
Form 6: Further submission in support of, or in opposition to, submission on notified proposed policy statement or plan, change or variation

Pursuant to clause 8 of the First Schedule of the Resource Management Act 1991

To: Hutt City Council (**the Council**)

Name of submitter: Director-General of Conservation (the **Director-General**)

1. This is a further submission in support of (or in opposition to) a submission on the following proposed plan (the **Proposal**):

Proposed Lower Hutt District Plan

2. I could not gain an advantage in trade competition through this submission.
3. The **Director-General** represents relevant aspects of public interest and has interest in the proposal that is greater than the interest the general public. The Director-General has all the powers reasonably necessary to enable the Department of Conservation (**DOC**) to perform its functions¹. The Conservation Act 1987 (the **CA**) sets out DOC's functions which include (amongst other things) management of land and natural and historic resources for conservation purposes, preservation so far as is practicable of all indigenous freshwater fisheries, protection of recreational freshwater fisheries and freshwater fish habitats and advocacy for the conservation of natural resources and historic heritage². Section 2 of the CA defines 'conservation' to mean *'the preservation and protection of natural and historic resources for the purpose of maintaining their intrinsic values, providing for their appreciation and recreational enjoyment by the public, and safeguarding the options of future generations'*.
4. My views on specific submissions are set out in **Attachment 1** to this submission.
5. I wish to be heard in support of my further submission.

¹ Refer section 53 Conservation Act 1987.

² Conservation Act 1987, section 6.

6. If others make a similar submission, I will consider presenting a joint case with them at the hearing.
7. A copy of this submission has been served on the original submitters.



Angus Hulme-Moir
Manager Operations
Kāpiti Wellington
Department of Conservation
Acting pursuant to delegated authority on behalf the Director-General of Conservation

Date: 24 July 2025

Note: A copy of the Instrument of Delegation may be inspected at the Director-General's office at Conservation House Whare Kaupapa Atawhai, 18/32 Manners Street, Wellington 6011

Address for service:

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ATTACHMENT 1:

PROPOSED LOWER HUTT DISTRICT PLAN
FURTHER SUBMISSIONS BY THE DIRECTOR-GENERAL OF CONSERVATION

I support (or oppose) the submission of:	The submission point I support (or oppose)	The reasons for my support (or opposition) are:	I seek that the decision-maker allow/disallow the original submission (in full or in part)
424: Royal Forest and Bird Protection Society of New Zealand Inc.	8: Amend CCSD-01 to recognise carbon sequestering potential of indigenous biodiversity	Areas of indigenous biodiversity, including wetlands, play an important role in carbon sequestering, and it is appropriate that this is recognised in the strategic direction. This provides an additional rationale for increased protection of indigenous biodiversity, particularly via strengthened indigenous vegetation clearance rules, as sought in the Director-General's submission.	Allow
424: Royal Forest and Bird Protection Society of New Zealand Inc.	<p>1b: Seeks to include policy direction to apply the RPS Policy 23 criteria when assessing consent applications for any activity that may affect indigenous biodiversity.</p> <p>1c: Seeks to include or amend policy and rules to ensure that areas meeting the RPS Policy 23 criteria are protected.</p>	RPS Policy 23 sets out criteria for identifying indigenous ecosystems and habitats with significant indigenous biodiversity values. When resource consent is required for an activity that may affect indigenous biodiversity, it is appropriate that an assessment is made against these criteria, and that an appropriate policy framework is then applied to protect biodiversity values, based on that assessment.	Allow

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424: Royal Forest and Bird Protection Society of New Zealand Inc.	40: Add new policy to manage effects on indigenous biodiversity from subdivision, land use and development, including effects from fragmentation and loss of habitats and buffer areas	<p>As set out in the D’G’s submission, strengthened policies in the ECO section are required to give effect to the management approach required by:</p> <ul style="list-style-type: none"> • RPS policies 24B and 24D for indigenous ecosystems and habitats with significant indigenous biodiversity values and other significant habitats of indigenous fauna • RPS policies 24C and 24CC for indigenous biodiversity in the coastal environment • NPSIB policy 8 and clause 3.16 for effects on indigenous biodiversity in all other areas. <p>With reference to subdivision in particular, it is noted that proposed provisions do not provide for the assessment of effects on indigenous biodiversity arising from subdivision activities in the rural or coastal environments, except in certain circumstances within specific overlays.</p>	Allow
424: Royal Forest and Bird Protection Society of New Zealand Inc.	45: Add new rule relating to protection of indigenous biodiversity when subdividing	<p>The new rule requested by the submitter would require consideration of effects on indigenous biodiversity when subdivision is proposed in any zone, with restricted discretionary status applying (and discretion for consideration of “Protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna”), if any new undeveloped allotment included an area of indigenous biodiversity that met significance criteria of the RPS.</p> <p>This method is appropriate to manage the effects of subdivision on indigenous biodiversity, in accordance with the requirements of the RMA, NPSIB and RPS. As noted by the submitter, there is currently a gap in the proposed Plan regarding the biodiversity effects of subdivision.</p>	Allow

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452: Wellington Regional Council	109: Add a new objective as follows: “Landowner and community values in relation to indigenous biodiversity are recognised and provided for and their roles as stewards are supported.”	As noted by this submitter, there is a gap in the proposed plan with respect to acknowledging landowner and community values relating to indigenous biodiversity and supporting their roles as stewards. The requested new objective would give effect to RPS Change 1 Objective 16C (not under appeal).	Allow