

Te Tai o Poutini Plan Introductory Planning Statement Ecosystems and Biodiversity



Te Tai o Poutini
PLAN
A combined district plan for the West Coast

Introduction to the Ecosystems and Biodiversity Topic

1. Tēnā koutou. My name is Lois Margaret Easton. I have been the principal planner during the period of development of Te Tai o Poutini Plan. I have been the lead planner for the ecosystems and biodiversity topic. My credentials are outlined in the relevant s42A reports and I will not repeat these here.
2. Firstly I would like to provide some general context around the ecosystems and biodiversity values on the West Coast.
3. The West Coast/Te Tai o Poutini contains a significant amount of intact natural biodiversity by comparison with most other parts of New Zealand. Continuous tracts of lowland and coastal forests and freshwater and coastal wetlands cover large areas. In many places indigenous ecosystems and habitats extend unbroken from the mountains to the sea. 84% of the land area is under the management of the Department of Conservation. In total an estimated 87% of the West Coast/Te Tai o Poutini is covered in indigenous vegetation - compared with 24% nationally.
4. While the West Coast/Te Tai o Poutini is fortunate to have a wide range of diverse and intact ecosystems and vegetation types, there are some ecosystems and vegetation types not well represented in the protected areas network. These are generally ecosystems found in the lowland areas of the West Coast/Te Tai o Poutini. Alongside this, parts of the West Coast/Te Tai o Poutini include the last habitats or strongholds of some native species threatened with extinction.
5. While generally within New Zealand there are a large number of ecosystem types and land environments that have been reduced to levels where they are threatened, on the West Coast there are fewer types of land environments that fall into this category. As a result of this, a key focus during Plan development was the protection of those land environments which are threatened.
6. The Threatened Environments of New Zealand Classification produced by Landcare Research in 2012 identifies that at Karamea in the Buller District there are two land environments where only 10-20% of the indigenous cover remains. These land environments are regarded as Chronically Threatened. There are a further five types of land environments where only 20-30% of the indigenous cover remains. These land environments are regarded as At Risk and can be found in a range of locations across the West Coast/Te Tai o Poutini. Alongside this there are three land environments where less than 30% indigenous cover remains and are also regarded as Threatened nationally and Critically under protected. There is also one further land environment which is At Risk nationally and under protected. These land environments are also found at Karamea in the Buller District.

Operative Plans

7. Turning to the Operative Plans, this topic is one of the topics within Te Tai o Poutini Plan where there are quite different approaches taken across the operative plans.
8. The Buller and Westland District Plans take a "general vegetation clearance" approach. These reflect that a process of identifying specific areas of significant indigenous vegetation and fauna habitat has not been undertaken, although the plans both contain policies outlining criteria and a process for identifying these areas which was not implemented. .
9. In the Grey District, a process of Significant Natural Area (SNA) identification has been undertaken. 37 sites in the Grey District have been identified through initially desk-top studies and then ground truthing and ecological assessment as meeting the threshold as being significant. The way in which the Operative Grey District Plan works, means that these SNAs are subject to specific rules, and all other indigenous vegetation clearance in the district, outside of riparian areas and some specific scheduled outstanding natural landscape areas, is a Permitted Activity.

Development of TTPP Provisions

10. The provisions in the Ecosystems and Biodiversity Chapter were developed to implement the requirements of the RMA and the West Coast Regional Policy Statement.
11. The WCRPS became operative in July 2020 and includes Chapter 7 Ecosystems and Indigenous Biodiversity that sets out the regional intention to manage biodiversity values and maintain the good health and extent of ecosystems and indigenous biodiversity on the West Coast/Te Tai o Poutini. Te Tai o Poutini Plan must give effect to the WCRPS.
12. Policy 7.1 of the WCRPS sets out the means of identifying significance and links to the criteria to be applied in identifying areas of significant biodiversity across the region.
13. Policy 7.1 recognises that using regionally consistent criteria for determining and identifying Significant Natural Areas (SNAs) assists with achieving sustainable management. At that time it was considered best practice to map SNAs in plans, so that when a subdivision, use or development proposal is put forward, robust decisions can be made regarding its appropriateness.
14. As part of the process of developing the West Coast Regional Land and Water Plan, significant wetlands were mapped and identified in that plan. The WCRPS recognises that these significant wetlands are also SNAs.
15. As is discussed in my s42A report, the NPSIB contains different criteria for the identification of SNAs, than those in the WCRPS. While the NPSIB was not in effect when the TTPP was drafted, the TTPP Committee was concerned to not embark on a process of SNA assessment until the criteria were agreed upon.
16. Due to ongoing delays in the finalisation of the NPSIB, this meant that an SNA identification process was not undertaken prior to the notification of TTPP. Instead Policy ECO – P1 was included in the Plan, setting out the timeframes and process for doing this work.
17. Policy 7.2 of the WCRPS relates to activities and their effects on areas of significant indigenous biodiversity. It recognises, that with the exception of some specific threatened land environments (discussed above) and some threatened species, biodiversity is widespread on the West Coast/Te Tai o Poutini and that the focus of management of activities on biodiversity should be on those aspects that are identified to be of particular importance.
18. Policies 7.3, 7.4 and 7.5 of the WCRPS relate to the effects management hierarchy, biodiversity offsetting and biodiversity compensation, which are also considered appropriate within a West Coast/Te Tai o Poutini context.
19. Policy 7.6 relates to subdivision, use and development within SNAs and states that this should be allowed for in relation to lawfully established activities and activities with no more than minor adverse effects.
20. Of significant note in the WCRPS is Policy 7.9 which provides for both the kaitiakitanga role of Poutini Ngāi Tahu, and importantly provides for Poutini Ngāi Tahu uses such as papakāinga, cultural harvest, mahinga kai and customary uses
21. In relation to indigenous biodiversity in the coastal environment, section 9 of the WCRPS deals with that aspect, and is strongly protective.

General Issues Raised by Stakeholders while Developing the Plan

22. The issues relating to vegetation, ecosystems and indigenous biodiversity cover a range of matters, but particularly relate to the identification and management of areas identified as having

significance under section 6 of the RMA and the protection of indigenous biodiversity outside those areas identified as being significant.

23. Vegetation, ecosystems and biodiversity matters are broad and varied and are of interest to a range of parties. Some submitters place a very strong emphasis on ensuring protection of biodiversity values. Other submitters highlight that the protection of indigenous biodiversity provides benefits to the environment and the community but can come at a cost for landowners.
24. In many cases areas of significant indigenous biodiversity value remain because of the choices made by landowners in managing their properties. Across the West Coast/Te Tai o Poutini there has been significant debate over the issue, with only the Grey District progressing the identification of specific SNAs.

Identifying SNAs

25. In determining an approach to ecosystems and indigenous biodiversity on the West Coast/Te Tai o Poutini, the TTPP Committee commissioned a desk top study by Wildlands Consultants, looking at what vegetation on the West Coast/Te Tai o Poutini might meet significance criteria. This report identified that at a desktop level, the overwhelming majority of indigenous vegetation on the West Coast/Te Tai o Poutini could meet the criteria. Largely due to the poor level of detailed desktop information, but also the low quality of aerial photography available for the study, field assessment and detailed studies of individual sites is needed to determine which sites are significant. Essentially at a desk top level all sites were considered potentially significant.
26. A preliminary field assessment by TTPP staff of a selection of sites quickly identified that large areas of gorse and non-native vegetation have been caught in the "potentially significant" areas. This confirmed that preliminary ground assessment was needed to exclude obvious non-significant sites, and that detailed ecological assessment would be needed to have any confidence in a SNA identification.
27. The Committee therefore decided that, in light of the uncertainty and substantial costs involved, continuing the approach of "general indigenous vegetation clearance" provisions for Buller and Westland, was most appropriate for inclusion in the proposed TTPP – effectively updating the existing provisions.
28. It did however include a policy which set a date by which the SNA field assessment for these districts would be completed and that a Plan Change would be introduced to include the identified SNAs in the TTPP.
29. Because of the large amount of vegetation needing to be assessed through such a process – and the significant financial costs of doing the work, the policy is that the field assessment and Plan Change will be completed by June 2027.
30. Because the Grey District Council had already completed the process of identifying SNA areas, the approach in TTPP is an update of the existing provisions for that district also. The 37 identified SNAs are scheduled in the proposed TTPP and mapped on the planning maps as an overlay.

Outstanding Natural Landscapes and the Coastal Environment

31. Across all three districts there are also very substantial areas identified as Outstanding Natural Landscapes as well as a significant area within the Coastal Environment. The identification of these is discussed further in the Landscapes and Natural Features and Coastal Environments s42A reports.
32. Provisions around vegetation clearance of these areas is included within the Ecosystems and Biodiversity chapter of TTPP. In recognition of the combined ecological and landscape values of

Outstanding Natural Landscape areas, more stringent indigenous vegetation clearance provisions for these locations, comparable to the SNA provisions, are included in the proposed Plan.

33. Since the TTPP was notified, the NPSIB has come into effect and within the scope of submissions, As outlined in the s42A report I have attempted to make recommendations to changes to the Plan which will implement this as required.
34. I now turn to the written evidence provided ahead of this hearing.
35. Ngāi Tahu have provided detailed written evidence. I do wish to hear the presentation from this submitter.
36. I do however note that a key matter raised the Ngāi Tahu evidence is that there are areas not identified in the TTPP as Māori Purpose Zone, and that Ngāi Tahu seek these areas be rezoned to Māori Purpose Zone. These lands were not identified in any submission from Ngāi Tahu. While a list of properties has been provided to me by Ngāi Tahu, I do not have mapped information on their location, or the reasons why they should be identified as Māori Purpose Zone and I have not recommended rezoning them.
37. I will therefore need to carefully consider this evidence within that context as well as considering scope of the original submission.
38. Ngai Tahu have sought to widen my proposed definition of Specified Māori Land to all land owned and managed by Ngāi Tahu. I consider this relates to the matters outlined above as it would substantially expand the lands to which the more permissive provisions apply, well beyond what I understood was intended within the provisions in the notified plan which were specific to the Māori Purpose Zone lands.
39. In particular many of these additional lands are not owned by the two West Coast rūnanga or their members, but include a range of commercial, forestry and redress lands that are owned by Te Rūnanga o Ngāi Tahu.
40. I had hoped to meet with Ngāi Tahu to discuss these matters ahead of this hearing, but this was not possible. I would like to respond carefully and in some detail to the written evidence and any evidence presented at the hearing in my Right of Reply.
41. In relation to the evidence of Manawa Energy and Stephanie Styles, and that of Pauline Whitney from Transpower I note that regardless of any exclusion from the NPSIB, that renewable electricity generation, electricity transmission and distribution and the National Grid are required to meet the requirements of Section 6 of the RMA, as well as the West Coast Regional Policy Statement, and in the coastal environment, the New Zealand Coastal Policy Statement.
42. I note that these submitters will be presenting their submissions at the hearing and I would like to hear their evidence before making any response to the detail of their submissions.
43. At this point there are no other specific matters where I would alter my recommendations in relation to the s42A report.
44. Thank you