BEFORE THE INDEPENDENT HEARING PANEL
APPOINTED BY HAMILTON CITY COUNCIL

IN THE MATTER	of the Resource Management Act 1991 (**Act**)
AND	
IN THE MATTER	of hearing submissions on Plan Change 5 to the Hamilton City District Plan
BETWEEN	**THE ADARE COMPANY LIMITED** **Submitter #53**
AND	**HAMILTON CITY COUNCIL** **Local authority**

EVIDENCE IN CHIEF OF ANDREW BLAYNEY FOR THE ADARE COMPANY LIMITED

ECOLOGY – HABITAT FUNCTION AND DESIGN

16 SEPTEMBER 2022

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SUMMARY OF EVIDENCE

1. My name is Andrew Blayney, and I am a terrestrial ecologist with Boffa Miskell Limited. I am providing evidence in relation to the creation, protection and enhancement of long-tailed bat habitats including the consideration of design, function, and implementation matters for likely success in managing the impacts of development.

2. I summarise my evidence, according to the key headings in this statement as follows:

Long-tailed bat habitats in the PSPA and the impacts of development. *(Page 6)*

(a) The Peacocke Structure Plan Area (**PSPA**) provides a varied suite of preferred long-tailed bat habitats broadly including gully systems, riparian corridors, and clusters/complexes of trees (like shelterbelts).

(b) These habitats provide multiple functional resources within the PSPA including connectivity between habitats, shelter and buffering from environmental (such as wind) and artificial (such as artificial light at night) factors, foraging opportunities/habitat, and roosting habitats.

(c) The proposed land use change within the PSPA from agricultural land use to urban land use has the potential to impact on habitats directly and indirectly within the area. This leads to the potential for both direct loss of habitat and functional loss of habitats.

Bat habitats and corridors, factors of importance in their design and function – retained and created habitats. *(Page 8)*

(d) In the context of the above summary of habitats and the resources they provide to long-tailed bats in the PSPA I have identified several interlinked and complimentary factors of importance to consider when retaining, creating, and enhancing habitats and the resources they provide within the PSPA.

(i) Factors of importance for connectivity including suitable, continuous connections, that are functional from both a habitat structure perspective.

(ii) Factors of importance for sheltering and buffering are the appropriate design and/or retention of larger stature, dense vegetation, controls on the development interface, and sufficient width.

(iii) Foraging and roosting habitats largely result from the appropriate implementation of the above factors, but improvements can be achieved through specific design and management.

(e) Common across all these factors managing for both spatial and temporal lag in the creation and retention of habitats is identified as a key requirement.

(f) In considering these factors I agree with the landscape-scale approach proposed within PC5 for managing effects of development, including the development interface controls, on long-tailed bat habitat.

Factors for likely success in the implementation of a PSPA landscape scale complex of habitats and corridors for long-tailed bats *(Page 15)*

(g) In considering the likely factors for successfully implementation and achieving the retention and creation of the habitats and resources and the important factors of these habitats I identify a major risk in the way the PC5 proposes to achieve the landscape-scale management approach.

(h) PC5 proposes a consent application by consent application approach in triggering actions to manage the effects of development. I consider this would result in a disorganised and piecemeal approach which risks considerable spatial and temporal lag issues in efficacy of the management.

(i) I consider an alternative, cohesive, coordinated, and proactive approach lead by a centralised body such as HCC or a collaboration of stakeholders. In not proposing such a coordinated approach I consider the PC5 provisions, due to their focus on consent applications triggering assessment and management, will not facilitate the effective implementation of the landscape-scale management approach proposed.

INTRODUCTION

1. My name is Andrew Russell Blayney.

2. I am a senior terrestrial ecologist (Principal) at Boffa Miskell Limited (**Boffa Miskell**), in Hamilton. I have held this role since January 2017. Prior to that date I was employed by the Bay of Plenty Regional Council as Subject Matter Expert – Integrated Catchments (February 2016 to December 2016) and Land Management Officer (June 2012 to February 2016). I hold the qualifications of Master of Science – Zoology (1st class Honours), Massey University (2013) and Bachelor of Science - Ecology & Zoology, Massey University (2010). I am also a Certified Environmental Practitioner (Certification # 1278) under the Certified Environmental Practitioner Scheme (CEnvP) of the Environmental Institute of Australia and New Zealand.

3. The below selection of projects provides an indication of my experience which is relevant to this evidence:

   (a) Amberfield Development, Peacocke Structure Plan Area (**PSPA**), Hamilton (2017 to present), project terrestrial ecologist in the consenting of the Amberfield Development. This includes the assessment and management of vegetation, fauna including the surveying for long-tailed bats (*Chalinolobus tuberculatus*) and assessment of potential roost trees and providing ecological evidence in both the council hearing and environment court. Post the consent being granted, I led and authored both the habitat management plan and bat protection plan including their various sub plans. This involved designing both the form, function, and layout of bat habitats and corridors as well as planning and designing the implementation approach to these features.

   (b) Ruakura Inland Port, Hamilton (2017 to present). I am the lead project ecologist in the design, consenting and implementation of multiple stages of the inland port development in the Ruakura Structure Plan area and associated supporting infrastructure. This includes the survey, assessment, and management of fauna, including long-tailed bats, providing ecological input into the development and design of wetlands and lizard habitat for

mitigation, management plans for long-tail bat effects management, and providing technical advice on ecological constraints and opportunities associated with the project.

(c) Takitimu North Link Stage 2, (2020 to present). I am the lead project ecologist for ecological assessments for Stage 2 of the TNL roading project. This included vegetation, fauna (including long-tailed bats), and wetland surveys and assessment. This has involved designing compensation packages for habitat loss. During this work I have also acted as internal project subject matter expert in reviewing management plans for the currently being constructed Stage 1 of the TNL project.

(d) Te Ahu a Turanga Manawatu Tararua Highway (2018 to 2019). I carried out the fauna surveys (including long-tailed bats) and ecological impact assessment for the designation of the new highway to replace SH3 through Manawatu Gorge. I presented evidence on this assessment to a council hearing.

CODE OF CONDUCT

4. I have read the Environment Court Code of Conduct for expert witnesses and agree to comply with it.

5. I confirm that the topics and opinions addressed in this statement are within my area of expertise except where I state that I have relied on the evidence of other persons. I have not omitted to consider materials or facts known to me that might alter or detract from the opinions I have expressed.

SCOPE OF EVIDENCE

6. The scope of this evidence focuses on the creation, protection, and enhancement of long-tailed bat habitats within the PSPA.

7. This includes the design of bat corridors such as design requirements, function, implementation, and matters for ensuring success of the establishment of corridors.

8. My evidence is structured as follows:

(a) Long-tailed bat habitats in the PSPA and the impacts of development.

(b) Bat habitats and corridors, factors of importance in their design and function – retained and created habitats.

(c) Factors for likely success in the implementation of a PSPA landscape scale complex of habitats and corridors for long-tailed bats.

LONG-TAILED BAT HABITATS IN THE PSPA AND THE IMPACTS OF DEVELOPMENT

9. Preferred long-tailed bat habitats within the PSPA are currently varied and broadly include:

(a) Gully systems with different levels of vegetative cover, presence of water, and incision of the landform.

(b) Riparian corridors, including the Waikato River (often associated with the above gully systems).

(c) Clusters and complexes of trees such as shelterbelts.

10. To first consider how habitats may be created, protected, and/or enhanced within the PSPA it is necessary to understand what:

(a) Functional elements of these habitats are important from a bat biology/behavioural perspective; and

(b) Effects of the proposed development such activities are proposed to manage or compensate for.

11. The factors of bat biology, behaviour, and landscape associations that drive the preference for habitats and the resources they provide to long-tailed bats are addressed in Dr Parson's evidence[1]. I do not intend to repeat this information and the following paragraphs focus on habitat

[1] Statement of Evidence of Dr Stuart Parsons on behalf of The Adare Company Limited, dated 16 September 2022.

factors which complement and build from Dr Parson's evidence on the specific preferences and behaviours of long-tailed bats.

12. In the current landscape of the PSPA, the preferred habitats provide long-tailed bats with resources such as:

    (a) Connectivity between habitats – in terms of providing continuous navigable structures, either through topography, vegetation, or both, for commuting between habitats (roosting sites, foraging areas, commuting pathways, etc.).

    (b) Shelter and buffering – from natural environmental factors such as wind which allows more energetically efficient movement routes than open areas. As well as, particularly in the northern and north-western boundaries of the PSPA, buffering from sources of artificial light at night (**ALAN**). In the existing environment, away from these urban boundaries of the PSPA, this buffering may be more of a function of the habitats distance from such light sources as opposed to the structural blocking of light.

    (c) Foraging – habitats provide foraging opportunities for long-tailed bats in many different ways including aggregation of insect prey in sheltered pockets of open areas or canopy and the aggregation of flying insects in the leeward side of clusters of vegetation or linear habitats. As well as production and/or attraction of insect prey resources by providing habitat and food sources for insect prey.

    (d) Roosting resources – generally consisting of larger, older trees with features such as peeling bark, dead limbs, knot holes, splits, and cracks. While these features are typically found in older trees they can also be found in younger, smaller trees. Age or overall size is not a definitive discriminator for these structural features being present in vegetation and natural and/or artificial damage can accelerate the presence of these features. An important factor for these types of habitats, however, is they are relatively stable and undisturbed from vegetation clearance, maintenance, or modification over time which allows roost features to develop and/or be retained in the vegetation present.

13. The land use change in the PSPA from the current predominately agricultural land use into an urban land use has the potential to adversely affect the preferred habitats and the resources they provide. Direct impacts such as clearance and/or change of land cover can physically remove habitat. Indirect effects such as fragmentation and introduction of disturbance such as ALAN which creates obstacles to movement within (and to) individual habitats resulting in functional loss of the habitat.

14. IIn the context of mobile fauna, such as long-tailed bats, the approach of avoiding direct impacts on habitat is not always the same as avoiding the effect itself. Functional loss of the value and resource of the habitats can be lost due to lack of connectivity, or barriers to the use of the habitats such as ALAN spill into the habitats causing avoidance. That is to say, both direct and indirect effects need to be managed to avoid physically or functionally losing habitat.

15. The potential effects of development must also be considered for not just existing and retained habitat features but the impacts of the indirect effects on created habitats such as corridors.

BAT HABITATS AND CORRIDORS, FACTORS OF IMPORTANCE IN THEIR DESIGN AND FUNCTION – RETAINED AND CREATED HABITATS

16. Considering the factors discussed above the protection, enhancement and creation of bat habitats, including corridors, outside of the proposed residential development footprint needs to focus on managing the indirect effects of development and as well as creating and protecting those resources preferred habitats provide to long-tailed bats.

17. In this context it is worth noting that most of the resources provided by habitats are structural in nature and related directly to the physical form of the habitats rather than their diversity or health from a native vegetation/indigenous habitat perspective. As such, what might be considered a typical approach to the restoration of habitats needs to be adapted. A typical approach that focuses on vegetation composition and attempting to restore and replicate vegetation communities that may have existed at the location in the past should be adapted to put more focus on the structural elements provided by the habitats being created. This can mean a greater emphasis on the retention of non-native vegetation and

the use of fast-growing exotic trees, which also age quickly and provide roosting features earlier than many native species. Mr Kessels provides a valuable outline of this concept and the need for unique approaches required in novel urban ecosystems in his statement of evidence.[2]

18. I agree with Mr Kessels that "*ecologists do not completely understand how long-tailed bats are able to persist in highly modified and largely exotic landscapes of southern Hamilton*". However, in consideration of the above summaries of habitat preferences, resources provided by preferred habitats and the structural importance of these habitats, the important factors for creating long-tailed bat habitats and protecting the function of retained habitats are able be resolved. I have provided a summary of these factors below. These factors are interlinked and should be considered as a package of complimentary requirements rather than factors of individual relevance.

    (a) Connectivity of habitats, which requires:

        (i) Habitats to be connected to one another through suitable connections, and connections should be efficient (i.e. take short direct or otherwise energy efficient routes between habitats).

        (ii) Continuity as in there should be minimal obstacles to the movement of long-tailed bats between habitats. Obstacles can include gaps in corridors, areas of disturbance and subsequent avoidance such as lit sections of corridors.

        (iii) The above two factors share a key requirement in the context of retention and creation of habitats. To reach the point in which created habitats are functional and retained habitats are able to retain their functional value there must be a connected network of habitats that are individually functional (i.e. vegetation established sufficiently that it provides the structural resources required). That is, staging from both a spatial and time scale is important. The implication of this

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[2] Statement of Evidence of Mr Gerardus Henricus Anthonius Kessels on behalf of Hamilton City Council, dated 02 September 2022, at [31-33].

requirement is that for created corridors, a fragmented trigger for creation, such as the consent application of a property which contains within it a proposed corridor, will provide for habitats of little value until the complete corridor has been secured and enhanced. Therefore, connectivity is a key factor for success as isolated, well designed or high value retained habitats, are of little to no functional value until connectivity is able to be retained or established.

(iv) The spatial lag and time lag issues also need to be considered in the context of a potential behavioural lag in long-tailed bats beginning to use novel habitats. There is little certainty in how long this behavioural lag may be and any conclusion or insight can only be gained from the observations of the patterns of use observed in modified landscapes and the general observation of persistence in modified landscapes. Around the PSPA area we can observe bats utilising artificial roost boxes in Sandford Park, which was clear of vegetation in the late 1970s. There are also high levels of bat activity along the east-west shelterbelt on the Amberfield site, which consists of a mixture of mature but not particularly old alder and *Casuarina* trees. We can also observe long-tailed bats living in and near plantation forestry which undergoes periodic felling. These observations suggest adaptation and behavioural plasticity overtime to changing landscapes, however the time scale of this adaptation is still somewhat uncertain.

(b) Sheltering and buffering, which requires:

(i) Design and/or retention of habitats to include plantings or retention of larger stature vegetation which provides sheltering from wind and also buffering from external disturbance. The typical approach in this context would be to include tall and dense vegetation on the edge of any created or retained long-tailed bat habitat to provide this buffering role, habitats with the habitat are then able to be more diverse in

both height and density due to the buffering from the edge of this vegetation.

(ii) Controls on the development interface of the habitats to ensure lighting is not able to enter the habitats. This, like that proposed in the PC5 plan change can be achieved primarily through the implementation of lighting controls for fixed lighting. However, headlights from vehicles are a more difficult issue to manage and I consider from a habitat perspective that the design of roads, their location, and specific design and planting interventions where headlight spill could occur are likely to be the most effective mechanism for manging for this effect. This approach does require an acknowledgement that the outer edges of the habitats have a function as light buffers rather than all management of potential lighting impacts being achieved prior to the habitat boundary. It is therefore important, as discussed below, that the structural elements of the habitat are appropriate to this function and are tall and dense enough to effectively block light where this is necessary.

(iii) Vegetation to be established to provide the structural resources that allow commuting, wind buffering, and buffering from the development interface (see (a)(iii) above in relation to related and relevant spatial and time lag issues).

(iv) Sufficient width of habitats to provide flight corridors, foraging opportunities, and stable roosting habitats within the habitat (the importance of each characteristic will be somewhat variable between locations such as corridors and core habitats), away from the development interface.

(v) Composition and complexity of habitats. Habitats need to be varied and complex to provide the full suite of microhabitats which provide the resources used by bats. This includes tall stature mature vegetation areas of open and shrub/scrub habitat, and waterways (including wetlands and ponds). Vegetation edges in the interior of the long-tailed bat habitats,

away from the development interface, also need to be retained and created. This can be achieved by ensuring structural elements such as linear corridors and more open spaces which create these edges are included in design of the complex habitats. Structuring habitat in such a way provides for multiple options for bat movement within habitats providing them with choices for movement in response to environmental factors such as wind (i.e., allowing them to move along the leeward side of features in different wind conditions) away from the urban areas.

(c) Foraging resources:

(i) Foraging habitats are largely a result of the provision of connectivity and appropriately protected, structurally diverse habitats that provide for areas of insect prey aggregation and areas for foraging.

(ii) Within these habitats, design elements can be included to enhance the foraging opportunities such as ensuring the composition of any planting includes insect host plants or food plants for nocturnal flying insects. This can also be achieved by varying the management of spaces from standard methods to improve insect abundance. A major potential for increasing insect resources are open spaces of grass which are typically mown if present in reserves. If mowing is less frequent and/or in patterns which leave longer areas of grass, considerable increases in insect abundance are able to be achieved[3].

(d) Roosting:

(i) Like foraging, roosting resources are largely a result of appropriate structure, function and design of vegetation with maintenance aligned with the factors discussed above for

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[3] Garbuzov, M., Fensome, K. A., & Ratnieks, F. L. (2015). Public approval plus more wildlife: twin benefits of reduced mowing of amenity grass in a suburban public park in Saltdean, UK. Insect Conservation and Diversity, 8(2), 107-119.

connectivity, sheltering and buffering. However, they have specific constraints to their creation and retention.

(ii) Roosting resources are difficult to create quickly as they result from the aging and damage of trees. An attempt to create natural roosting resources can have a considerable time lag. Therefore, roosting resources will need to be created in advance of the loss of roosting habitat and/or roosting resources will need to managed in alternate ways to address the lag time between impact and efficacy.

(iii) Planting for the purpose of creating roosting features should consider using non-native species, including from the genera *Populus* (poplars), *Quercus* (Oaks), *Acacia* (wattles), *Salix* (willows), and *Robina* (locust). Such species can be included in plantings and retention strategies to ensure the faster creation of roost habitat. This inclusion of non-native species does need to be considered carefully in context of the invasive potential of many species within these genera.

(iv) The retention of roosting features also requires a somewhat novel approach to reserve management where trees that are aging, and potentially hazardous to reserve users (due to trees and branches falling down) are actively retained and uses and activities in these areas respond to this need.

19. Within the context of the factors I have identified as important for the creation and retention of long-tailed bat habitats, I consider that the approach proposed for bat habitat retention and creation at a landscape scale within PC5 is the most appropriate approach to managing the effects of the urban development proposed. In this matter I agree with and support the Council ecological experts and technical reports which outline this approach.

20. I agree with and support the conclusions of the Council ecological experts and technical reports on the proposed development interface controls. I consider that management of fixed lighting to 0.3 lux and building setbacks, which are consistent with the Amberfield decision, are appropriate to managing the potential disturbance of ALAN into the

SBHAs. I acknowledge, as above, that managing the impact of headlights on habitats, is a more difficult issue and needs specific buffering (both within transport corridors and habitats in response) and design of the transport corridors. In this respect I consider the assessment criteria P3 I)[4] important to ensure appropriate management.

21. I consider that the width of the proposed SBHA corridors of 50m is appropriate as that width provides sufficient space and flexibility to include structurally complex and diverse habitats, which will provide the sheltering and buffering functions as summarised above. This width also allows the incorporation of buffer planting where it might be required in close proximity to roads that may not be otherwise avoided (such as the areas around transport corridor crossing points through SBHAs) while still being able to retain flight paths in the protected core of habitats.

22. I agree that the habitats retained and created can be subject to multi-functional use where these uses are not in conflict with the resources and function provided for long-tailed bats. Uses like recreation, such as walking and cycling, and utilities where artificial lighting at night is not proposed[5] can occur within these habitats without impacting the function of them for bats.

23. The installation of the infrastructure to support these uses may conflict with the purpose of these areas as providing bat habitat where it requires vegetation removal or other habitat impacts. There is also the potential for an additional indirect effect on such habitats – the very characteristics that provide high quality roosts, which often exist in unhealthy / aging trees, are also the characteristics that pose risks to public safety and utilities. This increases the risk that a tree will be removed to protect the public or infrastructure. In this respect, I consider it is important to identify the priorities and important characteristics of habitats created and/or retained and appropriately manage the use of these areas with these potential

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4 Appendix 1 – District Plan Administration – Section 1.3.3 Restricted Discretionary, Discretionary and Non-Complying Assessment Criteria - P3 Development in Peacocke Precinct

5 Excepting possible emergency lighting associated with utilities in the event of urgent maintenance or emergency.

future issues in mind. This may include identifying areas that are specifically excluded from co-location of recreational and utility usage.

FACTORS FOR LIKELY SUCCESS IN THE IMPLEMENTATION OF A PSPA LANDSCAPE SCALE COMPLEX OF HABITATS AND CORRIDORS FOR LONG-TAILED BATS

24. Within this section I do not intend to rehash the “on the ground”, design, or retention factors that would make the creation and protection of habitats at a local and PSPA scale effective. I consider the above section covers these factors. This section focuses on matters that are requisite for the likely success a landscape level approach to habitat protection and creation. These matters are informed directly by the factors of importance for habitat creation and maintenance that I discuss above.

25. The primary matter to be addressed through the implementation of the landscape wide scale concept for effect management is the management of spatial and temporal lags which are identified as a primary consideration of importance for all matters summarised in the above section.

26. I consider that there is major risk in the way that PC5 requires the enhancement of SBHAs through a consent application by consent application approach, typical of effects management in an RMA context. I consider this will lead to significant temporal and spatial lags in forming connectivity and efficacy of restored and retained habitats. In this scenario, there is potential for corridors and habitats to be created with large gaps between them (spatially and temporally), with little certainly as to when these corridors will be complete. As noted above, punctuated clusters of high-quality habitats are of little use to long-tailed bats without connectivity.

27. What is needed is a framework that provides for a cohesive, coordinated, and proactive approach to managing the retention and creation of long-tailed bat habitat across the entirety of the PSPA. A consent application by consent application approach cannot achieve the coordination and proactivity required. A more strategically planned approach is required that focuses on landscape level effects management including what is planned for spatial areas as well as how the process and timing of

development (including habitat retention and creation) across the PSPA and city-wide landscape is managed.

28. An obvious way to achieve an effective landscape level approach would be for it to be proactively coordinated by HCC and/or a collaboration of partners such as Waikato Regional Council, Department of Conservation, iwi, and community groups. I consider this coordinated approach could be guided by the proposed City-wide Bat and Habitat Enhancement Panel (or equivalent).

29. With this approach, there would be a need for a mechanism to equitably assign cost (or reimbursement / purchase of property in some circumstance) and capture funding to carry out the proposed landscape level approach. There would also be a need for site-scale management to minimise adverse effects such as managing the interface with retained and created habitats and managing the process of urbanisation within individual sites such as managing the process for vegetation clearance (i.e. following tree fell protocols).

30. If this approach were adopted, I consider that there would not be a need for individual consent by consent application assessments of effects or detailed management plans (beyond managing those matters described above). The reason for this is that individual assessment of smaller scales than the landscape level approach is likely to only show fragmented, relatively limited envelopes of effect, missing the cumulative and landscape level change that will occur. Therefore, the outcomes of such assessments are only likely to subvert the purpose of the landscape level approach.

31. I consider that emphasis and support for the landscape level approach is consistent with the Council technical experts and the Technical Ecology Report attached to Mr Kessels evidence, which states in relation to the PC5 provisions "*… They provide a landscape-scale approach to safeguarding the ecological values, habitats and biodiversity in a currently*

rural landscape with unusually high ecological values, whilst enabling development required to cater for a growing population…."[6]

32. However, in my opinion, the PC5 provisions, due to their focus on consent applications, triggering assessment, and management requirements will not allow the effective implementation of the proposed landscape scale approach. I consider that a cohesive, coordinated and pro-active approach, led and delivered by a centralised overarching body is necessary for the likely success of PC5 in safeguarding ecological values while enabling the development required to cater for a growing population.

CONCLUSION

33. In considering the types of long-tailed bat habitats within the PSPA, the resources they provide to long-tailed bats, how development might impact these habitats and resources, and the important factors to consider when retaining, creating, and enhancing these habitats to manage for these effects. I agree with the proposed landscape scale effects management approach to management of effects related to the effects of the development within the PSPA.

34. However, I consider there is a major risk related to how this approach is to be implemented due to the potential for the consent application by consent application assessment and implementation triggers. I consider this would result in a disorganised and piecemeal approach which risks considerable spatial and temporal lag issues in efficacy of the management

35. I consider an alternative, novel approach, of a cohesive, coordinated, and proactive approach lead by a centralised body such as HCC or a collaboration of stakeholders is necessary to effectively implement the landscape scale effect management proposal. In not proposing such a coordinated approach I consider the PC5 provisions, due to their focus on consent applications triggering assessment and management, will not

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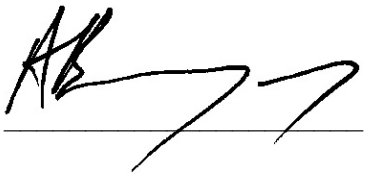
6 Page 5 of the Technical Ecological Report attached to the Statement of Evidence of Mr Gerardus Henricus Anthonius Kessels on behalf of Hamilton City Council, dated 02 September 2022.

facilitate the effective implementation of the landscape-scale management approach proposed.

Dated this 16th of September 2022



Andrew Blayney