

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

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) Blair Albert Saunders and Jean Suanders

Organisation (if relevant) _____

Email address tepuialodge@hwb.co.nz

Postal address 14 Pye Place, RD1, Whitianga 3591

Phone Number () _____
(include area code)

Mobile Number +64 21 089 42668

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:

27.9.5 TAIWAWA CATCHMENT STRUCTURE PLAN RULES / RULE 1 SUBDIVISION creating one or more lots
1. Subdivision creating one or more lots is a Restricted Discretionary Activity provided: In Development Areas 1 shown on Diagram A the following standards shall apply: a) Up to, but not exceeding 45 lots;

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)

Additional pages attached.

Reasons for my submission:

Additional pages 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:



Date: 26 August 2020

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

THAMES-COROMANDEL DISTRICT COUNCIL
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28/08/2020

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14 Pye Place RD1
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New Zealand
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021 089 42668

To whom it may concern,

We oppose the proposal of “a) Up to, but not exceeding 45 lots”.

27.9.5 TAIWAWA CATCHMENT STRUCTURE PLAN RULES

RULE 1 SUBDIVISION creating one or more lots 1. Subdivision creating one or more lots is a Restricted Discretionary Activity provided: In Development Areas 1 shown on Diagram A the following standards shall apply: a) Up to, but not exceeding 45 lots;

FLORA AND FAUNA

As the owners of adjacent property Lot 2 DP 475658 we are serious about protecting the native flora and fauna of this area. Our property is home to an **extensive kiwi population**. The Ecological Assessment by Wildlands Consultants Ltd clearly indicates that impacts of 45 lots as proposed in the Taiwawe Catchment Structure Plan would be detrimental to the neighbouring properties as follows:

10.4 Predation of indigenous fauna by domestic pets:

A study by Morgan et al. (2007) suggests that domestic cats will exploit local wild areas, usually if a cat's home-site is adjacent or very close by. **The close proximity of the proposed development to large areas of indigenous forest means that a range of indigenous fauna species are at risk of predation by cats**, including birds, reptiles, invertebrates, and potentially long-tailed bats.

10.6 Introduction of pest plant species:

Residential gardens are potentially a major source of invasive plants for adjacent areas of indigenous habitats (Sullivan et al. 2005). **The presence of up to 45 new residences in close proximity to existing indigenous vegetation presents a risk of introducing pest plant species into indigenous habitats.**

DEPARTURE FROM RURAL CHARACTER

The proposal of the Taiwawe Catchment Structure Plan to create **45 lots with a minimum size of 2500m² will not retain the rural character of the area**. 45 new residences and numerous inhabitants will create significant noise, visual impact, light spill, septic pollution, stormwater run-off, traffic, refuse and recycling. This would cause **significant negative impacts on the rural character of our property and lifestyle**. This **does not comply** with the proposed Thames-Coromandel District Plan as follows:

Policy 5a: Settlement development and growth including commercial, housing and subdivision design **should be consistent with the existing character and context of the built environment** and with the landscape character, historic heritage and amenity values of the area.

Policy 10h - Hot Water Beach: Hot Water Beach should have no industrial, residential or commercial expansion except for home businesses, self-serviced lots of a rural

character and small-scale retail activities servicing beach visitors. **Development and growth shall not occur where it increases demand for additional water, wastewater, stormwater and roading network infrastructure.**

Section 16 – SUBDIVISION Policy 1c: Subdivision in the Rural Zone **shall maintain the open space character of the Rural Area.**

VISUAL IMPACT

Extensive views of the proposed development will be clearly seen from many locations throughout our property. The Landscape Assessment states that we will “experience minimal exposure to the proposed development” even though “...no photographs were taken from within the grounds of private properties located within the immediate vicinity of the subject site.” **The magnitude of change to our existing view of the north-western corner of 104 Taiwawe Lane will be high due to the density of the development proposed. This will be an extreme change to the rural character the area and will not be consistent with immediately neighbouring properties** as is proposed here:

4.4.3 Landscape & Rural Amenity Aspects

...development within the northern valley base provides an existing landscape character incorporating current settlement forms that include the holiday campground. **A potentially increased density of future dwellings within this portion of the site would be consistent with this character...**

TRAFFIC

The subdivision will cause considerable negative impact on the access to our property via the right of way and the intersection between our ROW and Hot Water Beach Road. The ROW and intersection are already extremely dangerous and 45 new residences will put significant pressure on this infrastructure. **The Transport Assessment provided by Traffic Planning Consultants Ltd is outdated and incomplete.** The projected calculations of vehicle numbers are invalid as many important factors have not been considered. Their conclusion that the proposed Taiwawe Catchment Structure Plan is acceptable from an overall transportation point of view **should be peer reviewed.** They have not considered these important factors:

- new intersection configuration,
- the necessity of surveying the intersection at peak time to be able to accommodate the extreme increase in vehicle numbers,
- vehicle numbers for all the properties accessed by the right of way,
- traffic congestion given the proximity to the one lane bridge,
- the tendency of tourist drivers to enter the right of way on the right hand side of the road,
- the increased volume of commercial vehicles, including delivery and concrete trucks, for a number of years as houses are built,
- the location of an additional 45 mailboxes, recycling bins, glass bins, and refuse bags.

Oppose: 45 lots, minimum size 2500m²

Amend to: 10 lots, minimum size 10,000m²

Include: A total ban on domestic cats and annual kiwi avoidance training for dogs in perpetuity.

We oppose the inclusion Section A (Figure 2: Site Interior Landscape Units) being included in the Development Area (Diagram A).

FLOODING

Section A (the area adjacent to, and north-west of Ngatuturu Lane) comprises of alluvial flats, swampy ground and wetland that are **regularly subject to flooding**. Flooding is outside of the scope of the Geotechnical Assessment by Earthtech Consulting Ltd but it will pose an extreme risk of septic pollution into the groundwater and bordering Taiwawe Stream if this area is developed as proposed. The Ministry For The Environment states that “although on-site wastewater systems are usually not seen as the main cause of pollution, they can and do **contribute significantly to the deterioration in water quality in areas with sensitive environments or high densities of on-site systems.**” Development of Section A is questionable when considering the likelihood of flooding and the following points from the Geotechnical Assessment for Structure Plan by Earthtech Consulting Ltd:

4.3 Groundwater Conditions: On the alluvial flats, the groundwater table is expected to be within 1m of the ground surface based on the **0.7m groundwater depth** in HA109 and the depth of the existing agricultural drains.

5.4 On-Site Effluent Disposal: Specific design of effluent disposal areas on the alluvial flats associated with Development Area 2 is expected to be required to incorporate low soakage capacity of the alluvial clay and silt soils and high winter groundwater levels (within 1m of ground surface). These **effluent disposal areas need to be located outside of surface water flow paths and potential flooding areas.**

WETLAND HABITAT / ECOLOGICAL CORRIDOR

The Ecological Assessment by Wildlands Consultants Ltd doesn't report the **many resident kiwi, kereru, and rare and endangered bittern**. Residential development of Section A will put extreme pressure on the endangered bittern that inhabit the area. New Zealand Birds Online state that ongoing **habitat loss** is still considered one of the greatest threats to Bittern. **Section A should be restored to wetland to strengthen the ecological corridor** connecting ours and neighbouring properties to the Whenuakite Kiwi Recovery Area and the regenerating wetlands south of Hahei. Including Section A as conservation block in the Taiwawe Catchment Structure Plan will ensure the following objective is realised:

27.9.4 Objective & Policies 1: Protect and enhance regenerating indigenous vegetation and habitat value of high natural character **along stream margins, wetlands and springs, and restore ecological values by creating corridors to connect fragmented areas of indigenous vegetation and to enhance biodiversity.**

This is supported by the Landscape Assessment by Kerstie van Zandvoort as follows:

2 Baseline Environment 2.1 Landscape Context: ...both its east and west **neighbours** are distinguished by being predominantly **covered in native bush which is contiguous with adjoining properties extending to the south of Hahei.**

... its immediately adjacent neighbours remain predominantly under a bush cover. With **large tracts of bush extending into adjacent inland properties** beyond the site's east and west neighbours...

CONNECTION TO SURROUNDING ENVIRONMENT

Development of Section A does not connect with the surrounding environment and community or conform to the settlement pattern established by existing residential development at the western end of 104 Taiwawe Lane. The development of high density lots in the north-western corner of the property is not in keeping with the rural character and size of the neighbouring properties. The majority of our **current neighbouring properties are very large blocks with extensive native bush. The high density and small size of the proposed lots** in the north-western corner of the property **will be a clear departure from the current rural character** of the area. This **does not comply with the proposed Thames-Coromandel District Plan** as follows:

4.4 General Design Principles Design should ensure that:

5 The subdivision connects with the surrounding environment and community.

This is supported by the Landscape Assessment by Kerstie van Zandvoort as follows:

4.2.2 Indirect Landscape Effects: Landscape Characteristics, Attributes & Values

"...it is important that the relative density and proposed distribution of residential development within this area maintains the intimate scale of this rural valley landscape, which is otherwise isolated from built structures."

This is also supported by the proposed Thames-Coromandel District Plan as follows:

S.15 - DEVELOPMENT & GROWTH 15.2 Issues: **Poorly planned development can degrade the special values of an area by diminishing biodiversity, natural character, disrupting ecological corridors between ecosystems**, restricting access to water bodies, compromising landscapes and degrading historic heritage features and amenity values.

Oppose: Development of Section A including Development Area 2

Include: Section A as Conservation Area in perpetuity

Include: Minimum size of lots 10,000m²

We oppose the proposal to create a public walking track on the boundary of Taiwawe Stream.

We do not want development of a public walkway on our shared stream boundary. We feel this would be a critical detraction to the rural character of our property that would impose a negative impact on our privacy and security. This would pose an extremely increased risk of illegal trespass, hunting, Kauri dieback disease and fire. And will risk serious potential impacts to indigenous flora, fauna and water quality of Taiwawe stream.

Oppose: Proposal of a public walkway on Taiwawe Stream boundary

Include: The Taiwawe Stream boundary is to remain private access only.

References

Earthtech Consulting Ltd (2019) *Geotechnical Assessment for Structure Plan*

Ministry For The Environment (2020) *What is the problem?* Retrieved from: www.mfe.govt.nz/publications/rma/proposed-national-environmental-standard-site-wastewater-discussion-document/3-what Retrieved 27 August 2020

New Zealand Birds Online (2020) *Australasian Bittern* Retrieved from: <http://nzbirdsonline.org.nz/species/australasian-bittern#:~:text=Ongoing%20habitat%20loss%20is%20still,be%20contributing%20to%20population%20declines>. Retrieved 27 August 2020

TCDC (2019) *Proposed Thames-Coromandel District Plan - Appeals Version*

Traffic Planning Consultants Ltd (2018) *Transport Assessment*

van Zandvoort, K (2019) *Landscape Assessment*

Wildlands Consultants Ltd (2019) *Ecological Assessment of a Proposed Structure Plan for 790C Hot Water Beach Road*

Ngā mihi,

The image shows two handwritten signatures in black ink. The first signature is a stylized, cursive 'B' followed by 'A', representing BA Saunders. The second signature is a cursive 'J' followed by 'Saunders', representing J Saunders.

BA Saunders and J Saunders