

**BEFORE THE ENVIRONMENT COURT  
WELLINGTON REGISTRY**

**I TE KŌTI TAIAO  
TE WHANGANUI-Ā-TARA ROHE**

**ENV-WLG-2023-000005**

**IN THE MATTER OF** the Resource Management Act 1991

**AND IN THE MATTER** of the direct referral of applications for resource consent  
and notices of requirement under sections 87G and 198E  
of the Act for the Ōtaki to North of Levin Project

**BY** **WAKA KOTAHI NZ TRANSPORT AGENCY**

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**STATEMENT OF EVIDENCE OF AMELIA FRANCES GEARY ON BEHALF OF  
THE ROYAL FOREST AND BIRD PROTECTION SOCIETY OF NEW ZEALAND INC.**

14 September 2023

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## **INTRODUCTION**

1. My full name is Amelia Frances Geary. I am a regional conservation manager at the Royal Forest & Bird Protection Society of New Zealand Inc (Forest & Bird). My region covers the jurisdictional boundaries of both the Greater Wellington and Manawatū-Whanganui Regional Councils. I have held this position since 2015.
2. My role includes:
  - a. Support of nine Forest & Bird branches to carry out environmental advocacy and conservation projects such as reserve management, restoration planting and events.
  - b. Environmental advocacy through Resource Management Act processes such as submissions on regional and district plans, regional policy statements and resource consents.
  - c. Support for significant conservation projects across the lower North Island.
3. I have held my position at Forest & Bird since February 2015. I have been involved in RMA processes for a number of infrastructure projects including Waka Kotahi's Te Ahu a Turanga - Manawatū Tararua Highway.
4. I have been asked by Forest & Bird to provide evidence on the adequacy of the landscape and natural planting conditions proposed for the Ōtaki to North Levin road.

## **QUALIFICATIONS AND EXPERIENCE**

5. I hold the degrees of Bachelor of Science and Bachelor of Arts with majors in Ecology & Biodiversity, Geography, Environmental Science and Māori Studies and a Master of Science in Conservation Biology with First Class Honours, all obtained from Victoria University of Wellington.
6. I am an author or co-author of four scientific papers in ecology and policy published in peer-reviewed national and international scientific journals.
7. I am a member of the New Zealand Ecological Society, the Wellington Botanical Society and the New Zealand Plant Conservation Network.

## SCOPE OF EVIDENCE

8. In my evidence I cover:
  - a. The proposed conditions for the landscape and natural character plantings;
  - b. The problems with having inadequate conditions for these plantings;
  - c. The need to take a robust approach to landscape and natural character plantings:
    - i. to increase certainty that they will successfully mitigate the landscape and natural character effects of the highway, and
    - ii. to reduce the risk of these areas becoming weed and pest animal sources for the offset sites.
  - d. In my view, a similar approach as is taken to offset plantings should be applied to the landscape and natural character plantings; and
  - e. The fact that there are other reports and evidence that appear to agree with my position.
  
9. In preparing this evidence, I have read the following documents (either in their entirety or the relevant parts):
  - a. Final Technical Assessment D Landscape Visual and Natural Character of Mr Gavin Lister;
  - b. Appendix 7 s87F Report Natural Character of Ms Julia Williams;
  - c. Appendix 2 s87F Report Terrestrial Ecology of Mr James Lambie;
  - d. Appendix 2 s198D Report Landscape, Visual and Natural Character of Julia Williams;
  - e. Evidence of Mr Gavin Lister Landscape Visual and Natural Character;
  - f. Evidence of Mr Nick Goldwater Terrestrial and Wetland Ecology;
  - g. Appendix A to the Evidence of Ms Ainsley McLeod O2NL Conditions Evidence Version Tracked;
  - h. 2023-07-27 O2NL JWS Landscape Visual and Natural Character;
  - i. 2023-08-07 O2NL JWS Terrestrial Ecology;
  - j. Updated Condition Set, 5 September 2023; and

- k. Other relevant documents and literature, cited in the text of my evidence where referred to.

## **EXECUTIVE SUMMARY**

10. The Ōtaki to North Levin highway is the northernmost section of the Wellington Northern Corridor. The two completed stretches of this corridor that are contiguous with the current project are referred to as Pekapeka to Ōtaki and Mackays to Pekapeka.
11. The evidence of Waka Kotahi states they are taking a ‘whole of landscape’ approach to the Ōtaki to North Levin highway project. This suggests that the mitigation, regardless of the effects it is managing, will work together to restore the landscape across the designation.
12. In reality however, the conditions of consent do not treat the planting mitigation consistently. The conditions for the landscape and natural character planting lack detail, and are not ecologically robust. In my view, this means that the natural character and landscape effects won’t be mitigated long term. It also means that these areas may pose a risk to the offset areas, as they could become pest plant and animal sources.
13. In my view, the conditions for landscape and natural character planting should require the same standard of management as the terrestrial offset plantings. The conditions for all restoration planting need to be the same if the effects are to be managed as a ‘whole of landscape’.
14. Evidence of the experts of the councils, and at least one of the Waka Kotahi experts, appears to support this view.

## **WHOLE OF LANDSCAPE APPROACH**

15. The environmental design measures for the Ōtaki to North Levin highway are described as “...integrated as part of a whole of landscape approach through the CEDF (Appendix Three to Volume II) to achieve a whole that is greater than the

sum of the parts.”<sup>1</sup> In my opinion, taking a ‘whole of landscape’ approach to the effects of this project is the correct way to address the impacts of the new highway.

16. However, in addressing the effects of the highway, whether for natural character, landscape or ecological offsetting, the conditions of consent need to be consistent across the mitigation to ensure the long-term restoration of the highway’s landscape is achieved. There is no biological difference between planting planted for terrestrial offsetting or landscape mitigation. Treating them differently and expecting the same or similar outcome makes no sense when these plantings occur in the same landscape and in many cases, right beside each other.
17. Therefore, conditions pertaining to landscape and natural character planting need to be as good as, or better than, those for the terrestrial offset. The landscape and natural character planting conditions, as currently proposed, are much weaker than the offset planting conditions, and provide no certainty that the plantings will be successful.
18. To demonstrate the ‘whole of landscape’ concept, below is an extract from the Planting Concept Plan<sup>2</sup> from the evidence of Mr Lister giving an example of how the ‘whole of landscape’ approach to planting will be undertaken by Waka Kotahi (Fig 1.). The drawing demonstrates how the terrestrial offsetting site (light red) is contiguous with a wetland offsetting site (light blue), which are in turn contiguous with wet forest planting (olive green), a wetland (light blue), tall screen planting (pastel green) and low vegetation planting (green) which are all designed to address landscape, visual and natural character effects.

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<sup>1</sup> Paragraph 203 in Final Technical Assessment D Landscape Visual and Natural Character v2.

<sup>2</sup> Appendix-A-to-the-Evidence-of-Mr-Lister-Updated-Planting-Concept-Plan-6-DOC-SPLIT\_Part1

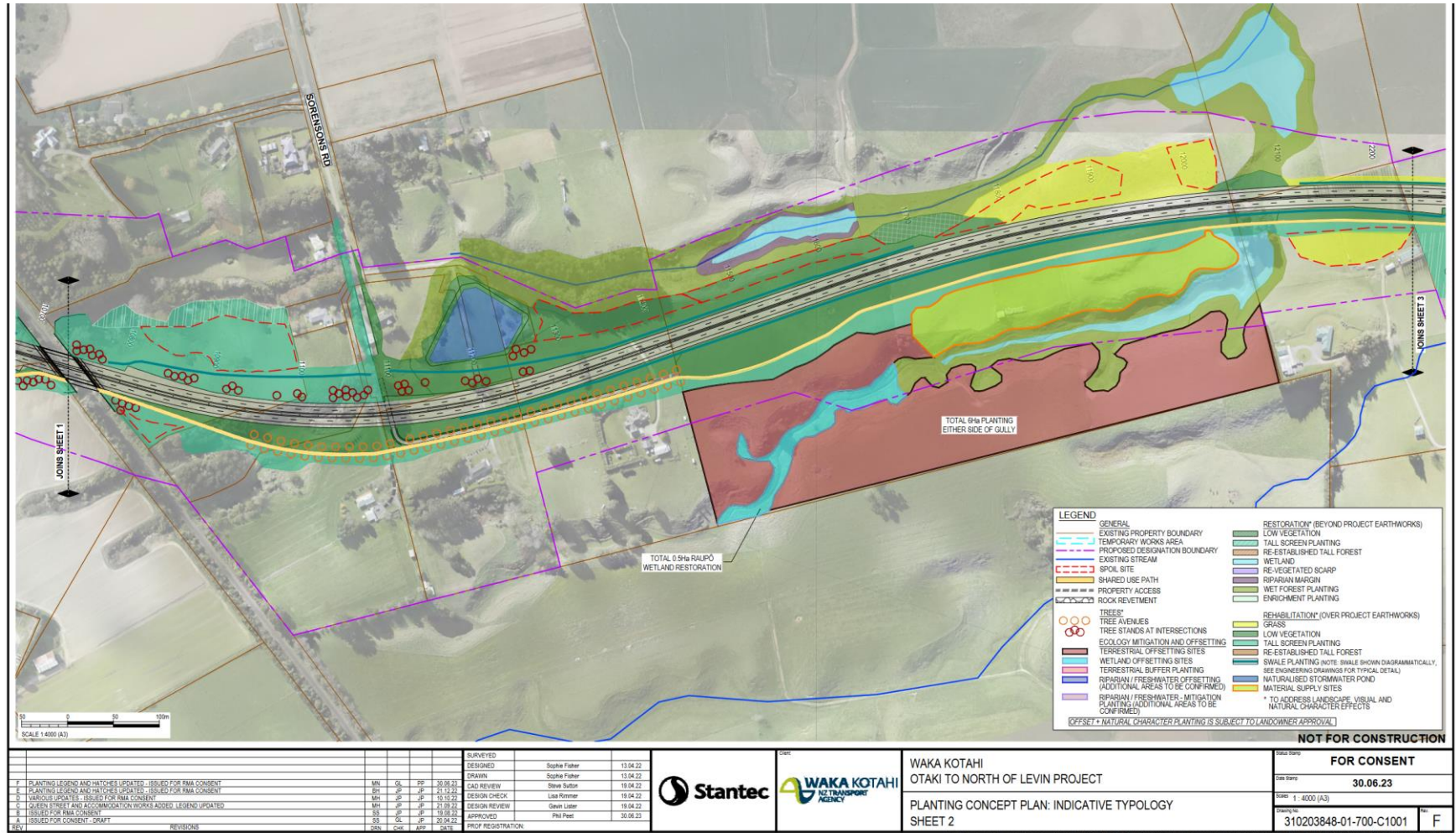


Figure 1: Excerpt from Appendix A to the Evidence of Mr Lister Updated Planting Concept Plan 6 as an example of how the ecological and landscape and visual planting are integrated.

## CONDITIONS FOR LANDSCAPE AND NATURAL CHARACTER PLANTINGS

19. According to the Updated Conditions Set of 5 September, the landscape and natural character planting conditions are currently as follows:

a. DLV1:

### **Landscape planting**

- a) Subject to landowner agreement where the planting is on private property, the landscape planting shown on the Planting Concept Plans: Indicative Typology and the Planting Concept Plans: RMA Purpose Type included in the Application must be undertaken:
  - i. where practicable, prior to commencement of construction activities; or
  - ii. as soon as construction works are completed in the relevant area and seasonal conditions are appropriate; and
  - iii. within eighteen (18) months of the Project being open for public use.
- b) Landscape planting must be implemented, maintained, monitored and replaced to achieve a 90% survival rate and 80% canopy coverage of the ground at five (5) years following the date that initial planting commenced; and
- c) The landscape planting must consist of plant material sourced from the rohe in which it is to be planted or be otherwise sourced from the ecological district of the site.

b. RWB3:

### **Natural character planting**

- a) Subject to landowner agreement where the planting is on private property, natural character planting on the Planting Concept Plans: Indicative Typology and the Planting Concept Plans: RMA Purpose Type included in the Application:
  - i. must be undertaken:
    - A. where practicable, prior to commencement of construction activities; or
    - B. as soon as construction works are completed in the area and seasonal conditions are appropriate; and
    - C. within eighteen (18) months of the road being open for public use.
  - ii. Natural character planting must be implemented, monitored, maintained and replaced to achieve a 90% survival rate and 80% canopy coverage of the ground at five (5) years following the date that initial planting commenced; and
  - iii. consist of indigenous plant material sourced from the rohe in which it is to be planted or be otherwise sourced from the ecological district of the site.

20. These are very different from the proposed consent conditions that manage the plantings being undertaken for the offset. The offset plantings are managed under conditions REM 1-19. The requirements of these conditions include that:

- a. A management plan is drafted and certified for the management of the offset plantings (REM2 and Schedule 7);
  - b. Various targets must be met for the offset planting (REM12):
    - i. Livestock must be removed from the planting areas;
    - ii. Fencing may be required;
    - iii. Pest plants must be absent or suppressed after three years from site preparation;
    - iv. Plantings must achieve 90% canopy cover after 8 years from planting;
    - v. 90% of enrichment plantings must survive, after 5 years from planting;
  - c. Sites for the offset planting must be confirmed before works commence (REM13);
  - d. Site layout plans must be prepared (REM14);
  - e. The plantings are required to be monitored at various intervals over a period of 15 years, and remedial action taken if they are not meeting the targets, or tracking towards net gain (REM19).
21. In my view, the conditions for the landscape and natural character plantings are severely lacking in detail and requirements to ensure that the planting survives beyond five years. In brief, the problems with DLV1 and RWB3 are that:
- a. 80% canopy coverage at five years is not a robust or realistic requirement, and there is no contingency in the conditions if this is not met;
  - b. There are no pest plant or animal requirements;
  - c. There is a complete lack of detail about implementation, monitoring and maintenance of the plantings.
22. I am also unclear whether having the plantings only occurring 'subject to landowner approval' will mean that the effects can be properly addressed.
23. I will return to the detail of the problems with the conditions in a later section of my evidence. However, the key point is that the landscape and natural character plantings need a much improved set of conditions if there is to be any level of certainty that they will successfully mitigate the landscape and visual effects of the highway. They also need improvement to reduce the risk that these areas become



weed and pest sources for the offset areas. In my view, the conditions for the landscape, natural character and offset plantings, should be the same.

**NATURAL CHARACTER/LANDSCAPE PLANTINGS SHOULD BE MANAGED IN THE SAME WAY AS OFFSET PLANTINGS**

24. The conclusion of Waka Kotahi’s landscape expert Mr Lister best summarises the expectation of the project regarding the ‘whole of landscape’ approach to the Ōtaki to North Levin highway:

324. Potential adverse landscape, visual, and natural character effects of the Ō2NL Project have been avoided and reduced to a substantial degree by the selection of the proposed route. Mitigation measures are proposed to address residual individual effects. The individual measures are also coordinated into a cohesive ‘whole of landscape’ approach through the principles within the CEDF – which will guide the detailed design – and which are designed to contribute a positive landscape legacy. I consider this to represent a best practice approach to integrating a new highway into the landscape.<sup>3</sup>

25. This approach is also reflected in Mr Lister’s evidence, when he discusses the natural character planting:

...The landscape workstream ‘natural character’ planting is designed to complement, connect, and extend the ecological planting, typically along streams perpendicular to the highway, to stitch the Project into broad landscape patterns...<sup>4</sup>

26. Taking a ‘whole of landscape’ approach to the mitigation is the correct way to address the impacts of the new highway. Therefore, given that the Ōtaki to North Levin highway is primarily a planting offset, biological equivalence is an important consideration when considering the conditions of consent for ‘whole of landscape’ planting across all aspects of mitigation.

27. From a biological perspective, there is no difference between terrestrial planting whether planted to mitigate the effects of landscape, natural character, stormwater retention or biodiversity loss. This is echoed from a landscape perspective by the Councils’ landscape expert Ms Williams in her s87F report:

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<sup>3</sup> Paragraph 324 of Final Technical Assessment D Landscape Visual and Natural Character v2.

<sup>4</sup> Evidence of Mr Lister, paragraph 64.

36. I agree with the proposed restoration planting measures that improve the natural appearance of gullies, wetlands and riparian margins, as well as the proposed rehabilitation planting to revegetate land disturbed by project earthworks.

37. Issues of terrestrial and freshwater ecological mitigation are beyond my area of expertise. However, any indigenous revegetation that can be seen from the road, bridges or the shared path, improves the natural appearance of the highway landscape. From a landscape natural character perspective, there is little difference between the designated 'ecological mitigation planting' on the margins of rivers and streams, in gullies and around wetlands and 'natural character planting'. Both planting typologies increase the visibility and naturalness of the rivers, streams and associated gullies and wetlands.

38. I also endorse the proposed environmental design measures described in the CEDF that collectively set out a 'whole of landscape approach' to the design, the mitigation of effects of the Ō2NL Project and the long-term restoration of the highway's landscape context.<sup>5</sup>

28. As the Ōtaki to North Levin highway is primarily a planting offset, a 'whole of landscape' approach cannot be addressed by conditions of consent relating to planting mitigation that aren't equivalent. There is no biological difference between terrestrial planting, whether they are required to mitigate the effects of landscape, natural character, stormwater retention or biodiversity loss, therefore the conditions of consent need to be consistent across the different forms of mitigation. Naturally occurring events, such as drought for example, affect terrestrial plantings the same, regardless of what they were planted to mitigate.

29. As stated by Mr Goldwater in his evidence regarding terrestrial and wetland ecology:

160. In my opinion, to ensure the intended outcomes for the offset, the critical period for pest management – particularly pest plants - is during and up to the point where 90% canopy closure is achieved for terrestrial and wetland habitats after eight years (as per REM12). The modelled net-gain outcomes per the BOAM does not rely on in-perpetuity pest animal control.

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<sup>5</sup> Paragraphs 36–38 of Appendix-7\_Julia-Williams\_s87F-Report\_Natural-Character\_28-April-2023. Ms Williams makes similar comments in her s198D Report, at paragraph 45-48.

161. If pest plants and animals are appropriately managed up until the 90% canopy closure standard is met, there is a high probability that the restored habitats will meet key measures used in the BOAMs within 15 years. Such measures include species richness in the canopy and sub-canopy and percentage cover of indigenous species in the understorey and ground tier. I revisit these measures below.

162. As a precautionary measure I am comfortable with adding a condition that requires an annual check of all planted sites for seven years following the eight years of more intensive pest management, i.e., up to year 15. This would be useful in the detection of shade-tolerant pest plant species such as tree privet, sweet cherry, and old man's beard that have the potential to establish in planted areas. This requirement has been added to proposed Condition REM19(e).<sup>6</sup>

30. Mr Goldwater demonstrates an expectation that 90% canopy cover will be achieved after eight years with appropriate pest management. This is backed up somewhat by research. Empirical evidence based on 27 different restoration projects in the North Island suggests 80% canopy cover will likely be achieved sometime between 7.0 and 18.1 years.<sup>7</sup> At one lowland restoration site on the outskirts of Hamilton, 96.6% canopy cover was achieved 9.6 years after planting.<sup>8</sup> Furthermore, research suggests pioneer planting needs to have ongoing weed management if it is cross the threshold of canopy closure.<sup>9</sup>
31. Mr Goldwater acknowledges that shade tolerant pest plants could establish in the plantings after eight years. In my experience, this is entirely likely because the plants (excluding those planted for wetland offsetting) will not be mature after eight years and non-native weeds, whether shade-tolerant or light-demanding, compete aggressively with native planting in restoration situations. For example, there are wilding pines over topping the landscape planting that have achieved 90% canopy cover along the Mackays to Pekapeka expressway in Kāpiti District (Fig. 2). Mr Goldwater's further requirement for annual checks for weeds at REM19(e) is therefore appropriate.

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<sup>6</sup> Paragraphs 160-162 of Evidence-of-Mr-Nick-Goldwater-Terrestrial-and-Wetland-Ecology

<sup>7</sup> Wallace, K.J. and Clarkson, B.D. Urban forest restoration ecology: a review from Hamilton, New Zealand. *Journal of the Royal Society of New Zealand*, 49(3), 2019, pp. 347–369.

<sup>8</sup> Wallace, K.J. et al. Restoration Trajectories and Ecological Thresholds during Planted Urban Forest Successional Development. *Forests* 2022, 13, 199.

<sup>9</sup> Wallace, K.J. et al. Exotic weeds and fluctuating microclimate can constrain native plant regeneration in urban forest restoration. *Ecological Applications*, 27(4), 2017, pp. 1268–1279.



**Figure 2: Wilding pines (circled) growing in the landscape planting on Mackays to Pekepeka. Note the presence of other weeds such as gorse, brush wattle and tree lucerne starting to overtop the plantings.**

32. In light of the expert opinion regarding the terrestrial ecology offsets, the empirical evidence that 80% canopy cover will take between 7.0 and 18.1 years to achieve, and the biological reality that there is no difference between them and the landscape and natural character planting, the conditions DLV1 Landscape planting, and RWB3 Natural character planting, which are much less rigorous than the conditions in REM, will not achieve a 'positive landscape legacy', as referred to by Mr Lister above, in the long-term.
33. In addition, based on the evidence, should the landscape planting not be managed in accordance with the terrestrial offset planting which occur, in most places, alongside each other, then after five years, the landscape planting will be a considerable source of weeds and pest animals into the terrestrial offset. This has been the case at Mackays to Pekapeka. Pioneer planting, such as that in restoration settings, require intensive pest (both weed and animal) management if it is to reach the ecological thresholds of a resilient ecosystem. If the landscape and natural character planting are not managed in accordance with the terrestrial offset then it will be much harder and more costly to achieve the targets in REM.
34. There is no evidence that 80% canopy coverage of the ground at five years following the date that initial planting commenced can be achieved, based on the empirical research. This a considerable oversight in the landscape and natural character planting conditions. Furthermore, conditions DLV1 and RWB3 are silent

on any requirement to manage weeds. In order to achieve a ‘positive landscape legacy’ then all conditions regarding planting, regardless of what they are mitigating, need to be as good as or better than those in REM.

35. To draw again on an example from the Mackays to Pekapeka expressway in Kāpiti District. It is now five years since Final Completion of the project which opened in 2018. The conditions required achievement of 80% canopy cover at time of Final Completion. There was no requirement for ongoing replacement planting, monitoring or maintenance. In the years since 80% canopy cover was achieved, the area within the designation has experienced two ‘extremely dry’ years which occurred in 2019 and 2020.<sup>10</sup> During those extreme seasons, I witnessed the plantings experience extreme stress. Since the time of Final Completion, the ecological offsets and landscape planting have been progressively overtaken by weeds. The landscape planting is now full of grassed areas where the landscape mitigation planting died years ago (Fig. 3). Regardless of the cause of failure, had there been conditions requiring longer-term management, then these plantings would have had a better chance at success.



**Figure 3: Landscape planting on Mackays to Pekapeka expressway where the mitigation planting has died and is now rank grass interspersed with the plants that have survived.**

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<sup>10</sup> <https://niwa.co.nz/climate/information-and-resources/drought-monitor>

36. Along the Mackays to Pekapeka corridor, there are now lengths of the highway where upwards of 30m stretches are dense stands of the invasive Sydney golden wattle *Acacia longifolia* (Fig. 4) which have replaced the plantings that were once there. Other environmental weeds are also present throughout the landscape mitigation, for example, wilding pines, gorse, pampas, brush wattle, blackberry, and exotic broom. In my opinion, the landscape impact of Mackays to Pekapeka has not been mitigated and we can expect exactly the same result on Ōtaki to North Levin if the conditions are not addressed.



**Figure 4: Landscape planting on Mackays to Pekapeka expressway where the mitigation planting has been out competed by brush wattle, Sydney golden wattle, tree lucerne, exotic broom. I estimate the Sydney golden wattle to be over three metres tall in places.**

37. To summarise, the problems with proposed conditions DLV1 and RWB3 are that:
- a. 80% canopy coverage at five years is not a robust or realistic requirement, and there is no contingency in the conditions if this is not met;
  - b. There are no pest plant or animal requirements; and
  - c. There is a complete lack of detail about implementation, monitoring and maintenance of the plantings.
38. The REM conditions provide a much more comprehensive approach.

## **OTHER PARTIES APPEAR TO SUPPORT IMPROVED CONDITIONS FOR NATURAL CHARACTER AND LANDSCAPE PLANTINGS**

39. It appears that the s87F and s198D reports, and the ecological evidence for Waka Kotahi, support the need for improved conditions to ensure the landscape and natural character effects are mitigated.
40. Ms Williams, the author of the s87F Report on Natural Character for the Regional Councils, agrees with Forest & Bird's submission that weed and pest plant control is crucial for survival, and that it 'can and should be appropriately addressed through changes to the proposed conditions'.<sup>11</sup>
41. Ms Williams also states that the conditions should be amended so that:
- a. The Regional Council has a role in managing the natural character plantings;
  - b. Natural character plantings should be included in the Ecological Management Plan, together with the offset planting;
  - c. All plantings, whether for landscape or natural character purposes, should be managed in accordance with an agreed set of specifications;
  - d. The District and Regional Councils should have a role in monitoring the plantings.<sup>12</sup>
42. Ms Williams also comments on the clause in the landscape and natural character plantings, which make that planting 'subject to landowner approval'. Ms Williams states that the sites for the natural character and landscape plantings should be subject to the same requirements as the offset plantings, in terms of confirming that the legal arrangements have been made for those areas before works can commence.<sup>13</sup>
43. Ms Williams makes similar comments in her 198D Report on Landscape, Visual and Natural Character.<sup>14</sup>

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<sup>11</sup> Williams s87F report, paragraphs 64-67.

<sup>12</sup> Williams s87F report, paragraphs 69-72.

<sup>13</sup> Williams s87F report, paragraphs 49-61.

<sup>14</sup> Williams s198D Report, paragraphs 66, 67, 74-78, 91 and 93.

44. The Joint Statement of Landscape, Visual, Natural Character Experts also records that two experts consider that at least the landscape planting provision (DLV1) needs improvement (it isn't clear why the same comment wasn't made about the natural character planting provision, RWB3):

JW (Julia Williams) and SK (Siobhan Karaitiana) consider that more detail is required for quality assurance as part of this project. For example, pest plants are absent or suppressed after 3 years.

SK considers 90% canopy coverage to be more appropriate to minimise weed incursions, as seen on other projects.

GL (Gavin Lister) considers the outline plans as the appropriate stage for detailed specifications.

45. I note that the 90% canopy coverage, and the suppression of weeds after 3 years, are the targets that apply in REM12 to the offset plantings. The experts appear to be seeking that the same standards apply to the landscape plantings. I agree with that approach.
46. Mr Lambie, the author of the s87F report on Terrestrial Ecology for the Regional Councils, says the same thing. Mr Lambie's report is more specific than Ms William's about what should be required for the natural character and landscape plantings:

146. The performance standard RWB3(a)(ii) should be revised to be consistent with the performance standards for terrestrial and wetland offsets (as appropriate for the type of habitat being planted). The terrestrial match was provided in the Waka Kotahi March letter, but the wetland match was not specifically addressed.

147. The performance standard DLV1(b) should be revised to be consistent with the performance standards for terrestrial and wetland offsets (as appropriate for the type of habitat being planted). The terrestrial match was provided in the Waka Kotahi March letter, but the wetland match was not specifically addressed.<sup>15</sup>

47. Mr Goldwater, for Waka Kotahi, agreed with that in his evidence:

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<sup>15</sup> Paragraphs 146-147 of Appendix-2 James Lambie s87F Report Terrestrial Ecology 28-April-2023



184. I am comfortable with Mr Lambie's recommendation that the performance standards in RWB3(a)(ii) and DLV1(b) are revised to be consistent with the performance standards for terrestrial and wetland offsets as per REM12.<sup>16</sup>

48. I am not clear why this has not been carried through into the conditions.

49. The JWS for Ecology only touches on this issue briefly, so it is unclear how much the ecologists discussed it at conferencing. It states:

All agree to include reference in REM19(a) to monitoring of the natural character planting directed under RWB3(a)(ii).

50. This means that the monitoring reports required for the offset at years three, five and fifteen after offset planting, should also include monitoring on the performance requirements of the natural character planting (in RWB3). I do not know why the landscape provision, DLV1, was also not mentioned. In any case, it appears that the ecologists agree that the natural character provision at least, should be monitored.

51. I do not know why this has not been carried through into REM19. In my view, this change would be a good start, but it doesn't cover all the improvements needed to ensure that the landscape and natural character plantings actually succeed.

52. I note that Ms McLeod states that she disagrees that natural character planting should be managed alongside the offset planting, and that managing them alongside each other may confuse the approaches to implementing and monitoring the offset, and inappropriately impose more stringent ecology performance targets.<sup>17</sup>

53. I do not agree that managing the landscape and natural character plantings in a similar way would be confusing. In fact, I think it would be much simpler, given that the plantings are to a large extent, right next to each other. Applying the same management approach would be much *less* confusing. Also, I disagree that it would be inappropriately stringent. The targets are simply there to increase the likelihood that the plantings survive. It makes no sense to have conditions that won't give some certainty of that outcome.

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<sup>16</sup> Paragraph 184 of Evidence of Mr Nick Goldwater Terrestrial and Wetland Ecology

<sup>17</sup> Ms McLeod, Evidence in Chief, paragraphs 25-26.

## **CONCLUSION**

54. The landscape and natural character planting conditions need significant improvement to ensure that they adequately address the landscape and natural character effects, as well as reduce the risk that these areas become pest and weed sources for the offset areas. In my view, the landscape and natural character plantings should be subject to the same targets, requirements, implementation and monitoring conditions as the offset plantings.

Dated 14 September 2023

Amelia Geary