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Subject: External Sender: Waipā District Plan - Plan Change Submission Form 5 - Katherine Hay
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This is a submission on the following proposed plan change to the Waipā District Plan

Waipā District Council Proposed Private 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 not

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 oppose

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

Bats, climate change and high value soils

My submission is

see attached

I seek the following decision/s from Council

Decline the application in its current form.

Attachments

[Waikato Branch Submission to Plan Change 20.docx](#)

October 28, 2022

Submission on Waipā District Council Proposed Private Plan Change 20: Airport Northern Precinct Extension

This submission is on behalf of the Waikato Branch of the Royal Forest and Bird Protection Society. This submission supports, and should be read in conjunction with, the submission from Barbara Hammonds of the Royal Forest and Bird Society.

Forest & Bird's Waikato branch has over 600 members and covers the area from Port Waikato and Huntly in the north, west to Raglan and Kawhia, east to the Kaimai Ranges and south to Otorohonga.

The branch also manages the Walter Scott and Morgan Reserves, which have important conservation values in the Waikato.

The key areas of interest to the Waikato Branch relate to bats and bat habitat, loss of high class soils/highly productive land and climate change.

Bats

Bats are a nationally critical threatened species and the population in southern Hamilton is important ecologically and genetically. Bats are also an important part of the Hamilton area's identity. The new bridge across the Waikato River has no central pier in the river, in part to provide large areas underneath where bats can fly. The Hamilton Airport's new terminal design and branding includes design elements that represent Pekapeka's roosting nests and sonar waves.

It is striking then that the Assessment of Ecological Effects for bats is so inadequate. For example, its findings focus on mature trees and shelters belts, without addressing the use of the site by bats for foraging and commuting. It does not appear that bat surveys were done during the breeding season of December/January or that adequate surveys were done on the Rukuhia Properties Limited property. We believe it is likely that bats may roost in neighbouring properties and use the affected area as foraging grounds. A wider landscape approach to the assessment of impacts on bats is needed.

We strongly believe that a more comprehensive assessment is needed to determine the true impact on bats of this plan change.

Soils

The National Policy Statement for Highly Productive Land (NPS-HPL) is now in effect to protect highly productive land for use in primary production. The proposed plan change needs to consider and address the relevant objectives, policies, and methods of the NPS-HPL.

The Waikato Regional Policy Statement also has provisions related to soils that do not seem to have been considered in the proposal.

Climate Change

We found no reference to climate change or transport emissions within the plan change. Surely, if increased industrial activity is being facilitated by this plan change it should include provisions to address climate change and carbon emission reduction goals. New Zealand must include climate

change in all policy documents or plan changes to help achieve the transformational changes necessary to avoid climate disaster.

Thank you for the opportunity to make a submission on the Proposed Private Plan Change 20 – Airport Northern Precinct Extension to the Waipā District Plan.

Contact: Katherine Hay

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