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Tēnā koe Olivia,

Outstanding information request and issues – Ridgeburn Fast-track application.

Thank you for your email dated 7 July confirming that additional context on information gaps would be useful.

Whilst it is acknowledged that Ridgeburn has responded to some of the comments provided during pre-lodgement consultation, DOC's view is that all of the matters raised have not been fully addressed. DOC is concerned that without full information there will be limitations on advice we are required to provide to a Panel under section 51 in relation to the conservation approval sought; and to inform its broader section 53 comments. A lack of information to inform appropriate effects management strategies also limits DOC's ability to comment on the appropriateness of conditions and management plans proposed.

The information listed below is required to support DOC in meeting its statutory functions under the Fast-track Approvals Act 2024.

DOC will continue to engage with Ridgeburn on the issues raised as required. It is anticipated that further issues may be identified as we continue to draft reports and advice to support a Panel in their decision-making process.

Wildlife Approval for lizards

1. **Assessment of lizard release sites**
   An assessment of the effects of releasing lizards on current populations of lizards at Morven Hill is required. To assess this, baseline release-site survey results are required, including habitat area/quality, expected capacity, rationale for allocation of species/numbers to each release area, and a trigger for using alternative release areas if capture numbers exceed expectations.

   Clarity on whether southern grass skink habitat occurs on Morven Hill is also required.

2. **Mitigation hierarchy**
   Clarification on which lizard habitats are avoided, which cannot be avoided with reasoning why not, and what actions are proposed to minimise effects is required.

3. **Assessment of effects**
   An assessment of the effectiveness of plantings and pest control and the effect of herbicides on lizards is required.

4. **Lizard Management plan**
   The LMP lacks clear contingency responses for low salvage success, high mortality, unexpected species, unsuitable weather windows, release-site failure, predator-control

failure, or excessive capture numbers. A contingency table with triggers, actions, responsibilities, and reporting requirements could address this.

A lizard monitoring programme is required, e.g. monitoring years, methods, performance measures, success criteria, and adaptive management triggers.

Please note further lizard issues under the discussion of conditions below.

Freshwater

Blue text below is taken from our Summary of Consultation provided in March 2026. The comments below respond to how the issues raised have been addressed.

The narrative descriptions are generally sufficient to evaluate the ecological value assessments in the EcIA. However, more information is required on fish in the water race and invertebrates in the intermittent standing waters, such as the constructed ponds (especially to determine whether endangered tadpole shrimps may be present).

5. **Data on fish in the Morvern ferry Race**
   In regard to the Morvern Ferry Race, additional comments since pre-lodgement consultation have been made stating that fish are unlikely to be present, but apart from a check of the NZ Freshwater Fish Database (which yielded no records), there are still no actual data on fish in the race. Unless the water race is recently constructed and has well-designed fish screens on the intake, it is likely that some fish live in the race, possibly including koaro and longfin eel (both At Risk – Declining). However, fish diversity will very likely be low. Therefore, even if some fish are present in the race, its ecological value is likely to remain low. With respect to At Risk species potentially present, it is noted that a Fish Management Plan (FMP) is recommended to salvage any such fish. The FMP appears adequate to salvage most fish that may be present.

6. **Possible presence of tadpole shrimps in the constructed ponds**
   The possible presence of tadpole shrimps in the constructed ponds has been acknowledged, though the likelihood of this species occurring is considered very low and no provisions for detecting them (for example, eDNA sampling) are offered. eDNA sampling is still recommended as it is relatively simple and cheap, and it will resolve the question of whether tadpole shrimps are present.

7. **Risk of nutrients and microbial pathogens from land application of waste water degrading the water quality of sensitive waterbodies**
   More information is required on the risk of nutrients and microbial pathogens infiltrating into groundwater and degrading the water quality of sensitive waterbodies, in particular the Kawarau River.

   With regard to phosphorus, the updated EcIA says "*Estimated phosphorus loading exceeds the expected potential annual native planting uptake rate (WGA 2026). However, phosphorus is less mobile than nitrogen and is expected to be attenuated through adsorption to soil particles and retention within soils and strata*." It is of concern that phosphorus loading will exceed plant uptake. While it is true that phosphorus tends to bind to soil particles, nevertheless both the phosphorus and the soil particles it is bound to can be exported to streams during rainfall events via surface runoff. This occurs commonly in pasture catchments, and is well documented in the scientific literature. Since the Ridgeburn Development has a moderately wet climate (889 mm of rain/snowfall per year), surface runoff events are expected to occur several times per year. Phosphorus export to the Arrow River from spray irrigation of treated wastewater appears to be the most significant concern remaining with regard to effects of this development on freshwater. The Arrow River discharges to the Kawarau River, which has a water conservation order (1997).

This identifies waters to be protected including the Kawerau River mainstem from Scrubby Stream to Lake Wakatipu control gates.

Please note further freshwater issues under the discussion of conditions below.

Wetlands

8. **Hydrological information on the wetlands is lacking**

There are four wetlands identified within the proposed activity area. Normal practice would be to clearly delineate the spatial extent of each wetland and assign wetland typologies using an accepted framework, such as Johnson and Gerbeaux (2004). This information is needed to understand the wetland types affected, the hydrological drivers that maintain them, and whether the proposal could result in any loss of wetland extent or function.

Wetland C is identified in the EcIA as an ephemeral wetland. It is less clear whether Wetlands B and D should also be considered ephemeral, although the application describes them as having intermittent or seasonally variable hydrology. Ephemeral wetlands are recognised as a naturally uncommon ecosystem and are classified as Critically Endangered by Holdaway et al. (2012). This does not appear to have been reflected in the ecological values assessment.

The proposed avoidance of direct works within Wetland C and establishment of a planted buffer are positive measures. However, for an ephemeral wetland, maintaining hydrological function is critical. The current assessment does not provide enough wetland-specific information on catchment extent, flow paths, or seasonal hydrology to support a confident conclusion that Wetland C will not be adversely affected.

Understanding the hydrology is important because the ecological function of an ephemeral wetland is controlled less by annual water volume alone, and more by the timing, frequency, duration, and depth of inundation. The distinctive values of ephemeral wetlands depend on the balance between water inputs and drying processes. It is considered that avoidance of hydrological effects on Wetland C would require avoiding development activities within the ephemeral wetland catchment, unless the applicant can demonstrate that the wetland's hydrological regime will be maintained. This is important because the wetland's hydrology supports a critically endangered naturally uncommon ecosystem.

Filling this information gap would require continuous monitoring of water levels over as long a period of time as possible (ideally a year or more) prior to development, and then continuing this monitoring post-development to ensure the current hydrological regime is maintained.

The application reports only minor catchment changes for Wetland C. However, the reports do not provide a Wetland C-specific assessment of how the proposed stormwater design, earthworks, and altered flow paths will affect the wetland's hydroperiod. It is therefore unclear whether the existing wet/dry regime will be maintained.

The information provided also does not clearly show what activities will occur within Wetland C's contributing catchment or what the potential impacts on wetland hydrology might be. The Appendix 28 stormwater drawings suggest that residential development and roading may occur within the Wetland C catchment area. If that is correct, this could

represent a potentially substantial alteration to the catchment processes that currently support the wetland's uncommon ephemeral values.

Please note further wetlands issues under the discussion of conditions below.

9. **Native planting and enhancement proposed for wetlands**
We refer to the summary of consultation provided to the applicant pre-lodgement.

The application should address how the natural wetlands areas proposed for restoration are to be protected in perpetuity.

More detail on the native plantings/enhancement proposed for wetlands and riparian margins, as well as proposed conditions addressing wetland management, including objectives, measures, targets/plantings and monitoring, are required to assess the effects on wetlands.

Conditions

It is considered that some of the proposed draft conditions are broad and should be more specific in terms of objectives, targets and monitoring/reporting requirements.

The certification process should also be clearly set out in conditions including timeframes and identification of the relevant regulator undertaking the review and certification.

10. **1.0 Subdivision**

Condition 8: The description of the Fish Management Plan is inadequate. However, Condition 4.1(3) in "4.0 Works within beds of lakes and rivers" is sufficient. The applicant should consider repeating or referring to Condition 4.1(3) in Condition 8.
Condition 9: in relation to pest control. The objective is broad and sets no targets about what the pest control will achieve (other than controlling all target species). There is also no requirement for monitoring or annual reporting to Council.

Condition 10: To ensure the condition secures the outcomes intended, it is recommended that specific targets and timeframes are set out in the conditions. An example is provided below:

No less than 20 working days prior to works commencing, the Consent Holder must submit a Weed Control Management Plan (WCMP) prepared by a suitably and experienced qualified ecologist to the XX Council for certification. The purpose of the WCMP is to control unwanted weeds and plant disease that could impact the growth of 'revegetation planting on Morven Hill and the river escarpment' as illustrated on the Landscape Design

Document Part Two, 'Landscape Masterplan page 05' Revision A.04, prepared by RMM and dated 6 March 2026.

The WCMP shall include, but not be limited to:

(a) A map showing the location and abundance of weed infestations within the revegetation planting areas;

(b) Description of methods to be used for the control of weeds and plant disease, including timing, frequency, and methodology of weed control works;

(b) Identification of target weed species considered to pose the greatest risk to the establishment and growth of the revegetation planting;

(c) Monitoring methods to assess weed cover and the effectiveness of control measures; and

(d) Performance targets for weed control, to be achieved and maintained as follows:

*(i) **Year 5 target:** Weed cover (by canopy area) within the revegetation planting areas shall not exceed **10%** of the total planted area, with no individual weed species classified as a National Pest Plant Accord species or regional pest plant present within the planting areas; and*

*(ii) **Year 10 target:** Weed cover (by canopy area) within the revegetation planting areas shall not exceed **2%** of the total planted area, and the revegetation planting shall demonstrate self-sustaining canopy closure sufficient to suppress weed regrowth without ongoing active management.*

(e) A monitoring and reporting schedule, including provision for reporting to Council on progress against the Year 5 and Year 10 targets, with reports to be submitted within [three] months of each milestone date; and

(f) Contingency or remedial measures to be implemented should monitoring identify that the Year 5 target is unlikely to be met, to ensure the Year 10 target remains achievable. The consent holder shall implement the WCMP as certified by Council, and shall continue to implement the WCMP until such time as the Year 10 target has been achieved and confirmed in writing by Council.

Condition 11: requires a Planting Plan. Condition 11(b) notes ecological covenant areas that are set out. Please confirm where the conditions relating to a covenant are and where the areas intended to be covered by a covenant are.

The condition should also set out the required width of riparian planting, timings for plantings, etc.

A condition is required to ensure that plantings within the areas identified for lizard habitat enhancement are overseen by a suitably experienced and qualified ecologist/ herpetologist to ensure the works are being undertaken in accordance with the certified LMP.

Condition (d) weed control, should follow the specifications in the new Condition 10 above.

Condition 19 j) Stormwater does not include a performance standard. A performance standard should be added to ensure that stormwater discharges to the natural inland wetlands do not cause erosion or scour, meet appropriate standards for reduction of sediment and other contaminants, and have flow rates similar to pre-development during both high flow and low flow conditions.

11. **2.0 Land use consent**

    Condition 21 (i) (Stormwater) ii. currently does not include a performance standard. A performance standard should be added to ensure that stormwater discharges to the natural inland wetlands does not cause erosion or scour, meet appropriate standards for reduction of sediment and other contaminants, and have flow rates similar to pre-development during both high flow and low flow conditions.

12. **3.0 Water Permit**

    In **Section 3.2 (Diversion of Stormwater)**, an additional condition related to the diversion of stormwater, similar to Condition 3, is required to protect receiving environments, for example: *Condition (4) The diversion of stormwater must not cause erosion, land instability, sedimentation, nutrient enrichment or change in hydrology in any natural inland wetland or other receiving environment.*

13. **4.0 - Works within the beds of lakes and rivers,**

    Conditions should set out the certification process under this decision.

    Condition 2 says: "*The reclamation and diversion of the two intermittent streams must be undertaken in accordance with the Ecological Impact Assessment and Engineering Drawings referenced under Appendix 1.*" The Ecological Impact Assessment (EcIA) provides little detail about the design of the stream realignments, except for the lengths of the current streams and the proposed (realigned streams). It refers to Mckenzie and Co. drawings 4048-0-4340 to 4347, however we have not been able to locate these drawings, nor the engineering drawings referred to in the consent condition. Clarification is requested.

    Condition 2 should require a Riparian Planting Plan (RPP) to be submitted to Otago Regional Council for certification. The objectives of the RPP should be to ensure a long-term net ecological gain is achieved for the realigned intermittent streams and to ensure that the riparian planting and stream enhancement is undertaken in an appropriate manner to facilitate the on-going survival of those plants and to achieve the long-term enhancement of the watercourse values as described in the Ecological Impact Assessment.

14. **5.0 Wastewater Discharge Permit**

    Condition 6. The conditions for baseline monitoring should include monitoring of the Arrow River upstream and downstream of the location where runoff from the wastewater discharge area will enter the river. Baseline monitoring should include total phosphorus, dissolved reactive phosphorus, total nitrogen, nitrate, ammonia, dissolved organic nitrogen and E. coli.

    Condition 10. The conditions for ongoing monitoring and reporting should include monitoring and reporting on the same locations (Arrow River upstream and downstream of the location where runoff from the wastewater discharge area will enter the river) for the same set of parameters (total phosphorus, dissolved reactive phosphorus, total nitrogen, nitrate, ammonia, dissolved organic nitrogen and E. coli). Monitoring should be done during high flow conditions as well as during baseflow conditions.

    Condition 17: Maximum allowable concentration limits in the Arrow River downstream of the discharge area also should be set. The trigger level for each parameter should be

specified in the Wastewater Land Application Management Plan (WLAMP) and certified by Otago Regional Council.

15. **6.0 Land Use consent (ORC)**

    Condition 3: - As part of an environmental site induction – the Lizard incidental discovery protocol (attached to LMP) should be discussed as well as the other management plans.

    Condition 7: requires a LMP to be certified by ORC. This needs to be certified by DOC as the regulator of the Wildlife Act Authority. It is recommended that under the proposed conditions for resource consent, the Lizard Management Plan is also required and adhered too as it addresses effects on lizards, their habitat and monitoring of the lizard enhancement areas

    Condition 11: should specify that the Wetland Monitoring and Management Plan (WMMP) must include details of the proposed 10 metre planted buffer around each wetland and the enhancement planting within each wetland. Details within the management plan should also include (but not limited to):

- Ensure that activities and maintenance within and adjacent to the wetlands are managed in an appropriate manner to facilitate the ongoing survival of wetland vegetation to ensure no loss of extent or loss of any values of the natural wetlands
- Methods to avoid damage to the wetlands from adjacent activities associated with the subdivision
- Measures to ensure that wetland hydrology will be maintained,
- The plant species to be planted around and within each wetland,
- A maintenance schedule to ensure plant survival, and a management schedule for control of plant and animal pests.
- The WMMP should also specify the parameters that will be monitored, which include: the areal extent and vegetation composition of the wetland, wetland hydrology (continuous

measurement of surface water depth and depth to water table), pest plant and animal abundance.

- Details of the monitoring programme to demonstrate that the measures have been achieved including contingency or remedial measures if anticipated measures have not been achieved
- Reporting requirements to Council.
  The WMMP should be prepared by a SQEP and submitted to Otago Regional Council for certification within a specified timeframe.

  Conditions 12: should set out how the natural inland wetlands will be marked out onsite prior to construction to ensure they are avoided and protected i.e. fenced to prevent construction vehicles driving over the wetlands.

  Condition 13: relating to vegetation clearance and earthworks should not only refer to the certified LMP but also the Lizard incidental discovery protocol.

  Condition 23: contains the Accidental Discovery Protocol which is supported.

16. ***9.0 Wildlife Act Authority***
    More detail on planned control and monitoring of rodents at release sites is required.

    Certification of the lizard management plan for the purposes of the Wildlife Approval is required to be undertaken by DOC as opposed to the Regional Council.

Nāku noa, nā

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