

Friends of  
Taupō Swamp  
& Catchment

# Friends of Taupō Swamp & Catchment Submissions 2020

Form 5  
Submission on publicly notified proposal for a plan

To Porirua City Council

Name of submitter: **Friends of Taupo Swamp & Catchment Inc**

This is a submission on the following on the following proposed plan:

**PORIRUA CITY COUNCIL CITY-WIDE DISTRICT PLAN REVIEW**

The specific provisions of the proposal that our submission relates to are Parts A,B C as below

## **Part A: Whitireia Park**

### **1. We submit that all of Whitireia Park must be protected from inappropriate subdivision, use and development.**

All areas of Whitireia Park are part of the coastal environment because they have elements and features that contribute to the natural character, landscape, visual qualities or amenity values and therefore any provisions for development are subject to section 6(a) of the Resource Management Act 1991 (the RMA).

### **2. We fully support all land in Whitireia Park continuing to be zoned Open Space.**

Whitireia Park is a prominent headland on the southern side of the entrance to Te Awarua-o-Porirua Harbour. The Park includes all land owned by the Crown, some areas owned by Ngāti Toa, the golf course and the Radio New Zealand (RNZ) land which leases most of the land to DOC and areas within the boundary of the park owned by Porirua City Council. The Park is open to the public to wander at will. It is used by a wide range of people from Porirua and the wider Wellington Region for a variety of activities. It has highly significant cultural, recreation, biodiversity, landscape, educational and open space values.

### **3. We submit the bulk and location standards need to be amended so they are consistent with objective Open space Zone – 02 (OSZ-02).**

The zoning of Open Space does not limit the number of buildings – any number is possible so long as each is less than 50m<sup>2</sup> and the combined coverage is no more than 5 percent. Under the permitted standard relating to site coverage and floor area, up to 520 buildings could be built on the Radio New Zealand land. This would be contrary to the objective OSZ-02 'a low level of development and built form with few structures to support passive and active community activities'.

### **4. We submit that all of Whitireia Park, except small footprints of modified landforms in the Golf Club and RNZ mast and building area should be included in the ONFL policy overlay.**

Our reasons for seeking inclusion are as follows:

- The area is open space widely used by the local community for recreation
- The area is widely recognised and valued by the community and is highly visible from the road, tracks and many other areas of the park
- The area is highly representative of natural landforms and demonstrates the typical gentle rolling slopes and watercourses of this district.
- The area has numerous springs and seeps which are the headwaters of Te Onepoto Stream which flows down the valley to Porirua harbour.

- The seeps and wetlands associated with this area have naturally regenerated since grazing ceased in 2010. It is rare to find seepages and their associated wetlands vegetated with NZ native species in the Wellington region.
- This area is an important educational resource for the community, including schools, to study the natural function and importance of protecting the headwaters of streams.
- The area is culturally and spiritually significant to many people in the Titahi Bay and wider Porirua community.

**5. We submit all of Onepoto stream should be included in SNA 134 and connects to SNA 138**

- Onepoto stream is site of significance to Ngāti Toa Rangātira
- Onepoto stream begin as spring-fed seeps in the headwaters of the stream and flows all the way to Onepoto estuary. Although a small area of the stream is piped in the golf course, the stream is still hydrologically linked all the way from the headwaters to the sea.
- This stream has good native fish values

**6. We support SNA 223 Whanake-Thornley Street**

However, there is no description in schedule 7 for it. A description should be added to Schedule 7.

**7. We support SNA 136**

Additional areas marked in yellow on the map should be added because they have been planted with indigenous species and have naturalised.

**8. An additional area should be added to SNA 134 Te Onepoto estuary (see map in yellow)**

The vegetation surrounding Onepoto Estuary comprises *Juncus kraussii* subsp. *australiensis*, *Apodasmia similis*, *Plagianthus divaricatus*, *Phormium tenax* and *Carex geminata*. This is an excellent example of the indigenous vegetation surrounding estuaries.



## Part B: Specific Site – Taupō Swamp and Catchment

### 1.1 Overview

The Wellington Region has one of the lowest amounts of freshwater wetland habitat available in New Zealand due to the extent of degradation and habitat fragmentation. (GWRC, 2015). In 2008 it was estimated that only 2.3% of the pre-human extent of wetland is left in the Wellington Region. The only region that has lost a greater percentage is Hawkes Bay with only 1.9% remaining (MfE, 2007).

### 1.2 Policy Aspects

The GWRC section 32 report for the pNRP and entitled “Wetlands for the Proposed Natural Resources Plan for the Wellington Region”<sup>1</sup> published in July 2015 highlighted that many of the wetlands that endure in the region are degraded. In addition, it confirmed that they continue to be degraded or lost by conversion to agricultural land, changes to their hydrology, construction of adjacent roads, the introduction of invasive weeds and pest animals, and pollution.

The GWRC officer’s section 42A report for the pNRP hearings recommended that Taupō Swamp Complex be elevated from ‘Significant Natural Wetland’ to an ‘Outstanding Natural Wetland’.<sup>2</sup> This was confirmed in the decisions on submissions and is now beyond challenge.

**We submit that all provisions of the C-WPR must be couched so they are consistent with the obligation under Policy P39 of the pNRP to avoid effects on the Taupō Swamp Complex.**

### 1.3 Key Issues

Parts of Taupō Swamp catchment have been identified as the ‘Northern Growth Area’. These surround Taupō Swamp and if developed without strict conditions to contain sediments and nutrients on-site and to prevent hydrological changes to Taupō Swamp, they will have a detrimental effect on the wetland. They will also provide new weed species which can have an adverse effect on the swamp.

### 1.4 Support/Oppose

**We support the following provisions of the C-WPR**

- **Identification of parts of the Taupō Swamp Complex as being SNAs (ie; SNAs 042, 043, 044, 045, 046, and 047) so the C-WPR is consistent with the pNRP.**
- **Acknowledgement that a large part of the Taupō Swamp Complex is an ONFL.**
- **Identification of parts of the Taupō Swamp catchment as being SNAs (eg; SNAs 027 and 030).**

We note that parts of SNA043 and SNA044 are located within Plimmerton Farm and accordingly cannot be identified as SNAs via the C-WPR process. However, parts are also located in the SH One designation corridor and must be included in the SNA policy overlay. Those parts are identified in Figure 1 below.

<sup>1</sup> <http://www.gwrc.govt.nz/assets/Plans--Publications/Regional-Plan-Review/Proposed-Plan/Section-32-report-Wetlands.PDF>

<sup>2</sup> <http://pnrp.gw.govt.nz/assets/Uploads/HS5-Officers-S42A-Report-Wetlands-and-Biodiversity.pdf>



Figure 1: Parts of SNA043 and SNA044 to be included in the C-WPR (outlined in yellow)

**We oppose the following aspects of the C-WPR**

- The C-WPR does not include sufficient provisions to ensure adverse effects on Taupō Swamp from land development within the catchment are avoided, and therefore to ensure that the C-WPR is not inconsistent with the pNRP<sup>3</sup>.
- The C-WPR does not include sufficient provisions to ensure all natural wetlands and areas with indigenous vegetation are retained.
- The C-WPR provisions do not prevent natural wetlands being used to filter sediments or nutrients. Buffer areas around wetlands must be established to provide the filters needed.
- The C-WPR provisions will not ensure that all hydrological functionality of wetlands and drainage topography contributing to Taupō Swamp is retained including base, average, total and peak flows.
- The C-WPR does not include policies requiring all landscaping or gardens within the Northern Growth Strategy area to use only eco-sourced locally appropriate indigenous plants.
- The C-WPR does not include policies to ensure that all new subdivisions within the Northern Growth Strategy area will be pest free. We would ideally like this to include cats.
- The C-WPR anticipates new development but currently Porirua's infrastructure is unable to accommodate it. From what we see there is no indication that future planning is taking account of this.

<sup>3</sup>

Refer section 75(4)(b) of the RMA and Policy P39 of the pNRP.

**We seek adequate amendments to the provisions of the C-WPR so all these points are addressed.**

**We are also opposed to any amendment to the provisions of the C-WPR by way of submissions by others, or by council officer evidence and/or recommendations, that would result in the extent of the SNA policy overlay as it relates to land within the Taupo Swamp catchment being reduced.**

**We are also opposed to any amendment to the provisions of the C-WPR by way of submissions by others, or by council officer evidence and/or recommendations, that would result in natural wetlands not being defined on the policy overlay maps.**

## Part C: 10A The Track Plimmerton – proposed rezoning in the C-WPR

1. There was no specific consultation undertaken about this component of the city-wide plan review. The zoning report claims that the general community engagement undertaken through the Draft District Plan engagement in September 2019 was sufficient. This fails to acknowledge previous case law<sup>4</sup> which has established that, for site specific re-zonings such as this, the council must investigate and decide which persons would be directly affected and what further information should be provided.

***We consider the council should have concluded that all existing residents of Corlett Road are directly affected by this rezoning and that they should have engaged with them directly. Some of our members live on that street (and have been homeowners there for over 30 years) and they are completely unaware of this proposed rezoning document which is imbedded amongst all the information on the PCC website. There has been no community engagement. FOTSC is therefore not at all surprised that there has been no feedback to date.***

2. The rezoning of the land so part of the site is within “General Residential” is inconsistent with the indicative maps included in the Northern Growth Structure Plan and the Growth Strategy 2048 both of which showed the land being zoned ‘rural-residential’.
3. The Council assessment (the rezoning report) included with the notified plan change assumes that certain key aspects of the plan change are a fait accompli; for example,
  - a. this text relating to access tracks through SNAs: “*However, the ECO chapter provides for vegetation clearance for the maintenance of existing driveways*”, and,
  - b. this text about the activity status of a subdivision of land containing a SNA: “*Subdivision of any lot containing an SNA is a restricted discretionary activity.*”
4. Residential subdivision of land which can only be serviced by a wastewater network that has insufficient capacity is not appropriate in this day and age, and is a recipe for further pollution of our waterways when there is a power failure and/or the wastewater detention tanks reach their capacity. Any failure of the existing waste water system has the potential to result in sewage pollution of Taupo Swamp and its connected waterways. The Porirua infrastructure system is already out of capacity and overflows in the vicinity of the southern end of Mana Esplanade on a regular basis.
5. Residential subdivision of land which is not able to be provided with standard roading is not appropriate. If this land was within a greenfield development the Council would be requiring Corlett Road to be formed at ‘Level 4’ which requires a legal width of 21 metres with 15.5 metres of that comprising parking (2.5m), traffic lanes (2x3m), cycle lanes (2x1.5), footpaths (2x1.5m), and an infrastructure berm (1m). Corlett Road has a legal width of only 15m, a carriageway of 7m and a footpath that at best is less than one metre wide. Any subdivision (where it is not infill of existing residential land) should only be provided for where the Council’s current standard for roading can be achieved. This is clearly not possible on this site and further residential development using Corlett Road should not be provided for.
6. Part of the site comprises a SNA – ‘Taupō Swamp West (south) – SNA047’. This wetland is also part of Taupo Swamp Complex which is recognised in the proposed Natural Resources Plan (pNRP) as ‘a waterbody with outstanding biodiversity values’. There are two points in this regard:

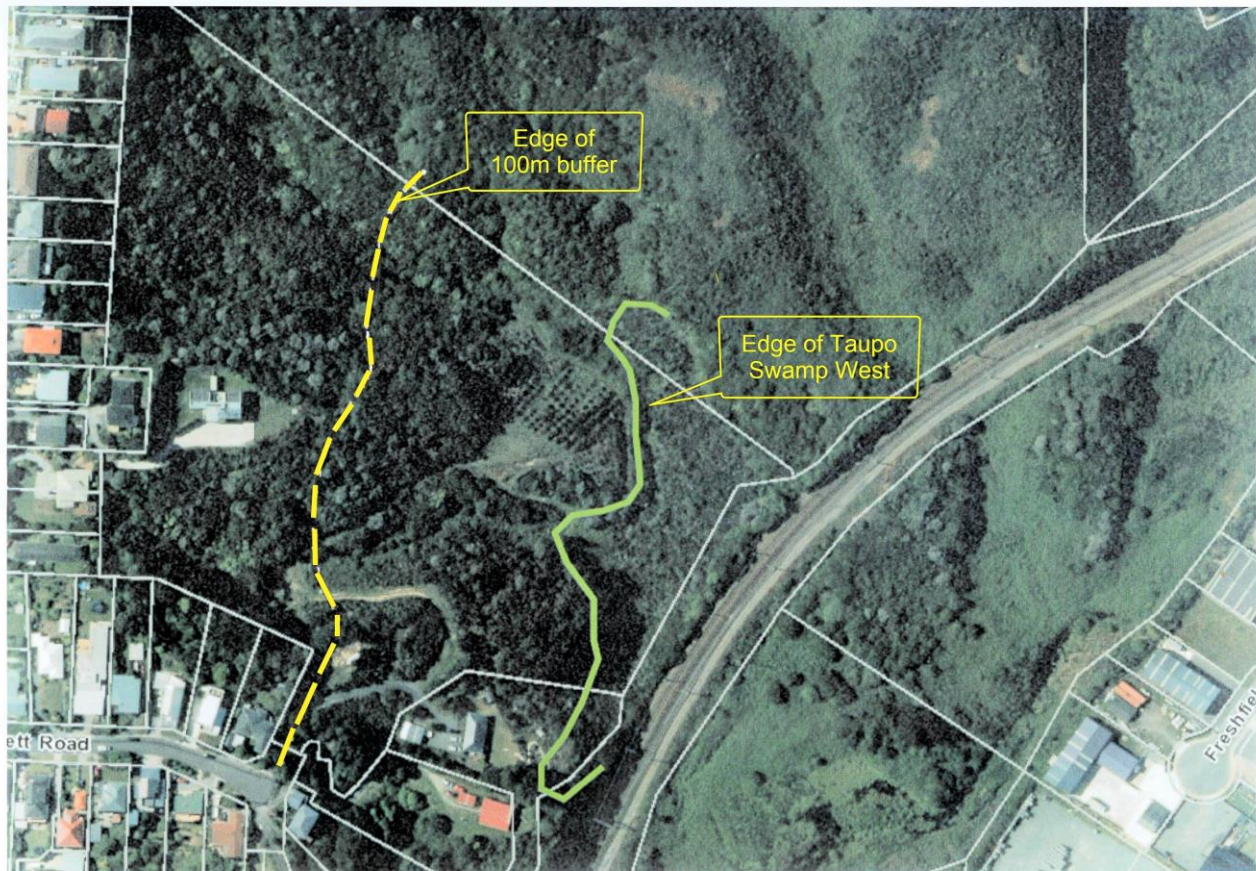
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4

Refer ‘Creswick Valley Residents Assoc. Inc. v Wellington City Council [2012] NZHC 644’.

- a. Policy P39 of the pNRP requires all adverse effects on the Taupo Swamp Complex to be avoided. The Council in the assessment of the zone change proposal is silent about how adverse effects associated with sediment discharge, hard surfacing and changes to the hydrology of catchment, and pest plants and animals will be avoided if the land is rezoned for residential development.
- b. National Environmental Standards for Freshwater (NES-FW) came into effect on 3 September 2003. Regulation 54(c) of the NES-FW says that: *“the taking, use, damming, diversion, or discharge of water within, or within a 100 m setback from, a natural wetland”* is a non-complying activity. Non-complying activity status signals that the activity is not appropriate in that location and that consent is unlikely to be forthcoming. There is no reticulated stormwater network able to service a new development on the land and therefore all stormwater will have to be disposed off to ground, which is an activity potentially prevented under Reg.54 of the NES-FW. Moreover, the 100m buffer around the perimeter of the wetland takes in about half of No. 10A the Track and encompasses all of the house sites for Lots 1 – 7 shown the plan provided by the owner. It is inappropriate from a resource management perspective for the council to consider rezoning land for residential development when each subsequent owner will need consent for a noncomplying activity under a national policy statement and it is probable that that consent won't be granted. Land should only be rezoned when there is certainty that the subsequent use and its effects are appropriate from a resource management perspective.

**The implications of the NES-FW are that there can be no certainty in this case and therefore the land cannot be rezoned.**





We wish to be heard in support of our submission.

If others make a similar submission, we will consider presenting a joint case with them at a hearing.

Person authorised to sign  
on behalf of submitter

**Judy McKoy**

**FOTSC executive**

20 November 2020

Address for service of submitter: 7 Corlett Road, Plimmerton, Porirua 5026

Telephone: 0212639844

Fax/email: judymckoy@xtra.co.nz

Contact person: as above

**FORM 6****NOTICE OF FURTHER SUBMISSION TO PORIRUA CITY COUNCIL PLAN****CHANGE 18 – PLIMMERTON FARM REZONING****PURSUANT TO CLAUSE 8 OF THE FIRST SCHEDULE OF THE****RESOURCE MANAGEMENT ACT 1991**

To: Porirua City Council  
P O Box 50-218  
Porirua

Name: Friends of Taupo Swamp & Catchment Inc (FOTSC)

Address: c/- Judy McKoy  
7 Corlett Road  
Plimmerton  
Porirua 5026

This is a further submission in support of, or in opposition to, certain submissions on the proposed change to the district plan for Porirua: 'proposed District Plan Change 18: Plimmerton Farm' (the pDPC18).

FOTSC is:

- person/s representing a relevant aspect of the public interest; and,
- person/s who has an interest in the proposal that is greater than the interest the general public has

FOTSC is entitled to make this further submission because FOTSC is a voluntary environmental group based in Porirua. The organisation has a growing list of members fo throughout New Zealand and overseas. FOTSC exists in order to protect and enhance the special values of Taupo Swamp, the Taupo Swamp wetlands, and the catchment of Taupo swamp and Taupo Stream. We work with local, regional and national bodies, landowners and the community to advocate for this significant ecological site. The development of Plimmerton Farm, and management of it, will have effects on this wetland system which in turn impact on the ecology of the area.

In light of the evidence seen in the 2 July submissions, particularly those addressed here, FOTSC has no other choice but to now seek the complete withdrawal of pDPC18 as it stands. This stance is aligns with the points already made by FOTSC in the 2 July submission.

In the event that the current Plan Change documents are approved, we urge that there are mechanisms to ensure adverse effects are avoided on Taupo Swamp, the wider Taupo Swamp wetlands & the whole catchment, from development facilitated by the pDPC18. Moreover, that this ecosystem is protected from inappropriate subdivision, use and development. The tables below gives the details of the submissions on which FOTSC is commenting.

Table One: List of these Submissions:

<b>Submitter Name</b>	<b>Submission No.</b>	<b>FOTSC's General Position</b>
Greater Wellington Regional Council	49	Oppose – see Table 2 for reasons
Plimmerton Development Limited	15 and 78	Oppose – see Table 2 for reasons
Royal Forest and Bird Protection Society	117	Support – see Table 2 for reasons
NZ Wetland Trust	60	Support – see Table 2 for reasons
Robyn Smith	107	Support – see Table 2 for reasons
QEII National Trust	128	Support – see Table 2 for Reasons

FOTSC does wish to be heard in support of its submission.

If others make a similar submission, FOTSC might consider presenting a joint case with them at a hearing.

J M McKoy

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Signature (of Judy McKoy as a person  
authorised to sign on behalf of FOTSC)

28 July 2020

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Date

Electronic address for FOTSC: judymckoy@xtra.co.nz  
 Telephone: 021 2639844  
 Postal address: 7 Corlett Road, Plimmerton, Porirua 5026  
 Contact person: Judy McKoy

Table Two: Details of FOTSC's Further Submissions

Original Submitter	Greater Wellington Regional Council			
Submission No	49			
Relevant Provision in pDCP18	Parts of submission FOTSC supports or opposes	FOTSC's Position	Reasons for FOTSC's Position	Relief Sought by FOTSC
Part B(8) of pDPC - earthworks	All parts of submission referring to earthworks provisions	FOTSC opposes GWRC's submission as it relates to Part B(8) of the pDPC	<p>GWRC's submission states that it: <i>".. support(s) the intent of the earthworks provisions, as they seek to protect the receiving environments (Taupō Swamp, Taupō Stream, Kakaho Stream and Te Awarua-o-Porirua) from erosion and sediment, which is consistent with Policy 41 of the RPS."</i></p> <p>FOTSC believes that the phrase "seek to protect" is clearly unambitious and inconsistent with the stronger imperatives in the RMA and the higher-level planning documents which actually <u>require</u> protection and/or avoidance. In this regard FOTSC notes that Policy 39 of the proposed Natural Resources Plan requires adverse effects on Taupo Swamp Complex to be avoided.</p>	FOTSC asks that all aspects of GWRC's submission relating to Part B(8) of pDPC18 be rejected unless they will achieve the outcome intended with Policy 39 of the pNRP of avoiding adverse effects and in respect of potential erosion and sediment discharge.
Part B(4) of pDPC - stormwater	All parts of submission referring to stormwater provisions	FOTSC opposes GWRC's submission as it relates to Part B(4) of the pDPC and as far as it relates to hydraulic neutrality.	<p>GWRC's submission states that it: <i>".. Strongly support(s) ..... hydraulic neutrality objectives, consistent with Policy 42 of the RPS."</i></p>	FOTSC asks that all aspects of GWRC's submission relating to Part B(4) of pDPC18 be rejected unless they will achieve the

			<p>In this respect FOTSC agrees with Robyn Smith's submission points 107.13 and 107.14. Robyn makes this comment: <i>"This definition (of hydraulic neutrality) does not recognise that urban development may not be 'hydraulically neutral' as far as base-flows are concerned."</i></p> <p>FOTSC is very concerned that additional hard surfacing in the catchment means less water is available for ground water recharge with consequential flow-on adverse effects for Taupō Swamp and Taupō Stream which rely on recharge throughout the year. These effects on stream base-flows will arise from changes to the manner in which land in catchment is used (in terms of construction of hard surfacing, building development, vegetation removal, and earthworks for example) and they are therefore adverse effects that the Council is required, under section 31(1)(a) of the RMA, to manage.</p>	<p>outcome intended with Policy 39 of the pNRP of avoiding adverse effects, and in respect of potential changes to the hydraulic regime in the Taupō Stream catchment.</p>
Part B(7) of pDPC – ecology and biodiversity	All parts of submission referring to identification of significant natural areas (SNA) and wetlands.	FOTSC opposes GWRC's submission as it relates to Part B(7) of the pDPC and as far as it relates to identification of SNA and wetlands	<p>GWRC's submission states that it: <i>".. Support(s) the schedule of SNAs as it is consistent with Policy 23 of the RPS"</i> and <i>"The wetland areas should be consistent with the PNRP areas."</i></p> <p>As FOTSC notes in its submission, we are concerned that the number of wetlands on the Plimmerton farm site has been</p>	<p>FOTSC asks that all aspects of GWRC's submission relating to Part B(7) of pDPC18 and to the identification of SNAs and wetland areas be rejected, unless all wetland areas are identified and wetland-specific policies are developed to ensure</p>

			underestimated and not all wetlands have been accurately delineated	appropriate management, including options for restoration of drained sites.
Part B(7) of pDPC – ecology and biodiversity	All parts of submission referring to removing indigenous vegetation within a SNA and wetlands.	FOTSC opposes GWRC's submission as it relates to Part B(7) of the pDPC and as far as it relates to removing indigenous vegetation.	<p>GWRC's submission states it: <i>"...strongly supports the development of a tracks network to provide public access to these areas (ie:SNAs) ..."</i>. GWRC goes on to suggest a controlled activity status for any application to remove indigenous vegetation within a SNA for the purpose of creating tracks.</p> <p>FOTSC understands that an application of consent to a controlled activity cannot be declined. If GWRC's suggestion was adopted this would send a signal that such vegetation removal is expected and anticipated.</p> <p>This being the case, FOTSC believes GWRC's suggestion is inappropriate and inconsistent with Section 6 of the RMA, and the relevant policies in the Regional Policy Statement.</p>	FOTSC asks that all aspects of GWRC's submission relating to Part B(7) of pDPC18 and to the removal of indigenous vegetation within SNAs and wetland areas be rejected, and that the rules of pDPC18 are structured to only allow removal indigenous vegetation under exceptional circumstances (eg: where human life is at risk) and even then as a non-complying activity.

<b>Original Submitter</b>	<b>Plimmerton Development Limited (PDL)</b>			
<b>Submission No.</b>	<b>15 and 78</b>			
<b>Relevant Provision in pDPC18</b>	<b>Parts of submission FOTSC supports or opposes</b>	<b>FOTSC's Position</b>	<b>Reasons for FOTSC's Position</b>	<b>Relief Sought by FOTSC</b>
The entire pDPC18.	All parts of PDL's submission	FOTSC opposes PDL's submission	<p>PDL supports the pDPC18 because it will allow the company to develop Plimmerton Farm by reclaiming and draining watercourses. PDL claims this is appropriate because: <i>"it has been earmarked as a growth area having been identified for residential development in the Porirua Development Framework 2009, the Northern Growth Area Structure Plan 2014, and more recently, the Porirua Growth Strategy 2048."</i> These documents have been collated outside any RMA process.</p> <p>FOTSC notes that Plimmerton Farm comprises a substantial part of the catchment for Taupo Swamp. Due to the topography of the catchment, reclamation and/or drainage of streams draining to Taupo Swamp is very likely to change the hydraulic regime of the catchment and also very likely to significantly adversely affect the natural values of the Swamp.</p> <p>It is not appropriate to negate the statutory tests in the RMA (in particular the Matters of National Importance – section 6) simply because some previous process outside any RMA process with checks and balances (and with no appeal rights) may have been adopted by the territorial authority promoting the development of the land.</p>	FOTSC asks that PDL's submission is entirely rejected.

<b>Original Submitter</b>	<b>Royal Forest and Bird Protection Society (RFBPS)</b>			
<b>Submission No</b>	<b>117</b>			
<b>Relevant Provision in pDCP18</b>	<b>Parts of submission FOTSC supports or opposes</b>	<b>FOTSC's Position</b>	<b>Reasons for FOTSC's Position</b>	<b>Relief Sought by FOTSC</b>
The entire pDCP18.	All parts of RFBPS's submission relating to: Taupo Swamp; climate change; natural hazards; significant natural areas, ecological values and threats; protection of natural values; earthworks, erosion and sediment control; stormwater; offset and enhancement provisions; and statutory provisions and higher order documents.	FOTSC supports RFBPS's submission.	All the matters raised in RFBPS's submission that FOTSC supports need to be addressed in order to achieve the purpose of the RMA.	FOTSC seeks the complete withdrawal of pDCP18. If PCC is not prepared to withdraw the pDCP18 then in the alternative FOTSC seeks that all the matters raised in RFBPS's submission that FOTSC supports are satisfactorily addressed.



<b>Original Submitter</b>	<b>NZ Wetland Trust (NZWT)</b>			
<b>Submission No</b>	<b>60</b>			
<b>Relevant Provision in pDCP18</b>	<b>Parts of submission FOTSC supports or opposes</b>	<b>FOTSC's Position</b>	<b>Reasons for FOTSC's Position</b>	<b>Relief Sought by FOTSC</b>
The entire pDCP18.	<p>All parts of NZWT's submission relating to:</p> <ul style="list-style-type: none"> <li>the identification, protection, and restoration of wetlands within the Plan Change 18 area.</li> <li>the requirement to avoid adverse impacts on Taupō Swamp from sedimentation, hydrological changes, and increased stormwater contaminants.</li> </ul>	FOTSC supports NZWT's submission.	All the matters raised in NZWT's submission that FOTSC supports need to be addressed in order to achieve the purpose of the RMA.	FOTSC seeks the complete withdrawal of pDCP18. If PCC is not prepared to withdraw the pDCP18 then in the alternative FOTSC seeks that all the matters raised in NZWT's submission that FOTSC supports are satisfactorily addressed.

<b>Original Submitter</b>	<b>Robyn Smith</b>			
<b>Submission No</b>	<b>107</b>			
<b>Relevant Provision in pDCP18</b>	<b>Parts of submission FOTSC supports or opposes</b>	<b>FOTSC's Position</b>	<b>Reasons for FOTSC's Position</b>	<b>Relief Sought by FOTSC</b>
All those provisions of pDCP18 referred to in Section 5 ['Particular Matters Relating to pDCP18 of Interest to Me'] of Robyn Smith's submission.	All parts of Robyn Smith's submission.	FOTSC supports Robyn Smith's submission.	All the matters raised in Robyn Smith's submission that FOTSC supports need to be addressed in order to achieve the purpose of the RMA.	FOTSC seeks the complete withdrawal of pDCP18. If PCC is not prepared to withdraw the pDCP18 then in the alternative FOTSC seeks that all the matters raised in Robyn Smith's submission that FOTSC supports are satisfactorily addressed. In particular FOTSC seeks the same relief specified in Section 19 of Robyn Smith's submission.

Original Submitter	QEII National Trust			
Submission No	128			
Relevant Provision in pDCP18	Parts of submission FOTSC supports or opposes	FOTSC's Position	Reasons for FOTSC's Position	Relief Sought by FOTSC
Whole Plan Change	Supports all parts	FOTSC supports QEII National Trust's submission. Two points in particular are noted here:	<p>The Management Plans outlined in PC18 do not require specific environmental outcomes, rather ' ... require that effects are <u>minimised</u> and that specific actions are taken only <u>where possible</u>. It is not possible to conclude, based on this approach, that significant natural areas and the receiving wetland environments will be protected and effects avoided'.</p> <p>Our own feedback tells us that there are deep concerns out there about the perceived conflict of interest of the Porirua City Council (Council) in this Plan Change process. PCC entered a MOU with PDL regarding conduct of the</p>	<p>FOTSC concurs with QEII in that 'the overall outcome sought by this (QEII) submission is that development of Plimmerton farm occurs within the capacity of the site and receiving environment, rather than being driven by commercial outcomes that require a particular housing yield'.</p> <p>FOTSC urges that the Plan Change <u>be revisited to work within the site's natural capacity to absorb land use change</u>.</p> <p>FOTSC concurs with QEII National Trust in that we submit that 'the Council's evidence and its response should be considered in light of this compromising agreement with PDL. The Council's position is not independent'. Council's role</p>

			<p>PC18 process. The MOU describes how PDL and PCC will work together to meet the commercial requirements (ie profit) of the developer in the first instance, with the environmental constraints of the locale coming second. The fact that the developer has agreed to pay the costs of the Plan Change <u>only if</u> Council makes the mutually agreed Plan changes necessary for a commercially viable outcome is giving rise to distrust and a level of community cynicism in this process.</p> <p>Despite this, FOTSC continues to be overwhelmed with positive feedback, support and the number and quality of submissions we are seeing.</p>	<p>in the Plan Change process is helping PDL achieve its commercial objectives.</p>
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J.M. McKoy  
 Friends of Taupo Swamp & Catchment (FOTSC)  
 28 July 2020

**MEMORANDUM RELATING  
to a  
DRAFT REPORT  
by the  
HEARING PANEL**

**Friends of Taupo Swamp & Catchment Inc**

**10 December 2020**

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## MAY IT PLEASE THE PANEL

1. This Memorandum is filed in relation to proposed change to the District Plan for Porirua – Plan Change 18 – Plimmerton Farm.
2. We (FOTSC) have filed a submission and further submissions on the plan change.
3. The Panel has issued a minute dated 6 August 2020 and given directions about the hearing process and its management. As far as a draft of the Panel's reporting obligations to the Minister are concerned, at Clause 14.1 the Panel has stated:

*“In accordance with the Minister's direction the Hearing Panel will release a Draft Report to submitters for comments limited to identification and correction of minor or technical errors or omissions. This is not an opportunity for comments on the Hearing Panel's recommendation to the minister or the reasons for that recommendation. Also, due to time constraints there will be limited time for the comments. To enable efficient review of the comments by the Hearing Panel a table for such comments will be provided by the Hearing Panel closer to the time.”*

4. We are in receipt of an email from Porirua City Council's hearing administrator dated 3 December 2020 to which was attached a draft of the Panel's report to the Minister (the Report), and advice that the Panel's seeks comment about the Report but that those comments should be limited to: *“identification and correction of minor and technical (including legal) errors or omissions only.”*

## OMISSIONS

1. The Report omits to give any acknowledgement or recognition to lay experts.
2. The Report omits to include a list of appearances of experts, along with their credentials.
3. Section 14.6 of the Report refers to 'discussion during the hearing'. The Report omits to refer to evidence about landscape matters except for that given by the council witnesses. This being case, evaluation of Mr Warburton's evidence (for example, Para. 68 – 73) is omitted.
4. The Report omits to include an overview of the composition of the submitters: for example; the proportion who are private individuals, NGOs, companies, Residents' Associations, local, regional and national environmental groups etc; the proportion of submitters opposed, neutral or support; etc. The fact that over 90% of submitters opposed the Plan Change is not seen as worthy of comment. In the very early stages when PCC was seeking an SPP process from the Minister, the Developers and

Porirua City Council staff engaged with Friends of Taupo Swamp & Catchment with both onsite visits to Plimmerton Farm, correspondence and meetings at which key contractors took part. That dropped off. However, our membership has remained active and engaged at every stage of the Plan Change process. FOTSC is the only organisation ever to have all the landowners in the Catchment in the same room at the same time, all with an interest in conserving and advocating for the range of values inherent in that land. The amount of interest and concern coming to us as the local 'go to' organisation saw us encourage submitters, connect experts, hold many meetings. From such input, we spent considerable time and effort on our website so that the concerns we were hearing about the proposed Plan Change could be voiced. FOTSC was not alone in this- other voluntary groups such as PHAACT, GOPI, Forest and Bird similarly invested heavily in engagement with their membership over a period of around two years in the lead up and during the Hearing process - and continue to do so. They are invisible in the Report.

In short: Any perceived value attached to such a high level of considered **community engagement** and response from FOTSC, and others, has been omitted from the Panel's Report.

5. Sections 10.6 – 10.9 of the Report refer to PCC's consenting role with respect to earthworks. At Para. 10.9 the Report says: *That agreement fundamentally changed the scope of the earthworks discussion ...*" The Report fails to record or acknowledge the contrary opinions by other experts, and that fact that other experts were not in 'agreement'.
6. The Report omits an explanation for the discrepancy between the 'urgency' and 'tight time frames' which were mentioned several times at the hearing and also in various correspondence, and the fact that under the Minister's direction the delivery of the Panel's report to the Minister could have been as late as 23<sup>rd</sup> March 2021. The latter timeframe would have enabled our organisation and other interested submitters to fully grasp and respond to the Panel Report - released just 7 days before comments closed on December 10<sup>th</sup> 2020. At this time of the year we see this as an unfair burden on submitters. And it has not enabled our members to respond in time with a more detailed memorandum.

### Summary

7. FOTSC would like to see these omissions seriously considered, and look forward to an amended Report.

Judy McKoy

Bill McAulay

On behalf of the members of Friends of Taupo Swamp & Catchment Inc

[www.tauposwamp.org](http://www.tauposwamp.org)



# Friends of Taupō Swamp & Catchment

**Plan Change 18- Plimmerton Farm.**

**Hearings**

**Tuesday 13<sup>th</sup> October 2020**

I am here today representing a wide reach of members and interest groups. Friends of Taupo Swamp & Catchment was set up in 2018 with a view to engage with land owners in the Catchment of the Taupo Swamp and all its connected wetlands. This kick-started a multi-year restoration project of the wetland systems owned by the Porirua City Council. It became very clear to us that we had a lot of support for this new organisation, and that our role in advocating for the special values of that area was a move not before time.

Two and a half years ago, Plan Change 18 and the Plimmerton farm zoning soon became a focus.

Our organisation quickly became the nexus of local and national conversations about the proposed Plan Change - forging a wide and eclectic reach of interest and informed comment from all around NZ. We come here today having been informed over a lengthy period by wide ranging input and feedback from key parties. We've talked to a lot of people, including the Developers, and we've actively encouraged members of the community to make submissions.

We are in a unique position as we talk to you today. This Plan Change heralds what is arguably the most significant and far reaching local initiative we have ever encountered, with potential for such a great degree of damage to a unique environmental system.



Whilst engaging with that process, hectares of local wetlands have been cleared of pest weeds, and 4000 eco-sourced stems have been fundraised for and planted by hundreds of willing FOTSC volunteers in the Taupo Swamp wetland system in Plimmerton.

We know that area, and have watched the effects of rain events in that catchment and how the system of connected wetlands there now filters and cleanses the water entering Plimmerton Bay.

We don't have access to funding to hire lawyers. Nor do we have the heft of what is seen as the compromising relationship between Plimmerton Developments (PDL) and Porirua City Council. We can't spend ratepayer money to promote spurious legal arguments about the veracity of experts – some on whom we have relied in order to make our case. We urge the Panel to see past that 'game' of undermining one set of experts on one hand and ignoring the credibility of others as it suits.

Surely, it is not the 'status' of an expert that should matter but the quality of the evidence they present.

***The question is asked time and time again: why is it up to 'us' to prove that the Plan Change is not fit for purpose for any 'site appropriate' development of that land, when it should be the Porirua City Council and the developer who must demonstrate that it can be done, with all the safeguards in place, over a period of around 20 years, and using best available practice?***

## Best Practice?

The phrase 'Best Practice' is scattered throughout the Plan Change documents. We see this as a handy catch phrase for 'we are going to try really hard'. It is meaningless when it can't be quantified, assessed, or driven by the most desirable and proven environmental outcomes for the unique qualities of the Plimmerton Farm site, its steep nature, and its receiving environments.

Porirua City Council planning officers, when asked for examples of what 'best practice' might look like for a similar site in New Zealand, have offered up the Long Bay, Auckland development as the gold standard - 'the establishment of a new greenfield neighbourhood that responds to the natural context and creates attractive residential environments' unquote. And how 'careful planning can provide for growth while respecting the natural environment'.<sup>1</sup>

This is not a 'site appropriate' example of best practice. PCC even acknowledges its shortcomings in that regard. Landforms aside, the development of that sensitive site at Long Bay has a history beset with earlier environmental issues which saw, under existing zoning and the Consents issued at that time, tonnes of sediment enter the adjacent marine reserve. It was the commitment and fortitude of the Long Bay-Okura Park Society (a community body such as ours, which raised \$300,000 to challenge the case) which saw Auckland Council join in the later Environment Court case which overturned a developer's bid to proceed with further plans.

***Relevant Best Practice examples from which we can gain any comfort are simply not there. There are none which give us any assurance that a development such as that proposed for Plimmerton Farm with its uniqueness of land forms, connected waterways, and protected swamp systems will afford the level of protection which the developer and PCC claim they can deliver.***

***In our view the required outcomes in the Minister of the Environment's Statement of Expectations to Porirua City Council cannot be guaranteed.<sup>2</sup>***

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<sup>1</sup> 28 September 2020. Proposed Plan Change 18 Report of pre-hearing meetings Appendix 2: Page 1 APPENDIX 2 Council response to process matters raised

<sup>2</sup> The Resource Management (Directions to Porirua City Council to enter the streamlined Planning process for a proposed change to the Porirua District Plan Change) Notice 2020. 6 May, 2020

## **The limitations of this Plan Change**

This is a Plan Change proposal, and as a framework we acknowledge it has its built in limitations. However, our group asserts that there is not enough detail in that document or the Section 42A Report to assure us of the capacity of the Plimmerton Farm landforms to absorb the level of housing needed to make this development financially viable for the developer. Nor is there enough to give comfort that the issues we raised in our two previous submissions have been satisfactorily addressed.

With regards to detail then- How can Plan Change 18 be recommended unless, with just one example, the onsite wetlands have yet to be delineated? Without such a base line and fundamental agreement (due in part to a very rushed submission process run by Porirua City Council), surely the document cannot be accepted as a reasonable basis for discussion. Let alone for recommendations to the Minister coming from this Panel?

The devil will be in the detail – and that will unfortunately come later. Much will be determined in what we view as the hit and miss approach of an RMA process of setting consents. We see this as a derogation of duty to the consent process. The Panel relying on that process for assurances that this Plan Change can actually avoid short and longer term permanent environmental damage is what we see as ‘kicking for touch’.

***At what stage then, if at all, will we be assured of ‘Best Practice’ in action? And who will be paying- the developer? The ratepayer?***

***In our view the risk of waiting until the consent process unfolds is too great to proceed with the Plan Change. There is not enough evidence to show that its objectives are deliverable, because the detail is just not there.***

***Once again, expectations set by the Minister for the Environment in directions to the Porirua City Council are in danger of not being met. <sup>3</sup> This Plan Change fails to demonstrate that points (b) and (c) can be achieved.***

**The Section 42A report and the subsequent PCC post rebuttal version – revised outcomes, and new (lower) horizons**

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<sup>3</sup> Ibid

We note with concern that there are many instances in the 42A report where the language of the desired outcomes has been watered down from the original Plan Change document.

This trend is apparent throughout.

Examples of this appear prominently in the ecosystem and indigenous biodiversity section of the section 42A Report to do with SNAs <sup>4</sup>. This is an issue close to our hearts and minds, and upon which we have previously submitted. (Especially as their future ownership is still undetermined).

A 'controlled activity status' promoted for the areas of significant natural biodiversity sees identified values are no longer protected, but restored – 'where appropriate'.

Any previous 'enhancement' statements around such sites has well and truly been erased- now we see the Plan 'provide opportunities' for biodiversity offsetting and for protection and restoration.

'Takes into account replaces 'requires'. <sup>5</sup>

'Minimise' has replaced 'remedy' and 'where possible' is a recurring theme.

Subdivision and all other incursions within SNAs no longer 'require' ecological assessments to define any impact of development, but such assessments just need to be 'taken into account'. And earthworks in SNAs are only to be 'minimised'.

Walking and cycling tracks can now be constructed within a wetland, as can roads – the effects and management of which are underlined by further 'where possible', and 'minimising' statements.

There are many judgement calls inherent here, and the feedback we receive raises the question: Who will make these, and when? What proof is there that this proposed development will have better outcomes than other current subdivisions in Porirua?

## **Compliance and monitoring**

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<sup>4</sup> Section 42A Report & Appendices, pp 633 - 640

<sup>5</sup> PCC – PC18 recommended amendments – Post rebuttal version. Appendix 2. 9 October 2020

We hear more concern about compliance failures in and around Porirua than almost any other local issue to do with where we live. The potential for irreversible and severe consequences of failure in any proposed development of Plimmerton Farm is a very hot topic – as it certainly was at the pre hearing meetings in September.

PCC officers were at pains to assure lay submitters that they were now working with GWRC to ‘put right’ the current lack of confidence coming through in the submission process. We were assured that both parties were entering a new regime to deliver a ‘Whaitua flagship’ outcome for the development of Plimmerton Farm.

We as a group have already expressed concerns over what seems so often to be an ‘ambulance at the bottom of the cliff’ scenario in local developments re consent breaches - and frankly I am at a loss to put into words how our group can even contemplate any onsite failures on the land in question, let alone those which could so easily result in severe and irreversible consequences for downstream environments.

Monitoring and Compliance of Consents is a major concern if this development goes ahead – how much effort will be *enough* for a ‘first’ in New Zealand for a development of this type? What trust is there in that process - which is hidden - until things go dramatically wrong?

***What confidence can we have at this planning stage that PCC and GWRC will have the capacity, the resources, the expertise to manage such an acknowledged challenge over a period of some twenty years?***

***What proof is there that the day by day management of this proposed development will be any different from what we have seen in the city to date?***

***With such uncertainties over compliance with any set Conditions, it is our view that the Minister’s Expectations in terms of the protection of ecological values, and the mitigation necessary for the downstream environments cannot be assured. <sup>6</sup>***

## **In Summary**

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<sup>6</sup> The Resource Management ((Directions to Porirua City Council to enter the streamlined Planning process for a proposed change to the Porirua District Plan Change) Notice 2020. 6 May, 2020

Our organisation remains unconvinced that this Plan Change will see the development of Plimmerton Farm occurring within the capacity of the site and the receiving environment.

The concerns we voiced in the two previous FOTSC submissions stand.

Feedback from our members tells us that they see this development as being driven by commercial outcomes that require a particular housing yield for the developer. Porirua City Council has a vested interest in making this happen.

The current planning documents give us no comfort that we would see this development working within the site's natural capacity to absorb land use change – short or long term.

It is up to Porirua City Council to provide credible evidence that they can assure the protections they claim, and from what we have seen so far that has not happened. Quite simply- there is no evidence that the objectives in the Plan Change documents can actually be achieved.

This Plan Change cannot proceed without the detail needed- detail which is not in there. The level of interest and engagement we are witnessing in the local and wider community leaves us with no doubt that this matter will not go away, and that this is an issue which people deeply care about- both from the heart and with the evidence of science to back their commitment to seeing the best outcomes for the land in question, the catchment and the waters of Porirua harbour.

***In our view, the Expectations expressed by the Minister for the Environment in directions to the Porirua City Council cannot be assured. <sup>7</sup>***

***The Plan Change documents fail to demonstrate that points (b) and (c) can actually be achieved.***

**In view of this, Friends of Taupo Swamp & Catchment strongly urges the Hearing Panel Commissioners to recommend turning down this Plan Change**

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<sup>7</sup> Ibid

## Friends of Taupo Swamp & Catchment (FOTSC)

### NOTICE OF SUBMISSION TO PORIRUA CITY COUNCIL

RMA FORM 5 Submission on publicly notified Proposed District Plan Change Clause 6 of the First Schedule, Resource Management Act 1991

1 July 2020

#### **Introduction:**

FOTSC is a voluntary environmental group based in Porirua City. We exist in order to protect and enhance the special values of the Taupo Swamp, the Taupo Swamp wetlands, and the catchment it sits within.

We work with local, regional & national bodies, landowners & the community to advocate for this significant ecological site.

Our work includes community education & engagement through workshops, regular newsletters, our website and social media

<https://www.tauposwamp.org/>

We engage with the key parties who have an interest in future urban development within the catchment

We raise funds for, plan planting and manage the five+ year restoration of the Taupo swamp wetlands owned by Porirua City Council. We plan and manage the thousands of volunteer hours devoted onsite to this each year

We make timely submissions to local & regional bodies on concerns which may impact the FOTSC area

We manage a growing membership database which includes an advisory group across a range of fields of scientific expertise

#### **This submission:**

As the local 'go to' locally based group FOTSC has had an overwhelming interest and demand for information about the proposed Plan Change and its local, regional and national implications.

To cope with this we launched a dedicated page on our website, using just some of the questions which were coming our way <https://www.tauposwamp.org/plimmerton-farm-development>

It was clear to us that people were overwhelmed and daunted by the amount of information available via the PCC website and that the submission form was not very user friendly for some.

FOTSC is aware of many concerns coming from our members, so many in fact that we cannot address them all in this submission. They range across every issue raised in the PCC planning documentation. We are aware that other submitters will be covering points with more expertise and depth than FOTSC is resourced for at this point.

However, it is not only our members who have been approaching us - queries and feedback coming in from around New Zealand has been like an avalanche. There is widespread interest and concern felt about the proposed plan change and what it might mean for the development of that land now and into the future.

**The FOTSC submission is concentrating on four overarching principles. *These are based around water, and around drainage systems within the Plimmerton Farm zone.***

*Taupō Swamp and all wetland arms on Plimmerton Farm, along with Taupō Stream and all tributaries, are intricately connected as parts of a highly functioning ecosystem. Accordingly, for the purposes of this submission we refer to all these collectively under the term 'Taupō Swamp Complex'*

## Overview

The development of Plimmerton Farm and management of it will have effects on this system which in turn impact on the ecology of the area. All these effects will, in turn, affect the quality and ecosystem functioning of Te Awarua-o-Porirua Harbour. In our view, it is imperative that the downstream water and drainage effects from this development are positive and enhance the catchment and harbour ecosystem, especially the Taupo Swamp complex.

We note that strategic objective PFZ-O3 states that subdivision, use and development in Plimmerton Farm will contribute to high water quality of receiving waters including Taupo Swamp, Taupo Stream, Kakaho Stream and Te Awarua-o-Porirua. We applaud that objective however, community feedback is telling us that people want to see:

## Our Points

1. All planning based on good information about the site in terms of its hydrology, biodiversity, flora and fauna. There are various studies and reports. Feedback tells us that they are inadequate for the purposes of evaluating possible impacts of the proposed development. We don't have enough good information. The Blaschke "Plimmerton Farm Plan Change- Ecological Assessment Report" formed the basis for the ecological and biodiversity provisions of the proposed plan change. We are hearing that it falls short in significant areas and is demonstrably inadequate for a development such as this. This is addressed in detail in submissions from Robyn Smith and QEII National Trust



FOTSC members tell us that:

- An acknowledgement of the regional significance of Porirua Harbour – not addressed in the above report
- Accurate delineation of wetlands in the Plimmerton farm zone – underestimated in the report
- The clearing of SNA's – this is not an option for FOTSC members, nor is any offsetting, nor is wetland creation to justify any such clearing.
- The proposed modification of wetland areas is unacceptable to members: some modifications in the plan are proposed for use to retain storm water, & to ensure storm water neutrality in the wider catchment. Some for roading (we hear, wide enough to take buses). We do not accept the inevitable loss of wetlands which will result, nor the resulting irreversible changes to connected water systems on that land
- Loss of spring fed seeps/streams at the top of valleys – these will be the most modified by development on the site. They are nationally recognised as endangered ecosystems

2. Our group wants to see evidence of the very best DETAILED plans as to how adverse effects of earthworks, loss of natural systems etc are going to be managed if the change to Residential and Commercial zoning is accepted by the Minister for the Environment

- We have already noted that strategic objective PFZ-O3 states that subdivision, use and development in Plimmerton Farm will contribute to high water quality of receiving waters including Taupo Swamp, Taupo Stream, Kakaho Stream and Te Awarua-o-Porirua. Community feedback tells us that people rate this very highly. Community discussion is telling us that people are not assured of this outcome given the questions they have about the clarity of mitigation and prevention measures seen in planning documents
- We are hearing concerns that there is lack of any detail on the required earthworks for development. We are also told that the extent of hard surfacing and change to the hydrological regime means the short and long term downstream effects on the Taupō Swamp Ecosystem cannot be quantified - and therefore it is not currently possible to determine the nature, scale and adequacy of preventative or remedial measures.

3. We want assurance that any consents / conditions set down for this development are not only at an optimum level, but that they are rigorously enforced at every step of the way by PCC and GWRC. With insights gained from current Porirua developments FOTSC sees non-compliance with agreed conditions as the major threat to the unique ecological systems within Plimmerton farm

- The development plans show no protection for the ongoing management of any infrastructure associated with newly build waterways ie culverts, stormwater retention ponds, flood attenuation ponds. Nor do they address the issue of the long term ownership & management of the structures associated with waterways. Feedback tells us that the community is very wary of these issues based on current observed development and consent practices in Porirua.

- Community and member feedback tells us that it is critical that any provisions around earthworks, and especially the sign off and application of Erosion and Sediment Control Plans, are followed, monitored and enforced by the Porirua City Council. Any non-performance to these requirements will have severe and possibly irreversible consequences on the wetland ecosystems in the Plimmerton Farm zone and, especially, on the Taupō Swamp Complex. We continue to hear & see worrying incidents of failures of sediment mitigation during construction and following rain events (Transmission Gully, Whitby, Kenepuru Landing, Aotea). Monitoring and enforcement services are ‘starved’ of resources which has meant that every major development in Porirua over the past 30 years has poured sediment into the harbour
- We are hearing that people want to see the freshwater management measures that are recommended in the Te Awarua-o-Porirua Whaitua Implementation Programme (WIP) implemented in the development planning where they fall within the jurisdiction of Porirua City Council and Greater Wellington Regional Council
- There is huge concern about a number of issues, based on current development practices in Porirua - the clearance of vegetation, modifying landforms by earth-working with associated discharges of sediment, and modifying hydrological characteristics of the catchment with hard surfacing, along with infilling and potential diversion of ephemeral and intermittent watercourses . Add to that the need for proven water sensitive design, and hydraulic neutrality that really does the job on that site. The community wants assurance that we get 21<sup>st</sup> century development, not 19<sup>th</sup> century thinking. They want the consent process to reflect that – from start to finish, and in perpetuity. They want the local environment to be a priority not a casualty of any development on Plimmerton Farm
- Community feedback tells us that no new development should be approved unless Porirua’s 3-waters’ infrastructure can accommodate it. There is community wide confusion about this issue, and real concern not only about the current ‘close to capacity’ infrastructure but who will pay for 2000 more households to connect to it

4. We have walked over that land. We want to be assured that the planning process will ensure that wetlands and streams, along with all agreed natural areas are protected in perpetuity, and enhanced where possible. We want to see the establishment of clear responsibilities for the ongoing care and management of such areas at the outset and into the future

- The development concept plans give no guarantee that important ecological sites will be protected. Nor is there any statement about the longevity of covenants, consents, or the long term stewardship of important sites. FOTSC has received a lot of concerned feedback about this.
- The long term lack of commitment of developers and ineffective conditions / serious monitoring of conditions imposed by Council means that any protection of ecological sites can often fail. How can a cash- strapped city like Porirua reassure us about the ongoing management of these?

FOTSC supports the submissions of Robyn Smith, QEII National Trust, PHACCT/GOPI.

**Judy McKoy (FOTSC project management)  
& Bill McAulay (FOTSC Chair)**