

Proposed Thames Coromandel District Plan

2 March 2014

Submission by Trif Sitnikoff

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I have some concerns I would like considered for the upcoming Thames Coromandel District Plan. I care deeply about the Coromandel Peninsula, both its natural environment and the people that live here. I believe we need to have robust legislation to protect this environment and the values of its residents.

The areas that concern me are Section 9 Landscapes, Section 12 Contaminated Land and Hazardous Substances, Section 14 / 37 Mining Activities and Section 32 Natural Character. I am concerned that activities such as mining or coastal development have the potential to irrevocably change the beautiful character of the landscape. The Coromandel is full of public spaces that have an intrinsic value that cannot be enhanced through development and shouldn't be changed for profit.

Recreational Opportunities

I am involved in educating teenagers about the benefits of enjoying the outdoors in a safe and responsible manner. The Coromandel is a world class playground and the local activities which the school can enjoy include sailing, white water kayaking, sea kayaking, mountain biking, tramping, trail running, canyoning, abseiling, rock climbing, swimming, snorkeling and diving.

A significant part of the schools outdoor programme is discussing how we can be guardians of the environment. We talk about some of the damage that has been done in the Coromandel from environmental abuse such as the silting up of the Firth from forestry and mining, the barren fish stocks outside of the marine reserves and the contamination of the soil from mining. The environment is recovering and it would be irresponsible to slow this process down or go backwards. The communities of the Coromandel need strong leadership to inspire us all to be custodians of the environment.

The Environment is our Economy

I have had countless interactions with visitors to the Coromandel as a guide, passing them on a track or sitting with them at a swimming hole. The Coromandel is full of postcard scenery that is becoming world famous. There are so many businesses and families that make a living from tourism and this income is sustainable; it will exist as long as the scenery does. In my mind mining is a

shortsighted benefit for very few and developing coastal land benefits even fewer. There is far more potential in expanding tourism than plundering nature.

There is too much to lose with the risky practices of mining and the people responsible are too far removed from the reality of the mess they create such as \$17 million taxpayer dollars to make the Te Aroha tailings dam safe and the recent arsenic scare in Moanatairi. Does the District Plan recognize the adverse impact that mining has had on the Coromandel Peninsula? I think that mining should be removed from section 37.3 permitted activities and that 37.4 should be amended to read that mineral processing, surface mining, underground mining, waste/tailings storage, prospecting and exploration are prohibited.

The Coromandel Peninsula has a bright future with a new generation of environmental guardians emerging. However this future needs to be guaranteed by protecting the environment and community from the harmful effects of mining and coastal development. I would like to thank the TCDC for the opportunity to submit on the Proposed District Plan and I would speak on my submission or would consider presenting a joint case with others who have made a similar submission.

Yours sincerely,

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**NOTICE OF SUBMISSION TO THE PROPOSED THAMES COROMANDEL
DISTRICT PURSUANT TO CLAUSE 6 OF THE FIRST SCHEDULE OF THE
RESOURCE MANAGEMENT ACT 1991**

To: Thames-Coromandel District Council
Proposed Thames-Coromandel District Plan
515 Mackay Street
Thames 3540
Attention: District Plan Manager

customer.services@tcdc.govt.nz

Submitter: MATARANGI RATEPAYERS ASSOCIATION
INCORPORATED (Referred to in submission as MRAI)

Address for Service: THE SECRETARY MATARANGI RATEPAYERS
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**THIS IS A SUBMISSION BY THE MATARANGI RATEPAYERS
ASSOCIATION TO THE THAMES COROMANDEL PROPOSED DISTRICT
PLAN**

1.0 BACKGROUND

Matarangi Ratepayers Association Incorporated (MRAI) represents Matarangi Ratepayers and the interests generally of the permanent and temporary population of Matarangi. MRAI has a current membership of approximately 300 and since 2001 has had regular involvement in statutory planning matters and has consulted with Thames Coromandel District Council (TCDC) on matters such as reserves management and infrastructure operation.

Matarangi has a permanent population of around 350 people. On weekends, holiday periods and especially over the Christmas / New Year period this population increases considerably, with the population peaking at around 7000. Matarangi is an example of a resort township where the demands of peak population require a significantly higher level of infrastructure than is necessary for large parts of the year. At Matarangi peak demand on water, sewerage and recreational infrastructure is up to 20 times greater than the base demand from the permanent population.

The development of Matarangi has been provided for in various planning documents dating from the 1970's. It is especially significant that in all of these documents development has been predicated on the concept that neighbourhood cells of housing should be surrounded by sizeable areas of public or private open space. This open space philosophy has been incorporated into each of the last three District Plans - the Coromandel District Plan Operative (1977), the Thames Coromandel Transitional Plan (Notified 1986 and Operative 1990) and the Thames Coromandel District Plan (Operative 2010).

This submission which relates to the Proposed Thames Coromandel District Plan [PTCDP] (notified December 2013) focuses on two main concerns – the continued protection of existing open space and recreational opportunities and the provision of appropriate open space and recreational opportunities with all future development.

The requirements for infrastructure services such as water supply and sewage disposal at Matarangi have been clearly recognised and provided for through infrastructure standards, in the various District Plans applicable over the years. Provision has also been made for open space protection and opportunities for recreational activities in each of these planning documents.

However, unlike water and sewage infrastructure, which have become Council owned assets, open space and opportunities for recreation have been provided with a mix of Council owned reserve land, and privately owned land. The privately owned open space, which is used for a range of activities including tennis, golf and water storage, has been an integral part of each approved stage of development at Matarangi. Until relatively recently, this land has been owned by the development company controlling the remaining supply of undeveloped land at Matarangi. It has therefore been very much in the interests of the developer to retain and maintain the private open space as a selling point for future section releases.

Now with the ownership of private open space and the future development land divided between different landowners (and potentially likely to become further divided), it is considered important to ensure that the new District Plan confirms that there should be no expectation of development of this existing private open space. It is also vital to ensure with all future residential development at Matarangi, that the

appropriate level of open space is provided, that the open space is in relevant locations and that where the open space remains in private ownership, techniques are utilised to clearly provide for its permanent protection and for continuity of public access.

1.1 THE SPECIFIC PROVISIONS OF THE PTCDP THAT THE MRAI SUBMISSION RELATES TO ARE SUMMARISED AS FOLLOWS:

General Support in Principle

- (a) SECTION 27: MATARANGI STRUCTURE PLAN
- (b) SECTION 50: OPEN SPACE ZONE AND RELATED MAPS 12B AND 12C

Opposition to Particular Provisions of the PTCDP

- (a) SECTION 27: MATARANGI STRUCTURE PLAN

27.3.1 Description

27.3.2 Purpose

27.3.4 Objective 1

27.3.4 Policy 1a

27.3.4 Policy 1b

27.3.4 Policy 1f

27.3.4 Objective 2

27.3.4 Policy 2a (b)

27.3.5 Matarangi Structure Plan Rules

Rule 1.1(a)

Rule 3.3

Rule 4.1

Rule 4.1.1

Rule 4.1 (b)

Rule 4.1 (g)

New Rule Required in 4.1

Rule 4.2

Rule 4.3

27.3.6 Assessment Matters and Criteria

Table 2 – Controlled Activity Matters

Item 2Table 3 – Restricted Discretionary Activity Matters
Item 2cDiagram ANew Diagrams F and G Required

(b) SECTION 50: OPEN SPACE ZONE

50.1 Zone Description

50.2 Zone Purpose

50.6 Non-Complying Activities

(c) SECTION 38: SUBDIVISION RULES

(d) SECTION 3: DEFINITIONS

1. THE MRAI WISHES TO BE HEARD IN SUPPORT OF THIS SUBMISSION
2. IF OTHERS MAKE A SIMILAR SUBMISSION, THE MRAI WOULD BE PREPARED TO CONSIDER PRESENTING A JOINT CASE AT ANY HEARING.
3. THE MRAI COULD NOT GAIN AN ADVANTAGE IN TRADE COMPETITION THROUGH THIS SUBMISSION.
4. THE MRAI IS 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.

Signed on and behalf of MRAI

.....

K.R. Cullum

Dated this day of 12th day of March 2014

2.0 SUPPORT FOR THE PROPOSED DISTRICT PLAN

SECTION 27: MATARANGI STRUCTURE PLAN

Submission in Support

- 2.1 MRAI supports the concept of the Matarangi Structure Plan to manage activities within the Structure Plan area and also supports the extension of the Structure Plan to include the area of land encompassed by Holes 1 and 2 of the golf course**

Reason

The development of Matarangi as a holiday settlement has required the use of specialised techniques to enable an intensive beach township to be accommodated on a fragile sandspit. The Structure Plan approach is considered to be the most appropriate technique, although a number of alterations are proposed in later parts of the MRAI submission to ensure that the Structure Plan can deliver better outcomes. Inclusion of Holes 1 and 2 of the golf course within the Structure Plan is considered appropriate in view of the history of this land within the Matarangi development process. It is not proposed to elaborate further on this matter in this submission as this will be covered in more detail by other submitters.

Relief Sought

That the Matarangi Structure Plan continue as the principal technique for managing change and development at Matarangi and the area encompassing Holes 1 and 2 of the golf course (Lot 36 DPS 72837) be included within the boundary of the Structure Plan.

SECTION 50: OPEN SPACE ZONE AND RELATED MAPS 12B AND 12C

Submission in Support

- 2.2 MRAI supports the zoning of the area occupied by the Matarangi Golf Course as 'Open Space'.**

Reason

The zone gives effect to the intention of the proposed Matarangi Structure Plan, and to previous versions of the District Plan, to retain the area occupied by the golf course as structuring open space, separating compartments of residential development.

Relief Sought

That the Open Space zoning over all land occupied by the Matarangi golf course be retained.

3.0 OPPOSITION TO THE PROPOSED DISTRICT PLAN AND PROPOSALS FOR MODIFICATIONS

SECTION 27: MATARANGI STRUCTURE PLAN

27.3.1 Description

Submission in Opposition

The introductory wording to the Structure Plan is generally supported as it outlines the basis on which the Structure Plan area has evolved to provide the appropriate mix of residential development and open space at Matarangi. However one part of the present wording is considered to be inaccurate. Consent notices may be a means of providing for public access in future, but at present they are not applicable to privately owned land, including the golf course.

Relief Sought

Delete

~~In the Structure Plan, the term “open space” includes the Open Space Zone and any of the following that are publicly or privately owned, but publicly accessible through a consent notice:~~

Replace with

In the Structure Plan, the term “open space” includes the Open Space Zone and any of the following that are publicly or privately owned, but publicly accessible whether or not a charge is made:

27.3.2 Purpose

Submission in Opposition

The statement of purpose is generally supported but the wording in relation to new development needs to more explicitly identify the need to provide for a high standard of dedicated pedestrian linkages to the ocean, the harbour, the commercial centre, other neighbourhood cells and to recreational opportunities.

Relief Sought

Delete

~~New development will be based around Whangapoua Harbour with distinct neighbourhood cells defined by areas of open space. There will be strong pedestrian connections to existing development, other neighbourhood cells, recreational opportunities, protection of the Coromandel Ranges visual backdrop and enhancement of the natural character of the Whangapoua Harbour.~~

Replace with

New development will be based around Whangapoua Harbour with distinct neighbourhood cells defined by areas of open space. There will be enhancement of the natural character of the Whangapoua Harbour coastline, protection of the Coromandel Ranges visual backdrop and strong and dedicated pedestrian

connections to the ocean, the harbour, the commercial centre, other neighbourhood cells and to recreational opportunities.

27.3.4 Objective 1

Submission in Opposition

Objective 1 requires rewording to more accurately reflect the situation with the status of the existing open space between neighbourhood cells.

Relief Sought

Delete

~~Matarangi remains a high amenity settlement based on neighbourhood cells defined by areas of publicly accessible open space.~~

Replace with

Matarangi remains a high amenity settlement based on neighbourhood cells defined by areas of public and private open space.

27.3.4 Policy 1a

Submission in Opposition

Policy 1a is insufficient and should be amended to provide for

- (i) A revised Diagram A and new Diagrams F and G that indicate a conceptual layout for Key Pedestrian Connections that achieve the Purpose set down in revised Clause 27.3.2.
- (ii) A more appropriate scale of park to the west of the existing commercial centre.

Relief Sought

Delete

~~Subdivision and development of the Structure Plan area shall be in accordance with Diagram A and implement the concepts for open space in Diagrams B, C, D and E for open space adjacent to the Whangapoua Harbour.~~

Replace with

Subdivision and development of the Structure Plan area shall be in accordance with Diagram A and implement the concepts for open space in Diagrams B, C, D, E, F and G.

Policy 27.3.4 Policy 1b

Submission in Opposition

Policy 1b is insufficient and should

- (i) Provide a clearer statement on the provision of open space linkages throughout the whole of the Structure Plan area still available for development.

- (ii) Make specific reference to provision of a community park near the commercial centre.

Relief Sought

Include the following new sub- policy 1b(h) [possibly to be re-ordered].

Provide dedicated pedestrian connections to the ocean, the harbour, the commercial centre, other neighbourhood cells, and to recreational opportunities as indicated.

Include the following new sub-policy 1b(i) (possibly to be re-ordered)

Provide a community park in the area to the west of the existing commercial centre.

27.3.4 Policy 1f

Submission

Policy 1f is insufficient and should be amended to make clear that a minimum proportion of 40% open space to 60% residential land should continue to apply to each future stage of development within the Structure Plan area.

Relief Sought

Delete

~~To maintain the existing character within the structure plan area, the proportion of open space to residential land shall be at least 40% open space to 60% residential land.~~

Replace with

To maintain the existing character within the structure plan area, the proportion of open space to residential land shall be at least 40% open space to 60% residential land and this ratio shall be applicable to each future stage of subdivision.

27.3.4 Objective 2

Submission in Opposition

Objective 2 is not an accurate statement of the current situation and should be amended to more accurately reflect the nature of public access to the golf course. Access to the golf course may be by way of a charge and the objective should recognize this.

Relief Sought

Delete

~~The current Matarangi golf course land remains a publicly accessible open space area for recreation, views, residential amenity and stormwater management.~~

Replace with

The current Matarangi golf course land remains a publicly accessible open space area for recreation (subject to a charge for public access and use), views, residential amenity and stormwater management.

27.3.4 Policy 2a (b)

Submission in Opposition

This policy is inaccurate in that it relates only to the golf course, but provides for clearly defined open space between development cells and future subdivision. The golf course already provides the open space between development cells, which was an integral part of previous subdivision consents. Future subdivision of the golf course (other than as a controlled activity under 27.3.5 Rule 3.1) is inconsistent with the objectives and policies of the PTCDP and the wording of 27.3.4 Policy 2a (b) should be amended to provide consistency.

Relief Sought

Delete

~~(b) Provide clearly defined space between development cells and future subdivision~~

Replace with

(b) Provide clearly defined open space between existing development cells.

27.3.5 Matarangi Structure Plan Rules

Rule 1.1(a)

Submission in Opposition

This rule does not accurately reflect the situation within the golf course open space zone. The wording should be amended as follows:

Relief Sought

Delete

~~(a) The site remains publicly accessible; and~~

Replace with

(a) The site remains publicly accessible (whether or not there is a charge for public access and use); and

Rule 3.3

Submission in Opposition

Subdivision of land in the Open Space Zone other than for the purposes stated in Rule 3.1 should be a prohibited activity.

Relief Sought

Delete

~~Subdivision in the Open Space Zone that is not a controlled activity under Rule 3.1 is a non-complying activity.~~

Replace with

Subdivision in the Open Space Zone that is not a controlled activity under Rule 3.1 is a prohibited activity.

Rule 4.1 (Techniques for Managing Subdivision in the Residential Zone of the Matarangi Structure Plan)**General Submission in Opposition (Relief is sought under individual rules)**

The method used to determine the status of subdivision in the residential zone of the Matarangi Structure Plan is not fully consistent with achieving the outcomes anticipated from the Purpose, Objectives and Policies of the Structure Plan. There are some standards under Rule 4.1 where the standard requires subjective interpretation, and a range of outcomes may be acceptable. For these standards restricted discretionary status, subject to specified assessment criteria, is appropriate.

There are, however, some standards which should not be subject to restricted discretionary assessment. These rules are specific, measurable and central to the intent of the Structure Plan for new developments at Matarangi. Where these standards (which are proposed to be termed 'Key Structural Elements') are not met, the subdivision should be non-complying.

Rule 4.1.2 appears to incorrectly refer to Table 5. It is assumed that this is meant to be Table 3 in 27.3.6. A submission is made seeking to correct this apparent error.

Rule 4.1.3 provides for subdivision in the Residential zone of the Structure Plan to be considered as a discretionary activity where the subdivision is not a restricted discretionary activity under Rule 4.1. It is not clear from the current structure of the rule what would shift this evaluation from a restricted discretionary to a discretionary activity. It is also considered not appropriate to provide for restricted discretionary assessment of matters that are critical to the future of Matarangi and where the relevant standard can be clearly specified. The recent history of planning at Matarangi has shown that intentions expressed in a District Plan are not always adequate to safeguard the quality of outcomes. The Matarangi community deserves a higher degree of certainty than that currently provided within critical parts of the Structure Plan. Where a subdivision proposal seeks to avoid meeting specified key standards, the District Plan should clearly signal that seeking to avoid meeting these standards is not acceptable. This should be achieved by deeming any such application to be non-complying. Furthermore there should be an expectation that where key standards are not met, the application should be publicly notified, and the local community given an opportunity to express its views. A similar expectation was included in the August 2001 Environment Court Consent Order in relation to Matarangi.

Rule 4.1.1 (Standards to be Met)**Submission in Opposition**

As outlined above it is proposed that the standards to be met under Rule 4.1 be divided into two tranches. In the first tranche the standard is specific and integral to the intention of the Structure Plan and failure to meet the standard determines the

subdivision to be non-complying. These standards are termed 'Key Structuring Elements'. In the second tranche of standards a more flexible approach to achieving the desired outcome is appropriate and assessment of the application by the Council against a specified range of assessment criteria is considered appropriate.

A revision of some of the wording of the standards under 4.1 is also required in order to more accurately provide for the intentions expressed in the objective and policies of the Proposed Plan.

These specific changes to the wording of the standards are provided below to enable clear explanation of the changes sought and the reasons for these changes. They are then incorporated in a composite proposed rewording of Section 27.3.5 that also includes the suggested two tranches of standards proposed above.

Rule 4.1 (b)

Submission in Opposition

This rule does not currently meet the intentions of the objectives and policies of the Structure Plan and reference to the new proposed new Diagrams F and G is required.

Relief Sought

Delete

~~It implements the concepts in Diagrams B, C, D and E.~~

Replace with

It implements the concepts in Diagrams B, C, D, E, F and G.

Rule 4.1 (g)

Submission in Opposition

This rule does not currently meet the intentions of the objectives and policies of the Structure Plan. Applications for subdivision should be required to include a landscaping and planting plan that implements the concepts of existing Diagrams C, D and E together with concepts shown on proposed new Diagrams F and G.

Relief Sought

Delete

~~A landscaping and planting plan that implements the concepts in Diagrams C and D is submitted to the Council with the subdivision application.~~

Replace with

A landscaping and planting plan that implements the concepts in Diagrams C, D, E, F and G is submitted to the Council with the subdivision application.

New Rule in 4.1

Submission in Opposition

Rules are not included in the PTCDP that confirm the required balance between open space and residential development. The current wording of the PTCDP recognises the principle of providing a ratio of 40% open space to 60% residential lots. This principle should be incorporated into the rules of the PTCDP, and classified separately as a Key Structural Element.

Relief Sought

Add in the following new Rule

Subdivisions provide a ratio of 40% open space to 60% residential lots.

Rule 4.2

Submission in Opposition

The first reference to Table 5 appears incorrect and this should be corrected. In addition this Rule requires rewording to take into account the identification of Key Structural Elements proposed elsewhere in this submission, and other consequential changes consistent with the MRAI submission.

Relief Sought

Delete

~~The Council restricts its discretion to all matters in Table 5 and the matters in of Section 38 Subdivision Table 5.~~

Replace with

The Council restricts its discretion in relation to Standards 1(d) – 1(n) to all the matters in Section 27.3.6 Table 3 and the matters in Section 38 Subdivision Table 5.

Rule 4.3

Submission in Opposition

The PTCDP does not currently provide sufficient certainty that adequate publicly accessible and permanently protected open space will be provided, both adjacent to Whangapoua Harbour and within the whole of the undeveloped Structure Plan area. Certain critical standards should be identified as Key Structural Elements, and where a subdivision application does not meet these standards, the application should be **non-complying**. Where each of the three Key Structural Element standards are met the subdivision application should be assessed based on its status under Section 38 Subdivision and against the revised standards 1(d) – 1(n) in Section 27.3.5 and all relevant assessment criteria.

Relief Sought

Delete

Subdivision in the Residential Zone that is not a restricted discretionary activity under Rule 4.1 is a **discretionary activity**

Replace with

Subdivision in the Residential Zone that does not meet the Key Structural Elements standards 1(a) – 1(c) under Rule 4.1 is a **non-complying activity**.

Overview of Proposed Wording Revision for all of Rule 4 in 27.3.5**Submission in Opposition**

In order to incorporate all of the proposals detailed above in relation to Matarangi Structure Plan Rules the following revised wording is proposed for all of Rule 4 in 27.3.5. To clearly identify the changes proposed, all proposed new wording is shown in italics and underlined>.

Relief Sought

Delete

RULE 4 — Subdivision in the Residential Zone

4. ~~Subdivision in the Residential Zone that is a restricted discretionary activity in Section 38 Subdivision retains its activity status provided:~~
- a) ~~It is in accordance with Diagram A; and~~
 - b) ~~It implements the concepts in Diagrams B, C, D and E; and~~
 - e) ~~It meets the standards in Section 38 Table 1 and Table 2; and~~
 - d) ~~The subdivision provides for the comprehensive design and development of a neighbourhood village or of a neighbourhood cell of at least 100 lots; and~~
 - e) ~~Residential lots are no closer than 40 metres from Mean High Water Spring (MHWS) or the Whangapoua Harbour boundary of the esplanade reserve vested in the Council, and any land between the residential lots and the existing Council reserve is vested as Council reserve; and~~
 - f) ~~A minimum of one pedestrian accessway between roads and/or reserves per 15 lots is provided; and~~
 - g) ~~A landscaping and planting plan that implements the concepts in Diagrams C and D is submitted to the Council with the subdivision application; and~~
 - h) ~~Each residential lot, internal access and vehicle access strip is capable of providing stormwater either through soakage to ground or to a piped Stormwater connection into the reticulated stormwater network, in either case capable of handling a 20% Annual Event Probability (AEP) flood; and~~
 - i) ~~Lake outlets have a managed wetland and/or planted swales at the point of discharge to the Whangapoua Harbour to implement the concept in Diagram E; and~~
 - j) ~~Residential lots are designed and contoured to be free from flood waters in a 1% AEP flood, and ponding areas are created with a capacity to hold flood waters in a 1% AEP flood; and~~
 - k) ~~Stormwater ponds adjoin a public road, include wetland plant species where appropriate, and have a formed public pedestrian walkway around the perimeter; and~~

- l)- All open space areas either have a consent notice on their title that preserves public access and the open space character in perpetuity, or are vested in the Council; and
- m) At no cost to the Council, all necessary infrastructure including plants, facilities, utilities, pipes, ancillary equipment and other works are in place, undertaken, expanded or upgraded to cope with peak demands from both existing and proposed subdivision as follows:

Water supply and reticulation:

- i) A treatment plant for treatment of raw water minimum capacity 2 m³ per lot per day and complying with the Drinking water Standard for New Zealand 2005 (Revised 2008); and
- ii) Treated water storage and reticulation capacity sufficient for 1 peak day demand and reticulation of 2.8 m³ per lot per day maximum instantaneous flow to meet domestic and firefighting requirements; and
- iii) Raw water supply or storage minimum capacity 2 m³ per lot per day throughout the duration of the peak period (Christmas Day to Waitangi Day in the following year) and 0.6 m³ per lot per day for the balance of the year; and

Stormwater:

- iv) System capable of handling stormwater flows from upstream catchments outside the Structure Plan area; and
- v) Piped systems to relieve ponding at low points where no secondary flow path outlets are available; and
- vi) Grassed swale flow paths sufficient to convey volume from a 2% AEP flood event; and
- vii) No ponding in roads or grassed swale flow paths in a 20% AEP flood event; and
- viii) Piped and grass swale systems designed to convey stormwater to lakes or dedicated ponding areas especially designed for the purpose; and
- ix) Lakes or dedicated ponding areas designed for a 1% AEP flood event; and
- x) Outlets to Whangapoua Harbour after swale/lake retention; and
- xi) Stormwater diverted from and around the wastewater treatment plant site; and

Wastewater:

- xii) Best engineering practice to minimise stormwater infiltration into the wastewater network
- xiii) A sufficiently sized treatment pond with aeration to cater for the wastewater from all residential lots;
- xiv) Sand filter disposal beds with wick drains upgraded and/or alternative disposal options provided;
- xv) Upgrading and expansion of the system to meet the requirements set out in Table 1.

Monitoring for all services:

- xvi) A compliance and monitoring plan for potable water, wastewater and stormwater reticulation provided to the Council with the subdivision application.

- 2. The Council restricts its discretion to all the matters in Table 5 and the matters in of Section 38 Subdivision Table 5.
- 3. Subdivision in the Residential Zone that is not a restricted discretionary activity under Rule 4.1 is a **discretionary activity**.

Replace with

RULE 4 Subdivision in the Residential Zone

- 1. Subdivision in the Residential Zone that is a restricted discretionary activity in Section 38 Subdivision retains its activity status provided:

Key Structural Elements

- a) Residential lots are no closer than 40 metres from Mean High Water Spring (MHWS) or the Whangapoua Harbour boundary of the esplanade reserve vested in the Council, and any land between the residential lots and the existing Council reserve is vested as Council reserve; and
- b) Subdivisions provide a ratio of 40% open space to 60% residential lots; and
- c) All open space areas provided under Rule 4.1(b) either have a consent notice on their title that preserves public access and the open space character in perpetuity, or are vested in the Council

Other Standards

- d) It is in accordance with Diagram A; and
- e) It implements the concepts in Diagrams B, C, D, E, F and G; and
- f) It meets the standards in Section 38 Table 1 and Table 2; and
- g) The subdivision provides for the comprehensive design and development of a neighbourhood village or of a neighbourhood cell of at least 100 lots; and
- h) A minimum of one pedestrian accessway between roads and/or reserves per 15 lots is provided; and
- i) A landscaping and planting plan that implements the concepts in Diagrams C, D, E, F and G is submitted to the Council with the subdivision application.
- j) Each residential lot, internal access and vehicle access strip is capable of providing stormwater either through soakage to ground or to a piped Stormwater connection into the reticulated stormwater network, in either case capable of handling a 20% Annual Event Probability (AEP) flood; and
- k) Lake outlets have a managed wetland and/or planted swales at the point of discharge to the Whangapoua Harbour to implement the concept in Diagram E; and
- l) Residential lots are designed and contoured to be free from flood waters in a 1% AEP flood, and ponding areas are created with a capacity to hold flood waters in a 1% AEP flood; and
- m) Stormwater ponds adjoin a public road, include wetland plant species where appropriate, and have a formed public pedestrian walkway around the perimeter; and
- n) At no cost to the Council, all necessary infrastructure including plants, facilities, utilities, pipes, ancillary equipment and other works are in place, undertaken, expanded or upgraded to cope with peak demands from both existing and proposed subdivision as follows:

Water supply and reticulation:

- i) A treatment plant for treatment of raw water minimum capacity 2 m3 per lot per day and complying with the Drinking-water Standard for New Zealand 2005 (Revised 2008); and
- ii) Treated water storage and reticulation capacity sufficient for 1 peak day demand and reticulation of 2.8 m3 per lot per day maximum instantaneous flow to meet domestic and firefighting requirements; and

- iii) Raw water supply or storage minimum capacity 2 m3 per lot per day throughout the duration of the peak period (Christmas Day to Waitangi Day in the following year) and 0.6 m3 per lot per day for the balance of the year; and

Stormwater

- iv) System capable of handling stormwater flows from upstream catchments outside the Structure Plan area; and
- v) Piped systems to relieve ponding at low points where no secondary flow path outlets are available; and
- vi) Grassed swale flow paths sufficient to convey volume from a 2% AEP flood event; and
- vii) No ponding in roads or grassed swale flow paths in a 20% AEP flood event; and
- viii) Piped and grass swale systems designed to convey stormwater to lakes or dedicated ponding areas especially designed for the purpose; and
- ix) Lakes or dedicated ponding areas designed for a 1% AEP flood event; and
- x) Outlets to Whangapoua Harbour after swale/lake retention; and
- xi) Stormwater diverted from and around the wastewater treatment plant site; and

Wastewater

- xii) Best engineering practice to minimise stormwater infiltration into the wastewater network
- xiii) A sufficiently-sized treatment pond with aeration to cater for the wastewater from all residential lots;
- xiv) Sand filter disposal beds with wick drains upgraded and/or alternative disposal options provided;
- xv) Upgrading and expansion of the system to meet the requirements set out in Table 1.

Monitoring for all services:

- xvi) A compliance and monitoring plan for potable water, wastewater and stormwater reticulation provided to the Council with the subdivision application.

2. The Council restricts its discretion in relation to Rule 4.1(d) - 4.1(n) to the matters in Section 27.3.6 Table 3 and the matters in Section 38 Subdivision Table 5.
3. Subdivision in the Residential Zone that does not meet the Key Structural Elements standards in Rule 4.1 (a) – 4.1(c) is a **non-complying activity**.

27.3.6 Assessment Matters and Criteria

Table 2 – Controlled Activity Matters **Item 2**

Submission in Opposition

This assessment criterion is inadequate in that it does not reference the permanent protection of public access and open space character as is provided for elsewhere in the PTCDP.

Relief Sought

Delete

~~2. The form and appropriateness of the conservation covenants to protect public access and open space character, if the open space remains in private ownership.~~

Replace with

2. The form and appropriateness of the conservation covenants to permanently protect public access and open space character, if the open space remains in private ownership.

Table 3 – Restricted Discretionary Activity Matters
Item 2c**Submission in Opposition**

This assessment criterion does not take adequate account of the objectives and policies of the PTCDP and should be expanded to provide for assessment against a wider range of matters.

Relief Sought

Delete

~~Whether pedestrian links are provided along the coast and within the subdivision to connect with existing walkways to the beach and Whangapoua Harbour.~~

Replace with

Whether pedestrian links are provided along the coast, and within the subdivision to connect with the ocean beach, the commercial centre, other neighbourhood cells, Whangapoua Harbour and other recreational opportunities.

Diagram A**Submission in Opposition**

Diagram A is insufficient in that it does not recognise the need to provide for key pedestrian linkages throughout the undeveloped area within the Structure Plan. Diagram A should show the direction of Key Pedestrian Connections that connect the ocean beach, the commercial centre, other neighbourhood cells, Whangapoua Harbour and other recreational opportunities. These linkages replicate to some extent, the indicative Open Space zoning currently shown for the area of undeveloped land at Matarangi on Planning Map 20/11 of the Operative District Plan. The key connections that should be shown are:

- (i) From the reserve in the vicinity of the boat ramp, via existing and proposed lakes to Matarangi Drive and then to the commercial centre. In addition there should also be a subsidiary link to the harbour from this route.
- (ii) From the Indicative Reserve near the commercial centre in a north / south direction to the Whangapoua Harbour.
- (iii) From the DOC Reserve at the eastern end of the Structure Plan area to link with the linkage running north / south.

The Indicative Reserve fronting Matarangi Drive near the commercial centre should be reduced in size at its western end. This is more extensive than needed to provide for possible uses such as a youth park and for informal recreation. A park of the size proposed would very likely reduce the ability to provide adequate open space land for the Key Pedestrian Connections that are essential for providing off-road connectivity and for separating future residential development cells.

Relief Sought

Amendments should be made to Diagram A to include the Key Pedestrian Connections outlined above and to show a reduce scale for the Indicative Reserve on the Matarangi Drive road frontage. A revised version of Diagram A (as included at Appendix 1 of this submission) should be included in the Structure Plan.

New Diagrams F and G

Submission in Opposition

The Diagrams included in the Structure Plan are insufficient in that they do not show the required scale and character to be achieved with the Key Pedestrian Connections. Illustrations of the required character of these connections (inclusive of concrete paths with dimensions suitable for shared pedestrian / cycle use) should be included in new Diagrams F and G.

Relief Sought

Add new Diagrams F and G (as included at Appendix 2 and Appendix 3 of this submission) to diagrams included in the Structure Plan.

SECTION 50: OPEN SPACE ZONE

50.1 Zone Description

Submission in Opposition

The current wording of Section 50.1 does not make clear that not all of the Matarangi golf course is within the Structure Plan. Revised wording is required.

Relief Sought

Delete

~~The Open Space zone also covers the existing Matarangi Golf Course as set out in the Matarangi Structure Plan (see Section 27.3).~~

Replace with

The Open Space zone also covers the existing Matarangi Golf Course, the largest portion of which is included in the Matarangi Structure Plan (see Section 27.3).

50.2 Zone Purpose

Submission in Opposition

The wording in relation to the potential for a future covenant or consent notice on the golf course titles should be redrafted to more accurately reflect the situation.

Relief Sought

Delete

~~Eventually a covenant or consent notice on the titles of the Matarangi Golf Course would keep the land as open space in perpetuity.~~

Replace with

Eventually a covenant or consent notice on the titles of the Matarangi Golf Course should confirm the intent for the land to be retained as open space in perpetuity.

50.6 Non-Complying Activities

Submission in Opposition

Informal recreation activities are a non-complying activity on the Matarangi golf course under the PTCDP and this is considered inappropriate. While the operation of the Matarangi golf course is potentially provided for under the definition 'Festival, Event' it would be better to also provide for informal recreation activities to be a permitted activity on the Matarangi golf course and possibly on all land zoned Open Space.

Relief Sought

Either

Amend the definition of "Informal Recreation" in Definitions (Section 3) of the PTCDP to include the wording '*and in the Open Space zone*' as underlined in the revised definition below.

Informal Recreation means outdoor sport, hunting, play and leisure activities that use open space and public amenities on land in the Recreation Area and in the Open Space zone. It may be for profit. It includes plantings, landscaping and ground maintenance. Similar activities that occur outside the Recreation Area are accessory to other activities in the zone.

Or

Provide an alternative solution to ensure that informal recreation is a permitted activity on the Matarangi golf course.

SECTION 38: SUBDIVISION RULES

Submission in Opposition

The PTCDP does not provide consistent subdivision rules for the entire Open Space zone covering the Matarangi golf course. A new provision should be inserted in Section 38 Subdivision in relation to that part of Lot 19 DP 331131 that lies outside the Matarangi Structure Plan area, but is zoned Open Space. This area requires at least the same level of protection from subdivision as the Open Space zoned land within the Structure Plan area.

Relief Sought

Insert a new rule In Section 38 as follows:

For subdivision of that part of Lot 19 DP 331131 that lies outside the Matarangi Structure Plan, Rule 3 of 27.3.5 applies.

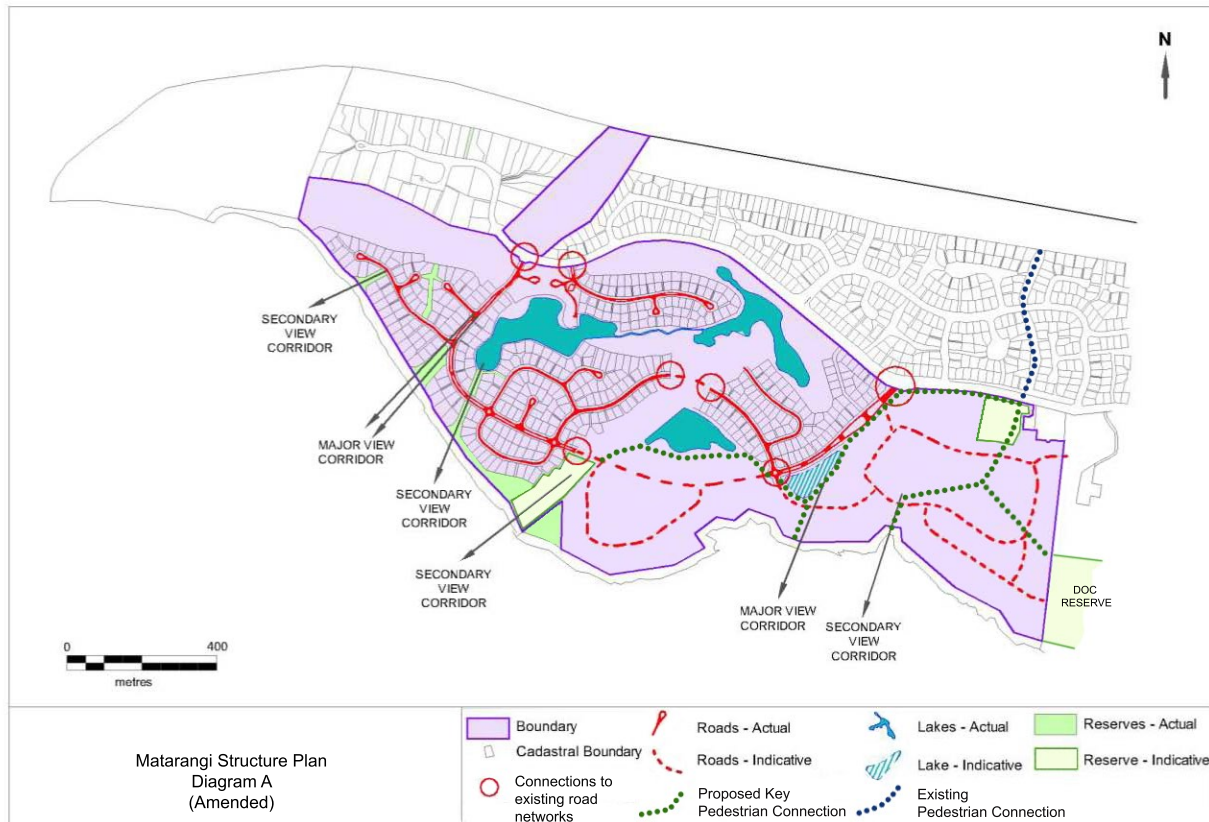
SECTION 3: DEFINITIONS

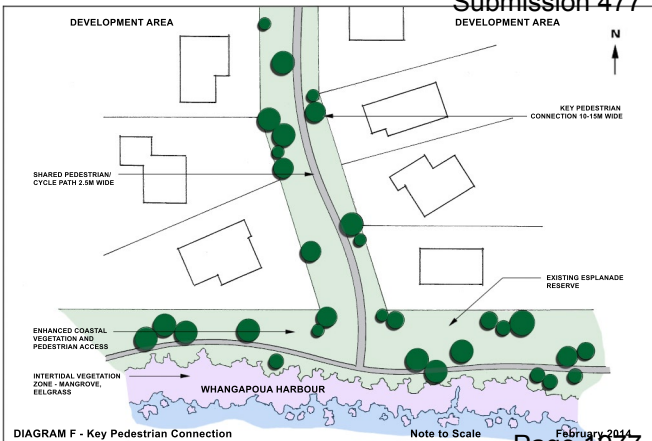
An amendment is proposed to the definition of 'Informal Recreation' (for this submission see above under 50.6 Non-Complying Activities).

4.0 ALTERNATIVE RELIEF, ADDITIONS, DELETIONS AND CONSEQUENTIAL AMENDMENTS

With respect to all matters submitted on, MRAI would be prepared to consider alternative relief that achieves the same purpose as sought by the original submission.

MRAI also seeks to make any additions, deletions or consequential amendments that are made necessary as a result of the matters raised in this submission and/or any such other relief as to give effect to this submission.





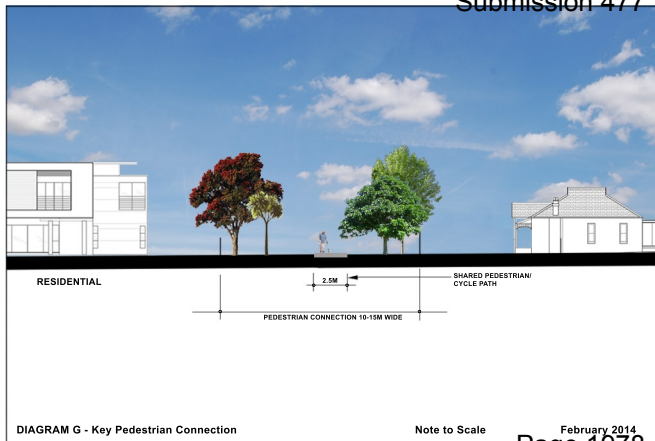


DIAGRAM G - Key Pedestrian Connection

Note to Scale

February 2014

RE: Letter in support of my Submission on the TCDC Proposed District Plan

Dear Mayor Leach and TCDC Councilors,

My name is Tony Watson and I own a holiday house in Pauanui

I oppose the various provisions for Visitor Accommodation throughout the Proposed Thames Coromandel District Plan ("Proposed Plan") as they relate to renting out of private dwellings/holiday homes.

There is no proven evidence that the consumption of local resources and the amenity effects on neighbours are any different with holiday rental holiday homes compared to properties used by their owner/family/friends.

The proposed changes will affect existing holiday home owners, as well as those that aspire to holiday home ownership in the Coromandel. In particular I believe the rules:

- Will decrease the income I receive from my holiday home – income I use to offset expenses such as rates and maintenance.
- Could reduce the value of my property as holiday home ownership becomes less desirable in the Coromandel due to the limitations imposed on holiday rental.
- Will mean less choice for tourists wishing to stay in the Coromandel, resulting in fewer visitors to the region, impacting on Coromandel businesses as result.
- Will not change the amenity effects arising from holiday home usage on the Coromandel.

I urge you to reconsider these rules in your Draft Annual Plan for 2013/2014 and look to implement a system more like that used by Queenstown Lakes District Council that provides allowance for holiday houses to better distinguish them from true commercial accommodation.

I seek the following decision from the Thames Coromandel District Council:

As Principal Relief

(i) Amend the definition of "Visitor Accommodation" in the Proposed Plan, such that the rental of holiday homes is specifically excluded from the definition.

Or, in the alternative, if the principal relief in (i) above is not accepted

(ii) Amend all references to the permitted activity conditions for Visitor Accommodation in the various zones throughout the Proposed Plan relating to "6 tariff-paid customers on-site at any one time" instead amending this to "12 tariff-paid customers on-site at any one time", and delete any condition requiring the activity to be undertaken within an existing dwelling, minor unit

or accessory building.

And, in relation to both (i) and (ii) above

(iii) Any consequential amendments necessary as a result of the amendments to grant the relief sought above.

(Add personal message here)

I look forward to your response.

Tony Watson

8b Jacksons Claim

Pauanui

Proposed Thames-Coromandel District Plan



Submission Form

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

Your submission can be:

Online: www.tcdc.govt.nz/dpr
Using our online submissions form

Posted to: Thames-Coromandel District Council
Proposed Thames-Coromandel District Plan
Private Bag, Thames 3540
Attention: District Plan Manager

Email to: customer.services@tcdc.govt.nz

Delivered to: Thames-Coromandel District Council, 515 Mackay Street, Thames
Attention: District Plan Manager (or to the Area Offices in Coromandel, Whangamata or Whitianga)

Submitter Details

Full Name(s) STUART LINDSAY GORDON
or Organisation (if relevant) _____

Email Address stuart.gordon@tcdc.govt.nz
Postal Address 15 Riverlinks Lane Flagstaff
Hamilton

Phone no. 078294890 Mobile no. 0274765821
include area code

Submissions must be received no later than 5 pm Friday 14 March 2014

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 the Proposed District Plan that my submission relates to are:
(please specify the Objective, Policy, Rule, Map or other reference your submission relates to)

The specific provisions to which our submission relates, as laid out in the letter attached to this submission.

My submission is:

(clearly state whether you SUPPORT or OPPOSE specific parts of the Proposed District Plan or wish to have amendments made, giving reasons for your view)

I support ☐ oppose ☒ the above plan provision.

Reasons for my views:

Please refer to the accompanying letter which forms part of this submission.

The decision I seek from the Council is that the provision above be:

Retained ☐ Deleted ☐ Amended ☒ as follows:

Please refer to the accompanying letter which forms part of this submission.

Proposed District Plan Hearing

I wish to be heard in support of my submission. ☐ Y ☒ N

If others make a similar submission, I will consider presenting a joint case with them at a hearing. ☐ Y ☐ N

Signature of submitter _____ Date 12/3/2014

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. ☐ Y ☒ N

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 ☐ Y ☒ N
- b) does not relate to trade competition or the effects of trade competition. ☒ Y ☐ N

If you require further information about the Proposed District Plan please visit the Council website www.tcdc.govt.nz/dpr

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



10th March 2014

Dear Mayor Leach and TCDC Councilors,

RE: Letter in support of my Submission on the TCDC Proposed District Plan

My name is Stuart Gordon and I own a holiday home in Whangamata.

I **oppose** the various provisions for Visitor Accommodation throughout the Proposed Thames Coromandel District Plan ("Proposed Plan") as they relate to renting out of private dwellings/holiday homes.

There is no proven evidence that the consumption of local resources and the amenity effects on neighbours are any different with holiday rental holiday homes compared to properties used by their owner/family/friends.

The proposed changes will affect existing holiday home owners, as well as those that aspire to holiday home ownership in the Coromandel. In particular I believe the rules:

- Will decrease the income I receive from my holiday home – income I use to offset expenses such as rates and maintenance.
- Could reduce the value of my property as holiday home ownership becomes less desirable in the Coromandel due to the limitations imposed on holiday rental.
- Will mean less choice for tourists wishing to stay in the Coromandel, resulting in fewer visitors to the region, impacting on Coromandel businesses as result.
- Will not change the amenity effects arising from holiday home usage on the Coromandel

I seek the following decision from the Thames Coromandel District Council:

As Principal Relief

(i) Amend the definition of "*Visitor Accommodation*" in the Proposed Plan, such that the rental of holiday homes is specifically excluded from the definition.

Or, in the alternative, if the principal relief in (i) above is not accepted

(ii) Amend all references to the permitted activity conditions for *Visitor Accommodation* in the various zones throughout the Proposed Plan relating to "*6 tariff-paid customers on-site at any one time*" instead amending this to "*12 tariff-paid customers on-site at any one time*", and delete any condition requiring the activity to be undertaken within an existing dwelling, minor unit or accessory building.

And, in relation to both (i) and (ii) above

(iii) Any consequential amendments necessary as a result of the amendments to grant the relief sought above.

I look forward to your response.

Yours faithfully,

_____Stuart Gordon_____

Sent: Wednesday, 12 March 2014 11:47:23 a.m.

To: TCDC General Mail Address

Subject: Submission on Proposed Thames-Coromandel District Plan

Proposed Thames-Coromandel District Plan

Name

Nicola Gibbons

Address

37 Euston Road
Auckland 1025
New Zealand

[Map It](#)

Phone

021 1518877

Email

nickchic2@yahoo.com

My submission is:

Given the outstanding landscapes and ecology of the Coromandel Peninsula and for the benefit of communities and future generations, we need much stronger planning regulations to protect our environment from Mining Activities. The PDP does not articulate the special Qualities, Values and Natural Character of the Coromandel Peninsula, therefore:

I oppose any part of the Proposed District Plan (PDP) which allows Mining Activities, including underground mining, in the District, especially in CONSERVATION, COASTAL, RURAL and RESIDENTIAL ZONES.

- I require the PDP to uphold biodiversity values expressed in the RMA Section 6. I require the Plan to Prohibit all Mining Activities in Outstanding Natural Landscape, Natural Character and Amenity Landscape Overlays in the Section 32 Rules.
- The Objectives and Policies in Section 14 do not reflect community and biodiversity values required by the Waikato Regional Policy Statement (RPS), the Resource Management Act (RMA) and Hauraki Gulf Marine Park Act (HGMPA).
- I require the Plan to specifically protect our coastal environment from mining. The Coastal Zone has been removed without giving adequate protection to coastal biodiversity from adverse impacts of mining. I require the Coastal Environment Overlay to include a rule prohibiting all mining activities.
- The TCDC has failed to translate the 'High Value Conservation Areas' identified in Schedule 4 into 'Outstanding Natural Landscapes' (ONL). I require the Plan to accurately protect Schedule 4 land on the Coromandel Peninsula from all Mining Activities by including all identified Schedule 4 land as part of the Outstanding Landscape Overlay.
- I am concerned that Newmont's Mining Activity in Waihi, including broken promises and mining expansion under people's homes without their consent, is a threat to our small coastal communities. I want the Plan to Prohibit Mining Activities under people's homes.
- I need to be confident that the TCDC has recognised the views of tangata whenua on mining in the PDP.

I oppose Section 37 - Mining Activities.

- Section 37.4 Note 1 fails to provide any rules for Underground Mining Activities in affected Zones outside the access zone.
- I want the TCDC to amend Section 37.4 Table 1 of the PDP to state that all Mining Activities are Prohibited in all Zones, including prospecting and exploration, or other such relief that has the same effect.
- I support Quarrying activities to be separated from Mining Activities to avoid confusion.

I oppose Section 14 - Mining Activities.

• I want the language of in Section 14.1 (Mining Activities) to clearly state how future mining activities will have a major adverse impact on the unique Conservation Values and Natural Character of the Coromandel. We must acknowledge the adverse impacts of the modern Mining Industry on small communities.

• I want the TCDC to remove the sentence: "The District has a long history of mining for gold and other minerals." (p73), and instead acknowledge that the Gold Mining boom lasted only 70 years, between 1860 and 1930, and was a small scale industry compared to the Mining Activities of today.

• I want the Plan to acknowledge the long term economic, social and environmental legacy of historical mining in the District and it's detrimental effects.

• Of particular concern to me is the statement "The Plan includes provisions to enable the Council to take the presence of mineral resources into account when assessing proposals for the subdivision, use and development of land." (p73) Along with Section 14.2.2 this gives mining priority over other forms of development. I oppose Mining Activities having such a priority. I completely disagree with the intention of Section 14.2.2 and require this to be removed as it is unrepresentative of community values.

- The Coromandel Peninsula Blueprint, where community values were assessed, has not been fully translated into the Plan and sustainable and development and biodiversity growth are not prioritised. I support the council to change the wording in the PDP to uphold these values expressed by Coromandel communities.

- There is no acknowledgment of the fact that a large number of Coromandel residents are opposed to mining, TCDC must acknowledge this, and that the 40 year history of the 'No Mining' campaign in Coromandel has contributed significantly to our Natural Character.

In summary: I require the plan to be amended so that all mining activities are prohibited in all zones and overlays, or other such relief that has the same effect, and the language amended in Section 14 to accurately represent the history of mining and the opposition to it.

The special nature of the Coromandel warrants robust protection especially as there is so much economic revenue and employment dependent on our reputation as a clean green holiday destination. It is vital we do not allow mining into the Peninsula, as this is contrary to the existing Natural Character of the Thames-Coromandel District.

I would like to speak to my submission.

- No

I would consider presenting a joint case with others who have made a similar submission.

- No

I would like to thank the Council for this opportunity to submit on the PDP.

Yours sincerely,

Nicola Jane Gibbons

Date

12/03/2014

Submission on Proposed District Plan (13 December 2013)

Stewart Robinson
glentutti@xtra.co.nz

99 Kowhai Drive
 RD 1
 Coromandel 3581
 ph. 07 8667596

Stormwater management in headwaters of catchments

As noted in the Plan heavy rainfall events and flooding is a significant natural hazard in the Coromandel (Section 10) and considerable effort is expended in attempting to mitigate the effects by stormwater management on the peninsula. However, S.10 does not note or discuss hazard identification and management of the headwaters of water catchments. Management of water runoff from such sites would be important for mitigating the risk of downstream flooding and reducing this risk to tolerable or acceptable levels (Tables in Section 10.1, pages 61 & 62). Such risk reduction rules will have consequences for the requirement for resource consent for land use and specific activities. The policies and rules are concentrated more on mitigation downstream on flood plains and coastal areas. For example, which of the objectives and policies in S 10 would apply to rural pasture land use in upper catchment areas?

Nor is stormwater adequately dealt with in Section 24 Rural Areas, including the Rural Zone, the Rural Lifestyle Zone and the Coastal Environment (where this falls within the Area). Specifically:

1. Section 24.2 Issues - there is no mention of land and stormwater management to prevent/mitigate water runoff leading to flooding and erosion/slips. It would be useful to list another "Issue" with corresponding objective that covered land and stormwater management of the headwaters of catchments, and consequent policies, to cover this deficit. There is recent research evidence from Wales which quantifies the benefit of appropriate tree planting on upland pasture land in diminishing rainwater runoff and thereby mitigating the contribution of this source of stormwater on flooding in the river catchment: see M.R. Marshall et al, 2013. The impact of rural land management changes on soil hydraulic processes: results from experimental plots in upland UK. Hydrological Processes, DOI:10.1002/hyp9826. [\[http://onlinelibrary.wiley.com/doi/10.1002/hyp.9826/abstract\]](http://onlinelibrary.wiley.com/doi/10.1002/hyp.9826/abstract). And for results using computer models based on this research see, Howard Wheeler et al, 2008. Impacts of upland management changes on flood risk: multi-scale modelling methodology and results from the Pontbren experiment. FRMRC Report UR 16. Available online at: [\[http://nora.nerc.ac.uk/5890/1/ur16_impacts_upland_land_management_wp2_2_v1_0.pdf\]](http://nora.nerc.ac.uk/5890/1/ur16_impacts_upland_land_management_wp2_2_v1_0.pdf). (Both of these references are taken from a recent article by George Monbiot: www.monbiot.com/2014/01/13/drowning-in-money/ which discusses the implications of the research and may be of interest in itself even though it is dealing with flooding in the UK.)
2. Section 24.3, Policy 4b does require "that activities in the Rural Area shall be self-contained with regard to water, stormwater and wastewater servicing" but there is no indication of how this is to be monitored or policed let alone mandating land management practices which would delay stormwater runoff into streams and rivers.
3. Section 24.3, Policy 5a deals with minimizing the discharge of sediments and contaminants to

water in the Coastal Environment. But there is no mention of how this is to be achieved in a forestry block after felling and harvesting of timber without active measures being mandated to reduce water runoff from the higher catchments. Pollution of river courses, harbours & estuaries with forestry detritus is unfortunately all too common after such activities.

4. It should be noted that Section 6 Biodiversity also mentions stormwater management but without highlighting the fact that upper parts of water catchments are critically important in mitigating flood and erosion risks to tolerable if not acceptable levels (Tables in Section 10.1, pages 61 & 62), i.e., with minor or insignificant impact severity. Specifically in Section 6.2 Issue 2 acknowledges that poor land management practices do contribute to the degradation and loss of important indigenous habitats including from stormwater runoff. And Objective 1, Policy 1b subsection d), of Section 6.3 relates to clearance of indigenous vegetation increasing natural hazard risk, e.g. erosion and flooding. The potential for new tree planting/restoration of indigenous vegetation to mitigate water runoff and flood risk could be emphasized (6.2 Issue 3).
5. There do not appear to be any rules in Section 29 Biodiversity aimed at reducing water runoff from upper water catchments by regulating where it is permissible to clear indigenous vegetation from. The rules appear to be directed purely toward maintaining or enhancing indigenous vegetation. It would seem that, given the nature of natural hazards that the peninsula is exposed to, there needs to be a further aim of preventing/mitigating the risks of flooding and erosion as well by reducing vegetation clearance (indigenous or exotic) in critical areas of water catchments.

Biodiversity

Section 6.4 Non-regulatory Methods.

1. Subsection 2: Will Council continue to use the current (2008) Biodiversity Strategy until it has been reviewed? Section 7.0 'Strategic Approach' of the Biodiversity Strategy document is still highly relevant and the implementation of the five goals listed in Section 7.3 are as important and relevant today as they were in 2008. In particular there needs to be coverage in this section of the Proposed DP of a commitment to "Goal 5: Providing ongoing monitoring of Council's contribution to Biodiversity Management". Without appropriate, timely and adequate monitoring how can we be assured that any of the policies set forth in Section 6.3 of the PDP have achieved their aims and objectives and those of the RMA Section 6c (cited in Section 29.1 of the PDP).
2. When is the Biodiversity Strategy document to be reviewed? Some sort of time-line or commitment to a date should be included in the PDP.

I seek amendments as detailed above.

I do not wish to be heard in support of my submission.

Stewart Robinson
99 Kowhai Drive
RD 1
Coromandel 3581
12 March, 2014

Sent: Wednesday, 12 March 2014 1:12:58 p.m.

To: TCDC General Mail Address

Subject: Submission on Proposed Thames-Coromandel District Plan

Proposed Thames-Coromandel District Plan

Name

liliana morande

Address

38j korma road royal oak
auckland 2023
New Zealand
[Map It](#)

Phone

64212524005

Email

lilianarosa@hotmail.com

My submission is:

Given the outstanding landscapes and ecology of the Coromandel Peninsula and for the benefit of communities and future generations, we need much stronger planning regulations to protect our environment from Mining Activities. The PDP does not articulate the special Qualities, Values and Natural Character of the Coromandel Peninsula, therefore:

I oppose any part of the Proposed District Plan (PDP) which allows Mining Activities, including underground mining, in the District, especially in CONSERVATION, COASTAL, RURAL and RESIDENTIAL ZONES.

- I require the PDP to uphold biodiversity values expressed in the RMA Section 6. I require the Plan to Prohibit all Mining Activities in Outstanding Natural Landscape, Natural Character and Amenity Landscape Overlays in the Section 32 Rules.
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- I require the Plan to specifically protect our coastal environment from mining. The Coastal Zone has been removed without giving adequate protection to coastal biodiversity from adverse impacts of mining. I require the Coastal Environment Overlay to include a rule prohibiting all mining activities.
- The TCDC has failed to translate the 'High Value Conservation Areas' identified in Schedule 4 into 'Outstanding Natural Landscapes' (ONL). I require the Plan to accurately protect Schedule 4 land on the Coromandel Peninsula from all Mining Activities by including all identified Schedule 4 land as part of the Outstanding Landscape Overlay.
- I am concerned that Newmont's Mining Activity in Waihi, including broken promises and mining expansion under people's homes without their consent, is a threat to our small coastal communities. I want the Plan to Prohibit Mining Activities under people's homes.
- I need to be confident that the TCDC has recognised the views of tangata whenua on mining in the PDP.

I oppose Section 37 - Mining Activities.

- Section 37.4 Note 1 fails to provide any rules for Underground Mining Activities in affected Zones outside the access zone.
- I want the TCDC to amend Section 37.4 Table 1 of the PDP to state that all Mining Activities are Prohibited in all Zones, including prospecting and exploration, or other such relief that has the same effect.
- I support Quarrying activities to be separated from Mining Activities to avoid confusion.

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• I want the language of in Section 14.1 (Mining Activities) to clearly state how future mining activities will have a major adverse impact on the unique Conservation Values and Natural Character of the Coromandel. We must acknowledge the adverse impacts of the modern Mining Industry on small communities.

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• I want the Plan to acknowledge the long term economic, social and environmental legacy of historical mining in the District and it's detrimental effects.

• Of particular concern to me is the statement "The Plan includes provisions to enable the Council to take the presence of mineral resources into account when assessing proposals for the subdivision, use and development of land." (p73) Along with Section 14.2.2 this gives mining priority over other forms of development. I oppose Mining Activities having such a priority. I completely disagree with the intention of Section 14.2.2 and require this to be removed as it is unrepresentative of community values.

• The Coromandel Peninsula Blueprint, where community values were assessed, has not been fully translated into the Plan and sustainable and development and biodiversity growth are not prioritised. I support the council to change the wording in the PDP to uphold these values expressed by Coromandel communities.

• There is no acknowledgment of the fact that a large number of Coromandel residents are opposed to mining, TCDC must acknowledge this, and that the 40 year history of the 'No Mining' campaign in Coromandel has contributed significantly to our Natural Character.

In summary: I require the plan to be amended so that all mining activities are prohibited in all zones and overlays, or other such relief that has the same effect, and the language amended in Section 14 to accurately represent the history of mining and the opposition to it.

The special nature of the Coromandel warrants robust protection especially as there is so much economic revenue and employment dependent on our reputation as a clean green holiday destination. It is vital we do not allow mining into the Peninsula, as this is contrary to the existing Natural Character of the Thames-Coromandel District.

I would like to speak to my submission.

- No

I would consider presenting a joint case with others who have made a similar submission.

- Yes

I would like to thank the Council for this opportunity to submit on the PDP.

Yours sincerely,

Liliana Rosa Morande-Alvarez

Date

12/03/2014

Sent: Wednesday, 12 March 2014 22:41:41

To: TCDC General Mail Address

Subject: Submission on Proposed Thames-Coromandel District Plan

Proposed Thames-Coromandel District Plan

Name

Trevor Ross

Address

12 Ballykeeffe
Dooradoyle 0000
Ireland
[Map It](#)

Email

loavjo@gmail.com

My submission is:

Given the outstanding landscapes and ecology of the Coromandel Peninsula and for the benefit of communities and future generations, we need much stronger planning regulations to protect our environment from Mining Activities. The PDP does not articulate the special Qualities, Values and Natural Character of the Coromandel Peninsula, therefore:

I oppose any part of the Proposed District Plan (PDP) which allows Mining Activities, including underground mining, in the District, especially in CONSERVATION, COASTAL, RURAL and RESIDENTIAL ZONES.

- I require the PDP to uphold biodiversity values expressed in the RMA Section 6. I require the Plan to Prohibit all Mining Activities in Outstanding Natural Landscape, Natural Character and Amenity Landscape Overlays in the Section 32 Rules.

- The Objectives and Policies in Section 14 do not reflect community and biodiversity values required by the Waikato Regional Policy Statement (RPS), the Resource Management Act (RMA) and Hauraki Gulf Marine Park Act (HGMPA).

- I require the Plan to specifically protect our coastal environment from mining. The Coastal Zone has been removed without giving adequate protection to coastal biodiversity from adverse impacts of mining. I require the Coastal Environment Overlay to include a rule prohibiting all mining activities.

- The TCDC has failed to translate the 'High Value Conservation Areas' identified in Schedule 4 into 'Outstanding Natural Landscapes' (ONL). I require the Plan to accurately protect Schedule 4 land on the Coromandel Peninsula from all Mining Activities by including all identified Schedule 4 land as part of the Outstanding Landscape Overlay.

- I am concerned that Newmont's Mining Activity in Waihi, including broken promises and mining expansion under people's homes without their consent, is a threat to our small coastal communities. I want the Plan to Prohibit Mining Activities under people's homes.

- I need to be confident that the TCDC has recognised the views of tangata whenua on mining in the PDP.

I oppose Section 37 - Mining Activities.

- Section 37.4 Note 1 fails to provide any rules for Underground Mining Activities in affected Zones outside the access zone.

- I want the TCDC to amend Section 37.4 Table 1 of the PDP to state that all Mining Activities are Prohibited in all Zones, including prospecting and exploration, or other such relief that has the same effect.

- I support Quarrying activities to be separated from Mining Activities to avoid confusion.

I oppose Section 14 - Mining Activities.

- I want the language of in Section 14.1 (Mining Activities) to clearly state how future mining activities will have a major adverse impact on the unique Conservation Values and Natural Character of the Coromandel. We must acknowledge the adverse impacts of the modern Mining Industry on small communities.

- I want the TCDC to remove the sentence: "The District has a long history of mining for gold and other minerals." (p73), and instead acknowledge that the Gold Mining boom lasted only 70 years, between 1860 and 1930, and was a small scale industry compared to the Mining Activities of today.

- I want the Plan to acknowledge the long term economic, social and environmental legacy of historical mining in the District and it's detrimental effects.

- Of particular concern to me is the statement "The Plan includes provisions to enable the Council to take the presence of mineral resources into account when assessing proposals for the subdivision, use and development of land." (p73) Along with Section 14.2.2 this gives mining priority over other forms of development. I oppose Mining Activities having such a priority. I completely disagree with the intention of Section 14.2.2 and require this to be removed as it is unrepresentative of community values.

- The Coromandel Peninsula Blueprint, where community values were assessed, has not been fully translated into the Plan and sustainable and development and biodiversity growth are not prioritised. I support the council to change the wording in the PDP to uphold these values expressed by Coromandel communities.

- There is no acknowledgment of the fact that a large number of Coromandel residents are opposed to mining, TCDC must acknowledge this, and that the 40 year history of the 'No Mining' campaign in Coromandel has contributed significantly to our Natural Character.

In summary: I require the plan to be amended so that all mining activities are prohibited in all zones and overlays, or other such relief that has the same effect, and the language amended in Section 14 to accurately represent the history of mining and the opposition to it.

The special nature of the Coromandel warrants robust protection especially as there is so much economic revenue and employment dependent on our reputation as a clean green holiday destination. It is vital we do not allow mining into the Peninsula, as this is contrary to the existing Natural Character of the Thames-Coromandel District.

My further comments:

I am a NZ citizen and the fact that I am currently residing outside of NZ does not make my concern over what is being done to my country any less.

I would like to speak to my submission.

- No

I would consider presenting a joint case with others who have made a similar submission.

- No

I would like to thank the Council for this opportunity to submit on the PDP.

Yours sincerely,

Trevor Ross

Date

12/03/2014

Sent: Wednesday, 12 March 2014 1:59:36 p.m.

To: TCDC General Mail Address

Subject: Submission on Proposed Thames-Coromandel District Plan

Proposed Thames-Coromandel District Plan

Name

Abigail Smith

Address

1/51 Fife St
Auckland 1022
New Zealand

[Map It](#)

Email

divinefire79@live.com

My submission is:

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- I need to be confident that the TCDC has recognised the views of tangata whenua on mining in the PDP.

I oppose Section 37 - Mining Activities.

- Section 37.4 Note 1 fails to provide any rules for Underground Mining Activities in affected Zones outside the access zone.

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I would like to speak to my submission.

- No

I would consider presenting a joint case with others who have made a similar submission.

- Yes

I would like to thank the Council for this opportunity to submit on the PDP.

Yours sincerely,

Abigail Smith

Date

12/03/2014

Proposed Thames-Coromandel District Plan

THAMES
COROMANDEL
DISTRICT COUNCIL

Submission Form

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

Your submission can be:

Online: www.tcdc.govt.nz/dpr
Using our online submissions form

Posted to: Thames-Coromandel District Council
Proposed Thames-Coromandel District Plan
Private Bag, Thames 3540
Attention: District Plan Manager

Email to: customer.services@tcdc.govt.nz

Delivered to: Thames-Coromandel District Council, 515 Mackay Street, Thames
Attention: District Plan Manager (or to the Area Offices in Coromandel, Whangamata or Whitianga)

Submitter Details

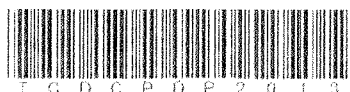
Full Name(s)	Radhael Louise Singh		
or Organisation (if relevant)			
Email Address	radhkirps@farmside.co.nz		
Postal Address	76 Manawatu Road RD1 Te Anau 3391		
Phone no. include area code	07 8846684	Mobile no.	021 842 841

Submissions must be received no later than 5 pm Friday 14 March 2014

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 the Proposed District Plan that my submission relates to are:
(please specify the Objective, Policy, Rule, Map or other reference your submission relates to)

The specific provisions to which our submission relates, as laid out in the letter attached to this submission.

My submission is:

(clearly state whether you SUPPORT or OPPOSE specific parts of the Proposed District Plan or wish to have amendments made, giving reasons for your view)

I **support** ☐ **oppose** ☒ **the above plan provision.**

Reasons for my views:

Please refer to the accompanying letter which forms part of this submission.

The decision I seek from the Council is that the provision above be:

Retained ☐ **Deleted** ☐ **Amended** ☒ **as follows:**

Please refer to the accompanying letter which forms part of this submission.

Proposed District Plan Hearing

I wish to be heard in support of my submission. ☐ Y ☒ N

If others make a similar submission, I will consider presenting a joint case with them at a hearing. ☐ Y ☒ N

Signature of submitter  **Date** 12/4/13.

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. ☐ Y ☒ N

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.

☒ Y ☐ N

If you require further information about the Proposed District Plan please visit the Council website www.tcdc.govt.nz/dpr

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



RE: Letter in support of my Submission on the TCDC Proposed District Plan

Dear Mayor Leach and TCDC Councilors,

My name is Rachael Singh and I own a holiday house in Whangamata.

I oppose the various provisions for Visitor Accommodation throughout the Proposed Thames Coromandel District Plan ("Proposed Plan") as they relate to renting out of private dwellings/holiday homes.

There is no proven evidence that the consumption of local resources and the amenity effects on neighbours are any different with holiday rental holiday homes compared to properties used by their owner/family/friends.

The proposed changes will affect existing holiday home owners, as well as those that aspire to holiday home ownership in the Coromandel. In particular I believe the rules:

- Will decrease the income I receive from my holiday home – income I use to offset expenses such as rates and maintenance.
- Could reduce the value of my property as holiday home ownership becomes less desirable in the Coromandel due to the limitations imposed on holiday rental.
- Will mean less choice for tourists wishing to stay in the Coromandel, resulting in fewer visitors to the region, impacting on Coromandel businesses as result.
- Will not change the amenity effects arising from holiday home usage on the Coromandel.

I urge you to reconsider these rules in your Draft Annual Plan for 2013/2014 and look to implement a system more like that used by Queenstown Lakes District Council that provides allowance for holiday houses to better distinguish them from true commercial accommodation.

I seek the following decision from the Thames Coromandel District Council:

As Principal Relief

(i) Amend the definition of "Visitor Accommodation" in the Proposed Plan, such that the rental of holiday homes is specifically excluded from the definition.

Or, in the alternative, if the principal relief in (i) above is not accepted

(ii) Amend all references to the permitted activity conditions for Visitor Accommodation in the various zones throughout the Proposed Plan relating to "6 tariff-paid customers on-site at any one time" instead amending this to "12 tariff-paid customers on-site at any one time", and delete any condition requiring the activity to be undertaken within an existing dwelling, minor unit or accessory building.

And, in relation to both (i) and (ii) above

(iii) Any consequential amendments necessary as a result of the amendments to grant the relief sought above.

I look forward to your response.

Regards

Rachael Singh

Sent: Wednesday, 12 March 2014 2:34:43 p.m.

To: TCDC General Mail Address

Subject: Submission on Proposed Thames-Coromandel District Plan

Proposed Thames-Coromandel District Plan

Name

Caroline Snook

Address

51 Wood Bay Road
Auckland 0604
New Zealand

[Map It](#)

Email

carochildcare@gmail.com

My submission is:

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My further comments:

I n t e g r i t y

S e l l i n g y O u r S o u l N o m o r e

I n t e g r i t y P l e a s e

T h a n k Y o u f o r Y o u r H e l p

I would like to speak to my submission.

- No

I would consider presenting a joint case with others who have made a similar submission.

- No

I would like to thank the Council for this opportunity to submit on the PDP.

Yours sincerely,

Caroline Snook

Date

12/03/2014

Proposed Thames-Coromandel District Plan



Submission Form

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

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Delivered to: Thames-Coromandel District Council, 515 Mackay Street, Thames
Attention: District Plan Manager (or to the Area Offices in Coromandel, Whangamata or Whitianga)

Submitter Details

Full Name(s) Christina Needham
or Organisation (if relevant) _____

Email Address christinaneedham14@gmail.com

Postal Address 120 Main Road South, Raumati Beach. Kapiti 5032. WELLINGTON

Phone no. ()
include area code 04 9050064

Mobile no. 021 424425

Submissions must be received no later than 5 pm Friday 14 March 2014

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

PRIVACY ACT 1993

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Your Submission

The specific provisions of the Proposed District Plan that my submission relates to are:
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Part II Section 9 Landscape and Natural Character

My submission is:

(clearly state whether you SUPPORT or OPPOSE specific parts of the Proposed District Plan or wish to have amendments made, giving reasons for your view)

I **support** ☒ **oppose** ☐ **the above plan provision.**

Reasons for my views:

attached 4 page submission

The decision I seek from the Council is that the provision above be:

Retained ☐ **Deleted** ☐ **Amended** ☐ **as follows:**

include Slipper Island in proposed District Plan Natural Character Overlay

Proposed District Plan Hearing

I wish to be heard in support of my submission. ☒ **Y** ☐ **N**

If others make a similar submission, I will consider presenting a joint case with them at a hearing. ☒ **Y** ☐ **N**

Signature of submitter C L Needham **Date** 14 March 2014

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. ☐ **Y** ☐ **N**

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 ☐ **Y** ☐ **N**
- b) does not relate to trade competition or the effects of trade competition. ☐ **Y** ☐ **N**

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Section 9 Landscape and Natural Character

Preservation of the natural character of the Coastal Environment, Slipper Island.

Introduction

The landscape and natural character of the Coromandel Peninsula are some of its most important values that require protection and preservation. Islands in particular provide unique opportunities to become breeding sanctuaries for many native flora and fauna. Slipper Island has its own unique marine eco-system and biodiversity. The use and development by humans (from early Polynesian settlement, historical Māori occupation, and more recent Europeans) on Slipper Island have modified, degraded and altered the appearance of naturally functioning ecosystems, especially rare and vulnerable ecosystems such as its coastal wetlands and sand dunes.

Overlay and Planning Maps

I note (section 9.1.2) states:

Outstanding Landscapes

Section 6(b) of the RMA identifies “the protection of outstanding natural features and landscapes from inappropriate subdivision, use, and development” as a matter of national importance. The RPS also has policy and methods to identify and protect this. Landscape values are a reflection of both the biophysical environment and people’s perception of that environment. Slipper Island has been rated “Outstanding Landscape” Landscape Unit:76 East Coast Islands.

I note (section 9.1.4) states:

Natural Character

Section 6(a) of the RMA identifies “the preservation of the natural character of the Coastal Environment (including the coastal marine area), wetlands, and lakes and rivers and their margins, and the protection of them from inappropriate subdivision, use, and development” as a matter of national importance. Slipper Island should also be assessed and rated with “Natural Character”. This provides an additional layer of protection of its Coastal Environment.

I note (section 9.1.4) states:

The Natural Character Overlay in the Plan encompasses areas with outstanding and high natural character....Additional policy is included to address opportunities for restoration and enhancement of these areas. An opportunity to address the restoration and enhancement, and protection of the island’s Biodiversity is critically required.

I note (section 9.1.4) states:

The ecological assessment of high natural character was described in the report: Graeme, J., Dahm, J., Kendal, H. January 2010. *Coromandel Peninsula Ecological Assessment of Natural Character*. Natural Solutions Contract Report 09/087. Focus Resource Management Group. High natural character was assessed in terms of both ecology (the viable functioning of natural processes) and experience (the attributes of ‘naturalness’). It included identification of sand dunes, gravel and boulder beaches, coastal wetlands, coastal forest, inland wetlands and rivers that have strong natural functioning. This report most likely did not include Slipper Island due to lack of available data and remoteness from the mainland.

I note (section 5.1) of **Coromandel Peninsula Ecological Assessment of Natural Character (2010)** states:

*The Ministry for the Environment and Department of Conservation have identified four ‘National Priorities for Protecting Rare and Threatened Native Biodiversity on Private Land’ (DoC & MfE, 2007). These priorities will help identify those critical areas of existing high natural character which require the most urgent attention:
4 Critical = those ecosystems that fall within the national priorities for protection (DoC & MfE, 2007) or are identified as local priorities by council.*

TCDC Natural Character – Ecological Assessment 40

National Priority 1:

Indigenous vegetation associated with land environments, (defined by Land Environments of New Zealand at Level IV), that have 20 percent or less remaining in indigenous cover.

Page 2 of 4

National Priority 2:

Indigenous vegetation associated with sand dunes and wetlands; ecosystem types that have become uncommon due to human activity.

National Priority 3:

Indigenous vegetation associated with 'originally rare' terrestrial ecosystem types not already covered by priorities 1 and 2. Ecosystems relevant to the Thames-Coromandel district include coastal systems, such as coastal turf and coastal rock stacks.

National Priority 4:

Habitats of acutely and chronically threatened indigenous species.

While this is not an ecosystem-focused priority, threatened species are often linked with threatened ecosystems (≈habitat). Habitat protection is essential for the ongoing protection of threatened species.

An assessment to identify critical areas of existing high natural character on the island is urgently required. This is for long term preservation, protection and restoration of the islands natural and unique eco-system. I believe that an opportunity to go further into this point is required.

I agree with and support (section 9.3) **Objective 1: Outstanding Landscapes remain outstanding and their values and characteristics are protected from inappropriate subdivision, use and development and resulting adverse cumulative effects.** Slipper Island is rated *Outstanding* on Landscape Unit 76: East Coast Islands.

I agree with and support (section 9.3) **Objective 2: The qualities and characteristics of Amenity Landscapes are maintained or enhanced and continue to contribute to the pleasantness, aesthetic coherence and cultural and recreational values of the landscape.** Preservation and protection of the island is critically required to uphold its amenity.

I agree with and support (section 9.3) **Objective 3: The natural character of the Coastal Environment, wetlands, and lakes and rivers and their margins is protected and enhanced.** Slipper Island has been farmed for over 100 years. Over this time wetlands have been drained, natural coastal forest areas removed, earthworks carried out, and wildlife disturbed and dwindled in numbers. A restoration policy and plan is needed for the island.

I agree with and support (section 9.3) **Policy 3a:**

Subdivision, use and development shall be avoided where it will damage, diminish or compromise the natural appearance, functioning, biodiversity or ecological resilience areas within the *Natural Character Overlay*, especially (but not limited to) adverse effects from the following activities in the following areas: Slipper Island, Planning Map:30

a)Gravel and boulder beaches: landform modification, seawalls, indigenous vegetation clearance, coastal reclamation, roads, gravel extraction, man-made structures.

b)Coastal cliff/escarpments: earthworks, indigenous vegetation clearance, roads, man-made structures.

c)Sand dunes: landform modification, seawalls, indigenous vegetation clearance, seawalls; buildings; plant and animal pests, man-made structures.

d)Inland and coastal wetlands: indigenous vegetation clearance, drainage, stop banks, earth infill, reclamation, stock access, animal and plant pests, increased sediment runoff from subdivision and development;

e)Coastal forests: indigenous vegetation clearance, stock browsing, animal and plant pests;

f)Rivers: indigenous vegetation clearance, man-made structures.

I agree with and support (section 9.3) **Policy 3b:**

Significant adverse effects on natural character in the *Coastal Environment* within the *Natural Character Overlay* shall be avoided and other adverse effects shall be avoided, remedied or mitigated. Slipper Island is remote and away from public environmental watchdogs. Protection policies are more favourable than retrospective mitigation action.

Page 3 of 4

I agree with and support (section 9.3) **Policy 3c:**

Buildings and other structures shall be located and designed to integrate with the surrounding Natural Character overlay, with adverse effects on Natural Character. Boffa Miskell report: *Landscape and Visual Effects Assessment (2001)*.

I agree with and support (section 9.3) **Policy 3d:**

The enhancement of the *Natural Character Overlay* in the Coastal Environment, wetlands, and lakes and rivers and their margins shall be promoted. This may include (but is not limited to): Slipper Island is required to be included in the Natural Character Overlay to promote protection of its wetlands. Current practice of farm dumps close to swamp areas need to be addressed. Wetland areas need to be fenced off and restored. Recognition of all wetland areas on the island critically need to be identified to aid in providing legal protection and covenants.

- a) Permanent stock exclusion; and
- b) Removal of plant and animal pests; and
- c) Encouraging natural regeneration of indigenous species; and
- d) Planting species appropriate for the ecosystem using local genetic stock where available; and
- e) Creating or enhancing indigenous habitat and/or habitat for threatened or at risk indigenous species, including raising the water level for wetlands; and
- f) Legal protection for indigenous ecosystems; and
- g) Reducing or eliminating discharge of contaminants; and
- h) Removing redundant, unnecessary or inappropriate man-made structures, provided they have minimal historic heritage or amenity value; and
- i) Restoring long-term natural functioning of physical processes and features over a 100 year timeframe, particularly dunes, wetlands and intertidal saltmarsh; and
- j) Protecting geological features; and
- k) Rehabilitating historic landfills and other contaminated sites which are, or have the potential to, leach material into the coastal marine area; and
- l) Redesigning structures that interfere with natural character processes, such as perched culverts that prevent migratory fish access.

I agree with and support (section 9.3) **Objective 4: The natural character of the Coastal Environment, wetlands, and lakes and rivers and their margins is maintained, enhanced or restored.** Slipper Island wetlands.

I agree with and support (section 9.3) **Policy 4a:**

Subdivision, use and development in the Coastal Environment, outside of the Natural Character Overlay, shall avoid significant adverse effects and avoid, remedy or mitigate adverse effects on other natural character values. Monitoring of existing subdivision to enforce preservation of Natural Character of the island.

I agree with and support (section 9.3) **Policy 4b:**

The restoration or enhancement of natural character in the Coastal Environment, wetlands, and lakes and rivers and their margins outside of the natural character overlay shall be promoted. This may include (but is not limited to): Future preservation and protection plan of Slipper Island.

- a) Permanent stock exclusion; and
- b) Removal of plant and animal pests; and
- c) Encouraging natural regeneration of indigenous species; and
- d) Planting species appropriate for the ecosystem using local genetic stock where available; and

Page 4 of 4

- e) Creating or enhancing indigenous habitat and/or habitat for threatened or at risk indigenous species, including raising the water level for wetlands; and
- f) Legal protection for indigenous ecosystems; and
- g) Reducing or eliminating discharge of contaminants; and
- h) Removing redundant, unnecessary or inappropriate man-made structures, provided they have minimal historic heritage or amenity value; and
- i) Restoring long-term natural functioning of physical processes and features over a 100 year timeframe, particularly dunes, wetlands and intertidal saltmarsh; and
- j) Protecting geological features; and
- k) Rehabilitating historic landfills and other contaminated sites which are, or have the potential to, leach material into the coastal marine area; and
- l) Redesigning structures that interfere with natural character processes, such as perched culverts that prevent migratory fish access.

Conclusion

I propose that the proposed that the Natural Character Overlay of the proposed District Plan includes Slipper Island: Planning Map 30.

I believe that there should be an opportunity to go into these submission points in more detail.

Submitter

Christina Needham, Slipper Island Resident.

christinaneedham@gmail.com

Proposed Thames-Coromandel District Plan



Submission Form

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

Your submission can be:

- Online:** www.tcdc.govt.nz/dpr
Using our online submissions form
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- Delivered to:** Thames-Coromandel District Council, 515 Mackay Street, Thames
Attention: District Plan Manager (or to the Area Offices in Coromandel, Whangamata or Whitianga)

Submitter Details

Full Name(s) _____	Christina Needham
or Organisation (if relevant) _____	
Email Address _____	christinaneedham14@gmail.com
Postal Address _____	120 Main Road South, Raumati Beach. Kapiti 5032. WELLINGTON
Phone no. (include area code) () _____	04 9050064
Mobile no. _____	021 424425

Submissions must be received no later than 5 pm Friday 14 March 2014

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

PRIVACY ACT 1993

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Your Submission

The specific provisions of the Proposed District Plan that my submission relates to are:
(please specify the Objective, Policy, Rule, Map or other reference your submission relates to)

Part II Section 7 Coastal Environment

My submission is:

(clearly state whether you SUPPORT or OPPOSE specific parts of the Proposed District Plan or wish to have amendments made, giving reasons for your view)

I **support** ☒ **oppose** ☐ *the above plan provision.*

Reasons for my views:

attached 1 page written submission

The decision I seek from the Council is that the provision above be:

Retained ☐ **Deleted** ☐ **Amended** ☐ *as follows:*

include Slipper Island boulder banks in the Coastal Environment Overlay

Proposed District Plan Hearing

I wish to be heard in support of my submission. ☒ **Y** ☐ **N**

If others make a similar submission, I will consider presenting a joint case with them at a hearing. ☒ **Y** ☐ **N**

Signature of submitter C L Needham *Date* 13 March 2014

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. ☐ **Y** ☐ **N**

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 ☐ **Y** ☐ **N**
- b) does not relate to trade competition or the effects of trade competition. ☐ **Y** ☐ **N**

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Section 7 Coastal Environment

North and South Boulder Banks, Slipper Island.

The Boulder Banks on Slipper Island are a significant coastal landscape and they form a unique coastal structure.

I note (section 7.1.2) states : **The District is a diverse area, with breath-taking scenery, dramatic landscapes, a nationally significant surf break and world-class beaches along its 400 km coastline.** The boulder beaches of the island are unique to the region and possibly the only one of its kind in New Zealand. In Nelson, NZ , is an example of a boulder bank, albeit of a different scale.

I note (section 7.1.2) states: **The Coastal Environment also contains indigenous ecosystems and habitats that are particularly sensitive to modification.** The boulder beaches on the island are the few remaining habitat areas suitable for lizards, in particular the lizard species *Leiopisma smithi*.

I note (section 7.2.1) states: **The protection, preservation, restoration and enhancement of the special values and characteristics of the Coastal Environment need to be carefully balanced with meeting people's inherent interest in using the Coastal Environment as a place to work, live and play.** The north and south boulder banks of Slipper Island have merit to be included in the Coastal Planning Overlay.

I agree with and support **Objective 1 Subdivision, use and development in the Coastal Environment:**

- **Maintains the integrity, form, functioning and resilience of the Coastal Environment.** Any earthworks related to farming activities or other uses, on the island must be with the intent to maintain the integrity, form and function of these significant coastal structures. Removal of any boulders must be prohibited.
- **Preserves the natural character, natural features and landscape values of the Coastal Environment.** Recognition of the natural landscape values, and role in the coastal environment, is required to give protection to the north and south boulder banks on the island.
- **Recognises the relationship of tāngata whenua with the Coastal Environment.** Local iwi.
- **Protects and enhances historic heritage values.** Natural coastal features are always at risk of intentional and unintentional damage, especially by humans desire to remould and develop the landscape. Every boulder removed from the boulder bank is a step towards its destruction. By including these boulder bank coastal structures in the coastal environment overlay provides them with protection.

I propose that the north and south boulder banks (beaches) on Slipper Island be included in the proposed District Plan Coastal Environment Overlay. (Planning Map: 30 Slipper Island).

I believe there should be an opportunity to go further into these submission points.

Christina Needham, Slipper Island Resident.

christinaneedham14@gmail.com

Proposed Thames-Coromandel District Plan



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or Organisation (if relevant) _____

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Phone no. ()
include area code 04 9050064

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Your Submission

The specific provisions of the Proposed District Plan that my submission relates to are:
(please specify the Objective, Policy, Rule, Map or other reference your submission relates to)

Section 8 Historical Heritage

My submission is:

(clearly state whether you SUPPORT or OPPOSE specific parts of the Proposed District Plan or wish to have amendments made, giving reasons for your view)

I **support** ☒ **oppose** ☐ **the above plan provision.**

Reasons for my views:

Attached 4 page written submission

The decision I seek from the Council is that the provision above be:

Retained ☐ **Deleted** ☐ **Amended** ☐ **as follows:**

I propose listed Slipper Island group of significant archaeological sites are included in the District Plan
Archaeological Sites Schedule.

Proposed District Plan Hearing

I wish to be heard in support of my submission. ☒ **Y** ☐ **N**

If others make a similar submission, I will consider presenting a joint case with them at a hearing. ☒ **Y** ☐ **N**

Signature of submitter C L Needham **Date** 12 March 2014

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. ☐ **Y** ☐ **N**

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 ☐ **Y** ☐ **N**
- b) does not relate to trade competition or the effects of trade competition. ☐ **Y** ☐ **N**

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Proposed Thames - Coromandel District Council Plan

Section 8 Historical Heritage***Introductory Comments***

There is clear and abundant evidence, principally in the form of artefacts, present on Slipper Island for significant levels of early settlement by Polynesians (particularly at sites U12/5, U12/9 and U12/12). Moreover, the archaeological remains and Maori traditional history show that occupation of the island was continuous until the late pre-European period, or even the early post-European. The landscape and the sites within it remain well-preserved, particularly compared to many areas on the mainland (especially at the Tairua harbour area). This gives the sites on the island, individually and as a group, a high level of significance, not only regionally but nationally. As a group the archaeological sites on Slipper Island form a significant cultural heritage landscape and so merit protection through the Thames-Coromandel District Plan.

“Archaeological deposits of such an early date have high archaeological values and are highly significant at a national level. Also, they have international significance for the information they contain about the settlement of Oceania.”(Gumbley and Hoffmann 2009)

Section 8.1 BACKGROUND

I note the proposed District Plan (section 8.1.1) states: **The New Zealand Historic Places Act provides ‘blanket’ protection to all pre-1900 archaeological sites.** This protection did not prevent unauthorised works on Lots 16 & 17 site U12/9 in South Bay forming part of a recent proposed subdivision and a small investigation was required.

I note the proposed District Plan (section 8.1.1) states: **The District Plan provides an additional layer of recognition and protection for “significant” archaeological sites and Sites identified on the Planning Maps.** The sites on Slipper Island (planning Map 30) require this additional layer of protection and preservation of the sites.

I note the proposed District Plan (section 8.1.1) states: **Many parts of the District have not been surveyed and more information may become available in the future.** Archaeological sites at Slipper Island recorded by Atwell et al (1975), Rowland (1978) as well as archaeological investigations by others in the 1960's and 1970's have determined that this was a place of early Polynesian settlement. Apart from the Warren Gumbley report (2001) prepared for the Slipper Island subdivision RMA20010301, there has not been any further study on these significant sites. An updated site assessment stating the condition of the sites and identifying threats to all of the sites is critically required.

I note the proposed District Plan (section 8.1.2) states: **Historic Heritage Items have been assessed as meeting the “Criteria for Determining Significance of Natural and Cultural Heritage Resources for Protection” as set out in the RPS.** The sites on Slipper Island individually and as a group rate well against these criteria.

Section 8.2 ISSUES

I note the proposed District Plan (section 8.2.1) states: **Inappropriate subdivision, use and development can destroy, damage or modify an archaeological site... and result in the loss of important historic and cultural heritage values...** The sites on Slipper Island are at risk as determined by the 2009 damage report of site U12/9 South Bay. Also by damage of potential earthworks associated with farming and/or damage by stock.

I note the proposed District Plan (section 8.2.2) states: **Lack of knowledge or lack of recognition of the existence or value of an archaeological site; of a maori cultural site and result in the loss of important and cultural heritage values, adversely affecting the relationship of tāngata whenua with that area.** The early Polynesian settlement site U12/9 South Bay is also an urupa (Burial Ground). It has been recommended that all of the beach archaeological site U12/9 be placed under formal protection.

8.3 OBJECTIVES AND POLICIES

Archaeological Sites; Maori Cultural Sites

I agree with and support Objective 1: **Historical and cultural values of archaeological sites and Māori cultural sites are maintained to retain the identity and integrity of the District's history and culture.** The sites on Slipper Island require additional forms of protection under the TCDC District Plan. I believe and agrees with, the view of *Peter Johnston - Ngati-Hei Trust*, that the entire island needs to have an historic designation or status placed over it, to ensure the sanctity of all the sites regardless of where they are located.

I agree with and support Policy 1a: **Land disturbance activities shall be managed to avoid modification, destruction or damage to the historic and cultural heritage values of known archaeological sites, and Maori cultural sites.** It must be recognised that proposed Public Picnic Facilities and public use of Slipper Island Reserve Lot 3 DP 402362 Home Bay, and use of any other Esplanade Reserve areas at Slipper Island, potentially places significant archaeological sites at risk of damage by foot traffic and forbidden fossicking.

I agree with and support Policy 1b: **Any unidentified or unknown archaeological sites or Māori Cultural site, where land disturbances occurs, shall be managed in a way that avoids damage or destruction until the site or area's historic or cultural heritage value is assessed.** It is highly likely unrecorded sites of significant archaeological value on Slipper Island are at risk of unintentional and intentional disturbance and damage.

I agree with and support Objective 2: **Subdivision, use and development shall maintain the relationship of Māori with archaeological sites, and Māori cultural sites.** Local iwi are to be included in any management plan or restoration of sites planning, an example being beach midden sand dune replanting.

I agree with and support Policy 2a: **Subdivision, use and development shall provide for the protection of historic and cultural heritage values of archaeological sites and Māori cultural sites and the relationship of iwi and hapū with those sites.** Slipper Island subdivision RMA20010301 consent condition for three areas containing Maori pa sites (U12/2, U12/3 and U12/4) are subject to conservation covenant 6030870.4. However, monitoring and enforcement of this covenant is poor, moreover there is no reserve committee or management plan for these areas or the other reserves on the island.

I agree with and support Objective 3: **The District's historical identity is maintained and enhanced.** The sites on Slipper Island, individually and as a group, are not only highly significant at a regional level, are also significant on a national level. Currently, as events have shown, these are at risk.

8.4 NON-REGULATORY METHODS

I note the proposed District Plan (section 8.4.1) states: **The council will have an up to date heritage strategy.** I believe the TCDC must include the recorded NZAA sites on Slipper Island in schedule **A1.1 ARCHAEOLOGICAL SITES SCHEDULE Table 1 - Archaeological Sites** under the proposed District Plan to provide an up to date heritage data base.

A1.1 ARCHAEOLOGICAL SITES SCHEDULE

I agree with and support proposed District Plan (A1.1) that states: **Historic heritage cannot be replicated or replaced, as it is a result of past human activity, and consequently is susceptible to any physical change that may reduce or destroy the qualities that contribute to its significance. Landowners may unwittingly damage heritage values, such as through additions and alterations to buildings or siting fences on archaeological sites.** The settlement in Home Bay is build on and around the highly significant site U12/5 where evidence for early Polynesian settlement has been found. This area is under constant threat of being disturbed and damaged. An unrecorded minnow lure "*Te Taonga O Nora*" discovered by Slipper Island Resident Nora Needham, was as a result of earthworks around the vicinity of site U12/5.

Page 3 of 4

I **propose** the following archaeological sites are included in the District Plan Archaeological Sites Schedule (Planning Map 30: Slipper Island):

Slipper Island New Zealand Archaeological Association site records:

NZAA site number: U12/1 Pa

Description of site: Ridge-crest pa at Fortress Point overlooking eastern Bay. L-shaped ditch, several undoubted pits and a number of terraces.

NZAA site number: U12/2 Pa (*Conservation Covenant (D) (Lot 15)*)

Description of site: Headland pa at south end of South Bay. Single ditch system, central platform with terraces and possible pits.

NZAA site number: U12/3 Pa (*Conservation Covenant (F) (Lot 14) (Lot 4 DP402362)*)

Description of site: Headland pa, south end of Home Bay. Two transverse ditches and several terraces.

NZAA site number: U12/4 Pa (*Conservation Covenant (E) (Lot 17)*)

Description of site: Headland pa, northern end of South Bay. Double ditch and bank system with inner terraces surrounding a central platform. One pit outside the outer ditch and a number inside. Shell midden and obsidian.

NZAA site number: U12/5 Midden/Workshop Area

Description of site: Inland of present sand dunes, covers and area of at least 1,700 sq.m, Non concentrated and dispersed. Shellfish, Mayor Island Obsidian and Tahanga basalts. Utilised bone, fishhooks and fishhook tabs.

Home Bay settlement of house and associated farm buildings partly cover the midden. Midden is exposed around the house, under fence lines and in the cattle race running from the house to Home Bay wharf.

NZAA site number: U12/6 Pa

Description of site: Ridge crest pa on western cliff face, northwest of North Swamp, overlooking Home Bay. Probably L-shaped ditch associated with terraces and pits.

NZAA site number: U12/7 Pa

Description of site: Pa at end of high spur, north end of crater Bay. Terraces and four pits plus two transverse ditches.

NZAA site number: U12/8 Pa

Description of site: Headland pa on south east portion of Island. Two transverse ditches, platforms, terraces, pit and midden.

NZAA site number: U12/9 Midden / Oven

Description of site: Shell midden extends along South Bay and sand dunes.

NZAA site number: U12/10 Pit/Terrace

Description of site: Boulder strewn terraces on slope looking over south swamp

NZAA site number: U12/11 Agricultural / Pastoral

Description of site: Stone wall remains. Possibly European? Located to the east of swamp pa U12/17.

NZAA site number: U12/12 Midden / Oven

Description of site: Shell midden above boulder beach north of Home Bay.

NZAA site number: U12/17 Pa

Description of site: Possible swamp pa.

Page 4 of 4

Conclusion comments

This group of archaeological sites on Slipper Island form a significant cultural landscape at a regional and national level.

I **propose** the above listed NZAA sites, that have clear and abundant evidence of early Polynesian settlement, are included in the TCDC proposed District Plan Archaeological Sites Schedule. This is to provide an additional layer of recognition and protection.

I believe that there should be an opportunity, including the subsequent hearing, to go into these submission points in more detail.

I wish to be **heard** at the hearing.

References

Atwell E.G., J.R.H. Spencer, G.F. Puch and P.R. Moore 1975. Archaeological site survey of Shoe Island and the Slipper Island Group. *Tane*, 21: 21-90

Gumbley. W (2001) An appraisal of archaeological issues relating to the proposed subdivision of Slipper Island and an assessment of affects on archaeological values. *Heritage Resource Management Consultant*.

Gumbley W. and Hoffmann A. 2009. Site damage report: U12/9, South Bay, Slipper Island. *CFG Heritage Ltd*.

Rowland, M.J. 1978. Investigations of two sites on Slipper Island. *New Zealand Archaeological Association Newsletter*, 21(1): 31-52

Conservation Covenant 6030870.4 pursuant to Section 77 Reserves Act 1977

Submitter

Christina Needham.
Slipper Island, **Resident**.

120 Main Road South, Raumati Beach. Kapiti 5032. WELLINGTON.

christinaneedham14@gmail.com

Proposed Thames-Coromandel District Plan



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Submitter Details

Full Name(s) _____	Christina Needham
or Organisation (if relevant) _____	
Email Address _____	christinaneedham14@gmail.com
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Your Submission

The specific provisions of the Proposed District Plan that my submission relates to are:
(please specify the Objective, Policy, Rule, Map or other reference your submission relates to)

Section 11 Significant Trees

My submission is:

(clearly state whether you SUPPORT or OPPOSE specific parts of the Proposed District Plan or wish to have amendments made, giving reasons for your view)

I **support** ☒ **oppose** ☐ *the above plan provision.*

Reasons for my views:

Attached 2 page submission and photo of Abe's Tree

The decision I seek from the Council is that the provision above be:

Retained ☐ **Deleted** ☐ **Amended** ☐ *as follows:*

Include Abe's Tree in the proposed District Plan

Proposed District Plan Hearing

I wish to be heard in support of my submission. ☒ **Y** ☐ **N**

If others make a similar submission, I will consider presenting a joint case with them at a hearing. ☒ **Y** ☐ **N**

Signature of submitter C L Needham *Date* 13 March 2014

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. ☐ **Y** ☐ **N**

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 ☐ **Y** ☐ **N**
- b) does not relate to trade competition or the effects of trade competition. ☐ **Y** ☐ **N**

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Proposed Thames - Coromandel District Council Plan

Section 11 Significant Trees

Abe's Tree at Abe's Point, Slipper Island, is a magnificent Pohutukawa specimen, that holds its own in stature. The tree, when in flower, embraces the southern end of Home Bay in a brilliant hue of red. It is highly significant in amenity to this part of the island. The tree holds high historical values in that it is a remnant of coastal forest vegetation that existed on the island pre-historic Maori occupation.

This tree is located on the southern boundary of Slipper Island Reserve Lot 3 DP 402362 Home Bay and on the northern boundary of conservation covenant 6030870.4 (Lot 4 DP402362), Planning Map: 30 Slipper Island.

I note that (section 11) states: **The Significant Tree Schedule identifies trees that significantly contribute to public values such as heritage, amenity or as a landmark.** Abe's Tree fits this criteria.

I also note that (section 11) states: **The significance of the tree primarily relates to the condition and amenity of the tree, but significance may also come from the tree's stature, or the historic or scientific values it holds.** Abe's Tree fits this criteria.

I propose to include **Abe's Tree** located at Abe Point, Slipper Island, in the Proposed District Plan Significant Tree Schedule, Planning Map: 30 Slipper Island. This is to identify, recognise and protect this tree in the Recreation Area Lot 3 DP 402362 Slipper Island.

11.1

I believe that Abe's Tree should be included in the Proposed District Plan, Appendix 3, Significant Tree Schedule, based on the information that it can be identified to fit the following selection criteria:

1. Notable significance – the tree is of a significant age or exemplifies significant stature, vitality or form. This tree is highly likely to be remnant of the Coastal Forest that covered the island pre-Maori occupation.

2. Botanical or scientific significance – the significance of the tree because of its rarity, its representativeness, its value as a native tree or its unusual genetic form. Magnificent Pohutukawa specimen.

3. Historical significance – the tree is associated with historic events, people and significant periods in the development of the District. Highly significant Historical Coastal Forest.

4. Cultural and spiritual significance – the tree has significant customary or spiritual value to a particular group of people. Needham Family - Remembrance of Mr. Abe Needham, father of 14 Children, and our Mother Mrs. Nora Needham, who brought Slipper Island in 1971 and brought up their young children out there.

5. Landmark significance – there are visual and spatial qualities which make the tree an important landscape feature of a particular area. See attached photo.

6. Functional significance – the tree has a significant physical and ecological function which may include amenity or climatic benefits (e.g. shade, screening, shelter and temperature control). Size of shade shadow large - only shade on the reserve and people flock to get in its shade. Potential damage to roots and lower branches.

7. Amenity values - the qualities and characteristics of a tree that contribute to people's appreciation of it. Abe's Tree is a truly magnificent specimen of a healthy happy tree growing in its chosen spot.

11.2 ISSUES

I note that (section 11.2.1) states: **Significant trees are at potential risk from land intensification, subdivision and land use activities. The removal, modification or degradation of a tree can result in a reduction of amenity values, the quality of the environment and in some cases, the irreversible loss of important historical or cultural values.** The eminent development of Public Picnic Facilities at the Slipper Island Reserve, Home Bay will expose this tree to greater visitor numbers than ever before. There is the risk of damage and breakage of low slung branches from persons walking along the branches.

Conclusion

I propose to include Abe's Tree in the TCDC Proposed District Plan Significant Tree Schedule.

I believe that there should be an opportunity to go into these submission points in more detail. I intend to submit a further submission on these submission points.

There are other groups of significant trees on the island that should also be included in the proposed district plan. These trees can be listed in a further submission.

SUBMITTER

Christina Needham. Slipper Island Resident.

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