

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of a submission in respect of the **PROPOSED WAIKATO DISTRICT PLAN** by **AMBURY PROPERTIES LIMITED** pursuant to Clause 6 of Schedule 1 of the Act seeking the rezoning of land at Ohinewai

SUMMARY STATEMENT OF CHAD DONALD CROFT

1. My name is Chad Donald Croft. I am employed as Principal Ecologist by a specialist ecological consulting firm, Ecology New Zealand Ltd. I prepared a statement of evidence dated 9 July 2020, and a statement of rebuttal evidence dated 24 August 2020. The purpose of this document is to summarise those statements.
2. I outlined my qualifications, experience and commitment to comply with the Environment Court Expert Witness code of conduct in my evidence in chief ("EIC").
3. The Site is situated between the Waikato River to the west, Lake Ōhinewai to the south and Lakes Rotokawau and Waikare to the east.
4. The Site encompasses a highly modified agricultural landscape composed of dry stock pasture areas, with no original indigenous vegetation communities remaining. The Site contains both terrestrial and aquatic habitats of generally low value. Aquatic habitats include farm drainage channels located throughout the property providing ground water drainage across much of the Site. These channels discharge to the Balemi Rd and Tahuna Rd drainage channels adjacent to the development area (i.e. the Site) which form part of a large surface water management scheme managed by Waikato Regional Council ("WRC") as part of the Franklin-Waikato Drainage Scheme (Waikare drainage area, West subdivision).
5. Terrestrial habitats include both exotic and indigenous vegetation communities, suitable for commonly occurring bird species which prefer open country and aquatic margin habitats, as well as indigenous lizards and bats.

6. The potential presence on-site of At Risk and Threatened native fauna species (e.g. black mudfish and bats) has increased the assessed ecological value of the area. The presence and utilisation of the Site by these species is currently uncertain and there are no other high value ecological features that will be adversely impacted within the Site. The potential presence of these species nevertheless makes it necessary to consider the means by which potential adverse effects of the proposed development, that would be enabled by the rezoning, can be avoided or mitigated.
7. Although the risk of actual significant adverse ecological effects is considered low, appropriate recommendations have been made to avoid and mitigate those possible effects at the time of future development. The recommended ecological management measures will decrease the risk of adverse impacts on any potential high value features. Consequently, the overall level of ecological impact for the project is considered to be low.
8. Expert conferencing with WRC, Waikato District Council ("WDC") and Fish and Game confirmed that there is agreement on most of the points raised regarding the following:
 9. The values of the Lake Rotokawau Reserve were agreed to be significant.
 10. The ecological values of the Lake Rotokawau Reserve were agreed to be sufficiently significant to justify a predator control framework to control domestic cats and dogs within the APL – Ohinewai Structure Plan area ("OSPA").
 11. It was agreed fish management planning may not be able to adequately address the potential effects of development within the OSPA, on black mudfish, if present.
 12. It was agreed that the determination of whether the rezoning will provide for an improvement in water quality leaving the site and discharging to Lake Rotokawau and Lake Waikare should be made by experts for stormwater and wastewater design and management.
 13. There was disagreement on whether the waterways on-site had been classified correctly as artificial drains.
 14. It was agreed experts would reconvene to discuss options available for controlling dogs and cats.

15. APL has developed a conceptual Predator Control Programme (PCP) and has shared draft versions with Mr Klee (Auckland/Waikato Fish and Game) for comment as per the agreed conferencing outcomes.
16. The draft PCP aims to fulfil the requirements of proposed Rule 16.6.3 RD5(d)
17. The PCP remains conceptual at this stage because of the temporal dynamics between the plan change decision, resource consenting and development and the rate of knowledge advancement in predator-prey dynamics and predator control programming in peri-urban environments.
18. The PCP design utilises a lethal trapping and baiting network with signage and outreach to increase awareness. A lethal approach over a no-cat covenant was preferred due to increased certainty in outcomes and ability to scale up in partnership with DOC, Tangata Whenua or community groups operating neighbouring existing and future PCP programmes.
19. No cat covenants are a specific administrative mechanism aimed at excluding cats from a particular area. Administrative controls aimed at individual landowner behaviour specifically can be difficult to monitor and ensure compliance. In the absence of compliance with a no-cat covenant, cats may be introduced to the OSP area with no controls in place to manage their potential effects on native fauna. In my opinion, native fauna disturbance by cats is most appropriately mitigated through increasing 'safe sites' in the area through the implementation of a predator control area.
20. In my view, there are positive outcomes provided by the retiring of the existing dairy farm and extensive provision of open space and restored wetland habitat. The recommendations presented for avoiding or mitigating the effects of the development are appropriate and conceptually sound to enable the proposed re-zoning to be approved. Those recommendations have been formulated into proposed plan provisions as outlined in John Olliver's evidence.

Chad Croft
9 September 2020