

NOTES FOR HEARING

NATURAL LANDSCAPES AND FEATURES

Frida Inta S553 Buller Conservation Group S552

19 March 2024

Representing myself and Buller Conservation Group, I have read the s42A report of Lois Easton, the S42A Addendum of Bridget Gilbert, and Bridget's landscape report.
(red font are my requested amendments)

Natural Features and landscapes

Landscape Report January 2024

3.43 This means that in some circumstances, it can be appropriate to include reasonably 'high-level' ONL Schedules in a Plan and leave the more nuanced landscape detail to be determined as part of an application-specific landscape assessment

BCG p27 F Inta p30 TTPP p179

Overview

s42A@72

I object to amendment 1 by Westpower Limited (S547279, S547.0507). there is already reference to electricity infrastructure in the overview. This addition makes it heavily biased towards electricity considerations.

P1

S42A@101 S552, S553.081

- P1(a) Bathurst Resources (S491.021) I fail to understand how mineral extraction is protecting NFLs from inappropriate development. **Mineral extraction needs to be deleted.** This is elaborated on in R10A, where 10A acknowledges that mineral extraction can be damaging to landscape and natural features.
- Amendment (f)/(g), regarding regional electricity supply - needs to be combined into one clause.
- Deleted (g) Requiring a 'functional need to be in an ONFL is an important inclusion in this policy, and needs to be retained and placed in (f)/(g) instead of deleted.

P2

S42A@135, S552.213, S553.217 *avoid significant adverse effects on the values that contribute to outstanding natural landscapes described in Schedule Five and outstanding natural features described in Schedule Six. Where adverse effects cannot be avoided, ensure that the adverse effects are otherwise minimised, remedied, or mitigated*

The amendments to P2 say that BCG contributed to them. The amendments are nothing like what BCG recommended. P2 also breaches the WC-RPS Chapter 7B Natural Features and Landscapes, Policy 4, where it says:

*Allow activities in outstanding natural features and outstanding natural landscapes which have **no more than minor** adverse effects.*

Avoiding significant adverse effects is much more lenient than allowing activities which have no more than minor adverse effects; there are a range of adverse effects that can occur between minor and significant adverse effects, and such effects have not been allowed for by the WC-RPS, nor has offsetting and compensation, which invariably relates to significant adverse effects.

P5

...consider the following matters;

1. effects on natural character, amenity, recreation, history and biodiversity

Grammar: could insert 'Adverse' at beginning of clause, but maybe there will be positive effects of the listed values.

R6

3(b) allows 500m³ of earthworks per site per annum - that's 10 x 50 m x1m depth. This could be the equivalent of a 50 metre length of 2 lane road and would be a large scar on the landscape. Within 4 years it could be 200 metres long. The permissible amount of earthworks needs to be smaller in an ONFL otherwise the ONFL will be subjected to cumulative degradation over time.

I also have concerns with the word, 'site'. 'Title' would be more appropriate, as site has a number of meanings and is a vague term in relation to these rules.

3(b) also needs to say, 'per title or 4ha (4ha is used as a sub-division standard elsewhere in this plan) whichever is the larger.'

R12

3(k) I fail to see how discretion will be restricted to '*positive effects*'.

Aren't restrictions on restricted discretionary activities meant to address effects that could affect the environment adversely and thus set conditions accordingly? Why would any positive effect be restricted and need conditions set for it?

(k) is a nonsensical inclusion.

17.2 of the WCLWP says:

Restricted discretionary activity: Resource consent required

These activities require a resource consent, and the Council has discretion to grant or decline consent. Council has limited the range of matters it considers to those listed in the rule and may only set conditions (if consent is granted) on those matters. The consent

o

f

t

e

n

d

o

e

s

n

o

t