

**BEFORE THE HEARING COMMISSIONERS
AWANUI**

IN THE MATTER of the Resource Management Act 1991
(**RMA** or **the Act**)

AND

IN THE MATTER of the Proposed Far North District Plan
2022

**STATEMENT OF REBUTTAL EVIDENCE OF DR GARY BRAMLEY
(ECOLOGY) ON BEHALF OF WAIKUA BAY FARM LIMITED**

11 AUGUST 2025



HOLM | MAJUREY

Mike Holm/Nicole Buxeda
PO Box 1585
Shortland Street
AUCKLAND 1140

Solicitor on the record
Contact solicitor

Mike Holm
Nicole Buxeda

Mike.Holm@holmmajurey.nz
Nicole.Buxeda@holmmajurey.nz

(09) 304 0428
(09) 304 0424

INTRODUCTION

Qualifications and experience

1. My full name is Dr Gary Neil Bramley.
2. My qualifications and experience are set out in my Evidence in Chief (2 May 2025).
3. I confirm this evidence complies with the Expert Witness Code of Conduct.

Rebuttal evidence

4. This rebuttal evidence is given in response to the Ecology Review by Phoebe Andrews, and the s42A Report authored by Jerome Wyeth.
5. Ms Andrews raises two matters at [2.1] which I wish to respond to:
 - (a) a question about the wetland identification methods used for the purpose of defining wetlands; and
 - (b) a comment regarding the utility of providing a map of the vegetation, streams, and wetlands in relation to the masterplan to determine where features overlap building areas and accessways.
6. Ultimately Ms Andrews concludes that "the methods are appropriate".

Methodology used for defining wetlands

7. The potential wetlands present on Site were defined in accordance with the delineation protocols set out in the relevant guidelines (Clarkson 2014, Fraser et al. 2018, Clarkson et al. 2021, Ministry for the Environment 2021, 2022, 2022b). The main site visit was undertaken in December 2024
8. The steps involved were:
 - (a) Use of off-site methods (aerial photographs, assessment of existing information relating to vegetation, soils, hydrology, topography).
 - (b) Use of on-site methods (plots) in representative areas to confirm wetland presence.

- (c) Application of the vegetation tests, hydric soils tests and hydrology tests to the plot data.
- 9. Wetlands which would meet the definition of a “natural inland wetland” provided in the National Policy Statement for Freshwater Management (NPS-FM, 2020) were mapped and are shown in Attachment 1 to this evidence.
- 10. Ms Andrews notes that a more detailed assessment would be required at the consenting stage of any future development and I agree. In my view the information provided to date is sufficient for this stage in the process.

Map of waterways in relation to the master plan

- 11. In her peer review Ms Andrews requested a map cross-referencing the indicative development shown on the master plan with the main ecological features onsite. These features are included in Attachment 1 to this evidence.
- 12. Ms Andrews also commented that some ecological features that could be present were not mapped, and referred to ‘Plate 1’ which was not included in the Peer Review Memo which I received. I am therefore not aware of what features she was referring to.
- 13. In paragraph 49 of his planning evidence Mr Tuck notes that the master plan is not proposed to be included as a statutory element of the Proposed Plan, so my understanding is that the additional map does not of itself secure a specific development outcome.
- 14. I note Ms Andrews comment referenced in my paragraph 10 above, with which I agree, that further surveys and a more detailed assessment will be required if and when development proceeds.

Dr Gary Bramley

11 August 2025

REFERENCES

Clarkson BR. 2014. A vegetation tool for wetland delineation in New Zealand. Landcare Research Contract Report LC1793.

Clarkson BR, Fitzgerald NB, Champion PD, Forester L, Rance BD. 2021. New Zealand wetland plant list 2021. Manaaki Whenua – Landcare Research Contract Report LC3975 for Hawke's Bay Regional Council.

Fraser S, Singleton P, Clarkson B. 2018. Hydric soils – field identification guide. Manaaki Whenua – Landcare Research Contract Report LC3233 for Tasman District Council.

Ministry for the Environment. 2021. Wetland delineation hydrology tool for Aotearoa New Zealand. Wellington: Ministry for the Environment.

Ministry for the Environment. 2022a. Wetland delineation protocols. Wellington: Ministry for the Environment.

Ministry for the Environment. 2022b. Pasture exclusion assessment methodology. Wellington: Ministry for the Environment.

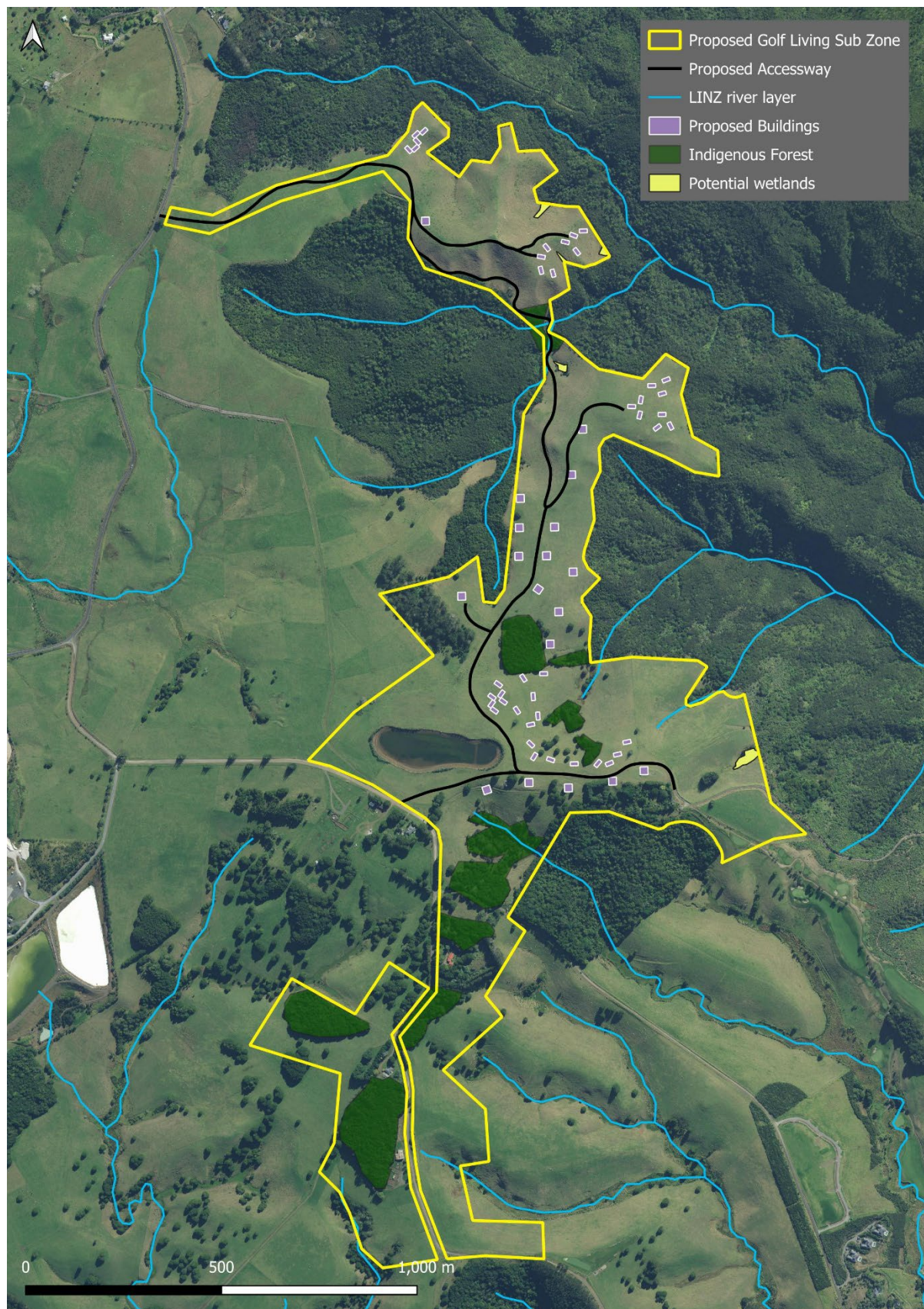
Attachment 1:

Figure 1. Updated ecological features map including indicative layout of potential future housing development.