

30 July 2021

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Dear Sara

**Application APP-2020203164.01 – Grenadier Limited, 765 Muhunua West Road, Ōhau**

Further to your e-mail of 12 July regarding the above application, please find attached an updated Ecological Survey prepared by Boffa Miskell addressing the matters set out in your e-mail.

In relation to irrigation and fertiliser application, the following is a statement from the Applicant's Head of Construction:

*In terms of irrigation, there are some simple irrigation design, and management, things we can do to minimise any overthrow. I also think the fertiliser concern is partly a fundamental misunderstanding of the difference between fertiliser for cropping vs fertiliser for grass retention. For example, in a golf grass situation we try to use the bare minimum of nutrients needed to keep grass cover. Any extra growth means extra mowing and higher costs of maintenance - there is no productivity gain. Fertiliser application, after initial establishment, is almost always low rate foliar applications sprayed on from a height of 50cm through drift reduction nozzles. The point being we do everything we can to stay on target and avoid wastage. The irrigation situation is similar. We try only to water to maintain cover. Any more than that leads to pumping costs, extra growth to mow, and softer play conditions which are the exact opposite to what we are trying to achieve.*

The Applicant is willing to incorporate the above matters into relevant conditions of consent as required.

Should there be a need for any clarification about how this and other methods of implementing ecological enhancement are secured, the Applicant is willing to make its Head of Construction (Brendan Allan) available at short notice to assist your understanding. Mr. Allan has had many years of experience in implementing and complying with RMA conditions associated with golf courses – his most recent being 'The Hills' Course in Queenstown.

Please let me know if Horizons needs any assistance from Mr Allan in 'crafting' specific conditions of implementation.

Please accept this letter and attachments as supplementary information for resource consent application APP-2020203164.01. We trust HRC now has all the necessary information to process and determine this resource consent application. We look forward to hearing from you regarding progress of this application.

Yours sincerely

LAND MATTERS LIMITED



**Tom Bland**

Senior Planner

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Section Schedule 4	Information required	Addressed in the resource consent application?	Response
6(1)(a)	<i>If it is likely that the activity will result in any significant adverse effect on the environment, a description of any possible alternative locations or methods for undertaking the activity.</i>	<p><i>Inadequate.</i></p> <p><i>Details of how identified values will be protected has not been provided with application.</i></p>	<p><b><i>The Ecological Report concludes that the activities will not result in any significant adverse effects on ecological values. The consideration alternative locations for undertaking the activities is not relevant. The conclusions from the Ecological Report are consistent with the findings of the AEE (part 7).</i></b></p> <p><b><i>However, the Applicant has considered alternate locations of the course layout through the process of design. For example, as a result of Jim Dahm's input fairway number 3 has been narrowed and narrowed to avoid 2 stands of Kanuka treeland. Fairway 4 and 17 have been narrowed and redirected as a result of Dr. Boffa's recommendation. Tee 3 has been relocated as a result of Boffa Miskell's report which discovered a small natural wetland.</i></b></p>
6(1)(b)	<i>An assessment of the actual or potential effect on the environment of the activity</i>	<p><i>Not provided in sufficient detail.</i></p> <p><i>The Boffa Miskel report provides a description of the existing environment. However the report does not adequately assess the ecological values present at the site.</i></p> <p><i>No assessment is provided of the actual or potential impacts on biodiversity and ecological functionality of the proposed activities (including potential loss of Schedule F habitat).</i></p>	<p><b><i>Please see part 8.0 of the Boffa Miskell Report which addresses the effects in sufficient detail.</i></b></p>

		<p>No effects management plan or detail on proposed mitigations/offsetting has been provided (to avoid, remedy, mitigate, or offset adverse effects).</p> <p>No effects assessment of the ongoing use and maintenance of the course of Schedule F habitat has been provided – such as green maintenance, irrigation drift, fertiliser drift.</p>	
6(1)(d)	<p>If the activity includes the discharge of any contaminant, a description of –</p> <p>(i) The nature of the discharge and the sensitivity of the receiving environment to adverse effects; and</p> <p>(ii) Any possible alternative methods of discharge, including discharge into any other receiving environment.</p>	<p>Are there any discharges proposed to or affecting Schedule F areas? Such as domestic wastewater and/or from any ESCP control measures? If so, please include assessment of effects on this and the information required by section 6(1)(d) of Schedule 4 of the RMA.</p>	<p><b>Boffa Miskell have been provided a copy of the latest ESCP and report that there will be no significant adverse effects on Schedule F values. The proposed waste water disposal areas for the course are located eastward and inland away from any schedule F area.</b></p>
6(1)(e)	<p>A description of the mitigation measures (including safeguards and contingency plans where relevant) to be undertaken to help prevent or reduce the actual or potential effect.</p>	<p>No.</p> <p>Mitigations measures have not been clearly identified.</p>	<p><b>Boffa Miskell and the Applicant have provided recommendations to avoid and mitigate effects (see this letter and part 8.2.1 of the Boffa Miskell report).</b></p>
6(1)(g)	<p>If the scale and significance of the activity's effects are such that monitoring is required, a description of how and by whom the effects will be monitored if the activity is approved.</p>	<p>No.</p> <p>No assessment has been completed to determine if monitoring will be required.</p>	<p><b>Boffa Miskell note the need to particularly monitor the erosion and sediment control measures along the Ohau River. Section 11 of the ESCP plan (dated June 2021) requires daily monitoring of the measures.</b></p>
Other Item	<p><b>Recommendations</b></p> <p>I recommend that the it is communicated to the applicant the policy implication relating to Schedule F habitat types or areas</p>		<p><b>These recommendations have been provided to Boffa Miskell as part of its updating of the report. It should be noted that policy 13-5 was provided to Boffa</b></p>

	<p><i>shown to be significant indigenous vegetation or significant habitat of indigenous fauna; including obligations in terms of avoiding, remedying, or mitigating adverse effects; and in particular the high bar relating to non-complying activities, and the rigour required to demonstrate a net biodiversity gain (as a potential consenting pathway for both threatened and rare habitat types).</i></p> <p><i>The following documents may be useful to the applicant when preparing the updated Assessment of Environmental Effects:</i></p> <p><i><a href="#">One Plan</a> - specifically <a href="#">Policy 13-5 Criteria for assessing the significance of, and the effects of activities on, an area of habitat</a></i></p> <p><i><a href="#">Ecological Impact Assessment (EclA). EIANZ guidelines for use in New Zealand: terrestrial and freshwater ecosystems, 2<sup>nd</sup> Ed.</a></i></p> <p><i><a href="#">New Zealand Coastal Policy Statement 2010</a></i></p> <p><i><a href="#">NZCPS 2010 guidance notes specifically Policy 11: Indigenous biological diversity (biodiversity)</a></i></p> <p><i><a href="#">National Environmental Standard Freshwater Management Biodiversity Offsetting under the Resource Management Act: a guidance document.</a></i></p>		<p><b><i>Miskell prior to commissioning the original report. It formed part of the information to be considered in the report. Please note also that Dr. Boffa was provided the policy criteria and the relevant NZCPS as part of his joint work with the RBT management plan for the Course. Boffa Miskell have considered that work in its assessment of effects and their overall conclusion is that there will be an ecological gain as a result of the activities.</i></b></p>
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