

Statement of Evidence from Wellington City Council Environmental Reference Group Submitter 377

Presented 3:20pm Thursday March 21 2024 to the WCC District Plan Hearings Panel chaired by Commissioner Robert Schofield.

Thank you for the opportunity to speak to the hearings panel. My name is Michelle Rush, I am the Co Chair for the Wellington City Council Environmental Reference Group. (ERG) Our group comprises environmental professionals representing a range of ages, skills and backgrounds on environmental matters.

My background is in natural resource management, including work in the past, as an advocate for statutory resource management matters on behalf of primary sector organisations.

I no longer work actively in this area, and therefore consider myself a lay person when it comes to the legal and planning conventions of current day matters under the Resource Management Act.

ERG have four areas of interest within with Stream 7:

- Natural Open Space Zone
- Open Space Zone
- Tertiary Education Zone
- General Rural Zone

Below is what was presented in person at the hearing, with addition, at your request, of some clarifications to help make our submission clearer.

We have summarised the information in the following way: Items we support, where there is a common reason, have been grouped together.

Items for which we are seeking amendments are specified individually.

Thank you again for the opportunity to appear before you in support of our submission.

Michelle Rush
Co Chair
Wellington City Council Environmental Reference Group

WCC ERG Submitter 377 would like recorded our SUPPORT for the following notified district plan provisions:

Overall this support is for the following reasons:

We believe these provisions give effect to WCC district plan’s strategic objectives, now confirmed (at March 14 2024) including:

District Plan Strategic Objectives CC-02 (2) AND CC-02 (6); HHSASM-04, NE-01, NE-02, NE-03, in particular NE-03(3) and NE-05.

The provisions also reflect the Wellington City Council’s Long Term Plan 2021-2031, and specifically:

Vision

"Wellington 2040 – an inclusive, sustainable and creative capital for people to live, work and play”.

Community Outcomes

And the following two, of the four key Community Outcomes:

Environmental A sustainable, climate friendly eco capital. A city where the **natural environment is being preserved, biodiversity improved**, natural resources are used sustainably, and the city is mitigating and adapting to climate change – for now and future generations.

Social A people friendly, compact, safe and accessible capital city. An inclusive, **liveable, and resilient city** where people and communities can learn, are connected, well housed, safe and **healthy**.

We have **bolded** some elements in the quoted sections above for emphasis.

Please see the table below for the details of the supported provisions.

WCC ERG Supported notified plan provisions:

Chapter / Sub-part	Specific provision / matter	Position	Reason	Relief Sought
Natural Open Space Zone				
He Rohe Ahoaho Māori Natural Open Space Zone	NOSZ-P1 NOSZ-P2 NOSZ-P4 NOSZ-P5 NOSZ-P6	Support	Our Submission 377 noted that open space areas are areas of recreation and activity: enabling activities consistent with the purpose of these areas is part of enabling their cultural and amenity value.	Retain
Natural Open Space Zone	NOSZ-P7		Our submission 377 noted that currently there is insufficient focus on mana whenua and their ability to exercise customary practices: this policy helps to re-balance this	Retain
Open Space Zone				
He Rohe Ahoaho Open Space Zone	OSZ-O3	Support	Our submission 377 noted that currently there is insufficient focus on mana whenua and their ability to exercise kaitiakitanga: this objective helps to re-balance this	Retain

Chapter / Sub-part	Specific provision / matter	Position	Reason	Relief Sought
Policies				
He Rohe Ahoaho Open Space Zone	OSZ-P1 OSZ-P2 OSZ-P3 OSZ-P4 OSZ-P5	Support	Our Submission 377 noted that open space areas are areas of recreation and activity: enabling activities consistent with the purpose of these areas is part of enabling their cultural and amenity value.	Retain
He Rohe Ahoaho Open Space Zone	OSZ-P6	Support	Our submission 377 noted that currently there is insufficient focus on mana whenua and their ability to exercise customary practices: this objective helps to re-balance this	Retain
Rules				
He Rohe Ahoaho Open Space Zone	OSZ-R1 OSZ-R2 OSZ-R4 OSZ-R5	Support	Our submission 377 noted that providing for activities, of the type described here is appropriate for the open space zone.	Retain

Chapter / Sub-part	Specific provision / matter	Position	Reason	Relief Sought
	OSZ-R6 OSZ-R7 OSZ-R8 OSZ-R9 OSZ-R10			
He Rohe Ahoaho Open Space Zone	OSZ-R11	Support	Our submission 377 noted that providing for other activities with discretion is appropriate for the open space zone to help ensure these are appropriate to the character and amenity of the area, in accordance with its management plan, and avoid, remedy or mitigate adverse effects.	Retain
Tertiary Education Zone				

Chapter / Sub-part	Specific provision / matter	Position	Reason for submission	Decisions requested / relief sought
Tertiary Education Zone	TEDZ-04	Support	As stated in our Submission 377: We support the policy as it currently stands because of the need to assist Wellington's tertiary education sector into a transition of new learning styles (ie: Online learning). The student housing crisis is also addressed in point 4, with important emphasis placed on providing for a range of accommodation types that would include a range of prices and locations, acknowledging the need for	Retain

			cheaper higher quality living environments due to increased time spent in accommodation and increased cost of living.	
Tertiary Education Zone	TEDZ-P6	Support	As stated in our Submission 377: Support as the policy clearly and effectively encompasses all key considerations for future development within the Center Zone. In particular the need for maintaining the amenity of culturally significant sites, creation of green space, climate change resilience, and incorporating current and future public transport.	Retain
Tertiary Education Zone	TEDZ-P7	Support	As stated in our Submission 377: We strongly support this policy due to its clear and concise expression of support for improving Wellington City's tertiary education facilities whilst emphasising some of the most important considerations of any new development within the CBD that being their long term sustainability, resilience and capacity as a multi use building. In addition the policy also addresses the important role these facilities play in improving the resilience of surrounding areas to climate change induced natural hazards, an issue of increasing relevance and importance.	Retain

Chapter / Sub-part	Specific provision / matter	Position	Reason for submission	Decisions requested / relief sought
General Rural Zone				
He Rohe Tuawhenua Whānui	GRUZ-PREC01	Support	As stated in our Submission 377: Makara Beach and Village is a unique part of Wellington with difficult access and subject to natural	Retain

Chapter / Sub-part	Specific provision / matter	Position	Reason for submission	Decisions requested / relief sought
General Rural Zone			hazards. It is sensible that it has its own set of rules under a Makara Beach and Makara Village Precinct.	
He Rohe Tuawhenua Whānui General Rural Zone	GRUZ-01	Support	As stated in our Submission 377: Providing for rural activities, of the type described here, is well suited to the nature of the landscape.	Retain
He Rohe Tuawhenua Whānui General Rural Zone	GRUZ-PREC01-02	Support	As stated in our Submission 377: Makara Beach and Village is a unique part of Wellington with difficult access and subject to natural hazards: densified use and development is inappropriate in this place for landscape, open space, hazard and climate change issues (most residents will require private vehicles to access amenities) therefore it is not an area in which further housing should be encouraged.	Retain
Policies				
He Rohe Tuawhenua Whānui General Rural Zone	GRUZ-P1	Support	As stated in our Submission 377: Providing for rural activities, of the type described here, is well suited to the nature of the landscape. Further, the provisions give effect to the following WCC district plan objectives, now confirmed (at March 14 2024) including:	Retain

Chapter / Sub-part	Specific provision / matter	Position	Reason for submission	Decisions requested / relief sought
			District Plan Strategic Objectives CC-02 (2) AND CC-02 (6); NE-01, NE-02, NE-03, in particular NE-03(3) and NE-05.	
He Rohe Tuawhenua Whānui General Rural Zone	GRUZ-P2	Support	Goats are a pest in Wellington, causing damage to vegetation and habitat for native creatures. Keeping goats as livestock should be controlled for this reason.	Retain
He Rohe Tuawhenua Whānui General Rural Zone	GRUZ-P3	Support	Providing for activities, of the type described here, is suitable in the context of a rural landscape.	Retain
He Rohe Tuawhenua Whānui General Rural Zone	GRUZ-P4	Support	Providing for activities, of the type described here, is suitable in the context of a rural landscape.	Retain
He Rohe Tuawhenua Whānui General Rural Zone	GRUZ-P5	Support	Quarrying is a necessary activity: this policy signals how it needs to be conducted to minimise environmental effects in the rural landscape.	Retain

Chapter / Sub-part	Specific provision / matter	Position	Reason for submission	Decisions requested / relief sought
He Rohe Tuawhenua Whānui General Rural Zone	GRUZ-P6	Support	This policy is important to signal the incompatibility of urban development in the rural zone: this is essential if Wellington is to meet its goal to reduce its carbon footprint.	Retain
He Rohe Tuawhenua Whānui General Rural Zone	GRUZ-P11	Support	This policy gives an important signal as to the importance of retaining, as far as possible, indigenous vegetation, to help safeguard habitat, protect soil, and protect waterways.	Retain
He Rohe Tuawhenua Whānui General Rural Zone	GRUZ-PREC01-P1	Support	Makara Beach and Village is a unique part of Wellington with difficult access and subject to natural hazards: densified use and development is inappropriate in this place for landscape, open space, hazard and climate change issues (most residents will require private vehicles to access amenities) therefore it is not an area in which further housing should be encouraged.	Retain
Rules: Land Use Activities				
He Rohe Tuawhenua Whānui General Rural Zone	GRUZ-R1	Support	Providing for activities, of the type described here, is suitable in the context of a rural landscape.	Retain

Chapter / Sub-part	Specific provision / matter	Position	Reason for submission	Decisions requested / relief sought
He Rohe Tuawhenua Whānui General Rural Zone	GRUZ-P2	Support	Goats are a pest in Wellington, causing damage to vegetation and habitat for native creatures. Keeping goats as livestock should be controlled for this reason.	Retain
He Rohe Tuawhenua Whānui General Rural Zone	GRUZ-P3	Support	Providing for activities, of the type described here, is suitable in the context of a rural landscape.	Retain
Rules				
He Rohe Tuawhenua Whānui General Rural Zone	GRUZ-R6	Support	This provision will help ensure as few barriers as possible to individuals and groups engaging in conservation work helping to safeguard habitat, protect soil, and protect waterways.	Retain
He Rohe Tuawhenua Whānui General Rural Zone	GRUZ-R7	Support	Providing for activities, of the type described here, and with the activity classes as described here, is suitable in the context of a rural landscape.	Retain

Chapter / Sub-part	Specific provision / matter	Position	Reason for submission	Decisions requested / relief sought
He Rohe Tuawhenua Whānui General Rural Zone	GRUZ-R8	Support	Providing for activities, of the type described here, and with the activity classes as described here, is suitable in the context of a rural landscape.	Retain
He Rohe Tuawhenua Whānui General Rural Zone	GRUZ-R10	Support	Requiring discretion for intensive indoor primary production is necessary given the potential for significant adverse effects.	Retain
He Rohe Tuawhenua Whānui General Rural Zone	GRUZ-R11	Support	Requiring discretion for animal boarding and day care is necessary given the potential for significant adverse effects.	Retain
He Rohe Tuawhenua Whānui General Rural Zone	GRUZ-R12	Support	Quarrying is a necessary activity that has major effects: discretion is necessary to ensure that it is to be conducted to minimise or mitigate environmental effects in the rural landscape.	Retain
Standards				

Chapter / Sub-part	Specific provision / matter	Position	Reason for submission	Decisions requested / relief sought
He Rohe Tuawhenua Whānui General Rural Zone	GRUZ-S1	Support	Providing for height limits on activities, of the type described here, and with the activity classes as described here, is suitable in the context of a rural landscape.	Retain
He Rohe Tuawhenua Whānui General Rural Zone	GRUZ-S2	Support	Providing for floor areas to the extent described here, and with the activity classes as described here, is suitable in the context of a rural landscape.	Retain
He Rohe Tuawhenua Whānui General Rural Zone	GRUZ-S4	Support	Providing for setbacks as described here, and with the activity classes proposed, is suitable in the context of a rural landscape.	Retain
He Rohe Tuawhenua Whānui General Rural Zone	GRUZ-S5	Support	Providing for setbacks as described here, and with the activity classes proposed, is suitable in the context of a rural landscape.	Retain
He Rohe Tuawhenua Whānui General Rural Zone	GRUZ-S6	Support	Providing for height in relation to boundary as described here, and with the activity classes proposed, is suitable in the context of Makara beach and village.	Retain

WCC ERG Submitter 377 are seeking amendments to the following:

Chapter / Sub-part	Specific provision / matter	Position	Reason for submission	Decision requested/ Relief Sought
Tertiary Education Zones	TEDZ-04	Amend	<p>As stated in our submission 377, The objective doesn't clearly state whether it includes adverse environmental impacts of development and construction in its outline. We suggest an amendment to clarify that this is the intent, to better align with Policy 6 and 7, the preamble and overarching sustainability goals for the region outlined within Wellington 2050.</p> <p>This will better ensure the objective is giving effect to District Plan objectives now confirmed (at March 14 2024), particularly CC-02 (2) and CC-02 (5); CC-03(2) and CC-03(5)</p>	<p>Amend as follows</p> <p>Adverse effects of activities and development in the Tertiary Education Zone including adverse environmental impacts are managed effectively both;</p> <p>Within the Zone; and</p> <p>At interfaces with;</p> <ol style="list-style-type: none"> a. Heritage buildings, heritage structures and areas; b. Sites and areas of significance to Māori; c. Residential zoned areas; d. Open Space zoned areas; and e. Key pedestrian streets

Chapter / Sub-part	Specific provision / matter	Position	Reason for submission	Decision requested/ Relief Sought
Tertiary Education Zone	TEDZ-R3	Amend	<p>The rule fails to include the important long term sustainability and resilience considerations outlined within policies, 6 and 7. As such we suggest including these within the listed policies outlined within the matters of discretion.</p> <p>This will better ensure the rule is giving effect to District Plan objectives now confirmed (at March 14 2024), particularly CC-02 (2) and CC-02 (5); CC-03(2) and CC-03(5)</p>	<p>Include reference to policy 6 and policy 7 in the matters of discretion, by Amending the clause as follows:</p> <ol style="list-style-type: none"> 1. Activity status: Restricted Discretionary <p>Where:</p> <ol style="list-style-type: none"> a. Compliance with any of the requirements of TEDZ-R1 and TEDZ-R2 cannot be achieved. <p>Matters of discretion are:</p> <ol style="list-style-type: none"> 1. Any relevant matters in TEDZ-P1, TEDZ-P2, TEDZ-P3, TEDZ-P4 , TEDZ-P6, TEDZ-P7 and TEDZ-P8; 2. The provision of an Event Management Plan, including details of traffic and noise generation from the proposed activity and how any effects of these will be managed; and 3. Management of effects on amenity values for adjacent Residential Zoned sites.

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Tertiary Education Zone	TEDZ-R5	Amend	<p>As stated in our submission 377 we had a concern that the second part of the rule in regards to controlled demolition activities does not effectively consider the potential significant local and wider environmental impacts of demolition activities within Wellington City.</p> <p>As such we suggest the addition of further consideration points that acknowledges these risks and the need for their minimisation.</p> <p>In clarifying what we were looking for in our earlier submission, it is the need to be satisfied that the required demolition plan includes management of potential run-off or release of ecotoxins or other environmentally hazardous substances.</p> <p>Ensuring that this is a matter for control will better ensure the Rule is giving effect to District Plan objectives now confirmed (at March 14 2024), particularly CC-02(2) and CC-03 (5)</p>	<p>Review, and where necessary Amend either this section, and/ or any other relevant section, e.g the requirements of a demolition management plan, to ensure that release or runoff of potential on-site ecotoxins or other environmental hazards is a matter over which council maintains control when considering demolition consents under this Rule.</p>

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Natural Open Space Zone				
He Rohe Ahoaho Māori Natural Open Space Zone	NOSZ-01	Amend	<p>As stated in our submission 377 we sought to include wording to seek that natural open space areas are managed in a way so as to improve water quality and enhance habitat recognising that many of these areas include ‘green’ and ‘blue’ corridors of importance to Wellington City.</p> <p>The reasons we seek inclusion of water quality and biodiversity are:</p> <p>Water quality is an issue in many of our urban streams, as is habitat for freshwater species. The Te Whaitua te Whanganui-a-Tara Whaitua Report (2022) the recommendations of which, as appropriate are being incorporated into the Natural Resources Plan identify a need for improvements to freshwater: a provision that enables the status quo to continue is insufficient, in our view, to help towards this.</p>	<p>Amend the first paragraph as follows:</p> <p>Natural open space areas are <u>predominantly</u> used by the public for <u>informal recreation activities</u>, within undeveloped natural areas, in such a way that protects, and where possible enhances, <u>water quality and biodiversity and</u> the predominant <u>character</u> and <u>amenity values</u> of the Natural Open Space Zone which include:</p>

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			<p>Biodiversity in Wellington city is one of our success stories. It is, however, reliant upon continued efforts to maintain the gains we have seen with its return: again, whilst we have had returns of many bird species, we have freshwater biodiversity species, such as giant kokopu and others threatened by pollution and barriers to fish passage.</p> <p>These matters are also noted in the Whaitua report recommendations.</p> <p>Furthermore, we believe these amendments will give better effect to District Plan objectives now confirmed (at March 14 2024), particularly CC-02(2) and CC-02 (6), NE-01, NE-02, NE-03, in particular NE-03(3) and NE-05.</p> <p>For all these reasons we seek that you include the words 'water quality and</p>	

Chapter / Sub-part	Specific provision / matter	Position	Reason for submission	Decision requested/ Relief Sought
			biodiversity' in the manner we are suggesting in this provision.	
<p>He Rohe Ahoaho Māori</p> <p>Natural Open Space Zone</p>	NOSZ-O2	Amend	<p>We believe the wording 'managed effectively' is ambiguous and insufficient in light of the current environmental issues facing Wellington City.</p> <p>In our view, the Long Term Plan outcomes, and a myriad of other council documents including its biodiversity strategy, along with, of course, relevant regional council documents such as the Regional Policy Statement and Natural Resources Plan all signal a need for continuing to improve the state of our environment, not simply maintain what is. For these reasons we consider 'manage effectively' to be wholly insufficient as it provides no clear legal basis upon which someone can decide what that is.</p> <p>However, in considering your reasons for rejection of our submission, we accept that our recommendation including use of the word 'avoid' may be too strong for the types of activities the open space zone</p>	<p>Amend the wording as follows:</p> <p>Adverse effects of activities and development undertaken in the Open Space Zone at the Zone interface and the surrounding area are avoided where practicable, remedied or mitigated.</p>

Chapter / Sub-part	Specific provision / matter	Position	Reason for submission	Decision requested/ Relief Sought
			<p>envisages and have modified the relief we are seeking accordingly.</p> <p>The amendment we recommend will give effect to the following WCC district plan objectives, now confirmed (at March 14 2024) including:</p> <p>District Plan Strategic Objectives CC-02 (2) AND CC-02 (6); NE-01, NE-02, NE-03, in particular NE-03(3) and NE-05.</p> <p>As presented to the hearings panel on Thursday March 21 2024, we believe what we are putting forward is also consistent with Wellington City Council’s Long Term Plan 2021-2031, and specifically:</p> <p>Vision "Wellington 2040 – an inclusive, sustainable and creative capital for people to live, work and play".</p> <p>Community Outcomes</p>	

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			<p>And the following two, of the four key Community Outcomes:</p> <p>Environmental A sustainable, climate friendly eco capital. A city where the natural environment is being preserved, biodiversity improved, natural resources are used sustainably, and the city is mitigating and adapting to climate change – for now and future generations.</p> <p>Social A people friendly, compact, safe and accessible capital city. An inclusive, liveable, and resilient city where people and communities can learn, are connected, well housed, safe and healthy.</p> <p>We have bolded some elements for emphasis.</p>	
<p>He Rohe Ahoaho Māori</p> <p>Natural Open Space Zone</p>	<p>NOSZ-P3</p>		<p>As stated in our submission 377, Natural open space areas are areas of recreation and activity: recognising that some reserves may have as part of their purpose provision for rural activities, this policy is appropriate. However, given the freshwater quality issues the City must</p>	<p>Amend the wording as follows:</p> <p>Only allow rural activities such as grazing or forestry where they are part of a management programme identified in the relevant reserve management plan for the area, and where specific provision is made to avoid, remedy or mitigate adverse effects on freshwater and native biodiversity.</p>

Chapter / Sub-part	Specific provision / matter	Position	Reason for submission	Decision requested/ Relief Sought
			<p>urgently address, and the importance the city and its communities are putting on enhancement of native biodiversity, we seek that this policy be reworded to specifically require a focus on water quality and biodiversity.</p> <p>The reasons we seek inclusion of water quality and biodiversity are:</p> <p>Water quality is an issue in many of our urban streams, as is habitat for freshwater species, and this is noted in the district plan issues descriptions. Furthermore, The Te Whaitua te Whanganui-a-Tara Whaitua Report (2022) the recommendations of which, as appropriate are being incorporated into the Region's Natural Resources Plan identify a need for improvements to freshwater. Therefore a provision that enables the status quo to continue is insufficient..</p> <p>Biodiversity in Wellington city is one of our success stories. It is, however, reliant upon continued efforts to maintain the gains we</p>	

Chapter / Sub-part	Specific provision / matter	Position	Reason for submission	Decision requested/ Relief Sought
			<p>have seen with its return: again, whilst we have had returns of many bird species, we have freshwater biodiversity species, such as giant kokopu and others threatened by pollution and barriers to fish passage.</p> <p>These matters are also noted in the Waitua report recommendations.</p> <p>Furthermore, we believe these amendments will give better effect to District Plan objectives now confirmed (at March 14 2024), particularly CC-02(2) and CC-02 (6), NE-01, NE-02, NE-03, in particular NE-03(3) and NE-05.</p> <p>For all these reasons we seek that you include the words 'freshwater' and 'biodiversity' in the manner we are suggesting in this provision.</p>	

Chapter / Sub-part	Specific provision / matter	Position	Reason for submission	Decision requested/ Relief Sought
<p>He Rohe Tuawhenua Whānui General Rural Zone</p>	<p>GRUZ Policies and Rules</p>		<p>As stated in our Submission 377, we had raised concerns about the potential for plantation forestry comprised of wilding species to become established without any adequate control, as the NES-PF upon which the council was relying, had known regulatory gaps, one of which was little to no control of wilding species.</p> <p>In addition, recent fires, e.g in Christchurch’s Port Hills are once again raising very real concerns about the placement of pine plantations near urban areas. With a changing climate likely to see more weather extremes, including wind, heat, and drought, this is a very necessary consideration for Wellington which stands to become more prone to wild fires.</p> <p>Since the time of writing our submission, and in seeing that the rationale for rejection of our submission is because the new National Environmental Standards for commercial forestry, which came into effect on 3 November 2023 is the reason,</p>	<p>Review, and as necessary amend all relevant clauses within the district plan to ensure that:</p> <ul style="list-style-type: none"> a) The correct version of the forestry NES is referred to - it should be National Environmental Standards for Commercial Forestry (November 2023) b) The term ‘plantation forestry’ is replaced with the term ‘commercial forestry’ and/ or c) The definition provided is consistent with the NES, e.g. explicitly including ‘exotic continuous-cover forests (carbon forests) to ensure that such forests greater than 1 ha are controlled through the NES-CF without the possibility of an unintended loophole enabling such forests to be established without consent and therefore risking wilding spread, fire and the other adverse environmental effects of exotic pine forests.

Chapter / Sub-part	Specific provision / matter	Position	Reason for submission	Decision requested/ Relief Sought
			<p>we instead are seeking a more straightforward consequential amendment.</p> <p>The new NES amends the national environmental standards for plantation forestry 2017, and now, in our view, provide sufficient safeguards on plantation forestry in respect of wilding species, along with a range of other improved controls on environmental risk, including slash.</p> <p>The NES-CF has also now extended its coverage to include carbon forests.</p> <p>However, without a consequential amendment to the wording defining a plantation forest in the District Plan, there is a risk there could be a loophole through which land owners could plant a carbon forest comprised of radiata pine, including using non-sterile species, by claiming they are not 'covered' by the NES-CF.</p> <p>To avoid any confusion, or risk a loop hole, we are now seeking consequential amendments to help ensure the District Plan is fully in line with the NES-CF by asking that the council also add into its wording 'exotic continuous-cover forests</p>	

Chapter / Sub-part	Specific provision / matter	Position	Reason for submission	Decision requested/ Relief Sought
			<p>(carbon forests) to ensure that carbon forestry is also picked up and controlled through the new Commercial Forestry NES.</p> <p>We believe that this will give better effect to the following district plan strategic objectives (now confirmed as at March 14 2024):</p> <p>District Plan Strategic Objectives CC-02 (2) AND CC-02 (6); CC-03 (2) and CC-03 (5), NE-01, NE-02, NE-03, in particular NE-03(3) and NE-05.</p>	
<p>He Rohe Ahoaho Open Space Zone</p>	<p>OSZ-O1</p>	<p>Amend</p>	<p>As stated in our submission 377, we acknowledge that Open space areas are used for a wide range of recreation activities. However, given the freshwater quality issues the City must urgently address, and the importance the city and its communities are putting on enhancement of native biodiversity, we seek that this policy be reworded to</p>	<p>Amend the objective to read:</p> <p><i>Open space areas are predominantly used by the public for a wide range of passive and active recreation activities, and may accommodate open space community activities, in such a way that maintains, and where possible, enhances water quality and biodiversity and the predominant character and amenity values of the Open Space Zone</i></p>

Chapter / Sub-part	Specific provision / matter	Position	Reason for submission	Decision requested/ Relief Sought
			<p>specifically require a focus on water quality and biodiversity.</p> <p>The reasons we seek inclusion of water quality and biodiversity are:</p> <p>Water quality is an issue in many of our urban streams, as is habitat for freshwater species, and this is noted in the district plan issues descriptions. Furthermore, The Te Whaitua te Whanganui-a-Tara Whaitua Report (2022) the recommendations of which, as appropriate are being incorporated into the Region's Natural Resources Plan identify a need for improvements to freshwater. Therefore a provision that enables the status quo to continue is insufficient..</p> <p>Biodiversity in Wellington city is one of our success stories. It is, however, reliant upon continued efforts to maintain the gains we have seen with its return: again, whilst we have had returns of many bird species, we have freshwater biodiversity species, such</p>	

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			<p>as giant kokopu and others threatened by pollution and barriers to fish passage.</p> <p>These matters are also noted in the Whaitua report recommendations.</p> <p>Furthermore, we believe these amendments will give better effect to District Plan objectives now confirmed (at March 14 2024), particularly CC-02(2) and CC-02 (6), NE-01, NE-02, NE-03, in particular NE-03(3) and NE-05.</p> <p>For all these reasons we seek that you include the words 'water quality' and 'biodiversity' in the manner we are suggesting in this provision.</p>	