

Plan Change 5

Hearing summary

Dr Sarah Flynn (Ecology), for The Adare Company Limited

28 September 2022

1. I provided a statement of evidence dated 16 September 2022 and a statement of reply dated 21 September 2022.
2. I understand that the evidence has been pre-read by the Panel.
3. I note that in my summary of qualifications and experience I omitted to mention my involvement in the Resource Consent application for the “Amberfield” subdivision within Peacocke Structure Plan Area (**PSPA**). This included ecological evidence in both the council hearing and environment court, in which I addressed the practicalities of biodiversity accounting and developing robust consent conditions to achieve effective ecological management, particularly in relation to adaptive management and pest control.
4. I summarise below the key points I wish to emphasise, after which I am happy to take questions from the Panel.

Summary

5. I agree with the overall mitigation response of buffering and expanding vegetated bat habitat corridors (**SBHAs**) to address the ecological effects of urbanisation and the associated loss or degradation of long tailed bat habitat, as set out in PC5.
6. A biodiversity compensation accounting model (**BCM**) was used to estimate the quantum of land required for restoration and enhancement of habitat values, commensurate with the value and magnitude of effects. Biodiversity accounting models can be helpful tools for clarifying assumptions and extrapolating hypothetical long-term outcomes, but ecological management needs a clear plan for practical implementation in order to manage risk and ensure anticipated outcomes are achieved.
7. I consider that PC5 is over-reliant on BCM calculations to determine landowner contributions and compensate for uncertainty, without first seeking to reduce risk through an over-arching mechanism to secure funding and coordinate enhancement

work. I do not consider that alternative biodiversity accounting models would address these limitations.

8. As proposed, PC5 is likely to give rise to a piecemeal approach to the vesting and enhancement of SBHAs, and creates a risk that development will substantially outstrip implementation of effective mitigation measures.
9. I consider that the ecological objective of PC5 must remain squarely focused on practical measures to achieve effective protection and enhancement of functional bat habitat within the PSPA. This objective requires that the lag between urbanisation and habitat enhancement is minimised. This can be achieved through calculating landowner contributions in advance of development using simple metrics, and Council taking the lead in coordinating habitat enhancement in SBHAs.
10. I agree with Mr Collins and bat experts that the policy framework must integrate PSPA, City-wide, and ultimately Region-wide bat conservation initiatives that are strategic, coordinated, and evidence-based. I consider that strong technical leadership through a City-wide Bat and Habitat Enhancement Panel is essential to achieve these aims.

Dr Sarah Flynn