

**BEFORE HEARING COMMISSIONERS**

**APPOINTED BY THE HAMILTON CITY COUNCIL**

**IN THE MATTER** of the Resource Management Act 1991 **(RMA)**

**AND**

**IN THE MATTER** of Plan Change 5 – Peacocke to the Operative Hamilton City

District Plan

Local Authority

**STATEMENT OF HARVEY AUGHTON**

**03 October 2022**

## Summary

My name is Harvey Aughton. I am a community coordinator working at Waikato Environment Centre (Go Eco) and I am presenting on behalf of my employer. In my role, I have been contracted over the past two years to be the community coordinator for Project Echo – a bat conservation and advocacy group, and Predator Free Hamilton.

In my respective capacity in both roles, I have been involved in coordinating community and volunteer-driven projects which have worked to protect bat roost trees, contribute to controlling predators, and provide members of the public with information about bats in Hamilton.

In this statement I will cover:

1. My involvement with the community and concerns regarding the hearing process.
2. The work I have been involved with concerning bat surveys
  - a. Including an ongoing predator issue within bat habitats.
3. Concerns I have regarding the ongoing issue of vehicle headlights.
4. The importance of bat roost tree protection.
  - a. Including a comment on artificial bat roosts

## Hearing Process

1. I am here giving this presentation in my capacity as an employee whose job it is to coordinate with community group members. As a community coordinator I have been focused on working with volunteers to achieve biodiversity outcomes within Hamilton City. Through my work, I have contact with numerous communities led conservation projects, and I have worked with schools and the museum to provide informative education about bats. This is a unique role which I have because bats persist in Hamilton City. I have also worked alongside iwi and hapu on projects in the Hamilton gully system.
2. I note that the commission has previously heard from Andrea Graves who commented that there is an unequal burden placed on concerned residents and small conservation groups when it comes to these proceedings – including Riverlea Environment Society. She also notes that Hamilton City Council and the Department of Conservation (DoC) are funded by ratepayers and taxpayers respectively. There are increased pressures put on all these parties when blanket requirements are not put in place, as there will be the continued need for expensive proceedings involving courts and

commissioners. This certainly puts an unfair burden on residents who must volunteer their time and tight resources in opposition to private companies with vastly larger resources.

3. This hearing process must result in the best possible protection for bats in Hamilton as well as blanket requirements to be put in place so that residents and community groups are not required to expend time and energy in hearing processes each time there is a resource consent application.

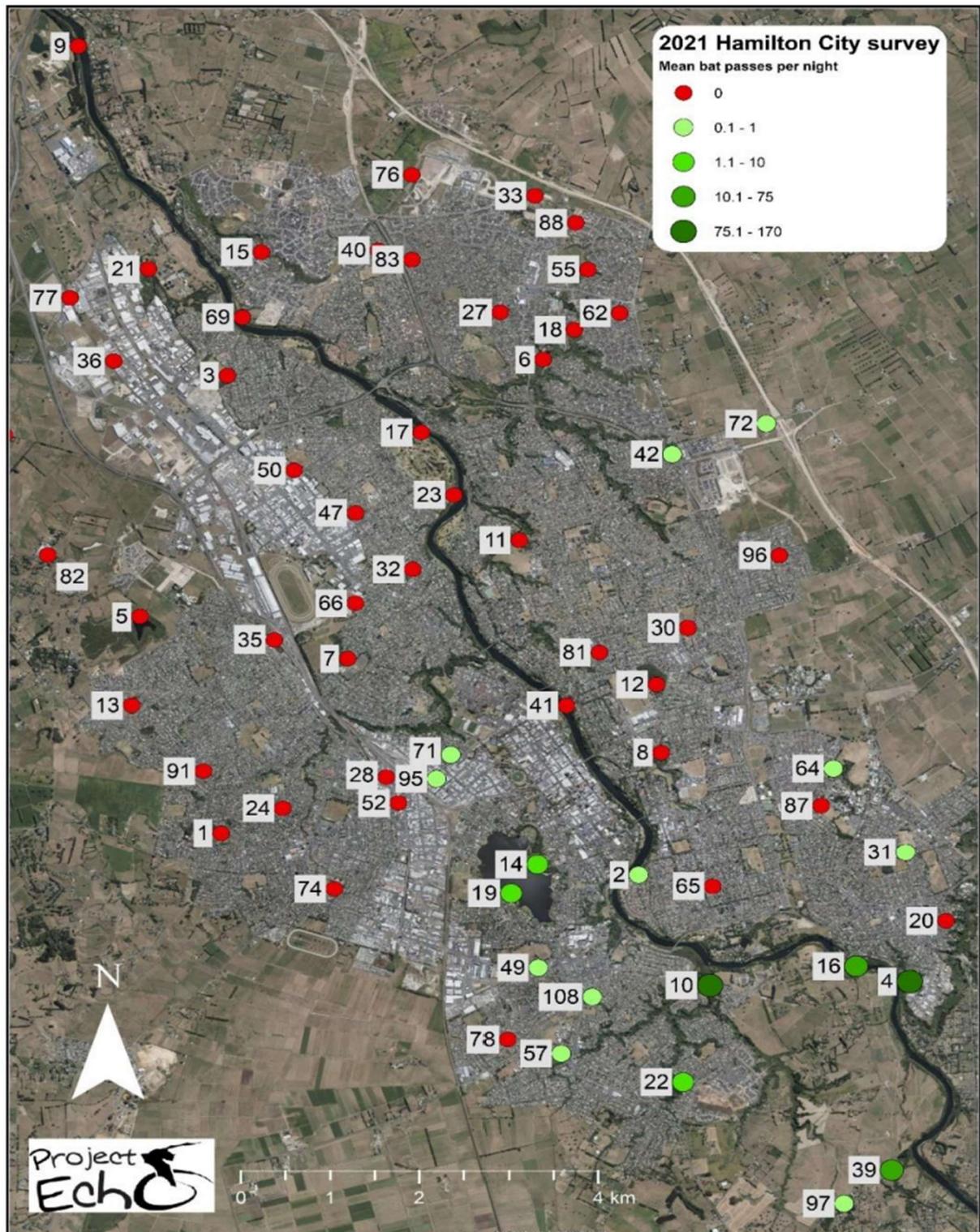
## City-Wide Bat Surveys

4. While I am not presenting as an expert in these proceedings, I would like to speak to the Project Echo City-Wide Bat Survey (Figure 1, overleaf)<sup>1</sup> which was presented during the evidence given on behalf of DoC, as well as in the statement of Andrea Graves. For the last two years, I have been responsible for deploying acoustic monitors for the Project Echo City-Wide survey. Placements were informed by a master sample model provided by DoC.
5. The survey provides an overview of bat presence in the city and shows that the vast majority of bat activity is in the southern edges of the city, particularly in the Mangakotukutu Gully – within the Peacocke area – and Hammond Bush. Site 10 and 4 on the map accounted for 88.2% of bat activity within the survey (5,196 passes).
6. Evidence has been given by DOC and others demonstrating that bats have a large home range and are strongly connected to the landscape they inhabit. These two hotspots in the survey are connected by the Waikato River, Mangakotukutuku Gully the Peacocke area, through which bats commute to foraging sites and important roost sites. If there are not correct provisions and requirements put in place then there is a risk that the population that inhabits the Peacocke area may not persist. Therefore, there is an urgent need for the best possible protection of existing and future habitats.
7. It is worth noting other parts of the map in the northern parts of the city. Site '42' is at what can be considered the entrance to Mangaiti Gully – an area which is comparably well restored by Hamilton City Council, the local Restoration Group, and a Jobs for Nature project. However, although the point is green, I would like to stress that the site observed 1 bat pass over the entire 3-week monitoring programme. The same point can be made for sites 64, 31, 72, and 64, which observed very low bat activity. This demonstrates that there the most important area of habitat and wider landscape to protect within the city is within or connected to the area which is to be developed.

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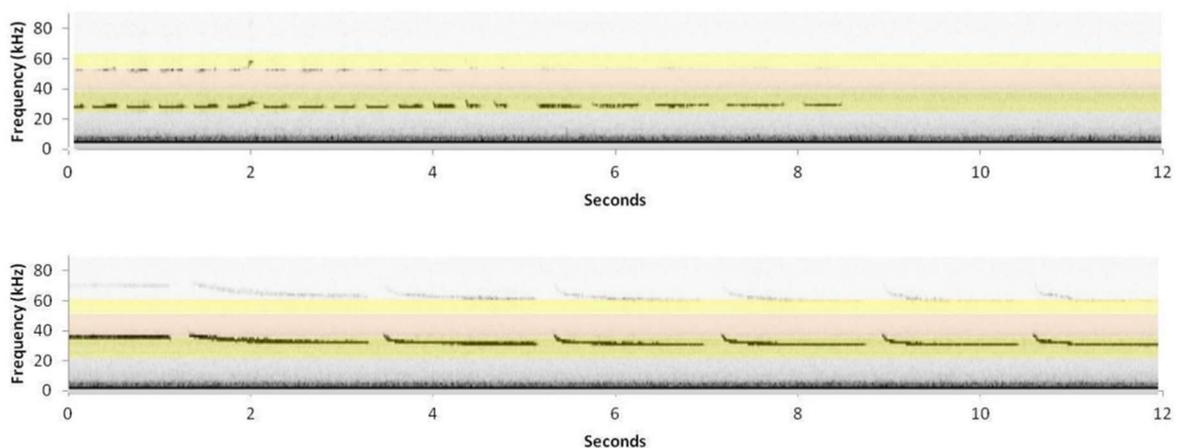
<sup>1</sup> Hamilton city bat survey 2020–2021. p.7. Retrieved from <https://waikatoregion.govt.nz/services/publications/hamilton-city-bat-survey-2021/>

8. There is a doubt about the future of bats in the north of the city, and the results of surveys demonstrate that where there is disruption of connectivity, then even with initiatives like Nature in the City and community-led restoration, the resident population of bats in the city may not be able to return. When considering how best to protect bats, I would like to emphasise that the commissioners look to the evidence provided by DoC, who are all entirely invested in the protection of bats.



Hamilton City Bat Survey: ABM Sites 2021

9. A final point I would like to bring to the commissioners' attention is that the acoustic monitors that were used for the survey (DOC AR4) are also able to pick up rat vocalisations<sup>2</sup>. Although the survey was not targeted at observing rats, the most common sound recording found at all the sites in the surveys was rats. This establishes that rats are ubiquitous within the city, including in the Peacocke area. Therefore, continuous and comprehensive predator control must be undertaken across the whole landscape.



### **An example of the appearance of rodent vocalisations in BatSearch 3.0 (Department of Conservation)**

#### **Vehicle Headlights**

10. I would like to reference previous evidence given by DoC experts in this area, who advocated barriers along roads to obstruct headlights from impacting bat habitats. I would also like to echo the concerns of Andrea Graves who noted Dr Stuart Parson's study<sup>3</sup>. She stated that surveys were only carried out along roadsides where there was established vegetation which could act as a natural barrier, meaning that it is unclear what the effect of headlights will be in other circumstances.
11. I note also that the evidence provided by Dr Kerry Borkin critiqued Dr Parson's study as the monitors were placed along roads where there were few corners, driveways, and intersections.

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<sup>2</sup> Lloyd, 2017. BAT CALL IDENTIFICATION MANUAL FOR DOC'S SPECTRAL BAT DETECTORS, Retrieved from [https://ftp.doc.govt.nz/public/folder/CpR1cRv\\_cE\\_rqb9ua5WRTg/electronics/Acoustic%20Recorders/Bat\\_Call\\_ID\\_Spectral.pdf](https://ftp.doc.govt.nz/public/folder/CpR1cRv_cE_rqb9ua5WRTg/electronics/Acoustic%20Recorders/Bat_Call_ID_Spectral.pdf)

<sup>3</sup> Parsons, S. (2021) AMBERFIELD – PERSISTENCE OF BATS IN THE PRESENCE OF VEHICLE HEADLIGHTS. Report prepared for Weston Lea Ltd.

Given that the Peacocke area is being developed into an urban suburb, I would urge that the commissioners follow the recommendations within evidence provided by DoC experts in this case.

12. During the hearing process, experts and submitters noted that there are uncertainties which remain within Plan Change 5. It is logical to take a more cautious approach where there is uncertainty, which would be to ensure that the recommendations made by DoC experts are prioritised in the context of vehicle headlight barriers and other road and traffic-related recommendations, to ensure that there is as little disruption to bat habitat as possible.

## **Bat Roost Trees**

13. The importance of bat roost trees in the Peacocke area cannot be understated. In a landscape where there is limited habitat remaining for long-tailed bats, it is misleading to suggest that the DoC tree felling protocol is a sufficient measure for ensuring no bats are harmed. It is not designed to be a tool to allow trees to be removed. The protocol itself states that removing trees should be considered a last resort when a tree is potentially used by bats<sup>4</sup>.
14. We also must bear in mind the length of time that it takes for a new tree (planted as compensation) to become a viable bat roost tree. It can take decades for a tree to become useful habitat, and when it does it is not certain that bats will use it.
15. I also object to the use of artificial bat boxes to protect long-tailed bats as evidence suggests their effectiveness is limited, and it is not clear that they provide adequate roosts<sup>5</sup>. In the case of Hamilton, artificial bat boxes are not consistently maintained across the city (predator bands are missing, boxes are damaged, or nearby branches are not removed) which means they are not a safe place for a bat to roost.
16. The most important approach we can take to protect bats is to protect their natural habitat at all costs, as roost trees are in short supply, and the suggestion that bat houses can replace them is flawed.

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<sup>4</sup> Department of Conservation, 2021. Protocols for minimising the risk of felling bat roosts. Version 2: October 2021 approved by the New Zealand Department of Conservation's Bat Recovery Group. Retrieved from <https://ftp.doc.govt.nz/public/folder/J8y-HgKTuEmoYMZtafa6nA/bat-recovery/doc-bat-roost-protocol-v2-oct-2021.pdf>

<sup>5</sup> Department of Conservation, 2022. New Zealand Bat Recovery Group Advice Note – The Use of Artificial Bat Roosts

