



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

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1. Trade competition declaration

The Riverlea Environment Society would not gain an advantage in trade competition through these submissions.

2. Hearing Options

We wish to be heard in support of this submission. We would consider presenting a joint case with others making a similar submission.

3. Submission Details

1. The Riverlea Environment Society Inc (RESI) is a voluntary community society that primarily works to restore Hammond Park, which contains a small remnant bush area in the Riverlea area that has high biodiversity values. It is located in the south-east of Hamilton. The restoration includes weeding, planting and pest control.
2. We are concerned that the proposed development will further contribute to the local extinction of pekapeka-tou-roa, the long-tailed bat, which is at nationally critical risk of extinction.
3. Annual surveys by Go Eco/Project Echo consistently show three particular long-tailed bat 'hotspots': Hammond Park, Sandford Park and Tamahere. Bats are commute between these three areas, and this includes movement across Peacocke. Those surveys do not include the airport region, but other surveys have shown it to be well-used by bats, particularly for breeding. These are likely to be the same bats using the south-eastern areas of Hamilton.
4. RESI was involved in the resource consent hearings for the Amberfield resource consent application and Hamilton City Council plan change 5 (Peacocke) hearings. It was a party to proceedings for the Amberfield Environment Court case. (The interim decision of this case is [here](#) and the final decision [here](#)).
5. The Environment Court was similarly concerned about the local extinction of bats, although it was unable to refuse the resource consent because no party sought that outcome (because the land had long been planned for urbanisation). Therefore, the Amberfield resource consent conditions require stringent mitigation conditions that attempt to enable the bats to thrive, although this outcome is uncertain and experimental.
6. The ecology report by Tonkin & Taylor is not prepared by a bat ecologist and skips over major aspects of the mitigation required by the Court in conditions of the Amberfield

resource consent. These include the need to vest large areas of land as reserves with the primary purpose of preserving and enhancing bat habitat; mass planting of thousands of trees; dense planting for light screening; bespoke bridge and road-crossing designs; and predator control.

7. We note with concern that shelterbelt trees on the airport site were “... removed between 12 and 19 November 2021 for safety reasons as part of farming operations” despite the fact that the shelterbelt “was utilised by bats as a flyway and anticipated by the current Airport Business Zone as this covers more than half of the Hub area”, according to the ecology report. When the trees were removed, the importance of the trees as a flyway was already known because two surveys undertaken for the purposes of preparing for the proposed development had taken place (in February, March and April of 2020, according to the report). We are concerned that the landowner removed these trees despite making plans to cease farming operations and instead develop the land. This does not suggest a commitment to conservation.
8. There is a commitment to carry out proper tree-felling protocols if the development proceeds, which prevents outright killing of bats. However, this provides false reassurance, because the felling of roost trees removes bats’ ability to rest and rear young, which is likely to effectively kill them slowly. New roost trees take decades to grow, and any promise to install bat boxes as substitutes is meagre – bat ecologists are doubtful about the success of these to act as substitutes to roost trees.
9. The local extinction of pekapeka-tou-roa would be a great cultural loss. Hamilton airport, for example, celebrates this local species: Maori design specialist Te Hira infused the terminal ceiling and floor design with cultural references to Waikato Awa (Waikato River) and Pu korero (deep history) of Pekapeka-tou-roa, [according to](#) the Cambridge News.
10. The potential for the proposed development to be the final blow to pekapeka-tou-roa locally; the impending urbanisation of Peacocke means that habitat in the south-eastern area of Hamilton will soon be drastically altered.
11. We oppose this private plan change. Paving over pasture, removing trees, and introducing light and noise, will comprise an enormous change to habitat used for foraging, roosting and breeding. Section 6c of the RMA requires protection of significant habitat of indigenous fauna, and this plan change will achieve the opposite.