

## Daniel Thorne | Town Planning Group

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**From:** Jane Macleod <jmacleod@doc.govt.nz>  
**Sent:** Thursday, 5 February 2026 1:25 pm  
**To:** Daniel Thorne | Town Planning Group  
**Subject:** RE: Department of Conservation submission on RC240079 - ACG Properties Limited

Hi Daniel, sorry for the delay in getting back to you on predator control. I have a clearer picture now, from operational and technical staff at DOC, of what type of control would be useful in the area.

The trapping currently being done by DOC in the Paparoa National Park south of the site is aimed at protecting whio, and thus is done along the riverbeds (see map copied below, which shows the locations of the traps in red, with the location of the project site in yellow).

That type of trapping is obviously not appropriate for the project site, but trapping and poisoning of stoats near the spotted shag colony would be very useful.

Therefore, rather than our earlier request that “predator control that is undertaken by DOC within the Paparoa National Park should also be undertaken within the site”, DOC’s preference is for a condition to require the trapping and poisoning of stoats near the spotted shag colony, as described below. The poisoning is necessary because stoats develop trap shyness, breeding up timid stoat genes which need to periodically be removed. Traps on their own cease to protect kiwi and other species after about 5 years. So, a combination of traps and toxins is needed.

### Trapping of stoats

- Run traplines as close as safely possible to the cliffs around the property and at the tops of the terraces/bush edges at ~200m spacing, which would be approx. 10-12 traps. In terms of trap design, this should be DOC 200’s or better, and they need to meet the extended design requirements for protection of weka, kea and kiwi.

### Poisoning of rats and stoats

- Every 3 years, running a poison line (Pest off (brodifacoum)) to target rats and secondary kill stoats.



All the best, Jane

**Jane Macleod**

Senior Resource Management Planner | Kaiwhakamahere penapenarawa

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**From:** Daniel Thorne | Town Planning Group <daniel@townplanning.co.nz>  
**Sent:** Monday, 19 January 2026 9:54 am  
**To:** Jane Macleod <jmacleod@doc.govt.nz>  
**Subject:** RE: Department of Conservation submission on RC240079 - ACG Properties Limited

Hi Jane,

Do you have time today to have a quick run over the feedback? Also, can you advise the predator controls undertaken by DOC within the Paparoa National Park?

Cheers



**Daniel Thorne – Director**

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**From:** Jane Macleod <jmacleod@doc.govt.nz>  
**Sent:** Friday, 16 January 2026 2:24 pm  
**To:** Daniel Thorne | Town Planning Group <daniel@townplanning.co.nz>  
**Subject:** RE: Department of Conservation submission on RC240079 - ACG Properties Limited

Hi Daniel

We have now reviewed the additional information sent through in December, and have the following comments:

**Lizards**

Surveying and assessment:

Although the additional surveying undertaken was short (5 days), DOC agrees with the conclusions drawn from it, and does not consider that further surveying is required. The assessment appropriately acknowledges that although no lizards were found, they may be present.

Conditions:

We support the proposal for an incidental discovery protocol (IDP) for lizards, but seek amendments to strengthen the IDP, as follows:

- There need to be protocols in place if lizards are found – the IDP should identify release sites for lizards, and measures that will ensure the protection of lizards at these new sites
- The IDP should clearly indicate that if any lizards are discovered, a Wildlife Act Authority for their salvage must then be obtained, prior to any handling or moving of the lizards.

In addition, a draft IDP should be prepared before consent is granted, to give greater certainty on appropriate management of effects on lizards.

## **Archaeology**

DOC is happy with the archaeological assessment provided, and comfortable with the conclusions/recommendations of the assessment that the risk of discovery of archaeological material during works should be managed either by an Accidental Discovery Protocol (in consultation with Te Rūnanga o Ngāti Waewae and HNZ) or by seeking an archaeological authority from HNZ in advance, and that (p30):

*Te Rūnanga o Ngāti Waewae should be consulted regarding this assessment and the preferred management pathway (ADP vs Authority). Outcomes may require updates to the report. HNZPT should also be engaged early to confirm expectations.*

*...This assessment is based on the current development footprint and plans. Any future changes to the extent or depth of works must be reviewed to determine whether additional archaeological input is required.*

No further issues from an archaeological point of view, provided the recommendations of the archaeological assessment are followed.

## **Birds**

### Surveying:

DOC is comfortable with level of surveying undertaken. Note that even though kiwi were not discovered, they may still be there (could be incubating). Therefore conditions (e.g. dog and cat ban) should be applied as a precaution.

### Assessment:

We have the following concerns with the assessment:

- The site has high ecological value for birds, as shown by the additional survey work (with nine threatened or at-risk bird species recorded, and an important colony of threatened species on the cliffs). This should be stated clearly in the assessment (section 3.7 or section 5.6).
- Table 3 in section 3.5.1 (Assessment of the site against RPS Ecological Significance criteria) should be updated as appropriate to reflect the findings of the October 2025 surveys – particularly the row on ‘rarity of ecosystems or species’. The additional findings reinforce the significance of the area in terms of this criterion.

- There is no comment on the potential effects of lighting on the shag colony. This may be because of the topography of the site (i.e. it is not considered that lighting effects will reach the colony on the cliff) but this should be made explicit.
- There is no comment on the potential effects from the presence of cats and dogs on the birdlife and other wildlife in and around the site.

Apart from these issues, the revised assessment is appropriate.

#### Conditions:

The following additional conditions are sought:

- Ban on dogs and cats: no dogs or cats to be brought on-site by either guests or staff/contractors
- Ban on drone use: no use of drones on site, unless in consultation with DOC (e.g. for survey work)
- Pest control: predator control that is undertaken by DOC within the Paparoa National Park should also be undertaken within the site.

Lighting management plan:

DOC requests that a draft lighting management plan is prepared prior to consent being granted, to give greater certainty on the protection of a range of TAR bird species from lighting effects.

#### **Summary**

- DOC is comfortable with the additional information provided, in terms of the surveying and assessment for lizards, the surveying and assessment for archaeology, and the surveying for birds.
- Re the assessment for birds, we have some additions that we would like to be made, as set out above, but are otherwise comfortable with the revised assessment.
- We also have requested amendments to conditions for lizards and birds, as set out above.

Happy to discuss,

All the best, Jane

#### **Jane Macleod**

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