

## FURTHER SUBMISSION ON PROPOSED TE TAI O POUTINI PLAN (TTPP)

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### SUBMITTER DETAILS

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**Further Submitter Name:** Davis Ogilvie & Partners Ltd

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**Further Submitter Qualifier:**

A person who has an interest in the proposal that is greater than the interest the public has.

**Qualifying Reason:**

Davis Ogilvie and Partners Ltd (Davis Ogilvie) are a multi-disciplinary consultancy company who prepare a wide range of resource consent applications on behalf of our clients across the West Coast and Buller. Davis Ogilvie made a submission (S465) on the Proposed Te Tai o Poutini Plan (TTPP).

We do wish to speak to this further submission.

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

This further submission relates to multiple submission points as set out in the Table attached as **Appendix 1**; where there are multiple submissions on a proposed provision in the TTPP, a representative further submission has been made rather than submitting on every individual submitter and/or submission point.

Signed:



**PAULINE HADFIELD**  
**DAVIS OGILVIE & PARTNERS LTD**  
Senior Planner, Assoc.NZPI

**APPENDIX 1 – FURTHER SUBMISSION DETAILS**

Original Submitter	Plan Section	Plan Provision	Submission Point/s	Position on Original Submission	Allow, Amend or Disallow	Details/Comment
Department of Conservation (S602)	Whole plan	Whole Plan	S602.005 S602.006 S602.008	Support	Allow	We agree that the TTPP should be consistent in its application of words and terminology. We agree that "Indigenous" should replace "native;" "adverse effects" should replace "impacts;" and "river" and/or "waterbody" should replace "stream" or "waterway" throughout the TTPP. We also consider that a definition of "indigenous vegetation" should be included to ensure clarity when determining when the rules relating to indigenous vegetation should apply. We suggest that the definition in the Tasman Resource Management Plan may be appropriate: <i>"Indigenous vegetation – means any area of naturally occurring vegetation where the cover of indigenous plants is the same as or greater than exotic plants but excludes any indigenous vegetation which grows beneath plantation forestry."</i>
Cape Foulwind Staple 1 Ltd (S557)	Interpretation	Interpretation	S557.006	Support	Allow	We agree that the TTPP should be consistent in its application of words and terminology and note that there is no definition of "site coverage" in the TTPP. We agree that this term, if used in the TTPP, should have an accompanying definition. We submit that the definition of "building coverage" as set out in the National Planning Standards should be adopted throughout the TTPP as a measure of site coverage.
Suzanne Hills (S443)	Interpretation	Definitions	S443.003	Support in part	Amend	We agree that the TTPP should be consistent in its application of words and phrases. In respect of omitted definitions, we believe that a definition of "indigenous vegetation" should be included in the TTPP to ensure clarity when determining when the rules relating to indigenous vegetation should apply. We suggest that the definition in the Tasman Resource Management Plan may be appropriate: <i>"Indigenous vegetation – means any area of naturally occurring vegetation where the cover of indigenous plants is the same as or greater than exotic plants but excludes any indigenous vegetation which grows beneath plantation forestry."</i>
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makoahio (S620)	Interpretation	Definitions	S620.006	Support	Allow	We agree that the definition of "building coverage" as set out in the National Planning Standards should be adopted throughout the TTPP as a measure of site coverage.
Chris J Coll Surveying Limited (S566)	Interpretation	Boundary Adjustment	S566.263	Support	Allow	We agree that for the purposes of subdivision, "boundary adjustment" should include subdivisions where the number of allotments or titles is reduced. However, we acknowledge that the definition has been taken from the National Planning Standards, in which case the appropriate amendment may be to the Subdivision Rule SUB – R1 rather than the definition. Refer further submission on S566.199.
Birchfield Coal Mines Ltd (S601)	Interpretation	Earthworks	S601.005	Oppose	Disallow	We consider that earthworks associated with mineral prospecting, exploration or extraction should not be excluded from the definition of Earthworks. It is appropriate that the extent and effects of earthworks associated with mining be considered as part of any suite of consents required. The exclusion as requested could potentially create a circular reference between this definition and that of "Mineral Extraction," which includes ancillary earthworks.
David Ellerm (S581)	Infrastructure	Infrastructure	S581.065	Oppose	Disallow	There is no provision under the National Planning Standards for a new "Groundwater Source Protection Zone" to be included in this Plan as requested by the submitter. No scientific evidence has been provided that ground water flows towards this privately-owned bore, and water supply sources are already adequately protected by Regional Council requirements (e.g., Rule 79, Regional Land and Water Plan) and the National Environmental Standard for Sources of Drinking Water. This submission point is therefore considered to be out of scope of what can be included/regulated by the TTPP under the Resource Management Act 1991 and is also outside the regulatory function prescribed to a territorial authority under s31 Resource Management Act 1991.
David Ellerm – S581	Sites and Areas of Significance to	Sites and Areas of Significance to Māori	S581.022	Oppose	Disallow	We support Council's power to allow future expansion of the reticulated wastewater treatment system at Te Kinga as and when the settlement grows, subject to appropriate engineering design. Retaining the ability for Council to expand their infrastructure to cater for growth in the Te Kinga Settlement Zone is in

	Māori	Rules						
Grey District Council (S608)	Sites & Areas of Significance to Maori	SASM	S608.011 S608.012 S608.485 S608.486	Support	Allow	accordance with the purpose of the Resource Management Act 1991; that is, enabling communities to provide for their social and economic wellbeing, and to meet the needs of future generations.	We agree that the SASM overlay, and all associated rules, need further assessment to ensure that the overlay only affects land that is truly a site or area of significance to Maori and that the rules for SASMs can be implemented fairly. We agree that the overlay and all associated rules should be removed from the TTPP pending further detailed assessment and consultation with landowners and mana whenua.	
Chris J Coll Surveying Limited (S566)	Ecosystems and Indigenous Biodiversity	ECO - P1	S566.086	Support	Allow	We consider that the inclusion of a deadline is unnecessary. We consider that Clause (iii) could be deleted in its entirety without lessening the effect of the policy.		
Rebecca Inwood (S422)	Ecosystems and Indigenous Biodiversity	Permitted Activities	S422.001	Support	Allow	We agree that Rule ECO – R1 should be reviewed to include provision for clearance once SNAs have been identified and scheduled in Buller (and Westland) District. Rule ECO – R1 is complex and unclear as drafted.		
Buller District Council (S538)	Ecosystems and Indigenous Biodiversity	ECO - R1	S538.207	Support in part	Allow	We agree that a small amount of clearance should be provided for in this rule to allow for small-scale small scale building platforms within SNAs.		
Grey District Council (S608)	Ecosystems and Indigenous Biodiversity	ECO - R1	S608.056	Support	Allow	We agree that this rule requires amendment as proposed to clarify that clearance is a permitted activity if Clauses 1 and 2 are met, subject to Clause 4 or 5. We believe the wording of Clause 3 is unclear and needs to be amended to clarify that these provisions relate to clearance within an SNA or within riparian margins (assuming that is the intent). Clause 5 also requires clarification to describe the activity status of clearance once the SNA identification process has been completed in the Westland and Buller Districts. Overall, this rule is unclear as to when each provision applies.		
Tony Schroder (S343)	Ecosystems and Indigenous Biodiversity	ECO - R2	S343.005	Support	Allow	We agree that the rule as written requires amendment to allow for existing residential activities. As written, any landowner in the Coastal Environment (rural or urban) would require consent to clear and/or maintain indigenous vegetation within their existing residential curtilage. Clause 1 should be amended to include maintenance of vegetation within existing residential properties.		
Stewart & Catherine Nimmo (S559)	Ecosystems and Indigenous Biodiversity	ECO - R2	S559.004	Support	Allow	We agree that the clearance limit for a new building platform is inadequate and should be increased. We consider that the permitted clearance area should exclude access and allow area for an onsite wastewater system to be installed, if necessary, e.g., 1000m <sup>2</sup> excluding access.		
Denis and Wendy Cadigan (S532)	Ecosystems and Indigenous Biodiversity	ECO - R2	S532.002	Support	Allow	We agree that the clearance limit for a new building platform is inadequate and should be increased. We consider that the permitted clearance area should exclude access and allow area for an onsite wastewater system to be installed, if necessary, e.g., 1000m <sup>2</sup> excluding access.		
Buller District Council (S538)	Ecosystems and Indigenous Biodiversity	ECO - R4/SUB - R7	S538.211	Support	Allow	We agree that alternative legal mechanisms to protect indigenous biodiversity should be allowed. We further submit that there should be no requirement for the protected area to be contained within a single allotment. For example, two adjoining allotments may be increased in value and amenity by both containing areas of protected vegetation.		
Buller District Council (S538)	Ecosystems and Indigenous Biodiversity	ECO - R6/SUB - R9	S538.213	Support	Allow	We agree that alternative legal mechanisms to protect indigenous biodiversity should be allowed. We further submit that there should be no requirement for the protected area to be contained within a single allotment. For example, two adjoining allotments may be increased in value and amenity by both containing areas of protected vegetation.		
Chris J Coll Surveying Limited (S566)	Subdivision	SUB - P2	S566.185	Support	Allow	We agree that the phrase "deemed reasonable by Council" is subjective and unnecessary in relation to determining whether off-grid supply is appropriate.		
David Ellerm (S581)	Subdivision	SUB - P2	S581.046	Oppose	Disallow	The amended policy proposed suggests a specific minimum area for "land-based treatment," which is significantly larger than the proposed TTPP anticipates. Furthermore, the policy amendment requested by the submitter is more in the nature of a rule or standard than a policy. We consider that Policy SUB – P2(i) as notified is worded appropriately and should be retained, subject to the amendment suggested under S566.185.		

Department of Conservation (S602)	Subdivision	SUB - P4	S602.122	Support	Amend	<p>We agree that subdivision that creates new natural hazards or exacerbates existing hazards that cannot be adequately mitigated should be avoided. In a hazard definition criteria sense, we consider that Policy SUB – P4.a should be further amended. Geonet has a generalised Intensity term applied to the Simplified New Zealand MMI Scale, we therefore suggest that "severe ground shaking" be amended to "extreme ground shaking."</p>
Toka Tū Ake EQC (S612)	Subdivision	SUB - P4	S612.090	Support	Allow	<p>We agree that subdivision that creates new natural hazards or exacerbates existing hazards that cannot be adequately mitigated should be avoided. In a hazard definition criteria sense, we consider that Policy SUB – P4.a should be further amended. Geonet has a generalised Intensity term applied to the Simplified New Zealand MMI Scale, we therefore suggest that "severe ground shaking" be amended to "extreme ground shaking."</p>
Frank O'Toole (S595)	Subdivision	SUB - P6	S595.017	Support	Amend	<p>We agree that Policy SUB – P6.f should allow subdivision in areas where there are significant natural hazards, on the condition that risk from those hazards can be appropriately mitigated. We suggest that SUB – P6.f should be amended further, from "that does not manage significant risk..." to "Where significant risk of natural hazards cannot be adequately mitigated..." This enables suitably experienced and qualified engineers to assess risk and facilitates development if design measures can protect people and communities.</p>
Chris J Coll Surveying Limited (S566)	Subdivision	SUB - R1	S566.199	Support	Allow	<p>Noting that the definition of "boundary adjustment" in the TPPP is taken from National Planning Standards and therefore may not be suitable for amendment, we agree that Subdivision Rule SUB – R1 should be amended (or another rule created) to include permitted activity subdivision where the number of titles or allotments is reduced. The effects of such subdivisions are the same or less than a true boundary adjustment where the number of allotments or titles does not change.</p>
Department of Conservation (S602)	Subdivision	SUB - R11	S602.126	Oppose	Disallow	<p>We consider that the Restricted Discretionary status of Rule SUB – R11 provides adequate protection for Outstanding Natural Landscapes or Outstanding Natural Features, noting that criterion (a) ensures that the land landscape or natural feature values are maintained.</p>
Te Tai o Poutini Plan Committee (S171)	Subdivision	SUB - R17	S171.018	Support	Allow	<p>We agree that Rule SUB - R17 should be amended to ensure that the hierarchy of Controlled Activity Rule SUB – R5 is maintained in respect of Sites and Areas of Significance to Maori within the Coastal Environment.</p>
Chris J Coll Surveying Limited (S566)	Subdivision	SUB - R24	S566.255	Oppose	Disallow	<p>We consider that the non-complying status for subdivision within this overlay is appropriate. The "gateway" test within s104D will apply, i.e., if effects are not more than minor or the proposal is not contrary to relevant objectives and policies, consent can be granted.</p>
Chris J Coll Surveying Limited (S566)	Subdivision	SUB - R26	S566.257	Oppose	Disallow	<p>We consider that the non-complying status for subdivision within this overlay is appropriate. The "gateway" test within s104D will apply, i.e., if effects are not more than minor or the proposal is not contrary to relevant objectives and policies, consent can be granted.</p>
Chris J Coll Surveying Limited (S566)	Subdivision	SUB - R28	S566.259	Support in part	Amend	<p>We agree that Prohibited status is not appropriate. Where only part of a parcel is located within the Earthquake Hazard Overlay, 20m Buffer or where the proposed land use is not a sensitive activity, subdivision should be considered. We consider that non-complying status would be more appropriate, allowing the "gateway" test in s104D to be applied to any application.</p>
David Ellerm (S581)	Subdivision	Subdivision Standards	S581.052	Oppose	Disallow	<p>We do not support the creation of a special "Character Area" at Te Kinga, and submit that the objectives, policies, and rules for the proposed Settlement Zone are generally fit for purpose. We consider that the area does not have such a significantly unique character to justify the creation of a special set of rules. The submitter also has not provided any evidence supporting his request that the area should be included within a new "Character Area." It would therefore be highly inappropriate to classify the area as one which requires additional protection and/or development constraints.</p> <p>The standard SUB – S12 proposed appears to impose broad policy-style standards, including requiring the approval of a third-party, undefined "Character Committee". The list of assessment criteria does not include any measurable standards against which a subdivision consent application could be assessed.</p>
Department of Conservation (S602)	Subdivision	SUB - S2	S602.127	Support in part	Amend	<p>We agree that building platform locations should comply with all relevant rules for overlays applicable to the site, but do not agree that the Standard needs to include reference to areas identified in the resource</p>

Buller District Council (S538)	Subdivision	SUB - S5	S538.276	Oppose	Disallow	consent application. Any such areas would be subject to recommendations from the expert who identified the area.
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	Subdivision	SUB - S6	S190.449	Oppose	Disallow	We consider that requiring a specific wastewater feasibility report for every subdivision will result in unnecessary cost to applicants. To achieve compliance with the Standard, applicants must either provide a connection under SUB – S5.2, or provide evidence (e.g., approval in principle from the Regional Council) that onsite disposal can be achieved under SUB – S5.3. The scale of the development will determine the level of information required by Council. The standard does not require provision of onsite systems at the time of subdivision, merely evidence that wastewater can be disposed of in a sanitary manner.
Buller District Council (S538)	Subdivision	SUB - S9	S538.279	Support	Allow	Although we support standard SUB – S6, we do not support the amendment proposed by the submitter. Appropriate pedestrian and cycle access is provided for within engineering standards (currently NZS4404:2010) adhered to by all three District Councils. Limited public transport is available on the Coast, and this should be addressed at Local Government and/or strategic level rather than at subdivision.
Grey District Council (S608)	Coastal Environment	Coastal Environment	S608.079	Support	Allow	We agree that the definition of the bed of a river in this standard should be clarified as per the Act.
Department of Conservation (S602)	Coastal Environment	Coastal Environment	S602.138	Support	Allow	We agree that the extent of the Coastal Environment overlay should not include major urban areas.
Misato Nomura (S151)	Coastal Environment	Coastal Environment	S151.011	Support	Allow in part	We agree that the extent of the Coastal Environment overlay needs to be reviewed and adjusted in accordance with the NZ Coastal Policy Statement and the description in Policy CE – P1.
Buller District Council (S538)	Coastal Environment	Permitted Activities within the High Coastal Natural Character Overlay	S538.310	Support	Allow	We agree that the extent of the Coastal Environment needs review. We agree that in major urban areas, a 150m setback from Mean High Water Springs would be an appropriate boundary for the Coastal Environment overlay, but acknowledge that in other rural or coastal settlement areas the overlay should include areas directly affected by coastal process as described in the introduction to this chapter of the TTPP, that is: "...where coastal natural character and coastal processes (including coastal erosion), influences or qualities are significant."
Grey District Council (S608)	Coastal Environment	CE - O3	S608.647	Support	Allow	We support Council's request for the extent of the Coastal Environment overlay to be reviewed and carefully considered.
Grey District Council (S608)	Coastal Environment	CE - P6	S608.650	Support	Allow	We support the proposed amendment from "minimise" to "mitigate" as a more appropriate terminology.
Grey District Council (S608)	Coastal Environment	CE - P7	S608.651	Support	Allow	We support the proposed amendment from "minimise" to "mitigate" as a more appropriate terminology.
Chris J Coll Surveying Limited (S566)	Coastal Environment	CE - R4	S566.290 S566.291	Support	Allow	We support the proposed amendment from "minimise" to "mitigate" as a more appropriate terminology.
Buller District Council (S538)	Coastal Environment	CE - R5	S538.292	Support	Allow	We agree that the rules for building heights and ground floor areas in the general Coastal Environment should be consistent with the underlying zoning.
Buller District Council (S538)	Coastal Environment	CE - R6	S538.293	Support	Allow	We agree that the 100m <sup>2</sup> ground floor area is too restrictive, and that the outcome sought by this rule can be achieved by applying floor area and height restrictions like the current rules in the operative Buller District Paparua Character Area.
Buller District Council (S538)	Coastal Environment	CE - R6	S538.293	Support	Allow	We agree that the requirement for maintenance, alteration, repair, and reconstruction works to be undertaken only by Statutory Agencies is too onerous, and that clause 6 should be deleted. Providing the other criteria in Rule CE – R6 are met, the activity should retain permitted activity status to ensure that

Buller District Council (S538)	Coastal Environment	CE - R9	S538.296	Support	Allow	privately-owned structures can be maintained appropriately.
Federated Farmers of New Zealand (S524)	Rural Zones	RURZ - P1	S524.109	Support	Allow	We agree that the requirement for maintenance, alteration, repair, and reconstruction works to be undertaken only by Statutory Agencies is too onerous, and that clause 6 should be deleted. Providing the other criteria in Rule CE – R6 are met, the activity should retain permitted activity status to ensure that privately-owned structures can be maintained appropriately.
Horticulture New Zealand (S486)	Rural Zones	RURZ - P5	S486.068	Support	Allow	We agree with the proposed wording/structure change to this Policy, and the reasoning behind it. The criteria remain the same, but the wording is clearer as to the amenity and character of the "variety of activities" for which consent may be sought.
David Ellerm (S581)	Rural Zones	RURZ - P11	S581.054	Oppose	Disallow	We agree that the Rural policies should give effect to the NPS for Highly Productive Land and support the proposed amendment. However, we also consider that the extent of the Highly Productive Land Precinct should be reviewed to ensure that the overlay aligns with the National Policy Statement for Highly Productive Land. If the two are not consistent, this will lead to confusion for landowners in the future.
Federated Farmers of New Zealand (S524)	Rural Zones	RURZ - P15	S524.115	Support	Allow	The suggested urban-style development standard amendment to RURZ – P11 is incompatible with the desired character for Rural zones. The creation of subdivisions with sealed roads, pedestrian/cycle ways, fire hydrants and street lighting are directly contrary to the low-density rural character and amenity that is anticipated within the Rural zones and will therefore not achieve the purpose of the Resource Management Act 1991.
Federated Farmers of New Zealand (S524)	Rural Zones	GRUZ - PREC 5	S524.027	Support	Allow	We agree that the use of a defined term is an improvement to the wording of this Policy, which is more concise and less open to interpretation.
Buller District Council (S538)	General Rural Zone	GRUZ - R9	S538.504	Support	Allow	We agree that the TPPP should include a new definition for highly productive land that is consistent with the NPS for Highly Productive Land. We also consider that the extent of the Highly Productive Land Precinct should be reviewed to ensure that the overlay aligns with the NPS for Highly Productive Land. If the two are not consistent, this will lead to confusion for landowners in the future.
Buller District Council (S538)	Rural Lifestyle Zone	RLZ - R8	S538.535	Support	Allow	We agree that restricting the number of "off-site" FTE employees will help to ensure that rural amenity and character is maintained, by creating a defined scale that is appropriate for home-based businesses. In the General Rural zone, the large site size could potentially result in a larger-scale business without a limitation of this nature. The term "ancillary to a residential activity" could potentially be interpreted subjectively, whereas limiting employees and traffic volumes are measurable limits.
David Ellerm (S581)	Settlement Zone	SETZ - R1	S581.056	Oppose	Disallow	We agree that restricting the number of "off-site" FTE employees will help to ensure that rural amenity and character in the Rural Lifestyle Zone is maintained, by creating a defined scale that is appropriate for home-based businesses in this area. We agree that the rule should be consistent with the similar rule for the General Rural zone, including the requirement for the business to be ancillary to residential activity.
Buller Conservation Group (S552)	Settlement Zone	SETZ - R2	S552.187	Oppose	Disallow	The rule sought is superfluous because onsite wastewater discharges are already adequately controlled by other regulatory bodies including but not limited to Regional Council discharge rules (Rule 79, Regional Land and Water Plan), and engineering standards such as NZS4404:2010). Discharge of contaminants into the environment is primarily a Regional Council function under s30 Resource Management Act 1991 and are not to be governed under a District Plan. Furthermore, the submitter is proposing that the rule requires information to be provided under the Building Act 2004 ("...a building permit application must be accompanied by..."). This is outside the scope of a District Plan prepared under the Resource Management Act 1991.
						The rule SETZ – R2.5 is a site-specific rule relating only to the Kumara Junction Development Area, which is a defined development that is also subject to site-specific rules requiring the retention of bush buffer zones on all boundaries. These buffer strips must be a minimum of 5m each side of boundaries to comply with the permitted activity standard, resulting in 10 metres of bush separating each residential section within the Development Area.
						The 2000m <sup>2</sup> per site clearance permitted by proposed Rule SETZ – R2.5.b is significantly more restrictive than the general rule controlling vegetation clearance in the Westland District. Rule ECO –

									<p>R1.5. it allows up to 5000m<sup>2</sup> clearance per site over any three-year period for land outside any scheduled Significant Natural Area.</p> <p>Davis Ogilvie have been involved in this development since its inception, including re-zoning the site and developing this rule. The 2000m<sup>2</sup> clearance and bush buffer zone rules under SETZ – R2 were originally set in the operative District Plan in 2012 by the re-zoning Plan Change 8 that created Kumara Junction Developments. The effects of the vegetation clearance were considered at the time of the Plan Change, including an ecological assessment of the site.</p> <p>The protection of the natural bush environment is a key component of the Kumara Junction Development Area, with specific controls in place to ensure those amenity values are maintained. It is appropriate that those controls are carried through from the current District Plan to the Te Tai o Poutini Plan.</p> <p>Rule SETZ – R2.5 should be retained as proposed; that is, permitting up to 2000m<sup>2</sup> of indigenous vegetation clearance per site.</p> <p>The maximum building height as notified is consistent with the previous District Plans and is therefore consistent with the scale of development already present and/or anticipated within the Settlement Zone. Buildings in the Settlement zone must also comply with recession plane requirements under Rule SETZ – R2.6, which will avoid shading effects on neighbours. We do not consider that the height should be amended.</p> <p>We do not consider that the site coverage rules as proposed for the Settlement zone should be reduced, 40% site coverage, as notified, still retains a dominance of open space over the built environment but allows owners to utilise their land as they see fit.</p> <p>Rule SETZ – R2.5 is a site-specific rule relating only to the Kumara Junction Development Area, which is a defined development that is also subject to site-specific rules requiring the retention of bush buffer zones on all boundaries. These buffer strips must be a minimum of 5m each side of boundaries to comply with the permitted activity standard, resulting in 10 metres of bush separating each residential section within the Development Area.</p> <p>The 2000m<sup>2</sup> per site clearance permitted by proposed Rule SETZ – R2.5.b is significantly more restrictive than the general rule controlling vegetation clearance in the Westland District. Rule ECO – R1.5. it allows up to 5000m<sup>2</sup> clearance per site over any three-year period for land outside any scheduled Significant Natural Area.</p> <p>Davis Ogilvie have been involved in this development since its inception, including re-zoning the site under Plan Change 8 and developing this rule. The effects of the vegetation clearance were considered at the time of the Plan Change, including an ecological assessment of the site.</p> <p>The protection of the natural bush environment is a key component of the Kumara Junction Development Area, with specific controls in place to ensure those amenity values are maintained. It is appropriate that those controls are carried through from the current District Plan to the Te Tai o Poutini Plan. Rule SETZ – R2.5 should be retained as proposed; that is, permitting up to 2000m<sup>2</sup> of indigenous vegetation clearance per site.</p> <p>We support the proposed amendment to this rule, which is consistent with the Council's submission for other Rural zone home-based businesses. We also suggest that this rule should include a proviso that the business is ancillary to residential activity.</p> <p>We support the policy direction encouraging energy efficiency and minimal impact stormwater management but note that this does not appear to flow through to any requirement to implement this in the relevant Residential zone rules. Refer further submissions on S538.475 and S608.720.</p> <p>A further amendment to Clause 8 is suggested, to ensure that low-impact stormwater management methods are considered and implemented where possible, in accordance with Policy RESZ – P3.</p> <p><i>"8. All residential units and buildings used for a residential activity must be connected to the community water supply and wastewater networks where available, and stormwater from the site used for the activity must not drain to any public road except for secondary flow purposes. Where practicable, the use of garden rainwater tanks and minimal impact stormwater management principles shall be implemented."</i></p>
David Ellerm (S581)	Settlement Zone	SETZ - R2	S581.057	Oppose	Disallow				
David Ellerm (S581)	Settlement Zone	SETZ - R2	S581.058	Oppose	Disallow				
Frída Inta (S553)	Settlement Zone	SETZ - R2	S553.187	Oppose	Disallow				
Buller District Council (S538)	Settlement Zone	SETZ - R9	S538.559	Support	Amend				
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whaitu Ora (S190)	Residential Zones	RESZ - P3	S190.838	Support	Allow				
Buller District Council (S538)	General Residential Zone	GRZ - R1	S538.475	Support	Amend				

Grey District Council (S608)	General Residential Zone	GRZ - R1	S608.720	Support	Amend	<p>A further amendment to Clause 8 is suggested, to ensure that low-impact stormwater management methods are considered and implemented where possible, in accordance with Policy RESZ – P3.</p> <p><i>"8. All residential units and buildings used for a residential activity must be connected to the community water supply and wastewater networks, and stormwater from the site used for the activity must not drain to any public road except for secondary flow purposes. Where practicable, the use of garden rainwater tanks and minimal impact stormwater management principles shall be implemented."</i></p>
Buller District Council (S538)	General Residential Zone	GRZ - R13	S538.485	Support	Allow	<p>We agree that the matters of discretion for this rule should be clarified as submitted.</p>
Grey District Council (S608)	General Residential Zone	GRZ - R1	S608.720	Support	Amend	<p>A further amendment to Clause 8 is suggested, to ensure that low-impact stormwater management methods are considered and implemented where possible, in accordance with Policy RESZ – P3.</p> <p><i>8. All residential units and buildings used for a residential activity must be connected to the community water supply and wastewater networks and stormwater from the site used for the activity must not drain to any public road except for secondary flow purposes. Where practicable, the use of garden rainwater tanks and minimal impact stormwater management principles shall be implemented."</i></p>
Grey District Council (S608)	Large Lot Residential Zone	LLRZ - R1	S608.728	Support	Amend	<p>A further amendment to Clause 6 is suggested, to ensure that low-impact stormwater management methods are considered and implemented where possible, in accordance with Policy RESZ – P3.</p> <p><i>"6. Stormwater is managed on site with any off-site discharge is managed in accordance with NZS4404:2010 Land Development and Subdivision Infrastructure and must not drain to any public road except for secondary flow purposes. Where practicable, the use of garden rainwater tanks and minimal impact stormwater management principles shall be implemented."</i></p>
Grey District Council (S608)	Medium Density Residential Zone	MRZ - R1	S608.733	Support	Amend	<p>A further amendment to Clause 7 is suggested, to ensure that low-impact stormwater management methods are considered and implemented where possible, in accordance with Policy RESZ – P3.</p> <p><i>7. All residential units and buildings used for a residential activity must be connected to the community water supply and wastewater networks and stormwater from the site used for the activity must not drain to any public road except for secondary flow purposes. Where practicable, the use of garden rainwater tanks and minimal impact stormwater management principles shall be implemented."</i></p>
Heritage New Zealand Pouhere Taonga (S140)	Schedule Of Historic Heritage Items and Areas	SCHED1	S140.062	Support	Amend	<p>HH103 – Hokitika Totalisator Building – is listed as a Category 2 Historic Place in Schedule 1 of the TTPP. However, on the Heritage List it is noted as being a Category 1 site. Davis Oqilwie is preparing an application for consent to demolish this building, subject to recovery and protection of specified heritage items. The Schedule should be consistent with the Heritage List.</p>
Buller District Council (S538)	Appendix Nine: Airport Approach Path Overlay	Appendix Nine: Airport Approach Path Overlay	S538.581	Support	Allow	<p>The Operative District Plan imposes a 1.2m height restriction over the Rural Airport Zone at Westport (Table 5.8 Rural Airport Zone Standards). This rule has been pulled through to the TTPP as covering a much larger area including all the approach paths for the Westport airport. The approach path overlay for the Westport airport covers the built-up area of Carters Beach. The extent of the height restriction needs to be re-addressed. We also note that the terminology in the Appendix and the Planning Maps do not align; these should both refer to the "Airport Approach Paths" if this is the intent. The rule in Appendix 9 currently refers to "Flight Paths".</p>
David Eilerm (S581)	Planning Maps and Overlays	Planning Maps and Overlays	S581.064	Oppose	Disallow	<p>As discussed under S581.052, we oppose the creation of a "Character Area" at Te Kinga, and accordingly the proposed spatial layer and development rules requested by the submitter should not be included in the TTPP.</p>
Gina Hogarth (S304)	Planning Maps and Overlays	Natural Hazards	S304.004	Support	Allow	<p>We agree that natural hazard overlays should not be used without expert evidence to support them. We consider that the Flood Plain overlay should be removed from the TTPP.</p>
Shaun and Carissa du Plessis (S402)	Planning Maps and Overlays	Natural Hazards	S402.003	Support	Allow	<p>We agree that natural hazard overlays should not be used without expert evidence to support them. We consider that the Flood Plain overlay should be removed from the TTPP.</p>
Griffen & Smith Ltd (S253)	Planning Maps and Overlays	Natural Hazards	S253.007	Support	Allow	<p>We support the removal of the Coastal Hazard Alert overlay from the Mitre 10 Greymouth site, for the reasons outlined in their original submission.</p>



West Coast Regional Council (S488)	Planning Maps and Overlays	Sites and Areas of Significance to Māori	S488.013	Support	Allow	We agree that SASM's should be re-visited and confirmed using a process of consultation with landowners and mana whenua.
Grey District Council (S608)	Planning Maps and Overlays	Sites and Areas of Significance to Māori	S608.003	Support	Allow	We agree that the SASM overlay, and all associated rules should be removed from the TPPP pending further detailed assessment and consultation with landowners and mana whenua.
Grey District Council (S608)	Planning Maps and Overlays	Coastal Environment	S608.487	Support	Allow	We agree that the Coastal Environment overlay should be reviewed and amended so that the area covered fits with the description: "...Coastal Environment overlay that recognises the extent and characteristics of the coastal environment where coastal natural character and coastal processes (including coastal erosion), influences or qualities are significant."
Te Kinga Investments Ltd (S598)	Planning Maps and Overlays	Rezoning Requests	S598.001	Support	Allow	We support Te Kinga Investments' proposal to re-zone their land at Iveagh Bay and agree that the effects of the re-zoning will result in less overall density over the site.
Griffen & Smith Ltd (S253)	Planning Maps and Overlays	Rezoning Requests	S253.003 S253.004	Support	Allow	We support the minor re-zoning sought by this submitter, which will tidy up the zoning in this area consistent with future land use.
Ball Developments Ltd (S453)	Planning Maps and Overlays	Rezoning Requests	S453.001 S453.002 S453.003 S453.004 S453.006	Support	Allow	We support the minor rezoning within Kaiata Park sought by this submitter, which will tidy up the zoning in this area consistent with existing subdivision development and future land use.
Riarnne Klempel (S67)	Planning Maps and Overlays	Rezoning Requests	S67.009	Oppose	Disallow	The submitter has requested re-zoning of privately owned land over which they have no authority. Lot 8 DP 361177 is owned by Barrytown Developments Ltd and is the balance title from the first stage of a subdivision completed in 2007. Davis Oglivie is presently collaborating with the owner to develop an appropriate overall development plan for the site. The site will be developed in a manner that will enhance and protect the natural values of the site including the 'lakes' (historic dredge ponds) and its coastal location.  Once the overall concept plan for the site has been finalised, it is anticipated that resource consents will be sought for a staged development. Rural Lifestyle zoning as proposed in the notified TPPP is the most suitable zoning for this property by the owner and developer and should be retained as notified.
West Coast Regional Council (S488)	Planning Maps and Overlays	Rezoning Requests	S488.011 S488.034	Support	Allow	We agree that the extent of the Highly Productive Land Precinct should be reviewed to ensure that the overlay aligns with the National Policy Statement for Highly Productive Land. If the two are not consistent, this will lead to confusion for landowners in the future.