

S29

Te Tai o Poutini Plan Proposed Plan

Submission form



Te Tai o Poutini Plan Proposed Plan

We need your feedback. We want to hear from you on the proposed Te Tai o Poutini Plan. What do you support and what would you like changed? And why? It is just as important to understand what you like in the Proposed Plan as what you don't. Understanding everyone's perspectives is essential for developing a balanced plan.

Your details:

First name: John Surname: Caygill
Are you submitting as an individual, or on behalf of an organisation? Individual Organisation
Organisation (if applicable): _____

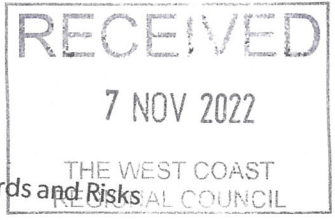
Would you gain an advantage in trade competition through this submission? Yes No
If you **could** gain an advantage in trade competition through this submission please complete the following:

I am /am not directly affected by an effect of the subject matter of the submission that (a) adversely affects the environment; and (b) does not relate to trade competition or the effects of trade competition.

Postal address: John Caygill, 17 Palmerston Street, Greymouth 7805.

Email: muircaygill@xtra.co.nz Phone: 03 7684704
Signature: J. C. Date: 7/11/2022

Your submission:



The specific provisions of the proposal that my submission relates to are:

- Strategic Direction
- Historical and Cultural Values
- General District Wide Matters
- Appendices
- Energy Infrastructure and Transport
- Natural Environment Values
- Zones
- General feedback
- Hazards and Risks
- Subdivision
- Schedules

All submitters have the opportunity to present their feedback to Commissioners during the hearings process. Hearings are anticipated to be held in the middle of 2023. Please indicate your preferred option below:

- I wish to speak to my submission
- I do not wish to speak to my submission
- If others make a similar submission, would you consider presenting a joint case with them at a hearing?
 - Yes, I would consider presenting a joint case
 - No, I would not consider presenting a joint case

Public Information - all information contained in a submission under the Resource Management Act 1991, including names and addresses for service, becomes public information. The content provided in your submission form will be published to the Te Tai o Poutini Plan website and available to the public. It is your responsibility to ensure that your submission does not include any personal information that you do not want published.

Want to know more?
www.tppp.nz
0508 800 118



Te Tai o Poutini PLAN

A combined district plan for the West Coast

4. 17

Submission to the proposed TeTai o Poutini Plan ['the Plan']. John Caygill.

Issues:

1. Lack of alignment with national and regional policy direction.

(a). The definition of the Coastal Environment needs to be consistent with the New Zealand Coastal Policy Statement (NZCPS) Policy 1 and the West Coast Regional Policy Statement (RPS), and Coastal Environment as so defined needs to be clearly identified on planning maps.

Relief sought:

- amend the definition of the Coastal Environment throughout the Plan to be consistent with the NZCPS1 and the RPS, and
- comprehensively map the full extent of the Coastal Environment across the West Coast.

(b). Significant Natural Areas (SNAs).

(i) SNAs should be identified according to the RPS Appendix 1 significance criteria, and mapped across the entire West Coast region, and listed in the Plan.

(ii) The term 'SNA', as defined in the RPS, should replace the term 'Areas of Significant Indigenous Biodiversity' in relation to subdivision in the Plan, and should be used when referring to as-yet unspecified areas of significant biodiversity as per RPS criteria.

(iii) The protection requirements for significant indigenous vegetation and significant habitats of indigenous fauna, as mandated by the RMA (section 6), and set-out in the RPS, should be included in the Plan.

Relief sought:

- as stated in (b) (i), (ii), and (iii) above.

2. Public Conservation Land not identified and not zoned consistently.

Public Conservation Land is not clearly distinguishable from other land on the planning maps, nor is it consistently zoned with regard to conservation purposes: i.e. the protection of natural and cultural resources.

Relief sought:

- Clearly identify public conservation land on planning maps
- Remove the Buller Coalfield Zone and Mineral Extraction Zone designations from Public Conservation Land
- Re-zone public conservation land to Natural Open Space Zone.

3. Mineral Extraction Zones and the Buller Coalfield Zone are not justifiable and should be removed.

(a). Mineral Extraction Zones

- (2)
- (i) It is not necessary to create a special purpose zone for lawfully established mining activities.
 - (ii) A zoning approach would override due consideration being given to other natural character, landscape and biodiversity values that are required to be protected by the RPS and the RMA.
 - (iii) Furthermore, the proposed rules for the proposed zones are too permissive: they are inconsistent with protection requirements as set-out in the RPS and the RMA; they do not address adverse effects appropriately and they are inconsistent with regulatory practice for activities with more than minor adverse effect, and thus conducive to further biodiversity loss. Management of the adverse effects of mining activities should be consistent with the surrounding zone to ensure appropriate remediation.

Relief sought:

- Delete Mineral Extraction Zones from the Plan, and re-zone these areas as appropriate (e.g. Natural Open Space if currently public conservation land, General Rural Zone or as consistent with adjacent zoning)
- Ensure there is a requirement for an ecological assessment in accordance with the RPS significance criteria for all new mineral extraction activities.

(b). Buller Coalfield Zone

Coal mining is already a lawfully established activity in parts of this proposed zone. However, because of the special - often unique - character of much of this zone there should be no new permissions granted for extensions to current coal mining operations or for new coal mining operations to be set-up. The special nature of the Denniston–Stockton plateau applies to its flora, its fauna, and its visible landforms. “The vegetation of the plateau appears sparse and scrubby, but this is a consequence of the harsh climate and poor soils: there is a high diversity of plant species, and some of the bonsai-like small shrubs are hundreds of years old. The plateau includes alpine plants found at unusually low altitudes and several localised or endemic plants. ... The plateau has great spotted kiwi (*Apteryx haastii*), fernbirds (*Poodytes punctatus*) and New Zealand pipits (*Anthus novaeseelandiae*), as well as weka, kea, and riflemen. Reptiles include speckled skink, coastal green gecko, and forest gecko (which here inhabits scrubland). Several species of large carnivorous Powelliphanta snail are found on the plateau, and some are endemic to it and threatened by mining.” (Wikipedia: ‘Denniston – Stockton Plateau’).

Recently the South Island Stewardship Land Review Panel described this area as ‘an outstanding natural landscape containing high conservation, historic, recreation and landscape values’. If the undisturbed areas were subjected to open-cast coal mining, it would be physically impossible for the landscape and biota to be restored to anything approaching its original character.

While not disputing the facts that the world still needs coking coal for steel production, and that new or extended coal mining in this region would provide a number of well-paid jobs for a number of years, this does not justify the destruction of this fragile and rare – in many ways unique - ecosystem, particularly given that coal (even good coking coal) is not a scarce resource world-wide, and the anticipated economic benefits of new mining operations would be short-lived, while the habitat destruction would last for millennia.

Relief sought:

- Delete the Buller Coalfield Zone from the Plan.

 John Caygill.

7/11/22