

Forest & Bird Notes for BOPRC RCA Te Puna Business Park RM22-0010 verbal submission

Date of hearing: 10 July 2024

Bay of Plenty Regional Conservation Manager: Dr Chantal Pagel

Tena koutou katoa,

Ko Chantal Pagel toku ingoa

No Tiamana oku tipuna

He kaimahi ahau mō Te Reo o Te Taiao

My name is Chantal Pagel. I am the Regional Conservation Manager for the Royal Forest and Bird Protection Society of New Zealand Incorporated (Forest & Bird)

Today I am speaking on behalf of Forest & Bird and our branches here in the Western Bay of Plenty in relation to our submission on the Resource Consent Application for Te Puna Business Park.

In our initial submission, Forest & Bird opposed the grant for industrial activities at 297 Te Puna Station Road as they were deemed having a negative impact on the surrounding environment, especially freshwater, sharing concerns with many other submitters.

Freshwater quality in Aotearoa New Zealand is in a dire state: 95 to 99% of river length in urban, pastoral, and exotic forest areas exceeds water quality guidelines, 90% of our wetlands have been drained, and 76% of our native fish (including longfin eels and many whitebait species) are threatened with or atrisk of extinction.

During previous freshwater surveys Longfin and Shortfin Eel, koura (freshwater crayfish), kākahi (freshwater mussels), inanga, redfin bully and giant kokopu were identified in the Hakao stream - highlighting just how precious this waterway is.

We appreciate the additional evidence provided for this Resource Consent Application and the provision of the s42 report. However, there are still information gaps and this we see of great concern.

We support Council's condition for the applicant to provide a stormwater management plan, particularly to ensure hazardous substances aren't entering the adjacent waterways, leading to further deterioration. Hakao stream exhibits good to excellent water quality and we want this to continue for future generations. We want to remind council to prioritise health and wellbeing of freshwater under Te Mana o te Wai.

Also, soft alluvial soil and its disturbance can cause erosion and a significant influx of sedimentation, smothering riverine ecosystems. This means they become inhabitable for freshwater species that rely on pebbles or gravel or organic substrate such as moss or wood to survive. Due to climate change,

extreme weather events will become more frequent increasing the likelihood of sediment run-off and surface flooding. We therefore support the implementation of a detailed Earthworks and Construction Management Plan as condition of consent, and with an outline on how erosion and sediment controls will comply with Council's ESC Guidelines.

We further welcome the plan to re-establish part of the historic wetland in the lower terrace of the development site and the condition to provide a Wetland Planting Plan in liaison with Pirirākau. Wetland restoration is an important step towards improving wildlife outcomes, improving community amenity, store carbon, and increase resilience to extreme weather.

However, we want to note that these benefits are only given if the wetland is appropriately managed. Active pest plant and animal control needs to be part of the Wetland Planting Plan. Further, we want to highlight that, at least when it comes to wetlands – bigger is better. The 1.8ha of proposed wetland include two stormwater treatment facilities. We are not convinced this area, while being a net benefit to local flora and fauna, will be sufficient to mitigate future flood flow.

We note that a majority of the proposed area, and the proposed workshop, are located within the floodplain. Such floodplains are excellent opportunities to be restored into functional wetland. But they are fairly inappropriate for any residential or industrial development and we want to urge Council to refrain from any consenting approval in low-lying, flood-prone areas as climate change mitigation is not only about how we build, but where we build.

Forest & Bird also supports the protection of identified sites and objects of significant cultural and natural heritage value to tangata whenua and acknowledge their role as kaitiaki of our whenua, our water and taonga species.

On behalf of our local branches, we thank you for your time.

Kia ora.