

BEFORE THE HEARINGS COMMISSIONERS FOR THE WAIKATO DISTRICT COUNCIL

UNDER

the Resource Management Act 1991

AND

IN THE MATTER

of hearing submissions and further submissions on the Proposed
Waikato District Plan

Hearing 25 – Residential Zone Extents

PARTIES REPRESENTED

CSR POKENO LTD

**STATEMENT OF REBUTTAL EVIDENCE OF
JENNIFER CAROLYN SHANKS FOR CSR POKENO LTD
May 2021**

Counsel Instructed:
Peter Fuller
LLB, MPlan, DipEnvMgt, BHortSc.
Barrister
Quay Chambers
Level 7, 2 Commerce Street
PO Box 106215
Auckland 1143
021 635 682
Email: peter.fuller@quaychambers.co.nz

1 INTRODUCTION

My full name is Jennifer Carolyn Shanks, I am a Consultant Ecologist and Director of JS Ecology Ltd, based in Bombay and Associate Botanist with Bioresearches Group Ltd. I have the qualifications and experience set out in my evidence in chief.

Code of conduct

I have read the Environment Court's Code of Conduct and agree to comply with it. My qualifications as an expert are set out above. I confirm that the issues addressed in this statement of evidence are within my area of expertise except where I state that I am relying upon the specified evidence of another person. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

2 SCOPE OF REBUTTAL EVIDENCE

This rebuttal statement supports on ecological grounds the conclusions of the S42A Report prepared by David Mead for Waikato District Council (April 2021) in relation West Pokeno Munro Block.

3 REASONS FOR SUPPORTING THE SECTION 42A REPORT

- 3.1 Detailed discussion of the ecological effects of the proposed development of the site for residential purposes and the expected ecological outcomes is contained in my evidence in chief. Summarized below are my reasons for supporting the conclusions of the section 42A report.
- 3.2 Riverine wetlands, riparian habitats and aquatic habitats present at the site are currently degraded. These habitats will be retained, protected and enhanced as part of the proposed development.
- 3.3 Riparian planting contained in the proposed scheme plan for the site will provide ecological corridors along watercourses which will connect to other areas of native habitat both upstream and downstream of the site.
- 3.4 Proposed off-line stormwater wetlands can provide substantial areas of additional wetland habitat if planted sympathetically with appropriate native wetland plants.
- 3.5 The overall ecological impacts of the development are positive, providing improved aquatic and terrestrial habitat quality and increased areas of indigenous habitat.
- 3.6 The biodiversity values of the site can be maintained and enhanced through the development and implementation of a site-wide Ecological Management Plan.
- 3.7 The development of the site will not negatively impact the Whangamarino Wetland RAMSAR site nor any other downstream habitats such as the Mangatawhiri Swamp or the Waikato River. Sufficient environmental controls exist within the Waikato District Plan, the Waikato Regional Plan and other statutory documents to ensure there are no adverse environmental effects on local ecosystems.
- 3.8 The principle of "No Net Loss" of biodiversity can be demonstrated.

4 CONCLUSIONS

The conversion of rural land to urban use at Pokeno West – Munro Block can be managed to provide significant biodiversity benefits to the site. Currently degraded terrestrial and freshwater habitats can be protected, restored and enhanced as part of the development process, providing biodiversity benefits to the wider landscape.

Jennifer Shanks MSc Hons MEIANZ
Director
JS Ecology Ltd
3/05/21