

Your Comment on the Waikanae North Development

Please include all the contact details listed below with your comments and indicate whether you can receive further communications from us by email to substantive@fasttrack.govt.nz.

1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
Organisation name (if relevant)	Queen Elizabeth the Second National Trust		
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Email (a valid email address enables us to communicate efficiently with you)			

2. We will email you draft conditions of consent for your comment			
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Please provide your comments below, include additional pages as needed.

QEII National Trust (**QEII**) welcomes and appreciates the opportunity to comment on the substantive application for the Waikanae North Development fast-track application under section 53(2)(h) of the Fast-track Approvals Act 2024.

As set out in section 6.9.1 of the substantive application, QEII has previously provided feedback that focused on domestic animal management, sediment control measures, and clarification of mapped ecological protection areas.

Having now reviewed the substantive application (and acknowledging that an updated version of the proposed draft conditions of consent are yet to be received), QEII's primary concerns are the potential for the following to diminish the open space values present in the QEII-owned portion of Te Harakeke Swamp, and the neighbouring open space covenant:

- Sedimentation;
- Changes in water level;
- Discharges of stormwater;

- Inappropriate planting occurring in the buffer areas surrounding the Applicant-owned portion of Te Harakeke Swamp; and
- Pest control and pet management.

QEII also makes a further comment below on the method for long term protection of the proposed planting and restoration areas, including the Applicant-owned portion of Te Harakeke Swamp.

Sedimentation

QEII understands that Erosion and Sediment Control Plan (**ESCP**) prepared in support of the substantive application demonstrates a proposed approach to erosion and sediment control and proposes that a phase specific ESCP is prepared for Council certification prior to each phase of earthworks occurring.

If this approach is to be taken, QEII would appreciate if the Council, in making its decision to certify any ESCP, ensures that sedimentation levels in the QEII-owned portion of Te Harakeke Swamp are not at a level detrimental to the health of the wetland and that the activities (if approved) are not diminishing its open space values. This would also ensure the objectives of each ESCP are being met as the project progresses.

Water Levels and Stormwater

The proposed activities will result in a temporary change in groundwater level, and dewatering associated with peat removal may potentially impact on groundwater levels near wetlands. QEII encourages the Expert Panel to consider whether the duration of any water level changes is short enough so as not to have a detrimental effect on Te Harakeke Swamp.

The Stormwater Management Plan (**SMP**) applies best practice principles to treat stormwater to accepted standards prior to discharge to streams and wetlands, and the Assessment of Ecological Effects states that the stormwater management system has been designed to capture and treat the water quality volume equivalent to one third of a 50% AEP storm event. These figures represent best practice from Auckland Regional Council's Technical Publication 10, and GWRC's Water Sensitive Design guidance. Further measures will be taken for 10-year ARI storms and larger, infrequent storm events (>10-year ARI).

We encourage the Expert Panel to consider whether these proposed measures are sufficient, particularly given the expected increase in weather event severity as time goes on. Direct discharges into Te Harakeke Swamp have the potential to poison freshwater life by increasing pollutant levels; smother plant life by increasing sediment load; affect ability of fauna to feed by increasing water turbidity; disrupt water chemistry and temperature; and displace or destroy freshwater habitats and refuges. Further, sustained high water levels in wetlands can cause die back of vegetation species not suited to sustained inundation. We also encourage the Expert Panel to consider the indirect effects of future wetland management – if high water levels put neighbouring properties at risk, subsequent actions to lower water levels can cause equally catastrophic long term ecological damage.

Planting

The substantive application states that section 4.2.2.8 of the Assessment of Ecological Effects (along with the Ecological Restoration Management Plan) details wetland planting. It appears there is no section 4.2.2.8 in either of these documents, although section 5.4 of the ERMP sets out the proposed wetland restoration and enhancement. This section notes that no enhancement planting is proposed within Te Harakeke wetland as most of this wetland is already native dominated, and that buffer planting of margins, and pest plant control throughout the wetland is most critical to restoration.

Noting and accepting this, we encourage the Expert Panel to ensure that any planting taking place in the buffer areas surrounding Te Harakeke Swamp is carried out using eco-sourced species that are appropriate for the wetland and wider ecological district. Any planting occurring in these areas will likely result in those species spreading into the QEII-owned part of Te Harakeke Swamp, so these species need to be appropriate.

Pest Control and Pet Management

The language used in the Ecological Restoration Management Plan for pest plant and animal control is general and leaves a lot of discretion to pest control operators and contractors. While QEII acknowledges that reliance on industry expertise is reasonable to an extent, and that an updated version of the conditions of consent (to be released soon) may provide further detail on these points, the substantive application does not set out any objective measures that would later allow for determination of whether the required level of pest control has been carried out. We also note that the proposed pest plant and animal control does not appear to address control of mustelids (although does note that their presence will be monitored). In addition, we note the Ecological Restoration Management Plan's references to weed control are all in relation to the revegetation programme. Environmental weeds are currently present in other areas of the site and will persist and spread to neighbouring properties if not controlled. For example, existing wetland areas are heavily infested with pampas grass (*Cortaderia selloana*) which produces millions of seeds from a single plant and requires repeated control to achieve eradication. We encourage the Expert Panel to test whether the proposed approach to pest plant and animal control is sufficient.

We understand that pest animal control operations will be undertaken across the 5.8-hectare lizard release area for 10 years as outlined in the Lizard Management Plan. We encourage the Expert Panel to consider whether 10 years is sufficient given the slow breeding ecology of New Zealand lizards. We suggest that 35 years of pest control would be more appropriate.

One of the remedial, offsetting and enhancement actions is a pest plant and animal control programme in wetland and dune restoration areas, alongside the management of domestic cats and dogs. We note that domestic cat and dog control will be secured by conditions of consent and enforced through subdivision covenants and support this approach (provided those conditions and covenants are fit for purpose).

The Ecological Restoration Management Plan sets out three options for cat management. QEII would prefer a blend of these three options that secures the highest level of protection for Te Harakeke Swamp, and we encourage the Expert Panel to consider the effectiveness of these proposed measures (particularly noting that the proposed pet control boundary fence would only be constructed on the subdivision-wetland interface, and that unneutered tom cats and feral cats in particular can have significant hunting ranges). The proposed pet control boundary fence, due to

the incomplete perimeter and the likely presence of far-ranging feral cats, is unlikely to be fully effective. We suggest that the high installation and maintenance costs would be better invested in a combination of comprehensive, enduring pest animal control and subdivision covenants to preclude the presence of outdoor domestic cats.

Long Term Protection

The substantive application notes that Te Harakeke Swamp will become an area of private ecological open space. Section 4.7 notes that the Applicant proposes to retain ownership of Te Harakeke Swamp, with future options including vesting in the Council, ownership by Iwi or ownership by a Residents Association.

We encourage the Expert Panel to consider which of these future ownership options will result in the best long-term ecological outcomes for Te Harakeke Swamp. Of these options, QEII prefers vesting in the Council or ownership by Iwi.