

**From:** [info@waipadc.govt.nz](mailto:info@waipadc.govt.nz)  
**To:** [Policy Shared](#)  
**Subject:** External Sender: Waipā District Plan - Plan Change Submission Form 5 - Titanium Park Limited and Rukuhia Properties Ltd  
**Date:** Friday, 28 October 2022 9:50:18 am

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**Full name of submitter** Titanium Park Limited and Rukuhia Properties Ltd  
**Contact name (if different from above)** Nick Grala  
**Email address** n.grala@harrisingrierson.com  
**Address for service** PO Box 5760, Victoria Street West, Auckland 1142

**Contact phone number** 09-9175073

**This is a submission on the following proposed plan change to the Waipā District Plan**

Proposed Privat Plan Change 20 - Airport Northern Precinct Extension

**Could you gain an advantage in trade competition through this submission?** I could not  
**Are you directly affected by an effect of the subject matter that - (a) adversely affects the environment; and (b) does not relate to trade competition or the effects of trade competition?** I am not  
**Do you wish to be heard (attend and speak at the Council hearing) in support of your submission?** I do  
**If others make a similar submission, will you consider presenting a joint case with them at the hearing?** Yes  
**Do you support the proposed change(s)?** I support in part

**The specific provisions of the plan change my submission relates to are (give details):**

Policy 10.3.2.2A and Rule 10.4.2.14A. Details of submission are in the attachment.

**My submission is**

The submission requests that the terminology used in the polices and rules more appropriately reflects the expected nature of the measures which will be required to manage more than minor residual effects on long-tailed bats, recognising that compensation (rather than offsetting) applies where biodiversity gains and losses are not measurable. See attachment for more details.

**I seek the following decision/s from Council**

Policy 10.3.2.2A and Rule 10.4.2.14A are amended in accordance with the attachment.

**Attachments**

## Submission

# ON A PUBLICLY NOTIFIED PROPOSED POLICY STATEMENT OR PLAN

Under Clause 6 of the First Schedule to the Resource Management Act 1991

**TO** Waipa District Council

**SUBMISSION ON** Proposed Private Plan Change 20 – Airport Northern Precinct Extension

**NAME OF SUBMITTER** Titanium Park Ltd and Rukuhia Properties Ltd

**ADDRESS** C/- Harrison Grierson Consultants Limited  
PO Box 5760  
Victoria St West  
**AUCKLAND 1142**  
**Attention: Nick Grala**

This is a submission on Proposed Private Plan Change 20 – Airport Northern Precinct Extension.

Titanium Park Ltd and Rukuhia Properties Ltd (the ‘Submitter’) could not gain an advantage in trade competition through this submission.

### **SUBMISSION IN SUPPORT (IN PART) SUBJECT TO THE FOLLOWING**

The specific provisions of the proposal that the submission relates to is proposed Policy 10.3.2.2A and Rule 10.4.2.14A(a).

#### **1.0 Background**

1.1 The Submitter is also the Applicant requesting Private Plan Change 20.

#### **2.0 Reasons for Submission:**

2.1 The reason for the submission is to ensure the terminology used in the policies and rules more appropriately reflects the expected nature of the measures which will be required to manage more than minor residual effects on long-tailed bats, recognising that compensation (rather than offsetting) applies where biodiversity gains and losses are not measurable.

#### **3.0 The submitter seeks the following relief from Waipa District Council**

3.1 Policy 10.3.2.2A is amended as follows (additions in **bold and underlined**):

10.3.2.2A To maintain or enhance significant long-tailed bat habitat values by requiring the preparation and implementation of an Ecological Management Plan as part of development to:

- where practicable, support the maintenance or enhancement of long-tailed bat habitat and connectivity between habitats;
- mitigate any loss of long-tailed bat habitat and effects on long-tailed bat ecological values; and
- where any effects on long-tailed bats are unable to be avoided or mitigated, ensure that any more than minor residual effects are offset **or compensated** to achieve no net loss.

3.2 Rule 10.4.2.14(a) is amended as follows (additions in **bold and underlined**):

10.4.2.14A An Ecological Management Plan is required to be developed as part of the earlier of the first landuse consent application or the first subdivision consent application (excluding boundary adjustments) for the Northern Precinct. The Ecological Management Plan should contain:

(a) A Bat Management Plan that:

- Identifies all potential bat roost trees within the Northern Precinct;
- Provides an analysis of the practicability of retaining each potential roost tree as part of the development of the Northern Precinct in line with the Structure Plan and identifies any trees that need to be removed, including reasons why;
- Specifies best practice tree removal protocols and mitigation for any potential roost trees that have been identified as needing to be removed, and methods to mitigate associated ecological effects. Where any ecological effects are unable to be mitigated, the Bat Management Plan shall set out methods to ensure that any more than minor residual ecological effects are offset **or compensated** to achieve a no net loss outcome.

...

3.3 No other changes are proposed.

4.0 The submitter wishes to be heard in support of their submission.

5.0 If others make a similar submission the submitter will consider presenting a joint case with them at a hearing.

Signature:



Date: 28 October 2022

**Address for Service of Submitter:**

Titanium Park Ltd and Rukuhia Properties Ltd

C/- Harrison Grierson Consultants Limited

P O Box 5760

Victoria St West

**Auckland 1142**

Attention: Nick Grala

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