

28 October 2022

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Hamilton 3240, NZ

Plan Change 5 – Peacocke Structure Plan Independent Hearing Panel

Attn: Steve Rice  
Email: steve@riceres.co.nz

[waikatoregion.govt.nz](http://waikatoregion.govt.nz)  
0800 800 401

Dear David Hill (Chairperson),

**Waikato Regional Council further hearing evidence – Plan Change 5 – Peacocke Structure Plan**

1. This letter is in response to Directions #6 and #7 of the hearing panel allowing parties to lodge further evidence in response to Hamilton City Council's (HCC) further evidence from 11 October 2022. It also follows my appearance for Waikato Regional Council (WRC) at the hearing for Plan Change 5 – Peacocke Structure Plan on 3 October 2022.
2. I consider WRC has an interest greater than the general public in the matters raised in HCC's further evidence, specifically the supplementary statement of evidence of Mr Sirl which sets out an approach to bat management and wider ecological compensation. While the WRC submission does not directly refer to ecological compensation, it does comment on the policy framework for bats and wider ecological matters. WRC is also directly mentioned in the supplementary statement as a relevant agency likely to be involved in the approach.
3. My understanding of Mr Sirl's supplementary evidence is that there is a desire of HCC to manage bats and ecological values over a wider landscape area than just within Peacocke but that for the purpose of Plan Change 5, a more focused approach is needed which is specific to Peacocke but takes into account the wider landscape scale of bat habitat. As there is no new proposed wording for provisions, I understand that HCC is not recommending further wording changes from that in the s42 report and HCC's initial evidence.
4. I support the position of Mr Sirl insofar as it provides a *potential* approach of how the existing proposed plan provisions could be applied. I expect that other potential approaches will be worked through by HCC at a later date, noting that there has not been a full benefit-cost analysis of the approach set out in Mr Sirl's evidence. I note that the scope for a management strategy and bat ecology panel remains broad and it is not yet clear how this would operate and be resourced in practice and whether it would achieve the compensation outcomes desired. WRC would expect to be involved in these discussions, along with other agencies, before agreeing to a specific approach.
5. There is an obvious need to integrate efforts and expertise in bat management within Peacocke and the wider southern Hamilton landscape and it is important that Plan Change 5 demonstrates commitment to this without obligating parties to an approach that has not been fully worked through yet.

6. I do not comment on the potential funding sources for this approach as set out in the further evidence of Mr Carsten as this is not my expertise. I concur that funding initiatives will require resolution from HCC that are unlikely to be resolved through this hearing process.
7. I still consider that it is not appropriate for this plan change to introduce a city-wide approach to bat management. Any change to, or further details on, the role and scale of the approach set out in the advisory note to provision 1.2.2.27 would need to be further considered by relevant agencies.
8. I do not seek to speak to my position as set out in this letter at a reconvened hearing unless the panel has questions for me.
9. Should you have any queries regarding the content of this letter please contact me directly on (07) 859 2831 or by email [Hannah.craven@waikatoregion.govt.nz](mailto:Hannah.craven@waikatoregion.govt.nz).

Yours sincerely



Hannah Craven  
**Policy Advisor, Strategic and Spatial Planning**

HE TAIAO MAURIORA     HEALTHY ENVIRONMENT  
HE ĪHANGA PAKARI     STRONG ECONOMY  
HE HAPORI HIHIRI     VIBRANT COMMUNITIES