

Methodology of SNA mapping flawed

1. Aerial photograph mapping of properties within the Waikato Regional Council catchment. Information gathered by inference – remotely sensed/desktop data
2. Waikato District council given this information. Council may or may not have checked the properties using their own criteria.
3. Waikato District Council used these photographs to notify owners of the land of a SNA being placed on their properties.
3. Owners contacted by Waikato District Council either ignored notification or objected to the SNA
4. Waikato District Council assessed some of the objections using Ground Truthing – information gathered by direct observation. Known as Empirical data/evidence.
5. Those land owners who have not objected – whether or not the SNA is applicable/valid – the SNA remains on their property by default.

The methodology used by Waikato Regional Council and Waikato District Council shows that less than 25% of the objectors sites surveyed using Section 11A and ground truth surveying remained as SNA's. (Waikato District Plan Review: Significant Natural Areas Assessments 17 October 2020: 4 Discussion)

72 James Road, Huntly

Waikato District Plan Review: Significant Natural Areas Assessments 17 October 2020 describes the area as “**Flooded Pasture**” The consultant of this report John Turner recommends: 72 James Road, Amend SNA boundary to exclude areas of **dry pasture**. The pasture is dry except when flooded by Hakanoa Lake in winter due to insufficient flood controls being in place. (D Tate Photos taken between September 2018 and March 2019 showing dry areas ;Council photographs taken 30 July 2020 same area flooded by Hakanoa Lake overflow)

The aim of the site visits (or ground truthing) was to determine if the areas of land within the property identified in the planning maps within the PWDP met the criteria in section 11A of WRPS.

Assessment against Section 11A Waikato Regional Council Policy Statement criteria for determining significant indigenous biodiversity shows **none of the section 11A criteria are applicable** to 72 James Road, Huntly.

Waikato Regional Council Technical Report 2017/36 Appendix III Table 1 Criteria for the Assessment of Significant Natural Areas, details section 11A criteria and the desktop methodology used. **Section 11A criteria none are applicable** to 72 James Road.

John Turner, states that due to the land being flooded, mowed for hay and grazed this creates a habitat for the birds he identified on the day he visited the property. If the land was not maintained the habitat would disappear. The birds are only there due to the flooded pasture and farming practices. It must be noted that his report has not been peer reviewed and these two factors do not meet the threshold of a SNA under other council criteria.

The Waikato District Council or the Regional Council are responsible for the level of Hakanoa Lake. If they did their flood control correctly the pastures at 72 James Road would not flood.

I am sure there is something about this in a by-law or the Resource Management Act that states this is not lawful.

Mr N P Goldwater, Wildland Consultants Ltd, in his statement of evidence for the Porirua City Council 21 August 2020 on peer reviewing submissions before the Independent Hearing Panel gives a definition as “Drained land or land not ‘wet’ all year round is not a wetland” (Response to Submissions: Is Precinct D a wetland? 37-41)

Mr N P Goldwater was a consultant for the Waikato Regional Council in the initial mapping of SNA’s which the District Council is using to determine SNA’s. He has done no ‘ground truthing’ for the Waikato District Council.

The areas deemed to be wetland are in fact dry pasture, occasionally flooded by council, and using the recommendations to Amend SNA boundary to “exclude areas of dry pasture” on 72 James Road Huntly the SNA’s on the property should be removed.

72 James Road does not meet any of the criteria set out for SNA’s under Section 11A by both the Regional and District Councils. They do not meet the criteria under the RMA s6 (a) as a natural wetland area due to the flooding from Hakanoa Lake or a natural habitat for any wildlife.

Therefore, as 72 James Road, Huntly within the PWDP meets none of the criteria in section 11A of WRPS the SNA on the property should be removed.

185B Hakarimata Road

The SNA on this property is part of a bigger SNA incorporating the conservation departments Hakarimata Scenic Reserve. Only the lower slopes were visually inspected for the report presented to Waikato District Council to make their determination on whether a SNA is appropriate for this property.

Using Section 11A Waikato Regional Council Policy Statement criteria for determining significant indigenous biodiversity. The visual assessment of the lower slopes on Hakarimata Road shows that **criteria 3 may be applicable**. However, this is tempered by **criteria 4 and 9** as the indigenous vegetation is not under represented, healthy or a representative example of its type on the lower slopes.

The lower slopes of this property were grazed when it changed ownership 33 years ago. In that time the property has had goats cleared, and sheep no longer graze the property. The lower slopes have been allowed to regenerate with bovine (cows) grazing only to remove the fire risk in the summer season. The only support that has been given for pest control has been from the Conservation Department.

John Turner in his report states that the lower slopes of the property within the SNA does not meet the criteria under Section 11A and does not understand why the boundary was placed where it was. He also states that the **upper slopes of the property may**. He uses ground truthing evidence for the lower slopes to support the incorrect boundary placement and the photographic information from Waikato Regional Council as his basis for stating the upper slopes should be in a SNA. It was also stated in the report that only 35% of the photographic information is correct.

I do not agree that a SNA is required on this property due to the rules and regulations already in place for any development of the property from Waikato District Council. A SNA on this property would place more specific and onerous regulations on the property. Regulations that may specify that I undertake pest control or maintain a fire break at my expense.

A SNA devalues the property and could stop any tourism opportunities could be used to maximise the success of the Hakarimata walk.

However, if a SNA is to be placed on the property, I would like the boundary to be taken back to the upper slopes where the indigenous fauna would trigger Section 11A criteria 3, 4 and 9 fully. I would ask that this boundary change be completed by ground truthing – information gathered by direct observation. This would mean another on-site inspection as to where the healthy vegetation starts indicating the natural boundary of the SNA. The Council could access the Native Heritage Fund, to purchase the land they wish to place in a SNA due to its boundary being the Hakarimata Reserve.

Sources:

<https://www.waikatodistrict.govt.nz/your-council/plans-policies-and-bylaws/plans/waikato-district-plan/district-plan-review/stage-1/hearings/hearing-21a-significant-natural-areas>

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<https://www.waikatoregion.govt.nz/council/policy-and-plans/regional-policy-statement/regional-policy-statement-review/section32/11indigenousbiodiversity/11criteria-for-determining-significance-of-indigenous-biodiversity/>

<https://www.waikatoregion.govt.nz/services/publications/tr201736/>

https://porirua.govt.nz/documents/4003/02.Nicholas_Goldwater_evidence_FINAL_-_33971180_v_1.pdf