



**Plan Sections: HCV – Historical and Cultural Values**  
**Historic Heritage, Notable Trees, Sites and Areas of Significance to Māori, Natural Environment Values, Ecosystems and Indigenous Biodiversity, Natural Features and Landscapes, Public Access, Natural Character and Margins of Waterbodies**

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](http://www.ttpn.nz)

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Westpower Limited (S547)	S547.311	Natural Character and Margins of Waterbodies		Amend	The overview makes little comment in regard to the needs for certain activities to be located in or through margins. Given the topography and conditions on the West Coast this is a matter that should be recognised as an element of the environment. As raised in previous chapters there is no identification or discussion of Strategic Objectives and Policies	<b>(1) Amend the "Overview" by adding a paragraph,"There is a considerable network of energy activities and infrastructure, including critical infrastructure, on the West Coast that services the communities spread throughout the region and in to neighbouring regions. Such activities have been, and will continue to be, developed and undertaken recognising and taking into account the local conditions. Given the topography and extent of waterbodies and landscapes on the West Coast practical management solutions are required to ensure maintenance and enhancement of the supply of renewable energy to, and between, communities for the benefit of those communities and the wider environment from the use and development of renewable energy. The National Policy Statement for Renewable Electricity Generation also recognises the constraints and requirements of such activities including, amongst other matters, being located where the resource is."(2) Add</b>

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						<b>references to Strategic Objectives and Policies as per previous chapters.</b>
Westland District Council (S181)	S181.064	HCV - Historical and Cultural Values	HCV - Historical and Cultural Values	Support	Westland District Council supports these Objectives, Policies and Rules	Retain historical and cultural values objectives, policies and rules.
David Marshall (S347)	S347.004	HCV - Historical and Cultural Values	HCV - Historical and Cultural Values	Support	The zoning of Historic Areas gives needed protection to more recent historical sites of significance. Legislation need to remain flexible for volunteers working these sites because if people-power is not encouraged, no amount of paperwork will stop them falling prone to time and the weather.	Implementation of the TTPP plan Historical and Cultural Values. This should remain open with clear processes for the addition of future sites. It is VERY important that legislation be flexible enough to make it easy for any potential small community groups to manage these areas. This should be taken into account on any case-by-case decision making.
G.E. and C.J. Coates on behalf of Nikau Deer Farm Limited (S415)	S415.001	HCV - Historical and Cultural Values	HCV - Historical and Cultural Values	Oppose		Delete provisions
Rocky Mining Limited (S474)	S474.033	HCV - Historical and Cultural Values	HCV - Historical and Cultural Values	Amend		seek recognition within all overlay chapters that mineral extraction has a functional and operational need to locate where the resource is, and that this functional and operational need be given due consideration in resource consent applications within the specific overlay;
Rocky Mining Limited (S474)	S474.036	HCV - Historical and Cultural Values	HCV - Historical and Cultural Values	Amend		seek that directive overlay provisions seeking to "avoid, protect, prevent" or "minimise, restrict and preserve" should be limited to situations where they are warranted (i.e. for significant adverse effects, or in environments meeting significance criteria (such as SASM or Significant Natural Areas)) because they can be problematic for passing the gateway test;
Rocky Mining Limited (S474)	S474.040	HCV - Historical and Cultural Values	HCV - Historical and Cultural Values	Amend		seek that overlay chapters contain a restricted discretionary rule for mining, with discretion restricted to effects on the specific overlay or

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						overlay values;
Papahaua Resources Limited (S500)	S500.022	HCV - Historical and Cultural Values	HCV - Historical and Cultural Values	Amend		seek recognition within all overlay chapters that mineral extraction has a functional and operational need to locate where the resource is, and that this functional and operational need be given due consideration in resource consent applications within the specific overlay;
Papahaua Resources Limited (S500)	S500.025	HCV - Historical and Cultural Values	HCV - Historical and Cultural Values	Amend		seek that directive overlay provisions seeking to "avoid, protect, prevent" or "minimise, restrict and preserve" should be limited to situations where they are warranted (i.e. for significant adverse effects, or in environments meeting significance criteria (such as SASM or Significant Natural Areas)) because they can be problematic for passing the gateway test;
Papahaua Resources Limited (S500)	S500.027	HCV - Historical and Cultural Values	HCV - Historical and Cultural Values	Amend		overlay chapters contain a restricted discretionary rule for mining, with discretion restricted to effects on the specific overlay or overlay values;
Tangi Weepu (S630)	S630.002	HCV - Historical and Cultural Values	HCV - Historical and Cultural Values	Amend		Include historical and cultural values, and areas of significance to Maori as raised in verbal submission
KiwiRail Holdings Limited (S442)	S442.048	Historic Heritage	HH	Amend	KiwiRail seeks the inclusion of a new policy which recognises that there may instances where there is an operational or functional need for critical infrastructure to be located within a heritage setting.	Insert as follows: <b>Only allow new infrastructure on or within heritage items, heritage settings and historic heritage sites, identified in Schedule One where it can be demonstrated that: There is an operational need or functional need that means the infrastructure's location cannot be avoided; and The new infrastructure will protect and maintain the particular heritage and/or cultural values of that building, site, area, item and/or feature.</b>
Heritage New Zealand Pouhere Taonga (S140)	S140.080	Historic Heritage	Historic Heritage	Support in part	Te Tai Poutini West Coast has a wealth of unique and important history. This plays a central role in generating a feeling of identity and wellbeing, as well	HNZPT seeks amendments to strengthen and clarify provisions within the Proposed Plan as they relate to the management and protection of

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					as encouraging intergenerational connection. The identification and protection of important historic heritage items can enhance the value and appreciation of the district to those who live and work there as well as to those who visit, in many cases also generating economic benefits. We therefore consider the appropriate management of the region's finite heritage resources to be essential. dequate resource management requires a clear strategic direction relating to heritage protection backed by robust, unambiguous rules. It also requires sufficient information for identified heritage items to justify their inclusion in the Plan, to promote understanding of their values and to enable decisions to be well informed. HNZPT submits that the provisions of the Proposed Plan only go part way to meeting those requirements.	historic heritage.
Westland District Council (S181)	S181.013	Historic Heritage	Historic Heritage	Support	Westland District Council supports these Objectives, Policies and Rules	Retain the objectives, policies and rules
Rocky Mining Limited (S474)	S474.006	Historic Heritage	Historic Heritage	Amend		Seek a restricted discretionary rule in the overlay chapters for mineral extraction, or at minimum activities with a functional and operational need - discretion should be restricted to the values of the particular overlay.
Greymouth Heritage Trust (S104)	S104.007	Historic Heritage	Overview	Amend	There appears to be no guidelines that provide instruction for adding Heritage items or defining what a Heritage item is. Guidelines would save a lot of time in that people would then know what is accepted as heritage places.	That the Plan Include a statement that provides guidelines on how and when heritage sites / buildings can be added to the Plan and what attributes are required before a site or building would make it onto the plans Heritage List
Heritage New Zealand Pouhere Taonga (S140)	S140.015	Historic Heritage	Overview	Oppose in part	HNZPT supports the inclusion of advisory notes regarding archaeology in the overview of the Historic Heritage chapter	HNZPT requests the wording be amended:' <b>Under the Heritage New Zealand PouhereTaonga Act 2014</b> , Archaeological sites

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					<p>- firstly providing the definition of an archaeological site and secondly explaining responsibilities under the HNZPT Act 2014. Owners or applicants may not fully understand the definition of an archaeological site or that a resource consent does not automatically allow the activities to occur on such a site. This clarification is important to ensure that archaeological sites are not damaged through lack of understanding. However, we request some clarification regarding the pre-1900 date. Although the HNZPTA 2014 defines an archaeological site as that associated with human activity that occurred before 1900, the RMA does not identify such a timeframe. We promote that the Te Tai o Poutini Plan should enable protection of all archaeological sites within Schedule One regardless of date.</p>	<p>are any place in Aotearoa New Zealand (including buildings and structures) that are associated with pre-1900 human activity, where there is evidence relating to the history of New Zealand that can be investigated using archaeological methods. There are a large number of archaeological sites identified in the West Coast/Te Tai o Poutini. While all pre-1900 archaeological sites are protected under Heritage New Zealand Pouhere Taonga Act 2014, archaeological sites of particular significance to the community on the West Coast/Te Tai o Poutini are included in Schedule One and the Historic Heritage rules also apply to these archaeological sites. <b>This schedule can also contain post-1900 sites which have archaeological significance.</b> Alongside this, the New Zealand Archaeological Association has identified a list of archaeological sites of Māori origin. These are included in Appendix Ten for information.'</p>
Heritage New Zealand Pouhere Taonga (S140)	S140.016	Historic Heritage	Overview	Amend	<p>When archaeological sites are referred to as 'site', e.g., in the Historic Heritage chapter overview, the automatic definition box provides the National Planning Standard definition (i.e., area of land under a single title etc). This is not the correct definition of the word in relation to an archaeological site and is therefore misleading. This could be overcome by not using the abbreviation 'site', but rather always using the full term 'archaeological site'.</p>	<p>HNZPT requests that in relation to archaeology, any reference to 'site' is removed and the full term 'archaeological site' is always used.</p>
Heritage New Zealand Pouhere Taonga (S140)	S140.017	Historic Heritage	Overview	Amend	<p>The Proposed Plan provides the National Planning Standard definition for 'earthworks', however this definition is incorrect when referencing the Heritage</p>	<p>HNZPT requests the wording be amended: 'If you discover a previously unknown archaeological site (for example, when you are undertaking earthworks) you must stop any</p>

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					New Zealand Pouhere Taonga Act 2014 because it is too narrow - specifically, earthworks in the NPS definition 'excludes gardening, cultivation, and disturbance of land for the installation of fence posts', but the HNZPTA 2014 refers to any 'activity that will or may modify or destroy'. HNZPT therefore requests that when referring to the HNZPTA 2014, the term 'works' or 'works within an archaeological site' is used rather than 'earthworks'.	work that could affect the <b>archaeological</b> site and contact HNZPT for advice on how to proceed.
Grey District Council (S608)	S608.010	Historic Heritage	Overview	Amend	SASM reference is removed	Remove reference to "Site or Area of Significance to Māori"
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.100	Historic Heritage	Overview	Amend	To clarify for the plan user that all the schedules contribute to the historic heritage of the West Coast/Te Tai o Poutini	Include the following changes or changes to this affect to paragraph 7: Archaeological sites.... are protected under Heritage New Zealand Pouhere Taonga Act 2014, archaeological sites <b>predominately related to European colonial history</b> of particular significance to the community on the West Coast/Te Tai o Poutini are included in Schedule One and the Historic Heritage rules also apply to these archaeological sites. <b>The archaeological sites listed in Schedule One, while an important part of the history of the West Coast/Te Tai o Poutini are not the full list. Alongside this, the New Zealand Archaeological Association has identified a list of archaeological sites of Māori origin. Further investigation is required to ensure the exact spatial location and extent of some of these sites, therefore these</b> sites are included in Appendix Ten for information and <b>awareness to plan users, particularly resource consent applicants, of the increased likelihood of discovering</b>

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						archaeological material of Māori origin in the vicinity of these areas. Appendix 10 will be mapped and included as an 'Alert Layer' on the e-plan maps. The Councils will continue to work with both Heritage New Zealand Pouhere Taonga and Poutini Ngāi Tahu over the next ten years to ensure that the archaeological sites of Māori origin are accurately mapped before being considered for inclusion in Schedule One via a plan change. Historic heritage and archaeological sites are also important to Poutini Ngāi Tahu for values other than Historic heritage. Some of ....
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.151	Historic Heritage	Overview	Amend	The changes sought are to clarify for the plan user that all the schedules contribute to the historic heritage of the West Coast/Te Tai o Poutini	Include the following changes to paragraphs 5 and 8: Historic Heritage items are listed in Schedule One, <b>Schedule two and Schedule Three. Schedule One predominately covers the built and colonial heritage and also this schedule also</b> identifies if there are any interior elements of a heritage building that are also protected. <b>Schedule Two covers important notable and heritage trees to the community and Schedule Three reflects Poutini Ngāi Tahu heritage.</b> Historic areas area also identified .... Where a site is scheduled in multiple locations, the provisions of all chapters must be considered. <b>Some objectives and policies of this chapter also apply to sites list only in schedule two or three.</b>
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.152	Historic Heritage	Overview	Amend	The changes sought are to clarify why these sites are currently included in Appendix 10 and not in Schedule One.	Include the following changes or changes to this affect to paragraph 7: Archaeological sites.... are protected under Heritage New Zealand Pouhere Taonga Act 2014, archaeological sites <b>predominately related to European colonial history</b> of particular significance to the community on the West Coast/Te Tai o Poutini are included in Schedule One and the Historic Heritage rules also

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						<p>apply to these archaeological sites. <b>The archaeological sites listed in Schedule One, while an important part of the history of the West Coast/Te Tai o Poutini are not the full list. Alongside this, the New Zealand Archaeological Association has identified a list of archaeological sites of Māori origin. Further investigation is required to ensure the exact spatial location and extent of some of these sites, therefore these sites are</b> included in Appendix Ten for information <b>and awareness to plan users, particularly resource consent applicants, of the increased likelihood of discovering archaeological material of Māori origin in the vicinity of these areas. Appendix 10 will be mapped and included as an 'Alert Layer' on the e-plan maps. The Councils will continue to work with both Heritage New Zealand Pouhere Taonga and Poutini Ngāi Tahu over the next ten years to ensure that the archaeological sites of Māori origin are accurately mapped before being considered for inclusion in Schedule One via a plan change.</b></p> <p>Historic heritage and archaeological sites are also important to Poutini Ngāi Tahu <b>for values other than Historic heritage.</b> Some of ....</p>
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.101	Historic Heritage	Other relevant Te Tai o Poutini Plan provisions	Amend	We are concerned with the way the NZAA sites of Māori origin are referred to in this 'Overview' section	<p>Include the following wording: ....</p> <p>Appendix Ten - This appendix contains NZAA listed archaeological sites of Māori origin. The exact spatial location and extent of these sites has not yet been clearly identified but they are included in this appendix for information purposes <b>and are a matter for consideration where resource consent is required for an activity that may impact on an archaeological site. Appendix 10 will be</b></p>



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						<b>mapped and included as an "Alert Layer" in the e-planning maps.</b> Like all archaeological sites, these <b>sites</b> are protected under the Heritage New Zealand Pouhere Taonga Act 2014.
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.153	Historic Heritage	Other relevant Te Tai o Poutini Plan provisions	Amend	The changes sought are to clarify why these sites are currently included in Appendix 10 and not in Schedule One.	<p>Include the following wording: ....</p> <ul style="list-style-type: none"> <li>• Notable Trees - the Notable Trees Chapter contains the provisions in relation to the trees identified in <del>Schedule Two</del> <b>in Schedule Two</b> ...</li> <li>• Appendix Ten - This appendix contains NZAA listed archaeological sites of Māori origin. The exact spatial location and extent of these sites has not yet been clearly identified but they are included in this appendix for information purposes <b>and are a matter for consideration where resource consent is required for an activity that may impact on an archaeological site. Appendix 10 will be mapped and included as an "Alert Layer" in the eplanning maps.</b> Like all archaeological sites, these <b>sites</b> are protected under the Heritage New Zealand Pouhere Taonga Act 2014.</li> </ul>
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.392	Historic Heritage	Other relevant Te Tai o Poutini Plan provisions	Amend	Typo	<ul style="list-style-type: none"> <li>• Notable Trees - the Notable Trees Chapter contains the provisions in relation to the trees identified in <del>Schedule Two</del> in Schedule Two</li> </ul>
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.102	Historic Heritage	Other relevant Statutory Provisions	Amend	We are concerned with the way the NZAA sites of Māori origin are referred to in this 'Overview' section.	<p>Amend to include the following wording:</p> <p>...If you discover a previously unknown archaeological site (for example, when you are undertaking earthworks) you must stop any work that could affect the site and contact HNZPT for advice on how to proceed. If there are <del>human remains</del> <b>kōiwi or taonga</b> revealed, then the Accidental Discovery Protocol in Appendix <del>Five</del> <b>Four</b> must be followed and if any artefacts are</p>

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						found they must be handed over to the Ministry for Culture and Heritage.
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.154	Historic Heritage	Other relevant Statutory Provisions	Amend	The changes sought are to clarify why these sites are currently included in Appendix 10 and not in Schedule One.	Amend with the following wording: ...If you discover a previously unknown archaeological site (for example, when you are undertaking earthworks) you must stop any work that could affect the site and contact HNZPT for advice on how to proceed. If there are <del>human remains</del> <b>kōiwi or taonga</b> revealed, then the Accidental Discovery Protocol in Appendix <del>Five</del> <b>Four</b> must be followed and if any artefacts are found they must be handed over to the Ministry for Culture and Heritage.
Buller District Council (S538)	S538.164	Historic Heritage	Historic Heritage Objectives	Support	Council supports the objectives and policies for Historic Heritage	Retain as notified.
Chris & Jan Coll (S558)	S558.064	Historic Heritage	Historic Heritage Objectives	Support		Retain
Chris J Coll Surveying Limited (S566)	S566.064	Historic Heritage	Historic Heritage Objectives	Support		Retain
William McLaughlin (S567)	S567.149	Historic Heritage	Historic Heritage Objectives	Support		Retain
Laura Coll McLaughlin (S574)	S574.064	Historic Heritage	Historic Heritage Objectives	Support		Retain
David Ellerm (S581)	S581.019	Historic Heritage	Historic Heritage Objectives	Support	Support Historic Heritage Objectives	Retain
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.230	Historic Heritage	HH - O1	Support	We strongly support this objective which acknowledges the importance of wellbeing for good public health outcomes.	Retain objective.
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae,	S620.103	Historic Heritage	HH - O1	Support	Historic Heritage contributes to a community's sense of identity and knowledge of where it comes from.	Retain as notified

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Te Runanga o Makaawhio (S620)						
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.155	Historic Heritage	HH - O1	Support	Historic Heritage contributes to a community's sense of identity and knowledge of where it comes from.	Retain as notified
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.231	Historic Heritage	HH - O2	Support	We support this objective.	Retain objective.
Manawa Energy Limited (Manawa Energy) (S438)	S438.062	Historic Heritage	HH - O2	Support	Manawa schemes incorporate a range of heritage items and protect these insitu including providing for ongoing use of these as part of the hydroelectricity schemes. On this basis, Manawa supports Objective 2 in that it provides for development sensitive to identified values.	Retain HH - O2 as notified.
Westpower Limited (S547)	S547.170	Historic Heritage	HH - O2	Amend	The issue of "appropriateness" should be added to the objective.	Amend: Provide for development opportunities ... while providing for the protection of these values <b>from inappropriate subdivision, use, and development</b> .
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.232	Historic Heritage	HH - O3	Support	We support this objective.	Retain objective.
Westpower Limited (S547)	S547.171	Historic Heritage	HH - O3	Amend	The issue of "appropriateness" should be added to the objective.	Identify, assess and recognise historic heritage ... to ensure their protection <b>from inappropriate subdivision, use, and development</b> for future generations.
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae,	S620.104	Historic Heritage	HH - O3	Support	The wording of this objective applies equally to both colonial and Poutini Ngāi Tahu history.	Retain as notified

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Te Runanga o Makaawhio (S620)						
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.233	Historic Heritage	HH - O4	Support	We support this objective.	Retain objective.
KiwiRail Holdings Limited (S442)	S442.047	Historic Heritage	HH - O4	Amend	KiwiRail supports provisions that seek to protect historic heritage. There are a number of heritage items within the rail corridor and KiwiRail seeks amendment to this objective to recognise the functional and operational need of infrastructure.	Amend as follows: Protect historic heritage by restricting relocation, repositioning, internal and external alterations and additions to heritage items and not allowing demolition and destruction , <b>while recognising the functional or operational need of infrastructure.</b>
Westpower Limited (S547)	S547.172	Historic Heritage	HH - O4	Amend	Allow certain types of use and development.	Protect historic heritage <b>from inappropriate subdivision, use, and development</b> by <b>managing</b> relocation, repositioning, ... heritage items and not allowing demolition and destruction <b>where sustainable alternatives exist.</b>
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.105	Historic Heritage	HH - O4	Support	Recognise that to protect historic heritage that it may need to be moved (where appropriate) due to climate change and natural hazards.	Retain as notified
Greymouth Heritage Trust (S104)	S104.009	Historic Heritage	Historic Heritage Policies	Amend	Some modern activities and buildings will be the heritage areas and items of the future. These need to be identified now for example some current mining activity may provide for future heritage assets if "remedial" works did not completely eradicate signs of the activity. Or a new building could be identified now as being a significant representation of its type and purpose so that it gets identified as being worthy of keeping in its current "look" for the future.	That the Plan promotes the identification of human activity in the now that will become Heritage assets in the future.

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Buller District Council (S538)	S538.165	Historic Heritage	Historic Heritage Policies	Support	Council supports the objectives and policies for Historic Heritage	Retain as notified.
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.234	Historic Heritage	HH - P1	Support	We support this policy.	Retain policy.
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.235	Historic Heritage	HH - P2	Support	We support this policy.	Retain policy.
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.106	Historic Heritage	HH - P2	Support	Only by councils working closely in partnership with mana whenua will these important historical places be able to be identified.	Retain as notified
Heritage New Zealand Pouhere Taonga (S140)	S140.018	Historic Heritage	HH - P3	Support	HNZPT supports the clarification of criteria to be used when assessing items for inclusion within SCHED1. This will assist owners and other Plan users to understand why a building or structure has been scheduled and what heritage values it holds.	Retain policy as proposed
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.236	Historic Heritage	HH - P3	Support	We support this policy.	Retain policy.
Heritage New Zealand Pouhere Taonga (S140)	S140.019	Historic Heritage	HH - P4	Support	The conservation of a heritage building is usually facilitated by the place serving a useful purpose and for this reason, HNZPT actively promotes adaptive reuse. Such development has potential to elongate the life of a heritage item, which may otherwise be unviable. HNZPT therefore supports policy HH-P4 which seeks to enable the use, including adaptive reuse, of scheduled historic	Retain policy as proposed

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					heritage items, while ensuring that their identified values are maintained.	
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.237	Historic Heritage	HH - P4	Support	We support this policy.	Retain policy.
Manawa Energy Limited (Manawa Energy) (S438)	S438.063	Historic Heritage	HH - P4	Support in part	Manawa supports the enabling provisions of this policy. It is considered that reference should be added to the maintenance of identified heritage values 'where practicable' to recognise different contexts in which heritage items may be utilised and other considerations associated with this use (such as health and safety matters). In some cases, the continued use of heritage items will not enable maintenance to the fullest extent.	Amend HH - P4 as follows: Enable the use, including adaptive reuse of historic heritage items identified in Schedule One, while ensuring that their identified values are maintained, <b>where practicable</b> .
Heritage New Zealand Pouhere Taonga (S140)	S140.021	Historic Heritage	HH - P5	Amend	HNZPT supports the principle of policy HH-P5 but considers that alterations for the primary purpose of improving structural performance, fire safety or physical access, should also where possible, be undertaken in a way that does not detract from an item of historic heritage value. The relevant rule, HH-R2, adequately addresses this. We therefore request the removal of point b) in the policy as it misleadingly indicates that these alterations may not need to meet with part a).	HNZPT requests the wording of policy HH-P5 be amended: 'When considering proposals for external alteration of historic heritage items identified in Schedule One, the following matters shall be considered: a) Any external alteration will not significantly detract from an item of historic heritage value; <b>or b) The alterations are for the primary purpose of improving structural performance, fire safety or physical access.</b> '
Northern Buller Communities Society Incorporated (S142)	S142.002	Historic Heritage	HH - P5	Support	In favour of principals	None stated
Te Mana Ora (Community and Public Health) of the	S190.238	Historic Heritage	HH - P5	Support	We support this policy.	Retain policy.

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NPHS/ Te Whatu Ora (S190)						
Manawa Energy Limited (Manawa Energy) (S438)	S438.064	Historic Heritage	HH - P5	Support in part	Manawa considers that external alterations to a heritage resource may be required to enable continued use of that resource, or for maintenance and repair purposes. It is recommended that the policy is amended to provide for these purposes.	Amend HH - P5 as follows: When considering proposals for external alteration of historic heritage items identified in Schedule One, the following matters shall be considered: a.Any external alteration will not significantly detract from an item of historic heritage value; or b.The alterations are for the primary purpose of improving structural performance, fire safety or physical access.; or <b>c.The alterations are required to enable the continued use of the item, or</b> <b>d.The alterations are required for maintenance or repair purposes.</b>
Westpower Limited (S547)	S547.173	Historic Heritage	HH - P5	Amend	regarding use and supply of renewable energy.	Amend b. The alterations are for the primary purpose of ... fire safety, physical access <b>or the supply and use of energy.</b>
Heritage New Zealand Pouhere Taonga (S140)	S140.022	Historic Heritage	HH - P6	Amend	HNZPT supports the principle of policy HH-P6 but submits that, as the Councils are unlikely to have inhouse heritage expertise, consideration of the seven points should be undertaken by a suitably qualified heritage professional.	HNZPT requests the wording of policy HH-P6be amended:'When considering proposals for relocationor repositioning of historic heritage itemsidentified in Schedule One, the followingmatters shall be <del>considered</del> <b>assessed by a suitably qualified heritage professional:...</b>
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.239	Historic Heritage	HH - P6	Support	We support this policy.	Retain policy.
Westpower Limited (S547)	S547.174	Historic Heritage	HH - P6	Amend	To consider the reason for potential relocation or repositioning in relation to energy activities.	<b>Add h. Any technical, locational, functional or operational constraints or requirements of energy activities."</b>

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Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.107	Historic Heritage	HH - P6	Amend	To include the impacts on Poutini Ngai Tahu values as a matter of consideration	Include the following wording: When considering proposals for relocation or repositioning of historic heritage items or sites identified in Schedule One, the following matters shall be considered: <b>...h. The impacts on Poutini Ngai Tahu values on any item, site or area of significance to Māori</b>
Northern Buller Communities Society Incorporated (S142)	S142.003	Historic Heritage	HH - P7	Support	In favour of principals	None stated
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.240	Historic Heritage	HH - P7	Support	We support this policy.	Retain policy.
Manawa Energy Limited (Manawa Energy) (S438)	S438.065	Historic Heritage	HH - P7	Support in part	Manawa considers that public safety risk and the efficient functioning of regionally significant infrastructure are matters which should be considered in relation to this issue. It is recommended that the policy is amended to provide for these purposes.	Amend HH - P7 as follows: Demolition and destruction of historic heritage items identified in Schedule One will not be allowed unless it can be demonstrated, through investigation and assessment by a suitably qualified heritage professional that: a The extent of the work required to retain the heritage items is of such a scale that the heritage values and integrity of the heritage item would be significantly compromised; b The costs to retain or repair the heritage item would be unreasonable; c All other viable alternatives, including relocation and repositioning have been fully considered-; <b>d The item poses a significant risk to public safety; e the item is adversely affecting the efficient functioning or operation of regionally significant infrastructure.</b>



Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Bathurst Resources Limited and BT Mining Limited (S491)	S491.011	Historic Heritage	HH - P7	Amend	A suitably qualified professional at considerable cost is not always necessary.	Amend: Demolition and destruction of historic heritage items identified in Schedule One will not be allowed unless it can be demonstrated, through investigation and assessment by a suitably qualified heritage professional that: a. .... been fully considered. <b>A suitably qualified professional may be required to undertake an assessment where it is deemed necessary by the Consent Authority having regard to the nature of the protected heritage item.</b>
Westpower Limited (S547)	S547.175	Historic Heritage	HH - P7	Amend	To consider the reason for potential demolition and destruction in relation to energy activities.	Add <b>d. Any technical, locational, functional or operational constraints or requirements of energy activities.</b>
Northern Buller Communities Society Incorporated (S142)	S142.004	Historic Heritage	HH - P8	Support	In favour of principals	None stated
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.241	Historic Heritage	HH - P8	Support	We support this policy.	Retain policy.
Westpower Limited (S547)	S547.176	Historic Heritage	HH - P8	Amend	To consider use and supply of renewable energy,	Amend a. The alterations are for the primary purpose of ... fire safety, physical access <b>or the supply and use of energy.</b>
Heritage New Zealand Pouhere Taonga (S140)	S140.023	Historic Heritage	HH - P9	Support in part	NZPT supports the principle of this policy, but considers Council should make the commitment to undertake a 10-year work programme to accurately map all NZAA sites, prioritising those of Māori origin.	HNZPT requests the wording of HH-P9 be amended: 'The Councils will work with Heritage New Zealand Pouhere Taonga and Poutini Ngāi Tahu to create a yearly work programme which will enable all NZAA sites of <del>Māori origin</del> on Te Tai o Poutini to be accurately mapped within the next ten years, prioritising sites <b>of Māori origin</b> . These will be included in the Planning Maps as a

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						PlanChange'.
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.242	Historic Heritage	HH - P9	Support	We support this policy.	Retain policy.
Brian Anderson (S576)	S576.002	Historic Heritage	Historic Heritage Rules	Amend	historic heritage needs to be assessed in detail for each piece of land.	Amend rules to assess the historic values as mining proposals arise.
Heritage New Zealand Pouhere Taonga (S140)	S140.024	Historic Heritage	HH - R1	Oppose in part	<p>The ICOMOS NZ Charter advises that where it is necessary to employ new materials, they should be distinguishable from the original. HNZPT is concerned that the wording of this rule does not make this clear and may not always result in distinguishable new work. As this is a permitted activity, we consider this should be made clear within the rule.</p> <p>HNZPT recommends that where such repair or maintenance work is not distinguishable, then the new materials should be date stamped.</p> <p>HNZPT also submits that all of these points should be met for the activity to be permitted, therefore the 'or' should instead be 'and'.</p>	<p>HNZPT requests the wording of HH-R1 be amended:1. Where:a) There are no changes to the extent,floor levels, form, proportion andscale of the item;b) There are no changes to the design,texture, or form of the fabric;c) Use of materials other than those thatare the same as the original, or mostsignificant fabric, or the closestequivalent; <del>or</del><b>and</b>d) There is no damage to the building or structure as a consequence of affixingscaffolding.<b>2. Where repair or maintenance work is notdistinguishable from the original fabric,then the new materials should be date stamped.</b></p>
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.243	Historic Heritage	HH - R1	Support	We support this rule.	Retain rule.
The O'Connor Institute Trust Board (S466)	S466.013	Historic Heritage	HH - R1	Amend		Amend the Rule so that it is clear that internal alterations not effecting the external appearance of the historic heritage building are permitted.

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Frank and Jo Dooley (S478)	S478.056	Historic Heritage	HH - R1	Amend		Amend the Rule so that it is clear that internal alterations not effecting the external appearance of the historic heritage building are permitted.
Buller District Council (S538)	S538.166	Historic Heritage	HH - R1	Support	Rules 1 and 2 are supported.	Retain as notified.
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.244	Historic Heritage	HH - R2	Support	We support this rule.	Retain rule.
The O'Conor Institute Trust Board (S466)	S466.014	Historic Heritage	HH - R2	Support	Given the requirement to comply with HH-R1, it is considered impossible to achieve the intent of providing for the activities in HH - R2 without triggering the need for resource consent approval. Likewise, it is considered that there are many suitably qualified and experience architects that do not necessarily fall within the definition of 'heritage architect'.	Suitably qualified and experienced architects should be provided for in R2 rather than 'heritage architects' specifically.
Frank and Jo Dooley (S478)	S478.057	Historic Heritage	HH - R2	Support	Given the requirement to comply with HH-R1, it is considered impossible to achieve the intent of providing for the activities in HH - R2 without triggering the need for resource consent approval. Likewise, it is considered that there are many suitably qualified and experience architects that do not necessarily fall within the definition of 'heritage architect'.	Suitably qualified and experienced architects should be provided for in R2 rather than 'heritage architects' specifically.
Buller District Council (S538)	S538.167	Historic Heritage	HH - R2	Support	Rules 1 and 2 are supported.	Retain as notified.
Westpower Limited (S547)	S547.177	Historic Heritage	HH - R2	Amend	Suggested amendment above regarding use and supply of energy.	Amend Heading: Earthquake Strengthening, Fire Protection, Accessibility <b>and Supply of Energy</b> Upgrades to ...".
Heritage New Zealand Pouhere Taonga (S140)	S140.025	Historic Heritage	HH - R3	Oppose in part	HNZPT supports the principle of policy HH-R3 which enables earthworks only where either an archaeological authority	HNZPT requests the wording of rule HH-R3be amended:'HH-R3 - Minor Earthworks in a HistoricHeritage Area or <b>Archaeological</b>

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					has been obtained or an Accidental Discovery Protocol commitment has been completed. However the word 'site' in the rule title is linked to the automatic definition box which provides the National Planning Standard definition (i.e., area of land under a single title etc). This is not the correct definition of the word in relation to an archaeological site and is therefore misleading. This could be overcome by not using the term 'site', but rather using the full term 'archaeological site'.	Site identified in Schedule One'
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.245	Historic Heritage	HH - R3	Support	We support this rule.	Retain rule.
Manawa Energy Limited (Manawa Energy) (S438)	S438.066	Historic Heritage	HH - R3	Support in part	Manawa has concerns with the current approach of including district wide earthworks rules under the General District-Wide Matters EW Earthworks chapter (that include rules for overlay areas) and additional rules controlling earthworks within each overlay chapter such as this one. This approach is confusing and leads to duplication of control. Please refer to more expansive feedback on this issue, contained in the EW Earthworks response below. Manawa seeks that this rule be amended to explicitly provide for minor earthworks that are necessary for maintenance and repair of regionally significant infrastructure.	Amend HH - R3 as follows: Where: 1. These are earthworks that will not result in damage, demolition or destruction of heritage items and are associated with: a. An activity permitted under Rule HH - R1 or Rule HH - R2; ... g. Maintaining roads, tracks, carparks, accessways or paved areas within the footprint or modified ground compromised by the existing road, track, carpark, accessway or paved area; and <b>orh. Maintenance and repair of regionally significant infrastructure within the existing footprint of that infrastructure; and</b> 2. An Archaeological Authority ...
Federated Farmers of New Zealand (S524)	S524.045	Historic Heritage	HH - R3	Support in part	Installing fence posts and replacing poles for overhead network utility lines is permitted as is maintenance of roads,	Reword HH-R3 1d and 1e as follows: d. Installing fence posts provided that the area of land disturbed is limited to what is necessary

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					tracks and accessways. Farm fencing should also be considered permitted as the effects of such activities would be similar. Not all heritage items listed in Schedule One are recognised for archaeological value. Archaeological Authorities are required pursuant to the HNZPT Act for activities that seek to modify or destroy an archaeological site. It is not appropriate to require an Archaeological Authority for any and all works affecting an area or site identified in Schedule One. Not only does this add more time and money to the landowner, it will also produce more work for the HNZPT archaeologists processing Authorities. If an Authority is required then it is set out in legislation rather than a provision of this Plan.	to maintain an existing fence or line along its existing alignment; e. the replacement of poles for overhead network utility lines provided that the activity does not involve installation or digging of new holes for overhead network utility lines; or ...  Delete HH-R3(2). of this rule.
Buller District Council (S538)	S538.168	Historic Heritage	HH - R3	Support in part	Clause 2 requires that an Archaeological Authority be issued by Heritage NZ or an Accidental Discovery Protocol (ADP) commitment be completed and submitted to the relevant District Council. Council is uncertain as to what is meant by an 'ADP commitment' and seeks clarification.	Provide guidance on what is meant by an ADP commitment.
Westpower Limited (S547)	S547.178	Historic Heritage	HH - R3	Amend	ensure implementation as intended (item a.).	Amend item 1.a. An activity ... Rule HH-R2; or ...
Westpower Limited (S547)	S547.179	Historic Heritage	HH - R3	Amend		Amend item d. Installing fence posts ... overhead network utility lines ( <b>including energy</b> ) provided ... maintain an existing fence <b>or overhead line</b> and does not involve installation or digging of new <b>fence</b> post holes.
Westpower Limited (S547)	S547.180	Historic Heritage	HH - R3	Support	Item "e." Is supported	Retain item e.

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Department of Conservation (S602)	S602.052	Historic Heritage	HH - R3	Amend	Support minor earthworks Rule HH-R3 and amend it to make the rule explicit that earthworks are only permitted where the earthworks provisions in the EW Section are also met.	Amend: Activity Status Permitted Where:  1. These are earthworks that will not result in damage, demolition or destruction of heritage items and are associated with:  <b>a. An activity permitted under Rule EW-R1 to EW-R6; and...</b>
Chorus NZ Ltd, Spark NZ Trading Ltd, Vodafone NZ Ltd (S663)	S663.036	Historic Heritage	HH - R3	Support	This rule provides for minor earthworks for service connection poles and maintaining existing underground energy assets. To avoid unnecessary consents for minor works, this should be extended to maintaining existing underground telecommunications assets, and provision for new underground customer connections unless the description of the scheduled item in the heritage schedule specifically refers to archaeology. Service connections to heritage buildings support their ongoing use and therefore ongoing upkeep.	Amend the rule as follows: Activity Status Permitted Where: 1. These are earthworks that will not result in damage, demolition or destruction of heritage items and are associated with: ..... d. Installing fence posts and the replacement of poles for overhead network utility lines provided the area of land disturbed is limited to what is necessary to maintain an existing fence along its existing alignment and does not involve installation or digging of new post holes; or e. Maintaining existing underground energy or telecommunications activity assets; <b>e2. Installing new underground customer connections where the building or item has not be scedued in regard to archaeology;</b> f. Maintenance and repair of existing drains within the existing footprint of the drain; or g. Maintaining roads, tracks, carparks, accessways or paved areas within the footprint or modified ground compromised by the existing road, track, carpark, accessway or paved area; and ...
Heritage New Zealand Pouhere Taonga (S140)	S140.026	Historic Heritage	HH - R4	Oppose	The ICOMOS NZ Charter advises that the on-going association of a structure or feature of heritage value with its location, site, curtilage and setting is essential to its authenticity and integrity. HNZPT considers the relocation of a	HNZPT requests that historic heritage items be provided with greater protection from inappropriate repositioning or relocation, through amending the proposed activity status as follows: Repositioning a heritage item within its existing

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					heritage item from its original setting should be avoided. Rare instances may arise where the relocation of a heritage item is a last resort to avoid demolition or loss, such as from sea level rise or other imminent and unavoidable danger. In these instances, repositioning or relocation may be a viable solution, but only when all other means of retaining the structure in its current location have been exhausted. HNZPT considers the proposed status of relocation or repositioning of a Historic Heritage item as a controlled activity does not provide sufficient protection, nor does it send the message that relocation is a last resort	area or site: <b>Discretionary activity</b> Relocating a heritage item to a new area or site: <b>Non-complying activity.</b>
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.246	Historic Heritage	HH - R4	Support	We support this rule.	Retain rule.
Federated Farmers of New Zealand (S524)	S524.046	Historic Heritage	HH - R4	Not Stated	These rules refer to suitably qualified heritage professional. Heritage professional is defined, but as noted earlier, the definition is not appropriate. Suggest deletion of the definition and retain the qualifier in each rule to "suitably qualified"	Delete definition for "heritage professional" and replace in chapter as per wording used in these rules: suitably qualified heritage professional.
Buller District Council (S538)	S538.169	Historic Heritage	HH - R4	Oppose in part	Use of the word 'sustained' in clause 2(ii) suggests the damage has already been caused whereas the intent is to allow relocation or repositioning prior to damage occurring, therefore it is suggested that the rule is amended to reflect this.  Council queries whether a suitably	Amend Clause 2 of Rule 4 as follows:  2. The item is being relocated or repositioned: To its original locations; or Due to an immediate threat from damage <del>sustained</del> in this plan; or By a suitably qualified <del>heritage</del> <b>hazard</b> professional. <del>Notification: Proposals to relocate or</del>

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					<p>qualified 'heritage professional' is the right person to identify the immediate threat and suggests this should be a suitably qualified geotechnical or coastal hazard professional.</p> <p>Rule 4 also states that proposals to relocate or reposition public monuments will always be publicly notified. Council is concerned with this pre-determination on two fronts - if the monument is subject to an immediate threat of damage or loss then there should be the ability to relocate it as quickly as possible. The other point is that Rule 4 is a controlled activity where consent is required to be granted, which is not consistent with the public notification process.</p>	<p><del>reposition monuments will always be publicly notified.</del></p>
Department of Conservation (S602)	S602.053	Historic Heritage	HH - R4	Amend	<p>Support Rule HH-R4 and amend it to require that either an Archaeological Authority is provided or the written approval of Heritage New Zealand - Pouhere Taonga (HNZPT) is provided. This is important to ensure that the applicant consults with HNZPT on the appropriateness of any repositioning or relocation of scheduled heritage items; and HNZPT confirm that the repositioning or relocation is in fact appropriate.</p>	<p>Amend: Activity Status Controlled Where:</p> <ol style="list-style-type: none"> <li>1. All performance standards for Rule HH - R1 are complied with; and</li> <li>2. <b>An Archaeological Authority has been issued by Heritage New Zealand - Pouhere Taonga, or the written approval of Heritage New Zealand - Pouhere Taonga is provided; and...</b></li> </ol>
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.247	Historic Heritage	HH - R5	Support	<p>We support this rule.</p>	<p>Retain rule.</p>
Federated Farmers of New Zealand (S524)	S524.137	Historic Heritage	HH - R5	Support	<p>These rules refer to suitably qualified heritage professional. Heritage professional is defined, but as noted earlier, the definition is not appropriate.</p>	<p>Delete definition for "heritage professional" and replace in chapter as per wording used in these rules: suitably qualified heritage professional.</p>



Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					Suggest deletion of the definition and retain the qualifier in each rule to "suitably qualified"	
Buller District Council (S538)	S538.170	Historic Heritage	HH - R5	Oppose	Rule 5 requires consent for new infrastructure connections to heritage buildings as a controlled activity, with this applying to water and sewage pipelines, telecommunications, electricity etc. Council considers this to be onerous and that new connections should be a permitted activity. It is considered that new connections are unlikely to cause damage to heritage buildings and any concerns around unearthing heritage items during earthworks can be managed through accidental discovery protocols.	Delete Rule 5. Consequential amendment to Rule 3 - add new clause as follows: New infrastructure connections to heritage buildings.
Westpower Limited (S547)	S547.181	Historic Heritage	HH - R5	Amend	Energy should be added to the heading of this rule and item 1.	Amend the heading: New Infrastructure <b>and Energy</b> connections to ...". Amend 1. The new infrastructure <b>and energy</b> connection is to a ...
Department of Conservation (S602)	S602.054	Historic Heritage	HH - R5	Amend	New infrastructure connections to heritage items have the potential to affect the fabric of the building (e.g. overhead lines, water tanks). Support Rule HH-R5 and amend it to require that either an Archaeological Authority is provided or the written approval of Heritage New Zealand - Pouhere Taonga (HNZPT) is provided. This is important to ensure that the applicant consults with HNZPT on the appropriateness of any new infrastructure connections; and HNZPT confirm that these are appropriate.	Amend: Activity Status Controlled Where:  1. The new infrastructure connection is to a historic heritage building listed in Schedule One.; <b>and</b> 2. <b>An Archaeological Authority has been issued by Heritage New Zealand - Pouhere Taonga, or the written approval of Heritage New Zealand - Pouhere Taonga is provided.</b>
Chorus NZ Ltd, Spark NZ Trading Ltd, Vodafone NZ Ltd (S663)	S663.037	Historic Heritage	HH - R5	Support	The rule ensures that certain service connections can be provided to heritage buildings, but with control retained over minimising impacts through design.	Retain provision as notified

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Heritage New Zealand Pouhere Taonga (S140)	S140.027	Historic Heritage	HH - R6	Amend	HNZPT does not support the inclusion of 'Repairs and Maintenance, Earthquake strengthening, fire protection and accessibility upgrades where Permitted Activity standards are not met' and 'Additions and Alterations and associated earthworks' in the same rule. These are very separate activities and grouping them together has the potential to be confusing for Plan users.	HNZPT requests, for ease of use and clarity, that 'Repairs and Maintenance, Earthquake strengthening, fire protection and accessibility upgrades where Permitted Activity standards are not met' and 'Additions and Alterations and associated earthworks' be considered under separate rules.
Heritage New Zealand Pouhere Taonga (S140)	S140.028	Historic Heritage	HH - R6	Amend	1. HNZPT considers the term 'compatibility' could be ambiguous. To avoid uncertainty, we recommend this be reworded. 2. HNZPT considers the inclusion of 'façade' in point c. is too specific and may be seen to attribute more value to the heritage item's façade than other external features.	HNZPT requests the wording of a) and c) be amended: 'Discretion is restricted to: a) <del>Compatibility of the form and materials and setting</del> <b>with inrelation to the Historic Heritage item and its setting;</b> b) Methods to minimise the loss or destruction of the values which contribute to the item's Historic Heritage values as assessed by a suitably qualified heritage professional; c) <del>Compatibility of the treatment of the exterior including the facade</del>
Te Tai o Poutini Plan Committee (S171)	S171.015	Historic Heritage	HH - R6	Amend	HH-R6 is a restricted discretionary activity subject to conditions. There aren't really any conditions to comply with, but non-compliance defaults to discretionary.	Amend rule so that it is restricted discretionary, without conditions. Activity status where compliance is not achieved should be Not Applicable.
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.248	Historic Heritage	HH - R6	Support	We support this rule.	Retain rule.
Manawa Energy Limited (Manawa Energy) (S438)	S438.067	Historic Heritage	HH - R6	Support	Manawa supports restricted discretionary activity status for this rule.	Retain HH-R6 as notified.

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Federated Farmers of New Zealand (S524)	S524.138	Historic Heritage	HH - R6	Support	These rules refer to suitably qualified heritage professional. Heritage professional is defined, but as noted earlier, the definition is not appropriate. Suggest deletion of the definition and retain the qualifier in each rule to "suitably qualified"	Delete definition for "heritage professional" and replace in chapter as per wording used in these rules: suitably qualified heritage professional.
Buller District Council (S538)	S538.171	Historic Heritage	HH - R6	Support	Rule 6 is supported.	Retain as notified.
Westpower Limited (S547)	S547.182	Historic Heritage	HH - R6	Amend	Amend heading to include energy upgrades.	Amend heading: Repairs and ... Protection, Accessibility and <b>Supply of Energy</b> Upgrades ...
Westpower Limited (S547)	S547.183	Historic Heritage	HH - R6	Amend	Add a new matter of discretion the constraints and/or requirements of energy activities.	Add <b>i. Any technical, locational, functional or operational constraints or requirements of energy activities.</b>
Heritage New Zealand Pouhere Taonga (S140)	S140.029	Historic Heritage	HH - R7	Oppose	HNZPT considers the proposed status of relocation or repositioning of Historic Heritage item does not provide sufficient protection, nor does it send the message that these activities are a last resort. Refer to comments in point 025 of this submission.	HNZPT requests that relocation be a noncomplying activity and repositioning be a discretionary activity.
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.249	Historic Heritage	HH - R7	Support	We support this rule.	Retain rule.
Buller District Council (S538)	S538.172	Historic Heritage	HH - R7	Oppose in part	Rule 7 states that proposals to relocate or reposition public monuments will always be publicly notified. As discussed above, Council is concerned with this predetermination in that if the monument is subject to an immediate threat of damage or loss then there should be the ability to relocate it as quickly as possible and not be delayed by the public notification process.	Amend Rule 7 as follows: <del>Notification: Proposals to relocate or reposition monuments will always be publicly notified.</del>

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Westpower Limited (S547)	S547.184	Historic Heritage	HH - R7	Amend	Add a new matter of discretion the constraints and/or requirements of energy activities.	Add <b>g. Any technical, locational, functional or operational constraints or requirements of energy activities.</b>
Department of Conservation (S602)	S602.055	Historic Heritage	HH - R7	Amend	The activities in Rules HH-R7 and HH-R8 have the potential to adversely affect heritage items. Support Rules HH-R7 and HH-R8 and amend them to include the consideration of any approved Archaeological Authority, and any consultation feedback provided by HNZPT. This is important to ensure that any feedback from HNZPT on the appropriateness of the activity is considered by council in the assessment of the application.	Amend: Activity Status Restricted Discretionary Discretion is restricted to: <b>1. Whether an Archaeological Authority has been issued by Heritage New Zealand - Pouhere Taonga, and whether any consultation feedback has been provided to the applicant by Heritage New Zealand - Pouhere Taonga; and...</b>
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.108	Historic Heritage	HH - R7	Amend	Relocating or repositioning of a historic heritage item and associated earthworks could also impact on Poutini Ngāi Tahu values	Amend to include the following discretions to listed in HH-R7: <b>f. Impacts of the activity on the cultural values on any site or area of significance to Māori; and Implementation of any advice received from the relevant Poutini Ngāi Tahu rūnanga on ways to manage the effects on cultural values of the proposed maintenance works.</b>
Heritage New Zealand Pouhere Taonga (S140)	S140.030	Historic Heritage	HH - R8	Support	HNZPT supports the matters of discretion associated with rule HH-R8, which seek to minimise the effects of new structures in Historic Areas and to ensure they are compatible with existing structures and features.	Retain as proposed
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.250	Historic Heritage	HH - R8	Support	We support this rule.	Retain rule.
Manawa Energy Limited (Manawa Energy) (S438)	S438.068	Historic Heritage	HH - R8	Support	Manawa supports restricted discretionary activity status for this rule.	Retain HH-R8 as notified.

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Heritage New Zealand Pouhere Taonga (S140)	S140.031	Historic Heritage	HH - R9	Oppose	Under section (6)(f), the RMA identifies the protection of historic heritage as a matter of national importance. The impact of demolition of a heritage item is irreversible and as more heritage buildings are lost, we increasingly lose touch with the history and origins of our surroundings. Today's heritage items are tangible remains of the West Coast's rich and unique history. HNZPT therefore strongly advocates for demolition and destruction of heritage items to be a non-complying activity.	HNZPT requests Demolition and Destruction of a Historic Heritage item or Historic Area be identified as a non-complying activity.
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.251	Historic Heritage	HH - R9	Support	We support this rule.	Retain rule.
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.252	Historic Heritage	HH - R10	Support	We support this rule.	Retain rule.
Manawa Energy Limited (Manawa Energy) (S438)	S438.069	Historic Heritage	HH - R10	Oppose	Manawa considers that this rule is unreasonably restrictive of nationally significant activities and that there is no good reason for such activities to be treated more restrictively than any other buildings or structures. Placing energy and infrastructure activities at discretionary activity status is the same activity status as demolition of the heritage item but does not have the same impact. The only issues of relevance for consideration are the impact on the heritage item and thus should be no more than restricted discretionary and	Delete HH-R10.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					addressed in the same way as any other buildings or structures.	
Buller District Council (S538)	S538.173	Historic Heritage	HH - R10	Oppose	As discussed for Rule 5, Council considers Rule 10 to be overly onerous and that new infrastructure connections should be a permitted activity subject to accidental discovery protocols, therefore Council seeks the removal of Rule 10.	Delete Rule 10.
Westpower Limited (S547)	S547.185	Historic Heritage	HH - R10	Amend	New energy activities should also be considered under this category of activity.	Add a new rule to provide for new energy activities as "restricted discretionary activities.
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.253	Historic Heritage	HH - R11	Support	We support this rule.	Retain rule.
Buller District Council (S538)	S538.174	Historic Heritage	HH - R11	Support	Rule 11 is supported.	Retain as notified.
Greymouth Heritage Trust (S104)	S104.008	Historic Heritage	Other Methods	Amend	Its not viable for our community to put sufficient resources in place right now to protect all assets immediately but if we start with a little now this will build to create a resource that is cost effective and have significant community benefits. This fund recognises that there is a cost to Heritage Building and site owners to maintain them in a way that protects the Heritage values, This cost often provides a benefit to the community but not to the owner.	That the Plan requires councils to provide for a Heritage Protection Fund and a Long Term Heritage Assets Maintenance Plan so that identified Heritage assets are not left to Demolition by neglect.
Lucina Brady (S322)	S322.002	Historic Heritage	Other Methods	Amend	1- to retain a Heritage Building, which many of them are in disrepair, so goes to show Council not interested in retaining Heritage Buildings. The 3-waters 'Better Off Funding' could have been used to purchase this building. 2 - it would compliment the new Maori Pathway building that is going to be built on old Revingtons site.	However, one thing I would like to identify and that is for the Old Courthouse in Greymouth to be purchased and retained so that 'History House can be housed in there

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Heritage New Zealand Pouhere Taonga (S140)	S140.032	Historic Heritage	HH - M1	Support	HNZPT strongly supports the Council's commitment to support owners of historic heritage items to maintain their assets through Council appropriate resources, as detailed in Other Methods.	Retain as proposed
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.254	Historic Heritage	HH - M1	Support	We support this rule.	Retain rule.
G.E. and C.J. Coates on behalf of Nikau Deer Farm Limited (S415)	S415.002	Notable Trees	TREE	Oppose	Erosion of private property rights. Section 32 analysis has not been adequately done. Research into what "Notable" means in relation to Notable Trees has not been done.	Remove Notable Trees Section until adequate analysis has been done as laid out in Section 32. The private information gathered from the Section 32 analysis is to be kept private (Central Government required to find a solution to this).
Te Tumu Paeroa - The office of the Māori Trustee (S440)	S440.052	Notable Trees	TREE	Support in part	The Māori Trustee supports the listing of TREE 58 and 59 in Schedule two of the Proposed Plan that are located on lands administered by the Māori Trustee.  However, the Māori Trustee reiterates her point made under the 'Notable Trees' chapter that this schedule should clearly identify which trees are considered of value to Poutini Ngāi Tahu.	The Māori Trustee considers that notable trees of value to Poutini Ngāi Tahu need to clearly be identified in Schedule Two of the Proposed Plan.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.187	Notable Trees	TREE	Support	Support whole chapter except as set out below.	Retain.
Westpower Limited (S547)	S547.186	Notable Trees	Notable Tree Objectives	Amend	Activities involving notable trees are required in relation to energy activities,	Add New objective <b>TREE-04: When managing potential effects of Energy Activities, including Critical Infrastructure, on notable trees recognise and provide for instances where trimming and/or pruning is required, or circumstances where removal of the tree</b>

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						is unavoidable.
Chris & Jan Coll (S558)	S558.066	Notable Trees	Notable Tree Objectives	Support		Retain
Chris J Coll Surveying Limited (S566)	S566.066	Notable Trees	Notable Tree Objectives	Support		Retain
William McLaughlin (S567)	S567.150	Notable Trees	Notable Tree Objectives	Support		Retain
Laura Coll McLaughlin (S574)	S574.066	Notable Trees	Notable Tree Objectives	Support		Retain
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.256	Notable Trees	TREE - O1	Support	We support this objective.	Retain objective.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.188	Notable Trees	TREE - O1	Support in part	Habitat needs to be included. Notable trees are sometimes those that provide habitat to birds or bats.	Add <b>habitat</b>
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.257	Notable Trees	TREE - O2	Support	We support this objective.	Retain objective.
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.109	Notable Trees	TREE - O2	Support	It is important that tino rangatiratanga of Poutini Ngai Tahu is provided for	Retain as notified
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.258	Notable Trees	TREE - O3	Support	We support this objective.	Retain objective.



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Waka Kotahi NZ Transport Agency (S450)	S450.071	Notable Trees	TREE - O3	Support in part	The objective is generally supported by Waka Kotahi as it recognises that the removal of the tree is unavoidable due to safety. However, the objective currently only allows for the removal of notable trees for safety where it may be more appropriate at times to only trim or prune. It is recommended that trimming or pruning of notable trees be appropriate to provide for safety benefits.	Amend the objective to provide for trimming and/or pruning of notable trees for safety.
Grey District Council (S608)	S608.597	Notable Trees	TREE - O3	Support in part	It is recommended that trimming or pruning of notable trees be appropriate to provide for safety benefits.	Amend the objective to provide for trimming and/or pruning of notable trees for safety benefits.
Westpower Limited (S547)	S547.187	Notable Trees	Notable Tree Policies	Amend	To provide for instances to allow removal to provide for energy activities.	Add new Policy: <b>Recognise and provide for circumstances where it is appropriate to remove a notable tree due to the technical, locational, functional or operational constraints or requirements of energy activities, including critical infrastructure.</b>
Frida Inta (S553)	S553.055	Notable Trees	Notable Tree Policies	Amend	Tree P5(e) BCG is concerned that this policy clause could provide a loophole.	Amend Policy P5(e) Add <b>P7 Allow for the inclusion and protection of further notable trees within the district without requiring any plan change</b>
Chris & Jan Coll (S558)	S558.067	Notable Trees	Notable Tree Policies	Support		Retain
Chris J Coll Surveying Limited (S566)	S566.067	Notable Trees	Notable Tree Policies	Support		Retain
William McLaughlin (S567)	S567.151	Notable Trees	Notable Tree Policies	Support		Retain
Laura Coll McLaughlin (S574)	S574.067	Notable Trees	Notable Tree Policies	Support		Retain
Te Mana Ora (Community and	S190.259	Notable Trees	TREE - P1	Support	We support this policy.	Retain policy.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Public Health) of the NPHS/ Te Whatu Ora (S190)						
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.260	Notable Trees	TREE - P2	Support	We support this policy.	Retain policy.
Westpower Limited (S547)	S547.188	Notable Trees	TREE - P2	Amend	There will not be total protection in all circumstances.	Amend TREE-P2: Trees identified ... are <b>generally</b> protected except <b>in circumstances where tree trimming and/or pruning or removal are appropriate.</b>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.470	Notable Trees	TREE - P2	Amend	Habitat needs to be included. Notable trees are sometimes those that provide habitat to birds or bats.	Add habitat
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.261	Notable Trees	TREE - P3	Support	We support this policy.	Retain policy.
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.110	Notable Trees	TREE - P3	Support	It is important that tino rangatiratanga of Poutini Ngāi Tahu is provided for in the management of trees of value to Poutini Ngāi Tahu	Retain as notified
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.262	Notable Trees	TREE - P4	Support	We support this policy.	Retain policy.
Waka Kotahi NZ Transport Agency (S450)	S450.072	Notable Trees	TREE - P4	Support	Waka Kotahi supports that trimming and pruning of notable trees are necessary to prevent serious threat to property and people and necessary for the ongoing provision of existing infrastructure.	Retain as proposed.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Westpower Limited (S547)	S547.189	Notable Trees	TREE - P4	Amend	To ensure it achieves the stated intent of allowing activity under certain circumstances.	Amend item b. b. Are necessary for ... and people; <b>or</b>
Westpower Limited (S547)	S547.190	Notable Trees	TREE - P4	Amend	The plan contains many potential definitions for energy activities should reflect that.	Amend c. Are necessary for the ongoing <b>provision and operation of energy activities and infrastructure, including critical infrastructure</b> ; or d. Are for the maintenance of <b>energy activities and infrastructure, including critical infrastructure</b> , to enable ... .
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.471	Notable Trees	TREE - P4	Amend		Add e. outside of bird breeding and nesting periods
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.472	Notable Trees	TREE - P4	Amend	Consequential change adding this to requirement into TREE - R2 and R3	Make consequential change adding this to requirement into TREE - R2 and R3
Grey District Council (S608)	S608.598	Notable Trees	TREE - P4	Support	Council supports that trimming and pruning of notable trees are necessary to prevent serious threat to property and people and necessary for the ongoing provision of existing infrastructure. c.it is considered that this sentence requires the word 'provision' to be added after ongoing ...	Retain as proposed. c. Amend wording to read "Are necessary for the ongoing provision of infrastructure ..."
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.263	Notable Trees	TREE - P5	Support	We support this policy.	Retain policy.
Westpower Limited (S547)	S547.191	Notable Trees	TREE - P5	Amend	The constraints and requirements of energy activities and critical infrastructure.	Add <b>f. Any technical, locational, functional or operational constraints or requirements of energy activities, including critical infrastructure.</b>

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Buller Conservation Group (S552)	S552.055	Notable Trees	TREE - P5	Amend	Tree P5(e) this policy clause could allow for any development to remove a notable tree	Amend Policy P5(e) Add <b>P7 Allow for the inclusion and protection of further notable trees within the district without requiring any plan change</b>
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.111	Notable Trees	TREE - P5	Support	Clause (b) links to TREE-O2 enabling Poutini Ngāi Tahu to be involved in any outcomes	Retain as notified
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.264	Notable Trees	TREE - P6	Support	We support this policy.	Retain policy.
Waka Kotahi NZ Transport Agency (S450)	S450.073	Notable Trees	TREE - P6	Support	Waka Kotahi supports the policy as it allows for the removal, partial removal, or destruction of an unsafe or unsound notable when certified by a Council approved arborist.	Retain as proposed.
Grey District Council (S608)	S608.599	Notable Trees	TREE - P6	Support	This policy is supported as it allows for the removal, partial removal, or destruction of an unsafe or unsound notable when certified by a Council approved arborist.	Retain as proposed.
Chris & Jan Coll (S558)	S558.068	Notable Trees	Notable Tree Rules	Support		Retain
Chris J Coll Surveying Limited (S566)	S566.068	Notable Trees	Notable Tree Rules	Support		Retain
William McLaughlin (S567)	S567.152	Notable Trees	Notable Tree Rules	Support		Retain
Laura Coll McLaughlin (S574)	S574.068	Notable Trees	Notable Tree Rules	Support		Retain
Te Mana Ora (Community and Public Health) of the	S190.265	Notable Trees	TREE - R1	Support	We support this rule.	Retain rule.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
NPBS/ Te Whatu Ora (S190)						
Te Mana Ora (Community and Public Health) of the NPBS/ Te Whatu Ora (S190)	S190.266	Notable Trees	TREE - R2	Support	We support this rule.	Retain rule.
Waka Kotahi NZ Transport Agency (S450)	S450.074	Notable Trees	TREE - R2	Support	The provision of the rule is supported by Waka Kotahi as it enables the safe operation of the state highway infrastructure.	Retain as proposed.
Westpower Limited (S547)	S547.192	Notable Trees	TREE - R2	Amend	To be consistent Objectives and policies and with the terminology of the plan.	Amend b. To enable the ongoing provision <b>and operation</b> of existing <b>energy activities and infrastructure, including critical infrastructure;</b> or
Grey District Council (S608)	S608.600	Notable Trees	TREE - R2	Support	Support the rule as it enables the safe operation of the existing infrastructure.	Retain as proposed.
Te Mana Ora (Community and Public Health) of the NPBS/ Te Whatu Ora (S190)	S190.267	Notable Trees	TREE - R3	Support	We support this rule.	Retain rule.
Waka Kotahi NZ Transport Agency (S450)	S450.075	Notable Trees	TREE - R3	Support	The rule is supported as it provides for pruning of roots within the root protection area to enable the ongoing provision of infrastructure where the integrity, ongoing viability and value of the tree is not compromised.	Retain as proposed.
Westpower Limited (S547)	S547.193	Notable Trees	TREE - R3	Amend	To be consistent objectives and policies and with the terminology of the plan.	Amend 3.b. To enable the ongoing provision <b>and operation</b> of existing <b>energy activities and infrastructure, including critical infrastructure;</b> or
Grey District Council (S608)	S608.601	Notable Trees	TREE - R3	Support	Support the rule as it enables the safe operation of the existing infrastructure.	Retain as proposed
Te Mana Ora (Community and	S190.268	Notable Trees	TREE - R4	Support	We support this rule.	Retain rule.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Public Health) of the NPHS/ Te Whatu Ora (S190)						
Waka Kotahi NZ Transport Agency (S450)	S450.076	Notable Trees	TREE - R4	Support	The intent of the rule is supported as it allows for buildings activities as a restricted discretionary activity. The matters of discretion include whether there is an operational or functional need for the activity, which in some instances could allow for state highway infrastructure to be built within the Root Protection Area.	Retain as proposed.
Westpower Limited (S547)	S547.194	Notable Trees	TREE - R4	Amend	Minor amendments are required to the matters over which discretion are restricted to ensure that energy activities are appropriately provided for, and ensure consistency of wording throughout the plan. It is also important to consider the benefits arising from the propose activity in determining the matter	<ol style="list-style-type: none"> <li>1. Amend d. Whether there is <b>any technical, locational</b>, operational or functional need for ...</li> <li>2. Amend item e. Whether any <b>practicable</b> alternatives ...</li> <li>3. Add a new matter <b>f., The benefits to the community of the activity occurring</b></li> </ol>
Westpower Limited (S547)	S547.195	Notable Trees	TREE - R4	Amend	To consider the benefits arising from the proposed activity in determining the matter.	Add f. The benefits to the community of the activity occurring.
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.269	Notable Trees	TREE - R5	Support	We support this rule.	Retain rule.
Waka Kotahi NZ Transport Agency (S450)	S450.077	Notable Trees	TREE - R5	Support in part	The rule is generally supported as it provides for new infrastructure within the Root Protection Area of a Notable Tree if there is an operational or functional need. However, R5.d. also states that this should be avoided if there are alternatives. The rule both provides for and requires an assessment for	Amend R5.1(d) to "Whether there is an operational or functional need for the activity to be located within the root protection area and/or whether any alternatives are available for the activity to locate elsewhere. <del>to avoid the activity occurring in the root protection area.</del> "

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					avoidance, which is confusing. It is recommended that clarity is given to this rule.	
Westpower Limited (S547)	S547.196	Notable Trees	TREE - R5	Amend	To ensure that energy activities are appropriately provided for.	Item c. appears to be a duplication of item a. and should be deleted.
Westpower Limited (S547)	S547.197	Notable Trees	TREE - R5	Amend	To ensure that energy activities are appropriately provided for.	Split and amend item d. to read: d. Whether there is any <b>technical, locational</b> , operational or functional need for the activity to be located within the root protection area, and/ <b>ore</b> . Whether any practicable alternatives are available to avoid the activity occurring in the root protection area
Westpower Limited (S547)	S547.198	Notable Trees	TREE - R5	Amend	To consider the benefits arising from the proposed activity in determining the matter.	f. The benefits to the community of the activity occurring.
Chorus NZ Ltd, Spark NZ Trading Ltd, Vodafone NZ Ltd (S663)	S663.038	Notable Trees	TREE - R5	Amend	The intent of the rule in regard to permitted trimming and pruning of notable trees is supported. However, there is a missing work in clause (c). The word "provision" is missing	Amend clause (c) of the rule as follows: ... c. Are necessary for the ongoing <b>provision</b> of infrastructure; or ...
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.270	Notable Trees	TREE - R6	Support	We support this rule.	Retain rule.
Westpower Limited (S547)	S547.199	Notable Trees	TREE - R6	Amend	To ensure that energy activities are provided for, and for consistency with other rules.	Item c. appears to be a duplication of item a. and should be deleted.
Westpower Limited (S547)	S547.200	Notable Trees	TREE - R6	Amend	To ensure that energy activities are provided for, and for consistency with other rules.	Split and amend <b>d. Whether there is any technical, locational, operational or functional need for the activity to be located within the root protection area, and/ore. Whether any practicable alternatives are available to avoid the activity occurring in</b>

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<b>the root protection area.</b>
Westpower Limited (S547)	S547.201	Notable Trees	TREE - R6	Amend	To consider the benefits arising from the propose activity in determining the matter.	Add <b>f. The benefits to the community of the activity occurring.</b>
Westpower Limited (S547)	S547.202	Notable Trees	Discretionary Activities	Support	Proposed discretionary rules are generally supported.	Retain
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.271	Notable Trees	TREE - R7	Support	We support this rule.	Retain rule.
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.272	Notable Trees	TREE - R8	Support	We support this rule.	Retain rule.
G.E. and C.J. Coates on behalf of Nikau Deer Farm Limited (S415)	S415.003	Sites and Areas of Significance to Māori	SASM	Oppose	Erosion of private property rights. Section 32 analysis has not been adequately done. Research into what "Significance" means in relation to "Sites and Areas of Significance to Maori" has not be done. For example Mawhera Incorporated sold sections in Greymouth weeks prior to the TTPP announcement to private owners. They had sought permission from the Maori Land Court to do so and it was deemed that the sections were not significant therefore could be sold. Now the private owners of the sections have a SASM on these sections. This brings to attention that the decision making process with regard to SASM's was not adequate. Other areas have SASM's that are in the ocean and could not have been occupied by Maori and therefore cannot have Urupa on that site. Therefore the process undertaken to identify these sites and areas was not robust. It brings to	Remove SASM Section until adequate analysis has been done as layed out in Section 32. These areas have not been correctly identified as illustrated in our example in the reasons section. They need to be redone correctly. The private information gathered from the Section 32 analysis is to be kept private (Central Government required to find a solution to this).



Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					question all of the SASM areas indicated in the plan.	
Te Tumu Paeroa - The office of the Māori Trustee (S440)	S440.053	Sites and Areas of Significance to Māori	SASM	Support in part	<p>The Māori Trustee partially supports the 12 listed SASM in Schedule three of the Proposed Plan that are located on lands administered by the Māori Trustee.</p> <p>However, as previously stated in the SASM O2 section of this submission, the proposed E-Plan indicates that sites of significance to Māori cover the extent of entire property records of title. Therefore, the Māori Trustee considers that the extent of these sites of significance need to be clearly identified in Schedule Three.</p>	<p>The Māori Trustee considers that the Te Tai o Poutini E-Plan needs to clearly identify the extent of sites of significance to Māori as they currently appear to be across entire property records of titles. This applies to the following sites:</p> <p>SASM 18 SASM 133 SASM 149 SASM 151 SASM 153 SASM 157 SASM 158 SASM 178 SASM 179 SASM 180 SASM 181 SASM 183</p>
Department of Conservation (S602)	S602.060	Sites and Areas of Significance to Māori	SASM	Neutral	DOC is neutral as these do not affect priority conservation values, biodiversity values, or DOC's interests.	NA
Donna Mitchell (S107)	S107.001	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori	Oppose	So much of the plan concerning cultural significance is not based on fact. I do not consider that there is any cultural significance on my property.	The TTPP should be completely dropped in its current form
Paul Heal (S133)	S133.001	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori	Oppose	No evidence of SASM. The section was purchased from Mawhera (137 Peel Street, Westport).	Removal of any SASM rules and appellations to all land/sections that have been legally purchased from the local Iwi located in a town within the past 50 years.
Garry Livingstone (S201)	S201.001	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori	Oppose	<p>The SASMs on freehold land are ignoring the rights of the ratepayers. Most of Maori have no interest in these properties.</p> <p>The owner of freehold land should enjoy free ownership for perpetuity and can use the land for any purpose.</p> <p>Drones have been used over properties to identify areas that are insignificant.</p> <p>This redefining of the rules must be tested in court.</p>	Repeal SASMs.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Andrew Beaumont (S225)	S225.003	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori	Support		Support protection of historic Maori significant areas
George Brownlee (S247)	S247.002	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori	Support	Happy to protect the sites.	Retain provisions in the Plan protecting Sites and Areas of Significance to Māori.
Skyline Enterprises Limited (S250)	S250.003	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori	Oppose	In the Sites and Areas of Significance to Māori - Ngā Wāhi Tāpua ki te Māori chapter it appears that development of an Aerial Cableway would by virtue of its necessary earthworks being more than 'minor earthworks', necessitate a Discretionary Activity Consent and that automatic limited notification would be required to the relevant Poutini Ngai Tahu. The Objectives and Policies in this chapter specify that sites and areas of significance to Māori be protected from inappropriate use and development and the Policies for inappropriate activities specifically requires restriction of buildings, structures, and earthworks on the upper slopes of ancestral maunga in Schedule Three.	The proposed Amenities Area and development of an aerial cableway to Franz Josef should be provided for in the provisions in the Sites and Areas of Significance to Māori - Ngā Wāhi Tāpua ki te Māori chapter enable consideration of such a development
Stephen Page (S270)	S270.001	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori	Oppose	Use the existing judicial system to identify sites and areas of significance to Māori.	I wish the Council and Poutini Ngai Tahu to utilise the Maori Land Courts and the principles of the Treaty of Waitangi in order to obtain authority over the Sites and Areas of Significance to Maori that have been identified in the proposed TTPP.
Kawhaka Creek Catchment Residence (S297)	S297.004	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori	Oppose	What compensation is going to be out in place, should it impact the value of our properties and the ability to sell our properties?	Provide compensation for loss of property values for having SASM 104 on the property.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Kawhaka Creek Catchment Residence (S297)	S297.018	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori	Oppose	<p>We are concerned that the process has not transparent that there is an agenda that is not disclosed. We understand that there has been considerable research done over the past 3 years. There is no way we as individuals the we have the resources or the time to research our position with such short notice.</p> <p>Our land is our land, we have worked on it for a significant period of time. it is not just the value of the land, it is the work and labour that has gone into it, the memories it has to us, and the significance it holds for our families and whanau.</p> <p>Its is leaving us with a feeling of being disenfranchised, disempowered, with no participation or voice.</p>	Provide for process that engages with affected property owners.
Neil Bradley (S298)	S298.003	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori	Oppose	<p>I purchased my property free hold, with no covenants. If that will change, please specify how compensation will be calculated and debited due to potential loss of value by having new conditions potentially added. Please confirm compensation will be paid and explain the method used for this process</p>	Provide compensation for the identification of SASM 104 on my property.
Transpower New Zealand Limited (S299)	S299.023	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori	Support	<p>It appears that the SASM chapter applies to National Grid activities. Transpower is not opposed to this approach, although it would prefer that all provisions relating to the National Grid are located in the Energy Chapter. It is important that the objectives and policies already in the ENG chapter are applied to any National Grid activity. The overall approach in the SASM chapter, as it relates to the National Grid, is generally consistent with the NPSET.</p>	No specific relief sought

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Gerrit and Suzie Wolters (S308)	S308.003	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori	Oppose	I note that this is going to be put on our LIM report this would significantly decrease the value of our land. Should we in the future want to sell our property we would be negatively impacted. Why does it need to be on our LIM ?	Do not include information on Sites of Significance to Māori on LIM reports.
Gerrit and Suzie Wolters (S308)	S308.004	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori	Oppose	What compensation is going to be put in place, if it is going to be placed on our LIM report?	Provide compensation to landowners if SASM are shown on LIM reports.
Gerrit and Suzie Wolters (S308)	S308.016	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori	Oppose	How was the area specifically marked on the map established as an area of significance to Māori, what formula or methodology was used to establish the highlighted area.	Provide information on the methodology and basis of identifying SASM.
Michael Robson (S327)	S327.002	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori	Amend	My property is affected by both the Maori SASM206 and SASM208. In relation to developing property within SASM'S there should be some sort of guidelines from the iwi in relation to what they will be considering when consent is requested for development within an area of significance. Whether that is a report from a suitably qualified person in relation to the particular property or other considerations a property owner will need to consider and respond to when requesting consent.	Provide guidelines on what matters need to be considered in relation the SASM when their consent is needed to do work.
David Marshall (S347)	S347.003	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori	Support	One positive in the TTPP plan is the designation of Sites and Areas of Significance to Māori - Ngā Wāhi Tāpua ki te Māori (SASM). This takes a step toward fulfilling the obligation to honour Te Tiriti / The Treaty of Waitangi.	Implementation of what has been drafted in the TTPP plan. Public communication on this legislation needs to be clear. There should be no room left for misinformation.
Bernard Hands (S350)	S350.001	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori	Oppose	There does not appear to be any information available about how my land has come to be identified nor why my land is significant. The rules are hard to navigate and it is difficult to determine what exactly the consequences of having	I seek that the SASM provisions be removed.

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					<p>my land identified as SASM are. I have not been involved in the process of determining whether my land was a SASM. I am concerned about the decrease in land value that will result. The TTPP purports to impose restrictions on what I can do with my land without a resource consent. This is against my right to indefeasibility of title which is a core component of our land transfer system and protects me against competing interests and claims not appearing on the land register.</p> <p>There is nothing stopping the next district plan or further amendments imposing further restrictions on my land and continuously encroaching more of my rights as the landowner.</p>	
Charlotte Bradley-Peni (S370)	S370.001	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori	Amend	<p>No evidence have been shared with private landowners to clarify the SASM identification.</p> <p>Object to the use of the RMA by local authorities as this seems to be a matter best handled by the Waitangi Tribunal and the Crown.</p>	Provide details to landowners regarding the SASM points of interest. Provide details and evidence on how the Treaty Settlement Act supports SASM within the TTPP.
Ann Bradley (S371)	S371.002	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori	Oppose		Object to the use of the RMA by local authorities when it should be a treaty settlement between the TOW tribunal and the Crown.
Garry Gaasbeek (S398)	S398.003	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori	Oppose		No historical evidence of any Maori village in the Okuru area.
Anne Chapman (S425)	S425.002	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori	Oppose	<p>We need to know more about the the "Land of significant to Maori" sometimes 5 generation farmers have lived on their land and have no idea this has been noted within this document and nowhere else. these same farmers will find when they want to upgrade sheds or build a</p>	Review/remove sites of significance to Māori at Punakaiki,

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					new house, they will have to jump through hoops not just with the RMA but ask the local tribe for permission. I believe this is the thin end of the wedge.	
Waka Kotahi NZ Transport Agency (S450)	S450.078	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori	Support	Waka Kotahi generally supports the Sites and Areas of Significance to Māori chapter. The Overlay provides a visual queue that clearly identifies where these significant sites and areas are located, which can inform when consultation can occur. There are many instances where the SASM overlay overlaps with the state highway network where some of these rules would apply. However, the state highway designation would allow for general works or maintenance necessary to ensure the continued operation of the state highway. If any significant works were to occur, then Waka Kotahi would ensure that the rules are taken complied with and appropriate consultation was undertaken with the Rūnanga.	Retain as proposed.
Greenstone Retreat (S459)	S459.014	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori	Amend	The private property owners whose land falls within one, have been given no opportunity to 'Participate' in their formulation, nor been offered any 'Protection' of their ownership rights	Amend to clarify issues
Rocky Mining Limited (S474)	S474.007	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori	Amend		Seek a restricted discretionary rule in the overlay chapters for mineral extraction, or at minimum activities with a functional and operational need - discretion should be restricted to the values of the particular overlay.
Rocky Mining Limited (S474)	S474.034	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori	Amend		seek recognition within all overlay chapters that mineral extraction has a functional and operational need to locate where the resource is, and that this functional and operational need be given due consideration in resource consent

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						applications within the specific overlay;
Rocky Mining Limited (S474)	S474.037	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori	Amend		seek that directive overlay provisions seeking to "avoid, protect, prevent" or "minimise, restrict and preserve" should be limited to situations where they are warranted (i.e. for significant adverse effects, or in environments meeting significance criteria (such as SASM or Significant Natural Areas)) because they can be problematic for passing the gateway test;
Rocky Mining Limited (S474)	S474.041	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori	Amend		overlay chapters, including the SASM and Management Area overlays, contain a restricted discretionary rule for mining, with discretion restricted to effects on the specific overlay or overlay values;
Scenic Hotel Group (S483)	S483.008	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori	Oppose	Cannot allow sites and areas of significance to Māori to restrict or delay future developments or enhancements of private businesses as this could render private land to be a liability and essentially worthless. The process establishing the management of SASM is unclear.	Withdraw SASM where they restrict businesses and private developments.
Papahaua Resources Limited (S500)	S500.023	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori	Amend		seek recognition within all overlay chapters that mineral extraction has a functional and operational need to locate where the resource is, and that this functional and operational need be given due consideration in resource consent applications within the specific overlay;
Papahaua Resources Limited (S500)	S500.026	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori	Amend		seek that directive overlay provisions seeking to "avoid, protect, prevent" or "minimise, restrict and preserve" should be limited to situations where they are warranted (i.e. for significant adverse effects, or in environments meeting significance criteria (such as SASM or Significant Natural Areas)) because they can be problematic for passing the gateway test;

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Papahaua Resources Limited (S500)	S500.028	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori	Amend		overlay chapters contain a restricted discretionary rule for mining, with discretion restricted to effects on the specific overlay or overlay values;
Taipo Dairies Limited (S520)	S520.001	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori	Oppose	there has not been enough time for landowners to understand the implications for their property and why it has been identified as having significance. We oppose rules on private farming land that we have looked after and grazed for many years.	Remove Sites and Areas of Significance to Māori from the plan.
Buller District Council (S538)	S538.195	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori	Support in part	Council supports the identification of SASMs and the need to protect the cultural values associated with these sites. However, the mapped extent of SASMs cover large areas encompassing a range of existing land uses and there is potential for unexpected restrictions where this may not be warranted. Council requests that consideration is given to categorising the SASMs to reflect their varying importance and that the rule framework is reviewed accordingly.	Council seeks that consideration is given to categorising the SASMs to reflect their varying importance and that the rule framework is reviewed accordingly.
Department of Conservation (S602)	S602.011	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori	Oppose	Significant areas and values are referenced in different ways throughout the Plan, including 'overlay chapter', 'overlay area', 'overlay chapter area', 'schedule area', 'schedule' or by listing out the schedule name (or an alteration to the schedule name), or the key values (where it is implicit that the whole 'overlay' is being referred to - this is common throughout the Plan for SNAs). This can be confusing and could be simplified by amending the provisions throughout the Plan to be more consistent.	Amend references to significant values and areas where there is inconsistency throughout the Plan, and particularly where these relate to Schedules, Overlays, and SNAs.



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Grey District Council (S608)	S608.011	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori	Oppose	The extent of the sites are excessive	Remove the sites so that they can be further reviewed and reassessed.
Grey District Council (S608)	S608.012	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori	Oppose	The source of information is singular	Insert a statutory process for identification, agreement with landowner, management incentives, and insertion of new mapped areas into plan by way of Schedule 1 process. No SASM can be formalised except by way of plan change.
Grey District Council (S608)	S608.485	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori	Support	Council opposes the cultural landscape approach taken in this plan.	A framework is sought that will not impinge on the use of private property
Grey District Council (S608)	S608.486	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori	Support	The source of information is singular with little ability to be subjectively peer reviewed.	Insert a statutory process for identification, agreement with landowner, management incentives, and insertion of new mapped areas into plan by way of Schedule 1 process. No SASM can be formalised except by way of plan change.
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.023	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori	Support	We support the inclusions of this overlay, subject to the more specific comments below.	Retain
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.112	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori	Support	It is important to Poutini Ngāi Tahu that our sites of significance are protected	Retain the objectives, policies and rules within this chapter as notified, except where changes have been requested to an objective, policy or rule below.
The Proprietors of Mawhera Tiamana Mawhera Incorporation (S621)	S621.007	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori	Amend	All the ancestral land within the boundaries of the 1860 Arahura Deed of Purchase known by the Kai Tahu Tipuna and their present day descendants as Te Tai o Poutini is a present day interpretation as a Site of Significant to them.	Amend the plan to include all the ancestral land within the boundaries of the 1860 Arahura Deed of Purchase, known by the Kai Tahu Tipuna and their present-day descendants as Te Tai o Poutini, as a Site of Significance to them.

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The Proprietors of Mawhera Tiamana Mawhera Incorporation (S621)	S621.035	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori	Amend	opposes the proposed sectionalizing of Te Tai o Poutini into Sites of Significant to Maori	All the land and all the lands constituent components, mountains, water, forests, flora and fauna within the boundaries of the 1860 Arahura Deed of Purchase is ancestral land to the present day iwi who are descendants of the individual iwi that were allocated as owners of the Native Reserves by the 1879 Young Commission.
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.113	Sites and Areas of Significance to Māori	Overview	Amend	Under the Ngāi Tahu (Pounamu Vesting) Act 1997, pounamu is owned by Te Rūnanga o Ngāi Tahu.	Amend as follows: Pounamu and Aotea management areas. Pounamu and Aotea are taonga of Poutini Ngāi Tahu. Under the Pounamu Vesting Act, all pounamu on the West Coast/Tai o Poutini is owned by <del>Poutini</del> <b>Te Rūnanga o Ngāi Tahu</b> .
The Proprietors of Mawhera Tiamana Mawhera Incorporation (S621)	S621.017	Sites and Areas of Significance to Māori	Overview	Amend	Mawhera Inc. does not recognise the Mana Whakahono a Rohe that council's acknowledge.	Amend to include other groups that possess manawhenua status within Te Tai o Poutini rohe.
The Proprietors of Mawhera Tiamana Mawhera Incorporation (S621)	S621.018	Sites and Areas of Significance to Māori	Overview	Amend	Mawhera Inc. submits it has a legislative mandated authority to represent the iwi that are part of Mawhera Inc.	Consequential amendment from Tangata Whenua definition
The Proprietors of Mawhera Tiamana Mawhera Incorporation (S621)	S621.019	Sites and Areas of Significance to Māori	Overview	Amend	A deed between Te Runanga o Kai Tahu and The Proprietors of Mawhera was executed on the 23 September 1997 vesting all Pounamu within the catchment of the Arahura river in The Proprietors of Mawhera.	Amend to read that vesting all Pounamu within the catchment of the Arahura river is vested in The Proprietors of Mawhera.
The Proprietors of Mawhera Tiamana Mawhera Incorporation (S621)	S621.020	Sites and Areas of Significance to Māori	Overview	Amend	3rd Paragraph. 1 & 2 makes reference to Poutini Kai Tahu. Who is the reference meant for, Poutini Kai Tahu the iwi or Poutini Kai Tahu the Mana Whakahono a Rohe group.	Consequential amendment from definition of Poutini Ngai Tahu

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The Proprietors of Mawhera Tiamana Mawhera Incorporation (S621)	S621.021	Sites and Areas of Significance to Māori	Overview	Amend	Confusing with the listed activities as it is not clear for who the activities will benefit (ie) Poutini Kaitahu the iwi or Poutini Kaitahu the Mana Whakahono a Rohe group and who of Poutini iwi will be consulted to implement the activities.	Subsequent amendment from Poutini Ngai Tahu definition Amend to read Sites and Areas of Significance <del>to Māori</del> <b>Poutini Kai Tahu iwi</b>
J P Parsons (S335)	S335.001	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori Objectives	Amend	<p>I support the concept of increasing the general public's knowledge of Sites of Significance to Māori, and the encouragement to engage with Rūnanga, however I am very concerned at the lack of detail and guidance over how to do this (engage with Poutini Ngāi Tahu Rūnanga) and how the Objectives, Policies and Rules might be interpreted in the future.</p> <p>Current wording is extremely broad brush and implies or could be interpreted as requiring granting of unconditional access and prevention of any development.</p> <p>I am concerned at the impact of how vague wording may be interpreted by administrators in the future and the negative impact of uncertainty and diminished property values for landowners due to potential restrictions on previously non-notifiable activities.</p>	Define and add conditions to the many broad brush statements that could be open to varied interpretation by decision makers in the future. Provide a process for appropriate engagement with Rūnanga. Please see attached 'large submitter template' for details.
Buller District Council (S538)	S538.176	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori Objectives	Support	Council supports the objectives and policies for Sites and Areas of Significance to Māori. However SASM-P11 refers to 'hazardous facilities' and 'offensive industries' with these activities to be avoided within the scheduled sites/areas. To ensure consistency of outcomes, Council seeks a definition of what would be considered a 'hazardous facility' or 'offensive industry'.	Retain as notified.  Insert a definition of 'hazardous facility' or 'offensive industry' into the Definition Section.

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Chris & Jan Coll (S558)	S558.069	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori Objectives	Support		Retain
Chris J Coll Surveying Limited (S566)	S566.069	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori Objectives	Support		Retain
William McLaughlin (S567)	S567.153	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori Objectives	Support		Retain
Laura Coll McLaughlin (S574)	S574.069	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori Objectives	Support		Retain
David Ellerm (S581)	S581.020	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori Objectives	Support	Support Sites and Areas of Significance to Māori Objectives and Policies	Retain
Kirsty Henderson (S125)	S125.005	Sites and Areas of Significance to Māori	SASM - O1	Oppose	Private freehold land should not be used to redress tino rangatiratanga and kaitiakitanga. Redress issues need to be addressed at Central Government level and not by certain individual landowners who now find the land they bought in good faith has a sudden new restrictive classification.	SASM-01 should be removed.
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.274	Sites and Areas of Significance to Māori	SASM - O1	Support	We support this objective.	Retain objective.
Helen Carter (S209)	S209.002	Sites and Areas of Significance to Māori	SASM - O1	Amend	I have concerns about this wording: Recognise and provide for the exercise of tino rangatiratanga and kaitiakitanga by Poutini Ngāi Tahu in decisions made in relation to identified sites and areas of significance in Schedule Three.	Reword objective to remove reference to Tino rangatiratanga

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					My understanding of tino rangatiratanga is that it can mean "full exclusive and undisturbed possession" of the land as well as potentially "domination", "control", "rule", "power". Am I happy that another group of people are wanting to use this language in relation to land I own? No. This needs to be re-worded. Adding in Ngai Tahu to every decision in governance would seem to me to be impractical, time consuming, expensive and not really allowing for the smooth running of the local authority.	
Stephen Page (S270)	S270.019	Sites and Areas of Significance to Māori	SASM - O1	Oppose	As a none Te Reo speaker, why am I obliged to search for translations in order to discover Poutini Ngai Tahu's objectives under the proposed SASMs?	Objective to be written entirely in English
Kirsty Henderson (S125)	S125.006	Sites and Areas of Significance to Māori	SASM - O2	Oppose in part	Ngai Tahu should not be given blanket access to all SASM land. This is totally unreasonable to landowners, the clause is not restrictive, gives no need for consultation to landowners as to when,why, how long they wish to have access. Can all Ngai Tahu freely access SASM land?	Amend SASM-02 so that free range to NgaiTahu to access, maintain and use any land within the SASM classification is changed to periodic access after consultation with landowners for reasonable access to particularly important areas.
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.275	Sites and Areas of Significance to Māori	SASM - O2	Support	We support this objective.	Retain objective.
Helen Carter (S209)	S209.003	Sites and Areas of Significance to Māori	SASM - O2	Amend	I am concerned about this wording: Poutini Ngāi Tahu are able to access, maintain and use areas and resources of cultural value within identified sites, areas and cultural landscapesWhereas I understand the intentions behind this statement this effectively gives Ngai Tahu the right to access my property. Putting in	Amend Objective 2 so this excludes private land.

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					place vague legalities could end up causing issues in the future. This suggests that Ngai Tahu have the right (legal right?) to access my property if they choose, for food gathering, cultural activities and have absolute authority over my land. There's probably no good reason that this would ever happen, but why then put it in a document? This needs to be changed.	
Stephen Page (S270)	S270.006	Sites and Areas of Significance to Māori	SASM - O2	Oppose	Why should Poutini Ngai Tahu be granted such power over these sites and areas based on their own definitions of what constitutes cultural value? These sites and areas were never before considered or identified as SASMs by Poutini Ngai Tahu until central government directed councils to do likewise.	Couldn't the access, maintenance and use of these SASM's be decided by the Maori Land Courts and thus prevent another layer of expensive bureaucracy being imposed on property owners?
Te Tumu Paeroa - The office of the Māori Trustee (S440)	S440.017	Sites and Areas of Significance to Māori	SASM - O2	Support in part	<p>The Māori Trustee is generally comfortable with the objectives in the 'Sites and Areas of significance to Māori' chapter.</p> <p>The Māori Trustee supports Poutini Ngāi Tahu ability to access, maintain and use areas and resources of cultural value. However, as sites of significance to Māori are currently mapped on the E-Plan over entire property records of titles, including private land, an 'in agreement with affected landowners' qualifier is needed.</p> <p>The Māori Trustee also considers that the Te Tai o Poutini E-Plan needs to clearly identify the extent of sites of significance to Māori as they currently appear to be across entire property records of title.</p>	<p>The Māori Trustee considers that the Te Tai o Poutini E-Plan needs to clearly identify the extent of sites of significance to Māori as they currently appear to be across entire property records of title. The Māori Trustee considers that the following amendment needs to be made to objective SASM O2.</p> <p>Amendments O2. Poutini Ngāi Tahu are able to, <b>in agreement with affected landowners</b>, access, maintain and use areas and resources of cultural value within identified sites, areas and cultural landscapes.</p>

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Horticulture New Zealand (S486)	S486.025	Sites and Areas of Significance to Māori	SASM - O2	Support in part	It should be clear that the objective applies to the use of identified sites areas and cultural landscapes. The proposed wording implies access over private property.	Amend SASM-O2 Poutini Ngai Tahu are able to <del>use access</del> areas and resources of cultural value within identified sites, areas and cultural landscapes.
Federated Farmers of New Zealand (S524)	S524.048	Sites and Areas of Significance to Māori	SASM - O2	Support in part	Federated Farmers supports the intentions behind the objective. As we understand from schedule 3 none of the land is on private land apart from Poutini Ngai Tahu land, but access to some of the actual sites would require crossing of private land to get to the site. Federated Farmers concern here would be how this objective could potentially be applied if extended to private land. All farms have strict health and safety requirements and animal welfare considerations. Farms also may have fenced off waterways and have riparian plantings. Farms are also sites of multiple potential hazards. Any access to private land needs to be via engagement and agreement with landowners.	Amend SASM-O2 to ensure that were sites are on private property access is required from the landowner.
Grey District Council (S608)	S608.013	Sites and Areas of Significance to Māori	SASM - O2	Support	It is inappropriate to allow unfettered access	Remove 'access' from Objective
Kirsty Henderson (S125)	S125.007	Sites and Areas of Significance to Māori	SASM - O3	Oppose in part	SASM-03 and following list of inappropriate activities gives insufficient clarification as to what is inappropriate subdivision, use and development; how long the consultation may take; how much it may cost and leaves it open for activities to be unreasonably denied. Can it be denied based on commercial reasons i.e competition. Ngai Tahu has significant commercial interests and this leaves it open for them to deny	Provide clarification on what is Inappropriate subdivision, use and development.

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					permission to prevent commercial competition.	
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.276	Sites and Areas of Significance to Māori	SASM - O3	Support	We support this objective.	Retain objective.
Stephen Page (S270)	S270.007	Sites and Areas of Significance to Māori	SASM - O3	Oppose	SASM - O3 Does Poutini Ngai Tahu define what is 'inappropriate'? Will landowners be permitted to challenge these definitions in court?	Ensure landowners can challenge Poutini Ngai Tahu definitions of "inappropriate" activities.
TiGa Minerals and Metals Limited (S493)	S493.032	Sites and Areas of Significance to Māori	SASM - O3	Amend	These sites often coincide with beach locations and mineral sand deposits.	Amend SASM - O3 as follows: The values of sites and areas of significance to Māori and cultural landscapes are protected <del>from</del> <b>by managing adverse effects associated with</b> inappropriate subdivision, use and development including inappropriate modification, demolition or destruction.
Westpower Limited (S547)	S547.203	Sites and Areas of Significance to Māori	SASM - O3	Support	Support the objective as it seeks to provide for appropriate activities.	Retain
WMS Group (HQ) Limited and WMS Land Co. Limited (S599)	S599.036	Sites and Areas of Significance to Māori	SASM - O3	Amend	Sites often coincide with beach locations and mineral sand deposits.	Amend SASM - O3 as follows: The values of sites and areas of significance to Māori and cultural landscapes are protected <del>from</del> <b>by managing adverse effects associated with</b> inappropriate subdivision, use and development including inappropriate modification, demolition or destruction."
Birchfield Ross Mining Limited (S604)	S604.021	Sites and Areas of Significance to Māori	SASM - O3	Amend	To provide a consenting pathway for these activities.	Amend SASM - O3 as follows: The values of sites and areas of significance to Māori and cultural landscapes are protected <del>from</del> <b>by managing adverse effects associated with</b> inappropriate subdivision, use and development including inappropriate modification, demolition or



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						destruction.
Buller District Council (S538)	S538.177	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori Policies	Support	Council supports the objectives and policies for Sites and Areas of Significance to Māori. However SASM-P11 refers to 'hazardous facilities' and 'offensive industries' with these activities to be avoided within the scheduled sites/areas. To ensure consistency of outcomes, Council seeks a definition of what would be considered a 'hazardous facility' or 'offensive industry'.	Retain as notified.  Insert a definition of 'hazardous facility' or 'offensive industry' into the Definition Section.
Buller Conservation Group (S552)	S552.056	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori Policies	Amend	SASM P13 amend to for consistency with R4	Amend SASM - P13 (d) which allows indigenous vegetation clearance, <b>subject to other rules and regulations around indigenous vegetation clearance</b>
Frida Inta (S553)	S553.056	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori Policies	Amend	SASM P13 amend to for consistency with R4	Amend SASM - P13 (d) which allows indigenous vegetation clearance, <b>subject to other rules and regulations around indigenous vegetation clearance</b>
David Ellerm (S581)	S581.021	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori Policies	Support	Support Sites and Areas of Significance to Māori Objectives and Policies	Retain
Heritage New Zealand Pouhere Taonga (S140)	S140.033	Sites and Areas of Significance to Māori	SASM - P1	Support	HNZPT supports SASM-P1 which seeks to protect the values of significant sites and cultural landscapes from the adverse effects of subdivision, use and development while enabling their values to be enhanced through ongoing Poutini Ngāi Tahu access and cultural use.	Retain as proposed
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.277	Sites and Areas of Significance to Māori	SASM - P1	Support	We support this policy.	Retain policy.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
TiGa Minerals and Metals Limited (S493)	S493.033	Sites and Areas of Significance to Māori	SASM - P1	Amend	Amendment for consistency with proposed amendments to SASM-O3.	Amend: Protect Poutini Ngāi Tahu cultural landscapes from <b>significant</b> adverse effects of <b>inappropriate</b> subdivision, use and development while enabling their values to be enhanced through ongoing Poutini Ngāi Tahu access and cultural use.
Westpower Limited (S547)	S547.204	Sites and Areas of Significance to Māori	SASM - P1	Amend	Amendment is required for consistency with Objective 3.	Amend Protect Poutini Ngai Tahu cultural landscapes from adverse effects of <b>inappropriate</b> subdivision, use while ... access and cultural use.
Chris & Jan Coll (S558)	S558.070	Sites and Areas of Significance to Māori	SASM - P1	Support		Retain
Chris J Coll Surveying Limited (S566)	S566.070	Sites and Areas of Significance to Māori	SASM - P1	Support		Retain
William McLaughlin (S567)	S567.154	Sites and Areas of Significance to Māori	SASM - P1	Support		Retain
Laura Coll McLaughlin (S574)	S574.070	Sites and Areas of Significance to Māori	SASM - P1	Support		Retain
WMS Group (HQ) Limited and WMS Land Co. Limited (S599)	S599.037	Sites and Areas of Significance to Māori	SASM - P1	Amend	Consistency with SASM - O3	Amend SASM - P1 as follows: Protect Poutini Ngāi Tahu cultural landscapes from <b>significant</b> adverse effects of <b>inappropriate</b> subdivision, use and development while enabling their values to be enhanced through ongoing Poutini Ngāi Tahu access and cultural use.
Birchfield Ross Mining Limited (S604)	S604.022	Sites and Areas of Significance to Māori	SASM - P1	Amend	For consistency with SASM - O3	Amend SASM - P1 as follows: Protect Poutini Ngāi Tahu cultural landscapes from <b>significant</b> adverse effects of <b>inappropriate</b> subdivision, use and development while enabling their values to be enhanced through ongoing Poutini Ngāi Tahu access and cultural use.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Grey District Council (S608)	S608.014	Sites and Areas of Significance to Māori	SASM - P1	Amend	It is inappropriate to allow unfettered access	Remove 'access' from Policy
Amy Paterson (S128)	S128.003	Sites and Areas of Significance to Māori	Identification and access to significant sites and areas	Amend		Request for more information about the identification of SASM.
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.278	Sites and Areas of Significance to Māori	SASM - P2	Support	We support this policy.	Retain policy.
Stephen Page (S270)	S270.008	Sites and Areas of Significance to Māori	SASM - P2	Oppose	SASM - P2 . Does Poutini Ngai Tahu wish to search and locate more than the 216 SASMs they have already identified in this proposed TTPP?	Clarify process for identification of any further SASM.
Federated Farmers of New Zealand (S524)	S524.049	Sites and Areas of Significance to Māori	SASM - P2	Support in part	The values that are set out in Schedule Three and referred to in the policy have no explanation. It would assist plan users, especially those with a SASM identified on their property, to understand what the "identified values" are and their significance to Poutini Ngāi Tahu. For example a property with the identified value "kainga sites" requires further explanation. Further, where the SASM is shown on the planning maps as a large area encompassing entire blocks of land - does this mean there is value associated with the entire block, or are there better defined/identified/mapped areas to assist the landowner to understand the activities that have occurred on the land and the values that are seeking to be protected, and therefore where and why there are sites to protect and/or avoid.	Add explanation and clarification for these values and sites.

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Westpower Limited (S547)	S547.205	Sites and Areas of Significance to Māori	SASM - P2	Amend	Amended to focus on identification to avoid issues between policies.	Amend: Work with Poutini Ngai Tahu to identify and list sites and areas of significance to Poutini Ngai Tahu in Schedule Three. <del>and protect the identified values of the sites and areas</del>
Chris & Jan Coll (S558)	S558.071	Sites and Areas of Significance to Māori	SASM - P2	Support		Retain
Chris J Coll Surveying Limited (S566)	S566.071	Sites and Areas of Significance to Māori	SASM - P2	Support		Retain
William McLaughlin (S567)	S567.155	Sites and Areas of Significance to Māori	SASM - P2	Support		Retain
Laura Coll McLaughlin (S574)	S574.071	Sites and Areas of Significance to Māori	SASM - P2	Support		Retain
Grey District Council (S608)	S608.015	Sites and Areas of Significance to Māori	SASM - P2	Support	Council is supportive of iwi regaining kaitiakitanga and rangatiratanga	Retain as notified
Heritage New Zealand Pouhere Taonga (S140)	S140.034	Sites and Areas of Significance to Māori	SASM - P3	Support in part	HNZPT recommends that the ADP is only adopted where an Archaeological Authority has not been issued by HNZPT.	HNZPT requests the wording of SASM-P3 be amended: b. Upon accidental discovery of kōiwi (skeletal remains) or urupā ensure that the Accidental Discovery Protocol in Appendix Four is followed, <b>unless an Archaeological Authority has been issued by Heritage New Zealand Pouhere Taonga.</b>
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.279	Sites and Areas of Significance to Māori	SASM - P3	Support	We support this policy.	Retain policy.
Stephen Page (S270)	S270.009	Sites and Areas of Significance to Māori	SASM - P3	Oppose	SASM - P3 Wouldn't the police be called first in the event of the accidental discovery of skeletal remains? I thought that they would have primary responsibility for deciding what happened to any human remains that were discovered?	Amend to reflect that contacting the police should be the first activity in relation to discovery of human remains.

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Herenga ā Nuku Aotearoa Outdoor Access Commission (S274)	S274.005	Sites and Areas of Significance to Māori	SASM - P3	Support	Support the identification of Poutini Ngāi Tahu Cultural Landscapes and provide for their protection through the use of overlays and Plan provisions.	Retain POU-P3 as in the proposed Plan.
Chris & Jan Coll (S558)	S558.072	Sites and Areas of Significance to Māori	SASM - P3	Support		Retain
Chris J Coll Surveying Limited (S566)	S566.072	Sites and Areas of Significance to Māori	SASM - P3	Support		Retain
William McLaughlin (S567)	S567.156	Sites and Areas of Significance to Māori	SASM - P3	Support		Retain
Laura Coll McLaughlin (S574)	S574.072	Sites and Areas of Significance to Māori	SASM - P3	Support		Retain
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.114	Sites and Areas of Significance to Māori	SASM - P3	Amend	Policy needs to amended to also include accidentally discovered taonga.	Upon accidental discovery of kōiwi (skeletal remains), <del>or</del> urupā <b>and/or taonga</b> , ensure that the Accidental Discovery Protocol in Appendix Four is followed.
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.280	Sites and Areas of Significance to Māori	SASM - P4	Support	We support this policy.	Retain policy.
Stephen Page (S270)	S270.010	Sites and Areas of Significance to Māori	SASM - P4	Oppose	SASM - P4 What would happen in the event that informal arrangements or understandings were unable to be achieved? Could the courts become involved in order to enforce a 'formal arrangement' between landowners and Poutini Ngai Tahu, and if so who would be liable for the costs of such legal action?	Clarify process if informal arrangements under this policy are unable to be achieved.
Horticulture New Zealand (S486)	S486.026	Sites and Areas of Significance to Māori	SASM - P4	Support	HortNZ supports recognition of informal arrangements for access to identified sites and areas of significant to Ngai Tahu.	Retain SASM-P4

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Federated Farmers of New Zealand (S524)	S524.050	Sites and Areas of Significance to Māori	SASM - P4	Support	This policy recognises that there needs to be an arrangement with the landowner as a party before private land is accessed. We support council taking a facilitative approach that recognises landowner concerns and the practical issues with access while recognizing the concerns of Poutini Ngāi Tahu	Retain as notified.
Chris & Jan Coll (S558)	S558.073	Sites and Areas of Significance to Māori	SASM - P4	Support		REtain
Chris J Coll Surveying Limited (S566)	S566.073	Sites and Areas of Significance to Māori	SASM - P4	Support		REtain
William McLaughlin (S567)	S567.157	Sites and Areas of Significance to Māori	SASM - P4	Support		REtain
Laura Coll McLaughlin (S574)	S574.073	Sites and Areas of Significance to Māori	SASM - P4	Support		REtain
Grey District Council (S608)	S608.016	Sites and Areas of Significance to Māori	SASM - P4	Amend	The process of formal access arrangements must be via a shared process.	Retain as notified
The Proprietors of Mawhera Tiamana Mawhera Incorporation (S621)	S621.027	Sites and Areas of Significance to Māori	Poutini Ngāi Tahu Roles	Oppose	Mawhera Inc. possess the exclusive right of those values that exist relating to the properties that the incorporation owns and manages.	Amend to state that <b>Mawhera Inc. possess the exclusive right of Rakatirataka, Kaitiakitaka, Muri, Mahika Kai Ki Uta Ki Tai, Waihi Tapu, Taoka, and Resources of Significance.values over the properties that Mawhera own and manage</b>
Kirsty Henderson (S125)	S125.008	Sites and Areas of Significance to Māori	SASM - P5	Oppose	Clarification on level of tino rangatiratanga and kaitiatanga for private land owners decision-making. The use of tino rangatiratanga and kaitiatanga needs to be fully translated and explained. These terms are non commonly used in English and it is absolutely necessary for all parties with this classification to know what is actually means in this context.	Provide clarification of what tino rangatiratanga and kaitiatanga means in regard to SASM and particularly to private landowners in SASM 31 and SASM 32.

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Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.281	Sites and Areas of Significance to Māori	SASM - P5	Support	We support this policy.	Retain policy.
Te Tumu Paeroa - The office of the Māori Trustee (S440)	S440.018	Sites and Areas of Significance to Māori	SASM - P5	Support in part	<p>The Māori Trustee is generally comfortable with the policies in the 'Sites and Areas of significance to Māori' chapter.</p> <p>The Māori Trustee supports Poutini Ngāi Tahu exercising their tino rangatiratanga and kaitiakitanga in relation to identified sites and areas of significance in Schedule Three. However, the Māori Trustee notes that not all Māori landowners are registered members of Poutini Ngāi Tahu.</p> <p>As SASM P5 currently reads, Māori landowners will be precluded in Te Tai o Poutini from having tino rangatiratanga and kaitiakitanga of their whenua and the sites and areas of significance located on them. The Māori Trustee respects Poutini Ngāi Tahu as mana whenua and kaitiaki of their land, however, Māori landowners are entitled to and cannot be allowed to be precluded from making decisions in relation to the identified sites in Schedule Three that are located on their land.</p>	<p>The Māori Trustee considers that the following amendment needs to be made policy SASM P5.</p> <p>Amendments P5. Recognise and provide for the exercise of tino rangatiratanga and kaitiakitanga by Poutini Ngāi Tahu and Māori landowners in decisions made in relation to identified sites and areas of significance in Schedule Three.</p>
Chris & Jan Coll (S558)	S558.074	Sites and Areas of Significance to Māori	SASM - P5	Support		Retain
Chris J Coll Surveying Limited (S566)	S566.074	Sites and Areas of Significance to Māori	SASM - P5	Support		Retain

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William McLaughlin (S567)	S567.158	Sites and Areas of Significance to Māori	SASM - P5	Support		Retain
Laura Coll McLaughlin (S574)	S574.074	Sites and Areas of Significance to Māori	SASM - P5	Support		Retain
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.282	Sites and Areas of Significance to Māori	SASM - P6	Support	We support this policy.	Retain policy.
TiGa Minerals and Metals Limited (S493)	S493.034	Sites and Areas of Significance to Māori	SASM - P6	Amend	To ensure that unintentional disturbance through mineral extraction is not captured.	Amend: Within the Pounamu and Aotea Management overlay, enable tino rangatiratanga and kaitiakitanga of the pounamu and aotea resource by Poutini Ngāi Tahu and avoid the <b>intentional</b> disturbance or <b>intentional</b> removal of this resource by non-hapū members.
Chris & Jan Coll (S558)	S558.075	Sites and Areas of Significance to Māori	SASM - P6	Support		Retain
Chris J Coll Surveying Limited (S566)	S566.075	Sites and Areas of Significance to Māori	SASM - P6	Support		Retain
William McLaughlin (S567)	S567.159	Sites and Areas of Significance to Māori	SASM - P6	Support		Retain
Minerals West Coast (S569)	S569.020	Sites and Areas of Significance to Māori	SASM - P6	Amend	Adversely affect those alluvial gold miners who are non-Māori and mine pounamu as a by-product for local iwi under an arrangement between the parties	Within the Pounamu and Aotea Management overlay, enable tino rangatiratanga and kaitiakitanga of the pounamu and aotea resource by Poutini Ngāi Tahu, <b>or their authorised representatives or contractors</b> , and avoid the disturbance or removal of this resource by non-hapū members.
Laura Coll McLaughlin (S574)	S574.075	Sites and Areas of Significance to Māori	SASM - P6	Support		Retain



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WMS Group (HQ) Limited and WMS Land Co. Limited (S599)	S599.038	Sites and Areas of Significance to Māori	SASM - P6	Amend	Clarified to ensure that unintentional disturbance through mineral extraction is not captured by this policy.	Amend SASM - P6 as follows: Within the Pounamu and Aotea Management overlay, enable tino rangatiratanga and kaitiakitanga of the pounamu and aotea resource by Poutini Ngāi Tahu and avoid the <b>intentional</b> disturbance or <b>intentional</b> removal of this resource by non-hapū members.
Birchfield Coal Mines Ltd (S601)	S601.030	Sites and Areas of Significance to Māori	SASM - P6	Amend	Should be clarified to ensure that unintentional disturbance is not captured by this policy.	Amend SASM - P6 as follows: "Within the Pounamu and Aotea Management overlay, enable tino rangatiratanga and kaitiakitanga of the pounamu and aotea resource by Poutini Ngāi Tahu and <del>avoid</del> <b>minimise the potential for the unintentional</b> disturbance or removal of this resource by non-hapū members.
Birchfield Ross Mining Limited (S604)	S604.023	Sites and Areas of Significance to Māori	SASM - P6	Amend	The policy should be clarified to ensure that unintentional disturbance is not captured by this policy.	Amend SASM - P6 as follows: "Within the Pounamu and Aotea Management overlay, enable tino rangatiratanga and kaitiakitanga of the pounamu and aotea resource by Poutini Ngāi Tahu and avoid the <b>intentional</b> disturbance or <b>intentional</b> removal of this resource by non-hapū members.
Kenneth Doig (S172)	S172.002	Sites and Areas of Significance to Māori	Management of Activities on Identified Significant Sites and Areas	Amend	There should not be a one size fits all approach with regards to development and mining - SASM - P11 (point a) and SASM R7 (point 3). The rights to mine certain areas such as privately owned Victorian Title land should not need to be approved by Poutini Ngāi Tahu rūnanga. Please include the wording With the exception of privately owned Victorian Title Land	Amend P7 and P11 to recognise privately owned Victorian Title Land.
Heritage New Zealand Pouhere Taonga (S140)	S140.035	Sites and Areas of Significance to Māori	SASM - P7	Support	HNZPT supports the measures in SASM - P7 to P9 identifying practical methods to manage activities on significant sites.	Retain as proposed

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Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.283	Sites and Areas of Significance to Māori	SASM - P7	Support	We support this policy.	Retain policy.
Stephen Page (S270)	S270.011	Sites and Areas of Significance to Māori	SASM - P7	Oppose	SASM - P7 Who defines what an 'inappropriate activity' is? What exactly are these values, interests and associations? If they are challenged by landowners will they be permitted to do so in a court of law?	Clarify what is an "inappropriate activity" and what are the values, interests and associations referred to in this policy.
TiGa Minerals and Metals Limited (S493)	S493.035	Sites and Areas of Significance to Māori	SASM - P7	Amend	A wording amendment is proposed to reflect changes requested to SASM - O3.	Amend SASM - P7 as follows: Protect and maintain sites and areas of significance to Māori from adverse effects by: a. ... b. Requiring activities on sites and areas of significance to Māori to <del>minimise</del> <b>manage</b> adverse effects on cultural, spiritual and/or heritage values, interests or associations of importance to Poutini Ngāi Tahu.
Westpower Limited (S547)	S547.206	Sites and Areas of Significance to Māori	SASM - P7	Amend	Should be amended to reflect the management approach taken.	Amend: b. Requiring activities on sites and areas of significance to Maori to <del>minimise</del> <b>avoid, remedy or mitigate</b> adverse effects on cultural, spiritual and/or heritage values, interests or associations of importance to Poutini Ngai Tahu.
WMS Group (HQ) Limited and WMS Land Co. Limited (S599)	S599.039	Sites and Areas of Significance to Māori	SASM - P7	Amend	A wording amendment is proposed to reflect changes requested to SASM - O3.	Amend SASM - P7 as follows: Protect and maintain sites and areas of significance to Māori from adverse effects by:  a. Ensuring identified sites and areas of significance to Māori are not disturbed, destroyed, removed and/or visually encroached upon by inappropriate activities; and  b. Requiring activities on sites and areas of significance to Māori to <del>minimise</del> <b>manage</b> adverse effects on cultural, spiritual and/or heritage values, interests or associations of importance to

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						Poutini Ngāi Tahu.
Birchfield Ross Mining Limited (S604)	S604.024	Sites and Areas of Significance to Māori	SASM - P7	Amend	To reflect changes requested to SASM - O3.	Amend SASM - P7 as follows: Protect and maintain sites and areas of significance to Māori from adverse effects by: a. Ensuring identified sites and areas of significance to Māori are not disturbed, destroyed, removed and/or visually encroached upon by inappropriate activities; and b. Requiring activities on sites and areas of significance to Māori to <b>minimise manage</b> adverse effects on cultural, spiritual and/or heritage values, interests or associations of importance to Poutini Ngāi Tahu.
Grey District Council (S608)	S608.017	Sites and Areas of Significance to Māori	SASM - P7	Amend	Use of "minimise" rather than "mitigate" changes the focus and possibly the intent	Change 'minimise' to 'mitigate'
Heritage New Zealand Pouhere Taonga (S140)	S140.036	Sites and Areas of Significance to Māori	SASM - P8	Support	HNZPT supports the measures in SASM - P7 to P9 identifying practical methods to manage activities on significant sites.	Retain as proposed
Heritage New Zealand Pouhere Taonga (S140)	S140.038	Sites and Areas of Significance to Māori	SASM - P8	Oppose in part	HNZPT recommends that the ADP is only adopted where an Archaeological Authority has not been issued by HNZPT.	HNZPT requests the wording of SASM-P8 be amended: b. The accidental discovery protocol in Appendix Four is adopted for any earthworks <b>unless an Archaeological Authority has been issued by Heritage New Zealand Pouhere Taonga;</b>
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.284	Sites and Areas of Significance to Māori	SASM - P8	Support	We support this policy.	Retain policy.
Transpower New Zealand Limited (S299)	S299.024	Sites and Areas of Significance to Māori	SASM - P8	Support	Transpower supports the approach outlined in this policy where an activity is proposed within a Schedule Three area, but requests that clause c. provides for 'operational need' alongside 'functional need'. This recognises that the location in which some activities are able to take	Amend the policy as follows: SASM - P8 Where an activity is proposed within any site or area of significance to Māori identified in Schedule Three ensure that: Engagement with Poutini Ngāi Tahu occurs to ensure that effects of the activity on the values of the site or area are understood; The accidental discovery

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					place are severely limited due to operational constraints, and, via clause d. continues to require that the values of the site are protected, maintained or enhanced.	protocol in Appendix Four is adopted for any earthworks; Any adverse effects on identified values are avoided, unless it can be demonstrated that due to the functional needs <b>or operational need</b> of the activity it is not possible to avoid all adverse effects; and Any residual effects that cannot be practicably avoided are mitigated in a way that protects, maintains or enhances the values of the site or area
TiGa Minerals and Metals Limited (S493)	S493.036	Sites and Areas of Significance to Māori	SASM - P8	Amend	Should also recognise that activities may have an operational need to locate in areas.	Amend SASM - P8 as follows: Where an activity is proposed within any site or area of significance to Māori identified in Schedule Three ensure that: a. ...; c. Any adverse effects on identified values are avoided, unless it can be demonstrated that due to the functional <b>or operational</b> needs of the activity it is not possible to avoid all adverse effects; and d. ...
Westpower Limited (S547)	S547.208	Sites and Areas of Significance to Māori	SASM - P8	Amend	Wording of item c. requires amendment to, (1) Require avoidance "where practicable" to be consistent with the managed approach, and reworded in regard to "constraints and requirements" to be consistent with wording elsewhere in the plan, and the RPS. (2) Given recognition that total avoidance is not possible protection should be replaced with "manages effects on" in item "d.". These amendments are submitted as being reflective of the active management approach proposed in rules.	(1) Amend item c., "c. Any adverse effects are on ... are avoided <b>where practicable</b> , unless it can be demonstrated that due to the <b>technical, locational, functional or operational constraints or requirements</b> of the activity ... adverse effects." (2) Amend item d., Amend d. Any residual effect ...mitigated in a way that <b>manages effects on, and where practicable protects</b> maintains or enhances, the values of the site or area.

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WMS Group (HQ) Limited and WMS Land Co. Limited (S599)	S599.040	Sites and Areas of Significance to Māori	SASM - P8	Amend	Should also recognise that activities may have an operational need to locate within these areas.	Amend SASM - P8 as follows: Where an activity is proposed within any site or area of significance to Māori identified in Schedule Three ensure that:  a. Engagement with Poutini Ngāi Tahu occurs to ensure that effects of the activity on the values of the site or area are understood;  b. The accidental discovery protocol in Appendix Four is adopted for any earthworks; c. Any adverse effects on identified values are avoided, unless it can be demonstrated that due to the functional <b>or operational</b> needs of the activity it is not possible to avoid all adverse effects; and d. Any residual effects that cannot be practicably avoided are mitigated in a way that protects, maintains or enhances the values of the site or area.
Department of Conservation (S602)	S602.057	Sites and Areas of Significance to Māori	SASM - P8	Amend	Support Policy SASAM-P8 and amend it to also require engagement with HNZPT where the site is also an archaeological site or contains a heritage item, as significant cultural sites and significant heritage sites are not mutually exclusive.	Amend: Where an activity is proposed within any site or area of significance to Māori identified in Schedule Three ensure that: a. Engagement with Poutini Ngāi Tahu occurs to ensure that effects of the activity on the values of the site or area are understood; b. <b>If the site is an archaeological site and/or contains a heritage item, engagement also occurs with Heritage New Zealand - Pouhere Taonga;..</b>
Birchfield Ross Mining Limited (S604)	S604.025	Sites and Areas of Significance to Māori	SASM - P8	Amend	Should also recognise that activities may have an operational need to locate	Amend SASM - P8 as follows: Where an activity is proposed within any site or area of significance to Māori identified in Schedule Three ensure that: a. ...; c. Any adverse effects on identified values are avoided, unless it can be demonstrated that due to the functional <b>or operational</b> needs of the activity it is

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						not possible to avoid all adverse effects; and d. ...
Grey District Council (S608)	S608.018	Sites and Areas of Significance to Māori	SASM - P8	Amend	Use of "avoid" rather than "mitigate" changes the focus and possibly the intent	Change 'avoid' to 'mitigate'
Heritage New Zealand Pouhere Taonga (S140)	S140.037	Sites and Areas of Significance to Māori	SASM - P9	Support	HNZPT supports the measures in SASM - P7 to P9 identifying practical methods to manage activities on significant sites.	Retain as proposed
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.285	Sites and Areas of Significance to Māori	SASM - P9	Support	We support this policy.	Retain policy.
Westpower Limited (S547)	S547.209	Sites and Areas of Significance to Māori	SASM - P9	Amend	It is unclear if the intent is the same as managing effects.	Amend a. <b>Avoid, remedy or mitigate</b> minimise adverse effects on indigenous habitats and waterbodies.
Grey District Council (S608)	S608.019	Sites and Areas of Significance to Māori	SASM - P9	Oppose in part	Use of "minimise" rather than "mitigate" changes the focus and possibly the intent of the policy	Change 'minimise' to 'mitigate'
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.286	Sites and Areas of Significance to Māori	SASM - P10	Support	We support this policy.	Retain policy.
Herenga ā Nuku Aotearoa Outdoor Access Commission (S274)	S274.006	Sites and Areas of Significance to Māori	SASM - P10	Support	:POU-P10: Protect Poutini Ngai Tahu taonga and cultural sites, including sites and areas of significance to Maori identified in Schedule Three while ensuring Poutini Ngāi Tahu's key role in decision making around their management. It is important to protect sites and areas with significant associations to cultural traditions, history or identity. Some of these cultural landscapes may remain to be identified. Several objectives and policies within the plan refer to cultural sites and landscapes, however, it is not clear how	Amend the Plan so that there are cross reference and notes that clarify that management of cultural sites and landscapes will not result in any loss of public access where legally available.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					cultural sites and landscapes will be defined or managed. We recommend noting within the Public Access section that management of cultural sites and landscapes will not result in any loss of public access where legally available.	
Department of Conservation (S602)	S602.058	Sites and Areas of Significance to Māori	SASM - P10	Amend	Support Policy SASAM-P10 and amend it to include disturbance of land for the installation of fence posts, as this activity has the potential to adversely affect the upper slopes and peaks of the ancestral maunga identified in Schedule Three.	Amend: Restrict buildings, structures, forestry, network utility structures, mining, and earthworks, <b>and disturbance of land for the installation of fence posts</b> on the upper slopes and peaks of ancestral maunga as identified in Schedule Three
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.287	Sites and Areas of Significance to Māori	SASM - P11	Support	We support this policy.	Retain policy.
Rocky Mining Limited (S474)	S474.038	Sites and Areas of Significance to Māori	SASM - P11	Oppose		removal of any presumptions that mineral extraction automatically results in an adverse effect, including that found in SASM-P11;
TiGa Minerals and Metals Limited (S493)	S493.037	Sites and Areas of Significance to Māori	SASM - P11	Amend	This policy is directive and seeks avoidance of mining and quarrying.	Amend SASM P11 as follows: Recognise the significance to Poutini Ngāi Tahu ..., these areas; <del>a. Mining and quarrying other than Poutini Ngāi Tahu collection of Pounamu and Aotea;</del> b. ....
WMS Group (HQ) Limited and WMS Land Co. Limited (S599)	S599.041	Sites and Areas of Significance to Māori	SASM - P11	Oppose	In some circumstances mining can be an appropriate activity within these areas.	Amend SASM P11 as follows: Recognise the significance to Poutini Ngāi Tahu of the sites and areas of significance to Māori listed in Schedule Three and protect the identified values of these sites and areas by avoiding the following activities in, or in close proximity to, these areas; <del>a. Mining and quarrying other than Poutini Ngāi Tahu collection of Pounamu and Aotea;</del>

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<p>b. Landfills and waste disposal facilities, hazardous facilities and offensive industries;</p> <p>c. Intensive indoor primary production;</p> <p>d. Cemeteries and crematoria; and</p> <p>e. Wastewater treatment plants and disposal facilities.</p>
Grey District Council (S608)	S608.020	Sites and Areas of Significance to Māori	SASM - P11	Oppose in part	Adverse effect should be on a case by case basis.	<p>Delete all wording after "sites". Policy to read: Recognise the significance to Poutini Ngāi Tahu of the sites and areas <b>of significance to Māori listed in Schedule Three and protect the identified values of these sites.</b> <del>by avoiding the following activities in, or in close proximity to, these areas;</del></p> <ol style="list-style-type: none"> <li>1. <del>Mining and quarrying other than Poutini Ngāi Tahu collection of Pounamu and Aotea;</del></li> <li>2. <del>Landfills and waste disposal facilities, hazardous facilities and offensive industries;</del></li> <li>3. <del>Intensive indoor primary production;</del></li> <li>4. <del>Cemeteries and crematoria; and</del></li> <li>5. <del>Wastewater treatment plants and disposal facilities</del></li> </ol>
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.288	Sites and Areas of Significance to Māori	SASM - P12	Support	We support this policy.	Retain policy.
TiGa Minerals and Metals Limited (S493)	S493.038	Sites and Areas of Significance to Māori	SASM - P12	Amend	May preclude mining in vast areas identified as areas of significance.	Delete SASM - P12, or amend to exclude minerals exploration, prospecting and extraction.
WMS Group (HQ) Limited and WMS Land Co. Limited (S599)	S599.042	Sites and Areas of Significance to Māori	SASM - P12	Oppose	Areas identified coincide with valuable mineral sand resources	Delete SASM - P12, or amend to exclude minerals exploration, prospecting and extraction.



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Kirsty Henderson (S125)	S125.004	Sites and Areas of Significance to Māori	SASM - P13	Oppose in part	SASM - P13 references Schedule 3 which for Punakaiki Area SASM 31 and SASM 32 have nothing in the Category or Relevant Permitted Activity fields. Allows for demolition but not replacement of what was removed, this should be addressed. Clarification sought if upgrading of critical infrastructure includes enlarging / replacing septic tanks which is otherwise in the Inappropriate Activity list (SASM - P11).	Clarification sought on what is critical infrastructure, seems to be more to do with network power lines etc, does this include individual septic tanks and wastewater? In the absence of a town-scheme, we need to be able to replace, expand this if required
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.289	Sites and Areas of Significance to Māori	SASM - P13	Support	We support this policy.	Retain policy.
Stephen Page (S270)	S270.012	Sites and Areas of Significance to Māori	SASM - P13	Oppose	SASM - P13 Does this mean that an identified SASM covering a private property could prevent the landowner from altering, demolishing or removing a building or structure that they had themselves erected? Does that mean that Poutini Ngai Tahu have rights to the food that is growing or being farmed by the landowner? What are those identified values?	Clarify what rights to access to private property exists with SASM and what values are identified in relation to this policy.
Stephen Page (S270)	S270.020	Sites and Areas of Significance to Māori	SASM - P13	Oppose	What are those identified values?	Clarify identified values in relation to this policy.
Transpower New Zealand Limited (S299)	S299.025	Sites and Areas of Significance to Māori	SASM - P13	Support	Transpower supports an enabling policy for maintenance, operation, repair and upgrading of critical infrastructure (on the basis that this applies to the National Grid).	Retain the policy
West Coast Fish and Game Council (S302)	S302.003	Sites and Areas of Significance to Māori	SASM - P13	Support	Some of the scheduled sites and areas of significance to Poutini Ngai Tahu are public lands which provide valued conservation and	Add to P13; <b>Lawful recreational and conservation activities</b>

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					public recreation opportunities (including sports fishing and game bird hunting opportunities, e.g. Kōtukuwhakaoko /Lake Brunner, or Ōkarito Lagoon). The pTTPP should not limit or restrict such lawful public activities and should provide for them. For sites and areas which are not open to public access, conservation or recreational activities can not lawfully occur without appropriate land owner approval	
Manawa Energy Limited (Manawa Energy) (S438)	S438.070	Sites and Areas of Significance to Māori	SASM - P13	Support in part	In accordance with other submission points made, Manawa requests that the term 'critical infrastructure' is replaced with 'regionally significant infrastructure' to ensure the use of consistent terminology throughout the pTTPP.	Amend SASM - P13(b) as follows: Maintenance, operation, repair and upgrading of existing network utility structures and <del>critical</del> <b>regionally significant</b> infrastructure.
Federated Farmers of New Zealand (S524)	S524.051	Sites and Areas of Significance to Māori	SASM - P13	Support	Recognises that animal grazing can be an appropriate activity	Retain as notified.
Westpower Limited (S547)	S547.210	Sites and Areas of Significance to Māori	SASM - P13	Amend	The reference to "protection" requires amendment.	Amend: Enable activities ... spiritual values of the site or area are <del>protected</del> <b>maintained or potential effects managed</b> . This includes: ...
Westpower Limited (S547)	S547.211	Sites and Areas of Significance to Māori	SASM - P13	Amend	Requires amendment to refer to activities as set out in the plan.	Amend b. Maintenance ... upgrading of <b>existing energy activities</b> , network utility structures and critical infrastructure;
Grey District Council (S608)	S608.021	Sites and Areas of Significance to Māori	SASM - P13	Oppose in part	Adverse effect should be on a case by case basis.	Delete all wording after "protected". Policy to read: Enable activities in sites and areas of significance to Poutini Ngāi Tahu included in Schedule Three where the cultural and spiritual values of the site or area are protected.

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Grey District Council (S608)	S608.625	Sites and Areas of Significance to Māori	SASM - P13	Support	Support without alteration as the policy provides for the maintenance, operation, repair and upgrading of existing network utility structures and critical infrastructure; and small-scale earthworks for maintenance of roads and tracks	Retain as proposed.
Kirsty Henderson (S125)	S125.002	Sites and Areas of Significance to Māori	SASM - P14	Oppose	SASM - P14 is a section under Appropriate activities however the clauses that have to be regarded may make it very difficult to undergo a permitted activity.	Remove policy and provide more regard to the Land or business owners ability to improve the land is required. Address concerns regarding costs to undertake the required assessments and unclear outcomes and timeframes for iwi involvement.
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.290	Sites and Areas of Significance to Māori	SASM - P14	Support	We support this policy.	Retain policy.
Helen Carter (S209)	S209.004	Sites and Areas of Significance to Māori	SASM - P14	Amend	I am concerned about this wording Measures are taken to maintain or enhance the ability of Poutini Ngāi Tahu to access and use the site or area of significance for mahinga kai, karakia, monitoring, cultural activities and ahi kā roa. Poutini Ngāi Tahu are able to access, maintain and use areas and resources of cultural value within identified sites, areas and cultural landscapes. Whereas I understand the intentions behind this statement this effectively gives Ngai Tahu the right to access my property. Putting in place vague legalities could end up causing issues in the future. This suggests that Ngai Tahu have the right (legal right?) to access my property if they choose, for food gathering, cultural activities and have absolute authority over my land. There's probably no good reason that this would ever happen, but	Amend Policy 14 to exclude private property from provisions in relation to access and delete reference to ahi kā roa.

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					why then put it in a document? This needs to be changed.	
Stephen Page (S270)	S270.013	Sites and Areas of Significance to Māori	SASM - P14	Oppose	SASM - P14 How much land is sufficient?  What size is suitable? Will the courts decide? and What kind of measures will be taken? When and how is access allowed and who decides?	Clarify what sufficient land, size and measures that might arise from this policy and how access to private land could occur.
Te Tumu Paeroa - The office of the Māori Trustee (S440)	S440.019	Sites and Areas of Significance to Māori	SASM - P14	Support in part	The Māori Trustee supports measures being made within the Proposed Plan to maintain and enhance the ability of Poutini Ngāi Tahu to access and use the site or area of significance for mahinga kai, karakia, monitoring, cultural activities and ahi kā roa. However, as sites of significance to Māori are currently mapped on the E-Plan over entire property records of titles, including private land, an 'in agreement with affected landowners' qualifier is needed.	The Māori Trustee considers that the Te Tai o Poutini E-Plan needs to clearly identify the extent of sites of significance to Māori as they currently appear to be across entire property records of titles.  The Māori Trustee considers that the following amendment needs to be made policy SASM P14. Amendments P14(d). Measures are taken, <b>in agreement with affected landowners</b> , to maintain or enhance the ability of Poutini Ngāi Tahu to access and use the site or area of significance for mahinga kai, karakia, monitoring, cultural activities and ahi kā roa.
Leonie Avery (S507)	S507.021	Sites and Areas of Significance to Māori	SASM - P14	Oppose	I believe our properties at 81 Brougham st and 21A Domett street Westport have been wrongly/mistakenly categorised into SASM14	Delete properties from SASM14
Jared Avery (S508)	S508.021	Sites and Areas of Significance to Māori	SASM - P14	Oppose	I believe our properties at 81 Brougham st and 21A Domett street Westport have been wrongly/mistakenly categorised into SASM14	Delete properties from SASM14
Kyle Avery (S509)	S509.021	Sites and Areas of Significance to Māori	SASM - P14	Oppose	I believe our properties at 81 Brougham st and 21A Domett street Westport have been wrongly/mistakenly categorised into SASM14	Delete properties from SASM14

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Avery Bros (S510)	S510.021	Sites and Areas of Significance to Māori	SASM - P14	Oppose	I believe our properties at 81 Brougham st and 21A Domett street Westport have been wrongly/mistakenly categorised into SASM14	Delete properties from SASM14
Bradshaw Farms (S511)	S511.021	Sites and Areas of Significance to Māori	SASM - P14	Oppose	I believe our properties at 81 Brougham st and 21A Domett street Westport have been wrongly/mistakenly categorised into SASM14	Delete properties from SASM14
Paul Avery (S512)	S512.021	Sites and Areas of Significance to Māori	SASM - P14	Oppose	I believe our properties at 81 Brougham st and 21A Domett street Westport have been wrongly/mistakenly categorised into SASM14	Delete properties from SASM14
Brett Avery (S513)	S513.021	Sites and Areas of Significance to Māori	SASM - P14	Oppose	I believe our properties at 81 Brougham st and 21A Domett street Westport have been wrongly/mistakenly categorised into SASM14	Delete properties from SASM14
Steve Croasdale (S516)	S516.018	Sites and Areas of Significance to Māori	SASM - P14	Support		Retain
Chris & Jan Coll (S558)	S558.077	Sites and Areas of Significance to Māori	SASM - P14	Support		Retain
Chris J Coll Surveying Limited (S566)	S566.077	Sites and Areas of Significance to Māori	SASM - P14	Support		Retain
William McLaughlin (S567)	S567.160	Sites and Areas of Significance to Māori	SASM - P14	Support		Retain
Laura Coll McLaughlin (S574)	S574.077	Sites and Areas of Significance to Māori	SASM - P14	Support		Retain
Grey District Council (S608)	S608.022	Sites and Areas of Significance to Māori	SASM - P14	Amend	It is inappropriate to allow unfettered access where sites are in private ownership	Delete part d
Kirsty Henderson (S125)	S125.003	Sites and Areas of Significance to Māori	SASM - P15	Oppose	Permitted activities in SASM - P15 give Iwi sweeping powers to deny a permitted activity.	Remove policy and provide more regard to the Land or business owners ability to improve the land is required. Address concerns regarding costs to undertake the required assessments and unclear outcomes and timeframes for iwi

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						involvement.
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.291	Sites and Areas of Significance to Māori	SASM - P15	Support	We support this policy.	Retain policy.
Transpower New Zealand Limited (S299)	S299.026	Sites and Areas of Significance to Māori	SASM - P15	Support	Notwithstanding its sought 'seek to avoid policy" within the Energy Chapter which would apply to sites and areas of significance to Māori in Schedule Three, Transpower supports this policy which provides for activities to be undertaken where there is functional or operational need for it to occur in that location, and where the values of the site or area are protected.	Retain the policy
Te Tumu Paeroa - The office of the Māori Trustee (S440)	S440.020	Sites and Areas of Significance to Māori	SASM - P15	Support in part	The Māori Trustee supports the use of practical mechanisms to maintain and enhance the ability of Poutini Ngāi Tahu to access and use the site or area of significance for karakia, monitoring, cultural activities and ahi kā roa. However, as sites of significance to Māori are currently mapped on the E-Plan over entire property records of titles, including private land, the qualifier 'are done in agreement with affected landowners' is needed.	The Māori Trustee considers that the Te Tai o Poutini E-Plan needs to clearly identify the extent of sites of significance to Māori as they currently appear to be across entire property records of titles.  The Māori Trustee considers that the following amendment needs to be made policy SASM P15.  Amendments P15(f). Any practical mechanisms to maintain or enhance the ability of Poutini Ngāi Tahu to access and use the site or area of significance for karakia, monitoring, cultural activities and ahi kā roa <b>are made in agreement with affected landowners.</b>
TiGa Minerals and Metals Limited (S493)	S493.039	Sites and Areas of Significance to Māori	SASM - P15	Amend	To ensure provision of any activity that has a functional or operational need in these areas.	Amend: Allow <del>any other</del> use and development on sites and areas of significance to Māori in Schedule Three where it can be demonstrated that the identified values of the site or area are

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						protected and maintained, having regard to: ...
Steve Croasdale (S516)	S516.019	Sites and Areas of Significance to Māori	SASM - P15	Support		Retain
Straterra (S536)	S536.045	Sites and Areas of Significance to Māori	SASM - P15	Amend	The MINZ and its activities would get captured by the SPZ zone inclusion as well as mineral prospecting, exploration and extraction activities in the zones included within RURZ and OSRZ. We would welcome a consenting pathway and access to the effects management hierarchy, which the discretionary status would provide, thereby allowing for a case-by-case consideration of the activity and the SAMS together with the mitigation and/or protection required.	Change the activity status of this rule from Non-Complying to Discretionary.
Westpower Limited (S547)	S547.213	Sites and Areas of Significance to Māori	SASM - P15	Amend	(1) Given this policy appears to be related to all other activities not provided for in policy 13 it would be appropriate for it too include different wording regarding avoidance, remedy or mitigation of effects. This would be consistent with approaches in the rules section which seek a flexible approach to managing activities. (2) To achieve the revised wording add a new "a." and adjust existing "a.-f." references accordingly. (3) The wording of existing item b. needs to be consistent with wording elsewhere in the plan and the RPS.	(1) Amend SASM-P15, "SASM-P15 Allow any other use and development ... it can be demonstrated that the potential effects on the identified values of the site or area are <b>avoided, remedied or mitigated</b> having regard to:" (2) Add a new item a., a. <b>Avoidance in the first instance, and where this is not practicable the proposed measures to manage potential effects on the identified values.</b> (3) Adjust references for existing items "a.-f". (4) Amend existing item b., <b>"b. The technical, locational, functional and operational constraints or requirements of the proposed activity."</b>

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Chris & Jan Coll (S558)	S558.078	Sites and Areas of Significance to Māori	SASM - P15	Support		REtain
Chris J Coll Surveying Limited (S566)	S566.078	Sites and Areas of Significance to Māori	SASM - P15	Support		REtain
William McLaughlin (S567)	S567.161	Sites and Areas of Significance to Māori	SASM - P15	Support		REtain
Laura Coll McLaughlin (S574)	S574.078	Sites and Areas of Significance to Māori	SASM - P15	Support		REtain
WMS Group (HQ) Limited and WMS Land Co. Limited (S599)	S599.043	Sites and Areas of Significance to Māori	SASM - P15	Amend	To ensure this policy provides for any activity that has a functional or operational need to occur in these areas.	Amend SASM - P15 as follows: Allow <del>any other</del> use and development on sites and areas of significance to Māori in Schedule Three where it can be demonstrated that the identified values of the site or area are protected and maintained, having regard to: ...
Clair Pope (S22)	S22.001	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori Rules	Neutral	I am the property owner and purchased this land without these in place and feel I deserve clarification on this.	I would like the council to define exactly what effect being designated an area of significance to Maori my property has and an exact definition of any restrictions or what activities need resource consent.
Mark Bowe (S69)	S69.002	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori Rules	Amend		Request for clarification whether rules apply or not on properties with SASM overlay. Need guarantees that the value of the property will not be negatively influenced by this implementation. Landowners should get rewards for protecting these areas of significance.
Kirsty Henderson (S125)	S125.001	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori Rules	Oppose	Adds a huge extra layer to resource consent on land that has been used for residence and/or business in private ownership for decades. There is nothing in the document that says it will be a fair	Amend rules to ensure lwi cannot withhold reasonable consent applications on prejudicial grounds.



Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					equally-weighted decision between two parties. It gives all the power to Iwi to allow or deny a fair request for consent. We need a fair and equitable process where we can come to a mutual and reasonable outcome. [refer original submission for more information]	
Misato Nomura (S151)	S151.004	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori Rules	Support in part	As landowners of a SASM site, we would like to help protect and preserve Maori culture. There are currently several rules listed in the proposed plan that outlines the need for approval from the relevant Poutini Ngai Tahu Runanga. However, there is no clear information regarding who to approach, how to approach them, what the expected timeframes are and the associated cost for it (if any). Hence, it is difficult to plan the build in advance. Under the RMA process, councils are expected to respond within a given timeframe. Without a timeframe, there is a potential for activities to be held up and we are not aware if the relevant Poutini Ngai Tahu Runanga are well equipped to handle the surge in enquiries that they may face. A quoted article says that this is not about royalties - we would like confirmation that there is no to minimal charge for us seeking approval from iwi.	That the plan outlines the timeframes for relevant Poutini Ngai Tahu Runanga to provide approvals for SASM activities and that the approvals are given at no charge.
Helen Carter (S209)	S209.006	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori Rules	Oppose	My only other concerns were about making changes to property footprint or earthworks in SASM and changes to this needing to go through Ngai Tahu, but it looked like these weren't directly applicable to SASM44. It does, however, sound like a lot of extra paperwork which could potentially be costly (will Ngai Tahu	Not stated

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					be taking a fee for this? Will this become a money gathering activity?) and it looks time consuming.	
Bill Baxter (S210)	S210.002	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori Rules	Not Stated	Difficult to understand rules	clarify rules that apply
Bill Baxter (S210)	S210.003	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori Rules	Oppose		Opposes restrictions on planting of trees, goldmining
Katie Baxter (S211)	S211.002	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori Rules	Not Stated	The plan is not clear on what rules apply to property for SASM 104	Provide clearer rules for Sites of Significance to Māori SASM 104
Margaret Steele (S214)	S214.002	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori Rules	Not Stated	Concerned that rules aren't clear in the plan	Provide clearer rules for Sites of Significance to Māori Site 36
Madelene Gibson (S215)	S215.002	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori Rules	Amend	Concern that rules aren't clear in the plan	Clarify rules that apply to SASM 44
Allan Hinch (S219)	S219.002	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori Rules	Oppose	The process is undemocratic and their has been insufficient consultation.	Rules not to have "immediate effect".
William & Vicki Molloy (S227)	S227.002	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori Rules	Oppose	While the RMA states that because SASM are considered a type of historic heritage, rules associated with them have legal effect from the time the proposed TTPP was notified this is totally rejected by the affected private landowners, who are submitting and requesting that these rules be withdrawn from the private properties identified.	Any Rules with immediate effect be withdrawn from the currently effected private properties.
William & Vicki Molloy (S227)	S227.003	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori Rules	Oppose	These properties are identified in SASM 68 in error.	That any of the proposed references, rules, or conditions, placed on any private property fronting the state highway in relation to SASM 68 be withdrawn immediately.
Rex & Julie MacDonald (S229)	S229.002	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori Rules	Amend	It is also noted that the RMA states that because SASM are considered a type of historic heritage, rules associated with them have legal effect from the time the proposed TTPP was notified. This is	That any of the proposed references, rules, or conditions, placed on any private property fronting the state highway be withdrawn immediately.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					totally rejected by the affected private landowners, who are submitting and requesting that these rules be withdrawn from the private properties identified	
Rex & Julie MacDonald (S229)	S229.003	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori Rules	Oppose		That any rules with immediate effect be withdrawn from the currently affected private landowners
Darryn & Terri Fairhall (S230)	S230.002	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori Rules	Amend	It is also noted that the RMA states that because SASM are considered a type of historic heritage, rules associated with them have legal effect from the time the proposed TTPP was notified. This is totally rejected by the affected private landowners, who are submitting and requesting that these rules be withdrawn from the private properties identified.	That any of the proposed references, rules, or conditions, placed on any private property fronting the state highway be withdrawn immediately. Any Rules with immediate effect be withdrawn from the currently affected private properties.
Michael Elliott (S231)	S231.002	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori Rules	Amend	The RMA states that because SASM are considered a type of historic heritage, rules associated with them have legal effect from the time the proposed TTPP was notified. This is totally rejected by the affected private landowners, who are submitting and requesting that these rules be withdrawn from the private properties identified.	Any Rules with immediate effect be withdrawn from the currently effected private properties. That any of the proposed references, rules, or conditions, placed on any private property fronting the state highway be withdrawn immediately.
Pokei Lau (S232)	S232.002	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori Rules	Amend	The RMA states that because SASM are considered a type of historic heritage, rules associated with them have legal effect from the time the proposed TTPP was notified. This is totally rejected by the affected private landowners, who are submitting and requesting that these rules be withdrawn from the private properties identified.	That any of the proposed references, rules, or conditions, placed on any private property fronting the state highway be withdrawn immediately. Any Rules with immediate effect be withdrawn from the currently effected private properties.
Greg & Deedee Daly (S233)	S233.003	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori Rules	Amend	The RMA states that because SASM are considered a type of historic heritage, rules associated with them have legal effect from the time the proposed TTPP	That any of the proposed references, rules, or conditions, placed on any private property fronting the state highway be withdrawn immediately.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					was notified. This is totally rejected by the affected private landowners, who are submitting and requesting that these rules be withdrawn from the private properties identified.	
Greg & Deedee Daly (S233)	S233.004	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori Rules	Oppose		Any Rules with immediate effect be withdrawn from the currently effected private properties.
Christine & Michael Whitehead (S234)	S234.003	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori Rules	Amend	The RMA states that because SASM are considered a type of historic heritage, rules associated with them have legal effect from the time the proposed TTPP was notified. This is totally rejected by the affected private landowners, who are submitting and requesting that these rules be withdrawn from the private properties identified.	That any of the proposed references, rules, or conditions, placed on any private property fronting the state highway be withdrawn immediately. Any Rules with immediate effect be withdrawn from the currently effected private properties.
Brent and Anne Newton (S235)	S235.003	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori Rules	Amend	The RMA states that because SASM are considered a type of historic heritage, rules associated with them have legal effect from the time the proposed TTPP was notified. This is totally rejected by the affected private landowners, who are submitting and requesting that these rules be withdrawn from the private properties identified.	That any of the proposed references, rules, or conditions, placed on any private property fronting the state highway be withdrawn immediately. Any Rules with immediate effect be withdrawn from the currently effected private properties.
Karen & Bill Potter (S236)	S236.003	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori Rules	Amend	The RMA states that because SASM are considered a type of historic heritage, rules associated with them have legal effect from the time the proposed TTPP was notified. This is totally rejected by the affected private landowners, who are submitting and requesting that these rules be withdrawn from the private properties identified.	That any of the proposed references, rules, or conditions, placed on any private property fronting the state highway be withdrawn immediately. Any Rules with immediate effect be withdrawn from the currently effected private properties.
Wayne Moen (S237)	S237.003	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori Rules	Amend	The RMA states that because SASM are considered a type of historic heritage, rules associated with them have legal effect from the time the proposed TTPP	That any of the proposed references, rules, or conditions, placed on any private property fronting the state highway be withdrawn immediately.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					was notified. This is totally rejected by the affected private landowners, who are submitting and requesting that these rules be withdrawn from the private properties identified.	
Wayne Moen (S237)	S237.004	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori Rules	Oppose		Any Rules with immediate effect be withdrawn from the currently effected private properties.
Veronica Jacobs (S238)	S238.003	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori Rules	Amend	The RMA states that because SASM are considered a type of historic heritage, rules associated with them have legal effect from the time the proposed TTPP was notified. This is totally rejected by the affected private landowners, who are submitting and requesting that these rules be withdrawn from the private properties identified.	That any of the proposed references, rules, or conditions, placed on any private property fronting the state highway be withdrawn immediately. Any Rules with immediate effect be withdrawn from the currently effected private properties.
Mark Jones (S239)	S239.003	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori Rules	Amend	The RMA states that because SASM are considered a type of historic heritage, rules associated with them have legal effect from the time the proposed TTPP was notified. This is totally rejected by the affected private landowners, who are submitting and requesting that these rules be withdrawn from the private properties identified.	That any of the proposed references, rules, or conditions, placed on any private property fronting the state highway be withdrawn immediately. Any Rules with immediate effect be withdrawn from the currently effected private properties.
Colleen Monachan (S242)	S242.003	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori Rules	Amend	The RMA states that because SASM are considered a type of historic heritage, rules associated with them have legal effect from the time the proposed TTPP was notified. This is totally rejected by the affected private landowners, who are submitting and requesting that these rules be withdrawn from the private properties identified.	That any of the proposed references, rules, or conditions, placed on any private property fronting the state highway be withdrawn immediately. Any Rules with immediate effect be withdrawn from the currently effected private properties.
Rodney & Wendy Henham (S243)	S243.003	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori Rules	Amend	The RMA states that because SASM are considered a type of historic heritage, rules associated with them have legal effect from the time the proposed TTPP	Any Rules with immediate effect be withdrawn from the currently effected private properties.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					was notified. This is totally rejected by the affected private landowners, who are submitting and requesting that these rules be withdrawn from the private properties identified.	
Rodney & Wendy Henham (S243)	S243.004	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori Rules	Support		That any of the proposed references, rules, or conditions, placed on any private property fronting the state highway be withdrawn immediately.
Murray & Marian Molloy (S244)	S244.003	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori Rules	Amend	The RMA states that because SASM are considered a type of historic heritage, rules associated with them have legal effect from the time the proposed TTPP was notified. This is totally rejected by the affected private landowners, who are submitting and requesting that these rules be withdrawn from the private properties identified.	That any of the proposed references, rules, or conditions, placed on any private property fronting the state highway be withdrawn immediately. Any Rules with immediate effect be withdrawn from the currently effected private properties.
David & Debra Kokshoorn (S245)	S245.003	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori Rules	Amend	The RMA states that because SASM are considered a type of historic heritage, rules associated with them have legal effect from the time the proposed TTPP was notified. This is totally rejected by the affected private landowners, who are submitting and requesting that these rules be withdrawn from the private properties identified.	That any of the proposed references, rules, or conditions, placed on any private property fronting the state highway be withdrawn immediately. Any Rules with immediate effect be withdrawn from the currently effected private properties.
Macty Francis Vithayathil (S246)	S246.003	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori Rules	Amend	The RMA states that because SASM are considered a type of historic heritage, rules associated with them have legal effect from the time the proposed TTPP was notified. This is totally rejected by the affected private landowners, who are submitting and requesting that these rules be withdrawn from the private properties identified.	That any of the proposed references, rules, or conditions, placed on any private property fronting the state highway be withdrawn immediately. Any Rules with immediate effect be withdrawn from the currently effected private properties.
John Edington (S264)	S264.003	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori Rules	Amend	The RMA states that because SASM are considered a type of historic heritage, rules associated with them have legal	That any of the proposed references, rules, or conditions, placed on any private property fronting the state highway be withdrawn

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					effect from the time the proposed TTPP was notified. This is totally rejected by the affected private landowners, who are submitting and requesting that these rules be withdrawn from the private properties identified.	immediately. Any Rules with immediate effect be withdrawn from the currently effected private properties.
P. Faith Quinn (S266)	S266.003	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori Rules	Amend	The RMA states that because SASM are considered a type of historic heritage, rules associated with them have legal effect from the time the proposed TTPP was notified. This is totally rejected by the affected private landowners, who are submitting and requesting that these rules be withdrawn from the private properties identified.	That any of the proposed references, rules, or conditions, placed on any private property fronting the state highway be withdrawn immediately.
P. Faith Quinn (S266)	S266.004	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori Rules	Oppose		Any Rules with immediate effect be withdrawn from the currently effected private properties.
Stephen Page (S270)	S270.014	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori Rules	Oppose	The above SASM rules are stated within the proposed TTPP to have 'legal effect'. This apparent claim is made under the authority of the Resource Management Act (RMA). The private property owners whose land falls within one of the 216 SASMs covered by these rules, have been given no opportunity to 'Participate' in their formulation, nor been offered any 'Protection' of their ownership rights and this is considered to breach all 3 principles of the Treaty of Waitangi.	Do not have rule have legal effect.
Dale Stephen (S277)	S277.001	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori Rules	Oppose	Applications of Areas of significance to Maori, not only take away land use options but devalue land. The letter states, "The relevant rules that apply are identified in the Proposed Te Tai o Poutini Plan by a red 'gavel 'icon". To add further frustration the letter states	Provide a letter of apology to all ratepayers that received the SASM letter and factual evidence of what is being stated.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					that the rules have already come into "immediate legal effect".	
Pete McDonnell (S281)	S281.001	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori Rules	Amend	<p>We accept that areas significant to Maori are included in the TTPP - history contributes to the fabric of the West Coast as we know it today. However history should not, on its own, be an encumbrance on individual property owners' rights.</p> <p>Our property has been included in SASM 104 Kawhaka Catchment. It covers a random area of our property (to us - we can walk in a straight line from our house to the Fox Creek boundary, a distance of approx. 800m and be in, out, back in and out again of the SASM). It has no rules associated with it. In the 15 years we have owned this property no representative of Ngai Tahu or local iwi have ever approached us regarding the significance of the area to them. We bought our property as unencumbered, freehold land. It had been significantly developed and modified prior to us owning it and to my knowledge no historical artefacts or any thing of significance has been found.</p> <p>Therefore nothing needs to be recorded against our property, all existing property rights should remain and no rights divested to any other group or individual.</p>	That SASMs with no rules applicable are <b>not</b> required to be recorded on District Council individual property LIM reports and that <b>no</b> additional or subsequent rules can be applied to SASMs.
Leanne McDonnell (S282)	S282.001	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori Rules	Amend	<p>We accept that areas significant to Maori are included in the TTPP - history contributes to the fabric of the West Coast as we know it today. However history should not, on its own, be an encumbrance on individual property owners' rights.</p> <p>Our property has been included in SASM</p>	That SASMs with no rules applicable are <b>not</b> required to be recorded on District Council individual property LIM reports and that <b>no</b> additional or subsequent rules can be applied to SASMs.



Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					104 Kawhaka Catchment. It has no rules associated with it. In the 15 years we have owned this property no representative of Ngai Tahu or local iwi have ever approached us regarding the significance of the area to them. We bought our property as unencumbered, freehold land. It had been significantly developed and modified prior to us owning it and to our knowledge no historical artefacts or any thing of significance has been found. Therefore nothing needs to be recorded against our property, all existing property rights should remain and no rights divested to any other group or individual.	
Kawhaka Creek Catchment Residence (S297)	S297.017	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori Rules	Oppose	Schedule Three is blank, so we can assume with confidence that this is not going to change and will remain blank? without further encumbrements being placed on our property?	Provide assurance that no further rules in relation to SASM 104 will apply to the property.
Nyoli Waghorn-Rogatski (S301)	S301.001	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori Rules	Amend	Concerned that rules are not clear with the plan.	SASM 36. Would like more information as how the SASM will affect my enjoyment at the property both now and in the future.
Erin Stagg (S314)	S314.004	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori Rules	Amend	So that consenting can be meaningful, consistent and efficient.	Seek a set of consultation processes between Iwi and Council around SASM.
Jennifer Lake (S323)	S323.003	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori Rules	Support in part	to the extent relevant, I would seek clarification as to whether current statutory provisions, for example, in the Historic Places Act or the Heritage New Zealand Pourere Taonga Act provide adequate protection without the potentially additional burden of an administrative and consent process, which would need to be initiated by private landowners.	Review provisions to determine whether current statutory provisions provide adequate protection for SASM 19 and 22 without the need to additionally schedule in the TTPP

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Leanne Hart (S326)	S326.002	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori Rules	Amend		Request to clarify the rules and how the property will be affected in the future.
Susan Fraser (S331)	S331.001	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori Rules	Amend		Request to clarify the rules.
Robert Fraser (S333)	S333.001	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori Rules	Amend		Request to clarify the rules.
Charlotte Bradley-Peni (S370)	S370.002	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori Rules	Amend		Request for clarification about rules affecting land that is protected by a Victorian Title.
Lillian Crozier (S386)	S386.002	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori Rules	Oppose	While the RMA states that because SASM are considered a type of historic heritage, rules associated with them have legal effect from the time the proposed TTPP was notified, this is totally rejected by the affected private landowners, who are submitting and requesting that these rules be withdrawn from the private properties identified.	Any Rules with immediate effect be withdrawn from the currently effected private properties
Garry Gaasbeek (S398)	S398.002	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori Rules	Oppose		Oppose the SASM rules on freehold land.
Jane Whyte & Jeff Page (S467)	S467.031	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori Rules	Support	Two cultural overlays apply to Punakaiki Village, but no regulation results. This approach is supported.	Retain non-regulatory approach to SASM31 and Pounamu Management Area as it relates to Punakaiki Village
Moreporks Lakeside Lodge LTD (S470)	S470.003	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori Rules	Support in part	Support in so far as they do not regulate activities at SASM 79	Retain the approach of having no specific rules for activities at SASM 79.
Rocky Mining Limited (S474)	S474.010	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori Rules	Support	RML support the notification to Poutini Ngāi Tahu of applications in those areas.	Retain notification provisions to Poutini Ngāi Tahu in these rules.
West Coast Regional Council (S488)	S488.014	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori Rules	Amend		Sites and Areas of Significance to Māori rules are refined in consultation with landowners.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Leonie Avery (S507)	S507.080	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori Rules	Oppose	We oppose SASM14 and the rules associated with it.	Delete SASM14 or provide exclusions for it in associated rules.
Jared Avery (S508)	S508.080	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori Rules	Oppose	We oppose SASM14 and the rules associated with it.	Delete SASM14 or provide exclusions for it in associated rules.
Kyle Avery (S509)	S509.080	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori Rules	Oppose	We oppose SASM14 and the rules associated with it.	Delete SASM14 or provide exclusions for it in associated rules.
Avery Bros (S510)	S510.080	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori Rules	Oppose	We oppose SASM14 and the rules associated with it.	Delete SASM14 or provide exclusions for it in associated rules.
Bradshaw Farms (S511)	S511.080	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori Rules	Oppose	We oppose SASM14 and the rules associated with it.	Delete SASM14 or provide exclusions for it in associated rules.
Paul Avery (S512)	S512.080	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori Rules	Oppose	We oppose SASM14 and the rules associated with it.	Delete SASM14 or provide exclusions for it in associated rules.
Brett Avery (S513)	S513.080	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori Rules	Oppose	We oppose SASM14 and the rules associated with it.	Delete SASM14 or provide exclusions for it in associated rules.
MIKE GREER FAMILY TRUST AND DANIEL CHIMA TRUST (S530)	S530.002	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori Rules	Support	Further, the absence of any SASM rules applicable to SASM 79 suggests that land on or beyond the foreshore is not intended to be included in the SASM 79 overlay shown on planning maps.	Retain the provisions whereby no specific rules apply to SASM 79
TE KINGA/IVEAGH BAY RESIDENTS & RATEPAYERS ASSOCIATION (S531)	S531.002	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori Rules	Support	Further, the absence of any SASM rules applicable to SASM 79 suggests that land on or beyond the foreshore is not intended to be included in the SASM 79 overlay shown on planning maps.	Retain the provisions whereby no specific rules apply to SASM 79
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.189	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori Rules	Support in part	The advice note refers to "identified rules" where consent will be required. It is not clear where or how these rules are "identified"	Amend to include a section setting out which other chapters of the Plan apply, in line with Key Issue above.
Groundswell NZ (S562)	S562.002	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori Rules	Oppose	In taking this action the committee (and councils) have negatively impacted the values they were trying to protect and	That the immediate legal effect applying to new zones such as SASMs be withdrawn.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					undermined councils' relationships with their constituents.	
David Ellerm (S581)	S581.022	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori Rules	Amend	Infrastructure offending the mauri of Lake Brunner SASM 79	Add: a new prohibited activity <b>No further expansion of the GDC sewage collection tanks at Cashmere Bay. Requirement to relocate the GDC sewage collection tanks to an acceptable location.</b>
Stephen Page (S270)	S270.015	Sites and Areas of Significance to Māori	Permitted Activities	Oppose	Of the 216 SASM's identified in Schedule Three, I have counted at least 88 that fall under one of the 4 designated categories highlighted above. The property owners of any one of these SASM's will be required to obtain written approval from Poutini Ngai Tahu and the confirmation of this approval must then be submitted to the council at least 10 days prior to the activity commencing. I am also concerned that the process for obtaining these written approvals will come at a cost to landowners who might be charged by Poutini Ngai Tahu for the administrative costs involved? Is the committee able to state categorically that all potential costs under this scheme will be covered by the council's existing budget?	Clarify how written approvals for these rules will be administered and whether these costs will be covered by the Council.
West Coast Fish and Game Council (S302)	S302.007	Sites and Areas of Significance to Māori	Permitted Activities	Amend	Some of the scheduled sites and areas of significance to Poutini Ngāi Tahu are public lands which provide valued conservation and public recreation opportunities (including sports fishing and game bird hunting opportunities, e.g. Kōtukuwhakaoko /Lake Brunner, or Ōkarito Lagoon). The pTTPP should not limit or restrict such lawful public activities and should provide for them. For sites and areas which are not open to public access, conservation or recreational activities can not lawfully	Add a new permitted activity rule - <b>Lawful Conservation or Recreation Activities.</b>

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					occur without appropriate land owner approval.	
Martin & Co Westport Ltd and Lumberland Building Market Westport (S543)	S543.025	Sites and Areas of Significance to Māori	Permitted Activities	Support	We support that there are no relevant permitted activity rules relating to SASM 12	Retain as notified
Westpower Limited (S547)	S547.215	Sites and Areas of Significance to Māori	Permitted Activities	Amend	The permitted rules do not appropriately provide for the functions of Westpower.	Amend to provide a single permitted activity rule for all aspects of energy activities undertaken by Westpower.
Westpower Limited (S547)	S547.216	Sites and Areas of Significance to Māori	Permitted Activities	Amend	The requirement that all new energy activities undertaken by Westpower require consent.	Where compliance is not achieved then an appropriate consent activity status can be developed as part of the process.
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.115	Sites and Areas of Significance to Māori	Permitted Activities	Amend	Seek that a table is inserted into each rule which contains all of the particular SASMs that are relevant to that rule and that the use of the numbered categories tahi, rua, toru and wha is consequently removed from the rules and from Schedule 3.	Amend to create a separate table for each rule and is embed within the relevant rule.
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.395	Sites and Areas of Significance to Māori	Permitted Activities	Amend	since we are requesting tables which sit within each rule and hence reference to Schedule Three in these rule headings is no longer required.	Remove the first reference to the words 'Sites and Areas in Schedule Three - ' ; from the rule headings for Rules SASM-R1, SASM-R2, SASM-R3, SASM-R4, SASM-R5, SASM-R6
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.292	Sites and Areas of Significance to Māori	SASM -R1	Support	We support this rule.	Retain rule.
Federated Farmers of New Zealand (S524)	S524.052	Sites and Areas of Significance to Māori	SASM -R1	Support	Recognises that grazing of animals is an appropriate activity within most sites of significance to Māori.	Retain as notified.
Buller District Council (S538)	S538.178	Sites and Areas of Significance to Māori	SASM -R1	Support	Rule 1 is supported.	Retain as notified.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Chris & Jan Coll (S558)	S558.079	Sites and Areas of Significance to Māori	SASM -R1	Support		Retain
Chris J Coll Surveying Limited (S566)	S566.079	Sites and Areas of Significance to Māori	SASM -R1	Support		Retain
William McLaughlin (S567)	S567.162	Sites and Areas of Significance to Māori	SASM -R1	Support		Retain
Laura Coll McLaughlin (S574)	S574.079	Sites and Areas of Significance to Māori	SASM -R1	Support		Retain
Grey District Council (S608)	S608.023	Sites and Areas of Significance to Māori	SASM -R1	Amend	Subsequent amendment for review of SASMs this Rule may require a re-write	Remove Rule
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.116	Sites and Areas of Significance to Māori	SASM -R1	Amend	Seek the removal of SASM22 Okari Lagoon from this rule given this site is a waterway and cannot be grazed.	Amend activity standard 1 of SASM-R1 as follows: 1. Where the activity is not on the following Sites and Areas of Significance to Māori as identified in <b>Table SASM-R1 below</b> : a. <del>SASM 22 Okari Lagoon; SASM 41 Kotorepi (Nine Mile); SASM 55 Māwhera Burial Cave Site; SASM 81 Takataka Islands; SASM 84 Knoll Point; SASM 127 Ulipa; SASM 133 No. 19 Okārito Native Reserve; SASM 135 Okārito (No. 18 Kaomaru Native Reserve); SASM 168 No. 4 Heretaniwha Native Reserve; or SASM 207 Awawhata Reserve at River Mouth. Insert <b>Table SASM-R1</b></del>
Kirsty Henderson (S125)	S125.009	Sites and Areas of Significance to Māori	SASM -R2	Oppose in part	Removal of the need to seek consent for minor works such as erecting a new fence. In the proposed plan, landowners are only allowed to maintain existing fences, along an existing alignment. This puts additional time and costs for a minor job. Many very minor works will now require consent, this is unreasonable to landowners	Amend rule so that consent is not required for insignificant work such as a new fences etc

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Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.293	Sites and Areas of Significance to Māori	SASM -R2	Support	We support this rule.	Retain rule.
Manawa Energy Limited (Manawa Energy) (S438)	S438.071	Sites and Areas of Significance to Māori	SASM -R2	Support in part	Manawa seeks that provision is made for earthworks associated with the maintenance or repair of existing regionally significant infrastructure as a permitted activity in specified SASM areas.	Amend SASM- R2 by adding a new clause as follows: 1. These are earthworks associated with: i. Burials at urupā; or ... iv. Maintaining roads/tracks within the footprint or modified ground compromised by the existing road/track; <del>and</del> <b>or v. for the maintenance or repair of existing regionally significant infrastructure; and</b>
Leonie Avery (S507)	S507.022	Sites and Areas of Significance to Māori	SASM -R2	Oppose in part	Too restrictive.	Delete iii. a. and b.
Jared Avery (S508)	S508.022	Sites and Areas of Significance to Māori	SASM -R2	Oppose in part	Too restrictive.	Delete iii. a. and b.
Kyle Avery (S509)	S509.022	Sites and Areas of Significance to Māori	SASM -R2	Oppose in part	Too restrictive.	Delete iii. a. and b.
Avery Bros (S510)	S510.022	Sites and Areas of Significance to Māori	SASM -R2	Oppose in part	Too restrictive.	Delete iii. a. and b.
Bradshaw Farms (S511)	S511.022	Sites and Areas of Significance to Māori	SASM -R2	Oppose in part	Too restrictive.	Delete iii. a. and b.
Paul Avery (S512)	S512.022	Sites and Areas of Significance to Māori	SASM -R2	Oppose in part	Too restrictive.	Delete iii. a. and b.
Brett Avery (S513)	S513.022	Sites and Areas of Significance to Māori	SASM -R2	Oppose in part	Too restrictive.	Delete iii. a. and b.
Steve Croasdale (S516)	S516.020	Sites and Areas of Significance to Māori	SASM -R2	Support		Retain

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Federated Farmers of New Zealand (S524)	S524.053	Sites and Areas of Significance to Māori	SASM -R2	Support in part	This rule could be clearer if the fence posts and replacement of poles for network utility lines were separated.	Reword as follows: iii. Installing fence posts provided that a. The area of land disturbed is limited to what is necessary to maintain an existing fence or line along its existing alignment; iv. the replacement of poles for overhead network utility lines provided that a. The activity does not involve installation or digging of new holes for overhead network utility lines; or ... List sites in 2 i) as a list as in SASM-R4
Buller District Council (S538)	S538.179	Sites and Areas of Significance to Māori	SASM -R2	Support in part	Council has an over-arching concern with permitted activity Rules 2 - 6. The permitted activities managed by these rules are qualified by the need to provide written approval from the relevant Poutini Ngāi Tahu Rūnanga to the relevant District Council for activities affecting specific scheduled sites/areas. This will obviously entail consultation with Rūnanga and there will need to be a clear pathway for applicants to obtain written approval. While Council is supportive of iwi engagement, it is concerned that the existing resource capability of Rūnanga may pose a significant hurdle and result in limited notification as the default process, thereby having the perverse outcome of reduced engagement over cultural matters.	Council seeks assurances that there will be a written approval pathway for applicants and that Rūnanga have the capacity to deal with requests in a timely manner.
Westpower Limited (S547)	S547.217	Sites and Areas of Significance to Māori	SASM -R2	Oppose in part	Whilst the intent to provide for some existing electricity infrastructure is supported the matters provided for will impact Westpower's ability to service the community through the existing network.	As above Westpower's preference is that one rule is developed to provide for its energy activities, including energy aspects of infrastructure and critical infrastructure. Whilst not the preferred approach; (1) Amend item 1.(iii), "iii. Installing fence posts ... for overhead



Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					<p>(1) Reference should include energy activities for consistency, given the separation of activities in the plan.</p> <p>(2) The replacement of poles for overhead lines (item iii) does not appropriately provide for that activity as commonly a new pole is required and may not be in the same hole as existing. It is noted that there is no similar provision for fences and therefore the matter should be the same as for item (iii.a.).</p> <p>(3) There is no ability to maintain underground lines and cables. This should be provided for given prior disturbance has occurred.</p> <p>(4) There is no ability to undertaken earthworks to maintain existing substations. This should be provided for given prior disturbance has occurred.</p>	<p><b>energy activity</b> and network utility lines provided that:".</p> <p>(2) Delete item b. From iii.</p> <p>(3) Insert new iv., "<b>iv) maintaining existing underground lines and cables provided that: a. The area of land disturbed is limited to what is necessary to maintain the lines or cables; or</b>".</p> <p>(4) Insert new v., "<b>v) maintaining existing substations provided that: a. The area of land disturbed is limited to what is necessary to maintain the substation; or</b>".</p> <p>(5) Amend existing item 1.iv. to <b>1.vi</b>.</p>
Grey District Council (S608)	S608.024	Sites and Areas of Significance to Māori	SASM -R2	Oppose in part	Subsequent amendment for review of SASMs this Rule may require a re-write	Remove Rule
Grey District Council (S608)	S608.626	Sites and Areas of Significance to Māori	SASM -R2	Support in part	<p>This rule is generally supported as it provides for:</p> <ul style="list-style-type: none"> <li>- earthworks that are for the maintenance of roads/track within the footprint or modified ground compromised by the existing road/track</li> </ul>	<p>Clarify what footprint refers to in relation to this rule, ie - within the boundaries of the road parcel</p> <p>Expand rule to include timeframe for response to request to be supplied.</p> <p>For consistency and clarity include an</p>

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					<p>R2-2 requires that written approval is obtained from the relevant Poutini Ngai Tahu Runanga, this requirement is supported. It is suggested that the rule includes scope on timeframes for a response to the request for written approval to be supplied</p> <p>R3 - requires an ADP commitment with a form submitted to Council. Where is this form? Will any ADP be accepted or does it need a site specific form each time</p>	acceptedADP at Appendix Four that can be included in applications and decisions.
Avery Brothers (S609)	S609.021	Sites and Areas of Significance to Māori	SASM -R2	Amend	Too restrictive.	Delete iii. a. and b.
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.117	Sites and Areas of Significance to Māori	SASM -R2	Amend	Seek the removal of SASM17 Kawatiri South Bank Native Reserve from this rule as we consider that minor earthworks can occur on this site	<p>Amend activity standard 2 of SASM-R2 to read as follows:</p> <p>2. In relation to standards ii., iii. and iv. these earthworks are not undertaken at the following Sites and Areas of Significance to Māori identified in <b>Table SASM -R2 below Schedule Three</b> except with the written approval from the relevant Poutini Ngāi Tahu rūnanga which is provided to the relevant District Council at least 10 working days prior to the activity commencing: i- <del>SASM 17 Kawatiri South Bank Native Reserve;</del> <del>SASM 41 Kotoropi (Nine Mile); SASM 54 Motutapu; SASM 55 Māwhera Burial Cave Site; SASM 81 Takataka Islands; SASM 84 Knoll Point; SASM 110 Māhinapua; SASM 127 Ulipa; SASM 130 Whataroa Native Reserves Secs 21; SASM 133 No. 19 Ōkārito Native Reserve; SASM 135 Ōkārito (No. 18 Kaomaru Native Reserve); SASM 155 Hunts Beach Māori Reserve; SASM 157 No. 10 Makāwhio Native Reserve; SASM 162 Horotaniwha; SASM 165 No 7</del></p> <p>Insert Table SASM-R2</p>

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Kirsty Henderson (S125)	S125.010	Sites and Areas of Significance to Māori	SASM -R3	Oppose in part	This clause is too restrictive, most alterations, even minor would require some earth disturbance or foot print alteration. Adds time/cost to work on private property.	Remove the restrictions associated with the rule that an activity is only permitted where land disturbance is not involved and change to size, structure or location.
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.294	Sites and Areas of Significance to Māori	SASM -R3	Support	We support this rule.	Retain rule.
Leonie Avery (S507)	S507.023	Sites and Areas of Significance to Māori	SASM -R3	Support	We support the rule with SASM14 being excluded.	Retain as notified with SASM14 being excluded from point 2.
Jared Avery (S508)	S508.023	Sites and Areas of Significance to Māori	SASM -R3	Support	We support the rule with SASM14 being excluded.	Retain as notified with SASM14 being excluded from point 2.
Kyle Avery (S509)	S509.023	Sites and Areas of Significance to Māori	SASM -R3	Support	We support the rule with SASM14 being excluded.	Retain as notified with SASM14 being excluded from point 2.
Avery Bros (S510)	S510.023	Sites and Areas of Significance to Māori	SASM -R3	Support	We support the rule with SASM14 being excluded.	Retain as notified with SASM14 being excluded from point 2.
Bradshaw Farms (S511)	S511.023	Sites and Areas of Significance to Māori	SASM -R3	Support	We support the rule with SASM14 being excluded.	Retain as notified with SASM14 being excluded from point 2.
Paul Avery (S512)	S512.023	Sites and Areas of Significance to Māori	SASM -R3	Support	We support the rule with SASM14 being excluded.	Retain as notified with SASM14 being excluded from point 2.
Brett Avery (S513)	S513.023	Sites and Areas of Significance to Māori	SASM -R3	Support	We support the rule with SASM14 being excluded.	Retain as notified with SASM14 being excluded from point 2.
Steve Croasdale (S516)	S516.021	Sites and Areas of Significance to Māori	SASM -R3	Support		Retain
Federated Farmers of New Zealand (S524)	S524.054	Sites and Areas of Significance to Māori	SASM -R3	Support	Recognises that these activities are appropriate	Retain as notified.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Buller District Council (S538)	S538.180	Sites and Areas of Significance to Māori	SASM -R3	Support in part	Council has an over-arching concern with permitted activity Rules 2 - 6. The permitted activities managed by these rules are qualified by the need to provide written approval from the relevant Poutini Ngāi Tahu Rūnanga to the relevant District Council for activities affecting specific scheduled sites/areas. This will obviously entail consultation with Rūnanga and there will need to be a clear pathway for applicants to obtain written approval. While Council is supportive of iwi engagement, it is concerned that the existing resource capability of Rūnanga may pose a significant hurdle and result in limited notification as the default process, thereby having the perverse outcome of reduced engagement over cultural matters.	Council seeks assurances that there will be a written approval pathway for applicants and that Rūnanga have the capacity to deal with requests in a timely manner.
Westpower Limited (S547)	S547.222	Sites and Areas of Significance to Māori	SASM -R3	Amend	This should be clarified to apply to buildings.	Amend the heading of SASM-R3 Demolition, ... to <b>a building</b> or structure on ...".
Westpower Limited (S547)	S547.223	Sites and Areas of Significance to Māori	SASM -R3	Oppose	It is unclear whether SASM-R3 is intended to refer to buildings.	Delete and develop one rule to provide for all energy activities.
Westpower Limited (S547)	S547.224	Sites and Areas of Significance to Māori	SASM -R3	Amend	It is unclear why items ii. and iii. are required where approval is obtained under item i.	Delete items ii. and iii.
Grey District Council (S608)	S608.025	Sites and Areas of Significance to Māori	SASM -R3	Amend	Subsequent amendment for review of SASMs this Rule may require a re-write	Remove Rule
Avery Brothers (S609)	S609.022	Sites and Areas of Significance to Māori	SASM -R3	Amend	We support the rule with SASM14 being excluded.	Retain as notified with SASM14 being excluded from point 2.
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae,	S620.118	Sites and Areas of Significance to Māori	SASM -R3	Amend	See reason above for SASM permitted activity rules re: categories.	1. In relation to the Sites and Areas of Significance to Māori identified in <b>Table SASM-R3 below Schedule Three</b> identified in 2. below : ....2. SASM41 ... SASM170 Porangirangi to

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Te Runanga o Makaawhio (S620)						<del>Mahitahi</del> -Insert Table SASM-R3
Toni Chittock (S61)	S61.001	Sites and Areas of Significance to Māori	SASM -R4	Oppose	<p>{SASM 197 Okuru; SASM - R4 Indigenous vegetation clearance} This rule should not be valid on the parcels of freehold land affected. Major effects on Haast farming community, affects the mental health and well-being of the community.</p> <p>Oppose the immediate legal effect, should be changed to 'not effective' on freehold land and only affect Crown Leasehold or Maori land.</p>	Remove SASM - R4 provisions as apply to SASM 197 on private land. Rule should be "not effective" on freehold land
Rodney Wright (S62)	S62.001	Sites and Areas of Significance to Māori	SASM -R4	Oppose	<p>{SASM 197 Okuru; SASM - R4 Indigenous vegetation clearance}</p> <p>This rule should not be valid on the parcels of freehold land affected. Major effects on Haast farming community, affects the mental health and well-being of the community.</p> <p>Oppose the immediate legal effect, should be changed to 'not effective' on freehold land and only affect Crown Leasehold or Maori land.</p>	Amend the rule so only applies to Crown Leasehold or Māori Land and not freehold land.
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.295	Sites and Areas of Significance to Māori	SASM -R4	Support	We support this rule.	Retain rule.
Hapuka Landing Limited (S514)	S514.007	Sites and Areas of Significance to Māori	SASM -R4	Amend	Small scale clearance of indigenous vegetation on privately owned residential properties (including the jointly owned balance lot and accessway), is unlikely to interfere with any of the values listed for SASM197 (being Kāinga, Nohoanga, Urupā and Mahinga kai).	Amendment to SASM-R4 to permit indigenous vegetation clearance of a specific area (indicatively, 100m2), and/or indigenous vegetation clearance associated with ongoing residential use/maintenance; or, in the alternative, exclude SAMS197 from the

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						application of this rule.
Steve Croasdale (S516)	S516.022	Sites and Areas of Significance to Māori	SASM -R4	Support		Retain
Federated Farmers of New Zealand (S524)	S524.135	Sites and Areas of Significance to Māori	SASM -R4	Support	Recognises that these activities are appropriate	Retain as notified.
Buller District Council (S538)	S538.181	Sites and Areas of Significance to Māori	SASM -R4	Support in part	Council has an over-arching concern with permitted activity Rules 2 - 6. The permitted activities managed by these rules are qualified by the need to provide written approval from the relevant Poutini Ngāi Tahu Rūnanga to the relevant District Council for activities affecting specific scheduled sites/areas. This will obviously entail consultation with Rūnanga and there will need to be a clear pathway for applicants to obtain written approval. While Council is supportive of iwi engagement, it is concerned that the existing resource capability of Rūnanga may pose a significant hurdle and result in limited notification as the default process, thereby having the perverse outcome of reduced engagement over cultural matters.	Council seeks assurances that there will be a written approval pathway for applicants and that Rūnanga have the capacity to deal with requests in a timely manner.
Westpower Limited (S547)	S547.225	Sites and Areas of Significance to Māori	SASM -R4	Oppose	Indigenous vegetation clearance should be permitted for maintenance of existing corridors for energy lines and cables, both above and below ground.	As above Westpower's preference is that one rule is developed to provide for energy activities, including energy aspects of infrastructure and critical infrastructure. Whilst not the preferred approach; (1) Amend Activity Status Standards, " <b>Activity Status Permitted Where:1. The clearance is to maintain existing corridors and access for above and below ground electricity lines and cables to industry standards, or to maintain and operate existing buildings and</b>

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<b>structures associated with energy activities ; or".</b> (2) Amend current 1. to <b>2.</b>
Grey District Council (S608)	S608.026	Sites and Areas of Significance to Māori	SASM -R4	Amend	Subsequent amendment for review of SASMs this Rule may require a re-write	Remove Rule
Avery Brothers (S609)	S609.023	Sites and Areas of Significance to Māori	SASM -R4	Oppose	Too restrictive	SASM14 should be excluded from Schedule Three referred to in 1.i. The rule is generally too restrictive.
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.119	Sites and Areas of Significance to Māori	SASM -R4	Amend	Consider indigenous vegetation	1. The activity does not occur on the following Sites and Areas of Significance to Māori identified in Table SASM-R4 below <del>Schedule Three</del> , except with the written approval from the relevant Poutini Ngāi Tahu rūnanga which is provided to the relevant District Council at least 10 ... Insert Table SASM - R4 with the exception of <del>SASM 8 Mokihinui Native Reserve, SASM 22 Ōkari Lagoon, SASM 47 Māwhoranui Native Reserve, SASM 102 No.24 Hokitika Native Reserve and SASM197 Ōkuru</del>
Jet Boating New Zealand (S161)	S161.009	Sites and Areas of Significance to Māori	SASM -R5	Amend	JBNZ supports the Rule. If an organised recreational jet boating event coincides with a scheduled site or area of significance to Māori, it is necessary to liaise with the relevant Runanga and obtain their written approval within 10 working days of the same. That said, the expectation is that written approvals shall not be unreasonably withheld.	Retain the Rule as proposed, however add that written approvals shall not be unreasonably withheld.
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.296	Sites and Areas of Significance to Māori	SASM -R5	Support	We support this rule.	Retain rule.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Kawhaka Creek Catchment Residence (S297)	S297.016	Sites and Areas of Significance to Māori	SASM -R5	Not Stated	Activities - Rule - SASM - R5 this is noted blank, what does this mean for us as property holders.	Clarify what rules apply to landowners in SASM 104
Gerrit and Suzie Wolters (S308)	S308.017	Sites and Areas of Significance to Māori	SASM -R5	Not Stated	Activities - Rule SASM - R5 this is noted as blank, what does this mean for us as property holders.	Provide clarity as to what rules apply to different SASM
Lake Mahinapua Aquatic Club Inc (S332)	S332.003	Sites and Areas of Significance to Māori	SASM -R5	Oppose in part	<p>The Lake Mahinapua Aquatic Club Inc has been conducting sailing activities on the surface of Lake Mahinapua since 1943, under a published Annual Programme of events. During the October to April season these events occur on a weekly basis.</p> <p>We submit that requiring weekly approval would be an unnecessary burden on both the club and the approving authority.</p>	Include recognition of the Lake Mahinapua Aquatic Club Inc. Annual Programme as a single temporary event in terms of the approval required under this provision.
Te Tumu Paeroa - The office of the Māori Trustee (S440)	S440.021	Sites and Areas of Significance to Māori	SASM -R5	Support in part	<p>The Māori Trustee is generally comfortable with the rules in the 'Sites and Areas of significance to Māori' chapter.</p> <p>However, the Māori Trustee considers that the Te Tai o Poutini E-Plan needs to clearly identify the extent of sites of significance to Māori as they currently appear to be across entire property titles. This makes identifying what activities are permitted and what activities require consent ambiguous. It is suggested that the application of rules under this chapter be reviewed and an appropriate remedy be implemented until the extent of such sites are mapped.</p> <p>The Māori Trustee administers whenua Māori on behalf of Māori landowners in Te Tai o Poutini and notes that it is likely</p>	<p>The Māori Trustee suggests that the application of rules under this chapter be reviewed and an appropriate remedy be implemented until the extent of sites of significance to Māori are mapped in the E-Plan.</p> <p>The Māori Trustee considers that the following amendment needs to be made policy SASM R5(1).</p> <p>Amendments R5(1) These are Poutini Ngāi Tahu <b>or Māori landowner</b> cultural events in accordance with tikanga; or</p>



Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					that not all Māori landowners are registered members of Poutini Ngāi Tahu. The Māori Trustee therefore considers that the tikanga of Māori landowners needs to be acknowledged alongside the tikanga of Poutini Ngāi Tahu members in this rule R5(1). This will ensure that all Māori landowners are able to hold temporary events on sites and areas in Schedule Three that are on their whenua.	
Steve Croasdale (S516)	S516.023	Sites and Areas of Significance to Māori	SASM -R5	Support		Retain
Federated Farmers of New Zealand (S524)	S524.136	Sites and Areas of Significance to Māori	SASM -R5	Support	Recognises that these activities are appropriate	Retain as notified.
Buller District Council (S538)	S538.182	Sites and Areas of Significance to Māori	SASM -R5	Support in part	Council has an over-arching concern with permitted activity Rules 2 - 6. The permitted activities managed by these rules are qualified by the need to provide written approval from the relevant Poutini Ngāi Tahu Rūnanga to the relevant District Council for activities affecting specific scheduled sites/areas. This will obviously entail consultation with Rūnanga and there will need to be a clear pathway for applicants to obtain written approval. While Council is supportive of iwi engagement, it is concerned that the existing resource capability of Rūnanga may pose a significant hurdle and result in limited notification as the default process, thereby having the perverse outcome of reduced engagement over cultural matters.	Council seeks assurances that there will be a written approval pathway for applicants and that Rūnanga have the capacity to deal with requests in a timely manner.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Grey District Council (S608)	S608.027	Sites and Areas of Significance to Māori	SASM -R5	Amend	Subsequent amendment for review of SASMs this Rule may require a re-write	Remove Rule
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.120	Sites and Areas of Significance to Māori	SASM -R5	Amend	See reason above for SASM permitted activity rules re: categories.	Amend activity standard 3 of SASM-R5 as follows: 3. On the following Sites and Areas of Significance to Māori identified in Schedule Three these only occur with the written approval from the relevant Poutini Ngāi Tahu rūnanga that is provided to the relevant District Council at least 10 working days prior to the activities commencing <b>on all sites listed in Table SASM-R5 below</b> . <del>i. and ii. All sites identified in Category Tahitoto and SASM 205 No. 2 Waioototo Native Reserve.</del> Insert Table SASM-R5
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.297	Sites and Areas of Significance to Māori	SASM -R6	Support	We support this rule.	Retain rule.
Stephen Page (S270)	S270.021	Sites and Areas of Significance to Māori	SASM -R6	Oppose	Of the 216 SASM's identified in Schedule Three, I have counted at least 88 that fall under one of the 4 designated categories highlighted above. The property owners of any one of these SASM's will be required to obtain written approval from Poutini Ngai Tahu and the confirmation of this approval must then be submitted to the council at least 10 days prior to the activity commencing.  Since this requirement apparently has legal effect, it is not a proposal and therefore not subject to debate or any consultation and could apply to even the most minor of activities contemplated by landowners. Since the wording and	Remove requirement for Poutini Ngai Tahu written approval.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					language used to write the SASM rules is somewhat vague and generalised, gaining written approval could be a wholly arbitrary process by Poutini Ngai Tahu.	
TiGa Minerals and Metals Limited (S493)	S493.040	Sites and Areas of Significance to Māori	SASM -R6	Amend	It is not considered appropriate for this rule to also apply to these activities.	Amend SASM - R6 as follows: SASM - R6 Earthworks ( <b>excluding minerals extraction, exploration and prospecting</b> ) Buildings and Structures not Provided for in SASM - R2 in Schedule Three - Sites and Areas of Significance to Māori
Leonie Avery (S507)	S507.024	Sites and Areas of Significance to Māori	SASM -R6	Oppose	Too restrictive.	SASM14 should be excluded from Schedule Three referred to in 1.i. The rule is generally too restrictive.
Jared Avery (S508)	S508.024	Sites and Areas of Significance to Māori	SASM -R6	Oppose	Too restrictive.	SASM14 should be excluded from Schedule Three referred to in 1.i. The rule is generally too restrictive.
Kyle Avery (S509)	S509.024	Sites and Areas of Significance to Māori	SASM -R6	Oppose	Too restrictive.	SASM14 should be excluded from Schedule Three referred to in 1.i. The rule is generally too restrictive.
Avery Bros (S510)	S510.024	Sites and Areas of Significance to Māori	SASM -R6	Oppose	Too restrictive.	SASM14 should be excluded from Schedule Three referred to in 1.i. The rule is generally too restrictive.
Bradshaw Farms (S511)	S511.024	Sites and Areas of Significance to Māori	SASM -R6	Oppose	Too restrictive.	SASM14 should be excluded from Schedule Three referred to in 1.i. The rule is generally too restrictive.
Paul Avery (S512)	S512.024	Sites and Areas of Significance to Māori	SASM -R6	Oppose	Too restrictive.	SASM14 should be excluded from Schedule Three referred to in 1.i. The rule is generally too restrictive.
Brett Avery (S513)	S513.024	Sites and Areas of Significance to Māori	SASM -R6	Oppose	Too restrictive.	SASM14 should be excluded from Schedule Three referred to in 1.i. The rule is generally too restrictive.
Steve Croasdale (S516)	S516.024	Sites and Areas of Significance to Māori	SASM -R6	Amend	Concerned about the uncertainty around this rule and how restrictive it is for my property.	Consider amending to be more enabling.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Buller District Council (S538)	S538.183	Sites and Areas of Significance to Māori	SASM -R6	Support in part	Council has an over-arching concern with permitted activity Rules 2 - 6. The permitted activities managed by these rules are qualified by the need to provide written approval from the relevant Poutini Ngāi Tahu Rūnanga to the relevant District Council for activities affecting specific scheduled sites/areas. This will obviously entail consultation with Rūnanga and there will need to be a clear pathway for applicants to obtain written approval. While Council is supportive of iwi engagement, it is concerned that the existing resource capability of Rūnanga may pose a significant hurdle and result in limited notification as the default process, thereby having the perverse outcome of reduced engagement over cultural matters.	Council seeks assurances that there will be a written approval pathway for applicants and that Rūnanga have the capacity to deal with requests in a timely manner.
Buller District Council (S538)	S538.184	Sites and Areas of Significance to Māori	SASM -R6	Oppose in part	In order for earthworks, buildings and structures within certain scheduled sites/areas to be undertaken as permitted activities, written approval from the relevant Poutini Ngāi Tahu Rūnanga is required regardless of the scale of the activity. Council is concerned that some of the SASMs cover areas with established residential development e.g. Orowaiti Road (SASM 14). The effect of the rule is that even minor structures such as glasshouses and woodsheds will require written approval and if not obtained, will trigger the need for consent. Council	Give consideration to amending Rule 6 to provide for minor structures and buildings without the need for affected party approval.  Insert a definition of 'upper slopes' into the Definition Section.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					<p>considers this to be onerous for landowners and requests consideration be given to allowing minor buildings/ structures within SASMs without affected party approval, subject to accidental discovery protocols.</p> <p>Clause 2 of the rule also refers to earthworks, buildings or structures located on the upper slopes of ancestral maunga. To ensure consistency of outcomes, Council seeks a definition of what would be considered 'upper slopes'.</p>	
Westpower Limited (S547)	S547.227	Sites and Areas of Significance to Māori	SASM -R6	Amend	<p>It is noted that SASM-R2 does not provide for buildings and structures, and it is not clear whether there should be a reference to SASM-R3. If earthworks do not comply with SASM-R2 can they comply with this Rule? It is submitted that there should be a level of earthworks provided to allow energy activities to continue to operate.</p>	<p>As above Westpower's preference is that one rule is developed to provide for energy activities, including energy aspects of infrastructure and critical infrastructure. Whilst not the preferred approach;</p> <p>(1) Amend the heading of SASM-R6, "SASM-R6 Earthworks, Buildings ... not provided for in, or <b>not complying with</b>, SASM-R2 in Schedule Three ...".</p> <p>(2) Amend Activity Status Standards, "<b>Activity Status Permitted Where:1. The area of land disturbed is limited to what is necessary to maintain the energy activity, including energy aspects of infrastructure and critical infrastructure; or</b>".</p> <p>(3) Add a new 2, "<b>2. The structure is for an energy activity, including energy aspects of infrastructure and critical infrastructure; or</b>".</p> <p>(4) Add a new 3., "<b>3. The activity is the replacement, reconstruction or addition to a building or structure used for an energy activity, including energy aspects of infrastructure and critical infrastructure; or</b>".</p> <p>(5) Amend current 1. to <b>4.</b></p>

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Minerals West Coast (S569)	S569.017	Sites and Areas of Significance to Māori	SASM -R6	Support	Minerals West Coast supports TTPP provisions concerning pounamu and aotea (bluestone).	Retain
WMS Group (HQ) Limited and WMS Land Co. Limited (S599)	S599.044	Sites and Areas of Significance to Māori	SASM -R6	Amend	The definition of earthworks would currently capture minerals extraction, exploration and prospecting	Amend SASM - R6 as follows: Earthworks ( <b>excluding minerals extraction, exploration and prospecting</b> ) Buildings and Structures not Provided for in SASM - R2 in Schedule Three - Sites and Areas of Significance to Māori
Grey District Council (S608)	S608.028	Sites and Areas of Significance to Māori	SASM -R6	Amend	Subsequent amendment for review of SASMs this Rule may require a re-write	Remove Rule
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.121	Sites and Areas of Significance to Māori	SASM -R6	Amend	Seek the removal of sites from rule	1. The activity does not occur on the following Sites and Areas of Significance to Māori identified in Table SASM-R6A below <del>Schedule Three</del> , except with written approval from the relevant Poutini Ngāi Tahu rūnanga which is provided to the relevant District Council at least 10 working days prior to the activity commencing. <del>i. All sites identified in Category Tahī (1), Category Rua (2), Category Toru</del> Insert Table SASM-R6 with the exception of <del>SASM4 Karamea (township) Native Reserve, SASM7 No. 47 Kongahu Native Reserve, SASM8 Mokihinui Native Reserve, SASM9 Waimangaroa Native Reserve, SASM14 (A &amp; B), SASM22 Ōkari Lagoon, SASM47 Māwheranui Native Reserve, SASM51 No. 34 Kōtukuwhakaoko Native Reserve, SASM66 No. 33 Kaiata Native Reserve, SASM 102 No.24 Hokitika Native Reserve and</del>
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.298	Sites and Areas of Significance to Māori	SASM -R7	Support	We support this rule.	Retain rule.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Alistair Cameron (S452)	S452.005	Sites and Areas of Significance to Māori	SASM -R7	Oppose	pounamu itself is already protected by law	Delete R7(3)
Alistair Cameron (S452)	S452.006	Sites and Areas of Significance to Māori	SASM -R7	Amend	pounamu itself is already protected by law	Amend Rule SASM - R7(3) to require <b>notification</b> to iwi prior to mining, rather than requiring approval from iwi.
Davis Ogilvie & Partners Ltd (S465)	S465.003	Sites and Areas of Significance to Māori	SASM -R7	Oppose	As the pounamu itself is already protected by law, we object to the requirement for written approval prior to mineral extraction or quarrying. This rule gives iwi de facto control over mining across a significant part of the West Coast, as mining could not proceed without iwi approval. This rule will create additional administration for iwi and result in potential delays for mining and is not acceptable. If the purpose of Rule SASM - R7(3) is to ensure that iwi is aware of mining activities so that they can monitor the possible extraction of pounamu, this could be achieved without requiring written approval.	That Rule SASM - R7(3) be amended to require evidence of notification to iwi prior to mining, rather than requiring approval from iwi.
Rocky Mining Limited (S474)	S474.042	Sites and Areas of Significance to Māori	SASM -R7	Oppose in part		deletion of the written approval trigger in SASM-R7
TiGa Minerals and Metals Limited (S493)	S493.041	Sites and Areas of Significance to Māori	SASM -R7	Amend	The use of a written approval to determine permitted activity status.	Amend SASM - R7 as follows: Activity Status Permitted Where: 1. ...; 3. In relation to other mineral extraction and quarrying activity: i. <b>The mineral extraction or quarrying activity complies with the Pounamu Vesting Act.</b> <del>Written approval is provided by the relevant Poutini Ngāi Tahu rūnanga – Te Rūnanga o Ngāi Waewae or Te Rūnanga o Makaawhio, that the activity can occur within the Pounamu and/or Aotea overlay(s) and the written confirmation shall be provided to the relevant district council at least 10 working days prior to</del>

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<del>the activity commencing-</del>
Federated Farmers of New Zealand (S524)	S524.055	Sites and Areas of Significance to Māori	SASM -R7	Amend	Heading and rule do not correlate, noting heading does not form part of the rule.	This rule needs to be clearer. Although the heading says farm quarry, the body of the rule references quarrying only (R7 (3)).
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.190	Sites and Areas of Significance to Māori	SASM -R7	Oppose in part	Condition/standard 3 would permit "other mineral extraction and quarrying activity". This activity is not appropriate for management under this rule, as it appears to not be related to aotea or pounamu.	Delete 3.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.473	Sites and Areas of Significance to Māori	SASM -R7	Amend	We are not clear whether these the extraction of aotea and pounamu can be appropriately considered "farm quarries" or "mineral extraction activities".	Consider adding a further condition/standard requiring compliance with conditions and standards of other permitted rules (and list the relevant rules) for "farm quarries and mineral extraction activities".
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.474	Sites and Areas of Significance to Māori	SASM -R7	Amend	We have also expressed our concerns with the ability of management Plans to adequately manage adverse effects on natural values, in particular on biodiversity.	Clarify how effects will be managed by Councils. Alternatively consider requiring consent for this activity.
Minerals West Coast (S569)	S569.018	Sites and Areas of Significance to Māori	SASM -R7	Support	Minerals West Coast supports TTPP provisions concerning pounamu and aotea (bluestone).	REtain
Koiterangi Lime Co LTD (S577)	S577.024	Sites and Areas of Significance to Māori	SASM -R7	Support	Support this rule.	Retain
WMS Group (HQ) Limited and WMS Land Co. Limited (S599)	S599.045	Sites and Areas of Significance to Māori	SASM -R7	Amend	Concerned about the use of a written approval to determine permitted activity status	Amend SASM - R7 as follows: Activity Status Permitted  Where: 1. In relation to extraction of Aotea: i. Any extraction of Aotea is only undertaken by Te Rūnanga o Makaawhio or their authorised representatives or contractors; ii. Where an Aotea Management Plan prepared by Te Rūnanga o Makaawhio exists,



Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<p>any extraction of Aotea is in accordance with that plan;</p> <p>iii. Where this is Aotea extraction in the Aotea overlay, notice of the activity is provided to the Westland District Council by Te Rūnanga o Makaawhio, at least 10 working days prior to the activity occurring.</p> <p>2. In relation to extraction of Pounamu:</p> <p>i. Any extraction of Pounamu is only undertaken by Te Rūnanga o Ngāti Waewae, Te Rūnanga o Makaawhio or their authorised representatives or contractors;</p> <p>ii. Where a Pounamu Management Plan prepared by Poutini Ngāi Tahu exists, any extraction of Pounamu is in accordance with that plan;</p> <p>iii. Where this Pounamu extraction is within the Pounamu overlay, notice of the activity is provided to the relevant district council by the relevant Poutini Ngāi Tahu rūnanga, at least 10 working days prior to the activity commencing;</p> <p>3. In relation to other mineral extraction and quarrying activity:</p> <p>i. <b>The mineral extraction or quarrying activity complies with the Pounamu Vesting Act.</b> <del>Written approval is provided by the relevant Poutini Ngāi Tahu rūnanga – Te Rūnanga o Ngāti Waewae or Te Rūnanga o Makaawhio, that the activity can occur within the Pounamu and/or Aotea overlay(s) and the written confirmation shall be provided to the relevant district council at least 10 working days prior to the activity commencing.</del></p>
Department of Conservation (S602)	S602.059	Sites and Areas of Significance to Māori	SASM -R7	Amend	Support Rule SASM-R7 and amend the rule to require that if HNZPT Archaeological Authority is required, that	Amend: Activity Status Permitted Where: In relation to extraction of Aotea: i. Any extraction of Aotea is only undertaken by

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					<p>this is obtained, or that HNZPT's written approval is provided.</p>	<p>Te Rūnanga o Makaawhio or their authorised representatives or contractors;</p> <p>i. Where an Aotea Management Plan prepared by Te Rūnanga o Makaawhio exists, any extraction of Aotea is in accordance with that plan;</p> <p>ii. Where this is Aotea extraction in the Aotea overlay, notice of the activity is provided to the Westland District Council by Te Rūnanga o Makaawhio, at least 10 working days prior to the activity occurring; <b>and</b>iii. <b>Where an Archaeological Authority is required by Heritage New Zealand - Pouhere Taonga, any extraction is undertaken in accordance with it, or the written approval of Heritage New Zealand - Pouhere Taonga is provided; and</b>In relation to extraction of Pounamu:</p> <p>ii. Any extraction of Pounamu is only undertaken by Te Rūnanga o Ngāti Waewae, Te Rūnanga o Makaawhio or their authorised representatives or contractors;</p> <p>i. Where a Pounamu Management Plan prepared by Poutini Ngāi Tahu exists, any extraction of Pounamu is in accordance with that plan;</p> <p>ii. Where this Pounamu extraction is within the Pounamu overlay, notice of the activity is provided to the relevant district council by the relevant Poutini Ngāi Tahu rūnanga, at least 10 working days prior to the activity commencing;iii. <b>Where an Archaeological Authority is required by Heritage New Zealand - Pouhere Taonga, any extraction is undertaken in accordance with it, or the written approval of Heritage New Zealand - Pouhere Taonga is provided; and</b></p> <p>iii. In relation to other mineral extraction and</p>

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						quarrying activity: i. Written approval is provided by the relevant Poutini Ngāi Tahu rūnanga - Te Rūnanga o Ngāti Waewae or Te Rūnanga o Makaawhio, that the activity can occur within the Pounamu and/or Aotea overlay(s) and the written confirmation shall be provided to the relevant district council at least 10 working days prior to the activity commencing; <b>and ii. Where an Archaeological Authority is required by Heritage New Zealand - Pouhere Taonga, any extraction is undertaken in accordance with it, or the written approval of Heritage New Zealand - Pouhere Taonga is provided.</b>
Grey District Council (S608)	S608.029	Sites and Areas of Significance to Māori	SASM -R7	Amend	Unless Pounamu and Aotea is identified as being present on the subject site then the use of the land should remain un-restricted.	Remove "Condition 3"
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.122	Sites and Areas of Significance to Māori	SASM -R7	Amend	Provides protection for aotea and pounamu without being onerous.	Amends as follows: 2. In relation to extraction of Pounamu: i. Any extraction of Pounamu is only undertaken by <b>Te Rūnanga o Ngāi Tahu</b> , Te Rūnanga o Ngāti Waewae, Te Rūnanga o Makaawhio or their authorised representatives or contractors;
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.394	Sites and Areas of Significance to Māori	SASM -R7	Amend	Seek activity status where compliance not achieved with Standard 2 is amended from Prohibited to Discretionary.	Activity status where compliance not achieved: Prohibited where Standard 1 <del>or 2</del> is not complied with, Discretionary where Standard <b>2 or 3</b> is not complied with.
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.400	Sites and Areas of Significance to Māori	SASM -R7	Amend	Poutini Ngai Tahu consider they do not need to be consulted around mineral extraction and quarrying activities outside of these new boundary	Delete requirement to consult with Poutini Ngai Tahu for mineral extraction and quarrying activities outside of these new boundary

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Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.299	Sites and Areas of Significance to Māori	SASM -R8	Support	We support this rule.	Retain rule.
Minerals West Coast (S569)	S569.019	Sites and Areas of Significance to Māori	SASM -R8	Support	Minerals West Coast supports TTPP provisions concerning pounamu and aotea (bluestone).	Retain
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.123	Sites and Areas of Significance to Māori	SASM -R8	Support	Provides protection for the aotea resource.	Retain as notified
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.300	Sites and Areas of Significance to Māori	SASM -R9	Support	We support this rule.	Retain rule.
Manawa Energy Limited (Manawa Energy) (S438)	S438.072	Sites and Areas of Significance to Māori	SASM -R9	Support in part	Manawa considers that the term 'network utility structure' should be replaced by 'regionally significant infrastructure'. Manawa Energy is not a network utility operator under the provisions of the Resource Management Act 1991, however the activities it undertakes (and associated assets) are identified as nationally and regionally significant infrastructure. The term 'regionally significant infrastructure' encompasses a number of network utility structures within the West Coast, and is considered to be a more appropriate term upon which to base this rule. This terminology is consistent with other changes sought by Manawa throughout the pTTPP.	Amend SASM R9 as follows: Maintenance, Repair and Upgrading of <del>Network Utility Structures</del> <b>Regionally Significant Infrastructure</b> on or within Sites and Areas of Significance to Māori identified in Schedule Three
Leonie Avery (S507)	S507.025	Sites and Areas of Significance to Māori	SASM -R9	Oppose	Too restrictive.	Delete rule or include SASM14 on the list of sites.

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Jared Avery (S508)	S508.025	Sites and Areas of Significance to Māori	SASM -R9	Oppose	Too restrictive.	Delete rule or include SASM14 on the list of sites.
Kyle Avery (S509)	S509.025	Sites and Areas of Significance to Māori	SASM -R9	Oppose	Too restrictive.	Delete rule or include SASM14 on the list of sites.
Avery Bros (S510)	S510.025	Sites and Areas of Significance to Māori	SASM -R9	Oppose	Too restrictive.	Delete rule or include SASM14 on the list of sites.
Bradshaw Farms (S511)	S511.025	Sites and Areas of Significance to Māori	SASM -R9	Oppose	Too restrictive.	Delete rule or include SASM14 on the list of sites.
Paul Avery (S512)	S512.025	Sites and Areas of Significance to Māori	SASM -R9	Oppose	Too restrictive.	Delete rule or include SASM14 on the list of sites.
Brett Avery (S513)	S513.025	Sites and Areas of Significance to Māori	SASM -R9	Oppose	Too restrictive.	Delete rule or include SASM14 on the list of sites.
Neil Mouat (S535)	S535.009	Sites and Areas of Significance to Māori	SASM -R9	Support	We support that maintenance, repair and Upgrading of Network Utility Structures on or within SASM 31 is a permitted activity.	Retain as notified.
Buller District Council (S538)	S538.185	Sites and Areas of Significance to Māori	SASM -R9	Support	Rule 9 is supported.	Retain as notified.
Westpower Limited (S547)	S547.231	Sites and Areas of Significance to Māori	SASM -R9	Amend	It is unclear how this rule relates to previous rules although it is noted that there are differences in activity types, applicable sites and when approval is required and when it is not throughout the rules. If non-compliance occurs for each of the previous rules can an activity be undertaken under this rule? It is unclear why buildings and earthworks, and based on	As above Westpower's preference is that one rule is developed to provide for energy activities, including energy aspects of infrastructure and critical infrastructure. Whilst not the preferred approach; (1) Amend the heading of SASM-R9, "SASM-R9 Maintenance, Repair, Upgrading of <b>Energy Activities</b> and Network Utility <b>Buildings</b> and Structures, <b>including associated Earthworks and Vegetation Clearance, on or within ...</b> ". (2) Add a new 1 under "Where:", " <b>1. The area of land disturbed is limited to what is necessary for the work required.</b> ". (3) Add a new 2 under "Where:", " <b>2. The area of</b>

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					reference to Rule R10 maintenance of vegetation, necessary to undertake these activities are also not included. These matters should be provided for to ensure potential activities are considered holistically.	<b>vegetation cleared is limited to that necessary to comply with electrical safety and hazard regulations, or maintain, repair or upgrade the building or structure.</b> (4) Renumber existing 1. to <b>3.</b>
Grey District Council (S608)	S608.030	Sites and Areas of Significance to Māori	SASM -R9	Amend	Subsequent amendment for review of SASMs this Rule may require a re-write	Remove Rule
Grey District Council (S608)	S608.627	Sites and Areas of Significance to Māori	SASM -R9	Support	Support this rule as its written	Retain as proposed
Avery Brothers (S609)	S609.024	Sites and Areas of Significance to Māori	SASM -R9	Oppose	Too restrictive.	Delete rule or include SASM14 on the list of sites.
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.124	Sites and Areas of Significance to Māori	SASM -R9	Amend	The list of sites is turned into a table and reference to Schedule Three is no longer required in the rule heading.	Amend rule heading as follows: Maintenance, Repair and Upgrading of Network Utility Structures on or within Sites and Areas of Significance to Māori <del>identified in Schedule Three.</del> Insert Table SASM-R9
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.393	Sites and Areas of Significance to Māori	SASM -R9	Amend	The activities can also occur within this area without the need for consideration by the relevant Poutini Ngāi Tahu Rūnanga.	Amend activity standard 1 of Rule SASM-R9 as follows: 1. The activity occurs in the following Sites and Areas of Significance to Māori as identified in <b>Table SASM-R9 below</b> in <del>Schedule Three.</del> i. SASM 10 Kawatiri Pa... xvii SASM 197 Okuru.
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.125	Sites and Areas of Significance to Māori	Controlled Activities	Amend	Ensure it is clear that the complete list of SASM sites in Schedule Three apply to this rule.	Amend rule to include wording to make it clear that all sites in the complete/full Schedule Three apply to this rule

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Misato Nomura (S151)	S151.003	Sites and Areas of Significance to Māori	SASM - R10	Oppose in part	<p>SASM17 is currently not listed in R9, making the same activity jump an activity status to R10, under controlled activities. The matters of control under R10 are related to the extent of earthworks and vegetation trimming or removal, as well as the cultural impacts on the sites significant to Maori.</p> <p>If a resource consent application is sought for this activity, the assessment of the matters of control will likely be done by the relevant Poutini Ngai Tahu Runanga instead of Council Planners as there are no permitted baselines for the physical aspects of earthworks and vegetation clearance taking place. If so, it will make more sense for this activity to be directly approved by the relevant Poutini Ngai Tahu Runanga. This way, it will save time and money not only for the applicant but also for council staff and all other relevant parties.</p>	That R10 becomes a permitted activity instead of a controlled activity. With the written approval from the relevant Poutini Ngai Tahu Runanga that is provided to the relevant District Council at least 10 working days prior to the activities commencing as per other permitted activities in this chapter.
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.301	Sites and Areas of Significance to Māori	SASM - R10	Support	We support this rule.	Retain rule.
Manawa Energy Limited (Manawa Energy) (S438)	S438.073	Sites and Areas of Significance to Māori	SASM - R10	Support in part	<p>Manawa considers that the term 'network utility structure' should be replaced by regionally significant infrastructure. Manawa is not a network utility operator under the provisions of the Resource Management Act 1991, however the activities it undertakes (and associated assets) are identified as nationally and regionally significant infrastructure. The term 'regionally significant infrastructure' encompasses a number of network utility structures within the West</p>	<p>Amend SASM - R10 as follows:  Maintenance, Repair and Upgrading of <del>Network Utility Structures</del> <b>Regionally Significant Infrastructure</b> on or within Sites and Areas in Schedule Three - Sites and Areas of Significance to Māori where Permitted Activity Standards are not met  Where: ...  2. The work is in an area that has previously been disturbed by the <del>network utility</del> <b>regionally significant infrastructure</b>; and ...</p>

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					Coast, and is considered to be a more appropriate term upon which to base this rule. This terminology is consistent with other changes sought by Manawa throughout the pTTPP.	
Leonie Avery (S507)	S507.026	Sites and Areas of Significance to Māori	SASM - R10	Oppose	Too restrictive.	Delete.
Jared Avery (S508)	S508.026	Sites and Areas of Significance to Māori	SASM - R10	Oppose	Too restrictive.	Delete.
Kyle Avery (S509)	S509.026	Sites and Areas of Significance to Māori	SASM - R10	Oppose	Too restrictive.	Delete.
Avery Bros (S510)	S510.026	Sites and Areas of Significance to Māori	SASM - R10	Oppose	Too restrictive.	Delete.
Bradshaw Farms (S511)	S511.026	Sites and Areas of Significance to Māori	SASM - R10	Oppose	Too restrictive.	Delete.
Paul Avery (S512)	S512.026	Sites and Areas of Significance to Māori	SASM - R10	Oppose	Too restrictive.	Delete.
Brett Avery (S513)	S513.026	Sites and Areas of Significance to Māori	SASM - R10	Oppose	Too restrictive.	Delete.
Buller District Council (S538)	S538.186	Sites and Areas of Significance to Māori	SASM - R10	Support in part	In certain circumstances the maintenance, repair and upgrading of network utilities within SASMs beyond permitted locations are controlled activities. One of the matters for consideration is the impacts of the activity on the cultural values on any site or area of significant to Māori (clause e.). The controlled status means consent is required to be granted, but Council is concerned with how the assessment of cultural values is to be undertaken without the direct input from the relevant	Retain as notified.



Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					Rūnanga. Council is not suggesting that the controlled status should change, but would welcome guidance on how clause (e) is to be met.	
Westpower Limited (S547)	S547.234	Sites and Areas of Significance to Māori	SASM - R10	Amend	Whilst the provision of a controlled activity status is supported it is submitted that the rule should be amended as per the amendments sought to permitted Rule SASM-R9. It is submitted that the proposed amendment regarding earthworks is adequately provided for through the "matters of control". Given that item 4 is not a specific matter arising in SASM-R9, it is unclear why it is a matter arising at this stage? Is the intent that such trimming is not permitted as this would be inappropriate for activities undertaken by Westpower from a safety, hazard maintenance and operation perspective?	As above Westpower's preference is that one rule is developed to provide for energy activities, including energy aspects of infrastructure and critical infrastructure. Whilst not the preferred approach; (1) Amend the heading of SASM-R10, "SASM-R10 Maintenance, Repair, Upgrading of <b>Energy Activities and Network Utility Buildings and Structures</b> , including associated Earthworks and Vegetation Clearance, on or within ...". (2) Amend item 2. by deleting a. and b. and adding a new a., " <b>a. The area of land disturbed is limited to what is necessary for the work required.</b> ". (3) Amend item 4., " <b>4. The area of vegetation cleared is limited to that necessary to comply with electrical safety and hazard regulations, or to maintain, repair or upgrade the building or structure.</b> ".
Avery Brothers (S609)	S609.025	Sites and Areas of Significance to Māori	SASM - R10	Oppose	Too Restrictive	Delete
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.126	Sites and Areas of Significance to Māori	SASM - R10	Amend	Due to amendments requested for other SASM rules which now refer to a specific table number ensure it is clear that the complete list of SASM sites in Schedule Three apply to this rule.	Amend rule to include wording to make it clear that all sites in the complete/full Schedule Three apply to this rule
Te Mana Ora (Community and Public Health) of the	S190.302	Sites and Areas of Significance to Māori	SASM - R11	Support	We support this rule.	Retain rule.

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NPWS/ Te Whatu Ora (S190)						
TiGa Minerals and Metals Limited (S493)	S493.042	Sites and Areas of Significance to Māori	SASM - R11	Amend	To enable mineral extraction to be notified to the relevant runanga.	Amend SASM-R11 as follows: Activity Status Discretionary <b>Notification: Applications for farm quarries and mineral extraction on sites and areas of significance to Māori will always be limited notified to the relevant Poutini Ngāi Tahu rūnanga (absent their written approval).</b>
Leonie Avery (S507)	S507.027	Sites and Areas of Significance to Māori	SASM - R11	Oppose	Too restrictive.	Delete.
Jared Avery (S508)	S508.027	Sites and Areas of Significance to Māori	SASM - R11	Oppose	Too restrictive.	Delete.
Kyle Avery (S509)	S509.027	Sites and Areas of Significance to Māori	SASM - R11	Oppose	Too restrictive.	Delete.
Avery Bros (S510)	S510.027	Sites and Areas of Significance to Māori	SASM - R11	Oppose	Too restrictive.	Delete.
Bradshaw Farms (S511)	S511.027	Sites and Areas of Significance to Māori	SASM - R11	Oppose	Too restrictive.	Delete.
Paul Avery (S512)	S512.027	Sites and Areas of Significance to Māori	SASM - R11	Oppose	Too restrictive.	Delete.
Brett Avery (S513)	S513.027	Sites and Areas of Significance to Māori	SASM - R11	Oppose	Too restrictive.	Delete.
Koiterangi Lime Co LTD (S577)	S577.025	Sites and Areas of Significance to Māori	SASM - R11	Support	Support this rule	Retain
WMS Group (HQ) Limited and WMS Land Co. Limited (S599)	S599.046	Sites and Areas of Significance to Māori	SASM - R11	Amend	Amendments have been sought to SASM-R7 which would make mineral extraction within the overlays permitted subject to adhering to the Pounamu Vesting Act	Amend SASM-R11 as follows: Activity Status Discretionary <b>Notification: Applications for farm quarries and mineral extraction on sites and areas of significance to Māori will always be limited</b>

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<b>notified to the relevant Poutini Ngāi Tahu rūnanga (absent their written approval).</b>
Grey District Council (S608)	S608.031	Sites and Areas of Significance to Māori	SASM - R11	Amend	Subsequent amendment for review of SASMs this Rule may require a re-write	Remove rule.
Avery Brothers (S609)	S609.026	Sites and Areas of Significance to Māori	SASM - R11	Oppose	Too restrictive.	Delete
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.128	Sites and Areas of Significance to Māori	SASM - R11	Amend	As a consequential amendment, we seek that the Rule title is amended to also reference Mineral Extraction of Pounamu.	Amend Rule title as follows: Farm Quarries, and Mineral Extraction <b>Activities and Extraction of Pounamu Activities</b> within the ....
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.401	Sites and Areas of Significance to Māori	SASM - R11	Amend	Poutini Ngai Tahu consider they do not need to be consulted around mineral extraction and quarrying activities outside of these new boundary	Delete requirement to consult with Poutini Ngai Tahu for mineral extraction and quarrying activities outside of these new boundary
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.303	Sites and Areas of Significance to Māori	SASM - R12	Support	We support this rule.	Retain rule.
Leonie Avery (S507)	S507.028	Sites and Areas of Significance to Māori	SASM - R12	Oppose	Too restrictive.	Delete.
Jared Avery (S508)	S508.028	Sites and Areas of Significance to Māori	SASM - R12	Oppose	Too restrictive.	Delete.
Kyle Avery (S509)	S509.028	Sites and Areas of Significance to Māori	SASM - R12	Oppose	Too restrictive.	Delete.
Avery Bros (S510)	S510.028	Sites and Areas of Significance to Māori	SASM - R12	Oppose	Too restrictive.	Delete.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Bradshaw Farms (S511)	S511.028	Sites and Areas of Significance to Māori	SASM - R12	Oppose	Too restrictive.	Delete.
Paul Avery (S512)	S512.028	Sites and Areas of Significance to Māori	SASM - R12	Oppose	Too restrictive.	Delete.
Brett Avery (S513)	S513.028	Sites and Areas of Significance to Māori	SASM - R12	Oppose	Too restrictive.	Delete.
Steve Croasdale (S516)	S516.025	Sites and Areas of Significance to Māori	SASM - R12	Amend	Concerned about the uncertainty around this rule and how restrictive it is for my property.	Amend to Controlled or Restricted Discretionary.
Buller District Council (S538)	S538.187	Sites and Areas of Significance to Māori	SASM - R12	Support	Rules 12 to 19 are supported, but an error in the rule referencing is noted for SASM-R12, where it refers to SASM-R14 when this should be SASM-R15.	Amend the performance standards of SASM-R12 to refer to SASM-R15 instead of SASM-R14 otherwise - Retain as notified.
Westpower Limited (S547)	S547.236	Sites and Areas of Significance to Māori	SASM - R12	Oppose	Rule is not appropriate for the undertaking of activities by Westpower.	Delete and Develop one rule to provide for all energy activities.
Westpower Limited (S547)	S547.240	Sites and Areas of Significance to Māori	SASM - R12	Amend		Amend: Notification: Applications for earthworks on ... notified to the relevant Ngai Tahu runanga <b>alone, and no other party will be notified.</b>
Chris & Jan Coll (S558)	S558.080	Sites and Areas of Significance to Māori	SASM - R12	Amend	rule incorrectly references SASM - R14 when it should be SASM - R15.	Amend 2. This is not Mineral Extraction subject to Rule SASM - <del>R14</del> <b>R15</b> ; and
Chris J Coll Surveying Limited (S566)	S566.080	Sites and Areas of Significance to Māori	SASM - R12	Amend	rule incorrectly references SASM - R14 when it should be SASM - R15.	Amend 2. This is not Mineral Extraction subject to Rule SASM - <del>R14</del> <b>R15</b> ; and
William McLaughlin (S567)	S567.163	Sites and Areas of Significance to Māori	SASM - R12	Amend	rule incorrectly references SASM - R14 when it should be SASM - R15.	Amend 2. This is not Mineral Extraction subject to Rule SASM - <del>R14</del> <b>R15</b> ; and
Laura Coll McLaughlin (S574)	S574.080	Sites and Areas of Significance to Māori	SASM - R12	Amend	rule incorrectly references SASM - R14 when it should be SASM - R15.	Amend 2. This is not Mineral Extraction subject to Rule SASM - <del>R14</del> <b>R15</b> ; and
Grey District Council (S608)	S608.032	Sites and Areas of Significance to Māori	SASM - R12	Amend	Subsequent amendment for review of SASMs this Rule may require a re-write	Remove rule.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Avery Brothers (S609)	S609.027	Sites and Areas of Significance to Māori	SASM - R12	Oppose	Too restrictive	Delete
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.129	Sites and Areas of Significance to Māori	SASM - R12	Amend	To make clear that the complete list of SASM sites in Schedule Three applies to condition 3 in this rule. This is a consequential change.	Amend Rule SASM-R12 as follows: 1. No earthworks or structures are located on the upper slopes, ridgelines or peaks of ancestral maunga identified in <b>Table SASM-R6B below Category Toru (3) in Schedule Three.</b> 2. This is not Mineral Extraction subject to Rule SASM - R154; and 3. This will not result in the destruction of a Site or Area of significance to Māori listed in Schedule Three. Insert Table SASM-R6B
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.304	Sites and Areas of Significance to Māori	SASM - R13	Support	We support this rule.	Retain rule.
Leonie Avery (S507)	S507.029	Sites and Areas of Significance to Māori	SASM - R13	Oppose	Too restrictive.	Delete.
Jared Avery (S508)	S508.029	Sites and Areas of Significance to Māori	SASM - R13	Oppose	Too restrictive.	Delete.
Kyle Avery (S509)	S509.029	Sites and Areas of Significance to Māori	SASM - R13	Oppose	Too restrictive.	Delete.
Avery Bros (S510)	S510.029	Sites and Areas of Significance to Māori	SASM - R13	Oppose	Too restrictive.	Delete.
Bradshaw Farms (S511)	S511.029	Sites and Areas of Significance to Māori	SASM - R13	Oppose	Too restrictive.	Delete.
Paul Avery (S512)	S512.029	Sites and Areas of Significance to Māori	SASM - R13	Oppose	Too restrictive.	Delete.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Brett Avery (S513)	S513.029	Sites and Areas of Significance to Māori	SASM - R13	Oppose	Too restrictive.	Delete.
Steve Croasdale (S516)	S516.026	Sites and Areas of Significance to Māori	SASM - R13	Amend	Concerned about the uncertainty around this rule and how restrictive it is for my property.	Amend to Controlled or Restricted Discretionary.
Buller District Council (S538)	S538.188	Sites and Areas of Significance to Māori	SASM - R13	Support	Rules 12 to 19 are supported, but an error in the rule referencing is noted for SASM-R12, where it refers to SASM-R14 when this should be SASM-R15.	Amend the performance standards of SASM-R12 to refer to SASM-R15 instead of SASM-R14 otherwise - Retain as notified.
Westpower Limited (S547)	S547.241	Sites and Areas of Significance to Māori	SASM - R13	Oppose	Not appropriate for the undertaking of activities by Westpower.	Delete and Develop one rule to provide for all energy activities.
Westpower Limited (S547)	S547.242	Sites and Areas of Significance to Māori	SASM - R13	Amend	Alternative relief - Clarify activities referred to in rules.	Amend heading: SASM-R13 Maintenance, Repair, Upgrading of <b>Energy Activities and</b> Network Utility <b>Buildings</b> and Structures, <b>including associated Earthworks and Vegetation Clearance</b> , on or within ... Controlled Activity Standards.
Westpower Limited (S547)	S547.243	Sites and Areas of Significance to Māori	SASM - R13	Amend	It should be clear that only the relevant Poutini Ngai Tahu runanga would be notified.	Amend: Notification: Applications for earthworks on ... notified to the relevant Ngai Tahu runanga <b>alone, and no other party will be notified.</b>
Avery Brothers (S609)	S609.028	Sites and Areas of Significance to Māori	SASM - R13	Oppose	Too restrictive	Delete
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.130	Sites and Areas of Significance to Māori	SASM - R13	Amend	For condition 1, see reason above in permitted activities SASM rules re: categories	Amend Rule SASM-R13 as follows: 1. There are not new structures on the upper slopes, ridgelines or peaks of ancestral maunga identified in <b>Table SASM-R6B below Category Toru (3) in Schedule Three.</b> Insert Table SASM-R6B
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.305	Sites and Areas of Significance to Māori	SASM - R14	Support	We support this rule.	Retain rule.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Leonie Avery (S507)	S507.030	Sites and Areas of Significance to Māori	SASM - R14	Oppose	Too restrictive.	Delete.
Leonie Avery (S507)	S507.047	Sites and Areas of Significance to Māori	SASM - R14	Oppose	We oppose SASM14 and the rules associated with it.	Delete SASM 14 or provide exclusions for it in associated rules.
Jared Avery (S508)	S508.030	Sites and Areas of Significance to Māori	SASM - R14	Oppose	Too restrictive.	Delete.
Jared Avery (S508)	S508.047	Sites and Areas of Significance to Māori	SASM - R14	Oppose	We oppose SASM14 and the rules associated with it.	Delete SASM 14 or provide exclusions for it in associated rules.
Kyle Avery (S509)	S509.030	Sites and Areas of Significance to Māori	SASM - R14	Oppose	Too restrictive.	Delete.
Kyle Avery (S509)	S509.047	Sites and Areas of Significance to Māori	SASM - R14	Oppose	We oppose SASM14 and the rules associated with it.	Delete SASM 14 or provide exclusions for it in associated rules.
Avery Bros (S510)	S510.030	Sites and Areas of Significance to Māori	SASM - R14	Oppose	Too restrictive.	Delete.
Avery Bros (S510)	S510.047	Sites and Areas of Significance to Māori	SASM - R14	Oppose	We oppose SASM14 and the rules associated with it.	Delete SASM 14 or provide exclusions for it in associated rules.
Bradshaw Farms (S511)	S511.030	Sites and Areas of Significance to Māori	SASM - R14	Oppose	Too restrictive.	Delete.
Bradshaw Farms (S511)	S511.047	Sites and Areas of Significance to Māori	SASM - R14	Oppose	We oppose SASM14 and the rules associated with it.	Delete SASM 14 or provide exclusions for it in associated rules.
Paul Avery (S512)	S512.030	Sites and Areas of Significance to Māori	SASM - R14	Oppose	Too restrictive.	Delete.
Paul Avery (S512)	S512.047	Sites and Areas of Significance to Māori	SASM - R14	Oppose	We oppose SASM14 and the rules associated with it.	Delete SASM 14 or provide exclusions for it in associated rules.
Brett Avery (S513)	S513.030	Sites and Areas of Significance to Māori	SASM - R14	Oppose	Too restrictive.	Delete.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Brett Avery (S513)	S513.047	Sites and Areas of Significance to Māori	SASM - R14	Oppose	We oppose SASM14 and the rules associated with it.	Delete SASM 14 or provide exclusions for it in associated rules.
Buller District Council (S538)	S538.189	Sites and Areas of Significance to Māori	SASM - R14	Support	Rules 12 to 19 are supported, but an error in the rule referencing is noted for SASM-R12, where it refers to SASM-R14 when this should be SASM-R15.	Amend the performance standards of SASM-R12 to refer to SASM-R15 instead of SASM-R14 otherwise - Retain as notified.
Westpower Limited (S547)	S547.244	Sites and Areas of Significance to Māori	SASM - R14	Oppose	Not appropriate for Westpower activities for the reasons discussed above.	Delete and Develop one rule to provide for all energy activities.
Westpower Limited (S547)	S547.245	Sites and Areas of Significance to Māori	SASM - R14	Amend	This rule, in its current form, is opposed as it is not appropriate for Westpower activities for the reasons discussed above. A range of amendments have been suggested to permitted activity provisions that could assist however the preferred option is the development of an appropriate permitted activity rule to provide for Westpower's activities and the outcomes sought by Poutini Ngai Tahu. Were this rule to be retained then it should be clear that only the relevant Poutini Ngai Tahu runanga would be notified of such applications, and no other party.	(1) Development of a specific suite of rules for Westpower activities in these areas. (2) Whilst not the preferred option were the rule to be retained the "Notification" commentary be amended, "Notification: Applications for earthworks on ... notified to the relevant Ngai Tahu runanga <b>alone, and no other party will be notified.</b> "
Grey District Council (S608)	S608.033	Sites and Areas of Significance to Māori	SASM - R14	Amend	Subsequent amendment for review of SASMs this Rule may require a re-write	Remove rule.
Avery Brothers (S609)	S609.029	Sites and Areas of Significance to Māori	SASM - R14	Oppose	Too restrictive	Delete
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae,	S620.318	Sites and Areas of Significance to Māori	SASM - R14	Amend	We seek an amendment to the numbering for this SASM as the SASM includes two sites in two different	Rename northern site SASM 14A and southern site SASM 14B. Amend Schedule 3 to allow for two sites. The revised Schedule 3 is attached to



Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Te Runanga o Makaawhio (S620)					locations. For ease of reference they have been relabelled as SASM 14A and SASM 14B.	this submission as Appendix Four. The amended SASM numbers are shown on the maps attached to this submission as Appendix Six.
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.306	Sites and Areas of Significance to Māori	SASM - R15	Support	We support this rule.	Retain rule.
New Zealand Coal & Carbon Limited (S472)	S472.012	Sites and Areas of Significance to Māori	SASM - R15	Oppose in part	We would welcome the provision of a discretionary activity status which would enable a consenting pathway and access to the effects management hierarchy, thereby allowing for a case by case consideration of the activity and the SAMS together with the mitigation and/or protection required.	Change the activity status of these rules from Non- Complying to Discretionary.
TiGa Minerals and Metals Limited (S493)	S493.043	Sites and Areas of Significance to Māori	SASM - R15	Amend	Non-complying activity status may be prohibitive.	Amend activity status: SASM - R15 Mineral Extraction by other than by Poutini Ngāi Tahu in Sites and Areas of Significance to Māori Activity Status Non-complying <b>Restricted Discretionary, with discretion restricted to the protection of the specific values associated with the SASM under Schedule 3.</b>
Leonie Avery (S507)	S507.031	Sites and Areas of Significance to Māori	SASM - R15	Oppose	Too restrictive.	Delete.
Jared Avery (S508)	S508.031	Sites and Areas of Significance to Māori	SASM - R15	Oppose	Too restrictive.	Delete.
Kyle Avery (S509)	S509.031	Sites and Areas of Significance to Māori	SASM - R15	Oppose	Too restrictive.	Delete.
Avery Bros (S510)	S510.031	Sites and Areas of Significance to Māori	SASM - R15	Oppose	Too restrictive.	Delete.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Bradshaw Farms (S511)	S511.031	Sites and Areas of Significance to Māori	SASM - R15	Oppose	Too restrictive.	Delete.
Paul Avery (S512)	S512.031	Sites and Areas of Significance to Māori	SASM - R15	Oppose	Too restrictive.	Delete.
Brett Avery (S513)	S513.031	Sites and Areas of Significance to Māori	SASM - R15	Oppose	Too restrictive.	Delete.
Steve Croasdale (S516)	S516.027	Sites and Areas of Significance to Māori	SASM - R15	Oppose	Too restrictive.	Delete
Steve Croasdale (S516)	S516.028	Sites and Areas of Significance to Māori	SASM - R15	Amend		Alternative relief:Amend to Discretionary.
Straterra (S536)	S536.006	Sites and Areas of Significance to Māori	SASM - R15	Oppose	We are concerned with the non-complying status of some of the rules in the Sites and Areas of Significance to Māori, in particular SASM-R15. This has come in amended provisions subsequent to the notification of the proposed plan.	Provide for a Discretionary Activity rather than non-complying
Buller District Council (S538)	S538.190	Sites and Areas of Significance to Māori	SASM - R15	Support	Rules 12 to 19 are supported, but an error in the rule referencing is noted for SASM-R12, where it refers to SASM-R14 when this should be SASM-R15.	Amend the performance standards of SASM-R12 to refer to SASM-R15 instead of SASM-R14 otherwise - Retain as notified.
Minerals West Coast (S569)	S569.022	Sites and Areas of Significance to Māori	SASM - R15	Amend	To allow existing arrangements between Ngāi Tahu iwi and alluvial gold miners to endure.	<b>...,or,2. An arrangement between Ngai Tahu iwi and alluvial gold miners is in place.</b>
Minerals West Coast (S569)	S569.023	Sites and Areas of Significance to Māori	SASM - R15	Amend	There often is a concurrence of the two, pounamu and alluvial gold, as they are found in the same places as a result of the same geological processes.	Amend activity status to <b>discretionary</b>
WMS Group (HQ) Limited and WMS Land Co. Limited (S599)	S599.047	Sites and Areas of Significance to Māori	SASM - R15	Amend	Not considered necessary to have a non-complying activity status for mineral extraction in sites and areas of significance to Maori	Amend SASM - R15 as follows: SASM - R15 Mineral Extraction by other than by Poutini Ngāi Tahu in Sites and Areas of Significance to Māori  Activity Status <del>Non-complying</del> <b>Restricted Discretionary</b> , with discretion restricted to the

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						protection of the specific values associated with the SASM under Schedule 3.
Birchfield Coal Mines Ltd (S601)	S601.031	Sites and Areas of Significance to Māori	SASM - R15	Amend	Continue to recognise the importance of the SASM zone and while allowing assessment of resource consent applications	Activity Status <del>Non-Complying</del> <b>Discretionary</b>
Grey District Council (S608)	S608.034	Sites and Areas of Significance to Māori	SASM - R15	Amend	Subsequent amendment for review of SASMs this Rule may require a re-write	Remove rule.
Avery Brothers (S609)	S609.030	Sites and Areas of Significance to Māori	SASM - R15	Oppose	Too restrictive	Delete
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.131	Sites and Areas of Significance to Māori	SASM - R15	Amend	Amend typo in the heading and include reference to Schedule 3.	Mineral Extraction by other than by Poutini Ngai Tahu in Sites and Areas of Significance to Māori in <b>Schedule Three.</b>
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.396	Sites and Areas of Significance to Māori	SASM - R15	Amend	Request that activity status is dropped from non-complying to discretionary after discussions with Mining Sector.	Change Activity Status from Non-complying to Discretionary
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.397	Sites and Areas of Significance to Māori	SASM - R15	Amend	Seek retention of the requirement for notification to the relevant Poutini Ngai Tahu rūnanga.	Retain the requirement for notification to the relevant Poutini Ngai Tahu rūnanga.
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.307	Sites and Areas of Significance to Māori	SASM - R16	Support	We support this rule.	Retain rule.
Leonie Avery (S507)	S507.032	Sites and Areas of Significance to Māori	SASM - R16	Oppose	Too restrictive.	Delete.
Jared Avery (S508)	S508.032	Sites and Areas of Significance to Māori	SASM - R16	Oppose	Too restrictive.	Delete.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Kyle Avery (S509)	S509.032	Sites and Areas of Significance to Māori	SASM - R16	Oppose	Too restrictive.	Delete.
Avery Bros (S510)	S510.032	Sites and Areas of Significance to Māori	SASM - R16	Oppose	Too restrictive.	Delete.
Bradshaw Farms (S511)	S511.032	Sites and Areas of Significance to Māori	SASM - R16	Oppose	Too restrictive.	Delete.
Paul Avery (S512)	S512.032	Sites and Areas of Significance to Māori	SASM - R16	Oppose	Too restrictive.	Delete.
Brett Avery (S513)	S513.032	Sites and Areas of Significance to Māori	SASM - R16	Oppose	Too restrictive.	Delete.
Steve Croasdale (S516)	S516.029	Sites and Areas of Significance to Māori	SASM - R16	Amend	Too restrictive.	Delete.
Steve Croasdale (S516)	S516.030	Sites and Areas of Significance to Māori	SASM - R16	Amend		Alternative relief:Amend to Discretionary.
Federated Farmers of New Zealand (S524)	S524.056	Sites and Areas of Significance to Māori	SASM - R16	Amend	Shelter belts are a common practice on farm and provide on farm benefits in terms of animal welfare, seasonal food and shelter for indigenous fauna. Shelter belts are smaller than plantation forestry so should not be captured by this rule.	Remove 'shelter belts' from SASM-R16
Buller District Council (S538)	S538.191	Sites and Areas of Significance to Māori	SASM - R16	Support	Rules 12 to 19 are supported, but an error in the rule referencing is noted for SASM-R12, where it refers to SASM-R14 when this should be SASM-R15.	Amend the performance standards of SASM-R12 to refer to SASM-R15 instead of SASM-R14 otherwise - Retain as notified.
Chris & Jan Coll (S558)	S558.081	Sites and Areas of Significance to Māori	SASM - R16	Amend	this rule is too restrictive and should be a Discretionary Activity.	Amend status to Discretionary.
Chris & Jan Coll (S558)	S558.082	Sites and Areas of Significance to Māori	SASM - R16	Support	Application will always be limited notified to the relevant Poutini Ngāi Tahu rūnanga.	Retain

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Chris J Coll Surveying Limited (S566)	S566.081	Sites and Areas of Significance to Māori	SASM - R16	Amend	this rule is too restrictive and should be a Discretionary Activity.	Amend status to Discretionary.
Chris J Coll Surveying Limited (S566)	S566.082	Sites and Areas of Significance to Māori	SASM - R16	Support	Application will always be limited notified to the relevant Poutini Ngāi Tahu rūnanga.	Retain
William McLaughlin (S567)	S567.164	Sites and Areas of Significance to Māori	SASM - R16	Amend	this rule is too restrictive and should be a Discretionary Activity.	Amend status to Discretionary.
William McLaughlin (S567)	S567.165	Sites and Areas of Significance to Māori	SASM - R16	Support	Application will always be limited notified to the relevant Poutini Ngāi Tahu rūnanga.	Retain
Avery Brothers (S609)	S609.031	Sites and Areas of Significance to Māori	SASM - R16	Oppose	Too restrictive	Delete
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.132	Sites and Areas of Significance to Māori	SASM - R16	Support	Support the minor amendment process for this rule	Retain as changed by the minor amendment process
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.405	Sites and Areas of Significance to Māori	SASM - R16	Amend	Ensure the rules do not capture other unintended activities.	Amend rule SASM-R16 so that it does not apply to amenity plantings.
Kirsty Henderson (S125)	S125.011	Sites and Areas of Significance to Māori	SASM - R17	Oppose	This clause is too restrictive and could thwart any new builds in Punakaiki. This SASM encompasses the entire residential and commercial area of Punakaiki which has no town treatment plant and is reliant on individual septic tank systems. This clause seems to allow lwi to not allow replacement of current systems - if your septic tank fails can you replace with a new one, or expansion of current ones, which may be necessary due to new development, increased tourist numbers etc. It is not	Remove the ability for lwi to stop reasonable development on grounds of not allowing any changes to or new wastewater disposal.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					reasonable for Iwi to prevent this on private land.	
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.308	Sites and Areas of Significance to Māori	SASM - R17	Support	We support this rule.	Retain rule.
Horticulture New Zealand (S486)	S486.027	Sites and Areas of Significance to Māori	SASM - R17	Oppose in part	The rule includes hazardous facilities, but the plan does not define or include rules for hazardous facilities. The reference should be to 'major hazard facility'.	Amend SASM-R17 by deleting 'hazardous facilities' and replacing with 'major hazard facility' and define as sought above.
Leonie Avery (S507)	S507.033	Sites and Areas of Significance to Māori	SASM - R17	Oppose	Too restrictive.	Delete.
Jared Avery (S508)	S508.033	Sites and Areas of Significance to Māori	SASM - R17	Oppose	Too restrictive.	Delete.
Kyle Avery (S509)	S509.033	Sites and Areas of Significance to Māori	SASM - R17	Oppose	Too restrictive.	Delete.
Avery Bros (S510)	S510.033	Sites and Areas of Significance to Māori	SASM - R17	Oppose	Too restrictive.	Delete.
Bradshaw Farms (S511)	S511.033	Sites and Areas of Significance to Māori	SASM - R17	Oppose	Too restrictive.	Delete.
Paul Avery (S512)	S512.033	Sites and Areas of Significance to Māori	SASM - R17	Oppose	Too restrictive.	Delete.
Brett Avery (S513)	S513.033	Sites and Areas of Significance to Māori	SASM - R17	Oppose	Too restrictive.	Delete.
Federated Farmers of New Zealand (S524)	S524.057	Sites and Areas of Significance to Māori	SASM - R17	Oppose in part	The rule includes hazardous facilities but these are not defined. A definition for major hazard facility is sought in relation to the hazardous substances provisions. SASM-R17 should refer to major hazard facilities.	Amend SASM-R17 by deleting hazardous facilities and replacing with 'major hazard facility' and define as sought above.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Buller District Council (S538)	S538.192	Sites and Areas of Significance to Māori	SASM - R17	Support	Rules 12 to 19 are supported, but an error in the rule referencing is noted for SASM-R12, where it refers to SASM-R14 when this should be SASM-R15.	Amend the performance standards of SASM-R12 to refer to SASM-R15 instead of SASM-R14 otherwise - Retain as notified.
Chris & Jan Coll (S558)	S558.083	Sites and Areas of Significance to Māori	SASM - R17	Amend	this rule is too restrictive and should be a Discretionary Activity.	Amend status to Discretionary.
Chris & Jan Coll (S558)	S558.084	Sites and Areas of Significance to Māori	SASM - R17	Support	Application will always be limited notified to the relevant Poutini Ngāi Tahu rūnanga.	Retain
Chris J Coll Surveying Limited (S566)	S566.083	Sites and Areas of Significance to Māori	SASM - R17	Amend	this rule is too restrictive and should be a Discretionary Activity.	Amend status to Discretionary.
Chris J Coll Surveying Limited (S566)	S566.084	Sites and Areas of Significance to Māori	SASM - R17	Support	Application will always be limited notified to the relevant Poutini Ngāi Tahu rūnanga.	Retain
William McLaughlin (S567)	S567.166	Sites and Areas of Significance to Māori	SASM - R17	Amend	this rule is too restrictive and should be a Discretionary Activity.	Amend status to Discretionary.
William McLaughlin (S567)	S567.167	Sites and Areas of Significance to Māori	SASM - R17	Support	Application will always be limited notified to the relevant Poutini Ngāi Tahu rūnanga.	Retain
Grey District Council (S608)	S608.035	Sites and Areas of Significance to Māori	SASM - R17	Amend	Subsequent amendment for review of SASMs this Rule may require a re-write	Remove rule.
Avery Brothers (S609)	S609.032	Sites and Areas of Significance to Māori	SASM - R17	Oppose	Too restrictive	Delete
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.133	Sites and Areas of Significance to Māori	SASM - R17	Support	Support the minor amendment process for this rule. Note submission point in the definitions section around terms within this rule.	Retain as changed by the minor amendment process
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.309	Sites and Areas of Significance to Māori	SASM - R18	Support	We support this rule.	Retain rule.

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Straterra (S536)	S536.007	Sites and Areas of Significance to Māori	SASM - R18	Oppose	We are concerned with the non-complying status of some of the rules in the Sites and Areas of Significance to Māori, in particular SASM-R18. This has come in amended provisions subsequent to the notification of the proposed plan.	Provide for a Discretionary Activity rather than non-complying
Buller District Council (S538)	S538.193	Sites and Areas of Significance to Māori	SASM - R18	Support	Rules 12 to 19 are supported, but an error in the rule referencing is noted for SASM-R12, where it refers to SASM-R14 when this should be SASM-R15.	Amend the performance standards of SASM-R12 to refer to SASM-R15 instead of SASM-R14 otherwise - Retain as notified.
Grey District Council (S608)	S608.036	Sites and Areas of Significance to Māori	SASM - R18	Amend	Subsequent amendment for review of SASMs this Rule may require a re-write	Remove Rule
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.134	Sites and Areas of Significance to Māori	SASM - R18	Support	Support the minor amendment process for this rule.	Retain as changed by the minor amendment process
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.310	Sites and Areas of Significance to Māori	SASM - R19	Support	We support this rule.	Retain rule.
TiGa Minerals and Metals Limited (S493)	S493.044	Sites and Areas of Significance to Māori	SASM - R19	Oppose	A prohibited activity status is problematic, minerals extraction may coincide with target resource.	Delete SASM - R19
Buller District Council (S538)	S538.194	Sites and Areas of Significance to Māori	SASM - R19	Support	Rules 12 to 19 are supported, but an error in the rule referencing is noted for SASM-R12, where it refers to SASM-R14 when this should be SASM-R15.	Amend the performance standards of SASM-R12 to refer to SASM-R15 instead of SASM-R14 otherwise - Retain as notified.
Koiterangi Lime Co LTD (S577)	S577.026	Sites and Areas of Significance to Māori	SASM - R19	Support	Support this rule	Retain
Koiterangi Lime Co LTD (S577)	S577.030	Sites and Areas of Significance to Māori	SASM - R19	Support	Support this rule	Retain
WMS Group (HQ) Limited and WMS	S599.048	Sites and Areas of Significance to Māori	SASM - R19	Oppose	Prohibited activity status is problematic, as minerals extraction may sometimes	Delete SASM - R19



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Land Co. Limited (S599)					involve inadvertent extraction of Pounamu which is not the target resource	
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.135	Sites and Areas of Significance to Māori	SASM - R19	Amend	Request removing the reference to mineral extraction of pounamu in this rule after discussions with the Mining Sector.	Amend Rule heading as follows: Mineral extraction or Fossicking of Aotea <del>or Mineral Extraction of Pounamu</del> by anyone other than Poutini Ngai Tahu in the Pounamu-Aotea Overlay area not meeting Rule SASM-R7 or <b>Rule SASM-R8.</b>
Misato Nomura (S151)	S151.006	Natural Environment Values	Natural Environment Values	Amend	There are currently too many overlay layers that makes the plan harder to read. Some of the overlays are similar and it is not clear if it is necessary to have them separated.	To combine or delete some of the overlays present.
West Coast Penguin Trust (S275)	S275.012	Natural Environment Values	Natural Environment Values	Amend	We believe TTPP will play a critical role in the protection of native species such as penguins, seabirds and shorebirds. We are not planners, but we have endeavoured to suggest ways that the TTPP could be amended to improve the protection of native wildlife. Should there be better ways or more appropriate places to include the higher level of protection that we recommend, we trust that the changes can be incorporated by the expert planning team so that the changes can be most effective and clearly understood and applied by end users.	Incorporate changes to the plan that provides a higher level of protection for penguins, seabirds and shoreboards.
Riarnne Klempel (S296)	S296.005	Natural Environment Values	Natural Environment Values	Amend	Please consider protection for all old growth forest on the Westcoast. I submit to have this carbon valued and counted and income earned, it's a renewable earner over a much longer time frame than mining or dairying. A means to assess the volume of such carbon and to move to return an economic value to landowners for the value of all carbon sinks, or to have the crown recognise the	Protect all old growth forest on the Westcoast and provide for their value as carbon sinks.

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					<p>value of the carbon it can retain or increase within its land holdings. Carbon has a value and a cost, the value of retaining carbon needs to be included in the TTPP plan and a means to do so identified and promoted.</p> <p>The per ton value of this carbon can only increase into the near future, why are we not farming the natural resource and value that this provides in a less damaging and more sustainable way. Native forest and wetlands sequester far more carbon than land comparatively denuded for agriculture, mining or urban development. Biodiversity is necessary to maintain a healthy ecosystem and hence a better forest sequestration of carbon.</p>	
David Marshall (S347)	S347.006	Natural Environment Values	Natural Environment Values	Support	<p>It is good to see an attempt to zone Natural Character/ Sites of Outstanding Natural/Feature/Landscape. Without legislation these sites of natural importance cannot be protected. Stress should be placed on the protection/restoration of lowland forest area, as this is the most essential for wildlife and waterways, but simultaneously the most vulnerable to damage. Kawatiri / Buller is still to make a thorough assessment of naturally significant sites, which although an enormous task, should follow the lead of Grey District, who have already begun this process. This is one of the most beautiful and naturally abundant parts of the country and it is important to have some guidelines to protect it from any wasteful misuse. It is a big part of what makes this place special.</p>	Implementation of Natural Environmental Values plan. Emphasis to be placed on protection/restoration of lowland forest. This could be supported through policy making specific to these areas.

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G.E. and C.J. Coates on behalf of Nikau Deer Farm Limited (S415)	S415.004	Natural Environment Values	Natural Environment Values	Oppose	Erosion of private property rights. Section 32 analysis has not been adequately done. Research into what the terms; significance, values, features and character mean in relation to this section has not been done. As an example, we offered an area of land that was a proposed SNA to DOC and they said it was not significant enough to purchase. This brings to question the analysis of how significant is significant? It discredits the identification of Natural Environment Values.	Remove the Natural Environmental Values Section until adequate analysis has been done as laid out in Section 32. These areas have not been correctly identified as illustrated in our example in the reasons section. They need to be redone correctly. The private information gathered is to be kept private (Central Government required to find a solution to this).
Rocky Mining Limited (S474)	S474.005	Natural Environment Values	Natural Environment Values	Amend	RML seek the retention and further recognition of mineral extraction's functional and operational need in all overlay chapters	Include a restricted discretionary rule in the overlay chapters for mineral extraction, or at minimum activities with a functional and operational need - discretion should be restricted to the values of the particular overlay.
Rocky Mining Limited (S474)	S474.032	Natural Environment Values	Natural Environment Values	Amend		seek recognition within all overlay chapters that mineral extraction has a functional and operational need to locate where the resource is, and that this functional and operational need be given due consideration in resource consent applications within the specific overlay;
Rocky Mining Limited (S474)	S474.035	Natural Environment Values	Natural Environment Values	Amend		seek that directive overlay provisions seeking to "avoid, protect, prevent" or "minimise, restrict and preserve" should be limited to situations where they are warranted (i.e. for significant adverse effects, or in environments meeting significance criteria (such as SASM or Significant Natural Areas)) because they can be problematic for passing the gateway test;
Rocky Mining Limited (S474)	S474.039	Natural Environment Values	Natural Environment Values	Amend		overlay chapters contain a restricted discretionary rule for mining, with discretion restricted to effects on the specific overlay or

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						overlay values;
West Coast Regional Council (S488)	S488.022	Natural Environment Values	Natural Environment Values	Oppose	Maps and rules place undue burden on property owners through making areas of their land non-productive. Excluding areas of land from productive purposes does not provide for the social and economic wellbeing of West Coast Communities. The objectives, policies, rules and accompanying maps result in adverse consequences on West Coast Communities.	That the Plan is refined to ensure there are no adverse effects on the social or economic wellbeing of West Coast people and communities, and no undue burden is placed on the West Coast Community from the proposed Plan provisions. The Council seeks to be a party to the refinement of objectives, policies, rules and accompanying maps for ecosystems and indigenous biodiversity, natural character, natural features and landscape provisions.
Papahaua Resources Limited (S500)	S500.021	Natural Environment Values	Natural Environment Values	Amend		seek recognition within all overlay chapters that mineral extraction has a functional and operational need to locate where the resource is, and that this functional and operational need be given due consideration in resource consent applications within the specific overlay;
Papahaua Resources Limited (S500)	S500.024	Natural Environment Values	Natural Environment Values	Amend		seek that directive overlay provisions seeking to "avoid, protect, prevent" or "minimise, restrict and preserve" should be limited to situations where they are warranted (i.e. for significant adverse effects, or in environments meeting significance criteria (such as SASM or Significant Natural Areas)) because they can be problematic for passing the gateway test;
Papahaua Resources Limited (S500)	S500.029	Natural Environment Values	Natural Environment Values	Amend		seek that overlay chapters contain a restricted discretionary rule for mining, with discretion restricted to effects on the specific overlay or overlay values;
Hadley Mills (S534)	S534.003	Natural Environment Values	Natural Environment Values	Amend		That a series of permitted activity rules be written to allow for future bush clearing, earthworks, waterway culverts, bridge building and any other activities and land use associated with the development, use and maintenance of multi-use recreation trails (similar to the West

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						Coast Wilderness Trail). These permitted activities should cut across all overlays except for perhaps wetlands layers. Permitted activities should have strict environmental conditions regarding things like, clearance width, earthworks volume limits /km etc.
Buller Conservation Group (S552)	S552.006	Natural Environment Values	Natural Environment Values	Oppose	The objective is both protection and exploitation	The 2 opposing objectives need to be separated out into two independent objectives
Buller Conservation Group (S552)	S552.059	Natural Environment Values	Natural Environment Values	Amend	it is not the Plan but the authority that is responsible.	<b>Territorial authorities are Te Tai o Poutini Plan</b> is responsible for protecting and maintaining terrestrial(land-based) ecosystems, including the margins of the coast and waterbodies <b>The relevant section numbers of the Act need to be mentioned in this paragraph, including sections 31 and 17</b>
Buller Conservation Group (S552)	S552.060	Natural Environment Values	Natural Environment Values	Amend	It is not the Plan but the authority that is responsible.	The RMA requires <b>territorial authorities Te Tai o Poutini Plan</b> to manage indigenous biodiversity in two particular ways
Frida Inta (S553)	S553.006	Natural Environment Values	Natural Environment Values	Oppose	Includes the objective of both protection and exploitation	The 2 opposing objectives need to be separated out into two independent objectives
Frida Inta (S553)	S553.027	Natural Environment Values	Natural Environment Values	Amend	More protection must be provided to our major rivers, streams and their riparian margins.	Include a link to the relevant section of the Regional Land and Water Plan would be appropriate here.
Frida Inta (S553)	S553.059	Natural Environment Values	Natural Environment Values	Amend	it is not the Plan but the authority that is responsible.	<b>Territorial authorities are Te Tai o Poutini Plan</b> is responsible for protecting and maintaining terrestrial(land-based) ecosystems, including the margins of the coast and waterbodies

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Frida Inta (S553)	S553.060	Natural Environment Values	Natural Environment Values	Amend	It is not the Plan but the authority that is responsible.	The RMA requires <del>territorial authorities</del> Te Tai o Poutini Plan to manage indigenous biodiversity in two particular ways including through sections 31 and 17.
Groundswell NZ (S562)	S562.006	Natural Environment Values	Natural Environment Values	Oppose	These fail to meet the purpose of the RMA. We submit natural, historic, and cultural values be protected through an alternative mechanism that is outcomes focused and supports and empowers property owners. We would like to discuss options. One of those options is an action plan that sits outside the formal plan but is referenced as meeting the councils RMA requirements.	The sections relating to the following RMA Section 6 zoning issues be removed <ul style="list-style-type: none"> <li>• Significant Natural Areas (SNA)</li> <li>• Outstanding Natural Landscapes, Outstanding Natural Features and other landscape zonings coming under various names</li> <li>• Sites and Areas of Significance to Maori (SASM), cultural sites, and cultural landscapes</li> <li>• Wetlands</li> <li>• Riparian margins</li> </ul>
Department of Conservation (S602)	S602.061	Natural Environment Values	Natural Environment Values	Amend	The overview in the title page requires minor amendments to include the margins of waterbodies.	Amend the overview: This section will include the provisions for ecosystems and indigenous biodiversity, natural character, natural features and landscapes and <del>public access</del> <b>the margins of waterbodies</b> . It will identify the specific features and places on the West Coast that are important to those values, including any Outstanding Landscapes or Significant Natural Areas. It will also include the Objectives, Policies and any Rules for the management of these areas.
Department of Conservation (S602)	S602.062	Natural Environment Values	Natural Environment Values	Neutral	DOC is neutral as these do not affect priority conservation values, biodiversity values, or DOC's interests.	NA
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.191	Ecosystems and Indigenous Biodiversity	ECO	Amend	The matters set out in the Key Issues section above in this submission, under the heading "Identification and protection of SNAs" are also relevant to this chapter	Amend as sought in Key Issues above.

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					and may include amendments to address relief sought.	
Grey District Council (S608)	S608.037	Ecosystems and Indigenous Biodiversity	ECO	Amend	It is sought that the SASM overlay is removed and sites re-assessed/re-reviewed	Remove all references to "Site or Area of Significance to Māori" in the Chapter
Nicholas Johnston (S14)	S14.007	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity	Oppose	You are giving two or three different status on properties owned by iwi, government/council/doc and private non maori land owners and this is discrimination and are being racist.	Treat all land tenures the same with regards to ecosystems and biodiversity. Iwi, government, Council and DOC land should all be treated the same.
Nicholas Johnston (S14)	S14.008	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity	Oppose	Protect the land you own already and stop imposing restrictions on the land you don't own.	Remove restrictions on private land for indigenous biodiversity.
Nicholas Johnston (S14)	S14.010	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity	Oppose	I submitted against this last time and nothing was done. The previous owner also opposed the areas in question and also wasn't heard just imposed and walked over.	<b>Delete provisions in relation to ecosystems and biodiversity.</b>
Christine Anderson (S88)	S88.001	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity	Support	As I understand the proposed new plan is for only the SNA area itself to be on your title. I am in favour of this if this is correct. I object to paying rates on SNA ground.	Retain approach to SNAs in Grey District.
Anna Bradley (S90)	S90.001	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity	Support	As I understand the proposed new plan is for only the SNA area itself to be on your title. I am in favour of this if this is correct.	Retain the approach to SNAs in the Grey District.
Anna Bradley (S90)	S90.002	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity	Amend	I object to paying rates on SNA ground.	Introduce Rates Relief for SNA land.
Paul Elwell-Sutton (S144)	S144.001	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity	Amend	The characteristic ecosystems and indigenous biodiversity of much lowland area of the Coast is poorly or not protected, especially that on privately held land. Lowland ecosystems and biodiversity are poorly represented on West Coast PCL, so these values require assessment and	While I support the intention of this section I request that throughout all the Plan's objectives, policies and rules, the health, integrity and life-supporting properties of indigenous ecosystems and biodiversity are comprehensively protected, supported and enhanced, such that all other objectives, policies and rules are overridden by those of the indigenous ecosystems and

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					protection. While some landowners may be aware of the ecological values and biodiversity on their properties, and wish to protect it, not all will, so the Plan must be robust and even-handed..	biodiversity.
Westland District Council (S181)	S181.014	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity	Support	Westland District Council supports these Objectives, Policies and Rules	Retain the objectives, policies and rules
John Caygill (S290)	S290.008	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity	Amend	The protection requirements for significant indigenous vegetation and significant habitats of indigenous fauna, and mandated by the RMA (section 6), and set-out in the RPS, should be included in the plan.	Amend the provisions so that the protection requirements for significant indigenous vegetation and significant habitats of indigenous fauna, and mandated by the RMA (section 6), and set-out in the RPS, are included in the plan.
Transpower New Zealand Limited (S299)	S299.072	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity	Amend	As currently drafted, the ECO chapter would apply to the National Grid and while Transpower is not necessarily opposed to this approach, it does seek clarification as to the relationship to the Energy Chapter, particularly in light of the National Grid specific policies within the ENG chapter which adopts a "seek to avoid" approach for the National Grid (specifically policy ENG-P8). It is further noted that many provisions within the ECO chapter apply to indigenous vegetation and are not confined to significant indigenous vegetation. This has wide implications for many activities. There is also a mix of terminology used. Transpower seeks clarification over the application of the rules.	Clarify the relationship between activities within the Energy Chapter and those within the Ecosystems and Indigenous Biodiversity Chapter
Inger Perkins (S462)	S462.009	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity	Amend	With work almost complete on the new National Policy Statement for Indigenous Biodiversity, it must surely be appropriate to refer at least to the Draft NPSIB in	Specifically refer to the draft NPSIB and how this will be implemented to protect indigenous biodiversity



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					TTPP and ideally acknowledge the role the new NPS will play across the region to help protect precious flora and fauna once gazetted.	
Inger Perkins (S462)	S462.010	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity	Amend	Previous District Plans and now TTPP expect that indigenous vegetation on public conservation land will be protected and plan policies effectively hand the role of protector to the Department of Conservation, abdicating responsibility. However, for many years this expected protection has not been the case. Mining has been approved over public conservation land that generally has Stewardship or Conservation Park status and includes precious indigenous vegetation.	Ensure that wherever significant indigenous vegetation and significant habitats of indigenous fauna exist, they are protected through TTPP whatever the status, ownership or management of the land.
Katherine Gilbert (S473)	S473.002	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity	Oppose	There is a very false justification for enabling mining in this plan and lack of recognition of the importance of Significant Natural Areas. It is saying that since there is such a large area of Public Conservation this means there is no need for further protection of indigenous vegetation including the setting aside of SNAs. I assert that SNAs do need to be assessed in the same way all across New Zealand, not differently on the West Coast.	Amend plan to ensure there is a rule framework that requires SNAs to be identified and mapped across the entire West Coast region, and for these areas to be listed in the plan, according to the West Coast Regional Policy Statement (RPS) Appendix 1 significance criteria.
Katherine Gilbert (S473)	S473.009	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity	Amend	The ttp plan seems to ignore conservation values seeing them as non-existent throughout the region. The proposed approach risks further biodiversity loss in a major way	Amend the plan provisions to ensure that indigenous biodiversity is maintained, and Significant Natural Areas (SNAs) are protected from new mineral prospecting, mineral extraction activities and ancillary activities.
Lynley Hargreaves (S481)	S481.002	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity	Amend	The plan does not provide sufficient protection for indigenous biodiversity	Increase the protections for indigenous biodiversity.

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Lynley Hargreaves (S481)	S481.026	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity	Amend	The Ecosystems chapter does not mention climate, despite ecosystems helping to prevent climate change as carbon sinks, mitigating flooding and landslides, and climate change posing a threat to the indigenous biodiversity the councils are tasked with protecting.	Amend the chapter to recognise climate change and the value that ecosystems play in mitigating climate change and its effects.
Horticulture New Zealand (S486)	S486.088	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity	Amend	The issue of biosecurity relates to the maintenance and enhancement of biodiversity values in the district. There is a need for rapid response in the event of a biosecurity incursion of an unwanted organism. Vegetation removal, burial, burning and spraying of material are methods that may be used. It is therefore important that the plan adequately provides for these activities to be undertaken.	HortNZ seeks provisions to provide for the active management of pest plants and pest animals including those identified in the Regional Pest Management Plan and unwanted organisms under the Biosecurity Act 1993.
Michael Snowden (S492)	S492.012	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity	Amend	The imposition of an SNA without compensation being offered is expropriation of private property.	Provide for a comprehensive range of non-regulatory assistance to SNA landowners including rates relief, support for fencing and covenants and land swaps with DOC.
Aggregate and Quarry Association (S521)	S521.002	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity	Amend	A requirement of the District Plan to give effect to West Coast Regional Policy Statement	Amend to give effect to the WCRPS
Aggregate and Quarry Association (S521)	S521.020	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity	Amend	A major concern with the plan relates to the impact of SNAs and ONLs in the transition period	Amend to clarify how the enabling provisions, both in the extractive zones and outside, will effect plan users
Straterra (S536)	S536.019	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity	Oppose	We note that the terminology for much of this chapter is very directive. Words such as 'avoid', 'protect' and 'prevent' are used. Not only do these remove scope for, but they contradict the intent of many of the policies and rules which allow for net gain e.g. for offsetting and compensation.	Remove works such as 'avoid', 'protect' and 'prevent' and replace these with ones that support the intent of the policies and rules to allow for net gain through offsetting and compensation

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Westpower Limited (S547)	S547.246	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity	Amend	To adequately recognise and provide for existing energy activities and infrastructure.	Ensure existing energy activities and infrastructure within ecosystems and areas of indigenous biodiversity are appropriately recognised and provided for.
Buller Conservation Group (S552)	S552.002	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity	Amend	Natural character is used in two ways in this Plan.	Explanation of 'natural character'. The explanations should be in the introductions to firstly the ECO chapter, stating s31(b),(iii), then in the NC chapter, stating s6(a).Or else in the 'Definitions' chapter
Buller Conservation Group (S552)	S552.057	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity	Amend	The RMA, s31(b), (iii) version of natural character needs to be defined in ECO overview	Add explanation consistent with S31(b)(iii) or the RMA <b>the control of any actual or potential effects of the use, development, or protection of land, including for the purpose of the maintenance of indigenous biological diversity</b>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.006	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity	Amend	Forest & Bird recommends that the Wildlands Report should be used as the basis for an immediate regionwide SNA survey.	Direct the use of the Wildlands Report as the basis to immediately progress a consistent region wide SNA assessment.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.009	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity	Amend	The provisions of the ECO chapter do not protect significant habitat of fauna, where that is found in non-indigenous vegetation, because the rules only regulate indigenous vegetation clearance.	Amend the Plan provisions to ensure of protection to significant habitats of indigenous fauna, including from exotic vegetation clearance.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.012	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity	Amend	Relying on consenting to identify and protect SNAs is inadequate given the permitted activity rules which would result in the loss of such biodiversity.	Include a clear explanation in the Introduction to the ECO chapter that SNAs that have not yet been identified are to be given the same protection as those already in Schedule Four. Also make this clear in the policies, and the rule framework.
Royal Forest and Bird Protection Society of New	S560.025	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity	Amend	The ECO chapter (as amended by this submission) sets out what is expected for biodiversity effects management,	All effects on biodiversity must be dealt with in accordance with Chapter Seven WCRPS, which we have submitted should be incorporated into

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Zealand Inc. (Forest & Bird) (S560)					including biodiversity offsetting and compensation. This is in accordance with the clear requirements of the WCRPS, Chapter Seven.	the ECO chapter.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.413	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity	Amend	There is also confusion with terminology in the Plan where neither definition is used, and provisions refer to "areas of significant indigenous vegetation or significant habitats of indigenous fauna" or "significant indigenous biodiversity" or "Significant indigenous biodiversity including Significant Natural Areas".	Add an explanation to the definition or within the ECO chapter overview to the effect that in this Plan, Significant Natural Area is used as a term to mean both mapped and unmapped areas meeting the criteria. For specific reference to mapped areas (i.e., in the Grey District) the wording used in the Plan and Planning maps is 'SNA identified in Schedule Four'.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.415	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity	Amend		Include policy direction in the ECO chapter, and any chapters that regulate mining activities, for Significant Natural Areas to be identified and mapped through an ecological assessment process
Groundswell NZ (S562)	S562.003	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity	Oppose	In taking this action the committee (and councils) have negatively impacted the values they were trying to protect and undermined councils' relationships with their constituents.	Withdraw the immediate legal effect for parts of the plan.
Michael Orchard (S583)	S583.003	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity	Support	I support the Biodiversity principles, and rules	Retain Biodiversity principles and rules
WMS Group (HQ) Limited and WMS Land Co. Limited (S599)	S599.049	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity	Amend	Recognises that vast tracts of land are afforded a greater degree of protection by virtue of being in public conservation land.	Include an additional objective into Ecosystems and Indigenous Biodiversity as follows: <b>When considering resource consent applications which have effects on ecosystems and indigenous biodiversity, have regard to the protection afforded to other similar ecosystems and indigenous biodiversity within public conservation land.</b>

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Tangi Weepu (S630)	S630.003	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity	Amend		Include natural environment values raised in verbal submission
Nicholas Johnston (S14)	S14.004	Ecosystems and Indigenous Biodiversity	Overview	Oppose	I'm contacting you in regards to SNA proposed boundaries and already imposed properties with an SNA, I'm Just wondering why there are two different types of assessing SNA areas 1. privately owned land and 2. government, doc or council owned. Seems to be working in favour for the government claiming more land and not paying a cent.	Clarify why public land is not identified as an SNA.
Katherine Crick (S101)	S101.005	Ecosystems and Indigenous Biodiversity	Overview	Support	The media has reported recently that wildlife populations have declined 70% worldwide since 1970 (WWF, BBC, 13/10/22). ECO objectives in this context are therefore crucial to halt any further decline and degradation to the environment, habitat and indigenous biodiversity.	Retain the stated aims and responsibilities of local councils in the ECO Overview to protect indigenous biodiversity.
West Coast Penguin Trust (S275)	S275.001	Ecosystems and Indigenous Biodiversity	Overview	Amend	ECO - introduction, 5th paragraph. Recommend including reference to the National Policy Statement for Indigenous Biodiversity, which will fall under the RMA and is likely to be gazetted before TTPP is finalised and therefore required to be given effect to under this plan. Recommend extending the paragraph to include a third point to make it clear that habitats of indigenous fauna may include non-native vegetation and are included in Significant Natural Areas,	Add the following wording to the introduction: <b>Under the RMA, the district and regional councils share responsibility for maintaining indigenous biodiversity. This responsibility will be extended by the National Policy Statement for Indigenous Biodiversity, once gazetted.</b> Extend the fifth paragraph as follows <b>Thirdly, it should be noted that habitats of indigenous fauna may comprise some or all non-native vegetation and still fall within Significant Natural Areas, according to criteria set out in the West Coast Regional Policy Statement.</b>

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Westpower Limited (S547)	S547.247	Ecosystems and Indigenous Biodiversity	Overview	Amend	Westpower has a considerable network of energy activities within communities.	Add a new paragraph: <b>There is a considerable network of energy activities and infrastructure, including critical infrastructure, on the West Coast that services the communities spread throughout the region and into neighbouring regions. Such activities have been, and will continue to be, developed and undertaken recognising and taking into account the local conditions. Given the topography and extent of ecosystems and indigenous biodiversity on the West Coast practical management solutions are required to ensure maintenance and enhancement of the supply of renewable energy to, and between, communities for the benefit of those communities and the wider environment from the use and development of renewable energy. The National Policy Statement for Renewable Electricity Generation also recognises the constraints and requirements of such activities including, amongst other matters, being located where the resource is.</b>
Westpower Limited (S547)	S547.248	Ecosystems and Indigenous Biodiversity	Overview	Amend	Clearance in the Coastal Environment or adjacent to waterbodies.	Insert commentary regarding the Coastal Environment provisions under the heading referencing that environment.
Buller Conservation Group (S552)	S552.058	Ecosystems and Indigenous Biodiversity	Overview	Amend	The coastal highway breaks through and fragments any otherwise continuous tract of ECO	Amend Paragraph 2: In a <b>number of</b> many places indigenous ecosystems and habitats ... indigenous vegetation <b>(albeit the majority of that land is mountainous)</b> - compared with 24% nationally. <b>Any activity carried out on public conservation land requires a concession, licence, permit or lease from the Department.</b>

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Buller Conservation Group (S552)	S552.061	Ecosystems and Indigenous Biodiversity	Overview	Amend	Wording and reference around coastal environment needs to be pulled together.	Add to Overview: <b>Where indigenous vegetation clearance is proposed in the coastal environment refer to the Coastal Environment chapter (page reference) of the Plan for the rules around this clearance.</b>
Frida Inta (S553)	S553.002	Ecosystems and Indigenous Biodiversity	Overview	Amend	Natural character is used in two ways in this Plan	Explanation of 'natural character'. The explanations should be in the introductions to firstly the ECO chapter, stating s31(b),(iii), then in the NC chapter, stating s6(a). Or else in the 'Definitions' chapter
Frida Inta (S553)	S553.058	Ecosystems and Indigenous Biodiversity	Overview	Amend	The coastal highway breaks through and fragments any otherwise continuous ECO.	Amend Paragraph 2 & 3: In <b>a number of many</b> places indigenous ecosystems and habitats extend unbroken from the mountains to the sea. 84% of the land area is under the management of the Department of Conservation. In total an estimated 90% of the West Coast/Te Tai o Poutini is covered in indigenous vegetation ( <b>albeit the majority of that land is mountainous</b> ) - compared with 24% nationally. <b>Any activity carried out on public conservation land requires a concession, licence, permit or lease from the Department. Some examples of declining and functionally extinct species (e.g. cobbled skink) need to be highlighted to emphasize that the West Coast is not exempt from such tragedies happening. Wording could be The Cobble Skink, <i>Oligosoma aff. infrapunctatum</i>, found as recently as 2015, predominantly in the Buller, is now functionally extinct. The at risk Shore spurge, <i>Euphorbia glauca</i>, and the nationally endangered Coastal cress, <i>Lepidium flexicule</i>, can be found along the West Coast. Our estuaries are home to the nationally critical dotterel, <i>Charadriidae</i> o.</b>

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						<b>obscure. It is essential that we protect the habitats of these endangered species.</b>
Frida Inta (S553)	S553.061	Ecosystems and Indigenous Biodiversity	Overview	Amend	Wording and reference around coastal environment needs to be pulled together.	Amend <del>Rules</del> to <b>rules</b> . Add to Overview: <b>Where indigenous vegetation clearance is proposed in the coastal environment refer to the Coastal Environment chapter (page reference) of the Plan for the rules around this clearance.</b>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.035	Ecosystems and Indigenous Biodiversity	Overview	Amend	Ensure that its description refers to the fact that not all SNAs are scheduled:	Ecosystems and Indigenous Biodiversity - contains objectives, policies, and rules for managing effects on indigenous biodiversity, including for the assessment and identification of significant indigenous vegetation and significant habitats of indigenous fauna. This chapter contains rules relating to vegetation clearance that apply throughout the district. There are also specific rules that apply within significant natural areas, within outstanding natural features and landscapes and the coastal environment.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.192	Ecosystems and Indigenous Biodiversity	Overview	Amend	There are a number of inaccuracies in the overview which detract from the utility of the introduction to provide a basis upon which to interpret the chapter.	Amend: ...Alongside this, parts of the West Coast/Te Tai o Poutini include the last habitats or strongholds of some native species threatened with extinction. <b>Without identification and protection there is a risk to diversity and intact systems as well as further degradation of already compromised ecosystems. Well-functioning ecosystems provide resilience to climate change and can provide protection to communities from natural hazards.</b>  Under the RMA, the district and regional councils share responsibility for maintaining indigenous biodiversity. Te Tai o Poutini Plan <del>is</del> <b>implements</b>



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						<p><b>councils'</b> responsibility for protecting and maintaining terrestrial (land-based) ecosystems, including the margins of the coast and waterbodies. <del>and</del> The West Coast Regional Council is responsible for protecting and maintaining the non-terrestrial ecosystems (rivers, lakes, wetlands, and the coast below mean high water springs). Poutini Ngāi Tahu also have cultural responsibilities as mana whenua and kaitiaki. The RMA requires Te Tai o Poutini Plan to <b>assist Councils in carrying out their functions with respect to</b> manage indigenous biodiversity in two particular ways. <del>Firstly, the control of any actual or potential effects of the use, development, or protection of land for the purpose of maintaining indigenous biodiversity. Secondly, it is required to recognise and provide for the protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna.</del> <b>Specifically, to recognise and provide for the protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna; and more broadly, for the control of any actual or potential effects of the use, development, or protection of land for the purpose of maintaining indigenous biodiversity. The WCRPS, which this Plan must give effect to, sets out criteria for determining significance and requires that all areas meeting this criteria, whether mapped in the Plan or not, are to be known as Significant Natural Areas, or SNAs.</b></p> <p>Because of the <del>extremely large</del> <b>extensive</b> land areas covered by indigenous vegetation on the West Coast/Te Tai o Poutini, <del>detailed a</del> <b>comprehensive</b> assessment of each piece of vegetation for <b>identification of significance</b></p>

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						<p><b>using the WCRPS Appendix 1 criteria for the purpose of mapping Significant Natural Areas</b> <del>its significance has not yet been undertaken</del> <b>completed.</b></p> <p>In the Grey District, an evaluation process <del>has been underway for</del> <b>was undertaken</b> a number of years ago. <del>This identified, and this has enabled</del> <b>37 Significant Natural Areas previously included in the Grey District Plan. These areas remain identified as SNAs</b> <del>to be identified within the Grey District. The list of these Significant Natural Areas can be found</del> <b>included</b> in Schedule Four and they are also shown on the maps. <b>Where the provisions in this Plan refer to Significant Natural Areas this includes areas which are not yet included as SNA in Schedule Four, that nevertheless meet one or more of the significance criteria. Where there is uncertainty as to whether an area may meet the criteria, or in the absence of an ecological assessment, precaution and protection should be favoured, and a resource consent sought.</b></p> <p>In the Buller and Westland Districts, where Significant Natural Areas have not yet been mapped, <b>and in Grey District for areas outside of mapped SNAs included in Schedule Four,</b> Te Tai o Poutini Plan has general vegetation clearance rules, with an expectation that an assessment against the regionally consistent significance criteria will be undertaken at the time of any resource consent. <b>It is expected that further areas will be identified and mapped as Significant Natural Areas through resource consent processes or Council supported ecological</b></p>

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						assessments and that these will be added to the Plan through subsequent Plan change processes. ...
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.475	Ecosystems and Indigenous Biodiversity	Overview	Support	The WCRPS also has a different term for Policy 11 NZCPS biodiversity which should also be used for consistency in this Plan.	Amend: <b>Indigenous vegetation clearance in the Coastal Environment or adjacent to waterbodies Te Tai o Poutini Plan must also give effect to Policy 11 of the NZCPS 2010 and the WCRPS which include specific provisions for protection of indigenous biological diversity in the coastal environment. For consistency with the WCRPS biodiversity described in Policy 11 of the NZCPS is referred to as "Significant indigenous biological diversity". This chapter includes provisions for protection of this biological diversity within the coastal environment above mean highwater springs as shown on the Planning maps.</b> Where indigenous vegetation clearance is proposed within riparian margins next to rivers, lakes and wetlands refer to the Natural Character and Margins of Waterbodies chapter of the Plan for the Rules around this clearance.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.505	Ecosystems and Indigenous Biodiversity	Overview	Amend		Include a definition of vegetation/indigenous vegetation
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.138	Ecosystems and Indigenous Biodiversity	Overview	Support	The maintenance indigenous ecosystem enables Poutini Ngāi Tahu to continue to undertake their cultural traditions	Retain as notified
Westpower Limited (S547)	S547.249	Ecosystems and Indigenous Biodiversity	Strategic Objectives	Amend	Subsequent amendment	Amend heading: Strategic Objectives <b>and Policies</b>

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Westpower Limited (S547)	S547.250	Ecosystems and Indigenous Biodiversity	Strategic Objectives	Amend	Subsequent amendment	Amend: The Strategic Objectives <b>and Policies</b> are particularly ... and Connections and Resilience Strategic Objectives <b>and Policies</b> are particularly relevant.
Grey District Council (S608)	S608.665	Ecosystems and Indigenous Biodiversity	Strategic Objectives	Support in part	NENV - O1 Reword provision to refer to which specifications of Poutini Ngāi Tahu's cultural and spiritual values.	Reword i.e.: "To recognise and protect the natural character, landscapes and features, ecosystems and indigenous biodiversity that contribute to the West Coast's character and identity and recognise Poutini Ngāi Tahu's cultural and spiritual values."
Grey District Council (S608)	S608.666	Ecosystems and Indigenous Biodiversity	Strategic Objectives	Support	NENV - O3 Support recognised need for infrastructure to sometimes be in significant areas.	Retain
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.136	Ecosystems and Indigenous Biodiversity	Strategic Objectives	Amend	Consistency with the Poutini Ngāi Tahu Strategic section	Include the following wording: .... the Ecosystems and Indigenous Biodiversity Chapter. The Natural Environment, <b>Poutini Ngāi Tahu</b> , Mineral Extraction and Connections and Resilience Strategic Objectives are particularly relevant.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.195	Ecosystems and Indigenous Biodiversity	Wetlands on the West Coast	Amend	It would be helpful to explain that the National Environmental Standards for Freshwater, regulations, include setbacks which are different to those in this Plan, and which may require consent to be sought from the Regional Council.	Amend: <b>Wetlands on the West Coast The National Environmental Standards for Freshwater Management includes regulations for activities within, and within setbacks from, natural wetlands. These activities are managed by the West Coast Regional Council under the NES for Freshwater regulations. It should be noted that the setbacks for activities within those regulations may be different to those set out in this Plan and may require resource consent to be sought from the regional council.</b>

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						The West Coast Regional Council Land and Water Plan identifies ..... <del>They are also subject to regulation by the West Coast Regional Council under the National Environmental Standard for Freshwater Management – which also has regulations around how other wetlands can be managed.</del>
TiGa Minerals and Metals Limited (S493)	S493.045	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity Objectives	Amend	Recognises a greater degree of protection by virtue of being in public conservation land.	Add objective: When considering resource consent applications which have effects on ecosystems and indigenous biodiversity, have regard to the protection afforded to other similar ecosystems and indigenous biodiversity within public conservation land.
Steve Croasdale (S516)	S516.031	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity Objectives	Support		Retain
Buller District Council (S538)	S538.196	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity Objectives	Support	Council supports the objectives for Ecosystems and Indigenous Biodiversity.S	Retain as notified.
Buller Conservation Group (S552)	S552.063	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity Objectives	Amend	Ecosystem services need at least one mention in this Plan.	Add new Objective <b>05 Recognise the ecosystem services that intact SNAs provide for the resilience of both human and indigenous habitat.</b>
Frida Inta (S553)	S553.063	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity Objectives	Amend	Ecosystem services need at least one mention in this Plan.	Add new Objective <b>05 Recognise the ecosystem services that intact SNAs provide for the resilience of both human and indigenous habitat.</b>
Chris & Jan Coll (S558)	S558.085	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity Objectives	Support		Retain

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Geoff Volckman (S563)	S563.020	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity Objectives	Support	We support these objectives.	Retain
Catherine Smart-Simpson (S564)	S564.024	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity Objectives	Support		Retain
Chris J Coll Surveying Limited (S566)	S566.085	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity Objectives	Support		Retain
William McLaughlin (S567)	S567.168	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity Objectives	Support		Retain
Laura Coll McLaughlin (S574)	S574.085	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity Objectives	Support		Retain
Koiterangi Lime Co LTD (S577)	S577.027	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity Objectives	Support	Support these objectives.	Retain
Koiterangi Lime Co LTD (S577)	S577.031	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity Objectives	Support	Support these objectives	Retain
David Ellerm (S581)	S581.024	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity Objectives	Support		Retain
Birchfield Coal Mines Ltd (S601)	S601.032	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity Objectives	Amend	That vast tracts of land are afforded a greater degree of protection by being in public conservation land.	New objective: <b>When considering resource consent applications which have effects on ecosystems and indigenous biodiversity, have regard to the protection afforded to other similar ecosystems and indigenous biodiversity within public conservation</b>

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						land.
Department of Conservation (S602)	S602.064	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity Objectives	Amend	Support the objectives subject to amendments and re-order the objectives so that ECO-O4 is reordered to become ECO-O1 as this objective applies to all indigenous biodiversity.	Re-order the objectives so that ECO-O4 become ECO-O1.
BRM Developments Limited (S603)	S603.021	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity Objectives	Amend	Recognises that vast tracts of land are afforded a greater degree of protection by virtue of being in public conservation land.	Include an additional objective: <b>When considering resource consent applications which have effects on ecosystems and indigenous biodiversity, have regard to the protection afforded to other similar ecosystems and indigenous biodiversity within public conservation land.</b>
Birchfield Ross Mining Limited (S604)	S604.026	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity Objectives	Amend	Recognises that vast tracts of land are afforded a greater degree of protection by virtue of being in public conservation land.	Add new objective: <b>"When considering resource consent applications which have effects on ecosystems and indigenous biodiversity, have regard to the protection afforded to other similar ecosystems and indigenous biodiversity within public conservation land."</b>
Phoenix Minerals Limited (S606)	S606.022	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity Objectives	Amend	Recognise that vast tracts of land are protected public conservation land.	Include an additional objective into Ecosystems and Indigenous Biodiversity as follows: "When considering resource consent applications which have effects on ecosystems and indigenous biodiversity, have regard to the protection afforded to other similar ecosystems and indigenous biodiversity within public conservation land."
Whyte Gold Limited (S607)	S607.021	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity Objectives	Amend	An additional objective is sought to give effect to NENV - O3	Include an additional objective into Ecosystems and Indigenous Biodiversity:: <b>When considering resource consent applications which have effects on ecosystems and indigenous biodiversity, have regard to the protection afforded to other similar ecosystems and indigenous biodiversity</b>

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						<b>within public conservation land.</b>
Grey District Council (S608)	S608.039	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity Objectives	Support	Gives effect to Objectives of the West Coast RPS.	Retain as notified
David Moore (S65)	S65.009	Ecosystems and Indigenous Biodiversity	ECO- O1	Support		Retain
Katherine Crick (S101)	S101.007	Ecosystems and Indigenous Biodiversity	ECO- O1	Support	Fully support the objectives to Identify, protect and maintain indigenous vegetation and habitats as well as maintaining the diversity of ecosystems. Appropriate development or use occurs only where "values of the area can be maintained or enhanced".	Retain Objective ECO-01
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.312	Ecosystems and Indigenous Biodiversity	ECO- O1	Support	We support this objective.	Retain objective.
Laura Garber (S278)	S278.003	Ecosystems and Indigenous Biodiversity	ECO- O1	Support	I support the initiative to identify habitat of native flora and fauna across the West Coast as this will pave the way to further, much needed, protection.	Retain the objective as drafted in the proposed plan.
Te Tumu Paeroa - The office of the Māori Trustee (S440)	S440.022	Ecosystems and Indigenous Biodiversity	ECO- O1	Support in part	The Māori Trustee is generally comfortable with the objectives in the 'Ecosystems and Indigenous Biodiversity' chapter.  However, the Māori Trustee considers that the identification and protection of significant indigenous vegetation and significant habitats of indigenous fauna should be made in conjunction with landowners.	The Māori Trustee considers that the following amendment needs to be made to objective ECO O1.  Amendments O1. To identify and protect, <b>in conjunction with landowners</b> , areas of significant indigenous vegetation and significant habitats of indigenous fauna on the West Coast/Te Tai o Poutini.
Suzanne Hills (S443)	S443.020	Ecosystems and Indigenous Biodiversity	ECO- O1	Amend		Amend to include the words " <b>and map</b> "



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Clare Backes (S444)	S444.003	Ecosystems and Indigenous Biodiversity	ECO- O1	Amend		Need to add in 'and map'.
Waka Kotahi NZ Transport Agency (S450)	S450.079	Ecosystems and Indigenous Biodiversity	ECO- O1	Support	Waka Kotahi supports those areas of significant indigenous vegetation and significant habitats of indigenous fauna in the West Coast/Tai o Poutini should be protected.	Retain as proposed.
Inger Perkins (S462)	S462.011	Ecosystems and Indigenous Biodiversity	ECO- O1	Not Stated	I note that the assessment and creation of Significant Natural Areas in the Grey District was many years ago	Amend the objective to include the review of SNAs in the Grey District.
Inger Perkins (S462)	S462.012	Ecosystems and Indigenous Biodiversity	ECO- O1	Amend	SNAs are needed to provide the protection of under represented ecological areas. SNAs have been required by the RMA since 1991 and Councils need to be identifying SNAs so that they may be protected. An expectation that assessment will be undertaken at the time of any resource consent is inadequate and risks loss of potential SNAs.	Provide for a proactive mechanism for identification of SNAs in the objective.
Buller Conservation Group (S552)	S552.064	Ecosystems and Indigenous Biodiversity	ECO- O1	Amend	This is a direct extract from the Buller District Plan.	To identify and protect areas of significant indigenous vegetation and significant habitats of indigenous fauna <b>and to recognise their importance to the character and quality of the natural and physical environment and to the wellbeing of the people and communities</b> on the West Coast/Te Tai o Poutini
Frida Inta (S553)	S553.064	Ecosystems and Indigenous Biodiversity	ECO- O1	Amend	This is a direct extract from the Buller District Plan.	To identify and protect areas of significant indigenous vegetation and significant habitats of indigenous fauna <b>and to recognise their importance to the character and quality of the natural and physical environment and to the wellbeing of the people and communities</b> on the West Coast/Te Tai o Poutini

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Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.196	Ecosystems and Indigenous Biodiversity	ECO- O1	Amend	To give effect to Objective 7.1 and Policy 7.1.a) of the WCRPS it is necessary for Significant Natural Areas to be mapped. There should be a clear objective to map SNAs within a reasonable timeframe.	To identify and protect areas of significant indigenous vegetation and significant habitats of indigenous fauna on the West Coast/Te Tai o Poutini, <b>including mapping of Significant Natural Areas consistently across all districts and including these areas in Schedule Four by 2025.</b>
Grey District Council (S608)	S608.040	Ecosystems and Indigenous Biodiversity	ECO- O1	Support	Gives effect to Objectives of the West Coast RPS.	Retain as notified
Karamea Lime Company (S614)	S614.040	Ecosystems and Indigenous Biodiversity	ECO- O1	Support		Retain
Peter Langford (S615)	S615.040	Ecosystems and Indigenous Biodiversity	ECO- O1	Support		Retain
Katherine Crick (S101)	S101.008	Ecosystems and Indigenous Biodiversity	ECO- O2	Support	Fully support the objectives to Identify, protect and maintain indigenous vegetation and habitats as well as maintaining the diversity of ecosystems. Appropriate development or use occurs only where "values of the area can be maintained or enhanced".	Retain Objective ECO - 02
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.313	Ecosystems and Indigenous Biodiversity	ECO- O2	Support	We support this objective.	Retain objective.
Lindy Mason (S355)	S355.001	Ecosystems and Indigenous Biodiversity	ECO- O2	Support	The indigenous ecosystems of our country are frequently interspersed with modified ecosystems, but this area , the Coast Road, has substantial corridors Linking forest, wetlands, dune and coastal landscapes. The effect for tourists and locals is the impression of a natural landscape inhabited lightly by residents and businesses. Most businesses here trade on the	support ECO p2, P3, P4, P8

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					appreciation of this combination landscape and have mostly done so with minimal disruption to the overall character.	
Manawa Energy Limited (Manawa Energy) (S438)	S438.075	Ecosystems and Indigenous Biodiversity	ECO- O2	Support in part	Manawa supports provisions for appropriate use within areas of significant indigenous vegetation and significant habitats of indigenous fauna where the values of the area can be maintained or enhanced. It considers however that the focus at an objective level should be simplified to provision for appropriate activities, while the mechanism for doing this can come through the policy.	Amend ECO - P2 as follows: To provide for appropriate subdivision, use and development within areas of significant indigenous vegetation and significant habitats of indigenous fauna <del>where the values of the area can be maintained or enhanced.</del>
Karen Lippiatt (S439)	S439.025	Ecosystems and Indigenous Biodiversity	ECO- O2	Oppose	Remove this Objective. It is self-contradictory. If an area is of significant indigenous vegetation or significant habitat to indigenous fauna, then it's ecosystem and biodiversity value can not be enhanced by turning it into a subdivision.	Delete objective
Clare Backes (S444)	S444.004	Ecosystems and Indigenous Biodiversity	ECO- O2	Oppose	Subdivision is not appropriate within areas of significant indigenous vegetation and significant habitats of indigenous fauna. This objective should not be an objective in the ECO chapter, the obligation is to protect significant areas and maintain indigenous biodiversity.	Delete objective
Waka Kotahi NZ Transport Agency (S450)	S450.080	Ecosystems and Indigenous Biodiversity	ECO- O2	Support	Waka Kotahi supports this objective as it provides for a level of development and use, which could include transport infrastructure, within areas of significant indigenous vegetation if it enhances or maintains it.	Retain as proposed.
Inger Perkins (S462)	S462.013	Ecosystems and Indigenous Biodiversity	ECO- O2	Amend	SNAs are needed to provide the protection of under represented ecological areas. SNAs have been required by the RMA since 1991 and Councils need to be identifying SNAs so	Provide for a proactive mechanism for identification of SNAs in the objective.

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					that they may be protected. An expectation that assessment will be undertaken at the time of any resource consent is inadequate and risks loss of potential SNAs	
New Zealand Coal & Carbon Limited (S472)	S472.013	Ecosystems and Indigenous Biodiversity	ECO- O2	Oppose in part	Provide for mitigation where this is possible.	Insert at end <i>"or if not where adverse effects can be mitigated"</i> .
Horticulture New Zealand (S486)	S486.028	Ecosystems and Indigenous Biodiversity	ECO- O2	Support	HortNZ seeks to ensure that growers are still able to use land for horticulture as an appropriate use.	Retain ECO-O2
Bathurst Resources Limited and BT Mining Limited (S491)	S491.012	Ecosystems and Indigenous Biodiversity	ECO- O2	Amend	Recognising existing lawfully established activities and the special purpose zones.	Amend: To provide for appropriate subdivision, use and development within areas of significant indigenous vegetation and significant habitats of indigenous fauna <b>or within the special purpose Buller Coalfield and Mineral Extraction Zones (BCZ, MINZ)</b> or where the values of the area can be maintained or enhanced.
Bathurst Resources Limited and BT Mining Limited (S491)	S491.013	Ecosystems and Indigenous Biodiversity	ECO- O2	Amend	Effects hierarchy should be considered.	To provide for appropriate subdivision, use and development within areas of significant indigenous vegetation and significant habitats of indigenous fauna or where the values of the area can be maintained or enhanced, <b>offset or compensated for</b> .
TiGa Minerals and Metals Limited (S493)	S493.046	Ecosystems and Indigenous Biodiversity	ECO- O2	Support	Supports mineral extraction where values can be maintained.	Retain as notified.
Federated Farmers of New Zealand (S524)	S524.059	Ecosystems and Indigenous Biodiversity	ECO- O2	Support	Providing for appropriate subdivision use and development within SNA's is supported.	Adopt as notified
Straterra (S536)	S536.046	Ecosystems and Indigenous Biodiversity	ECO- O2	Amend	Provide for mitigation where this is possible.	Insert at end, <i>"or if not where adverse effects can be mitigated"</i> .
Terra Firma Mining Limited (S537)	S537.011	Ecosystems and Indigenous Biodiversity	ECO- O2	Support	TFM supports in principle appropriate subdivision use, and development within areas of significant indigenous vegetation and signification habitats of indigenous	Retain ECO-O2

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					fauna. Section 7 of the RMA requires the protection of these areas, which could be achieved by maintaining or enhancing the values of such areas.	
Westpower Limited (S547)	S547.251	Ecosystems and Indigenous Biodiversity	ECO- O2	Amend	To give effect to the RPS the term appropriate should be amended to sustainable.	Amend: To provide for <b>sustainable</b> subdivision, use and development <b>to enable people and communities to maintain or enhance their economic, social and cultural wellbeing</b> in areas of significant ...
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.197	Ecosystems and Indigenous Biodiversity	ECO- O2	Amend	The obligation is to protect significant and maintain other biodiversity. Subdivision and development within a Significant Natural Area should not be predetermined as "appropriate" to be provided for in this way, which is different to the wording of s6(c). It may be appropriate to consider limited activities where protection is achieved.	Amend ECO - O2: "To <b>only consider</b> provision <del>de</del> for <del>appropriate</del> subdivision, use and development within areas of significant indigenous vegetation and significant habitats of indigenous fauna where the values of the area can be maintained <del>or enhanced</del> <b>and the area is protected.</b> "
Minerals West Coast (S569)	S569.007	Ecosystems and Indigenous Biodiversity	ECO- O2	Support		REtain
WMS Group (HQ) Limited and WMS Land Co. Limited (S599)	S599.050	Ecosystems and Indigenous Biodiversity	ECO- O2	Support	This objective supports mineral extraction where values can be maintained.	retain as notified
Birchfield Coal Mines Ltd (S601)	S601.033	Ecosystems and Indigenous Biodiversity	ECO- O2	Support	Supports mineral extraction where values can be maintained.	Retain as notified.
Department of Conservation (S602)	S602.066	Ecosystems and Indigenous Biodiversity	ECO- O2	Oppose	Amend ECO-O2 to only allow development within areas of significant indigenous vegetation and significant habitats of indigenous fauna where natural values are protected and where appropriate, restored.	Amend: To <del>provide</del> <b>allow</b> for appropriate subdivision, use and development within areas of significant indigenous vegetation and significant habitats of indigenous fauna where the values of the area <del>can be</del> <b>are protected</b> , maintained <del>or</del> <b>and enhanced, and where appropriate restored.</b>

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BRM Developments Limited (S603)	S603.022	Ecosystems and Indigenous Biodiversity	ECO- O2	Support	Supports mineral extraction where values can be maintained.	Retain as notified.
Birchfield Ross Mining Limited (S604)	S604.027	Ecosystems and Indigenous Biodiversity	ECO- O2	Support	Supports mineral extraction where values can be maintained.	Retain as notified.
Phoenix Minerals Limited (S606)	S606.023	Ecosystems and Indigenous Biodiversity	ECO- O2	Support	This objective supports mineral extraction where values can be maintained.	Retain as notified.
Whyte Gold Limited (S607)	S607.022	Ecosystems and Indigenous Biodiversity	ECO- O2	Support	This objective supports mineral extraction where values can be maintained.	Retain as notified.
Grey District Council (S608)	S608.041	Ecosystems and Indigenous Biodiversity	ECO- O2	Support	Gives effect to Objectives of the West Coast RPS.	Retain as notified
Katherine Crick (S101)	S101.009	Ecosystems and Indigenous Biodiversity	ECO- O3	Support	Fully support the objectives to Identify, protect and maintain indigenous vegetation and habitats as well as maintaining the diversity of ecosystems. Appropriate development or use occurs only where "values of the area can be maintained or enhanced".	Retain Objective ECO - O3
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.314	Ecosystems and Indigenous Biodiversity	ECO- O3	Support	We support this objective.	Retain objective.
Dean Mason (S356)	S356.002	Ecosystems and Indigenous Biodiversity	ECO- O3	Support	To support indigenous biodiversity and initiatives to enhance regional vegetation, dunes, forest wetland and natural areas.	support Eco P2,3,4,8.
Te Tumu Paeroa - The office of the Māori Trustee (S440)	S440.023	Ecosystems and Indigenous Biodiversity	ECO- O3	Support in part	The Māori Trustee supports Poutini Ngāi Tahu exercising tino rangatiratanga in relation to the management of areas of significant indigenous vegetation and significant habitats of indigenous fauna where these are located on Poutini Ngāi Tahu and Te Rūnanga o Ngāi Tahu land.  However, the Māori Trustee reiterates	The Māori Trustee considers that 'Poutini Ngāi Tahu land' and 'Te Rūnanga o Ngāi Tahu land' should be defined in the definitions chapter of the Proposed Plan.

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					her point made in paragraph 11 that Poutini Ngāi Tahu land and Te Rūnanga o Ngāi Tahu land need to be defined to reduce ambiguity within the plan.	
Inger Perkins (S462)	S462.014	Ecosystems and Indigenous Biodiversity	ECO- O3	Amend	the approach to significant indigenous vegetation and significant habitats of indigenous fauna would ideally be consistent, no matter the land owner.	Amend the objective so that the approach to significant indigenous biodiversity is consistent regardless of ownership or land tenure
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.198	Ecosystems and Indigenous Biodiversity	ECO- O3	Amend	As noted above, Forest & Bird supports the Plan giving effect to ss6(e), 7(a) and 8. We are concerned that as drafted, this objective may not clearly provide for s6(c).	Amend to ensure that SNAs are protected, for example by the following wording:  "To provide for tino rangatiratanga in relation to <del>management</del> <b>protection of Significant Natural Areas</b> of significant indigenous vegetation and significant habitats of indigenous fauna where these are located on Poutini Ngāi Tahu and Te Rūnanga o Ngāi Tahu land."
Grey District Council (S608)	S608.042	Ecosystems and Indigenous Biodiversity	ECO- O3	Support	Gives effect to Objectives of the West Coast RPS.	Retain as notified
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.137	Ecosystems and Indigenous Biodiversity	ECO- O3	Support	It is important that Poutini Ngāi Tahu and Te Rūnanga o Ngāi Tahu are able to exercise tino rangatiratanga on their land.	Retain as notified
David Moore (S65)	S65.010	Ecosystems and Indigenous Biodiversity	ECO- O4	Support		Retain
Katherine Crick (S101)	S101.010	Ecosystems and Indigenous Biodiversity	ECO- O4	Support	Fully support the objectives to Identify, protect and maintain indigenous vegetation and habitats as well as maintaining the diversity of ecosystems. Appropriate development or use occurs only where "values of the area can be maintained or enhanced".	Retain Objective ECO - O4
Te Mana Ora (Community and Public Health) of the	S190.315	Ecosystems and Indigenous Biodiversity	ECO- O4	Support	We support this objective.	Retain objective.

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NPHS/ Te Whatu Ora (S190)						
West Coast Penguin Trust (S275)	S275.002	Ecosystems and Indigenous Biodiversity	ECO- O4	Amend	ECO-O4: To maintain the range and diversity of ecosystems and indigenous species found on the West Coast/Te Tai o Poutini. Recommend replacing 'maintain' with 'protect, maintain and support the enhancement of'.	Amend to: To <del>maintain</del> <b>protect, maintain and support the enhancement of</b> the range and diversity of ecosystems and indigenous species found on the West Coast/Te Tai o Poutini.
Karen Lippiatt (S439)	S439.026	Ecosystems and Indigenous Biodiversity	ECO- O4	Amend	Totally support the preservation and restoration of indigenous biodiversity.	Amend as follows: To maintain the range, diversity <b>and area</b> of ecosystems and indigenous species found on the West Coast/Te Tai o Poutini
Waka Kotahi NZ Transport Agency (S450)	S450.081	Ecosystems and Indigenous Biodiversity	ECO- O4	Support	Waka Kotahi supports that the range and diversity of ecosystems are to be maintained in the West Coast/Tai o Poutini.	Retain as proposed.
Inger Perkins (S462)	S462.015	Ecosystems and Indigenous Biodiversity	ECO- O4	Amend	to improve protection of indigenous species, this objective should be extended to add 'protect	Amend the objective to read: To <b>protect and</b> maintain the range and diversity of ecosystems and indigenous species found on the West Coast/Tai o Poutini.
TiGa Minerals and Metals Limited (S493)	S493.047	Ecosystems and Indigenous Biodiversity	ECO- O4	Support	This objective supports the maintenance of the range and diversity of ecosystems on the West Coast.	Retain as notified.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.199	Ecosystems and Indigenous Biodiversity	ECO- O4	Amend	The council's obligation is to control land use for the purpose of maintaining indigenous biodiversity across the district, not just the range and diversity. The objective lacks direction to maintain the extent of biodiversity.	Amend: To maintain the range and diversity <b>and extent</b> of ecosystems and indigenous species found on the West Coast/Te Tai o Poutini.
WMS Group (HQ) Limited and WMS Land Co. Limited (S599)	S599.051	Ecosystems and Indigenous Biodiversity	ECO- O4	Support	Supports the maintenance of the range and diversity of ecosystems on the West Coast.	Retain as notified.
Birchfield Coal Mines Ltd (S601)	S601.034	Ecosystems and Indigenous Biodiversity	ECO- O4	Support	This objective supports the maintenance of the range and diversity of ecosystems on the West Coast.	Retain as notified.



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Department of Conservation (S602)	S602.065	Ecosystems and Indigenous Biodiversity	ECO- O4	Amend	Support ECO-04 and amend it to have regard to the maintenance and enhancement of the quality of the environment, and where appropriate restore the range and diversity of ecosystems.	Amend ECO-04: ECO - O41 To maintain, <b>enhance and where appropriate restore</b> the range and diversity of ecosystems and indigenous species found on the West Coast/Te Tai o Poutini
BRM Developments Limited (S603)	S603.023	Ecosystems and Indigenous Biodiversity	ECO- O4	Support	Supports the maintenance of the range and diversity of ecosystems on the West Coast.	Retain as notified.
Birchfield Ross Mining Limited (S604)	S604.028	Ecosystems and Indigenous Biodiversity	ECO- O4	Support	Supports the maintenance of the range and diversity of ecosystems	Retain as notified.
Phoenix Minerals Limited (S606)	S606.024	Ecosystems and Indigenous Biodiversity	ECO- O4	Support	Supports the maintenance of the range and diversity of ecosystems	Retain as notified.
Whyte Gold Limited (S607)	S607.023	Ecosystems and Indigenous Biodiversity	ECO- O4	Support	Supports the maintenance of the range and diversity of ecosystems	Retain as notified.
Grey District Council (S608)	S608.043	Ecosystems and Indigenous Biodiversity	ECO- O4	Support	Gives effect to Objectives of the West Coast RPS.	Retain as notified
Paul Elwell-Sutton (S144)	S144.002	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity Policies	Amend	Leaving identification of SNAs in Westland, to when a resource consent is applied for is completely unacceptable because it relies on local authority capacity and appropriate expertise, as well as the applicant's honesty and/or ability to recognise a potential SNA on their property. The integrity of SNAs in Westland is gravely compromised in the Plan as it stands. In identifying an SNA, its contribution to mitigating climate change must be taken into account. That value must be included in this section of the Plan. Landowners with SNAs on their properties must receive recognition and financial relief for any proven loss of income caused by the SNA.	Throughout the West Coast, SNAs must be mapped through recent (within the past 3 years at most) on the ground assessment by qualified, specialised and independent ecologists, and not through aerial/satellite studies and other remote desktop practices, prior to the Plan becoming operative.

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Westland District Council (S181)	S181.015	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity Policies	Support	Westland District Council will undertake the required SNA review.	retain the polices
Roger Ewer (S316)	S316.003	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity Policies	Support	Indigenous biodiversity is becoming more important as global warming increases. Those of us who live by the sea are concerned about the Coast Road surviving without the threat of large scale sand mining changing the water table.	Retain ECO -P2
Suzanne Hills (S443)	S443.024	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity Policies	Support in part	ECO P3, P4, P5, P6 P7, P8 & P9: set some useful and clear considerations, but the provisions don't go far enough to give effect to the RPS.	Amend the policies to ensure that they give effect to the RPS
Buller Conservation Group (S552)	S552.065	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity Policies	Amend	BCG is concerned that not all significant areas may have been identified.	<b>Add P1.2 to allow for any further sites of significance that may be identified through assessment under Appendix 1 of the WC-RPS.P1.3 Further sites of significance may be identified in the Greymouth area through the assessment criteria in Appendix 1 of the Regional Policy Statement</b>
Buller Conservation Group (S552)	S552.079	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity Policies	Amend	There is not enough protection for the region's terrestrial and freshwater indigenous biodiversity.	<b>Add:g. Effects on the threat status of land environments in category one or two of the Threatened Environments Classification;h. Effects on ecological functioning and the life supporting capacity of air, water, soil and ecosystems;i. Effects on the intrinsic values of ecosystems;j. Effects on recreational values of public land; andk. The matters outlined in Policies ECO - P6 and ECO - P7.</b>
Frida Inta (S553)	S553.065	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity Policies	Amend	Not all significant areas may have been identified.	<b>Add P1.2 to allow for any further sites of significance that may be identified through assessment under Appendix 1 of the WC-RPS.P1.3 Further sites of significance may be identified in the Greymouth area through the assessment criteria in Appendix 1 of the</b>

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						<b>Regional Policy Statement</b>
Frida Inta (S553)	S553.079	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity Policies	Amend	Do not have confidence that ECO will maintain and enhance the region's indigenous biodiversity.	Add: <b>g. Effects on the threat status of land environments in category one or two of the Threatened Environments Classification;h. Effects on ecological functioning and the life supporting capacity of air, water, soil and ecosystems;i. Effects on the intrinsic values of ecosystems;j. Effects on recreational values of public land; andk. The matters outlined in Policies ECO - P6 and ECO - P7.</b>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.008	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity Policies	Amend	WCRPS policies should be replicated in this Plan, rather than reinventing policy direction that creates inconsistencies and confusion with giving effect to that policy direction of the WCRPS for the region.	Replace the ECO chapter policies with those from the WCRPS.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.206	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity Policies	Support	The Plan does not give effect to Chapter 7 WCRPS, in particular policies 2-5.	Insert new policies in the ECO chapter to directly replicate Chapter 7, policies 2-5 WCRPS.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.211	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity Policies	Amend	A new policy is required to give effect to Policy 8 of the WCRPS. This policy can be added directly from the WCRPS or could be included by reference.	Add: <b>Maintain indigenous biological diversity, ecosystems, and habitats in the region by: Recognising that it is more efficient to maintain rather than to restore indigenous biological diversity; Encouraging restoration or enhancement of indigenous biological diversity and/or habitats, where practicable; and Advocating for a co-ordinated and integrated approach to reducing the threat status of indigenous biological diversity.</b>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.482	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity Policies	Amend	Add a new policy to provide direction for activities affecting indigenous biodiversity	<b>Add: Where an assessment carried out by an appropriately qualified expert determines that an area containing indigenous</b>

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Zealand Inc. (Forest & Bird) (S560)			Biodiversity Policies		beyond that which meets the significance criteria in Appendix 1 of the WCRPS.	<b>biodiversity does not meet any of the significance criteria in Appendix 1 of the WCRPS, consider providing for subdivision, use or development in those areas for: activities with no more than minor adverse effects; when activities can avoid, remedy, or mitigate more than minor adverse effects; and Where there are significant residual adverse effects, considering any proposal for indigenous biological diversity offsetting or compensation.</b>
David Ellerm (S581)	S581.025	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity Policies	Support		Retain
Michael Orchard (S583)	S583.005	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity Policies	Amend	I am concerned that Buller and Westland District Councils haven't identified SNAs, and ASK that this plan be so worded to require them to undertake equivalent Surveys and Designations within a short time either using the old criteria as used by Grey District, or the new Government Biodiversity Policy coming out.	Word plan to require Buller and Westland District to undertake SNA surveys within a short timeframe.
Grey District Council (S608)	S608.044	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity Policies	Support		Retain
Jacobus Wiskerke (S95)	S95.003	Ecosystems and Indigenous Biodiversity	ECO - P1	Oppose	Regarding the section ECO - P1, WCRC's position and timeline leaves the WCRC ratepayers exposed to the cost of any legal arguments between central government and WCRC about its interpretation of the RMA requirements. In my opinion any money should be spent on identification of significant natural areas (SNAs), and where relevant compensation to landowners, rather than be spent on the pursuit by WCRC of a	Identify and protect areas with high ecological values as SNA

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					very unlikely exemption from nation-wide RMA requirements. Furthermore, the 'general vegetation clearance rules' referred to on p.172 will provide a lower degree of environmental protection to areas with high ecological values than when being assessed as SNA. Simply speaking: a lot of valuable nature could be damaged or destroyed without requiring the trigger of a resource consent, therefore the proposed TTPP approach of delaying action until a resource consent is required does not take a cautious approach when protecting nature.	
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.316	Ecosystems and Indigenous Biodiversity	ECO - P1	Support	We support this policy.	Retain policy.
Transpower New Zealand Limited (S299)	S299.073	Ecosystems and Indigenous Biodiversity	ECO - P1	Oppose	Transpower understands the reasoning for not identifying areas of significant indigenous biodiversity across the region but has concerns regarding the implications for any future resource consents or designations. When applied to linear infrastructure such as the National Grid, the implications are potentially significant. The approach of not identifying and mapping areas does not give effect to Objective 1 and Policy 1 of Chapter 7 the West Coast RPS, being Objective 1. 1. Identify in regional and district plans, and through the resource consent process, areas of significant indigenous vegetation and significant habitats of indigenous fauna in a regionally consistent manner. Policy 1 1. a) Areas of significant indigenous	Identify areas of significant indigenous biodiversity within the region as directed by the RPS

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					vegetation and significant habitats of indigenous fauna will be identified using the criteria in Appendix 1; they will be known as Significant Natural Areas (SNAs), and will be mapped in the relevant regional plan and district plans. b) Significant wetlands will be identified using the criteria in Appendix 2; they will be known as Significant Natural Areas (SNAs), and will be mapped in the relevant regional plan.	
John Brazil (S360)	S360.093	Ecosystems and Indigenous Biodiversity	ECO - P1	Support in part	I support this policy in principle. I believe that a June 2027 deadline is too ambitious to undertake the work in a way that sufficiently involves landowners.	Amend policy to recognise that a June 2027 deadline is too ambitious to undertake the work in a way that sufficiently involves landowners.
Manawa Energy Limited (Manawa Energy) (S438)	S438.076	Ecosystems and Indigenous Biodiversity	ECO - P1	Oppose	Manawa generally opposes the identification of areas of significant indigenous vegetation and fauna habitat through the resource consent process and considers that it places an unnecessary and unjustified burden on applicants. It will also lead in inconsistency between how different areas and environments are assessed, given the assessments would not be conducted by the same experts, nor any requirements in the pTTPP to follow particular predefined criteria.	Amend ECO - P1 as follows: Identify areas of significant indigenous vegetation and fauna habitat <b>in accordance with the criteria set out in Appendix 1 of the West Coast Regional Policy Statement 2020, and identify these areas in Schedule Four of the Plan.</b> 1. In the Grey District these areas are identified in Schedule Four; 2. In the Buller and Westland Districts: i. The criteria set out in Appendix 1 of the West Coast Regional Policy Statement will be used to assess significance; <del>ii. Areas of significant indigenous vegetation and fauna habitat will be identified through the resource consent process until such time as district wide identification and mapping of significant natural areas is undertaken;</del> ii. Buller and Westland district wide assessment, identification and mapping of significant natural areas will be undertaken by suitably qualified and experienced experts and completed by June 2027; and iii. Identified areas of significant indigenous

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						vegetation and fauna habitat will be added to Schedule Four through a Schedule One Plan Change.
Karen Lippiatt (S439)	S439.027	Ecosystems and Indigenous Biodiversity	ECO - P1	Support	I support this clause for the mapping of areas of significant indigenous vegetation and fauna habitat.	Retain as notified.
Suzanne Hills (S443)	S443.021	Ecosystems and Indigenous Biodiversity	ECO - P1	Amend	Areas of significant indigenous vegetation are present in the Grey District that are not currently in Schedule 4 but likely meet the SNA criteria in Appendix 1 of the RPS.	The Grey District also needs to be subject to ECO P1 i to iv in order for SNAs in Grey continue to be identified and scheduled.
Suzanne Hills (S443)	S443.022	Ecosystems and Indigenous Biodiversity	ECO - P1	Amend	Identifying SNAs in Buller and Westland through the resource consent process is a haphazard and an extremely slow approach. It does not comply with Objective 1 or Policy 1 in section 7 of the RPS and the councils' obligation to protect significant indigenous biodiversity. This is an overly permissive approach, and even though it is pleasing to see a completion timeframe of 2027, there needs to be better control between now and 2027 to prevent further biodiversity loss. It is unclear how the rules intended to restrict activities in SNAs can be effectively applied to potential SNAs yet to be identified. It puts significant ecosystems and biodiversity at risk	Amend to ensure that there is better control of native vegetation clearance between now and 2027 to prevent further biodiversity loss.
Clare Backes (S444)	S444.005	Ecosystems and Indigenous Biodiversity	ECO - P1	Amend	The criteria in the West Coast Regional Policy statement should be applied to areas in the Grey District as well Buller and Westland Districts. Schedule 4 for Grey may not yet be complete. Although there is a finish time for Westland and Buller to complete the mapping by 2027, it is not clear how it will be progressed.	The criteria in the West Coast Regional Policy statement should be applied to areas in the Grey District as well Buller and Westland Districts. Provide information on how the SNA evaluation will be progressed.

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Waka Kotahi NZ Transport Agency (S450)	S450.082	Ecosystems and Indigenous Biodiversity	ECO - P1	Oppose	Waka Kotahi would like to understand the implications and process for requiring the identification of Significant Indigenous Vegetation and Fauna Habitat through the resource consent process in the Buller and Westland Districts. Currently the policy would lead to an onerous process for even minor resource consent applications and could lead to poor outcomes. There is significant risk of having to go through this process as part of a resource consent application, which becomes onerous to applicants. It is recommended that the policy be amended to remove this requirement by having the policy relate to mapping requirements for Council as sites are identified or to remove the policy and include it into the overview as a Council directive.	Amend the policy to remove the requirement on applicants and to clearly identify significant indigenous vegetation and fauna habitat across all three districts in the district plan, including overlays.
Horticulture New Zealand (S486)	S486.029	Ecosystems and Indigenous Biodiversity	ECO - P1	Oppose	HortNZ is concerned that potential growers in Buller and Westland districts would need to undertake an assessment for indigenous biodiversity, rather than the council mapping such areas. This increases uncertainty and cost for potential development of horticulture on the West Coast	Ensure that Buller and Westland districts complete mapping of significant areas of indigenous biodiversity by 2025.  Ensure that the rules enable horticulture to establish on the West Coast and that the identification of significant areas of indigenous biodiversity is not a barrier to such activity.
Michael Snowden (S492)	S492.011	Ecosystems and Indigenous Biodiversity	ECO - P1	Amend	Landowners cannot plan for their business if SNA assessments are done at the time of resource consent,.	Undertake work to identify SNAs in Westland and Buller Districts.
Leonie Avery (S507)	S507.034	Ecosystems and Indigenous Biodiversity	ECO - P1	Support	We support that areas of significant indigenous vegetation and fauna habitat will be identified through the resource consent process until such time as district wide identification and mapping of significant natural areas is undertaken in	Retain as notified.



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					an appropriate and consultative way and that a formal Plan Change occurs after that time.	
Jared Avery (S508)	S508.034	Ecosystems and Indigenous Biodiversity	ECO - P1	Support	We support that areas of significant indigenous vegetation and fauna habitat will be identified through the resource consent process until such time as district wide identification and mapping of significant natural areas is undertaken in an appropriate and consultative way and that a formal Plan Change occurs after that time.	Retain as notified.
Kyle Avery (S509)	S509.034	Ecosystems and Indigenous Biodiversity	ECO - P1	Support	We support that areas of significant indigenous vegetation and fauna habitat will be identified through the resource consent process until such time as district wide identification and mapping of significant natural areas is undertaken in an appropriate and consultative way and that a formal Plan Change occurs after that time.	Retain as notified.
Avery Bros (S510)	S510.034	Ecosystems and Indigenous Biodiversity	ECO - P1	Support	We support that areas of significant indigenous vegetation and fauna habitat will be identified through the resource consent process until such time as district wide identification and mapping of significant natural areas is undertaken in an appropriate and consultative way and that a formal Plan Change occurs after that time.	Retain as notified.
Bradshaw Farms (S511)	S511.034	Ecosystems and Indigenous Biodiversity	ECO - P1	Support	We support that areas of significant indigenous vegetation and fauna habitat will be identified through the resource consent process until such time as district wide identification and mapping of significant natural areas is undertaken in an appropriate and consultative way and that a formal Plan Change occurs after that time.	Retain as notified.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Paul Avery (S512)	S512.034	Ecosystems and Indigenous Biodiversity	ECO - P1	Support	We support that areas of significant indigenous vegetation and fauna habitat will be identified through the resource consent process until such time as district wide identification and mapping of significant natural areas is undertaken in an appropriate and consultative way and that a formal Plan Change occurs after that time.	Retain as notified.
Brett Avery (S513)	S513.034	Ecosystems and Indigenous Biodiversity	ECO - P1	Support	We support that areas of significant indigenous vegetation and fauna habitat will be identified through the resource consent process until such time as district wide identification and mapping of significant natural areas is undertaken in an appropriate and consultative way and that a formal Plan Change occurs after that time.	Retain as notified.
Steve Croasdale (S516)	S516.032	Ecosystems and Indigenous Biodiversity	ECO - P1	Amend	Deadline is too ambitious to undertake the work in a way that sufficiently involves landowners.	Amend point 2. iii. as follows: Buller and Westland district wide assessment, identification and mapping of significant natural areas will be undertaken <del>and completed by June 2027</del> ; and
Federated Farmers of New Zealand (S524)	S524.060	Ecosystems and Indigenous Biodiversity	ECO - P1	Oppose	As addressed above for this chapter on Ecosystems and Indigenous Biodiversity, while this process described will identify the SNAs on the West Coast, we question the methods proposed. For example, is it for the landowner to complete an assessment at time of resource consent? WCFF are concerned with this process where, for example, if the mapping is not completed by June 2027.	That the onus of mapping is a council cost - not a burden covered by the ratepayer. That the plan include exclusions for indigenous vegetation clearance for farm and pasture maintenance.
Buller District Council (S538)	S538.197	Ecosystems and Indigenous Biodiversity	ECO - P1	Support	Council generally supports Policy 1, which requires identification of significant indigenous vegetation and fauna habitat (SNAs) through the resource consent	Retain as notified.  Council seeks assurances from the Regional Council that they will remain responsible for

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					<p>process in accordance with the RPS significance criteria until such time as district wide identification and mapping occurs. This is a continuation of the status quo and Council considers this approach is working well for the District.</p> <p>In principle, Council supports identification and mapping of SNAs by June 2027 as this will provide certainty for Plan users on locations with high biodiversity values. However, there will be substantial costs associated with the mapping exercise and eventual plan change process and Council seeks assurances that these obligations will be met by the Regional Council.</p>	<p>funding and managing the identification, mapping and scheduling process for SNAs.</p>
Westpower Limited (S547)	S547.252	Ecosystems and Indigenous Biodiversity	ECO - P1	Amend	Lack of mapping at this stage affects planning and development.	Clarify proposed timing of the plan change in item iv.
Chris & Jan Coll (S558)	S558.086	Ecosystems and Indigenous Biodiversity	ECO - P1	Amend	June 2027 deadline is too ambitious	Amend 2. iii ... <del>and completed by June 2027.</del>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.200	Ecosystems and Indigenous Biodiversity	ECO - P1	Amend	Amendments are also needed to terminology consistent with the policy direction and the WCRPS definition for "Significant Natural Area, or SNA" as explained in amendments to the ECO chapter overview.	<p>Amend policy to include Grey District SNA mapping to be assessed under the WCRPS criteria.</p> <p>Amend ECO - P1:  "<del>Identify and map areas of sSignificant Natural Areas, by indigenous vegetation and fauna habitat: In the Grey District these areas are identified in Schedule Four; In the Buller and Westland Districts:</del>  i. <del>Using T</del>the criteria set out in Appendix 1 of the West Coast Regional Policy Statement <del>will be used to assess determine</del> significance; ii. <b>In Grey (beyond SNAs included in Schedule Four) and in Buller and Westland, Significant Natural</b> Areas of significant indigenous</p>

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						vegetation and fauna habitat will be identified through the resource consent process <del>until such time as district wide identification and mapping of significant natural areas is undertaken;</del> iii. <b>in Grey (including SNAs currently included in Schedule Four)</b> , Buller and Westland a district wide assessment, identification and mapping of significant natural areas will be undertaken <b>in a regionally consistent manner</b> and completed by June 2025; and iv. <b>the addition of Identified and mapped Significant Natural Areas of significant indigenous vegetation and fauna habitat will be added to Schedule Four through a Plan Change by 2025."</b>
Geoff Volckman (S563)	S563.021	Ecosystems and Indigenous Biodiversity	ECO - P1	Oppose in part	June 2027 deadline is too ambitious to undertake the work.	Delete "and completed by June 2027" from point 2. iii.
Catherine Smart-Simpson (S564)	S564.025	Ecosystems and Indigenous Biodiversity	ECO - P1	Amend	June 2027 deadline is too ambitious to undertake the work	Delete "and completed by June 2027" from point 2. iii.
Chris J Coll Surveying Limited (S566)	S566.086	Ecosystems and Indigenous Biodiversity	ECO - P1	Amend	June 2027 deadline is too ambitious	Amend 2. iii ... <del>and completed by June 2027.</del>
William McLaughlin (S567)	S567.169	Ecosystems and Indigenous Biodiversity	ECO - P1	Amend	June 2027 deadline is too ambitious	Amend 2. iii ... <del>and completed by June 2027.</del>
Laura Coll McLaughlin (S574)	S574.086	Ecosystems and Indigenous Biodiversity	ECO - P1	Amend	June 2027 deadline is too ambitious	Amend 2. iii ... <del>and completed by June 2027.</del>
Koiterangi Lime Co LTD (S577)	S577.028	Ecosystems and Indigenous Biodiversity	ECO - P1	Amend	support this policy in principle	Amend point 2. iii. as follows: Buller and Westland district wide assessment, identification and mapping of significant natural areas will be undertaken <del>and completed by June 2027;</del> and

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Koiterangi Lime Co LTD (S577)	S577.032	Ecosystems and Indigenous Biodiversity	ECO - P1	Amend	We believe that a June 2027 deadline is too ambitious	Amend point 2. iii.: Buller and Westland district wide assessment, identification and mapping of significant natural areas will be undertaken <del>and completed by June 2027</del> ; and
Department of Conservation (S602)	S602.067	Ecosystems and Indigenous Biodiversity	ECO - P1	Amend	Amend ECO-P1 to align with terms used in Section 6(c) of the Act, ensure that the criteria used to assess significance is consistent with the RPS and any future national criteria, and that the criteria is also used to assess significant indigenous vegetation and fauna habitat through the resource consent process or if needed, to confirm compliance with permitted standards. Even with robust mapping, the level of significance of indigenous vegetation and fauna habitat at a site scale is often not known until such time as development is proposed through a resource consent application.	Amend: Identify areas of significant indigenous vegetation and <b>significant habitats of indigenous fauna-habitat as Significant Natural Areas:</b> 1. In the Grey District: i. These areas are identified in Schedule Four; <b>and</b> <b>ii. The criteria set out in Appendix 1 of the West Coast Regional Policy Statement will be used to assess significance through the resource consent process (or to confirm whether or not the area proposed to be cleared is not significant before permitted clearance occurs), until such time as nationally consistent criteria apply through a National Policy Statement or National Environmental Standards. When nationally consistent criteria apply, these will be used to assess significance;</b> 2. In the Buller and Westland Districts: i. The criteria set out in Appendix 1 of the West Coast Regional Policy Statement will be used to assess significance, <b>until such time as nationally consistent criteria apply through a National Policy Statement or National Environmental Standards. When nationally consistent criteria apply, this will be used to assess significance;</b> <b>ii. Significant indigenous vegetation and significant habitats of indigenous fauna</b> <del>Areas of significant indigenous vegetation and fauna habitat will be also identified through the resource consent process (or to confirm whether or not the area proposed to be cleared is not significant before permitted clearance</del>

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						<del>occurs) until such time as district wide identification and mapping of significant natural areas is undertaken;</del> iii. Buller and Westland district wide assessment, identification and mapping of significant natural areas will be undertaken and completed by June 2027; and iv. Identified areas of significant indigenous vegetation and fauna habitat will be added to Schedule Four through a Plan Change.
Grey District Council (S608)	S608.045	Ecosystems and Indigenous Biodiversity	ECO - P1	Support	Gives effect to Policies of the West Coast RPS.	Retain as notified
Avery Brothers (S609)	S609.033	Ecosystems and Indigenous Biodiversity	ECO - P1	Support	Support that areas of significant indigenous vegetation and fauna habitat will be identified through the resource consent process	Retain
Karamea Lime Company (S614)	S614.041	Ecosystems and Indigenous Biodiversity	ECO - P1	Amend	Believe that a June 2027 deadline is too ambitious to undertake the work in a way that sufficiently involves landowners.	Delete " <del>and completed by June 2027</del> " from point 2. iii.
Peter Langford (S615)	S615.041	Ecosystems and Indigenous Biodiversity	ECO - P1	Amend	Believe that a June 2027 deadline is too ambitious to undertake the work in a way that sufficiently involves landowners.	Delete " <del>and completed by June 2027</del> " from point 2. iii.
Katherine Crick (S101)	S101.011	Ecosystems and Indigenous Biodiversity	ECO - P2	Support	This policy does not support the identification of a mineral extraction zone at Barrytown	Support ECO-P2 (e) and apply to mineral extraction at Barrytown.
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.317	Ecosystems and Indigenous Biodiversity	ECO - P2	Support in part	We recommend that ECO-P2 refers to the effects management hierarchy (or mitigation hierarchy) as the approach to best protect and manage adverse effects on biodiversity, as used for example in the National Policy Statement on Freshwater Management (NPS -FM) and the Draft National Policy Statement for Indigenous Biodiversity (NPS-IB), as discussed in NEV-O4. Additionally, we recommend clearer and stronger	Amend ECO-P2 as follows: Allow activities within areas of significant indigenous vegetation or significant habitats of indigenous fauna where: a. This is for a lawfully established activity; or b. It is for a Poutini Ngāi Tahu cultural purpose; or .... d. The activity has a functional need to be located in the area; There is no practicable

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					language for ECO-P2 (d). that is consistent with NPS-FW.	alternative location or every other practicable alternative location would have adverse effects on the natural environment that is greater than, or equal to the proposed location; or e. The activity has no more than minor adverse effects on the significant indigenous vegetation or fauna habitat, <b>and adverse effects are managed appropriately using the effects management hierarchy.</b>
Trevor Hayes (S377)	S377.001	Ecosystems and Indigenous Biodiversity	ECO - P2	Support	Support particularly as relate to threatened coastal forest and wetland habitats	Retain ECO - P2 as notified
Manawa Energy Limited (Manawa Energy) (S438)	S438.077	Ecosystems and Indigenous Biodiversity	ECO - P2	Support in part	Manawa supports provision for appropriate use within areas of significant indigenous vegetation and significant habitats of indigenous fauna where the activity will have no more than minor adverse effects on the significant indigenous vegetation or fauna habitat. Manawa seeks that the benefit of activities should be a criteria in the consideration of allowance of activities to locate in the areas covered by the policy, and further the operational and functional needs of specific activities. Amendments are required to the policy to make it clear that the considerations outlined in ECO - P2 are all exclusive.	Amend ECO - P2 as follows: Allow activities within areas of significant indigenous vegetation or significant habitats of indigenous fauna where: a. ... d. The activity has a functional <b>or operational</b> need to be located in the area; <b>or</b> e. The activity has no more than minor adverse effects on the significant indigenous vegetation or fauna habitat; <b>or f. These activities contribute to New Zealand's social, economic, cultural and environmental wellbeing; or g. These activities contribute to climate change mitigation or adaptation measures.</b>
Te Tumu Paeroa - The office of the Māori Trustee (S440)	S440.024	Ecosystems and Indigenous Biodiversity	ECO - P2	Support in part	The Māori Trustee is generally comfortable with the policies in the 'Ecosystem and Indigenous Biodiversity' chapter.  However, the Māori Trustee considers that ECO P2(b) needs to be amended to provide for Māori landowners. The Māori Trustee	The Māori Trustee considers that the following amendments need to be made to policy ECO P2.  Amendments P2(b). It is for a Poutini Ngāi Tahu <b>or Māori landowner</b> cultural purpose; or

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					administers whenua Māori on behalf of Māori landowners in Te Tai o Poutini and notes that it is likely that not all Māori landowners are registered members of Poutini Ngāi Tahu. The Māori Trustee therefore considers that the cultural activities of Māori landowners needs to be acknowledged alongside the cultural activities of Poutini Ngāi Tahu members in these policies. This will ensure that all Māori landowners are able to undertake activities within areas of significant indigenous vegetation or habitats of indigenous fauna for cultural purposes.	
Silver Fern Farms Limited by its authorised agents Mitchell Daysh Limited (S441)	S441.016	Ecosystems and Indigenous Biodiversity	ECO - P2	Support in part	Silver Fern Farm broadly supports this policy but suggest that sub-clause (d) be amended to include reference to "operational need" in addition to "functional need to be located in the area" so as to not overly restrict activities which are already limited to the areas in which they can take place i.e. Industrial areas.	Amend as follows: ECO - P2 Allow activities within areas of significant indigenous vegetation or significant habitats of indigenous fauna where: [...] d. The activity has a functional need <b>or an operational need</b> to be located in the area
KiwiRail Holdings Limited (S442)	S442.049	Ecosystems and Indigenous Biodiversity	ECO - P2	Amend	KiwiRail supports policy that allows activities within significant habitats where the activity has a functional need to be located in that area. KiwiRail seeks amendment to strengthen this policy and include where an activity has an operational need to be located in a significant area. Rail has an operational need to be located within existing designated rail corridors and KiwiRail seeks recognition of this.	Amend as follows: Allow activities within areas of significant indigenous vegetation or significant habitats of indigenous fauna where: This is for a lawfully established activity; or It is for a Poutini Ngāi Tahu cultural purpose; or This is undertaken on Poutini Ngāi Tahu or Te Rūnanga o Ngāi Tahu land in accordance with an Iwi/Papatipu Rūnanga Management Plan; or The activity has a functional <b>or operational</b> need to be located in the area; The activity has no more than minor adverse effects on the significant indigenous vegetation or fauna habitat.
Suzanne Hills (S443)	S443.023	Ecosystems and Indigenous Biodiversity	ECO - P2	Amend	ECO P2 e: has no more than minor adverse effects on the significant indigenous vegetation or fauna habitat	Amend the policy to refer to "no more than minor <b>cumulative</b> effect"



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					must apply to points a-d; it is not clear that it does because of the inconsistent use of and, or & semi colon. Multiple minor adverse effects could result in a more than minor cumulative effect	
Clare Backes (S444)	S444.006	Ecosystems and Indigenous Biodiversity	ECO - P2	Amend	Poutini Ngāi Tahu cultural purpose is too broad a classification. No activity should be allowed in areas of significant indigenous vegetation or significant habitats of indigenous fauna unless there are no adverse effects on the significant indigenous vegetation or significant habitats of indigenous fauna.	Reword ECO-P2 so that clause e comes first and all other clauses are subordinate to it. Remove "more than minor" from clause e to read: The activity has no adverse effects on the significant indigenous vegetation or fauna habitat.
Waka Kotahi NZ Transport Agency (S450)	S450.083	Ecosystems and Indigenous Biodiversity	ECO - P2	Support in part	Waka Kotahi supports the intent of this policy as it allows activities within areas of significant indigenous vegetation or significant habitats of indigenous fauna where the activity has a functional need to be located in the area. However, there many instances where the state highway has an operational requirement to be located in these areas. It is recommended that the policy be amended to include where the activity has an operational need.	Amend the policy as follows: d. The activity has a functional need <b>or operational need</b> to be located in the area.
New Zealand Coal & Carbon Limited (S472)	S472.014	Ecosystems and Indigenous Biodiversity	ECO - P2	Oppose in part	At item e. insert at end "or where adverse effects can be mitigated".	Provide for mitigation where this is possible.
Bathurst Resources Limited and BT Mining Limited (S491)	S491.014	Ecosystems and Indigenous Biodiversity	ECO - P2	Amend	Should also recognise the intent of the Mineral extraction and Buller Coal fields Zones.	Amend: Allow activities within areas of significant indigenous vegetation or significant habitats of indigenous fauna where: a. This is for a lawfully established activity; or b. It is for a Poutini Ngāi Tahu cultural purpose; or c. This is undertaken on Poutini Ngāi Tahu or Te Rūnanga o Ngāi Tahu land in accordance with an Iwi/Papatipu Rūnanga Management Plan; or d. The activity has a functional need to be

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						located in the area; <b>ore The activity is an anticipated activity within the BCZ or MINZ zone; or</b> f ...
Bathurst Resources Limited and BT Mining Limited (S491)	S491.015	Ecosystems and Indigenous Biodiversity	ECO - P2	Amend	Recognise the functional need requirements.	Amend: Allow activities within areas of significant indigenous vegetation or significant habitats of indigenous fauna where: a. ... <b>The activity has a functional or operational need to be located in that area;</b> <b>or</b> e. The activity has no more than minor adverse effects on the significant indigenous vegetation or fauna habitat.
TiGa Minerals and Metals Limited (S493)	S493.048	Ecosystems and Indigenous Biodiversity	ECO - P2	Amend	Should similarly recognise that activities may also have an operational need to locate.	Amend: Allow activities within areas of significant indigenous vegetation or significant habitats of indigenous fauna where: a. ... d. The activity has a functional <b>or operational</b> need to be located in the area; e. The activity has no more than minor adverse effects on the significant indigenous vegetation or fauna habitat.
Steve Croasdale (S516)	S516.033	Ecosystems and Indigenous Biodiversity	ECO - P2	Amend	The term "functional need" does not go far enough in recognising that some activities are required to operate in certain areas.	Amend point d. as follows: The activity has a functional, <b>technical, operational or locational</b> need to be located in the area;
Aggregate and Quarry Association (S521)	S521.005	Ecosystems and Indigenous Biodiversity	ECO - P2	Support	Adverse effects may not always be minor but where effects can be mitigated	Item d. - add after current wording <b>or where adverse effects can be mitigated.</b>
Federated Farmers of New Zealand (S524)	S524.061	Ecosystems and Indigenous Biodiversity	ECO - P2	Support in part	This recognises lawfully established activities, including existing use rights. This is important for the well -established farming activity that is occurring on the West Coast. There should be explicit provision for clearance of significant indigenous vegetation for farm and pasture maintenance	Amend ECO-P2 by adding: d) add 'or' to the end e) add 'or' to the end f) necessary for farm and pasture maintenance

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Straterra (S536)	S536.047	Ecosystems and Indigenous Biodiversity	ECO - P2	Amend	Provide for mitigation where this is possible. "Functional and operational need", not just "operational need", is consistent with National Policy Statements e.g. NPS Highly Productive Land, and likely to be in NPS Indigenous Biodiversity.	At item e. insert at end, <i>"or where adverse effects can be mitigated".Add, "or operational need"</i> .
Terra Firma Mining Limited (S537)	S537.012	Ecosystems and Indigenous Biodiversity	ECO - P2	Support in part	Policy ECO-P2 d. should also contemplate activities with a locational, operational or technical need to locate in areas of significant indigenous vegetation or fauna habitat. Given the extent of significant indigenous vegetation or fauna habitat on the West Coast, many mining activities will need to occur within these areas. ECO-P2 should contemplate the effects hierarchy of avoid, remedy, mitigate then offset or compensate residual adverse effects. This will allow for creative solutions (biodiversity offsetting or compensation) that can be imposed through resource consent conditions to have a net positive outcome.	Amend ECO-P2 d. to read as follows: The activity has a functional, <b>locational, operational or technical</b> need to be located in the area. Amend ECO-P2 e. to read as follows: Adverse effects of the activity on the significant indigenous vegetation or fauna habitat can be avoided, remedied, <b>mitigated, offset or compensated</b> .
Buller District Council (S538)	S538.198	Ecosystems and Indigenous Biodiversity	ECO - P2	Oppose in part	Council supports Policy 2 which allows activities within SNAs in specified circumstances including where activities have a functional need (noting this extends to locational and operational constrained activities). Council considers that this is appropriate given the potentially extensive nature of SNAs, with the desk top analysis indicating that the vast majority of land with indigenous vegetation cover would potentially be identified as SNAs.  However, it is noted that there appears to be an 'or' missing from clause (d) which	Amend Policy 2 as follows:  Allow activities within areas of significant indigenous vegetation or significant habitats of indigenous fauna where: .... The activity has a functional need to be located in the area; <b>or</b> The activity has no more than minor adverse effects on the significant indigenous vegetation or fauna habitat.

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					suggests clause (e) is a qualifier to the other clauses rather than a standalone clause which is not considered appropriate nor the intent of the policy. Council considers that provision needs to be made for activities within SNAs which have no more than minor adverse effects and this is consistent with Policy 6(b) of the RPS.	
Westpower Limited (S547)	S547.253	Ecosystems and Indigenous Biodiversity	ECO - P2	Amend	Consistency of wording through the plan and with the provisions of the RPS.	Amend d. <b>The technical, locational, functional or operational constraints and requirements for the activity needing to be located in the area.</b>
Buller Conservation Group (S552)	S552.066	Ecosystems and Indigenous Biodiversity	ECO - P2	Amend	There should be NO adverse effects on SNAs.	Amend e. The activity has <del>less no more</del> than minor adverse effects on the significant indigenous vegetation or fauna habitat.
Frida Inta (S553)	S553.066	Ecosystems and Indigenous Biodiversity	ECO - P2	Amend	But really there should be NO adverse effects on SNAs..	Amend e. The activity has <del>less no more</del> than minor adverse effects on the significant indigenous vegetation or fauna habitat.
Chris & Jan Coll (S558)	S558.088	Ecosystems and Indigenous Biodiversity	ECO - P2	Amend	The term "functional need" does not go far enough	Amend point d. as follows: The activity has a functional, <b>technical, operational or locational</b> need to be located in the area;
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.201	Ecosystems and Indigenous Biodiversity	ECO - P2	Amend	While it is Planning practice to generally not include permitted activity status unless there is certainty that adverse effects will be no more than minor, this is not an appropriate policy direction where protection of Significant Natural Areas is to be achieved.	Delete ECO- P2 and replace with Chapter 7 Policy 2 to 6 of the WCRPS.
Royal Forest and Bird Protection Society of New	S560.476	Ecosystems and Indigenous Biodiversity	ECO - P2	Amend	Alternative relief	Amend: <del>Allow</del> <b>make provision for</b> activities within <b>Significant Natural Areas</b> of significant indigenous vegetation or significant habitats of indigenous fauna where:

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Zealand Inc. (Forest & Bird) (S560)						This is for <b>the maintenance, repair, or operation of</b> a lawfully established <b>Structure activity</b> ; or It is for a Poutini Ngāi Tahu cultural purpose; or This is undertaken on Poutini Ngāi Tahu or Te Rūnanga o Ngāi Tahu land in accordance with an Iwi/Papatipu Rūnanga Management Plan; <del>or</del> <b>and adverse effects can be managed to protect the Significant Natural Area in accordance with Chapter 7 Policies 2 to 6 of the WCRPS</b> <del>The activity has a functional need to be located in the area; e. The activity has no more than minor adverse effects on the significant indigenous vegetation or fauna habitat.</del>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.477	Ecosystems and Indigenous Biodiversity	ECO - P2	Amend	We have added d. to address the overarching biodiversity protection concern for all the activities that this policy covers. We are open to another method of ensuring SNAs are protected.	Include from clause d. the consideration for activities that have "a functional need to be located in the area" within P7.
Geoff Volckman (S563)	S563.022	Ecosystems and Indigenous Biodiversity	ECO - P2	Oppose in part	The term "functional need" does not go far enough.	Amend d. The activity has a functional, <b>technical, operational or locational</b> need to be located in the area;
Catherine Smart-Simpson (S564)	S564.026	Ecosystems and Indigenous Biodiversity	ECO - P2	Amend	functional need" does not go far enough	Amend point d. The activity has a functional, <b>technical, operational or locational</b> need to be located in the area;
Chris J Coll Surveying Limited (S566)	S566.088	Ecosystems and Indigenous Biodiversity	ECO - P2	Amend	The term "functional need" does not go far enough	Amend point d. as follows: The activity has a functional, <b>technical, operational or locational</b> need to be located in the area;
William McLaughlin (S567)	S567.170	Ecosystems and Indigenous Biodiversity	ECO - P2	Amend	The term "functional need" does not go far enough	Amend point d. as follows: The activity has a functional, <b>technical, operational or locational</b> need to be located in

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						the area;
Minerals West Coast (S569)	S569.006	Ecosystems and Indigenous Biodiversity	ECO - P2	Oppose	This provision is unworkable for mining and quarrying.	Delete
Laura Coll McLaughlin (S574)	S574.088	Ecosystems and Indigenous Biodiversity	ECO - P2	Amend	The term "functional need" does not go far enough	Amend point d. as follows: The activity has a functional, <b>technical, operational or locational</b> need to be located in the area;
Koiterangi Lime Co LTD (S577)	S577.029	Ecosystems and Indigenous Biodiversity	ECO - P2	Amend	functional need" does not go far enough	Amend point d. as follows: The activity has a functional, <b>technical, operational or locational</b> need to be located in the area;
Koiterangi Lime Co LTD (S577)	S577.033	Ecosystems and Indigenous Biodiversity	ECO - P2	Amend	functional need" does not go far enough	Amend point d.: The activity has a functional, <b>technical, operational or locational</b> need to be located in the area;
WMS Group (HQ) Limited and WMS Land Co. Limited (S599)	S599.052	Ecosystems and Indigenous Biodiversity	ECO - P2	Amend	Should recognise operational need to be located within areas of significant indigenous vegetation or habitats of fauna	Amend ECO - P2 as follows: Allow activities within areas of significant indigenous vegetation or significant habitats of indigenous fauna where:  a. This is for a lawfully established activity; or  b. It is for a Poutini Ngāi Tahu cultural purpose; or c. This is undertaken on Poutini Ngāi Tahu or Te Rūnanga o Ngāi Tahu land in accordance with an Iwi/Papatipu Rūnanga Management Plan; or d. The activity has a functional <b>or operational</b> need to be located in the area; e. The activity has no more than minor adverse effects on the significant indigenous vegetation or

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						fauna habitat.
Birchfield Coal Mines Ltd (S601)	S601.035	Ecosystems and Indigenous Biodiversity	ECO - P2	Amend	Should similarly recognise that activities may also have an operational need to locate	Amend: Allow activities within areas of significant indigenous vegetation or significant habitats of indigenous fauna where: a. ... d. The activity has a functional <b>or operational</b> need to be located in the area; e. ...
Department of Conservation (S602)	S602.068	Ecosystems and Indigenous Biodiversity	ECO - P2	Amend	Amend ECO-P2 to better manage adverse cumulative effects from lawfully established activities within areas of significant indigenous vegetation or significant habitats of indigenous fauna, and apply the effects management hierarchy to appropriately manage adverse effects. Activities which have a functional need to be located within areas of significant indigenous vegetation or significant habitats of indigenous fauna are already appropriately provided for in other chapters of the Plan (e.g. Infrastructure).	a. Amend: Allow activities within areas of significant indigenous vegetation or significant habitats of indigenous fauna where: a. This is for a lawfully established activity <b>and adverse effects are no greater in intensity, scale, or character over time than at the operative date, and do not result in the loss of extent or degradation of ecological integrity</b> ; or b. It is for a Poutini Ngāi Tahu cultural purpose; or c. This is undertaken on Poutini Ngāi Tahu or Te Rūnanga o Ngāi Tahu land in accordance with an Iwi/Papatipu Rūnanga Management Plan; <del>or and</del> . <del>The activity has a functional need to be located in the area;</del> <b>e. The adverse effects of the activity has no more than minor adverse effects on the significant indigenous vegetation or fauna habitat are managed in accordance with the effects management hierarchy.</b>
BRM Developments Limited (S603)	S603.024	Ecosystems and Indigenous Biodiversity	ECO - P2	Amend	Should similarly recognise that activities may also have an operational need to locate	Amend ECO - P2 as follows: "Allow activities within areas of significant indigenous vegetation or significant habitats of indigenous fauna where: a. This is for a lawfully established activity; or b. It is for a Poutini Ngāi Tahu cultural purpose; or c. This is undertaken on Poutini Ngāi Tahu or Te Rūnanga o Ngāi Tahu land in accordance with an Iwi/Papatipu Rūnanga Management Plan; or d. The activity

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						has a functional <b>or operational</b> need to be located in the area; e. The activity has no more than minor adverse effects on the significant indigenous vegetation or fauna habitat."
Birchfield Ross Mining Limited (S604)	S604.029	Ecosystems and Indigenous Biodiversity	ECO - P2	Amend	Recognises that some activities have a functional need to be located	Amend ECO - P2 as follows: Allow activities within areas of significant indigenous vegetation or significant habitats of indigenous fauna where: a. ... d. The activity has a functional <b>or operational</b> need to be located in the area; e. ...
Phoenix Minerals Limited (S606)	S606.025	Ecosystems and Indigenous Biodiversity	ECO - P2	Amend	Recognise that activities may also have an operational need to locate	Amend ECO - P2 as follows: "Allow activities within areas of significant indigenous vegetation or significant habitats of indigenous fauna where: a. This is for a lawfully established activity; or b. It is for a Poutini Ngāi Tahu cultural purpose; or c. This is undertaken on Poutini Ngāi Tahu or Te Rūnanga o Ngāi Tahu land in accordance with an Iwi/Papatipu Rūnanga Management Plan; or d. The activity has a functional <b>or operational</b> need to be located in the area; e. The activity has no more than minor adverse effects on the significant indigenous vegetation or fauna habitat."
Whyte Gold Limited (S607)	S607.024	Ecosystems and Indigenous Biodiversity	ECO - P2	Amend	Recognises that some activities have a functional need to be located within areas of significant indigenous vegetation or habitats of fauna	Amend ECO - P2 as follows: Allow activities within areas of significant indigenous vegetation or significant habitats of indigenous fauna where: a. This is for a lawfully established activity; or b. It is for a Poutini Ngāi Tahu cultural purpose; or c. This is undertaken on Poutini Ngāi Tahu or Te Rūnanga o Ngāi Tahu land in accordance with an Iwi/Papatipu Rūnanga Management Plan; or d. The activity has a functional <b>or operational</b> need to be located in the area; e. The activity has no more than minor adverse effects on the significant indigenous



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						vegetation or fauna habitat."
Grey District Council (S608)	S608.046	Ecosystems and Indigenous Biodiversity	ECO - P2	Support	Gives effect to Policies of the West Coast RPS.	Retain as notified
Grey District Council (S608)	S608.628	Ecosystems and Indigenous Biodiversity	ECO - P2	Support in part	The intent of this policy is supported as it allows activities within areas of significant indigenous vegetation or significant habitats of indigenous fauna where the activity has a functional need to be located in the area. It is recommended that the policy be amended to include where the activity has an operational need.	Amend the policy The activity has an operational and functional need to be located in the area.
Karamea Lime Company (S614)	S614.042	Ecosystems and Indigenous Biodiversity	ECO - P2	Amend	The term "functional need" does not go far enough in recognising that some activities are required to operate in certain areas	Amend point d. as follows: The activity has a functional, <b>technical, operational or locational</b> need to be located in the area;
Peter Langford (S615)	S615.042	Ecosystems and Indigenous Biodiversity	ECO - P2	Amend	The term "functional need" does not go far enough in recognising that some activities are required to operate in certain areas	Amend point d. as follows: The activity has a functional, <b>technical, operational or locational</b> need to be located in the area;
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.139	Ecosystems and Indigenous Biodiversity	ECO - P2	Amend	It is important that Poutini Ngāi Tahu and Te Rūnanga o Ngāi Tahu are able to undertake tino rangatiratanga and that cultural purpose activities are enabled	Retain as notified with the following amendment: ... b. It is for a Poutini Ngāi Tahu <b>activities</b> <del>cultural purpose</del>
David Moore (S65)	S65.011	Ecosystems and Indigenous Biodiversity	ECO - P3	Support		Retain
Katherine Crick (S101)	S101.012	Ecosystems and Indigenous Biodiversity	ECO - P3	Support	This policy does not support the identification of a mineral extraction zone at Barrytown	Retain ECO-P3 (b) & (e) and apply to mineral extraction activities at Barrytown
Te Mana Ora (Community and Public Health) of the	S190.318	Ecosystems and Indigenous Biodiversity	ECO - P3	Support	We support this policy.	Retain policy.

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NPHS/ Te Whatu Ora (S190)						
West Coast Penguin Trust (S275)	S275.003	Ecosystems and Indigenous Biodiversity	ECO - P3	Amend	ECO-P3: Encourage the protection, enhancement and restoration of significant indigenous biodiversity by: 2022 09 West Coast Penguin Trust - Submission - Proposed TTPP 2 Before "...by:", insert 'and the protection of indigenous fauna habitat', so that where non- indigenous vegetation provides habitat, for example for penguins or skinks, the policy applies.	Amend to before "...by:", insert ' <b>and the protection of indigenous fauna habitat</b> ',
Laura Garber (S278)	S278.002	Ecosystems and Indigenous Biodiversity	ECO - P3	Support	It is in particular the support of communities as well as landowners to regenerate and/ or protect land on behalf of the council that I find important. Working bees are a great way to bring people together. There should be incentives for people who want to regenerate their land by planting natives and providing habitat for native fauna. I fully support this provision and hope that this will be an approach the council will take at a larger level	Retain the policy is written in the proposed Plan.
Roger Ewer (S316)	S316.004	Ecosystems and Indigenous Biodiversity	ECO - P3	Support		Retain ECO - P3 (b) & (e)
Trevor Hayes (S377)	S377.002	Ecosystems and Indigenous Biodiversity	ECO - P3	Support	Support particularly as relate to threatened coastal forest and wetland habitats	Retain ECO - P3 (b) and (e) as notified
Te Tumu Paeroa - The office of the Māori Trustee (S440)	S440.025	Ecosystems and Indigenous Biodiversity	ECO - P3	Support in part	The Māori Trustee considers that ECO P3(d) needs to be amended to provide for Māori landowners. The Māori Trustee administers whenua Māori on behalf of Māori landowners in Te Tai o Poutini and notes that it is likely that not all Māori landowners are registered members of Poutini Ngāi Tahu. The Māori Trustee therefore believes that Māori landowners	The Māori Trustee considers that the following amendment needs to be made to policy ECO P3.  Amendments P3(d). Supporting opportunities for Poutini Ngāi Tahu <b>and Māori landowners, where appropriate</b> , to exercise their cultural rights and responsibilities as mana whenua and kaitiaki in

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					should be provided for, alongside Poutini Ngāi Tahu, within this policy. This will ensure that all Māori landowners are able to exercise their cultural rights and responsibilities with regards to protecting, enhancing and restoring significant indigenous biodiversity.	restoring, protecting and enhancing areas of significant indigenous biodiversity; and
TiGa Minerals and Metals Limited (S493)	S493.049	Ecosystems and Indigenous Biodiversity	ECO - P3	Support	Minerals extraction activities often provide the ability for restoration and rehabilitation.	Retain subsections b and c as notified.
Leonie Avery (S507)	S507.035	Ecosystems and Indigenous Biodiversity	ECO - P3	Support	We support this policy.	Retain as notified.
Jared Avery (S508)	S508.035	Ecosystems and Indigenous Biodiversity	ECO - P3	Support	We support this policy.	Retain as notified.
Kyle Avery (S509)	S509.035	Ecosystems and Indigenous Biodiversity	ECO - P3	Support	We support this policy.	Retain as notified.
Avery Bros (S510)	S510.035	Ecosystems and Indigenous Biodiversity	ECO - P3	Support	We support this policy.	Retain as notified.
Bradshaw Farms (S511)	S511.035	Ecosystems and Indigenous Biodiversity	ECO - P3	Support	We support this policy.	Retain as notified.
Paul Avery (S512)	S512.035	Ecosystems and Indigenous Biodiversity	ECO - P3	Support	We support this policy.	Retain as notified.
Brett Avery (S513)	S513.035	Ecosystems and Indigenous Biodiversity	ECO - P3	Support	We support this policy.	Retain as notified.
Steve Croasdale (S516)	S516.034	Ecosystems and Indigenous Biodiversity	ECO - P3	Support		Retain
Federated Farmers of New Zealand (S524)	S524.062	Ecosystems and Indigenous Biodiversity	ECO - P3	Support in part	More information is required with regard to a - "allowing additional subdivision rights". What does this mean and what potential effects on the environment will occur following such additional rights.	Amend ECO-P3 to include what additional subdivisions rights will be provided for.

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Neil Mouat (S535)	S535.010	Ecosystems and Indigenous Biodiversity	ECO - P3	Support	We support this policy.	Retain as notified.
Buller District Council (S538)	S538.199	Ecosystems and Indigenous Biodiversity	ECO - P3	Support	Council supports these policies	Retain as notified.
Buller Conservation Group (S552)	S552.067	Ecosystems and Indigenous Biodiversity	ECO - P3	Amend	s31 requires all indigenous biodiversity to be maintained. Less ambiguous wording.	Encourage the protection, enhancement and restoration of significant indigenous biodiversity <b>and natural indigenous character</b> by... <b>a. For subdivisions where legal protection exists over areas of significant indigenous vegetation or significant habitat of indigenous fauna additional subdivision rights may be granted</b>
Frida Inta (S553)	S553.067	Ecosystems and Indigenous Biodiversity	ECO - P3	Amend	s31 requires all indigenous biodiversity to be maintained.	Encourage the protection, enhancement and restoration of significant indigenous biodiversity <b>and natural indigenous character</b> by... <b>a. For subdivisions where legal protection exists over areas of significant indigenous vegetation or significant habitat of indigenous fauna additional subdivision rights may be granted</b>
Chris & Jan Coll (S558)	S558.089	Ecosystems and Indigenous Biodiversity	ECO - P3	Support		Retain
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.202	Ecosystems and Indigenous Biodiversity	ECO - P3	Amend	Clause a. of ECO-P3 would not necessarily achieve the obligation required under the RMA to protect SNAs. Additional housing next to SNAs also brings with it potential for increased adverse effects. the term enhancement is often used in the context of biodiversity offsets and compensation which is not appropriate here. Protection and restoration are appropriate considerations for all subdivision, not just additional lots.	Amend: Encourage the protection, <del>enhancement</del> , and restoration of significant indigenous biodiversity <del>by</del> <b>when:</b> a. <del>Allowing</del> <b>considering</b> additional subdivision rights if an area of significant indigenous vegetation or significant habitat of indigenous fauna within the same property is legally protected as part of the subdivision; <b>x. considering subdivision proposal proposals of land that includes or lies adjacent to a Significant Natural Area;</b> b. Promoting the creation of connections and

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						ecological corridors between <b>Significant Natural Areas</b> of significant indigenous biodiversity; Promoting the use of eco-sourced species from the relevant ecological district; Supporting opportunities for Poutini Ngāi Tahu to exercise their cultural rights and responsibilities as mana whenua and kaitiaki in restoring, protecting, and enhancing <b>Significant Natural Areas</b> of significant indigenous biodiversity; and e. Supporting initiatives by landowners, community groups and others to protect, restore and maintain <b>Significant Natural Areas</b> of significant indigenous biodiversity.
Catherine Smart-Simpson (S564)	S564.027	Ecosystems and Indigenous Biodiversity	ECO - P3	Support		Retain
Chris J Coll Surveying Limited (S566)	S566.089	Ecosystems and Indigenous Biodiversity	ECO - P3	Support		Retain
William McLaughlin (S567)	S567.171	Ecosystems and Indigenous Biodiversity	ECO - P3	Support		Retain
Laura Coll McLaughlin (S574)	S574.089	Ecosystems and Indigenous Biodiversity	ECO - P3	Support		Retain
Koiterangi Lime Co LTD (S577)	S577.034	Ecosystems and Indigenous Biodiversity	ECO - P3	Support		Retain
WMS Group (HQ) Limited and WMS Land Co. Limited (S599)	S599.053	Ecosystems and Indigenous Biodiversity	ECO - P3	Amend	Subsections b and c are supported. Minerals extraction activities often provide the ability for restoration and rehabilitation of ecological corridors.	Retain subsections b and c as notified.
Birchfield Coal Mines Ltd (S601)	S601.036	Ecosystems and Indigenous Biodiversity	ECO - P3	Support	Subsections b and c are supported. Minerals extraction activities often provide the ability for restoration and rehabilitation of ecological corridors.	Retain subsections b and c as notified.

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Department of Conservation (S602)	S602.069	Ecosystems and Indigenous Biodiversity	ECO - P3	Amend	Amend ECO-P3 to enable any measures to protect, enhance and restore biodiversity to be considered when applying the policy, and biosecurity programmes to manage plant and predator pests.	Amend: Encourage the protection, enhancement and restoration of significant indigenous biodiversity by: <ul style="list-style-type: none"> <li>a. Allowing additional subdivision rights if an area of significant indigenous vegetation or significant habitat of indigenous fauna within the same property is legally protected as part of the subdivision;</li> <li>b. Promoting the creation of connections and ecological corridors between areas of significant indigenous biodiversity;</li> <li>c. Promoting the use of eco-sourced species from the relevant ecological district;</li> <li>d. Supporting opportunities for Poutini Ngāi Tahu to exercise their cultural rights and responsibilities as mana whenua and kaitiaki in restoring, protecting and enhancing areas of significant indigenous biodiversity; <del>and</del></li> <li>e. Supporting initiatives by landowners, community groups and others to protect, restore and maintain areas of significant indigenous biodiversity-;</li> <li><b>f. Site and landscape scale biosecurity programmes to manage plant and animal pests; and</b></li> <li><b>e. Any other measures to protect, enhance and restore biodiversity.</b></li> </ul>
BRM Developments Limited (S603)	S603.025	Ecosystems and Indigenous Biodiversity	ECO - P3	Support	Minerals extraction activities often provide the ability for restoration and rehabilitation of ecological corridors.	Retain subsections b and c as notified.
Birchfield Ross Mining Limited (S604)	S604.030	Ecosystems and Indigenous Biodiversity	ECO - P3	Support	Provide the ability for restoration and rehabilitation of ecological corridors.	Retain subsections b and c as notified.
Phoenix Minerals Limited (S606)	S606.026	Ecosystems and Indigenous Biodiversity	ECO - P3	Support	Minerals extraction activities often provide the ability for restoration and rehabilitation	Retain subsections b and c as notified.
Whyte Gold Limited (S607)	S607.025	Ecosystems and Indigenous Biodiversity	ECO - P3	Support	Subsections b and c are supported, provide the restoration and rehabilitation of ecological corridors.	Retain subsections b and c as notified.

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Grey District Council (S608)	S608.047	Ecosystems and Indigenous Biodiversity	ECO - P3	Support	Gives effect to Policies of the West Coast RPS.	Retain as notified
Avery Brothers (S609)	S609.034	Ecosystems and Indigenous Biodiversity	ECO - P3	Support	We support this policy.	REtain
Karamea Lime Company (S614)	S614.043	Ecosystems and Indigenous Biodiversity	ECO - P3	Support		Retain
Peter Langford (S615)	S615.043	Ecosystems and Indigenous Biodiversity	ECO - P3	Support		Retain
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.140	Ecosystems and Indigenous Biodiversity	ECO - P3	Support	Connections and ecological corridors are important to support indigenous biodiversity.	Retain as notified
Geoff Volckman (S563)	S563.0170	Ecosystems and Indigenous Biodiversity	ECO - P3	Support	We support this policy.	Retain
David Moore (S65)	S65.012	Ecosystems and Indigenous Biodiversity	ECO - P4	Support		Retain
Katherine Crick (S101)	S101.013	Ecosystems and Indigenous Biodiversity	ECO - P4	Support	This policy does not support the identification of a mineral extraction zone at Barrytown	Retain ECO-P4 and apply to any potential large-scale HMC mining ventures proposed for Barrytown.
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.319	Ecosystems and Indigenous Biodiversity	ECO - P4	Support	We support this policy.	Retain policy.
Laura Garber (S278)	S278.005	Ecosystems and Indigenous Biodiversity	ECO - P4	Support	The growing, future population on the West Coast will need income sources that work in harmony with the environment. This does not mean that nature should become a commodity rather than an intact environment will	Retain the policy and provide for eco tourism activities that complement and enhance the native flora and fauna of significance

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					mean reliable and sustainable forms of income for a thriving community	
Roger Ewer (S316)	S316.005	Ecosystems and Indigenous Biodiversity	ECO - P4	Support		Retain ECO - P4
Trevor Hayes (S377)	S377.003	Ecosystems and Indigenous Biodiversity	ECO - P4	Support	Support particularly as relate to threatened coastal forest and wetland habitats	Retain ECO -P4 as notified.
Leonie Avery (S507)	S507.036	Ecosystems and Indigenous Biodiversity	ECO - P4	Support	We support this policy.	Retain as notified.
Jared Avery (S508)	S508.036	Ecosystems and Indigenous Biodiversity	ECO - P4	Support	We support this policy.	Retain as notified.
Kyle Avery (S509)	S509.036	Ecosystems and Indigenous Biodiversity	ECO - P4	Support	We support this policy.	Retain as notified.
Avery Bros (S510)	S510.036	Ecosystems and Indigenous Biodiversity	ECO - P4	Support	We support this policy.	Retain as notified.
Bradshaw Farms (S511)	S511.036	Ecosystems and Indigenous Biodiversity	ECO - P4	Support	We support this policy.	Retain as notified.
Paul Avery (S512)	S512.036	Ecosystems and Indigenous Biodiversity	ECO - P4	Support	We support this policy.	Retain as notified.
Brett Avery (S513)	S513.036	Ecosystems and Indigenous Biodiversity	ECO - P4	Support	We support this policy.	Retain as notified.
Neil Mouat (S535)	S535.011	Ecosystems and Indigenous Biodiversity	ECO - P4	Support	We support this policy.	Retain as notified.
Buller District Council (S538)	S538.200	Ecosystems and Indigenous Biodiversity	ECO - P4	Support	Council supports these policies	Retain as notified.
Buller Conservation Group (S552)	S552.068	Ecosystems and Indigenous Biodiversity	ECO - P4	Oppose	BCG struggles to understand how eco-tourism could enhance the values of SNAs.	Delete P4



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Frida Inta (S553)	S553.068	Ecosystems and Indigenous Biodiversity	ECO - P4	Oppose	Struggle to understand how eco-tourism could enhance the values of SNAs.	Delete P4
Chris & Jan Coll (S558)	S558.090	Ecosystems and Indigenous Biodiversity	ECO - P4	Support		Retain
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.203	Ecosystems and Indigenous Biodiversity	ECO - P4	Amend	While we generally agree that eco-tourism that complements protection is better than that which does not, it is not clear what "complement" means, and this could be subjective.	Amend ECO-P4  "Consider providing for eco-tourism activities that: <del>complement the</del> <b>protection Significant Natural Areas in accordance with Chapter 7, Policies 2 to 6 of the WCRPS</b> <del>en; or and</del> <b>enhancement of areas of significant indigenous biodiversity; vegetation or significant habitats of indigenous fauna;</b> and contribute to the vitality and resilience of the economy and wellbeing of the community.
Chris J Coll Surveying Limited (S566)	S566.090	Ecosystems and Indigenous Biodiversity	ECO - P4	Support		Retain
William McLaughlin (S567)	S567.172	Ecosystems and Indigenous Biodiversity	ECO - P4	Support		Retain
Laura Coll McLaughlin (S574)	S574.090	Ecosystems and Indigenous Biodiversity	ECO - P4	Support		Retain
Grey District Council (S608)	S608.048	Ecosystems and Indigenous Biodiversity	ECO - P4	Support	Gives effect to Policies of the West Coast RPS.	Retain as notified
Avery Brothers (S609)	S609.035	Ecosystems and Indigenous Biodiversity	ECO - P4	Support	We support this policy.	REtain
Te Mana Ora (Community and Public Health) of the	S190.320	Ecosystems and Indigenous Biodiversity	ECO - P5	Support	We support this policy.	Retain policy.

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NPWS/ Te Whatu Ora (S190)						
New Zealand Coal & Carbon Limited (S472)	S472.020	Ecosystems and Indigenous Biodiversity	ECO - P5	Support in part	Support in part. Support e.	Retain e. as notified.
Buller District Council (S538)	S538.201	Ecosystems and Indigenous Biodiversity	ECO - P5	Support	Council supports these policies	Retain as notified.
Buller Conservation Group (S552)	S552.069	Ecosystems and Indigenous Biodiversity	ECO - P5	Amend	Minimize' is not quantitative enough. Any significant (more than minor) change to an SNA needs scrutiny.	Enable the use of Māori Purpose Zoned land within areas of indigenous vegetation and indigenous fauna habitat, where land use and subdivision is consistent with tikanga and mātauranga Māori and <b>ensures less than minor</b> <del>minimises</del> adverse effects on any significant values of the vegetation or fauna habitat
Frida Inta (S553)	S553.069	Ecosystems and Indigenous Biodiversity	ECO - P5	Amend	Any significant (more than minor) change to an SNA needs scrutiny.	Enable the use of Māori Purpose Zoned land within areas of indigenous vegetation and indigenous fauna habitat, where land use and subdivision is consistent with tikanga and mātauranga Māori and <b>ensures less than minor</b> <del>minimises</del> adverse effects on any significant values of the vegetation or fauna habitat
Chris & Jan Coll (S558)	S558.091	Ecosystems and Indigenous Biodiversity	ECO - P5	Support		Retain
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.204	Ecosystems and Indigenous Biodiversity	ECO - P5	Amend	There is some uncertainty in the policy as to what "minimise" will involve and what "significant values" are and whether protection of SNAs will be achieved.	Amend: Enable the use of Māori Purpose Zoned land with areas of indigenous vegetation and indigenous fauna habitat, where land use and subdivision is consistent with tikanga and mātauranga Māori and <del>minimises</del> adverse effects <b>are managed in accordance with Chapter 7, Policies 2 to 5 of the WCRPS</b> <del>on any significant values of the vegetation or fauna habitat.</del>

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Chris J Coll Surveying Limited (S566)	S566.091	Ecosystems and Indigenous Biodiversity	ECO - P5	Support		Retain
William McLaughlin (S567)	S567.173	Ecosystems and Indigenous Biodiversity	ECO - P5	Support		Retain
Laura Coll McLaughlin (S574)	S574.091	Ecosystems and Indigenous Biodiversity	ECO - P5	Support		Retain
Grey District Council (S608)	S608.049	Ecosystems and Indigenous Biodiversity	ECO - P5	Support	Gives effect to Policies of the West Coast RPS.	Retain as notified
David Moore (S65)	S65.013	Ecosystems and Indigenous Biodiversity	ECO - P6	Support		Retain
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.321	Ecosystems and Indigenous Biodiversity	ECO - P6	Support	We support this policy.	Retain policy.
West Coast Penguin Trust (S275)	S275.004	Ecosystems and Indigenous Biodiversity	ECO - P6	Amend	<p>Some of the most valued and recognised fauna species in the region fall just outside the top three Threat Categories and we believe those species should have the protection afforded by this policy.</p> <p>The West Coast Regional Policy Statement, at Appendix 1: 'Ecological criteria for identifying significant terrestrial and freshwater indigenous biological diversity', includes at 2(b), "Indigenous vegetation or habitat of indigenous fauna that supports an indigenous species that is threatened, at risk, or uncommon, nationally or within the relevant ecological district", i.e. extending protection beyond those classified as 'Threatened' (including Nationally Critical, Nationally Endangered</p>	Extend ECO-P6(c) to include all Threatened and At Risk species. We would like to see the following revision or similar used: <b>Result in a reasonably measurable reduction in the local population of threatened taxa in the Department of Conservation Threat Classification System in the Threatened (Nationally Critical, Nationally Endangered, Nationally Vulnerable and Nationally Increasing) and At Risk (Declining, Recovering, Relict and Naturally Uncommon) classifications.</b>

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					and Nationally Vulnerable) to those classified as 'At Risk' and including Declining, Recovering, Relict and Naturally Uncommon species.	
Transpower New Zealand Limited (S299)	S299.074	Ecosystems and Indigenous Biodiversity	ECO - P6	Oppose	Given the lack of identified SNA's across the region, Transpower has concerns as to the wide application of ECO-P6 given the avoid directive within the policy, and that it is not clearly confined to significant indigenous vegetation. Specific concerns are as follows: - Clause a. is very directive and could be applied such that no changes would be enabled. - Clause b. provides no reference to scale as to the site and effect that is, does it relate to the SNA as a whole or just the site), the term 'disruption' is open ended and not a commonly understood ecological term, and the clause is unclear as to whether the reference to 'one or two of the Threatened Environment Classification' applies to all the clause or just 'functions or connections'. - Clause c. reflects the RPS.	Clarify the relationship between activities within the Energy Chapter and those within the Ecosystem Chapter, adopt the 'seek to avoid' approach (policy ENG-P8) for the National Grid in respect of SNA's.
Manawa Energy Limited (Manawa Energy) (S438)	S438.078	Ecosystems and Indigenous Biodiversity	ECO - P6	Oppose in part	Manawa considers that ECO P6, P7 and P9 should be considered in combination, and that there should be sufficient consistency between these provisions to provide certainty for Plan users. In addition, it considers that these provisions are not sufficiently consistent with those contained in the Regional Policy Statement. Manawa supports the specific inclusion and reference to renewable electricity generation activities, and acknowledgment of the location of these activities within areas of significant indigenous vegetation and significant	Amend ECO - P6 as follows: When assessing consents for subdivision, use and development <b>in areas of significant indigenous vegetation and significant habitats of indigenous fauna, enable activities which will not:</b> a. Prevent an indigenous species or community being able to persist in their habitats within their natural range in the Ecological District; b. Result in a degradation of the threat status; <del>further measurable loss of indigenous cover or disruption to ecological processes, functions or connections in land environments in</del> of category one or two <b>species listed in</b> the Threatened Environment Classification at the Ecological District

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					<p>habitats of indigenous fauna.</p> <p>In general, Manawa considers that these provisions should:</p> <ul style="list-style-type: none"> <li>• Be consistent with those included in the RPS and use the same terms/ approaches as this higher order document and the NPS - REG 2011, and the effects management hierarchy outlined in the NPS - FW (where applicable and appropriate).</li> <li>• Ensure that those matters listed in P6 are accurate and measurable for all parties. The term 'avoid' is very strong and directive language, and Manawa Energy consider that this should only be used where essential to ensure the outcomes of the Act.</li> <li>• Beyond the matters covered in P6, the policies should focus less on 'avoidance' and more on enabling provisions, particularly as these relation to the maintenance, operation, upgrading and development of Renewable Electricity Generation and regionally significant infrastructure.</li> <li>• It is not appropriate to consider activities outside identified significant natural areas as part of cumulative effects as these are not subject to ECO rules. It is unreasonable to penalise an activity in an identified area based on other unrelated activities further afield.</li> <li>• It is necessary to recognise the functional and operational need for critical infrastructure to operate or establish within areas of significant indigenous vegetation and significant habitats of indigenous fauna.</li> </ul> <p>Manawa also considers it important that</p>	<p>level [as at 14 July 2022]; and</p> <p>c. Result in a reasonably measurable significant reduction in the local population of threatened taxa in the Department of Conservation Threat Categories 1 - 3a -nationally critical, nationally endangered and nationally vulnerable.</p>

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					the pTTPP does not rely on external documents which are not clearly referenced and may be subject to change (thereby providing a lack of certainty for Plan users). These references should be removed, or if kept then they need to be linked to a specific version or date of any relevant document and what specific parts of that document/s are being referenced.	
New Zealand Coal & Carbon Limited (S472)	S472.015	Ecosystems and Indigenous Biodiversity	ECO - P6	Oppose in part	Using the word avoid may prevent the use of the effects management hierarchy, given the case law definition of this, and/or be inconsistent with the Regional Policy Statement.	Delete the word "avoid".
Bathurst Resources Limited and BT Mining Limited (S491)	S491.016	Ecosystems and Indigenous Biodiversity	ECO - P6	Amend	The use of the term "avoid" needs to be qualified with the ability to apply the effects hierarchy	Amend: When assessing consents for subdivision, use and development, <del>avoid activities which will:</del> <b>apply the effects hierarchy to avoid, remedy, mitigate, offset or compensate the effects of activities to:</b> a. <del>Prevent</del> <b>Enable</b> an indigenous species or community being able to persist in their habitats within their natural range in the Ecological District; b. Result in <del>no</del> <b>a</b> degradation of the threat status, no more than a minor measurable loss of indigenous cover or disruption to ecological processes, functions or connections in land environments in category one or two of the Threatened Environment Classification at the Ecological District level; and c. Result in a <b>no material</b> reduction in the ongoing viability of the local population of threatened taxa in the Department of Conservation Threat Categories 1 - 3a - nationally critical, nationally endangered and nationally vulnerable.

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TiGa Minerals and Metals Limited (S493)	S493.050	Ecosystems and Indigenous Biodiversity	ECO - P6	Amend	Inconsistent with the same policy in the West Coast Regional Policy Statement.	Amend: When assessing consents for subdivision, use and development, avoid activities which will: a. ...; b. Result in a degradation of the threat status, further measurable loss of indigenous cover <b>(with the exception of Manuka and Kanuka)</b> <del>or disruption to ecological processes, functions or connections</del> in land environments in category one or two ...
Steve Croasdale (S516)	S516.035	Ecosystems and Indigenous Biodiversity	ECO - P6	Amend	I believe that some of the terms used in this policy need defining.	Define the technical ecological terms used in this policy.
Aggregate and Quarry Association (S521)	S521.006	Ecosystems and Indigenous Biodiversity	ECO - P6	Amend	"Avoid" means avoid in a prohibitive sense.	Add below Item c., <b>where these activities cannot be avoided, ensure that the adverse effects are remedied, mitigated or offset.</b>
Federated Farmers of New Zealand (S524)	S524.063	Ecosystems and Indigenous Biodiversity	ECO - P6	Not Stated	There is more explanation required with regard to c. How does a plan user find this list?	Provide more explanation in regard to ECO-P6(c)
Straterra (S536)	S536.024	Ecosystems and Indigenous Biodiversity	ECO - P6	Oppose	Because of case law <sup>1</sup> which deems 'avoid' to mean avoid in a prohibitive sense, we request that care be taken in using the word and it be avoided wherever possible. Where the word is used by itself without the rest of the hierarchy there is a risk it is interpreted as prohibited and so it should be avoided.	Remove the word "avoid" from the policy
Straterra (S536)	S536.048	Ecosystems and Indigenous Biodiversity	ECO - P6	Amend	Using the word avoid may prevent the use of the management or mitigation hierarchy, given the case law definition of this, and/or be inconsistent with the Regional Policy Statement.	Delete the word "avoid".
Buller District Council (S538)	S538.202	Ecosystems and Indigenous Biodiversity	ECO - P6	Support in part	Council understands that Policy 6 is intended to implement Policy 7.2 of the RPS which seeks to prevent certain outcomes occurring, described in the RPS explanation to the policy as 'bottom lines'.	Include definitions for 'further measurable loss' and 'reasonably measurable reduction in the local population' in the Definition section.

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					Council is concerned that the references in Policy 6(b) to "further measurable loss" and in clause 6(c) to "reasonably measurable reduction in the local population" without direction may result in inconsistent outcomes. Clarification is required on what constitutes 'measurable loss/reduction' and what constitutes the 'local population' - is this at the SNA or ecological assessment level?	
Westpower Limited (S547)	S547.254	Ecosystems and Indigenous Biodiversity	ECO - P6	Amend	Should be amended to apply to both consent processes and permitted activities.	Amend When <b>providing</b> for <del>assessing consents</del> subdivision, use and development, avoid activities which will: ...
Westpower Limited (S547)	S547.255	Ecosystems and Indigenous Biodiversity	ECO - P6	Amend	Reworded to give effect to the RPS and consistency.	Amend items a. and b. to the wording of Policies 2(a)-(c) of the RPS.
Chris & Jan Coll (S558)	S558.092	Ecosystems and Indigenous Biodiversity	ECO - P6	Amend	some of the terms used in this policy need defining.	Define the technical ecological terms used in this policy.
Chris & Jan Coll (S558)	S558.093	Ecosystems and Indigenous Biodiversity	ECO - P6	Amend	Biodiversity offsetting or compensation should be provided for.	Provide for biodiversity offsetting or compensation.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.205	Ecosystems and Indigenous Biodiversity	ECO - P6	Amend	We support the clear direction to avoid certain effects. However, the policy takes a different approach to activities with respect to the matters set out and uses different wording than the similar Policy 2 in Chapter 7 of the WCRPS. This creates uncertainty and potential inconsistencies with giving effect to the WCRPS.	Delete ECO - P6, and replace with the exact wording of Policy 2, Chapter 7 of the WCRPS.
Geoff Volckman (S563)	S563.023	Ecosystems and Indigenous Biodiversity	ECO - P6	Amend	We believe that some of the terms used in this policy need defining.	Define the technical ecological terms used in this policy.
Catherine Smart-Simpson (S564)	S564.028	Ecosystems and Indigenous Biodiversity	ECO - P6	Amend	We believe that some of the terms used in this policy need defining.	Define the technical ecological terms used in this policy.



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Chris J Coll Surveying Limited (S566)	S566.092	Ecosystems and Indigenous Biodiversity	ECO - P6	Amend	some of the terms used in this policy need defining.	Define the technical ecological terms used in this policy.
Chris J Coll Surveying Limited (S566)	S566.093	Ecosystems and Indigenous Biodiversity	ECO - P6	Amend	Biodiversity offsetting or compensation should be provided for.	Provide for biodiversity offsetting or compensation.
William McLaughlin (S567)	S567.174	Ecosystems and Indigenous Biodiversity	ECO - P6	Amend	some of the terms used in this policy need defining.	Define the technical ecological terms used in this policy.
William McLaughlin (S567)	S567.175	Ecosystems and Indigenous Biodiversity	ECO - P6	Amend	Biodiversity offsetting or compensation should be provided for.	Provide for biodiversity offsetting or compensation.
Laura Coll McLaughlin (S574)	S574.092	Ecosystems and Indigenous Biodiversity	ECO - P6	Amend	some of the terms used in this policy need defining.	Define the technical ecological terms used in this policy.
Laura Coll McLaughlin (S574)	S574.093	Ecosystems and Indigenous Biodiversity	ECO - P6	Amend	Biodiversity offsetting or compensation should be provided for.	Provide for biodiversity offsetting or compensation.
Koiterangi Lime Co LTD (S577)	S577.035	Ecosystems and Indigenous Biodiversity	ECO - P6	Amend	Some of the terms used in this policy need defining.	Define the technical ecological terms used in this policy.
WMS Group (HQ) Limited and WMS Land Co. Limited (S599)	S599.054	Ecosystems and Indigenous Biodiversity	ECO - P6	Oppose	Contains language which is inconsistent with the same policy in the West Coast Regional Policy Statement	Amend ECO P6 as follows: When assessing consents for subdivision, use and development, avoid activities which will: <ul style="list-style-type: none"> <li>a. Prevent an indigenous species or community being able to persist in their habitats within their natural range in the Ecological District;</li> <li>b. Result in a degradation of the threat status, further measurable loss of indigenous cover <b>with the exception of Manuka and Kanuka</b> or disruption to ecological processes, functions or connections in land environments in category one or two of the Threatened Environment Classification at the Ecological District level; and</li> <li>c. Result in a reasonably measurable reduction in the local population of threatened taxa in the</li> </ul>

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						Department of Conservation Threat Categories 1 - 3a -nationally critical, nationally endangered and nationally vulnerable."''''
Birchfield Coal Mines Ltd (S601)	S601.037	Ecosystems and Indigenous Biodiversity	ECO - P6	Amend	Inconsistent with the West Coast Regional Policy Statement	Amend ECO P6 as follows: "When assessing consents for subdivision, use and development, <del>avoid</del> activities <b>shall be designed and undertaken in a way that does not:</b> <del>which will:</del> a. ... b. Result in a degradation of the threat status, further measurable loss of indigenous cover ( <b>with the exception of Manuka and Kanuka</b> ) <del>or disruption to ecological processes, functions or connections</del> in land environments in category one or two of the Threatened Environment Classification at the Ecological District level; and ...
Department of Conservation (S602)	S602.070	Ecosystems and Indigenous Biodiversity	ECO - P6	Amend	Amend ECO-P6 to simplify the policy by referring to Threatened or At Risk (Declining) species, and to ensure the policy also captures locally endemic species important to the West Coast.	Amend Policy ECO-P6: When assessing consents for subdivision, use and development, avoid activities which will: a. Prevent an indigenous species or community being able to persist in their habitats within their natural range in the Ecological District; b. Result in a degradation of the threat status, further measurable loss of indigenous cover or disruption to ecological processes, functions or connections in land environments in category one or two of the Threatened Environment Classification at the Ecological District level; and c. Result in <b>a reduction in the population size or occupancy of Threatened or At Risk (Declining) species</b> <del>a reasonably measurable reduction in the local population of threatened taxa in the Department of Conservation Threat</del>

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<del>Categories 1 – 3a nationally critical, nationally endangered and nationally vulnerable or in the population size or occupancy of locally endemic species.</del>
BRM Developments Limited (S603)	S603.026	Ecosystems and Indigenous Biodiversity	ECO - P6	Amend	Inconsistent with the same policy in the West Coast Regional Policy Statement	Amend ECO P6 as follows: "When assessing consents for subdivision, use and development, <del>avoid</del> activities <b>shall be designed and undertaken in a way that does not: which will:</b> a. Prevent an indigenous species or community being able to persist in their habitats within their natural range in the Ecological District; b. Result in a degradation of the threat status, further measurable loss of indigenous cover <b>(with the exception of Manuka and Kanuka)</b> <del>or disruption to ecological processes, functions or connections in land environments ...</del>
Birchfield Ross Mining Limited (S604)	S604.031	Ecosystems and Indigenous Biodiversity	ECO - P6	Amend	Language which is inconsistent with the same policy in the West Coast Regional Policy Statement	Amend ECO P6 as follows: "When assessing consents for subdivision, use and development, <del>avoid</del> activities <b>shall be designed and undertaken in a way that does not: which will:</b> a. ....
Birchfield Ross Mining Limited (S604)	S604.112	Ecosystems and Indigenous Biodiversity	ECO - P6	Amend	should also include an exception for Manuka and Kanuka	Amend ECO P6 as follows: "When assessing consents for subdivision, use and development, ... b. Result in a degradation of the threat status, further measurable loss of indigenous cover <b>(with the exception of Manuka and Kanuka)</b> <del>or disruption to ecological processes, functions or connections...</del>
Phoenix Minerals Limited (S606)	S606.027	Ecosystems and Indigenous Biodiversity	ECO - P6	Amend	Inconsistent with the West Coast Regional Policy Statement	Amend : When assessing consents for subdivision, use and development, <del>avoid</del> activities <b>shall be designed and undertaken in a way that does not: which will:</b>  a. Prevent an indigenous species or community

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						being able to persist in their habitats within their natural range in the Ecological District; b. Result in a degradation of the threat status, further measurable loss of indigenous cover ( <b>with the exception of Manuka and Kanuka</b> ) <del>or disruption to ecological processes, functions or connections</del> in land environments in category one or two of the Threatened Environment Classification at the Ecological District level; and ...
Whyte Gold Limited (S607)	S607.026	Ecosystems and Indigenous Biodiversity	ECO - P6	Amend	Contains language which is inconsistent with the West Coast Regional Policy Statement	Amend ECO P6 as follows: "When assessing consents for subdivision, use and development, <del>avoid</del> activities <b>shall be designed and undertaken in a way that does not:</b> <del>which will:</del> ... b. ... ( <b>with the exception of Manuka and Kanuka</b> ) <del>or disruption to ecological processes, functions or connections</del> ...
Grey District Council (S608)	S608.050	Ecosystems and Indigenous Biodiversity	ECO - P6	Support	Gives effect to Policies of the West Coast RPS.	Retain as notified
Karamea Lime Company (S614)	S614.044	Ecosystems and Indigenous Biodiversity	ECO - P6	Support	Believe that some of the terms used in this policy need defining.	Define the technical ecological terms used in this policy.
Peter Langford (S615)	S615.044	Ecosystems and Indigenous Biodiversity	ECO - P6	Support	Believe that some of the terms used in this policy need defining.	Define the technical ecological terms used in this policy.
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.322	Ecosystems and Indigenous Biodiversity	ECO - P7	Support in part	We recommend that ECO-P7 refer to the effects management hierarchy, as an approach to best protect and manage adverse effects on biodiversity, as used for example in the NPS -FM and the Draft NPS-IB. Equally, we suggest that the language of a 'precautionary approach' is included to align with the Draft NPS-IB.	Amend ECO-P7 as follows: When assessing resource consents in areas of significant indigenous vegetation and significant habitats of indigenous fauna, take a precautionary approach and consider the following matters: a. The necessity for the activity to provide for critical infrastructure or renewable electricity generation; ...

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						g. The impact of the activity on the values of any area of significant indigenous vegetation or habitat, or threatened species and how any potential impact could be avoided, remedied, or mitigated <b>using the effects management hierarchy</b> ; and h. The appropriateness of any biodiversity offsetting or compensation in accordance with Policy 9 to offset any residual adverse effects that remain after avoiding, remedying and mitigating measures have been applied.
Manawa Energy Limited (Manawa Energy) (S438)	S438.079	Ecosystems and Indigenous Biodiversity	ECO - P7	Oppose in part		Amend ECO - P7 as follows: When assessing resource consents in areas of significant indigenous vegetation and significant habitats of indigenous fauna, consider the following matters: a. The necessity for the activity to provide for <b>regionally significant critical</b> infrastructure or renewable electricity generation; b. ... d. The cumulative effects of activities within <del>or adjacent</del> to any area of significant indigenous vegetation or habitat; h. The appropriateness of any biodiversity offsetting or compensation in accordance with Policy 9 to offset any <b>significant</b> residual adverse effects that remain after avoiding, remedying and mitigating measures have been applied; <b>i. the functional or operational need for activities to locate in that area</b>
KiwiRail Holdings Limited (S442)	S442.050	Ecosystems and Indigenous Biodiversity	ECO - P7	Support	KiwiRail supports ECO-P7 a. and g. which recognise the necessity of critical infrastructure and provides a hierarchy of avoid, remedy or mitigate impacts.	Retain as proposed
Suzanne Hills (S443)	S443.025	Ecosystems and Indigenous Biodiversity	ECO - P7	Amend	ECO P7 h on biodiversity offsetting and compensation are distilled from the RPS and lost some meaning	Amend the policy on biodiversity offsetting and compensation to ensure this gives effect to the

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						RPS.
Waka Kotahi NZ Transport Agency (S450)	S450.084	Ecosystems and Indigenous Biodiversity	ECO - P7	Support	Waka Kotahi supports the policy as it considers the necessity for the activity to provide for critical infrastructure while providing for biodiversity offsetting or compensation where appropriate to offset any residual adverse effects that remain after avoiding, remedying, and mitigating measures have been applied.	Retain as proposed
New Zealand Coal & Carbon Limited (S472)	S472.016	Ecosystems and Indigenous Biodiversity	ECO - P7	Oppose in part	In practice management alone can also lead to the desired outcome. This ties into ECO-P8.	At item b. insert the word "/or" after the words "protection and".
TiGa Minerals and Metals Limited (S493)	S493.051	Ecosystems and Indigenous Biodiversity	ECO - P7	Amend	The policy recognises the need to provide for offsetting or compensation to deal with residual adverse effects, and this is supported. This policy should also recognise the fixed-in-location nature of minerals extraction, and the fact that sometimes the location of minerals locations coincide with, and have a functional and/or operational need to occur within, areas containing indigenous biodiversity.	Amend: When assessing resource consents in areas of significant indigenous vegetation and significant habitats of indigenous fauna, consider the following matters: a. ...; <b>h. The functional or operational need for the activity to occur within areas of significant indigenous vegetation or significant habitats of indigenous fauna;</b> and <b>hi.</b> The appropriateness of any biodiversity offsetting or compensation in accordance with Policy 9 to offset any residual adverse effects that remain after avoiding, remedying and mitigating measures have been applied.
Leonie Avery (S507)	S507.037	Ecosystems and Indigenous Biodiversity	ECO - P7	Oppose in part	We support that this policy provides for consideration of "the appropriateness of any biodiversity offsetting or compensation in accordance with Policy 9 to offset any residual adverse effects that remain after avoiding, remedying and mitigating measures have been applied."	Retain as notified.
Jared Avery (S508)	S508.037	Ecosystems and Indigenous Biodiversity	ECO - P7	Oppose in part	We support that this policy provides for consideration of "the appropriateness of any biodiversity offsetting or compensation in accordance with Policy	Retain as notified.

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					9 to offset any residual adverse effects that remain after avoiding, remedying and mitigating measures have been applied."	
Kyle Avery (S509)	S509.037	Ecosystems and Indigenous Biodiversity	ECO - P7	Oppose in part	We support that this policy provides for consideration of "the appropriateness of any biodiversity offsetting or compensation in accordance with Policy 9 to offset any residual adverse effects that remain after avoiding, remedying and mitigating measures have been applied."	Retain as notified.
Avery Bros (S510)	S510.037	Ecosystems and Indigenous Biodiversity	ECO - P7	Oppose in part	We support that this policy provides for consideration of "the appropriateness of any biodiversity offsetting or compensation in accordance with Policy 9 to offset any residual adverse effects that remain after avoiding, remedying and mitigating measures have been applied."	Retain as notified.
Bradshaw Farms (S511)	S511.037	Ecosystems and Indigenous Biodiversity	ECO - P7	Oppose in part	We support that this policy provides for consideration of "the appropriateness of any biodiversity offsetting or compensation in accordance with Policy 9 to offset any residual adverse effects that remain after avoiding, remedying and mitigating measures have been applied."	Retain as notified.
Paul Avery (S512)	S512.037	Ecosystems and Indigenous Biodiversity	ECO - P7	Oppose in part	We support that this policy provides for consideration of "the appropriateness of any biodiversity offsetting or compensation in accordance with Policy 9 to offset any residual adverse effects that remain after avoiding, remedying and mitigating measures have been applied."	Retain as notified.
Brett Avery (S513)	S513.037	Ecosystems and Indigenous Biodiversity	ECO - P7	Oppose in part	We support that this policy provides for consideration of "the appropriateness of any biodiversity offsetting or compensation in accordance with Policy 9 to offset any residual adverse effects that remain after avoiding, remedying and mitigating measures have been applied."	Retain as notified.

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Steve Croasdale (S516)	S516.036	Ecosystems and Indigenous Biodiversity	ECO - P7	Amend	the fixed location of mineral deposits is not provided for in the policy.	Retain point h. Amend to recognise that, in some instances, vegetation clearance is unavoidable (e.g. in the case of accessing mineral resource) but that these effects can be temporary due so subsequent restoration processes
Neil Mouat (S535)	S535.012	Ecosystems and Indigenous Biodiversity	ECO - P7	Support in part	We support that this policy provides for consideration of "the appropriateness of any biodiversity offsetting or compensation in accordance with Policy 9 to offset any residual adverse effects that remain after avoiding, remedying and mitigating measures have been applied."	Retain as notified.
Straterra (S536)	S536.021	Ecosystems and Indigenous Biodiversity	ECO - P7	Support	We note and support the consenting pathway for mineral extraction in ECO-P7.	Retain as notified
Straterra (S536)	S536.049	Ecosystems and Indigenous Biodiversity	ECO - P7	Amend	In practice management alone can also lead to the desired outcome. This ties into ECO-P8.	At item b insert the word <i>"or"</i> after the word <i>"and"</i> .
Buller District Council (S538)	S538.203	Ecosystems and Indigenous Biodiversity	ECO - P7	Support in part	As discussed above, the SNA identification process may capture large areas of the District with indigenous vegetation and Council is concerned that critical infrastructure and appropriate land use and development is provided for. Council considers that when assessing resource consent applications for activities within SNAs, consideration is given to any functional, operational or locational constraints e.g. mineral resources are fixed in location and infrastructure is often constrained by functional or operational requirements. Council also considers that the temporary or permanent nature of adverse effects should also be a relevant consideration.	Amend Policy 7 and include additional clauses as follows:  When assessing resource consents in areas of significant indigenous vegetation and significant habitats of indigenous fauna, consider the following matters: ..... <b>Any functional, operational or locational constraints;</b> <b>The temporary or permanent nature of any adverse effects;</b>



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Buller Conservation Group (S552)	S552.070	Ecosystems and Indigenous Biodiversity	ECO - P7	Amend	Consistent use of language	b. Whether formal protection and active management of all or part of any area of significant indigenous vegetation or habitat will occur as part of the <b>resource consent process subdivision, use or development</b> ; d The cumulative <b>adverse effects on biodiversity</b> of activities within or adjacent to any area of significant indigenous vegetation or habitat; <b>and the cumulative effects within the catchment/district</b> ; g. The impact of the activity on the values of any area of significant indigenous vegetation or habitat, and how any potential impact could <b>firstly</b> be avoided, <b>and if that is not possible then consider using the adverse effects hierarchy.</b> <del>remedied or mitigated</del>
Frida Inta (S553)	S553.070	Ecosystems and Indigenous Biodiversity	ECO - P7	Amend	The adverse effects hierarchy should be followed.	b. Whether formal protection and active management of all or part of any area of significant indigenous vegetation or habitat will occur as part of the <b>resource consent process subdivision, use or development</b> ; d The cumulative <b>adverse effects on biodiversity</b> of activities within or adjacent to any area of significant indigenous vegetation or habitat; <b>and the cumulative effects within the catchment/district</b> ; g. The impact of the activity on the values of any area of significant indigenous vegetation or habitat, and how any potential impact could <b>firstly</b> be avoided, <b>and if that is not possible then consider using the adverse effects hierarchy.</b> <del>remedied or mitigated</del>
Chris & Jan Coll (S558)	S558.094	Ecosystems and Indigenous Biodiversity	ECO - P7	Support	The appropriateness of any biodiversity offsetting or compensation.	Retain point h.

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Chris & Jan Coll (S558)	S558.095	Ecosystems and Indigenous Biodiversity	ECO - P7	Amend	the fixed location or temporary nature of mineral deposits is not provided for.	Amend to recognise that, in some instances, vegetation clearance is unavoidable (e.g. in the case of accessing mineral resource) but that these effects can be temporary due so subsequent restoration processes.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.207	Ecosystems and Indigenous Biodiversity	ECO - P7	Amend	Changes are required to ensure that the WCRPS is given effect to in this policy.	Amend Policy ECO- P7:  "When assessing resource consents in <b>or adjacent to areas of Significant Natural Areas</b> indigenous vegetation and significant habitats of indigenous fauna, <b>apply Chapter 7, Policies 2-6 WCRPS. To the extent that it is consistent with those policies</b> , also consider the following matters: ... .
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.478	Ecosystems and Indigenous Biodiversity	ECO - P7	Amend	Changes are required to address uncertainty with what is intended by "activity management" to clarify that the policy applies with respect to adjacent Significant Natural Areas, and also terminology for Significant Natural Areas.	Amend: a. ... b. Whether formal protection and <b>active management of measures to restore or improve</b> all or part of any area of <del>Significant Natural Area(s) indigenous vegetation or habitat</del> will occur as part of the subdivision, use or development; c. ... d. The cumulative effects of activities within or adjacent to <b>any Significant Natural Area of significant indigenous vegetation or habitat</b> ; e... <b>x. The adequacy of an assessment applying the significance criteria set out in Appendix 1 of the West Coast Regional Policy Statement</b> ; g. The impact of the activity on the values of any area of significant indigenous vegetation or habitat, or threatened species and how any potential impact could be avoided, remedied, or mitigated; and ...
Geoff Volckman (S563)	S563.024	Ecosystems and Indigenous Biodiversity	ECO - P7	Amend	Provides for the appropriateness of any biodiversity offsetting or compensation	Retain point h.

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Geoff Volckman (S563)	S563.025	Ecosystems and Indigenous Biodiversity	ECO - P7	Amend	the fixed location of mineral deposits is not provided for in the policy.	Amend to recognise that, in some instances, vegetation clearance is unavoidable (e.g. in the case of accessing mineral resource) but that these effects can be temporary due so subsequent restoration processes.
Catherine Smart-Simpson (S564)	S564.029	Ecosystems and Indigenous Biodiversity	ECO - P7	Amend	provides for consideration of the appropriateness of any biodiversity offsetting or compensation	Retain point h.
Catherine Smart-Simpson (S564)	S564.030	Ecosystems and Indigenous Biodiversity	ECO - P7	Amend	The fixed location of mineral deposits is not provided for.	<b>Amend to recognise vegetation clearance is unavoidable (e.g. in the case of accessing mineral resource) but that these effects can be temporary due so subsequent restoration processes.</b>
Chris J Coll Surveying Limited (S566)	S566.094	Ecosystems and Indigenous Biodiversity	ECO - P7	Support	The appropriateness of any biodiversity offsetting or compensation.	Retain point h.
Chris J Coll Surveying Limited (S566)	S566.095	Ecosystems and Indigenous Biodiversity	ECO - P7	Amend	the fixed location or temporary nature of mineral deposits is not provided for.	Amend to recognise that, in some instances, vegetation clearance is unavoidable (e.g. in the case of accessing mineral resource) but that these effects can be temporary due so subsequent restoration processes.
William McLaughlin (S567)	S567.176	Ecosystems and Indigenous Biodiversity	ECO - P7	Support	The appropriateness of any biodiversity offsetting or compensation.	Retain point h.
William McLaughlin (S567)	S567.177	Ecosystems and Indigenous Biodiversity	ECO - P7	Amend	the fixed location or temporary nature of mineral deposits is not provided for.	Amend to recognise that, in some instances, vegetation clearance is unavoidable (e.g. in the case of accessing mineral resource) but that these effects can be temporary due so subsequent restoration processes.
Laura Coll McLaughlin (S574)	S574.094	Ecosystems and Indigenous Biodiversity	ECO - P7	Support	The appropriateness of any biodiversity offsetting or compensation.	Retain point h.
Laura Coll McLaughlin (S574)	S574.095	Ecosystems and Indigenous Biodiversity	ECO - P7	Amend	the fixed location or temporary nature of mineral deposits is not provided for.	Amend to recognise that, in some instances, vegetation clearance is unavoidable (e.g. in the case of accessing mineral resource) but that these effects can be temporary due so

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						subsequent restoration processes.
Koiterangi Lime Co LTD (S577)	S577.036	Ecosystems and Indigenous Biodiversity	ECO - P7	Support	Consideration of "the appropriateness of any biodiversity offsetting or compensation.	Retain point h.
Koiterangi Lime Co LTD (S577)	S577.037	Ecosystems and Indigenous Biodiversity	ECO - P7	Support	the fixed location of mineral deposits is not provided for in the policy.	Amend to recognise that, in some instances, vegetation clearance is unavoidable (e.g. in the case of accessing mineral resource) but that these effects can be temporary due so subsequent restoration processes.
Birchfield Coal Mines Ltd (S601)	S601.038	Ecosystems and Indigenous Biodiversity	ECO - P7	Amend	Should also recognise the fixed-in-location nature of minerals extraction	Amend ECO - P7 as follows: When assessing resource consents in areas of significant indigenous vegetation and significant habitats of indigenous fauna, consider the following matters: a. ...; <b>h. The functional or operational need for the activity to occur within areas of significant indigenous vegetation or significant habitats of indigenous fauna;</b> and hi....
Department of Conservation (S602)	S602.071	Ecosystems and Indigenous Biodiversity	ECO - P7	Amend	Ensure that when assessing resource consent applications, locational constraints are considered for any critical infrastructure or renewable electricity generation, an assessment of alternative is provided, the effects management hierarchy is applied, and where offsetting and compensation is provided, a net gain is achieved.	Amend: When assessing resource consents in areas of significant indigenous vegetation and significant habitats of indigenous fauna, consider the following matters: a. The necessity for the activity to provide for critical infrastructure or renewable electricity generation <b>and the extent to which these activities are locationally constrained;</b> <b>b. Whether an assessment of alternatives has been provided;</b> c. ... h. The impact of the activity on the values of any area of significant indigenous vegetation or habitat, or threatened species and <del>how</del> <b>extent to which</b> any potential impact could be avoided, remedied or mitigated <b>by applying the effects management hierarchy;</b> and

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						i. The appropriateness of any biodiversity offset or compensation in accordance with Policy 9 to <del>offset</del> <b>address</b> any residual adverse effects that remain after avoiding, <b>minimising</b> , remedying and mitigating measures have been applied-; <b>andj. The extent of net gain achieved by biodiversity offsetting or compensation.</b>
BRM Developments Limited (S603)	S603.027	Ecosystems and Indigenous Biodiversity	ECO - P7	Amend	Recognises the need to provide for offsetting or compensation to deal with residual adverse effects.	Amend:  When assessing resource consents in areas of significant indigenous vegetation and significant habitats of indigenous fauna, consider the following matters: a. ...h. <b>The functional or operational need for the activity to occur within areas of significant indigenous vegetation or significant habitats of indigenous fauna;</b> and hi. ...
Birchfield Ross Mining Limited (S604)	S604.032	Ecosystems and Indigenous Biodiversity	ECO - P7	Support	Recognises the need to provide for offsetting or compensation	Retain
Birchfield Ross Mining Limited (S604)	S604.113	Ecosystems and Indigenous Biodiversity	ECO - P7	Amend	Recognise the fixed-in-location nature of minerals extraction..	Amend ECO - P7 as follows: When assessing resource consents in areas of significant indigenous vegetation and significant habitats of indigenous fauna, consider the following matters: a. ... <b>h. The functional or operational need for the activity to occur within areas of significant indigenous vegetation or significant habitats of indigenous fauna;</b> and hi. ....
Phoenix Minerals Limited (S606)	S606.094	Ecosystems and Indigenous Biodiversity	ECO - P7	Amend	Should also recognise the fixed-in-location nature of minerals extraction	Amend ECO - P7 as follows: When assessing resource consents..., consider the following matters: a. ...; <b>h. The functional or operational need for the activity to occur within areas of significant indigenous vegetation or significant habitats of indigenous fauna; and</b>

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						h i ...
Whyte Gold Limited (S607)	S607.027	Ecosystems and Indigenous Biodiversity	ECO - P7	Amend	Should also recognise the fixed-in-location nature of minerals extraction	Amend ECO - P7 as follows: When assessing resource consents ... <b>h. The functional or operational need for the activity to occur within areas of significant indigenous vegetation or significant habitats of indigenous fauna;</b> and h i ...
Grey District Council (S608)	S608.051	Ecosystems and Indigenous Biodiversity	ECO - P7	Support	Gives effect to Policies of the West Coast RPS.	Retain as notified
Avery Brothers (S609)	S609.036	Ecosystems and Indigenous Biodiversity	ECO - P7	Support	Support that this policy provides for consideration of "the appropriateness of any biodiversity offsetting or compensation..."	Retain
Karamea Lime Company (S614)	S614.045	Ecosystems and Indigenous Biodiversity	ECO - P7	Support	that this policy provides for the appropriateness of any biodiversity offsetting or compensation in accordance with Policy 9	Retain point h
Karamea Lime Company (S614)	S614.046	Ecosystems and Indigenous Biodiversity	ECO - P7	Amend	there could be significant adverse effects as a result of SNA mapping if the fixed location of mineral deposits is not provided for in the policy and the temporary nature of mining is not recognised.	Amend to recognise that, in some instances, vegetation clearance is unavoidable (e.g. in the case of accessing mineral resource) but that these effects can be temporary due so subsequent restoration processes.
Peter Langford (S615)	S615.045	Ecosystems and Indigenous Biodiversity	ECO - P7	Support	that this policy provides for the appropriateness of any biodiversity offsetting or compensation in accordance with Policy 9	Retain point h
Peter Langford (S615)	S615.046	Ecosystems and Indigenous Biodiversity	ECO - P7	Amend	there could be significant adverse effects as a result of SNA mapping if the fixed location of mineral deposits is not provided for in the policy and the temporary nature of mining is not recognised.	Amend to recognise that, in some instances, vegetation clearance is unavoidable (e.g. in the case of accessing mineral resource) but that these effects can be temporary due so subsequent restoration processes.
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae,	S620.143	Ecosystems and Indigenous Biodiversity	ECO - P7	Amend	Cultural matters and cumulative effects not being considered for clearance of	Amend as to read follows: When assessing resource consents in areas of <del>significant</del> indigenous vegetation and <del>significant</del>

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Te Runanga o Makaawhio (S620)					non-significant indigenous vegetation would be inappropriate	habitats of indigenous fauna, consider the following matters: ...
Westpower Limited (S547)	S547.0502	Ecosystems and Indigenous Biodiversity	ECO - P7	Amend	The policy is supported in general, with the following amendments, (1) The policy should be amended to be consistent with wording in the RPS. (2) A minor amendment is required to item "a." given the definition of critical infrastructure. (3) There is some ambiguity in regard to the term adjacent in item "d." given that the policy regard (4) Item "h." should relate to proposals for such matters as these may or may not be offered or required depending on the circumstances.	(1) Amend ECO-P7, "When <b>managing the adverse effects of activities</b> ' in ... matters:" (2) Amend item a., "a. The necessity for ... To provide for <b>energy activities and infrastructure</b> , including critical infrastructure and renewable electricity generation;" (3) Amend item d. to remove "or adjacent to", "d. The cumulative effects of activities <b>within any</b> area of significant indigenous vegetation or habitat." (4) Amend item h., "h. <b>Any proposals</b> for biodiversity offsetting or compensation <b>in relation to</b> residual adverse effects ...".
Westpower Limited (S547)	S547.0505	Ecosystems and Indigenous Biodiversity	ECO - P7	Support in part	The policy is supported in general, with the following amendments, (1) The policy should be amended to be consistent with wording in the RPS. (2) A minor amendment is required to item "a." given the definition of critical infrastructure. (3) There is some ambiguity in regard to the term adjacent in item "d." given that the policy regard activities in SNA's and this should be removed. (4) Item "h." should relate to proposals for such matters as these may or may not be offered or required depending on the circumstances.	(1) Amend ECO-P7, "When <b>managing the adverse effects of activities</b> ' in ... matters:" (2) Amend item a., "a. The necessity for ... To provide for <b>energy activities and infrastructure</b> , including critical infrastructure and renewable electricity generation;" (3) Amend item d. to remove "or adjacent to", "d. The cumulative effects of activities <b>within any</b> area of significant indigenous vegetation or habitat." (4) Amend item h., "h. <b>Any proposals for</b> biodiversity offsetting or compensation in relation to residual adverse effects ...".
David Moore (S65)	S65.014	Ecosystems and Indigenous Biodiversity	ECO - P8	Support		Retain
Katherine Crick (S101)	S101.014	Ecosystems and Indigenous Biodiversity	ECO - P8	Support	This policy does not support the identification of a mineral extraction zone at Barrytown	Retain ECO-P8 in general and in apply to consideration of mineral extraction at Barrytown

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New Zealand Agricultural Aviation Association (S166)	S166.014	Ecosystems and Indigenous Biodiversity	ECO - P8	Amend	There should be recognition in the Plan that vegetation may need to be removed for weed, pest, biosecurity, and biodiversity purposes.	<b>Include an additional clause in ECO-P8:f) providing for clearance of weeds and pests for biosecurity and biodiversity purposes.</b>
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.323	Ecosystems and Indigenous Biodiversity	ECO - P8	Support	We support this policy.	Retain policy.
West Coast Penguin Trust (S275)	S275.005	Ecosystems and Indigenous Biodiversity	ECO - P8	Amend	We welcome and support this policy	Replace "maintain" with "protect, maintain and support the enhancement of"
Roger Ewer (S316)	S316.006	Ecosystems and Indigenous Biodiversity	ECO - P8	Support		Retain ECO - P8
Trevor Hayes (S377)	S377.004	Ecosystems and Indigenous Biodiversity	ECO - P8	Support	Support particularly as relate to threatened coastal forest and wetland habitats	Retain ECO -P8 as notified.
Te Tumu Paeroa - The office of the Māori Trustee (S440)	S440.026	Ecosystems and Indigenous Biodiversity	ECO - P8	Support in part	The Māori Trustee considers that ECO P8(b) should be amended to 'improving access where appropriate' to areas of indigenous biodiversity which are significant to Poutini Ngāi Tahu to acknowledge that some areas of indigenous biodiversity may be located on private land.	The Māori Trustee considers that the following amendments need to be made to policy ECO P8.  Amendments P8(b). Minimising adverse effects on, and <del>providing</del> <b>improving</b> access, <b>where appropriate</b> , to, areas of indigenous biodiversity which are significant to Poutini Ngāi Tahu and Māori landowners;
Clare Backes (S444)	S444.007	Ecosystems and Indigenous Biodiversity	ECO - P8	Amend	The RMA requires Councils to protect outstanding natural features and landscapes from inappropriate subdivision, use and development and to protect areas of significant indigenous vegetation and significant habits of indigenous fauna. The plan does not have policies to do these effectively.	This needs to include "protect, maintain and enhance the indigenous habitats and ecosystems."



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Bathurst Resources Limited and BT Mining Limited (S491)	S491.017	Ecosystems and Indigenous Biodiversity	ECO - P8	Amend	Preserve protected wildlife is inconsistent with RMA s(6)(a) relates to natural character.	Amend: Maintain indigenous habitats and ecosystems across the West Coast/Te Tai o Poutini by: a. ...; d. <del>Preserving protected wildlife; and</del> <b>Protecting significant habitats of indigenous fauna, and</b> e. Recognising the benefits of active management of indigenous biodiversity, including voluntary animal and plant pest and stock control and/or formal legal protection.
TiGa Minerals and Metals Limited (S493)	S493.052	Ecosystems and Indigenous Biodiversity	ECO - P8	Amend	Inconsistent with the Coastal Environment chapter of the West Coast RPS and NZCP 2010.	Amend ECO - P8 as follows: Maintain indigenous habitats and ecosystems across the West Coast/Te Tai o Poutini by: a. ...; b. <del>Minimising</del> <b>Managing</b> adverse effects on, and providing access to, areas of indigenous biodiversity which are significant to Poutini Ngāi Tahu; c. <del>Restricting</del> <b>Managing adverse effects arising from</b> the modification or disturbance of coastal indigenous vegetation, dunes, estuaries and wetlands; d. <del>Preserving</del> <b>Managing adverse effects on</b> protected wildlife; and e. ...
Steve Croasdale (S516)	S516.037	Ecosystems and Indigenous Biodiversity	ECO - P8	Support		Retain
Buller District Council (S538)	S538.204	Ecosystems and Indigenous Biodiversity	ECO - P8	Support	Council supports these policies	Retain as notified.
Westpower Limited (S547)	S547.256	Ecosystems and Indigenous Biodiversity	ECO - P8	Amend	does not include any component of use.	Add <b>f. Providing for the sustainable use of indigenous habitats and ecosystems for the benefit of the community.</b>
Buller Conservation Group (S552)	S552.071	Ecosystems and Indigenous Biodiversity	ECO - P8	Amend	consistency with West Coast Regional Policy Statement	P8 Maintain indigenous habitats and ecosystems across the West Coast/Te Tai o Poutini by a. Maintaining, and where appropriate enhancing or restoring <b>indigenous</b>

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						<b>biodiversity, including</b> the functioning of ecological corridors, linkages, <b>wetlands and dunes</b> , and indigenous coastal vegetation and wetlands; e Recognising <del>that the benefits of</del> active management of indigenous biodiversity, <b>such as including voluntary animal and plant</b> pest and stock control and/or formal legal protection, <b>provides benefits such as ecosystem services.</b>
Frida Inta (S553)	S553.071	Ecosystems and Indigenous Biodiversity	ECO - P8	Amend	Consistency with WC-RPS, chapter 7, Objective 4	Maintain indigenous habitats and ecosystems across the West Coast/Te Tai o Poutini by a. Maintaining, and where appropriate enhancing or restoring <b>indigenous biodiversity, including</b> the functioning of ecological corridors, linkages, <b>wetlands and dunes</b> , and indigenous coastal vegetation and wetlands; ... e Recognising <del>that the benefits of</del> active management of indigenous biodiversity, <b>such as including voluntary animal and plant</b> pest and stock control and/or formal legal protection, <b>provides benefits such as ecosystem services.</b>
Chris & Jan Coll (S558)	S558.096	Ecosystems and Indigenous Biodiversity	ECO - P8	Support		Retain
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.208	Ecosystems and Indigenous Biodiversity	ECO - P8	Amend	While the matters set out are generally considered to be appropriate considerations, they should be in addition, and not as an alternative, to those set out in Policy 8, Chapter 7 of the WCRPS.	Add the exact wording of Policy 8 of the WCRPS into this policy while retaining proposed wording
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.479	Ecosystems and Indigenous Biodiversity	ECO - P8	Amend	Also, 'minimising' is not an appropriate standard for effects management.	b. should refer to <b>avoid, remedy, or mitigate</b> rather than ' <del>minimise</del> '.

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Geoff Volckman (S563)	S563.026	Ecosystems and Indigenous Biodiversity	ECO - P8	Support	We support this policy	Retain
Catherine Smart-Simpson (S564)	S564.031	Ecosystems and Indigenous Biodiversity	ECO - P8	Support		Retain
Chris J Coll Surveying Limited (S566)	S566.096	Ecosystems and Indigenous Biodiversity	ECO - P8	Support		Retain
William McLaughlin (S567)	S567.178	Ecosystems and Indigenous Biodiversity	ECO - P8	Support		Retain
Laura Coll McLaughlin (S574)	S574.096	Ecosystems and Indigenous Biodiversity	ECO - P8	Support		Retain
Koiterangi Lime Co LTD (S577)	S577.038	Ecosystems and Indigenous Biodiversity	ECO - P8	Support		REtain
WMS Group (HQ) Limited and WMS Land Co. Limited (S599)	S599.056	Ecosystems and Indigenous Biodiversity	ECO - P8	Amend	Inconsistent with the Coastal Environment chapter of the West Coast Regional Policy Statement 2020	Amend ECO - P8 as follows: Maintain indigenous habitats and ecosystems across the West Coast/Te Tai o Poutini by:  a. Maintaining, and where appropriate enhancing or restoring the functioning of ecological corridors, linkages, dunes and indigenous coastal vegetation and wetlands;  b. <del>Minimising</del> <b>Managing</b> adverse effects on, and providing access to, areas of indigenous biodiversity which are significant to Poutini Ngāi Tahu;  c. <del>Restricting</del> <b>Managing adverse effects arising from</b> the modification or disturbance of coastal indigenous vegetation, dunes, estuaries and wetlands;  d. <del>Preserving</del> <b>Managing adverse effects on</b> protected wildlife; and  e. Recognising the benefits of active management of

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						indigenous biodiversity, including voluntary animal and plant pest and stock control and/or formal legal protection."
Department of Conservation (S602)	S602.072	Ecosystems and Indigenous Biodiversity	ECO - P8	Amend	Amend Policy ECO-PC8 so the policy seeks to encourage and enable active management, rather than simply recognising the benefits of active management, which are obvious, and to encourage and enable biosecurity programmes to manage plant and predator pests.	Amend : Maintain indigenous habitats and ecosystems across the West Coast/Te Tai o Poutini by: e. <b>Encourage and enable site and landscape scale biosecurity programmes to manage plant and animal pests</b> ; and f. <del>Recognising the benefits of</del> <b>Encouraging and enabling active conservation</b> management of indigenous biodiversity, including voluntary animal and plant pest and stock control and/or formal legal protection.
Grey District Council (S608)	S608.052	Ecosystems and Indigenous Biodiversity	ECO - P8	Support	Gives effect to Policies of the West Coast RPS.	Retain as notified
Karamea Lime Company (S614)	S614.047	Ecosystems and Indigenous Biodiversity	ECO - P8	Support		Retain
Peter Langford (S615)	S615.047	Ecosystems and Indigenous Biodiversity	ECO - P8	Support		Retain
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.144	Ecosystems and Indigenous Biodiversity	ECO - P8	Support	Recognises the importance of ecological corridors the coastal environment and the significance of areas to Poutini Ngāi Tahu.	Retain as notified
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.324	Ecosystems and Indigenous Biodiversity	ECO - P9	Support	We support this policy.	Retain policy.
Manawa Energy Limited (Manawa Energy) (S438)	S438.080	Ecosystems and Indigenous Biodiversity	ECO - P9	Oppose in part		Amend ECO - P9 as follows: Provide for biodiversity offsets and compensation to manage <b>significant</b> residual

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						adverse effects of an activity where: a) The goal of the biodiversity offsets is no net loss and, preferably, a net gain of biodiversity; <b>and</b> b) The conservation outcomes are measurable <del>and positive.</del> ; <del>and c) The biodiversity offsets or compensation are in accordance with best practice, including but not limited to NZ Government guidance on biodiversity offsetting.</del>
Karen Lippiatt (S439)	S439.028	Ecosystems and Indigenous Biodiversity	ECO - P9	Amend		Amend as follows: a. The goal of the biodiversity offsets is <b>no net loss and, preferably</b> , a net gain in biodiversity. <b>The arrangements are legally binding in perpetuity</b>
Suzanne Hills (S443)	S443.026	Ecosystems and Indigenous Biodiversity	ECO - P9	Support	the provisions don't go far enough to give effect to the RPS	Amend the policy to give effect to the RPS and the NZ Government guidance on biodiversity offsetting
Waka Kotahi NZ Transport Agency (S450)	S450.085	Ecosystems and Indigenous Biodiversity	ECO - P9	Support	Waka Kotahi supports the policy as it provides for biodiversity offsets and compensations to manage adverse effects.	Retain as proposed.
Inger Perkins (S462)	S462.016	Ecosystems and Indigenous Biodiversity	ECO - P9	Amend	biodiversity offsets have a great deal of potential but need extremely careful and cautious management if they are to be used. Guidance developed by the Department of Conservation several years ago found that applying a biodiversity offsets approach was extremely problematic. Complex calculations could only be based on like for like. There are situations where residual impacts cannot be fully compensated for by a biodiversity offset because of the irreplaceability or vulnerability of the biodiversity affected and, in such cases, offsetting must not be considered. Thus the 'how to' when	Clarify the guidance which is referred to within the policy and ensure it is sufficiently robust to be effective at achieving the objectives.

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					managing biodiversity offsets is extremely complex. Before referencing government guidance, TTPP needs to be clear on which guidance and that it is sufficiently robust. DOC: <a href="https://www.doc.govt.nz/about-us/our-policies-and-plans/guidance-on-biodiversity-offsetting/">https://www.doc.govt.nz/about-us/our-policies-and-plans/guidance-on-biodiversity-offsetting/</a> Business and Biodiversity Offsets Programme: <a href="https://www.forest-trends.org/wp-content/uploads/2018/10/The-BBOP-Principles_20181023.pdf">https://www.forest-trends.org/wp-content/uploads/2018/10/The-BBOP-Principles_20181023.pdf</a>	
Leonie Avery (S507)	S507.038	Ecosystems and Indigenous Biodiversity	ECO - P9	Support	We support this policy.	Retain as notified.
Jared Avery (S508)	S508.038	Ecosystems and Indigenous Biodiversity	ECO - P9	Support	We support this policy.	Retain as notified.
Kyle Avery (S509)	S509.038	Ecosystems and Indigenous Biodiversity	ECO - P9	Support	We support this policy.	Retain as notified.
Avery Bros (S510)	S510.038	Ecosystems and Indigenous Biodiversity	ECO - P9	Support	We support this policy.	Retain as notified.
Bradshaw Farms (S511)	S511.038	Ecosystems and Indigenous Biodiversity	ECO - P9	Support	We support this policy.	Retain as notified.
Paul Avery (S512)	S512.038	Ecosystems and Indigenous Biodiversity	ECO - P9	Support	We support this policy.	Retain as notified.
Brett Avery (S513)	S513.038	Ecosystems and Indigenous Biodiversity	ECO - P9	Support	We support this policy.	Retain as notified.
Steve Croasdale (S516)	S516.038	Ecosystems and Indigenous Biodiversity	ECO - P9	Support		Retain
Federated Farmers of New Zealand (S524)	S524.064	Ecosystems and Indigenous Biodiversity	ECO - P9	Not Stated	Offsets should be enabled where feasible and practical, and not be a requirement in all circumstances, as there may be	Amend policy as follows: <del>Provide for</del> <b>Enable</b> biodiversity offsets <del>and compensation</del> to manage residual adverse effects

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					circumstances where offsetting is likely to be neither practical or achievable. 'No net loss' and 'Net gain' is too difficult to quantify, and is unworkable as a method of compliance 'Best practice' is a nebulous and open-ended concept.	of an activity where: <del>The goal of the biodiversity offsets is no net loss and, preferably, a net gain of biodiversity;</del> The conservation outcomes <b>of biodiversity offsets</b> are measurable and positive; <del>and The biodiversity offsets or compensation are in accordance with best practice, including but not limited to NZ Government guidance on biodiversity offsetting.</del>
Neil Mouat (S535)	S535.013	Ecosystems and Indigenous Biodiversity	ECO - P9	Support	We support this policy.	Retain as notified.
Neil Mouat (S535)	S535.016	Ecosystems and Indigenous Biodiversity	ECO - P9	Support	We support this policy.	Retain as notified.
Straterra (S536)	S536.022	Ecosystems and Indigenous Biodiversity	ECO - P9	Support	We note and support the consenting pathway for mineral extraction in ECO-P9 and P9 including the allowance for compensation.	Retain as notified
Terra Firma Mining Limited (S537)	S537.013	Ecosystems and Indigenous Biodiversity	ECO - P9	Support	Biodiversity offsets and compensation are legitimate approaches to mana	Retain ECO-P9
Buller District Council (S538)	S538.205	Ecosystems and Indigenous Biodiversity	ECO - P9	Support	Council supports these policies	Retain as notified.
Westpower Limited (S547)	S547.257	Ecosystems and Indigenous Biodiversity	ECO - P9	Amend	Should be consistent with, and give effect to the RPS.	Reword items a.-c. to be consistent with and give effect to Policies 4 and 5, Chapter 7, of the RPS.
Buller Conservation Group (S552)	S552.072	Ecosystems and Indigenous Biodiversity	ECO - P9	Amend		Provide for biodiversity offsets and compensation to manage residual adverse effects of an activity <b>where any attempt to avoid, remedy or mitigate adverse effects has failed where:</b>

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Frida Inta (S553)	S553.072	Ecosystems and Indigenous Biodiversity	ECO - P9	Amend		Provide for biodiversity offsets and compensation to manage residual adverse effects of an activity <b>where any attempt to avoid, remedy or mitigate adverse effects has failed where:</b>
Chris & Jan Coll (S558)	S558.097	Ecosystems and Indigenous Biodiversity	ECO - P9	Support		REtain
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.209	Ecosystems and Indigenous Biodiversity	ECO - P9	Amend	This policy does not give effect to the WCRPS.	Delete ECO - P9, Replace with the exact wording of Policy 2, 3, 4 and 5, Chapter 7 of the WCRPS or incorporate those policies by reference.
Geoff Volckman (S563)	S563.027	Ecosystems and Indigenous Biodiversity	ECO - P9	Support	We support this policy	Retain
Catherine Smart-Simpson (S564)	S564.032	Ecosystems and Indigenous Biodiversity	ECO - P9	Support		Retain
Chris J Coll Surveying Limited (S566)	S566.097	Ecosystems and Indigenous Biodiversity	ECO - P9	Support		REtain
William McLaughlin (S567)	S567.179	Ecosystems and Indigenous Biodiversity	ECO - P9	Support		REtain
Minerals West Coast (S569)	S569.008	Ecosystems and Indigenous Biodiversity	ECO - P9	Support	Operators can manage these effects under the effects management hierarchy.	Retain
Laura Coll McLaughlin (S574)	S574.097	Ecosystems and Indigenous Biodiversity	ECO - P9	Support		REtain
Brian Anderson (S576)	S576.015	Ecosystems and Indigenous Biodiversity	ECO - P9	Support		Retain
Koiterangi Lime Co LTD (S577)	S577.039	Ecosystems and Indigenous Biodiversity	ECO - P9	Support		Retain



Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Birchfield Coal Mines Ltd (S601)	S601.039	Ecosystems and Indigenous Biodiversity	ECO - P9	Support	Recognises the need to provide for offsetting or compensation	Retain as notified.
Department of Conservation (S602)	S602.073	Ecosystems and Indigenous Biodiversity	ECO - P9	Amend	Amend Policy ECO-PC9 as offsetting and compensation should not be 'provided for', and instead should only be allowed where the effects management hierarchy has been applied, and where a net gain can be achieved.	Amend: <del>Provide for</del> <b>Allow for</b> biodiversity offsets and compensation to manage residual adverse effects of an activity where: a. The goal of the biodiversity offsets is <del>no net loss and, preferably,</del> a net gain of biodiversity; <b>b. Where a biodiversity offset is proposed it must be based upon measured biodiversity losses and contain a quantitative loss and gain calculation that demonstrates a net gain;</b> c. The conservation outcomes are measurable, <del>and</del> positive <b>and in addition to outcomes that would have occurred in the absence of the offset;</b> and d. The biodiversity offsets or compensation are in accordance with best practice, including but not limited to NZ Government guidance on biodiversity offsetting.
BRM Developments Limited (S603)	S603.028	Ecosystems and Indigenous Biodiversity	ECO - P9	Support	Recognises the need to provide for offsetting or compensation to deal with residual adverse effects	Retain as notified.
Birchfield Ross Mining Limited (S604)	S604.033	Ecosystems and Indigenous Biodiversity	ECO - P9	Support	Recognises the need to provide for offsetting or compensation	Retain as notified.
Phoenix Minerals Limited (S606)	S606.028	Ecosystems and Indigenous Biodiversity	ECO - P9	Support	Recognises the need to provide for offsetting or compensation	Retain
Whyte Gold Limited (S607)	S607.028	Ecosystems and Indigenous Biodiversity	ECO - P9	Support	Recognises the need to provide for offsetting or compensation	Retain as notified.
Grey District Council (S608)	S608.053	Ecosystems and Indigenous Biodiversity	ECO - P9	Support	Gives effect to Policies of the West Coast RPS.	Retain as notified

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Avery Brothers (S609)	S609.037	Ecosystems and Indigenous Biodiversity	ECO - P9	Support	We support this policy.	retain
Karamea Lime Company (S614)	S614.048	Ecosystems and Indigenous Biodiversity	ECO - P9	Support		Retain
Peter Langford (S615)	S615.048	Ecosystems and Indigenous Biodiversity	ECO - P9	Support		Retain
David Moore (S65)	S65.015	Ecosystems and Indigenous Biodiversity	ECO - P10	Support		Retain
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.325	Ecosystems and Indigenous Biodiversity	ECO - P10	Support	We support this policy.	Retain policy.
West Coast Penguin Trust (S275)	S275.014	Ecosystems and Indigenous Biodiversity	ECO - P10	Support	ECO-P10: Protect indigenous biodiversity in the coastal environment from inappropriate subdivision, use and development by: We welcome and support this policy. We recommend the inclusion of a reference to the Te Mana o te Taiao - Aotearoa New Zealand Biodiversity Strategy 2020 and ensure objectives, policies and rules support its implementation. The Implementation Plan of the ANZBS2020 assigns specific responsibilities to local authorities and these responsibilities need to be reflected in the TTPP.	Amend to include reference to the Te Mana o te Taiao - Aotearoa New Zealand Biodiversity Strategy 2020 and ensure objectives, policies and rules support its implementation
Laura Garber (S278)	S278.006	Ecosystems and Indigenous Biodiversity	ECO - P10	Support	Sea level rise and erosion are only beginning to show along the coast and already the effects are harrowing. Protect indigenous biodiversity in the coastal environment from inappropriate subdivision, use and development and negate any resource consents for mineral extraction on coastal, low lying land.	Protect indigenous biodiversity in the coastal environment from inappropriate subdivision, use and development and negate any resource consents for mineral extraction on coastal, low lying land

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Waka Kotahi NZ Transport Agency (S450)	S450.086	Ecosystems and Indigenous Biodiversity	ECO - P10	Support in part	Waka Kotahi supports the protection of indigenous biodiversity where inappropriate subdivision, use and development either avoids, remedy's or mitigates adverse effects on indigenous biodiversity (vegetation, habitats, and species). It appears that the policy 'doubles-up' on P10.a and P.10.b. It is recommended that the policy be amended to remove the double up and provide the option to avoid, remedy or mitigate any adverse effects.	Amend the policy as follows: Protect indigenous biodiversity in the coastal environment from riate subdivision, use and development by: <del>Avoiding adverse effects on significant indigenous biodiversity; and</del> <del>a</del> Avoiding, remedying, or mitigating <del>other</del> adverse effects on indigenous vegetation, habitats, and species within the coastal environment.
TiGa Minerals and Metals Limited (S493)	S493.053	Ecosystems and Indigenous Biodiversity	ECO - P10	Amend	To fully give effect to Policy 9.1 of the West Coast Regional Policy Statement.	Amend ECO - P9 as follows: Protect indigenous biodiversity in the coastal environment from inappropriate subdivision, use and development by: a. ... b. Avoiding, remedying or mitigating <del>other</del> <b>significant</b> adverse effects on <b>other</b> indigenous vegetation, habitats and species within the coastal environment.
Steve Croasdale (S516)	S516.039	Ecosystems and Indigenous Biodiversity	ECO - P10	Support		Retain
Buller District Council (S538)	S538.206	Ecosystems and Indigenous Biodiversity	ECO - P10	Support	Council supports these policies	Retain as notified.
Westpower Limited (S547)	S547.258	Ecosystems and Indigenous Biodiversity	ECO - P10	Amend	Not the appropriate location for this policy.	Delete policy ECO-P10 and relocate to the Coastal Environment Section.
Buller Conservation Group (S552)	S552.073	Ecosystems and Indigenous Biodiversity	ECO - P10	Amend	there is an overlap with ECO - P8 (c)	Amend duplication
Frida Inta (S553)	S553.073	Ecosystems and Indigenous Biodiversity	ECO - P10	Amend	there is an overlap with ECO - P8 (c)	Amend to address overlap
Chris & Jan Coll (S558)	S558.099	Ecosystems and Indigenous Biodiversity	ECO - P10	Support		REtain

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Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.210	Ecosystems and Indigenous Biodiversity	ECO - P10	Oppose	To the extent that Appendix 1 criteria of the WCRPS could be broader than Policy 11 matters, other ECO provisions must also be applied in the coastal environment in the absence of policy direction avoiding significant adverse effects.	Add the WCRPS definition for "Significant indigenous biological diversity". Ensure that the term as used in ECO-P10 is hyperlinked to the definition.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.480	Ecosystems and Indigenous Biodiversity	ECO - P10	Amend	ECO-P10 uses the term "significant indigenous biodiversity" however this term is not defined in the Plan.	Amend: Protect indigenous biodiversity in the coastal environment <del>from inappropriate subdivision, use and development</del> by: a. Avoiding adverse effects on significant indigenous <b>biological</b> diversity <b>in accordance with Policy 11 NZCPS</b> ; and b. <b>In addition to P2, P3, P6, P7, P8</b> Avoiding, remedying or mitigating other adverse effects on indigenous vegetation, habitats, and species within the coastal environment.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.481	Ecosystems and Indigenous Biodiversity	ECO - P10	Amend	Alternative relief if not all Policy 11 NZCPS matters are captured by "significant indigenous biological diversity", amend Policy ECO-P10 as follows	Amend: Protect indigenous biodiversity in the coastal environment <b>in accordance with policy 11 NZCPS</b> <del>from inappropriate subdivision, use and development</del> by: a. Avoiding adverse effects on significant indigenous <b>biological</b> diversity; and b. <b>Avoiding significant adverse effects and</b> <del>A</del> avoiding, remedying or mitigating other adverse effects on indigenous vegetation, habitats, and species within the coastal environment.
Geoff Volckman (S563)	S563.028	Ecosystems and Indigenous Biodiversity	ECO - P10	Support		Retain
Catherine Smart-Simpson (S564)	S564.033	Ecosystems and Indigenous Biodiversity	ECO - P10	Support		Retain
Chris J Coll Surveying Limited (S566)	S566.099	Ecosystems and Indigenous Biodiversity	ECO - P10	Support		REtain

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
William McLaughlin (S567)	S567.180	Ecosystems and Indigenous Biodiversity	ECO - P10	Support		REtain
Laura Coll McLaughlin (S574)	S574.099	Ecosystems and Indigenous Biodiversity	ECO - P10	Support		REtain
Koiterangi Lime Co LTD (S577)	S577.040	Ecosystems and Indigenous Biodiversity	ECO - P10	Support		Retain
WMS Group (HQ) Limited and WMS Land Co. Limited (S599)	S599.057	Ecosystems and Indigenous Biodiversity	ECO - P10	Amend	Requires amendment to fully give effect to Policy 9.1 of the West Coast Regional Policy Statement.	Amend ECO - P9 as follows: Protect indigenous biodiversity in the coastal environment from inappropriate subdivision, use and development by:  a. Avoiding adverse effects on significant indigenous biodiversity; and b. Avoiding, remedying or mitigating <del>other</del> <b>significant</b> adverse effects on <del>other</del> indigenous vegetation, habitats and species within the coastal environment
Department of Conservation (S602)	S602.074	Ecosystems and Indigenous Biodiversity	ECO - P10	Amend	Amend Policy ECO-PC10 so it is consistent with the NZCPS, and applies the effects management hierarchy to appropriately manage adverse effects on biodiversity in the coastal environment.	Amend: Protect indigenous biodiversity in the coastal environment from inappropriate subdivision, use and development by: <b>a. Avoiding adverse effects on indigenous biodiversity set out in Policy 11(a) of the NZCPS, and</b> <del>significant</del> <b>b. Avoiding significant adverse effects on significant indigenous biodiversity; and</b> c. Avoiding, remedying or mitigating other adverse effects on indigenous vegetation, habitats and species within the coastal environment <b>in accordance with the effects management hierarchy and Policy 11(b) of the NZCPS.</b>
Grey District Council (S608)	S608.054	Ecosystems and Indigenous Biodiversity	ECO - P10	Support	Gives effect to Policies of the West Coast RPS.	Retain as notified

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Karamea Lime Company (S614)	S614.049	Ecosystems and Indigenous Biodiversity	ECO - P10	Support		Retain
Peter Langford (S615)	S615.049	Ecosystems and Indigenous Biodiversity	ECO - P10	Support		Retain
Inger Perkins (S462)	S462.008	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity Rules	Amend	This chapter needs to emphasise the value of lowland forest ecosystems, which are underrepresented and easily lost or diminished through permitted clearance rules. The vast majority of public conservation land managed by the Department of Conservation is on steep slopes and/or in alpine areas, rarely including such precious lowland forest. Clearance of 5000m <sup>2</sup> /3 years could mean death by a thousand cuts to lowland forest remnants. Such permitted activity has no justification in the context of protecting indigenous vegetation and habitat as required by section 6 of the RMA - "areas of significant indigenous vegetation and significant habitats of indigenous fauna are protected".	Reduce the area of Permitted Activity clearance and specifically better protect lowland forest ecosystems. Include stronger provisions to protect more valuable/under-represented areas
Katherine Gilbert (S473)	S473.003	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity Rules	Oppose	It's great that we have the nations remaining large areas of Conservation Land and the last remaining wetlands, Kahikatea forests and significant Coastal areas. These are assets and need protecting for their national and international significance, indigenous biodiversity and natural landscape values.	Amend plan to ensure there is a rule framework that protects the biodiversity of Significant Natural Areas that have not yet been identified and mapped in the Plan. Ensuring that such biodiversity has the same level of protection as the SNAs listed in Schedule Four
Katherine Gilbert (S473)	S473.016	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity Rules	Amend	Buller and Westland have not identified SNAs so the rules in these districts needs to be more restrictive over activities and their effects on the environment. If this doesn't happen then to maintain One	Make the rules for vegetation clearance more restrictive in Buller and Westland districts.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					Plan, Buller and Westland need to carry out an SNA identification process.	
Lynley Hargreaves (S481)	S481.020	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity Rules	Oppose	The TTPP weakens protection for indigenous vegetation, by failing to have adequate rules to protect indigenous vegetation in the ECO chapter. In terms of climate change, ALL native forest is now important, and should only be destroyed after careful consideration. I do not believe that SNA identification in the Grey district meets current WCRPS criteria. Nor do I believe it covered conservation land. This means that there are large areas of important forest unprotected by the district plan in the Grey district.	Revise the rules so that all districts have stronger general vegetation clearance rules with anything more than very small and necessary clearance treated as a discretionary activity. I also submit that any indigenous vegetation clearance carried out under any permitted activity rules needs to be actively monitored by councils.
Aggregate and Quarry Association (S521)	S521.001	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity Rules	Amend	Inconsistent with the principle of mitigating, offsetting or compensating environmental effects	Amend to use the effects hierarchy from the WCRPS as a template for the vegetation clearance rules
Straterra (S536)	S536.008	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity Rules	Oppose	A major concern with the proposed plan relates to the impact of SNAs in the transition period between the plan being notified and when it becomes fully operative. Specifically, the SNA, and other overlay provisions have immediate legal effect since notification but the enabling provisions, both in the mining zones and outside, will not become operative until decisions are made much later. This will clearly cause problems for consent applications in that interim period.	Amend so ecosystems and biodiversity provisions do not have legal effect until the plan is operative
Straterra (S536)	S536.020	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity Rules	Amend	The vegetation clearance rules in the Ecosystems and Indigenous Biodiversity chapter are complicated and fragmented and cause some difficulty. Given the WCRPS is a relatively recent regional policy statement, and its status, i.e. it is a	Use the biodiversity management hierarchy from the West Coast Regional Policy Statement (WCRPS) as a template for the vegetation clearance rules.

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					requirement of the district plan to give effect to it, it makes sense to use the WCRPS's biodiversity management hierarchy in this way	
Buller District Council (S538)	S538.208	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity Rules	Not Stated	Insert a new permitted activity rule to allow for vegetation removal in the Buller and Westland Districts outside of an SNA. This will allow for the status quo until such time as SNAs are identified and inserted into Schedule 4. Once SNAs have been scheduled, the new rule will also allow indigenous vegetation clearance in circumstances where it is outside a scheduled SNA.	<p><b>Indigenous vegetation clearance and disturbance outside of SNAs within the Buller and Westland Districts.</b></p> <p><b>1. It is outside of a scheduled Significant Natural Area as identified in Schedule 4; 2.It is the removal or clearance of manuka, kanuka and bracken only that is not part of any wetland and which is under 15 years old, not exceeding 5ha per site over any continuous three year period, subject to provision of notice to the relevant District Council at least 20 working days prior to the proposed clearance including:</b></p> <p><b>(a) Details of the location of the proposed clearance;</b></p> <p><b>(b) Area of the proposed clearance; and</b></p> <p><b>(c) Verification by documentary, photographic or other means the vegetation is less than 15 years old and not part of any wetland; or</b></p> <p><b>3.It is maximum area of 5,000m<sup>2</sup> per site, in total, over any continuous three year period.</b></p>
Buller Conservation Group (S552)	S552.062	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity Rules	Amend	There needs to be restrictions on signage in areas of high natural value.	add additional provision
Frida Inta (S553)	S553.062	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity Rules	Amend	There needs to be restrictions on signage in areas of high natural value.	add additional provision
Royal Forest and Bird Protection Society of New	S560.010	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous	Amend	In the meantime, identification, and mapping of SNAs is proposed to be	Include a general consent requirement for all indigenous vegetation clearance to undertake an ecological assessment as part of the consent



Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Zealand Inc. (Forest & Bird) (S560)			Biodiversity Rules		undertaken through a resource consent process.	application applying the significance criteria in Appendix 1 of the WCRPS. Where Significant Natural Areas are determined, including those in Schedule Four, manage all vegetation clearance within those areas through discretionary or non-complying rules.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.024	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity Rules	Amend	Coal, gold, and gravel extraction has adverse and often irreversible effects on indigenous vegetation and habitats of indigenous fauna, including in some cases total loss.	Amend the Plan so that vegetation clearance for mineral extraction within any significant natural area(s) is at least a non-complying activity.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.212	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity Rules	Amend	The Plan currently does not protect significant habitats of indigenous fauna where they occur outside indigenous vegetation. This is in the context of this Plan not having identified SNAs.	As noted above in the Key Issues, we have not been able to suggest a satisfactory amendment to ensure that significant habitats outside of indigenous vegetation are protected. As such, we seek that the Council provide new rules to ensure that this occurs.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.213	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity Rules	Support	It is helpful to include note for consideration of policy that is relevant to activities which are specifically considered in the ECO rules.	Retain the note to refer to policies in the Energy, Infrastructure and Transport chapters
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.224	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity Rules	Amend	For the reasons set out in respect of ECO-R7 above.	As sought with respect to amendments on ECO- R7, add a new ECO - Noncomplying rule for vegetation clearance not meeting new rule ECO - R7A as well as for vegetation clearance within Significant Natural Areas (including Schedule Four areas) for activities that are not specifically provided for in other ECO rules
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.483	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity Rules	Amend	Consequential amendment	Rules may also need to be included in other chapters to ensure that significant habitats outside of indigenous vegetation are protected.

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Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.493	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity Rules	Amend	Consequential amendment	Add a new ECO Controlled activity rule for building platform and access on existing site at the date the Plan becomes operative, within residential zones. Where indigenous vegetation clearance is for the purpose of the establishment of a building platform and access to an existing building site where there is no existing residential building. Ensure this rule applies both outside and within the CE and within residential zones. Matters of control to include effects on indigenous biodiversity and protect any significant natural area(s).
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.503	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity Rules	Amend	For activities that may be appropriate but of a larger scale than proved for as permitted or restricted discretionary, a full discretionary status rule is appropriate to provide for a full assessment of effects.	Add a new Discretionary rule as follows: <b>ECO - R7A Vegetation clearance within a Significant Natural Area(s), including indigenous vegetation clearance not meeting ECO - R5Activity Status Discretionary Where:1. The vegetation clearance is within a SNA identified in Schedule Four, or2. An assessment in accordance with Appendix 1 of the WCRPS demonstrates that the clearance or disturbance is within a Significant Natural Area(s), and3. the activity is for the purposes specified in Conditions 1 to 3 of ECO - R5Advice Note:1. Where assessing resource consents for indigenous vegetation clearance under this rule, assessment against the policies of both the Ecosystems and Biodiversity Chapter and Natural Features and Landscapes Chapters will be required.2. This rule also applies to Plantation forestry activities, where this provision is more stringent than the NES - PF.Activity status where compliance not achieved: Non-complying under ECO - R8A</b>

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Brian Anderson (S576)	S576.013	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity Rules	Amend	Bewildering array of permitted and controlled rules for indigenous vegetation clearance	Amend indigenous vegetation clearance rules to discretionary activity
Michael Orchard (S583)	S583.002	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity Rules	Amend	The plan should approve indigenous production forestry, where determined under the national rules set by MPI (we have a sizeable number)	Rely on MPI Indigenous forestry rules to manage indigenous production forestry on the West Coast.
Department of Conservation (S602)	S602.010	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity Rules	Amend	For all rules that relate to the removal of indigenous vegetation, include an advice note to make it explicit that SNAs include all areas that meet the significance criteria, and not only those that are mapped.	Add the following advice note:  <b>For the avoidance of doubt, any area that meets the criteria set out in Appendix 1 of the West Coast Regional Policy Statement (until such time as nationally consistent criteria apply through a National Policy Statement or National Environmental Standards) is a Significant Natural Area.</b>
Avery Brothers (S609)	S609.038	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity Rules	Support	Request that provision is made for low-level clearance for building sites within SNAs (including for future/not yet approved subdivisions)	Amend wording to provide for building sites where these types of living options can facilitate predator and pest management and control
Rebecca Inwood (S422)	S422.001	Ecosystems and Indigenous Biodiversity	Permitted Activities	Oppose	While I support the permitted activity rules for indigenous vegetation clearance in the Buller District, I am concerned that there is no permitted provision once SNAs are identified and scheduled. The rules framework needs to be reviewed.	Review the rules framework so that when SNAs are identified and scheduled in Buller there remain Permitted Activity provisions.
Steve Croasdale (S516)	S516.040	Ecosystems and Indigenous Biodiversity	Permitted Activities	Amend	I believe this is too restrictive.	Amend to be more enabling of development.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.215	Ecosystems and Indigenous Biodiversity	Permitted Activities	Amend	Due to the lack of SNAs comprehensively identified, scheduled, and mapped in the Plan, Forest & Bird considers that indigenous vegetation clearance must be treated as if it were occurring within an SNA. The type of activities needs to be limited to those that may be appropriate as permitted within an SNA, and to a	Make amendments to address submission. We have sought rules below which attempt to fix this.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					scale that ensures the SNA is protected and that adverse effects are no more than minor. For clarity we consider that separate rules should be used for activities outside of Schedule Four SNAs to those within Schedule Four SNAs. Within the CE even more stringent conditions are required to ensure that the policies direction to avoid adverse effects is achieved.	
Geoff Volckman (S563)	S563.029	Ecosystems and Indigenous Biodiversity	Permitted Activities	Amend	We believe this is too restrictive.	Amend to be more enabling of development.
William McLaughlin (S567)	S567.181	Ecosystems and Indigenous Biodiversity	Permitted Activities	Amend	We believe this is too restrictive.	Amend to be more enabling of development.
William McLaughlin (S567)	S567.183	Ecosystems and Indigenous Biodiversity	Permitted Activities	Amend	that provision is made for low-level clearance for building sites.	Amend wording to provide for building sites.
Greg Maitland (S571)	S571.013	Ecosystems and Indigenous Biodiversity	Permitted Activities	Amend	Until such time as meaningful compensation for "confiscation" of land is implemented.	I would like to see a policy change where land clearance/ disturbance is based on a percentage of area of the total land.
Brian Anderson (S576)	S576.009	Ecosystems and Indigenous Biodiversity	Permitted Activities	Oppose	indigenous vegetation clearance will result in irrecoverable carbon release.	Delete
New Zealand Agricultural Aviation Association (S166)	S166.015	Ecosystems and Indigenous Biodiversity	ECO - R1	Amend	NZAAA submits that limiting native vegetation clearance in improved pastures would adversely affect the viability of rural production land.	<b>Delete ECO--R1 5 (i) and (ii) and replace them with:</b> 5. Within the Buller and Westland Districts: <b>Indigenous vegetation clearance where it is within an area of improved pasture</b>
New Zealand Agricultural Aviation Association (S166)	S166.016	Ecosystems and Indigenous Biodiversity	ECO - R1	Amend	NZAAA seeks to have the clearance of native vegetation in improved pastures added as a permitted activity in the Westland and Buller districts.	<b>Delete Advice Note item #1</b>
Te Mana Ora (Community and Public Health) of the	S190.326	Ecosystems and Indigenous Biodiversity	ECO - R1	Support	We support this rule.	Retain rule.

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NPHS/ Te Whatu Ora (S190)						
Transpower New Zealand Limited (S299)	S299.075	Ecosystems and Indigenous Biodiversity	ECO - R1	Amend	<p>There is some crossover between 3(ii) and 3(ix), as both could apply to the operation of the National Grid. Transpower requests deletion of (ix), and amendments to (ii) to incorporate the National Grid and provide consistency with ECO-R2. The basis for the application of clause 3.(ix) to the National Grid is not clear. It is unclear whether permitted activity conditions 1-5 all apply, or an activity only needs to comply with 1. 'And' or 'or' should be inserted at the end of, or between, conditions 1-5 so it is clear if any or all of them must apply for an activity to be permitted. Specific to the National Grid, the NESETA manages the trimming, felling and removal of vegetation and earthworks, with the activity status under the NESETA determined by the provisions in the Proposed TTPP. The NESETA provides for earthworks and trimming, felling or removal of any vegetation as permitted activities subject to conditions. Therefore, the NESETA would prevail over this rule for operation, maintenance, upgrading or removal of a transmission line. ECO-R1 would remain applicable for installation.</p>	<p>Amend the rule as follows: ECO - R1 - Indigenous vegetation clearance and disturbance outside of the coastal environment ... ii. The maintenance, operation, <del>and</del> repair, <b>upgrading and installation</b> of lawfully established tracks, fences, structures, buildings, critical infrastructure <b>including the National Grid</b>, network utilities, renewable electricity generation activities or natural hazard mitigation activities; ... <del>ix. For construction or operation of an above ground or below ground network utility or the national grid</del> National Grid where: <del>The construction corridor does not exceed 3m in width; and All machinery used in construction is cleaned and made free of weed material and seeds prior to entering the site; and Rehabilitation of disturbed areas is undertaken following the completion of construction;</del> Add 'and' or 'or' between conditions 1-5, or otherwise more clearly describe the activity status that applies to each non-compliance. The text in 'activity status where compliance not achieved' appears to have some errors and it does not clearly direct the plan user to an activity status</p>
Lynne Lever & Greg Tinney (S320)	S320.003	Ecosystems and Indigenous Biodiversity	ECO - R1	Amend	<p>Indigenous vegetation clearance and disturbance outside of the coastal environment ECO Rules 1 needs clarification regarding permitted activities and clearance areas. There is conflicting interpretation and information circulating. eg Section 5.ii allows Westland</p>	Clarification regarding permitted activities and clearance areas

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					landowners 5000m2 of clearance/ disturbance per 3 years however some planners have interpreted this as only being permitted for those activities listed in section 3.	
Tony Schroder (S343)	S343.004	Ecosystems and Indigenous Biodiversity	ECO - R1	Amend	Needs clarification and amendment re Permitted Activities and Clearance areas	Clarify the rule and make it less restrictive for freehold rural landowners. Provide for basic West Coast landowner/homesteading activities.
Emi Schroder (S369)	S369.003	Ecosystems and Indigenous Biodiversity	ECO - R1	Oppose	ECO Rules 1 and 2 need amendment and clarification regarding permitted activities and clearance areas. ECO rule 2 is particularly harsh and restrictive for free hold rural landowners in the coastal environment. There is no clear provision in the permitted activities list for many basic west coast landowner/ homesteading activities.	Review ECO R1 to be less restrictive for landowners and make provision in the permitted activities list for many basic west coast landowner/homesteading activities.
Anne Chapman (S425)	S425.008	Ecosystems and Indigenous Biodiversity	ECO - R1	Support	I agree with permitted activities for the extraction of wind blown timber as stated, this resource is wizey used in the furniture manufacturing industry, i watch the large furniture vans leaving town twice a week supplying furniture to the whole of New Zealand well done that business.	Support Permitted Activity for extraction of wind thrown timber.
Manawa Energy Limited (Manawa Energy) (S438)	S438.081	Ecosystems and Indigenous Biodiversity	ECO - R1	Support in part	To ensure consistency with other comments, Manawa requests that this rule makes provision for existing renewable electricity generation activities and temporary energy activities. It also seeks that the policy clearly indicates that the various sub clauses of clause (iii) are exclusive.	Amend ECO - R1 (3)(ii) and (iii) as follows: i. The maintenance, operation, <b>upgrading</b> and repair of lawfully established tracks, fences, structures, buildings, <b>regionally significant critical</b> infrastructure, network utilities, renewable electricity generation activities or natural hazard mitigation activities, <b>or</b> iii. For the installation of temporary <b>electricity generation activities or</b> network activities following a regional or local state of emergency declaration, <b>or</b> ...

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Te Tumu Paeroa - The office of the Māori Trustee (S440)	S440.027	Ecosystems and Indigenous Biodiversity	ECO - R1	Support in part	<p>The Māori Trustee is generally comfortable with the rules in the 'Ecosystem and Indigenous Biodiversity' chapter.</p> <p>The Māori Trustee notes that, in terms of ECO R1(3)(xi), it is difficult to form a position when the contents of the iwi management plans are not currently known or available.</p> <p>The Māori Trustee considers that the age requirement of vegetation (to be under 15 years old) in rule ECO R1(5)(i), to permissively clear mānuka, kānuka and bracken outside the coastal environment, will likely disadvantage Māori land. Whenua Māori is historically underdeveloped and is more likely to have vegetation that is older than 15 years old on it than not. To avoid exacerbating historical inequities and unintentionally disadvantaging Māori land it is recommended that an exclusion for Māori land should be footnoted or acknowledged in ECO R1(5)(i).</p> <p>ECO-R1 also does not currently provide for indigenous vegetation clearance and disturbance outside of the coastal environment for biosecurity reasons, such as the clearance of mānuka or kānuka that are infected with myrtle rust.</p>	<p>The Māori Trustee considers a footnote should accompany ECO R1(5)(i) to provide exceptions for Māori landowners to clear mānuka, kānuka and bracken outside the coastal environment that are older than 15 years.</p> <p>ECO-R1 should also provide for the clearance and disturbance of indigenous vegetation for biosecurity reasons.</p>
Silver Fern Farms Limited by its authorised agents Mitchell Daysh Limited (S441)	S441.017	Ecosystems and Indigenous Biodiversity	ECO - R1	Support	Silver Fern Farm agrees that the proposed permitted activity performance standards for indigenous vegetation clearance are appropriate.	Retain as notified,

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KiwiRail Holdings Limited (S442)	S442.051	Ecosystems and Indigenous Biodiversity	ECO - R1	Support	KiwiRail supports the rule which acknowledges the need to operate, repair and maintain infrastructure where it has been lawfully established as a permitted activity.	Retain as proposed
Suzanne Hills (S443)	S443.027	Ecosystems and Indigenous Biodiversity	ECO - R1	Amend	This rule for Grey District leaves significant indigenous vegetation at risk from clearance since there remain areas that have not been identified as either SNAs or ONLs. The clearance rule for Buller and Westland does not exclude Outstanding Natural Landscapes, even though they have been identified for these districts and are listed in Schedule 5. This is regionally inconsistent and inappropriate for a combined district plan. For Buller and Westland where SNAs have not been identified and will not be complete until 2027, the clearance rule of 0.5ha/site/3 years (outside of the Coastal Environment) leaves biodiversity at risk. The blanket rule of 0.5ha/3 years (and 5ha/site/3 yrs for manuka, kanuka and bracken	Amend rule to remove exclusions for Grey District, ensure ONLS in Buller and Westland are included, and reduce the blanket provision for permitted clearance of 0.5ha/3 years (and 5ha/site/3 yrs for manuka, kanuka and bracken
Suzanne Hills (S443)	S443.028	Ecosystems and Indigenous Biodiversity	ECO - R1	Oppose in part	With the mandate to protect biodiversity the sanctioning of vegetation clearance to aid the removal of windthrown timber is not justified.	Delete 3.i - the provision that allows for the removal of wind thrown timber.
Clare Backes (S444)	S444.008	Ecosystems and Indigenous Biodiversity	ECO - R1	Amend	Clearance outside of significant natural area as listed in Schedule 4 is a permitted activity - this relates only to the Grey District, and other areas of significant indigenous vegetation exist which are not listed in Schedule 4. This needs to be a discretionary activity, so that the indigenous vegetation can be assessed.	Amend rule so that all vegetation clearance is a discretionary activity.



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Clare Backes (S444)	S444.009	Ecosystems and Indigenous Biodiversity	ECO - R1	Amend	Windthrown timber should not be removed when it entails the destruction of indigenous vegetation	Remove 3.i. in relation to wind thrown timber.
Clare Backes (S444)	S444.010	Ecosystems and Indigenous Biodiversity	ECO - R1	Oppose	Clearance of 5ha of mānuka, kānuka and bracken over 3 years would stop any native forest from regeneration. All these 3 species form ideal nursery conditions for seeds and the areas should be left to regenerate naturally. The more "old-fashioned" view of these species is that they are scrub - that is untrue, they are valuable in their own right and as the initiators of regeneration of forests. These areas act as an important carbon sink and must be encouraged.	Delete the permitted activity provision to allow clearance of 5ha of mānuka, kānuka and bracken over 3 years
Waka Kotahi NZ Transport Agency (S450)	S450.087	Ecosystems and Indigenous Biodiversity	ECO - R1	Support	Waka Kotahi supports the permitted activity rule for Indigenous vegetation clearance and disturbance outside of the coastal environment as it provides for the maintenance, operation and repair of lawfully established structures and critical infrastructure or natural hazard mitigation activities; provides for the installation of temporary network activities following a regional or local state of emergency declaration; prevention of serious threats to structures or services; ensures the safe and efficient operation (including maintenance and repair) of any formed public road or access.	Retain as proposed
Horticulture New Zealand (S486)	S486.030	Ecosystems and Indigenous Biodiversity	ECO - R1	Support in part	HortNZ seeks that there is provision to clear vegetation for biosecurity purposes, such as an incursion of an unwanted organism under the Biosecurity Act 1993.	Amend ECO-R1 by adding to 3) xiii) removal of vegetation for biosecurity purposes when required under the Biosecurity Act 1993.  Amend 5) i) to provide for clearance of manuka, kanuka or bracken for food production with no

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						site size limitation.
West Coast Regional Council (S488)	S488.003	Ecosystems and Indigenous Biodiversity	ECO - R1	Amend	Rule NC - R1 permits indigenous vegetation clearance and earthworks specifically for environmental monitoring facilities within the margins of waterways. However, the permitted Rules ECO - R1 and R2 for indigenous vegetation clearance outside of, and within, the coastal environment respectively do not refer to environmental monitoring facilities. There seems to be a disconnect between these Rules. R1 Condition 3ii refers to "critical infrastructure", and it would provide consistency if either environmental monitoring facilities are added to ECO - R1 and R2, or environmental monitoring facilities are added to the definition of "critical infrastructure". Flood warning data transmitted via hydrology monitoring structures is critical for Civil Defence planning and response.	"environmental monitoring facilities" are added to permitted Rule ECO - R1
Bathurst Resources Limited and BT Mining Limited (S491)	S491.018	Ecosystems and Indigenous Biodiversity	ECO - R1	Amend	To acknowledge the lawfully established activities.	Amend: 1. ... 3. It is necessary for one of the following purposes: <b>i. It is an anticipated activity within the following zones, BCZ or MINZ; or ...</b>
Bathurst Resources Limited and BT Mining Limited (S491)	S491.019	Ecosystems and Indigenous Biodiversity	ECO - R1	Amend	where there is a functional or operational need for an activity to occur there.	1. ... 3. It is necessary for one of the following purposes: <b>i. ... ii. There is a functional or operational need; or iii. ....</b>
TiGa Minerals and Metals Limited (S493)	S493.054	Ecosystems and Indigenous Biodiversity	ECO - R1	Support	Provides for a number of vegetation clearance activities and the unique context.	Retain as notified.
Leonie Avery (S507)	S507.039	Ecosystems and Indigenous Biodiversity	ECO - R1	Oppose in part	We request that provision is made for low-level clearance for building sites within SNAs (including for future/not yet	Amend wording to provide for building sites.

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					approved subdivisions). Providing for these types of living options can actually facilitate predator and pest management and control and is an important lifestyle option for the region.	
Jared Avery (S508)	S508.039	Ecosystems and Indigenous Biodiversity	ECO - R1	Oppose in part	We request that provision is made for low-level clearance for building sites within SNAs (including for future/not yet approved subdivisions). Providing for these types of living options can actually facilitate predator and pest management and control and is an important lifestyle option for the region.	Amend wording to provide for building sites.
Kyle Avery (S509)	S509.039	Ecosystems and Indigenous Biodiversity	ECO - R1	Oppose in part	We request that provision is made for low-level clearance for building sites within SNAs (including for future/not yet approved subdivisions). Providing for these types of living options can actually facilitate predator and pest management and control and is an important lifestyle option for the region.	Amend wording to provide for building sites.
Avery Bros (S510)	S510.039	Ecosystems and Indigenous Biodiversity	ECO - R1	Oppose in part	We request that provision is made for low-level clearance for building sites within SNAs (including for future/not yet approved subdivisions). Providing for these types of living options can actually facilitate predator and pest management and control and is an important lifestyle option for the region.	Amend wording to provide for building sites.
Bradshaw Farms (S511)	S511.039	Ecosystems and Indigenous Biodiversity	ECO - R1	Oppose in part	We request that provision is made for low-level clearance for building sites within SNAs (including for future/not yet approved subdivisions). Providing for these types of living options can actually facilitate predator and pest management and control and is an important lifestyle option for the region.	Amend wording to provide for building sites.

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Paul Avery (S512)	S512.039	Ecosystems and Indigenous Biodiversity	ECO - R1	Oppose in part	We request that provision is made for low-level clearance for building sites within SNAs (including for future/not yet approved subdivisions). Providing for these types of living options can actually facilitate predator and pest management and control and is an important lifestyle option for the region.	Amend wording to provide for building sites.
Brett Avery (S513)	S513.039	Ecosystems and Indigenous Biodiversity	ECO - R1	Oppose in part	We request that provision is made for low-level clearance for building sites within SNAs (including for future/not yet approved subdivisions). Providing for these types of living options can actually facilitate predator and pest management and control and is an important lifestyle option for the region.	Amend wording to provide for building sites.
Aggregate and Quarry Association (S521)	S521.007	Ecosystems and Indigenous Biodiversity	ECO - R1	Amend	Need to provide for lawfully established activities and also the MINZ Zone. This will be consistent with ECO-P2.	Add another permitted item for a <b>lawfully established activity</b> .
Federated Farmers of New Zealand (S524)	S524.065	Ecosystems and Indigenous Biodiversity	ECO - R1	Oppose in part	WCFF support the clearance of indigenous vegetation and disturbance for the maintenance, operation and repair of lawfully established tracks, fences, structures and buildings as this would include farm tracks and fences. The list should also include drains as clearance of drains is necessary to avoid natural hazard risks and water lines which are necessary for animal health. It should also be clear that clause iv. People, property, structures or services includes animals. An additional clause is sought for the clearance of indigenous vegetation where necessary for biosecurity purposes under the Biosecurity Act 1993 such as removal of an unwanted organism. The restrictions in 5 for the Buller and Westland districts are too restrictive and	Amend ECO-R1: 3 ii) maintenance, operation and repair of lawfully established tracks, fences, structures, buildings, water lines, drains, critical infrastructure, network utilities, renewable electricity generation activation or natural hazard mitigation activities iv) To prevent a serious threat to people, animals, property, structures or services xiii) removal of vegetation for biosecurity purposes when directed under the Biosecurity Act 1993. Delete 5 i) and ii) Within Buller and Westland districts and replace with the following: i) indigenous vegetation clearance where it is within an area of improved pasture or crop and is for the purpose of cultivation or pasture maintenance and services to that pasture or crop ii) indigenous vegetation clearance under woodlots and shelterbelts planted for woodlot

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					<p>place an unreasonable burden on farmers to maintain existing pasture for production purposes. The Draft NPS-IB provides for the maintenance of improved pasture where it may affect an SNA and WCFF seek a similar approach until such time as the SNA mapping by Buller and Westland district is included in the district plan.</p> <p>Maintaining existing pasture is important to achieve the strategic direction for agriculture on the West Coast.</p> <p>The Activity status where ECO-R1 (5) is not met is stated to be controlled or Restricted Discretionary depending on the activity type. The only applicable controlled activity rule is ECO-R3 where it is in accordance with an approved plan or permit issued under the Forests Act 1949. Therefore there is essentially no controlled activity rule if the restrictions for Buller and Westland are not met.</p> <p>ECO-R5 applies where the permitted or controlled activity standards are not met.</p>	<p>and shelter purposes</p> <p>Amend ECO-R5 to:</p> <p>Controlled activity</p> <p>Indigenous vegetation clearance not meeting permitted or controlled activity standards</p> <p>Amend matters of discretion to Matters of control</p>
Neil Mouat (S535)	S535.014	Ecosystems and Indigenous Biodiversity	ECO - R1	Oppose in part	<p>We request that provision is made for low-level clearance for building sites within SNAs (including for future/not yet approved subdivisions). Providing for these types of living options can actually facilitate predator and pest management and control and is an important lifestyle option for the region.</p>	Amend wording to provide for building sites.
Buller District Council (S538)	S538.207	Ecosystems and Indigenous Biodiversity	ECO - R1	Oppose in part	<p>Rule 1 permits vegetation clearance in specified circumstances outside of Scheduled SNA and the Coastal Environment. Council is concerned that once SNAs have been identified, mapped and inserted into Schedule 4 any vegetation removal within the scheduled</p>	<p>Amend the heading and body of Rule 1 to:</p> <p>Indigenous vegetation clearance and disturbance <del>outside of the coastal environment</del> <b>within and outside a Significant Natural Area</b></p> <p>1. It is <del>outside of a scheduled Significant</del></p>

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					<p>areas, regardless of scale, will trigger the need for consent and this is of particular concern given the potentially extensive SNAs across the District.</p> <p>Council requests that adequate provision is made for minor indigenous vegetation removal associated with, among other activities, critical infrastructure, natural hazard mitigation and lawfully established activities within SNAs. This is vital to support the social and economic wellbeing of the District. Such an approach would align with Policy 2 which recognises that some minor losses of biodiversity within SNAs is appropriate. The current rule framework does not appear to give effect to Policy 2.</p> <p>Council also considers that provision should be made for small scale building platforms within and outside of SNA's to allow for 'bush living' options. Council considers that vegetation clearance associated with establishment of such will result in only minor losses of biodiversity and is considered appropriate within the context of the extensive area of protected land in the District.</p> <p>Council supports Clause 5 of Rule 1 which permits indigenous vegetation clearance of 0.5ha per site and 5ha of manuka and kanuka in accordance with specified criteria. However, if the suggested amendments to the heading of Rule 1 is accepted, Council recognises that providing for indigenous vegetation clearance in such a manner may not be necessarily appropriate within an SNA</p>	<p>Natural Area as identified in Schedule 4; <b>indigenous vegetation clearance for a residential building and/or access that does not exceed 500m<sup>2</sup> in area per site.</b></p> <p>Consequential amendment:</p> <p>Delete Clause 5 and insert a new rule as discussed below.</p> <p>1 The removal of 'outside of the coastal environment' is a consequential amendment of Rule 2 discussed below.</p>

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					and therefore this clause would need to sit as a separate rule.  Council considers that the rule framework for indigenous vegetation clearance activities needs to be reviewed to ensure that activities are appropriately provided for within and outside of SNAs in a manner consistent with the policy framework.	
Westpower Limited (S547)	S547.259	Ecosystems and Indigenous Biodiversity	ECO - R1	Amend	This rule is extremely complex as it mixes two management approaches.	Split Rule R1 to provide a rule for activities in the Grey District (new ECO-R1) and a rule for activities in the Buller and Westland Districts (new Rule ECOR1A).
Westpower Limited (S547)	S547.260	Ecosystems and Indigenous Biodiversity	ECO - R1	Amend	To clarify activities set out in item 3. can occur within areas defined in item 1.	Amend 1. It is outside of a scheduled ... in Schedule Four; <b>or</b>
Westpower Limited (S547)	S547.261	Ecosystems and Indigenous Biodiversity	ECO - R1	Amend	consistency in wording with the provisions of the plan regarding energy activities.	Amend item 3.ii: The ... structures, buildings, natural hazard mitigation activities <b>or energy activities and infrastructure, including</b> critical infrastructure <b>and</b> renewable generation activities. <del>network utilities</del>
Westpower Limited (S547)	S547.262	Ecosystems and Indigenous Biodiversity	ECO - R1	Amend	to provide for upgrading of energy activities and infrastructure, consistent with RPS.	Add new item under 3. <b>The upgrading of activities in item ii. where the activity is the same or similar in scale character or intensity to the existing activity.</b>
Westpower Limited (S547)	S547.263	Ecosystems and Indigenous Biodiversity	ECO - R1	Amend	To provide for construction and all activities..	Amend item ix. For construction, <b>operation, maintenance, repair and upgrade of an above or below ground energy or infrastructure, including critical infrastructure</b> and the national grid, activity where: ...
Westpower Limited (S547)	S547.264	Ecosystems and Indigenous Biodiversity	ECO - R1	Amend	Would allow corridors to meet safe separation standards for lines and provide consistency.	Amend item ix.a. The construction corridor does not exceed <b>10m</b> in width.

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Westpower Limited (S547)	S547.265	Ecosystems and Indigenous Biodiversity	ECO - R1	Amend	The same level of activity in Grey District as Buller and Westland Districts.	Amend item 4. to permit a level of clearance equivalent to that provided for in the Westland and Buller Districts in Schedule 5 areas.
Westpower Limited (S547)	S547.266	Ecosystems and Indigenous Biodiversity	ECO - R1	Amend	Clarify the permitted status outside Schedule Four area.	Amend activity status: Within the Grey District refer to standard 4 where standard 3 is not achieved. <b>Where standard 4 is achieved any activity is permitted.</b>
Westpower Limited (S547)	S547.267	Ecosystems and Indigenous Biodiversity	ECO - R1	Amend	Activities permitted in Westland and Buller through compliance with either item 3 or 5.	Amend activity status: <b>Within the Westland and Buller Districts refer to standard 5 where standard 3 is not achieved. Where standard 5 is achieved any activity is permitted.</b>
Buller Conservation Group (S552)	S552.074	Ecosystems and Indigenous Biodiversity	ECO - R1	Amend	There needs to be some explanation as to what, 'indigenous vegetation' is	include an explanation as to what, 'indigenous vegetation' is
Buller Conservation Group (S552)	S552.075	Ecosystems and Indigenous Biodiversity	ECO - R1	Oppose	There is no statute or mandate for windthrown timber removal.	Delete R1 3.i
Buller Conservation Group (S552)	S552.076	Ecosystems and Indigenous Biodiversity	ECO - R1	Amend	This permitted rule needs to be tightened	Amend: <del>per site</del> to read <b>per site or per (ha size), which ever is the larger</b> Amend: which is under <del>15 years old</del> to read <b>10 years old</b>
Buller Conservation Group (S552)	S552.209	Ecosystems and Indigenous Biodiversity	ECO - R1	Oppose	R1; 3; vi Any reason new fencelines should be allowed	delete R1; 3; vi
Buller Conservation Group (S552)	S552.210	Ecosystems and Indigenous Biodiversity	ECO - R1	Amend	R1 3.vii The resource consent for the 'Old Ghost Road' included this restriction.	Amend 3.vii. <b>To upgrade or create new public walking or cycling tracks up to 2.5m in width undertaken by the Council or its approved contractor, provided mature trees (greater than 30cm diameter) are avoided</b>
Buller Conservation Group (S552)	S552.211	Ecosystems and Indigenous Biodiversity	ECO - R1	Oppose	3 metre clearance could extend for many kilometres.	Delete R1; 3; ix



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Frida Inta (S553)	S553.074	Ecosystems and Indigenous Biodiversity	ECO - R1	Amend	Clarify what 'indigenous vegetation' is.	There needs to be some explanation as to what, 'indigenous vegetation' is
Frida Inta (S553)	S553.075	Ecosystems and Indigenous Biodiversity	ECO - R1	Amend	There is no statute or mandate for windthrown timber removal in indigenous forests.	Delete R1 3.i.; 3.vi.; 3.ix.
Frida Inta (S553)	S553.076	Ecosystems and Indigenous Biodiversity	ECO - R1	Amend	Much more than one patch of 50000m2 in a contiguous area could be cleared.	Amend: <del>per site</del> to read <b>per site or per (ha size), which ever is the larger</b>
Frida Inta (S553)	S553.213	Ecosystems and Indigenous Biodiversity	ECO - R1	Amend	There is no statute or mandate for windthrown timber removal in indigenous forests.	Amend 3.vii. To upgrade or create new public walking or cycling tracks up to 2.5m in width undertaken by the Council or its approved contractor, provided mature trees (greater than 30cm diameter) are avoided
Frida Inta (S553)	S553.214	Ecosystems and Indigenous Biodiversity	ECO - R1	Amend	15 years can see a really healthy regenerated forest of kanuka or manuka.	Amend: which is under <del>15 years old</del> to read <b>10 years old</b>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.216	Ecosystems and Indigenous Biodiversity	ECO - R1	Oppose	Delete ECO - R1 or amend so that all indigenous vegetation clearance across all districts and is only for purposes, and within limits, that are appropriate as permitted activities to protect Significant Natural Areas, including where such areas have not yet been identified in the Plan, as follows	Delete ECO - R1
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.484	Ecosystems and Indigenous Biodiversity	ECO - R1	Amend	Alternative relief	Amend: Indigenous vegetation clearance and disturbance outside of the coastal environment Activity Status Permitted Where: <del>1- It is outside of a scheduled Significant Natural Area as identified in Schedule Four;</del> <b>12. Within the Riparian Margin of a River, Lake or Wetland the</b> <del>It is</del> clearance is permitted by the Natural Character and the Margins of Waterbodies Rule NC - R1; <del>of and</del> <b>23. The clearance is only</b> <del>it is necessary for one of the following purposes:</del> <del>i- It is the removal of windthrown timber through:</del> a. Use of helicopter recovery methods; or b. Where ground based recovery is only undertaken from

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						<p>areas adjacent to existing vehicle tracks; or ii. i. The maintenance, operation and repair of lawfully established: a. tracks, <b>and clearance is limited to within 1m of the track</b> b. fences, <b>and clearance is limited to within 1m of the fence</b> c. structures, <b>and clearance is limited to within 3m of the structure</b> d. buildings, <b>and clearance is limited to within 5m of the building</b> e. critical infrastructure, <b>and clearance is limited to within 3m of the infrastructure</b> f. network utilities, <b>and clearance is limited to within 3m of the network utility or for above ground utilities is a maximum of area of 50m<sup>2</sup></b> g. renewable electricity generation activities or natural hazard mitigation activities, <b>and clearance is limited to a maximum area of 50m<sup>2</sup></b>; iii. For the installation of temporary network activities following a regional or local state of emergency declaration; iv. To prevent a serious threat to people, property, structures or services <b>necessary to remove vegetation that endangers human life or within 5m of existing buildings or structures</b>; v. To ensure the safe and efficient operation (including maintenance and repair) of any formed public road, rail corridor or access; viii. For the construction of new fences and traplines associated with Conservation Activities or to exclude stock or pest animals <b>from an area of indigenous vegetation, and the clearance is limited to 2m wide to provide for the new fence</b>; vii. To upgrade or create new public walking or cycling tracks up to 3m in width undertaken by the Council or its approved contractor; iviii. To comply with section 43 of the Fire and Emergency Act 2017; ix. <b>For construction or operation of an above ground or below ground network utility or the national grid where: a. The</b></p>

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						<p>construction corridor does not exceed 3m in width; andb. All machinery used in construction is cleaned and made free of weed material and seeds prior to entering the site; andc. Rehabilitation of disturbed areas is undertaken following the completion of construction;vx. It is cultural harvest undertaken by Poutini Ngāi Tahu; orxvi. [Either delete this condition, or include an area limit to the permitted vegetation clearance:] It is on MPZ - Māori Purpose Zoned land and undertaken in accordance with an Iwi/Papatipu Rūnanga Management Plan; orxii. It is within an area subject to a QEII National Trust Covenant or Ngā Whenua Rahui Kawaneta, a Reserves or Conservation Act covenant or a Heritage covenant under the Heritage New Zealand/Pouhere Taonga Act and the vegetation disturbance is authorised by that legal instrument;4. Within the Grey District it is clearance outside of an Outstanding Natural Landscape identified in Schedule Five; or5. Within the Buller and Westland Districts:i. It is the removal or clearance of mānuka, kānuka and bracken only that is not part of any wetland and which is under 15 years old, not exceeding 5ha per site over any continuous three year period, subject to provision of notice to the relevant District Council at least 20 working days prior to the proposed clearance including:a. Details of the location of the proposed clearance;b. Area of the proposed clearance; andc. Verification by documentary, photographic or other means that the vegetation is less than 15 years old and not part of any wetland; orii. It is a maximum area of 5000m per site, in total, over any continuous three year period.<b>Advice Notes:</b>1. Where clearance of mānuka, kānuka or bracken is proposed under</p>

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						Standard 5 (i) of this rule, if proof that the vegetation is less than 15 years old or that the site is not a wetland, is unavailable, then a resource consent will be required.2. Where indigenous vegetation clearance is proposed within the riparian margins of a waterbody refer to these sections of the Plan for the Rules around this clearance.13. Where indigenous vegetation clearance is proposed in or on a site or area of significance to Māori then Rule SASM - R4 will also apply.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.485	Ecosystems and Indigenous Biodiversity	ECO - R1	Amend	The proposed ECO-R1 activity status where compliance is not achieved is complex and confusing.	Amend ECO - R1 Activity status where compliance is not achieved as follows: <del>Discretionary where standard 1 or 4 is not achieved.Refer Natural Character and Margins of Waterbodies Chapter where standard 1 is not achieved</del> Where Condition 1 is not achieved Rule NC – R3 Discretionary applies. <del>Within the Grey District refer standard 4 where standard 3 is not achieved.Within the Buller and Westland Districts Controlled or Restricted Discretionary (depending on activity type) where standard 5 is not achieved.</del> <b>Where Condition 2 is not achieved Rules ECO -R5 Restricted Discretionary or ECO - R7 or ECO - R7A Discretionary apply"</b>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.487	Ecosystems and Indigenous Biodiversity	ECO - R1	Amend	Alternative relief to deleting ECO - R1 condition 4 above	Amend the condition to apply to ONLs in all districts.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.488	Ecosystems and Indigenous Biodiversity	ECO - R1	Amend	In terms of condition 3.xi, we are more concerned, because the lack of a comprehensive SNA assessment means that there may be significant biodiversity values within the MPZ.	Consequential amendment to include a consent requirement for vegetation clearance in MPZ that does not meet condition 3.xi.

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Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.489	Ecosystems and Indigenous Biodiversity	ECO - R1	Amend	Consequential amendment from ECO - R2	Amend ECO - R1 the following conditions/standards to apply in the CE and to be additional to meeting other ECO - R1 conditions; <b>and3. Within the Coastal Environment:i. the indigenous vegetation clearance does not disturb, damage, or destroy habitat or nesting areas of protected species.ii. The indigenous vegetation clearance does not occur in any areas identified as a SNA in Schedule Four.iii. The indigenous vegetation clearance does not occur in an area of land environment of category one or two of the Threatened Environment Classification.</b>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.490	Ecosystems and Indigenous Biodiversity	ECO - R1	Amend	Consequential amendment	Add to ECO-R1 advice notes setting out where information on protected species can be found and where the Threatened Environment Classification can be found, as follows: <b>2. Information on protected species can be found [add location reference]3. The Threatened Environment Classification can be found [add location reference].</b>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.491	Ecosystems and Indigenous Biodiversity	ECO - R1	Amend	Consequential amendment	Add to ECO - R1 the following Activity status where compliance is not achieved: <b>Where Condition 3 is not achieved Rules ECO - R7 and ECO-R7A Discretionary apply"</b>
Catherine Smart-Simpson (S564)	S564.034	Ecosystems and Indigenous Biodiversity	ECO - R1	Amend	this is too restrictive.	Amend to be more enabling of development.
Koiterangi Lime Co LTD (S577)	S577.041	Ecosystems and Indigenous Biodiversity	ECO - R1	Amend	Rules are too restrictive.	Amend to be more enabling of development.
WMS Group (HQ) Limited and WMS Land Co. Limited (S599)	S599.058	Ecosystems and Indigenous Biodiversity	ECO - R1	Support	Recognises the unique context of public conservation land and that Manuka and Kanuka are abundant species that can	Retain as notified.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					quickly regenerate where land clearance has occurred	
Birchfield Coal Mines Ltd (S601)	S601.040	Ecosystems and Indigenous Biodiversity	ECO - R1	Support	provides for a number of vegetation clearance activities	Retain as notified.
Department of Conservation (S602)	S602.075	Ecosystems and Indigenous Biodiversity	ECO - R1	Oppose	Amend Rule ECO-R1 and amend it to apply the maximum permitted vegetation clearance area to all areas in the Plan, and to amend rules 3 and 4 so they apply to public track upgrades only, and to exclude new network utilities or the national grid as vegetation and habitat removal for these activities can adversely affect biodiversity values, and these effects should be assessed through a resource consent application where the maximum area threshold in Rule 2 is exceeded. Amend the advice note to make the rules explicit that the riparian margin clearance rules apply in addition, not substitution, and to clarify that this rule does not apply to any area which meets the SNA criteria.	Amend: Indigenous vegetation clearance and disturbance outside of the coastal environment Activity Status Permitted Where: <ul style="list-style-type: none"> <li>1. It is outside of a <del>scheduled</del> Significant Natural Area as identified in Schedule Four <b>or outside an areas identified in accordance with the Significant Natural Area criteria; and</b></li> <li>2. <del>It is clearance permitted by the Natural Character and the Margins of Waterbodies Rule NC - R1; or</del> <b>The extent of indigenous vegetation disturbed and/or cleared per site does not exceed an area of 5000m2 in any three year period; or</b></li> <li>3. It is necessary for one of the following purposes: <ul style="list-style-type: none"> <li>i. It is the removal of windthrown timber through: <ul style="list-style-type: none"> <li>a. Use of helicopter recovery methods; orb.</li> </ul> </li> <li>Where ground based recovery is only undertaken from areas adjacent to existing vehicle tracks; or</li> <li>ii. ...vi. To upgrade <del>or create new</del> an existing public walking or cycling tracks up to 3m in width undertaken by the Council or its approved contractor;</li> <li>viii. To comply with section 43 of the Fire and Emergency Act 2017;</li> <li>ix. For construction or operation of an above ground or below ground network utility or the national grid where: <del>a. The construction corridor does not</del></li> </ul> </li> </ul>

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<p>exceed 3m in width; and b. All machinery used in construction is cleaned and made free of weed material and seeds prior to entering the site; and c. Rehabilitation of disturbed areas is undertaken following the completion of construction; x. It is cultural harvest undertaken by Poutini Ngāi Tahu; or</p> <p>xi. It is on MPZ - Māori Purpose Zoned land and undertaken in accordance with an Iwi/Papatipu Rūnanga Management Plan; or</p> <p>xii. It is within an area subject to a QEII National Trust Covenant or Ngā Whenua Rahui Kawaneta, a Reserves or Conservation Act covenant or a Heritage covenant under the Heritage New Zealand/Pouhere Taonga Act and the vegetation disturbance is authorised by that legal instrument; and</p> <p>4. Within the Grey District it is clearance outside of an Outstanding Natural Landscape identified in Schedule Five; or</p> <p>5. Within the Buller and Westland Districts:</p> <p>i. ...ii. It is a maximum area of 5000m<sup>2</sup> per site, in total, over any continuous three-year period.</p> <p>Advice Notes:</p> <ol style="list-style-type: none"> <li>1. <b>For the avoidance of doubt, any area of vegetation that meets the criteria set out in Appendix 1 of the West Coast Regional Policy Statement (until such time as nationally consistent criteria apply through a National Policy Statement or National Environmental Standards) is a Significant Natural Area.</b></li> <li>2. ...</li> <li>3. Where indigenous vegetation clearance is proposed within the riparian margins of a waterbody refer</li> </ol>

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						to these sections of the Plan for <b>additional</b> <del>the</del> Rules around this clearance. ...
BRM Developments Limited (S603)	S603.029	Ecosystems and Indigenous Biodiversity	ECO - R1	Support	Recognises that Manuka and Kanuka are abundant species that can quickly regenerate.	Retain as notified.
Birchfield Ross Mining Limited (S604)	S604.034	Ecosystems and Indigenous Biodiversity	ECO - R1	Support	Recognises the unique context associated with the large area of land which is public conservation land.	Retain as notified.
Phoenix Minerals Limited (S606)	S606.030	Ecosystems and Indigenous Biodiversity	ECO - R1	Support	Rule provides for a number of vegetation clearance activities	Retain as notified.
Whyte Gold Limited (S607)	S607.029	Ecosystems and Indigenous Biodiversity	ECO - R1	Support	Provides for a number of vegetation clearance activities within the West Coast Region	Retain as notified.
Grey District Council (S608)	S608.056	Ecosystems and Indigenous Biodiversity	ECO - R1	Amend	For clarification of the rule as intended to be applied	Condition 1: add <b>and</b> to the end of Condition 1. Rule will now read: It is outside of a scheduled Significant Natural Area as identified in Schedule Four; <b>and</b>
Grey District Council (S608)	S608.493	Ecosystems and Indigenous Biodiversity	ECO - R1	Amend	For clarification of the rule as intended to be applied	Condition 3: add "In the....." Rule will now read: <b>"In the Margins of Waterbodies</b> it is necessary for one of the following purposes...
Grey District Council (S608)	S608.629	Ecosystems and Indigenous Biodiversity	ECO - R1	Support	Support this rule as proposed as it provides for the maintenance, operation and repair of lawfully established tracks, structures, buildings, critical infrastructure, network utilities and natural hazard mitigation activities.	Retain as proposed
Karamea Lime Company (S614)	S614.050	Ecosystems and Indigenous Biodiversity	ECO - R1	Amend	Believe this is too restrictive.	Amend to be more enabling of development.
Peter Langford (S615)	S615.050	Ecosystems and Indigenous Biodiversity	ECO - R1	Amend	Believe this is too restrictive.	Amend to be more enabling of development.



Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Scoped Planning and Design Limited (S617)	S617.008	Ecosystems and Indigenous Biodiversity	ECO - R1	Amend	Oppose permitted vegetation clearance standards	Transfer rule ECO-R1(5)(i)(a-b) to a controlled activity status. <b>Add matters of control to include but not limited to:-Adverse effects upon ecological integrity are avoided, remedied or mitigated.-Sedimentary controls and management are planned and implemented.- Adverse effects upon amenity are avoided, remedied or mitigated.-Landscape character is maintained.</b>
Scoped Planning and Design Limited (S617)	S617.009	Ecosystems and Indigenous Biodiversity	ECO - R1	Oppose	Will ensure Council can address vegetation clearance on a case-by-case basis	Delete ECO-R1(5)(ii)
Snodgrass Road submitters (S619)	S619.030	Ecosystems and Indigenous Biodiversity	ECO - R1	Support	Unclear whether a vegetation clearance activity needs to be a named activity under (3)	Amend Rule ECO-R1 to the extent necessary to permit miscellaneous indigenous vegetation clearance of up to 5,000 m <sup>2</sup> per site on the Snodgrass Road submitters properties over any continuous 3-year period
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.145	Ecosystems and Indigenous Biodiversity	ECO - R1	Amend	This activity needs to be inclusion of MPZ - Māori Purpose Zoned land and the Sites or Areas of Significance to Māori listed in Schedule Three.	Amend 3(xi) as follows: 3(x) It is a <del>cultural harvest undertaken by</del> Poutini Ngāi Tahu <b>activity</b> ; ...
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.398	Ecosystems and Indigenous Biodiversity	ECO - R1	Amend	relief sought with Poutini Ngai Tahu Activity definition.	...3(xi) It is on MPZ - Māori Purpose Zoned land <b>or a Site or Area of Significance to Māori listed in Schedule Three</b> and is undertaken in accordance with an Iwi/Papatipu Rūnanga Management Plan; or ...
Geoff Volckman (S663)	S563.0171	Ecosystems and Indigenous Biodiversity	ECO - R1	Oppose in part	We believe is too restrictive.	Amend to be more enabling of development
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.327	Ecosystems and Indigenous Biodiversity	ECO - R2	Support	We support this rule.	Retain rule.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Transpower New Zealand Limited (S299)	S299.076	Ecosystems and Indigenous Biodiversity	ECO - R2	Amend	<p>Specific recognition of the National Grid (or at the very least Critical infrastructure) should be provided in 1(ii), for consistency with ECO-R1. Specific to the National Grid, the NESETA manages the trimming, felling and removal of vegetation and earthworks, with the activity status under the NESETA determined by the provisions in the Proposed TTPP. The NESETA provides for earthworks and trimming, felling or removal of any vegetation as permitted activities subject to conditions. Therefore, the NESETA would prevail over this rule for operation, maintenance, upgrading or removal of a transmission line. ECO-R2 would remain applicable for installation.</p>	Amend the rule as follows: ECO-R2 - Indigenous Vegetation Clearance in the Coastal Environment Where: This is for: Walking/cycling tracks, roads, farm tracks or fences; Operation, maintenance, repair, upgrading and installation of new network utility infrastructure and renewable electricity generation activities <b>including the National Grid</b> ; or Establishment of a building platform and access to a building site in an approved subdivision or where there is no existing residential building on the site
Lynne Lever & Greg Tinney (S320)	S320.004	Ecosystems and Indigenous Biodiversity	ECO - R2	Amend	<p>Indigenous vegetation clearance and disturbance within the coastal environment ECO Rule 2 requires amendment for permitted activities and clearance areas within a coastal overlay. Restricting free hold rural landowners to permitted clearance/ disturbance of 500m2 per 3 years for the very short list of permitted activity is not realistic. It will be particularly harsh on young families, low and middle income earners and owners of small holdings. There is no clear provision in the indigenous clearance and disturbance permitted activities lists for many basic West Coast landowner/homesteading needs and activities [refer submission for more details] The expense and demands of a resource</p>	Amend for permitted activities and clearance areas within a coastal overlay to allow for more landowner/homesteading needs and activities.

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					consent process for small scale needs and activity will be out of reach for many.	
Tony Schroder (S343)	S343.005	Ecosystems and Indigenous Biodiversity	ECO - R2	Oppose	Needs clarification and amendment re Permitted Activities and Clearance areas	Clarify the rule and make it less restrictive for freehold rural landowners. Provide for basic West Coast landowner/homesteading activities.
Emi Schroder (S369)	S369.004	Ecosystems and Indigenous Biodiversity	ECO - R2	Oppose	ECO Rules 1 and 2 need amendment and clarification regarding permitted activities and clearance areas. ECO rule 2 is particularly harsh and restrictive for free hold rural landowners in the coastal environment. There is no clear provision in the permitted activities list for many basic west coast landowner/homesteading activities.	Amend Rule ECO R2 to be less restrictive for rural landowners in the coastal environment. Ensure the rule provides permitted activities for basic west coast landowner/ homesteading activities.
Manawa Energy Limited (Manawa Energy) (S438)	S438.082	Ecosystems and Indigenous Biodiversity	ECO - R2	Support	Manawa supports the explicit recognition of and provision for renewable electricity activities within the coastal environment.	Retain ECO - R2 (1)(ii) as notified.
KiwiRail Holdings Limited (S442)	S442.052	Ecosystems and Indigenous Biodiversity	ECO - R2	Amend	KiwiRail seeks amendment to ensure that this provision applies to operation, maintenance, repair, upgrading and installation of critical infrastructure as well as network utility infrastructure.	Amend as follows: Activity Status Permitted Where: This is for: Walking/cycling tracks, roads, farm tracks or fences; Operation, maintenance, repair, upgrading and installation of <b>critical infrastructure</b> , new network utility infrastructure and renewable electricity generation activities; or [...]
Suzanne Hills (S443)	S443.029	Ecosystems and Indigenous Biodiversity	ECO - R2	Oppose	Who decides if the permitted clearance disturbs, damages or destroys nesting areas or habitats of protected species. Because this is a permitted activity it is open to abuse and puts remaining coastal indigenous vegetation at risk. Again it is unclear if the 500m2 is a blanket clearance rule for any purpose, or a capping rule for the stated purposes. Point 4 puts indigenous vegetation in the Buller and Westland coastal environment at risk since SNAs are not yet identified for these districts.	Amend the rule to be clearer and address concerns in the submission around nesting areas and habitats of protected species and indigenous vegetation in the Buller and Westland district.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Clare Backes (S444)	S444.011	Ecosystems and Indigenous Biodiversity	ECO - R2	Oppose	ECO-R2. 2. could lead to the loss of significant vegetation over a number of years and should not be a permitted activity. ECO- R2. 3. - The indigenous vegetation clearance does not disturb, damage or destroy nesting areas or habitat of protected species. It is unclear as to how this vegetation will be identified, and by whom. As it is a permitted activity it puts indigenous vegetation in the Coastal Environment at risk. ECO-R2. 4. This does not protect Significant Natural Areas in Westland and Buller.	The whole of ECO-R2 needs to be rewritten to properly protect indigenous vegetation in Grey, Westland and Buller Districts.
Waka Kotahi NZ Transport Agency (S450)	S450.088	Ecosystems and Indigenous Biodiversity	ECO - R2	Support	Waka Kotahi supports this rule which provides for Indigenous vegetation clearance in the coastal environment as a permitted activity where the clearance is for walking/cycling tracks, roads and operation, maintenance, repair, upgrading and installation of new network utility infrastructure.	Retain as proposed
Russell and Joanne Smith (S477)	S477.004	Ecosystems and Indigenous Biodiversity	ECO - R2	Oppose	The 500m2 clearance in the coastal environment is unduly restrictive and unnecessary for the protection of the coastal character or indigenous biodiversity. It does not enable clearance for a typical rural dwelling and access and is inconsistent with the underlying zoning of the property as rural residential.	Delete ECO - R2 Alternatively, increase vegetation clearance area in the coastal environment to more accurately reflect the vegetation clearance required in a typical build.
Tim Macfarlane (S482)	S482.004	Ecosystems and Indigenous Biodiversity	ECO - R2	Oppose	The 500m2 clearance in the coastal environment is unduly restrictive and unnecessary for the protection of the coastal character or indigenous biodiversity. It does not enable clearance for a typical rural dwelling and access and is inconsistent with the underlying zoning of the property as rural residential.	Delete ECO - R2 Alternatively, increase vegetation clearance area in the coastal environment to more accurately reflect the vegetation clearance required in a typical build.

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West Coast Regional Council (S488)	S488.004	Ecosystems and Indigenous Biodiversity	ECO - R2	Amend	Rule NC - R1 permits indigenous vegetation clearance and earthworks specifically for environmental monitoring facilities within the margins of waterways. However, the permitted Rules ECO - R1 and R2 for indigenous vegetation clearance outside of, and within, the coastal environment respectively do not refer to environmental monitoring facilities. There seems to be a disconnect between these Rules. R1 Condition 3ii refers to "critical infrastructure", and it would provide consistency if either environmental monitoring facilities are added to ECO - R1 and R2, or environmental monitoring facilities are added to the definition of "critical infrastructure". Flood warning data transmitted via hydrology monitoring structures is critical for Civil Defence planning and response.	"environmental monitoring facilities" are added to permitted Rules ECO - R2;
West Coast Regional Council (S488)	S488.006	Ecosystems and Indigenous Biodiversity	ECO - R2	Amend		Amend permitted Rule ECO - R2, Condition 1 to include "existing natural hazard mitigation structures" or "critical infrastructure";
West Coast Regional Council (S488)	S488.026	Ecosystems and Indigenous Biodiversity	ECO - R2	Amend	Indigenous Vegetation Clearance in the Coastal Environment": Condition 1 does not provide for the existing Rating District protection structures in the coastal environment as they are not included in the definition of network utility infrastructure. The WCRC's Rating District protection structures have an important role in protecting adjoining land, buildings and infrastructure from flood risk. There are currently 10 Rating District hazard protection structures in the coastal environment.	Condition 1 should be amended to include "natural hazard mitigation structures" or "critical infrastructure", or add "natural hazard mitigation structures" to the definition of critical infrastructure.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
TiGa Minerals and Metals Limited (S493)	S493.055	Ecosystems and Indigenous Biodiversity	ECO - R2	Oppose	Unduly restrictive and unnecessary for the protection of coastal character.	Delete ECO - R2. Alternatively, set a higher vegetation clearance activity, such as 2,000m2 and allow any activity (not just residential, network utility, tracks etc) to carry out limited clearance works.
Claire & John West (S506)	S506.004	Ecosystems and Indigenous Biodiversity	ECO - R2	Oppose	The 500m2 clearance in the coastal environment is unduly restrictive and unnecessary for the protection of the coastal character or indigenous biodiversity. It does not enable clearance for a typical rural dwelling and access and is inconsistent with the underlying zoning of the property as rural residential.	Alternatively, increase vegetation clearance area in the coastal environment to more accurately reflect the vegetation clearance required in a typical build. H4
Leonie Avery (S507)	S507.040	Ecosystems and Indigenous Biodiversity	ECO - R2	Oppose in part	We request that provision is made for low-level clearance for building sites within SNAs (including for future/not yet approved subdivisions). Providing for these types of living options can actually facilitate predator and pest management and control and is an important lifestyle option for the region.	Amend wording to provide for building sites.
Jared Avery (S508)	S508.040	Ecosystems and Indigenous Biodiversity	ECO - R2	Oppose in part	We request that provision is made for low-level clearance for building sites within SNAs (including for future/not yet approved subdivisions). Providing for these types of living options can actually facilitate predator and pest management and control and is an important lifestyle option for the region.	Amend wording to provide for building sites.
Kyle Avery (S509)	S509.040	Ecosystems and Indigenous Biodiversity	ECO - R2	Oppose in part	We request that provision is made for low-level clearance for building sites within SNAs (including for future/not yet approved subdivisions). Providing for these types of living options can actually facilitate predator and pest management and control and is an important lifestyle option for the region.	Amend wording to provide for building sites.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Avery Bros (S510)	S510.040	Ecosystems and Indigenous Biodiversity	ECO - R2	Oppose in part	We request that provision is made for low-level clearance for building sites within SNAs (including for future/not yet approved subdivisions). Providing for these types of living options can actually facilitate predator and pest management and control and is an important lifestyle option for the region.	Amend wording to provide for building sites.
Bradshaw Farms (S511)	S511.040	Ecosystems and Indigenous Biodiversity	ECO - R2	Oppose in part	We request that provision is made for low-level clearance for building sites within SNAs (including for future/not yet approved subdivisions). Providing for these types of living options can actually facilitate predator and pest management and control and is an important lifestyle option for the region.	Amend wording to provide for building sites.
Paul Avery (S512)	S512.040	Ecosystems and Indigenous Biodiversity	ECO - R2	Oppose in part	We request that provision is made for low-level clearance for building sites within SNAs (including for future/not yet approved subdivisions). Providing for these types of living options can actually facilitate predator and pest management and control and is an important lifestyle option for the region.	Amend wording to provide for building sites.
Brett Avery (S513)	S513.040	Ecosystems and Indigenous Biodiversity	ECO - R2	Oppose in part	We request that provision is made for low-level clearance for building sites within SNAs (including for future/not yet approved subdivisions). Providing for these types of living options can actually facilitate predator and pest management and control and is an important lifestyle option for the region.	Amend wording to provide for building sites.
Aggregate and Quarry Association (S521)	S521.008	Ecosystems and Indigenous Biodiversity	ECO - R2	Amend	Need to provide for lawfully established activities and also the MINZ Zone.	Add another permitted item for a lawfully established activity.
Federated Farmers of New Zealand (S524)	S524.066	Ecosystems and Indigenous Biodiversity	ECO - R2	Support in part	Provides for farm tracks and fences provided other conditions are met. There should also be provision for water lines, drains and pasture maintenance.	Amend ECO-R2 1 i) Walking / cycling tracks, roads, farm tracks, fences, water lines, <b>drains and pasture</b>

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<b>maintenance.</b>
Denis and Wendy Cadigan (S532)	S532.002	Ecosystems and Indigenous Biodiversity	ECO - R2	Oppose	A 500m2 limit is considered too restrictive to enable most building platforms and associated access for rural lifestyle properties to be constructed.	Remove or increase the limit on vegetation clearance to at least 1,000m2 per site, which is consistent with the minimum site size in Settlements where septic disposal is required to be provided on site (indicating a suitable building platform), and exclude access from the limit on vegetation clearance.
Lauren Nyhan Anthony Phillips (S533)	S533.004	Ecosystems and Indigenous Biodiversity	ECO - R2	Oppose	The 500m2 clearance in the coastal environment is unduly restrictive and unnecessary for the protection of the coastal character or indigenous biodiversity. It does not enable clearance for a typical rural dwelling and access and is inconsistent with the underlying zoning of the property as rural residential.	Alternatively, increase vegetation clearance area in the coastal environment to more accurately reflect the vegetation clearance required in a typical build. H4
Neil Mouat (S535)	S535.015	Ecosystems and Indigenous Biodiversity	ECO - R2	Oppose in part	We request that provision is made for low-level clearance for building sites within SNAs (including for future/not yet approved subdivisions). Providing for these types of living options can actually facilitate predator and pest management and control and is an important lifestyle option for the region.	Amend wording to provide for building sites.
Buller District Council (S538)	S538.209	Ecosystems and Indigenous Biodiversity	ECO - R2	Oppose in part	Council has similar concerns with Rule 2 as for Rule 1. While the rule provides for vegetation clearance within the Coastal Environment, this is outside of scheduled SNAs. Council is concerned that once SNAs have been identified, mapped and inserted into Schedule 4, any vegetation removal within the scheduled areas, regardless of scale, will trigger the need for consent and this is of particular concern given the inland extent of the Coastal Environment boundary.	Amend the heading to Rule 1 to remove the reference to the Coastal Environment.



Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					<p>A substantial portion of the District's roading infrastructure is located within the Coastal Environment, along with other critical infrastructure. The extreme weather events experienced in recent times has caused significant disruption to infrastructure, triggering the need for hazard mitigation measures and this is expected to increase over the life of the plan. It is vital for the District's social and economic well-being that critical infrastructure within Coastal Environment SNAs is able to be maintained.</p> <p>Council requests that provision is made for minor vegetation removal associated with, among other activities, critical infrastructure, natural hazard mitigation and lawfully established activities within Coastal Environment SNAs.</p>	
Buller Conservation Group (S552)	S552.077	Ecosystems and Indigenous Biodiversity	ECO - R2	Oppose	Walking/cycling tracks within the coastal environment should not be a permitted activity.	amend <del>per site</del> to be <b>per site or per (ha size), which ever is the larger</b>
Frida Inta (S553)	S553.077	Ecosystems and Indigenous Biodiversity	ECO - R2	Oppose	Creating walking/cycling tracks should not be a permitted activity.	amend <del>per site</del> to be <b>per site or per (ha size), which ever is the larger</b>
Stewart & Catherine Nimmo (S559)	S559.004	Ecosystems and Indigenous Biodiversity	ECO - R2	Oppose	The 500m2 clearance in the coastal environment is unduly restrictive and unnecessary for the protection of the coastal character or indigenous biodiversity. It does not enable clearance for a typical rural dwelling and access and is inconsistent with the underlying zoning of the property as rural residential.	Alternatively, increase vegetation clearance area in the coastal environment to more accurately reflect the vegetation clearance required in a typical build. H4
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.217	Ecosystems and Indigenous Biodiversity	ECO - R2	Oppose	It is uncertain whether ECO-R2 will give effect to Policy 11 of the NZCPS, WCRPS or proposed ECO policies, to avoid adverse effects and significant	Delete ECO - R2

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					adverse effects on indigenous biodiversity.	
Catherine Smart-Simpson (S564)	S564.035	Ecosystems and Indigenous Biodiversity	ECO - R2	Amend	this is too restrictive.	Amend to be more enabling of development.
Joel and Jennifer Watkins (S565)	S565.005	Ecosystems and Indigenous Biodiversity	ECO - R2	Amend	500m2 is insufficient for building platform and access on land	Remove 500m2 limit on clearance for building platforms, site and access in an approved subdivision
Greg Maitland (S571)	S571.007	Ecosystems and Indigenous Biodiversity	ECO - R2	Amend	that the people of the West Coast are the ones paying for the actions of past and present inhabitants in other provinces	Amend to extend permitted activities and clearance areas disturbance of 500m2 per 3 years in the coastal environment
Koiterangi Lime Co LTD (S577)	S577.042	Ecosystems and Indigenous Biodiversity	ECO - R2	Amend	Rules are too restrictive	Amend to be more enabling of development.
Tim and Phaedra Robins (S579)	S579.005	Ecosystems and Indigenous Biodiversity	ECO - R2	Oppose	The 500m2 clearance rule is considered to be unduly restrictive and unnecessary	Delete ECO - R2
Tim and Phaedra Robins (S579)	S579.006	Ecosystems and Indigenous Biodiversity	ECO - R2	Amend	The 500m2 clearance rule is considered to be unduly restrictive and unnecessary	Alternative relief, increase vegetation clearance volume to more accurately reflect the vegetation clearance required in a typical build
WMS Group (HQ) Limited and WMS Land Co. Limited (S599)	S599.059	Ecosystems and Indigenous Biodiversity	ECO - R2	Oppose	The 500m2 clearance rule is considered to be unduly restrictive and unnecessary for the protection of coastal character or indigenous biodiversity.	Delete ECO - R2. Alternatively, set a higher vegetation clearance activity, such as 2,000m2 and allow any activity (not just residential, network utility, tracks etc) to carry out limited clearance works.
Birchfield Coal Mines Ltd (S601)	S601.041	Ecosystems and Indigenous Biodiversity	ECO - R2	Oppose	The 500m2 clearance rule is considered to be unduly restrictive and unnecessary.	Delete ECO -R2. Alternatively, set a higher vegetation clearance activity, such as 2,000m2 and allow any activity (not just residential, network utility, tracksetc) to carry out limited clearance works.
Department of Conservation (S602)	S602.076	Ecosystems and Indigenous Biodiversity	ECO - R2	Amend	Amend the rule and advice note to remove ambiguity and to make the rules explicit that the riparian margin clearance rules apply in addition, not substitution,	Amend: Indigenous Vegetation Clearance in the Coastal Environment Activity Status Permitted Where: 1. ... 2. The extent of indigenous vegetation

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					and that SNA areas are not just those areas scheduled in Schedule 4.	<p>disturbed and/or cleared per site does not exceed an area of 500m2 <del>in area per site</del> in any three year period;</p> <p>3. The indigenous vegetation clearance does not disturb, damage or destroy nesting areas or habitat of protected species; and</p> <p>4. The indigenous vegetation clearance does not occur in any area identified as a Significant Natural Area in Schedule Four <b>or in accordance with the Significant Natural Area criteria.</b></p> <p>Advice Notes:</p> <ol style="list-style-type: none"> <li><b>For the avoidance of doubt, any area of vegetation that meets the criteria set out in Appendix 1 of the West Coast Regional Policy Statement (until such time as nationally consistent criteria apply through a National Policy Statement or National Environmental Standards) is a Significant Natural Area, and this rule does not apply.</b></li> <li>Where indigenous vegetation clearance is proposed within the riparian margins of a waterbody refer to these sections of the Plan for <del>the</del> <b>additional</b> Rules around this clearance.</li> </ol> <p>...</p>
BRM Developments Limited (S603)	S603.030	Ecosystems and Indigenous Biodiversity	ECO - R2	Oppose	The 500m2 clearance rule is considered to be unduly restrictive and unnecessary	Delete ECO - R2. Alternatively, set a higher vegetation clearance activity, such as 2,000m2 and allow any activity (not just residential, network utility, tracks etc) to carry out limited clearance works.
Birchfield Ross Mining Limited (S604)	S604.035	Ecosystems and Indigenous Biodiversity	ECO - R2	Oppose	The 500m2 clearance rule is considered to be unduly restrictive and unnecessary	Delete ECO - R2.

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Birchfield Ross Mining Limited (S604)	S604.114	Ecosystems and Indigenous Biodiversity	ECO - R2	Amend	The 500m2 clearance rule is considered to be unduly restrictive and unnecessary	Amend to set a higher vegetation clearance activity, such as 2,000m2 and allow any activity (not just residential, network utility, tracks etc) to carry out limited clearance works.
Phoenix Minerals Limited (S606)	S606.031	Ecosystems and Indigenous Biodiversity	ECO - R2	Oppose	This rule contains a very restrictive vegetation clearance requirement	Delete ECO - R2, or alternatively amend to set a higher vegetation clearance activity, such as 2,000m2 and allow any activity (not just residential, network utility, tracks etc) to carry out limited clearance works.
Grey District Council (S608)	S608.057	Ecosystems and Indigenous Biodiversity	ECO - R2	Amend	Grey DC has identified areas of SNA within the Coastal Environment	New Condition 1: <b>Within the Grey District it is outside of a scheduled Significant Natural Area as identified in Schedule Four;</b>
Grey District Council (S608)	S608.494	Ecosystems and Indigenous Biodiversity	ECO - R2	Support	Grey DC has identified areas of SNA within the Coastal Environment	Add between Condition 1 and Condition 2 <b>Within the Buller and Westland Districts:</b> Relabel Conditions: 1 - 2 2 - 3 3 - 4 Delete Condition 4
Grey District Council (S608)	S608.630	Ecosystems and Indigenous Biodiversity	ECO - R2	Support	Supports this rule which provides for Indigenous vegetation clearance in the coastal environment as a permitted activity where the clearance is for walking/cycling tracks, roads and operation, maintenance, repair, upgrading and installation of new network utility infrastructure.	Retain as proposed
Karamea Lime Company (S614)	S614.051	Ecosystems and Indigenous Biodiversity	ECO - R2	Amend	Believe this is too restrictive.	Amend to be more enabling of development.
Peter Langford (S615)	S615.051	Ecosystems and Indigenous Biodiversity	ECO - R2	Amend	Believe this is too restrictive.	Amend to be more enabling of development.
Snodgrass Road submitters (S619)	S619.031	Ecosystems and Indigenous Biodiversity	ECO - R2	Amend	It is important that the rule permit miscellaneous clearance on the Snodgrass Road submitters' properties	Amend Rule ECO-R1 to the extent necessary to permit miscellaneous indigenous vegetation clearance of up to 5,000 m <sup>2</sup> per site on the Snodgrass Road submitters properties over any continuous 3-year period.

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Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.146	Ecosystems and Indigenous Biodiversity	ECO - R2	Amend	Cultural harvest and cultural activities undertaken by Poutini Ngāi Tahu also occur within the coastal environment	Insert activity standard 1(iv) and (v) and amend Condition 4 as follows: ... <b>oriv. It is a Poutini Ngāi Tahu activity; or (v) it is on MPZ - Māori Purpose Zoned land or a Site or Area of Significance to Māori listed in Schedule Three and is undertaken in accordance with an Iwi/Papatipu Runanga Management Plan;</b> 4. The indigenous vegetation clearance does not occur in any area identified as a Significant Natural Area in Schedule Four <b>unless it is a Poutini Ngai Tahu activity or it is on MPZ - Māori Purpose Zoned land or a Site or Area of Significance to Māori listed in Schedule Three and is being undertaken in accordance with an Iwi/Papatipu Runanga Management Plan.</b>
Westpower Limited (S547)	S547.0503	Ecosystems and Indigenous Biodiversity	ECO - R2	Amend	Whilst the intent of the rule is clear and supported in part it is submitted that, (1) It is unclear how areas mapped in Schedule Four apply in the Coastal Environment of the Grey District. The matter should be clarified in regard to the identification of such sites in the Grey District given that the SNA areas identified in the Grey District have been adopted in the Plan. (2) Where Schedule Four does apply provide for activities within and outside those areas. (3) This rule should be located in the Coastal Environment to ensure integrated consideration of all relevant matters related to the Coastal Environment. (4) It is unclear whether this includes the Urban Area given commentary at the beginning of the plan advising that such areas are not included in the coastal environment when compared to the	(1) Confirm the function of Schedule Four in identifying significant natural areas in the Coastal Environment of the Grey District. (2) Relevant permitted rules for activities inside or outside Schedule Four areas in the Grey District Coastal are provided, including an opportunity to comment on such rules. (3) Relocate the rule to the Coastal Chapter. (4) Add an exception to the Rule Title, "Indigenous Vegetation Clearance ... <b>(Note: Urban Areas are not being part of the Coastal Environment for the purpose of this rule.)</b> or like effect. (5) Amend item 1.ii., "Operation, ..., <b>and installation of new energy activities and infrastructure, including critical infrastructure and renewable electricity generation activities.</b> " (6) Amend the applicable area limit in item 2., "2. The extent of ... in area <b>per work</b> site ...". (7) Add an exception to items 2. & 3. for maintenance, <b>"Except that these limits shall</b>

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					<p>mapped coastal environment. This should be clarified in the rule.</p> <p>(5) Amend item "1.ii." to provide wording consistent with other provisions regarding energy activities.</p> <p>(6) Amend the area limit to refer to the work site given that there may be any number of activities occurring over a length of the coastal environment.</p> <p>(7) Provide an exception to area limits for maintaining existing disturbed areas and corridors in items "2." and "3."</p>	<b>not apply to ongoing maintenance of existing disturbed or cleared areas for corridor management purposes."</b>
Westpower Limited (S547)	S547.0506	Ecosystems and Indigenous Biodiversity	ECO - R2	Support	<p>Whilst the intent of the rule is clear and supported in part it is submitted that,</p> <p>(1) It is unclear how areas mapped in Schedule Four apply in the Coastal Environment of the Grey District. The matter should be clarified in regard to the identification of such sites in the Grey District given that the SNA areas identified in the Grey District have been adopted in the Plan.</p> <p>(2) Where Schedule Four does apply provide for activities within and outside those areas.</p> <p>(3) This rule should be located in the Coastal Environment to ensure integrated consideration of all relevant matters related to the Coastal Environment.</p> <p>(4) It is unclear whether this includes the Urban Area</p>	<p>(1) Confirm the function of Schedule Four in identifying significant natural areas in the Coastal Environment of the Grey District.</p> <p>(2) Relevant permitted rules for activities inside or outside Schedule Four areas in the Grey District Coastal are provided, including an opportunity to comment on such rules.</p> <p>(3) Relocate the rule to the Coastal Chapter.</p> <p>(4) Add an exception to the Rule Title, "Indigenous Vegetation Clearance ... (<b>Note: Urban Areas are not being part of the Coastal Environment for the purpose of this rule.</b>) or like effect.</p> <p>(5) Amend item 1.ii., "Operation, ..., and <b>installation of new energy activities and infrastructure, including critical infrastructure and renewable electricity generation activities.</b>"</p> <p>(6) Amend the applicable area limit in item 2., "2. The extent of ... in area <b>per work</b> site ...".</p> <p>(7) Add an exception to items 2. &amp; 3. for maintenance, "<b>Except that these limits shall not apply to ongoing maintenance of existing disturbed or cleared areas for corridor management purposes.</b>"</p>

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					<p>given commentary at the beginning of the plan advising that such areas are not included in the coastal environment when compared to the mapped coastal environment. This should be clarified in the rule.</p> <p>(5) Amend item "1.ii." to provide wording consistent with other provisions regarding energy activities.</p> <p>(6) Amend the area limit to refer to the work site given that there may be any number of activities occurring over a length of the coastal environment.</p> <p>(7) Provide an exception to area limits for maintaining existing disturbed areas and corridors in items "2." and "3."</p>	
Geoff Volckman (S563)	S563.0172	Ecosystems and Indigenous Biodiversity	ECO - R2	Oppose in part	Too restrictive	Amend to be more enabling of development
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.328	Ecosystems and Indigenous Biodiversity	ECO - R3	Support	We support this rule.	Retain rule.
Steve Croasdale (S516)	S516.041	Ecosystems and Indigenous Biodiversity	ECO - R3	Amend	I believe this is too restrictive.	Amend to be more enabling of development.
Buller District Council (S538)	S538.210	Ecosystems and Indigenous Biodiversity	ECO - R3	Support	Rule 3 is supported.	Retain as notified.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Chris & Jan Coll (S558)	S558.101	Ecosystems and Indigenous Biodiversity	ECO - R3	Amend	We believe this is too restrictive.	Amend to be more enabling of development.
Chris & Jan Coll (S558)	S558.103	Ecosystems and Indigenous Biodiversity	ECO - R3	Amend	that provision is made for low-level clearance for building sites.	Amend wording to provide for building sites.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.218	Ecosystems and Indigenous Biodiversity	ECO - R3	Oppose	A controlled activity status limits the matters that council can consider and does not provide sufficient discretion for council to decline consent where that may be necessary and appropriate.	Delete ECO-R3
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.495	Ecosystems and Indigenous Biodiversity	ECO - R3	Oppose	Alternative relief	Delete ECO - R3 and rely on the ECO Discretionary and Non -Complying rules to capture this activity.
Geoff Volckman (S563)	S563.030	Ecosystems and Indigenous Biodiversity	ECO - R3	Oppose in part	We believe this is too restrictive.	Amend to be more enabling of development.
Catherine Smart-Simpson (S564)	S564.036	Ecosystems and Indigenous Biodiversity	ECO - R3	Amend	this is too restrictive.	Amend to be more enabling of development.
Chris J Coll Surveying Limited (S566)	S566.101	Ecosystems and Indigenous Biodiversity	ECO - R3	Amend	We believe this is too restrictive.	Amend to be more enabling of development.
Chris J Coll Surveying Limited (S566)	S566.103	Ecosystems and Indigenous Biodiversity	ECO - R3	Amend	that provision is made for low-level clearance for building sites.	Amend wording to provide for building sites.
William McLaughlin (S567)	S567.182	Ecosystems and Indigenous Biodiversity	ECO - R3	Amend	We believe this is too restrictive.	Amend to be more enabling of development.
William McLaughlin (S567)	S567.184	Ecosystems and Indigenous Biodiversity	ECO - R3	Amend	that provision is made for low-level clearance for building sites.	Amend wording to provide for building sites.
Laura Coll McLaughlin (S574)	S574.101	Ecosystems and Indigenous Biodiversity	ECO - R3	Amend	We believe this is too restrictive.	Amend to be more enabling of development.



Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Laura Coll McLaughlin (S574)	S574.103	Ecosystems and Indigenous Biodiversity	ECO - R3	Amend	that provision is made for low-level clearance for building sites.	Amend wording to provide for building sites.
Koiterangi Lime Co LTD (S577)	S577.043	Ecosystems and Indigenous Biodiversity	ECO - R3	Amend	Rules are too restrictive.	Amend to be more enabling of development.
Grey District Council (S608)	S608.055	Ecosystems and Indigenous Biodiversity	ECO - R3	Amend	Activities that have been lawfully established or have an operational need to locate	<b>ECO - R3 Indigenous Vegetation Clearance within a Significant Natural Area Activity Status Permitted</b> <b>Where: 1. This is for: i. The maintenance, operation and repair of lawfully established tracks, fences, structures, buildings, critical infrastructure, network utilities, renewable electricity generation activities or natural hazard mitigation activities; ii. For the installation of temporary network activities following a regional or local state of emergency declaration; iii. To prevent a serious threat to people, property, structures or services; iv. To ensure the safe and efficient operation (including maintenance and repair) of any formed public road, rail corridor or access; v. For the construction of new fences and traplines associated with Conservation Activities or to exclude stock or pest animals; vii. To comply with section 43 of the Fire and Emergency Act 2017;</b>
Grey District Council (S608)	S608.058	Ecosystems and Indigenous Biodiversity	ECO - R3	Amend	Consequential amendment due to change sought to Rule 2	Amend Condition 2 to remove " <del>and outside of the Coastal Environment</del> " Condition to read: "The indigenous vegetation clearance is outside of any Significant Natural Area identified in Schedule Four "
Karamea Lime Company (S614)	S614.052	Ecosystems and Indigenous Biodiversity	ECO - R3	Amend	Believe this is too restrictive.	Amend to be more enabling of development.

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Peter Langford (S615)	S615.052	Ecosystems and Indigenous Biodiversity	ECO - R3	Amend	Believe this is too restrictive.	Amend to be more enabling of development.
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.147	Ecosystems and Indigenous Biodiversity	ECO - R3	Amend	There is a discontent between the policy and the rules.	either amend ECO-P7, or include <b>Poutini Ngai Tahu values, rights and interests</b> and other relevant matters listed in ECO- P7 as matters of control.
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.329	Ecosystems and Indigenous Biodiversity	ECO - R4/SUB - R7	Support	We support this rule.	Retain rule.
Waka Kotahi NZ Transport Agency (S450)	S450.089	Ecosystems and Indigenous Biodiversity	ECO - R4/SUB - R7	Support	Waka Kotahi supports the controlled activity status rule to manage subdivision of land containing areas of significant indigenous vegetation or habitats of significant fauna.	Retain as proposed.
New Zealand Coal & Carbon Limited (S472)	S472.017	Ecosystems and Indigenous Biodiversity	ECO - R4/SUB - R7	Support in part		Retain the Discretionary activity status of ECO-R7.
Leonie Avery (S507)	S507.041	Ecosystems and Indigenous Biodiversity	ECO - R4/SUB - R7	Oppose in part		Not stated
Jared Avery (S508)	S508.041	Ecosystems and Indigenous Biodiversity	ECO - R4/SUB - R7	Oppose in part		Not stated
Kyle Avery (S509)	S509.041	Ecosystems and Indigenous Biodiversity	ECO - R4/SUB - R7	Oppose in part		Not stated
Avery Bros (S510)	S510.041	Ecosystems and Indigenous Biodiversity	ECO - R4/SUB - R7	Oppose in part		
Bradshaw Farms (S511)	S511.041	Ecosystems and Indigenous Biodiversity	ECO - R4/SUB - R7	Oppose in part		
Paul Avery (S512)	S512.041	Ecosystems and Indigenous Biodiversity	ECO - R4/SUB - R7	Oppose in part		

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Brett Avery (S513)	S513.041	Ecosystems and Indigenous Biodiversity	ECO - R4/SUB - R7	Oppose in part		
Federated Farmers of New Zealand (S524)	S524.067	Ecosystems and Indigenous Biodiversity	ECO - R4/SUB - R7	Support	Support the use of conservation covenants as a tool to protect significant indigenous biodiversity.	Retain as notified.
Neil Mouat (S535)	S535.017	Ecosystems and Indigenous Biodiversity	ECO - R4/SUB - R7	Oppose		Refer to SUB - R7 below.
Buller District Council (S538)	S538.211	Ecosystems and Indigenous Biodiversity	ECO - R4/SUB - R7	Oppose in part	Council considers that legal protection for an area of significant indigenous biodiversity can be achieved by means other than just conservation covenants e.g. consent notices and seeks that the protection mechanism is left unspecified.	Amend Rule 4 as follows: 2. The area of significant indigenous biodiversity is legally protected in perpetuity <del>by way of a conservation covenant with an authorised agency</del> and is contained within a single allotment.
Westpower Limited (S547)	S547.268	Ecosystems and Indigenous Biodiversity	ECO - R4/SUB - R7	Amend	Network utilities and critical infrastructure are also subject to Rule SUB-R2.	Amend Advice Note: This rule ... which are subject to <b>either of Rules SUB-R2 or</b> SUB-R4.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.219	Ecosystems and Indigenous Biodiversity	ECO - R4/SUB - R7	Amend	The rule heading suggests that the purpose of the subdivision it to contain an SNA rather that to capture any subdivision on a site which contains a Significant Natural Area or part of such an area.	1. Amend: Subdivision of Land to Create Allotments <del>on a site with-Containing an Area of a Significant Natural Area Indigenous Biodiversity</del>  Activity Status: Controlled Where: X. <b>An assessment of the site against the significance criteria in Appendix 1 of the WCRPS is provided with the application and applicant can demonstrate the adequacy of this assessment; and</b> 1...3. The subdivision will not result in buildings or access ways being located within the identified area of significant indigenous biodiversity or the need for clearance of significant indigenous vegetation to provide for <b>a future building site or future</b> access to any site; and 4. Subdivision standards S2-S11 are complied with. Matters of control are: a. ...;

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						x. <b>the inclusion of covenants on the titles including for the location of residential building platforms and access;</b> b. ...d.The measures to <del>minimise</del> <b>avoid, remedy, or mitigate</b> any adverse effects on: i. The significant indigenous biodiversity; ii. The cultural significance to Poutini Ngāi Tahu. ...
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.502	Ecosystems and Indigenous Biodiversity	ECO - R4/SUB - R7	Amend	Activities that would not protect SNAs should not be anticipated within them. This requires a non-complying activity status.	Amend: Activity status where compliance not achieved as follows: <del>N/A</del> <b>Where Condition 1 is not achieved Rules ECO - R7A Discretionary or ECO - R8A Non-complying apply.</b>
Department of Conservation (S602)	S602.077	Ecosystems and Indigenous Biodiversity	ECO - R4/SUB - R7	Oppose	This rule duplicates Subdivision Rule SUB-R7 and is unnecessary in the ECO section of the Plan.	Delete Rule ECO - R4.
Avery Brothers (S609)	S609.039	Ecosystems and Indigenous Biodiversity	ECO - R4/SUB - R7	Amend	The provision heading is unclear	Amend heading to read: Subdivision to create allotment(s) of Land Containing <del>an</del> a <b>Scheduled</b> Area of Significant Indigenous Biodiversity.
Avery Brothers (S609)	S609.102	Ecosystems and Indigenous Biodiversity	ECO - R4/SUB - R7	Support	Point 3 should allow biodiversity offsetting or compensation etc. to be considered within this point.	Amend to: The subdivision will not result in buildings or access ways being located within the identified area of significant indigenous biodiversity or the need for clearance of significant indigenous vegetation to provide for future access to any site <b>unless adverse effects can be addressed by alternative mitigation measures such as biodiversity offsetting and environmental compensation; and...</b>
Avery Brothers (S609)	S609.103	Ecosystems and Indigenous Biodiversity	ECO - R4/SUB - R7	Amend	Point 2 is not necessary and a SNA does not need to be within a single allotment.	Delete point 2.

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Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.148	Ecosystems and Indigenous Biodiversity	ECO - R4/SUB - R7	Amend	The matters of control do not include all the matters that ECO-P7 requires to be considered including clause (c) providing for Poutini Ngāi Tahu values, rights and interests.	Amend the matters of control to include <b>Poutini Ngai Tahu values, rights and interests</b> and other relevant matters listed in ECO- P7.
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.330	Ecosystems and Indigenous Biodiversity	ECO - R5	Support	We support this rule.	Retain rule.
Transpower New Zealand Limited (S299)	S299.077	Ecosystems and Indigenous Biodiversity	ECO - R5	Support	ECO-R5 appears to be the default rule for indigenous vegetation clearance relating to the National Grid that is not permitted (nor within a specified area). Transpower supports the inclusion of functional or operational need for critical infrastructure as a matter for discretion.	Retain ECO-R7 on the basis the National Grid is retained within ECO-R1 and R2. Retain functional or operational need for critical infrastructure as a matter for discretion.
KiwiRail Holdings Limited (S442)	S442.053	Ecosystems and Indigenous Biodiversity	ECO - R5	Support	KiwiRail supports matter of discretion b. which considers the constraints imposed by functional or operational need of critical infrastructure.	Retain as proposed
TiGa Minerals and Metals Limited (S493)	S493.056	Ecosystems and Indigenous Biodiversity	ECO - R5	Amend	The functional and/or operational need to carry out such vegetation clearance.	Include functional and operational need in ECO - P7 as per relief sought above, and/or amend ECO - R5as follows:  Discretion is restricted to: a.... g. Effects on recreational values of public land; <del>and</del> h. The matters outlined in Policies ECO - P6 and ECO - P7; <b>and i. The functional or operational need for the activity to locate within the areawhere indigenous vegetation clearance is proposed to occur.</b>
Steve Croasdale (S516)	S516.042	Ecosystems and Indigenous Biodiversity	ECO - R5	Amend	I believe this is too restrictive.	Amend to be more enabling of development.

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Federated Farmers of New Zealand (S524)	S524.068	Ecosystems and Indigenous Biodiversity	ECO - R5	Oppose in part	Changes are sought to ECO-R1 to provide for a controlled activity rule where the standards cannot be met.	Amend to a controlled activity rule
Neil Mouat (S535)	S535.067	Ecosystems and Indigenous Biodiversity	ECO - R5	Oppose in part	We believe this is too restrictive.	Amend to be more enabling of development.
Buller District Council (S538)	S538.212	Ecosystems and Indigenous Biodiversity	ECO - R5	Support	Rule 5 is supported.	Retain as notified.
Westpower Limited (S547)	S547.269	Ecosystems and Indigenous Biodiversity	ECO - R5	Amend	Subsequent amendment ECO-R2 is relocated to the Coastal Environment chapter.	Where Rule ECO-R2 is relocated to the Coastal Environment Chapter replicate this rule.
Westpower Limited (S547)	S547.270	Ecosystems and Indigenous Biodiversity	ECO - R5	Amend	To cover significant vegetation clearance in Westland and Buller, within unclassified SNA.	Consider deletion of item 1.i. for consistency of administration across the region.
Westpower Limited (S547)	S547.271	Ecosystems and Indigenous Biodiversity	ECO - R5	Amend	Item "1.ii" requires amendment to be consistent with Policy 2.(c), Chapter 7 of the RPS.	Amend item 1.ii An area of land ... Environment Classification <b>at the ecological district level.</b>
Westpower Limited (S547)	S547.272	Ecosystems and Indigenous Biodiversity	ECO - R5	Amend	Amendment for wording consistency within the plan and with the RPS.	Amend b. <del>Constraints imposed by</del> <b>The technical, locational, functional or operational need of network utility constraints or requirements of energy activities and infrastructure, including critical infrastructure and renewable energy generation.</b>
Westpower Limited (S547)	S547.273	Ecosystems and Indigenous Biodiversity	ECO - R5	Amend	Add a new matter of discretion regarding the benefits arising from the activity.	Add new i. <b>The benefits arising from the proposed activity.</b>
Buller Conservation Group (S552)	S552.078	Ecosystems and Indigenous Biodiversity	ECO - R5	Support	This is a robust set of considerations.	Retain
Frida Inta (S553)	S553.078	Ecosystems and Indigenous Biodiversity	ECO - R5	Support	Discretion is restricted to a - h This is a robust set of considerations.	retain
Chris & Jan Coll (S558)	S558.104	Ecosystems and Indigenous Biodiversity	ECO - R5	Amend	We believe this is too restrictive.	Amend to be more enabling of development.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.220	Ecosystems and Indigenous Biodiversity	ECO - R5	Amend	Given the deletion of ECO-R3 and incorporation of those activities in to ECO-R5 which Forest & Bird seeks above there is no need to refer to compliance with controlled rules in the rule heading.	1. Amend ECO - R5 as follows: Indigenous vegetation clearance not meeting Permitted <b>Rule ECO-R1</b> or <del>Controlled Activity Standards</del>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.494	Ecosystems and Indigenous Biodiversity	ECO - R5	Amend	Consequential amendment	Amend ECO - R5 to include specific provision for indigenous vegetation clearance or disturbance where this is in accordance with an approved Plan or permit issued under the Forests Act 1949 as follows: "Where: ... <b>4. The indigenous vegetation clearance or disturbance is in accordance with an approved Plan or permit issued under the Forests Act 1949 and is outside the Coastal Environment; and ...</b> "  3. Amend ECO- R5 "Activity status where compliance is not achieved" so that non-compliance with the new condition 4 added above becomes discretionary and becomes noncomplying within a significant natural area.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.496	Ecosystems and Indigenous Biodiversity	ECO - R5	Amend	Forest & Bird considers that this rule should be amended to specifically provide for the maintenance and purposes we consider appropriate for ECO-R1 where the limits in that rule are not met.	Activity Status Restricted Discretionary Where: <b>The clearance is for the purposes and activities specified in Condition 2 of Rule ECO-R1; or the clearance is for the purpose of upgrading or construction of the National Grid where: a. The works corridor does not exceed 3m in width; and b. All machinery used in construction is cleaned and made free of weed material and seeds prior to entering the site; and c. Rehabilitation of disturbed areas is undertaken following the completion of construction; or 3. The clearance is for the purpose to upgrade or create new public walking or cycling tracks up to 3m in width undertaken by the Council or its approved contractor; or 4. The indigenous vegetation clearance or</b>

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						disturbance is in accordance with an approved Plan or permit issued under the Forests Act 1949 and is outside the Coastal Environment; and ...
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.497	Ecosystems and Indigenous Biodiversity	ECO - R5	Amend	the upgrading and construction of National Grid activities supported by national policy direction within limits may be appropriately considered here rather than in ECO -R1 as appropriate matters of restriction can be identified.	...6. An assessment in accordance with Appendix 1 of the WCRPS demonstrates that the clearance and disturbance is not within a Significant Natural Area(s); and Discretion is restricted to: Whether there are other regulations impacting the site that have meant the land is unable to be used for economic rural uses; Constraints imposed by b. The functional or operational need of the national grid for the location network utilities and critical infrastructure; ...
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.498	Ecosystems and Indigenous Biodiversity	ECO - R5	Support	Matter c should include "at risk" to align with the NZCPS.	...c. Effects on habitats of any threatened, at risk, or protected species; ..
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.499	Ecosystems and Indigenous Biodiversity	ECO - R5	Amend	In matter h. of the restriction of discretion it would be clearer to use wording that captures the matters rather than refer to specific policy.	h. The maintenance and protection of indigenous biodiversity matters outlined in Policies ECO - P6 and ECO - P7.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.500	Ecosystems and Indigenous Biodiversity	ECO - R5	Amend	A consequential amendment should be made to Advice not 1 for consistency. Advice note 4 is no longer required given the limited activities provided under condition 1, 2 and 3.	Amend Advice Note: 1. Where indigenous vegetation clearance is proposed within the riparian margin of a waterbody also refer to the Natural Character and the Margins of Waterbodies (NC) chapter provisions. this section of the Plan for the Rules around this clearance. 2. Where indigenous vegetation clearance is proposed in or on a site or area of significance to Māori then Rule SASM - R4 will also apply.



Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						3. Where indigenous vegetation clearance is proposed within a wetland this is also subject to rules within the NES - Freshwater and Regional Land and Water Plan which are administered by the West Coast Regional Council. 4. <del>This rule also applies to Plantation forestry activities, where this provision is more stringent than the NES - PF and the indigenous vegetation clearance is within the coastal environment.</del> "
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.501	Ecosystems and Indigenous Biodiversity	ECO - R5	Amend	Under the activity status where compliance is not achieved it would be helpful to state the Discretionary rules that apply.	Under the activity status where compliance is not achieved make amendments as necessary to state the specific Discretionary rules that apply, for example ECO - R7 and the relevant CE rules.
Geoff Volckman (S563)	S563.031	Ecosystems and Indigenous Biodiversity	ECO - R5	Oppose in part	We believe this is too restrictive.	Amend to be more enabling of development.
Catherine Smart-Simpson (S564)	S564.037	Ecosystems and Indigenous Biodiversity	ECO - R5	Amend	this is too restrictive.	Amend to be more enabling of development.
Chris J Coll Surveying Limited (S566)	S566.104	Ecosystems and Indigenous Biodiversity	ECO - R5	Amend	We believe this is too restrictive.	Amend to be more enabling of development.
William McLaughlin (S567)	S567.185	Ecosystems and Indigenous Biodiversity	ECO - R5	Amend	We believe this is too restrictive.	Amend to be more enabling of development.
Laura Coll McLaughlin (S574)	S574.104	Ecosystems and Indigenous Biodiversity	ECO - R5	Amend	We believe this is too restrictive.	Amend to be more enabling of development.
Koiterangi Lime Co LTD (S577)	S577.044	Ecosystems and Indigenous Biodiversity	ECO - R5	Support	Too restrictive.	Amend to be more enabling of development.
WMS Group (HQ) Limited and WMS Land Co. Limited (S599)	S599.060	Ecosystems and Indigenous Biodiversity	ECO - R5	Amend	Activity status for indigenous vegetation clearance not meeting permitted or controlled activity standards	Include functional and operational need in ECO - P7 as per relief sought above, and/or amend ECO - R5 as follows: Discretion is restricted to: a. Whether there are other regulations

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<p>impacting the site that have meant the land is unable to be used for economic rural uses;</p> <p>b. Constraints imposed by functional or operational need of network utilities and critical infrastructure;</p> <p>c. Effects on habitats of any threatened or protected species;</p> <p>d. Effects on the threat status of land environments in category one or two of the Threatened Environments Classification;</p> <p>e. Effects on ecological functioning and the life supporting capacity of air, water, soil and ecosystems;</p> <p>f. Effects on the intrinsic values of ecosystems;</p> <p>g. Effects on recreational values of public land; <del>and</del></p> <p>h. The matters outlined in Policies ECO - P6 and ECO - P7; <b>and</b></p> <p><b>i. The functional or operational need for the activity to locate within the area where indigenous vegetation clearance is proposed to occur.</b></p>
Birchfield Coal Mines Ltd (S601)	S601.042	Ecosystems and Indigenous Biodiversity	ECO - R5	Amend	Should include a matter to be considered on the functional and/or operational need	<p>Amend to read: Discretion is restricted to: a. ... <b>and i. The functional or operational need for the activity to locate within the area where indigenous vegetation clearance is proposed to occur.</b></p>
Department of Conservation (S602)	S602.078	Ecosystems and Indigenous Biodiversity	ECO - R5	Amend	Support Rule ECO-R5 and amend it to remove ambiguity and ensure any application made under this rule assesses the adverse effects on Threatened or At Risk (Declining) species.	<p>Amend: Activity Status Restricted Discretionary Where:</p> <p>1. This is not within:</p> <p>i. A Significant Natural Area identified in Schedule Four <b>or in accordance with the Significant Natural Area criteria;</b></p> <p>ii. An area of land environment of category one or two of the Threatened Environment Classification;</p> <p>iii. An Outstanding Natural Landscape identified in</p>

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<p>Schedule Five;  iv. An Outstanding Natural Feature identified in Schedule Six;  v. An area of High Coastal Natural Character identified in Schedule Seven; or  vi. An area of Outstanding Coastal Natural Character identified in Schedule Eight.  Discretion is restricted to:  2. Whether there are other regulations impacting the site that have meant the land is unable to be used for economic rural uses; <del>3. Constraints imposed by</del> <b>consideration of the</b> functional or operational need of network utilities and critical infrastructure;  4. Effects on habitats of <del>any threatened or protected species</del> <b>threatened or At Risk (Declining) species;</b>  5. Effects on the threat status of land environments in category one or two of the Threatened Environments Classification;  6. Effects on ecological functioning and the life supporting capacity of air, water, soil and ecosystems;  7. Effects on the intrinsic values of ecosystems;  8. Effects on recreational values of public land; and  9. The matters outlined in Policies ECO - P6 and ECO - P7.</p> <p>Advice Note: <b>1. For the avoidance of doubt, any area of vegetation that meets the criteria set out in Appendix 1 of the West Coast Regional Policy Statement (until such time as nationally consistent criteria apply through a National Policy Statement or National Environmental Standards) is a Significant Natural Area, and this rule does not apply.</b> 2. Where indigenous vegetation clearance is proposed within the riparian margin of a waterbody refer to this section of the Plan for the</p>

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<p><b>additional</b> Rules around this clearance.</p> <p>3. Where indigenous vegetation clearance is proposed in or on a site or area of significance to Māori then Rule SASM - R4 will also apply.</p> <p>4. Where indigenous vegetation clearance is proposed within a wetland this is also be subject to rules within the NES Freshwater and Regional Land and Water Plan which are administered by the West Coast Regional Council.</p> <p>5. This rule also applies to plantation forestry activities, where this provision is more stringent than the NES - PF and the indigenous vegetation clearance is within the coastal environment</p>
BRM Developments Limited (S603)	S603.069	Ecosystems and Indigenous Biodiversity	ECO - R5	Amend	activity status for indigenous vegetation clearance not meeting permitted or controlled activity standards is supported	<p>Include functional and operational need in ECO - P7 as per relief sought above, and/or amend ECO - R5 as follows:</p> <p>Discretion is restricted to:</p> <p>a. ...g. Effects on recreational values of public land; <del>and</del></p> <p>h. The matters outlined in Policies ECO - P6 and ECO - P7; <b>and</b></p> <p><b>i. The functional or operational need for the activity to locate within the areawhere indigenous vegetation clearance is proposed to occur.</b></p>
Birchfield Ross Mining Limited (S604)	S604.036	Ecosystems and Indigenous Biodiversity	ECO - R5	Amend	The functional and/or operational need of the activity to carry out such vegetation clearance.	<p>Amend: Discretion is restricted to: a. ; <del>and</del> h. The matters outlined in Policies ECO - P6 and ECO - P7; <b>and i. The functional or operational need for the activity to locate within the area where indigenous vegetation clearance is proposed to occur.</b></p>
Birchfield Ross Mining Limited (S604)	S604.115	Ecosystems and Indigenous Biodiversity	ECO - R5	Amend	The functional and/or operational need of the activity to carry out such vegetation clearance.	Include functional and operational need as in ECO - P7 as per relief sought above

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Phoenix Minerals Limited (S606)	S606.093	Ecosystems and Indigenous Biodiversity	ECO - R5	Amend	add a matter on the functional and/or operational need of the activity	Include functional and operational need in ECO -P7 as per relief sought above, and/or amend ECO - R5 as follows: Discretion is restricted to: a. ...; and i. <b>The functional or operational need for the activity to locate within the area where indigenous vegetation clearance is proposed to occur.</b>
Whyte Gold Limited (S607)	S607.030	Ecosystems and Indigenous Biodiversity	ECO - R5	Amend	A matter which should also be considered is the functional and/or operational need of the activity	Amend ECO - P7: Discretion is restricted to: ... and h. The matters outlined in Policies ECO - P6 and ECO - P7; and i. <b>The functional or operational need for the activity to locate within the area where indigenous vegetation clearance is proposed to occur.</b>
Karamea Lime Company (S614)	S614.053	Ecosystems and Indigenous Biodiversity	ECO - R5	Amend	Believe this is too restrictive.	Amend to be more enabling of development.
Peter Langford (S615)	S615.053	Ecosystems and Indigenous Biodiversity	ECO - R5	Amend	Believe this is too restrictive.	Amend to be more enabling of development.
Snodgrass Road submitters (S619)	S619.032	Ecosystems and Indigenous Biodiversity	ECO - R5	Support	Resource consent application be made for an activity which does not meet permitted activity rules.	Retain Rule ECO-R5.
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.149	Ecosystems and Indigenous Biodiversity	ECO - R5	Amend	The rule does not cover activities within a SNA, ONL, threatened environment, ONF, HCHC and OHNC.	either amend ECO-P7, or include <b>Poutini Ngai Tahu rights, values and interests</b> and other relevant matters listed in ECO- P7 as a matter of discretion
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.331	Ecosystems and Indigenous Biodiversity	ECO - R6/SUB - R9	Support	We support this rule.	Retain rule.
Leonie Avery (S507)	S507.042	Ecosystems and Indigenous Biodiversity	ECO - R6/SUB - R9	Oppose in part		Not stated.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Jared Avery (S508)	S508.042	Ecosystems and Indigenous Biodiversity	ECO - R6/SUB - R9	Oppose in part		Not stated
Kyle Avery (S509)	S509.042	Ecosystems and Indigenous Biodiversity	ECO - R6/SUB - R9	Oppose in part		Not stated
Avery Bros (S510)	S510.042	Ecosystems and Indigenous Biodiversity	ECO - R6/SUB - R9	Oppose in part		
Bradshaw Farms (S511)	S511.042	Ecosystems and Indigenous Biodiversity	ECO - R6/SUB - R9	Oppose in part		
Paul Avery (S512)	S512.042	Ecosystems and Indigenous Biodiversity	ECO - R6/SUB - R9	Oppose in part		
Brett Avery (S513)	S513.042	Ecosystems and Indigenous Biodiversity	ECO - R6/SUB - R9	Oppose in part		
Neil Mouat (S535)	S535.018	Ecosystems and Indigenous Biodiversity	ECO - R6/SUB - R9	Oppose in part		Refer to SUB - R9 below.
Buller District Council (S538)	S538.213	Ecosystems and Indigenous Biodiversity	ECO - R6/SUB - R9	Oppose in part	Council considers that legal protection for an area of significant indigenous biodiversity can be achieved by means other than just conservation covenants e.g. consent notices and seeks that the protection mechanism is left unspecified.	Amend Rule 6 as follows: 2. The area of significant indigenous biodiversity is legally protected in perpetuity <del>by way of a conservation covenant with an authorised agency</del> and is contained within a single allotment.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.221	Ecosystems and Indigenous Biodiversity	ECO - R6/SUB - R9	Amend	The rule is similar to ECO - R4 and requires similar amendments for the same reasons.	Amend: Subdivision of Land to create Allotments <del>on a site with-Containing an Area of a Significant Natural Area Indigenous Biodiversity</del> not meeting Rule ECO - R4 Activity Status Restricted Discretionary Where: <b>X. An assessment of the site against the significance criteria in Appendix 1 of the WCRPS is provided with the application and applicant can demonstrate the adequacy of this assessment; and</b>

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						1. ...3. The subdivision will not result in buildings or access ways being located within any Significant Natural Area identified in Schedule Four <b>or the need for clearance of significant indigenous vegetation to provide for a future building site or future access to any site</b> ; and Subdivision standards S2-S11 are complied with. Discretion is restricted to: a. ....b. ... <b>x. the inclusion of covenants on the title including for the location of residential building platforms and access;</b> c. ... e. The measures to <del>minimise</del> <b>avoid, remedy, or mitigate</b> any adverse effects on: ...
Department of Conservation (S602)	S602.079	Ecosystems and Indigenous Biodiversity	ECO - R6/SUB - R9	Oppose	This rule duplicates Subdivision Rule SUB-R9 and is unnecessary in the ECO section of the Plan.	Delete.
Avery Brothers (S609)	S609.040	Ecosystems and Indigenous Biodiversity	ECO - R6/SUB - R9	Amend	The provision is unclear given SNAs are yet to be mapped	Amend heading to read: Subdivision of Land to create allotment(s) Containing <del>an a</del> <b>Scheduled</b> Area of Significant Indigenous Biodiversity not meeting Rule SUB - R7.
Avery Brothers (S609)	S609.099	Ecosystems and Indigenous Biodiversity	ECO - R6/SUB - R9	Amend	Point 2 is not necessary	Delete Point 2.
Avery Brothers (S609)	S609.100	Ecosystems and Indigenous Biodiversity	ECO - R6/SUB - R9	Amend	Point 3 should allow biodiversity offsetting or compensation etc. to be considered within this point.	The subdivision will not result in buildings or access ways being located within any Significant Natural Area identified in Schedule Four <b>unless adverse effects can be addressed by alternative mitigation measures such as biodiversity offsetting and environmental compensation</b> ; and...
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.150	Ecosystems and Indigenous Biodiversity	ECO - R6/SUB - R9	Amend	Does not include all the matters that ECO-P7 requires to be considered including clause (c)	Amend the list of discretions to include <b>Poutini Ngai Tahu values, rights and interests</b> and other relevant matters listed in ECO- P7.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.332	Ecosystems and Indigenous Biodiversity	ECO - R7	Support	We support this rule.	Retain rule.
Transpower New Zealand Limited (S299)	S299.078	Ecosystems and Indigenous Biodiversity	ECO - R7	Support	Transpower supports the discretionary activity status. The activity status and associated policies in the Energy Chapter and ECO-P7 provide an appropriate framework in which to manage the National Grid, noting that these provisions would only apply to 'installation' of National Grid activities, as other activities are managed under the NESETA.	Retain the rule
Bathurst Resources Limited and BT Mining Limited (S491)	S491.020	Ecosystems and Indigenous Biodiversity	ECO - R7	Amend	This rule needs to acknowledge the lawfully established activities.	Amend Advice Note: 1. Where assessing resource consents for indigenous vegetation clearance under this rule, assessment against <b>the objectives</b> and policies <b>of the MINZ, and BCZ zones, and of both</b> the Ecosystems and Biodiversity Chapter, and Natural Features and Landscapes Chapters will be required. 2. This rule also applies to plantation forestry activities, where this provision is more stringent than the NES - PF.
TiGa Minerals and Metals Limited (S493)	S493.057	Ecosystems and Indigenous Biodiversity	ECO - R7	Support	The discretionary activity status for vegetation clearance within the specified areas is supported	Retain as notified.
Steve Croasdale (S516)	S516.043	Ecosystems and Indigenous Biodiversity	ECO - R7	Support	I believe this is too restrictive.	Amend to be more enabling of development.
Neil Mouat (S535)	S535.068	Ecosystems and Indigenous Biodiversity	ECO - R7	Oppose in part	We believe this is too restrictive.	Amend to be more enabling of development.
Buller District Council (S538)	S538.214	Ecosystems and Indigenous Biodiversity	ECO - R7	Support	Rule 7 is supported.	Retain as notified.



Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Westpower Limited (S547)	S547.274	Ecosystems and Indigenous Biodiversity	ECO - R7	Amend	Refer to objectives and clarify when assessment is required.	Amend 1. Where ... assessment against the <b>objectives and</b> policies of both the ...will be required <b>where relevant</b> .
Chris & Jan Coll (S558)	S558.105	Ecosystems and Indigenous Biodiversity	ECO - R7	Amend	We believe this is too restrictive.	Amend to be more enabling of development.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.222	Ecosystems and Indigenous Biodiversity	ECO - R7	Amend	To ensure protection of significant natural areas that are not yet identified in the Plan an assessment against the WCRPS Appendix 1 significance criteria is required.	Amend: <b>Where: 1. An assessment in accordance with Appendix 1 of the WCRPS demonstrates that the clearance and disturbance is not within a Significant Natural Area(s).</b>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.504	Ecosystems and Indigenous Biodiversity	ECO - R7	Amend		Add a new ECO Non-complying rule as follows: <b>ECO - R8A vegetation clearance not meeting ECO - R7AActivity Status Non-ComplyingAdvice Note:1. This rule also applies to Plantation forestry activities, where this provision is more stringent than the NES - PF.Activity status where compliance not achieved: N/A</b>
Geoff Volckman (S563)	S563.032	Ecosystems and Indigenous Biodiversity	ECO - R7	Oppose in part	We believe this is too restrictive.	Amend to be more enabling of development.
Catherine Smart-Simpson (S564)	S564.038	Ecosystems and Indigenous Biodiversity	ECO - R7	Amend	this is too restrictive.	Amend to be more enabling of development.
Chris J Coll Surveying Limited (S566)	S566.105	Ecosystems and Indigenous Biodiversity	ECO - R7	Amend	We believe this is too restrictive.	Amend to be more enabling of development.
William McLaughlin (S567)	S567.186	Ecosystems and Indigenous Biodiversity	ECO - R7	Amend	We believe this is too restrictive.	Amend to be more enabling of development.
Laura Coll McLaughlin (S574)	S574.105	Ecosystems and Indigenous Biodiversity	ECO - R7	Amend	We believe this is too restrictive.	Amend to be more enabling of development.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Koiterangi Lime Co LTD (S577)	S577.045	Ecosystems and Indigenous Biodiversity	ECO - R7	Support	this is too restrictive.	Amend to be more enabling of development.
WMS Group (HQ) Limited and WMS Land Co. Limited (S599)	S599.061	Ecosystems and Indigenous Biodiversity	ECO - R7	Support	The discretionary activity status for vegetation clearance within the specified areas is supported	Retain as notified.
Birchfield Coal Mines Ltd (S601)	S601.043	Ecosystems and Indigenous Biodiversity	ECO - R7	Support	The discretionary activity status for vegetation clearance within the specified areas is supported	Retain as notified.
Department of Conservation (S602)	S602.080	Ecosystems and Indigenous Biodiversity	ECO - R7	Support	Support Rule ECO - R7.	Support Rule ECO - R7 in its entirety.
BRM Developments Limited (S603)	S603.032	Ecosystems and Indigenous Biodiversity	ECO - R7	Support	The discretionary activity status for vegetation clearance within the specified areas	Retain as notified.
Birchfield Ross Mining Limited (S604)	S604.037	Ecosystems and Indigenous Biodiversity	ECO - R7	Support	The discretionary activity status for vegetation clearance	Retain as notified.
Phoenix Minerals Limited (S606)	S606.033	Ecosystems and Indigenous Biodiversity	ECO - R7	Support	Activity status is supported	Retain as notified.
Whyte Gold Limited (S607)	S607.031	Ecosystems and Indigenous Biodiversity	ECO - R7	Support	The activity status is supported	Retain as notified.
Karamea Lime Company (S614)	S614.054	Ecosystems and Indigenous Biodiversity	ECO - R7	Amend	Believe this is too restrictive	Amend to be more enabling of development.
Peter Langford (S615)	S615.054	Ecosystems and Indigenous Biodiversity	ECO - R7	Amend	Believe this is too restrictive	Amend to be more enabling of development.
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.142	Ecosystems and Indigenous Biodiversity	ECO - R7	Support	matters (c) and (f) allow direct consideration of Poutini Ngāi Tahu values, rights and interests.	Retain (c) and (f) as notified
Te Mana Ora (Community and Public Health) of the	S190.333	Ecosystems and Indigenous Biodiversity	ECO - R8/SUB - R15	Support	We support this rule.	Retain rule.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
NPHS/ Te Whatu Ora (S190)						
Leonie Avery (S507)	S507.043	Ecosystems and Indigenous Biodiversity	ECO - R8/SUB - R15	Oppose in part		Not stated.
Jared Avery (S508)	S508.043	Ecosystems and Indigenous Biodiversity	ECO - R8/SUB - R15	Oppose in part		Not stated
Kyle Avery (S509)	S509.043	Ecosystems and Indigenous Biodiversity	ECO - R8/SUB - R15	Oppose in part		Not stated
Avery Bros (S510)	S510.043	Ecosystems and Indigenous Biodiversity	ECO - R8/SUB - R15	Oppose in part		
Bradshaw Farms (S511)	S511.043	Ecosystems and Indigenous Biodiversity	ECO - R8/SUB - R15	Oppose in part		
Paul Avery (S512)	S512.043	Ecosystems and Indigenous Biodiversity	ECO - R8/SUB - R15	Oppose in part		
Brett Avery (S513)	S513.043	Ecosystems and Indigenous Biodiversity	ECO - R8/SUB - R15	Oppose in part		
Neil Mouat (S535)	S535.019	Ecosystems and Indigenous Biodiversity	ECO - R8/SUB - R15	Oppose in part		Refer to SUB - R15 below.
Buller District Council (S538)	S538.215	Ecosystems and Indigenous Biodiversity	ECO - R8/SUB - R15	Oppose in part	<p>Council is concerned that Rule 8 is too restrictive and seeks that subdivision of land that does not meet Rule 6 should be a discretionary activity without qualification. This will then allow subdivision proposals to be considered on their respective merits and allow consideration of not only any legal protection mechanisms but any potential offsetting or compensation measures that may be proposed.</p> <p>Notwithstanding the change sought, it is</p>	Amend Rule 8 as follows: Delete the 3 performance standards and delete the 'non-complying' default activity status.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					noted that Clause 3 is not relevant to indigenous vegetation clearance rules.	
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.223	Ecosystems and Indigenous Biodiversity	ECO - R8/SUB - R15	Amend	The rule heading needs clarification for the reasons set out at ECO - R4/SUB - R6. Other consequential amendments are also required to use the WCRPS defined term Significant Natural Area and to clarify rules that apply where compliance is not achieved.	Amend Rule ECO - R8/SUB - R15 as follows "Subdivision of Land to Create Allotments <b>on a site with-Containing an Area of a Significant Natural Area Indigenous Biodiversity</b> not meeting Rule ECO - R6 Activity Status Discretionary Where: The <b>Significant Natural Area</b> <del>area of significant indigenous biodiversity</del> is legally protected in perpetuity by way of a conservation covenant with an authorised agency and is contained within a single allotment; The subdivision will not result in buildings or accessways being located within any Significant Natural Area identified in Schedule Four; and 3. Subdivision Standards S2 - S11 are complied with. Activity status where compliance not achieved: Non-complying <b>under ECO - R9/SUB - R27.</b> "
Department of Conservation (S602)	S602.081	Ecosystems and Indigenous Biodiversity	ECO - R8/SUB - R15	Oppose	This rule duplicates Subdivision Rule SUB-R15 and is unnecessary in the ECO section of the Plan.	Delete Rule ECO - R8.
Avery Brothers (S609)	S609.041	Ecosystems and Indigenous Biodiversity	ECO - R8/SUB - R15	Amend	Activity status where there is noncompliance should be deleted as there should be no escalation to Non-Complying status.	Delete points 1 and 2
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.334	Ecosystems and Indigenous Biodiversity	ECO - R9/SUB - R27	Support	We support this rule.	Retain rule.
Leonie Avery (S507)	S507.044	Ecosystems and Indigenous Biodiversity	ECO - R9/SUB - R27	Oppose		Not stated.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Jared Avery (S508)	S508.044	Ecosystems and Indigenous Biodiversity	ECO - R9/SUB - R27	Oppose		Not stated
Kyle Avery (S509)	S509.044	Ecosystems and Indigenous Biodiversity	ECO - R9/SUB - R27	Oppose		Not stated
Avery Bros (S510)	S510.044	Ecosystems and Indigenous Biodiversity	ECO - R9/SUB - R27	Oppose		
Bradshaw Farms (S511)	S511.044	Ecosystems and Indigenous Biodiversity	ECO - R9/SUB - R27	Oppose		
Paul Avery (S512)	S512.044	Ecosystems and Indigenous Biodiversity	ECO - R9/SUB - R27	Oppose		
Brett Avery (S513)	S513.044	Ecosystems and Indigenous Biodiversity	ECO - R9/SUB - R27	Oppose		
Neil Mouat (S535)	S535.020	Ecosystems and Indigenous Biodiversity	ECO - R9/SUB - R27	Oppose		Refer to SUB - R27 below.
Buller District Council (S538)	S538.216	Ecosystems and Indigenous Biodiversity	ECO - R9/SUB - R27	Oppose in part	Following on from the change sought above, Council seeks the removal of Rule 9.	Delete Rule 9.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.225	Ecosystems and Indigenous Biodiversity	ECO - R9/SUB - R27	Amend	A non-complying activity status is appropriate to indicate that indigenous vegetation clearance not already provided for subdivision activities would not be anticipated within Significant Natural Areas.	Retain Rule ECO - R9/SUB - R27 with the following amendments: Subdivision of Land within <del>an Area of a Significant Natural Area</del> <b>Indigenous Biodiversity</b> not meeting Rule ECO - R8.
Department of Conservation (S602)	S602.082	Ecosystems and Indigenous Biodiversity	ECO - R9/SUB - R27	Oppose	This rule duplicates Subdivision Rule SUB-R27 and is unnecessary in the ECO section of the Plan.	Delete Rule ECO - R9.
Avery Brothers (S609)	S609.042	Ecosystems and Indigenous Biodiversity	ECO - R9/SUB - R27	Oppose	The rule is too restrictive.	Delete
Te Mana Ora (Community and Public Health) of the	S190.335	Ecosystems and Indigenous Biodiversity	ECO - R10	Support	We support this rule.	Retain rule.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
NPHS/ Te Whatu Ora (S190)						
Steve Croasdale (S516)	S516.044	Ecosystems and Indigenous Biodiversity	ECO - R10	Support		Retain
Buller District Council (S538)	S538.217	Ecosystems and Indigenous Biodiversity	ECO - R10	Support	Rules 10 and 11 are supported.	Retain as notified.
Chris & Jan Coll (S558)	S558.106	Ecosystems and Indigenous Biodiversity	ECO - R10	Support		Retain
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.226	Ecosystems and Indigenous Biodiversity	ECO - R10	Amend	Considering allowing these activities would be contrary to the regional pest Plan and therefore the Biosecurity Act.	Amend ECO - R10 so that it is a prohibited activity
Geoff Volckman (S563)	S563.033	Ecosystems and Indigenous Biodiversity	ECO - R10	Support	We support this rule	Retain
Catherine Smart-Simpson (S564)	S564.039	Ecosystems and Indigenous Biodiversity	ECO - R10	Support		Retain
Chris J Coll Surveying Limited (S566)	S566.106	Ecosystems and Indigenous Biodiversity	ECO - R10	Support		Retain
William McLaughlin (S567)	S567.187	Ecosystems and Indigenous Biodiversity	ECO - R10	Support		Retain
Laura Coll McLaughlin (S574)	S574.106	Ecosystems and Indigenous Biodiversity	ECO - R10	Support		Retain
Koiterangi Lime Co LTD (S577)	S577.046	Ecosystems and Indigenous Biodiversity	ECO - R10	Support		Retain
Karamea Lime Company (S614)	S614.055	Ecosystems and Indigenous Biodiversity	ECO - R10	Support		Retain

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Peter Langford (S615)	S615.055	Ecosystems and Indigenous Biodiversity	ECO - R10	Support		Retain
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.336	Ecosystems and Indigenous Biodiversity	ECO - R11	Support	We support this rule.	Retain rule.
Steve Croasdale (S516)	S516.045	Ecosystems and Indigenous Biodiversity	ECO - R11	Support		Retain
Buller District Council (S538)	S538.218	Ecosystems and Indigenous Biodiversity	ECO - R11	Support	Rules 10 and 11 are supported.	Retain as notified.
Chris & Jan Coll (S558)	S558.107	Ecosystems and Indigenous Biodiversity	ECO - R11	Support		Retain
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.227	Ecosystems and Indigenous Biodiversity	ECO - R11	Support in part	Considering allowing these activities would be contrary to the regional pest Plan and therefore the Biosecurity Act.	Amend ECO - R11 so that it is a prohibited activity.
Geoff Volckman (S563)	S563.034	Ecosystems and Indigenous Biodiversity	ECO - R11	Support	We support this rule	Retain
Catherine Smart-Simpson (S564)	S564.040	Ecosystems and Indigenous Biodiversity	ECO - R11	Support		Retain
Chris J Coll Surveying Limited (S566)	S566.107	Ecosystems and Indigenous Biodiversity	ECO - R11	Support		Retain
William McLaughlin (S567)	S567.188	Ecosystems and Indigenous Biodiversity	ECO - R11	Support		Retain
Laura Coll McLaughlin (S574)	S574.107	Ecosystems and Indigenous Biodiversity	ECO - R11	Support		Retain

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Koiterangi Lime Co LTD (S577)	S577.047	Ecosystems and Indigenous Biodiversity	ECO - R11	Support		Retain
Karamea Lime Company (S614)	S614.056	Ecosystems and Indigenous Biodiversity	ECO - R11	Support		Retain
Peter Langford (S615)	S615.056	Ecosystems and Indigenous Biodiversity	ECO - R11	Support		Retain
Te Tumu Paeroa - The office of the Māori Trustee (S440)	S440.032	Natural Features and Landscapes	NFL	Support	The Māori Trustee is generally comfortable with the rules in the 'Natural features and landscapes' chapter.	N/A
Buller Conservation Group (S552)	S552.226	Natural Features and Landscapes	NFL	Amend		Amend to give specific mention of mature indigenous trees as these individuals or groups often give an area its natural charm and character.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.228	Natural Features and Landscapes	NFL	Support	Support the approach of dealing with vegetation clearance in ONFLs in the ECO chapter.	Retain approach of dealing with vegetation clearance in ECO chapter.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.229	Natural Features and Landscapes	NFL	Support	Support the clear way other relevant chapters are referred to here. Also see Key Issues above for submission on this issue.	Retain method of referring to other chapters clearly.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.232	Natural Features and Landscapes	NFL	Support	Support the references in the rules that any vegetation clearance associated with the various activities is subject to the provisions in the ECO chapter.	Retain references.
WMS Group (HQ) Limited and WMS Land Co. Limited (S599)	S599.062	Natural Features and Landscapes	NFL	Oppose	Concerned at the arbitrary nature of the Outstanding Natural Landscape boundary around Lake Mahinapua, which does not appear to follow any logical topographic or vegetation boundaries.	Remove the Outstanding Natural Landscape overlay on the planning maps from Lot 1 Deposited Plan 3854, and reflect any consent decisions for this parcel of land when making decisions on the ONL boundary.



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Grey District Council (S608)	S608.059	Natural Features and Landscapes	NFL	Oppose in part	controls from SASM overlay is removed	Remove all references to "Site or Area of Significance to Māori" in the Chapter
Westland District Council (S181)	S181.016	Natural Features and Landscapes	Natural Features and Landscapes	Support	Westland District Council supports these Objectives, Policies and Rules	Retain the objectives, policies and rules
Skyline Enterprises Limited (S250)	S250.004	Natural Features and Landscapes	Natural Features and Landscapes	Oppose	It is noted that in the TTPP 'Conservation Activities' are provided for within ONL and ONF's However, it is not clear that providing an Aerial Cableway by a commercial entity (such as the submitter) would fall within the scope of this definition.	That the proposed aerial cableway at Franz Josef should be identified within the provisions in the Natural Features and Landscapes - Ngā Āhua me ngā Horanuku Aotūroa chapter to enable consideration of such a development.
Raylene Black (S420)	S420.001	Natural Features and Landscapes	Natural Features and Landscapes	Amend	Negative impact on property values. Only property in the neighborhood being included in the overlays.	Request property at 1976b Haast Jackson Bay Road to be removed from Outstanding Natural Character and Outstanding Natural Landscapes overlays.
Manawa Energy Limited (Manawa Energy) (S438)	S438.083	Natural Features and Landscapes	Natural Features and Landscapes	Not Stated	Manawa has significant concerns regarding the approach taken to identification and protection of outstanding natural features and landscapes. The approach does not appear to be robust or based on current best practice in undertaking such work for a District Plan. Manawa considers that this section needs to clearly identify the manner in which the identification, management and protection of ONFL will be achieved. The policy structure at present lacks an identification of ONL / or criteria / or methodology used; and subsequently progresses straight to the manner in which activities are enabled, provided for, managed and avoided. As a result it does not recognise the location of existing modifications to this landscape - a matter which Manawa considers to be a fundamental flaw (and envisages that this	Revise the policies to properly work through the approach to identification, management and protection of ONFL. Revise the policies to clearly articulate the criteria and methodology for identification of ONFL. Revise the policies to provide a clear hierarchy through specific wording that steps through what is enabled, provided for, managed and avoided. Do not use the term 'minimise' as this has no agreed meaning and would be better with 'manage' which covers a range of methods, or avoid/remedy/mitigate as clearly understood terms. Amend the landscape study and associated landscape schedules to include: •descriptions and characterisations of landscape generally •identification of values within each of the ONFL •identification of existing activities and modifications within the ONFL.

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					<p>will become problematic at the stage in which resource consent applications to undertake activities in ONFLs are processed and assessed). Manawa also considers that the methodology used for the Landscape Study is flawed. This flawed methodology has resulted in substantial errors in the mapping and identification of landscapes within the pTTPP. The methodology utilised has not appropriately articulated descriptions and characterisations of landscape generally (only outstanding landscapes), nor has it provided the identification of values within each of the ONFL. These flaws also lead to inaccuracies of mapping of ONFL areas as this has been done inaccurately and at an inappropriate scale. Some of these submission points are dealt with in more detail in relation to Part 4 of the Plan (Appendices dealing with landscapes) but are interrelated to matters raised in relation to this chapter of the Plan and should be considered collectively.</p>	Amend the mapping of ONFL to improve accuracy and to follow best practice.
Hadley Mills (S534)	S534.002	Natural Features and Landscapes	Natural Features and Landscapes	Oppose	<p>I consider the basis of the assessment is incorrect and that the ONLs have been assessed at a National or International Scale not at a district/regional level, with insufficient ground truthing to justify assigning Outstanding status to 1.8million hectares of land.</p>	<p>Remove the policy framework for ONLs and add a new policy outlining how the Conservation Act already provides for RMA S6(b) protection OR Remove the ONL overlay (keeping the relative policy framework) and insert a new policy that simply states - ONLs will be assessed, identified and mapped, strictly within the context of the West Coast, using a robust (including appropriate site by site ground truthing) methodology. This assessment, identification and mapping will occur within 5 years of when this plan comes into effect or when the West</p>

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						Coast Regional Council, who must fund the TTPP, has the appropriate resources to do so.
Westpower Limited (S547)	S547.275	Natural Features and Landscapes	Natural Features and Landscapes	Amend	Failed to recognise and provide for existing energy activities and infrastructure.	Ensure identification of outstanding natural features and landscapes appropriately recognise and provide for the existing energy activities and infrastructure located within them.
Westpower Limited (S547)	S547.276	Natural Features and Landscapes	Natural Features and Landscapes	Amend	Impacts the community in accessing and using renewable energy generation.	Ensure provisions adequately recognise the importance of these activities and infrastructure to the community and the environment within which they must locate or traverse. This includes providing for the maintenance and enhancement of the generation and supply of renewable energy, including new activities, to enable communities.
Buller Conservation Group (S552)	S552.080	Natural Features and Landscapes	Natural Features and Landscapes	Oppose	Sections 7(d): and 5(b) of the RMA: need to be mentioned in the overview.	Amend NFL chapter: ' <b>natural character</b> ' in the objectives and policies, and all rules need to refer to protection of it;
Buller Conservation Group (S552)	S552.227	Natural Features and Landscapes	Natural Features and Landscapes	Amend		Amend to mention ecosystem services. It is at the landscape level that ecosystem services are maintained or, hopefully, enhanced.
Joel and Jennifer Watkins (S565)	S565.035	Natural Features and Landscapes	Natural Features and Landscapes	Support	Protective elements of the plan as they relate to Outstanding Coastal Natural Character and High Coastal Natural Character; and Outstanding Natural Landscapes	Retain
Department of Conservation (S602)	S602.085	Natural Features and Landscapes	Natural Features and Landscapes	Amend	Amend all matters of discretion and control to ensure that the assessment of adverse effects for activities within ONLs and ONF consider the adverse effects on amenity and cultural, historic and ecological values.	Add the following matters of control and discretion to all controlled and restricted discretionary NFL provisions: <ol style="list-style-type: none"> <li>1. <b>Adverse effects on historical, cultural, and biodiversity values;</b></li> <li>2. <b>Amenity and visual effects;</b></li> </ol>

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Department of Conservation (S602)	S602.098	Natural Features and Landscapes	Natural Features and Landscapes	Neutral	DOC is neutral as these do not affect priority conservation values, biodiversity values, or DOC's interests.	NA
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.156	Natural Features and Landscapes	Natural Features and Landscapes	Oppose	There is no information explaining how effects on manawhenua were assessed.	This part of the plan requires further work in consultation with mana whenua. See submission point below for future details.
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.157	Natural Features and Landscapes	Natural Features and Landscapes	Oppose	Case law and the NZCPS specifically states that mana whenua values are part of the ONL assessment	a. That Council engage with Te Rūnanga o Ngāti Waewae, Te Rūnanga o Makaawhio and Te Runanga o Ngai Tahu to review the proposed ONL and ONF sites against sites of cultural significance which will include the Sites and Areas of Significance to Māori listed in Schedule 3 and the MPZ - Māori Purpose Zoned land to determine if there are ONL and ONF sites that need to be removed to enable the exercising of tino rangatiratanga on our own whenua or if there are Poutini Ngai Tahu values and historical associations that should be recognised and provided for in the Plan. b. That the matters of control or discretion are amended to recognise and protect Poutini Ngai Tahu values.
Westpower Limited (S547)	S547.277	Natural Features and Landscapes	Overview	Amend	Westpower has a considerable network of energy activities that should be recognised.	Add: <b>There is a considerable network of energy activities and infrastructure, including critical infrastructure, on the West Coast that services the communities spread throughout the region and in to neighbouring regions. Such activities have been, and will continue to be, developed and undertaken recognising and taking into account the local conditions. Given the topography and extent of natural features and landscapes on the West Coast practical management solutions are required to ensure maintenance and enhancement of the supply of renewable energy to, and</b>

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<b>between, communities for the benefit of those communities and the wider environment from the use and development of renewable energy. The National Policy Statement for Renewable Electricity Generation also recognises the constraints and requirements of such activities including, amongst other matters, being located where the resource is.</b>
Westpower Limited (S547)	S547.278	Natural Features and Landscapes	Overview	Amend	The format of all "Natural Environment Values" chapters should be consistent.	Format Natural Environment Values chapters consistently to advise how chapters work together to assist with implementation.
Westpower Limited (S547)	S547.279	Natural Features and Landscapes	Overview	Amend	Consistent with the ECO section and should reference Strategic Objectives and Policies.	Consistent with the ECO section, reference the Strategic Objectives and Policies, including amendments arising in this submission above.
Buller Conservation Group (S552)	S552.219	Natural Features and Landscapes	Overview	Amend	The extract is from 4.8.9.3 of the Buller District Plan. It could be included in the ECO overview	<b>Some examples of declining and functionally extinct species (e.g. cobbled skink) need to be highlighted to emphasize that the West Coast is not exempt from such tragedies happening. Wording could be The Cobble Skink, <i>Oligosoma aff. infrapunctatum</i>, found as recently as 2015, predominantly in the Buller, is now functionally extinct. The at risk Shore spurge, <i>Euphorbia glauca</i>, and the nationally endangered Coastal cress, <i>Lepidium flexicule</i>, can be found along the West Coast. Our estuaries are home to the nationally critical dotterel, <i>Charadriidae</i> o. <i>obscurus</i>. It is essential that we protect the habitats of these endangered species.</b>
Frida Inta (S553)	S553.080	Natural Features and Landscapes	Overview	Oppose	RMA, s7(d) and s5(b) these statutory conditions need to be mentioned.	Amend NFL chapter: ' <b>natural character</b> ' in the objectives and policies, and all rules need to refer to protection of it;

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Frida Inta (S553)	S553.215	Natural Features and Landscapes	Overview	Amend		specific mention of mature indigenous trees as these individuals or groups often give an area its natural charm and character.
Frida Inta (S553)	S553.216	Natural Features and Landscapes	Overview	Amend		Mention of ecosystem services. It is at the landscape level that ecosystem services are maintained or, hopefully, enhanced.
Department of Conservation (S602)	S602.084	Natural Features and Landscapes	Overview	Support	The overview provides a clear description of Outstanding Natural Landscapes and Outstanding Natural Features, and the other Plan provisions that apply in these areas.	Support the overview in its entirety.
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.159	Natural Features and Landscapes	Overview	Amend	The values of the ONL/ONF to be protected have not been identified in the Plan. Instead, the front of the chapter refers to how the areas were identified using the landscape reports. These reports do not assess all the values required by case law.	That an additional paragraph is added to the front of this chapter outlining the values that are to be protected through the ONL/ONF provisions.
Westpower Limited (S547)	S547.0507	Natural Features and Landscapes	Overview	Support in part	(1) Whilst the commentary highlights elements of natural features and landscapes on the West Coast it does not highlight the fact that there are communities living and working in, and alongside, these areas and require access to the use and development of natural and physical resources for their wellbeing. Westpower has a considerable network of energy activities within, and between communities on, the West Coast that should be recognised. Whilst it is accepted that there is an "Energy" chapter fragmentation does not	(1) Add a new paragraph to the Overview, <b>"There is a considerable network of energy activities and infrastructure, including critical infrastructure, on the West Coast that services the communities spread throughout the region and in to neighbouring regions. Such activities have been, and will continue to be, developed and undertaken recognising and taking into account the local conditions. Given the topography and extent of natural features and landscapes on the West Coast practical management solutions are required to ensure maintenance and enhancement of the supply of renewable energy to, and between, communities for the benefit of those communities and the wider environment from the use and development of renewable energy. The National Policy Statement for Renewable Electricity</b>

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					assist in considering the range of issues in an integrated manner. (2) The format of all "Natural Environment Values" chapters should be consistent with reference to the ECO chapter. (3) The overview should be consistent with the ECO section and should reference Strategic Objectives and Policies.	<b>Generation also recognises the constraints and requirements of such activities including, amongst other matters, being located where the resource is."</b> (2) Format "natural environment values" chapters consistently to advise how chapters work together to assist with implementation. (3) Consistent with the ECO section, reference the Strategic Objectives and Policies, including amendments arising in this submission above.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.193	Ecosystems and Indigenous Biodiversity	Plantation Forestry	Amend	Explanation of the relationship with the NPS for Plantation Forestry is supported as is the inclusion of more stringent provisions in the Plan for protection of significant biodiversity. Some changes for clarification to this explanation is needed.	Amend: <b>Plantation Forestry</b> Plantation forestry is principally regulated ... stringent to protect <del>s</del> Significant <del>n</del> Natural <del>a</del> Areas and significant indigenous biological diversity within the coastal environment as provided for in the NZCPS Policy 11. Where provisions within this chapter <b>are more stringent, they</b> over-rule the requirements of the NES - PF; an advice note to that effect is included within the <b>relevant</b> Rule."
David Ellerm (S581)	S581.026	Natural Features and Landscapes	Natural Features and Landscapes Objective	Support		Retain
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.338	Natural Features and Landscapes	NFL - O1	Support	We support this objective.	Retain objective.
Manawa Energy Limited (Manawa Energy) (S438)	S438.085	Natural Features and Landscapes	NFL - O1	Support in part	Manawa considers that Objective 1 should be simplified to refer just to protecting the values of outstanding natural landscapes and outstanding natural features. Reference to the maintenance and enhancement of these features is inconsistent with the wording	Amend NFL - O1 as follows: <del>To protect</del> <b>The</b> values of outstanding natural landscape and outstanding natural features on the West Coast/Te Tai o Poutini <b>are protected</b> while providing for <b>from inappropriate</b> subdivision, use and development <del>where the values that make the</del>

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					of Section 6(b) of the Resource Management Act 1991.	<del>landscape or feature outstanding can be maintained or enhanced.</del>
Karen Lippiatt (S439)	S439.029	Natural Features and Landscapes	NFL - O1	Oppose	Remove this Objective. It is self-contradictory. If an area is of significant indigenous vegetation or significant habitat to indigenous fauna, then it's ecosystem and biodiversity value can not be enhanced by turning it into a subdivision.	Delete objective and in particular reference to appropriate subdivision, use and development.
Te Tumu Paeroa - The office of the Māori Trustee (S440)	S440.028	Natural Features and Landscapes	NFL - O1	Support	The Māori Trustee is generally comfortable with the objective in the 'Natural features and landscapes' chapter.	N/A
Waka Kotahi NZ Transport Agency (S450)	S450.090	Natural Features and Landscapes	NFL - O1	Support	The objective is supported by Waka Kotahi as it allows for development to occur within areas of outstanding natural landscape and outstanding natural features if the feature it can be maintained or enhanced.	Retain as proposed.
New Zealand Coal & Carbon Limited (S472)	S472.018	Natural Features and Landscapes	NFL - O1	Support in part		Support providing for "use and development".
Terra Firma Mining Limited (S537)	S537.014	Natural Features and Landscapes	NFL - O1	Support	It is appropriate to protect the values of outstanding natural landscape and outstanding natural features whilst providing for activities where the contributing values can be maintained or enhanced.	Retain NFL - O1
Westpower Limited (S547)	S547.280	Natural Features and Landscapes	NFL - O1	Amend	It appears to be a summary of the two relative RPS objectives.	Delete and replace: <b>1. Protect the region's outstanding natural features and outstanding natural landscapes from inappropriate subdivision, use and development; and 2. Provide for appropriate subdivision, use and development on, in, or adjacent to outstanding natural features and outstanding natural landscapes to enable people and communities to maintain or enhance social, economic and cultural</b>



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						<b>wellbeing.</b>
Department of Conservation (S602)	S602.086	Natural Features and Landscapes	NFL - O1	Amend	Support Objective NFL - O1, and amend to make it more explicit that ONLs and ONFs should be protected from inappropriate subdivision, use and development in accordance with Section 6(b) of the Act, and development in these areas should only be 'allowed' where the values are maintained or enhanced.	Amend: To protect the values of outstanding natural landscapes and outstanding natural features on the West Coast/Te Tai o Poutini <b>from inappropriate subdivision, use and development</b> , while <del>providing for</del> <b>allowing</b> subdivision, use and development where the values that make the landscape or feature outstanding can be maintained or enhanced.
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.160	Natural Features and Landscapes	NFL - O1	Amend	Concerns with the methodology as raised above not including an adequate assessment of the case law criteria for ONL and ONFs.	Retain Objective provided that the values in the Schedules 5 and 6 include an appropriate assessment of mana whenua values.
Buller District Council (S538)	S538.00637	Natural Features and Landscapes	NFL - O1	Support	Council supports the objective and policies for Natural Features and Landscapes as recognising and providing for appropriate activities within ONLFs.	Retain as notified.
Transpower New Zealand Limited (S299)	S299.082	Natural Features and Landscapes	Natural Features and Landscapes Policies	Amend	Transpower supports this note as it provides some clarification as to the relationship to the Energy Chapter, particularly in light of the sought National Grid specific policies within the ENG chapter which adopts a 'seek to avoid' approach for the National Grid. Transpower requests that it is moved into the 'overview' section so that it is more visible to plan users.	Retain this text and move to the 'overview' section.
Manawa Energy Limited (Manawa Energy) (S438)	S438.086	Natural Features and Landscapes	Natural Features and Landscapes Policies	Amend	Manawa requests the inclusion of a new policy that provides for the identification of ONFL, and the criteria or methodology upon which such an identification is based. Manawa considers that this is a crucial step in achieving the requirements of Section 6 (b) of the Resource Management Act 1991, and that the	Add a new policy NFL - P1 as follows: <b>Identify the District's landscapes by:</b> <b>a. assessing the values and characteristics of the landscapes according to the following criteria:</b> <b>i. biophysical (abiotic, biotic); and</b> <b>ii. sensory (legibility, naturalness, vividness, coherence, aesthetic, transient values); and</b>

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					identification of outstanding natural features and development should be undertaken in a transparent manner outlined in the District Plan, with clear identification of the values associated with these features.	<b>iii.associative (shared and recognised values, mana whenua values, historic heritage associations); and b.identifying landscapes, based on their values and characteristics, on the planning maps as Outstanding Natural Features, or Outstanding Natural Landscapes; and c.describing the values and characteristics of each Outstanding Natural Feature, or Outstanding Natural Landscape within Schedules Five and Six.</b> Amend the Plan by consequentially renumbering Plan provisions and making any other necessary to related changes to give effect to the relief sought.
David Ellerm (S581)	S581.027	Natural Features and Landscapes	Natural Features and Landscapes Policies	Support		Retain
Buller District Council (S538)	S538.00638	Natural Features and Landscapes	Natural Features and Landscapes Policies	Support	Council supports the objective and policies for Natural Features and Landscapes as recognising and providing for appropriate activities within ONLFs.	Retain as notified.
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.339	Natural Features and Landscapes	NFL - P1	Support	We strongly support this policy that allows provision of natural hazard mitigation activities and Poutini Ngai Tahu uses for good public health outcomes where they do not adversely affect the values that contribute to a natural feature or landscape being outstanding.	Retain policy.
Manawa Energy Limited (Manawa Energy) (S438)	S438.087	Natural Features and Landscapes	NFL - P1	Support in part	Manawa supports the intent of this policy and the specific recognition of infrastructure within ONFL areas. However, renewable electricity generation facilities are provided for by a number of clauses within this policy which could cause some confusion. Manawa requests that changes to the policy wording is made to clearly provide	Amend NFL - P1 as follows: Provide for activities within outstanding natural landscapes described in Schedule Five and outstanding natural features described in Schedule Six where they do not <b>significantly</b> adversely affect the values that contribute to a natural feature or landscape being outstanding and are for: a. Existing land uses and lawfully established

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					<p>for the operation, maintenance and upgrading of existing electricity generation infrastructure activities, and the establishment of new renewable electricity generation facilities where there is a functional need for it to be located within these areas.</p> <p>Manawa notes that the specific values upon which the identification of outstanding natural features and landscapes has been based are not included within the Plan. It considers that this omission, coupled with the lack of recognition of existing modifications within ONFL, makes it difficult for both Councils and Plan users to implement the provisions of the Plan or to understand how this policy would apply.</p> <p>It is also noted that this policy requires activities to "not adversely affect values", however Policy 2 below requires "avoid significant adverse effects on values". This difference in terminology is confusion and needs to be reconsidered.</p>	<p>activities including existing network utilities, <del>energy</del> <b>renewable electricity generation</b> activities, agricultural, horticultural and pastoral activities;</p> <p>b.Conservation activities;</p> <p>c.Recreational activities;</p> <p>d.Natural hazard mitigation activities;</p> <p>e.Operation, maintenance and upgrade of renewable electricity generation activities.</p> <p>f.Operation, maintenance and upgrading of network infrastructure;</p> <p>g.<del>Upgrading and/or</del> <b>Establishment of</b> new infrastructure and renewable electricity generation activities where there is a functional need for it to be located in these areas;</p> <p>h.Poutini Ngāi Tahu uses; or</p> <p>i.The alteration, maintenance or removal of existing buildings or structures.</p> <p>Insert descriptions of the values of all outstanding natural features and landscapes within Schedules Five and Six to enable impacts on the values to be assessed. Include accurate descriptions of the existing modifications within all outstanding natural features and landscapes within Schedules Five and Six to provide a baseline for assessment.</p>
Te Tumu Paeroa - The office of the Māori Trustee (S440)	S440.029	Natural Features and Landscapes	NFL - P1	Support in part	<p>The Māori Trustee is generally comfortable with the policies in the 'Natural features and landscapes' chapter. The Māori Trustee supports and acknowledges Poutini Ngāi Tahu position as mana whenua of their lands and treaty partner of Te Tai o Poutini.</p> <p>However, the Māori Trustee considers that activities within outstanding natural landscapes and outstanding natural features should also provide for the uses</p>	<p>The Māori Trustee considers that the following amendment needs to be made to policy NFL P1.</p> <p>Amendments P1(h). Poutini Ngāi Tahu <b>and Māori landowner</b> uses;</p>

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					of Māori landowners in conjunction with Poutini Ngāi Tahu.	
KiwiRail Holdings Limited (S442)	S442.054	Natural Features and Landscapes	NFL - P1	Support	KiwiRail supports policy direction that provides for the operation, maintenance, upgrading and installation of new infrastructure within outstanding natural landscapes.	Retain as proposed
Waka Kotahi NZ Transport Agency (S450)	S450.091	Natural Features and Landscapes	NFL - P1	Support	Waka Kotahi supports this policy as it provides for the operation, maintenance and upgrading of network infrastructure within areas of outstanding natural landscapes and outstanding natural features. The policy also provides for the upgrading or new infrastructure in these areas where it has a functional need.	Retain as proposed.
Ministry of Education Te Tāhuhu o Te Mātauranga (S456)	S456.017	Natural Features and Landscapes	NFL - P1	Support	The Ministry supports this policy as it provides for existing land uses and lawfully established activities, which can include educational facilities.	Retain as proposed.
Horticulture New Zealand (S486)	S486.031	Natural Features and Landscapes	NFL - P1	Support	HortNZ supports the recognition of existing horticultural activities.	Retain NFL-P1 a)
Bathurst Resources Limited and BT Mining Limited (S491)	S491.021	Natural Features and Landscapes	NFL - P1	Amend	That existing land uses and lawfully established activities include mining activities.	Amend: Provide for activities within outstanding natural landscapes described in Schedule Five and outstanding natural features described in Schedule Six where they do not adversely affect the values that contribute to a natural feature or landscape being outstanding and are for: a. Existing land uses and lawfully established activities including <b>mineral extraction, mineral exploration, and , anticipated activities in the BCZ and MINZ</b> , existing network utilities, energy activities, agricultural, horticultural, and pastoral activities; b. ...
TiGa Minerals and Metals Limited (S493)	S493.058	Natural Features and Landscapes	NFL - P1	Amend	Should recognised the fixed-in-location nature and functional or operational need.	Amend: a. ...; j. <b>Activities with a functional or operational need to locate</b>

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						<b>within these areas.</b>
Federated Farmers of New Zealand (S524)	S524.069	Natural Features and Landscapes	NFL - P1	Support	Support the recognition of existing farming activities.	Retain as notified
Neil Mouat (S535)	S535.021	Natural Features and Landscapes	NFL - P1	Oppose in part	Residential activities must be provided for.	Amend to include residential activities.
Westpower Limited (S547)	S547.281	Natural Features and Landscapes	NFL - P1	Amend	The policy should seek to allow activities where adverse effects on the values that "together" contribute to a landscape or feature being outstanding are managed.	Amend: Allow <del>Provide for</del> activities within ... where <del>they do not adversely affect the</del> <b>adverse effects on the values</b> -that <b>together</b> contribute to a natural feature or landscape being outstanding are <b>avoided, remedied or mitigated</b> , and are for;
Westpower Limited (S547)	S547.282	Natural Features and Landscapes	NFL - P1	Amend	Amend item "a." to refer to critical infrastructure.	Amend item a. Existing ..., energy activities, <b>critical infrastructure</b> , agricultural, ...:
Westpower Limited (S547)	S547.283	Natural Features and Landscapes	NFL - P1	Amend	Amend item "f." for consistency to refer to energy activities and critical infrastructure.	Amend f. Operation, ...network infrastructure, <b>energy activities and critical infrastructure</b> ;
Westpower Limited (S547)	S547.284	Natural Features and Landscapes	NFL - P1	Amend	Amend item "g." for consistency to refer to energy activities and critical infrastructure.	g. Upgrading ... new <b>energy activities</b> and infrastructure, <b>including critical infrastructure and renewable generation activities</b> , where there is a <b>technical, locational, functional or operational</b> constraint or requirement for it to be located in these areas;
Buller Conservation Group (S552)	S552.081	Natural Features and Landscapes	NFL - P1	Amend	P1 is inconsistent with P2. Significant is not used in P5	Delete P1
Buller Conservation Group (S552)	S552.213	Natural Features and Landscapes	NFL - P1	Amend	para 2 Better language. If compensation is not an option then it either needs to be stated here, or else use our wording.	Insert P2 as P1 to read: P1 Where possible, avoid <del>significant</del> adverse effects on the values that contribute to outstanding natural landscapes described in Schedule Five and outstanding natural features described in Schedule Six. Where <del>significant</del> adverse effects cannot be avoided, ensure that the adverse effects <b>hierarchy is followed</b> .

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						are remedied, mitigated or offset.
Frida Inta (S553)	S553.081	Natural Features and Landscapes	NFL - P1	Amend	P1 works around adversely affecting values, P2 works around significant adverse effects.	Delete P1
Chris & Jan Coll (S558)	S558.108	Natural Features and Landscapes	NFL - P1	Amend	Residential activities must be provided for.	Amend to include residential activities.
Chris J Coll Surveying Limited (S566)	S566.108	Natural Features and Landscapes	NFL - P1	Amend	Residential activities must be provided for.	Amend to include residential activities.
William McLaughlin (S567)	S567.189	Natural Features and Landscapes	NFL - P1	Amend	Residential activities must be provided for.	Amend to include residential activities.
Laura Coll McLaughlin (S574)	S574.108	Natural Features and Landscapes	NFL - P1	Amend	Residential activities must be provided for.	Amend to include residential activities.
WMS Group (HQ) Limited and WMS Land Co. Limited (S599)	S599.063	Natural Features and Landscapes	NFL - P1	Amend	Should recognise the fixed-in-location nature and functional or operational need of activities to sometimes locate within these areas.	Amend NFL - P1 as follows: a. Existing land uses and lawfully established activities including existing network utilities, energy activities, agricultural, horticultural and pastoral activities; b. Conservation activities; c. Recreational activities; d. Natural hazard mitigation activities; e. Operation, maintenance and upgrade of renewable electricity generation facilities; f. Operation, maintenance and upgrading of network infrastructure; g. Upgrading and/or new infrastructure and renewable electricity generation facilities where there is a functional need for it to be located in these areas; h. Poutini Ngāi Tahu uses; or i. The alteration, maintenance or removal of existing buildings or structures; <b>j. Activities with a functional or operational need to locate within these areas.</b>

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Birchfield Coal Mines Ltd (S601)	S601.044	Natural Features and Landscapes	NFL - P1	Amend	Should recognise the fixed-in-location nature and functional or operational need of activities	Amend NFL - P1 as follows: a. ...; or i. The alteration, maintenance or removal of existing buildings or structures; <b>j. Activities with a functional or operational need to locate within these areas, including mineral extraction, exploration and prospecting.</b>
Department of Conservation (S602)	S602.087	Natural Features and Landscapes	NFL - P1	Amend	Support Policy NFL - P1 and amend it to delete the provision for new infrastructure, renewable electricity generation, and hazard mitigation as these activities can adversely affect ONFs and ONLs, and should require a resource consent to be obtained, and existing infrastructure is addressed in a.	Amend:Provide for activities within outstanding natural landscapes described in Schedule Five and outstanding natural features described in Schedule Six where they do not adversely affect the values that contribute to a natural feature or landscape being outstanding and are for: Existing land uses and lawfully established activities including existing network utilities, energy activities, agricultural, horticultural and pastoral activities; Conservation activities; Recreational activities; <del>Natural hazard mitigation activities</del> ; Operation, maintenance and upgrade of renewable electricity generation facilities; Operation, maintenance and upgrading of network infrastructure; <del>Upgrading and/or new infrastructure and renewable electricity generation facilities where there is a functional need for it to be located in these areas</del> ; Poutini Ngāi Tahu uses; or The alteration, maintenance or removal of existing buildings or structures.
Birchfield Ross Mining Limited (S604)	S604.038	Natural Features and Landscapes	NFL - P1	Support	This policy is supported as it seeks to provide for activities to locate within outstanding natural landscapes	Retain
Grey District Council (S608)	S608.060	Natural Features and Landscapes	NFL - P1	Amend	To give effect to Regional Policy Statement (Ch. 7B Policy 4).	Re-word Policy 1 as follows: Provide for activities within outstanding natural landscapes described in Schedule Five and outstanding natural features described in Schedule Six

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<b>which have no more than minor effects....where they do not adversely affect the values that contribute to a natural feature or landscape being outstanding and are for:</b>
Grey District Council (S608)	S608.631	Natural Features and Landscapes	NFL - P1	Support	Support as the policy provides for the operation, maintenance and upgrading of network infrastructure within areas of outstanding natural landscapes and outstanding natural features. The policy also provides for the upgrading or new infrastructure in these areas where it has a functional need.	Retain as proposed.
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.161	Natural Features and Landscapes	NFL - P1	Amend	See submission point on Poutini Ngāi Tahu Activities interpretation.	Amend as follows: Provide for activities within outstanding natural landscapes described in Schedule Five and outstanding natural features described in Schedule Six where they do not adversely affect the values that contribute to a natural feature or landscape being outstanding and are for: ...h. Poutini Ngāi Tahu <b>activities uses</b> ; or ...
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.340	Natural Features and Landscapes	NFL - P2	Support in part	Te Mana Ora recommends that NFL-P2 refer to the effects management hierarchy, as an approach to best protect and manage adverse effects on biodiversity, as used, for example, in the NPS -FM and the Draft NPS-IB. Equally, we suggest that the language of a 'precautionary approach' is included to align with the Draft NPS-IB. Equally, we suggest that the language of a 'precautionary approach' is included to align with the Draft NPS-IB.	Amend NFL-P2 as follows: Where possible, <b>take a precautionary approach</b> to avoid significant adverse effects on the values that contribute to outstanding natural landscapes described in Schedule Five, and outstanding natural features described in Schedule Six. Where significant adverse effects cannot be avoided, ensure that the adverse effects are remedied, mitigated or offset <b>applying the effects management hierarchy</b> .
Manawa Energy Limited (Manawa Energy) (S438)	S438.088	Natural Features and Landscapes	NFL - P2	Support in part	Manawa supports this policy in part, specifically the reference to the identification of specific values of ONFL in Schedules Five and Six of the Plan. However, it is noted that the specific values upon which the identification of	Amend NFL - P2 as follows: Where <del>possible</del> <b>practicable</b> , avoid significant adverse effects on the values that contribute to outstanding natural landscapes described in Schedule Five and outstanding natural features described in Schedule Six. Where significant adverse



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					<p>outstanding natural features and landscapes has been based are not included within the Plan or schedules. Manawa considers that this omission, coupled with the lack of recognition of existing modifications within ONFL, makes it difficult for both Councils and Plan users to implement the provisions of the Plan. This is a significant omission and fundamental to the ability to accurately protect ONFL and to implement the policy approach. Manawa requests that the policy is amended to recognise practicability (as opposed to possibility). It notes that the term 'practicable' is used in other parts of the pTTPP and in the West Coast Regional Policy Statement as well as other higher order documents. All things are possible however many things may not be practicable and it is important that accurate terminology is used. Additionally, Manawa notes that offsetting is not an appropriate method of managing adverse effects on landscape values. The concept of offsetting is based around 'like for like' replacement of something lost with something gained, created or protected. This is particularly used in the biodiversity area and is subject to well established international guidance and application. The ability to remove or impact on landscape values, but then to offset that effect with new landscape values is tenuous and not common practice. Compensation is a valid consideration for impacts on landscape values. There appears to be some confusion</p>	<p>effects cannot <b>practicably</b> be avoided, ensure that <b>such the</b> adverse effects are remedied <b>or</b>, mitigated, or <del>offset</del> <b>compensated if appropriate</b>.</p> <p>Insert descriptions of the values of all outstanding natural features and landscapes within Schedules Five and Six to enable impacts on the values to be assessed. Include accurate descriptions of the existing modifications within all outstanding natural features and landscapes within schedules five and six to provide a baseline for assessment. Review the use of the effects management hierarchy throughout the pTTPP and ensure that it is accurately applied.</p>

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					throughout the pTTPP in the application of the terms offsetting and compensation especially, but also in the use of the effects management hierarchy. This needs to be reviewed throughout the pTTPP and correct referencing used throughout. The effects management hierarchy is now well established through higher order documents but needs to be accurately integrated into the pTTPP. Further, use of the terms offsetting and compensation should relate to residual effects after effects have been avoided, remedied or mitigated. For reference, the effects management hierarchy is well set out in the NPS for Freshwater Management 2020 (in water terms).	
KiwiRail Holdings Limited (S442)	S442.055	Natural Features and Landscapes	NFL - P2	Support	KiwiRail supports policy that recognises that there is existing infrastructure location within outstanding natural landscapes and features, and provides an assessment hierarchy where when significant effects cannot be avoided, adverse effects are remedied, mitigated or offset.	Retain as proposed
Waka Kotahi NZ Transport Agency (S450)	S450.092	Natural Features and Landscapes	NFL - P2	Support	Waka Kotahi supports this policy as it provides for significant adverse effects where they cannot be avoided to be remedied, mitigated, or offset.	Retain as proposed.
New Zealand Coal & Carbon Limited (S472)	S472.019	Natural Features and Landscapes	NFL - P2	Support in part		Support ability to remedy, mitigate or offset effects of activities within ONLs and ONFs.
TiGa Minerals and Metals Limited (S493)	S493.059	Natural Features and Landscapes	NFL - P2	Support	Recognises that sometimes adverse effects are not possible to avoid.	Retain as notified.
Westpower Limited (S547)	S547.285	Natural Features and Landscapes	NFL - P2	Amend	While the general intent of the policy is supported some amendment is required to ensure appropriate	Amend NFL P2: "Where <b>practicable</b> , avoid significant adverse effects on the values that <b>together</b> contribute to ... cannot be avoided, ensure that the adverse effects are remedied,

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					<p>outcomes,</p> <p>(1) Avoidance must be a practical alternative in the circumstances and the policy should reflect that.</p> <p>(2) The policy needs to be worded consistently with RPS provisions regarding effects on the values that together contribute to a landscape or feature being outstanding.</p> <p>(2) Wording in relation to offsetting should relate to proposals and include potential compensation</p>	mitigated including any <b>proposed offsetting or compensation.</b>
Frida Inta (S553)	S553.217	Natural Features and Landscapes	NFL - P2	Amend		<p>Insert P2 as P1 to read:</p> <p>P1 Where possible, avoid <del>significant</del> adverse effects on the values that contribute to outstanding natural landscapes described in Schedule Five and outstanding natural features described in Schedule Six. Where <del>significant</del> adverse effects cannot be avoided, ensure that the adverse effects <b>hierarchy is followed.</b> <del>are remedied, mitigated or offset.</del></p>
Chris & Jan Coll (S558)	S558.110	Natural Features and Landscapes	NFL - P2	Support		Retain
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.230	Natural Features and Landscapes	NFL - P2	Amend	<p>As discussed above in the Key Issues, F&amp;B is not aware of an accepted approach to offsetting landscape effects. As such, it is not clear how the Council will ensure that this is an appropriate method to manage adverse effects in accordance with higher order documents and the Act.</p>	<p>Where possible, avoid <del>significant</del> adverse effects on the values that contribute to outstanding natural landscapes described in Schedule Five and outstanding natural features described in Schedule Six. Where <del>significant</del> adverse effects cannot be avoided, ensure that the adverse effects are remedied, mitigated <del>or offset.</del></p>

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Chris J Coll Surveying Limited (S566)	S566.110	Natural Features and Landscapes	NFL - P2	Support		Retain
William McLaughlin (S567)	S567.190	Natural Features and Landscapes	NFL - P2	Support		Retain
Laura Coll McLaughlin (S574)	S574.110	Natural Features and Landscapes	NFL - P2	Support		Retain
WMS Group (HQ) Limited and WMS Land Co. Limited (S599)	S599.064	Natural Features and Landscapes	NFL - P2	Support	It recognises that sometimes adverse effects are not possible to avoid, but provides for adverse effects to be remedied, mitigated or offset.	Retain as notified
Birchfield Coal Mines Ltd (S601)	S601.045	Natural Features and Landscapes	NFL - P2	Support	Recognises that sometimes adverse effects are not possible to avoid	Retain as notified.
Department of Conservation (S602)	S602.088	Natural Features and Landscapes	NFL - P2	Amend	Support Policy NFL - P2 and amend it so it more explicitly set out the sequence of effects assessment methods in accordance with the effects management hierarchy.	Amend: Where possible, avoid significant adverse effects on the values that contribute to outstanding natural landscapes described in Schedule Five and outstanding natural features described in Schedule Six. Where significant adverse effects cannot be avoided, ensure that the adverse effects are <b>otherwise minimised, remedied or, mitigated, offset or compensated in accordance with the effects management hierarchy.</b>
Birchfield Ross Mining Limited (S604)	S604.039	Natural Features and Landscapes	NFL - P2	Support	Recognises that sometimes adverse effects are not possible to avoid	Retain as notified.
Birchfield Ross Mining Limited (S604)	S604.116	Natural Features and Landscapes	NFL - P2	Amend	Should recognise the fixed-in-location nature and functional or operational need of activities	Amend NFL - P1 as follows: a. ... <del>or</del> i. The alteration, maintenance or removal of existing buildings or structures; <b>j. Activities with a functional or operational need to locate within these areas, including mineral extraction, exploration and prospecting.</b>
Te Mana Ora (Community and Public Health) of the	S190.341	Natural Features and Landscapes	NFL - P3	Support	We support this policy.	Retain policy.

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NPHS/ Te Whatu Ora (S190)						
Manawa Energy Limited (Manawa Energy) (S438)	S438.089	Natural Features and Landscapes	NFL - P3	Support	Manawa supports this policy which recognises existing activities and modification within ONFL.	Retain NFL-P3 as notified.
KiwiRail Holdings Limited (S442)	S442.056	Natural Features and Landscapes	NFL - P3	Support	KiwiRail supports recognition that there is existing infrastructure within outstanding natural features or landscapes.	Retain as proposed
Waka Kotahi NZ Transport Agency (S450)	S450.093	Natural Features and Landscapes	NFL - P3	Support in part	Waka Kotahi generally supports this policy as it recognises there is existing infrastructure and developments within the outstanding natural landscapes or outstanding natural features and provides for new activities and uses. However, the structure of the policy is unclear, so it is recommended that the policy be reworded to provide clarity.	Amend the sentence structure of the policy to provide clarity.
Russell and Joanne Smith (S477)	S477.005	Natural Features and Landscapes	NFL - P3	Support	Recognises that there are settlements, farms and infrastructure located within outstanding natural landscapes or outstanding natural features and provide for new activities and existing uses in these areas where the values that contribute to the outstanding natural landscape or feature are not adversely affected.	Retain as notified
Tim Macfarlane (S482)	S482.005	Natural Features and Landscapes	NFL - P3	Support	Recognises that there are settlements, farms and infrastructure located within outstanding natural landscapes or outstanding natural features and provide for new activities and existing uses in these areas where the values that contribute to the outstanding natural landscape or feature are not adversely affected.	Retain as notified
Horticulture New Zealand (S486)	S486.032	Natural Features and Landscapes	NFL - P3	Support in part	HortNZ supports recognition of 'farms' but seek that it be amended to rural production activities so that it includes all forms of rural production.	Amend NFL-P3 by deleting 'farms' and replacing with 'rural production activities'.

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TiGa Minerals and Metals Limited (S493)	S493.060	Natural Features and Landscapes	NFL - P3	Amend	Should also include minerals extraction, exploration and prospecting.	Amend: Recognise that there are settlements, farms, <b>minerals extraction, exploration and prospecting</b> , and infrastructure located ....
Claire & John West (S506)	S506.005	Natural Features and Landscapes	NFL - P3	Support	Recognises that there are settlements, farms and infrastructure located within outstanding natural landscapes or outstanding natural features and provide for new activities and existing uses in these areas where the values that contribute to the outstanding natural landscape or feature are not adversely affected.	Retain as notified
Federated Farmers of New Zealand (S524)	S524.070	Natural Features and Landscapes	NFL - P3	Support	Support the recognition of farm activities within these landscapes and provision for these and new activities to be provided for.	Retain as notified.
Lauren Nyhan Anthony Phillips (S533)	S533.005	Natural Features and Landscapes	NFL - P3	Support	Recognises that there are settlements, farms and infrastructure located within outstanding natural landscapes or outstanding natural features and provide for new activities and existing uses in these areas where the values that contribute to the outstanding natural landscape or feature are not adversely affected.	Retain as notified
Straterra (S536)	S536.051	Natural Features and Landscapes	NFL - P3	Amend	Need to expand to recognise that there are other uses and activities.	Insert, " <i>land uses</i> " after the word "farms"
Terra Firma Mining Limited (S537)	S537.015	Natural Features and Landscapes	NFL - P3	Support in part	This policy provides for new activities in areas of outstanding natural landscapes or outstanding natural features where the contributing values are not adversely affected. However the term "not adversely affected" is absolute and as read does not allow for any adverse effect, no matter how minor. TFM seeks that this policy is reworded to be more consistent with NFL-O1.	Amend NFL-P3: Recognise that there are settlements, farms and infrastructure located within outstanding natural landscapes or outstanding natural features and provide for new activities and existing uses in these areas where the values that contribute to the outstanding natural landscape or features are <b>maintained or enhanced</b> <del>not adversely affected.</del>

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Westpower Limited (S547)	S547.286	Natural Features and Landscapes	NFL - P3	Amend	Consistency across the plan, provide for energy activities.	Amend: Recognise that there are settlements, farms, <b>energy activities</b> and infrastructure, <b>including critical infrastructure</b> , located within outstanding natural landscapes or outstanding natural features and <b>allow</b> new activities and existing uses in these areas where <b>adverse effects</b> on the values that <b>together</b> contribute to the outstanding natural landscape or feature are <b>avoided, remedied or mitigated</b> .
Chris & Jan Coll (S558)	S558.111	Natural Features and Landscapes	NFL - P3	Support		Retain
Stewart & Catherine Nimmo (S559)	S559.005	Natural Features and Landscapes	NFL - P3	Support	Recognises that there are settlements, farms and infrastructure located within outstanding natural landscapes or outstanding natural features and provide for new activities and existing uses in these areas where the values that contribute to the outstanding natural landscape or feature are not adversely affected.	Retain as notified
Joel and Jennifer Watkins (S565)	S565.007	Natural Features and Landscapes	NFL - P3	Support	Recognises that there are settlements, farms and infrastructure	Retain
Chris J Coll Surveying Limited (S566)	S566.111	Natural Features and Landscapes	NFL - P3	Support		Retain
William McLaughlin (S567)	S567.191	Natural Features and Landscapes	NFL - P3	Support		Retain
Laura Coll McLaughlin (S574)	S574.111	Natural Features and Landscapes	NFL - P3	Support		Retain
Tim and Phaedra Robins (S579)	S579.007	Natural Features and Landscapes	NFL - P3	Support	Recognises that there are settlements, farms and infrastructure located within ONL and ONF	REtain
WMS Group (HQ) Limited and WMS Land Co. Limited (S599)	S599.065	Natural Features and Landscapes	NFL - P3	Amend	Should also include minerals extraction, exploration and prospecting.	Amend NFL P3 as follows: Recognise that there are settlements, farms, <b>minerals extraction, exploration and prospecting</b> , and infrastructure located within outstanding natural landscapes or outstanding

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						natural features and provide for new activities and existing uses in these areas where the values that contribute to the outstanding natural landscape or feature are not adversely affected."
Birchfield Coal Mines Ltd (S601)	S601.046	Natural Features and Landscapes	NFL - P3	Amend	Should also include minerals extraction, exploration and prospecting.	Amend NFL P3 as follows: Recognise that there are settlements, farms, <b>minerals extraction, exploration and prospecting</b> , and infrastructure located within outstanding natural landscapes or outstanding natural features and provide for new activities and existing uses in these areas where the values that contribute to the outstanding natural landscape or feature are not adversely affected.
Department of Conservation (S602)	S602.089	Natural Features and Landscapes	NFL - P3	Amend	Support Policy NFL - P3 and amend it so that development in these areas should only be 'allowed' where the values are not adversely affected.	Amend: Recognise that there are settlements, farms and infrastructure located within outstanding natural landscapes or outstanding natural features and <del>provide for</del> <b>allow</b> new activities and existing uses in these areas where the values that contribute to the outstanding natural landscape or feature are not adversely affected.
Birchfield Ross Mining Limited (S604)	S604.040	Natural Features and Landscapes	NFL - P3	Amend	This policy is supported, however it should also include minerals extraction, exploration and prospecting.	Amend NFL P3 as follows: Recognise that there are settlements, farms, <b>minerals extraction, exploration and prospecting</b> , and infrastructure located within outstanding natural landscapes ...
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.342	Natural Features and Landscapes	NFL - P4	Support	We support this policy.	Retain policy.
Transpower New Zealand Limited (S299)	S299.080	Natural Features and Landscapes	NFL - P4	Oppose in part	In the absence of any certainty as to what is required by the term "minimise' Transpower has concerns as to the	Clarify the term 'minimise' and that the policy does not apply to the National Grid.



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					application of the policy, noting the requirement to 'minimise' applies to any adverse visual effects. Transpower has sought a definition for 'minimise'. Specific to the National Grid, given the technical and operational constraints associated with National Grid infrastructure, its ability to minimise adverse effects by using 'naturally occurring building platforms, materials and colour that blends into the landscape' is severely constrained.	
Manawa Energy Limited (Manawa Energy) (S438)	S438.090	Natural Features and Landscapes	NFL - P4	Support in part	Manawa seeks that Policy 4 is amended to provide some recognition of the operational and functional need of infrastructure and Renewable Electricity Generation activities to locate in these areas, and the practicality of incorporating/utilising the design elements specified in the policy. Further, it opposes the use of subjective terminology such as 'minimise' and 'limiting'.	Amend NFL - P4 as follows: Require that new buildings, structures within outstanding natural features or landscapes <b>minimise manage</b> any adverse visual effects by: a. Ensuring the scale, design and materials of the building and/or structure are appropriate in the location <b>where practicable</b> ; b. Using naturally occurring building platforms, materials and colour that blends into the landscape <b>where practicable</b> ; and c. <del>Limiting</del> <b>Reducing</b> the prominence or visibility of buildings and structures including by integrating it into the outstanding natural feature or landscape.
Waka Kotahi NZ Transport Agency (S450)	S450.094	Natural Features and Landscapes	NFL - P4	Support	Waka Kotahi supports this policy as it allows for new buildings or structures within areas of outstanding natural landscape and outstanding natural features if any adverse visual effects can be minimised.	Retain as proposed.
Westpower Limited (S547)	S547.288	Natural Features and Landscapes	NFL - P4	Amend	The practicalities of each proposal need to be taken into account, including the constraints and requirements of energy activities.	(1) Amend the first paragraph of P4, "Require that new buildings, structures within outstanding natural features or landscapes <b>avoid, remedy or mitigate</b> any adverse visual effects by;" (2) Amend c. Limiting the prominence or visibility of

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						buildings and structures including by, <b>as far as is practicable</b> , integrating it into the outstanding natural feature or landscape. (3) Add new d. <b>Providing for the technical, locational, functional or operational needs of energy activities and infrastructure, including critical infrastructure when implementing items a-c.</b>
Buller Conservation Group (S552)	S552.082	Natural Features and Landscapes	NFL - P4	Amend	This is a protective policy	Insert <b>d Landscaping buildings and structures with appropriate vegetation to soften outlines</b>
Frida Inta (S553)	S553.082	Natural Features and Landscapes	NFL - P4	Amend	To enhance the qualities and characteristics of the NFL.	Insert <b>d Landscaping buildings and structures with appropriate vegetation to soften outlines</b>
Chris & Jan Coll (S558)	S558.112	Natural Features and Landscapes	NFL - P4	Support		Retain
Chris J Coll Surveying Limited (S566)	S566.112	Natural Features and Landscapes	NFL - P4	Support		Retain
William McLaughlin (S567)	S567.192	Natural Features and Landscapes	NFL - P4	Support		Retain
Laura Coll McLaughlin (S574)	S574.112	Natural Features and Landscapes	NFL - P4	Support		Retain
Department of Conservation (S602)	S602.090	Natural Features and Landscapes	NFL - P4	Amend	Support Policy NFL - P4 and amend it to ensure adverse effects are also managed by limiting landform modification through earthworks.	Amend: Require that new buildings, <b>and</b> structures within outstanding natural features or landscapes minimise any adverse visual effects by: Ensuring the scale, design and materials of the building and/or structure are appropriate in the location; Using naturally occurring building platforms, materials and colour that blends into the landscape <b>and limits landform modification through earthworks</b> ; and Limiting the prominence or visibility of buildings and

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						structures including by integrating it into the outstanding natural feature or landscape.
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.343	Natural Features and Landscapes	NFL - P5	Support in part	We recommend stronger, clearer language for NFL-P5 (e), that is consistent with NPS-FM and Draft NPS-IB.	Amend NFL-P5 as follows: Minimise adverse effects on outstanding natural landscapes and outstanding natural features by <b>taking a precautionary approach and</b> considering the following matters: a. The scale of modification to the landscape; ... e. The functional, technical, operational, or locational need of any activity to be sited in the particular location, considering <b>if there is no practicable alternative location or every other practicable alternative location would have adverse effects on the natural environment that is greater than, or equal to the proposed location;</b>
Transpower New Zealand Limited (S299)	S299.081	Natural Features and Landscapes	NFL - P5	Support	Transpower supports the inclusion of functional, technical, operational or locational need as a matter for consideration in this policy. As within other submission points, if the term Minimise is to be retained, a definition is sought.	Retain this policy
Manawa Energy Limited (Manawa Energy) (S438)	S438.091	Natural Features and Landscapes	NFL - P5	Support in part	Manawa supports the specific recognition of the functional, technical and locational needs of activities to be sited in particular locations; national, regional and local benefits of an activity; and the reference to public safety considerations. In accordance with other submission points, Manawa requests that the term 'minimise' is replaced with the term 'manage'.	Retain Clauses e, h and Resource Management Act of NFL - P5 as notified. Amend the first sentence of the policy as follows: <del>Minimise</del> <b>Manage</b> adverse effects on outstanding natural landscapes and outstanding natural features by considering the following matters when assessing proposals for land use or subdivision...
Te Tumu Paeroa - The office of the Māori Trustee (S440)	S440.030	Natural Features and Landscapes	NFL - P5	Support in part	The Māori Trustee supports and acknowledges Poutini Ngāi Tahu position as mana whenua and that they hold a number of historical, spiritual and cultural	The Māori Trustee considers that the following amendment needs to be made to policy NFL P5.

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					<p>associations in Te Tai o Poutini.</p> <p>However, the Māori Trustee considers that NFL P5 needs to expressly address that Māori landowners will likely have their own historical, spiritual and cultural associations with outstanding natural landscapes and outstanding natural features on their whenua. Therefore, when consenting authorities are assessing proposals for land use or subdivision, Māori landowner's historical, spiritual and cultural associations are considered in the assessment.</p>	Amendments P5(f). Any historical, spiritual or cultural association held by Poutini Ngāi Tahu <b>and Māori landowners</b> ;
KiwiRail Holdings Limited (S442)	S442.057	Natural Features and Landscapes	NFL - P5	Support	KiwiRail supports consideration of the functional, technical, operational or locational need of any activity to be sited in the particular location. The rail network is linear and not easily relocated. KiwiRail supports policy direction which identifies the need for rail to be located in certain locations.	Retain as proposed
Waka Kotahi NZ Transport Agency (S450)	S450.095	Natural Features and Landscapes	NFL - P5	Support in part	Waka Kotahi supports the policy, specifically P5.3. as it provides for activities that have a functional or operational need to be in a particular location.	Retain as proposed.
Bathurst Resources Limited and BT Mining Limited (S491)	S491.022	Natural Features and Landscapes	NFL - P5	Amend	The list of considerations needs to consider existing lawfully established activities.	Minimise adverse effects on outstanding natural landscapes and outstanding natural features by considering the following matters when assessing proposals for land use or subdivision: ... <b>k. The extent to which an activity or structure is lawfully established.</b>
TiGa Minerals and Metals Limited (S493)	S493.061	Natural Features and Landscapes	NFL - P5	Amend	To include consideration of short term, in addition to temporary, effects.	Amend NFL P4 as follows: Minimise adverse effects on outstanding natural landscapes and outstanding natural features by considering the following matters when assessing proposals for land use or subdivision: a. ...; d. The

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						temporary, <b>short term</b> or permanent nature of any adverse effects;
Terra Firma Mining Limited (S537)	S537.016	Natural Features and Landscapes	NFL - P5	Support in part	It is helpful that this policy articulates the matters to be considered when assessing proposals for land use or subdivision. However, the intention of the policy, to minimise effects, cannot be achieved by making these considerations as these matters are not quantified.	Amend the first sentence of NFL- P5 to read as follows: <i>When assessing the adverse effects of proposals for land use or subdivision on outstanding natural landscapes and outstanding natural features, take the following matters into account:</i>
Westpower Limited (S547)	S547.289	Natural Features and Landscapes	NFL - P5	Amend	The intent of the policy is to manage activities through a range of requirements.	Amend: <b>Avoid, remedy or mitigate</b> Minimise adverse effects on outstanding natural ... for land use or subdivision: ...
Westpower Limited (S547)	S547.290	Natural Features and Landscapes	NFL - P5	Amend	To reflect policy 3, Chapter 7B of the RPS.	Consider amending items "a.-d." to reflect Policy 3, Chapter 7B, RPS wording.
Westpower Limited (S547)	S547.291	Natural Features and Landscapes	NFL - P5	Amend	Worded consistently with wording elsewhere in submission and plan.	Amend: e. The functional, technical, operational or locational <b>constraints or requirements</b> need-of any activity needing to be sited in the particular location
Westpower Limited (S547)	S547.292	Natural Features and Landscapes	NFL - P5	Amend	Not an exhaustive list and the matters in previous policies.	Consider amending j. to remove items i.-iii.
Buller Conservation Group (S552)	S552.083	Natural Features and Landscapes	NFL - P5	Amend	Positive effects at the local and regional scale must be to enhance the qualities and characteristics of the NFL.	a The scale of modification to the landscape, <b>including any adverse effects on natural character</b> ; h. Any positive effects <b>on identified characteristics and qualities</b> at a regional and local level;
Frida Inta (S553)	S553.083	Natural Features and Landscapes	NFL - P5	Amend	Any positive effects must be to enhance the qualities and characteristics of the NFL.	a The scale of modification to the landscape, <b>including any adverse effects on natural character</b> ; h. Any positive effects <b>on identified characteristics and qualities</b> at a regional and

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						local level;
Chris & Jan Coll (S558)	S558.113	Natural Features and Landscapes	NFL - P5	Support		Retain
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.231	Natural Features and Landscapes	NFL - P5	Amend	A direction to minimise effects is inconsistent with the WCRPS and s6(b) direction to protect ONFLs. It also does not give effect to the objective.	Amend as follows: <b>When determining whether a proposal for land use or subdivision is appropriate, in addition to the above policies, consider the following matters:</b> <del>Minimise adverse effects on outstanding natural landscapes and outstanding natural features by considering the following matters when assessing proposals for land use or subdivision</del>
Joel and Jennifer Watkins (S565)	S565.020	Natural Features and Landscapes	NFL - P5	Amend	The policy does not recognise that there is existing subdivision.	Include as additional text: a. Areexisting lawfully established structures <b>or sites</b> ;
Chris J Coll Surveying Limited (S566)	S566.113	Natural Features and Landscapes	NFL - P5	Support		Retain
William McLaughlin (S567)	S567.193	Natural Features and Landscapes	NFL - P5	Support		Retain
Minerals West Coast (S569)	S569.013	Natural Features and Landscapes	NFL - P5	Amend	Demands careful consideration.	Amend to replace the word "minimise" by the effects management hierarchy
Laura Coll McLaughlin (S574)	S574.113	Natural Features and Landscapes	NFL - P5	Support		Retain
WMS Group (HQ) Limited and WMS Land Co. Limited (S599)	S599.066	Natural Features and Landscapes	NFL - P5	Support	Should be amended to include consideration of short term effects, which are different to temporary or permanent and require consideration	Amend NFL P4 as follows: Minimise adverse effects on outstanding natural landscapes and outstanding natural features by considering the following matters when assessing proposals for land use or subdivision:  a. The scale of modification to the landscape;  b. Whether the proposal is located within a part of the outstanding natural feature or

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						outstanding natural landscape that has capacity to absorb change; c. Whether the proposal can be visually integrated into the landscape and whether it would break the skyline or ridgelines; d. The temporary, <b>short term</b> or permanent nature of any adverse effects;"
Birchfield Coal Mines Ltd (S601)	S601.047	Natural Features and Landscapes	NFL - P5	Amend	Should be amended to include consideration of short term, in addition to temporary, effects.	Amend NFL P5 as follows: Minimise adverse effects on outstanding natural landscapes and outstanding natural features by considering the following matters when assessing proposals for land use or subdivision: a. ... d. The temporary, <b>short term</b> or permanent nature of any adverse effects;
Department of Conservation (S602)	S602.091	Natural Features and Landscapes	NFL - P5	Amend	Support Policy NFL - P5 and amend it to ensure adverse effects are also managed by limiting landform modification through earthworks, are assessed in accordance with the effects management hierarchy, and the assessment considers effects on amenity, recreation, historical and biodiversity values, so that adverse effects can be appropriately managed to protect outstanding natural landscapes and outstanding natural features from inappropriate subdivision, use and development.	Amend: Minimise adverse effects on outstanding natural landscapes and outstanding natural features by considering the following matters when assessing proposals for land use or subdivision: <b>a. Whether an assessment of alternatives has been provided; b. Whether the assessment of effects on outstanding natural landscape and outstanding natural feature values is in accordance with the effects management hierarchy;</b> c. The <b>nature, scale and extent</b> of modification to the landscape <b>or feature;</b> d. ... <b>k. Management of effects on amenity, recreation, historical and biodiversity values; ...</b>
Birchfield Ross Mining Limited (S604)	S604.041	Natural Features and Landscapes	NFL - P5	Amend	Minerals extraction activities often generate relatively short term effects	Amend NFL P5 as follows: Minimise adverse effects on outstanding natural landscapes and outstanding natural features by considering the following matters when assessing proposals for land use or subdivision: a. ... d. The temporary, <b>short term</b> or permanent nature of any adverse

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						effects;
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.162	Natural Features and Landscapes	NFL - P5	Support	support subsection (f) as part of the values of an ONL.	Retain as notified.
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.344	Natural Features and Landscapes	NFL - P6	Support	We support this policy.	Retain policy.
Buller Conservation Group (S552)	S552.084	Natural Features and Landscapes	NFL - P6	Amend		<b>Subject to policies 1 - 5, e</b> Enable the use of Māori Purpose Zoned land in outstanding natural landscapes and on outstanding natural features where land use and subdivision is consistent with tikanga and mātauranga Māori and minimises adverse effects on the outstanding values of the landscape or feature.
Frida Inta (S553)	S553.084	Natural Features and Landscapes	NFL - P6	Amend		<b>Subject to policies 1 - 5, e</b> Enable the use of Māori Purpose Zoned land in outstanding natural landscapes and on outstanding natural features where land use and subdivision is consistent with tikanga and mātauranga Māori and minimises adverse effects on the outstanding values of the landscape or feature.
Chris & Jan Coll (S558)	S558.114	Natural Features and Landscapes	NFL - P6	Support		Retain
Chris J Coll Surveying Limited (S566)	S566.114	Natural Features and Landscapes	NFL - P6	Support		Retain
William McLaughlin (S567)	S567.194	Natural Features and Landscapes	NFL - P6	Support		Retain
Laura Coll McLaughlin (S574)	S574.114	Natural Features and Landscapes	NFL - P6	Support		Retain



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Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.163	Natural Features and Landscapes	NFL - P6	Amend	The overlay should not prevent development of these sites as this does not enable tino rangatiratanga.	Amend as follows: Enable the use of Māori Purpose Zoned land in outstanding natural landscapes and on outstanding natural features <b>by not applying the overlay where</b> land use and subdivision is consistent with tikanga and mātauranga Māori <b>as outlined within an lwi Management Plan</b> and <del>minimises adverse effects on the outstanding values of the landscape or feature.</del> Amend other provisions in the plan to reflect this approach where these or similar overlays apply.
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.345	Natural Features and Landscapes	NFL - P7	Support	We support this policy.	Retain policy.
Te Tumu Paeroa - The office of the Māori Trustee (S440)	S440.031	Natural Features and Landscapes	NFL - P7	Support in part	The Māori Trustee is generally comfortable with NFL P7, with regards to the incorporation of mātauranga Māori principles into the design, development and operations of activities in outstanding natural features and landscapes. The Māori Trustee recognises that Poutini Ngāi Tahu are mana whenua and kaitiaki of their lands in Te Tai o Poutini. However, the Māori Trustee considers that NFL P7 should provide for the ability for Māori landowners to exercise their customary responsibilities, in respect to features and landscapes on their whenua, as they are mana whenua and kaitiaki of their land	The Māori Trustee considers that the following amendment needs to be made to policy NFL P7.  Amendments P7. Consider the incorporation of mātauranga Māori principles into the design, development and/or operation of activities in outstanding natural features and landscapes with cultural, spiritual and/or historic values, interests or associations of importance to Poutini Ngāi Tahu and Māori landowners and opportunities for Poutini Ngāi Tahu and Māori landowners to exercise their customary responsibilities as mana whenua and kaitiaki in respect of the feature or landscape
Buller Conservation Group (S552)	S552.085	Natural Features and Landscapes	NFL - P7	Amend		<b>Subject to policies 1 - 5, e</b> Enable
Frida Inta (S553)	S553.085	Natural Features and Landscapes	NFL - P7	Amend		<b>Subject to policies 1 - 5, e</b> Enable

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Chris & Jan Coll (S558)	S558.115	Natural Features and Landscapes	NFL - P7	Support		Retain
Chris J Coll Surveying Limited (S566)	S566.115	Natural Features and Landscapes	NFL - P7	Support		Retain
William McLaughlin (S567)	S567.195	Natural Features and Landscapes	NFL - P7	Support		Retain
Laura Coll McLaughlin (S574)	S574.115	Natural Features and Landscapes	NFL - P7	Support		Retain
Joel and Jennifer Watkins (S565)	S565.019	Natural Features and Landscapes	Permitted Activities	Amend	The submitter is concerned that this Policy 3 does not flow into the rules.	Amend rules to provide for established existing uses and subdivisions which are intended for residential development, and where residential development is already established.
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.346	Natural Features and Landscapes	NFL - R1	Support	We support this rule.	Retain rule.
Manawa Energy Limited (Manawa Energy) (S438)	S438.092	Natural Features and Landscapes	NFL - R1	Support in part	Manawa generally supports the rule, however considers that clarification is required to ensure that the pTTPP explicitly recognises that earthworks, structures and vegetation clearance for Renewable Electricity Generation activities provided for in the Ecosystems and Biodiversity Chapter (which are also located within an ONFL) are permitted. To ensure consistency with other submission points it is requested that the term 'critical infrastructure' is replaced with 'regionally significant infrastructure'.	Amend NFL - R1 as follows: Maintenance, operation and repair of lawfully established buildings, structures, network utilities, renewable electricity generation activities, fence lines, drains, roads, railway, <del>critical</del> <b>regionally significant</b> infrastructure and tracks within an Outstanding Natural Landscape described in Schedule Five or Outstanding Natural Feature described in Schedule Six. Activity Status Permitted. <b>Where:</b> 1. Earthworks, structures and vegetation clearance applying to renewable electricity generation activities are permitted under the Energy and Ecosystems and Biodiversity chapters.
KiwiRail Holdings Limited (S442)	S442.058	Natural Features and Landscapes	NFL - R1	Support	KiwiRail supports this provision as it allows for maintenance, operation and repair of the railway within an ONL or ONF.	Retain as proposed

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Waka Kotahi NZ Transport Agency (S450)	S450.096	Natural Features and Landscapes	NFL - R1	Support	Waka Kotahi supports the rule as it allows for the maintenance, operation and repair of lawfully established structures, roads, and critical infrastructure within areas of Outstanding Natural Landscapes and Outstanding Natural Features.	Retain as proposed.
Horticulture New Zealand (S486)	S486.033	Natural Features and Landscapes	NFL - R1	Oppose in part	HortNZ is concerned that rural production activities are able to be undertaken in an ONL or ONF. This is dependent on the definition of 'lawfully established'. While the rule provides for a range of activities it does not include rural production activities.	Amend NFL-R1 by adding 'rural production activities' after renewable electricity generation activities'
Federated Farmers of New Zealand (S524)	S524.071	Natural Features and Landscapes	NFL - R1	Support	Support this rule as it recognises and provides for the existing lawfully established activities.	Retain as notified.
Federated Farmers of New Zealand (S524)	S524.072	Natural Features and Landscapes	NFL - R1	Support	Support the recognition of maintaining lawfully established buildings, drains, tracks, roads and fence lines, among other things.	Retain as notified.
Westpower Limited (S547)	S547.293	Natural Features and Landscapes	NFL - R1	Amend	That upgrading should be permitted to achieve and encourage the efficient use.	Amend heading: Maintenance, operation, repair <b>and minor upgrading</b> of ... network utilities, <b>energy activities</b> , renewable electricity ... .
Buller Conservation Group (S552)	S552.086	Natural Features and Landscapes	NFL - R1	Amend	There are too many variables to consider.	amend to state which has priority - ECO/ CE rules, or the values which make the ONF outstanding? There needs to be a ruling around this.
Frida Inta (S553)	S553.086	Natural Features and Landscapes	NFL - R1	Amend	There are too many variables to consider (particularly for new buildings).	Amend to state which has priority - ECO/ CE rules, or the values which make the ONF outstanding? There needs to be a ruling around this.
Chris & Jan Coll (S558)	S558.116	Natural Features and Landscapes	NFL - R1	Amend	We support these rules in principle, but they are very restrictive.	Amend to be more enabling.

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Chris J Coll Surveying Limited (S566)	S566.116	Natural Features and Landscapes	NFL - R1	Amend	We support these rules in principle, but they are very restrictive.	Amend to be more enabling.
William McLaughlin (S567)	S567.196	Natural Features and Landscapes	NFL - R1	Amend	We support these rules in principle, but they are very restrictive.	Amend to be more enabling.
Laura Coll McLaughlin (S574)	S574.116	Natural Features and Landscapes	NFL - R1	Amend	We support these rules in principle, but they are very restrictive.	Amend to be more enabling.
Grey District Council (S608)	S608.602	Natural Features and Landscapes	NFL - R1	Support	Support as written as it allows for the maintenance, operation and repair of lawfully established buildings, structures, network utilities, roads, and critical infrastructure within areas of Outstanding Natural Landscapes and Outstanding Natural Features.	Retain as proposed.
Buller District Council (S538)	S538.00639	Natural Features and Landscapes	NFL - R1	Support	With the exception of Rule 8 discussed below, Council generally supports the rule framework provided the requested amendments to the Ecosystems and Biodiversity Chapter are made to ensure that critical infrastructure, lawfully established activities, hazard mitigation activities etc are provided for. It is expected that there will be a close correlation between ONLFs and SNAs (once identified) therefore the rule framework should provide a consistent approach across the overlays.	Council seeks that a consistent approach is taken with the rule framework for activities within ONLs and SNAs.
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.347	Natural Features and Landscapes	NFL - R2	Support	We support this rule.	Retain rule.
Chris & Jan Coll (S558)	S558.117	Natural Features and Landscapes	NFL - R2	Amend	We support these rules in principle but they are very restrictive.	Amend to be more enabling.
Chris J Coll Surveying Limited (S566)	S566.117	Natural Features and Landscapes	NFL - R2	Amend	We support these rules in principle but they are very restrictive.	Amend to be more enabling.

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William McLaughlin (S567)	S567.197	Natural Features and Landscapes	NFL - R2	Amend	We support these rules in principle but they are very restrictive.	Amend to be more enabling.
Laura Coll McLaughlin (S574)	S574.117	Natural Features and Landscapes	NFL - R2	Amend	We support these rules in principle but they are very restrictive.	Amend to be more enabling.
Buller District Council (S538)	S538.00640	Natural Features and Landscapes	NFL - R2	Support	With the exception of Rule 8 discussed below, Council generally supports the rule framework provided the requested amendments to the Ecosystems and Biodiversity Chapter are made to ensure that critical infrastructure, lawfully established activities, hazard mitigation activities etc are provided for. It is expected that there will be a close correlation between ONLFs and SNAs (once identified) therefore the rule framework should provide a consistent approach across the overlays.	Council seeks that a consistent approach is taken with the rule framework for activities within ONLs and SNAs
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.348	Natural Features and Landscapes	NFL - R3	Support	We support this rule that allows natural hazard mitigation activities in an Outstanding Natural Landscape (Schedule 5) for good public health outcomes and community resilience.	Retain rule.
Manawa Energy Limited (Manawa Energy) (S438)	S438.093	Natural Features and Landscapes	NFL - R3	Support in part	To ensure consistency with other submission points it is requested that the term 'critical infrastructure' is replaced with 'regionally significant infrastructure'.	Amend NFL - R3 as follows: Where: The natural hazard mitigation activities are to protect <del>critical</del> <b>regionally significant</b> infrastructure;
Waka Kotahi NZ Transport Agency (S450)	S450.097	Natural Features and Landscapes	NFL - R3	Support	Waka Kotahi supports this rule as it permits Natural hazard mitigation including earthworks to protect critical infrastructure	Retain as proposed.
West Coast Regional Council (S488)	S488.009	Natural Features and Landscapes	NFL - R3	Amend		Condition 1 of Rule NFL - R3 requires amending as the Council seeks that Rating District protection structures are included in the definition of "critical infrastructure".
West Coast Regional Council (S488)	S488.027	Natural Features and Landscapes	NFL - R3	Amend	Rating District protection structures are primarily intended to protect private land, whose owners pay a separate rate for the	Condition 1 of Rule NFL - R3 requires amending as the Council seeks that Rating District protection structures are included in the

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					protection. However, network utility infrastructure such as roads, railways, and electricity and phone poles and cables within the vicinity of the protection structure can indirectly benefit from this natural hazard protection at no cost.	definition of "critical infrastructure".
Buller Conservation Group (S552)	S552.087	Natural Features and Landscapes	NFL - R3	Amend	The WCRC Land and Water Plan needs to be referred to in an advice note to this rule.	add advice note with reference to tThe WCRC Land and Water Plan
Buller Conservation Group (S552)	S552.088	Natural Features and Landscapes	NFL - R3	Amend	Policies 4 and 5 need to be incorporated into this rule.	<p><b>Require that new buildings, structures within outstanding natural features or landscapes minimise any adverse visual effects by:</b></p> <ol style="list-style-type: none"> <li>1. <b>Ensuring the scale, design and materials of the building and/or structure are appropriate in the location;</b></li> <li>2. <b>Using naturally occurring building platforms, materials and colour that blends into the landscape; and</b></li> <li>3. <b>Limiting the prominence or visibility of buildings and structures including by integrating it into the outstanding natural feature or landscape</b></li> </ol> <p><b>Minimise adverse effects on outstanding natural landscapes and outstanding natural features by considering the following matters when assessing proposals for land use or subdivision:</b></p> <ol style="list-style-type: none"> <li>1. <b>The scale of modification to the landscape;</b></li> <li>2. <b>Whether the proposal is located within a part of the outstanding natural feature or outstanding natural landscape that has capacity to absorb change;</b></li> </ol>

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						<ul style="list-style-type: none"> <li>3. Whether the proposal can be visually integrated into the landscape and whether it would break the skyline or ridgelines;</li> <li>4. The temporary or permanent nature of any adverse effects;</li> <li>5. The functional, technical, operational or locational need of any activity to be sited in the particular location;</li> <li>6. Any historical, spiritual or cultural association held by Poutini Ngāi Tahu;</li> <li>7. Any positive effects the development has on the identified characteristics and qualities;</li> <li>8. Any positive effects at a national, regional and local level;</li> <li>9. Any relevant public safety considerations; and</li> <li>10. The measures proposed to mitigate the effects on the values and characteristics, including:</li> <li>11. The location, design and scale of any buildings or structures, or earthworks;</li> <li>12. The intensity of any activity; and</li> <li>13. The finish of any buildings or structures, including materials, reflectivity and colour; and landscaping and fencing.</li> </ul>
Frida Inta (S553)	S553.087	Natural Features and Landscapes	NFL - R3	Amend	The WCRC Land and Water Plan needs to be referred to in an advice note to this rule.	Add advice note with reference to The WCRC Land and Water Plan
Frida Inta (S553)	S553.088	Natural Features and Landscapes	NFL - R3	Amend	Policies 4 and 5 need to be incorporated into this rule.	<b>Amend to incorporate Policies 4 &amp; 5</b>

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Chris & Jan Coll (S558)	S558.118	Natural Features and Landscapes	NFL - R3	Amend	We support these rules in principle but they are very restrictive.	Amend to be more enabling.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.233	Natural Features and Landscapes	NFL - R3	Oppose	This is not an appropriate activity to be permitted or controlled, given the potentially significant effects on the ONFL.	Delete permitted and controlled activities and require restricted discretionary consent.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.506	Natural Features and Landscapes	NFL - R3	Support	It may be appropriate for emergency hazard mitigation works, with clear parameters around that.	Alternatively limit to emergency hazard mitigation works only and include clear parameters around what is permitted.
Chris J Coll Surveying Limited (S566)	S566.118	Natural Features and Landscapes	NFL - R3	Amend	We support these rules in principle but they are very restrictive.	Amend to be more enabling.
William McLaughlin (S567)	S567.198	Natural Features and Landscapes	NFL - R3	Amend	We support these rules in principle but they are very restrictive.	Amend to be more enabling.
Laura Coll McLaughlin (S574)	S574.118	Natural Features and Landscapes	NFL - R3	Amend	We support these rules in principle but they are very restrictive.	Amend to be more enabling.
Department of Conservation (S602)	S602.092	Natural Features and Landscapes	NFL - R3	Oppose	Amend Rule NFL - R3 as natural hazard mitigation structures, particularly where these are hard protection structures or a larger scale can have more than minor adverse effects on ONLs and ONFs. Hazard mitigation structures should therefore be a restricted discretionary activity so the adverse effect of these can be appropriately assessed through a resource consent application. The type of applicant should have no bearing on whether a resource consent for natural hazard mitigation is appropriate, and this should be removed.	Amend: Activity Status <del>Permitted</del> <b>Restricted Discretionary</b> Where: <del>4. The natural hazard mitigation activities are to protect critical infrastructure; 2. The natural hazard mitigation activities are undertaken by a statutory agency or their nominated contractor;</del> and 3. The work does not involve modification of an Outstanding Natural Feature described in Schedule Six. <b>Discretion is restricted to:</b> <ol style="list-style-type: none"> <li>1. <b>Any requirements for landscape evaluation;</b></li> <li>2. <b>Managing effects on public access and natural character;</b></li> <li>3. <b>Effects on the values that make the feature Outstanding;</b></li> <li>4. <b>Extent and design of earthworks;</b></li> </ol>



Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						5. <b>Effects on historical, cultural, and biodiversity values;</b> 6. <b>Amenity and visual effects;</b> 7. <b>Alternative methods to avoid or mitigate the identified hazard risks and</b> 8. <b>Landscape measures.</b> Advice Notes: ...
Grey District Council (S608)	S608.603	Natural Features and Landscapes	NFL - R3	Support	Support as written as it provides for natural hazard mitigation to protect critical infrastructure.	Retain as proposed.
Buller District Council (S538)	S538.00641	Natural Features and Landscapes	NFL - R3	Support	With the exception of Rule 8 discussed below, Council generally supports the rule framework provided the requested amendments to the Ecosystems and Biodiversity Chapter are made to ensure that critical infrastructure, lawfully established activities, hazard mitigation activities etc are provided for. It is expected that there will be a close correlation between ONLFs and SNAs (once identified) therefore the rule framework should provide a consistent approach across the overlays.	Council seeks that a consistent approach is taken with the rule framework for activities within ONLs and SNAs
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.349	Natural Features and Landscapes	NFL - R4	Support	We support this rule.	Retain rule.
Manawa Energy Limited (Manawa Energy) (S438)	S438.094	Natural Features and Landscapes	NFL - R4	Support	Manawa supports the retention of NFL - R4 in its current form.	Retain NFL - R4 as notified.
Waka Kotahi NZ Transport Agency (S450)	S450.098	Natural Features and Landscapes	NFL - R4	Support	Waka Kotahi supports this rule as it permits the demolition and removal of structures within an outstanding natural landscape described in Schedule five or outstanding natural feature described in Schedule 6.	Retain as proposed.

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Westpower Limited (S547)	S547.294	Natural Features and Landscapes	NFL - R4	Support	Is appropriate in the circumstances	Retain
Chris & Jan Coll (S558)	S558.119	Natural Features and Landscapes	NFL - R4	Amend	We support these rules in principle but they are very restrictive.	Amend to be more enabling.
Chris J Coll Surveying Limited (S566)	S566.119	Natural Features and Landscapes	NFL - R4	Amend	We support these rules in principle but they are very restrictive.	Amend to be more enabling.
William McLaughlin (S567)	S567.199	Natural Features and Landscapes	NFL - R4	Amend	We support these rules in principle but they are very restrictive.	Amend to be more enabling.
Laura Coll McLaughlin (S574)	S574.119	Natural Features and Landscapes	NFL - R4	Amend	We support these rules in principle but they are very restrictive.	Amend to be more enabling.
Buller District Council (S538)	S538.00642	Natural Features and Landscapes	NFL - R4	Support	With the exception of Rule 8 discussed below, Council generally supports the rule framework provided the requested amendments to the Ecosystems and Biodiversity Chapter are made to ensure that critical infrastructure, lawfully established activities, hazard mitigation activities etc are provided for. It is expected that there will be a close correlation between ONLFs and SNAs (once identified) therefore the rule framework should provide a consistent approach across the overlays.	Council seeks that a consistent approach is taken with the rule framework for activities within ONLs and SNAs
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.350	Natural Features and Landscapes	NFL - R5	Support	We support this rule.	Retain rule.
Manawa Energy Limited (Manawa Energy) (S438)	S438.095	Natural Features and Landscapes	NFL - R5	Support in part	A number of assets owned and operated by Manawa are located within areas identified as Outstanding Natural Landscapes and some of these structures and buildings are already of substantial scale. It considers that the maximum height limits for buildings and structures stipulated is impractical, and does not recognise the nature of these	Amend NFL - R5 as follows: Additions or alterations to buildings and structures, <b>and ancillary earthworks and vegetation clearance</b> within an Outstanding Natural Landscape described in Schedule Five or Outstanding Natural Feature described in Schedule Six. Activity Status Permitted 1. The maximum height of <b>new</b> buildings and

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					<p>assets or their existing scale. Manawa seeks the buildings and structures associated with renewable electricity generation activities are exempt from these provisions or at least that the maximum height of the additions or alterations to the existing buildings is amended to allow for some additional height to align with the approach in the ENG and INF chapters.</p> <p>Further, it seeks that ancillary earthworks and vegetation clearance are provided for where incorporated into such activities. It considers that these are critical and related components of works required to undertake additions or alterations to buildings and structures.</p>	<p>structures above ground level is 5m.</p> <p>2. The maximum height of existing buildings and structures greater than 5m in height above ground level does not exceed an additional 30% increase in total height.</p>
Russell and Joanne Smith (S477)	S477.006	Natural Features and Landscapes	NFL - R5	Oppose	The maximum height limit above 5m for buildings and structures does not reflect the topography of the land or its intended purpose as a rural residential subdivision. The limit is unduly prohibitive.	Remove 5m building limit for established subdivisions. Alternatively, provide a more realistic building height limit which considers the sloping topography of the area, and amend relevant definitions as necessary
Tim Macfarlane (S482)	S482.006	Natural Features and Landscapes	NFL - R5	Oppose	The maximum height limit above 5m for buildings and structures does not reflect the topography of the land or its intended purpose as a rural residential subdivision. The limit is unduly prohibitive.	Remove 5m building limit for established subdivisions. Alternatively, provide a more realistic building height limit which considers the sloping topography of the area, and amend relevant definitions as necessary
Claire & John West (S506)	S506.006	Natural Features and Landscapes	NFL - R5	Oppose	The maximum height limit above 5m for buildings and structures does not reflect the topography of the land or its intended purpose as a rural residential subdivision. The limit is unduly prohibitive.	Remove 5m building limit for established subdivisions. Alternatively, provide a more realistic building height limit which considers the sloping topography of the area, and amend relevant definitions as necessary

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Lauren Nyhan Anthony Phillips (S533)	S533.006	Natural Features and Landscapes	NFL - R5	Oppose	The maximum height limit above 5m for buildings and structures does not reflect the topography of the land or its intended purpose as a rural residential subdivision. The limit is unduly prohibitive.	Remove 5m building limit for established subdivisions. Alternatively, provide a more realistic building height limit which considers the sloping topography of the area, and amend relevant definitions as necessary
Westpower Limited (S547)	S547.295	Natural Features and Landscapes	NFL - R5	Amend	Clarification in item "1." is required to link the standard to the rule	Amend 1. the maximum height of any <b>addition or alteration</b> to buildings and ...
Chris & Jan Coll (S558)	S558.121	Natural Features and Landscapes	NFL - R5	Amend	We support these rules in principle but they are very restrictive.	Amend to be more enabling.
Stewart & Catherine Nimmo (S559)	S559.006	Natural Features and Landscapes	NFL - R5	Oppose	The maximum height limit above 5m for buildings and structures does not reflect the topography of the land or its intended purpose as a rural residential subdivision. The limit is unduly prohibitive.	Remove 5m building limit for established subdivisions. Alternatively, provide a more realistic building height limit which considers the sloping topography of the area, and amend relevant definitions as necessary
Joel and Jennifer Watkins (S565)	S565.008	Natural Features and Landscapes	NFL - R5	Amend	The maximum height limit does not reflect the topography.	Remove 5m building limit for established subdivisions.
Joel and Jennifer Watkins (S565)	S565.009	Natural Features and Landscapes	NFL - R5	Amend	The maximum height limit does not reflect the topography.	Alternative relief: provide a more realistic building height limit which considers the sloping topography of the area, and amend relevant definitions as necessary.
Chris J Coll Surveying Limited (S566)	S566.121	Natural Features and Landscapes	NFL - R5	Amend	We support these rules in principle but they are very restrictive.	Amend to be more enabling.
William McLaughlin (S567)	S567.200	Natural Features and Landscapes	NFL - R5	Amend	We support these rules in principle but they are very restrictive.	Amend to be more enabling.
Laura Coll McLaughlin (S574)	S574.121	Natural Features and Landscapes	NFL - R5	Amend	We support these rules in principle but they are very restrictive.	Amend to be more enabling.
Tim and Phaedra Robins (S579)	S579.008	Natural Features and Landscapes	NFL - R5	Amend	The maximum height limit above 5m does not reflect the topography of the land	Amend to remove 5m building limit for established subdivisions.

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Tim and Phaedra Robins (S579)	S579.009	Natural Features and Landscapes	NFL - R5	Amend	The maximum height limit above 5m does not reflect the topography of the land	Alternative relief, provide a more realistic building height limit which considers the sloping topography of the area, and amend relevant definitions as necessary.
Department of Conservation (S602)	S602.093	Natural Features and Landscapes	NFL - R5	Amend	Amend Rule NFL - R5 as additions to ONLs and ONFs should only be a permitted activity where the scale of change is minor and it does not affect the outstanding values of the ONF or ONL. By limiting the permitted size of additions, this enable additions with adverse effects to be appropriately assessed through a resource consent application.	Amend: Activity Status Permitted Where: The maximum height of buildings and structures above ground level is 5m. <b>The maximum size of the addition is no greater than 50m<sup>2</sup>, or 10% of the total floor area, whichever is greater.</b> Advice Note: ...
Buller District Council (S538)	S538.00643	Natural Features and Landscapes	NFL - R5	Support	With the exception of Rule 8 discussed below, Council generally supports the rule framework provided the requested amendments to the Ecosystems and Biodiversity Chapter are made to ensure that critical infrastructure, lawfully established activities, hazard mitigation activities etc are provided for. It is expected that there will be a close correlation between ONLFs and SNAs (once identified) therefore the rule framework should provide a consistent approach across the overlays.	Council seeks that a consistent approach is taken with the rule framework for activities within ONLs and SNAs
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.351	Natural Features and Landscapes	NFL - R6	Support	We support this rule.	Retain rule.
Transpower New Zealand Limited (S299)	S299.083	Natural Features and Landscapes	NFL - R6	Support	Transpower supports this rule as it specifically links to the relevant rules in the Energy Chapter. While most of Transpower's earthworks activities are covered by the NESETA, the clear direction in this rule is useful for any new	Retain this rule

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					construction or other activities that fall outside the scope of the NESETA.	
Manawa Energy Limited (Manawa Energy) (S438)	S438.096	Natural Features and Landscapes	NFL - R6	Support in part	Manawa considers that NFL - R6 as currently written is unclear, and seeks that amendments are made to clarify the applicability of Clause 3) to any activities undertaken in accordance with this rule. Further it requests that the wording of Clause 2b) be amended to refer to Renewable Electricity Generation activities specifically. It is also noted that Renewable Electricity Generation activities are not undertaken by a network utility operator.	Amend NFL - R6 as follows: Activity Status Permitted Where: 1.All performance standards for Earthworks Rule EW - R1 are complied with; and 2.This is ancillary to: a.An infrastructure activity undertaken by a network utility operator in accordance with the Permitted Activity standards in Infrastructure Rule INF - R7; or b.Any <b>renewable electricity generation activity</b> <del>or energy activity undertaken by a network work utility operator</del> in accordance with the Permitted Activity standards in Energy Rule ENG - R14; <del>or</del> 3.For other earthworks ( <b>beyond those provided for in clause 1 and 2 above</b> ), the following standards are complied with: a)The cut height or fill depth does not exceed one metre vertically; b)No more than 500m3 of earthworks are undertaken/12 month period/site; and c)The earthworks are undertaken outside of the Coastal Environment
KiwiRail Holdings Limited (S442)	S442.059	Natural Features and Landscapes	NFL - R6	Support	KiwiRail supports reference to the Infrastructure Chapter within this provision.	Retain as proposed
Waka Kotahi NZ Transport Agency (S450)	S450.099	Natural Features and Landscapes	NFL - R6	Support in part	The intent of the rule appears to facilitate the delivery of infrastructure in areas identified in Schedule 6. However, it references infrastructure activities in accordance with INF-R7 or ENG-R4, neither of which provide for transport infrastructure. It is recommended that the rule provide specifically for allowing earthworks associated with transport	Amend the rule to provide for transport infrastructure or to allow for earthworks undertaken by a statutory agency.

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					infrastructure or an exclusion if the works are undertaken by a statutory agency.	
Russell and Joanne Smith (S477)	S477.007	Natural Features and Landscapes	NFL - R6	Oppose	The cut height is unduly restrictive and not reflective of the topography of NFL's on the West Coast. Particularly in existing subdivisions which are intended for residential subdivision and have existing dwellings.	Remove 1 metre cut height or alternatively provide a more generous cut height which enables residential development as intended in existing subdivisions. Remove reference to Coastal Environment.
Tim Macfarlane (S482)	S482.007	Natural Features and Landscapes	NFL - R6	Oppose	The cut height is unduly restrictive and not reflective of the topography of NFL's on the West Coast. Particularly in existing subdivisions which are intended for residential subdivision and have existing dwellings.	Remove 1 metre cut height or alternatively provide a more generous cut height which enables residential development as intended in existing subdivisions. Remove reference to Coastal Environment.
TiGa Minerals and Metals Limited (S493)	S493.062	Natural Features and Landscapes	NFL - R6	Amend	Other provisions already provide for these activities to be assessed.	Amend: Earthworks, <b>excluding minerals extraction, exploration and prospecting activities</b> , within an Outstanding Natural Landscape described in Schedule Five or Outstanding Natural Feature described in Schedule Six ... Alternatively, amend the definition of earthworks to specifically exclude minerals extraction, exploration and prospecting activities so that these rules do not apply to these activities.
Claire & John West (S506)	S506.007	Natural Features and Landscapes	NFL - R6	Oppose	The cut height is unduly restrictive and not reflective of the topography of NFL's on the West Coast. Particularly in existing subdivisions which are intended for residential subdivision and have existing dwellings.	Remove 1 metre cut height or alternatively provide a more generous cut height which enables residential development as intended in existing subdivisions. Remove reference to Coastal Environment.
Federated Farmers of New Zealand (S524)	S524.073	Natural Features and Landscapes	NFL - R6	Support in part	The coast environment could contain pastoral land so should include a provision for earthworks to be included.	The coast environment could contain pastoral land so should include an allowance for earthworks to be included.
Lauren Nyhan Anthony Phillips (S533)	S533.007	Natural Features and Landscapes	NFL - R6	Oppose	The cut height is unduly restrictive and not reflective of the topography of NFL's on the West Coast. Particularly in existing	Remove 1 metre cut height or alternatively provide a more generous cut height which enables residential development as intended in

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					subdivisions which are intended for residential subdivision and have existing dwellings.	existing subdivisions. Remove reference to Coastal Environment.
Westpower Limited (S547)	S547.296	Natural Features and Landscapes	NFL - R6	Amend	Confirming that the rule does not apply in the circumstance described.	Amend 3. Where activities are located in ... the provisions of the Coastal Environment Chapter apply, <b>and this rule does not apply.</b>
Buller Conservation Group (S552)	S552.089	Natural Features and Landscapes	NFL - R6	Amend	consequential amendment	3. b. /per site <b>or 4ha whichever is the larger.</b>
Frida Inta (S553)	S553.089	Natural Features and Landscapes	NFL - R6	Amend	That's 10 x 50 m x1m depth. This could be the equivalent of a 2 lane road.	3. b. /per site <b>or 4ha whichever is the larger.</b>
Chris & Jan Coll (S558)	S558.122	Natural Features and Landscapes	NFL - R6	Amend	We support these rules in principle but they are very restrictive.	Amend to be more enabling.
Stewart & Catherine Nimmo (S559)	S559.007	Natural Features and Landscapes	NFL - R6	Oppose	The cut height is unduly restrictive and not reflective of the topography of NFL's on the West Coast. Particularly in existing subdivisions which are intended for residential subdivision and have existing dwellings.	Remove 1 metre cut height or alternatively provide a more generous cut height which enables residential development as intended in existing subdivisions. Remove reference to Coastal Environment.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.235	Natural Features and Landscapes	NFL - R6	Amend	This rule needs the reference included in other rules that any vegetation clearance associated with the EW will must comply with ECO chapter provisions.	Amend to include a standard that requires compliance with the ECO provisions for any associated vegetation clearance.
Joel and Jennifer Watkins (S565)	S565.010	Natural Features and Landscapes	NFL - R6	Amend	The cut height is unduly restrictive and not reflective of the topography of NFL's.	Remove 1 metre cut height or alternatively provide a more generous cut height which enables residential development as intended in existing subdivisions.
Joel and Jennifer Watkins (S565)	S565.011	Natural Features and Landscapes	NFL - R6	Support	The cut height is unduly restrictive and not reflective of the topography of NFL's.	Remove reference to Coastal Environment.
Chris J Coll Surveying Limited (S566)	S566.122	Natural Features and Landscapes	NFL - R6	Amend	We support these rules in principle but they are very restrictive.	Amend to be more enabling.
William McLaughlin (S567)	S567.201	Natural Features and Landscapes	NFL - R6	Amend	We support these rules in principle but they are very restrictive.	Amend to be more enabling.



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Laura Coll McLaughlin (S574)	S574.122	Natural Features and Landscapes	NFL - R6	Amend	We support these rules in principle but they are very restrictive.	Amend to be more enabling.
Tim and Phaedra Robins (S579)	S579.010	Natural Features and Landscapes	NFL - R6	Oppose	The cut height is unduly restrictive and not reflective of the topography	Delete 3.a.
Tim and Phaedra Robins (S579)	S579.011	Natural Features and Landscapes	NFL - R6	Amend	The cut height is unduly restrictive and not reflective of the topography	alternative relief, amend to provide a more generous cutheight which enables residential development as intended in existingsubdivisions.
Tim and Phaedra Robins (S579)	S579.012	Natural Features and Landscapes	NFL - R6	Amend	The cut height is unduly restrictive and not reflective of the topography	Remove reference to Coastal Environment.
WMS Group (HQ) Limited and WMS Land Co. Limited (S599)	S599.067	Natural Features and Landscapes	NFL - R6	Amend	Is not considered necessary, because other provisions already adequately provide for these activities to be appropriately assessed	Amend NFL - R6 as follows: Earthworks, <b>excluding minerals extraction, exploration and prospecting activities</b> , within an Outstanding Natural Landscape described in Schedule Five or Outstanding Natural Feature described in Schedule Six ...  Alternatively, amend the definition of earthworks to specifically exclude minerals extraction, exploration and prospecting activities so that these rules do not apply to these activities.
Birchfield Coal Mines Ltd (S601)	S601.048	Natural Features and Landscapes	NFL - R6	Amend	Other provisions already adequately provide for these activities to be appropriately assessed.	Amend NFL - R6 as follows: Earthworks, <b>excluding minerals extraction, exploration and prospecting activities</b> , within an Outstanding Natural Landscape described in Schedule Five or Outstanding Natural Feature described in Schedule Six ... Alternatively, amend the definition of earthworks to specifically exclude minerals extraction, exploration and prospecting activities so that these rules do not apply to these activities.

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Department of Conservation (S602)	S602.094	Natural Features and Landscapes	NFL - R6	Oppose	Amend Rule NFL - R6 as imposing no limits for earthworks on infrastructure providers or network utility operators within ONLs and ONFs can have adverse effects on the outstanding values of those areas.	<p>Amend: Activity Status Permitted Where:</p> <ol style="list-style-type: none"> <li>1. <del>All performance standards for Earthworks Rule EW - R1 are complied with; and</del></li> <li>2. <del>This is ancillary to: a. An infrastructure activity undertaken by a network utility operator in accordance with the Permitted Activity standards in Infrastructure Rule INF - R7; or b. An energy activity undertaken by a network work utility operator in accordance with the Permitted Activity standards in Energy Rule ENG - R4;</del></li> <li>3. <del>For other earthworks, the following standards are complied with:</del> <ol style="list-style-type: none"> <li>a. The cut height or fill depth does not exceed one metre vertically;</li> <li>b. No more than 5200m<sup>3</sup> of earthworks are undertaken/12 month period/site; and</li> <li>c. The earthworks are undertaken outside of the Coastal Environment.</li> </ol> </li> </ol> <p>Advice Note:</p> <ol style="list-style-type: none"> <li>1. <del>Earthworks associated with natural hazard mitigation activities are subject to Rule NFL - R3.</del></li> <li>2. This rule also applies to plantation forestry activities, where this provision is more stringent than the NES - PF.</li> <li>3. Where activities are located in the Coastal Environment, the provisions in the Coastal Environment Chapter apply.</li> </ol> <p>Activity status where compliance not achieved: <del>Controlled</del> <b>Restricted Discretionary ...</b></p>

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Birchfield Ross Mining Limited (S604)	S604.042	Natural Features and Landscapes	NFL - R6	Amend	Other provisions already adequately provide for these activities	Amend NFL - R6 as follows: Earthworks, <b>excluding minerals extraction, exploration and prospecting activities</b> , within ...
Buller District Council (S538)	S538.00644	Natural Features and Landscapes	NFL - R6	Support	With the exception of Rule 8 discussed below, Council generally supports the rule framework provided the requested amendments to the Ecosystems and Biodiversity Chapter are made to ensure that critical infrastructure, lawfully established activities, hazard mitigation activities etc are provided for. It is expected that there will be a close correlation between ONLFs and SNAs (once identified) therefore the rule framework should provide a consistent approach across the overlays.	Council seeks that a consistent approach is taken with the rule framework for activities within ONLs and SNAs
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.352	Natural Features and Landscapes	NFL - R7	Support	We support this rule.	Retain rule.
Buller Conservation Group (S552)	S552.090	Natural Features and Landscapes	NFL - R7	Amend	This rule needs to be subject to rules in ECO and rules and policies in NFL.	<b>3. to be subject to rules in ECO and rules and policies in NFL.</b>
Frida Inta (S553)	S553.090	Natural Features and Landscapes	NFL - R7	Amend	This rule needs to be subject to rules in ECO and rules and policies in NFL.	<b>3. to be subject to rules in ECO and rules and policies in NFL.</b>
Chris & Jan Coll (S558)	S558.123	Natural Features and Landscapes	NFL - R7	Amend	We support these rules in principle but they are very restrictive.	Amend to be more enabling.
Chris J Coll Surveying Limited (S566)	S566.123	Natural Features and Landscapes	NFL - R7	Amend	We support these rules in principle but they are very restrictive.	Amend to be more enabling.
William McLaughlin (S567)	S567.202	Natural Features and Landscapes	NFL - R7	Amend	We support these rules in principle but they are very restrictive.	Amend to be more enabling.
Laura Coll McLaughlin (S574)	S574.123	Natural Features and Landscapes	NFL - R7	Amend	We support these rules in principle but they are very restrictive.	Amend to be more enabling.

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)	S620.164	Natural Features and Landscapes	NFL - R7	Amend	The rule covers both Māori Purpose Activities and Poutini Ngāi Tahu activities however the descriptor only refers to Māori Purpose Activities.	Amend rule as follows : NFL - R7 <b>Poutini Ngai Tahu Activities and</b> Māori Purpose Activities within an Outstanding Natural Landscape described in Schedule Five or Outstanding Natural Feature described in Schedule Six Permitted, where: 1. These are: a. Poutini Ngāi Tahu activities, including cultural harvest of vegetation, mahinga kai, Pounamu, Aotea stone or rock; or b. Māori Purpose Activities in the Māori Purpose Zone undertaken in accordance with an Iwi/Papatipu Rūnanga Management Plan; and
Buller District Council (S538)	S538.00645	Natural Features and Landscapes	NFL - R7	Support	With the exception of Rule 8 discussed below, Council generally supports the rule framework provided the requested amendments to the Ecosystems and Biodiversity Chapter are made to ensure that critical infrastructure, lawfully established activities, hazard mitigation activities etc are provided for. It is expected that there will be a close correlation between ONLFs and SNAs (once identified) therefore the rule framework should provide a consistent approach across the overlays.	Council seeks that a consistent approach is taken with the rule framework for activities within ONLs and SNAs
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.353	Natural Features and Landscapes	NFL - R8	Support	We support this rule.	Retain rule.
Manawa Energy Limited (Manawa Energy) (S438)	S438.097	Natural Features and Landscapes	NFL - R8	Support in part	Manawa is concerned that the Plan as drafted contains inconsistencies in exemptions provided to energy activities, network utility operators and Renewable Electricity Generation providers. It seeks that similar exemptions in this rule provided to network utility operators are also provided to Renewable Electricity	Amend NFL - R8 as follows: Activity Status Permitted Where the structure is: 1.A fence; or 2.Associated with stock water reticulation including tanks, pipes and water troughs; or 3.For parks facilities or parks furniture in any Open Space Zone; or

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					Generation activities. Alignment with other activities is important to provide consistency.	4.For a network utility (including customer connections) in accordance with the Permitted Activity standards for Infrastructure in Rule INF - R7; or 5.For a small-scale renewable electricity generation activity <del>with a maximum height above ground level of 5m</del> <b>where: a.The maximum height is 5m above ground level; and b.The gross floor area of any building does not exceed 100m2; or</b> 6. For agricultural, pastoral and horticultural activities or any accessory building where: a.The maximum height is 3m above ground level; and b.The gross floor area of any building does not exceed 100m2
Russell and Joanne Smith (S477)	S477.008	Natural Features and Landscapes	NFL - R8	Oppose	Residential buildings within an NFL are not included in the list of permitted activities, despite there being rural residential subdivisions located within the NFL. The maximum height limits for buildings is unduly prohibitive, particularly where the majority of the Coasts NFL areas are sloping in nature. The floor limits would also be unduly restrictive for a residential build which the submitter seeks to include.	Remove 3m height limit as it is arbitrary, particularly given the topography of NFL's. Alternatively, provide a more realistic building height limit which considers the sloping topography of the area. Inclusion of residential buildings as a permitted activity, and increase floor area to 250m2 minimum to enable houses.
Tim Macfarlane (S482)	S482.008	Natural Features and Landscapes	NFL - R8	Oppose	Residential buildings within an NFL are not included in the list of permitted activities, despite there being rural residential subdivisions located within the NFL. The maximum height limits for buildings is unduly prohibitive, particularly where the majority of the Coasts NFL areas are sloping in nature. The floor limits would also be unduly restrictive for	Remove 3m height limit as it is arbitrary, particularly given the topography of NFL's. Alternatively, provide a more realistic building height limit which considers the sloping topography of the area. Inclusion of residential buildings as a permitted activity, and increase floor area to 250m2 minimum to enable houses.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					a residential build which the submitter seeks to include.	
Horticulture New Zealand (S486)	S486.034	Natural Features and Landscapes	NFL - R8	Support in part	The permitted activity rule is supported but water reticulation should also apply to irrigation supply, not just stock water.	Amend NFL-R8 2) by deleting 'stock'
Claire & John West (S506)	S506.008	Natural Features and Landscapes	NFL - R8	Oppose	Residential buildings within an NFL are not included in the list of permitted activities, despite there being rural residential subdivisions located within the NFL. The maximum height limits for buildings is unduly prohibitive, particularly where the majority of the Coasts NFL areas are sloping in nature. The floor limits would also be unduly restrictive for a residential build which the submitter seeks to include.	Remove 3m height limit as it is arbitrary, particularly given the topography of NFL's. Alternatively, provide a more realistic building height limit which considers the sloping topography of the area. Inclusion of residential buildings as a permitted activity, and increase floor area to 250m2 minimum to enable houses.
New Zealand Defence Force (S519)	S519.032	Natural Features and Landscapes	NFL - R8	Amend	NZDF seeks to amend Rule NFL - R8 to provide for bridges and / or dams constructed within an Outstanding Natural Landscape described in Schedule Five, as part of TMTA, as a permitted activity.	Amend Rule NFL - R8 to state: Activity Status Permitted Where the structure is: <b>7. A bridge and / or a dam constructed as part of a Temporary Military Training Activity</b>
Federated Farmers of New Zealand (S524)	S524.074	Natural Features and Landscapes	NFL - R8	Support	Retain as notified	Retain as notified
Lauren Nyhan Anthony Phillips (S533)	S533.008	Natural Features and Landscapes	NFL - R8	Oppose	Residential buildings within an NFL are not included in the list of permitted activities, despite there being rural residential subdivisions located within the NFL. The maximum height limits for buildings is unduly prohibitive, particularly where the majority of the Coasts NFL areas are sloping in nature. The floor limits would also be unduly restrictive for a residential build which the submitter seeks to include.	Remove 3m height limit as it is arbitrary, particularly given the topography of NFL's. Alternatively, provide a more realistic building height limit which considers the sloping topography of the area. Inclusion of residential buildings as a permitted activity, and increase floor area to 250m2 minimum to enable houses.
Buller District Council (S538)	S538.219	Natural Features and Landscapes	NFL - R8	Oppose in part	While Clause 6 makes provision for small buildings associated with agricultural activities within ONLFs, there is no	Amend Rule 8 as follows: 6. For <b>residential</b> , agricultural, pastoral and horticultural activities or any accessory building

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					provision for small scale residential buildings to allow for 'bush living' options. Council considers that small scale buildings will not detract from landscape values given the extensive landscapes units covered by the ONLF overlays. It is also considered that the building envelope of 3m height and 100m <sup>2</sup> bulk is too restrictive and more generous standards would be appropriate. The current BDP allows 7m high and 150m <sup>2</sup> buildings within the Paparoa Character Area and Council considers this has achieved appropriate outcomes in this sensitive environment. Rather than 7m height allowance, Council considers that 5m height would be appropriate and consistent with rules for new buildings within Outstanding Natural Coastal Areas (refer CE-R10).	where: The maximum height is <del>3</del> <b>5</b> m above ground level; The gross floor area of any building does not exceed <del>100</del> <b>150</b> m <sup>2</sup> .
Westpower Limited (S547)	S547.297	Natural Features and Landscapes	NFL - R8	Amend	To correct the exclusion of energy activities and rule cross reference to energy activities.	4. For a network ... (including <b>energy activities</b> and customer connections) in accordance with ... Infrastructure in rule INF-R7 <b>and Energy Activities in Rule ENG-R4</b> ; or
Buller Conservation Group (S552)	S552.091	Natural Features and Landscapes	NFL - R8	Amend	Parks furniture and facilities - needs to be minimal with low visual impact	3. For parks facilities or parks furniture in any Open Space Zone <b>needs to be minimal with low visual impact</b> <b>Cross-reference with WCRC Land and Water Plan.</b>
Frida Inta (S553)	S553.091	Natural Features and Landscapes	NFL - R8	Amend	Parks furniture and facilities - needs to be minimal with low visual impact	3. For parks facilities or parks furniture in any Open Space Zone <b>needs to be minimal with low visual impact</b> <b>Cross-reference with WCRC Land and Water Plan.</b>
Chris & Jan Coll (S558)	S558.124	Natural Features and Landscapes	NFL - R8	Amend	Dwellings and ancillary buildings should be provided for in this rule.	Amend rule to include residential dwellings and ancillary buildings at appropriate scale.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Stewart & Catherine Nimmo (S559)	S559.008	Natural Features and Landscapes	NFL - R8	Oppose	Residential buildings within an NFL are not included in the list of permitted activities, despite there being rural residential subdivisions located within the NFL. The maximum height limits for buildings is unduly prohibitive, particularly where the majority of the Coasts NFL areas are sloping in nature. The floor limits would also be unduly restrictive for a residential build which the submitter seeks to include.	Remove 3m height limit as it is arbitrary, particularly given the topography of NFL's. Alternatively, provide a more realistic building height limit which considers the sloping topography of the area. Inclusion of residential buildings as a permitted activity, and increase floor area to 250m2 minimum to enable houses.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.236	Natural Features and Landscapes	NFL - R8	Amend	This rule needs the reference included in other rules that any vegetation clearance associated with the EW will must comply with ECO chapter provisions.	Amend to include a standard that requires compliance with the ECO provisions for any associated vegetation clearance.
Joel and Jennifer Watkins (S565)	S565.013	Natural Features and Landscapes	NFL - R8	Amend	The maximum height limits for buildings is unduly prohibitive.	Remove 3m height limit as it is arbitrary, particularly given the topography of NFL's.
Joel and Jennifer Watkins (S565)	S565.014	Natural Features and Landscapes	NFL - R8	Amend	The maximum height limits for buildings is unduly prohibitive.	Alternative relief: provide a more realistic building height limit which considers the sloping topography of the area.
Joel and Jennifer Watkins (S565)	S565.015	Natural Features and Landscapes	NFL - R8	Amend	The floor limits would also be unduly restrictive.	Inclusion of residential buildings as a permitted activity, and increase floor area to 250m2 minimum to enable houses.
Chris J Coll Surveying Limited (S566)	S566.124	Natural Features and Landscapes	NFL - R8	Amend	Dwellings and ancillary buildings should be provided for in this rule.	Amend rule to include residential dwellings and ancillary buildings at appropriate scale.
William McLaughlin (S567)	S567.203	Natural Features and Landscapes	NFL - R8	Amend	Dwellings and ancillary buildings should be provided for in this rule.	Amend rule to include residential dwellings and ancillary buildings at appropriate scale.
Laura Coll McLaughlin (S574)	S574.124	Natural Features and Landscapes	NFL - R8	Amend	Dwellings and ancillary buildings should be provided for in this rule.	Amend rule to include residential dwellings and ancillary buildings at appropriate scale.
Tim and Phaedra Robins (S579)	S579.013	Natural Features and Landscapes	NFL - R8	Amend	Residential buildings are not included in the list of permitted activities	Amend 6.a. to remove 3m height limit as it is arbitrary, particularly given the topography of NFL's.



Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Tim and Phaedra Robins (S579)	S579.014	Natural Features and Landscapes	NFL - R8	Amend	Residential buildings are not included in the list of permitted activities	Alternative relief, provide a more realistic building height limit which considers the sloping topography of the area.
Tim and Phaedra Robins (S579)	S579.015	Natural Features and Landscapes	NFL - R8	Support	there are rural residential subdivisions located within the NFL	Amend to include ofresidential buildings as a permitted activity, and increase floor area to 250m2 minimum to enable houses.
Department of Conservation (S602)	S602.095	Natural Features and Landscapes	NFL - R8	Amend	Amend Rule NFL - R8 as a consequence to the changes sought in the submission above.	Amend:Activity Status Permitted Where the structure is: <ul style="list-style-type: none"> <li>1. A fence; or</li> <li>2. Associated with stock water reticulation including tanks, pipes and water troughs; or</li> <li>3. For parks facilities or parks furniture in any Open Space Zone; or</li> <li>4. <del>For a network utility (including customer connections) in accordance with the Permitted Activity standards for Infrastructure in Rule INF - R7; or...</del></li> </ul>
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.165	Natural Features and Landscapes	NFL - R8	Amend	Mahinga kai is a critical aspect of Poutini Ngāi Tahu values and erection of buildings and structures associated with mahinga kai should be a permitted activity.	Include the following: <b>7. Associated with mahinga kai</b>
William McLaughlin (S567)	S567.204	Natural Features and Landscapes	Controlled Activities	Support		Retain
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.169	Natural Features and Landscapes	Controlled Activities	Amend	The matters of control when assessing the impact of an activity on an ONL/ONF needs to include the associational values (including Tangata Whenua values)	Include the following: Discretion is restricted to: <b>f. Identifying and avoiding impacts on Poutini Ngāi Tahu values</b>
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.354	Natural Features and Landscapes	NFL - R9	Support	We support this rule that controls natural hazard mitigation activities in an Outstanding Natural Landscape (Schedule 6) for good public health outcomes and community resilience.	Retain rule.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Manawa Energy Limited (Manawa Energy) (S438)	S438.098	Natural Features and Landscapes	NFL - R9	Support in part	Manawa generally support the provisions of R9, however consider that these provisions should be extended to also apply to temporary energy activities required to be undertaken within outstanding natural features and landscapes. These activities are permitted by virtue of Rule ENG - R5, and would ensure continuity of such provisions across various Overlay layers. To ensure consistency with other submission points it is requested that the term 'critical infrastructure' is replaced with 'regionally significant infrastructure'.	Amend NFL - R9 as follows: Activity Status Controlled Where: 1. These are Temporary <del>Energy</del> <b>Electricity Generation</b> Activities undertaken in accordance with ENG - R9, or 2. These are <b>required</b> to protect <del>Critical</del> <b>Regionally Significant</b> Infrastructure; and 3. These will not destroy any Outstanding Natural Feature identified in Schedule Six or the values which make it Outstanding.
Westpower Limited (S547)	S547.298	Natural Features and Landscapes	NFL - R9	Amend	Reference to energy activities in item 1. Consistent with the layout of the plan.	Amend 1. These are to protect Critical Infrastructure, <b>including Energy Activities.</b>
Westpower Limited (S547)	S547.299	Natural Features and Landscapes	NFL - R9	Amend	To be consistent with the RPS wording regarding effects on values.	Amend 2. These will not ... the values which <b>together</b> make it Outstanding.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.234	Natural Features and Landscapes	NFL - R9	Oppose	This is not an appropriate activity to be permitted or controlled, given the potentially significant effects on the ONFL.	Delete permitted and controlled activities and require restricted discretionary consent.
Department of Conservation (S602)	S602.096	Natural Features and Landscapes	NFL - R9	Oppose	Oppose Rule NFL - R9 for the same reasons provided in DOCs submission to NFL - R3 above.	Delete Rule NFL - R9 in its entirety.
Grey District Council (S608)	S608.061	Natural Features and Landscapes	NFL - R9	Amend	Landowners should have the right to protect their own land from natural hazards.	Amend Rule to remove Condition 1
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.166	Natural Features and Landscapes	NFL - R9	Amend	The matters of control when assessing the impact of an activity on an ONL/ONF needs to include the associated values (including Tangata Whenua values)	Include the following: Matters of control are: <b>f. Identifying and avoiding impacts on Poutini Ngāi Tahu values</b>
Buller District Council (S538)	S538.00646	Natural Features and Landscapes	NFL - R9	Support	With the exception of Rule 8 discussed below, Council generally supports the rule framework provided the requested	Council seeks that a consistent approach is taken with the rule framework for activities

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					amendments to the Ecosystems and Biodiversity Chapter are made to ensure that critical infrastructure, lawfully established activities, hazard mitigation activities etc are provided for. It is expected that there will be a close correlation between ONLFs and SNAs (once identified) therefore the rule framework should provide a consistent approach across the overlays.	within ONLs and SNAs
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.355	Natural Features and Landscapes	NFL - R10	Support	We support this rule that controls earthworks for natural hazard mitigation activities in an Outstanding Natural Landscape (Schedule 6) for good public health outcomes and community resilience.	Retain rule.
Manawa Energy Limited (Manawa Energy) (S438)	S438.099	Natural Features and Landscapes	NFL - R10	Support in part	<p>Manawa considers that consistent terminology should be used throughout the pTTPP, and that this rule should be widened in scope to provide for installation, development, operation and maintenance of Renewable Electricity Generation facilities, and associated activities and infrastructure (consistent with the provisions of the NPS - REG 2011).</p> <p>Manawa also opposes the activity status afforded to those activities which do not comply with the rule. It considers that such activities should be afforded restricted discretionary activity status. Such status is consistent to that afforded to other similar activities which do not comply with specific rules.</p> <p>To ensure consistency with other submission points it is requested that the term 'critical infrastructure' is replaced with 'regionally significant infrastructure'.</p>	<p>Amend NFL - R10 as follows: Activity Status Controlled Where:</p> <ol style="list-style-type: none"> <li>1. These are for: <ol style="list-style-type: none"> <li>a) Walking/cycling tracks;</li> <li>b) Roads, farm tracks or fences;</li> <li>c) Installation of network utility infrastructure; or</li> <li>d) Installation, <b>upgrade, operation, repair and maintenance</b> of a renewable electricity generation <b>activity-facility</b>; or</li> <li>e) Establishment of a building platform and access to a building site in an approved subdivision or for a residential building where there is no existing residential building on the property;</li> <li>f) Protection of <del>critical</del> <b>regionally significant</b> infrastructure from natural hazards; and</li> </ol> </li> <li>2. Earthworks are the minimum required to undertake the activity.</li> </ol> <p>Discretion is restricted to:</p> <ol style="list-style-type: none"> <li>a) Any requirements for landscape evaluation;</li> <li>b) Managing effects on public access and natural</li> </ol>

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						character; c.Effects on the values that make the feature Outstanding; d.Extent and design of earthworks; and e.Any physical measures required to mitigate the effects on values that make the feature or area outstanding- <del>Landscape measures.</del> Activity Status where compliance not achieved: Restricted Discretionary.
Waka Kotahi NZ Transport Agency (S450)	S450.100	Natural Features and Landscapes	NFL - R10	Support in part	Waka Kotahi supports this rule as a controlled activity, which provides for earthworks associated with roads and the protection of critical infrastructure from natural hazards. However, R10.2 states that earthworks are the minimum required to undertake the activity. There is concern how the term 'minimum' is implemented and how it is quantified. It is recommended that the term minimum be replaced by a quantifiable measure to improve clarity.	Amend the rule to replace 'minimum' with a quantifiable measure.
Russell and Joanne Smith (S477)	S477.009	Natural Features and Landscapes	NFL - R10	Oppose	Controlled activity standard 2. Is ambiguous and uncertain	Delete controlled activity standard 2.
Tim Macfarlane (S482)	S482.009	Natural Features and Landscapes	NFL - R10	Oppose	Controlled activity standard 2. Is ambiguous and uncertain	Delete controlled activity standard 2.
Bathurst Resources Limited and BT Mining Limited (S491)	S491.023	Natural Features and Landscapes	NFL - R10	Amend	to consider existing functional or operation need, lawfully established activities, and activities within the MINZ and BCZ zones.	Amend Where: 1. These are for: <b>a. Earthworks within the MINZ or BCZ; or b. There is a functional or operational need for the activity to occur at this location; or c. ...</b>
Claire & John West (S506)	S506.009	Natural Features and Landscapes	NFL - R10	Oppose	Controlled activity standard 2. Is ambiguous and uncertain	Delete controlled activity standard 2.
Lauren Nyhan Anthony Phillips (S533)	S533.009	Natural Features and Landscapes	NFL - R10	Oppose	Controlled activity standard 2. Is ambiguous and uncertain	Delete controlled activity standard 2.
Westpower Limited (S547)	S547.300	Natural Features and Landscapes	NFL - R10	Amend	The intent of the rule is supported with amendments for,	(1) Amend item c., "c. Installation of ... infrastructure, <b>including energy activities.</b> "

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					<p>(1) Consistency of wording throughout the plan in terms of items "c." and "d."</p> <p>(2) Terminology regarding "control matters" requires amendment for consistency with NFL-R9 and the intent of the rule.</p> <p>(3) Advice note 1 requires clarification of rule applicability in the circumstances described.</p>	<p>(2) Amend item d., "Installation of a ... generation <b>activity</b>; or".</p> <p>(3) Remove "Discretion is restricted to:" and replace with "<b>Matters of control are:</b>".</p> <p>(4) Amend advice note 1., "1. For earthworks ... Environment Rules, and <b>this rule does not apply.</b>"</p>
Stewart & Catherine Nimmo (S559)	S559.009	Natural Features and Landscapes	NFL - R10	Oppose	Controlled activity standard 2. Is ambiguous and uncertain	Delete controlled activity standard 2.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.237	Natural Features and Landscapes	NFL - R10	Amend	This rule needs the reference included in other rules that any vegetation clearance associated with the EW will must comply with ECO chapter provisions.	Amend to include a standard that requires compliance with the ECO provisions for any associated vegetation clearance.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.507	Natural Features and Landscapes	NFL - R10	Support	Many of these activities may not be appropriate in an ONFL, and as such, the Council should retain the ability to decline consent.	Amend to make restricted discretionary.
Joel and Jennifer Watkins (S565)	S565.016	Natural Features and Landscapes	NFL - R10	Amend	Controlled activity standard 2. Is ambiguous and uncertain	Delete controlled activity standard 2.
Tim and Phaedra Robins (S579)	S579.016	Natural Features and Landscapes	NFL - R10	Oppose	Is ambiguous and uncertain	Delete controlled activity standard 2.
Department of Conservation (S602)	S602.097	Natural Features and Landscapes	NFL - R10	Oppose	Oppose Rule NFL - R10 and amend it so that resource consent is required for a restricted discretionary activity, as earthworks that are not sensitively designed and located can have more than minor adverse effects on ONL and ONF values, and should therefore not be subject to a rule where the application must be granted.	Amend: Activity Status <del>Controlled</del> <b>Restricted Discretionary</b> Where: 1. These are for: a. Walking/cycling tracks; b. Roads, farm tracks or fences; c. Installation of network utility infrastructure; or d. Installation of a renewable electricity generation facility; or e, Establishment of a building platform and access to a building site in an approved

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<p>subdivision or for a residential building where there is no existing residential building on the property; <b>and</b>  f. Protection of critical infrastructure from natural hazards; <del>and 2. Earthworks are the minimum required to undertake the activity...</del> <b>Discretion is restricted to:</b></p> <ol style="list-style-type: none"> <li>1. <b>Any requirements for landscape evaluation;</b></li> <li>2. <b>Managing effects on public access and natural character;</b></li> <li>3. <b>Effects on the values that make the feature Outstanding;</b></li> <li>4. <b>Extent and design of earthworks;</b></li> <li>5. <b>Effects on historical, cultural, and biodiversity values;</b></li> <li>6. <b>Amenity and visual effects; and</b></li> <li>7. <b>Landscape measures.</b></li> </ol> <p>Activity status where compliance not achieved: Discretionary</p>
Grey District Council (S608)	S608.604	Natural Features and Landscapes	NFL - R10	Support in part	The intention of this rule is supported. Concern lies with the use of the word 'minimum' and how it is implemented and is quantifiable.	Amend the rule to replace 'minimum' with a quantifiable measure.
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.167	Natural Features and Landscapes	NFL - R10	Amend	The matters of control when assessing the impact of an activity on an ONL/ONF needs to include the associated values (including Tangata Whenua values)	Include the following: Matters of control are:f. <b>Identifying and avoiding impacts on Poutini Ngāi Tahu values</b>
Buller District Council (S538)	S538.00647	Natural Features and Landscapes	NFL - R10	Support	With the exception of Rule 8 discussed below, Council generally supports the rule framework provided the requested amendments to the Ecosystems and Biodiversity Chapter are made to ensure that critical infrastructure, lawfully established activities, hazard mitigation activities etc are provided for. It is expected that there will be a close	Council seeks that a consistent approach is taken with the rule framework for activities within ONLs and SNAs

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					correlation between ONLFs and SNAs (once identified) therefore the rule framework should provide a consistent approach across the overlays.	
William McLaughlin (S567)	S567.205	Natural Features and Landscapes	Restricted Discretionary Activities	Support		Retain
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.356	Natural Features and Landscapes	NFL - R11	Support	We support this rule.	Retain rule.
Russell and Joanne Smith (S477)	S477.016	Natural Features and Landscapes	NFL - R11	Oppose	Earthworks are not enabled in an area that has been approved for subdivision and which has a number of dwellings which are established.	Include access and building platforms as a permitted activity.
Tim Macfarlane (S482)	S482.016	Natural Features and Landscapes	NFL - R11	Oppose	Earthworks are not enabled in an area that has been approved for subdivision and which has a number of dwellings which are established.	Include access and building platforms as a permitted activity.
Claire & John West (S506)	S506.016	Natural Features and Landscapes	NFL - R11	Oppose	Earthworks are not enabled in an area that has been approved for subdivision and which has a number of dwellings which are established.	Include access and building platforms as a permitted activity.
Lauren Nyhan Anthony Phillips (S533)	S533.016	Natural Features and Landscapes	NFL - R11	Oppose	Earthworks are not enabled in an area that has been approved for subdivision and which has a number of dwellings which are established.	Include access and building platforms as a permitted activity.
Stewart & Catherine Nimmo (S559)	S559.016	Natural Features and Landscapes	NFL - R11	Oppose	Earthworks are not enabled in an area that has been approved for subdivision and which has a number of dwellings which are established.	Include access and building platforms as a permitted activity.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.238	Natural Features and Landscapes	NFL - R11	Oppose in part	This rule needs the reference included in other rules that any vegetation clearance associated with the EW will must comply with ECO chapter provisions.	Amend to include a standard that requires compliance with the ECO provisions for any associated vegetation clearance.
Te Runanga o Ngai Tahu, Te Runanga	S620.168	Natural Features and Landscapes	NFL - R11	Amend	If NFL -R7 is not complied with then it becomes a RDA under this rule.	Amend the rule as follows: NFL - R11 <b>Poutini Ngāi Tahu Activities</b> , Māori Purpose activities

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
o Ngati Waewae, Te Runanga o Makaawhio (S620)					However, there is no reference to Poutini Ngāi Tahu Activities within the rule as within NFL -R7.	within ....
Buller District Council (S538)	S538.00648	Natural Features and Landscapes	NFL - R11	Support	With the exception of Rule 8 discussed below, Council generally supports the rule framework provided the requested amendments to the Ecosystems and Biodiversity Chapter are made to ensure that critical infrastructure, lawfully established activities, hazard mitigation activities etc are provided for. It is expected that there will be a close correlation between ONLFs and SNAs (once identified) therefore the rule framework should provide a consistent approach across the overlays.	Council seeks that a consistent approach is taken with the rule framework for activities within ONLs and SNAs
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.357	Natural Features and Landscapes	NFL - R12	Support	We support this rule.	Retain rule.
Manawa Energy Limited (Manawa Energy) (S438)	S438.100	Natural Features and Landscapes	NFL - R12	Support in part	Manawa generally support the intent of NFL - R12, however consider that the stated matters over which discretion is restricted are overlapping, and do not recognise matters such as functional and optional needs of Renewable Electricity Generation nor public safety considerations. It seeks amendments to these matters of discretion to this effect. A consequential amendment is also required to the rule to address matters raised in the Manawa submission on NFL - R10.	Amend NFL - R12 as follows: Buildings or Structures and associated Earthworks within an Outstanding Natural Landscape described in Schedule Five or Outstanding Natural Feature described in Schedule Six not meeting Permitted Activity rules <b>or NFL - R10</b> . Discretion is restricted to: a. Any requirements for landscape evaluation; b. Managing effects on public access and natural character; c. Effects on the values that make the feature Outstanding; d. Extent and design of earthworks; and e. <del>Landscape measures</del> Any physical measures required to mitigate the effects on values that make the feature or area outstanding; f. Any functional or operational needs that relate



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						to the proposal and its location; g.Any matters of public safety.
Westpower Limited (S547)	S547.303	Natural Features and Landscapes	NFL - R12	Amend	A minor amendment to "3.a." for consistent terminology across the plan.	Amend 3.a. <b>Energy activities and infrastructure, including critical infrastructure.</b>
Westpower Limited (S547)	S547.304	Natural Features and Landscapes	NFL - R12	Amend	And additional "discretion" matter "f." regarding constraints and requirements of energy activities and infrastructure.	Add f. <b>The technical, locational, functional or operational constraints or requirements of energy activities and infrastructure, including critical infrastructure and renewable energy generation activities.</b>
Westpower Limited (S547)	S547.305	Natural Features and Landscapes	NFL - R12	Amend	An additional "discretion" matter "g." regarding the benefits arising from activities.	<b>g. The benefits arising from the proposed activity.</b>
Buller Conservation Group (S552)	S552.092	Natural Features and Landscapes	NFL - R12	Amend	R12 Should be discretionary, not restricted discretionary.	Make rule discretionary, not restricted discretionary.
Frida Inta (S553)	S553.092	Natural Features and Landscapes	NFL - R12	Amend	R12 Should be discretionary, not restricted discretionary.	Make rule discretionary, not restricted discretionary.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.239	Natural Features and Landscapes	NFL - R12	Amend	This rule needs the reference included in other rules that any vegetation clearance associated with the EW will must comply with ECO chapter provisions.	Amend to include a standard that requires compliance with the ECO provisions for any associated vegetation clearance.
Buller District Council (S538)	S538.00649	Natural Features and Landscapes	NFL - R12	Support	With the exception of Rule 8 discussed below, Council generally supports the rule framework provided the requested amendments to the Ecosystems and Biodiversity Chapter are made to ensure that critical infrastructure, lawfully established activities, hazard mitigation activities etc are provided for. It is expected that there will be a close correlation between ONLFs and SNAs (once identified) therefore the rule	Council seeks that a consistent approach is taken with the rule framework for activities within ONLs and SNAs

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					framework should provide a consistent approach across the overlays.	
William McLaughlin (S567)	S567.206	Natural Features and Landscapes	Discretionary Activities	Support		Retain
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.170	Natural Features and Landscapes	Discretionary Activities	Amend	If an activity is unable to comply with NFL- R11 then it is a discretionary activity. There are three discretionary activities within the notified plan but none relate to the activities managed by NFLR7 and NFL- R11.	Include the following new rule: <b>Poutini Ngāi Tahu and Māori Purpose Activities within an Outstanding Natural Landscape described in Schedule Five or Outstanding Natural Feature described in Schedule Six not meeting Rule NFL - R11.Activity Status Discretionary Activity status where compliance not achieved: N/A</b>
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.358	Natural Features and Landscapes	NFL - R13	Support	We support this rule.	Retain rule.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.240	Natural Features and Landscapes	NFL - R13	Oppose	This activity should be non-complying, given the significant adverse effects associated with the activity.	Amend to make activity non-complying.
Buller District Council (S538)	S538.00650	Natural Features and Landscapes	NFL - R13	Support	With the exception of Rule 8 discussed below, Council generally supports the rule framework provided the requested amendments to the Ecosystems and Biodiversity Chapter are made to ensure that critical infrastructure, lawfully established activities, hazard mitigation activities etc are provided for. It is expected that there will be a close correlation between ONLFs and SNAs (once identified) therefore the rule framework should provide a consistent approach across the overlays.	Council seeks that a consistent approach is taken with the rule framework for activities within ONLs and SNAs
Te Mana Ora (Community and Public Health) of the	S190.359	Natural Features and Landscapes	NFL - R14	Support	We support this rule.	Retain rule.

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NPHS/ Te Whatu Ora (S190)						
John Brazil (S360)	S360.012	Natural Features and Landscapes	NFL - R14	Support	NFL - R14 I support this rule.	Retain as notified.
Manawa Energy Limited (Manawa Energy) (S438)	S438.101	Natural Features and Landscapes	NFL - R14	Support	Manawa supports the activity status afforded to activities subject to this rule.	Retain NFL - R14 as notified.
Steve Croasdale (S516)	S516.046	Natural Features and Landscapes	NFL - R14	Support		Retain
Westpower Limited (S547)	S547.306	Natural Features and Landscapes	NFL - R14	Amend	This is an appropriate consent category for the activities.	Retain
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.241	Natural Features and Landscapes	NFL - R14	Amend	This rule needs the reference included in other rules that any vegetation clearance associated with the EW will must comply with ECO chapter provisions.	Amend to include a standard that requires compliance with the ECO provisions for any associated vegetation clearance.
Geoff Volckman (S563)	S563.035	Natural Features and Landscapes	NFL - R14	Support		Retain
Catherine Smart-Simpson (S564)	S564.041	Natural Features and Landscapes	NFL - R14	Support		Retain
Koiterangi Lime Co LTD (S577)	S577.048	Natural Features and Landscapes	NFL - R14	Support		REtain
Karamea Lime Company (S614)	S614.057	Natural Features and Landscapes	NFL - R14	Support		Retain
Peter Langford (S615)	S615.057	Natural Features and Landscapes	NFL - R14	Support		Retain
Buller District Council (S538)	S538.00651	Natural Features and Landscapes	NFL - R14	Support	With the exception of Rule 8 discussed below, Council generally supports the rule framework provided the requested amendments to the Ecosystems and Biodiversity Chapter are made to ensure that critical infrastructure, lawfully established activities, hazard mitigation activities etc are provided for. It is expected that there will be a close correlation between ONLFs and SNAs (once identified) therefore the rule	Council seeks that a consistent approach is taken with the rule framework for activities within ONLs and SNAs

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					framework should provide a consistent approach across the overlays.	
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.360	Natural Features and Landscapes	NFL - R15	Support	We support this rule.	Retain rule.
John Brazil (S360)	S360.035	Natural Features and Landscapes	NFL - R15	Support	I support this rule	Retain R15
John Brazil (S360)	S360.036	Natural Features and Landscapes	NFL - R15	Support	I support this rule	Retain as notified.
New Zealand Coal & Carbon Limited (S472)	S472.021	Natural Features and Landscapes	NFL - R15	Support		Retain the Discretionary activity status of NFL-R15.
New Zealand Coal & Carbon Limited (S472)	S472.022	Natural Features and Landscapes	NFL - R15	Oppose in part	Appears to be a drafting error as no flow on from Controlled rules.	In the heading insert " <i>Controlled</i> " after the word "Permitted".
Steve Croasdale (S516)	S516.047	Natural Features and Landscapes	NFL - R15	Support		Retain
Straterra (S536)	S536.027	Natural Features and Landscapes	NFL - R15	Amend	the logic seems wrong,	Review the wording/logic of the rule
Straterra (S536)	S536.052	Natural Features and Landscapes	NFL - R15	Amend	Appears to be a drafting error with no lead provided in the rules for not meeting NFL-R10. Seems to be a similar situation to that described for ECO-R7 detailed above.	In the heading insert " <i>Controlled</i> " after the word "Permitted".
Westpower Limited (S547)	S547.307	Natural Features and Landscapes	NFL - R15	Amend	This is an appropriate consent category for the activities.	Retain
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.242	Natural Features and Landscapes	NFL - R15	Amend	This rule needs the reference included in other rules that any vegetation clearance associated with the EW will must comply with ECO chapter provisions.	Amend to include a standard that requires compliance with the ECO provisions for any associated vegetation clearance.
Geoff Volckman (S563)	S563.036	Natural Features and Landscapes	NFL - R15	Support		Retain
Catherine Smart-Simpson (S564)	S564.042	Natural Features and Landscapes	NFL - R15	Support		Retain

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Koiterangi Lime Co LTD (S577)	S577.049	Natural Features and Landscapes	NFL - R15	Support		Retain
Karamea Lime Company (S614)	S614.058	Natural Features and Landscapes	NFL - R15	Support		Retain
Peter Langford (S615)	S615.058	Natural Features and Landscapes	NFL - R15	Support		Retain
Buller District Council (S538)	S538.00652	Natural Features and Landscapes	NFL - R15	Support	With the exception of Rule 8 discussed below, Council generally supports the rule framework provided the requested amendments to the Ecosystems and Biodiversity Chapter are made to ensure that critical infrastructure, lawfully established activities, hazard mitigation activities etc are provided for. It is expected that there will be a close correlation between ONLFs and SNAs (once identified) therefore the rule framework should provide a consistent approach across the overlays.	Council seeks that a consistent approach is taken with the rule framework for activities within ONLs and SNAs
Grey District Council (S608)	S608.062	Public Access	PA	Oppose in part	Reference to the SASM overlay is removed	Remove all references to "Site or Area of Significance to Māori" in the Chapter
Grey District Council (S608)	S608.632	Public Access	PA	Not Stated	The inclusion of a chapter in the new plan on Public Access is supported. However, in its current form is it lacking in detail. In particular, this chapter should contain Objectives, policies, rule requirements, matter for control or discretion for the construction, design, approval for Unformed Legal roads. Guidance notes on the steps required to gain approval from Council to form (open) unformed legal road.	Amend
Herenga ā Nuku Aotearoa Outdoor Access Commission (S274)	S274.001	Public Access	Public Access	Support	We appreciate the improved recognition of the value of public access in the proposed plan. We support the inclusion of community values and rules that recognise and enable more public access and particularly walking, cycling and	Retain public access approach in the plan

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					other means of active transport. These connect communities and reduce the need to use vehicles.	
West Coast Fish and Game Council (S302)	S302.004	Public Access	Public Access	Support	The text is erroneous and misleading. Unformed legal road does not 'cross' private land, as the underlying title is not private. Adjoining land may be private, but the unformed legal road is not crossing that private land, even if the adjoining land on both sides of the unformed legal road is privately held.	Amend descriptive text as follows... Many also <del>eress</del> <b>bisect</b> private land or traverse sensitive ecological environments ...
Manawa Energy Limited (Manawa Energy) (S438)	S438.102	Public Access	Public Access	Not Stated	Manawa supports the maintenance and enhancement of public access to and along lakes and rivers, however, Manawa seeks that there is recognition of circumstances in which this access is not able to be provided or should be restricted for public safety or the functional and operational needs of infrastructure and REG. Manawa notes that the Resource Management Act envisages situations where public access may be closed or restricted to ensure protection and public safety, and also that the primary method for legal acquisition of public access is through subdivision of land.	Add a new policy as follows: <b>To maintain and enhance public access to and along the coastal marine area and waterbodies, while taking into account the need to ensure public safety and maintenance of the operational functional needs of infrastructure.</b>
Frida Inta (S553)	S553.224	Public Access	Public Access	Amend		There needs to be a policy including the purpose of esplanade strips
Department of Conservation (S602)	S602.099	Public Access	Public Access	Oppose	Oppose this chapter as it contains only one objective regarding the maintenance and enhancement of public access, and these matters are already sufficiently addressed in other chapters of this Plan.	Delete the Public Access - Te Āheinga Tūmatanui Chapter in its entirety.
Grey District Council (S608)	S608.605	Public Access	Public Access	Not Stated		The inclusion of a chapter in the new plan on Public Access is supported. However, in its

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						current form is it lacking in detail. In particular, this chapter should contain Objectives, policies, rule requirements, matter for control or discretion for the construction, design, approval for Unformed Legal roads. Guidance notes on the steps required to gain approval from Council to form (open) unformed legal road.
Herenga ā Nuku Aotearoa Outdoor Access Commission (S274)	S274.003	Public Access	Overview	Amend	<p>To provide a connection between the Public Access overview and objectives, and the provision of access to public resources, we recommend that the second sentence be extended.</p> <p>The introduction to Public Access concludes with notes about Unformed Legal Roads. The second sentence here notes that many unformed legal roads "cross private land or traverse sensitive ecological environments and careful decision making is needed to ensure that any new provision for public access through unformed legal roads is undertaken in a way that the impacts on natural resources and the safety and security of private landowners are well managed to avoid adverse effects on those resources and private landowners." We recommend that this be reworded as legal roads cannot cross private land, and the right of the public to pass and repass over legal roads is enshrined in law. Certainly, the safety and security of private landowners can be considered and managed should the legal road be used for public access, whether for a single walker or a newly formed road. However, the right of passage must be the priority and managing safety and</p>	<p>Amend Overview to extend the second sentence as follows: 'Provision of public access to waterbodies is also included in the primary purpose of the Walking Access Act 2008, <b>which is to "provide the New Zealand public with free, certain, enduring and practical access to the outdoors (including around the coast and lakes, along rivers, and to public resources) so that the public can enjoy the outdoors."</b></p> <p>Reword notes around unformed legal roads second sentence as follows:<b>Many separate or are adjacent to areas of private land or traverse sensitive ecological environments. Careful decision-making is needed to ensure any new public use of an unformed legal road is undertaken in a way that minimises any adverse effects on indigenous fauna and flora. Concerns of private landowners should be considered and mitigated where possible, although the right of the public to pass and repass over the legal road will be prioritised."</b></p>

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					security is likely to be the responsibility of the adjacent landowner.	
Steve Croasdale (S516)	S516.048	Public Access	Overview	Support		Retain
Buller Conservation Group (S552)	S552.093	Public Access	Overview	Amend	There needs to be a cross-reference to Natural Character, NC; P5.	<b>There needs to be a policy including the purpose of esplanade strips:(i) To protect conservation values on riparian and coastal margins and associated water quality and aquatic habitats.(ii) To ensure public access is maintained to and along water bodies where a proposed land use may reduce the ability to gain public access or where access is not currently available.(iii) To ensure recreational opportunities near water bodies are not lost where the proposed land use may reduce those opportunities or to provide recreational opportunities where these are not currently available. (iv) include, 'mitigating natural hazards', as in RMA s 229A cross-reference to Natural Character, NC; P5</b>
Frida Inta (S553)	S553.093	Public Access	Overview	Amend	There needs to be a cross-reference to Natural Character, NC; P5.	<b>A cross-reference to Natural Character, NC; P5</b>
Geoff Volckman (S563)	S563.037	Public Access	Overview	Support		Retain
Catherine Smart-Simpson (S564)	S564.043	Public Access	Overview	Support		Retain
William McLaughlin (S567)	S567.207	Public Access	Overview	Support		Retain
Koiterangi Lime Co LTD (S577)	S577.050	Public Access	Overview	Support	the discussion in the PA chapter preceding the objective.	Retain
Peter Langford (S615)	S615.059	Public Access	Overview	Support		Retain



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Westland District Council (S181)	S181.017	Public Access	Public Access Objective	Support	Council supports the Public Access Objective to maintain and enhance public access along the coastal marine area, waterbodies and public resources.	Retain the objective
John Brazil (S360)	S360.013	Public Access	Public Access Objective	Support	I support the discussion in the PA chapter preceding the objective.	Retain as notified.
David Ellerm (S581)	S581.029	Public Access	Public Access Objective	Support		Retain
Craig Schwitzer (S96)	S96.005	Public Access	PA - O1	Support	Support for access to coastal marine area, waterbodies and public resources such as unformed legal roads is essential. [refer to original submission for more detail]	Retain PA - O1.
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.362	Public Access	PA - O1	Support	We support this objective.	Retain objective.
John Brazil (S360)	S360.014	Public Access	PA - O1	Support	I support this single objective	Retain as notified.
Lyn McIntosh (S469)	S469.001	Public Access	PA - O1	Support	I support the intention of the plan to protect the rights of private landowners in the public access/unformed road section.	Retain the objective as notified and in particular the reference to protecting the rights of private landowners.
Steve Croasdale (S516)	S516.049	Public Access	PA - O1	Support		retain
Federated Farmers of New Zealand (S524)	S524.075	Public Access	PA - O1	Support in part	WCFF supports the spirit of this Objective however it needs to include recognition that this access should not result in adverse effects on the natural character or cultural values of the areas or the rights of private property owners. Many rural landowners, particularly coastal or riparian margin landowners,	Reword as: Customary and public access to and along the coastal marine area, waterbodies and public resources is provided for, maintained and enhanced where the access does not create adverse effects on the natural character, indigenous biodiversity, cultural values or the rights and obligations of private property

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					have had encounters with unwelcome trespassers, some with dogs, that are disruptive to their farming operations, put themselves into dangerous situations, or create nuisance effects like littering or human waste. It may also be appropriate and legal to limit access across private property during certain periods - for example when this will be unsafe or will disrupt farming activities, such as when tree felling or earthmoving is occurring, or during harvest or lambing.	owners.
Buller District Council (S538)	S538.221	Public Access	PA - O1	Support	Council supports the single objective and agrees that public access is appropriately provided for through other chapters of the plan.	Retain as notified.
Westpower Limited (S547)	S547.308	Public Access	PA - O1	Amend	reworded to be consistent with the RPS, Policy 4.b) Chapter 4.	Amend <b>The maintenance and enhancement of customary and public access to and along the coastal marine area, waterbodies and public resources where it contributes to the economic, social and cultural wellbeing of people and communities is promoted.</b>
Chris & Jan Coll (S558)	S558.129	Public Access	PA - O1	Support		Retain
Geoff Volckman (S563)	S563.038	Public Access	PA - O1	Support		Retain
Catherine Smart-Simpson (S564)	S564.044	Public Access	PA - O1	Support		Retain
Chris J Coll Surveying Limited (S566)	S566.129	Public Access	PA - O1	Support		Retain
William McLaughlin (S567)	S567.208	Public Access	PA - O1	Support		Retain
Laura Coll McLaughlin (S574)	S574.129	Public Access	PA - O1	Support		Retain

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Koiterangi Lime Co LTD (S577)	S577.051	Public Access	PA - O1	Support		REtain
Karamea Lime Company (S614)	S614.060	Public Access	PA - O1	Support		Retain
Peter Langford (S615)	S615.060	Public Access	PA - O1	Support		Retain
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.171	Public Access	PA - O1	Support	It is important that access for customary activities (e.g. mahinga kai) is maintained.	Retain as notified.
G.E. and C.J. Coates on behalf of Nikau Deer Farm Limited (S415)	S415.006	Natural Character and Margins of Waterbodies	NC	Oppose	This does not align with the Regional Council Rules such as, realignment of a water body after flooding is a permitted activity and only requires a phone call to advise of activity. Also, any riparian margin planting literally becomes an SNA. Also, there is not adequate provision for clearing existing and new fencelines. We have huge numbers of water bodies on the West Coast that are already protected by DOC. Where is the science to say that a private water body actually needs protecting on the West Coast?	Remove this provision as it is not required on the West Coast.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.243	Natural Character and Margins of Waterbodies	NC	Oppose	Forest & Bird makes a number of overarching submissions in relation to this chapter:	The whole chapter needs to be revised in line with submission points:  1. The rules should be at least as, if not more, stringent than the rules governing vegetation clearance in the ECO chapter (as amended by our submission). The margins of wetlands, lakes and rivers must be protected in accordance with both s6(a) and potentially s6(c). The objectives and policies only appear to deal with s6(a), it needs to be made clear that the objectives and policies of the ECO chapter will also apply, as these deal with s6(c) matters.

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Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.259	Natural Character and Margins of Waterbodies	NC	Amend	The rules do not give effect to P4.	Include new method or rule to give effect to P4.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.508	Natural Character and Margins of Waterbodies	NC	Oppose	Forest & Bird makes a number of overarching submissions in relation to this chapter:	2. In relation to the Earthworks chapter, we submitted that any vegetation clearance associated with earthworks should be managed by the ECO chapter. We make a similar submission here - all vegetation clearance associated with earthworks must be governed by rules at least as, if not more, stringent, than the ECO chapter as amended by our submission.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.509	Natural Character and Margins of Waterbodies	NC	Oppose	In terms of wetlands, this chapter appears to duplicate regulation of activities that are regulated in the margins of 'natural wetlands' under the NESFM. The provisions in this chapter are more lenient than the NESFM, contrary to reg. 6 NESFM.	This chapter needs to be thoroughly revised to remove duplication of the NESFM. Those rules will need to be deleted unless they are more stringent than the NESFM. It will also need to include provisions that apply to the margins of wetlands other than 'natural wetlands,' to ensure that these are protected in line with RMA requirements.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.510	Natural Character and Margins of Waterbodies	NC	Oppose	Consequential amendment	6. Amendments also need to be made to the Subdivision rules to ensure that waterbodies and their margins are protected in the subdivision process.
Grey District Council (S608)	S608.063	Natural Character and Margins of Waterbodies	NC	Oppose in part	Reference to the SASM overlay is removed	Remove all references to "Site or Area of Significance to Māori" in the Chapter
Westland District Council (S181)	S181.018	Natural Character and Margins of Waterbodies	Natural Character and Margins of Waterbodies	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
Westpower Limited (S547)	S547.309	Natural Character and Margins of Waterbodies	Natural Character and Margins of Waterbodies	Amend	do not adequately recognise and provide for existing energy activities and infrastructure.	Ensure appropriate recognition and provision for the existing energy activities and infrastructure located within them.
Westpower Limited (S547)	S547.310	Natural Character and Margins of Waterbodies	Natural Character and Margins of Waterbodies	Amend	Recognition and provision for existing energy activities and renewable energy generation.	Ensure provisions adequately recognise the importance of these activities and infrastructure to the community and the environment within which they must locate or traverse. This includes providing for the maintenance and enhancement of the generation and supply of renewable energy, including new activities, to enable communities.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.039	Natural Character and Margins of Waterbodies	Natural Character and Margins of Waterbodies	Amend	The Natural Character and Margins of Waterbodies chapter will not meet the requirements of s6(a) to preserve and protect the natural character of waterbodies and their margins. It is far too permissive to achieve that. It also appears to include provisions that duplicate the rules for activities in or near wetlands in the NESFM. District plans may not include provisions that are more lenient than the NESFM, however, this is what this Plan does. The chapter needs significant revision to remove the duplication. It also needs to include a much clearer statement about how the chapter and the NESFM work together.	Thoroughly revise the chapter to ensure the rules either remove duplication of, or are more stringent than, the regulations in the NESFM for 'natural wetlands' as defined by that document.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.044	Natural Character and Margins of Waterbodies	Natural Character and Margins of Waterbodies	Amend	We submit that there may be merit in incorporating the rules in this chapter into other chapters, such as ECO and EW. This would avoid the risk that this chapter is overlooked by Plan users when ascertaining the rule status of a proposed activity.	If the approach of a separate chapter for rules in riparian margins is retained, it must be referenced throughout the Plan in all relevant provisions and chapters.
Department of Conservation (S602)	S602.110	Natural Character and	Natural Character and	Neutral	DOC is neutral as these do not affect priority conservation values, biodiversity values, or DOC's interests.	NA

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
		Margins of Waterbodies	Margins of Waterbodies			
Herenga ā Nuku Aotearoa Outdoor Access Commission (S274)	S274.004	Natural Character and Margins of Waterbodies	Overview	Amend	<p>In the second sentence of the Overview, we recommend including recreation as a key value of waterbodies and their margins.</p> <p>The third paragraph of the Overview notes collaboration between district and regional councils and Poutini Ngāi Tahu for integrated management of waterbodies. We recommend that the Department of Conservation, NZ Landcare Trust, catchment care and other restoration groups, and Herenga ā Nuku Aotearoa, the Outdoor Access Commission be included here.</p> <p>Waterbodies provide significant active and passive recreational opportunities, whether for fishing, kayaking, coast or backcountry access, or simply sitting quietly. Public access is a key consideration. For example, when a landowner is considering fencing to protect riparian values, removing crack willow or other weeds and/or planting native species, such actions should not obstruct access where it is available. Where access can be provided, it should be included in project planning. The opportunities for access and recreation in relation to waterbodies and their margins can be reinforced at the end of the Overview.</p>	<p>Extend the second sentence of the Overview ed as follows: <b>"Waterbodies are connected (Ki uta ki tai -- from the mountains to the sea) and have important values, including for biodiversity, cultural, recreational or historical reasons."</b></p> <p>Add the following to the end of the Overview : <b>"Rivers, streams, lakes and wetlands have important recreational values including opportunities for access to and along waterways."</b></p>
Manawa Energy Limited (Manawa Energy) (S438)	S438.103	Natural Character and Margins of Waterbodies	Overview	Support in part	<p>Manawa notes the overview for this chapter focusses on natural and social values and does not acknowledge the important resource that waterbodies are for the region in terms of providing for hydroelectricity generation. Manawa</p>	<p>Amend the fifth paragraph of the Overview as follows:</p> <p>Rivers, streams, lakes and wetlands have important ecological, natural character and hydrological values and they provide important habitat for native fish, birds and</p>

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					considers that this should be specifically acknowledged in the overview as it sets the context for some waterbodies and in some cases is the reason that the waterbody exists today (e.g. the artificial reservoirs).	macroinvertebrate aquatic life. <b>Some waterbodies (both natural and artificial) also form an important resource for the generation of hydroelectricity which contributes to the wellbeing of people and communities.</b>
Westpower Limited (S547)	S547.312	Natural Character and Margins of Waterbodies	Overview	Amend	No identification or discussion of Strategic Objectives and Policies.	Add references to Strategic Objectives and Policies as per previous chapters.
Buller Conservation Group (S552)	S552.094	Natural Character and Margins of Waterbodies	Overview	Amend	The introduction needs to refer users of the Plan to the Land and Water Plan rules.	Insert at start of Overview: <b>Natural Character and the margins of waterbodies require protection as a matter of national importance under Section 6(a) of the RMA.</b>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.244	Natural Character and Margins of Waterbodies	Overview	Amend	There needs to be a much clearer statement about the relationship between this chapter and the regulations for wetlands in the NESFM.	Amend overview to include a much more detailed and clear explanation of relationship with NESFM, and activities regulated by NESFM, in line with submission points. Also include an explanation of how any wetland provisions in this chapter apply over and above the NESFM regulations.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.511	Natural Character and Margins of Waterbodies	Overview	Amend	The Overview needs to be clearer about the relationship between the provisions in this chapter and those in the ECO and EW chapters.	Include a clear explanation about the relationship between the provisions in this chapter and those in the ECO and EW chapters.
Department of Conservation (S602)	S602.100	Natural Character and Margins of Waterbodies	Overview	Amend	Amend the overview to make it explicit that the The Te Tai o Poutini also manages activities on the surface of waterbodies.	Amend paragraph 2 of the overview: ...Under section 31 of the RMA district councils are responsible for the management of activities on land, including the margins of waterbodies. <b>The Te Tai o Poutini also manages activities on the surface of waterbodies.</b> The West Coast Regional Council has responsibility for the management of wetlands, lakes and rivers, including land uses in the beds of rivers. This

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						section of Te Tai o Poutini Plan focuses on the natural character of the margins of wetlands, lakes, and rivers thereby avoiding duplication with Regional Council functions....
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.172	Natural Character and Margins of Waterbodies	Overview	Support	The fourth paragraph describes the importance of and associations with waterbodies to Poutini Ngāi Tahu.	Retain as notified.
Te Tumu Paeroa - The office of the Māori Trustee (S440)	S440.033	Natural Character and Margins of Waterbodies	Natural Character and the Margins of Waterbodies Objectives	Support	The Māori Trustee is generally comfortable with the objectives in the 'Natural Character and margins of waterbodies' chapter.	N/A
Buller District Council (S538)	S538.222	Natural Character and Margins of Waterbodies	Natural Character and the Margins of Waterbodies Objectives	Support	Council supports the objectives, polices and rules for Natural Character and Margins of Waterbodies as achieving an appropriate balance between providing for appropriate land uses and preserving natural character.	Retain as notified.
Chris & Jan Coll (S558)	S558.130	Natural Character and Margins of Waterbodies	Natural Character and the Margins of Waterbodies Objectives	Support		Retain
Geoff Volckman (S563)	S563.039	Natural Character and Margins of Waterbodies	Natural Character and the Margins of Waterbodies Objectives	Support		Retain
Catherine Smart-Simpson (S564)	S564.045	Natural Character and Margins of Waterbodies	Natural Character and the Margins of Waterbodies Objectives	Support		Retain



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Chris J Coll Surveying Limited (S566)	S566.130	Natural Character and Margins of Waterbodies	Natural Character and the Margins of Waterbodies Objectives	Support		Retain
William McLaughlin (S567)	S567.209	Natural Character and Margins of Waterbodies	Natural Character and the Margins of Waterbodies Objectives	Support		Retain
Laura Coll McLaughlin (S574)	S574.130	Natural Character and Margins of Waterbodies	Natural Character and the Margins of Waterbodies Objectives	Support		Retain
David Ellerm (S581)	S581.030	Natural Character and Margins of Waterbodies	Natural Character and the Margins of Waterbodies Objectives	Support		Retain
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.364	Natural Character and Margins of Waterbodies	NC - O1	Support in part	Te Mana Ora recommends that the Objectives of Natural Character and Margins of Waterbodies better reference the NPS-FM, to better ensure the health and wellbeing of freshwater ecosystems and protect freshwater quality for leisure, recreation and mahinga kai.	Amend NC-O1 as follows: To preserve and protect the natural character of lakes, rivers, and wetlands and their margins <del>while providing for appropriate</del> <b>and take a precautionary approach</b> to sub-division, use and development <del>where adverse effects can be avoided and mitigated</del> considering how any potential adverse effects can be avoided, minimised or mitigated <b>using the effects management hierarchy.</b>
Manawa Energy Limited (Manawa Energy) (S438)	S438.104	Natural Character and Margins of Waterbodies	NC - O1	Support in part	Manawa requests that reference is added to the ability of effects to be 'avoided, remedied or mitigated' to ensure consistency with terminology used in the Resource Management Act, and to recognise this is a valid approach to managing effects.	Amend NC - O1 as follows: To preserve the natural character of lakes, rivers and wetlands and their margins while providing for appropriate subdivision, use and development where adverse effects can be avoided, <b>remedied</b> or mitigated.
Karen Lippiatt (S439)	S439.030	Natural Character and	NC - O1	Oppose	The Plan is covering the need for resilience - building on the edge of a lake	Remove the Objective

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		Margins of Waterbodies			is not resilience. If it's not removed it needs measures in place, but it should be removed, as it's not consistent with coastal policy - why do I get prevented from building on my land on the coast while others get to build on the edge of a lake which can also rise in level.	
Waka Kotahi NZ Transport Agency (S450)	S450.101	Natural Character and Margins of Waterbodies	NC - O1	Support	Support the objective as it preserves the natural character while providing for appropriate subdivision, use and development where adverse effects can be avoided or mitigated.	Retain as proposed.
TiGa Minerals and Metals Limited (S493)	S493.063	Natural Character and Margins of Waterbodies	NC - O1	Support	Provides for activities to occur, provided adverse effects are avoided or mitigated.	Retain as notified.
Federated Farmers of New Zealand (S524)	S524.076	Natural Character and Margins of Waterbodies	NC - O1	Support	Support the provision for activities that need to locate in the margins of lakes, rivers and waterbodies.	Retain as notified.
Westpower Limited (S547)	S547.313	Natural Character and Margins of Waterbodies	NC - O1	Amend	The wording of existing RPS objectives is used to ensure consistency of wording.	Delete and amend to read: <b>1. To protect the natural character of the regions wetlands, and lakes and rivers and their margins, from inappropriate subdivision, use and development.2. Provide for appropriate subdivision, use and development to enable people and communities to maintain their economic, social and cultural wellbeing.</b>
Buller Conservation Group (S552)	S552.095	Natural Character and Margins of Waterbodies	NC - O1	Amend	There should be no development within the margins of waterbodies.	To preserve the natural character of lakes, rivers and wetlands and their margins <del>while providing for appropriate subdivision, use and development where adverse effects can be avoided or mitigated.</del>
Frida Inta (S553)	S553.095	Natural Character and Margins of Waterbodies	NC - O1	Amend	'appropriate' needs explanation.	To preserve the natural character of lakes, rivers and wetlands and their margins <del>while providing for appropriate subdivision, use and development where adverse effects can be</del>

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						avoided or mitigated.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.245	Natural Character and Margins of Waterbodies	NC - O1	Amend	The objective does not accurately reflect the requirements of the RMA and the WCRPS.	Delete and Replace: <b>Protect the natural character of wetlands, lakes and rivers and their margins, from inappropriate subdivision, use and development.</b>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.512	Natural Character and Margins of Waterbodies	NC - O1	Amend	It does not give enough direction to the protection of natural character.	Further, amendments need to be made to the subdivision rules to ensure this objective is met. The rules in this chapter do not regulate subdivision.
WMS Group (HQ) Limited and WMS Land Co. Limited (S599)	S599.068	Natural Character and Margins of Waterbodies	NC - O1	Support	This objective provides for activities to occur, provided adverse effects are avoided or mitigated.	Retain as notified
Birchfield Coal Mines Ltd (S601)	S601.049	Natural Character and Margins of Waterbodies	NC - O1	Support	This objective provides for activities to occur, provided adverse effects are avoided or mitigated.	Retain as notified.
Department of Conservation (S602)	S602.101	Natural Character and Margins of Waterbodies	NC - O1	Amend	Support Objective NC - O1 with amendments to ensure the effects management hierarchy is applied to appropriately manage adverse effects to protect the natural character of waterbodies and their margins in accordance with Section 6(a) of the Act.	Amend: To preserve the natural character of lakes, rivers and wetlands and their margins while <del>providing for</del> <b>allowing</b> appropriate subdivision, use and development where adverse effects can be <del>avoided or mitigated</del> <b>appropriately managed in accordance with the effects management hierarchy.</b>
BRM Developments Limited (S603)	S603.033	Natural Character and Margins of Waterbodies	NC - O1	Support	Provides for activities to occur, provided adverse effects are avoided or mitigated.	Retain as notified.
Birchfield Ross Mining Limited (S604)	S604.043	Natural Character and Margins of Waterbodies	NC - O1	Support	This objective provides for activities to occur	Retain as notified.

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Phoenix Minerals Limited (S606)	S606.034	Natural Character and Margins of Waterbodies	NC - O1	Support	Provides for activities to occur	Retain as notified.
Whyte Gold Limited (S607)	S607.032	Natural Character and Margins of Waterbodies	NC - O1	Support	Provides for activities to occur, provided adverse effects are avoided or mitigated.	Retain as notified.
Grey District Council (S608)	S608.064	Natural Character and Margins of Waterbodies	NC - O1	Amend	Re-worded to give better effect to Objective 7A(2) and Policy 7A(4) of the West Coast RPS.	Amend Objective 1 to now read: "To preserve the natural character of lakes, rivers and wetlands and their margins while providing for appropriate subdivision, use and development"
Grey District Council (S608)	S608.606	Natural Character and Margins of Waterbodies	NC - O1	Support	Support as written	Retain as proposed
Karamea Lime Company (S614)	S614.061	Natural Character and Margins of Waterbodies	NC - O1	Support		Retain
Peter Langford (S615)	S615.061	Natural Character and Margins of Waterbodies	NC - O1	Support		Retain
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.365	Natural Character and Margins of Waterbodies	NC - O2	Support	We support this objective.	Retain objective.
Federated Farmers of New Zealand (S524)	S524.133	Natural Character and Margins of Waterbodies	NC - O2	Support	Support the provision for activities that need to locate in the margins of lakes, rivers and waterbodies.	Retain as notified.
Royal Forest and Bird Protection Society of New	S560.246	Natural Character and Margins of Waterbodies	NC - O2	Support		Retain

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Zealand Inc. (Forest & Bird) (S560)						
Department of Conservation (S602)	S602.102	Natural Character and Margins of Waterbodies	NC - O2	Support	Support Objective NC-O2 as it appropriately recognises and provides for the relationship of Poutini Ngāi Tahu with the margins of waterbodies.	Retain Objective NC-O2 in its entirety.
Grey District Council (S608)	S608.607	Natural Character and Margins of Waterbodies	NC - O2	Support	Support as written	Retain as proposed
Karamea Lime Company (S614)	S614.062	Natural Character and Margins of Waterbodies	NC - O2	Support		Retain
Peter Langford (S615)	S615.062	Natural Character and Margins of Waterbodies	NC - O2	Support		Retain
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.173	Natural Character and Margins of Waterbodies	NC - O2	Support	This objective recognises the importance of water bodies to Poutini Ngāi Tahu.	Retain as notified
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.366	Natural Character and Margins of Waterbodies	NC - O3	Support in part	Te Mana Ora recommends that the Objectives of Natural Character and Margins of Waterbodies are amended to better reference the NPS-FM, to better ensure the health and wellbeing of freshwater ecosystems and protect freshwater quality for leisure, recreation and mahinga kai and activities important to Poutini Ngāi Tahu.	Amend NC-O3 as follows: To provide for activities which have a functional need in the margins of lakes, rivers, and wetlands <b>when there is no practicable alternative location or every other practicable alternative location would have adverse effects on the natural environment that is greater than, or equal to the proposed location</b> , and activities are done in such a way that the impacts on natural character are minimised <b>as specified in NC-O1.</b>
Manawa Energy Limited (Manawa Energy) (S438)	S438.105	Natural Character and Margins of Waterbodies	NC - O3	Support in part	Manawa opposes the use of the term 'minimise' as this is not a commonly used or understood term. It also seeks that the objective is simplified as the effects of	Amend NC - O3 as follows: <del>To provide for</del> <b>Activities which have a functional or operational need to locate in the margins of lakes, rivers and wetlands are provided for in</b>

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					activities are dealt with in other policy provisions	<del>such a way that the impacts on natural character are minimised.</del>
KiwiRail Holdings Limited (S442)	S442.060	Natural Character and Margins of Waterbodies	NC - O3	Amend	KiwiRail supports policy which recognises the functional need of an activity to be located in a certain area. However, KiwiRail seeks amendment to include operational need within this policy.	Amend as follows: To provide for activities which have a <b>n operational or</b> functional need to locate in the margins of lakes, rivers and wetlands in such a way that the impacts on natural character are minimised.
Waka Kotahi NZ Transport Agency (S450)	S450.102	Natural Character and Margins of Waterbodies	NC - O3	Support in part	Waka Kotahi generally supports the intent of the objective. However, there are many instances where the state highway network has an operational need to be located within margins of lakes, rivers, and wetlands. It is recommended that the objective be amended to include 'operational need'. This is consistent with NC-P2.c. Additionally, it is also considered that minimise can be an onerous requirement due to the open interpretation of this term. It is considered that significant adverse effects on natural character are better managed by avoiding, remedying, or mitigating. It is recommended that the rule be amended to reflect this.	Amend the objective as follows: To provide for activities which have a functional <b>or operational</b> need to locate in the margins of lakes, rivers and wetlands in such a way that <del>the any significant adverse effects</del> impacts on natural character are <del>minimised</del> <b>avoided, remedied or mitigated.</b>
Horticulture New Zealand (S486)	S486.035	Natural Character and Margins of Waterbodies	NC - O3	Support	HortNZ supports providing for activities which have a functional need to locate in the margins of lakes, rivers and wetlands.	Retain NC-O3
Bathurst Resources Limited and BT Mining Limited (S491)	S491.024	Natural Character and Margins of Waterbodies	NC - O3	Amend	To include operational as well as functional need.	Amend: To provide for activities which have a functional <b>or operational</b> need to locate in the margins of lakes, rivers and wetlands in such a way that the impacts on natural character are minimised.
TiGa Minerals and Metals Limited (S493)	S493.064	Natural Character and Margins of Waterbodies	NC - O3	Amend	Should recognise that some activities also have an operational need to locate.	Amend: To provide for activities which have a functional <b>or operational</b> need to locate in the margins of lakes, rivers and wetlands in such a way that the impacts on natural character are

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						minimised.
Federated Farmers of New Zealand (S524)	S524.134	Natural Character and Margins of Waterbodies	NC - O3	Support	Support the provision for activities that need to locate in the margins of lakes, rivers and waterbodies.	Retain as notified.
Westpower Limited (S547)	S547.314	Natural Character and Margins of Waterbodies	NC - O3	Amend	To reflect consistent wording and to provide for the managed approach.	Amend: To provide for activities which <b>due to technical, locational, functional or operational constraints or requirements</b> need to locate in the margins of lakes, rivers and wetlands <b>while managing adverse effects on natural character</b> .
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.247	Natural Character and Margins of Waterbodies	NC - O3	Oppose	Activities that have a functional need are not necessarily appropriate, these activities still need to be managed so that the natural character is preserved.	Delete
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.513	Natural Character and Margins of Waterbodies	NC - O3	Amend	Alternative relief	Amend: To <b>consider providing</b> provide for activities which have a functional need to locate in the margins of lake, rivers, and wetlands, where they can be undertaken in a way that preserves the in such a way that the impacts on natural character <del>are minimised.</del>
WMS Group (HQ) Limited and WMS Land Co. Limited (S599)	S599.069	Natural Character and Margins of Waterbodies	NC - O3	Amend	Recognises the functional need of some activities to occur within the margin of lakes, rivers and wetlands	Amend NC O3 as follows: To provide for activities which have a functional <b>or operational</b> need to locate in the margins of lakes, rivers and wetlands in such a way that the impacts on natural character are minimised.
Birchfield Coal Mines Ltd (S601)	S601.050	Natural Character and Margins of Waterbodies	NC - O3	Amend	Should recognise that some activities also have an operational need to locate within these environments.	Amend NC - O3 as follows: To provide for activities which have a functional <b>or operational</b> need to locate in the margins of lakes, rivers and wetlands in such a way that the impacts on natural character are minimised.

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Department of Conservation (S602)	S602.103	Natural Character and Margins of Waterbodies	NC - O3	Amend	Amend objective NC-O3 so that it is more directive, and uses language that better accords with the Act.	Amend Objective NC-O3:  To provide for activities which have a functional need to locate in the margins of lakes, rivers and wetlands <del>in such a way that the impacts</del> <b>while ensuring adverse effects</b> on natural character are minimised.
BRM Developments Limited (S603)	S603.034	Natural Character and Margins of Waterbodies	NC - O3	Amend	Should recognise that some activities also have an operational need to locate within these environments.	Amend NC - O3 as follows: To provide for activities which have a functional <b>or operational</b> need to locate in the margins of lakes, rivers and wetlands in such a way that the impacts on natural character are minimised.
Birchfield Ross Mining Limited (S604)	S604.044	Natural Character and Margins of Waterbodies	NC - O3	Amend	Should recognise that some activities also have an operational need to locate	Amend NC - O3 as follows: To provide for activities which have a functional <b>or operational</b> need to locate in the margins of lakes, rivers and wetlands in such a way that the impacts on natural character are minimised.
Phoenix Minerals Limited (S606)	S606.035	Natural Character and Margins of Waterbodies	NC - O3	Amend	Recognise that some activities also have an operational need to locate	Amend NC - O3: To provide for activities which have a functional <b>or operational</b> need to locate in the margins of lakes, rivers and wetlands in such a way that the impacts on natural character are minimised.
Whyte Gold Limited (S607)	S607.033	Natural Character and Margins of Waterbodies	NC - O3	Amend	Should recognise that some activities also have an operational need to locate	Amend NC - O3 as follows: To provide for activities which have a functional <b>or operational</b> need ...
Karamea Lime Company (S614)	S614.063	Natural Character and Margins of Waterbodies	NC - O3	Support		Retain
Peter Langford (S615)	S615.063	Natural Character and	NC - O3	Support		Retain



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		Margins of Waterbodies				
Transpower New Zealand Limited (S299)	S299.085	Natural Character and Margins of Waterbodies	Natural Character and the Margins of Waterbodies Policies	Amend	Transpower supports this note as it provides some clarification as to the relationship to the Energy Chapter, particularly in light of the sought National Grid specific policies within the ENG chapter which adopts a 'seek to avoid' approach for the National Grid. Transpower requests that it is moved into the 'overview' section so that it is more visible to plan users.	Retain this text and move to the 'overview' section
Te Tumu Paeroa - The office of the Māori Trustee (S440)	S440.034	Natural Character and Margins of Waterbodies	Natural Character and the Margins of Waterbodies Policies	Support	The Māori Trustee is generally comfortable with the policies in the 'Natural Character and margins of waterbodies' chapter.	N/A
Chris & Jan Coll (S558)	S558.132	Natural Character and Margins of Waterbodies	Natural Character and the Margins of Waterbodies Policies	Support		Retain
Geoff Volckman (S563)	S563.040	Natural Character and Margins of Waterbodies	Natural Character and the Margins of Waterbodies Policies	Support		Retain
Catherine Smart-Simpson (S564)	S564.046	Natural Character and Margins of Waterbodies	Natural Character and the Margins of Waterbodies Policies	Support		Retain
Chris J Coll Surveying Limited (S566)	S566.132	Natural Character and Margins of Waterbodies	Natural Character and the Margins of Waterbodies Policies	Support		Retain
William McLaughlin (S567)	S567.210	Natural Character and	Natural Character and	Support		Retain

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		Margins of Waterbodies	the Margins of Waterbodies Policies			
Laura Coll McLaughlin (S574)	S574.132	Natural Character and Margins of Waterbodies	Natural Character and the Margins of Waterbodies Policies	Support		Retain
David Ellerm (S581)	S581.031	Natural Character and Margins of Waterbodies	Natural Character and the Margins of Waterbodies Policies	Support		Retain
Buller District Council (S538)	S538.00653	Natural Character and Margins of Waterbodies	Natural Character and the Margins of Waterbodies Policies	Support	Council supports the objectives, polices and rules for Natural Character and Margins of Waterbodies as achieving an appropriate balance between providing for appropriate land uses and preserving natural character.	Retain as notified.
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.367	Natural Character and Margins of Waterbodies	NC - P1	Support	We support this policy.	Retain policy.
Herenga ā Nuku Aotearoa Outdoor Access Commission (S274)	S274.009	Natural Character and Margins of Waterbodies	NC - P1	Amend	NC-P1: Minimise the adverse effects of activities on the natural character of the riparian margins of lakes, rivers and wetlands by ensuring that subdivision and land use maintains the elements, patterns and processes that contribute to their natural character. We recommend adding "including public access" at the end of the sentence.	Amend NC - P1 by adding <b>"including public access"</b> at the end of the sentence.
Manawa Energy Limited (Manawa Energy) (S438)	S438.106	Natural Character and Margins of Waterbodies	NC - P1	Support in part	Manawa opposes the use of the term 'minimise' and seeks that this is replaced by terminology used in the Resource Management Act (i.e. 'avoid, remedy or mitigate') or 'manage' which is a term commonly used. It also seeks that the	Amend NC - P1 as follows: <b>Avoid, remedy or mitigate</b> the adverse effects of activities on the natural character of the riparian margins of lakes, rivers and wetlands by ensuring that subdivision and land use <b>protects maintains</b> the elements, patterns and processes that

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					policy is amended to use other correct terminology	contribute to <b>the identified</b> their natural character <b>values</b> .
Waka Kotahi NZ Transport Agency (S450)	S450.103	Natural Character and Margins of Waterbodies	NC - P1	Support in part	The rule is generally supported by Waka Kotahi. However, to ensure consistency with the submission point on NC-O3, it is sought that the rule be amended to replace minimise to avoid any potential onerous requirements from open interpretation of this term.	Amend the rule as follows: <b>Avoid, remedy or mitigate</b> <del>Minimise</del> <b>the any significant</b> adverse effects of activities on the natural character of the riparian...
Westpower Limited (S547)	S547.315	Natural Character and Margins of Waterbodies	NC - P1	Amend	Amend to reflect intent is to manage adverse effects and consistent wording.	Amend: <b>Avoid, remedy or mitigate the adverse effects of activities on the elements, patterns and processes that together contribute to the natural character of wetlands, lakes and rivers and their margins.</b>
Buller Conservation Group (S552)	S552.096	Natural Character and Margins of Waterbodies	NC - P1	Oppose	There is no need for P1 as P2 covers any anticipated activities in riparian margins.	delete
Frida Inta (S553)	S553.096	Natural Character and Margins of Waterbodies	NC - P1	Oppose	There is no need for P1 as P2 covers any anticipated activities in riparian margins.	delete
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.248	Natural Character and Margins of Waterbodies	NC - P1	Oppose in part	'Minimising' adverse effects is not an appropriate approach to effects management.	Amend: <b>Avoid</b> <del>Minimise</del> the adverse effects of activities on the natural character of the riparian margins of lakes, rivers, and wetlands by ensuring that subdivision, <b>development</b> and land use maintains the elements, patterns and processes that contribute to their natural character.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.514	Natural Character and Margins of Waterbodies	NC - P1	Amend	Consequential relief	Amend, or provide additional provisions in the Subdivision rules to ensure this policy is given effect to.

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Department of Conservation (S602)	S602.104	Natural Character and Margins of Waterbodies	NC - P1	Amend	Strengthen the intent of Policy NC-P1 by clarifying that subdivision and land use must be of a form and scale that is compatible with the natural character of riparian margins.	Amend: Minimise the adverse effects of activities on the natural character of the riparian margins of lakes, rivers and wetlands by ensuring that subdivision and land use <b>is of a form and scale that</b> maintains the elements, patterns and processes that contribute to their natural character.
Grey District Council (S608)	S608.608	Natural Character and Margins of Waterbodies	NC - 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.
Karamea Lime Company (S614)	S614.064	Natural Character and Margins of Waterbodies	NC - P1	Support		Retain
Peter Langford (S615)	S615.064	Natural Character and Margins of Waterbodies	NC - P1	Support		Retain
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.368	Natural Character and Margins of Waterbodies	NC - P2	Support	We strongly support this policy that allows provision of removal of indigenous vegetation and earthworks within riparian margins of lakes, rivers and wetlands, where significant adverse effects on natural character are minimised, for natural hazard mitigation activities and Poutini Ngāi Tahu cultural purpose uses for good public health outcomes .	Retain policy.
Manawa Energy Limited (Manawa Energy) (S438)	S438.107	Natural Character and Margins of Waterbodies	NC - P2	Support in part	Manawa opposes the use of the term 'minimise' and seeks that this is replaced by terminology used in the Resource Management Act (i.e. 'avoid, remedy or mitigate') and in the effects management hierarchy, or 'manage' which is a term	Amend NC - P2 as follows Provide for indigenous vegetation removal and earthworks within riparian margins of lakes, rivers and wetlands where significant adverse effects on natural character are <del>minimised</del> <b>avoided, remedied or mitigated and: ...</b>

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					commonly used. It also seeks that the policy is widened to provide for regionally significant infrastructure and the establishment, operation or maintenance of renewable electricity generation activities.	Provide for indigenous vegetation removal and earthworks within riparian margins of lakes, rivers and wetlands where significant adverse effects on natural character are <del>minimised</del> <b>avoided, remedied or mitigated</b> and: ... b. It is for the maintenance, repair and extension of network utilities and <b>regionally significant</b> infrastructure including the National Grid; or c. it is for the establishment, operation, maintenance or upgrading of renewable electricity generation <del>activities structures</del> ; or infrastructure where this has a functional or operational need to be located in a riparian margin...
KiwiRail Holdings Limited (S442)	S442.061	Natural Character and Margins of Waterbodies	NC - P2	Support	KiwiRail supports policy that provides for vegetation clearance and earthworks within riparian margins of lakes, rivers and wetlands if for the maintenance, repair, upgrade and extension of infrastructure and effects on natural character are minimised.	Retain as proposed
Waka Kotahi NZ Transport Agency (S450)	S450.104	Natural Character and Margins of Waterbodies	NC - P2	Support	Waka Kotahi supports the objective as it provides for the establishment, operation, maintenance or upgrading of infrastructure that has a functional or operational need to be located within the riparian margin. It also provides for the repair and maintenance of legally established structures.	Retain as proposed.
Inger Perkins (S462)	S462.017	Natural Character and Margins of Waterbodies	NC - P2	Amend	NC-P2 allows removal of indigenous vegetation and earthworks in riparian areas if for renewable energy generation. There are not enough checks and balances here to protect as yet unidentified significant natural areas, i.e. significant indigenous vegetation and significant habitats of indigenous fauna.	Add the following clause to the policy: <b>g) Adverse effects on significant indigenous vegetation and significant habitats of indigenous fauna are avoided.</b>

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Horticulture New Zealand (S486)	S486.036	Natural Character and Margins of Waterbodies	NC - P2	Support in part	Policy 2 provides for indigenous vegetation removal and earthworks in riparian margins for a number of reasons. HortNZ considers that food production should be added to the list.	Amend NC-P2 by adding: g) for food production purposes.
Bathurst Resources Limited and BT Mining Limited (S491)	S491.025	Natural Character and Margins of Waterbodies	NC - P2	Support	To broaden the consideration of lawfully established structures, to include all lawfully established activities.	Amend NC-P2 (e) as follows: Provide for indigenous vegetation ... as far as practicable and: ...(e) It is <b>to undertake legally established activities</b> or for the repair and maintenance of legally established structures; or
TiGa Minerals and Metals Limited (S493)	S493.065	Natural Character and Margins of Waterbodies	NC - P2	Amend	That some activities also have an operational need to locate within these environments.	Amend: Provide for indigenous vegetation removal, <b>minerals extraction, exploration and prospecting activities</b> and earthworks within riparian margins of lakes, rivers and wetlands where significant adverse effects on natural character are minimised as far as practicable and:
Federated Farmers of New Zealand (S524)	S524.077	Natural Character and Margins of Waterbodies	NC - P2	Support in part	Support the provision of indigenous vegetation removal and earthworks in the margins of lakes, rivers and waterbodies. The setbacks are in the definition of riparian margin 10m from wetland, 20m from lake, 10m from river over 3m wide. Federated Farmers seek that a purpose for removal is also for farm or pasture maintenance.	Amend NC-P2 by adding: g) For purpose of farm maintenance or pasture
Westpower Limited (S547)	S547.316	Natural Character and Margins of Waterbodies	NC - P2	Amend	Recognising that it may not always be possible to have minimal effect.	Amend: Provide for indigenous vegetation removal and ... where significant adverse effects on natural character are <b>avoided, remedied or mitigated</b> and;
Westpower Limited (S547)	S547.317	Natural Character and Margins of Waterbodies	NC - P2	Amend	Ensure consistent wording in terms of energy activities	Amend b. It is for the ... of network utilities, infrastructure, <b>energy activities and critical infrastructure</b> , including the national grid; or ...

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Westpower Limited (S547)	S547.318	Natural Character and Margins of Waterbodies	NC - P2	Amend	Ensure consistent wording in terms of the constraints and/or requirements of activities.	Amend c. It is for ... or infrastructure <b>and energy activities</b> where this has a <b>technical, locational</b> , functional or operational need ...: or ...
Buller Conservation Group (S552)	S552.097	Natural Character and Margins of Waterbodies	NC - P2	Amend	s6(a) requires the preservation of the natural character.	Provide for indigenous vegetation removal and earthworks within riparian margins of lakes, rivers and wetlands, <b>subject to regional rules, with where significant</b> adverse effects on natural character <del>are</del> minimized as far as practicable, and:
Frida Inta (S553)	S553.097	Natural Character and Margins of Waterbodies	NC - P2	Amend	s6(a) requires the preservation of the natural character.	Provide for indigenous vegetation removal and earthworks within riparian margins of lakes, rivers and wetlands, <b>subject to regional rules, with where significant</b> adverse effects on natural character <del>are</del> minimized as far as practicable, and:
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.249	Natural Character and Margins of Waterbodies	NC - P2	Oppose	This policy is completely contrary to the requirements of s6(a) and (c).	Delete.
WMS Group (HQ) Limited and WMS Land Co. Limited (S599)	S599.070	Natural Character and Margins of Waterbodies	NC - P2	Amend	minerals extraction activities are not covered by the definition of earthworks, additional wording is sought to provide for these activities which also have a functional or operational need to occur	Amend NC - P2 as follows: Provide for indigenous vegetation removal, <b>minerals extraction, exploration and prospecting activities</b> and earthworks within riparian margins of lakes, rivers and wetlands where significant adverse effects on natural character are minimised as far as practicable and:
Birchfield Coal Mines Ltd (S601)	S601.051	Natural Character and Margins of Waterbodies	NC - P2	Amend	To provide for these activities which also have a functional or operational need to occur within the margins of waterbodies.	Amend NC - P2 as follows: Provide for indigenous vegetation removal, <b>minerals extraction, exploration and prospecting activities</b> and earthworks within riparian margins of lakes, rivers and wetlands where

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						significant adverse effects on natural character are minimised as far as practicable and:
Department of Conservation (S602)	S602.105	Natural Character and Margins of Waterbodies	NC - P2	Amend	Strengthen the intent of Policy NC-P2 by replacing 'provide for' with the term 'allow' as this language is enabling and indigenous vegetation removal and earthworks within riparian margins should only be allowed for these activities where the adverse effects can be appropriately managed to protect the natural character of waterbodies and their margins in accordance with Section 6(a) of the Act.	Amend: <del>Provide for</del> <b>Allow</b> indigenous vegetation removal and earthworks within riparian margins of lakes, rivers and wetlands where significant adverse effects on natural character are minimised as far as practicable and: a. It is for the purpose of natural hazard mitigation; or b. It is for the maintenance, repair, upgrade and extension of network utilities and infrastructure including the national grid; or c. It is for the establishment, operation, maintenance or upgrading of renewable electricity generation structures or infrastructure where this has a functional or operational need to be located in a riparian margin; or c. It is for Poutini Ngāi Tahu cultural purposes; or d. It is for the repair and maintenance of legally established structures; or e. The activity has a functional or operational need to be located adjoining a waterbody.
BRM Developments Limited (S603)	S603.035	Natural Character and Margins of Waterbodies	NC - P2	Amend	To provide for these activities which also have a functional or operational need to occur within the margins of waterbodies.	Amend NC - P2 as follows: Provide for indigenous vegetation removal, <b>minerals extraction, exploration and prospecting activities</b> and earthworks within riparian margins of lakes, rivers and wetlands where significant adverse effects on natural character are minimised as far as practicable and:
Birchfield Ross Mining Limited (S604)	S604.045	Natural Character and Margins of Waterbodies	NC - P2	Amend	To provide for these activities which also have a functional or operational need to occur within the margins of waterbodies.	Amend NC - P2 as follows: Provide for indigenous vegetation removal, <b>minerals extraction, exploration and prospecting activities</b> and earthworks within riparian



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						margins of lakes, rivers and wetlands where significant adverse effects on natural character are minimised as far as practicable and:
Phoenix Minerals Limited (S606)	S606.036	Natural Character and Margins of Waterbodies	NC - P2	Amend	To provide for these activities which also have a functional or operational need to occur	Amend NC - P2 as follows: Provide for indigenous vegetation removal, <b>minerals extraction, exploration and prospecting activities</b> and earthworks within riparian margins of lakes, rivers and wetlands where significant adverse effects on natural character are minimised as far as practicable and:
Whyte Gold Limited (S607)	S607.034	Natural Character and Margins of Waterbodies	NC - P2	Amend	Provide for these activities which also have a functional or operational need	Amend NC - P2 as follows: Provide for indigenous vegetation removal, <b>minerals extraction, exploration and prospecting activities ...</b>
Grey District Council (S608)	S608.609	Natural Character and Margins of Waterbodies	NC - P2	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.
Karamea Lime Company (S614)	S614.065	Natural Character and Margins of Waterbodies	NC - P2	Support		Retain
Peter Langford (S615)	S615.065	Natural Character and Margins of Waterbodies	NC - P2	Support		Retain
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.174	Natural Character and Margins of Waterbodies	NC - P2	Amend	Provides for Poutini Ngāi Tahu cultural activities within riparian margins.	Retain as notified with the following amendment: ...d It is for <b>Poutini Ngāi Tahu activities or Māori Purpose Activities</b> cultural purposes; ...

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Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.175	Natural Character and Margins of Waterbodies	NC - P2	Amend	Needs to be inclusive of MPZ - Māori Purpose Zoned land and the Sites or Areas of Significance to Māori listed in Schedule Three	Amend the rule as follows: g. The establishment of a river crossing point up to 3m wide; or h. Poutini Ngāi Tahu activities; i. Activities on Māori Purpose Zoned land <b>or a site of significance to Māori in schedule three and is being</b> undertaken in accordance with an Iwi/Papatipu Rūnanga Management Plan; or j. Natural hazard mitigation activities undertaken by a statutory agency or their nominated contractor;
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.369	Natural Character and Margins of Waterbodies	NC - P3	Support	We support this policy.	Retain policy.
Manawa Energy Limited (Manawa Energy) (S438)	S438.108	Natural Character and Margins of Waterbodies	NC - P3	Support in part	Manawa supports the general intention of the policy and the recognition of the operational or functional need for many different kinds of buildings and structures to establish in riparian margins. It considers that clause b) should be more specific, and refer to the identified natural character of a riparian area (the intention being that such values would be identified in any assessment of effects accompanying a resource consent application) so that it is clear to all users of the Plan what is intended to be protected,	Amend NC - P3 as follows: Provide for buildings and structures within riparian margins of lakes, rivers and wetlands where these: a. Have a functional <b>or operational</b> need for their location; and b. They are of a form and scale that will not adversely effect the <b>identified</b> natural character of the riparian area.
Waka Kotahi NZ Transport Agency (S450)	S450.105	Natural Character and Margins of Waterbodies	NC - P3	Support in part	The policy is generally supported by Waka Kotahi as it provides for structures within riparian margins that have a functional need. However, there are many instances where state highway infrastructure has an operational need to be located within riparian margins as	a. Amend the policy as follows: Provide for buildings and structures within riparian margins of lakes, rivers and wetlands where these: Have a functional <b>or operational</b> need for their location; and They are of a form and scale that will not

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					there are times where there are no alternatives.	adversely affect the natural character of the riparian area.
Bathurst Resources Limited and BT Mining Limited (S491)	S491.026	Natural Character and Margins of Waterbodies	NC - P3	Amend	include operational need along with functional need.	Amend: Provide for buildings and structures within riparian margins of lakes, rivers and wetlands where these: a. Have a functional <b>or operational</b> need for their location; and
TiGa Minerals and Metals Limited (S493)	S493.066	Natural Character and Margins of Waterbodies	NC - P3	Amend	That some activities also have an operational need to locate within these environments.	Amend NC - P3 as follows: Provide for buildings and structures within riparian margins of lakes, rivers and wetlands where these: a. Have a functional <b>or operational</b> need for their location; and
Federated Farmers of New Zealand (S524)	S524.078	Natural Character and Margins of Waterbodies	NC - P3	Support	Support the provision for buildings and structures within riparian margins of lakes, rivers and wetlands. A functional need is for a pump shed to locate within the margin.	Retain as notified.
Westpower Limited (S547)	S547.319	Natural Character and Margins of Waterbodies	NC - P3	Amend	Consistency in terms of the constraints and/or requirements of energy activities.	Amend <b>a. Need to be undertaken in such areas due to technical, locational, Have a functional need for their location or operational constraints or requirements; and</b>
Westpower Limited (S547)	S547.320	Natural Character and Margins of Waterbodies	NC - P3	Amend	Consistency on the outcome sought in terms of adverse effects.	Amend <b>b. They avoid, remedy or mitigate adverse effects on the natural character of the riparian area.</b>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.250	Natural Character and Margins of Waterbodies	NC - P3	Oppose	This policy is contrary to s6(a) and (c).	Delete.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.515	Natural Character and Margins of Waterbodies	NC - P3	Oppose	There should not be policy direction enabling activities within the riparian margins of waterbodies.	Delete

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WMS Group (HQ) Limited and WMS Land Co. Limited (S599)	S599.071	Natural Character and Margins of Waterbodies	NC - P3	Amend	Should recognise that some activities also have an operational need to locate within these environments.	Amend NC - P3 as follows: Provide for buildings and structures within riparian margins of lakes, rivers and wetlands where these:  a. Have a functional <b>or operational</b> need for their location; and
Birchfield Coal Mines Ltd (S601)	S601.052	Natural Character and Margins of Waterbodies	NC - P3	Amend	Should recognise that some activities also have an operational need to locate within these environments.	Amend NC - P3 as follows: Provide for buildings and structures within riparian margins of lakes, rivers and wetlands where these: a. Have a functional <b>or operational</b> need for their location; and
Department of Conservation (S602)	S602.106	Natural Character and Margins of Waterbodies	NC - P3	Support	Support Policy NC-P3 which seeks to provide for buildings and structures within riparian margins only where there is a functional need and natural character is not adversely affected, as this suitably protects the natural character of these areas from inappropriate use and development.	Retain Policy NC-P3 in its entirety.
Department of Conservation (S602)	S602.109	Natural Character and Margins of Waterbodies	NC - P3	Oppose	Oppose Rule NC - R3 for the same reasons provided in DOCs submission to Rule NC-R2 above.	Delete Rule NC-R3 in its entirety.
BRM Developments Limited (S603)	S603.036	Natural Character and Margins of Waterbodies	NC - P3	Amend	Should recognise that some activities also have an operational need to locate within these environments.	Amend NC - P3 as follows: Provide for buildings and structures within riparian margins of lakes, rivers and wetlands where these: a. Have a functional <b>or operational</b> need for their location; and
Birchfield Ross Mining Limited (S604)	S604.046	Natural Character and Margins of Waterbodies	NC - P3	Amend	Should recognise that some activities also have an operational need to locate within these environments.	Amend NC - P3 as follows: Provide for buildings and structures within riparian margins of lakes, rivers and wetlands where these: a. Have a functional <b>or operational</b> need for their location; and

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Phoenix Minerals Limited (S606)	S606.037	Natural Character and Margins of Waterbodies	NC - P3	Amend	To recognise that some activities also have an operational need to locate	Amend NC - P3 as follows: Provide for buildings and structures within riparian margins of lakes, rivers and wetlands where these: a. Have a functional <b>or operational</b> need for their location; and
Whyte Gold Limited (S607)	S607.035	Natural Character and Margins of Waterbodies	NC - P3	Amend	Some activities also have an operational need to locate within these environments.	Amend NC - P3 as follows: Provide for ...: a. Have a functional <b>or operational</b> need for their location; and...
Grey District Council (S608)	S608.610	Natural Character and Margins of Waterbodies	NC - P3	Support in part	Inconsistent use of "effect" vs "affect". Many works must be in the riparian margin, no other option.	Amend accordingly throughout TTPP. "functional need" must include the lack of alternatives for many situations.
Karamea Lime Company (S614)	S614.066	Natural Character and Margins of Waterbodies	NC - P3	Support		Retain
Peter Langford (S615)	S615.066	Natural Character and Margins of Waterbodies	NC - P3	Support		Retain
New Zealand Agricultural Aviation Association (S166)	S166.017	Natural Character and Margins of Waterbodies	NC - P4	Support in part	Policy NC-P4 seeks to encourage the restoration and enhancement of the natural character of the riparian margins of lakes, rivers, and wetlands.  NZAAA supports the policy, noting that weeds and pests are a significant threat to the natural character of the riparian margins of lakes, rivers, and wetlands. NZAAA seeks to have weed and pest control acknowledged in the policy.	Retain NC-P4 and <b>add the words:including weed and pestcontrol.</b>
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.370	Natural Character and Margins of Waterbodies	NC - P4	Support	We support this policy.	Retain policy.

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Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.251	Natural Character and Margins of Waterbodies	NC - P4	Support	Support this policy.	Retain.
Department of Conservation (S602)	S602.107	Natural Character and Margins of Waterbodies	NC - P4	Support	Support Policy NC-P4 which seeks to encourage the restoration and enhancement of the natural character of the riparian margins of lakes, rivers and wetlands.	Retain Policy NC-P4 in its entirety.
Grey District Council (S608)	S608.611	Natural Character and Margins of Waterbodies	NC - P4	Support in part	Recognition that this may also include the requirement for activities/structures that are engineered, as per the corresponding other policies.	Amend accordingly throughout TTPP. "functional need" must include the lack of alternatives for many situations.
Karamea Lime Company (S614)	S614.067	Natural Character and Margins of Waterbodies	NC - P4	Support		Retain
Peter Langford (S615)	S615.067	Natural Character and Margins of Waterbodies	NC - P4	Support		Retain
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.371	Natural Character and Margins of Waterbodies	NC - P5	Support	We strongly support this policy that allows reduction in public access to waterbodies for natural hazard mitigation works required to protect communities from a significant natural hazard threat.	Retain policy.
Manawa Energy Limited (Manawa Energy) (S438)	S438.109	Natural Character and Margins of Waterbodies	NC - P5	Support in part	Manawa operates an extensive range of infrastructure in riparian areas, some of which requires the exclusion of public access to meet health and safety obligations. It is considered that this should be specifically recognised in this policy.	Amend NC - P5 as follows: Reduction in public access to waterbodies can be considered when natural hazard mitigation works are required to protect communities from a significant natural hazard threat <b>or when required for public safety due to the operational requirements of regionally significant infrastructure</b> . When assessing proposals for natural hazard structures, effects on public access should be considered and

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						ways to minimise them found, including:
Westpower Limited (S547)	S547.321	Natural Character and Margins of Waterbodies	NC - P5	Amend	There may also be instances where some reduction is required for health and safety.	Amend: Reduction in public access ... natural hazard threat <b>or for health and safety reasons</b> . When assessing <b>such</b> proposals effects on ..., including: ... b. Provisions of ... integrity of the structure <b>and/or health and safety</b> is maintained.
Buller Conservation Group (S552)	S552.098	Natural Character and Margins of Waterbodies	NC - P5	Amend	This may be better placed under PA - Public Access, or a cross-reference put in.	move to PA - Public Access, or a cross-reference put in.
Frida Inta (S553)	S553.098	Natural Character and Margins of Waterbodies	NC - P5	Amend	This may be better placed under PA - Public Access, or a cross-reference put in.	move to PA - Public Access, or a cross-reference put in.
Grey District Council (S608)	S608.612	Natural Character and Margins of Waterbodies	NC - P5	Support in part	Support as written	Retain as proposed
Karamea Lime Company (S614)	S614.068	Natural Character and Margins of Waterbodies	NC - P5	Support		Retain
Peter Langford (S615)	S615.068	Natural Character and Margins of Waterbodies	NC - P5	Support		Retain
Teresa Wyndham-Smith (S312)	S312.010	Natural Character and Margins of Waterbodies	Natural Character and the Margins of Waterbodies Rules	Support	Watercourses need more protection [refer submission for example of poor outcome of watercourse management where development has been too close to a watercourse leading to flooding, erosion and loss of natural character].	I would suggest that any construction be situated at least 15m from a watercourse, for the reasons above.
Marie Elder (S352)	S352.007	Natural Character and Margins of Waterbodies	Natural Character and the Margins of	Amend	Further protection of watercourses. The current requisite culvert at the Ross Subdivision at Te Mike is not enough in this karst landscape, for example two	Better protection of watercourses during development.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
			Waterbodies Rules		<p>watercourses in Ross Place have been cleared of indigenous vegetation and filled in with copious loads of gravel, albeit with culverts, in recent years, one for a commercial carpark and one for a now-abandoned building project. This disturbance of natural watercourses by piling gravel into a depression through which water previously flowed from an observed network of channels, has apparently caused water to find other routes of flow, creating at least two issues downstream:</p> <p>Truman Beach waterfall now runs muddy after rain, not noted previously, and Pavers on a downstream neighbours' carpark now float after rain, again not noted before</p>	
Manawa Energy Limited (Manawa Energy) (S438)	S438.112	Natural Character and Margins of Waterbodies	Natural Character and the Margins of Waterbodies Rules	Not Stated	To ensure consistency with the relief sought in NC - R1, Manawa requests that a new rule is added.	<p>Add a new rule NC - RX as follows:<b>Earthworks not meeting Permitted Activity Rule NC - R1 Activity Status Restricted Discretionary Discretion is restricted to:</b></p> <p><b>a) The location of any earthworks and indigenous vegetation clearance;</b></p> <p><b>b) Volume and area of earthworks and indigenous vegetation clearance;</b></p> <p><b>c) The effects on potential or existing public access to the riparian margin;</b></p> <p><b>d) Effects on habitats of any threatened or protected flora or fauna species;</b></p> <p><b>e) Effects on recreational values of public land; f) Effects on Poutini Ngāi Tahu values and any Sites and Areas of Significance to Māori identified in Schedule Three; and</b></p> <p><b>g) Landscape and visual effects.</b></p>
Te Tumu Paeroa - The office of the	S440.035	Natural Character and	Natural Character and	Support	The Māori Trustee is generally comfortable with the rules in the 'Natural	N/A



Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Māori Trustee (S440)		Margins of Waterbodies	the Margins of Waterbodies Rules		Character and margins of waterbodies' chapter.	
Straterra (S536)	S536.077	Natural Character and Margins of Waterbodies	Natural Character and the Margins of Waterbodies Rules	Amend	The Natural Character and Margins of Waterbodies chapter will need to be updated around wetland definitions and rules when the amendments to the NPS / NES FM are made.	Amend the chapter to reflect the most current NPSFM and NESFM requirements.
Westpower Limited (S547)	S547.322	Natural Character and Margins of Waterbodies	Natural Character and the Margins of Waterbodies Rules	Amend	There is general support for the rules listed below, with the amendments submitted, however it is noted that there are no controlled activity rules as per rule NFL-R10. Westpower submits that there is some benefit in such a rule in regard this matter. This is likely to assist with the practicalities of the provision of energy activities and infrastructure throughout the region and is a valid management mechanism for certain activities	Insert new controlled activity Rule: <ul style="list-style-type: none"> <li>- Provide for earthworks, vegetation clearance, buildings and structures.</li> <li>- Items e. and f. of NFL-R10 rule would be removed for the new rule.</li> <li>- Item 2 would be amended to include "Earthworks <b>and vegetation</b> ...".</li> <li>- Item c. under "Matters of control are:" would be removed.</li> <li>- The advice notes would need amendment as appropriate.</li> </ul>
Buller Conservation Group (S552)	S552.027	Natural Character and Margins of Waterbodies	Natural Character and the Margins of Waterbodies Rules	Amend	Streams between 1 and 3 metres wide have a 5 metre riparian setback	Increase setback in rules: <b>Streams between 1 and 3 metres wide have a 5 metre riparian setback, and all major (specified) rivers in the region have a 15 metre riparian setback</b>
Buller Conservation Group (S552)	S552.208	Natural Character and Margins of Waterbodies	Natural Character and the Margins of Waterbodies Rules	Support	Any reduction in that setback, for other than specified purposes, being a prohibited activity.	change activity status
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.040	Natural Character and Margins of Waterbodies	Natural Character and the Margins of Waterbodies Rules	Amend	We do support the Plan regulating activities in the margins of 'wetlands', as that is defined in the RMA, rather than only 'natural wetlands' as defined in the NESFM. As such, the Plan needs to include rules protecting the margins of wetlands not protected by the NESFM.	Include rules protecting all other wetlands that meet the RMA definition. The Councils have obligations to protect these wetlands over and above the regulations in the NESFM.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.041	Natural Character and Margins of Waterbodies	Natural Character and the Margins of Waterbodies Rules	Amend	The activities proposed to be permitted in riparian margins are completely inappropriate. All works should be set well back from riparian margins to even consider assigning them permitted status. The chapter covers vegetation clearance, earthworks, buildings, and structures in riparian margins. It appears that the intention is that the rules in other chapters, for example the vegetation clearance rules in the ECO chapter, will not apply. It appears to do this on the basis of s6(a). However, this approach does not give effect to s6(c). The proposed rules in this chapter would allow a lot of vegetation clearance, in areas that may be SNA. We seek that the rules be at least as stringent, if not more stringent than, the rules in the ECO chapter. Works in riparian margins may well need a stricter approach, given the effects that they can have. Earthworks rules may also need to mirror those, or be more stringent than, those in the EW chapter.	Revise the objectives, policies, and rules to give effect to s6(a) requirements. Remove permitted activities from all riparian margins. Include a method to encourage restoration.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.042	Natural Character and Margins of Waterbodies	Natural Character and the Margins of Waterbodies Rules	Amend	The chapter covers vegetation clearance, earthworks, buildings, and structures in riparian margins. Works in riparian margins may well need a stricter approach, given the effects that they can have. Earthworks rules may also need to mirror those, or be more stringent than, those in the EW chapter.	All vegetation clearance associated with earthworks must be governed by rules at least as, if not more, stringent, than the ECO chapter as amended by our submission.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.252	Natural Character and Margins of Waterbodies	Natural Character and the Margins of Waterbodies Rules	Amend	As submitted above, these rules duplicate, and are more lenient than, rules in the ENSFM regarding works in or adjacent to natural wetlands.	Review all rules in this chapter to remove duplications for natural wetlands rules in NESFM. Include rules to protect all other wetlands meeting the RMA definition of wetland, which are not covered by 'natural wetlands'.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.516	Natural Character and Margins of Waterbodies	Natural Character and the Margins of Waterbodies Rules	Amend	Policy 4 does not appear to have any methods to achieve it.	Include specific methods in the Plan to achieve this policy 4
Grey District Council (S608)	S608.065	Natural Character and Margins of Waterbodies	Natural Character and the Margins of Waterbodies Rules	Amend	Landowners should have the right to protect their own land from natural hazards	Add a Controlled Activity Rule for "New Natural Hazard Mitigation Structures". Rule is to read: <b>NC - R4 New Natural Hazard Mitigation Structures Activity Status</b> <b>Controlled Where: 1. These are constructed by any party other than a Statutory Agency or their authorized contractor, 2. Earthworks and vegetation clearance are the minimum required to undertake the activity. Discretion is restricted to: a. Managing effects on public access; b. Effects on the values that make up the degree of naturalness; c. Extent and design of earthworks; and d. Landscape measures.</b> As a result of the addition of this Rule, subsequent Rule numbering will need to be amended.
Grey District Council (S608)	S608.613	Natural Character and Margins of Waterbodies	Natural Character and the Margins of Waterbodies Rules	Oppose in part	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. For this section, the restrictions in NC-R1 render the other PA rules unusable.	Clarification on how this wording corresponds to standard best practice in the planning sector.
New Zealand Agricultural Aviation Association (S166)	S166.018	Natural Character and Margins of Waterbodies	NC - R1	Amend	There should be provision in the rules for the clearance of weeds and pests and for biosecurity purposes within the riparian margins	Amend NC-R1 <b>by adding: 1. k) clearance of weeds and pests and for biosecurity purposes</b>
Te Mana Ora (Community and Public Health) of the	S190.372	Natural Character and Margins of Waterbodies	NC - R1	Support	We support this rule that allows removal of indigenous vegetation and earthworks within riparian margins of lakes, rivers and wetlands, where significant adverse	Retain rule.

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NPHS/ Te Whatu Ora (S190)					effects on natural character are minimised, for natural hazard mitigation activities and Poutini Ngāi Tahu cultural purpose uses.	
Transpower New Zealand Limited (S299)	S299.084	Natural Character and Margins of Waterbodies	NC - R1	Amend	Transpower supports the inclusion of 'critical infrastructure' and 'network utilities' within this rule. The Advice Note should include specific reference to the Energy Chapter so that it is clear if those provisions also apply.	Retain the rule. Clarify relationship with Energy Chapter in the advice note
Manawa Energy Limited (Manawa Energy) (S438)	S438.110	Natural Character and Margins of Waterbodies	NC - R1	Support in part	<p>Manawa supports the provision for renewable electricity generation activities within this rule, however considers that the permitted earthworks quantities are unreasonably restrictive and do not adequately provide for the nature of renewable electricity generation activities. Further, these limitations exceed those associated with undertaking similar activities in other overlay areas (such as in outstanding natural landscapes and the high coastal natural character overlay). It seeks that these limits do not apply for Renewable Electricity Generation activities or at least be significantly increased to provide for regionally significant infrastructure activities.</p> <p>Manawa also opposes the activity status associated with activities where compliance is not achieved. It considers that restricted discretionary activity status is appropriate, with matters of discretion limited to the impacts on the riparian area. It notes that the status of discretionary exceeds that stated for earthworks not complying with permitted rules in other overlay chapters (for example - earthworks not meeting NFL -</p>	<p>Retain provision for infrastructure and renewable electricity generation and existing activities as notified.</p> <p>Amend NC - R1 as follows: Activity Status Permitted</p> <p>1. Where this is outside of any Significant Natural Area identified in Schedule Four, and for:</p> <p>a) Fence lines; or b) Maintenance, operation, minor upgrade and repair of network utilities, <del>critical</del> <b>regionally significant</b> infrastructure or renewable electricity generation activities; c) Connections to wastewater, stormwater and reticulated network utility systems; or d) Installation of an environmental monitoring and extreme weather event monitoring facility; or e) Maintenance and repair of lawfully established structures; or f) ...</p> <p>2. <b>For activities other than those provided for in clause 1 above, the amount of indigenous vegetation clearance is not greater than 20m<sup>2</sup> per 200m length of Riparian Margin;</b></p> <p>3. For activities other than those provided for in clause 1 above, Resource Management Act amount of earthworks is not greater than 20m<sup>3</sup> per 200m length of Riparian Margin;</p>

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					R6 (which applies to earthworks within an outstanding natural landscape described in schedule Five or Outstanding Natural Feature described in Schedule Six) are a controlled activity.	4. ... Activity Status where compliance not achieved: Restricted Discretionary
KiwiRail Holdings Limited (S442)	S442.062	Natural Character and Margins of Waterbodies	NC - R1	Support	KiwiRail supports the permitted activity status of maintenance, operation, minor upgrade and repair of critical infrastructure.	Retain as proposed
Waka Kotahi NZ Transport Agency (S450)	S450.106	Natural Character and Margins of Waterbodies	NC - R1	Support	Waka Kotahi supports the rule as it provides for a permitted level of vegetation clearance and earthworks in the riparian margins for rivers, lakes, or wetlands.	Retain as proposed.
Horticulture New Zealand (S486)	S486.037	Natural Character and Margins of Waterbodies	NC - R1	Support in part	NC-R1 provides for activities within the margins. HortNZ seeks that food production is included within the activities provided for.	Amend NC-R1 by adding to 1: k) Food production purpose l) Biosecurity purposes
Bathurst Resources Limited and BT Mining Limited (S491)	S491.027	Natural Character and Margins of Waterbodies	NC - R1	Support		Amend (e) <b>To undertake legally established activities or</b> for the maintenance and repair of lawfully established structures; or
New Zealand Defence Force (S519)	S519.030	Natural Character and Margins of Waterbodies	NC - R1	Amend	NZDF seeks to amend Rule NC - R1 to provide for Indigenous Vegetation Clearance and Earthworks within the Riparian Margin of a River, Lake or Wetland associated with bridges and / or dams constructed as part of TMTA, as a permitted activity.	Amend Rule NC - R1 to state: Activity Status Permitted 1. Where this is outside of any Significant Natural Area identified in Schedule Four, and for: ..... <b>k. bridges and / or dams constructed as part of a Temporary Military Training Activity</b>
Federated Farmers of New Zealand (S524)	S524.079	Natural Character and Margins of Waterbodies	NC - R1	Support in part	Support recognition that fence lines may be in the riparian zone. However there also needs to be provision for farm or pasture maintenance within the riparian margin and also removal of vegetation for biosecurity purposes.	Amend NC-R1 to add: 1 k) farm and pasture maintenance 1 l) biosecurity purposes
Buller District Council (S538)	S538.223	Natural Character and Margins of Waterbodies	NC - R1	Oppose in part	Rule 1 limits hazard mitigation activities to statutory agencies or their nominated contractors under Clause 1(j). River protection works are a common	Amend Rule 1 as follows: 1. Where this is outside of any Significant Natural Area identified in Schedule Four, and for: .....

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					<p>occurrence across the district and Council does not wish to see this triggering the need for consent where landowners are undertaking natural hazard mitigation activities in order to protect people and property.</p> <p>Generally speaking, any substantial river protection works will require regional consent where the Regional Land &amp; Water Plan and the RPS require consideration of the natural character implications of natural hazard measures. Therefore, Council seeks that natural hazard mitigation activities are not qualified by who undertakes the work.</p> <p>Council also has concerns with Clause 5 and what this is intended to achieve. If this is intended to protect public assets, then it is suggested that this is stated in clearer terms.</p>	<p>j. Natural hazard mitigation activities undertaken by a statutory agency or their nominated contractor ...</p>
Westpower Limited (S547)	S547.323	Natural Character and Margins of Waterbodies	NC - R1	Amend	For consistency of reference to energy activities and associated infrastructure.	Amend b. Maintenance, operation ... of network utilities, <b>infrastructure, energy activities, critical infrastructure or ...</b> ;"
Westpower Limited (S547)	S547.324	Natural Character and Margins of Waterbodies	NC - R1	Amend	It will not be sufficient to enable the cited energy activities to be undertaken	Amend c. Connections to ... utility systems, <b>including energy activities and infrastructure</b> ; or
Westpower Limited (S547)	S547.325	Natural Character and Margins of Waterbodies	NC - R1	Amend	vegetation clearance and earthworks limits proposed do not appear to add up.	Amend g. The establishment of a river crossing point up to 3m wide, <b>or in the case of energy activities 10m to allow for safe operation</b> ; or ...
Westpower Limited (S547)	S547.326	Natural Character and Margins of Waterbodies	NC - R1	Amend	Width of 10m is required to appropriately provide for energy activities.	Amend items 2. and 3. to be calculated consistent with item f. and the width of riparian margins.

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Westpower Limited (S547)	S547.327	Natural Character and Margins of Waterbodies	NC - R1	Amend	Width of 10m is required to appropriately provide for energy activities.	Add <b>6. Notwithstanding the areas or volumes in items 2. and 3. vegetation clearance and earthworks activities undertaken for energy activities, including energy aspects of infrastructure, shall be the minimum necessary to achieve the activity provided for in items b., c., e., g., and j. above.</b>
Buller Conservation Group (S552)	S552.099	Natural Character and Margins of Waterbodies	NC - R1	Amend	a Fencelines should not be allowed within a riparian margin	1.a. Delete
Buller Conservation Group (S552)	S552.214	Natural Character and Margins of Waterbodies	NC - R1	Amend	Concerns about parks facilities and parks furniture within riparian margins	f. f needs to be combined with (g).
Buller Conservation Group (S552)	S552.215	Natural Character and Margins of Waterbodies	NC - R1	Oppose	There should be no leniency for Maori purpose activities	h, i Delete
Buller Conservation Group (S552)	S552.216	Natural Character and Margins of Waterbodies	NC - R1	Amend	The rules around whitebaiting need to be tightened.	k. <b>Whitebaiting where there is nodriveway to the stand, nor solid, perennial shelters and whitebaitingstructures.</b>
Buller Conservation Group (S552)	S552.217	Natural Character and Margins of Waterbodies	NC - R1	Oppose	Breaches of this rule for hazard mitigation work may occur, with the work being cited as emergency	j. Delete
Buller Conservation Group (S552)	S552.218	Natural Character and Margins of Waterbodies	NC - R1	Amend	very often the riparian margins are vested with LINZ as hydro.	<b>l. riparian margins that arevested with LINZ as hydro.</b>
Frida Inta (S553)	S553.099	Natural Character and Margins of Waterbodies	NC - R1	Amend	fencing is an inappropriate development and use within riparian margins.	1.a. Delete
Frida Inta (S553)	S553.218	Natural Character and	NC - R1	Amend	There could be numerous riparian openings all providing bits of the same service.	f. f needs to be combined with (g).

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
		Margins of Waterbodies				
Frida Inta (S553)	S553.219	Natural Character and Margins of Waterbodies	NC - R1	Support	No leniency for Maori purpose activities, protection is a matter of national importance.	Delete h. and i.
Frida Inta (S553)	S553.220	Natural Character and Margins of Waterbodies	NC - R1	Amend	Breaches cited as emergency even though it is not.	Delete j.
Frida Inta (S553)	S553.221	Natural Character and Margins of Waterbodies	NC - R1	Amend	Not ok to put in a driveway at every stand, nor solid, perennial shelters and whitebaiting structures.	<b>k. Whitebaiting where there is no driveway to the stand, nor solid, perennial shelters and whitebaiting structures.</b>
Frida Inta (S553)	S553.222	Natural Character and Margins of Waterbodies	NC - R1	Amend	Plan concerns itself with riparian margins, and the surface of water; is this not a conflict?	Add l. riparian margins that are vested with LINZ as hydro.
Frida Inta (S553)	S553.223	Natural Character and Margins of Waterbodies	NC - R1	Amend	There should be within the rule a mandate to enhance riparian margin elsewhere	<b>3. 20m<sup>2</sup> per 200m length where the works is offset by riparian margin enhancement elsewhere.</b>
Chris & Jan Coll (S558)	S558.133	Natural Character and Margins of Waterbodies	NC - R1	Amend	Unnecessarily restrictive to restrict the rule for natural hazard mitigation structures.	Delete point 1. j. and 5.
Chris & Jan Coll (S558)	S558.134	Natural Character and Margins of Waterbodies	NC - R1	Amend	Natural hazard mitigation structures unnecessarily restrictive	Amend status when compliance is not achieved for natural hazard mitigation structures to controlled.
Chris & Jan Coll (S558)	S558.135	Natural Character and Margins of Waterbodies	NC - R1	Amend	Too restrictive	Amend status when compliance is not achieved for remaining activities to Restricted Discretionary which requires a new rule.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.253	Natural Character and Margins of Waterbodies	NC - R1	Oppose	These activities are not appropriate in the margins of waterbodies. The standards do not ensure that the natural character (or the biodiversity values) of the	Delete, and amend to at least discretionary.



Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					waterbody and its margins will be preserved and protected.	
Chris J Coll Surveying Limited (S566)	S566.133	Natural Character and Margins of Waterbodies	NC - R1	Amend	Unnecessarily restrictive to restrict the rule for natural hazard mitigation structures.	Delete point 1. j. and 5.
Chris J Coll Surveying Limited (S566)	S566.134	Natural Character and Margins of Waterbodies	NC - R1	Amend	Natural hazard mitigation structures unnecessarily restrictive	Amend status when compliance is not achieved for natural hazard mitigation structures to controlled.
Chris J Coll Surveying Limited (S566)	S566.135	Natural Character and Margins of Waterbodies	NC - R1	Amend	Too restrictive	Amend status when compliance is not achieved for remaining activities to Restricted Discretionary which requires a new rule.
William McLaughlin (S567)	S567.211	Natural Character and Margins of Waterbodies	NC - R1	Amend	Unnecessarily restrictive to restrict the rule for natural hazard mitigation structures.	Delete point 1. j. and 5.
William McLaughlin (S567)	S567.212	Natural Character and Margins of Waterbodies	NC - R1	Amend	Natural hazard mitigation structures unnecessarily restrictive	Amend status when compliance is not achieved for natural hazard mitigation structures to controlled.
William McLaughlin (S567)	S567.213	Natural Character and Margins of Waterbodies	NC - R1	Amend	Too restrictive	Amend status when compliance is not achieved for remaining activities to Restricted Discretionary which requires a new rule.
Laura Coll McLaughlin (S574)	S574.133	Natural Character and Margins of Waterbodies	NC - R1	Amend	Unnecessarily restrictive to restrict the rule for natural hazard mitigation structures.	Delete point 1. j. and 5.
Laura Coll McLaughlin (S574)	S574.134	Natural Character and Margins of Waterbodies	NC - R1	Amend	Natural hazard mitigation structures unnecessarily restrictive	Amend status when compliance is not achieved for natural hazard mitigation structures to controlled.
Laura Coll McLaughlin (S574)	S574.135	Natural Character and Margins of Waterbodies	NC - R1	Amend	Too restrictive	Amend status when compliance is not achieved for remaining activities to Restricted Discretionary which requires a new rule.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Grey District Council (S608)	S608.614	Natural Character and Margins of Waterbodies	NC - R1	Oppose in part	The overly restrictive requirements re condition 3, when there are other more applicable rules for the construction of structures in the riparian margin to protect the integrity of the road network, makes both of the following PA rules useless. An activity that should otherwise be permitted as a structure and /or flood mitigation will always be tripped up.	Consider more clarification on how specific rules will apply to specific activities and limit when the general standards apply. Concerns over the overlap between this chapter and the requirements of the WCRC. These are regional matters and are an unnecessary double up with resource consent requirements under the RLWP.
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.176	Natural Character and Margins of Waterbodies	NC - R1	Amend	Activity needs to be inclusive of MPZ - Māori Purpose Zoned land and the Sites or Areas of Significance to Māori listed in Schedule Three	Amend the rule as follows: g. The establishment of a river crossing point up to 3m wide; or h. Poutini Ngāi Tahu activities; i. Activities on Māori Purpose Zoned land <b>or a site of significance to Māori in schedule three and is being</b> and undertaken in accordance with an Iwi/Papatipu Rūnanga Management Plan; or j. Natural hazard mitigation activities undertaken by a statutory agency or their nominated contractor;
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.373	Natural Character and Margins of Waterbodies	NC - R2	Support	We support this rule.	Retain rule.
West Coast Fish and Game Council (S302)	S302.005	Natural Character and Margins of Waterbodies	NC - R2	Support	Mai Mai are essential to lawful gamebird hunting activities, and must be constructed either within the riparian margin of a lake or river/wetland, or over the surface of the waterbody.	Amend NC - R2 Buildings or structures within the Riparian margin of a river, Lake or Wetland. Amend Permitted Activity Rule by adding the following wording to the list of permitted buildings and structures; <b>Temporary Mai Mai for game bird hunting</b>
Manawa Energy Limited (Manawa Energy) (S438)	S438.111	Natural Character and Margins of Waterbodies	NC - R2	Support in part	Manawa supports the specific recognition of buildings and structures which are renewable electricity generation facilities as permitted activities in the riparian margin of a river, lake or wetland where	Amend NC - R2 (f) as follows: f. Renewable electricity generation facilities where these have a functional <b>or operational</b> need to locate within the riparian margin;

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					these have a functional need to locate within a riparian margin. However it considers that recognition should also be made of the operational need for such buildings to locate in these areas.	
KiwiRail Holdings Limited (S442)	S442.063	Natural Character and Margins of Waterbodies	NC - R2	Amend	KiwiRail seeks amendment to this rule to ensure it applies to buildings and structures ancillary to critical infrastructure. Parts of the rail network are adjacent to rivers within the West Coast. KiwiRail seeks permitted activity status of structures necessary to protect the rail corridor in these dynamic environments.	a. Amend as follows: Activity Status Permitted Where the buildings and structures are: Network utilities; Temporary whitebait stands; Environmental monitoring facilities; Parks facilities and parks furniture within an Open Space and Recreation Zone; Natural hazard mitigation structures constructed by a statutory agency or their nominated contractor; or Renewable electricity generation facilities where these have a functional need to locate within the riparian margin; or Stormwater discharge structures and water supply intake structures constructed in accordance with NZS 4404 Code of Practice for Land Development and Subdivision Infrastructure ; or <b>Critical infrastructure.</b>
Waka Kotahi NZ Transport Agency (S450)	S450.107	Natural Character and Margins of Waterbodies	NC - R2	Support	Waka Kotahi supports this rule as it allows for buildings or structures for network utilities within riparian margins, which can include structures that relate to state highway infrastructure.	Retain as proposed.
Horticulture New Zealand (S486)	S486.038	Natural Character and Margins of Waterbodies	NC - R2	Support in part	There should be provision for pump sheds within the riparian margins as they have a functional need to locate in the area adjacent to a water body.	Amend NC-R2 by adding to 1: h) pump sheds
Bathurst Resources Limited and BT Mining Limited (S491)	S491.028	Natural Character and Margins of Waterbodies	NC - R2	Amend	Structures associated with lawfully established activities, or operational or functional need.	Add <b>h. Associated with a lawfully established activity, and have an operational or functional need to be in that location.</b>
New Zealand Defence Force (S519)	S519.031	Natural Character and Margins of Waterbodies	NC - R2	Amend	NZDF seeks to amend Rule NC - R2 to provide for bridges and/or dams constructed within the Riparian Margin of a River, Lake or Wetland, as part of TMTA, as a permitted activity.	Amend Rule NC - R2 to state: Activity Status Permitted 1. Where the buildings and structures are: ..... <b>h. Bridges and / or dams constructed as part of a Temporary Military</b>

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						<b>Training Activity</b>
Federated Farmers of New Zealand (S524)	S524.080	Natural Character and Margins of Waterbodies	NC - R2	Support in part	There should be provision for pump sheds which have a functional need to locate within the riparian margin.	Amend NC-R2: 1 h) pump sheds
Buller District Council (S538)	S538.224	Natural Character and Margins of Waterbodies	NC - R2	Oppose in part	For the same reasons as stated above, Council seeks the removal of the limitation of hazard mitigation activities to statutory agencies or their nominated contractors.	Amend Rule 2 as follows:  1. Where the buildings and structures are: ..... e. Natural hazard mitigation structures <del>constructed by a state agency or their nominated contractor;</del> or ....
Westpower Limited (S547)	S547.328	Natural Character and Margins of Waterbodies	NC - R2	Amend	Consistency across the plan for terms used relating to energy activities.	Amend a. Network utilities, <b>including energy activities and infrastructure;</b>
Westpower Limited (S547)	S547.329	Natural Character and Margins of Waterbodies	NC - R2	Amend	Provide for constraints and/or requirements of energy activities.	Amend f. Renewable electricity generation <b>activities</b> where these have a <b>need to locate within the riparian margin dues to technical, locational, functional or operational constraints or requirements;</b> or
Buller Conservation Group (S552)	S552.100	Natural Character and Margins of Waterbodies	NC - R2	Amend	Needs to say have a functional need to be located in the riparian margin.	<b>have a functional need to be located in the riparian margin.</b>
Frida Inta (S553)	S553.100	Natural Character and Margins of Waterbodies	NC - R2	Amend	At the beginning or end it needs to say have a functional need to be located in the riparian margin.	<b>have a functional need to be located in the riparian margin.</b>
Chris & Jan Coll (S558)	S558.136	Natural Character and Margins of Waterbodies	NC - R2	Amend	unnecessarily restrictive for natural hazard mitigation structures.	Delete point 1. e.
Chris & Jan Coll (S558)	S558.137	Natural Character and	NC - R2	Amend	unnecessarily restrictive for natural hazard mitigation structures.	If this is not accepted, amend status when compliance is not achieved for natural hazard

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		Margins of Waterbodies				mitigation structures to controlled.
Chris & Jan Coll (S558)	S558.139	Natural Character and Margins of Waterbodies	NC - R2	Amend	the activity status when compliance is not achieved is too restrictive.	Alternative relief, amend status when compliance is not achieved to controlled.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.254	Natural Character and Margins of Waterbodies	NC - R2	Oppose	These activities are not appropriate in the margins of waterbodies. The standards do not ensure that the natural character (or the biodiversity values) of the waterbody and its margins will be preserved and protected.	Delete, and amend to at least discretionary.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.486	Natural Character and Margins of Waterbodies	NC - R2	Amend	Condition 2. Support the link with NC- R2 however clearance at the permitted level should also be limited to the purposes set out in ECO-R1 as amended in this submission.	Consider making consequential changes to NC-R2 to rely on ECO-R1, including for example NC-R2 standards/conditions 2 and 5 becoming conditions in ECO-R1 or as separate standards to be met by both ECO-R1 and NC-R2.
Chris J Coll Surveying Limited (S566)	S566.136	Natural Character and Margins of Waterbodies	NC - R2	Amend	unnecessarily restrictive for natural hazard mitigation structures.	Delete point 1. e.
Chris J Coll Surveying Limited (S566)	S566.137	Natural Character and Margins of Waterbodies	NC - R2	Amend	unnecessarily restrictive for natural hazard mitigation structures.	If this is not accepted, amend status when compliance is not achieved for natural hazard mitigation structures to controlled.
Chris J Coll Surveying Limited (S566)	S566.139	Natural Character and Margins of Waterbodies	NC - R2	Amend	the activity status when compliance is not achieved is too restrictive.	Alternative relief, amend status when compliance is not achieved to controlled.
William McLaughlin (S567)	S567.214	Natural Character and Margins of Waterbodies	NC - R2	Amend	unnecessarily restrictive for natural hazard mitigation structures.	Delete point 1. e.
William McLaughlin (S567)	S567.215	Natural Character and Margins of Waterbodies	NC - R2	Amend	unnecessarily restrictive for natural hazard mitigation structures.	If this is not accepted, amend status when compliance is not achieved for natural hazard mitigation structures to controlled.

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William McLaughlin (S567)	S567.217	Natural Character and Margins of Waterbodies	NC - R2	Amend	the activity status when compliance is not achieved is too restrictive.	Alternative relief, amend status when compliance is not achieved to controlled.
Laura Coll McLaughlin (S574)	S574.136	Natural Character and Margins of Waterbodies	NC - R2	Amend	unnecessarily restrictive for natural hazard mitigation structures.	Delete point 1. e.
Laura Coll McLaughlin (S574)	S574.137	Natural Character and Margins of Waterbodies	NC - R2	Amend	unnecessarily restrictive for natural hazard mitigation structures.	If this is not accepted, amend status when compliance is not achieved for natural hazard mitigation structures to controlled.
Laura Coll McLaughlin (S574)	S574.139	Natural Character and Margins of Waterbodies	NC - R2	Amend	the activity status when compliance is not achieved is too restrictive.	Alternative relief, amend status when compliance is not achieved to controlled.
Department of Conservation (S602)	S602.108	Natural Character and Margins of Waterbodies	NC - R2	Oppose	Oppose Rule NC-R2 and amend it as a number of these activities can all have adverse effects on the environment that should be assessed through a resource consent application so appropriate conditions can be imposed if required, and the application can be declined if adverse effects are significant and/or the application is contrary to the provisions of the statutory documents.	Amend: Activity Status Permitted Where the buildings and structures are: <del>Network utilities; Temporary whitebait stands; Environmental monitoring facilities; Parks facilities and parks furniture within an Open Space and Recreation Zone; Natural hazard mitigation structures constructed by a statutory agency or their nominated contractor; or Renewable electricity generation facilities where these have a functional need to locate within the riparian margin; or Stormwater discharge structures and water supply intake structures constructed in accordance with NZS 4404 Code of Practice for Land Development and Subdivision Infrastructure.</del> Advice Note: Rules in other Overlay Chapters particularly Historic Heritage, Sites and Areas of Significance to Māori, Natural Hazards and Natural Features and Landscapes may also apply in these locations. Activity status where compliance not achieved: Discretionary

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Grey District Council (S608)	S608.066	Natural Character and Margins of Waterbodies	NC - R2	Amend	Landowners should have the right to protect their own land from natural hazards	Amend Condition E to remove " <del>constructed by a statutory agency or their nominated contractor</del> " Condition E to now read "Natural hazard mitigation structures; or"
Grey District Council (S608)	S608.615	Natural Character and Margins of Waterbodies	NC - R2	Oppose in part	The definition of "natural hazard mitigation structure" includes provision for the associated re-contouring of land and obviously you could not construct a structure without undertaking earthworks in the margin. The restrictions in NC-R1 render this rule unusable.	Amend this chapter accordingly. Concerns over the overlap between this chapter and the requirements of the WCRC. These are regional matters and are an unnecessary double up with resource consent requirements under the RLWP.
Westpower Limited (S547)	S547.330	Natural Character and Margins of Waterbodies	NC - R3	Support	Is an appropriate rule.	Retain
Westpower Limited (S547)	S547.331	Natural Character and Margins of Waterbodies	NC - R3	Amend	Activity rule as submitted above.	Amend heading: Indigenous ... Permitted <b>or Controlled</b> Activity Rules.
Buller Conservation Group (S552)	S552.101	Natural Character and Margins of Waterbodies	NC - R3	Amend	Needs to say have a functional need to be located in the riparian margin.	<b>have a functional need to be located in the riparian margin.</b>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.517	Natural Character and Margins of Waterbodies	NC - R3	Amend	It is not a more lenient standard than the rules in the ECO or EW chapter	Include a non-complying rule for activities in riparian margins likely to cause significant adverse effects.
William McLaughlin (S567)	S567.218	Natural Character and Margins of Waterbodies	NC - R3	Amend	R3 #2	Retain as notified with numbering error corrected.
WMS Group (HQ) Limited and WMS	S599.072	Natural Character and	NC - R3	Amend	Not considered necessary, because other provisions already adequately provide for	Amend NC - R3 as follows: Indigenous Vegetation Clearance and Earthworks <b>excluding minerals extraction,</b>

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Land Co. Limited (S599)		Margins of Waterbodies			these activities to be appropriately assessed without adding another rule.	<b>exploration and prospecting activities</b> , not meeting the Permitted Activity Rules  Activity Status Discretionary Alternatively, amend the definition of earthworks to specifically exclude minerals extraction, exploration and prospecting activities so that these rules do not apply to these activities.
Birchfield Ross Mining Limited (S604)	S604.117	Natural Character and Margins of Waterbodies	NC - R3	Amend	Not considered necessary, because other provisions already adequately provide for these activities	Alternatively, amend the definition of earthworks to specifically exclude minerals extraction, exploration and prospecting activities so that these rules do not apply to these activities.
Grey District Council (S608)	S608.619	Natural Character and Margins of Waterbodies	Discretionary Activities	Support in part	Numbering needs to be fixed.	Numbering needs to be fixed.
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.374	Natural Character and Margins of Waterbodies	NC - R3	Support	We support this rule.	Retain rule.
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.375	Natural Character and Margins of Waterbodies	NC - R3	Support	We support this rule.	Retain rule.
Waka Kotahi NZ Transport Agency (S450)	S450.108	Natural Character and Margins of Waterbodies	NC - R3	Support in part	The rule is generally supported. However, clarification is sought on how a 'statutory agency' is defined. Note: There are two NC-R3 within this chapter. The numbering should be amended to delete repetition.	Provide clarity by providing a definition for 'statutory agency'.
TiGa Minerals and Metals Limited (S493)	S493.067	Natural Character and Margins of Waterbodies	NC - R3	Amend	Other provisions already adequately provide for these activities to be assessed.	Amend: Indigenous Vegetation Clearance and Earthworks <b>excluding minerals extraction, exploration and prospecting activities</b> , not meeting the Permitted Activity Rules Activity Status Discretionary Alternatively, amend the



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						definition of earthworks to specifically exclude minerals extraction, exploration and prospecting activities so that these rules do not apply to these activities.
Buller District Council (S538)	S538.225	Natural Character and Margins of Waterbodies	NC - R3	Oppose in part	For the same reasons as stated above, Council seeks the removal of the single performance standard which limits new hazard mitigation structure to statutory agencies or their nominated contractors.	Amend Rule 3 as follows:  1. <del>These are constructed by a Statutory Agency of their authorised contractor.</del>
Frida Inta (S553)	S553.101	Natural Character and Margins of Waterbodies	NC - R3	Amend	At the beginning or end of this rule it needs to say have a functional need to be located in the riparian margin.	<b>have a functional need to be located in the riparian margin.</b>
Chris & Jan Coll (S558)	S558.138	Natural Character and Margins of Waterbodies	NC - R3	Amend	This rule replicates NC - R2.	Delete point 1.
Chris & Jan Coll (S558)	S558.140	Natural Character and Margins of Waterbodies	NC - R3	Amend	R3 #2	Retain as notified with numbering error corrected.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.255	Natural Character and Margins of Waterbodies	NC - R3	Oppose	This rule doesn't include any standards to ensure that natural character is preserved. Consent should be required to ensure the Council can manage effects.	Delete, and amend to at least discretionary.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.256	Natural Character and Margins of Waterbodies	NC - R3	Amend	Support at least a discretionary consent requirement for all works in riparian margins, only insofar as: - this doesn't duplicate, or is more stringent than NESFM rules;	Retain at least a discretionary consent requirement for activities in riparian margins, but ensure that: The rules are not more lenient than the NESFM for natural wetlands The rules are not more lenient than the ECO or EW rules (as amended by our submission.
Chris J Coll Surveying Limited (S566)	S566.138	Natural Character and Margins of Waterbodies	NC - R3	Amend	This rule replicates NC - R2.	Delete point 1.

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Chris J Coll Surveying Limited (S566)	S566.140	Natural Character and Margins of Waterbodies	NC - R3	Amend	R3 #2	Retain as notified with numbering error corrected.
William McLaughlin (S567)	S567.216	Natural Character and Margins of Waterbodies	NC - R3	Amend	This rule replicates NC - R2.	Delete point 1.
Laura Coll McLaughlin (S574)	S574.138	Natural Character and Margins of Waterbodies	NC - R3	Amend	This rule replicates NC - R2.	Delete point 1.
Laura Coll McLaughlin (S574)	S574.140	Natural Character and Margins of Waterbodies	NC - R3	Amend	R3 #2	Retain as notified with numbering error corrected.
Birchfield Coal Mines Ltd (S601)	S601.053	Natural Character and Margins of Waterbodies	NC - R3	Amend	Other provisions already adequately provide for these activities	Amend NC - R3 as follows: Indigenous Vegetation Clearance and Earthworks <b>excluding minerals extraction, exploration and prospecting activities</b> , not meeting the Permitted Activity Rules Activity Status Discretionary Alternatively, amend the definition of earthworks to specifically exclude minerals extraction, exploration and prospecting activities so that these rules do not apply to these activities.
BRM Developments Limited (S603)	S603.037	Natural Character and Margins of Waterbodies	NC - R3	Amend	Other provisions already adequately provide for these activities to be appropriately assessed without adding another rule.	Amend NC - R3 as follows: Indigenous Vegetation Clearance and Earthworks <b>excluding minerals extraction, exploration and prospecting activities</b> , not meeting the Permitted Activity Rules Activity Status Discretionary Alternatively, amend the definition of earthworks to specifically exclude minerals extraction, exploration and prospecting activities so that these rules do not apply to these activities.

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Birchfield Ross Mining Limited (S604)	S604.047	Natural Character and Margins of Waterbodies	NC - R3	Amend	Earthworks definition does not exclude minerals extraction, exploration and prospecting activities.	Amend NC - R3 as follows: Indigenous Vegetation Clearance and Earthworks <b>excluding minerals extraction, exploration and prospecting activities</b> , not meeting the Permitted Activity Rules Activity Status Discretionary
Phoenix Minerals Limited (S606)	S606.038	Natural Character and Margins of Waterbodies	NC - R3	Amend	This rule would apply to minerals extraction, exploration and prospecting	Amend: Indigenous Vegetation Clearance and Earthworks <b>excluding mineral extraction, exploration and prospecting activities</b> , not meeting the Permitted Activity Rules Activity Status Discretionary Alternatively, amend the definition of earthworks to specifically exclude minerals extraction, exploration and prospecting activities so that these rules do not apply to these activities.
Whyte Gold Limited (S607)	S607.036	Natural Character and Margins of Waterbodies	NC - R3	Amend	Other provisions already adequately provide for these activities to be appropriately assessed without adding another rule.	Amend NC - R3 as follows: Indigenous Vegetation Clearance and Earthworks <b>excluding minerals extraction, exploration and prospecting activities, ...</b>
Grey District Council (S608)	S608.067	Natural Character and Margins of Waterbodies	NC - R3	Amend	Landowners should have the right to protect their own land from natural hazards	Add " <b>Activity status where compliance is not achieved: Controlled</b> "
Grey District Council (S608)	S608.068	Natural Character and Margins of Waterbodies	NC - R3	Amend	The numbering of existing rules is required to be amended	Re-number in line with addition of new Rule.
Grey District Council (S608)	S608.616	Natural Character and Margins of Waterbodies	NC - R3	Oppose in part	The definition of "natural hazard mitigation structure" includes provision for the associated re-contouring of land and obviously you could not construct a structure without undertaking earthworks in the margin. The restrictions in NC-R1 render this rule useless.	Amend this chapter accordingly. Concerns over the overlap between this chapter and the requirements of the WCRC. These are regional matters and are an unnecessary double up with resource consent requirements under the RLWP.

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Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.376	Natural Character and Margins of Waterbodies	NC - R4	Support	We support this rule.	Retain rule.
Westpower Limited (S547)	S547.332	Natural Character and Margins of Waterbodies	NC - R4	Amend	Would need amendment to provide for a controlled activity rule as submitted above.	Amend heading: Indigenous ... Permitted <b>or Controlled</b> Activity Rules.
Chris & Jan Coll (S558)	S558.141	Natural Character and Margins of Waterbodies	NC - R4	Support		Retain
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.257	Natural Character and Margins of Waterbodies	NC - R4	Amend	Support at least a discretionary consent requirement for all works in riparian margins, only insofar as: - this doesn't duplicate, or is more stringent than NESFM rules;	Retain at least a discretionary consent requirement for activities in riparian margins, but ensure that: The rules are not more lenient than the NESFM for natural wetlands The rules are not more lenient than the ECO or EW rules (as amended by our submission.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.518	Natural Character and Margins of Waterbodies	NC - R4	Amend	It is not a more lenient standard than the rules in the ECO or EW chapter	Include a non-complying rule for activities in riparian margins likely to cause significant adverse effects.
Chris J Coll Surveying Limited (S566)	S566.141	Natural Character and Margins of Waterbodies	NC - R4	Support		Retain
William McLaughlin (S567)	S567.219	Natural Character and Margins of Waterbodies	NC - R4	Support		Retain
Laura Coll McLaughlin (S574)	S574.141	Natural Character and Margins of Waterbodies	NC - R4	Support		Retain

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Grey District Council (S608)	S608.069	Natural Character and Margins of Waterbodies	NC - R4	Amend	The numbering of existing rules is required to be amended	Re-number in line with addition of new Rule.
Grey District Council (S608)	S608.617	Natural Character and Margins of Waterbodies	NC - R4	Support in part	Numbering needs to be fixed.	Numbering needs to be fixed.
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.377	Natural Character and Margins of Waterbodies	NC - R5	Support	We support this rule.	Retain rule.
Buller District Council (S538)	S538.227	Natural Character and Margins of Waterbodies	NC - R5	Oppose	Council seeks that all new natural hazard mitigation structures are permitted with no performance standards and as a consequence, Rule 5 should be removed.	Delete Rule 5.
Westpower Limited (S547)	S547.333	Natural Character and Margins of Waterbodies	NC - R5	Amend	Would need amendment to provide for a controlled activity rule as submitted above.	Amend heading: Indigenous ... Permitted <b>or Controlled</b> Activity Rules.
Chris & Jan Coll (S558)	S558.143	Natural Character and Margins of Waterbodies	NC - R5	Support	do not support this activity being a Discretionary Activity.	Amend activity status to permitted, or Controlled Activity.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.258	Natural Character and Margins of Waterbodies	NC - R5	Amend	Support at least a discretionary consent requirement for all works in riparian margins, only insofar as: - this doesn't duplicate, or is more stringent than NESFM rules;	Retain at least a discretionary consent requirement for activities in riparian margins, but ensure that: The rules are not more lenient than the NESFM for natural wetlands The rules are not more lenient than the ECO or EW rules (as amended by our submission.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.519	Natural Character and Margins of Waterbodies	NC - R5	Amend	It is not a more lenient standard than the rules in the ECO or EW chapter	Include a non-complying rule for activities in riparian margins likely to cause significant adverse effects.

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Chris J Coll Surveying Limited (S566)	S566.143	Natural Character and Margins of Waterbodies	NC - R5	Support	do not support this activity being a Discretionary Activity.	Amend activity status to permitted, or Controlled Activity.
William McLaughlin (S567)	S567.220	Natural Character and Margins of Waterbodies	NC - R5	Support	do not support this activity being a Discretionary Activity.	Amend activity status to permitted, or Controlled Activity.
Laura Coll McLaughlin (S574)	S574.143	Natural Character and Margins of Waterbodies	NC - R5	Support	do not support this activity being a Discretionary Activity.	Amend activity status to permitted, or Controlled Activity.
Department of Conservation (S602)	S602.111	Natural Character and Margins of Waterbodies	NC - R5	Oppose	Delete Rule NC - R5 as a consequential amendment to DOCs submission on NC - R3 above.	Delete Rule NC-R5 in its entirety.
Grey District Council (S608)	S608.070	Natural Character and Margins of Waterbodies	NC - R5	Amend	The numbering of existing rules is required to be amended	Re-number in line with addition of new Rule.
Grey District Council (S608)	S608.618	Natural Character and Margins of Waterbodies	NC - R5	Support in part	Numbering needs to be fixed.	Numbering needs to be fixed.
Department of Conservation (S602)	S602.056	Historic Heritage	Other relevant Te Tai o Poutini Plan provisions	Neutral	DOC is neutral as these do not affect priority conservation values, biodiversity values, or DOC's interests.	NA
Chris & Jan Coll (S558)	S558.125	Natural Features and Landscapes	Controlled Activities	Support		Retain
Chris J Coll Surveying Limited (S566)	S566.125	Natural Features and Landscapes	Controlled Activities	Support		Retain
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.214	Ecosystems and Indigenous Biodiversity	Note:	Amend	The relationship between the maps and Schedule Four should be clarified.	Add a note to the effect that Schedule Four SNAs are spatially identified on the Planning maps under the Significant Natural Area overlay.

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Julie MacDonald (S114)	S114.001	Sites and Areas of Significance to Māori	SASM 68	Amend	No evidence of SASM. LIM report and property value affected. Other neighboring properties have been removed.	Eastern border area of sasm68 to be moved to the Iwi suggested position.
Buller District Council (S538)	S538.175	Notable Trees	Notable Trees	Support	Council supports the objectives, policies and rules for Notable Trees.	Retain as notified.
Manawa Energy Limited (Manawa Energy) (S438)	S438.020	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity	Not Stated	The terms 'indigenous biodiversity/ biodiversity' are used throughout the pTTPP, however a definition of this term is not included. Manawa considers that the inclusion of a definition will provide certainty for Plan users, and will assist in the effective administration of the Plan. It is appropriate to use the definition from the NPS-IB for consistency.	Add a new definition of the term 'indigenous biodiversity / biodiversity' as follows: <b>indigenous biodiversity / biodiversity: means the living organisms that occur naturally in New Zealand, and the ecological complexes of which they are part, including all forms of indigenous flora, fauna, and fungi, and their habitats.</b>
Frida Inta (S553)	S553.057	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity	Amend	The RMA, s31(b), (iii) version of natural character needs to be defined in ECO.	Add explanation consistent with S31(b)(iii) or the RMA <b>the control of any actual or potential effects of the use, development, or protection of land, including for the purpose of the maintenance of indigenous biological diversity</b>
Transpower New Zealand Limited (S299)	S299.079	Natural Features and Landscapes	Natural Features and Landscapes	Support in part	As currently drafted, the NFL chapter would apply to the National Grid and while Transpower is not necessarily opposed to this approach, it does seek clarification as to the relationship to the Energy Chapter, particularly in light of the sought National Grid specific policies within the ENG chapter which adopts a "seek to avoid" approach for the National Grid. To clarify the relationship, Transpower recommend a note to the recommended policy ENG-P8 that other policies in the plan do not apply. Should this not be accepted, Transpower seeks specific policy recognition within the NFL	Clarify the relationship between activities within the Energy Chapter and those within the Natural Features and Landscapes Chapter.

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					chapter. The discretionary status within Rule NFL-R14 and R15 is supported.	
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.229	Historic Heritage	Overview	Support	Te Mana Ora supports the protection of historic heritage of the West Coast/ Te Tai o Poutini. Engagement with cultural heritage promotes community wellbeing, and these shared spaces support community belonging and identity. Protecting and preserving heritage locations and sites is important, however, it is also important to note that some heritage sites hold different meaning for different groups. For example, heritage sites that symbolise a colonial power can have a damaging and disempowering impact on those who were colonised. Te Mana Ora endorses the objectives of the Sites and Areas of Significance for Māori alongside the Historic Heritage Objectives.	
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.255	Notable Trees	Overview	Support	Te Mana Ora strongly supports the Notable Tree Objectives and Policies. Trees, especially old trees, are similar to cultural and heritage sites, in that they are symbolic of a sense of place, connection, and identifying features of a place. Additionally, access to trees and green spaces has significant impact on a community's well-being, their behaviours, and relationship with nature. A recent study that explored tree cover and the impact on community, showed that residents living in areas with greater tree cover were much more likely to spend time in public green spaces.	
Te Mana Ora (Community and Public Health) of the	S190.273	Sites and Areas of Significance to Māori	Overview	Support	We support the objectives and policies regarding Sites and Areas of Significance to Māori. Māori wellbeing and health is embedded within the geography of the	



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NPHS/ Te Whatu Ora (S190)					whenua, the ecosystems and interactions between people and their environment. Therefore, it is important that protection is given to the environments and areas that are of significance to Māori. We strongly support this.	
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.311	Ecosystems and Indigenous Biodiversity	Overview	Support	Te Mana Ora largely supports the Ecosystems and Indigenous Biodiversity Objectives and Policies, with some recommended amendments. Protecting ecosystems and biodiversity supports environmental health and human health. Biodiversity supports human and societal needs, including food and nutrition security, energy, and freshwater, which together underpin good health. It also supports leisure activities that contribute to overall wellbeing. A recent review of biodiversity and human health highlighted that the natural environment enhances human wellbeing and health including through improving and supporting mental health, and reducing all-cause cancer, respiratory, and cardiovascular mortality. Additionally, green spaces have been shown to have a significant positive impact on prenatal and child development, and are also associated with reduced rates of obesity and allergies.	
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.337	Natural Features and Landscapes	Overview	Support	Te Mana Ora largely supports the objective and policies in this section. We support protection of the natural landscape and the outstanding natural features of the West Coast/ Te Tai o Poutini. The natural environment is a critical determinant of human wellbeing and health.	

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Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.361	Public Access	Overview	Support	Te Mana Ora endorses the importance of public access to and along coastal marine areas, lakes, and rivers. Well designed and maintained public access to waterbodies will support residents to engage with those areas for leisure and recreation which enhances their overall health and wellbeing.	
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.363	Natural Character and Margins of Waterbodies	Overview	Support	Te Mana Ora largely supports the objectives and policies in this section. We support the protection of the ecological, recreational, natural character amenity and cultural values of rivers, lakes and wetlands, as being part of a flourishing natural environment nourishes physical and emotional wellbeing. We endorse the need to value and protect the natural character and margins of waterbodies to support the wellbeing and health of residents of the West Coast/ Te Tai o Poutini. We recommend some amendments to the objectives to ensure the strong protection of freshwater ecosystems and freshwater quality for leisure and recreation activities, as well as for mahinga kai and activities important to Poutini Ngāi Tahu.	
Manawa Energy Limited (Manawa Energy) (S438)	S438.074	Ecosystems and Indigenous Biodiversity	Overview	Support in part	In general, Manawa has significant concerns with the approach taken in this chapter to identification and protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna as required under section 6(c) of the Act. The proposed approach relies heavily on applicants to provide information on areas of significant indigenous vegetation and significant habitats of indigenous fauna through any resource consent applications and this is	Reconsider, review and amend the approach to and all provisions relating to identification of significant natural areas, to, at least, take into account the exposure draft of the NPS- Indigenous Biodiversity (or the gazetted version if that comes into effect before the pTTPP becomes operative).

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					<p>generally the primary tool for identification of these areas. This is not considered to be a robust approach and it is considered unreasonable to put the cost of this process on to applicants alone.</p> <p>This approach means that all applicants will face considerable uncertainty in identifying consenting needs and may face unseen and unexpected hurdles in obtaining consents. It is an unreasonable derogation of the Council's responsibilities to recognise and provide for matters of national importance set out in the Act.</p> <p>While Manawa supports the need to protect significant biodiversity values, it is considered unreasonable to not specify these in the District Plan for all parties to see and to understand the impacts of. Manawa opposes the current approach and strongly recommends that this be reconsidered. It considers that a comprehensive and consistent investigation into significant natural areas, through a transparent and robust process, needs to be undertaken before any policy or provisions are included in the TTPP. It also notes that the National Policy Statement on Indigenous Biodiversity is due to be gazetted in late 2022, and that this may require amendments to the pTTPP to ensure consistency with a higher level policy document.</p>	
Manawa Energy Limited (Manawa Energy) (S438)	S438.084	Natural Features and Landscapes	Overview	Amend	Manawa acknowledges the protection afforded to outstanding natural features and landscapes (ONFL) under the provisions of the Resource Management	Amend the second paragraph of the Overview as follows: ... These areas may also include <del>critical</del> <b>regionally significant</b> infrastructure, renewable

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					Act 1991. These areas cover very large tracts of the West Coast and impact on large areas of private land (as well as the very large areas of public conservation estate). In some cases, parts of these ONFL areas contain significant areas of modification or large existing structures and facilities, including state highways, transmission lines, and hydroelectric power schemes. Manawa seeks that the pTTPP continues to acknowledge this this modification and existing use, particularly in the context of existing regionally significant infrastructure, Renewable Electricity Generation and other elements of the built environment. Manawa supports the explicit recognition of renewable electricity generation activities within Outstanding Natural Features and Outstanding Natural Landscapes (noting further comments below). To ensure consistency with other submission points it is requested that the term 'critical infrastructure' is replaced with 'regionally significant infrastructure'.	electricity generation activities, and other elements of the built environment and have varying degrees of modification.
Waka Kotahi NZ Transport Agency (S450)	S450.109	Natural Character and Margins of Waterbodies	Overview	Support	The overview is supported as it recognises the importance of providing good connectivity and integration which incorporates multi-modal transport opportunities.	Retain as proposed.
Frida Inta (S553)	S553.094	Natural Character and Margins of Waterbodies	Overview	Amend	The introduction needs to refer users of the Plan to the Land and Water Plan rules on riparian margins.	Insert at start of Overview: <b>Natural Character and the margins of waterbodies require protection as a matter of national importance under Section 6(a) of the RMA.</b>
Chris & Jan Coll (S558)	S558.128	Public Access	Overview	Support		Retain

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Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.194	Ecosystems and Indigenous Biodiversity	Overview	Oppose	It is not clear why this statement is only included in the ECO chapter overview and not the overview of other chapters.	Delete this statement.
Chris J Coll Surveying Limited (S566)	S566.128	Public Access	Overview	Support		Retain
Department of Conservation (S602)	S602.063	Ecosystems and Indigenous Biodiversity	Overview	Oppose	The overview requires amending to not only recognise species indigenous to New Zealand, but to also recognise flora and fauna endemic to the west coast and therefore not found anywhere else, threatened ecosystem types, and ecological connectivity.	<p>Amend:  ...The West Coast/Te Tai o Poutini contains a significant amount of intact natural diversity by comparison with other parts of New Zealand/Aotearoa me Te Waipounamu. Continuous tracts of lowland and coastal forests and freshwater as well as coastal wetlands cover large areas. In many places indigenous ecosystems and habitats extend unbroken from the mountains to the sea. <b>Approximately</b> 84% of the land area is under the management of the Department of Conservation. In total an estimated 90% of the West Coast/Te Tai o Poutini is covered in indigenous vegetation - compared with 24% nationally.</p> <p>While the West Coast/Te Tai o Poutini is fortunate to have a wide range of diverse and intact ecosystems and vegetation types, <b>they occur primarily in the uplands, and</b> there are some ecosystems and vegetation types not well represented in the protected areas network. These are generally ecosystems found in the lowland areas of the West Coast/Te Tai o Poutini, <b>and include threatened ecosystems such as coastal turf and wetlands, and vegetation types such as coastal forest and forests on alluvial terraces.</b> Alongside this, parts of the West Coast/Te Tai o Poutini include the last habitats or strongholds of some native species threatened with extinction. <b>The</b></p>

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						<p><b>benefits of ecological connectivity from the mountains to the sea on the West Coast/Te Tai o Poutini are shared by all.....</b>In the Grey District, an evaluation process has been underway for a number of years, and this has enabled 37 Significant Natural Areas to be identified within the Grey District. The list of these Significant Natural Areas can be found in Schedule Four and they are also shown on the maps.</p> <p>In the Buller and Westland Districts, where Significant Natural Areas have not yet been mapped, <b>the mapping of Significant Natural Areas will be undertaken and completed by June 2027.</b>;</p> <p>Te Tai o Poutini Plan has general vegetation clearance rules, with an <del>expectation</del> <b>requirement</b> that an assessment against the regionally consistent significance criteria will be undertaken at the time of any resource consent <b>or to confirm whether or not the area proposed to be cleared is not significant before permitted clearance occurs. These rules apply in addition to the rules that apply to the Schedule 4 Significant Natural Areas...</b></p> <p>...Indigenous vegetation clearance <del>in the Coastal Environment</del> or adjacent to waterbodies Where indigenous vegetation clearance is proposed within riparian margins next to rivers, lakes and wetlands refer to the Natural Character and Margins of Waterbodies chapter of the Plan for <del>the</del> <b>additional</b> Rules around this clearance....</p>
Department of Conservation (S602)	S602.083	Ecosystems and Indigenous Biodiversity	Overview	Neutral	DOC is neutral as these do not affect priority conservation values, biodiversity values, or DOC's interests.	NA

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Karamea Lime Company (S614)	S614.059	Public Access	Overview	Support		Retain
Chris & Jan Coll (S558)	S558.126	Natural Features and Landscapes	Restricted Discretionary Activities	Support		Retain
Chris J Coll Surveying Limited (S566)	S566.126	Natural Features and Landscapes	Restricted Discretionary Activities	Support		Retain
Chris & Jan Coll (S558)	S558.100	Ecosystems and Indigenous Biodiversity	Permitted Activities	Amend	We believe this is too restrictive.	Amend to be more enabling of development.
Chris & Jan Coll (S558)	S558.102	Ecosystems and Indigenous Biodiversity	Permitted Activities	Amend	that provision is made for low-level clearance for building sites.	Amend wording to provide for building sites.
Chris J Coll Surveying Limited (S566)	S566.100	Ecosystems and Indigenous Biodiversity	Permitted Activities	Amend	We believe this is too restrictive.	Amend to be more enabling of development.
Chris J Coll Surveying Limited (S566)	S566.102	Ecosystems and Indigenous Biodiversity	Permitted Activities	Amend	that provision is made for low-level clearance for building sites.	Amend wording to provide for building sites.
Buller District Council (S538)	S538.226	Natural Character and Margins of Waterbodies	Discretionary Activities	Support	It is noted that there are two NC-R3 rules, otherwise the second Rule 3 and Rule 4 are supported.	Retain as notified with correction to the numbering.
Chris & Jan Coll (S558)	S558.127	Natural Features and Landscapes	Discretionary Activities	Support		Retain
Chris J Coll Surveying Limited (S566)	S566.127	Natural Features and Landscapes	Discretionary Activities	Support		Retain