

Further Submitter #145

Online Further Submission

Further Submitters Name	Bay Bush Action
Further Submitter Number	FS145
Wish to be heard	Yes
FS qualifier	a person representing a relevant aspect of the public interest (e.g. community group)
FS qualifier reason	Bay Bush Action is a community pest control group with a Department of Conservation management agreement for almost 2000 hectares of the Opuia Conservation Area to manage pests including rats, possum, stoats and feral cats for the restoration of the forest to allow biodiversity to flourish. We have an interest in ensuring that the opportunities to restore indigenous forest and wetlands are maintained in order to provide habitats for threatened species to thrive.
Joint presentation	Yes
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Online further submitter?	Yes
Date raw FS lodged	03/09/2023 6:07pm

FS145.01 - 145.03

Further submission points

Raw FS number	Original submitter	Related Submission Point	Plan section	Provision	OS Decision Requested	Support/Oppose	FS Decision requested	Reasons
FS145.1	Ventia Ltd	S424.001	Planning maps	Mineral Extraction	Amend the extent of the Mineral Extraction Overlay over the entire area of NA97B/387.	Oppose	Disallow	

Bay Bush Action opposes the expansion of the mineral overlay, primarily for the impact it will have on the habitat and taonga species that live there, focusing in particular on the areas of native forest and the adjacent wetland that feeds an underwater

native forest and the adjacent wetland that feeds an under water stream.

Historically this entire area would have been lowland forest, and the habitual 'biting away' of remnant forest is a threat that keeps our native forest cover at the extinction threshold. Between 2001 and 2022, Northland had tree cover loss of 148kha. It is third in the regions that have experienced the most forest loss, with only Waikato and Bay of Plenty losing more tree in a 20 year period. And most of that loss occurred in the Far North District – a whopping 84kha (when the average for a district is tree loss of 49.3 kha). More information here: <https://www.globalforestwatch.org/dashboards/country/NZL/11?category=undefined>

But why is the forest, or bush, so important? These forests are home to an incredible array of biodiversity, which has inherent value and should be protected for its own sake.

Also, increasingly, these native forests are being recognised for their role as carbon sinks:

"Forests sequester carbon by capturing carbon dioxide from the atmosphere and transforming it into biomass through photosynthesis. Sequestered carbon is then accumulated in the form of biomass, deadwood, litter and in forest soils. Release of carbon from forest ecosystems results from natural processes (respiration and oxidation) as well as deliberate or unintended results of human activities (i.e. harvesting, fires, deforestation)." <https://unece.org/forests/carbon-sinks-and-sequestration>

Given the climate challenges we face, preserving the remaining areas that actually help manage our total national carbon emissions must be seen as a priority. Condoning destruction of forest cover for one-off extraction (for a product that actually supports carbon emitting vehicles) works against what is in the best interests of our people.

Meanwhile, the wetland has its own unique and possesses critical 'connecting' value as an ecosystem. The Ministry for the Environment's state of the environment report Environment Aotearoa 2022 says:

"Wetlands (repo) are an integral part of environmental and cultural landscapes. Repo act like giant filters, with the ability to remove nutrients and sediment from water. As well as protecting from extreme events like floods or storms, repo, especially peatlands, store large amounts of carbon that could be released if drained or disturbed (Ausseil et al, 2015; The Ramsar Convention on Wetlands, 2019).

The ability of wetlands and estuaries to trap sediment and filter out pollutants before they reach the ocean are among the many benefits of wetland protection and restoration (NIWA, 2007).

Repo cover less than one percent of the land area of Aotearoa,

yet they provide a habitat for two thirds of our threatened freshwater and estuarine fish species and 13 percent of threatened plant species. Wetlands are also vital for the survival of many of our native bird species, including the Australasian bittern (matuku), brown teal, New Zealand fernbird (mātātā), marsh crake (koitareke), and white heron (kotuku), who rely entirely on remnant wetlands (Clarkson et al, 2013; DOC, nd-c). They are a crucial source of mahinga kai, as the breeding grounds for tuna, inanga, and other culturally important fish species (Clarkson et al, 2013). Repo are also a source of plants for medicinal use (rongoā), plants for use in weaving (raranga), and construction materials for houses (whare) (Taura et al, 2017).

More than simply a supplier of food and materials, repo are an important part of the cultural landscape. They are deeply embedded in cultural life, as reservoirs of mātauranga Māori and places of deep historical, economic, and spiritual significance (Taura et al, 2021). If repo continue to be lost, cultural indicators that have been founded on generations of mātauranga Māori, such as those relating to watercress (kōwhitiwhiti), the giant spike sedge (kuta), and harakeke, will also be lost, along with the ability to interact with these places.”

Zoning in on a more direct, local understanding of the area, Bay Bush Action trustee, Brad Windust, provided an ecological report for a property adjacent to the area that is proposed to fall into the mineral overlay. Brad describes this “large block of forest on the western tail of the Opuā [Conservation Area]” as “an amazing asset to have as conservation for the indigenous wildlife of the Bay of Islands. It is a remarkably diverse subtropical northern rain forest with a mix of volcanic and clay soils.”

“While there’s some regenerating forest, most is ancient with two rock creeks cascading down to a very special wetland at the base of the forest, which is worthy of protection... Even in the severe drought of 2020 both creeks were running. The wetland is an important habitat for kiwi in summer and likely a life-saver for them in droughts. It’s also an excellent habitat for the critically endangered bittern, native fish, mioweka, fern bird and spotless crake.”

There are numerous other social, economic, cultural and archaeological factors that we could draw on to argue against the expansion of the mineral overlay. However, Bay Bush Action’s primary focus is to oppose the submission from an environmental, climate and wellbeing standpoint, based on the belief that any further exploitation of this area would utterly destroy this precious habitat and perpetuate the march to wipe out remnant forest and wetland for economic gain until no indigenous biodiversity remains in our district, our region, our country.

FS145.3	Ventia Ltd	S424.002	Mineral	Rules	Insert further clarity in terms of	Support in part	Disallow in part	Based on Bay Bush Action’s submission on point s424.001, we
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extraction
overlay

what overlays takes precedence
when multiple apply.

agree that further clarity is required in relation which overlay takes precedence in an area with multiple overlays. However, we assert that the mineral extraction overlay should never take precedence over outstanding natural features and landscapes per part 2 District Wide Matters, Natural Environmental Value, NFL-P7: "Prohibit land use that would result in any loss of and/or destruction of the characteristics and qualities of ONL and ONF." NFL-R8 states that mineral extraction is prohibited in such areas. As such the extension to the mineral overlay across the forest and wetland area should be disallowed.