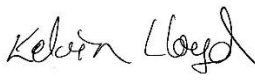




Response to ecological queries raised in Minute 10 of the Hearing Panel, Rocky Point

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1.0 Introduction

Wildland Consultants Ltd (Wildlands) has provided an ecological assessment of effects, including an effects management package, for TKO Properties Ltd, which is seeking resource consent for a development at Rocky Point, near Cromwell. This was addressed in the evidence of Dr Wells and Mr Beale in the consent hearing, and subsequently refined by way of supplementary memorandum from Wildlands dated 16 December 2024 and 10 February 2025 (Wildlands 2024 and 2025 in the reference list below) (which was then the subject of expert conferencing).

Minute 10 of the Hearing Panel has sought clarification from the applicant on three matters, two of which relate to ecological aspects of the application. TKO Properties Ltd have requested that Wildlands provide comment on these matters to assist the Panel.

2.0 Clarifications sought

The relevant clarifications sought by the Panel are summarised thus:

- Removal of Lot 7 from the development footprint - it is not readily apparent to the Panel how the removal of proposed building Lot 7 will mitigate the ecological effects in the absence of any further ecological evidence having been provided on this.
- Ecological management plan – the Panel is unclear on the genesis and purpose of this plan, in the absence of further ecological evidence from the applicant explaining this.

3.0 Response

3.1 Removal of Lot 7 from the development footprint

Lot 7 was proposed for removal by the applicant after the conclusion of joint witness conferencing.

Based on the revised subdivision layout proposed by TKO Properties Ltd in its Right of Reply, the removal of Lot 7 would reduce the adverse effects of the proposal in four ways as outlined below.

1. A reduced development footprint within the cushionfield communities on the western plateau –

The removal of Lot 7 would reduce the overall development footprint within the western plateau at the site. This plateau originally had seven proposed lots (Lots 1-7), so removal of Lot 7 reduces the development footprint in this part of the site by one-seventh. This part of the site contains predominantly indigenous cushionfield vegetation communities with high ecological values. The reduction in the lost area of cushionfield therefore reduces the overall level of ecological effect, and is



thus an additional minimisation measure on top of those already proposed in previous Wildlands assessments.

2. A reduction in the number of individuals of Threatened/At Risk plants and habitat lost to the development –

The threatened plant survey conducted by Wildlands in 2024 found several Threatened/At Risk plant species within Lot 7. These are summarised below, from Table 1 of Wildlands (2024):

Ceratocephala pungens – 5 individuals observed

Crassula mataikona – 5 individuals observed

Myosotis brevis – ‘Locally Common’ in the Lot

Poa maniototo – ‘Occasional’ in the Lot

Raoulia australis – ‘Abundant’ in the Lot

Of note is that Lot 7 had the highest abundance of the spring annual *Myosotis brevis* (Threatened-Nationally Vulnerable) of all the proposed lots, suggesting that the lot provides good habitat for this species.

The removal of Lot 7 from the proposed development footprint would result in the maintenance of these plants (or their habitat in respect to spring annuals), thus reducing the level of effect on threatened plants.

3. An increased area of higher quality cushionfield being maintained through control of colonising woody species -

Lot 7 is within an area of ‘higher quality cushionfield’, as described in Wildlands (2025). If removed from the development footprint, Lot 7 would be added to the adjoining area of cushionfield at Rocky Point already proposed to be maintained through control of colonising woody species (Wildlands 2025). This part of the site (including proposed Lot 7) is presently undergoing rapid colonisation by kānuka; see Plate 1 in Wildlands (2025) for a photograph of this. Its inclusion within the proposed cushionfield maintenance area would therefore provide a larger area of cushionfield maintained for 35 years. After this time the natural successional processes leading to kānuka woodland will be left to take their natural course.

4. Improved connectivity between indigenous vegetation and habitats within the western portion of the Rocky Point site -

Removal of Lot 7 would create a much wider zone of connectivity between indigenous vegetation and habitats in the western part of the site. This would result in a wide corridor across the cushionfield communities on the plateau between the eastern end of Lots 1-6 and the lots further to the east, better connecting the lower slopes of the site with the upper basin and hillsides. This would only be cut by the road that gives access to Lots 1-6. The reduction in fragmentation and increase in connectivity is a further positive ecological effect of the removal of Lot 7.

Summary

In summary, the removal of Lot 7 would provide a reduction of adverse ecological effects that is additional to the mitigation outlined in previous Wildlands reports. This additional reduction comes about through reducing the area of indigenous cushionfield vegetation and habitats affected, reducing the numbers of threatened plants and their habitat removed, increasing the area of higher value cushionfield being maintained through control of colonising woody species, and improving the connectivity between indigenous vegetation and habitats within the western portion of the Rocky Point site.



3.2 Ecological management plan

The ecological management plan provided by TKO Properties Ltd in its Right of Reply (Baxter Design - Planting and Protection Areas) was developed by the applicant based on the additional ecological survey information and recommended mitigation measures provided in the most recent two Wildlands reports (Wildlands 2024 and 2025). The additional two planting areas and cushionfield maintenance areas mentioned in Paragraph 9 of Minute 10 are the additional measures discussed and proposed in Wildlands (2025). As outlined in that report, these measures were proposed to compensate for the ecological values related to threatened plants found in the Wildlands threatened plant survey.

This also provides clarification of Paragraph 10 of Minute 10, as to the genesis of and purpose of this plan. The latest plan arose directly from the ecological evidence previously provided in Wildlands (2024 and 2025), which as mentioned above provided survey information and compensation measures to address the additional ecological values related to threatened plants affected by the development. The genesis of the plan is therefore further explained and detailed already in the ecological evidence presented in the hearing and as further refined and detailed in the Wildlands supplementary memo dated 10 February 2025 (Wildlands 2025). Its purpose is to reflect the recommendations of the Wildlands (2024 and 2025) reports and evidence.

4.0 Conclusions

The ecological aspects of Minute 10 have been clarified in this memo. Removal of Lot 7 from the development footprint was proposed after Wildlands had submitted its ecological reports, and it therefore provides additional reduction of adverse effects to that already considered by Wildlands. This additional reduction comes about through reducing the area of indigenous cushionfield vegetation and habitats affected, reducing the numbers of threatened plants and their habitat removed, increasing the area of higher value cushionfield being maintained through control of colonising woody species, and improving the connectivity between indigenous vegetation and habitats within the western portion of the Rocky Point site.

The ecological management plan submitted by TKO Properties Ltd in its Right of Reply does not require additional ecological evidence. Rather, this plan arose directly from the ecological evidence previously provided in Wildlands (2024 and 2025), which provided survey information and compensation measures to address the additional ecological values related to threatened plants affected by the development.

References

Wildland Consultants Ltd (2024). Concise summary of Threatened/At Risk plant survey at Rocky Point and Bendigo Hills Estate, December 2024. Report 7080d, prepared for TKO Properties Ltd, dated 16 December 2024. 7pp.

Wildland Consultants Ltd (2025). Supplementary information on Threatened/At Risk plant survey at Rocky Point, December 2024. Report 7080e, prepared for TKO Properties Ltd, dated 10 February 2025. 27pp.