



## Memorandum

To	Katherine Overwater
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From	John Turner
Office	Hamilton
Date	24 September 2020
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Subject	Rural Topic Hearing 18: Response to ecological questions for rebuttal evidence

This memo provides my responses to your questions concerning ecological matters in connection with the rural topic (Hearing 18) and in particular the ecological evidence submitted by Dr Vaughan Keesing for Middlemiss Farm Holdings Limited and the Buckland Landowners Group.

### **Q1 Is there value in protecting features not identified as Significant Natural Areas (SNA's)?**

All vegetation and habitat, no matter how modified or degraded, has some ecological value. The value of any given area of vegetation or habitat lies on a continuum from extremely high to minimal, dependent upon a wide range of biological and physical variables. Within the Waikato District those areas of vegetation or habitat worthy of meeting a recognisable level of value are those meeting the criteria listed in Section 11A of the Waikato Regional Policy Statement (WRPS), as included in Appendix 2 of the Proposed District Plan as "Criteria for determining Significance of Indigenous Biodiversity". If the intent of incentivizing subdivision is to provide for greater protection and enhancement of biodiversity within the Waikato District in a meaningful way, then focusing on those areas that meet recognised and agreed minimum criteria seems to me to provides an appropriate focus.

Based on my recent site visits across the District as part of the District Plan review work connected with the SNA hearing topic (Hearing 21A) and having lived and worked as an ecologist in Hamilton and the surrounding district over the past 20 years, it is clear that while many SNA's are being enhanced and protected by property owners, greater incentivisation to provide protection and enhancement of the best of what remains in private ownership within the District would be highly beneficial.

While there may be some merit in protecting vegetation and habitats that do not meet the criteria of section 11A of the WRPS, it becomes challenging to define what is worthy of protection and what is not. There is a significant risk that only smaller areas of very low quality and value become the basis for justifying subdivision.

In saying this, I note that there are still areas within the District that meet the Section 11A criteria and which are not currently identified as SNA's. However, from my understanding of the recommend rules included in the S42A report, there is nothing stopping such sites from being assessed by a suitably qualified ecologist against the criteria and if the indigenous vegetation or

wetland area meets the criteria in Appendix 2, it may be used as a basis for subdivision. Furthermore, the proposed Rule 22.4.1.6 D1 (a) provides the opportunity to undertake revegetation planting to enable smaller areas of existing SNA to meet the minimum area requirements.

**Q2 Is there merit in dropping the wetland size threshold down to 0.5ha?**

I think that there is merit in reducing the size threshold for wetlands down to 0.5ha. Wetlands are a particularly diminished resource within the Waikato District. Furthermore, small wetland areas can have high ecological values. However, if the threshold is to be lowered from the thresholds already recommended in the S42A report then the wetland area in question must meet criteria 6 of the WRPS and in particular "*It is wetland habitat for indigenous plant communities and/or indigenous fauna communities*".

There has been a tendency for ecologists in recent years to set the bar for what constitutes a significant wetland extremely low i.e. wet pasture entirely dominated by pasture grasses and exotic pastoral weeds to be defined as wetland, albeit having low value. In my opinion such habitats should not provide the basis for granting subdivision unless it could be demonstrated that it provided an important habitat for native wetland birds or fish. Subdivision should only be granted for wetlands that are dominated by native plant species and/or provide regular or permanent habitat for native wetland fauna.