

**RESOURCE MANAGEMENT ACT 1991  
SUBMISSION ON A PUBLICLY NOTIFIED PROPOSED PLAN**

To: The Manager,  
Auckland City Planning,  
Private Bag 92516,  
Wellesley Street,  
Auckland 1024

Name of Submitter: Al Morrison  
Director-General of Conservation  
Department of Conservation

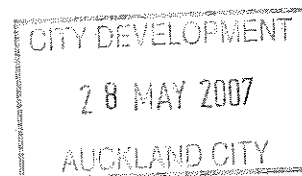
Submission On: Auckland City District Plan -  
Proposed Hauraki Gulf Islands Section 2006

Address: Department of Conservation  
Boulcott Street  
WELLINGTON  
(see below for address for service)

269, 2000, 2711, 2712, 2713, 2714, 2715,  
2716, 2717, 2718, 2719, 2724, 2725, 2727,  
2728, 2753, 2796, 2803,  
2805, 2807, 2819, 2820,  
2821,  
2822, 2823, 2824,

*OPPOSE*  
*Sean O'Bea*

2000



**STATEMENT OF SUBMISSION IN SUPPORT (IN PART)**

1 Pursuant to Clause 6 of the First Schedule to the Resource Management Act 1991, I Warwick Murray, Community Relations Manager (Auckland) of the Department of Conservation acting under delegated authority from the Director-General of Conservation, make a submission on the above Proposed Plan.

2 The specific provisions of the proposal that my submission relates to are:

- Chapter 10b - Settlement Areas: Objectives, Policies and Activity Tables
- Chapter 12 - Subdivision

3 My submission is that:

3.1 The Department of Conservation's ("DOC") interest in the Proposed Plan relates to its functions under section 6 of the Conservation Act 1987 and in particular:

- The significant area of Crown land administered for conservation purposes by DOC under the Conservation Act 1987; and
- Its duty to advocate the conservation of natural and historic resources generally.

3.2 Whilst DOC supports the identification of boundaries for existing and proposed settlement areas to enable communities to provide for their social and economic well being, this is contingent on any future growth areas not conflicting with sites of high ecological sensitivity on private land, acknowledged, and considered worthy of protection. DOC also needs to ensure that a sufficient level of protection is provided for land it administers that is within or on the periphery of settlement areas. DOC therefore considers that there is the need to incorporate additional objectives, policies and assessment criteria for the settlements areas, as

protect the ecological values associated with the public conservation land. The addition of these would better manage the effects of residential activities on neighbouring sensitive areas, and to better give effect to the purpose and principles as stated in Part II of the Resource Management Act 1991.

Without derogating from the generality of the above:

- 3.2 DOC supports the Council's intention to provide identified settlement areas within appropriate parts of Great Barrier Island. This in principle should enable managed growth to occur within these areas whilst protecting the ecological and landscape values of surrounding areas. DOC's concern, however, is that the change in intensification that would result from additional activities within the settlement areas has the potential to adversely affect ecologically sensitive areas within and surrounding the identified settlement areas. In most instances, the proposed settlement areas are surrounded by large tracts of land that are administered by DOC, and/or pockets of privately owned land that the Proposed Plan identifies as being ecologically sensitive.
- 3.4 The Council's Section 32 analysis acknowledges the sensitive nature of parts of the settlement areas. This is recognised in the objective and policies of 10b.3 of the Proposed Plan which apply as general objectives and policies to all settlement areas. However DOC considers that the recognition in the general objectives and policies does not adequately cascade down into the objectives, policies and assessment criteria that are applicable to each specific settlement area. The rules that are proposed for activities within the settlement areas are not considered to have adequate assessment criteria to consider proposals in order to avoid, remedy or mitigate adverse effects on ecologically sensitive areas as acknowledged the objective and policies of 10b.3 of the Proposed Plan.
- 3.5 The assessment criteria presently proposed is considered insular in its approach to the effects of proposed subdivision and development, whereas DOC considers that it is equally important to consider the implications of growth that may occur beyond the settlement area.
- 3.6 DOC considers that in enabling further development within the settlement areas, it is necessary to establish additional assessment criteria at the time of subdivision to ensure that any subdivision has due regard to the importance of the ecological values of the natural environment contained within surrounding sensitive natural areas. The incorporation of these at the time of subdivision will enable appropriate assessment when and where growth is to occur. It is considered that this can best be achieved by placing additional assessment criteria in clause 12.12.8 of the Proposed Plan. In addition, it is considered that each of the settlement areas should also have a policy that supports both the general objectives and that policies and links to the additional assessment criteria.

4 I seek the following decision from Auckland City Council:

- 4.1 By adding an additional policy to each of the settlement areas (10b.5.2, 10b.6.2, 10b.7.2.1, 10b.8.2, 10b.9.2, 10b.10.2, 10b.11.2, 10b.12.2, and 10b.13.2) as follows:

*"By ensuring that development of sites has sufficient regard for the sensitive ecological areas that may be located adjacent (or within proximity) to that area of development"*

AND

- 4.2 That Rule 12.12.8 – assessment criteria for Settlement Area subdivisions be amended to include the following additional criteria

6. The extent to which the subdivision layout maintains and protects the conservation and ecological values of adjoining or peripheral land that is either within the Conservation Land Unit or land identified as being a Site of Ecological Significance or Sensitive Area.

7. The extent to which additional controls (by way of covenants or similar measures) are adopted to protect the high ecological values that may exist with land adjoining settlement areas from predation by domestic pets or other predatory animals.

OR

4.3 Such other relief that will meet the concerns of the submitter.

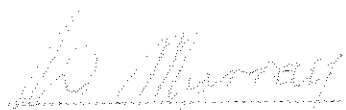
AND

4.4 Such consequential relief necessary to give effect to this submission.

5 I do wish to be heard in support of my submission.

6 If others make a similar submission I would be prepared to consider presenting a joint case with them at any hearing.

Signature



Date

8 / 12 / 2016

Warwick Murray  
Department of Conservation  
acting pursuant to delegated authority on behalf of  
Al Morrison - Director-General of Conservation.

Address for Service

Department of Conservation  
Private Bag 58 908  
Newton  
AUCKLAND

Attention

Warwick Murray  
Manager Community Relations

Telephone

(09) 307 9274

Facsimile

(09) 377 3919

Email

wmurray@doc.govt.nz