

Ms Rachel Helme
Hutt City Council
Private Bag 31912,
Lower Hutt 5040

2 August 2011

Dear Rachel

Proposed Plan Change 22: Kelso Grove rezoning

You have asked me (letter 8 July 2011) to review submissions received on the above proposed Plan Change, and consider ecological issues raised by the submissions. I have concentrated on the submission by Greater Wellington Regional Council (DPP12-5-22-005) as it is the most detailed submission concerning ecological issues, but the points I make are relevant to some other submission points by other submitters, as noted.

My comments are as follows:

1. Integrity of the Kelson/Woodroyd Bush Key Native Ecosystem (KNE) (GW submission point 4.3)

I consider that most of the site is not a significant part of the KNE. The full description of significant values for the KNE is "Kohekohe, tawa and karaka stands. With large rimus and northern rata. Woodpigeon breeding site. Nikau understorey". My description of the vegetation on the site indicates that none of these values would apply to any part of the site. I did not observe any of these species present and while kereru (woodpigeon) may use the site from time to time I consider it unlikely to contain breeding habitat.

However as described in my assessment a small part of the site has significant values that are comparable to those of the core part of the KNE – viz the rectangular lobe at the northern end of the site (between the end of Kelso Drive and the gully to the east of Kelso Drive). This most valuable area includes the eastern edge of Lot 15. The vegetation and habitat values of this part of the site are the highest in the site, although even this part does not contain the vegetation species noted in the values statement for the KNE. The area of this most valuable portion is less than 0.5 ha, out of a total area of 70 ha for the KNE. Removal of this vegetation, although small, would have an adverse effect on the ecological value of the KNE as a whole.

As I indicated, the ecological value of the rest of the site is mainly as a buffer (protection) to the core part of the KNE, and as a buffer, it is of relatively less value as it is at the edge of the KNE area and is in poor ecological condition. The strip of vegetation along the north-eastern boundary of the playing field would have the highest buffering value, although it does not have any particularly valuable vegetation in it, because it is also relatively close to the gully and the forest vegetation described in para 19 of my assessment. However, if vegetation was removed from the remainder of the site, in my opinion it would not have a significant effect on the integrity of the KNE.

2. Inventory and assessment context for Hutt City (Greater Wellington submission point 4.5)

I make the point in all assessments that I undertake for Hutt City that there is no city-wide survey of vegetation or ecological sites, so it is not easy to make comparative assessments. I use my experience of the vegetation and natural areas over the whole city to assess significance. However, I do not consider there was any particular difficulty in determining the significance of this site, given the information I had available such as the KNE and SNR descriptions, as well as my own field observations.

3. Policy 22 of the Proposed Regional Policy Statement (PRPS) and significance of the LENZ classification of the site (Greater Wellington submission points 4.7 and 4.8)

The habitat is part of a land environment that is considered no longer commonplace and poorly represented, so PRPS policy 22 does have some relevance. This does not necessarily mean that all parts of the land environment should be protected, only that the significance and values of any remaining vegetation should be carefully considered against the policy criteria. My assessment is that some parts of the vegetation of the site are significant, as described in paras 17-22 of my report. However, as discussed above and in my original assessment, not all the vegetation is significant, as it clearly does not have the ecological values of "natural" vegetation in this environment. In theory, the grassed sportsfield, as part of the same environment, has as much significance in respect of PRPS policy 22 as the weedy vegetation and pine areas around it. I do not consider any additional assessment of the significance of the vegetation on the site is required, other than to confirm the correct LENZ environment for the site. I note that the LENZ classification of Environment C2.1e (supplied to me by Greater Wellington for my assessment) does not appear to match the actual topographic and soil parent material characteristics of the site very well.

4. Relevance of the Proposed National Policy Statement on biodiversity (GW submission point 4.7)

I consider that Policy 2d as worded in the Proposed NPS may apply, to the extent that the vegetation on the site falls into typical "natural" vegetation of environment C2.1e. Policy 2d as proposed would require:

"local authorities, in considering the effects of any matter shall, in addition to [considering] any area of significant indigenous vegetation or a significant habitat of indigenous fauna identified in, or by, provisions of any relevant regional policy statement, or regional or district plan, regard the following as significant indigenous vegetation or significant habitat of indigenous fauna:

...d. land environments, defined by Land Environments of New Zealand at Level IV (2003), that have 20 per cent or less remaining in indigenous vegetation cover"

I note that this policy is from a proposed policy statement that is still subject to ministerial approval after he considers submissions on the proposed NPS which closed in May 2011. No timetable has been set for Ministerial decision on the proposed NPS. I also note that as worded the proposed policy does not specify the vegetation/land cover to which it would apply, so would theoretically have relevance to the many areas within Hutt City, including roads, buildings, gardens, houses etc, which occur with LENZ unit C2.1e. In my opinion, if this proposed policy is approved as worded, considerable discretion will still be needed in interpreting which areas the LENZ environments appropriately refer to.

5. Significance of the affected vegetation overall (Greater Wellington section 4; Wendy Saunders and Gerry Dance, submission points 2.9, 2.29; James Hogan submission point 3.1; Russell and Evelyn Stewart submission point 4.1)

In general, in considering the possible effects of the proposed plan change, I have also considered the potential application of both proposed policy statements (regional and national). Because the proposal would result in the loss of some relatively rare and reduced forest as assessed by the policy statements I have concluded there is a potential for a significant adverse ecological effect of residential development resulting from the proposed plan change, even though I showed that the qualities of most of the forest concerned were low. However, I also concluded that there were avoidance and mitigation measures possible which would reduce any actual or potential adverse effects to no more than minor. I then went on to discuss such measures (paras 73 – 85).

6. Submitted changes to the proposed residential boundaries (Greater Wellington, section 5).

I agree with some of these suggestions, which are in line with my recommendations, but not all of them. In para 75 I outlined some options for protecting the most significant vegetation on the site, which occurs in the northern part of the site, including part of Lot 15. Withdrawal of the whole of Lot 15 from the area of the proposed Plan Change would be my recommended option as it would result in greater certainty of protection for the most significant vegetation on the site.

I do not agree that the remaining lots (1,2,3,14, parts of 4,5,6 and 8) need be withdrawn from the proposed plan change although I recommended that some consideration is given to the ecological (and amenity) values of the tall trees on the western side of the sportsfield in the subdivision process (as per my para 77). I also agree that the area containing significant vegetation or the whole of Lot 15 if it is withdrawn should be incorporated into the Recreation Reserve. I would also recommend that all parts of the site not being rezoned and remaining under Hutt City Council ownership be considered to be brought into the existing Significant Natural Resource area, or equivalent protection. I consider that these and my other recommendations (weed and replanting programme, cat-free policy etc) would enhance the ecological values of the site and surrounding area more than simply withdrawing the proposal and carrying on the status quo, or adopting the relief sought by Greater Wellington.

7. Certainty of relying on subdivision process to ensure that adverse ecological effects of developing the site (Greater Wellington, section 5)

As discussed above I would like to see the significant vegetation identified on the eastern side of the site protected by withdrawing Lot 15 entirely. I would be comfortable if the other matters addressed in my section on avoidance and mitigation (paras 73-85) are dealt with at the subdivision stage as I consider that the District Plan has the relevant policies to deal with them satisfactorily. My recommendation regarding a complementary weed control and replanting programme cannot however be easily dealt with either by way of the proposed Plan Change or the subdivision process but needs to be addressed separately. I would be very pleased to see Hutt City Council develop such a programme, for the site and surrounding areas (the recreation reserve to the northwest Lot 1 DP 47792, and the fee simple land Pt Lot 1 DP 6963), in association with the other agencies and landowners. I believe this would be a very positive measure which I hope would also give submitters reassurance that the matters they have brought up in submissions were being addressed. I note that two of the five submitters support my recommendation for such a programme.

8. Current weed and pest control programmes (Greater Wellington submission point 4.3; Wendy Saunders and Gerry Dance, submission point 2.28)

It should be recognised that private landowners are also taking an active role in existing weed and pest control work. For example, Mr Wootton (submitter 1), in his earlier submission on the proposed revocation of reserve status (2008), described work by himself and others in

Woodroyd Bush. This is one of reasons I have recommended further collaborative weed and pest control work for the site and surrounding areas.

9. Trimming of vegetation (Wendy Saunders and Gerry Dance, submission point 2.23)

I do not support any suggestion that vegetation in the current reserve at the end of Kelso Grove should be trimmed. As discussed above, this area includes some of the most valuable vegetation on the site.

I hope these comments are helpful. Please contact me if you require any further advice.

Yours sincerely

A handwritten signature in cursive script that reads "Paul Blaschke".

Paul Blaschke

2 August 2011