

**From:** Alvar Koning  
**Sent:** Friday, 30 July 2021 2:59 PM  
**To:** Darryn Shepherd <[darryn@wql.co.nz](mailto:darryn@wql.co.nz)>  
**Subject:** RE: ECAN RFI specific responses

**Attachment 4**

Hi Darryn,

Please find my response below.

**RFI 6.3-a**

During the site assessment, the Disposal Area was assessed against the National Policy Statement for Freshwater Management, 2020 (NPS-FM). The Dispersal Zone could not be classified as a natural wetland under the act.

Wetland is defined in the Resource Management Act 1991 as follows: “wetland includes permanently or intermittently wet areas, shallow water, and land water margins that support a natural ecosystem of plants and animals that are adapted to wet conditions”.

The NES and Stock Exclusion regulations apply to ‘natural wetlands’, a subset of the RMA’s broad definition of wetlands.

The NES uses the RMA definition of ‘wetland’ as a starting point, but provides for three prescribed exclusions as follows.

A natural wetland means a wetland (as defined in the Act) that is not:

- (a) a wetland constructed by artificial means (unless it was constructed to offset impacts on, or restore, an existing or former natural wetland);
- (b) a geothermal wetland;
- (c) any area of improved pasture that, at the commencement date, is dominated by (that is more than 50% of) exotic pasture species and is subject to temporary rain-derived water pooling.

**RFI 6.7-a**

During the review of available desktop information, no southern grass skink records were found within 10km from the site. The absence of rank grass and suitable cover to sustain a grass skink population together with the lack of historical records contributes to the fact that no lizard management will be required for the expansion area. The majority of the expansion area comprised bare soil and rocks that was not sufficiently imbedded in the soil to provide habitat. Southern grass skink tend to inhabit areas of rank grass with suitable cover. However, the presence of grass skink on the remainder of the site can not be ruled out. To confirm the presence of grass skink on the remainder of the site, it is recommended that a suitable lizard survey is carried out.

To satisfy the concerns that were raised in the s92 RFI it is advised that enabling works in the form of disturbance methodology is advised. This disturbance methodology would be appropriate to avoid any potential ecological impacts. This will minimise any potential wildlife habitat effects prior to works commencement.

A minimum of 14 days prior to works commencing in any specific location where low quality non-arborescent vegetation occurs, weed-eating to no lower than 150mm above ground level is to occur in areas with sufficient habitat. Removal of cut vegetation from the site is preferred, however raking of cut vegetation to outside of the works footprint is required. Seven days after weed eating of the previously disturbed area, weed eating to no lower than 100mm above ground is to occur and removal of cut vegetation must occur. The day immediately prior to or the morning of works/on-site impacts; weed eating to ground level is required and the racking of vegetation outside of the works site is required.

If initial disturbance efforts to 150mm occurs prior to 14 days (i.e. 3 weeks prior), disturbance down to 100mm must occur 7 days later, and be maintained at no lower than 100mm and no higher than 150mm. A disturbance cut to no lower than 100mm must occur 7 days prior to ‘ground level disturbance’.

These enabling works are not to occur across the entirety of the expansion area site on day 1, as this risks low quality habitat becoming available and potential wildlife re-colonising prior to works beginning. Enabling works should be

performed in sections in order to maintain the non-arborescent vegetation to an appropriate height. Enabling works is to occur within 14 days for any on-site disturbance throughout the project duration where rank grass is present.

I trust that you will find this in order.

Thank you

Regards

Alvar

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**From:** Darryn Shepherd <[darryn@wql.co.nz](mailto:darryn@wql.co.nz)>  
**Sent:** Saturday, 17 July 2021 1:37 PM  
**To:** Alvar Koning <[Alvar.Koning@ecologynz.nz](mailto:Alvar.Koning@ecologynz.nz)>  
**Subject:** ECAN RFI specific responses

Hi Alvar,

Please can you advise me

- RFI 6.3-a = confirmation this area is not a wetland as I know you have advised me as such and if it was it would of appeared on the wetland delineation map?
- RFI 6.7-a = darn cheeky question, please can you respond

Cheers

Darryn