



Te Tai o Poutini PLAN

A combined district plan for the West Coast

Summary of Submissions

Submitter Names: M-P

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 requests. Summaries of all decisions requested and details on how to make a further submission are available at www.ttpn.nz

Submitter	Submission Point	Provision	Position	Reasons	Decision Requested
Macty Francis Vithayathil (S246)	S246.002	Sites and Ares of Significance to Māori	Oppose	We wish to advise that we oppose the establishment of SASM 68 -Paroa Lagoon in its current format. The mapping is incorrect and amendments are supported by Poutini Ngāi Tahu.	That the eastern boundary of the designated SASM68 be amended and realigned to the Paroa Lagoon waterway eastern edge. New large scale maps accurately showing this new boundary delineation be produced and supplied to all affected parties for approval.
Macty Francis Vithayathil (S246)	S246.003	Sites and Areas of Significance to Māori Rules	Amend	Tthe RMA states that because SASM are considered a type of historic heritage, rules associated with them have legal effect from the time the proposed TTPP was notified.This is totally rejected by the affected	That any of the proposed references, rules, or conditions, placed on any private property fronting the state highway be withdrawn immediately. Any Rules with immediate effect be withdrawn from the currently effected private properties.

				private landowners, who are submitting and requesting that these rules be withdrawn from the private properties identified.	
Madelene Gibson (S215)	S215.001	SASM 44	Amend	Concern that rules aren't clear in the plan	Would like more information on how the SASM will affect the property in the future
Madelene Gibson (S215)	S215.002	Sites and Areas of Significance to Māori Rules	Amend	Concern that rules aren't clear in the plan	Clarify rules that apply to SASM 44
Manawa Energy Limited (Manawa Energy) (S438)	S438.001	Definitions	Oppose	Manawa considers that the word 'minimise' is subjective, open to interpretation and ambiguous. This terminology is not used by relevant statutory documentation such as the Resource Management Act 1991 or the NPS – REG, and does not have a basis in caselaw. Manawa Energy seeks that this is replaced throughout the Plan by terminology appropriate to the context it has been used.	Replace the word 'minimise' with appropriate wording such as 'avoid, remedy or mitigate' throughout the Plan as outlined below.
Manawa Energy Limited (Manawa Energy) (S438)	S438.00144	ENG - P1	Amend	Manawa supports the intent of this policy, however, considers that it that this policy:• mixes support for activities with management of effects • mixes transmission,	<Enable the development, operation, maintenance and upgrading of existing and new electricity transmission, distribution and renewable electricity generation activities , while recognising the positive social, economic, cultural and

Energy) (S438)				distribution and generation without differentiating between various types of 'energy' activities• does not include a reference to renewable electricity generation activities specifically.	environmental benefits of renewable electricity generation and transmission.
Manawa Energy Limited (Manawa Energy) (S438)	S438.002	Definitions	Oppose	Manawa acknowledges that there are commonly different provisions applied to renewable electricity generation of different scales. Often this enables smaller scale activities to be developed more easily than larger scale projects. Generally, the reason for this is to recognise that the larger the scale of the activity, the more likely it will generate adverse effects. This approach is reflected in the NPS-REG which specifically references "Small and community-scale distributed electricity generation". However, the pTTPP has developed separate definitions of 'small-scale', 'community-scale' and 'large-scale' activities and divided rules according to these arbitrary definitions. Manawa acknowledges that the scale of activity may be useful to use	Replace the use of the terms 'small-scale', 'community-scale' and 'large-scale' with the terminology utilised in the NPS – REG. This is specifically addressed through submissions on definitions (as outlined below), however should be considered in the context of the Plan provisions as a whole.

				<p>in rules that allow for distinction between activities but is opposed to the definitions currently applied as they have no basis in higher order documents. Also the use of ‘large-scale’ for what may actually be very modest development is misleading and inappropriate. Manawa seeks that the terminology utilised is clear, well defined and not emotive / subjective. It considers that the terminology used should be consistent with that used in that used in the NPS – REG.</p>	
<p>Manawa Energy Limited (Manawa Energy) (S438)</p>	S438.003	CRITICAL INFRASTRUCTURE	Oppose in part	<p>The pTTPP contains a number of varying definitions applicable to renewable electricity generation activities – these include just referring to ‘infrastructure’, and referring to ‘critical infrastructure’. There are also references in the plan to ‘transmission infrastructure’, ‘electricity infrastructure’, ‘utilities and infrastructure’, ‘specified infrastructure’, and ‘green infrastructure’. The use of such varying terminology is confusing and unnecessary. To ensure the West</p>	<p>Delete the term ‘critical infrastructure’ and replace with ‘regionally significant infrastructure’ based on the West Coast Regional Policy Statement, as requested in the later submission point. All necessary and consequential amendments to other parts of the Plan are also sought to support this change.</p>

				Coast Regional Policy Statement (RPS) is given effect to, it is sought that the term 'critical infrastructure' is replaced with the term 'regionally significant infrastructure'. This ensures consistency but also aligns the district plan with commonly used definitions as are now being applied in national direction. It is noted that the two definitions differ slightly, but the RPS definition is operative and therefore preferred. If necessary, the definition from the RPS could also be updated to include any aspects of the 'critical infrastructure' definition that are also necessary.	
Manawa Energy Limited (Manawa Energy) (S438)	S438.004	Step 2 - Locate the relevant zone rules	Support	Manawa supports the second paragraph of Step 2 which clearly outlines the manner in which the Infrastructure, Energy, Transport, Subdivision and Temporary Activities Chapters operate in relation to the remainder of the Plan. It considers that this provides clarity to all Plan users and thereby assists in the efficient administration of the Plan.	Retain the second paragraph in Step 2 'locate the relevant zone rules' as notified.
Manawa Energy	S438.005	ARTIFICIAL LAKE OR POND	Support	Manawa supports the inclusion of this definition as notified, and the	Retain the definition of 'artificial lake or pond' as notified.

<p>Limited (Manawa Energy) (S438)</p>				<p>specific acknowledgement that this term includes man made reservoirs. It considers that this provides clarity to all Plan users and thereby assists in the efficient administration of the Plan.</p>	
<p>Manawa Energy Limited (Manawa Energy) (S438)</p>	<p>S438.006</p>	<p>COMMUNITY SCALE</p>	<p>Oppose</p>	<p>As discussed above, Manawa opposes the definition of ‘community scale’, in relation to renewable energy activities as it creates a differentiation between various scales of Renewable Electricity Generation activities based on an arbitrary generation limit, and introduces a subjective element to the definition of such facilities. If this type of definition is considered to be necessary Manawa requests that the definition adopted is consistent with that included in the National Policy Statement – Renewable Electricity Generation (2011). This definition combines ‘community scale’ with ‘small scale’ renewable electricity generation and removes any capacity limit. If a scale of activity is considered necessary, this can be included through any</p>	<p>Delete the definition of ‘community scale’ and replace it with the following definition of ‘small and community- scale distributed electricity generation’: small and community- scale distributed electricity generation: means renewable electricity generation for the purpose of using electricity on a particular site, or supplying an immediate community, or connecting into the distribution network.</p>

				specific rules that limit the nature or scale of the activity under different rules.	
Manawa Energy Limited (Manawa Energy) (S438)	S438.007	CRITICAL INFRASTRUCTURE	Oppose	As discussed above, Manawa supports the recognition of electricity transmission and distribution assets, however, seeks that this is extended to include electricity generation activities in accordance with the NPS – REG and to ensure consistency with the RPS. It is considered that this electricity generation is necessary to maintain the resilience and function of West Coast communities, and without this there will be a significant impact on the ability of many businesses and key community facilities to operate. Further, the pTTPP contains a number of varying definitions applicable to Renewable Electricity Generation activities. To ensure consistency with the RPS and to avoid variations in applicability of it is sought that the term ‘critical infrastructure’ is replaced with the term ‘regionally significant infrastructure’.	Amend the definition of ‘Critical Response facilities’ as follows: means, in relation to natural hazards, hospitals, fire, rescue, police stations, buildings intended to be used in an emergency for shelter, communication operations or response, hazardous or explosive material storage, aviation control towers, air traffic control centre, emergency aircraft hangers, fuel storage, major dams, electricity generation, transmission and distribution assets ; community scale potable water treatment facilities; and wastewater treatment facilities.

Manawa Energy Limited (Manawa Energy) (S438)	S438.008	CRITICAL RESPONSE FACILITIES	Support in part	<p>Manawa supports the recognition of some hydro electricity generating related infrastructure with the definition, however, considers that limitation of this to ‘major dams’ is not appropriate. The term ‘major dams’ is ambiguous and is unclear on what it applies to. All renewable electricity generation activities are of critical importance to the West Coast to ensure resilience in a natural hazard event. Manawa seeks a wider recognition within this definition using terminology that is consistent with other definitions.</p>	<p>Amend the definition of ‘Critical Response facilities’ as follows: means, in relation to natural hazards, hospitals, fire, rescue, police stations, buildings intended to be used in an emergency for shelter, communication operations or response, hazardous or explosive material storage, aviation control towers, air traffic control centre, emergency aircraft hangers, fuel storage, major dams, electricity generation, transmission and distribution assets; community scale potable water treatment facilities; and wastewater treatment facilities.</p>
Manawa Energy Limited (Manawa Energy) (S438)	S438.009	ENERGY ACTIVITY	Support	<p>Manawa supports the definition of ‘energy activity’ and recognition of the wide range of Renewable Electricity Generation activities/ assets within this.</p>	<p>Retain the definition of ‘energy activity’ as notified.</p>
Manawa Energy Limited (Manawa Energy) (S438)	S438.010	FUNCTIONAL NEED	Support	<p>Manawa supports the definition of ‘functional need’ and that this is a term defined by the National Planning Standards.</p>	<p>Retain the definition of ‘functional need’ as notified.</p>

Manawa Energy Limited (Manawa Energy) (S438)	S438.011	LAKE	Support	Manawa supports the definition of 'lake' and clarification that this term does not include an artificial waterbody or reservoir.	Retain the definition of 'Lake' as notified.
Manawa Energy Limited (Manawa Energy) (S438)	S438.012	LARGE SCALE	Oppose	As discussed above, Manawa opposes the definition of 'large scale', in relation to energy as it creates a differentiation between various scales of Renewable Electricity Generation activities based on an arbitrary generation limit, and introduces a subjective element to the definition of such facilities. Further the use of 'large-scale' for what may actually be very modest development is misleading and inappropriate. If this type of definition is considered to be necessary Manawa requests that the definition adopted is consistent with that included in the National Policy Statement – Renewable Electricity Generation (2011). The NPS – REG does not include a definition of the term 'large scale' – but defines the terms 'small and community – scale	Delete the definition of 'Large Scale'.

				distributed electricity generation’ and ‘renewable electricity generation activities’. Manawa requests that these definitions are included in the pTTPP, and that the existing definition of the term ‘large scale’ is deleted.	
Manawa Energy Limited (Manawa Energy) (S438)	S438.013	MAINTENANCE	Support	Manawa supports the definition of the term ‘maintenance’ and its clear applicability to renewable electricity generation activities. However, to be explicit about what is intended to be encompassed by this definition, and to ensure that normal activity is provided for, this definition should also refer to ‘repair’.	Retain the definition of ‘maintenance’ as notified. Amend the definition to be ‘maintenance’
Manawa Energy Limited (Manawa Energy) (S438)	S438.014	OPERATIONAL NEED	Support	Manawa supports the definition of ‘operational need’ and that this is a term defined by the National Planning Standards.	Retain the definition of ‘operational need’ as notified.
Manawa Energy Limited (Manawa Energy) (S438)	S438.015	RENEWABLE ELECTRICITY GENERATION	Support	Manawa supports the definition of the term ‘renewable electricity generation’. This definition is consistent with the definition contained in the NPS – REG, will ensure consistency with other relief	Retain the definition of ‘renewable electricity generation’ as notified.

				sought, and will provide certainty to Plan users.	
Manawa Energy Limited (Manawa Energy) (S438)	S438.016	RENEWABLE ELECTRICITY GENERATION ACTIVITIES	Support in part	Manawa supports the definition of the term ‘renewable electricity generation activities’ as this is consistent with the definition included in the NPS – REG. Manawa seeks that this definition is expanded to apply to ancillary earthworks and vegetation clearance as these are fundamental elements of installing, maintaining and operating such activities.	Amend the definition of ‘renewable electricity generation activities’ as follows: ‘means the construction, operation, maintenance and upgrading of structures associated with renewable electricity generation. This includes small and community-scale distributed renewable electricity generation activities and the system of electricity conveyance required to convey electricity to the distribution network and/or the national grid and electricity storage technologies associated with renewable electricity. It includes all ancillary components and activities such as substations, climate/environmental monitoring equipment, earthworks, vegetation clearance , roading, maintenance buildings, temporary concrete batching plants, internal transmission and fibre networks, and site rehabilitation works’.
Manawa Energy Limited (Manawa Energy) (S438)	S438.017	RIPARIAN MARGIN	Support in part	Manawa support the inclusion of a definition of the term ‘riparian margin’, however considers that the margins included within the definition are excessive for lakes. Further it does not consider that these setbacks have been, or are justified to ensure protection.	Amend the definition of ‘riparian margin’ as follows: means all land within 10m of any waterbody . a. 10m of any wetland; b. 20m of any lake; and c. 10m of any stream or river with an average bed width greater than 3m

Manawa Energy Limited (Manawa Energy) (S438)	S438.018	SMALL SCALE	Oppose	<p>As discussed above, Manawa opposes the definition of ‘small scale’, in relation to energy as it creates a differentiation between various scales of Renewable Electricity Generation activities based on an arbitrary generation limit, and introduces a subjective element to the definition of such facilities. If this type of definition is considered to be necessary Manawa requests that the definition adopted is consistent with that included in the National Policy Statement – Renewable Energy Generation (2011). This definition combines ‘community scale’ with ‘small scale’ renewable electricity generation and removes any capacity limit.</p>	<p>Delete the definition of ‘small scale’ and replace with the following definition of ‘small and community- scale distributed electricity generation’: small and community- scale distributed electricity generation: means renewable electricity generation for the purpose of using electricity on a particular site, or supplying an immediate community, or connecting into the distribution network.</p>
Manawa Energy Limited (Manawa Energy) (S438)	S438.019	UPGRADING	Support	<p>Manawa supports the inclusion of the definition of ‘upgrading’, and the specific reference to renewable electricity generation activities in this definition.</p>	<p>Retain the definition of ‘upgrading’ as notified. Amend the term used to be ‘upgrading / upgrade’ to ensure clarity in use throughout the plan.</p>
Manawa Energy Limited	S438.020	Ecosystems and Indigenous Biodiversity	Not Stated	<p>The terms ‘indigenous biodiversity/ biodiversity’ are used throughout the pTTPP, however a definition of</p>	<p>Add a new definition of the term ‘indigenous biodiversity / biodiversity’ as follows: indigenous biodiversity / biodiversity:</p>

(Manawa Energy) (S438)				this term is not included. Manawa considers that the inclusion of a definition will provide certainty for Plan users, and will assist in the effective administration of the Plan. It is appropriate to use the definition from the NPS-IB for consistency.	means the living organisms that occur naturally in New Zealand, and the ecological complexes of which they are part, including all forms of indigenous flora, fauna, and fungi, and their habitats.
Manawa Energy Limited (Manawa Energy) (S438)	S438.021	Definitions	Not Stated	Manawa considers it appropriate that the term ‘major hazard facility’ is defined within the Plan. This term is used a number of times in Part 2 – District Wide Matters/HAZ – Hazards and Risks/ HS – Hazardous Substances.	Add a new definition of the term ‘major hazard facility’ as follows: major hazard facility: Has the same meaning as the Health and Safety at Work (Major Hazard Facilities) Regulations 2016. means a facility that WorkSafe has designated as a lower tier major hazard facility or an upper tier major hazard facility under regulation 19 or 20.
Manawa Energy Limited (Manawa Energy) (S438)	S438.022	Definitions	Not Stated	Manawa considers it appropriate that the term ‘minor upgrade’ is included within the Plan. This term is included in ENG – R4, INF – R26, NC – R1, CE – R5 and CE – R10. It considers that the inclusion of such a definition will benefit in the efficient and consistent administration of the Plan and will provide certainty to Plan users. The inclusion of such a term is common in district plans and recognises that some activities go beyond maintenance and repair but	Add a new definition of the term ‘minor upgrade’ as follows: minor upgrade: Development to bring existing structures or facilities up to current standards or to improve the functional characteristics of structures or facilities, provided the upgrading itself does not give rise to any significant adverse effects on the environment and provided that the effects of the activity are the same or similar in character, intensity and scale as the existing structure and activity. In relation to renewable electricity generation activities, includes increasing the generation or transmission capacity, efficiency or

				are not of any significant scale. Inclusion of such a definition would enable greater recognition of the need for enhancement of renewable electricity generation.	security of regionally significant infrastructure and replacing support structures within the footprint of authorised activities.
Manawa Energy Limited (Manawa Energy) (S438)	S438.023	Definitions	Not Stated	In order to support other submission points, and to explain the use of the term 'non-renewable electricity generation activities' which is used within the plan, it is necessary to define this term. Manawa seeks that this be included in the definitions.	Add a new definition of the term 'non-renewable electricity generation activities' as follows: non-renewable electricity generation activities: means the construction, operation and maintenance of structures associated with electricity generation from non-renewable energy sources.
Manawa Energy Limited (Manawa Energy) (S438)	S438.024	Definitions	Not Stated	The pTTPP contains a number of varying definitions applicable to Renewable Electricity Generation activities. To ensure consistency with the RPS and to avoid variations in Manawa seeks that the term 'regionally significant infrastructure' is included within the Plan.	Add a new definition of the term 'regionally significant infrastructure' based on the West Coast Regional Policy Statement as follows: Regionally significant infrastructure means: a) The National Grid (as defined by the Electricity Industry Act 2010); b) Other electricity distribution and transmission networks defined as the system of transmission lines, sub transmission and distribution feeders and all associated substations and other works to convey electricity; c) Facilities for the generation of more than 1 MW of electricity and its supporting infrastructure where the electricity generated is supplied to the electricity distribution and transmission networks; d) Pipelines and gas facilities used for the transmission and

					<p>distribution of natural and manufactured gas;</p> <p>e) The State Highway network, and road networks classified in the One Network Road Classification Sub-category as strategic, and all special purpose road zones;</p> <p>f) The regional rail networks</p> <p>g) The Westport, Greymouth, and Hokitika airports;</p> <p>h) The Regional Council seawalls, stopbanks and erosion protection works;</p> <p>i) Telecommunications and radio communications facilities and networks;</p> <p>j) Public or community sewage treatment plants and associated reticulation and disposal systems;</p> <p>k) Public water supply intakes, treatment plants and distribution systems;</p> <p>l) Public or community drainage systems, including stormwater systems;</p> <p>m) The ports of Westport, Greymouth and Jackson Bay; and</p> <p>n) Public or community solid waste storage and disposal facilities, and o) Defence facilities.</p> <p>All necessary and consequential amendments to other parts of the Plan are also sought.</p>
Manawa Energy Limited (Manawa	S438.025	CR - O2	Support in part	Manawa supports Objective 2, in particular the recognition and protection of critical infrastructure throughout the Region. Manawa has sought that the term 'critical	<p>Retain CR – O2 as notified with the exception of the replacement of the term 'critical infrastructure' with the term 'regionally significant infrastructure' as follows:</p> <p>To enable and protect the continued function and</p>

Energy) (S438)				infrastructure’ is replaced with the term ‘regionally significant infrastructure’ and therefore requests the wording of the policy is amended to reflect this.	resilience of critical regionally significant infrastructure and connections and facilitate their quick recovery from adverse events.
Manawa Energy Limited (Manawa Energy) (S438)	S438.026	CR - O3	Support in part	Manawa appreciate the recognition of the role of critical / regionally significant infrastructure within the Region, but consider that recognition of the functional and operational need to locate in particular locations needs to be explicitly provided and further that Council support (rather than ensure) that this occurs. In a number of cases it may be impractical for this infrastructure to be sited away from natural hazards, and Manawa consider that the focus would be better placed on avoiding, remedying or mitigating the adverse effects of natural hazards on this infrastructure. Further it opposes the use of the term ‘hazardscape’ as this is not defined in the Plan, is not commonly used or understood in district plans, and is open to interpretation. Manawa has sought that the term ‘critical infrastructure’	Amend CR – O3 as follows: To support the location of critical regionally significant infrastructure and associated connections where the adverse effects of natural hazards on this infrastructure are able to be avoided, remedied or mitigated, whilst recognising the functional and operational needs of such infrastructure.

				is replaced with the term 'regionally significant infrastructure' and therefore requests the wording of the policy is amended to reflect this.	
Manawa Energy Limited (Manawa Energy) (S438)	S438.027	CR - O4	Support	Manawa supports this objective. Manawa's assets generate electricity which can be distributed along the West Coast without having to rely on the Coleridge line, thereby supporting resilience along the West Coast.	Retain CR – O4 as notified.
Manawa Energy Limited (Manawa Energy) (S438)	S438.028	NENV- O1	Support in part	Manawa supports the intent of this policy, however seeks that the wording used is consistent with that used in the Resource Management Act 1991.	Amend NENV – O1 as follows: To recognise and protect the outstanding natural character, landscapes and features, significant ecosystems and indigenous biodiversity that contribute to the West Coast's character and identify and Poutini Ngāi Tahu's cultural and spiritual values
Manawa Energy Limited (Manawa Energy) (S438)	S438.029	NENV - O3	Support	Manawa supports the explicit recognition that there is a need sometimes for regionally significant infrastructure to be located in significant natural areas.	Retain NENV – O3 as notified.
Manawa Energy Limited	S438.030	UFD - O1	Support	Manawa supports the explicit protection of critical infrastructure in Clause 8, however requests that the	Retain UFD – O1 (8), but replace the words 'critical infrastructure' with 'regionally significant infrastructure' as follows:

(Manawa Energy) (S438)				term 'critical infrastructure' is replaced with the term 'regionally significant infrastructure'.	Promote the safe, efficient and effective provision and use of infrastructure, including the optimisation of the use of existing infrastructure and protection of regionally significant infrastructure..
Manawa Energy Limited (Manawa Energy) (S438)	S438.031	[General]	Support	Manawa strongly support the separation of the ENG and INF chapters of the Plan. It considers that this provides a necessary degree of transparency for Plan users, and avoids duplication and confusion between the ENG and INF chapters. In addition to the specific matters raised below and relief sought, a 'clean' version the ENG chapter including the relief sought by Manawa is provided as Appendix B to this document.	Retain the separation between the ENG and INF chapters as notified.
Manawa Energy Limited (Manawa Energy) (S438)	S438.032	Overview	Support in part	Manawa strongly supports the separation of the ENG and INF chapters of the Plan. It considers that this provides a necessary degree of transparency for Plan users, and avoids duplication and confusion between the ENG and INF chapters.	Retain the statement at the end of the Overview section that clearly outlines the relationship between the ENG and INF chapters, as notified. If possible, Manawa requests that this statement differentiated from the remainder of the overview text (by use of font, bolding etc) to make this key information clearer.
Manawa Energy Limited (Manawa	S438.033	Overview	Support in part	The energy chapter covers generation, transmission and distribution of electricity. It inherently covers both renewables	Amend all objectives and policies by removing the reference to 'energy activities' and replacing this with a reference to 'renewable electricity generation activities'.

<p>Energy) (S438)</p>			<p>and non-renewables, however there is no provision for non-renewable energy nor any deterrent to non-renewable energy activities being established. The development of and continue use of non-renewable energy is not supported by international commitments and national direction and this needs to be made clear in the chapter. It is considered inappropriate that non-renewable energy activities, by virtue of inclusion within the definition of 'energy activities', are considered in the same manner as renewable electricity generation activities given the NPS that applies solely to these activities (NPS – RG 2011). Manawa requests that the wording is amended throughout the Plan to refer to Renewable Electricity Generation (as opposed to energy activities) in all supporting policies. Further it requests that a policy be added to avoid the development of non-renewable energy generation activities on the West Coast, and facilitate the replacement of non-</p>	<p>Add a new policy as follows: ENG – P10 Avoid the development of non-renewable electricity generation activities on the West Coast and facilitate the replacement of non-renewable energy sources, including the use of fossil fuels, in electricity generation.</p>
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				renewable energy sources, including the use of fossil fuels, in energy generation.	
Manawa Energy Limited (Manawa Energy) (S438)	S438.034	Overview	Support in part	The first sentence of the Overview incorrectly refers to all energy activities being recognised as regionally significant infrastructure in the West Coast Regional Policy Statement. Manawa requests that this section is amended to correct this error.	Delete the words ‘Energy activities including’ from the first sentence of the Overview section as follows: Renewable electricity generation, transmission, distribution and operation are recognised as regionally significant infrastructure in the West Coast Regional Policy Statement.
Manawa Energy Limited (Manawa Energy) (S438)	S438.035	Energy	Support in part	The Overview section of the Plan incorrectly refers to the title of the NPS on Renewable Energy Generation. This National Policy Statement applies to Renewable Electricity Generation.	Replace the word ‘Energy’ in the reference to the NPS with the word ‘Electricity’ in the second paragraph of the Overview section to read as follows: ... with renewable electricity recognised in the National Policy Statement on Renewable Electricity Generation.
Manawa Energy Limited (Manawa Energy) (S438)	S438.036	ENG - O1	Support in part	Manawa supports this provision, however requests that changes are made to terminology used in the objective to ensure that there is consistency between amendments sought to other parts of the Plan. Manawa considers it essential that Renewable Electricity Generation activities are provided for within the pTTPP to give effect to the provisions of the NPS – REG.	Amend ENG – O1 as follows: To recognise the local and regional benefits of electricity transmission, distribution and renewable electricity generation activities, by providing for their development, operation, maintenance and upgrading to meet the needs of Te Tai o Poutini/the West Coast.

<p>Manawa Energy Limited (Manawa Energy) (S438)</p>	<p>S438.037</p>	<p>ENG - O2</p>	<p>Support in part</p>	<p>Manawa considers that the use of the term ‘minimise’ is not consistent with terminology used in current Resource Management Act legislation, and therefore it is unclear what the level of outcome anticipated by this term involves. Manawa requests that the term ‘minimise’ should be replaced with the with ‘avoid, remedy or mitigate’ terminology provided by the Act as in different circumstances different aspects of the effects management hierarchy may be appropriate. Manawa also requests that the wording of policy be restructured to provide greater clarity and direction to Plan users, and that reference to functional and operational needs be retained to ensure consistency in terminology used in other national policy documents.</p>	<p>Amend ENG – O2 as follows: To recognise the functional and operational needs associated with the location and design of renewable electricity generation activities, and to avoid, remedy or mitigate any adverse effects of these activities on communities and the environment.</p>
<p>Manawa Energy Limited (Manawa Energy) (S438)</p>	<p>S438.038</p>	<p>ENG - O3</p>	<p>Support in part</p>	<p>Manawa supports the recognition of the need to provide for renewable electricity generation and the recognition of the potential for reverse sensitivity effects on</p>	<p>Amend ENG – O3 as follows: To provide for the development, operation, maintenance and upgrade of energy renewable electricity generation activities and to protect them</p>

Energy) (S438)				renewable electricity generation activities (as is required to be addressed in the NPS – REG). It is however considered better to separate these two concepts for clarity. It is also suggested that terminology used is amended to ensure consistency with earlier comments and terminology used in the Resource Management Act 1991.	from the adverse effects of incompatible subdivision, use and development
Manawa Energy Limited (Manawa Energy) (S438)	S438.039	ENG - P2	Support in part	Manawa generally supports this policy, however requests that changes are made to provide clarity that the intent of the policy is to include new activities, as well as existing activities.	Amend ENG – P2 as follows: When considering proposals to develop and operate new and existing renewable electricity generation, electricity transmission and distribution activities, have particular regard to the benefits to be obtained from the proposal, including: a. Maintaining or increasing security of renewable electricity supply by diversifying the type and/or location of renewable electricity generation.....
Manawa Energy Limited (Manawa Energy) (S438)	S438.040	ENG - P3	Support in part	Manawa supports the intent of this policy, however, considers that it could be expressed in a manner more consistent with a similar policy included in the INF chapter (policy 3) and more closely aligned to the approach directed by the NPS-REG.	Amend ENG – P3 as follows: Avoid reverse sensitivity effects from incompatible subdivision, use and development on renewable electricity generation and electricity transmission and distribution activities.
Manawa Energy	S438.042	ENG - P4	Support in part	Manawa supports the intent of this policy, however, considers that it	Amend ENG – P4 as follows: Avoid, remedy or mitigate adverse effects on

Limited (Manawa Energy) (S438)				needs to be updated to clearly reference renewable electricity generation and to use established terminology that is well understood rather than 'minimise'.	communities and the environment from renewable electricity generation and electricity transmission and distribution activities by: <ul style="list-style-type: none"> • Having regard to ...
Manawa Energy Limited (Manawa Energy) (S438)	S438.043	ENG - P5	Support in part	Manawa requests that amendments are made to this policy to ensure consistency throughout the Plan in the use of defined terms and in referencing renewable electricity rather than energy generally.	a. Amend ENG – P5 as follows: When considering proposals to develop, operate, maintain and upgrade new and existing renewable electricity generation activities: Recognise their functional needs and operational needs ; and ...
Manawa Energy Limited (Manawa Energy) (S438)	S438.044	ENG - P6	Support	Manawa supports the intent of the policy, however requests that there is no distinction made between varying scales of renewable generation activities.	Amend ENG – P6 as follows: Provide for the development, upgrading, maintenance and operation of: a. A range of renewable electricity generation activities; and b. ...
Manawa Energy Limited (Manawa Energy) (S438)	S438.045	Energy Policies	Support	The energy chapter covers generation, transmission and distribution of electricity. It inherently covers both renewables and non-renewables, however there is no provision for non-renewable energy nor any deterrent to non-renewable electricity activities being established. Non-renewable electricity generation is not	Add a new policy as follows: ENG – P10 Avoid the development of non-renewable electricity generation activities on the West Coast and facilitate the replacement of non-renewable energy sources, including the the use of fossil fuels, in electricity generation.

				<p>supported by national direction and this needs to be made clear in the chapter. It is considered inappropriate that non-renewable energy activities, by virtue of inclusion within the definition of 'energy activities', are considered in the same manner as renewable electricity generation activities given the NPS that applies solely to these activities (NPS – REG 2011). Manawa requests that the wording is amended throughout the Plan to refer to Renewable Electricity Generation (as opposed to energy activities) in all supporting policies. Further it requests that a policy be added to avoid the development of non-renewable energy generation activities on the West Coast, and facilitate the replacement of non-renewable energy sources, including the use of fossil fuels, in electricity generation.</p>	
<p>Manawa Energy Limited (Manawa</p>	S438.046	Energy Rules	Not Stated	<p>Manawa is very supportive of the separation of rules applying to Renewable Electricity Generation activities from those relating to INF</p>	<p>See definitions requests above. Amend terminology used in the ENG chapter to reflect the relief sought for changes to definitions, especially defined terms of:</p> <ul style="list-style-type: none"> • small and community- scale distributed electricity

<p>Energy) (S438)</p>			<p>activities. Manawa’s primary concern with the ENG rules is the extent to which these provide for the construction, operation, maintenance and upgrade of Renewable Electricity Generation activities in a manner consistent with the provisions of the NPS – REG 2011. This concern relates to the manner in which the Plan differentiates between Renewable Electricity Generation activities of various types and scales (and the terminology used in the Plan to express these differences), and the activity status afforded to these activities.As presently set out, Manawa does not consider that the energy chapter provisions give effect to the NPS-REG as they do not enable continuation of existing activities and establishment of new activities.DefinitionsSpecific submission points applying to Renewable Electricity Generation activities have been addressed in submissions on the Interpretation section of the Plan set out above. In</p>	<p>generation• minor upgrade• regionally significant infrastructure.Amend the structure of the rules to clearly step through the different activities relating to existing and new activities.Amend rules to ensure that activity status that applies gives effect to the NPS-REG and other higher order documents</p>
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			<p>particular, Manawa opposes the distinction between Renewable Electricity Generation activities based on the current definitions of the terms 'small scale', 'community scale' and 'large scale'. Manawa seeks to ensure that the terminology used in the pTTPP is consistent with that in the NPS – REG 2011. Manawa has also sought the inclusion of a definition for the term 'minor upgrade'. It considers that this is appropriate and is already used throughout the Plan. Manawa requests that the submission points in the remainder of this section reflect changes sought to terminology used in the Plan. Provision for the Operation, Maintenance, Upgrading and Establishment of Renewable Electricity Generation activities The rules mix activities relating to existing structures and facilities (operate, maintain, repair and upgrade) with activities relating to new structures and facilities (construction). This confuses the</p>	
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			<p>direction and intent of the provisions (enabling ongoing operation, maintenance, repair and minor upgrading of new facilities to not be adequately provided for). Manawa requests that the structure of the rules be amended to clearly step through the differences in existing and new activities. Activity Status Manawa strongly opposes the activity status given to a number of Renewable Electricity Generation activities, and considers that this is inconsistent with the policy direction provided for in the NPS – REG. In particular activities relating to existing hydro-electric generation schemes are not provided for such that the maintenance of an existing “large scale” dam is a full discretionary activity. Such an activity is essentially for the safety and resilience of renewable electricity generation schemes on the West Coast and needs to be provided for. In terms of other Renewable Electricity Generation activities, Rule 5 in effect determines</p>	
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			<p>that a wind farm unable to meet the requirements of the NZS 6808:2010 (Acoustics – Wind Farm Noise) is assessed as a non-complying activity. Manawa considers that this is inappropriate, particularly when considering that if the rules in the noise chapter default to restricted discretionary if not met. These are inappropriate activity status, for renewable electricity generation activities that are determined to be nationally significant and a matter of national importance. As outlined in the general section of this submission, support for existing renewables and provision for development of new renewables is a national priority and the current rules in the pTTPP do not sufficiently enable this to occur. Manawa requests that the rule structure be amended to better align with the intent for Renewable Electricity Generation activities as set out in higher order documents which can be summarised as: - Existing activity Operate Permitted</p>	
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				Maintain/Repair Permitted Minor Upgrade Permitted Upgrade (more than Minor) Permitted (limited in scale) RD Larger scale New activityConstruct new Permitted (limited in scale) RD all other scale activitiesTemporary Permitted up to 24 months RD longer periodInvestigations and meteorological Permitted (limited in scale)RD larger scale Non-renewable electricity generation Electricity generation activities that are not renewable Non-complying	
Manawa Energy Limited (Manawa Energy) (S438)	S438.047	Energy	Support	Manawa supports the inclusion of note 1 which reiterates where these rules apply to energy and renewable electricity generation activities, the rules in the INF chapter do not apply.	Retain Note 1 as notified.
Manawa Energy Limited (Manawa Energy) (S438)	S438.048	ENG - R1	Support	Manawa supports the retention of this rule in its current form.	Retain ENG – R1 as notified.
Manawa Energy	S438.049	ENG - R5	Support in part	Manawa supports this rule in part as it is essential that there be a	Replace ENG – R5 with the following: ENG - R5 The construction, operation,

<p>Limited (Manawa Energy) (S438)</p>			<p>permitted activity rule providing for the ongoing operation of renewable electricity generation activities and for the establishment of new smaller scale facilities. However, Manawa considers that:</p> <ul style="list-style-type: none"> • the terminology within the rule should be altered to apply to small and community scale distributed electricity generation use rather than simply small-scale activities (as previously discussed in the definitions section). • provision should be made for the operation, maintenance, repair and minor upgrade of existing renewable electricity generation activities as a permitted activities. At present the rules are entirely silent on the ongoing use of existing activities and there is no obvious activity status for this. At worst, this could mean that maintenance on large hydroelectricity structures is a discretionary activity. Clearly this is not appropriate. Amending this rule to explicitly provide for existing activities would ensure consistency with the provisions of the 	<p>maintenance, repair and upgrade of renewable electricity structures for small and community scale electricity generation, and</p> <p>The operation, maintenance, repair and minor upgrade of existing renewable electricity generation activities.</p> <p>Activity Status Permitted</p> <p>Where:</p> <p>1. Performance standards in Rule ENG - R1 are complied with; Solar panels do not exceed the permitted height in the relevant zone by more than 0.25m vertically;</p> <p>Wind turbines do not exceed 8m in height;</p> <p>Wind turbines comply with NZS 6808:2010</p> <p>Acoustics - Wind Farm Noise;</p> <p>Structures, buildings or impermeable surface for hydroelectricity generation must not exceed a footprint of 100m² or an increase in area from existing buildings/structures and surfacing of more than 10%; and</p> <p>Any building or structure must not be located within an existing esplanade reserve or strip.</p> <p>The maximum generation capacity for new small and community scale generation activities is 500kW.</p> <p>Activity status where compliance not achieved: Restricted Discretionary where performance standards 2, 3, 5, 6 and 7 are not complied with.</p>
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			<p>NPS – REG and is considered essential for the ongoing operation of these facilities, the nature of associated hazards within the West Coast and the associated necessity to ensure resilience of such (as it reflected in the strategic direction provisions of the pTTPP). • wind turbines do not need to be specified as ‘small scale’ as the performance standards for this rule limit them in height and scale. If a maximum number of turbines or a maximum scale of facility is considered necessary to ensure that this rule only allows smaller scale facilities to be permitted, then an additional performance standard can be added to limit the generation from such facilities • it is inappropriate, inequitable and unjustified to require activities not meeting the standard 4 (which applies to small scale wind turbines and compliance with NZS 6808: 2010 Acoustics – Wind Farm Noise) to be accorded non-complying activity status. The common activity status used</p>	<p>Discretionary where performance standard 4 is not complied with. Non-complying where performance standard 1 is not complied with.</p>
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				<p>elsewhere in the country for this situation is discretionary and that should be applied in this situation also. Having a non-complying activity status would not provide for the national direction seeking to enable renewable electricity generation activities. • that the size limits stipulated for land based structures, building or impermeable surface for hydroelectricity generation in clause 5 are too small to cover most existing schemes and will generally only apply to domestic scale new activities. This also limits the ability to undertake meaningful works to existing structures. Amended wording for this performance standard is proposed.</p>	
<p>Manawa Energy Limited (Manawa Energy) (S438)</p>	S438.050	ENG - R9	Support	<p>Manawa supports the inclusion of rules in the pTTPP enabling temporary activities required following the declaration of a national, regional or local state of emergency declaration to be undertaken as a permitted activity. These activities are vital to the functioning of regionally significant</p>	<p>Amend ENG – R9 as follows: ENG - R9 Temporary Electricity Generation Activities Where: 1. The temporary electricity generation activity is for up to a period of 24 months following a national, regional or local state of emergency declaration; 2. All performance standards in Rule ENG - R1 are complied with; and</p>

				<p>infrastructure, such as Renewable Electricity Generation activities, and the ability for the West Coast to recover from such events as quickly as possible without incurring delays and costs associated with obtaining any required resource consents. However minor consequential amendments have been suggested.</p>	<p>3. Any temporary structures are removed from the site when operation ceases and the site is rehabilitated.</p>
<p>Manawa Energy Limited (Manawa Energy) (S438)</p>	S438.051	ENG - R10	Support	<p>Manawa supports the inclusion of a specific rule for environmental monitoring and extreme weather event monitoring facilities, and meteorological facilities as permitted activities. These facilities also play a role in the operation of Renewable Electricity Generation activities, provide important information and are often required to ensure compliance with conditions of resource consent. However, Manawa considers that: the height and structure footprint provided for as a permitted activity under this rule is insufficient to be meaningful in providing for investigations into meteorological conditions. Slimline masts and towers should be</p>	<p>Amend ENG – R10 as follows:</p> <ol style="list-style-type: none"> 1. All performance standards in Rule INF - R1 are complied with; and 2. Monitoring equipment is limited to: <ol style="list-style-type: none"> a. Masts and towers with a maximum footprint of 4m² and a maximum height of 10m, or b. Other structures up to 4m in height and 25m² in area. <p>Activity status where compliance not achieved:</p> <p>Restricted Discretionary where performance standard 2 is not complied with. Non-complying where performance standard 1 is not complied with.</p>

				provided for to a greater height. the activity status for larger monitoring structures should not be non-complying as this would not be consistent with other structures in generally rural areas and would not give effect to the NPS-REG which seeks to enable such activities.	
Manawa Energy Limited (Manawa Energy) (S438)	S438.052	ENG - R14	Oppose	Manawa opposes this rule and seeks that it be deleted. The changes sought by Manawa include providing more clearly for activities that are permitted under rules ENG – R5 and ENG – R10, and further amendment to ENG – R15 that provides for the restricted discretionary status of activities not meeting those permitted rules. Other rules, such as ENG – R9, are considered to sufficiently address the status of temporary energy activities not meeting this standard. With the changes sought to definitions (to not separately define small, community and large activities) and the permitted activity status rule (R5) dealing with the scale of activities regardless of definition, there is no	Delete ENG – R14

				<p>necessity for this rule to address 'community scale' activities. This rule also deals with 'renewable energy investigation activities' which are not defined in the plan. The definition of "energy activity" includes energy investigation and it is unclear what the council may consider under this term. Usually within a district plan energy investigation would most commonly be meteorological measurements (noting other investigation would be covered by regional rules). This type of activity is covered by ENG - R10 so would not be lost if rule R14 is deleted. Similarly if activities under rule R9 dealing with temporary energy activities need to be escalated, then that can be to the restricted discretionary activity rule R15. For these reasons it considers that this rule is not required and seeks the deletion of such.</p>	
Manawa Energy Limited (Manawa	S438.053	ENG - R15	Oppose	<p>Manawa strongly opposes ENG – R15 as currently drafted. It does not consider that this rule gives sufficient effect to the provisions of</p>	<p>Amend ENG – R15 as follows:</p> <p>Upgrades, other than minor upgrades, and construction of renewable electricity generation</p>

<p>Energy) (S438)</p>			<p>the NPS – REG as it makes most renewable electricity generation projects straight into discretionary activity status. This is not appropriate when it is national direction to provide for significant increases in renewable electricity generation. Further, because there is no rule that provides for the maintenance, repair, operation and minor upgrading of existing renewable electricity generation activities (ie those Renewable Electricity Generation activities at a scale not meeting the definition of small and community scale distributed electricity generation) these automatically end up as discretionary activities under this rule. That is unreasonable as the ongoing operation of such activities is essential to the resilience and well being of the region, as well as to meeting the national direction. Manawa seeks that the rule is amended to restricted discretionary activity status, reworded for clarity and other amendments to the rule</p>	<p>activities (excluding wind) and renewable electricity generation activities not meeting rules R5, R9 and R10. Restricted Discretionary Activities. Discretion is limited to: a The benefits of the proposal to Aotearoa New Zealand meeting its zero carbon, climate change and greenhouse gas targets; b The benefits of the proposal to the local and regional community and to resilience for Te Tai o Poutini / the West Coast; c Any functional needs and operational needs associated with the design or location of the proposal; d The ability to mitigate any adverse effects of the proposal on the environment; e The degree to which the proposed activity will cause significant adverse effects on values identified and protected through Overlay Chapter provisions. Activity status where compliance not achieved: N/A</p>
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				to ensure consistency with other parts of its submission (particularly those relating to terminology).	
Manawa Energy Limited (Manawa Energy) (S438)	S438.054	ENG - R16	Support in part	<p>Manawa does not consider it appropriate to single out wind farms and to give them an activity status that is restrictive. Many other comparable district plans place wind farms at restricted discretionary activity status and this is an appropriate status to give effect to the NPS-REG. Further, to simplify the provisions, this wind farm rule could be combined with rule R15 above. Manawa also considers it inappropriate that a wind farm unable to comply with NZS 6608: 2010 Acoustics – Wind Farm Noise is afforded non-complying activity status. It is considered that discretionary status is appropriate to enable full consideration of the effects of wind farm noise. Discretionary activity status is commonly applied in other district plans that provide for wind farm noise above the NZS.</p>	<p>Amend ENG – R16 as follows Activity Status Restricted Discretionary Where: 1. This does not comply with New Zealand Standard NZS6808:2010 Acoustics - Wind Farm Noise.</p> <p>Discretion is limited to: a Degree of non-compliance with ENG – R5; b Locational, technical and operational constraints; c Benefits to the community. Activity status where compliance not achieved: Discretionary</p>

Manawa Energy Limited (Manawa Energy) (S438)	S438.055	ENG - R17	Oppose	<p>Manawa considers it inappropriate that a wind farm unable to comply with NZS 6608: 2010 Acoustics – Wind Farm Noise is afforded non-complying activity status. It is considered that discretionary status is appropriate.</p>	<p>Amend ENG – R17 as follows: ENG - R17 Any renewable electricity generation activity which does not comply with New Zealand Standards NZS6808:2010 Acoustics - Wind Farm Noise. Activity Status Discretionary</p>
Manawa Energy Limited (Manawa Energy) (S438)	S438.056	ENG - R20	Oppose	<p>Manawa considers that the non-complying status of renewable electricity activities not permitted, controlled, restricted discretionary or discretionary is not appropriate and does not reflect the enabling provisions and direction of the NPS – REG and the RPS. It considers that these activities should be provided for as restricted discretionary or discretionary activities. To achieve this, none of the renewable electricity activities should be covered by this rule.</p>	<p>Amend ENG – R20 as follows: Activities that do not meet Rules ENG - R12 or ENG - R13 Activity Status: Non-Complying</p>
Manawa Energy Limited (Manawa Energy) (S438)	S438.057	Energy Rules	Support	<p>Manawa also considers that any energy activities that do not involve renewable electricity generation should be dealt with as non-complying activities. This would be consistent with the intent of the national policy framework, and New</p>	<p>Add a new rule ENG – R21: ENG-R21 Non-renewable Electricity Generation Activities Activity Status: Non-Complying</p>

				Zealand's climate change obligations.	
Manawa Energy Limited (Manawa Energy) (S438)	S438.058	Overview	Support	Manawa supports the clarification of the interrelationship between the INF and ENG chapters of the Plan. It considers that this provides clarity for Plan users and will aid in the efficient administration of the Plan.	Retain the third sentence of the fourth paragraph of the Overview as notified.
Manawa Energy Limited (Manawa Energy) (S438)	S438.059	Overview	Support	A number of policy provisions relating to hazardous substances apply to 'major hazard facilities'. This term is not defined in the Plan. Manawa considers that the definition of such a term is required to provide clarity to Plan users, and has requested the inclusion of such a term in the Interpretation section of the Plan.	Cross reference to new definition of the term 'major hazard facility' requested.
Manawa Energy Limited (Manawa Energy) (S438)	S438.060	NHO3	Support in part	Manawa considers that the objective could be more appropriately worded to better recognise that some renewable electricity generation activities are functionally and operationally required to be within or adjacent to water. As a consequential change of other submission points, Manawa also seek that the term 'critical	Amend NH – O3 as follows: To encourage : 1. The location of regionally significant infrastructure outside areas of significant natural hazard risk, except where there is no reasonable alternative, or where there is a functional or operational need to locate in these areas ; and 2. The design of regionally significant infrastructure is resilient to hazard

				infrastructure' is replaced with 'regionally significant infrastructure'.	events and will not to exacerbate natural hazard risk to people and property.
Manawa Energy Limited (Manawa Energy) (S438)	S438.061	NHP12	Support	Manawa supports the recognition given in the policy to the functional and operational needs of activities.	Retain NH – P12(g) as notified.
Manawa Energy Limited (Manawa Energy) (S438)	S438.062	HH - O2	Support	Manawa schemes incorporate a range of heritage items and protect these insitu including providing for ongoing use of these as part of the hydroelectricity schemes. On this basis, Manawa supports Objective 2 in that it provides for development sensitive to identified values.	Retain HH – O2 as notified.
Manawa Energy Limited (Manawa Energy) (S438)	S438.063	HH - P4	Support in part	Manawa supports the enabling provisions of this policy. It is considered that reference should be added to the maintenance of identified heritage values 'where practicable' to recognise different contexts in which heritage items may be utilised and other considerations associated with this use (such as health and safety matters). In some cases, the continued use of heritage	Amend HH – P4 as follows: Enable the use, including adaptive reuse of historic heritage items identified in Schedule One, while ensuring that their identified values are maintained, where practicable.

				items will not enable maintenance to the fullest extent.	
Manawa Energy Limited (Manawa Energy) (S438)	S438.064	HH - P5	Support in part	Manawa considers that external alterations to a heritage resource may be required to enable continued use of that resource, or for maintenance and repair purposes. It is recommended that the policy is amended to provide for these purposes.	Amend HH – P5 as follows: When considering proposals for external alteration of historic heritage items identified in Schedule One, the following matters shall be considered: a.Any external alteration will not significantly detract from an item of historic heritage value; or b.The alterations are for the primary purpose of improving structural performance, fire safety or physical access.; or c.The alterations are required to enable the continued use of the item, or d.The alterations are required for maintenance or repair purposes.
Manawa Energy Limited (Manawa Energy) (S438)	S438.065	HH - P7	Support in part	Manawa considers that public safety risk and the efficient functioning of regionally significant infrastructure are matters which should be considered in relation to this issue. It is recommended that the policy is amended to provide for these purposes.	Amend HH – P7 as follows: Demolition and destruction of historic heritage items identified in Schedule One will not be allowed unless it can be demonstrated, through investigation and assessment by a suitably qualified heritage professional that: a The extent of the work required to retain the heritage items is of such a scale that the heritage values and integrity of the heritage item would be significantly compromised; b The costs to retain or repair the heritage item would be unreasonable; c All other viable alternatives, including relocation and

					repositioning have been fully considered; d The item poses a significant risk to public safety; e the item is adversely affecting the efficient functioning or operation of regionally significant infrastructure.
Manawa Energy Limited (Manawa Energy) (S438)	S438.066	HH - R3	Support in part	Manawa has concerns with the current approach of including district wide earthworks rules under the General District-Wide Matters EW Earthworks chapter (that include rules for overlay areas) and additional rules controlling earthworks within each overlay chapter such as this one. This approach is confusing and leads to duplication of control. Please refer to more expansive feedback on this issue, contained in the EW Earthworks response below. Manawa seeks that this rule be amended to explicitly provide for minor earthworks that are necessary for maintenance and repair of regionally significant infrastructure.	Amend HH – R3 as follows: Where: 1. These are earthworks that will not result in damage, demolition or destruction of heritage items and are associated with: a. An activity permitted under Rule HH - R1 or Rule HH - R2; ... g. Maintaining roads, tracks, carparks, accessways or paved areas within the footprint or modified ground compromised by the existing road, track, carpark, accessway or paved area; and or h. Maintenance and repair of regionally significant infrastructure within the existing footprint of that infrastructure; and 2. An Archaeological Authority ...

Manawa Energy Limited (Manawa Energy) (S438)	S438.067	HH - R6	Support	Manawa supports restricted discretionary activity status for this rule.	Retain HH-R6 as notified.
Manawa Energy Limited (Manawa Energy) (S438)	S438.068	HH - R8	Support	Manawa supports restricted discretionary activity status for this rule.	Retain HH-R8 as notified.
Manawa Energy Limited (Manawa Energy) (S438)	S438.069	HH - R10	Oppose	Manawa considers that this rule is unreasonably restrictive of nationally significant activities and that there is no good reason for such activities to be treated more restrictively than any other buildings or structures. Placing energy and infrastructure activities at discretionary activity status is the same activity status as demolition of the heritage item but does not have the same impact. The only issues of relevance for consideration are the impact on the heritage item and thus should be no more than restricted discretionary	Delete HH-R10.

				and addressed in the same way as any other buildings or structures.	
Manawa Energy Limited (Manawa Energy) (S438)	S438.070	SASM - P13	Support in part	In accordance with other submission points made, Manawa requests that the term 'critical infrastructure' is replaced with 'regionally significant infrastructure' to ensure the use of consistent terminology throughout the pTTPP.	Amend SASM – P13(b) as follows: Maintenance, operation, repair and upgrading of existing network utility structures and regionally significant infrastructure.
Manawa Energy Limited (Manawa Energy) (S438)	S438.071	SASM -R2	Support in part	Manawa seeks that provision is made for earthworks associated with the maintenance or repair of existing regionally significant infrastructure as a permitted activity in specified SASM areas.	Amend SASM- R2 by adding a new clause as follows: 1. These are earthworks associated with: i. Burials at urupā; or ... iv. Maintaining roads/tracks within the footprint or modified ground compromised by the existing road/track; or v. for the maintenance or repair of existing regionally significant infrastructure; and
Manawa Energy Limited (Manawa Energy) (S438)	S438.072	SASM -R9	Support in part	Manawa considers that the term 'network utility structure' should be replaced by 'regionally significant infrastructure'. Manawa Energy is not a network utility operator under the provisions of the Resource Management Act 1991, however the activities it undertakes (and associated assets) are identified as nationally and regionally significant infrastructure. The term 'regionally significant infrastructure'	Amend SASM R9 as follows: Maintenance, Repair and Upgrading of Regionally Significant Infrastructure on or within Sites and Areas of Significance to Māori identified in Schedule Three

				encompasses a number of network utility structures within the West Coast, and is considered to be a more appropriate term upon which to base this rule. This terminology is consistent with other changes sought by Manawa throughout the pTTPP.	
Manawa Energy Limited (Manawa Energy) (S438)	S438.073	SASM - R10	Support in part	Manawa considers that the term 'network utility structure' should be replaced by regionally significant infrastructure. Manawa is not a network utility operator under the provisions of the Resource Management Act 1991, however the activities it undertakes (and associated assets) are identified as nationally and regionally significant infrastructure. The term 'regionally significant infrastructure' encompasses a number of network utility structures within the West Coast, and is considered to be a more appropriate term upon which to base this rule. This terminology is consistent with other changes sought by Manawa throughout the pTTPP.	Amend SASM – R10 as follows: Maintenance, Repair and Upgrading of Regionally Significant Infrastructure on or within Sites and Areas in Schedule Three – Sites and Areas of Significance to Māori where Permitted Activity Standards are not met Where: ... 2. The work is in an area that has previously been disturbed by the regionally significant infrastructure ; and ...

Manawa Energy Limited (Manawa Energy) (S438)	S438.074	Overview	Support in part	<p>In general, Manawa has significant concerns with the approach taken in this chapter to identification and protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna as required under section 6(c) of the Act. The proposed approach relies heavily on applicants to provide information on areas of significant indigenous vegetation and significant habitats of indigenous fauna through any resource consent applications and this is generally the primary tool for identification of these areas. This is not considered to be a robust approach and it is considered unreasonable to put the cost of this process on to applicants alone. This approach means that all applicants will face considerable uncertainty in identifying consenting needs and may face unseen and unexpected hurdles in obtaining consents. It is an unreasonable derogation of the Council's responsibilities to recognise and provide for matters of</p>	<p>Reconsider, review and amend the approach to and all provisions relating to identification of significant natural areas, to, at least, take into account the exposure draft of the NPS-Indigenous Biodiversity (or the gazetted version if that comes into effect before the pTTPP becomes operative).</p>
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				<p>national importance set out in the Act. While Manawa supports the need to protect significant biodiversity values, it is considered unreasonable to not specify these in the District Plan for all parties to see and to understand the impacts of. Manawa opposes the current approach and strongly recommends that this be reconsidered. It considers that a comprehensive and consistent investigation into significant natural areas, through a transparent and robust process, needs to be undertaken before any policy or provisions are included in the TTPP. It also notes that the National Policy Statement on Indigenous Biodiversity is due to be gazetted in late 2022, and that this may require amendments to the pTTPP to ensure consistency with a higher level policy document.</p>	
<p>Manawa Energy Limited (Manawa</p>	S438.075	ECO- O2	Support in part	<p>Manawa supports provisions for appropriate use within areas of significant indigenous vegetation and significant habitats of indigenous fauna where the values</p>	<p>Amend ECO – P2 as follows: To provide for appropriate subdivision, use and development within areas of significant indigenous vegetation and significant habitats of indigenous fauna .</p>

<p>Energy) (S438)</p>				<p>of the area can be maintained or enhanced. It considers however that the focus at an objective level should be simplified to provision for appropriate activities, while the mechanism for doing this can come through the policy.</p>	
<p>Manawa Energy Limited (Manawa Energy) (S438)</p>	<p>S438.076</p>	<p>ECO - P1</p>	<p>Oppose</p>	<p>Manawa generally opposes the identification of areas of significant indigenous vegetation and fauna habitat through the resource consent process and considers that it places an unnecessary and unjustified burden on applicants. It will also lead in inconsistency between how different areas and environments are assessed, given the assessments would not be conducted by the same experts, nor any requirements in the pTTPP to follow particular predefined criteria.</p>	<p>Amend ECO – P1 as follows: Identify areas of significant indigenous vegetation and fauna habitat in accordance with the criteria set out in Appendix 1 of the West Coast Regional Policy Statement 2020, and identify these areas in Schedule Four of the Plan.</p> <p>1.In the Grey District these areas are identified in Schedule Four;</p> <p>2.In the Buller and Westland Districts:</p> <p>i.The criteria set out in Appendix 1 of the West Coast Regional Policy Statement will be used to assess significance;</p> <p>ii.Buller and Westland district wide assessment, identification and mapping of significant natural areas will be undertaken by suitably qualified and experienced experts and completed by June 2027; and</p>

					iii. Identified areas of significant indigenous vegetation and fauna habitat will be added to Schedule Four through a Schedule One Plan Change.
Manawa Energy Limited (Manawa Energy) (S438)	S438.077	ECO - P2	Support in part	Manawa supports provision for appropriate use within areas of significant indigenous vegetation and significant habitats of indigenous fauna where the activity will have no more than minor adverse effects on the significant indigenous vegetation or fauna habitat. Manawa seeks that the benefit of activities should be a criteria in the consideration of allowance of activities to locate in the areas covered by the policy, and further the operational and functional needs of specific activities. Amendments are required to the policy to make it clear that the considerations outlined in ECO – P2 are all exclusive.	Amend ECO – P2 as follows: Allow activities within areas of significant indigenous vegetation or significant habitats of indigenous fauna where: a. ... d. The activity has a functional or operational need to be located in the area; or e. The activity has no more than minor adverse effects on the significant indigenous vegetation or fauna habitat; or f. These activities contribute to New Zealand’s social, economic, cultural and environmental wellbeing; or g. These activities contribute to climate change mitigation or adaptation measures.
Manawa Energy Limited (Manawa Energy) (S438)	S438.078	ECO - P6	Oppose in part	Manawa considers that ECO P6, P7 and P9 should be considered in combination, and that there should be sufficient consistency between these provisions to provide certainty for Plan users. In addition, it	Amend ECO – P6 as follows: When assessing consents for subdivision, use and development in areas of significant indigenous vegetation and significant habitats of indigenous fauna, enable activities which will not: a. Prevent an indigenous species or community being

			<p>considers that these provisions are not sufficiently consistent with those contained in the Regional Policy Statement. Manawa supports the specific inclusion and reference to renewable electricity generation activities, and acknowledgment of the location of these activities within areas of significant indigenous vegetation and significant habitats of indigenous fauna. In general, Manawa considers that these provisions should:</p> <ul style="list-style-type: none"> • Be consistent with those included in the RPS and use the same terms/ approaches as this higher order document and the NPS – REG 2011, and the effects management hierarchy outlined in the NPS – FW (where applicable and appropriate). • Ensure that those matters listed in P6 are accurate and measurable for all parties. The term ‘avoid’ is very strong and directive language, and Manawa Energy consider that this should only be used where essential to ensure the outcomes of the Act. • Beyond the matters covered in P6, the policies 	<p>able to persist in their habitats within their natural range in the Ecological District;</p> <p>b. Result in a degradation of the threat status of category one or two species listed in the Threatened Environment Classification at the Ecological District level [as at 14 July 2022]; and</p> <p>c. Result in a reasonably measurable significant reduction in the local population of threatened taxa in the Department of Conservation Threat Categories 1 – 3a -nationally critical, nationally endangered and nationally vulnerable.</p>
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			<p>should focus less on 'avoidance' and more on enabling provisions, particularly as these relation to the maintenance, operation, upgrading and development of Renewable Electricity Generation and regionally significant infrastructure. • It is not appropriate to consider activities outside identified significant natural areas as part of cumulative effects as these are not subject to ECO rules. It is unreasonable to penalise an activity in an identified area based on other unrelated activities further afield. • It is necessary to recognise the functional and operational need for critical infrastructure to operate or establish within areas of significant indigenous vegetation and significant habitats of indigenous fauna. Manawa also considers it important that the pTTPP does not rely on external documents which are not clearly referenced and may be subject to change (thereby providing a lack of certainty for Plan users). These references should be removed, or if</p>	
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				kept then they need to be linked to a specific version or date of any relevant document and what specific parts of that document/s are being referenced.	
Manawa Energy Limited (Manawa Energy) (S438)	S438.079	ECO - P7	Oppose in part		Amend ECO – P7 as follows: When assessing resource consents in areas of significant indigenous vegetation and significant habitats of indigenous fauna, consider the following matters: a. The necessity for the activity to provide for regionally significant infrastructure or renewable electricity generation; b. ... d. The cumulative effects of activities within any area of significant indigenous vegetation or habitat; h. The appropriateness of any biodiversity offsetting or compensation in accordance with Policy 9 to offset any significant residual adverse effects that remain after avoiding, remedying and mitigating measures have been applied; i. the functional or operational need for activities to locate in that area
Manawa Energy Limited (Manawa	S438.080	ECO - P9	Oppose in part		Amend ECO – P9 as follows: Provide for biodiversity offsets and compensation to manage significant residual adverse effects of an activity where: a) The goal of the biodiversity offsets is no net loss

Energy) (S438)					and, preferably, a net gain of biodiversity; and b) The conservation outcomes are measurable
Manawa Energy Limited (Manawa Energy) (S438)	S438.081	ECO - R1	Support in part	To ensure consistency with other comments, Manawa requests that this rule makes provision for existing renewable electricity generation activities and temporary energy activities. It also seeks that the policy clearly indicates that the various sub clauses of clause (iii) are exclusive.	Amend ECO – R1 (3)(ii) and (iii) as follows: i. The maintenance, operation, upgrading and repair of lawfully established tracks, fences, structures, buildings, regionally significant infrastructure, network utilities, renewable electricity generation activities or natural hazard mitigation activities, or iii. For the installation of temporary electricity generation activities or network activities following a regional or local state of emergency declaration, or ...
Manawa Energy Limited (Manawa Energy) (S438)	S438.082	ECO - R2	Support	Manawa supports the explicit recognition of and provision for renewable electricity activities within the coastal environment.	Retain ECO – R2 (1)(ii) as notified.
Manawa Energy Limited (Manawa Energy) (S438)	S438.083	Natural Features and Landscapes	Not Stated	Manawa has significant concerns regarding the approach taken to identification and protection of outstanding natural features and landscapes. The approach does not appear to be robust or based on current best practice in undertaking such work for a District Plan. Manawa considers that this section needs to clearly identify the manner	Revise the policies to properly work through the approach to identification, management and protection of ONFL. Revise the policies to clearly articulate the criteria and methodology for identification of ONFL. Revise the policies to provide a clear hierarchy through specific wording that steps through what is enabled, provided for, managed and avoided. Do not use the term ‘minimise’ as this has no agreed meaning and would be better with ‘manage’ which covers a range of methods, or

			<p>in which the identification, management and protection of ONFL will be achieved. The policy structure at present lacks an identification of ONL / or criteria / or methodology used; and subsequently progresses straight to the manner in which activities are enabled, provided for, managed and avoided. As a result it does not recognise the location of existing modifications to this landscape – a matter which Manawa considers to be a fundamental flaw (and envisages that this will become problematic at the stage in which resource consent applications to undertake activities in ONFLs are processed and assessed). Manawa also considers that the methodology used for the Landscape Study is flawed. This flawed methodology has resulted in substantial errors in the mapping and identification of landscapes within the pTTPP. The methodology utilised has not appropriately articulated descriptions and characterisations of</p>	<p>avoid/remedy/mitigate as clearly understood terms. Amend the landscape study and associated landscape schedules to include:</p> <ul style="list-style-type: none">•descriptions and characterisations of landscape generally•identification of values within each of the ONFL•identification of existing activities and modifications within the ONFL. Amend the mapping of ONFL to improve accuracy and to follow best practice.
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				<p>landscape generally (only outstanding landscapes), nor has it provided the identification of values within each of the ONFL. These flaws also lead to inaccuracies of mapping of ONFL areas as this has been done inaccurately and at an inappropriate scale. Some of these submission points are dealt with in more detail in relation to Part 4 of the Plan (Appendices dealing with landscapes) but are interrelated to matters raised in relation to this chapter of the Plan and should be considered collectively.</p>	
<p>Manawa Energy Limited (Manawa Energy) (S438)</p>	S438.084	Overview	Amend	<p>Manawa acknowledges the protection afforded to outstanding natural features and landscapes (ONFL) under the provisions of the Resource Management Act 1991. These areas cover very large tracts of the West Coast and impact on large areas of private land (as well as the very large areas of public conservation estate). In some cases, parts of these ONFL areas contain significant areas of modification or large existing structures and</p>	<p>Amend the second paragraph of the Overview as follows: ... These areas may also include regionally significant infrastructure, renewable electricity generation activities, and other elements of the built environment and have varying degrees of modification.</p>

				<p>facilities, including state highways, transmission lines, and hydroelectric power schemes. Manawa seeks that the pTTPP continues to acknowledge this this modification and existing use, particularly in the context of existing regionally significant infrastructure, Renewable Electricity Generation and other elements of the built environment. Manawa supports the explicit recognition of renewable electricity generation activities within Outstanding Natural Features and Outstanding Natural Landscapes (noting further comments below). To ensure consistency with other submission points it is requested that the term 'critical infrastructure' is replaced with 'regionally significant infrastructure'.</p>	
<p>Manawa Energy Limited (Manawa Energy) (S438)</p>	S438.085	NFL - O1	Support in part	<p>Manawa considers that Objective 1 should be simplified to refer just to protecting the values of outstanding natural landscapes and outstanding natural features. Reference to the maintenance and enhancement of these features is inconsistent with</p>	<p>Amend NFL – O1 as follows: The values of outstanding natural landscape and outstanding natural features on the West Coast/Te Tai o Poutini are protected from inappropriate subdivision, use and development</p>

				the wording of Section 6(b) of the Resource Management Act 1991.	
Manawa Energy Limited (Manawa Energy) (S438)	S438.086	Natural Features and Landscapes Policies	Amend	<p>Manawa requests the inclusion of a new policy that provides for the identification of ONFL, and the criteria or methodology upon which such an identification is based. Manawa considers that this is a crucial step in achieving the requirements of Section 6 (b) of the Resource Management Act 1991, and that the identification of outstanding natural features and development should be undertaken in a transparent manner outlined in the District Plan, with clear identification of the values associated with these features.</p>	<p>Add a new policy NFL – P1 as follows: Identify the District’s landscapes by:</p> <p>a. assessing the values and characteristics of the landscapes according to the following criteria:</p> <p>i. biophysical (abiotic, biotic); and</p> <p>ii. sensory (legibility, naturalness, vividness, coherence, aesthetic, transient values); and</p> <p>iii. associative (shared and recognised values, mana whenua values, historic heritage associations); and</p> <p>b. identifying landscapes, based on their values and characteristics, on the planning maps as Outstanding Natural Features, or Outstanding Natural Landscapes; and</p> <p>c. describing the values and characteristics of each Outstanding Natural Feature, or Outstanding Natural Landscape within Schedules Five and Six.</p> <p>Amend the Plan by consequentially renumbering Plan provisions and making any other necessary to related changes to give effect to the relief sought.</p>
Manawa Energy Limited (Manawa Energy) (S438)	S438.087	NFL - P1	Support in part	<p>Manawa supports the intent of this policy and the specific recognition of infrastructure within ONFL areas. However, renewable electricity generation facilities are provided for by a number of clauses within this policy which could cause some</p>	<p>Amend NFL – P1 as follows:</p> <p>Provide for activities within outstanding natural landscapes described in Schedule Five and outstanding natural features described in Schedule Six where they do not significantly adversely affect the values that contribute to a natural feature or landscape being outstanding and are for:</p>

			<p>confusion. Manawa requests that changes to the policy wording is made to clearly provide for the operation, maintenance and upgrading of existing electricity generation infrastructure activities, and the establishment of new renewable electricity generation facilities where there is a functional need for it to be located within these areas. Manawa notes that the specific values upon which the identification of outstanding natural features and landscapes has been based are not included within the Plan. It considers that this omission, coupled with the lack of recognition of existing modifications within ONFL, makes it difficult for both Councils and Plan users to implement the provisions of the Plan or to understand how this policy would apply. It is also noted that this policy requires activities to “not adversely affect values”, however Policy 2 below requires “avoid significant adverse effects on values”. This difference in</p>	<p>a. Existing land uses and lawfully established activities including existing network utilities, renewable electricity generation activities, agricultural, horticultural and pastoral activities; b.Conservation activities; c.Recreational activities; d.Natural hazard mitigation activities; e.Operation, maintenance and upgrade of renewable electricity generation activities. f.Operation, maintenance and upgrading of network infrastructure; g. Establishment of new infrastructure and renewable electricity generation activities where there is a functional need for it to be located in these areas; h.Poutini Ngāi Tahu uses; or i.The alteration, maintenance or removal of existing buildings or structures. Insert descriptions of the values of all outstanding natural features and landscapes within Schedules Five and Six to enable impacts on the values to be assessed. Include accurate descriptions of the existing modifications within all outstanding natural features and landscapes within Schedules Five and Six to provide a baseline for assessment.</p>
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				terminology is confusion and needs to be reconsidered.	
Manawa Energy Limited (Manawa Energy) (S438)	S438.088	NFL - P2	Support in part	<p>Manawa supports this policy in part, specifically the reference to the identification of specific values of ONFL in Schedules Five and Six of the Plan. However, it is noted that the specific values upon which the identification of outstanding natural features and landscapes has been based are not included within the Plan or schedules. Manawa considers that this omission, coupled with the lack of recognition of existing modifications within ONFL, makes it difficult for both Councils and Plan users to implement the provisions of the Plan. This is a significant omission and fundamental to the ability to accurately protect ONFL and to implement the policy approach. Manawa requests that the policy is amended to recognise practicability (as opposed to possibility). It notes that the term 'practicable' is used in other parts of the pTTPP and in the West Coast Regional Policy</p>	<p>Amend NFL – P2 as follows: Where practicable, 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 practicably be avoided, ensure that such adverse effects are remedied or, mitigated, or compensated if appropriate. Insert descriptions of the values of all outstanding natural features and landscapes within Schedules Five and Six to enable impacts on the values to be assessed. Include accurate descriptions of the existing modifications within all outstanding natural features and landscapes within schedules five and six to provide a baseline for assessment. Review the use of the effects management hierarchy throughout the pTTPP and ensure that it is accurately applied.</p>

			<p>Statement as well as other higher order documents. All things are possible however many things may not be practicable and it is important that accurate terminology is used. Additionally, Manawa notes that offsetting is not an appropriate method of managing adverse effects on landscape values. The concept of offsetting is based around 'like for like' replacement of something lost with something gained, created or protected. This is particularly used in the biodiversity area and is subject to well established international guidance and application. The ability to remove or impact on landscape values, but then to offset that effect with new landscape values is tenuous and not common practice. Compensation is a valid consideration for impacts on landscape values. There appears to be some confusion throughout the pTTPP in the application of the terms offsetting and compensation especially, but also in the use of the effects management hierarchy. This</p>	
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				needs to be reviewed throughout the pTTPP and correct referencing used throughout. The effects management hierarchy is now well established through higher order documents but needs to be accurately integrated into the pTTPP. Further, use of the terms offsetting and compensation should relate to residual effects after effects have been avoided, remedied or mitigated. For reference, the effects management hierarchy is well set out in the NPS for Freshwater Management 2020 (in water terms).	
Manawa Energy Limited (Manawa Energy) (S438)	S438.089	NFL - P3	Support	Manawa supports this policy which recognises existing activities and modification within ONFL.	Retain NFL-P3 as notified.
Manawa Energy Limited (Manawa Energy) (S438)	S438.090	NFL - P4	Support in part	Manawa seeks that Policy 4 is amended to provide some recognition of the operational and functional need of infrastructure and Renewable Electricity Generation activities to locate in these areas, and the practicality of	Amend NFL – P4 as follows: Require that new buildings, structures within outstanding natural features or landscapes manage any adverse visual effects by: a. Ensuring the scale, design and materials of the building and/or structure are appropriate in the location where practicable ;

				incorporating/utilising the design elements specified in the policy. Further, it opposes the use of subjective terminology such as 'minimise' and 'limiting'.	b. Using naturally occurring building platforms, materials and colour that blends into the landscape where practicable ; and c. Reducing the prominence or visibility of buildings and structures including by integrating it into the outstanding natural feature or landscape.
Manawa Energy Limited (Manawa Energy) (S438)	S438.091	NFL - P5	Support in part	Manawa supports the specific recognition of the functional, technical and locational needs of activities to be sited in particular locations; national, regional and local benefits of an activity; and the reference to public safety considerations. In accordance with other submission points, Manawa requests that the term 'minimise' is replaced with the term 'manage'.	Retain Clauses e, h and Resource Management Act of NFL – P5 as notified. Amend the first sentence of the policy as follows: Manage adverse effects on outstanding natural landscapes and outstanding natural features by considering the following matters when assessing proposals for land use or subdivision...
Manawa Energy Limited (Manawa Energy) (S438)	S438.092	NFL - R1	Support in part	Manawa generally supports the rule, however considers that clarification is required to ensure that the pTTPP explicitly recognises that earthworks, structures and vegetation clearance for Renewable Electricity Generation activities provided for in the Ecosystems and Biodiversity Chapter (which are also located within an ONFL) are permitted. To ensure consistency with other submission	Amend NFL – R1 as follows: Maintenance, operation and repair of lawfully established buildings, structures, network utilities, renewable electricity generation activities, fence lines, drains, roads, railway, regionally significant infrastructure and tracks within an Outstanding Natural Landscape described in Schedule Five or Outstanding Natural Feature described in Schedule Six. Activity Status Permitted. Where:

				points it is requested that the term 'critical infrastructure' is replaced with 'regionally significant infrastructure'.	1. Earthworks, structures and vegetation clearance applying to renewable electricity generation activities are permitted under the Energy and Ecosystems and Biodiversity chapters.
Manawa Energy Limited (Manawa Energy) (S438)	S438.093	NFL - R3	Support in part	To ensure consistency with other submission points it is requested that the term 'critical infrastructure' is replaced with 'regionally significant infrastructure'.	Amend NFL – R3 as follows: Where: The natural hazard mitigation activities are to protect regionally significant infrastructure;
Manawa Energy Limited (Manawa Energy) (S438)	S438.094	NFL - R4	Support	Manawa supports the retention of NRL – R4 in its current form.	Retain NFL – R4 as notified.
Manawa Energy Limited (Manawa Energy) (S438)	S438.095	NFL - R5	Support in part	A number of assets owned and operated by Manawa are located within areas identified as Outstanding Natural Landscapes and some of these structures and buildings are already of substantial scale. It considers that the maximum height limits for buildings and structures stipulated is impractical, and does not recognise the nature of these assets or their existing scale. Manawa seeks the	Amend NFL – R5 as follows: Additions or alterations to buildings and structures, and ancillary earthworks and vegetation clearance within an Outstanding Natural Landscape described in Schedule Five or Outstanding Natural Feature described in Schedule Six. Activity Status Permitted 1. The maximum height of new buildings and structures above ground level is 5m. 2. The maximum height of existing buildings and structures greater than 5m in height above ground

				<p>buildings and structures associated with renewable electricity generation activities are exempt from these provisions or at least that the maximum height of the additions or alterations to the existing buildings is amended to allow for some additional height to align with the approach in the ENG and INF chapters. Further, it seeks that ancillary earthworks and vegetation clearance are provided for where incorporated into such activities. It considers that these are critical and related components of works required to undertake additions or alterations to buildings and structures.</p>	<p>level does not exceed an additional 30% increase in total height.</p>
<p>Manawa Energy Limited (Manawa Energy) (S438)</p>	S438.096	NFL - R6	Support in part	<p>Manawa considers that NFL – R6 as currently written is unclear, and seeks that amendments are made to clarify the applicability of Clause 3) to any activities undertaken in accordance with this rule. Further it requests that the wording of Clause 2b) be amended to refer to Renewable Electricity Generation activities specifically. It is also noted</p>	<p>Amend NFL – R6 as follows: Activity Status Permitted Where: 1.All performance standards for Earthworks Rule EW – R1 are complied with; and 2.This is ancillary to: a.An infrastructure activity undertaken by a network utility operator in accordance with the Permitted Activity standards in Infrastructure Rule INF – R7; or b.Any renewable electricity generation activity in accordance with the Permitted Activity standards in</p>

				that Renewable Electricity Generation activities are not undertaken by a network utility operator.	Energy Rule ENG – R1 3.For other earthworks (beyond those provided for in clause 1 and 2 above), the following standards are complied with: a)The cut height or fill depth does not exceed one metre vertically; b)No more than 500m3 of earthworks are undertaken/12 month period/site; and c)The earthworks are undertaken outside of the Coastal Environment
Manawa Energy Limited (Manawa Energy) (S438)	S438.097	NFL - R8	Support in part	Manawa is concerned that the Plan as drafted contains inconsistencies in exemptions provided to energy activities, network utility operators and Renewable Electricity Generation providers. It seeks that similar exemptions in this rule provided to network utility operators are also provided to Renewable Electricity Generation activities. Alignment with other activities is important to provide consistency.	Amend NFL – R8 as follows: Activity Status Permitted Where the structure is: 1.A fence; or 2.Associated with stock water reticulation including tanks, pipes and water troughs; or 3.For parks facilities or parks furniture in any Open Space Zone; or 4.For a network utility (including customer connections) in accordance with the Permitted Activity standards for Infrastructure in Rule INF – R7; or 5.For a small-scale renewable electricity generation activity where: a.The maximum height is 5m above ground level; and b.The gross floor area of any building does not exceed 100m2; or 6. For agricultural, pastoral and horticultural activities or any accessory building where: a.The maximum height is 3m above ground level; and

					b.The gross floor area of any building does not exceed 100m2
Manawa Energy Limited (Manawa Energy) (S438)	S438.098	NFL - R9	Support in part	Manawa generally support the provisions of R9, however consider that these provisions should be extended to also apply to temporary energy activities required to be undertaken within outstanding natural features and landscapes. These activities are permitted by virtue of Rule ENG – R5, and would ensure continuity of such provisions across various Overlay layers. To ensure consistency with other submission points it is requested that the term ‘critical infrastructure’ is replaced with ‘regionally significant infrastructure’.	Amend NFL – R9 as follows: Activity Status Controlled Where: 1.These are Temporary Electricity Generation Activities undertaken in accordance with ENG – R9, or 2.These are required to protect Regionally Significant Infrastructure; and 3.These will not destroy any Outstanding Natural Feature identified in Schedule Six or the values which make it Outstanding.
Manawa Energy Limited (Manawa Energy) (S438)	S438.099	NFL - R10	Support in part	Manawa considers that consistent terminology should be used throughout the pTTPP, and that this rule should be widened in scope to provide for installation, development, operation and maintenance of Renewable Electricity Generation facilities, and associated activities and infrastructure (consistent with the	Amend NFL – R10 as follows: Activity Status Controlled Where: 1.These are for: a)Walking/cycling tracks; b)Roads, farm tracks or fences; c)Installation of network utility infrastructure; or d)Installation, upgrade, operation, repair and maintenance of a renewable electricity generation activity ; or

				<p>provisions of the NPS – REG 2011). Manawa also opposes the activity status afforded to those activities which do not comply with the rule. It considers that such activities should be afforded restricted discretionary activity status. Such status is consistent to that afforded to other similar activities which do not comply with specific rules. To ensure consistency with other submission points it is requested that the term ‘critical infrastructure’ is replaced with ‘regionally significant infrastructure’.</p>	<p>e)Establishment of a building platform and access to a building site in an approved subdivision or for a residential building where there is no existing residential building on the property; f)Protection of regionally significant infrastructure from natural hazards; and 2.Earthworks are the minimum required to undertake the activity. Discretion is restricted to: a)Any requirements for landscape evaluation; b.Managing effects on public access and natural character; c.Effects on the values that make the feature Outstanding; d.Extent and design of earthworks; and e.Any physical measures required to mitigate the effects on values that make the feature or area outstanding Activity Status where compliance not achieved: Restricted Discretionary.</p>
<p>Manawa Energy Limited (Manawa Energy) (S438)</p>	S438.100	NFL - R12	Support in part	<p>Manawa generally support the intent of NFL – R12, however consider that the stated matters over which discretion is restricted are overlapping, and do not recognise matters such as functional and optional needs of Renewable Electricity Generation nor public</p>	<p>Amend NFL – R12 as follows: Buildings or Structures and associated Earthworks within an Outstanding Natural Landscape described in Schedule Five or Outstanding Natural Feature described in Schedule Six not meeting Permitted Activity rules or NFL – R10.</p>

				<p>safety considerations. It seeks amendments to these matters of discretion to this effect. A consequential amendment is also required to the rule to address matters raised in the Manawa submission on NFL – R10.</p>	<p>Discretion is restricted to:</p> <ul style="list-style-type: none"> a. Any requirements for landscape evaluation; b. Managing effects on public access and natural character; c. Effects on the values that make the feature Outstanding; d. Extent and design of earthworks; and e. Any physical measures required to mitigate the effects on values that make the feature or area outstanding; f. Any functional or operational needs that relate to the proposal and its location; g. Any matters of public safety.
<p>Manawa Energy Limited (Manawa Energy) (S438)</p>	S438.101	NFL - R14	Support	<p>Manawa supports the activity status afforded to activities subject to this rule.</p>	<p>Retain NFL – R14 as notified.</p>
<p>Manawa Energy Limited (Manawa Energy) (S438)</p>	S438.102	Public Access	Not Stated	<p>Manawa supports the maintenance and enhancement of public access to and along lakes and rivers, however, Manawa seeks that there is recognition of circumstances in which this access is not able to be provided or should be restricted for public safety or the functional and</p>	<p>Add a new policy as follows: To maintain and enhance public access to and along the coastal marine area and waterbodies, while taking into account the need to ensure public safety and maintenance of the operational functional needs of infrastructure.</p>

				operational needs of infrastructure and REG. Manawa notes that the Resource Management Act envisages situations where public access may be closed or restricted to ensure protection and public safety, and also that the primary method for legal acquisition of public access is through subdivision of land.	
Manawa Energy Limited (Manawa Energy) (S438)	S438.103	Overview	Support in part	Manawa notes the overview for this chapter focusses on natural and social values and does not acknowledge the important resource that waterbodies are for the region in terms of providing for hydroelectricity generation. Manawa considers that this should be specifically acknowledged in the overview as it sets the context for some waterbodies and in some cases is the reason that the waterbody exists today (e.g. the artificial reservoirs).	Amend the fifth paragraph of the Overview as follows: Rivers, streams, lakes and wetlands have important ecological, natural character and hydrological values and they provide important habitat for native fish, birds and macroinvertebrate aquatic life. Some waterbodies (both natural and artificial) also form an important resource for the generation of hydroelectricity which contributes to the wellbeing of people and communities.
Manawa Energy Limited (Manawa Energy)	S438.104	NC - O1	Support in part	Manawa requests that reference is added to the ability of effects to be 'avoided, remedied or mitigated' to ensure consistency with terminology used in the Resource Management	Amend NC – O1 as follows: To preserve the natural character of lakes, rivers and wetlands and their margins while providing for appropriate subdivision, use and development where adverse effects can be avoided, remedied or mitigated.

Energy) (S438)				Act, and to recognise this is a valid approach to managing effects.	
Manawa Energy Limited (Manawa Energy) (S438)	S438.105	NC - O3	Support in part	Manawa opposes the use of the term 'minimise' as this is not a commonly used or understood term. It also seeks that the objective is simplified as the effects of activities are dealt with in other policy provisions	Amend NC – O3 as follows: Activities which have a functional or operational need to locate in the margins of lakes, rivers and wetlands are provided for .
Manawa Energy Limited (Manawa Energy) (S438)	S438.106	NC - P1	Support in part	Manawa opposes the use of the term 'minimise' and seeks that this is replaced by terminology used in the Resource Management Act (i.e. 'avoid, remedy or mitigate') or 'manage' which is a term commonly used. It also seeks that the policy is amended to use other correct terminology	Amend NC – P1 as follows: Avoid, remedy or mitigate the adverse effects of activities on the natural character of the riparian margins of lakes, rivers and wetlands by ensuring that subdivision and land use protects the elements, patterns and processes that contribute to the identified natural character values .
Manawa Energy Limited (Manawa Energy) (S438)	S438.107	NC - P2	Support in part	Manawa opposes the use of the term 'minimise' and seeks that this is replaced by terminology used in the Resource Management Act (i.e. 'avoid, remedy or mitigate') and in the effects management hierarchy, or 'manage' which is a term commonly used. It also seeks that the policy is widened to provide for regionally significant infrastructure	Amend NC – P2 as follows Provide for indigenous vegetation removal and earthworks within riparian margins of lakes, rivers and wetlands where significant adverse effects on natural character are avoided, remedied or mitigated and: ... Provide for indigenous vegetation removal and earthworks within riparian margins of lakes, rivers and wetlands where significant adverse effects on natural character are avoided, remedied or mitigated and: ...

				and the establishment, operation or maintenance of renewable electricity generation activities.	<p>b. It is for the maintenance, repair and extension of network utilities and regionally significant infrastructure including the National Grid; or</p> <p>c. it is for the establishment, operation, maintenance or upgrading of renewable electricity generation activities ; or infrastructure where this has a functional or operational need to be located in a riparian margin...</p>
Manawa Energy Limited (Manawa Energy) (S438)	S438.108	NC - P3	Support in part	Manawa supports the general intention of the policy and the recognition of the operational or functional need for many different kinds of buildings and structures to establish in riparian margins. It considers that clause b) should be more specific, and refer to the identified natural character of a riparian area (the intention being that such values would be identified in any assessment of effects accompanying a resource consent application) so that it is clear to all users of the Plan what is intended to be protected,	<p>Amend NC – P3 as follows:</p> <p>Provide for buildings and structures within riparian margins of lakes, rivers and wetlands where these:</p> <p>a. Have a functional or operational need for their location; and</p> <p>b. They are of a form and scale that will not adversely effect the identified natural character of the riparian area.</p>
Manawa Energy Limited	S438.109	NC - P5	Support in part	Manawa operates an extensive range of infrastructure in riparian areas, some of which requires the	<p>Amend NC – P5 as follows:</p> <p>Reduction in public access to waterbodies can be considered when natural hazard mitigation works are</p>

(Manawa Energy) (S438)				exclusion of public access to meet health and safety obligations. It is considered that this should be specifically recognised in this policy.	required to protect communities from a significant natural hazard threat or when required for public safety due to the operational requirements of regionally significant infrastructure . When assessing proposals for natural hazard structures, effects on public access should be considered and ways to minimise them found, including:
Manawa Energy Limited (Manawa Energy) (S438)	S438.110	NC - R1	Support in part	Manawa supports the provision for renewable electricity generation activities within this rule, however considers that the permitted earthworks quantities are unreasonably restrictive and do not adequately provide for the nature of renewable electricity generation activities. Further, these limitations exceed those associated with undertaking similar activities in other overlay areas (such as in outstanding natural landscapes and the high coastal natural character overlay). It seeks that these limits do not apply for Renewable Electricity Generation activities or at least be significantly increased to provide for regionally significant infrastructure activities. Manawa also opposes the activity status associated with activities	Retain provision for infrastructure and renewable electricity generation and existing activities as notified. Amend NC – R1 as follows: Activity Status Permitted 1. Where this is outside of any Significant Natural Area identified in Schedule Four, and for: a) Fence lines; or b) Maintenance, operation, minor upgrade and repair of network utilities, regionally significant infrastructure or renewable electricity generation activities; c) Connections to wastewater, stormwater and reticulated network utility systems; or d) Installation of an environmental monitoring and extreme weather event monitoring facility; or e) Maintenance and repair of lawfully established structures; or f) ... 2. For activities other than those provided for in clause 1 above, the amount of indigenous vegetation clearance is not greater than 20m ² per 200m length of

				<p>where compliance is not achieved. It considers that restricted discretionary activity status is appropriate, with matters of discretion limited to the impacts on the riparian area. It notes that the status of discretionary exceeds that stated for earthworks not complying with permitted rules in other overlay chapters (for example – earthworks not meeting NFL – R6 (which applies to earthworks within an outstanding natural landscape described in schedule Five or Outstanding Natural Feature described in Schedule Six) are a controlled activity.</p>	<p>Riparian Margin; 3. For activities other than those provided for in clause 1 above, Resource Management Act amount of earthworks is not greater than 20m³ per 200m length of Riparian Margin; 4. ...</p> <p>Activity Status where compliance not achieved: Restricted Discretionary</p>
<p>Manawa Energy Limited (Manawa Energy) (S438)</p>	S438.111	NC - R2	Support in part	<p>Manawa supports the specific recognition of buildings and structures which are renewable electricity generation facilities as permitted activities in the riparian margin of a river, lake or wetland where these have a functional need to locate within a riparian margin. However it considers that recognition should also be made of the operational need for such buildings to locate in these areas.</p>	<p>Amend NC – R2 (f) as follows: f. Renewable electricity generation facilities where these have a functional or operational need to locate within the riparian margin;</p>

Manawa Energy Limited (Manawa Energy) (S438)	S438.112	Natural Character and the Margins of Waterbodies Rules	Not Stated	To ensure consistency with the relief sought in NC – R1, Manawa requests that a new rule is added.	Add a new rule NC – RX as follows: Earthworks not meeting Permitted Activity Rule NC – R1 Activity Status Restricted Discretionary Discretion is restricted to: a) The location of any earthworks and indigenous vegetation clearance; b) Volume and area of earthworks and indigenous vegetation clearance; c) The effects on potential or existing public access to the riparian margin; d) Effects on habitats of any threatened or protected flora or fauna species; e) Effects on recreational values of public land; f) Effects on Poutini Ngāi Tahu values and any Sites and Areas of Significance to Māori identified in Schedule Three; and g) Landscape and visual effects.
Manawa Energy Limited (Manawa Energy) (S438)	S438.113	FC	Oppose	Manawa considers that the structure and content of this chapter as it relates to landuse activities is inappropriate and does not provide clarity or certainty for users of the Plan. The Financial Contribution provisions sit under the subdivision chapter heading, means that many people would not find these provisions easily and it is not obvious	Remove the Financial Contribution provisions from the Subdivision Chapter, and include these in a new, clearly identifiable chapter. OR If a decision is made to retain these provisions in the Plan, amend the chapter heading to ‘Financial Contributions – Subdivision and Landuse ’.

				that they are intended to apply to landuse activities beyond subdivision. Manawa considers that if a decision is made to retain the financial contribution provisions of the Plan these are clearly separated from the subdivision provisions.	
Manawa Energy Limited (Manawa Energy) (S438)	S438.114	FC	Oppose	Manawa notes the stated intent to explore a move away from financial contributions to Development Contributions under the LGA and supports this approach. In noting the expressed need for this chapter in the interim, Manawa considers it important that the overview clearly set out that financial contributions are acknowledged as only one way to deal with infrastructure provision and only one method of managing adverse effects of activities. As presently drafted, it could be read as this being the fallback position for management of effects. Manawa strongly opposes the financial contributions proposed for the management of adverse effects on landuse consents, and does not consider that these are transparent,	Delete all pTTPP provisions relating to the taking of financial contributions on landuse consents for management of effects, including (but not limited to): FC-O1 (part) FC-O2 FC-P1 (part) FC-P2 (part) FC-P6 FC-P7 FC-R1 (part) FC-R2 (part) FC-R12. In the alternative, amend all of the provisions listed above in order to: <ul style="list-style-type: none"> clearly state the purpose of contributions, and whether these are intended to apply to offsetting and/or compensation (or only the latter as indicated in Rule FC – R1(1)). clearly set out the relationship between the various sections of the Plan, particularly the principles established in ECO P9 and the relationship to FC – R12. state how and when contributions will be applied

			<p>fair, equitable or meet the requirements of Section 32 of the Resource Management Act 1991. Manawa acknowledges that under the provisions of Section 108 of the Resource Management Act 1991 financial contributions are able to be applied to offset or compensate residual adverse effects. However, Manawa has strong concerns regarding the manner in which this regime is proposed to be established, the transparency of such and the workability of the provisions outlined in the pTTPP. Section 108 (10) prescribes that a consent authority must not include a condition requiring a financial contribution unless (a) The condition is imposed in accordance with the purposes specified in the plan or proposed plan (including the purpose of ensuring positive effects on the environment to offset any adverse effect); and (b) The level of contribution is determined in the manner described in the plan or proposed plan. Manawa considers</p>	<p>(i.e. if financial contributions are to be collected to offset or compensate for residual adverse effects then the money or land should be used to fulfil that purpose).</p> <ul style="list-style-type: none"> • explain the nature of the contribution – noting that Section 108 of the Resource Management Act prescribes those financial contributions can be taken for money or land only. • provide a clear methodology for how such a contribution will be calculated, over which period of time, and who is responsible for such a calculation. • explain how the various Councils administering the Plan will implement these provisions in a cohesive, coordinated and transparent manner, and deal with any cross boundary matters (including projects or associated effects or offsetting/ compensation) that transcend local authority boundaries.
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			<p>that the pTTPP does not include enough specificity about how the level of contributions will be set, the use of such contributions, and how these will be applied to proposals. Manawa also has a concern that financial contributions may be imposed for adverse effects which are addressed in other ways (such as mitigation) – essentially leading to duplication or double dipping. It also queries the ability to financially offset or compensate for residual adverse environmental effects on values such as ONLs, and how the contributions regime will work in conjunction with the natural features and landscapes provisions, which set up a different effects management framework to the indigenous biodiversity provisions. At a more general level, Manawa also opposes the use of terminology which is inconsistent with higher level policy documents – in particular the requirement in FC – P6 that such conditions will be used to manage adverse effects where these</p>	
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			<p>cannot be avoided, remedied or mitigated; inconsistent use of terminology applying to significant indigenous biodiversity / significant indigenous vegetation or areas of significant habitat of indigenous fauna. For the above reasons Manawa seeks that the provisions relating to the imposition of financial contributions for the purpose of managing adverse environmental effects are deleted from the Plan. If a decision is made to pursue the incorporation of these provisions, Manawa requests that these be amended substantially to:</p> <ul style="list-style-type: none">• clearly state the purpose of contributions, and whether these are intended to apply to offsetting and/or compensation (or only the latter as indicated in Rule FC – R1(1)).• clearly set out the relationship between the various sections of the Plan, particularly the principles established in ECO P9 and the relationship to FC – R12.• state how and when contributions will be applied (i.e. if financial contributions	
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			<p>are to be collected to offset or compensate for residual adverse effects then the money or land should be used to fulfil that purpose).• explain the nature of the contribution – noting that Section 108 of the Resource Management Act prescribes those financial contributions can be taken for money or land only. • provide a clear methodology for how such a contribution will be calculated, over which period of time, and who is responsible for such a calculation. • explain how the various Councils administering the Plan will implement these provisions in a cohesive, co ordinated and transparent manner, and deal with any cross boundary matters (including projects or associated effects or offsetting/ compensation) that transcend local authority boundaries. Manawa also wishes to be specifically consulted on any such amended provisions and reserves the right to comment on these. It also notes that the Councils may be</p>	
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			<p>required to alter the District Plan to align with the principles of the yet to be released National Policy Statement on Indigenous Biodiversity. Manawa also reserves the right to be involved and comment on any such changes to the Plan as a result of notification of this statement. Manawa has sought amendments to other provisions of the Plan relating to financial contributions (beyond those relating to landuse) as outlined in the detailed submission points. It is recommended that all aspects of this section that relate to landuse activities (other than subdivision) and the management of effects, be reconsidered such that financial contributions are not relied on as the method of managing adverse effects on the environment. The way in which these provisions are currently worded is misleading, implying that adverse effects can be paid for rather than dealt with through the effects management hierarchy. If it is decided to continue to incorporate</p>	
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				<p>aspects of effects management in these provisions, then it needs to be amended to clearly state that it is only one option, and there needs to be clarity in the use of terminology used (e.g. offsetting is a term used in relation to biodiversity and not applicable to other effects). The chapter uses 'offsetting', 'compensation' and 'mitigation' interchangeably and this is confusing and inappropriate. Manawa's recommended approach is the removal of all aspects of this chapter relating to managing adverse effects. It considers that if the pTTPP wishes to utilise financial contributions to deal with the management of adverse effects then a plan change or variation to the Plan should be notified.</p>	
<p>Manawa Energy Limited (Manawa Energy) (S438)</p>	S438.115	FC - O2	Oppose	<p>As per earlier comments Manawa do not consider that financial contributions should be used as the sole mechanism to ensure that subdivision, land use and development does not adversely</p>	<p>Delete FC – O2 OR Amend FC – O2 as follows To ensure that new activities and development contributes fairly and equitably towards the costs of managing adverse effects on the environment of the West Coast/Te Tai o Poutini.</p>

				affect natural and physical resources.	
Manawa Energy Limited (Manawa Energy) (S438)	S438.116	FC - P2	Oppose	As per earlier comments Manawa do not consider that financial contributions should be used as the sole mechanism to ensure that subdivision, land use and development does not adversely affect natural and physical resources. It considers that the policy should be amended to ensure that any financial contributions taken are also reasonable and appropriate to the circumstances, and that any financial benefits (such as interest) associated with the taking, holding and allocating of financial contributions are also taken into account.	Amend FC – P2 as follows: Financial contributions shall be applied in a fair and equitable manner that: a)Is financially transparent, reasonable and appropriate to the circumstances; b)Reflects the adverse effects and demand on services and facilities generated by the subdivision, land use or development; c)Is complementary to the Council’s other financial management policies; and d)Takes into account any costs incurred and financial benefits associated with the taking, holding and allocating the financial contributions.
Manawa Energy Limited (Manawa Energy) (S438)	S438.117	FC - P6	Oppose	As per earlier comments Manawa seek that this policy be deleted, or otherwise amended to be clearly directed to management of effects not to offsetting or compensation, and to identify that financial contributions are only one method of managing adverse environmental effects.	Delete FC – P6 OR Amend FC – P6 as follows: To provide for the use of financial contributions as a method of managing adverse environmental effects where these cannot practically be avoided, remedied or mitigated, and recognise that some activities have specific functional and operational needs such as mineral extraction,

					renewable electricity generation activities and regionally significant infrastructure.
Manawa Energy Limited (Manawa Energy) (S438)	S438.118	FC - P7	Support in part	Manawa is generally supportive of the specific recognition of the local, regional and national benefits of the proposed activity when calculating financial contributions, noting the issues raised above. However it considers that this should be taken further and that clear formulas / methods of calculation be included in the Plan. In the interim, this policy should be deleted as inadequate to meet the requirements of the Resource Management Act.	Delete FC – P7
Manawa Energy Limited (Manawa Energy) (S438)	S438.119	FC - R12	Oppose	As per earlier comments Manawa seek that this rule be deleted.	Delete FC – R12
Manawa Energy Limited (Manawa Energy) (S438)	S438.120	SUB - P6	Support in part	Manawa generally supports the inclusion of provisions dealing with the potential reverse sensitivity effects of subdivision (and associated activities), however requests that these provisions also	Amend SUB – P6 Avoid subdivision: In the RURZ – Rural Zones that could result in the creation of an unplanned new settlement; In the Earthquake Hazard Overlay that could result in the creation of new allotments; Where detached minor residential units in RURZ –

				take into account Renewable Electricity Generation areas and facilities (in accordance with the provisions of the NPS – REG). To ensure that consistent terminology is used throughout the pTTPP Manawa requests that the term ‘energy activities’ be replaced with ‘renewable electricity generation activities’.	Rural Zones become legally separated from the main residential unit thereby creating cumulative effects on rural character and productivity; Where this could create significant reverse sensitivity issues in relation to the MINZ – Mineral Extraction Zone or Renewable Electricity Generation Activities; ...
Manawa Energy Limited (Manawa Energy) (S438)	S438.121	EW - R2	Not Stated	Earthworks are a critical component of the number of repair, maintenance, operation, upgrading and establishment of renewable electricity generation activities undertaken by Manawa. The earthworks chapter is the primary control over the activity of earthworks across the region, and accordingly Manawa requests that specific provision is made for activities that it undertakes.	Amend EW – R2(d) as follows: Where: 1. All standards in Rule EW – R1 are complied with; and 2. These earthworks are: a) ... b) c) ... d) These are earthworks including stockpiles required for repair, maintenance, operation, upgrading and establishment of network utility or regionally significant infrastructure ; or e) ...
Manawa Energy Limited (Manawa	S438.122	EW - R3	Oppose	Manawa considers that the pTTPP contains excessive and overlapping requirements relating to earthworks – particularly as these apply to renewable electricity generation and	Amend EW – R3 as follows: Activity Status Permitted Where: 1. All standards in Rule EW – R1 are complied with; and

<p>Energy) (S438)</p>				<p>regionally significant infrastructure activities. It considers that any sufficient controls relating to earthworks are either covered by the ENG chapter or Rule EW – R2, and that compliance with the overlay chapters is excessive and unjustified, or in the alternative the requirements in the overlay chapters override those in the earthworks chapter rather than all the rules being cumulative. To ensure that consistent terminology is used throughout the pTTPP Manawa requests that the term ‘community infrastructure’ (which it notes is not defined in the pTTPP) be replaced with ‘regionally significant infrastructure’.</p>	<p>2. These are ancillary earthworks for: i. A Permitted Activity, except that in the Rural Lifestyle Zone a maximum of 500m²/site of land is disturbed in any 12 month period; or ii. An Energy Renewable Electricity Generation Activity, Regionally Significant Infrastructure, Network Utility Operation or Transport Activity, 3. Where the earthworks (other than those provided for in clause 2 above) are undertaken within an Overlay Chapter area these earthworks meet the Permitted Activity standards for the relevant Overlay chapter.</p>
<p>Manawa Energy Limited (Manawa Energy) (S438)</p>	<p>S438.123</p>	<p>EW - R8</p>	<p>Not Stated</p>	<p>Manawa seeks that the matters of which discretion is limited are excessive and include duplication. It seeks that changes are made to provide greater certainty to applicants and to provide clarity over the extent to which effects are relevant and can be considered.</p>	<p>Amend EW – R8 as follows: Discretion is restricted to: a. The impact of the earthworks on visual amenity, landscape character, outlook and privacy; b. Potential dust nuisance, sedimentation, land instability, contamination and erosion effects on surrounding land uses; c. Effects that result from the stockpiling in terms of visual amenity, landscape context and character, views,</p>

					<p>outlook, overlooking and privacy; d. The effectiveness of proposed management or mitigation measures to minimise any potential adverse effects beyond the property boundary of the activity;</p> <p>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 the water table;</p> <p>f. The impact of earthworks on regionally significant infrastructure;</p> <p>g. The impact on the road network, of heavy vehicle and other vehicular traffic generated as a result of earthworks;</p> <p>h. Any adverse effects on landscape, amenity, natural features, water quality, cultural and heritage sites, biodiversity and habitat of indigenous flora and fauna, and the quality of the environment;</p> <p>i. The impact on stormwater infrastructure and any overland flow paths; and</p> <p>j. The impact on any natural hazards infrastructure and the effectiveness of its operation.</p>
Manawa Energy Limited (Manawa Energy) (S438)	S438.124	NOISE - O2	Support in part	Manawa requests that the pTTPP provide for the continued operation of Manawa assets in various locations throughout the West Coast. This includes the operation of power stations and associated infrastructure within the Rural,	<p>Amend NOISE – O2 as follows:</p> <p>The function and operation of existing and permitted future noise generating activities and regionally significant infrastructure are not compromised by adverse effects, including reverse sensitivity effects, from noise-sensitive activities.</p>

				Natural Open Space and Open Space zones. It requests that these standards are reviewed to ensure that Manawa can continue to operate its assets in an efficient manner. To ensure that consistent terminology is used throughout the pTTPP Manawa requests that the term 'community infrastructure' (which it notes is not defined in the Plan) be replaced with 'regionally significant infrastructure'.	
Manawa Energy Limited (Manawa Energy) (S438)	S438.125	NOISE - P1	Support in part	Manawa supports the general intent of this policy, however to ensure that consistent terminology is used throughout the pTTPP Manawa requests that the term 'community infrastructure' (which it notes is not defined in the pTTPP) be replaced with 'regionally significant infrastructure'.	Amend NOISE – P1 as follows: Enable the generation of noise when it is of a type, character, scale and level that is appropriate to the zone, having regard to: The purpose, character and qualities of the zone that the activity is located in; The nature, frequency and duration of the noise generating activity; Whether the noise generating activity is regionally significant infrastructure; ...
Manawa Energy Limited (Manawa Energy) (S438)	S438.126	NOISE - R2	Support in part	Manawa supports the general intent of this rule, however to ensure that consistent terminology is used throughout the pTTPP Manawa requests that the term 'lifeline	Amend NOISE – R2(5) as follows: 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

Energy) (S438)				utilities’ be replaced with ‘regionally significant infrastructure’.	services or providers of regionally significant infrastructure.
Manawa Energy Limited (Manawa Energy) (S438)	S438.127	ZONES	Support	Manawa generally support the approach taken in the TPPP that Renewable Electricity Generation activities are adequately and appropriately provided for by the rules in the ENG chapter, such that the rules in all zone chapters should not apply to Renewable Electricity Generation activities. However, depending on the status of such activities and the area in which they are located the objectives and policies for specific zones may be applicable. In addition, the background overview for each zone may be used in interpreting such policy provisions. Accordingly, Manawa considers that the relevant zone descriptions and associated objectives and policies should specifically acknowledge the existence of and provide for renewable electricity generation activities / regionally significant infrastructure. Manawa has	Retain clarification provided within each of the zone provisions that these do not apply to renewable electricity generation / regionally significant infrastructure activities covered by the ENG and specific overlay chapters – subject to detailed comments provided below.

				commented on specific zone related provisions of the Plan to this effect.	
Manawa Energy Limited (Manawa Energy) (S438)	S438.128	Overview	Support in part	Many of the Manawa assets are located in (or partly within) the Open Space Zone, however the overview does not make any reference to renewable hydro electricity generation activities as a key activity existing in these areas. Manawa considers that Renewable Electricity Generation assets should be specifically recognised within this zone to acknowledge that they are existing and longstanding modifications to these areas and provide a significant resource for the Region. This also acts to recognise these existing schemes such that there is no unreasonable assumption that these zones are unmodified.	Add the following to the end of the first paragraph in the Overview: A number of renewable electricity generation activities are located within this zone and these activities provide a crucial role in ensuring provision of electricity supply to the West Coast and are recognised as regionally significant assets.
Manawa Energy Limited (Manawa Energy) (S438)	S438.129	OSRZ - O1	Support in part	Manawa considers that this is a very broad objective and provides little direction on what is the intent for these zones at a high level. As currently worded the objective would be very difficult to interpret consistently and apply to specific proposals. What are the “values of	Rearrange the objectives such that objective 2 comes first to set out the types and uses of open space areas. Amend OSRZ – O1 (and move it to be the second objective) as follows: Development and activities should complement, and not conflict with, the functions and values of open space areas and the surrounding environment.

				<p>the particular open space” and how can these be consistently understood. It also does not recognise that there needs to be opportunities for new activities to establish, where they are beneficial, where this may not be consistent with the existing surrounding environment. Manawa recommends that this objective be reconsidered and reframed to provide clarity and direction without unreasonably restricting uses of these large areas of land. It is important to note also that not all land in this zone is publicly owned as many areas zoned as open space are private land such as Manawa land associated with hydro-electric power schemes.</p>	
<p>Manawa Energy Limited (Manawa Energy) (S438)</p>	S438.130	OSRZ - P2	Support in part		<p>Amend OSRZ – P2 as follows: Open space may accommodate regionally significant infrastructure activities, recreational, cultural, natural, heritage, access and amenity values and functions and ancillary activities to support these, where this fits with the purpose of the open space and its classification under any relevant Act or has a functional or operational need for such a location.</p>

Manawa Energy Limited (Manawa Energy) (S438)	S438.131	OSRZ - P3	Support in part		Amend OSRZ – P3 as follows Buildings and structures should be designed and sited to be compatible with the function and predominant purpose of the open space, where practicable , and fit within the character and amenity of the surrounding area.
Manawa Energy Limited (Manawa Energy) (S438)	S438.132	OSRZ - P9	Support in part		Amend OSRZ – P9 as follows: Provide for the range of purposes where compatible with the open space values including: <ol style="list-style-type: none"> a. The ongoing operation and appropriate management of cemeteries; b. Camping opportunities at rivers, lakes and coastal areas where this is compatible with the values of the open space; c. Gravel and shingle extraction for roading networks and other local purposes; Quarries for rock; d. Pastoral farming including grazing as a management tool; f. Mineral extraction of resources where these are limited in their location; g. Establishment and operation of regionally significant infrastructure; and h. Water supply and drainage networks where this supports local community needs.
Manawa Energy Limited	S438.133	OSRZ - P13	Support in part		Amend OSRZ – P13 as follows: Provide for activities that are ancillary to the functions of the OSZ – Open Space Zone including:

(Manawa Energy) (S438)					<p>a. Retail activities; b. Residential activities, including for caretaker purposes; c. Agricultural, horticultural or pastoral activities; and d. Establishment and operation of regionally significant infrastructure.</p>
Manawa Energy Limited (Manawa Energy) (S438)	S438.134	Overview	Support in part	<p>Manawa request that comments are included in the overview acknowledging the existence of Renewable Electricity Generation facilities within this zone, and the value of this resource throughout the Region.</p>	<p>Add the following to the end of the third paragraph of the Overview: Additionally, a number of renewable electricity generation activities are located within this zone and these activities provide a crucial role in ensuring provision of electricity supply to the West Coast, and are recognised as regionally significant assets.</p>
Manawa Energy Limited (Manawa Energy) (S438)	S438.135	OSZ - Open Space Zone Rules	Support in part	<p>Manawa request that comments are included in the section clarifying that the rules in this section do not apply to energy activities and renewable electricity generation activities.</p>	<p>Add the following to OSZ – Open Space Zone Rules: The ENG chapter contains rules applying to energy activities and renewable electricity generation activities throughout the district, and accordingly the rules in this chapter do not apply to these activities.</p>
Manawa Energy Limited (Manawa Energy) (S438)	S438.136	Overview	Support in part	<p>Manawa supports the general reference to the location of energy generation sites within the Rural zone. However, the “Key points to note” section does not make specific reference to the role of Renewable Electricity Generation or infrastructure in general, despite the</p>	<p>Retain reference to renewable electricity generation within the Overview, as notified. Amend the paragraph titled ‘Key points to note’ by adding an additional bullet point as follows: Regionally significant infrastructure, and renewable electricity generation activities are provided for in the strategic directions around connections and resilience and are necessary activities within Rural zones.</p>

				inclusion of these matters in the strategic objectives for the District in relation to Connections and Resilience. Manawa requests that specific reference is made to these in the “Key points to note”.	
Manawa Energy Limited (Manawa Energy) (S438)	S438.137	RURZ - P6	Support	Manawa supports the recognition of non rural activities within the rural zone and seeks explicit recognition of regionally significant infrastructure as important within the zone.	Amend RURZ – P6 as follows: Recognise that the rural areas may be the most appropriate location for some utility, regionally significant infrastructure , industrial or commercial uses to establish, where these have a functional relationship with rural areas or a functional or operational need to locate in that area , provided the character and amenity of the rural areas is maintained and adverse effects are managed.
Manawa Energy Limited (Manawa Energy) (S438)	S438.138	RURZ - P15	Support	Manawa supports the recognition of the potential for reverse sensitivity effects on consented activities and existing rural uses within the rural zone.	Retain RURZ – P15 as notified.
Manawa Energy Limited (Manawa Energy) (S438)	S438.139	RURZ - P16	Support in part	Manawa supports the recognition of the potential for reverse sensitivity effects within the rural zone, and the establishment of buffers around such infrastructure activities to protect them from such uses. It requests that renewable electricity	Amend RURZ – P16 as follows: There should be sufficient buffers provided from infrastructure such as wastewater treatment plants and land disposal areas, renewable electricity generation activities , transmission and other regionally significant infrastructure and water supply

				generation activities/ regionally significant infrastructure is specifically included as an activity for which a buffer will be provided.	catchments to avoid reverse sensitivity effects on the infrastructure.
Manawa Energy Limited (Manawa Energy) (S438)	S438.140	Overview	Support in part	Unlike the general overview section in the umbrella rural zone section, the specific overview for the General Rural zone does not mention the existing Renewable Electricity Generation activities at all. Manawa seeks that appropriate recognition of Renewable Electricity Generation activities and regionally significant infrastructure is provided in this overview. To ensure consistency within the pTTPP Manawa seeks that the term 'critical infrastructure' is replaced with 'regionally significant infrastructure'.	Amend the Overview as follows: The GRUZ – General Rural Zone is the largest zone ... The GRZ – General Rural Zone provides for primary production, such as pastoral farming, livestock, horticulture and forestry. It also provides for resource extraction such as quarrying and mining, regionally significant infrastructure , and intensive indoor farming, such as indoor poultry and pig farms. These activities have the potential to generate adverse activities beyond the boundaries of a site, for example: noises from farm animals and farm machinery, odour from dairy-sheds and associated effluent treatment and discharge systems, silage/baleage and agricultural fertiliser, light overspill, and traffic effects from milk tankers, aggregate trucks and stock trucks. The effects of rural production activities therefore need to be appropriately managed and mitigated, while recognising that the GRUZ – General Rural Zone is a production-oriented working environment that is characterised by these activities. The GRZ – General Rural Zone is also characterised by an open, vegetated landscape that is interspersed with low density buildings and structures that are predominantly used for rural activities, such as barns

					<p>and sheds, or larger, more numerous buildings of industrial scale and appearance used for intensive primary production or rural industry. A number of renewable electricity generation activities are located within this zone and these activities provide a crucial role in ensuring provision of electricity supply to the West Coast and are recognised as regionally significant assets. Rural halls, domains and schools which serve the needs of the rural community are also present however there is a general lack of urban infrastructure in the zone such as street lighting and footpaths. Te Tai o Poutini Plan seeks to maintain this rural character.</p> <p>Where numerous or larger scale buildings or structures are proposed, their location, height and scale are managed to ensure development does not compromise the qualities of the rural setting or rural character. A range of structures associated with regionally significant infrastructure are also a feature of the rural areas. ...</p>
Manawa Energy Limited (Manawa Energy) (S438)	S438.141	General Rural Zone	Support in part	<p>Manawa seeks that the notes section of this chapter is amended to clarify that the provisions of this chapter do not apply to ENG activities. This amendment is consistent with the structure of other chapters of the pTTPP.</p>	<p>Amend General Rural Zone Rules: Note by adding the following sentence: The ENG chapter contains rules applying to energy activities and renewable electricity generation activities throughout the district, and accordingly the rules in this chapter do not apply to these activities.</p>

<p>Manawa Energy Limited (Manawa Energy) (S438)</p>	<p>S438.142</p>	<p>SCHED5 - SCHEDULE OF OUTSTANDING NATURAL LANDSCAPES</p>	<p>Oppose</p>	<p>Manawa has significant concerns regarding the approach taken to identification and protection of outstanding natural features and landscapes. The approach does not appear to be robust or based on current best practice in undertaking such work for a District Plan. Manawa considers that the methodology used for the Landscape Study is flawed. This flawed methodology has resulted in substantial errors in the mapping and identification of landscapes within the pTTPP. The methodology utilised has not appropriately articulated descriptions and characterisations of landscape generally (only outstanding landscapes), nor has it provided the identification of values within each of the ONFL, identification of existing activities and modifications within the ONFL. These flaws also lead to inaccuracies of mapping of ONFL areas as this has been done inaccurately and at an inappropriate scale. Without clearly identifying the</p>	<p>Review and amend the entire landscape study methodology and outputs to follow best practice and to include the necessary assessment against national guidance.</p> <p>Review and amend the entire landscape study to include full assessment of the landscape generally, the values of ONFL and the existing activities / modification within ONFL.</p> <p>Review and amend the mapping of the ONFL areas to accurately map these at an appropriate scale that can be applied at a site level, and to include review of all areas where the mapping follows arbitrary lines and not landform or landcover.</p> <p>Review and amend all of the landscape schedules to include a description of the values that make each ONFL outstanding, and to include a description of the existing activities / modification within each of the ONFL areas.</p> <p>Specifically review and amend Schedule 5 in relation to ONL 15, ONL 16, ONL 25 and ONL 27 to provide a recognition of the existing renewable electricity generation activities.</p> <p>Review and amend the entire landscape study methodology and outputs to follow best practice and to include the necessary assessment against national guidance including review of all of the ONFL mapping to improve accuracy and appropriate identification of</p>
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			<p>values and characterisations of all landscape areas – rather than jumping straight to outstanding areas – the landscape assessment does not accurately consider the landscape values of the wider region. This is not best practice. The lack of description of the values within each of the ONFL means that there is no clear understanding of what makes these areas special. This means that there is no ability to judge changes to an area accurately and the basis for assessment is flawed. The policy approach is to manage effects on values but this is impossible if there is not articulation of what the values are. Similarly, the assessment of capacity to absorb change, significance of effects and the like cannot be undertaken without a consistent understanding of what exists presently. The lack of description of the existing activities/modification within each of the ONFL means that there is no accuracy in the base understanding of areas. Not articulating the existing</p>	<p>areas.</p> <p>Review and amend the mapping of the ONFL areas to accurately map these at an appropriate scale that can be applied at a site level, and to include review of all areas where the mapping follows arbitrary lines and not landform or landcover.</p> <p>Specifically review and amend map overlays applying to ONL 15, ONL 16, ONL 25 and ONL 27 generally to better follow landform and landcover, and specifically as follows:</p> <ul style="list-style-type: none"> • ONL15: Koihaihai/ Gillespies Point to Te Kohumarua Bluff: refine the ONL mapping around the eastern part of Lake Wahapo and the surrounding landforms, including the relationship with the Waitangitahuna River. • ONL25: Lake Kaniere: review the extent around the highly natural Kennedy Creek and its margins, the modified area of forestry around Blue Bottle Road to the south of the Kaniere Forks power station, the ‘cut-outs’ at Lake Kaniere and the inclusion of a large adjacent area of native bush along the ONL’s north-western edges (near Blue Bottle Creek). • ONL27: Lower Taramakau River & Kawhaka Forest: reconsider the extent of inclusion of the Taramakau River; reconsider the extent of this ONL to the west, around the extensive wetland areas; to the north around Dillmanstown, Greenstone River/ Hokonui; and the margins of the Kumara Reservoir. A review of the
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				<p>(and in some cases substantial) modification implies that these areas are pristine and that is unreasonable. There are many important activities in the ONFL areas such as state highways, renewable electricity generation activities, transmission structures, and other regionally significant infrastructure. These are existing in the ONFL and need to be recognised as being a part of the landscape. As set out above, Manawa considers that the landscape study is flawed and as such the ONFL overlays shown on the maps are inaccurate and do not appropriately capture landscape values. The mapping of ONFL areas has been done at a scale that does not allow the areas to be properly understood on the ground and at a site level. Further the mapping follows arbitrary lines and does not appropriately follow landform or landcover.</p>	<p>ONL in relation to the Kapitia Reservoir is also required, notably along its northern boundary.</p>
<p>Manawa Energy Limited</p>	<p>S438.143</p>	<p>Whole plan</p>	<p>Not Stated</p>		<p>All necessary and consequential amendments to other parts of the pTTPP are also sought where they relate to submission points set out above.</p>

(Manawa Energy) (S438)					
Mandy Deans (S549)	S549.001	SASM 1	Oppose	major concerns regarding the Arawhata Pa Site SASM208	Further consultation with Neils Beach Community
Margaret Montgomery (S446)	S446.001	Poutini Ngāi Tahu	Support		Retain as notified.
Margaret Montgomery (S446)	S446.002	Natural Hazards Rules	Support in part	The focus has been on environmental quality while stifling development opportunities for communities, with several smaller communities which have adapted in response to the environment are now including provisions which would inhibit future growth, due to flood zoning. With non-complying activities in theory consent can be sought, however this is at the discretion of the local council and employees.	Amend Non-complying Activity rules for flooding to Restricted Discretionary
Margaret Montgomery (S446)	S446.003	Whole plan	Amend	The environmental focus throughout the plan is a behemoth large portions of land are either owned by Ngai Tahu forest, DOC or some form of crown entity, with very little undeveloped land held in private	The relevant rules across the natural environment chapters should be amended to restricted discretionary to allow for relevant rules to focus on the specific matters, while allowing private land owners the chance to apply for resource consent where appropriate.

				ownership. The above entities have a crown duty to protect this land and the council intervention in private ownership of land particularly with regard to vegetation clearance, and use of land is considered egregious. T	
Margaret Montgomery (S446)	S446.004	STRATEGIC DIRECTION	Support		I support fostering the use and development of natural and physical resources whilst protecting the natural values 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;
Margaret Montgomery (S446)	S446.005	STRATEGIC DIRECTION	Support	Support direction of providing a prosperous economy through enabling a wide range of appropriate business activities	Retain provisions that support providing a prosperous economy through enabling a wide range of appropriate business activities
Margaret Montgomery (S446)	S446.006	Infrastructure Objectives	Support	Support the operation and maintenance of critical infrastructure;	Retain provisions that allow for the operation and maintenance of critical infrastructure.
Margaret Montgomery (S446)	S446.007	UFD - O1	Support	Support the management of urban growth integrating existing and future infrastructure, providing sufficient land, or opportunity to meet growth demands for housing and business.	Retain the approach.

Margaret Montgomery (S446)	S446.008	Contaminated Land	Support		Retain the provisions
Margaret Montgomery (S446)	S446.009	Hazardous Substances	Amend	The rule does not reference the HSNO Act outside of the blurb, consideration should be given to amending the writing so that the plan includes a direct reference to this standard.	Amend provisions to directly refer to the HSNO Act.
Margaret Montgomery (S446)	S446.010	NHP1	Support	Support the approach of identifying hazard areas in overlays.	Retain approach of identifying hazard areas in overlays.
Margaret Montgomery (S446)	S446.011	NHP2	Oppose	Council should proceed with calculations and natural hazard identification to fully address the areas of concern, not proceed based on a guess based approach. Further this should be quantified. The current policy puts this on developers to disprove.	Oppose a precautionary approach.
Margaret Montgomery (S446)	S446.012	NHP3	Oppose	Hard engineering solutions are still appropriate measures in addressing natural hazards with often greater success than natural solutions, and where not resulting in adverse effects upon the neighbours would be appropriate,	The wording of this policy should be changed to reflect that the whole of New Zealand is a hazard prone country due to the ocean locked nature and therefore consideration in development, should consider engineering solutions (general) that mitigate risk.

Margaret Montgomery (S446)	S446.013	NHP4	Oppose	Council should have this information and it should not be upon the applicant to provide analysis that the development or future activity is able to meet this policy, particularly when a number of matters are under scientific dispute with regard to the potential intensity. The policy is considered to restrictive when considering the coastal environment of the West Coast, as this would inhibit development.	Delete the policy.
Margaret Montgomery (S446)	S446.014	NHP5	Oppose	Managed retreat is to be informed by the upcoming rework of the RMA and at this time there are no provisions for managed retreat under the RMA. While it is acknowledged that development could be at risk, it should be at the discretion of the land owner as to withdrawing from these areas and the plan should be informed by higher level planning documents.	Delete or significantly amend the policy to reflect submitter concerns.
Margaret Montgomery (S446)	S446.015	NHP6	Support	I agree in full.	Retain the policy.

Margaret Montgomery (S446)	S446.016	NHP7	Support	Agree in full	Retain the policy.
Margaret Montgomery (S446)	S446.017	NHP8	Support	Agree in full.	Retain the policy.
Margaret Montgomery (S446)	S446.018	NHP9	Oppose	The above policies allow for buildings and residential buildings within close proximity to fault lines, which would be required for a lake tsunami and therefore a similar level standard should be adopted, I doubt after a high level magnitude earthquake, the concern would be around having wet feet.	Amend the policy so that Lake Tsunami have a similar standard to that of Earthquake Hazards and Coastal Tsunami.
Margaret Montgomery (S446)	S446.019	NHP10	Oppose	Policy aspect b is too restrictive and is based on a significant public or environmental benefit while the majority of land which can be developed is held in private ownership, this policy essentially restricts all development outside of council initiated development.	this should be amended so that where an activity incorporates mitigation to risk to life, the development is appropriate.
Margaret Montgomery (S446)	S446.020	Westport Hazard Overlay	Oppose	Restricted discretionary provisions should also be included to this effect, particularly in consideration of development in Westport, in	Amend Discretionary Activities to be Restricted Discretionary.

				which the majority of the town has been zoned to prevent future development after a 1 in 60 year flood, considering that houses can be raised and development in other parts of the country do not have rules that are this intense (refer to south Dunedin, Lower Hutt etc.)	
Margaret Montgomery (S446)	S446.021	NHP11	Support		A note can be included which identifies some form of mitigation measures.
Margaret Montgomery (S446)	S446.022	NHP13	Oppose in part	Council should be required to provide specific floor height measurements as determined by the datum or have some form of online reference – the rule is not supported by current determination in the plan or through a council provided service to my knowledge. This is at undue cost to the applicant. I also disagree where the 1m sea level rise coastal event is based on. As well as the use of avoided, as mitigation measures are further possible e.g. two storey dwellings with conditions around what can go in the bottom story – e.g. garage/storage no areas. The	Amend policy to place more responsibility on the Council providing the necessary information, to remove the reference to the 1m sea level rise coastal event and delete the word avoid.

				use of the word avoid gives little flexibility for real world practice.	
Margaret Montgomery (S446)	S446.023	Natural Hazards Rules	Amend	The rules are vague and offer very little insight for either practitioners or developers. The open ended nature of these standards should be addressed in depth and rules should be given set value restrictions. Please use reference material from councils which have undergone a plan change, particularly in reference to rules which address urban environments.	Amend the rules to be clearer and more prescriptive with reference to standards in depth and set value restrictions.
Margaret Montgomery (S446)	S446.024	NHR1	Support	This is an extension of s.10 of the RMA which is more permissive.	Retain as notified.
Margaret Montgomery (S446)	S446.025	NHR2	Support	Agree in full.	Retain as notified.
Margaret Montgomery (S446)	S446.026	NHR3	Support	Agree in full	Retain as notified.
Margaret Montgomery (S446)	S446.027	NHR4	Support	Agree in full	Retain as notified.

Margaret Montgomery (S446)	S446.028	NHR6	Oppose in part	The use of the word sensitive activities within this rule is not linked to the definition, particularly when the definition basically includes the majority of activities that would be located in existing residential townships, particularly where the failure is non-complying the provision is too strong. The failure should be restricted discretionary with clear direction from council as to the matters of concern/control.	Amend so that the rule escalates to Restricted Discretionary with clear direction as to the matters of concern/control.
Margaret Montgomery (S446)	S446.029	NHR7	Oppose in part		Not stated
Margaret Montgomery (S446)	S446.030	NHR8	Support	Agree in full	Retain as notified.
Margaret Montgomery (S446)	S446.031	NHR9	Oppose	The escalation should be to a restricted discretionary, as the non-complying status is considered incredibly restrictive considering the fanciful mapping that has been used which has been based on estimations as identified above in the strategic direction, and is not informed by engineering calculations.	Amend so that where Permitted Activity standard not met escalates to Restricted Discretionary Activity

Margaret Montgomery (S446)	S446.032	NHR10	Oppose in part	Should escalate to restricted discretionary limited to floor heights, discretionary allows for too much scope for such a narrow failure which is limited to overland flow paths for water.	Should escalate to restricted discretionary limited to floor heights, discretionary allows for too much scope for such a narrow failure which is limited to overland flow paths for water.
Margaret Montgomery (S446)	S446.033	NHR11	Oppose in part	Some of the conditions are vague, such as minimise risk to human life, there is no measure for a number or provisions,	Make matters of discretion clearer and more measurable.
Margaret Montgomery (S446)	S446.034	NHR12	Oppose in part	Some of the conditions are vague, such as minimise risk to human life, there is no measure for a number or provisions.	Make matters of discretion clearer and more measurable
Margaret Montgomery (S446)	S446.035	NHR13	Oppose in part	This standard essentially prevents additions to any houses, however some consideration should be given for engineering solutions with the standard where not being met should be restricted discretionary in line with the above restricted discretionary standards.	Make rule Restricted Discretionary with clear measurable matters of discretion.
Margaret Montgomery (S446)	S446.036	NHR14	Oppose		New buildings for sensitive activities should be amended.

Margaret Montgomery (S446)	S446.037	Natural Hazards Rules	Amend	The provisions for Earthquake Hazard Overlays allows for new residential buildings provided a hazard risk assessment is provided. Similar considerations should be undertaken for Westport with regard to the proposed district plan whereby the risk/probability of an earthquake is the same as the probability of a flood based on some of the recent modelling and timing since the southern alps fault line was active. Therefore considerations should be around for how water will actually flow through the town such that future developers should easily be able to calculate raised floor heights.	Amend the flood rules for Westport to take on board a similar approach to the Earthquake Hazard overlay whereby new residential buildings are allowed provided a hazard risk assessment is provided. The town should be mapped by council including where primary/secondary overland flow paths areas of inundation etc. a layer of mapping should also include lidar based mapping which accounts for the topography of the area,
Margaret Montgomery (S446)	S446.038	Coastal Setback Overlay	Oppose in part	A natural hazard risk assessment should have been undertaken by council in the determination of these areas and should not be put back onto applicants. The location gives council to much discretion and should be informed by set distances. Modification or retention of vegetation gives council to wide a scope with regard to landscaping	Amend overlay to reflect the outcome of a natural hazard risk assessment undertaken by the Council. Provide more detailed matters of discretion with set distances for location and more narrowing of scope as relates to location and modification/retention of vegetation.

				<p>matters. Agree with the other matters in full. I do however believe that set volumes or numbers should be applied, and while I acknowledge that this approach is limited based on the underlying zoning there should be some form of consideration for where these are appropriate, as the current measures are increasingly restrictive or require in-depth analysis from builders, planners etc. with nearly all development requiring resource consent.</p>	
Margaret Montgomery (S446)	S446.039	Coastal Tsunami Overlay	Oppose in part	<p>This is a continuation of s.10 of the RMA and therefore the rule is stating a right that all landowners have.</p>	<p>Amend the rule to reflect that these are rights that all landowners have under s10 of the RMA.</p>
Margaret Montgomery (S446)	S446.040	Natural Hazards Rules	Oppose in part	<p>The overlay should be reassessed and mapped going forward. In a number of situations around the township of Westport further development is not viable without subdivision and intensification as informed by the NPS-UD which should be encouraged. In a number of these situations that s.106 of the RMA has more relevance than the above provisions and would allow</p>	<p>That the provisions should either be looser utilising more restricted discretionary matters, to inform developers about the scope of consideration rather than non-complying which gives far too much scope to the council to decline or control development throughout the region</p>

				for conditions of consent or considerations of similar standards in terms of raised height etc. Overall I believe , where based on the preference of staff could stifle development through the township.	
Margaret Montgomery (S446)	S446.041	SUB - P1	Support	Agree in full	Retain as notified.
Margaret Montgomery (S446)	S446.042	SUB - P2	Oppose in part	A - Rule a. is disagreed to in part, as the rule requires developers to upgrade the network as required, however in areas of anticipated development financial and development contributions are expected to cover this. C/D – This is a repeat of s.106 of the RMA in which it is required.E – the rule is vague in terms of what can be considered	A - additional costs, unless for large scale developments should not be required until networks are at capacity as this propagates a first come first serve basis for development. Delete C/DE — provisions should be around allotment design and engineering matters, with provisions for outdoor and open spaces to be a requirement of the proposed land use.N – should include a note about vesting of services in council upon completion/certification
Margaret Montgomery (S446)	S446.043	SUB - P3	Support	Agree in full	Retain as notified.
Margaret Montgomery (S446)	S446.044	SUB - P4	Oppose in part	C – the wording building platform contradicts A as the wording does not imply that piles would be appropriate and needs a raised	Wording should not specifically refer to foundation, but flood free options based on raised FFL based on the datum and flood data.

				foundation, however this would have the effect of potentially shifting/diverting overland flow paths.	
Margaret Montgomery (S446)	S446.045	SUB - P5	Oppose in part	This standard seems to restrict development, particularly if the developer has financial limitations with regard to the development as this gives council a lot of discretion over the subdivision outcomes.	Amend standard so less restrictive of development.
Margaret Montgomery (S446)	S446.046	SUB - P6	Oppose in part	A - The terminology is vague in terms of density and part of the consideration should allow for rural subdivision and density standards, particularly in instances where rural lifestyle developments are becoming more prevalent due to limited residential areas along the coast. F – is also vague and further considerations for engineering interventions which can mitigate this risk, but have not been addressed within this provision.	Allow for more rural subdivision. In relation to natural hazards allow for adaption not just focus on avoidance.
Margaret Montgomery (S446)	S446.047	SUB - P8	Oppose in part	Encourages staged development	Not stated

Margaret Montgomery (S446)	S446.048	SUB - P9	Support	Required by esplanade sections of RMA.	Retain as notified.
Margaret Montgomery (S446)	S446.049	SUB - R1	Oppose in part	The rule is in breach of the RMA, as it does not specify that it allows for additional allotments. How can you have a permitted subdivision as it would still require a s.223/224 certification to confirm the title – confusing provision which should be clarified further.	Not stated
Margaret Montgomery (S446)	S446.050	SUB - R2	Support	Agree in full	Retain as notified.
Margaret Montgomery (S446)	S446.051	SUB - R3	Support	Agree in full. Question Part F.	Clarify features referred to
Margaret Montgomery (S446)	S446.052	SUB - R4	Support	Agree in Full	Retain as notified.
Margaret Montgomery (S446)	S446.053	SUB - R5	Support	Agree in Full	Retain rule but better present the information rather than the cluster within this condition at the moment
Margaret Montgomery (S446)	S446.054	SUB - R6	Support	Agree in full	Retain as notified.

Margaret Montgomery (S446)	S446.055	SUB - R9/ECO - R6	Not Stated	Does this section mean that council has the discretion to decide if land is of significant indigenous biodiversity// can a council planner randomly decide that the vegetation is indigenous -	more clarity as to planners scope with determining an ecological assessment is viable.
Margaret Montgomery (S446)	S446.056	SUB - R12	Not Stated	The provision of this zone is around areas of intensification for future development, however the provisions requiring three waters, would be difficult if this work has not been completed, or is in the process of being completed, or it would have the effect of restricting subdivision.	Greater direction should be provided by the plan.
Margaret Montgomery (S446)	S446.057	SUB - R13	Oppose in part	The subdivision rule is worded well, however the proposal should include a provision with relation to the size of an allotment, that where the subdivision does not result in land use non-compliance, council has the ability to waive the minimum allotment standard. This is solely as Townhouse/Higher Density is becoming more prevalent due to the prohibitive costs of standalone dwellings in larger scale developments. Second d and e as matters of discretion again give	Amend rule to allow that where the subdivision does not result in land use non-compliance, council has the ability to waive the minimum allotment standard and that matters of discretion d and e be more accurately defined in the Plan with in regards to natural hazards so that it offers potential solutions or guidance for applicants.

				council to much scope as realistically what subdivision is not going to give rise to one of these activities... further council could debate the intended use.	
Margaret Montgomery (S446)	S446.058	SUB - R17	Oppose in part	The wording of the rule means that even if they are engaged they still need to be notified	Amend so that notification is not required if iwi are engaged.
Margaret Montgomery (S446)	S446.059	SUB - R20	Not Stated	You haven't completed this section or given council any scope over the matters of discretion	Make a Restricted Discretionary Activity and provide Matters of Discretion.
Margaret Montgomery (S446)	S446.060	SUB - R21	Not Stated	You haven't completed this section or given council any scope over the matters of discretion.	Make a Restricted Discretionary Activity and provide matters of discretion.
Margaret Montgomery (S446)	S446.061	SUB - R22	Amend	You haven't completed this section or given council any scope over the matters of discretion	Make a restricted discretionary activity and provide matters of discretion.
Margaret Montgomery (S446)	S446.062	SUB - R23	Amend	You haven't completed this section or given council any scope over the matters of discretion	Make a restricted discretionary activity and provide matters of discretion.
Margaret Montgomery (S446)	S446.063	SUB - R24	Not Stated	Seems weird that you can build in these setbacks, but cannot subdivide seems like this could get flipped via the permitted baseline argument for development.	Review in light of Permitted Baseline.

Margaret Montgomery (S446)	S446.064	SUB - S1	Oppose in part		Include a note that if the proposal does not generate new land use non-compliance's or that where this can be demonstrated that council can waive this standard.
Margaret Montgomery (S446)	S446.065	SUB - S2	Oppose in part	Don't bring the building act into resource consents – the processes are separate for a reason and developments will have to comply with these standards anyway	Delete Clause 1 in relation to building platforms.
Margaret Montgomery (S446)	S446.066	SUB - S3	Amend	Referencing other reports just makes it more difficult for laymen to understand the plan.	The proposal should state approximate sizes for self potable water based on the size of the dwelling
Margaret Montgomery (S446)	S446.067	SUB - S4	Amend		Could just make the first note a land use condition for all new dwellings in urban zones that a water tank is provided.
Margaret Montgomery (S446)	S446.068	SUB - S5	Oppose in part	The standard mentions demonstrate sanitary disposal, this is typically a building act matter and would be useless to consider at the planning stage.	Remove reference to requirements around demonstrating sanitary disposal.
Margaret Montgomery (S446)	S446.069	SUB - S7	Support	Agree in full	Retain as notified.
Margaret Montgomery (S446)	S446.070	SUB - S8	Support	Agree in full.	Retain as notified.

Margaret Montgomery (S446)	S446.071	SUB - S8	Amend	The wording holds no legal weight.	Note 2 should be an advice note rather than a standard
Margaret Montgomery (S446)	S446.072	SUB - S9	Support	Agree in full.	Retain as notified.
Margaret Montgomery (S446)	S446.073	SUB - S10	Support	Agree in full.	Retain as notified.
Margaret Montgomery (S446)	S446.074	SUB - S11	Not Stated	What is the purpose of a point strip?	Clarify what a point strip is.
Margaret Montgomery (S446)	S446.075	Subdivision	Amend	The wording of the rules in this section is chaotic and difficult to understand with poor direction provided. It would not be possible for someone to understand the subdivision rules without professional help.	Make subdivision rules more accessible to a lay person.
Margaret Montgomery (S446)	S446.076	EW - R1	Oppose in part	The standard requiring clean fill material could be difficult for some activities – or if the proposal is a redistribution of material across the site to create a level platform. The standard with the exception of vertical alteration contains no other rules – for example you could	Amend Standard 1 to provide an exemption for piles, amend the standard requiring clean fill material to provide for redistribution of material, amend the standard for the exception of vertical alteration to include a maximum area or volume.

				remove 1.5m across 10ha – some controls could include area or volume. Standard 1 should also include an exemption for piles for earthworks considering that basically all development is required to be raised significantly	
Margaret Montgomery (S446)	S446.077	EW - R2	Amend	EW – R2 – 2e Most swimming pools will fail the vertical alteration standard...EW – R2 – 2f Same as above the depth of a grave is usually beyond 1.5m	Ensure graves and swimming pools are exempt from standards.
Margaret Montgomery (S446)	S446.078	EW - R4	Amend	EW-R4 – 4. If you meet the permitted standards – do you require a code of compliance for this standard/ how would you monitor this standard... 4c – is inconsistent with EW-R1 vertical alteration. Agree to the restricted discretionary matters.	Clarify how compliance is assessed for standard 4. Make 4c consistent with EW - R1. Retain escalation to Restricted Discretionary
Margaret Montgomery (S446)	S446.079	Light Rules	Support	Agree in full	Retain as notified.
Margaret Montgomery (S446)	S446.080	NOISE - R3	Oppose in part	This standard for setbacks is restrictive for development, considering the setbacks which would require a large distance setback for development –	Reduce the setback requirements.

				particularly those in settlements which have looser speed limits, e.g. Charleston & the outskirts of Greymouth – this should be amended	
Margaret Montgomery (S446)	S446.081	NOISE - R12	Amend		Clarify how noise effects on wildlife and habitat are assessed,
Margaret Montgomery (S446)	S446.082	Signs Rules	Amend	this section is incredibly confusing	Clarify the rules
Margaret Montgomery (S446)	S446.083	General District Wide Matters	Amend	The general rules are confusing, over worded and partially confounding, particularly when the rules are pretty consistent with the existing or national standards, yet the formatting of information and display make the plan difficult to understand.	Clarify and simplify the rules.

Margaret Montgomery (S446)	S446.084	GRZ - R1	Amend		<p>Follow national direction and say that you can have 3 dwellings per site.. Amend so that have rules around where no additional non- compliance are generated and then this standard can be waived.</p> <p>Amend so that the setback is consistent with the existing rules in the regions, and historic development forms.</p>
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Margaret Montgomery (S446)	S446.085	GRZ - R2	Support	Agree in full	Retain as notified.
Margaret Montgomery (S446)	S446.086	GRZ - R3	Support	Agree in full	Retain as notified.
Margaret Montgomery (S446)	S446.087	GRZ - R4	Support	Agree in full	Retain as notified.
Margaret Montgomery (S446)	S446.088	GRZ - R5	Support	Agree in full.	Retain as notified.
Margaret Montgomery (S446)	S446.089	GRZ - R6	Oppose in part	There should be additional standards considering the rampant use of Airbnb on the coast which has made renting difficult	Provide additional standards for noise and a limit of number of nights per 12 month period for use as visitor accommodation. Clarify how Council will monitor standards 4 and 5.
Margaret Montgomery (S446)	S446.090	GRZ - R7	Support	Agree in full	Retain as notified.
Margaret Montgomery (S446)	S446.091	GRZ - R8	Support	Agree in full	Retain as notified.
Margaret Montgomery (S446)	S446.092	GRZ - R9	Support	Agree in full	Retain as notified. Provide some allowance for developers to develop in a similar matter as papakainga developments.

Margaret Montgomery (S446)	S446.093	GRZ - R10	Support	Agree in Full	Retain as notified.
Margaret Montgomery (S446)	S446.094	GRZ - R11	Support	Agree in full.	Retain as notified.
Margaret Montgomery (S446)	S446.095	GRZ - R12	Support	Agree in full.	Retain as notified.
Margaret Montgomery (S446)	S446.096	GRZ - R13	Oppose in part		Provide an allowance for party walls or where it is related to a subdivision, failing internal boundary standards that these are not applicable.
Margaret Montgomery (S446)	S446.097	GRZ - R14	Oppose in part	Rules should be more restrictive for short term temporary accommodation, further there are design standards which motels etc have to meet with regard to accesses, fire standards etc which could be considered.	Provide additional matters of discretion such as access, fire standards requirements.
Margaret Montgomery (S446)	S446.098	GRZ - R15	Support	Agree in full.	Retain as notified.
Margaret Montgomery (S446)	S446.099	GRZ - R16	Oppose in part	The density standard should be able to be waived if there are no other failures, as multi storey developments are more compact developments and are more	Provide for density standard to be able to be waived if there are no other infringements of the rule.

				prevalent forms of development across the rest of the country	
Margaret Montgomery (S446)	S446.100	GRZ - R17	Amend	It would make sense for them to have the same standards as medium density	Provide same standards as medium density housing.
Margaret Montgomery (S446)	S446.101	GRZ - R18	Support	Agree in full.	Retain as notified.
Margaret Montgomery (S446)	S446.102	GRZ - R19	Support	Agree in full	Retain as notified.
Margaret Montgomery (S446)	S446.103	GRZ - R20	Support	Agree in full.	Retain as notified.
Margaret Montgomery (S446)	S446.104	GRZ - R21	Amend	Across the coast there is issues with rentals which is restricting population growth, particularly as tourism becomes more popular again	Provide additional controls around residential visitor accommodation or some form of restriction upon time limits for renting of dwellings,
Margaret Montgomery (S446)	S446.105	GRZ - R22	Support	Agree in full	Retain as notified.
Margaret Montgomery (S446)	S446.106	GRZ - R23	Support	Agree in full.	Retain as notified.

Margaret Montgomery (S446)	S446.107	GRZ - R24	Support	Agree in full	Retain as notified.
Margaret Montgomery (S446)	S446.108	General Residential Zone Rules	Amend	The rules are quite straightforward and appropriate. I would mention that some of the standards could include amendments or scope for council to waive standards if no additional non-compliance's are generated or consideration for how these rules interact with subdivisions.	Amend the standards to better interact with subdivisions and provide scope or council to waive standards if no additional non-compliances.
Margaret Montgomery (S446)	S446.109	Natural Hazards Rules	Oppose	I don't believe that the principles of "Natural Justice" have been applied in relation to hazards - for example there are little or no restrictions in relation to development near identified fault-lines, but there are severe restrictions in relation to future supposed flooding, simply due to to the recent flooding activity, even through both hazards have a similar possible return period.S.17 Avoid, Remedy or Mitigate are the fundamentals of the RMA - Options for implementing these are very limited in this document and over	Amend the rules to be less restrictive in terms of adaptability options - ie considering alternatives - like pile foundations or 2 story buildings, with non-habitable areas on the new ground floor

				all, it only seems to consider avoiding development	
Margaret Montgomery (S446)	S446.110	Whole plan	Amend	TTP Plan requires significant alterations and clarification to make the plan more usable and functional, for both planners and the general public.	Amend the plan so it is easier to read and use.
Margaret Steele (S214)	S214.001	SASM 36	Amend	Concerned that rules aren't clear in the plan Would like more information on how the SASM will affect the property in future.	Would like more information on how the SASM will affect the property in future.
Margaret Steele (S214)	S214.002	Sites and Areas of Significance to Māori Rules	Not Stated	Concerned that rules aren't clear in the plan	Provide clearer rules for Sites of Significance to Māori Site 36
Margaret Williams (S394)	S394.001	Sites and Areas of Significance to Māori	Amend	Our submission relates to property Lot 1 DP 336229 BLK IX Gillespies SD, Valuation no. 2580064104 as being within a site or Area of Significance to Maori 139 under TTPP. We oppose the area as stated and shown on the map plan SASM139 as being in the wrong place [refer submission for information] We would like to propose that the southern boundary of your plan, which at the moment follows the present-day roads, be moved north by at least 500m. This	To have the southern boundary of the plan moved at least 500m north of its current position and have the northern boundary moved further north to take in the northern end of Gillespies Beach and the lagoon area.

				would take all free-hold land out of the plan, ensuring peace of mind for the landowners in case later designation of the land be changed to Maori ownership. We also propose that the northern boundary be extended to the lagoon where the Maori people actually camped. We would like it noted that the area should continue to always be available for people to walk and see the historical aspects of the area.	
Margaret Williams (S394)	S394.002	SASM 139	Amend	Our submission relates to property Lot 1 DP 336229 BLK IX Gillespies SD, Valuation no. 2580064104 as being within a site or Area of Significance to Maori under TTPP. We oppose the area as stated in SASM139 as being in the wrong place. [refer to submission for more detail]	The Southern boundary on plan SASM139 be moved north by 500m, thus excluding land held in freehold, and removing any future headache if land designation should change. The Northern boundary be moved to the Northern end of the beach including the lagoon area.
Maria McKay (S409)	S409.001	Mineral Extraction Zone	Oppose	1. Environmental destruction that will alter the watershed behind our houses that could result in severe flooding in heavy rainfall, native trees hold the water back on steep inclines. 2. Constant noise from quarrying. 3. Heavy trucks down a quiet road. 4. Limestone dust is a	I oppose limestone extraction behind or near our houses and quarrying to support farmers other than those living in the Karamea environs. Remove Karamea Lime Company Mineral Extraction Zone and expansion.

				toxin in the air. Our subdivision is already here so if they need to quarry at natural area near a native forest, they should have considered this first.	
Marie Elder (S352)	S352.001	Settlement Zone	Support	this seems appropriate zoning for Ross subdivision	Retain Coastal Settlement Precinct at Ross Subdivision/Hartmount Place
Marie Elder (S352)	S352.002	SETZ - R1	Support	REASON: to prevent over-development and over-clearance of this bush-clad area.Note: some sections are only 800sqm, so exceptions will need to be made for those.	Retain density provisions in Rule 1 - but provide some allowance for exceptions for existing 800m2 sections.
Marie Elder (S352)	S352.003	Overview	Support in part	I support most of the overview as being a good description of the areas where the Zone is found.I seek a minor amendment in relation to commercial activities given that once an imbalance of commercial over residential accommodation is reached, the soul is sucked out of small communities such as this, situated on a no exit-road of only around 500m. Note: the TTPP overview refers to 'settlements in Grey District' but this should surely include Buller and Westland Districts	That the overview be amended to insert the word 'limited' before 'commercial activities' and to refer to settlements also in Buller and Westland Districts,

Marie Elder (S352)	S352.004	SETZ - R2	Amend	I support R2, 1- 4,6: Rules on maximum height, site coverage, floor area and projection REASON: to protect as much natural habitat and ambience as is possible within a residential area. I seek that R2, 5a: Rule for “the Kumara Junction Developments area” also be applied to the Ross Subdivision Punakaiki. And that, if a 5m buffer zone is not possible within a narrow section for example, a screen of native vegetation must still be in place. REASON: we understood similar protections were originally part of the BDC rules for our subdivision and wish to see them reinstated.	Retain draft Rule 2, apply Clause 5a to the Ross Subdivision at Punakaiki as well as Kumara Junction.
Marie Elder (S352)	S352.005	SETZ - PREC3 - Coastal Settlement Precinct	Amend	Requests for additional rules: In addition to R2, 5a to apply at the Ross Subdivision, I ask for restrictions on clearance of native vegetation inside the 5m buffer zone, to this effect: when clearing an accessway and a building site, gravel to be laid only on the driveway area, until a building consent is issued, and then gravel to be laid only on the	Provide additional rules in the Ross Subdivision so that when clearance for access and building, that only the building footprint and 2m surrounding area has gravel spread across it.

				<p>actual building footprint and immediately surrounding it [say a 2m skirt].REASON: The above request is to prevent repeats of what has already happened on some sections in Te Miko: in the worst case an entire section has been cleared, a deep layer of gravel spread over the whole area, then building plans abandoned. The result is a gorse-filled gravel pit where once there was lush indigenous vegetation and wildlife habitat. The gorse has also been sprayed, further compromising the natural environment.</p>	
Marie Elder (S352)	S352.006	SETZ - PREC3 - Coastal Settlement Precinct	Amend	<p>We also need a rule to protect the Ross subdivision from widespread vegetation clearance to create commercial parking spaces, as has already happened at the far end of Ross Place. Restrictions could be put in place proportionate to building size.</p>	<p>The Coastal Settlement Precinct rules restrict the amount of vegetation clearance for commercial parking spaces.</p>
Marie Elder (S352)	S352.007	Natural Character and the Margins of Waterbodies Rules	Amend	<p>Further protection of watercourses. The current requisite culvert at the Ross Subdivision at Te Mike is not enough in this karst landscape, for example two watercourses in Ross</p>	<p>Better protection of watercourses during development.</p>

				<p>Place have been cleared of indigenous vegetation and filled in with copious loads of gravel, albeit with culverts, in recent years, one for a commercial carpark and one for a now-abandoned building project. This disturbance of natural watercourses by piling gravel into a depression through which water previously flowed from an observed network of channels, has apparently caused water to find other routes of flow, creating at least two issues downstream: Truman Beach waterfall now runs muddy after rain, not noted previously, and Pavers on a downstream neighbours' carpark now float after rain, again not noted before</p>	
<p>Marie Elder (S352)</p>	S352.008	SETZ - PREC3 - Coastal Settlement Precinct	Amend	<p>A rule to restrict the development of tourist infrastructure within the subdivision, for example any widening of the road to accommodate tourist traffic. We have already seen bus-passing lanes proposed, in a 2013-14 resource consent application As well as an adverse effect on the tranquil forest</p>	<p>Rules restricting the development of tourist infrastructure and road widening to accommodate tourist traffic.</p>

				<p>ambience and remaining wildlife habitat, widening or indeed further sealing of the road would increase vehicle speed, creating danger to vehicles, cyclists and pedestrians exiting discreet driveways and using the road.</p>	
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Marie Elder (S352)	S352.009	SETZ - R3	Support	REASON: protect the existing outstanding natural environment and prevent intrusive development	Retain "New buildings are no more than 100m in ground floor area and additions to existing buildings add up to no more than 50m2 ground floor area"
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Marie Elder (S352)	S352.010	SETZ - R6	Amend	REASON: protect the existing outstanding natural environment and prevent intrusive development.	Retain, adding REQUEST: that roadside signs e.g. advertising accommodation, should be small size and of non-intrusive colouring
Marie Elder (S352)	S352.011	SETZ - R7	Support	REASON: protect the existing outstanding natural environment and prevent intrusive development	Retain rule

Marie Elder (S352)	S352.012	SETZ - R9	Amend	REASON: noise travels through the quiet forest and disturbs both residents and other visitors.	Retain, adding REQUEST: all visitors and guests of any 'Home Business' [including Air B&B and Backpackers] to not be permitted to socialise out of doors between the hours of 10pm and 8am and required to maintain quiet when moving about outside during these hours.
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<p>Marie Elder (S352)</p>	<p>S352.013</p>	<p>SETZ - R10</p>	<p>Amend</p>	<p>SUPPORT: for future accommodation development in the Ross subdivision, particularly where buildings are constructed purely for short-term rental [as opposed to holiday homes often used by the owner/s and otherwise available for short-term rental].REASON: an imbalance of commercial over residential accommodation places an unreasonable burden on residents within a small community. I believe an insupportable imbalance has already been reached in our small coastal settlement, with, at last count, more than 100 visitor beds [57 in backpacker accommodation and at least 45 in unhosted holiday accommodation] compared with 12 permanent residents. The impact of visitor beds is particularly significant as all dwellings in our community are located on a narrow, unsealed no-exit road only around 550m in length. Permanent residents would prefer more residents as neighbours rather than a constant in-out flow of tourists.</p>	<p>Retain for Ross subdivision, with additional rules Retain this Rule.</p>
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<p>Marie Elder (S352)</p>	<p>S352.014</p>	<p>SETZ - PREC3 - Coastal Settlement Precinct</p>	<p>Amend</p>	<p>The existing large backpacker accommodation in Hartmount and Ross Place is a major cause of current visitor pressure on residents and infrastructure, as well as on the natural environment, much more so than the existing short-term rental holiday homes. The backpacker business has undertaken major clearance of indigenous vegetation for bus and car parking, and in season crowds of tourists overwhelm residents. It is also spread over multiple dwellings on several discrete properties throughout the entire [still partially] bush-clad subdivision, which leads to many daily vehicle movements, and also means visitor activity and noise cannot be adequately supervised by the ever-changing management personnel.</p>	<p>ensure rules prevent over-development and do not allow continued expansion of existing tourism businesses.</p>
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Marie Elder (S352)	S352.015	SETZ - R10	Amend	I support this rule due to the issues at Te Miko, however I seek amendments that recognise issues that have arisen with tourist accommodation. Hartmount Place.	Amend rules so that there are restrictions on the number and size of buses entering Hartmount Place; there is a specific prohibition on vehicles reversing in, or onto, Hartmount or Ross Place i.e. they must actually have turnaround room on site; Accommodation providers be required, where there are multiple units, to offer numbered parking spaces to be reserved when accommodation is booked, to ensure no parking overflow onto road or other people's property; no further clearance of indigenous vegetation to create commercial parking.
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Marie Elder (S352)	S352.016	SETZ - R13	Support	protect the existing outstanding natural environment and prevent intrusive development	Retain rule
Marie Elder (S352)	S352.017	SETZ - R14	Support	protect the existing outstanding natural environment and prevent intrusive development	Retain rule
Marie Elder (S352)	S352.018	SCHED2 - SCHEDULE OF NOTABLE TREES	Support	It is reassuring to see the establishment of this schedule and there will be many more specimens in the district which could and should be added.	Retain and expand schedule of trees
Marie Elder (S352)	S352.019	Mineral Extraction Zone	Oppose	I oppose the identification of Barrytown flats as mineral extraction zone. It should be re-zoned appropriately to reflect an area which includes significant wetlands, coastal forest remnants, the flightpath of the threatened tāiko, wildlife habitat including that of the critically endangered bittern, freshwater systems, farms, homes, and small-scale businesses providing livelihood to locals such as holiday accommodation, small-scale gold mining and horse wagon tours. {refer original submission for detailed reasons}.	Remove the Mineral Extraction Zone from the Barrytown Flats.

Marie Elder (S352)	S352.020	General Rural Zone - Rules	Oppose	<p>If rules allow 3-4ha to be mined at a time, without requiring resource consent, this would be highly permissive, and so threatening to endangered wildlife species, to indigenous stands of vegetation and wetlands, to physical landforms and waterways, to the livelihood of residents and to the visitor experience of our 'untamed natural wilderness'. These draft GRZ rules would undermine the rights of rural residential neighbours who value environmental protections and/or have invested in rural property for a quiet, close-to-nature lifestyle, and/or are farming in harmony with the land, and/or are running a small, low-level business. In other words, the ratepayers whose lives are to be governed by the TTPP.</p>	Oppose the Permitted Activity rule for mineral extraction.
Mark Bowe (S69)	S69.001	SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	Oppose	<p>Current and Former Maori reserves should not be included as an SASM. Evidence of the significance or activity has not been provided to current land owners.</p>	Remove current and former Māori reserves from the SASM Schedule and Maps.

Mark Bowe (S69)	S69.002	Sites and Areas of Significance to Māori Rules	Amend		Request for clarification whether rules apply or not on properties with SASM overlay. Need guarantees that the value of the property will not be negatively influenced by this implementation. Landowners should get rewards for protecting these areas of significance.
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Mark Jones (S239)	S239.002	Sites and Areas of Significance to Māori	Oppose	We wish to advise that we oppose the establishment of SASM 68 -Paroa Lagoon in its current format. The mapping is incorrect and amendments are supported by Poutini Ngāi Tahu.	That the eastern boundary of the designated SASM68 be amended and realigned to the Paroa Lagoon waterway eastern edge. New large scale maps accurately showing this new boundary delineation be produced and supplied to all affected parties for approval.
Mark Jones (S239)	S239.003	Sites and Areas of Significance to Māori Rules	Amend	The RMA states that because SASM are considered a type of historic heritage, rules associated with them have legal effect from the time the proposed TTPP was notified. This is totally rejected by the affected private landowners, who are submitting and requesting that these rules be withdrawn from the private properties identified.	That any of the proposed references, rules, or conditions, placed on any private property fronting the state highway be withdrawn immediately. Any Rules with immediate effect be withdrawn from the currently effected private properties.
Mark Wiechern (S254)	S254.001	Rezoning Requests	Amend	We currently reside within 40m of the proposed rural residential boundary and the balance of our land is not suitable or used for farming or other general rural activities. The 3 rural residential properties directly in front of us are accessed via a driveway on our land (easement) We have started the process of compiling to lodge a RC application for subdivision to create 3 new 'rural residential' lots on our	Rezone Lot 5 DP 460905 Blk II Steeples SD Settlement Zone Rural Residential Precinct from General Rural Zone.

				property to extend the rural residential options for people to reside here in an area that is not of coastal significance or amenity value. Our lot is perfectly positioned for rural residential minor development in a considered and limited manner and this is our intent.	
Martin & Co Westport Ltd and Lumberland Building Market Westport (S543)	S543.001	DESIGNATIONS	Amend	These appear to have been omitted from the plan in error.	Include Westport Community Hall, Memorial Hall, PYC Hall and Victoria Park in Designations.
Martin & Co Westport Ltd and Lumberland Building Market Westport (S543)	S543.002	Westport/Kawatiri Town Centre and Mixed Use Zone Urban Design Guidelines	Oppose	We are not sure of the relevance of this statement, the building referred to is outside of the Town Centre Zone which is one of the reasons we built there,	Remove the following statement and photo from the guidelines: " This long low building shape should be avoided. This building also lacks windows and has limited design features and detail to add interest to the building. The building colours are also very out of character with other buildings in the vicinity and are part of a sign to brand the building. "
Martin & Co Westport Ltd and Lumberland	S543.003	Commercial Zone Rules	Oppose	The proposed conditions for commercial zones seem very restrictive and we are not confident that the rules allow our sort of	Ensure the plan rules allow for developments such as the Martin and Co building and Lumberland Building Market Westport as a Permitted Activity

Building Market Westport (S543)				development (no verandah and few windows)	
Martin & Co Westport Ltd and Lumberland Building Market Westport (S543)	S543.004	Natural Hazards	Oppose	In its current format the financial and social impact would cause a lot of pain for anyone who owns a property.	That the plan includes the maps for Westport with the flood walls/stop banks included.
Martin & Co Westport Ltd and Lumberland Building Market Westport (S543)	S543.005	Westport Hazard Overlay	Oppose	In its current format the financial and social impact would cause a lot of pain for anyone who owns a property. on the modelling to date using 50-year flood heights would be more than adequate. If it was 2% AEP with a 0.5m freeboard there may have been no inundation at all in July 2021.	Amend the rules so that they are based on floor heights required with the flood protection in place. If that is not possible it should include rules that allow them to be considered in the future. The rules should be amended to refer to a 2% AEP level. The rules should have provision to allow for these heights to come into effect for the various areas in town as the works are completed to protect that area.
Martin & Co Westport Ltd and Lumberland Building Market	S543.006	Natural Hazards Objectives	Amend	Similarly to NH — 04, the role that protective structures play in natural hazard mitigation needs to be recognised in the Natural Hazards Objectives.	Add a new objective: To ensure the role of hazard mitigation played by protective structures and works that minimise impacts of hazards including rock walls and stop banks is recognised and protected

Westport (S543)					
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<p>Martin & Co Westport Ltd and Lumberland Building Market Westport (S543)</p>	<p>S543.007</p>	<p>NHP3</p>	<p>Oppose in part</p>	<p>Inclusion of the word "existing" in this policy unduly limits future development, even where risk from natural hazard is low or could be substantially mitigated using technical solutions is obstructed</p>	<p>Amend as follows:</p> <p>When managing natural hazards:</p> <ul style="list-style-type: none"> a, Promote the use of natural features and appropriate risk management approaches in preference to hard engineering solutions in mitigating natural hazard risks; and b. Avoid increasing risk to people, property and the environment; while c. Recognising that in some circumstances hard engineering solutions may be the only practical means of protecting communities and critical infrastructure
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Martin & Co Westport Ltd and Lumberland Building Market Westport (S543)	S543.008	Commercial and Mixed Use Zones Objectives	Support	We support the objectives.	Retain as notified
Martin & Co Westport Ltd and Lumberland Building Market Westport (S543)	S543.009	CMUZ - P2	Support	We support the policy	Retain as notified.
Martin & Co Westport Ltd and Lumberland Building Market Westport (S543)	S543.010	CMUZ - P3	Support	We support the policy	Retain as notified.
Martin & Co Westport Ltd and Lumberland	S543.011	CMUZ - P4	Oppose	These provisions are too restrictive in their scope. They do not They do not adequately recognize that to be	Delete points a. — d.

Building Market Westport (S543)				functional and provide services the community wants and needs.	
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<p>Martin & Co Westport Ltd and Lumberland Building Market Westport (S543)</p>	<p>S543.012</p>	<p>CMUZ - P13</p>	<p>Oppose in part</p>	<p>These provisions are too restrictive in their scope. They do not adequately recognize that to be functional and provide services the community wants and needs. The commercial zone should not be constrained by such an emphasis on traditional "amenity values".</p>	<p>Amend as follows:</p> <p>Activities in the COMZ</p> <p>Commercial, MUZ - Mixe&Use and NCZ - Neighbourhood</p> <p>Centre Zones should:</p> <p>a. Meet performance standards on development and land use that do not create adverse effects beyond the boundaries of these areas, particularly in respect of residential areas;</p> <p>b. Provide safe urban design (including pedestrian and vehicle safety); and avoid the fragmentation of town centres</p>
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Martin & Co Westport Ltd and Lumberland Building Market Westport (S543)	S543.013	Rezoning Requests	Oppose in part	We do not agree with the extent of the commercial zone in Westport.	Amend zoning to include 34 Russell Street (Lot 1 DP 16517), 7 Pakington Street (Part Section 104 Town of Westport/Lot 2 A 444), 8 Pakington Street and 34 Russell Street (Lot 1 DP 475753).
Martin & Co Westport Ltd and Lumberland Building Market Westport (S543)	S543.014	COMZ - R1	Support in part	We support the rule in principle but believe that it is too onerous especially with regards to landscaping and building height	Amend to landscaping provisions to be less onerous. Amend points 1 as follows: The maximum height above ground level is 4-2 15 metres except that this standard does not apply to hose drying towers at Emergency Service Facilities
Martin & Co Westport Ltd and Lumberland Building Market Westport (S543)	S543.015	COMZ - R2	Oppose in part	We do not support point 1. It is unnecessary and onerous	Delete point 1.
Martin & Co Westport Ltd and Lumberland	S543.016	COMZ - R3	Support	We support the rule	Retain as notified

Building Market Westport (S543)					
Martin & Co Westport Ltd and Lumberland Building Market Westport (S543)	S543.017	COMZ - R4	Oppose	This rule is unnecessary.	Delete
Martin & Co Westport Ltd and Lumberland Building Market Westport (S543)	S543.018	COMZ - R5	Oppose	The rule is too complex and onerous.	Amend to be less complex and less onerous
Martin & Co Westport Ltd and Lumberland Building Market Westport (S543)	S543.019	COMZ - R6	Support in part	Point 1 for these rules should allow for existing, legal noncompliance with COMZ — RI.	Amend as follows: 1. All performance standards for Rule COMZ - RI other than those that relate to External Storage and

					<p>Recession Planes are complied with or the activity does not increase extent of existing noncompliance with performance standards for Rule</p> <p>COMZ - R1;</p>
<p>Martin & Co Westport Ltd and Lumberland Building Market Westport (S543)</p>	S543.020	COMZ - R7	Oppose	This rule is unnecessary.	Delete
<p>Martin & Co Westport Ltd and Lumberland Building Market Westport (S543)</p>	S543.021	COMZ - R8	Support in part	There should be no conditions included as part of this rule. It is appropriate that all activities listed in the rule be considered as part of a Discretionary Activity application.	<p>Delete condition 1 — 3.</p> <p>Amend as follows:</p> <p>Activity status where compliance not achieved: NA</p>
<p>Martin & Co Westport Ltd and Lumberland Building Market</p>	S543.022	COMZ - R9	Support	We support this rule.	Retain as notified

Westport (S543)					
Martin & Co Westport Ltd and Lumberland Building Market Westport (S543)	S543.023	COMZ - R10	Oppose	This is too onerous and should be a Discretionary Activity.	Amend status to Discretionary.
Martin & Co Westport Ltd and Lumberland Building Market Westport (S543)	S543.024	COMZ - R11	Support	We do not support this rule.	Delete
Martin & Co Westport Ltd and Lumberland Building Market Westport (S543)	S543.025	Permitted Activities	Support	We support that there are no relevant permitted activity rules relating to SASM 12	Retain as notified

Martin & Co Westport Ltd and Lumberland Building Market Westport (S543)	S543.027	Westport Hazard Overlay	Oppose	This overlay is inappropriate.Associated provisions talce an excessively restrictive approach to hazard management and mitigation.	Amend overlay and amend associated rules to be more enabling.
Martin & Co Westport Ltd and Lumberland Building Market Westport (S543)	S543.028	NHP13	Oppose	The Westport Hazard overlay is inappropriate.Associated provisions take an excessively restrictive approach to hazard management and mitigation.	amend to be more enabling
Martin & Co Westport Ltd and Lumberland Building Market Westport (S543)	S543.029	NHR1	Oppose	The Westport Hazard overlay is inappropriate.Associated provisions take an excessively restrictive approach to hazard management and mitigation.	amend to be more enabling
Martin & Co Westport Ltd and Lumberland	S543.030	NHR52	Oppose	The Westport Hazard overlay is inappropriate.Associated provisions take an excessively restrictive	Amend to be more enabling

Building Market Westport (S543)				approach to hazard management and mitigation.	
Martin & Co Westport Ltd and Lumberland Building Market Westport (S543)	S543.031	NHR53	Oppose	The Westport Hazard overlay is inappropriate. Associated provisions take an excessively restrictive approach to hazard management and mitigation.	Amend to be more enabling
Martin & Co Westport Ltd and Lumberland Building Market Westport (S543)	S543.032	Natural Hazards	Oppose	We understand that there is a possibility that the flood hazard severe overlay will be extended from what is notified in the proposed plan. We do not support our properties being included in any extension.	Oppose any extension of the flood hazard severe overlay from what has been notified that would include our properties.
Martin & Co Westport Ltd and Lumberland Building Market Westport (S543)	S543.033	SUB - R20	Oppose	The Westport Hazard overlay is inappropriate. Associated provisions take an excessively restrictive approach to hazard management and mitigation.	Amend to be more enabling

Martin & Co Westport Ltd and Lumberland Building Market Westport (S543)	S543.034	Flood Severe Overlay and Flood Susceptibility Overlay	Oppose	The Flood Hazard Severe overlay is inappropriate.Associated provisions take an excessively restrictive approach to hazard management and mitigation.	Amend the rules to be more enabling
Martin & Co Westport Ltd and Lumberland Building Market Westport (S543)	S543.035	Flood Severe Overlay and Flood Susceptibility Overlay	Oppose	The Flood Hazard Susceptibility overlay is inappropriate.Associated provisions take an excessively restrictive approach to hazard management and mitigation.	Amend the rules to be more enabling
Martin & Co Westport Ltd and Lumberland Building Market Westport (S543)	S543.036	Natural Hazards	Oppose	We understand that there is a possibility that the Flood Hazard Susceptibility overlay will be extended from what is notified in the proposed plan.We do not support our properties being included in any extension.	Oppose any extension from what has been notified that would include our properties.
Martin & Co Westport Ltd and Lumberland	S543.037	NHP10	Oppose	The Flood Hazard Severe overlay is inappropriate.Associated provisions take an excessively restrictive	Amend the policy to be more enabling

Building Market Westport (S543)				approach to hazard management and mitigation.	
Martin & Co Westport Ltd and Lumberland Building Market Westport (S543)	S543.038	NHP11	Oppose	The Flood Hazard Susceptibility overlay is inappropriate. Associated provisions take an excessively restrictive approach to hazard management and mitigation.	Amend the policy to be more enabling
Martin & Co Westport Ltd and Lumberland Building Market Westport (S543)	S543.039	Natural Hazards	Oppose	We understand that there is a possibility that the Coastal Hazard Severe overlay will be extended from what is notified in the proposed plan. We do not support our properties being included in any extension.	Oppose any extension from what has been notified that would include our properties.
Martin & Co Westport Ltd and Lumberland Building Market Westport (S543)	S543.040	Natural Hazards	Oppose	We understand that there is a possibility that the Coastal Hazard Alert overlay will be extended from what is notified in the proposed plan. We do not support our properties being included in any extension.	Oppose any extension from what has been notified that would include our properties.

Martin & Co Westport Ltd and Lumberland Building Market Westport (S543)	S543.041	Coastal Severe and Coastal Alert Overlay	Oppose	The Coastal Hazard Severe overlay is inappropriate. Associated provisions take an excessively restrictive approach to hazard management and mitigation.	Amend the rules to be more enabling for coastal hazard severe
Martin & Co Westport Ltd and Lumberland Building Market Westport (S543)	S543.042	Coastal Severe and Coastal Alert Overlay	Oppose	The Coastal Hazard Alert overlay is inappropriate. Associated provisions take an excessively restrictive approach to hazard management and mitigation.	Amend the rules to be more enabling for Coastal Hazard Alert
Martin & Co Westport Ltd and Lumberland Building Market Westport (S543)	S543.043	SUB - P4	Oppose	The hazard overlays provisions take an excessively restrictive approach to hazard management and mitigation.	Amend to be more enabling
Martin & Co Westport Ltd and Lumberland	S543.044	SUB - R13	Oppose	The hazard overlays provisions take an excessively restrictive approach to hazard management and mitigation.	Amend to be more enabling

Building Market Westport (S543)					
Martin & Co Westport Ltd and Lumberland Building Market Westport (S543)	S543.045	SUB - R21	Oppose	The hazard overlays provisions take an excessively restrictive approach to hazard management and mitigation.	Amend to be more enabling
Martin & Co Westport Ltd and Lumberland Building Market Westport (S543)	S543.046	SUB - R23	Oppose	The hazard overlays provisions take an excessively restrictive approach to hazard management and mitigation.	Amend to be more enabling
Martin & Lisa Kennedy (S545)	S545.001	Rezoning Requests	Oppose	I oppose the fact that the designation is arbitrary and does not relate to a technical assessment of Land Use Capability,	Remove the highly productive land overlay from Lot 3 DP 2743) in the Grey Valley, at Atarau
Martin & Lisa Kennedy (S545)	S545.002	SUB - S1	Oppose	I object to a 10 hectare subdivision limit on my land given the conditions. I consider this is not	Remove the subdivision restrictions over the Highly Productive Land precinct.

				consistent with the existing pattern of land use in the area.	
Martin & Lisa Kennedy (S545)	S545.003	RURZ - O1	Support	I oppose objectives, policies and rules seeking avoidance of fragmentation of the land and lack of ability to have adequate input.	Remove reference to highly productive land
Martin & Lisa Kennedy (S545)	S545.004	GRUZ - PREC 5 - Highly Productive Land Precinct Policy	Oppose	I oppose the fact that the designation is arbitrary and does not relate to a technical assessment of Land Use Capability,	Delete the policy
Martin & Lisa Kennedy (S545)	S545.005	GRUZ - R3	Oppose	I oppose the fact that the designation is arbitrary and does not relate to a technical assessment of Land Use Capability,	Delete provision around highly productive land
Martin & Lisa Kennedy (S545)	S545.006	SUB - R6	Oppose	I oppose the fact that the designation is arbitrary and does not relate to a technical assessment of Land Use Capability,	delete provisions in relation to highly productive land
Martin & Lisa Kennedy (S545)	S545.007	SUB - R8	Oppose	I oppose the fact that the designation is arbitrary and does not relate to a technical assessment of Land Use Capability,	delete provisions in relation to highly productive land
Martin & Lisa Kennedy (S545)	S545.008	Natural Hazards	Oppose	The mapping is arbitrary with highly inaccurate information. I am concerned about the insurance implications and additional cost.	Remove the flood plain overlay from Lot 3 DP 2743) in the Grey Valley, at Atarau

Martin & Lisa Kennedy (S545)	S545.009	SUB - R23	Oppose	The mapping is arbitrary with highly inaccurate information. I am concerned about the insurance implications and additional cost.	Delete the reference to the flood plain overlay in the rule
Martin & Lisa Kennedy (S545)	S545.010	EW - R2	Amend	While we understand the need for rules we do not understand why the existing rules have not just been reinstated.	Replace the rules with those developed in the operative Grey District Plan with regard to National Grid matters.
Martin & Lisa Kennedy (S545)	S545.011	ENG - R7	Amend	While we understand the need for rules we do not understand why the existing rules have not just been reinstated.	Replace the rules with those developed in the operative Grey District Plan with regard to National Grid matters.
Martin & Lisa Kennedy (S545)	S545.012	SUB - R8	Oppose	While we understand the need for rules we do not understand why the existing rules have not just been reinstated	Replace the rules with those developed in the operative Grey District Plan with regard to National Grid matters.
Marty & Nicky Von Ah (S588)	S588.001	STRATEGIC DIRECTION	Support	Recognising the importance of farming, quarrying and mining to the West Coast	retain provisions relating to farming, quarrying and mining to the West Coast
Marty & Nicky Von Ah (S588)	S588.002	Rural Zones	Support	Providing for mineral extraction in zones	retain provisions for mineral extractions in zones
Marty & Nicky Von Ah (S588)	S588.003	Open Space and Recreation Zones	Support	Providing for mineral extraction in zones	retain provisions for mineral extractions in zones

Marty & Nicky Von Ah (S588)	S588.004	Mineral Extraction Zone	Support		Retain
Marty & Nicky Von Ah (S588)	S588.005	Rezoning Requests	Amend	Amend to Mineral Extraction Zone	Sections 2 SO 11712, Section 3 SO 11712, Lot 1 DP 315 and Part Lot 2 DP 315 be rezoned to Mineral Extraction Zone
Mary Stewart (S222)	S222.001	SASM 6	Oppose	I have researched via a long standing Karamea person who has studied Maori hx for many many years regarding the Karamea area who has informed me that there is no evidence to support your claim. There is no evidence or published documentation or literature, no physical evidence of any Pa sites, burial grounds, artifacts, human bones / remains or infact anything that supports your claim.It is well known that the mapped overlays of the areas of significance have been incorrect which appears to be the case regarding my property and indeed the Karamea area. The property I own has been bought and sold several times as a freehold unencumbered property with no mention of any clauses pertaining to significant historical sites or areas.	Remove SASM 6 from the property at 39 Maori Pt Road, Karamea.

Melva Crampton (S401)	S401.001	SASM 62	Amend	Grave concerns on what future restrictions may be enforced on the sale or use of property. Inclusion of SASM into LIM reports could have detrimental consequences for any future Valuation/Sale price. Property has been purchased 34 years ago and the necessary steps taken to negotiate to freehold the land. Submitter believed then that the local Iwi no longer had any interest in the property.	Submitter strongly objects to the freehold property at 2 Rochfort Street, Greymouth /Lot DP 776, valuation number 2562055500 being shown as a Site or Area of Significance to Maori.
Michael & Alyson Duff (S23)	S23.001	Rezoning Requests	Amend	Our request to rezone our land to Settlement Zone (Rural Residential Precinct) is based on the following reasons aligned to WCRC guiding principles:1. Our request is aligned with the operative RPS (July 2020) and presents nil departures from scope and affect.2.Our request does not require large scale infrastructure extensions and enjoys the same utility access and neighbouring and adjoining properties which are proposed as Settlement Zone (Rural Residential Precinct).3. Our land is not business and industrial.4. Our land is not classified as high natural,	Rezone our land (28 Tuis Way, Lot 2 DP 12993, Lower Buller Gorge, Westport 7892) from General Rural to Settlement Zone (Rural Residential Precinct), and be the same as our neighbouring and adjoining properties.

			<p>historic or Poutini Ngāi Tahu value.5. Our land is not classified as within a significant natural hazard zone.6.Our land is not subject to significant risk from climate change.7. Reverse sensitivity impact to industry – Not applicable since our land is not adjacent to productive uses or industry.8. Our request does not impact nor is it incompatible with nationally significant infrastructure.9. Our request does not impact nor is it incompatible with Future Urban Zone considerations.10. Clearly defensible zone boundaries – Our request is aligned with good practice principles of delineation and purpose.11. Property boundaries – Our request follows established property boundaries, and simply seeks to extend the proposed Settlement Zone (Rural Residential Precinct) to include our land and be the same as our neighbouring and adjoining properties.12. Spot zoning avoidance – Our request avoids being a single site zone by extending the proposed</p>	
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				Settlement Zone (Rural Residential Precinct) to include our land and be the same as our neighbouring and adjoining properties.13. Resource consent – Not applicable for our request as we are not determined by existing resource consents or rights.	
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<p>Michael and Dawn Ross (S98)</p>	<p>S98.001</p>	<p>Sites and Areas of Significance to Māori</p>	<p>Oppose in part</p>	<p>Land was previously owned by Māwhera Incorporation who sold it for private use. Mawhera Incorporated website states: - "Many of the properties owned by the incorporation are of little economic or cultural value. The incorporation had approval from the Māori Land Court to sell residential lands" We object to the assigning of a status of "a site or area of significance to Māori" now being added to our freehold title. This status was removed in 2006 when the property was sold by Mawhera Incorporated and the lease was transferred and merged to a freehold title. We purchased 34 Orowaiti as an unencumbered freehold title in 2013 and believe it should stay that way.</p>	<p>That all third-party interests and restrictions, and the status of "a site or area of significance to Māori"; be removed from the title NL7A/1047 pertaining to 34 Orowaiti Road, Westport. [SASM 14]</p>
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Michael Anderson (S268)	S268.001	Rezoning Requests	Oppose	We disagree with the proposal to erect four storey medium density homes on Revell St Hokitika. Allowing up to a 4 storey build would have a severe & negative impact on our home as we are currently on the eastside of Revell Street1. Blocking view2. Creating shading3. Would decline land and house value on the eastside of Revell street	Rezone Medium Density Residential Zone on Revell St to General Residential Zone.
Michael Chernishoff (S156)	S156.001	Sites and Ares of Significance to Māori	Oppose	Te Kainga (Cashmere Bay) is identified as a former Pā site - SASM79. We understand that the Pā site was close to the lake and that the foreshore and waters of Cashmere Bay, were used for landing waka. The submitters property is neither on the foreshore of Cashmere Bay nor includes the former Pā site. Accordingly there is no legal nor cultural basis for the plan to be extending the site of significance to Māori beyond the actual foreshore of Cashmere Bay.	Amend the proposed SASM79 area so that it is limited to the foreshore of Cashmere Bay and not beyond on the dry land.
Michael Elliott (S231)	S231.001	Sites and Ares of Significance to Māori	Oppose	We wish to advise that we oppose the establishment of SASM 68 -Paroa Lagoon in its current format. The mapping is incorrect and different	That the eastern boundary of the designated SASM68 be amended and realigned to the Paroa Lagoon waterway eastern edge. New large scale maps accurately showing this new boundary delineation be

				mapping is proposed by Poutini Ngāi Tahu.	produced and supplied to all affected parties for approval.
Michael Elliott (S231)	S231.002	Sites and Areas of Significance to Māori Rules	Amend	The RMA states that because SASM are considered a type of historic heritage, rules associated with them have legal effect from the time the proposed TTPP was notified. This is totally rejected by the affected private landowners, who are submitting and requesting that these rules be withdrawn from the private properties identified.	Any Rules with immediate effect be withdrawn from the currently effected private properties. That any of the proposed references, rules, or conditions, placed on any private property fronting the state highway be withdrawn immediately.
Michael Hill (S70)	S70.001	GRUZ - R12	Oppose	The permitted activity under this rule (mineral extraction of up to 20,000m ³ a year per property and 3ha at any one time) provides inadequate control where large-scale sand mining is proposed on several adjacent land parcels as is the case on the Barrytown Flats. Here there are 6 current mining permits issued to local artisanal sand miners totalling 88.4 ha. Cumulative effects on traffic (10 heavy vehicle truck movements per day per property), dust, noise, light pollution, amenity values, wildlife	Remove GRUZ R12 and make Mineral extraction a restricted discretionary activity in the General Rural Zone.

				disturbance and potentially other unanticipated effects would occur.	
Michael Hill (S70)	S70.002	GRUZ - R18	Oppose	This rule only applies to previously mined locations active since 2002 and listed in Schedule 10 which is empty, making GRUZ R18 irrelevant. Therefore this rule should be removed.	Remove GRUZ R18
Michael Hill (S70)	S70.003	GRUZ - R25	Amend	GRUZ-R25 requires modification to address potential issues arising where multiple land parcels near to one another may be granted mining consents as is currently being proposed on the Barrytown Flats. This should include provision for maximum cumulative local transport movements, noise, dust, lighting effects and effects on local wildlife and waterways.	Amend the rule to take account of potential cumulative effects of multiple mining operations in the same locality as proposed on the Barrytown Flats.

<p>Michael Hill (S70)</p>	<p>S70.004</p>	<p>MIN - O6</p>	<p>Amend</p>	<p>MIN - 06 (a): is a worthwhile strategic objective. MIN - 06 (b): is irrelevant where the adverse effects of industrial developments such as mining are inflicted upon communities and businesses. Biodiversity offsetting or environmental compensation will not compensate families suffering disrupted sleep resulting from night-time heavy truck movements or an ecotourism operator whose business has been adversely affected by a mining operation starting up adjacent to their business operations. Offsetting should be completely separate from the consenting process and not an integral part of the District Plan strategic objectives.</p>	<p>Amend MIN - O6 by removing MIN - 06 (b) "Allow adverse effects to be addressed by alternative mitigation measures such as biodiversity offsetting and environmental compensation."</p>
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Michael Hill (S70)	S70.005	Rezoning Requests	Amend	The Barrytown Flats Mineral Extraction Zone does not meet the criteria for a Mineral Extraction Zone because these land parcels do not have a resource consent for mineral extraction. On the contrary, a mining resource consent was recently declined for this property.	Rezone the Mineral Extraction Zone on the Barrytown Flats to General Rural Zone.
Michael Hill (S70)	S70.006	Overview	Support		Retain the criteria for identifying a land parcel as a Mineral Extraction Zone.
Michael Hill (S70)	S70.007	Rules	Amend	Heavy mineral concentrate (HMC) mining is a new activity on the West Coast. Companies pursuing this resource are confidently predicting a large increase in this activity across many sites. If the predictions of these companies are correct, the expansion of sand mining on the Coast is likely to be ongoing and substantial throughout the life of the TTPP. Large-scale HMC mining activities are different in scale and impact compared with artisanal/small-scale gold mining that has been a feature of the West Coast for over 150 years and which continues today as an accepted part of life in the Region. A major	Develop new MINZ rules relating to the management of HMC sand mining activities in support of MINZ - O2. HMC mining should be a Discretionary activity. Key considerations in the rules should be: <ul style="list-style-type: none"> the cumulative effects of heavy truck movements along the same stretch of road, night time movements, cumulative effects of dust, noise, effects on wildlife and loss of amenity values from increasing numbers of articulated mining trucks along routes to the port. Notification: should include considering whether the effects of heavy truck movements from a

				<p>difference between HMC sand mining and other forms of mining is the large volumes of material being shipped from the mine site in very large articulated trucks to two ports (Westport or Greymouth) for export. If not adequately managed, this will lead to excessive truck movements along major arterial routes and congestion close to the ports. The effect of cumulative sand mining consents needs to be considered in relation to their impacts on communities and businesses along the routes taken from mine to port in terms of noise, dust, traffic congestion, and amenity values en route. Large scale HMC mining thus requires some additional thinking with regards to TTPP rules and permissions.</p>	<p>mine site to a port will affect commercial tourism and hospitality businesses on the trucking route, potentially many kilometres away from the mine site.</p>
Michael Hill (S70)	S70.008	NCA41	Amend	<p>NCA 41 is described in the plan (Schedule 7). The high natural character overlay on the TTPP map does not include this area. It should be amended to include NCA 41.</p>	<p>Modify TTPP HNC overlay on the map to include NCA 041</p>
Michael Hill (S70)	S70.009	RURZ - O2	Support		<p>Retain objective as worded in the Proposed Plan</p>

Michael Hill (S70)	S70.010	RURZ - O5	Amend	The proposed edits to RURZ - O5 provide in my opinion, a clearer, more inclusive and balanced perspective, taking account of community needs and welfare around proposed new mining sites. The deleted words, in my opinion, add nothing useful to the objective	Amend RURZ - O5 as follows to make it more balanced and inclusive: To support the extraction of mineral resources located within the rural environment, provided adverse effects on existing communities are avoided, remedied or mitigated,
Michael Hill (S70)	S70.011	RURZ - P8	Support		Retain this policy in its current form.
Michael Hill (S70)	S70.012	RURZ - P10	Support		Retain this policy in its current form.
Michael Hill (S70)	S70.013	RURZ - P18	Oppose	Mineral extraction has been an integral part of commercial activities in the Grey District for over 150 years. There is no need for an 'enabling' policy in support of it. All aspects relating to the consenting of mining are adequately 'enabled' through the RMA and elsewhere in the plan.	Remove this policy
Michael Hill (S70)	S70.014	RURZ - P19	Amend	As written this policy is entirely biased towards mineral extraction at the expense of existing businesses and communities. As such it ignores the objectives outlined in MIN - 06	Amend this policy as follows: "Manage conflicts between proposed and existing mineral extraction activities and other land uses by ensuring that:

				(a) (vi) "The wellbeing of people and communities".	<ol style="list-style-type: none"> 1. Standards to minimise impacts on the amenity, rural character and natural values of rural areas are met; and 2. Mineral extraction activities that are incompatible with the effects and wellbeing of local communities and businesses are not established close to existing communities and business activities.
Michael Hill (S70)	S70.015	RURZ - P21	Amend	This amendment has been extended to address Objective MIN 06 (a) (vi) "The wellbeing of people and communities".	<p>Amend this policy as follows:</p> <p>Require proposals for new mineral extraction activities to provide adequate information on the establishment and operation of the mineral extraction activity, measures to reduce and/or avoid adverse effects and rehabilitation of the mineral extraction area, and measures to avoid adverse effects on existing local commercial businesses and the wellbeing of people and communities.</p>
Michael Hill (S70)	S70.016	RURZ - P23	Amend	This amendment is important for ensuring that the implications are considered of trucking large quantities of heavy mineral concentrate to ports outside of consenting District.	<p>Amend this as follows:</p> <p>Co-ordinate the approach to mineral extraction activity consents with the West Coast Regional Council, and the other District Councils, particularly where mineral sand mining is</p>

					proposed, or water resources and soil conservation are affected.
Michael Hill (S70)	S70.017	RURZ - P24	Oppose	RURZ - P24 is an ill-defined policy to "consider including these areas..." and as such adds nothing useful to the MINZ rules which are explicit and well defined.	Remove this policy

<p>Michael Hill (S70)</p>	<p>S70.018</p>	<p>RURZ - P25</p>	<p>Amend</p>	<p>The draft policy is biased towards support for extractive industries potentially at the expense of local businesses and communities. The amendments are intended to address this and provide balance. The phrase "as far as practicable" is too imprecise a term to be used in this context. It is unnecessary and should be removed.</p>	<p>Amend as follows:</p> <p>Maintain the quality of the environment and amenity of areas surrounding the mineral extraction activities by:</p> <ol style="list-style-type: none"> 1. Utilising management, mitigation and rehabilitation plans as key tools guiding day-to-day mineral extraction operations; 2. Managing dust, noise, vibration, access and lighting to maintain amenity values; 3. Managing traffic generation impacts on local businesses and communities and the operation and maintenance of the transport network; 4. Avoiding or mitigating impacts on significant indigenous vegetation, significant habitats of indigenous fauna, and amenities utilised by the general public, local communities and commercial activities;
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					<ol style="list-style-type: none">5. Ensure well located appropriately formed vehicle entrances, parking, loading and manoeuvring areas to sufficiently accommodate the requirements of the activity;6. Ensuring buildings and structures are appropriately located in relation to boundaries and natural features and are of an appropriate scale;7. Undertaking progressive remediation to address effects during extraction operations;8. Requiring sites to be rehabilitated and ensuring that appropriate methods are used for this purpose ; and9. Requiring effective oversight of management, mitigation and rehabilitation plans by independent gatekeepers.
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Michael Hill (S70)	S70.019	Noise Rules	Oppose	The noise rules in this plan have been subtly altered to allow increases in noise levels at more antisocial hours. It appears to have been designed to accommodate increases in commercial activities/mining without due consideration for the wellbeing of communities. The rulings for acoustic insulation for new buildings are unnecessarily restrictive, arbitrary and confusing.	Noise rules should revert back to the those in the old (Grey District) plan
Michael Hill (S70)	S70.020	STRATEGIC DIRECTION	Amend	The RMA Amendment Act that comes into force in November 2022 requires councils to have regard to emission reduction plans as well as national adaptation plans when making and amending district plans. The draft plan pays lip service to this (e.g. CR - 01) but has nothing to say on the requirement for emissions reductions.	Include a strategic directive that complies with the recent RMA amendment to have regard to emission reduction plans as well as climate change adaptation plans.
Michael Orchard (S583)	S583.001	Note with Regard to Plantation Forestry	Support	1 Supports the use of the NES-PF as the principal document regulating exotic production forestry on the West Coast.	Retain approach of relying on NES - PF to manage exotic production forestry.

Michael Orchard (S583)	S583.002	Ecosystems and Indigenous Biodiversity Rules	Amend	The plan should approve indigenous production forestry, where determined under the national rules set by MPI (we have a sizeable number)	Rely on MPI Indigenous forestry rules to manage indigenous production forestry on the West Coast.
Michael Orchard (S583)	S583.003	Ecosystems and Indigenous Biodiversity	Support	I support the Biodiversity principles, and rules	Retain Biodiversity principles and rules
Michael Orchard (S583)	S583.004	SCHED4 - SCHEDULE OF SIGNIFICANT NATURAL AREAS	Support	I support and congratulate the Grey District Council for their many Significant Natural Areas	Retain Grey District SNAs
Michael Orchard (S583)	S583.005	Ecosystems and Indigenous Biodiversity Policies	Amend	I am concerned that Buller and Westland District Councils haven't identified SNAs, and ASK that this plan be so worded to require them to undertake equivalent Surveys and Designations within a short time either using the old criteria as used by Grey District, or the new Government Biodiversity Policy coming out.	Word plan to require Buller and Westland District to undertake SNA surveys within a short timeframe.
Michael Orchard (S583)	S583.006	Open Space Zone	Amend	I request that all formal reserve types in the West Coast Region of many legal types be identified and mapped and named to support the Biodiversity	Identify and map all West Coast Region formal reserves.

<p>Michael Robson (S327)</p>	<p>S327.001</p>	<p>Coastal Severe and Coastal Alert Overlay</p>	<p>Amend</p>	<p>Re the property located at 4420 Haast Jackson Bay in South Westland which is covered by plus flood plain and coastal hazard severe overlays on it. Due to the demographic of the Haast community it is safe to say that property assets are the sole asset base for most of residents. For those with sections or who are looking to develop Land further there will be a prolonged resource consent process required with no guidance as to what would likely to be granted resource consent and what would not. A lot of residents will not be able to sell their properties due to the uncertainty as to the process of what would be required by council to obtain a resource consent to build on a property with a hazard overlay. Given the housing shortage and increased cost of living not only on the West Coast area but throughout the country I believe it is inappropriate for the council to be able to put in place such significant restrictions on property without some</p>	<p>That the council provide a list of what preventative measures would need to be taken for any property to be developed. Whether those measures required properties to be built that could be removed in the event of further coastal erosion with minimum floor levels required to be built on stilts, or if the water level increases to within a certain distance of the dwelling then the sewage and stormwater must be decommissioned and the dwelling abandoned or removed.</p>
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				reasonableness and guidance being provided to the current property owners of future property owners	
Michael Robson (S327)	S327.002	Sites and Areas of Significance to Māori	Amend	My property is affected by both the Maori SASM206 and SASM208. In relation to developing property within SASM'S there should be some sort of guidelines from the iwi in relation to what they will be considering when consent is requested for development within an area of significance. Whether that is a report from a suitably qualified person in relation to the particular property or other considerations a property owner will need to consider and respond to when requesting consent.	Provide guidelines on what matters need to be considered in relation the SASM when their consent is needed to do work.
Michael Snowden (S492)	S492.001	Sites and Ares of Significance to Māori	Amend	SASM 197 at Okuru is represented by a broad brush ellipse that does not differentiate between vegetation and pasture, but the rule relates to indigenous vegetation clearance.	More precise mapping of SASM 197 at Okuru
Michael Snowden (S492)	S492.002	High Natural Character	Oppose	The HNC layer is placed over our site and 9 others that have been recently subdivided at farmland at the southwest of Okuru-Turnbull River. The HNC status should be on the	Remove the HNC from the privately owned farmland southwest of Okuru-Turnbull

				DOC land not privately held land and especially not over farmland. The land is pasture and does not meet the criteria as HNC.	
Michael Snowden (S492)	S492.003	Natural Hazards	Oppose	There is a flood plain layer over the whole of my property at Okuru but no controls are provided.	Remove the flood plain layer from the submitters farm property at Okuru.
Michael Snowden (S492)	S492.004	Natural Hazards	Oppose	The Coastal Hazard Severe and Coastal Hazard Alert layers over Okuru are wrong and have been misapplied. The NIWA report is obscured somewhere and this a breach of natural justice. There are conflicts in timelines and the submitter believes Councils are protected by statute on liability for negligence after 10 years and so that should be the timeframe for assessment. The Building Act talks about 50 years, and says nothing about a building lasting for 100 years. The zones will have a significant social and financial impact on Okuru Residents as property values will fall and people will be unable to sell. We consider the NIWA report is based on flawed methodology, and does not consider	Amend the severe and coastal hazard alert zones at Okuru to address the matters raised in the submission.

				the unique geography. Erosion at Okuru is largely caused by river action within the estuary not sea wave action. Any prediction 50 to 100 years into the future is bound to be wrong. The NIWA report did not include any consultation with landowners or consider risk mitigation	
Michael Snowden (S492)	S492.005	Natural Hazards Rules	Amend	The rules will severely impact on the community of Okuru. Amending the rules would provide a way to allow the residents to stay in a community they enjoy.	<p>Introduce more certainty into the rules by:</p> <ul style="list-style-type: none"> • Providing for alternative and acceptable building models eg foundations on poles with set height limits such as 1.2m • Allow for removable dwellings in the event of erosion • Engage professional engineers to design an acceptable solution for dwellings to be raised 1.2m • waive HIRB constraints. • allow for expansion of services to the dwelling within a set area.
Michael Snowden (S492)	S492.006	Natural Hazards Rules	Amend	Natural hazards forecasts are inherently uncertain.	Amend the rules so that planners have discretion in applying the hazard zones to take into account nuanced situations of specific sites.

Michael Snowden (S492)	S492.007	Natural Hazards	Amend	This creates negative emotional triggers	Remove any reference to a 'red zone" in TTPP
Michael Snowden (S492)	S492.008	Natural Hazards	Amend		Adopt a more realistic timeframe for assessment of coastal hazards than 100 years
Michael Snowden (S492)	S492.009	Natural Hazards	Amend		include a method to actively engage with community on mitigation strategies for specific local hazard threats. eg local rating fund or joint investment programme.
Michael Snowden (S492)	S492.010	SUB - S1	Oppose	This is an inefficient use of land as 4ha is too small for productive use. The West Coast urgently needs more building sites.	Either keep the rural subdivision minimum lot size as it is, or only double it to 1ha per lot.
Michael Snowden (S492)	S492.011	ECO - P1	Amend	Landowners cannot plan for their business if SNA assessments are done at the time of resource consent,.	Undertake work to identify SNAs in Westland and Buller Districts.
Michael Snowden (S492)	S492.012	Ecosystems and Indigenous Biodiversity	Amend	The imposition of an SNA without compensation being offered is expropriation of private property.	Provide for a comprehensive range of non-regulatory assistance to SNA landowners including rates relief, support for fencing and covenants and land swaps with DOC.
MIKE GREER FAMILY TRUST AND DANIEL CHIMA	S530.001	Sites and Ares of Significance to Māori	Amend	It is unclear why SASM 79 extends beyond the foreshore of Cashmere Bay to include the Submitters land and other property shown in the map in the submission. To the	Amend the maps to reduce the area of SASM 79 so it excludes the foreshore of Cashmere Bay, Lake Brunner, and excludes the dry land and private properties beyond the foreshore of Cashmere Bay

TRUST (S530)				knowledge of the Submitters there are no sites of cultural significance on or beyond the foreshore of Cashmere Bay.	
MIKE GREER FAMILY TRUST AND DANIEL CHIMA TRUST (S530)	S530.002	Sites and Areas of Significance to Māori Rules	Support	Further, the absence of any SASM rules applicable to SASM 79 suggests that land on or beyond the foreshore is not intended to be included in the SASM 79 overlay shown on planning maps.	Retain the provisions whereby no specific rules apply to SASM 79
Mills Family Trust (S427)	S427.001	Natural Hazards	Oppose	I wish to make a submission against the large area of land between the Nelson Creek and the Red Jacks Creek that has been included in the flood zone area. I have a 41hec block of land of terrace formation above the Nelson Creek Road to the South which is approximately 40m above the Nelson Creek. A further 4 hectares of terrace land on the northern side of Nelson Creek Road which is approximately 5m above Nelson Creek. There is no way of either of this two areas ever been flooded and this large area between Nelson Creek and Red Jacks Creek needs to be looked at again. It	Remove the flood plain overlay over the land on two terraces above Nelson Creek Road

				appears that noone has physically looked at this large area.	
Minerals West Coast (S569)	S569.001	Whole plan	Support	minerals prospecting, exploration, mining, processing and related activities are important to the region's economic, social and cultural framework	Retain
Minerals West Coast (S569)	S569.002	Mineral Extraction	Amend	Uphold and provide for the Objectives of the TTPP as regards minerals activities.	Amend to clarify do the plan provisions uphold and provide for the Objectives of the TTPP as regards minerals activities Amend TTPP for consistency of wording between different sections, and thereby support Objectives, Policies and Rules relating to minerals prospecting, exploration and extraction.
Minerals West Coast (S569)	S569.003	BCZ - P3	Amend	What is "best practice"?	Amend to clarify the term best practice
Minerals West Coast (S569)	S569.004	BCZ - P5	Amend	that support is contingent on the meaning of "original condition".	Amend to clarify the meaning of "original condition".
Minerals West Coast (S569)	S569.005	Whole plan	Amend	Why apply different Objectives, Polices and Rules to mining and quarrying within the MINZ, and mining and quarrying outside of the MINZ.	Amend whole plan in respect of mining and quarry: <ul style="list-style-type: none"> Managing impacts on significant indigenous vegetation and significant habitats of indigenous fauna.

					<ul style="list-style-type: none"> Where the removal of an area of significant indigenous vegetation or significant fauna habitat in whole or in part is necessary to provide for mineral extraction and processing activities and cannot be avoided, adverse effects should be mitigated, remedied, offset, or compensated to achieve no net loss in biodiversity values.
Minerals West Coast (S569)	S569.006	ECO - P2	Oppose	This provision is unworkable for mining and quarrying.	Delete
Minerals West Coast (S569)	S569.007	ECO- O2	Support		REtain
Minerals West Coast (S569)	S569.008	ECO - P9	Support	Operators can manage these effects under the effects management hierarchy.	Retain
Minerals West Coast (S569)	S569.009	NOSZ - R16	Amend	The effects management hierarchy applies	Amend mining should be classified as a discretionary activity.
Minerals West Coast (S569)	S569.010	OSZ - Open Space Zone Rules	Support	Is enabling of minerals activities, in principle.	Retain

Minerals West Coast (S569)	S569.011	OSZ - R22	Support	This provides consistency between the OSZ provisions and Rural Zones (RURZ) provisions.	Retain
Minerals West Coast (S569)	S569.012	BCZ - R2	Amend	We urge council planners to understand the implications of making explicit reference to the freshwater regulations in TTPP.	Delete Advice note 3.
Minerals West Coast (S569)	S569.013	NFL - P5	Amend	Demands careful consideration.	Amend to replace the word “minimise” by the effects management hierarchy
Minerals West Coast (S569)	S569.014	CE - O1	Amend	must be consistent with the New Zealand Coastal Policy Statement.	Delete term
Minerals West Coast (S569)	S569.015	CE - O3	Amend		Amend to read To provide for activities which have a locational , functional, technical and operational need...
Minerals West Coast (S569)	S569.016	CE - P3	Amend	Is a preservation provision.	We urge council planners to exercise care in defining outstanding natural features and landscapes.
Minerals West Coast (S569)	S569.017	SASM -R6	Support	Minerals West Coast supports TTPP provisions concerning pounamu and aotea (bluestone).	Retain
Minerals West Coast (S569)	S569.018	SASM -R7	Support	Minerals West Coast supports TTPP provisions concerning pounamu and aotea (bluestone).	REtain

Minerals West Coast (S569)	S569.019	SASM -R8	Support	Minerals West Coast supports TTPP provisions concerning pounamu and aotea (bluestone).	Retain
Minerals West Coast (S569)	S569.020	SASM - P6	Amend	Adversely affect those alluvial gold miners who are non-Māori and mine pounamu as a by-product for local iwi under an arrangement between the parties	Within the Pounamu and Aotea Management overlay, enable tino rangatiratanga and kaitiakitanga of the pounamu and aotea resource by Poutini Ngāi Tahu, or their authorised representatives or contractors , and avoid the disturbance or removal of this resource by non-hapū members.
Minerals West Coast (S569)	S569.021	POU - P6	Support	Minerals West Coast supports TTPP provisions concerning pounamu and aotea (bluestone).	Retain
Minerals West Coast (S569)	S569.022	SASM - R15	Amend	To allow existing arrangements between Ngāi Tahu iwi and alluvial gold miners to endure.	...,or, 2. An arrangement between Ngai Tahu iwi and alluvial gold miners is in place.
Minerals West Coast (S569)	S569.023	SASM - R15	Amend	There often is a concurrence of the two, pounamu and alluvial gold, as they are found in the same places as a result of the same geological processes.	Amend activity status to discretionary
Minerals West Coast (S569)	S569.024	Tangata Whenua-TeTangata Whenua	Support	Minerals West Coast supports TTPP provisions (eg page 71ff) concerning pounamu and aotea (bluestone).	Retain
Minerals West Coast (S569)	S569.025	SETZ - R15	Amend	Illogical to enable prospecting and exploration, but the same provisions classify mining as non-complying.	Amend to include mineral extraction

Minerals West Coast (S569)	S569.026	SETZ - R23	Amend	Illogical to enable prospecting and exploration, but the same provisions classify mining as non-complying.	Amend to make mineral extraction a permitted activity
Minerals West Coast (S569)	S569.027	FUZ - R9	Amend	Illogical to enable prospecting and exploration, but the same provisions classify mining as non-complying.	Amend to include mineral extraction.
Minerals West Coast (S569)	S569.028	Overview	Support	able responsible minerals activities	Retain
Minerals West Coast (S569)	S569.029	RLZ - R11	Amend	Illogical to enable prospecting and exploration, but the same provisions classify mining as non-complying.	Amend to include mineral extraction.
Minerals West Coast (S569)	S569.030	RLZ - R25	Amend	Illogical to enable prospecting and exploration, but the same provisions classify mining as non-complying.	Amend to make mineral extraction a permitted activity
Minerals West Coast (S569)	S569.031	ASW - R2	Amend	the rules for activities on the surface of water should clearly exclude suction dredging activities	Add 1. b. vii. Suction dredging for gold mining
Minerals West Coast (S569)	S569.032	RURZ - O5	Amend	At issue is that “minimise” is not defined, is ultra vires.	Amend: ...that provided adverse effects are avoided, remedied, mitigated, offset and/or compensated and rehabilitation of land occurs ...
Minerals West Coast (S569)	S569.033	RURZ - P19	Amend	At issue is that “minimise” is not defined, is ultra vires.	Amend: ...that provided adverse effects are avoided, remedied, mitigated, offset and/or compensated and rehabilitation of land occurs ...
Minerals West Coast (S569)	S569.034	OSRZ - P14	Support		Retain

Minerals West Coast (S569)	S569.035	CE - O3	Amend	“minimise” is not defined, term is ultra vires.	Amend: ... impacts on natural character, landscape, natural features, access and biodiversity values are avoided, remedied, mitigated, offset and/or compensated.
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Minerals West Coast (S569)	S569.036	RURZ - P25	Amend	The full effects management hierarchy should apply.	Amend d. Avoiding, Avoiding, remedying, mitigating, offsetting and/or compensating for. impacts on significant indigenous vegetation and significant habitats of indigenous fauna;
Minerals West Coast (S569)	S569.037	Whole plan	Amend	applying the effects management hierarchy throughout TTPP	Amend to apply the effects management hierarchy throughout TTPP where required.
Minerals West Coast (S569)	S569.038	RURZ - P18	Amend	Inconsistent wording	Amend: Recognise that mineral resources are fixed in location and mineral extraction activities have a functional, technical, operational or locational need to be sited in the particular location provided adverse effects are avoided, remedied, mitigated, offset or compensated.
Minerals West Coast (S569)	S569.039	OSRZ - P14	Support		Retain
Minerals West Coast (S569)	S569.040	OSRZ - P9	Amend	Inconsistent wording	Amend f: Mineral extraction of resources where these are limited in their location, and have a functional, technical, operational or locational need to be sited in the particular location,

Minerals West Coast (S569)	S569.041	OSRZ - P14	Support	consistency of wording, OSRZ P14, RURZ P22, P25	Retain
Minerals West Coast (S569)	S569.042	RURZ - P22	Amend	consistency of wording, OSRZ P14, RURZ P22, P25	Sites used for mineral extraction are rehabilitated at the end of the mineral extraction activity to enable the land to be used for an appropriate activity.
Minerals West Coast (S569)	S569.043	RURZ - P25	Amend	consistency of wording, OSRZ P14, RURZ P22, P25	Amend h. Requiring sites are rehabilitated at the end of the mineral extraction activity to enable the land to be used for an appropriate activity.
Minerals West Coast (S569)	S569.044	Whole plan	Amend	TTPP needs to provide for minerals activities to avoid adverse effects via the effects management hierarchy, to it to be logically consistent, and to achieve its Objectives.	Amend to provide for minerals activities to avoid adverse effects via the effects management hierarchy, to it to be logically consistent, and to achieve its Objectives.
Minerals West Coast (S569)	S569.045	Whole plan	Support	Provides for past, present, and future mineral extraction in Tai Poutini West Coast region.	REtain
Minerals West Coast (S569)	S569.046	Whole plan	Support	TTPP should provide for minerals activities to access the “effects management hierarchy”	Amend plan to provide for effect management hierarchy in regard to mineral extraction.
Minerals West Coast (S569)	S569.047	Buller Coalfield Zone	Support	coal resources are extensive in area and are well documented.	Retain
Minerals West Coast (S569)	S569.048	Mineral Extraction Zone	Amend	Zoning is not an appropriate planning solution for minerals activities except existing operations	Amend to classify mineral extraction in zones as permitted, controlled, restricted discretionary or discretionary activities – except in towns and airports etc.

Minerals West Coast (S569)	S569.049	SCHED9 - LAWFULLY ESTABLISHED MINERAL EXTRACTION AND PROCESSING AREAS	Support		Retain
Minerals West Coast (S569)	S569.050	Schedule Ten:Previously Mined Locations in the Rural and Open Space and Recreation Zones	Support		Retain
Ministry of Education Te Tāhuhu o Te Mātauranga (S456)	S456.001	EDUCATIONAL FACILITY	Support	The proposed definition for Educational Facility is consistent with the National Planning Standards, which the Ministry was involved in developing.	Retain as proposed.
Ministry of Education Te Tāhuhu o Te Mātauranga (S456)	S456.002	HABITABLE ROOM	Support	The draft definition for Habitable Room is consistent with the National Planning Standards, which the Ministry was involved in developing.	Retain as proposed.
Ministry of Education Te Tāhuhu o Te	S456.003	SENSITIVE ACTIVITY	Support	The Ministry supports the inclusion of Educational Facilities in the definition of “Sensitive Activity”.This proposed definition is acceptable	Retain as proposed.

Mātauranga (S456)				and provides protection to Educational Facilities.	
Ministry of Education Te Tāhuhu o Te Mātauranga (S456)	S456.004	STADIUM ACTIVITY	Support in part	The Ministry supports the inclusion of childcare facilities in the definition of “Stadium Activity”, however seeks inclusion of educational facilities which encompasses childcare facilities. It is noted that Greymouth High School partially falls within the Stadium Zone, as such, inclusion of the educational facilities within the definition is considered appropriate.	Amend as follows: the use of land and/or buildings where the principal activities relate to the function of the facilities in the Stadium Zone. These include, but are not limited to: Sport and recreation activity and events Cultural, entertainment and exhibition activities including music festivals, concerts and performances Trade fairs, market days and displays Conference, meetings and functions including weddings Sports and cultural activity related education Museum facilities After school/holiday programmes educational facilities Physiotherapy and massage Retail activities including café or retail sales that are ancillary to other activities on the site Any ancillary activities necessary for the functioning of the facility, including ancillary office activity and ticket sales.
Ministry of Education Te Tāhuhu o Te Mātauranga (S456)	S456.005	UFD - O1	Support in part	The Ministry requests that explicit provision is given to educational facilities throughout the district in urban development, to manage the impacts of development on educational facilities, in particular	1. Urban form and development - Te āhua me te whanaketanga o te tāone To have urban environments and built form on the West Coast/Tai o Poutini that: Are attractive to residents, business and visitors;

				<p>impacts on school capacity. Council has an obligation under the National Policy Statement for Urban Development (NPS-UD) to ensure sufficient additional infrastructure (which includes schools) is provided in urban growth and development (see Policy 10 and 3.5 of Subpart 1 of Part 3: Implementation, in particular). The Ministry would also request consequent consideration of provisions for educational facilities in urban development provisions generally.</p>	<p>Have areas of special character and amenity value identified and their values maintained; Support the economic viability and function of town centres; Recognise the risk of natural hazards whereby new development is located in less hazardous locations; Promote the re-use and re-development of buildings and land, including private and public land; Support inclusivity and housing choice for the diversity within the community now and into the future; Improve overall accessibility and connectivity for people, transport (including opportunities for walking and cycling) and services; Promote the safe, efficient and effective provision and use of infrastructure, including the optimisation of the use of existing infrastructure; Maintain the health and wellbeing of waterbodies, freshwater ecosystems and receiving environments; Protect and enhance the distinctive character of the districts' settlements; and Provide for educational facilities throughout the districts' to support communities and development.</p>
<p>Ministry of Education Te Tāhuhu o Te Mātauranga (S456)</p>	S456.006	TRN - O3	Support	<p>The Ministry supports this objective as it promotes a safe, efficient and integrated transport network for the District including for active transport.</p>	<p>Retain as proposed.</p>

Ministry of Education Te Tāhuhu o Te Mātauranga (S456)	S456.007	TRN - P1	Support	The Ministry supports the promotion of safe and efficient transport networks that meet the needs of all transport users.	Retain as proposed.
Ministry of Education Te Tāhuhu o Te Mātauranga (S456)	S456.008	TRN - P8	Support	The Ministry supports this policy as it promotes public health and community wellbeing through safe transport network for the District. This policy aligns with the Ministry's focus on encouraging active modes of transport for students and employees to and from Educational Facilities where possible.	Retain as proposed.
Ministry of Education Te Tāhuhu o Te Mātauranga (S456)	S456.009	TRN - P9	Support	The Ministry supports this policy as it promotes safe and efficient operation of the integrated transport network	Retain as proposed.
Ministry of Education Te Tāhuhu o Te Mātauranga (S456)	S456.010	TRN - R10	Support	The Ministry supports this policy as it promotes safe and efficient operation of the integrated transport network.	Retain as proposed.
Ministry of Education Te Tāhuhu o Te	S456.011	TRN - R12	Support	The Ministry supports the need for traffic assessments where an activity	Retain as proposed

Mātauranga (S456)				meets the qualifiers set out in Table TRN-6,	
Ministry of Education Te Tāhuhu o Te Mātauranga (S456)	S456.012	TRNS6	Support in part	The Ministry acknowledges that Education Facilities can result in high volumes of traffic, however the qualifiers specified in Table TRN-6 are low comparatively. The Ministry supports the inclusion of education facilities within TRN-6 however requests that the qualifiers are raised, particularly given the number of students is not an accurate reflection of traffic movements. The qualifiers proposed are consistent with other District Plans within Te Waipounamu.	<p>The Ministry requests that the qualifier for ‘Education – Schools’ is increased. Based on the data included in the Waka Kotahi ‘Research Report 453 Trips and parking related to land use’, 30 students would only result in 96 daily and 42 peak hour vehicle trips. The aforementioned traffic movements are based on the presumption that every pupil is driven to school in a vehicle carrying one student only. In reality, schools are often accessible by various transport modes including bicycle, bus, and walking. This combined with multiple students travelling in the same vehicle further reduces the traffic movements. As such, the Ministry requests that the qualifier for ‘Education – Schools’ is 100 students.</p> <p>Amend as follows: Activity, Qualifier Childcare including preschool, kindergarten and play centre, 25 children Education - Schools, 100 students Education - Tertiary, 150 FTE students Industrial , 5,000m2 Gross Floor Area Mining and Quarrying, >30 heavy vehicle movements per day</p>

					Warehousing and distribution , 6,500m2 Gross Floor Area Healthcare, 300m2 Gross Floor Area Office, 2,000m2 Gross Floor Area Residential , 20 residential sites / units Retail – Shops and supermarkets, 250m2 Gross Floor Area Retail – Large Format and Bulk Goods, 500m2 Gross Floor Area Service Stations, 2 filling pumps Mixed use or other activities not otherwise listed in this Table, 60 vehicle movements
Ministry of Education Te Tāhuhu o Te Mātauranga (S456)	S456.013	TRNTable 5	Support	The Ministry supports the encouragement of active transport modes such as cycling, walking and the overall encouragement of cycle parking.	Retain as proposed.
Ministry of Education Te Tāhuhu o Te Mātauranga (S456)	S456.014	HS - P4	Support	The Ministry supports that sensitive activities such as educational facilities should not be located adjacent to significant hazardous facilities. The Ministry’s feedback on the draft provision has been adopted, changing the original wording from ‘ in proximity’ to ‘adjacent’	Retain as proposed
Ministry of Education Te	S456.015	Natural Hazards	Support	The Ministry acknowledges the risk that natural hazards pose a potential	Retain as proposed.

Tāhuhu o Te Mātauranga (S456)				risk to the safety of children and to their assets, however recognises that at times there is a functional need to locate within these areas, particularly to serve existing communities.	
Ministry of Education Te Tāhuhu o Te Mātauranga (S456)	S456.016	NH - R10	Support	The Ministry acknowledges the risk that flooding poses to their assets and considers the setting of a minimum finished floor level will mitigate potential and actual effects on the Ministry's assets in flooding events.	Retain as proposed.
Ministry of Education Te Tāhuhu o Te Mātauranga (S456)	S456.017	NFL - P1	Support	The Ministry supports this policy as it provides for existing land uses and lawfully established activities, which can include educational facilities.	Retain as proposed.
Ministry of Education Te Tāhuhu o Te Mātauranga (S456)	S456.018	SUB - O2	Support in part	The Ministry support this objective as it enables subdivision, however the Ministry requests that specific provision for educational facilities is provided to ensure that population growth and the impact on schools is considered within developments.	Amend as follows: Subdivision occurs in locations and at a rate that: Is supported by the capacity of infrastructure networks, or provides for infrastructure facilities and networks that are sufficient to accommodate growth and development that meets the standards required by the Council and the Plan;

					<p>Facilitates the operation of critical infrastructure; Enables access and connectivity; Provide for the health, wellbeing and safety of the West Coast/Tai o Poutini community; Enables growth and development to be supported by educational facilities Provides for growth and expansion of West Coast/Tai o Poutini settlements and businesses; and Avoids significant natural hazards and are built to be resilient to natural hazards.</p>
Ministry of Education Te Tāhuhu o Te Mātauranga (S456)	S456.019	CE - O3	Support in part	<p>The Ministry recognises that activities have a functional need to be located within the coastal environment. However, the Ministry request that operational need is included as educational facilities have an operational need to be located within coastal environments. This inclusion would also be consistent with CE-P5.</p>	<p>Amend as follows To provide for activities which have an operational and functional need to locate in the coastal environment in such a way that the impacts on natural character, landscape, natural features and biodiversity values are minimised.</p>
Ministry of Education Te Tāhuhu o Te Mātauranga (S456)	S456.020	CE - P5	Support	<p>The Ministry recognises a functional need for educational facilities to provide for communities in coastal environments.</p>	<p>Retain as proposed.</p>
Ministry of Education Te Tāhuhu o Te	S456.021	CE - P6	Support in part	<p>The Ministry recognises the need for expansion of towns and settlements and considers that this should only</p>	<p>Recognise that there are existing settlements and urban areas located within the coastal environment of the West Coast/Tai o Poutini including parts of</p>

<p>Mātauranga (S456)</p>				<p>occur where growth would be supported by the required infrastructure including educational facilities.</p>	<p>Westport, Greymouth and Hokitika and enable new subdivision, buildings and structures within and expansion of towns and settlements where:</p> <p>These are located in areas already modified by built development or primary production activities, or Where located in unmodified areas, any adverse impact on natural character can be mitigated;</p> <p>There is sufficient infrastructure capacity to service growth, including educational facilities</p> <p>In areas of outstanding or high natural character: Provide for lawfully established land uses and activities to continue; Allow for other uses with a functional need to locate in the coastal environment Allow for Poutini Ngāi Tahu cultural uses; Avoid encroachment into unmodified areas of the coastal environment; and Ensure subdivision and development is of a scale and design where adverse effects on the elements, patterns and processes that contribute to natural character are minimised.</p>
<p>Ministry of Education Te Tāhuhu o Te</p>	<p>S456.022</p>	<p>OSRZ - Open Space and Recreation Zones Objectives</p>	<p>Support</p>	<p>The Ministry support Objective OSRZ-01 as it recognises that certain development and activities such as educational facilities support</p>	<p>Retain as proposed.</p>

Mātauranga (S456)				the function of local communities in the Open Space and Recreation Zones and surrounding environment.	
Ministry of Education Te Tāhuhu o Te Mātauranga (S456)	S456.023	OSRZ - Open Space and Recreation Zones Policies	Support	The Ministry support Objective OSRZ-01 as it recognises that certain development and activities such as educational facilities support the function of local communities in the Open Space and Recreation Zones and surrounding environment.	Retain as proposed.
Ministry of Education Te Tāhuhu o Te Mātauranga (S456)	S456.024	NOSZ - R2	Support	The Ministry supports these rules to manage the operation of educational facilities in the NOSZ. It is noted that the amendment requested by the Ministry for clarity of Education Facilities has been accepted.	Retain as proposed.
Ministry of Education Te Tāhuhu o Te Mātauranga (S456)	S456.025	NOSZ - R9	Support in part	The Ministry supports these rules to manage the operation of educational facilities in the NOSZ, however request that educational facilities and research facilities are provided for as separate terms for clarification purposes.	a. Amend as follows: NOSZ – R9 Recreational Activities, Conservation Activities, Educational Facilities and Research Facilities, Poutini Ngāi Tahu Activities, Parks Facilities and Parks Furniture not meeting Permitted Activity Standards. Activity Status: Restricted Discretionary Discretion is restricted to: Design, position and location of any buildings;

					Landscape measures; Vehicle access and parking design and location; and Management of effect on natural character, landscape, historical and cultural values and biodiversity values.
Ministry of Education Te Tāhuhu o Te Mātauranga (S456)	S456.026	OSZ - R5	Support	The Ministry supports these rules to manage the operation of educational facilities in the OSZ. It is noted that the amendment requested by the Ministry for clarity of Education Facilities has been accepted.	Retain as proposed.
Ministry of Education Te Tāhuhu o Te Mātauranga (S456)	S456.027	OSZ - R14	Support	The Ministry supports these rules to manage the operation of educational facilities in the OSZ. It is noted that the amendment requested by the Ministry at the draft stage has been accepted.	Retain as proposed.
Ministry of Education Te Tāhuhu o Te Mātauranga (S456)	S456.028	SARZ - R5	Support	The Ministry supports these rules to manage the operation of educational facilities in the SARZ. It is noted that the amendment requested by the Ministry for clarity of Education Facilities has been accepted.	Retain as proposed.
Ministry of Education Te Tāhuhu o Te	S456.029	SARZ - R11	Support	The Ministry supports these rules to manage the operation of educational facilities in the SARZ; however request that educational facilities	Amend as follows. SARZ - R11 Recreational Activities, Conservation Activities, Community Facilities, Educational Facilities and Research Activities, Clubrooms,

Mātauranga (S456)				and research facilities are provided for as separate terms for clarification purposes.	Grandstands and Poutini Ngāi Tahu Activities not meeting Permitted Activity rules Activity Status Restricted Discretionary Discretion is restricted to: Design, position and location of any buildings; Landscape measures; Hours of Operation; Vehicle access and parking design and location; and Management of effects on natural character, landscape, historical and cultural values and biodiversity values. Activity status where compliance is not achieved: N/A
Ministry of Education Te Tāhuhu o Te Mātauranga (S456)	S456.030	Commercial and Mixed Use Zones - Objectives and Policies	Support	The Ministry support Objective CMUZ - O1 as it enables other activities to support the local community such as educational facilities.	Retain as proposed.
Ministry of Education Te Tāhuhu o Te Mātauranga (S456)	S456.031	Commercial and Mixed Use Zones - Objectives and Policies	Support	The Ministry support Policy CMUZ - P2 as it anticipates activities which meet the needs of local communities, such as educational facilities, with convenient access.	Retain as proposed.
Ministry of Education Te Tāhuhu o Te	S456.032	Commercial and Mixed Use Zones - Objectives and Policies	Support	The Ministry support Policy CMUZ – P16 as it provides for community facilities, such as educational	Retain as proposed.

Mātauranga (S456)				facilities, which serve the immediate and local community.	
Ministry of Education Te Tāhuhu o Te Mātauranga (S456)	S456.033	COMZ - R1	Support in part	<p>The Ministry support Rule COMZ - R1 as it provides for educational facilities in the Commercial Zone as a permitted activity assuming performance standards are complied with. The Ministry considers that educational facilities should be provided for in this zone as educational facilities are considered essential social infrastructure. The Ministry support the activity status of Restricted Discretionary where standards 4 and 5 are not complied with. However, the Ministry requests an activity status of restricted discretionary where compliances is not achieved with standards 1 -4. This provides flexibility without unreasonable restrictions for educational facilities that may be best places within the commercial zone to serve the education needs of commercial areas.</p>	<p>Amend as follows</p> <p>COMZ - R1 Commercial Activities, Community Facilities, Educational Facilities and Visitor Accommodation Activities and Buildings</p> <p>Activity Status Permitted Where:</p> <p>The maximum height above ground level is 12 metres except that this standard does not apply to hose drying towers at Emergency Service Facilities Any building or structure is set back: 3m from any RESZ – Residential Zone or OSRZ – Open Space and Recreation Zone; and 3m from the road boundary except for; site with frontage to two roads in the COMZ – Commercial Zone can have a 3m setback on one road boundary and 1.5m set back on the other road boundary; Landscaping shall be provided as follows: The area adjoining the road frontage of all sites shall contain a minimum 1.5m landscaping strip that will, within two years of being planted, reach a minimum height of 1m; On sites adjoining a RESZ - Residential Zone a 2m wide landscaping strip shall be provided adjacent to the RESZ - Residential Zone boundary and shall be planted</p>

					<p>with species, which at maturity, will screen the buildings from the adjoining sites; and</p> <p>The planting of 1 tree per 20 carparking spaces is encouraged within any carparking area.</p> <p>Stormwater facilities that provide water quality treatment and landscape amenity, should be incorporated into landscaped areas, where practicable, to achieve effective stormwater management in an integrated manner.</p> <p>The maximum building length is 20m where this abuts a RESZ – Residential Zone;</p> <p>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; and</p> <p>No building projects beyond a building envelope defined by a recession plane as defined in Appendix Two to commence 2.5m above any site boundary except where neighbouring property owner’s written approval is provided to the Council at least 10 working days prior to the works commencing. This standard does not apply to:</p> <ul style="list-style-type: none">Road boundaries;Buildings on adjoining sites that have a common wall along the boundary;Boundaries abutting an access lot or right of way in which case the furthest boundary of the access lot or right of way may be used for assessing compliance
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					<p>with this standard.;</p> <p>Antennas, aerials, satellite dishes (less than 1m in diameter), chimneys, flues and architectural features (eg finials, spires) provided these do not exceed the recession plane by more than 3m vertically;</p> <p>Solar panels and solar water heaters provided these do not exceed the height in relation to boundary plane by more than 0.25m vertically.</p> <p>Advice Notes:</p> <p>Any landscaping required by this rule may be located in common areas, where the development comprises land and/or buildings in separate unit titles.</p> <p>The acoustic insulation requirements for noise sensitive activities as set out in Rule NOISE - R3 also apply.</p> <p>Activity status where compliance is not achieved: Restricted Discretionary Discretion is restricted to: Design, position and location of any buildings; Landscape measures; Hours of Operation; Vehicle access and parking design and location; and Management of effects on natural character, landscape, historical and cultural values and biodiversity values. Visual impact on the amenity of the adjoining residential zone.</p>
Ministry of Education Te	S456.034	COMZ - R8	Oppose	The Ministry opposes this rule COMZ -R8 to manage the operation of	Amend as follows:

<p>Tāhuhu o Te Mātauranga (S456)</p>				<p>educational facilities in the Commercial Zone The Ministry considers that educational facilities should be provided for in this zone as educational facilities are considered essential social infrastructure. The Ministry request that educational facilities are managed as outlined in COMZ-R1 with a permitted activity status and restricted discretionary when compliance is not achieved.</p>	
<p>Ministry of Education Te Tāhuhu o Te Mātauranga (S456)</p>	<p>S456.035</p>	<p>MUZ - R1</p>	<p>Support in part</p>	<p>The Ministry support Rule MUZ-R1 in part as it provides for community activities in the Mixed Use Zone as a permitted activity. However the Ministry request that the activity status of restricted discretionary where compliance is not achieved. This provides flexibility without unreasonable resturctions for education facilities that may be best placed in the Mixed Used Zone to serve the education needs of the Mixed Use area</p>	<p>Amend as follows</p> <p>Activity Status: Permitted</p> <p>Where:</p> <p>This is not visitor accommodation subject to Rule MUZ – R5;</p> <p>Performance standards for Rule MUZ – R1 are complied with; and</p> <p>This is not a commercial garage, service station or emergency service activity located on a Façade Control Street.</p> <p>Activity status where compliance is not achieved: Restricted Discretionary</p> <p>Discretion is restricted to Design, position and location of any buildings;</p>

					<p>Landscape measures; Hours of Operation; Vehicle access and parking design and location; and Management of effects on natural character, landscape, historical and cultural values and biodiversity values.</p>
<p>Ministry of Education Te Tāhuhu o Te Mātauranga (S456)</p>	S456.036	NCZ - R1	Support in part	<p>The Ministry request that educational facilities are specifically provided for as a permitted activity as they play an important role in servicing the community. The Ministry considers that educational facilities should be provided for in this zone as educational facilities are considered essential social infrastructure. The Ministry support the activity status of Restricted Discretionary where standards 9-12 are not complied with. However, the Ministry requests an activity status of restricted discretionary where compliances is not achieved with standards 1 -8. This provides flexibility without unreasonable restrictions for educational facilities that may be best places within the neighbourhood centre zone to serve</p>	<p>a. Amend as follows:</p> <p>NC1-R1 Commercial, Community and Visitor Accommodation Activities, Educational Facilities and Buildings Activity Status Permitted Where: Community Facilities, Emergency Services Facilities, retail and office activities are a maximum of 250m2 gross floor area per activity provided; The activity does not include: Drive through restaurants; Service stations; Motor vehicle sales; Yard-based retail activities; Trade retail and trade suppliers; or Bars/taverns; The maximum height above ground level is 10 metres except that this standard does not apply to hose drying towers at Emergency Service Facilities; External storage is screened by a 1.8m fence or landscaping so that it is not visible from any adjoining</p>

			<p>the education needs of commercial areas.</p>	<p>residential zone boundary or adjoining public place; Maximum site coverage is 60%; No more than one heavy vehicle is stored on the site; The activity shall be limited to the following hours of operation: 6am – 11pm weekdays; and 7am – 10 pm weekends and public holidays; except where The entire activity is located within a building; and There are no visitors, customers or deliveries outside the above hours. The maximum building length is 20m where this abuts a RESZ - Residential Zone; Any building or structure is set back 2m from a RESZ - Residential Zone or OSRZ - Open Space and Recreation Zone boundary; 3m from the road boundary; or For sites with frontage to two roads in the NCZ - Neighbourhood Centre Zone: 3m on one road boundary; and 1.5m on the other road boundary; 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; No building shall protrude beyond a building envelope defined by a recession plane as outlined in Appendix Two to commence 2.5m above any residential site</p>
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				<p>boundary except where neighbouring property owner's written approval is provided to the Council 10 working days to the works commencing...</p> <p>This standard does not apply to: Road boundaries; Buildings on adjoining sites that have a common wall along the boundary; Boundaries abutting an access lot or right of way in which case the furthest boundary of the access lot or right of way may be used for assessing compliance with this standard; Antennas, aerials, satellite dishes (less than 1m in diameter), chimneys, flues and architectural features (e.g. finials, spires) provided these do not exceed the recession plane by more than 3m vertically; or Solar panels and solar water heaters, provided these do not exceed the height in relation to boundary plane by more than 0.25m vertically.</p> <p>Advice Note: The acoustic insulation requirements for noise sensitive activities as set out in Rule NOISE - R3 also apply.</p> <p>Activity status where compliance not achieved: Restricted Discretionary Discretion is restricted to: Design and location of buildings;</p>
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					Design and location of parking, loading and access areas; Landscape measures
Ministry of Education Te Tāhuhu o Te Mātauranga (S456)	S456.037	GIZ - R14	Support	The Ministry supports this rule GIZ-R14 to manage educational facilities in the General Industrial Zone.	Retain as proposed.
Ministry of Education Te Tāhuhu o Te Mātauranga (S456)	S456.038	LIZ - R14	Support in part	The Ministry supports this rule LIZ-R14 in part to manage educational facilities in the Light Industrial Zone. The Ministry considers that educational facilities should be provided for in this zone as educational facilities are considered essential social infrastructure. The Ministry requests an activity status of restricted discretionary. This provides flexibility without unreasonable restrictions for educational facilities that may be best places within the Light Industrial Zone to serve the education needs of commercial areas.	Amend as follows: LIZ – R14 Community Facilities and Educational Facilities Activity Status: Discretionary Restricted Discretionary Discretion is restricted to: Design, position and location of any buildings; Landscape measures; Hours of Operation; Vehicle access and parking design and location; and Management of effects on natural character, landscape, historical and cultural values and biodiversity values. Activity status where compliance is not achieved: N/A Discretionary
Ministry of Education Te Tāhuhu o Te	S456.039	RESZ - O3	Support	The Ministry support Objective RESZ-O3 as it provides for a range of non-residential activities such as	Retain as proposed.

Mātauranga (S456)				educational facilities to meet the needs of local communities with convenient access.	
Ministry of Education Te Tāhuhu o Te Mātauranga (S456)	S456.040	RESZ - P4	Support	The Ministry support Policy RESZ-P4 as it enables non-residential activities such as educational facilities to meet the needs of local communities with convenient access.	Retain as proposed.
Ministry of Education Te Tāhuhu o Te Mātauranga (S456)	S456.041	GRZ - R7	Support in part	The Ministry supports these rules in part to manage the operation of educational facilities, however the Ministry considers that educational facilities would be unreasonably restricted with the vehicle movement standard. The Ministry request the following amendments to the performance standards to reflect more realistic standards for educational facilities which also aligns with the Ministry request to update Table 6 - High Trip Generating Activities in the Transport Chapter.	Amend as follows: GRZ-R7 Community Facilities and Educational Facilities Activity Status Permitted Where: All performance standards for Rules GRZ - R1, NOISE R1-R2 and R4, LIGHT - R3 and SIGN - R10 are complied with; Except for educational facilities, a maximum of 4 heavy vehicle movements and whichever is the greater of 20 light vehicle movements per day or 140 vehicle movements per week; and No external storage of products except those associated with residential use shall be visible from any residential zoned property or public place. For educational facilities, a maximum of 140 light vehicle movements per day are generated.
Ministry of Education Te Tāhuhu o Te	S456.042	GRZ - R14	Support	The Ministry supports these rules to manage the operation of educational	Retain as proposed.

Mātauranga (S456)				facilities in the General Residential Zone.	
Ministry of Education Te Tāhuhu o Te Mātauranga (S456)	S456.043	LLRZ - R7	Support in part	The Ministry supports these rules in part to manage the operation of educational facilities, however the Ministry considers that educational facilities would be unreasonably restricted with the vehicle movement standard. The Ministry request the following amendments to the performance standards to reflect more realistic standards for educational facilities which also aligns with the Minsitry request to update Table 6 - High Trip Generating Activities in the Transport Chapter.	<p>1. Amend as follows:</p> <p>LLRZ - R7 Community Facilities and Educational Facilities Activity Status Permitted Where: All performance standards for Rules GRZ - R1, NOISE R1-R2 and R4, LIGHT - R3 and SIGN - R10 are complied with; Except for educational facilities, A-a maximum of 4 heavy vehicle movements and whichever is the greater of 30 light vehicle movements per day or 210 vehicle movements per week; and No external storage of products except those associated with residential use shall be visible from any residential zoned property or public place. For educational facilities, a maximum of 210 light vehicle movements per day are generated.</p>
Ministry of Education Te Tāhuhu o Te Mātauranga (S456)	S456.044	LLRZ - R12	Support	The Ministry supports these rules to manage the operation of educational facilities in the Large Lot Residential Zone.	Retain as proposed.
Ministry of Education Te Tāhuhu o Te	S456.045	MRZ - R7	Support in part	The Ministry supports these rules in part to manage the operation of educational facilities, however the	<p>2. Amend as follows:</p> <p>MRZ - R7 Community Facilities and Educational</p>

Mātauranga (S456)				Ministry considers that educational facilities would be unreasonably restricted with the vehicle movement standard. The Ministry request the following amendments to the performance standards to reflect more realistic standards for educational facilities which also aligns with the Minsitry request to update Table 6 - High Trip Generating Activities in the Transport Chapter.	Facilities Activity Status Permitted Where: All performance standards for Rules GRZ - R1, NOISE R1-R2 and R4, LIGHT - R3 and SIGN - R10 are complied with; Except for educational facilities, A a maximum of 4 heavy vehicle movements and whichever is the greater of 20 light vehicle movements per day or 140 vehicle movements per week; and No external storage of products except those associated with residential use shall be visible from any residential zoned property or public place. For educational facilities, a maximum of 140 light vehicle movements per day are generated.
Ministry of Education Te Tāhuhu o Te Mātauranga (S456)	S456.046	MRZ - R12	Support	The Ministry supports these rules to manage the operation of educational facilities in the Medium Density Residential Zone.	Retain as proposed.
Ministry of Education Te Tāhuhu o Te Mātauranga (S456)	S456.047	RURZ - O1	Support	The Ministry support Objective RURZ-01 as it provides for a range of acitivities such as educational facilities to meet the needs of local communities and in turn support a productive rural working environment .	Retain as proposed.

Ministry of Education Te Tāhuhu o Te Mātauranga (S456)	S456.048	Rural Zones Policies	Amend	<p>The Ministry acknowledges that the primary purpose of the Rural Zone is to provide for primary production and compatible activities. However, the Ministry considers that educational facilities, particularly early childhood centres and schools, should be provided for where there is potential for a population to support them including in the Rural Zone. This will support active modes of transport and reduce trip lengths and times. They should be enabled in this zone as educational facilities are considered essential social infrastructure. The Ministry therefore request the following new policy educational facilities in the Rural Zone.</p>	<p>Add as follows under 'Non-Rural Activities' heading:</p> <p>RURZ – PX</p> <p>Provide for educational facilities as needed to support rural communities.</p>
Ministry of Education Te Tāhuhu o Te Mātauranga (S456)	S456.049	GRUZ - R14	Support in part	<p>The Ministry supports this Rule GRUZ-R14 to manage the operation of educational facilities in the General Rural Zone.</p>	<p>Retain as proposed.</p>
Ministry of Education Te Tāhuhu o Te	S456.050	RLZ - R10	Support in part	<p>The Ministry supports these rules in part to manage the operation of educational facilities in the Rural Lifestyle Zone. The Ministry</p>	<p>Amend as follows:</p>

<p>Mātauranga (S456)</p>				<p>requests a change in the activity status when compliance is not achieved to restricted discretionary to ensure that the consideration of effects is appropriately limited to matters of relevance.</p>	<p>RLZ – R10 Community Facilities, Educational Facilities, Emergency Service Facilities and Recreational Facilities</p> <p>Activity Status Permitted Where: All performance standard for Rule RLZ – R1, NOISE – R1, R2, and R4 and LIGHT – R1 and R3 are complied with; Hours of operation are limited to: 7am – 10pm weekdays; and 8am – 8pm weekends and public holidays; except For community halls lawfully established at the time of notification of the Plan; Hours of operation on Friday and Saturday are 7am – 12pm midnight; and No restriction on hours is in place for up to 12 days per calendar year.</p> <p>Advice Note: Where a noise sensitive activity is located within: 80 m of a State Highway with a speed limit of 70kph or greater; or 40m of a State Highway with a speed limit of less than 70kph; or 40m of a Railway Line ; or The 50 dBA Noise Contour Boundary of the Westport or Hokitika Airports or Greymouth or Karamea Aerodrome.</p>
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					<p>Then the Noise Insulation Requirements are set out in Rule NOISE – R3 will apply.</p> <p>Activity status where compliance not achieved: Restricted Discretionary</p> <p>Discretion is restricted to: The effect on rural character The effects on matters of reverse sensitivity</p> <p>Activity status where compliance is not achieved: Discretionary</p>
Ministry of Education Te Tāhuhu o Te Mātauranga (S456)	S456.051	SETZ - R12	Support	The Ministry supports these rules to manage the operation of educational facilities in the Settlement Zone. It is noted that amendments have been made to reflect more realistic standards for education facilities.	Retain as proposed
Ministry of Education Te Tāhuhu o Te Mātauranga (S456)	S456.052	SETZ - R1	Support	The Ministry supports these rules to manage the operation of educational facilities in the Settlement Zone.	Retain as proposed.
Ministry of Education Te Tāhuhu o Te Mātauranga (S456)	S456.053	DESIGNATIONS	Support	The Ministry support all designations listed in the Plan's Designation section and shown in the Plan Maps except as shown below in submission points.	Retain as proposed.

Ministry of Education Te Tāhuhu o Te Mātauranga (S456)	S456.054	Buller High School	Amend	MEDU-13 is incorrectly identified as “Lot 2, DP 19326” in the Plan. The Ministry request that this is amended to “Lot 2, DP 18326” to match the designation confirmation Dated 1 June 2021.	Amend Plan for Buller High School II as follows: “Lot 2, DP 19326” to “Lot 2, DP 18326”
Ministry of Education Te Tāhuhu o Te Mātauranga (S456)	S456.055	St John Paul II High School - NoR	Amend	MEDU – 33 is incorrectly identified as “Lot 2 DP 421099, Lot 6 DP 2780, Lot 3 DP 1510, Lot 4 DO 1510, and Lot 1 DP 1510” in the Plan. The Ministry request that this is amended to “Lot 2 DP 421099, Lot 6 DP 2780, Lot 3 DP 1510, Lot 4 DP 1510, and Lot 1 DP 1510” to match the designation confirmation Dated 1 June 2021. The Ministry also request that the name is amended from “St John Paul II High School” to “John Paul II High School” to match the Ministry records.	Amend Plan for St John Paul II High School – NOR as follows: “Lot 2 DP 421099, Lot 6 DP 2780, Lot 3 DP 1510, Lot 4 DO 1510, and Lot 1 DP 1510” to “Lot 2 DP 421099, Lot 6 DP 2780, Lot 3 DP 1510, Lot 4 DP 1510, and Lot 1 DP 1510” “St John Paul II High School” to “John Paul II High School”.
Ministry of Education Te Tāhuhu o Te Mātauranga (S456)	S456.056	St Patrick's School - NoR	Amend	MEDU-34 is incorrectly identified as “Lot 1 DP 2780, Lot 3 DP 330, Lot 4 DO 330, and Lot 2 DP 421099” in the Plan. The Ministry request that this is amended to “Lot 1 DP 2780, Lot 3 DP 330, Lot 4 DP 330, and Lot 2 DP 421099” to match the designation confirmation Dated 1 June 202.	Amend St Patrick’s School NOR as follows: “Lot 1 DP 2780, Lot 3 DP 330, Lot 4 DO 330, and Lot 2 DP 421099” to “Lot 1 DP 2780, Lot 3 DP 330, Lot 4 DP 330, and Lot 2 DP 421099”

Ministry of Education Te Tāhuhu o Te Mātauranga (S456)	S456.057	St Mary's School-NoR	Amend	<p>MEDU -35 is correctly identified by the legal description that was provide in the NOR and is stated in the site identifier. The map in the proposed plan (Figure 1) does not accurately represent the designated area as provided by the Notice of Requirement. The Ministry requests that the designated area of St Mary’s School is amended to remove the non integrated church land that is identified in Figure 2.</p>	<p>Amend as follows:Remove the non integrated church land in Figure 2 from the mapped designated area that is shown in Figure 1. [refer submission for maps]</p>
Misato Nomura (S151)	S151.001	Whole plan	Amend	<p>A lot of the titles of rules and the rules themselves are written in very long sentences with little to no punctuation. It is very difficult for a lay-person to understand. Many of the rules are going around in circles about similar topics and it is difficult to distinguish what the activity status is. In some of the chapters it may be easier to perhaps write it out as a table instead of spelling everything out in very long sentences that do not make much sense.</p>	<p>That the rules in the entire plan be re-written in clear, concise english with punctuations as necessary or to use tables to distinguish between the different activity levels instead of long-written forms. We request for the format of the plan to be changed to one that is easier to be understood.</p>

<p>Misato Nomura (S151)</p>	<p>S151.002</p>	<p>NOISE - R3</p>	<p>Oppose</p>	<p>This rule does not take into account Buller's low traffic volumes or the potential for property owners and developers to come up with a unique way to block noise based on the property that they own. such as bunds, heavy curtains internally, or shelter to block the noise. It will be too costly and time-consuming for property owners to hire a qualified engineer to assess the noise based on a home design on paper. We believe it is up to the individual owners to come up with ways to block the noise from State highways if even necessary.</p>	<p>That this rule be deleted. Or amended to be a permitted activity if noise mitigation designs have been provided. E.g. Bunding, growing a shelter belt or providing fencing.</p>
<p>Misato Nomura (S151)</p>	<p>S151.003</p>	<p>SASM - R10</p>	<p>Oppose in part</p>	<p>SASM17 is currently not listed in R9, making the same activity jump an activity status to R10, under controlled activities. The matters of control under R10 are related to the extent of earthworks and vegetation trimming or removal, as well as the cultural impacts on the sites significant to Maori. If a resource consent application is sought for this activity, the assessment of the matters of control will likely be done</p>	<p>That R10 becomes a permitted activity instead of a controlled activity. With the written approval from the relevant Poutini Ngai Tahu Runanga that is provided to the relevant District Council at least 10 working days prior to the activities commencing as per other permitted activities in this chapter.</p>

				<p>by the relevant Poutini Ngai Tahu Runanga instead of Council Planners as there are no permitted baselines for the physical aspects of earthworks and vegetation clearance taking place. If so, it will make more sense for this activity to be directly approved by the relevant Poutini Ngai Tahu Runanga. This way, it will save time and money not only for the applicant but also for council staff and all other relevant parties.</p>	
<p>Misato Nomura (S151)</p>	S151.004	Sites and Areas of Significance to Māori Rules	Support in part	<p>As landowners of a SASM site, we would like to help protect and preserve Maori culture. There are currently several rules listed in the proposed plan that outlines the need for approval from the relevant Poutini Ngai Tahu Runanga. However, there is no clear information regarding who to approach, how to approach them, what the expected timeframes are and the associated cost for it (if any). Hence, it is difficult to plan the build in advance. Under the RMA process, councils are expected to respond within a given timeframe. Without a</p>	<p>That the plan outlines the timeframes for relevant Poutini Ngai Tahu Runanga to provide approvals for SASM activities and that the approvals are given at no charge.</p>

				<p>timeframe, there is a potential for activities to be held up and we are not aware if the relevant Poutini Ngai Tahu Runanga are well equipped to handle the surge in enquiries that they may face. A quoted article says that this is not about royalties - we would like confirmation that there is no to minimal charge for us seeking approval from iwi.</p>	
<p>Misato Nomura (S151)</p>	S151.005	SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	Support	<p>Currently, there is also no guidance about what the iwi would like protected on the site. Hence it is difficult to understand what basis our application will be approved or declined. We would like more guidance regarding what the significance of each site is and how to manage the site better for all parties to benefit.</p>	<p>Provide more information about the significance of each site and how they should be managed.</p>
<p>Misato Nomura (S151)</p>	S151.006	Natural Environment Values	Amend	<p>There are currently too many overlay layers that makes the plan harder to read. Some of the overlays are similar and it is not clear if it is necessary to have them separated.</p>	<p>To combine or delete some of the overlays present.</p>

Misato Nomura (S151)	S151.007	Natural Hazards	Amend	There are currently too many overlay layers that makes the plan harder to read. Some of the overlays are similar and it is not clear if it is necessary to have them separated	To combine or delete some of the overlays present.
Misato Nomura (S151)	S151.008	Rural Zones - Objectives and Policies	Amend	There are currently too many precinct layers that makes the plan harder to read. Some of the precincts are similar and it is not clear if it is necessary to have them separated	Combine some of the precincts.
Misato Nomura (S151)	S151.009	SUB - S1	Support in part	Settlement zone is a new zone that did not exist in the Buller district plan. We are agreeable to the minimum lot sizes in Sub S1. Support in part as we have no comments for other zones' minimum lot sizes.	Retain Sub S1 minimum lot size for Settlement Zone sizes.
Misato Nomura (S151)	S151.010	Coastal Environment	Oppose	We would like to question how the Coastal Environment has been mapped. Our property in Kawatiri Place has no Coastal Environment whatsoever. We are not able to look out to sea, we do not smell the sea and do not have any marine life within our property. On the otherhand, half of Carters beach which is known to be a coastal settlement has been left out. In	To remove Kawatiri Place from the Coastal Environment Overlay, OR delete Coastal Environment Overlay and set the boundary to within 150m of Mean High Water Spring as per the Operative Buller District Plan.

				<p>areas such as Elley Drive which has been well sought after for its proximity to the coast and its sea view properties have been completely left out of this overlay. We would like clarification on how this map was drawn, what data was used and why certain coastal settlements have been left out while areas like Kawatiri Place and Eastons Road have been included.</p>	
<p>Misato Nomura (S151)</p>	S151.011	Coastal Environment	Support	<p>There are also 3 Coastal Overlays. High Coastal Natural Character Area, Outstanding Coastal Environment and Coastal Environment. It is difficult to distinguish the difference between High Coastal Natural Character Area and Outstanding Coastal Environment. There are also little to no rules that speak to the Coastal Environment and if there are, it has not been clearly outlined.</p>	<p>Revert back to standards in Buller District Plan and identifying Coastal Environments using areas within 150m of the Mean High Water Springs instead.</p>
<p>Misato Nomura (S151)</p>	S151.012	General Approach	Amend	<p>In Table 1 of General Approach, the following is mentioned "Permitted activities do not require resource consent, provided standards and all other relevant rules are met." This implies that all rules within the</p>	<p>To remove reference to other Permitted Activity rules within a Permitted Activity rule.</p>

			<p>Permitted Activities have to be met in order for an activity to be Permitted. However, throughout the entire plan, Permitted activities are referenced within other permitted activities, making it confusing for the plan user as they may assume that only the referenced rule within the permitted activity rule has to be complied. For example in GRUZ: The following can be seen throughout the Permitted Activity rules. ----- -----Where: 1. All performance standards for Rule GRUZ - R1 are compliedwith;----- -----Using the example above, and applied to Rule GRUZ R2, it may be interpreted that GRUZ R3 to R14 does not have to be complied with for R2 to be complied with. As it has already been stated within the general approach that all rules have to be met, this seems unnecessary, confusing and makes the plan much longer than it has to be.</p>	
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Mitchells 2021 Limited (S448)	S448.001	Rezoning Requests	Amend	<p>This will provide for expansion of the Lake Brunner Eco Lodge to provide high-end accommodation. The aim is to provide high end visitor facilities while retaining ecological values. [refer submission for detail and maps]. The changed zoning would be consistent with adjacent sites. Rezoning of the site would enable a clearer consenting pathway for the development of the Mitchells Proposal, as SETZ provisions allow for greater building density, whilst still necessitating a resource consent due to the ONL overlay. Therefore, a change of zoning would enable the potential expansion of tourism activities in the Mitchells area while ensuring that development occurs in accordance with ecological values and with a clear consenting pathway consistent with the provisions of the TTPP.</p>	Rezone the block shown on the submission maps (PT RS 2032) known as the Forestry Lake Front Block at Mitchells, Lake Brunner from Rural Lifestyle Zone to Settlement Zone.
Mitchells 2021 Limited (S448)	S448.002	Rezoning Requests	Amend	This would allow for a 22 lot subdivision in the Rural Lifestyle Zone proposed part of the block while the balance area would be retained as General Rural Zone.	Rezone the block shown on the submission maps (Lot 4 DP 440795) known as the Bush Block at Mitchells, Lake Brunner from General Rural Zone to a combination of General Rural Zone and Rural Lifestyle Zone (refer submission for maps).

Mitchells 2021 Limited (S448)	S448.003	Natural Features and Landscapes	Amend	The adjustment of the ONL boundary line to exclude the portions of the sites involved in the Mitchells proposal would only be minor, resulting in a shift of just a few meters, without compromising the overall integrity of the ONL Overlay as a whole. Redefining the ONL boundary line to exclude the areas involved in the Mitchells Proposal would potentially facilitate the process of obtaining consent for activities (e.g. indigenous vegetation removal) necessary for the development of building platforms, roading and on-site services.	That the ONL boundary line at Mitchells Lake Brunner be adjusted so that the proposed subdivision area of the Bush Block, and the Forestry Lake Front Block (or at least the part of it to be developed) are outside the ONL. (refer submission for maps)
Mohammed & Jenny Khan (S184)	S184.001	Sites and Areas of Significance to Māori	Oppose	We do not agree on the Maori significance on my property as it sounds like land grabbing. You need to consult us before going onto my property.	Remove SASM from property [location TBC - Kumara area]
Moira Devlin (S117)	S117.001	SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	Oppose	The site has been extensively disturbed and the owners have plans and they go ahead from engineers and the Buller District to proceed with the build. We wish too be able to continue our use of the land without any threat that we might	Take our block of land off the SCHED3 - sites and area of significance to Maori [tbc SASM 36 Tirimoana] or give us the right to develop the land as a family holiday/residential place.

				not be able to utilise the land in the future.	
Moreporks Lakeside Lodge LTD (S470)	S470.001	Sites and Areas of Significance to Māori	Oppose	It is unclear why SASM 79 extends beyond the foreshore of Cashmere Bay to cover private land.	Amend planning maps in relation to SASM 79 as shown in the map attached to the submission
Moreporks Lakeside Lodge LTD (S470)	S470.002	SASM 79	Support in part		Retain the schedule as notified in so far as it relates to SASM 79 by ensuring that the columns under the headings Category and Relevant Permitted Activity Rules remain blank,
Moreporks Lakeside Lodge LTD (S470)	S470.003	Sites and Areas of Significance to Māori Rules	Support in part	Support in so far as they do not regulate activities at SASM 79	Retain the approach of having no specific rules for activities at SASM 79.
Murray Cochrane (S435)	S435.001	Sites and Areas of Significance to Māori	Oppose	Re SASM 62. I am against my land and section having a Significant Site to Maori placed upon it. This is very unfair. I understand that now this would have no impact but if I wish to do development on my property in the future that is uncertain. I have also learned that if I am to sell my home in the future that it will be on my LIM.	Remove SASM 62 from my property.
Murray Dellaca (S87)	S87.001	General Residential Zone	Neutral	Relates to Alma Road Terrace rezoning. Submission provides information on drainage and other	Address the issues raised in the submission around drainage and land covenants if rezoning of Alma Road area is to go ahead.

				issues that need to be resolved to support rezoning. [refer written submission]	
Murray & Marian Molloy (S244)	S244.002	Sites and Areas of Significance to Māori	Oppose	We wish to advise that we oppose the establishment of SASM 68 -Paroa Lagoon in its current format. The mapping is incorrect and amendments are supported by Poutini Ngāi Tahu.	That the eastern boundary of the designated SASM68 be amended and realigned to the Paroa Lagoon waterway eastern edge. New large scale maps accurately showing this new boundary delineation be produced and supplied to all affected parties for approval.
Murray & Marian Molloy (S244)	S244.003	Sites and Areas of Significance to Māori Rules	Amend	The RMA states that because SASM are considered a type of historic heritage, rules associated with them have legal effect from the time the proposed TTPP was notified. This is totally rejected by the affected private landowners, who are submitting and requesting that these rules be withdrawn from the private properties identified.	That any of the proposed references, rules, or conditions, placed on any private property fronting the state highway be withdrawn immediately. Any Rules with immediate effect be withdrawn from the currently effected private properties.
Murray Stewart (S217)	S217.001	Permitted Activities	Oppose	Building restriction in Open Space Zone is not practical. 110m2 minimum to build a 9x12 3 bay shed. Any smaller is not practical	Amend Permitted Activity Rules to allow a 110m2 minimum to build a 9x12 3 bay shed.
Murray Stewart (S217)	S217.002	Rezoning Requests	Amend	1 side of river is classified as highly productive land. Other side no classification Should be based on soil type not what is done with the land.	Review boundaries of Highly Productive Land Precinct based on soil type. Remove areas of rocky and landslide areas.

				Areas of rocky, landslide area included in highly productive land.	
Murray Stewart (S217)	S217.003	Natural Features and Landscapes	Oppose	Includes gorse riverbed and modified podocarp not mature beech. Not justified for inclusion. Descriptions aren't correct	Remove outstanding natural landscape overlay from property in Hohonu area.
Murray Stuart and Karen Jury Rob Lawrence (S455)	S455.001	Rezoning Requests	Oppose	The current approach will not deliver the purpose of the Resource Management Act. There is no lawfully established mineral extraction activity therefore the zone does not meet the criteria at Kumara. The proposed Kumara Mineral Extraction Zone is ultra vires, and the One Plan Committee has inappropriately used its legal power or authority.	Remove the Mineral Extraction Zone at Kumara.
Murray Stuart and Karen Jury Rob Lawrence (S455)	S455.002	GRUZ - R12	Oppose	The RMA has a clear procedure for the setting of environmental rules: Land use activity should first try to avoid adverse effects on the environment, before considering potential for mitigation and then considering remediation. The Permitted Activity does not do this. In the Permitted rule itself there is no attempt to avoid adverse effects on adjoining or nearby parties.	Make mineral extraction require a resource consent in any Rural Zone.

				<p>Hours of operation have increased from current plan provisions. Blasting and vibration is permitted to occur from 7am to 10 pm. With a Permitted Activity classification, there is no opportunity for an on-site assessment to be made, so that steps to avoid, remedy or mitigate noise, light, visual and other effects can be put in place. A Permitted Activity will not be monitored. The effects of the activity, and the risk of non-compliance with standards, means that Permitted Activity of this scale is not compatible near to sensitive uses such as residential settlements.</p>	
<p>Murray Stuart and Karen Jury Rob Lawrence (S455)</p>	S455.003	Mineral Extraction Zone	Support	<p>The proposed framework for mineral extraction activity will result in unacceptable environmental impacts, that will harm Kumara. It is clear that there is an imbalance in the proposed One Plan for mining to be enabled at the detriment of existing land use and residential settlements.</p>	<p>Mineral extraction to require a resource consent so that impacts on surrounding communities are able to be avoided, remedied or mitigated.</p>

Myles Bengel (S241)	S241.001	Sites and Areas of Significance to Māori	Oppose	My small section, Lot 4, DP 354288 on Old Christchurch Road has been identified as containing sites and areas of significance to Maori. It has never before been mentioned that my section has any significance to Maori. The section I have is only 1.2ha in size and consists solely of flat ground. As a result of this news, my plans for moving to Hokitika, building on the land and investing in the West Coast have been changed. Since hearing of this proposal I have contacted a real estate agent in Hokitika to arrange for the sale of this land. I have been informed by my real estate agent that my sale potential will be hindered by this property being classified as significant to Maori.	Remove SASM from property at Lot 4, DP 354288 on Old Christchurch Road.
Nathan Thompson (S165)	S165.001	Rezoning Requests	Amend	Existing dwelling, very steep from road to property. The existing quarry near by would be more adequate for a commercial zone.	Rezone 103 Alma Road from Commercial to Residential as per surrounding properties with dwellings.
Neil Bradley (S298)	S298.001	Sites and Areas of Significance to Māori	Oppose	The natural course of the Kawhaka creek has changed by 1000s of metres through catchments, historical earthworks and natural	Remove SASM 104 from the property at 802 Old Christchurch Road, Hokitika.

				<p>phenomena throughout hundreds/thousands of years. My property has also been stripped and graded for mining numerous times, with no historical artefacts found whatsoever, My property is just over two acres. On one boundary is the highway and, on the opposite boundary there is an Esplanade council reserve. So how is a thin section like mine with significant and comprehensive ground disturbance with no original features of " areas of significance" with zero artefacts found still constitute an "area of significance"</p>	
Neil Bradley (S298)	S298.002	SASM 104	Oppose	<p>Please explain your evidence for claiming MY land has " significance" to Māori?</p>	<p>Provide information as the significance of SASM 104 and why it was scheduled.</p>
Neil Bradley (S298)	S298.003	Sites and Areas of Significance to Māori	Oppose	<p>I purchased my property free hold, with no covenants. If that will change, please specify how compensation will be calculated and debited due to potential loss of value by having new conditions potentially added. Please confirm compensation will be paid and</p>	<p>Provide compensation for the identification of SASM 104 on my property.</p>

				explain the method used for this process	
Neil Hateley (S139)	S139.001	Westport Airport and Karamea Aerodrome	Oppose in part	My property is at the edge of the airport flight path as shown on the layer maps. Requiring a consent to build anything over 1.2m in height at this distance is wrong. This will affect normal operation on the farm. It will cause issues for infrastructure utility providers like power. The heights do not correspond with any expected distances from CAA operational limits for drone licenses or pilots licenses. Why is Westport and Karamea airports any different to Hokitika or Greymouth when operations are equivalent?Parts of my property are effectively at seal level and others are 15m higher yet the wording would apply to both ground levels yet one would protrude much further into the available space for airport operations.If a height limit is deemed necessary then could be scaled somehow. For example within 1km of airport up to 10m , 1-2km up to 15m, 2-4km up to 20m.	Adjust the height for Westport and Karamea flight paths to be a realistic value. Recommend limit equal to or greater than 20 metres rather than the current 1.2m.

Neil Mouat (S535)	S535.001	Natural Hazards Objectives	Amend	Similarly to NH – O4, the role that protective structures play in natural hazard mitigation needs to be recognised in the Natural Hazards Objectives.	Add a new objective: To ensure the role of hazard mitigation played by protective structures and works that minimise impacts of hazards including rockwalls and stopbanks is recognised and protected
Neil Mouat (S535)	S535.002	NHP3	Oppose in part	Inclusion of the word “existing” in this policy unduly limits future development, even where risk from natural hazard is low or could be substantially mitigated using technical solutions is obstructed.	Amend to: When managing natural hazards: a. Promote the use of natural features and appropriate risk management approaches in preference to hard engineering solutions in mitigating natural hazard risks; and b. Avoid increasing risk to people, property and the environment; while c. Recognising that in some circumstances hard engineering solutions may be the only practical means of protecting existing communities and critical infrastructure.
Neil Mouat (S535)	S535.003	NHP10	Oppose in part	The wording of this policy is too restrictive and precludes a landowner seeking other expert input or utilising solutions there hazard could be substantially mitigated using technical solutions.	Include wording that allows technical solutions or differing expert opinion to support resource consent applications for development. The wording of NH – P11 is more appropriate for severe overlays than the current wording.
Neil Mouat (S535)	S535.004	NHR1	Oppose in part	Two and five years is an insufficient length of time for reconstruction/replacement.	Amend rule so that there is ten year period within which lawfully established buildings can be reconstructed/replaced in all overlays.

Neil Mouat (S535)	S535.005	NHR38	Oppose in part	Two and five years is an insufficient length of time for reconstruction/replacement and there is no activity status where compliance is not achieved.	Amend rule so that there is ten year period within which lawfully established buildings can be reconstructed/replaced in all overlays and if compliance is not achieved, this should be a Discretionary Activity.
Neil Mouat (S535)	S535.006	NHR41	Oppose in part	The activity status when compliance is not achieved is too restrictive.	Amend status when compliance is not achieved to Discretionary.
Neil Mouat (S535)	S535.007	NHR42	Oppose in part	The activity status when compliance is not achieved is too restrictive.	Amend status when compliance is not achieved to Discretionary.
Neil Mouat (S535)	S535.008	NHR44	Oppose	Activity status is too restrictive.	Amend status to Discretionary.
Neil Mouat (S535)	S535.009	SASM -R9	Support	We support that maintenance, repair and Upgrading of Network Utility Structures on or within SASM 31 is a permitted activity.	Retain as notified.
Neil Mouat (S535)	S535.010	ECO - P3	Support	We support this policy.	Retain as notified.
Neil Mouat (S535)	S535.011	ECO - P4	Support	We support this policy.	Retain as notified.
Neil Mouat (S535)	S535.012	ECO - P7	Support in part	We support that this policy provides for consideration of “the appropriateness of any biodiversity offsetting or compensation in accordance with Policy 9 to offset any residual adverse effects that remain after avoiding, remedying	Retain as notified.

				and mitigating measures have been applied.”	
Neil Mouat (S535)	S535.013	ECO - P9	Support	We support this policy.	Retain as notified.
Neil Mouat (S535)	S535.014	ECO - R1	Oppose in part	We request that provision is made for low-level clearance for building sites within SNAs (including for future/not yet approved subdivisions). Providing for these types of living options can actually facilitate predator and pest management and control and is an important lifestyle option for the region.	Amend wording to provide for building sites.
Neil Mouat (S535)	S535.015	ECO - R2	Oppose in part	We request that provision is made for low-level clearance for building sites within SNAs (including for future/not yet approved subdivisions). Providing for these types of living options can actually facilitate predator and pest management and control and is an important lifestyle option for the region.	Amend wording to provide for building sites.
Neil Mouat (S535)	S535.016	ECO - P9	Support	We support this policy.	Retain as notified.

Neil Mouat (S535)	S535.017	ECO - R4/SUB - R7	Oppose		Refer to SUB – R7 below.
Neil Mouat (S535)	S535.018	ECO - R6/SUB - R9	Oppose in part		Refer to SUB – R9 below.
Neil Mouat (S535)	S535.019	ECO - R8/SUB - R15	Oppose in part		Refer to SUB – R15 below.
Neil Mouat (S535)	S535.020	ECO - R9/SUB - R27	Oppose		Refer to SUB – R27 below.
Neil Mouat (S535)	S535.021	NFL - P1	Oppose in part	Residential activities must be provided for.	Amend to include residential activities.
Neil Mouat (S535)	S535.022	SUB - P9	Oppose in part	Esplanade reserves and strips should not be required to be wider than 20m	Delete references to widths greater than 20m.
Neil Mouat (S535)	S535.023	SUB - R5	Support	The activity status when compliance with point 6 (i.e. Coastal Severe Overlays etc) is appropriate. Where compliance is not achieved, status should be Discretionary.	Retain status when compliance with point 6 is not achieved to Discretionary.
Neil Mouat (S535)	S535.024	SUB - R7/ECO - R4	Oppose	The provision heading is unclear given SNAs are yet to be mapped. This is not necessary and a SNA does not need to be within a single allotment. Biodiversity offsetting or compensation etc. should be able to be considered within this point.	Amend heading to read: Subdivision to create allotment(s) of Land Containing an Scheduled Area of Significant Indigenous Biodiversity. Delete. Amend to: The subdivision will not result in buildings or access ways being located within the identified area of significant indigenous biodiversity or the need for

					clearance of significant indigenous vegetation to provide for future access to any site unless adverse effects can be addressed by alternative mitigation measures such as biodiversity offsetting and environmental compensation ; and...
Neil Mouat (S535)	S535.025	SUB - R9/ECO - R6	Oppose in part	The provision is unclear given SNAs are yet to be mapped. This is not necessary and a SNA does not need to be within a single allotment. Biodiversity offsetting or compensation etc. should be able to be considered within this point.	Amend heading to read: Subdivision of Land to create allotment(s) Containing an Scheduled Area of Significant Indigenous Biodiversity not meeting Rule SUB – R7. Delete. Amend to: The subdivision will not result in buildings or access ways being located within any Significant Natural Area identified in Schedule Four unless adverse effects can be addressed by alternative mitigation measures such as biodiversity offsetting and environmental compensation ; and...
Neil Mouat (S535)	S535.026	SUB - R15/ECO - R8	Oppose in part	Points 1 and 2 should be deleted from this rule as the escalation to Non-Complying is inappropriate and too restrictive.	Delete points 1 and 2. Activity status where there is non-compliance should be deleted as there should be no escalation to Non-Complying status.
Neil Mouat (S535)	S535.027	SUB - R16	Oppose in part	Point 1 should be deleted from this rule as the escalation to Non-Complying is inappropriate and too restrictive.	Delete point 1. Activity status where there is non-compliance should be deleted as there should be no escalation to Non-Complying status.

Neil Mouat (S535)	S535.028	SUB - R18	Support	We support this rule.	Retain
Neil Mouat (S535)	S535.029	SUB - R21	Oppose in part	We support this rule but note the error that where activity status where compliance is not achieved status becomes Non-complying	Amend to: Activity status where compliance not achieved: Non-complying N/A.
Neil Mouat (S535)	S535.030	SUB - R24	Oppose	The rule is too restrictive.	Delete
Neil Mouat (S535)	S535.031	SUB - R25	Oppose	The rule is too restrictive.	Delete
Neil Mouat (S535)	S535.032	SUB - R27/ECO - R9	Oppose	The rule is too restrictive.	
Neil Mouat (S535)	S535.033	Coastal Environment	Oppose in part	This overlay is far too extensive. The extent inland that the overlay covers is inappropriate and will unduly restrict development.	Amend and reduce the inland extent of the Coastal Environment Overlay.
Neil Mouat (S535)	S535.034	CE - O1	Support	We support these objectives.	Retain as notified.
Neil Mouat (S535)	S535.035	CE - O2	Support	We support these objectives.	Retain as notified.
Neil Mouat (S535)	S535.036	CE - O3	Support in part	The term “functional need” does not go far enough in recognising that some activities are required to operate in the coastal environment e.g. due to the location of mineral deposits.	Amend as follows: To provide for activities which have a functional, technical, operational or locational need to locate in the coastal environment in such a way that the impacts on natural character, landscape, natural features, access and biodiversity values are minimised.

Neil Mouat (S535)	S535.037	CE - P1	Support	We support this provision.	Retain as notified.
Neil Mouat (S535)	S535.038	CE - P4	Support in part	We believe this policy needs amending.	Include a point c. that provides for activities which have a functional, technical, operational or locational need to locate in the coastal environment.
Neil Mouat (S535)	S535.039	CE - P5	Support in part	We support this provision but believe this needs amending.	Amend point d. as follows: Have a functional, technical, locational or operational need to locate within the coastal environment.
Neil Mouat (S535)	S535.040	CE - P6	Support	We support this provision.	Retain as notified.
Neil Mouat (S535)	S535.041	CE - R1	Support	We support this provision.	Retain as notified.
Neil Mouat (S535)	S535.042	CE - R4	Oppose in part	The maximum height limit of buildings and structures should be that specified for the particular zone. The gross ground floor area is too restrictive and should revert to zone rules.	Delete point 2. A. i. Delete point 2. A. iii.
Neil Mouat (S535)	S535.043	CE - R5	Oppose in part	We believe this is too restrictive.	Amend to be more enabling of development.
Neil Mouat (S535)	S535.044	CE - R6	Oppose in part	We believe this is too restrictive.	Amend to be more enabling of development.
Neil Mouat (S535)	S535.045	CE - R7	Oppose in part	We believe this is too restrictive.	Amend to be more enabling of development.
Neil Mouat (S535)	S535.046	CE - R8	Oppose in part	We believe this is too restrictive.	Amend to be more enabling of development.

Neil Mouat (S535)	S535.047	CE - R9	Oppose in part	We believe this is too restrictive.	Amend to be more enabling of development.
Neil Mouat (S535)	S535.048	CE - R10	Oppose in part	We believe this is too restrictive.	Amend to be more enabling of development.
Neil Mouat (S535)	S535.049	CE - R11	Oppose in part	We believe this is too restrictive.	Amend to be more enabling of development.
Neil Mouat (S535)	S535.050	CE - R12	Oppose in part	We believe this is too restrictive.	Amend to be more enabling of development.
Neil Mouat (S535)	S535.051	CE - R14	Oppose in part	We believe this is too restrictive.	Amend to be more enabling of development.
Neil Mouat (S535)	S535.052	CE - R15	Oppose in part	We believe this is too restrictive.	Amend to be more enabling of development.
Neil Mouat (S535)	S535.053	CE - R16	Oppose in part	We believe this is too restrictive.	Amend to be more enabling of development.
Neil Mouat (S535)	S535.054	CE - R17	Oppose in part	We believe this is too restrictive.	Amend to be more enabling of development.
Neil Mouat (S535)	S535.055	CE - R18	Oppose in part	We believe this is too restrictive.	Amend to be more enabling of development.
Neil Mouat (S535)	S535.056	CE - R19	Oppose in part	We believe this is too restrictive.	Amend to be more enabling of development.
Neil Mouat (S535)	S535.057	CE - R21	Oppose in part	We believe this is too restrictive.	Amend to be more enabling of development.
Neil Mouat (S535)	S535.058	SVZ - R1	Oppose in part	We believe these rules are too restrictive.	Amend to be more enabling of development.
Neil Mouat (S535)	S535.059	SVZ - R2	Oppose in part	We believe these rules are too restrictive.	Amend to be more enabling of development.

Neil Mouat (S535)	S535.060	SVZ - R3	Oppose in part	We believe these rules are too restrictive.	Amend to be more enabling of development.
Neil Mouat (S535)	S535.061	SVZ - R4	Oppose in part	We believe these rules are too restrictive.	Amend to be more enabling of development.
Neil Mouat (S535)	S535.062	SVZ - R5	Oppose in part	We believe these rules are too restrictive.	Amend to be more enabling of development.
Neil Mouat (S535)	S535.063	SVZ - R6	Oppose in part	We believe these rules are too restrictive.	Amend to be more enabling of development.
Neil Mouat (S535)	S535.064	SVZ - R7	Oppose in part	We believe these rules are too restrictive.	Amend to be more enabling of development.
Neil Mouat (S535)	S535.065	SVZ - R8	Oppose in part	We believe these rules are too restrictive.	Amend to be more enabling of development.
Neil Mouat (S535)	S535.066	SVZ - R9	Oppose in part	We believe these rules are too restrictive.	Amend to be more enabling of development.
Neil Mouat (S535)	S535.067	ECO - R5	Oppose in part	We believe this is too restrictive.	Amend to be more enabling of development.
Neil Mouat (S535)	S535.068	ECO - R7	Oppose in part	We believe this is too restrictive.	Amend to be more enabling of development.
Neil Mouat (S535)	S535.069	CE - P6	Support	We support this policy.	Retain as notified.
Neil Mouat (S535)	S535.070	SVZ - O1	Support	We support this objective.	Retain as notified.
Neil Mouat (S535)	S535.071	SVZ - O2	Support	We support this objective.	Retain as notified.
Neil Mouat (S535)	S535.072	SVZ - P1	Support in part	Provide for growth and change to the Fox Glacier, Franz Josef/Waiau and Punakaiki townships that:a.	

				Supports the long-term viability of the commercial areas and the communities that support them;b. Recognises the unique scenic qualities of the environments and does not compromise the dominance of the natural landscape setting in which the townships are located; andc. Avoids locating further development in areas at greatest risk from significant natural hazards.	
Neil Mouat (S535)	S535.073	SVZ - P2	Oppose in part	Provide for new commercial development areas beyond the current Fox Glacier and Franz Josef/Waiau centres where these are at lower risk from natural hazards and avoid areas of high hazard risk.	
Neil Mouat (S535)	S535.074	SVZ - P3	Support	We support this objective.	Retain as notified.
Neil Mouat (S535)	S535.075	SVZ - P4	Support in part	Staff/worker accommodation needs to be better recognised in the policy.	Amend to: Support the development of appropriate tourism and visitor businesses such as visitor accommodation, visitor attractions, worker accommodation and tourism support facilities that relate to the scenic environment in which they are located.

Neil Mouat (S535)	S535.076	SVZ - P5	Support	We support this objective.	Retain as notified.
Neil Mouat (S535)	S535.077	SVZ - R1	Oppose in part	Aspects of this rule are far too onerous particularly those relating to external storage and waste management space and colour specifications.	Delete SVZ – R1 2. or, if compliance not achieved, this should default to a RDA not a DA. Delete SVZ – R1 4.
Neil Mouat (S535)	S535.078	SASM 31	Support	We support that there are no relevant permitted activity rules relating to SASM 31.	Retain as notified.
Neil Mouat (S535)	S535.079	SCHED8 - SCHEDULE OF OUTSTANDING COASTAL NATURAL CHARACTER	Oppose in part	We do not agree that the extent of Outstanding Coastal Natural Character has been correctly mapped in relation to our property (4224 State Highway 6, Punakaiki). We have an existing consented use within the outstanding coastal natural character mapping on our property.	Amend overlay extent.
Neil Mouat (S535)	S535.080	Coastal Severe and Coastal Alert Overlay	Oppose in part	We do not agree that the hazard has been correctly mapped in the vicinity of our property (4217 State Highway 6, Punakaiki).	Amend overlay extent.
Neil Mouat (S535)	S535.081	SCHED5 - SCHEDULE OF OUTSTANDING	Oppose in part	We do not agree that the extent of Outstanding Natural Landscape has been correctly mapped in relation to	Amend overlay extent.

		NATURAL LANDSCAPES		our property (4224 State Highway 6, Punakaiki).	
Neil Mouat (S535)	S535.082	Outstanding Natural Character	Oppose in part	We do not agree that the extent of Outstanding Coastal Natural Character has been correctly mapped in relation to our property (4224 State Highway 6, Punakaiki).	Amend overlay extent.
Neville Higgs (S329)	S329.001	ASW - R2	Oppose	Yachting regattas and club sailing days have been held on Lake Mahinapua for about the last 80 years without any major issues having arisen and as such should be able to continue as of right without the need to get the consent for each or every event from a body that is not representative of the total population of New Zealand. Similarly trailer yachts have been operated at various times on the lake for a number of years and also should not be prevented from continuing to do so. There are activities associated with sailing that require motors to be used on craft. The placing of buoys for sailing events, the launching and retrieving of larger yachts and the providing of assistance to yachts when the wind	Amending the rules so as Lake Mahinapua can be used for yachting regattas, weekend club sailing and casual sailing including the sailing of trailer yachts as of right. This will require providing for the use of motorised craft for the setting of buoys and general direction of the regattas and club sailing. The use of auxiliary motors on trailer yachts for launching and retrieval, propulsion when the wind drops off and the like is also required. This can be done by <ul style="list-style-type: none"> • deleting Lake Mahinapua from the provision or • defining motorised craft so as the definition does not include craft being propelled by a motor but not exceeding a speed of 5 knots.

				<p>suddenly drops off or sudden high winds cause them to overturn are some of the major reason for requiring boat motor assistance. Limiting the speed of motorised craft to 5 knots over the whole lake, except for in emergencies, would be a practical way of keeping a more tranquil environment.</p>	
Neville Higgs (S329)	S329.002	Rezoning Requests	Amend	<p>When neighbour consent was sort for the development for the industrial use on the eastern side of Marsden Road opposite the area where the zoning is being queried, the applicant for the new industrial use, who was then operating on the western side of Marsden Road, made it clear that the area on the western side of Marsden Road would return to rural use. Neighbour consent was given on this basis and the new plan should now reflect the agreement that the land in question returns to rural zoning..</p>	<p>The zoning of Part Lot 116 Deposited Plan 359532, Westland Survey District (i.e. the land on the Western side of Marsden Road South of Pope Road and between Marsden Road and Sawyers Creek) should be changed from General Industrial to Special Purpose Zone - Future Urban Zone or similar.</p>
Neville Higgs (S329)	S329.003	TEMP - R5	Oppose	<p>Freedom camping should not be limited to being in locations identified and signposted by Waka Kotahi - New Zealand Transport</p>	<p>Delete section 1 of this provision</p>

				<p>Authority or the relevant District Council as a designated Responsible Camping Site or Freedom Camping Site as this limits the sites on which freedom camping is permitted to areas actually sign posted as such. Apart from the obvious problem of signs being knocked over or vandalised, there are many areas on state highway reserve that are not so identified and sign posted that are suitable for freedom camping and have been used for such for years. There would seem to be no reason not to continue using these areas.</p>	
<p>Newcoast Resources Limited (S191)</p>	S191.001	Mineral Extraction Zone	Support	<p>The West Coast needs industry and employment. Mineral extraction projects will deliver new economic opportunities and offshoots to other businesses including construction, sciences, engineering, transport, mechanical and the hospitality, retail and accommodation sectors. Future projects are likely to bring services to the port and rail and services - providing resilience for those services, AF8 and investment opportunities. The region thereare</p>	<p>Retain mineral extraction zones, including at Barrytown</p>

				<p>has a low level of "non DOC" land, and we need to ensure that this residual land is used for its highest and best value use while ensuring environmental effect are managed. Mining activities can achieve this. The government has identified green minerals as a target area for growth, and the West Coast is fortunate enough to contain these green minerals. The West Coast should be extracting the green mineral to provide much-needed benefits to the region.</p>	
Newcoast Resources Limited (S191)	S191.002	Rural Zones - Objectives and Policies	Support	<p>Mineral extraction projects will deliver new economic opportunities and offshoots to other businesses including construction, sciences, engineering, transport, mechanical and the hospitality, retail and accommodation sectors. Future projects are likely to bring services to the port and rail and services - providing resilience for those services, AF8 and investment opportunities</p>	<p>Retain provisions supporting mineral extraction in the rural zones.</p>
Newcoast Resources	S191.003	Open Space and Recreation Zones	Support	<p>Mineral extraction projects will deliver new economic opportunities</p>	<p>Retain mineral extraction provisions in the open space zones.</p>

Limited (S191)				and offshoots to other businesses including construction, sciences, engineering, transport, mechanical and the hospitality, retail and accommodation sectors. Future projects are likely to bring services to the port and rail and services - providing resilience for those services, AF8 and investment opportunities	
Newcoast Resources Limited (S191)	S191.004	Mineral Extraction	Support	Mineral extraction projects will deliver new economic opportunities and offshoots to other businesses including construction, sciences, engineering, transport, mechanical and the hospitality, retail and accommodation sectors. Future projects are likely to bring services to the port and rail and services - providing resilience for those services, AF8 and investment opportunities	I support recognising the importance of mining to the West Coast.
New Zealand Agricultural Aviation Association (S166)	S166.001	AG - O1	Support	The strategic objective seeks to maintain the productive value of versatile soils and agricultural land for current and future agricultural and horticultural uses. Existing agricultural and horticultural uses	Retain objective AG-O1

				are undertaken on land appropriate for these purposes	
New Zealand Agricultural Aviation Association (S166)	S166.002	AG - O2	Support	The strategic objective seeks to recognise the significance of agriculture to the West Coast economy, provide for agricultural development and innovation and enable the support industries and services needed to maintain agricultural viability within rural areas. Agricultural aviation is an important support service needed to maintain agricultural viability and contribute to the economy of the region	Retain objective AG-O2
New Zealand Agricultural Aviation Association (S166)	S166.003	NENV- O1	Amend	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.	<p>Amend NENV-O1:</p> <p>To recognise the features that contribute to the West Coast's character and identify and Poutini Ngai</p> <p>Tahu's cultural and spiritual values by preserving natural character, and</p>

					<p>protecting outstanding natural features and landscapes and significant indigenous biodiversity from inappropriate subdivision use and development</p>
New Zealand Agricultural Aviation Association (S166)	S166.004	NENV - O3	Amend	The strategic objective seeks to protect the natural environment values NZAAA submits that weed and pest control are critical tools in maintaining the natural environment and seeks to have this recognised in the objectives	<p>Retain objective NENV-02 and add:</p> <p>d. The need for weed and pest control to protect and maintain the natural environment values</p>
New Zealand Agricultural Aviation Association (S166)	S166.005	AGRICULTURAL, PASTORAL AND HORTICULTURAL ACTIVITIES	Support	NZAAA supports the inclusion of the use of rural airstrips and helicopter landing areas by aircraft for agricultural, pastoral and horticultural activities.	Retain inclusion of rural airstrips and helicopter landing areas in the definition of agricultural, pastoral and horticultural activities

<p>New Zealand Agricultural Aviation Association (S166)</p>	<p>S166.006</p>	<p>Definitions</p>	<p>Amend</p>	<p>NZAAA seeks a new definition for agricultural aviation activity so that it can be used in relevant rules and definitions to clearly describe the use of rural airstrips and landing areas by aircraft for rural production, biosecurity and biodiversity (conservation) activities.</p>	<p>Add a definition of Agricultural aviation activity:</p> <p>means the intermittent operation of an aircraft from a rural airstrip or helicopter landing area for primary production activities including rural production and plantation forestry production, and conservation activities for biosecurity, or biodiversity purposes, including stock management, and the application of fertiliser, agrichemicals, or vertebrate toxic agents (VTA's). For clarity, aircraft includes fixed-wing aeroplanes, helicopters, and unmanned aerial vehicles (UAV's).</p>
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New Zealand Agricultural Aviation Association (S166)	S166.007	CONSERVATION ACTIVITIES	Amend	NZAAA supports the inclusion of a definition for conservation activity but seeks that it explicitly includes weed and pest control and the use of aircraft.	Amend the 2nd 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 and the intermittent use of aircraft for conservation purposes.
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New Zealand Agricultural Aviation Association (S166)	S166.008	Definitions	Amend	NZAAA seeks a definition of Improved Pasture to clarify rules for native vegetation clearance	Add a definition of Improved Pasture: means an area of land where exotic pasture species have been deliberately sown or maintained for the purpose of pasture production, and species composition and growth has been modified and is being managed for livestock grazing
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New Zealand Agricultural Aviation Association (S166)	S166.009	REVERSE SENSITIVITY	Support	NZAAA supports the definition and recognition of reverse sensitivity	Retain the definition
New Zealand Agricultural Aviation Association (S166)	S166.010	TEMPORARY ACTIVITY	Amend	NZAAA seeks that it is clear that agricultural aviation activities are not classed as a temporary activity.	Amend the definition of temporary activities to include an additional exemption: iv) agricultural aviation activities
New Zealand Agricultural Aviation Association (S166)	S166.011	Definitions	Amend	Policy RURZ-P27 uses the term airfield but the term is not defined. RURZ-P26 refers to airstrips which are also not defined. Rural airstrips are linked to rural land uses such as	Include a definition for Rural Airstrip: means an area of land in the rural zone used for agricultural aviation activities.

				rural production.It would be useful to have a definition for rural airstrip so it is clear what facilities are included as such.	
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New Zealand Agricultural Aviation Association (S166)	S166.012	Definitions	Amend	NZAAA seeks to have clarity relating to helicopter landing areas	Include a definition for Helicopter Landing Area: means any area of land, building, or structure intended or designed to be used, whether wholly or partly, for helicopter movement or servicing
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New Zealand Agricultural Aviation Association (S166)	S166.013	Interpretation	Amend	There are a number of places in the plan that uses the term 'rural production' which is not defined. If the term "rural production" is to be used it should be defined as including agricultural, pastoral, horticultural, or forestry activities, essentially as a subset of primary production from the National Planning Standards.	Include a definition for Rural Production: means agricultural, pastoral, horticultural, or forestry activities.
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New Zealand Agricultural Aviation Association (S166)	S166.014	ECO - P8	Amend	There should be recognition in the Plan that vegetation may need to be removed for weed, pest, biosecurity, and biodiversity purposes.	Include an additional clause in ECO-P8: f) providing for clearance of weeds and pests for biosecurity and biodiversity purposes.
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New Zealand Agricultural Aviation Association (S166)	S166.015	ECO - R1	Amend	NZAAA submits that limiting native vegetation clearance in improved pastures would adversely affect the viability of rural production land.	Delete ECO—R1 5 (i) and (ii) and replace them with: 5. Within the Buller and Westland Districts: Indigenous vegetation clearance where it is within an area of improved pasture
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New Zealand Agricultural Aviation Association (S166)	S166.016	ECO - R1	Amend	NZAAA seeks to have the clearance of native vegetation in improved pastures added as a permitted activity in the Westland and Buller districts.	Delete Advice Note item #1
New Zealand Agricultural Aviation Association (S166)	S166.017	NC - P4	Support in part	Policy NC-P4 seeks to encourage the restoration and enhancement of the natural character of the riparian margins of lakes, rivers, and wetlands. NZAAA supports the policy, noting that weeds and pests are a significant threat to the natural character of the riparian margins of lakes, rivers, and wetlands. NZAAA seeks to have weed and pest control acknowledged in the policy.	Retain NC-P4 and add the words: including weed and pest control.

New Zealand Agricultural Aviation Association (S166)	S166.018	NC - R1	Amend	There should be provision in the rules for the clearance of weeds and pests and for biosecurity purposes within the riparian margins	Amend NC-R1 by adding: 1. k) clearance of weeds and pests and for biosecurity purposes
New Zealand Agricultural Aviation Association (S166)	S166.019	NOISE - O1	Support	An objective that recognises that the benefits of noise-generating activities are provided for is supported.	Retain NOISE-O1
New Zealand Agricultural Aviation Association (S166)	S166.020	NOISE - O1	Support	An objective that recognises that the benefits of noise-generating activities are provided for is supported.	Retain NOISE-O1
New Zealand Agricultural	S166.021	NOISE - O2	Support	An objective that recognises that existing and permitted noise-	Retain NOISE-O2

Aviation Association (S166)				generating activities are not compromised by adverse effects including reverse sensitivity effects from noise-sensitive activities is supported.	
New Zealand Agricultural Aviation Association (S166)	S166.022	NOISE - P1	Support	A policy that enables the generation of noise when it is of a type, character, scale and level that is appropriate to the zone is supported.	Retain NOISE-P1
New Zealand Agricultural Aviation Association (S166)	S166.023	NOISE - R1	Amend	General standard 5) applies NZS6807:1994 to helicopter landing areas. The standard is not appropriate for intermittent use of helicopter landing areas for agricultural aviation activities which are exempted from the noise standards in NOISE-R2.	Amend NOISE-R1 5) by adding: Unless otherwise exempted in NOISE-R2.

<p>New Zealand Agricultural Aviation Association (S166)</p>	<p>S166.024</p>	<p>NOISE - R2</p>	<p>Amend</p>	<p>NZAAA supports the intent of the rule which permits infrequent aircraft landing for rural production purposes on an intermittent basis, including aerial topdressing and helicopter movements as an exemption to the zone noise rules. NZAAA further seeks to have infrequent aircraft landing and helicopter movements for plantation forestry, biosecurity, and biodiversity included in the exemption to the zone noise rules and seeks an amendment that encompasses these activities.</p>	<p>Amend NOISE-R2 12) as follows:</p> <p>Infrequent aircraft take-offs and landings for agricultural aviation activities on an intermittent basis for rural production and conservation activities including biosecurity and biodiversity activities.</p>
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New Zealand Agricultural Aviation Association (S166)	S166.025	OSRZ - P7	Support	The policy supports the biodiversity values of the region.	Retain OSRZ - P7
New Zealand Agricultural Aviation Association (S166)	S166.026	OSRZ - P13	Support	OSRZ-P13 provides for agricultural, horticultural or pastoral activities in the zone. NZAAA supports this inclusion, which includes the intermittent use of aircraft for agricultural aviation activities.	Retain OSRZ-P13.
New Zealand Agricultural Aviation Association (S166)	S166.027	OSRZ - P19	Support	The policy supports the biodiversity values of the region.	Retain OSRZ - P19

New Zealand Agricultural Aviation Association (S166)	S166.028	Note with Regard to Plantation Forestry	Support in part	It is recognised that the NES-PF applies to forestry activities in rural areas. However, the NES-PF does not include provisions relating to the use of aircraft so forestry production activities need to be explicitly included in provisions for agricultural aviation activities to enable the use of aircraft for forestry production purposes.	Amend the note re plantation forestry to ensure that forestry production activities include the use of agricultural aviation. OR Amend the plan to ensure that agricultural aviation activities are part of forestry production activities .
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New Zealand Agricultural Aviation Association (S166)	S166.029	RURZ - O1	Support	NZAAA supports Objective RURZ -O1 that seeks to provide for a range of activities, uses and developments that maintain the amenity and rural character values of the rural environment, while retaining highly productive land and rural activities, and supporting a productive rural working environment.	Retain objective RURZ-O1
New Zealand Agricultural Aviation Association (S166)	S166.030	RURZ - P1	Support in part	The policy seeks to enable a variety of activities to occur within the RURZ while maintaining rural amenities and character. Part of the rural character in the RURZ is the noises, smells, and odours that occur as part of rural production activities. These should be specifically recognised in the description of the character of the rural area.	Amend RURZ-P1 by adding: g) Be consistent with the level of noise and odour from rural production activities.

New Zealand Agricultural Aviation Association (S166)	S166.031	RURZ - P15	Support	This policy is supported as important to enable existing activities to maintain support to rural production activities and the economy of the region.	RURZ-P15
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New Zealand Agricultural Aviation Association (S166)	S166.032	RURZ - P26	Support	This policy is supported as it recognises the importance of these facilities to rural land uses but amendments are sought to better reflect the rural production and conservation activities	Amend RURZ-P26: Provide for the development and use of ancillary infrastructure such as rural airstrips and helicopter landing areas which support rural land uses including rural production, conservation, and recreation.
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New Zealand Agricultural Aviation Association (S166)	S166.033	RURZ - P27	Support	RURZ-P27 appears to provide for airfields and helicopter landing areas for activities other than rural production and conservation, which are provided for in RURZ-P26. NZAAA seeks amendments so that it is clear that Policy RURZ-27 is distinct to RURZ-P26 which provides for agricultural aviation activities.	Amend RURZ-P27: Manage the location and operation of airfield and helicopter landing areas within the rural area for activities other than rural production, and conservation to provide for the amenity values of the surrounding rural and settlement areas.
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New Zealand Agricultural Aviation Association (S166)	S166.034	RURZ - P28	Support	RURZ-P28 is supported as it provides for agricultural aviation activities. But NZAAA seeks that the policy refer to agricultural aviation activities (which is sought to be defined) which provide for rural production and conservation activities in the rural zone.	Amend RURZ-P28: Enable aircraft movements within the rural area for agricultural aviation activities ancillary to rural production and conservation activities on a seasonal and short-term basis.
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New Zealand Agricultural Aviation Association (S166)	S166.035	Note with Regard to Plantation Forestry	Support in part	Amend RURZ-P28:Enable aircraft movements within the rural area for agricultural aviation activities ancillary to rural production and conservation activities on a seasonal and short-term basis.	Amend The Note for Plantation Forestry to state: Intermittent use of agricultural aircraft for forestry production purposes is permitted.
New Zealand Agricultural Aviation Association (S166)	S166.036	GRUZ - R1	Support	The rule provides for Agricultural, pastoral or horticultural activities and buildings to be permitted subject to standards. The rule would include agricultural aviation activities as they are included in the definition of Agricultural, horticultural and pastoral farming activities.	Retain GRUZ-R1
New Zealand Agricultural Aviation Association (S166)	S166.037	GRUZ - R2	Support in part	NZAAA seeks that use of aircraft for intermittent activities is included in the definition of conservation activities. Inclusion in the definition will ensure that agricultural aviation activities for conservation purposes can be undertaken for conservation activities.	Retain GRUZ-R2
New Zealand Agricultural Aviation Association (S166)	S166.038	AGRICULTURAL, PASTORAL AND HORTICULTURAL ACTIVITIES	Amend		Amend the Definition of agricultural, pastoral and horticultural activities as follows: k) intermittent use of rural airstrips and landing areas by aircraft undertaken for agricultural aviation activities

New Zealand Agricultural Aviation Association (S166)	S166.039	AGRICULTURAL, PASTORAL AND HORTICULTURAL ACTIVITIES	Amend	NZAAA notes that there are no provisions for the use of aircraft for forestry, biosecurity, or biodiversity (conservation) purposes. The use of aircraft is not provided for in the NES-PF. NZAAA seeks the addition of agricultural aviation activities in k) of the definition.	Amend definition to include agricultural aviation activities
New Zealand Coal & Carbon Limited (S472)	S472.001	Mineral Extraction	Support	We wish to ensure that the significance of mineral prospecting, exploration and extraction activities to the West Coast Region are expressly recognised and that these activities are able to operate efficiently and effectively (and in a way which their functional and operational needs are recognised), including through securing resource consents as appropriate.	Retain the strategic objectives for mineral extraction as notified.
New Zealand Coal & Carbon Limited (S472)	S472.002	Ecosystems and Indigenous Biodiversity	Oppose in part	We understand the intent with the overlays were to exclude those areas containing existing activities. These need to be amended to exclude the full extent of existing, lawfully established and/or approved areas of activity. These overlays and the provisions in relation to these will apply to mineral extraction activities	Amend the Significant Natural Areas overlays to exclude Roa Mining Company Ltd, Francis Mining Co. Ltd and New Creek Mining Ltd mining areas from the overlay

				both within and outside of the Mineral Extraction Zone. We seek a consenting pathway and access to the effects management hierarchy for our current and future activities such that they are not unnecessarily restricted	
New Zealand Coal & Carbon Limited (S472)	S472.003	Natural Features and Landscapes	Oppose in part	We understand the intent with the overlays were to exclude those areas containing existing activities. These need to be amended to exclude the full extent of existing, lawfully established and/or approved areas of activity. These overlays and the provisions in relation to these will apply to mineral extraction activities both within and outside of the Mineral Extraction Zone. We seek a consenting pathway and access to the effects management hierarchy for our current and future activities such that they are not unnecessarily restricted.	Amend the Outstanding Natural Landscape overlay to exclude Roa Mining Company Ltd, Francis Mining Co. Ltd and New Creek Mining Ltd mining areas from the overlay
New Zealand Coal & Carbon Limited (S472)	S472.004	EARTHWORKS	Oppose in part	Earthworks are part of mineral prospecting, exploring and extraction activities and as such would be addressed by those associated Rules.	Insert at the end of the definition an exclusion, or provide similar relief.Suggested wording is “This excludes earthworks associated with mineral prospecting, exploration and extraction activities.”

New Zealand Coal & Carbon Limited (S472)	S472.005	MINERAL EXTRACTION	Support in part	On the ground access is not limited to that within a site and provision is required for access to and between sites, be they exploration, mine or ancillary. For example, there may be an off (mine) site water treatment or mineral handling facility that is linked via an access road. In numerous cases mine sites are land locked and have access roads to them. These all form part of the mineral extraction activities.	Insert “, to and between ” after the words “access within”.
New Zealand Coal & Carbon Limited (S472)	S472.006	MIN - O1	Support		Retain as notified
New Zealand Coal & Carbon Limited (S472)	S472.007	MIN - O2	Support		Retain as notified
New Zealand Coal & Carbon Limited (S472)	S472.008	MIN - O3	Support		Retain as notified

New Zealand Coal & Carbon Limited (S472)	S472.009	MIN - O4	Support		Retain as notified
New Zealand Coal & Carbon Limited (S472)	S472.010	MIN - O6	Support		Retain as notified
New Zealand Coal & Carbon Limited (S472)	S472.011	NENV - O3	Oppose in part	Activities other than infrastructure are located or may need to be located in these areas.	At item b. insert “and activities” after the words “infrastructure”.
New Zealand Coal & Carbon Limited (S472)	S472.012	SASM - R15	Oppose in part	We would welcome the provision of a discretionary activity status which would enable a consenting pathway and access to the effects management hierarchy, thereby allowing for a case by case consideration of the activity and the SAMS together with the mitigation and/or protection required.	Change the activity status of these rules from Non-Complying to Discretionary.
New Zealand Coal & Carbon	S472.013	ECO- O2	Oppose in part	Provide for mitigation where this is possible.	Insert at end “or if not where adverse effects can be mitigated”

Limited (S472)					
New Zealand Coal & Carbon Limited (S472)	S472.014	ECO - P2	Oppose in part	At item e. insert at end “or where adverse effects can be mitigated”.	Provide for mitigation where this is possible.
New Zealand Coal & Carbon Limited (S472)	S472.015	ECO - P6	Oppose in part	Using the word avoid may prevent the use of the effects management hierarchy, given the case law definition of this, and/or be inconsistent with the Regional Policy Statement.	Delete the word “avoid”.
New Zealand Coal & Carbon Limited (S472)	S472.016	ECO - P7	Oppose in part	In practice management alone can also lead to the desired outcome. This ties into ECO-P8.	At item b. insert the word or after the words “protection and”.
New Zealand Coal & Carbon Limited (S472)	S472.017	ECO - R4/SUB - R7	Support in part		Retain the Discretionary activity status of ECO-R7.
New Zealand Coal & Carbon	S472.018	NFL - O1	Support in part		Support providing for “use and development”.

Limited (S472)					
New Zealand Coal & Carbon Limited (S472)	S472.019	NFL - P2	Support in part		Support ability to remedy, mitigate or offset effects of activities within ONLs and ONFs.
New Zealand Coal & Carbon Limited (S472)	S472.020	ECO - P5	Support in part	Support in part.Support e.	Retain e. as notified.
New Zealand Coal & Carbon Limited (S472)	S472.021	NFL - R15	Support		Retain the Discretionary activity status of NFL-R15.
New Zealand Coal & Carbon Limited (S472)	S472.022	NFL - R15	Oppose in part	Appears to be a drafting error as no flow on from Controlled rules.	In the heading insert "Controlled" after the word "Permitted".
New Zealand Coal & Carbon Limited (S472)	S472.023	EW - R8	Support in part		Retain the Restricted Discretionary activity status of EW-R8.

New Zealand Coal & Carbon Limited (S472)	S472.024	OSRZ - O1	Oppose in part	Not all activities in these zones will “complement” and provision is required where this doesn’t occur.	Insert “ where possible ” after the word “should”.
New Zealand Coal & Carbon Limited (S472)	S472.025	OSRZ - P9	Support in part		Support f.
New Zealand Coal & Carbon Limited (S472)	S472.026	OSRZ - P14	Oppose in part	Mineral extraction may not be provided for in the management plan referenced at b.	Delete b.

New Zealand Coal & Carbon Limited (S472)	S472.027	OSRZ - Open Space and Recreation Zones Policies	Oppose in part	Mineral extraction activities also occur in the NOSZ – Natural Open Space Zone. Mineral extraction may not be provided for in the management plan referenced at b.	Insert wording of ORSZ-P14 as a new ORSZ P21 under Natural Open Space Zone BUT: <ul style="list-style-type: none">• change the words OSZ-Open Space Zone to NOSZ-Natural Open Space Zone; and• delete b.
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New Zealand Coal & Carbon Limited (S472)	S472.028	NOSZ - R16	Oppose in part	Some land within the NOSZ is currently used for mineral extraction. We request a consenting pathway and access to the effects management hierarchy, which the discretionary status would provide, thereby allowing for a case by case consideration of the activity. We also note the other robust regulatory mechanisms in place for some land held in this zone, for example an access arrangement with the Department of Conservation.	Change Rule status from Non-Complying to Discretionary.
New Zealand Coal & Carbon Limited (S472)	S472.029	NOSZ - R16	Oppose in part		Insert Mineral Prospecting and Exploration into the heading of the rule.
New Zealand Coal & Carbon Limited (S472)	S472.030	OSZ - R11	Oppose in part	Some drill programs go for longer than 3 months so may not be practical to rehabilitate in this timeframe.	Under 3. increase the timeframe to 1 year.
New Zealand Coal & Carbon Limited (S472)	S472.031	OSZ - R22	Support in part		Retain the Discretionary activity status of OSZ-R22.

New Zealand Coal & Carbon Limited (S472)	S472.032	OSZ - R22	Oppose in part		Insert Mineral Prospecting and Exploration into the heading of the rule.
New Zealand Coal & Carbon Limited (S472)	S472.033	RURZ - O5	Support		Retain as notified
New Zealand Coal & Carbon Limited (S472)	S472.034	Mineral Extraction	Support		Retain Mineral Extraction Policies as notified
New Zealand Coal & Carbon Limited (S472)	S472.035	GRUZ - R11	Oppose in part	Some drill programs go for longer than 3 months so may not be practical to rehabilitate in this timeframe.	Under 3. increase the timeframe to 1 year.
New Zealand Coal & Carbon Limited (S472)	S472.036	GRUZ - R32	Support in part		Support the Discretionary activity status of GRUZ-R32.
New Zealand Coal &	S472.037	Mineral Extraction Zone	Support		Retain the provision of a Mineral Extraction Zone (MINZ).

Carbon Limited (S472)					
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New Zealand Coal & Carbon Limited (S472)	S472.038	Overview	Support	There are a number of other authorisations not listed which are applicable so a broader refence would be more appropriate.	3rd para, 2nd sentence : <ul style="list-style-type: none">• delete “is from three different” and insert “includes the”.• delete “and includes” and insert “of”.
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New Zealand Coal & Carbon Limited (S472)	S472.039	Mineral Extraction Zone Objectives	Support		Retain as notified
New Zealand Coal & Carbon Limited (S472)	S472.040	Mineral Extraction Policies	Support		Retain as notified
New Zealand Coal & Carbon Limited (S472)	S472.041	MINZ - R1	Support in part	Some drill programs go for longer than 3 months so may not be practical to rehabilitate in this timeframe.	At Item 2. increase the timeframe to 1 year.
New Zealand Coal & Carbon Limited (S472)	S472.042	MINZ - R2	Support	Matters contained in Appendix 7 may also be covered by a number of other authorisations, not just those currently identified, so this provision requires broadening.	At Item 2. a. delete “ coal mining licence or resource consent ” and insert “ existing authorisations ”.
New Zealand Coal & Carbon Limited (S472)	S472.043	MINZ - R2	Support in part	Potential issues of overlap, conflicts and re- litigation of matters already settled. We understand the intent to be that these matters are addressed and not duplicated or re-litigated.	At Item 2. a. with respect to the Mineral Extraction Management Plan (Appendix 7) insert an Advice Note to say something along the lines of ... “ this process of certification is not to relitigate matters rather to check that what is required is there ”.

New Zealand Coal & Carbon Limited (S472)	S472.044	MINZ - R2	Support in part	There are instances where the land administrator or another regulator is the primary holder of the bond, e.g. Department of Conservation or Regional Council. This avoids unnecessary duplication of bonds.	At Item 6. Insert “or evidence that the bond is in place with another regulatory authority or land administrator” .
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New Zealand Coal & Carbon Limited (S472)	S472.045	MINZ - R3	Support in part	There are instances where the land administrator or another regulator is the primary holder of the bond, e.g. Department of Conservation or Regional Council.	At Item 4. increase the heavy vehicle movement to 100. At Item 6. Insert “or evidence that the bond is n place with another regulatory authority or land administrator” .
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New Zealand Coal & Carbon Limited (S472)	S472.046	MINZ - R6	Support		Retain as notified
New Zealand Coal & Carbon Limited (S472)	S472.047	MINZ - R7	Support	Support MINZ-R7 and the Restricted Discretionary activity status of MINZ-R7.	Retain as notified
New Zealand Coal & Carbon Limited (S472)	S472.048	SCHED9 - LAWFULLY ESTABLISHED MINERAL EXTRACTION AND PROCESSING AREAS	Support	An omission in drafting of the TTPP.	Add under the "Authorisation Mechanism" for Roa Mine Blackball and Rajah Mine Blackball of these mines resource consent numbers GDC resource consent 1422/06, GDC building consent 989139 and WCRC resource consents RC06166, RC10075 and RC01/92
New Zealand Coal & Carbon Limited (S472)	S472.049	Rezoning Requests	Oppose in part	A mapping error seems to have occurred with the Precinct and overlaps the Mineral Extraction Zone (MINZ) and its existing activities. This should match the zoning boundary which abuts the MINZ in that area.	Remove the overlap of the Precinct from the Mineral Extraction Zone (MINZ) for SEC 39 SO11207 TWN OF ROA BLK II MAWHERANUI SD (Valuation ID 2543020700) and SEC 48 SO 11207 BLK II MAWHERANUI SD (Valuation ID 2543020701).
New Zealand Coal & Carbon	S472.050	Ecosystems and Indigenous Biodiversity	Oppose in part	We understand the intent with the overlays were to exclude those areas containing existing activities.	Amend the maps of the overlay to exclude the full extent of existing, lawfully established and/or approved areas of activity

Limited (S472)					
New Zealand Coal & Carbon Limited (S472)	S472.051	Natural Features and Landscapes	Oppose in part	We understand the intent with the overlays were to exclude those areas containing existing activities	Amend the maps of the overlay to exclude the full extent of existing, lawfully established and/or approved areas of activity.
New Zealand Defence Force (S519)	S519.001	TEMPORARY MILITARY TRAINING ACTIVITY	Support	The proposed definition is consistent with the definition in the National Planning Standards (2019). NZDF supports the inclusion of this definition.	Retain definition as notified
New Zealand Defence Force (S519)	S519.002	TEMPORARY ACTIVITY	Support	The proposed definition of temporary activity specifically excludes TMTA, which is supported by NZDF given that the Plan as notified includes a definition of TMTA. TMTA are very different from other temporary events and activities, with different effects that need to be managed.	Retain definition as notified
New Zealand Defence Force (S519)	S519.003	Definitions	Oppose	NZDF is undertaking a nationwide project to ensure strategic defence facilities and infrastructure are appropriately recognised and provided for in district plans. Defence facilities are nationally and	Add 'defence facilities' to the definition of infrastructure as notified.

				regionally significant, playing an important role in both military training and civil and/or national defence operations. They are essential in enabling NZDF to meet its obligations under the Defence Act 1990. While NZDF does not currently have major facilities on the West Coast, this does not preclude the need for future defence infrastructure in the area. NZDF therefore requests that any defence facilities in the West Coast region are recognised and provided for in the District Plan as they are in many district plans throughout the country (including the Proposed Selwyn District Plan and the Auckland Unitary Plan Operative in Part).	
New Zealand Defence Force (S519)	S519.004	CRITICAL INFRASTRUCTURE	Support	NZDF supports that 'defence facilities' are included in the definition of critical infrastructure.	Retain definition as notified
New Zealand Defence Force (S519)	S519.005	EMERGENCY SERVICE FACILITY	Support	NZDF supports the inclusion of this definition, in particular the inclusion of emergency co-ordination facilities.	Retain definition as notified or wording to similar effect.
New Zealand Defence Force (S519)	S519.006	REVERSE SENSITIVITY	Support	NZDF supports the inclusion of this definition.	Retain definition as notified or wording to similar effect.

New Zealand Defence Force (S519)	S519.007	CR - O2	Support	It is important to support the continued function and resilience of critical infrastructure, including NZDF facilities	Retain Objective as notified or wording to similar effect.
New Zealand Defence Force (S519)	S519.008	CR - O4	Support	It is appropriate to provide for greater infrastructure self - sufficiency and the backup of critical infrastructure on the West Coast/Tai o Poutini.	Retain Objective as notified or wording to similar effect.
New Zealand Defence Force (S519)	S519.009	INF - O1	Support	NZDF considers that it is important to provide for the safe, efficient and sustainable development, operation and maintenance and upgrading of utilities and infrastructure, to meet the needs of the West Coast/Tai o Poutini.	Retain Objective as notified or wording to similar effect.
New Zealand Defence Force (S519)	S519.010	INF - O2	Support	It is important to protect infrastructure from the adverse of incompatible subdivision, land use and development.	Retain Objective as notified or wording to similar effect.
New Zealand Defence Force (S519)	S519.011	INF - O5	Support	It is important for the policy framework to recognise the functional and operational need of infrastructure along with the positive effects of infrastructure on the City, while acknowledging that infrastructure can have adverse	Retain Objective as notified or wording to similar effect.

				effects on the environment which need to be managed.	
New Zealand Defence Force (S519)	S519.012	INF - P1	Support	Recognising the positive social, economic, cultural and environmental benefits from the development, operation and upgrading of infrastructure is important and appropriate.	Retain Policy as notified or wording to similar effect.
New Zealand Defence Force (S519)	S519.013	INF - P3	Support	It is important for the Policy framework to require the management of reverse sensitivity effects from subdivision, use and development, on utilities and infrastructure.	Retain Policy as notified or wording to similar effect.
New Zealand Defence Force (S519)	S519.014	TEMP - O1	Support	It is appropriate to recognise the benefits of temporary activities, including TMTA, which contribute to the wellbeing of the community.	Retain Policy as notified or wording to similar effect.
New Zealand Defence Force (S519)	S519.015	TEMP - P2	Support	It is important for NZDF to be able to undertake TMTA across a wide range of locations while ensuring effects on amenity values and the environment are minimised.	Retain Policy as notified or wording to similar effect.
New Zealand Defence Force (S519)	S519.016	Temporary Activities Rules	Support	It is appropriate to provide for TMTA as a permitted activity in the District-wide Matters Chapter, which applies across all zones in the Plan.	Retain permitted activity rule status as notified.

<p>New Zealand Defence Force (S519)</p>	<p>S519.017</p>	<p>TEMP - R1</p>	<p>Amend</p>	<p>TMTA are by their very nature temporary, ranging from a period of days through to several weeks on an intermittent or continuous basis depending on the nature of the activity. NZDF does not consider it necessary or appropriate to impose a time limit on TMTA as per TEMP – R1 Standard (1). However, NZDF would support an amendment to this standard to allow TMTA to be undertaken so as not exceed a period of 31 consecutive days (excluding set up and pack down activities). This would also ensure a consistent approach to TMTA is adopted nationwide. Many district plans around the country are being or have been reviewed and NZDF is engaging in those review processes to ensure that where training activities might be subject to controls through a district plan, those controls are consistent, and that compliance is simply achieved and assessed.</p>	<p>Amend Standard TEMP – R1 Standard (1) to state (additions shown underlined): These are for a maximum of 31 <u>consecutive</u> days per year; (excluding set up and pack down activities);</p>
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New Zealand Defence Force (S519)	S519.018	TEMP - R1	Support	<p>From time to time, and at the landowner’s request, buildings or structures constructed as part of a TMTA may be permanent and not removed at the conclusion of the training exercise, provided it is a permitted activity, or a resource consent obtained. Buildings or structures constructed as part of TMTA should not be required to be removed when they are intended to be permanent and meet relevant permitted activity rules in the Plan (or otherwise a resource consent is obtained in accordance with the relevant Plan rules). This is foreshadowed by the explanatory note in the Temporary Activities Rules section which states that “there may be a number of Plan provisions that apply to an activity, building, structure and site. In some cases, consent may be required under rules in this Chapter as well as rules in other Chapters in the Plan.”</p>	Retain Standard as notified or wording to similar effect.
New Zealand Defence Force (S519)	S519.019	TEMP - R1	Support	Occasionally TMTA involve minor earthworks. As above, this should be recognised and provided for where	Retain Standard as notified or wording to similar effect.

				relevant permitted activities elsewhere in the Plan can be complied with, or a resource consent is obtained.	
New Zealand Defence Force (S519)	S519.020	TEMP - R1	Amend	NZDF seeks to amend Permitted Activity Standard (4), which states that TMTA is a permitted activity where these “do not occur on a Site or Area of Significance to Māori identified in Schedule Three”. This standard is not consistent with TMTA Permitted Activity Rules in other district plans across New Zealand. Furthermore, this standard contradicts Rule SASM - R5 Standard (2), which states that Temporary Events on Sites and Areas in Schedule Three - Sites and Areas of Significance to Māori that are temporary events and activities in accordance with the Temporary Activities Chapter are a permitted activity, providing they comply with Standard (3), which requires that for works on listed SASM, written approval from the relevant Poutini Ngāi Tahu rūnanga is provided to the relevant District Council at least 10	Amend Standard (4) to state: These do not occur on a Site or Area of Significance to Māori identified in Schedule Three unless written approval from the relevant Poutini Ngāi Tahu rūnanga is provided to the relevant District Council at least 10 working days prior to the activities commencing.

				working days prior to the activities commencing.	
New Zealand Defence Force (S519)	S519.021	TEMP - R7	Support	NZDF supports a Controlled Activity status for TMTA that do not meet the Permitted Activity standards of Rule TEMP R1. NZDF considers that this activity status is appropriate where the effects are known, and should apply when any of the permitted activity standards are not met (i.e. standards (1) – (4)), noting that as per Submission Point 20, NZDF requests that Permitted Activity Standard (4) is amended.	Retain Rule and controlled activity status as notified
New Zealand Defence Force (S519)	S519.022	TEMP - R7	Oppose	The matters of control for TMTA that require consent as a controlled activity, as listed under TEMP-R7 are not considered suitable or appropriate given the inherent nature of TMTA. TMTA are temporary by their very nature and may include a broad range of activities as outlined in the introduction to this submission. Many TMTA have effects similar to other day-to-day activities and training activities carried out by other emergency services and	Delete the matters of control as notified.

			<p>civilian organisations, such as the Police Force, search and rescue organisations and Fire and Emergency NZ. The only effect from TMTA which requires specific management is noise. In this regard, NZDF has developed appropriate controls to manage noise effects from TMTA outlined in Submission Point 28 below. Given the nature of TMTA i.e. that they are not public events held in public spaces and outdoor events venues, it is not appropriate to require resource consent applications for TMTA to consider the adverse effects on visual amenity from neighbouring properties or public places. Similarly, it is not appropriate to require assessment of traffic safety. Depending on the nature of a TMTA, they may not involve any traffic movements or effects on pedestrians. The assessment criteria as notified may be more appropriate for other temporary events, such as parades held on public streets or in public spaces, or community,</p>	
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				recreational or sporting orientated events but are not considered to be relevant to TMTA, which are very closely managed by NZDF and do not generally give rise to any particular traffic or visual amenity effects. The location and design of TMTA are tightly controlled, and reflect the specific activities being undertaken. The requirement for Council to have control over the location and design of TMTA is overly onerous and would be more appropriate in relation to permanent activities / structures.	
New Zealand Defence Force (S519)	S519.023	NOISE - O1	Support	It is appropriate to recognise the benefits of noise generating activities and provide for these in a way that is compatible with the role, function and character of each zone.	Retain Objective as notified or wording to similar effect.
New Zealand Defence Force (S519)	S519.024	NOISE - O2	Support	It is appropriate that the function and operation of existing and permitted noise generating activities are not compromised by reverse sensitivity effects from noise-sensitive activities.	Retain Objective as notified or wording to similar effect.
New Zealand Defence Force (S519)	S519.025	NOISE - R1	Support	NZDF supports the noise from helicopter landing areas being a permitted activity in all zones	Retain Rule as notified.

				provided that it meets the recommended limits and noise management provisions as set out in NZS 6807: 1994 Noise Management and Land Use Planning for Helicopter Landing Areas. This is consistent with NZDF's bespoke noise standards for TMTA.	
New Zealand Defence Force (S519)	S519.026	NOISE - R2	Support	NZDF supports that compliance with the relevant noise standards does not apply to activities at emergency service facilities associated with emergency response and emergency response training.	Retain Clause as notified.
New Zealand Defence Force (S519)	S519.027	NOISE - R2	Support	NZDF supports that compliance with the relevant noise standards does not apply to helicopter movements associated with an emergency.	Retain Clause as notified
New Zealand Defence Force (S519)	S519.028	NOISE - R4	Support	NZDF supports a specific permitted activity rule for TMTA noise in the District Plan and the noise standards outlined in this Rule with respect to TMTA, which reflect NZDF's bespoke noise standards specifically developed to manage the particular noise characteristics of TMTA. The standards provide appropriate controls to manage noise effects	Retain Rule as notified.

				from TMTA (which include minimum separation distances and peak sound levels for both daytime and night-time periods), as well as NZDF's standard practice of informing nearby landowners and occupiers of properties. Based on these control methods, adverse noise effects in any zone can be appropriately mitigated.	
New Zealand Defence Force (S519)	S519.029	NOISE - R10	Support	NZDF supports Rule R10 Standard (6) which specifies that Standard 4 (noise generated from aircraft operations at Hokitika Airport) and Standard 5 (noise generated from helicopter operations at Franz Josef Heliport) does not apply to: (d) Military aircraft movements;	Retain Rule as notified.
New Zealand Defence Force (S519)	S519.030	NC - R1	Amend	NZDF seeks to amend Rule NC – R1 to provide for Indigenous Vegetation Clearance and Earthworks within the Riparian Margin of a River, Lake or Wetland associated with bridges and / or dams constructed as part of TMTA, as a permitted activity.	Amend Rule NC – R1 to state: Activity Status Permitted 1. Where this is outside of any Significant Natural Area identified in Schedule Four, and for: k. bridges and / or dams constructed as part of a Temporary Military Training Activity
New Zealand Defence Force (S519)	S519.031	NC - R2	Amend	NZDF seeks to amend Rule NC – R2 to provide for bridges and/or dams constructed within the Riparian	Amend Rule NC – R2 to state: Activity Status Permitted 1. Where the buildings and structures are:

				Margin of a River, Lake or Wetland, as part of TMTA, as a permitted activity.	h. Bridges and / or dams constructed as part of a Temporary Military Training Activity
New Zealand Defence Force (S519)	S519.032	NFL - R8	Amend	NZDF seeks to amend Rule NFL – R8 to provide for bridges and / or dams constructed within an Outstanding Natural Landscape described in Schedule Five, as part of TMTA, as a permitted activity.	Amend Rule NFL – R8 to state: Activity Status Permitted Where the structure is: 7. A bridge and / or a dam constructed as part of a Temporary Military Training Activity
New Zealand Defence Force (S519)	S519.033	Coastal Environment Rules	Amend	NZDF requests that a new rule is included in the Coastal Environment Chapter of the Proposed Plan to provide for TMTA as a permitted activity, providing compliance with relevant permitted activity standards and buildings and structures associated with TMTA meet the permitted activity standards of CE-R4 to CE – R11 as relevant.	Include a new Rule CE - RX to state: Temporary Military Training Activity within the Coastal Environment Activity Status Permitted Advice Note: 1. Any indigenous vegetation clearance associated with a Temporary Military Training Activity is subject to the provisions in the Ecosystems and Indigenous Biodiversity Chapter. 2. Works shall not undermine or have an adverse effect on any hazard mitigation /protection measure that exists within the coastal environment. 3. All buildings and structures associated with TMTA shall meet the permitted activity standards of CE-R4 to CE – R11 as relevant. 4. Where activities occur within Scheduled areas included within other Overlay Chapter Areas, then the relevant Overlay Chapter Rules also apply. Activity status where compliance not achieved: Restricted Discretionary

New Zealand Defence Force (S519)	S519.034	EW - R2	Oppose	<p>Rule EW - R2 includes provision for permitted earthworks across all zones for a small number of specifically listed activities only. Rules EW – R3 – R6 outline additional permitted earthworks across the respective District Plan zones. The effect of Rule EW – R2 appears to be that earthworks for activities which are not specifically identified would require consent, regardless of how minor / small-scale these earthworks are, including where they meet the permitted activity standards in Rule EW – R1. Similarly, earthworks for activities which are permitted in Rules EW R3 – R6 may require consent under Rule EW – R2. This does not reflect an ‘effects-based’ approach as anticipated by the RMA.</p>	<p>Review the general permitted activity earthworks rules to ensure that all activities that comply with the relevant standards can proceed on a permitted activity basis i.e. not just the activities that are specifically identified. Delete Rule EW – R2 and include the standards in Rule EW – R2 in the other earthworks rules as appropriate.</p>
New Zealand Energy Limited (S463)	S463.001	Energy	Support	<p>While we support the provisions outlined in the Energy section of the plan, we consider that existing Hydroelectric Infrastructure should be included as a Special Purpose Zone similar to that provided for Mineral Extraction.</p>	<p>Provide for existing Hydroelectric Infrastructure in a specific special zone</p>

New Zealand Energy Limited (S463)	S463.002	SPZ - Special Purpose Zones	Amend	We consider that this is consistent with the requirements to give effect to West Coast Regional Policy Statement and the National Policy Statement for Renewable Electricity Generation 2011. The case supporting this change is outlined in detail in the full submission.	Include a new special purpose zone for existing hydroelectric infrastructure in the Plan. This could be modelled on the Queenstown Lakes or Otago District Plan special zones.
New Zealand Energy Limited (S463)	S463.003	Energy	Amend	This would be consistent with the WCRPS and NPS Renewable Electricity Generation. There are a number of examples of hydroelectric assets being included in Special Zones in other District Plans in New Zealand. We have provided two examples including the current Queenstown Lakes District Plan and The Central Otago District Plan. Extracts of these Plans are included in the detailed submission,	Provide rules for existing hydroelectric infrastructure within a special purpose zone similar to those in the Queenstown Lakes or Central Otago District Plan
New Zealand Energy Limited (S463)	S463.004	FC - R12	Oppose	While we understand the requirements for financial contributions to support additional operational requirements or provision of new infrastructure, we consider that conditions or costs imposed to remedy or mitigate adverse effects, on environmental,	Remove the provisions relating to seeking financial contributions on land use consents to remedy or mitigate adverse effects on environmental, natural landscape and biodiversity values.

				natural landscape and biodiversity values, should be managed through Regional Council consents	
New Zealand Heavy Haulage Association Inc (S616)	S616.001	COMZ - R4	Amend	That Council retain a degree of control over relocated buildings through the use of performance standards	<p>Amend permitted activity status to read:</p> <p>...</p> <p>2. Any relocated building intended for use as a dwelling must have previously been designed, and built to be and used as a dwelling.</p> <p>3. A building pre-inspection report shall accompany the application for a building consent for the destination site. That report is to identify all reinstatement works that are to be completed to the exterior of the building. The report shall include a certification by the property owner that the reinstatement works shall be completed within a the specified [12] month period.</p> <p>4. The building shall be located on permanent foundations approved by building consent, no later than [2] months of the building being moved to the site.</p> <p>5. All other reinstatement work required by the building inspection report and the building consent to reinstate the exterior of any relocated dwelling shall</p>

					be completed within [12]months of the building being delivered to the site. Without limiting (c) (above) This reinstatement work is to include connections to all infrastructure services and closing in and ventilation of the foundations.
New Zealand Heavy Haulage Association Inc (S616)	S616.002	MUZ - R8	Amend	That Council retain a degree of control over relocated buildings through the use of performance standards	Amend permitted activity status to read: ... 2. Any relocated building intended for use as a dwelling must have previously been designed, and built to be and used as a dwelling. 3. A building pre-inspection report shall accompany the application for a building consent for the destination site. That report is to identify all reinstatement works that are to be completed to the exterior of the building. The report shall include a certification by the property owner that the reinstatement works shall be completed within a the specified [12] month period. 4. The building shall be located on permanent foundations approved by building consent, no later than [2] months of the building being moved to the site.

					5. All other reinstatement work required by the building inspection report and the building consent to reinstate the exterior of any relocated dwelling shall be completed within [12] months of the building being delivered to the site. Without limiting (c) (above) This reinstatement work is to include connections to all infrastructure services and closing in and ventilation of the foundations.
New Zealand Heavy Haulage Association Inc (S616)	S616.003	NCZ - R4	Amend	That Council retain a degree of control over relocated buildings through the use of performance standards	Amend permitted activity status to read: ... 2. Any relocated building intended for use as a dwelling must have previously been designed, and built to be and used as a dwelling. 3. A building pre-inspection report shall accompany the application for a building consent for the destination site. That report is to identify all reinstatement works that are to be completed to the exterior of the building. The report shall include a certification by the property owner that the reinstatement works shall be completed within a the specified [12] month period. 4. The building shall be located on permanent foundations approved by building consent, no later

					<p>than [2] months of the building being moved to the site.</p> <p>5. All other reinstatement work required by the building inspection report and the building consent to reinstate the exterior of any relocated dwelling shall be completed within [12] months of the building being delivered to the site. Without limiting (c) (above) This reinstatement work is to include connections to all infrastructure services and closing in and ventilation of the foundations.</p>
New Zealand Heavy Haulage Association Inc (S616)	S616.004	GRZ - R4	Amend	That Council retain a degree of control over relocated buildings through the use of performance standards	<p>Amend permitted activity status to read:</p> <p>...</p> <p>2. Any relocated building intended for use as a dwelling must have previously been designed, and built to be and used as a dwelling.</p> <p>3. A building pre-inspection report shall accompany the application for a building consent for the destination site. That report is to identify all reinstatement works that are to be completed to the exterior of the building. The report shall include a certification by the property owner that the reinstatement works shall be completed within a the specified [12] month period.</p>

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New Zealand Heavy Haulage Association Inc (S616)	S616.005	LLRZ - R4	Amend	That Council retain a degree of control over relocated buildings through the use of performance standards	<p>Amend permitted activity status to read: ...2. Any relocated building intended for use as a dwelling must have previously been designed, and built to be and used as a dwelling.</p> <p>3. A building pre-inspection report shall accompany the application for a building consent for the destination site. That report is to identify all reinstatement works that are to be completed to the exterior of the building. The report shall include a certification by the property owner that the reinstatement works shall be completed within a the specified [12] month period.</p>

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New Zealand Heavy Haulage Association Inc (S616)	S616.006	MRZ - R4	Amend	That Council retain a degree of control over relocated buildings through the use of performance standards	<p>Amend permitted activity status to read: ... 2. Any relocated building intended for use as a dwelling must have previously been designed, and built to be and used as a dwelling.</p> <p>3. A building pre-inspection report shall accompany the application for a building consent for the destination site. That report is to identify all reinstatement works that are to be completed to the exterior of the building. The report shall include a certification by the property owner that the reinstatement works shall be completed within a thespecified [12] month period.</p>

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New Zealand Heavy Haulage Association Inc (S616)	S616.007	GRUZ - R7	Amend	That Council retain a degree of control over relocated buildings through the use of performance standards	<p>Amend permitted activity status to read: ...</p> <p>2. Any relocated building intended for use as a dwelling must have previously been designed, and built to be and used as a dwelling.</p> <p>3. A building pre-inspection report shall accompany the application for a building consent for the destination site. That report is to identify all reinstatement works that are to be completed to the exterior of the building. The report shall include a certification by the property owner that the reinstatement works shall be completed within a the specified [12] month period.</p>

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New Zealand Heavy Haulage Association Inc (S616)	S616.008	RLZ - R7	Amend	That Council retain a degree of control over relocated buildings through the use of performance standards	<p>Amend permitted activity status to read: ...</p> <p>2. Any relocated building intended for use as a dwelling must have previously been designed, and built to be and used as a dwelling.</p> <p>3. A building pre-inspection report shall accompany the application for a building consent for the destination site. That report is to identify all reinstatement works that are to be completed to the exterior of the building. The report shall include a certification by the property owner that the reinstatement works shall be completed within a the specified [12] month period.</p>

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New Zealand Heavy Haulage Association Inc (S616)	S616.009	SETZ - R8	Amend	That Council retain a degree of control over relocated buildings through the use of performance standards	<p>Amend permitted activity status to read: ...</p> <p>2. Any relocated building intended for use as a dwelling must have previously been designed, and built to be and used as a dwelling.</p> <p>3. A building pre-inspection report shall accompany the application for a building consent for the destination site. That report is to identify all reinstatement works that are to be completed to the exterior of the building. The report shall include a certification by the property owner that the reinstatement works shall be completed within a the specified [12] month period.</p>

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New Zealand Heavy Haulage Association Inc (S616)	S616.010	FUZ - R6	Amend	That Council retain a degree of control over relocated buildings through the use of performance standards	<p>Amend permitted activity status to read: ...</p> <p>2. Any relocated building intended for use as a dwelling must have previously been designed, and built to be and used as a dwelling.</p> <p>3. A building pre-inspection report shall accompany the application for a building consent for the destination site. That report is to identify all reinstatement works that are to be completed to the exterior of the building. The report shall include a certification by the property owner that the reinstatement works shall be completed within a the specified [12] month period.</p>

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New Zealand Heavy Haulage Association Inc (S616)	S616.011	HOSZ - R6	Amend	That Council retain a degree of control over relocated buildings through the use of performance standards	<p>Amend permitted activity status to read: ...</p> <p>2. Any relocated building intended for use as a dwelling must have previously been designed, and built to be and used as a dwelling.</p> <p>3. A building pre-inspection report shall accompany the application for a building consent for the destination site. That report is to identify all reinstatement works that are to be completed to the exterior of the building. The report shall include a certification by the property owner that the</p>

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New Zealand Heavy Haulage Association Inc (S616)	S616.012	STADZ - R4	Amend	That Council retain a degree of control over relocated buildings through the use of performance standards	<p>Amend permitted activity status to read: ...</p> <p>2. Any relocated building intended for use as a dwelling must have previously been designed, and built to be and used as a dwelling.</p> <p>3. A building pre-inspection report shall accompany the application for a building consent for the destination site. That report is to identify all reinstatement works that are to be completed to the exterior of the building. The report shall include a certification by the property owner that the</p>

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New Zealand Heavy Haulage Association Inc (S616)	S616.013	MPZ - R7	Amend	That Council retain a degree of control over relocated buildings through the use of performance standards	<p>Amend permitted activity status to read: ...</p> <p>2. Any relocated building intended for use as a dwelling must have previously been designed, and built to be and used as a dwelling.</p> <p>3. A building pre-inspection report shall accompany the application for a building consent for the destination site. That report is to identify all reinstatement works that are to be completed to the exterior of the building. The report shall include a certification by the property owner that the</p>

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New Zealand Heavy Haulage Association Inc (S616)	S616.014	SVZ - R4	Support		<p>Amend permitted activity status to read: ...</p> <p>2. Any relocated building intended for use as a dwelling must have previously been designed, and built to be and used as a dwelling.</p> <p>3. A building pre-inspection report shall accompany the application for a building consent for the destination site. That report is to identify all reinstatement works that are to be completed to the exterior of the building. The report shall include a certification by the property owner that the</p>

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New Zealand Heavy Haulage Association Inc (S616)	S616.015	Whole plan	Support	The Proposed Plan provides for relocated buildings as a permitted activity in most zones,	Retain provisions for relocated buildings
New Zealand Motor Caravan Association (S490)	S490.001	Temporary Activities	Amend	Camping is an important economic activity on the West Coast and should have appropriate objectives/policies/rules.	Include objectives, policies and rules for camping in the Plan.

New Zealand Motor Caravan Association (S490)	S490.002	Whole plan	Amend	Camping could be caught under the "catch all" rules in the Plan and be a Discretionary Activity.	Specifically exclude camping from the Plan.
New Zealand Motor Caravan Association (S490)	S490.003	Temporary Activities Rules	Oppose	The approach to freedom camping in the plan is inconsistent with the Freedom Camping Act and is contrary to Section 76 (c) of the RMA. The rule and supporting analysis do not identify the effects to be managed, the rule is unreasonable as it contains a factual error, the proposal to require RDA consent for more than 2 nights camping is heavy handed regulation. Waka Kotahi is able to regulate freedom camping if necessary and this is outside the scope of a District Plan. No formal register of Permitted Freedom Camping sites exist - NZTA does not designate sites. Sites are formally described as Permitted everywhere where not Restricted or Prohibited. The approach undermines the intention of the Self Containment Bill.	Delete the rules relating to Freedom Camping

				Amendments to the Freedom Camping Act address any issues.	
New Zealand Motor Caravan Association (S490)	S490.004	BUILDING	Amend	The NPS definition of 'building' captures non-motorised caravans which are not capable of moving under their own power. NZMCA members use non-motorised caravans for the same purpose as motorised motorhomes, campervans, and house buses (which are not captured by the NPS definition). For the NZMCA and its more than 113,000 members (many of whom travel with non-motorised caravans), the NPS definition creates a number of potential implications, which stem from the fact that members with non-motorised caravans will, by definition, be using and parking in a 'building'.	We think it would clearer for readers of the TTPP if the definition of "building" explicitly excludes non-motorised caravans as follows: means a temporary or permanent movable or immovable physical construction that is: <ol style="list-style-type: none"> 1. partially or fully roofed; and 2. fixed or located on or in land; but excludes: any motorised vehicle, or other mode of transport that could be moved under its own power, or non-motorised caravans other than those used for a residential accommodation/ business purpose for a continuous period of more than two (2) months.
New Zealand Motor Caravan Association (S490)	S490.005	Whole plan	Amend	The TTPP's treatment of camping grounds is somewhat incomplete and inconsistent. Some attention should be given to ensuring that definitions of terms used in various zone rules and activity tables are consistent and that they are applied	Amend a range of provisions across the plan as to better support camping as an activity.

				consistently against the purpose and objectives of these zones.	
New Zealand Motor Caravan Association (S490)	S490.006	VISITOR ACCOMMODATION	Amend	This distinction between camping and camping grounds does not however entirely resolve the ambiguity between camping as an activity and camping grounds as a land use. Both definitions offered above allow for a requirement to pay to camp. The Camping Grounds Regulations rely on the payment of a fee, while the definition of visitor accommodation relies on the payment of a tariff. However, while recreational activities can include some form of admission fee, this payment is not seen as being the reason the activity is provided. This distinction around the centrality of payments is perhaps relevant to the acceptability (and hence the consent status) of camping activities on public open space.	Consider including camping activities within the definition of Visitor Accommodation
New Zealand Motor Caravan Association (S490)	S490.007	Permitted Activities	Amend	Campgrounds are not provided for specifically in any zones of the district plan, except for the Natural Open Space Zone that has provision for temporary campgrounds as a	Provide for campgrounds as a Permitted Activity in the Rural Lifestyle Zone.

				permitted activity and Open Space Zone which provides for camping grounds and accessory buildings ancillary to the camping ground as a permitted activity. However, we note that campgrounds can easily meet the objectives, policies and intention of many of these zones.	
New Zealand Motor Caravan Association (S490)	S490.008	NOSZ - Natural Open Space Zone Rules	Amend	The activity is consistent with the purpose, objectives and policies of the zone.	Provide for campgrounds as a Permitted Activity in the Natural Open Space Zone.
New Zealand Motor Caravan Association (S490)	S490.009	OSZ - Open Space Zone Rules	Amend	The activity is consistent with the purpose, objectives and policies of the zone	Provide for campgrounds and camping as a Permitted Activity.
New Zealand Motor Caravan Association (S490)	S490.010	SARZ - Sport and Active Recreation Zone Rules	Amend	The activity is consistent with the purpose, objectives and policies of the zone.	Provide for campgrounds and camping as a Permitted Activity.
New Zealand Motor Caravan	S490.011	Commercial Zone Rules	Amend	The activity is consistent with the purpose, objectives and policies of the zone.	Provide for campgrounds and camping as a Permitted Activity.

Association (S490)					
New Zealand Motor Caravan Association (S490)	S490.012	Mixed Use Zone Rules	Amend	The activity is consistent with the purpose, objectives and policies of the zone.	Provide for campgrounds and camping as a Permitted Activity.
New Zealand Motor Caravan Association (S490)	S490.013	Light Industrial Zone Rules	Amend	The activity is consistent with the purpose, objectives and policies of the zone.	Provide for campgrounds and camping as a Restricted Discretionary Activity.
New Zealand Motor Caravan Association (S490)	S490.014	Large Lot Residential Zone Rules	Amend	The activity is consistent with the purpose, objectives and policies of the zone.	Provide for campgrounds and camping as a Permitted Activity.
New Zealand Motor Caravan Association (S490)	S490.015	General Rural Zone - Rules	Amend	The activity is consistent with the purpose, objectives and policies of the zone.	Provide for campgrounds and camping as a Permitted Activity.
New Zealand Motor Caravan Association (S490)	S490.016	Permitted Activities	Amend	The activity is consistent with the purpose, objectives and policies of the zone.	Provide for campgrounds and camping as a Permitted Activity.

Nicholas Johnston (S14)	S14.001	DOC - 004	Oppose	You have the property with an SNA and effectively taken 95% of my land - I totally oppose it as it is theft by government you have 85% of the bush on the coast locked up with DoC already, which you took years ago!! Get off my land!!	Delete SNA DOC -004
Nicholas Johnston (S14)	S14.002	DOC - 004	Oppose	Its my land and to gain resource consent to remove and use my own trees be it exotic or indigenous from my own land is unaffordable and will limit what i can and can't do on my own property. I want the government to take into account my existing land use rights, building sites, deer traps, logging tracks, landing pads for my sustainable forestry permit and also a 50 + year old pine plantation which you have put all under the SNA (DOC 004). This wording (DOC 004) is incorrect. These areas need to be excluded from the SNA area and report as they are pre existing and needs to be documented accordingly.	Review the identification of DOC - 004 as an SNA. I want it reassessed and dissolved off the bottom half of my property and to be compensated for the rest.
Nicholas Johnston (S14)	S14.003	Mineral Extraction Zone	Oppose	You destroyed the whole hill side of Mount Buckley for the kiwi quarry which was in an SNA and then the	Reinstate the land and forest you destroyed at Kiwi Quarry.

				council government excluded it from the SNA area due to existing land use rights. You were meant to protect this area as a special corridor but you didn't you destroyed the whole ecosystem and now its been closed due to unsafe issues (which they knew of before they destroyed it. undercutting of the river and road.	
Nicholas Johnston (S14)	S14.004	Overview	Oppose	I'm contacting you in regards to SNA proposed boundaries and already imposed properties with an SNA, I'm Just wondering why there are two different types of assessing SNA areas 1. privately owned land and 2. government, doc or council owned. Seems to be working in favour for the government claiming more land and not paying a cent.	Clarify why public land is not identified as an SNA.
Nicholas Johnston (S14)	S14.007	Ecosystems and Indigenous Biodiversity	Oppose	You are giving two or three different status on properties owned by iwi, government/council/doc and private non maori land owners and this is discrimination and are being racist.	Treat all land tenures the same with regards to ecosystems and biodiversity. Iwi, government, Council and DOC land should all be treated the same.
Nicholas Johnston (S14)	S14.008	Ecosystems and Indigenous Biodiversity	Oppose	Protect the land you own already and stop imposing restrictions on the land you don't own.	Remove restrictions on private land for indigenous biodiversity.

Nicholas Johnston (S14)	S14.009	DOC - 004	Oppose	SNA identification has decreased the value of the property. If you want to control it, then buy it yourself.	Exclude half of my property from the SNA due to existing land use rights, so i can subdivide some of my property so it will be worth something in the future.
Nicholas Johnston (S14)	S14.010	Ecosystems and Indigenous Biodiversity	Oppose	I submitted against this last time and nothing was done. The previous owner also opposed the areas in question and also wasn't heard just imposed and walked over.	Delete provisions in relation to ecosystems and biodiversity.
Nick Pupich Sandy Jefferies (S546)	S546.001	Rezoning Requests	Oppose	I oppose the fact that the designation is arbitrary and does not relate to a technical assessment of Land Use Capability,	Remove the highly productive land precinct from the property at (Lot 2 DP 2743) in the Grey Valley, at 729 Atarau Road,
Nick Pupich Sandy Jefferies (S546)	S546.002	SUB - S1	Oppose	I object to a 10 hectare subdivision limit on my land given the conditions. I consider this is not consistent with the existing pattern of land use in the area.	Remove the subdivision restrictions over the Highly Productive Land precinct.
Nick Pupich Sandy Jefferies (S546)	S546.003	SUB - R6	Oppose	I oppose the fact that the designation is arbitrary and does not relate to a technical assessment of Land Use Capability,	Remove the provisions in relation to highly productive land
Nick Pupich Sandy Jefferies (S546)	S546.004	SUB - R8	Oppose	I oppose the fact that the designation is arbitrary and does not relate to a technical assessment of Land Use Capability,	Remove the provisions in relation to highly productive land
Nick Pupich Sandy	S546.005	RURZ - O1	Oppose	I oppose objectives, policies and rules seeking avoidance of	Remove reference to highly productive land

Jefferies (S546)				fragmentation of the land and lack of ability to have adequate input.	
Nick Pupich Sandy Jefferies (S546)	S546.006	GRUZ - PREC5 - P5	Oppose	I oppose objectives, policies and rules seeking avoidance of fragmentation of the land and lack of ability to have adequate input.	Remove reference to highly productive land
Nick Pupich Sandy Jefferies (S546)	S546.007	GRUZ - R3	Oppose	I oppose the fact that the designation is arbitrary and does not relate to a technical assessment of Land Use Capability,	Delete provision around highly productive land
Nick Pupich Sandy Jefferies (S546)	S546.008	Natural Hazards	Support	The mapping is arbitrary with highly inaccurate information. I am concerned about the insurance implications and additional cost.	Remove the flood plain overlay from Lot 3 DP 2743) in the Grey Valley, at Atarau
Nick Pupich Sandy Jefferies (S546)	S546.009	SUB - R23	Oppose	The mapping is arbitrary with highly inaccurate information. I am concerned about the insurance implications and additional cost.	Delete the reference to the flood plain overlay in the rule
Nick Pupich Sandy Jefferies (S546)	S546.010	EW - R2	Amend	While we understand the need for rules we do not understand why the existing rules have not just been reinstated.	Replace the rules with those developed in the operative Grey District Plan with regard to National Grid matters
Nick Pupich Sandy Jefferies (S546)	S546.011	ENG - R7	Amend	While we understand the need for rules we do not understand why the existing rules have not just been reinstated.	Replace the rules with those developed in the operative Grey District Plan with regard to National Grid matters

Nick Pupich Sandy Jefferies (S546)	S546.012	SUB - R8	Oppose	While we understand the need for rules we do not understand why the existing rules have not just been reinstated.	Replace the rules with those developed in the operative Grey District Plan with regard to National Grid matters
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<p>Nicola Hall (S404)</p>	<p>S404.001</p>	<p>Sites and Ares of Significance to Māori</p>	<p>Oppose</p>	<p>My husband and I own two small residential zoned titles of land in Central Greymouth which were acquired from Mawhera Incorporation Ltd (Mawhera), which only settled in late May 2022. We do not believe the site is of such significance to Maori, given that they already owned it and made a conscious decision to sell it to us. Mawhera actually went to the trouble of locating and contacting us, as neighbouring property owners on two occasions, asking if we wanted to purchase the two titles from them. The land needed to be put before the Maori Land Court to transfer it from Maori Land to General Land, so as it could be disposed of by Mawhera. This process took over 12 months. If the land truly is of Significance to Maori, why has the Maori Land Court recently passed an order determining the land status of many properties within Central Greymouth to be General, as opposed to Maori Land.</p>	<p>Delete SASM from for all properties that have been willingly sold by the Mawhera Incorporation, and directly or indirectly associated entities, within the last five years. This provision should apply especially to land that the Mawhera Incorporation, and directly or indirectly associated entities, have had moved from the Maori Land Register to the General Land Register.</p>
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Nicola Main (S131)	S131.001	Sites and Areas of Significance to Māori	Amend	The areas pin pointed by Maori as Significance to them is all hear-say. There is a longer and more consistent use and occupation of this area by European settlers. Who also have written and photographic evidence. The sections within the Okuru Village have been developed. There was no evidence unearthed during this time of Maori occupation.	Remove Okuru area from Sites and Areas of Significance to Maori (SASM196, SASM197, SASM198)
Nikau Farms Limited (S499)	S499.001	Rezoning Requests	Amend	The allotment is pastoral farmland and is proposed to be partially zoned General Rural and partially Settlement Rural Residential Precinct. The submitter has lodged a resource consent which is significantly progressed with Buller District Council (RC210073), which seeks consent to subdivide the land into 13 lots which would range from 2,035m ² to 2,670m ² . [refer submission for map]	Rezone 51ha of land along the Karamea Highway at Little Wanagnui Karamea (legally described as Lots 1-3 DP 409294 Lot 2 DP 407416 Lot 2 DP 547019 Sec 32 Pt Secs 7-8 Blk III Pt Secs 14-16 Blk II Kongahu Sd) as Settlement Zone. .
Noeline Pullan (S424)	S424.001	Rezoning Requests	Oppose	Re Revell St Medium Density Zone. Whilst not against med density housing in general - The location of this zone seems to be focused more on an economic win for people in	Rezone Medium Density Residential Zone on Revell St

				<p>power rather than the residents and future owners on those properties. Why would we allow med density 4 story on the beach front when currently the Hokitika and Regional Council are at a standstill over cost and design of the coastal erosion wall. Allowing up to 4 storey build would have severe and negative impact on landowners currently on the eastside of Revell Street- Blocking view creating shading. Would decline land and house values on the eastside of Revell street</p>	
<p>Northern Buller Communities Society Incorporated (S142)</p>	S142.001	Historic Heritage	Not Stated	<p>The TTPP map and aerial photo below identify the Heritage 2 listed former Mines Survey Office owned by the Society. Zoned "Settlement" we found it difficult to determine which precinct has been allowed to the site. We submit the site boundary is too far north and only appears to encompass half of the listed building itself. The entire site is subject to the Coastal Environment and Land Instability overlays and half the site is subject to the Coastal Hazard Severe overlay</p>	<p>Correctly locate the Granity Mines Survey Office heritage item on the maps - the current map wrongly sites the item.</p>

Northern Buller Communities Society Incorporated (S142)	S142.002	HH - P5	Support	In favour of principals	None stated
Northern Buller Communities Society Incorporated (S142)	S142.003	HH - P7	Support	In favour of principals	None stated
Northern Buller Communities Society Incorporated (S142)	S142.004	HH - P8	Support	In favour of principals	None stated
Northern Buller Communities Society Incorporated (S142)	S142.005	NHP10	Support	We understand and accept the objective and policies of the coastal severe overlays proposed	None stated
Northern Buller Communities	S142.006	NHR1	Support	This rule enables us to reconstruct or replace our buildings within the timeframes provided and we	In favour

Society Incorporated (S142)				consider both of them lawfully established	
Northern Buller Communities Society Incorporated (S142)	S142.007	Natural Hazards	Oppose	We consider the current boundaries of this overlay appear arbitrary and unnecessarily broad throughout the townships of Granity, Ngakaway and Hector and in many cases do not meet the objectives and policies relating to the purposes of the overlay. For the buildings above, we find it difficult to understand how the any issue of land instability as described below could possibly affect them. Even taking a precautionary approach, there is simply no risk from slope instability, landslide, debris flow and rockfall to our buildings or indeed many other located in the current overlay.	Review the land instability overlay for the Granity, Ngakawau and Hector areas.
Northern Buller Communities Society Incorporated (S142)	S142.008	Natural Hazards	Oppose	Oppose the land instability overlay being applied to the former mines survey office, and the lyric theatre in Granity.	Remove the land instability overlay on the former mines survey office and the Lyric Theatre in Granity.

Nyoli Waghorn-Rogatski (S301)	S301.001	Sites and Areas of Significance to Māori Rules	Amend	Concerned that rules are not clear with the plan.	SASM 36. Would like more information as how the SASM will affect my enjoyment at the property both now and in the future.
O'Connor Crossroads Limited (S496)	S496.001	Rezoning Requests	Amend	To create sufficient flood free residential land options to facilitate a managed retreat for homeowners	Rezone the following parcels from General Rural Zone to Settlement Zone - Rural Residential Precinct, being:Section 26 Blk VII Kawatiri Survey District, Section 30 Blk VII Kawatiri Survey District, and Pt Section 27 Blk VII Kawatiri Survey District
O'Connor Crossroads Limited (S496)	S496.002	Rezoning Requests	Amend	To create sufficient flood free residential land options to facilitate a managed retreat for homeowners	Rezone the following parcels from General Rural Zone to Future Urban Zone, being: Sec 1 SO 9139 Secs 1-2 SO 14816 Secs 3-4 23 Pt Sec 25 Blk VII Kawatiri SD
O'Connor Crossroads Limited (S496)	S496.003	Whole plan	Amend	To create sufficient flood free residential land options to facilitate a managed retreat for homeowners	Any other consequential amendments to give effect to the rezoning request
Owen Gould (S29)	S29.001	Open Space Zone	Neutral	My Submission relates to the Boat Launching Ramp (ramp), Gibson Quay, Hokitika. I am unaware if this facility sits on any Community Asset Register.We have recently commenced a new build adjacent from the ramp, where we now reside. Over the past five years we have witnessed the strong and keen use of the ramp by a mixed and	That TTPP Plan acknowledge Hokitika Boat Ramp as a Community Asset.The Boat Ramp remain in its current location and be brought up to standard and maintained.Funding be made available for future maintenance and upkeep.

				<p>varied number of users: being Boat Owners (Jet, Estuarian Small Craft, Canoeists, Jet Skiers and Offshore Craft). However, its uses extend much further. Many would be delighted and surprised by the strong number who use the ramp as an easy and safe point of access to the Hokitika River. The ramp not only needs to be recognized as a Community Asset, but as an asset that requires continued maintenance and upgrades when required. We are all fortunate to already have this facility and encourage the TTPP to Support its continued use, location and provide continued funding for its upkeep and upgrades.</p>	
Pamela Murphy (S257)	S257.001	Sites and Ares of Significance to Māori	Amend	<p>There is no pounamu in Blackball yet listed as such. In the future this would be detrimental to any mining etc. being done in these areas and if so then would have to be agreed to by iwi.</p>	Amend the Pounamu management area to exclude Blackball.
Papahaua Resources	S500.001	Description of the Districts	Support	<p>PRL strongly support all provisions that enable mineral extraction across the Region</p>	Retain recognition of the history of mining on the Coast in the introductory section

Limited (S500)					
Papahaua Resources Limited (S500)	S500.002	FUNCTIONAL NEED	Support		Retain as notified
Papahaua Resources Limited (S500)	S500.003	OPERATIONAL NEED	Support		Retain as notified
Papahaua Resources Limited (S500)	S500.004	Mineral Extraction	Support	PRL strongly support all provisions that enable mineral extraction across the Region	Retain as notified
Papahaua Resources Limited (S500)	S500.005	Connections and Resilience	Support	PRL strongly support all provisions that enable mineral extraction across the Region	Retain as notified
Papahaua Resources Limited (S500)	S500.006	Buller Coalfield Zone	Support	PRL strongly support all provisions that enable mineral extraction across the Region	Retain Buller Coalfield Zone and associated provisions
Papahaua Resources Limited (S500)	S500.007	Mineral Extraction Zone	Support	PRL strongly support all provisions that enable mineral extraction across the Region	Retain Mineral Extraction Zone and associated provisions

Papahaua Resources Limited (S500)	S500.008	Open Space and Recreation Zones	Support	PRL strongly support all provisions that enable mineral extraction across the Region	retain the enablement of mineral extraction in the open space zones
Papahaua Resources Limited (S500)	S500.009	Open Space Zone	Support	PRL strongly support all provisions that enable mineral extraction across the Region	retain the enablement of mineral extraction in the open space zones
Papahaua Resources Limited (S500)	S500.010	Rural Zones Objectives	Support	PRL strongly support all provisions that enable mineral extraction across the Region	retain the enablement of mineral extraction in the rural zones
Papahaua Resources Limited (S500)	S500.011	GRUZ - R12	Support	PRL strongly support all provisions that enable mineral extraction across the Region	Retain as notified
Papahaua Resources Limited (S500)	S500.012	General Rural Zone - Rules	Support	PRL strongly support all provisions that enable mineral extraction across the Region	Retain enabling provisions for mineral extraction
Papahaua Resources Limited (S500)	S500.013	Rules	Support	PRL strongly support all provisions that enable mineral extraction across the Region	Retain enabling approach to mineral extraction
Papahaua Resources	S500.014	MINZ - R3	Support		Retain the provisions for 30 heavy vehicle movements per day as a Permitted Activity

Limited (S500)					
Papahaua Resources Limited (S500)	S500.015	MINERAL EXTRACTION	Amend		Include ancillary activities within the definition
Papahaua Resources Limited (S500)	S500.016	MINERAL PROSPECTING	Amend		Include ancillary activities within the definition
Papahaua Resources Limited (S500)	S500.017	Connections and Resilience Strategic Objectives	Support		Amend to include the critical role that transport infrastructure plays on the West Coast with regard to connection and resilience
Papahaua Resources Limited (S500)	S500.018	Hazardous Substances	Support		Provide specific recognition of hazardous substance facilities associated with mining
Papahaua Resources Limited (S500)	S500.019	Transport	Support		Seek recognition of the importance of efficient and effective use and operation of the transport network;
Papahaua Resources Limited (S500)	S500.020	Transport	Amend		remove from the rules any assessment of amenity effects caused by use of the transport network

Papahaua Resources Limited (S500)	S500.021	Natural Environment Values	Amend		seek recognition within all overlay chapters that mineral extraction has a functional and operational need to locate where the resource is, and that this functional and operational need be given due consideration in resource consent applications within the specific overlay;
Papahaua Resources Limited (S500)	S500.022	HCV - Historical and Cultural Values	Amend		seek recognition within all overlay chapters that mineral extraction has a functional and operational need to locate where the resource is, and that this functional and operational need be given due consideration in resource consent applications within the specific overlay;
Papahaua Resources Limited (S500)	S500.023	Sites and Areas of Significance to Māori	Amend		seek recognition within all overlay chapters that mineral extraction has a functional and operational need to locate where the resource is, and that this functional and operational need be given due consideration in resource consent applications within the specific overlay;
Papahaua Resources Limited (S500)	S500.024	Natural Environment Values	Amend		seek that directive overlay provisions seeking to "avoid, protect, prevent" or "minimise, restrict and preserve" should be limited to situations where they are warranted (i.e. for significant adverse effects, or in environments meeting significance criteria (such as SASM or Significant Natural Areas)) because they can be problematic for passing the gateway test;
Papahaua Resources Limited (S500)	S500.025	HCV - Historical and Cultural Values	Amend		seek that directive overlay provisions seeking to "avoid, protect, prevent" or "minimise, restrict and

Limited (S500)					preserve" should be limited to situations where they are warranted (i.e. for significant adverse effects, or in environments meeting significance criteria (such as SASM or Significant Natural Areas)) because they can be problematic for passing the gateway test;
Papahaua Resources Limited (S500)	S500.026	Sites and Areas of Significance to Māori	Amend		seek that directive overlay provisions seeking to "avoid, protect, prevent" or "minimise, restrict and preserve" should be limited to situations where they are warranted (i.e. for significant adverse effects, or in environments meeting significance criteria (such as SASM or Significant Natural Areas)) because they can be problematic for passing the gateway test;
Papahaua Resources Limited (S500)	S500.027	HCV - Historical and Cultural Values	Amend		overlay chapters contain a restricted discretionary rule for mining, with discretion restricted to effects on the specific overlay or overlay values;
Papahaua Resources Limited (S500)	S500.028	Sites and Areas of Significance to Māori	Amend		overlay chapters contain a restricted discretionary rule for mining, with discretion restricted to effects on the specific overlay or overlay values;
Papahaua Resources Limited (S500)	S500.029	Natural Environment Values	Amend		seek that overlay chapters contain a restricted discretionary rule for mining, with discretion restricted to effects on the specific overlay or overlay values;
Papahaua Resources	S500.030	Subdivision	Amend		include a requirement to avoid the establishment of sensitive activities, and associated reverse sensitivity

Limited (S500)					effects, in proximity to mineral extraction activities and known mineral resources;
Papahaua Resources Limited (S500)	S500.031	Rural Zones	Amend		include a requirement to avoid the establishment of sensitive activities, and associated reverse sensitivity effects, in proximity to mineral extraction activities and known mineral resources;
Papahaua Resources Limited (S500)	S500.032	EarthworksRules	Amend		clarification that, as standalone activities in the rural, open space and mineral extraction zones, additional earthworks rules do not apply to mineral extraction;
Papahaua Resources Limited (S500)	S500.033	Permitted Activities	Amend		amend so that appropriate Lux limits are applied in the Mineral Extraction, Open Space and Rural zones
Papahaua Resources Limited (S500)	S500.034	Permitted Activities	Support		that the noise provisions are amended so that the weekend/public holiday hours in the General Rural Zone and Open Space Zone are the same as the weekday hours, being 7:00am to 10:00pm
Paparoa Track Services Ltd, Craig and Sue Findlay, Tim Findlay, Punakaiki Beach Camp Ltd (S605)	S605.001	Whole plan	Neutral	To enable alternative relief which may give effect to the matters in the submission.	Alternative, consequential, or necessary additional relief to give effect to the matters raised generally in this submission.

Paparoa Track Services Ltd, Craig and Sue Findlay, Tim Findlay, Punakaiki Beach Camp Ltd (S605)	S605.002	CAMPING GROUNDS	Amend	Needs to include cabins and motel type accommodation which are often a vital part	Amend the definition of Camping Grounds as follows: has the same meaning as the Camping Grounds Regulations 1985 (as set out below) means any area of land used, or designed or intended to be used, ..., or other premises and equipment , and includes the use of permanent buildings for sleeping in such as cabins and motel accomodation ancillary to the camping ground.
Paparoa Track Services Ltd, Craig and Sue Findlay, Tim Findlay, Punakaiki Beach Camp Ltd (S605)	S605.003	TRM - O1	Support	Recognises the significance of tourism to the West Coast Economy	Retain as notified.
Paparoa Track Services Ltd, Craig and Sue Findlay, Tim Findlay, Punakaiki Beach Camp Ltd (S605)	S605.004	NHP10	Amend	Provide for people's individual economic and social wellbeing by allowing development where the risk is sufficiently mitigated.	Amend NH - P10 as follows: Avoid development of sensitive activities within the Coastal Severe Hazard and Flood Severe Hazard overlays unless it can be demonstrated that: a. The activity has an operational and functional need to locate within the hazard area; and or b. That the activity incorporates mitigation of risk to life, property and the environment, and there is significant public or environmental benefit in doing so.

Paparoa Track Services Ltd, Craig and Sue Findlay, Tim Findlay, Punakaiki Beach Camp Ltd (S605)	S605.005	NHP12	Support	Allowing for the development within the coastal alert area as long as mitigation measures are in place	Retain as notified.
Paparoa Track Services Ltd, Craig and Sue Findlay, Tim Findlay, Punakaiki Beach Camp Ltd (S605)	S605.006	Permitted Activities	Amend	Within the Coastal Hazard Alert overlay allow for buildings which are relocatable	New rule as follows: Permitted activity NH - RX New Relocatable Buildings Activity Status Permitted Where: 1. Buildings are designed to be relocatable or re-levelled in the event of sea level rise or inundation. Advice note: Compliance with Rule NH - RX will be demonstrated through a statement from the building designer or architect confirming that the building has been designed to be relocatable or re-levelled.
Paparoa Track Services Ltd, Craig and Sue Findlay, Tim Findlay, Punakaiki Beach Camp Ltd (S605)	S605.007	NHR33	Oppose	Restricts new buildings for sensitive activities in the land stability overlay.	Delete this rule in relation to Punakaiki Village.

Paparoa Track Services Ltd, Craig and Sue Findlay, Tim Findlay, Punakaiki Beach Camp Ltd (S605)	S605.008	NHR34	Oppose	States that new buildings for sensitive activities in the land stability overlay are non-complying.	Delete this rule in relation to Punakaiki Village.
Paparoa Track Services Ltd, Craig and Sue Findlay, Tim Findlay, Punakaiki Beach Camp Ltd (S605)	S605.009	NHR38	Support	Allows for a building to be reconstructed should it be destroyed due to fire, natural disaster or Act of God	Retain as notified.
Paparoa Track Services Ltd, Craig and Sue Findlay, Tim Findlay, Punakaiki Beach Camp Ltd (S605)	S605.010	NHR40	Amend	Allowing for alternative mitigation	Amend NH- R40 as follows: Activity Status Permitted Where: 1. There is no increase to the net floor area used for any sensitive activity; and Any addition or alteration has been designed to be relocatable or able to be relevelled; or 2. Where any increase in net floor area meets a minimum finished floor level of 300mm above a 1% annual exceedance probability (AEP) event.

<p>Paparoa Track Services Ltd, Craig and Sue Findlay, Tim Findlay, Punakaiki Beach Camp Ltd (S605)</p>	S605.011	NHR41	Oppose	The submitters oppose this rule, and seek a permitted activity status	Delete NH - R41
<p>Paparoa Track Services Ltd, Craig and Sue Findlay, Tim Findlay, Punakaiki Beach Camp Ltd (S605)</p>	S605.012	NHR44	Amend	Activity status will result in the housing stock stagnating, when new development could increase the township's resilience	Amend the activity status of NH - R 44 as follows: NH - R44 Coastal Severe Overlay: New Buildings for Sensitive Activities and Additions and Alterations of Buildings that increase the net floor area for Sensitive Activities Activity Status Non-complying Discretionary Where: 1. New Buildings are not designed to be relocatable or re-levelled; or 2. New Buildings are not designed to meet a finished floor level of 300mm above a 1% annual exceedance probability (AEP) event. These are located in the Coastal Severe Overlay
<p>Paparoa Track Services Ltd, Craig and Sue Findlay, Tim Findlay, Punakaiki</p>	S605.013	OSRZ - P1	Oppose	Including requirements to adhere to these plans is considered to be an unnecessary duplication of regulation	Delete OSRZ - P1

Beach Camp Ltd (S605)					
Paparoa Track Services Ltd, Craig and Sue Findlay, Tim Findlay, Punakaiki Beach Camp Ltd (S605)	S605.014	OSRZ - P9	Support in part	To ensure that the future redevelopment and upgrading of Punakaiki Beach Cam	Amend OSRZ as follows: Provide for the range of purposes where compatible with the open space values including: a. The ongoing operation and appropriate management of cemeteries; b. Camping and other visitor accommodation opportunities at rivers, lakes and coastal areas where this is compatible with the values of the open space; c. Gravel and shingle extraction for roading networks and other local purposes; d. Quarries for rock; e. Pastoral farming including grazing as a management tool; f. Mineral extraction of resources where these are limited in their location; and g. Water supply and drainage networks where this supports local community needs.
Paparoa Track Services Ltd, Craig and Sue Findlay, Tim Findlay, Punakaiki Beach Camp Ltd (S605)	S605.015	OSRZ - P11	Support in part	refer to the definition of camping grounds	Amend OSRZ P11 as follows: The OSZ - Open Space Zone primarily provides for passive and active recreation activities, community facilities, camping grounds campgrounds and cemeteries and limited associated facilities and structures.
Paparoa Track Services Ltd,	S605.016	OSZ - R1	Support in part	Often require accessory ancillary buildings and cabins to be built to help service camping grounds	Activity Status Permitted Where: 1. The maximum building height above ground level is 7m; 2. The maximum gross floor area is 100m2 per building ; ...

Craig and Sue Findlay, Tim Findlay, Punakaiki Beach Camp Ltd (S605)					
Paparoa Track Services Ltd, Craig and Sue Findlay, Tim Findlay, Punakaiki Beach Camp Ltd (S605)	S605.017	OSZ - R3	Oppose	Not all Open Space zoned land has a management plan, and this is considered to be an unnecessary duplication of regulation.	Delete OSZ - R3.2 entirely
Paparoa Track Services Ltd, Craig and Sue Findlay, Tim Findlay, Punakaiki Beach Camp Ltd (S605)	S605.018	OSZ - R4	Oppose	Unnecessary duplication of regulation.	Delete OSZ - R4.2 entirely
Paparoa Track Services Ltd, Craig and	S605.019	OSZ - R5	Oppose	Unnecessary duplication of regulation.	Delete OSZ - R5.2 entirely

Sue Findlay, Tim Findlay, Punakaiki Beach Camp Ltd (S605)					
Paparoa Track Services Ltd, Craig and Sue Findlay, Tim Findlay, Punakaiki Beach Camp Ltd (S605)	S605.020	OSZ - R9	Oppose in part	Unnecessary duplication of regulation.	Delete OSZ R9.1 entirely
Paparoa Track Services Ltd, Craig and Sue Findlay, Tim Findlay, Punakaiki Beach Camp Ltd (S605)	S605.021	OSZ - R25	Oppose	The effects of commercial activities are less and not comparable to industrial activities	Amend OSZ - R25 as follows: Industrial Activities, Commercial Activities other than Retail Introduce a new rule as follows: OSZ - RXX Commercial activities other than Retail Activity Status Discretionary
Paparoa Track Services Ltd, Craig and Sue Findlay,	S605.022	RURZ - O1	Support	The submitters support this objective which enables a range of activities.	Retain as notified.

Tim Findlay, Punakaiki Beach Camp Ltd (S605)					
Paparoa Track Services Ltd, Craig and Sue Findlay, Tim Findlay, Punakaiki Beach Camp Ltd (S605)	S605.023	RURZ - P1	Support	Supports a range of activities in rural zones	Retain as notified.
Paparoa Track Services Ltd, Craig and Sue Findlay, Tim Findlay, Punakaiki Beach Camp Ltd (S605)	S605.024	RURZ - P6	Support	Recognises that activities have a relationship with the rural area	Retain as notified.
Paparoa Track Services Ltd, Craig and Sue Findlay, Tim Findlay,	S605.025	RURZ - P8	Support	This policy specifically seeks to provide for commercial activities within settlements.	Retain as notified.

Punakaiki Beach Camp Ltd (S605)					
Paparoa Track Services Ltd, Craig and Sue Findlay, Tim Findlay, Punakaiki Beach Camp Ltd (S605)	S605.026	RURZ - P9	Support	Recognises that rural areas form an important part of the visitor economy.	Retain as notified.
Paparoa Track Services Ltd, Craig and Sue Findlay, Tim Findlay, Punakaiki Beach Camp Ltd (S605)	S605.027	RURZ - P10	Support	Supports the development of appropriate tourism and visitor business such as the one owned by the submitter.	Retain as notified.
Paparoa Track Services Ltd, Craig and Sue Findlay, Tim Findlay, Punakaiki	S605.028	SETZ - PREC 4 - Rural Residential Precinct	Amend	Does not correspond to other natural hazards policies	Amend SETZ - PREC4 - P3 as follows: Subdivision, use and development within the SETZ - PREC3 - Coastal Settlement Precinct should: a.... c. Recognise and provide for access to mahinga kai and Sites and Areas of Significance to Māori for Poutini Ngāi Tahu; and d. Be located to avoid or designed to mitigate the significant risks of natural hazards.

Beach Camp Ltd (S605)					
Paparoa Track Services Ltd, Craig and Sue Findlay, Tim Findlay, Punakaiki Beach Camp Ltd (S605)	S605.029	SETZ - R2	Oppose in part	200m2 gross ground floor area within the coastal precinct is insufficient	Amend SETZ - R 2 as follows: Activity Status Permitted Where: ... 3. 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 250 200 m2 total for all buildings on the site.
Paparoa Track Services Ltd, Craig and Sue Findlay, Tim Findlay, Punakaiki Beach Camp Ltd (S605)	S605.030	SETZ - R3	Oppose	Onsufficient to provide for most residential activities which are anticipated	Delete SETZ - R3.2 entirely.
Paparoa Track Services Ltd, Craig and Sue Findlay, Tim Findlay, Punakaiki	S605.031	SETZ - R10	Oppose	The requirement to meet the homestay definition in the Buller District is unnecessary	Delete SETZ - R10.7 entirely.

Beach Camp Ltd (S605)					
Paparoa Track Services Ltd, Craig and Sue Findlay, Tim Findlay, Punakaiki Beach Camp Ltd (S605)	S605.032	SETZ - R21	Support	Support restricted discretionary activity status for visitor accommodation	Retain as notified.
Paparoa Track Services Ltd, Craig and Sue Findlay, Tim Findlay, Punakaiki Beach Camp Ltd (S605)	S605.033	SVZ - O1	Support	To provide for community and visitor needs.	Retain as notified.
Paparoa Track Services Ltd, Craig and Sue Findlay, Tim Findlay, Punakaiki	S605.034	SVZ - P1	Support in part	Seeks to include recognition of the existing mixed character of the commercial and residential uses of the Punakaiki Township	amend as follows d. Recognises the existing mixed character of commercial and residential uses of Punakaiki Township

Beach Camp Ltd (S605)					
Paparoa Track Services Ltd, Craig and Sue Findlay, Tim Findlay, Punakaiki Beach Camp Ltd (S605)	S605.035	SVZ - P3	Support	Recognises the significance of the three townships to the wider visitor economy of the West Coast/Te Tai o Poutini	Retain as notified.
Paparoa Track Services Ltd, Craig and Sue Findlay, Tim Findlay, Punakaiki Beach Camp Ltd (S605)	S605.036	SVZ - P4	Amend	To recognise that development is sympathetic to the existing built environment	Amend: ...scenic and built environments ...
Paparoa Track Services Ltd, Craig and Sue Findlay, Tim Findlay, Punakaiki	S605.037	SVZ - P6	Amend	Is not sympathetic to the existing built environment.	Amend to recognise develop is to be sympathetic to existing built environments as follows: f. Reflect the character of the existing built environment

Beach Camp Ltd (S605)					
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Paparoa Track Services Ltd, Craig and Sue Findlay, Tim Findlay, Punakaiki Beach Camp Ltd (S605)	S605.038	NHR33	Oppose in part	The submission point particularly relates to land instability overlay on Map 34. Considered to be insufficient to understand the application of various hazards to the Punakaiki Village.	Map 34 of the proposed Plan which covers natural hazards is considered to be insufficient to understand the application of various hazards to the Punakaiki Village. Specifically the land instability mapping does not align with the existing mapping and no new assessment is provided to support this change.
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Paparoa Track Services Ltd, Craig and Sue Findlay, Tim Findlay, Punakaiki Beach Camp Ltd (S605)	S605.039	NHP10	Oppose	should take an approach which provides for development which appropriate mitigation which may include buildings being relocatable or able to be re-piled to a higher level in future	Delete part b.
Patrick Cooper (S434)	S434.001	OSZ - Open Space Zone Rules	Amend	Coopers Drilling Services currently have a quarry operation North of Westport at Jones Creek (Mining permit MP60583). It currently supplied high demand and very high value aggerates including boulders (diorite and granite) for coastal protection. If access to these mining and quarrying areas of the Ranges are put off limits then this will deny the Buller District of a essential resource. It is essential that general rule for mineral extraction are included within the Paparoa Ranges including the Buller Coalfield zone.	Provide for mineral extraction within the rules for the Paparoa Ranges (Open Space Zone)
Patrick Cooper (S434)	S434.002	Buller Coalfield Zone Rules	Support	Coopers Drilling Services currently have a quarry operation North of Westport at Jones Creek (Mining permit MP60583). It currently	Retain the general rules for mineral extraction

				<p>supplied high demand and very high value aggerates including boulders (diorite and granite) for coastal protection. If access to these mining and quarrying areas of the Ranges are put off limits then this will deny the Buller District of a essential resource. It is essential that general rule for mineral extraction are included within the Papanoa Ranges including the Buller Coalfield zone.</p>	
<p>Patrick Cooper (S434)</p>	S434.003	General Rural Zone Rules	Support	<p>Coopers Drilling Services currently have a quarry operation North of Westport at Jones Creek (Mining permit MP60583). It currently supplied high demand and very high value aggerates including boulders (diorite and granite) for coastal protection. If access to these mining and quarrying areas of the Ranges are put off limits then this will deny the Buller District of a essential resource. It is essential that general rule for mineral extraction are included within the Papanoa Ranges</p>	Retain the general rules for mineral extraction
<p>Paula Jones (S590)</p>	S590.001	Whole plan	Support	<p>Recognising the importance of farming, quarrying and mining to the West Coast</p>	retain provisions relating to farming, quarrying and mining to the West Coast

Paula Jones (S590)	S590.002	Rural Zones	Support	Providing for mineral extraction in zones	retain provisions for mineral extractions in zones
Paula Jones (S590)	S590.003	Open Space and Recreation Zones	Support	Providing for mineral extraction in zones	retain provisions for mineral extractions in zones
Paula Jones (S590)	S590.004	Mineral Extraction Zone	Support		Retain
Paula Jones (S590)	S590.005	Rezoning Requests	Amend	Amend to Mineral Extraction Zone	Sections 2 SO 11712, Section 3 SO 11712, Lot 1 DP 315 and Part Lot 2 DP 315 be rezoned to Mineral Extraction Zone
Paul Avery (S512)	S512.001	Definitions	Oppose in part	We believe that this definition could inadvertently capture herd homes and wintering barns (where the primary production activity principally otherwise occurs in an outdoor environment). We believe this should be amended so as to be clear that the use of herd homes and wintering barns is not included within the definition of Intensive Indoor Primary Production.	Amend as follows: Means primary production activities that principally occur within buildings and involve growing fungi, or keeping or rearing livestock (excluding calf-rearing for a specified time period) or poultry. The use of herd homes and wintering barns where the primary production activity principally otherwise occurs in an outdoor environment is not included in this definition.
Paul Avery (S512)	S512.002	Definitions	Not Stated	We operate industrial activities from our property covered by SASM14. We believe that there needs to be a clear definition for “offensive industries” as it is listed in SASM – P11.	Develop a definition for “offensive industries”.

Paul Avery (S512)	S512.003	Definitions	Not Stated	We operate industrial activities from our property covered by SASM14. We believe that there needs to be a clear definition for “hazardous facilities” as it is listed in SASM – P11 and SASM – R17.	Develop a definition for “hazardous facilities”.
Paul Avery (S512)	S512.004	Natural Hazards Objectives	Not Stated	Similarly to NH – O4, the role that protective structures play in natural hazard mitigation needs to be recognised in the Natural Hazards Objectives.	Add a new objective: To ensure the role of hazard mitigation played by protective structures and works that minimise impacts of hazards including rock walls and stopbanks is recognised and protected.
Paul Avery (S512)	S512.005	NHP10	Oppose in part	The wording of this policy is too restrictive and precludes a landowner seeking other expert input or utilising solutions where the hazard could be substantially mitigated using technical solutions.	Include wording that allows technical solutions or differing expert opinion to support resource consent applications for development. The wording of NH – P11 is more appropriate for severe overlays than the current wording. Delete “and there is significant public or environmental benefit from doing so”.
Paul Avery (S512)	S512.006	NHP11	Support	We support this provision.	Retain as notified.
Paul Avery (S512)	S512.007	NHP12	Oppose in part	This policy is very restrictive.	Retain point b. Delete point g.
Paul Avery (S512)	S512.008	NHR1	Oppose in part	Two and five years is an insufficient length of time for reconstruction/replacement.	Amend rule so that there is a ten year period within which lawfully established buildings can be reconstructed/replaced in all overlays or delete time limit.
Paul Avery (S512)	S512.009	NHR8	Oppose in part	Point two in this rule is too restrictive.	Delete point 2.

Paul Avery (S512)	S512.010	NHR9	Oppose in part	The activity status when compliance is not achieved is too restrictive.	Amend status when compliance is not achieved to Discretionary.
Paul Avery (S512)	S512.011	NHR12	Support	We support this rule.	Retain as notified.
Paul Avery (S512)	S512.012	NHR13	Support	We support this rule.	Retain as notified.
Paul Avery (S512)	S512.013	NHR14	Oppose	Activity status is too restrictive.	Amend status to Discretionary.
Paul Avery (S512)	S512.014	NHR38	Oppose in part	Two and five years is an insufficient length of time for reconstruction/replacement and there is no activity status where compliance is not achieved.	Amend rule so that there is a ten year period within which lawfully established buildings can be reconstructed/replaced in all overlays or delete time limit and if compliance is not achieved, this should be a Discretionary Activity.
Paul Avery (S512)	S512.015	NHR39	Support	We support this rule.	Retain as notified.
Paul Avery (S512)	S512.016	NHR40	Oppose in part	Point two in this rule is too restrictive.	Delete point 2.
Paul Avery (S512)	S512.017	NHR41	Oppose in part	The activity status when compliance is not achieved within the Coastal Severe Overlay is too restrictive.	Amend status when compliance is not achieved to Discretionary for both Coastal Alert and Coastal Severe Overlays.
Paul Avery (S512)	S512.018	NHR42	Oppose in part	The activity status when compliance is not achieved within the Coastal Severe Overlay is too restrictive.	Amend status when compliance is not achieved to Discretionary for both Coastal Alert and Coastal Severe Overlays.
Paul Avery (S512)	S512.019	NHR43	Support	We support this rule.	Retain as notified.
Paul Avery (S512)	S512.020	NHR44	Oppose	Activity status is too restrictive.	Amend status to Discretionary.

Paul Avery (S512)	S512.021	SASM - P14	Oppose	I believe our properties at 81 Brougham st and 21A Domett street Westport have been wrongly/mistakenly categorised into SASM14	Delete properties from SASM14
Paul Avery (S512)	S512.022	SASM -R2	Oppose in part	Too restrictive.	Delete iii. a. and b.
Paul Avery (S512)	S512.023	SASM -R3	Support	We support the rule with SASM14 being excluded.	Retain as notified with SASM14 being excluded from point 2.
Paul Avery (S512)	S512.024	SASM -R6	Oppose	Too restrictive.	SASM14 should be excluded from Schedule Three referred to in 1.i. The rule is generally too restrictive.
Paul Avery (S512)	S512.025	SASM -R9	Oppose	Too restrictive.	Delete rule or include SASM14 on the list of sites.
Paul Avery (S512)	S512.026	SASM - R10	Oppose	Too restrictive.	Delete.
Paul Avery (S512)	S512.027	SASM - R11	Oppose	Too restrictive.	Delete.
Paul Avery (S512)	S512.028	SASM - R12	Oppose	Too restrictive.	Delete.
Paul Avery (S512)	S512.029	SASM - R13	Oppose	Too restrictive.	Delete.
Paul Avery (S512)	S512.030	SASM - R14	Oppose	Too restrictive.	Delete.
Paul Avery (S512)	S512.031	SASM - R15	Oppose	Too restrictive.	Delete.
Paul Avery (S512)	S512.032	SASM - R16	Oppose	Too restrictive.	Delete.

Paul Avery (S512)	S512.033	SASM - R17	Oppose	Too restrictive.	Delete.
Paul Avery (S512)	S512.034	ECO - P1	Support	We support that areas of significant indigenous vegetation and fauna habitat will be identified through the resource consent process until such time as district wide identification and mapping of significant natural areas is undertaken in an appropriate and consultative way and that a formal Plan Change occurs after that time.	Retain as notified.
Paul Avery (S512)	S512.035	ECO - P3	Support	We support this policy.	Retain as notified.
Paul Avery (S512)	S512.036	ECO - P4	Support	We support this policy.	Retain as notified.
Paul Avery (S512)	S512.037	ECO - P7	Oppose in part	We support that this policy provides for consideration of “the appropriateness of any biodiversity offsetting or compensation in accordance with Policy 9 to offset any residual adverse effects that remain after avoiding, remedying and mitigating measures have been applied.”	Retain as notified.
Paul Avery (S512)	S512.038	ECO - P9	Support	We support this policy.	Retain as notified.

Paul Avery (S512)	S512.039	ECO - R1	Oppose in part	We request that provision is made for low-level clearance for building sites within SNAs (including for future/not yet approved subdivisions). Providing for these types of living options can actually facilitate predator and pest management and control and is an important lifestyle option for the region.	Amend wording to provide for building sites.
Paul Avery (S512)	S512.040	ECO - R2	Oppose in part	We request that provision is made for low-level clearance for building sites within SNAs (including for future/not yet approved subdivisions). Providing for these types of living options can actually facilitate predator and pest management and control and is an important lifestyle option for the region.	Amend wording to provide for building sites.
Paul Avery (S512)	S512.041	ECO - R4/SUB - R7	Oppose in part		
Paul Avery (S512)	S512.042	ECO - R6/SUB - R9	Oppose in part		
Paul Avery (S512)	S512.043	ECO - R8/SUB - R15	Oppose in part		

Paul Avery (S512)	S512.044	ECO - R9/SUB - R27	Oppose		
Paul Avery (S512)	S512.045	SUB - P9	Oppose in part	Esplanade reserves and strips should not be required to be wider than 20m	Delete references to widths greater than 20m.
Paul Avery (S512)	S512.046	SUB - R5	Oppose in part	The activity status when compliance with point 6 (i.e. Coastal Severe Overlays etc) is appropriate. Where compliance is not achieved, status should be Discretionary.	Retain status when compliance with point 6 is not achieved to Discretionary.
Paul Avery (S512)	S512.047	SASM - R14	Oppose	We oppose SASM14 and the rules associated with it.	Delete SASM 14 or provide exclusions for it in associated rules.
Paul Avery (S512)	S512.048	SUB - R6	Oppose in part	There are parts of this rule that are too restrictive. For example, if only part of a parcel is located within overlays a specified in point 4, this should not automatically result in the entire parcel being considered inappropriate for subdivision.	Activity status where there is non-compliance with point should be Discretionary. There should be no escalation to NonComplying status.
Paul Avery (S512)	S512.049	SUB - R7/ECO - R4	Oppose in part	The provision heading is unclear given SNAs are yet to be mapped. Point 2 is not necessary and a SNA does not need to be within a single allotment. Point 3 should allow biodiversity offsetting or compensation etc. to be considered within this point.	Amend heading to read: Subdivision to create allotment(s) of Land Containing an Scheduled Area of Significant Indigenous Biodiversity. Delete point 2. Amend to: The subdivision will not result in buildings or access ways being located within the identified area of significant indigenous biodiversity or the need for clearance of significant indigenous vegetation to provide for future access to any site unless

					adverse effects can be addressed by alternative mitigation measures such as biodiversity offsetting and environmental compensation; and
Paul Avery (S512)	S512.050	SUB - R6	Oppose in part	There are parts of this rule that are too restrictive. For example, if only part of a parcel is located within overlays a specified in point 4, this should not automatically result in the entire parcel being considered inappropriate for subdivision.	Activity status where there is noncompliance with point should be Discretionary. There should be no escalation to NonComplying status.
Paul Avery (S512)	S512.051	SUB - R9/ECO - R6	Oppose in part	The provision is unclear given SNAs are yet to be mapped. Point 2 is not necessary and a SNA does not need to be within a single allotment. Point 3 should allow biodiversity offsetting or compensation etc. to be considered within this point.	Amend heading to read: Subdivision of Land to create allotment(s) Containing an Scheduled Area of Significant Indigenous Biodiversity not meeting Rule SUB – R7. Delete. Amend to: The subdivision will not result in buildings or access ways being located within any Significant Natural Area identified in Schedule Four unless adverse effects can be addressed by alternative mitigation measures such as biodiversity offsetting and environmental compensation; and
Paul Avery (S512)	S512.052	SUB - R13	Support	We support the provision.	Retain as notified.
Paul Avery (S512)	S512.053	SUB - R15/ECO - R8	Oppose in part	Points 1 and 2 should be deleted from this rule as the escalation to Non-Complying is inappropriate and too restrictive.	Delete points 1 and 2. Activity status where there is noncompliance should be deleted as there should be no escalation to Non-Complying status

Paul Avery (S512)	S512.054	SUB - R16	Oppose in part	Point 1 should be deleted from this rule as the escalation to Non-Complying is inappropriate and too restrictive.	Delete point 1. Activity status where there is noncompliance should be deleted as there should be no escalation to Non-Complying status.
Paul Avery (S512)	S512.055	SUB - R17	Support	We support the provision.	Retain as notified.
Paul Avery (S512)	S512.056	SUB - R18	Support	We support this provision.	Retain
Paul Avery (S512)	S512.057	SUB - R20	Support	We support this provision.	Retain
Paul Avery (S512)	S512.058	SUB - R21	Support	We support this rule but note the error that where activity status where compliance is not achieved status becomes Non- Complying	Amend to: Activity status where compliance not achieved: Non-complying N/A.
Paul Avery (S512)	S512.059	SUB - R23	Support	We support this provision.	Retain
Paul Avery (S512)	S512.060	SUB - R25	Oppose	The rule is too restrictive.	Delete
Paul Avery (S512)	S512.061	SUB - R27/ECO - R9	Oppose	The rule is too restrictive.	Delete
Paul Avery (S512)	S512.062	Coastal Environment	Oppose	This overlay is far too extensive. The extent inland that overlay covers is inappropriate and will unduly restrict development.	Amend overlay extent to exclude our properties.
Paul Avery (S512)	S512.063	CE - P5	Support	We support this provision.	Retain as notified.

Paul Avery (S512)	S512.064	CE - P6	Support	We support this provision.	Retain as notified.
Paul Avery (S512)	S512.065	CE - R1	Support	We support this provision.	Retain as notified.
Paul Avery (S512)	S512.066	CE - R4	Oppose in part	The maximum height limit of buildings and structures should be that specified for the particular zone. The gross ground floor area is too restrictive and should revert to zone rules.	Delete point 2. a. i. Delete point 2. a. iii.
Paul Avery (S512)	S512.067	CE - R12	Support	We support this rule.	Retain as notified.
Paul Avery (S512)	S512.068	CE - R19	Support	We support this rule.	Retain as notified.
Paul Avery (S512)	S512.069	NOISE - R3	Oppose in part	We believe that these acoustic insulation requirements should apply within 100m of our consented quarry to new buildings used for sensitive activities that built in the General Residential Zone at Alma Road if that proceeds to any extent.	Amend NOISE – R3 so that this rule includes that to include acoustic insulation requirements within 100m of our consented quarry for new buildings used for sensitive activities built at the proposed residential development at Alma Road.
Paul Avery (S512)	S512.070	NOISE - R5	Oppose	We are opposing this due to reverse sensitivity concerns regarding our quarry operations.	Amend to explicitly exclude consented quarrying operations and similar.
Paul Avery (S512)	S512.071	Residential Zones	Support	We support that the properties owned by our family on Orowaiti Road and Brougham Street (through	Retain as notified.

				freehold or leasehold titles) are zoned residential (i.e. Lot 3 DP 18892, Pt Section 213 Square 141, Lot 2 DP 692, Lot 10 DP 1086, Lot 11 DP 1086, Lot 12 DP 1086 and Pt Lot 13 DP 1086).	
Paul Avery (S512)	S512.072	General Residential Zone	Oppose in part	We oppose the entire enclave of General Residential Zoning at Alma Road. We believe this should be General Rural Zone or Rural Lifestyle Zone.	Amend General Residential Zoning in the Alma Road area to a lower density zone such as General Rural Zone or Rural Lifestyle Zone.
Paul Avery (S512)	S512.073	Settlement Zone	Support	We support that 95 Snodgrass Road is zoned Settlement Zone (i.e. Section 1 SO 14107 and Section 14 Town of Orowaiti).	Retain as notified.
Paul Avery (S512)	S512.074	GRUZ	Support	We support that the land we own at 107 Alma Road is zoned General Rural Zone (i.e. Lot 4 DP 15375, PT Lot 2 DP 7181, Section 1 SO 14701 and Section 2 SO 14701).	Retain as notified.
Paul Avery (S512)	S512.075	GRUZ	Support	We support that Lot 1 DP 17523 is zoned General Rural Zone (i.e. part of 103 Alma Road). Our quarry is important to our business and to the district. It would suffer from inevitable reverse sensitivity issues if adjacent land was zoned for	Retain as notified.

				urban/residential use. We support the proposed buffering areas to limit the likelihood of reverse sensitivity effects on our operation from surrounding land use and housing density changes.	
Paul Avery (S512)	S512.076	GRUZ	Support	We support that the land between our quarry and Pakihi Road is zoned General Rural Zone (i.e. Lot 2 DP 404550, Lot 2 DP 418652 and Pt Section 24 Blk VII Kawatiri SD). Our quarry is important to our business and to the district. It would suffer from inevitable reverse sensitivity issues if adjacent land was zoned for urban/residential use. We support the proposed buffering areas to limit the likelihood of reverse sensitivity effects on our operation from surrounding land use and housing density changes. We believe that there is a potential natural hazard risk in this area due to overland flow that requires evaluation.	Retain as notified
Paul Avery (S512)	S512.077	GRUZ	Support	We support that the land that we own between Bulls Road and Bradshaws Road north of State Highway 67A is zoned General Rural	Retain as notified.

				Zone (i.e. Sections 26 and 27 Blk II Steeples SD).	
Paul Avery (S512)	S512.078	GRUZ	Oppose	We oppose that the land we own between Bulls Road and Bradshaws Road south of State Highway 67A is zoned General Rural Zone (i.e. Section 1 SO 14694, Part Section 2 Blk II Steeples SD, Section 3 Blk II Steeples SD, Section 4 Blk II Steeples SD, Section 5 Blk II Steeples SD, Section 42 Blk II Steeples SD and Section 71 Blk II Steeples SD). We submit that this should be zoned Rural Residential Precinct.	Amend to Rural Residential Precinct.
Paul Avery (S512)	S512.079	Commercial Zone	Support	We support that Lot 4 DP 15375 and Lot 1 DP 15375 are zoned Commercial Zone (i.e. part of 103 Alma Road and 20 Gillows Dam Road). Our quarry is important to our business and to the district. It would suffer from inevitable reverse sensitivity issues if adjacent land was zoned for urban/residential use. We support the proposed buffering areas to limit the likelihood of reverse sensitivity effects on our operation from surrounding land use and housing density changes.	Retain as notified.

Paul Avery (S512)	S512.080	Sites and Areas of Significance to Māori Rules	Oppose	We oppose SASM14 and the rules associated with it.	Delete SASM14 or provide exclusions for it in associated rules.
Paul Avery (S512)	S512.081	Westport Hazard Overlay	Oppose in part	This overlay is inappropriate. Associated provisions take an excessively restrictive approach to hazard management and mitigation.	Amend overlay and amend associated objectives, policies and rules to be more enabling.
Paul Avery (S512)	S512.082	Coastal Severe and Coastal Alert Overlay	Oppose in part	This overlay is too extensive.	Amend overlay extent to exclude our properties.
Paul Avery (S512)	S512.083	Coastal Environment	Oppose in part	This overlay is far too extensive. The extent inland that the overlay covers is inappropriate and will unduly restrict development.	Amend and reduce the inland extent of the Coastal Environment Overlay.
Paul Avery (S512)	S512.084	CE - O1	Support	We support these objectives.	Retain as notified.
Paul Avery (S512)	S512.085	CE - O2	Support	We support these objectives.	Retain as notified.
Paul Avery (S512)	S512.086	CE - O3	Support in part	The term “functional need” does not go far enough in recognising that some activities are required to operate in the coastal environment e.g. due to the location of mineral deposits.	Amend as follows: To provide for activities which have a functional, technical, operational or locational need to locate in the coastal environment in such a way that the impacts on natural character, landscape, natural features, access and biodiversity values are minimised.
Paul Avery (S512)	S512.087	CE - P1	Support	We support this provision.	Retain as notified.

Paul Avery (S512)	S512.088	CE - P4	Support in part	We believe this policy needs amending.	Include a point c. that provides for activities which have a functional, technical, operational or locational need to locate in the coastal environment.
Paul Avery (S512)	S512.089	CE - P5	Support in part	We support this provision but believe this needs amending.	Amend point d. as follows: Have a functional, technical, locational or operational need to locate within the coastal environment.
Paul Avery (S512)	S512.090	CE - P6	Support	We support this provision.	Retain as notified.
Paul Avery (S512)	S512.091	CE - R1	Support	We support this provision.	Retain as notified.
Paul Avery (S512)	S512.092	CE - R4	Oppose in part	The maximum height limit of buildings and structures should be that specified for the particular zone. The gross ground floor area is too restrictive and should revert to zone rules.	Delete point 2. A. i. Delete point 2. A. iii.
Paul Avery (S512)	S512.093	CE - R5	Oppose in part	We believe this is too restrictive.	Amend to be more enabling of development.
Paul Avery (S512)	S512.094	CE - R6	Oppose in part	We believe this is too restrictive.	Amend to be more enabling of development.
Paul Avery (S512)	S512.095	CE - R7	Oppose in part	We believe this is too restrictive.	Amend to be more enabling of development.
Paul Avery (S512)	S512.096	CE - R8	Oppose in part	We believe this is too restrictive.	Amend to be more enabling of development.
Paul Avery (S512)	S512.097	CE - R9	Oppose in part	We believe this is too restrictive.	Amend to be more enabling of development.

Paul Avery (S512)	S512.098	CE - R10	Oppose in part	We believe this is too restrictive.	Amend to be more enabling of development.
Paul Avery (S512)	S512.099	CE - R11	Oppose in part	We believe this is too restrictive.	Amend to be more enabling of development.
Paul Avery (S512)	S512.100	CE - R12	Oppose in part	We believe this is too restrictive.	Amend to be more enabling of development.
Paul Avery (S512)	S512.101	CE - R14	Oppose in part	We believe this is too restrictive.	Amend to be more enabling of development.
Paul Avery (S512)	S512.102	CE - R15	Oppose in part	We believe this is too restrictive.	Amend to be more enabling of development.
Paul Avery (S512)	S512.103	CE - R16	Oppose in part	We believe this is too restrictive.	Amend to be more enabling of development.
Paul Avery (S512)	S512.104	CE - R17	Oppose in part	We believe this is too restrictive.	Amend to be more enabling of development.
Paul Avery (S512)	S512.105	CE - R18	Oppose in part	We believe this is too restrictive.	Amend to be more enabling of development.
Paul Avery (S512)	S512.106	CE - R19	Oppose in part	We believe this is too restrictive.	Amend to be more enabling of development.
Paul Avery (S512)	S512.107	CE - R21	Oppose in part	We believe this is too restrictive.	Amend to be more enabling of development.
Paul Avery (S512)	S512.108	Overlays	Oppose in part	We understand that there is a possibility that this overlay will be extended from what is notified in the proposed plan. We do not support our properties being included in any extension. Associated provisions take an excessively restrictive	Oppose any extension from what has been notified that would include our properties. Amend associated objectives, policies and rules to be more enabling.

				approach to hazard management and mitigation.	
Paul Avery (S512)	S512.109	Overlays	Oppose in part	We understand that there is a possibility that this overlay will be extended from what is notified in the proposed plan. We do not support our properties being included in any extension. Associated provisions take an excessively restrictive approach to hazard management and mitigation.	Oppose any extension from what has been notified that would include our properties. Amend associated objectives, policies and rules to be more enabling.
Paul Avery (S512)	S512.110	Overlays	Oppose in part	We understand that there is a possibility that this overlay will be extended from what is notified in the proposed plan. We do not support our properties being included in any extension. Associated provisions take an excessively restrictive approach to hazard management and mitigation.	Oppose any extension from what has been notified that would include our properties. Amend associated objectives, policies and rules to be more enabling.
Paul Avery (S512)	S512.111	Overlays	Oppose in part	We understand that there is a possibility that this overlay will be extended from what is notified in the proposed plan. We do not support our properties being included in any extension. Associated provisions take an excessively restrictive	Oppose any extension from what has been notified that would include our properties. Amend associated objectives, policies and rules to be more enabling.

				approach to hazard management and mitigation.	
Paul & Barbara Dunn, Helen & Steve Boon, Ian & Lynley Preston, Jane & Mike Rogers (S556)	S556.001	Rezoning Requests	Oppose	Oppose the zoning of our land at 31 Hans Bay Road, Arahutika, Lake Kaniere as Open Space Zone. This is private land and an inappropriate zone. We are currently subdividing and part of our property is transferring to DOC - this area Lot 3 DP 554303 is appropriately zoned Open Space. For the property remaining in private ownership Settlement Zone - Rural Residential Precinct is appropriate for the lands and the same as surrounding zoning for private land at Hans Bay.	Zone the property at 31 Hans Bay Road, Arahutika, Lake Kaniere - Lots 1 and 2 DP 55403 as Settlement Zone - Rural Residential Precinct.
Paul & Barbara Dunn, Helen & Steve Boon, Ian & Lynley Preston, Jane & Mike Rogers (S556)	S556.002	Natural Features and Landscapes	Oppose	The layer places considerable restrictions on our land and other houses at Hans Bay are not included in the layer	Remove the Outstanding Natural Landscape from the property at 31 Hans Bay Road, Arahutika, Lake Kaniere - Lots 1 and 2 DP 55403

<p>Paul Elwell-Sutton (S144)</p>	<p>S144.001</p>	<p>Ecosystems and Indigenous Biodiversity</p>	<p>Amend</p>	<p>The characteristic ecosystems and indigenous biodiversity of much lowland area of the Coast is poorly or not protected, especially that on privately held land. Lowland ecosystems and biodiversity are poorly represented on West Coast PCL, so these values require assessment and protection. While some landowners may be aware of the ecological values and biodiversity on their properties, and wish to protect it, not all will, so the Plan must be robust and even-handed..</p>	<p>While I support the intention of this section I request that throughout all the Plan's objectives, policies and rules, the health, integrity and life-supporting properties of indigenous ecosystems and biodiversity are comprehensively protected, supported and enhanced, such that all other objectives, policies and rules are overridden by those of the indigenous ecosystems and biodiversity.</p>
<p>Paul Elwell-Sutton (S144)</p>	<p>S144.002</p>	<p>Ecosystems and Indigenous Biodiversity Policies</p>	<p>Amend</p>	<p>Leaving identification of SNAs in Westland, to when a resource consent is applied for is completely unacceptable because it relies on local authority capacity and appropriate expertise, as well as the applicant's honesty and/or ability to recognise a potential SNA on their property. The integrity of SNAs in Westland is gravely compromised in the Plan as it stands. In identifying an SNA, its contribution to mitigating climate change must be taken into</p>	<p>Throughout the West Coast, SNAs must be mapped through recent (within the past 3 years at most) on the ground assessment by qualified, specialised and independent ecologists, and not through aerial/satellite studies and other remote desktop practices, prior to the Plan becoming operative.</p>

				account. That value must be included in this section of the Plan. Landowners with SNAs on their properties must receive recognition and financial relief for any proven loss of income caused by the SNA.	
Paul Finlay (S408)	S408.001	Energy Rules	Support	The West Coast must be able to be self sufficient in energy generation. The provision is for accessway for above ground pressure pipelines with regular holding down anchorages, tunneling where required and diversion of flood flow under the phenomena of Climate Change, increased rainfall and flooding to State Highways and tourist townships and infrastructure. The Wills River, tributary of the Haast River, Haast township is given. Tunnel to unknown, unamed stream, increased flow to Hunter River, to Lake Hawea, and downstream Otago irrigation schemes.	That provision be made for and understanding of the critical need for the reliance on hydro power generation, in respect of resilience pre and post Alpine Fault Rupture, and Climate Change required irrigation.
Paul Finlay (S408)	S408.002	Infrastructure Rules	Amend	Provision for an area of 2000m2 (C. 50m x 40m) at a location near Martyr Saddle, Martyr River, South Westland. Purpose : Erection of a building, with instruments and	Ensure rules provide for monitoring building and equipment to pick up the movement of the plates and Alpine Fault.

				antennae for relaying the first movement of rupture of the Alpine Fault.	
Paul Finlay (S408)	S408.003	Rezoning Requests	Amend	Reservoir is in place, area is above tsunami/coastal hazard risk	Rezone area at Cobden to allow for subdivision: refer to the attached plan in the submission.
Paul Finlay (S408)	S408.004	General Residential Zone	Support	At Hokitika: the Alpine fault rupture, M8.2 probability within the next 50 years will result in:1- Liquefaction of the business area and 'spasmodic' residential locations.2- The demolition of St Mary's catholic Church 3- Falling of some of the simply supported road bridges, SH6.	Make provision for (i) a 'new' Hokitika being the former racecourse. (ii) a 'new' Hokitika being the former Seaview Mental Institution.
Paul Finlay (S408)	S408.005	Rezoning Requests	Amend	Climate change will exacerbate flooding in the Inangahua River.	Identify area for growth of Reefton around Butts Road and Crampton Road - residential and other zones. [refer map in submission]
Paul Finlay (S408)	S408.006	General Residential Zone	Amend	There is a need for subdivision land at Westport at elevations 10-25m above sea level.	Ensure zoning provides for cadastral and subdivision planning including wastewater, water supply and stormwater for a new Westport.
Paul Finlay (S408)	S408.007	Natural Hazards Rules	Amend	Avoidance of Coastal climate change effects. .	Require More rigid foundation for buildings of liquefaction sites of lower Hokitika
Paul Heal (S133)	S133.001	Sites and Areas of Significance to Māori	Oppose	No evidence of SASM.The section was purchased from Mawhera (137 Peel Street, Westport).	Removal of any SASM rules and appellations to all land/sections that have been legally purchased from the local Iwi located in a town within the past 50 years.

Paul Kerridge (S32)	S32.001	Whole plan	Not Stated	The Plan includes no information on how it will be enforced.	Include information in the plan on where and how the plan will be enforced.
Paul Miles (S226)	S226.001	Natural Hazards	Oppose	Proposed District Plan - Natural Hazards Plan S2 shows a large area shown as a "Flood Plain" This indicated flood plain covers what looks to be the entirety of our property, being in part Lot 2 DP3629, Lot 2 DP331707. The area covered by the "Flood plain" hatching includes land that rises significantly as a series of stepped terraces. The base of the Arnold River bridge on SH7, which sits above normal Arnold River flow levels is at 18MRL. Our house sits on a terrace level of 39MRL. Our property rises another 10m on a further terrace. The Orbitaly delineation of the flood plain boundaries on plan 52 looks to have used the straight line technique, does not follow contours, and is essentially lazy and misleading. The flood plain boundaries need to be revised. We should not carry a risk of higher insurance premiums, possible insurability issues & potential	Review the boundaries of the Flood Plain Overlay based on contours and actual flood risk. Look specifically at Lot 2 DP3629, Lot 2 DP331707 and the Arnold River.

				diminished capital value from poor representation of a flood plain, and plan 52 must be reviewed before adoption.	
Paul Thomas (S134)	S134.001	SCHED1A - SCHEDULE OF HISTORIC HERITAGE ITEMS AND AREAS	Amend	<p>The attached submission is supported in its entirety by Runanga Miners' Hall Trust. The Greymouth Coalfields as defined in the attached submission, are not only important for their geological attributes, the tangible physical remnants, but are important for the social, workplace and political dimensions that helped shape Aotearoa New Zealand, and in turn had an influence is shaping those dimensions globally. Copy of attached submission supported</p> <p>Subject: The Historic Mining area of the Southern Paparoas. (We have prepared this submission based on the earlier TTPP exposure draft.) Aim: The Southern Paparoa mining area is a mountainous block of land that contains the vestiges of a complete historic mining economy – the mines (State, co-operative, and privately owned), the communities and the infrastructure including the</p>	Add historic mining area in Southern Paparoas as per GNS Science Report 2010/61 Nov 2010 pg 68 to Historic Heritage schedule as a Historic Area to be known as 'The Historic Mining area of the Southern Paparoa's - the area defined as the Greymouth Coalfields.

			<p>following: prospecting tracks, towns, railways, tramways, bridges and industrial mining equipment. The sustaining of this inherited character should be taken account of when evaluating substantial developments proposed within the area. This is a request for a notation status to be applied to the Historic Mining Area of the Southern Paparoas. To achieve this, we are requesting that the area be listed as one of the West Coast Historic Heritage Items and Areas and Archaeological Sites (aka the HH list), in what has to date been Schedule 1, Part 4 of the Te Tai o Poutini District Plan. We are requesting something like an extended version of the registrations currently held by the Denniston Historical Area (noted at HH5 in the present version of the District Plan), or HH45 listing the Waiuta Historic Area. Similarly, the Reefton historic area is substantially dealt with via a number of individual listings (HH28-HH41). We believe the area of note can be listed in the HH List by</p>	
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				<p>reference to a geologically defined area: the “Greymouth Coalfield” (see map below). Anchored within the area delineated by the Greymouth Coalfield are some acknowledged historic taonga and monuments – the Brunner Mine site (HH53-57) in the south on the eastern side of the Southern Paparoas, and north to Blackball (HH48-52), and on the western side of the Paparoas, the Rūnanga Miners’ Hall (HH47) up to the Strongman Mine memorial. The towns involved would include Dobson, Stillwater, Blackball, Taylorville, Runanga, Dunollie and Rapahoe - as well as the sites of several old towns such as Rewanui, Wallsend and Brunnerton. We also note that as a “Coalfield” is defined geologically as an area in which coal measures have been found, it is a scientific delineation that avoids the complications that can arise when defining areas in terms of land tenure. The idea is two-fold: 1. To initiate a survey/study of the natural and built heritage of the area by</p>	
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			<p>Heritage NZ, evaluating it as a joined-up, holistic whole – in the way the Ruhr Region in Germany promotes and looks upon itself as an “industrial cultural landscape”, and the “Coal Region” is identified in eastern Pennsylvania, USA. This exercise would enrich the geological definition of the initial listing we are proposing.² To add another evaluation lens to any proposals for large developments that may have substantial impact on the built or natural heritage within this zone. We understand that a notation on the list of West Coast Historic Heritage Items and Areas and Archaeological Sites will not impose any sort of new preservation order over such an extensive area - which includes land variously controlled by the State, iwi and private owners – other than where that status already attaches to sites specifically acknowledged as having national heritage status (e.g., the Brunner site, Rūnanga Miners’ Hall, and Blackball sites with Heritage NZ listings). It is envisaged</p>	
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			<p>that this listing will mean that subsequent proposals for substantial new developments in the area should then be required to give some consideration as to how they might affect the “Heritage Dimension” of the Historic Mining Area of the Southern Paparoas. Similarly, future, and existing proposals might be promoted by reference to the “Heritage Dimension” of the new Historic Mining Area of the Southern Paparoas; for example, the establishment of a network of 26 or so Southern Paparua walking/cycling trails based on historic mining infrastructure tracks, rail and tramways which have stood the test of time (as initially proposed c2015). We see this proposal as a way to promote, protect and market the heritage values of the Southern Paparoas in relation to the industrial, social and economic history of New Zealand. A heritage evaluation (undertaken by Heritage NZ) will be a useful educational overlay -</p>	
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			<p>specifically covering the area and infrastructure of the coal-mining activity in the Southern Paparoas since the 1860s. We note that there will be other initiatives which will sit alongside and enhance the concept of The Historic Mining area of the Southern Paparoas. For instance, there is clearly some geographic cross-over with some of the considerations around the status of the Paparoa National Park and areas nearby. We see those concerns relating more to the "natural heritage" of those areas, while we are trying to raise the profile of an integrated zone of both "built heritage" and natural environmental features. But the initiatives should compliment each other. As residents of the area with a passion to explain the unique nature of the history that has been made in the Southern Paparoas, we commend the concept of the recognition of the The Historic Mining area of the Southern Paparoas as one of the West Coast Historic Heritage Items and Areas</p>	
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			<p>and Archaeological Sites, within the Te Tai o Poutini District Plan. Jo Hart and Russell Deyell, 6 Railway Tce, Runanga Taken from: Mineral resource assessment of the West Coast Region, New Zealand A.B. Christie R.G. Barker R.L. Brathwaite (GNS Science Report 2010/61 November 2010) P68 Nb – the status of some of the mines marked has changed since 2010 Nb – through designating the proposed Historic Mining area of the Southern Paparoas by reference to the “Greymouth Coalfield” - which is a defined geological area mapped over many years by the Institute of Geological and Nuclear Sciences Limited (GNS Science, Te Pū Ao) - we are delineating the area for recognition from other historic coal-mining locales on the West Coast (including Pike River) which are separate Coalfields (refer map in submission). Many of these other Coalfields already have local or national historic recognition. [refer original submission for more detail]</p>	
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<p>Pete McDonnell (S281)</p>	<p>S281.001</p>	<p>Sites and Areas of Significance to Māori Rules</p>	<p>Amend</p>	<p>We accept that areas significant to Maori are included in the TTPP - history contributes to the fabric of the West Coast as we know it today. However history should not, on its own, be an encumbrance on individual property owners' rights. Our property has been included in SASM 104 Kawhaka Catchment. It covers a random area of our property (to us - we can walk in a straight line from our house to the Fox Creek boundary, a distance of approx. 800m and be in, out, back in and out again of the SASM). It has no rules associated with it. In the 15 years we have owned this property no representative of Ngai Tahu or local iwi have ever approached us regarding the significance of the area to them. We bought our property as unencumbered, freehold land. It had been significantly developed and modified prior to us owning it and to my knowledge no historical artefacts or any thing of significance has been found. Therefore nothing needs to be recorded against our property, all</p>	<p>That SASMs with no rules applicable are not required to be recorded on District Council individual property LIM reports and that no additional or subsequent rules can be applied to SASMs.</p>
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				existing property rights should remain and no rights divested to any other group or individual.	
Pete McDonnell (S281)	S281.002	Whole plan	Neutral	Is this plan more enabling than existing plans? No! Too many rules and policy open to interpretation and therefore influence by pressure and lobby groups. The rights of freehold landowners and the ability for people to go about their everyday lives will be further diminished under this plan. No recognition of the disabled community.	No decision sought, except maybe start again with a more enabling mindset.
Peter Dawson (S44)	S44.001	Whole plan	Oppose	Council should have no say on privately owned property, This proposal is really moving into a socialist way of thinking not the democratic society we live why is this.	Remove restrictions on Private property.
Peter Dawson (S44)	S44.002	Whole plan	Not Stated	Copies of the proposal to made in both English and also Maori languages, this mixture of the two languages is disrespectful of the two main cultures here in New Zealand and leaves the proposal too hard to understand as most people in this	Print this out in English and a Maori version separately.

				country are not fluent in Te Rea Maori.	
Peter Haddock (S417)	S417.001	General Industrial Zone	Support	I support the change to Industrial zoning the land at 42 Jacks Road, Greymouth. When this land was purchased, the Grey County Council agreed to change the zoning to Industrial but this was never done and was lost in the amalgamation of the Grey County Council and Greymouth Borough Councils into the Grey District Council.	Retain industrial zoning of land at 42 Jacks Road Greymouth
Peter Haddock (S417)	S417.002	Rezoning Requests	Amend	I wish to submit on the property Quadrello Holdings Ltd own on Taylorville Road Coal Creek valuation 25420/375.07 Legal Desk PT Sect 121 SQ 119. Quadrello Holdings Ltd wish it noted that there is an existing Gravel Extraction Quarry on the land which has been in existence for 35 plus years and is still active	Rezone the land at on the property Quadrello Holdings Ltd own on Taylorville Road Coal Creek valuation 25420/375.07 Legal Desk PT Sect 121 SQ 119 to Mineral Extraction Zone
Peter Haddock (S417)	S417.003	Natural Hazards	Oppose	My wife and I own a property at 3 Webb Street, Punakaiki. There is no evidence to show rockfalls have ever encroached on to our property from Alpine Fault events or other. The zone goes through our property. I would suggest the zone aligns with	Remove the property at 3 Webb Street Punakaiki from the natural hazard land instability overlay.

				our eastern boundary which would take the property out of the Natural Hazard zone.	
Peter Haddock (S417)	S417.004	Whole plan	Support in part	I believe the Te Tai o Poutini Plan to be an excellent update to the 3 district Plans. Should the local government review determine in the future that one Unitary Council is necessary then this Plan will be in place.	Not stated
Peter Haddock (S417)	S417.005	Future Urban Zone	Support	I support the rezoning of the valuation 2548017102 Assessment 846592 Part 249 Main South Road Haddock Group Properties to future residential. This land is an extension of the Karoro township and would be future residential.	Retain the Future Urban Zone over land at valuation 2548017102 Assessment 846592 Part 249 Main South Road
Peter Haddock (S417)	S417.006	Sites and Ares of Significance to Māori	Oppose	The whole of the property at 3 Webb Street has been disturbed by either buildings extensions, construction of driveways and paths and the installation of a septic tank system and field drains. The balance of the property has had the lawn area reshaped and replanted. I believe the Punakaiki township was only a food gathering area and hence the Kai in Punakaiki.	Remove the SASM from the property at 3 Webb Street Punakaiki

Peter Haddock (S417)	S417.007	Mineral Extraction Zone	Support	I support the Mineral Extraction Zones as the industry is a huge financial income stream for our region and also the wider NZ economy. The opportunity for work for our young people through apprenticeships and jobs in the supporting industries is important to retain our youth is higher paying employment.	Retain mineral extraction zone
Peter Haddock (S417)	S417.008	GRUZ - R12	Support	I support the mining areas in rural areas being a permitted activity.	Retain the rule as notified
Peter Jefferies (S544)	S544.001	Planning Maps and Overlays	Oppose	I oppose the fact that the designation is arbitrary and does not relate to a technical assessment of Land Use Capability,	Remove the highly productive land precinct from the property (Lot 1 DP 3467, Section 2 BLK XV Waiwhero SD, Lot 1 DP 2743) in the Grey Valley, at 843 Atarau Road,
Peter Jefferies (S544)	S544.002	SUB - S1	Oppose	I object to a 10 hectare subdivision limit on my land given the conditions. I consider this is not consistent with the existing pattern of land use in the area.	Remove the subdivision restrictions over the Highly Productive Land precinct.
Peter Jefferies (S544)	S544.003	RURZ - O1	Oppose	I oppose objectives, policies and rules seeking avoidance of fragmentation of the land and lack of ability to have adequate input.	Remove reference to highly productive land

Peter Jefferies (S544)	S544.004	GRUZ - PREC 5 - Highly Productive Land Precinct Policy	Oppose	I oppose objectives, policies and rules seeking avoidance of fragmentation of the land and lack of ability to have adequate input. [refer submission for detailed reasons]	Delete policy
Peter Jefferies (S544)	S544.005	GRUZ - R3	Oppose	I oppose objectives, policies and rules seeking avoidance of fragmentation of the land and lack of ability to have adequate input. [refer submission for detailed	Delete provisions around highly productive land.
Peter Jefferies (S544)	S544.006	SUB - R6	Oppose	I oppose the fact that the designation is arbitrary and does not relate to a technical assessment of Land Use Capability,	Delete provisions in relation to highly productive land.
Peter Jefferies (S544)	S544.007	SUB - R8	Oppose	I oppose the fact that the designation is arbitrary and does not relate to a technical assessment of Land Use Capability,	Delete provisions in relation to highly productive land
Peter Jefferies (S544)	S544.008	Natural Hazards	Oppose	The mapping is arbitrary with highly inaccurate information. I am concerned about the insurance implications and additional cost.	Remove the flood plain overlay from Lot 1 DP 3467, Section 2 BLK XV Waiwhero SD, Lot 1 DP 2743) in the Grey Valley, at 843 Atarau Road,
Peter Jefferies (S544)	S544.009	SUB - R23	Oppose	The mapping is arbitrary with highly inaccurate information. I am concerned about the insurance implications and additional cost.	Delete the reference to the flood plain overlay in the rule

Peter Langford (S615)	S615.001	INTENSIVE INDOOR PRIMARY PRODUCTION	Amend	definition could inadvertently capture herd homes and wintering barns	Amend as follows: Means primary production activities that principally occur within buildings and involve growing fungi, or keeping or rearing livestock (excluding calf-rearing for a specified time period) or poultry. The use of herd homes and wintering barns where the primary production activity principally otherwise occurs in an outdoor environment is not included in this definition.
Peter Langford (S615)	S615.002	Definitions	Amend	We believe that there needs to be a clear definition for “offensive industries”.	Develop a definition for “offensive industries”.
Peter Langford (S615)	S615.003	Definitions	Support	Needs to be a clear definition for “hazardous facilities	Develop a definition for “hazardous facilities”.
Peter Langford (S615)	S615.004	AG - O1	Support	support the various Strategic Objectives and Policies.	Retain
Peter Langford (S615)	S615.005	AG - O2	Support	support the various Strategic Objectives and Policies.	Retain
Peter Langford (S615)	S615.006	CR - O1	Support	support the various Strategic Objectives and Policies.	Retain

Peter Langford (S615)	S615.007	CR - O2	Support		Retain
Peter Langford (S615)	S615.008	CR - O3	Support		Retain
Peter Langford (S615)	S615.009	CR - O4	Support		Retain
Peter Langford (S615)	S615.010	MIN - O1	Support		Retain
Peter Langford (S615)	S615.011	MIN - O2	Support		Retain
Peter Langford (S615)	S615.012	MIN - O3	Support		Retain
Peter Langford (S615)	S615.013	MIN - O4	Support		Retain
Peter Langford (S615)	S615.014	MIN - O5	Support		Retain
Peter Langford (S615)	S615.015	MIN - O6	Support		Retain

Peter Langford (S615)	S615.016	NENV- O1	Support		Retain
Peter Langford (S615)	S615.017	NENV- O2	Support		Retain
Peter Langford (S615)	S615.018	NENV - O3	Support		Retain
Peter Langford (S615)	S615.019	NENV - O4	Support		Retain
Peter Langford (S615)	S615.020	TRN - O1	Support		Retain
Peter Langford (S615)	S615.021	TRN - O2	Support		Retain
Peter Langford (S615)	S615.022	TRN - O3	Support		Retain
Peter Langford (S615)	S615.023	TRN - O4	Support		Retain
Peter Langford (S615)	S615.024	TRN - O5	Support		Retain

Peter Langford (S615)	S615.025	HS - O1	Support		Retain
Peter Langford (S615)	S615.026	HS - P1	Support		Retain
Peter Langford (S615)	S615.027	HS - P2	Support		Retain
Peter Langford (S615)	S615.028	HS - P3	Support		Retain
Peter Langford (S615)	S615.029	HS - P4	Support		Retain
Peter Langford (S615)	S615.030	Flood Severe Overlay and Flood Susceptibility Overlay	Support	that there are no land use rules for the flood plain overlay and this overlay relates only to the subdivision rules.	Retain no land use rules for the Flood Plain Overlay.
Peter Langford (S615)	S615.031	Natural Hazards Objectives	Amend	the role that protective structures play in natural hazard mitigation needs to be recognised in the Natural Hazards Objectives.	Add a new objective: To ensure the role of hazard mitigation played by protective structures and works that minimise impacts of hazards including rock walls and stopbanks is recognised and protected.

Peter Langford (S615)	S615.032	NHP12	Support		Retain
Peter Langford (S615)	S615.033	NHR1	Amend	Two and five years is an insufficient length of time for reconstruction/replacement.	Amend rule so that there is a ten year period within which lawfully established buildings can be reconstructed/replaced in all overlays or delete time limit.
Peter Langford (S615)	S615.034	NHR12	Support		Retain
Peter Langford (S615)	S615.035	NHR13	Support		Retain
Peter Langford (S615)	S615.036	NHR38	Amend	Two and five years is an insufficient length of time for reconstruction/replacement and there is no activity status where compliance is not achieved.	Amend rule so that there is a ten year period within which lawfully established buildings can be reconstructed/replaced in all overlays or delete time limit and if compliance is not achieved, this should be a Discretionary Activity.
Peter Langford (S615)	S615.037	NHR39	Support		Retain
Peter Langford (S615)	S615.038	NHR40	Amend	Point two in this rule is too restrictive.	Delete point 2. Where any increase in net floor area meets a minimum finished floor level of 300mm above a 1% annual exceedance probability (AEP) event.

Peter Langford (S615)	S615.039	NHR43	Support		Retain
Peter Langford (S615)	S615.040	ECO- O1	Support		Retain
Peter Langford (S615)	S615.041	ECO - P1	Amend	Believe that a June 2027 deadline is too ambitious to undertake the work in a way that sufficiently involves landowners.	Delete “and completed by June 2027” from point 2. iii.
Peter Langford (S615)	S615.042	ECO - P2	Amend	The term “functional need” does not go far enough in recognising that some activities are required to operate in certain areas	Amend point d. as follows: The activity has a functional, technical, operational or locational need to be located in the area;
Peter Langford (S615)	S615.043	ECO - P3	Support		Retain
Peter Langford (S615)	S615.044	ECO - P6	Support	Believe that some of the terms used in this policy need defining.	Define the technical ecological terms used in this policy.
Peter Langford (S615)	S615.045	ECO - P7	Support	that this policy provides for the appropriateness of any biodiversity offsetting or compensation in accordance with Policy 9	Retain point h
Peter Langford (S615)	S615.046	ECO - P7	Amend	there could be significant adverse effects as a result of SNA mapping if the fixed location of mineral deposits	Amend to recognise that, in some instances, vegetation clearance is unavoidable (e.g. in the case of accessing mineral resource) but that these effects can

				is not provided for in the policy and the temporary nature of mining is not recognised.	be temporary due so subsequent restoration processes.
Peter Langford (S615)	S615.047	ECO - P8	Support		Retain
Peter Langford (S615)	S615.048	ECO - P9	Support		Retain
Peter Langford (S615)	S615.049	ECO - P10	Support		Retain
Peter Langford (S615)	S615.050	ECO - R1	Amend	Believe this is too restrictive.	Amend to be more enabling of development.
Peter Langford (S615)	S615.051	ECO - R2	Amend	Believe this is too restrictive.	Amend to be more enabling of development.
Peter Langford (S615)	S615.052	ECO - R3	Amend	Believe this is too restrictive.	Amend to be more enabling of development.
Peter Langford (S615)	S615.053	ECO - R5	Amend	Believe this is too restrictive.	Amend to be more enabling of development.
Peter Langford (S615)	S615.054	ECO - R7	Amend	Believe this is too restrictive	Amend to be more enabling of development.

Peter Langford (S615)	S615.055	ECO - R10	Support		Retain
Peter Langford (S615)	S615.056	ECO - R11	Support		Retain
Peter Langford (S615)	S615.057	NFL - R14	Support		Retain
Peter Langford (S615)	S615.058	NFL - R15	Support		Retain
Peter Langford (S615)	S615.059	Overview	Support		Retain
Peter Langford (S615)	S615.060	PA - O1	Support		Retain
Peter Langford (S615)	S615.061	NC - O1	Support		Retain
Peter Langford (S615)	S615.062	NC - O2	Support		Retain
Peter Langford (S615)	S615.063	NC - O3	Support		Retain

Peter Langford (S615)	S615.064	NC - P1	Support		Retain
Peter Langford (S615)	S615.065	NC - P2	Support		Retain
Peter Langford (S615)	S615.066	NC - P3	Support		Retain
Peter Langford (S615)	S615.067	NC - P4	Support		Retain
Peter Langford (S615)	S615.068	NC - P5	Support		Retain
Peter Langford (S615)	S615.069	SUB - P6	Support	that this policy seeks to minimise reverse sensitivity issues.	Retain point d. as notified.
Peter Langford (S615)	S615.070	SUB - R5	Amend	We support this rule in principle but believe some amendments are necessary.	Delete reference to “development plan” unless a better definition is supplied.
Peter Langford (S615)	S615.071	SUB - R5	Amend	Support this rule in principle but believe some amendments are necessary.	Amend wording “design and layout of allotments” to refer to 15mx15m building platform or similar specification that is more certain.
Peter Langford (S615)	S615.072	SUB - R5	Amend	Support this rule in principle but believe some amendments are necessary.	Delete point j. under Matters of Control.

Peter Langford (S615)	S615.073	SUB - R6	Amend	Support this rule in principle but believe some amendments are necessary.	Amend to be less restrictive.
Peter Langford (S615)	S615.074	SUB - R7/ECO - R4	Amend	Support this rule in principle but believe some amendments are necessary.	Amend to be less restrictive.
Peter Langford (S615)	S615.075	SUB - R9/ECO - R6	Oppose	This is too restrictive.	Delete points 2 and 3.
Peter Langford (S615)	S615.076	SUB - R13	Support		Retain
Peter Langford (S615)	S615.077	SUB - R14	Oppose	We believe this activity should just be discretionary with no conditions.	Delete point 1.
Peter Langford (S615)	S615.078	SUB - R14	Amend	We believe this activity should just be discretionary with no conditions.	Amend "Non-complying" to "N/A" under "Activity status where compliance not achieved".
Peter Langford (S615)	S615.079	SUB - R15/ECO - R8	Oppose	This is too restrictive.	Delete points 1 and 2.
Peter Langford (S615)	S615.080	SUB - R15/ECO - R8	Amend	This is too restrictive.	Amend "Non-complying" to "N/A" under "Activity status where compliance not achieved".
Peter Langford (S615)	S615.081	SUB - R23	Support		Retain

Peter Langford (S615)	S615.082	SUB - R25	Oppose		Delete
Peter Langford (S615)	S615.083	SUB - R27/ECO - R9	Oppose		Delete
Peter Langford (S615)	S615.084	Coastal Environment	Amend	This overlay is far too extensive. The extent inland that the overlay covers is inappropriate and will unduly restrict development.	Amend and reduce the inland extent of the Coastal Environment Overlay.
Peter Langford (S615)	S615.085	CE - O1	Support		Retain
Peter Langford (S615)	S615.086	CE - O2	Support		Retain
Peter Langford (S615)	S615.087	CE - O3	Support	The term “functional need” does not go far enough in recognising that some activities are required to operate in the coastal environment e.g. due to the location of mineral deposits.	Amend as follows: To provide for activities which have a functional, technical, operational or locational need to locate in the coastal environment in such a way that the impacts on natural character, landscape, natural features, access and biodiversity values are minimised.
Peter Langford (S615)	S615.088	CE - P1	Support		Retain

Peter Langford (S615)	S615.089	CE - P4	Amend	Believe this policy needs amending.	Include a point c. that provides for activities which have a functional, technical, operational or locational need to locate in the coastal environment.
Peter Langford (S615)	S615.090	CE - P5	Amend	Support this provision but believe this needs amending.	Amend point d. as follows: Have a functional, technical, locational or operational need to locate within the coastal environment.
Peter Langford (S615)	S615.091	CE - P6	Support		Retain
Peter Langford (S615)	S615.092	CE - R1	Support		Retain
Peter Langford (S615)	S615.093	CE - R4	Oppose	The maximum height limit of buildings and structures should be that specified for the particular zone.	Delete point 2. A. i.
Peter Langford (S615)	S615.094	CE - R4	Oppose	The gross ground floor area is too restrictive and should revert to zone rules.	Delete point 2. A. iii.
Peter Langford (S615)	S615.095	CE - R5	Amend	We believe this is too restrictive.	Amend to be more enabling of development
Peter Langford (S615)	S615.096	CE - R6	Amend	We believe this is too restrictive.	Amend to be more enabling of development

Peter Langford (S615)	S615.097	CE - R7	Amend	We believe this is too restrictive.	Amend to be more enabling of development
Peter Langford (S615)	S615.098	CE - R8	Amend	We believe this is too restrictive.	Amend to be more enabling of development
Peter Langford (S615)	S615.099	CE - R9	Amend	We believe this is too restrictive.	We believe this is too restrictive. Amend to be more enabling of development
Peter Langford (S615)	S615.100	CE - R10	Amend	We believe this is too restrictive.	Amend to be more enabling of development
Peter Langford (S615)	S615.101	CE - R11	Amend	We believe this is too restrictive.	Amend to be more enabling of development
Peter Langford (S615)	S615.102	CE - R12	Amend	We believe this is too restrictive.	Amend to be more enabling of development
Peter Langford (S615)	S615.103	CE - R14	Amend	We believe this is too restrictive.	Amend to be more enabling of development
Peter Langford (S615)	S615.104	CE - R15	Amend	We believe this is too restrictive.	Amend to be more enabling of development
Peter Langford (S615)	S615.105	CE - R17	Amend	We believe this is too restrictive.	Amend to be more enabling of development

Peter Langford (S615)	S615.106	CE - R18	Amend	We believe this is too restrictive.	Amend to be more enabling of development
Peter Langford (S615)	S615.107	CE - R19	Amend	We believe this is too restrictive.	Amend to be more enabling of development
Peter Langford (S615)	S615.108	CE - R21	Amend	We believe this is too restrictive.	Amend to be more enabling of development
Peter Langford (S615)	S615.109	EW - O1	Support		Retain
Peter Langford (S615)	S615.110	EW - P1	Support		Retain
Peter Langford (S615)	S615.111	EW - P2	Amend		Retain
Peter Langford (S615)	S615.112	EW - P3	Support		Retain
Peter Langford (S615)	S615.113	EW - P4	Support		Retain
Peter Langford (S615)	S615.114	EW - R2	Amend	Earthworks rules are difficult to understand in the way they are currently structured.	Amend to provide more clarity.

Peter Langford (S615)	S615.115	EW - R3	Amend	Earthworks rules are difficult to understand in the way they are currently structured.	Amend to provide more clarity.
Peter Langford (S615)	S615.116	EW - R2	Amend	Believe these rules are too restrictive.	Amend to be more enabling of development
Peter Langford (S615)	S615.117	EW - R3	Amend	We believe these rules are too restrictive.	Amend to be more enabling of development
Peter Langford (S615)	S615.118	EW - R6	Support		Retain
Peter Langford (S615)	S615.119	EW - R7	Support		Retain
Peter Langford (S615)	S615.120	EW - R8	Support		Retain
Peter Langford (S615)	S615.121	LIGHT - O1	Support		Retain
Peter Langford (S615)	S615.122	LIGHT - P1	Support		Retain
Peter Langford (S615)	S615.123	LIGHT - P2	Amend	Believe that this policy should extend to appropriate lighting of	Amend to include the enabling of artificial outdoor lighting that allows safe commercial and industrial activities.

				outdoor commercial/industrial activities.	
Peter Langford (S615)	S615.124	LIGHT - R1	Amend	These rules are too complicated and restrictive.	Amend significantly to reduce complexity and be more enabling of development.
Peter Langford (S615)	S615.125	LIGHT - R2	Amend	These rules are too complicated and restrictive.	Amend significantly to reduce complexity and be more enabling of development.
Peter Langford (S615)	S615.126	LIGHT - R3	Amend	These rules are too complicated and restrictive.	Amend significantly to reduce complexity and be more enabling of development.
Peter Langford (S615)	S615.127	LIGHT - R4	Amend	These rules are too complicated and restrictive.	Amend significantly to reduce complexity and be more enabling of development.
Peter Langford (S615)	S615.128	NOISE - O1	Support		Retain
Peter Langford (S615)	S615.129	NOISE - O2	Support		Retain
Peter Langford (S615)	S615.130	NOISE - O3	Support		Retain
Peter Langford (S615)	S615.131	NOISE - P1	Support		Retain

Peter Langford (S615)	S615.132	NOISE - P2	Support		Retain
Peter Langford (S615)	S615.133	NOISE - P4	Support		Retain
Peter Langford (S615)	S615.134	NOISE - R5	Amend	Reverse sensitivity concerns regarding quarry operations.	Amend to further mitigate reverse sensitivity issues for the Karamea Lime Co quarry.
Peter Langford (S615)	S615.135	NOISE - R5	Oppose	Timeframes for noise emissions are too restrictive.	Delete time restrictions
Peter Langford (S615)	S615.136	NOISE - R6	Oppose	Timeframes for noise emissions are too restrictive.	Delete time restrictions
Peter Langford (S615)	S615.137	NOISE - R11	Oppose	Timeframes for noise emissions are too restrictive.	Delete time restrictions
Peter Langford (S615)	S615.138	NOISE - R6	Amend	Reverse sensitivity concerns regarding quarry operations.	Amend to further mitigate reverse sensitivity issues for the Karamea Lime Co quarry.
Peter Langford (S615)	S615.139	NOISE - R11	Amend	Reverse sensitivity concerns regarding quarry operations.	Amend to further mitigate reverse sensitivity issues for the Karamea Lime Co quarry.
Peter Langford (S615)	S615.140	NOISE - R11	Amend	Correct the error where a Mineral Extraction Zone is referred to as "MEZ".	Correct "MEZ" error.

Peter Langford (S615)	S615.141	RURZ - O1	Support		Retain
Peter Langford (S615)	S615.142	RURZ - O2	Support		Retain
Peter Langford (S615)	S615.143	RURZ - O3	Support		Retain
Peter Langford (S615)	S615.144	RURZ - O4	Support		Retain
Peter Langford (S615)	S615.145	RURZ - O5	Support		Retain
Peter Langford (S615)	S615.146	RURZ - O6	Support		Retain
Peter Langford (S615)	S615.147	RURZ - P1	Support		Retain
Peter Langford (S615)	S615.148	RURZ - P2	Support		Retain
Peter Langford (S615)	S615.149	RURZ - P3	Support		Retain

Peter Langford (S615)	S615.150	RURZ - P4	Support		Retain
Peter Langford (S615)	S615.151	RURZ - P5	Support		Retain
Peter Langford (S615)	S615.152	RURZ - P6	Support		Retain
Peter Langford (S615)	S615.153	RURZ - P7	Support		Retain
Peter Langford (S615)	S615.154	RURZ - P8	Support		Retain
Peter Langford (S615)	S615.155	RURZ - P9	Support		Retain
Peter Langford (S615)	S615.156	RURZ - P10	Support		Retain
Peter Langford (S615)	S615.157	RURZ - P11	Support		Retain
Peter Langford (S615)	S615.158	RURZ - P12	Support		Retain

Peter Langford (S615)	S615.159	RURZ - P15	Support		Retain
Peter Langford (S615)	S615.160	RURZ - P16	Support		Retain
Peter Langford (S615)	S615.161	RURZ - P17	Support		Retain
Peter Langford (S615)	S615.162	RURZ - P18	Support		Retain
Peter Langford (S615)	S615.163	RURZ - P19	Support		Retain
Peter Langford (S615)	S615.164	RURZ - P20	Support		Retain
Peter Langford (S615)	S615.166	RURZ - P21	Support		Retain
Peter Langford (S615)	S615.167	RURZ - P22	Support		Retain
Peter Langford (S615)	S615.168	RURZ - P22	Support		Retain

Peter Langford (S615)	S615.169	RURZ - P23	Support		Retain
Peter Langford (S615)	S615.170	RURZ - P24	Support		Retain
Peter Langford (S615)	S615.171	RURZ - P25	Support		Retain
Peter Langford (S615)	S615.172	RURZ - P26	Support		Retain
Peter Langford (S615)	S615.173	RURZ - P27	Support		Retain
Peter Langford (S615)	S615.174	RURZ - P28	Support		Retain
Peter Langford (S615)	S615.175	Rezoning Requests	Amend	Lot 1 DP 483059 has been zoned GRUZ. This parcel should be zoned MINZ – Mineral Extraction Zone.	Amend so that Lot 1 DP 483059 is zoned MINZ – Mineral Extraction Zone.
Peter Langford (S615)	S615.176	GRUZ	Support	Zoning will minimise reverse sensitivity impacts on the quarry.	Retain the General Rural Zone for land to the north, west and south of the quarry area (including quarried land and permitted land)
Peter Langford (S615)	S615.177	GRUZ - R1	Amend	Amend to allow for existing non-compliance	Amend rule to allow for non-compliance for existing activity

Peter Langford (S615)	S615.178	GRUZ - R2	Amend	Amend to allow for existing non-compliance	Amend rule to allow for non-compliance for existing activity
Peter Langford (S615)	S615.179	GRUZ - R3	Amend	Amend to allow for existing non-compliance	Amend rule to allow for non-compliance for existing activity
Peter Langford (S615)	S615.180	GRUZ - R5	Oppose	Believe this rule should be simplified.	Simplify the rule
Peter Langford (S615)	S615.181	GRUZ - R5	Amend	Amend to allow for existing non-compliance	Amend rule to allow for non-compliance for existing activity
Peter Langford (S615)	S615.182	GRUZ - R6	Support		Retain
Peter Langford (S615)	S615.183	GRUZ - R8	Amend	Amend to allow for existing non-compliance	Amend rule to allow for non-compliance for existing activity
Peter Langford (S615)	S615.184	GRUZ - R9	Amend	Amend to allow for existing non-compliance	Amend rule to allow for non-compliance for existing activity
Peter Langford (S615)	S615.185	GRUZ - R10	Amend	Amend to allow for existing non-compliance	Amend rule to allow for non-compliance for existing activity
Peter Langford (S615)	S615.186	GRUZ - R11	Oppose	Believe the rule is also too restrictive.	Delete point 3 or extend the timeframe until a period after cessation of mining activity.

Peter Langford (S615)	S615.187	GRUZ - R11	Amend	Not all prospecting or exploration is required to have a permit from NZPAM	Amend point 1 as follows: This is authorised under a prospecting or exploration permit from NZPAM where legally required
Peter Langford (S615)	S615.188	GRUZ - R12	Amend	Transport Performance Standards and rules relating to light need to be amended before this rule is acceptable.	Improve the Transport Performance Standards and rules relating to light that connect to this rule.
Peter Langford (S615)	S615.189	GRUZ - R12	Amend	Believe the rule is also too restrictive.	Amend to be more enabling of development.
Peter Langford (S615)	S615.190	GRUZ - R13	Amend	note the minor error.	Retain as notified with minor timing error being corrected (i.e. 12pm).
Peter Langford (S615)	S615.191	GRUZ - R16	Amend	Amend to allow for existing non-compliance	Amend rule to allow for non-compliance for existing activity
Peter Langford (S615)	S615.192	GRUZ - R17	Amend	Amend to allow for existing non-compliance	Amend rule to allow for non-compliance for existing activity
Peter Langford (S615)	S615.193	GRUZ - R18	Support		Retain
Peter Langford (S615)	S615.194	GRUZ - R20	Amend	Amend to allow for existing non-compliance	Amend rule to allow for non-compliance for existing activity

Peter Langford (S615)	S615.195	GRUZ - R21	Amend	Amend to allow for existing non-compliance	Amend rule to allow for non-compliance for existing activity
Peter Langford (S615)	S615.196	GRUZ - R22	Amend	Amend to allow for existing non-compliance	Amend rule to allow for non-compliance for existing activity
Peter Langford (S615)	S615.197	GRUZ - R24	Amend	Amend to allow for existing non-compliance	Amend rule to allow for non-compliance for existing activity
Peter Langford (S615)	S615.198	GRUZ - R25	Support		Retain
Peter Langford (S615)	S615.199	GRUZ - R26	Support		Retain
Peter Langford (S615)	S615.200	GRUZ - R27	Support		Retain
Peter Langford (S615)	S615.201	GRUZ - R28	Support		Retain
Peter Langford (S615)	S615.202	GRUZ - R29	Support		Retain
Peter Langford (S615)	S615.203	GRUZ - R30	Amend	Rule is unclear	Amend with more clearly defined terms

Peter Langford (S615)	S615.204	GRUZ - R30	Oppose	rule is too restrictive	Delete points 1 and 2.
Peter Langford (S615)	S615.205	GRUZ - R30	Support	rule is too restrictive	Amend "Non-complying" to "N/A" under "Activity status where compliance not achieved".
Peter Langford (S615)	S615.206	GRUZ - R31	Oppose	This rule is too restrictive.	Delete point 1.
Peter Langford (S615)	S615.207	GRUZ - R31	Amend		Amend "Non-complying" to "N/A" under "Activity status where compliance not achieved".
Peter Langford (S615)	S615.208	GRUZ - R32	Support		Retain
Peter Langford (S615)	S615.209	GRUZ - R33	Support		Retain
Peter Langford (S615)	S615.210	GRUZ - R34	Oppose	Rule is unnecessarily restrictive.	Delete
Peter Langford (S615)	S615.211	Overview	Amend	support though note effects of activities with existing use rights.	Amend to add a 4th point to include existing use rights
Peter Langford (S615)	S615.212	Mineral Extraction Zone	Support	support zoning for Section 1 SO 15488 and Section 50 Blk IX Oparara SD	Retain

Peter Langford (S615)	S615.213	Rezoning Requests	Support	oppose that Lot 1 DP 483059 has been zoned GRUZ.	Amend Lot 1 DP 483059 to MINZ – Mineral Extraction Zone
Peter Langford (S615)	S615.214	MINZ - O1	Support		Retain
Peter Langford (S615)	S615.215	MINZ - O2	Support		Retain
Peter Langford (S615)	S615.216	Mineral Extraction Policies	Support		Retain
Peter Langford (S615)	S615.217	MINZ - R1	Amend	support the principle of this rule. However, point two is unnecessarily restrictive.	Delete point 2.
Peter Langford (S615)	S615.218	MINZ - R2	Support		REtain
Peter Langford (S615)	S615.219	MINZ - R3	Amend	Point two is unnecessarily restrictive.	Delete point 2.
Peter Langford (S615)	S615.220	MINZ - R2	Support	Amend to allow for existing non-compliance	Amend rule to allow for non-compliance for existing activity
Peter Langford (S615)	S615.221	MINZ - R5	Support		Retain

Peter Langford (S615)	S615.222	MINZ - R6	Support		Retain
Peter Langford (S615)	S615.223	MINZ - R7	Support		Retain
Peter Langford (S615)	S615.224	MINZ - R9	Support		Retain
Peter Langford (S615)	S615.225	MINZ - R10	Oppose		Delete
Peter Langford (S615)	S615.226	SCHED4 - SCHEDULE OF SIGNIFICANT NATURAL AREAS	Support	support that areas will be identified through the resource consent process	Retain Schedule
Peter Langford (S615)	S615.227	SCHED4 - SCHEDULE OF SIGNIFICANT NATURAL AREAS	Amend	June 2027 deadline is too ambitious to undertake the work in a way that sufficiently involves landowners.	Subsequent amendment to ECO-P1
Peter Langford (S615)	S615.228	SCHED5 - SCHEDULE OF OUTSTANDING NATURAL LANDSCAPES	Support	Support that Lot 1 DP 483059, Section 1 SO 15488 and Section 50 Blk IX Oparara SD are not included	Retain as notified

Peter Langford (S615)	S615.229	SCHED6 - SCHEDULE OF OUTSTANDING NATURAL FEATURES	Support	support that Lot 1 DP 483059, Section 1 SO 15488 and Section 50 Blk IX Oparara SD are not included	Retain as notified
Peter Langford (S615)	S615.230	SCHED7 - SCHEDULE OF HIGH COASTAL NATURAL CHARACTER	Support	support that Lot 1 DP 483059, Section 1 SO 15488 and Section 50 Blk IX Oparara SD are not included	Retain as notified
Peter Langford (S615)	S615.231	SCHED8 - SCHEDULE OF OUTSTANDING COASTAL NATURAL CHARACTER	Support	support that Lot 1 DP 483059, Section 1 SO 15488 and Section 50 Blk IX Oparara SD are not included	Retain as notified
Peter Langford (S615)	S615.232	SCHED9 - LAWFULLY ESTABLISHED MINERAL EXTRACTION AND PROCESSING AREAS	Support	support that the Karamea Lime Quarry is listed	Retain Schedule as notified
Peter Langford (S615)	S615.233	TRNTable 1	Amend	Unnecessarily restrictive and complex	Amend to be less onerous

Peter Langford (S615)	S615.234	TRNTable 1	Amend	There also appear to be potential errors in the table	Amend to correct errors
Peter Langford (S615)	S615.235	Appendix One: Transport Performance Standards	Support	The qualifiers are not consistent, and this makes the table difficult to use.	Amend to be more consistent and correct errors.
Peter Langford (S615)	S615.236	Appendix Seven: Mineral Extraction Management Plan Requirements	Support	support the plan requirements.	Retain as notified.
P. Faith Quinn (S266)	S266.002	Sites and Areas of Significance to Māori	Oppose	We wish to advise that we oppose the establishment of SASM 68 -Paroa Lagoon in its current format. The mapping is incorrect and amendments are supported by Poutini Ngāi Tahu.	That the eastern boundary of the designated SASM68 be amended and realigned to the Paroa Lagoon waterway eastern edge. New large scale maps accurately showing this new boundary delineation be produced and supplied to all affected parties for approval.
P. Faith Quinn (S266)	S266.003	Sites and Areas of Significance to Māori Rules	Amend	The RMA states that because SASM are considered a type of historic heritage, rules associated with them have legal effect from the time the proposed TTPP was notified. This is totally rejected by the affected private landowners, who are submitting and requesting that these rules be withdrawn from the private properties identified.	That any of the proposed references, rules, or conditions, placed on any private property fronting the state highway be withdrawn immediately.

P. Faith Quinn (S266)	S266.004	Sites and Areas of Significance to Māori Rules	Oppose		Any Rules with immediate effect be withdrawn from the currently effected private properties.
Phil and Helen Cook (S600)	S600.001	Whole plan	Support	Recognising the importance of farming, quarrying and mining to the West Coast.	Retain provisions providing for farming, quarrying and mining to the West Coast.
Phil and Helen Cook (S600)	S600.002	Rural Zones	Support	Providing for mineral extraction in zones across the West Coast.	Support provisions that provide for mineral extraction in zones.
Phil and Helen Cook (S600)	S600.003	Open Space and Recreation Zones	Support	Providing for mineral extraction in zones across the West Coast.	Support provisions that provide for mineral extraction in zones.
Phil and Helen Cook (S600)	S600.004	Mineral Extraction Zone	Support		Retain
Phil and Helen Cook (S600)	S600.005	Rezoning Requests	Amend	Rezoning parcels to Mineral extraction zone	Seciton 2 SO 11712, Section 3 SO11712, Lot 1 DP 315, Pt Lot 2 DP 315 be rezoned to Mineral Extraction Zone.
Phoenix Minerals Limited (S606)	S606.001	Whole plan	Neutral	To enable alternative relief which may give effect to the matters	Alternative, consequential, or necessary additional relief to give effect to the matters raised generally in this submission.
Phoenix Minerals Limited (S606)	S606.002	Description of the Districts	Support	Highlights the strong history of mining, and current reliance on mining.	Retain as notified.

Phoenix Minerals Limited (S606)	S606.003	Mineral Extraction Zone	Amend	Enable those activities as appropriate for mineral extraction.	Amend the explanation of the Mineral Extraction Zone as follows: Areas where mineral extraction and ancillary activities are enabled and expected to be the predominant use.
Phoenix Minerals Limited (S606)	S606.004	Definitions	Amend	consistency with the 2019 National Planning Standards.	Insert PRIMARY PRODUCTION definition as follows: " means: a. any aquaculture, agricultural, pastoral, horticultural, mining, quarrying or forestry activities; and b. includes initial processing, as an ancillary activity, of commodities that result from the listed activities in a); c. includes any land and buildings used for the production of the commodities from a) and used for the initial processing of the commodities in b); but d. excludes further processing of those commodities into a different product. "
Phoenix Minerals Limited (S606)	S606.005	Earthworks	Oppose in part	Definition of earthworks would currently capture minerals extraction, exploration and prospecting.	Amend the definition of earthworks to exclude minerals extraction prospecting and exploration, as follows: " means the alteration or disturbance of land, ...); but excludes gardening, cultivation, mineral prospecting, mineral extraction, mineral exploration and disturbance of land for the installation of fenceposts."
Phoenix Minerals Limited (S606)	S606.006	FUNCTIONAL NEED	Support	Supports the inclusion of the National Planning Standards definition of functional need	Retain as notified.
Phoenix Minerals	S606.007	INDUSTRIAL ACTIVITY	Support	Supports the inclusion of the definition of industrial activity	Retain as notified.

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Phoenix Minerals Limited (S606)	S606.008	MINERAL EXPLORATION	Amend	The definition should provide for ancillary activities	Amend to read: has the same meaning as in the Crown Minerals Act 1991 (as set out below) ... includes any drilling, dredging or excavations (whether surface or subsurface) and any ancillary activities that are reasonably necessary to determine the nature and size of a mineral deposit.
Phoenix Minerals Limited (S606)	S606.009	MINERAL EXTRACTION	Amend	Seeks the inclusion of indigenous vegetation clearance/vegetation clearance.	... and includes ancillary activities such as earthworks, indigenous vegetation clearance/vegetation clearance , landscaping and rehabilitation works ...
Phoenix Minerals Limited (S606)	S606.010	MINERAL PROSPECTING	Amend	the definition should provide for ancillary activities which are reasonably necessary to occur	Amend to read: has the same meaning as in the Crown Minerals Act 1991 (as set out below) ... iii. Taking samples by hand or hand held methods; and iv. Taking small samples offshore by low-impact mechanical methods; and v. ancillary activities reasonably necessary to identify land likely to contain mineral deposits or occurrences.
Phoenix Minerals Limited (S606)	S606.011	OPERATIONAL NEED	Support	Gives effect to the National Planning Standards	Retain as notified.
Phoenix Minerals Limited (S606)	S606.012	Strategic Directions Overview	Support	All other objectives and policies to be consistent with the strategic directions	Retain as notified.

Phoenix Minerals Limited (S606)	S606.013	MIN - O1	Support	Recognises mining, seeks to avoid duplication of regulation	Retain as notified.
Phoenix Minerals Limited (S606)	S606.014	MIN - O2	Support	To give effect to the Regional Policy Statement	Retain as notified.
Phoenix Minerals Limited (S606)	S606.015	MIN - O3	Support	Recognises that minerals only occur in certain locations	Retain as notified.
Phoenix Minerals Limited (S606)	S606.016	MIN - O4	Amend	There is concern about the use of the word "existing"	Amend the objective as follows: "To ensure that new subdivision, use and development does not compromise existing mineral extraction activities, including through reverse sensitivity to effects such as dust, noise and traffic generation."
Phoenix Minerals Limited (S606)	S606.018	MIN - O6	Support	Provides for the effects to be avoided, remedied or mitigated.	Retain as notified.
Phoenix Minerals Limited (S606)	S606.019	NENV - O3	Amend	Should also recognise the fixed-in-location nature of minerals extraction	Amend NENV - O3 as follows: "To recognise: a. The substantial contribution to the protection of natural environment values that is made by the existence of public conservation land in protecting significant areas, habitats and features; b. The functional and operational need for infrastructure and mineral

					extraction activities to sometimes be located in significant areas; and c. 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.
Phoenix Minerals Limited (S606)	S606.020	NENV - O4	Oppose in part	This objective is directive.	Amend NENV - O4 as follows: "To clearly identify: a. Unique and important natural environment areas and features on the West Coast/Te Tai o Poutini which require a greater degree of protection must be protected ; and b. Areas where subdivision, use and development to enable community economic, cultural and social wellbeing can be sustainably managed."
Phoenix Minerals Limited (S606)	S606.021	POU - P10	Amend	This objective is directive, and there are examples of minerals extraction within sites and areas of significance to Maori that have previously obtained resource consent. It is considered that the objective should seek consideration of the values and significance and management of potential adverse effects on the values of the site or area of significance, rather than seek absolute protection of the site.	Amend POU - P10 as follows: Protect Manage adverse effects on Poutini Ngāi Tahu taonga and cultural sites, including sites and areas of significance to Māori identified in Schedule Three while ensuring Poutini Ngāi Tahu's key role in decision making around their management.
Phoenix Minerals Limited (S606)	S606.022	Ecosystems and Indigenous Biodiversity Objectives	Amend	Recognise that vast tracts of land are protected public conservation land.	Include an additional objective into Ecosystems and Indigenous Biodiversity as follows: "When considering resource consent applications which have effects on ecosystems and indigenous biodiversity,

					have regard to the protection afforded to other similar ecosystems and indigenous biodiversity within public conservation land."
Phoenix Minerals Limited (S606)	S606.023	ECO- O2	Support	This objective supports mineral extraction where values can be maintained.	Retain as notified.
Phoenix Minerals Limited (S606)	S606.024	ECO- O4	Support	Supports the maintenance of the range and diversity of ecosystems	Retain as notified.
Phoenix Minerals Limited (S606)	S606.025	ECO - P2	Amend	Recognise that activities may also have an operational need to locate	Amend ECO - P2 as follows: "Allow activities within areas of significant indigenous vegetation or significant habitats of indigenous fauna where: a. This is for a lawfully established activity; or b. It is for a Poutini Ngāi Tahu cultural purpose; or c. This is undertaken on Poutini Ngāi Tahu or Te Rūnanga o Ngāi Tahu land in accordance with an Iwi/Papatipu Rūnanga Management Plan; or d. The activity has a functional or oprational need to be located in the area; e. The activity has no more than minor adverse effects on the significant indigenous vegetation or fauna habitat."
Phoenix Minerals Limited (S606)	S606.026	ECO - P3	Support	Minerals extraction activities often provide the ability for restoration and rehabilitation	Retain subsections b and c as notified.

Phoenix Minerals Limited (S606)	S606.027	ECO - P6	Amend	Inconsistent with the West Coast Regional Policy Statement	<p>Amend : When assessing consents for subdivision, use and development, avoid activities shall be designed and undertaken in a way that does not: which will:</p> <ul style="list-style-type: none">a. Prevent an indigenous species or community being able to persist in their habitats within their natural range in the Ecological District;b. Result in a degradation of the threat status, further measurable loss of indigenous cover (with the exception of Manuka and Kanuka) or disruption to ecological processes, functions or connections in land environments in category one or two of the Threatened Environment Classification at the Ecological District level; and ...
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Phoenix Minerals Limited (S606)	S606.028	ECO - P9	Support	Recognises the need to provide for offsetting or compensation	Retain
Phoenix Minerals Limited (S606)	S606.030	ECO - R1	Support	Rule provides for a number of vegetation clearance activities	Retain as notified.
Phoenix Minerals Limited (S606)	S606.031	ECO - R2	Oppose	This rule contains a very restrictive vegetation clearance requirement	Delete ECO - R2, or alternatively amend to set a higher vegetation clearance activity, such as 2,000m2 and allow any activity (not just residential, network utility, tracks etc) to carry out limited clearance works.
Phoenix Minerals Limited (S606)	S606.033	ECO - R7	Support	Activity status is supported	Retain as notified.
Phoenix Minerals Limited (S606)	S606.034	NC - O1	Support	Provides for activities to occur	Retain as notified.
Phoenix Minerals Limited (S606)	S606.035	NC - O3	Amend	Recognise that some activities also have an operational need to locate	Amend NC - O3: To provide for activities which have a functional or operational need to locate in the margins of lakes, rivers and wetlands in such a way that the impacts on natural character are minimised.
Phoenix Minerals	S606.036	NC - P2	Amend	To provide for these activities which also have a functional or operational need to occur	Amend NC - P2 as follows: Provide for indigenous vegetation removal, minerals extraction, exploration and prospecting activities and earthworks within

Limited (S606)					riparian margins of lakes, rivers and wetlands where significant adverse effects on natural character are minimised as far as practicable and:
Phoenix Minerals Limited (S606)	S606.037	NC - P3	Amend	To recognise that some activities also have an operational need to locate	Amend: Indigenous Vegetation Clearance and Earthworks excluding minerals extraction, exploration and prospecting activities , not meeting the Permitted Activity Rules Activity Status Discretionary

Phoenix Minerals Limited (S606)	S606.038	NC - R3	Amend	This rule would apply to minerals extraction, exploration and prospecting	Alternatively, amend the definition of earthworks to specifically exclude minerals extraction, exploration and prospecting activities so that these rules do not apply to these activities.
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Phoenix Minerals Limited (S606)	S606.039	SUB - S1	Amend	Too small to be an economic farming unit, and too large for the lifestyle block market.	Reduce the minimum allotment size to 5,000m2
Phoenix Minerals Limited (S606)	S606.040	EW - O1	Support	Seeks for minerals extraction, exploration and prospecting activities to be excluded from the definition of earthworks.	Retain as notified.
Phoenix Minerals Limited (S606)	S606.041	EW - P1	Amend	Should enable all earthworks, instead of just temporary or small scale earthworks.	Amend EW - P1 as follows: 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.
Phoenix Minerals Limited (S606)	S606.042	EW - R1	Amend	Spreading of vegetative matter is provided for	Amend EW - R1 as follows: All Permitted activities must comply with the following relevant standards.; All fill must consist of cleanfill material, but may also include vegetative matter used on and sourced from the same site, for the purposes of fill;
Phoenix Minerals Limited (S606)	S606.043	EW - R2	Amend	This rule would apply to minerals extraction, exploration and prospecting	Amend EW - R2 as follows: EW - R2 Earthworks excluding minerals extraction, exploration and prospecting activities - All Zones
Phoenix Minerals Limited (S606)	S606.044	EW - R4	Amend	This rule would apply to minerals extraction, exploration and prospecting	Amend EW - R4 as follows: Earthworks excluding minerals extraction, exploration and prospecting activities in the GRUZ - General Rural Zone, RLZ - Rural Lifestyle Zone, any INZ - Industrial Zone, FUZ - Future Urban Zone, AIRPZ - Airport Zone, any OSRZ - Open

					Space and Recreation Zone and the MPZ - Māori Purpose Zone
Phoenix Minerals Limited (S606)	S606.045	EW - R6	Oppose	Control over earthworks separately is not considered necessary	Delete EW - R6
Phoenix Minerals Limited (S606)	S606.046	EW - R8	Amend	This rule would apply to extraction, exploration and prospecting	Amend EW - R8 as follows: EW - R8 Earthworks excluding minerals extraction, exploration and prospecting activities in any Zone not meeting Permitted Activity standards
Phoenix Minerals Limited (S606)	S606.047	LIGHT - O2	Amend	There are only certain areas where there is a need to protect the night sky,	Amend LIGHT - O2 as follows: Artificial outdoor lighting is located, designed and operated to maintain the character and amenity values within zones, so that it does not adversely affect the health and safety of people, the safe operation of the transport network, protects views of the night sky , the habitats and ecosystems of nocturnal native fauna and the species themselves.
Phoenix Minerals Limited (S606)	S606.048	LIGHT - P1	Oppose in part	The wording is inconsistent	Amend LIGHT - P1 as follows: Provide for the use of artificial outdoor lighting that: a. Allows people and communities to enjoy and use sites and facilities during night time hours and contributes to the security and safety of private and public spaces; b. Maintains the character and amenity values of the zone and surrounding area; c. Supports the social, cultural, and economic wellbeing or health and safety of people and communities, including road safety; d. Minimises sky

					glow and light spill; and e. Protects Minimises the adverse effects on the health and well-being of people and ecosystems.
Phoenix Minerals Limited (S606)	S606.049	LIGHT - P2	Oppose in part	It is not always necessary to protect these views and doing so could affect operational requirements.	Amend LIGHT - P2 as follows: Control the intensity, location and direction of any artificial outdoor lighting to: a. Ensure that any artificial outdoor lighting avoids conflict with existing light sensitive areas and uses; b. Internalise light spill within the site where the outdoor lighting is located; c. Minimises adverse effects on views of the night sky and intrinsically dark landscapes including in areas of outstanding coastal natural character;
Phoenix Minerals Limited (S606)	S606.050	LIGHT - R1	Oppose	Requires the discretion of the relevant territorial authority	Delete LIGHT - R1
Phoenix Minerals Limited (S606)	S606.051	LIGHT - R2	Amend	Particularly restrictive Lux limit for lighting after 10pm	Amend LIGHT - R2 as follows: Where: 1. Outdoor artificial lighting must not exceed the following vertical or horizontal light levels: a. 7.00am – 10.00pm: 25 Lux; b. 10.00pm – 7.00am: 10 Lux in the PORTZ - Port Zone, and MINZ - Mineral Extraction Zone ; and c. ...
Phoenix Minerals Limited (S606)	S606.052	LIGHT - R4	Oppose in part	This rule introduces a very stringent lux limit for night time lighting	Amend LIGHT - R4 as follows: Where: 1. Outdoor artificial lighting must not exceed the following vertical or horizontal light levels: a. 7.00am – 10.00pm: 10 Lux; and b. 10.00pm – 7.00am: 2 Lux;

Phoenix Minerals Limited (S606)	S606.053	Rezoning Requests	Oppose	Open Space Zone over rural public conservation land is not considered necessary.	In the Planning Maps, replace the Open Space Zones with General Rural Zone on rural public conservation land, except where the submitter has sought a Mineral Extraction Zone .
Phoenix Minerals Limited (S606)	S606.054	Open Space and Recreation Zones	Support	Appropriately enabling the use and development of minerals	Retain the following wording: "The nature of the West Coast, with its extensive mineral deposits, combined with 84% of the land area being located in public conservation estate, means that provision is also made for mineral extraction within the Open Space Zone."
Phoenix Minerals Limited (S606)	S606.055	OSRZ - P9	Amend	insufficiently enables such extraction to the extent recognised by the RPS	Amend OSRZ - P9: Provide for the range of purposes where compatible with the open space values including: a....; f. Mineral extraction, exploration and prospecting of resources where there is a functional or operational need to locate there these are limited in their location ; and g. Water supply and drainage networks where this supports local community needs.
Phoenix Minerals Limited (S606)	S606.056	OSRZ - P14	Amend	Contains duplication of both wording and regulation.	Amend OSRZ - P14: Provide for mineral extraction activities within the OSZ - Open Space Zone where: a. Impacts on open space and recreation values of the site are minimised; b. This is provided for within any Open Space Management Plan for the area; c. ...
Phoenix Minerals Limited (S606)	S606.057	OSZ - R20	Support	Activity status is considered appropriate	Retain as notified.

Phoenix Minerals Limited (S606)	S606.058	OSZ - R22	Support	Activity status is considered appropriate	Retain as notified.
Phoenix Minerals Limited (S606)	S606.059	RURZ - O1	Support in part	Fails to be enabling of activities in the rural zones	Amend RURZ - O1 as follows: "To provide for a range of activities, uses and developments, including primary production , that maintain the amenity and rural character values of the rural environment, while retaining highly productive land for and rural activities, and supporting a productive rural working environment."
Phoenix Minerals Limited (S606)	S606.060	RURZ - O5	Support in part	Many mineral extraction activities occur outside of minerals extraction zones	Amend RURZ - O5 as follows: To support provide for the use and extraction of mineral resources located within the rural environment, recognising that mineral resources are widespread, and that provided adverse effects are minimised and rehabilitation of land occurs following mineral extraction, mineral extraction can be appropriate in a range of locations.
Phoenix Minerals Limited (S606)	S606.061	RURZ - P1	Support	Supports a wide range of activities	Retain as notified.
Phoenix Minerals Limited (S606)	S606.062	RURZ - P3	Support in part	Effects extend to all primary production activities and should therefore be applied to all of those	Amend RURZ - P3 as follows: Expansion of existing settlements beyond current boundaries should support the existing character and amenity of the settlement and avoid areas of high hazard risk, high

					natural or Poutini Ngāi Tahu cultural values, or significant agricultural primary production values.
Phoenix Minerals Limited (S606)	S606.063	RURZ - P15	Support	Provides for management of reverse sensitivity	Retain as notified.
Phoenix Minerals Limited (S606)	S606.064	RURZ - P18	Support in part	Should include the full effects management hierarchy	Amend RURZ - P18 as follows: Recognise that mineral resources are fixed in location and enable mineral extraction activities provided adverse effects are avoided, remedied, or mitigated, offset or compensated for .
Phoenix Minerals Limited (S606)	S606.065	RURZ - P19	Amend	Amendments for consistency	Amend RURZ - P19 as follows: Manage conflicts between mineral extraction activities and other land uses by ensuring that: a. Standards to manage adverse effects minimise impacts on the amenity, rural character and natural values of rural areas are met; and b. Activities that are incompatible with the effects of mineral extraction activities are not established close to existing mineral extraction activities.
Phoenix Minerals Limited (S606)	S606.066	RURZ - P21	Support	Requires the provision of adequate information to assess effects	Retain as notified.
Phoenix Minerals Limited (S606)	S606.067	RURZ - P22	Support	Requires rehabilitation of land following mineral extraction	Retain as notified.

Phoenix Minerals Limited (S606)	S606.068	RURZ - P23	Support	Supports co-ordination which will avoid duplication	Retain as notified.
Phoenix Minerals Limited (S606)	S606.069	RURZ - P24	Support	Supports the creation of Minerals Extraction Zones	Retain as notified.
Phoenix Minerals Limited (S606)	S606.070	RURZ - P25	Support in part	Does not reflect the full effects management hierarchy	Amend RURZ - P25 as follows: RURZ - P25 Maintain the quality of the environment and amenity of areas surrounding the mineral extraction activities as far as practicable by: a. ... d. Avoiding or mitigating impacts Managing adverse effects on significant indigenous vegetation and significant habitats of indigenous fauna;
Phoenix Minerals Limited (S606)	S606.071	GRUZ - R11	Support	Provides for minerals exploration and prospecting	Retain as notified.
Phoenix Minerals Limited (S606)	S606.072	GRUZ - R12	Support	Provides for minerals extraction	Retain as notified.
Phoenix Minerals Limited (S606)	S606.073	GRUZ - R24	Oppose	Unclear what is sought to be controlled by this rule	Delete GRUZ - R24

Phoenix Minerals Limited (S606)	S606.074	GRUZ - R25	Support in part	In order to be consistent with GRUZ-R11, this rule should apply to minerals prospecting and exploration also. The West Coast Regional Policy Statement seeks to achieve integrated management, which includes avoiding unnecessary duplication of resource management responsibilities, which including water quality as a matter of discretion in this rule would not achieve.	Amend GRUS - R25: GRUZ - R25 Mineral Extraction, Prospecting and Exploration Activities not meeting Permitted or Controlled Activity Standards ... Discretion is restricted to: a. ... k. Effects on riparian margins and water quality ;
Phoenix Minerals Limited (S606)	S606.075	GRUZ - R32	Oppose	If amendments are made as in GRUZ-R25, then this rule becomes superfluous	Delete GRUZ-32.
Phoenix Minerals Limited (S606)	S606.076	Rezoning Requests	Amend	The submitter has minerals permits over areas at Callaghans and Kumara/Greenstone	Include additional areas at Callaghans and Greenstone/Kumara as shown in Attachments A and B of the submission.
Phoenix Minerals Limited (S606)	S606.077	MINZ - O1	Support	Enables mineral extraction activities in the MINZ and is supported	Retain as notified.
Phoenix Minerals	S606.078	MINZ - O2	Amend	To allow for the full effects management hierarchy.	Amend MINZ - O2 as follows: To ensure exploration, extraction and processing of minerals within the MINZ

Limited (S606)					- Mineral Extraction Zone minimises manages adverse effects on
Phoenix Minerals Limited (S606)	S606.079	MINZ - P1	Support	Encourages the recognition of important mineral resources	Retain as notified.
Phoenix Minerals Limited (S606)	S606.080	MINZ - P2	Support	Recognises the need to protect mineral resources from reverse sensitivity effects	Retain as notified.
Phoenix Minerals Limited (S606)	S606.081	MINZ - P3	Amend	Best practicable environmental outcome rather than best practice.	Amend MINZ - P3 as follows: To ensure that after mineral extraction, all mine sites in the MINZ - Mineral Extraction Zone are rehabilitated to the best practicable practice environmental standards and to provide for future use and activities appropriate to the area.
Phoenix Minerals Limited (S606)	S606.082	MINZ - P4	Amend	To allow for the full effects management hierarchy.	Amend MINZ - P4 as follows: Maintain the quality of the environment, landscape, ecological values, character and amenity of the areas surrounding the MINZ - Mineral Extraction Zone as far as practicable by: a. Utilising management, monitoring, rehabilitation and mine closure plans as a key tool; b. Managing dust, noise, vibration, access and lighting to maintain amenity values; c. Managing traffic generation, load type and vehicle characteristics on the operation and maintenance of the transport network; d. Managing adverse effects impacts on significant

					indigenous vegetation and significant habitats of indigenous fauna;
Phoenix Minerals Limited (S606)	S606.083	MINZ - P5	Support	Recourse to rules for indigenous vegetation and SASM are not required.	Retain
Phoenix Minerals Limited (S606)	S606.084	MINZ - P6	Support	Effectively manage the relationship between the MINZ and SNA/SASM	Retain
Phoenix Minerals Limited (S606)	S606.085	MINZ - P7	Support in part	To allow for the full effects management hierarchy.	Amend: Maintain the quality of the environment, landscape, ecological values, character and amenity of the areas surrounding the MINZ - Mineral Extraction Zone as far as practicable by: a. ... d. Managing adverse effects impacts on significant indigenous vegetation and significant habitats of indigenous fauna;
Phoenix Minerals Limited (S606)	S606.086	MINZ - P8	Support	Provides for adverse effects to be managed	Retain as notified.
Phoenix Minerals Limited (S606)	S606.087	MINZ - R2	Amend	It is unclear why this rule is required	An additional advice note is sought as follows: " This rule does not override the protection of consented activities under Section 9(3)(a) of the Resource Management Act 1991 or existing use rights provided for under Section 10 of the Act. "

Phoenix Minerals Limited (S606)	S606.088	MINZ - R3	Support	This rule provides for ancillary activities	Retain as notified.
Phoenix Minerals Limited (S606)	S606.089	MINZ - R6	Support	The activity status for vegetation clearance is supported.	Retain as notified.
Phoenix Minerals Limited (S606)	S606.090	MINZ - R7	Support	The activity status for mineral extraction activities is supported	Retain as notified.
Phoenix Minerals Limited (S606)	S606.091	Outline of Content Requirements for a Mineral Extraction Management Plan	Oppose in part	Presented in a confusing manner, and not all matters listed in the outline may be required	Amend Outline of Content Requirements for a Mineral Extraction Management Plan as follows: 1. Introduction i. ... 3. Management of Environmental Effects i. Terrestrial Ecology (address all that are relevant) a. Native vegetation b. Native fauna c. Significant natural areas d. Key species e. Key risks to be managed f. Any specific species or ecosystem management plans ii. Landscape values and Amenity (address all that are relevant) a. Landscape values b. Neighbouring landuses iii. Management of hazardous substances iv. Acid mine management v. Dust vi. Noise vii. Erosion and Sediment Control viii. Traffic ix. Lighting x. Archaeological and cultural values xi. Weed and pest management xii. Site rehabilitation and mine closure Appendices: Specific Management Plans (if required) 4. Key issues to be managed i. Heritage and

					<p>Culture (address all that are relevant) a. Any archaeological or historic heritage values b. Poutini Ngāi Tahu Cultural landscape values ii. Acid Mine Drainage Management (where relevant) a. Prevention and minimisation measures b. Treatment and Control measures c. Monitoring, maintenance and contingency programme iii. Erosion and Sediment Control a. Drawings and specifications of erosion control measures b. Sizing and location of sediment controls (eg diversions, silt fences etc) c. Management of sediment retention ponds (where relevant) d. Decommissioning of sediment control structures e. Chemical treatment programme for sediment laden water (where relevant) f. Monitoring, maintenance and contingency programme iv. Waste Rock/Overburden Management a. Waste rock placement methods and procedures b. Slope stability c. Monitoring and maintenance 5. Specific Management Plans i. Hazardous Substances & Spill Contingency Management Plan ii. Dust Management Plan iii. Noise Management Plan iv. Traffic Management Plan v. Lighting Management Plan vi. Fire Management Plan vii. Archaeological Management Plan viii. Annual Monitoring Plan ix. Site Rehabilitation Management Plan x. Weed and Pest Management Plan xi. Mine Closure Plan</p>
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Phoenix Minerals Limited (S606)	S606.093	ECO - R5	Amend	add a matter on the functional and/or operational need of the activity	Include functional and operational need in ECO - P7 as per relief sought above, and/or amend ECO - R5 as follows: Discretion is restricted to: a. ...; and i. The functional or operational need for the activity to locate within the area where indigenous vegetation clearance is proposed to occur.
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Phoenix Minerals Limited (S606)	S606.094	ECO - P7	Amend	Should also recognise the fixed-in-location nature of minerals extraction	Amend ECO - P7 as follows: When assessing resource consents..., consider the following matters: a. ...; h. The functional or operational need for the activity to occur within areas of significant indigenous vegetation or significant habitats of indigenous fauna; and h i. ...
Phoenix Minerals Limited (S606)	S606.096	Rezoning Requests	Amend	Too small to be an economic farming unit, and too large for the lifestyle block market.	Rezone 148 Kumara Junction Highway to Settlement Zone - Rural Residential Precinct to allow subdivision to 4,000m2.
Pokei Lau (S232)	S232.001	Sites and Areas of Significance to Māori	Oppose	We wish to advise that we oppose the establishment of SASM 68 -Paroa Lagoon in its current format. The mapping is incorrect and	That the eastern boundary of the designated SASM68 be amended and realigned to the Paroa Lagoon waterway eastern edge. New large scale maps accurately showing this new boundary delineation be

				amendments are supported by Poutini Ngāi Tahu.	produced and supplied to all affected parties for approval.
Pokei Lau (S232)	S232.002	Sites and Areas of Significance to Māori Rules	Amend	Tthe RMA states that because SASM are considered a type of historic heritage, rules associated with them have legal effect from the time the proposed TTPP was notified.This is totally rejected by the affected private landowners, who are submitting and requesting that these rules be withdrawn from the private properties identified.	That any of the proposed references, rules, or conditions, placed on any private property fronting the state highway be withdrawn immediately. Any Rules with immediate effect be withdrawn from the currently effected private properties.
Project and Ventures (S348)	S348.001	Whole plan	Amend	Multiple points of issue in relation to various inclusions. We are a major Developer based in Nelson with numerous existing and past projects on the West Coast. This document in its current form will present major obstacles for future projects.	Total review of document with relation to legality and consequences of various provisions and inclusions.