

Submission on Te Tai o Poutini Plan Proposed Plan

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I am an individual submitter. I will not gain an advantage in trade competition through this submission.

I do not wish to speak to my submission.

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General Comments.

In September 2018, the Local Government Commission in its report 'Final Proposal for combined West Coast District Plan' stated that it was intended to promote "the purpose of local government and facilitate improved economic performance on the West Coast."

"Good-quality performance of regulatory functions, means it is efficient, effective and appropriate to present and anticipated future needs."

It states the plan will bring:

- *efficiencies*
- *effectiveness*
- *present and anticipated future circumstances* relating to resource management issues needing to be addressed, including growing awareness and understanding of:
 - appropriate responses to matters such as climate change and natural hazards
 - matters relating to issues of significance to iwi/Māori
 - public expectations relating to resource management and environmental protection generally.

The proposed version of the Tai O Poutini One Plan (the Plan) plan does not fulfil these objectives.

There are a number of challenges for any planners on the West Coast, with a diverse range of interests that need to be taken into account. I feel that the Plan leans to the side of the extractive industries and traditional farming. It is not a good plan for the future. It has very little analysis of future needs as affected by climate change and natural hazards. It does not acknowledge that we need to change the economic base by moving away from the extractive industries. The plan itself is complex and confusing, it needs to be simplified. The various zones with overlying layers and precincts confuse the reader and the purpose of the plan.

I do not have the expertise to comment on all parts of the Plan, so I have restricted my comments to more general points.

Maps. The maps are difficult to use as many areas outside of the urban areas show as unknown address and so it's difficult to understand what layers and zones apply to these areas. So the plan could not be used by a person seeking to buy or develop one of these areas, as they would not know what the restrictions are on the piece of land.

Decision sought: Improve the online mapping function to make it more comprehensive, to truly reflect the various zones, layers and precincts of the actual plan, and to be able to look up detail on all areas on the West Coast.

National and Regional Policy Objectives. In Part 1 of the Plan, it states that various National Policy statements and National Environmental Standards have been noted, but they don't seem to be reflected in the Plan. The RMA requires Councils to protect outstanding natural features and landscapes from inappropriate subdivision, use and development and to protect areas of significant indigenous vegetation and significant habits of indigenous fauna. The plan does not have policies to do these effectively.

Decision sought: Amend the Plan to include policies to protect Outstanding Natural Landscapes and protect Significant Natural Areas. Use the definition of the Significant Natural Area from the RPS in the plan.

This should be reflected in the Strategic Directions, which need to show that the point of the Plan is to promote and enhance the health and well-being of the people and environment.

Ecosystems and Indigenous Biodiversity Objectives.

- ECO-O1. Need to add in 'and map'.
- ECO-O2 Subdivision is **not** appropriate within areas of significant indigenous vegetation and significant habitats of indigenous fauna. This objective should not be an objective in the ECO chapter, the obligation is to protect significant areas and maintain indigenous biodiversity.
- ECO-P1. The criteria in the West Coast Regional Policy statement should be applied to areas in the Grey District as well Buller and Westland Districts. Schedule 4 for Grey may not yet be complete. Although there is a finish time for Westland and Buller to complete the mapping by 2027, it is not clear how it will be progressed.
- ECO-P2. Poutini Ngāi Tahu cultural purpose is too broad a classification. No activity should be allowed in areas of significant indigenous vegetation or significant habitats of indigenous fauna unless there are **no** adverse effects on the significant indigenous vegetation or significant habitats of indigenous fauna.

Decision sought: Reword ECO-P2 so that clause e comes first and all other clauses are subordinate to it. Remove "more than minor" from clause e to read: The activity has no adverse effects on the significant indigenous vegetation or fauna habitat.

- ECO-P8. This needs to include “protect, maintain and enhance the indigenous habitats and ecosystems.”
- ECO-R1. Clearance outside of significant natural area as listed in Schedule 4 is a permitted activity – this relates only to the Grey District, and other areas of significant indigenous vegetation exist which are not listed in Schedule 4. This needs to be a discretionary activity, so that the indigenous vegetation can be assessed.
- ECO-R1. Windthrown timber should not be removed when it entails the destruction of indigenous vegetation, Remove 3.i.
- ECO-R1. 5. Clearance of 5ha of mānuka, kānuka and bracken over 3 years would stop any native forest from regeneration. All these 3 species form ideal nursery conditions for seeds and the areas should be left to regenerate naturally. The more “old-fashioned” view of these species is that they are scrub – that is untrue, they are valuable in their own right and as the initiators of regeneration of forests. These areas act as an important carbon sink and must be encouraged.
- ECO-R2. 2. This could lead to the loss of significant vegetation over a number of years and should not be a permitted activity.
- ECO- R2. 3. – *The indigenous vegetation clearance does not disturb, damage or destroy nesting areas or habitat of protected species.* It is unclear as to how this vegetation will be identified, and by whom. As it is a permitted activity it puts indigenous vegetation in the Coastal Environment at risk.
- ECO-R2. 4. This does not protect Significant Natural Areas in Westland and Buller.

Decision sought: The whole of ECO-R2 needs to be rewritten to properly protect indigenous vegetation in Grey, Westland and Buller Districts.

Coastal Environment.

The mapping of the Coastal Environment is inconsistent. It varies from a very narrow strip to a wide one, including some important coastal areas, and excluding others.

Decision sought: Amend the plan so that it is in agreement with the NZ Coastal Policy statement Policy 1, and reflect this in the maps.

Zones.

There are a number of inconsistencies here.

The Open Space and Recreation Zones include public conservation land (pcl). This is land which under the Conservation Act is protected for its natural values, but the Plan suggests otherwise, stating that the Open Space Zone (OSZ) areas are used predominantly for a range of passive and active leisure and recreational activities, along with limited associated

facilities and structures. Open Space Zones that are public conservation land should be rezoned as Natural Open Space Zones, and all should be renamed public conservation land to distinguish them from other types of open space land such as parks. There are Natural Open Space Zones within private ownership such as land parcels with QEII parcels on them, or under Council ownership for which the stated OSRZ policies are appropriate. (QEII covenanted land is not identified in the maps, even as Open Space Land).

Decision sought: Identify public conservation land in the maps, and ensure it all falls under the Natural Open Space Zone.

The Buller Coalfield Zone and Mineral extraction Zones should be removed. Mineral extraction can be authorised through discretionary resource consent in other zones such as rural and general rural. RURZ-05, GRUZ-R11, RLZ- R11, and even SETZ-R15 all allow for mineral prospecting and mineral exploration, and these are not in the mineral extraction zones. Any mineral prospecting, exploration and extraction should be subject to resource consent. All of these activities can have damaging effects on the land and neighbours and so should be subject to rules and regulations at the specific case level.

The zoning of large areas as Mineral Extraction Zone will be detrimental to those people who already own land in those areas. Land values will fall if a mine can be established in the neighbourhood – who wants to live in a mining area, with the noise, dust and disturbance that it entails? MINZ- R9 states that residential activities are non-complying, but the mineral zones are huge and will not necessarily be mined, thus stopping other types of development. Mineral extraction should not be favoured over other types of use and development of the land.

Decision Sought: Remove the Mineral extraction Zone and the Buller Coalfield Zone.

Min-04. To ensure that new subdivision, use and development does not compromise existing mineral extraction activities, including through reverse sensitivity to effects such as dust, noise and traffic generation

This objective in the strategic directions ignores the fact that often mining activities are started up in rural or small settlement zones, and they are the cause of the sensitivity issues. Eg on the outskirts of Hokitika there was extensive goldmining in the 1860s and very occasionally since. In the last 30 years there have been numerous sub-divisions established in these previously mined areas, but now the miners want to open up new gold mines, leading to depressed property prices as well as noise and dust, and, commonly, degraded sites when the miner leaves. This need to be stopped. The non-mining residents should have as many rights as the miners, and should not have their environmental and amenity rights abused.

Decision Sought: Do not prioritise mineral extraction over other uses. Recognise that coal mining is a sunset industry and should not be given preference over other land uses, including protection and conservation of the land.

Recognition of Climate Change.

No attempt has been made to ensure more carbon zero focussed business and building on the Coast. There is no recognition of the carbon sink potential of indigenous forestry and blue carbon sinks such as wetlands. There should be measures to encourage and support emissions reduction and decarbonisation. There seems to be no attempt to plan for managed retreat.

Specific areas.

The zoning for Hokitika assumes an extended sea wall has been erected – this has not even been granted resource consent yet and some argue that it will be contrary to the NZCPS. The overlays should show the danger of coastal flooding along the length of Beach Street and Revell Street. In comparison Golf Links Road is shown to be at danger of coastal tsunami, in the flood plain, in danger of flood and has a coastal hazard alert. Yet even here buildings will be allowed subject to resource consent. This is not appropriate for an area subject to such hazards - buildings, particularly residential buildings should not be allowed here. People should be encouraged to build on higher land, it is time to retreat from the coastal strip.

The National Adaptation Plan states that homes and infrastructure should be built away from harm. The TTPP Plan needs to reflect this.

There is a medium density residential zone planned for the seaside of Revell Street between Spencer Street and Hampden Street. This is not a logical place to put medium density housing, not only will it destroy the ambience of the area, it is in a flood zone. Building on the direct sea front should not be encouraged, this kind of development will need protection from the sea, which will cost the ratepayers of Hokitika a lot of money. Medium density housing would be more appropriate in other elevated parts of town, especially where there are wide streets and the development could be reflected in the opposite side of the road. Has the development along Revell Street been proposed because there are a number of older units along that stretch which could be demolished to allow a developer to proceed – ie is the proposal for monetary gain rather than sensible town planning?

Decision sought: Acknowledge the flooding potential in Hokitika, and stop building along the coastal strip. Be more proactive in encouraging managed retreat.



Clare Backes