

Submission on the Application made by Weston Lea Limited for subdivision and land use consents for the Amberfield Development.

Go Eco is the largest community based environmental and sustainability hub in the Waikato. Approximately 16000 people have engaged directly with our Environment Centre and Hub on Biodiversity, Conservation, Climate and Sustainability topics over the past year. Our vision for Healthy Environments supported by Thriving Communities is supported by a diverse and extensive range of communities in Kirikiriroa-Hamilton and across the region.

Biodiversity and Conservation is one of our work-streams and Project Echo sits within this stream for our organisation. Since 2014 Go Eco has provided administrative and organising support for this project. The City, Region and Department of Conservation contributed funding to the monitoring project as a result of this community based collaboration. The data collected by Project Echo has informed the expert witnesses who have presented during the course of this hearing.

We congratulate Hamilton City Council, Waikato Regional Council & the Department of Conservation for joining with Kiriikiroroa based communities committed to preserving and increasing our indigenous biodiversity. That initial funding has contributed to an increased understanding and community awareness of a key taonga which underpins our local indigenous biodiversity - the Pekapeka. However, this taonga now has a conservation threat status of “nationally critical”¹ and a 70% decline over the next three generations is predicted.

There is clearly more work to be done. If we protect bats, many other species and our ecology will flourish. Today we have heard the announcement of the government's direction in terms of climate change mitigation. Amberfield can, through the protection and planting of forest in particular, contribute significantly to climate change mitigation. Through this development we also have the opportunity to make a strong contribution to the 20% indigenous biodiversity goal currently being discussed as part of Hamilton's Local Indigenous Biodiversity Strategy.

We endorse and fully support the Statement of Evidence provided by Dr Rebecca Liv Stirnemann, Dr Bruce Clarkson and the accompanying submission of Riverlea Environmental Society Inc. Our own submission seeks to highlight the evidence, data and science provided by these and other submitters. These submitters all highlight the

¹ C.F.J. O'Donnell, K.M. Borkin, J.E. Christie, B. Lloyd, S. Parsons and R.A. Hitchmough. (2017) Conservation status of New Zealand bats, 2017. New Zealand Threat Classification Series 21. 4 p.



catastrophic risk to our pekapeka population if Amberfield goes ahead without change. The applicant, Weston Lea Ltd, needs to go beyond the mitigation plan and rethink the development so to prioritise indigenous biodiversity over a system of development that has failed our environment for decades. This failure is evidenced not only in our own national reports that indicate 4000 of our native plants and animals are at risk of extinction² but also in the latest international report that demonstrates that more than 1 million species worldwide are threatened with extinction by humans, many within decades³.

The Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services Global Assessment Report is the most comprehensive ever completed. The report concludes that the current global response is insufficient and that transformative changes (a fundamental, system-wide reorganization across technological, economic and social factors, including paradigms, goals and values) are needed to restore and protect nature. Despite progress to conserve nature and implement policies, the report suggests that global goals for conserving and sustainably using nature and achieving sustainability cannot be met by current trajectories. Current negative trends in biodiversity and ecosystems will undermine progress towards 80% (35 out of 44) of the assessed targets of the Sustainable Development Goals, related to poverty, hunger, health, water, cities, climate, oceans and land (SDGs 1, 2, 3, 6, 11, 13, 14 and 15). Loss of biodiversity is therefore shown to be not only an environmental issue, but also a developmental, economic, security, social and moral issue as well.

The report advocates nature-based solutions, including the increased use of green infrastructure and other ecosystem-based approaches. These approaches can help to advance sustainable urban development while reinforcing climate mitigation and adaptation. The report recommends that urban key biodiversity areas should be safeguarded and advocates urban planning approaches to promote sustainability include encouraging compact communities. If section lots in Amberfield need to be reduced to protect biodiversity then more compact development may be required. The report states that opposition from vested interests can be overcome for the public good. That is what we hope this hearing will achieve.

With the impacts of climate change, we are in particularly vulnerable times. Current research undertaken by the Department of Conservation seeks to better understand the sensitivity and risk of native biodiversity to climate change, including the effects on the breeding of

² [*New Zealand's Sixth National Report to the United Nations Convention on Biological Diversity*](#)

³ <https://www.ipbes.net/news/Media-Release-Global-Assessment>



hibernating species including long-tailed bats. While we may know some of what is required to protect the bat, we do not know the real extent of their vulnerability going forward and so we urge the commissioners to come down solidly on the side of caution and the greater likelihood of guaranteed protection of the pekapeka and our ecosystem as whole. Why would we continue to risk ongoing grave ecological collapse?

The pekapeka or long tailed bat is very unique to Hamilton, and as such provides significant environmental and economic opportunity for the region. Go Eco has been contracted to provide bat tours and education during 2019. The bat tours have been operating for a number of years. Approximately 10 tours are held per year. The tours are in high demand and are always booked out. We can confirm a significant local community interest in understanding, identifying and protecting the pekapeka population once it's understood they exist. We are looking ahead to the tourism potential and further development of these tours alongside the wider connection to the Waikato Awa. With funding sought to extend the research and monitoring project to Cambridge and employ a Project Coordinator we are advocating for an outcome that upholds authentic sustainable development and absolute protection of our indigenous biodiversity through redesign of the Amberfield Project. Hamilton City recently released a video on social media which claims Peacocks development of which (Amberfield is one cell) as our city's most significant growth strategy - 30 years in the making.

We want you to develop and overlay a growth strategy for our indigenous biodiversity and supporting ecosystems. Globally we are facing a catastrophic decline in flora and fauna diversity and locally we continue to plod on thinking that offering mitigation is amends for the devastation of a species.

Our vision statement "Healthy Environments supported by Thriving Communities" gives an overview of the depth and breadth of our mission to be a voice for the environment, a centre for learning and a catalyst for change.

As Jo noted, Go Eco is a significant contributor to Project Echo. Project Echo is a multi-agency initiative to raise people's awareness of long-tailed bats in Hamilton and surrounding rural fringes. The project partners are Go Eco, The Waikato Regional Council, Hamilton City Council, Riverlea Environment Society, The University of Waikato, and the Department of Conservation. Work includes gathering information on distribution, identifying roosting sites and raising awareness of the species' needs and threats. The project's objectives are:

Education - through bat tours, open days, public talks



Calculation - researching numbers and distribution

Habitat - protection and enhancement of bat habitat, and predator control

Oversight - collaboration, planning, advocacy, politics

Hamilton is one of only a few cities in New Zealand with a resident population of long-tailed bats. The long-tailed bat is unique to New Zealand and, together with the short-tailed bat, is New Zealand's only remaining native land mammal. Long-tailed bats can be found throughout New Zealand in varying habitats. However, their numbers are declining due to removal of roosting trees, predation by animal pests, and increasing competition for roost sites from rats and possums. In the past, bats used large, old canopy trees (rimu, kahikatea, totara, pukatea) to roost in, either beneath the bark or in cavities. With the clearing of native forest and subsequent loss of natural habitat, bats have had to find other roosts in old exotic trees. Long-tailed bats have been detected roosting in pine, eucalyptus and oak trees in and around Hamilton.

Project Echo has some tips for protecting bats that we also recommend to the applicant 1. Check before you chop - Dead or old trees with hollows and cavities are long-tailed bats' natural habitat. You can help them by protecting standing dead trees and old trees with cavities. 2. Plant for the future - Plant large trees for future bat generations. 3. Control pests - Pests like rats, possums and cats predate on bats and can compete with them for habitat. Control pests at your place to protect bats (as well as birds, lizards and other native fauna). 4. Advocacy - Hamilton's bat population is under increasing threat from development, such as residential subdivisions, roading and industrial parks. It is important that bats are advocated for through policy, planning and resource consent processes. And so here we are!

An additional piece of work that Project Echo is undertaking is to talk with local Kaumātua and Kuia who may know the whakapapa of the pekapeka. Bats were revered as nocturnal ancestral spirits of the forest. This is work that is central to Te Tiriti o Waitangi. At the very heart of Te Tiriti o Waitangi, Article 2, the chiefs were confirmed and guaranteed the exercise of the chieftainship, or *tinio rangatiratanga* over their lands, villages, and 'taonga katoa' — all treasured things. The crown also stated in Te Tiriti that there was to be exclusive and undisturbed possession of these treasures.

From the Wai 262 claim we can read that protecting taonga species and mātauranga Māori is understood to be important to the survival of Māori culture itself. The claim states that without Kaitiakitanga, Māori are themselves lost.



We appreciate the good work that has been done by the Tangata Whenua Working Group and we are pleased to see the plans for the cultural reserve. One of our Project Echo members has been involved in significant work regarding the matauranga māori aspects of the pekapeka. We think this information may be relevant to this process and we hope to share this soon.

We agree with RESI that there is a lack of detail provided by the applicant regarding restoration plans such as the river buffer width and lighting design. Without this detail, you as commissioners cannot adequately assess the application. From our perspective, there seems to be a lack of surety going forward that any of the required restoration work will be undertaken. We would like to see more detail on how Kaitiakitanga, and the role of Mana Whenua as Kaitiaki, will be supported and enabled.

Ko Aotearoa Tēnei recommends reform of laws, policies or practices including indigenous flora and fauna, resource management and conservation. These recommendations include law changes and the establishment of new partnership bodies in several of these areas. These recommendations are in line with the international report that Jo referred - new governance models are recommended. Too often the process seem to invoke a "them and us" mentality - the developer versus the community for example.

We understand that Bruce Clarkson has advocated for a collaborative workshop to redesign Amberfield so that Biodiversity is enhanced and protected. Collaborative processes are certainly required if we are to turn ecological collapse around.

Bats are engaging and to be valued - they bring in passionate people who are willing to volunteer their time. Many in our community are relatively disengaged in political and democratic processes. Go Eco and Project Echo encourage advocacy for bats. And so we have asked one of our volunteers to join us today to relay her experience with volunteering with Project Echo as a signal to the future of a development that engages the community in vital and urgent environmental protection.

My name is Hannah Robinson and I'm a second year biodiversity and ecology student at the University of Waikato. A love for the environment and the animals that occupy it have been the backbone of many of my decisions, so when the opportunity arose to volunteer for the bats of Hamilton I jumped at the chance.

Volunteering with Project Echo involved being split into 4 teams and given locations throughout Hamilton to deploy bat monitors. Every 2 weeks or so, 3 monitors would be hung in trees in the selected locations, it often involved walking off the track to find a good tree



that was out of sight but still in an open area with tree corridors or close to rivers. Once we found a good spot all we had to note down were our location coordinates, easily found on google maps and how far away we were from lights and roads. It was a very simple task and although it doesn't seem like a lot, small simple tasks can have a huge impact for organisations such as Project Echo and this is one of the main reasons I volunteer.

Unfortunately people willing to volunteer their time are hard to find, we all lead busy lifestyles and with rising costs such as rent, food, gas, clothing and basic necessities; thanking someone for their time doesn't cut it. So volunteer numbers drop and the organisations that need them suffer.

For things to change and improve, we need the community, we need people who are willing to work to improve the environment. And Amberfield could be the key, reassess the development to include the needs of the bats and their habitat, get the community involved through employment and attract schools to the area so they can teach our kids the importance of conservation.

It is important that we assess the bigger picture, ecosystems, wild populations of animals and plants are shrinking, deteriorating or vanishing. Why add to the problem when you can help improve it? The actions we take now will cause a domino effect, will you be able to say that you did your best to help the environment not impede it; that you did your best to create an area that did the least harm to our native species of bat; that you went back to the drawing board and you found a better way?

You have a chance to do better, to set an example for the rest of the country. Development in New Zealand can still occur whilst protecting our native species and their homes. Now is the time to consider the needs of the environment before our own.

Ngaa mihi,

Jo Wrigley, Manager, Go Eco

Anna Casey-Cox, Community Liaison, Go Eco

Hannah Robinson, Project Echo volunteer

