

**BEFORE THE INDEPENDENT HEARINGS PANEL  
OF HAMILTON CITY COUNCIL**

**UNDER** the Resource Management Act 1991 ("**RMA**")

**AND**

**IN THE MATTER** of Private Plan Change 17 to the Hamilton City  
Operative District Plan ("**PC17**")

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**SUMMARY STATEMENT OF EXPERT EVIDENCE OF GERARDUS HENRICUS  
ANTHONIUS KESSELS ON BEHALF OF FONTERRA LIMITED**

**ECOLOGY (BATS)**

**20 NOVEMBER 2025**

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**1. SUMMARY OF EVIDENCE**

- 1.1 My name is Gerardus (Gerry) Henricus Anthonius Kessels. I am managing director of Kessels & Associates Limited (trading as "**Bluewattle Ecology**"), a specialist ecology assessment consultancy firm. My qualifications and experience are set out in my Statement of Evidence for PC17 dated 7 October 2025.
- 1.2 I have been providing Fonterra Limited ("**Fonterra**") with expert advice on bat ecology in relation to PC17. I provided a statement of evidence on behalf of Fonterra for PC17 dated 7 October 2025.
- 1.3 I confirm that I have read the Expert Witness Code of Conduct set out in the Environment Court's Practice Note 2023. I have complied with the Code of Conduct in preparing this evidence and I agree to comply with it while giving oral evidence before the Hearings Commissioners. Except where I state that I am relying on the evidence of another person, this written evidence is within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed in this evidence.
- 1.4 I confirm I have read the section 42A report and supporting documentation, and all submitter evidence available, and I am not aware of any disagreement with the section 42A reporting team or other experts in relation to my expert evidence provided for PC17.

**Gerardus Kessels**  
**20 November 2025**