. This will help ensure that each landowner's responsibilities are clear and enforceable.

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