
Attention: Expert Consenting Panel - Ashbourne

CC: Steph Wilson, Fraser McNutt, Caleb Pearson

Date: 18/11/2025

From: Chad Croft

RE: S53 Response WRC and MPDC

1. This memo addresses ecological comments made pursuant to Schedule 32 of the Fast-track Approvals Act 2024 (“FTAA”) regarding the Ashbourne Development (“the Project”).
2. I have reviewed the comments from Waikato Regional Council and Matamata-Piako District Council provided to the Panel in respect of the Project, and I am grateful to all those who have taken the time to comment, particularly in light of the timeframes available under the FTAA.
3. I am pleased to be able to respond in a constructive manner to the comments that have been provided and will continue to work with interested parties as the Project progresses.
4. Specifically, the comments provided by both WRC and MPDC that relate to ecology signalled a need for an assessment of effects as it relates to the National Policy Statement for Freshwater 2020 and consents required under the National Environmental Standards for Freshwater 2020.
5. The NPS-FM sets out the values that should be considered when assessing potential effects on natural inland wetlands and rivers. Specifically, Subpart 3 details these values as:
 - Ecosystem Health
 - Indigenous Biodiversity
 - Hydrological Functioning
 - Māori Freshwater
 - Amenity Values.
6. The following outlines an assessment of effects with regard to the proposed development of a stormwater conveyance channel extending from the Greenway and discharging to the Waitoa River.
7. The alignment of the conveyance channel will require earthworks within 100m and vegetation clearance within 10m of Oxbow Wetland 2. The vegetation clearance

required within 10m is estimated to result in the loss of c. 21m² wetland riparian vegetation.

8. The Ashbourne EclA concludes that the pre-effects management level of effect on Oxbow Wetland 2 attributable to the earthworks and vegetation clearance is 'low' under the EIANZ EclA guidelines.
9. This assessment of ecological effects is restricted to considerations of the values of ecosystem health, indigenous biodiversity, and hydrological functioning.

10. Ecosystem Health

"The hydrology of the oxbow wetlands are considered by WGA to be predominantly controlled by the Waitoa River. Flood events are expected to occur in which water will flow through the oxbow wetlands. In addition, the saturated zone within the river valley during winter is expected to include the oxbow wetlands." (Houlbrooke 2025)¹ The existing riparian vegetation surrounding the wetland is characterised by a mix of mature exotic and native trees and understory. The width of the riparian vegetation is variable surrounding the wetland ranging from c. 10m to c. 25m. While not native dominated, the riparian vegetation community surrounding Oxbow Wetland 2 is currently providing valuable function in terms of shade, organic input and filtration as well as habitat for terrestrial fauna.

The Waitoa River is a permanent watercourse, which has been heavily modified by channel straightening, and agricultural practices which are reflected in the poor water quality, lack of riparian vegetation, and extensive bank erosion in sections.

11. Indigenous Biodiversity

Oxbow Wetland 2 was found to contain indigenous fish (e.g. short fin eels and common bullies). The riparian vegetation community surrounding the wetland was characterised as a mix of exotic and native tree cover and understory with Eucalyptus, Swamp cypress, Acacia, Rimu and Totara characterising the tree cover. The riparian vegetation community and wetland provided potential habitat for indigenous birds, bats and lizards.

Fish diversity in the Waitoa River is low in the regional context, but the watercourse provides habitat for longfin eel, torrentfish and īnanga all of which have a conservation status of 'At-Risk – Declining'. The watercourse also provides some low-quality habitat for waterbirds.

12. Hydrological Function

"The hydrology of the oxbow wetlands are considered by WGA to be predominantly controlled by the Waitoa River. Flood events are expected to occur in which water will flow through the oxbow wetlands. In addition, the saturated zone within the river valley during winter is expected to include the oxbow wetlands." (Houlbrooke 2025). Flood modelling undertaken by Maven estimates Oxbow Wetland 2 is partially flooded on a two year interval and completely inundated during a 10 year interval. Groundwater inputs are expected to be a secondary component of the wetland hydro regime.

¹ Houlbrooke, Clare 2025. WGA response to Minute 2(i)

The Waitoa River serves an important hydrological function at a regional scale draining a large catchment which has been heavily modified. The flow within the river serves as important habitat for indigenous fish species and water birds.

13. Effects Assessment

Construction of the proposed stormwater conveyance channel will result in the removal of 21m² of riparian vegetation along the northeastern corner of the existing riparian margin. Earthworks within 100m of Oxbow Wetland 2 will result in the diversion of surface water and potentially groundwater.

The proposed Greenway stormwater outlet will result in the discharge of stormwater to the Waitoa River.

14. Ecosystem Health and Indigenous Biodiversity

The vegetation to be impacted is comprised of a mature exotic Acacia sp. tree and exotic grass (Figure 1). Removal of this vegetation is expected to reduce the amount of shade provision on the wetland and filtration capability over the short term.

As part of the Landscape design for the greenway, c. 320m² of native revegetation is proposed along the eastern boundary of the existing riparian vegetation surrounding Oxbow Wetland 2 (Figure 2). See Landscape drawing 2149/25 Greenway Plan 03 for the planting prescription details for the Native Enhancement High planting zone. This revegetation will increase the overall native component of the riparian vegetation, improve filtration for surface coming off the slope to the east, strengthen the shade provision for the wetland and increase the habitat capability of the riparian vegetation community for indigenous birds, bats and lizards over the long term. As a result, the loss of 21m² of exotic vegetation is not expected to have any significant adverse effects on the ecosystem health of Oxbow Wetland 2 and will positively contribute to greater indigenous biodiversity.

The primary hydrological influence on Oxbow Wetland 2 is the Waitoa River according to WGA. “The current drainage outlet discharge is expected to have high nutrient water flowing into the wetlands during winter. The future land use change is expected to improve the shallow groundwater quality (Houlbrooke 2025).



Figure 1: Vegetation to be impacted within 10m of Oxbow Wetland 2. Blue lines indicative alignment of stormwater conveyance channel and yellow line indicating vegetation to be impacted.

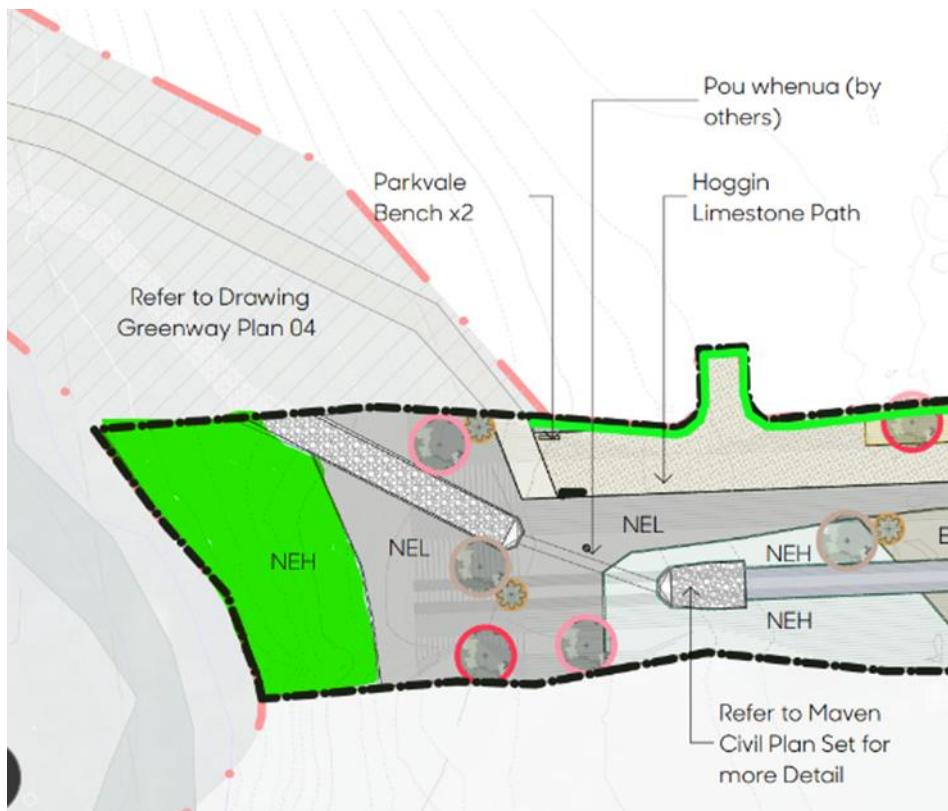


Figure 2: Indicative location of landscape restoration planting (Native Enhancement High) in green.

15. The Waitoa River is currently adversely impacted by organic pollutant or nutrient enrichment. The stormwater design incorporates treatment of runoff prior to discharge into the Waitoa River in accordance with TP10 / GD01 / Waikato Stormwater Management Guidelines (WRC Technical Report 2020/07). Therefore, the effects of stormwater on the Waitoa River are expected to be no greater than the current water quality and possibly an improvement due to the removal of high nutrient runoff from farm activities.

16. Hydrological Function

Clearance of 21m² of riparian vegetation is not expected to adversely affect the hydrological function of Oxbow Wetland 2. WGA have stated the hydrology of Oxbow Wetland 2 is primarily controlled by the Waitoa. Consequently, earthworks within 100m of Oxbow Wetland 2 is not expected to adversely affect the hydrological function of the wetland.

The proposed stormwater discharge has been designed with a higher runoff volume to be directed to the Waitoa River. This has led to a slight increase in the flood level, showing a 20 mm increase in water surface elevation observed in the flood sensitivity assessment for a 100 year event. While this increase is acknowledged, it is considered minor (Maven 2025a²).

² Maven 2025a. Stormwater Management Plan Ashbourne Developments, 18 November 2025.

During any 100-year flood event there is increased substrate movement, erosion and sedimentation in the river. During these conditions freshwater fauna seek off channel habitats and migrate out of the zone of impact to avoid adverse effects.

Mitigation to control discharge velocity at the outlet itself “via a weir and orifice set up with energy dissipation” (Maven 2025b³) is expected to adequately protect the riverbed and banks at the point of discharge.

While a potential increase in sedimentation as a result of increased flood levels is to be acknowledged, this is not expected to result in adverse effects on freshwater fauna beyond what is expected during 100-year events under the existing conditions.

17. Conclusion

In my opinion the proposed earthworks within 100m and vegetation clearance within 10m of Oxbow Wetland 2 is not expected to have significant adverse effects on ecosystem health, indigenous biodiversity or hydrological function of Oxbow Wetland 2.

Similarly, the effects of the proposed stormwater discharge on the ecological health, indigenous biodiversity and hydrological function of the Waitoa River are expected to be low as concluded in the EclA.

³ Maven 2025b Ashbourne Station Road Project Greenway Design Memo