



Federated Farmers of New Zealand

Further Submission on Te Tai o Poutini Plan | One Plan

17 July 2023



FURTHER SUBMISSION TO WEST COAST REGIONAL COUNCIL ON THE TE TAI O POUTINI PLAN | ONE PLAN

Form 6

Further submission in support of, or in opposition to, submission on publicly notified proposed policy statement or plan

Clause 8 of First Schedule, Resource Management Act 1991

To: *West Coast Regional
Council, One Plan
Committee*

E: info@tppp.nz

Name of further submitter: West Coast Federated Farmers of New Zealand

Submission by: **BEDE O'CONNOR**

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A copy of our further submission will be served on the original submitter(s) within five working days after making the further submission to the local authority.

This further submission in support of, and opposition to, submissions on the following proposed Te Tai o Poutini Plan | One Plan as proposed by The West Coast Regional Council. Where Federated Farmers submitted on the same point as any other submitter it stands by its original submission. This Further Submission seeks only to provide West Coast Federated Farmers views on points raised by other submitters that are not already covered in our submission.

Federated Farmers is:

- *An organisation representing a relevant aspect of the public interest;*
- *An organisation which has an interest in the proposal that is greater than the interest the general public has.*

Grounds for further submission:

Federated Farmers of New Zealand is a representative body for farmers, so both represents a relevant aspect of the public interest and has an interest in the proposal that is greater than the interest that the general public has.

Federated Farmers supports or opposes the submissions of: Submitters stated in the table attached to this further submission.

The particular parts of the submissions Federated Farmers supports or opposes are: Variously stated with respect to respective submitters in the table attached to this further submission.

The reasons for our support or opposition are: Variously stated with respect to respective submitters in the table attached to this further submission.

We seek that the whole or part of the submissions be accepted or rejected: As variously stated with respect to respective submitters in the table attached to this further submission.

Federated Farmers wishes to be heard in support of its further submission. If others make a similar submission, we will consider presenting a joint case with them at a hearing.

We acknowledge that by taking part in this public submission process the submission (including names and addresses) will be made public.

Where Federated Farmers submitted on the same submission point as any other submitter it stands by its original submission.

This Further Submission provides Federated Farmers' views on points raised by other submitters.

Sub Point.	Submitter Name	Provision	Original submission decision requested	Further submission Support/ Oppose	Further Support Reasons	Decision Sought
Whole Plan						
S402.001	Shaun and Carissa du Plessis (S402)	Whole Plan	Asks for the structure of the plan to be amended to ensure that it makes it easier to understand. Fix the issues with E-maps and grammar.	Support	This supports Federated Farmers submission.	Allow
S273.001	G.T FARMS LTD (S273)	Whole Plan	Affects the day-to-day farming operations of the Valuation numbers as following - 2574018400, 2574041600, 2574041900, 2574018100, 2574041700 (355 Old Christchurch Road -TBC).	Support	This supports Federated Farmers submission.	Allow
S483.001	Scenic Hotel Group (S483)	Whole Plan	Seeks that there is a lot of information to absorb across the plan and the need for deeper engagement across the whole plan.	Support	This supports Federated Farmers submission.	Allow
S483.009	Scenic Hotel Group (S483)	Whole Plan	Plans does not allow people to protect their properties quickly and land where gradual effects occur.	Support	This supports Federated Farmers submission.	Allow
S484.001	Development West Coast (S484)	Whole Plan	Gives effect to use of the RPS to guide the One Plan to follow what has already been set to how they draft the	Support	This supports Federated Farmers submission.	Allow

			proposed policy.			
S488.038	West Coast Regional Council (S488)	Whole Plan	Concerns raised regarding Section 2 of the RMA, especially the cultural, social and economic wellbeing for health and safety.	Support in part	This supports Federated Farmers submission.	Allow
S484.002	West Coast Regional Council (S488)	Whole Plan	Advocates that the One Plan does not affect the economic growth of the district as set out in Section 32 of the RMA.	Support	This supports Federated Farmers submission.	Allow
S550.001	Westland Farm Services (S550)	Whole Plan	Inconsistent with the proposed agricultural service activity in the rural environment. This needs to be addressed.	Support	This supports Federated Farmers submission.	Allow
S521.019	Aggregate and Quarry Association (S521)	Whole Plan	Raises issues around access to a consenting pathway remains including with the ability to mitigate, offset and compensate. Asks for amendments where there is inconsistency in overlays.	Support	This supports Federated Farmers submission.	Allow
S547.003	Westpower Limited (S547)	Whole Plan	Raises concerns that the proposed plan is not in conjunction with the West Coast Regional Policy Statement as following "ensure that Policy 2, Chapter 4 - Resilient and Sustainable Communities, is given effect".	Support	It is important that operative Regional Policy Statements are followed by all plans written in the region, following the consistency of the RPS and supports positions taken in our submission. This Supports Federated Farmers Submission.	Allow

S560.011	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	Whole Plan	Raises concerns about the effective protection of SNAs throughout the plan, that have not yet been identified.	Oppose in part	This does not support the position taken in Federated Farmers submission.	Disallow
S560.019	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	Whole Plan	Raises concerns regarding gravel extraction and mining needs to “regardless of location, needs to be subject to a full effects assessment through a consenting process”.	Oppose	This contradicts Federated Farmers submission and is too far reaching into areas that need to have gravel removal and renewal processes to enable for the wellbeing and health and safety of residents on the coast.	Disallow
S560.030	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	Whole Plan	Where non-biodiversity offsetting or compensation is referred to in the Plan, provide policy direction, explanation, and potentially new definitions, clearly setting out what is required or envisaged. Alternatively delete the provisions referring to non-biodiversity offsetting	Neutral	Federated Farmers has an interest in this as it will potentially impact landowner members in the region.	Allow in part
S560.034	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	Whole Plan	Addresses the inconsistency of the overlays and provisions that are applying to them across the plan. Seeks to clear up any confusion and reorganize the structure of the plan.	Support in part	This supports Federated Farmers submission	Allow in part

S560.036	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	Whole Plan	Asks for consistency across all the chapters.	Neutral	This supports Federated Farmers submission Federated Farmers are in support of the need to have consistency across the board, but this does need to be applied where practically applicable, and in line with the WCRPS	Allow in part
S569.037	Minerals West Coast (S569)	Whole Plan	Submits to have the effects hierarchy placed within the plan to manage effects.	Support	This submission point supports parts of Federated Farmers submission.	Allow
S590.001	Paula Jones (S590)	Whole Plan	Seeks to see farming, mining, and quarrying defined in the plan as important aspects of the West Coast.	Support	This submission point supports Federated Farmers submission and strongly encourages the TTPP to amend the plan to reflect this.	Allow
S602.001	Department of Conservation (S602)	Whole Plan	The plan needs to give effect to other management plans and strategies under other Acts in Section 32 Reports of the region.	Support	This supports Federated Farmers Submission.	Allow
S602.012	Department of Conservation (S602)	Whole Plan	Seeks SNA management controls changed to matters of discretion.	Oppose	This does not support Federated Farmers submission. This put unnecessary regulation on farmers.	Disallow
S608.498	Grey District Council (S608)	Whole Plan	Seeks to find clarity around activities that may seek consent from District and Regional Council.	Support	We do not advocate for a more complicated and expensive consent process.	Allow

S616.015	New Zealand Heavy Haulage Association Inc (S616)	Whole Plan	Supports the need to be able to relocate buildings as permitted activity per zone.	Support	This supports Federated Farmers submission.	Allow
S620.001	Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	Whole Plan	Seeks to have consistency throughout the plan with the use of Te Reo, Maori values and consistency of maps used throughout the plan.	Support	This supports Federated Farmers submission.	Allow
S620.002	Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	Whole Plan	Seeks to have Te Reo recognized as the official language of New Zealand, and that the correct dialect has been used throughout the plan.	Support	This supports Federated Farmers submission and is important that the cultural values of local Maori are consistent with other plans across the country.	Allow
S620.003	Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	Whole Plan	Seeks to have Ngāti Māhaki o Makaawhio and Ngāti Māhaki ki Makaawhio is amended throughout the plan to Ngāti Māhaki.	Support	This supports Federated Farmers submission and seeks for consistency across the board, it is important that local Maori names are properly represented in any plan presented by council.	Allow
S620.005	Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio	Whole Plan	Seeks for consistently in place names that the Te Reo and English version are included when talking about the South Island and New Zealand.	Support	This supports points made in Federated Farmers submission and seeks to see a uniform approach taken. Uniformity across the plan avoids confusion and	Allow

	(S620)				misunderstanding of place names.	
S620.015	Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	Whole Plan	Seeks that all rules inside the zone chapters are given effect to the impacts on Poutini Ngāi Tahu values.	Neutral	Federated Farmers are unable to have a position on having values placed within the zones, without knowing the values themselves. Federated Farmers would welcome dialogue with Poutini Ngāi Tahu for the benefit of our members and the rural sector.	Allow in part
How the Plan Works						
S552.009	Buller Conservation Group (S552)	How the plan works	Seeks to have section 17 of the RMA included.	Neutral	Federated Farmers have an interest greater than the general public on this submission point as it can have direct implication on Federated Farmers members and submission.	Allow in part
S608.001	Grey District Council (S608)	How the plan works	Remove reference to Rural Production Zones which are incorrectly referred to in the plan.	Support	This supports Federated Farmers submission.	Allow
S151.012	Misato Nomura (S151)	How the plan works	Seeks to change how the permitted activity is worded in the plan.	Neutral	Federated Farmers have a general interest on behalf of Federated Farmers members and to mitigate any impact on them and the activities they do. However, the	Allow in part

					plan needs to be clear what is a permitted activity and what is non-permitting to provide clarity for the user.	
S560.333	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	Zone	Seeks to have vegetation clearance only dealt with the ECO chapter.	Strongly Oppose	This does not support the position taken in Federated Farmers submission. It is important that vegetation is allowed to be cleared for general farm maintenance of farm tracks, pest and weed management, managing riparian planting, health and safety etc. Federated Farmers would not want this to impose further restrictions on normal day to day farming activities. Existing use rights are covered under the RMA, as long as they are the same character, intensity and scale.	Disallow
S450.327	Waka Kotahi NZ Transport Agency (S450)	Overlays	Waka Kotahi has concerns with the overlays used within the Proposed District Plan due to the lack of accuracy of these overlays. However, it is understood that consultation has occurred with Poutini Ngāi Tahu on the development of the Sites and Areas of Significance to Māori overlays. Waka Kotahi defers to mana whenua regarding the accuracy of this layer to	Strongly Support	This point supports Federated Farmers submission. Federated Farmers feel that there is significantly more work to be done on the overlays and would expect these to be redone with more accuracy, consultation with all community stakeholders.	Allow

			ensure it is appropriate for the Te Tai o Poutini / West Coast District Plan.			
S511.08	Bradshaw Farms (S511)	Overlays	We understand that there is a possibility that this overlay will be extended from what is notified in the proposed plan. We do not support our properties being included in any extension. Associated provisions take an excessively restrictive approach to hazard management and mitigation.	Support	Federated Farmers supports the statement that overlays should not be extended from their current state and further assessment is required	Allow
Interpretation						
S166.013	New Zealand Agricultural Aviation Association (S166)	Interpretation	Seeks to have 'rural production' definition included in the plan in line with NPS.	Strongly Support	This supports Federated Farmers submission.	Allow
S552.021	Buller Conservation Group (S552)	Interpretation	Dairy farming increases the potential to contaminate fresh and coastal waters. Areas used predominantly for primary production activities, including intensive indoor and outdoor primary production	Strongly oppose	The submission point is misleading and did not address what the council was trying to mitigate with intensive indoor dairying.	Disallow
S522.022	Buller Conservation Group (S552)	Interpretation	Add an explanation of riverbank in relation to riparian margins	Oppose	Does not provide clarity.	Disallow
S166.006	New Zealand Agricultural Aviation Association	Definitions	Seeks to have 'improved pasture' definition amended to include the rules regarding native vegetation clearance.	Support	This supports our submission.	Allow

	(S166)					
S166.011	New Zealand Agricultural Aviation Association (S166)	Definitions	Seeks to include the 'rural airfield' definition as part of the operations of the rural sector.	Support	This submission point supports the position taken in Federated Farmers submission. Rural airfields are a vital component for many areas of agricultural use on the coast and are also used by the likes of DOC for their operations on the coast as well.	Allow
S166.012	New Zealand Agricultural Aviation Association (S166)	Definitions	Seeks clarity on helicopter landing areas.	Support	This submission supports the position taken in Federated Farmers submission and is integral to the function of the rural sector on the coast.	Allow
S171.011	Te Tai o Poutini Plan Committee (S171)	Definitions	Several terms in Rule SASM - R17 are not defined, yet are critical to rule interpretation and domestic scale and farming related activities may be unintentionally caught by this rule. These are Waste Disposal Facilities, Hazardous Facilities, Wastewater Treatment Plants and Wastewater Disposal Facilities..	Support	The definitions provide clarity and avoid areas of the rural sector being unintentionally captured.	Allow
S299.020	Transpower New Zealand Limited (S299)	Definitions	Seeks to define the word 'minimize' which would enable better interpretation.	Strongly Support	The definition would provide clarity to the reader.	Allow

S486.076	Horticulture New Zealand (S486)	Definitions	Seeks to include a definition for an 'artificial crop structure'.	Support	This submission point is practical and supports the position taken in Federated Farmers submission.	Allow
S486.077	Horticulture New Zealand (S486)	Definitions	Seeks to include a definition for 'greenhouses'.	Support	This submission point is practical and supports the position taken in Federated Farmers submission.	Allow
S489.001	Rural Contractors New Zealand Incorporated ("RCNZ") (S489)	Definitions	Seeks to change the definition for the 'rural contractor depot'.	Strongly Support	This is practical and an integral part of the rural sector's operations.	Allow
S507.001	Leonie Avery (S507)	Definitions	Seeks to include wintering barns in the definition of 'primary production'.	Support	We see this as a practical step to include all farm management types.	Allow
S510.001	Avery Bros (S510)	Definitions	Seeks that the definition could inadvertently capture herd homes and wintering barns (where the primary production activity principally otherwise occurs in an outdoor environment). We believe this should be amended so as to be clear that the use of herd homes and wintering barns is not included within the definition of Intensive Indoor Primary Production.	Support	Definition could inadvertently capture herd homes and wintering barns (where the primary production activity principally otherwise occurs in an outdoor environment). The definition should be amended to be clear that the use of herd homes and wintering barns is not included within the definition of Intensive Indoor Primary Production.	Allow
S516.001	Steve Croasdale (S516)	Definitions	Develop a definition of 'offensive industry'.	Support	This submission point supports the position taken in Federated Farmers	Allow

					submission and is practical and enables better understanding of what an offensive industry is.	
S516.002	Steve Croasdale (S516)	Definitions	Develop a definition of 'hazardous facilities'.	Support	Definition would provide further clarity within the plan	Allow
S516.003	Steve Croasdale (S516)	Definitions	Develop a clear definition for 'woodlot'.	Support	Would provide further clarity to the plan user and enable better understanding of how a woodlot is to be interpreted by this plan	Allow
S516.004	Steve Croasdale (S516)	Definitions	Seeks a clear definition 'shelterbelt'.	Support	We urge any definition to be followed in best practice with the proposed NPS Indigenous Biodiversity.	Allow
S538.002	Buller District Council (S538)	Definitions	A definition is sought for 'Artificial Outdoor Lighting'.	Support	This supports Federated Farmers submission. Lighting definition amendment would provide clarity to the reader	Allow
S538.006	Buller District Council (S538)	Definitions	Clarity needed around the term 'further measurable loss'.	Support	This supports Federated Farmers submission.	Allow
S547.044	Westpower Limited (S547)	Definition	There is no definition of minor upgrading although it is a term used in the rules	Support in part	Federated Farmers supports the need for a definition of minor upgrading	Allow in part
S552.028	Buller Conservation Group (S552)	Definitions	Seeks more protection of the major rivers and riparian margins.	Oppose	This submission point does not exclusively support Federated Farmers submission. Federated Farmers do support this, but not having the ability to	Disallow

					clear river margins and rivers of rock debris from high flow events could result in the endangerment of settlements downstream and lives.	
S552.224	Buller Conservation Group (S552)	Definitions	Seeks to include the definition of 'factory farming' in the plan.	Oppose	Federated Farmers believe that this definition is too far reaching and is an animal welfare issue that is covered by the Animal Welfare Act 1999.	Disallow
S553.024 S553.025	Frida Inta (S553)	Definitions	Seeks to include definitions from the Buller District Plan	Oppose	Definitions in the plan should reflect the needs of the whole region.	Disallow
S560.082	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	Definitions	Considers including a definition for indigenous vegetation.	Oppose in part	Federated Farmers supports having a definition for indigenous vegetation. The proposed definition is taken in part from the draft NPSIB. Federated Farmers supported the definition of Indigenous Vegetation from the draft NPSIB "indigenous vegetation means vascular and non-vascular plants that, in relation to a particular area, are native to the ecological district in which that area is located".-	Disallow in part
S599.006	WMS Group (HQ) Limited and WMS Land Co. Limited (S599)	Definitions	A new definition of Primary Production as contained in the National Planning Standards 2019.	Support	This submission point supports the position taken in Federated Farmers submission and it is important that the plan gives effect to the definitions from the NPS.	Allow

S566.340 S566.329 S566.373 S566.384 S566.362	Chris J Coll Surveying Limited (S566)	Definitions	Includes clear definitions for: 'shelterbelt', 'woodlot', 'hazardous facilities', 'reasonably measurable reduction in the local population', and "further measurable loss"	Support	This supports Federated Farmers submission. Develop new definitions which support clarity.	Allow
S602.018	Department of Conservation (S602)	Definitions	As the term 'compensation' is used throughout the Plan, define this term so its meaning is clear	Oppose in part.	The submitter seeks clarity on the use of the term 'compensation'. Having clarity on the term is useful for all parties, however we consider that the definition proposed requires further refinement.	Disallow in part
S602.020	Department of Conservation (S602)	Definitions	Seeks to define 'net gain',	Oppose in part	The submitter seeks clarity on the use of the term 'net gain'. Having clarity on the term is useful for all parties, however we consider that the definition proposed requires further refinement.	Disallow in part
S602.021	Department of Conservation (S602)	Definitions	As the term 'offset' is used throughout the Plan, define this term so its meaning is clear.	Oppose in part	The submitter seeks clarity on the use of the term 'offset'. Having clarity on the term is useful for all parties, however we consider that the definition proposed requires further refinement.	Disallow in part
S602.022	Department of Conservation (S602)	Definition	Seeks to define the watercraft, as a vessel or craft that travels on water.	Support in part	This submission point partially supports Federated Farmers submission. Federated Farmers believe that it is important that these	Allow in part

					do include commercial and recreational craft, as many rivers and waterbodies are used as roads on the coast to access livestock and for pest management including by DOC itself. Federated Farmers seek anything after 'This excludes' removed from the submission point.	
S603.004	BRM Developments Limited (S603)	Definition	Submitter seeks the 'Primary Production' definition as in the 2019 National Planning Standards.	Support	Support definitions that align with the National Planning Standards	Allow
S620.026	Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	Definitions	Submitters seeks the inclusion of definitions for: 'Plantation forestry', 'shelter belts' and 'woodlots' which are terms included in Rule SASM-R16 which are not defined.	Support	Provides clarity and aligns with the National Planning Standards.	Allow
S620.027	Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	Definitions	The submitter seeks the inclusion of definitions for 'landfills', 'waste disposal facilities', 'hazardous facilities', and 'wastewater treatment plant and wastewater disposal facilities	Support	Support the need to include definitions for waste sites. It provides clarity.	Allow
Interpretation						
S560.054	Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te	Interpretation	The submitter seeks to clarify whether this is specific to vehicle access or includes walking access, to private property, like driveways or	Neutral	Federated Farmers seek clarity if this does mean access to private property.	Allow in part

	Runanga o Makaawhio (S620)		other situations.			
S166.005	New Zealand Agricultural Aviation Association (S166)	Interpretation	Retain inclusion of rural airstrips and helicopter landing areas in the definition of agricultural, pastoral and horticultural activities.	Support	This supports Federated Farmers submission and the importance of rural airstrips for the rural economy.	Allow
S166.038	New Zealand Agricultural Aviation Association (S166)	Interpretation	Seeks to amend the agriculture, pastoral and horticulture definition to include agricultural aviation activities for landing strips.	Support	This submission point supports Federated Farmers submission.	Allow
S166.039	New Zealand Agricultural Aviation Association (S166)	Interpretation	Seeks to include the needs of aviation in the need for conservation, agricultural and forestry purposes.	Support	This submission point supports Federated Farmers submission. Due to the relative isolation of the West Coast, Federated Farmers strongly support this for the rural communities.	Allow
S486.001	Horticulture New Zealand (S486)	Interpretation	Amend title of definition to 'rural production activities'. Amend references to 'agricultural, pastoral, horticultural activities' to 'rural production activities'. Delete exclusion of intensive indoor primary production from a) This supports the position taken in our submission, for the need to have the term amended to better suit what the industry is doing.	Support	This supports the position taken in Federated Farmers submission, for the need to have the term amended to better suit what the industry is doing.	Allow

S560.056	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	Interpretation	<p>Include the following advice notes in GRUZ - R1 and all other rules that permit these activities:</p> <p>a) "The NES for Freshwater includes regulations on sphagnum moss"</p> <p>b) "Any indigenous vegetation clearance or disturbance is subject to the relevant rules in the Ecosystems and Biodiversity Chapter."</p> <p>c) "Activities in the Coastal environment are subject to the CE chapter provisions"</p>	Oppose	This does not support Federated Farmers submission.	Disallow
S560.410	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	Interpretation	<p>Delete farm quarries from this definition, given the lack of SNA identification. Alternatively, retain in definition but amend all relevant provisions in GRUZ and elsewhere to ensure SNAs adequately protected</p>	Strongly Oppose	This does not support Federated Farmers submission. Farm quarries are an integral part of the farm system and are essential for the health and safety of farm operations such as farm tracks. They are not commercial operations. Federated Farmers believe this is too far reaching and is a failure to understand the need for quarries on farm.	Disallow
S560.411	Royal Forest and Bird	Interpretation	<p>Include the WCRPS definition for "Significant Natural Area, or</p>	Neutral	This supports parts of Federated Farmers	Allow in part

	Protection Society of New Zealand Inc. (Forest & Bird) (S560)		SNA" in the Interpretation section.		submission. That the SNA definition needs to be consistent with what is used nationwide. It is preferable that the NPSIB is used throughout the plan.	
S166.007	New Zealand Agricultural Aviation Association (S166)	Interpretation	NZAAA supports the inclusion of a definition for conservation activity but seeks that it explicitly includes weed and pest control and the use of aircraft.	Strongly Support	This supports Federated Farmers submission. Strongly agree with the definition proposed by the NZAAA for conservation.	Allow
S602.013	Department of Conservation (S602)	Interpretation	The definition of conservation activities requires an amendment to be explicit that it excludes commercial activities to avoid any unintended consequences with the current definition.	Strongly oppose	This does not support Federated Farmers submission. To restrict the commercial activity of conservation would have significant impacts on the wellbeing and economy of the West Coast, whose businesses rely on commercial conservation.	Disallow
S608.006	Grey District Council (S608)	Interpretation	Critical Infrastructure - to give effect to the definition in the West Coast Regional Policy Statement.	Support	This supports Federated Farmers submission This is a commonsense approach and covers all areas of critical infrastructure that needs protection, as defined in the WCRPS.	Allow
S486.002	Horticulture New Zealand (S486)	Interpretation	Either include the definition of existing use rights from section 10 of the RMA or remove the definition as a whole.	Support	Supports the position taken in our submission with the RMA and existing use rights or any structure that is currently standing and erected. This should be in line with section 10 of the RMA, any deviation from	Allow

					that should be amended to follow the Act.	
S602.014	Department of Conservation (S602)	Interpretation	Definition of indigenous vegetation clearance - make it explicit that this also includes the damage and destruction of indigenous vegetation, including from mob stocking.	Oppose in Part	This does not support Federated Farmers submission fully. Too far reaching beyond what indigenous vegetation clearance extends too.	Disallow
S609.001	Avery Brothers (S609)	Interpretation	The definition of Intensive Indoor Primary Production Means primary production activities that principally occur within buildings and involve growing fungi, or keeping or rearing livestock (excluding calf-rearing for a specified time period) or poultry. The use of herd homes and wintering barns where the primary production activity principally otherwise occurs in an outdoor environment is not included in this definition.	Support	Provides clarity to ensure herd homes and wintering barns are not inadvertently captured by the definition.	Allow
S486.003	Horticulture New Zealand (S486)	Interpretation	The definition for existing use rights refers to lawfully established activities so it needs to be clear how an activity is lawfully established. It is confusing and also incorrect to then state that lawfully established activities include activities permitted...by	Support	This supports Federated Farmers submission.	Allow

			an existing use right. The definition can be restructured to make it clear that lawfully established can be achieved by a number of ways, which are independent of each other			
S560.067 & S560.422	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	Interpretation	The definition should be clear that with respect to activities for which resource consent or license is required, the activity ceases to be lawful when the consent or license expires.	Oppose in part	This does not support the position taken in Federated Farmers submission. We seek the definition stays as drafted.	Disallow
S438.017	Manawa Energy Limited (Manawa Energy) (S438)	Interpretation	Manawa supports the inclusion of a definition of the term 'riparian margin', however considers that the margins included within the definition are excessive for lakes.	Support in part	Riparian Margins need to provide protection where required, otherwise a minimum setback should be put in place, not to create conditions on farm that make the land unworkable	Allow in part
S486.006	Horticulture New Zealand (S486)	Interpretations	A significant electricity distribution line is any line greater than 33kV.	Support	This supports Federated Farmers submission. This supports the position taken in our submission. It is important to seek amendments to change from a 33kV to 66kV as proposed.	Allow
S473.015	Katherine Gilbert (S473)	Interpretation	Incorporate the definition for Significant Natural Area from the RPS into the plan, and use this terminology consistently throughout the plan.	Support	This supports Federated Farmers submission. Support the clarity from the RPS and using what has already been defined for consistency throughout the plan.	Allow

S620.042	Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	Interpretation	Amend the definition of 'waterbody' to reflect the areas zoned. That the relationship between the definition and the zone is clarified.	Neutral	This supports parts of Federated Farmers submission.	Allow in part
S486.004	Horticulture New Zealand (S486)	Interpretations	Inclusion of a definition for reverse sensitivity is supported. However, it would be better to rely on the definition of 'lawfully established' in the Plan rather than using 'approved, existing or permitted activity'	Support	This supports the Federated Farmers submission.	Allow
S560.065	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	Interpretation	The Plan needs to protect the significant habitats of indigenous fauna, where that is found outside indigenous vegetation. As such, the definition should not be limited to indigenous clearance. We have submitted below that most of the ECO rules should only apply to indigenous vegetation clearance, except within Significant Natural Areas, where the rules should regulate all vegetation clearance. Destruction and smothering are also forms of vegetation clearance that should be added to the definition.	Oppose	This does not support FFNZ submission. FFNZ submitted on the definition of indigenous vegetation.	Disallow

S508.001	Jared Avery (S508)	Interpretation	Amend definition of Intensive Indoor Primary Production	Support	This supports FFNZ submission. Provides clarity	Allow
S538.012	Buller District Council (S538)	Interpretation	Council seeks an addition to the definition that clarifies that herd homes and wintering barns (where the primary production activity principally occurs in an outdoor environment) are not included within the definition.	Support	This supports FFNZ submission, as it Provides clarity.	Allow
S533.021	Frida Inta (S553)	Interpretation	The submitter seeks change to definition of intensive indoor primary production.	Oppose	Does not support FFNZ submission.	Disallow
S486.003	Horticulture New Zealand (S486)	Interpretation	The submitter is proposing an amended definition for Lawfully Established.	Support	This supports FFNZ submission. Provides clarity.	Allow
S560.069	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	Interpretation	Submitter requests clarification of Māori Purpose Activities	Neutral	This does/does not support FFNZ submission. Clarification of intended meaning would be helpful.	Allow in part
S620.040	Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	Interpretation	The submitter requests “to ensure consistency in approach, aid a plan user and enable Poutini Ngāi Tahu to undertake cultural activities and enable some activities on cultural redress land”.	Neutral	FFNZ members have an interest in terms of access to property.	Allow in part
S441.005	Silver Fern Farms Limited by its authorised	Interpretation	Silver Fern Farms requests that a definition be included for a noise sensitivity activity, because this term is referred to	Support	This supports FFNZ submission.	Allow

	agents Mitchell Daysh Limited (S441)		in the definition of 'Notional Boundary' and is referred to throughout the Plan			
S166.010	New Zealand Agricultural Aviation Association (S166)	Interpretation	NZAAA seeks that it is clear that agricultural aviation activities are not classed as a temporary activity.	Support	This supports FFNZ submission. Aligns with farm activities and should not be classed as temporary.	Allow
S602.016	Department of Conservation (S602)	Interpretation	Seeks to include definition of SNA.	Oppose in part	This should be included in the definitions and should be in line with section 6 of the RMA which gives affect to SNA's. It is also worthy to note that the proposed plan should follow the proposed NPSIB 2023 draft that has just been released for clarity.	Disallow in part
Part 2 – District Wide Matters						
S190.003	Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	Strategic Direction	Seeks to include agriculture under this chapter.	Neutral	This complements FFNZ submission somewhat. FNZ have an interest on this topic greater than the public on this issue for our members.	Allow in part
S484.003	Development West Coast (S484)	Strategic Direction	DWC submits that and additional item supporting thriving communities be included.	Support	This supports FFNZ submission. This supports the position taken in FFNZ direction and is a commonsense approach.	Allow
S166.001 S166.002	New Zealand Agricultural Aviation Association	Strategic Direction	Retain objective AG-O1, AG-O2	Support	This submission point supports FFNZ submission. FFNZ seek to retain what the NZAAA have submitted on.	Allow

	(S166)					
S560.433	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	Strategic Direction Overview	The submitter states that the intent at 4. does not accurately reflect the sustainable management purpose of the Act, of with protection is generally to the natural environment along with use and development. It also ignores Councils' functions under s31.	Oppose	This does not support FFNZ submission.	Disallow
S486.008	Horticulture New Zealand (S486)	Strategic Direction	The submitter requests amending AG-O1 as follows: The productive value of highly productive land and agricultural land is maintained for current and future rural production activities	Support	This supports FFNZ submission. The use of 'highly productive land' is in line with the NPS and thus terminology should be used. We support the changes proposed.	Allow
S486.009	Horticulture New Zealand (S486)	Strategic Direction	The submitter requests amend AG-O2: The significance of rural production activities to the West Coast economy is recognised and provided for. And, a new AG-O3: Enable the rural industries and services needed to maintain rural production activities in rural areas.	Support	This supports FFNZ submission. Provides the use of more rural inclusive term for all users of rural land.	Allow
S560.087	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	Strategic Direction	The submitter requests the removal of the word 'enable'.	Oppose	This does not support FFNZ submission. The word 'enable' is important for the sector as seen as encouraging sustainable	Disallow

	(S560)				development across the sector and on the coast. FFNZ seek that the proposed wording is not accepted.	
S440.005	Te Tumu Paeroa - The office of the Māori Trustee (S440)	Strategic Direction	The Māori Trustee considers that there should be an express objective to address the impacts that climate change will have on whenua Māori and state how this Proposed Plan intends to build resilience for Māori landowners. This new objective will also need to expressly address managed retreat.	Neutral	Resilience needs to be considered for Māori land owners of the rural communities-	Allow in part
S299.021	Transpower New Zealand Limited (S299)	Strategic Direction	Correct classification for the national grid.	Support	Support that the national grid is given the correct classification as infrastructure such as power is seen as a vital asset for some remote areas of the coast, especially rural communities.	Allow
S620.061	Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	Strategic Direction	Submitter seeks to recognise that due to climate change some infrastructure may need to be moved to protect its function.	Support	FFNZ recognizes the commonsense approach taken here, and support the inclusion of structures needing to move in adaption to climate change, within reason and after all other possible mitigations have been explored.	Allow

S166.003	New Zealand Agricultural Aviation Association (S166)	Strategic Direction	The submitter seeks to amend NENV-O1. NENV-O1 seeks to protect a range of features. To be consistent with s6 of the RMA the focus should be on 'outstanding' natural features and landscapes and 'significant' indigenous biodiversity Also the protection is from 'inappropriate subdivision use and development'.	Support	This supports FFNZ submission. This supports the approach FFNZ have taken; FFNZ support the submission points raised by the NZAAA.	Allow
S166.004	New Zealand Agricultural Aviation Association (S166)	Strategic Direction	The submitter seeks to amend NENV-O3. The strategic objective seeks to protect the natural environment values NZAAA submits that weed and pest control are critical tools in maintaining the natural environment and seeks to have this recognised in the objectives.	Support	This supports FFNZ submission. Pest control is important to protect and enhance the environmental values of an area. FFNZ seek to support the following amendments proposed.	Allow
S441.009	Silver Fern Farms Limited by its authorised agents Mitchell Daysh Limited (S441)	Strategic Direction	Silver Fern Farms suggests amending the objective to provide specific details on areas which are to be 'recognised and protected' so as to align with the objectives set out in Part 2 of the RMA.	Support	This supports FFNZ submission.	Allow
S486.010	Horticulture New Zealand (S486)	Strategic Direction	The submitter seeks to amend NENV-O1.	Support	This supports FFNZ submission. Provides clarity	Allow

			Amend NENV-O1: The natural features that contribute to the West Coast's character and identity and Poutini Ngai Tahu's cultural and spiritual values are recognised by preserving natural character, and protecting outstanding natural features and landscapes and significant indigenous biodiversity from inappropriate subdivision use and development.		and is consistent with S6 of the RMA.	
S599.028	WMS Group (HQ) Limited and WMS Land Co. Limited (S599)	Strategic Direction	Submitter seeks consideration of the values and significance and management of potential adverse effects	Support	This supports FFNZ submission. This supports the proposed changes FFNZ put forward and recognizes Section 6 of the RMA.	Allow
S620.067	Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	Strategic Direction	Provides a balance between protection of important environment areas and sustainable management.	Support	This supports FFNZ submission. Provides recognition of balance between important environmental areas and sustainable management.	Allow
S486.011	Horticulture New Zealand (S486)	Strategic Direction	Submitter seeks to retain NENV-O4 b).	Support	This supports FFNZ submission. Support the identification of areas where subdivision use, and development can occur.	Allow
S560.011	Royal Forest and Bird Protection Society of New	Strategic Direction	Submitter seeks to amend NEN-O4.	Oppose	Oppose – amendment does not align with terminology from RMA 6(b) and (c).	Disallow

	Zealand Inc. (Forest & Bird) (S560)				Retain as notified.	
S441.010	Silver Fern Farms Limited by its authorised agents Mitchell Daysh Limited (S441)	Strategic Direction	The submitter seeks amendment to UFD-O1.	Support	This supports FFNZ submission. Support – recognition and managing potential reverse sensitivities between incompatible activities and zones.	Allow
EIT-Energy, Infrastructure and Transport						
S553.044	Frida Inta (S553)	Energy	The submitter requests amendment to R10.	Oppose	This does not support FFNZ submission. The amended version does not provide clarity.	Disallow
S486.013	Horticulture New Zealand (S486)	Energy	Submitter requests recognition that other activities can occur alongside regionally significant infrastructure.	Support	This supports FFNZ submission. Statement ensures that other activities can occur alongside regionally significant infrastructure.	Allow
S486.014	Horticulture New Zealand (S486)	Energy	Submitter seeks to Retain ENG-O1.	Support	This supports FFNZ submission. The importance of the electricity infrastructure to the community is recognized.	Allow
S486.015	Horticulture New Zealand (S486)	Energy	Submitter seeks to amend ENG-O3 To provide for the development, operation, maintenance and upgrade of energy activities and ensure that they are not compromised by the adverse effects of incompatible subdivision, use and	Support	Supports the need not to compromise energy by the incompatible subdivision and development.	Allow

			development.			
S486.017	Horticulture New Zealand (S486)	Energy	Submitter seeks to amend ENG-P3 Minimise reverse sensitivity effects from subdivision, use and development on energy activities and ensure that ensure that the ongoing operation, maintenance, upgrade or development is not compromised.	Support	Supports FFNZ position on the need to minimize reserve sensitivity effects from subdivision and energy activities.	Allow
S486.019	Horticulture New Zealand (S486)	Energy	Submitter seeks to amend ENG-R6 by deleting 4) and relying on clause 5) which applies the distances in NZECP34:2001.	Support	Supports FFNZ position of the 12m setback not aligning with the NZECP24:2001.	Allow
S486.020	Horticulture New Zealand (S486)	Energy	Submitter seeks to amend ENG-R7 (1) iv) by deleting 'produce packing facilities'. Retain ENG-R7 2) iii) c) and d).	Support	This supports FFNZ submission.	Allow
S299.028	Transpower New Zealand Limited (S299)	Energy	Submitter seeks to amend parts of the overview as follows: The Energy Chapter contains the objectives, policies, rules for managing energy activities.	Oppose	Does not provide clarity in terms of what policy, objectives and rules from other chapters apply.	Disallow
S443.015	Suzanne Hills (S443)	Energy	Submitter seeks to amend policy to reflect the cumulative effect of multiple hydro schemes.	Support in part	Support somewhat the needs to consider wellbeing needs to be considered such as social, economic, environmental, and cultural. Some hydro schemes will	Allow in part

					be for private use and may be the only source for the property.	
S462.028	Inger Perkins (S462)	Energy	Submitter seeks to support micro renewables and distributed energy generation.	Support	This supports FFNZ submission.	Allow
S190.084	Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	Infrastructure Rules	Submitter seeks to include additional Drinking Water Source Protection Zone (SPZ) overlay rules within this section.	Neutral	FFNZ have an interest in drinking water sources protection zones and rural land, and the implications of such proposals.	Allow in part
S274.008	Herenga ā Nuku Aotearoa Outdoor Access Commission (S274)	Transport	Seeks to amend TRN-R5: to include all legal roads.	Oppose	Some legal roads adjoining farmland will require engagement with the landowner regards Health and Safety especially where those roads are not fenced.	Disallow
S538.082	Buller District Council (S538)	Transport	Seeks to Amend Rule 10 to include the likes of strips and reserves.	Neutral	FFNZ have an interest in that public land unformed legal roads are adjacent to farmland, and often unfenced, raising health and safety concerns.	Disallow in part
HAZ- Hazards and Risks						
S538.090	Buller District Council (S538)	Contaminated Land	Seeks to retain as notified.	Support	This submission point supports the position taken in FFNZ submission and it is important that the proposed plan is in line with National Standards.	Allow
S613.005	Fuel Companies (S613)	Hazardous substances policies	Seeks to retain Policies HS-P2, HS-P3, HS-P4 as notified.	Support	These support FFNZ submission and cover the needs for what is required in	Allow

					this chapter.	
S486.024	Horticulture New Zealand (S486)	Hazardous Substances	Seeks to include a definition for major hazard facilities: Any facility deemed a Major Hazardous Facility under the Health and Safety at Work Major Hazardous Facilities Regulations 2016.	Support	This submission supports the position taken in FFNZ submission.	Allow
S488.020	West Coast Regional Council (S488)	Natural Hazards	Submitter seeks That the Plan is refined to ensure there are no adverse effects on the social or economic wellbeing of West Coast people and communities, and no undue burden is placed on the West Coast Community from the proposed Plan Provisions.	Support	Natural Hazard overlays do need to follow natural land contours, this avoids confusion with stakeholders and landowners.	Allow
S609.004	Avery Brothers (S609)	Natural Hazards Objectives	Submitter seeks to include a new provision, to ensure the role of hazard mitigation played by protective structures and works that minimise impacts of hazards including rock walls and stopbanks is recognised and protected.	Support	It is important that riverbanks, rock protection are protected to ensure that people's lives and property are protected from any natural hazards. Renewal is important to make sure these structures are well maintained. This supports the position that FFNZ have taken.	Allow
S511.005	Bradshaw Farms (S511)	Natural Hazards	Submitter seeks to delete "and there is significant public or environmental benefit from doing so", from NHP10.	Support	This supports FFNZ submission. It is important for landowners to be able to engage with professionals when and where required. It	Allow

					is important that any technical solution is utilized to mitigate the effects of natural hazards.	
S510.008	Avery Bros (S510)	Natural Hazards	Seeks to amend rule so that there is a ten year period within which lawfully established buildings can be reconstructed/replaced in all overlays or delete time limit.	Support	This supports FFNZ submission. 10 years is an adequate time to allow for the removal/retreat of a property – the proposed timeframe is quite restrictive.	Allow
HCV- Historical and Cultural Values						
S438.065	Manawa Energy Limited (Manawa Energy) (S438)	Historic Heritage	Submitter seeks to amend HH - P7, The item poses a significant risk to public safety; e the item is adversely affecting the efficient functioning or operation of regionally significant infrastructure.	Support	This supports FFNZ submission. Support the need for a suitably qualified heritage professional to deem if heritage buildings need demolished or assessed.	Allow
S538.171	Buller District Council (S538)	Historic Heritage	Retain HH - R6 as notified.	Support	This supports FFNZ submission.	Allow
SASM – Sites and Areas of Significance to Māori						
S520.001	Taipo Dairies Limited (S520)	Sites and Areas of Significance to Maori	Submitter seeks to remove Sites and Areas of Significance to Māori from the plan.	Support in part	This supports some of FFNZ submission. Landowners are looking for more understanding and engagement regarding what the SASM's mean for their property. This aligns with the FFNZ submission.	Allow
S538.195	Buller District Council (S538)	Sites and Areas of Significance to Māori	Submitter seeks to have consideration is given to categorising the SASMs to	Support	Agree with the need for a framework to be put in place	Allow

			reflect their varying importance and that the rule framework is reviewed accordingly.		to ensure that some of these sites that have been captured does not result in areas being unintentionally captured and restrictions on the area create significant effects that can't be mitigated.	
S440.017	Te Tumu Paeroa - The office of the Māori Trustee (S440)	Sites and Areas of Significance to Māori	Submitter seeks to amendments O2. Poutini Ngāi Tahu are able to, in agreement with affected landowners, access, maintain and use areas and resources of cultural value within identified sites, areas and cultural landscapes.	Support	FFNZ agree that any access to land should be done in agreement with the private landowner, on conditions that suit both parties. It is important to remember that these are working farms and they are liable under the Health and Safety Act 2015 if anything was to happen to Māori accessing these sites on private property.	Allow
S608.011	Grey District Council (S608)	Sites and Areas of Significance to Māori.	Submitter seeks to remove the sites so that they can be further reviewed and reassessed.	Support in Part	Providing more detail and clarity would be helpful to all parties, particularly landowners.	Allow
S608.013, S608.012, S608.486	Grey District Council (S608)	Sites and Areas of Significance to Māori	Submitter seeks to remove 'access' from Objectives.	Support	Agree that access should be removed from the objectives.	Allow
S270.008	Stephen Page (S270)	Sites and Areas of Significance to Māori	Submitter seeks from Māori clarify process for identification of any further SASM.	Support	This supports FFNZ submission. Clarification around the process to identify and values of a SASM would be beneficial for the private landowners.	Allow

S440.019 & S440.020	Te Tumu Paeroa - The office of the Māori Trustee (S440)	Sites and Areas of Significance to Māori	Submitter seeks to ammend P14(d). Measures are taken, in agreement with affected landowners, to maintain or enhance the ability of Poutini Ngāi Tahu to access and use the site or area of significance for mahinga kai, karakia, monitoring, cultural activities and ahi kā roa.	Support	This supports the position taken in FFNZ submission and is important that a relationship and permission is gained from affected landowners before the sites can be assessed, especially on a working farm.	Allow
S538.182	Buller District Council (S538)	Sites and Areas of Significance to Māori	Submitter seeks assurances that there will be a written approval pathway for applicants and that Rūnanga have the capacity to deal with requests in a timely manner.	Support	This supports the position taken in FFNZ submission, but FFNZ are worried about the resource capacity of the iwi and seek to see how they would be able to manage these applications in a timely manner. If there is not capacity, it could be that this rule and any other rules that require iwi consent are delayed until they have the capacity.	Allow
S608.029	Grey District Council (S608)	Sites and Areas of Significance to Māori	Seeks to remove "Condtion 3".	Support	Agree that if 'unless Pounamu and Aotea is identified as being present on the subject site then the use of the land should remain unrestricted'.	Allow
S620.405	Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	Sites and Areas of Significance to Māori	Submitter seeks that there is amending of rule SASM-R16 so that it does not apply to amenity plantings.	Strongly Support	Supports the need that amenity plantings are not captured in these rules.	Allow

S486.027	Horticulture New Zealand (S486)	Sites and Areas of Significance to Māori	Seeks to amend SASM-R17 by deleting 'hazardous facilities' and replacing with 'major hazard facility' and define as sought above.	Support	This supports FFNZ submission, regarding hazardous facility definition needed.	Allow
S608.485	Grey District Council (S608)	Sites and Areas of Significance to Māori	Submitter requests that a framework is sought that will not impinge on the use of private property.	Support in part	This supports parts of FFNZ submission. Having clarity on the SASM's and how they relate to private property will be helpful.	Allow
S608.014	Grey District Council (S608)	Sites and Areas of Significance to Māori	Submitter seeks to remove 'access' from Policy.	Support in part	Access to private property is only via engagement and agreement with landowners, and supports parts of FFNZ submission.	Allow
Natural Environment Values						
S488.022	West Coast Regional Council (S488)	Natural Environmental Values	Submitter seeks that that the Plan is refined to ensure there are no adverse effects on the social or economic wellbeing of West Coast people and communities, and no undue burden is placed on the West Coast Community from the proposed Plan provisions.	Support	Support that the rules and maps place a significant burden on the wellbeing of the coast's people. Exclusions of highly productive land is needed to protect the wellbeing of the Coasters.	Allow
S553.027	Frida Inta (S553)	Natural Environmental Values	Submitter seeks to include a link to the relevant section of the Regional Land and Water Plan for Gravel Clearances. Gravel Clearances are permitted under the RLWP.	Oppose in part	This does not support FFNZ submission. Protection is needed for waterbodies, but it must not be protected that these protections would have perverse effects on the health and wellbeing of Coasters. Rock and gravel clearance from Rivers is	Disallow in part

					needed to protect settlements, farms, and roads from significant damage in natural events.	
S608.037	Grey District Council (S608)	Ecosystems and Biodiversity	Submitter seeks to remove all references to "Site or Area of Significance to Māori" in the Chapter.	Support	This supports FFNZ submission. SASM should be reassessed and mapped to avoid any land that may be unintentionally captured on the maps and subject to rules that are not required.	Allow
S486.088	Horticulture New Zealand (S486)	Ecosystems and Indigenous Biodiversity	Submitter seeks provisions to provide for the active management of pest plants and pest animals including those identified in the Regional Pest Management Plan and unwanted organisms under the Biosecurity Act 1993.	Support	This supports FFNZ submission. FFNZ agree that there needs to be a provision that actively manages pest plants and pest animals including those identified in the Regional Pest Management Plan and unwanted organisms under the Biosecurity Act 1993.	Allow
S560.009	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	Ecosystems and Indigenous Biodiversity	Submitter seeks to amend the Plan provisions to ensure of protection to significant habitats of indigenous fauna, including from exotic vegetation clearance.	Oppose	This does not support FFNZ submission. Without proper controls on exotic vegetation, it will cause significant issues for native vegetation and create health and safety hazards on the land. What is proposed is over restrictive and unrealistic.	Disallow
S560.195	Royal Forest and Bird Protection Society of New Zealand Inc.	Ecosystems and Indigenous Biodiversity	Seeks to amend that wetlands on the West Coast The National Environmental Standards for Freshwater	Neutral	This does/does not support FFNZ submission. Wetlands should follow the setbacks outlined in the NPS, to avoid	Disallow in part

	(Forest & Bird) (S560)		Management includes regulations for activities within, and within setbacks from, natural wetlands. These activities are managed by the West Coast Regional Council under the NES for Freshwater regulations. It should be noted that the setbacks for activities within those regulations may be different to those set out in this Plan and may require resource consent to be sought from the regional council.		any confusion and cause landowners to gain consent.	
S560.196	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	Ecosystems and Indigenous Biodiversity	Submitter seeks to identify and protect areas of significant indigenous vegetation and significant habitats of indigenous fauna on the West Coast/Te Tai o Poutini, including mapping of Significant Natural Areas consistently across all districts and including these areas in Schedule Four by 2025.	Oppose	This does not support FFNZ submission. Unrealistic requirement to have all the SNA's mapped by 2025, FFNZ believe that it should be done by 2035 to ensure that accuracy and attention to detail followed.	Disallow
S560.197	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	Ecosystems and Indigenous Biodiversity	Submitter seeks to amend ECO - O2: "To only consider provision de for appropriate subdivision, use and development within areas of significant indigenous vegetation and significant habitats of indigenous fauna where the values of the area can be maintained or enhanced and the area is	Oppose	This does not support FFNZ submission. Retain as notified.	Disallow

			protected."			
S608.041	Grey District Council (S608)	Ecosystems and Indigenous Biodiversity	Submitter seeks that ECO-02 is retained as notified.	Support	This supports FFNZ submission	Allow
S560.198	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	Ecosystems and Indigenous Biodiversity	Submitter seeks to change wording to align with s6(c) of the RMA.	Neutral	Management of an SNA is needed to maintain it, especially on a working farm. It does not support FFNZ submission. Retain as notified.	Allow in part
S602.065	Department of Conservation (S602)	Ecosystems and Indigenous Biodiversity	Seeks to amend ECO-04.	Oppose	Does not agree with the position FFNZ have taken in our submission and will create unnecessary restrictions on private properties. Management of the land would allow for the protection and enhancement of these species. Retain as notified.	Disallow
S486.029	Horticulture New Zealand (S486)	Ecosystems and Indigenous Biodiversity	Submitter seeks to ensure that Buller and Westland districts complete mapping of significant areas of indigenous biodiversity by 2025. Ensure that the rules enable horticulture to establish on the West Coast and that the identification of significant areas of indigenous biodiversity is not a barrier to such activity.	Support	FFNZ are concerned that our members would require to do an assessment for indigenous biodiversity, rather than the council mapping such areas for this plan. This adds significant cost and bureaucracy to the process that is not needed. The more Council can map accurately it is beneficial to the landowner.	Allow

S560.476	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	Ecosystems and Indigenous Biodiversity	Submitter seeks alternative relief for ECO-P2.	Oppose	This does not support FFNZ submission, retain as notified.	Disallow
S577.033	Koiterangi Lime Co LTD (S577)	Ecosystems and Indigenous Biodiversity	Seeks to amend point d of ECO-P2 to, the activity has a functional, technical, operational or locational need to be located in the area;	Support	This supports FFNZ submission	Allow
S560.202	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	Ecosystems and Indigenous Biodiversity	Seeks to have further protection to SNA's with subdivisions.	Oppose in part	We support the correct terminology for SNA's, but the subdivision additions does not support FFNZ submission.	Disallow
S602.069	Department of Conservation (S602)	Ecosystems and Indigenous Biodiversity	Submitter seeks to amend ECO-P3 to enable any measures to protect, enhance and restore biodiversity to be considered when applying the policy, and biosecurity programmes to manage plant and predator pests.	Support	This supports FFNZ submission. Pest control is important to protect biodiversity and supports the position FFNZ have taken.	Allow
S563.023	Geoff Volckman (S563)	Ecosystems and Indigenous Biodiversity	The submitter seeks to define the technical ecological terms used in ECO-P6.	Support	Supports the position taken in FFNZ submission, the need for clarification is required.	Allow
S440.026	Te Tumu Paeroa - The office of the Māori Trustee (S440)	Ecosystems and Indigenous Biodiversity	Submitter seeks to amend ECO P8(b) should be amended to 'improving access where appropriate' to areas of indigenous biodiversity which are significant to Poutini Ngāi	Neutral	Access can only be gained through relationships and cannot be forced upon the landowner. This does/does not support FFNZ submission.	Allow in part

			Tahu to acknowledge that some areas of indigenous biodiversity may be located on private land. Access can only be gained through relationships and cannot be forced upon the landowner.			
S599.056	WMS Group (HQ) Limited and WMS Land Co. Limited (S599)	Ecosystems and Indigenous Biodiversity	Seeks to make it in with the Coastal Environment chapter of the West Coast Regional Policy Statement 2020.	Support	Wording changes proposed support the position taken in FFNZ submission.	Allow
S560.209	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	Ecosystems and Indigenous Biodiversity	Seeks to change ECO - P9, Replace with the exact wording of Policy 2, 3, 4 and 5, Chapter 7 of the WCRPS or incorporate those policies by reference.	Neutral	Asks for the policy to be deleted to be in line with the WCRPS. A mix between the RPS and FFNZ submission would enable well-rounded settings for offsets.	Allow in part
S602.073	Department of Conservation (S602)	Ecosystems and Indigenous Biodiversity	Submitter seeks to amend Policy ECO-PC9 as offsetting and compensation should not be 'provided for', and instead should only be allowed where the effects management hierarchy has been applied, and where a net gain can be achieved.	Oppose	The submission does not support the position taken in FFNZ submission and would see further unnecessary regulation. A more common-sense approach is needed.	Disallow
S538.208	Buller District Council (S538)	Ecosystems and Indigenous Biodiversity	Submitter seeks to Insert a new permitted activity rule to allow for vegetation removal in the Buller and Westland Districts outside of an SNA. This will allow for the status quo until such time as SNAs	Support	A commonsense approach taken by council to have a rule that protects native vegetation before all of the SNA's are identified, mapped and consulted on with landowners affected.	Allow

			are identified and inserted into Schedule 4. Once SNAs have been scheduled, the new rule will also allow indigenous vegetation clearance in circumstances where it is outside a scheduled SNA.		Supports FFNZ submission.	
S560.010	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	Ecosystems and Indigenous Biodiversity	Seeks to identification, and mapping of SNAs is proposed to be identified through a resource consent process.	Oppose	Proposed rules are onerous and do not take into consideration 'existing use rights', which are required for pastoral renewal. If that does not occur, it could put the SNA at risk. Does not support FFNZ Submission.	Disallow
S560.024	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	Ecosystems and Indigenous Biodiversity	Submitter seeks to amend the Plan so that vegetation clearance for mineral extraction within any significant natural area(s) is at least a non-complying activity.	Strongly Oppose	The proposed rule is onerous on the landowner and does not take into consideration 'existing use rights', health and safety aspects for high flow events and road maintenance. Does not support FFNZ submission.	Disallow
S560.212	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	Ecosystems and Indigenous Biodiversity	Submitter suggests that in its current draft it does not protect significant habitats of indigenous fauna where they occur outside indigenous vegetation. This is in the context of this Plan not having identified SNAs.	Oppose	Too far reaching on the private landowner and if there are rules to change/protect the native fauna, it could see the wellbeing of the native fauna if management of the land has to change. It could be suggested the reason they are there is because the land management techniques are	Disallow

					aiding in them establishing a habitat. The proposed rule should not even be considered. This does not support FFNZ submission.	
S560.483	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	Ecosystems and Indigenous Biodiversity	Submitter seeks that rules may also need to be included in other chapters to ensure that significant habitats outside of indigenous vegetation are protected.	Oppose	This will have wide reaching effects that the TTPP committee needs to consider. FFNZ strongly urge against this as FFNZ have an interest greater than the general public and would have significant impacts on our members.	Disallow
S560.503	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	Ecosystems and Indigenous Biodiversity	Seeks to add a new Discretionary rule ECO - R7A.	Neutral	FFNZ have an interest greater than the public in this. FFNZ are neither opposed nor in favor. This does complement our submission.	Disallow in part
S560.215	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	Ecosystems and Indigenous Biodiversity	Seeks to consider that separate rules should be used for activities outside of Schedule Four SNAs to those within Schedule Four SNAs. Within the CE even more stringent conditions are required to ensure that the policies direction to avoid adverse effects is achieved.	Strongly Oppose	To treat all indigenous vegetation as an SNA is ridiculous and impractical for farming systems, there needs to be the ability to renew pasture when required. Classification of SNA's could take 10's of years and would cripple the West Coast economy and rural sector. This does not support FFNZ submission.	Disallow

S166.015	New Zealand Agricultural Aviation Association (S166)	Ecosystems and Indigenous Biodiversity	Submitter seeks to delete ECO--R1 5 (i) and (ii) and replace them with: 5. Within the Buller and Westland Districts: Indigenous vegetation clearance where it is within an area of improved pasture.	Support	This supports the position taken in FFNZ submission, and practically understands how the farming systems work.	Allow
S560.484	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	Ecosystems and Indigenous Biodiversity	Seeks alternative relief that includes significant measurement restrictions.	Oppose	Oppose the submitters proposed amendments to ECO-R1, as they do not take into consideration animals and crops requirements as well as drains. It would create unworkable regulation for the rural sector.	Disallow
S538.209	Buller District Council (S538)	Ecosystems and Indigenous Biodiversity	Seeks to amend the heading to Rule 1 to remove the reference to the Coastal Environment.	Support	FFNZ agree that not all clearance should and need consent, there are also basic clearances that are needed for flood mitigation and for the wellbeing of animals and communities on the coast. FFNZ support the amendments sought by the council.	Allow
S608.055	Grey District Council (S608)	Ecosystems and Indigenous Biodiversity	Seek to have activities that have been lawfully established or have an operational need to locate.	Support	Common sense approach taken by Council and follows very similar rules in district plans by councils around the South Island. It enables industry to work with regulation. This supports FFNZ submission.	Allow

S560.496 & S560.500	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	Ecosystems and Indigenous Biodiversity	Seeks that ECO-R5 considers that this rule should be amended to specifically provide for the maintenance and purposes we consider appropriate for ECO-R1 where the limits in that rule are not met.	Oppose in part	Does not take into consideration the need for farm tracks for agricultural operations, FFNZ would see significant amendments to this submitters proposal before support can be granted. This does not support FFNZ submission.	Disallow
S599.060	WMS Group (HQ) Limited and WMS Land Co. Limited (S599)	Ecosystems and Indigenous Biodiversity	Submitter seeks activity status for indigenous vegetation clearance not meeting permitted or controlled activity standards.	Support	Allows for clearance where the activity needs to occur within reason. This is a balance between environmental protection and wellbeing needs. Allows for the interpretation of existing use rights as set out in the RMA. This supports FFNZ submission.	Allow
Natural Features and Landscapes						
S486.032	Horticulture New Zealand (S486)	Natural Features and Landscapes	Seeks to amend NFL-P3 by deleting 'farms' and replacing with 'rural production activities'.	Support	Support the need to change from farms to rural productive activities to be more inclusive. Supports FFNZ submission.	Allow
S602.090	Department of Conservation (S602)	Natural Features and Landscapes	Seeks to amend Policy NFL - P4 and to ensure adverse effects are also managed by limiting landform modification through earthworks.	Oppose	This does not support FFNZ submission, Placing limits on earthworks is unnecessary and are required for structures to ensure they erected correctly and safely.	Disallow

S560.233	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	Natural Features and Landscapes	Submitter seeks to delete permitted and controlled activities and require restricted discretionary consent from NFL-R3.	Oppose	This does not support FFNZ submission, It is appropriate for permitted and controlled activities to be allowed in the NFL. It would not be appropriate to make these activities discretionary or non-permitting.	Disallow
S602.094	Department of Conservation (S602)	Natural Features and Landscapes	Seeks to amend Rule NFL - R6 as imposing no limits for earthworks on infrastructure providers or network utility operators within ONLs and ONFs can have adverse effects on the outstanding values of those areas.	Oppose in part	Pastoral land could be included in the coastal environment so should allow for earthworks. Submission does not consider all activities occurring in the coastal environment. This does not support FFNZ submission.	Disallow in part
S538.00644	Buller District Council (S538)	Natural Features and Landscapes	The submitter seeks that a consistent approach is taken with the rule framework for activities within ONLs and SNAs.	Support	This submission point supports the position taken in FFNZ submission.	Allow
S560.236	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	Natural Features and Landscapes	Seeks to include a standard that requires compliance with the ECO provisions for any associated vegetation clearance.	Oppose	This does not support FFNZ submission. Proposes restrictions on vegetation clearance in line with the ECO chapter which is over regulatory.	Disallow
S602.097	Department of Conservation (S602)	Natural Features and Landscapes	Submitter seeks to oppose Rule NFL - R10 and amend it so that resource consent is required for a restricted discretionary activity, as earthworks that are not	Oppose	This does not support FFNZ submission. Making these activities discretionary seriously reduces the ability to do minor earthworks	Disallow

			sensitively designed and located can have more than minor adverse effects on ONL and ONF values.		needed for animal welfare, farm operations or track maintenance after a natural event. This would have significant impacts on the rural sector.	
Public Access						
S602.099	Department of Conservation (S602)	Public Access	Submitter seeks to delete the Public Access - Te Āheinga Tūmatanui Chapter in its entirety.	Support	This supports parts of FFNZ submission. Public access is well addressed in other areas of the proposed plan. The deletion of the chapter would not affect the proposed public access rules.	Allow
Natural Character and Margins of Waterbodies						
S560.508	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	Natural Character and Margins of Waterbodies	Seeks to have earthworks governed by the ECO chapter.	Oppose	This submission point does not support FFNZ submission and the need for pasture and farm maintenance.	Disallow
S552.095	Buller Conservation Group (S552)	Natural Character and Margins of Waterbodies	Seeks that there should be no development within the margins of waterbodies.	Strongly Oppose	This does not support the position taken in FFNZ submission. There is no reference to where they got this statement from.	Disallow
S608.064	Grey District Council (S608)	Natural Character and Margins of Waterbodies	Seeks to re-worded to give better effect to Objective 7A(2) and Policy 7A(4) of the West Coast RPS.	Support	The submission point supports the position FFNZ have taken in FFNZ submission of development and references the WRPS of which the plan should align with.	Allow

S486.035	Horticulture New Zealand (S486)	Natural Character and Margins of Waterbodies	Seeks to Retain NC-O3.	Support	This supports FFNZ submission.	Allow
S560.247	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	Natural Character and Margins of Waterbodies	Seeks to delate NC - O3.	Oppose	FFNZ argue that activities that have a function need are appropriate activities that provide for the wellbeing of the district. Activities can co-exist and provide natural character to be preserved as well. This does not support FFNZ submission.	Disallow
S560.248	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	Natural Character and Margins of Waterbodies	Seeks to change wording as 'Minimising' adverse effects is not an appropriative approach to effects management.	Support in part	Development has been used too harshly in this submission point; FFNZ seek to change it to 'sustainable development' which is better encompassing to what is already occurring in the district. This supports elements of FFNZ submission.	Allow in part
S486.036	Horticulture New Zealand (S486)	Natural Character and Margins of Waterbodies	Seeks to amend NC-P2 by adding: g) for food production purposes.	Strongly Support	Supports the position taken in FFNZ submission and any additions Hort NZ seek FFNZ support on this point.	Allow
S552.097	Buller Conservation Group (S552)	Natural Character and Margins of Waterbodies	Seeks to add 'subject to regional rules, with' to NC-P2.	Oppose	Regional rules are already being adequately provided for. There is no need for any further additions. This does not support FFNZ submission.	Disallow

S602.105	Department of Conservation (S602)	Natural Character and Margins of Waterbodies	Seeks to strengthen the intent of Policy NC-P2 by replacing 'provide for' with the term 'allow' as this language is enabling and indigenous vegetation removal and earthworks within riparian margins should only be allowed for these activities where the adverse effects can be appropriately managed to protect the natural character of waterbodies and their margins in accordance with Section 6(a) of the RMA.	Oppose	Enable is provided for in the RMA and wording should be consistent with the RMA. FFNZ does not support these amendments as drafted.	Disallow
S450.105	Waka Kotahi NZ Transport Agency (S450)	Natural Character and Margins of Waterbodies	Seeks to add 'operation need' to the policy.	Support	FFNZ support the need for the amendments proposed by this submitter.	Allow
S602.106	Department of Conservation (S602)	Natural Character and Margins of Waterbodies	Seeks to retain NC-P3 as notified.	Support	This supports FFNZ submission.	Allow
S166.017	New Zealand Agricultural Aviation Association (S166)	Natural Character and Margins of Waterbodies	Seeks to retain NC-P4 and add the words:including weed and pestcontrol.	Support	Pest control is important to maintain the natural charter of an area. FFNZ support the inclusion of this submitter's points in the plan.	Allow
S560.042	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	Natural Character and Margins of Waterbodies	Seeks to have vegetation clearance dealt with the ECO chapter.	Strongly Oppose	This does not support the position taken in the plan. As a party that has a greater interest than the public, FFNZ seek relief of this	Disallow

					submission point.	
S560.252	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	Natural Character and Margins of Waterbodies	Submitter seeks to review all rules in this chapter to remove duplications for natural wetlands rules in NESFM. Include rules to protect all other wetlands meeting the RMA definition of wetland, which are not covered by 'natural wetlands'.	Oppose	Would this capture engineered wetlands which would have significant effects on the ability to manage those waterbodies? Clarity is needed here from the submitter. Does not support FFNZ submission.	Disallow
S486.037	New Zealand Agricultural Aviation Association (S166)	Natural Character and Margins of Waterbodies	Seeks to amend NC-R1 by adding to 1: k) Food production purpose l) Biosecurity purposes.	Support	This supports FFNZ submission.	Allow
S552.099	Buller Conservation Group (S552)	Natural Character and Margins of Waterbodies	Seeks to delete the rule.	Strongly Oppose	The statement clearly shows they don't understand the need to fence off riparian margins. Their statement is factually incorrect. This does not support FFNZ submission.	Disallow
S552.218	Buller Conservation Group (S552)	Natural Character and Margins of Waterbodies	Seeks to have riparian margins that are vested with LINZ as hydro.	Strongly Oppose	This does not support FFNZ submission, and is important to respect private land, especially in rural remote areas of the district for health and safety purposes.	Disallow

S438.111	Manawa Energy Limited (Manawa Energy) (S438)	Natural Character and Margins of Waterbodies	Seeks to have the rule amended to have 'operational need added'.	Support	Supports the need for structures to be there that have a functional need, such as a pumphouse. This supports FFNZ submission.	Allow
S560.254	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	Natural Character and Margins of Waterbodies	Seeks to delete or amend as discretionary.	Oppose in part	This submission point does not support FFNZ submission. Health and Safety and Natural Charter can co-exist to make the activity discretionary is not appropriate and have unintended consequences.	Disallow
S602.108	Department of Conservation (S602)	Natural Character and Margins of Waterbodies	Submitter seeks to oppose Rule NC-R2 and amend it as a number of these activities can all have adverse effects on the environment that should be assessed through a resource consent application so appropriate conditions can be imposed if required, and the application can be declined if adverse effects are significant and/or the application is contrary to the provisions of the statutory documents.	Oppose	This does not support FFNZ submission. Failure to understand the need to have these activities permitting for the wellbeing and health and safety of peoples and animals.	Disallow
S560.256	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	Natural Character and Margins of Waterbodies	Seeks to support at least a discretionary consent requirement for all works in riparian margins, only insofar as: - this doesn't duplicate, or is more stringent than NESFM rules.	Neutral	Although it is important that the NESFM rules are in the proposed plan, it is important that these do not unintentionally capture riparian margins not on waterways. Clarity is needed in this rule.	Disallow in part

Subdivision						
S566.195	Chris J Coll Surveying Limited (S566)	Subdivision	Seeks to add a new policy that supports rural zones.	Support	This submission point supports FFNZ submission, it is important that subdivisions in rural zones keeps the amenity values.	Allow
S486.041	Horticulture New Zealand (S486)	Subdivision	Seeks to amend SUB-P6 by adding: g) In the RURZ of highly productive land except as provided for in the NPSHPL. Subdivision in rural environments needs to take into account the NPSHPL.	Support	This supports FFNZ submission	Allow
S558.196	Chris & Jan Coll (S558)	Subdivision	Seeks to Delete the wording of this policy and reformulate to reflect the wording of the operative Buller District Plan.	Support in part	FFNZ don't believe this policy should be deleted instead reworded to ensure that landowners are not required to get consent to undertake such an activity and it is permitting to protect the conservation values of the land. It is important to also make sure that the proposed changes do not follow just Buller District, but the whole WC.	Allow in part
S560.043	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	Subdivision	Seeks rules more stringent covered in the ECO chapter.	Oppose	More stringent rules on riparian margins will have unintended consequences for rural landowners on the fringes of urban settlements. FFNZ don't support this approach, or support FFNZ	Disallow

					submission.	
S358.003	Garry Howard (S358)	Subdivision	Seeks to change Controlled Activity Minimum Lot Size for subdivision General Rural Zone from 4ha to 4000sqm.	Support	Support the position taken in this submission, it understands the practicality of the farming and impracticality of bad subdivision rules.	Allow
S560.268	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	Subdivision	Seeks to amend Condition 1 Where: 1. an ecological assessment shows This is not within a Significant Natural Area, or an SNA as identified in Schedule Four, and subject to Rule SUB - R7;	Strongly oppose	This does not support FFNZ submission, SNA's should be identified by the council and there should be no need for an ecological assessment, it is just not practical and creates unjust regulation.	Allow
S478.022	Frank and Jo Dooley (S478)	Subdivision	Seeks to amend to Minimum Lot Sizes for Each Allotment Standard 1 (g) to provide for the minimum allotment size of the Rural Lifestyle zone of 4,000 m ² .	Support	This supports FFNZ submission.	Allow
General District Wide Matters -						
Coastal Environment						
S550.004	Westland Farm Services (S550)	Coastal Environment	Seeks to retain as notified.	Support	This supports FFNZ submission.	Allow
S486.044	Horticulture New Zealand (S486)	Coastal Environment	Seeks to retain CE-P4 as notified.	Support	This supports FFNZ submission	

S560.284	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	Coastal Environment	Seeks that the plan should include provision for lawfully established primary production activities. However, there may need to be consideration for activities that are having cumulative effects on an outstanding or high value areas.	Oppose in part	This does not support elements of FFNZ submission. FFNZ do feel that some activities can protect the values of an environment and do not support the amendments. Retain as notified.	Disallow in part
S602.146	Department of Conservation (S602)	Coastal Environment	Submitter seeks to support Policy CE-P4 and amend it so that primary production buildings and structures do not degrade the elements, patterns or processes that contribute to the outstanding or high values, and to ensure adverse effects on outstanding values are avoided in accordance with Policies 13 and 15 of the NZCPS.	Oppose	This does not support FFNZ position as it currently stands. The direction DOC has gone in this submission point is concerning. They have a failure to understand that because of those farming techniques it has preserves those high coastal values.	Disallow
S560.534	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	Coastal Environment	Seeks to amend That provision for minor upgrades on the National Grid may be appropriate at the permitted level given the distinction from other upgrades under the NPS for ET, but that other upgrades for infrastructure more restricted requirements as for new activities should apply.	Oppose in part	This opposes elements of FFNZ submission. The need to maintain tracks on farms is an important part of farm renewals and should be a permitted activity. Any new activity should not be more restrictive than previously without reason.	Disallow

S560.0537	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	Coastal Environment	Seeks to amend the activity status where compliance is not achieved is Restricted discretionary or discretionary and refer to specific rules where possible.	Oppose in part	This does not support FFNZ submission. Existing use rights are applied here and can't be made restricted discretionary. It is a permitted activity to replace an existing structure.	Disallow in part
S486.045	Horticulture New Zealand (S486)	Coastal Environment	Seeks to retain CE-R4 as notified.	Support	This supports FFNZ submission.	Allow
S538.291	Buller District Council (S538)	Coastal Environment	Seeks to amend Rule 4 from 200-300 m squared.	Support in part	This supports elements of FFNZ submission. FFNZ support the practical need to increase the floor footage, but still believe that 500 is more adequate for a farm structure and building.	Allow in part
S602.150	Department of Conservation (S602)	Coastal Environment	Submitter seeks to amend Rule CE-R4 to introduce an additional setback rule so that all buildings and structures are appropriately set back from the CMA, and to require resource consent where they are not, so the adverse effects can be assessed. Amend the rule to refer to 'overlay areas' rather than a detailed list as this simplifies the rule and ensures that no overlay areas are inadvertently excluded. Remove energy, natural hazard mitigation and network utilities from the permitted activity list, as all activities,	Support in part	This supports elements of FFNZ submission. Do agree with the setback, but existing use rights should prevail in the proposed amendment of this rule.	Allow in part

			regardless of their type, should comply with the rule.			
S538.310	Buller District Council (S538)	Coastal Environment	Seeks that that careful consideration is given to any individual submissions regarding the accuracy of the Coastal Environment boundary.	Support	This supports FFNZ submission. Agree with the council that much of the land from the coast is highly modified rural production land that would be placed under unnecessary restrictions. The map should be reworked to avoid unintentionally capturing these areas.	Allow
S538.292	Buller District Council (S538)	Coastal Environment	Seeks to amend Rule 5 from 100 to 150 m squared. We support the need to increase the floor area from 100 to 150 meters squared. It's practical for the type of activity occurring in the zone.	Support	FFNZ support the need to increase the floor area from 100 to 150 meters squared. It's practical for the type of activity occurring in the zone.	Allow
S602.151	Department of Conservation (S602)	Coastal Environment	Submitter seeks to amend Rule CE-R5 to introduce an additional setback rule so that all buildings and structures are appropriately set back from the CMA, and to require resource consent where they are not, so the adverse effects can be assessed. Amend the rule to refer to 'overlay areas' so the rule is consistent with CE-R4.	Oppose	This does not support FFNZ submission. Over prescriptive and unintentionally captures structures that are already in the zone. There are also some properties that exclusively exist in the zone and would not allow them to sustainably develop.	Disallow

S560.295	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	Coastal Environment	Seeks to combine CE - R9 into R6 and as a consequence delete CE - R9.	Oppose	This does not support FFNZ submission. Does not understand the functional need for maintenance and renewal in a farming operation, would have significant effects on the wellbeing of the sector.	Disallow
S560.296	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	Coastal Environment	Seeks that maintenance is given effect in R1 and seeks relief of that to be more stringent.	Strongly Oppose	This does not support FFNZ submission. Fence and farm track maintenance within the overlay is important and deleting it is concerning and something we cannot support. It is important that maintenance is given effect to this rule for consistency across the plan.	Disallow
S602.153	Department of Conservation (S602)	Coastal Environment	Seeks to amend CE-R7 subject to amendments to ensure that the rules apply to existing access and structures, align the rule with similar submission points DOC has made in the Natural Features and Landscapes Chapter, and introduce additional limits for earthworks within 30m of the CMA as the potential adverse effects of earthworks on high natural character is greater the closer earthworks are to the CMA.	Oppose	This does not support FFNZ submission. Places unnecessary regulation on existing use rights for renewal. It is important that adequate protection is given for renewal as it allows for the health and safety of stock, while keeping pests bay.	Disallow

S560.0568	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	Coastal Environment	Seeks to amend permitted rules should also be crafted to ensure that adverse effects on the environment as a result of a permitted activity would be no more than minor.	Oppose	This does not support FFNZ submission, Would have premise effects on the farming operations on the coast and would be restrictive on any agricultural operations. Excavation may be needed for renewal or health and safety aspects of farming.	Disallow
S602.156	Department of Conservation (S602)	Coastal Environment	Seeks to amend Rule CE-R10 and amend it so the rule enables smaller permitted agricultural structures to be established to preserve and protect outstanding natural character and landscape values in accordance with Policies 13 and 15 of the NZCPS.	Strongly Oppose	Failures to understand the practical requirements of the agricultural sector on the coast. FFNZ oppose the amendments to this rule.	Disallow
Earthworks						
S560.313	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	Earthworks	Submitter seeks to amend the overview to "Vegetation will often cover the area to be affected by earthworks. Where that is the case, the earthworks must also comply with the vegetation clearance rules and other provisions in the ECO chapter. This EW chapter does not manage the effects on vegetation, so the Eco chapter must also apply."	Oppose	This does not support FFNZ submission. Having Earthworks comply with the ECO chapter is too prescriptive, especially with many SNA's yet to be mapped!	Disallow

S538.312	Buller District Council (S538)	Earthworks	Seeks retain as notified. Objective EW-O1 Policies EW P1 - P4.	Support	This supports FFNZ submission.	Allow
S608.084	Grey District Council (S608)	Earthworks	Seeks to the plan needing to therefore needs to take an enabling approach to Earthworks.	Support	Agree with the submitter that there needs to be more enabling terminology used. Easier to understand for the public.	Allow
S560.317	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	Earthworks	Seeks to amend 'Minimising' effects is not an appropriate standard. Effects could still be significant, even where they are minimised.	Oppose	This does not support FFNZ submission. Not enabling terminology proposed. FFNZ seeks to retain it as notified without amendments.	Disallow
S486.047	Horticulture New Zealand (S486)	Earthworks	Retain EW-R1 as notified.	Support	This supports FFNZ submission.	Allow
S608.085	Grey District Council (S608)	Earthworks	Seeks that Earthworks are an essential part of a building process.	Support in part	This supports FFNZ submission. Support the need for a consent for 2m of a building within an urban zone. FFNZ do not support this rule being a blanket rule for all WC zones.	Allow in part
S486.049	Horticulture New Zealand (S486)	Earthworks	Retain EW-R3 as notified.	Support	This supports FFNZ submission.	Allow
S538.316	Buller District Council (S538)	Earthworks	Seeks to increase the size of a permitted activity in Rural Lifestyle increased from 500 to 2500 m squared.	Support	Support the need to increase the maximum earthworks in a rural lifestyle zone as the current was too restrictive.	Allow
S560.320	Royal Forest and Bird Protection Society of New	Earthworks	Seeks to add a limit to earthworks.	Oppose	This does not support FFNZ submission. Too restrictive as proposed and does not	Disallow

	Zealand Inc. (Forest & Bird) (S560)				consider the need for greater activity for the agricultural sector.	
S560.325 & S560.326	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	Earthworks	Seeks to have vegetation clearance associated with the ECO chapter.	Oppose	This does not support FFNZ submission. Too restrictive on the landowner and does not take into consideration the characteristics of every zone.	Disallow
Light						
S441.028	Silver Fern Farms Limited by its authorised agents Mitchell Daysh Limited (S441)	Light	Seeks to retain Light – 01 as notified.	Support	This submission point supports the position taken in FFNZ submission in relation to the need for industrial light on the rural setting for health and safety purposes.	Allow
S441.029	Silver Fern Farms Limited by its authorised agents Mitchell Daysh Limited (S441)	Light	Submitter disagrees with the requirement to not affect views of the night sky in industrial zones, where substantial lighting commensurate with 24/7 operations is necessary. Silver Fern Farms questions how resource users will comply with the requirement to "...not adversely affect the habitats and ecosystems of nocturnal native fauna and the species themselves.	Support	Support the submission points raised by the submitter and recognize that this somewhat aligns with FFNZ submission.	Allow

S441.030	Silver Fern Farms Limited by its authorised agents Mitchell Daysh Limited (S441)	Light	Submitter seeks Retain policy as notified subject to the following amendment to sub-paragraph (b) b. Maintains the character and amenity values of the zone and surrounding area;	Support	Support the submission points made here and support the position taken in FFNZ submission for the practical needs of the rural communities.	Allow
S560.330	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	Light	Submitter seeks to delete a. of LIGHT-P2.	Oppose	This does not support FFNZ submission. Failure to understand the needs of the rural communities, especially for harvesting.	Disallow
S441.031	Silver Fern Farms Limited by its authorised agents Mitchell Daysh Limited (S441)	Light	Submitter seeks Artificial outdoor lighting is important for managing health and safety requirements for Site operations, as such, Silver Fern Farms consider a further sub-clause should be included to highlight the need for artificial outdoor lighting for health and safety purposes. Furthermore, existing and future operations of the existing plant (including artificial outdoor lighting) will likely compromise the character and amenity values of the proposed GRZ and GRUZ and will give rise to reverse sensitivity effects for the Plant.	Support	This supports FFNZ submission. Support the need for light for health and safety purposes depending on the zone. It is important for the wellbeing of the rural community that they are able to operate under sufficient light in order to not put themselves or others at risk of a health and safety incident.	Allow

S538.324	Buller District Council (S538)	Light	Support the need for adequate Lux required for lights in the Rural Zones in order to operate in a safe manner on their properties.	Support	This supports our submission.	Allow
S538.327	Buller District Council (S538)	Light	Submitter seeks the lighting rules are too prescriptive for the low level of development in the District and Region.	Support	This supports FFNZ submission.	Allow
Noise						
S486.055	Horticulture New Zealand (S486)	Noise	Retain NOISE-01 as notified.	Support	This supports FFNZ submission.	Allow
S166.021	New Zealand Agricultural Aviation Association (S166)	Noise	Retain NOISE-02 as notified.	Support	This supports FFNZ submission.	Allow
S345.002	Ballance Agri-Nutrients (S345)	Noise	Retain NOISE-02 as notified.	Support	This supports FFNZ submission.	Allow
S441.037	Silver Fern Farms Limited by its authorised agents Mitchell Daysh Limited (S441)	Noise	Seeks to make practical amendments to NOISE-03.	Support	This submission point supports the position taken in FFNZ submission and recognizes the need for noise in the rural zone in order to operate at certain times of the year in a safe manner.	Allow
S486.057	Horticulture New Zealand (S486)	Noise	Seeks to amend NOISE-P2 to include GRUZ as a higher noise environment.	Support	This supports FFNZ submission.	Allow
S486.058	Horticulture New Zealand (S486)	Noise	Seeks to Amend NOISE-P4 by replacing 'protect' with 'provide	Support	This supports FFNZ submission.	Allow

			for'.			
S486.087	Horticulture New Zealand (S486)	Noise	Rural environments are working rural production areas and should not be portrayed as quiet. Noise does occur in those areas, sometimes on an intermittent basis. Ensuring adequate setbacks of dwellings from horticultural properties is an important part of minimising the potential for reverse sensitivity complaints.	Support	This submission point supports FFNZ submission and specifically that noise should be a 7 day 24 hours of a day activity when and where required to ensure the sector can cater for its demands in a safe manner.	Allow
S486.059	Horticulture New Zealand (S486)	Noise	Submitter seeks to amend NOISE-R2 11) by replacing 'agricultural, horticulture and pastoral farming activities' with 'rural production activities'. Retain NOISE-R2 12) Retain NOISE-R2 16) Include a definition for 'audible bird scaring device' as: ' <i>Gas guns and avian distress alarms used for the purposes of disturbing or scaring birds</i> '.	Support	This supports FFNZ submission.	Allow
S486.060	Horticulture New Zealand (S486)	Noise	Submitter seeks to amend NOISE-R6 1) a) and b) by deleting specified days of the week 7.00am to 10.00pm: 55dB LAeq(15 mins) 10.00pm to 7.00am: 45dB LAeq(15 mins) 10.00pm to 7.00am all days: 75 dB LAFmax.	Support	This supports FFNZ submission.	Allow
Zones						
Rural Zone – Objectives and Policies						

S552.036	Buller Conservation Group (S552)	Rural Zones	Seeks to extracts around the use of agrichemicals.	Strongly Oppose	Does not support the position taken in FFNZ submission, it lacks any clarity on how big the operation needs to be, is it a backpack sprayer etc? Does that also mean sprays used in other zones need to hold certificates as well in order to spray weeds around a residential garden? Totally impractical and not used in any other plan around the country.	Disallow
S488.037	West Coast Regional Council (S488)	Rural Zones	Submitter seeks to put the pTTPP HPL provisions on hold and undertake consultation with affected landowners.	Support	This supports FFNZ submission. FFNZ support the need to pause the implementation of these rules until proper consultation has been undertaken with affected landowners who may not be aware of the consequences.	Allow
S560.0543	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	Rural Zones	Seeks to have vegetation clearance dealt with in the ECO chapter.	Strongly Oppose	This does not support FFNZ submission. Vegetation clearance is needed for pasture renewals and should have its own set of rules in the rural zone, not being incorporated into the ECO chapter. Failure to understand the farming systems that are occurring on the coast.	Disallow

S560.374	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	Rural Zones	Submitter seeks to include a new policy requiring the maintenance and protection of natural values in these zones.	Oppose in part	This does not support FFNZ submission. Natural values are already protected through sustained agriculture practices, many of these values are protected from the agriculture practice being used in the environment.	Disallow
S489.003	Rural Contractors New Zealand Incorporated ("RCNZ") (S489)	Rural Zones	Submitter seeks to include the important of the agricultural industry in the overview policy.	Support	This supports FFNZ submission.	Allow
S552.172	Buller Conservation Group (S552)	Rural Zones	Submitter seeks to make amendments to the 3 rd paragraph of the overview.	Oppose	This does not support FFNZ submission. Struggled to understand how mineral extraction sites can be seen as commuter sites? We seek relevance to this chapter. Retain as notified.	Disallow
S166.028	New Zealand Agricultural Aviation Association (S166)	Rural Zones	Seeks to include the NES-PF applies to forestry activities in rural areas. However, the NES-PF does not include provisions relating to the use of aircraft so forestry production activities need to be explicitly included in provisions for agricultural aviation activities to enable the use of aircraft for forestry production purposes.	Support	This supports FFNZ submission.	Allow

S486.062	Horticulture New Zealand (S486)	Rural Zones	Submitter seeks to include a new objective should be included to give effect to the NPSHPL.	Support	FFNZ supports the need for the plan to give effect to the NPSHPL. Supports FFNZ submission.	Allow
S608.107	Grey District Council (S608)	Rural Zone	Submitter seeks to add a new objective: The General Rural Zone is managed to ensure its availability for primary production activities and its long-term protection from being compromised by reserve sensitivity.	Support	This supports FFNZ submission. Support the need for protection of the rural zone long term from the effects of reverse sensitivity.	Allow
S486.061	Horticulture New Zealand (S486)	Rural Zone	Submitter seeks to amend RURZ-O1 to more enabling terminology.	Support	Support the need to be able to enable the rural zone and does need to take into consideration the NPS requirements as well. Supports FFNZ submission.	Allow
S486.064	Horticulture New Zealand (S486)	Rural Zone	Seeks to move RURZ-O3 to SETZ-O1.	Support	This supports FFNZ submission.	Allow
S456.048	Ministry of Education Te Tāhuhu o Te Mātauranga (S456)	Rural Zone	Seeks to include rural education set out in the policies.	Support	FFNZ support the need to support our rural communities for proper and adequate educational facilities for our youth. Supports FFNZ submission.	Allow
S608.108	Grey District Council (S608)	Rural Zone	Submitter seeks to add two additional policies to enable and protect Primary Production on the West Coast.	Support	This supports FFNZ submission. FFNZ support policies that are enabling for one of the largest employees and industry on the coast, to protect the wellbeing on the	Allow

					peoples on the coast	
S166.030	New Zealand Agricultural Aviation Association (S166)	Rural Zone	Seeks to explicitly outline in the policy that the activity needs to match the environment they will be operating. Amend RURZ-P1 by adding: g) Be consistent with the level of noise and odour from rural production activities.	Support	This supports FFNZ submission. Support the need for the industry to be enabled to engage in activities that are of character of the zone. FFNZ support the amendments proposed.	Allow
S486.066	Horticulture New Zealand (S486)	Rural Zone	The submitter seeks that terminology is in line with the NPS for Planning.	Support	This supports FFNZ submission	Allow
S602.229	Department of Conservation (S602)	Rural Zone	Submitter seeks to ensure growth and change does not compromise natural and cultural landscapes.	Neutral	Concerned about the restrictions on sustainable development of the Rural Zone and would like to see engagement with landowners and iwi on this proposed amendment. Retain as notified.	Disallow in part
S345.008	Balance Agri-Nutrients (S345)	Rural Zone	Seeks to retain policy as notified.	Support	This supports FFNZ submission. Agree that rural production should not conflict with the rural lifestyle.	Allow
S486.067	Horticulture New Zealand (S486)	Rural Zone	Seeks to amend RURZ-P4 by replacing 'rural production values' with rural production	Support	This supports FFNZ submission.	Allow

			activities.'			
S486.068	Horticulture New Zealand (S486)	Rural Zone	Submitter seeks RURZ-P5 provides for highly productive land which is supported. The policy should give effect to the NPSHPL and amendments are sought for this.	Support	This supports FFNZ submission. The plan should follow the NPSHPL.	Allow
S486.069	Horticulture New Zealand (S486)	Rural Zone	Submitter seeks that an activity may relocate to the rural zone if there is a function need there.	Support	This supports FFNZ submission. Agree that if non-rural activities are re-located to the rural zone that they do not create adverse effects of reverse sensitivity on the zone.	Allow
S605.026	Paparoa Track Services Ltd, Craig and Sue Findlay, Tim Findlay, Punakaiki Beach Camp Ltd (S605)	Rural Zone	Seeks to retain as notified.	Support in part	We agree that the rural sector is an important part of the tourism economy for the coast.	Allow
S345.009	Ballance Agri-Nutrients (S345)	Rural Zone	Seeks to retain policy as notified.	Support	This supports FFNZ submission.	Allow
S486.070	Horticulture New Zealand (S486)	Rural Zone	The submitter seek to change the policy for reverse sensitivity but considers that use of the defined term 'lawfully established activities' who be more appropriate rather than 'existing rural uses and	Support	This supports FFNZ submission.	Allow

			consented activities'			
S166.032	New Zealand Agricultural Aviation Association (S166)	Rural Zone	This submitter seeks to provide for rural airstrips as part of agricultural activities.	Support	This supports FFNZ submission.	Allow
S345.011	Ballance Agri-Nutrients (S345)	Rural Zone	Submitter seeks to make sure that airstrips are put in practical locations and not restricted by rural settlements.	Support	This supports FFNZ submission.	Allow
S166.034	New Zealand Agricultural Aviation Association (S166)	Rural Zone	Submitter seeks to enable rural aircraft work and also that of conservation activities.	Support	This supports FFNZ submission, aviation plays a significant role in conservation on the WC. FFNZ supports the amendments.	Allow
S560.380 & S560.382	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	General Rural Zone	Seeks to include ecological assessment for all mining activities and any clearances dealt with the ECO chapter.	Oppose	This does not support our submission	Disallow
S488.028	West Coast Regional Council (S488)	General Rural Zone	Important to provide for biosecurity and biodiversity needs operationally in the plan for key stakeholders.	Support	This supports the position taken in our submission	Allow
S560.017	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	General Rural Zone	Farm quarries are an integral part of the farms operations and for restrictions to be placed on them further, with many already having significant overlays with other zones is too restrictive and would have significant health and safety	Oppose in part	This does not support FFNZ position take in the submission and creates unjust regulations that are already covered in the chapter.	Disallow in part

			outcomes for farm safety.			
S560.381	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	General Rural Zone	Submitter seeks to acknowledge the presence of indigenous vegetation and habitats of native species interspersed in the GRUZ landscape.	Oppose in part	This does not support FFNZ submission. FFNZ acknowledge that there may be some native vegetation that occasionally is found on farm and can provide occasional habit for native fauna. However, we do not agree with the terminology used in the proposed amendments. Much of the native flora and fauna would not be there without the farm management plans that are being used. Retain as notified.	Disallow in part
S296.003	Riarnne Klempel (S296)	General Rural Zone	Submitter seeks to ensure greater regulation of large-scale industry.	Oppose	This does not support FFNZ submission. This submission does not support the position that has been taken in our submission, there are many discrepancies and incorrect statements. A herd size of 500 is relatively small and herd numbers across the country are declining. FFNZ ask for relevance to the proposed plan.	Disallow
S67.005	Riarnne Klempel (S67)	General Rural Zone	Submitter seeks to ensure that intensive farming operations should not be able to locate near to cemeteries.	Oppose	This does not support FFNZ submission. The cemetery is in a general rural zone and has been done so for many years. Farming around the	Disallow

					cemetery in its current capacity is permitted and should continue to do so. FFNZ yet to understand the statement of proposed negative effects from being in proximity to a rural cemetery.	
S486.075	Horticulture New Zealand (S486)	General Rural Zone	The submitter seeks that the rural production activities are separated from buildings in the GRUZ. Such an approach would make a clear differentiation between the different activities.	Support	This supports FFNZ submission. Worker accommodation is important to retain workers in manner that enables the zone.	Allow
S560.383	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	General Rural Zone	Farm quarries are an integral part of the farming operations. They allow for renewals on farm, rather than having to bring in from elsewhere with significant cost attached.	Strongly Oppose	This does not support our submission	Disallow
S560.383	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	General Rural Zone	Seeks to remove quarrying from the rule.	Oppose	This does not support FFNZ submission. Farm quarries are important to farm operations, especially for renewals of tracks.	Disallow
S166.037	New Zealand Agricultural Aviation Association (S166)	General Rural Zone	Retain the rule as notified.	Support	This supports FFNZ submission.	Allow
S486.078	Horticulture New Zealand (S486)	General Rural Zone	Seeks to remove 'building' from the rule as worker accommodation.	Support	This supports FFNZ submission.	Allow

S538.499	Buller District Council (S538)	General Rural Zone	Seeks to have 2 units on site for accommodation in the HPL within 4 ha.	Support	This supports FFNZ submission.	Allow
S486.079	Horticulture New Zealand (S486)	General Rural Zone	Seeks that building not associated with the rural production zone be deleted.	Support	This supports FFNZ submission, ensures consistency across the plan.	Allow
S552.184	Buller Conservation Group (S552)	General Rural Zone	Submitter seeks to add an additional clause, as the submitter has concerns about animal and environment welfare in relation to factory farming.	Oppose	This does not support FFNZ submission. Factually incorrect statement and does not align with our submission. Animal Welfare is the top priority of every farmer who we represent.	Disallow
S560.387	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	General Rural Zone	Seeks to add conditions to indoor primary production.	Oppose	This does not support FFNZ submission. Failures to understand the actual operations of an 'intensive indoor primary production'. What is proposed is overly restrictive and places the inability to develop private property, especially in the rural areas.	Disallow
S486.080	Horticulture New Zealand (S486)	General Rural Zone	Submitter seeks to provide for small scale rural industry in the GRUZ as a Permitted Activity.	Support	This supports FFNZ submission.	Allow
S486.082	Horticulture New Zealand (S486)	General Rural Zone	Submitter seeks to delete GRUZ-R24 and amend GRUZ-R30 by deleting 'or restricted discretionary activity standards'.	Support	This supports FFNZ submission.	Allow

S552.185	Buller Conservation Group (S552)	Rural Lifestyle Zone	Submitter seeks to have a cap on dairy and other intense rural production.	Oppose	This does not support FFNZ submission. FFNZ asks for relevance to chapter.	Disallow
S538.529	Buller District Council (S538)	Rural Lifestyle Zone	Submitter seeks to amend R1 to allow for the following Shelters and buildings used to house or feed livestock must be setback at least 30m from any boundary.	Support in part	This somewhat supports FFNZ submission. While FFNZ support the setback, there needs to be inclusion of stock yards and farm quarries. Clarity needs to be given why stock yards have not been included in the plan.	Disallow in part
S538.531	Buller District Council (S538)	Rural Lifestyle Zone	Submitter seeks 1 unit per 1ha of land in the zone.	Oppose in part	This does not support FFNZ submission, it does not allow for the creation of business to cater for the growing tourism industry. 1 ha is a reason size site to cater for two dwellings if needed.	Disallow in part
Planning Maps and Overlays						
S473.011	Katherine Gilbert (S473)	Planning Maps and Overlays	Submitter seeks to have Public Conservation Land (PCL) is not clearly distinguishable from other land, nor does it appear to have been consistently zoned in the One Plan.	Support	This supports FFNZ submission. FFNZ support the inclusion of Public Conservation land that is clearly distinguishable for the general public to see where the land starts and stops, as much as 80% of the coast is under the control of the Department.	Allow

S538.087	Buller District Council (S538)	Planning Maps and Overlays	Submitter seeks that road reserve boundaries are added to the maps as this is often helpful information when assessing how proposals interact with road reserve.	Support	This supports FFNZ submission.	Allow
S560.033	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	Planning Maps and Overlays	Submitter seeks to a. Fix the map tool information so that all property information (i.e., zones and overlays) can be identified even when an address is not available. b. Add functionality to the map tool to enable individual special purpose zones to be selected.	Support	This supports FFNZ submission. FFNZ support the need to rework the online tool to allow for property owners to easily search their properties to fully understand the implications to their land.	Allow
S620.004	Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	Planning Maps and Overlays	Submitter seeks that it is critical that the names of overlays are used consistently throughout the plan and maps.	Support	This supports FFNZ submission. FFNZ support the need to have clarity in consistency of names used across the maps.	Allow
S620.013	Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	Planning Maps and Overlays	Submitter seeks that the legal boundaries for the properties and have the relevant information able to be selected.	Support	This supports FFNZ submission. Maps need to show the legal boundaries, so landowners are able to understand the layers on their properties.	Allow
S444.013	Clare Backes (S444)	Planning Maps and Overlays	Submitter seeks to identify public conservation land in the maps, and ensure it all falls under the Natural Open Space Zone.	Oppose in part	This does not support FFNZ submission. Putting all DOC land under Natural Open Spaces is not sensible as DOC leases out a significant portion of their land to lease holders and it would affect the ability for them to live on	Disallow in part

					that land.	
S488.011	West Coast Regional Council (S488)	Planning Maps and Overlays	Submitter seeks that the pTTPP HPL Precincts should be scientifically reviewed by the four West Coast Councils.	Support	This supports FFNZ submission. Important that HPL is classified and protected from development that could be detrimental to the rural sector. As agriculture is the biggest sector on the coast it is important that land is done by scientific basis.	Allow
S560.013	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	Planning Maps and Overlays	Submitter seeks to rezone all public conservation land to Natural Open Space Zone (NOSZ) and update the Planning maps to reflect this.	Oppose in part	This does not support FFNZ submission. Would capture land that is leased by DOC, this should be avoided or mapped actual conservation land and conservation land leased.	Disallow in part
S560.022	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	Planning Maps and Overlays	Submitter seeks to provide special permissive zoning for activities that are inconsistent with how other activities are provided for within and across various zones.	Oppose	This does not support FFNZ submission, and creates unjust rules on the landowners/users.	Disallow
S560.359	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	Planning Maps and Overlays	Submitter seeks that all public conservation land be NOSZ This does not support the position taken in our submission.	Oppose	This does not support FFNZ submission. Would capture land that should not be zoned under the open spaces, and land that is leased by DOC with conservation values.	Disallow
S612.114	Toka Tū Ake EQC (S612)	Hazards	Submitter seeks to ensure that the Flood Severe and Flood Susceptibility overlays are	Support	This supports FFNZ submission. Make sure the	Allow

			inconsistent with the rest of New Zealand, that there needs to be consistency.		maps are consistent with the direction the rest of New Zealand has taken to ensure consistency across the whole country.	
S488.013	West Coast Regional Council (S488)	Sites and Areas of Significance to Māori Maps	Submitter seeks that the Sites and Areas of Significance to Maori need to be confirmed and the mapping of boundaries corrected.	Support	This supports FFNZ submission. FFNZ support the need for mana whenua to engage with local landowners to develop boundaries around the SASMs and the best order to protect those sites through mutually agreed management plans.	Allow
S608.839	Grey District Council (S608)	Sites and Areas of Significance to Māori Maps	Seeks to remove the Overlays, review/reassess, check for accuracy and apply to the properties that they relate to only.	Support	This supports FFNZ submission. FFNZ agree that the overlays should be reviewed, removed, and mapped in a more accurate fashion in order to protect site specific areas and not vast areas that may have little to no significance, this would remove burdens on ratepayers.	Allow
S560.492	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	Ecosystems and Biodiversity Maps	Seeks to add to the online map layers the Environment Classification areas of relevance.	Oppose in part	This does not support FFNZ submission. FFNZ seek more clarification from Forrest and Bird on the proposed Threatened Environment Classification, and examples where this is used elsewhere in the country.	Disallow in part

S608.840	Grey District Council (S608)	Ecosystems and Biodiversity Maps	Seeks to remove the Overlays, review/reassess, check for accuracy and apply to the properties that they relate to only.	Support	This supports FFNZ submission. FFNZ support the need to have these maps reassessed and accuracy pinpointed to avoid any map leakage into areas that don't need to be classified.	Allow
S608.843	Grey District Council (S608)	High Natural Character	Seeks to remove the Overlays, review/reassess, check for accuracy and apply to the properties that they relate to only.	Support	This supports FFNZ submission. Agree that overlays should be removed and reassessed and applied to properties that are affected.	Allow
S608.844	Grey District Council (S608)	Outstanding Natural Character	Submitter seeks to remove the Overlays, review/reassess, check for accuracy and apply to the properties that they relate to only.	Support	This supports FFNZ submission. Agree that overlays should be removed and reassessed and applied to properties that are affected.	Allow
ENDS						

