

FURTHER SUBMISSION IN SUPPORT OF, OR IN OPPOSITION TO, A SUBMISSION ON THE PROPOSED TE TAI O POUTINI PLAN

Clause 8 of Schedule 1 Resource Management Act 1991

To: Te Tai o Poutini Plan Team
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Further Submitter Details

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We are:

a) representing a relevant aspect of the public interest. Buller Conservation Group was incorporated in the early 1990s in response to what it considered to be wanton destruction of indigenous values in the Buller District and elsewhere on the West Coast, and was concerned at the lack of oversight via monitoring and compliance by local authorities. We set out to alert local authorities and the wider public to issues of concern. We still maintain that outlook and want to ensure that the plan that directs the future of our region will safeguard the intrinsic nature, the aesthetic beauty, and the life-supporting ecosystem services of our natural environment.

b) We also have an interest in the proposal that is greater than the interest of the general public because we made an original submission on the proposed TTPP and would like to follow through the process to ensure that the valid comments and suggestions we have made will not be swamped by those who envision a future allowing exploitation of the natural environment unfettered by environmental constraint.

TTPP Hearing

We wish to be heard in support of our original and further submission? **Yes**

If others make a similar submission would you consider presenting a joint case with them at a hearing?

Yes

In particular Buller Conservation Group and Frida Inta will be represented by Frida Inta.

Submission

The submission points, support or opposition, reasons and decisions sought, are set out in the attached document.



Frida Inta, on behalf of Buller Conservation Group

16th June 2023

Name of Further Submitter Buller Conservation Group

Our specific further submission(s) are as follows:

Plan section	Provision	Submitter	Submission point	Support/ Oppose	Reasons
Whole Plan	Whole plan	S581 (David Ellerm)	S581.002	partially support	We do support the plan in essence but the amendments we recommend in our original submission we would like to see incorporated.

Following are further details of what we support or oppose in submissions.

Plan section	Provision	Submitter	Submission point	Support/ Oppose	Reasons
Whole Plan	Whole Plan	S560 (Royal Forest and Bird Protection Society of New Zealand Inc.)	S560.001	Support	We would like to see some simplification occur
Whole Plan	Whole Plan	S560	S560.011	support	We support better protection of indigenous biodiversity
Buller Coalfield Zone	Buller Coalfield Zone	S560	S560.015	support	The approach to mineral extraction and ancillary activities in the Plan is too permissive
Mineral Extraction Zone	Mineral Extraction Zone	S560	S560.016	support	The approach to mineral extraction and ancillary activities in the Plan is too permissive
Whole Plan	Whole Plan	S560	S560.019	support	Mining activities should not be permitted activities
Whole Plan	Whole Plan	S560	S560.027	support	ECO rules must apply to all sections of the plan
Whole Plan	Whole Plan	S560	S560.030	support	Non-biodiversity offsetting is worriesome.

Plan section	Provision	Submitter	Submission point	Support/ Oppose	Reasons
Whole Plan	Whole Plan	S547 (Westpower Ltd)	S547.001	oppose	When it comes to critical infrastructure Westpower is trying to include activities that are not critical
SIGN	Sign - P2	S547	S547.492	oppose	We are not sure the RMA's adverse effects hierarchy can be applied to the effects signs have on landscapes.
PART 2 - DISTRICT WIDE MATTERS	PART 2 - DISTRICT WIDE MATTERS	S536 (Straterra)	S536.005	oppose	SNAs need protection, not exploitation
Whole Plan	Whole Plan	S536	S536.026	oppose	The plan should not be openly enabling to mining
Subdivision	SUB - R9/ECO - R6	S510 (Avery Bros)	S510.051	oppose	Biodiversity offsetting or compensation would defeat the purpose of SNAs
Coastal Environment	Coastal Environment	S510	S510.062	oppose	Just because a private property is in the coastal environment should not mean it can be exempt from protection of natural biodiversity and its processes.
STRATEGIC DIRECTION	Strategic Directions Overview	S190 (Te Mana Ora (Community and Public Health))	S190.004	support	The health, wellbeing and resilience of communities needs more emphasis in the plan. A healthy natural environment supports and enhances the health and wellbeing of communities and a naturally prosperous community will enhance the natural environment
Whole Plan	Whole Plan	S493 (TiGa Minerals and Metals Ltd)	S493.001	oppose	In general we oppose TiGa's liberal outlook to enabling mining and other exploitative industries
Natural character	NC - P2	S493	S493.065	oppose	Should not be doing such activities near waterbodies

Plan section	Provision	Submitter	Submission point	Support/ Oppose	Reasons
Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity Objectives	S601 (Birchfield Coal Mines Ltd)	S601.032	oppose	It is unacceptable that Birchfield Coal Mines would consider using Conservation land as offset for mining activities in the private sector unless real and bountiful benefits can be achieved. It does not need this plan to address such issues, which are rather the domain of RC conditions and consultation with Department of Conservation.
Ecosystems and Indigenous Biodiversity	ECO - P6	S601	S601.037	oppose	Manuka and kanuka are important sere species in canopy evolution, but are also actual canopy species in some wetland and other related ecosystem types
Natural Character and Margins of Waterbodies	NC - R3	S601	S601.053	oppose	Riparian margins need strong protection; mining activities must be excluded from these areas
Hazardous substances	HS - O1	S613 (Fuel companies)	S613.002	oppose	S613 suggestion would warp the intent of the objective. Major hazard facilities possibly could be a further objective or policy
NFL	NFL-P new	S438 (Manawa Energy Limited)	S438.086	support	Although possibly identifying ONFLs is already a done deal, the identification should not now be closed, with this new P1 a worthy suggestion
Natural character	NC whole chapter	S415 (G.E. C.J. Coates on behalf of Nikau Deer Farm Ltd)	S415.006	oppose	We find that attitude to our waterways repugnant and hopefully this comment of S415 will be ignored.

Plan section	Provision	Submitter	Submission point	Support/ Oppose	Reasons
Zones	Zones - whole chapter	S415	S415.010	partial support	Possible support. We would like to see where this suggestion leads
Natural character	NC - R1	S519 (New Zealand Defence Force)	S519.030	oppose	This would have the capacity to destroy the riparian margin for only temporary gain
TEMP	Temp_ R1	S519	S519.017	oppose	Destroys intent of the rule. '31 consecutive days' - If NZDA wants further permission it needs to apply for a resource consent.
LIGHT	Light - R2	S538 (Buller District Council)	S538.325	oppose	BDC needs to be more sensitive in the way it distributes its streetlighting

Reasoning in detail: In general we support the intent of the TTPP (hence supporting submitter S581, David Ellerm) as we see it as trying to strike a balance between protection and exploitation of the natural resources of the West Coast, but we believe there are multiple cases, not least the extant global biodiversity crisis, for stronger protection of remaining, and rehabilitating, indigenous biodiversity in the West Coast Region.

In principle we support the submission of S560, Royal Forest and Bird Protection Society of New Zealand Inc. We have noted some particular points of Forest and Bird's that we support.

We also support submitter S602, Department of Conservation, in principle, although we have not included any particular points of the Department's in our further submission.

In general we support submitter S190, Te Mana Ora (Community and Public Health) as we feel the health and wellbeing of communities is closely allied with that of the natural environment, and there is a need for more protection and enhancement of that wellbeing in the TTPP. We have picked a particular point of S190's that we agree with.

We do not agree with submitter S547, Westpower, as we feel that power company is pushing its agenda to covet what should be only **vital** infrastructure's spatial liberties, for instance the energy activities Westpower advocates may not of necessity need special spatial liberties.

We do not agree with submitters S536 Straterra, S510 Avery Bros, S493 TiGa Minerals and Metals, S601 Birchfield Coal Mines Ltd, and affiliated submitters that support greater enabling of mining and other exploitative industry. We are in a biodiversity crisis, both globally and nationally, and these submitters need to acknowledge that fact and realize that we need to have more and better protection of the balance of nature against our exploitative industries.

A number of submitters suggest at their various points concerning the adverse effects hierarchy, that 'minimize' should be substituted with 'manage'. If there was a definition of 'manage' to say it incorporated the adverse effects hierarchy (and used exclusively in this way) this would be acceptable as it would be an abbreviation of that cumbersome term. However we dont think a specifically exclusive use of the word, 'manage', would be an acceptable use of the word.

Frida Inta,
for,

A handwritten signature in blue ink, appearing to read 'Frida Inta', is placed over a light blue rectangular background.

Buller Conservation Group

21st June 2023