



**Submission on Waipa District Council Proposed Private Plan Change 20- Airport
Northern Precinct Extension**

28 October 2022

To:

Waipa District Council

Private Bag 2402

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Email: info@waipadc.govt.nz

From:

Go Eco

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Contact: Ellen Webb, Community Co-ordinator Go Eco

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Trade Competition Declaration

Go Eco would not gain an advantage in trade competition through these submissions.

Hearing Options

We do not wish to be heard in support of this submission. We would consider presenting a joint case with others making a similar submission.

Submission Details

Go Eco is a not-for-profit charity environment centre with a mission to be a voice for the environment, a centre for learning and a catalyst for change. We're a charitable trust with a vision for a healthy environment supported by thriving communities.

We provide community education, collaborate with, and support environmental groups and projects, provide inspiration for living lighter and advocate on behalf of the environment.

In the first instance, Go Eco opposes the plan change but if the Commissioner(s) are still minded to grant the plan change then the changes that have been suggested in the Forest and Bird Waikato Branch submission should be followed.

Ellen Webb on behalf of Go Eco

Bats

- Pekapeka-tou-roa long-tailed bats have New Zealand’s highest conservation status of Threatened – Nationally Critical¹ : ‘most severely threatened, facing an immediate high risk of extinction.’² This means they face the greatest risk of extinction, the same category as the kākāpō and New Zealand fairy tern/tara iti.
- Long-tailed bats have been reduced to today’s isolated populations, one of which is in the wider area around southern Hamilton City and Hamilton Airport. This is one of very few urban areas where long-tailed bats are present: ‘The presence of long-tailed bats in Hamilton is unusual and rare as in other cities they have been lost.’ (For Hamilton, read ‘and wider area including around Hamilton Airport’).
- Due to their critically endangered status, ‘This makes the Hamilton long-tailed bat population important for national species management and conservation.’³ This is the main reason we oppose the Proposed Private Plan Change.
- Threats include ship rats, stoats, possums, cats, habitat destruction, habitat fragmentation and habitat degradation.⁴
- The RMA Section 6(c) requires ‘The protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna’. The proposal in its current form will not achieve this for pekapeka-tou-roa long-tailed bats.
- The large knowledge gaps associated with our native long-tailed bat ecology and the difficulty associated with studying these cryptic species, means that the precautionary approach should be always taken. Furthermore, all adverse impacts should follow the management hierarchy of avoid, remedy, and mitigate and good reasoning should be given if unable to fulfil the levels.
- The issues mentioned above also negatively impact most of our native species, this should also be taken into consideration with all management actions associated within this plan change.

Climate Change

By protecting and enhancing the floristic habitat through both retaining existing and increasing the planting within this area these actions will assist with mitigating climate change.

Highly Productive Soils

As per the National Policy Statement on Highly Productive Land 2022 (“NPS-HPL”) commenced on 17 October 2022, Clause 4.1 requires every local authority to give effect to the NPSHPL on and from the commencement date. Clause 3.5(7) says that until a regional policy statement containing maps of highly productive land is operative each territorial authority must apply the NPS-HPL as if references to highly productive land were references to land that, at the commencement date: is zoned rural but is not subject to a Council initiated notified plan change to rezone it from general rural to urban.

We support that re-zoning, subdivision or redevelopment be avoided until such time as a report to address the effect of the NPSHPL on PC20. This should also be addressed by the Council in its s42A report.

¹ <https://www.doc.govt.nz/nature/native-animals/bats-pekapeka/long-tailed-bat/> accessed 11 October 2022

² Conservation status of plants and animals: Nature (doc.govt.nz) accessed 11 October 2022

³ Project Echo 2021 Hamilton City Wide Bat Survey, Harvey Aughton – Go Eco, nd. p3

⁴ Footnote 3

Go Eco supports the comments, amendments and decisions sought as written by the Forest and Bird Waikato Branch submission in its entirety and within the following provisions:

- 10.2 Resource Management Issues
- 10.3.2.2A Policy-Northern Precinct
- 10.4.2.14A Rules – Ecology
- 10.4.2.14B Rules – Ecology
- 10.4.2.14C Rules – Ecology

Submission Point	Plan selection/provision	Decision Sought	Explanation
1	21.1 Assessment Criteria	Add that the pruning, removal or maintenance of exotic or indigenous trees be a Restricted Discretionary Activity with the appropriate and necessary associated provisions.	Roost trees / habitat or potential roosting habitat must be protected. Any further loss must be avoided. Simply applying tree-felling protocols is insufficient for bats as highly mobile, critically endangered species, whose roost trees are already in short supply. Furthermore, many of our other native fauna also use similar habitat and therefore would also be negatively impacted.
2		<p>Pest control needs to be part of the Ecological Management Plan, covering all the introduced predators of bats: rats, stoats, cats and possums.</p> <p>Furthermore, the Management Plan should also include annual biodiversity monitoring/surveys following DOC best practice, especially for long-tailed bats.</p>	<p>Roads bring pests. People and our food waste (lunch scraps etc.) bring pests. Predation and competition for resources and habitat are a major issue for bats, therefore predator numbers must be controlled for.</p> <p>Monitoring is critical in ensuring observing general trends. Monitoring will ensure that, at the very least, observed trends are being maintained and if there's a trend change towards declining relevant reviews can be made to ensure avoidance of adverse impacts.</p>