

Te Tai o Poutini Proposed Plan

Submission Form

Your Details:

First Name **Karen** (known as Kair) Surname: **Lippiatt**

Submitting on behalf of **Individual**

Would you gain an advantage in trade through this submission? **No**

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Signature:

Date: 29/10/22

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

- Strategic Direction
- Mining Objectives
- Natural Environmental Values
- Zones
- Transport
- Hazards and Risks - Westport Hazard Overlay

I wish to speak to my submission

Yes I would consider presenting a joint case

General

This submission is presented in the order the topics are presented in the hard copy version.

The plan is too big and unwieldy a document for me to have the time to read, understand and write a comprehensive submission, so this submission is a collection of notes on things I have noticed in my several attempts to understand how to use the Plan.

My suggested rewording is in red and existing wording to be removed is in strikethrough.

No contents, not enough numbering of sections and subsections to make it easy for me to refer to specific paragraphs in this submission.

Part 1 Introduction and General Provisions

Zones

Special Purpose Zone Descriptions

3 are unique to this Plan, ie they are not on the National Planning Standard Table 13 List – I propose they are removed

BCZ Buller Coalfield Zone – completely superfluous, covered by MINZ (or it's replacement)

MINZ Mineral Extraction Zone – Strongly Disagree with this zone if it means any mining becomes a permitted activity

SVZ Scenic Visitor Zone – superfluous, covered by Settlement Zone

Part 2 District Wide Matters

Strategic Direction

MIN Mineral Extraction – Te Tango Kohuke

Nowhere should mineral extraction be a right, due to the invasive and damaging nature of the activity of mineral extraction on indigenous biodiversity and the wellbeing afforded to people by the recreational use of natural open space.

In considering mineral extraction, the hierarchy of avoidance, mitigation, and remediation must always be considered before offsetting or environmental compensation

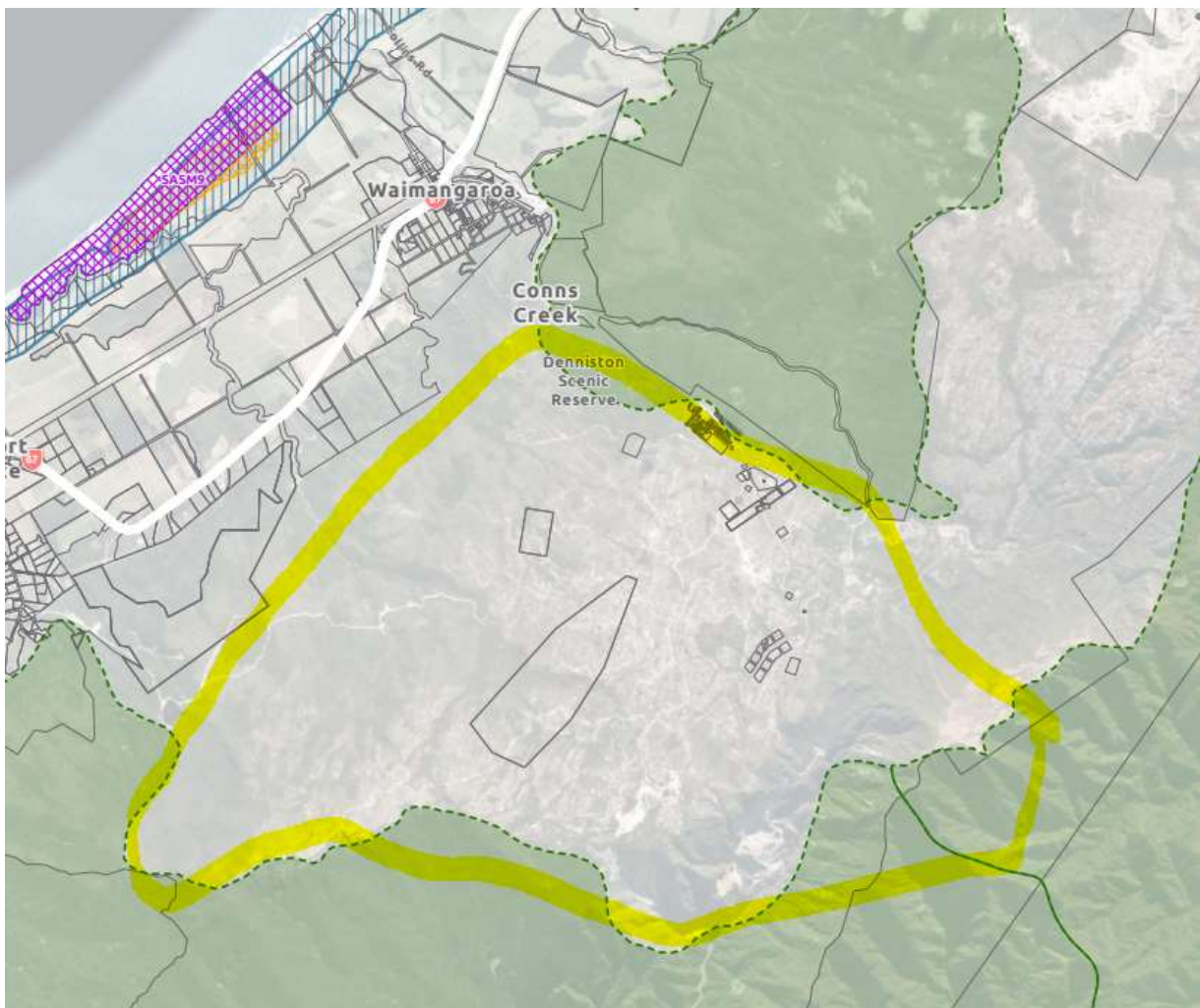
There is no need for a Mineral Extraction Zone. If the activity already has a permit I do not see why it needs a Special Zone.

MIN – O2 proposes that mineral extraction could be allowed in existing zoning areas such as Open Space Zone and Rural Zones. If that is the case, then there is no need for a Mineral Extraction Zone whatsoever.

MIN-03 To recognize that mineral resources are widespread and fixed in location throughout the West Coast/Te Tai o Poutini and that ~~provided adverse effects are managed, mineral extraction activities can be appropriate in a range of locations outside specified zones and precincts.~~ **significant unique geology and indigenous biodiversity is not relocatable in order to provide for mining.**

Therefore the hierarchy of avoidance, mitigation, and remediation must always be considered before offsetting or environmental compensation. Where offsetting or environmental compensation is considered it must be publicly notified.

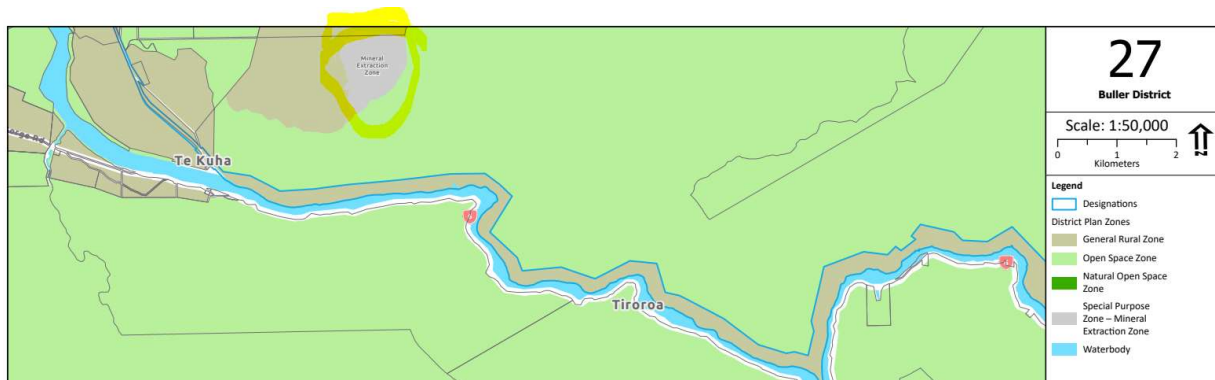
MIN-06 Remove b. In considering mineral extraction, the hierarchy of avoidance, mitigation, and remediation must always be considered before offsetting or environmental compensation



Map 23 I **object in the strongest terms possible to a designation of Mineral Extraction on any area of outstanding biodiversity and natural beauty, in this case, specifically at Denniston.** Denniston plateau to be included in the Outstanding Natural Landscape. See rough area circled in yellow above. A bioblitz found many unknown species still to be named.

Map 22,26, 27 Buller Zoning Mapbook

I object in the strongest terms possible to a designation of Mineral Extraction on any area of outstanding biodiversity and natural beauty, in this case, specifically at Te Kuha. This is the location of the only ephemeral wetland in the Ngakawau Ecological District and the area's largest population of Parkinson's rātā.



Remove the Mineral Extraction Zone circled in yellow.

NENV Natural Environment – Te Taiao

NENV-O3 b. the need for infrastructure to sometimes **very rarely** be located in significant areas

TRM Tourism Te Tāpoi

All the bullet points should be individual objectives, like other sections eg MIN

I particularly support:

2 support the development of cycling and walking connections between tourism sites

6 recognising the **cumulative** effects of visitors

UFD Urban form and development – Te āhua me te whanaketanga o te tāone

Generally support, and in particular 4. New developments in less hazardous areas, and

7. definitely support walking and cycling, suggest add micro mobility to transport modes

TRN Transport – Te Tūnuku

Generally support. More emphasis required on active transport of all variations e.g. walking, cycling, scooting, wheelchair, riding

Active transport is better located off road on a separate route from motorized transport.

Shared paths are a good start, but as active transport modes become more popular, council must make provision for the future separation of active modes in high use locations. In places where volume and speed of the different active modes determine, separate walking and cycling routes must be provided.

Overview

The West Coast/Te Tai o Poutini has an extensive road and rail network with a growing number of **active transport routes** (shared pathways).

TRN -03 To enable accessibility, safety and connectivity of land transport infrastructure and **consider provide for** the amenity of all transport users, including pedestrians and cyclists

TRN P7 for safety reasons I particularly support b. provide off road cycling and walking routes

TRN R5 and R10 Establishment of **active transport routes including** shared pathways, **including walkways, cycleways, and bridleways.**

Hazards and Risks. Particularly support:

NH-O4 To ensure the role of hazard mitigation played by natural features that minimise impacts of hazards including wetlands and dunes is recognized and protected

NH-P3 a. Promote use of natural features and appropriate risk management approaches in preference to hard engineering solutions in mitigating natural hazard risks.

Rules for the Coastal Severe and Coastal Alert Overlays

In general I support recognition of the danger to life and property of living in areas susceptible to natural hazards. I support prohibition of further development in hazardous areas as this will become a liability to the council that approved it.

However, there needs to be a transition, and this plan is making a good attempt at transitioning. As always the poorer are most constrained by the rules, for example, to rebuild with a certain timeframe.

So that the people do not become isolated and abandoned, the coastal settlements need community wide consultation on the way forward. This includes without having to write.

NH-R40 2. I agree that any increase in floor area should meet a predetermined annual exceedance probability (AEP) level. As there have been so many events recently dubbed 1 in 100 years, I think the

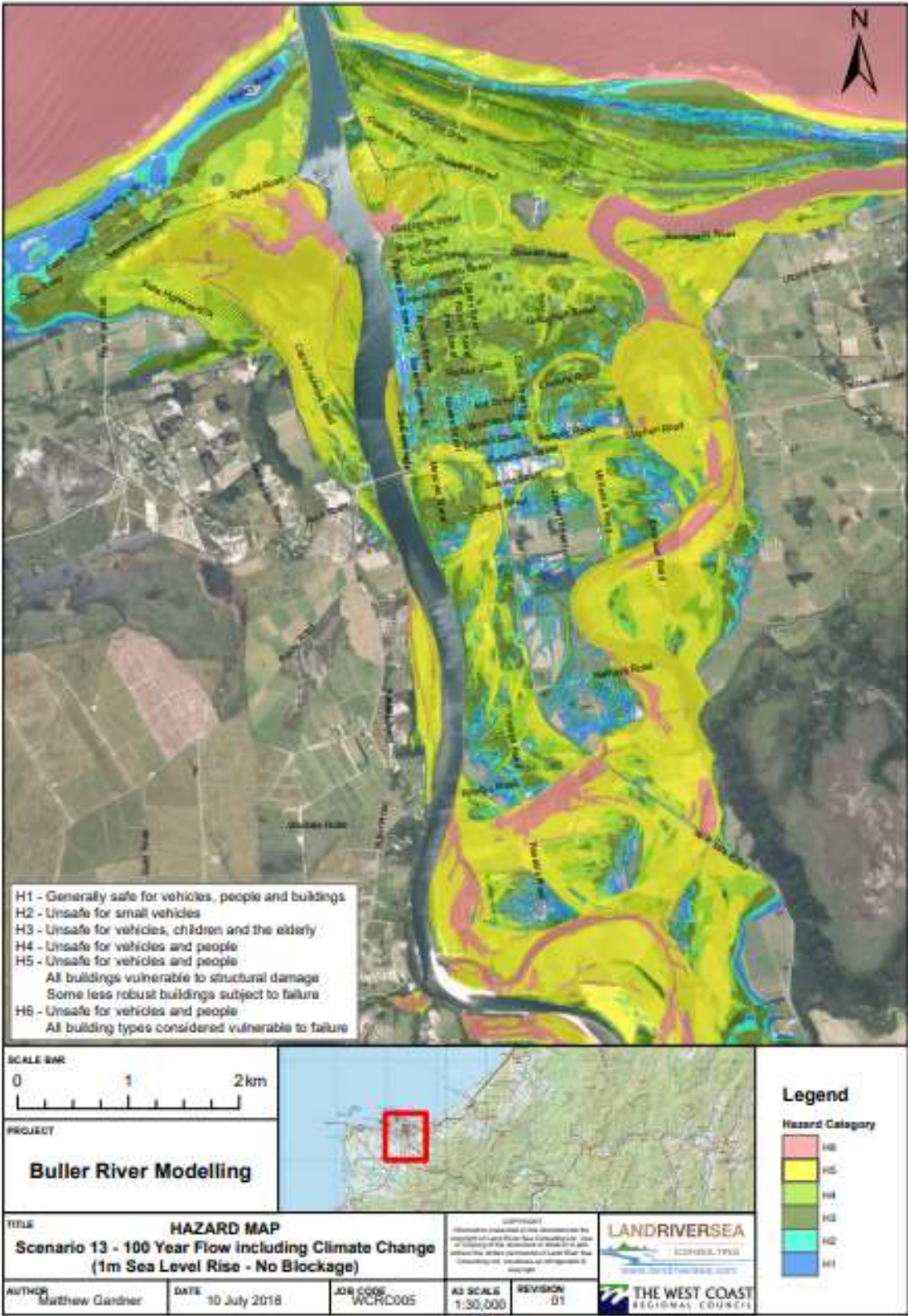
AEP level should probably be 1 in 500 years. However, without a map I can't say as the effect may be large, and it needs to be done in a planned manner.

I think the council should find a way to funnel a government fund to support all rebuilding to meet the agreed AEP level. This will be a cheaper resilience measure than moving people to completely new subdivisions.

Westport Hazard Overlay

As with Coastal Hazard Overlay, I think the council should find a way to funnel a government fund to support all rebuilding to meet the agreed AEP/AIP level. This will be a cheaper resilience measure than moving people to completely new subdivisions.

NH-R52 This needs a map to show where the land meets the criteria, such as the one below but with the Hazard category renamed to how high above the land a new building needs to be built to meet the AEP/ARI criteria.



From 2018 LRS Buller Combined Hazard Maps

ECO Ecosystems and Indigenous Biodiversity – Ngā Pūnaha Rauropi me to Kanorau Koiora

Totally support the preservation and restoration of indigenous biodiversity.

As pointed out in the Overview, the West Coast has the highest proportion of conservation land in the country. This council must seek government support to maintain that land as part of the National Adaptation Plan for the benefit of the whole country and prevent further species extinction.

ECO-02 Remove this Objective. It is self-contradictory. If an area is of significant indigenous vegetation or significant habitat to indigenous fauna, then it's ecosystem and biodiversity value can not be enhanced by turning it into a subdivision.

ECO-04 To maintain the range, diversity **and area** of ecosystems and indigenous species found on the West Coast/Te Tai o Poutini

ECO – P1 I support this clause for the mapping of areas of significant indigenous vegetation and fauna habitat.

ECO -P9 a. The goal of the biodiversity offsets is ~~no net loss and, preferably,~~ a net gain in biodiversity
d. The arrangements are legally binding in perpetuity

NFL Natural Features and Landscapes – Ngā Āhua me ngā Horanuku Aotūroa

The same comment as ECO-02. Remove this Objective. It is self-contradictory. If an area is of significant indigenous vegetation or significant habitat to indigenous fauna, then it's ecosystem and biodiversity value can not be enhanced by turning it into a subdivision.

NC – 01 Remove. The Plan is covering the need for resilience – building on the edge of a lake is not resilience. If it's not removed it needs measures in place, but it should be removed, as it's not consistent with coastal policy – why do I get prevented from building on my land on the coast while others get to build on the edge of a lake which can also rise in level.

Part 3 Area-Specific Matters

COMZ commercial Zone – Te Takiwā Pakihi

Need to be able to live in the commercial zone, I don't see if this is allowed in the rules,

BCZ Buller Coalfield Zone – Te takiwā Waro o Kawatiri

Objectives

Remove all references to the social wellbeing brought about by the Mineral Extraction.

Reason: Social wellbeing will be brought about by experiencing this area as a natural playground which Mineral Extraction will destroy.

BCZ -01 remove national significance

BCZ-02 Is very weak in the treatment of adverse effects, “minimises” seems loosely used, to really minimise would be to not go in at all.

Policies

BCZ-P1 Remove. Reasons:

- If the current mineral extraction is lawfully established, it doesn't need a special zone
- Growth and expansion do not meet the country's climate goals
- There can be no “managing” adverse effects on the environment when the activity itself (mineral extraction) desecrates the local flora and fauna, and the product creates greenhouse gases that lead to flooding and sea level rise.

BCZ-P2 needs an additional Policy to balance the access protection sought by mining interests. In order to protect people's interest in survival via the preservation of biodiversity, the additional policy should read “ **To prevent mine spoil covering the unique ancient bonsai forest in the unique gullies in the Buller Coalfield Zone**”.

BCZ-P4 very weak protection in the phrase “as far as practicable” needs to be much more stringent.

BCZ-P5 Remove. This hinges around the word necessary. I do not think any part of this mineral extraction is “necessary”. If it can be shown that in a circular economy it is required then I would consider it.

MINZ Mineral Extraction Zone – Te Takiwā Kohuke

I challenge the need for this zone. To pre-designate an area for mineral extraction is not compatible with climate change goals of reduction in deforestation

The Overview states that it is anticipated that there will continue to be widespread mineral extraction outside of the MINZ, which again indicates no need for a separate designation when it is clear there are expectations that the really necessary mineral extractions will be allowed under existing zones and designations.

MINZ -O1 Remove. Remove all references to the social wellbeing brought about by the Mineral Extraction. Reason: Social wellbeing will be brought about by experiencing this area as a natural playground which Mineral Extraction will destroy.

MINZ-P5 another oxymoron, there is no way that removal of an area of significant indigenous vegetation “cannot be avoided” unless a life is at stake.