

16 April 2025

Brymer Farms Limited

Cc: Fraser McNutt (Barker and Associates)

Brymer Development Fast Track Referral Application - Ecology

Introduction and Project Description

Brymer Farms Limited are applying under the Fast Track Approvals Act (2024) for consent to undertake a residential development called Brymer (the site), which encompasses a 81 ha site, located between Brymer Road and Whatawhata Road, on the western side of Hamilton (Figure 1).

Brymer Farms Limited, as the applicant, engaged Ecological Solutions Limited (ESL) to provide ecological consultancy services for the master planning, consenting and design of Brymer. Brymer is a residential development that comprises circa 1,650 residential units of varying typologies, such as detached, duplexes, terraces, apartment units and retirement village units, along with a supporting mixed-use neighbourhood centre, open spaces, and infrastructure. The Brymer Masterplan is shown in Figure 2 and contained within the Urban Design Memorandum.

The residential community is underpinned by a series of design principles, which focus on creating a well-connected, legible and diverse community on Hamilton City's urban fringe. The proposed transport network, with a 20-metre-wide spine road running north-to-south, is supported by local roads, cycle connections and pedestrian pathways to create an accessible and legible development. As aforementioned, a range of housing typologies and densities are proposed to meet the growing and changing needs of the housing market to ensure there are options for future residents. Each typology has been thoughtfully located, based on opportunities and constraints, with density ranging from terraces, duplexes and standalone dwellings to ensure integration with the adjoining urban footprint.

In the heart of Brymer is a 0.3 hectare mixed-use neighbourhood centre that will provide a range of amenities and services to support the residential development. This mixed-use neighbourhood centre will likely include commercial properties, cafés and a local superette. Apartment units are provided above the neighbourhood centre. The commercial element of the residential development has been scaled to support the density proposed, located directly adjacent to the majority of apartment building typology.

Sitting at the higher, northern point of the site is a retirement village, that comprises approximately 3.4 hectares, and provides villa terraces, apartment units and an amenity building. This will be serviced by its own private transport network, infrastructure, and high amenity open spaces.

Integrated throughout the residential development are a number of open spaces that are well distributed to create a highly amenable community that will be a pleasant and enjoyable place to live for future residents. The open spaces support ecological restoration through the retention of a number of natural wetlands and riparian revegetation.

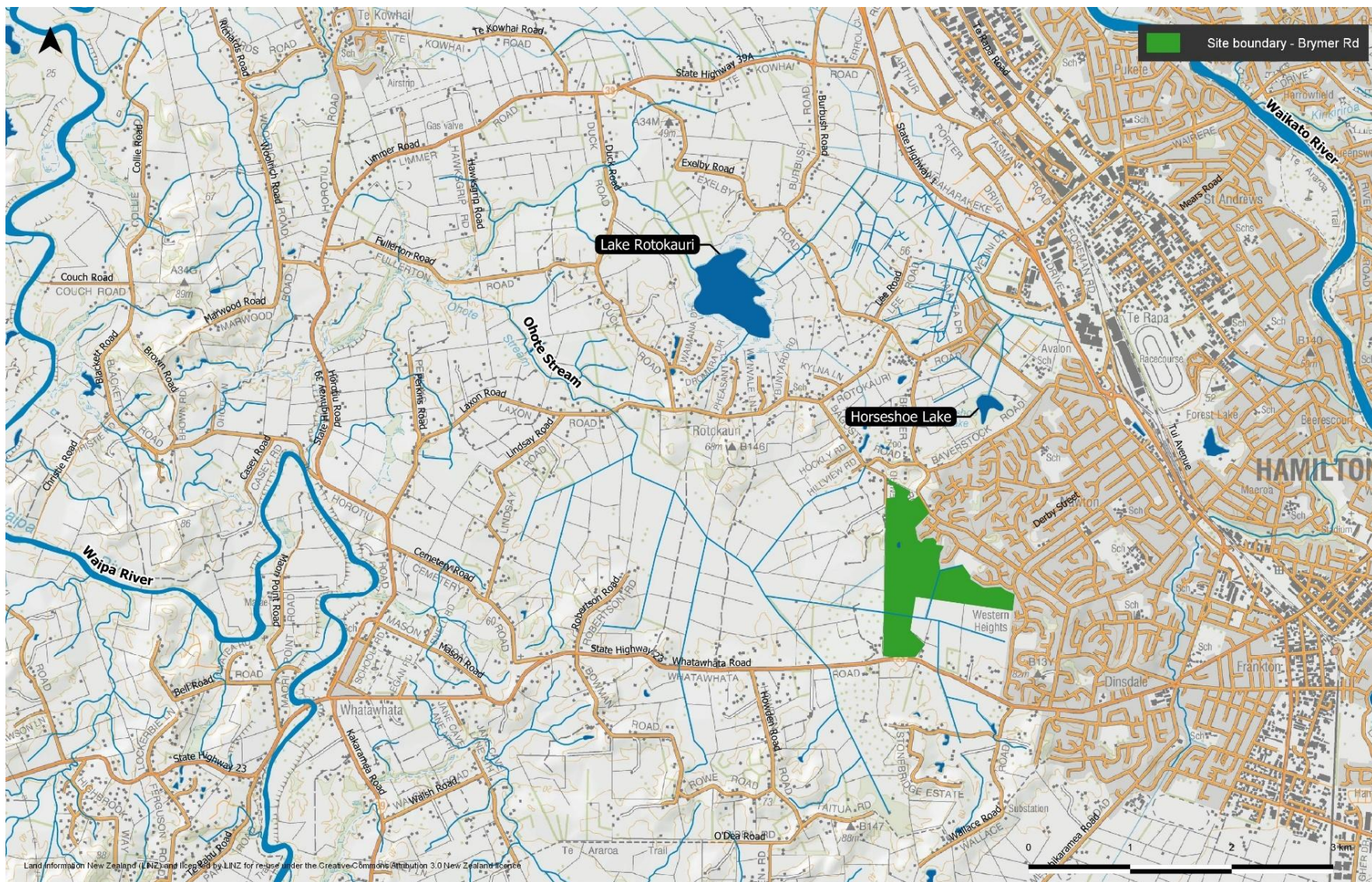
























Figure 1: Location of the proposed Brymer development

High-level Masterplan*

* This masterplan document represents a high-level conceptual layout only. The proposed site layout, estimated yield, typologies, and land uses illustrated herein are indicative and are subject to further adjustments upon comprehensive technical investigations and detailed design processes, including but not limited to engineering, ecological assessment, geotechnical analysis, and hydrological studies.

Legend

-  Apartment Blocks
-  Higher Density with Rear Lanes - Terrace Housing (4.5m - 6m lot typology)
-  Higher Density - Duplex / Terraces (7.5m - 9m lot typology)
-  Lower Density - Duplex / Detached (10m - 12m lot typology)
-  Lower Density - Detached (12m+ lot typology)
-  Larger Lot Residential (1000m² and above)
-  Irregular Shaped / Rear Lots
-  Retirement Village - Villa terrace, apartment units, amenity building (approx. 0.3ha)
-  Mixed-use with apartment units above / Neighbourhood Centre (approx. 0.3ha)
-  Proposed Open Spaces / Riparian / Native Revegetation Areas
-  Existing Water Bores
-  Proposed Pump Station
-  Proposed Wastewater Discharge and Treatment Area
-  Proposed Stormwater Ponds (shapes to be confirmed at future design stages)
-  Existing Key Drains (as identified through Waikato Regional Council GIS mapping)
-  Existing Waterway
-  Existing Wetlands To Be Retained and Revegetation (include 10m buffer areas)
-  Proposed Main Road (~20m)
-  Proposed Local Road (~16.8m)
-  Proposed Bridge or Culvert
-  Connections to Existing Street Network
-  Possible Future Road Connections

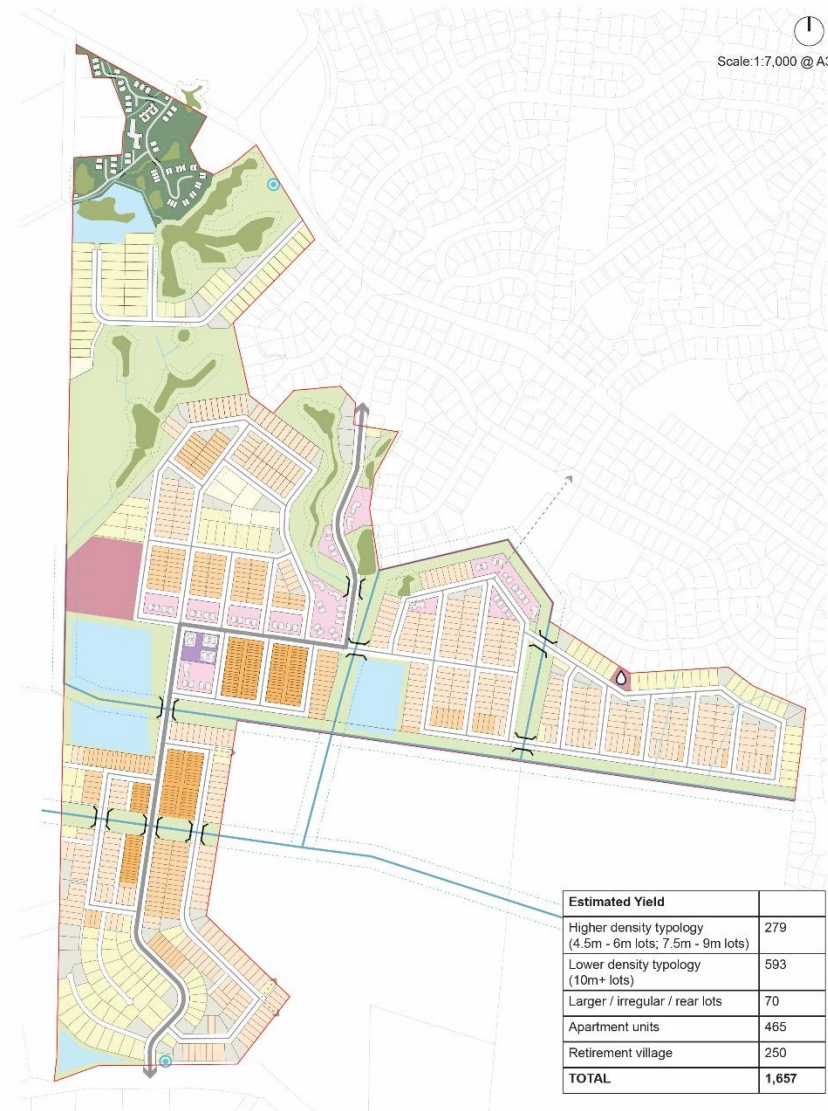


Figure 2: Proposed Brymer Masterplan.

The development will be appropriately serviced via a robust infrastructure strategy, which includes a new pump station, wastewater discharge and treatment area, stormwater ponds, and utilisation of the existing water bores.

Anticipated Scope

ESL will deliver all of the ecological outputs for the project through to consenting. ESL will prepare a description of the current ecological values, provide an assessment of the effects of the proposal and set out the methods to avoid, remedy, mitigate and offset those effects on the environment. ESL will prepare any management plans required to address any effects on ecological values.

Once the necessary resource consents are obtained, ESL may also assist with implementation of the environmental management plans as required.

Background Analysis and Receiving Environment

A preliminary assessment of ecological values for the project area have been identified and quantified using existing ecological databases (New Zealand Freshwater Fish Database (NZFFD), Department of Conservation Bioweb and eBird), relevant historical reports and multiple site walkovers, the most recent being April 2025. Ecological features such as native vegetation, habitat for fauna, wetlands and watercourses, were indicatively mapped (noting that comprehensive studies will be undertaken to inform the resource consent application, should the application be accepted and listed under The Fast Track Approvals Act, 2024).

The existing land use within the Site is a combination of agricultural and cropping, and artificial drainage networks have been established historically in order to enable these activities. The overall lack of indigenous vegetation and the modified and degraded nature of the watercourses and wetlands present, reflects this history.

Terrestrial Ecological Values

Almost no native vegetation is present within the Site, with the exception of a small block (1.26 ha) of kānuka (*Kunzea robusta*) which is heavily grazed and has a depleted understory and ground cover layer. The northern bounds of the Site comprise grazed pasture, while the low-lying southeastern part of the Site is planted in crops (maize). There are no Significant Natural Areas identified within the Site or immediately adjacent.

With respect to fauna within the Site, native birds present and in the local area (according to eBird records) include exotic and common native species. Given the overall absence of vegetation within the Site, habitat for birds is limited. Copper skink (*Oligosoma aeneum*) (At Risk – Declining) have been recorded within 10 km of the Site. If present within the Site, copper skink are likely to be restricted to very small areas of suitable habitat associated with woody debris (isolated piles and the kānuka block) and in weedy shrubs and overgrown/rank grass along fence lines.

Mature and senescent exotic trees, particularly within the northern extent of the site and the kānuka block may provide foraging and roosting habitat for bats, but this is yet to be confirmed. The kānuka block was surveyed for bats in 2020 by the University of Waikato; however, no bats were detected (Department of Conservation Bioweb records).

Wetland Values

The Site includes wet gullies and remnant wetland fragments with the potential to be defined as natural inland wetlands according to the NPS-FM. The wetland areas observed in the most recent Site survey collectively cover approximately 2.57 ha.

All wetland areas have been affected by historic vegetation removal, drainage and livestock access and as a result they are highly modified and degraded. Wetland vegetation is generally dominated by introduced pasture, rushes and herbs.

Freshwater Ecological Values

The Site is located in the upper reaches of the southern eastern branch of the Ohote Stream. The Ohote Stream is a tributary of the Waipa River and is the major stream system within the Rotokauri Integrated Catchment Management Plan (ICMP). However, the Site itself, falls just outside the ICMP Area.

Freshwater habitat within the Site, has been highly modified through vegetation removal, drainage and channelisation, and as a result, the habitat values of the watercourses are currently very low. The low-lying flats within the site would have once been dominated by wetlands; however, this area is now maintained for grazing and crops by modified natural watercourses and artificial drains.

The NZFFD holds numerous records of native fish within the Ohote Stream catchment, some of which have conservation status (Dunn et al., 2017) and are considered 'At Risk – Declining', e.g., black mudfish (*Neochanna diversus*), longfin eel (*Anguilla dieffenbachia*), giant kōkopu (*Galaxias argenteus*), and īnanga (*Galaxias maculatus*). There is potential for at least some of these species to be present within the modified watercourses and artificial drains within the Site, despite their degraded state.

Key Actual and Potential Effects

The development of the Site into urban residential will involve works which have the potential for both positive and adverse effects. Based on the proposed masterplan, the anticipated effects include:

- Provision for riparian and wetland restoration, removing pest plant species and in turn increasing the amount of native vegetation within the Site, and enhancing habitat for native fauna.
- Retention and enhancement of the 1.26 ha block of kānuka.
- Removal of poor quality, predominantly exotic terrestrial vegetation (e.g., pasture crops and mature and senescent exotic trees) and habitat, and the effects of this loss on terrestrial fauna (e.g., birds, bats and lizards).
- The potential for unavoidable loss of low-quality wetland habitat (noting that the current masterplan provides for the retention of these features).
- The potential for unavoidable loss or modification of artificial drains, which may provide habitat for species such as black mudfish and eel.
- The potential for unavoidable loss or modification of modified natural watercourses (e.g., culverting), which may provide habitat for black mudfish, kōkopu species and eel.
- Potential adverse effects on water quality and aquatic life due to sediment and/or contaminant discharge during earthworks.
- Depending on timing, the potential disturbance of fish migration and spawning during earthworks.
- The potential for additional pest plant and animal species to be introduced to the Site and surrounding area.

The approach to addressing potential adverse effects is set out in the following section.

Approach to Addressing Effects

- The removal of predominantly exotic vegetation (or habitats) can be managed to avoid impacts on native fauna. A management plan approach is proposed to address any effects on birds, lizards and bats so that they are avoided or adequately mitigated. Management of fauna would be subject to the provisions of the Wildlife Act 1953, and the management of lizards specifically, would require a Wildlife Act Authority from the Department of Conservation.
- Any potential loss of low quality natural inland wetland habitat will be addressed via avoidance where practicable, and where loss cannot be avoided, mitigation and biodiversity offsetting/compensation will be implemented.
- The loss of potential black mudfish habitat if they are found to be present during detailed surveys will need to be addressed through the normal effects hierarchy process.
- The potential loss and/or modification of modified natural watercourses will be avoided where practicable, and where loss cannot be avoided, mitigation and biodiversity offsetting/compensation will be implemented.
- The magnitude of adverse effects on water and aquatic habitat quality (and ultimately fish and invertebrates) due to sediment discharges and sediment and contaminant deposition during construction will be minimised via best practice approaches to the timing of works and through careful construction methodologies. Erosion and sediment control measures will be implemented in accordance with WRC guidelines.
- The removal of modified and artificial watercourses has the potential to disrupt migration and spawning for native fish species for the duration of the works. This is of particular relevance for giant kōkopu which are of conservation interest and may be spawning within watercourses. These effects will be reduced by managing the timing of the works and through fish relocations (see below).
- There is the potential for fish to be directly affected during works in modified natural watercourses and artificial drains. Fish capture and transfer can be used to manage the direct impacts of habitat loss on native fish. These effects, including on black mudfish, would be addressed via dedicated fish management plan(s).
- The proposed culverts have the potential to impact fish passage. Culverts will be designed in accordance with best practice solutions to provide fish passage by drawing on the New Zealand Fish Passage Guidelines, version 2.0 (NIWA, 2024).
- The potential for weed introduction can be managed via site biosecurity protocols (e.g., for earthworks machinery entering the site) and including weed management actions as part of planting and restoration management.

Public Good

Proposed riparian and wetland planting is expected to improve ecological values within the Site and upper Ohote Stream catchment. Revegetation of riparian areas will enhance the quality of habitat for indigenous fauna throughout the catchment and wider landscape in the medium to long-term and improve ecological resilience and integrity. Planting and management of the site in the short to medium-term will also provide employment.

Conclusion

The anticipated effects of the project on ecology appear to be manageable through application of the effects management hierarchy, suitable conditions during consenting and the implementation of management plans. With respect to wetlands and black mudfish this would require biodiversity offsetting/compensation to address residual effects and there is opportunity for this to occur within the site (e.g., creating and extending existing wetlands) and within the Waikato Region. A detailed ecological assessment and ecological management/ offsetting/compensation plan will be included in the resource consent application package, should the application be accepted and listed under The Fast Track Approvals Act (2024).

Qualifications and Experience

Ecological Solutions Ltd. (formerly Freshwater Solutions Ltd and The Ecology Company Ltd) are expert freshwater and terrestrial environmental consultants with offices based in Auckland, Tauranga, Hawkes Bay, Nelson and Northland from where we service our national client base. The company is managed by Richard Montgomerie who founded Freshwater Solutions Ltd in 2009. Dr Gary Bramley is the terrestrial team lead and Nick Carter is the freshwater team lead, each with more than 20 years' experience managing a diverse range of environmental projects, including significant infrastructure and housing projects, throughout the country.

Becky Bodley one of our senior ecologists, is the project manager for the Brymer project. Becky has over 14 years' experience managing a diverse range of projects (as above) including most recently the Rotokauri Greenway Project, also located in Waikato, which was granted consent under the COVID-19 Recovery (Fast-track Consenting) Act 2020 in July 2024.

Ecological Solutions Ltd has extensive experience in the Waikato Region, having provided ecology services for numerous land development projects and primary sector clients. Ecological Solutions Ltd are experienced in developing appropriate mitigation and biodiversity offsets required to offset terrestrial, wetland and stream habitat loss for a range of flora and fauna, including wetlands and black mudfish. The most recent example of black mudfish offsetting included the preparation of an enhancement plan for Lake Waiwhakareke to offset the loss of black mudfish habitat for a local development project. This project was deemed successful and resulted in a reproducing population of black mudfish.