

New Zealand Speleological Society Further Submission to the Waitomo District Council on
the Proposed District Plan Submission of Graymont (NZ) Limited

To: Waitomo District Council

Email: districtplan@waitomo.govt.nz

Name of Submitter: New Zealand Speleological Society (NZSS)

NZSS cannot gain an advantage in trade competition through this submission.

NZSS does wish to be heard in support of this submission.

If others make a similar submission, NZSS will consider presenting a joint case with them at a hearing.

Address for service:

Attention: David Ellacott (NZSS Secretary)

Email: nzss-secretary@caves.org.nz

Phone: 021 761 119

Dated: July 13, 2023

The reasons for my opposition are;

Graymont (NZ) Limited’s proposed amendments have significant implications for the conservation of cave and karst environments.

Graymont’s proposed amendments in part seek to allow mitigation or remediation of environmental impacts on cave and karst landscapes because of Graymont’s regional economic significance.

The NZSS opposes allowing mitigation or remediation (instead of avoidance) as an appropriate protection measure due to the fragility and complexity of the cave and karst landscape and associated ecology. Further to this, the NZSS opposes the continuation of rural production zone development because of the existing usage. Rural production zone development should not take precedence over the objective of protecting cave and karst landscapes.

The protections for the cave and karst environments in the PDP have been developed with the assistance of NZSS members over a number of decades with a focus on avoiding environmental impacts because of the often permanent impacts that have occurred historically to caves and karst drainage. For example, despite extensive efforts to repair The Waitomo Catchment through revegetating slopes and riparian planting, very limited improvements have been made to water quality and freshwater ecology.

These cave and karst systems are significant not only for their geological and ecological value but also because of their importance as part of the freshwater catchment systems, catchments which provide for the physical and spiritual wellbeing of the people of Waitomo. The damage of these catchments, especially where the impact may be unknown due to the complexity of the underground systems, risks the degradation of the catchments of the Waipā River. This does not uphold the purpose of Te Ture Whaimana o Te Awa o Waikato – the Vision and Strategy for the Waikato River.

I seek that these parts of the original submission be disallowed;

SD-05	Oppose
NFL-P1	Oppose
NFL-P4	Oppose
NFL-P5	Oppose
NFL-16	Oppose
NFL-R17	Amendment- Oppose New Rule- Oppose We understand the complexities of karst landscapes present in these zones, and that there can be a case for fencing and vegetation clearance within 20m of a cave or

	sinkhole, but there are also some that would be best protected with a greater than 20m radius. This requires an assessment of catchment size, slope gradient, vegetation and soil structure. Without the development of these detailed assessment criteria we oppose the proposed new rule.
ECO-P5	Oppose
ECO-P13	Oppose
NATC-P1	Oppose
NATC-P2	Oppose
GRUZ-P12	Oppose
GRUZ-P15	Oppose
RPROZ-P3	Oppose

I am a person who has interest in the proposal that is greater than the interest that the general public has. (specify on what grounds you come within this category);

The New Zealand Speleological Society (NZSS) is the national organising body for speleology (caving) in New Zealand. We promote recreational caving, the exploration of caves, science and conservation of caves as well as the karst or lava landscapes they are formed within. The membership is mainly made up of members of affiliated local clubs. The NZSS also operates NZ Cave Search and Rescue on behalf of Land Search and Rescue. NZSS is a proud member of the International Union of Speleology and the Australasian Cave and Karst Management Association. NZSS additionally engages regularly with the Department of Conservation and local government on cave and karst matters.

The NZSS believe it has the right to a further submission on the Waitomo District Proposed District Plan (PDP) under Schedule 1 Section 8(1)(a) and 8(1)(b) of the Resource Management Act 1991 as the NZSS represents the public interest in protecting the karst landscape as well as having an interest in the PDP greater than the interest that the general public has in respect to cave and karst landscapes and ecology in Waitomo District. The reasons for this being as follows:

- Established in 1949, the NZSS has a long history of protecting the recreational and environmental interests of caves and karst in the Waitomo District and around New Zealand. NZSS cave surveying, research and hydrology investigations have contributed significantly to the understanding of cave networks, subterranean ecosystems and karst hydrology in the Waitomo District and New Zealand. Members of the NZSS have been instrumental in advising both Regional and District Councils in mapping significant karst areas and identifying karst ecosystem sites, providing baseline data for identifying SNAs, ONFs and Karst Overlays for planning purposes.

- The NZSS provided the original information that is included in Schedule 12 of the PDP.
- NZSS members have regularly engaged and assisted others in their activities in order to encourage better understanding of karst and lava systems and the impacts that their activities can have on them. These others include mineral extraction, roading, construction, tourism/outdoor education, farming, forestry and waterway management.
- NZSS actively engages with national and international scientists and affiliated organisations to research subterranean biodiversity, ecosystems and conservation management strategies.