

Remy Leblanc

Additional Information for Submission on Raiha St SNA128

In two parts A and B

A . We are not happy with the methodology of determining what is an SNA

We presume Wildlands work is implementing Regional Policy Statement Policy 23.

Policy 23: Identifying indigenous ecosystems and habitats with significant indigenous biodiversity values – district and regional plans District and regional plans shall identify and evaluate indigenous ecosystems and habitats with significant indigenous biodiversity values; these ecosystems and habitats will be considered significant if they meet one or more of the following criteria:

(a) Representativeness: the ecosystems or habitats that are typical and characteristic examples of the full range of the original or current natural diversity of ecosystem and habitat types in a district or in the region, and:

(i) are no longer commonplace (less than about 30% remaining); or

(ii) are poorly represented in existing protected areas (less than about 20% legally protected).

(b) Rarity: the ecosystem or habitat has biological or physical features that are scarce or threatened in a local, regional or national context. This can include individual species, rare and distinctive biological communities and physical features that are unusual or rare.

(c) Diversity: the ecosystem or habitat has a natural diversity of ecological units, ecosystems, species and physical features within an area.

(d) Ecological context of an area: the ecosystem or habitat:

(i) enhances connectivity or otherwise buffers representative, rare or diverse indigenous ecosystems and habitats; or

(ii) provides seasonal or core habitat for protected or threatened indigenous species.

(e) Tangata whenua values: the ecosystem or habitat contains characteristics of special spiritual, historical or cultural significance to tangata whenua, identified in accordance with tikanga Māori.

We are not happy with the fact that is that you only have to meet “one or more of the following criteria”. This seems a pretty low bar.

This seems to bring a whole hotch potch of sources from different directions with no systematic framework for evaluation. Nor does it seem to be framed to bring this information into the framework of Policy 23 above.

The Appendices do provide some information as to how different ecosystems should be valued ie rarity status etc.

Appendix 3 is important because it does provide something of an evaluation framework. But note the Policy 23 criteria are a Yes/No trigger only whereas the management criteria are score 1 to 5 as per Appendix 1.

There doesn't seem to be any detail that of what has gone into the Appendix 3 analysis for the site - which is really quite key. All we have is the table on page 31 of the Goldwater Evidence.

This seems very superficial given the enormous effect on the value and potential for the land

B. In response to the Goldwater evidence

1. In the General Comments it says

Māhoe-dominated regenerating low forest and scrub with understorey dominated by Coprosma grandifolia. Some weeds are present, but mainly on edge

It could not really be called forest – it is Mahoe bush mostly with areas of gorse and blackberry.

General comments: The vegetation at the property comprises part of a moderate-sized bush remnant characterised by māhoe-dominated regenerating low forest and scrub.

This is not correct. A bush remnant suggests original bush, but it is clear from this 1979 aerial photo that as recently as then – there looks to be mostly cleared areas (an elderly neighbour said the yellow circled area was completely cleared) and what looks like gorse in most of the site.

The red areas show the only areas with any sort of sized vegetation – but even then they look like just very small bush areas in the valley areas and no large trees. Earlier photos look to show grazing land. There is no “moderate sized bush remnant” visible.



2. The report states the regenerating “low forest” is Mahoe. This is very common in Wellington. We don’t think Mahoe features at all in the Wildland Methodology Report Appendix 1 or 2. Mahoe or whiteywood – this doesn’t fit the expectation of significant native vegetation.
3. *Criterion RPS23B – Rarity: Supports one regionally scarce bird species (bellbird). Contains indigenous vegetation on Acutely Threatened land environments*

But p 19 Wildland Methodology report says – Bell bird – not threatened – localised distribution increasing in abundance. Also, what is the veg that is acutely threatened land environment?

4. *Criterion RPS23D – Ecological context: Significant for connectivity role in the fragmented lowland zone between the Porirua Basin and Rangituhi Reserve / Spicer Forest Hill areas*

There may be some connectivity value but so do well developed areas of Wellington and Porirua. There are plenty of other areas in the vicinity which perform the same function as detailed in our submission. Is this sufficient to lock the land up?

