

## MEMORANDUM

**TO:** Gregory Dewe, Fulton Hogan Land Development  
**FROM:** Dr Gary Bramley  
**SUBJECT:** Ecology Memo – Fulton Hogan Fast Track Referral Application.  
**DATE:** February 16, 2021  
**CC:** B&A Planning (Nick Roberts, Cassandra Ng, Rachel Morgan, Mary Wong)

### 1. INTRODUCTION

Fulton Hogan Land Development (**'FHL'**) propose to lodge an application for a referred project under the Covid-19 Recovery (Fast-track Consenting) Act 2020 (**'the Act'**) to utilise the fast-track consenting process via an expert consenting panel. This application relates to the development of a contiguous landholding at 86 and 94 Fitzgerald Road, 251 and 383 Waihoehoe Road, 65 and 108 Fielding Road (**'the site'**), which are all owned and controlled by FHL. This landholding forms part of a larger land area within Drury East that is currently subject to a private plan change process (Drury East Private Plan Change (**'PC49'**)) to rezone the land from Future Urban to Business – Mixed Use and Residential zones under the Auckland Unitary Plan (**'AUP'**) which will enable quality urban development and well-functioning urban environments. This proposal for a referred project will give effect to the purpose of the Act to promote employment and New Zealand's recovery from the economic and social impacts of Covid-19 through enabling the construction and delivery of a comprehensive development that offers employment opportunities and an accelerated supply of quality housing choice and diversity.

To support the application for a referred project, this memo provides a high-level review of the ecological aspects of the proposal, including:

- Summary of the proposal and site description;
- Summary of work completed to date;
- High level ecological assessment of proposal; and
- Overview of works required to achieve the proposal.

Each of these matters is set out in more detail below.

### 2. SITE DESCRIPTION AND PROPOSAL

## 2.1 Site Description

FHLD have entered into unconditional sale and purchase agreements for the land which the project will be located on. These agreements provide Fulton Hogan with full control of the sites for development. These sites are 86 and 94 Fitzgerald Road, 251 and 383 Waihoehoe Road, 65 and 108 Fielding Road which is currently zoned Future Urban ("FUZ") under the AUP. The proposed development area is approximately 32.33 ha.



**Figure 1: Aerial map of FHLD fast-track area (Auckland Council Geomaps, January 2021).**

The site is located within the Manukau Ecological District which, together with the Āwhitu and Hunua ecological districts, forms the southernmost portion of the Auckland Ecological Region (McEwen 1987). The land uses at the site include primarily farming and lifestyle blocks. The vegetation at the site comprises exotic pasture, seasonal crops (maize) and exotic and native trees and shrubs planted for shelter, amenity or as part of gardens. The site includes an unnamed stream and its tributaries which drain to Hingaia Stream. These headwater streams and overland flow paths merge near the western end of the site as shown in Figure 2 and continue to flow west to enter the Hingaia Stream which drains approximately northwest to merge with Otuwairoa (Slippery Creek) immediately north of Drury township and ultimately enter the Manukau Harbour via Drury Creek.

The watercourses at the site have been substantially altered by previous land uses and the terrestrial and aquatic ecological values of the site are currently very limited. The streams affected by the fast-track proposal have unrestricted stock access through some parts of their length. There is considerable potential for the ecological values to be restored and enhanced across the site as

it is developed, particularly through the provision of riparian habitats, and for ecological connections to be restored across the wider area via the use of riparian and other plantings.

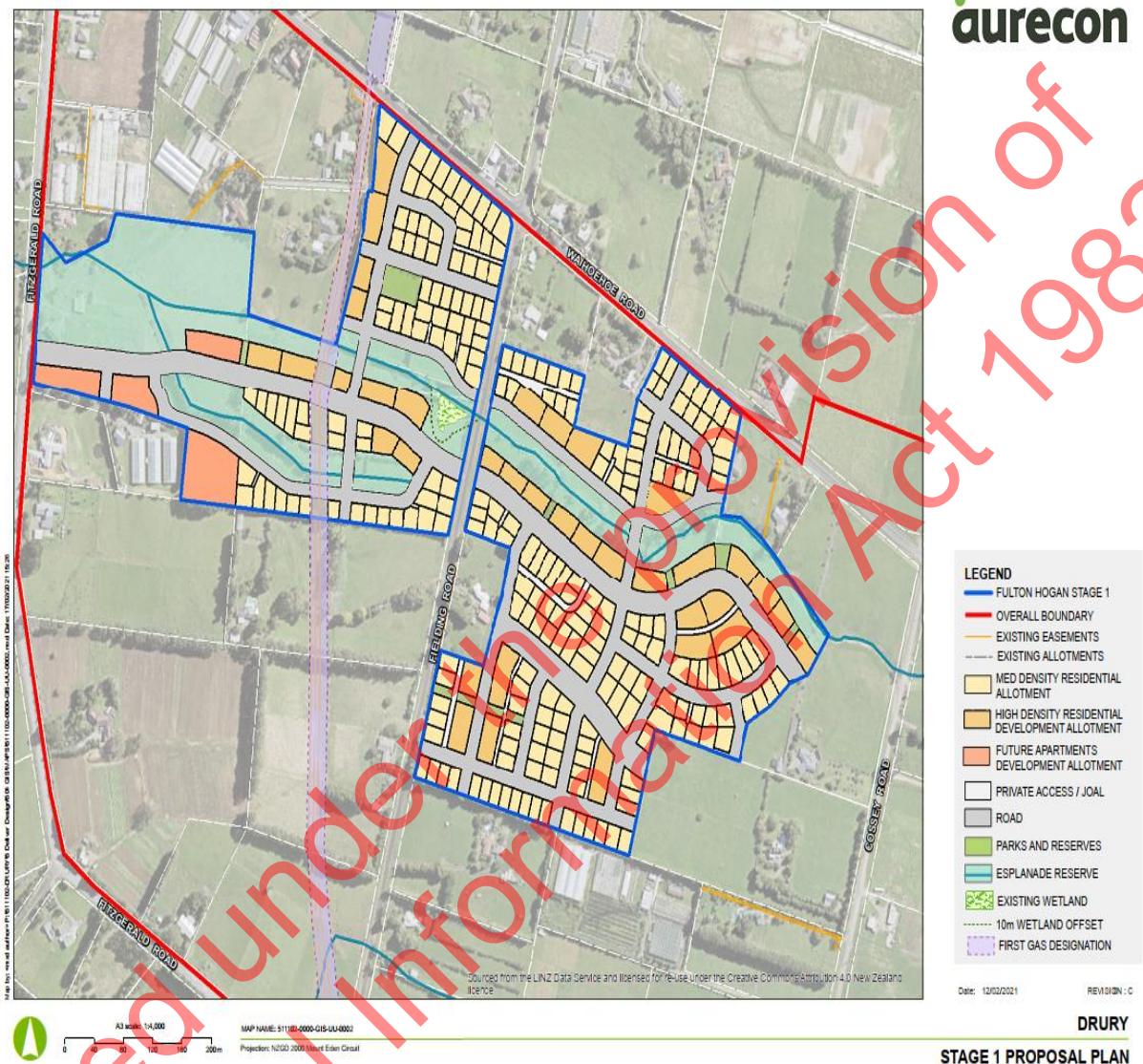


**Figure 2:** Location of headwater streams (blue and purple) within the fast-track application area (outlined in yellow) and the wider PC49 area (outlined in red).

## 2.2 Proposal

FHLD are proposing the staged development of this land into 247 residential lots, 40 residential super lots (being 36 super lots for terrace housing and four super lots for apartments) and supporting roading and servicing infrastructure.

As part of the proposal, the current lack of ecological connection across the site within the Drury – Opaheke landscape will be addressed by the retention of the majority of permanent and intermittent streams across the site combined with riparian planting and ecological restoration. The preliminary concept development plan for the area which is the subject of the fast-track application is shown in Figure 3.



**Figure 3: Preliminary Masterplan of proposed development.**

### 3. BACKGROUND ANALYSIS

#### 3.1 Introduction

The ecological values and potential effects of the proposal have been thoroughly investigated through several site walk overs and ecological assessments. The Ecology Company Limited have reviewed existing documents relating to the ecology of the site and interrogated relevant databases such as eBird, the Department of Conservation bioweb database for herpetofauna and bat records of Auckland Council. We also walked over the accessible parts of the site on 14 February 2019, 3

April 2019 and 28 and 29 January 2021 and participated in consultation with mana whenua (which also included a site visit).

### 3.2 Terrestrial Ecology

The literature review, field work and consultation process confirmed that the terrestrial ecological values of the site are very low. The vegetation is predominantly exotic. There are no records of lizards from within the site (the nearest lizard records are of copper skink (*Oligosoma aeneum*) which is regarded as “not threatened”). Any lizards present could be managed appropriately via a lizard management plan to be implemented as part of vegetation removal as is standard practice in urban subdivisions.

The nearest record of long-tailed bats (*Chalinolobus tuberculatus*) is approximately 3km from the site. It is possible that long-tailed bats may use parts of the site (such as stream edges or mature or post-mature trees) for foraging. Surveys of bats prior to vegetation removal would be undertaken to inform bat management (if present).

No birds of conservation concern are likely to use the site regularly or be dependent on the habitats present for resources. Some birds, such as poaka (pied stilt, *Himantopus leucocephalus*), tarāpunga (red-billed gull, *Larus novaehollandiae scopulinus*) and karoro (Southern black-backed gulls *L. dominicanus*) would make temporary use of damp or disturbed pasture for feeding at certain times of the year (e.g prior to crops being sown), but are not dependent on those habitats.

### 3.3 Aquatic Ecology

The waterways at the site have been extensively modified (e.g. channelized, grazed, impounded in ponds, culverted with perched culverts). Riparian vegetation is effectively absent over most of the area and most of the stream length is unfenced. Stream banks and channels have been affected by stock access, with slumping and bank instability prevalent throughout the site.

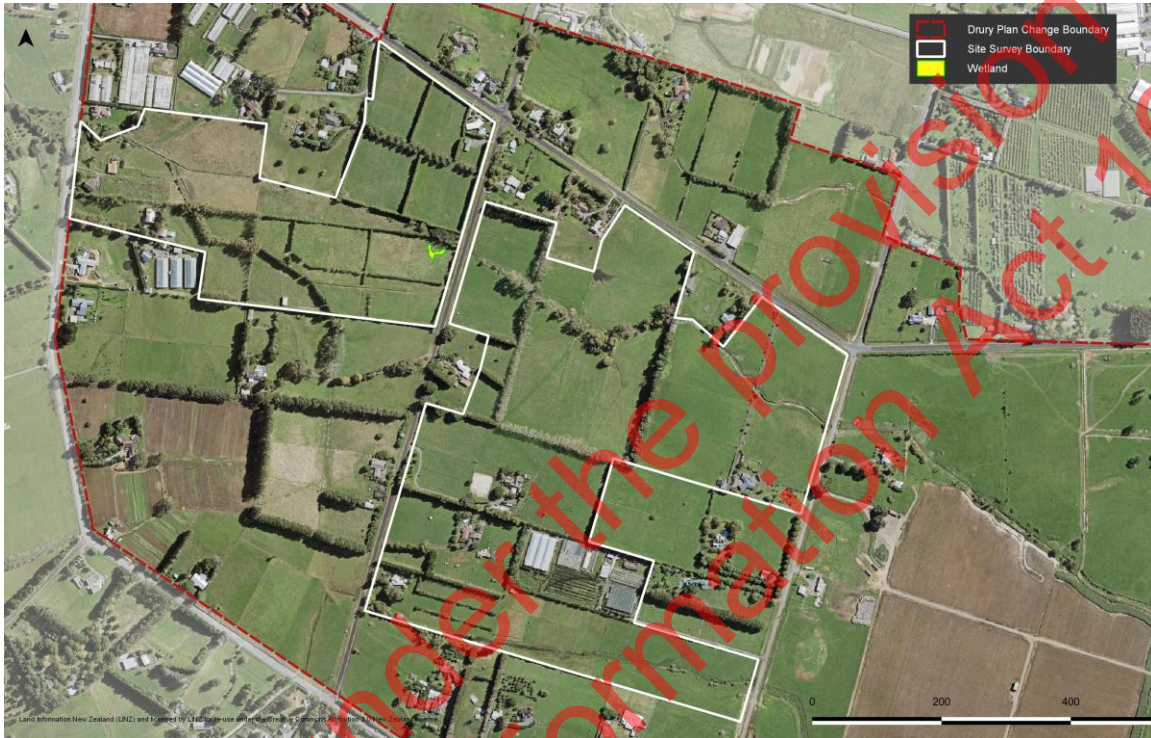
A search of the New Zealand Freshwater Fish Database revealed no fish have been recorded within the streams on site, but eight species of native fish and one species of exotic fish have been historically recorded elsewhere in the headwaters of Hingaia Stream. The streams within the site do not currently provide good habitat for native fish.

The proposed masterplan would remove approximately 20% of the watercourses on site. Where loss of reaches of intermittent or permanent streams cannot be avoided, then that adverse effect needs to be mitigated or compensated for. Compensation for stream removal usually involves riparian restoration of a nearby stream. The extent of any such restoration is determined using the Environmental Compensation Ratio (‘ECR’) formula (Storey et al. 2011). The ECR for low quality Auckland typically generates a value of between 2 and 5.

To date there has not been sufficient detailed design to calculate the final ECR, but given the extent of stream to be retained this is likely to be achievable within the streams on site.

### 3.4 Wetlands

There is one small irregularly shaped area of wetland within the fast-track application site near Waihoehoe Road which would meet the definition of a natural inland wetland as set out in the National Policy Statement – Freshwater Management which came into effect 3 September 2020 ('NPS – FM'). This wetland area is shown in Figure 4.



**Figure 4: Wetland location within the fast-track application area.**

The relevant National Environmental Standards for Freshwater ('NES – FW') set out the activity status and standards for activities relating to freshwater (including wetlands). As set out in Section 53 of the NES – FW, earthworks within a natural wetland area are a prohibited activity if it results or is likely to result in the complete or partial drainage of all or part of a natural wetland. As set out in Section 54 of the NES – FW, vegetation clearance and earthworks within or within a 10m setback from a natural wetland are non-complying activities, as are activities outside, but within a 100m setback from a natural wetland if it results or is likely to result in the complete or partial drainage of all or part of a natural wetland and does not have a status under any of regulations 38 – 51 in the NES – FW. Section 55 of the NES – FW includes general conditions on natural wetland activities to protect natural wetlands. As shown in Figure 3, the wetland area and a 10m buffer have been included within the riparian planting areas and on that basis the wetland identified would not be adversely affected by implementation of the proposed masterplan.

## 4. THE MASTERPLAN

The proposed Masterplan retains the majority (approximately 80%) of the permanent watercourses across the site and protects the identified wetland area, as well as providing an opportunity for riparian restoration, additional wetland creation, improvement of aquatic habitats and reduction of sediment loss from this part of the Hingaia Stream catchment.

## 5. ASSESSMENT

It is considered that there is no ecological reason to preclude acceptance of this application for a referred project.

The development protects the existing wetland and provides the opportunity for re-establishment of ecological connection across the landscape between the remnant forest areas on the slopes east of the site which are identified as significant ecological areas (SEA-T) in the AUP and areas further west, nearest the coastline of the Manukau Harbour.

The construction of new residential dwellings at the site will require vegetation clearance in order to cater for the new land use and associated demands. The very low ecological values of the site include some species (such as lizards and perhaps bats) which, if present can be managed via environmental management plans to be prepared ahead of works and which would be implemented at the time of vegetation clearance. These management plans are anticipated to avoid or significantly reduce any adverse effects on these species.

In the medium – long term it is considered that the masterplan would result in better habitats than exist currently, including more shrubland and higher quality wetland and stream habitats.

With respect to stream removal, it will be necessary to calculate SEVs for the reaches of stream to be removed and potential restoration site(s) since compensation for stream area lost requires this information. Streams removed and enhanced would ideally be located within the same catchment.

Overall, the proposed masterplan would result in an increase in the amount of indigenous habitat and improvement in habitat quality for most species, especially freshwater fish, which currently appear to be absent from the site. It is considered that there are no fundamental issue with the proposed masterplan in relation to ecological matters.

## 6. CONCLUSION

The ecological values of the site and the effects of the proposed masterplan have been thoroughly investigated in a number of ecological assessments and site walkovers to date as well as during consultation with mana whenua.

The proposed masterplan has been designed to minimise ecological effects and there is scope to further refine parts of the design (e.g. stormwater management) as required to further reduce ecological effects. The proposed masterplan will retain the majority of the streams present at the site and provide an opportunity for restoration of these highly degraded habitats as well as the creation of new habitats which will also serve to increase the degree of ecological connection across the site and the wider Drury – Opaheke area as well as decreasing the degree of ecological fragmentation.

Given the proposed design, the application of best practice and implementation of specific environmental management plans (e.g. lizard management) if required, adverse effects should be

able to be minimised and the potential positive ecological effects maximized as a result of the proposal.

A more detailed assessment relating to ecological matters such as SEV calculations and bat and lizard management would be included in any future resource consent application, should the application be accepted as a referred project under the Act.

## 7. REFERENCES

McEwen, W.M. 1987. (Editor). Ecological Regions and Districts of New Zealand (third revised edition in four 1:500,000 maps). New Zealand Biological Resources Centre publication no. 5. Department of Conservation, Wellington.

Storey, R.G., Neale, M.W., Rowe, D.K., Collier, K.J., Hatton, C., Joy, M.K., Maxted, J.R., Moore, S., Parkyn, S.M., Phillips, N. and Quinn, J.M. (2011) Stream Ecological Valuation (SEV): a method for assessing the ecological function of Auckland streams. Auckland Council Technical Report 2011/009.