

SECTION 32 REPORT

PLAN CHANGE 23, HAURAKI GULF ISLANDS

APPENDIX D: GENERAL SUBMISSIONS

	Name	GENERAL SUBMISSIONS Issues	
1	Ormiston Associates	- Minimum lot size should be justified on environmental grounds for on-site wastewater treatment and disposal. This would include improved wastewater treatment and disposal methods having less impact on the environment. (see Sec 8.6.2.2.1 & 8.6.2.2.2) - Large lots don't necessarily result in less environmental impacts than smaller lots with improved wastewater treatment. - Waiheke has a history of basic septic tank and standard soakage field. Recently renovated baches contain high water consumption devises, without the upgrade of the disposal system. This has resulted in overloads of ground disposal systems and effluent breakout. This is a particular problem during high rainfall months. - Septic tanks provide a very low level of treatment with little reduction in pathogens within wastewater. - Beach water quality is lowered by runoff from Waiheke Island catchments discharging onto beaches. - Modern On-Site Wastewater Treatment and Disposal - High level waste water treatment - Realistic design flow when estimating wastewater production - Soil type - Ground slope - Use of approp. Disposal method - Applying minimum setback distances from surface water and groundwater - Rainfall - Advantages of the above include: - Runoff reduced - Topsoil not required to reduce faecal coliform content by a significant amount - Remaining pathogens more readily removed by topsoil - Less potential for overloading disposal field	- The Plan should require any development install: - domestic wastewater package treatment plant; - dripper irrigation for treated wastewater irrigation - the system be sized to the max daily wastewater flow based on TP58 guidelines - The max discharge volume per lot should be based on lot area as per ARC gross lot area to discharge volume criteria – <u>Gross Lot Area</u> -1.5 & greater <u>Max Daily Wastewater Flow</u> Or a discharge consent from the ARC required: Eg. $\frac{1275\text{sqm}}{1.5} = 850\text{L/d}$ - The areas available for wastewater disposal should take into account any set back required from surface water,

	Name	GENERAL SUBMISSIONS Issues	
			groundwater, buildings and embankments. • If the above criteria are not met, the lot size should be increased. Although the package treatment plants and drip irrigation should be the only systems allowed in clay soils that are typical on Waiheke Is. • A more realistic lot size is 1275sqm. This is equivalent to a 3-bedroom house with roof water supply and upmarket water production fixtures.
7.	Department of Conservation - Ms. Ruth Wilkie	• Support intention of the proposed amendments as they give greater clarity and certainty • 8.2 – Securing public access is strongly supported • Ensure that legal access to sites is provided in a manner that doesn't adversely affected the environment. • etc	
	Brian and Robin Griffiths	• Support for Objective 8.3.1 - high conservation value • All subdivision applications should be publicly notified unless permitted activities. • Should be minimum & median site sizes in all Land Units. Then there wouldn't be a need for "bonus density provisions". • One clear and comprehensive rule & stick to that • Separate objectives relating to protection of rural character and amenity value. • Subdivision and landuse need to be integrated. Subdivision would only occur when a particular land use activity is planned for some time in the not too distant future. Eg a new urban subdivision would only take place when existing residential areas are at least 90% full. • Public access and open space – the requirements must be secured at the time of subdivision. This will avoid compliance problems. • Land Unit 21 (p17) lack of clarity relating to the minimum size lots and numbers of lots allowed. Variations are hinted at but no thresholds are given. Section D (p 17) covers this well so why	

	Name	GENERAL SUBMISSIONS Issues	
		depart from this? Vehicle access should be around, not through conservation areas.	
	Manukau City Council - Pat Holm	- Minor subdivision - minor boundary adjustment, amendments to cross leases, unit titles and company lease plans for the purpose of showing additions and alterations to buildings, accessory buildings and areas for exclusive use by owner or owners. Also includes the creation of rights of way provided that all sites are in the same zone, and the conversion of cross lease into freehold titles where relevant development and performance standards are met. - MCC has a 2 tiered approach to subdivision. The first consent is a RDA; each subsequent stage is a controlled activity – if the subdivision is in general accordance with the scope and terms of the original land use consent. The advantage to developers is that all details are not required at the original consent stage. - Financial contributions could address ongoing management of natural water systems. Even if in private ownership, they deteriorate and need cleaning up and revegetation. - Suggested performance standard – For proposals involving ground disposal of sewage, the results of an evaluation from a suitably qualified person to indicate: (i) whether the site has sufficient capacity for a wastewater disposal field including assessment of soil types and percolation tests. (ii) Whether the regional rules for on site wastewater disposal are complied with. If not, a resource consent may be required from the ARC (iii) Where no more than one new site will be created, including rural settlements, whether a community or individual wastewater treatment and disposal system is most appropriate, having regard to any existing problems within the vicinity of the site.	
	K McCathcart	- Subdivision rules should recognise more strongly the Gulf Island's status as within a National Maritime Park. Also as the remaining "green fields" in AC. - The above is paralleled by the Liveable Communities Surveys - HGI is within the coastal environment, development impacts on the catchment and coastal waters are significant issues. Request more criteria related to this. - Subdivision requiring CoC only – what provisions for collection of 10% financial contribution without resort to section 35 of the Building Act 1991, which is challengeable. Also, would like s32 that relates to non-notification be made available to the public. As all CoC do not carry the necessary reporting	

	Name	GENERAL SUBMISSIONS Issues	
		assessment under S93-94. - Restricted discretionary activity with no further assessment necessary under the intensity level rules (some thresholds and triggers have yet to be determined) if it is demonstrated that certain requirements can be satisfied. Request that s32 that relates to non-notification be made available to the public and exactly what activities will be considered as restricted discretionary. There is great public interest in subdivision in the Gulf, in most cases consultation with the community may be appropriate. S32 material will need show where non-notification is appropriate. - Rules about unit title and company leases To LU 11 and 12 will intensify the density of residential use in those areas is directly contrary to the objectives and strategies that relate to maintenance of the rural character of the Gulf. S32 should be released that justifies this major proposed plan change. Further community consultation should be undertaken to after explaining to the community what this means. There has been a reaction to the proposal for Unit Title in LU14, as a way around the subdivision rules. In the visitor facility land units (14), apartments are being sold that are visitor facilities. The low scale visitor facility concept that maintains the character of the Gulf will be lost if the intensity of the ability to gain strata title is changed – particularly in residential areas and Land Units directly adjacent to residential areas. Unit title criteria should be changed to reflect floor area ratios with tough criteria set down to retain amenity where unit title is a listed discretionary activity. Unit title should be non-complying in LU 11 and 12 and on all of Great Barrier. It should only be allowed in LUs adjacent to residential areas and on public reserves after careful consideration of strict criteria and s93 & 94 of the RMA. - Oppose changes that are less restrictive. Support changes that make criteria clearer and more certain. - Suggests provision for “conservation style” subdivisions. Eg. “cluster” developments in bush clad areas with smaller lots but only after strict covenants on bush removal etc.	
	ACC: HGI Planners	- Consistency of terms – lot, title and site - Treaty recognition in introduction but not again - Support pro-active encouragement for a comprehensive infrastructural approach at the micro level ie. community sewerage treatment systems, stormwater systems, facilities for firefighting etc. for subdivision as a whole. - Welcome additional emphasis on the effect of	

	Name	GENERAL SUBMISSIONS Issues	
		subdivision in terms of amenity ie. noise, traffic, pollution by generators, earthworks etc. Despite the fact that many of the provisions link back to s6B. • Suggest a provision for the re-zoning of land (to LU 17) taken for esplanade reserves, in order to make the rules more readily applicable. • Section 8.2 Resource Management Issues – bullet point 10 Suggested that Council explore the issue of solutions/provisions related to retiring farmers subdivisions. • Objective 8.3.1 – Council should recognise public access to areas other than the coastal marine areas. eg wetlands, streams and bush areas. • 8.3 Policy B – Does this provision allow consideration of variations to the minimum lot sizes where the lot will be used for conservation purposes? Are these lots solely for conservation or can they be built on? Will the whole conservation unit need to be contained within one lot? • Policy E – need to recognise in the provision that public access is not always desirable and reference to absolute requirement should be deleted. Eg. in some scientific and ecologically sensitive areas protection rather than access is the key focus. • 8.3.2 Objective – “<i>efficient use</i>” – vague term • 8.3.2 Policy B – reword “<i>by including in the Plan, techniques which are reflected in appropriate rules and methods, which achieve a flexible approach to subdivision that facilitates better land use and development potential based on land use capability</i>”. • 8.3.3 Policy F – potentially inconsistent with the “Essentially Waiheke” document which seems to promote at least on new village on Waiheke. Also, this provision doesn’t apply to Great Barrier as the plan has not recognised villages there. • 8.3.4 Policies G and H – plan should recognise the function of esplanade reserves for protection as well as public access. It is important that Council does not focus all its attention on obtaining land during the subdivision process – other voluntary mechanisms should be explored and encouraged, and funds should be committed during the Annual Plan process to advocate the protection and enhancement of areas. • 8.3.5 – strong support for this objective to integrate subdivision rules with land use activity rules where appropriate in order to achieve a more integrated approach to land use and development. • 8.3.3 Policy A – is this reasonable in Land Units 2,3, 9,1 and 4 which have very low triggers. Eg all subdivisions in LU 2 and 3 (earthworks) and 9	

	Name	GENERAL SUBMISSIONS Issues	
		(vegetation clearance, earthworks and access) will be non-complying. • 8.3.4 Policy C – is this achievable, long term objective. I.e. it would be easy to obtain a subdivision consent using the provision and change the land use at a later date. • 8.4 – Resource Management Strategy Why is the village concept not being applied to GB? • 8.5 RM Strategy include a reference to Policy Areas, along SMAs and land units. New Zealand Coastal Policy Statement • 8.5 Anticipated Results - pacing growth with provision of services - how will this be implemented? Can we justify declining solely on grounds that ACC can't afford to upgrade roads? Is this a matter already addressed through financial contributions. • 8.5 Anticipated Results – esplanade strips etc – include wetlands. Query whether there are any other “significant” waterbodies? Include provision for reserves for other reasons - protection. • Re: “efficient use of rural land” – are we requiring individual farming units to be economically viable? • Re: avoiding development in areas prone to natural hazards Support the theory behind the inclusion of this provision, the type of policy requires investment in terms of collation of data eg. flood expectancy data. Unless Council allocates funds for this the policy will be ineffective and is unable to be • 8.6.1E – where more than one land unit is involved in the subdivision. What happens where over two/three land units involved? This causes considerable problems – would like more input into this. • 8.6.1.H(b) – Staged Development – Reword to clarify “Each stage will only be approved when the Council is satisfied that the conditions that apply to the previous stage have been met, as well as any other conditions of the subdivision consent which are required to be given effect to at that time.” J – Why need to be in the public interest? Should the focus be on the adverse effects on the community, i.e. the proposal shouldn't adversely affect the community interest, however we do not consider that the proposal is required to be in the public interest. • 8.6.1.Kd This seems in the wrong location (i.e. in the rules section). It will be used as a guideline and should be located accordingly. • N – stopping of unformed roads – what assessment criteria are to be used? - open ended, needs guidance. Should be deleted unless Council is prepared to adopt a process which is separate to the subdivision process. Otherwise	

	Name	GENERAL SUBMISSIONS Issues	
		subdivision could be held up by this process. 8.6.2.1 Permitted activities – Boundary adjustment needs to be defined. Is this section practical? Eg. where a LU11 lot has been developed to 12% coverage (thereby not meeting its 15% coverage potential) would a boundary adjustment be disallowed given its inability to meet (ii). Whereas a lot of the same size/configuration which had developed up to 15% would be approved given its ability to meet all the above criteria. What are the environmental outcomes being achieved? 8.6.2.2.A Restricted Discretionary Activities – supported. However need assessment criteria, otherwise it is not meeting the intent of “restricted discretionary” categories, ie. it has become a listed discretionary activity, however discretion has not been limited. A(c) Restricted Discretionary activities – fix typo D – subdivisions involving esplanade reserves – Guideline document not available to staff. 8.6.2.2.1(d) Minimum lot areas Easier to realign the Policy Area boundaries to ensure properties aren’t affected. What is this achieving in resource management terms? 8.6.2.2.2E – <i>“The subdivision shall provide for lots at a ratio of one lot per 5ha of gross land area of the site subject to a Comprehensive Rural Development application unless increased in terms of the Bonus Density Provision set out later in this Rule;”</i> – this rule needs updating as it has already been achieved. (ie. the maximums have already been achieved.) Define gross land area. 8.6.2.2.2.F Land Unit 24 – change wording of (a) to <i>“The subdivision of buildings which were in existence at the date the Plan became operative; or</i> Bonus Density provisions for LU24 Pakatoa needs visionary initiatives – cluster housing, ridgelines, discrete housing locations etc. Need to define what should be included in a CDA. 8.6.2.2.2.G LU25 – reword (a) to <i>“the subdivision of buildings which were in existence at the date of lodging the subdivision consent application”</i> 8.6.2.2.3 Variation to Minimum area requirements for Lots - reword as follows: <i>“With the exception of Land Units 11, 12 and 16 (where a variation from the minimum lot size in Table 4 is a non-complying activity) an application may be made to create lots having an area less than the minimum area specified in Table 4 but only to the extent specified in Table 5 and only where the criteria specified in the particular rules below are met. The following criteria shall be used for any application to vary the minimum area specified in Table 4.</i> 8.6.2.2.3 LU 1-10 and 20 - not appropriate place	

	Name	GENERAL SUBMISSIONS Issues	
		for the rules relating to Land Units 1-10 and 20. Rather should be included in s8.5.4.10. Reference should be made to LU20 in the first sentence. The second part of this rule, relating to land to be vested as reserve, should apply across all land units (as a general rule), not just LUs 1-10 and 20. It should be in the general rule section. 8.6.2.2.4 Special subdivisions – historically this provision has been abused. Intention is to protect the environment. In practice the rule justifies smaller lot sizes without a genuine concern for environmental outcomes. The applicant should have to prove that outcomes will be environmentally superior to alternative options. The changes go some way to change this rule, but need to go further. Use of the term “significant” needs to be clarified ie. is a hillside of regenerating manuka significant? Wording needs to be clearer and more consistent. EG. states that the rule only applies to lots that contain parts of the SEF within their boundaries. The next paragraph suggests covenanting the entire SEF as one lot. Would each lot owner receive a share in the title? <i>“The area of the share of the SEF cannot be included in any assessment of minimum lot area.”</i> This is unreasonable and unrealistic. Also if applicants can't include the SEF land in the assessment of the total land areas then they are unlikely to use the SEF provisions. Council should focus on environmental outcomes and adopt provisions which encourage people to protect features, therefore acting as a disincentive. B Company leases and unit title subdivision. – these need to be accompanied by proper plans, rather than final survey plans and site plans which accompany building consent applications. C. Re-subdivision of existing lots – outline the differences between the provisions for boundary adjustments and resubdividing existing lots. Amend (b) to read <i>“The proposed subdivision shall not create any lots which are smaller than those in existence at the time of application”</i>. D. Special subdivision rules for Policy Areas 1-4 only – Amend to read “D Special subdivision rules for Policy Areas 1-4 only. “The rules provide for a special subdivision in Policy Areas 1-4 only...” Table 4: Minimum Area for Lots (in ha) – Please clarify the terms used ie. NB (not provided for). If it is non-complying, we should use that terminology. S8.6.5 Hazards No provision for wild fire a key threat on GB etc. Best place to deal with this. Fire breaks around houses – should be mandatory. Access for fire appliances and resources for firefighting. Time to provide information including flood expectancy, hazard data, coastal erosion analysis, geotech studies and wildfire threats.	

	Name	GENERAL SUBMISSIONS Issues	
		Land Unit 3 is an anomaly. Why is a land unit comprising drained swampland targeted for relatively intensive subdivision? The existing rules reflect historic patterns rather than desirable environmental outcomes. This anomaly does not fit well with the emphasis on the coastal environment.	
	Gary Peters Utility Planning ACC	Subdivision of LUs 11 & 12 is allowed under rule 8.6.2.2.2.A provided onsite wastewater treatment is adequate and is based on discharge to ground. This is inappropriate because: • <i>Some parts of the island exhibit common problems related to high groundwater levels and trench overloading. Cases of watercourse pollution due to overloading and effluent break out from deep soakholes on steep slopes have also been observed.</i> - The worst pollution problems are in the catchments of oneroa, Blackpool, Surfdale, Little Oneroa and some other areas. - Onsite disposal to ground is not practically possible in these sub catchments due to the relatively impervious nature of the subsoils. Therefore further densification in these areas should be avoided. - Most of the site areas are 1000sqm (approx). Further subdivision will exacerbate waste water problems. • <i>Ground disposal should not be attempted in areas where the ground is impervious and the ground water table is near the ground surface. Similarly deep disposal should not be attempted where ground stability is at risk or effluent break outs occur elsewhere off the site.</i> - Large parts of Waiheke Island are located on impervious subsoils with high ground water levels. - Where ground soakage capacity is limited <i>evapotranspiration systems</i> are often used for effluent disposal. These are effective in climatic areas where there is relatively little rainfall and high wind or sunshine levels to evaporate or dissipate the effluent by plant transpiration. Consequently these systems work well in summer, but can be ineffective in winter. Evaporation rates in winter on Waiheke Island are very low. There can be a water surplus where more water precipitates onto the land than is evaporated off. Therefore ET systems can fail resulting in leakage of only partially processed effluent onto the land. • Efficiency of on site waste water systems Most on site waste water systems comprise the following elements:	

	Name	GENERAL SUBMISSIONS Issues	
		- Septic tanks of varying sizes - Evapotranspiration bed or - Field soakage disposal drains or - Aerated systems - Single pass or recirculating sand filters If properly operated and maintained septic tank can remove 33%-60% of the biochemical oxygen demand (BOD) loading and 80%-90% of suspended solids (SS) loading. Fecal coliform reduction is in the order of 95%. Saturated winter conditions can reduce the effectiveness of these beds to zero. The effluent may be discharge to surround land and then into ground and surface water systems. Aerated and sandfilter systems are very effective in treating domestic waste, however they are expensive to install and run and need ongoing maintenance from experience operators. Few domestic properties on the Island are fitted with these systems. • Performance Monitoring ACE monitor the performance of on site waste water systems and registers all official odour and effluent complaints on a data base. Many more complaints have been investigated directly. These are not listed on the TCS data base. • Utility Planning Initiatives - Property inspection programme – to assess the adequacy of the existing private wastewater disposal fields, Council has instituted a voluntary Property Inspection Programme. This consists of inspections of the physical disposal fields by 2 wastewater engineers. They will observe the effects of the disposal field performance upon the immediate environment. Each property inspection will be logged onto a data base. This will be interfaced wit the FIS allowing hazard mapping that can be used to assist remediation strategies. - Owhanake Waste water treatment Plan and Oneroa Reticulation On file is a letter from the Minister of Health requiring ACC to remediate wastewater problems on Waiheke, particularly around the Oneroa Commercial Centre. This resulted in a reticulation network in and around the Oneroa Commercial Centre and the proposed Owhanake Wastewater Treatment Plant. These works are interim to medium term solutions to the problems. - Long term planning is needed to avoid future problems arising. Utility Planning is assessing the existing and future wastewater needs of the island. • Consequences of Existing Plan Provisions - Effluent quantities will increase through the catchments. Oneroa, Blackpool, Surfdale,	

	Name	GENERAL SUBMISSIONS Issues	
		Little Oneroa, Hekerua Bay and Palm Beach becoming a health hazard or nuisance. This is already happening in Blackpook, Little Oneroa and Palm Beach. - Contamination of ground water systems including streams and beach foreshore areas would cause further degradation; including offensive odours. - Possible contamination of bore water - The Council could be directed by the Minister of Health to reticulate these areas, treat the effluent and discharge to the environment. • Future Planning The provision of a wastewater infrastructure system is dependent on the following factors: - The present onsite disposal of waste water – is it non injurious to public health and the environment? Does it poise a nuisance under the Health Act? Is it physically possible to safely dispose of treated wastewater to ground soakage so that it doesn't pollute existing ground water systems ? - Will future bore water, used over summer to recharge domestic water supplies, remain unpolluted without a reticulated system being installed? - Can community based schemes be used to mitigate public health risks? - Is there sufficient appropriate land available within each catchment to allow ground disposal methods to be used? ie. should all or part of the existing recreation reserves located within a catchment to be fence off to allow for ground disposal? - Is there appropriate land on the Island to utilise ground disposal methods? The information at hands indicates that the answer is “No” to all of the above questions. The problems arises from the geology of the Island (soils not suited to ground disposal) and the density of development as defined by the existing district plan. If the existing method of disposing of wastewater is not acceptable, then further action will need to be taken. Council will be obliged to collect wastewater from the outlets of the existing septic tanks and reticulate the catchments identified as being in need of upgrading. The Council will need to provide secondary treatment to this effluent and discharge to either land, sea or air. Investigation into the suitability of these disposal options is continuing. • Immediate Actions Required: Possible initiative that Council could take: - Limit permanent resident numbers in Oneroa, Blackpool, Surfdale, Little Oneroa catchment areas.	

	Name	GENERAL SUBMISSIONS Issues	
		- Limit tourists numbers to Waiheke to acceptable levels - Change the Wastewater Bylaw. Require each property to install state of the art private wastewater treatment system. Retro fitting these systems to the 4093 existing developed properties would be a difficult exercise. - Reticulate the catchments in a) above and construct a wastewater treatment plant. The reticulation of the wastewater in the area mentioned above would be the most feasible option. However there would be a substantial cost. It may be inevitable considering the problems arising from the existing wastewater systems.	
	ARC	• Supports proposed provisions • General Matters : Supports concurrent processing of ACC and ARC consents - Amendment to last para under bullet point 2 Section 8.6.1A. <i>"Where a consent is also needed from the ARC (such as to take water, dispose of stormwater, etc) it must be applied for in conjunction with an application under these rules"</i>. This change clarifies that the concurrent processing of all consents is preferable to an applicant gaining individual consents from each consent authority at different times. The ARC encourages this approach throughout the region. - This comment also applies to bullet point 2 under Section 8.a6.2.2.2 Specific Land Units. A, Land Units 11 and 12 and Policy B under Objective 8.3.4. - Under 8.6.3.1 Explanation of Esplanade Areas, the last para discussed esplanade strips. The third bullet point concerns when public access should be restricted. This should include a discussion of examples to clarify when restricted access may be appropriate. • S8.6.2.2.1(d) Minimum Areas for Lots there is provision for the subdivision of a lot where part falls into a policy area and part does not. What if the area to be subdivided is quite small? This needs to be clarified. • S8.6.3.1 Explanation of Esplanade Areas – Esplanade strips – 3rd bullet point concerns when public access should be restricted. This should include a discussion of examples to clarify when restricted access may be appropriate. Water Resources – supply and allocation • 8.2 3rd bp should identify water supply as a potential constraint to subdivision in the Hauraki Gulf. • 8.3.3 Objective relates to <i>the appropriate growth</i>	

	Name	GENERAL SUBMISSIONS Issues	
		<i>and development of communities and recognition of the diverse lifestyles and cultures associated with the HGLs. Policies AOH give effect to this objective.</i> - Policy A (infrastructural constraints) doesn't relate well to this objective. Infrastructural constraints have been identified as an issue in the discussion paper. Therefore could justify having a separate objective articulated to address that issue. ARCs submission on <i>Essentially Waiheke</i> elaborates on infrastructural constraints. • Policy 9.4.7.1 of the ARPS relates to conservation, efficient use and reuse of regions water. Where water demand is equal or exceeds availability, the use of on-site tanks should be promoted. A rule should be inserted to this effect. Eg. from RDC Plan Change 76: <i>All water shall be supplied using on-site tanks.</i> <i>Where on-site tanks are to be used to supply potable water the following minimum storage capacities must be supplied:</i> • <i>Every shop, office or restaurant shall have storage capacity equal to or exceeding 56.8cubic metres.</i> • <i>Where traveller's accommodation is proposed 68.16cubic metres of storage shall be provided for every building forming part of the complex which provides overnight accommodation;</i> • <i>Every household unit shall have storage capacity equal or exceeding:</i> - <i>See submission</i> The quantities of water specified in the rule specifically to Rodney so will need changing. ARC Technical Publications 58 provides an estimate of water demand for various commercial activities. These estimates combined with rainfall yield for a particularly site and activity would allow more certainty for specifying on-site storage. Natural Heritage • Objective 8.3.1-supported as consistent with ARPS • Policy B – Develop more detailed criteria to determine which features qualify for such lots. Eg. How is an area of native bush assessed as being significant? Also establish a monitoring system to that conservation values on sites are maintained and protected. • Supports policy on dealing with unformed roads. • Last bp s8.6.1A All Applications – is supported. It recognises that a precautionary approach should be taken when assessing the potential environmental effects of any subdivision. This approach is advocated in ARPS. This statement should be expanded to include wildlife habitats and	

	Name	GENERAL SUBMISSIONS Issues	
		geological features. • S8.6.1.H.c it is proposed that consent conditions for staged development may require the establishment of revegetation prior to release of the Certificate of Title. Supported. Useful for ACC to develop criteria to determine when such vegetation will be considered “established” ie. is it considered established after 2 yrs, 5 yrs etc. • S8.6.1K.c – covenants should clearly identify in map form the boundaries of the covenanted area etc – is supported. • S8.6.1M Revegetation as a requirement. While supported, should also allow for creation of riparian margins, buffer zones between significant ecological areas and residential activities, and enhancement or restoration of ecological areas. • 8.6.1.M - Questions regarding bond. – How will this be enforced? How long will the bond be retained? How long will monitoring continue? Please clarify • S 8.6.2.2.3 Variation to Minimum Area Requirements for Lots for Land Units 1-10, criteria b,d,e,f,g, I for reducing the minimum lot area is supported. • S8.6.2.2.4 Special subdivisions, A,D, E, . Protection of Significant Environmental Feature(s) within land Units 1-10 and 20, criteria 1,2,3 and 6 is supported. F – does this seek to protect sites with ecologically significant features less than 4has? Eg, many wetlands and remnant areas of forest are less than that. Or does this mean the lot has to be a minimum of 4.0 has and the environmental feature has to be within this lot? What would happen to the surrounding land in such as case? Eg, if there was 1ha of wetland, how would the remaining 3ha be managed. Sediment and Stormwater Management • Cumulative Effects of subdivision – protection of receiving waters - through rules relating to sediment discharge, stormwater management and the protection of watercourses and other natural features. Stormwater management, encouragement of minimum earthworks and retention of natural features such as water courses should be encouraged for all subdivision within the HGI. • Guideline documents produced by ARC – Lowe Impact Design, Large Lot Stormwater Management Design Approach, Stormwater Treatment Devices • The success of these approaches is largely dependent on the extent to which their principles and methods are incorporated in to policy at district plan level. The principals and methods in these documents are being promoted to, and adopted by councils (and developers) across the region as ways to minimise the adverse effects of	

	Name	GENERAL SUBMISSIONS Issues	
		development on the environment. Consider incorporating these documents into the review of sub, either thru reference or by inclusion of the principles into the policies and rules of the Plan.	