



Submission on Private Plan Change 57-Calcutta

9 October 2022

To:
Matamata-Piako District Council
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From:
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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, feral and domestic 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.
- It is concerning that there has been a lack of biodiversity surveys (specifically for Long-tail bats) and any ecological effects mentioned are only in relation to stormwater. These lack of surveys and minimal ecological effects mentioned, means that "...any adverse ecological effects on the Mangawhero Stream and environs, that arise from the plan change, are acceptable" is implausible. **The absence of evidence does not indicate evidence of absence.**
- The absence of evidence does not indicate evidence of absence is an especially important point when considering the survey undertaken in Cambridge East April 2022 for Waipa District Council. In this survey, the high level of activity detected on the automated bat monitor (ABM) Wai36 suggested roosting was occurring in London planes. This is of particular interest as it indicates that bats will inhabit a location with limited vegetation around and the nearest natural habitats being quite far away with Karapiro Gully c. 2 km to the south and Maungakawa Scenic Reserve c. 2.6 km to the east. Therefore, with the proposed rezoning and development being located adjacent to the Mangawhero Stream and associated vegetation, plus the row of pine-oaks along Tauranga Rd and the pasture with some existing trees present, these could be potential bat habitat therefore there is a high chance bats will be present.
- If bats are present: all foraging habitat, well vegetated corridors (migratory and foraging pathways), roosting habitat must be protected, and light and noise impacts must be fully avoided.

- The threat to these Nationally Critical species is the main reason we oppose this Private Plan Change unless bats can be shown not to be present through a methodologically robust survey.

Early involvement of expert bat ecologists

- Specialist bat ecologists need to be involved in Plan Change processes from the earliest stages, before roading and other infrastructure plans are made, to protect bat habitat, including commuting flyways and important foraging areas, from destruction, degradation and fragmentation.

Bat Management Plan

- If bats are detected, any Bat Management Plan needs to be written by a suitably qualified bat ecologist and approved by a DOC appointed bat ecologist.

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.

The Manaaki Whenua Landcare Research interactive maps indicates the plan change is LUC-1 to LUC-3. This means the NPS-HPL, until the Waikato Regional Policy Statement indicates otherwise, applies, at least to part of the 41 ha of rural zoned land and is to be treated as highly productive land.

We support that re-zoning, subdivision or redevelopment be avoided until such time as a report to address the effect of the NPS-HPL on PC57. 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:

- Submission point 1- the application
- Submission point 2- 18 General Industrial Zone
- Submission point 3- Bat Habitat Significant Natural Features / Areas

Further submission point(s) below:

Submission Point	Plan selection/provision	Decision Sought	Explanation
1	18.4 Activity Status Rules	Add that the pruning, removal or maintenance of exotic or indigenous trees be a Restricted Discretionary Activity with the appropriate and necessary associated provisions ie appropriate height and width.	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	Amenity plantings	Any amenity plantings undertaken should also have the impact of increasing benefits to native biodiversity.	New Zealand's productive landscapes are invariably dominated by agricultural, horticultural, and exotic forestry land-uses which cover up to three-quarters of our landmass. Much of this human-induced change of land-use has been to the detriment of indigenous biodiversity. Planting native species will overall enhance our wildlife and general biodiversity within this landscape.