

Summary of Submissions

Submitter Names: E - F

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.ttpp.nz

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Elley Group Itd (S164)	S164.001	General Rural Zone	GRUZ - R3	Oppose	The requirement for a minimum size allotment of 4ha is unworkable, unnecessary, and based on incorrect ideals. It is neither appropriate, nor advisable in a geographically and low-density populated area like the West Coast. There is very little desire for 4 or 10Ha lots as they are not large enough to be productive but too large to maintain for most family units. We already have a predominance of non-productive coastal land, ideally suited to establish low density, easily maintainable, rural communities, which should not be seen as detrimental in a post COVID world.	Remove minimum lot size requirements for residential density in the General Rural Zone. Instead limit the number of minimum sizeallotments, in any nominated area, i.e. a maximum concentration ofhabitable lots to say 15% of an accumulative 10ha area in the generalrural zone and 2 per ha in highly productive land areas. This wouldachieve a far better outcome, while maintaining the rural character weactually have.
Elley Group Itd (S164)	S164.002	Natural Hazards	All Natural Hazard Overlays	Amend	The inclusion of a Tsunami Zone appears to be more based on the feeling we should have one, than the actual necessity This whole tsunami zone needs to be removed and replaced with an acknowledgement of inherent but extremely unlikely natural events which may occur at an indeterminable time.	Remove the tsunami hazard zone and associated provisions.
Elley Group Itd (S164)	S164.003	Natural Hazards	All Natural Hazard Overlays	Oppose	The inclusion of many of the natural hazard zones in their current suggested state, suggests a gross over-reaction to what is, at most, a potential worst-cased based scenario, with very little actual occurrence of most possible situations.	The hazards need to be managed and not based on a false sense of total risk reduction - there is no such thing. Put some realism back into the planning sector - Plan for real and measurable risks and

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					The proposed restrictions are draconian, in relation to actual proven risk and ignore the time and investment of the exisitng ratepayers, all of which can be destroyed at the stroke of a risk-averse planner's pen.	leave the rest to nature.
Ellis Mining Ltd (S146)	S146.001	Planning Maps and Overlays	Mineral Extraction Zone	Amend	The extent of proposed 'lanthe forest mineral extraction zone' currently does not encompass the entirety of mining permit 54079. The Northern area of MP54079 beyond the extent of proposed mineral extraction zone is strategically important for the establishment of mine infrastructure as well as being significant for mineral values.	The extent of 'lanthe forest mineral extraction area' (Westland Mapbook Grid Reference, sheet 80) to be increased to include the entirety of mining permit 54079.
Emilie Schmitthaeusler (S57)	S57.001	Planning Maps and Overlays	Coastal Environment	Oppose	We want to have a revaluation of the proposed natural significance on our land. We oppose the decision of the council regarding the classification of a part of our land as Natural significance and environemental values for the following reasons:	We want to have a revaluation regarding the Natural significance (High Coastal Natural Character) of our land - 4456A Karamea Highway, Karamea. We want to have the area that contains Eucalyptus trees removed from the High Natural Character Overlay.
					 This part of the land includes Eucalyptus trees (wich we use for our fire wood) and gorse bushes; emphasis is on the gorse as that demonstrates good drainage. This part of the land contain one of our main drains (between us and our neighbour) wich need to be maintained every year by machinery to avoid flooding of our property. This part of the land does not contain any natural significance 	
Emi Schroder (S369)	S369.001	SCHED7 - SCHEDULE OF HIGH	NCA33	Oppose	I oppose the schedule 7 listing for the terrace area South of Chesterfield Road to North of the Waimea Creek. I do not	Remove the High Natural Character Overlay HNC33 for the terrace area South of Chesterfield Road to North of the

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
		COASTAL NATURAL CHARACTER			believe this area warrants a designation of High on the 5 point "Natural Character" scale and want Council to remove the High Natural Character overlay. This terrace and the seaward coastal environs have been modifed, the fact the natural character scales do not appear to be clearly defined in either the RMA or NZ Coastal Policy Statement, the impacts on current and future owners of freehold rural land within this overlay.	Waimea Creek.
Emi Schroder (S369)	S369.002	Planning Maps and Overlays	Coastal Environment	Oppose	I want the Coastal Environment boundaries amended for our property and realigned with the terrace edge. The proposed overlay currently covers more than 60% of my/ our property. Most of this area has no visual connection to the coastal environment and does not have the described characteristics of the coastal environment as listed in the NZCPS.	Remove the Coastal Environment Overlay from our property and back to the terrace edge (Chesterfield Terraces area).
Emi Schroder (S369)	S369.003	Ecosystems and Indigenous Biodiversity	ECO - R1	Oppose	ECO Rules 1 and 2 need amendment and clarification regarding permittedactivities 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.
Emi Schroder (S369)	\$369.004	Ecosystems and Indigenous Biodiversity	ECO - R2	Oppose	ECO Rules 1 and 2 need amendment and clarification regarding permittedactivities 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.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Emi Schroder (S369)	\$369.005	Planning Maps and Overlays	High Natural Character	Oppose	I oppose the mapping of the terrace area South of Chesterfield Road to North of the Waimea Creek. I do not believe this area warrants a designation of High on the 5 point "Natural Character" scale and want Council to remove the High Natural Character overlay. This terrace and the seaward coastal environs have been modifed, the fact the natural character scales do not appear to be clearly defined in either the RMA or NZ Coastal Policy Statement, the impacts on current and future owners of freehold rural land within this overlay	Remove the HCNC overlay from the terrace area South of Chesterfield Road to North of the Waimea Creek.
Erin Stagg (S314)	S314.001	Planning Maps and Overlays	Natural Hazards	Support	Re 4398a Haast- Jackson Bay Road - the site has subdivision consent and resource consent to construct a dwelling. We support its inclusion in the Coastal Severe Hazard Overlay	Retain 4398a in the Coastal Hazard Severe Overlay
Erin Stagg (S314)	S314.002	Natural Hazards	NHR44	Oppose	There are feasible options to mitigate the risks of natural hazards through design and location. Refer to the submission document for more detail on these	That new sensitive activities be a Discretionary Activity rather than Non- complying in the Coastal Hazard Severe Overlay
Erin Stagg (S314)	S314.003	Planning Maps and Overlays	Sites and Ares of Significance to Māori	Support	We submit that recognizing Manawhenua's historic and ongoing connection to this region and the values within it is important and gives effect to the principles of Te Tiriti o Waitangi.	Retain SASM 206 over property at 4398a Haast-Jackson Bay Road
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.
Erin Stagg (S314)	S314.005	Natural Hazards	NHP10	Amend	Are feasible options to mitigate risks through design and location.	That Policy NH - P10 be amended as follows Avoid development of sensitive activities within the Coastal Severe Hazard and Flood Severe Hazard overlays unless it

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						 The activity has an operational and functional need to locate within the hazard area; and/or That the activity incorporates mitigation of risk to life, property and the environment; and there is significant public or environmental benefit in doing so. The risk to adjacent properties, activities and people is not increased as a result of the activity proceeding
Erin Stagg (S314)	S314.006	Planning Maps and Overlays	Rezoning Requests	Amend		Provide for more area of Settlement zone around the Haast Township - refer to map attached to submission for suggested redoing locations
Erin Stagg (S314)	S314.007	Subdivision	SUB - R6	Amend	Allow for subdivision while protecting Haast airfield	Amend the rule so that future development next to the Haast Airfield should be undertaken sensitively including acoustic insulation and no objection covenants.
Evelyn Hewlett (S112)	S112.001	Planning Maps and Overlays	Rezoning Requests	Amend	I oppose the zoning of Barrytown Flats as a Mineral Extraction Zone. The tiny sandplain that is the Barrytown flats is a not suitable for large scale or multiple open cast mining extraction. Refer to submission for detailed reasons the zone is inappropriate.	Amend zoning of Barrytown flats from Mineral extraction to General Rural and Rural Lifestyle Zone
Federated Farmers of New Zealand (S524)	S524.001	Introduction	Description of the Districts	Support	Recognises and describes the significance of agriculture/primary production to the West Coast.	Retain as notified.
Federated Farmers of New Zealand (S524)	S524.002	Introduction	Description of the Districts	Support	Recognises and describes the significance of agriculture/primary production to the West Coast.	Retain as notified.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Federated Farmers of New Zealand (S524)	S524.003	Interpretation	AGRICULTURAL, PASTORAL AND HORTICULTURAL ACTIVITIES	Oppose in part	While the definition is an accurate description of the activities associated with farming it is noted that the term rural production is used in many places throughout the Plan. This is confusing and there should be consistency and clarity in the usage of terms. WCFF seeks that the description in the definition for agricultural, pastoral, horticultural activities is retained but renamed 'rural production activities' and the term rural production used consistently throughout the plan. Separate rules are provided for intensive indoor primary production so the activity should be included as part of rural production activities.	Amend title of definition to 'rural production activities'. Amend references in plan to agricultural, pastoral, horticultural activities be amended to rural production activities. Delete exclusion of intensive indoor primary production from a)
Federated Farmers of New Zealand (S524)	S524.004	Interpretation	AREA OF SIGNIFICANT INDIGENOUS BIODIVERSITY	Not Stated	The definition applies only in relation to subdivision rules but the term significant indigenous biodiversity (SIB) is used in other sections of the Plan. Therefore the use of the defined term may be confusing. It is accepted that when undertaking a subdivision SIB will need to be identified and until such time as the council undertakes the necessary identification the identification in the definition applying for subdivision rules will be necessary.	Retain as notified. Include a definition for significant indigenous biodiversity
Federated Farmers of New Zealand (S524)	S524.005	Interpretation	CONSERVATION ACTIVITIES	Support in part	Conservation activities includes weed and pest control and this should be specifically included as part of conservation activities. It is important to farmers that such weed and pest control is undertaken.	Amend the second sentence of the definition of Conservation Activity: It includes ancillary activities which assist to enhance the public's appreciation and recreational enjoyment of the resource, including weed and pest control.
Federated Farmers of New Zealand (S524)	S524.006	Interpretation	CRITICAL INFRASTRUCTURE	Support in part	This definition needs improvement as it is not an exhaustive list and therefore the category needs explanation.	Amend as follows: means those necessary facilities, services, and installations which are critical or of significance to either the West Coast or

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						New Zealand. This may include but is not limited to rail network, state highways, special purpose roads, airports, wastewater, reticulated water and stormwater plants, defence facilities, telecommunications networks and electricity generation, transmission and distribution assets.
Federated Farmers of New Zealand (S524)	S524.007	Interpretation	EXISTING USE RIGHTS	Support in part	The definition of existing use rights is a summarised version of section 10 of the RMA. Existing use rights under the Act should not be limited by the definition in the Plan.	Either include the definition of existing use rights from section 10 of the RMA or remove the definition as a whole.
Federated Farmers of New Zealand (S524)	S524.008	Interpretation	FARM QUARRY	Support in part	On the whole, we support the definition, however it is not practical to require that a farm quarry can only serve farm activities that occur on the same site. The term site is defined in the National Planning Standards and the Plan as meaning as single record of title. Many farms will have a number of titles and it is not practical that a farm quarry use is limited to only the title on which it exists, rather than the full property or operation. Most farm quarries would serve rural production activities across the farm.	Amend the definition of farm quarry as follows: Means an open pit or excavation from which quantities of soil, stone, gravel or mineral is extracted for farming activities on the same site
Federated Farmers of New Zealand (S524)	S524.009	Interpretation	HERITAGE PROFESSIONAL	Oppose	These requirements are too onerous. The matter is best addressed in the rules for historic heritage. The Plan also refers to an assessment by a Heritage Architect in HH-R2. It is not clear whether this is the same as a heritage professional.	Delete definition of heritage professional Amend HH-R2 to refer to suitably qualified heritage professional
Federated Farmers of New Zealand (S524)	S524.010	Interpretation	AGRICULTURAL, PASTORAL AND HORTICULTURAL ACTIVITIES	Amend	WCFF seek amendments to the indigenous vegetation clearance rules based on the existence of improved pasture where some indigenous species may exist amongst the pasture.	Include a definition for improved pasture as follows: means an area of land where exotic pasture species have been deliberately sown or maintained for the purpose of

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					Therefore a definition for improved pasture is sought, suggest inclusion of the definition set out in the NPSFM.	pasture production, and species composition and growth has been modified and is being managed for livestock grazing
Federated Farmers of New Zealand (S524)	S524.011	Interpretation	INDIGENOUS VEGETATION CLEARANCE	Support in part	As drafted, the definition does not provide for grazing as it includes 'clearing or removal of indigenous vegetation by any means'. Farmers graze in and around areas of indigenous vegetation or indigenous vegetation may be scattered amongst pasture which may result in some of the indigenous vegetation being "cleared" pursuant to the current proposed definition. Indigenous vegetation and grazing can co-exist and is often considered good management practice in terms of fire protection and assist with regeneration.	Add additional clarification on improved pasture. means the clearing or removal of indigenous vegetation by any means, including cutting, crushing, cultivation, irrigation, chemical application, drainage, stop-banking, overplanting, or burning. It does not include the grazing of pasture or improved pasture species in that area of indigenous vegetation.
Federated Farmers of New Zealand (S524)	S524.012	Interpretation	LAWFULLY ESTABLISHED	Support in part	The definition for existing use rights refers to lawfully established activities, therefore it is confusing and also incorrect to then state that lawfully established activities includes activities permittedby an existing use right. The definition can be restructured to make it clear that lawfully established can be achieved by a number of ways, which are independent of each other.	Amend definition for lawfully established as follows: means activities provided for by one of the following: Permitted through a rule in a plan, or Through a resource consent, or In a national environmental standard; or By an existing use right (as provided for in Section 10 of the RMA) In the case of mineral extraction it also includes an activity permitted through a Coal Mining Licence issued under the Coal Mines Act (1979).
Federated Farmers of New Zealand (S524)	S524.013	Interpretation	MINOR RESIDENTIAL UNIT	Support	The notified definition follows the National Planning Standards.	Adopt as notified.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Federated Farmers of New Zealand (S524)	S524.014	Interpretation	RIVER	Support	The notified definition follows the National Planning Standards.	Adopt as notified.
Federated Farmers of New Zealand (S524)	S524.015	Interpretation	NOTIONAL BOUNDARY	Support	The notified definition follows the National Planning Standards.	Adopt as notified.
Federated Farmers of New Zealand (S524)	S524.016	Interpretation	REVERSE SENSITIVITY	Support	Support the inclusion of this definition. However it would be better to rely on the definition of 'lawfully established' in the Plan rather than using 'approved, existing or permitted activity'.	Amend definition of reverse sensitivity: Means the potential for a lawfully established activity to be compromised or constrained by the more recent establishment or alteration of another activity which may be sensitive to the actual, potential or perceived environmental effects generated by the lawfully established activity.
Federated Farmers of New Zealand (S524)	S524.017	Interpretation	RIPARIAN MARGIN	Support in part	Federated Farmers are concerned about how these distances are applied in the Natural Character provisions. If changes are not made to the rules, then Federated Farmers seeks that the distances are reduced to ensure that farming activities can continue	Changes are sought to the activities within these distances in the Natural Character rules. If changes are not made to the rules, then Federated Farmers seeks that the distances are reduced to ensure that farming activities can continue.
Federated Farmers of New Zealand (S524)	S524.018	Interpretation	RIVER	Support	The notified definition follows the National Planning Standards.	Adopt as notified.
Federated Farmers of New Zealand (S524)	S524.019	Interpretation	RURAL INDUSTRY	Support	The notified definition follows the National Planning Standards.	Adopt as notified.
Federated Farmers of New Zealand (S524)	S524.020	Interpretation	RURAL INDUSTRY	Support	The notified definition follows the National Planning Standards.	Adopt as notified.
Federated Farmers of New Zealand (S524)	S524.021	Interpretation	SIGNIFICANT NATURAL AREA	Support	This definition refers to the criteria set out in the WC RPS to identify what is an SNA. There is a definition for significant natural area in the RPS which is slightly different. The definition should be the same as the RPS. In particular an SNA is an area identified	Amend the definition of significant natural area as in the RPS: Means: an area of significant indigenous vegetation, and /or significant habitats of indigenous fauna which has been identified using the criteria listed in

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					using the criteria in the RPS AND included in maps in a regional or district plan as an SNA.	Appendix 1 or 2 of the RPS and included on maps in a regional or district plans as a SNA; or An area which although not included as a SNA in a regional or district plan nevertheless meets one or more of those criteria listed in Appendix 1 or 2 of the RPS.
Federated Farmers of New Zealand (S524)	S524.022	Interpretation	SENSITIVE ACTIVITY	Support	Identification of sensitive activities such as residential activities and educational facilities is appropriate.	Adopt as notified.
Federated Farmers of New Zealand (S524)	S524.023	Interpretation	SIGNIFICANT ELECTRICITY DISTRIBUTION LINE	Oppose in part	A significant electricity distribution line is any line greater than 33kV. This would include many lines within the West Coast. It would be better to focus on key SEDL's.	Amend to voltage of 66kV or greater,
Federated Farmers of New Zealand (S524)	S524.024	Interpretation	WATERBODY	Support	The notified definition follows the National Planning Standards.	Adopt as notified.
Federated Farmers of New Zealand (S524)	S524.025	Interpretation	WETLAND	Support	The notified definition follows the National Planning Standards.	Adopt as notified.
Federated Farmers of New Zealand (S524)	S524.026	Interpretation	FARM QUARRY	Amend	Quarrying is referred to in the rules and a definition is required to differentiate with farm quarry	Add definition for quarrying: means a location or area used for the permanent removal and extraction of aggregates (clay, silt, rock or sand). It includes the area of aggregate resource and surrounding land associated with the operation of a quarry and which is used for quarrying activities. This does not include a farm quarry.
Federated Farmers of New Zealand (S524)	S524.027	Rural Zones	GRUZ - PREC 5 - Highly Productive Land Precinct Policy	Amend	The plan refers to highly productive land but the term is not defined. The NPSHPL has now been released. A definition is sought consistent with the definition in the Draft NPSHPL. The plan also refers	Include a new definition for highly productive land: Until the regional policy statement contains maps identifying highly productive land in the West Coast, highly productive land is: LUC 1, 2, or 3 land which is zone general

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					to versatile soils. There should be consistency is usage of terms.	rural or rural production and is not identified for future urban development. Amend all uses of 'versatile soil' to 'highly productive land.'
Federated Farmers of New Zealand (S524)	S524.028	STRATEGIC DIRECTION	Agriculture Strategic Objectives	Support in part	Whilst these objectives do recognise the significance of agriculture to the West Coast, these could be reworded for readability and recognition. The overarching recognition should stand alone as an objective, rather than be included with support industries as is. There is no definition for versatile soils in the plan and it is considered that the term highly productive land should be used to be consistent with the recently released NPSHPL.	Replace with: AG- O1 The significance of agriculture to the WC community is recognised and provided for. AG-O2 The productive value of highly productive land and agricultural land is maintained for current and future agricultural and horticultural uses. AG-O3 Agricultural development and innovation is provided for including enabling the rural support industries and services to maintain agricultural viability Add a definition for highly productive land
Federated Farmers of New Zealand (S524)	S524.029	STRATEGIC DIRECTION	Connections and Resilience Strategic Objectives	Support	This suite of objectives recognises the connections and resilience that the WC needs and relies on during its adverse weather events.	Adopt as notified.
Federated Farmers of New Zealand (S524)	S524.030	STRATEGIC DIRECTION	NENV- O1	Support in part	NENV-O1 seeks to protect a range of features. To be consistent with s6 of the RMA the focus should be on 'outstanding' natural features and landscapes and 'significant' indigenous biodiversity Also, the protection is from 'inappropriate subdivision use and development' - not protection per se.	Amend NENV-O1: The natural features that contribute to the West Coast's character and identity and Poutini Ngai Tahu's cultural and spiritual values are recognised by preserving natural character, protecting outstanding natural features and landscapes and significant indigenous biodiversity from inappropriate subdivision use and development
Federated Farmers of New Zealand (S524)	S524.031	STRATEGIC DIRECTION	POU - P5	Support in part	WCFF supports this suite of objectives recognising the importance of the natural environment of Te Tai o Poutini, however existing activities within these	Reword NENV-O3: To recognise: The substantial contribution to the protection of natural environment values that is made by the existence of public

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					environments need to be recognised, just as infrastructure is in NENV-O3. Add c. there are existing lawfully established activities in the natural environment.	conservation land in protecting significant areas, habitats and features; The need for infrastructure to sometimes be located in significant areas; and There are existing lawfully established activities located in significant areas; and The need to support the ethic of stewardship and to consider the positive effects of the conservation estate in achieving the requirements of the RMA.
Federated Farmers of New Zealand (S524)	S524.032	STRATEGIC DIRECTION	POU - P10	Support in part	Agree with the sentiment of this policy, however it should be reworded as recognise rather than protect. Section 6 of the RMA requires recognition and provision for matters of national importance.	Reword as follows: Recognise Protect Poutini Ngai Tahu taonga and cultural sites, including sites and areas of significance to Maori identified in Schedule Three while ensuring Poutini Ngai Tahu's key role in decision making around their management.
Federated Farmers of New Zealand (S524)	S524.033	Energy	ENG - 03	Support in part	The focus on providing for energy activities should be that they are not compromised by adverse effects of incompatible subdivision and development - rather than a 'protection'.	Amend ENG-O3 To provide for the development, operation, maintenance and upgrade of energy activities and ensure that they are not compromised by the adverse effects of incompatible subdivision, use and development.
Federated Farmers of New Zealand (S524)	S524.034	Energy	ENG - O4	Support	A policy to recognise and provide for the National Grid is consistent with the NPS-ET.	Retain ENG-O4
Federated Farmers of New Zealand (S524)	S524.035	Energy	ENG - P3	Support in part	The focus on providing for energy activities should be that they are not compromised by adverse effects of incompatible subdivision and development - rather than a 'protection'.	Amend ENG-P3 Minimise reverse sensitivity effects from subdivision, use and development on energy activities and ensure that ensure that the ongoing operation, maintenance, upgrade or development is not compromised.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Federated Farmers of New Zealand (S524)	S524.036	Energy	ENG - P9	Support in part	The NPS-ET Policy 10 seeks that reverse sensitivity effects are avoided to the extent reasonably possible.	Amend ENG-P10 e) Avoid, to the extent reasonably possible potential for reverse sensitivity effects on the National Grid
Federated Farmers of New Zealand (S524)	S524.037	Energy	ENG - R6	Support in part	NZECP34:2001 provides the basis for provisions around significant electricity distribution lines which are any lines of 33kv or greater. The provisions in the plan should align with NZECP34 which vary according to voltage and span. The provisions in ENG-R6 set an arbitrary setback distance of 12metres which does not align with NZECP34:2001.	Amend ENG-R6 by deleting 4) and relying on clause 5) which applies the distances in NZECP34:2001.
Federated Farmers of New Zealand (S524)	S524.038	Energy	ENG - R19	Oppose in part	Activities in and around SETL should not be non-complying if the PA standards are not met. These should be Restricted Discretionary where the standards in NZECP34:2001 are not met.	Amend ENG-R19 by deleting significant Electricity Distribution Lines and include as a Restricted Discretionary activity.
Federated Farmers of New Zealand (S524)	S524.039	Hazardous Substances	HS - 01	Support	The approach to hazardous substances is supported, with a focus on major hazard facilities.	Retain HS-01
Federated Farmers of New Zealand (S524)	S524.040	Hazardous Substances	HS - P2	Support in part	Major hazard facilities is not defined and it needs to be clear what are considered to be such facilities. The Health and Safety at Work Major hazardous facilities Regulations 2016 provide a framework for assessing such facilities.	Include a definition for major hazard facilities: Any facility deemed a Major Hazardous Facility under the Health and Safety at Work Major Hazardous Facilities Regulations 2016
Federated Farmers of New Zealand (S524)	S524.041	HAZ - Hazards and Risks	NH - O1	Support in part	The West Coast is a very diverse landscape and environment, and we question whether it is possible to have a "regionally consistent" approach. We support the risk-based approach however our members advise that an approach in Hokitika will not be relevant down in Haast and therefore the approach should be risk based and be designed for that specific environment.	Reword NH-O1: A risk based approach for managing natural hazard risk is used for new subdivision, use and development.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Federated Farmers of New Zealand (S524)	S524.042	Natural Hazards	NHO3	Amend	There needs to be a requirement for new critical infrastructure with regard to design and its durability to ensure its durability in an event	Amend NH-O3 To only locate critical infrastructure within areas of significant natural hazard risk where there is no reasonable alternative, and to design infrastructure so as not to exacerbate natural hazard risk to people and property and is designed to maintain integrity and ongoing function during and after natural hazards
Federated Farmers of New Zealand (S524)	\$524.043	Natural Hazards	NHP7	Support	Policy NH-P7 provides for unoccupied structures and buildings within the Earthquake Hazard Overlay. Farms often have unoccupied buildings and structures that do not pose as high a risk as occupied buildings.	Retain NH-P7 as notified
Federated Farmers of New Zealand (S524)	S524.044	Natural Hazards	Natural Hazards	Not Stated	There should be provision for unoccupied farm buildings in natural hazard areas as these have a lower risk than occupied buildings	There should be provision for unoccupied farm buildings in natural hazard areas as these have a lower risk than occupied buildings
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, 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	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 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.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					HNZPT archaeologists processing Authorities. If an Authority is required then it is set out in legislation rather than a provision of this Plan.	
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.
Federated Farmers of New Zealand (S524)	S524.047	SCHED1B - SCHEDULE OF ARCHEOLOGI CAL SITES	SCHED1B - SCHEDULE OF ARCHEOLOGICAL SITES	Oppose	There are no rules associated with this Schedule. Further it is not a complete list of archaeological sites on the West Coast. As works associated with archaeological sites are managed pursuant to the HNZPTA this will only confuse a Plan user.	Remove this Schedule
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.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
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.
Federated Farmers of New Zealand (S524)	\$524.050	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.
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.
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.

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
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.
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).
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
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.
Federated Farmers of New Zealand (S524)	S524.058	SCHED4 - SCHEDULE OF SIGNIFICANT NATURAL AREAS	SCHED4 - SCHEDULE OF SIGNIFICANT NATURAL AREAS	Oppose	This schedule should contain all areas meeting the RPS criteria for SNA's. Not just those in Grey District. Because of this, there is uncertainty and additional costs imposed on landowners in Westland and Buller who wish to clear indigenous vegetation, especially where	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.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					needed for farm and pasture maintenance. Where Significant Natural Areas have not yet been mapped, 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. This means the onus and cost is on the landowner to carry out such an assessment which is inconsistent with the RPS which requires the Council's to do the assessment and subsequent mapping. As is, without the SNAs in all districts assessed and mapped, these provisions are not consistent with the RPS. The RPS states "It is intended that SNAs will be identified and mapped in the preparation of district and regional plans". The RMA requires Councils, when exercising its duties to recognise and provide for the protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna, as a matter of national importance. The rules as drafted currently apply beyond areas of SNA as per the criteria set in the RPS. The Draft NPS-IB provides for maintenance of improved pasture where it may affect an SNA. WCFF seeks a similar approach in the areas where identification of SNA's has not been undertaken.	
Federated Farmers of New Zealand (S524)	S524.059	Ecosystems and Indigenous Biodiversity	ECO- 02	Support	Providing for appropriate subdivision use and development within SNA's is supported.	Adopt as notified

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
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.
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
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.
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)
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 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 openended concept.	Amend policy as follows: Provide for Enable biodiversity offsets and compensation to manage residual adverse effects of an activity where: The goal of the biodiversity offsets is no net loss and, preferably, a net gain of biodiversity; The conservation outcomes of biodiversity offsets are measurable and positive; and The biodiversity offsets or compensation are in accordance with best practice, including but not limited to NZ Government

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						guidance on biodiversity offsetting.
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 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. Maintaining existing pasture is important to achieve the strategic direction for agriculture on the West Coast. 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	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 shelter purposes Amend ECO-R5 to: Controlled activity Indigenous vegetation clearance not meeting permitted or controlled activity standards Amend matters of discretion to Matters of control

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					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. ECO-R5 applies where the permitted or controlled activity standards are not met.	
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, drains and pasture maintenance.
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.
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
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
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.
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.
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.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Federated Farmers of New Zealand (S524)	S524.074	Natural Features and Landscapes	NFL - R8	Support	Retain as notified	Retain as notified
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, 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.	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 owners.
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.
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

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
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.
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
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
Federated Farmers of New Zealand (S524)	S524.081	Subdivision	SUB - P1	Support in part	Whilst subdivision should be consistent with the qualities listed, it should also provide for the same. For example, with regard to highly productive land. Changes are sought to address these matters.	d. Amend: Enable subdivision that creates allotments that: a. Are consistent with and provide for the purpose, character, and qualities of the applicable zone; Protects significant cultural, historical, natural and ecological features sites and areas identified on the planning maps and in the Schedules in the Plan; Recognises and protects areas of highly productive land; and
Federated Farmers of New Zealand (S524)	S524.082	Subdivision	SUB - P6	Support in part	Support a policy to prevent fragmentation in the rural zone. Subdivision should also avoid the potential for reverse sensitivity effects that can result.	Amend SUB-P6 g) That would create reverse sensitivity effects in the RURZ.
Federated Farmers of New Zealand (S524)	S524.083	Subdivision	SUB - P9	Not Stated	This policy should give effect to the provisions for requiring esplanade reserves in the RMA Protection of biodiversity values or of sites of significance to Maori etc are not within the purposes of Esplanade Reserves under section 229 of the RMA -	Amend Policy as follows: To require esplanade reserves or esplanade strips for allotments of less than 4 ha to enable public access, reduce natural hazard risk, and contribute to the protection of natural character and

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					so these clauses should be deleted. Where width greater than 20 metres is required, this should be with the consent of the subdividing landowner, as there is no mandatory requirement for taking an esplanade reserve or strip greater than 20 metres in width, and the excess land may have economic value for the landowner that should be taken into account. The location of the site being subdivided should weigh into consideration of waiving of the esplanade reserve requirement in this policy. If the site is isolated and there is no access to the esplanade reserve, it will be costly to maintain for weed and pest control, and maintenance of free flowing water bodies.	biodiversity values for the purposes stated in section 229 of the Resource Management Act 1991, except that the width of the esplanade reserve or strip may be varied from 20 metres or waived if: The natural values The protection of conservation values, or the enabling of public access, or the enabling of public recreational use that is compatible with conservation values, or reduction of natural hazard risk warrant a wider or narrower esplanade strip or esplanade reserve; or Topography, site location, or the siting of any building or other feature, renders the 20-metre width inadequate or excessive; or The protection of Sites and Areas of Significance to Māori or other taonga requires an esplanade reserve or esplanade strip of greater or lesser width than 20 metres; or The protection or enhancement of biodiversity values or water quality requires an esplanade reserve or esplanade strip of greater or lesser than 20 metres and there is an unconditional sale and purchase agreement with the subdividing landowner for the land where a greater than 20-metre width of esplanade reserve is required; or The land is within a natural hazard area of where there is an identified risk from one or more natural hazards (such as coastal erosion).
Federated Farmers of New Zealand (S524)	S524.084	Subdivision	SUB - R7/ECO - R4	Support	Must be consistent with ECO-R4	Ensure is consistent with ECO-R4

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Federated Farmers of New Zealand (S524)	S524.085	Subdivision	SUB - S1	Support in part	Support the minimum lot sizes for rural and rural lifestyle zone Rural Lifestyle Zone 1 hectare; h. General Rural Zone 4 hectares, except that it is 10 hectares in the Highly Productive Land Precinct; The minimum lot for subdivision for SIB in SUB-R7 should also be listed	Amend SUB-S1 h): Or 4000m2 in the GRUZ where contains area of significant indigenous biodiversity.
Federated Farmers of New Zealand (S524)	S524.086	Coastal Environment	CE - O1	Support	These objectives appear to be consistent with the NZCPS	Retain as notified.
Federated Farmers of New Zealand (S524)	S524.087	Coastal Environment	CE - P1	Support	This overlay must be identified and mapped	This overlay must be identified and mapped
Federated Farmers of New Zealand (S524)	S524.088	Coastal Environment	CE - P4	Support	This policy recognises and provides for existing primary production activities. However, the term primary production is not defined in the Plan, although the National Planning Standards definition would apply.	Retain as notified and include the definition for primary production activities from the National Planning Standards.
Federated Farmers of New Zealand (S524)	S524.089	Coastal Environment	CE - R1	Support	This recognises lawfully established structures within the Coastal Environment and when they require maintenance/repair.	Retain as notified.
Federated Farmers of New Zealand (S524)	S524.090	Coastal Environment	CE - R4	Not Stated	Building height needs to allow for hay sheds and farm structures that are tall to allow for farm equipment and storage.	Increase the building height to 10m, and 500m2
Federated Farmers of New Zealand (S524)	S524.091	Coastal Environment	CE - R7	Support	Support the provision for farm tracks and fences within High Coastal Natural Character Overlay	Retain as notified.
Federated Farmers of New Zealand (S524)	S524.092	Earthworks	EW - 01	Support	Captures intention for earthworks with avoiding/mitigating adverse effects	Retain as notified
Federated Farmers of New Zealand (S524)	S524.093	Earthworks	EW - P1	Support	These provide for the practical requirements of earthworks while also recognising the need to minimise any adverse effects	Retain as notified

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Federated Farmers of New Zealand (S524)	S524.094	Earthworks	EW - P4	Support in part	An objective to 'protect' critical infrastructure would be better focused on ensuring that critical infrastructure is not compromised from the adverse effects of earthworks.	Amend EW-P4 Ensure that critical infrastructure and natural hazard defences are not compromised by the adverse effects of earthworks.
Federated Farmers of New Zealand (S524)	\$524.095	Earthworks	EW - R3	Support	Agricultural activities are permitted in the GRUZ so earthworks ancillary to agricultural activities are provided for as a permitted activity as long as standards in EW-R1 are met. This approach is supported.	Retain as notified
Federated Farmers of New Zealand (S524)	S524.096	Light	LIGHT - O1	Support in part	Recognition of the need for artificial lighting for rural productive activities is supported. Adequate lighting is essential for health and safety purposes. A definition is sought for rural production activities so the term in the objective should be consistent.	Amend LIGHT-O1 as follows: Change 'rural productive activities' to 'rural production activities' Night-time work, rural production productive activities, recreation activities, sport, entertainment activities, transportation and public health and safety are enabled through artificial outdoor lighting
Federated Farmers of New Zealand (S524)	S524.097	Light	LIGHT - P1	Support in part	Primary sector activities require the use of artificial light for day-to-day operations. For instance, night light is required for dairy sheds where lights will likely be on before 7am, security (particularly around fuel storage), shearing sheds (when sheep are stored in sheds lights are left on overnight in wintering barns), and harvest and spraying (where machinery may be operating at any hour). Seasonal farming operations are not included in the definition of 'temporary activity' (enabled under LIGHT - P2), therefore enablement of agricultural operations is required under P1.	Amend LIGHT-P1: Provide for the use of artificial outdoor lighting that: f. Enables rural production activities.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Federated Farmers of New Zealand (S524)	S524.098	Light	Light Policies	Support in part	The reference in LIGHT-P2 to 'artificial outdoor lighting' requires a corresponding definition.	Include a definition for 'artificial outdoor lighting' as: Any electrically-powered exterior lighting that emits directly into the outdoor environment'
Federated Farmers of New Zealand (S524)	S524.099	Light	LIGHT - R4	Oppose	LIGHT-R4 sets a lux level for the rural zones of 10 lux 7am - 10pm and 2 lux 10pm - 7am as a permitted activity. This level is not practical from a farming perspective - a much higher lux level; is required for health and safety purposes, to waken the cows and security for farm workers. There is no analysis or explanation in the s32 Report to justify why these levels have been chosen. The standard is to be measured at the boundary of any adjoining site or the window closest to the light source. Where rural residential development has been allowed in the rural area this could preclude legally established rural production activities. Further, this does not achieve the outcome of proposed LIGHT - O1 which identifies that rural production activity is enabled through artificial lighting.	Amend LIGHT-R4 to exclude the RURZ
Federated Farmers of New Zealand (S524)	S524.100	Noise	NOISE - O2	Support in part	Recognising existing noise generating activities, including reverse sensitivity effects is important. However, the objective should refer to 'lawfully established activities' which is defined in the Plan. Noise sensitive activities are not defined in the Plan. It should be clear the type of activity that is considered to be noise sensitive.	Amend NOISE-O2 The function and operation of lawfully established activities that generate noise and community infrastructure are not compromised by adverse effects, including reverse sensitivity effects, from noise sensitive activities. Include a definition for noise sensitive activities: Means activities that may be affected by noise including residential activities, education facilities, visitor accommodation,

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						health facilities.
Federated Farmers of New Zealand (S524)	S524.101	Noise	NOISE - P2	Support in part	The rural area is not listed as being a higher noise environment, yet many rural dwellers complain about noise experienced in a rural location. Rural production activities are noise generating activities and the Rural zones should be recognised as areas where noise levels may be higher than anticipated by people who think it is a 'quiet' environment.	Amend NOISE-P2 to include GRUZ as a higher noise environment.
Federated Farmers of New Zealand (S524)	S524.102	Noise	NOISE - P4	Support in part	NOISE-P4 seeks to 'protect' the health and wellbeing of people and communities but if people are inappropriately located in a higher noise environment such level of protection may not be possible.	Amend NOISE-P4 to: Ensure noise effects generated by an activity are of a type, scale and level that are appropriate for the predominant role, function and character of the receiving environment and provide for protect the health and wellbeing of people and communities having regard to:
Federated Farmers of New Zealand (S524)	S524.103	Noise	NOISE - R6	Oppose in part	NOISE-R2 11) provides an exemption for rural production activities undertaken for a limited duration. This is supported. NOISE-R2-12 provides an exemption of aircraft for rural production purposes. This is supported. The reference in NOISE-R2 16) to 'audible bird scaring device' requires a corresponding definition.	Amend NOISE-R2 11) by replacing 'agricultural, horticulture and pastoral faming activities' with 'rural production activities'. Retain NOISE-R2 12) Include a definition for 'audible bird scaring device' as: 'Gas guns and avian distress alarms used for the purposes of disturbing or scaring birds'.
Federated Farmers of New Zealand (S524)	S524.104	Rural Zones	Rural Zones - Objectives and Policies	Support in part	Typo of 'levels' must be amended. On farm accommodation for workers is often provided in close proximity to other dwellings therefore separation distance from neighbours is not guaranteed, as implied by current wording.	Amend statement: Rural areas are also residential environments - characterised by a lower levels of built development. and greater separation distance from neighbours.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Federated Farmers of New Zealand (S524)	S524.105	Rural Zones	Rural Zones Objectives	Not Stated	There is no objective that enables rural production activities in the rural zones. This may be because the structure of the objectives and policies applies generically across all rural zones and not specific to the General Rural Zone. However, to be consistent with the Zone Framework Standard in the National Planning Standards there needs to be objective which clearly set out the expectations for each respective zone.	Amend RURZ-O1 or include as GRUZO1: The General Rural Zone provides for primary production activities and a range of activities that support primary production activities and other activities that require a rural location.
Federated Farmers of New Zealand (S524)	S524.106	Rural Zones	RURZ - 01	Oppose in part	As drafted this objective focuses more on the amenity and character of the zone than the activities that occur and contribute to those attributes. It also provides for 'a range of activities' whereas the National Planning Standards are quite specific about the type of activities that are appropriate in the rural zones.	Reword: The function, amenity and character values of the rural environment are maintained through providing for primary production activities and activities which support primary production or which require to be located in a rural environment and which are appropriately located in a rural zone.
Federated Farmers of New Zealand (S524)	S524.107	Rural Zones	RURZ - 02	Support in part	RURZ-O2 is related to the Rural Lifestyle zone and should reflect the expectation of that zone.	Amend RURZ-O2 or include as RLZ-O1: The Rural Lifestyle zone provides for low density rural lifestyle living while still enabling primary production to occur, while avoiding conflicts and reverse sensitivity effects with rural production activities
Federated Farmers of New Zealand (S524)	S524.108	Rural Zones	RURZ - 03	Support in part	Both RURZ-O3 and RURZ-O4 relate to the settlement zones. It would be more appropriate that these were included in the SETZ provisions.	Move RURZ-O3 and RURZ-O4 to SETZO1 and O2.
Federated Farmers of New Zealand (S524)	S524.109	Rural Zones	RURZ - P1	Oppose in part	The policy seeks to provide for a 'variety of activities' to occur within the RURZ. The National Planning Standards are quite specific about the type of activities that are appropriate in the rural zones and using broad open-ended terminology does not provide direction.	Amend RURZ-P1: Rural character will be maintained in the GRUZ and RLZ by: Buildings and structures having a bulk and location characteristic of rural environments and primary production activities

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						Maintaining privacy and rural outlook for residential buildings Ensuring activities are compatible with the existing development and surrounding area while recognising that primary production activities can generate noise, odour and dust Having appropriate setbacks from roads and adjacent primary production activities Locating activities sensitively in the environment to minimise adverse visual and cultural effects if sited on ridge lines or ancestral mountains.
Federated Farmers of New Zealand (S524)	S524.110	Rural Zones	RURZ - P2	Support in part	Both RURZ-P2 and P3 relate to settlements and would be more appropriately located in the SETZ zone.	Move RURZ-P2 and P3 to SETZ-P1 and P2.
Federated Farmers of New Zealand (S524)	S524.111	Rural Zones	RURZ - P5	Support in part	Recognition of highly productive land is supported. However this policy applies specifically to the GRUZ.	Move RURZ-P5 to GRUZ-P1
Federated Farmers of New Zealand (S524)	S524.112	Rural Zones	RURZ	Amend	There is no policy providing for rural industry which has a functional need to locate in the Rural zones. There is a rule for rural industry and there should be a policy that provides direction for the activity. Rural industry would include rural contractor depots, rural trucking depots, research centres, and rural supplies stores.	Include a policy for rural industry RURZ-PX Rural industry Recognise and provide for rural industry which support primary production and are an essential component of rural production on the West Coast.
5.1.4.15	0504.440		DUDZ DO		Rural industry is distinct from non-rural activities so RURZP6 is not appropriate for rural industry.	
Federated Farmers of New Zealand (S524)	S524.113	Rural Zones	RURZ - P6	Support	Appreciate that where an activity has a functional relationship with rural areas then it may be appropriate to locate that	Retain as notified in addition to new policy RURZ-PX above.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					activity in a rural zone, provided any adverse effects are managed and a new policy is introduced as above where an activity supports primary production.	
Federated Farmers of New Zealand (S524)	S524.114	Rural Zones	RURZ - P9	Support in part	Recognition of the visitor economy is needed but the location of tourism in the RURZ should not adversely affect rural production	Amend RURZ-P10 by adding and which do not adversely effect rural production activities
Federated Farmers of New Zealand (S524)	S524.115	Rural Zones	RURZ - P15	Support in part	The policy for reverse sensitivity is supported but 'existing rural uses and consented activities' would be better to refer to 'lawfully established activities' which is a defined term in the plan.	Amend RURZ-P15 by replacing 'existing rural uses and consented activities' with 'lawfully established activities'.
Federated Farmers of New Zealand (S524)	S524.116	Rural Zones	RURZ - P27	Support in part	It should be clear that Policy 26 applies to rural production uses while Policy 27 applies to non-rural production uses.	Amend RURZ-P27 Manage the location and operation of airfield and helicopter landing areas within the rural area for activities other than for primary production to provide for the amenity values of the surrounding rural area.
Federated Farmers of New Zealand (S524)	S524.117	Rural Zones	RURZ - P28	Support	Policy 28 provides for the use of aircraft for rural production. This is supported.	Retain RURZ-P28
Federated Farmers of New Zealand (S524)	S524.118	General Rural Zone	GRUZ - R1	Oppose	GRUZ-R1 combines rural production activities with building activities in the one rule. Other rules refer to the requirements of R1 as they relate to buildings. It would be better to have a specific rule for buildings and a specific rule providing for rural production activities.	Amend GRUZ-R1: Rural production activities Permitted Where: 1.Woodlots are not established within 10m of the boundary of an adjoining property unless that property is within plantation forestry and 40m from a residential activity. 2. Performance standards for beekeeping in the Westland District apply as follows: i) No bees may be kept on a property less that 600m2 net site area ii) Beehives must be placed with and obstruction in front of them or be elevated to enable bees to be 2.5m above ground level prior to crossing

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						the site boundary. Insert new GRUZ rule: Buildings Permitted activity Where: Include Clauses 1,2,3 and 5 from Notified GRUZ-R1 And Amend references to Rule GRUZ-R1 in other rules to ensure correct reference to new numbering.
Federated Farmers of New Zealand (S524)	S524.119	General Rural Zone	GRUZ - R3	Support in part	Primary production farms require multiple dwellings for staff accommodation often in close proximity to each other. Larger farms may have several individual minor residential units within close proximity.	Amend statement: There is no more than 3 5 minor residential units per 10ha net site area that: i. Are located within 20 metres of and share the driveway with either the principal dwelling; or ii. Are worker accommodation associ ated with primary production buildings;
Federated Farmers of New Zealand (S524)	S524.120	General Rural Zone	GRUZ - R21	Oppose in part	There should be provision for small scale rural industry in the General Rural Zone as a permitted activity. Such facilities have a functional need to locate in the rural zone.	Include a permitted activity rule for Rural industry: Activity Status Permitted Where: All performance standards for Rule GRUZ-R1X are complied with The maximum floor and yard area shall be 250m2
Federated Farmers of New Zealand (S524)	S524.121	General Rural Zone	GRUZ - R24	Oppose	GRUZ-R24 provides for non-rural activities as a Restricted Discretionary Activity up to 250m2. This is a more generous provision than for rural industry which has a functional need to locate in the GRUZ. A matter of discretion should be the functional need to locate in the GRUZ.	Amend GRUZ-R24 to Discretionary. Add an additional matter: The functional need to locate in the GRUZ.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Federated Farmers of New Zealand (S524)	S524.122	Rural Lifestyle Zone	RLZ - R1	Support in part	Support the excluded activity - however question the exclusion of stock yards and farm quarries? Clarity is needed as to why stock yards are excluded from the permitted activity criteria.	Clarity is needed as to why stock yards and farm quarries are excluded from the permitted activity criteria
Federated Farmers of New Zealand (S524)	S524.123	Rural Lifestyle Zone	RLZ - R3	Support in part	Minor residential units may be used to house staff in the rural lifestyle zone, where rural activities occur. The maximum gross floor area of 65m2 limits the type of unit and 80m2 is more appropriate.	Amend clause 3: There is no more than 1 minor residential unit with a maximum gross floor area of 6580m2 where this is located within 20 metres of and shares the driveway with the principal dwelling.
Federated Farmers of New Zealand (S524)	S524.124	Rural Zones	RURZ - P10	Support in part	Recognition of the visitor economy is needed but the location of tourism in the RURZ should not adversely affect rural production	Amend RURZ-P10 by adding and which do not adversely effect rural production activities
Federated Farmers of New Zealand (S524)	S524.125	Rural Zones	RURZ - P3	Support in part	Both RURZ-P2 and P3 relate to settlements and would be more appropriately located in the SETZ zone.	Move RURZ-P2 and P3 to SETZ-P1 and P2.
Federated Farmers of New Zealand (S524)	S524.126	Rural Zones	RURZ - 04	Support in part	Both RURZ-O3 and RURZ-O4 relate to the settlement zones. It would be more appropriate that these were included in the SETZ provisions.	Move RURZ-O3 and RURZ-O4 to SETZO1 and O2.
Federated Farmers of New Zealand (S524)	S524.127	Light	LIGHT - P2	Support in part	Primary sector activities require the use of artificial light for day-to-day operations. For instance, night light is required for dairy sheds where lights will likely be on before 7am, security (particularly around fuel storage), shearing sheds (when sheep are stored in sheds lights are left on overnight in wintering barns), and harvest and spraying (where machinery may be operating at any hour). Seasonal farming operations are not included in the definition of 'temporary activity' (enabled under LIGHT - P2),	Amend LIGHT-P1: Provide for the use of artificial outdoor lighting that: f. Enables rural production activities.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					therefore enablement of agricultural operations is required under P1.	
Federated Farmers of New Zealand (S524)	S524.128	Earthworks	EW - P2	Support	These provide for the practical requirements of earthworks while also recognising the need to minimise any adverse effects	Retain as notified
Federated Farmers of New Zealand (S524)	S524.129	Earthworks	EW - P3	Support	These provide for the practical requirements of earthworks while also recognising the need to minimise any adverse effects	Retain as notified
Federated Farmers of New Zealand (S524)	S524.130	Earthworks	EW - P4	Support	These provide for the practical requirements of earthworks while also recognising the need to minimise any adverse effects	Retain as notified
Federated Farmers of New Zealand (S524)	S524.131	Coastal Environment	CE - O2	Support	These objectives appear to be consistent with the NZCPS	Retain as notified.
Federated Farmers of New Zealand (S524)	S524.132	Coastal Environment	CE - O3	Support	These objectives appear to be consistent with the NZCPS	Retain as notified.
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.
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.
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.
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.
Federated Farmers of New Zealand (S524)	S524.137	Historic Heritage	HH - R5	Support	These rules refer to suitably qualified heritage professional. Heritage professional is defined, but as noted	Delete definition for "heritage professional" and replace in chapter as per wording used in these rules: suitably qualified

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					earlier, the definition is not appropriate. Suggest deletion of the definition and retain the qualifier in each rule to "suitably qualified"	heritage professional.
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.
Felicity Watson (S487)	S487.001	Planning Maps and Overlays	Natural Hazards	Amend		Greater clarification/justification of the flood hazard maps at Westport including an independent peer review.
Felicity Watson (S487)	S487.002	Natural Hazards	NHR52	Amend	Building consents recently approved are unlikely to meet the standards required in the proposed plan, therefore a peppered landscape is forming in Westport with properties raised to a variety of levels without any cohesion.	Reconsider the heights required in the short term to reflect heights building consents have been approved to recently, which is lower than that required by the rule.
Felicity Watson (S487)	S487.003	Natural Hazards	Westport Hazard Overlay	Amend	Regional Council has been considering options for flood protection for some time and its not certain where or when protection measures will be created, or if they will achieve the outcome required by Rule 52.	Confirmation on the timeframe and extent of construction of flood protection measures required to achieve NH - R52 (1).
Felicity Watson (S487)	S487.004	Natural Hazards	NHR52	Amend	Any resource consent application to seek a lesser floor level than the high standard required will generate a massive number of technical reports which makes resource consent more difficult and costly.	Provide a mechanism to seek floor level heights, or minimum building platform heights associated with subdivision from District or Regional Council on a case-by-case basis, so that expensive technical reports are not required every time someone wants to build a new house or modify an existing home. Environment Canterbury provide a flood risk assessment with floor levels upon request and a similar service should be available on the West Coast.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Fernando Tarango (S342)	S342.001	Planning Maps and Overlays	Natural Features and Landscapes	Amend	The entry to the Kahurangi National Park/Fenian Track is a one of a kind majestic entry with two dramatic and ancient limestone pyramids along the Oparara River. It is often referred to as 'The Pyramid' as its unique visual appearance shows the grand entry to Kahurangi National Park. This is part of the 'Karamea skyline' as it is visible from the entire Oparara Loop, the Last Resort (town) and the entirety of the Karamea Coastal area for locals and tourists.	Include "The Pyramid" feature at Karamea as an Outstanding Natural Landscape
Fernando Tarango (S342)	S342.002	Planning Maps and Overlays	Mineral Extraction Zone	Oppose	Our request is to mitigate and avoid further damage by limiting mineral extraction to this beautiful area and ensure it can be rehabilitated and preserved for the visual beauty and posterity of the Karamea Community and Karamea Coastal area.	Oppose expansion of mineral extraction zone further into "The Pyramid" at Karamea
Fernando Tarango (S342)	S342.003	Planning Maps and Overlays	Outstanding Natural Character	Amend	The entry to the Kahurangi National Park/Fenian Track is a one of a kind majestic entry with two dramatic and ancient limestone pyramids along the Oparara River. It is often referred to as 'The Pyramid' as its unique visual appearance shows the grand entry to Kahurangi National Park. This is part of the 'Karamea skyline' as it is visible from the entire Oparara Loop, the Last Resort (town) and the entirety of the Karamea Coastal area for locals and tourists	Include "The Pyramid" feature at Karamea as an Outstanding Natural Character Area
Fiona McDonald (S561)	S561.001	Planning Maps and Overlays	Natural Features and Landscapes	Amend	The boundary of the ONL is currently proposed to run on a diagonal to include a large stand of Pinus radiata near the Southern Boundary of the property. We believe the boundary should run down the southern side of the block of pine trees, so as to protect the native border on Limestone Creek, however the Pine	Review the ONL boundary on the property at 5186 State Highway, Punakaiki

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					trees eventually need to come down and are definitely of no outstanding natural significance. The boundary as it has been suggested cuts right through the only usable portion of our land.	
Fiona McDonald (S561)	S561.002	Planning Maps and Overlays	High Natural Character	Amend	This block of land is old farmland. There is very little usable land on this block for us due to terrain, the bush is all in the gullys and will not be touched anyway. There is little to no difference between our blocks of land under this designation to the other blocks in this area that don't have this designation other than the fact we are sitting on an old farm and coal mine, and they are not! There is not any High character about coal mine rubbish which we are always cleaning up and farmland.	Review the High Natural Character boundary on the property at 5186 State Highway, Punakaiki
Fiona McDonald (S561)	S561.003	Rural Lifestyle Zone	RLZ - R9	Oppose	BDC should not ask for different rules from other councils if this is a one district plan. As long term residents of this area we have had the long term objective of taking time out from this area at different life stages. This is an unfair disadvantage and is not a fair rule to be in place for this area. It is an area of high visitor values and part of the reason for our purchase in the first instance. This proposed rule is not at all future focused for a highly sought after tourist area	Apply the same approach to visitor accommodation in Buller District as occurs in Grey and Westland
Fiona McDonald (S561)	S561.004	Rural Lifestyle Zone	RLZ - R9	Amend	Larger families should be able to stay in this precious area at any time and not be restricted due to family size	increase the number of people who can stay in Residential Visitor Accommodation to allow larger families to stay.
Fire and Emergency New Zealand (S573)	S573.001	Interpretation	CRITICAL RESPONSE FACILITIES	Support	Fire and Emergency support the definition of 'critical facilities' as it includes fire stations as a critical facility.	No amendment sought.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Fire and Emergency New Zealand (S573)	\$573.002	Interpretation	CONTAMINATED LAND	Support	Fire and Emergency support the definition of contaminated land provided that the meaning of 'Hazardous Substance' is consistent with 'Hazardous Substances and New Organisms Act 1996'.	No amendment sought
Fire and Emergency New Zealand (S573)	S573.003	Interpretation	EMERGENCY SERVICE FACILITY	Support	Fire and Emergency support the definition of Emergency Service Facility.	No amendment sought.
Fire and Emergency New Zealand (S573)	S573.004	Hazardous Substances	Hazardous Substances	Amend	Fire and Emergency support the inclusion of the definition of 'Hazardous Substances' and it to be consistent with 'Hazardous Substances and New Organisms Act 1996'.	Hazardous Substances has the same meaning as in section 2 of the RMA: includes, but is not limited to, any substance defined in section 2 of the Hazardous Substances and New Organisms Act 1996 as a hazardous substance. The Hazardous Substances and New Organisms Act 1996 defines hazardous substances as meaning, unless expressly provided otherwise by regulations or an EPA notice, any substancea) with 1 or more of the following intrinsic properties: i. explosiveness: ii. flammability: iii. a capacity to oxidise: iv. corrosiveness: v. toxicity (including chronic toxicity): vi. ecotoxicity, with or without bioaccumulation; or which on contact with air or water (other than air or water where the temperature or pressure has been artificially increased or decreased) generates a substance with any 1 or more

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						of the properties specified in paragraph (a).
Fire and Emergency New Zealand (S573)	S573.005	Hazardous Substances	Hazardous Substances	Support	Fire and Emergency supports the definition of natural hazard being consistent with section 2 of the RMA.	Natural Hazard has the meaning as in section 2 of the RMA: means
						any atmospheric or earth or water related occurrence (including earthquake, tsunami, erosion, volcanic and geothermal activity, landslip, subsidence, sedimentation, wind, drought, fire, or flooding) the action of which adversely affects or may adversely affect human life, property, or other aspects of the environment.
Fire and Emergency New Zealand (S573)	S573.006	Interpretation	OPERATIONAL NEED	Support	The ability to construct and operate fire stations in locations which will enable reasonable response times to fire and other emergencies is paramount the health, safety and wellbeing of people and the community. Fire stations therefore need to be strategically located within and throughout communities to maximise their coverage and response times so that they can efficiently and effectively respond to emergency call outs in a timely way, thus avoiding or mitigating the potential for adverse effects associated with fire hazard and other emergencies.	No amendment sought
Fire and Emergency New Zealand (S573)	S573.007	Interpretation	TEMPORARY ACTIVITY	Support in part	Fire and Emergency supports in part the definition of 'temporary activity' insofar that it provides for temporary activities.	Amendment the definition as follows: Temporary activity means activities and their ancillary

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					Fire and Emergency seeks the inclusion of 'temporary emergency service training activities' to the definition for 'temporary activity'. This will allow the rules within the Temporary Activities chapter to be applicable to Fire and Emergency's training activities. In order to ensure an efficient and effective emergency response, firefighter training is an essential activity undertaken by Fire and Emergency.	buildings and structures that are intended to have a limited duration and incidence and are not part of a permanent activity that occurs on the site. They include: fairs; festivals and special events; commercial filming or video production activities; public firework displays and lighting shows; buildings and structures ancillary to construction projects; temporary farmers or crafts markets; and 6. temporary helicopter take-offs and landings. temporary emergency service training activities
Fire and Emergency New Zealand (S573)	S573.008	Infrastructure	Infrastructure	Support	For Fire and Emergency, it is important that adequate infrastructure is in place before enabling the development of these large growth areas, particularly those that are intended to be serviced with a reticulated water supply network. As such, Fire and Emergency supports the objectives and policies within the Infrastructure chapter insofar that they recognise the importance of providing for effective, resilient, efficient and safe infrastructure which maintains public health and safety.	No amendment sought
Fire and Emergency New Zealand (S573)	S573.009	Transport	Transport	Support	For fire appliances to access an emergency, it is important that the transportation network is designed, constructed, and operated in a way that ensures a safe, efficient, effective, integrated, resilient and sustainable transport system.	No amendment sought

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					Fire and Emergency recognises the	
					significant advantages of prioritisation of	
					street space for pedestrians and cyclists in urban environments. However, in	
					prioritising street space for pedestrians	
					and cyclists, care must be given to avoid	
					unintended consequences on Fire and	
					Emergency's ability to respond to	
					emergency events. Prior engagement	
					with Fire an Emergency and other	
					emergency service providers is therefore	
					important before such measures are	
					implemented.	
					In some cases, the provision of	
					cycleways on main arterial roads, the	
					narrowing of roads or incorporation of	
					speed controls as part of traffic-calming	
					programmes may inadvertently block or	
					significantly slow down a route required	
					by Fire and Emergency. If an emergency	
					appliance needs to park on a road, this	
					can mean the street/road is blocked to all	
					other traffic including other emergency	
					vehicles that may need to get past. This	
					is not only limited to residential streets,	
					but also more commercial and central city	
					areas.	
					Street furniture, trees and sculptures etc. can also make it difficult for fire	
					appliances to get close to building frontages and consequently fire hydrants	
					in the streets. In the case of larger	
					buildings, the street frontage is often	
					where the fire alarm control panel is	
					located. This component should be	
					considered during the update on any	
					urban design guidelines.	
					Fire and Emergency support a robust	
					policy framework that will see that	

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					consideration is given to the operational needs of emergency services in a fire or other emergency.	
Fire and Emergency New Zealand (S573)	S573.010	Transport	TRN - R1	Oppose in part	Fire and Emergency oppose part of TRN-R1 where requests to alter the minimum driveway width within Standard S3 to allow for fire appliance access and the inclusion of an additional standard relating to firefighting access.	No amendment sought to this rule.
Fire and Emergency New Zealand (S573)	S573.011	Transport	TRN - R12	Oppose in part	Fire and Emergency request that emergency service facilities have no limit on traffic movements imposed. As the table currently reads, FENZ would come under the Mixed Use or other activities not otherwise listed. As vehicle movements are unable to be determined, require consent as a restricted discretionary activity when establishing an emergency service facility in all zones under TRAN-R12. Fire and Emergency seeks relief through other provisions in the plan to ensure the establishment of emergency service facilities, are enabled as a permitted activity. New fire stations may be necessary in order to continue to achieve emergency response time commitments in stations where development occurs, and populations change. In this regard it is noted that Fire and Emergency is not a requiring authority under section 166 of the RMA, and therefore does not have the ability to designate land for the purposes of fire stations. Fire and Emergency considers that amending the thresholds set out in Table 6 provides for emergency service facilities in all zone as a permitted activity. This will better provide for health	Amendment sought:

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					and safety of the community by enabling the efficient functioning of Fire and Emergency in establishing and operating fire stations	
Fire and Emergency New Zealand (S573)	S573.012	Appendix One: Transport Performance Standards	TRNS3	Oppose in part	Fire and Emergency oppose in part the minimum driveway width of 3m with a preference for minimum driveway width to be 3.5m to sufficiently cater for the fire appliance.	Amendment sought: For all zones the minimum driveway width is 3m 3.5m, and maximum gradient is 1:5.
Fire and Emergency New Zealand (S573)	S573.013	Appendix One: Transport Performance Standards	TRNS3	Amend	Vehicular roading and access widths, surface and gradients should support the operational requirements of Fire and Emergency appliances. Fire and Emergency supports the amendment TRAN-S3 to the extent that it requires vehicle access standards that help ensure access design is a minimum width of 4m, and a maximum gradient of 1:5. However, Fire and Emergency vehicles have a maximum hose run distance of 75m. To effectively respond to a fire, it is vital that Fire and Emergency can access all parts of a building within the 75m horse run distance. As such, Fire and Emergency seek a new rule to apply to any access to a site that has a greater length than 50 metres, providing a distance of 25 metres that will allow the hose run to reach the entirety of buildings located onsite.	New rule sought: TRAN-S15 - Firefighting access
Fire and Emergency New Zealand (S573)	S573.014	Noise	NOISE - O2	Support	Fire and Emergency supports NOISE-R2 as it exempts emergency service activities from noise limits, provided that the noise source is from warning devices, activities at emergency service facilities associated with emergency response and / or emergency response training. Fire and Emergency also supports the	No amendments sought.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					exemption of emergency aviation movements from noise limits.	
Fire and Emergency New Zealand (S573)	S573.015	Subdivision	SUB - 02	Support	Fire and Emergency support SUB-O2 insofar as it promotes subdivision that is accessible from the transport network and provides for the health and well-being of communities.	No amendment sought.
Fire and Emergency New Zealand (S573)	S573.016	Subdivision	SUB - P2	Support	Fire and Emergency supports SUB-P3 insofar as it required subdivisions to be appropriately serviced and for infrastructure to be installed at the time of subdivision. Further, Fire and Emergency support the requirement for connections to reticulated systems to be provided where reticulation services are available. Fire and Emergency support the policy as it requires the provision of water supply infrastructure with sufficient capacity for firefighting purposes where reticulated services are not available.	No amendment sought.
Fire and Emergency New Zealand (S573)	S573.017	Subdivision	SUB - R1	Support	Boundary adjustments in all zones require resource consent as either a controlled or restricted discretionary activity. The matters of control/discretion both include the provision of infrastructure and services including for firefighting water supply. Fire and Emergency support this.	No amendment sought.
Fire and Emergency New Zealand (S573)	S573.018	Subdivision	SUB - P5	Support	The matters of control are restricted to the provision and design of physical access to and from the allotments, including roads, and the provision of firefighting water supply. Fire and Emergency support these provisions.	No amendments sought.
Fire and Emergency New Zealand (S573)	S573.019	Subdivision	SUB - S3	Support	Fire and Emergency support that the requirement for all allotments to have access to firefighting water where reticulated water supply is available and	No amendments sought.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					for the SNZ PAS 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice.	
Fire and Emergency New Zealand (S573)	S573.020	Subdivision	SUB - S6	Support	Fire and Emergency support the requirement for all allotments to have legal and physical access to a road compliant with the relevant standards set out in the transport chapter. Further, Fire and Emergency strongly support the use of New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509 in respect of compliance with the accessway dimension requirements.	No amendments sought.
Fire and Emergency New Zealand (S573)	S573.021	Residential Zones	RESZ - 01	Support	Fire and Emergency support an objective that promotes the provision of infrastructure within the General Residential Zone.	No amendments sought
Fire and Emergency New Zealand (S573)	S573.022	Residential Zones	RESZ - P10	Support	Fire and Emergency support a policy that requires developments to be serviced with all required infrastructure.	No amendments sought
Fire and Emergency New Zealand (S573)	S573.023	General Residential Zone	GRZ - R1	Support in part	Fire and Emergency supports in part the standards with GRZ-1, subject to an amendment to standard 8 that requires residential activities and units to provide fire fighting water supply where not connected to reticulated public water supply. It is noted there are cases that developments will not require subdivision consent, and therefore will not be subject to the water supply provisions of the SUB - Subdivision chapter, specifically, SUB-S3 that requires subdividers to provide a water supply. Therefore, a new standard is requested in the GRZ - General Residential Zone chapter to require the provision of firefighting water supply where development is not subject to	Add new standard as follows: 8. All residential units and buildings used for a residential activity must be connected to the community water supply and wastewater networks and stormwater from the site used for the activity must not drain to any public road except for secondary flow purposes; a. Where the new development will not be connected to a public reticulated water supply, or where an additional level of service is required that exceeds the level of service provided by the reticulated system, the developer must demonstrate how an alternative and satisfactory water supply can be provided to each lot.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					subdivision. An additional assessment matter is also sought. Where water supply servicing requirements cannot be met, this will provide council discretion as to the extent an activity is able to achieve compliance with the NZ Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008.	Note: The above does not replace regional rules which control the taking and use of groundwater and surface water. These rules must be complied with prior to the activity proceeding. Further advice and information about how an alternative and satisfactory firefighting water supply can be provided to a development can be obtained from Fire and Emergency New Zealand and the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008.
Fire and Emergency New Zealand (S573)	S573.024	General Residential Zone	GRZ - R2	Support in part	Fire and Emergency seeks an exemption for fire hose drying towers associated with emergency service facilities in order to appropriately provide for the operational requirements of Fire and Emergency. Whilst referred to as 'hose drying towers', they serve several purposes being for hose drying, communications and training purposes on station. The frequency of hose drying towers being required at stations is dependent on locational and operational requirements of each station. These structures can be around 12 to 15 metres in height. Fire and Emergency considers that the inclusion of an exemption for hose drying towers better provides for the health and safety of the community by enabling the efficient functioning of Fire and Emergency in establishing and operating fire stations.	Amendment sought to rule. 1 2. Masts, poles, aerials and pou whenua must not exceed 7m in height; except hose drying towers up to 15m in height.
Fire and Emergency New Zealand (S573)	S573.025	General Residential Zone	GRZ - R4	Amend	Subject to the acceptance of any relief sought regarding GRZ-R1 and assessment criteria for these rules, Fire	Add new standard as follows: X. All residential units and buildings used for a residential activity must be connected to

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					and Emergency supports GRZ-R4 - R6. It is noted that there will be cases that developments will not require subdivision consent, and therefore will not be subject to the water supply provisions of the SUB - Subdivision chapter. Therefore, additional standards that will require the provision of firefighting water supply and access where development is not subject to subdivision provisions are requested.	the community water supply and wastewater networks and stormwater from the site used for the activity must not drain to any public road except for secondary flow purposes; a. Where the new development will not be connected to a public reticulated water supply, or where an additional level of service is required that exceeds the level of service provided by the reticulated system, the developer must demonstrate how an alternative and satisfactory water supply can be provided to each lot. Note: The above does not replace regional rules which control the taking and use of groundwater andsurface water. These rules must be complied with prior to the activity proceeding. Further advice and information about how an alternative and satisfactory firefighting water supply can be provided to a development can be obtained from Fire and Emergency New Zealand and the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008.
Fire and Emergency New Zealand (S573)	S573.026	General Residential Zone	GRZ - R7	Amend	Subject to the acceptance of any relief sought regarding related standard GRZ-R1 and assessment criteria for these rules, Fire and Emergency supports GRZ-R7 - R10 It is noted that there will be cases that developments will not require subdivision consent, and therefore will not be subject to the water supply provisions of the SUB - Subdivision chapter. Therefore, additional standards that will require the provision of firefighting water supply and access	Add new standard as follows: x. All residential units and buildings used for a residential activity must be connected to the community water supply and wastewater networks and stormwater from the site used for the activity must not drain to any public road except for secondary flow purposes; a. Where the new development will not be connected to a public reticulated water supply, or where an additional level of service is required that exceeds the level of service provided by the reticulated system, the developer

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					where development is not subject to subdivision provisions are requested.	must demonstrate how an alternative and satisfactory water supply can be provided to each lot. Note: The above does not replace regional rules which control the taking and use of groundwater and surface water. These rules must be complied with prior to the activity proceeding. Further advice and information about how an alternative and satisfactory firefighting water supply can be provided to a development can be obtained from Fire and Emergency New Zealand and the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008.
Fire and Emergency New Zealand (S573)	S573.027	General Residential Zone	GRZ - R13	Amend	Subject to the acceptance of any relief sought regarding related standard GRZ-R1 and assessment criteria for these rules, Fire and Emergency supports GRZ-R13-GRZ-R16. It is noted that there will be cases that developments will not require subdivision consent, and therefore will not be subject to the water supply provisions of the SUB - Subdivision chapter. Therefore, additional matters of discretion that will require the provision of firefighting water supply and access where development is not subject to subdivision provisions are requested. This will help give effect to proposed GRZ-O2 and GRZ-P2.	Activities under these rules must consider the new matter of discretion as follows: Activity status: Restricted Discretionary Matters of discretion are restricted to: x. the extent to which the site is appropriately serviced including wastewater, stormwater, and water supply, including a firefighting water supply and access to that supply in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008.
Fire and Emergency New Zealand (S573)	S573.028	General Residential Zone	GRZ - R22	Oppose	Fire and Emergency do not support emergency service activities to be a discretionary activity in the General Residential Zone. New fire stations may be necessary in order to continue to achieve emergency response time commitments in situations where	Add new rule as follows: GRZ-RX Emergency Service Facilities Activity status: Permitted

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Fire and Emergency	2572 020	Lorgo Lot	III D7 D4	Sunnart	development occurs, and populations change. In this regard it is noted that Fire and Emergency is not a requiring authority under section 166 of the RMA, and therefore does not have the ability to designate land for the purposes of fire stations. Provisions within the rules of the district plan are therefore the best way to facilitate the development of any new fire stations within the district as urban development progresses. Fire and Emergency request that emergency service facilities are included as a permitted activity in the General Residential Zone. In addition, fire stations have specific requirements with relation to setback distances and vehicle crossings. Fire and Emergency request that emergency service facilities are exempt from these standards.	Add new standard as follows: 7. All
Fire and Emergency New Zealand (S573)	S573.029	Large Lot Residential Zone	LLRZ - R1	Support in part	Fire and Emergency supports in part the standards with LLRZ-R1, subject to an amendment to standard 7 that requires residential activities and units to provide firefighting water supply where not connected to reticulated public water supply. It is noted there are cases that developments will not require subdivision consent, and therefore will not be subject to the water supply provisions of the SUB - Subdivision chapter, specifically, SUB-S3 that requires subdividers to provide a water supply. Therefore, a new standard is requested in the LLRZ - Large Lot Residential Zone chapter to require the provision of firefighting water supply where development is not subject to subdivision. An additional assessment matter is also sought. Where water	residential units and buildings used for a residential activity must be connected to the community water supply and wastewater networks and stormwater from the site used for the activity must not drain to any public road except for secondary flow purposes; a. Where the new development will not be connected to a public reticulated water supply, or where an additional level of service is required that exceeds the level of service provided by the reticulated system, the developer must demonstrate how an alternative and satisfactory water supply can be provided to each lot. Note: The above does not replace regional rules which control the taking and use of groundwater and surface water. These rules must be complied with

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					supply servicing requirements cannot be met, this will provide council discretion as to the extent an activity is able to achieve compliance with the NZ Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008.	prior to the activity proceeding. Further advice and information about how an alternative and satisfactory firefighting water supply can be provided to a development can be obtained from Fire and Emergency New Zealand and the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008.
Fire and Emergency New Zealand (S573)	S573.030	Large Lot Residential Zone	LLRZ - R2	Amend	Fire and Emergency seeks an exemption for fire hose drying towers associated with emergency service facilities in order to appropriately provide for the operational requirements of Fire and Emergency. Whilst referred to as 'hose drying towers', they serve several purposes being for hose drying, communications and training purposes on station. The frequency of hose drying towers being required at stations is dependent on locational and operational requirements of each station. These structures can be around 12 to 15 metres in height. Fire and Emergency considers that the inclusion of an exemption for hose drying towers better provides for the health and safety of the community by enabling the efficient functioning of Fire and Emergency in establishing and operating fire stations.	Amendment to rule sought 1 2. Masts, poles, aerials and pou whenua must not exceed 7m in height; except hose drying towers up to 15m in height.
Fire and Emergency New Zealand (S573)	S573.031	Large Lot Residential Zone	LLRZ - R6	Support in part	Fire and Emergency supports in part LLRZ- R6, R7, R8 and R9 subject to the inclusion of a new standard within LLRZ-R1, that requires these activities to provide a firefighting water supply. It is noted that there will be cases that developments will not require subdivision, and therefore will not be subject to the	Retain as notified

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					water supply provisions of SUB - Subdivision chapter, specifically SUB-S3 that requires subdividers to provide a water supply. Therefore, a new standard is requires in the LLRZ - Large Lot Residential Zone chapter to require the provision of firefighting water supply where development is not subject to the subdivision provisions of the plan. This new standard will give effect to the Residential Objectives and Policies. An additional assessment matter is also sought. Where water supply servicing requirements cannot be met, this will provide council discretion as to the extent an activity is able to achieve compliance with the NZ Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008	
Fire and Emergency New Zealand (S573)	S573.032	Large Lot Residential Zone	LLRZ - R12	Support in part	Fire and Emergency supports in part LLRZ- R12, R13 and R14 subject to the inclusion of a new standard within LLRZ-R1, that requires these activities to provide a firefighting water supply. It is noted that there will be cases that developments will not require subdivision, and therefore will not be subject to the water supply provisions of SUB - Subdivision chapter, specifically SUB-S3 that requires subdividers to provide a water supply. Therefore, a new standard is requires in the LLRZ - Large Lot Residential Zone chapter to require the provision of firefighting water supply where development is not subject to the subdivision provisions of the plan. This new standard will give effect to the Residential Objectives and Policies. An additional assessment matter is also	Amendment to rule Discretion is restricted to: a b d. Water supply, wastewater and stormwater requirements, including a firefighting water supply and access to that supply in accordance with New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					sought. Where water supply servicing requirements cannot be met, this will provide council discretion as to the extent an activity is able to achieve compliance with the NZ Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008	
Fire and Emergency New Zealand (S573)	S573.033	Large Lot Residential Zone	LLRZ-R18	Oppose	Fire and Emergency do not support emergency service activities to be a discretionary activity in the Large Lot Zone. New fire stations may be necessary in order to continue to achieve emergency response time commitments in situations where development occurs, and populations change. In this regard it is noted that Fire and Emergency is not a requiring authority under section 166 of the RMA, and therefore does not have the ability to designate land for the purposes of fire stations. Provisions within the rules of the district plan are therefore the best way to facilitate the development of any new fire stations within the district as urban development progresses. Fire and Emergency request that emergency service facilities are included as a permitted activity in the Large Lot Zone. In addition, fire stations have specific requirements with relation to setback distances and vehicle crossings. Fire and Emergency request that emergency service facilities are exempt from these standards.	New activity status sought LLRZ - RX Emergency Service Activities Activity Status: Permitted
Fire and Emergency New Zealand (S573)	S573.034	Medium Density Residential Zone	MRZ - R1	Amend	Fire and Emergency supports in part the standards with MRZ-R1, subject to an amendment to standard 7 that requires residential activities and units to provide firefighting water supply where not connected to reticulated public water	Add new standard as follows: 7. All residential units and buildings used for a residential activity must be connected to the community water supply and wastewater networks and stormwater from the site used for the activity must not drain

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					supply. It is noted there are cases that developments will not require subdivision consent, and therefore will not be subject to the water supply provisions of the SUB - Subdivision chapter, specifically, SUB-S3 that requires subdividers to provide a water supply. Therefore, a new standard is requested in the LLRZ - Large Lot Residential Zone chapter to require the provision of firefighting water supply where development is not subject to subdivision.	to any public road except for secondary flow purposes; a. Where the new development will not be connected to a public reticulated water supply, or where an additional level of service is required that exceeds the level of service provided by the reticulated system, the developer must demonstrate how an alternative and satisfactory water supply can be provided to each lot. Note: The above does not replace regional rules which control the taking and use of groundwater and surface water. These rules must be complied with prior to the activity proceeding. Further advice and information about how an alternative and satisfactory firefighting water supply can be provided to a development can be obtained from Fire and Emergency New Zealand and the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008.
Fire and Emergency New Zealand (S573)	S573.035	Medium Density Residential Zone	MRZ - R2	Amend	Fire and Emergency seeks an exemption for fire hose drying towers associated with emergency service facilities in order to appropriately provide for the operational requirements of Fire and Emergency. Whilst referred to as 'hose drying towers', they serve several purposes being for hose drying, communications and training purposes on station. The frequency of hose drying towers being required at stations is dependent on locational and operational requirements of each station. These structures can be around 12 to 15 metres in height. Fire and Emergency considers that the inclusion of an exemption for	Amendment sought 2. Masts, poles, aerials and pou whenua must not exceed 7m in height; except hose drying towers up to 15m in height.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					hose drying towers better provides for the health and safety of the community by enabling the efficient functioning of Fire and Emergency in establishing and operating fire stations.	
Fire and Emergency New Zealand (S573)	S573.036	Medium Density Residential Zone	MRZ - R7	Amend	Fire and Emergency supports in part MRZ- R4 - R8, subject to the inclusion of a new standard within each activity, that requires these activities to provide a firefighting water supply as per MRZ - R1. It is noted that there will be cases that developments will not require subdivision, and therefore will not be subject to the water supply provisions of SUB - Subdivision chapter, specifically SUB-S3 that requires subdividers to provide a water supply. Therefore, a new standard is requireds in the MRZ - Medium Density Residential Zone chapter to require the provision of firefighting water supply where development is not subject to the subdivision provisions of the plan. This new standard will give effect to the Residential Objectives and Policies. An additional assessment matter is also sought. Where water supply servicing requirements cannot be met, this will provide council discretion as to the extent an activity is able to achieve compliance with the NZ Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008	Retain as notified
Fire and Emergency New Zealand (S573)	S573.037	Medium Density Residential Zone	MRZ - R12	Not Stated	Fire and Emergency supports in part MRZ- R12, R13 and R14 subject to the inclusion of a new standard within MRZ-R1, that requires these activities to provide a firefighting water supply. It is noted that there will be cases that developments will not require subdivision,	Retain as notified subject to new standard being introduced in MRZ - R1

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					and therefore will not be subject to the water supply provisions of SUB - Subdivision chapter, specifically SUB-S3 that requires subdividers to provide a water supply. Therefore, a new standard is requires in the MRZ - Medium Density Residential Zone chapter to require the provision of firefighting water supply where development is not subject to the subdivision provisions of the plan. This new standard will give effect to the Residential Objectives and Policies. An additional assessment matter is also sought. Where water supply servicing requirements cannot be met, this will provide council discretion as to the extent an activity is able to achieve compliance with the NZ Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008.	
Fire and Emergency New Zealand (S573)	S573.038	Rural Zones	RURZ - 06	Support	Fire and Emergency supports RURZ-06 that ensures all rural zones are adequately serviced, particularly in relation to firefighting water supply.	Retain as notified.
Fire and Emergency New Zealand (S573)	S573.039	Rural Zones	RURZ - P11	Amend	Fire and Emergency supports this policy however an amendment to the policy is sought that ensures all land use activities in the General Rural Zone are adequately serviced, particularly in relation to firefighting water supply.	Amendment sought. RURZ-P11 a b c. On site provision of water supply with sufficient capacity for firefighting purposes and on-site land treatment and disposal of stormwater and wastewater.
Fire and Emergency New Zealand (S573)	S573.040	General Rural Zone	GRUZ - R1	Amend	Fire and Emergency supports in part GRUZ- R1 subject to the inclusion of a new standard within GRUZ-R1, that requires these activities to provide a firefighting water supply. It is noted that there will be cases that	New standard sought 7. All new developments that will require a water supply, including for firefighting purposes, must be connected to a public reticulated water supply, where one is available. 8. Where the new development will not be

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					developments will not require subdivision, and therefore will not be subject to the water supply provisions of SUB - Subdivision chapter, specifically SUB-S3 that requires subdividers to provide a water supply. Therefore, a new standard requiring in the GRUZ - General Rural Zone chapter to require the provision of firefighting water supply where development is not subject to the subdivision provisions of the plan. This new standard will give effect to the Rural Objectives and Policies. An additional assessment matter is also sought. Where water supply servicing requirements cannot be met, this will provide council discretion as to the extent an activity is able to achieve compliance with the NZ Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008	connected to a public reticulated water supply, or where an additional level of service is required that exceeds the level of service provided by the reticulated system, the developer must demonstrate how an alternative and satisfactory water supply can be provided to each lot. Note: The above does not replace regional rules which control the taking and use of groundwater and surface water. These rules must be complied with prior to the activity proceeding. Further advice and information about how an alternative and satisfactory firefighting water supply can be provided to a development can be obtained from Fire and Emergency New Zealand and the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008
Fire and Emergency New Zealand (S573)	S573.041	General Rural Zone	GRUZ - R3	Support in part	Fire and Emergency supports in part GRUZ- R3 subject to the inclusion of a new standard within GRUZ-R1, that requires these activities to provide a firefighting water supply as outlined above. It is noted that there will be cases that developments will not require subdivision, and therefore will not be subject to the water supply provisions of SUB - Subdivision chapter, specifically SUB-S3 that requires subdividers to provide a water supply. Therefore, a new standard requiring in the GRUZ - General Rural Zone chapter to require the provision of firefighting water supply where development is not subject to the subdivision provisions of the plan. This	No amendments sought

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					new standard will give effect to the Rural Objectives and Policies. An additional assessment matter is also sought. Where water supply servicing requirements cannot be met, this will provide council discretion as to the extent an activity is able to achieve compliance with the NZ Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008	
Fire and Emergency New Zealand (S573)	S573.042	General Rural Zone	GRUZ - R4	Amend	Fire and Emergency supports in part GRUZ-R4, R7, R8, R9, R13, and R14, subject to the inclusion of a new standard that requires these activities to provide a firefighting water supply. It is noted that there will be cases that development in the General Rural Zone will not require subdivision, and therefore will not be subject to the water supply provisions of the SUB - S3- Subdivision chapter. Therefore, a new condition is requested in the GRUZ - General Rural Zone chapter to require the provision of services where development is not subject to subdivision. This new standard will better give effect to new proposed policy GRUZ-P2 sought by Fire and Emergency. An additional assessment matter is also sought. Where water supply servicing requirements cannot be met, this will provide council discretion as to the extent an activity is able to achieve compliance with the NZ Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008	Retain as notified provided amendment to R1 occurs.
Fire and Emergency New Zealand (S573)	S573.043	General Rural Zone	GRUZ - R5	Amend	Fire and Emergency supports in part GRUZ-R4, R7, R8, R9, R13, and R14, subject to the inclusion of a new standard	Retain as notified provided amendment to R1 occurs.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					that requires these activities to provide a firefighting water supply. It is noted that there will be cases that development in the General Rural Zone will not require subdivision, and therefore will not be subject to the water supply provisions of the SUB - S3- Subdivision chapter. Therefore, a new condition is requested in the GRUZ - General Rural Zone chapter to require the provision of services where development is not subject to subdivision. This new standard will better give effect to new proposed policy GRUZ-P2 sought by Fire and Emergency. An additional assessment matter is also sought. Where water supply servicing requirements cannot be met, this will provide council discretion as to the extent an activity is able to achieve compliance with the NZ Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008	
Fire and Emergency New Zealand (S573)	S573.044	General Rural Zone	GRUZ - R6	Amend	Fire and Emergency supports in part GRUZ-R4, R7, R8, R9, R13, and R14, subject to the inclusion of a new standard that requires these activities to provide a firefighting water supply. It is noted that there will be cases that development in the General Rural Zone will not require subdivision, and therefore will not be subject to the water supply provisions of the SUB - S3- Subdivision chapter. Therefore, a new condition is requested in the GRUZ - General Rural Zone chapter to require the provision of services where development is not subject to subdivision. This new standard will better give effect to new proposed	Retain as notified provided amendment to R1 occurs.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					policy GRUZ-P2 sought by Fire and Emergency. An additional assessment matter is also sought. Where water supply servicing requirements cannot be met, this will provide council discretion as to the extent an activity is able to achieve compliance with the NZ Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008	
Fire and Emergency New Zealand (S573)	S573.045	General Rural Zone	GRUZ - R7	Amend	Fire and Emergency supports in part GRUZ-R4, R7, R8, R9, R13, and R14, subject to the inclusion of a new standard that requires these activities to provide a firefighting water supply. It is noted that there will be cases that development in the General Rural Zone will not require subdivision, and therefore will not be subject to the water supply provisions of the SUB - S3- Subdivision chapter. Therefore, a new condition is requested in the GRUZ - General Rural Zone chapter to require the provision of services where development is not subject to subdivision. This new standard will better give effect to new proposed policy GRUZ-P2 sought by Fire and Emergency. An additional assessment matter is also sought. Where water supply servicing requirements cannot be met, this will provide council discretion as to the extent an activity is able to achieve compliance with the NZ Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008	Retain as notified provided amendment to R1 occurs.
Fire and Emergency New Zealand (S573)	S573.046	General Rural Zone	GRUZ - R8	Amend	Fire and Emergency supports in part GRUZ-R4, R7, R8, R9, R13, and R14, subject to the inclusion of a new standard	Retain as notified provided amendment to R1 occurs.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					that requires these activities to provide a firefighting water supply. It is noted that there will be cases that development in the General Rural Zone will not require subdivision, and therefore will not be subject to the water supply provisions of the SUB - S3- Subdivision chapter. Therefore, a new condition is requested in the GRUZ - General Rural Zone chapter to require the provision of services where development is not subject to subdivision. This new standard will better give effect to new proposed policy GRUZ-P2 sought by Fire and Emergency. An additional assessment matter is also sought. Where water supply servicing requirements cannot be met, this will provide council discretion as to the extent an activity is able to achieve compliance with the NZ Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008	
Fire and Emergency New Zealand (S573)	S573.047	General Rural Zone	GRUZ - R9	Amend	Fire and Emergency supports in part GRUZ-R4, R7, R8, R9, R13, and R14, subject to the inclusion of a new standard that requires these activities to provide a firefighting water supply. It is noted that there will be cases that development in the General Rural Zone will not require subdivision, and therefore will not be subject to the water supply provisions of the SUB - S3- Subdivision chapter. Therefore, a new condition is requested in the GRUZ - General Rural Zone chapter to require the provision of services where development is not subject to subdivision. This new standard will better give effect to new proposed	Retain as notified provided amendment to R1 occurs.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					policy GRUZ-P2 sought by Fire and Emergency. An additional assessment matter is also sought. Where water supply servicing requirements cannot be met, this will provide council discretion as to the extent an activity is able to achieve compliance with the NZ Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008	
Fire and Emergency New Zealand (S573)	S573.048	General Rural Zone	GRUZ - R10	Amend	Fire and Emergency supports in part GRUZ-R4, R7, R8, R9, R13, and R14, subject to the inclusion of a new standard that requires these activities to provide a firefighting water supply. It is noted that there will be cases that development in the General Rural Zone will not require subdivision, and therefore will not be subject to the water supply provisions of the SUB - S3- Subdivision chapter. Therefore, a new condition is requested in the GRUZ - General Rural Zone chapter to require the provision of services where development is not subject to subdivision. This new standard will better give effect to new proposed policy GRUZ-P2 sought by Fire and Emergency. An additional assessment matter is also sought. Where water supply servicing requirements cannot be met, this will provide council discretion as to the extent an activity is able to achieve compliance with the NZ Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008	Retain as notified provided amendment to R1 occurs.
Fire and Emergency New Zealand (S573)	S573.049	General Rural Zone	GRUZ - R11	Amend	Fire and Emergency supports in part GRUZ-R4, R7, R8, R9, R13, and R14, subject to the inclusion of a new standard	Retain as notified provided amendment to R1 occurs.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					that requires these activities to provide a firefighting water supply. It is noted that there will be cases that development in the General Rural Zone will not require subdivision, and therefore will not be subject to the water supply provisions of the SUB - S3- Subdivision chapter. Therefore, a new condition is requested in the GRUZ - General Rural Zone chapter to require the provision of services where development is not subject to subdivision. This new standard will better give effect to new proposed policy GRUZ-P2 sought by Fire and Emergency. An additional assessment matter is also sought. Where water supply servicing requirements cannot be met, this will provide council discretion as to the extent an activity is able to achieve compliance with the NZ Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008	
Fire and Emergency New Zealand (S573)	S573.050	General Rural Zone	GRUZ - R12	Amend	Fire and Emergency supports in part GRUZ-R4, R7, R8, R9, R13, and R14, subject to the inclusion of a new standard that requires these activities to provide a firefighting water supply. It is noted that there will be cases that development in the General Rural Zone will not require subdivision, and therefore will not be subject to the water supply provisions of the SUB - S3- Subdivision chapter. Therefore, a new condition is requested in the GRUZ - General Rural Zone chapter to require the provision of services where development is not subject to subdivision. This new standard will better give effect to new proposed	Retain as notified provided amendment to R1 occurs.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					policy GRUZ-P2 sought by Fire and Emergency. An additional assessment matter is also sought. Where water supply servicing requirements cannot be met, this will provide council discretion as to the extent an activity is able to achieve compliance with the NZ Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008	
Fire and Emergency New Zealand (S573)	S573.051	General Rural Zone	GRUZ - R13	Amend	Fire and Emergency supports in part GRUZ-R4, R7, R8, R9, R13, and R14, subject to the inclusion of a new standard that requires these activities to provide a firefighting water supply. It is noted that there will be cases that development in the General Rural Zone will not require subdivision, and therefore will not be subject to the water supply provisions of the SUB - S3- Subdivision chapter. Therefore, a new condition is requested in the GRUZ - General Rural Zone chapter to require the provision of services where development is not subject to subdivision. This new standard will better give effect to new proposed policy GRUZ-P2 sought by Fire and Emergency. An additional assessment matter is also sought. Where water supply servicing requirements cannot be met, this will provide council discretion as to the extent an activity is able to achieve compliance with the NZ Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008	Retain as notified provided amendment to R1 occurs.
Fire and Emergency New Zealand (S573)	S573.052	General Rural Zone	GRUZ - R14	Amend	Fire and Emergency supports in part GRUZ-R4, R7, R8, R9, R13, and R14, subject to the inclusion of a new standard	Retain as notified provided amendment to R1 occurs.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					that requires these activities to provide a firefighting water supply. It is noted that there will be cases that development in the General Rural Zone will not require subdivision, and therefore will not be subject to the water supply provisions of the SUB - S3- Subdivision chapter. Therefore, a new condition is requested in the GRUZ - General Rural Zone chapter to require the provision of services where development is not subject to subdivision. This new standard will better give effect to new proposed policy GRUZ-P2 sought by Fire and Emergency. An additional assessment matter is also sought. Where water supply servicing requirements cannot be met, this will provide council discretion as to the extent an activity is able to achieve compliance with the NZ Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008	
Fire and Emergency New Zealand (S573)	S573.053	General Rural Zone	GRUZ - R10	Support	Fire and Emergency supports in part GRUZ-R10 as it provides for emergency service activities in the General Rural Zone as a permitted activity, subject to the performance standards set out in GRUZ-R1 and within R10. Non-compliance with performance standards set out in GRUZ-R10(1) requires resource consent as a restricted discretionary activity. This approach is supported by Fire and Emergency as the performance standards with the exception of height and setbacks are not relevant.	Retain as notified

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Fire and Emergency New Zealand (S573)	S573.054	Rural Lifestyle Zone	RLZ - R1	Oppose in part	Height Regarding point 3, Fire and Emergency oppose the maximum height of non-residential activities as being 7m. Fire stations are typically single storied buildings of approximately 8-9m in height. Therefore, an amendment to the maximum height above ground level is 10m. Fire and Emergency seek an exemption for hose drying towners associated with emergency service facilities in order to appropriately provide for the operational requirements of Fire and Emergency. Whilst referred to as 'hose drying towers', they serve several purposes being for hose drying, communications and training purposes on station. Hose drying towers being required at stations is dependent on locational and operational requirements of each station. These structures can be around 12 to 15 metres in height. Fire and Emergency considers that the inclusion of an exemption for hose drying towers better provides for the health and safety of the community by enabling the efficient functioning of Fire and Emergency in establishing and operating fire stations. Road boundary setback Fire and Emergency request that Emergency Service Facilities (as per RLZ-R10) are excluded from the minimum setback from road boundaries in the Rural Lifestyle Zone. This supports the logistical and operational requirements of Fire and Emergency. Firefighting water supply	Amendment sought to include below 3. The maximum height above ground level is: i. 10m for residential buildings and emergency service facilities and critical facilities. 4. Buildings are set back a minimum of 10m from the road boundary, 20m from the state highway boundary and 10m from the internal boundaries. Advice Note: Emergency service facilities and critical facilities are excluded from this rule. 8. All new developments that will require a water supply, including for firefighting purposes, must be connected to a public reticulated water supply, where one is available. 9. Where the new development will not be connected to a public reticulated water supply, or where an additional level of service is required that exceeds the level of service provided by the reticulated system, the developer must demonstrate how an alternative and satisfactory water supply can be provided to each lot. Note: The above does not replace regional rules which control the taking and use of groundwater and surface water. These rules must be complied with prior to the activity proceeding. Further advice and information about how an alternative and satisfactory firefighting water supply can be provided to a development can be obtained from Fire and Emergency New Zealand and the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					Fire and Emergency supports in part RLZ- R1 subject to the inclusion of a new standard within RLZ-R1, that requires these activities to provide a firefighting water supply. It is noted that there will be cases that developments will not require subdivision, and therefore will not be subject to the water supply provisions of SUB - Subdivision chapter, specifically SUB-S3 that requires subdividers to provide a water supply. Therefore, a new standard requiring in the RLZ -Rural Lifestyle Zone chapter to require the provision of firefighting water supply where development is not subject to the subdivision provisions of the plan. This new standard will give effect to the Rural Objectives and Policies. An additional assessment matter is also sought. Where water supply servicing requirements cannot be met, this will provide council discretion as to the extent an activity is able to achieve compliance with the NZ Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008.	PAS 4509:2008
Fire and Emergency New Zealand (S573)	S573.055	Rural Lifestyle Zone	RLZ - R3	Support in part	Fire and Emergency supports in part RLZ- R3 subject to the inclusion of a new standard within RLZ-R1, that requires these activities to provide a firefighting water supply as outlined above. It is noted that there will be cases that developments will not require subdivision, and therefore will not be subject to the water supply provisions of SUB - Subdivision chapter, specifically SUB-S3 that requires subdividers to provide a water supply. Therefore, a new standard	No amendment sought except as set out above.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					requiring in the GRUZ - General Rural Zone chapter to require the provision of firefighting water supply where development is not subject to the subdivision provisions of the plan. This new standard will give effect to the Rural Objectives and Policies. An additional assessment matter is also sought. Where water supply servicing requirements cannot be met, this will provide council discretion as to the extent an activity is able to achieve compliance with the NZ Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008	
Fire and Emergency New Zealand (S573)	S573.056	Rural Lifestyle Zone	RLZ - R4	Support in part	Fire and Emergency supports in part RLZ-R4, R7, R8, and R9, subject to the inclusion of a new standard within RLZ-R1 that requires these activities to provide a firefighting water supply. It is noted that there will be cases that development in the Rural Lifestyle Zone will not require subdivision, and therefore will not be subject to the water supply provisions of the SUB - S3- Subdivision chapter. Therefore, a new condition is requested in the GRUZ - General Rural Zone chapter to require the provision of services where development is not subject to subdivision. This new standard will better give effect to new proposed policy GRUZ-P2 sought by Fire and Emergency. An additional assessment matter is also sought. Where water supply servicing requirements cannot be met, this will provide council discretion as to the extent an activity is able to achieve compliance	No amendment sought

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					Water Supplies Code of Practice SNA PAS 4509:2008	
Fire and Emergency New Zealand (S573)	S573.057	Rural Lifestyle Zone	RLZ - R5	Support in part	Fire and Emergency supports in part RLZ-R4, R7, R8, and R9, subject to the inclusion of a new standard within RLZ-R1 that requires these activities to provide a firefighting water supply. It is noted that there will be cases that development in the Rural Lifestyle Zone will not require subdivision, and therefore will not be subject to the water supply provisions of the SUB - S3- Subdivision chapter. Therefore, a new condition is requested in the GRUZ - General Rural Zone chapter to require the provision of services where development is not subject to subdivision. This new standard will better give effect to new proposed policy GRUZ-P2 sought by Fire and Emergency. An additional assessment matter is also sought. Where water supply servicing requirements cannot be met, this will provide council discretion as to the extent an activity is able to achieve compliance with the NZ Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008	No amendment sought
Fire and Emergency New Zealand (S573)	S573.058	Rural Lifestyle Zone	RLZ - R6	Support in part	Fire and Emergency supports in part RLZ-R4, R7, R8, and R9, subject to the inclusion of a new standard within RLZ-R1 that requires these activities to provide a firefighting water supply. It is noted that there will be cases that development in the Rural Lifestyle Zone will not require subdivision, and therefore will not be subject to the water supply provisions of the SUB - S3- Subdivision chapter. Therefore, a new condition is	No amendment sought

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					requested in the GRUZ - General Rural Zone chapter to require the provision of services where development is not subject to subdivision. This new standard will better give effect to new proposed policy GRUZ-P2 sought by Fire and Emergency. An additional assessment matter is also sought. Where water supply servicing requirements cannot be met, this will provide council discretion as to the extent an activity is able to achieve compliance with the NZ Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008	
Fire and Emergency New Zealand (S573)	S573.059	Rural Lifestyle Zone	RLZ - R7	Support in part	Fire and Emergency supports in part RLZ-R4, R7, R8, and R9, subject to the inclusion of a new standard within RLZ-R1 that requires these activities to provide a firefighting water supply. It is noted that there will be cases that development in the Rural Lifestyle Zone will not require subdivision, and therefore will not be subject to the water supply provisions of the SUB - S3- Subdivision chapter. Therefore, a new condition is requested in the GRUZ - General Rural Zone chapter to require the provision of services where development is not subject to subdivision. This new standard will better give effect to new proposed policy GRUZ-P2 sought by Fire and Emergency. An additional assessment matter is also sought. Where water supply servicing requirements cannot be met, this will provide council discretion as to the extent an activity is able to achieve compliance with the NZ Fire Service Firefighting	No amendment sought

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					Water Supplies Code of Practice SNA PAS 4509:2008	
Fire and Emergency New Zealand (S573)	S573.060	Rural Lifestyle Zone	RLZ - R8	Support in part	Fire and Emergency supports in part RLZ-R4, R7, R8, and R9, subject to the inclusion of a new standard within RLZ-R1 that requires these activities to provide a firefighting water supply. It is noted that there will be cases that development in the Rural Lifestyle Zone will not require subdivision, and therefore will not be subject to the water supply provisions of the SUB - S3- Subdivision chapter. Therefore, a new condition is requested in the GRUZ - General Rural Zone chapter to require the provision of services where development is not subject to subdivision. This new standard will better give effect to new proposed policy GRUZ-P2 sought by Fire and Emergency. An additional assessment matter is also sought. Where water supply servicing requirements cannot be met, this will provide council discretion as to the extent an activity is able to achieve compliance with the NZ Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008	No amendment sought
Fire and Emergency New Zealand (S573)	S573.061	Rural Lifestyle Zone	RLZ - R9	Support in part	Fire and Emergency supports in part RLZ-R4, R7, R8, and R9, subject to the inclusion of a new standard within RLZ-R1 that requires these activities to provide a firefighting water supply. It is noted that there will be cases that development in the Rural Lifestyle Zone will not require subdivision, and therefore will not be subject to the water supply provisions of the SUB - S3- Subdivision chapter. Therefore, a new condition is	No amendment sought

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					requested in the GRUZ - General Rural Zone chapter to require the provision of services where development is not subject to subdivision. This new standard will better give effect to new proposed policy GRUZ-P2 sought by Fire and Emergency. An additional assessment matter is also sought. Where water supply servicing requirements cannot be met, this will provide council discretion as to the extent an activity is able to achieve compliance with the NZ Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008	
Fire and Emergency New Zealand (S573)	S573.062	Rural Lifestyle Zone	RLZ - R10	Support in part	Fire and Emergency supports in part RLZ-R10 as it provides for emergency service activities in the Rural Lifestyle Zone as a permitted activity, subject to compliance with a suite of conditions. Non-compliance with the conditions set out in RLZ-R10 requires resource consent as a restricted discretionary activity. Unless the changes to RLZ-R1 are made and Emergency Service Facilities are excluded from hours of operation than resource consent will always be required. New fire stations may be necessary in order to continue to achieve emergency response time commitments in situations where development occurs, and populations change. In this regard it is noted that Fire and Emergency is not a requiring authority under section 166 of the RMA, and therefore does not have the ability to designate land for the purposes of fire stations. Provisions within the rules of the PDP are	Amendment sought: 2. Hours of operation are limited to: i. 7am-10pm weekdays; and ii. 8am - 8pm weekends and public holidays; except iii. For community halls lawfully established at the time of notification of the Plan: 3. Hours of operation on Friday and Saturday are 7am - 12pm midnight; and 4. No restriction on hours is in place for up to 12 days per calendar year. Advice note: Emergency Service Facilities are excluded from the standards 2 -4 relating to the hours of operation.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					therefore the best way to facilitate the development of any new fire stations within the district as urban development progresses. Fire and Emergency however notes that while defined and included in the rule overview table and appears to be provide for in RLZ-R10, emergency aviation movements are not provided for in the rule framework. Fire and Emergency requests that Council provide for emergency aviation movements in the zone rule framework. Rule RLZ-R10 is supported, subject to the consequential amendments sought to the standards in this chapter.	
Fire and Emergency New Zealand (S573)	S573.063	Settlement Zone	SETZ - R1	Support in part	Fire and Emergency supports in part the standards with SETZ-R1, subject to an amendment to standard 2 that requires residential activities and units to provide firefighting water supply where not connected to reticulated public water supply. It is noted there are cases that developments will not require subdivision consent, and therefore will not be subject to the water supply provisions of the SUB - Subdivision chapter, specifically, SUB-S3 that requires subdividers to provide a water supply. Therefore, a new standard is requested in the SETZ - Settlement Zone chapter to require the provision of firefighting water supply where development is not subject to subdivision. An additional assessment matter is also sought. Where water supply servicing requirements cannot be met, this will provide council discretion as to the extent an activity is able to achieve compliance	Add new standard as follows: 2. Where the settlement is serviced by a network utility operator for wastewater, water supply or stormwater all residential units and buildings used for a residential activity must be connected to the community wastewater, water supply and stormwater infrastructure a. Where the new development will not be connected to a public reticulated water supply, or where an additional level of service is required that exceeds the level of service provided by the reticulated system, the developer must demonstrate how an alternative and satisfactory water supply can be provided to each lot. Note: The above does not replace regional rules which control the taking and use of groundwater and surface water. These rules must be complied with prior to the activity proceeding. Further advice and information about how an alternative and satisfactory firefighting water supply can be provided to a

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					with the NZ Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008.	development can be obtained from Fire and Emergency New Zealand and the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008.
Fire and Emergency New Zealand (S573)	S573.064	Settlement Zone	SETZ - R2	Support	Fire and Emergency support the inclusion of Emergency Service facilities to have a maximum height of 10m.	No amendment sought
Fire and Emergency New Zealand (S573)	S573.065	Settlement Zone	SETZ - R3	Support	Fire and Emergency support SETZ-R3 provided amendments are made to SETZ - R1 are completed.	Retained as notified
Fire and Emergency New Zealand (S573)	S573.066	Settlement Zone	SETZ - R4	Support in part	Fire and Emergency supports in part the standards with SETZ-R4, subject to an amendment to standard 3 that requires residential activities and units to provide firefighting water supply where not connected to reticulated public water supply. It is noted there are cases that developments will not require subdivision consent, and therefore will not be subject to the water supply provisions of the SUB - Subdivision chapter, specifically, SUB-S3 that requires subdividers to provide a water supply. Therefore, a new standard is requested in the SETZ - Settlement Zone chapter to require the provision of firefighting water supply where development is not subject to subdivision. An additional assessment matter is also sought. Where water supply servicing requirements cannot be met, this will provide council discretion as to the extent an activity is able to achieve compliance with the NZ Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008.	Amendment sought 3. In areas not serviced by reticulated wastewater, stormwater and water supply: i. The average residential building density is no more than one unit per 1000m2 net site area, although areas can be clustered; and ii. On-site wastewater, water supply and stormwater systems are developed to serve the entire papakāinga. iii. Where the new development will not be connected to a public reticulated water supply, or where an additional level of service is required that exceeds the level of service provided by the reticulated system, the developer must demonstrate how an alternative and satisfactory water supply can be provided to each lot. Note: The above does not replace regional rules which control the taking and use of groundwater and surface water. These rules must be complied with prior to the activity proceeding. Further advice and information about how an alternative and satisfactory firefighting water supply can be provided to a development can be obtained from Fire

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						and Emergency New Zealand and the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008.
Fire and Emergency New Zealand (S573)	S573.067	Settlement Zone	SETZ - R5	Support in part	Fire and Emergency support these activities provided the provisions in SETZ-R1 are amended.	Retain as notified.
Fire and Emergency New Zealand (S573)	S573.068	Settlement Zone	SETZ - R6	Support in part	Fire and Emergency support these activities provided the provisions in SETZ-R1 are amended.	Retain as notified.
Fire and Emergency New Zealand (S573)	S573.069	Settlement Zone	SETZ - R7	Support in part	Fire and Emergency support these activities provided the provisions in SETZ-R1 are amended.	Retain as notified.
Fire and Emergency New Zealand (S573)	S573.070	Settlement Zone	SETZ - R8	Support in part	Fire and Emergency support these activities provided the provisions in SETZ-R1 are amended.	Retain as notified.
Fire and Emergency New Zealand (S573)	S573.071	Settlement Zone	SETZ - R9	Support in part	Fire and Emergency support these activities provided the provisions in SETZ-R1 are amended.	Retain as notified.
Fire and Emergency New Zealand (S573)	S573.072	Settlement Zone	SETZ - R10	Support in part	Fire and Emergency support these activities provided the provisions in SETZ-R1 are amended.	Retain as notified.
Fire and Emergency New Zealand (S573)	S573.073	Settlement Zone	SETZ - R11	Support in part	Fire and Emergency support these activities provided the provisions in SETZ-R1 are amended.	Retain as notified.
Fire and Emergency New Zealand (S573)	S573.074	Settlement Zone	SETZ - R13	Support in part	Fire and Emergency support these activities provided the provisions in SETZ-R1 are amended.	Retain as notified.
Fire and Emergency New Zealand (S573)	S573.075	Settlement Zone	SETZ - R14	Support in part	Fire and Emergency support these activities provided the provisions in SETZ-R1 are amended.	Retain as notified.
Fire and Emergency New Zealand (S573)	S573.076	Settlement Zone	SETZ - R21	Oppose	Fire and Emergency do not support emergency service activities to be a restricted discretionary activity in the Settlement Zone. New fire stations may be necessary in order to continue to achieve emergency response time commitments in situations	New activity status sought SETZ - RX Emergency Service Activities Activity Status: Permitted

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					where development occurs, and populations change. In this regard it is noted that Fire and Emergency is not a requiring authority under section 166 of the RMA, and therefore does not have the ability to designate land for the purposes of fire stations. Provisions within the rules of the district plan are therefore the best way to facilitate the development of any new fire stations within the district as urban development progresses. Fire and Emergency request that emergency service facilities are included as a permitted activity in the Settlement Zone with performance standards and where this these are not met, a restricted discretionary activity status. In addition, fire stations have specific requirements with relation to setback distances and vehicle crossings.	
Fire and Emergency New Zealand (S573)	S573.077	Commercial and Mixed Use Zones	Commercial and Mixed Use Zones Policies	Support	Fire and Emergency supports CMUZ-O1, to the extent that the objective provides for commercial and other activities within the Commercial and Mixed Use Zone. Fire stations in commercial and mixed use zones are generally compatible wit the scale and amenity levels in these zones. The ability to construct and operate fire stations in locations which will enable reasonable response times to fire and other emergencies is paramount to the health, safety and wellbeing of people in the community. Fire stations therefore need to be strategically located within and throughout communities to maximise their coverage and response	Retained as notified

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Fire and Emergency New Zealand (S573)	S573.078	Commercial and Mixed Use Zones	CMUZ - P11	Support in part	Fire and Emergency seeks an amendment to this policy that ensures all land use activities in the Mixed Use Zone are adequately serviced, particularly in relation to reticulated water supply or an alternative method for firefighting purposes. This will give better effect to CMUZ-O1 and provides a better policy framework for the new standard sought in this zone relating to the requirement to provide water supply.	Amend policy as follows: CMUZ - P11 Ensure that developments are serviced with all required infrastructure in an effective and efficient manner. Where new infrastructure such as roads and three waters (wastewater, water supply with sufficient capacity for firefighting purposes., stormwater) is provided to service new commercial areas across multiple properties then this should be vested with the Council rather than be retained as private infrastructure.
Fire and Emergency New Zealand (S573)	S573.079	Commercial Zone	COMZ - R1	Support in part	Maximum height Fire and Emergency support that the maximum height is 12m and that the standard does not include hose drying towers at Emergency Service Facilities. External storage It is important to Fire and Emergency that screening of external storage areas as a visual mitigation will not obscure emergency or safety signage or obstruct access to emergency panels, hydrants, shut off valves or other emergency response facilities. Such mitigation should be constructed in a way to ensure the signs and facilities are visible/accessible for Fire and Emergency. Where this is not possible, mitigation should not be required. Fire and Emergency therefore seeks an amendment to COMZ-R1 (5) to provide for this.	Amend as follows 5. External storage is screened by a 1.8m fence or landscaping so that it is not visible from any adjoining residential zone boundary or adjoining public place. a. Screening shall not obscure emergency or safety signage or obstruct access to emergency panels, hydrants, shut-off valves, or other emergency response facilities.
Fire and Emergency New Zealand (S573)	S573.080	Commercial Zone	COMZ - R2	Support in part	Fire and Emergency support that each activity is amended to reflect COMZ-R1 changes.	Retain as notified
Fire and Emergency New Zealand (S573)	S573.081	Commercial Zone	COMZ - R3	Support in part	Fire and Emergency support that each activity is amended to reflect COMZ-R1 changes.	Retain as notified

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Fire and Emergency New Zealand (S573)	S573.082	Commercial Zone	COMZ - R4	Support in part	Fire and Emergency support that each activity is amended to reflect COMZ-R1 changes.	Retain as notified
Fire and Emergency New Zealand (S573)	S573.083	Commercial Zone	COMZ - R5	Support in part	Fire and Emergency support that each activity is amended to reflect COMZ-R1 changes.	Retain as notified
Fire and Emergency New Zealand (S573)	S573.084	Mixed Use Zone	MUZ - R1	Support	Maximum Fire and Emergency support that the maximum height is 12m and that the standard does not include hose drying towers at Emergency Service Facilities. External storage It is important to Fire and Emergency that screening of external storage areas as a visual mitigation will not obscure emergency or safety signage or obstruct access to emergency panels, hydrants, shut off valves or other emergency response facilities. Such mitigation should be constructed in a way to ensure the signs and facilities are visible/accessible for Fire and Emergency. Where this is not possible, mitigation should not be required. Fire and Emergency therefore seeks an amendment to MUZ-R1 (5) to provide for this.height	Amend as follows 5. External storage is screened by a 1.8m fence or landscaping so that it is not visible from any adjoining residential zone boundary or adjoining public place. a. Screening shall not obscure emergency or safety signage or obstruct access to emergency panels, hydrants, shut-off valves, or other emergency response facilities.
Fire and Emergency New Zealand (S573)	S573.085	Mixed Use Zone	MUZ - R2	Support in part	Fire and Emergency support the MUZ-R2 provided the amendments to R1 are made.	Retain as notified
Fire and Emergency New Zealand (S573)	S573.086	Mixed Use Zone	MUZ - R3	Oppose	Fire and Emergency oppose MUZ-R3 (1) which requires car parking and vehicle service access to be made at the side or rear of the building. This is not a practical option for fire appliances which in order to ensure quick response times occur, vehicle access needs to be at the front of the building for direct exit from the site to the road. Fire	Amendment south 6. Emergency Service activities are excluded from standards 1 - 5.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					appliances require quick manoeuvring on a site and if the access was to be to the rear or side this would result in additional maneuvering to exit. Fire and Emergency support the exclusion of emergency service activities from being included within the provisions.	
Fire and Emergency New Zealand (S573)	S573.087	Mixed Use Zone	MUZ - R4	Support	Fire and Emergency support these standards provided R1 is amended.	Retain as notified.
Fire and Emergency New Zealand (S573)	S573.088	Mixed Use Zone	MUZ - R5	Support	Fire and Emergency support these standards provided R1 is amended.	Retain as notified.
Fire and Emergency New Zealand (S573)	S573.089	Mixed Use Zone	MUZ - R6	Support	Fire and Emergency support these standards provided R1 is amended.	Retain as notified.
Fire and Emergency New Zealand (S573)	S573.090	Mixed Use Zone	MUZ - R8	Support	Fire and Emergency support these standards provided R1 is amended.	Retain as notified.
Fire and Emergency New Zealand (S573)	S573.091	Neighbourhoo d Centre Zone	NCZ - R1	Support in part	Floor areas Fire and Emergency support the standards set out in NCZ-R1. A maximum gross floor area of 250m2 will be appropriate for new fire stations. Heavy vehicles Fire and Emergency request that standard 6 is amended to exclude fire appliances from heavy vehicles stored on site as more than one fire appliance is likely to be located on site at any one time and any associated vehicles to assist Fire and Emergency.	Amendment sought: 6. No more than one heavy vehicle is stored on site excluding vehicles associated with emergency service activities
Fire and Emergency New Zealand (S573)	S573.092	Neighbourhoo d Centre Zone	NCZ - R2	Support in part	Fire and Emergency seeks an exemption for fire hose drying towers associated with emergency service facilities in order to appropriately provide for the operational requirements of Fire and Emergency. Whilst referred to as 'hose drying towers', they serve several	Amendment sought 2. Masts, poles, aerials and pou whenua must not exceed 7m in height; except hose drying towers up to 15m in height.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Fire and Emergency New Zealand	S573.093	Neighbourhoo d Centre Zone	NCZ - R4	Support in part	purposes being for hose drying, communications and training purposes on station. The frequency of hose drying towers being required at stations is dependent on locational and operational requirements of each station. These structures can be around 12 to 15 metres in height. Fire and Emergency considers that the inclusion of an exemption for hose drying towers better provides for the health and safety of the community by enabling the efficient functioning of Fire and Emergency in establishing and operating fire stations. Fire and Emergency support these standards provided that NCZ-R1 is	Retain as notified.
(S573) Fire and Emergency New Zealand (S573)	S573.094	Town Centre Zone	TCZ - R1	Support in part	amended. Fire and Emergency supports in part the standards with TCZ-R1, subject to an additional standard that requires commercial activities and buildings, community corrections activities and units to provide firefighting water supply where not connected to reticulated public water supply. It is noted there are cases that developments will not require subdivision consent, and therefore will not be subject to the water supply provisions of the SUB - Subdivision chapter, specifically, SUB-S3 that requires subdividers to provide a water supply. Therefore, a new standard is requested in the SETZ - Settlement Zone chapter to require the provision of firefighting water supply where development is not subject to subdivision. An additional assessment matter is also sought. Where water supply servicing	Amendment sought: 4. The ground floor façade of all buildings excluding Emergency Service Facilities with a Main Street Frontage must have 7. All new developments that will require a water supply must be connected to a public reticulated water supply, where one is available. 8. Where the new development will not be connected to a public reticulated water supply, or where an additional level of service is required that exceeds the level of service provided by the reticulated system, the developer must demonstrate how an alternative and satisfactory water supply can be provided to each lot. Note: The above does not replace regional rules which control the taking and use of groundwater and surface water. These rules must be complied with prior to the activity proceeding.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					requirements cannot be met, this will provide council discretion as to the extent an activity is able to achieve compliance with the NZ Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008.	Further advice and information about how an alternative and satisfactory firefighting water supply can be provided to a development can be obtained from Fire and Emergency New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008.
Fire and Emergency New Zealand (S573)	S573.095	Town Centre Zone	TCZ - R2	Support in part	Fire and Emergency support the standards provided the amendment is made to TCZ-R1.	Retain as notified.
Fire and Emergency New Zealand (S573)	S573.096	Town Centre Zone	TCZ - R3	Support in part	Fire and Emergency support the standards provided the amendment is made to TCZ-R1.	Retain as notified.
Fire and Emergency New Zealand (S573)	S573.097	Town Centre Zone	TCZ - R4	Support in part	Fire and Emergency support the standards provided the amendment is made to TCZ-R1.	Retain as notified.
Fire and Emergency New Zealand (S573)	S573.098	Town Centre Zone	TCZ - R5	Support in part	Fire and Emergency support the standards provided the amendment is made to TCZ-R1	Retain as notified.
Fire and Emergency New Zealand (S573)	S573.099	Town Centre Zone	TCZ - R6	Not Stated	Fire and Emergency oppose TCZ-R6 (1) which requires car parking and vehicle service access to be made at the side or rear of the building. This is not a practical option for fire appliances which in order to ensure quick response times occur, vehicle access needs to be at the front of the building for direct exit from the site to the road. Fire appliances require quick manoeuvring on a site and if the access was to be to the rear or side this would result in additional maneuvering to exit. Fire and Emergency support the exclusion of emergency service activities from being included within the provisions.	Amendment south Emergency Service activities are excluded from standards 1 - 5.
Fire and Emergency New Zealand (S573)	S573.100	Town Centre Zone	TCZ - R8	Support in part	Fire and Emergency support the standards provided the amendment is made to TCZ-R1.	Retain as notified.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Fire and Emergency New Zealand (S573)	S573.101	Town Centre Zone	TCZ - R10	Support in part	Fire and Emergency seeks an exemption for fire hose drying towers associated with emergency service facilities in order to appropriately provide for the operational requirements of Fire and Emergency. Whilst referred to as 'hose drying towers', they serve several purposes being for hose drying, communications and training purposes on station. The frequency of hose drying towers being required at stations is dependent on locational and operational requirements of each station. These structures can be around 12 to 15 metres in height. Fire and Emergency considers that the inclusion of an exemption for hose drying towers better provides for the health and safety of the community by enabling the efficient functioning of Fire and Emergency in establishing and operating fire stations.	Amendment sought 1. Masts, poles, aerials and pou whenua must not exceed 7m in height; except hose drying towers up to 15m in height.
Fire and Emergency New Zealand (S573)	S573.102	Industrial Zones	INZ - O1	Support in part	Fire and Emergency supports in part INZ-O2, to the extent that the objective provides for non-industrial activities within the Industrial Zones. However, Fire and Emergency considers that the objective should more suitably refer to 'non-industrial activities'. Fire stations in industrial zones are generally compatible with the scale and amenity levels in Industrial Zones. As noted previously, the ability to construct and operate fire stations in locations which will enable reasonable response times to fire and other emergencies is paramount the health, safety and wellbeing of people in the community. Fire stations therefore need to be strategically located within	Amend as follows: INZ-O2 To provide for the efficient and effective operation and development of industrial and non-industrial activities in the INZ - Industrial Zones in a manner that maintains a standard of amenity appropriate to these areas and does not compromise the amenity of adjoining areas.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					and throughout communities to maximise their coverage and response times so that they can efficiently and effectively respond to emergency call outs in a timely way, thus avoiding or mitigating the potential for adverse effects associated with fire hazard and other emergencies.	
Fire and Emergency New Zealand (S573)	S573.103	Industrial Zones	INZ - O2	Support	Fire and Emergency support that development maximises the efficient use of existing infrastructure and where such infrastructure does not exist, is developed to the standards required by the Council and Te Tao o Poutini Plan.	Retain as notified.
Fire and Emergency New Zealand (S573)	S573.104	General Industrial Zone	GIZ - R1	Support in part	Fire and Emergency supports in part GIZ-R1, subject to the inclusion of a new standard that requires these activities to provide a firefighting water supply which covers GIZ R2 - R8. It is noted that there are cases that development in the General Industrial Zone will not require subdivision, and therefore will not be subject to the water supply provisions of the SUB - Subdivision chapter, specifically, SUB - S3 that requires subdividers to provide a water supply. Therefore, a new standard is requested in the GIZ - General Industrial Zone chapter to require the provision of firefighting water supply where development is not subject to subdivision. An additional assessment matter is also sought. Where water supply servicing requirements cannot be met, this will provide council discretion as to the extent an activity is able to achieve compliance with the NZ Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008.	Add to GIZ-R1 GIZ - R1 Industrial Activities and Industrial Buildings Activity Status Permitted Where: 1 2 10. All new developments that will require a water supply must be connected to a public reticulated woraterwater supply, where one is available. 11. Where the new development will not be connected to a public reticulated water supply, or where an additional level of service is required that exceeds the level of service provided by the reticulated system, the developer must demonstrate how an alternative and satisfactory water supply can be provided to each lot. Note: The above does not replace regional reules which control the taking and use of groundwater and surface water. These rules must be complied with prior to the activity proceeding. Further advice and information about how an alternative and satisfactory firefighting water supply can be provided to a development can be obtained from Fire and Emergency New Zealand Fire Service

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008.
Fire and Emergency New Zealand (S573)	S573.105	General Industrial Zone	GIZ - R2	Support in part	Fire and Emergency support in part these activities provided the amendments are made above to GIZ-R1 to include firefighting water supply.	Retain as notified.
Fire and Emergency New Zealand (S573)	S573.106	General Industrial Zone	GIZ - R3	Support in part	Fire and Emergency support in part these activities provided the amendments are made above to GIZ-R1 to include firefighting water supply.	Retain as notified.
Fire and Emergency New Zealand (S573)	S573.107	General Industrial Zone	GIZ - R4	Support in part	Fire and Emergency support in part these activities provided the amendments are made above to GIZ-R1 to include firefighting water supply.	Retain as notified.
Fire and Emergency New Zealand (S573)	S573.108	General Industrial Zone	GIZ - R5	Support in part	Fire and Emergency support in part these activities provided the amendments are made above to GIZ-R1 to include firefighting water supply.	Retain as notified.
Fire and Emergency New Zealand (S573)	S573.109	General Industrial Zone	GIZ - R6	Support	Fire and Emergency support this activity provided the amendments to GIZ-R1 are undertaken.	Retain as notified.
Fire and Emergency New Zealand (S573)	S573.110	Light Industrial Zone Rules	LIZ - R1	Not Stated	Fire and Emergency supports in part LIZ-R1, subject to the inclusion of a new standard that requires these activities to provide a firefighting water supply which covers LIZ R2 - R8. It is noted that there are cases that development in the General Industrial Zone will not require subdivision, and therefore will not be subject to the water supply provisions of the SUB - Subdivision chapter, specifically, SUB - S3 that requires subdividers to provide a water supply. Therefore, a new standard is requested in the LIZ - General Industrial Zone chapter to require the provision of firefighting water supply where development is not subject to subdivision. An additional assessment matter is also	LIZ - R1 Industrial Activities and Industrial Buildings Activity Status Permitted Where: 1 2 10. All new developments that will require a water supply must be connected to a public reticulated water supply, where one is available. 11. Where the new development will not be connected to a public reticulated water supply, or where an additional level of service is required that exceeds the level of service provided by the reticulated system, the developer must demonstrate how an alternative and satisfactory water supply can be provided to each lot. Note: The above does not replace regional reules which control the taking and use of groundwater and surface water. These rules must be complied with prior to the

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					sought. Where water supply servicing requirements cannot be met, this will provide council discretion as to the extent an activity is able to achieve compliance with the NZ Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008.	activity proceeding. Further advice and information about how an alternative and satisfactory firefighting water supply can be provided to a development can be obtained from Fire and Emergency New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008.
Fire and Emergency New Zealand (S573)	S573.111	Light Industrial Zone Rules	LIZ - R2	Support in part	Fire and Emergency support activities LIZ - R2, R3, R5, R7 and R8 provided the amendments to LIZ-R1 are made.	Retained as notified.
Fire and Emergency New Zealand (S573)	S573.112	Light Industrial Zone Rules	LIZ - R4	Support		Retain as notified
Foodstuffs (South Island) Properties Limited and Foodstuffs South Island Limited (S464)	S464.001	Commercial and Mixed Use Zones	Commercial and Mixed Use Zones	Amend	The majority of Foodstuffs' supermarkets are located within the Commercial, Neighbourhood or Town Centre Zones. Many of these supermarkets are longestablished in these areas. Currently the plan provisions, as notified, do not enable supermarket redevelopment in line with the functional and operational needs of supermarkets.	Include Plan provisions that specifically provide for supermarkets.
Foodstuffs (South Island) Properties Limited and Foodstuffs South Island Limited (S464)	S464.002	Town Centre Zone	Town Centre Zone Rules	Support	TCZs should be enabling of extensions and redevelopment for existing commercial activities, such as supermarkets.	Amend provisions to be more enabling of extensions and redevelopment of supermarkets.
Foodstuffs (South Island) Properties Limited and Foodstuffs South Island Limited (S464)	S464.003	Appendix Three: Design Guidelines	Appendix Three: Design Guidelines	Amend	These guidelines do not recognise the functional and operational need of supermarkets to locate in townships. The guidelines also do not explicitly recognise the alternative urban design methods, as outlined in the submissi0on, that achieve quality design outcomes and should. Foodstuffs supermarkets are also already established on the West Coast.	That supermarkets be exempt from the Town Centre Design Guidelines

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Foodstuffs (South Island) Properties Limited and Foodstuffs South Island Limited (S464)	S464.004	Settlement Zone	Rules	Amend	Foodstuffs seeks explicit recognition that these supermarkets form a necessary part of the SETZ.	Provide specific provisions for supermarkets in the zone
Foodstuffs (South Island) Properties Limited and Foodstuffs South Island Limited (S464)	S464.005	Transport	Transport	Amend	Provisions in the Transport Chapter have a heavy emphasis on amenity factors, which is inappropriate and has the potential to stifle the efficient and effective use and operation of the transport network	Remove the emphasis n amenity within the transport chapter.
Foodstuffs (South Island) Properties Limited and Foodstuffs South Island Limited (S464)	S464.006	Interpretation	Definitions	Amend	Provide a new definition for supermarkets.	Supermarket: A retail activity that uses land and/or buildings for displaying or offering a comprehensive range food, beverage and other disposable goods such as fresh meat and produce; chilled, frozen, packaged, canned and bottled foodstuffs and beverages; and housekeeping and other personal items for sale to the public.
Foodstuffs (South Island) Properties Limited and Foodstuffs South Island Limited (S464)	S464.007	Coastal Environment	Coastal Environment Rules	Amend	the Coastal Environment Overlay undermines proposed zonings because SETZs are usually applied to service towns, not natural or low-intensity rural areas.	Exclude Settlement Zone areas from Coastal Environment provisions.
Foodstuffs (South Island) Properties Limited and Foodstuffs South Island Limited (S464)	S464.008	Natural Hazards	Flood Severe Overlay and Flood Susceptibility Overlay	Amend	Breaches of the Flood Susceptibility Overlay provisions should be non-notified if it does not have off-site effects on the environment;	Include a non-notification clause in relation to the flood susceptibility overlay where there are no off-site effects on the environment.
Foodstuffs (South Island) Properties Limited and Foodstuffs South	S464.009	Signs	SIGN - R17	Amend	Rule SIGN-R17 is too restrictive in prescribing the lesser of 3m2 or 10% of the building façade as the sign size limit in the Commercial and Mixed Use Zones. These zones are high-activity commercial	Increase the maximum size signage per activity.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Island Limited (S464)					areas where retail activity is commonplace. A supermarket, as an essential service provider, can easily absorb signage greater than 3m2 per sign.	
Foodstuffs (South Island) Properties Limited and Foodstuffs South Island Limited (S464)	S464.011	Commercial and Mixed Use Zones	Commercial and Mixed Use Zones	Support in part	Express provisions are needed for supermarkets. These should recognise their functional and operational needs and allow for design mitigation, rather than operation minimisation.	Provide specific provisions for supermarkerts
Foodstuffs (South Island) Properties Limited and Foodstuffs South Island Limited (S464)	S464.012	Commercial and Mixed Use Zones	CMUZ - O1	Amend	Provisions within the CMUZ chapter should reflect existing activities and their effects. Rather than restricting commercial activities, the provisions should also recognise that adverse effects can be managed through retention techniques, such as fencing, glazing and soundproofing. Residential activities within commercial areas should have a lower expectation of amenity.	To maintain and enhance the character and amenity values of commercial areas and town centres in a way that enables commercial and other activities to support the local community and visitors, while minimising adverse effects on amenity within and adjoining the commercial areas managing amenity effects on adjoining sensitive activities.
Foodstuffs (South Island) Properties Limited and Foodstuffs South Island Limited (S464)	S464.013	Commercial and Mixed Use Zones	CMUZ - P4	Amend	Foodstuffs supports good quality design outcomes, but these must fit within the functional and operational needs of supermarkets.	A. New development in CMUZ - Commercial and Mixed Use Zones should have quality design outcomes and is expected to which: Acknowledge, and respond to, the context of the site and the surrounding environment; Ensure the bulk, form and siting of new buildings maintains and enhances the quality of the environment; Provide a quality street frontage with visual interest and connection with the street; and Ensure visual effects from car parking areas are minimised Enable and provide for operational and functional requirements.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Foodstuffs (South Island) Properties Limited and Foodstuffs South Island Limited (S464)	S464.014	Commercial and Mixed Use Zones	CMUZ - P6	Oppose in part		Recognise the substantial investment by communities in town centres and their infrastructure by ensuring that any new CMUZ - Commercial and Mixed Use Zones are located where they support the function of town centres-rather than pulling activity away from the centre.
Foodstuffs (South Island) Properties Limited and Foodstuffs South Island Limited (S464)	S464.015	Commercial and Mixed Use Zones	CMUZ - P7	Amend	Supermarkets provide an essential service and are particularly important in natural hazards. Design techniques can mitigate the impact of supermarkets on natural hazard risk, wāhi tapu and SNAs and this should be assessed via a resource consent process.	New CMUZ - Commercial and Mixed Use Zones should not be restricted located in areas subject to significant risks from natural hazards, in wāhi tapu or significant natural areas.
Foodstuffs (South Island) Properties Limited and Foodstuffs South Island Limited (S464)	S464.016	Commercial and Mixed Use Zones	CMUZ - P13	Amend	The avoid policy is unnecessarily restrictive and does not reflect the existing townships, nor does it enable supermarkets to locate where they have a functional and operational need.	Activities in the COMZ - Commercial, MUZ - Mixed-Use and NCZ - Neighbourhood Centre Zones should: a. Meet performance standards on development and land use that maintain or enhance the amenity of the commercial areas and do not create significant adverse effects beyond the boundaries of these areas, particularly in respect of residential areas; b. Provide safe urban design (including pedestrian and vehicle safety); and c. Avoid the fragmentation Encourage compact urban form of town centres.
Foodstuffs (South Island) Properties Limited and Foodstuffs South Island Limited (S464)	S464.017	Commercial and Mixed Use Zones	CMUZ - P15	Oppose in part	Customers of supermarkets often require vehicles to transport their groceries, so supermarkets are not reliant on pedestrian movement. The National Planning Standards definition for the Town Centre Zone (TCZ) describes the TCZ as: Areas used predominantly for: in smaller urban areas, a range of commercial, community, recreational and	a.Activities within the TCZ - Town Centre Zones should: Maintain or enhance natural and historic features and built form; Adaptively reuse existing heritage buildings where practicable; Recognise and implement good urban design; Provide for low-speed vehicle movement; Allow for noise associated with commercial

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					residential activities. in larger urban areas, a range of commercial, community, recreational and residential activities that service the needs of the immediate and neighbouring suburbs. The TCZ should therefore provide for a range of commercial activities, not solely ones reliant on pedestrian movement or fine grain retail.	activities including bars and restaurants; Provide for commercial signs associated with onsite activities; Provide a high-quality pedestrian environment, with pedestrian oriented street layout; Have consolidated on-street parking; Have efficient wastewater, water supply and stormwater infrastructure that maximises the use of existing services; Allow for a range of transport options; and Have new buildings built to a high quality design standard up to the street frontage and predominantly with verandahs over the footpath; and Be activities reliant on pedestrian movement.
Foodstuffs (South Island) Properties Limited and Foodstuffs South Island Limited (S464)	S464.018	Commercial and Mixed Use Zones	CMUZ - PREC1 - P5	Amend		a. Require high quality design outcomes in the TCZ - PREC1 - Greymouth/Māwhera Town Centre Precinct which adhere to the Greymouth/Māwhera Town Centre Design Guidelines. In particular, new development and additions and alterations to existing buildings are expected to: Acknowledge, and respond to, the context of the site and the surrounding environment; Create visual interest and be in keeping with streetscape values; Address Poutini Ngāi Tahu and historic heritage values and design elements; Create a vibrant, active pedestrian environment; Take into account sustainable building design and Crime Prevention through Environmental Design (CPTED) principles; Utilise the Greymouth Pounamu and Māori

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						Heritage paint palette on building frontages; and Ensure continuous verandah coverage on the Main Street Frontage of the TCZ - PREC1 - Greymouth/Māwhera Town Centre Precinct-; and Take into account the operational and functional needs of activities.
Foodstuffs (South Island) Properties Limited and Foodstuffs South Island Limited (S464)	S464.019	Commercial and Mixed Use Zones	Infrastructure in Commercial and Mixed Use Zones	Amend	Express provisions are needed for supermarkets that recognise their functional and operational needs and allow for design mitigation, rather than minimisation, after CMUZ-PREC2-P9 Town Centre Zone - Hokitika Town Centre Precinct Policies	New provision:Provide for the operational and functional needs of existing anchor tenants, such as supermarkets.
Foodstuffs (South Island) Properties Limited and Foodstuffs South Island Limited (S464)	S464.020	Commercial and Mixed Use Zones	Additional Policies for Town Centre Precincts	Amend	Express provisions are needed for supermarkets that recognise their functional and operational needs and allow for design mitigation, rather than minimisation, after CMUZ-PREC3-P12 Town Centre Zone - Westport/Kawatiri Town Centre Precinct Policies	New provision:Provide for the operational and functional needs of existing anchor tenants, such as supermarkets.
Foodstuffs (South Island) Properties Limited and Foodstuffs South Island Limited (S464)	S464.021	Commercial and Mixed Use Zones	Additional Policies for Town Centre Precincts	Amend	Express provisions are needed for supermarkets that recognise their functional and operational needs and allow for design mitigation, rather than minimisation, after CMUZ-PREC4-P15 Town Centre Zone - Reefton Town Centre Precinct Policies	New provision:Provide for the operational and functional needs of existing anchor tenants, such as supermarkets.
Foodstuffs (South Island) Properties Limited and Foodstuffs South Island Limited (S464)	S464.022	Commercial Zone	Overview	Support	Foodstuffs supports the overview of the Commercial Zone (COMZ), particularly because it recognises that commercial activities are often accessed by car.	Retain overview
Foodstuffs (South Island) Properties Limited and	S464.023	Commercial Zone	COMZ - R1	Amend	Applying discretionary status to breaches of urban design and landscaping conditions is excessive. Restricted	Activity status where compliance not achieved: Restricted Discretionary where standards 3 , 4 , 5 and 6 are not

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Foodstuffs South Island Limited (S464)					discretionary status is more appropriate and allows urban design mitigations to still be considered.	complied with. Discretionary where standards 1- 24 are not complied with.
Foodstuffs (South Island) Properties Limited and Foodstuffs South Island Limited (S464)	S464.024	Commercial Zone	COMZ - R8	Amend	Supermarkets have a built form usually requiring a long building length. This is necessary for supermarkets to store goods and offer a range of products to consumers.	1. Where: The maximum height is 15m; Maximum building length abutting a residential zone is 35m, excluding expansions to or redevelopment of existing supermarkets; and Any building or structure is set back 3m from any Residential Zone or Open Space Zone.
Foodstuffs (South Island) Properties Limited and Foodstuffs South Island Limited (S464)	S464.025	Neighbourhoo d Centre Zone	NCZ - R1	Amend	No supermarket is likely to be able to operate with a floor space of 250m2 or less. The activity requires much greater floor space and currently exists with floor levels of at least 1000m2 in Neighbourhood Centre Zones.	Where: 1. Community Facilities, Emergency Service Facilities, retail and office activities are a maximum of 250m2 gross floor area per activity, or 1000m2 per supermarket, provided; 2. The activity does not include: i. Drive through restaurants; ii. Service stations; iii. Motor vehicle sales; iv. Yard-based retail activities; v. Trade retail and trade suppliers; or vi. Bars/taverns; 3. The maximum height above ground level is 10 metres except that this standard does not apply to hose drying towers at Emergency Service Facilities; 4. External storage is screened by a 1.8m fence or landscaping so that it is not visible from any adjoining residential zone boundary or adjoining public place; 5. Maximum site coverage is 60%; 6. No more than one heavy vehicle is stored on the site;

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						7. Activities other than Emergency Services shall be limited to the following hours of operation: i. 6am - 11pm weekdays; and ii. 7am - 10 pm weekends and public holidays; except where a. The entire activity is located within a building; and b. There are no visitors, customers or deliveries outside the above hours. 8. The maximum building length is 20m where this abuts a RESZ - Residential Zone; 9. Any building or structure is set back i. 2m from a RESZ - Residential Zone or OSRZ - Open Space and Recreation Zone boundary; ii. 3m from the road boundary; or iii. For sites with frontage to two roads in the NCZ - Neighbourhood Centre Zone: a. 3m on one road boundary; and b. 1.5m on the other road boundary; 10. A landscape buffer of 1m width must be provided along the frontage between the street and any car parking, loading or service areas which are visible from the street frontage. This rule excludes access points; 11. No building shall protrude beyond
Foodstuffs (South Island) Properties Limited and Foodstuffs South Island Limited (S464)	S464.026	Neighbourhoo d Centre Zone	NCZ - R9	Amend	As above.	Where: 1. The gross floor area is greater than 250m2 per activity or 1000m2 per supermarket, but all other Performance Standards for 1- 8 for Rule TCZ - R1 are complied with. Discretion is restricted to: Design and location of buildings; Design and location of parking, loading and access areas; and

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						Landscape measures.
Foodstuffs (South Island) Properties Limited and Foodstuffs South Island Limited (S464)	S464.027	Neighbourhoo d Centre Zone	NCZ - R11	Oppose in part	The rules as notified effectively make all supermarkets a noncomplying activity due to the gross floor area restrictions. This is inappropriate given that supermarkets currently exist in the NCZ and are a common feature of any township.	Where: Retail and office activities are a maximum of 250m2 gross floor area per activity, excluding expansions to or redevelopment of supermarkets; The activity does not include: Drive through restaurants; Service stations; Yard-based retail activities; Motor vehicle sales; or Trade retail and trade suppliers.
Foodstuffs (South Island) Properties Limited and Foodstuffs South Island Limited (S464)	S464.028	Town Centre Zone	Overview	Amend		Amend to Read: The TCZ - Town Centre Zone is found in the four main town centres of Reefton, Greymouth/Māwhera, Westport/Kawatiri and Hokitika. There are common policies and rules across the TCZ - Town Centre Zone, however each town centre has a Precinct where specific additional policies and rules apply.
						The four centres are generally characterised by 2-3 storey buildings located up to the street with verandahs and retail display windows. These town centres are pedestrian oriented and parking is available on the street. Residential living above ground floor and mixed use activities are provided for A supermarket is present and occupies town centres as an anchor tenant. Existing supermarkets have specific operational and functional needs, including, but not limited to, large

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						operation, increased vehicle access and larger built form. High quality design of supermarkets is achieved through methods that do not disrupt their operational and functional needs such as building recesses, material/colour variation or landscaping.
						The location of the Hokitika, Greymouth/Māwhera and Westport/Kawatiri town centres on the coast and adjacent to large rivers, means parts of the town centres are subject to risk from existing and future flood and coastal inundation. Te Tai o Poutini Plan acknowledges this is an existing risk and enables development within the TCZ - Town Centre Zone and MUZ - Mixed Use Zone that responds to and manages the risk. However, it is also acknowledged that over time a movement away from the most hazardous locations is desired, and this is reflected in other parts of the Te Tai o Poutini Plan through the NH - Natural Hazards provisions.
Foodstuffs (South Island) Properties Limited and Foodstuffs South Island Limited (S464)	S464.029	Town Centre Zone	TCZ - R1	Amend	Current supermarkets in the TCZ do not achieve the conditions of TCZ-R1, despite existing in the TCZ already. A TCZ may be appropriate for these areas, but the pTTPP rules do not give effect to the TCZ described in the National Planning Standards.	Where: 1. Any building is located: a. On the front boundary of the site; b. With no setback from the street boundary, except that a recess of up to 0.5m within the facade of the building is permitted; 2. Any building is setback a minimum of 3m from any RESZ - Residential Zone boundary; 3. All external storage is screened by a

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						1.8m fence or landscaping so it is not visible from any adjoining residential zone boundary or any adjoining public space; 4. The ground floor facade of all buildings with a Main Street Frontage must have: a. 50% of the facade devoted to display windows or 75% of its height for at least 50% of the ground floor building frontage; and b. One public entrance with glazing comprising at least 40% of the doors; except that c. Any Heritage Building in Schedule One is exempt from this requirement. 5. No building shall create a featureless facade or blank wall on a Main Street Frontage at ground floor level wider than 3m; 6. No building shall project beyond a building envelope 7. Existing supermarkets are not subject to conditions 1, 4 and 5 of this rule.
Foodstuffs (South Island) Properties Limited and Foodstuffs South Island Limited (S464)	S464.030	Town Centre Zone	TCZ - R2	Amend	As above.	3. Where: All performance standards from Rule TCZ - R1 are complied with; Any commercial activity on a Main Street Frontage does not include: Motor vehicle sales yards; Service stations; Yard based retail; Trade retail and trade suppliers; Drive through restaurants. Town Centre Zone TCZ-R2 Amend As above. Where: All performance standards from Rule TCZ - R1 are complied with; Any commercial activity on a Main Street

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						Frontage does not include: Motor vehicle sales yards; Service stations; Yard based retail; Trade retail and trade suppliers; Drive through restaurants. The maximum height above ground level is 12 metres except that hose drying towers at an Emergency Service Facility are exempt from this standard; Every building with a Main Street Frontage must erect a cantilevered continuous verandah to cover the full width of the footpath except that this does not apply to Heritage Buildings identified in Schedule One; and New buildings and additions and alterations to any Main Street Frontage façade must demonstrate that they meet the Hokitika Town Centre Urban Design Guidelines. Existing supermarkets are not subject to conditions 4 and 5 of this rule.
Foodstuffs (South Island) Properties Limited and Foodstuffs South Island Limited (S464)	S464.031	Town Centre Zone	TCZ - R3	Amend	As above.	1. Where: All performance standards from Rule TCZ - R1 are complied with; The maximum height above ground level is 20 metres; Every building with a Main Street Frontage must erect a cantilevered continuous verandah (with no decorative poles) to extend from the shop frontage to be 400mm inside the kerbline. This requirement for a verandah does not apply to Historic Heritage buildings identified in Schedule One.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						Advice Note: The verandah shall extend from the shop frontage to be 400mm inside the kerbline. The verandah, if on a corner, shall be splayed so as to be 400mm back from the kerbline. When designing new buildings in Greymouth/Māwhera Town Centre developers are encouraged to use the Greymouth/Māwhera Town Centre and Mixed Use Urban Design Guidelines. Existing supermarkets are not subject to condition 3 of this rule.
Foodstuffs (South Island) Properties Limited and Foodstuffs South Island Limited (S464)	S464.032	Town Centre Zone	TCZ - R15	Amend	Applying a non-complying status effectively makes all supermarkets a non-complying activity with the TCZ. This is inappropriate given the current and long-established existence of supermarkets in these areas. It also does not give effect to the National Planning Standards descriptions of TCZs.	Activity status where compliance not achieved: Non-complying Discretionary
Foodstuffs (South Island) Properties Limited and Foodstuffs South Island Limited (S464)	S464.033	Town Centre Zone	TCZ - R18	Amend	As above.	Activity Status Non-complying Discretionary
Foodstuffs (South Island) Properties Limited and Foodstuffs South Island Limited (S464)	S464.034	Rural Zones	Overview	Amend	Recognition of the existing environment is needed. Also, the Rural Zones should enable any activity that has a functional and operational need to occur in rural environments. Such activities will include ancillary activities such as supermarkets, which enable people to live and work in the rural space.	Amend to Read: Rural areas represent the majority of private land within the West Coast/Te Tai o Poutini. They are working environments - with farming, mining, tourism, horticulture, and forestry being undertaken alongside a number of smaller industries. They contain native bush, wetlands, renewable electricity generation sites and national grid infrastructure. Rural areas are also residential environments - characterised by a lower levels of built development and greater

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						separation distance from neighbours. The rural area is characterised by its open vistas and natural features that are of importance to the wider community. Components of the rural area include the coastline, waterbodies, vegetation and the absence of builtup areas. Small settlements and townships are a significant feature within the rural areas of the West Coast/Te Tai o Poutini, with numerous coastal and inland settlements around the districts. These settlements include existing commercial activities, such as supermarkets, that service not only the township, but the surrounding rural environment as well. Some of these settlements were once much larger, due to past mining and forestry activities which supported the settlements population. Some are expanding, mainly due to the increase in tourism activities or their proximity to the main centres meaning they are becoming more like commuter areas.
Foodstuffs (South Island) Properties Limited and Foodstuffs South Island Limited (S464)	S464.035	Settlement Zone	SETZ - PREC2 - Settlement Centre Precinc	Support	Foodstuffs supports the description of SETZ-PEC2 as a developing area with changing character and a need for growth.	Retain description of SETZ-PREC2
Foodstuffs (South Island) Properties Limited and Foodstuffs South Island Limited (S464)	S464.036	Settlement Zone	SETZ - R2	Amend	Supermarkets have a functional and operational need for different, more flexible, urban design elements to achieve quality design outcomes.	Where: 1. The maximum height above ground level for buildings is: i. 10m for residential buildings and Emergency Service Facilities and 7m for accessory buildings; except ii. No building, structure or tree shall

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Submitter		Plan Section	Provision	Position	Reasons	protrude into the Airport Approach Path of any airport or aerodrome identified on the planning maps and as described in Appendix Nine; iii. 7m for buildings in the SETZ - PREC3 - Coastal Settlement Precinct; and iv. 12m for buildings in the SETZ - PREC2 - Settlement Centre Precinct and existing supermarkets; 2. The maximum site coverage is: 40%; except Maximum site coverage is 60% in the SETZ - PREC2 - Settlement Centre Precinct The maximum gross ground floor area of any one building Is 350m2; except In the SETZ - PREC3 - Coastal Settlement Precinct the gross ground floor area is a maximum of 200m2 total for all buildings on the site Buildings are setback from boundaries as
						follows: 5m from the road and any GRUZ - General Rural or INZ Industrial Zone boundary and 1m from internal boundaries; except ii. In the SETZ - PREC4 - Rural Residential Precinct all buildings are setback 10m from road boundaries, residential buildings are setback 10m from the internal boundaries and non-residential buildings are setback 5m from internal boundaries; iii. In the SETZ - PREC2 - Settlement Centre Precinct no setback from the road boundary is required where there is a verandah provided over an adjacent footpath. In the Kumara Junction Developments area: Existing supermarkets in Settlement Zones are not subject to condition 2, 3,

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						and 4 of this rule.
Foodstuffs (South Island) Properties Limited and Foodstuffs South Island Limited (S464)	S464.037	Settlement Zone	SETZ - R13	Amend	Supermarkets will almost always breach conditions 4, 6, 7 or 8 despite being an existing activity in the SETZ. A restricted discretionary activity status is more appropriate where discretion would be limited to urban design and operational matters.	Activity status where compliance not achieved: Discretionary Restricted Discretionary
Foodstuffs (South Island) Properties Limited and Foodstuffs South Island Limited (S464)	S464.038	Settlement Zone	SETZ - R26	Amend	As above	a. Activity Status Discretionary Restricted Discretionary Discretion is restricted to: Design and location of buildings; Size and height of buildings; Vehicle movements and access; Design and location of parking and access; Landscape measures; Any requirement for financial contributions; Hours of operation; and Acoustic and noise management requirements
Foodstuffs (South Island) Properties Limited and Foodstuffs South Island Limited (S464)	S464.039	Transport	TRN - 01	Support	Foodstuffs support the recognition of the important role road infrastructure plays in supporting the West Coast and the need to protect the use of this infrastructure.	Retain recognition of the important role road infrastructure plays in supporting the West Coast and the need to protect the use of this infrastructure.
Foodstuffs (South Island) Properties Limited and Foodstuffs South Island Limited (S464)	S464.040	Transport	TRN - O2	Oppose	Amenity effects have not previously been considered in West Coast district plans. Further, restrictions on the use of roads will decrease economic activity.	To manage the effects of land transport infrastructure on the character, landscape and amenity of the towns, settlements and rural areas and minimise adverse effects on the environment.
(0404)						Or, alternatively, amend as follows: To provide for the safe and efficient operation of land transport infrastructure, while managing adverse effects on the surrounding

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						environment.
Foodstuffs (South Island) Properties Limited and Foodstuffs South Island Limited (S464)	S464.041	Transport	TRN - 03	Not Stated	As above in relation to amenity effects.	To enable accessibility, safety and connectivity of land transport infrastructure and consider the amenity of for all transport users, including pedestrians and cyclists.
Foodstuffs (South Island) Properties Limited and Foodstuffs South Island Limited (S464)	S464.042	Transport	TRN - P1	Not Stated	As above in relation to amenity effects.	The road and rail networks shall; Be maintained or enhanced to provide safe and efficient transportation; Consider the needs of all transport users and modes of transport; and Minimise effects on adjoining properties including the impacts of vibration, noise and glare.
Foodstuffs (South Island) Properties Limited and Foodstuffs South Island Limited (S464)	S464.043	Natural Hazards	NHR12	Amend	Public or limited notification is not necessary or appropriate for an assessment of whether the natural hazard mitigation is effective.	Discretion is restricted to: The effects of natural hazards on people and property; The location and design of proposed sites, buildings, vehicle access, earthworks and infrastructure in relation to natural hazard risk; Any freeboard requirements to be included; The management of vegetation or other natural features to mitigate natural hazard risk; The timing, location, scale and nature of any earthworks in relation to natural hazard risk; The potential for the proposal to exacerbate natural hazard risk, including transferring risk to any other site; The functional or operational need to locate in these areas; and Any adverse effects on the environment of any proposed natural hazard mitigation

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						measures. Any application arising from this rule shall be non-notified.
Foodstuffs (South Island) Properties Limited and Foodstuffs South Island Limited (S464)	S464.044	Natural Hazards	NHR26	Amend	Additions and alterations to and new commercial buildings can be appropriately managed through restricted discretionary matters limited to those set out in NHR12.	Activity Status Discretionary Restricted discretionary Refer to matters of discretion and notification status in NHR12.
Foodstuffs (South Island) Properties Limited and Foodstuffs South Island Limited (S464)	S464.045	Natural Hazards	NHR51	Amend	Restricted discretionary status is more appropriate, with matters of discretion limited to those in NHR12.	Activity Status Discretionary Restricted discretionary Refer to matters of discretion and notification status in NHR12.
Foodstuffs (South Island) Properties Limited and Foodstuffs South Island Limited (S464)	S464.046	Natural Hazards	NHR53	Amend	Restricted discretionary status is more appropriate, with matters of discretion limited to those in NHR12.	Activity Status Discretionary Restricted discretionary Refer to matters of discretion and notification status in NHR12.
Foodstuffs (South Island) Properties Limited and Foodstuffs South Island Limited (S464)	S464.047	Coastal Environment	CE - R4	Oppose in part	Applying the very restrictive gross floor area limit undermines the Settlement Zone policy thrust, particularly in settlements identified for future growth and commercial activity such as supermarkets.	i. Activity Status Permitted Where: These are not located within: An Outstanding Natural Landscape identified in Schedule Five; An Outstanding Natural Feature identified in Schedule Six; An area of High Coastal Natural Character identified in Schedule Seven and subject to Rule CE - R5; An area of Outstanding Coastal Natural Character identified in Schedule Eight; and These: Comply with the rules for buildings and structures within the relevant zone, except that within the GRUZ - General Rural Zone, RLZ - Rural Lifestyle and SETZ - Settlement Zone: Maximum height is 7m for new

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						buildings; No height limits apply where this is replacement of a lawfully established building with another building of the same height, in the same location; and . The gross ground floor area is: I. A maximum of 200m2 per building for new buildings; II. No maximum area where this is the replacement of a lawfully established building with another building of the same ground floor area, in the same location; or This rule does not apply to existing supermarkets within a centre.
Foodstuffs (South Island) Properties Limited and Foodstuffs South Island Limited (S464)	S464.048	Noise	NOISE - O2	Support	Recognising existing and permitted future noise generating noise activities is important. Foodstuffs' operations are often long-established activities that are known to produce noise effects. Persons living adjacent or nearby should be aware of this.	Retain as notified
Foodstuffs (South Island) Properties Limited and Foodstuffs South Island Limited (S464)	S464.049	Noise	NOISE - R2	Support in part	Existing and normal noise activities should be recognised across all zones for consistency. This change also reflects submissions made on transport amenity effects above. Foodstuffs supports conditions 5 and 7 (as amended) as they recognise the functional and operational needs of supermarkets to utilise emergency generators and onsite vehicle movements, without restrictive noise limits.	Where the following activities are exempted from meeting Zone noise standards: 5. The use of generators and mobile equipment (including vehicles) for emergency purposes, including testing and maintenance not exceeding 2 weeks in duration, where they are operated by emergency services or lifeline utilities; 7. Vehicles being driven on a road (within the meaning of Section 2(1) of the Transport Act 1998), or within a site as part of or compatible with a normal

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						residential activity expected for that zone;
Foodstuffs (South Island) Properties Limited and Foodstuffs South Island Limited (S464)	S464.050	Signs	SIGN - O1	Support	Foodstuffs supports the recognition of the contribution signs make to businesses.	Retain as notified
Foodstuffs (South Island) Properties Limited and Foodstuffs South Island Limited (S464)	S464.051	Signs	SIGN - P2	Amend	Adverse visual and amenity effects can result from some signage, including where signs are visible from, but not directed at the more sensitive areas. A more appropriate limit is on unacceptable adverse effects.	Ensure the landscape, natural character and amenity values of residential areas, settlements, rural areas, open space and outstanding natural landscapes and features are protected from unacceptable adverse visual and amenity effects from large areas or numbers of signs.
Foodstuffs (South Island) Properties Limited and Foodstuffs South Island Limited (S464)	S464.052	Signs	SIGN - R17	Oppose in part	Signage is expected in the commercial environment and generally does not cause significant adverse effects. There is also a functional and operational need for reasonably sized signage in these areas, to efficiently direct customers.	1. Where: Signs must relate to an activity occurring on the site; Signs are not directed towards residential or rural areas where practicable ; Signs attached to the structure or face of the building must be a maximum of 10% of the area of the building facade or 3m2, whichever is the lessor; and All performance standards for Rule SIGN - R1 are complied with.
Foodstuffs (South Island) Properties Limited and Foodstuffs South Island Limited (S464)	S464.053	Appendix Three: Design Guidelines	Hokitika Town Centre Urban Design Guidelines	Amend	The precise requirements set out in the design guidelines are not readily compatible with the functional and operational need of supermarkets. Supermarkets achieve good quality design outcomes through other measures, as suggested in the proposed text.	These guidelines are not intended to apply to activities such as supermarkets, which have specific functional and operational requirements. Good quality design is achieved by introducing architectural/design elements to achieve an attractive, engaging and pedestrian-scale interface with public areas. Elements may include building

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						recesses, material/colour variation or landscaping.
Foodstuffs (South Island) Properties Limited and Foodstuffs South Island Limited (S464)	S464.054	Appendix Three: Design Guidelines	Reefton Heritage Town Design Guidelines	Amend	As above.	These guidelines are not intended to apply to activities such as supermarkets, which have specific functional and operational requirements. Good quality design is achieved by introducing architectural/design elements to achieve an attractive, engaging and pedestrian-scale interface with public areas. Elements may include building recesses, material/colour variation or landscaping.
Foodstuffs (South Island) Properties Limited and Foodstuffs South Island Limited (S464)	S464.055	Appendix Three: Design Guidelines	Westport/Kawatiri Town Centre and Mixed Use Zone Urban Design Guidelines	Amend	As above.	These guidelines are not intended to apply to activities such as supermarkets, which have specific functional and operational requirements. Good quality design is achieved by introducing architectural/design elements to achieve an attractive, engaging and pedestrian-scale interface with public areas. Elements may include building recesses, material/colour variation or landscaping.
Forest Habitats Limited (S186)	S186.001	Planning Maps and Overlays	Rezoning Requests	Amend	The land is of low productive capacity, and is better suited to rural residential living, being close to the township of Hokitika, and adjoining land to the west already proposed to be zoned Settlement Zone - Rural Residential Precinct. The area proposed for re-zoning is within walking distance of Hokitika and is in close proximity to the rail trail. The attached engineering report	Amend the zoning of 117 Arthurstown Road from General Rural to Settlement Zone - Rural Residential Precinct, in accordance with the attached plan [refer submission].

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					confirms that the area is suitable for development with building platforms able to be constructed above the flood plain. • The area is relatively level and geotechnically suitability for residential building platforms. • The area has attractive amenity values, with a north facing aspect towards Hokitika. • Additional higher value rural lifestyle properties here will enhance the rating base, for the benefit of the wider community.	
Forest Habitats Limited and Jacbrat Holdings Limited (S220)	\$220.001	Planning Maps and Overlays	Rezoning Requests	Amend	The land is of low productive capacity, and is better suited to rural lifestyle living where the properties will be more intensively managed. The land has high amenity values being situated between the coast and Lake Mahinapua. The properties are clearly better suited to attractive rural lifestyle living than rural production. The site adjoins land zoned 'Settlement' at Ruatapu and so there is already a definite'residential' element in the area. Rural lifestyle development has already been approved on some of the subject land. There is easy access to Hokitika. There is an existing legal road providing access into the land on the southern block, while the northern block can be accessed off Butlers Road, or the existing crossing. Additional higher value rural lifestyle properties here will enhance the rating base, for the benefit of the wider community.	Rezone 135 Ruatapu - Ross Road, Ruatapu (Pt Lot 1 DP 3199) & land acrossthe State Highway being Lot 1 DP 482257, Lot 2 DP 482257, Lot 1 DP331700, Lot 7 DP 345922, Lot 6 DP 345922, Lot 1 DP 3254 and Lots 1,2 & 3 DP 456266 from General Rural to Rural Lifestyle in accordance with the attached plan.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Forest Habitats Ltd (S138)	S138.001	Planning Maps and Overlays	Rezoning Requests	Amend	The land is of low productive capacity, and is better suited to rural lifestyle living where the properties will be more intensively managed and native revegetation planting is likely. The site is already surrounded to the north and east by Open Space Zone. The property has high amenity values and these can be enhanced, with potential sites reasonably close to Lake Mahinapua, surrounded by native bush. The property is clearly better suited to attractive rural lifestyle living than rural production. The site directly abuts land zoned 'Settlement' and so there is already a definite 'residential' element on adjoining land. Other rural residential developments have been approved on nearby properties. Access to the site off Butlers Road, rather than SH6, is currently being explored. There is easy access to Hokitika. Additional higher value rural lifestyle properties here will enhance the rating base, for the benefit of the wider community.	The submitter requests that the zoning of 135 Ruatapu-Ross Road is changed from General Rural to Rural Lifestyle. This would allow lots down to 1 ha in size.
Frances Yeoman (S33)	S33.001	Planning Maps and Overlays	Natural Hazards	Oppose	2596 Franz Josef Highway is protected from the Waiho River by the Waiho Loop. Despite this, it has been marked as the same hazard as properties which are directly beside the Waiho River, that is, Flood Hazards Susceptibility. The risk profile could not be more different. We do not believe that being in the special flood rating area means that we	Remove flood hazard susceptibility overlay from 2596 Franz Josef Highway.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					are also at risk. This hazard classification should be based on actual risks and not on rating areas. If the perceived risk is regarded as to be from Potters Creek or Stony Creek, the elevations do not tell this story. We are very concerned about implications, for example bank security valuations and insurance.	
Frank and Jo Dooley (S478)	S478.001	Planning Maps and Overlays	Coastal Environment	Amend	The overlay is too extensive	Review the Coastal Environment overlay and reduce the extent of area it covers.
Frank and Jo Dooley (S478)	S478.002	Coastal Environment	Coastal Environment Rules	Oppose	The rules are too restrictive	Revise the rules to make more enabling of development.
Frank and Jo Dooley (S478)	S478.003	Residential Zones	Residential Zones	Amend	The rules appear to have been written without considering existing property owners - particularly where rezoning has occurred.	Rules to contain provisions that address management of sites being rezoned - they should only be triggered where there is a full infrastructure plan in place.
Frank and Jo Dooley (S478)	S478.004	Rural Zones	Rural Zones	Amend	The rules appear to have been written without considering existing property owners - particularly where rezoning has occurred.	Rules to contain provisions that address management of sites being rezoned - they should only be triggered where there is a full infrastructure plan in place.
Frank and Jo Dooley (S478)	S478.005	Natural Hazards	Overview	Support	Support the definition of the Westport Hazard Overlay - applying to the area where the West Coast Regional Council LTP identified for flood protection and including Orowaiti Road and Wakefield Road but amendment is needed to reflect that the WCRC LTP protection works are sufficient to protect the area.	Amend the notified definition of the Westport Hazard Overlay to read "This applies to the area certified by the WCRC as protected noting the impacts of climate change have been included in the design, development and implementation of the Westport Flood and Coastal erosion protection Scheme".
Frank and Jo Dooley (S478)	S478.006	Planning Maps and Overlays	Natural Hazards	Support	Support the extent of the Westport Natural Hazard Overlay	Retain the current extent of the Westport Hazard Overlay
Frank and Jo Dooley (S478)	S478.007	Interpretation	Definitions	Amend	To avoid uncertainty and simplify administration of the TTPP.	Provide a definition for ARI.
Frank and Jo Dooley (S478)	S478.008	Interpretation	Definitions	Amend	To avoid uncertainty and simplify administration of the TTPP.	Provide a definition for AEP

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Frank and Jo Dooley (S478)	S478.009	Natural Hazards	NHP13	Amend	The relationship of this policy with the protection to provided by the WCRC Long Term Plan (via the Westport Hazard Overlay) and with Policy NH-R52 is unclear. It is assumed that the planning framework would require new development to mitigate against the Westport flood Hazard in advance of the protection provided by the WCRC being completed/certified. However once it is certified it is expected that no such mitigation would be required.	That the policies be amended to explain the expectations when the Westport flood scheme is completed. Delete clauses a, b, and c - or at least remove any uncertainty as to whether the planned LTP works will provide the stated level of protection.
Frank and Jo Dooley (S478)	S478.010	Natural Hazards	NHR1	Oppose	The 2 year timeframe in clause 3 is opposed. It is a very short timeframe for all design, consenting and construction to be completed.	That clause 3 be deleted and integrated into what is currently clause 4 with a timeframe of 10 years.
Frank and Jo Dooley (S478)	S478.011	Natural Hazards	NHR52	Amend	The purpose and intent of this rule is unclear. The current rule does not clearly apply the "protection" to be provided by the WCRC and applied to the rules within the Westport Hazard Area.	Clause 1 should be amended to delete the protection standard after the words "Westport Flood and Coastal Erosion Protection Scheme".
Frank and Jo Dooley (S478)	S478.013	Natural Hazards	NHR52	Amend	unreasonable to put the requirement to mitigate flooding on individual landowners.	Amend the need to provide flood protection to the levels set out.
Frank and Jo Dooley (S478)	S478.014	Natural Hazards	NHR52	Amend	To avoid creating a landscape of elevated new development in the short term.	Ament NH - R52 (2 - 5) to allow for finished floor levels for buildings for sensitive activities to be built to the 1 in 100 year ARI coastal event (without sea level rise) and the 1%AEP flood event until the Flood Protection Scheme is in place
Frank and Jo Dooley (S478)	S478.015	Natural Hazards	Natural Hazards Objectives	Amend	Set out the District Council's role to ensure the flood protection scheme provides protection for all land	Amend Objectives to set out the District Council's role in ensuring flood protection scheme provides protection for all land occurs
Frank and Jo Dooley (S478)	S478.016	Natural Hazards	Natural Hazards Policies	Amend	Set out the District Council's role to ensure the flood protection scheme provides protection for all land	Amend Policies to set out the District Council's role in ensuring flood protection

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						scheme provides protection for all land occurs
Frank and Jo Dooley (S478)	S478.017	Natural Hazards	NHR52	Amend	provide for an enabling rule even if a scheme which achieves a lower level of protection is deemed to be acceptable.	Amend the wording of the NH - R52 (1) to allow for new development to occur once an appropriate scheme is in place
Frank and Jo Dooley (S478)	S478.018	Natural Hazards	NHR52	Amend	NH - R52 Rule properties are being filled to create elevated platforms.	Amend the residential zone rules to allow an exception for recession plane intrusions caused by elevated floor levels arising from compliance with the NH - R52
Frank and Jo Dooley (S478)	S478.019	Natural Hazards	Natural Hazards	Amend	to ensure landowners do not have to engage expensive consultants to know how to achieve compliance.	Introduce a Council operated tool that generates the minimum floor levels required across the overlay when a protection scheme is not in place,
Frank and Jo Dooley (S478)	S478.020	General Rural Zone	GRUZ - R1	Amend	appropriate levels of rural amenity can be achieved on allotments of 4,000 m ²	Amend to acknowledge the rural living characteristics including appropriate levels of rural amenity can be achieved on allotments of 4,000 m ²
Frank and Jo Dooley (S478)	S478.021	Rural Zones	Rural Zones - Objectives and Policies	Amend	increase the ability of existing landholdings to provide for semi-rural living expectations	Amend objectives and policies relating to the Rural Lifestyle Zone to allow for minimum allotment size of 4,000 m², including but not limited to recognition within policy RURZ - P4 that 4,000 m² can provide for large lots anticipated by the policy.
Frank and Jo Dooley (S478)	S478.022	Subdivision	SUB - S1	Amend	Increase the ability of existing landholdings to provide for semi-rural living expectations	Amend to Minimum Lot Sizes for Each Allotment Standard 1 (g) to provide for the minimum allotment size of the Rural Lifestyle zone of 4,000 m ²
Frank and Jo Dooley (S478)	S478.023	Rural Lifestyle Zone	RLZ - R3	Amend	Increase the ability of existing landholdings to provide for semi-rural living expectations	residential unit density of no more than one unit per 4,000 m² net site area on physically contiguous land

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Frank and Jo Dooley (S478)	S478.024	Planning Maps and Overlays	Rezoning Requests	Amend	This existing environment already undermines the intent of the proposed General Rural Zone	The portion of Nine Mile Road from Stafford Street to the Nine Mile, Victoria and Harneys Roads intersection, extending from the railway corridor to the banks of the Buller River be rezoned from General Rural Zone to Rural Lifestyle Zone.
Frank and Jo Dooley (S478)	S478.025	Natural Hazards	Natural Hazards	Amend	Ought to be included within the flood defences offer by this solution.	amend to ensure property be fully included within the limits of future stop bank protection designed to service Westport.
Frank and Jo Dooley (S478)	S478.026	Planning Maps and Overlays	Natural Hazards	Amend	To take into consideration the reduced risk from coastal effects due to accreting sand spit	Amend to remove the coastal severe overlay from 211 Utopia Road
Frank and Jo Dooley (S478)	S478.027	Planning Maps and Overlays	Rezoning Requests	Amend	rezone as Rural Lifestyle Zone to reflect its current use	rezone 211 Utopia Road to Rural Lifestyle Zone
Frank and Jo Dooley (S478)	S478.028	Subdivision	SUB - O2	Amend	do not recognise appropriate mitigation measures to reduce or avoid risks	Amend to read: Subdivision occurs in locations and at a rate that: af. Avoids Sufficiently mitigates risks from significant natural hazards and are built to be resilient to natural hazards.
Frank and Jo Dooley (S478)	S478.029	Subdivision	SUB - P6	Amend	do not recognise appropriate mitigation measures to reduce or avoid risks	Avoid subdivision: a f. In areas of that does not manage significant risk of natural hazards, where this is for the purposes of accommodating and/or servicing people and communities.
Frank and Jo Dooley (S478)	S478.030	Subdivision	SUB - R13	Amend		Amend to allow relief from the building platform standard SUB - S2 (2)(c) to reconcile the inconsistency in the rule framework, or some other similar relief that allows for SUB - R13 to function as intended

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Frank and Jo Dooley (S478)	S478.031	General Residential Zone	GRZ - R19	Amend	Discretion should be restricted to amenity related aspects of the fence.	Amend to remove fences walls and retaining structures from the rule
Frank and Jo Dooley (S478)	S478.032	Large Lot Residential Zone	LLRZ-R15	Amend	Discretion should be restricted to amenity related aspects of the fence.	Amend to remove fences walls and retaining structures from the rule
Frank and Jo Dooley (S478)	S478.033	Medium Density Residential Zone	MRZ - R3	Amend	Discretion should be restricted to amenity related aspects of the fence.	Amend to remove fences walls and retaining structures from the rule
Frank and Jo Dooley (S478)	S478.034	General Rural Zone	GRUZ - R28	Amend	Discretion should be restricted to amenity related aspects of the fence.	Amend to remove fences walls and retaining structures from the rule
Frank and Jo Dooley (S478)	S478.035	Rural Lifestyle Zone	RLZ - R19	Amend	Discretion should be restricted to amenity related aspects of the fence.	Amend to remove fences walls and retaining structures from the rule
Frank and Jo Dooley (S478)	S478.036	Settlement Zone	SETZ - R25	Amend	Discretion should be restricted to amenity related aspects of the fence.	Amend to remove fences walls and retaining structures from the rule
Frank and Jo Dooley (S478)	S478.037	General Residential Zone	GRZ - R18	Amend	oversized fencing is a discrete activity and rule should mitigate amenity-based effects,	New Rule: [zone reference] - R[XX] Fences, Walls and Retaining Structures: Activity Status Restricted Discretionary Discretion is restricted to: a. Design and location of structures b. Height of structure's c. Shading and dominance effects on adjoining sites
Frank and Jo Dooley (S478)	S478.038	Large Lot Residential Zone	LLRZ - R14	Amend	oversized fencing is a discrete activity and rule should mitigate amenity-based effects,	New Rule: [zone reference] - R[XX] Fences, Walls and Retaining Structures: Activity Status Restricted Discretionary Discretion is restricted to: a. Design and location of structures b. Height of structure's c. Shading and dominance effects on adjoining sites
Frank and Jo Dooley (S478)	S478.039	Medium Density Residential Zone	MRZ - R14	Amend	oversized fencing is a discrete activity and rule should mitigate amenity-based effects,	New Rule: [zone reference] - R[XX] Fences, Walls and Retaining Structures: Activity Status Restricted Discretionary Discretion is restricted to:

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						a. Design and location of structures b. Height of structure's c. Shading and dominance effects on adjoining sites
Frank and Jo Dooley (S478)	S478.040	General Rural Zone	GRUZ - R26	Amend	oversized fencing is a discrete activity and rule should mitigate amenity-based effects,	New Rule: [zone reference] - R[XX] Fences, Walls and Retaining Structures: Activity Status Restricted Discretionary Discretion is restricted to: a. Design and location of structures b. Height of structure's c. Shading and dominance effects on adjoining sites
Frank and Jo Dooley (S478)	S478.041	Rural Lifestyle Zone	RLZ - R15	Amend	oversized fencing is a discrete activity and rule should mitigate amenity-based effects,	New Rule: [zone reference] - R[XX] Fences, Walls and Retaining Structures: Activity Status Restricted Discretionary Discretion is restricted to: a. Design and location of structures b. Height of structure's c. Shading and dominance effects on adjoining sites
Frank and Jo Dooley (S478)	S478.042	Settlement Zone	SETZ - R23	Amend	oversized fencing is a discrete activity and rule should mitigate amenity-based effects,	New Rule: [zone reference] - R[XX] Fences, Walls and Retaining Structures: Activity Status Restricted Discretionary Discretion is restricted to: a. Design and location of structures b. Height of structure's c. Shading and dominance effects on adjoining sites
Frank and Jo Dooley (S478)	S478.043	Whole Plan	Whole plan	Amend	This submission seeks any consequential amendments to give effect to the relief sought above.	Any consequential amendments to give effect to the relief sought above.
Frank and Jo Dooley (S478)	S478.044	Planning Maps and Overlays	Hospital Zone	Support	The O'Conor Institute Trust Board ('the Board') own the property at 190 Queen Street, Westport that is zoned 'Hospital Zone' in the proposed TTPP (Map 150). It	Retain Hospital Zone over property at 190 Queen Street, Westport

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					is noted that the whole property is covered by this zoning (8.9790Ha) which the Board supports	
Frank and Jo Dooley (S478)	S478.045	Planning Maps and Overlays	Rezoning Requests	Amend	The proposed zoning pattern would result in different setback rules applying to the O'Conor Home site at 190 Queen Street, Westport.	Rezone Stafford Street beside the O'Connor Home as General Residential Zone.
Frank and Jo Dooley (S478)	S478.046	Hospital Zone	HOSZ - P1	Amend	Although the O'Connor Home is within the proposed Hospital Zone, aged care is only mentioned in the overview and objectives, but not specifically in the policies.	That 'aged care facilities and associated residential activities, including independent living' be added to the Hospital Zone Policy 1 (HOSZ - P1).
Frank and Jo Dooley (S478)	S478.047	Hospital Zone	HOSZ - R1	Support	The board requests that 'aged care facilities and associated residential activity, including independent living' be incorporated into clause (k) of this definition as a part of ensuring the activities long established at 190 Queen Street, Westport are provided for.	That 'aged care facilities and associated residential activity, including independent living' be incorporated into clause (k) of this definition as a part of ensuring the activities long established at 190 Queen Street, Westport are provided for. It is also noted that the above 'o' point has 'laundries' misspelt as 'laudries' which needs to be corrected also.
Frank and Jo Dooley (S478)	S478.048	Hospital Zone	HOSZ - R3	Amend	HOSZ - R1.3 and HOSZ - R1.5 contradict each other. R1.3 says the maximum building length is 20m where this is within 5m of an adjoining RESZ- Residential zone but R1.5 says that all buildings must be set back 5m from any residential zone. It is submitted that these rules need to be amended to ensure the TTPP is clear in its intentions.	Amend rules R1.3 and R1.5 so they don't contradict each other.
Frank and Jo Dooley (S478)	S478.049	Hospital Zone	HOSZ - R3	Amend	There are no setback requirements for boundaries zoned 'General Rural Zone' which is supported, however a 2m setback from a General Rural Zone boundary may be appropriate.	Consider whether a 2m setback from a General Rural Zone boundary may be appropriate.
Frank and Jo Dooley (S478)	S478.050	Hospital Zone	HOSZ - R1	Support in part	HOSZ - R10 - Residential Activity not provided for as a Permitted Activity. This is supported, so long as 'aged care	Retain provision for "aged care facilities and associated residential activity, including independent living' is provided

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					facilities and associated residential activity, including independent living' is provided for in HOSZ - R1. Aged care and associated residential activity including independent living, is necessary to ensure the O'Conor Home can continue to serve and provide for a vital community need.	for in HOSZ - R1.
Frank and Jo Dooley (S478)	S478.051	Natural Hazards	Westport Hazard Overlay	Amend	The definition of the Westport Hazard Overlay is supported, and in particular, the reference to the area to "be protected". It is however interpreted that the protection works planned by the WCRC Long Term Plan will provide that level of mitigation required by the wider planning framework, and addressed in the specific provisions addressed below. As such, it is submitted that the definition of the Westport Hazard Overlay be extended	Include the words "This applies to the area certified by the WCRC as protected noting the impacts of climate change have been included in the design, development and implementation of the Westport Flood and Coastal Erosion Protection Scheme".
Frank and Jo Dooley (S478)	S478.052	Interpretation	Definitions	Amend	to avoid uncertainty and simplify the administration of the TTPP.	Any reference to AEP and ARI be appropriately defined
Frank and Jo Dooley (S478)	S478.053	Natural Hazards	NHP13	Amend	The relationship of this policy with the protection to be provided by the WCRC Long Term Plan (via the Westport Hazard Overlay), and with Policy NH - R52, is unclear. It is assumed that the planning framework would require new development to mitigate against the Westport (flood) Hazard in advance of the protection provided by the WCRC being completed / certified. However once the LTP protection is certified, it is also expected that no such mitigation would be required. As such, the relevant policies and rules should clearly set out those expectations, while also providing for ease of administration and	Clauses a, b and c within Policy NH - P13 should be deleted, or at least remove any uncertainty as to whether the planned LTP works will provide the stated level of protection.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					interpretation. It is submitted that the current provisions will not lead to this outcome.	
Frank and Jo Dooley (S478)	S478.054	Natural Hazards	NHR1	Amend	The 2-year timeframe imposed within clause 3 of this policy is opposed. Two years is a very short timeframe for all design, consenting and construction to be completed.	That clause 3 be deleted and integrated into what is currently clause 4.
Frank and Jo Dooley (S478)	S478.055	Natural Hazards	NHR52	Amend	As set out under items 7 and 8 above, it is considered that the purpose and intent of this rule needs to be clearly stated, so that it leads to clear interpretation that is easy to administer. The current rule does not clearly apply the 'protection' to be provided by the WCRC and applied to the rules within the Westport Hazard Area. Likewise, it is in the communities interest for the O'Conor Home site to be further developed in future given the services it provided to the Buller community, including the provision of independent living. It is submitted that clause 1 need not contain the protection standard after the words 'Westport Flood and Coastal Erosion Protection Scheme' and before the words 'as certified by the West Coast Regional Council'.	Remove from clause 1 the protection standard after the words 'Westport Flood and Coastal Erosion Protection Scheme' and before the words 'as certified by the West Coast Regional Council'.
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 be permitted.
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.	Suitably qualified and experienced architects should be provided for in R2 rather than 'heritage architects' specifically.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					Likewise, it is considered that there are many suitably qualified and experience architects that do not necessarily fall within the definition of 'heritage architect'.	
Frank and Jo Dooley (S478)	S478.058	How The Plan Works	General Approach	Amend	There is a significant risk to those using the TTPP in that the provisions contained in the Energy chapter will be missed - as there is not any reference to them in the zone chapters or planning maps.	Include the corridor protection rules that relate to Energy within the Zone Chapters of the plan, rather than in a stand alone chapter
Frank and Jo Dooley (S478)	S478.059	Energy	ENG - R6	Amend	There is a significant risk to those using the TTPP in that the provisions contained in the Energy chapter will be missed. This risk is causes by there not being any reference to these rules on the planning maps nor in the Zone Chapters.	Include this rule within the zone provisions where significant distribution lines exist.
Frank and Jo Dooley (S478)	S478.060	Energy	ENG - R7	Amend	There is a significant risk to those using the TTPP in that the provisions contained in the Energy chapter will be missed.	Include this rule within the zone provisions where significant distribution lines exist.
Frank and Jo Dooley (S478)	S478.061	How The Plan Works	Cross Boundary Matters	Amend		That the following be added under cross boundary issues: "the identification of the safe and efficient functioning of the electricity transmission networks, including protecting important infrastructure from reverse sensitivity effects as an issue in respect of cross boundary matters and acknowledge the approach to consultation and consistent provisions being the means to resolving the issue"
Frank and Jo Dooley (S478)	S478.062	Interpretation	COMMUNITY SCALE	Support		Retain definition as notified
Frank and Jo Dooley (S478)	S478.063	Interpretation	CRITICAL INFRASTRUCTURE	Support		Retain definition as notified.
Frank and Jo Dooley (S478)	S478.064	Interpretation	ENERGY ACTIVITY	Support		Retain definition as notified.
Frank and Jo Dooley (S478)	S478.065	Interpretation	FUNCTIONAL NEED	Support		Retain definition as notified

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Frank and Jo Dooley (S478)	S478.066	Interpretation	Infrastructure	Support		Retain definition as notified.
Frank and Jo Dooley (S478)	S478.067	Interpretation	LARGE SCALE	Support in part		amend to read means, when applied to provisions in the Energy, Infrastructure and Transport Chapter, electricity generation activities utilising renewable energy sources with a capacity of greater than 100kW for the purposes of exporting electricity directly into the distribution network or National Grid. It includes all ancillary components and activities including but not limited to such as lines, poles, structures, substations, climate / environmental monitoring equipment, earthworks, roading, maintenance buildings, temporary concrete batching plants, internal transmission and fibre networks, and site rehabilitation works.
Frank and Jo Dooley (\$478)	S478.068	Interpretation	MAINTENANCE	Support in part		Amend as follows: In relation to infrastructure and renewable electricity generation activities, any work or activity necessary to continue the operation and / or functioning of existing infrastructure including but not limited to existing line, building structure, facility or utility, and shall also provide for replacement of an existing line, building, structure or other facility with another of the same or similar height, size or scale, within the same or similar purpose. It does not include any expansion of the existing line, building, structure, facility or significant upgrading.
Frank and Jo Dooley (S478)	S478.069	Interpretation	NATIONAL GRID	Support		retain definition as notified

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Frank and Jo Dooley (S478)	S478.070	Interpretation	NATIONAL GRID SUBDIVISION CORRIDOR	Support		Retain as notified
Frank and Jo Dooley (S478)	S478.071	Interpretation	NATIONAL GRID YARD	Support		Retain as notified
Frank and Jo Dooley (S478)	S478.072	Interpretation	NETWORK UTILITY OPERATOR	Support		Retain as notified
Frank and Jo Dooley (S478)	S478.073	Interpretation	Interpretation	Amend		Use the term network utility operator consistently through the plan - there are a range of other terms that have been used.
Frank and Jo Dooley (S478)	S478.074	Interpretation	OPERATIONAL NEED	Support	The proposed definition of 'Operational Need' supports the inclusion of a definition of "Operational Need", however there has been a spelling mistake where "logistical" has been used where it should be "locational".	Retain the definition, fix the spelling mistake where "logistical" has been used where it should be "locational".
Frank and Jo Dooley (S478)	S478.075	Interpretation	UPGRADING	Oppose	The current definition is confusing and will limit Buller Electricity's ability to provide for the community.	That the definition be amended as follows: means in relation to infrastructure and renewable electricity generation activities, an increase in kV wattage/transmission for an existing distribution line, or increase in the footprint of an existing structure/building, the improvement or increase in carrying capacity, operational efficiency, security or safety of existing infrastructure and renewable electricity generation activities, but excludes maintenance and repair.
Frank and Jo Dooley (S478)	S478.076	Energy	Overview	Support	Buller Electricity supports the overview in the energy section of the Energy Infrastructure and Transport Chapter.	It is suggested that a comma between Energy and Infrastructure is appropriate - Energy, Infrastructure and Transport Chapter.
Frank and Jo Dooley (S478)	S478.077	Energy	ENG - 01	Amend	The proposed Objective ENG - 01 is supported in part however BEL seek a	Amend to read: To recognise the local and regional benefits of electricity transmission, distribution and renewable

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					minor amendment to the objective, as set out below, to ensure it reads correctly.	electricity generation activities; and provide for their development, operation, maintenance and upgrading to meet the needs of Te Tai o Poutini/the West Coast.
Frank and Jo Dooley (S478)	S478.078	Energy	ENG - O2	Support in part		the objective should be reworded as follows: Have particular regard to the constraints imposed by the technical, locational and operational requirements when seeking to avoid, remedy or mitigate adverse effects on communities and the environment from an energy activities design and location.
Frank and Jo Dooley (S478)	S478.079	Energy	ENG - 03	Support in part	The objective should be amended to give effect to the RPS	Amend objective to read <i>To</i> provide for the enable the development, operation, maintenance and upgrade of <i>energy</i> activities, and to protect them from the adverse effects of incompatible subdivision and development.
Frank and Jo Dooley (S478)	S478.080	Energy	Energy Objectives	Amend	This separates the requirement to give effect to the RPS from the second part of Objective 3	Add a new objective as follows: Energy activities, including their operation, maintenance, upgrading or development, are protected from the adverse effects of incompatible subdivision and development.
Frank and Jo Dooley (S478)	S478.081	Energy	ENG - 04	Amend		Amend objective to read as follows: To recognise and provide for the national, regional and local significance and benefits of the National Grid, by ensuring the safety, efficiency, operation, maintenance, repair, upgrade and development is not adversely affected by incompatible subdivision, use and development.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Frank and Jo Dooley (S478)	S478.082	Energy	ENG - P1	Support in part	Buller Electricity seeks minor amendments to enable minor upgrading of important infrastructure in order to give effect to Policy 5 of the NPSET that requires"decision-makers must enable the reasonable operational, maintenance and minor upgrade requirements of established electricity transmission assets."	Amend to read: Provide for and enable the development, operation, maintenance and upgrading of existing and new electricity transmission, distribution and renewable generation infrastructure and assets.
Frank and Jo Dooley (S478)	S478.083	Energy	ENG - P2	Support in part	The proposed Policy ENG - P2 is supported on the basis that it is generally consistent with Policy 1 of the NPSET. Buller Electricity however seeks minor amendments in order to be entirely consistent with this policy:	Amend to read: When considering proposals to develop and operate new and existing energy activities, infrastructure and assets provide for have particular regard to the benefits to be obtained from the proposal, including; a. Maintaining or increasing security of renewable electricity supply by diversifying the type and/or location of electricity generation; orb. Maintaining or increasing renewable electricity generation capacity while avoiding, reducing or displacing greenhouse gas emissions; orc. Economic, social, environmental or cultural wellbeing; ord. The contribution the proposal will have towards New Zealand meeting its renewable electricity generation targets; ore. Effective transmission and distribution of electricity supply; orf. Facilitation and use of renewable energy; org. Security of electricity supply; and orh. Meeting New Zealand/Aotearoa me Te Waipounamu's climate change obligations.
Frank and Jo Dooley (S478)	S478.084	Energy	ENG - P3	Oppose	Buller Electricity opposes this policy and requests that it is reworded in order to give effect to Policy 10 in the NESET	Amend policy to read: Avoid reverse sensitivity effects from subdivision, use and development on electricity distribution and transmission assets, existing renewable electricity generation activities

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						and associated infrastructure, and protect such infrastructure from adverse effects of activities on the operation, maintenance, upgrading or development of that infrastructure.
Frank and Jo Dooley (S478)	S478.085	Energy	ENG - P4	Amend	The proposed Policy ENG - P4 is generally supported however a minor amendment is sought as the use of "minimise" in the opening clause is concerning because: - the subsequent clauses seek a number of outcomes that are management approaches; - the term my imply that adverse effects must be made 'minimal' and this outcome may not always be possible; - the NESET does not require effects to be minimised in all circumstances, but refer to the effects being "managed" in the objectives and "avoided, remedied or mitigated" in Policies 3 and 4.	Replace the word "minimise" with "manage" in the policy.
Frank and Jo Dooley (S478)	S478.086	Energy	ENG - P5	Support in part	The proposed Policy ENG - P5 is generally supported however the following minor amendment is sought in order to give effect to the RPS	When considering proposals to develop, operate, maintain and upgrade new and existing energy activities, infrastructure and assets:a. Recognise Have particular regard to the constraints imposed by their functional constrains and operational requirements; andb. Where new transmission infrastructure and major upgrades to transmission infrastructure are proposed have regard to the extent to which any adverse effects have been minimised managed in the route, site and method selection.
Frank and Jo Dooley (S478)	S478.087	Energy	ENG - P6	Support		Retain as notified

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Frank and Jo Dooley (S478)	S478.088	Energy	ENG - P7	Support		Retain as notified
Frank and Jo Dooley (S478)	S478.089	Energy	ENG - P8	Support		Retain as notified
Frank and Jo Dooley (S478)	S478.090	Energy	ENG - P9	Support		Retain as notified
Frank and Jo Dooley (S478)	S478.091	Energy	Energy Policies	Amend	A new Policy ENG - 10 to provide a clear "line of sight" between any of the policies as notified (ENG - P1 to ENG - P9) and Energy Rule 1 (ENG - R1).	Include a new policy as follows: Avoid radio, electric and magnetic fields that do not meet the applicable New Zealand or International standards or guidelines, or National Environmental Standards.
Frank and Jo Dooley (S478)	S478.092	Energy	Permitted Activities	Amend	It is unclear whether underground electricity transmission lines are a permitted activity in the proposed TTPP.	Make it clear that underground electricity transmission lines are a permitted activity
Frank and Jo Dooley (S478)	S478.093	Energy	ENG - R1	Support in part	Rule ENG - R1 (Energy Permitted Activity Performance Standards) is supported in part, however an amendment is sought in order to accommodate any future updates of the referenced documents while also seeking to be consistent with Policy 9 of the NESET. This rule would then also relate to the above proposed additional Policy ENG - 10.	Amend as follows: 1. Electric and Magnetic fields - An activity generating electric or magnetic fields does not exceed the maximum exposure level listed in the International Commission on Non-ionizing Radiation Protection Guidelines for limiting exposure to time-varying electric and magnetic fields (1Hz - 100 kHz) (Health Physics (6):818-836; 2010) or revisions thereof, and the recommendations from the World Health Organisation's monograph Environmental Health Criteria 238, June 2007 or revisions thereof and any applicable New Zealand standards or National Environmental Standards.
Frank and Jo Dooley (S478)	S478.094	Energy	ENG - R2	Support	The proposed Rule ENG - R2 '(Substations (Zone))' is supported in that it enables the operation, maintenance, repair and upgrade of existing substations within existing switchyards or buildings, and also new substations in an industrial zone.	Retain as notified.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Frank and Jo Dooley (S478)	S478.095	Energy	ENG - R3	Support		Retain as notified
Frank and Jo Dooley (S478)	S478.096	Energy	ENG - R4	Support in part	It is considered that the reference to poles in Clause 4 of this rule needs to be amended to read: "pole structures at its widest point". The addition of the word "structures" makes more practical sense. It is also considered that clause 5 of this rule also needs to also provide for additional poles and assemblies as the current rules (PC145) provide for up to 5 poles to be added as a permitted activity.	Amend as follows: amend the reference to poles in Clause 4 to read: "pole structures at its widest point". Amend Clause 5 to provide for up to 5 additional poles and assemblies.
Frank and Jo Dooley (S478)	S478.097	Energy	ENG - R8	Support		Retain as notified.
Frank O'Toole (S595)	S595.001	Natural Hazards	NHR52	Amend	unreasonable to put the requirement to mitigate flooding on individual landowners.	Amend the need to provide flood protection to the levels set out.
Frank O'Toole (S595)	S595.002	Natural Hazards	NHR52	Amend	To avoid creating a landscape of elevated new development in the short term.	Ament NH - R52 (2 - 5) to allow for finished floor levels for buildings for sensitive activities to be built to the 1 in 100 year ARI coastal event (without sea level rise) and the 1%AEP flood event until the Flood Protection Scheme is in place
Frank O'Toole (S595)	\$595.003	Natural Hazards	Natural Hazards Objectives	Amend	Set out the District Council's role to ensure the flood protection scheme provides protection for all land	Amend Objectives to set out the District Council's role in ensuring flood protection scheme provides protection for all land occurs
Frank O'Toole (S595)	\$595.004	Natural Hazards	Natural Hazards Policies	Amend	Set out the District Council's role to ensure the flood protection scheme provides protection for all land	Amend Policies to set out the District Council's role in ensuring flood protection scheme provides protection for all land occurs
Frank O'Toole (S595)	\$595.005	Natural Hazards	NHR52	Amend	provide for an enabling rule even if a scheme which achieves a lower level of protection is deemed to be acceptable.	Amend the wording of the NH - R52 (1) to allow for new development to occur once an appropriate scheme is in place

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Frank O'Toole (S595)	\$595.006	Natural Hazards	NHR52	Amend	NH - R52 Rule properties are being filled to create elevated platforms.	Amend the residential zone rules to allow an exception for recession plane intrusions caused by elevated floor levels arising from compliance with the NH - R52
Frank O'Toole (S595)	\$595.007	Natural Hazards	Natural Hazards	Amend	to ensure landowners do not have to engage expensive consultants to know how to achieve compliance.	Introduce a Council operated tool that generates the minimum floor levels required across the overlay when a protection scheme is not in place,
Frank O'Toole (S595)	\$595.008	General Rural Zone	GRUZ - R1	Amend	appropriate levels of rural amenity can be achieved on allotments of 4,000 m ²	Amend to acknowledge the rural living characteristics including appropriate levels of rural amenity can be achieved on allotments of 4,000 m ²
Frank O'Toole (S595)	\$595.009	Rural Zones	Rural Zones - Objectives and Policies	Amend	increase the ability of existing landholdings to provide for semi-rural living expectations	Amend objectives and policies relating to the Rural Lifestyle Zone to allow for minimum allotment size of 4,000 m², including but not limited to recognition within policy RURZ - P4 that 4,000 m² can provide for large lots anticipated by the policy.
Frank O'Toole (S595)	\$595.010	Subdivision	SUB - S1	Amend	Increase the ability of existing landholdings to provide for semi-rural living expectations	Amend to Minimum Lot Sizes for Each Allotment Standard 1 (g) to provide for the minimum allotment size of the Rural Lifestyle zone of 4,000 m ²
Frank O'Toole (S595)	\$595.011	Rural Lifestyle Zone	RLZ - R3	Amend	Increase the ability of existing landholdings to provide for semi-rural living expectations	residential unit density of no more than one unit per 4,000 m² net site area on physically contiguous land
Frank O'Toole (S595)	\$595.012	Planning Maps and Overlays	Rezoning Requests	Amend	This existing environment already undermines the intent of the proposed General Rural Zone	The portion of Nine Mile Road from Stafford Street to the Nine Mile, Victoria and Harneys Roads intersection, extending from the railway corridor to the banks of the Buller River be rezoned from General Rural Zone to Rural Lifestyle

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						Zone.
Frank O'Toole (S595)	S595.013	Natural Hazards	Natural Hazards	Amend	Ought to be included within the flood defences offer by this solution.	amend to ensure property be fully included within the limits of future stop bank protection designed to service Westport.
Frank O'Toole (S595)	S595.014	Planning Maps and Overlays	Natural Hazards	Amend	To take into consideration the reduced risk from coastal effects due to accreting sand spit	Amend to remove the coastal severe overlay from 211 Utopia Road
Frank O'Toole (S595)	S595.015	Planning Maps and Overlays	Rezoning Requests	Amend	rezone as Rural Lifestyle Zone to reflect its current use	rezone 211 Utopia Road to Rural Lifestyle Zone
Frank O'Toole (S595)	S595.016	Subdivision	SUB - O2	Amend	do not recognise appropriate mitigation measures to reduce or avoid risks	Amend to read: Subdivision occurs in locations and at a rate that: af. Avoids Sufficiently mitigates risks from significant natural hazards and are built to be resilient to natural hazards.
Frank O'Toole (S595)	\$595.017	Subdivision	SUB - P6	Amend	do not recognise appropriate mitigation measures to reduce or avoid risks	Avoid subdivision: a f. In areas of that does not manage significant risk of natural hazards, where this is for the purposes of accommodating and/or servicing people and communities.
Frank O'Toole (S595)	S595.018	Subdivision	SUB - R13	Amend		Amend to allow relief from the building platform standard SUB - S2 (2)(c) to reconcile the inconsistency in the rule framework, or some other similar relief that allows for SUB - R13 to function as intended
Frank O'Toole (S595)	S595.019	General Residential Zone	GRZ - R19	Amend	Discretion should be restricted to amenity related aspects of the fence.	Amend to remove fences walls and retaining structures from the rule
Frank O'Toole (S595)	S595.020	Large Lot Residential Zone	LLRZ-R15	Amend	Discretion should be restricted to amenity related aspects of the fence.	Amend to remove fences walls and retaining structures from the rule

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Frank O'Toole (S595)	S595.021	Medium Density Residential Zone	MRZ - R3	Amend	Discretion should be restricted to amenity related aspects of the fence.	Amend to remove fences walls and retaining structures from the rule
Frank O'Toole (S595)	S595.022	General Rural Zone	GRUZ - R28	Amend	Discretion should be restricted to amenity related aspects of the fence.	Amend to remove fences walls and retaining structures from the rule
Frank O'Toole (S595)	S595.023	Rural Lifestyle Zone	RLZ - R19	Amend	Discretion should be restricted to amenity related aspects of the fence.	Amend to remove fences walls and retaining structures from the rule
Frank O'Toole (S595)	S595.024	Settlement Zone	SETZ - R25	Amend	Discretion should be restricted to amenity related aspects of the fence.	Amend to remove fences walls and retaining structures from the rule
Frank O'Toole (S595)	S595.025	General Residential Zone	GRZ - R18	Amend	oversized fencing is a discrete activity and rule should mitigate amenity-based effects,	New Rule: [zone reference] - R[XX] Fences, Walls and Retaining Structures: Activity Status Restricted Discretionary Discretion is restricted to: a. Design and location of structures b. Height of structure's c. Shading and dominance effects on adjoining sites
Frank O'Toole (S595)	S595.026	Large Lot Residential Zone	LLRZ - R14	Amend	oversized fencing is a discrete activity and rule should mitigate amenity-based effects,	New Rule: [zone reference] - R[XX] Fences, Walls and Retaining Structures: Activity Status Restricted Discretionary Discretion is restricted to: a. Design and location of structures b. Height of structure's c. Shading and dominance effects on adjoining sites
Frank O'Toole (S595)	S595.027	Medium Density Residential Zone	MRZ - R14	Amend	oversized fencing is a discrete activity and rule should mitigate amenity-based effects,	New Rule: [zone reference] - R[XX] Fences, Walls and Retaining Structures: Activity Status Restricted Discretionary Discretion is restricted to: a. Design and location of structures b. Height of structure's c. Shading and dominance effects on adjoining sites

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Frank O'Toole (S595)	\$595.028	General Rural Zone	GRUZ - R26	Amend	oversized fencing is a discrete activity and rule should mitigate amenity-based effects,	New Rule: [zone reference] - R[XX] Fences, Walls and Retaining Structures: Activity Status Restricted Discretionary Discretion is restricted to: a. Design and location of structures b. Height of structure's c. Shading and dominance effects on adjoining sites
Frank O'Toole (S595)	\$595.029	Rural Lifestyle Zone	RLZ - R15	Amend	oversized fencing is a discrete activity and rule should mitigate amenity-based effects,	New Rule: [zone reference] - R[XX] Fences, Walls and Retaining Structures: Activity Status Restricted Discretionary Discretion is restricted to: a. Design and location of structures b. Height of structure's c. Shading and dominance effects on adjoining sites
Frank O'Toole (S595)	S595.030	Settlement Zone	SETZ - R23	Amend	oversized fencing is a discrete activity and rule should mitigate amenity-based effects,	New Rule: [zone reference] - R[XX] Fences, Walls and Retaining Structures: Activity Status Restricted Discretionary Discretion is restricted to: a. Design and location of structures b. Height of structure's c. Shading and dominance effects on adjoining sites
Frank O'Toole (S595)	S595.031	Whole Plan	Whole plan	Amend	This submission seeks any consequential amendments to give effect to the relief sought above.	Any consequential amendments to give effect to the relief sought above.
Freehold Properties (Investments) LLP (FP) (S73)	S73.001	Planning Maps and Overlays	Rezoning Requests	Amend	The established use of the site is not rural in nature and is not adequately recognised by the proposed General Rural zoning, noting that zone fails to adequately provide for the established visitor accommodation activity and its ongoing use and development. Land around the property is zoned Settlement zone, and includes land used for short	Zone 2902 Franz Josef Highway (Lot 3 DP 426218) as Settlement Zone in its entirety and any consequential amendments to the plan.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					term accommodation. The school is also nearby. A Settlement Centre Precinct zoning (SETZ - PREC2) would provide a means to align with the established use and the exercised resource consents (ref: 960102 & 040149).	
Freehold Properties (Investments) LLP (FP) (S73)	S73.002	Natural Hazards	Natural Hazards Rules	Amend	The Top 10 Holiday Park site is located within the proposed Flood Hazard Severe Overlay. The submitter requests some provision within the Natural Hazard chapter to provide for addition and alterations to the existing commercial buildings currently on the site.	Amend the relevant Natural Hazard chapter provisions to provide for additions and alterations to the existing commercial buildings currently on the Top 10 Holiday Park site. [Flood Severe Overlay] and any consequential amendments to the plan
Frida Inta (S553)	S553.001	General District Wide Matters	General District Wide Matters	Amend	Concerns with genetic modification at a district level.	Plan needs to address the issue of genetic engineering.
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)	\$553.003	How The Plan Works	Satutory Context	Amend	The Plan must follow and maintain effects hierarchy	This Plan could take an excerpt out of RPS Chapter 2, Significant Resource Management Issues for the West Coast, second to last paragraph of the chapter
Frida Inta (S553)	S553.004	Interpretation	Definitions	Amend	Define offset and compensation	Offsetting and compensation are not defined in this Plan which is an egregious omission
Frida Inta (S553)	S553.005	Whole Plan	Whole plan	Oppose	The number of activities proposed as controlled and restricted discretionary.	Amend activities proposed as controlled and restricted discretionary to discretionary
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

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						objectives
Frida Inta (S553)	S553.007	Interpretation	SITE	Amend	The glossary definition of 'site' needs to be changed	'Site' is used interchangeably through this Plan as both legal title to land and as a site of some activity not regarded as being equivalent to the nature of a legal title.
Frida Inta (S553)	S553.008	Interpretation	SITE	Amend	'Site' is used interchangeably through this Plan as both legal title to land and as a site	all references in this Plan to 'site' need to be amended to reflect the glossary meanings of, 'Title', and, 'Site'.
Frida Inta (S553)	\$553.009	How The Plan Works	How The Plan Works	Amend	These clauses need to be included in this Plan; it may relate to RMA s17.	1. No person may use any land in a manner which contravenes a rule in this Plan unless the activity is expressly allowed by a resource consent, or is an existing use allowed by Section 10 of the Act. 2. Any activity which is not specifically referred to in the Plan or does not fall within the limits of permitted, controlled or discretionary activities is deemed to be a noncomplying activity and will require a resource consent.
Frida Inta (S553)	S553.010	Infrastructure	Infrastructure	Amend	There needs to be mention of municipal waste, and waste management in general.	Amend to include municipal waste, and waste management in general.
Frida Inta (S553)	S553.011	How The Plan Works	How The Plan Works	Amend	This Plan needs to make clear the penalties which can be meted out for breaches of the Plan.	Explanation on enforcement and compliance
Frida Inta (S553)	S553.012	Coastal Environment	Coastal Environment	Amend	CE - Coastal Environment, should be within the 'Natural Environment Values' collection	Move Section to Natural Environment Values
Frida Inta (S553)	S553.013	Whole Plan	Whole plan	Amend	Reference the RMA section the chapter refers to.	Amend the introduction to all chapters to refer to the relevant section of the RMA section the chapter refers to
Frida Inta (S553)	S553.014	Whole Plan	Whole plan	Amend	A number of cross-references are included in the Plan	Cross-references to include the page number of the cross-reference or add an

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						electronic cross reference for online plan
Frida Inta (S553)	S553.015	Planning Maps and Overlays	Planning Maps and Overlays	Amend	Trying to delineate zones in the interactive map is hard work.	Amend planning maps special zone shading and highlight zone information
Frida Inta (S553)	S553.016	Whole Plan	Whole plan	Amend	The use of formal language	English language syntax and systematics are applied to this Plan
Frida Inta (S553)	S553.017	Introduction	Introduction	Amend	There were also pas at Carters Beach (Westport) and Hokitika River (Westland)	Include other pa sites such as Carters Beach (Westport) and Hokitika River (Westland) in introduction
Frida Inta (S553)	S553.018	How The Plan Works	Satutory Context	Amend	The top tier of the hierarchy is missing.	amend to put the RMA in a box at the top of the family tree.
Frida Inta (S553)	S553.019	How The Plan Works	Satutory Context	Amend	There should also be a list of other relevant legislation	Add new section to list other relevant legislation, plans and documents: When administering the Plan and assessing resource consent applications Council must also consider under Section 104 other relevant regulations, legislation, plans and documents including the following:
Frida Inta (S553)	S553.020	How The Plan Works	Legal effect of Rules	Amend	To eliminate the Plan status statement at the time the Plan is finally operative.	Amend when plan is operative
Frida Inta (S553)	S553.021	Interpretation	INTENSIVE INDOOR PRIMARY PRODUCTION	Amend	Dairy farming intensity increases the potential to contaminate fresh and coastal waters.	Amend: Areas used predominantly for primary production activities, including intensive indoor and outdoor primary production
Frida Inta (S553)	S553.022	Interpretation	Interpretation	Amend	An explanation of riverbank in relation to riparian margins and margins of wetlands.	Add new definition: Bank A streambank or riverbank is defined as the edge of the defined channel or riverbed or where this is not obvious, the point at which terrestrial vegetation (eg:

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						grassland, shrubland or forest) commences. The boundary of a natural wetland margin is where indigenous wetland plants (ie: those indigenous plants such as sedges and rushes adapted to living in wet conditions) give way to other species. The boundary of a tidal wetland is defined as the point of mean high water springs (MHWS).
Frida Inta (S553)	S553.023	Interpretation	CEMETARIES	Amend	correct spelling error	Amend Cemetaries to Cemeteries
Frida Inta (S553)	S553.024	Interpretation	Definitions	Amend	Definitions from the Buller District Plan.	Ecological District/Region Levels used for the ecological classification of land. Currently New Zealand is divided into 269 ecological districts and 65 ecological regions according to geological, topographical, climatic and biological features and processes and human activities, which interrelate to produce a characteristic landscape and range of biological communities. Environment Environment includes:(a) Ecosystems and their constituent parts, including people and communities; and(b) all natural and physical resources; and(c) amenity values; and(d) the social, economic, aesthetic and cultural conditions which affect the matters stated in paragraphs a-c of this definition or which are affected by those matters. Factory Farming Farming which is not dependent on the fertility of the soil on which it is located or which takes place substantially within buildings or other structures, for example, poultry farming, pig farming, rabbit farming, mushroom farming, pot grown nursery

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						and glasshouses which have other than an earth floor.ReserveAny land set apart for any public purpose, as defined in the Reserves Act 1977. There are different types of reserves administered by organisations and the word 'reserves' in this Plan can refer to these reserves.
Frida Inta (S553)	S553.025	Interpretation	Definitions	Amend	Definition from the Buller District Plan.	Add: Indigenous vegetation clearance means the felling, clearing, destroying or removal of indigenous vegetation by any means, including cutting, crushing, cultivation, irrigation, chemical application, drainage, stopbanking, overplanting, or burning for any purpose including vehicle tracking, but excluding the clearance of indigenous vegetation forming an under storey within an exotic plantation forest.
Frida Inta (S553)	S553.026	Interpretation	Definitions	Amend	From the NES Plantation Forestry 2017.	Plantation forest means a forest deliberately established for commercial purposes, being (a) at least 1 ha of continuous forest cover of forest species that has been planted and has or will be harvested or replanted; and (b) includes all associated forestry infrastructure; but (c) does not include-(i) a shelter belt of forest species, where the tree crown cover has, or is likely to have, an average width of less than 30 m; or(ii) forest species in urban areas; or(iii) nurseries and seed orchards; or(iv) trees grown for fruit or nuts; or(v) long-term ecological restoration planting of forest species; or(vi) willows and poplars space

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						planted for soil conservation purposes
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)	S553.028	Interpretation	Definitions	Amend	More protection must be provided to our major rivers and their riparian margins	There needs to be a cross-reference to, 'Bank'. in the Riparian margin definition
Frida Inta (S553)	S553.029	Interpretation	Definitions	Amend	The difference between intermittent and ephemeral needs to be quantified.	Add a cross reference to the Regional Land and Water Plan
Frida Inta (S553)	S553.030	Interpretation	Definitions	Amend	There might be other sensitive activities not listed here.	Sensitive activity Includes but is not limited to
Frida Inta (S553)	S553.031	Interpretation	Definitions	Amend	To say that these three activities relate to land only.	Amend definition for Subdivision, use and development to refer to land only
Frida Inta (S553)	S553.032	Glossary	Glossary	Amend	This is not a glossary, it is Language Translation.	Amend Glossary to Maori/ English Translation
Frida Inta (S553)	S553.033	Abbreviations	Abbreviations	Amend	NOT 'Abbreviations' rather 'Acronyms'	Amend title from Abbreviations to Acronyms
Frida Inta (S553)	S553.034	National Direction Instruments	National Direction Instruments	Support	This is an important inclusion.	retain
Frida Inta (S553)	S553.035	STRATEGIC DIRECTION	Strategic Directions Overview	Amend	Consistency with WC-RPS, Chapter 7, Objective 4	Fostering the use and development of natural and physical resources whilst protectingthe natural values including those that have been elevated to matters of national importance by the Resource Management Act 1991 and those matters of national and regional significance by National and Regional Policy Statements;
Frida Inta (S553)	S553.036	Rural Zones	AG	Amend	There needs to be rules around the use of agrichemicals.	AGRICHEMICALSThese extracts from Waikato District council need to be incorporated into the Te Tai o Poutini

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						Plan. Policy 1: Application of AgrichemicalsAllow by rules and encourage by other methods, the application of agrichemicals in a manner that avoids the significant adverse effects of off-target exposure to agrichemicals (as identified in Policy 1) beyond the boundary of the property being sprayed. Policy 2: Sensitive AreasRecognise that some areas, places or features are sensitive to the adverse effects off off-target exposure to agrichemicals, including, but not limited to:a) dwelling-housesb) places of public assembly* and public amenity areas*c) domestic and community water suppliesd) water bodies69 and the banks of a water bodye) habitats of significant indigenous flora and fauna (as defined in district plans and Department of Conservation Management Strategies)f) plants and/or crops which are sensitive to agrichemical(s) being dischargedg) certified organically farmed propertiesPermitted Activity Rule - Spot Spraying Using Hand Held Spray EquipmentThe discharge of agrichemicals from the ground into air, and any consequent discharge onto land, using hand held spray equipment for spot spraying is apermitted activity subject to the following conditions:a) The discharge does not occur in a public amenity area.b) The agrichemical(s) shall be discharged in a manner that does not contravene any requirement specified in the manufacturer's instructions.c) The

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						discharge shall be undertaken in such a way that no significant adverse effect of off-target drift shall occur beyond the boundary of the property being sprayed.d) The owner or occupier of the property on which spraying is to be undertaken, is required to notify anyone who has requested prior notification. Notification shall be either verbal or in writing and shall be provided between 12 hours and three weeks prior to the commencement of the discharge. Notification shall include the:i) date the agrichemical(s) is to be dischargedii) type of agrichemical(s) to be usediii) location of the dischargeiv) duration of the dischargev) method of discharge.e) Where the agrichemical is being applied in a situation where it may enter water, any downstream water user within one kilometre of the point of discharge must be notified between 12 hours and three weeks prior to commencement of the discharge.Permitted Activity Rule - Widespread Application of Agrichemical(s)Unless provided for in Rule 6.2.4.8, the discharge of agrichemical(s) into air, into water and into or onto land is a permitted activity subject to the following conditions:a) The agrichemical(s) shall be discharged in a manner that does not contravene any requirement specified in the manufacturer's instructions.b) The discharge shall be undertaken in such a way that no significant adverse effect of off-target drift shall occur beyond the boundary of the property being

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						sprayed.c) Where the agrichemical is being applied to vegetation on the banks and bed of water bodies:i) the application and consequent breakdown of vegetation shall not result in the contamination of domestic or commercial water supplies, or the death of fauna (and/or residues being detected in fish).ii) Where agrichemicals are applied directly to water any downstream water take within one kilometre of the point of discharge must be notified between 12 hours and three weeks prior to commencement of the discharge.d) Within twelve months of the Plan (or this rule) becoming operative:i) Every person undertaking the application of agrichemicals shall have a qualification certified in writing that meets the performance requirements set out in Section 6.2.10, or be under the direct supervision of a person who meets those requirements, orii) Every contractor or contractor employee undertaking the land based application of agrichemicals shall hold or be under the on site supervision of a person who holds a current National Certificate in Agrichemical Application, a GROWSAFE® Registered Chemical
						Applicators Certificate or a qualification that meets the performance requirements for contractors and
						contractor employees in Section 6.2.10iii) Every pilot undertaking the aerial application of agrichemicals shall

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						equivalent qualification.e) The application of agrichemicals shall be undertaken in accordance with New Zealand Standard 8409:2004, Management of Agrichemicals75.f) The owner, occupier, or manager of the property to be sprayed shall prepare a spray plan, or shall arrange for a spray plan to be prepared, at the beginning of each year or spray season, and the spray plan shall:i) contain as a minimum the information as outlined in Section 6.2.7 of this Plan or with reference to A ppendix M4 of New Zealand Standard 8409:2004, Management of Agrichemicals.ii) be given to any person within seven days of that person requesting the spray plan.iii) Notwithstanding the requirements of part i) of this condition, for local authority parks and reserves, road side spraying operations and community based spray programmes where the spraying activities for which spray plans are required cover more than 10 properties a single spray plan can be prepared on an annual basis covering all operations. This spray plan must identify as a minimum all known sensitive areas likely to be affected by the activity and the strategies to be employed to avoid adverse effects on those areas (e.g. specific application techniques, specific notification practices, buffer zones, manning boundaries, restrictions on climate conditions when spraying can occur etc). The plan must be provided to the
						contractor/applicator prior to spraying

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						commencing. New Zealand Standard 8409:2004 Management of Agrichemicals. This document can be obtained from Standards New Zealand, Private Bag 2439, Wellington 6020The Discharge of Agirchemicals into Air 6-55g) The owner, occupier, or manager of the property to be sprayed shall keep and maintain records of agrichemical use, or shall arrange for records to be kept. These records shall, as a minimum, include the information in Appendix C of the New Zealand Standard 8409:2004 Management of Agrichemicals.h) The owner, occupier, or manager of the property to be sprayed must follow the relevant notification requirements listed in Table 6-4 of this Plan Ground based application on private* property within 50 m of boundary:1. The owner, occupier, or manager of the property to be sprayed shall either:a) provide verbal or written notification to owner(s), or occupier(s) of adjoining properties or to any other person requesting notification between 12 hours and three weeks prior to spraying, orb) Provide written advice (at least once a year) to any person who is likely to be directly affected by spray applications that a spray plan prepared in accordance with condition f) of this rule is available on request. Notification procedures that have been mutually agreed by the parties shall be specified and noted in the spray plan.c) And in

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						will not be required if written permission has been obtained from them stating that notification can be in some mutuallyagreed form or that notification is not required.2. Where the boundary is with a public amenity area or place of public assembly the discharger shall place signs so that they are clearly visible to the public at all points where the public commonly have entry, to indicate that agrichemical(s) are being sprayed. The signs shall remain in place for a period equivalent to the contact re-entry time* for the agrichemical(s)The discharge shall be undertaken in such a way that no significant adverseeffect of off-target drift shall occur beyond the boundary of the property beingsprayed.
Frida Inta (S553)	S553.037	STRATEGIC DIRECTION	Connections and Resilience Strategic Objectives	Amend	To recognise that intact ecosystems provide resilience.	New Objective; CR 05 To recognise that intact ecosystems provide resilience via ecosystem services and climate stability
Frida Inta (S553)	S553.038	STRATEGIC DIRECTION	Mineral Extraction	Amend	Consistency with WC-RPS, chapter 7, Objective 4.	Amend a. Avoid, remedy or mitigate the adverse effects of mineral extraction activities on the West Coast/Te Tai o Poutini's terrestrial and freshwater indigenous biological diversity, including significant natural and cultural features, sites and heritage, and amenity values,
Frida Inta (S553)	S553.039	STRATEGIC DIRECTION	MIN - O6	Oppose	Do not see the need for it.	Amend: Allow adverse effects in certain situations to be addressed, when avoidance, remediation or mitigation fails, by alternative mitigation measures such as biodiversity offsetting and environmental

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						compensation. Significant adverse effects that require offsetting or environmental compensation will be subject to a public notification process.
Frida Inta (S553)	S553.040	STRATEGIC DIRECTION	NENV- O1	Amend	The POU (POU - 03) chapter covers this.	NENV 01 To recognise and protect the natural character, landscapes and features, ecosystems and indigenous biodiversity that contribute to the West Coast's character and identify and Poutini Ngai Tahu's cultural and spiritual values.NENV-02 To ensure that the rights, interests and values of Poutini Ngai Tahu to natural environment areas and features are protected and provided for and that the ability to exercise kaitiakitanga and tino rangatiratanga is maintained and enhanced.
Frida Inta (S553)	S553.041	STRATEGIC DIRECTION	NENV - O3	Amend	consistency with WC-RPS, Ch7, Ob 4	03 a. The substantial contribution to the protection of natural environment values that is made by the existence of public conservation land in protecting the region's terrestrial and freshwater indigenous biological diversity and significant areas, habitats and features; c. The need to support the ethic of stewardship and to consider the positive effects of the conservation estate and significant natural areas in achieving the requirements of the RMA.
Frida Inta (S553)	S553.042	STRATEGIC DIRECTION	POU - 01	Amend		P5 Poutini Ngāi Tahu should be able to freely access recognised mahinga kai sites and cultural materials in accordance with tikanga and to support community wellbeing. P10 Protect Poutini Ngāi Tahu taonga and

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						cultural sites, including sites and areas of significance to Māori identified in Schedule Three while and ensureing Poutini Ngāi Tahu's key role in decision making around their management.
Frida Inta (S553)	S553.043	Infrastructure	INF - R9	Amend	Would allow a cellphone tower to be built without resource consent.	Change to discretionary activity
Frida Inta (S553)	S553.044	Energy Infrastructure and Transport	Energy Infrastructure and Transport	Amend	Above the treeline scarring is very obvious.	R10; a Visual impacts on landscapes above the treeline ever 1000m above sea level;
Frida Inta (S553)	S553.045	Contaminated Land	Contaminated Land	Support		retain
Frida Inta (S553)	S553.046	Hazardous Substances	HS - 01	Amend	There must be a holistic approach to the use of hazardous substances.	Amend The benefits associated with the use of hazardous substances are recognised while ensuring that risks to the environment and human health arising from subdivision use and development or any other activities involving hazardous substances are minimised.
Frida Inta (S553)	S553.047	Hazardous Substances	HS - 01	Support	consistent with 4.11.5.1 of the Buller District Plan.	Amend: To encourage and promote the safe and efficient handling and disposal of hazardous substances throughout the District.
Frida Inta (S553)	S553.048	Hazardous Substances	Hazardous Substances Policies	Amend	consistent with 4.11.6.1 of the Buller District Plan.	Add: Compliance with approved codes of practice and national guidelines and standards shall be required for all activities involving the use, storage and transport of hazardous substances.
Frida Inta (S553)	S553.049	Hazardous Substances	HS - P1	Amend	No excuse for even residual risk to people or environment, there has to be NO risk.	HS - P1 Activities and facilities involving the use and storage of hazardous substances shall be designed, located, constructed and operated so as to avoid

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						minimise residual risk to people and the environment
Frida Inta (S553)	S553.050	Natural Hazards	Natural Hazards Rules	Amend	Not sure 300mm above 1% annual flood exceedance is high enough.	Amend R8 and all NH rules with higher flood annual flood exeedance
Frida Inta (S553)	S553.051	SCHED1A- SCHEDULE OF HISTORIC HERITAGE ITEMS AND AREAS	SCHED1A - SCHEDULE OF HISTORIC HERITAGE ITEMS AND AREAS	Amend	It is important that any known sites are recorded.	record all known sites in Schedule 1 and Appendix 10
Frida Inta (S553)	S553.052	SCHED1A- SCHEDULE OF HISTORIC HERITAGE ITEMS AND AREAS	SCHED1A - SCHEDULE OF HISTORIC HERITAGE ITEMS AND AREAS	Amend	Arch record L28/36 is the railway heritage at the Chasm Creek Walkway.	add Arch record L28/36 the railway heritage at the Chasm Creek Walkway.
Frida Inta (S553)	S553.053	SCHED1B - SCHEDULE OF ARCHEOLOGI CAL SITES	ARCH2	Amend	Mokihinui Cemetery is depicted as Arch 2 on map but is listed as Arch 3 in Schedule 1B	Amend label for Mokihinui Cememtery Schedule 1B
Frida Inta (S553)	S553.054	SCHED1B - SCHEDULE OF ARCHEOLOGI CAL SITES	SCHED1B - SCHEDULE OF ARCHEOLOGICAL SITES	Amend	There is a midden at Mokihinu where a stone adze was found.	Add to Schedule 1B;midden site at Mokihinu site locations
Frida Inta (S553)	S553.055	Notable Trees	Notable Tree Policies	Amend	Tree P5(e) BCG is concerned that this policy clause could provide a loopholr.	Amend Policy P5(e) Add P7 Allow for the inclusion and protection of further notable trees within thedistrict without requiring any plan change
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, subject to other rules and regulations around indigenous vegetation clearance

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
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 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
Frida Inta (S553)	\$553.058	Ecosystems and Indigenous Biodiversity	Overview	Amend	The coastal highway breaks through and fragments any otherwise continuous ECO.	Amend Paragraph 2 & 3: In a number of many 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 (albeit the majority of that land is mountainous) - compared with 24% nationally. 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, Oligosoma aff infrapunctatum, found as recently as 2015, predominantly in the Buller, is now functionally extinct. The at risk Shore spurge, Euphorbia glauca, and the nationally endangered Coastal cress, Lepidium flexicule, can be found along the West Coast. Our estuaries are home to the nationally critical dotterel, Charadriidae o. obscurus. It is essential that we protect the habitats of these endangered species.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Frida Inta (S553)	\$553.059	Natural Environment Values	Natural Environment Values	Amend	it is not the Plan but the authority that is responsible.	Territorial authorities are Te Tai o Poutini Plan is responsible for protecting and maintaining terrestrial(land-based) ecosystems, including the margins of the coast and waterbodies
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-territorial authorities Te Tai o Poutini Plan to manage indigenous biodiversity in two particular ways including through sections 31 and 17.
Frida Inta (S553)	S553.061	Ecosystems and Indigenous Biodiversity	Overview	Amend	Wording and reference around coastal environment needs to be pulled together.	Amend Rules to rules. Add to Overview: 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.
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
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 05 Recognise the ecosystem services that intact SNAs provide for the resilience of both human and indigenous habitat.
Frida Inta (S553)	S553.064	Ecosystems and Indigenous Biodiversity	ECO- 01	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 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 on the West Coast/Te Tai o

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						Poutini
Frida Inta (S553)	S553.065	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity Policies	Amend	Not all significant areas may have been identified.	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
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 less no more than minor adverse effects on the significantindigenous vegetation or fauna habitat.
Frida Inta (S553)	\$553.067	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 and natural indigenous character by 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
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
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 ensures less than minor minimises adverse effects on any significant values of the

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						vegetation or fauna habitat
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 resource consent process subdivision, use or development; d The cumulative adverse effects on biodiversity of activities within or adjacent to any area of significant indigenous vegetation or habitat; and the cumulative effects within the catchment/ district; g. The impact of the activity on the values of any area of significant indigenous vegetation or habitat, and how any potential impact could firstly be avoided, and if that is not possible then consider using the adverse effects hierarchyremedied or mitigated
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 indigenous biodiversity, including the functioning of ecological corridors, linkages, wetlands and dunes, and indigenous coastal vegetation and wetlands; e Recognising that the benefits of active management of indigenous biodiversity, such as including voluntary animal and plant pest and stock control and/or formal legal protection, provides benefits such as ecosystem services.
Frida Inta (S553)	S553.072	Ecosystems and	ECO - P9	Amend		Provide for biodiversity offsets and compensation to manage residual adverse effects of an activity where any attempt

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
		Indigenous Biodiversity				to avoid, remedy or mitigate adverse effects has failed where:
Frida Inta (S553)	S553.073	Ecosystems and Indigenous Biodiversity	ECO - P10	Amend	there is an overlap with ECO - P8 (c)	Amend to address overlap
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: per site to read per site or per (ha size), which ever is the larger
Frida Inta (S553)	S553.077	Ecosystems and Indigenous Biodiversity	ECO - R2	Oppose	Creating walking/cycling tracks should not be a permitted activity.	amend per site to be per site or per (ha size), which ever is the larger
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
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: 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.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Frida Inta (S553)	\$553.080	Natural Features and Landscapes	Overview	Oppose	RMA, s7(d) and s5(b) these statutory conditions need to be mentioned.	Amend NFL chapter: 'natural character' in the objectives and policies, and all rules need to refer to protection of it;
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
Frida Inta (S553)	S553.082	Natural Features and Landscapes	NFL - P4	Amend	To enhance the qualities and characteristics of the NFL.	Insert d Landscaping buildings and structures with appropriate vegetation to soften outlines
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, including any adverse effects on natural character; h. Any positive effects on identified characteristics and qualities at a regional and local level;
Frida Inta (S553)	S553.084	Natural Features and Landscapes	NFL - P6	Amend		Subject to policies 1 - 5, eEnable 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)	S553.085	Natural Features and Landscapes	NFL - P7	Amend		Subject to policies 1 - 5, e≣nable
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.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
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.	Amend to incorporate Policies 4 & 5
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 or 4ha whichever is the larger.
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.	3. to be subject to rules in ECO and rules and policies in NFL.
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 needs to be minimal with low visual impactCross-reference with WCRC Land and Water Plan.
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.
Frida Inta (S553)	S553.093	Public Access	Overview	Amend	There needs to be a cross-reference to Natural Character, NC; P5.	A cross-reference to Natural Character, NC; P5
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: Natural Character and the margins of waterbodies require protection as a matter of national importance under Section 6(a) of the RMA.
Frida Inta (S553)	S553.095	Natural Character and Margins of Waterbodies	NC - 01	Amend	'appropriate' needs explanation.	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 or mitigated.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
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
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, subject to regional rules , with where significant adverse effects on natural character are minimized as far as practicable, and:
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.
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)	S553.100	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.	have a functional need to be located in the riparian margin.
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.	have a functional need to be located in the riparian margin.
Frida Inta (S553)	S553.102	Subdivision	Overview	Amend		This section of Te Tai o Poutini Plan contains for development of infrastructure and West Coast/Te Tai o Poutini. Currently the three District Councils on the West Coast/Te Tai o Poutini the costs and impacts of private development on Council infrastructure approach continuing.
Frida Inta (S553)	S553.103	Subdivision	SUB - P1	Oppose	P1 - P2 adequately covers what P1 is trying to say.	delete

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Frida Inta (S553)	S553.104	Subdivision	Subdivision Rules	Amend	The Buller District Plan matters need to be transferred into this chapter.	Add 1. Where any allotment of 4ha or more is created when land adjoining the Coastal Marine Area is subdivided, other than as a result of a boundary adjustment, an esplanade strip of 20m shall be set aside in the new lot along the mark of Mean High Water Spring of the sea and along the bank of any river or margin of any lake.2. Where any allotment of 4ha or more is created when land is subdivided, other than applies under 1. above, or as a result of a boundary adjustment, an esplanade strip of 20m shall be created from that allotment along the bank of any river or margin of any lake. This requirement for an esplanade strip does not apply where a legal road (formed or not) provides adequate access to the water body. This rule only applies to lakes and rivers as defined in section 230(4) of the Resource Management Act 1991.3. An esplanade strip required under 1. or 2. above may on application be reduced in width or dispensed with altogether. In considering any such application the Council shall take into account the matters below.
Frida Inta (S553)	S553.105	Subdivision	SUB - O2	Amend	It is not only significant natural areas that need protection.	g. protects and enhances amenity values
Frida Inta (S553)	S553.106	Subdivision	SUB - O3	Amend	It is not only significant natural areas that need protection.	Subdivision design and development protects the quality of the environment including the intrinsic value of ecosystems and significant coastal, natural, ecological, historical and Poutini Ngāi Tahu features and resources and responds to the physical characteristics and constraints of

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						the site and surrounding environment.
Frida Inta (S553)	S553.107	Subdivision	SUB - O4	Support	to support P 05(e)	protects valuable horticulture land from urban sprawl
Frida Inta (S553)	S553.108	Subdivision	SUB - O5	Amend	SNAs being recognised in the Buller needs to be recognised throughout this chapter.	Esplanade reserves and strips created through subdivision contribute to the protection of identified significant natural heritage and Poutini Ngāi Tahu values, provide natural hazard mitigation
Frida Inta (S553)	S553.109	Subdivision	SUB - P1	Amend		d. Protects the significant cultural, historical, natural and ecological features sites and areas identified on the planning maps and in the Schedules in the Plan; and
Frida Inta (S553)	S553.110	Subdivision	SUB - P2	Amend	Use less water and are therefore unlikely to contaminate fresh water	(i) consider composting toilets, which use less water and are therefore unlikely to contaminate fresh water
Frida Inta (S553)	S553.111	Subdivision	SUB - P3	Amend	There needs to be some explanation around subdivision within riparian margins.	Provide for the subdivision of land within or containing riparian margins, natural character, outstanding natural features and landscapes, a Not compromise the identified characteristics and values of identified in the Overlay Chapter it is located within;
Frida Inta (S553)	S553.112	Subdivision	SUB - P6	Amend	the adverse effects hierarchy is not being followed here.	e. In the c Coastal environment outside of areas that are already modified unless adverse effects on the natural character of the coastal environment can be avoided or mitigated;
Frida Inta (S553)	S553.113	Subdivision	SUB - P9	Amend		To require esplanade reserves or esplanade strips to the protection of natural character and biodiversity values

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						including corridors for native fauna,
Frida Inta (S553)	S553.114	Subdivision	SUB - R2	Amend	Grammer	4 Where the The site is less than 4ha adjacent to a river >3m wide or the coast, the provision of an esplanade reserve or strip of 20m;
Frida Inta (S553)	S553.115	Subdivision	SUB - R3	Amend	It could be read that a small amount of that area could be cleared as deemed insignificant.	f Protection, maintenance or enhancement of natural features and landforms, areas of significant indigenous biodiversity, amenity values, historic heritage, sites of significance to Māori, archaeological sites or any other identified features.
Frida Inta (S553)	S553.116	Subdivision	SUB - R5	Amend	It could be read that a small amount of that area could be cleared as deemed insignificant.	k Effects on Poutini Ngāi Tahu values, existing amenity values, the quality of the environment, natural character, notable trees or historic heritage within or adjacent to the site;
Frida Inta (S553)	S553.117	Subdivision	SUB - R7/ECO - R4	Support	It could be read that a small amount of that area could be cleared as deemed insignificant.	3 or the need for clearance within the area of significant indigenous vegetation to provide for future access to any site;
Frida Inta (S553)	S553.118	Subdivision	SUB - P9	Support	There should be a minimum distance/ buffer from SNA to buildings, etc	3. There should be a minimum distance/buffer from SNA to buildings or other development such as access/ roads.
Frida Inta (S553)	S553.119	Subdivision	SUB - R11	Amend	R11 Should be discretionary	change activity status to Discretionary
Frida Inta (S553)	S553.120	Subdivision	SUB - R12	Amend	amend matters for discretion	g Effects on Poutini Ngāi Tahu values, existing amenity values, the quality of the environment, natural character, notable trees or historic heritage within or adjacent to the site;

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Frida Inta (S553)	S553.121	Subdivision	SUB - R15/ECO - R8	Amend	R15 Should be a mandatory buffer zone	insert a minimum distance/ buffer from SNA to buildings or other development such as access/ roads.
Frida Inta (S553)	S553.122	Subdivision	SUB - S6	Amend	Need to provide for safe bicycle and pedestrian use	3to provide for safe bicycle and pedestrian use
Frida Inta (S553)	S553.123	Subdivision	SUB - S9	Amend	The bank of a river whose bed has an average width of 3m or greater.	1.c. The bank of a river whose bed has an average width of 3m or greater.
Frida Inta (S553)	\$553.124	Activities on the surface of water	ASW - R2	Amend	It appears only Runanga/ lwi - approved sites that are being considered as restrictive.	1Lake Christobel, Lake Hanlon, Kohaihai River In the following water bodies, the use of motorised water craft with an engine capacity of greater than 5 horse power is prohibited:• Lake Daniells• Punakaiki River: upstream of the road bridge.• Pororari River: upstream of the road bridge.• Otomahana Lagoon• Orowaiti River: upstream of the rail bridge.• Okari: upstream of the road bridge.
Frida Inta (S553)	S553.125	Activities on the surface of water	ASW - R6	Amend	There needs to be a list of waterbodies where commercial activities are not acceptable.	Extend list of waterbodies to include those where commercial activities are not acceptable
Frida Inta (S553)	S553.126	Coastal Environment	Overview	Oppose	'Coastal Environment' should be in the Natural Environment Values chapter.	put 'Coastal Environment' should be in the Natural Environment Values chapter
Frida Inta (S553)	S553.127	Coastal Environment	CE - O1	Amend	Should be separated into 2 objectives; one providing for protection, the other for exploitation.	separate into 2 objectives
Frida Inta (S553)	S553.128	Coastal Environment	CE - P5	Amend	This aligns with NZCPS	(e) adverse effects on natural character, natural landscapes and natural features are avoided;
Frida Inta (S553)	S553.129	Coastal Environment	CE - P6	Support	The built environment should not encroach into unmodified areas.	b. Where located in unmodified areas, any adverse impact on natural character can

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						be mitigated;
Frida Inta (S553)	S553.130	Coastal Environment	CE - P8	Amend	Isn't P8 repeating P3? The 2 need to be combined.	Where new development and upgrades of the National Grid are required in areas indicated in Overlay Chapter areas, seek to avoid and or otherwise remedy or mitigate adverse effects. on Overlay Chapter areas.
Frida Inta (S553)	S553.131	Coastal Environment	CE - R4	Amend	NZCPS requires coastal biodiversity to be protected as does RMA s6(a).	1.e. unmodified coastal area or area of high natural biodiversity
Frida Inta (S553)	S553.132	Coastal Environment	CE - R5	Amend	Height restriction needs to be applied; other zones should have a lower maximum height.	Lower height restriction in Coastal Environment
Frida Inta (S553)	S553.133	Coastal Environment	CE - R16	Amend	R16 Should be discretionary, not restricted discretionary.	change R16 to Distcretionary
Frida Inta (S553)	S553.134	Coastal Environment	CE - R17	Amend	R17. 1. L There is a functional need to be located in that area	1.L. There is a functional need to be located in that area
Frida Inta (S553)	S553.135	Coastal Environment	CE - R17	Oppose	There should be no plantation forestry within the outstanding coastal environment.	Delete
Frida Inta (S553)	S553.136	Coastal Environment	CE - R22	Oppose	Needs to be prohibited Destroying such features will destroy important values.	Delete
Frida Inta (S553)	S553.137	Earthworks	Overview	Amend	Too often drainage hydraulics are overlooked, its about time they were considered.	The scope and scale of earthworks range from large bulk earthworks, which can alter the landform, and its topography, and drainage hydraulics, to small and discrete areas of works most often associated with minor development
Frida Inta (S553)	S553.138	Earthworks	Overview	Amend	The WCRC L&W Plan has a strong focus on earthworks, including many rules.	A number of other regulatory and non- regulatory methods also manage the effects of earthworks, particularly addressed in the Regional Land and Water Plan.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Frida Inta (S553)	S553.139	Earthworks	EW - 01	Oppose	Protection of natural values must come before exploitation of those values.	Separate into 2 objectives, the first for protection of the natural environment, the second for exploitation of that environment.
Frida Inta (S553)	S553.140	Earthworks	Earthworks Policies	Amend	Protection of natural values must come before exploitation of those values.	P4 2 Manage the effects of earthworks to minimise impacts on landscape character, amenity, natural features, water quality, biodiversity, cultural and heritage sites and the quality of the environment. P-2 1 Enable temporary and small scale earthworks for the subdivision, use and development of land, the provision of utilities, and hazard mitigation, while managing those with the potential to create significant adverse effects.
Frida Inta (S553)	S553.141	Earthworks	EarthworksRules	Amend	'per site' needs to be changed.	R3 & R4 per site or 10% whichever is the greater
Frida Inta (S553)	S553.142	Earthworks	EW - R8	Amend	Unless the neighbours agree there should be NO adverse effects on that neighbour.	a The impact on visual amenity, landscape and natural character, outlook and privacy; d The effectiveness of proposed management or mitigation measures to avoid minimise any potential or actual adverse effects beyond the property boundary of the activity; e Any changes to the patterns of surface drainage or subsoil drains that could result in a higher risk of drainage problems, inundation run-off, flooding, or raise or lower the water table;
Frida Inta (S553)	S553.143	Light	Light Policies	Amend	When considering reflectivity, hard- standing or paved areas need to be considered.	New policy: All fixed exterior lighting shall, as far as practicable, be aimed, adjusted and/or screened to direct lighting away from the windows of habitable spaces of sensitive activities, other than residential units located in

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						industrial zones, so that the obtrusive effects of glare on occupants are minimised.
Frida Inta (S553)	S553.144	Light	Overview	Amend	There must be rules around the use of streetlights, particularly in areas sensitive to night light.	it may adversely affect the amenity of neighbourhoods, neighbouring properties and light sensitive areas; result in a reduction or loss loss or reduction of views of the night sky, cloud form and landscape views; and potentially disturb wildlife
Frida Inta (S553)	S553.145	Light	LIGHT - O1	Amend	1 O1 and O2 need to be separated out into pros and cons	Artificial outdoor lighting enables night- time work, rural productive activities, recreation activities, sport, entertainment activities, transportation and public health and safety, and maintains other amenity values within zones.
Frida Inta (S553)	S553.146	Light	LIGHT - O2	Amend	Character is more likely to be adversely affected by night lighting rather than enhanced.	Artificial outdoor lighting is located, designed and operated to maintain and protect the character and amenity values within zones and will so that it does not adversely affect the health and safety of people, or the safe operation of the transport network, it will protects views of the night sky and landscapes, the habitats, and species within habitats, and ecosystems of nocturnal native fauna and the species themselves.
Frida Inta (S553)	S553.147	Light	Light Policies	Amend	A repeat of P 1. c	P1; b Maintains the character and amenity values of the zone P1; e Protects the health and well-being of people and ecosystems

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Frida Inta (S553)	S553.148	Light	LIGHT - P3	Amend	Badly placed and directed streetlights can impact severely on peoples' enjoyment of life after dark.	e. Minimizes adverse effects on amenity values, the health and, safety and enjoyment of people and communities in the surrounding area.f. Minimizes light blindness caused by badly-directed light.
Frida Inta (S553)	S553.149	Light	Light Rules	Amend	There needs to be rules around district council-controlled streetlights.	Includes district council-controlled streetlights.
Frida Inta (S553)	S553.150	Light	LIGHT - R3	Amend	Tekapo has installed 2200K lighting to prevent light pollution of the night sky.	2 b. Have a colour corrected temperature of no greater than 2200K 3000K (warm white);
Frida Inta (S553)	S553.151	Light	LIGHT - R4	Amend	The intensity should be measured at the boundary, not inside the boundary.	c. The above standards a-b shall be measured at 2m inside the boundary
Frida Inta (S553)	S553.152	Light	LIGHT - R5	Amend	possibly visual amenity includes people and neighbourhoods	c Effects on visual amenity; people and neighbourhoods.
Frida Inta (S553)	S553.153	Noise	Overview	Amend	Where noise sensitive activities are established, reverse sensitivity effects can arise.	Add: Sensitivity can also arise when noisy industry sets up near existing peace-requiring activities such as a church or library.
Frida Inta (S553)	S553.154	Noise	NOISE - O1	Amend		Add: The benefits of noise generating activities, safety and wellbeing, nor impact on noise sensitive activities.
Frida Inta (S553)	S553.156	Noise	NOISE - R12	Amend	Repeated provision	g Effects on the health and wellbeing of people;
Frida Inta (S553)	S553.157	Signs	SIGN - P6	Amend		To sSupport the use of bilingual signage and the use of traditional Poutini Ngāi Tahu place names within the District.
Frida Inta (S553)	S553.158	Temporary Activities	Temporary Activities	Amend	All Temp rules need a clause to say so long as environmental values are not degraded.	add to rules environmental values are not degraded and that wildlife is not disturbed - e.g. temporary light could

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						severely disturb long-tailed bat foraging; motorsports' noise and air pollution could severely disturb nesting birds, as could the noise of military training camps.
Frida Inta (S553)	S553.159	Temporary Activities	TEMP - R6	Amend		Amend 3. to provide explanation as to what 'other temporary activities' are, including such as spatial size, expected number of people.
Frida Inta (S553)	S553.160	Planning Maps and Overlays	Rezoning Requests	Amend	LINZ lands in their natural state are not given enough protection of the values.	Include hydro and LINZ parcels in the plan as Natural Open Space Zones
Frida Inta (S553)	S553.161	Open Space and Recreation Zones	OSRZ - P14	Support	It cannot be allowed that mineral extraction occurs as a permitted activity in such zones.	Retain policy 14 (b)
Frida Inta (S553)	S553.162	Open Space and Recreation Zones	OSRZ - P1	Oppose	Mentioning that DOC and its statutes are exempt under s4(3) should be sufficient.	Delete
Frida Inta (S553)	S553.163	Open Space and Recreation Zones	OSRZ - P14	Amend		retain b. c. Adverse effects on open space and recreation values and the environment are addressed following the adverse effects hierarchy. are avoid, mitigated, remedied, offset or compensated;
Frida Inta (S553)	S553.164	Natural Open Space Zone	Overview	Amend		The purpose of the NOSZ - Natural Open Space Zone is to recognise and provide for open spaces that contain high natural, ecological and landscape values. The zone also applies to a variety of parks and reserves, coastal and riverside esplanade reserves, scenic reserves, local purpose reserves and recreation reserves and many areas of LINZ land, particularly

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						that of rivers and estuaries
Frida Inta (S553)	S553.165	Open Space Zone	OSZ - R19	Amend	Does this mean conservation activities, or does it mean impacts on conservation concerning its values?	clarify meaning of conservation h. Effects on any natural character, biodiversity and threatened fauna or their habitats;
Frida Inta (S553)	S553.166	Commercial and Mixed Use Zones	CMUZ - O1	Amend		To maintain and enhance the character, including historical heritage, and amenity values of commercial areas and town centres.
Frida Inta (S553)	S553.167	General Industrial Zone	GIZ - R1	Amend	This inclusion should apply to the relevant clauses of other zone types also.	There shall be no offensive or objectionable dust nuisance, odour or air pollution at or beyond the LIZ - Light Industrial Zone boundary as a result of the activity;
Frida Inta (S553)	S553.168	Residential Zones	Residential Zones - Objectives	Amend	Air pollution can be a serious problem in residential areas.	Add new objective for Air pollution in residential or settlement areas that may be subject to odour and smoke. Air pollution will prevent wildlife from establishing, or re-establishing in residential areas.
Frida Inta (S553)	S553.169	General Residential Zone	GRZ - R5	Oppose	A lot of vehicle disturbance in a residential area, including domestic animals and wildlife.	Amend to require Neighbours and/or Community approval
Frida Inta (S553)	S553.170	General Residential Zone	GRZ - R22	Amend	Air pollution needs to be added in	No external generation of dust, air pollution, odour or smoke occurs as part of the activity.
Frida Inta (S553)	S553.171	Large Lot Residential Zone	LLRZ - R1	Amend	It should not be mandatory to connect if a viable alternative is available.	Amend: all residential units and buildings used for a residential activity must be connected to the community water supply and wastewater networks if these services are provided

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Frida Inta (S553)	S553.172	Rural Zones	Overview	Amend		3rd paragraphor their proximity to resource extraction sites or the main centres meaning they are becoming more like commuter areas.
Frida Inta (S553)	S553.173	Rural Zones	Rural Zones Objectives	Amend		O8 Protect indigenous biodiversity, including SNA's and natural character andwatebodies from encroaching rural development, particularly residential spread.
Frida Inta (S553)	S553.174	Rural Zones	RURZ - P1	Amend		g Protect indigenous biodiversity and natural character and waterbodies from inappropriate development.
Frida Inta (S553)	S553.175	Rural Zones	RURZ - P22	Amend		P22 Sites used for mineral extraction must should be rehabilitated to enable the land to be used for other activities appropriate to the area.
Frida Inta (S553)	S553.176	Rural Zones	RURZ - P25	Amend	Air pollution needs to be added to any relevant clauses managing dust etc in the zones pertaining to residents.	Avoiding or mitigating impacts on indigenous biodiversity including significant indigenous vegetation and significant habitats of indigenous fauna;
Frida Inta (S553)	S553.177	Rural Zones	GRUZ - PREC1 - P1	Amend	Assume this policy applies to Gloriavale; however communes could spring up elsewhere.	Prec 1; P1; 4 Be undertaken in a planned manner, in accordance with a concept plan agreed with the Grey District Council. relevant district council
Frida Inta (S553)	S553.178	General Rural Zone	GRUZ - R3	Amend	Here is another instance of 'site' being used - is it referring to per title or per something else?	Subsequent amendment of site
Frida Inta (S553)	S553.179	General Rural Zone	Rural Zones	Amend	Grammer	3 For areas disturbed, topsoil shall be stripped and stockpiled and then replaced over the area of land disturbed

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Frida Inta (S553)	S553.180	General Rural Zone	GRUZ - R12	Amend	The Buller District Plan restrictions must move over into this Plan.	Add: 6. Activities are limited to 150mm diameter drillhole per ha and 50 linear meters per ha for sampling with explosives. Then the site must be restored to original condition. Otherwise its a controlled activity.
Frida Inta (S553)	S553.181	General Rural Zone	GRUZ - R12	Oppose	Mineral extraction should not be a permitted activity.	Amend all mining to discretionary activity
Frida Inta (S553)	S553.182	General Rural Zone	GRUZ - R18	Amend	Mineral extraction should always be discretionary as a bottom line.	change activity status to discretionary
Frida Inta (S553)	S553.183	Rural Lifestyle Zone	RLZ - R15	Amend	Mineral extraction should always be discretionary as a bottom line.	amend activity status to discretionary
Frida Inta (S553)	S553.184	General Rural Zone	GRUZ - R20	Amend	Concerns about animal and environment welfare in relation to factory farming.	k. number and type of livestock
Frida Inta (S553)	S553.185	Settlement Zone	Overview	Support	There needs to be a cap on dairy and other intense rural production.	new provision limiting intensive rural production
Frida Inta (S553)	S553.186	Settlement Zone	SETZ - R1	Amend	Composting toilets and collection of rainwater for drinking should be accommodated.	2or alternatively serviced by composting toilets and independent collection of rainwater for drinking
Frida Inta (S553)	S553.187	Settlement Zone	SETZ - R2	Support	Site' is important here - is that per legal title or per whole land holding in one.	change activity status to discretionary or reword to be 2000m2 or 10% of site, whichever is the lesser.
Frida Inta (S553)	S553.188	How The Plan Works	Satutory Context	Amend	Consistent with Buller District Plan and RMA	Amend: General Duty to ComplyNo person may use any land in a manner which contravenes a rule in this Plan unless the activity is expressly allowed by a resource consent, or is an existing use allowed by Section 10 of the Act.Any activity which is not specifically referred to in the Plan or does not fall within the limits of permitted, controlled or discretionary activities is deemed to be a noncomplying activity and will require a

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						resource consent.
Frida Inta (S553)	S553.189	Buller Coalfield Zone	Buller Coalfield Zone	Oppose	This chapter is far too enabling of coal extraction.	Delete provisions
Frida Inta (S553)	S553.190	Buller Coalfield Zone	BCZ - R1	Oppose	There needs to be a spatial constraint for prospecting drillholes etc.	2. Where areas are to be disturbed, topsoil shall be stripped and stockpiled and then replaced over the area of land disturbedFor areas disturbed, topsoil shall be stripped and stockpiled and then replaced over the area of land disturbed as soon as possible and no later than 3 months after the disturbance has occurred; 5. All drilling limited to 150mm diameter and a density of one drill site per hectare.
Frida Inta (S553)	S553.191	Future Urban Zone	Future Urban Zone Policies	Amend	Although it is stated that general rules and regulations of GRUZ must be followed.	6. Avoid FUZ development in areas of indigenous biodiversity and natural character.
Frida Inta (S553)	S553.192	Future Urban Zone	FUZ - R9	Amend	Ridiculous to allow mineral prospecting in a FUZ.	delete
Frida Inta (S553)	S553.193	Mineral Extraction Zone	MINZ - P4	Support	include air pollution.	b. air pollution d Managing impacts on natural character and significant indigenous vegetation and significant habitats of indigenous fauna;
Frida Inta (S553)	S553.194	Mineral Extraction Zone	MINZ - P5	Amend	adverse effects should use the adverse effects hierarchy be mitigated, remedied, offset or compensated to achieve no net loss and preferably a net gain in biodiversity values.	adverse effects should use the adverse effects hierarchy be mitigated, remedied, offset or compensated to achieve no net loss and preferably a net gain in biodiversity values.
Frida Inta (S553)	S553.195	Mineral Extraction Zone	MINZ - R1	Amend	There needs to be a restriction on the spatial extent of land disturbed.	5. Any prospecting activities as defined by the Crown Minerals Act 1991 and all reconnaissance exploration activities up to and including drilling, scout trenching and geophysical surveys, subject to:a. All drilling limited to

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						150mm diameter and a density of one drill site perhectare.b. Scout trenching or sampling by hand methods, or by mechanical means wherethere is existing access to the area to be trenched or sampled, or by the use of explosives where the aggregate length of the samples taken using explosives does not exceed 50 linear metres of sample per hectare.c. Geophysical surveys not using explosives.d. For prospecting activities, where areas are disturbed, topsoil shall be stockpiled and replaced over such areas, and the site shall be rehabilitated and restored generally to its original condition.6. Vegetation also needs to be stockpiled to be reinstated after the works finish.
Frida Inta (S553)	S553.196	Mineral Extraction Zone	Rules	Amend	Woefully inadequate to cover the issue of light pollution at mining sites.	Subsequent amendment from Light Chapter: a. Have a colour corrected temperature of no greater than 2200K 3000K (warm white);b. 10 Lux measured at the boundary, not inside the boundaryc. Light should not create effects on visual amenity, people and neighborhoods
Frida Inta (S553)	S553.197	Mineral Extraction Zone	MINZ - R3	Amend		5. There shall be no offensive or objectionable dust nuisance, odour or air pollution at or beyond the zone boundary
Frida Inta (S553)	S553.198	Māori Purpose Zone	Māori Purpose Zone Policies	Amend	Adjoining landowners, including the DOC estate, adverse effects of activities from a MPZ	Ensuring any significant adverse effects from these activities on adjoining landowners beyond the zone and the wider environment are avoided mitigated;

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Frida Inta (S553)	S553.199	Māori Purpose Zone	MPZ - P3	Amend	There is nothing in any of the MPZ rules protecting indigenous biodiversity.	e. Indigenous biodiversity is protected.
Frida Inta (S553)	S553.200	Stadium Zone	STADZ - P3	Amend		Require land use activities and development to be designed and operated to ensure that adverse effects of noise and light on the amenity of adjacent residential areas are minimised. Any lighting must have adequate hooding to ensure no upwards light spill.
Frida Inta (S553)	S553.201	Stadium Zone	STADZ - R1	Amend	Needs to include constraints on noise and light levels as in P3.	6. All effects of noise and light on the amenity of adjacent residential areas are minimised. Any lighting must have adequate hooding to ensure no upwards light spill.
Frida Inta (S553)	S553.202	DESIGNATIO NS	DESIGNATIONS	Amend	Designations around particular issues need to be grouped together.	Group designations by purpose
Frida Inta (S553)	S553.203	DESIGNATIO NS	DESIGNATIONS	Amend	Part 12 of the Buller District Plan is a list of its roading hierarchy needs to be incorporated.	Include a roading hierachy
Frida Inta (S553)	S553.204	SCHED1B - SCHEDULE OF ARCHEOLOGI CAL SITES	SCHED1B - SCHEDULE OF ARCHEOLOGICAL SITES	Amend	Some in the Mokihinui area have been omitted.	add Archeological sites at Mokihinui and L28/36 at the Chasm Creek Walkway
Frida Inta (S553)	S553.205	SCHED1A- SCHEDULE OF HISTORIC HERITAGE ITEMS AND AREAS	SCHED1A - SCHEDULE OF HISTORIC HERITAGE ITEMS AND AREAS	Amend	The Buller District Plan has a list of 250 historic buildings and sites.	amend plan to include all listings from BDP
Frida Inta (S553)	S553.206	SCHED7 - SCHEDULE OF HIGH COASTAL NATURAL CHARACTER	NCA55	Amend	Correct typo	Mokihinui Extensive saltwater lagoon enclosed by a vast exposed beach and dunefield and fed by the Mokihinui Orowaiti River.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Frida Inta (S553)	S553.207	Appendix Ten: New Zealand Archaeological Association Sites of Māori Origin	Appendix Ten: New Zealand Archaeological Association Sites of Māori Origin	Amend	Site location descriptions included, whether it be street or place name or lat/long co-ordinates.	Include location descriptions in table
Frida Inta (S553)	S553.208	Whole Plan	Whole plan	Amend	This Plan needs to address the issue of genetic engineering.	incorporate chapter on genetically modified organisms into the plan
Frida Inta (S553)	S553.209	Introduction	Introduction	Amend	Contents in pdf plan contains a typo	POU - Poutini Ngāi Tapu Tahu
Frida Inta (S553)	S553.210	Appendix Ten: New Zealand Archaeological Association Sites of Māori Origin	Appendix Ten: New Zealand Archaeological Association Sites of Māori Origin	Support	It is important that any known sites are recorded.	Record all known sites in Schedule 1 and Appendix 10
Frida Inta (S553)	S553.211	SCHED1B - SCHEDULE OF ARCHEOLOGI CAL SITES	ARCH1	Amend	A waka kereru was found in 1998/1999 in Pages Stream in Seddonville.	Add waka kereru at Pages Stream in Seddonville.
Frida Inta (S553)	S553.212	Interpretation	PARKS FACILITIES	Amend	Include the following in parks facilities	PARKS FACILITIES e- play spaces, j. cycle paths, k. gardens, landscaping and planting
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 15 years old to read 10 years old
Frida Inta (S553)	S553.215	Natural Features and Landscapes	Overview	Amend		specific mention of mature indigenous trees as

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						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 ecosystemservices are maintained or, hopefully, enhanced.
Frida Inta (S553)	S553.217	Natural Features and Landscapes	NFL - P2	Amend		Insert P2 as P1 to read: P1 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 hierarchy is followed. are remedied, mitigated or offset.
Frida Inta (S553)	S553.218	Natural Character and Margins of Waterbodies	NC - R1	Amend	There could be numerous riparian openings all providing bits of the same service.	f. f needs to be combined with (g).
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.	k. Whitebaiting where there is nodriveway to the stand, nor solid, perennial shelters and whitebaitingstructures.
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 I. riparian margins that arevested with LINZ as hydro.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
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	3. 20m2 per 200m length where the works is offset by riparian margin enhancement elsewhere.
Frida Inta (S553)	S553.224	Public Access	Public Access	Amend		There needs to be a policy including the purpose of esplanade strips
Frida Inta (S553)	S553.225	Temporary Activities	Temporary Activities	Amend		Restricted discretionary matters consider effects on wildlife
Frida Inta (S553)	S553.226	Planning Maps and Overlays	Open Space Zone	Amend	All the DOC estate should be classified as one zone, except for smaller recreational sites.	Amend to entire DOC estate to one zone
Frida Inta (S553)	S553.227	Open Space and Recreation Zones	Open Space and Recreation Zones	Amend	It should be DOC making the rules here rather than the district council.	The whole section OSRZ needs to be re- written with the object of understanding that a district council Plan is lower in hierarchy than a DOC statute with respect to natural values within the conservation estate.
Frida Inta (S553)	S553.228	Residential Zones	RESZ - P2	Amend		Amend 2 b. Minimise nuisance from noise, air pollution, light spill and vibration;
Frida Inta (S553)	S553.229	Residential Zones	RESZ - P4	Amend		Amend: Enable existing non-residential activities and home occupationsto continue and new non - residential activities to establish provided theyavoid do not have a significant adverse effect on thecharacterparticularly in relation to scale, car parking, vehiclemovements, noise, air pollution, visualappearance, vibration, glare, dust and odour.
Frida Inta (S553)	S553.230	Residential Zones	RESZ - P5	Amend		Amend: Industrial Activities, and non- residential activities which involve noxious, offensive and dangerous activities and those with a significant negative impact on amenity shall not be located in RESZ - Residential Zones, and will require a

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						buffer zone.
Frida Inta (S553)	S553.231	Residential Zones	Residential Zone Policies	Amend		Add: A 20 metre buffer zone around the periphery of residential zones should separate residential from non-residential activities.
Frida Inta (S553)	S553.232	Whole Plan	Whole plan	Amend		All residential (including settlement)zones should have air pollution rule added in.
Frida Inta (S553)	S553.233	General Residential Zone	GRZ - R5	Amend	Vehicle movement should be subject to neighbours and or community approval.	6. No external generation ofdust, odour, exsmoke or other air pollution occurs as part of the activity.
Frida Inta (S553)	S553.234	DESIGNATIO NS	DESIGNATIONS	Support		Amend designation listing and schedules to run north to south
Fuel Companies (S613)	S613.001	Whole Plan	Whole plan	Amend	The Fuel Companies' core business relates to retail fuel outlets, including service stations and truck stops, and supply to commercial facilities.	In addition to the specific outcomes and relief sought, the following general relief is sought: a) Achieve the following: i. The purpose and principles of the Resource Management Act 1991 (RMA) and consistency with the relevant provisions in Sections 6 - 8 RMA; ii. Give effect to the West Coast Regional Policy Statement; iii. Assist the Council to carry out its functions under Section 31 RMA; iv. Meet the requirements of the statutory tests in section 32 RMA; and v. Avoid, remedy or mitigate any relevant and identified environmental effects; b) Make any alternative or consequential relief as required to give effect to this submission, including any consequential relief required in any other sections of the proposed plan that are not specifically subject of this submission but where consequential changes are required to

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						ensure a consistent approach is taken throughout the document; and c) Any other relief required to give effect to the issues raised in this submission.
Fuel Companies (S613)	S613.002	Hazardous Substances	HS - 01	Amend	Consider that Objective HS-01 and Policy HS-P1 should specifically refer to hazardous facilities, rather than to hazardous substances.	Amend Objective HS-O1 as follows: The benefits associated with the use of hazardous substances are recognised while ensuring that risks to the environment and human health arising from subdivision use and development activities involving hazardous substances at major hazard facilities are minimised.
Fuel Companies (S613)	S613.003	Interpretation	Definitions	Amend	To avoid confusion, request a definition of major hazard facilities is provided, with reference to the HSWA definition.	Introduce a definition of Major Hazard Facility as follows:Major Hazard Facility: has the same meaning as in regulation 4 of the Health and Safety at Work Act 2015.
Fuel Companies (S613)	S613.004	Hazardous Substances	HS - P1	Amend	Consider that these provisions need to be reworked to ensure that they are consistent with the Hazardous Substances and Contaminated Land Section 32 report	Amend Policy HS - P1 as follows: Activities and facilities involving the use and storage of hazardous substances at major hazard facilities shall be designed, located, constructed and operated so as to minimise manage residual risk to people and the environment.
Fuel Companies (S613)	S613.005	Hazardous Substances	Hazardous Substances Policies	Support	Address matters in relation to major hazardous facilities, proximity to overlay areas and natural hazards, providing for major hazard facilities	Retain Policies HS-P2, HS-P3, HS-P4 as notified
Fuel Companies (S613)	S613.006	Hazardous Substances	Hazardous Substances Policies	Amend	Recognise the role that other legislation plays in controlling hazardous substances	Introduce a new policy (Policy HS-P5) as follows: Avoid any unnecessary duplication of regulation between the Hazardous Substances and New

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						Organisms Act 1996, the Health and Safety at Work Act 2015 and relevant regulations, and the Plan.
Fuel Companies (S613)	S613.007	Contaminated Land	CL - O1	Amend	Changes are sought to focus solely on human health effects,	Amend Objective CL-O1 as follows: To ensure that eContaminated land is used, subdivided, developed or managed in a way that avoids or mitigates manages adverse effects on the environment and human health to an acceptable level.
Fuel Companies (S613)	S613.008	Contaminated Land	CL - P2	Amend	Changes are sought to the relevant objectives and policies to focus solely on human health effects	Amend Policy CL-P2 as follows: Ensure that when contaminated land is used, subdivided and/or developed, the land is managed or remediated in a way that avoids or mitigates adverse effects on the environment and manages the risk to human health to a level that is appropriate for the intended use.
Fuel Companies (S613)	S613.009	Earthworks	Earthworks	Support	Fuel Companies are supportive of a policy framework based on management or risk to human health to ensure contaminated land is appropriate for its intended use.	Retain Objective EW-O1 and Policies EW-P1, EW-P2, EW-P3, EW-P4 as notified.
Fuel Companies (S613)	S613.010	Earthworks	EW - R1	Amend	Would like the maintenance and replacement and removal of underground petroleum storage tanks exempt	Amend Rule EW-R1 as follows: All Permitted activities must comply with the following relevant standards. 1. Earthworks must not exceed a maximum depth or height above ground level of 1.5m measured vertically within 1.5m of a boundary except where these are for the maintenance, removal or replacement of an underground petroleum storage tank or are undertaken

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						by a network utility operator for the purpose of: a. Pole foundations; b. Backfilled trenches; or c. Installation of services by trenchless methods such as directional drilling; 2. All imported fill must consist of cleanfill material; 3. Erosion and sediment control measures mustbe put in place designed, installed and maintained for the duration of earthworks to avoid minimise sediment run-off from earthworks activities entering a Council reticulated network or into waterbodies.
Fuel Companies (S613)	S613.011	Earthworks	EW - R2	Amend	The Fuel Companies would like to see the maintenance and replacement and removal of underground petroleum storage tanks exempt from these earthworks requirements	j. These are earthworks associated with the removal, upgrade or replacement of an underground petroleum storage tank.
Fuel Companies (S613)	S613.012	Transport	Transport Policies	Support	The Fuel Companies support seeking resilience to the effects of climate change and supports reduction in greenhouse gas emissions	Retain Policy TRN-P6 and Policy TRN-P8 as notified.
Fuel Companies (S613)	S613.013	Transport	TRN - R6	Amend	Consider that it is important to have a clear permitted activity pathway to support this policy framework which doesn't differentiate where such facilities should be located.	Amend Rule TRN-R6 as follows: Establishment of e-bike and e-vehicle charging stations in all zones and the transport corridor Activity Status Permitted Where: 1. All performance standards in Rule TRN - R1 are complied with.; and2. These are not more than 2m in height and 10m in area. Advice Note: If within the legal road reserve, contact the appropriate land transport authority to obtain a license to occupy.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Fuel Companies (S613)	S613.014	Transport	TRN - R11	Amend	Consider that it is important to have a clear permitted activity pathway to support this policy framework which doesn't differentiate where such facilities should be located.	Establishing e-bike and e-vehicle charging stations in the transport corridor not meeting Permitted Activity standards Activity Status Restricted Discretionary Discretion is restricted to: a. Effects on the transport network; and b. Outcome of consultation with the relevant transport agency. c. Effects on amenity values.
Fuel Companies (S613)	S613.015	Hazardous Substances	HS - P1	Support	Consider 'minimise' to be problematic, and inconsistent with the advice provided in the Section 32 report	Amend Policy HS - P1 as follows: Activities and facilities involving the use and storage of hazardous substances at major hazard facilities shall be designed, located, constructed and operated so as to minimise manage residual risk to people and the environment.
Fuel Companies (S613)	S613.016	Hazardous Substances	HS - P1	Support	consider the word minimise to be problematic, and inconsistent with the advice provided in the Section 32 report, para 9.	Amend Policy HS - P1 as follows: Activities and facilities involving the use and storage of hazardous substances at major hazard facilities shall be designed, located, constructed and operated so as to minimise manage residual risk to people and the environment.