



## Introduction

1. My name is **Stephen Jesse Marc Gascoigne**.
2. I am the acting Planning Lead for Te Awa Lakes (“**TAL**”) – a master-planned residential, commercial, and recreational development to the north of Hamilton City being delivered by Te Awa Lakes Unincorporated Joint Venture (“**TALUJV**”) and have been engaged to deliver the comprehensive subdivision and related consents for construction of the project on the basis of the consented Land Development Plan (“**LDP**”).
3. I am a Senior Consultant with Aurecon New Zealand Limited, a multi-disciplinary consultancy firm which provides engineering, management and specialist technical services for public and private sector clients. In total, I have eight (8) years of experience as a planner.
4. My experience and qualifications are set out at paragraphs [4] and [5] of my primary evidence.

## Executive Summary of Primary Evidence

5. The following paragraphs provide a summary of my primary Statement of Evidence prepared in respect of the following matters:
  - a. Existing resource consents for vegetation removal at the part of TAL known as Horotiu East North (or “**HEN**”).
  - b. The relevance of the RPS criteria to the extent of the SNA at Horotiu East South (or “**HES**”).

## Existing Resource Consents for HEN

6. The HEN block comprises the north-eastern and largest section of the TAL development area and is subject to granted Resource Consent 010.2021.11468.001 (issued 7 October 2021) for the following activities<sup>1</sup>:  
*“[...] Vegetation and Tree Removal within the Natural Open Space Zone<sup>2</sup>, and the installation of stormwater infrastructure within the Waikato Riverbank and Gully Hazard Area/Flood Hazard Areas [...].”*
7. These activities are subject to a comprehensive suite of conditions, which, amongst other matters, require the consent holder to undertake pre-felling surveys of the affected areas for bat activity (whether foraging or roosting) under

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<sup>1</sup> Decision on Application, pg. 2

<sup>2</sup> Emphasis added

the certified details of an Ecological Management Plan. These procedures are incremental in nature and allow for successive monitoring to occur to enable felling.

8. Hamilton City Council within the section 42A Report identifies further information is required<sup>3</sup> on consented extents for vegetation clearance within SNA's C59 and C76 as they apply to HEN prior to further consideration for removal in accordance with the original submissions made on behalf of TALUJV; this position is carried through in the evidence of Mr Dean<sup>4</sup> and Ms Galt<sup>5</sup> for the Council and it is noted that the Council's experts supported partial removal on the basis that such evidence was provided.
9. Notwithstanding the 'Decision on Application' direction, other references to the spatial extent of authorised clearance of the proposed cSNA's are present in the resource consent and are set out at paragraph [12] of my primary evidence.
10. The spatial extents of these grouped activities have been mapped against the notified cSNA's overlying HEN and the consented clearance extents provided for incorporation into Councils GIS mapping<sup>6</sup>. These areas are also illustrated for the Panel's convenience at **Attachment 1**.
11. This resource consent provides a clear and reasonable expectation of the future and planned environment and ascertains that the values of the affected SNA's are temporary at best.
12. Therefore, because of what is permitted by the resource consents, and based on the documents attached to my primary evidence it is my opinion that SNA C59 (the pines) should be removed in its entirety as it relates to HEN, and that SNA C76 (the riparian vegetation) should be modified in part as it relates to HEN, as per **Attachment 1**. These areas to be removed have been identified in black.

### **HES cSNA Spatial Extents**

13. Representatives of TALUJV, its technical advisors and representatives of Council have engaged in expert conferencing prior to this hearing<sup>7</sup> on the spatial extent of SNA's C59 (the pines and understory within the Southern Gully and adjacent land) and C76 (the riparian vegetation) on the basis of ecological reporting provided

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<sup>3</sup> At Section 5.3.3, pg. 46

<sup>4</sup> At [65]

<sup>5</sup> At [48]

<sup>6</sup> Via email from Ben Tyson (TAL) to Hamish Dean (4Sight) dated 31 March 2023

<sup>7</sup> Via Microsoft Teams, 17 March 2023

with Submission #454 and as those notified areas relate to HES. Details of this reporting are referred to in the evidence of Mr Croft for TALUJV.

14. I note that Council, in the evidence of Mr Dean<sup>8</sup>, supports adjustment to the SNA C59 boundary to remove areas of pre-existing vegetation clearance and vehicle access areas. These areas have been removed on the amended SNA mapping attached at Attachment 1 of Mr Deans evidence. I support that amendment.
15. The Waikato Regional Policy Statement ('RPS') contains criteria for identifying areas of 'significant' indigenous biodiversity contained in Appendix APP5 and Table 28 of the document.
16. I acknowledge that for an area to be identified as an SNA, it must meet a minimum of one or more criteria identified in the table. I rely on the evidence of Mr Croft as to the applicability of these criteria in determining the level of significance of remaining<sup>9</sup> areas of SNA C59 as they affect the HES Southern Gully.

**Stephen Jesse Marc Gascoigne**

**24 May 2023**

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<sup>8</sup> At [62]

<sup>9</sup> following recommended amendments by Mr Dean

**ATTACHMENT 1**



