



01 November 2024

Waitomo District Council
c/- Cathy O'Callahan
Via email

Our Ref: WTDC.00550

Dear Cathy,

Review of SNA related submissions to the proposed Waitomo District Plan

This letter outlines my review of submissions made to the Proposed Waitomo District Plan (PDP) in relation to Significant Natural Areas (SNAs).

Experience & background

As a qualified ecologist I have been involved in assessing SNAs and assisting in biodiversity policy and regulation analysis/development for territorial authorities and private landowners, primarily under the provisions of section 6(c) and sections 30 and 31 of the RMA, since 1993. Local and regional authorities that I have assisted in this process include: Hauraki District Council; Franklin District Council; Papakura District Council; Ruapehu District Council; Waikato Regional Council; Auckland Regional Council; Auckland City Council; Auckland Council; Kapiti Coast District Council; Waipa District Council; Waitomo District Council; Waikato District Council; Hamilton City Council; Thames-Coromandel District Council and Central Hawkes Bay District Council. I have also acted as the Waikato Regional Representative for the QEII National Trust from 1998 until 2004 which included the Waitomo District.

I have provided ecological and biodiversity policy advice to Waitomo District Council on areas of significant indigenous vegetation and significant habitats of indigenous fauna since 2017.

I have provided specialist advice to the Waikato Regional Council (WRC) on protecting and managing karst ecosystems since 2017.

In relation to the PDP, I have prepared SNA assessments and technical assistance to mapping, associated reports, participated in workshops, undertaken site visits and landowner consultation, and assisted with advice to inform preparation of the PDP.

1 KiwiRail: Submission number 51.51

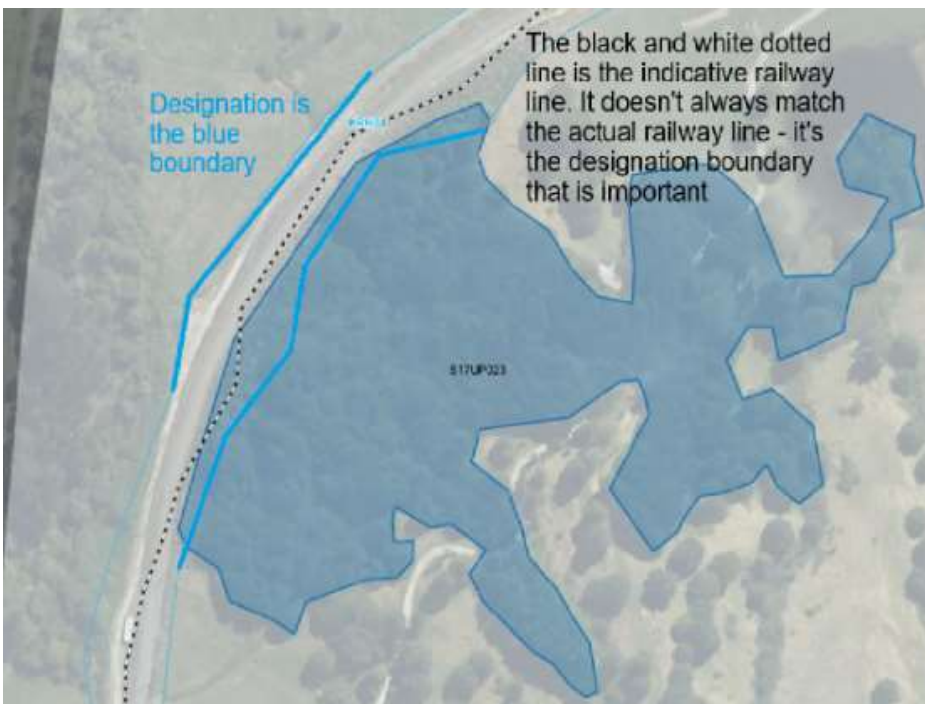
I have reviewed the SNAs which KiwiRail has concerns about as outlined in their submission. My recommendations are outlined below.

1.1 S17UP023

Oblique imagery from 2017 shows that vegetation within the designation is a mix of native and exotic vegetation and appears to have a recent history of modification and is not SNA.



Recommendation: change boundary to match designation boundary as per image below.



1.2 S17UP152

Oblique imagery from 2017 and more recent satellite imagery shows that this area within the designation contains secondary to advanced secondary scrub, including mature kahikatea, and should be SNA. Some areas of deciduous exotic trees are present (circled in pink in image below).

Recommendation: Make minor changes to remove deciduous exotic trees at western end and one in centre (use winter satellite imagery to see deciduous trees). The eastern end likely has wetlands so would need to ground truth before deleting those areas of exotic trees. There is also some blackberry present along the margins of the train tracks and these areas can be deleted.



1.3 S16076

Google street view 08/2024 shows that most of this site is weedy and dominated by pampas, blackberry, privet, buddleia, gorse and deciduous exotic trees. The area has occasional tree ferns and a narrow band of indigenous broadleaved shrubs running through the centre. Mature totara are present at the southern end of the SNA adjacent to the bridge. The western side of the bridge is tree fern scrub.

Recommendation: In the northern-most area adjust the SNA boundary to the designation (pink lines on image below). No change to eastern side of bridge (pink). Will need to ground truth the southern end by the rail bridge to check whether this can be adjusted to the designation (circled in yellow) - oblique imagery is too poor and there is no street view imagery to check whether there are mature trees within the designation. See images below.



2017 oblique imagery:



Looking south



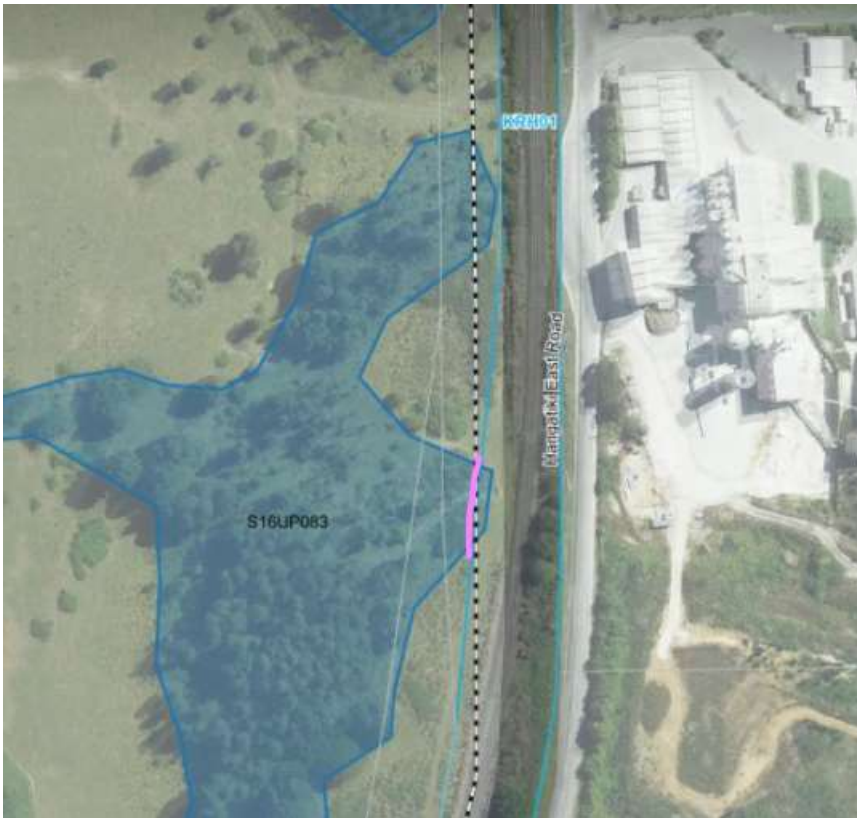
Looking east



Looking west

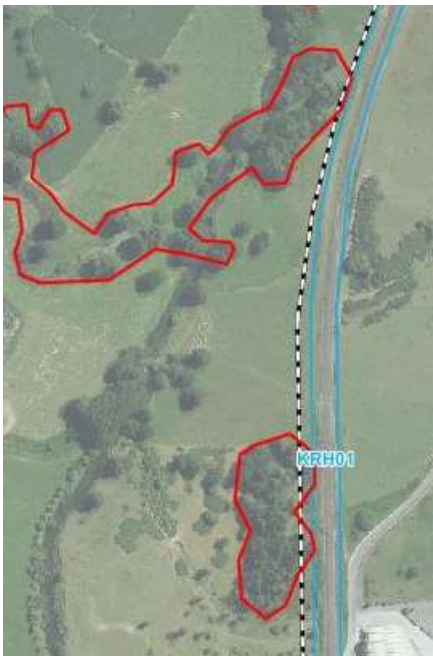
1.3 S16UP083

This is a stand of kahikatea. Aerial imagery indicates that there are no kahikatea within the designation so I recommend an adjustment to the SNA along the designation (pink line) on aerial photo below.



1.4 S16UP059

These are stands of kahikatea trees, some of which are very close to the train tracks. The southern stand crosses into the designation but the northern stand doesn't appear to.



Recommendation: no change.



Southern stand. Imagery from 2017 looking south.





Northern stand. Imagery from 2017.

2 Stokes: Submission number 06.01/06.02

The submitter has asked for a relatively small area of part SNA R16UP040 to be removed. The SNA is made up of 2 separate areas of bush with a grass between them and hence the request removal of criteria number 5 from R16UP040.

I have reviewed the request and agree with the submitter that the smaller of these two areas can be removed as it is more characteristic of treeland rather than forest as such. However, the SNA is over karst, so the larger are should remain as an SNA as criterion 5 applies.

3 WRC: Submission number 10.157 10.157

WRC have requested that the attribute tables for the following SNA include Criterion 5 from the WRPS Table 28 (Criteria for determining significance of indigenous biodiversity) in the 'Criteria' column: • R16092 • R16094.02 • 16P17037 • 16UP055.04 • 1870439.03 • 16UP074.01 • 17UP143.01. The listed sites are karst ecosystems and therefore, criterion 5 from Table 28 in the WRPS applies and should be recognised in Schedule.

I agree. These are SNA sites which sit with karst landscapes.

4 WRC: Submission number 10.160

WRC contend that this site should be listed in Schedule 6 as an SNA, given its significant ecological value. The subject site contains specimens of the nationally critically endangered indigenous plant species Tainui, New Zealand Hazel plant species (*Pomaderris tainui* Hector; *Pomaderris apetala*), which is a very rare species, that has only been identified at two sites in Waitomo (this site and the Tainui Scenic Reserve, SNA number R18001).

I do not have enough information to support inclusion of this site. At this point it time it doesn't appear to be sufficiently large enough or structurally intact to provide functional habitat for this species. I note it is on private land, and the landowners would require consultation in compliance with the NPS-IB before an SNA is to be considered. I would also require a site visit before being able to provide further advice.

5 WRC: Submission number 10.156

WRC request that Marokopa River natural tunnel and Te Ana Kapiti Cave, Mangaorongo limestone gorge and natural bridges, and Ruakuri Cave be demarcated as SNAs.

I understand that Marokopa River natural tunnel and Te Ana Kapiti Cave are delineated as ONFs (ONF39 (category B)), already contained in SNA R16037, and in the Karst Overlay and subject to the cultural alert layer. These are scenic reserves (Reserves Act 1977) administered by DoC. I do not consider any further SNA demarcation is required in this context of several layers of protection already afforded by the PDP and current administration by DoC.

I understand that the Mangaorongo limestone gorge and natural bridges are already ONFs (ONF28 (category B)), and already contained in in an SNA R17074. The Ten Acre Tomo System is also an ONF (ONF60 (category A)). I do not consider any further SNA demarcation is required as several layers of protection are afforded by the PDP.

Ruakuri Cave is already ONF (ONF54 (category F)), already in an SNA S16031, in the Karst Overlay and identified as waahi tapu. In addition, it is a scenic reserve administered by DoC. Lake Rotokawau is ONF21 (category). I do not consider any further SNA demarcation is required given several layers of protection are afforded by the PDP and current administration is by DoC.

5 Littin: Submission number 15.01

I visited this property in November 2022. On the basis of my visit, I made several amendment recommendations, which have been incorporated in the final SNA mapping layer for the PDP. However, in terms of the further areas Mr Littin is seeking removal from the SNA in his submission (which I also viewed in 2022), I cannot support the adjustment of the SNA boundary as requested. I do acknowledge that the area in question, is young , relatively immature regenerating scrub and forest, and on its own likely has low ecological value. However, these areas of regenerating indigenous scrub and forest are contiguous with a larger and valuable SNA (Whareorino Forest). Thus removing the SNA delineation on arbitrary lines as requested does not fit within the criteria I am required to consider when delineating an SNA.

6 Waitomo District Council: Submission 26.02

WDC requests the boundaries of SNA R16UP0006 (incorrectly named SNA R16UP0066 in the submission), are amended to better reflect the existing extent of indigenous vegetation with this SNA. I agree. The map below outlines the remapping required (yellow lines).



7 Taharoa Holdings Ltd: Submission 49.07

TIL (Taharoa) submitted on the SNA's at Taharoa contesting that several of the SNAs needed better definition. A qualified and experienced ecologist - Hamish Dean - has presented evidence on this matter (statement of evidence dated 21 October 2024). I have also engaged directly with Mr Dean to clarify his rationale for the changes.

On review of his evidence, and direct discussions with him, I support an alteration to SNA R16UP002 to remove the artificial water storage pond, and other minor changes to R17UP183, R16UP014.01 and R16UP015.01 to exclude non-significant areas, which will not compromise the integrity of the remaining SNA as detailed in his evidence.

Yours faithfully

Gerry Kessels - Managing Director & Principal Ecologist

Bluewattle Ecology