



Summary of decisions requested - Plan Change 1F (Modification of Indigenous Vegetation and Update to Key Indigenous Tree Species List) to Operative Kapiti Coast District Plan 2021

Submitter No.	Submitter Name	Address for Service
S1	Director-General of Conservation	RMA Shared Services Department of Conservation Private Bag 3072 Hamilton 3240 Attn: Ashiley Sycamore Email: asycamore@doc.govt.nz
S2	Waka Kotahi – New Zealand Transport Agency	Waka Kotahi NZ Transport Agency Level 7, The Majestic Centre 100 Willis Street PO Box 5084 Wellington 6011 Attention: Mike Scott Principal Planner – Poutiaki Taiao Environmental Planning Environmentalplanning@nzta.govt.nz Mike.scott@nzta.govt.nz
S3	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) 205 Victoria Street Wellington 6011 Attention: Amelia Geary – Regional Conservation Manager a.geary@forestandbird.org.nz

Submission Point	Provision	Position	Decision Sought	Reasons
S1.1	ECO-R6, standard 1.1(ii)	Amend	<p>Amend standard 1.1(ii) as follows:</p> <p><i>the tree(s) presents a demonstrable imminent risk of serious harm to people or property a building(s) or risks significantly damaging surrounding protected vegetation; and</i></p> <p>Any other amendments that may be necessary or appropriate to address the Director-General's concerns.</p>	<p>The requested amendment to ECO-R6 Standard 1.1(ii) would further strengthen this provision to ensure the protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna. The Department of Conservation's technical expert considers that dead and dying trees are a natural and essential component of indigenous forests and shrublands. Dead trees provide other benefits to an area of indigenous vegetation, or habitat. Older trees have epiphytes or parasites, and provide habitats for many indigenous fauna including insects, lizards, and birds. Dead wood is a food source and source of nutrients for the habitat. Light gaps caused by dead trees are a natural phenomenon. Dead wood, either standing or fallen, is a natural and essential component of many forest and shrub ecosystems. The Director-General therefore does not support the risk to surrounding protected vegetation as a reason for removing a dead or diseased tree and it is requested that this aspect of the standard is deleted.</p>
S1.2	ECO-Table 1	Support	Retain as notified.	<p>The amendment to ECO-Table 1 is supported to ensure the smaller coastal species of Kānuka is protected under the general indigenous vegetation protection rules and standards.</p>
S2.1	All of Plan Change 1F.	Support	Retain as notified.	<p>Waka Kotahi supports the changes to the provisions regarding the modification of indigenous vegetation, as set out in the documentation.</p>

Submission Point	Provision	Position	Decision Sought	Reasons
S3.1	ECO-R6	Amend	Make Rule ECO-R6 a Restricted Discretionary Activity.	<ol style="list-style-type: none"> <li data-bbox="1391 300 2029 464">1. Controlled activity status, no matter how tightly controlled, will ultimately lead to incremental loss of habitat over time to due to Council having no ability to retain discretion to decline consent. <li data-bbox="1391 504 2029 839">2. Acknowledge that the amendments to the rule seek to significantly reduce the identified issues regarding the extent of adverse effects on indigenous biodiversity possible under the existing wording of the rule, while still enabling people to provide for their health and safety where this can be clearly demonstrated and agreed to by the Council. However, Forest & Bird still requests council retain an ability to decline consent. <li data-bbox="1391 879 2029 1110">3. It would be quite easy to find an arborist to recommend the outcome desired by the applicant who has a vested interest in felling trees that need to present 'a demonstrable imminent risk of serious harm to people or a building(s) or significantly damaging surrounding protected vegetation.' <li data-bbox="1391 1150 2029 1353">4. If Council has reason to suspect that removal of the trees is not necessary to address an imminent risk to people and property, then what? Forest and Bird would not like to see this outcome as a result of keeping ECO-R6 a controlled activity.

Submission Point	Provision	Position	Decision Sought	Reasons
				<p>5. Forest & Bird is concerned that the rule enables the felling of two trees every five years, enabling the incremental loss of habitat over time. While this might sound small scale, the removal of two trees, particularly in the coastal environment, could have significant impacts.</p>
S3.2	ECO-R6	Amend	Amend ECO-R6 to ensure it captures rare and threatened trees that occur in the district.	<p>1. The section 32 report noted that none of the species listed as a rare and threatened vegetation species in Schedule 3 of the District Plan are tree species. This is actually very concerning. There are many trees in the district that are rare or threatened that should be included in this Schedule: large-leaved milk tree (<i>Streblus banksii</i>) and swamp maire (<i>Syzygium maire</i>) to name a few.</p> <p>2. Forest and Bird would like to see Rule ECO-R6 amended to capture all rare and threatened vegetation in the District, not just limited to the incomplete list in Schedule 3. It could be that Schedule 3 could be amended to achieve this.</p>