

## Submission on the proposed Te Tai o Poutini Plan: A combined district plan for the West Coast

Submitter: Suzanne Hills, 2706 Coast Road, RD1, Runanga 7873

I am an individual submitter. I wish to speak to my submission.

[suzannedhills@gmail.com](mailto:suzannedhills@gmail.com)

028 415 6994

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### Comments on issues with making a submission and this submission

Use of "Plan" in this submission refers to the proposed Te Tai o Poutini Plan.

The Plan's maps lack functionality of use; both the paper and digital pdf versions. The maps are very difficult to negotiate and represent a barrier to people submitting on the Plan and using it going forward. The maps would be difficult enough with perfect vision, let alone if one doesn't or is colour blind or has difficulties deciphering layered patterns and colours. Critical information is contained in the maps and they should be easily accessible through searchable and layered vector maps.

The downloadable pdf version of the Plan does not include the contents and makes its use very frustrating and highly inefficient. Not everyone has unlimited internet access to search the digital Plan or ready access to a printed copy (where the list of contents do exist). The contents must be included in the downloadable pdf.

The majority of the Plan I either support, are neutral on, do not consider myself well enough informed to comment on, or have not had the stamina to read, understand and comment on (I imagine this is where many people have landed). Consequently my submission is focussed on some deficiencies of the Plan, in particular the overall permissiveness of extractive industries and continued indigenous vegetation clearance, and the less than adequate protections for maintaining and protecting natural ecosystems in their healthy, flourishing state. That said, I do wish to acknowledge the work of the planners and the positive and progressive elements of the Plan towards a sustainable and decarbonised near future. However, it remains deeply concerning that these critical outcomes feature as only minor and peripheral aspects of the Plan, rather than sustainability, decarbonisation and climate stability being at the centre of land and resource development and use.

### General Concerns

#### **Complexity**

The Plan is overly complex, both with its multiplicity of zones and overlays, and the activity listings for numerous activity status classes of permitted, controlled, restricted discretionary, discretionary, non-complying.

#### **Disproportionate emphasis and permissiveness of some activities**

The Plan contains much detail on mineral extraction activities and its emphasis is disproportionate to the many other activities of resource and land use on the West Coast. This has been at the expense not developing objectives, policies and rules for areas that are equally or more important, such waste management and emissions reduction.

For a number of activities, most notably mineral extraction, there is a bias towards an activity status of permitted or controlled. Many of these activities have effects that are likely to be more than minor and should be classed as discretionary.

## **Grammar**

Throughout the Plan there is the use of semi colon, and & or at the end of rule statements. While and & or is clear, the absence of and & or with a semicolon is entirely unclear. People are not planners; rules need to be written in a way that is unequivocal and easily understood by everyone.

## **Key defining words and phrases**

Throughout the Plan there is an interchangeable use of key defining words or phrases, not all of which are listed in the definitions. All these key words phrases must be defined in the definitions, used 100% consistently in Plan and be consistent with the same definitions in the RMA and the RPS.

Example 1: *significant natural area, significant indigenous vegetation, significant habitats of indigenous fauna, and significant indigenous biodiversity.*

Example 2: *many and varied words and phrases for cultural uses*

Example 3: *Site, title, legal title.*

## **Adverse effects hierarchy**

The RMA has a clear hierarchy of addressing adverse effects on the environment of: avoid, remedy, and mitigate. If this is not possible then the RPS makes it clear: *in some instances it may be acceptable to allow residual effects to be addressed by biodiversity offset or environmental compensation*

Offsetting and compensation are not alternatives to the RMA imperative of avoid, remedy and mitigate. Some objectives and policies, notably for mineral extraction, infer or state otherwise.

## **Framing of objectives**

I struggle with the way objectives are framed in the Plan. Objectives written as outcomes are much clearer, e.g. ECO O4: To maintain the range and diversity of ecosystems and indigenous species found on the West Coast/Te Tai o Poutini. Written as an outcome it would read: the range and diversity of ecosystems and indigenous species found on the West Coast/Te Tai o Poutini is being maintained.

## **Reverse Sensitivity**

MIN O4 from the strategic objectives section on reverse sensitivity reappears in various forms throughout the Plan regarding mineral extraction. The objective to ensure reverse sensitivity from new subdivisions does not compromise existing mineral extraction activities is applicable in the converse: to ensure reverse sensitivity from new mineral extraction does not compromise established residents or their activities, e.g. in the Rural Zone: **To ensure that new mineral extraction, use and development does not compromise established rural residents or their land use activities, including through reverse sensitivity to residents' wellbeing thresholds to dust, noise and traffic.** An example: the proposed mineral extraction on the Barrytown Flats. In this case it is the proposed new mineral extraction that is subject to the reverse sensitivity from the established presence of people (& their wellbeing needs) that live in the area. If genuine consideration was given to social and wellbeing factors along with economic ones, then minimising reverse sensitivity effects from new economic developments compromising existing places of residence would also be stated in the plan.

## **Strategic Direction**

### **Strategic Objectives Title Page and preamble**

The title page states it will set the strategic direction for the plan in relation to six significant resource management issues including climate change. But there is no strategic direction chapter on climate change as there is for the other five issues identified. There is only a limited reference within

the connections and resilience objectives of: *recognising the effects **of** climate change and the need to adapt*. Effects **on** climate change and the urgent need for emission reduction and decarbonisation have not been addressed. This does not meet the requirement under the Resource Management Amendment Act 2020 (RMAA2020) that comes into force on a date no later than 30 November 2022.

*Councils must have regard to emission reduction plans and national adaptation plans under the Climate Change Response Act 2002 (as amended by the Climate Change Response (zero Carbon) Amendment Act) when making and amending regional policy statements, regional plans and district plans.*

The parts of the Plan that have not yet come into legal effect, and will not do so until after 30 November 2022, are clearly required to have regard to the national emission reduction plans under the RMAA2020.

Beyond the statutory requirements, with New Zealand's declared climate crisis and the terrible impacts now starting to devastate communities, livelihoods and nature, the Plan committee holds the responsibility to address this critical issue and engage with West Coast people to come up with broad and imaginative thinking and help put the region on a pathway of decarbonisation and sustainability. Anything less severely reduces the options available to West Coast youth and future generations. Additionally it is an economically prudent pathway: the Climate Change Commission has predicted that the cost of decarbonisation is 1% of GDP, but inaction is likely to be much higher at +3% of GDP.

Excluding emission reduction in the Plan is another massive lost opportunity to receive wide-ranging feedback from a cross-section of the community. Through exclusion, valuable feedback and contributions on emission reduction will invariably be limited. Emission reduction and keeping natural carbon sinks healthy and functional is everyone's business and it is unacceptable that the Plan committee decided not to include this. Everyone can help to develop a progressive plan that starts the region on a low emission sustainable pathway in order to create a better future for all.

***Decision sought: Comply with the RMAA2020 and include emission reduction and decarbonisation as a strategic objective.***

This could be along the lines of: *facilitate the reduction of regional carbon emissions in line with national emission reduction plans and carbon budgets.*

The strategic directions overview and list of *intended to demonstrate* points puts a greater emphasis on development rather than controlling land use activities for the purposes of use, development and protection in an integrated way.

# 2 should read *maintaining **and enhancing** environmental quality*. Enhancing is critical due to the added stresses of climate change on ecosystems but also because previous district plans have not maintained environmental quality but rather they have resulted in environmental degradation. Clear evidence of this is shown in the Lois Easton report dated Feb 2020 on the extensive loss of indigenous vegetation, including wetlands, of 10,029ha over the period 2001-18.

# 5: A **sustainable** economy to sustain and enhance the health and wellbeing of people, communities and ecosystems is the goal, not a *prosperous* economy. At the very least it should read a *prosperous and sustainable economy*. We've had a prosperous growth economy and with it high carbon emissions, waste, pollution, stress to people & the environment, unaffordable housing, biodiversity loss, modern illnesses etc that have brought us to the climate, ecological & health crises. This statement also does not align with DWC's Whanaketanga mission of:

*Te Whanaketanga Our Mission: To create a sustainable, inclusive and prosperous future for Te Tai o Poutini that our people can be proud of and our rangatahi (young people) can look forward to.*

The statement: *For the purposes of preparing, changing, interpreting, and implementing Te Tai o Poutini Plan, all other objectives and policies in all other chapters of this Plan are to be read and achieved in a manner consistent with these Strategic Directions*, is inherently problematic and

fundamentally flawed. Objectives and policies will and do clash and are invariably resolved or justified by “balancing” one against the other. This balancing act has proved to be an impossible task and leads to winners and losers. The climate and biodiversity crises are evidence that nature and ecosystems have lost. Hard bottom lines are needed in order for land and resource development and use decision-making to be centred on sustainability and decarbonisation to achieve climate stability and a liveable future for all.

#### Mineral Extraction Strategic Objectives

MIN O1 & O2: Oppose zones of the Buller Coalfield Zone and the Mineral Extraction Zone. As inferred in MIN O1, they appear to have been created in order to avoid the RMA resource consent process and instead rely on an ill thought out system of management plans. The resource consent process is robust, participatory and democratic good process to ensure resource use and development decisions meet the sustainable management purpose of the RMA. This process must not be undermined; it is fundamental to uphold democracy, social cohesion and protection of the environment.

MIN O6: Without SNA identification in Buller and Westland, and no listings of significant indigenous vegetation and significant fauna habitat for those districts to be found in the Schedules, MIN O6 puts significant ecosystems and biodiversity at risk.

MIN O6 b: Allowing adverse effects to be addressed by alternative mitigation measures such as biodiversity offsetting and environmental compensation does nothing for unique and precious places such as Te Kuha – they would still be forever destroyed and lost as they cannot be restored to their former beautifully complicated and interdependent states of being. MIN O6 b states *allow* without the context of the RPS: *in some instances it may be acceptable to allow residual effects to be addressed by biodiversity offset or environmental compensation.*

MIN O6 b encompasses all adverse effects, including MIN O6 a *vi. The wellbeing of people and communities.* Addressing wellbeing adverse effects through biodiversity offset or environmental compensation does and cannot compensate for people’s stress due to poor sleep, children unable to walk or bike to school due to heavy traffic movements etc.

**Decision sought: rewrite MIN O1, O2 and O6 reflecting above comments.**

#### Natural Environment Strategic Objectives

NENV O3 should not be at the expense of not protecting other significant natural ecosystems and habitats, particularly as most public conservation land (PCL) is at higher elevations and severely fragmented on coastal lowlands. While PCL does make up a substantial contribution, lowland and coastal ecosystems are not well-represented, particularly the important and interdependent nature of ki uta ki tai/from the mountains to the sea and river flats. Just because 84% of the West Coast is PCL, it doesn’t lessen the need to protect significant natural heritage outside of it; NENV O3 reads as implying it is less necessary.

**Decision sought: rewrite NENV O3 reflecting above comments.**

#### Tourism Strategic Objectives

TRM O1: *Supporting the development of visitor facilities and accommodation...and on public conservation land where appropriate* does not align with Policy 10 Accommodation and Related Facilities of Conservation General Policy:

*Policy 10 (a) Accommodation and related facilities on public conservation lands and waters may be allowed for public recreation, educational and community services, consistent with the outcomes planned for places.*

i.e. in keeping with conservation legislation, facilities are for public recreation, education and community services, not for tourism and economic benefits.

**Decision sought: rewrite TRM O1 reflecting above comments.**

### **Energy Infrastructure and Transport**

**Decision sought: Include a strategic objective on the development and implementation of a regional renewable energy strategy.** Without this, piecemeal hydro schemes will continue to be proposed and consented without consideration of cumulative effects and how a scheme fits into the wider regional cost/benefit and best alternatives. Take ENG P2 as an example. There is no consideration of cumulative effects of multiple small scale run-of-river hydro schemes that would result in the degradation of multiple wild rivers/creeks compared with generation benefits of larger schemes on already degraded landscapes or utility scale wind. The wild unmodified creeks and rivers of the West Coast are an asset to nature tourism, public recreation and ecosystem health and integrity. With the majority of rivers around the globe now modified in some form, we should be placing the highest value on the remaining wild creeks and rivers of the West Coast.

### **Transport**

As there is no strategic objective on emission reduction, this imperative does not come through strongly in this section. A significant proportion of NZ emissions are due to transport and this needs more consideration. There could be much bolder objectives & policies enabling/supporting active transport and reducing vehicle movements, e.g.

- The creation of vehicle free areas within the CBDs, even if it starts small and grows e.g. on Sundays and out of hours. How great would it be for kids and families and older people if they know they can safely cycle/walk/scoot/skate/use mobility scooters around the central streets. Vehicle free areas provide for vibrant CBDs – for residents, businesses and visitors alike.
- Enable safe cycling corridors close to the towns where potential growth in uptake of cycling is highest e.g. the few kilometres from Taylorville turnoff leading to Cobden bridge is particularly hazardous with dangerous pinch points on rail overpasses and along Cobden cliffs. If this was safe, more people might cycle in from Runanga and other nearby settlements.
- Transport as a service rather than ownership, particularly important with transition to EVs. E.g. car parking & charging spaces for operators of rent per hour schemes.
- Shared community owned EVs.
- Community ride sharing schemes.
- Rent per hour ebikes for use in CBDs.

**Decision sought: review this section to enable a significant reduction in regional transport emissions.**

TRN R12. Amend. **Decision sought: Reconsider this rule and TRN S14 regarding cumulative effects from heavy vehicle movements.** Reason: This restricted discretionary activity applies to high trip generating transport activities defined for mining and quarrying as 30+ hvm/d. It does not consider how cumulative effects of several mining or quarrying activities (that individually may generate less than 30hvm/d) will be adequately mitigated. To give context, Westland Milk tankers transiting SH6 are in the range of 20-30hvm/d and result in adverse effects of noise, road safety (on many corners they need to straddle the centre line in order to negotiate), safety risk to cyclists and road damage. The threshold in TRN S14 #4 of 250hvm/day is arbitrary and excessive; it should be considerably lower and explicitly state that it is cumulative of all heavy vehicle movements.

## Hazards and Risks

### Natural Hazards

**Decision sought: NH P4 include additional point of seawater incursion into groundwater.**

### Natural Environment Values

#### Ecosystems and Indigenous Biodiversity

The core elements of the Ecosystems and Indigenous Biological Diversity section of the RPS which are to protect SNAs and maintain the region's indigenous biological diversity have cascaded haphazardly into the Plan. E.g. ECO O2: This needs to be aligned with the RPS which states *allowing for activities with no more than minor adverse effects provided that the values of the SNA are maintained*. *Minor adverse effects* has been translated into *appropriate* in Plan. *Appropriate* is terribly vague and open to interpretation; *minor adverse effects* is defined and measurable.

ECO O1: needs to include "and map".

ECO P1: The Grey District also needs to be subject to ECO P1 i to iv in order for SNAs in Grey continue to be identified and scheduled. Areas of significant indigenous vegetation are present in the Grey District that are not currently in Schedule 4 but likely meet the SNA criteria in Appendix 1 of the RPS. There are several examples of remnant indigenous coastal forests on the Barrytown Flats that are not in Schedule 4.

Identifying SNAs in Buller and Westland through the resource consent process is a haphazard and an extremely slow approach. It does not comply with Objective 1 or Policy 1 in section 7 of the RPS and the councils' obligation to protect significant indigenous biodiversity. This is an overly permissive approach, and even though it is pleasing to see a completion timeframe of 2027, there needs to be better control between now and 2027 to prevent further biodiversity loss.

It is unclear how the rules intended to restrict activities in SNAs can be effectively applied to potential SNAs yet to be identified. It puts significant ecosystems and biodiversity at risk.

ECO P2 e: *has no more than minor adverse effects on the significant indigenous vegetation or fauna habitat* must apply to points a-d; it is not clear that it does because of the inconsistent use of and, or & semi colon. Multiple minor adverse effects could result in a more than minor cumulative effect; no more than minor cumulative effects should be stated.

ECO P3, P4, P5, P6 P7, P8 & P9: set some useful and clear considerations, but the provisions don't go far enough to give effect to the RPS. E.g. ECO P7 h on biodiversity offsetting and compensation are distilled from the RPS and lost some meaning as is the case for ECO P9. It would be better to refer both to the relevant sections of the RPS and the NZ Government guidance on biodiversity offsetting as this is an area fraught with difficulties.

ECO R1: This rule for Grey District is stating that outside of the Coastal Environment, only indigenous vegetation of SNAs and Outstanding Natural Landscapes listed in the Schedules are protected from clearance. This still leaves significant indigenous vegetation at risk from clearance since there remain areas that have not been identified as either SNAs or ONLs. Further to this, Grey Council's responsibility to maintain the region's indigenous biological diversity is not limited to that residing in SNAs or ONLs. Additionally, the clearance rule for Buller and Westland does not exclude Outstanding Natural Landscapes, even though they have been identified for these districts and are listed in Schedule 5. This is regionally inconsistent and inappropriate for a combined district plan.

For Buller and Westland where SNAs have not been identified and will not be complete until 2027, the clearance rule of 0.5ha/site/3 years (outside of the Coastal Environment) for no reason or purpose leaves biodiversity at risk. 0.5ha is not insignificant; and cumulatively the loss could amount to hundreds of hectares between now and 2027. The blanket rule of 0.5ha/3 years (and 5ha/site/3 yrs for manuka, kanuka and bracken <15yrs) in addition to the listed purposes is unnecessary and has no justification. It is a rollover of existing plans and plays into the hands of the loud but very much the minority of landowners who've threatened to destroy swathes of indigenous vegetation. Most landowners are highly responsible and value remaining indigenous vegetation cover. This rule appears to be an attempt to pacify the bullies and will likely contribute to the continued decline in the region's indigenous biodiversity. Kanuka and manuka, and even bracken, less than 15 years are carbon sinks and provide nursery grounds for emerging indigenous vegetation. Why treat manuka and kanuka any differently to other indigenous vegetation cover? The effort required to restore 5ha back into kanuka and manuka as is happening in many other parts of NZ makes the permissive clearance rule of 5ha/3 years excessive. Just because these species are common on the West Coast doesn't mean they are not significant. It is recognised and stated in the RPS *that it is more efficient to maintain rather than to restore indigenous biological diversity.*

ECO R1 3 i: Oppose. **Decision sought: delete.** Reason: with the mandate to protect biodiversity the sanctioning of vegetation clearance to aid the removal of windthrown timber is not justified.

ECO R2: *The indigenous vegetation clearance does not disturb, damage or destroy nesting areas or habitat of protected species.* Who decides if it disturbs, damages or destroys nesting areas or habitats of protected species for a permitted activity rule? The land owner who wishes to clear the vegetation? Because this is a permitted activity it is open to abuse and puts remaining coastal indigenous vegetation at risk. Again it is unclear if the 500m2 is a blanket clearance rule for any purpose, or a capping rule for the stated purposes. Point 4 puts indigenous vegetation in the Buller and Westland coastal environment at risk since SNAs are not yet identified for these districts.

The implementation plan for the ANZBS2020 details dozens of specific actions and timeframes with regional and unitary councils identified as the lead agency. While appreciating this is a non-statutory instrument, it needs to be integrated in the Plan and it is not apparent that this has occurred.

**Decision sought: rewrite ECO section reflecting all of above comments.**

#### Natural Features and Landscapes

ONL44: From what I can decipher given the difficulties of using both the paper and digital pdf Plan maps, the northern limit of ONL44 cuts directly through the 79ha bush block at 3342 Coast Rd (under a QEII conservation covenant, and of which, together with my partner, I hold title to). This appears to be a very arbitrary line and makes no sense. At the very least ONL44 should include the entirety of the 3342 Coast Road land parcel. But the question remains as to why ONL44 does not extend northward to Razorback Point as the landscape features north of the line through 3342 Coast Rd continue as described for ONL44 in Schedule 5. **Decision sought: revisit north boundary of ONL44 and consider extending.**

#### Subdivision

Please consider enabling objectives and policies for the tiny house movement, including tiny houses on wheels (THOWs). They are very low impact, meet the needs of many and there exist

opportunities to provide subdivisions for tiny house villages in or near to West Coast towns or settlements. They could include both purchase and lease of land plots for tiny houses. Villages that are designed for community living, sharing resources, skills and facilities to further reduce impact such as produce gardens, composting bins, fruit orchards, shared EVs, communal outdoor areas & laundries, multi-generational & multi-cultural living, projects to enhance the environment like trapping and native plantings etc .The West Coast could have a range of fantastic tiny house villages that showcase sustainable living principles of fulfilment, wellbeing, care and reciprocity. They have the potential to attract new people to the area and with it bringing the benefits of their wealth, skills, passion and ideas. Importantly too, they are an affordable first home for younger generations, and going further these villages could partner with the polytech & building apprenticeship schemes for young people to learn & gain a skill set to build their own.

**Decision sought: review this section to enable the tiny house movement and its contribution to the sustainable use of land and resources.**

### **General District Wide Matters**

#### Coastal Environment

The NZCPS is inconsistently applied. Inconsistencies exist between policies and rules. The TTPP mapping of the coastal environment is also inconsistent and sometimes plainly illogical.

**Decision sought: Review all Coastal Environment map overlays. Review this section to ensure consistency with the NZCPS.**

#### Light

The West Coast is blessed with a low level of light pollution and the joy of being able to experience the Milky Way and even the two Magellanic Clouds; dwarf galaxies that are over 160,000 light years away. A majority of the global population can no longer even see stars. West Coast dark skies are an asset with benefits to nature tourism, communities, wellbeing and indigenous species. Please consider the ongoing protection of the dark skies. In particular, please consider specific rules for the Punakaiki/Barrytown Flats area for April to December, most importantly during the Westland petrel/Taiko fledging season of Oct-Jan. Rules aligning with the requirements of dark skies park by International Dark Skies may well be a small investment and behaviour change to protect and improve West Coast dark skies. There may be minimal retro fitting and inconvenience to people (close curtains at night, outside lights on motion sensors). People who live on this section of the Coast Road care about the Taiko and want to see the population thrive so it would likely be very well received. It could be the start of community and council cooperation to achieve a Dark Skies Park designation as has happened in other parts of NZ/Aotearoa to the benefit of local people's wellbeing, wildlife and nature tourism.

**Decision sought: consider incorporating International Dark Skies park criteria for Barrytown Flats/Punakaiki.**

### **Area Specific Matters: Zones and Development Areas**

#### Natural Open Space Zone and Open Space Zone

The zoning of public conservation land (PCL) into district council zones is fraught with difficulties and implications, e.g. OSZ R19 on mineral extraction is listed as a restricted discretionary activity: so this would mean resource consent from the district council is needed in addition to the DOC Access Arrangement? Land use consenting on PCL is the responsibility of DOC and comes under conservation legalisation (and Crown Minerals Act for mineral extraction) not the RMA (except



where has effect beyond the boundary of the PCL, e.g. water take resource consents for hydro developments). PCL already has a suitable zone name: public conservation land. Calling it something else by applying district council zoning designation is inappropriate and unnecessary.

**Decision sought: remove district council zoning of public conservation land.**

### General Rural Zone

From pg 403: *recognition that mineral extraction is an accepted and ongoing activity within rural areas*. This is a highly presumptuous statement. Mineral extraction is not accepted on an industrial scale in a rural environment. Perhaps the TTPP committee members could ask themselves how they might feel about living next to a 24/7 industrial mining operation in a rural area?

RURZ O5. RURZ P18, P19, P21, P22 & P25 . Oppose. **Decision Sought: remove.** Reasons: It is unnecessary to have a mineral extraction objective and associated policies for the rural zone. All of the policy details are covered by the resource consent process and mineral extraction must remain a discretionary activity requiring resource consent in the rural zone. The Plan is biased towards enabling extractive industries and these objectives and rules appear as a means to avoid the resource consent process. The bias is clear, e.g. RURZ P19 b prioritises mineral extraction over health and wellbeing of people and communities. If was prioritised the other way around it would read along lines of: Where the effects of mineral extraction are incompatible with rural activities, mineral extraction activities are not established close to existing rural activities.

RURZ P15 See comment made at beginning of this submission on reverse sensitivity. **Decision sought: rewrite to clarify that reverse sensitivity of new developments from existing rural uses and consented activities encompasses all new developments, including new mineral extraction activities.**

RURZ P24. Oppose. **Decision Sought: remove.** Reasons: a mineral extraction zone and all its inherent restrictions on land use and activities should not take precedence over a long established rural zone that allows a reasonable diversity of land use, lifestyles and future options.

GRUZ R12. Oppose. **Decision sought: remove GRUZ R12 and make mineral extraction a discretionary activity in the Rural Zone.** Reasons: This is an entirely inappropriate and unacceptable permitted activity in the rural zone. Even just one of these highly permissive mineral extraction activities operating to or near the limits will be significant in terms of land size, scale and impact of effects. The cumulative effects of several of these permitted activities running concurrently will be very significant and a real possibility given the public statements made by TIGA on their mining intentions for the Barrytown Flats. This rule has no control or management mechanism over cumulative effects of light, dust, noise, traffic, visual, ecological impacts etc of multiple concurrent mineral extraction sites and is an astonishing oversight. It again demonstrates the bias towards mineral extraction industries rather than people. Yet as stated in the RPS: *People are at the heart of this RPS. All district and regional plans should have regard to people and communities and their need for a healthy environment, well managed infrastructure, employment, business opportunities and education for their wellbeing and long-term economic success.* It is councils over the years who have permitted 1ha subdivisions in the rural zone so many rural areas no longer consist of farms with a low population density, but are a mix of farming and rural lifestyle living. This rule diminishes and excludes options for residents and communities to object or modify conditions. It has the potential to create many instances of conflict and is not conducive to social cohesion and working together to create a better world. Potentially it could result in piecemeal subdivision and mining of 4ha blocks without either the need for a Mineral Extraction Management Plan as proposed for the MINZ or the

good process of *resource consent to control land use activities for the purposes of use, development and protection in an integrated way.*

This rule puts biodiversity at risk for areas where significant indigenous vegetation or significant indigenous fauna habitat have not yet been identified as in Buller and Westland districts, and not yet identified in Schedule 4 for the Grey district. Barrytown Flats has remnants of significant indigenous vegetation or significant indigenous fauna habitat that have not yet been identified as SNAs and listed in Schedule 4.

GRUZ R18. Oppose. **Decision sought: remove and make mineral extraction a discretionary activity in the Rural Zone.** Reasons: as given above. Schedule 10 is blank, making this rule irrelevant.

GRUZ R25. Oppose. **Decision sought: remove and make a discretionary activity with controls in place over cumulative adverse effects from potential of multiple concurrent mining operations.** Reasons: as given above.

The 79ha block of land at 3342 Coast Road is zoned as rural but to the north and south the land parcels are zoned as rural lifestyle. The GRUZ is defined as: *Areas used predominantly for primary production activities.* This does not apply to 3342 Coast Road. The vast majority is indigenous forest and protected under a QEII conservation covenant. Only 0.3ha is excluded from the covenant – for the most part an already cleared area. This 0.3ha is the only legal site for a future dwelling under the covenant. Therefore the land parcel is essentially rural lifestyle and should be zoned as such and would be in keeping with the adjacent land parcels. **Decision sought: zone as rural lifestyle.**

#### Rural Lifestyle Zone

RLZ R1: Amend. **Decision sought: Amend #7 on beekeeping to including all districts.** Reasons: this is a sensible rule, particularly 7i. If this has come about because of issues in Westland then it is potentially a regional one too; as a combined district plan it makes sense for it to apply to all districts.

RLZ R15. Oppose. **Decision sought mineral extraction is a discretionary activity.** Reasons: mineral extraction ranges from an artisan to industrial scale and a discretionary activity status is appropriate for industrial scale activities. For completeness, SNAs should be included in #1.

Commercial dog kennels are not appropriate for a rural lifestyle zone with sites as small as 1ha. It is not clear in the rules where this activity sits. **Decision sought: commercial dog kennels are a non-complying or prohibited activity in the RLZ or the very least clarify that they do not come under a permitted or controlled activity.**

#### Mineral Extraction Zone

The MINZ preamble states: *The MINZ - Mineral Extraction Zone covers areas where there are discrete, long term mineral extraction activities that are currently authorised. This authorisation is from three different mechanisms and includes:*

- 1. Coal mining licences under the Coal Mines Act (1979);*
- 2. Ancillary coal mining licences under the Coal Mines Act (1979); and*
- 3. Resource consents issued under the Resource Management Act (1991).*

MINZ on Barrytown Flats. Oppose. **Decision sought: revert to Rural Zone.** Reasons: The proposed MINZ on the Barrytown Flats does not meet the above criteria. It is not an area where there is a mineral extraction activity that is currently authorised under resource consents because they were

declined by independent commissioners in February 2022. As it does not meet the MINZ criteria, it cannot be a MINZ and must therefore remain as a Rural Zone in keeping with the surrounding rural zoned land. Further, to zone as a MINZ on the expectation that any potential reapplications will be granted is tendentious and demonstrates the mineral extraction bias of the Plan. It is understood this MINZ zoning also goes against the recommendation of the TTPP planners to the TTPP committee.

Mineral Extraction Zone designation and all its objectives, policies and rules. **Oppose. Decision sought: remove this zoning designation from the plan.** Reasons: It is unnecessary and appears to be introduced in order to rip away the resource consent process. MINZ R2 and R3 are permitted activities enabling mining without resource consents (outside of those affecting waterbodies). Instead the rules rely on a substantially less robust Mineral Extraction Management Plan. The lack of detail in Appendix 7 on Mineral Extraction Management Plans provides little reassurance regarding the complexity of the identification and management of adverse effects and compliance to plans. All of the objectives, policies and rules detailed in the MINZ are comprehensively dealt with by the resource consent process under the RMA and are covered through mineral extraction designated as a discretionary activity in appropriate existing zones. The resource consent process is a robust, participatory and democratic good process to ensure land use and development decisions meet the sustainable management purpose of the RMA. This process should not be undermined by self-interest; good process is a fundamental to uphold democracy and social cohesion. This is another reason why the Barrytown Flats MINZ designation is unacceptable: it enables the authorisation of industrial scale mining via the pathway of the highly dubious Mineral Extraction Management Plan system without the need for resource consent from the Grey District Council.

#### Buller Coalfield Zone

Buller Coalfield Zone designation and all its objectives, policies and rules. **Oppose. Decision sought: remove from the plan.** Reasons: same as given for the Mineral Extraction zone above. This zoning is unnecessary as existing authorised activities are able to continue regardless. Currently unconsented new and expanded coal mines are entirely unacceptable for locking in continued greenhouse gas emissions and all the terrible consequences to climate stability for decades to come. Any short term economic contribution of coal mining to the region is far outweighed by the disastrous consequences. Coal mining is a sunset industry and the best course of action is for West Coast leadership to recognise this and develop a regional strategy and plan to transition away from coal mining. And that starts with no new or expanded coalmines.

The opportunity exists for the Plan to have a progressive approach that benefits the regional economy, social wellbeing and the environment. If the Plan had objectives and policies that committed to phasing out coal mining with no new or extended coal mines then local leadership would be in a strong position to negotiate with central government for financial support packages to transition to alternative initiatives and enterprises as has happened in the Taranaki region. The West Coast has had millions invested through Jobs for Nature; demonstrating the possibilities but it needs clear commitments in the Plan. Possibilities are numerous: a Conservation Hub/Centre of Excellence for research & training akin to the forestry centre in Rotorua, grow domestic & international nature tourism through linking up existing long distance cycleways, grow the population by attracting people to move to the area (e.g. work from home, home businesses) and thereby grow the rates base and local economic activity, negotiate compensation or funding from central government to invest in browsing herbivore & predator control to maintain and enhance natural ecosystems as healthy and functional carbon sinks, tiny/small house sustainable villages, made on West Coast built to last brand of high quality consumer goods, more native nurseries to supply demand from around

the country, more central government funding for ecosystem restoration of wetlands and riparian plantings...

**Decision sought: Amend the Plan to enable the necessary and urgent step change to a lower emission & sustainable regional economy with a clear pathway to decarbonisation.** It's nowhere near enough to tinker at the edges with enabling provisions on cycleways and renewable energy while choosing to ignore the emission elephant in the room: coal mining expansion and growth.

## Re: S Hills submission




Suzanne Hills <[suzannedhills@gmail.com](mailto:suzannedhills@gmail.com)>

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It has been brought to my attention the need to answer 2 generic questions with my submission. Can you please accept below as part of my submission or do I need to update & resubmit?

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

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 submission

Thank you

Suzanne Hills

On Mon, 31 Oct 2022, 5:05 pm Suzanne Hills, <[suzannedhills@gmail.com](mailto:suzannedhills@gmail.com)> wrote:

Hello

Attached is my TPPP submission.

Please confirm you have received it.

Thank you

Suzanne Hills