

# Proposed Thames-Coromandel District Plan



## Variation 3 - Taiwawe Catchment Structure Plan

### Submission Form

Form 5 Clause 6 of the First Schedule to the Resource Management Act 1991

#### Your submission can be:

**Posted to:** Thames-Coromandel District Council  
Proposed Thames-Coromandel District Plan Variation 3  
Private Bag, Thames 3540  
**Attention:** Policy and Planning Team

**Email to:** [customer.services@tcdc.govt.nz](mailto:customer.services@tcdc.govt.nz)

**Delivered to:** Thames-Coromandel District Council, 515 Mackay Street, Thames  
**Attention:** Policy and Planning Team  
(or to the Area Offices in Coromandel, Whangamata or Whitianga)

#### Submitter Details - Address for Service

Full Name(s) Adele Smaill

Organisation (if relevant) n/a

Email address smylla@slingshot.co.nz

Postal address 903 Purangi road, Cooks Beach, RD1, Whitianga 3591

Phone Number (include area code) (07 ) 8664551

Mobile Number 021-2016625

*Our preferred method of corresponding with you is by email.*

**Submissions must be received no later than 5 pm, Friday 28 August 2020**

If you need more writing space just attach additional pages to this form.

#### PRIVACY ACT 1993

Please note that submissions are public information. Information on this form including your name and submission will be accessible to the media and public as part of the decision making process. Council is required to make this information available under the Resource Management Act 1991. Your contact details will only be used for the purpose of the Proposed District Plan process. The information will be held by the Thames-Coromandel District Council. You have the right to access the information and request its correction.

## Your Submission

*The specific provisions of Variation 3 - Taiwawe Catchment Structure Plan that my submission relates to are:*


**My submission is:**

(clearly state whether you SUPPORT or OPPOSE specific parts of Variation 3 - Taiwawe Catchment Structure Plan or wish to have amendments made, giving reasons for your view)

I support  oppose  the above plan submission.

**Decision sought from Council:**

(clearly state what you want the Council to do, eg: retain, amend, delete)

Decline this application.

**Reasons for my submission:**

See attached

## Proposed District Plan Hearing

I wish to be heard in support of my submission.  Yes  No

If others make a similar submission, I will consider presenting a joint case with them at a hearing.  Yes  No

Signature of submitter:
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Date:
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Person making the submission, or authorised to sign on behalf of an organisation making the submission.

## Trade Competition

*Please note that if you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by Clause 6 of Schedule 1 of the Resource Management Act 1991.*

I could gain an advantage in trade competition through this submission.  Yes  No

If you could gain an advantage in trade competition through this submission please complete the following:

*I am directly affected by an effect of the subject matter of the submission that –*

- a) adversely affects the environment; and
- b) does not relate to trade competition or the effects of trade competition.  Yes  No

*If you require further information about the Variation please visit the Council website [www.tcdc.govt.nz/variation3hotwaterbeach](http://www.tcdc.govt.nz/variation3hotwaterbeach)*

THAMES-COROMANDEL DISTRICT COUNCIL  
Private Bag, 515 Mackay Street, Thames 3540  
phone: 07 868 0200 | fax: 07 868 0234  
customer.services@tcdc.govt.nz | www.tcdc.govt.nz



Variation 3: Proposed Taiwawe Catchment Structure Plan  
Attachment to submission form

**The application provisions** I oppose relate in particular to: “proposed structure plan 30/4/20 author unknown - 27.9.2 PURPOSE: The purpose of this structure plan is to create a conservation framework focused on the enhancement and protection of the ecological values and indigenous biodiversity of the Taiwawe Stream and its tributaries to provide a context for low density residential and rural lifestyle development.

To achieve this purpose: “Restoration and protection of ecological values and enhancement of indigenous biodiversity of indigenous bush, riparian margins, wetlands and steep or potentially unstable land, within conservation areas shall be carried out to create a framework for a low density residential subdivision and development;

(iii) Isolated remnants of regenerating indigenous vegetation, together with indigenous vegetation in riparian margins of the Taiwawe Stream and its tributaries, shall be protected within a conservation area that is held in private ownership; and

(iv) Rehabilitation, restoration, enrichment and buffer planting of indigenous vegetation shall be implemented within areas identified for conservation which shall include steep and eroding land;

(v) Conservation measures to be implemented shall include on going pest (animal and plant) control programmes and re mediating barriers to fish migration;” (abridged)

**Reasons:** 1) Lack of detail in the “conservation framework” or elsewhere in the documentation provided. This suggests minimal knowledge of, or possibly commitment to, the complexities of avoiding, remedying and mitigating adverse environmental impacts in this location. Using such a significant legal requirement as a “means to an end” does not inspire confidence. There are many other local subdivisions in ecologically sensitive locations that have also sounded good on paper but fail in their stated, and sometimes covenanted, obligations. Monitoring and compliance are difficult without commitment from property developers and purchasers.

2) Adverse environmental impacts of such intensive housing in this location include predation of threatened native species by unconstrained dogs, fragmentation of habitat including “wildlife corridors”, inadequate plant and animal pest control including the probable introduction of new invasive species, additional noise and disturbance, increased risk of contamination and over-load of waterways.

Dogs are known significant predators of adult and juvenile kiwi. Increasing residential development adjacent to known kiwi habitat will undoubtedly increase the risk to kiwi. Referring to the “Ecological Report page 33”, little mention is made of this and no intensive bird surveying was done including at night. In the same report the banning of dog ownership is described as “onerous”. This is a demonstration of the glib manner these applicants are taking this particular issue as is recommending dogs be kept on leashes which is naive, unenforceable and impractical. No mention is made of the use of “kiwi avoidance training” which is a well known education tool for both dogs and owners or dog fencing properties.

Banning cats is a good idea but equally no detail is given on how this would be implemented, enforced and monitored.

Fragmentation of natural habitat occurs when these areas are separated by housing, disturbance, cleared areas, drainage, lighting, roading etc. These uses can prevent species travelling between ‘fragments’ or endanger them when they do and many native species rely on an integrated natural community. This includes shading, forest litter, decaying materials, protected edges, darkness, quiet, adequate buffering etc. Not always achieved within “low density residential and rural lifestyle development”.

Plant and animal pest control requires specialist knowledge to be effective and an integrated well-funded approach which requires long-term time commitment. Gardeners and landscapers often introduce new plant species to an area without knowledge of the ability of these to spread beyond

the garden confines. As the climate changes, new species have more devastating potential. More detail as to how these measures would be implemented is required.

Freshwater values for this catchment are well described and “Waikato Regional Council” monitoring suggests this is already vulnerable to pollution from sediment, faeces and over-loading in high rain events. Any increases in housing needs to be very carefully managed. More detail as to how this would be implemented is required.

3) The applicants definition of a “low density residential and rural lifestyle development” is interesting. The proposed intensity will, almost, double the amount of housing in the Hot Water Beach settlement, with the potential to, almost, double the adverse effects. The term “rural lifestyle” also causes concern with a probable increase in domestic animals that compromise conservation efforts both on site and further afield, for example, pet goats, ducks and rabbits are common inhabitants of such local land use with escape inevitable.

4) The example that would be made if Council were to grant this Variation could lead to neighbouring property owners also applying for further intensification of housing in this catchment and nearby. We already see this with the applicant using the adjacent subdivision as a “precedent” for allowing this one.

5) I am very concerned that the proposed structure plan would over-ride other rules wherever there is conflict (pg 11 Landscape Report). This seems a dangerous precedent.

**Recommendations:** the current proposal be declined.

Any true benefits will only follow a re-working of the subdivision concept and plan including reducing and clustering housing and roading into one area low down on the site. This would leave larger areas to be more wholistically restored and maintained, adding true ecological value. This would need a detailed plan for restoration and long-term maintenance including covenanting, costings, techniques, landscaping, eco-sourcing, monitoring etc. “Eco-subdivision” purchasers would be more likely to be committed to the desired core values including no domestic pets, sustainable housing, restricted garden species and ongoing maintenance.

Adele Smaill

smylla@slingshot.co.nz

903 Purangi Road, Cooks Beach, RD1, Whitianga 3591