

Proposed Private District Plan Change 53

**190, 236 and 268 Stratton Street, Normandale –
Rezoning to Rural Residential Activity Area**

Full Set of Further Submissions

From: Joyanne Stevens <joyannestevens@hotmail.com>
Sent: Friday, 27 March 2020 4:18 PM
To: Corporate Records
Subject: Further Submission on Plan Change 53 attached
Attachments: Further Submission Plan Change 53.pdf

Joyanne & Alan Stevens

RMA FORM 6

Further Submission on publicly notified Proposed District Plan Change

Clause 8 of the First Schedule, Resource Management Act 1991



To: Chief Executive, Hutt City Council

1. This is a further submission from:

Full Name	Stevens Alan & Joyanne	
	<small>Last</small>	<small>First</small>
Company/Organisation		
Contact if different		
Address		
	<small>Number</small>	<small>Street</small>
	<small>Suburb</small>	
	<small>City</small>	<small>Postcode</small>
Address for Service if different	<small>Postal Address</small> joyannestevens@hotmail.com	<small>Courier Address</small>
Phone	<small>Home</small>	<small>Work</small>
	<small>Mobile</small>	
Email	joyannestevens@hotmail.com	

2. This is a **further submission** in support of or opposition to a submission on the following proposed change to the City of Lower Hutt District Plan:

Proposed District Plan Change No:

53

Title of Proposed District Plan Change:

190, 236 & 268 Stratton Street Rezoning

3. I consider that under Clause 8 of the First Schedule of the Resource Management Act I may make a further submission because:



I represent a relevant aspect of the public interest

Please give details: Transport/roading effects of the proposal will significantly impact the wider public.



I have an interest in the Proposed Plan Change that is greater than the interest of the general public

Please give details: Transport/roading effects, particularly on Normandale Road but also on Cottle Park Drive and lower Stratton Street adjacent to Poto Road, will directly affect access to our property.



I represent Hutt City Council

4. I support or oppose the submission of:

Name and address of original submitter and submission number of original submission:

We SUPPORT the following submissions:

DPC53/2, Royal Forest & Bird Protection Society of NZ Inc, PO Box 631, Wellington 6140

DPC53/3, Karen Self, 308 Normandale Road, Lower Hutt 5010

DPC53/4, Matthew Willard, 89 Stratton Street, Lower Hutt 5010

DPC53/5, Peter & Sandra Matcham, pmatcham@actrix.co.nz

DPC53/6, Friends of Belmont Regional Park, pmatcham@actrix.co.nz

DPC53/7, Pam Guest & Peter Shaw, 177 Stratton Street, Lower Hutt 5010

(Please use additional pages if you wish)

5. The particular parts of the submission I support or oppose are:

Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal
DPC53/2 - biodiversity effects, appropriateness of leaving consideration of effects to a resource consent process and section 32 evaluation. DPC53/3 - effects on transport network, amenity of Old Coach Road and section 32 evaluation. DPC53/4 - safety of transport network, increased traffic, property access, safety of non-vehicular road users and section 32 evaluation. DPC53/5 - transport network, amenity and character, ecological effects, biodiversity and section 32 evaluation. DPC53/6 - transport network, visual effects, reverse sensitivity, ecological effects and section 32 evaluation. DPC53/7 - transport network, indigenous vegetation and fauna, ecological effects and section 32 evaluation.

(Please use additional pages if you wish)

6. The reasons for my support or opposition are:

Please give reasons:

The proposal would have significant effects on all the areas outlined above. In particular, detailed consideration of the effects needs to take place as part of the plan change process to ensure indigenous biodiversity is adequately considered and participation by affected parties is provided for. Relying on the RMA and subdivision rules is not appropriate in these circumstances.

The traffic report submitted with the application is of very poor quality. It falls short in accuracy, has many subjective comments and is misleading (probably deliberately). Traffic considerations are absolutely key to this proposal and must be addressed wisely in the public interest..

(Please use additional pages if you wish)

7. I seek that the whole or part *[describe part]* of the submission be allowed or disallowed:

Please give precise details:

We support all the comments made by submitters. These are real issues that need to be addressed before any consideration can be given to approving the plan change.

(Please use additional pages if you wish)

8. I ☒ **wish** ☐ **do not wish** to be heard in support of my submission

(Please tick one)

9. If others make a similar submission,

I ☒ **will** ☐ **will not** consider presenting a joint case with them at the hearing.

(Please tick one)

Signature of submitter
(or person authorised to sign
on behalf of submitter)

A & J Stevens

27.3.20

Date

A signature is not required if you make your submission by electronic means

Personal information provided by you in your submission will be used to enable Hutt City Council to administer the submission process and will be made public. You have the right under the Privacy Act 1993 to obtain access to and to request correction of any personal information held by the Council concerning you.

From: Amelia Geary <A.Geary@forestandbird.org.nz>
Sent: Monday, 30 March 2020 9:00 AM
To: Corporate Records; pmatcham@actrix.co.nz; pam.guestnz@gmail.com
Subject: Forest & Bird's further submission PC53 Hutt City
Attachments: Forest&Bird_PC53_FurtherSubmission.pdf

Good morning

Please find attached Forest & Bird's further submission on Hutt City's PC53. Friends of Belmont and Pam Guest also included by way of service.

Regards,
Amelia

Amelia Geary
REGIONAL MANAGER - LOWER NORTH ISLAND
Horizons, Wellington

Royal Forest and Bird Protection Society of New Zealand Inc.
Ground Floor . 205 Victoria St . PO Box 631 . Wellington . New Zealand
DD 04 801 2218 **M** 022 039 9363

Please note, my days of work are generally Monday – Wednesday.

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



Forest & Bird
GIVING NATURE A VOICE

30 March 2020

**Further Submission on the Hutt City
Proposed Private District Plan Change 53**

Emailed to: submissions@huttcity.govt.nz

From: Forest & Bird
PO Box 631
Wellington 6140
Attn: Amelia Geary
a.geary@forestandbird.org.nz

Royal Forest and Bird Protection
Society of New Zealand Inc.

Head Office:
PO Box 613
Wellington
New Zealand
P: +64 4 3857374

www.forestandbird.org.nz

INTRODUCTION

1. The Royal Forest and Bird Protection Society of New Zealand (Forest & Bird) is New Zealand's largest independent conservation organisation. It is independently funded by private subscription, donations and bequests. Forest & Bird's mission is to protect New Zealand's unique flora and fauna and its habitat. Forest & Bird is currently involved in processes before the Court to improve the Hutt City district plan provisions for the protection of significant natural areas and to implement Council's functions for the maintenance of indigenous biodiversity.
2. Forest & Bird's submission relates to submissions on Hutt City Council's Proposed Private District Plan Change 53.
3. Forest & Bird could not gain an advantage in trade competition through this submission.
4. Forest & Bird wishes to be heard in relation to this submission.

SUBMISSION

5. Forest & Bird **supports** the submission of Friends of Belmont Regional Park and Pam Guest and Peter Shaw where they are not in conflict with Forest & Bird's original submission.

REASONS

Friends of Belmont Regional Park

6. Forest & Bird agrees that it is inappropriate to dismiss concerns raised by GWRC in section 4.1 of the s32 report as a matter to raise at the time of consent as this fails to consider the impact

of subdivision at a catchment level thereby failing to give effect to policies 40 and 43 of the RPS.

7. Furthermore, deferring protection of native vegetation on the sites to the time of consent puts protection squarely under Chapter 11 of the District Plan. The s32 claims that given one of the assessment matters of any subdivision is how the proposal protects Significant Natural, Cultural or Archaeological Resources, then there is opportunity to protect area of significant ecological values through the existing rule framework in the District Plan. What the s32 then fails to acknowledge is that there are no assessment criteria in the District Plan outlining how these significant values will be protected. Therefore, there is not an adequate rule framework to ensure protection.
8. Forest & Bird agrees that the assessment of s7 of the RMA does not allow for protection of natural and physical resources. As Friends of Belmont Regional Park point out, the s32 report acknowledges the existence of high quality native ecosystems especially within gullies but then fails to assess how these will be protected under s7(d, f, & i) of the RMA.
9. Forest & Bird agrees that in section 5.3 of the s32 there is a failure to recognise the relevance of the NPS-FM on this plan change.
10. Forest & Bird agrees that the Landscape, Natural Character and Ecology effects assessment in section 7.4 is insufficient. Two of the three properties subject to this proposed Plan Change (190 and 236 Stratton Street) are partly affected by an identified SNR (SNR38 – Normandale Road Bush). The s32 report cites chapter 14E of the District Plan which includes objectives, policies and rules to protect identified SNRs from inappropriate subdivision, use and development. However, the assessment that “as a result of two Environment Court decisions from 2004 the rules do not apply to identified SNRs on private land” does not reflect best practice nor the Wellington RPS. Not to mention, the cases cited are outdated.

Pam Guest and Peter Shaw

11. Forest & Bird agrees that the proposal is not consistent with s6(c) of the RMA, given that significant natural areas have been identified within the plan change area. It is noted that SNR 38 – Normandale Road Bush and additional significant areas partly affect all three properties, yet no new site specific rules are proposed. Forest & Bird supports the submitters’ assertion that provision for the protection of the areas of significance should be provided as part of this plan change, regardless of the current District Plan rules. This would give effect to sections 6c and 31(b)(iii) of the RMA and Policies 23 and 24 or the Wellington RPS.
12. Forest & Bird agrees that policies 40, 42 and 43 of the Wellington RPS are applicable. These were disregarded in the s32 report due to the argument that they would be addressed at the time of consent.
13. Likewise, the applicability of the NRP was further disregarded based on the assumption that waterbodies on the site were ephemeral or intermittent. However, Forest & Bird supports the submitters’ assertion that objectives O25 and O27 apply as there are at least two permanently flowing streams within the area of the plan change. We similarly endorse the view that provision should be made to protect these waterways and their riparian margins at the plan

change stage, rather than leaving this to be assessed on a case by case basis as part of individual subdivision consent applications.

RELIEF SOUGHT

14. Forest & Bird seeks that the aforementioned submission points be allowed.

Amelia Geary
Regional Manager
Forest & Bird

From: Pete <pmatcham@actrix.co.nz>
Sent: Monday, 30 March 2020 9:58 AM
To: Joyanne Stevens; A.Geary@forestandbird.org.nz; fobrp@actrix.co.nz;
badelly_the_witch@yahoo.co.uk; pam.guestnz@gmail.com; Corporate Records
Subject: PPC 53 further submission
Attachments: 20200329 Further Submission on publicly notified Proposed Private District Plan
Change 53.pdf

Hi folks,

please find attached our further submission on PPC 53.

Copied to Alan and Joyanne Stevens, Karen Self, Friends of Belmont Regional Park and Pam Guest by way of service.

keep safe

Pete and Sandie Matcham

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This email has been checked for viruses by AVG.

<https://www.avg.com>

Further Submission on publicly notified Proposed Private District Plan Change 53

To: The Chief Executive,
Hutt City Council
Private Bag 31912
Lower Hutt 5040

Email: submissions@huttcity.govt.nz

This is a further submission from Peter and Sandra Matcham under clause 8 of the 1st Schedule of the Resource Management Act (RMA)

Address 301 Normandale Road
Lower Hutt 5010
Tel: (04) 565 1083
email: pmatcham@actrix.co.nz

1. We have an interest in the proposed plan change greater than the general public as:
 - a Our property adjoins the area subject to the Proposed Plan Change
 - b We have made a submission on the Proposed Plan Change
2. We wish to be heard in support of our submission
3. If others make a similar submission we would consider presenting a joint case with them.

Our further submission is contained in the following table.

Signature of submitter



Date: 2020-03-27

Submission Ref and relevant part.	Point made in submission	Position of further submitter	Reasons for support / opposition	Outcome sought
DPC53/1 Alan & Joyanne Stevens	The traffic report provided is deficient and misleading ...Traffic associated with creating 23 potential lots on already substandard roads will create added pressure on the roads and intersections within several kilometres of the sites, including vehicular, non-motorised, pedestrian and horse usage of these rural roads. (transcribed from image and subject to error)	Support	We concur that the traffic report fails totally to consider the normal traffic pattern on the roads which would be affected by development at the scale enabled by the PPC. Only vehicular traffic is considered despite the wide variety of user types that make up a normal days usage, with non-vehicular traffic often dominating. This failure, together with the assumption that reported Road Traffic Accidents are a valid basis for risk assessment demonstrates a clear failure to understand the road environment in the area and the risk to vulnerable road users from a 150% increase in vehicular traffic. We also consider that the report fails to consider the directive of the 2019 GPS on land transport which give safety of vulnerable users priority.	Accept the submission and reject the traffic report.
DPC53/2 Forest & Bird Para 7 (a) (b) and (c)	Forest & Bird considers that the effects of the plan change on biodiversity, including streams and freshwater and the potential loss of natural habitats and effects on freshwater as a result of the plan change are inconsistent with the: a. Wellington Regional Policy Statement; b. National Policy Statement for Freshwater Management; c. Proposed National Policy Statement on Indigenous biodiversity	Support	The area of PPC53 contains permanent streams that extend beyond that area, and which form an integral part of the Korokoro catchment. Their courses are dominated by regenerating native bush which contain a wide diversity of flora from secondary colonisers, to emergent and canopy species, in steep gullies and adjoining hillsides. The zoning sought by the PPC has no provision to establish the primacy of te Mana o te Wai and through this te Hauora o te Taiao as required in the NPS-FM (2017). It is also evident that any subdivision with the associated creation of building sites and roading will have a major long term effect in terms of surface permeability and contaminant run off that would be directly contrary to objective 2A of the NPS-FM to improve and maintain the overall quality of fresh water, and policy 14 of the	Accept the submission

			<p>Wellington RPS to minimise storm water contamination from development.</p> <p>We consider that PPC53 also fails to address the requirements of objectives 12(b) Safeguarding the life sustaining capacity of water bodies, Objective 13 ... support healthy functioning ecosystems, and associated policies, in particular policies 40 -43, of the Wellington RPS.</p>	
DPC53/2 Forest & Bird Para 7 (d)	Forest & Bird considers that the effects of the plan change on biodiversity, including streams and freshwater and the potential loss of natural habitats and effects on freshwater as a result of the plan change are inconsistent with d. Section 6 of the RMA.	Support	<p>We note that under RMA Section 6(c) protection is the imperative action required. We further note that the reference to 'Matters of national importance' in Section 6 defines the matter to be considered. It does not refer to the geographical scope of the matter. In recognising and providing for the protection of '<i>significant indigenous vegetation and significant habitats of indigenous fauna</i>' it is the local context that matters. Therefore it is the level of significance in terms of the District Plan, and of the local environment which must be considered. As noted in our and other submissions, the area subject to PPC 53 contains identified although not gazetted, areas of natural significance (SNAs). To meet the Councils' obligations under the Section 6(c) RMA and the Wellington RPS on biodiversity, any change in zoning must provide for and give effect to the protection of indigenous biodiversity and as a minimum areas identified as SNAs be excluded from any zone change.</p>	Accept the submission

DPC53/2 Forest & Bird Para 8	That the rezoning of land from General Rural Activity Area to Rural Residential Activity Area will afford lower protection to the biodiversity values of these areas due to the changes of use, particularly subdivision provided for under the activity zoning	Support	The scope of the potential subdivision permitted under the requested zoning would entail the loss of significant areas of regenerating native biodiversity and development in accordance with the permitted limits would create major effects on the water quality in the Korokoro catchment contrary to the requirements of the NPS-FM.	Accept the submission
DPC53/2 Forest & Bird Para 9	It is not appropriate to leave the consideration of the effects of activities which may be provided for under the new zoning to later consent processes when those effects can better be addressed at the time of the zoning plan change. The Council is unlikely to have full and adequate information before it when making a decision at the subdivision stage for the following reasons: a. The District Plan fails to provide adequate protection for s6(c) areas; b. The Rural Residential Activity Area and subdivision rules do not provide scope for council to implement their functions for the maintenance of indigenous biological diversity under s31(1)(b)(iii); c. The RMA limitations on notification effectively precludes public notification, other than in exceptional circumstances, for subdivision consent applications.	Support	As noted in our submission and in our comments above, the suggestion that consideration of the environmental effects that would be created by subdivision at the scale enabled by the requested change, is contrary to both international best practice, the overall purpose of the RMA and Policy 64 of the Wellington RPS which requires consideration a whole of catchment approach. With regard to points (a) and (b) We concur that the District Plan and in particular the Rural Residential Activity Area and subdivision rules do not reflect current legislative requirements under the NPS –FM, nor the changes in public expectations with regard to the protection of fresh water, indigenous biodiversity and amenity values. We understand from HCC staff, that the District Plan is due to be revised in the near future at which point these defects will no doubt be addressed. In the meantime we consider that to allow a change under the existing requirements of the District Plan would be a mistake.	Accept the submission
DPC53/2 Forest & Bird Para 10	This means that the only opportunity for Council to have full and adequate information before it is at the time of considering a Plan Change or through a full plan review process.	Support		Accept the submission

DPC53/2 Forest & Bird Para 11	The section 32 report provided by the applicant is inadequate and fails to consider the potential effects of the activity and councils responsibilities and functions under the RMA. The council must undertake its own s32 analysis.	Support	The inaccuracies, inadequate investigation and analysis of Section 32 matters noted in our submission, together with its failure to address the overarching requirements of national, regional and local policies on biodiversity calls into question the validity and competence of the entire report. We do not consider the application presented for the proposed plan change a valid basis for a decision.	Accept the submission
DPC53/2 Forest & Bird Para 12	That overall the plan change will not achieve the purpose of the RMA.	Support	We support this view for the reasons given in our submission and in comments above.	Accept the submission
DPC53/2 Forest & Bird Para 12	Forest & Bird seeks that the plan change application be declined.	Support in part	We consider that on balance the inability of the zoning criteria sought to give effect to Section 6 of the RMA, the Wellington RPS, the NPS-FM, and provisions of the District plan with regard to the maintenance and protection of water quality, indigenous bio-diversity and amenity landscape, together with the failure of subdivision and building consent application process to adequately consider wider and cumulative environmental effects that this change would enable, means that the proposal should be rejected in its entirety.	Reject the proposal in its current form
DPC53/3 Karen Self	No vehicle access be given to proposed subdivided lots via Normandale Road past the current entrance to the Old Coach Road.	Support	The assumption made in PPC53 that access to the area is available via the Old Coach Road-Belmont to Pauatahanui (Mis-named Normandale Road in the PPC) is not only contrary to the reality, but if considered would be contrary to the requirements of RMA Section 6(f) and Objective 15 and associated policies of the Wellington RPS. We further note here that in our opinion, the degree of protection for historic artefacts determined by the High Court in <i>Lambton Quay Properties Nominee Ltd</i>	Accept the submission

			<i>v Wellington City Council</i> [2014] NZHC 878 at [70-71] has by implication been increased by the decision of the Environment Court in <i>EDS vs King Salmon</i> , and that although the primary means by which protection of historic heritage is provided for is by scheduling items or areas in the district plan, section 6(f) still offers protection in its absence. (<i>New Zealand Historic Places Trust v Waitaki DC</i> (NZEnvC C034/08, 3 April 2008))	
DPC53/6 Friends of Belmont Regional Park	Our concerns are based around two areas. First the wider environmental effects that would follow the plan change. In line with the arguments by the applicant's consultant, we consider the plan change as an enabling change. Regardless of the intentions and values of the current property owners, such a change would mean that they and future owners could not be prevented from undertaking development in the peri-urban environment that would be considered on a piecemeal basis rather than as a totality – death by a thousand cuts. Such development will radically alter the visual and amenity values of the park's environs both directly and by increasing the creep of suburbanisation into the rural areas, with the attendant perils of reverse sensitivity from changing expectations	Support	As noted in our reasons for supporting DPC53/2 Forest & Bird Para 11 above, we consider the suggestion that environmental and societal effects can be deferred to a piecemeal consideration at resource consent stage demonstrates a failure to understand the basic concepts of ecological assessment and the increasing importance of amenity value. We also support the concern over reverse sensitivity.	Accept the submission

DPC53/6 Friends of Belmont Regional Park	Section 32 Assessment – scale and significance		In addition to the points made in our own submission which support this section, we would argue that in adopting a numeric scale to assess scale and significance the section is fundamentally flawed. The greatest danger in a subjective assessment is to base this on a numeric scale since this is assumed to be interval when in reality any assessment here is ordinal.	
DPC53/6 Friends of Belmont Regional Park	3.5 Quantification		We note again a fundamental methodological flaw in the quantification in that dollar cost is assumed a valid proxy for non-monetary values. This assumption leads, when considering mitigation and avoidance costs, to goal transference from ecological cost equivalence, to dollar cost minimisation, and should be avoided. The use of dollar proxy also encourages the limiting of values considered to those easily quantified rather than their ecological significance.	
DPC53/6 Friends of Belmont Regional Park	Section 4.1 Consltation (sic)	Support		Accept the submission
DPC53/6 Friends of Belmont Regional Park	Section 5.1.2 and 7	Support	As noted in our reasons for support of DPC53/2 Forest & Bird Para 7 (d), the failure to consider Kaitiakitanga and RMA Section 6(c) is to negate the entire purpose of the RMA.	Accept the submission

DPC53/6 Friends of Belmont Regional Park	Section 5.3 –NPS –FM catchment level management of land use	Support	As noted in our reasons for support of DPC53/2 Forest & Bird Para 7 (a) (b) and (c) We further note HCC's acknowledgement of the importance of catchment level assessment in its participation in the te Whanganui a Tara Whaitua process.	Accept the submission
DPC53/6 Friends of Belmont Regional Park	Section 6.1 Evaluation of options	Support	We also consider this section to be methodologically flawed and illogical. It utilises straw man arguments based on circular hypotheticals and attempts to equate incommensurables.	Accept the submission and reject the evaluation
DPC53/6 Friends of Belmont Regional Park	7.1 Amenity and Character Effects and 7.4 Landscape Natural Character and Ecology effects	Support	We believe that the failure to even consider the ecological, amenity and landscape effects of the proposed change indefensible. To suggest that these will be addressed later during a process when the opportunity to consider wider and cumulative effects are curtailed and public consultation denied, is in our opinion a deliberate attempt to avoid their consideration completely.	Accept the submission
DPC53/6 Friends of Belmont Regional Park	Transport impact assessment	Support		Accept the submission

DPC53/7 Pam Guest	<p>Significant indigenous vegetation</p> <p>We disagree with the assessment under Section 5.1.2 that the proposal is consistent with Section 6(c) of the RMA, given that significant natural areas have already been identified within the plan change area. As recognised in the draft National Policy Statement for Indigenous Biodiversity, New Zealand's indigenous biodiversity is in decline, with much of the remaining indigenous biodiversity on privately owned land. District councils have an important role to play in seeking actions from private landowners to ensure indigenous biodiversity is maintained, noting their function under RMA Section 31(b)(iii) to:</p> <p>“control of any actual or potential effects of the use, development, or protection of land, including for the purpose of—</p> <p>(iii) the maintenance of indigenous biological diversity:</p> <p>We consider that provision should be made as part of the plan change to require the protection of those areas already identified as having, or potentially having, significant indigenous vegetation and significant habitats of indigenous fauna as a pre-requisite for more intensive development, irrespective of whether the district plan has mandatory restrictions on private landowners. This is consistent not only with RMA s6(c), but also with Policies 23 and 24 of the Regional Policy Statement for the Wellington Region.</p>	Support	<p>In addition to the points made in in our reasons for support of DPC53/2 Forest & Bird, Para 7 (d), we note the requirement on councils to maintain indigenous biodiversity under RMA S31(b)(iii) has in the words of the Parliamentary Commissioner for the Environment been characterised by “... <i>an undervaluing of biodiversity in decision making and inadequate regulatory protection contributing to indigenous biodiversity loss.</i>” We consider that to avoid this charge, HCC must require a full and independent ecological evaluation of the land in question.</p>	Accept the submission
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DPC53/7 Pam Guest	<p>We note RPS policies –</p> <p>Policy 40 Maintaining and enhancing aquatic ecosystem health in water bodies.</p> <p>Policy 42 Minimising contamination in stormwater from development.</p> <p>Policy 43 Protecting aquatic ecological function of water bodies</p> <p>Also relevant objectives and policies in the Proposed Natural Resources Regional Plan have not been recognised, in particular:</p> <p>Objective O25 Biodiversity, aquatic ecosystem health and mahinga kai in fresh water bodies and the coastal marine area are safeguarded</p> <p>...</p> <p>Objective O27</p> <p>Vegetated riparian margins are established, maintained, or restored to enhance water quality, aquatic ecosystem health, mahinga kai and indigenous biodiversity of rivers, lakes, natural wetlands and the coastal marine area.</p> <p>There are at least two permanently flowing streams within the plan change area (not ephemeral nor intermittent as assessed in the application). We consider, contrary to the assessment (para 108), that provision should be made to protect these waterways and their riparian margins, at the plan change stage, rather than leaving this to be assessed on a case by case basis as part of individual subdivision consent applications. This risks inevitable cumulative effects, rather than taking a more strategic approach which is to assess the values of and risks to these streams</p>	Support	As noted in our reasons for support of DPC53/2 Forest & Bird Para 7 (a) (b) and (c)	Accept the submission
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	from the entire plan change proposal. We note that the request by the regional council to prepare a structure plan was rejected but consider that this would have provided a more strategic approach to protecting environmental values, including aquatic ecosystem health and indigenous biodiversity			
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