



Plan Sections: Energy, Infrastructure & Transport; Energy, Infrastructure, Transport

This is a summary of decisions requested in submissions made on the Proposed Te Tai o Poutini Plan. Note that this document may only contain a subset of decisions requested. Summaries of all decisions requested and details on how to make a further submission are available at www.ttpn.nz

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Buller Conservation Group (S552)	S552.043	Infrastructure	Energy Infrastructure and Transport	Oppose	Concerned that the plan is making it too permissive for such telecom infrastructure	Change to discretionary activity
Buller Conservation Group (S552)	S552.044	Energy Infrastructure and Transport	Energy Infrastructure and Transport	Amend	Above the treeline scarring is very obvious and the treeline is not necessarily at 1000m.	R10; a Visual impacts on landscapes above the treeline over 1000m above sea level;
Frida Inta (S553)	S553.044	Energy Infrastructure and Transport	Energy Infrastructure and Transport	Amend	Above the treeline scarring is very obvious.	R10; a Visual impacts on landscapes above the treeline over 1000m above sea level;
David Ellerm (S581)	S581.012	Energy Infrastructure and Transport	Energy Infrastructure and Transport	Support	Support the following Objectives and Policies Energy Infrastructure Transport	Retain
Department of Conservation (S602)	S602.036	Energy Infrastructure and Transport	Energy Infrastructure and Transport	Neutral	DOC is neutral as these do not affect priority conservation values, biodiversity values, or DOC's interests.	NA
The Proprietors of Mawhera Tiamana Mawhera Incorporation (S621)	S621.006	Energy Infrastructure and Transport	Energy Infrastructure and Transport	Not Stated	Not stated	Not stated
Westland District Council (S181)	S181.001	Energy	Energy	Support	Westland District Council supports these Objectives, Policies and Rules	Retain the objectives, policies and rules
Te Mana Ora (Community and	S190.037	Energy	Energy	Support	Te Mana Ora supports the objectives and policies in this section, particularly	retain objectives and policies that support development of renewable energy

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Public Health) of the NPHS/ Te Whatu Ora (S190)					those regarding the development of renewable energy generation activities. This should assist in moving the West Coast away from its reliance on burning coal for heating homes which has a negative impact on air quality and health.	generation
Transpower New Zealand Limited (S299)	S299.027	Energy	Energy	Amend	Transpower's preference is for the Energy chapter to be entirely self-contained, so that other chapters in the plan do not apply to the National Grid. However, should this approach not be adopted, Transpower has made submissions on other chapters in the Proposed Plan to indicate what changes would be required, whether they are incorporated into the Energy Chapter or remain in their current location.	Amend the Energy Chapter so that it is self-contained, and reference to other chapters is not required
Manawa Energy Limited (Manawa Energy) (S438)	S438.035	Energy	Energy	Support in part	The Overview section of the Plan incorrectly refers to the title of the NPS on Renewable Energy Generation. This National Policy Statement applies to Renewable Electricity Generation.	Replace the word 'Energy' in the reference to the NPS with the word 'Electricity' in the second paragraph of the Overview section to read as follows: ... with renewable electricity recognised in the National Policy Statement on Renewable-Electricity Generation.
Manawa Energy Limited (Manawa Energy) (S438)	S438.047	Energy	Energy	Support	Manawa supports the inclusion of note 1 which reiterates where these rules apply to energy and renewable electricity generation activities, the rules in the INF chapter do not apply.	Retain Note 1 as notified.
Inger Perkins (S462)	S462.031	Energy	Energy	Amend	Councils can also take a lead by installing clean energy, such as solar, on council property. In addition, they could even secure lower prices with vendors of renewable energy systems through bulk purchasing and passing the savings on to individuals. There is a great deal of scope for councils and TTPP to support clean energy at micro scale.	Include Methods in the TTPP (other than rules) that support installation of clean energy at a micro scale

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
New Zealand Energy Limited (S463)	S463.001	Energy	Energy	Support	While we support the provisions outlined in the Energy section of the plan, we consider that existing Hydroelectric Infrastructure should be included as a Special Purpose Zone similar to that provided for Mineral Extraction.	Provide for existing Hydroelectric Infrastructure in a specific special zone
New Zealand Energy Limited (S463)	S463.003	Energy	Energy	Amend	This would be consistent with the WCRPS and NPS Renewable Electricity Generation. There are a number of examples of hydroelectric assets being included in Special Zones in other District Plans in New Zealand. We have provided two examples including the current Queenstown Lakes District Plan and The Central Otago District Plan. Extracts of these Plans are included in the detailed submission,	Provide rules for existing hydroelectric infrastructure within a special purpose zone similar to those in the Queenstown Lakes or Central Otago District Plan
Lynley Hargreaves (S481)	S481.025	Energy	Energy	Support	I support the provisions that have been included in the draft plan with regard to climate change, such as to allow for the provision electric car and bike charging stations.	Retain the provisions in the chapter that support a transition to low carbon lifestyles.
Inchbonnie Hydro Limited (S540)	S540.001	Energy	Energy	Support	While we support the provisions outlined in the Energy section of the plan, we consider that existing Hydroelectric Infrastructure should be included as a Special Purpose Zone similar to that provided for Mineral Extraction.	Provide for existing Hydroelectric Infrastructure in a specific special zone
Inchbonnie Hydro Limited (S540)	S540.003	Energy	Energy	Amend	This would be consistent with the WCRPS and NPS Renewable Electricity Generation. There are a number of examples of hydroelectric assets being included in Special Zones in other District Plans in New Zealand. We have provided two examples including the current Queenstown Lakes District Plan and The Central Otago District Plan. Extracts of these Plans are included in the detailed submission,	Provide rules for existing hydroelectric infrastructure within a special purpose zone similar to those in the Queenstown Lakes or Central Otago District Plan

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.107	Energy	Energy	Amend	As proposed it could extend beyond electricity and renewable energy. Given the regionally significant nature of the energy activities intended to be addressed in this chapter, either the definition needs amending or the provisions in this chapter need to be specific to National Grid, electricity transmission, distribution and renewable electricity generation activities.	Either the definition of "Energy Activity" as sought above or amend all provisions in this chapter to be specific to National Grid or electricity transmission, distribution and renewable electricity generation activities.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.108	Energy	Energy	Amend	See Key Issue above for submission points.	Amend where this chapters refers to biodiversity effects: rather than including a different standard of effects management (e.g., 'minimising'), a specific requirement should be included to give effect to the ECO chapter provisions.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.439	Energy	Energy	Amend		As sought elsewhere, amend the definition of overlay chapter to deal with the Key Issue as set out above, so that it is clear that not only the 'overlay provisions' apply.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.441	Energy	Energy	Support		Delete reference to Strategic Objectives, as submitted elsewhere.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.442	Energy	Energy	Amend		Make amendments to ensure that the natural open space zone provisions also apply to activities covered in this chapter.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.444	Energy	Energy	Amend	See Key Issue above for submission points.	a specific requirement should be included to give effect to the ECO chapter provisions.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Manawa Energy Limited (Manawa Energy) (S438)	S438.033	Energy	Overview	Support in part	<p>The energy chapter covers generation, transmission and distribution of electricity. It inherently covers both renewables and non-renewables, however there is no provision for non-renewable energy nor any deterrent to non-renewable energy activities being established. The development of and continue use of non-renewable energy is not supported by international commitments and national direction and this needs to be made clear in the chapter.</p> <p>It is considered inappropriate that non-renewable energy activities, by virtue of inclusion within the definition of 'energy activities', are considered in the same manner as renewable electricity generation activities given the NPS that applies solely to these activities (NPS - RG 2011). Manawa requests that the wording is amended throughout the Plan to refer to Renewable Electricity Generation (as opposed to energy activities) in all supporting policies. Further it requests that a policy be added to avoid the development of non-renewable energy generation activities on the West Coast, and facilitate the replacement of non-renewable energy sources, including the use of fossil fuels, in energy generation.</p>	<p>Amend all objectives and policies by removing the reference to 'energy activities' and replacing this with a reference to 'renewable electricity generation activities'.</p> <p>Add a new policy as follows:ENG - P10 Avoid the development of non-renewable electricity generation activities on the West Coast and facilitate the replacement of non-renewable energy sources, including the use of fossil fuels, in electricity generation.</p>
Buller Electricity Limited (S451)	S451.019	Energy	Overview	Support	<p>Buller Electricity supports the overview in the energy section of the Energy Infrastructure and Transport Chapter.</p>	<p>It is suggested that a comma between Energy and Infrastructure is appropriate - Energy, Infrastructure and Transport Chapter.</p>
Horticulture New Zealand (S486)	S486.013	Energy	Overview	Oppose in part	<p>The Overview states that regionally significant infrastructure requires</p>	<p>Amend ENG-Overview Para 1 and 2: Energy activities, including renewable</p>

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					<p>recognition and protection. HortNZ agrees it is important to the community and needs to be recognised and provided for. But applying a 'protection' elevates that infrastructure above other activities. HortNZ considers that an approach of recognise and provide for and not being compromised by incompatible activities ensures that other activities can occur alongside regionally significant infrastructure.</p> <p>The NPS-ET does not require 'protection' of the National Grid - it seeks that it is 'recognised and provided for'.</p>	<p>electricity generation, transmission, distribution and operation are recognised as regionally significant infrastructure in the West Coast Regional Policy Statement. As such they need to be recognised and provided for as they are critical to the social, cultural and economic wellbeing of people and communities.</p> <p>The National Policy Statement for Electricity Transmission requires that the National Grid is recognised and provided for, with renewable electricity recognised in the National Policy Statement on Renewable Energy Generation.</p>
Westpower Limited (S547)	S547.066	Energy	Overview	Amend	Makes no comment about the actual West Coast situation.	<p>Add new 2nd paragraph:It is also recognised that Energy Activities, including Critical Infrastructure, do already exist, and given the topography of the West Coast may in the future require location, within the full range of natural and built environments of the region. The establishment and provision of Energy Activities, including renewable generation, provides for the maintenance and enhancement of the communities cultural, economic and social wellbeing, including health and safety, and assists with developing resilient communities on the West Coast.</p>
Westpower Limited (S547)	S547.067	Energy	Overview	Amend	Does not state the importance of renewable electricity activities.	<p>Amend existing 2nd paragraph: The National Policy ... protection of the National Grid. The National Policy Statement for Renewable Energy Generation recognises the national</p>

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						significance of renewable electricity generation activities, including the need for, and benefits from, renewable electricity generation.
Westpower Limited (S547)	S547.068	Energy	Overview	Amend	<p>(1) The overview highlights various statutory requirements and recognition of the importance of such activities as regionally significant in the RPS, but makes no comment about the actual West Coast situation. Further comment is needed in that regard.</p> <p>(2) The existing 2nd paragraph advises that renewable electricity is recognised in the National Policy Statement for Renewable Electricity Generation (the NPSREG) but does not state the importance of such activities. The statement should be amended to reflect the national significance of the issue.</p> <p>(3) The last paragraph provides that the "Infrastructure Chapter" and "Area Specific Provisions (Zone Chapters)" do not apply to Energy Activities. That clarification/statement is supported as it provides for energy activities and associated infrastructure in an appropriate manner. Zone provisions do not appropriately recognise or provide for these activities. Given the intent the requirements should be included in the "Other Relevant Provisions" section of this Chapter for plan interpretation and implementation purposes.</p>	<p>(1) Add new 2nd paragraph: It is also recognised that Energy Activities, including Critical Infrastructure, do already exist, and given the topography of the West Coast may in the future require location, within the full range of natural and built environments of the region. The establishment and provision of Energy Activities, including renewable generation, provides for the maintenance and enhancement of the communities cultural, economic and social wellbeing, including health and safety, and assists with developing resilient communities on the West Coast.</p> <p>(2) Amend existing 2nd paragraph (proposed 3rd paragraph in this submission), "The National Policy ... protection of the National Grid. The National Policy Statement for Renewable Energy Generation recognises the national significance of renewable electricity generation activities, including the need for, and benefits from, renewable electricity generation.</p> <p>(3) Retain the provision "the Infrastructure Chapter and the Area Specific Provisions (Zone Chapters) do not apply to Energy Activities" but move under the heading "Other Relevant Te Tai o Poutini Provisions".</p>

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Transpower New Zealand Limited (S299)	S299.028	Energy	Other relevant Te Tai o Poutini Plan provisions	Amend	Transpower supports the provision of an energy chapter and in particular supports the recognition of the National Grid and NPSET. Transpower does not support the approach that other rules in the plan potentially apply. Such an approach does not achieve a stand-alone Energy chapter and provides an overly complicated and potentially contradictory rule framework for energy activities. Amendments are suggested to address this.	Amend parts of the overview as follows: ... The Energy Chapter contains the objectives, policies, rules for managing energy activities—Infrastructure Chapter rules and the Area Specific Provisions (Zone chapters) do not apply to energy activities., however the Overlay chapters and other District Wide also apply where relevant. Provisions in other chapters do not apply. ... Overlay Chapters—the Overlay Chapters have relevant provisions in relation to Sites and Areas of Significance to Māori; Ecosystems and Indigenous Biodiversity; Landscape and Natural Features; Natural Character and Margins of Waterbodies; Natural Hazards; and the Coastal Environment. Where an energy activity is located within an overlay area (as identified in the planning maps) then the relevant overlay provisions apply. Other relevant Te Tai o Poutini Plan provisions—It is important to note that in addition to the provisions in this chapter, a number of other Part 2: District wide Matters chapters also contain provisions that may be relevant for energy activities, including: Overlay Chapters—the Overlay Chapters have relevant provisions in relation to Sites and Areas of Significance to Māori; Ecosystems and Indigenous Biodiversity; Landscape and Natural Features; Natural Character and Margins of Waterbodies; Natural Hazards; and the Coastal Environment. Where an energy activity is located within an overlay area (as identified in the planning maps) then the relevant overlay provisions apply. Subdivision—The Subdivision chapter sets out the requirements for the development

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						of new electricity connections as part of subdivision activities. Financial Contributions – The Financial Contributions chapter sets out the requirements for contributions of costs for activities which impact on infrastructure. General District Wide Matters – provisions in relation to Activities on the Surface of Water, Noise and Earthworks in particular may be relevant to energy activities
Westpower Limited (S547)	S547.069	Energy	Other relevant Te Tai o Poutini Plan provisions	Amend	It is unclear at times whether provisions that do not refer to "Energy Activities" apply.	Provide an explanatory note to clarify applicability of provisions that do not specifically reference Energy Activities.
Westpower Limited (S547)	S547.070	Energy	Other relevant Te Tai o Poutini Plan provisions	Amend	There is reference to "Infrastructure", and this should be amended to "Energy Activities"	Amend Financial Contributions bullet point, ... activities which impact on Energy Activities.
Westpower Limited (S547)	S547.071	Energy	Other relevant Te Tai o Poutini Plan provisions	Amend	Activities on the Surface of Water was not meant to apply to Energy Activities.	Delete reference to Activities on the Surface of Water under the General District Wide Matters bullet point.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.437	Energy	Other relevant Te Tai o Poutini Plan provisions	Amend	The consideration of relevant provisions within overlay chapters is limited by those provisions only applying "within an overlay area identified in the Planning maps"	Under the "Other relevant Te Tai o Poutini Plan provisions" heading, amend in line with the Key Issue addressed above, making it clear that not only the provisions that apply specifically to identified overlays apply.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.438	Energy	Other relevant Te Tai o Poutini Plan provisions	Amend	The consideration of relevant provisions within overlay chapters is limited by those provisions only applying "within an overlay area identified in the Planning maps"	Ensure the Coastal Environment chapter is referenced in the other relevant provisions section.
Buller Electricity Limited (S451)	S451.023	Energy	Energy Objectives	Amend	This separates the requirement to give effect to the RPS from the second part of Objective 3	Add a new objective as follows: <i>Energy activities, including their operation, maintenance, upgrading or development, are protected from the adverse effects of</i>

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<i>incompatible subdivision and development.</i>
Frank and Jo Dooley (S478)	S478.080	Energy	Energy Objectives	Amend	This separates the requirement to give effect to the RPS from the second part of Objective 3	Add a new objective as follows: <i>Energy activities, including their operation, maintenance, upgrading or development, are protected from the adverse effects of incompatible subdivision and development.</i>
Buller District Council (S538)	S538.017	Energy	Energy Objectives	Support	Council supports the objectives and policies for Energy Activities.	Retain as notified.
Westpower Limited (S547)	S547.073	Energy	Energy Objectives	Amend	There is no objective for co-ordinating the provision and use of energy activities.	Add new objective: To ensure the efficient provision and use of Energy Activities, including Critical Infrastructure, for communities by co-ordinating the provision of Energy Activities with subdivision, use and development.
Westpower Limited (S547)	S547.075	Energy	Energy Objectives	Amend	(1) The current wording of the objectives does not reflect or give effect to the RPS. It is noted that wording in the Infrastructure Section is more closely aligned with the RPS and it is unclear why there is a difference between outcomes sought for "Energy Activities" as compared with "Infrastructure"? (2) There is no objective for co-ordinating the provision and use of energy activities at the time of subdivision and/or development as is proposed for Infrastructure. It is unclear why that would be and	(1) Add new Objective, "ENG-?? To enable the safe, efficient and integrated development, operation, maintenance and upgrading of Energy Activities, including related Infrastructure and Critical Infrastructure, to meet the needs of the West Coast/Te Tai o Poutini." (2) Add new objective, "ENG-?? To ensure the efficient provision and use of Energy Activities, including Critical Infrastructure, for communities by co-ordinating the provision of Energy Activities with subdivision, use and development."

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					does not assist with integrating development and provision of energy as sought through the RPS.	
Westpower Limited (S547)	S547.077	Energy	Energy Objectives	Amend	Separated ENG-02, with the new objective proposed.	New Objective: To manage adverse effects of Energy Activities on the environment while recognising and providing for the matters in Objectives ENG-01 and ENG-02."
Chris & Jan Coll (S558)	S558.428	Energy	Energy Objectives	Support		REtain
Chris J Coll Surveying Limited (S566)	S566.428	Energy	Energy Objectives	Support		REtain
William McLaughlin (S567)	S567.048	Energy	Energy Objectives	Support		REtain
Laura Coll McLaughlin (S574)	S574.428	Energy	Energy Objectives	Support		REtain
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.038	Energy	ENG - O1	Support	We support this objective.	Retain objective.
Transpower New Zealand Limited (S299)	S299.029	Energy	ENG - O1	Support	Transpower supports this objective, noting that ENG-04 is specific to the National Grid and gives effect to Policy 1 of the NPSET.	Retain the objective
Manawa Energy Limited (Manawa Energy) (S438)	S438.036	Energy	ENG - O1	Support in part	Manawa supports this provision, however requests that changes are made to terminology used in the objective to ensure that there is consistency between amendments sought to other parts of the Plan. Manawa considers it essential that Renewable Electricity Generation activities are provided for within the pTTPP to give effect to the provisions of the NPS - REG.	Amend ENG - O1 as follows: To recognise the local and regional benefits of electricity transmission, distribution and renewable electricity generation activities, by providing for their development, operation, maintenance and upgrading to meet the needs of Te Tai o Poutini/the West Coast.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Buller Electricity Limited (S451)	S451.020	Energy	ENG - O1	Amend	The proposed Objective ENG - 01 is supported in part however BEL seek a minor amendment to the objective, as set out below, to ensure it reads correctly.	<i>Amend to read: To recognise the local and regional benefits of electricity transmission, distribution and renewable electricity generation activities; and provide</i> for their development, operation, maintenance and upgrading to meet the needs of Te Tai o Poutini/the West Coast.
Frank and Jo Dooley (S478)	S478.077	Energy	ENG - O1	Amend	The proposed Objective ENG - 01 is supported in part however BEL seek a minor amendment to the objective, as set out below, to ensure it reads correctly.	<i>Amend to read: To recognise the local and regional benefits of electricity transmission, distribution and renewable electricity generation activities; and provide</i> for their development, operation, maintenance and upgrading to meet the needs of Te Tai o Poutini/the West Coast.
Horticulture New Zealand (S486)	S486.014	Energy	ENG - O1	Support	The importance of electricity infrastructure to the community is recognised.	Retain ENG-O1
Westpower Limited (S547)	S547.074	Energy	ENG - O1	Amend	The matters raised in the objective are broadly supported however the objective is a mix of two different matters, i.e. recognition of benefits and undertaking of activities. These matters should be separated for clarity, with the new objective proposed providing for one aspect (i.e. undertaking activities).	(1) Amend existing ENG-01, " To recognise and provide for local, regional and national benefits of renewable electricity generation, transmission, distribution and supply activities. ". (2) Add the new objective set out under "Energy Objectives" above, " ENG-?? To enable the safe, efficient and integrated development, operation, maintenance and upgrading of Energy Activities, including related Infrastructure and Critical Infrastructure, to meet the needs of the West Coast/Te Tai o Poutini. "
Royal Forest and Bird Protection Society of New	S560.109	Energy	ENG - O1	Support		Retain as notified

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Zealand Inc. (Forest & Bird) (S560)						
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.039	Energy	ENG - O2	Support	We support this objective.	Retain objective.
Transpower New Zealand Limited (S299)	S299.030	Energy	ENG - O2	Support	Transpower supports this objective, and particularly that it recognises functional and operational need for energy activities.	Retain the objective
Manawa Energy Limited (Manawa Energy) (S438)	S438.037	Energy	ENG - O2	Support in part	Manawa considers that the use of the term 'minimise' is not consistent with terminology used in current Resource Management Act legislation, and therefore it is unclear what the level of outcome anticipated by this term involves. Manawa requests that the term 'minimise' should be replaced with the with 'avoid, remedy or mitigate' terminology provided by the Act as in different circumstances different aspects of the effects management hierarchy may be appropriate. Manawa also requests that the wording of policy be restructured to provide greater clarity and direction to Plan users, and that reference to functional and operational needs be retained to ensure consistency in terminology used in other national policy documents.	Amend ENG - O2 as follows: To recognise the functional and operational needs associated with the location and design of renewable electricity generation energy activities, and to minimise avoid, remedy or mitigate any adverse effects of these activities on communities and the environment.
Buller Electricity Limited (S451)	S451.021	Energy	ENG - O2	Support in part		the objective should be reworded as follows: <i>Have particular regard to the constraints imposed by the technical, locational and operational requirements when seeking to avoid, remedy or mitigate adverse effects on communities and the environment from an energy activities</i>

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<i>design and location.</i>
Frank and Jo Dooley (S478)	S478.078	Energy	ENG - O2	Support in part		the objective should be reworded as follows: <i>Have particular regard to the constraints imposed by the technical, locational and operational requirements when seeking to avoid, remedy or mitigate adverse effects on communities and the environment from an energy activities design and location.</i>
Westpower Limited (S547)	S547.076	Energy	ENG - O2	Amend	The objective is a mix of two matters.	Amend: To recognise and provide for the technical, functional, and operational and locational needs associated with the location and design of Energy Activities, including Critical Infrastructure. and to minimise adverse effects of these activities on communities and the environment.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.110	Energy	ENG - O2	Oppose	'Minimise' is not an appropriate effects management standard.	Delete objective;
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.445	Energy	ENG - O2	Amend	Significant adverse effects could still be caused even where they have first been minimised.	amend so that the objective (and any energy activities covered in this chapter) is limited to electricity distribution and supply and renewable electricity generation,
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.446	Energy	ENG - O2	Amend	Significant adverse effects could still be caused even where they have first been minimised.	minimise is changed to avoid, remedy or mitigate in accordance with the Natural Environment and District Wide chapters of this Plan.
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.040	Energy	ENG - O3	Support	We support this objective.	Retain objective.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Transpower New Zealand Limited (S299)	S299.031	Energy	ENG - O3	Support	Transpower supports the objective noting that ENG-O4 is specific to the National Grid and gives effect to the NPSET.	Retain the objective
Manawa Energy Limited (Manawa Energy) (S438)	S438.038	Energy	ENG - O3	Support in part	Manawa supports the recognition of the need to provide for renewable electricity generation and the recognition of the potential for reverse sensitivity effects on renewable electricity generation activities (as is required to be addressed in the NPS - REG). It is however considered better to separate these two concepts for clarity. It is also suggested that terminology used is amended to ensure consistency with earlier comments and terminology used in the Resource Management Act 1991.	Amend ENG - O3 as follows: To provide for the development, operation, maintenance and upgrade of energy renewable electricity generation activities and to protect them from the adverse effects of incompatible subdivision, use and development
Buller Electricity Limited (S451)	S451.022	Energy	ENG - O3	Support in part	The objective should be amended to give effect to the RPS	Amend objective to read To provide for the enable the development, operation, maintenance and upgrade of <i>energy activities</i> , and to protect them from the adverse effects of incompatible subdivision and development.
Frank and Jo Dooley (S478)	S478.079	Energy	ENG - O3	Support in part	The objective should be amended to give effect to the RPS	Amend objective to read To provide for the enable the development, operation, maintenance and upgrade of <i>energy activities</i> , and to protect them from the adverse effects of incompatible subdivision and development.
Horticulture New Zealand (S486)	S486.015	Energy	ENG - O3	Support in part	As stated above HortNZ does not support the focus on 'protection'. The focus on providing for energy activities should be that they are not compromised by adverse effects of incompatible subdivision and development - rather than a 'protection'.	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 development.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Federated Farmers of New Zealand (S524)	S524.033	Energy	ENG - O3	Support in part	The focus on providing for energy activities should be that they are not compromised by adverse effects of incompatible subdivision and development - rather than a 'protection'.	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 development.
Westpower Limited (S547)	S547.078	Energy	ENG - O3	Amend	The matters raised in the objective are broadly supported however the objective is a mix of two different matters, i.e. undertaking of activities and protection from incompatible activities. These matters should be separated for clarity, with the new objective proposed providing for one aspect (i.e. undertaking activities). This would also be consistent with the provisions of the RPS.	(1) Add the new objective set out under "Energy Objectives" above, "ENG-?? To enable the safe, efficient and integrated development, operation, maintenance and upgrading of Energy Activities, including related Infrastructure and Critical Infrastructure, to meet the needs of the West Coast/Te Tai o Poutini." (2) With the new objective added amend existing ENG-03 to read, " To protect Energy Activities, including Critical Infrastructure, from the adverse effects of incompatible subdivision, use and development. "
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.111	Energy	ENG - O3	Oppose	This is too broad, and should be limited to electricity generation, distribution and supply and renewable energy generation.	Delete
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.447	Energy	ENG - O3	Amend	The objective is also a blanket enabling provision and says nothing about the need to address adverse effects.	Amend: To provide for the development, operation, maintenance and upgrade of electricity generation, distribution and supply and renewable energy generation energy activities where adverse effects can be appropriately avoided, remedied or mitigated in accordance with the Natural Environment and District Wide chapters of this Plan and to protect them from the adverse effects of incompatible subdivision

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						and development.
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.041	Energy	ENG - O4	Support	We support this objective.	Retain objective.
Transpower New Zealand Limited (S299)	S299.032	Energy	ENG - O4	Support	Transpower supports this objective as it specifically recognises the significance of the National Grid and the criticality of its continuing and safe operation. The objective informs the policies and gives effect to the NPSET. It also gives effect to Chapter 6 policies 2, 4 and 7 of the RPS.	Retain the objective
Buller Electricity Limited (S451)	S451.024	Energy	ENG - O4	Amend		Amend objective to read as follows: <i>To recognise and provide for the national, regional and local significance and benefits of the National Grid, by ensuring the safety, efficiency, operation, maintenance, repair, upgrade and development is not adversely affected by incompatible subdivision, use and development.</i>
Frank and Jo Dooley (S478)	S478.081	Energy	ENG - O4	Amend		Amend objective to read as follows: <i>To recognise and provide for the national, regional and local significance and benefits of the National Grid, by ensuring the safety, efficiency, operation, maintenance, repair, upgrade and development is not adversely affected by incompatible subdivision, use and development.</i>

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Horticulture New Zealand (S486)	S486.016	Energy	ENG - O4	Support	A policy to recognise and provide for the National Grid is consistent with the NPS-ET.	Retain ENG-O4
Federated Farmers of New Zealand (S524)	S524.034	Energy	ENG - O4	Support	A policy to recognise and provide for the National Grid is consistent with the NPS-ET.	Retain ENG-O4
Manawa Energy Limited (Manawa Energy) (S438)	S438.045	Energy	Energy Policies	Support	<p>The energy chapter covers generation, transmission and distribution of electricity. It inherently covers both renewables and non-renewables, however there is no provision for non-renewable energy nor any deterrent to non-renewable electricity activities being established. Non-renewable electricity generation is not supported by national direction and this needs to be made clear in the chapter.</p> <p>It is considered inappropriate that non-renewable energy activities, by virtue of inclusion within the definition of 'energy activities', are considered in the same manner as renewable electricity generation activities given the NPS that applies solely to these activities (NPS - REG 2011). Manawa requests that the wording is amended throughout the Plan to refer to Renewable Electricity Generation (as opposed to energy activities) in all supporting policies. Further it requests that a policy be added to avoid the development of non-renewable energy generation activities on the West Coast, and facilitate the replacement of non-renewable energy sources, including the use of fossil fuels, in electricity generation.</p>	<p>Add a new policy as follows: ENG - P10</p> <p>Avoid the development of non-renewable electricity generation activities on the West Coast and facilitate the replacement of non-renewable energy sources, including the use of fossil fuels, in electricity generation.</p>
Buller Electricity Limited (S451)	S451.034	Energy	Energy Policies	Amend	A new Policy ENG - 10 to provide a clear "line of sight" between any of the policies	Include a new policy as follows: <i>Avoid radio, electric and magnetic fields that do not meet the applicable New Zealand or</i>

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					as notified (ENG - P1 to ENG - P9) and Energy Rule 1 (ENG - R1).	<i>International standards or guidelines, or National Environmental Standards.</i>
Frank and Jo Dooley (S478)	S478.091	Energy	Energy Policies	Amend	A new Policy ENG - 10 to provide a clear "line of sight" between any of the policies as notified (ENG - P1 to ENG - P9) and Energy Rule 1 (ENG - R1).	Include a new policy as follows: <i>Avoid radio, electric and magnetic fields that do not meet the applicable New Zealand or International standards or guidelines, or National Environmental Standards.</i>
Buller District Council (S538)	S538.018	Energy	Energy Policies	Support	Council supports the objectives and policies for Energy Activities.	Retain as notified.
Westpower Limited (S547)	S547.080	Energy	Energy Policies	Amend	Fragments "Energy Activities" from "Infrastructure" using a range of terms.	Amend to ensure consistency of terms and provisions for energy activities throughout the plan.
Westpower Limited (S547)	S547.081	Energy	Energy Policies	Amend	there is also provision for the "Significant Electricity Distribution Line"	Add a new Policy: Manage activities in and around Significant Electricity Distribution Lines to: a. Ensure the safe and efficient operation, maintenance, repair, upgrading and development of the lines are not compromised by subdivision, use and/or development;b. Avoid incompatible land use;c. Achieve compliance with the New Zealand Electrical Code of Practice for Electrical Safe Distances (NZCEP 34:2001) and avoid health and safety risks from distribution lines; andd. Avoid potential reverse sensitivity effects on distribution lines.
Westpower Limited (S547)	S547.082	Energy	Energy Policies	Amend	it is relevant to have policy provision in this chapter for subdivision.	Add a new Policy: Ensure that subdivision and development is adequately serviced including; a. supply of electricity using a method that is appropriate to the type of subdivision and/or development, including consideration of alternative methods on a case by case basis, and b. where new

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						energy infrastructure is developed and/or installed, that there is adequate provision for ongoing access, operation and maintenance, including through granting and reserving easements.
Westpower Limited (S547)	S547.083	Energy	Energy Policies	Amend	The adoption of new technology would apply to energy activities.	New Policy: Provide flexibility for energy activities, including energy aspects of infrastructure and critical infrastructure, to adopt new technologies that; a. improve access to, and efficient use of, networks and services;b. allow for the re-use of redundant services and structures where they are safe and operating to required standards;c. increase resilience, safety or reliability of networks and services;d. result in environmental benefits and/or enhancements; ore. promote environmentally sustainable outcomes including green infrastructure and the increased utilisation of renewable resources.
Chris & Jan Coll (S558)	S558.439	Energy	Energy Policies	Support		Retain
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.440	Energy	Energy Policies	Amend		Make consequential amendments to all referencing of overlay chapters and other relevant provisions to ensure that all ECO chapter provisions apply.
Chris J Coll Surveying Limited (S566)	S566.439	Energy	Energy Policies	Support		Retain
William McLaughlin (S567)	S567.049	Energy	Energy Policies	Support		Retain

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Laura Coll McLaughlin (S574)	S574.439	Energy	Energy Policies	Support		Retain
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.042	Energy	ENG - P1	Support	We support this policy.	Retain policy.
Transpower New Zealand Limited (S299)	S299.033	Energy	ENG - P1	Support	Transpower supports this policy, noting that policies ENG-P7, ENG-P8 and ENG-P9 are specific to the National Grid.	Retain the policy
Buller Electricity Limited (S451)	S451.025	Energy	ENG - P1	Support in part	Buller Electricity seeks minor amendments to enable minor upgrading of important infrastructure in order to give effect to Policy 5 of the NPSET that requires ..."decision-makers must enable the reasonable operational, maintenance and minor upgrade requirements of established electricity transmission assets."	Amend to read: <i>Provide for and enable</i> the development, operation, maintenance and upgrading of <i>existing and new electricity transmission, distribution and renewable generation infrastructure and assets.</i>
Frank and Jo Dooley (S478)	S478.082	Energy	ENG - P1	Support in part	Buller Electricity seeks minor amendments to enable minor upgrading of important infrastructure in order to give effect to Policy 5 of the NPSET that requires ..."decision-makers must enable the reasonable operational, maintenance and minor upgrade requirements of established electricity transmission assets."	Amend to read: <i>Provide for and enable</i> the development, operation, maintenance and upgrading of <i>existing and new electricity transmission, distribution and renewable generation infrastructure and assets.</i>
Westpower Limited (S547)	S547.084	Energy	ENG - P1	Amend	Whilst the intent of this policy is supported an amendment is required to ensure that it includes all aspects of Energy Activities, particularly given the multiple terms and definitions that may apply to energy	(1) Amend ENG-P1, "Provide for the development ... and upgrading of existing and new Energy Activities, including energy related aspects of Infrastructure and Critical Infrastructure. "
Royal Forest and Bird Protection	S560.112	Energy	ENG - P1	Amend	Agree that it is appropriate to provide for these activities, however, there needs to	Add to the policy: while addressing adverse effects of these activities in

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Society of New Zealand Inc. (Forest & Bird) (S560)					be clear direction as to how to address adverse effects.	accordance with the Natural Environment and District Wide chapters of this Plan.
Manawa Energy Limited (Manawa Energy) (S438)	S438.00144	Energy	ENG - P1	Amend	Manawa supports the intent of this policy, however, considers that it that this policy: <ul style="list-style-type: none"> • mixes support for activities with management of effects • mixes transmission, distribution and generation without differentiating between various types of 'energy' activities • does not include a reference to renewable electricity generation activities specifically. 	Provide for Enable the development, operation, maintenance and upgrading of existing and new electricity transmission, distribution and renewable electricity generation activities and assets , while recognising the positive social, economic, cultural and environmental benefits of renewable electricity generation and transmission.
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.043	Energy	ENG - P2	Support in part	We strongly support clause (h) Meeting New Zealand/Aotearoa and Te Waipounamu's climate change obligations. We recognise that there may be a potential for conflict between the components of clause (c) economic, social, environmental or cultural wellbeing and clause (h), so including some indication of how these different considerations are weighted would assist users of the Plan.	Retain policy and provide an explanation of the weighting benefits to be obtained from a proposal, for example benefits to economic, social, environmental or cultural wellbeing, in conflict with meeting Aotearoa and Te Waipounamu's climate change obligations.
Transpower New Zealand Limited (S299)	S299.034	Energy	ENG - P2	Support	Transpower supports this policy noting that policies ENG-P7, ENG-P8 and ENG-P9 are specific to the National Grid.	Retain the policy
Manawa Energy Limited (Manawa Energy) (S438)	S438.039	Energy	ENG - P2	Support in part	Manawa generally supports this policy, however requests that changes are made to provide clarity that the intent of the policy is to include new activities, as well as existing activities.	Amend ENG - P2 as follows: When considering proposals to develop and operate new and existing energy renewable electricity generation, electricity transmission and distribution activities, have particular regard to the benefits to be obtained from the proposal, including: a. Maintaining or increasing security of

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						renewable electricity supply by diversifying the type and/or location of renewable electricity generation.....
Suzanne Hills (S443)	S443.015	Energy	ENG - P2	Amend	There is no consideration of cumulative effects of multiple small scale run-of-river hydro schemes that would result in the degradation of multiple wild rivers/creeks compared with generation benefits of larger schemes on already degraded landscapes or utility scale wind. The wild unmodified creeks and rivers of the West Coast are an asset to nature tourism, public recreation and ecosystem health and integrity. With the majority of rivers around the globe now modified in some form, we should be placing the highest value on the remaining wild creeks and rivers of the West Coast.	Amend policy to reflect the cumulative effect of multiple hydro schemes.
Buller Electricity Limited (S451)	S451.026	Energy	ENG - P2	Support in part	The proposed Policy ENG - P2 is supported on the basis that it is generally consistent with Policy 1 of the NPSET. Buller Electricity however seeks minor amendments in order to be entirely consistent with this policy:	Amend to read: <i>When considering proposals to develop and operate new and existing energy activities, infrastructure and assets provide for have particular regard to the benefits to be obtained from the proposal, including;</i> a. <i>Maintaining or increasing security of renewable electricity supply by diversifying the type and/or location of electricity generation;</i> orb. <i>Maintaining or increasing renewable electricity generation capacity while avoiding, reducing or displacing greenhouse gas emissions;</i> orc. <i>Economic, social, environmental or cultural wellbeing;</i> ord. <i>The contribution the proposal will have towards New Zealand meeting its renewable electricity generation targets;</i> ore. <i>Effective transmission and distribution of electricity</i>

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<i>supply; orf. Facilitation and use of renewable energy; org. Security of electricity supply; and orh. Meeting New Zealand/Aotearoa me Te Waipounamu's climate change obligations.</i>
Inger Perkins (S462)	S462.028	Energy	ENG - P2	Amend	micro renewables and distributed energy generation can support the community and provide some resilience of supply in times of, for example, a major earthquake or storm when main power lines are down.	Amend the policy to support micro renewables and distributed energy generation
Frank and Jo Dooley (S478)	S478.083	Energy	ENG - P2	Support in part	The proposed Policy ENG - P2 is supported on the basis that it is generally consistent with Policy 1 of the NPSET. Buller Electricity however seeks minor amendments in order to be entirely consistent with this policy:	Amend to read: <i>When considering proposals to develop and operate new and existing energy activities, infrastructure and assets provide for have particular regard to the benefits to be obtained from the proposal, including;a. Maintaining or increasing security of renewable electricity supply by diversifying the type and/or location of electricity generation; orb. Maintaining or increasing renewable electricity generation capacity while avoiding, reducing or displacing greenhouse gas emissions; orc. Economic, social, environmental or cultural wellbeing; ord. The contribution the proposal will have towards New Zealand meeting its renewable electricity generation targets; ore. Effective transmission and distribution of electricity supply; orf. Facilitation and use of renewable energy; org. Security of electricity supply; and orh. Meeting New Zealand/Aotearoa me Te Waipounamu's climate change obligations.</i>
Westpower Limited (S547)	S547.085	Energy	ENG - P2	Amend	The intent of the policy is generally supported with the	(1) Amend the opening pre-amble of ENG-P2,

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					<p>following amendments required,</p> <p>(1) The first sentence could be seen to indicate that all energy activities require consent, and it is noted that the equivalent policy of the "Infrastructure" Chapter refers to management. Given that not all energy activities require a resource consent different terminology should be used.</p> <p>(2) To give effect to Policy 1, Chapter 6, of the RPS item "a." under this policy should be amended and split as it has two distinct requirements to achieve.</p> <p>(3) In terms of item "e." it is important that distribution is clearly identified as including supply to consumers.</p>	<p>"When managing the development and operation of new and existing energy activities ... from the proposal, including;".</p> <p>(2) Amend ENG-P2 "a." by splitting to create 2 new policy parts, "a. Maintaining and/or increasing security of renewable electricity supply." and "aa. Providing for a diversity of the type and location of renewable electricity generation.".</p> <p>(3) Amend e., "e. Effective ... distribution of electricity supply, including to consumer;".</p>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.113	Energy	ENG - P2	Amend	It is inappropriate to give higher consideration to energy activities than s6 matters or where this regard would conflict with a s7 matter.	Limit to definition of 'energy activities' as sought in Interpretation section of this submission.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.448	Energy	ENG - P2	Amend		Delete particular
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.449	Energy	ENG - P2	Amend	It is also unclear how 'develop and operate' should be determined with respect to existing energy activities.	Add maintain and upgrade with respect to existing.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.450	Energy	ENG - P2	Amend		Add: i. opportunities to reduce environmental impacts
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.451	Energy	ENG - P2	Amend		Add development to ENG - P8 a. if it is relevant to existing National Grid infrastructure
Toka Tū Ake EQC (S612)	S612.007	Energy	ENG - P2	Support	Support the building of community resilience and reduction of greenhouse gas emissions	No change
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.044	Energy	ENG - P3	Support	We agree that it is important to have buffering between sensitive land uses, especially residential, to minimise reverse sensitivity.	Retain policy.
Transpower New Zealand Limited (S299)	S299.035	Energy	ENG - P3	Amend	Transpower generally supports this policy, noting that policies ENG-P7, ENG-P8 and ENG-P9 are specific to the National Grid. However, the interpretation of the policy would be assisted by defining what is required by the term 'minimise'. Transpower is concerned with how the 'minimise' requirement would be applied.	Retain the policy but define 'minimise', as per other submission points
Manawa Energy Limited (Manawa Energy) (S438)	S438.040	Energy	ENG - P3	Support in part	Manawa supports the intent of this policy, however, considers that it could be expressed in a manner more consistent with a similar policy included in the INF chapter (policy 3) and more closely aligned to the approach directed by the NPS-REG.	Amend ENG - P3 as follows: Minimise Avoid reverse sensitivity effects from incompatible subdivision, use and development on energy-renewable electricity generation and electricity transmission and distribution activities. and protect energy activities from adverse effects to ensure their ongoing operation, maintenance, upgrade or development
Buller Electricity Limited (S451)	S451.027	Energy	ENG - P3	Oppose	Buller Electricity opposes this policy and requests that it is reworded in order to give effect to Policy 10 in the NESET	Amend policy to read: <i>Avoid reverse sensitivity effects from subdivision, use and development on electricity distribution</i>

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<i>and transmission assets, existing renewable electricity generation activities and associated infrastructure, and protect such infrastructure from adverse effects of activities on the operation, maintenance, upgrading or development of that infrastructure.</i>
Frank and Jo Dooley (S478)	S478.084	Energy	ENG - P3	Oppose	Buller Electricity opposes this policy and requests that it is reworded in order to give effect to Policy 10 in the NESET	Amend policy to read: <i>Avoid reverse sensitivity effects from subdivision, use and development on electricity distribution and transmission assets, existing renewable electricity generation activities and associated infrastructure, and protect such infrastructure from adverse effects of activities on the operation, maintenance, upgrading or development of that infrastructure.</i>
Horticulture New Zealand (S486)	S486.017	Energy	ENG - P3	Support in part	As stated above HortNZ does not support the focus on 'protection'. The focus on providing for energy activities should be that they are not compromised by adverse effects of incompatible subdivision and development - rather than a 'protection'.	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.
Federated Farmers of New Zealand (S524)	S524.035	Energy	ENG - P3	Support in part	The focus on providing for energy activities should be that they are not compromised by adverse effects of incompatible subdivision and development - rather than a 'protection'.	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.
Westpower Limited (S547)	S547.088	Energy	ENG - P3	Amend	the wording is not sufficient to give effect to the issue, or the RPS.	Amend to read: Protect energy activities, including energy aspects of infrastructure and critical infrastructure, from the reverse sensitivity

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						effects arising from incompatible new subdivision, use and development, and the adverse effects of other activities, which would compromise the effective operation, maintenance, upgrading or development of energy activities and associated infrastructure .
Heritage New Zealand Pouhere Taonga (S140)	S140.010	Energy	ENG - P4	Support	HNZPT supports Policy ENG-P4 which seeks to minimise any actual or potential effects from new energy activities when located within or adjacent to historic heritage items or areas.	Retain policy as proposed
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.045	Energy	ENG - P4	Support	We strongly support this policy and we agree that it is important to have adequate buffering between sensitive land uses, especially considering residential zones to minimise reverse sensitivity.	Retain policy.
Transpower New Zealand Limited (S299)	S299.036	Energy	ENG - P4	Amend	Transpower generally supports the policy, noting that policies ENG-P7, ENG-P8 and ENG-P9 are specific to the National Grid. However, as identified in other submission points, the interpretation of the policy would be assisted by defining what is required by the term 'minimise'. Transpower is concerned with how the 'minimise' requirement would be applied.	Retain the policy but define 'minimise', as per other submission points.
Manawa Energy Limited (Manawa Energy) (S438)	S438.042	Energy	ENG - P4	Support in part	Manawa supports the intent of this policy, however, considers that it needs to be updated to clearly reference renewable electricity generation and to use established terminology that is well understood rather than 'minimise'.	Amend ENG - P4 as follows: Minimise Avoid, remedy or mitigate adverse effects on communities and the environment from energy-renewable electricity generation and electricity transmission and distribution activities by: <ul style="list-style-type: none"> • Having regard to ...
Buller Electricity Limited (S451)	S451.028	Energy	ENG - P4	Amend	The proposed Policy ENG - P4 is generally supported however a minor amendment is sought as the use of	Replace the word "minimise" with "manage" in the policy.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					"minimise" in the opening clause is concerning because: - the subsequent clauses seek a number of outcomes that are management approaches; - the term my imply that adverse effects must be made 'minimal' and this outcome may not always be possible; - the NESET does not require effects to be minimised in all circumstances, but refer to the effects being "managed" in the objectives and "avoided, remedied or mitigated" in Policies 3 and 4.	
Frank and Jo Dooley (S478)	S478.085	Energy	ENG - P4	Amend	The proposed Policy ENG - P4 is generally supported however a minor amendment is sought as the use of "minimise" in the opening clause is concerning because: - the subsequent clauses seek a number of outcomes that are management approaches; - the term my imply that adverse effects must be made 'minimal' and this outcome may not always be possible; - the NESET does not require effects to be minimised in all circumstances, but refer to the effects being "managed" in the objectives and "avoided, remedied or mitigated" in Policies 3 and 4.	Replace the word "minimise" with "manage" in the policy.
Westpower Limited (S547)	S547.089	Energy	ENG - P4	Amend	The intent of the Act and the following parts of the policy is management.	Minimise Manage adverse effects on the environment from energy activities by: ...
Westpower Limited (S547)	S547.090	Energy	ENG - P4	Amend	This policy requires some amendment toe sure the outcomes sought are achieved in a manner appropriate to energy activities, the role they play in the community, and the environment. (1) As discussed above there are potential issues with	1) Amend the preamble to ENG-P4, "Manage adverse effects on the environment from energy activities by:." (2) Amend item a., "a. Having regard to the values associated with areas identified as having significant environmental values, outstanding and high natural character areas outstanding landscapes and features, Poutini Ngai

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					<p>reference to a requirement to "minimise" all effects when the intent of the Act and the following parts of the policy is management. It is also noted that the wording differs to the equivalent "Infrastructure" policy, ie adverse effects on the environment, and amendment is required in that regard.</p> <p>(2) Item "a." is aimed at the overlay chapters but appears to have wording related to zone provisions (i.e. Urban Amenity, Recreational Areas) which the plan specifically advises the Energy Activity chapter is not subject to. This wording should be amended to reflect the intent of the proposed plan. Accordingly "a." should be amended to remove these matters.</p> <p>(3) Item "c." should be amended to appropriately provide for related infrastructure and assets, rather than elements and structures, and should also include maintenance of access for "operation".</p>	<p>Tahu and heritage sites, and significant natural areas;".</p> <p>(3) Amend item c., "c. Maintaining ongoing access to grid and distribution infrastructure and assets for operation, maintenance and upgrading works; and".</p>
Westpower Limited (S547)	S547.091	Energy	ENG - P4	Amend	To provide for infrastructure and assets and include access for operation and maintenance.	c. Maintaining ongoing access to grid and distribution elements and structures for infrastructure and assets for operation , maintenance and upgrading works; and ...

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.114	Energy	ENG - P4	Oppose	This policy purports to deal with adverse effects in a totally deficient way. Effects must be managed in accordance with the WCRPS, and the other chapters in the Plan, e.g., ECO.	Delete
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.084	Energy	ENG - P4	Amend	Offers some protection to outstanding landscapes it does not offer the same protection to cultural landscapes as required by other plan provisions.	Amend to include the following wording: Minimise adverse effects on communities and the environment from energy activities by: a. Having regard to the values associated with areas identified as having significant environmental values, urban amenity, areas of high recreational value, outstanding and high natural character areas, outstanding landscapes and features, Poutini Ngāi Tahu sites, areas and cultural landscapes , and heritage sites, and significant natural areas; b. Implementing industry best management practices around electrical safe distances; c. Maintaining ongoing access to grid and distribution elements and structures for maintenance and upgrading works; and d. Avoiding exposure to health and safety risks.
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.046	Energy	ENG - P5	Support	We support this policy.	Retain policy.
Transpower New Zealand Limited (S299)	S299.037	Energy	ENG - P5	Amend	Specific to clause b. of the policy, 'transmission infrastructure' is not defined in the proposed plan, rather transmission lines are (to which Transpower has submitted seeking amendment to the definition reflect that provided in the NESETA). Transpower supports the intent of this policy, however the way it is	Amend the policy as follows: ENG-P5 When considering proposals to develop, operate, maintain and upgrade new and existing energy activities: Recognise their functional constraints and operational requirements; and Where new transmission infrastructure significant electricity distribution lines and major

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					currently drafted it appears that (b) would apply to the National Grid. On the basis of the specific National Grid policy ENG-P7, Transpower seeks either deletion or modification of clause b so that it does not apply to transmission activities which are undertaken by the National Grid. It is not necessary or efficient to have policies specific to the National Grid.	upgrades to transmission infrastructure significant electricity distribution lines are proposed have regard to the extent to which any adverse effects have been minimised in the route, site and method selection.
Manawa Energy Limited (Manawa Energy) (S438)	S438.043	Energy	ENG - P5	Support in part	Manawa requests that amendments are made to this policy to ensure consistency throughout the Plan in the use of defined terms and in referencing renewable electricity rather than energy generally.	a. Amend ENG - P5 as follows: When considering proposals to develop, operate, maintain and upgrade new and existing energy renewable electricity generation activities: Recognise their functional needs needs constraints and operational needs requirements ; and ...
Buller Electricity Limited (S451)	S451.029	Energy	ENG - P5	Support in part	The proposed Policy ENG - P5 is generally supported however the following minor amendment is sought in order to give effect to the RPS	<i>When considering proposals to develop, operate, maintain and upgrade new and existing energy activities, infrastructure and assets:</i> a. Recognise Have particular regard to the constraints imposed by their functional constraints and operational requirements; and b. Where new transmission infrastructure and major upgrades to transmission infrastructure are proposed have regard to the extent to which any adverse effects have been minimised managed in the route, site and method selection.
Frank and Jo Dooley (S478)	S478.086	Energy	ENG - P5	Support in part	The proposed Policy ENG - P5 is generally supported however the following minor amendment is sought in order to give effect to the RPS	<i>When considering proposals to develop, operate, maintain and upgrade new and existing energy activities, infrastructure and assets:</i> a. Recognise Have particular regard to the constraints imposed by their functional constraints and operational requirements; and b. Where new transmission infrastructure and major

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<i>upgrades to transmission infrastructure are proposed have regard to the extent to which any adverse effects have been minimised managed in the route, site and method selection.</i>
Westpower Limited (S547)	S547.092	Energy	ENG - P5	Amend	Not all energy activities require a resource consent different terminology should be used.	Amend: When considering proposals to develop, operate, maintain and upgrade managing the development, operation, maintenance and upgrading of new and existing energy activities; ...
Westpower Limited (S547)	S547.093	Energy	ENG - P5	Amend	(1) The first sentence could be seen to indicate that all energy activities require consent and it is noted that the equivalent policy of the "Infrastructure" Chapter refers to management. Given that not all energy activities require consent, and for consistency, different terminology should be used. (2) Item "a." needs to be reworded to give effect to Policy 3, Chapter 6, of the RPS and to provide consistency of wording and interpretation	(1) Amend the opening pre-amble of ENG-P5, "When managing the development, operation, maintenance and upgrading of new and existing energy activities;" . (2) Amend item a., "a. Have particular regard to function, location, technical and operation constraints and requirements of the related activities and infrastructure; and"..
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.115	Energy	ENG - P5	Amend	It is not clear what the functional constraints or operational requirements for energy activities would be that should require specific consideration.	Limit to definition of energy activities as sought in Interpretation section of this submission.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.453	Energy	ENG - P5	Amend	The policies lack integration with overlays provisions and chapter provisions which provide for s6 RMA matters.	When considering proposals to develop, operate, maintain, and upgrade new and existing energy activities: a. Recognise their functional constraints and operational requirements recognise that natural character, outstanding and

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						significant natural values are to be protected and that adverse effects on the environment are to be avoided, remedies or mitigated in accordance with the Natural Environment and District Wide chapters of this Plan." ; and ...
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.454	Energy	ENG - P5	Amend		Amend policies to remove conflicts and improve integration with overlay provisions and provide for s6 matters.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.455	Energy	ENG - P5	Amend		Amend the chapter overview to ensure that overlay chapters (including the provisions that apply more generally) and district wide chapters are also to be considered for energy activities.
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.047	Energy	ENG - P6	Support	We support this policy.	Retain policy.
Transpower New Zealand Limited (S299)	S299.038	Energy	ENG - P6	Support	Transpower supports this policy, noting that policies ENG-P7, ENG-P8 and ENG-P9 are specific to the National Grid.	Retain the policy
Manawa Energy Limited (Manawa Energy) (S438)	S438.044	Energy	ENG - P6	Support	Manawa supports the intent of the policy, however requests that there is no distinction made between varying scales of renewable generation activities.	Amend ENG - P6 as follows: Provide for the development, upgrading, maintenance and operation of: a. A range of small, community and large scale renewable electricity generation activities; and b. ...
Buller Electricity Limited (S451)	S451.030	Energy	ENG - P6	Support		Retain as notified
Frank and Jo Dooley (S478)	S478.087	Energy	ENG - P6	Support		Retain as notified

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Westpower Limited (S547)	S547.094	Energy	ENG - P6	Support		Retain
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.116	Energy	ENG - P6	Support	The policy is specific to renewable electricity generation, which we support.	Retain as specific to renewable energy generation.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.443	Energy	ENG - P6	Amend	Direction must be given as to how adverse effects must be managed.	Amend: where the adverse effects are avoided, remedied, or mitigated in accordance with the Natural Environment and District Wide chapters of this Plan.
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.048	Energy	ENG - P7	Support	We support this policy.	Retain policy.
Transpower New Zealand Limited (S299)	S299.039	Energy	ENG - P7	Amend	Transpower supports this policy as it gives effect to the NPSET and the RPS. Minor amendments to (c)(ii) to reflect that activities might include new infrastructure or major upgrades.	Amend the policy as follows: ENG-P7 Recognise and provide for the national, regional and local benefits of the National Grid, including by: Enabling the operation, maintenance and minor upgrading requirements of existing National Grid assets; Providing for other upgrades and the effective development of new National Grid assets; and When considering measures to avoid, remedy and mitigate adverse effects of National Grid activities, have regard to: The technical and operational constraints of the National Grid; and The extent to which proposals for new National Grid infrastructure or major upgrades to existing National Grid infrastructure have avoided, remedied and mitigated effects through the route, site and method selection.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Buller Electricity Limited (S451)	S451.031	Energy	ENG - P7	Support		Retain as notified
Frank and Jo Dooley (S478)	S478.088	Energy	ENG - P7	Support		Retain as notified
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.117	Energy	ENG - P7	Amend	Avoid, remedy, and mitigate needs to be in other policies for this policy to make sense - however with the amendments sought above this will be solved.	Delete ENG - P7
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.452	Energy	ENG - P7	Amend	Alternative relief	retain the policy and include ' avoid, remedy and mitigate in accordance with the Natural Environment and District Wide chapters of this Plan ' in both this policy and other ENG policies.
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.049	Energy	ENG - P8	Support	We support this policy.	Retain policy.
Transpower New Zealand Limited (S299)	S299.040	Energy	ENG - P8	Amend	Transpower is generally supportive of this policy as it gives effect to the NPSET (and in particular the 'seek to avoid' direction in Policy 8 of the NPSET), but it requires amendments to provide appropriate application of the seek to avoid approach. Transpower has requested changes to reflect this. Transpower also notes that not all of the Schedules are relevant to this policy, and therefore requests that references to 'Schedules' are amended to refer specifically to 'Schedules 1-8' only. There may be potential for some conflict between this policy and others in the Plan. Transpower seeks an amendment to this policy to make it clear that this policy takes precedence, reflecting the national, regional and local significance of the National Grid. An amendment is	Amend the policy as follows: ENG-P8 Manage the adverse effects of the National Grid by: Where appropriate, using substantial upgrades as an opportunity to reduce existing adverse effects Seeking to avoid adverse effects on areas identified in Schedules 1-8 ; Where the National Grid has a functional or operational need to locate within the Coastal Environment, manage adverse effects by: Seeking to avoid adverse effects on Overlay Chapter areas identified in Schedules 1-8 and where it is not practicable to avoid, to remedy or mitigate; Where it is not practicable to avoid adverse effects on the values of the areas identified in Schedules 1-8 because of the functional needs or operational needs of the National Grid, remedy or mitigate adverse effects on

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					also sought to clause d. so that it only applies to the coastal environment, thereby reconciling the NPSET and NESETA. Outside the Coastal Environment, such a directive is not appropriate in context of the NPSET. A new clause d. is sought to provide a catch all requirement to remedy or mitigate other adverse effects.	those values. Seeking to avoid significant adverse effects on: other areas of natural character natural attributes and character of other natural features and natural landscapes indigenous biodiversity values that meet the criteria in Policy 11(b) of the NZCPS 2010. seeking to avoid significant adverse effects on other areas of natural character, natural attributes and character of natural features and landscapes and indigenous biodiversity values that meet the criteria in Policy 11(b) of the NZCPS 2010; and d. v. Recognise that there may be some areas within the sites and areas identified in Schedules 1-8 where avoidance of adverse effects is required to protect the identified values and characteristics. d. Remedy or mitigate any adverse effects from the operation, maintenance, upgrade, major upgrade or development of the National Grid which cannot be avoided, to the extent practicable. In the event of any conflict with any other objectives and policies within the Plan, Policy ENG-P8 takes precedence.
Buller Electricity Limited (S451)	S451.032	Energy	ENG - P8	Support		Retain as notified
Frank and Jo Dooley (S478)	S478.089	Energy	ENG - P8	Support		Retain as notified
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.118	Energy	ENG - P8	Amend	Clarify what a substantial upgrade is compared with other upgrades.	Amend: Clarify what 'substantial' means

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.456	Energy	ENG - P8	Amend	This is because P8 focuses on scheduled areas which do not adequately capture significant natural areas	Amend to make clear that it is not only scheduled areas - for example, the majority of SNAs are not on schedules
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.457	Energy	ENG - P8	Amend	C. needs to be amended to give effect to the policy 11 requirements to avoid/avoid significant effects.	Amend c i. to refer to all areas with important values, including those identified in schedules and areas meeting significance criteria but not yet identified. ii. delete seek to iii. include a new subpara that requires avoidance of adverse effects on policy 11(a) NZCPS biodiversity
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.458	Energy	ENG - P8	Amend		Amend d: Recognise that there may be some attributes, character and biodiversity values areas within the sites and areas identified in Schedules where avoidance of adverse effects is required to protect the identified attributes, values and characteristics or values.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.459	Energy	ENG - P8	Amend	the terms "major upgrades", "substantial upgrades" and "minor upgrade" are both used in the NPS-ET in different context, those terms are not defined in the NPS-ET.	Define or otherwise include some guidance on the interpretation on the terms "major upgrades", "substantial upgrades" "minor upgrade" and "upgrade"
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.460	Energy	ENG - P8	Support	the policy direction for "seek to avoid" be considered "following a route, site and method selection process and having regard to the technical and operational constraints of the network"	Amend to capture requirements for route, site, and method selection process to consider alternatives to locating infrastructure in important natural areas.
Department of Conservation (S602)	S602.034	Energy	ENG - P8	Amend	Amend Policy ENG-P8 so that it aligns with the functional need definition of the Plan, applies the effects management hierarchy where adverse effects on scheduled or overlay items cannot be avoided, protects values identified in	Amend Policy ENG-P8: Manage the adverse effects of the National Grid by: a. Where appropriate, using substantial upgrades as an opportunity to reduce existing adverse effects; b. Seeking to avoid adverse effects on

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					schedules in addition to areas, and removes duplication.	<p>areas and values identified in Schedules SNA, and Overlay Areas and applying the effects management hierarchy where adverse effects cannot be avoided;</p> <p>c. Where the National Grid has a functional need or operational need to locate within the Coastal Environment, manage adverse effects by:</p> <p>d. Seeking to avoid adverse effects on Overlay Chapter areas and where it is not practicable to avoid, to remedy or mitigate;</p> <p>e. Seeking to avoid significant adverse effects on other areas of natural character, natural attributes and character of natural features and landscapes and indigenous biodiversity values that meet the criteria in Policy 11(b) of the NZCPS 2010; and</p> <p>f. recognise that there may be some areas within the sites and areas identified in Schedules where avoidance of adverse effects is required to protect the identified values and characteristics</p>
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.085	Energy	ENG - P8	Amend	Not all the schedules relate to areas that have values that need to be protected	Amend Policy references to 'Schedules' to be specifically to 'Schedules 1-8'
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.050	Energy	ENG - P9	Support	We strongly support this policy and we agree that it is important to have adequate buffering between sensitive land uses, especially considering residential zones to minimise reverse sensitivity.	Retain policy.
Transpower New Zealand Limited (S299)	S299.041	Energy	ENG - P9	Amend	<ul style="list-style-type: none"> Transpower is generally supportive of this policy as it gives effect to the NPSET, but requests amendments to: Make it clear what is meant by 	Amend the policy as follows: ENG-P9 Manage activities within the National Grid Yard and the National Grid Subdivision Corridor to: Ensure the safe and efficient

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					'incompatible land use' in terms of outlining the effects which are to be avoided. Ensure that (c) only applies within the National Grid Subdivision Corridor Retain provision for access for maintenance and upgrade works.	operation, maintenance, repair, upgrading and development of the National Grid is not compromised; Avoid incompatible land use, buildings and structures that may directly affect or otherwise compromise the National Grid or result in reverse sensitivity effects on the National Grid; Manage subdivision within the National Grid Subdivision Corridor to avoid subsequent land use activities from compromising the operation, maintenance, upgrading and development of the National Grid; Achieve compliance with the New Zealand Electrical Code of Practice for Electrical Safe Distances (NZECP 34: 2001) and avoid exposure to health and safety risks from the National Grid; Maintain ongoing access for maintenance and upgrading works on the National Grid; and Avoid potential for reverse sensitivity effects on the National Grid.
Buller Electricity Limited (S451)	S451.033	Energy	ENG - P9	Support		Retain as notified
Frank and Jo Dooley (S478)	S478.090	Energy	ENG - P9	Support		Retain as notified
Horticulture New Zealand (S486)	S486.018	Energy	ENG - P9	Support in part	The NPS-ET Policy 10 seeks that reverse sensitivity effects are avoided to the extent reasonably possible. The policy in the plan should be consistent with the NPSET.	Amend ENG-P9 e) Avoid, to the extent reasonably possible, potential for reverse sensitivity effects on the National Grid
Federated Farmers of New Zealand (S524)	S524.036	Energy	ENG - P9	Support in part	The NPS-ET Policy 10 seeks that reverse sensitivity effects are avoided to the extent reasonably possible.	Amend ENG-P10 e) Avoid, to the extent reasonably possible potential for reverse sensitivity effects on the National Grid

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Transpower New Zealand Limited (S299)	S299.042	Energy	Energy Rules	Oppose	<p>Transpower considers that point 1 does not provide sufficient clarity on the application of other chapters for energy activities. Transpower does not support the approach that other rules in the plan potentially apply. Such an approach does not achieve a stand-alone Energy chapter and provides an overly complicated and potentially contradictory rule framework for energy activities. Amendments are suggested to address this. Transpower supports the inclusion of points 2, 3 and 4 as they alert plan users to other enactments that may apply.</p>	<p>Amend the Energy Chapter so that it is self-contained, and reference to other chapters is not required. Amend the note as follows: Note: There may be a number of Plan provisions that apply to an activity, building, structure and site. In the case of Energy Activities, however, neither the objectives, policies and rules of the Infrastructure Chapter other chapters or the Part 3: Area Specific Matters do not apply. In some cases, consent may be required under rules in this Chapter as well as rules in other Chapters in the Plan. In those cases unless otherwise specifically stated in a rule, consent is required under each of those identified rules. Details of the steps Plan users should take to determine the status of an activity is provided in General Approach. Compliance with the New Zealand Code of Practice for Electrical Safe Distances (NZECO34: 2001) is mandatory under the Electricity Act 1992. All activities regulated by NZECP34:2001, including buildings, structures, earthworks and the operation of mobile plant, must comply with that regulation. Activities should be checked for compliance even if they are permitted by Te Tai o Poutini Plan. Vegetation to be planted around the National Grid should be selected and/or managed to ensure that it will not result in that vegetation breaching the Electricity (Hazards from Trees) Regulations 2003. For any activity that relates to the operation, maintenance and upgrading of existing National Grid transmission lines, the Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009</p>

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						apply.
Transpower New Zealand Limited (S299)	S299.051	Energy	Energy Rules	Support	The Energy Chapter does not appear to contain a catch-all rule for any activities not specifically provided for. Transpower seeks the inclusion of a new rule with discretionary activity status to provide for these activities.	Add a new rule as follows: ENG - RXX Any energy activity which is not a permitted, controlled, restricted discretionary or discretionary activity Activity Status Discretionary Activity status where compliance not achieved: N/A
Paul Finlay (S408)	S408.001	Energy	Energy Rules	Support	The West Coast must be able to be self sufficient in energy generation. The provision is for accessway for above ground pressure pipelines with regular holding down anchorages, tunneling where required and diversion of flood flow under the phenomena of Climate Change, increased rainfall and flooding to State Highways and tourist townships and infrastructure. The Wills River, tributary of the Haast River, Haast township is given. Tunnel to unknown, unnamed stream, increased flow to Hunter River, to Lake Hawea, and downstream Otago irrigation schemes.	That provision be made for and understanding of the critical need for the reliance on hydro power generation, in respect of resilience pre and post Alpine Fault Rupture, and Climate Change required irrigation.
Manawa Energy Limited (Manawa Energy) (S438)	S438.046	Energy	Energy Rules	Not Stated	Manawa is very supportive of the separation of rules applying to Renewable Electricity Generation activities from those relating to INF activities. Manawa's primary concern with the ENG rules is the extent to which these provide for the construction, operation, maintenance and upgrade of Renewable Electricity Generation activities in a manner consistent with the provisions of the NPS - REG 2011. This concern relates to the manner in which the Plan differentiates between Renewable Electricity Generation	See definitions requests above. Amend terminology used in the ENG chapter to reflect the relief sought for changes to definitions, especially defined terms of: <ul style="list-style-type: none"> • small and community- scale distributed electricity generation • minor upgrade • regionally significant infrastructure. Amend the structure of the rules to clearly step through the different activities relating to existing and new activities. Amend rules to ensure that activity status that applies gives effect to the NPS-REG

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					<p>activities of various types and scales (and the terminology used in the Plan to express these differences), and the activity status afforded to these activities. As presently set out, Manawa does not consider that the energy chapter provisions give effect to the NPS-REG as they do not enable continuation of existing activities and establishment of new activities.</p> <p>Definitions Specific submission points applying to Renewable Electricity Generation activities have been addressed in submissions on the Interpretation section of the Plan set out above. In particular, Manawa opposes the distinction between Renewable Electricity Generation activities based on the current definitions of the terms 'small scale', 'community scale' and 'large scale'. Manawa seeks to ensure that the terminology used in the pTTPP is consistent with that in the NPS - REG 2011. Manawa has also sought the inclusion of a definition for the term 'minor upgrade'. It considers that this is appropriate and is already used throughout the Plan.</p> <p>Manawa requests that the submission points in the remainder of this section reflect changes sought to terminology used in the Plan.</p> <p>Provision for the Operation, Maintenance, Upgrading and Establishment of Renewable Electricity Generation activities The rules mix activities relating to existing structures and facilities (operate, maintain, repair and upgrade) with</p>	<p>and other higher order documents</p>

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					<p>activities relating to new structures and facilities (construction). This confuses the direction and intent of the provisions (enabling ongoing operation, maintenance, repair and minor upgrading of new facilities to not be adequately provided for). Manawa requests that the structure of the rules be amended to clearly step through the differences in existing and new activities. Activity Status Manawa strongly opposes the activity status given to a number of Renewable Electricity Generation activities, and considers that this is inconsistent with the policy direction provided for in the NPS - REG. In particular activities relating to existing hydro-electric generation schemes are not provided for such that the maintenance of an existing "large scale" dam is a full discretionary activity. Such an activity is essentially for the safety and resilience of renewable electricity generation schemes on the West Coast and needs to be provided for. In terms of other Renewable Electricity Generation activities, Rule 5 in effect determines that a wind farm unable to meet the requirements of the NZS 6808:2010 (Acoustics - Wind Farm Noise) is assessed as a non-complying activity. Manawa considers that this is inappropriate, particularly when considering that if the rules in the noise chapter default to restricted discretionary if not met.</p> <p>These are inappropriate activity status, for renewable electricity generation activities that are determined to be nationally significant and a matter of</p>	

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					national importance. As outlined in the general section of this submission, support for existing renewables and provision for development of new renewables is a national priority and the current rules in the pTTPP do not sufficiently enable this to occur. Manawa requests that the rule structure be amended to better align with the intent for Renewable Electricity Generation activities as set out in higher order documents which can be summarised as: - Existing activity Operate Permitted Maintain/Repair Permitted Minor Upgrade Permitted Upgrade (more than Minor) Permitted (limited in scale) RD Larger scale New activityConstruct new Permitted (limited in scale) RD all other scale activitiesTemporary Permitted up to 24 months RD longer periodInvestigations and meteorological Permitted (limited in scale)RD larger scale Non-renewable electricity generation Electricity generation activities that are not renewable Non-complying	
Manawa Energy Limited (Manawa Energy) (S438)	S438.057	Energy	Energy Rules	Support	Manawa also considers that any energy activities that do not involve renewable electricity generation should be dealt with as non-complying activities. This would be consistent with the intent of the national policy framework, and New Zealand's climate change obligations.	Add a new rule ENG - R21: ENG-R21 Non-renewable Electricity Generation Activities Activity Status: Non-Complying
Inger Perkins (S462)	S462.030	Energy	Energy Rules	Amend	There should be a low-cost, streamlined approval process for small or micro renewable installations to encourage building-scale projects. Ideally, such projects should be incentivised and	Ensure rules allow for small and micro-renewable installations as a permitted activity.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					perhaps councils could channel government support.	
Buller District Council (S538)	S538.023	Energy	Energy Rules	Not Stated	There is no provision for operation, maintenance and repairs of existing below ground energy activities or provision for installation of new facilities, therefore Council seeks a new rule to address these. No performance standards are considered necessary.	Insert a new rule as follows: Operation, Maintenance, Repairs and Installation of Below Ground Energy Activities Activity Status Permitted
Buller District Council (S538)	S538.024	Energy	Energy Rules	Not Stated	<p>The rule framework does not allow for extension of existing transmission or distribution lines or installation of new transmission or distribution lines. As discussed in the Infrastructure Chapter, INF-R9 provides for new lines along with telecommunication poles or towers within the General Rural Zone or Industrial Zone. Council's submission on Rule INF-R9 is that it is out of context and should be placed in the Energy Chapter with the reference to 'telecommunication poles and towers' removed.</p> <p>Council also seeks that provision is made for the extension of existing distribution lines in the same manner as provided for in the BDP. The BDP enables the extension of existing overhead lines involving no more than five poles where the written consent from landowners within 22m radius of new poles has been obtained. This is considered important to support residential development where connection to services is generally required.</p>	<p>Insert a new rule as follows: Installation of Above Ground Energy Activities Activity Status Permitted Where: 1. The performance standards in Rule INF-R1 are met; 2. These are located in a GRUZ-General Rural Zone or LINZ - Industrial Zone; and Poles do not exceed a height of 25m; Towers do not exceed a height of 15m. 3. These are the extension of existing overhead lines that involve no more than five poles in areas where services are already above ground provided that written approval from landowners within a 22m radius of new poles has been obtained and provided to Council 10 working days prior to activities commencing.</p> <p>Consequential amendment to the Restricted Discretionary Activity Rules to include installation of above ground activities that do not comply with the performance standard.</p>
Westpower Limited (S547)	S547.095	Energy	Energy Rules	Support	The section of "notes" is supported.	Retain "Notes" section.
Westpower Limited (S547)	S547.096	Energy	Energy Rules	Amend	Plan complexity and number of rules which may apply to energy activities..	Consider reformatting the chapter to include all relevant rules from throughout

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						the plan to enable a more efficient assessment of compliance, and ease of use and implementation of the plan.
Chris & Jan Coll (S558)	S558.450	Energy	Energy Rules	Oppose	We support Buller Electricity Ltd's submission regarding these rules.	Amend as sought by Buller Electricity Ltd.
Chris J Coll Surveying Limited (S566)	S566.450	Energy	Energy Rules	Oppose	We support Buller Electricity Ltd's submission regarding these rules.	Amend as sought by Buller Electricity Ltd.
William McLaughlin (S567)	S567.050	Energy	Energy Rules	Oppose	We support Buller Electricity Ltd's submission regarding these rules.	Amend as sought by Buller Electricity Ltd.
Laura Coll McLaughlin (S574)	S574.450	Energy	Energy Rules	Oppose	We support Buller Electricity Ltd's submission regarding these rules.	Amend as sought by Buller Electricity Ltd.
Buller Electricity Limited (S451)	S451.035	Energy	Permitted Activities	Amend	It is unclear whether underground electricity transmission lines are a permitted activity in the proposed TTPP.	Make it clear that underground electricity transmission lines are a permitted activity
Westpower Limited (S547)	S547.097	Energy	Permitted Activities	Amend	Rule ENG-R4 is silent as to when new lines are required to be placed underground or may be above ground.	Add a new Rule: Distribution Lines (including connection to consumers) Activity Status Permitted Where:1. New lines are underground where located in RESZ - Residential, or CMUZCommercial and Mixed Use Zones; or2. Existing above ground lines are located within the zones identified in 1. and are extended by no more than 5 poles; or 3. are above ground within SASM sites within the zones identified in 1. for the purpose of maintaining the values of the SASM site, and3. poles for above ground lines do not exceed a height of 25m.Activity status where compliance is not achieved: Restricted Discretionary.
Westpower Limited (S547)	S547.098	Energy	Permitted Activities	Amend	To provide for large scale generation in the Industrial zone.	Add new permitted activity Rule: The construction, operation, maintenance and upgrade of community and large scale renewable energy activities

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						excluding wind Activity Status Permitted Where:1. Performance standards in Rule ENG-R1 are complied with;2. The activity is located within the Industrial zone; and3. all buildings and generating structures comply with building coverage, height and setback requirements for the zone; and4. buildings and generating structures are screened by fencing and/or landscaping (including earth bunds) along any road frontage and the side boundary of a site that adjoins a RESZ- Residential, SETZ-Settlement, OSZOpen Space or MUZ-Mixed Use zone.Activity status where compliance is not achieved: Discretionary.
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.051	Energy	ENG - R1	Support	We support this rule.	Retain rule.
Transpower New Zealand Limited (S299)	S299.043	Energy	ENG - R1	Support	Transpower supports the provision of a permitted activity, and the default activity status provided.	Retain the rule
Manawa Energy Limited (Manawa Energy) (S438)	S438.048	Energy	ENG - R1	Support	Manawa supports the retention of this rule in its current form.	Retain ENG - R1 as notified.
Buller Electricity Limited (S451)	S451.036	Energy	ENG - R1	Support in part	Rule ENG - R1 (Energy Permitted Activity Performance Standards) is supported in part, however an amendment is sought in order to accommodate any future updates of the referenced documents while also seeking to be consistent with Policy 9 of the NESET. This rule would then also relate to the above proposed additional Policy ENG - 10.	Amend as follows: 1. <i>Electric and Magnetic fields - An activity generating electric or magnetic fields does not exceed the maximum exposure level listed in the International Commission on Non-ionizing Radiation Protection Guidelines for limiting exposure to time-varying electric and magnetic fields (1Hz - 100 kHz) (Health Physics (6):818-836; 2010) or revisions thereof</i> , and the recommendations from the

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						World Health Organisation's monograph Environmental Health Criteria 238, June 2007 or revisions thereof and any applicable New Zealand standards or National Environmental Standards.
Frank and Jo Dooley (S478)	S478.093	Energy	ENG - R1	Support in part	Rule ENG - R1 (Energy Permitted Activity Performance Standards) is supported in part, however an amendment is sought in order to accommodate any future updates of the referenced documents while also seeking to be consistent with Policy 9 of the NESET. This rule would then also relate to the above proposed additional Policy ENG - 10.	Amend as follows: <i>1. Electric and Magnetic fields - An activity generating electric or magnetic fields does not exceed the maximum exposure level listed in the International Commission on Non-ionizing Radiation Protection Guidelines for limiting exposure to time-varying electric and magnetic fields (1Hz - 100 kHz) (Health Physics (6):818-836; 2010)</i> or revisions thereof , and the recommendations from the World Health Organisation's monograph Environmental Health Criteria 238, June 2007 or revisions thereof and any applicable New Zealand standards or National Environmental Standards.
Buller District Council (S538)	S538.019	Energy	ENG - R1	Support in part	Rule 1 is supported but the reference in the heading to 'permitted' is not needed as the rule sits under a general heading of Permitted Activities.	Amend the heading of Rule 1 as follows: Energy-Permitted-Activity Performance Standards
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.052	Energy	ENG - R2	Support	We support this rule.	Retain rule.
Transpower New Zealand Limited (S299)	S299.044	Energy	ENG - R2	Support	Transpower is neutral on this rule on the proviso that the definition of substations (zone) is amended to make it clear this does not apply to its substations. Transpower's existing substations are designated and Transpower accepts it appropriate that any new substations	Amend definition of substation (zone) as above. No changes required to the rule.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					require resource consent as a restricted discretionary activity under ENG-R11.	
Buller Electricity Limited (S451)	S451.037	Energy	ENG - R2	Support	The proposed Rule ENG - R2 '(Substations (Zone))' is supported in that it enables the operation, maintenance, repair and upgrade of existing substations within existing switchyards or buildings, and also new substations in an industrial zone.	Retain as notified.
Frank and Jo Dooley (S478)	S478.094	Energy	ENG - R2	Support	The proposed Rule ENG - R2 '(Substations (Zone))' is supported in that it enables the operation, maintenance, repair and upgrade of existing substations within existing switchyards or buildings, and also new substations in an industrial zone.	Retain as notified.
Buller District Council (S538)	S538.020	Energy	ENG - R2	Support	Rules 2 and 3 are supported	Retain as notified.
Westpower Limited (S547)	S547.099	Energy	ENG - R2	Amend	Some amendments are required to adequately provide for those activities in other zones.	Amend 2. This is the operation, maintenance repair and upgrade of an existing substation (zone) where any new works and/or upgrades are undertaken within existing switchyards or the existing building envelope , in any zone;
Westpower Limited (S547)	S547.100	Energy	ENG - R2	Amend	upgrading should be removed from item 3. As it is already provided for.	Amend 3. This is a new substation (zone) or upgrade to an existing substation (zone):
Westpower Limited (S547)	S547.101	Energy	ENG - R2	Amend	Majority of substations are located within the Rural Zone,	Amend 3. ... i. Located in an Industrial or Rural zone; and ii. Screening is provided between any new substation and a road and any residential building located outside the Industrial zone ...

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Westpower Limited (S547)	S547.102	Energy	ENG - R2	Amend	Clarification of requirements for screening in item 3.ii. are required.	3. This is a new substation (zone) : i. Located in an Industrial or Rural zone; and ii. Screening is provided between any new substation and a road and any existing residential building by fencing and/or landscaping (including earth bunds).
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.053	Energy	ENG - R3	Support	We support this rule.	Retain rule.
Buller Electricity Limited (S451)	S451.038	Energy	ENG - R3	Support		Retain as notified
Frank and Jo Dooley (S478)	S478.095	Energy	ENG - R3	Support		Retain as notified
Buller District Council (S538)	S538.021	Energy	ENG - R3	Support	Rules 2 and 3 are supported	Retain as notified.
Westpower Limited (S547)	S547.103	Energy	ENG - R3	Support	This rule provides for operation of the network to supply consumers.	Retain
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.119	Energy	ENG - R3	Oppose in part	In the case of a new substation there needs to be standards to limit vegetation clearance and protect any significant values identified in accordance with the criteria in the WCRPS.	Include requirement to meet the permitted vegetation clearance standards in the ECO chapter.
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.054	Energy	ENG - R4	Support	We support this rule.	Retain rule.
Transpower New Zealand Limited (S299)	S299.045	Energy	ENG - R4	Amend	Transpower is neutral on the rule as it is not directly applicable to Transpower given the NESETA. The reference in the rule to the NESETA is specifically supported. However, Transpower does query the reference in the rule to 'new distribution and transmission lines' given	Amend the rule to clarify if it applies to new transmission lines

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					the permitted activity status and that new standards relate to new lines.	
Buller Electricity Limited (S451)	S451.039	Energy	ENG - R4	Support in part	It is considered that the reference to poles in Clause 4 of this rule needs to be amended to read: "pole structures at its widest point". The addition of the word "structures" makes more practical sense. It is also considered that clause 5 of this rule also needs to also provide for additional poles and assemblies as the current rules (PC145) provide for up to 5 poles to be added as a permitted activity.	Amend as follows: amend the reference to poles in Clause 4 to read: "pole structures at its widest point". Amend Clause 5 to provide for up to 5 additional poles and assemblies.
Frank and Jo Dooley (S478)	S478.096	Energy	ENG - R4	Support in part	It is considered that the reference to poles in Clause 4 of this rule needs to be amended to read: "pole structures at its widest point". The addition of the word "structures" makes more practical sense. It is also considered that clause 5 of this rule also needs to also provide for additional poles and assemblies as the current rules (PC145) provide for up to 5 poles to be added as a permitted activity.	Amend as follows: amend the reference to poles in Clause 4 to read: "pole structures at its widest point". Amend Clause 5 to provide for up to 5 additional poles and assemblies.
Buller District Council (S538)	S538.022	Energy	ENG - R4	Support in part	Rule 4 is generally supported but the rule heading is long and could be simplified for ease of reference. It is suggested that rather than listing the various energy associated activities in the heading, reference is made to 'energy activities' generally as this is defined in the Plan. Council also seeks that 'above ground' is added to the heading to clarify that the rule is restricted in scope to these activities and that a new rule is included to enable operation and maintenance of 'below ground' energy activities, as per below.	Amend Rule 4 as follows: Operating existing transmission and distribution lines, new distribution and transmission lines, maintaining, minor upgrading, strengthening, upgrading and replacing support structures and foundations not managed by the National Environmental Standard for Electricity Transmission Activities. Operation, Maintenance, Repairs and Removal of Existing Above Ground Energy Activities.
Westpower Limited (S547)	S547.104	Energy	ENG - R4	Amend	To ensure there is no ambiguity at the time of administration/implementation.	Amend rule heading to clearly define permitted activities:

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<ul style="list-style-type: none"> Operating existing transmission and distribution lines, including connections to consumers. New distribution and transmission lines, including connections to consumers. Maintaining, repairing, minor upgrading, strengthening, upgrading and replacing of transmission and distribution lines, including connection to consumers and support structures and foundations not managed by the National Environmental Standard for Electricity Transmission Activities.
Westpower Limited (S547)	S547.105	Energy	ENG - R4	Amend	To enable the permitted activities provided for to be achieved in a safe and secure manner.	Amend: 4. The diameter or width of ... at its widest point and; where a single pole is replaced with a pi pole, the width of the pi pole structure must not exceed three times that of the replaced pole 5 metres at its widest point and 5. Additional conductors or lines ... of the original. Where additional conductors or lines are installed any intermediate poles required to achieve electrical safety standards can also be installed.
Westpower Limited (S547)	S547.106	Energy	ENG - R4	Amend	Based on the definition of minor upgrading submitted to remove any duplication.	Review items 2.-9. of the rule and delete duplication with matters provided for in the definition of minor upgrading submitted above.
Royal Forest and Bird Protection Society of New	S560.120	Energy	ENG - R4	Amend	Define minor upgrading, upgrading and substantial updating..	Include requirement to meet the permitted vegetation clearance standards in the ECO chapter

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Zealand Inc. (Forest & Bird) (S560)						
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.461	Energy	ENG - R4	Amend	Standard 2 includes buildings and minor utilities structures which appear to be beyond the scope of the rule as set out in the heading for support structures and foundations.	Define minor upgrading, upgrading and substantial updating.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.462	Energy	ENG - R4	Amend	Standard 2 includes buildings and minor utilities structures which appear to be beyond the scope of the rule as set out in the heading for support structures and foundations.	Delete building and minor utility structure from the rule.
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.055	Energy	ENG - R5	Support	We support this rule.	Retain rule.
Manawa Energy Limited (Manawa Energy) (S438)	S438.049	Energy	ENG - R5	Support in part	<p>Manawa supports this rule in part as it is essential that there be a permitted activity rule providing for the ongoing operation of renewable electricity generation activities and for the establishment of new smaller scale facilities. However, Manawa considers that:</p> <ul style="list-style-type: none"> the terminology within the rule should be altered to apply to small and community scale distributed electricity generation use rather than simply small-scale activities (as previously discussed in the definitions section). provision should be made for the operation, maintenance, repair and minor upgrade of existing renewable electricity generation activities as a permitted activities. At present the rules are entirely silent on the ongoing use of existing activities and there is no obvious activity status for this. At worst, this could mean that maintenance on large 	<p>Replace ENG - R5 with the following: ENG - R5 The construction, operation, maintenance, repair and upgrade of renewable electricity structures for small and community scale electricity generation, and The operation, maintenance, repair and minor upgrade of existing renewable electricity generation activities. Activity Status Permitted Where:</p> <p>1. Performance standards in Rule ENG - R1 are complied with; Solar panels do not exceed the permitted height in the relevant zone by more than 0.25m vertically; Wind turbines do not exceed 8m in height; Wind turbines comply with NZS 6808:2010 Acoustics - Wind Farm Noise; Structures, buildings or impermeable surface for hydroelectricity generation must not exceed a footprint of 100m² or an increase in area from existing buildings/structures and surfacing of</p>

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					<p>hydroelectricity structures is a discretionary activity. Clearly this is not appropriate. Amending this rule to explicitly provide for existing activities would ensure consistency with the provisions of the NPS - REG and is considered essential for the ongoing operation of these facilities, the nature of associated hazards within the West Coast and the associated necessity to ensure resilience of such (as it reflected in the strategic direction provisions of the pTTPP).</p> <ul style="list-style-type: none"> • wind turbines do not need to be specified as 'small scale' as the performance standards for this rule limit them in height and scale. If a maximum number of turbines or a maximum scale of facility is considered necessary to ensure that this rule only allows smaller scale facilities to be permitted, then an additional performance standard can be added to limit the generation from such facilities • it is inappropriate, inequitable and unjustified to require activities not meeting the standard 4 (which applies to small scale wind turbines and compliance with NZS 6808: 2010 Acoustics - Wind Farm Noise) to be accorded non-complying activity status. The common activity status used elsewhere in the country for this situation is discretionary and that should be applied in this situation also. Having a non-complying activity status would not provide for the national direction seeking to enable renewable electricity generation activities. • that the size limits stipulated for land 	<p>more than 10%; and Any building or structure must not be located within an existing esplanade reserve or strip. The maximum generation capacity for new small and community scale generation activities is 500kW. Activity status where compliance not achieved: Restricted Discretionary where performance standards 2, 3, 5, 6 and 7 are not complied with. Discretionary where performance standard 4 is not complied with. Non-complying where performance standard 1 is not complied with.</p>

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					based structures, building or impermeable surface for hydroelectricity generation in clause 5 are too small to cover most existing schemes and will generally only apply to domestic scale new activities. This also limits the ability to undertake meaningful works to existing structures. Amended wording for this performance standard is proposed.	
Buller District Council (S538)	S538.025	Energy	ENG - R5	Support	Rule 5 is supported	Retain as notified.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.121	Energy	ENG - R5	Support in part	There are no standards to address effects on biodiversity.	Include requirement to meet the permitted vegetation clearance standards in the ECO chapter.
Westland Milk Products (S63)	S63.019	Energy	ENG - R6	Amend	The property at 19/27 Town Belt East (Lot 3 DP 2695) is owned by the Submitter and, , are subject to the Electricity Transmission Distribution Yard and Significant Electricity Distribution Line layers (refer map in original submission). ENG - R6 controls activities located in and around Significant Electricity Distribution Lines. Any new industrial buildings within the layer would be a non-complying activity under this rule. The rule is considered overly restrictive and does not provide for activities that are compatible with electricity distribution activities.	The following amendment is sought to provide for a limited range of industrial buildings: Activity Status Permitted Where: ...3. The following other activities are able to occur under the conductors where these are Permitted within the relevant zone and overlay: ...v. Non-habitable industrial buildings;
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.056	Energy	ENG - R6	Support	We support this rule.	Retain rule.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Buller Electricity Limited (S451)	S451.002	Energy	ENG - R6	Amend	There is a significant risk to those using the TTPP in that the provisions contained in the Energy chapter will be missed. This risk is caused by there not being any reference to these rules on the planning maps nor in the Zone Chapters.	Include this rule within the zone provisions where significant distribution lines exist.
Frank and Jo Dooley (S478)	S478.059	Energy	ENG - R6	Amend	There is a significant risk to those using the TTPP in that the provisions contained in the Energy chapter will be missed. This risk is caused by there not being any reference to these rules on the planning maps nor in the Zone Chapters.	Include this rule within the zone provisions where significant distribution lines exist.
Horticulture New Zealand (S486)	S486.019	Energy	ENG - R6	Support in part	HortNZ seeks to ensure that horticultural activities can occur in and around SEDL's and considers that NZECP34:2001 provides the basis for provisions around significant electricity distribution lines, which are any lines of 33kv or greater. The provisions in ENG-R6 set an arbitrary setback distance of 12 metres which does not align with NZECP34:2001. The provisions in the plan should align with NZECP34 which vary according to voltage and span. This would enable horticultural structures where they meet the NZECP requirements.	Amend ENG-R6 by deleting 4) and relying on clause 5) which applies the distances in NZECP34:2001.
Federated Farmers of New Zealand (S524)	S524.037	Energy	ENG - R6	Support in part	NZECP34:2001 provides the basis for provisions around significant electricity distribution lines which are any lines of 33kv or greater. The provisions in the plan should align with NZECP34 which vary according to voltage and span. The provisions in ENG-R6 set an arbitrary setback distance of 12metres which does not align with NZECP34:2001.	Amend ENG-R6 by deleting 4) and relying on clause 5) which applies the distances in NZECP34:2001.
Buller District Council (S538)	S538.026	Energy	ENG - R6	Oppose in part	While clause 3 lists activities which are able to occur under the transmission lines, there is no provision for earthworks	Amend Rule 6 and include an additional clause as follows:

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					associated with agricultural activities. This is considered an important omission given the District's electricity transmission network extends over large areas of rural land where agricultural activities such as cultivation are being undertaken beneath the network. Provided earthworks are undertaken so that there will be no reduction of ground clearance distances, Council considers that agricultural activities will not pose a threat to the integrity of the network and provision should be made for this within the rule.	3. The following other activities are able to occur under the conductors where these are Permitted within the relevant zone and overlay: (v) Agricultural and horticultural activities provided that any earthworks do not result in a reduction of existing ground clearance distances from overhead lines.
Westpower Limited (S547)	S547.107	Energy	ENG - R6	Amend	(1) The intent of the rule is supported with some minor amendments to ensure that the outcomes sought are achieved by the rule and correct reference to line type. (2) This rule relates to activities in an around significant electricity distribution lines and accordingly should be included in all zone provisions to ensure it is not overlooked when undertaking activities in those zones.	(1) Amend 3.iv., "iv. Structures used for ... buildings for sensitive activities; and " (2) Amend 5. to refer to distribution lines rather than transmission lines, "5. Structures and activities located near distribution lines must comply with the safe distance ...". (2) Incorporate rule ENG-R6 into the rules in all zones, including the proposed rule for non-complying activities where compliance is not achieved as submitted below.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.122	Energy	ENG - R6	Amend	It would be clearer if the rule heading referred to the national gird yard and subdivision corridor, consistent with ENG-P9 rather than the Lines.	Limit to 'energy activities' as sought above in Interpretation section. Include requirement to meet the permitted vegetation clearance standards in the ECO chapter.
Westland Milk Products (S63)	S63.020	Energy	ENG - R7	Amend	The property at 19/27 Town Belt East (Lot 3 DP 2695) is owned by the Submitter and, as shown on the Proposed TTPP Planning Maps, are	The following amendment is sought to provide for a limited range of industrial buildings: Activity Status Permitted Where:

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					subject to the Electricity Transmission Distribution Yard. Rule ENG - R7 controls activities in the Electricity Transmission Distribution Yard. Any new industrial buildings within the layer would be a non-complying activity under this rule. The rule is considered overly restrictive and does not provide for activities that are compatible with electricity distribution activities.	1. These are the following activities where they are also Permitted within the relevant zone and overlay: ...iv. Non - habitable industrial , farm or horticultural buildings or structures excluding commercial greenhouses, protective canopies, wintering barns, produce packing facilities, dairy and milking sheds;
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.057	Energy	ENG - R7	Support	We support this rule.	Retain rule.
Transpower New Zealand Limited (S299)	S299.046	Energy	ENG - R7	Amend	Transpower supports the inclusion and wording of this rule as it is consistent with the direction provided in the NPSET. The NPSET directs that sensitive activities should not be located within the National Grid Yard and for the avoidance of doubt, Transpower requests an amendment to reflect this.	Amend the rule as follows: ENG - R7 - Buildings, Structures and Activities within the National Grid Yard Activity Status Permitted Where: These are the following activities where they are also Permitted within the relevant zone and overlay: Fences less than 2.5m high; Alterations and additions to existing buildings and structures used for sensitive activities that do not involve an increase in the building or structure height or footprint; Infrastructure undertaken by a Network Utility Operator within a transport corridor or any part of electricity infrastructure that connects the National Grid; Non - habitable farm or horticultural buildings or structures excluding commercial greenhouses, protective canopies, wintering barns, produce packing facilities, dairy and milking sheds; The activity is not a sensitive activity. An accessory building or structure associated with an existing residential activity that is less than 10m2 and 2.5m in height; All buildings,

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						structures and activities permitted by 1. above must have: A minimum vertical clearance of at least 10m below the lowest point of a conductor - or meet the electrical distances required by NZECP 34: 2001 under all transmission line and building operation conditions; Not result in the loss of vehicle access to a National Grid support structure; Be located at least 12 metres from the outer visible edge of a foundation of a National Grid transmission support structure except where it is: Infrastructure undertaken by a network utility operator, or any part of electricity infrastructure that connects the National Grid; A fence not exceeding 2.5m in height that is located at least: 6m from the outer visible edge of a foundation of a National Grid transmission line tower; or 5m from the outer visible edge of a foundation of a National Grid transmission line pole; An artificial crop protection structure or crop support structure not exceeding 2.5m in height and located at least 8m from a National Grid transmission line pole that: Is removable or temporary to allow a clear working space of 12m from the pole for maintenance; and Allows all weather access to the pole and sufficient area for maintenance equipment including a crane; or A building or structure where Transpower has given written approval in accordance with clause 2.4.1 of NZECP34: 2001
Buller Electricity Limited (S451)	S451.003	Energy	ENG - R7	Amend	There is a significant risk to those using the TTPP in that the provisions contained in the Energy chapter will be missed.	Include this rule within the zone provisions where significant distribution lines exist.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Frank and Jo Dooley (S478)	S478.060	Energy	ENG - R7	Amend	There is a significant risk to those using the TTPP in that the provisions contained in the Energy chapter will be missed.	Include this rule within the zone provisions where significant distribution lines exist.
Horticulture New Zealand (S486)	S486.020	Energy	ENG - R7	Support in part	The rule seeks that certain activities are limited in the National Grid Yard including produce packing facilities, which is not defined and could be quite small scale. It is considered that if a non-habitable horticultural building is used for sorting and packing produce complies with NZECP34:2001 then it should not be a non-complying activity. Provision for artificial crop protection structures is supported.	Amend ENG-R7 (1) iv) by deleting 'produce packing facilities'. Retain ENG-R7 2) iii) c) and d)
Buller District Council (S538)	S538.027	Energy	ENG - R7	Support	Rule 7 is supported	Retain Rule 7 as notified.
Martin & Lisa Kennedy (S545)	S545.011	Energy	ENG - R7	Amend	While we understand the need for rules we do not understand why the existing rules have not just been reinstated.	Replace the rules with those developed in the operative Grey District Plan with regard to National Grid matters.
Nick Pupich Sandy Jefferies (S546)	S546.011	Energy	ENG - R7	Amend	While we understand the need for rules we do not understand why the existing rules have not just been reinstated.	Replace the rules with those developed in the operative Grey District Plan with regard to National Grid matters
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.086	Energy	ENG - R7	Amend	Typo mistake	(2)(iii)(b) height spelt incorrectly.
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.058	Energy	ENG - R8	Support	We support this rule.	Retain rule.
Buller Electricity Limited (S451)	S451.040	Energy	ENG - R8	Support		Retain as notified.
Frank and Jo Dooley (S478)	S478.097	Energy	ENG - R8	Support		Retain as notified.
Buller District Council (S538)	S538.028	Energy	ENG - R8	Support in part	Council notes that for Rule 8 there is no area restriction for electricity cabinets and	Amend Rule 8 as follows: 2. The cabinet has a maximum height

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					suggests that an area limit of 10m ² would be appropriate.	above ground level of 2m; and 3. The cabinet has a maximum are of 10m².
Westpower Limited (S547)	S547.109	Energy	ENG - R8	Support	Provides for electricity cabinets..	Retain
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.059	Energy	ENG - R9	Support	We support this rule.	Retain rule.
Transpower New Zealand Limited (S299)	S299.047	Energy	ENG - R9	Amend	Notwithstanding the NESETA regulates temporary activities associated with existing National Grid assets, Transpower supports this rule as it provides a clear and permissive pathway for responding to an emergency. A timeframe for removal of structures from the site would provide greater clarity, and Transpower requests that six months is provided. Installation of temporary structures and networks may be complex and sufficient time would be required for their safe removal.	Amend the rule as follows: ENG - R9 - Temporary Energy Activities Activity Status Permitted Where: The temporary energy activity is for up to a period of 24 months following a national, regional or local state of emergency declaration; All performance standards in Rule ENG - R1 are complied with; and Any temporary structures are removed from the site and the site is rehabilitated within six months of the when operation ceasinges and the sites is rehabilitated
Manawa Energy Limited (Manawa Energy) (S438)	S438.050	Energy	ENG - R9	Support	Manawa supports the inclusion of rules in the pTTPP enabling temporary activities required following the declaration of a national, regional or local state of emergency declaration to be undertaken as a permitted activity. These activities are vital to the functioning of regionally significant infrastructure, such as Renewable Electricity Generation activities, and the ability for the West Coast to recover from such events as quickly as possible without incurring delays and costs associated with obtaining any required resource consents.	Amend ENG - R9 as follows: ENG - R9 Temporary Energy Electricity Generation Activities Where: 1. The temporary energy electricity generation activity is for up to a period of 24 months following a national, regional or local state of emergency declaration; 2. All performance standards in Rule ENG - R1 are complied with; and 3. Any temporary structures are removed from the site when operation ceases and the site is rehabilitated.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					However minor consequential amendments have been suggested.	
Westpower Limited (S547)	S547.110	Energy	ENG - R9	Support	Provides for emergency situations and the ongoing supply of energy.	Retain
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.123	Energy	ENG - R9	Amend		Limit to 'energy activities' as sought by submission in Interpretation section.
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.060	Energy	ENG - R10	Support	We support this rule.	Retain rule.
Manawa Energy Limited (Manawa Energy) (S438)	S438.051	Energy	ENG - R10	Support	<p>Manawa supports the inclusion of a specific rule for environmental monitoring and extreme weather event monitoring facilities, and meteorological facilities as permitted activities. These facilities also play a role in the operation of Renewable Electricity Generation activities, provide important information and are often required to ensure compliance with conditions of resource consent.</p> <p>However, Manawa considers that: the height and structure footprint provided for as a permitted activity under this rule is insufficient to be meaningful in providing for investigations into meteorological conditions. Slimline masts and towers should be provided for to a greater height. the activity status for larger monitoring structures should not be non-complying as this would not be consistent with other structures in generally rural areas and would not give effect to the NPS-REG which seeks to enable such activities.</p>	<p>Amend ENG - R10 as follows:</p> <ol style="list-style-type: none"> 1. All performance standards in Rule INF - R1 are complied with; and 2. Monitoring equipment is not more than 4m in height and 25m² in area. equipment is limited to: <ol style="list-style-type: none"> a. Masts and towers with a maximum footprint of 4m² and a maximum height of 10m, or b. Other structures up to 4m in height and 25m² in area. <p>Activity status where compliance not achieved: Non-complying Restricted Discretionary where performance standard 2 is not complied with. Non-complying where performance standard 1 is not complied with.</p>

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Buller District Council (S538)	S538.029	Energy	ENG - R10	Oppose	Environmental monitoring and meteorological facilities are expected to be small scale structures and Council does not see the necessity for imposing performance standards. In any case, there is provision for environmental and meteorological facilities within the Infrastructure Chapter therefore this rule is not considered necessary.	Delete Rule 10.
Westpower Limited (S547)	S547.111	Energy	ENG - R10	Support	Provides for monitoring and measurement facilities.	Retain
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.124	Energy	ENG - R10	Amend		Include requirement to meet the permitted vegetation clearance standards in the ECO chapter.
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.061	Energy	ENG - R11	Support	We support this rule.	Retain rule.
Transpower New Zealand Limited (S299)	S299.048	Energy	ENG - R11	Amend	It appears that the intent is that any of Transpower's substations that are not designated would be captured by this rule. Clarification to the definition for 'substation (zone)' are sought to confirm this is the case and amendment to the rule to also apply to other substations not otherwise provided for. Transpower supports this rule and seeks an amendment to (g) to refer to Schedules 1-8, rather than overlay chapters. Transpower is seeking that all provisions relating to energy be captured in the Energy Chapter, so reference to overlay chapters would not be required.	Amend the rule as follows: ENG - R11 - Substations not meeting Permitted Activity standards, or not otherwise provided for
Buller District Council (S538)	S538.030	Energy	ENG - R11	Support	Rules 11 is supported	Retain as notified.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Westpower Limited (S547)	S547.112	Energy	ENG - R11	Amend	amendments are required in order for the rule to provide for functional matters.	Amend b. Locational, technical, functional and operational constraints;
Westpower Limited (S547)	S547.113	Energy	ENG - R11	Amend	It appears to relate to the potential for discharges which will be regulated by regional plan.	Delete item e.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.125	Energy	ENG - R11	Amend	The matters of discretion are inappropriate to provide for biodiversity and other natural values.	Amend the matter of discretion: The degree to which the proposed activity will cause significant adverse effects on overlay Chapter Matters <ul style="list-style-type: none"> • Whether the activity will cause any adverse effects on Overlay Chapter matters, and the requirement to manage those effects in accordance with the relevant Overlay provisions. • Whether the activity will cause any adverse effects on areas meeting the significance criteria in Appendix 1 WCRPS, and the requirement to manage those effects in accordance with the relevant Overlay provisions. • The requirement to avoid and otherwise manage effects on biodiversity, natural character, and landscape in the coastal environment in accordance with policy 11, 13 and 15 NZCPS.
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.087	Energy	ENG - R11	Amend	The proposed plan does not adequately alert plan users that other archaeological sites	Include the following matter for discretion to the rule: g. The degree to which the proposed activity will cause significant adverse effects on Overlay Chapter matters and

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						sites listed in Appendix 10 .
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.062	Energy	ENG - R12	Support	We support this rule.	Retain rule.
Transpower New Zealand Limited (S299)	S299.049	Energy	ENG - R12	Amend	Transpower supports this rule as it applies to new electricity transmission lines. However, on the basis activities relating to existing lines are covered by the NESETA, Transpower seeks deletion of reference to transmission in context of operating existing lines. If Transmission applies to activities other than the National Grid, this should be made clear within the rule such that the rule not apply to National Grid Transmission lines.	Amend the rule as follows: ENG - R12 - Operating existing transmission and distribution lines, new distribution and transmission lines, maintaining, minor upgrading, strengthening, upgrading and replacing support structures and foundations not meeting Permitted Activity standards not meeting Permitted Activity Status Restricted Discretionary
Buller District Council (S538)	S538.031	Energy	ENG - R12	Support in part	As a consequence of the amendments sought above, a change to the heading of Rule 12 is sought.	Operating existing transmission and distribution lines, new distribution and transmission lines, maintaining, minor upgrading, strengthening, upgrading and replacing support structures and foundations not meeting Permitted Activity Standards Operation, Maintenance, Repairs or Removal of Existing Above Ground Energy Activities not meeting Permitted Activity Standards Provision also needs to be made for installation of above ground transmission lines that do not comply with the permitted performance standards to be treated as discretionary activities.
Westpower Limited (S547)	S547.114	Energy	ENG - R12	Amend	To refer to the relevant rules to which this activity category relates.	Delete existing heading and amend rule heading: ENG-R12 Activities not meeting permitted activity standards of

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						ENG-R4 and ENG-R4A (Proposed new Rule)
Westpower Limited (S547)	S547.115	Energy	ENG - R12	Amend	Refer to the proposed new rule ENG-4A for distribution lines, including customer connections.	Amend item a. Degree of non-compliance with Rule ENG-R4 and ENG-R4A .
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.126	Energy	ENG - R12	Amend	The matters of discretion are inappropriate to provide for biodiversity and other natural values.	Amend the matter of discretion in each rule: The degree to which the proposed activity will cause significant adverse effects on overlay Chapter Matters <ul style="list-style-type: none"> • Whether the activity will cause any adverse effects on Overlay Chapter matters, and the requirement to manage those effects in accordance with the relevant Overlay provisions. • Whether the activity will cause any adverse effects on areas meeting the significance criteria in Appendix 1 WCRPS, and the requirement to manage those effects in accordance with the relevant Overlay provisions. • The requirement to avoid and otherwise manage effects on biodiversity, natural character, and landscape in the coastal environment in accordance with policy 11, 13 and 15 NZCPS.
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.088	Energy	ENG - R12	Amend	The proposed plan does not adequately alert plan users that other archaeological sites	Include the following matter for discretion to the rule: d. The degree to which the proposed activity will cause significant adverse effects on Overlay Chapter matters and

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						sites listed in Appendix 10 .
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.063	Energy	ENG - R13	Support	We support this rule.	Retain rule.
Buller District Council (S538)	S538.032	Energy	ENG - R13	Support	Rules 13 to 20 are supported.	Retain as notified.
Westpower Limited (S547)	S547.116	Energy	ENG - R13	Amend	To be amended to include reference to "functional" matters as defined in the plan.	Amend item a. Locational, technical, functional and operational constraints.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.127	Energy	ENG - R13	Amend	The matters of discretion are inappropriate to provide for biodiversity and other natural values.	<p>Amend the matter of discretion in each rule:The degree to which the proposed activity will cause significant adverse effects on overlay Chapter Matters</p> <ul style="list-style-type: none"> • Whether the activity will cause any adverse effects on Overlay Chapter matters, and the requirement to manage those effects in accordance with the relevant Overlay provisions. • Whether the activity will cause any adverse effects on areas meeting the significance criteria in Appendix 1 WCRPS, and the requirement to manage those effects in accordance with the relevant Overlay provisions. • The requirement to avoid and otherwise manage effects on biodiversity, natural character, and landscape in the coastal environment in accordance with policy 11, 13 and 15 NZCPS.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.089	Energy	ENG - R13	Amend	The proposed plan does not adequately alert plan users that other archaeological sites	Include the following matter for discretion to the rule: b. The degree to which the proposed activity will cause significant adverse effects on Overlay Chapter matters and sites listed in Appendix 10 .
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.064	Energy	ENG - R14	Support	We support this rule.	Retain rule.
Manawa Energy Limited (Manawa Energy) (S438)	S438.052	Energy	ENG - R14	Oppose	<p>Manawa opposes this rule and seeks that it be deleted. The changes sought by Manawa include providing more clearly for activities that are permitted under rules ENG - R5 and ENG - R10, and further amendment to ENG - R15 that provides for the restricted discretionary status of activities not meeting those permitted rules.</p> <p>Other rules, such as ENG - R9, are considered to sufficiently address the status of temporary energy activities not meeting this standard.</p> <p>With the changes sought to definitions (to not separately define small, community and large activities) and the permitted activity status rule (R5) dealing with the scale of activities regardless of definition, there is no necessity for this rule to address 'community scale' activities.</p> <p>This rule also deals with 'renewable energy investigation activities' which are not defined in the plan. The definition of "energy activity" includes energy investigation and it is unclear what the council may consider under this term. Usually within a district plan energy</p>	Delete ENG - R14

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					investigation would most commonly be meteorological measurements (noting other investigation would be covered by regional rules). This type of activity is covered by ENG - R10 so would not be lost if rule R14 is deleted. Similarly if activities under rule R9 dealing with temporary energy activities need to be escalated, then that can be to the restricted discretionary activity rule R15. For these reasons it considers that this rule is not required and seeks the deletion of such.	
Buller District Council (S538)	S538.033	Energy	ENG - R14	Support	Rules 13 to 20 are supported.	Retain as notified.
Westpower Limited (S547)	S547.117	Energy	ENG - R14	Amend	For consistency between plan provisions.	Amend item d. Locational, technical, functional and operational constraints;
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.128	Energy	ENG - R14	Amend	The matters of discretion are inappropriate to provide for biodiversity and other natural values.	Amend the matter of discretion in each rule: The degree to which the proposed activity will cause significant adverse effects on overlay Chapter Matters <ul style="list-style-type: none"> • Whether the activity will cause any adverse effects on Overlay Chapter matters, and the requirement to manage those effects in accordance with the relevant Overlay provisions. • Whether the activity will cause any adverse effects on areas meeting the significance criteria in Appendix 1 WCRPS, and the requirement to manage those effects in accordance with the relevant Overlay provisions. • The requirement to avoid and otherwise manage effects on

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						biodiversity, natural character, and landscape in the coastal environment in accordance with policy 11, 13 and 15 NZCPS.
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.090	Energy	ENG - R14	Amend	The proposed plan does not adequately alert plan users that other archaeological sites	Include the following matter for discretion to the rule: f. The degree to which the proposed activity will cause significant adverse effects on Overlay Chapter matters and sites listed in Appendix 10 .
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.065	Energy	ENG - R15	Support	We support this rule.	Retain rule.
Manawa Energy Limited (Manawa Energy) (S438)	S438.053	Energy	ENG - R15	Oppose	Manawa strongly opposes ENG - R15 as currently drafted. It does not consider that this rule gives sufficient effect to the provisions of the NPS - REG as it makes most renewable electricity generation projects straight into discretionary activity status. This is not appropriate when it is national direction to provide for significant increases in renewable electricity generation. Further, because there is no rule that provides for the maintenance, repair, operation and minor upgrading of existing renewable electricity generation activities (ie those Renewable Electricity Generation activities at a scale not meeting the definition of small and community scale distributed electricity generation) these automatically end up as discretionary activities under this rule. That is unreasonable as the ongoing	Amend ENG - R15 as follows: Large-scale renewable electricity generation activity excluding wind Upgrades, other than minor upgrades, and construction of renewable electricity generation activities (excluding wind) and renewable electricity generation activities not meeting rules R5, R9 and R10. Restricted Discretionary Activities. Discretion is limited to: a The benefits of the proposal to Aotearoa New Zealand meeting its zero carbon, climate change and greenhouse gas targets; b The benefits of the proposal to the local and regional community and to resilience for Te Tai o Poutini / the West Coast; c Any functional needs and operational needs associated with the design or location of the proposal; d The ability to mitigate any adverse effects of the proposal on the

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					operation of such activities is essential to the resilience and well being of the region, as well as to meeting the national direction. Manawa seeks that the rule is amended to restricted discretionary activity status, reworded for clarity and other amendments to the rule to ensure consistency with other parts of its submission (particularly those relating to terminology).	environment; e The degree to which the proposed activity will cause significant adverse effects on values identified and protected through Overlay Chapter provisions. Activity status where compliance not achieved: N/A
Buller District Council (S538)	S538.034	Energy	ENG - R15	Support	Rules 13 to 20 are supported.	Retain as notified.
Westpower Limited (S547)	S547.118	Energy	ENG - R15	Amend	For large scale generation activities in the Industrial zone.	Amend rule heading: ENG-R15 Large scale ... excluding wind not meeting Permitted Activity standards.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.129	Energy	ENG - R15	Amend	It is unclear what is meant by 'large scale'. What is large scale? There is also no direction to protect natural values.	Define or otherwise clarify 'large scale'. Include requirement that in order to be discretionary, the activity must comply with at least the ECO, NFL, CE, and NC chapters.
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.066	Energy	ENG - R16	Support	We support this rule.	Retain rule.
Manawa Energy Limited (Manawa Energy) (S438)	S438.054	Energy	ENG - R16	Support in part	Manawa does not consider it appropriate to single out wind farms and to give them an activity status that is restrictive. Many other comparable district plans place wind farms at restricted discretionary activity status and this is an appropriate status to give effect to the NPS-REG. Further, to simplify the provisions, this wind farm rule could be combined with rule R15 above. Manawa also considers it inappropriate	Amend ENG - R16 as follows Activity Status Restricted Discretionary Where: 1. This does not comply with New Zealand Standard NZS6808:2010 Acoustics - Wind Farm Noise. Discretion is limited to: a Degree of non-compliance with ENG - R5; b Locational, technical and operational constraints; c Benefits to the community.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					that a wind farm unable to comply with NZS 6608: 2010 Acoustics - Wind Farm Noise is afforded non-complying activity status. It is considered that discretionary status is appropriate to enable full consideration of the effects of wind farm noise. Discretionary activity status is commonly applied in other district plans that provide for wind farm noise above the NZS.	Activity status where compliance not achieved: Non-complying Discretionary
Buller District Council (S538)	S538.035	Energy	ENG - R16	Support	Rules 13 to 20 are supported.	Retain as notified.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.130	Energy	ENG - R16	Amend	The rule needs direction to protect natural values.	Include requirement that in order to be discretionary, the activity must comply with at least the ECO, NFL, CE, and NC chapters.
Westpower Limited (S547)	S547.119	Energy	Non-complying Activities	Amend	Does not include reference to Rule ENG-R6.	Insert new Rule for activities not in compliance with Rule ENG-R6: Activities in and around the Significant Electricity Distribution Lines that do not comply with Permitted Activity standardsActivity Status Non-ComplyingActivity Status where compliance not achieved: N/A.
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.067	Energy	ENG - R17	Support	We support this rule.	Retain rule.
Manawa Energy Limited (Manawa Energy) (S438)	S438.055	Energy	ENG - R17	Oppose	Manawa considers it inappropriate that a wind farm unable to comply with NZS 6608: 2010 Acoustics - Wind Farm Noise is afforded non-complying activity status. It is considered that discretionary status is appropriate.	Amend ENG - R17 as follows: ENG - R17 Any energy renewable electricity generation activity which does not comply with New Zealand Standards NZS6808:2010 Acoustics - Wind Farm Noise. Activity Status Non-Complying Discretionary

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Buller District Council (S538)	S538.036	Energy	ENG - R17	Support	Rules 13 to 20 are supported.	Retain as notified.
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.068	Energy	ENG - R18	Support	We support this rule.	Retain rule.
Buller District Council (S538)	S538.037	Energy	ENG - R18	Support	Rules 13 to 20 are supported.	Retain as notified.
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.069	Energy	ENG - R19	Support	We support this rule.	Retain rule.
Transpower New Zealand Limited (S299)	S299.050	Energy	ENG - R19	Amend	Transpower supports the default non-complying activity status. However, Transpower seeks amendments so that the rule only applies to activities within the National Grid Yard - 'in and around' is very vague and would give rise to potential plan interpretation and application issues. Transpower does not support and seeks deletion of reference to the term 'Significant Electricity Transmission Lines' as the term is not defined in the proposed plan, the RMA or any other higher order policy document, and gives rise potential for confusion with the National Grid which is addressed within the National Grid Yard (which is defined in the proposed plan). If the reference to 'transmission' is an error and instead the term is 'Significant Electricity Distribution Lines' (which is defined in the proposed plan) Transpower is neutral on its retention.	Amend the rule as follows: ENG - R19 Activities within and around the National Grid Yard and between the Significant Electricity Transmission Lines , that do not comply with Permitted Activity standards Activity Status Non-complying
Horticulture New Zealand (S486)	S486.021	Energy	ENG - R19	Oppose in part	Activities in and around SEDL should not be non-complying if the PA standards are not met. These should be Restricted	Amend ENG-R19 by deleting significant Electricity Distribution Lines and include as

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					Discretionary where the standards in NZECP34:2001 are not met.	a Restricted Discretionary activity.
Federated Farmers of New Zealand (S524)	S524.038	Energy	ENG - R19	Oppose in part	Activities in and around SETL should not be non-complying if the PA standards are not met. These should be Restricted Discretionary where the standards in NZECP34:2001 are not met.	Amend ENG-R19 by deleting significant Electricity Distribution Lines and include as a Restricted Discretionary activity.
Buller District Council (S538)	S538.038	Energy	ENG - R19	Support	Rules 13 to 20 are supported.	Retain as notified.
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.070	Energy	ENG - R20	Support	We support this rule.	Retain rule.
Manawa Energy Limited (Manawa Energy) (S438)	S438.056	Energy	ENG - R20	Oppose	Manawa considers that the non-complying status of renewable electricity activities not permitted, controlled, restricted discretionary or discretionary is not appropriate and does not reflect the enabling provisions and direction of the NPS - REG and the RPS. It considers that these activities should be provided for as restricted discretionary or discretionary activities. To achieve this, none of the renewable electricity activities should be covered by this rule.	Amend ENG - R20 as follows: Energy-a Activities that do not meet Rules ENG - R12, or ENG - R13 or ENG - R14 Activity Status: Non-Complying
Buller District Council (S538)	S538.039	Energy	ENG - R20	Support	Rules 13 to 20 are supported.	Retain as notified.
Westpower Limited (S547)	S547.120	Energy	ENG - R20	Amend	It already seems to be provided for in proposed ENG-R18.	Consider whether this rule is required or could be incorporated into ENGR18.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.131	Energy	ENG - R20	Amend	Reference needs to be made to R 15 and 16	Consequential change for activities that do not meet R15 and R16
Westland District Council (S181)	S181.002	Infrastructure	Infrastructure	Support	Westland District Council supports these Objectives, Policies and Rules	Retain the Objectives, Policies and Rules

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.071	Infrastructure	Infrastructure	Support in part	We support the objectives and policies within this section, particularly objectives relating to natural hazard resilience and the impacts of climate change. The West Coast/Te Tai o Poutini is already experiencing an increased frequency and severity of weather events which have particularly strained drinking water and waste water critical infrastructure.	Seek that an additional policy and rules are created for Drinking Water Source Protection Zones (SPZ), to ensure that critical drinking water infrastructure is protected and drinking water quality is maintained and improved.
West Coast Regional Council (S488)	S488.024	Infrastructure	Infrastructure	Amend		Surface water and stormwater objectives, policies, rules and accompanying maps are developed for all new zones in the region.
Buller Conservation Group (S552)	S552.010	Infrastructure	Infrastructure	Amend	There needs to be mention of municipal waste, and waste management in general.	Amend plan to address municipal waste, and waste management in general.
Frida Inta (S553)	S553.010	Infrastructure	Infrastructure	Amend	There needs to be mention of municipal waste, and waste management in general.	Amend to include municipal waste, and waste management in general.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.133	Infrastructure	Infrastructure	Amend	See Key Issue above for submission points - Where this chapter refers to biodiversity effects	Replace biodiversity effects with a specific requirement to give effect to the ECO chapter provisions and any other natural environment or district wide provisions.
Fire and Emergency New Zealand (S573)	S573.008	Infrastructure	Infrastructure	Support	For Fire and Emergency, it is important that adequate infrastructure is in place before enabling the development of these large growth areas, particularly those that are intended to be serviced with a reticulated water supply network. As such, Fire and Emergency supports the objectives and policies within the Infrastructure chapter insofar that they recognise the importance of providing for effective, resilient, efficient and safe infrastructure which maintains public health and safety.	No amendment sought

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
David Ellerm (S581)	S581.065	Infrastructure	Infrastructure	Amend		Identification of Te kinga potable supply bore located on Lot 4 DP 3957 Develop Te Kinga Groundwater source protection zone
Heritage New Zealand Pouhere Taonga (S140)	S140.011	Infrastructure	Overview	Support	HNZPT supports the clarification contained in the overview stating, 'Where an infrastructure activity is located within an overlay area (as identified in the planning maps) then the relevant overlay provisions apply'. We note that the Overlay Chapters include Historic Heritage.	Retain as proposed
Transpower New Zealand Limited (S299)	S299.052	Infrastructure	Overview	Amend	While the National Grid is addressed within the Energy Chapter, but the National Grid also falls within the definition of 'infrastructure' and therefore the overview needs to clearly state how the Infrastructure chapter would apply (given the National Grid falls within the definition). This sentence in the overview, along with the text in the overview of the Energy Chapter provide clear guidance on the application of each chapter's provision. Transpower supports the approach described in the overview.	... The Infrastructure Chapter also does not apply to energy activities nor National Grid activities as these are addressed in the Energy Chapter nor does it apply to Transport Activities that are addressed in the Transport Chapter.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.132	Infrastructure	Overview	Amend	It is not clear which "infrastructure" is addressed in this chapter.	Clarify the activities addressed by this chapter.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.463	Infrastructure	Overview	Amend	Further the wording "specified infrastructure" reflects terminology used in the NPSFM which has a specific meaning relating to regionally significant infrastructure.	Add: Infrastructure includes a range of structures, services and activities as defined - Definitions - Ngā Tautuhinga. This chapter sets out provisions with respect to the management of distribution pipelines, telecommunications networks, radio

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						communications networks, water supply and distribution, drainage and wastewater including sewage systems and networks and for network utilities other than where this relates to: Energy Activities, addressed in the ENG Chapter; Transport activities addressed in the TRN Chapter; or Airport activities, addressed in the Airport Zone chapter. Infrastructure relating to Port Activities is addressed in the Port Zone chapter. Any infrastructure not specifically addressed in those other chapters, is captured by the provisions of this chapter.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.464	Infrastructure	Overview	Amend		Amend reference to Overlay chapters in line with Key Issue above.
Grey District Council (S608)	S608.500	Infrastructure	Overview	Support in part	Some spelling errors in the definition for Reverse Sensitivity (perceived) as well as the bullet point for Transport (in an around) in the overview section. Recommend these be fixed.	Fix grammar errors as per comment
Chorus NZ Ltd, Spark NZ Trading Ltd, Vodafone NZ Ltd (S663)	S663.007	Infrastructure	Overview	Amend	The statement in the fifth paragraph of the overview that zone chapters do not apply to infrastructure managed in the infrastructure chapter is supported. However, by way of example Rule GIZ-R2 in the Industrial Zone chapter includes rules for masts, poles, aerials and antennas. This creates confusion. If this is indeed to apply to private equipment that is not part of a network utility network managed by the infrastructure chapter, the statement should include a statement to this effect to avoid confusion.	Add additional text to the statement in the fifth paragraph: Rules relating to aerials and antennas and their support masts in zone chapters do not apply to equipment installed and/or operated by a network utility operator, or delete any provisions relating to telecommunications equipment from all zone chapters.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Margaret Montgomery (S446)	S446.006	Infrastructure	Infrastructure Objectives	Support	Support the operation and maintenance of critical infrastructure;	Retain provisions that allow for the operation and maintenance of critical infrastructure.
Radio New Zealand (S476)	S476.044	Infrastructure	Infrastructure Objectives	Amend	Due to its integral civil defence role, RNZ considers the Proposed Plan needs to provide greater recognition and protection of RNZ's Facilities.	<p>The Proposed Plan should provide appropriate objectives that better recognise:</p> <ul style="list-style-type: none"> • The critical contribution that infrastructure and network utility operations (such as RNZ's Facilities) make to the social, economic and cultural wellbeing of the district, as well as health and safety; • The technical and operational constraints that limit the geographic location in which network utilities in general, and RNZ's Facilities in particular, can operate, particularly in relation to land use, subdivision and development; and • The need to avoid "reverse sensitivity" effects on network utilities for the benefit of the community.
Buller District Council (S538)	S538.040	Infrastructure	Infrastructure Objectives	Support in part	<p>Council generally support the objectives and policies for Infrastructure, with the exception of the following concerns.</p> <p>Council seeks to ensure all infrastructure has sufficient capacity to meet both the current and future needs of the District and requests that this is explicitly stated in the provisions. Council considers that new infrastructure needs to be provided in such a manner that it meets future</p>	<p>Remove any references to 'utility' from the objectives and policies.</p> <p>Amend Objective 1 as follows: To enable the safe, efficient and sustainable development, operation, maintenance and upgrading of utilities and infrastructure to meet the current and future needs of the West Coast/Te Tai o Poutini.</p>

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					<p>development demand.</p> <p>It is noted that some of the objectives and policies refer to 'infrastructure and utilities' but the definition of 'Infrastructure' in the Plan encompasses network utility operations, therefore it is suggested that any references to 'utility' is unnecessary and the provisions can be simplified.</p> <p>Policy 4(h) refers to the potential vesting of new infrastructure in the relevant Council or hapu entity. The introduction of 3 Waters means some infrastructure will be transferred to new central government entities, therefore it is suggested that the policy recognises this.</p>	
Chris & Jan Coll (S558)	S558.461	Infrastructure	Infrastructure Objectives	Support		Retain
Chris J Coll Surveying Limited (S566)	S566.461	Infrastructure	Infrastructure Objectives	Support		Retain
William McLaughlin (S567)	S567.051	Infrastructure	Infrastructure Objectives	Support		Retain
Laura Coll McLaughlin (S574)	S574.461	Infrastructure	Infrastructure Objectives	Support		Retain
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.072	Infrastructure	INF - O1	Support	We support this objective.	Retain objective.
KiwiRail Holdings Limited (S442)	S442.020	Infrastructure	INF - O1	Support	KiwiRail supports the intent of the objective to enable the safe and efficient development, operation, maintenance, and upgrading of infrastructure.	Retain as proposed

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Waka Kotahi NZ Transport Agency (S450)	S450.024	Infrastructure	INF - O1	Support	Waka Kotahi supports the objective as it provides for the development, operation, maintenance and upgrading of infrastructure to meet the needs of the West Coast/Te Tai o Poutini.	Retain as proposed.
Radio New Zealand (S476)	S476.014	Infrastructure	INF - O1	Amend		RNZ support the direction that provides for the continued operation, maintenance and upgrading of existing infrastructure.
New Zealand Defence Force (S519)	S519.009	Infrastructure	INF - O1	Support	NZDF considers that it is important to provide for the safe, efficient and sustainable development, operation and maintenance and upgrading of utilities and infrastructure, to meet the needs of the West Coast/Tai o Poutini.	Retain Objective as notified or wording to similar effect.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.135	Infrastructure	INF - O1	Amend	The objective needs to protect natural values.	Amend: To enable the ... needs of the West Coast/Te Tai o Poutini, where adverse effects can be appropriately managed accordance with the Natural Environment and District Wide chapters of this Plan.
Grey District Council (S608)	S608.501	Infrastructure	INF - O1	Support	Support without alteration.	Support without alteration.
Chorus NZ Ltd, Spark NZ Trading Ltd, Vodafone NZ Ltd (S663)	S663.009	Infrastructure	INF - O1	Support	The suite of INF objectives is appropriate in regard of the provision, protection and management of the effects infrastructure	Retain provision as notified
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.073	Infrastructure	INF - O2	Support	We support this objective.	Retain objective.
KiwiRail Holdings Limited (S442)	S442.021	Infrastructure	INF - O2	Support	The rail network can be vulnerable to adverse effects when incompatible subdivision, land use and development is located adjacent to an established rail line. KiwiRail supports the objective to	Retain as proposed

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					protect infrastructure from adverse effects.	
Waka Kotahi NZ Transport Agency (S450)	S450.025	Infrastructure	INF - O2	Support	Waka Kotahi supports the objective as it protects utilities and infrastructure from incompatible activities.	Retain as proposed.
Radio New Zealand (S476)	S476.015	Infrastructure	INF - O2	Support		RNZ supports the objective to protect utilities and infrastructure from incompatible land use. RNZ consider the objective should also specifically refer to reverse sensitivity effects.
New Zealand Defence Force (S519)	S519.010	Infrastructure	INF - O2	Support	It is important to protect infrastructure from the adverse of incompatible subdivision, land use and development.	Retain Objective as notified or wording to similar effect.
Grey District Council (S608)	S608.502	Infrastructure	INF - O2	Support in part	There is no definition of incompatible in terms of the protection of utilities and infrastructure from the adverse effects of incompatible subdivision, land use or development. What subdivision, land use or development does this objective refer to?	Clearly define incompatible in terms of the protection of utilities and infrastructure from the adverse effects of incompatible subdivision, land use or development.
Chorus NZ Ltd, Spark NZ Trading Ltd, Vodafone NZ Ltd (S663)	S663.010	Infrastructure	INF - O2	Support	The suite of INF objectives is appropriate in regard of the provision, protection and management of the effects infrastructure	Retain provision as notified
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.074	Infrastructure	INF - O3	Support	We support this objective.	Retain objective.
Waka Kotahi NZ Transport Agency (S450)	S450.026	Infrastructure	INF - O3	Support	Waka Kotahi supports the objective as it ensures the efficient provision and use of infrastructure by communities when used for subdivision, use and development of land.	Retain as proposed.
Grey District Council (S608)	S608.503	Infrastructure	INF - O3	Support in part	Recommend it is more clearly defined in this section as to where the onus is put, i.e. on the developers when subdividing	Recommend it is more clearly defined in this section as to where the onus is put, i.e. on the developers when subdividing

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Chorus NZ Ltd, Spark NZ Trading Ltd, Vodafone NZ Ltd (S663)	S663.011	Infrastructure	INF - O3	Support	The suite of INF objectives is appropriate in regard of the provision, protection and management of the effects infrastructure	Retain provision as notified
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.075	Infrastructure	INF - O4	Support	We support this objective.	Retain objective.
KiwiRail Holdings Limited (S442)	S442.022	Infrastructure	INF - O4	Support	The consideration for resilience and the potential impacts of climate change in infrastructure design and provision, is supported by KiwiRail	Retain as proposed
Waka Kotahi NZ Transport Agency (S450)	S450.027	Infrastructure	INF - O4	Support	Waka Kotahi supports the objective as it recognises natural hazard resilience and impacts of climate change in infrastructure design and provision.	Retain as proposed.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.136	Infrastructure	INF - O4	Amend	Location is a key factor when considering infrastructure that may be affected by natural hazards and climate change.	To consider natural hazard and biodiversity resilience and impacts of climate change in infrastructure location , design, and provision.
Grey District Council (S608)	S608.504	Infrastructure	INF - O4	Support	Support without alteration.	Support without alteration.
Toka Tū Ake EQC (S612)	S612.008	Infrastructure	INF - O4	Support	Support considering natural hazard mitigation and the effects of climate change	No change
Chorus NZ Ltd, Spark NZ Trading Ltd, Vodafone NZ Ltd (S663)	S663.012	Infrastructure	INF - O4	Support	The suite of INF objectives is appropriate in regard of the provision, protection and management of the effects infrastructure	Retain provision as notified
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.076	Infrastructure	INF - O5	Support	We support this objective.	Retain objective.
KiwiRail Holdings Limited (S442)	S442.023	Infrastructure	INF - O5	Support	KiwiRail supports recognition of the functional and operational need as well as the benefits of infrastructure.	Retain as proposed

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Waka Kotahi NZ Transport Agency (S450)	S450.028	Infrastructure	INF - O5	Support	Waka Kotahi supports the objective as it provides for infrastructure that has a functional and operational need, and has a positive effect that is local, regional, or national.	Retain as proposed.
Radio New Zealand (S476)	S476.016	Infrastructure	INF - O5	Support		RNZ supports this objective, in particular the recognition of technical, operation and functional needs of infrastructure and that it may have positive effects.
New Zealand Defence Force (S519)	S519.011	Infrastructure	INF - O5	Support	It is important for the policy framework to recognise the functional and operational need of infrastructure along with the positive effects of infrastructure on the City, while acknowledging that infrastructure can have adverse effects on the environment which need to be managed.	Retain Objective as notified or wording to similar effect.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.137	Infrastructure	INF - O5	Amend	The WCRPS includes specific direction for considering biodiversity adverse effects, and for RSI effects generally.	The adverse effects of infrastructure on the environment are minimized avoided, remedied, and mitigated in accordance with the Natural Environment and District Wide chapters of this Plan ", while recognising:...
Grey District Council (S608)	S608.505	Infrastructure	INF - O5	Support	Support without alteration.	Support without alteration.
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.091	Infrastructure	INF - O5	Amend	To clarify that effects on the environment include Poutini Ngāi Tahu values and to be consistent with INF-P2.	The adverse effects of infrastructure on the environment are minimised, while recognising: a. The functional and operational needs of infrastructure; b. Poutini Ngāi Tahu requirements for discharge of wastewater to land; and c. That positive effects of infrastructure may be realised locally, regionally, or nationally.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Chorus NZ Ltd, Spark NZ Trading Ltd, Vodafone NZ Ltd (S663)	S663.013	Infrastructure	INF - O5	Support	The suite of INF objectives is appropriate in regard of the provision, protection and management of the effects infrastructure	Retain provision as notified
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.077	Infrastructure	Infrastructure Policies	Amend	we recommend an overlay layer for drinking water infrastructure be developed for West Coast community networked drinking water supply sources in accordance with Resource Management (National Environmental Standards for Sources of Human Drinking Water) Regulations 2007. A Drinking Water SPZ would ensure that any water source used for drinking water supply is protected from potential adverse effects on the quality of the drinking water on the West Coast/ Te Tai o Poutini. Further, having a SPZ around drinking water sources may have avoided the damage that mining activities caused to the Westport and Ross drinking water supplies recently. The Canterbury Regional Council has incorporated Drinking Water SPZ in their policies (Canterbury Land and Water Regional Plan, 2018). We support this and recommend that the West Coast / Te Tai o Poutini includes this in their plan to ensure the protection of the drinking water supply and the health of the population.	We recommend including the additional policy as follows: INF-P7: Minimise the risk of adverse effects by subdivision, development, and activities on drinking water sources through a Drinking Water Source Protection Zone (SPZ).
Radio New Zealand (S476)	S476.045	Infrastructure	Infrastructure Policies	Amend		The Proposed Plan should provide appropriate policies that better recognise: <ul style="list-style-type: none"> The critical contribution that infrastructure and network utility operations (such as RNZ's Facilities) make to the social, economic and cultural wellbeing

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<p>of the district, as well as health and safety;</p> <ul style="list-style-type: none"> The technical and operational constraints that limit the geographic location in which network utilities in general, and RNZ's Facilities in particular, can operate, particularly in relation to land use, subdivision and development; and The need to avoid "reverse sensitivity" effects on network utilities for the benefit of the community.
Buller District Council (S538)	S538.041	Infrastructure	Infrastructure Policies	Support in part	<p>Council generally support the objectives and policies for Infrastructure, with the exception of the following concerns.</p> <p>Council seeks to ensure all infrastructure has sufficient capacity to meet both the current and future needs of the District and requests that this is explicitly stated in the provisions. Council considers that new infrastructure needs to be provided in such a manner that it meets future development demand.</p> <p>It is noted that some of the objectives and policies refer to 'infrastructure and utilities' but the definition of 'Infrastructure' in the Plan encompasses network utility operations, therefore it is suggested that any references to 'utility' is unnecessary and the provisions can be simplified.</p> <p>Policy 4(h) refers to the potential vesting of new infrastructure in the relevant</p>	<p>Remove any references to 'utility' from the objectives and policies. Amend Policy 4 as follows: Ensure that subdivision and development, is adequately serviced to meet the current and future needs including: h. Where new infrastructure is developed, that there is adequate provision for ongoing maintenance either by the vesting of the infrastructure in the relevant Council, Water Service Entity or in the case of papakainga developments, that an ongoing hapu entity may be responsible for maintenance; and</p>

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					Council or hapu entity. The introduction of 3 Waters means some infrastructure will be transferred to new central government entities, therefore it is suggested that the policy recognises this.	
Chris & Jan Coll (S558)	S558.472	Infrastructure	Infrastructure Policies	Support		Retain
Chris J Coll Surveying Limited (S566)	S566.472	Infrastructure	Infrastructure Policies	Support		Retain
William McLaughlin (S567)	S567.052	Infrastructure	Infrastructure Policies	Support		Retain
Laura Coll McLaughlin (S574)	S574.472	Infrastructure	Infrastructure Policies	Support		Retain
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.078	Infrastructure	INF - P1	Support	We support this policy.	Retain policy.
KiwiRail Holdings Limited (S442)	S442.024	Infrastructure	INF - P1	Support	KiwiRail supports the recognition of the positive social, cultural and environmental benefits from the development, continued operation and upgrading of utilities and infrastructure.	Retain as proposed
Waka Kotahi NZ Transport Agency (S450)	S450.029	Infrastructure	INF - P1	Support	Waka Kotahi supports the policy as it recognises that the continued operation and upgrading of utilities and infrastructure provides positive benefits.	Retain as proposed.
Radio New Zealand (S476)	S476.017	Infrastructure	INF - P1	Support		RNZ supports recognition of the benefits associated with infrastructure. RNZ considers the benefits of critical infrastructure to the region could be highlighted in this policy. Amend as follows: "Recognise and provide for the positive social, economic, cultural and environmental benefits from the development, continuing operation and

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						upgrading of utilities and infrastructure, in particular critical infrastructure. "
New Zealand Defence Force (S519)	S519.012	Infrastructure	INF - P1	Support	Recognising the positive social, economic, cultural and environmental benefits from the development, operation and upgrading of infrastructure is important and appropriate.	Retain Policy as notified or wording to similar effect.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.138	Infrastructure	INF - P1	Amend	The WCRPS does not require the provision of RSI in all cases. Nor does it set direction for provision of infrastructure generally; it is specific to RSI.	Recognise and provide for the positive social, economic, cultural, and environmental benefits from the development, continued operation and upgrading of network utilities and infrastructure.
Grey District Council (S608)	S608.506	Infrastructure	INF - P1	Support in part	While INF - O1 is to enable development, operation, maintenance and upgrading of utilities and infrastructure, INF - P1 does not specify maintenance as being recognised and provided for. The maintenance of infrastructure should be provided for within this policy	Reword to the following "Recognise and provide for the positive social, economic, cultural and environmental benefits from the development, continued operation, maintenance and upgrading of utilities and infrastructure."
Chorus NZ Ltd, Spark NZ Trading Ltd, Vodafone NZ Ltd (S663)	S663.014	Infrastructure	INF - P1	Support	Policy properly recognised the benefits of infrastructure.	Retain provision as notified
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.079	Infrastructure	INF - P2	Support	We strongly support this policy and note the potential for public health issues when critical infrastructure is adversely impacted by natural hazards and climate change. We are aware of adverse effects to sources of public water supplies being caused by storm events.	Retain policy.
KiwiRail Holdings Limited (S442)	S442.025	Infrastructure	INF - P2	Support	KiwiRail supports recognition that the adverse effects of infrastructure cannot always be managed and the inclusion of a policy framework how to assess effects	Retain as proposed

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					in these situations with consideration for the following in particular: Locational, technical and operational constraints; Resilience to natural hazards and climate change; Poutini Ngāi Tahu preference for discharge of wastewater to land; Benefits of co-location of infrastructure; and The need to minimise adverse effects on the environment.	
Radio New Zealand (S476)	S476.018	Infrastructure	INF - P2	Support		RNZ supports this policy, particularly the recognition that locational, technical and operational constraints ought to be considered. Subject to RNZ's request relief on the definition of "critical infrastructure", RNZ consider the policy ought to specifically provide for the importance of critical infrastructure. Amend as follows: "Manage the design and location of utilities and infrastructure, including when sited in overlays in a way which considers: ... e. That positive effects of infrastructure, in particular critical infrastructure , may be realised locally, regionally, or nationally; and f..."
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.139	Infrastructure	INF - P2	Amend	'Minimise' is not sufficient to give effect to s5 of the RMA which requires adverse effects to be avoided, remedied, and mitigated on the environment as well as other matters including safeguarding the life supporting of ecosystems.	Manage the design and location of network utilities and infrastructure, including when sited in overlays in a way which considers: a. Locational, technical, and operational constraints; x. whether there are alternative locations or a functional need to locating within an Overlay area or any Significant Natural Area (being areas meeting criteria in Appendix 1 of the WCRPS whether mapped in the Plan

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						or not); b. Resilience of the natural environment and of the infrastructure to natural hazards and climate change;... and f. The need to minimise avoid, remedy, or mitigate adverse effects on the environment in accordance with the Natural Environment and District Wide chapters of this Plan"
Janie Cook (S594)	S594.003	Infrastructure	INF - P2	Oppose	Homeowners losing the right to consume rain that falls on their property.	Delete
Department of Conservation (S602)	S602.035	Infrastructure	INF - P2	Oppose	Amend Policy INF-P2 so that it aligns with the functional and locational needs definitions of the Plan, and applies the effects management hierarchy to Schedules, SNAs and Overlay Areas.	Amend Policy INF-P2: Manage the design and location of utilities and infrastructure, including when sited in overlays in a way which considers: a. Locational, technical and operational constraints in accordance with the infrastructures functional needs and operational needs; b. Resilience to natural hazards and climate change; c. Poutini Ngāi Tahu requirements for discharge of wastewater to land; d. Benefits of co-location of infrastructure; e. That positive effects of infrastructure may be realised locally, regionally, or nationally; and f. The need to minimise adverse effects on the environment by applying the effects management hierarchy within Schedules, SNAs and Overlay Chapter areas
Grey District Council (S608)	S608.507	Infrastructure	INF - P2	Support in part	The definition of wastewater should allow for the separate generation of greywater and blackwater to be considered as wastewater.	Alter the definition of wastewater to allow for it to include the generation of greywater or blackwater as follows: "means any combination of two one or more of the following wastes: sewage,

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						greywater or industrial and trade waste."
Toka Tū Ake EQC (S612)	S612.009	Infrastructure	INF - P2	Support	Support the management of infrastructure and utilities in a way which considers resilience	No change
Chorus NZ Ltd, Spark NZ Trading Ltd, Vodafone NZ Ltd (S663)	S663.015	Infrastructure	INF - P2	Amend	Policy INF-P2 is generally supported except that it is requested that the language in Clause (a) be amended to operational need and functional need to reflect the terms used in the National Planning Standards and the definitions in the Plan.	Amend Policy INF-P12(a) as follows: (a) Locational, technical and operational constraints operational need and functional need
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.080	Infrastructure	INF - P3	Support	We support this policy.	Retain policy.
KiwiRail Holdings Limited (S442)	S442.026	Infrastructure	INF - P3	Amend	KiwiRail supports the protection of infrastructure from reverse sensitivity effects of subdivision, use and development that may constrain or compromise the safety and efficiency of the rail network. Amendments are requested to ensure the policy applies to all rail activities, not just the operation of the rail network.	Amend as follows: Manage reverse sensitivity effects from subdivision, use and development, on utilities and infrastructure to ensure the # safe, secure and efficient operation , maintenance, repair, upgrading, removal and development of infrastructure.
Waka Kotahi NZ Transport Agency (S450)	S450.030	Infrastructure	INF - P3	Support	Waka Kotahi supports the policy as it manages the effects of reverse sensitivity on infrastructure to ensure the safe, secure, and efficient operation.	Retain as proposed.
Radio New Zealand (S476)	S476.019	Infrastructure	INF - P3	Amend		RNZ support a policy that addresses reverse sensitivity effects. Subject to its relief on the definition of "critical infrastructure", RNZ seek that this is expressly included in the policy. Further, RNZ considers the policy wording should be strengthened to recognise the significant chilling effect reverse sensitivity

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						can have on infrastructure, and the difficulty in addressing this effect once it arises. Amend as follows: "Manage Avoid reverse sensitivity effects from subdivision, use and development, on utilities and infrastructure, in particular critical infrastructure , to ensure their safe, secure and efficient operation."
New Zealand Defence Force (S519)	S519.013	Infrastructure	INF - P3	Support	It is important for the Policy framework to require the management of reverse sensitivity effects from subdivision, use and development, on utilities and infrastructure.	Retain Policy as notified or wording to similar effect.
Grey District Council (S608)	S608.508	Infrastructure	INF - P3	Support	Support without alteration.	Support without alteration.
Chorus NZ Ltd, Spark NZ Trading Ltd, Vodafone NZ Ltd (S663)	S663.016	Infrastructure	INF - P3	Support	Policy properly recognises the need to manage the adverse effects of other activities on infrastructure	Retain provision as notified
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.081	Infrastructure	INF - P4	Support	We strongly support this policy and note the on-going public health issues still being caused by subdivisions where the listed infrastructure such as sewerage and waste water treatment plant is still not in place; for instance the Franz Alpine subdivision.	Retain policy.
Waka Kotahi NZ Transport Agency (S450)	S450.031	Infrastructure	INF - P4	Support	Waka Kotahi supports this policy as it ensures that subdivision and development is serviced with safe and efficient vehicle access and has treatment and safe disposal of stormwater that does not result in increased flooding and erosion risk.	Retain as proposed.
Royal Forest and Bird Protection Society of New	S560.140	Infrastructure	INF - P4	Amend	The ability to ensure this should be a consideration prior to subdivision and development and should include constraints such as where adverse	Ensure that subdivision and development, is can be adequately serviced including: In site selection and design considerations, assessing the adverse

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Zealand Inc. (Forest & Bird) (S560)					effects on natural values can and should be avoided or cannot be adequately avoided, remedied, or mitigated and development is inappropriate.	effects of subdivision and development as well as adverse effects of services when determining whether the subdivision or development should occur in that location in the first place; and that adequate services includes:
Grey District Council (S608)	S608.509	Infrastructure	INF - P4	Support in part	The definition of wastewater should allow for the separate generation of greywater and blackwater to be considered as wastewater.	Alter the definition of wastewater to allow for it to include the generation of greywater or blackwater as follows: "means any combination of two one or more of the following wastes: sewage, greywater or industrial and trade waste."
Toka Tū Ake EQC (S612)	S612.010	Infrastructure	INF - P4	Support	Support the treatment and safe disposal of stormwater	No change
Chorus NZ Ltd, Spark NZ Trading Ltd, Vodafone NZ Ltd (S663)	S663.017	Infrastructure	INF - P4	Support	Policy properly recognises the need to adequately service new subdivision and development, including telecommunications	Retain provision as notified
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.082	Infrastructure	INF - P5	Support	We support this policy.	Retain policy.
KiwiRail Holdings Limited (S442)	S442.027	Infrastructure	INF - P5	Support	Stormwater discharge onto the rail corridor has the potential to damage the rail network and disrupt the safe and efficient function of the railway. KiwiRail supports the policy direction and provision for new allotments to manage stormwater onsite.	Retain as proposed
Waka Kotahi NZ Transport Agency (S450)	S450.032	Infrastructure	INF - P5	Support	Waka Kotahi supports this policy as it seeks to minimise the effects of stormwater run-off, which includes reducing the flooding risk to roads.	Retain as proposed.
Grey District Council (S608)	S608.510	Infrastructure	INF - P5	Support	Support without alteration.	Support without alteration.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Toka Tū Ake EQC (S612)	S612.011	Infrastructure	INF - P5	Support	We support the development of infrastructure which minimises stormwater runoff, thur reducing flooding risk.	No change
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.092	Infrastructure	INF - P5	Support	for c. It is culturally offensive to discharge wastewater to water.	Retain as notified
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.093	Infrastructure	INF - P5	Amend	Adding treatment to the policy provides for Poutini Ngāi Tahu values as well as safeguards the community wellbeing.	Minimise the effect of stormwater run-off associated with development activity, including requirements for onsite detention and treatment , upgrades to pump networks and roadside drainage networks where necessary, to reduce flooding risk to roads and property.
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.083	Infrastructure	INF - P6	Support	We support this policy.	Retain policy.
KiwiRail Holdings Limited (S442)	S442.028	Infrastructure	INF - P6	Support	KiwiRail supports policy that recognises the benefits that new technologies can bring to rail in terms of efficiency of the operation and safety and resilience of the network.	Retain as proposed
Radio New Zealand (S476)	S476.020	Infrastructure	INF - P6	Support		RNZ support this policy and seek that it is retained as notified.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.141	Infrastructure	INF - P6	Support		Retain
Grey District Council (S608)	S608.511	Infrastructure	INF - P6	Support	Support without alteration.	Support without alteration.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Chorus NZ Ltd, Spark NZ Trading Ltd, Vodafone NZ Ltd (S663)	S663.018	Infrastructure	INF - P6	Support	Policy properly recognises the need to adequately service new subdivision and development, including telecommunications	Retain provision as notified
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.084	Infrastructure	Infrastructure Rules	Amend	We support the rules in this section, however we recommend that additional rules be added for a Drinking Water Source Protection Zone (SPZ). Additionally, as discussed in INF-P7, we recommend that an overlay layer be developed for Drinking Water Source Protection Zones for West Coast community networked drinking water supply sources in accordance with Resource Management (National Environmental Standards for Sources of Human Drinking Water) Regulations 2007.	Include additional Drinking Water Source Protection Zone (SPZ) overlay rules within this section. We recommend that Drinking Water SPZ are fully excluded from mineral prospecting, exploration and extraction activities, and other activities that may cause adverse effects to drinking water. We want to ensure that incidents similar to those affecting the Ross water supply do not happen again on the West Coast.
Paul Finlay (S408)	S408.002	Infrastructure	Infrastructure Rules	Amend	Provision for an area of 2000m2 (C. 50m x 40m) at a location near Martyr Saddle, Martyr River, South Westland. Purpose : Erection of a building, with instruments and antennae for relaying the first movement of rupture of the Alpine Fault.	Ensure rules provide for monitoring building and equipment to pick up the movement of the plates and Alpine Fault.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.134	Infrastructure	Infrastructure Rules	Amend	This is not the appropriate location for this information. These notes relate to where infrastructure is addressed in the Plan and are relevant to provisions beyond just rules.	Incorporate notes 2, 3 and 4 into the overview and clarify the infrastructure addressed in this chapter and what is addressed in other chapters.
Grey District Council (S608)	S608.008	Infrastructure	Infrastructure Rules	Oppose in part	It is sought that the SASM overlay is removed and sites re-assessed/reviewed	Remove reference to "Site or Area of Significance to Māori"
Chorus NZ Ltd, Spark NZ Trading Ltd, Vodafone NZ Ltd (S663)	S663.019	Infrastructure	Infrastructure Rules	Amend	Note 2 needs to reflect that the NESTF 2016 does not regulate all new poles and antennas, and that the district plan also applies where regulated equipment does not meet permitted standards	Amend Note 2 as follows: The installation and operation of telecommunications facilities (such as cabinets, antennas, poles, small cell-units and telecommunications lines) undertaken by a telecommunications facility operator are controlled in some instances by the

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						Resource Management (National Environmental Standards for Telecommunications Facilities) Regulations 2016, separate to Te Tai o Poutini Plan. Te Tai o Poutini Plan applies where these telecommunications facilities are either not covered by the Regulations, are covered but do not meet permitted standards of the Regulations, or are located within the following overlays: ...
Chorus NZ Ltd, Spark NZ Trading Ltd, Vodafone NZ Ltd (S663)	S663.020	Infrastructure	Permitted Activities	Amend	Add new permitted activity rules for underground lines and back up electricity generators. Other than where restricted in overlays due to ground disturbance, underground lines should be enabled. Back up generators also need to be provided for to ensure during power outages that critical infrastructure can continue to operate.	Add new permitted activity rules to allow for underground lines and back up electricity generators
Branch 49 (Westland) of the New Zealand Association of Radio Transmitters (Inc.). (S109)	S109.001	Infrastructure	INF - R1	Amend	We believe that amateur radio activity needs it's own section in the plan - for ease of identifying qualifying activity and understanding. Amateur GURL lists permitted frequencies up to 1000 GHz.	A new rule specifically for Amateur Radio Communications as a permitted activity be included with proposed wording as below. Amateur Radio Communications. 1. Amateur Radio Communication means that communication permitted by the General User Licence (Radio) (ZZ) for Amateur Radio Operators - issued Pursuant to Regulation 9 of the Radiocommunications Regulations 2001 ("Regulations") made under section 116(1)(b) of the Radiocommunications Act 1989 for the transmission of radio waves by amateur radio operators in New Zealand, for the purpose of communications in the amateur radio service in accordance with

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<p>the applicable terms, conditions and restrictions of such licence. Operators must have: [1] a current General Amateur Operator's Certificate of Competency (GAOC), and [2] a callsign.</p> <p>2. The following equipment shall be permitted under Amateur Radio Communications:</p> <p>a. A single tower with a maximum height of 25 metres.</p> <p>b. Four supplementary poles each having a maximum height of 15 metres, or including an antenna or lightning spike, 20 metres.</p> <p>c. A transmission building (including ancillary buildings) with a maximum area of 250 square metres. This shall apply in cases where transmission equipment is not located in an existing building, such as a house or shed/garage.</p> <p>3. The following equipment attached to or erected on the existing tower and buildings or at the site on a permanent basis (in addition to the masts referred to above):</p> <p>a. radio communication antennas including whip, grid, yagi, dipoles and panels or similar, and ancillary equipment, but no single dish or panel antenna shall have a solid frontal surface area greater than 7 square metres or 2.5 metres in diameter in the case of dish antenna unless otherwise coming within the above mentioned sections and/or Regulations.</p> <p>4. Any beacon or repeater established per the above mentioned Regulations shall be allowed.</p> <p>a. Where such repeater or beacon is</p>

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<p>permanently established and co-located in the premises of another qualifying operator/service (such as Kiwirail, Chorus, Department of Conservation etc) it shall meet any necessary conditions as agreed with that operator/service - such as not creating any unwanted interference with the operation of the transmission equipment of the other operator/service.</p> <p>5. Temporary or emergency operation of radio transmission equipment and antenna systems shall be permitted for a period of 7 days without notification - so long as no undue interference is created. Periods of operation longer than 7 days should be notified to the Regional/District Council concerned, with the reason for the temporary/emergency operation provided and indication of timeframe the communication is needed.</p> <p>a. With respect to any temporary or emergency operation of amateur radio equipment, the amateur radio operator(s) involved shall comply with any lawful direction from any officer if the Regional/District Council and/or Police or Civil Defence Officer.</p>
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.085	Infrastructure	INF - R1	Support	We support this rule.	Retain rule.
Radio New Zealand (S476)	S476.021	Infrastructure	INF - R1	Support		Although RNZ's activities are authorised by designations, RNZ support a permitted activity standard for infrastructure. RNZ already comply with NZS 2772.1:1999 and support its inclusion in

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						the Proposed Plan.
Buller District Council (S538)	S538.042	Infrastructure	INF - R1	Support in part	Rule 1 is supported but the reference in the heading to 'permitted' is not needed as the rule sits under a general heading of Permitted Activities.	Amend the heading of Rule 1 as follows: Infrastructure Permitted Activity Performance Standards
Chris & Jan Coll (S558)	S558.483	Infrastructure	INF - R1	Support		Retain
Chris J Coll Surveying Limited (S566)	S566.483	Infrastructure	INF - R1	Support		Retain
William McLaughlin (S567)	S567.053	Infrastructure	INF - R1	Support		Retain
Laura Coll McLaughlin (S574)	S574.483	Infrastructure	INF - R1	Support		Retain
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.086	Infrastructure	INF - R2	Support	We support this rule.	Retain rule.
Waka Kotahi NZ Transport Agency (S450)	S450.033	Infrastructure	INF - R2	Support	Waka Kotahi supports this rule is it allows for permitted temporary network activities by network utility operators, which are either in response to a national/regional/local state emergency for up to 24 months or allow for additional capacity for a period up to four weeks.	Retain as proposed.
Buller District Council (S538)	S538.043	Infrastructure	INF - R2	Support	Rules 2 is supported.	Retain as notified.
Chris & Jan Coll (S558)	S558.494	Infrastructure	INF - R2	Support		Retain
Royal Forest and Bird Protection Society of New	S560.142	Infrastructure	INF - R2	Amend	How will the council know they have run out of capacity where this is used by permitted activities? This could result in	Amend to a controlled activity so that council can assess capacity.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Zealand Inc. (Forest & Bird) (S560)					significant environmental adverse effects occurring.	
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.143	Infrastructure	INF - R2	Amend	The permitted activities do not protect natural values.	Include standard that this must also meet the permitted standards of the ECO, ONFL, CE, EW, and NC chapters.
Chris J Coll Surveying Limited (S566)	S566.494	Infrastructure	INF - R2	Support		Retain
William McLaughlin (S567)	S567.054	Infrastructure	INF - R2	Support		Retain
Laura Coll McLaughlin (S574)	S574.494	Infrastructure	INF - R2	Support		Retain
Grey District Council (S608)	S608.512	Infrastructure	INF - R2	Support in part	Clarification is requested as to whether any building such as those that do not generate human wastewater are required to connect to water, wastewater or stormwater networks, i.e. a carport. The definition of wastewater should allow for the separate generation of greywater and blackwater to be considered as wastewater.	Reword the permitted activity standard to clarify what buildings are required to connect to reticulated services as follows: "A building or structure in which human wastewater is generated is serviced by, and capacity exists within the reticulated water supply, wastewater and stormwater network." An advice note is required as connection are only of right for residential zoned land. Approval is required from Network Utility Operator. Alter the definition of wastewater to allow for it to include the generation of greywater or blackwater as follows: "means any combination of two one or more of the following wastes: sewage, greywater or industrial and trade waste."
Toka Tū Ake EQC (S612)	S612.012	Infrastructure	INF - R2	Support		Retain
Te Runanga o Ngai Tahu, Te Runanga	S620.094	Infrastructure	INF - R2	Amend	Clarifies must be able to be treated by the network	INF-R2 Activity Status Permitted

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
o Ngati Waewae, Te Runanga o Makaawhio (S620)						Where: 1. The building is serviced by, and capacity exists within the reticulated water supply, wastewater or stormwater networks Advice Note: Capacity for the purpose of this rule includes volume and the ability for the network to control the amount of water-borne contaminants, litter and sediments as set out in the consents for the network.
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.087	Infrastructure	INF - R3	Support	We support this rule.	Retain rule.
Buller District Council (S538)	S538.044	Infrastructure	INF - R3	Support in part	While Council has no issue with Rule 3, it queries whether it has any relevance to the region. In the Buller District there are no existing gas pipelines.	If Rule 3 is not relevant to the region, delete.
Chris & Jan Coll (S558)	S558.505	Infrastructure	INF - R3	Support		Retain
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.144	Infrastructure	INF - R3	Amend	The permitted activities do not protect natural values.	Include standard that this must also meet the permitted standards of the ECO, ONFL, CE, EW, and NC chapters.
Chris J Coll Surveying Limited (S566)	S566.505	Infrastructure	INF - R3	Support		Retain
William McLaughlin (S567)	S567.055	Infrastructure	INF - R3	Support		Retain
Laura Coll McLaughlin (S574)	S574.505	Infrastructure	INF - R3	Support		Retain
Te Mana Ora (Community and Public Health) of the	S190.088	Infrastructure	INF - R4	Support	We support this rule.	Retain rule.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
NPWS/ Te Whatu Ora (S190)						
KiwiRail Holdings Limited (S442)	S442.029	Infrastructure	INF - R4	Support	KiwiRail supports the permitted activity status of temporary network activities, subject to standards.	Retain as proposed
Radio New Zealand (S476)	S476.022	Infrastructure	INF - R4	Support		Although RNZ's activities are authorised by designations, RNZ support a permitted activity rule for temporary network activities in the event RNZ needs to temporarily undertake activities not authorised by the designation.
Buller District Council (S538)	S538.045	Infrastructure	INF - R4	Support in part	<p>Rule 4 is supported but for consistency it is suggested that the rule should refer to 'Temporary Network Utilities' rather than 'Temporary Network Activities' and a Network Utility should be defined. While a very minor point, this provides consistency across the rule framework.</p> <p>While Network Utility Operator is defined, there is no equivalent definition of a 'Network Utility' and Council seeks that this is included given the reference in this rule and others e.g. Rule 8.</p>	<p>Amend Rule 4 as follows:</p> <p>Temporary Network Activities Utilities</p> <p>2. The temporary network activity utility is:...</p> <p>Insert a definition for 'Network Utility' into the Definition Section.</p>
Chris & Jan Coll (S558)	S558.516	Infrastructure	INF - R4	Support		Retain
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.145	Infrastructure	INF - R4	Amend	The permitted activities do not protect natural values.	Include standard that this must also meet the permitted standards of the ECO, ONFL, CE, EW, and NC chapters.
Chris J Coll Surveying Limited (S566)	S566.516	Infrastructure	INF - R4	Support		Retain
William McLaughlin (S567)	S567.056	Infrastructure	INF - R4	Support		Retain

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Laura Coll McLaughlin (S574)	S574.516	Infrastructure	INF - R4	Support		Retain
Grey District Council (S608)	S608.513	Infrastructure	INF - R4	Support	Support without alteration.	Support without alteration.
Chorus NZ Ltd, Spark NZ Trading Ltd, Vodafone NZ Ltd (S663)	S663.021	Infrastructure	INF - R4	Amend	This rule allows for temporary network utilities for up to 24 months in regard to emergency declarations. Otherwise they are limited to 4 weeks, including for holiday surge capacity. An increased period of 12 months is sought to cater for construction/re-construction activity (e.g. a temporary site may be installed to retain service while an existing facility is moved or needs to be temporarily taken of a building while it is renovated	Amend Rule INF-R4 as follows: Activity Status Permitted Where: 1. The temporary network is operated by a network utility operator; 2. The temporary network activity is: i. For up to a period of 24 months following a national, regional or local state of emergency declaration; or ii. For up to a period of four weeks to provide for additional capacity; and oriii. For a period of up to 12 months as part fo construction or re-construction activity; and
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.089	Infrastructure	INF - R5	Support	We support this rule.	Retain rule.
West Coast Regional Council (S488)	S488.008	Infrastructure	INF - R5	Amend	Some of the existing hydrology structures in remote hill and mountain areas have antennae that are more than 4m in height, to avoid radio interference caused by surrounding mountains and terrain. Future new monitoring structures in the same type of topography may also not meet the 4m height limit for the same reason. Hydrology staff advise that the Haast River @ Deelaw structure located at Mt Deelaw is the tallest monitoring structure at approximately 7-8m. It needs to be this high as it has a long distance to broadcast rainfall data. The environmental effects of taller hydrology	Amend the height limit in the Permitted Infrastructure Rule INF - R5, Condition 1 to 10m.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					monitoring structures and aerals is minimal in remote locations. Council considers that in these situations, the 4m height limit is unreasonable, especially as it is a substantial change from the 30m height limit in Rural Zones in the operative District Plans. Given the large area of rural and Public Conservation Land on the West Coast, and that there will not be a proliferation of hydrology monitoring structures, Council seeks that permitted Rule INF - R5 be amended to provide for a height limit for hydrology monitoring structures of 10m, to provide for future extensions to the network.	
Buller District Council (S538)	S538.046	Infrastructure	INF - R5	Oppose in part	<p>While the permitted activity status for environmental and extreme weather monitoring equipment is supported, given its importance to the District it is requested that no height or area standards are imposed. Such equipment is generally small scale and unlikely to be visually intrusive.</p> <p>Council seeks that 'environmental monitoring equipment' is combined with 'meteorological facilities' (Rule 6 below) into a single permitted activity rule with Rule 5 removed. The reference to 'extreme weather event monitoring' is not considered necessary as it is captured within the meaning of 'environmental monitoring'.</p>	Delete Rule 5. Consequential amendment to Rule 19.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.146	Infrastructure	INF - R5	Amend	The permitted activities do not protect natural values.	Include standard that this must also meet the permitted standards of the ECO, ONFL, CE, EW, and NC chapters.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Grey District Council (S608)	S608.514	Infrastructure	INF - R5	Support in part	The definition of height refers to a specified reference point which is not clear as to what it is. It is requested that this be made clear in the definition or in the provision, i.e. existing ground level.	Alter the definition of Height or specific provision to include the specified reference point, i.e.: "means the vertical distance between existing ground level and the highest part of any feature, structure or building above that point."
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.090	Infrastructure	INF - R6	Support	We support this rule.	Retain rule.
Buller District Council (S538)	S538.047	Infrastructure	INF - R6	Oppose in part	<p>While the permitted activity status for meteorological facilities is supported, given its importance to the District it is suggested that no performance standards are imposed.</p> <p>It is noted that there is no permitted activity rule for navigational aids and beacons. It is assumed that this is an oversight as provision is made for these as a discretionary activity (Rule INF-R18).</p> <p>Council seeks that Rules 5 and 6 are combined into a single permitted activity rule with no standards and that navigational aids and beacons are included.</p>	<p>Amend Rule 6 as follows: Navigational aids/beacons, environmental monitoring equipment and Meteorological Facilities</p> <p>Activity Status Permitted Where: 1. These are located in a RURZ Zone or INZ - Industrial Zone. Consequential amendments to Rules 18 & 20.</p>
Chris & Jan Coll (S558)	S558.527	Infrastructure	INF - R6	Support		Retain
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.147	Infrastructure	INF - R6	Amend	The permitted activities do not protect natural values.	Include standard that this must also meet the permitted standards of the ECO, ONFL, CE, EW, and NC chapters.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Chris J Coll Surveying Limited (S566)	S566.527	Infrastructure	INF - R6	Support		Retain
William McLaughlin (S567)	S567.057	Infrastructure	INF - R6	Support		Retain
Laura Coll McLaughlin (S574)	S574.527	Infrastructure	INF - R6	Support		Retain
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.091	Infrastructure	INF - R7	Support	We support this rule.	Retain rule.
KiwiRail Holdings Limited (S442)	S442.030	Infrastructure	INF - R7	Amend	KiwiRail seeks amendment to this rule to ensure it applies to rail infrastructure. It is essential that rail activities are captured and provided for in the plan and the rules as proposed, fail to specifically provide for rail infrastructure activities. KiwiRail seeks permitted activity status for the installation, extension, operation, upgrade, maintenance and repair, or removal of rail infrastructure and ancillary vehicle access tracks, subject to standards.	Amend as follows: INF - R7 Installation, extension, maintenance, operation, upgrade and repair of rail infrastructure , lines, underground pipelines and ancillary vehicle access tracks erected by a Network Utility Operator. [...]
Radio New Zealand (S476)	S476.023	Infrastructure	INF - R7	Support		RNZ supports a permitted activity status for works to lines, etc. by Network Utility Operators.
Buller District Council (S538)	S538.048	Infrastructure	INF - R7	Support in part	Rule 7 is supported but the rule heading is long and could be simplified for ease of reference. If amended as suggested, this will then flow into the following rules which have concise headings dealing with new network utilities.	Amend the heading for Rule 7 as follows: Installation, extension, maintenance, operation, upgrade and repair of lines, underground pipelines and ancillary vehicle access tracks erected by a Network Utility Operator. Operation, maintenance, repairs and extension of existing network utilities.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Chris & Jan Coll (S558)	S558.538	Infrastructure	INF - R7	Support		Retain
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.148	Infrastructure	INF - R7	Amend	The permitted activities do not protect natural values.	Include standard that this must also meet the permitted standards of the ECO, ONFL, CE, EW, and NC chapters.
Chris J Coll Surveying Limited (S566)	S566.538	Infrastructure	INF - R7	Support		Retain
William McLaughlin (S567)	S567.058	Infrastructure	INF - R7	Support		Retain
Laura Coll McLaughlin (S574)	S574.538	Infrastructure	INF - R7	Support		Retain
Grey District Council (S608)	S608.515	Infrastructure	INF - R7	Support in part	<p>The definition of Relocation in point 3. is as follows: "means, in relation to historic heritage items, moving an item to a new area or site." This needs to be altered to refer to INF - R7 which is the provision for the "Installation, extension, maintenance, operation, upgrade and repair of lines, underground pipelines and ancillary vehicle access tracks erected by a Network Utility Operator". It is unclear from the definition of Relocation how it refers to the provisions of this permitted activity standard. Provision 7. of INF - R7 refers to the pi pole structure provided for in provision 4., however provision 5. is the provision for pi poles. Recommend provision 7. is altered to refer to provision 5.</p>	<p>Alter the definition of Relocation to refer to the provisions of this permitted activity standard as follows: "means, in relation to historic heritage items, moving an item to a new area or site." Alter provision 7. as follows: "The building footprint or the footprint of the structure does not increase by more than 30 percent of the existing building or structure, excluding any pole or pi pole structure provided for in 45 above;"</p>
Chorus NZ Ltd, Spark NZ Trading Ltd, Vodafone NZ Ltd (S663)	S663.022	Infrastructure	INF - R7	Support	The standards in the rule are considered to be workable for telecommunications infrastructure.	Retain provision as notified

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.092	Infrastructure	INF - R8	Support	We support this rule.	Retain rule.
Buller District Council (S538)	S538.049	Infrastructure	INF - R8	Support in part	<p>While Rule 8 applies to New Network Utility Customer Connections, the performance standards suggest that it is directed at electricity connections. Given energy activities are managed in the Energy Chapter, there is potential for the rule to be missed by plan users who may assume that customer connections for electricity services would be dealt with in the Energy Chapter.</p> <p>Council's submission on Rule HH-R5 is that connections to heritage items should be permitted activities. As a consequence, Council seeks the removal of the Advice Note.</p>	<p>Remove the Advice Note.</p> <p>Insert a reference in the Energy Chapter that directs plan users to Rule 8 when considering customer connections for electricity services.</p>
Chris & Jan Coll (S558)	S558.549	Infrastructure	INF - R8	Support		Retain
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.149	Infrastructure	INF - R8	Amend	The permitted activities do not protect natural values.	Include standard that this must also meet the permitted standards of the ECO, ONFL, CE, EW, and NC chapters.
Chris J Coll Surveying Limited (S566)	S566.549	Infrastructure	INF - R8	Support		Retain
William McLaughlin (S567)	S567.059	Infrastructure	INF - R8	Support		Retain
Laura Coll McLaughlin (S574)	S574.549	Infrastructure	INF - R8	Support		Retain
Chorus NZ Ltd, Spark NZ Trading	S663.024	Infrastructure	INF - R8	Support	The rule appropriately provides for customer connections	Retain provision as notified

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Ltd, Vodafone NZ Ltd (S663)						
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.093	Infrastructure	INF - R9	Support	We support this rule.	Retain rule.
Buller District Council (S538)	S538.050	Infrastructure	INF - R9	Oppose	Rule 9 appears to encompass both electricity lines and telecommunication poles or towers. As energy activities are managed in the Energy Chapter and telecommunication facilities are managed by INF-R12 this rule appears out of context. Council suggests that the electricity component of the rule is moved to the Energy Chapter and the reference to telecommunication is removed.	Remove Rule 9 and insert into the Energy Chapter.
Frida Inta (S553)	S553.043	Infrastructure	INF - R9	Amend	Would allow a cellphone tower to be built without resource consent.	Change to discretionary activity
Chris & Jan Coll (S558)	S558.560	Infrastructure	INF - R9	Support		REtain
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.150	Infrastructure	INF - R9	Amend	The permitted activities do not protect natural values.	Include standard that this must also meet the permitted standards of the ECO, ONFL, CE, EW, and NC chapters.
Chris J Coll Surveying Limited (S566)	S566.560	Infrastructure	INF - R9	Support		REtain
William McLaughlin (S567)	S567.060	Infrastructure	INF - R9	Support		REtain
Laura Coll McLaughlin (S574)	S574.560	Infrastructure	INF - R9	Support		REtain
Chorus NZ Ltd, Spark NZ Trading Ltd, Vodafone NZ Ltd (S663)	S663.025	Infrastructure	INF - R9	Support	The rule appropriately provides for overhead lines in rural and industrial zones	Retain provision as notified

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.094	Infrastructure	INF - R10	Support	We support this rule.	Retain rule.
Buller District Council (S538)	S538.051	Infrastructure	INF - R10	Support	While Rule 10 is supported, Council considers it would be helpful to provide a definition of 'Telecommunication kiosk' to clarify what the rule applies to.	Insert a definition for 'Telecommunication Kiosk'.
Chris & Jan Coll (S558)	S558.571	Infrastructure	INF - R10	Support		Retain
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.151	Infrastructure	INF - R10	Amend	The permitted activities do not protect natural values.	Include standard that this must also meet the permitted standards of the ECO, ONFL, CE, EW, and NC chapters.
Chris J Coll Surveying Limited (S566)	S566.571	Infrastructure	INF - R10	Support		Retain
William McLaughlin (S567)	S567.061	Infrastructure	INF - R10	Support		Retain
Laura Coll McLaughlin (S574)	S574.571	Infrastructure	INF - R10	Support		Retain
Chorus NZ Ltd, Spark NZ Trading Ltd, Vodafone NZ Ltd (S663)	S663.026	Infrastructure	INF - R10	Support	The rule appropriately provides for telecommunications kiosks	Retain provision as notified
Chorus NZ Ltd, Spark NZ Trading Ltd, Vodafone NZ Ltd (S663)	S663.028	Infrastructure	INF - R10	Support	The rule appropriately provides for telecommunications kiosks	Retain provision as notified
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.095	Infrastructure	INF - R11	Support	We support this rule.	Retain rule.
Buller District Council (S538)	S538.052	Infrastructure	INF - R11	Support	While Rule 11 is supported, Council considers it would be helpful to provide a	Insert a definition for 'Small Cell Utility'.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					definition of 'Small Cell Utility' to clarify what the rule applies to.	
Chris & Jan Coll (S558)	S558.582	Infrastructure	INF - R11	Support		Retain
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.152	Infrastructure	INF - R11	Amend	The permitted activities do not protect natural values.	Include standard that this must also meet the permitted standards of the ECO, ONFL, CE, EW, and NC chapters.
Chris J Coll Surveying Limited (S566)	S566.582	Infrastructure	INF - R11	Support		Retain
William McLaughlin (S567)	S567.062	Infrastructure	INF - R11	Support		Retain
Laura Coll McLaughlin (S574)	S574.582	Infrastructure	INF - R11	Support		Retain
Grey District Council (S608)	S608.516	Infrastructure	INF - R11	Support in part	Include definition of Small Cell Utility.	Include definition of Small Cell Utility.
Chorus NZ Ltd, Spark NZ Trading Ltd, Vodafone NZ Ltd (S663)	S663.027	Infrastructure	INF - R11	Amend	This rule provides for New Small Cell Utility as a permitted activity. However, as this term is undefined it is unclear what activity is provided for. The NESTF provides for small cell units as a permitted activity. However, these are subject to a defined envelope. Rule INF-R11 should adopt the same envelope to provide clarity on what is provided for in the rule.	Amend Rule INF-R11 as follows: Activity Status Permitted Where: 1. This meets the performance standards in Rule INF - R1; and 2. the volume (including any ancillary equipment, but not including any cabling) is not more than 0.11m3."
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.096	Infrastructure	INF - R12	Support	We support this rule.	Retain rule.
Buller District Council (S538)	S538.053	Infrastructure	INF - R12	Support	While Rule 12 is generally supported, Council is concerned with the level of detailed performance standards and requests consideration be given to whether there is an alternative way of	Give consideration to presenting the performance standards in a different format.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					presenting the requirements which would be more readily absorbed by plan users. Council is also concerned that some of the terms used are not defined, for example 'omni directional whip'.	Define 'omni directional whip'.
Chris & Jan Coll (S558)	S558.593	Infrastructure	INF - R12	Support	This rule needs to be more enabling and clearer.	Amend to be more enabling and provide clarity.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.153	Infrastructure	INF - R12	Amend	The permitted activities do not protect natural values.	Include standard that this must also meet the permitted standards of the ECO, ONFL, CE, EW, and NC chapters.
Chris J Coll Surveying Limited (S566)	S566.593	Infrastructure	INF - R12	Support	This rule needs to be more enabling and clearer.	Amend to be more enabling and provide clarity.
William McLaughlin (S567)	S567.063	Infrastructure	INF - R12	Support	This rule needs to be more enabling and clearer.	Amend to be more enabling and provide clarity.
Laura Coll McLaughlin (S574)	S574.593	Infrastructure	INF - R12	Support	This rule needs to be more enabling and clearer.	Amend to be more enabling and provide clarity.
Grey District Council (S608)	S608.517	Infrastructure	INF - R12	Support in part	Include definition of Land Transport Corridor. The definition of height refers to a specified reference point which is not clear as to what it is. It is requested that this be made clear in the definition, i.e. existing ground level.	Include definition of Land Transport Corridor. Alter the definition of Height to include the specified reference point, i.e.: "means the vertical distance between existing ground level a specified reference point and the highest part of any feature, structure or building above that point."
Chorus NZ Ltd, Spark NZ Trading Ltd, Vodafone NZ Ltd (S663)	S663.029	Infrastructure	INF - R12	Amend	This rule covers equipment not regulated by the NESTF. It needs to be extended to also cover equipment that is regulated but does not meet the permitted standards of the NESTF. Otherwise there will be a rule gap for considering this situation as regulated equipment not	Amend Rule INF R12 as follows: New telecommunications poles, new antenna attached to poles and new antenna attached to a building not regulated by the NES - TF, or regulated equipment not meeting the permitted standards of the NES-TF

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					<p>meeting the NESTF permitted standards then to be assessed under the District Plan.</p> <p>Further to provide more consistency with the standards being sought for similar zones in other district plans to better reflect the ability for these zones to absorb the effects of infrastructure, a 20m height limit is sought for commercial zones other than the Neighbourhood Centre Zone, and 25m for Industrial Zones.</p>	<p>1. This is located within a land transport corridor; and</p> <p>i. The combined height of the pole and antenna does not exceed:</p> <p>a. 15m in a RESZ - Residential Zone, SETZ - Settlement Zone or NCZ Neighbourhood Centre Zone CMUZ – Commercial and Mixed Use Zone;</p> <p>b. 20m in a CMUZ - Commercial and Mixed Use Zone other than the NCZ Neighbourhood Centre Zone or an INZ - Industrial Zone; or</p> <p>c. 35m in all other zones.</p> <p>2. This is located outside a land transport corridor:</p> <p>i. The combined height (network utility) of a telecommunications pole and antenna does not exceed:</p> <p>a. 15m in a RESZ - Residential Zone, NCZ Neighbourhood Centre Zone CMUZ – Commercial and Mixed Use Zone or SETZ - Settlement Zone;</p> <p>b. 20m in a CMUZ - Commercial and Mixed Use Zone other than the NCZ Neighbourhood Centre Zone an INZ - Industrial Zone;</p> <p>c. 25m in all other locations, or 30m where there are two or more users of the same pole.</p>
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.097	Infrastructure	INF - R13	Support	We support this rule.	Retain rule.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Buller District Council (S538)	S538.054	Infrastructure	INF - R13	Support	Rules 13 to 15 are supported.	Retain as notified.
Chris & Jan Coll (S558)	S558.604	Infrastructure	INF - R13	Support		Retain
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.154	Infrastructure	INF - R13	Amend	The controlled activities do not protect natural values.	Include requirement that this must also meet the permitted standards of the ECO, ONFL, CE, EW, and NC chapters.
Chris J Coll Surveying Limited (S566)	S566.604	Infrastructure	INF - R13	Support		Retain
William McLaughlin (S567)	S567.064	Infrastructure	INF - R13	Support		Retain
Laura Coll McLaughlin (S574)	S574.604	Infrastructure	INF - R13	Support		Retain
Grey District Council (S608)	S608.518	Infrastructure	INF - R13	Support in part	Remove provision 4. of INF - R13, as it refers to the requirements for dish antennae in zoned land (INF - R13 is specifically for road reserve). OR include a separate sub-provision under provision 4. for dish antennae in unzoned road reserve. Various grammatical errors.	Delete provision 4.4. A dish antenna does not exceed a diameter of: a. 0.6m in a RESZ – Residential Zone or SETZ – Settlement Zone; b. 0.9m in all other zones. Edit provisions to grammatically correct standard, i.e. "notional envelope is exceeded"
Chorus NZ Ltd, Spark NZ Trading Ltd, Vodafone NZ Ltd (S663)	S663.030	Infrastructure	INF - R13	Support	The additional allowance above the NESTF permitted standards as a controlled activity supports the efficient roll out of telecommunications infrastructure to communities	Retain provision as notified
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.098	Infrastructure	INF - R14	Support	We support this rule.	Retain rule.
Buller District Council (S538)	S538.055	Infrastructure	INF - R14	Support	Rules 13 to 15 are supported.	Retain as notified.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Chris & Jan Coll (S558)	S558.615	Infrastructure	INF - R14	Support		Retain
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.155	Infrastructure	INF - R14	Amend	The controlled activities do not protect natural values.	Include requirement that this must also meet the permitted standards of the ECO, ONFL, CE, EW, and NC chapters.
Chris J Coll Surveying Limited (S566)	S566.615	Infrastructure	INF - R14	Support		Retain
William McLaughlin (S567)	S567.065	Infrastructure	INF - R14	Support		Retain
Laura Coll McLaughlin (S574)	S574.615	Infrastructure	INF - R14	Support		Retain
Grey District Council (S608)	S608.519	Infrastructure	INF - R14	Support in part	Provision 2. refers to excluding panel antenna in a RESZ or SETZ zone. Clarity is required on what the requirements are in these two zones if they are excluded from this provision.	Specify the requirements for width of panel antenna in the RESZ or SETZ if the limit is not 0.8m.
Chorus NZ Ltd, Spark NZ Trading Ltd, Vodafone NZ Ltd (S663)	S663.031	Infrastructure	INF - R14	Support	The additional allowance above the NESTF permitted standards as a controlled activity supports the efficient roll out of telecommunications infrastructure to communities	Retain provision as notified
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.099	Infrastructure	INF - R15	Support	We support this rule.	Retain rule.
Buller District Council (S538)	S538.056	Infrastructure	INF - R15	Support	Rules 13 to 15 are supported.	Retain as notified.
Chris & Jan Coll (S558)	S558.626	Infrastructure	INF - R15	Support		Retain
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.156	Infrastructure	INF - R15	Amend	The controlled activities do not protect natural values.	Include requirement that this must also meet the permitted standards of the ECO, ONFL, CE, EW, and NC chapters.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Chris J Coll Surveying Limited (S566)	S566.626	Infrastructure	INF - R15	Support		Retain
William McLaughlin (S567)	S567.066	Infrastructure	INF - R15	Support		Retain
Laura Coll McLaughlin (S574)	S574.626	Infrastructure	INF - R15	Support		Retain
Chorus NZ Ltd, Spark NZ Trading Ltd, Vodafone NZ Ltd (S663)	S663.032	Infrastructure	INF - R15	Support	The additional allowance above the NESTF permitted standards as a controlled activity supports the efficient roll out of telecommunications infrastructure to communities	Retain provision as notified
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.100	Infrastructure	INF - R16	Support	We support this rule.	Retain rule.
Buller District Council (S538)	S538.057	Infrastructure	INF - R16	Oppose in part	<p>The heading for Rule 16 does not correctly represent what the rule applies to. Connections to reticulated stormwater and wastewater systems are permitted activities under Rule INF-R2 with Rule 16 to capture services that are provided on-site. A better description of what the rule seeks to manage would be 'Provision of Onsite water supply, wastewater and stormwater services'. Council considers that clause (a) could be expressed in terms relevant to installation of services rather than in terms of 'flood hazard mitigation'. Council seeks that stormwater and overland flow path implications are considered when services are installed.</p> <p>Clause (b) does not appear relevant as it refers to discharges to reticulated systems.</p>	<p>Amend Rule 16 as follows: Connections to wastewater, stormwater and reticulated systems not meeting Permitted Activity Standards Provision of On-site Water Supply, Wastewater and Stormwater Services a. Level of flood hazard mitigation through stormwater control Stormwater and overland flow path implications from water supplies, stormwater and/or wastewater controls; b. Any requirement for pre-treatment, retention or detention of stormwater or wastewater prior to discharge to the reticulated system; c. Provision of drinking water connections in accordance with NZS 4404: Code of Practice for Land Development and Subdivision Infrastructure and or the relevant Council Engineering Standards; d. Provision of wastewater connections in accordance with NZS 4404: Code of Practice</p>

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					Clause (c) and (d) refer to NZS4404. Council is reviewing the use of this standard. Council seeks that the performance standards recognise that Council may adopt a subsequent engineering standard	for Land Development and Subdivision Infrastructure and or the relevant Council engineering Standards.
Chris & Jan Coll (S558)	S558.637	Infrastructure	INF - R16	Support	We support this rule in principle.	Retain
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.157	Infrastructure	INF - R16	Amend	The matters of discretion need to allow for consideration of natural values.	Amend the matters of discretion in each rule to include: - adverse effects on natural values, including those not yet identified on overlays, and the requirement to manage those effects in accordance with the Natural Environment and District Wide chapters of this Plan.
Chris J Coll Surveying Limited (S566)	S566.637	Infrastructure	INF - R16	Support	We support this rule in principle.	Retain
William McLaughlin (S567)	S567.067	Infrastructure	INF - R16	Support	We support this rule in principle.	Retain
Laura Coll McLaughlin (S574)	S574.637	Infrastructure	INF - R16	Support	We support this rule in principle.	Retain
Grey District Council (S608)	S608.520	Infrastructure	INF - R16	Support in part	The definition of wastewater should allow for the separate substances of greywater and blackwater to be considered as wastewater.	Alter the definition of wastewater to allow for it to include the substance of greywater or blackwater as follows: "means any combination of two one or more of the following wastes: sewage, greywater or industrial and trade waste."
Toka Tū Ake EQC (S612)	S612.013	Infrastructure	INF - R16	Support	Support the councils' consideration of flood hazard management	No change
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.101	Infrastructure	INF - R17	Support	We support this rule.	Retain rule.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Buller District Council (S538)	S538.058	Infrastructure	INF - R17	Support in part	As mentioned above, if there are no existing gas pipelines in the region this rule should be removed.	If Rule 17 is not relevant to the region, delete.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.158	Infrastructure	INF - R17	Amend	The matters of discretion need to allow for consideration of natural values.	Amend the matters of discretion in each rule to include: - adverse effects on natural values, including those not yet identified on overlays, and the requirement to manage those effects in accordance with the Natural Environment and District Wide chapters of this Plan.
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.102	Infrastructure	INF - R18	Support	We support this rule.	Retain rule.
Buller District Council (S538)	S538.059	Infrastructure	INF - R18	Oppose	Council seeks to have navigational aids and beacons as permitted activities, while lighthouses will be located within the Coastal Environment and managed accordingly. Council requests that Rule 18 is removed.	Delete Rule 18.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.159	Infrastructure	INF - R18	Amend	The matters of discretion need to allow for consideration of natural values.	Amend the matters of discretion in each rule to include: - adverse effects on natural values, including those not yet identified on overlays, and the requirement to manage those effects in accordance with the Natural Environment and District Wide chapters of this Plan.
Grey District Council (S608)	S608.624	Infrastructure	INF - R18	Support	Insert new provision for Lighthouses, navigational aids and beacons as a permitted activity standard.	Insert new permitted activity standard for the installation of Lighthouses, navigational aids and beacons: INF - R13 New lighthouses, navigational aids and beacons Activity Status Permitted Where:1. This meets the performance standards in Rule INF -

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						R1.Activity status where compliance not achieved: Restricted Discretionary.
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.103	Infrastructure	INF - R19	Support	We support this rule.	Retain rule.
Buller District Council (S538)	S538.060	Infrastructure	INF - R19	Oppose	Council seeks to have environmental, extreme weather event monitoring and meteorological facilities as permitted activities with no performance standards, therefore it is requested that Rules 19 and 20 are removed.	Delete Rules 19 and 20.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.160	Infrastructure	INF - R19	Amend	The matters of discretion need to allow for consideration of natural values.	Amend the matters of discretion in each rule to include: - adverse effects on natural values, including those not yet identified on overlays, and the requirement to manage those effects in accordance with the Natural Environment and District Wide chapters of this Plan.
Toka Tū Ake EQC (S612)	S612.014	Infrastructure	INF - R19	Support	Support the councils' consideration of resilience to natural hazards and climate change	No change
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.104	Infrastructure	INF - R20	Support	We support this rule.	Retain rule.
Buller District Council (S538)	S538.061	Infrastructure	INF - R20	Oppose	Council seeks to have environmental, extreme weather event monitoring and meteorological facilities as permitted activities with no performance standards, therefore it is requested that Rules 19 and 20 are removed.	Delete Rules 19 and 20.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.161	Infrastructure	INF - R20	Amend	The matters of discretion need to allow for consideration of natural values.	Amend the matters of discretion in each rule to include: - adverse effects on natural values, including those not yet identified on overlays, and the requirement to manage those effects in accordance with the Natural Environment and District Wide chapters of this Plan.
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.105	Infrastructure	INF - R21	Support	We support this rule.	Retain rule.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.162	Infrastructure	INF - R21	Amend	The matters of discretion need to allow for consideration of natural values.	Amend the matters of discretion in each rule to include: - adverse effects on natural values, including those not yet identified on overlays, and the requirement to manage those effects in accordance with the Natural Environment and District Wide chapters of this Plan.
Grey District Council (S608)	S608.521	Infrastructure	INF - R21	Support	Alter the definition of wastewater to allow for the separate substances of greywater and blackwater to be considered as wastewater. Comment: the definition of land here refers to land that is covered by water and the airspace above land. Recommend that this is altered to clarify that this is only for land not covered by water or in the air above land as this provision is for the disposal of treated effluent to land, not water or air.	Alter the definition of wastewater to allow for it to include the substance of greywater or blackwater as follows: "means any combination of two one or more of the following wastes: sewage, greywater or industrial and trade waste." Alter the definition of land
Toka Tū Ake EQC (S612)	S612.015	Infrastructure	INF - R21	Support	Support the councils' consideration of natural hazards	No change
Te Runanga o Ngai Tahu, Te Runanga	S620.095	Infrastructure	INF - R21	Support	The requirement for a land based effluent/disposal system is supported.	Retain as notified

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
o Ngati Waewae, Te Runanga o Makaawhio (S620)						
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.106	Infrastructure	INF - R22	Support	We support this rule.	Retain rule.
Buller District Council (S538)	S538.062	Infrastructure	INF - R22	Support	Rules 22, 23 and 25 to 28 are supported.	Retain as notified.
Chris & Jan Coll (S558)	S558.648	Infrastructure	INF - R22	Support		Retain
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.163	Infrastructure	INF - R22	Amend	The matters of discretion need to allow for consideration of natural values.	Amend the matters of discretion in each rule to include: - adverse effects on natural values, including those not yet identified on overlays, and the requirement to manage those effects in accordance with the Natural Environment and District Wide chapters of this Plan.
Chris J Coll Surveying Limited (S566)	S566.648	Infrastructure	INF - R22	Support		Retain
William McLaughlin (S567)	S567.068	Infrastructure	INF - R22	Support		Retain
Laura Coll McLaughlin (S574)	S574.648	Infrastructure	INF - R22	Support		Retain
Chorus NZ Ltd, Spark NZ Trading Ltd, Vodafone NZ Ltd (S663)	S663.033	Infrastructure	INF - R22	Support	Restricted Discretionary status is considered reasonable for assessing telecommunications kiosks not meeting permitted activity standards. Relevant matters have been included in the matters of discretion	Retain provision as notified
Te Mana Ora (Community and Public Health) of the	S190.107	Infrastructure	INF - R23	Support	We support this rule.	Retain rule.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
NPHS/ Te Whatu Ora (S190)						
Buller District Council (S538)	S538.063	Infrastructure	INF - R23	Support	Rules 22, 23 and 25 to 28 are supported.	Retain as notified.
Chris & Jan Coll (S558)	S558.659	Infrastructure	INF - R23	Support		Retain
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.164	Infrastructure	INF - R23	Amend	The matters of discretion need to allow for consideration of natural values.	Amend the matters of discretion in each rule to include: - adverse effects on natural values, including those not yet identified on overlays, and the requirement to manage those effects in accordance with the Natural Environment and District Wide chapters of this Plan.
Chris J Coll Surveying Limited (S566)	S566.659	Infrastructure	INF - R23	Support		Retain
William McLaughlin (S567)	S567.069	Infrastructure	INF - R23	Support		Retain
Laura Coll McLaughlin (S574)	S574.659	Infrastructure	INF - R23	Support		Retain
Chorus NZ Ltd, Spark NZ Trading Ltd, Vodafone NZ Ltd (S663)	S663.034	Infrastructure	INF - R23	Support	The matters to which discretion are restricted sets out an appropriate framework for considering restricted discretionary activity applications for telecommunications equipment.	Retain provision as notified
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.108	Infrastructure	INF - R24	Support	We support this rule.	Retain rule.
Chris & Jan Coll (S558)	S558.670	Infrastructure	INF - R24	Support		Retain
Royal Forest and Bird Protection Society of New	S560.165	Infrastructure	INF - R24	Support		Retain

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Zealand Inc. (Forest & Bird) (S560)						
Chris J Coll Surveying Limited (S566)	S566.670	Infrastructure	INF - R24	Support		Retain
William McLaughlin (S567)	S567.070	Infrastructure	INF - R24	Support		Retain
Laura Coll McLaughlin (S574)	S574.670	Infrastructure	INF - R24	Support		Retain
Grey District Council (S608)	S608.522	Infrastructure	INF - R24	Support in part	<p>Alter the definition of wastewater to allow for the separate substances of greywater and blackwater to be considered as wastewater.</p> <p>Alter the definition of Water to include the water within the Water Treatment Plant, as the definition excludes water in any form while in any pipe, tank or cistern.</p> <p>OR</p> <p>Remove the hyperlink of Water from the Water Treatment Plant for clarity.</p>	<p>Alter the definition of wastewater to allow for it to include the substance of greywater or blackwater as follows: "means any combination of two one or more of the following wastes: sewage, greywater or industrial and trade waste."</p> <p>Alter the definition of Water to include the water within the Water Treatment Plant, as the definition excludes water in any form while in any pipe, tank or cistern.</p> <p>OR</p> <p>Remove the hyperlink of Water from the Water Treatment Plant for clarity.</p>
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.096	Infrastructure	INF - R24	Amend	It is culturally offensive to discharge wastewater to water and would be fit within the provision of this chapter.	Amend the rule as follows : Activity Status Discretionary where the discharge of wastewater is to land and insert a new non-complying rule for those systems that discharge wastewater to water
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.109	Infrastructure	INF - R25	Support	We support this rule.	Retain rule.
Buller District Council (S538)	S538.064	Infrastructure	INF - R25	Support	Rules 22, 23 and 25 to 28 are supported.	Retain as notified.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Chris & Jan Coll (S558)	S558.681	Infrastructure	INF - R25	Support		Retain
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.166	Infrastructure	INF - R25	Support		Retain
Chris J Coll Surveying Limited (S566)	S566.681	Infrastructure	INF - R25	Support		Retain
William McLaughlin (S567)	S567.071	Infrastructure	INF - R25	Support		Retain
Laura Coll McLaughlin (S574)	S574.681	Infrastructure	INF - R25	Support		Retain
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.110	Infrastructure	INF - R26	Support	We support this rule.	Retain rule.
KiwiRail Holdings Limited (S442)	S442.031	Infrastructure	INF - R26	Amend	KiwiRail seeks amendment to this rule to ensure it applies to aboveground infrastructure such as rail.	Amend as follows: INF-R26 Installation, extension, maintenance, operation, minor upgrade and repair of rail infrastructure , lines, poles and towers erected by a Network Utility Operator not meeting Permitted Activity standards.
Radio New Zealand (S476)	S476.024	Infrastructure	INF - R26	Support		RNZ supports this rule.
Buller District Council (S538)	S538.065	Infrastructure	INF - R26	Support	Rules 22, 23 and 25 to 28 are supported.	Retain as notified.
Chris & Jan Coll (S558)	S558.692	Infrastructure	INF - R26	Support		Retain
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.167	Infrastructure	INF - R26	Support		Retain

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Chris J Coll Surveying Limited (S566)	S566.692	Infrastructure	INF - R26	Support		Retain
William McLaughlin (S567)	S567.072	Infrastructure	INF - R26	Support		Retain
Laura Coll McLaughlin (S574)	S574.692	Infrastructure	INF - R26	Support		Retain
Grey District Council (S608)	S608.523	Infrastructure	INF - R26	Support in part	Remove reference to "minor upgrade" from provision, as there is no other allowance for the upgrade of these structures.	Alter provision to the following: "Installation, extension, maintenance, operation, minor upgrade and repair of lines, poles and towers erected by a Network Utility Operator not meeting Permitted Activity standards"
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.111	Infrastructure	INF - R27	Support	We support this rule.	Retain rule.
Radio New Zealand (S476)	S476.025	Infrastructure	INF - R27	Support		RNZ support discretionary activity status for temporary network activities where permitted activity standards are not met.
Buller District Council (S538)	S538.066	Infrastructure	INF - R27	Support	Rules 22, 23 and 25 to 28 are supported.	Retain as notified.
Chris & Jan Coll (S558)	S558.703	Infrastructure	INF - R27	Support		Retain
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.168	Infrastructure	INF - R27	Support		Retain
Chris J Coll Surveying Limited (S566)	S566.703	Infrastructure	INF - R27	Support		Retain
William McLaughlin (S567)	S567.073	Infrastructure	INF - R27	Support		Retain

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Laura Coll McLaughlin (S574)	S574.703	Infrastructure	INF - R27	Support		Retain
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.112	Infrastructure	INF - R28	Support	We support this rule.	Retain rule.
Radio New Zealand (S476)	S476.026	Infrastructure	INF - R28	Support		RNZ support non-complying activity status for infrastructure that does not comply with permitted activity standards. RNZ already complies with standards that relate to Radio Frequency Fields and support their inclusion in the Proposed Plan.
Buller District Council (S538)	S538.067	Infrastructure	INF - R28	Support	Rules 22, 23 and 25 to 28 are supported.	Retain as notified.
Chris & Jan Coll (S558)	S558.714	Infrastructure	INF - R28	Support		Retain
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.169	Infrastructure	INF - R28	Support		Retain
Chris J Coll Surveying Limited (S566)	S566.714	Infrastructure	INF - R28	Support		Retain
William McLaughlin (S567)	S567.074	Infrastructure	INF - R28	Support		Retain
Laura Coll McLaughlin (S574)	S574.714	Infrastructure	INF - R28	Support		Retain
KiwiRail Holdings Limited (S442)	S442.041	Transport	TRN	Amend	The advice note advising plan users of the need to get approval from KiwiRail where any crossing will intersect with the rail corridor is supported.	Retain as proposed
Waka Kotahi NZ Transport Agency (S450)	S450.048	Transport	TRN	Amend	It is recommended that a new policy be included that reflects the high trip generating standards, so that they are	Include new policy: TRN-PX High Trip Generating Activities Transport Assessment requirements: 1. Whether the

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					appropriately considered within the chapter. Include TRN-S14 as a policy.	provision of access and on-site manoeuvring areas associated with the activity, including vehicle loading and servicing deliveries, affects the safety, efficiency, accessibility (including for people whose mobility is restricted) of the site, and the land transport network. 2. Whether the design and layout of the proposed activity maximises opportunities for travel other than private cars, including by providing safe and convenient access for travel using more active modes. 3. Having regard to the level of additional traffic generated by the activity and whether measures are proposed to adequately mitigate the actual or potential effects from the anticipated trip generation (for all transport modes) from the proposed activity, including consideration of cumulative effects with other activities in the vicinity, proposed infrastructure and construction work associated with the activity. 4. Whether there are any effects from the anticipated trip generation and how they are to be mitigated where activities will generate more than 250hvm/d.
Waka Kotahi NZ Transport Agency (S450)	S450.060	Transport	TRN	Amend	Waka Kotahi recommends that a new rule be included in the Transport chapter to require resource consent for any new activity or change in land use where the activity will have direct access onto the state highway network. It is recommended that the activity be a Restricted Discretionary activity with the safe and efficient operation of the state highway network and traffic effects as matters of discretion.	Insert rule into plan.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.171	Transport	TRN	Oppose in part	See Key Issue above for submission points.	Where this chapters refers to biodiversity effects rather than including a different standard of effects management (e.g., 'minimising'), a specific requirement should be included to give effect to the ECO chapter provisions.
Westland District Council (S181)	S181.003	Transport	Transport	Support	Westland District Council supports these Objectives, Policies and Rules	Retain the Objectives, Policies and Rules
KiwiRail Holdings Limited (S442)	S442.014	Transport	Transport	Amend	KiwiRail seeks the inclusion of a definition of Transport Network. This term is used within the Transport Chapter and for clarity, KiwiRail seeks a definition which includes the rail network.	Include the following definition in the proposed plan: Transport Network means all rail, public roads, public pedestrian, cycle and micro-mobility facilities, public transport and associated infrastructure.
Suzanne Hills (S443)	S443.016	Transport	Transport	Amend	As there is no strategic objective on emission reduction, this imperative does not come through strongly in this section. A significant proportion of NZ emissions are due to transport and this needs more consideration. There could be much bolder objectives & policies enabling/supporting active transport and reducing vehicle movements. Refer submission for examples.	Review this section to enable a significant reduction in regional transport emissions.
Foodstuffs (South Island) Properties Limited and Foodstuffs South Island Limited (S464)	S464.005	Transport	Transport	Amend	Provisions in the Transport Chapter have a heavy emphasis on amenity factors, which is inappropriate and has the potential to stifle the efficient and effective use and operation of the transport network	Remove the emphasis n amenity within the transport chapter.
Rocky Mining Limited (S474)	S474.030	Transport	Transport	Amend		Seek recognition of the importance of efficient and effective use and operation of the transport network;
Papahaua Resources Limited (S500)	S500.019	Transport	Transport	Support		Seek recognition of the importance of efficient and effective use and operation of the transport network;

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Papahaua Resources Limited (S500)	S500.020	Transport	Transport	Amend		remove from the rules any assessment of amenity effects caused by use of the transport network
Fire and Emergency New Zealand (S573)	S573.009	Transport	Transport	Support	<p>For fire appliances to access an emergency, it is important that the transportation network is designed, constructed, and operated in a way that ensures a safe, efficient, effective, integrated, resilient and sustainable transport system.</p> <p>Fire and Emergency recognises the significant advantages of prioritisation of street space for pedestrians and cyclists in urban environments. However, in prioritising street space for pedestrians and cyclists, care must be given to avoid unintended consequences on Fire and Emergency's ability to respond to emergency events. Prior engagement with Fire an Emergency and other emergency service providers is therefore important before such measures are implemented.</p> <p>In some cases, the provision of cycleways on main arterial roads, the narrowing of roads or incorporation of speed controls as part of traffic-calming programmes may inadvertently block or significantly slow down a route required by Fire and Emergency. If an emergency appliance needs to park on a road, this can mean the street/road is blocked to all other traffic including other emergency vehicles that may need to get past. This is not only limited to residential streets, but also more commercial and central city areas.</p> <p>Street furniture, trees and sculptures etc. can also make it difficult for fire</p>	No amendment sought

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					<p>appliances to get close to building frontages and consequently fire hydrants in the streets. In the case of larger buildings, the street frontage is often where the fire alarm control panel is located. This component should be considered during the update on any urban design guidelines.</p> <p>Fire and Emergency support a robust policy framework that will see that consideration is given to the operational needs of emergency services in a fire or other emergency.</p>	
Heritage New Zealand Pouhere Taonga (S140)	S140.012	Transport	Overview	Amend	<p>HNZPT supports the clarification contained in the overview stating, 'Where a transport activity is located within an overlay area (as identified in the planning maps) then the relevant overlay provisions apply'.</p> <p>However, we note that the listed Overlay Chapters do not include Historic Heritage.</p> <p>We request additional wording be added as per the overview in the infrastructure chapter (point 011 above).</p>	HNZPT requests the wording be amended: 'Overlay Chapters - the Overlay Chapters have provisions in relation to Sites and Areas of Significance to Māori; Ecosystems and Indigenous Biodiversity; Natural Features and Landscape; Natural Character and Margins of Waterbodies; Natural Hazards; Historic Heritage and the Coastal Environment. Where a transport activity is located within an overlay area (as identified in the planning maps) then the relevant overlay provisions apply'.
Karen Lippiatt (S439)	S439.013	Transport	Overview	Amend	<p>Generally support. More emphasis required on active transport of all variations e.g. walking, cycling, scooting, wheelchair, riding</p> <p>Active transport is better located off road on a separate route from motorized transport. Shared paths are a good start, but as active transport modes become more popular, council must make provision for the future separation of active modes in high use locations. In places where volume and speed of the different active modes determine,</p>	Amend Overview as follows: The West Coast/Te Tai o Poutini has an extensive road and rail network with a growing number of active transport routes (shared pathways).

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					separate walking and cycling routes must be provided.	
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.466	Transport	Overview	Amend	The scope and relationship of the chapter to other chapters is somewhat unclear.	Delete: The Transport Chapter contains all the objectives, policies, and rules for managing the land transport corridors and the works and activities that occur within them.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.467	Transport	Overview	Amend	effects on indigenous biodiversity need to be considered for transport activities.	Ensure that the ECO, NFL, NC, and CE chapters are recognized as also applying to all activities addressed in provisions of the Transport chapter, and that the provisions of this chapter make clear that effects on biodiversity, natural character, landscapes and the coastal environment are to be managed in accordance with those chapters.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.468	Transport	Overview	Support		Clarify the relationship between Transport provisions in this chapter and zone chapter provisions.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.469	Transport	Overview	Amend	The scope and relationship of the chapter to other chapters is somewhat unclear.	Clarify the scope of the chapter with respect to infrastructure and network utilities.
Grey District Council (S608)	S608.009	Transport	Overview	Amend	SASM reference is removed	Remove reference to "Site or Area of Significance to Māori"
Grey District Council (S608)	S608.537	Transport	Overview	Support	While the identification of potentially multiple relevant rules to an activity is important, the wording implies that all rules must be complied with rather than the most applicable rule. Having a PA rule that cannot be met due to the general rule conditions makes little sense.	Clarification on how this wording corresponds to standard best practice in the planning sector. This is found in all the intro sections for each chapter and the same query applies.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
TiGa Minerals and Metals Limited (S493)	S493.025	Transport	Transport Objectives	Amend	To give effect to the West Coast Regional Policy Statement.	Include two new objectives in the Transport objectives as follows: 1. To provide for the safe, effective and efficient operation and use of land transport infrastructure to enable the movement of goods and people across the region. 2. Land transport corridors and land transport infrastructure are protected from incompatible land use activities and subdivision development, where these are defined as critical infrastructure.
Buller District Council (S538)	S538.068	Transport	Transport Objectives	Support in part	<p>Council generally supports the objectives and policies for Transport with one minor exception.</p> <p>The overview statement advises that the Transport Performance Standards uses the One Network Roding Classification System, however it is understood that there is a move away from this towards the One Network Framework. Council seeks that an additional clause is added to Policy 1 that requires recognition of a roads classification when considering proposals that impact the road transport network and that road classification may change over time.</p>	<p>Amend Policy 1 as follows:</p> <p>The road and rail transport networks shall: Be maintained or enhanced to provide safe and efficient transportation; Consider the needs of all transport users and modes of transport; and Minimise effects on adjoining properties including the impacts of vibration, noise and glare; and Recognise the different functions and design requirements for each road classification under the most current National Transport Network classification system.</p> <p>While Council has not sought inclusion of a Road Hierarchy information into the Transport Performance Standards, consideration should be given to whether this would be a helpful addition.</p>
Chris & Jan Coll (S558)	S558.718	Transport	Transport Objectives	Support		Retain
Geoff Volckman (S563)	S563.005	Transport	Transport Objectives	Support		Retain

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Catherine Smart-Simpson (S564)	S564.008	Transport	Transport Objectives	Support	Support the objectives	Retain as notified
Chris J Coll Surveying Limited (S566)	S566.718	Transport	Transport Objectives	Support		Retain
William McLaughlin (S567)	S567.075	Transport	Transport Objectives	Support		Retain
Laura Coll McLaughlin (S574)	S574.718	Transport	Transport Objectives	Support		Retain
Koiterangi Lime Co LTD (S577)	S577.008	Transport	Transport Objectives	Support	support these objectives.	Retain
WMS Group (HQ) Limited and WMS Land Co. Limited (S599)	S599.029	Transport	Transport Objectives	Amend	Additional objectives are sought which seek to enable the efficient and effective operation of the transport network	Include two new objectives in the Transport objectives as follows: 1. To provide for the safe, effective and efficient operation and use of land transport infrastructure to enable the movement of goods and people across the region.2. Land transport corridors and land transport infrastructure are protected from incompatible land use activities and subdivision development, where these are defined as critical infrastructure.
Birchfield Coal Mines Ltd (S601)	S601.023	Transport	Transport Objectives	Amend	To give effect to the West Coast Regional Policy Statement (RPS)	Add new objectives 1. To provide for the safe, effective and efficient operation and use of land transport infrastructure to enable the movement of goods and people across the region.2. Land transport corridors and land transport infrastructure are protected from incompatible land use activities and subdivision development, where these are defined as critical infrastructure
Te Mana Ora (Community and	S190.114	Transport	TRN - O1	Support	We support this objective.	Retain objective.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Public Health) of the NPHS/ Te Whatu Ora (S190)						
KiwiRail Holdings Limited (S442)	S442.032	Transport	TRN - O1	Amend	KiwiRail supports recognition of the critical role of land transport infrastructure within this objective.	Retain as proposed
Waka Kotahi NZ Transport Agency (S450)	S450.034	Transport	TRN - O1	Support	Waka Kotahi supports the objective is it recognises the importance of the transport network and how it provides for the people and communities.	Retain as proposed.
Foodstuffs (South Island) Properties Limited and Foodstuffs South Island Limited (S464)	S464.039	Transport	TRN - O1	Support	Foodstuffs support the recognition of the important role road infrastructure plays in supporting the West Coast and the need to protect the use of this infrastructure.	Retain recognition of the important role road infrastructure plays in supporting the West Coast and the need to protect the use of this infrastructure.
TiGa Minerals and Metals Limited (S493)	S493.026	Transport	TRN - O1	Amend	This objective should be located in the Strategic Directions chapter.	Retain, but move to CONNECTIONS AND RESILIENCE under STRATEGIC DIRECTIONS.
WMS Group (HQ) Limited and WMS Land Co. Limited (S599)	S599.002	Transport	TRN - O1	Support	Must also recognise the critical role of transport infrastructure	that objective TRN-O1 is moved to the 'Connections and Resilience' strategic objectives
WMS Group (HQ) Limited and WMS Land Co. Limited (S599)	S599.030	Transport	TRN - O1	Amend	Given the significance of the land transport infrastructure network to the local economy and communities, should be located in the Strategic Directions chapter.	Retain, but move to CONNECTIONS AND RESILIENCE under STRATEGIC DIRECTIONS. Include an additional objective within the Transport chapter which similarly recognises the importance of protecting the land transport infrastructure.
Grey District Council (S608)	S608.524	Transport	TRN - O1	Support	Recognises the importance of infrastructure.	Important to note that this needs to be supported also by appropriate rules and practical conditions to allow implementation.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						See notes below.
Karamea Lime Company (S614)	S614.020	Transport	TRN - O1	Support		Retain
Peter Langford (S615)	S615.020	Transport	TRN - O1	Support		Retain
David Moore (S65)	S65.002	Transport	TRN - O2	Support		Retain
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.115	Transport	TRN - O2	Support	We strongly support this objective as active transport has significant environmental health benefits - including producing no air pollution, noise pollution or greenhouse gas emissions.	Retain objective.
Waka Kotahi NZ Transport Agency (S450)	S450.035	Transport	TRN - O2	Support in part	The objective is generally supported as it is recognised that any changes to transport infrastructure should consider effects on character, landscape, amenity and on the environment. However, it is considered that 'minimise' can be interpreted in a way that would be a disproportionately onerous requirement to manage these effects. It is recommended that this word be replaced with 'mitigate' to appropriately manage adverse effects on the environment.	Amend the objective as follows: To manage the effects of land transport infrastructure on the character, landscape and amenity of the towns, settlements and rural areas and mitigate minimise adverse effects on the environment.
Foodstuffs (South Island) Properties Limited and Foodstuffs South Island Limited (S464)	S464.040	Transport	TRN - O2	Oppose	Amenity effects have not previously been considered in West Coast district plans. Further, restrictions on the use of roads will decrease economic activity.	To manage the effects of land transport infrastructure on the character, landscape and amenity of the towns, settlements and rural areas and minimise adverse effects on the environment. Or, alternatively, amend as follows: To provide for the safe and efficient operation of land transport infrastructure, while managing adverse effects on the surrounding environment.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
TiGa Minerals and Metals Limited (S493)	S493.027	Transport	TRN - O2	Oppose	Introduces the requirement to consider amenity effects of land transport infrastructure.	Delete objective TRN - O2, or Amend: To provide for the safe and efficient operation manage the effects of land transport infrastructure on the character, landscape and amenity of the towns, settlements and rural areas and minimise while managing adverse effects on the surrounding environment.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.172	Transport	TRN - O2	Oppose in part	Minimise is inappropriate.	Replace "minimise" with " avoid, remedy or mitigate in accordance with the Natural Environment and District Wide chapters of this Plan. "
WMS Group (HQ) Limited and WMS Land Co. Limited (S599)	S599.031	Transport	TRN - O2	Oppose	Such a requirement could significantly restrict the movement of people and goods across the region, including mineral concentrate.	Delete objective TRN - O2, or alternatively amend as follows: To provide for the safe and efficient operation of land transport infrastructure, while managing adverse effects on the surrounding environment.
Birchfield Coal Mines Ltd (S601)	S601.025	Transport	TRN - O2	Oppose	The requirement to consider amenity effects of land transport is contrary to CR - O2.	Delete objective TRN - O2, or alternatively amend as follows: "To provide for the safe and efficient operation of land transport infrastructure, while managing adverse effects on the surrounding environment."
Grey District Council (S608)	S608.525	Transport	TRN - O2	Support in part	Use of "minimise" rather than "mitigate" changes the focus and possibly the intent of the objective which could result in more stringent and not as practical (cost/safety/risk) requirements (i.e., more difficult and costly for Council to provide emergency and core infrastructure services).	Re-word to include "mitigate" rather than "minimise".

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Karamea Lime Company (S614)	S614.021	Transport	TRN - O2	Support		Retain
Peter Langford (S615)	S615.021	Transport	TRN - O2	Support		Retain
David Moore (S65)	S65.003	Transport	TRN - O3	Support		Retain
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.116	Transport	TRN - O3	Support	We strongly support this objective as active transport has significant environmental health benefits - including producing no air pollution, noise pollution or greenhouse gas emissions. Additionally, active transport contributes to positive physical and mental health, including reducing the impact of obesity, diabetes, and cardiovascular disease in the community.	Retain objective.
Herenga ā Nuku Aotearoa Outdoor Access Commission (S274)	S274.002	Transport	TRN - O3	Amend	The focus of the objective has shifted from that of the exposure draft. It appears to give less importance to pedestrians and cyclists, referring to them in relation to amenity only, rather than accessibility, safety and connectivity. We recommend returning to the previous version.	Amend TRN-O3 as follows: To enable accessibility, safety, and connectivity and amenity of land transport infrastructure and consider the amenity of all transport users, including pedestrians and cyclists.:
Karen Lippiatt (S439)	S439.014	Transport	TRN - O3	Amend	Generally support. More emphasis required on active transport of all variations e.g. walking, cycling, scooting, wheelchair, riding	Amend as follows: TRN -O3 To enable accessibility, safety and connectivity of land transport infrastructure and consider provide for the amenity of all transport users, including pedestrians and cyclists.
KiwiRail Holdings Limited (S442)	S442.033	Transport	TRN - O3	Support	The safety and connectivity of land transport infrastructure is essential. If the interface between roads and rail corridors is not managed effectively, there is the potential for poor safety outcomes. KiwiRail supports the intent of this objective.	Retain as proposed

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Waka Kotahi NZ Transport Agency (S450)	S450.036	Transport	TRN - O3	Support	Waka Kotahi supports the objective as it enables accessibility, safety, connectivity, and amenity for all modes of transport.	Retain as proposed.
Ministry of Education Te Tāhuhu o Te Mātauranga (S456)	S456.006	Transport	TRN - O3	Support	The Ministry supports this objective as it promotes a safe, efficient and integrated transport network for the District including for active transport.	Retain as proposed.
Foodstuffs (South Island) Properties Limited and Foodstuffs South Island Limited (S464)	S464.041	Transport	TRN - O3	Not Stated	As above in relation to amenity effects.	To enable accessibility, safety and connectivity of land transport infrastructure and consider the amenity of for all transport users, including pedestrians and cyclists.
TiGa Minerals and Metals Limited (S493)	S493.028	Transport	TRN - O3	Amend	Introduces the requirement to consider amenity effects of land transport infrastructure.	Amend: To enable accessibility, safety and connectivity of land transport infrastructure and consider the amenity of for all transport users, including pedestrians and cyclists.
WMS Group (HQ) Limited and WMS Land Co. Limited (S599)	S599.032	Transport	TRN - O3	Amend	Introduces the requirement to consider amenity effects of land transport infrastructure	Amend objective TRN - O3 as follows: To enable accessibility, safety and connectivity of land transport infrastructure and consider the amenity of for all transport users, including pedestrians and cyclists.
Birchfield Coal Mines Ltd (S601)	S601.026	Transport	TRN - O3	Amend	Introduces the requirement to consider amenity effects of land transport infrastructure.	Amend as follows: To enable accessibility, safety and connectivity of land transport infrastructure and consider the amenity effor all transport users, including pedestrians and cyclists.
Grey District Council (S608)	S608.526	Transport	TRN - O3	Support	Encourages discussions between developers and Council to ensure that potential impacts on Council infrastructure are taken into account.	Retain

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Karamea Lime Company (S614)	S614.022	Transport	TRN - O3	Support		Retain
Peter Langford (S615)	S615.022	Transport	TRN - O3	Support		Retain
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.117	Transport	TRN - O4	Support	We strongly support this objective as improved resilience to hazards and climate change has good public health outcomes for people and communities.	Retain objective.
KiwiRail Holdings Limited (S442)	S442.034	Transport	TRN - O4	Support	KiwiRail supports the objective to encourage a resilient transport network to natural hazards and climate change.	Retain as proposed
Waka Kotahi NZ Transport Agency (S450)	S450.037	Transport	TRN - O4	Support	Waka Kotahi generally supports that the transport network should be resilient to natural hazards and climate change to recognise its role for community wellbeing and economic activity.	Retain as proposed.
Grey District Council (S608)	S608.527	Transport	TRN - O4	Support	Extreme events are more common and having this recognised when it comes to providing emergency and core infrastructure services is important.	Retain
Toka Tū Ake EQC (S612)	S612.016	Transport	TRN - O4	Support	Support resilience to natural hazards and climate change	No change
Karamea Lime Company (S614)	S614.023	Transport	TRN - O4	Support		Retain
Peter Langford (S615)	S615.023	Transport	TRN - O4	Support		Retain
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.118	Transport	TRN - O5	Support	We support this objective.	Retain objective.
KiwiRail Holdings Limited (S442)	S442.035	Transport	TRN - O5	Support	KiwiRail supports provision of safe and efficient access.	Retain as proposed
Waka Kotahi NZ Transport Agency (S450)	S450.038	Transport	TRN - O5	Support	Waka Kotahi supports the objective as it ensures safe and efficient parking,	Retain as proposed.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					loading and access consistent with the zoning.	
Grey District Council (S608)	S608.528	Transport	TRN - O5	Support	Encourages discussions between developers and Council to ensure that potential impacts on Council infrastructure are taken into account.	Retain
Karamea Lime Company (S614)	S614.024	Transport	TRN - O5	Support		Retain
Peter Langford (S615)	S615.024	Transport	TRN - O5	Support		Retain
TiGa Minerals and Metals Limited (S493)	S493.029	Transport	Transport Policies	Amend	Do not adequately protect or enable vital land transport links.	Include an additional policy as follows: "Recognise, protect and enable the function of land transport infrastructure to ensure the safe and efficient movement of people and goods. "
Buller District Council (S538)	S538.069	Transport	Transport Policies	Support in part	<p>Council generally supports the objectives and policies for Transport with one minor exception.</p> <p>The overview statement advises that the Transport Performance Standards uses the One Network Rooding Classification System, however it is understood that there is a move away from this towards the One Network Framework. Council seeks that an additional clause is added to Policy 1 that requires recognition of a roads classification when considering proposals that impact the road transport network and that road classification may change over time.</p>	<p>Amend Policy 1 as follows:</p> <p>The road and rail transport networks shall: Be maintained or enhanced to provide safe and efficient transportation; Consider the needs of all transport users and modes of transport; and Minimise effects on adjoining properties including the impacts of vibration, noise and glare; and Recognise the different functions and design requirements for each road classification under the most current National Transport Network classification system.</p> <p>While Council has not sought inclusion of a Road Hierarchy information into the Transport Performance Standards, consideration should be given to whether this would be a helpful addition.</p>

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Chris & Jan Coll (S558)	S558.719	Transport	Transport Policies	Support		Retain
Chris J Coll Surveying Limited (S566)	S566.719	Transport	Transport Policies	Support		Retain
William McLaughlin (S567)	S567.076	Transport	Transport Policies	Support		Retain
Laura Coll McLaughlin (S574)	S574.719	Transport	Transport Policies	Support		Retain
WMS Group (HQ) Limited and WMS Land Co. Limited (S599)	S599.033	Transport	Transport Policies	Amend	Do not adequately protect or enable vital land transport links. An additional policy is required	Include an additional policy as follows: Recognise, protect and enable the function of land transport infrastructure to ensure the safe and efficient movement of people and goods.
Birchfield Coal Mines Ltd (S601)	S601.027	Transport	Transport Policies	Amend	Tfo not adequately protect or enable vital land transport links.	New policy: Recognise, protect and enable the function of land transport infrastructure to ensure the safe and efficient movement of people and goods.
Fuel Companies (S613)	S613.012	Transport	Transport Policies	Support	The Fuel Companies support seeking resilience to the effects of climate change and supports reduction in greenhouse gas emissions	Retain Policy TRN-P6 and Policy TRN-P8 as notified.
David Moore (S65)	S65.004	Transport	TRN - P1	Support	Particularly support P1c	Retain
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.119	Transport	TRN - P1	Support	We strongly support this policy that acknowledges safety of road and rail networks and the importance of minimising the effects of noise, vibration and glare on adjoining properties for good public health outcomes.	Retain policy.
KiwiRail Holdings Limited (S442)	S442.036	Transport	TRN - P1	Support	KiwiRail is committed to maintaining and enhancing the rail network to provide safe and efficient transportation and therefore supports this policy.	Retain as proposed

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Waka Kotahi NZ Transport Agency (S450)	S450.039	Transport	TRN - P1	Support in part	Waka Kotahi generally supports the policy as it requires that road networks be maintained or enhanced to provide for safety and efficient transportation, and to consider the needs of transport users and modes of transport. However, as per the submission point in TRN-O2 it is recommended that 'minimise' be replaced with 'mitigate' to appropriately manage adverse effects on the environment.	Amend the policy as follows: The road and rail networks shall; a. Be maintained or enhanced to provide safe and efficient transportation; b. Consider the needs of all transport users and modes of transport; and c. Mitigate Minimise effects on adjoining properties including the impacts of vibration, noise and glare.
Ministry of Education Te Tāhuhu o Te Mātauranga (S456)	S456.007	Transport	TRN - P1	Support	The Ministry supports the promotion of safe and efficient transport networks that meet the needs of all transport users.	Retain as proposed.
Foodstuffs (South Island) Properties Limited and Foodstuffs South Island Limited (S464)	S464.042	Transport	TRN - P1	Not Stated	As above in relation to amenity effects.	The road and rail networks shall; Be maintained or enhanced to provide safe and efficient transportation; Consider the needs of all transport users and modes of transport; and Minimise effects on adjoining properties including the impacts of vibration, noise and glare.
TiGa Minerals and Metals Limited (S493)	S493.030	Transport	TRN - P1	Amend	Because existing housing is located in close proximity to roads, difficult to achieve.	Amend TRN - P1 as follows: The road and rail networks shall; a. Be maintained or enhanced to provide safe and efficient transportation; b. Consider the needs of all transport users and modes of transport; and c. Minimise effects on adjoining properties including the impacts of vibration, noise and glare.
WMS Group (HQ) Limited and WMS Land Co. Limited (S599)	S599.034	Transport	TRN - P1	Amend	Existing housing is located in close proximity to roads, this aspect of the policy would be difficult for many activities to achieve.	Amend TRN - P1 as follows: The road and rail networks shall; a. Be maintained or enhanced to provide safe and efficient transportation;

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						b. Consider the needs of all transport users and modes of transport; and c. Minimise effects on adjoining properties including the impacts of vibration, noise and glare.
Birchfield Coal Mines Ltd (S601)	S601.028	Transport	TRN - P1	Amend	Requires amenity effects of road and rail networks to be minimised	Amend TRN - P1 as follows: "The road and rail networks shall; a. Be maintained or enhanced to provide safe and efficient transportation; b. Consider the needs of all transport users and modes of transport; and c. Minimise effects on adjoining properties including the impacts of vibration, noise and glare. "
Grey District Council (S608)	S608.529	Transport	TRN - P1	Support in part	Use of "minimise" rather than "mitigate" changes the focus and possibly the intent of the policy which could result in more stringent and not as practical (cost/safety/risk) requirements (i.e., more difficult and costly for Council to provide emergency and core infrastructure services).	Re-word to include "mitigate" rather than "minimise".
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.120	Transport	TRN - P2	Support	We strongly support this policy that acknowledges safety for communities and all road users. for good public health outcomes.	Retain policy.
KiwiRail Holdings Limited (S442)	S442.037	Transport	TRN - P2	Amend	KiwiRail supports policy that promotes safety at vehicle crossings. KiwiRail seeks amendment to this policy to ensure that rail level crossings are a consideration as well as intersections and State Highways.	Amend as follows: Vehicle crossings and associated access will; Be designed and located to provide for safe, effective and efficient movement to and from sites; Minimise potential conflicts between vehicles, pedestrians and cyclists on the adjacent road network; and Manage vehicle access to and from sites adjacent to rail level crossings , intersections, and where State Highways meet.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Waka Kotahi NZ Transport Agency (S450)	S450.040	Transport	TRN - P2	Support in part	The policy is generally supported by Waka Kotahi. However, it is considered that P2.a and P2.c achieve similar outcomes. By providing safe, effective, and efficient movement to and from sites you are also manage vehicle access at intersections and where state highways meet. It is recommended that P2.c be deleted to avoid repetition.	Amend the policy be deleting P.2c.
Grey District Council (S608)	S608.530	Transport	TRN - P2	Support	Encourages discussions between developers and Council to ensure that potential impacts on Council infrastructure are taken into account.	Retain
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.121	Transport	TRN - P3	Support	We strongly support this policy that acknowledges safety for communities and all road users. for good public health outcomes.	Retain policy.
KiwiRail Holdings Limited (S442)	S442.038	Transport	TRN - P3	Amend	KiwiRail supports the intent of this policy but seeks amendment to ensure that buildings, structures, planting or other visual obstructions vegetation are restricted within sightlines of rail level crossings.	Amend as follows: Maximise user safety at road and rail level crossings by considering the location of restricting buildings , structures, planting and other visual obstructions within sightlines.
Waka Kotahi NZ Transport Agency (S450)	S450.041	Transport	TRN - P3	Support	The policy is supported as it ensures that sightlines are maintained as much as possible by restricting where buildings or other visual obstructions may be located.	Retain as proposed.
Grey District Council (S608)	S608.531	Transport	TRN - P3	Support	Encourages discussions between developers and Council to ensure that potential impacts on Council infrastructure are taken into account.	Retain
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.122	Transport	TRN - P4	Support	We support this policy.	Retain policy.
KiwiRail Holdings Limited (S442)	S442.039	Transport	TRN - P4	Amend	KiwiRail does not typically support new at-grade level crossings. KiwiRail seeks	Amend as follows: Ensure any new r Road and pedestrian rail level crossings

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					amendment to this policy to strengthen the wording and requirement to achieve safety at all rail crossings.	carefully consider the must ensure safety of road users, pedestrians, and the effective and efficient operation of the regions rail network.
Waka Kotahi NZ Transport Agency (S450)	S450.042	Transport	TRN - P4	Support	Waka Kotahi supports this policy as it ensures the safety of road users and pedestrians at road and pedestrian rail level crossings.	Retain as proposed.
Grey District Council (S608)	S608.532	Transport	TRN - P4	Support	Encourages discussions between Council and KiwiRail to maintain relationships. Intersecting transport infrastructure should be a collaborative process.	Retain
David Moore (S65)	S65.005	Transport	TRN - P5	Support		Retain
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.123	Transport	TRN - P5	Support	We support this policy.	Retain policy.
KiwiRail Holdings Limited (S442)	S442.040	Transport	TRN - P5	Support	KiwiRail supports the control of vehicle access to sites adjacent to all road/rail level crossings to improve safety for road users on the approach to level crossings.	Retain as proposed
Waka Kotahi NZ Transport Agency (S450)	S450.043	Transport	TRN - P5	Support	Waka Kotahi supports this policy as it promotes safety by controlling vehicle access to sites adjacent to all road and rail level crossings.	Retain as proposed.
Grey District Council (S608)	S608.533	Transport	TRN - P5	Support	Encourages discussions between developers and Council to ensure that potential impacts on Council infrastructure are taken into account.	Retain
David Moore (S65)	S65.006	Transport	TRN - P6	Support		Retain
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.124	Transport	TRN - P6	Support	We strongly support this policy that enables accessibility, connectivity and amenity for pedestrians and cyclists thereby enabling achievement of healthy	Retain policy.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					lifestyle options for people and communities.	
Waka Kotahi NZ Transport Agency (S450)	S450.044	Transport	TRN - P6	Support	Waka Kotahi supports the policy as it enables the provision of electric vehicle and bicycle charging stations. This infrastructure supports the reduction in transport-related greenhouse gas emissions.	Retain as proposed.
David Moore (S65)	S65.007	Transport	TRN - P7	Support		Retain
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.125	Transport	TRN - P7	Support	We strongly support this policy that enables accessibility, connectivity and amenity for pedestrians and cyclists thereby enabling achievement of healthy lifestyle options for people and communities.	Retain policy.
Herenga ā Nuku Aotearoa Outdoor Access Commission (S274)	S274.007	Transport	TRN - P7	Amend	TRN-P7: Support increased cycling and walking by: a. Requiring larger developments to provide bicycle parking and b. Providing for off-road pedestrian and bicycle facilities [typo to be corrected] to complement facilities located within the road network. The specific means of supporting increased cycling and walking are limited to facilities.	Add an additional clause: " Providing for connectivity within, between and across subdivisions and communities. "
Karen Lippiatt (S439)	S439.015	Transport	TRN - P7	Support	For safety reasons I particularly support b. provide off road cycling and walking routes	Retain as notified.
Waka Kotahi NZ Transport Agency (S450)	S450.045	Transport	TRN - P7	Support in part	The policy is generally supported as Waka Kotahi seeks that cycling and walking modes of transport are promoted. However, there is a concern that the subsequent rules and standards do not align with the outcomes sought by this policy. The standards that require cycle parking spaces are based on the number of car parking spaces provided. There are no specific standards or rules that	Review the rules and standards relating to cycle parking facilities to provide better alignment with this policy.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					only require cycle parking without the need for car parking spaces. A key issue with this is that there are now no longer requirements for car parking spaces under the National Planning Standards. It is recommended that cycle parking be better promoted to ensure that active modes of transport are appropriately considered. The policy, rules and standards need to be updated to reflect this so that better transport outcomes can be delivered, which will also support carbon emission outcomes in the transport network.	
Grey District Council (S608)	S608.534	Transport	TRN - P7	Support	Encourages discussions between developers and Council to ensure that potential impacts on Council infrastructure are taken into account.	Retain
David Moore (S65)	S65.008	Transport	TRN - P8	Support		Retain
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.126	Transport	TRN - P8	Support	We strongly support this policy that enables accessibility, connectivity and amenity for pedestrians and cyclists thereby enabling achievement of healthy lifestyle options for people and communities.	Retain policy.
Waka Kotahi NZ Transport Agency (S450)	S450.046	Transport	TRN - P8	Support in part	The policy is generally supported. However, it is noted that there is repetition between P8.b and P8.c. It is recommended that P8.c be deleted.	Amend policy by deleting P8.c.
Ministry of Education Te Tāhuhu o Te Mātauranga (S456)	S456.008	Transport	TRN - P8	Support	The Ministry supports this policy as it promotes public health and community wellbeing through safe transport network for the District. This policy aligns with the Ministry's focus on encouraging active modes of transport for students and employees to and from Educational Facilities where possible.	Retain as proposed.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Chris & Jan Coll (S558)	S558.727	Transport	TRN - P8	Support		Retain
Chris J Coll Surveying Limited (S566)	S566.727	Transport	TRN - P8	Support		Retain
William McLaughlin (S567)	S567.084	Transport	TRN - P8	Support		Retain
Laura Coll McLaughlin (S574)	S574.727	Transport	TRN - P8	Support		Retain
Grey District Council (S608)	S608.535	Transport	TRN - P8	Support	Encourages discussions between developers and Council to ensure that potential impacts on Council infrastructure are taken into account.	Retain
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.127	Transport	TRN - P9	Support	We support this policy.	
Waka Kotahi NZ Transport Agency (S450)	S450.047	Transport	TRN - P9	Support	Waka Kotahi supports that parking and loading areas are designed so that reverse manoeuvring of vehicles onto or off roads, including State Highways, does not occur where it may have an impact on the safe, effective, and efficient operation of roads or may impact on pedestrian access.	Retain as proposed.
Ministry of Education Te Tāhuhu o Te Mātauranga (S456)	S456.009	Transport	TRN - P9	Support	The Ministry supports this policy as it promotes safe and efficient operation of the integrated transport network	Retain as proposed.
Grey District Council (S608)	S608.536	Transport	TRN - P9	Support	Encourages discussions between developers and Council to ensure that potential impacts on Council infrastructure are taken into account.	Retain
Rocky Mining Limited (S474)	S474.031	Transport	Transport Rules	Oppose in part		remove from the rules any assessment of amenity effects caused by use of the

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						transport network
Buller District Council (S538)	S538.078	Transport	Transport Rules	Not Stated	While high trip generating activities are restricted discretionary activities (Rule 12) there is no permitted trip generation rule. Council assumes that this has been inadvertently left off and seeks that permitted threshold limits are included.	Include a new rule as follows: Trip Generation Activities Activity Status: Permitted Where: 1. The activity complies with the thresholds listed in Table TRN 6
Grey District Council (S608)	S608.538	Transport	Advice Notes:	Support in part	1. Assume that any non-Council Utility Provider must still consult with Council prior to any works being undertaken. 2. Assume works undertaken in the road reserve or designation by the roading authority may not have the same requirements as works undertaken by other parties. This advice note refers to requiring a road opening approval to undertake work in the road reserve / transport corridor - amend wording to require a "road works permit" to be applied for and approved prior to works being undertaken. 4. and 5. Encourages good relationship and communication between Council and WK/KR. 5. Is this appropriate for local situations?	Clarify or add words as necessary to ensure no ambiguity. Amend wording to: a "road works permit" is required prior to works being undertaken.... Ensure that these standards do not put unrealistic or unsuitable requirements in place.
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.128	Transport	TRN - R1	Support	We support this rule.	Retain rule.
Waka Kotahi NZ Transport Agency (S450)	S450.049	Transport	TRN - R1	Support in part	Waka Kotahi supports the intent of the rule. However, there are concerns with the outcomes in this rule, which are listed below: 1. The reference to transport standards in general is supported. However, the transport standards do not provide any vehicle crossing design guidance for both the state highway and	Amend the rule and standards to ensure that is clarity to the outcomes sought for vehicle crossings, that it refers to appropriate stormwater guidelines and that it is consistent with the National Planning Standards.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					<p>the local roading network. This could lead to confusion on vehicle crossing requirements, such as whether there is a need for a Diagram C or a Diagram E crossing. It is recommended that the standards provide for vehicle crossing design guidance, or for the state highway in particular to refer to Waka Kotahi NZ Transport Agency guidance - Planning Policy Manual.</p> <p>2. It is unusual to refer to guidance from another region to manage stormwater effects, which has a different environment to the West Coast. It is recommended that consideration be given to whether this guidance is appropriate for the West Coast region. 3. The form of these standards is not consistent with the National Planning Standards, which requires that the standards are to be included within the transport chapter. It is recommended that the above points be considered to ensure that is clarity in the plan and that it is consistent with the National Planning Standards.</p>	
Buller District Council (S538)	S538.071	Transport	TRN - R1	Oppose in part	<p>Council has noted a number of linkage errors between Rule 1 and the Transport Performance Standards, as follows: Clause 2 sets down the applicable parking, loading, queuing standards, therefore this should include TRN S12 as this sets down construction and formation requirements for parking, loading and standing spaces. As a consequence, the reference to TRN S12 in clause 5 should be removed.</p> <p>Clause 4 and the associated Advice Note</p>	<p>Amend Rule 1 as follows:</p> <ol style="list-style-type: none"> 1. Vehicle crossings and access way standards - TRN Tables 1 - 3, Standards TRN S1 - S3, and TRN Figures 1 are complied with; 2. Parking, loading, queuing and standing standards - TRN Tables 4-5, Standards TRN S4 - S6 and TRN S12, and TRN Figures 2 and 3 are complied with; 3. Manoeuvring standards TRN S7 - S11 are complied with; 4. Where an impermeable carparking area

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					<p>are not considered necessary as the Transport Performance Standards include controls for stormwater (refer TRN S12). The stormwater performance standard is not limited in scope to a specified parking area limit which is considered appropriate. Council therefore seeks the removal of Clause 4 and the associated Advice Note.</p> <p>Clause 5 refers to 'formation' standards, but Council's preference is that this is changed to 'dimensional' standards given TRN S13 relates to minimum road widths for rights of way. Council also seeks that 'rights of way' are specifically referred to in Clause 5 given the limited application. As discussed above, it is suggested that the parking standard of TRN S12 is removed to ensure all parking standards are mentioned together.</p> <p>Council seeks that an additional clause is inserted to ensure all new local roads and upgrades to existing local roads are formed in accordance with Council Engineering Standards. While Council adopted NZS4404 as its Engineering Standard in 2011, a review has been initiated and the intention is to adopt a new engineering standard in the near future.</p>	<p>greater than 1000m² in area is provided, storm water treatment is provided; and 5. Formation Dimensional standards for right of ways TRN S12 and 6. All new roads and upgrades of existing roads shall be constructed in accordance with the relevant District Council Engineering Standards, or where no such Standard exists, NZS 4404:2010 Land Development and Subdivision Infrastructure. Advice Note: The Auckland Design Manual guideline Document GD 2017/04 Stormwater Management Devices in the Auckland Region provides information on best practice stormwater design options for stormwater treatment.</p>
Chris & Jan Coll (S558)	S558.720	Transport	TRN - R1	Support	We support these rules in principle but note there are errors.	Correct errors.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.173	Transport	TRN - R1	Amend	The permitted activity standards need to refer to the need to comply with rules elsewhere in the Plan, including ECO, NC, NFL, and CE, given the potential for	Add a standard to all PAs that requires adherence to PAs standards of other rules in the pan, including ECO, NC, NFL, and CE.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					adverse effects, and that this is not in NOSZ.	
Chris J Coll Surveying Limited (S566)	S566.720	Transport	TRN - R1	Support	We support these rules in principle but note there are errors.	Correct errors.
William McLaughlin (S567)	S567.077	Transport	TRN - R1	Support	We support these rules in principle but note there are errors.	Correct errors.
Fire and Emergency New Zealand (S573)	S573.010	Transport	TRN - R1	Oppose in part	Fire and Emergency oppose part of TRN-R1 where requests to alter the minimum driveway width within Standard S3 to allow for fire appliance access and the inclusion of an additional standard relating to firefighting access.	No amendment sought to this rule.
Laura Coll McLaughlin (S574)	S574.720	Transport	TRN - R1	Support	We support these rules in principle but note there are errors.	Correct errors.
Grey District Council (S608)	S608.540	Transport	TRN - R1	Support in part	Confirmation of the suitability of the Auckland design guide for stormwater in relation to local environment conditions and site constraints.	Ensure that these standards do not put unrealistic or unsuitable requirements in place.
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.129	Transport	TRN - R2	Support	We support this rule.	Retain rule.
Waka Kotahi NZ Transport Agency (S450)	S450.050	Transport	TRN - R2	Support in part	The rule is generally supported. However, the title of this rule and R2.2.c refer to designations, under which matters regulated by section 9(3) do not apply (where they are consistent with the purpose of the designation). Designations have the ability to cover land transport operation, removal, repairs, and maintenance. It is recommended that the title be amended to remove reference to designations and to delete R2.2.c.	Amend the rule as follows: Heading - Land transport operation, removal, repairs and maintenance within a road reserve / transport corridor or an area subject to designation. Activity Status Permitted Where: 1. All performance standards in Rule TRN - R1 are complied with; and 2. The works are undertaken: a. By, or on behalf of, a road controlling authority; or b. In accordance with a subdivision consent;

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						ore. By a requiring authority in accordance with a designation listing in this Plan.
Buller District Council (S538)	S538.072	Transport	TRN - R2	Oppose in part	<p>The title for Rule 2 is confusing and Council seeks that this is simplified to make it clear that it covers maintenance and repair of existing transport infrastructure within the existing road corridor. Council does not see the necessity for including the 'removal of roads' in the rule, if this relates to Road Stopping then this is subject to a separate Council process outside of this Plan.</p> <p>A definition of 'transport corridor' is sought to ensure that maintenance and upgrading work is able to be undertaken within the entire road or rail reserve rather than just limited to the actual sealed/graveled/railed portion of any road or railway line.</p>	<p>Amend the title and body of Rule 2 as follows: Land Transport operation, removal, repairs and maintenance within a road reserve/transport corridor or an area subject to designation Maintenance or upgrading of existing transport infrastructure within the existing transport corridor</p> <p>Insert a definition of 'Transport Corridor' into the Definition Section.</p>
Chris & Jan Coll (S558)	S558.722	Transport	TRN - R2	Support	Support this rule in principle but note that oppose the Transport Performance Standards	REtain
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.174	Transport	TRN - R2	Amend	The permitted activity standards need to refer to the need to comply with rules elsewhere in the Plan, including ECO, NC, NFL, and CE, given the potential for adverse effects.	The permitted activity standards need to refer to the need to comply with rules elsewhere in the Plan, including ECO, NC, NFL, and CE, given the potential for adverse effects, and that this is not in NOSZ.
Chris J Coll Surveying Limited (S566)	S566.722	Transport	TRN - R2	Support	Support this rule in principle but note that oppose the Transport Performance Standards	REtain
William McLaughlin (S567)	S567.079	Transport	TRN - R2	Support	Support this rule in principle but note that oppose the Transport Performance Standards	REtain

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Laura Coll McLaughlin (S574)	S574.722	Transport	TRN - R2	Support	Support this rule in principle but note that oppose the Transport Performance Standards	REtain
Grey District Council (S608)	S608.541	Transport	TRN - R2	Amend	Assuming all roads are designated, land use activities within the designation should not require further authorisation as long as they are in accordance with the purpose of the designation. The definition of 'maintenance' excludes "upgrades" however this is very general and does put significant and possibly unnecessary limits on the activities that can be undertaken within the road corridor. What is the intent of this rule? i.e., what activities does it intend to capture?	Amend accordingly so appropriate rules and conditions can be applied to standard Council activities.
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.130	Transport	TRN - R3	Support	We support this rule.	Retain rule.
Waka Kotahi NZ Transport Agency (S450)	S450.051	Transport	TRN - R3	Support in part	As per the submission point on TRN-R2, it is recommended that reference to designations be deleted as these are already covered by the designation.	Amend rule as follows: Activity Status Permitted. Where: 1. All performance standards in Rule TRN - R1 are complied with; 2. The works are undertaken: i. By, or on behalf of, a road controlling authority; or ii. In accordance with an approved subdivision consent; or iii. By a requiring authority in accordance with a designation listed in this Plan.
Buller District Council (S538)	S538.073	Transport	TRN - R3	Support	Rule 3 is supported.	Retain as notified.
Chris & Jan Coll (S558)	S558.723	Transport	TRN - R3	Amend	This activity should also be permitted if the RCA gives consent.	Amend as follows: Where: 1. All performance standards in Rule TRN - R1 are complied with; and 2. The works are undertaken: i.; or iv. With the written consent of

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						the road controlling authority.
Chris & Jan Coll (S558)	S558.724	Transport	TRN - R3	Amend	This activity should also be able to be undertaken on behalf of the RCA or with written consent.	Where: 1. This is undertaken by a requiring authority, or on their behalf or with written consent of the requiring authority , in accordance with a designation listed in this Plan.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.175	Transport	TRN - R3	Amend	The permitted activity standards need to refer to the need to comply with rules elsewhere in the Plan, including ECO, NC, NFL, and CE, given the potential for adverse effects.	The permitted activity standards need to refer to the need to comply with rules elsewhere in the Plan, including ECO, NC, NFL, and CE, given the potential for adverse effects, and that this is not in NOSZ.
Chris J Coll Surveying Limited (S566)	S566.723	Transport	TRN - R3	Amend	This activity should also be permitted if the RCA gives consent.	Amend as follows: Where: 1. All performance standards in Rule TRN - R1 are complied with; and 2. The works are undertaken: i.; or iv. With the written consent of the road controlling authority.
Chris J Coll Surveying Limited (S566)	S566.724	Transport	TRN - R3	Amend	This activity should also be able to be undertaken on behalf of the RCA or with written consent.	Where: 1. This is undertaken by a requiring authority, or on their behalf or with written consent of the requiring authority , in accordance with a designation listed in this Plan.
William McLaughlin (S567)	S567.080	Transport	TRN - R3	Amend	This activity should also be permitted if the RCA gives consent.	Amend as follows: Where: 1. All performance standards in Rule TRN - R1 are complied with; and 2. The works are undertaken:

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						i.; oriv. With the written consent of the road controlling authority.
William McLaughlin (S567)	S567.081	Transport	TRN - R3	Amend	This activity should also be able to be undertaken on behalf of the RCA or with written consent.	Where: 1. This is undertaken by a requiring authority, or on their behalf or with written consent of the requiring authority , in accordance with a designation listed in this Plan.
Laura Coll McLaughlin (S574)	S574.723	Transport	TRN - R3	Amend	This activity should also be permitted if the RCA gives consent.	Amend as follows: Where: 1. All performance standards in Rule TRN - R1 are complied with; and 2. The works are undertaken: i.; oriv. With the written consent of the road controlling authority.
Laura Coll McLaughlin (S574)	S574.724	Transport	TRN - R3	Amend	This activity should also be able to be undertaken on behalf of the RCA or with written consent.	Where: 1. This is undertaken by a requiring authority, or on their behalf or with written consent of the requiring authority , in accordance with a designation listed in this Plan.
Grey District Council (S608)	S608.542	Transport	TRN - R3	Support in part	Assuming all roads are designated, land use activities within the designation should not require further authorisation as long as they are in accordance with the purpose of the designation.	Amend accordingly so appropriate rules and conditions can be applied to standard Council activities.
Te Mana Ora (Community and Public Health) of the	S190.131	Transport	TRN - R4	Support	We support this rule.	Retain rule.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
NPHS/ Te Whatu Ora (S190)						
Waka Kotahi NZ Transport Agency (S450)	S450.052	Transport	TRN - R4	Oppose	The rule is opposed, similar to the submission point on TRN-R2, it is recommended that this rule be deleted as Section 9(3) rules do not apply to designations. The rule appears to be repeating the purpose of a designation.	Delete the rule and make it as a new discretionary rule.
Buller District Council (S538)	S538.074	Transport	TRN - R4	Support	Rule 3 is supported.	Retain as notified.
Buller District Council (S538)	S538.075	Transport	TRN - R4	Support in part	Council considers that design standards are needed for new transport corridors and seeks that these are designed and constructed in accordance with the Rule 1 performance standards. This will ensure that new roads are formed in accordance with Council's Engineering Standards.	Amend Rule 4 as follows: This is undertaken by a requiring authority in accordance with a designation listed in this Plan. All performance standards in Rule TRN-R1 are complied with.
Grey District Council (S608)	S608.543	Transport	TRN - R4	Support in part	Would a new transport corridor automatically be designated? Unsure what the point of this rule is and why a consent would be required for it? Does this refer to only the physical creation of the road or the creation of the road corridor boundaries?	Clarification required to ensure all parties are aware of relevant rules and responsibilities.
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.132	Transport	TRN - R5	Support	We support this rule.	Retain rule.
Herenga ā Nuku Aotearoa Outdoor Access Commission (S274)	S274.008	Transport	TRN - R5	Amend	TRN-R5: Establishment of shared pathways including cycleways and bridleways on public land	Add " including all legal roads " at the end of the sentence.
Karen Lippiatt (S439)	S439.016	Transport	TRN - R5	Amend	Shared paths are a good start, but as active transport modes become more popular, council must make provision for the future separation of active modes in high use locations. In places where	Amend as follows: Establishment of active transport routes including shared pathways, including walkways, cycleways, and bridleways.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					volume and speed of the different active modes determine, separate walking and cycling routes must be provided.	
Waka Kotahi NZ Transport Agency (S450)	S450.053	Transport	TRN - R5	Support	Waka Kotahi supports the intent of the rule as it provides a permitted activity status to allow new pathways and cycleways to be established.	Retain as proposed.
Buller District Council (S538)	S538.076	Transport	TRN - R5	Oppose in part	While Council generally supports Rule 5, it is considered that it should be limited in scope to tracks on unformed legal road, esplanade reserves and strips rather than public land generally and that the reference to 'bridleways' is replaced with 'trails' given bridleways are not a common trail type in the District. Esplanade Reserves and Esplanade Strips are vested in local authorities for, among other purposes, public access. Currently where cycleways and trails are constructed on unformed legal road, they trigger the need for consent. Given these trails are formed for recreational activities within a narrow corridor of road reserve, Council considers a permitted activity status is appropriate and any road safety concerns can be managed through Council's road controlling approval processes.	Amend the title of Rule 5 as follows: Establishment of shared pathways including cycleways and trails-bridleways on public land unformed legal road, Esplanade Reserves and Strips
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.176	Transport	TRN - R5	Amend	The permitted activity standards need to refer to the need to comply with rules elsewhere in the Plan, including ECO, NC, NFL, and CE, given the potential for adverse effects.	The permitted activity standards need to refer to the need to comply with rules elsewhere in the Plan, including ECO, NC, NFL, and CE, given the potential for adverse effects, and that this is not in NOSZ.
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.133	Transport	TRN - R6	Support	We support this rule.	Retain rule.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Waka Kotahi NZ Transport Agency (S450)	S450.054	Transport	TRN - R6	Support in part	Waka Kotahi supports the rule as it provides a permitted activity status to allow e-bike and e-vehicle charging stations to be established in the transport corridor. However, it is recommended for clarification that 'land transport authority' in the advice note be replaced with 'road controlling authority'.	Amend as follows: Advice Note: If within the legal road reserve, contact the appropriate road controlling land transport authority to obtain a license to occupy.
Rocky Mining Limited (S474)	S474.023	Transport	TRN - R6	Support		Retain heavy vehicle movement trigger as notified
Straterra (S536)	S536.067	Transport	TRN - R6	Amend	30 heavy vehicle movements per day for mining and quarrying is unworkable and too low.	Increase the number of heavy vehicle movements for a Permitted Activity
Buller District Council (S538)	S538.077	Transport	TRN - R6	Oppose in part	<p>The title of Rule 6 is limited to establishment of charging stations in the transport corridor but the accompanying Advice Note suggests that a wider scope is intended for control of charging stations given the statement: 'If within the legal road reserve, contact the appropriate transport authority to obtain a license to occupy'.</p> <p>Council agrees that control of charging stations is needed given the anticipated growth in electric vehicles but considers controls should extend beyond locations within the transport corridor and requests the removal of this reference from the rule title. Council also considers control needs to be retained over the location of these and seeks that an additional standard is included which limits installation to within existing or permitted parking areas.</p> <p>For consistency of terminology, Council seeks a minor change to the Advice Note</p>	<p>Amend Rule 6 as follows:</p> <p>Establishment of e-bike and e-vehicle charging stations in the transport corridor Activity Status Permitted Where:</p> <p>1. All performance standards in Rule TRN-R1 are complied with; and 2. These are not more than 2m in height and 10m² in area; and 3. The electric vehicle charging station is installed in association with an existing, permitted or consented vehicle parking space/area.</p> <p>Advice Note: If within the legal road reserve, contact the appropriate road controlling land transport authority to obtain a license to occupy.</p>

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					to refer to 'road controlling authority' rather than 'land transport authority' as this is the wording used elsewhere.	
Chris & Jan Coll (S558)	S558.726	Transport	TRN - R6	Support		Retain
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.177	Transport	TRN - R6	Amend	The permitted activity standards need to refer to the need to comply with rules elsewhere in the Plan, including ECO, NC, NFL, and CE, given the potential for adverse effects.	The permitted activity standards need to refer to the need to comply with rules elsewhere in the Plan, including ECO, NC, NFL, and CE, given the potential for adverse effects, and that this is not in NOSZ.
Chris J Coll Surveying Limited (S566)	S566.726	Transport	TRN - R6	Support		Retain
William McLaughlin (S567)	S567.083	Transport	TRN - R6	Support		Retain
Laura Coll McLaughlin (S574)	S574.726	Transport	TRN - R6	Support		Retain
Grey District Council (S608)	S608.544	Transport	TRN - R6	Support in part	Inconsistent use of language when referring to roading authorities, etc.	Amend throughout TTPP as required to be clear and consistent. A definition could possibly be added.
Fuel Companies (S613)	S613.013	Transport	TRN - R6	Amend	Consider that it is important to have a clear permitted activity pathway to support this policy framework which doesn't differentiate where such facilities should be located.	Amend Rule TRN-R6 as follows: Establishment of e-bike and e-vehicle charging stations in all zones and the transport corridor Activity Status Permitted Where: 1. All performance standards in Rule TRN - R1 are complied with.; and 2. These are not more than 2m in height and 10m in area. Advice Note: If within the legal road reserve, contact the appropriate land transport authority to obtain a license to occupy.
Te Mana Ora (Community and Public Health) of the	S190.134	Transport	TRN - R7	Support	We support this rule.	Retain rule.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
NPHS/ Te Whatu Ora (S190)						
Waka Kotahi NZ Transport Agency (S450)	S450.055	Transport	TRN - R7	Support	Waka Kotahi supports the matters of discretion in this rule as a restricted discretionary activity, which allows discretion on the impact of road users and pedestrians, effects on safety and efficiency, safe parking, loading, and queuing, flood hazard mitigation and stormwater treatment and control.	Retain as proposed.
Buller District Council (S538)	S538.079	Transport	TRN - R7	Oppose in part	Rule 7 is supported but Council is concerned with the limited scope of clause (d) to flood hazard mitigation and requests that this is extended to encompass natural hazards generally. Council also seeks that the matters of discretion extend to location and design considerations and the number and intensity of vehicle movements associated with an activity given these are likely to be key assessment matters.	Amend Rule 7 as follows: Discretion is restricted to: d. Any requirements for future flood natural hazard mitigation; and e. Stormwater treatment and control f. The location, size and design of accessways, vehicle crossings, parking and loading areas; and g. The types of vehicles serving the site, their intensity, the time of day the site is frequented and likely trip generation.
Chris & Jan Coll (S558)	S558.725	Transport	TRN - R7	Support		Retain
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.178	Transport	TRN - R7	Amend	The matters of discretion do not provide the ability to consider adverse environmental effects, including on indigenous biodiversity.	Add matters of discretion: - adverse effects on natural values, including those not yet identified on overlays, and the requirement to manage those effects in accordance with the Natural Environment and District Wide chapters of this Plan.
Chris J Coll Surveying Limited (S566)	S566.725	Transport	TRN - R7	Support		Retain

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
William McLaughlin (S567)	S567.082	Transport	TRN - R7	Support		Retain
Laura Coll McLaughlin (S574)	S574.725	Transport	TRN - R7	Support		Retain
Grey District Council (S608)	S608.545	Transport	TRN - R7	Support in part	Impact on the road controlling authority and existing infrastructure is not clear as a matter to consider. It is implied.	More explicit wording.
Toka Tū Ake EQC (S612)	S612.017	Transport	TRN - R7	Support	Support the councils' consideration of flood hazard mitigation	No Change
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.135	Transport	TRN - R8	Support	We support this rule.	Retain rule.
Waka Kotahi NZ Transport Agency (S450)	S450.056	Transport	TRN - R8	Support	The rule and associated matters of discretion are supported for a restricted discretionary activity, which relate to land transport operation, removal, repairs and maintenance within a road reserve / transport corridor or an area subject to a designation.	Retain as proposed.
Buller District Council (S538)	S538.080	Transport	TRN - R8	Oppose in part	As with the corresponding permitted activity rule, the title for Rule 8 is confusing and could be simplified to make it clear that it covers maintenance and repair of existing transport infrastructure within an existing road corridor. Clause (a) is considered vague and arguably related to earthworks considerations. Council seeks that the standard is amended to include assessing the effects on the safe and efficient operation of the road. Council also requests that Clause (b) is extended to cover any future natural hazard mitigation generally rather than limited in scope to flood hazards.	Amend the title and body of Rule 8 as follows: Land transport operation, removal, repairs and maintenance within a road reserve/transport corridor or an area subject to a designation not meeting Permitted Activity Standards. Discretion is restricted to: (a) Impacts during construction Effects on the safe and efficient operation of the road; (b) Any requirements for future flood natural hazard mitigation (c) Stormwater treatment and control.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.179	Transport	TRN - R8	Amend	The matters of discretion do not provide the ability to consider adverse environmental effects, including on indigenous biodiversity.	Add matters of discretion: - adverse effects on natural values, including those not yet identified on overlays, and the requirement to manage those effects in accordance with the Natural Environment and District Wide chapters of this Plan.
Grey District Council (S608)	S608.546	Transport	TRN - R8	Support in part	What sort of activities are expected to fall within this rule? As above, it is not clear on the purpose of the PA rule and why more activities are not considered 'maintenance'. Matters of discretion are appropriate.	Clarity
Toka Tū Ake EQC (S612)	S612.018	Transport	TRN - R8	Support	Support the councils' consideration of flood hazard mitigation	No Change
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.136	Transport	TRN - R9	Support	We support this rule.	Retain rule.
Waka Kotahi NZ Transport Agency (S450)	S450.057	Transport	TRN - R9	Support	Waka Kotahi supports this rule for the formation of an unformed legal road. The associated matters of discretion will ensure that appropriate consideration is given to the safety and efficiency of the transport system, the impact on road users and pedestrians, flood hazard mitigation, and stormwater treatment and control.	Retain as proposed.
Buller District Council (S538)	S538.081	Transport	TRN - R9	Oppose in part	As with the rules above, Council seeks that the hazard mitigation considerations are extended to natural hazards generally and a minor change to clause (a) is requested for consistency of terminology.	Amend Rule 9 as follows: Discretion is restricted to: (a) Effects on the safety and efficiency of the transport network system;(b) The ability for accessibility park users to safely and effectively park, enter and exit a vehicle;(c) The impact on other road users including

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						pedestrians;(d) Any requirements for future flood natural hazard mitigation; and(e) Stormwater treatment and control.
Chris & Jan Coll (S558)	S558.728	Transport	TRN - R9	Support		Retain
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.180	Transport	TRN - R9	Amend	The matters of discretion do not provide the ability to consider adverse environmental effects, including on indigenous biodiversity.	Add matters of discretion: - adverse effects on natural values, including those not yet identified on overlays, and the requirement to manage those effects in accordance with the Natural Environment and District Wide chapters of this Plan.
Chris J Coll Surveying Limited (S566)	S566.728	Transport	TRN - R9	Support		Retain
William McLaughlin (S567)	S567.085	Transport	TRN - R9	Support		Retain
Laura Coll McLaughlin (S574)	S574.728	Transport	TRN - R9	Support		Retain
Grey District Council (S608)	S608.547	Transport	TRN - R9	Support in part	Impact on the road controlling authority and existing infrastructure is not clear as a matter to consider. It is implied. Is the intention of this rule for developers etc to open and form unformed legal road? Matters of discretion are considered lite. c. Add cyclists Consider adding design, suitability to the matters of discretion	More explicit wording. Reword and add to as required.
Toka Tū Ake EQC (S612)	S612.019	Transport	TRN - R9	Support	We support the councils' consideration of flood hazard mitigation	No Change
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.137	Transport	TRN - R10	Support	We support this rule.	Retain rule.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Karen Lippiatt (S439)	S439.017	Transport	TRN - R10	Amend	Shared paths are a good start, but as active transport modes become more popular, council must make provision for the future separation of active modes in high use locations. In places where volume and speed of the different active modes determine, separate walking and cycling routes must be provided.	Amend as follows: Establishment of active transport routes including shared pathways, walkways, cycleways, and bridleways .
Ministry of Education Te Tāhuhu o Te Mātauranga (S456)	S456.010	Transport	TRN - R10	Support	The Ministry supports this policy as it promotes safe and efficient operation of the integrated transport network.	Retain as proposed.
Buller District Council (S538)	S538.082	Transport	TRN - R10	Oppose	As with the corresponding permitted activity rule, Council seeks the title is amended and that changes are made to the matters of discretion to broaden the assessment considerations beyond visual impacts.	Amend Rule 10 as follows: Establishment of shared pathways including cycleways and trails bridleways public land unformed legal road, Esplanade Reserves and Strips Discretion is restricted to: <ol style="list-style-type: none"> 1. Visual impacts on landscapes over 1000m above sea level Effects on cultural, heritage and natural environment values; 2. Effects on public access; and 3. Effects on the transport network.
Chris & Jan Coll (S558)	S558.729	Transport	TRN - R10	Support		Retain
Royal Forest and Bird Protection Society of New	S560.181	Transport	TRN - R10	Amend	The matters of discretion do not provide the ability to consider adverse environmental effects, including on indigenous biodiversity.	Add matters of discretion: - adverse effects on natural values, including those not yet identified on overlays, and the requirement to

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Zealand Inc. (Forest & Bird) (S560)						manage those effects in accordance with the Natural Environment and District Wide chapters of this Plan.
Chris J Coll Surveying Limited (S566)	S566.729	Transport	TRN - R10	Support		Retain
William McLaughlin (S567)	S567.086	Transport	TRN - R10	Support		Retain
Laura Coll McLaughlin (S574)	S574.729	Transport	TRN - R10	Support		Retain
Grey District Council (S608)	S608.548	Transport	TRN - R10	Support	Matters of discretion are appropriate.	REtain
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.138	Transport	TRN - R11	Support	We support this rule.	Retain rule.
Buller District Council (S538)	S538.083	Transport	TRN - R11	Oppose in part	As for the equivalent permitted activity Rule, Council seeks the removal of the qualifier of charging stations being located in the 'transport corridor'. The addition of 'safety and efficiency' is also requested to Clause (a) to provide scope to the matters of consideration while clause (b) is not expressed in terms of an assessment matter and is considered to be encompassed within clause (a).	Amend the title of Rule 11 as follows: Establishing e-bike and e-vehicle charging stations in the transport corridor a. Effects on the safety and efficiency of the transport network; and b. Outcome of consultation with the relevant transport agency
Chris & Jan Coll (S558)	S558.730	Transport	TRN - R11	Support		Retain
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.182	Transport	TRN - R11	Amend	The matters of discretion do not provide the ability to consider adverse environmental effects, including on indigenous biodiversity.	Add matters of discretion: - adverse effects on natural values, including those not yet identified on overlays, and the requirement to manage those effects in accordance with the Natural Environment and District Wide chapters of this Plan.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Chris J Coll Surveying Limited (S566)	S566.730	Transport	TRN - R11	Support		Retain
William McLaughlin (S567)	S567.087	Transport	TRN - R11	Support		Retain
Laura Coll McLaughlin (S574)	S574.730	Transport	TRN - R11	Support		Retain
Grey District Council (S608)	S608.549	Transport	TRN - R11	Support	Matters of discretion are appropriate.	Retain
Fuel Companies (S613)	S613.014	Transport	TRN - R11	Amend	Consider that it is important to have a clear permitted activity pathway to support this policy framework which doesn't differentiate where such facilities should be located.	Establishing e-bike and e-vehicle charging stations in the transport corridor not meeting Permitted Activity standards Activity Status Restricted Discretionary Discretion is restricted to: a. Effects on the transport network; and b. Outcome of consultation with the relevant transport agency. c. Effects on amenity values.
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.139	Transport	TRN - R12	Support	We support this rule.	Retain rule.
Suzanne Hills (S443)	S443.017	Transport	TRN - R12	Oppose	This restricted discretionary activity applies to high trip generating transport activities defined for mining and quarrying as 30+ hvm/d. It does not consider how cumulative effects of several mining or quarrying activities (that individually may generate less than 30hvm/d) will be adequately mitigated.	Reconsider this rule and TRN S14 regarding cumulative effects from heavy vehicle movements.
Waka Kotahi NZ Transport Agency (S450)	S450.058	Transport	TRN - R12	Support in part	Waka Kotahi supports the rule as it provides for a restricted discretionary activity status for activities that breach the high trip generating threshold in Table TRN 6. However, there is confusion with	Amend TRN-R12 and TRN-R14 to ensure there is clarity on the activity status of the activity prior to submitting a consent application.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					how this rule works in conjunction with TRN-14 which provides a discretionary status for high trip generating activities not meeting TRN-R12. At this stage it is difficult to understand whether you are a restricted discretionary or a discretionary activity until it has been assessed by Council as there is no clear delineation in the transport standards or the rule. How to appropriately apply the standards is also open to interpretation. It is recommended that the rule and/or standards be amended to ensure that there is clarity on the activity status between TRN-R12 and TRN-R14.	
Ministry of Education Te Tāhuhu o Te Mātauranga (S456)	S456.011	Transport	TRN - R12	Support	The Ministry supports the need for traffic assessments where an activity meets the qualifiers set out in Table TRN-6,	Retain as proposed
Bathurst Resources Limited and BT Mining Limited (S491)	S491.010	Transport	TRN - R12	Amend	Clear that vehicle movements is to and from the site and not within the site.	<p>Amend: Mining and Quarrying >30 heavy vehicle movements to or from the site per day
Buller District Council (S538)	S538.084	Transport	TRN - R12	Oppose in part	<p>Council considers Rule 12 confusing given it does not explicitly state that it covers high trip generating activities that exceed the thresholds in Table TRN 6.</p> <p>Clause 1 also requires compliance with Standard TRN S14 which are assessment requirements rather than explicit standards which Council can assess an activity against. Council seeks that Rule 12 is amended to provide clarity on when the rule applies and that the matters of discretion include the Standard TRN S14 requirements, but in a summarised form.</p>	<p>Amend Rule 12 as follows:</p> <p>Activity Status Restricted Discretionary Where:</p> <p>1. This is the establishment of a new activity or the expansion of an existing activity that exceeds the thresholds listed in Table TRN 6 that complies with Standard TRN S14.</p> <p>Discretion is restricted to:</p> <p>(a) Effects on the transport network including whether the use or development compromise the safety and efficiency of the transport network:</p> <p>b) Effects and recommendations to</p>

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					With these amendments, there would be no need for another tier of activity status and the reference to Discretionary activities where compliance with the rule is not achieved.	<p>minimise effects from the transport assessment. Any recommendations in a transport assessment provided by a suitably qualified and experienced transport professional; c) The extent to which vehicle access, parking and maneuvering areas associated with the activity are provided; and d) The nature of the activity and compatibility with the function and purpose of the underlying zone.</p> <p>Consequential amendments - delete Standard TRN S14 and remove the reference to 'Discretionary' for activities which do not comply with the rule.</p>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.183	Transport	TRN - R12	Amend	The matters of discretion do not provide the ability to consider adverse environmental effects, including on indigenous biodiversity.	Add matters of discretion: - adverse effects on natural values, including those not yet identified on overlays, and the requirement to manage those effects in accordance with the Natural Environment and District Wide chapters of this Plan.
Fire and Emergency New Zealand (S573)	S573.011	Transport	TRN - R12	Oppose in part	Fire and Emergency request that emergency service facilities have no limit on traffic movements imposed. As the table currently reads, FENZ would come under the Mixed Use or other activities not otherwise listed. As vehicle movements are unable to be determined, require consent as a restricted discretionary activity when establishing an emergency service facility in all zones under TRAN-R12. Fire and Emergency seeks relief through other provisions in the plan to ensure the	Amendment sought:

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					<p>establishment of emergency service facilities, are enabled as a permitted activity. New fire stations may be necessary in order to continue to achieve emergency response time commitments in stations where development occurs, and populations change. In this regard it is noted that Fire and Emergency is not a requiring authority under section 166 of the RMA, and therefore does not have the ability to designate land for the purposes of fire stations.</p> <p>Fire and Emergency considers that amending the thresholds set out in Table 6 provides for emergency service facilities in all zone as a permitted activity. This will better provide for health and safety of the community by enabling the efficient functioning of Fire and Emergency in establishing and operating fire stations</p>	
Grey District Council (S608)	S608.550	Transport	TRN - R12	Support	<p>This is the first mention of "high trip activities".</p> <p>Also, this term is not included as a definition. Use "mitigate" rather than "minimise" to allow less opportunity for interpretation.</p>	Having something earlier, whether a rule or policy would ensure it doesn't go unnoticed as part of an application. Include as a definition. Re-word as required.
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.140	Transport	TRN - R13	Support	We support this rule.	Retain rule.
Waka Kotahi NZ Transport Agency (S450)	S450.059	Transport	TRN - R13	Support in part	Remove reference to 'not meeting permitted activity standards' in the heading as TRN-R4 is not required as a permitted activity, as per submission point above.	Amend the heading of the rule as follows: Formation of a new Transport Corridor not meeting Permitted Activity standards

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Buller District Council (S538)	S538.085	Transport	TRN - R13	Oppose in part	Rule 13 includes a statement on notification. Council is concerned with pre-determining the notification decision and considers this should be assessed at the application stage based on the merits of a proposal and requests this statement is removed.	Amend Rule 13 as follows: Notification: Applications will always be publicly notified.
Chris & Jan Coll (S558)	S558.731	Transport	TRN - R13	Amend	We do not believe that application should always be notified.	Delete Notification advice note.
Chris J Coll Surveying Limited (S566)	S566.731	Transport	TRN - R13	Amend	We do not believe that application should always be notified.	Delete Notification advice note.
William McLaughlin (S567)	S567.088	Transport	TRN - R13	Amend	We do not believe that application should always be notified.	Delete Notification advice note.
Laura Coll McLaughlin (S574)	S574.731	Transport	TRN - R13	Amend	We do not believe that application should always be notified.	Delete Notification advice note.
Grey District Council (S608)	S608.551	Transport	TRN - R13	Support in part	Given TRN-R4, which is not clear, it is not obvious what activity will be captured by this DA rule?	Clarification on the requirements for Council when considering the creation of a new road and formed vs unformed roads.
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.141	Transport	TRN - R14	Support	We support this rule.	Retain rule.
Buller District Council (S538)	S538.086	Transport	TRN - R14	Oppose	Council seeks the removal of Rule 14 for the reasons discussed above.	Delete Rule 14.
Chris & Jan Coll (S558)	S558.732	Transport	TRN - R14	Amend	We do not believe these should always publicly notified. This should be deleted from the rule.	Amend as follows: Notification: Applications will always be publicly notified.
Chris J Coll Surveying Limited (S566)	S566.732	Transport	TRN - R14	Amend	We do not believe these should always publicly notified. This should be deleted from the rule.	Amend as follows: Notification: Applications will always be publicly notified.
William McLaughlin (S567)	S567.089	Transport	TRN - R14	Amend	We do not believe these should always publicly notified. This should be deleted from the rule.	Amend as follows: Notification: Applications will always be publicly notified.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Laura Coll McLaughlin (S574)	S574.732	Transport	TRN - R14	Amend	We do not believe these should always publicly notified. This should be deleted from the rule.	Amend as follows: Notification: Applications will always be publicly notified.
Buller District Council (S538)	S538.070	Transport	Advice Notes:	Support in part	Council seeks a minor change to Advice Note 2. Any works within transport corridors require approval from the relevant road controlling authority and this is not limited to road opening activities. Council seeks that this is reflected in the Advice Note so that plan users are alerted to the fact that additional approvals may be necessary for activities within road reserve/transport corridors.	Amend Advice Note 2 as follows: Works undertaken in a road reserve/transport corridor or areas subject to a District Council designation also require road open relevant road controlling authority - District Council or Waka Kotahi, or KiwiRail.
KiwiRail Holdings Limited (S442)	S442.004	Infrastructure	Other relevant Te Tai o Poutini Plan provisions	Amend	Land transport infrastructure is a term that is used within the Proposed Plan but is not defined. To ensure the plan is interpreted correctly, KiwiRail seeks that this term is defined and that the rail network is included in this definition. The relief sought takes direction from the definition of Land Transport and Infrastructure within the West Coast Regional Land Transport Plan 2021-2031.	Insert as follows: Land Transport Infrastructure means the infrastructure, goods and services facilitating transport on land by any means. This includes coastal shipping and all fixed components of a transportation system, including roadways and bridges, railways, ports, cycle trails and other physical elements.
Ministry of Education Te Tāhuhu o Te Mātauranga (S456)	S456.013	Transport	TRN Table 5	Support	The Ministry supports the encouragement of active transport modes such as cycling, walking and the overall encouragement of cycle parking.	Retain as proposed.
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.113	Transport	Overview	Support	Te Mana Ora supports all the objectives and policies within this section. The West Coast is becoming a destination region for cycle tourism. However, it is important that transport infrastructure also supports locals to walk and cycle for everyday activities, connectivity, and wellbeing. Residents called for better cycling and walking infrastructure when providing	Retain

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					feedback to the Regional Survey. Moreover, the 2018 Census showed that the percentage of West Coast people who walked or jogged to work (8%) was higher than the national figure of 5.2%, while the percentage of those who biked was equal to the national figure of 2%.	
Manawa Energy Limited (Manawa Energy) (S438)	S438.032	Energy	Overview	Support in part	Manawa strongly supports the separation of the ENG and INF chapters of the Plan. It considers that this provides a necessary degree of transparency for Plan users, and avoids duplication and confusion between the ENG and INF chapters.	Retain the statement at the end of the Overview section that clearly outlines the relationship between the ENG and INF chapters, as notified. If possible, Manawa requests that this statement differentiated from the remainder of the overview text (by use of font, bolding etc) to make this key information clearer.
Manawa Energy Limited (Manawa Energy) (S438)	S438.034	Energy	Overview	Support in part	The first sentence of the Overview incorrectly refers to all energy activities being recognised as regionally significant infrastructure in the West Coast Regional Policy Statement. Manawa requests that this section is amended to correct this error.	Delete the words 'Energy activities including' from the first sentence of the Overview section as follows: Energy activities, including # Renewable electricity generation, transmission, distribution and operation are recognised as regionally significant infrastructure in the West Coast Regional Policy Statement.
Manawa Energy Limited (Manawa Energy) (S438)	S438.058	Infrastructure	Overview	Support	Manawa supports the clarification of the interrelationship between the INF and ENG chapters of the Plan. It considers that this provides clarity for Plan users and will aid in the efficient administration of the Plan.	Retain the third sentence of the fourth paragraph of the Overview as notified.
Frank and Jo Dooley (S478)	S478.076	Energy	Overview	Support	Buller Electricity supports the overview in the energy section of the Energy Infrastructure and Transport Chapter.	It is suggested that a comma between Energy and Infrastructure is appropriate - Energy, Infrastructure and Transport Chapter.
Royal Forest and Bird Protection Society of New	S560.170	Transport	Overview	Amend	The scope and relationship of the chapter to other chapters is somewhat unclear.	Clarify the relationship between the transport provisions in this chapter and other district wide topic chapters.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Zealand Inc. (Forest & Bird) (S560)						
Frank and Jo Dooley (S478)	S478.092	Energy	Permitted Activities	Amend	It is unclear whether underground electricity transmission lines are a permitted activity in the proposed TTPP.	Make it clear that underground electricity transmission lines are a permitted activity