



Proposed

Intensification Planning Instrument

SUMMARY OF DECISIONS SOUGHT FOR SUBMISSION 33: The
Fuel Companies | 30 November 2022



PUBLIC NOTIFICATION OF CORRECTIONS AND ADDITIONS TO THE SUMMARY OF DECISIONS REQUESTED ON THE PROPOSED INTENSIFICATION PLANNING INSTRUMENT (IPI) TO THE UPPER HUTT CITY COUNCIL'S DISTRICT PLAN (2004)

Upper Hutt City Council gives notice as required by clause 7 of the First Schedule of the Resource Management Act 1991, of corrections and additions to the Summary of Decisions Requested (Summary of Submissions) by submitter 33: The Fuel Companies who made submissions on the proposed Intensification Planning Instrument (IPI) to the Upper Hutt City Council's District Plan 2004.

The Summary of Decisions Requested by submitter 33: The Fuel Companies on the proposed Intensification Planning Instrument (IPI) can be viewed at letskorero.upperhuttcity.com/planningforgrowth.

The Summary of Decisions Requested and copies of the submissions received can also be inspected at any of the following locations:

- **HAPAI Service Centre**
879 – 881 Fergusson Drive
Upper Hutt
- **Upper Hutt Library**
844 Fergusson Drive
Upper Hutt
- **Pinehaven Library**
Corner of Pinehaven Road & Jocelyn Crescent
Pinehaven, Upper Hutt

If you have any questions, or would like further information about the Intensification Planning Instrument (IPI), please contact us via email planning@uhcc.govt.nz or call **(04) 527 2169**.

Making further submissions

Pursuant to Clause 8(1) of Schedule 1 of the Resource Management Act 1991, the following persons may make further submissions on the IPI as follows:

- any person representing a relevant aspect of the public interest; and
- any person that has an interest in the proposed policy statement or plan greater than the interest that the general public has; and
- Upper Hutt City Council.

Further submissions may be made electronically or in writing to Council in the following ways:

- Online: letskorero.upperhuttcity.com/planningforgrowth
- Email: planning@uhcc.govt.nz

- In person: **HAPAI Service Centre**
879 – 881 Fergusson Drive
Upper Hutt
- Post: **Intensification Planning Instrument**
Upper Hutt City Council
Private Bag 907
Upper Hutt 5140

Further submissions must be completed on the Further Submission Form (Form 6 of the Resource Management (Forms, Fees, and Procedure) Regulations 2003) and must state whether or not you wish to be heard on your submission. A further submission:

- must be in response to a decision requested in one of the original submissions.
- is limited to either be in support of, or opposition to an original submission.
- must provide reasons for support or opposition to an original submission.

Copies of the Further Submission Form (Form 6) are available on Council's website and from Council, or from the Resource Management (Forms, Fees, and Procedure) Regulations 2003. Further submissions relating to corrections and additions to submission 33: The Fuel Companies must be received by **5.00 pm on 14 December 2022**. Further submissions on all other submissions must be received by 7 December 2022.

PLEASE NOTE: In addition to serving a copy of the further submission on Upper Hutt City Council, a copy of the further submission must also be served on the person(s) who made the original submission to which the further submission relates. This must be done no later than 5 working days after providing Upper Hutt City Council with the further submission.

Emily Thomson

Planning Policy Manager, Upper Hutt City Council

Wednesday, 30 November 2022

Address for service: 879 – 881 Fergusson Drive
Private Bag 907
Upper Hutt 5140

Email: planning@uhcc.govt.nz

Telephone: (04) 527 2169

Guide to Submission Summary

The following format is used to summarise submissions received from submission 33: The Fuel Companies.

Submission Point	Provision	Support/Oppose/Seek amendment	Decision Sought	Reasons
Submitter 33				
S33.1				

This document corrects error and omissions made in relation to submission 33: The Fuel Companies and change are shown in **green text**.

Making a Further Submission

Clause 8 of the First Schedule of the Resource Management Act outlines the persons that may make a further submission, being:

- (a) any person representing a relevant aspect of the public interest; and,
- (b) any person that has an interest in the proposed plan greater than the interest that the general public has; and
- (c) the local authority itself.

A further submission must be in support of or in opposition to the submissions that have already been made and which are summarised in this document.

Further submissions should be made in writing, in general accordance with Form 6 of the Resource Management Act (Forms, Fees, and Procedure) Regulations 2003. Copies of Form 6 are available from:

- HAPAI Building, 879- 881 Fergusson Drive, Upper Hutt
- Upper Hutt Library, 844 Fergusson Drive, Upper Hutt
- Pinehaven Branch Library, corner of Pinehaven Road and Jocelyn Crescent, Pinehaven, Upper Hutt
- On the Plan Change webpage at upperhuttcity.com/ipi

Further submissions may be lodged in the following ways:

Online	letskorero.upperhuttcity.com	Email	planning@uhcc.govt.nz
In Person	HAPAI Building 879- 881 Fergusson Drive Upper Hutt	Post	Intensification Planning Instrument Upper Hutt City Council Private Bag 907 Upper Hutt 5140

Intensification Planning Instrument
- Summary of Submissions: Submission 33 The Fuel Companies

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
Submitter 33: Fuel Companies				
S33.1	Entire IPI	Not stated	<p>a) Achieve the following:</p> <ul style="list-style-type: none"> i. The purpose and principles of the RMA consistency with the relevant provisions in Sections 6 - 8; ii. Give effect to the Wellington Regional Policy Statement; iii. Assist the Council to carry out its functions under Section 31 of the RMA; iv. Meet the requirements of the statutory tests in section 32 of the RMA; and v. Avoid, remedy or mitigate any relevant and identified environmental effects. <p>b) Make any alternative or consequential relief as required to give effect to this submission, including, to the degree there is scope, any consequential relief required in any other sections of the Upper Hutt</p>	<p>In addition to the specific outcomes and relief sought general relief is sought in relation to achieving the purpose of the RMA, giving effect to the RPS, meeting sections 31 and 32 of the RMA, and any consequential amendments and relief to address the issues raised in the submission.</p>

			<p>City District Plan (“the District Plan”) and/or the IPI that are not specifically subject of this submission but where consequential changes are required to ensure a consistent approach is taken throughout the documents; and</p> <p>c) Any other relief required to give effect to the issues raised in this submission.</p>	
S33.2	MUZ-R14	Support in part and seek amendment	<p>Seek clarity on whether the PA in MUZ-R14 rule and associated compliance with the standards relates to new service station activities and alterations to existing activities (such as an upgrade to an existing service station in the Mixed Use Zone).</p> <p>Clarify that the limitation on GFA does not include external areas of parking and manoeuvring or, if the intention is to include such areas, that parking and manoeuvring areas</p>	<p>It is unclear whether the permitted activity in rule MUZ-R14 and associated compliance with the standards relates to new service station activities and alterations to existing activities (such as an upgrade to an existing service station in the Mixed Use Zone). Support permitted activity status for existing activities.</p> <p>The activity status for drive through activities in Rule MUZ-R14 is supported, including insofar as it does</p>

			<p>associated with a service station are specifically excluded from that limitation.</p> <p>Clarify that the landscaping standards would not be triggered by additions, alterations, redevelopment, upgrades, new structures associated with and/or changes to an existing service station / drive through activity. Or, if the intention is that those activities comply with these standards, that the requirements in the standards can be reasonably applied to existing service station activities</p>	<p>not differentiate between new or existing drive through activities and so includes additions, alterations, redevelopment, upgrades, new structures and changes to an existing service station / drive through activity. The requirement for permitted activity drive throughs to comply with the two qualifying standards is supported, notwithstanding that changes are also sought to those standards.</p> <p>Retain the permitted activity status of Drive through activities in rule MUZ-R14 subject to meeting two qualifying standards relating to GFA and Rule MUZ-S6.</p>
S33.3	Definitions	Support	<p>Retain the definition of “drive through activity” as notified insofar as it relates to customers generally being vehicle-centric (as opposed to pedestrian centric) and includes service stations</p>	<p>The definition of drive-through activity is supported insofar as it relates to customers generally being vehicle-centric (as opposed to pedestrian- centric) and includes service stations</p>

S33.4	Definitions	Support in part	<p>Retain the definition of “service station” as notified but apply it only to those zones affected by the IPI; or Retain the definition as notified but ensure that the status of a vehicle orientated facility where the principal activity is the refuelling of motorised vehicles and sale of products does not consequentially change throughout the plan.</p>	<p>Amendments to the definition of service station are supported in that it includes refuelling of motorised vehicles. Refuelling of EVs is considered to be included in this definition. The definition is supported, in the context of the IPI only to the extent that it describes the principal activity as being the refuelling of motorised vehicles and the sale of certain products and services. The term ‘and’ implies both components need to be met in order for the activity to be a service station, so unstaffed service stations (e.g. those without a shop) , would not be permitted activities in, for example, the Mixed Use zone. This can be supported in the context of the IPI, but the definition of service station is used throughout the Plan and in zones not affected by the IPI. As an example, service stations that do not meet the new</p>
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				definition (eg: truck stops) would no longer be controlled activities in the Industrial zone. The change proposed have consequential implications on the entire district plan, are not supported and are considered questionable in terms of scope.
S33.5	MUZ-R3	Support	Retain Rule MUZ-R3 as notified.	Demolition of buildings is a permitted activity under Rule MUZ-R3 and this is supported.
S33.6	MUZ-R14	Support and seek amendment	Retain the permitted activity status of Drive through activities in rule MUZ-R14 subject to meeting two qualifying standards relating to GFA and Rule MUZ-S6.	The activity status for drive through activities in Rule MUZ-R14 is supported, including insofar as it does not differentiate between new or existing drive through activities and so includes additions, alterations, redevelopment, upgrades, new structures and changes to an existing service station / drive through activity. The requirement for permitted activity drive throughs to comply with the two

				qualifying standards is supported, notwithstanding that changes are also sought to those standards. Retain the permitted activity status of Drive through activities in rule MUZ-R14 subject to meeting two qualifying standards relating to GFA and Rule MUZ-S6.
S33.7	MUZ-R14(1)(a)	Oppose and seek amendment	Amend Rule MUZ-R14(1)(a) to exclude parking and manoeuvring areas at service stations from the calculation of GFA. One way of achieving this outcome would be to make the following changes: Drive through Activity 1. Activity status: Permitted Where: a. The gross floor area of the activity including parking and manoeuvring areas does not exceed 1,500m ² . <u>For the purposes of this standard, except for service stations, gross floor area shall include parking and manoeuvring areas; and....</u>	Most service stations have a relatively small building footprint and a comparatively larger area of hardstand. The spaces adjacent to fuel dispensers, car care areas have not traditionally been interpreted as 'parking spaces' and external parking and manoeuvring areas have not been interpreted as part of GFA. The IPI is designed to introduce new outcomes into the District Plan and, as such, clarity about interpretation is required. Do not support the PA condition 1a.) under rule MUZ-R14 if it includes the car parking and

				manoeuvring areas of service stations, parking spaces associated with car care and /or other hardstand areas facilitating access to and throughout the site as this would mean that service stations were not permitted activities. Most modern service stations have an area exceeding 1500m2.
S33.8	MUZ-R14(1)(b)	Support	.Retain MUZ-R14(1)(b)	The second qualifying standard (Condition 1b.) for PA status under MUZ-R14 is supported, notwithstanding that changes are sought to MUZ-S6 (Landscaping and Screening), (see separate submission points).
S33.9	MUZ-S6	Oppose and seek amendment	Amend Standard MUZ-S6 as follows (or other wording that will address concerns: 1. provision of an entry point to the site, be adequately screened by a fence or landscaping where they are visible from any: a. Public road; b. Other public space; or c. <u>The ground level of any</u>	Standard MUZ-S6 must be met (via MUZR14(1)(b) to maintain permitted activity status). It is not clear what is meant by “adequately screened”. Screening from adjoining sites is impracticable unless it is only required from ground floor level of those sites as they could be three storey’s

			<p>directly adjoining site zoned Residential or Open Space and Recreation.</p> <p>Amend clause 2, as follows:</p> <p>2. a. Be fully screened, by either <u>a 1.8m high fence fencing or the equivalent in landscaping or a combination of both</u>, from any directly</p> <p>b.to individual parking spaces for residential development, if provided <u>or where the site is utilised by an existing service station activity</u>.</p> <p>Amend clause 3, such that it does not apply in addition to the landscaping required in clause 2.</p> <p>3. At least 5% of any ground level parking area not contained within a building <u>and not directly adjoining the boundaries where screening or landscaping is required by clause (2) above</u>.</p>	<p>or more in height, which would require complete enclosure of certain areas (including carparks). This is not considered to be the intention, nor is it considered necessary. Existing and established service stations have a significant number of traffic movements and visibility to the forecourt and signage is critical to a successful and safe operation. so landscaping needs to be carefully managed. Clause 2(b) has the potential to compromise functional operations at existing service station sites and an exclusion for such activities from clause 2(b) is warranted. For clause 3 clarification is required that landscaping for ground level parking areas not contained within buildings is not in addition to the landscaping required in clause 2, for example, where the ground level parking is along the site boundary directly</p>
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				adjoining a site zoned Residential or Open Space and Recreation, or directly adjoining the front boundary.
S33.7	Entire IPI	Support and seek amendment	Seek amendments to ensure that reverse sensitivity effects on existing lawfully established non-residential activities are minimised	Where consent is required in residential zones, and where residential development is a component of development in the Mixed Use Zone, the Fuel Companies consider that residential amenity and existing activities need to be appropriately protected by provisions which respond to the interface with the Mixed-Use Zone
S33.8	Entire IPI	Seek amendment	Add new policy: <u>New residential development should be designed to minimise reverse sensitivity effects on existing non-residential activities</u>	Overall, the policies are supported, however, IPI has potential to generate reverse sensitivity effects on lawfully established non-residential activities, particularly where they interface with the residential and mixed-use zones, and this is not appropriately recognised throughout the policy framework of the GRZ.

				Further policy direction in this regard should be provided to recognise that reverse sensitivity effects can affect residential amenity and provide direction that such effects should be minimised through design.
S33.9	Rule GRZ-R11	Support and seek amendment	Amend the Matters of Discretion under Rule GRZ-R11 as follows: Council will restrict its discretion to, and may impose conditions on: effects. (7) Effects on neighbourhood character and amenity. (8) Financial contributions. (9) The matters contained in the Medium and High Density Design Guide in Appendix 1. (10) measures to avoid, remedy or mitigate adverse effects. (11) Cumulative effects. <u>(12) Reverse sensitivity effects on existing lawfully established non-residential activities.</u>	Rule GRZ-R11, is supported in principle but residential amenity will be better protected for larger-scale and higher-density residential developments where they have been appropriately designed to manage reverse sensitivity where there is an interface with a Mixed-Use Zone, or with lawfully established non-residential activities. The relief sought is consistent with design principle 1(c): The Site of the National medium density design guide (Ministry for the Environment, May 2022).
S33.10	GRZ-R12A	Support and seek amendment	Amend the Matters of Discretion under Rule GRZ-R12A as follows:	Rule GRZ-R12A is generally supported. However, the matters of discretion do not

			<p>Council will restrict its discretion to, and may impose conditions on:</p> <p>.....</p> <p>(2) Site layout</p> <p>(7) The matters contained in the Code of Practice for Civil Engineering Works.</p> <p>(8) Transport effects.</p> <p>(3) Cumulative effects.</p> <p><u>(6) Reverse sensitivity effects on existing lawfully established non-residential activities.</u></p>	<p>go far enough to enable all relevant effects on residential amenities to be appropriately assessed. Residential amenity will be better protected for larger-scale and higher-density residential developments where they have been appropriately designed to manage reverse sensitivity where there is an interface with a Mixed-Use Zone, or with lawfully established non-residential activities. The relief sought is consistent with design principle 1(c): The Site of the National medium density design guide (Ministry for the Environment, May 2022).</p>
S33.11	GRZ-R12B	Support and seek amendment	<p>Amend the Matters of Discretion under Rule GRZ-R12B as follows:</p> <p>Council will restrict its discretion to.....</p> <p><u>(8) Reverse sensitivity effects on existing lawfully established non-residential activities.</u></p>	<p>New Rule GRZ-R12B is supported insofar as it provides that construction and use of residential units that is not a PA and not covered by Rules R12 or R12A is an RDA. For the same reasons as identified and explained in Submission</p>

				GRZ-12B, an amendment is sought.
S33.12	Policy HRZ-P6	Support and seek amendment	<p>Amend Policy HRZ-P6 as follows:</p> <p>Provide for and encourage medium and high density residential development that is consistent with the Council's Medium and High Density Design Guide in Appendix 1 <u>that achieves a built form that contributes to high-quality built environment outcomes including by:</u></p> <p>(i) <u>Requiring designs to be consistent with Council's Medium and High Density Design Guide in Appendix 1; and</u></p> <p>(ii) <u>Minimising reverse sensitivity effects on existing lawfully established non-residential activities</u></p>	<p>The IPI has potential to generate reverse sensitivity effects on lawfully established non-residential activities, particularly those operating at the interface with residential and mixed-use zones. This is not appropriately recognised throughout the policy framework of the HDRZ. Further policy direction in this regard be provided. Policy HRZ-P6 is therefore sought to be amended to address this. Would support an amendment to another policy with similar effect or a new policy which appropriately addresses the management of effects of reverse sensitivity.</p>
S33.13	HRZ-S1	Support	Retain Standard HRZ-S1 as notified.	Standard HRZ-S1 states that the standards and matters of discretion contained in the GRZ chapter are

				applicable to permitted activities in the HRZ unless specifically provided for in the HRZ table below. This approach is supported.
S33.14	HRZ-S2	Support and seek amendment	Amend Standard HRZ-S2 as follows: Matters of discretion are restricted to: <u>(8) Reverse sensitivity effects on existing lawfully established non-residential activities.</u>	Residential amenity will be better protected for larger-scale and higher-density residential developments, and where a development does not meet the PA height limit, where they have been appropriately designed to manage reverse sensitivity where there is an interface with a Centre or Mixed-Use Zone, or with lawfully established non residential activities. The relief sought is consistent with design principle 1(c): The Site of the National medium density design guide (Ministry for the Environment, May 2022).
S33.15	HRZ-S3	Support and seek amendment	Amend Standard HRZ-S3 to include the following matter of discretion: <u>(7) Reverse sensitivity effects on existing lawfully</u>	For the same reasons as identified for proposed amendments sought to HRZ-S2 seek an amendment by way of addition to the matters of discretion is required.

			<u>established non-residential activities.</u>	
S33.16	HRZ-S4	Support and seek amendment	Amend Standard HRZ-S4 to include the following matter of discretion: <u>(7) Reverse sensitivity effects on existing lawfully established non-residential activities.</u>	For the same reasons as identified for proposed amendments sought to HRZ-S3 seek an amendment by way of addition to the matters of discretion is required.
S33.17	HRZ-S5	Support and seek amendment	Amend Standard HRZ-S5 to include the following matter of discretion: <u>(7) Reverse sensitivity effects on existing lawfully established non-residential activities.</u>	For the same reasons as identified for proposed amendments sought to HRZ-S3 seek an amendment by way of addition to the matters of discretion is required.
S33.18	HRZ-R8	Support and seek amendment	Amend Standard HRZ-S8 to include the following matter of discretion: <u>(8) Reverse sensitivity effects on existing lawfully established non-residential activities.</u>	For the same reasons as identified for proposed amendments sought to HRZ-S3 seek an amendment by way of addition to the matters of discretion is required.
S33.19	MUZ-O1	Support	Retain MUZ-O1 as notified.	Support new Objective MUZ-O1 because it caters for a range of activities within the zone
S33.20	MUZ-O2	Support and seek amendment	Amend MUZ-O2 as follows: Mixed Use Zones are	Support new Objective MUZ-O2 in part. The

			vibrant, attractive and safe urban environments. The built environment is well-designed, reflects the wide mix of <u>compatible residential and non-residential</u> activities and is generally of a medium to high scale and density	associated objective doesn't appear to cover all aspects that the heading indicates that the objective relates to, at least in a way that makes it clear what the intent of the objective is, or address amenity values of the Mixed Use Zone to ensure that the mix of activities are compatible.
S33.21	MUZ-O3	Support and seek amendment	Amend MUZ-O3 heading, and text as follows: <u>Managing Effects on Residential Amenity</u> and at the Zone Interface Use and development within the Mixed Use Zone are of an appropriate scale and manages potential adverse effects on: a) the amenity values of adjoining sites in Residential or Open Space and Recreation Zones. <u>b) the amenity values of residential activities within the same Zone.</u> c) <u>reverse sensitivity,</u>	Support new Objective MUZ-O3 in part. It is important to manage effects between activities in the mixed use zone and activities on adjoining zones, in particular zones which enable more sensitive activities, including residential activities. It is just as important to manage the effects of activities within the zone to enable a mix of activities including more sensitive activities such as residential.
S33.22	MUZ-P2	Support	Retain Policy MUZ-P2 as notified.	Support as the policy seeks to minimise reverse sensitivity effects on non-residential activities

S33.23	MUZ-R16	Support	Retain Rule MUZ-R16 as notified.	This rule is supported in that it appropriately protects new residential activities from potential effects from existing non-residential activities on adjoining sites
S33.24	MUZ-S4	Support	Retain Rule MUZ-S4 and associated matters of discretion as notified.	Support this standard and the associated Matters of Discretion because they both seek to manage effects of reverse sensitivity
S33.25	Design Guides	Support and seek amendment	Amend the Medium and High Density Design Guide so that it includes the following as an early-stage design criteria for medium and high density housing: <u>Identifying current or proposed non-residential activities nearby may also influence how the development responds; for example, minimising noise impacts of commercial activities and sites near main roads and railways.</u>	The Medium and High Density Design Guide is supported in part. It does not, however, mention a key good design principle of responding to the existing environment in terms of managing reverse sensitivity effects. Therefore consider that the Medium and High Density Design Guide should be amended to include Point 1(c) on Page 6 of the National Medium Density Design Guide (Ministry for the Environment, May 2022)2.
S33.26	Rule TP-R3	Support	Retain Rule TP-R3 as notified.	Proposed new Rule TP-R3 permits activities, buildings and structures if site access if compliant with Standard

				TP-S1. This new rule is supported in principle.
S33.27	Standard TP-S1	Support and seek amendment	<p>Amend Standard TP-S1 as follows: Where site access is required or provided the following standards apply:</p> <p>(1) All accessways and manoeuvring areas shall be formed and surfaced in accordance with the Code of Practice for Civil Engineering Works (<u>Sections X and Y</u>).</p> <p>Exemption – the requirement for accessways serving sites solely occupied by unstaffed utilities shall be that the accessway shall be surfaced with permanent all weather surfacing for a minimum length of 5m from the edge of the road carriageway seal.</p> <p>(2) Sites shall have practical vehicle access to car parking and loading spaces (where provided or required), in accordance with the Code of Practice for Civil Engineering Works (<u>Sections X and Y</u>).</p> <p>This requirement does not apply to sites solely occupied by unstaffed</p>	<p>Proposed new Standard TP-S1 requires site access (if required or provided) to comply with six standards. The CoP is comprehensive but should be made clearer as to which sections (by reference or heading) of the CoP need to be met.</p> <p>2. As above</p> <p>3. The requirement that vehicle access to a corner allotment be not closer than 8m from the street corner is not opposed, however, seek clarification as to when the standard is triggered by an activity. For example, it is unclear whether it relates to changes to existing operations, maintenance and upgrades of existing service stations. It is not appropriate to require resource consent for access purposes for changes to existing lawfully established operations, in particular where operations, maintenance and upgrades</p>

			<p>utilities, provided that vehicles associated with utilities shall not obstruct the footpath or create a traffic hazard on the road. (3) Vehicular access to a corner allotment shall be located no closer than 8m from the street corner. Where a site is located on an intersection of a primary or secondary arterial traffic route (as identified in the Transport and Parking (TP) Chapter) the siting of the vehicular access shall be located as far as practicable from the corner of the street. The 8 metre setback shall be measured from where the two front boundaries of the site (refer to the definition of a corner allotment) join, or in accordance with the diagram below. <u>Note: This standard only relates to new allotments, new activities, or, where associated with an existing lawfully established activities, where the activity will result in a</u></p>	<p>will not materially change vehicle movements to / from an existing lawful activity and no changes to existing vehicle crossings are proposed. Sub-standard 3 need only apply to new activities and therefore relief is sought. 4. Support standard where a corner allotment is located at an intersection of a national, primary or secondary arterial traffic route. It is important to protect signage so that road users have clear visibility. The standard, however, could potentially come into conflict with proposed Standard MUZ-S6 in the Mixed Use Zone (and potentially other landscaping standards in other Zones that require trees to be planted) because it requires road frontages to be planted with a mixture of vegetation including trees.</p>
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			<u>material change to the number or change to the nature of vehicle trips to and from the site.....</u>	
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