

# Natural and Environmental Values / Ecosystems and Indigenous Biodiversity

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Steve West	2.2	Amend	[Refer to original submission for full reason, including attachment].	[Refer to original submission for full reason, including attachment].
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Steve West	2.3	Amend	[Refer to original submission for full reason, including attachment].	Seeks that if Significant Natural Areas are to apply to private land, incentives should be offered to compensate for loss of land value, to avoid landowners either removing natives, or reducing their environmental efforts to protect that bush. Providing incentives for new planting of natives so as to avoid a reduction in food sources for native birds and indigenous biodiversity.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Steve West	2.4	Oppose	Considers that the SNA rules are unworkable and have resulted in owners pre-emptively removing vegetation before the plan was notified. Because they are generic they do not suit urban land which have unique characteristics on each site, such as views, slopes and development potential.	Seeks that the Council work with private landowners to develop rules unique to specific properties rather than blanket rules.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Steve West	2.5	Support	Considers that SNAs on private urban land affect a large number of landowners but contribute little total area of vegetation. This creates increased work for Council staff and challenges to intensify housing within urban boundaries as some of the undeveloped city land will include native bush.	Supports that Significant Natural Areas do not apply to private residential land. [Inferred decision requested]
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Steve West	2.6	Amend	Considers that SNA criteria should be clarified so that it is more representative of Wellington's biodiversity. Much vegetation that is being identified as significant are common native species. [Refer to original submission for full reason]  Considers that the criteria being used by WCC for assessing for SNAs are broad with large areas of commonly found bush being captured by the policy settings as a result. [Refer to original submission for full reason]	Seeks that the Council have set its own specific criteria, rather than using those set by the Greater Wellington Regional Council, to reflect Wellington's natural and built-up environment.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Steve West	2.7	Not specified	Considers that the rules create significant legal risk for landowners if they misunderstand those rules, are unaware of future rule updates, or if the SNA boundaries are imprecisely defined.	Not specified.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Steve West	2.8	Amend	Considers that alternative options should be pursued to manage indigenous biodiversity on private land.  SNA provisions in the district plan including: making signing up to SNA rules a voluntary option, Council negotiate purchase of land or seek agreement from owner on rules, use QEII tools, and establish a city wide campaign of native planting.	Seeks that alternative policy options are explored: a) Remove all private land from the Significant Natural Area requirement. b) Make signing up to Significant Natural Areas on private land voluntary, and if coupled with Council incentives would see some landowners signing up to lock in their Significant Natural Area for future generations. c) If there were a significant area of private land (say more than one hectare) the Council could negotiate with that landowner to seek agreement on how to protect this area, or even to purchase the land for addition to the Council's land reserves. d) The Council could accept all types of protection including QEII and title conservation covenants. This would require the Council to create more nuanced maps with multiple protection measures shown (including Significant Natural Areas) as a measure of the protected indigenous biodiversity areas. e) Establish a program to encourage city wide planting of suitable natives to provide a broad spread of food across the city.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Shannon Andrews	12.1	Support	Supports WCC's decision to exclude SNAs from residential zones.	Retain as notified.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Peter Kelly	16.2	Support	Councillors have a democratic mandate to balance the interests of WCC residents against the important natural environment values represented by significant natural areas (SNAs). The Proposed Rules are essentially the Officer Draft Rules, but with the SNA designation removed from all residential zoned land.	Supports the Proposed District Plan as notified - with no Significant Natural Areas on residentially zoned land.

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Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Peter Kelly	16.3	Amend	<p>Councillors have a democratic mandate to balance the interests of WCC residents against the important natural environment values represented by significant natural areas (SNAs). The Proposed Rules are essentially the Officer Draft Rules, but with the SNA designation removed from all residential zoned land.</p> <p>Requests that if SNAs are returned to residentially zoned land, the provisions in the draft District Plan are reinstated and fine-tuned.</p>	<p>If the Proposed District Plan is amended to allow Significant Natural Areas on residentially zoned land:</p> <p>Seeks that changes are made to ECO (Ecosystems and Indigenous Biodiversity) to give effect to the following provision:</p> <p>Add an amended Draft District Plan ECO-R4:</p> <p>i. Be held in a freehold title that existed at <del>18 July 2022</del> 1 July 2027</p>
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Barry Insull	32.1	Amend	<p>Considers that the PDP does not identify why shingle beaches are endangered.</p> <p>At several points it is recorded that shingle beaches are endangered e.g. site 122 (Tounge Point). Given numerous shingle beaches exist between Owhiro Bay and Makara perhaps it would be helpful to explain both why such a designation exists and set out what mitigation/enhancement measures are being undertaken and by whom.</p>	Clarify the endangered status of shingle beaches.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Barry Insull	32.2	Amend	<p>Considers that the PDP does not identify what mitigation/enhancement measures are being undertaken to protect shingle beaches.</p> <p>At several points it is recorded that shingle beaches are endangered e.g. site 122 (Tounge Point). Given numerous shingle beaches exist between Owhiro Bay and Makara perhaps it would be helpful to explain both why such a designation exists and set out what mitigation/enhancement measures are being undertaken and by whom.</p>	Seeks that the PDP make mention of what mitigation and enhancement measures to protect shingle beaches are being undertaken.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Barry Insull	32.3	Amend	<p>Considers that the PDP does not identify who is undertaking mitigation/enhancement measures to protect shingle beaches.</p> <p>At several points it is recorded that shingle beaches are endangered e.g. site 122 (Tounge Point). Given numerous shingle beaches exist between Owhiro Bay and Makara perhaps it would be helpful to explain both why such a designation exists and set out what mitigation/enhancement measures are being undertaken and by whom.</p>	Seeks that the PDP make mention of who is undertaking mitigation and enhancement measures to protect shingle beaches.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Hugh Good	90.3	Not specified	Not opposed to attempts to reinstate Significant Natural Areas on private land.	Not Specified
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Capital Kiwi Trust Board	91.1	Amend	<p>Considers that there is a level of concern across landowners in the Capital Kiwi project area around the potential for SNAs to be declared over their properties in the future should kiwi either be released onto their land or be ranging onto them.</p> <p>In particular, concern is around any potential to unreasonably limit, restrict or prevent operations or developments on their land.</p> <p>Considers that the Capital Kiwi project would not be possible without the trust and support of a wide range of rural private landowners.</p> <p>Considers that based discussions with the Minister of Conservation, and officials in DOC (Director General and Head of Policy), GWRC, and WCC, each party makes it clear that the declaration of SNAs on private land as the result of having North Island brown kiwi on their land is not a possible outcome.</p> <p>[Refer to submission for full reasons].</p>	Clarify the intent of the Significant Natural Area policy to provide assurance that Significant Natural Areas will not, and cannot, be created through native bird species being released onto, or visiting landowners' properties as a result of their commitment to predator control.

# Natural and Environmental Values / Ecosystems and Indigenous Biodiversity

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Oliver Sangster	112.9	Support in part	Generally supports the use of SNA provisions	Retain Significant Natural Area provisions with amendment.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Oliver Sangster	112.10	Not specified	[Inferred reasons] Considers that awareness is needed about SNAs, what they do, their benefits, and how to work appropriately within and around them.	Seeks that the implementation of the Proposed District Plan be coupled with a strong public education campaign about Significant Natural Areas.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Pam Wilson	120.4	Support	Oppose any attempt to reinstate Significant Natural Areas on private land.	Not specified.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Thomas Brent Layton	164.4	Amend	<p>Considers that the WCC should abandon the SNA overlay and instead enter into negotiations. This will focus WCC and the community's mind on what value they place on conserving areas.</p> <p>Considers that If the council thinks that there is a net benefit to society from an SNA it should negotiate with the current owners over the imposition of controls and impose the costs of preservation on all ratepayers. If they don't think the community will bear the costs sought by the landowner, then, clearly, the community (which includes the landowner) will be better off if the land is not subject to an SNA.</p> <p>[Refer to original submission for full reasons].</p>	Adopt a policy of negotiating with current landowners for agreement to preserve significant natural areas.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Helen Grove	197.1	Oppose	Opposes the Council confiscating land rights of private ownership in multiple ways, including SNAs.	Opposes Significant Natural Areas on urban or rural private land.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Boston Real Estate Limited	220.2	Amend	[No specific reason given beyond decision requested - refer to original submission]	Seeks that where 'site specific' assessments are not completed then the status quo of the operative district plan should prevail.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Tyers Stream Group	221.31	Oppose	Opposes exception of residentially zoned land to SNA classification.	Amend the plan to include significant natural areas on privately owned residential land.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Dominic Hurley	260.1	Oppose	<p>Considers that site owners will lose control and value of their land due to SNA's.</p> <p>SNA's on land will drive owners to remove the native bush to avoid SNA status, having the opposite effect.</p> <p>Incentives should be offered instead.</p>	Remove the Ecosystems and Indigenous Biodiversity Chapter from the PDP.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Dominic Hurley	260.2	Oppose	<p>Considers that site owners will lose control and value of their land due to SNA's.</p> <p>SNA's on land will drive owners to remove the native bush to avoid SNA status, having the opposite effect.</p> <p>Incentives should be offered instead.</p>	Seeks that Significant Natural Areas are not applied to residentially zoned private land in the future.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Horokiwi Quarries Ltd	271.21	Amend	<p>Considers that there is a restrictive policy and rule framework that would apply to SNAs (and in particular where the sites are within a Coastal Environment overlay) and wishes to ensure any sites that are identified are in fact warranted as significant areas.</p> <p>Horokiwi does have concerns with particular areas on both its site and on the adjoining land to the west, in terms of whether the biodiversity values merit the specific areas being identified as SNAs. Based on the independent ecological assessment, Horokiwi seeks amendment to the SNA area identified. [Refer to original submission for full reason, including attachments]</p>	<p>Seeks that the Significant Natural Area overlay be amended as it relates to the Horokiwi quarry site including to remove the SNA from the Horokiwi site which is subject to the existing use certificate reference 1048648.</p> <p>[Refer to original submission, including figure and attachments]</p>

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Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Jane Hurley	286.1	Oppose	Opposes significant natural area controls, but if are included on residential land considers that the Council should at the market price, and that that compensation should be determined at the point at which owners wish to sell their property, so that it reflects the actual market loss suffered at that point.  [Refer to original submission for full reason]	Seeks that compensation be provided to private landowners should residential zoned sites have significant natural area controls applied.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Tawa Community Board	294.10	Support	Supports the protection of our ecology on public land by the use of the Significant Natural Area (SNA).  Considers that SNA's on private land may leave some property owners with unusable land, leading to financial hardship.	Retain ECO Chapter as notified (with regards to Significant Natural Areas).
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Tawa Community Board	294.11	Not specified	Considers that SNA's on private land may leave some property owners with unusable land, leading to financial hardship.	Not specified.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Roland Sapsford	305.29	Amend	Considers that Aro Valley's vegetation should be considered natural heritage. Aro Valley is recognised for the significant presence of vegetation within its urban fabric, along with its built environment.  Significant Natural Areas are not the only tool at the Council's disposition. Creative use can be made of design controls which recognise the value of green space and enable design conversations about its retention.	Seeks that Aro Valley's vegetation be considered natural heritage and make creative use of planning tools to protect it.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Wilma Sherwin	306.4	Support	Opposes any attempts to re-instate Significant Natural Areas (SNA's) on private land.	Supports that Significant Natural Areas do not apply to private urban land. [Inferred decision requested]
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Wilma Sherwin	306.5	Support	Opposes any attempts to re-instate Significant Natural Areas (SNA's) on private land.	Supports that Significant Natural Areas do not apply to private rural land. [Inferred decision requested]
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Transpower New Zealand Limited	315.162	Support	Supports the introductory text which clarifies that provisions specific to infrastructure are addressed in the infrastructure chapter.	Retain the Introduction to the Ecosystems and Indigenous Biodiversity chapter as notified.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Bruce Crothers	319.9	Not specified	Considers that support for revegetation of marginal land and restoration of wetlands for biodiversity and carbon sequestration should be continued. No further draining or development on wetland. It is considered that if humans are to survive as a species for more than fifty years, the Council must put in place the means to reduce emissions and ensure carbon sequestration by restoring greenspaces and wetlands, as per the IPCC report.	Seeks that the council put in place the means to reduce emissions and ensure sequestration of carbon by restoring greenspace and wetlands, as per the IPCC report as well as ensuring no further draining or development of, wetlands.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Bruce Crothers	319.10	Oppose	Opposes the draining or development of wetlands.	Not specified.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Bruce Crothers	319.11	Amend	Considers that there should be a ban on the covering of waterways in green fields development.	Seeks a ban on covering waterways in greenfield development
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Bruce Crothers	319.12	Amend	Considers the Queen's chain should be restored, possibly allowing for public walking network and wildlife corridor.	Seeks that the Queen's chain is restored.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Bruce Crothers	319.13	Not specified	Considers that the Council needs to intervene on the noticeable biodiversity collapse by not allow the wholesale destruction of nature on land, in the air and sea, or any destruction of irreplaceable natural assets.	Seeks that Council protect nature on land, in the air and in the sea, as well as any irreplaceable natural assets.

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Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Royal Forest and Bird Protection Society	345.171	Not specified	Generally supports the provisions in this chapter, subject to the submission points below. As discussed above, the SNA provisions applying to residential SNAs must be reinstated from the previous version of the Plan. Reinsert all provisions relating to SNAs in residential zones, from the District Plan draft dated 20 April 2022 (ECO chapter is attached to this submission) with amendments as set out below. This includes any deleted references to residential SNAs or SCHED 9 - Urban Environment Allotments that may have been included in other parts of the Plan. If this is not done, there will need to be an alternative rule or rules to protect significant biodiversity in residential areas, that still meets the requirements of the Act. Insert additional provisions in this chapter and in other relevant chapters to provide for Council's function for the maintenance of indigenous biodiversity, including regulatory methods to restrict vegetation clearance and policy direction for assessments of effects on indigenous biodiversity. Include provisions to promote maintenance, restoration, and enhancement of areas within and beyond SNAs. There appears to be a referencing problem with several of the provisions. The provisions seem to have retained the references to policies prior to the deletion of the residential SNAs. We seek that all references to ECO policies are reviewed to ensure that they are accurate.	Not specified.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Royal Forest and Bird Protection Society	345.172	Support in part	Considers the Introduction is silent on the Council function of maintaining biodiversity, which is wider than only protection SNAs. The purpose of this chapter is to identify significant natural areas within Wellington City to protect and maintain the remaining areas of indigenous biodiversity. In addition to the requirement to identify and protect significant natural areas, Council also has the job of maintaining biodiversity outside of significant natural areas. This chapter contains provisions which support that function.	Amend the Introduction to the Ecosystems and Indigenous Biodiversity chapter:  The purpose of this chapter is to identify significant natural areas within Wellington City to protect and maintain the remaining areas of indigenous biodiversity. <u>In addition to the requirement to identify and protect significant natural areas, Council also has the job of maintaining biodiversity outside of significant natural areas. This chapter contains provisions which support that function.</u>  ... The SNAs that are covered by this chapter are contained in SCHED8 – Significant Natural Areas, <u>SCHED 9 – Urban Environment Allotment, and any area that biodiversity values that meet Policy 23 RPS. Where SNAs are within an urban environment allotment the trees and location are identified in SCHED9 – Urban Environment Allotments to meet the requirements of s76 of the RMA.</u>
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Greater Wellington Regional Council	351.144	Support in part	Supports the identification of SNAs in the PDP in accordance with RPS Policies 23 and 24.	Retain provision, subject to amendments, as outlined other submission points.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Greater Wellington Regional Council	351.145	Oppose	Considers that in managing the effects of intensification on indigenous ecosystems and habitats, we recommend WCC includes additional controls for zones where intensification may occur in areas adjacent to SNAs, such as buffer zones and ecological corridors. Such areas contribute to the long-term viability and enhancement of SNAs. Greater Wellington seeks consideration of these measures in accordance with Policy 47(a) and (b) of the operative RPS.	Seeks to include any necessary consequential amendments to provide this direction.

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Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Greater Wellington Regional Council	351.146	Oppose	<p>Though Greater Wellington supports WCC's identification of SNAs in line with RPS Policy 23, we oppose the omission of SNAs on private residential land from the Proposed District Plan (PDP) because:</p> <ul style="list-style-type: none"> <li>the removal of identified SNAs from the PDP contradictory to national direction for indigenous biodiversity protection. Section 6(c) of the RMA 1991 states that 'the protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna' is a matter of national importance, and that this matter must be 'recognised and provided for' by all persons exercising functions and powers under the RMA, including local authorities under Sections 30 and 31.</li> <li>the removal of SNAs on private residential land from the PDP is contrary to Policy 24 of RPS. Policy 24 directs district councils to include in their district plans policies, rules and methods to protect the indigenous ecosystems and habitats identified in accordance with policy 23. Policy 24 requires district councils to protect all areas identified in accordance with policy 23 through provisions in their district plans.</li> <li>the removal of identified SNAs on private residential land from the PDP to be inconsistent with WCC's vision and aspirations for protecting and restoring the city's indigenous biodiversity. The Our Natural Capital: Wellington's Biodiversity Strategy and Action Plan 2015[1] states that WCC will protect biodiversity by 'focussing on the protection of priority biodiversity sites on public and private land and rare, threatened, or locally significant species', and that it will build natural capital by 'respect[ing] the importance of indigenous biodiversity to New Zealand and its intrinsic right to exist'. We do not consider the exclusion of SNA on private residential land to align with this direction.</li> </ul>	Seeks to apply SNAs to all zones as intended by section 6 of the RMA and Policy 24 of the RPS.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Greater Wellington Regional Council	351.147	Amend	<p>Policy IE.1 of Proposed RPS Change 1 directs district plans include policies, rule or methods to partner with mana whenua to managing indigenous biodiversity values. where offsetting is required, this policy could be implemented by provisions requiring management plans for managing offset biodiversity areas and effects on significant areas. Monitoring requirements would form part of these plans and plan direction could encourage the adoption of mātauranga Māori in monitoring of indigenous species in relevant circumstances. Other relevant Proposed RPS Change 1 policies include Policy 47 and IE.2.</p>	Seeks to Amend the PDP to require partnering with mana whenua in the management of activities that affect indigenous biodiversity. Consider the requirement for management plans for consents and within those management plans a requirement for enabling tangata whenua to exercise kaitiakitanga to monitor biodiversity.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Greater Wellington Regional Council	351.148	Amend	<p>Considers that while mana whenua / tangata whenua exercising their role as kaitiaki have been provided for, we consider the policy requires amendment or a new policy inserted to specifically recognise mana whenua / tangata whenua involvement in the mapping of indigenous biodiversity, including to identify taonga species. This would be to have regard to Proposed RPS Change 1 policies IE.1 and IE.2.</p>	Seeks to amend to provide for mana whenua / tangata whenua involvement in the mapping of indigenous biodiversity, including to identify taonga species.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Greater Wellington Regional Council	351.149	Amend	<p>Considers amendments are required have regard to Policies IE.1 and IE.2 of Proposed RPS Change 1. We consider the adverse effects on mahinga kai, other customary uses and access for these activities needs to be included as an assessment matter for consent applications</p>	Seeks to include a new matter of discretion/control to consider the adverse effects on mahinga kai, other customary uses and access for these activities.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Richard Herbert	360.2	Amend	<p>Supports the retention of SNAs as proposed originally, before the Councillor amendment to remove SNAs from residential zones in June 2022.</p>	Amend Significant Natural Areas to re-instate on Residential Zones, as proposed prior to the Councillor Amendment to remove Significant Natural Areas from Residential Zones in June 2022.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Te Kamaru Station Ltd Ratings	362.4	Amend	<p>Considers that SNAs should not be on private property.</p>	<p>Seeks that Significant Natural Areas be removed Significant Natural Areas on private property in both urban and rural environments.</p> <p>[Inferred decision requested].</p>

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Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	WCC Environmental Reference Group	377.115	Amend	<p>Considers that Schedule 8 should include all the SNAs identified in the draft district plan version provided to the Council's environment committee from officers. "Wellington, wild at heart" is what our unique capital city trades upon - and as the population grows and urban areas densify, preserving and enhancing significant natural areas will become increasingly important. Research shows that access to natural areas, and 'biophilic' environments are keys to human health and well-being and are a critical part of protecting biodiversity.</p> <p>On this matter, Wellington as a city is playing a critical role in providing refuge for formerly at risk native birds, e.g. kaka, and with efforts such as the Halo Project and Predator Free initiatives being undertaken by thousands of Wellingtonians, it is important our city's district plan provides legal and policy support to this. The failure to include SNA areas in residential zones means that the district plan is not in accordance with section 6 of the RMA, nor is it giving effect to relevant provisions of GWRC's regional policy statement and regional plan.</p>	Seeks that Significant Natural Areas to add all the SNA areas in the residential zones recommended by officers in the draft district plan version provided to the Council's environment and planning committee on June 23 2022.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Taranaki Whānui ki te Upoko o te Ika	389.73	Support in part	Supports the general direction of chapter, with amendments.	Retain Natural Character chapter with amendments.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Taranaki Whānui ki te Upoko o te Ika	389.74	Oppose	<p>Opposes the zoning and extent of overlays proposed over Te Motu Kairangi / Miramar Peninsula, Mount Crawford.</p> <p>Submitter supports the protection of areas of significant indigenous vegetation as well as landscapes that have cultural, historical, spiritual and traditional significance to Taranaki Whānui, the identification and protection of environmental overlays in previously developed areas is of concern to Taranaki Whānui.</p> <p>Concerns there is potential for these overlays to significantly restrict future development and opportunities for Taranaki Whānui to exercise tino rangatiratanga over their ancestral lands.</p>	Seeks that the zoning and extent of overlays proposed over Te Motu Kairangi / Miramar Peninsula, Mount Crawford is removed; specifically at Part Lot 1 DP 4741, Section 4 SO 477035, PT LOT 1 DP 4741 - WELLINGTON PRISON, Section 1 SO 477035, Part Section 20 Watts Peninsula DIST.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Taranaki Whānui ki te Upoko o te Ika	389.75	Amend	<p>Opposes the zoning and extent of overlays proposed over Te Motu Kairangi / Miramar Peninsula, Mount Crawford.</p> <p>Submitter supports the protection of areas of significant indigenous vegetation as well as landscapes that have cultural, historical, spiritual and traditional significance to Taranaki Whānui, the identification and protection of environmental overlays in previously developed areas is of concern to Taranaki Whānui.</p> <p>Concerns there is potential for these overlays to significantly restrict future development and opportunities for Taranaki Whānui to exercise tino rangatiratanga over their ancestral lands.</p>	Seeks that any other relief to enable Taranaki Whānui to exercise tino rangatiratanga over their properties in Te Motu Kairangi.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Terawhiti Farming Co Ltd (Terawhiti Station)	411.4	Oppose	SNAs are being arbitrarily being introduced without any consideration to the potential cost to the landowner that this policy will incur	Not specified.

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Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Johnsonville Community Association	429.24	Support	Supports the protection of significant natural areas on public land within Wellington.	Not specified.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Johnsonville Community Association	429.25	Oppose	<p>Considers that unilaterally taking over of private property is a major intrusion on rights of the property owners, and may lead to removal of major natural areas on urban property.</p> <p>Opposes SNA's on private urban or rural land.</p>	Opposes Significant Natural Areas on urban or rural private land.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Paul M Blaschke	435.5	Support	Objectives, Policies and Rules in the Ecosystems and Indigenous Biodiversity section are strongly supported, as they support a critical part of the city's overall vision and strategic objectives and are strongly supported by the overwhelming majority of the city's residents.	Retain the Ecosystems and Indigenous Biodiversity chapter as notified.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Paul M Blaschke	435.6	Amend	<p>Considers that the Council should allow SNAs on residentially zoned properties. The Council should be consistent with its overall policy objectives and let its original decisions on SNAs stand on their merits. The decision from Council's Planning &amp; Environment Committee to remove SNAs from all residentially zoned properties on 23 June 2022 is opposed. This decision renders the Ecosystems and Indigenous Biodiversity section much less effective than it could and should be.</p> <p>It greatly hinders the achievement of Council's Te Atakura blueprint and other moves towards sustainability and resilience.</p> <p>It disadvantages the great majority of the city's residents except for a tiny number of suburban residential landowners who become privileged over all others including other suburban residential landowners with portions of SNAs within their properties and who have welcomed or not objected to the provisions.</p> <p>It overturns the very good process adopted by the council team and consultants who have planned and undertaken the SNA survey and policy development. Finally, it renders ECO-O1, ECO-P1, ECO-P2, and ECO-P3, and the rules supporting these objectives and policies, incapable of being properly implemented, and perpetuates the uncertainty caused by lack of a comprehensive statutory process around significant areas and indigenous biodiversity.</p> <p>[Refer to original submission for full reason]</p>	Seeks to extend Significant Natural Areas to residentially zoned properties.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Paul M Blaschke	435.7	Amend	Considers that the SNA regulatory framework in the Ecosystems and Indigenous Biodiversity section should apply to SNAs on residentially zoned properties.	Seeks that Ecosystems and Indigenous Biodiversity provisions apply to Significant Natural Areas on residentially zoned properties.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Meredith Robertshawe	444.1	Support	Supports the objectives and policies for Significant Natural Areas and support the intent of the provisions in the PDP.	Retain the objectives in the Ecosystems and Indigenous Biodiversity (ECO) chapter as notified.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Meredith Robertshawe	444.2	Support	Supports the objectives and policies for Significant Natural Areas and support the intent of the provisions in the PDP.	<p>Retain the policies in the Ecosystems and Indigenous Biodiversity (ECO) chapter as notified.</p> <p>[Inferred Decision Requested]</p>



# Natural and Environmental Values / Ecosystems and Indigenous Biodiversity

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Meredith Robertshawe	444.3	Support	Supports the objectives and policies for Significant Natural Areas and support the intent of the provisions in the PDP.	Retain the provisions in the Ecosystems and Indigenous Biodiversity (ECO) chapter as notified.  [Inferred Decision Requested]
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Chris Horne, Sunita Singh, Julia Stace, Paul Bell-Butler	456.3	Support in part	Supports the protection of Indigenous Biodiversity and Significant Natural Areas.  [Refer to original submission for full reason]	Retain Significant Natural Area provisions, with amendment.  [Inferred decision requested]
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Chris Horne, Sunita Singh, Julia Stace, Paul Bell-Butler	456.4	Amend	Considers that SNA-status should be restored to all residential-zoned properties. In particular considers that the Planning and Environment Committee vote to remove SNAs from all residential-zoned properties over-rode the purpose of the ECO chapter which " ... is to identify significant natural areas within Wellington City in order to protect and maintain the remaining areas of indigenous biodiversity".	Amend mapping of Significant Natural Areas to include all residential-zoned properties.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Chris Horne, Sunita Singh, Julia Stace, Paul Bell-Butler	456.5	Amend	Considers that there should be monitoring compliance by all owners of Significant Natural Areas with Council's objective of protecting those SNAs' indigenous ecosystems in perpetuity.	Seeks that a monitoring programme for Significant Natural Areas is established.  [Inferred decision requested]
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Grant and Marilyn Griffiths, Griffiths Family Trust	460.2	Oppose in part	Opposes Significant Natural Areas on Private land.	Retain Significant Natural Area provisions with amendment below.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Te Rūnanga o Toa Rangatira	488.48	Oppose	Opposes that significant natural areas provisions do not apply to residential zoned land.	Seeks that Significant Natural Area provisions are applied to all zones.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / New ECO	Royal Forest and Bird Protection Society	345.173	Amend	Protection of SNAs and encouragement of restoration by community groups etc is not enough to fulfil the Council's obligation to maintain biodiversity under s31(1)(b)(iii). As such, we seek a new objective. The S32 report briefly touches on this issue, in the context of potential vegetation clearance rules outside SNAs (pg 41). It refers to the RPS approach of suggesting non-regulatory methods outside of SNAs. The report also mentions that additional controls on non-SNA indigenous vegetation are included in the overlay chapters for Outstanding Natural Features, Outstanding Natural Landscapes, Special Amenity Landscapes and the Coastal Environment. However, these additional controls are not for the purpose of biodiversity maintenance, and do not refer back to any policy which would allow consideration of this Council function. The rules in the Coastal Environment chapter for example, only consider natural character effects and policies. We seek that additional provisions (an objective, policy and rules) are included in the ECO chapter for the maintenance of biodiversity outside of SNAs. We also seek that the vegetation clearance controls in other chapters refer back to the ECO policy for maintenance of biodiversity. It is not clear what non-regulatory methods have been included in the plan to fulfil this function. In any case, given the biodiversity crisis, non-regulatory measures are not sufficient to meet S31.	Add a new objective to the Ecosystems and Indigenous Biodiversity chapter:  <u>ECO-OX</u> <u>The District's indigenous biodiversity is maintained and enhanced.</u>

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / New ECO	Royal Forest and Bird Protection Society	345.174	Amend	<p>Considers it is not clear that the plan adequately provides for the protection of wetlands. In relation to wetlands, the Council has responsibilities in terms of integrated management and the maintenance of biodiversity. This includes responsibilities under the RMA and NPSFM. RPS Policy 61 allocates responsibility for various matters as between district and regional council. It is not clear that the GWRC has sole responsibility for works in wetlands and their margins. Policy 61 provides:</p> <p>Policy 61: Allocation of responsibilities for land use controls for indigenous biodiversity Regional and district plans shall recognise and provide for the responsibilities below, when developing objectives, policies and methods, including rules, to maintain indigenous biodiversity:</p> <ul style="list-style-type: none"> <li>- Wellington Regional Council shall be responsible for developing objectives, policies, and methods in the regional policy statement for the control of the use of land to maintain indigenous biological diversity;</li> <li>- Wellington Regional Council shall be responsible for developing objectives, policies, rules and/or methods in regional plans for the control of the use of land to maintain and enhance ecosystems in water bodies and coastal water. This includes land within the coastal marine area, wetlands and the beds of lakes and rivers; and</li> <li>- city and district councils shall be responsible for developing objectives, policies, rules and/or methods in district plans for the control of the use of land for the maintenance of indigenous biological diversity. This excludes land within the coastal marine area and the beds of lakes and rivers.</li> </ul> <p>GWRC is clearly responsible for controlling the use of land within wetlands to maintain and enhance ecosystems in water bodies (paragraph (b)). However, according to paragraph (c), this Council retains responsibility for controlling the use of land for the maintenance of indigenous biodiversity. Neither wetlands, nor their margins, are excluded from that responsibility. Policy 23 echoes that concept. The explanation to the policy states: Regional plans will identify indigenous ecosystems and habitats with significant biodiversity values in the coastal marine area, wetlands and the beds of lakes and rivers. District plans will identify indigenous ecosystems and habitats with significant biodiversity values for all land, except the coastal marine area and the beds of lakes and rivers. Again, Council's responsibility under s31 still applies to wetlands. The regional plan states: "Also refer to the relevant district plan for provisions that apply to activities within or adjacent to wetlands." As such, we seek objectives, policies and rules protecting wetlands and their margins, as far as is possible within Council's responsibilities under the RAM and NPSFM. These provisions may need to be located throughout the plan, for example in the earthworks chapter.</p>	Add new suite of objectives, policies, and rules to provide for protection of wetlands.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / New ECO	Royal Forest and Bird Protection Society	345.175	Amend	Considers the plan should include a policy aimed at identification of SNAs. This is important for where new SNAs are identified, for example as part of consenting processes.	<p>Add new policy ECO-PX <u>Identification of Significant Natural Areas</u>:</p> <p><u>Identify all areas with significant indigenous biodiversity values and list within SCHED8 and SCHED9, and provide for identification of additional areas with significant biodiversity values.</u></p>

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / New ECO	Royal Forest and Bird Protection Society	345.176	Amend	Considers the Plan does not give effect to the Council’s obligation to maintain indigenous biodiversity. Considers support for restoration is not sufficient (by way of ECO P4), and therefore seeks a new policy be added. Also seeks that the relevant rules and their matters of discretion in this and other chapters refer back to this new policy.	Add new policy ECO-PX ( <u>Maintaining Indigenous Biodiversity</u> ):  <ol style="list-style-type: none"> <li>1. <u>To maintain indigenous biodiversity outside of SNAs by avoiding, remedying or mitigating the adverse effects of subdivision, land use and development on indigenous biodiversity.</u></li> <li>2. <u>To have regard to the following potential adverse effects in considering subdivision, land use and development that may adversely affect indigenous ecosystems and habitats with indigenous biodiversity values:</u> <ol style="list-style-type: none"> <li>a. <u>Fragmentation of, or reduction in the extent of, indigenous vegetation or habitats of indigenous fauna;</u></li> <li>b. <u>Fragmentation or disruption of connections and linkages between ecosystems or habitats of indigenous fauna;</u></li> <li>c. <u>Loss of, or damage to, buffering of ecosystems or habitats of indigenous fauna; and</u></li> <li>d. <u>Loss or reduction of rare or threatened indigenous species’ populations or habitats.</u></li> </ol> </li> </ol>
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / New ECO	Royal Forest and Bird Protection Society	345.177	Amend	Considers including a policy to deal with the development of existing vacant lots, as was included in the plan version as at 20 April 2022 (attached to this submission), which provided parameters around developing in existing vacant residential sites established prior to the notification of the DP where there is no suitable building platform available outside the SNA. Notes the date would need to be amended to reflect that the SNAs were not included at notification. We would support more protective parameters than those above, to ensure the SNA was protected to the greatest extent possible.	Add new policy ECO-PX ( <u>Development of Existing Vacant Lots</u> ):  <u>Provide for the development of existing vacant residential site established prior to the notification of the District Plan where there is no suitable building platform available outside of a Significant Natural Area identified in SCHED8 and SCHED9, having regard to:</u> <ol style="list-style-type: none"> <li>1. <u>The location of the building platform and minimizing the extent of associated vegetation removal</u></li> <li>2. <u>The location of the access or driveway to the building platform to minimize the loss of vegetation or fragmentation of the Significant Natural Area; and</u></li> <li>3. <u>The location of lateral service connections to public wastewater, sewer and water supply network, electricity and telephone cables.</u></li> </ol>
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / New ECO	Royal Forest and Bird Protection Society	345.178	Amend	Seeks additional rules to manage vegetation clearance outside SNAs. Considers the plan’s provisions do not fulfil Council’s requirement to maintain indigenous biodiversity. Regulating activities only in SNAs falls short of this function.  This rule would limit permitted indigenous vegetation removal to 200m2 in any 10 year period. Where this PA was not met, it would become RDA, and the matters of discretion would need to reference the new policy aimed at the maintenance of biodiversity. This rule is particularly important given the deletion of the residential SNAs.	Add new rule ECO-RX to manage vegetation clearance outside Significant Natural Areas that permit indigenous vegetation removal to 200m2 in any 10 year period. Where the Permitted activity status is not met, the activity would become a Restricted Discretionary activity, and the matters of discretion would need to reference the new policy aimed at the maintenance of biodiversity.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / New ECO	Royal Forest and Bird Protection Society	345.179	Amend	Notes that there is a vegetation clearance rule in the Coastal Environment chapter, which currently only applies in high natural character areas and outside SNAs. As submitted in the Coastal Environment chapter, the vegetation clearance rules should apply everywhere outside SNAs in the coastal environment, not only in high natural character areas, where CES1 is met.  We seek a rule that would also have effect outside the coastal environment. Trimming or removal of indigenous vegetation outside SNAs would be permitted if: <ul style="list-style-type: none"> <li>- to address an imminent threat to people or property provided that a standard is complied with,</li> <li>- for the operation or maintenance of lawfully established buildings, infrastructure, walking cycling or private vehicle access or fences or existing farming activities; and the removal does not exceed 200m2 per title as at notification. A new RDA would apply if those standards were not met.</li> </ul>	Add new rule ECO-RX to manage vegetation clearance in all areas of the coastal environment.

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / New ECO	Royal Forest and Bird Protection Society	345.180	Amend	We seek a rule that would also have effect outside the coastal environment. Trimming or removal of indigenous vegetation outside SNAs would be permitted if: - to address an imminent threat to people or property provided that a standard is complied with, - for the operation or maintenance of lawfully established buildings, infrastructure, walking cycling or private vehicle access or fences or existing farming activities; and the removal does not exceed 200m2 per title as at notification. A new RDA would apply if those standards were not met.	Add new rule ECO-RX to manage vegetation clearance outside Significant Natural Areas, with Permitted activity standards requiring the activity to: - address an imminent threat to people or property provided that a standard is complied with, - before the operation or maintenance of lawfully established buildings, infrastructure, walking cycling or private vehicle access or fences or existing farming activities; and the removal does not exceed 200m2 per title as at notification. Non-compliance with Permitted activity standards would default to a Restricted Discretionary activity.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / New ECO	Royal Forest and Bird Protection Society	345.181	Amend	Considers that it is appropriate to include standards for residential SNA's in line with those in the Draft Plan.	Reinstate the Draft Plan's ECO standards for residential Significant Natural Areas.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / New ECO	Royal Forest and Bird Protection Society	345.182	Support in part	It is not clear how these policies are given effect to in the rules. Seeking (in the ECO chapter) a general indigenous vegetation clearance rule, outside of SNAs. Seek that this is applied in the rural zone, in order to maintain biodiversity.	Add new rule ECO-RX to manage indigenous vegetation clearance outside of Significant Natural Areas to maintain biodiversity.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / New ECO	Greater Wellington Regional Council	351.150	Oppose	Considers that WCC has stated that wetlands are sufficiently covered by the National Environmental Standards for Freshwater 2020, the submitter does not support this view and considers that the PDP has a role for integrated management of adverse effects on wetlands and their functions, including those wetlands not yet identified, under NPS-FM Clause 3.5.  Under NPS-FM Section 3.5 the PDP should contribute to the protection and enhancement of the health and well-being of water bodies and freshwater ecosystems, including wetlands, through WCC's RMA section 31 functions, as outlined in Policies FW.3 and FW.6 of Proposed RPS Change 1. This approach would help to achieve NPS-FM Policies 6 and 7 and operative RPS policy 47.  The PDP should provide for identification and avoidance of waterways (both within and outside of SNAs) during structure planning and sub-division, such that waterways must be identified and protected prior to any development occurring. Greater Wellington does not consider the freshwater direction in the design guides to provide sufficient certainty of protection and enhancement.	Add a policy and objective to protect and enhance the health and well-being of water bodies and freshwater ecosystems, including wetlands, in the ECO chapter. This should lead into rules in the subdivision and future urban zone chapters, requiring that waterways and wetlands have been identified for structure planning or subdivision prior to any development occurring.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / New ECO	Director-General of Conservation	385.35	Not specified	Considers that Policy 8 of the NPS-IB exposure draft seeks that "The importance of maintaining indigenous biodiversity outside SNAs is recognised and provided for".  Given the NPS-IB is anticipated to be gazetted in December 2022, the Director-General submits that the Proposed District Plan should give effect to this national direction.	Add policy to require the protection of indigenous biodiversity outside of SNAs.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / New ECO	Director-General of Conservation	385.36	Amend	Considers addition of setback standard within the chapter.  Under the current standards, there is no setback requirement from a Significant Natural Area (SNA) which means development could be located directly against the boundary of a SNA. Adverse effects resulting from development within proximity to an SNA include bright lights impacting indigenous fauna and people trimming/removing vegetation/trees from an SNA for being too close to their property. The provision of a buffer or setback between new development and SNAs will reduce the possibility of adverse effects and allow the consideration of effects/mitigation at resource consent stage if new development is proposed within the setback.  Additionally, the addition of a development setback for SNAs would ensure the Proposed District Plan is in line with Policy 47, specifically point b, of the RPS.	Add standard which would manage development setbacks as follows: New buildings, building additions, structures, and swimming pools shall be setback 5m from the boundary of a Significant Natural Area.

# Natural and Environmental Values / Ecosystems and Indigenous Biodiversity

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-01	Tyers Stream Group	221.32	Amend	[No specific reason given beyond decision requested - refer to original submission]	Amend ECO-01 (Significant Natural Areas are protected from inappropriate subdivision, use and development and where appropriate, restored) as follows:  Significant Natural Areas are protected from <del>inappropriate</del> subdivision, use and development and where appropriate, restored.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-01	Meridian Energy Limited	228.68	Support in part	Considers that it is the values of Significant Natural Areas that should be protected, not the geographic areas they occupy.	Retain Objective ECO-01 (Significant natural areas are protected from inappropriate subdivision, use and development, and where appropriate, restored) with amendment.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-01	Meridian Energy Limited	228.69	Amend	Considers that it is the values of Significant Natural Areas that should be protected, not the geographic areas they occupy.	Amend Objective ECO-01 (Significant natural areas are protected from inappropriate subdivision, use and development, and where appropriate, restored) as follows:  The ecological and indigenous biodiversity values of Significant Natural Areas are protected from inappropriate subdivision, use and development and where appropriate, restored.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-01	Kilmarston Developments Limited and Kilmarston Properties Limited	290.34	Support in part	Considers that It is important that Council identified SNAs within the City in order to protect and maintain the remaining areas of indigenous biodiversity.  However, this should not include areas earmarked for public access and roads. The Submitter accepts the overlay being clipped to the proposed MRZ areas of their land, but not over the paper road and parts of the access.	Retain ECO-01 (Significant Natural Areas are protected from inappropriate subdivision, use and development and where appropriate, restored) as notified.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-01	Royal Forest and Bird Protection Society	345.183	Support in part	Notes that Section 6(c) does not include reference to 'inappropriate subdivision, use and development'.	Amend ECO-01 as follows:  Significant Natural Areas are protected from <del>inappropriate subdivision, use and development and where appropriate, restored.</del>
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-01	WCC Environmental Reference Group	377.116	Amend	Considers that it is crucial that SNAs are protected, as is required by law. By rephrasing this objective, it puts the emphasis on restoration as the default position, rather than a possible option. It is thought that this strikes the balance better between use and protection	Amend the wording "where appropriate) from ECO-01 (Significant Natural Areas are protected from inappropriate subdivision, use...) to "where possible"
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-01	Director-General of Conservation	385.37	Oppose in part	Considers that as the objectives (ECO-01 and ECO-02) are seeking the same outcome, they should be incorporated into one objective.	Opposes ECO-01 in its current form and seeks amendment.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-01	Director-General of Conservation	385.38	Amend	The Director-General is supportive of the intention of Objective ECO-01 & ECO-02, however considers that as the objectives are seeking the same outcome, they should be incorporated into one objective.  The suggested wording is in line with the NZCPS including Policy 7 which provides protection from inappropriate subdivision, use, and development in these areas through objectives and Policy 14 which promotes restoration or rehabilitation of the natural character of the coastal environment.	Amend Objective ECO-01 as follows:  "Significant Natural Areas ( <u>including those within the coastal environment</u> ) are protected from inappropriate subdivision, use and development and where appropriate, restored <u>or rehabilitated.</u> "
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-01	Te Rūnanga o Toa Rangatira	488.49	Support in part	Supports that the objective says that significant natural areas are protected from innappropriate land use	Retain ECO-01 (Significant Natural Areas are protected from inappropriate subdivision, use and development and where appropriate, restored) with amendment below.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-01	Te Rūnanga o Toa Rangatira	488.50	Amend	Considers the objective should mention protection from adverse effects of incompatible activities.	Amend Ecosystems and Indigenous Biodiversity Objective 1 (Protection of significant natural areas) to mention protection from adverse effects of incompatible activities.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-02	Victoria University of Wellington Students' Association	123.39	Not specified	Considers that ECO-02 (Significant Natural Areas within the coastal environment are protected.) supports the restriction of building activities around the coast.  Section 6(a) of the RMA identifies the protection of the natural character of the coastal environment from inappropriate subdivision, use, and development as a matter of national importance.	Seeks that building activities around the coast are restricted to protect biodiversity, natural character, and amenity values.

# Natural and Environmental Values / Ecosystems and Indigenous Biodiversity

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-02	Victoria University of Wellington Students' Association	123.40	Support	Considers that ECO-02 (Significant Natural Areas within the coastal environment are protected.) supports the restriction of building activities around the coast.	Seeks that building activities around the coast, and any expansion of the city including airport runway extensions, acknowledge the large range of indigenous birds nesting around the Pōneke Wellington coastline.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-02	Tyers Stream Group	221.33	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain ECO-02 (Significant Natural Areas within the coastal environment are protected) as notified.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-02	Meridian Energy Limited	228.70	Support in part	Considers that it is the values of Significant Natural Areas that should be protected, not the geographic areas they occupy.	Retain Objective ECO-02 (Significant natural areas within the coastal environment) with amendment.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-02	Meridian Energy Limited	228.71	Amend	Considers that it is the values of Significant Natural Areas that should be protected, not the geographic areas they occupy.	Amend Objective ECO-02 (Significant natural areas within the coastal environment) as follows:  The ecological and indigenous biodiversity values of Significant Natural Areas within the coastal environment are protected.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-02	Kilmarston Developments Limited and Kilmarston Properties Limited	290.35	Support in part	Considers that It is important that Council identified SNAs within the City in order to protect and maintain the remaining areas of indigenous biodiversity.  However, this should not include areas earmarked for public access and roads. The Submitter accepts the overlay being clipped to the proposed MRZ areas of their land, but not over the paper road and parts of the access.	Retain ECO-02 (Significant Natural Areas within the coastal environment are protected) as notified.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-02	Royal Forest and Bird Protection Society	345.184	Support	Generally supports ECO-02.	Retain ECO-02 as notified.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-02	Greater Wellington Regional Council	351.151	Amend	Considers that the wording used for the coastal environment should differ from that in	Seeks to amend wording to 'protected and, where appropriate, restored' or remove the objective.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-02	WCC Environmental Reference Group	377.117	Support	ECO-02 is supported as it is vital to ensuring SNAs are protected.	Retain ECO-02 (Significant Natural Areas within the coastal environment are protected). As notified.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-02	Director-General of Conservation	385.39	Oppose in part	Considers that as the objectives (ECO-01 and ECO-02) are seeking the same outcome, they should be incorporated into one objective.	Delete objective ECO-02 in its entirety, on the grounds that ECO-01 is amended.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-03	Tyers Stream Group	221.34	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain ECO-03 (Significant Natural Areas are protected from the adverse effects of plantation forestry activities) as notified.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-03	Kilmarston Developments Limited and Kilmarston Properties Limited	290.36	Support in part	Considers that It is important that Council identified SNAs within the City in order to protect and maintain the remaining areas of indigenous biodiversity.  However, this should not include areas earmarked for public access and roads. The Submitter accepts the overlay being clipped to the proposed MRZ areas of their land, but not over the paper road and parts of the access.	Retain ECO-03 (Significant Natural Areas are protected from the adverse effects of plantation forestry activities) as notified.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-03	Royal Forest and Bird Protection Society	345.185	Support	Generally supports ECO-03.	Retain ECO-03 as notified.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-03	WCC Environmental Reference Group	377.118	Support	ECO-03 is supported as it is vital to ensuring SNAs are protected.	Retain ECO-03 (Significant Natural Areas are protected from the adverse effects of plantation forestry activities) as notified.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-03	Te Rūnanga o Toa Rangatira	488.51	Support in part	Supports mention of protection from the effects of plantation forestry.	Retain ECO-03 (Significant Natural Areas are protected from the adverse effects of plantation forestry activities.) as notified.

# Natural and Environmental Values / Ecosystems and Indigenous Biodiversity

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-04	Tyers Stream Group	221.35	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain ECO-04 (Significant Natural Areas are maintained or restored by mana whenua in accordance with kaitiakitanga) as notified.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-04	Kilmarston Developments Limited and Kilmarston Properties Limited	290.37	Support in part	Considers that It is important that Council identified SNAs within the City in order to protect and maintain the remaining areas of indigenous biodiversity.  However, this should not include areas earmarked for public access and roads. The Submitter accepts the overlay being clipped to the proposed MRZ areas of their land, but not over the paper road and parts of the access.	Retain ECO-04 (Significant Natural Areas are maintained or restored by mana whenua in accordance with kaitiakitanga) as notified.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-04	Royal Forest and Bird Protection Society	345.186	Support	Generally supports ECO-04.	Retain ECO-04 as notified.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-04	Greater Wellington Regional Council	351.152	Amend	Considers that the wording, 'maintain and restore' is inconsistent with 'protect and restore' in ECO-01 and the related policy ECO-P4.	Seeks to amend wording in ECO-04 to 'protect and restore'.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-04	WCC Environmental Reference Group	377.119	Support	Supports as the objective is vital to ensuring SNAs are protected. Particularly supports ECO-R4 (Significant Natural Areas are maintained or restored by mana whenua in accordance with kaitiakitanga) as it further Wellington City Council's Te Tiriti obligations.	Retain ECO-R4 (Significant Natural Areas are maintained or restored by mana whenua in accordance with kaitiakitanga) as notified.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P1	Tyers Stream Group	221.36	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain ECO-P1 (Protection of significant natural areas) as notified.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P1	Meridian Energy Limited	228.72	Oppose in part	Considers that the mitigation hierarchy created by Policy ECO-P1 (Protection of significant natural areas) should focus biodiversity and compensation initiatives at adverse effects that are more than minor (not all residual adverse effects).  Considers the word 'only' in clauses 4 and 5 is unnecessary because the circumstances when biodiversity offsetting and biodiversity compensation will be considered are set out in APP2 (Biodiversity offsetting) and APP3 (Biodiversity compensation). Considers the word 'only' adds no value to the principles in APP2 and APP3.	Retain Policy ECO-P1 (Protection of significant natural areas) with amendment.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P1	Meridian Energy Limited	228.73	Amend	Considers that the mitigation hierarchy created by Policy ECO-P1 (Protection of significant natural areas) should focus biodiversity and compensation initiatives at adverse effects that are more than minor (not all residual adverse effects).  Considers the word 'only' in clauses 4 and 5 is unnecessary because the circumstances when biodiversity offsetting and biodiversity compensation will be considered are set out in APP2 (Biodiversity offsetting) and APP3 (Biodiversity compensation). Considers the word 'only' adds no value to the principles in APP2 and APP3.	Amend Policy ECO-P1 (Protection of significant natural areas) as follows:  Protect the biodiversity values of the identified significant natural areas within SCHED8 by requiring subdivision, use and development to:  1. Avoid adverse effects on indigenous biodiversity values where practicable; 2. Minimise adverse effects on the biodiversity values where avoidance is not practicable; 3. <u>Where practicable, remedy</u> adverse effects on the biodiversity values where they cannot be avoided or minimised; 4. <u>Where residual adverse effects cannot be avoided, mitigated or remedied, Only</u> consider biodiversity offsetting <del>for any residual adverse effects that are more than minor cannot otherwise be avoided, minimised or remedied and</del> where the principles of APP2 – Biodiversity Offsetting are met; and 5. <u>Only if biodiversity offsetting of more than minor residual adverse effects is not practicable,</u> consider biodiversity compensation <del>after first considering biodiversity offsetting and</del> where the principles of APP3 – Biodiversity Compensation are met.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P1	Horokiwi Quarries Ltd	271.22	Support	Supports ECO-P1 as it reflects the common mitigation hierarchy approach to biodiversity. Depending on the identification of specific SNA areas, Horokiwi is not opposed to the policy.  The references to 'where practicable' and ability for offsetting are supported.	Retain ECO-P1 (Protection of significant natural areas) as notified.

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P1	Aggregate and Quarry Association	303.14	Support	ECO-P1 is supported as it provides for an effects management hierarchy for land development, including offsetting and compensation, within Significant Natural Areas.	Retain ECO-P1 (Protection of significant natural areas) as notified.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P1	Transpower New Zealand Limited	315.163	Support	<p>Considers policy INF-ECO-P36 and P37 requires application of the effects management hierarchy (which is incorrectly referenced as ECO-P2 within the aforementioned policies) to the upgrade and development of the National Grid. Submitter notes that in its comments on INF-ECO-P36 and P37 deletion of the cross reference to Policy ECO-P1 is sought.</p> <p>Submitter is not opposed to ECO-P1 (and is supportive of the mitigation hierarchy approach within ECO-P1 on the basis biodiversity offsets and compensation are only a consideration as opposed to a mandatory requirement). However, given the uncertainty as to what form ECO-P1 will take and the significant implications of any policy changes to policy ECO-P1 to the National Grid, Transpower seeks to include Significant Natural Areas within the 'seek to avoid' policy directive of the sought National Grid specific policies, as opposed to being subject to ECO-P1. By deleting the ECO specific clause within INF-ECO-P36 and P37, the policy directive would be to 'seek to avoid' the SNA's as applying to the National Grid. Considers this would be the most efficient and effective solution in respect of the NPS-ET. While NPS-ET Policy 8 does not specifically reference indigenous biodiversity, given the high value of the areas within the policy, considers it would be consistent to include SNA's within the sought "seek to avoid" policy directive. Considers the inclusion would be consistent for the intent of the NPS-ET to provide a comprehensive enabling regime for the National Grid recognising its national significance, and for the 'seek to avoid' policy to address RMA section 6 matters in a consistent manner. Considers policies 1-5 of the NPS-ET require some tempering of plan provisions that may otherwise be applied to the National Grid, in order to provide for the need to operate, maintain, develop and upgrade the electricity transmission network as a matter of national significance.</p>	Retain Policy ECO-P1 (Protection of significant natural areas) as notified, subject to deletion of reference to the policy within INF-ECO-P36 and INF-ECO-P37.



Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P1	Royal Forest and Bird Protection Society	345.187	Support	<p>Considers this policy needs to be limited to situations where policy 11 NZCPS does not apply. The Auckland Unitary Plan provides an example of how this can be achieved. It is currently not clear that ECO-P5 would apply as a first step in the coastal environment. As such, a specific clause is required.</p> <p>The SNA provisions should apply to any area of significant biodiversity that meets the Policy 23 RPS criteria. There may be areas that have been missed in the scheduling process, and could be discovered for example via the consenting process. In order to meet the requirements of the Act, the SNA provisions must also apply to these areas. The SNA provisions also need to apply to the deleted SCHED9 areas. This can be achieved by either:</p> <ul style="list-style-type: none"> <li>- Amending the SNA definition as sought above to incorporate SCHED 8, SCHED9, and any other area that meets the Policy 23 RPS criteria, and simply referring to the defined term in the provisions (as opposed to the current approach, which specifically references SCHED8 repeatedly) (preferred option); or</li> <li>- Amending every provision in the Plan that refers to SCHED8, to also refer to SCHED9 and any area that meets Policy 23 RPS criteria.</li> </ul> <p>The effects management hierarchy in ECO-P1 only requires for avoidance of effects where practicable. That low standard is not sufficient to ensure the requirements of the Act (including s6 and s31) are met. Some effects must actually be avoided in order to meet these requirements. We seek changes to meet these requirements. We note that the recent PC18 to the Porirua DP includes such limits.</p> <p>We note that this policy applies to subdivision. Please see our submission points on the Subdivision chapter.</p> <p>The effects management hierarchy in this policy uses the term “minimised” rather than the RMA term “mitigated”. The term mitigation comes directly from s 5 RMA. There is extensive jurisprudence on what it means and how it sits within the RMA’s system alongside avoidance and remediation for managing adverse effects of activities. Conversely, the term “minimise” is not in s 5 RMA. This raises a question of the vires of substituting mitigate for minimise.</p> <p>Continued use of mitigate, alongside avoidance and remediation, will preserve case law and knowledge as to their meaning. The term ‘minimise’ or minimisation of effects refers to what effects management should achieve, rather than being an effects management step itself.</p> <p>We do not support providing for compensation, as it is not an effective tool to adequately manage adverse effects on indigenous biodiversity. Forest &amp; Bird’s primary position is that biodiversity compensation should not be part of the effects management hierarchy, because it is inherently uncertain as to whether it will maintain indigenous biodiversity. This is particularly the case where the policy itself does not include any effects which must be avoided (only avoided where practicable).</p> <p>Support the mandatory requirements in 4 and 5 that the offsetting and compensation (if compensation is to be retained) principles must be met for an offsetting/compensation proposal to meet the policy.</p>	<p>Amend ECO-P1 (Protection of significant natural areas):</p> <p>Protect the biodiversity values of the identified significant natural areas within SCHED8 by requiring subdivision, use and development to:</p> <ol style="list-style-type: none"> <li>1. Avoid adverse effects on indigenous biodiversity in the coastal environment to the extent stated in ECO P5;</li> <li>2. Avoid the following adverse effects on indigenous biodiversity values: <ol style="list-style-type: none"> <li>a. Loss of ecosystem representation and extent;</li> <li>b. Disruption to sequences, mosaics or ecosystem function;</li> <li>c. Fragmentation or loss of buffering or connectivity within the SNA and between other indigenous habitats and ecosystems; and</li> <li>d. A reduction in population size or occupancy of threatened species using the SNA for any part of their life cycle.</li> </ol> </li> <li>3. Avoid other adverse effects on indigenous biodiversity values where practicable</li> <li>4. Minimise Mitigate adverse effects on the biodiversity values where avoidance is not practicable;</li> <li>5. Remedy adverse effects on the biodiversity values where they cannot be avoided or mitigated minimised;</li> <li>6. Only consider biodiversity offsetting for any residual adverse effects that cannot otherwise be avoided, mitigated minimised or remedied and where the principles of APP2 – Biodiversity Offsetting are met; and</li> <li>7. Only consider biodiversity compensation after first considering biodiversity offsetting and where the principles of APP3 – Biodiversity Compensation are met.</li> </ol>
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P1	Greater Wellington Regional Council	351.153	Amend	The wording ‘where practicable’ is unnecessary in clause 1 as it is restated in clause 2.	Seeks to amend wording to remove ‘where practicable’ from clause 1.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P1	WCC Environmental Reference Group	377.120	Amend	In relation to Point 3, the submitter considers that environmental damage cannot be remedied in a way that is different to biodiversity offsetting.	Amend Point 3 of ECO-P1 (Protection of significant natural areas) to be clearer as to how remedying may exist, or remove entirely.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P1	WCC Environmental Reference Group	377.121	Amend	Considers that biodiversity compensation should not be available. It should not be possible for destruction of biodiversity to be available at a price.	Remove Point 5, biodiversity compensation, of ECO-P1 (Protection of significant natural areas) in its entirety.

# Natural and Environmental Values / Ecosystems and Indigenous Biodiversity

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P1	Director-General of Conservation	385.40	Oppose in part	Considers that the use of policy that implements an effects management hierarchy is supported, provided that, Policy ECO-P1 is amended to be in line with the wording in the exposure draft for the National Policy Statement on Indigenous Biodiversity.	Opposes in part ECO-P1 (Protection of significant natural areas), in its current form and seeks amendment.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P1	Director-General of Conservation	385.41	Amend	Considers that the use of policy that implements an effects management hierarchy is supported, provided that, Policy ECO-P1 is amended to be in line with the wording in the exposure draft for the National Policy Statement on Indigenous Biodiversity.	Amend Policy ECO-P1 (Protection of significant natural areas) to be in line with the wording set out in the exposure draft for the National Policy Statement on Indigenous Biodiversity.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P1	Paul M Blaschke	435.8	Support	ECO-P1 is particularly supported.	Retain ECO-P1 (Protection of significant natural areas) as notified.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P2	Tyers Stream Group	221.37	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain ECO-P2 (Appropriate vegetation removal in significant natural areas) as notified.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P2	Meridian Energy Limited	228.74	Support in part	Considers that the removal of vegetation may also be appropriate where necessary to provide for the functional or operational needs of regionally significant infrastructure, including vegetation removal from around structures.	Retain Policy ECO-P2 (Appropriate vegetation removal in significant natural areas) with amendment.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P2	Meridian Energy Limited	228.75	Amend	Considers that the removal of vegetation may also be appropriate where necessary to provide for the functional or operational needs of regionally significant infrastructure, including vegetation removal from around structures.	Amend Policy ECO-P2 (Appropriate vegetation removal in significant natural areas) as follows (or similar to provide for the functional and operational needs of regionally significant infrastructure):  Enable vegetation removal within significant natural areas identified within SCHED8 where it is of a scale and nature that maintains the biodiversity values, including to provide for:  1. Maintenance around existing buildings <u>and structures</u> ; or 2. Safe operation of roads, tracks and access ways; or 3. <u>Functional or operational needs in operating, maintaining, repairing, or upgrading regionally significant infrastructure; or</u> 4. ...
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P2	Fire and Emergency New Zealand	273.102	Support	Supports the policy as it enables the removal of vegetation within significant natural areas to reduce wildfire risk through the removal of highly flammable vegetation near existing residential units or on rural property	Retain ECO-P2 (appropriate vegetation removal in significant natural areas) as notified.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P2	Aggregate and Quarry Association	303.15	Amend	Considers that ECO-P2 is unlikely to apply to quarrying activities. Adding a point that enables vegetation clearance where the existing activity is a legal activity will achieve the right balance between protection of appropriate vegetation and allowing essential economic activities.	Amend ECO-P2 (Appropriate vegetation removal in significant natural areas) to add a sub-point enabling vegetation clearance where the existing activity is a legal activity.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P2	Transpower New Zealand Limited	315.164	Not specified	Considers that, on the basis ECO-P2 is not applicable to Infrastructure, Transpower is neutral on the policy. However, if the intent is that it does and should apply to the National Grid, seeks amendment to recognise vegetation removal to enable the safe and efficient operation and maintenance of the National Grid. [position is specified as neutral]	Retain Policy ECO-P2 (Appropriate vegetation removal in significant natural areas).  [Subject to amendment if the intent is that the policy applies to the National Grid]
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P2	Transpower New Zealand Limited	315.165	Not specified	Considers that, on the basis ECO-P2 is not applicable to Infrastructure, Transpower is neutral on the policy. However, if the intent is that it does and should apply to the National Grid, seeks amendment to recognise vegetation removal to enable the safe and efficient operation and maintenance of the National Grid. [position is specified as neutral]	Seeks that if the intent is that Policy ECO-P2 (Appropriate vegetation removal in significant natural areas) applies to the National Grid, it is amended to recognise vegetation removal to enable the safe and efficient operation and maintenance of the National Grid.

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P2	Royal Forest and Bird Protection Society	345.188	Support in part	Considers the policy should not start from a point of enabling because this policy will be considered when consenting the listed activities where they are no longer permitted: the matters of discretion for ECO R1.4, 1.5, 2.2, 3.2 refer to this policy. Considers it is not clear whether all or some of these references are in error, because of the deletion of some policies just prior to notification. Considers it is not appropriate to provide for new roads etc through SNAs as of right, this should be limited to maintenance of existing roads and tracks. It is not clear why conservation activities are referred to in this policy. The rules provide for restoration activities, not conservation activities. If 'conservation activities' is to be retained, see submission point on its definition. Considers the list should be exhaustive, so that it only provides for the intended activities.	Amend ECO-P2 (Appropriate vegetation removal in significant natural areas):  Consider enabling <del>Enable</del> vegetation removal within significant natural areas identified within <del>SCHED8</del> where it is of a scale and nature that maintains the biodiversity values, including to provide for: 1. Maintenance around existing buildings; or 2. Safe operation of <del>existing</del> roads, tracks and access ways; or 3. Restoration and conservation activities including plant and animal pest control activities; or 4. Natural hazard management activities; or 5. Reduction of wildfire risk through the removal of highly flammable vegetation near existing residential units on rural property; or 6. Opportunities to enable tangata whenua to exercise customary harvesting practices (excluding commercial use).
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P2	Paul M Blaschke	435.9	Support	ECO-P2 is particularly supported.	Retain ECO-P2 (Appropriate vegetation removal in significant natural areas) as notified.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P2	Te Rūnanga o Toa Rangatira	488.52	Amend	[No specific reason given beyond decision requested - refer to original submission].	Amend policy ECO-P2 (Appropriate vegetation removal in significant natural areas) to:  Enable vegetation removal within significant natural areas identified within SCHED8 where it is of a scale and nature that maintains the biodiversity values, including to provide for: 1. Maintenance around existing buildings; or 2. Safe operation of roads, tracks and access ways; or 3. Restoration and conservation activities including plant and animal pest control activities; or 4. Natural hazard management activities; or 5. Reduction of wildfire risk through the removal of highly flammable vegetation near existing residential units on rural property; or 6. <del>Opportunities to enable</del> Provide for tangata whenua to exercise customary harvesting practices (excluding commercial use).
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P3	Tyers Stream Group	221.38	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain ECO-P3 (Subdivision, use and development in significant natural areas) as notified.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P3	Meridian Energy Limited	228.76	Support	Considers Policy ECO-P3 (Subdivision, use and development in significant natural areas) gives effect to the objectives.	Retain Policy ECO-P3 (Subdivision, use and development in significant natural areas) as notified.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P3	Horokiwi Quarries Ltd	271.23	Support	Supports policy ECO-P3 (Subdivision, use and development in significant natural areas) as it provides a clear framework in which to address the effects of activities within an SNA.	Retain ECO-P3 (Subdivision, use and development in significant natural areas) as notified.

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P3	Royal Forest and Bird Protection Society	345.189	Support in part	<p>Considers the policy should not start from a presumption of allowing activities. It should also include SNAs in SCHED8, 9 and areas that meet Policy 23 criteria that have not yet been defined, as per the relief sought for the SNA definition. We seek the following change to the pōtai:</p> <p>We note that this policy applies to subdivision. Please see our submission points on the Subdivision chapter. Paragraph 1 should refer to ECO-P1.</p> <p>Paragraph 1 is supported, as long as ECO-P1 is amended in the way sought above, including with reference to the policy giving effect to NZCPS policy 11, ECO P5.</p> <p>Paragraph 2 suggests the activity will be demonstrated to be appropriate solely by considering an ecologist's report. A report is not the only consideration in determining appropriateness.</p> <p>Paragraph 3 needs amendment as it could be taken to suggest that no net loss via offsetting is the end goal, whereas there needs to be some effects built into the effects management hierarchy that must be avoided (in line with submission points above).</p> <p>Paragraph 4 is strongly supported. However, it would make more sense to include in ECO-P1. The concepts contained in paragraph 4 are what we have sought for inclusion in ECO-P1, albeit expressed as adverse effects that must be avoided.</p>	<p>Amend ECO-P3 (Subdivision, use and development in significant natural areas):</p> <p><del>Only a</del> Allow for subdivision, use and development in significant natural areas listed in SCHED8 where it:</p> <ol style="list-style-type: none"> <li>1. Applies the effects management hierarchy approach in ECO-P21; and</li> <li>2. Demonstrates that it is appropriate, <u>including</u> by taking into account the findings of an ecological assessment for the activity in accordance with APP15; and</li> <li>3. Ensures the activities effects on biodiversity values are appropriately managed in accordance with the effects management hierarchy, <u>and where residual effects remain after avoiding, remedying or mitigating, to</u> achieve no net loss of biodiversity values of the <del>identified</del> significant natural area; and</li> <li>4. Ensures that the ecological processes, functions and integrity of the significant natural area are maintained.</li> </ol>
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P3	WCC Environmental Reference Group	377.122	Support	SNAs must be protected usually, however, this policy strikes a fair balance between interests in use and interests in protection. It is important that the effects management hierarchy is applied.	Retain ECO-P3 (Subdivision, use and development in significant natural areas) as notified.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P3	Director-General of Conservation	385.42	Amend	Policy ECO-P3 references the effects management hierarchy approach in ECO-P2, however the effects management approach is referenced ECO-P1.	Amend Policy ECO-P3 as follows: "Applies the effects management hierarchy approach in ECO-P21; and"
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P3	Paul M Blaschke	435.10	Support	ECO-P3 is particularly supported.	Retain ECO-P3 (Subdivision, use and development in significant natural areas) as notified.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P4	Paul Van Houtte	92.1	Amend	Considers that free roaming of cats should be restricted in ECO-P4 due to their killing of native birds and lizards when roaming, and for their spread of the toxoplasmosis disease.	Seeks that ECO-P4 (Protection and restoration initiatives) be amended to restrict free roaming of cats.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P4	Victoria University of Wellington Students' Association	123.41	Amend	Considers that ECO-P4 should be amended to allow for the practice of rāhui to be implemented when there is a threat to biodiversity from human activity. This is an important addition as rāhui is an important part of Māori conservation practice. This will allow certain protected species to thrive and be free from human interference for brief periods when there may be a threat of particular vulnerability.	Amend ECO-P4 (Protection and restoration initiatives) to include a provision that allows for the practice of rāhui to be implemented when there is a threat to biodiversity from human activity.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P4	Tyers Stream Group	221.39	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain ECO-P4 (Protection and restoration initiatives) as notified.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P4	Meridian Energy Limited	228.77	Support in part	Supports Policy ECO-P4 (Protection and restoration initiatives), provided the amendments requested to the mitigation hierarchy in Policy ECO-P1 (Protection of significant natural areas) are adopted.	Retain Policy ECO-P4 (Protection and restoration initiatives), provided the amendments requested to Policy ECO-P1 (Protection of significant natural areas) are adopted.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P4	Royal Forest and Bird Protection Society	345.190	Support	Supports that this policy is not limited to restoration in SNAs.	Retain ECO-P4 (Protection and restoration initiatives) as notified.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P4	WCC Environmental Reference Group	377.123	Amend	Generally supportive and particularly supportive of the recognition of mana whenua and land owners as key players in the wording. However, the submitter considers it vital that SNAs are not only protected but also restored.	<p>Amend ECO-P4 (Protection and restoration initiatives) to add a fourth point as follows:</p> <p><u>4. Where possible, recognise and assist with the financial costs associated with protection and restoration initiatives incurred by mana whenua, landowners and community groups.</u></p>

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P5	Tyers Stream Group	221.40	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain ECO-P5 (Significant natural areas within the coastal environment) as notified.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P5	Meridian Energy Limited	228.78	Support in part	Considers that policy ECO-P5 (Significant natural areas within the coastal environment) gives effect to the NZCPS. Considers that there is a minor editorial amendment required in clause 3 and there appears to be an error in the reference to Policy ECO-P2 (Appropriate vegetation removal in significant natural areas). It may be that this should be 'ECO-P1' (Protection of significant natural areas) (i.e. the mitigation hierarchy).	Retain Policy ECO-P5 (Significant natural areas within the coastal environment) with amendment.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P5	Meridian Energy Limited	228.79	Amend	Considers that policy ECO-P5 (Significant natural areas within the coastal environment) gives effect to the NZCPS. Considers that there is a minor editorial amendment required in clause 3 and there appears to be an error in the reference to Policy ECO-P2 (Appropriate vegetation removal in significant natural areas). It may be that this should be 'ECO-P1' (Protection of significant natural areas) (i.e. the mitigation hierarchy).	Amend Policy ECO-P5 (Significant natural areas within the coastal environment) as follows (or similar):  Only allow activities within an identified significant natural area within SCHED8 in the coastal environment where it can be demonstrated that they;  1. Avoid adverse effects on the matters in Policy 11(a) of the New Zealand Coastal Policy Statement 2010; 2. Avoid significant adverse effects and avoid, remedy or mitigate other adverse effects of activities on the matters in Policy 11(b) of the New Zealand Coastal Policy Statement 2010; and 3. Protects <del>the other</del> indigenous biodiversity values in accordance with <u>ECO-P1</u> <del>ECO-P2</del> .
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P5	Horokiwi Quarries Ltd	271.24	Oppose	Considers that given the nature of the existing quarrying activities undertaken and modified nature of the environment, parts of the Coastal Overlay as it relates to part of the exiting quarry site is opposed.	Seeks that the Significant Natural Area overlay and Coastal Environment overlay be amended as they relate to the Horokiwi quarry site.  [Refer to original submission, including figure and attachments]
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P5	Royal Forest and Bird Protection Society	345.191	Support in part	Considers the policy should refer to ECO-P1. In order to give effect to the NZCPS, this policy needs to apply in all zones, including residential. As noted above, this can be achieved by amending the definition of SNA to include SCHED8 and 9, and to any other area that meets Policy 23 RPS. The relationship between this policy and the general effects management hierarchy needs to be more clear. Currently the policies could allow for an argument that policy 11 NZCPS values could be managed in accordance with the general effects management hierarchy, which is incorrect. Amendments are sought to this policy and to ECO P1 above to achieve this.	Amend ECO-P5 (Significant natural areas within the coastal environment):  Only allow activities within an identified significant natural area within SCHED8 in the coastal environment where it can be demonstrated that they; 1. Avoid adverse effects on the matters in Policy 11(a) of the New Zealand Coastal Policy Statement 2010; 2. Avoid significant adverse effects and avoid, remedy or mitigate other adverse effects of activities on the matters in Policy 11(b) of the New Zealand Coastal Policy Statement 2010; and 3. Protects <del>other the</del> indigenous biodiversity values in accordance with <u>ECO-P21</u>
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P5	WCC Environmental Reference Group	377.124	Support	Supportive as the Policy is consistent with national direction and it ensures the protection of coastal SNAs in accordance with the NZCPS.	Retain ECO-P5 (Significant natural areas within the coastal environment) as notified.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P5	Director-General of Conservation	385.43	Support	Supports proposed Policy ECO-P5 (Significant natural areas within the coastal environment).	Retain policy ECO-P5 (Significant natural areas within the coastal environment) as notified.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P6	Tyers Stream Group	221.41	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain ECO-P6 (New plantation forestry) as notified.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P6	Royal Forest and Bird Protection Society	345.192	Support	Supports the policy.	Retain ECO-P6 (New plantation forestry) as notified.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P6	WCC Environmental Reference Group	377.125	Support	The submitter supports the intention that SNAs must be protected from new plantation forestry.	Retain ECO-P6 (new plantation forestry) as notified.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P7	Tyers Stream Group	221.42	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain ECO-P7 (Existing plantation forestry) as notified.

# Natural and Environmental Values / Ecosystems and Indigenous Biodiversity

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P7	Royal Forest and Bird Protection Society	345.193	Oppose	Considers it is not clear what activities this provision is intended to provide a policy basis for. While Forest & Bird may be able to support a policy such as this one, without the context of what rules/activities the policy provides for, the policy is opposed.	Delete ECO-P7 (Existing plantation forestry).
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P7	Royal Forest and Bird Protection Society	345.194	Amend	If the relief sought above to delete ECO-P7 is not accepted, seeks deletion of the word "identified" in the policy.	Amend ECO-P7 (Existing plantation forestry):  Provide for existing plantation forestry and associated activities where these maintain or restore the identified biodiversity values of significant natural areas.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-R1	Steve West	2.9	Not specified	Considers that ECO-R1 (Trimming, pruning or removal of vegetation within a significant natural area) is too restrictive. Native trees can grow over 15m tall and are not suited to small plots of urban land. The rules do not account for regular trimming which is important for maintaining bush in an urban environment.	Not specified.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-R1	Peter Kelly	16.4	Amend	Councillors have a democratic mandate to balance the interests of WCC residents against the important natural environment values represented by significant natural areas (SNAs). The Proposed Rules are essentially the Officer Draft Rules, but with the SNA designation removed from all residential zoned land.  Requests that if SNAs are returned to residentially zoned land, the provisions in the draft District Plan are reinstated and fine-tuned.	If the Proposed District Plan is amended to allow Significant Natural Areas on residentially zoned land:  Seeks that changes are made to ECO (Ecosystems and Indigenous Biodiversity) to give effect to the following provision:  Add Draft District Plan ECO-R1:  <u>c) where trimming or removal of vegetation is required to allow subdivision approved under SUB R-1 within an Significant Natural Area that minimises vegetation loss.</u>
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-R1	Oliver Sangster	112.11	Amend	Considers that it is important to strike a balance to ensure people can tend to growing bush in close proximity to existing buildings (e.g. houses) and structures (including underground pipes) to prevent damage due to tree roots growing around pipes and foundations, dead branches falling on roofs etc. Accordingly, the PDP should include provisions that this kind of maintenance be permitted to a reasonable level.	Seeks that ECO-R1 (Trimming, pruning or removal of vegetation within a significant natural area) be expanded to account for damage to underground property (e.g. pipes/foundations/driveways) from growing tree roots (whether "imminent" or otherwise).
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-R1	Tyers Stream Group	221.43	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain ECO-R1 (Trimming, pruning or removal of vegetation within a significant natural area) as notified.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-R1	Horokiwi Quarries Ltd	271.25	Amend	Considers that in its current drafting, the activity status for works within a SNA outside the CE, that are not provided for within R1.1 or R1.2, is not clear as rules R1.4, R1.5 and R1.6 all apply to vegetation within the CE. R1.3 only applies to certain activities. Horokiwi understands the intent of the rule ECO-R1.4 and 1.5 may be that if you do not meet R1.1 or R1.2 and you are not affecting any NZCPS policy 11(a) matters, you are permitted regardless of whether you are within or outside the CE. However, this is not clear and open to interpretation.  As proposed, the cascade rule approach does not work for vegetation work outside the CE in that there is no clear activity status and ECO-R1 is open to interpretation issues.	Seeks amendment to the activity status within ECO-R1 from non-complying under clause 6. to discretionary if amendments sought to the areas identified as SNAs (as outlined in Appendix C of the submission) and amendment to the Coastal Environment Boundary (as identified in Appendix D of the submission) are not accepted.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-R1	Horokiwi Quarries Ltd	271.26	Amend	Considers that in its current drafting, the activity status for works within a SNA outside the CE, that are not provided for within R1.1 or R1.2, is not clear as rules R1.4, R1.5 and R1.6 all apply to vegetation within the CE. R1.3 only applies to certain activities. Horokiwi understands the intent of the rule ECO-R1.4 and 1.5 may be that if you do not meet R1.1 or R1.2 and you are not affecting any NZCPS policy 11(a) matters, you are permitted regardless of whether you are within or outside the CE. However, this is not clear and open to interpretation.  As proposed, the cascade rule approach does not work for vegetation work outside the CE in that there is no clear activity status and ECO-R1 is open to interpretation issues.	Seeks an amendment to ECO-R1 (Trimming, pruning or removal of vegetation within a significant natural area) to clarify the activity status for trimming, pruning or removal of vegetation within a significant natural area that is not within the Coastal Environment and does not comply with ECO-R1.1 or ECO-R1.2.

# Natural and Environmental Values / Ecosystems and Indigenous Biodiversity

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-R1	Fire and Emergency New Zealand	273.103	Support in part	Supports the preventative mitigation of fire risk to property and life through providing for the clearance of vegetation as a permitted activity (all zones) in circumstances where FENZ is required to remove vegetation for the purposes of extinguishing or preventing the spread of fire or, where a notice has been served on a landholder to clear vegetation from a firebreak, in accordance with relevant sections of the FENZ Act.	Supports ECO-R1 (Trimming, pruning or removal of vegetation within a significant natural area) with amendment.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-R1	Fire and Emergency New Zealand	273.104	Amend	Supports the preventative mitigation of fire risk to property and life through providing for the clearance of vegetation as a permitted activity (all zones) in circumstances where FENZ is required to remove vegetation for the purposes of extinguishing or preventing the spread of fire or, where a notice has been served on a landholder to clear vegetation from a firebreak, in accordance with relevant sections of the FENZ Act.	Amend ECO-R1 (Trimming, pruning or removal of vegetation within a significant natural area) as follows:  1. Activity status: Permitted  Where:  ...  vi. Enable the ongoing restoration work within the Zealandia sanctuary where undertaken by the Karori Sanctuary Trust; <del>or</del> vii. To enable the maintenance of public walking or cycling tracks and parks maintenance and repair undertaken by the Department of Conservation, a Regional or Territorial Authority, or their approved contractor, and in accordance with ECO-S2; <del> or</del> <u>vii. It is necessary to avoid loss of life, injury or serious damage to property, including from the risk of fire.</u>
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-R1	Royal Forest and Bird Protection Society	345.195	Support in part	Supports that the rules under ECO-R1 apply to 'vegetation' within SNAs, not only indigenous vegetation. That is appropriate because exotic vegetation can provide significant habitat, and also can contribute to the ecosystem functioning of the SNA. Comment on each section of the rule are set out in the following submission points.	Not specified.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-R1	Royal Forest and Bird Protection Society	345.196	Support in part	Seeks that Council consider whether any activities should be permitted in residential areas, given our submission that residential SNAs must be reinserted. The April 2022 version of the plan (attached) included PAs for trimming or clearance for maintenance of buildings, within 5m of the building; and trimming or pruning only to maintain sunlight where a standard was complied with (then called ECO-S4, which regulated how trimming was to occur, and no branches less than 50mm wide, and over 50mm wide needs to be done by a works arborist and WCC notified prior). In residential areas, we would accept a PA for maintenance or repair of services (telecoms, wastewater etc), however for installation we submit this is better as a controlled activity, and for existing residential units only. This allows the Council more control over where and how the services are installed, so that the vegetation clearance can be kept to the absolute minimum. Providing for it as a PA does not encourage this. For services to residential units that are not existing at the time of plan notification, a higher consenting standard should apply, at least RDA. There was also a PA for a private access track, provided it complied with a standard (no wider than 1m, no trees removed where they have a trunk diameter exceeding that in Schedule 10 at 1.4m above ground). We submit this would be better as a controlled activity, to give the Council greater opportunity to ensure that any higher value parts of the SNA are avoided.	Reinstate the Draft Plan's provisions for trimming, pruning, clearance, and maintenance of buildings in Residential Areas, given the submitter is seeking to reinstate residential Significant Natural Areas.

# Natural and Environmental Values / Ecosystems and Indigenous Biodiversity

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-R1	Royal Forest and Bird Protection Society	345.197	Support in part	Considers the rule should refer to "lawfully established" public roads.	Amend ECO-R1 (Trimming, pruning or removal of vegetation within a significant natural area):  1. Activity Status: Permitted Where: a. The trimming, pruning or removal of vegetation is to: i. Ensure the operation of any <u>lawfully established</u> formed public road or rail corridor, private access leg, driveway or right of way where removal of vegetation is limited to within the formed width of the road, rail corridor or access; or...
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-R1	Royal Forest and Bird Protection Society	345.198	Oppose in part	Considers that new fences can involve the clearing of very large amounts of significant vegetation, and without some kind of limit, this activity is not appropriate as a PA. It should become a discretionary activity. The amount of allowed trimming/removal for maintenance should also be limited to what is strictly necessary, given that it could cover a very large area. We seek that the rule is clarified to ensure that the 2m limit is the total allowed, rather than 2m on either side of the fence. Paragraph (ii) should also include a limit, that the removal/trimming is only what is strictly necessary. Opposes the PA in (iv) applying to new access tracks; this activity should be discretionary. Queries whether this provision was intended to use the defined term 'access strip'?	Amend ECO-R1 (Trimming, pruning or removal of vegetation within a significant natural area):  2. Activity Status: Permitted Where: a. The trimming or removal of vegetation is to: i. <del>Construct new perimeter fences for stock or pest animal exclusion from areas or</del> maintenance of existing fences for stock or pest animal exclusion provided the trimming or removal of any vegetation does not exceed 2m in width ( <u>1m maximum on either side of the fence</u> ); or ii. Maintain an existing farm drain, septic tank disposal field, or constructed stormwater management or treatment device, <u>provided that the removal or trimming is limited to that which is necessary for the maintenance</u> ; or iii. To create a firebreak within 10m of an external wall or roof of a residential unit that existed at 18 July 2022; or iv. Maintain, <del>upgrade or create a new</del> an access track for agricultural, pastoral or horticultural activities in accordance with ECO-S3.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-R1	Royal Forest and Bird Protection Society	345.199	Oppose	Considers the activity has the potential to remove large amounts of significant vegetation or habitat, even where the ECO S4 is applied. It is not appropriate to be a controlled activity, as the Council will not be able to refuse consent, regardless of the effects. In the coastal environment, providing for this activity as a controlled activity fails to give effect to policy 11 NZCPS.	Amend ECO-R1.3 (Trimming, pruning or removal of vegetation within a significant natural area) to a higher activity status to align with policy 11 of NZ Coastal Policy Statement.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-R1	Royal Forest and Bird Protection Society	345.200	Support in part	Notes the rule appears to refer to ECO-P2 in error. Considers this rule should not be limited to excluding situations where policy 11(a) NZCPS is engaged because both paragraphs (a) and (b) of policy 11 require a different management approach than is set out in the effects management hierarchy of ECO-P1. Under ECO-P1, adverse effects only need to be avoided where practicable. That is contrary to the policy 11(a) requirement to avoid certain effects, and also to the policy 11(b) requirement to avoid significant adverse effects. Support matter of discretion reference to ECO-P1 (assuming that was intended)	Amend ECO-R1 (Trimming, pruning or removal of vegetation within a significant natural area):  5. Activity status: Restricted discretionary Where: a. Compliance with any of the requirements of ECO-R1.1 cannot be achieved; and b. The significant natural area does not contain any matters identified in Policy 11(a) of the New Zealand Coastal Policy Statement 2010 where located within the coastal environment.  Matters of discretion are: The matters in ECO-P2 <del>1</del> , ECO-P3 and ECO-P4; and The extent and effect of non-compliance with any relevant standard not met as specified in the associated assessment criteria for the infringing standard.



Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-R1	Royal Forest and Bird Protection Society	345.201	Support in part	Notes the rule appears to refer to ECO-P2 in error. Considers this rule should not be limited to excluding situations where policy 11(a) NZCPS is engaged because both paragraphs (a) and (b) of policy 11 require a different management approach than is set out in the effects management hierarchy of ECO-P1. Under ECO-P1, adverse effects only need to be avoided where practicable. That is contrary to the policy 11(a) requirement to avoid certain effects, and also to the policy 11(b) requirement to avoid significant adverse effects. Support matter of discretion reference to ECO-P1 (assuming that was intended)	Amend ECO-R1 (Trimming, pruning or removal of vegetation within a significant natural area):  5. Activity status: Restricted discretionary Where: a. Compliance with any of the requirements of ECO-R1.1 cannot be achieved; and b. The significant natural area does not contain any matters identified in Policy 11(4) of the New Zealand Coastal Policy Statement 2010 where located within the coastal environment.  Matters of discretion are: The matters in ECO-P2, ECO-P3 and ECO-P4; and The extent and effect of non-compliance with any relevant standard not met as specified in the associated assessment criteria for the infringed standard.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-R1	Royal Forest and Bird Protection Society	345.202	Amend	Supports non-complying status attaching to this activity. Opposes the application of this rule being limited to policy 11(a) NZCPS situations. Considers non-complying status should also apply where policy 11(b) is engaged. Also opposes the application of the effects management hierarchy in ECO-P1 applying to biodiversity that is required to be protected in accordance with policy 11(a) or (b) NZCPS as the policy requires that adverse effects (a)/significant adverse effects (b) are avoided, whereas ECO-P1 only requires avoidance of adverse effects where practicable. Considers the provisions need to be clear that the policy applying to the coastal environment (currently ECO P5) applies as a first step for these activities.	Amend ECO-R1 (Trimming, pruning or removal of vegetation within a significant natural area):  6. Activity status: Non Complying Where: a. Compliance with the requirements of ECO-R1.1 or ECO-R1.2 or ECO-R1.4 cannot be achieved; and b. The significant natural area includes matters identified in Policy 11(4) of the New Zealand Coastal Policy Statement 2010 where located within the Coastal Environment.  Section 88 information requirements for applications: Applications for activities within an identified significant natural area must provide, in addition to the standard information requirements, an ecological assessment in accordance with APP15: 1. Identifying the indigenous biodiversity values and potential impacts from the proposal; and 2. Demonstrating that <u>ECOP5 has first been met</u> , and the effects management hierarchy at ECO-P2 has been applied <u>to other adverse effects</u> .
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-R1	WCC Environmental Reference Group	377.126	Amend	The submitter considers these rules largely strike a good balance between protection and use, however, in the interests of the primacy of indigenous biodiversity, we propose changing the activity status of R1.4 and R1.5.	Amend ECO-R1.4. (Trimming, pruning or removal of vegetation within a significant natural area) from Restricted Discretionary to Non-Complying.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-R1	WCC Environmental Reference Group	377.127	Amend	The submitter considers these rules largely strike a good balance between protection and use, however, in the interests of the primacy of indigenous biodiversity, we propose changing the activity status of R1.4 and R1.5.	Amend ECO-R1.5. (Trimming, pruning or removal of vegetation within a significant natural area) from Restricted Discretionary to Non-Complying.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-R1	Zealandia Te Māra a Tāne	486.1	Support	Supports ECO-R1.a.vi. as notified.  Considers that this allows for adequate biosecurity and proactive work to protect the integrity of the predator-proof fence and to mitigate the biosecurity risk. It also enables occasional trimming specific areas to allow interpretation, enable viewsheds, or to maintain wetland areas.	Retain ECO-R1.a.vi. (Trimming or Removal of Indigenous Vegetation within a Significant Natural Area) as notified.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-R2	Tyers Stream Group	221.44	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain ECO-R2 (Removal of non-indigenous vegetation within a significant natural area) as notified.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-R2	Royal Forest and Bird Protection Society	345.203	Support in part	Supports this Permitted activity being limited to pest plants. Non-indigenous vegetation can provide habitat for indigenous fauna, and can otherwise form part of the ecosystem making up the SNA, and should not be able to be removed as of right. Considers this PA would be better incorporated into ECO-R1.1, given the issue below. Vegetation removal that did not comply with it would then become RDA (under ECO R1.4), or non-complying (under ECO R1.6).	Amend ECO-R2.1 (Removal of non-indigenous vegetation within a significant natural area) to be incorporated within ECO-R1 (Trimming, pruning or removal of vegetation within a significant natural area).

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-R2	Royal Forest and Bird Protection Society	345.204	Support in part	Notes the rule appears to refer to ECO-P2 in error. Considers it is also not clear whether the reference to ECO-P4 is therefore also in error – it appears that the appropriate references in the matters of discretion should be ECO-P1 and ECO-P3. If that is the case, we support those references.	Amend ECO-R2.2 (Removal of non-indigenous vegetation within a significant natural area):  2. Activity Status: Restricted Discretionary Where: a. Compliance is not achieved with ECO-R2.1  Matters of discretion are: The matters in ECO-P <del>2</del> <u>1</u> and ECO-P <del>3</del> <u>3</u> .  Section 88 information requirements for applications: Applications for activities within an identified significant natural area must provide, in addition to the standard information requirements, an ecological assessment in accordance with APP15 1. Identifying the indigenous biodiversity values and potential impacts from the proposal; and 2. Demonstrating that effects management hierarchy at ECO-P2 has been applied.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-R2	Royal Forest and Bird Protection Society	345.205	Support in part	Considers is not clear when this rule would apply. The rules in ECO-R1 already appropriately apply to the removal of all vegetation, including exotic vegetation. This rule states that it applies when compliance with ECO-R2.1 is not achieved. That suggests that the exotic vegetation at issue is not a pest plant. But if that is the case, it is already regulated by ECO R1. As noted above, we suggest that the PA ECO R2.1 is incorporated into ECO R1.1. it would then default to RDA under ECO R1.4 where the vegetation was not a pest plant. This would have he added benefit of engaging the required protections for the coastal environment, which are absent from this rule. ECO R2.2 could then be deleted. If this rule is retained, we seek that it replicates the approach of ECO R1.4, in that it does not apply where policy 11 NZCPS is relevant. We also seek an accompanying non-complying rule, to replicate ECO R1.6. That rule should refer to the coastal environment policy, ECO-P5, in the information requirements	Amend ECO-R2.2 (Removal of non-indigenous vegetation within a significant natural area) to be incorporated within ECO-R1 (Trimming, pruning or removal of vegetation within a significant natural area).  Add new parallel non-complying rule to ECO-R1.6.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-R2	WCC Environmental Reference Group	377.128	Amend	Considers that non-indigenous and old-growth vegetation (such as Pinus radiata) can be important habitat for indigenous species (such as Nestor meridionalis). It is important that removal of these large individuals is considered in that context.	Amend ECO-R2.2 (Removal of non-indigenous vegetation within a significant natural area) as follows:  Matters of discretion are: The matters in ECO-P1, ECO-P2 and ECO-P4.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-R3	Steve West	2.10	Not specified	Considers that requirements such as needing "eco-sourced local indigenous" plants, will further discourage native planting.	Not specified.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-R3	Nga Kaimanaaki o te Waimapihi	215.2	Amend	Considers that we need to preserve and restore indigenous native fauna.  As well as preying on our native birds, cats also eat a large number of our native lizards and wētā (which are still in decline).	Seeks amendment to ECO-R3 (Restoration and maintenance of a significant natural area) to add provisions that restrict pets from roaming in Significant Natural Areas.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-R3	Tyers Stream Group	221.45	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain ECO-R3 (Restoration and maintenance of a significant natural area) as notified.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-R3	Royal Forest and Bird Protection Society	345.206	Support in part	Notes this provision (and others) refers to 'identified values'. It is not clear what these are. The descriptions in SCHED 8 are often brief and high level. We seek that a greater level of detail for each SNA is provided in the schedules.	Clarify ECO-R3 (Restoration and maintenance of a significant natural area) to provide further detail on "identified values".

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-R3	Royal Forest and Bird Protection Society	345.207	Support in part	Considers the matters of discretion also need to refer to the policy giving effect to policy 11 NZCPS, currently ECO-P5.	Amend ECO-R3 (Restoration and maintenance of a significant natural area):  2. Activity status: Restricted Discretionary Where: a. Compliance with the requirements of ECO-R3.1 cannot be achieved  Matters of discretion are: The matters in ECO-P2 and ECO-P4  Section 88 information requirements for applications: Applications for activities within an identified significant natural area must provide, in addition to the standard information requirements, an ecological assessment in accordance with APP15: 1. Identifying the indigenous biodiversity values and potential impacts from the proposal; and 2. Demonstrating that effects management hierarchy at ECO-P2 has been applied; <u>and</u> 3. <u>Demonstrating the effects of the proposal give effect to ECO-P5 in relation the requirements of Policy 11 of the NZ Coastal Policy Statement.</u>
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-R3	WCC Environmental Reference Group	377.129	Support	Considers it is important to allow and encourage the restoration and maintenance of SNAs, and this provides a fair rule framework to do so.	Retain ECO-R3 (Restoration and maintenance of a significant natural area) as notified.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-R3	Zealandia Te Māra a Tāne	486.2	Amend	Considers that ECO-R3 should be amended with an additional clause that enables Zealandia operations to continue, as per other areas in the plan.  Considers that ECO-R3 may limit activities such as reintroductions of fauna species, and other related activities, as Zealandia Te Māra a Tāne is not subject to the Reserves Act, Conservation Act nor the Queen Elizabeth the Second National Trust Act.	Amend ECO-R3 (Restoration and Maintenance of a Significant Natural Area) by adding a clause that enables the ongoing restoration work within the Zealandia sanctuary where undertaken by the Karori Sanctuary Trust.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-R4	Tyers Stream Group	221.46	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain ECO-R4 (New plantation forestry within a significant natural area) as notified.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-R4	Royal Forest and Bird Protection Society	345.208	Support	Supports the rule.	Retain ECO-R4 (New plantation forestry within a significant natural area) as notified.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-R4	WCC Environmental Reference Group	377.130	Support	Considers that protection and restoration must come first in SNAs, but recognises there will be essential needs for the removal of vegetation. The submitter considers these standards are clear and comprehensive and strike a good balance between the two interests.	Retain ECO-R4 (Significant Natural Areas are maintained or restored by mana whenua in accordance with kaitiakitanga) as notified.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-S1	Tyers Stream Group	221.47	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain ECO-S1 (Trimming, pruning or removal where there is the imminent threat to the safety of people or property) as notified.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-S1	Royal Forest and Bird Protection Society	345.209	Support in part	Supports this standard, with the following amendment - Notes that both 'Technician Arborist' and 'Works Arborist' are defined in the Interpretation section of this Plan. Paragraph 3 of this standard should use the defined term 'Technician Arborist', as the definition requires the skills appropriate for risk assessment relevant to this activity. It is also clearer to refer to a defined term	Amend ECO-S1 (Trimming, pruning or removal where there is the imminent threat to the safety of people or property): ... 3. Any removal is undertaken or supervised by a <del>suitably qualified arboricultural expert</del> <u>Technician Arborist</u> .

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-S1	Greater Wellington Regional Council	351.154	Amend	Vegetation trimming standards and rules should be amended so that they also apply to both indigenous and non-indigenous vegetation. This would make it clear that all vegetation (aside from pest plants) is to be protected in these areas, except where otherwise specified for restoration or other purposes. Any non-indigenous plants within SNAs that are not pest plants may provide significant habitat for indigenous biodiversity such as birds, bats and lizards. This understanding is recognised in section 6(c) of the Act which directs the protection of the “significant habitats of indigenous fauna” not the significant indigenous habitats of indigenous fauna.	Seeks to amend standard (where relevant) to change ‘indigenous vegetation’ to ‘vegetation’.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-S1	WCC Environmental Reference Group	377.131	Support	Considers that protection and restoration must come first in SNAs, but recognises there will be essential needs for the removal of vegetation. The submitter considers these standards are clear and comprehensive and strike a good balance between the two interests.	Retain ECO-S1 (Trimming, pruning or removal where there is the imminent threat to the safety of people or property) as notified.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-S2	Tyers Stream Group	221.48	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain ECO-S2 (Vegetation removal associated with maintenance or repair of public walking and cycling tracks including parks maintenance and repair) as notified.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-S2	Royal Forest and Bird Protection Society	345.210	Support in part	Considers the standard could be more clear as to how much clearance is allowed.	Amend ECO-S2 (Vegetation removal associated with maintenance or repair of public walking and cycling tracks including parks maintenance and repair):  Vegetation removal or trimming must: 1. Not be greater than 2.5m in width in total, to accommodate the track
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-S2	Greater Wellington Regional Council	351.155	Amend	Vegetation trimming standards and rules should be amended so that they also apply to both indigenous and non-indigenous vegetation. This would make it clear that all vegetation (aside from pest plants) is to be protected in these areas, except where otherwise specified for restoration or other purposes. Any non-indigenous plants within SNAs that are not pest plants may provide significant habitat for indigenous biodiversity such as birds, bats and lizards. This understanding is recognised in section 6(c) of the Act which directs the protection of the “significant habitats of indigenous fauna” not the significant indigenous habitats of indigenous fauna.	Seeks to amend standard (where relevant) to change ‘indigenous vegetation’ to ‘vegetation’.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-S2	WCC Environmental Reference Group	377.132	Support	Considers that protection and restoration must come first in SNAs, but recognises there will be essential needs for the removal of vegetation. The submitter considers these standards are clear and comprehensive and strike a good balance between the two interests.	Retain ECO-S2 (Vegetation removal associated with maintenance or repair of public walking and cycling tracks including parks maintenance and repair) as notified.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-S3	Tyers Stream Group	221.49	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain ECO-S3 (Vegetation removal associated with farm access tracks) as notified.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-S3	Royal Forest and Bird Protection Society	345.211	Support in part	Supports the standard, though notes opposition to new tracks being a Permitted activity noted in previous submission points on ECO rules.	Retain ECO-S3 (Vegetation removal associated with farm access tracks) as notified.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-S3	Greater Wellington Regional Council	351.156	Amend	Vegetation trimming standards and rules should be amended so that they also apply to both indigenous and non-indigenous vegetation. This would make it clear that all vegetation (aside from pest plants) is to be protected in these areas, except where otherwise specified for restoration or other purposes. Any non-indigenous plants within SNAs that are not pest plants may provide significant habitat for indigenous biodiversity such as birds, bats and lizards. This understanding is recognised in section 6(c) of the Act which directs the protection of the “significant habitats of indigenous fauna” not the significant indigenous habitats of indigenous fauna.	Seeks to amend standard (where relevant) to change ‘indigenous vegetation’ to ‘vegetation’.

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-S3	WCC Environmental Reference Group	377.133	Support	Considers that protection and restoration must come first in SNAs, but recognises there will be essential needs for the removal of vegetation. The submitter considers these standards are clear and comprehensive and strike a good balance between the two interests.	Retain ECO-S3 (Vegetation removal associated with farm access tracks) as notified.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-S4	Tyers Stream Group	221.50	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain ECO-S4 (Vegetation removal associated with upgrading of existing and creation of new public walking and cycling tracks and associated buildings and structures) as notified.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-S4	Royal Forest and Bird Protection Society	345.212	Support in part	Supports the standard with minor amendment, though notes opposition to new tracks being a Permitted activity noted in previous submission points on ECO rules.	Amend ECO-S4 (Vegetation removal associated with upgrading of existing and creation of new public walking and cycling tracks and associated buildings and structures):  Vegetation removal <u>or trimming</u> must: 1. Not be greater than 2.5m in width in total, to accommodate the track
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-S4	Greater Wellington Regional Council	351.157	Amend	Vegetation trimming standards and rules should be amended so that they also apply to both indigenous and non-indigenous vegetation. This would make it clear that all vegetation (aside from pest plants) is to be protected in these areas, except where otherwise specified for restoration or other purposes.  Any non-indigenous plants within SNAs that are not pest plants may provide significant habitat for indigenous biodiversity such as birds, bats and lizards. This understanding is recognised in section 6(c) of the Act which directs the protection of the “significant habitats of indigenous fauna” not the significant indigenous habitats of indigenous fauna.	Seeks to amend standard (where relevant) to change ‘indigenous vegetation’ to ‘vegetation’.
Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-S4	WCC Environmental Reference Group	377.134	Amend	Considers that it is vital that any new tracks and associated buildings and structures are well considered from an ecological perspective, to avoid high-value biodiversity being inadvertently damaged.	Amend ECO-S4 (Vegetation removal associated with upgrading of existing and creation of new public walking and cycling tracks and associated buildings and structures) as follows:  Split ECO-S4 into two new standards, reading:  <u>ECO-S4: vegetation removal associated with upgrading of existing public walking and cycling tracks and associated buildings and structures</u>  <u>Vegetation removal must:</u> <u>1. Not be greater than 2.5m in width to accommodate the track and associated track structures; and</u> <u>2. Not be greater than 5m2 in area to accommodate any ancillary buildings or structures.</u>  <u>ECO-S5: Vegetation removal must:</u> <u>1. Not be greater than 2.5m in width to accommodate the track and associated track structures;</u> <u>2. Not be greater than 5m2 in area to accommodate any ancillary buildings or structures; and</u> <u>3. Demonstrate that it is appropriate by taking into account the findings of an ecological assessment for the activity in accordance with APP15.</u>