

26 February 2025

DOCCM-7887433

Waipā District Council
By email: districtplan@waipadc.govt.nz

Attention: Waipā District Council Hearing Advisor

Tēnā koe Sir or Madam

Proposed Plan Change 14 – Rezoning part of C10 Growth Cell

The submission of the Director-General of Conservation (DG / submission 12) dated 19 July 2024 included a number of points regarding long-tailed bats. These have largely been accepted in the s42A Report.

The relevant submission points include:

- Guidance for the management of effects on bats through the drafting of a description of the High Value Bat Habitat Area, a Resource Management Issue statement, an objective, and two policies regarding high value bat habitat and long-tailed bats.
- An additional information requirement under Rule 15.4.2.91A(g) to ensure planting, fencing and pedestrian/cycle paths provided as part of the first subdivision are completed with the Mangaone Reserve Management Plan, noting amendment to the name of the management plan under submission point 4/3 to 'Mangaone Stream Reserve Development and Operational Maintenance Plan'.
- Support for a number of provisions in Section 7 and 21 relating to bats (12/8, 12/11, 12/12, 12/15).

Some of the DG's submission points have been rejected.

- The submission requested Rule 7.4.2.36 be amended to ensure the area and extent of the reserve and High Value Bat Habitat Area is in accordance with that shown on the Mangaone Precinct Structure Plan. The DG accepts the explanation for rejecting this in the s42A Report.
- The submission sought removal of the word 'for industrial purposes' from Rule 15.4.2.91A(d). The s42A explanation that removal of these would require minor activities (such as boundary adjustment) to provide the management plan is accepted.
- Submission point (12/14) requested additional assessment criteria regarding long-tailed bat habitat values to manage potential effects from land drainage activities within the Mangaone

Stream and reserve. The DG acknowledges this matter can be addressed at the detailed design stage.

Having considered the s42A Report, all of the recommended amendments relating to bats are supported by the Director-General, while noting the evidence of Ms Andrews for the Waikato Regional Council¹ has suggested two additions – that S27.2.26 and the assessment criteria in Rule 21.2.7.1 both be amended to ensure a 20m buffer around the High Value Bat Habitat Area will be provided.

The Blue Wattle Ecology opinion² in support of Plan Change 14 bat provisions is based on a package of measures that include a ‘built in’ buffer around the High Value Bat Habitat Area.

On this basis the above-mentioned amendments suggested in the WRC evidence are supported by the Director-General.

For completeness Director-General’s submission stands for the panel’s consideration, however, it is considered there is nothing additional DOC would add by speaking at the hearing. As such, the D-G does not wish to be heard at the hearing, but requests this letter be made available to the panel.

Thank you for considering these comments. Please contact Jesse Gooding (jgoodng@doc.govt.nz) if you wish to discuss any of the matters raised in this letter.

Yours sincerely



Niwha Jones
Operations Manager
Waikato

¹ Andrews EIC, paras. [46], [47] and [48]

² Plan Change 14 Application Appendix D2 – Opinion on protection of long-tailed bats and their habitat: Plan Change 14 – Management of Bat Habitat, Bluewattle Ecology, 2 May 2024