

Submission on Te Tai o Poutini Proposed One Plan

Closing date 11 November 2022, at 2.00pm

Email: info@tppp.nz Attention: Proposed Te Tai o Poutini Plan, Submission

From: Katherine Gilbert, Ross, Westland

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Submitting as an Individual

I will not gain advantage in trade by this submission.

The provisions that my submission relates to a number of things in general, a few specifics are: Zones, Hazards and Risks, Natural Environment Values, Strategic Direction eg Mining and General matters etc.

I do not wish to present my submission at the hearing Check

I live in Westland, south of Ross having come to the Coast to work almost 50 years ago. I bought and developed a scrap of farmland and turned it into a lifestyle property with gardens and tree planting and built a small eco tourism business and a purpose built home on the site. One of the best things about the West Coast is the environment, but also the diversity of people who live and work together. It is the natural environment that is the Coast's best asset, one where future businesses will thrive with conservation, pest control, carbon sequestration, wind power, research and international investment. This plan needs to be looking ahead and incentivising gradual change in people's lifestyles so we can manage climate disruption in a long term and gradual manner. Instead this plan looks backwards so that a small number of people in one or two industries are intended to benefit while the vast majority will not.

A. Introduction and Overview

1. This is not a plan that has a focus on the future which means that it fails to achieve what it legally is required to do.
2. There is a very false justification for enabling mining in this plan and lack of recognition of the importance of Significant Natural Areas. It is saying that since there is such a large area of Public Conservation this means there is no need for further protection of indigenous vegetation including the setting aside of SNAs. I assert that SNAs do need to be assessed in the same way all across New Zealand, not differently on the West Coast. It's great that we have the nations remaining large areas of Conservation Land and the last remaining wetlands, Kahikatea forests and significant Coastal areas. These are assets and need protecting for their national and international significance, indigenous biodiversity and natural landscape values.
3. This plan is confusing, extremely long and complex which makes it very unfriendly. It needs to be rewritten so that it is easy to follow, logical and user friendly.
4. This plan was meant to be One Plan but it is effectively a massive One Document that includes all 4 different council plans. This isn't what was requested.

Relief sought:

- Rewrite the plan so it is shorter, simpler and meets the intent of the Local Government Reorganisation Scheme for the West Coast made in 2019
- Amend plan to ensure there is a rule framework that requires SNAs to be identified and mapped across the entire West Coast region, and for these areas to be listed in the plan, according to the West Coast Regional Policy Statement (RPS) Appendix 1 significance criteria.
- Amend plan to ensure there is a rule framework that protects the biodiversity of Significant Natural Areas that have not yet been identified and mapped in the Plan. Ensuring that such biodiversity has the same level of protection as the SNAs listed in Schedule Four

B. Mineral Extraction Zone

This is too permissive rather than being more controlled.

I object to all the Mining Extractive Zones allowing permitted activities and they should all be removed.

A special purpose zone for authorised/lawfully established mining activities is not necessary or appropriate. Managing the adverse effects of these activities should be consistent with the underlying/surrounding zone to ensure that adverse effects and remediation are appropriate. In addition, the zones proposed for the BCZ and the MINZ appear to capture areas that are not currently authorised for mineral extraction as well as areas where mining activities have not yet occurred.

I object to any mining on Public Conservation Land.

The zoning approach would override other natural character, landscape and biodiversity values that are to be protected as required by the RPS and other national directions as well as the RMA.

The ttp plan seems to ignore conservation values seeing them as non-existent throughout the region. The proposed approach risks further biodiversity loss in a major way.

The Buller Coalfield Zone to name the biggest area, and along with the Mineral Extraction Zone is far too permissive and I request these to be fully removed from the plan. The natural values in these areas are incredibly high and there needs to be a strong provision in the plan for qualified expertise from ecologists to assess the adverse effects on biodiversity

Relief Sought;

- Delete the Buller Coalfield Zone (BCZ) and the Mineral Extraction Zones (MINZ)
- Where BCZ and MINZ have been proposed on public conservation land (PCL) rezone this land in these areas as Natural Open Space (NOSZ) and in other areas as General Rural Zone (GRUZ) or as consistent with adjacent zoning where appropriate.
- Amend the plan provisions to ensure that indigenous biodiversity is maintained, and Significant Natural Areas (SNAs) are protected from new mineral prospecting, mineral extraction activities and ancillary activities.
- Ensure there is a requirement for an ecological assessment in accordance with the RPS significance criteria for all new mineral extraction activities.

C. Natural Open Space and Public Conservation Land identification

On the planning maps, Public Conservation Land (PCL) is not clearly distinguishable from other land, nor does it appear to have been consistently zoned in the One Plan.

PCL is held for conservation purposes, which is for the protection of natural intrinsic values by the Department of Conservation. The MINZ and the BCZ being placed over PCL appears to be a deliberate and dangerous error of judgement. It misleads the West Coast public about reality, land management and the law.

In the interest of integrated management, PCL should be clearly identified on the planning maps. PCL should be appropriately zoned according to its purpose which is consistent with the plan's Natural Open Space Zone (NOSZ).

Relief sought:

- Clearly identify public conservation land on planning maps, as a map layer selection option.
- Re-zone public conservation land to Natural Open Space Zone (NOSZ)

The definitions of these areas are unclear and not what the law requires.

Natural Open Space needs protecting by the Department of Conservation as Public Conservation Land. References to this are misleading about what is and what is not Public Conservation Land.

D. Coastal Environments and Coastal Hazard Zone

When you look at the maps there is largely no indication of where the Coastal Line actually is. This is not acceptable when the NZ Coastal Policy Statement is definitive on this, and provides clear guidance with the definition of where it needs to be. However this Policy is ignored or applied inconsistently in this plan. This must be addressed across the whole regional coastline.

Relief sought:

- Amend plan to comprehensively map the full extent of the Coastal Environment across the entire West Coast region.
- Incorporate the definition for Significant Natural Area from the RPS into the plan, and use this terminology consistently throughout the plan.
- Buller and Westland have not identified SNAs so the rules in these districts needs to be more restrictive over activities and their effects on the environment. If this doesn't happen then to maintain One Plan, Buller and Westland need to carry out an SNA identification process.

There is a serious issue with Revell Street in Hokitika. The stop bank ends at the beginning of the new Council subdivision zone planned area. The Coastal Hazard zone runs right up to Gold Links Road where there is a subdivision and new houses. Medium density housing should not be in Coastal Hazard areas.

An example of Natural Hazard is in Policy 1 of the NZ Coastal Policy Statement being about coastal processes impacting on the land, and there is an excellent list. But the TTPP One Plan has created only

very small coastal areas for protection. This is totally insufficient in protecting indigenous biodiversity and avoiding adverse effects on threatened species.

Relief sought:

- The Plan needs to incentivize where subdivisions should be so that adaptive and progressive moving of residential areas is away from Coastal Hazard zones.
- Natural Hazard Section statements need to turn into policy or rules otherwise it is just misleading. It must be made perfectly clear what is intended considering the future and climate disruption.

Please consider this submission carefully and act on the recommendations I have made. This has been a very time consuming and difficult exercise and I really want my considerations and recommendations implemented. Thank you.

Kathy Gilbert