



RM240115 – Ecology Review of Revised Development Plan at 597 Horahora Road

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1.0 Introduction

Kevin and Lynn Tylee (the applicants) have applied for resource consent to develop a residential subdivision at 597 Horahora Road, Arapuni. Following submitter feedback, the applicants revised the subdivision plan, including a reduction in the number of residential lots from 81 to 73.

Wildlands has reviewed the updated Ecological Impact Assessment (EclA) and can confirm that the revised plan will result in improved ecological outcomes compared to the earlier version. This is largely due to the increased extent of indigenous planting that has been made possible by the reduced lot density.

The Ecological Management Plan (EMP) and associated scheme plans have also been reviewed and feedback on these documents is provided below.

2.0 Ecological Review Comment

- All areas to be protected and managed in perpetuity should be protected by a covenant rather than a consent notice.
- 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.
- The EMP does not specify the timeframe for pest plant and pest animal control. The EclA indicates that this will be “ongoing” in protected areas. The EMP should be updated to clarify that this will be the case.
- The EclA 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.
- 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.



- 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 EclA, 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.
- 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.
- 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.
- 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.
- 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.
- Planting work should also be limited to the generally accepted planting season (May to September), which would mean that “*initial watering*” should not be required.
- Performance criteria for plant establishment should include an average of 80% canopy closure, not 75% as currently stated.

