



Ben Tait | Senior Planner  
Williamson Water & Land Advisory

27 April 2021

Reference: Te Tai Tokerau Water Trust - MN02 Water Storage Reservoir  
Assessment of Ecological Values and Effects

Dear Ben

We have reviewed the report (MN02 Water Storage Reservoir Assessment of Ecological Values and Effects) as requested and provide comments below in response to your question regarding the level of detail being appropriate. Dr. Gary Bramley has provided his comments as a Senior Ecologist.

The report by Puhoi Stour has generally followed the Ecological Impact Assessment (EclA) process set out by the Environment Institute of Australia and New Zealand (EIANZ 2018) and considers all the relevant matters. EIANZ is the leading professional body for environmental practitioners in Australia and New Zealand and its members agree to abide by agreed professional and ethical standards. In the absence of specific details about the construction and staging, the assessment has taken a precautionary approach, which is appropriate.

The report has made use of appropriate databases, regional and district plans, and a site visit to inform their conclusions, which seem reasonable based on my (limited) knowledge of the site and the Kaikohe/Kerikeri Ecological Districts where the project is located. The amount of survey effort and range of survey types is appropriate given the scale of the project and the type of effects anticipated. Standard recognised survey methods have been used, although they haven't specified whether their wetland delineation used the Ministry for the Environment guidelines (2020).

The NPS-FM framework requires application of the mitigation hierarchy, which is not explicit in the report - instead a comprehensive range of offset options is provided. Although the project is constrained by the location of the resource, a full consideration of options to avoid, minimise, remedy and mitigate should be provided. Although it talks about "compensation" it doesn't articulate what aspects (if any) of what they propose are intended as compensation (or whether in fact compensation is required and if so for what).

The report recommends the following management plans be used to address ecological effects:

- Avian Management Plan
- Lizard Management Plan
- Offset and Compensation Plan
- Vegetation Removal Plan (to protect bats)
- Water Quality Management Plan
- Eel migration Management Plan

Consultation

HAIL Reports

Ecological Assessments

Resource Consent Applications

Compliance Monitoring

Water Quality Monitoring

Environmental Management

Pest Reduction Advice

Enrichment Planting

Restoration Advice

Not all of those would necessarily be required (e.g. bats and lizards may not be present, eel migration may not be affected (depending on construction methodology), NI brown kiwi may not be using the area). On that basis, given the low risk that these species are present/would be affected, I would recommend the client address these matters by a type of "accidental discovery protocol" in the conditions, or else additional survey work prior to construction commencing in order to confirm presence of species (preferably the latter). The additional survey work required would be addressed via conditions that set out what is required and a threshold (in this case probably detection of any individuals or sign of individuals) which then triggers the preparation of a plan, rather than go to the trouble and expense of preparing/ implementing all those plans in advance when they may not be needed. For example, half a day with a kiwi dog would probably be enough to know whether you have to manage kiwi or not. Most, if not all, adverse effects on bird species could be addressed by pest control in similar habitats without the need for specific on-site monitoring and management via a management plan. The same is likely true for lizards.

Overall, the report isn't too over the top in terms of identifying the species and effects. The management responses may well be rationalized with further information. There isn't a lot of detail about how the offset will be achieved, and if it is to meet the intention of the NPS-FM it will require creation of wetlands so that there is no net loss of wetland area (which can't be achieved by improving other wetlands). If this is the case a wetland management plan for creation and management of those will be required.

Our recommendation is not to spend a lot of money in monitoring the offset outcomes but rather direct this money to environmental outcomes on the ground.

Yours sincerely



Tricia Scott  
Director