

From: [Elvisa van der Leden](#)
To: [Policy Shared](#)
Subject: External Sender: F&B Plan Change 37 Submission
Date: Tuesday, 28 April 2026 3:42:46 pm
Attachments: [Outlook-e5whjdx1](#)
[FB_PC37 - Submission Form 5.pdf](#)
[ForestBird_Waipapc37_Submission.pdf](#)

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Kia ora

Please see attached Forest & Bird's submission form and submission document on the Waipa DP Plan Change 37.

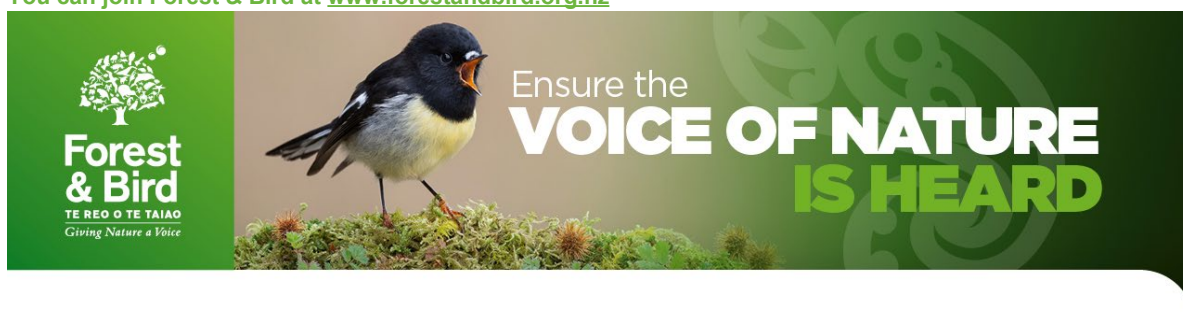
Thank you.

Nga mihi,

Elvisa van der Leden (el-vee-sah) she/her
Regional Conservation Manager – Taranaki & Waikato
Forest & Bird

H 9:00am - 4:30pm, Mon / Tue / Wed / Fri

You can join Forest & Bird at www.forestandbird.org.nz



Send to: Waipā District Council, Private Bag 2402, Te Awamutu 3840

Phone: 0800 924 723 | Online: www.waipadc.govt.nz/planchanges | Email: districtplan@waipadc.govt.nz

Please attach additional sheets if there is not enough space for your submissions. If you do not wish to use this form, please ensure that the same information required by this form is covered in your submission.

Note: You must fill in **ALL** sections of this form.
Submissions close **5pm Tuesday, April 28, 2026.**

COUNCIL USE ONLY

Date received

Document ref:

1. Submitter details

Full name of submitter:	
Contact name if different from above:	
Contact phone number(s)	
Email address:	
Address for service: (required if no email address is provided)	

We will serve all formal documents electronically via the email address provided above. Where there is no email address provided the documents will be posted to the above address.

2. This is a submission on the following proposed plan change to the Waipā District Plan

Proposed Private Plan Change 37 – Rider Park Structure Plan Area

3. Trade competition

Select one	☐	I could	gain an advantage in trade competition through this submission.
	☐	I could not	
Select one	☐	I am	directly affected by an effect of the subject matter that – (a) adversely affects the environment; and (b) does not relate to trade competition or the effects of trade competition
	☐	I am not	

4. Attendance at Council hearing

Select one	☐	I do	wish to be heard (attend and speak at the Council hearing) in support of my submission
	☐	I do not	
If others make a similar submission, I will consider presenting a joint case with them at the hearing.			☐ Yes ☐ No

5. The specific provisions of the plan change my submission relates to are: (give details)

Select one	☐	I SUPPORT	
	☐	I SUPPORT IN PART	
	☐	I OPPOSE	

6. My submission is: (please include the reasons for your view)

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7. I seek the following decision/s from Council: (give precise details – e.g. what you would like the wording of a specific provision (or map) to be changed to)

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8. Signature of submitter (note: a signature is not required if you make your submission by electronic means, however please type your name below)

Signature of submitter: (or person authorised to sign on behalf of submitter)	Dated
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Note to person making submission

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by [clause 6\(4\)](#) of Part 1 of Schedule 1 of the Resource Management Act 1991.

Please note that your submission (or part of your submission) may be struck out if the consent authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):

- It is frivolous or vexatious;
- It discloses no reasonable or relevant case;
- It would be an abuse of the hearing process to allow the submission (or the part) to be taken further;
- It contains offensive language;
- It is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

Personal Information

The information requested on this form, including your contact details, is required by the Resource Management Act 1991. The information will be held by the Council, and you may ask to check and correct any personal information that we hold about you.

Your submission, including your name and contact details, will be made available for inspection at all Council service centres and libraries in accordance with the requirements of the Act. It may also be made available on the Council's website. A document summarising all submissions, including names and contact details of submitters will be posted on the Council's website

If you believe there are compelling reasons why your contact details should be kept confidential please contact the processing planner for this application.

SUBMISSION ON PROPOSED PRIVATE PLAN CHANGE 37

Rider Park Structure Plan – Waipā District Plan

Submitter Details

Name: Royal Forest and Bird Protection Society of New Zealand Incorporated
(Forest & Bird)
Contact: Elvisa van der Leden
Waikato & Taranaki Regional Conservation Manager
[REDACTED]

1. Introduction and Position

- 1.1. Forest & Bird is New Zealand's largest independent conservation organisation and has been Aotearoa New Zealand's independent voice for nature since 1923. Forest & Bird's constitutional purpose is:

To take all reasonable steps within the power of the Society for the preservation and protection of the indigenous flora and fauna and the natural features of New Zealand.

- 1.2. This submission is on Proposed Private Plan Change 37 (PC37) – the Rider Park Structure Plan – which proposes to rezone approximately 98 hectares of land on the southeastern side of Leamington, Cambridge, from Rural and Deferred Residential to Medium Density Residential.
- 1.3. Forest & Bird's main concern with the Plan Change is the potential habitat fragmentation from land development, including associated natural behavioural changes of taonga species such as pekapeka-tou-roa (long-tailed bat).
- 1.4. Forest & Bird conditionally supports PC37, subject to the full adoption and required implementation of the effects management recommendations set out in the Ecological Impact Assessment (EIA) prepared by Tītōki Landcare (Appendix 5 of the application). We consider the Tītōki Landcare EIA to be a credible and well-informed piece of work. Our concern is not with the quality of the EIA or its recommendations – it is with ensuring those recommendations are given full effect through enforceable plan provisions and consent conditions, and that actions and outcomes are delivered on the ground.

2. Biodiversity Values – Pekapeka and Ecological Context

- 2.1. Pekapeka-tou-roa (long-tailed bat, *Chalinolobus tuberculatus*) is one of New Zealand's only two surviving native land mammal species and is classified as Nationally Threatened (Endangered). As a threatened species their habitat is considered significant in terms of s6(c) of the RMA under the assessment criteria of the National Policy Statement on Indigenous biodiversity. The Cambridge and Leamington area is known to support long-tailed bat populations that forage across the rural-urban fringe and use mature trees, hedgerows, shelterbelts, and riparian margins for roosting and movement. The Tītōki Landcare EIA confirms

that bats are present in and adjacent to the PC37 land, and that the proposed development will have effects on these populations that must be actively managed.

- 2.2. Forest & Bird acknowledges that the Waipā District and developers have shown a genuine willingness to accommodate bat conservation needs in recent years. The outcome of the Airport Business Zone plan change, where additional bat protection land was secured through a constructive process, is an example of what improvements can be achieved when ecological expertise is taken seriously.

3. Ensuring Recommendations are implemented

- 3.1. The Tītoki Landcare EIA identifies a range of measures to avoid, remedy, or mitigate the effects of the residential development proposed through PC37 on bat habitat and other biodiversity values. Forest & Bird submits that these recommendations must be given effect through the plan change itself – through plan provisions, inclusion of detail on the Structure Plan, zone rules, and any assessment matters to guide future consent conditions.
- 3.2. In particular, Forest & Bird supports and seeks directive plan provisions that give effect to the following categories of recommendation from the Tītoki Landcare EIA, this includes:

Bat Habitat Management

- 3.3. Requirements for a bat management plan or bat habitat enhancement plan as recommended by Tītoki Landcare to be included as a condition of any subdivision or development consent under PC37 – not merely triggered when a threshold of activity is reached. The content and requirements of a bat management plan should address the Tītoki Landcare recommendations and should be approved by, or in consultation with, the Department of Conservation. Roost trees identified during ecological surveys must be permanently protected through plan overlays and consent conditions, and removal should require a resource consent to ensure a demonstrated absence of roosting bats at the time of removal and appropriate replacement planting.

Lighting Management

- 3.4. Pekapeka-tou-roa are light-averse and avoid artificially lit areas when foraging, which can significantly reduce the functional value of retained habitat near development. Tītoki Landcare EIA recommends lighting controls – including low-intensity, downward-directed lighting and the maintenance of dark corridors connecting foraging and roosting areas – Forest & Bird supports those recommendations being incorporated as requirements within rules for the Rider Park Structure Plan and the associated Medium Density Residential Zone provisions.

Ecological Corridors and Restoration Planting

- 3.5. Long-tailed bats are highly mobile but rely on landscape connectivity between foraging and roosting areas. The recommendations from Tītoki Landcare relating to the retention and enhancement of riparian margins, the planting of native species to create bat foraging corridors, and the establishment of buffer planting between the development and adjacent natural areas should be adopted as

enforceable requirements of the Structure Plan. Forest & Bird supports generous ecological setbacks from waterways and encourages the planting palette recommended by Tītoki Landcare to be used to maximise the foraging value of retained and restored areas.

Pest Control

- 3.6. Predator and pest management is a critical component of long-term bat population viability. Where Tītoki Landcare has recommended ongoing pest control within and adjacent to bat habitat areas, Forest & Bird supports those requirements being built into any Bat Management Plan as a long-term, obligation to be funded by the developer. Community-led predator control programmes such as Predator Free Cambridge represent valuable partnerships that should be supported and connected to the outcomes of PC37 development. Cat controls and regulations must be included in these efforts due to cats being a major predator to bats.

4. Consistency with National Policy Directions

- 4.1. Forest & Bird notes that the National Policy Statement for Indigenous Biodiversity 2023 (NPSIB) sets out direction on the management of adverse effects in relation to indigenous biodiversity and local authorities have an obligation to give effect to the objective and policies.¹ Full implementation of the Tītoki Landcare EIA recommendations – including habitat enhancement, pest control, lighting management, and the protection of roost trees and corridors – is, in our view, the minimum required to satisfy these obligations in the context of PC37.
- 4.2. Forest & Bird asks the hearings panel to be satisfied that the recommended measures, once adopted, will genuinely achieve no net loss – and to require the applicant to demonstrate this through a clear biodiversity outcomes framework before the plan change is confirmed.

5. Relief Sought

- 5.1. Forest & Bird seeks the following relief:
 - a. That PC37 be approved only on the condition that all effects management recommendations contained in the Tītoki Landcare Ecological Impact Assessment (Appendix 5) are adopted as requirements through plan provisions, structure plan rules, and/or consent conditions.
 - b. That the Bat Management Plan recommended by Tītoki Landcare be required as a condition precedent to any subdivision or development activity, and that it be approved in consultation with the Department of Conservation.
 - c. That roost trees and foraging corridors identified in the EIA be given permanent protection through the Structure Plan or an appropriate overlay. With setbacks and clear rules preventing tree removal without ecological assessment and effects management to protect pekapeka and their habitat.

¹ Clause 3.1(1), Part 3: implementation NPSIB

- d. That lighting management standards recommended by Tītoki Landcare be incorporated as enforceable rules within the Structure Plan and zone provisions, to protect bat foraging habitat from light spill.
 - e. That restoration planting, ecological corridor, and pest control requirements from the EIA be included as binding obligations, with clear timeframes, funding arrangements, and monitoring requirements.
 - f. That the applicant be required to demonstrate, to the satisfaction of the hearings panel, that the recommended measures will achieve the protection of significant indigenous biodiversity values consistent with the objectives and policies of National Policy Statement for Indigenous Biodiversity 2023.
- 5.2. The biodiversity outcomes of an ecological assessment only translate into real-world when its recommendations are adopted into plan requirements that set an obligation of development activities, not left as optional or deferred to a later time which may or may not adopt these recommendations.
- 5.3. Forest & Bird acknowledges the good-faith effort reflected in commissioning the Tītoki Landcare EIA and welcomes the opportunity to support PC37 on the basis that its ecological recommendations are given full effect.

Forest & Bird would like to be heard in support of its submission.

Dated: April 2026

Ngā mihi,

Elvisa van der Leden
 Waikato & Taranaki Regional Conservation Manager
 Forest & Bird