#### The Tyers Stream Group; Proposed District Plan Hearing Stream 11, September 2024

- The Tyers Stream Group requests that the WCC Proposed District Plan provide for the protection of significant indigenous vegetation and significant habitats of indigenous fauna on all land including private residential land within Wellington City.
- 2. There is an obligation to be addressed arising from requirements of s 6 c of Resource Management Act, to recognise and provide for areas of significant indigenous vegetation and significant habitats of indigenous fauna. There are further requirements in the National Policy Statement on Indigenous Biodiversity and in Policy 24 of the Regional Policy Statement which requires district councils to protect all areas identified in accordance with policy 23 through provisions in their District Plan.
- 3. The Government is seeking to amend the NPSIB to change the obligation to protect SNAs, but has yet to do so. Even if they do, the obligations in RMA section 6 c, and the Regional Policy Statement remain. So, the question is how or to what extent, rather than whether some provision needs to be made.
- 4. There are many reasons to provide for biodiversity as outlined in the SNA Section 32 Economic Assessment Indigenous Biodiversity, 4 April 2024 by GHD. Where I disagree with GHD is with regard to the importance to the public of the public benefit of water management and the role that SNAs play in water management. Due in part to the recent Auckland floods, the "sponge city" concept and water management ideas are known about in the community. I would also note that Wellington is also somewhat deficient in the protection of its freshwater habitats due the difficulty of protection. In recent GWRC fresh water survey work, Tyers Stream had the highest MIC rating (River water quality: macroinvertebrate community index) in Wellington City in its upper catchment and the lowest rating in its lower catchment near the sea. This clearly shows the deficiency of fresh water SNA protection.

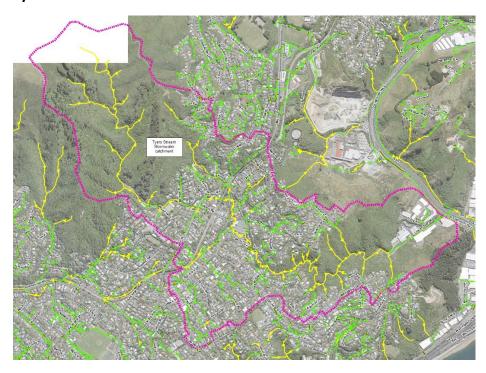
### GHD states in its report;

"Water management: Maintaining green space in urban areas has many benefits to manage water resources.

Natural areas can enhance water infiltration, reduce soil erosion, improve stormwater control and improve flood protection. This can benefit the wider community through increased resilience."

5. Policy to protect significant natural areas on private land is controversial due to the limiting of options for development, imposing costs on landowners in the public interest and being regarded as a constraint on private property rights. However, given many SNAs are on pieces of that that are less suitable for development (that's why they are undeveloped and still contain vegetation) so good incentives such as generous rates relief and reducing costs of allowable development can reduce controversy.

## **Tyers Stream Catchment**



# Tyers Stream Reserve and surrounds showing proposed SNAs and SNAs in residential areas



# **Tyers Stream Reserve and surrounds showing contours**

