

Online submission

This is a submission that was made online via the Council's website.

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Submitter is contact	Yes
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Wish to be heard	Yes
Joint presentation	Yes
Trade competition	I could not gain an advantage in trade competition through this submission.
Directly affected	N/A
Withhold contact details?	No

Submission points

Plan section	Provision	Support/oppose	Reasons	Decision sought
[General]	[General]	Amend		Please find submission and reasons in support document
ZONES	ZONES	Amend	Barrytown has outgrown itself and requires surrounding area for expansion. Barrytown is an increasing popular small coastal rural settlement but suffers from being overlooked by council and planners. We have one congested main road (cargills) with inadequate parking for the school and community hall. The intersection to the highway is increasingly dangerous, road drains are unfinished. Conflict from lack of planning in development exists between farm and settlement. TTpp is the opportunity to address these issues, but it appears to be overlooked again.	Expand the Barrytown township settlement area

Documents included with submission

Document name	General Submission
File	generalsubri.docx
Description	General Submission

I am writing this general submission as a 6th generation west coaster, who has spent most of my life on the Westcoast. Because of our family's long running connection to this region, I have a solid understanding of human occupation and its impacts. The ttp as an idea, is an excellent tool for planning and management and I am supportive of the process.

I have seen first-hand and lived with the detrimental effects of a great lack of good planning and regulation on the Westcoast.

My primary concern is the lack of recent population data, important when planning for future growth. I haven't seen any reliable population data since 2013. I hope the 2023 census will be a success and its data applied to the ttp. Planners must wait for this data to come in before finalizing zoning on the coast. My observation of the area of the coast road where I live is one of large growth. This is showing in building consents issued, the high number of jobs available, the demands on housing and higher rental prices. On the info metrics website <https://ecoprofile.infometrics.co.nz/West%20Coast%20Region/PDFProfile>

Pg 39 states that "The population numbers presented in this profile are based on Statistics New Zealand's **Estimated** Resident Population (ERP). The ERP is an **estimate** of all people who usually live in an area at a given date. Visitors from elsewhere in New Zealand or from overseas are excluded. The ERP is not directly comparable with the census usually resident population count because of a number of adjustments. **The ERP at 30 June 2018 is based on the 2018 census usually resident population count**, adjusted for: net census undercount (based on the 2018 Post-enumeration Survey), residents temporarily overseas on census night, births, deaths, and net migration between census night and the date of the estimate, reconciliation with demographic estimates at ages 0–9 years. the current population

As the 2018 NZ census is considered a failure <https://www.stats.govt.nz/methods/2018-census-collection-response-rates-unacceptably-low>

<https://www.stuff.co.nz/national/114984568/census-2018-review-shows-you-could-almost-count-on-census-failure> it seems all current population data for the west coast region is an estimate based on a failed census, and the only accurate data is from the 2013 census, which is almost 10 years out of date.

I have never seen the coast as revitalised as it is today. As a child (in the 80s and 90s) towns like Runanga and Taylorville had a majority of run-down houses, over grown sections and abandoned property. For sale signs would sit for 10 years or more. But over the last five years the majority of houses are now well presented, there are new homes being built, very few for sale signs, and derelict homes being removed or repaired. Young families, self-employed and retirees are moving out and settling into rural areas successfully and enjoying a great quality of life. With the internet bringing new possibilities for employment, my neighbours are now from all parts of nz and the world, enjoying the high quality of lifestyle, earning good money, bringing their wealth to the area. An example of modern innovation bringing wealth to the coast, <https://thespinoff.co.nz/business/21-04-2021/how-westports-innovation-hub-is-balancing-the-old-world-with-the-new>,

My secondary concern is that the ttp is too permissive of all large-scale industry. In the ttp mining is a permitted activity in the General rural zone "Permitted activities do not require resource consent, provided standards and all other relevant rules are met". This is unacceptable. Please create greater provisions and definitions in the ttp for regulation of large-scale industry. Consider every large-scale proposal on a case-by-case basis. The plan must have a clear definition of what large scale industry is. Whether it's a huge hotel being built in a delicate area at sea level (like Punakaiki), a 500+ herd dairy farm, or open cast mine.

Large scale industry has had significant negative effects on environment and community (examples follow). Prosecution and remediation do not resolve the harm caused by lack of planning and regulation.

Permitted large scale industry is causing harm to the environment and people, which cannot be mitigated or remedied. Costs of these failures is often much higher than any profits from these operations as the following examples show. Regulation should require significantly large financial bonds, so operators and developers consider and research thoroughly before beginning. Anything that prevents these developments from causing irreparable harm to areas where they operate and passing cost to remedy onto the community.

Therefore, greater regulation and definition of industry is necessary, and the ttp must deliver on this. Helen Clark has just spoken on this matter at a mining forum in Australia <https://www.rnz.co.nz/news/world/477939/helen-clark-mining-boom-could-harm-environment-communities>

I use the Barrytown flats as an example of land development for industry done poorly with a great lack of planning.

Since the Barrytown flats has been cleared almost entirely of old growth forest (which was just buried or burned), for increasingly intensive agriculture (beef and sheep farms converted to dairy) and mineral extraction, the negative effects on the environment and community have been severe and ongoing. Regulation from the councils has been poorly enforced and monitoring of inputs and runoff to waterways and ocean has been extremely minimal. (No water quality sampling along the entire Barrytown flats by the regional council) Creeks have been cut off from flowing to the sea, and are considered drains instead (Granite ck becomes Clarks drain). Flooding and landslides have been exacerbated from poorly thought-out human disturbance (gold sluice mining on hillsides, interference with waterways). The farm land is considered marginal land and has been declining in fertility since it was cleared. Erosion of fertility and the land due to clearance from poor industry practices is accelerating, the sea is coming onto the land more than 50m in places, hectares of land are being lost each year along the coastline. Erosion is definitely worse where all vegetation has been removed, and the land flipped over from dredge mining (this is not rehabilitation but destabilization.) Intensification of dairying (from 80 head herds to 500+ head herds) is causing poor outcomes for the community I live in, which has had a large-scale industrial dairy farm developed around. This is causing conflict within the township. I have seen the Barrytown school kids playing at lunch time while being sprayed with

herbicides and pesticides from fixed wing aircraft, the cemetery has been trampled by a herd of cows, and dead animals piled up on trailers just across the road (photo provided). Council land 5m from the school gate being used as a standoff pad for the whole dairy herd, with thick muck and strong odour lasting weeks. A whole herd of cows (500+) has been though residential properties multiple times in the township, causing damage. Beach access for the community is prevented via paper roads which have farm fencing and drains crossing them.

In delicate and environmentally important areas like the Barrytown flats, where minerals are present, large-scale mining cannot be a permitted activity. If mining was done poorly here the negative outcomes will be wide ranging. The Paparoa national park and Punakiaki area is one of the most visit in all of New Zealand, its coast road is in the top 10 scenic highways in the world.

<https://www.stuff.co.nz/business/99997549/the-tourist-mecca-of-punakaiki-is-bursting-at-the-seams>

<https://www.stuff.co.nz/the-press/news/west-coast/127759462/west-coast-mineral-sand-mine-rejected-partly-over-fears-for-westland-petrel-colony#:~:text=Residents%20of%20a%20West%20Coast,on%20a%20spectacular%20scenic%20drive.>

A mining failure here will be seen on the world stage. People will encounter it from the highway, beach and hills above (the Paparoa track and Tiako breeding grounds).

Mining is a high-risk high reward industry, by its own admission. Mining leaves long term damage for short term or no gain. Minerals are deposited over time and remain present till extracted. Mineral value increases over time like all precious finite resources. Extraction should only begin when the mining can deliver a good outcome for the environment, company and country as a whole.

The mining industry has impoverished West coast communities more than it has revitalized them, with their social and financial shocks (boom and bust). Who benefits the most if minerals are mined now and how long does that benefit remain in the community (if any)? Ask the people of Waiuta, Roa and Rewenui about the long-term value of mining, if you can find any. Where did the real benefit go from all of the coal and gold that was mined off the coast. How much now remains, a lot of the coal is still burning in the ground (behind Runanga, Reefton and largest of all Millerton) from poor extraction processes. Does Greymouth look like a town that has done well for its self from all the past extractive industries?

Local opposition to the promises of large-scale industry is understandable when considering past failures of permitted mining activity. They can be overhyped, poorly planned and have consistently underdelivered. Following is some of the many examples and evidence, past and present, of the failures and permanent negative effects of large-scale mining on the Westcoast.

Ross township water supply

Recent large-scale goldmining in Ross, by an American company has permanently degraded the townships water supply.

Please use these links for details

<https://www.stuff.co.nz/environment/101519206/mining-company-charged-with-contaminating-west-coast-water-supply>

<https://www.odt.co.nz/regions/west-coast/ross-residents-rejecting-tap-water>

<https://www.stuff.co.nz/environment/108243863/mining-company-avoids-court-with-sixfigure-slip-settlement>

A gold mining company has been charged following the pollution of the Ross town water supply.

Ross residents were on water restrictions for at least two months after a slip polluted the town supply in August last year. American-owned Elect Mining Ltd allegedly carried out illegal earthworks at its Butlers alluvial goldmine near Ross which caused the slip into the Minehan Creek catchment – one of two that feed the town. West Coast Regional Council chief executive Mike Meehan said the company had been charged with illegally discharging into the waterway. "Charges have been laid relating to breaching our rules around discharging into waterways. We have taken action under the RMA and from what we understand the Westland District Council will be seeking compensation for the damage caused."

Westland District mayor Bruce Smith said a new filter would cost up to \$350,000 and the council would be pursuing the mining company for costs if it was found to be responsible by the court.

"It caused a lot of damage and a real frustration to the people of Ross. It clogged up the filter with clay and that type of filter is no longer manufactured in New Zealand so we had to look at a replacement." Ross residents rejecting tap water

Biddy Manera said a lot of people were getting their own water in due to the taste and smell of the chlorine being used by the Westland District Council to flush the system.

"Some days you can be in the shower using a perfumed soap and you can still smell the chlorine," Ms Manera said. "It doesn't happen all the time but it happens frequently enough to be off-putting."

Tap water also left an "unpleasant" aftertaste.

A mining company has paid \$105,000 after causing a slip that contaminated a public water supply on the West Coast. American-owned Elect Mining Ltd caused a slip in the Minehan Creek catchment in August 2017, while the company was building a road at its Butlers alluvial goldmine near Ross, south of Hokitika. It covered the bed of the creek – one of two that feeds the Westland town's water supply.

However, the charges were withdrawn after an out-of-court settlement.

The \$105,000 payment includes \$15,000 to the Ross community for use in a community project, \$70,000 to the district council for costs to the water supply system, \$14,767 to the regional council for investigation costs, and \$5232 to cover Department of Conservation (DOC) costs.

Pike River

Pike river coal mine was a permitted activity and heralded by council and government, but ended with negative financial gain for the entire country (\$51 million spent on recovery) and the deaths of 29 hard working men, one a neighbour of mine who never returned to his young family. The failure of Pike River also effected many small business (the servicing industries) on the coast who were left with unpaid bills.

Please use these links for details <https://pikeriver.co.nz/information>

<https://www.beehive.govt.nz/release/pike-river-coal-mine-officially-opened-today>

<https://www.odt.co.nz/news/politics/mining-changes-likely-after-pike-river-tragedy-key>

<https://www.odt.co.nz/news/politics/pike-river-coal-mine-good-mining-brownlee>

"In practice, almost every phase of construction was dogged by delays and cost overruns. Most of the problems resulted from the failure of the company to undertake adequate geological and geotechnical investigations before starting work."

Many catastrophic mining accidents are preceded by situations in which warning signs are normalised, dismissed as intermittent or simply ignored. At Pike, however, a lot of safety information was not assessed at all. It simply remained unnoticed in the safety management system.

At one stage the Inspector of Mines, employed by the Labour Department, considered closing down the mine until the methane and ventilation problems were sorted out, but the mine management convinced him that they had these issues under control.

"The project will recover an estimated 18 million tonnes of coal over its 18-year life. That will make a significant contribution to our exports and our economy, particularly on the West Coast."

"Around 150 people are expected to be employed by Pike River when the mine reaches full production in July 2009. The mine will also provide employment for another 450 people in support and servicing industries."

Charming creek Ngakawau

An example of irreversible environmental damage caused by mining. This creek area is stunningly beautiful but the creek is now a stinking mess.

"Impact of Mining on the Lower Ngakawau River Since 1950 Stockton Open Cast Mine has excavated over 60 million tonnes of Brunner Coal Measures overburden sandstones and mudstones. The current operator, Solid Energy New Zealand, recognises that acidic drainage from this overburden and from historic underground mines has led to depressed pH levels and elevated levels of metals in streams draining the Stockton Plateau."

Please use this link for details

<https://www.ausimm.com/publications/conference-proceedings/2003-ausimm-new-zealand-branch-annual-conference/impact-of-mining-on-the-lower-ngakawau-river/#:~:text=Impact%20of%20Mining%20on%20the%20Lower%20Ngakawau%20River,of%20metals%20in%20streams%20draining%20the%20Stockton%20Plateau.>

https://www.waternz.org.nz/Attachment?Action=Download&Attachment_id=977

Waiuta clean up

A case of the taxpayers subsidising the private mining companies, and companies who go broke trying to make money for a few.

<https://www.nzherald.co.nz/nz/departments-of-conservation-to-clean-up-contaminated-alexander-river-after-waiuta-on-the-west-coast/BUFPM75IOZSQPFEW73S3IYNAAAY/>

Department of Conservation to clean up contaminated Alexander River, after Waiuta on the West Coast

Fresh from the \$2.6 million clean-up of the most contaminated mine site in New Zealand, at Waiuta, the Department of Conservation has applied for consents to also tackle the nearby Alexander River site. The remote hard-rock goldmine operated between 1924 and 1943 and included a similar ore roasting plant to the Prohibition Mine at Waiuta, near Greymouth. DoC says there is significant arsenic, mercury and cyanide contamination of the soil.

The Alexander River site, about 10km from Waiuta, is on flood plain, and if the river changes course, toxic material could potentially be washed downstream. The Waiuta clean-up took from August to November, resulting in the removal of 96 barrels of arsenic-contaminated material.

Lesser contaminated materials were placed in a low-lying area on the site and then lined with mullock, the waste rock from the mine excavations. The \$2.6m Waiuta remediation was jointly funded by DoC and the Ministry for the Environment's contaminated sites remediation fund, which will also pay for the work at Alexander River.

Westcoast communities are running out of patience for rushed permitted mining proposals and poorly considered development and the devastating disasters they deliver.

Thirdly, I submit that the plan being developed needs to provide for the inclusion of the value of carbon sinks. Please consider protection for all old growth forest on the Westcoast. I submit to have this carbon valued and counted and income earned, it's a renewable earner over a much longer time frame than mining or dairying. A means to assess the volume of such carbon and to move to return an economic value to landowners for the value of all carbon sinks, or to have the crown recognise the value of the carbon it can retain or increase within its land holdings.

Carbon has a value and a cost, the value of retaining carbon needs to be included in the TTPP plan and a means to do so identified and promoted.

The per ton value of this carbon can only increase into the near future, why are we not farming the natural resource and value that this provides in a less damaging and more sustainable way. Native forest and wetlands sequester far more carbon than land comparatively denuded for agriculture, mining or urban development. Biodiversity is necessary to maintain a healthy ecosystem and hence a better forest sequestration of carbon.

Our land and soils are our big export via coastal erosion. Agriculture and mining when poorly done exacerbates the erosion of our resources and results in negative gains for the entire country. On the Barrytown flats most of the land south of canoe creek has been cleared for

and destabilised by large gold dredging operations. As recently as the 1990s, old growth forest was buried and wetlands drained for dairy development. Whereas north of canoe creek there are larger stands of virgin native and regenerating bush. The Nikau Scenic Reserve is a great example of unmodified Sand Plain Forest. A beach walk in both these areas makes it obvious the difference between these two ends of the flats. With up to 1m deep chunks of land on the beach out the south end, and just salt damaged bush and normal rates of erosion northern end. Erosion rates appear far greater at the southern end.

Aerial imagery supplied.

Please consider policy 11,12,13,14,15 and 17 in the New Zealand coastal policy statement.

<https://www.doc.govt.nz/globalassets/documents/conservation/marine-and-coastal/coastal-management/nz-coastal-policy-statement-2010.pdf>

1951 and 1988 aerial images Sourced from <https://retrolens.nz> and licensed by LINZ CC-BY 3.0

TTPP Part 2 – District-Wide Matters- Te Wāhanga 2 - Ngā Kaupapa ā-Rohe Whānui Natural Environment Values - Ngā Uara Taiao AotūroaNC - Natural Character and the Margins of Waterbodies- Ngā Āhua me ngā Mahi ka Noho Hāngai ki ngā Hopua Wai

Rivers, streams, lakes and wetlands have important ecological, natural character and hydrological values and they provide important habitat for native plants, fish, birds, lizards, frogs, insects and aquatic and terrestrial macroinvertebrate aquatic life.

TTPP NCA41 Pakiroa Beach

Broad sweeping sandy / stony beach backed by an extensive dune field, coastal scrub and forest – at the northern end of Pakiroa Beach.

Natural qualities are clearly evident in the dune landform, wind-swept vegetation cover and their relationship with the Tasman Sea contribute to the feeling of naturalness.

Land use matters, which is why the ttp is such an important document. Let use this opportunity to do better for our land and our people.