

**APPENDIX 5 - CONSULTATION DOCUMENTS AND RECORDS WITH THE DEPARTMENT OF CONSERVATION**

<b>Department of Conservation</b>			
<b>Tab</b>	<b>Document</b>	<b>Date</b>	<b>Pages</b>
1.	Letter to DOC – Fast-track Application Consultation Ohoka Residential Development	29 January 2025	1-3
2.	Department of Consultation Fast-track Pre-Lodgement Consultation Summary	2025	4-7
3.	Email record of consultation with DOC	29 August 2025	8-12
4.	Technical assessment of fast track “531-535 Mill Road Residential Development Project- Lizard Management Plan.” Ohoka Residential Subdivision	29 August 2025	13-14
5.	Letter from PDP to Carter Group RE: OOKA LIZARD MANAGEMENT PLAN FEEDBACK REVIEW	3 June 2026	15-18

29 January 2025

Department of Conservation

**Novo Group Limited**  
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info@novogroup.co.nz

By email: [FastTrackApplicationEnquiries@doc.govt.nz](mailto:FastTrackApplicationEnquiries@doc.govt.nz)

Dear Sir/Madam,

## **FAST-TRACK APPLICATION CONSULTATION ŌHOKA RESIDENTIAL DEVELOPMENT**

1. We write on behalf of Carter Group Limited to engage with the Department of Conservation regarding a proposal to undertake a large-scale residential development at Ōhoka in the Waimakariri District.
2. The proposal will be the subject of an application for fast-track approval under the Fast-track Approvals Act 2024 ('the Act'), noting that the development is a listed project under Schedule 2 of that Act. Carter Group Limited intends on lodging its application on 7 February 2025.
3. The fast-track application will seek consents that would normally be required by the district plan, regional plans and national environmental standards as well as Wildlife Act 1953 approvals. These consents will authorise the proposed subdivision and future land use of the site. The fast-track application is currently being prepared.
4. Carter Group Limited wish to engage and consult with the Department of Conservation on the proposal to ensure that the project covers the necessary requirements for a Wildlife Act approval under Schedule 7 of the Act. This letter provides a summary of the proposal below.
5. We are happy to arrange a meeting at a mutually agreeable time in the next week, noting our intended lodgement date of 7 February 2025. We note that Carter Group recently requested consultation with the Department of Conservation in respect of its Ryans Road industrial development proposal, which will also be the subject of a fast-track application. We request that consultation relating to both proposals are run concurrently, including utilising the same meeting.

### **Summary of the Proposal**

6. The proposal is a coordinated and master-planned expansion of the existing Ōhoka settlement involving the subdivision and development of approximately 153 hectares of rural zoned land. Commercial activities and recreational facilities are proposed alongside residential activities. The key features of the proposal are:
  - The site is located at 347 Whites Road, Ohoka which is legally described as Lot 2 & 3 Deposited Plan 318615, Lot 2 and Part Lot 1 Deposited Plan 8301, and Lot 2 Deposited Plan 61732.



- The site is zoned Rural in the Operative Waimakariri District Plan. The planning maps identify the 66kV electricity transmission lines that run through the western part of site and that esplanade provisions apply along Ōhoka Stream.
- 872 residential allotments, generally ranging in size from 500m<sup>2</sup> to 2,500m<sup>2</sup>.
- Two commercial super lots providing for the development of a modestly sized local centre to serve the local community with day-to-day goods and services.
- Provision for the development of the establishment of a 305-unit retirement village.
- Provision for the development of a polo ground and associated facilities.

7. The design drivers that underpin the proposal include:

Leveraging and enhancing natural assets by:

- recognising and retaining the natural hydrology of the site including naturalising the existing waterways,
- protecting the waterways and local springs through building setbacks and landscaped margins,
- retaining the existing tree cover and shelterbelts where practical,
- creating new landscape margins to waterways with a focus on tree planting,
- introducing native plant species within stormwater management areas to add to the biodiversity of the site, and
- using extensive landscaped areas to offset the introduction of impervious surfaces.

Building community by:

- providing opportunities for people to live and work in Ōhoka,
- assisting in the creation of a village centre around the historic setting of Mill / Whites intersection and the domain,
- providing opportunities for commercial and community facilities to be integrated in the village centre,
- creating streetscapes that are reflective of the character of the settlement, and
- allowing for the growth of the settlement through incremental staged development.

Enhancing connectivity by:

- providing high quality amenity for all internal connections to support pedestrian and cycle movement,
- using the naturalised waterway margins and new green links throughout the site,



- creating a positive interface on Mill Road along the village centre, and
- creating a new direct interface with the Ōhoka Domain.

### **Wildlife Act Matters**

8. The site has been surveyed and potential lizard habitat has been identified, although no lizards have been observed on site. As lizards may be present a Wildlife Act approval will be sought and appropriate Lizard Management Plans will be in place for the duration of development and earthworks. Refer to lizard habitat assessment memo prepared by Pattle Delamore Partners.

### **Next steps**

9. Carter Group Limited would appreciate the opportunity to:
  - seek your feedback on the Wildlife Act specific aspects of the development,
  - discuss opportunities for ongoing collaboration, and
  - understand any concerns or considerations you may have.
10. We invite any comments or requests from the Department of Conservation on any of the matters discussed above. We anticipate further opportunities for collaboration and comment will be provided through the fast-track approval process.
11. We trust the above is sufficient, however, should you require any further information please do not hesitate to contact the undersigned.

Yours sincerely,

**Novo Group Limited**

Tim Walsh

Senior Planner

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██

0021051

# Fast-Track Pre-Lodgement Consultation Summary

**Purpose** - This document provides a summary of information from DOC following a pre-lodgement consultation request.

## Project Details

<b>Project name:</b>	Ōhoka Residential Development
<b>Engagement type:</b>	Pre-lodgement Consultation – Substantive Application
<b>Applicant/agent:</b>	Carter Group Limited - Jarred Arthur Pattle Delamore Partners
<b>Proposal overview:</b>	<p>The proposal is a coordinated and master-planned expansion of the existing Ōhoka settlement involving the subdivision and development of approximately 153 hectares of rural zoned land.</p> <p>Commercial activities and recreational facilities are proposed alongside residential activities.</p>
<b>Location:</b>	The site is located at 347 Whites Road, Ōhoka which is legally described as Lot 2 & 3 Deposited Plan 318615, Lot 2 and Part Lot 1 Deposited Plan 8301, and Lot 2 Deposited Plan 61732.
<b>Date pre-lodgement request received:</b>	29/01/2025 (note further information was requested after the initial request was received).
<b>Documents provided by applicant:</b>	<p>Letter to DOC – FAST-TRACK APPLICATION CONSULTATION ŌHOKA RESIDENTIAL DEVELOPMENT (Dated 29/01/2025)</p> <p>PDP Memorandum of Lizard Habitat Assessment Results (12/12/2024)</p> <p>16013-AP-120-130-B - Scheme Plan Set.pdf</p> <p>DOC pre-application form</p>
<b>Summary of pre-lodgement Consultation</b>	
<b>Fast track project lead DOC:</b>	Marie Payne – Senior Fast Track Consents Advisor (National Office)
<b>DOC specialist input required:</b>	<p>Fast Track Project Lead</p> <p>RMA Planner</p> <p>Permissions Advisor(s)</p> <p>Statutory Manager (Regional Office)</p> <p>BHV – Technical Specialist – Lizards</p>

<p><b>DOC Permissions/ Approvals Identified by applicant in pre-lodgement request as potentially required:</b></p>	<p><b>Authority under Wildlife Act 1953</b></p> <p><i>Potentially lizard handling and translocation permit</i></p> <p>The consultation request in the letter more broadly also states:</p> <p>Carter Group Limited would appreciate the opportunity to: “ - seek your feedback on the Wildlife Act specific aspects of the development, - discuss opportunities for ongoing collaboration, and - understand any concerns or considerations you may have”</p>
<p><b>DOC Commentary on Fast Track approvals and permissions identified:</b></p>	<p><b>Wildlife Act 1953 Permissions/Permits</b></p> <p>The information provided to date sets out that:</p> <ul style="list-style-type: none"> <li>• A desktop assessment of Lizards has been undertaken.</li> <li>• A site visit was conducted to determine whether suitable lizard habitats were present (that may support an indigenous lizard population) on the 28<sup>th</sup> and 29<sup>th</sup> November 2024.</li> <li>• More detailed survey methods were not employed (e.g. trapping/tracking) – the applicant has advised (via email) that a baseline survey is now underway.</li> <li>• Based on a desktop assessment and site visit the report concludes: <ul style="list-style-type: none"> <li>○ 5 lizard species have been recorded within a 5-13km radius of the development site</li> <li>○ No lizards were observed during the site visit</li> <li>○ Several locations contained small areas of potential lizard habitat</li> <li>○ The Ōhoka Domain/ Ōhoka Bush Public Conservation Land (PCL) approx. 500m east suggests native lizards could be present at the development site.</li> </ul> </li> <li>• The PDP Memo recommends: <ul style="list-style-type: none"> <li>○ Staged vegetation clearance.</li> <li>○ Eco-piles can be used as a management technique to protect lizard populations in combination with staged vegetation clearance.</li> <li>○ Conducting a baseline lizard survey (rather than just assessing potential habitat) within the area containing the old farm building. <ul style="list-style-type: none"> <li>▪ Including diurnal lizard searches and nocturnal spotlighting to determine whether any native lizard specimens are present in the area. Diurnal surveys should be conducted over five days and nocturnal spotlighting searches after dark for up to three nights.</li> <li>▪ Once baseline surveys are completed, results can be used to determine whether additional lizard management measures should be taken.</li> </ul> </li> <li>○ That <i>“if native lizards are found onsite a Lizard Management Plan (LMP) may need to be prepared and submitted to the council for approval, and a Wildlife Act Authority (WAA) permit must be held for the capture and relocation of lizards at the</i></li> </ul> </li> </ul>

	<p style="text-align: center;"><i>site. Upon the completion of lizard management activities, construction works may commence’.</i></p> <p>Based on the information provided DOC advises that:</p> <ul style="list-style-type: none"> <li>• A Wildlife Approval is required if there are wildlife onsite and the project will affect that wildlife. The application for wildlife approval needs to include all the information listed in Schedule 7, Clause 2 (FTAA).</li> <li>• DOC understands that demonstrating ‘best practice methods’ through documents such as management plans can’t be deferred to a subsequent LMP as there is no mechanism for subsequent approvals in the FTAA.</li> <li>• To obtain a wildlife approval DOC strongly recommends that the applicant undertakes a baseline survey as the report recommends and carrying out subsequent actions if wildlife are found, this would include the development of a LMP which documents: <ul style="list-style-type: none"> <li>○ the identification of any species present and their number and location. It is noted that Lizards are extremely difficult to detect unless best practice methods are used.</li> <li>○ actual and potential effects on any lizard species that is found to be present.</li> <li>○ details of avoidance and mitigation methods.</li> <li>○ methods to salvage and relocate lizards including identifying and preparing release sites. Methods should be guided by species threat status (noting there are constraints on relocating lizards in the Canterbury region, and establishing appropriate habitat for relocation takes time).</li> <li>○ Duration – DOC would anticipate a wildlife approval will be required for activities for the duration of the construction phase.</li> </ul> </li> </ul>
<p><b>Treaty Settlement implications/considerations:</b></p>	<p>In the time available, DOC has not carried out a process to identify Treaty settlement obligations specifically relevant to this site but notes for the applicant that this will form part of the section 18 report prepared by MFE.</p> <p>We encourage the applicant to engage directly with Iwi as required by section 29 of the Act.</p>
<p><b>Potential Resource Management Act (RMA) considerations and effects:</b></p> <p><i>Note: DOC’s role in relation to 53(2)(m)(i) FTAA</i></p>	<p>As pre-lodgement consultation was primarily in relation to the wildlife approval being sought, very high-level RMA commentary has been provided. Some primary considerations for DOC include:</p> <ul style="list-style-type: none"> <li>• That the relevant biodiversity and environmental effects are considered fully as part of the full AEE application, including: <ul style="list-style-type: none"> <li>○ Assessing freshwater values</li> <li>○ Considering any impacts on the neighbouring reserve which is PCL administered by the council</li> </ul> </li> </ul>
<p><b>DOC Statutory Planning Document considerations in relation to site (e.g. CGP/CMS/CMP):</b></p>	<p>Although the site is not PCL it adjoins PCL. Wildlife considerations should be considered in the broader context of conservation values and consideration in</p>

	an application should be given to alignment with the <a href="#">Canterbury: Conservation management strategies</a> .
<b>Any further information/considerations:</b>	The applicant has not identified that they are applying for any freshwater fisheries permissions. However, the draft scheme plan indicates a culvert/crossing over the watercourse on site (Ōhoka Stream/tributary) – the applicant should assess whether a freshwater fisheries approval is required.
<b>Additional Notes:</b>	<p>While DOC will assist applicants as much as we can when they engage in pre-lodgement consultation, it is the applicants' responsibility to comply with the FTAA and to ensure they have applied for <u>all</u> permissions they need.</p> <p>DOC encourages the applicant to share draft application documents so that we can provide feedback on how it views alignment with information requirements of Schedule 7 of the Fast Track Approvals Act, noting DOC is unable to request further information once a completeness check is commenced by the EPA.</p> <p>Note that a panel will invite the statutory bodies listed in clause 4 of Schedule 7 to comment on the application (NZCA, conservation boards, Fish and Game Council, and Game Animal Council). We encourage applicants to engage with these bodies in advance of filing a substantive application.</p>

## Meg Davidson

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**Subject:** FW: Ōhoka Residential Subdivision [Filed 25 Mar 2026 15:03]

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**From:** Asher Cook [REDACTED]  
**Sent:** Friday, 29 August 2025 4:21 pm  
**To:** Jarred Arthur [REDACTED]  
**Cc:** Bruce Van Duyn [REDACTED] Tim Walsh [REDACTED]  
**Subject:** RE: Ōhoka Residential Subdivision

Kia ora Jarred,

See attached for feedback on the LMP from one of our technical advisors.

Please let me know if you have any follow-up questions.

Hope you have a nice weekend

Ngā mihi,  
Asher

---

**From:** Asher Cook [REDACTED]  
**Sent:** Thursday, 21 August 2025 11:50 am  
**To:** Jarred Arthur [REDACTED]  
**Cc:** Bruce Van Duyn [REDACTED] Tim Walsh - Novo Group [REDACTED]  
**Subject:** RE: Ōhoka Residential Subdivision

Okay, I'll follow-up with our technical advisors and will be in touch

Ngā mihi

---

**From:** Jarred Arthur [REDACTED]  
**Sent:** Thursday, 21 August 2025 11:48 am  
**To:** Asher Cook [REDACTED]  
**Cc:** Bruce Van Duyn [REDACTED] Tim Walsh - Novo Group <[REDACTED]>  
**Subject:** Re: Ōhoka Residential Subdivision

You're welcome Asher. Ideally, we'd like feedback within 10 working days if possible.

Cheers  
Jarred

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**From:** Asher Cook [REDACTED]  
**Sent:** Thursday, August 21, 2025 11:42:17 AM  
**To:** Jarred Arthur [REDACTED]  
**Cc:** Bruce Van Duyn [REDACTED] Tim Walsh - Novo Group [REDACTED]  
**Subject:** RE: Ōhoka Residential Subdivision

Kia ora Jarred,

Thank you for providing us with the LMP.

When were you hoping to receive feedback by?

Ngā mihi

---

**From:** Jarred Arthur [REDACTED]  
**Sent:** Thursday, 21 August 2025 7:24 am  
**To:** Asher Cook [REDACTED]  
**Cc:** Bruce Van Duyn [REDACTED] Tim Walsh - Novo Group [REDACTED]  
**Subject:** RE: Ōhoka Residential Subdivision

Kia ora Asher.

Please find attached the LMP for the Ohoka Residential Development. Apologies again for lateness.

Could you please share any technical feedback your team may have? I appreciate that there could be some questions around timelines and permit terms which are yet to be ironed out on our end.

Cheers  
Jarred

Jarred Arthur | Technical Director - Ecology  
Pattle Delamore Partners Ltd

[REDACTED]



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**From:** Asher Cook [REDACTED]  
**Sent:** Friday, 8 August 2025 2:13 pm  
**To:** Jarred Arthur <[REDACTED]> [REDACTED] Tim Walsh - Novo Group [REDACTED]  
**Subject:** RE: Ōhoka Residential Subdivision

Kia ora Jarred,

No worries, thanks for getting back in touch.

I look forward to seeing the LMP.

Have a nice weekend 😊

Ngā mihi,  
Asher

---

**From:** Jarred Arthur [REDACTED]  
**Sent:** Friday, 8 August 2025 1:53 pm  
**To:** Asher Cook [REDACTED]  
**Cc:** Bruce Van Duyn [REDACTED] Tim Walsh - Novo Group [REDACTED]  
**Subject:** RE: Ōhoka Residential Subdivision

Kia ora Asher.

Sorry it has taken so long to get back to you.

The advice I have been provided on behalf of the client is that lodgement will be around 22 August or hopefully earlier. I presume this is still the case, but I have cc'd in Bruce (project PM) and Tim (project Planner) who can correct me if I'm off the mark.

On that note, we are in the midst of finalising the reporting for the lizard salvage and translocation works. This includes a Lizard Management Plan. I'm hoping to pre-circulate this to you early next week in the attempt that we may be able get some useful feedback on the proposed plan prior to lodgement.

Will be in touch soon. Have a great weekend!

Jarred

**Jarred Arthur** | Technical Director - Ecology  
**Pattle Delamore Partners Ltd**

[REDACTED]  
Map - [Christchurch Office](#) | Web - [pdp.co.nz](#)



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**From:** Asher Cook [REDACTED]  
**Sent:** Thursday, 24 July 2025 11:53 am  
**To:** Jarred Arthur [REDACTED]  
**Cc:** Bruce Van Duyn [REDACTED] Tim Walsh - Novo Group [REDACTED]  
**Subject:** RE: Ōhoka Residential Subdivision

Kia ora Jarred,

Glad to hear things are progressing.

Do you have any indication at this stage of when the application might be lodged?

Ngā mihi,  
Asher

---

**From:** Jarred Arthur [REDACTED]  
**Sent:** Tuesday, 22 July 2025 1:22 pm  
**To:** Asher Cook [REDACTED]

Cc: Bruce Van Duyn [REDACTED] Tim Walsh - Novo Group [REDACTED]  
Subject: RE: Ōhoka Residential Subdivision

Hi again Asher.

Thought I'd reply to this email separately to the forum on the heritage site topic.

We are making progress on finding a suitable lizard translocation area. There are still a few logistics etc that we are sorting out, but will be in touch in due course.

Thank you for reaching out.

Cheers  
Jarred

Jarred Arthur | Technical Director - Ecology  
Pattle Delamore Partners Ltd

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From: Asher Cook [REDACTED]  
Sent: Friday, 18 July 2025 10:06 am  
To: Jarred Arthur [REDACTED]  
Cc: Bruce Van Duyn [REDACTED] Tim Walsh - Novo Group [REDACTED]  
Subject: Ōhoka Residential Subdivision

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Kia ora Jarred,

This is a message to let you know that I have taken over from Marie Payne as the DOC project lead for the Ōhoka Residential Subdivision.

As you'll recall we provided pre-lodgement consultation advice in April focussing mainly on lizards in relation to a wildlife approval.

Just checking in to see how things are progressing with your substantive application?

Ngā mihi

**Asher Cook**  
Senior Permissions Advisor  
Te Papa Atawhai | Department of Conservation  
+64 49090769  
Whare Kaupapa Atawhai | Conservation House  
18 - 32 Manners St | PO Box 10 420, Wellington 6143  
[www.doc.govt.nz](http://www.doc.govt.nz)

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## Technical assessment of fast track “531-535 Mill Road Residential Development Project- Lizard Management Plan.” Ōhoka Residential Subdivision

### **Initial assessment**

The current plan is inadequate.

The LMP lacks cohesion. For example, the main body of the LMP refers to detail in the appendices and the appendices refer to the LMP for detail that is not included. All information needs to be included in the LMP.

There isn't an indication of the duration of the permit being applied for. We also need to understand exact which species to include in the Authorisation, and to consider, this will also direct our assessment of protective measures.

### **Assessment of effects**

There needs to be a comprehensive assessment of the development that outlines the potential habitat present, informed by the lizard surveys. Then the herpetologist needs to make an estimate of the total number of lizards impacted. I've calculated 7 skinks per 100 trap night (this basic sum wasn't included in the LMP) which indicates that a moderate population may be present over the areas of suitable habitat.

### **Pest control**

The proposed pest control is unlikely to provide any benefit to lizards as the spacing and target species do not follow best practice. There is also no evidence that small scale pest control benefits lizards. I therefore attribute little protection measure for the planned predator control.

### **Post release monitoring**

The post salvage monitoring is inadequate and based on the methods provided is unlikely to determine if salvage has been successful.

### **Release area**

The release area needs to accommodate a larger population than is estimated present. The size of the release area is not specified, I calculate it to be around 25m x 25m which is inadequate (based on estimate of the pylon setback distances).

There is a statement that the release area will be protected by a covenant, but there is little evidence this will be implemented, nor any assessment of whether it would be possible. I have therefore assumed that there is some uncertainty on the long-term protection.

It doesn't look like the baseline lizard monitoring was undertaken in the release location. I strongly recommend that pre-release monitoring to be undertaken to understand how much capacity the site has and to provide sound pre-release population assessment for the purposes of monitoring.

Further information on how resident lizards at the release site (if present) will be protected from impacts associated with habitat enhancement would be valuable.

### **Enhancement planting in the release area**

The timeline for habitat enhancement at the release site has not been outlined in detail.

The application confirms the site is currently grazed pasture - this habitat is currently unsuitable for lizards. Even if the planting isn't completed it is critical that the area has deep rank grass, if that has not been provided there will be no protection for lizards as they will have a high probability of mortality post-release.

Grazing needs to be removed immediately, but the growth of grass is unlikely to be significant before spring so even if release of lizards was planned into unplanted rank grass, it would take several months of the growing seasons to develop the biomass of grass to be suitable for lizards (depending on rainfall etc etc).

Area planted for lizards around Christchurch have generally taken 2 years to become suitable for lizards - this timeframe allows plants to establish and become large enough to provide habitat for lizards and allows grass to become rank and recover from the disturbance caused by the planting activity. In some cases, we have accepted release of lizards into planted habitat after 1 year, but this is generally sub-optimal and only appropriate if a very small population will be released.

If plants are planted after release of lizards, there is a risk of additional mortality from the planting activity as the necessary digging of holes for plants, and the trampling of the rank grass decreased habitat quality and potentially crushes lizards.

The salvage could only go ahead this summer if the following modifications to the planting plan were made (ideally this would be reflected in a revised LMP, but could be conditioned in the wildlife approval component of their application)

- Planting should begin immediately and with urgency in the 2025 winter
- Before release, grass must be deep and rank, ungrazed and unmown. Irrigation may be needed if the spring is dry to encourage grass growth (i.e there must be old grass debris at the base of grass sward, and the top growing parts of the grass will be so deep and lush it will be falling onto itself)
- Planting should continue as outlined in the proposal, but if release of lizards is required this summer, then the planting should be staged to ensure there is enough unplanted rank grass to accommodate all lizards.



3 June 2026

• Tim Carter  
Carter Group Limited  
Level 2, ASB House, The Crossing  
166 Cashel Street  
Christchurch Central, Christchurch 8011

## RE: OHOKA LIZARD MANAGEMENT PLAN FEEDBACK REVIEW

### 1.0 Introduction

Carter Group Limited is submitting a Fast Track application for the development of a residential subdivision in Ohoka, North Canterbury. As part of the application, Carter Group Limited asked Pattle Delamore Partners (PDP) to assess lizard values at the site, and outline strategies to manage the effects of the development on the resident lizard population.

PDP submitted a Lizard Management Plan (LMP) to the Department of Conservation (DOC) as part of a pre-application consultation process for the proposed development. Feedback from DOC was received on 29<sup>th</sup> of August 2025. This memorandum outlines the themes of the feedback and whether/how suggested amendments have been adopted in a revised iteration of the LMP as submitted with the Fast Track consent application.

### 2.0 Technical Review Response

The following section outlines the major themes (**bold**) and details (*italics*) of the DOC feedback. The LMP has been updated by PDP as per bulleted responses.

#### Lack of Clarity

*The LMP lacks cohesion. For example, the main body of the LMP refers to detail in the appendices and the appendices refer to the LMP for detail that is not included. All information needs to be included in the LMP.*

- ∴ The DOC reviewer overlooked much of the information already contained within the original LMP document. However, to improve clarity, the LMP has been significantly reconfigured. This includes adding the enhancement plan into the LMP, in addition to providing it as a detailed appendix. The habitat memorandum and baseline survey results have been retained as appendices.

*There isn't an indication of the duration of the permit being applied for. We also need to understand exact which species to include in the Authorisation, and to consider, this will also direct our assessment of protective measures.*

- ∴ The permit duration is specified in Section 5.1 ('Salvage Timing'), and the species to be included are outlined in Section 3.2 ('Affected Lizard Species and Populations').

## Assessment of Effects

*There needs to be a comprehensive assessment of the development that outlines the potential habitat present, informed by the lizard surveys.*

- ∴ The habitat assessment report has been appended (Appendix A) and clearly referred to throughout the report (note Section 3.1)

*Then the herpetologist needs to make an estimate of the total number of lizards impacted. I've calculated 7 skinks per 100 trap night (this basic sum wasn't included in the LMP) which indicates that a moderate population may be present over the areas of suitable habitat.*

- ∴ The calculation above, and further discussion on lizard density estimates, has been addressed in Section 3.2.3.

## Pest Control

*The proposed pest control is unlikely to provide any benefit to lizards as the spacing and target species do not follow best practice. There is also no evidence that small scale pest control benefits lizards. I therefore attribute little protection measure for the planned predator control.*

- ∴ Pest management aligned with DOC best practice is outlined in the Habitat Enhancement Plan (Appendix D) and referenced in Section 6.4.4 of the LMP. As there is limited evidence on the level of predator control required to increase lizard populations, a precautionary and comprehensive approach has been adopted, and times have been increased from two years to a minimum of three years.

## Post Release Monitoring

*The post salvage monitoring is inadequate and based on the methods provided is unlikely to determine if salvage has been successful*

- ∴ Post release monitoring has been revised (Section 10.1) to increase the scope, and more accurately determine if salvage has been successful. Ultimately, continuing lizard monitoring has been increased to five years post-release (monitored every other year; i.e., Year 1, 3 & 5 post-release).

## Release Area

*The release area needs to accommodate a larger population than is estimated present. The size of the release area is not specified; I calculate it to be around 25m x 25m which is inadequate (based on estimate of the pylon setback distances).*

- ∴ The proposed relocation site has an estimated area of 1,000 m<sup>2</sup> (Section 6.1 of LMP). Confusion regarding the size of the relocation site was likely due to the graphic provided. We have updated the graphic for the relocation site in Appendix E of the LMP. It now contains a clear scale and dimensions to improve clarity.

*There is a statement that the release area will be protected by a covenant, but there is little evidence this will be implemented, nor any assessment of whether it would be possible. I have therefore assumed that there is some uncertainty on the long-term protection.*

- ∴ Carter Group Limited is proposing to vest the area where the lizard relocation site is located as a Local Purpose Reserve, which provides its long-term protection.

*It doesn't look like the baseline lizard monitoring was undertaken in the release location. I strongly recommend that pre-release monitoring to be undertaken to understand how much capacity the site has and to provide sound pre-release population assessment for the purposes of monitoring.*

- ∴ We acknowledge that baseline surveying was not undertaken within the exact boundaries of the proposed relocation area, however, surveys were completed in the immediately adjacent habitat of very similar habitat value. Lizard densities within the proposed relocation site are therefore expected to be comparable to, or lower than, those recorded in adjacent habitat, reflecting the current lack of refugia within the relocation area.

*Further information on how resident lizards at the release site (if present) will be protected from impacts associated with habitat enhancement would be valuable.*

- ∴ This point of clarification is considered unnecessary. Given the limited habitat value currently present at the proposed relocation site, the construction of eco-piles and associated planting activities are expected to pose a low risk to resident lizard populations (if any are present). Regardless, this has been addressed briefly in the main body of the LMP (Section 6.4.3) and in further detail within the Habitat Enhancement Plan (HEP) (Appendix D; Section 2.1.3).

### Enhancement Planting

*The timeline for habitat enhancement at the release site has not been outlined in detail.*

- ∴ This has been further expanded within the provided HEP, which includes detailed timelines for planting, as well as pest animal and plant control. PDP has developed a four-year programme in total, with site preparation commencing 6 – 12 months prior to the start of salvage. Timelines for enhancement can be further developed once construction timeframes are more fully known.

*The application confirms the site is currently grazed pasture - this habitat is currently unsuitable for lizards. Even if the planting isn't completed it is critical that the area has deep rank grass, if that has not been provided there will be no protection for lizards as they will have a high probability of mortality post-release. Grazing needs to be removed immediately, but the growth of grass is unlikely to be significant before spring so even if release of lizards was planned into unplanted rank grass, it would take several months of the growing seasons to develop the biomass of grass to be suitable for lizards (depending on rainfall etc etc).*

- ∴ This has been included in the HEP.

*Area planted for lizards around Christchurch have generally taken 2 years to become suitable for lizards - this timeframe allows plants to establish and become large enough to provide habitat for lizards and allows grass to become rank and recover from the disturbance caused by the planting activity. In some cases, we have accepted release of lizards into planted habitat after 1 year, but this is generally sub-optimal and only appropriate if a very small population will be released.*

- ∴ The enhancement plan outlines timings for plantings to ensure appropriate growth and cover. Plants selected for the initial planting are fast growing and can be purchased in larger plant bag sizes than minimum recommended, which will reduce the time needed for plants to become established and provide adequate cover for lizards. Furthermore, irrigation could be used to encourage faster growth of plants in the initial stages. The addition of eco-piles of rock and wood will further increase habitat availability, all of which will occur prior to the salvage process.

*If plants are planted after release of lizards, there is a risk of additional mortality from the planting activity as the necessary digging of holes for plants, and the trampling of the rank grass decreased habitat quality and potentially crushes lizards.*

- ∴ As in-fill planting has been proposed, if this is required, care should be taken to make sure that lizards are not caught underneath the shovel blade, and staff walk slowly through any rank grass. This is addressed within the HEP provided.

### 3.0 Conclusion

DOC feedback has been carefully considered by PDP, and the LMP (and other complimentary documents) have been revised to address key matters raised and to improve clarity where requested. Where changes have not been made, justification has been provided.

### 4.0 Limitations

This report has been prepared by Pattle Delamore Partners Limited (PDP) on the basis of information provided by Carter Group Limited. PDP has not independently verified the provided information and has relied upon it being accurate and sufficient for use by PDP in preparing the report. PDP accepts no responsibility for errors or omissions in, or the currency or sufficiency of, the provided information.

This report has been prepared by PDP on the specific instructions of Carter Group Limited for the limited purposes described in the report. PDP accepts no liability if the report is used for a different purpose or if it is used or relied on by any other person. Any such use or reliance will be solely at their own risk.

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Yours faithfully

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