

## Online submission

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

## Submission points

| Plan section                           | Provision | Support/oppose | Reasons  | Decision sought   |
|--|-----------|----------------|--|---|
| Hazardous Substances                   | NH - O3   | Oppose in part | As an example, it is understood the fuel station in Franz Josef is located very close to the alpine fault. In case of a seismic event, this is likely to result in direct and indirect health effects, cause material and environmental damage, obstruct rescue operations (leakage and hazardous vapours), as well as cause a loss of resilience when compared to a fuel storage located away from a major fault. Under NH-P6it is noted explained various types of activities should be avoided within certain distances from the Faultline, however this does not specifically state that existing activities with high risk (such as a fuel station) should be removed to outside the Faultline zone. Relocation of this fuel facility (and any similar other high-risk items) would be highly recommended and should in my view be included as a policy objective under the umbrella of resilience to natural hazards. A situation where in this example a fuel station / hazardous storage facility has been allowed in the past, likely based on an incomplete understanding of earthquake risks, should not be a reason for the regional council to allow this dangerous situation to continue.  | Regarding NH-03, it appears the approach taken by the council is to take the current status quo and define rules for any future changes. I am opposed to this approach, as it would leave the community still vulnerable to currently existing risks. |
| Ecosystems and Indigenous Biodiversity | ECO - P1  | Oppose         | Regarding the section ECO – P1, the TTPP proposes to not actively follow the requirements of the RMA delaying the mapping of Significant Natural Areas (SNAs) until a resource consent is required for such an area, for the period up to June 2027 when the mapping of SNAs should be completed in Westland and Buller. WCRC's position and timeline leaves the WCRC ratepayers exposed to the cost of any legal arguments between central government and WCRC about its interpretation of the RMA requirements. In my opinion any money should be spent on identification of significant natural areas (SNAs), and where relevant compensation to landowners, rather than be spent on the pursuit by WCRC of a very unlikely exemption from nation-wide RMA requirements. Furthermore, the 'general vegetation clearance rules' referred to on p.172 will provide a lower degree of environmental protection to areas with high ecological values than when being assessed as SNA. Simply speaking: a lot of valuable nature could be damaged or destroyed without requiring the trigger of a resource consent, therefore the proposed TTPP approach of delaying action until a resource consent is required does not take a cautious approach when protecting nature. | Identify and protect areas with high ecological values as SNA   |

|                       |            |                |   |   |
|-----------------------|------------|----------------|---|---|
| Noise                 | NOISE - R3 | Oppose         | <p>Unless a clear, no-cost step-by-step acoustic modelling approach is provided by the WCRC, the proposal will require new residential construction location, design and its surroundings (elevation, bunds etc.) to be assessed by an acoustic engineer. If the initial house design fails this test, it should be redesigned and re-assessed leading to further costs. The WCRC proposal does not contain any guidance if and how a typical NZ-style (timber framed, plastic wrapped, pink batt insulated, gib-lined, double glazed) house could meet the acoustic requirements. Would this be possible at 10m from a main road, or 40m distance? Should a full-height fence be installed (so noise bounces off to the neighbours across the road)? Should the cladding be brick, or is weatherboard as good? Should the glazing be triple, and should roofing be concrete tiles rather than steel longrun profiles? Are 90mm studs with insulation OK or should they be 140mm with thicker insulation?</p> <p>I believe this lack of guidance by WCRC would leave potential house owners and their builders rather frustrated. As it seems to be driven to avoid reverse sensitivity aspects on roading, would it not just be easier to drop a speed limit in areas where new housing is built adjacent to roads (as this means more vehicle traffic joining those main roads, but also more cyclists, pedestrians and pets?</p> <p>The section Noise-R4 also includes requirements on ventilation and temperature control, which are inappropriate, restrictive and expensive.. Why should one be required to install airconditioning when living close to a main road to keep an inside temperature between 18-25°C, and not if one happens to live in an urban centre with even more noise pollution?</p> | The proposed rules to limit exposure of residential housing occupants to transport noise are likely to cause a significant increase in consultant fees and construction cost for little benefit to future occupants, therefore I am opposed to this proposal.           |
| Buller Coalfield Zone | BCZ - O2   | Oppose in part | <p>This proposed objective ‘to ensure that exploration, extraction and processing of minerals within the BCZ – Buller Coalfield Zone minimises adverse effects on the environment, ....’ does not appear to take into account the effects of CO2 accumulation in the atmosphere, widely known as climate change. The continued normalisation of coal extraction, though historically and currently economically important in this region, should in my view not be carried on indefinitely in to the future by anchoring the extraction of coal into the TTPP.</p> <p>To truly minimise adverse effects on the environment, coal should be left in the ground and not extracted and transported to be burnt elsewhere. While proponents of continued coal extraction in the BCZ may point to its high quality and present-day use in steel processing, the need for coking coal in future will not be as high as it is now. At this point in time, technical alternatives have been developed to allow steel production without use of coal, such as a first plant in Sweden (developed by Hybrit in Sweden, refer <a href="https://www.ssab.com/fossil-free-steel">https://www.ssab.com/fossil-free-steel</a>) being set up to produce at a commercial scale in 2026.</p> <p>In my view, the consenting of any further coal extraction activities in the Buller Coalfield Zone should be assessed against the developments of such non-coal-based technology. Once such technology has sufficiently matured, no further exploration and extraction of coal should be permitted and the priority should be to prevent unnecessary carbon emissions by leaving coal in the ground.</p>   | <p>Include time limits for coal mining exploration (to end by 2025) and for coal excavation (to end by 2030). For both a clause could be included to delay those dates if alternative steel production methodologies have not yet matured in first-world economies.</p> |
| Buller Coalfield Zone | BCZ - P2   | Oppose         | <p>This proposed policy aims to facilitate future access to mineral deposits in the Buller Coalfield Zone, but in doing so it sets unspecified demands to future activities or developments. The policy does not state to which locations it refers, what would be considered as ‘compromised access’ and which time limit would apply. In the current regional economic conditions, it is understandable that access to the BCZ is highly valued by some stakeholders, however this should not mean that this situation should be incorporated in the TTPP as expected to continue forever (see my comments on BCZ-O2 above). In my opinion it would be reasonable to expect of a regional plan that it clearly defines limitations to the desired access; these limitations should define the location, duration and quality of access sought, allowing other activities and developments to occur without risk of being struck out by the currently proposed wording of policy BCZ-P2. With respect to duration, I would propose a reasonable limit be used (say: until 31-12-2030) which could be reassessed with each future update of the TTPP.</p>   | Adjust clause so it allows a balance between the interests of those involved in the development of mineral deposits, other users of those areas, and nature.  |

## Documents included with submission

None