

Submissions on the SNA provisions of the Proposed Waitomo District Plan

Submission no	Submitter	Support / in part / oppose	Plan section	Plan provision	Relief sought																														
06.01	Tim Stokes	Delete	Schedule 6 - Significant natural areas	SCHED6	Requests the removal of R160P040 from SCHED6.																														
06.02	Tim Stokes	Amend	Schedule 6 - Significant natural areas	SCHED6	Request removal of criteria number 5 from R16UP040.																														
06.03	Tim Stokes	Amend	PDP Maps	Map 4	Requests amendment to the northern boundary of R16U046.																														
10.155	Waikato Regional Council	Amend	Schedule 6 – Significant Natural Areas	General	Change the title for the final column of the table in Schedule 6 from 'WRC Karst' to 'Top 58 Karst SNA.'																														
10.156	WRC	Oppose	Schedule 6 – Significant Natural Areas	General	<p>Include the three sites listed below Schedule 6.</p> <table border="1"> <thead> <tr> <th colspan="6">Three sites missing from the table in Schedule 6:</th> </tr> <tr> <th>Site Code</th> <th>Site Name</th> <th>Criteria</th> <th>Significance</th> <th>Current text of the WRC Karst</th> <th>WRC Comments</th> </tr> </thead> <tbody> <tr> <td>R16P1703.9.01</td> <td>Taumatotora A5 North (NWR)</td> <td>1, 3, 5, 9, 11</td> <td>National</td> <td>Taumatotora karst and dolines</td> <td>Add 'Marakopa River natural tunnel and Te Ana Kapiti Cave' to WRC Karst column (See figure 1)</td> </tr> <tr> <td>R17074</td> <td>Marginal Strip - Managorongo Stream</td> <td>1, 3, 4, 5, 9, 11</td> <td>Regional</td> <td>Managorongo Gorge and natural bridges</td> <td>Add 'Ten Acre Tomo system' to WRC Karst column (See figure 2)</td> </tr> <tr> <td>S16UP074.02</td> <td></td> <td>1, 3, 5, 7, 8, 9, 11</td> <td>National</td> <td>Buakuri Cave</td> <td>Add 'Lake Botokawau' to WRC Karst column (See figure 3)</td> </tr> </tbody> </table>	Three sites missing from the table in Schedule 6:						Site Code	Site Name	Criteria	Significance	Current text of the WRC Karst	WRC Comments	R16P1703.9.01	Taumatotora A5 North (NWR)	1, 3, 5, 9, 11	National	Taumatotora karst and dolines	Add 'Marakopa River natural tunnel and Te Ana Kapiti Cave' to WRC Karst column (See figure 1)	R17074	Marginal Strip - Managorongo Stream	1, 3, 4, 5, 9, 11	Regional	Managorongo Gorge and natural bridges	Add 'Ten Acre Tomo system' to WRC Karst column (See figure 2)	S16UP074.02		1, 3, 5, 7, 8, 9, 11	National	Buakuri Cave	Add 'Lake Botokawau' to WRC Karst column (See figure 3)
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10.157	Waikato Regional Council	Oppose	Schedule 6 – Significant Natural Areas	General	<p>Include Criterion 5 from the WRPS Table 28 (Criteria for determining significance of indigenous biodiversity) in the 'Criteria' column for the following sites:</p> <ul style="list-style-type: none"> <li>• R16092</li> <li>• R16094.02</li> <li>• 16P1703/7</li> <li>• 16UP055.04</li> <li>• 1870439.03</li> <li>• 16UP074.01</li> <li>• 17UP143.01</li> </ul>																														
10.158	Waikato Regional Council	Oppose	Schedule 6 – Significant Natural Areas	General	<p>Include the 'Description of Values' column in Schedule 6 and reformat the information in this column so that it is easier to read and has a consistent layout.</p> <p>Alternatively, include an advice note above the table in Schedule 6 stating that further information relating to the biodiversity values of each site is available on request, including a link to the approach for requesting this information.</p>																														
10.159	Waikato Regional Council	Oppose	Schedule 6 – Significant Natural Areas	General	<p>Overlay the scheduled plan layers with the following GIS layers to ensure that there are no outstanding natural features missed by the PWDP:</p> <p>New Zealand Geopreservation Inventory, Outstanding Natural Features: <a href="https://naturemaps.nz/maps/#/viewer/openlayers/484">https://naturemaps.nz/maps/#/viewer/openlayers/484</a>.</p>																														
10.160	Waikato Regional Council	Amend	Schedule 6 – Significant Natural Areas	General	Include the site identified as a green polygon in the image below in Schedule 6.																														

					
15.01	Jeff Littin	Amend	Schedule 6. Significant Natural Areas	SCHED6 – R17001	Requests that the SNA boundaries be reviewed and redefined.
26.02	Waitomo District Council	Support with amendment	Maps	Significant Natural Areas R16UP0066	Amend the extent of the boundaries of SNA R16UP0066.
42.29	Ventus Energy	Oppose	Maps	Significant Natural Areas	Amend all maps to more accurately detail the location of SNA's.
42.30	Ventus Energy	Oppose	Maps	Outstanding Natural Landscapes	Amend all maps to more accurately detail the location of areas of Outstanding Natural Landscape and Character.
46.02	Federated Farmers	Oppose with amendment	Entire plan	Overlays, schedule sites, areas and features	Amend the plan in respect of overlays, scheduled sites and features identified on private property to: (a) Provide the opportunity for on-going mapping refinement and ground-truthing of scheduled sites, particularly SNAs including where a proposed activity requires a resource consent solely as a result of an area being identified as a significant natural area (SNA) and the site has not been ground-truthed, Council will meet the costs of the ground-truthing assessment to confirm the status and boundaries of the significant natural area. The assessment will be carried out by a Council approved suitably qualified and experienced ecologist prior to an application for resource consent being lodged. (b) ensure no changes are made to sites without landowner involvement.
47.191	Forest and Bird	Support	Schedule 6 Significant Natural Areas	General	Amend Schedule 6 Significant Natural Areas to include an advice note above the table alerting plan users that further information on biodiversity values for each site is available on request, and that a full assessment of values should be undertaken as part of a consent application process.  <u>To read: Within and beyond Schedule 6 areas, other criteria that are specifically listed against identified SNAs may also be met that were not apparent when significance assessments for Schedule 6 were undertaken.</u>  And  Any consequential changes or alternative relief to achieve the relief sought.
47.192	Forest and Bird	Oppose with amendment	Appendix 4 Offsetting framework	General	Delete Appendix 4 wording and replace with the following:  <u>The following sets out principles for the use of biodiversity offsets. These principles represent a standard for biodiversity offsetting and must be complied with for an action to qualify as a biodiversity offset:</u>  1 <u>Adherence to effects management hierarchy: A biodiversity offset is a commitment to redress any more than minor residual adverse effects and should be contemplated only after steps to avoid, remedy, or mitigate adverse effects are demonstrated to have been sequentially exhausted.</u>

					<p>2 <u>Limits to biodiversity offsetting: Many biodiversity values cannot be offset and if they are adversely affected then they will be permanently lost. Examples of where an offset would be inappropriate include where: (a) residual adverse effects cannot be offset because of the irreplaceability or vulnerability of the indigenous biodiversity affected; (b) effects on indigenous biodiversity that are uncertain, unknown, or little understood, but potential effects are significantly adverse; (c) there are no technically feasible options by which to secure gains within acceptable timeframe.</u></p> <p>3 <u>No net loss and preferably a net gain: The biodiversity values to be lost through the activity to which the offset applies are counterbalanced which is at least commensurate or exceeded by the proposed offsetting activity, so that the result is no net and preferably a net gain when compared to that loss. No net loss and net gain are measured by type, amount and condition at the impact site and offset site and is subject to an explicit loss and gain calculation.</u></p> <p>4 <u>Additionality: A biodiversity offset must achieve gains in indigenous biodiversity above and beyond gains that would have occurred in the absence of the offset, including that gains are additional to any remediation and mitigation undertaken in relation to the adverse effects of the activity. Offset design and implementation must avoid displacing activities harmful to indigenous biodiversity to other locations.</u></p> <p>5 <u>Like for Like: The ecological values being gained at the offset site are the same as those being lost at the impact site across types of indigenous biodiversity, amount of indigenous biodiversity (including condition), over time and spatial context.</u></p> <p>6 <u>Landscape context: Biodiversity offset actions must be undertaken where this will result in the best ecological outcome, preferably close to the location of development or within the same ecological district, and must consider the landscape context of both the impact site and the offset site, taking into account interaction between species habitats and ecosystem, spatial connections and ecosystem function.</u></p> <p>7 <u>Long-term outcomes: The biodiversity offset must be managed to secure outcomes of the activity that last at least as long as the impacts, and preferably in perpetuity.</u></p> <p>8 <u>Time lags: The delay between loss of indigenous biodiversity at the impact site and gain or maturity of indigenous biodiversity at the offset site must be minimised so that gains are achieved within the consent period.</u></p> <p>9 <u>Trading up: When trading up forms part of an offset, the proposal must demonstrate that the indigenous biodiversity values gained are demonstrably of higher value than those lost, and the values lost are not indigenous taxa that are listed as Threatened, At-Risk or Data deficient in the New Zealand Threat Classification System list, or considered vulnerable or irreplaceable.</u></p> <p>10 <u>Offset in advance: A biodiversity offset developed in advance of an application for resource consent must provide a clear link between the offset and the future effect. That is, the offset can be shown to have been created or commenced in anticipation of the specific effect and would not have occurred if that effect were not anticipated.</u></p> <p>11 <u>Proposing a biodiversity offset: A proposed biodiversity offset must include a specific biodiversity offset management plan.</u></p> <p>12 <u>Science and matauranga Māori: The design and implementation of a biodiversity offset must be a documented process informed by science, including an appropriate consideration of matauranga Māori.</u></p>
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47.195	Forest and Bird	Support with amendment	Maps	General comment	<p>Amend the maps to make the Significant Natural Areas layer more widely accessible than just on the WDP online GIS maps.</p> <p>And</p> <p>Any consequential changes or alternative relief to achieve the relief sought.</p>
51.51	KiwiRail Holdings Limited	Support with amendment	SCHED6 Significant natural areas		<p>That the Proposed District Plan Maps are Amended to remove the Significant Natural Area overlay from KiwiRail's corridor designations (as listed under "KR 01 in the Designations schedule).</p>