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15 October 2024

Waitomo District Plan Review
Waitomo District Council

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Dear Greg Hill (Chairperson),

Waikato Regional Council Staff Submission on the Ecosystems and Indigenous Biodiversity Topic of the Proposed Waitomo District Plan

1. I request that this letter is tabled at the second tranche of hearings for the Proposed Waitomo District Plan on 27 November 2024, confirming Waikato Regional Council's (WRC) position on the recommendations presented in the Ecosystems and Indigenous Biodiversity Section 42A hearing report.
2. WRC lodged a submission on the Proposed Waitomo District Plan. In summary and regarding the Ecosystems and Indigenous Biodiversity Topic, the submission sought:
 - (a) Amendments to strengthen recognition, protection and enhancement of Significant Natural Areas (SNAs) across all categories
 - (b) Greater clarity for plan users when interpreting "limited circumstances" and "sustainable quantities" of vegetation removal in SNAs, as well as for management of vegetation outside SNAs
 - (c) Amendments to ensure pest control is not limited to pests listed under the Waikato Regional Pest Management Plan
 - (d) The addition of Bat Protection Areas (BPA) and provisions
 - (e) Minor text amendments to Schedule 6 to strengthen connections with the WRC list of Top 58 karst sites
 - (f) The addition of a site of tainui, New Zealand hazel, into Schedule 6.
3. WRC staff support the recommendations made by the author of the Ecosystems and Indigenous Biodiversity section 42A report in connection with WRC's submission points on the topic.
4. In particular, we support:
 - (a) The inclusion of an advice note above the table in Schedule 6, stating that further information relating to the biodiversity values of each SNA site is available on request, including a link to the approach for requesting this information
 - (b) The recommended amendment to ECO-P2.2 which clarifies that vegetation removal should only occur in sustainable quantities across all levels of SNA, and recommended changes to the ECO rules which resolve confusion about vegetation removal limits over the lifetime of the plan

- (c) The recommended amendment to ECO-P3.5 that more clearly reflect the limited circumstances where vegetation removal in a SNA is permitted
 - (d) The recommended amendments to the definition for Conservation Activities and ECO rules regarding the scope and management of nuisance plant and pest species
 - (e) That Waitomo District Council collaborates with WRC and the Department of Conservation to create a fact sheet on highly mobile fauna, including bats. Additionally, that the plan will be amended to incorporate bat habitat identified by WRC in the future.
5. Further, we appreciate and concur with the justifications provided for WRC submission points which were rejected.
6. Regarding matters which have been referred to an ecologist, WRC continues to advocate for the inclusion of the property at 5443 State Highway 3, Mokau, into Schedule 6. This site is identified as containing the New Zealand hazel plant species (*Pomaderris tainui* Hector; *Pomaderris apetala*), which is a very rare, nationally critically endangered indigenous plant, that triggers criteria 3 within the WRPS APP5 – Criteria for determining significance of Indigenous Biodiversity.
7. In conclusion:
- (a) WRC is in general support of the Ecosystems and Indigenous biodiversity section 42A report author's recommendations and does not consider it necessary to be heard at the hearing.
 - (b) WRC continues to advocate for the inclusion of the property containing New Zealand hazel plant species at 5443 State Highway 3, Mokau, into Schedule 6.

Please note that should the Section 42A author for Waitomo District Council change their position or recommendations on the above, WRC's position outlined in this letter may be subject to change.

Should the hearings panel have any queries regarding the content of this letter please contact Sarah Knott – Policy Advisor, Policy Implementation on (07) 949 7503 or by email Sarah.Knott@waikatoregion.govt.nz.

Yours sincerely,



Lisette Balsom
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