



Forest & Bird speaking notes for BOPRC Proposed Plan Change 6

Date of hearing: 21 June 2023

Bay of Plenty Regional Conservation Manager: Dr Chantal Pagel

Kia ora koutou katoa,

My name is Chantal Pagel. I am the Regional Conservation Manager for the Royal Forest and Bird Protection Society of New Zealand Incorporated (Forest & Bird) covering Te Moana A Toi Te Huatahi Bay of Plenty. With me is Richard James, chair of Forest & Bird's Tauranga branch.

Today I am speaking on behalf of Forest & Bird in relation to our submission (17) on the Proposed Plan Change 6. While I was not involved in writing the submission, I have reviewed the s42A officer report and sought advice from Forest & Bird's planner. Today I will briefly summarise the purpose of Forest & Bird's submission, provide some additional reasons for relief sought in Forest & Bird's submission and do my best to answer any questions you have.

Forest & Bird's submission and relief sought is intended to ensure the plan provides for the protection, maintenance, and enhancement of the natural environment, including the protection of significant natural areas and natural character, features, and landscapes when planning for urban growth and as a part of our urban environments. Key to this is ensuring that the wording of Plan Change 6 provisions integrate with, rather than creating conflicts with natural environment provisions on the plan.

We are pleased to see that the officer report recommends accepting many of the points raised in our submission and endorse those recommendations. My presentation to the

hearing commissioners today (and these notes) is intended to clarify and provide why further explanations should also be accepted.

Forest & Bird is supportive of intensification of urban environments to reduce greenhouse gas emissions from commuting, other transport emissions, and to provide for adaptation to the effects of climate change. However, intensification has implications for our natural environment from pests and domestic animals. Setting clear limits to where residential intensification can occur is necessary to manage these effects and protect significant indigenous biodiversity.

This is why Forest & Bird opposes the deletion of urban limits within Policy UG 5A and UG 14B. Forest & Bird does not agree with the officer report that removing the urban limits within the Western Bay is the most practical approach to enable more land and infrastructure supply to give effect to the National Policy Statement-Urban Development. This approach is not in accordance with Part 2 of the RMA as it would disregard s6(c) to protect significant indigenous biodiversity and councils' functions to maintain indigenous biodiversity. Rather than planning for growth in appropriate locations this would prioritise urban growth in unplanned locations over protection and maintenance of biodiversity.

Forest & Bird is concerned that, if there are no clear limits for residential development, such unplanned expansions may encroach on areas of significant indigenous biodiversity and special ecological areas and, consequently, threaten their integrity and function. Residential development has the potential for resulting in an increase in domestic pets and exotic garden plants which are a threat to biodiversity. With respect to pest plants, this was highlighted in the 2006 report on significant indigenous vegetation and significant habitats of indigenous fauna in the BOP region:

"In places, residential properties encroach into the site and exotic plants include garden escapes from adjacent properties." (p. 240)¹

¹ Wildland Consultants (2006): Significant indigenous vegetation and significant habitats of indigenous fauna in the coastal environment of the Bay of Plenty region.

<https://atlas.boprc.govt.nz/api/v1/edms/document/A1401473/content>

Maintaining ecological connectivity is crucial to ensure greater habitat diversity, greater species diversity and greater genetic diversity than in a single isolated area. Indigenous forests and shrubs act as an ecological corridor from the coast to the lowland and submontane forests. Wildlife corridors are important because increased species diversity provides greater robustness to climatic events, weed or pest infestations, disasters (e.g. flooding), disease and other factors.² While these factors are recognised in the natural environment chapter of the operative plan they cannot be effectively provided for where limits to urban growth are not included within Plan Change 6 provisions.

In addition, deleting the explanation of Policy UG 5A is unhelpful. That explanation contains many aspects of the reasoning of not allowing ad hoc greenfield development, including certainty for non-urban uses, and that such changes will not be made lightly. Hence, Forest & Bird seek amendment to discourage currently unplanned urban development on greenfield sites.

We appreciate the opportunity to speak at Council today.

Richard and I are now happy to take any questions.

Kia ora.

² <https://www.forestandbird.org.nz/branches/lower-hutt/ecological-corridors-wellington-region>