



## Submitter Names: Q - S

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

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Queenstown Lakes District Council (S523)	S523.001	How The Plan Works	Cross Boundary Matters	Amend	<p>Part 1 of the Proposed Te Tai o Poutini Plan (the Plan) focuses on managing cross boundary issues associated with those West Coast territorial boundaries that it manages. It does not provide sufficient guidance for plan users concerning cross boundary issues that arise at the boundary of a territorial authority that is not managed by the Plan, such as that between Westland District and Queenstown Lakes District. It is considered appropriate that the Plan set out a clear procedure for resource management issues that arise at the boundary of another territorial authority that is not managed by the Plan.</p> <p>The recommended addition is consistent with the approach for managing such cross boundary resource management issues at 1.3.1 of Chapter 1 (Introduction) of the Queenstown Lakes District Proposed District Plan.</p>	<p>That the 'Cross Boundary Matters - Ngā Take Whakawhiti Rohenga' section of the Te Tai o Poutini Proposed Plan (<b>the Plan</b>) be amended to include the following wording in regard to cross boundary resource management issues: <b>Cross boundary issues on land that is not managed by the Te Tai o Poutini Plan</b> <b>Cross boundary issues refer to situations where an activity takes place on or near a territorial boundary or where the effects of a particular activity impact on the territory of an adjacent authority, including any territorial boundary that is not managed by the Te Tai o Poutini Plan.</b> <b>The following procedure will be followed for such cross boundary issues:</b></p> <ol style="list-style-type: none"><li><b>The consenting territorial authority will consider whether any resource consents are required from another territorial authority.</b></li><li><b>Reference to the provisions of the Resource Management Act (1991) that relate to joint hearings will be made where an activity requires consent from two or more territorial authorities;</b></li></ol>

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						<p>3. <b>Applicants for resource consent for activities which might have effects on an adjoining territory authority will be encouraged to consult with that authority.</b></p> <p><b>In the case of infrastructure networks crossing territorial boundaries, the consenting territorial authority will consult with other relevant territorial authorities and endeavour to arrive at a planning framework that provides a consistent approach to the network.</b></p>
Queenstown Lakes District Council (S523)	S523.002	Natural Open Space Zone	Overview	Amend	<p>Land managed by the Plan at the boundary between the Queenstown Lakes and Westland District's is predominately located within the proposed Open Space and Natural Open Space Zones.</p> <p>It is considered appropriate that the Plan set out a clear procedure for resource management issues that arise at the boundary of another territorial authority not managed by the Plan. In particular, it is noted that the Open Space Zone provides for a number of activities, such as mineral prospecting and extraction, that have the potential to give rise to adverse effects on land within the Queenstown Lakes District if cross boundary issues are not managed effectively.</p>	That an advice note be included within the Natural Open Space Zone highlighting that land included within these zones adjoin a number of other territorial authority boundaries not managed by the Plan, and that plan users need to apply care in regard to any potential cross boundary resource management issues.
Queenstown Lakes District Council (S523)	S523.003	Open Space Zone	OSZ - Open Space Zone Rules	Amend	<p>Land managed by the Plan at the boundary between the Queenstown Lakes and Westland District's is predominately located within the proposed Open Space and Natural Open Space Zones.</p> <p>It is considered appropriate that the</p>	That an advice note be included within the Open Space Zone highlighting that land included within these zones adjoin a number of other territorial authority boundaries not managed by the Plan, and that plan users need to apply care in regard to any potential

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					Plan set out a clear procedure for resource management issues that arise at the boundary of another territorial authority not managed by the Plan. In particular, it is noted that the Open Space Zone provides for a number of activities, such as mineral prospecting and extraction, that have the potential to give rise to adverse effects on land within the Queenstown Lakes District if cross boundary issues are not managed effectively	cross boundary resource management issues.
Queenstown Lakes District Council (S523)	S523.004	Planning Maps and Overlays	Sites and Ares of Significance to Māori	Amend	<p>It is noted that the location of Wāhi Tūpuna site 6 (Makarore &amp; Tiore Pātea) extends into the boundary of Westland District. While the provisions of the Queenstown Lakes District Proposed District Plan do not have any legal effect within the Westland District, it is noted that Tangata Whenua may have common interests between these boundaries that may be appropriate to take into account in the development of the Plan.</p> <p>The advice note would help to manage any cross boundary resource management issues that may come about in relation to Wāhi Tūpuna site 6 (Makarore &amp; Tiore Pātea).</p>	<p>That Wāhi Tūpuna site 6 (Makarore &amp; Tiore Pātea) described within Chapter 39 of the Queenstown Lakes Proposed District Plan be taken into account in developing the schedule of sites significant to Māori, including its extent in the location shown in the map included with the submission, as well as the values identified within provision 39.6 of Chapter 39 (Wāhi Tūpuna) of QLDCs PDP.</p> <p>And, That an advice note be included within the relevant part of the Plan to ensure plan users and administrators are made aware of any issues that may arise from the location, extent and values associated with Wāhi Tūpuna site 6 (Makarore &amp; Tiore Pātea).</p>
Queenstown Lakes District Council (S523)	S523.005	Open Space Zone	OSZ - R11	Not Stated	Provision OSZ-R11 provides for Mineral Prospecting and Mineral Exploration as a permitted activity, subject to standards. Provision OSZ-R19 specifies that some Mineral Prospecting and Mineral Exploration (including Mineral Extraction) are provided for as Restricted Discretionary activities, in particular if they are not located in or on an Outstanding Natural Landscape or	That clarification is provided as to the intent of provisions OSZ-R11 in regard to Mineral Prospecting and Mineral Exploration when located in or on Outstanding Natural Landscapes or Outstanding Natural Features.

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					<p>Outstanding Natural Feature. However, it is not clear if it is intended that these activities also be excluded from the permitted activity status in OSZ-R11 if they are located in or on Outstanding Natural Landscapes or Outstanding Natural Features.</p> <p>Queenstown Lakes District Council has an interest in the intent of these provisions on account of potential cross boundary issues that could arise on land within the Queenstown Lakes District.</p>	
Queenstown Lakes District Council (S523)	S523.006	Open Space Zone	OSZ - R19	Not Stated	<p>Provision OSZ-R11 provides for Mineral Prospecting and Mineral Exploration as a permitted activity, subject to standards. Provision OSZ-R19 specifies that some Mineral Prospecting and Mineral Exploration (including Mineral Extraction) are provided for as Restricted Discretionary activities, in particular if they are not located in or on an Outstanding Natural Landscape or Outstanding Natural Feature. However, it is not clear if it is intended that these activities also be excluded from the permitted activity status in OSZ-R11 if they are located in or on Outstanding Natural Landscapes or Outstanding Natural Features.</p> <p>Queenstown Lakes District Council has an interest in the intent of these provisions on account of potential cross boundary issues that could arise on land within the Queenstown Lakes District.</p>	That clarification is provided as to the intent of provisions OSZ-R19 in regard to Mineral Prospecting and Mineral Exploration when located in or on Outstanding Natural Landscapes or Outstanding Natural Features.
Radio New Zealand (S476)	S476.001	Interpretation	CRITICAL INFRA-STRUCTURE	Amend		RNZ support a definition of "critical infrastructure" that is important in the case of an emergency.

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						<p>However, RNZ seek that radiocommunication networks are also recognised. As explained above, RNZ's facilities serve a vital civil defence role alongside other activities contemplated in the definition.</p> <p>The definition of "regionally significant infrastructure" in the West Coast Regional Policy Statement (RPS) includes reference in subclause (i) to telecommunications and radio communications facilities. The Proposed Plan definition of critical infrastructure should reflect the definition contained in the RPS.</p> <p>Amend as follows:  "means the rail network, state highways, special purpose roads, airports, wastewater, reticulated water and stormwater plants, defence facilities, telecommunications and radiocommunications networks and electricity generation, transmission and distribution assets"</p>
Radio New Zealand (S476)	S476.002	Interpretation	LAWFULLY ESTABLISHED	Support		RNZ support the definition provided its relief below for the definition of "lawfully established" is accepted.
Radio New Zealand (S476)	S476.003	Interpretation	HEIGHT	Support		Retain definition of "height" as notified.
Radio New Zealand (S476)	S476.004	Interpretation	INFRA-STRUCTURE	Support		Retain definition of "infrastructure" as notified.
Radio New Zealand (S476)	S476.005	Interpretation	LAWFULLY ESTABLISHED	Amend		<p>RNZ support the definition of lawfully established but consider that specific recognition of activities established and permitted by way of designation is appropriate.</p> <p>Amend the definition as follows:  means activities permitted through a rule in a plan, a resource consent, a national environmental standard, <b>a designation</b>, or by an existing use right (as provided for in Section 10</p>

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						of the RMA). In the case of mineral extraction it also includes an activity permitted through a Coal Mining Licence issued under the Coal Mines Act (1979).
Radio New Zealand (S476)	S476.006	Interpretation	MAINTENANCE	Support		Retain definition of "maintenance" as notified.
Radio New Zealand (S476)	S476.007	Interpretation	NETWORK UTILITY OPERATOR	Support		Retain definition of "Network utility operator" as notified.
Radio New Zealand (S476)	S476.008	Interpretation	REVERSE SENSITIVITY	Support		Retain definition of "reverse sensitivity" as notified.
Radio New Zealand (S476)	S476.009	Interpretation	SENSITIVE ACTIVITY	Support		Retain definition of "sensitive activity" as notified.
Radio New Zealand (S476)	S476.010	Interpretation	STRUCTURE	Support		Retain definition of "structure" as notified.
Radio New Zealand (S476)	S476.011	Interpretation	UPGRADING	Support		Retain definition of "upgrading" as notified.
Radio New Zealand (S476)	S476.012	STRATEGIC DIRECTION	CR - O2	Support		Subject to RNZ's requested relief on the definition of "critical infrastructure", RNZ support this objective and seek that it is retained as notified.
Radio New Zealand (S476)	S476.013	STRATEGIC DIRECTION	UFD - O1	Support		Subject to RNZ's requested relief on the definition of "critical infrastructure", RNZ support this objective, particularly 8. It is important that infrastructure is protected from incompatible activities.
Radio New Zealand (S476)	S476.014	Infrastructure	INF - O1	Amend		RNZ support the direction that provides for the continued operation, maintenance and upgrading of existing infrastructure.
Radio New Zealand (S476)	S476.015	Infrastructure	INF - O2	Support		RNZ supports the objective to protect utilities and infrastructure from incompatible land use. RNZ consider the objective should also

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						specifically refer to reverse sensitivity effects.
Radio New Zealand (S476)	S476.016	Infrastructure	INF - O5	Support		RNZ supports this objective, in particular the recognition of technical, operation and functional needs of infrastructure and that it may have positive effects.
Radio New Zealand (S476)	S476.017	Infrastructure	INF - P1	Support		RNZ supports recognition of the benefits associated with infrastructure. RNZ considers the benefits of critical infrastructure to the region could be highlighted in this policy. Amend as follows: "Recognise and provide for the positive social, economic, cultural and environmental benefits from the development, continuing operation and upgrading of utilities and infrastructure, <b>in particular critical infrastructure.</b> "
Radio New Zealand (S476)	S476.018	Infrastructure	INF - P2	Support		RNZ supports this policy, particularly the recognition that locational, technical and operational constraints ought to be considered. Subject to RNZ's request relief on the definition of "critical infrastructure", RNZ consider the policy ought to specifically provide for the importance of critical infrastructure. Amend as follows: "Manage the design and location of utilities and infrastructure, including when sited in overlays in a way which considers: ... e. That positive effects of infrastructure, <b>in particular critical infrastructure</b> , may be realised locally, regionally, or nationally; and f..."

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Radio New Zealand (S476)	S476.019	Infrastructure	INF - P3	Amend		<p>RNZ support a policy that addresses reverse sensitivity effects.</p> <p>Subject to its relief on the definition of "critical infrastructure", RNZ seek that this is expressly included in the policy. Further, RNZ considers the policy wording should be strengthened to recognise the significant chilling effect reverse sensitivity can have on infrastructure, and the difficulty in addressing this effect once it arises.</p> <p>Amend as follows:  <del>Manage</del> <b>Avoid</b> reverse sensitivity effects from subdivision, use and development, on utilities and infrastructure, <b>in particular critical infrastructure</b>, to ensure their safe, secure and efficient operation."</p>
Radio New Zealand (S476)	S476.020	Infrastructure	INF - P6	Support		RNZ support this policy and seek that it is retained as notified.
Radio New Zealand (S476)	S476.021	Infrastructure	INF - R1	Support		<p>Although RNZ's activities are authorised by designations, RNZ support a permitted activity standard for infrastructure.</p> <p>RNZ already comply with NZS 2772.1:1999 and support its inclusion in the Proposed Plan.</p>
Radio New Zealand (S476)	S476.022	Infrastructure	INF - R4	Support		<p>Although RNZ's activities are authorised by designations, RNZ support a permitted activity rule for temporary network activities in the event RNZ needs to temporarily undertake activities not authorised by the designation.</p>
Radio New Zealand (S476)	S476.023	Infrastructure	INF - R7	Support		RNZ supports a permitted activity status for works to lines, etc. by Network Utility Operators.
Radio New Zealand (S476)	S476.024	Infrastructure	INF - R26	Support		RNZ supports this rule.



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Radio New Zealand (S476)	S476.025	Infrastructure	INF - R27	Support		RNZ support discretionary activity status for temporary network activities where permitted activity standards are not met.
Radio New Zealand (S476)	S476.026	Infrastructure	INF - R28	Support		RNZ support non-complying activity status for infrastructure that does not comply with permitted activity standards. RNZ already complies with standards that relate to Radio Frequency Fields and support their inclusion in the Proposed Plan.
Radio New Zealand (S476)	S476.027	Open Space and Recreation Zones	OSRZ - O1	Support		RNZ support this objective. The maintenance of an open space environment, and consideration of the surrounding environment, will reduce the potential for activities to be established that conflict with infrastructure such as RNZ's Facilities that are located in the Open Space Zone. Retain OSRZ-O1 as notified.
Radio New Zealand (S476)	S476.028	Open Space and Recreation Zones	OSRZ - O2	Support		RNZ support recognition of the values and purpose of open space on the West Coast. Limiting development in the OSZ will have the ancillary benefit of reducing the risk of incompatible activities near RNZ's Facilities. Retain OSRZ-O2 as notified.
Radio New Zealand (S476)	S476.029	Open Space and Recreation Zones	OSRZ - P2	Support		RNZ support a policy to recognise that open space may accommodate certain activities where they fit with the purpose of open space.
Radio New Zealand (S476)	S476.030	Open Space and Recreation Zones	OSRZ - P3	Support		RNZ support the direction for buildings and structures to be compatible with the predominant purpose of open space and amenity of the surrounding area. Retain OSRZ-P3 as notified.

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Radio New Zealand (S476)	S476.031	Open Space and Recreation Zones	OSRZ - P11	Support		RNZ support a policy to primarily provide for recreation and community activities while limiting associated structures. Retain OSRZ-P11 as notified.
Radio New Zealand (S476)	S476.032	Open Space and Recreation Zones	OSRZ - P12	Support		RNZ support the direction to enable activities that are consistent with the purpose of open space and minimise the effects on the surrounding area. Retain OSRZ-P12 as notified.
Radio New Zealand (S476)	S476.033	Open Space Zone	OSZ - R1	Support in part		<p>RNZ generally supports the proposed rules, which limit development in the OSZ to those activities closely associated with relevant recreation and conservation activities. As stated in the body of the submission above, RNZ's concern is that the potential for safety risks arising from the construction of tall structures near RNZ's Facilities. This risk can be readily addressed with proper construction techniques and safety measures.</p> <p>RNZ supports the requirement for all permitted activities to comply with the OSZ-R1 standards, but considers the additional activity standard below is appropriate. Notification to RNZ of any applications for tall structures within 1,000m will ensure safety risks to the applicant. RNZ is happy to consider alternative wording or rules structures that achieve similar outcomes.</p> <p>Amend as follows:  <b>...If any proposed structure within 1,000m of Radio New Zealand's Facilities at Cape Foulwind would be taller than 18m, the safety risks of electromagnetic coupling must be considered and addressed effectively. RNZ should be considered an</b></p>

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						<b>affected person for the purposes of any consent application.</b>
Radio New Zealand (S476)	S476.034	Open Space Zone	OSZ - Open Space Zone Rules	Support		RNZ generally supports the proposed rules, which limit development in the OSZ to those activities closely associated with relevant recreation and conservation activities. RNZ supports the requirement for all permitted activities to comply with the OSZ-R1 standard, with the proposed amendment noted above.
Radio New Zealand (S476)	S476.035	Rural Zones	RURZ - O1	Support		RNZ support the direction to maintain the amenity and rural character values of the rural environment. Retain RURZ-O1 as notified.
Radio New Zealand (S476)	S476.036	Rural Zones	RURZ - P1	Support		RNZ support enablement of activities that maintain rural amenity and character. In particular, RNZ support the direction in c. that activities should be compatible with existing development and the surrounding area. Retain RURZ-P1 as notified.
Radio New Zealand (S476)	S476.037	Rural Zones	RURZ - P6	Support		RNZ support provision for certain activities where they maintain the character and amenity of the rural environment and where adverse effects can be managed. However, RNZ is concerned that this wording does not adequately recognise some of the limitations infrastructure providers face. Often rural areas are the only functional location for some infrastructure, although there may be no direct relationship with the surrounding rural land itself. Amend as follows: Recognise that the rural areas may be the most appropriate location for some utility, industrial or commercial uses to establish,

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						where these have a functional relationship with rural areas, provided the character and amenity of the rural areas is maintained and adverse effects are managed. <b>In particular, critical infrastructure may have a functional need to be located in rural areas in order to operate effectively.</b>
Radio New Zealand (S476)	S476.038	Rural Zones	RURZ - P16	Support		RNZ support the direction to maintain sufficient buffers from infrastructure to avoid reverse sensitivity effects. However, RNZ consider a specific reference to telecommunication / radio communication equipment is appropriate as this infrastructure often raises concerns for residents of new developments located nearby. Amend as follows: There should be sufficient buffers provided from infrastructure such as wastewater treatment plants and land disposal areas, transmission infrastructure, <del>and</del> water supply catchments <b>and telecommunication and radiocommunications infrastructure</b> , to avoid reverse sensitivity effects on the infrastructure.
Radio New Zealand (S476)	S476.039	Rural Zones	SETZ - PREC4 - P4	Support		RNZ support the policy to maintain rural character and amenity values within the Rural Residential Precinct. RNZ seek specific reference in the policy to avoid reverse sensitivity effects. Amend as follows: Subdivision, use and development within the SETZ - PREC4 - Rural Residential Precinct should maintain the predominant rural character and amenity values, which include: Low-density residential living and small scale rural activities; Open space and privacy around buildings;

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						and On-site servicing and a general absence of urban infrastructure. <b>Avoiding reverse sensitivity effects on rural activities and established infrastructure.</b>
Radio New Zealand (S476)	S476.040	General Rural Zone	GRUZ - R1	Amend		<p>RNZ support a permitted activity status for buildings that comply with standards and a discretionary status for activities that do not. As stated in the body of the submission above, RNZ's concern is that the potential for safety risks arising from the construction of tall structures near RNZ's Facilities. This risk can be readily addressed with proper construction techniques and safety measures.</p> <p>As RNZ has the technical expertise and operational ability to assist applicants in ensuring the risk of EMR coupling is addressed, RNZ seeks the below text is added as an Advice Note. Notification to RNZ of any applications for tall structures within 1,000m will ensure safety risks to the applicant. RNZ is happy to consider alternative wording or rules structures that achieve similar outcomes.</p> <p><b>Advice Note:If any proposed structure within 1,000m of Radio New Zealand's Facilities at Cape Foulwind would be taller than 18m, the safety risks of electromagnetic coupling must be considered and addressed effectively. RNZ should be considered an affected person for the purposes of any such consent application.</b></p>
Radio New Zealand (S476)	S476.041	General Rural Zone	GRUZ - R1	Amend		RNZ support a permitted activity status for buildings that comply with standards and a discretionary status for activities that do not.

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						<p>As stated in the body of the submission above, RNZ's concern is that the potential for safety risks arising from the construction of tall structures near RNZ's Facilities. This risk can be readily addressed with proper construction techniques and safety measures.</p> <p>As RNZ has the technical expertise and operational ability to assist applicants in ensuring the risk of EMR coupling is addressed, RNZ seeks the below text is added to the Advice Note. Notification to RNZ of any applications for tall structures within 1,000m will ensure safety risks to the applicant. RNZ is happy to consider alternative wording or rules structures that achieve similar outcomes.</p> <p><b>Advice Note:If any proposed structure within 1,000m of Radio New Zealand's Facilities at Cape Foulwind would be taller than 18m, the safety risks of electromagnetic coupling must be considered and addressed effectively. RNZ should be considered an affected person for the purposes of any such consent application.</b></p>
Radio New Zealand (S476)	S476.042	Settlement Zone	SETZ - R2	Amend		<p>RNZ support a permitted activity status for buildings that comply with standards and a discretionary status for activities that do not.</p> <p>As stated in the body of the submission above, RNZ's concern is that the potential for safety risks arising from the construction of tall structures near RNZ's Facilities. This risk can be readily addressed with proper construction techniques and safety measures.</p> <p>As RNZ has the technical expertise and operational ability to assist applicants in ensuring the risk of EMR coupling is</p>

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						<p>addressed, RNZ seeks the below text is added to the Advice Note. Notification to RNZ of any applications for tall structures within 1,000m will ensure safety risks to the applicant. RNZ is happy to consider alternative wording or rules structures that achieve similar outcomes.</p> <p>Advice Note:</p> <p>...</p> <p>...</p> <p><b>If any proposed structure within 1,000m of Radio New Zealand's Facilities at Cape Foulwind would be taller than 18m, the safety risks of electromagnetic coupling must be considered and addressed effectively. RNZ should be considered an affected person for the purposes of any such consent application.</b></p>
Radio New Zealand (S476)	S476.043	DESIGNATION S	Radio New Zealand Limited Designations	Support		<p>RNZ support the Proposed Plan's description of its designation at Cape Foulwind but observe that the Proposed Plan maps do not show RNZ1. The lack of mapping of RNZ's designation has been something of an ongoing issue, and RNZ considers the preparation of the Te Tai o Poutini Plan provides the appropriate opportunity to resolve this issue.</p> <p>If council files do not record the geographic extent of the designation, RNZ is happy to engage with Council officers and provide information to ensure the designation is accurately mapped. RNZ seek that the planning maps be amended so that RNZ1 is clearly identified in blue outline as indicated by the proposed map legend below [See original submission for details]:</p>

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Radio New Zealand (S476)	S476.044	Infrastructure	Infrastructure Objectives	Amend	Due to its integral civil defence role, RNZ considers the Proposed Plan needs to provide greater recognition and protection of RNZ's Facilities.	<p>The Proposed Plan should provide appropriate objectives that better recognise:</p> <ul style="list-style-type: none"> <li>• The critical contribution that infrastructure and network utility operations (such as RNZ's Facilities) make to the social, economic and cultural wellbeing of the district, as well as health and safety;</li> <li>• The technical and operational constraints that limit the geographic location in which network utilities in general, and RNZ's Facilities in particular, can operate, particularly in relation to land use, subdivision and development; and</li> <li>• The need to avoid "reverse sensitivity" effects on network utilities for the benefit of the community.</li> </ul>
Radio New Zealand (S476)	S476.045	Infrastructure	Infrastructure Policies	Amend		<p>The Proposed Plan should provide appropriate policies that better recognise:</p> <ul style="list-style-type: none"> <li>• The critical contribution that infrastructure and network utility operations (such as RNZ's Facilities) make to the social, economic and cultural wellbeing of the district, as well as health and safety;</li> <li>• The technical and operational constraints that limit the geographic location in which network utilities in general, and RNZ's Facilities in particular, can operate, particularly in relation to land use, subdivision and development; and</li> <li>• The need to avoid "reverse sensitivity" effects on network utilities for the benefit of the community.</li> </ul>



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Raylene Black (S305)	S305.001	Planning Maps and Overlays	Outstanding Natural Character	Oppose	Data collected from up out dated maps and not enough information to make these decisions.	Remove outstanding coastal natural character areas over the property at the southern end of Hannah's Clearing settlement.
Raylene Black (S305)	S305.002	Planning Maps and Overlays	Natural Features and Landscapes	Oppose	Data collected from up out dated maps and not enough information to make these decisions.	Remove outstanding natural landscape overlay from property at southern Hannah's Clearing
Raylene Black (S420)	S420.001	Natural Features and Landscapes	Natural Features and Landscapes	Amend	Negative impact on property values. Only property in the neighborhood being included in the overlays.	Request property at 1976b Haast Jackson Bay Road to be removed from Outstanding Natural Character and Outstanding Natural Landscapes overlays.
Raylene Black (S420)	S420.002	Natural Hazards	Coastal Severe and Coastal Alert Overlay	Amend		Request to remove property from Coastal Hazard Severe Overlay.
Raylene Black (S420)	S420.003	Whole Plan	Whole plan	Amend		The proposed plan is not easily read or interpreted by the lay person as there are too many overlays/chapters.
Rebecca Inwood (S422)	S422.001	Ecosystems and Indigenous Biodiversity	Permitted Activities	Oppose	While I support the permitted activity rules for indigenous vegetation clearance in the Buller District, I am concerned that there is no permitted provision once SNAs are identified and scheduled. The rules framework needs to be reviewed.	Review the rules framework so that when SNAs are identified and scheduled in Buller there remain Permitted Activity provisions.
Rebecca Inwood (S422)	S422.002	Planning Maps and Overlays	Planning Maps and Overlays	Amend	I am concerned with the extend of various overlays and whether the boundaries are defined accurately and the potential for land use restrictions that are not warranted.	The extent of overlays should be re-assessed.
Rebecca Inwood (S422)	S422.003	Whole Plan	Whole plan	Amend	I suggest a 'usability check' if the Plan is completed. The rules framework needs to be both concise and understandable by all users.	Undertake a "usability check" for the final Plan.

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Rebecca Inwood (S422)	S422.004	Planning Maps and Overlays	Planning Maps and Overlays	Amend	I am concerned with the extend of various overlays and whether the boundaries are defined accurately and the potential for land use restrictions that are not warranted	The extent of overlays should be re-assessed.
Rebecca Inwood (S422)	S422.005	Planning Maps and Overlays	Planning Maps and Overlays	Amend	I am concerned with the extend of various overlays and whether the boundaries are defined accurately and the potential for land use restrictions that are not warranted	The extent of overlays should be re-assessed.
Reuben Lane (S272)	S272.001	Whole Plan	Whole plan	Oppose	I have read and do not understand the proposed Te Tai o Poutini plan. This proposal seems to contain errors and has not followed due process. As a native of this country and someone who would be directly effected by the proposal i can say that this plan, as it stands threatens my existing use, rights, and enjoyments of my own land.	Withdraw the Plan. Ensure my existing use rights are retained.
Rex & Julie MacDonald (S229)	S229.001	Planning Maps and Overlays	Sites and Ares of Significance to Māori	Oppose	SASM 68 - PAROA LAGOON - oppose in current format. We do not oppose the recognition of the actual Paroa Lagoon as being a traditional Matinga Kai (food and other natural resource gathering area) and Ara Tawhito (Traditional Travel route) site. The delineated on the initial maps and consequent changes is not acceptable to us in the current form. We understand that the errors have occurred between the original mapping by Ngai Tahu GIS consultants and the Councils GIS mapping consultants because the two systems used were incompatible and hence incorrect boundaries were produced as a result. The original ellipsoid produced as a result of this mapping system error	Amend the mapping of SASM 68 so that the eastern most boundary be the existing channels eastern waters edge which is readily definable from photographs or GPS data gathering

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					shows the area of interest overlapping many freehold properties along the east side of the State Highway through the settlement of Gladstone. This designation could cause potential loss in property and sales values and additional consent costs in the future if this plan goes ahead in its current format. The original intention of Poutini Ngai Tahu was to include only the waterway and immediate coastal area therefore not to intrude on private property nor place any planning rules across any properties.	
Rex & Julie MacDonald (S229)	S229.002	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori Rules	Amend	It is also noted that the RMA states that because SASM are considered a type of historic heritage, rules associated with them have legal effect from the time the proposed TTPP was notified. This is 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.
Rex & Julie MacDonald (S229)	S229.003	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori Rules	Oppose		That any rules with immediate effect be withdrawn from the currently affected private landowners
Rex MacDonald (S106)	S106.001	SCHED 3: SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 68	Amend	It has been publicly stated that local IWI did not want to impinge upon private property. SASM68 would adversely effect the LIM report of the property. No evidence of sites of significance to Maori. The correction of the maps has removed properties located in the area, so the properties along the front should all be completely removed as well.	Eastern boundary of SASM68 be moved to the western side of Main South Road, Gladstone, to exclude all private property on eastern side of highway.

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Rex Scott (S25)	S25.001	SCHED 3: SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 108	Oppose	Not comfortable with the ad on site of significant to Maori. Oppose SASM109 on property.	Remove SASM 109 from property.
Riarnne Klempel (S67)	S67.001	SCHED4 - SCHEDULE OF SIGNIFICANT NATURAL AREAS	PUN - 049	Support	It is the last remaining stand of Kahikatea forest on the entire Barrytown flats, after the earlier dredge mining and recent farming developments and dairy conversion. Greater recognition and protection is needed.	I support this area staying as an sna, and would like to see this last remaining stand of Kahikatea properly fenced off from cattle.
Riarnne Klempel (S67)	S67.002	Planning Maps and Overlays	Open Space Zone	Support in part	One continuous strip of open space zone would allow for an excellent amenity for the community and visitors.	The areas of open space zoning which have been put in place along the coast of the Barrytown flats (running alongside the the beach), should be extended to the entire length of Pakiroa Beach (the Barrytown flats beach).
Riarnne Klempel (S67)	S67.003	Planning Maps and Overlays	Rezoning Requests	Amend	Extend OSZ into NOSZ is to exclude mineral extraction from delicate environmental areas. Particularly along the hills behind the barrytown flats where historical sluice gold mining has destabilized the mountains toes and ridges. This historical mining activity has resulted in condemned dwellings and rural residential land on the east side of the highway being unsafe for residential development.	I support this type of zoning, and would like to see more of the open space zoning put into this Natural open space zoning, particularly around the Punakaiki and Barrytown flats areas.
Riarnne Klempel (S67)	S67.004	Planning Maps and Overlays	Rezoning Requests	Amend	The entire Barrytown Flats area is too delicate an environment for large scale industry, such as the mining that would be enabled with MINZ here. This area is being rapidly populated and the Punakiaki area, just kms away, is one of the most visited in New Zealand . MINZ zoning would allow for hazardous chemicals to be bought into this	Rezone the MINZ on the Barrytown flats. The land highest above sea level should be rezoned rural lifestyle or general rural zone. The lower lying land should be rezoned open space or natural open space.

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					delicate area and blasting in an already unstable area. It would drive young families who live adjacent to this zone, from the area and inhibit growth in our community. The geography is low lying, it is important to the natural environment that water quality remains high, and the steep hills behind are known for sound intensification and reverberation.	
Riarnne Klempel (S67)	S67.005	General Rural Zone	GRUZ - R1	Amend	Better planning and regulation is needed so that intensive farming operations, with large areas of land, can be assisted to make better decisions on where to build the relevant infrastructure. Example of Calf rearing facility at Barrytown being located 20m from cemetery as a place where negative effects have resulted from its location.	Intensive farming operations should not be able to locate near to cemeteries.
Riarnne Klempel (S67)	S67.006	Planning Maps and Overlays	Rezoning Requests	Amend	This property meets the criteria of rural residential.	Please rezone 64 Cargill Rd in Barrytown as Rural Residential
Riarnne Klempel (S67)	S67.007	Planning Maps and Overlays	Rezoning Requests	Support	There is no current allowance in the ttp for more residential settlement zoning on the Barrytown flats area. There are no empty houses and only 1 section for sale. . Greater planning for residential is needed in this area. Rural residential and settlement zoning returns higher rates to the council than general rural zoning. Punakaiki village will need to retreat from sea level and the middle and southern end of the Barrytown flats should be considered for expanding settlement. The TTPP is allowing rural residential on the east side of the highway, but the hills behind	Provide for more residential development around the Barrytown village

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					are unstable, making the land dangerous for dwellings. What is proposed is creating ribbon residential development, which should be minimized.	
Riarnne Klempel (S67)	S67.008	General Rural Zone	GRUZ - R12	Oppose	All mining needs to be done with great regulation. So much irreversible environmental harm and negative outcomes for community have been caused by poor industrial practices on the westcoast. Returning little benefit and great harm to the westcoast. Mining, industry and council must perform better if they seek to benefit our community.	All mining activity should be discretionary and restricted. Not a permitted activity
Riarnne Klempel (S67)	S67.009	Planning Maps and Overlays	Rezoning Requests	Amend	This area is at sea level, with a high water table (at ground level). This area was developed as a subdivision, which has failed. This area is unsuitable for dwellings, any building here is a risk of inundation from the sea and would require expensive protection. It would be of great benefit to all if this land was established as a wetland park for conservation, walking and cycling.	Remove lot 8 legal description 361177, 0 state highway 6 Barrytown, from rural lifestyle zone.
Riarnne Klempel (S67)	S67.010	Rural Zones	RURZ - P7	Support	As for RURZ P2	Apply this successfully to Barrytown
Riarnne Klempel (S67)	S67.011	Rural Zones	RURZ - P3	Support	As for RURZ P2	Apply this successfully to Barrytown
Riarnne Klempel (S296)	S296.001	Planning Maps and Overlays	Rezoning Requests	Amend	Barrytown has outgrown itself and requires surrounding area for expansion. Barrytown is an increasing popular small coastal rural settlement but suffers from being overlooked by council and planners. We have one congested main road (cargills) with inadequate parking for the school and community hall. The intersection to the highway is increasingly dangerous,	Rezone land to expand the Barrytown township settlement area

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					road drains are unfinished. Conflict from lack of planning in development exists between farm and settlement. TTPP is the opportunity to address these issues, but it appears to be overlooked again.	
Riarnne Klempel (S296)	S296.002	General Rural Zone	GRUZ - R12	Oppose	The ttp is too permissive of all large-scale industry. In the ttp mining is a permitted activity in the General rural zone "Permitted activities do not require resource consent, provided standards and all other relevant rules are met". This is unacceptable. Please create greater provisions and definitions in the ttp for regulation of large-scale industry.	Remove GRUZ - R12 Permitted Activity for mineral extraction.
Riarnne Klempel (S296)	S296.003	General Rural Zone	Permitted Activities	Amend	Please create greater provisions and definitions for regulation of large-scale industry. Consider every large-scale proposal on a case-by-case basis. The plan must have a clear definition of what large scale industry is. Whether it's a huge hotel being built in a delicate area at sea level (like Punakaiki), a 500+ herd dairy farm, or open cast mine. Permitted large scale industry is causing harm to the environment and people, which cannot be mitigated or remedied. [refer submission for detailed examples]	Ensure greater regulation of large-scale industry.
Riarnne Klempel (S296)	S296.004	Mineral Extraction Zone	Rules	Oppose	Create greater provisions and definitions for regulation of large-scale industry including mineral extraction. Consider every large-scale proposal on a case-by-case basis. Mineral extraction is causing harm to the environment and people, which cannot be mitigated or remedied. [refer submission for detailed examples]	Create greater provisions and definitions for regulation of large-scale industry including mineral extraction. Consider every large-scale proposal on a case-by-case basis.

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Riarnne Klempel (S296)	S296.005	Natural Environment Values	Natural Environment Values	Amend	<p>Please consider protection for all old growth forest on the Westcoast. I submit to have this carbon valued and counted and income earned, it's a renewable earner over a much longer time frame than mining or dairying. A means to assess the volume of such carbon and to move to return an economic value to landowners for the value of all carbon sinks, or to have the crown recognise the value of the carbon it can retain or increase within its land holdings.</p> <p>Carbon has a value and a cost, the value of retaining carbon needs to be included in the TTPP plan and a means to do so identified and promoted.</p> <p>The per ton value of this carbon can only increase into the near future, why are we not farming the natural resource and value that this provides in a less damaging and more sustainable way. Native forest and wetlands sequester far more carbon than land comparatively denuded for agriculture, mining or urban development.</p> <p>Biodiversity is necessary to maintain a healthy ecosystem and hence a better forest sequestration of carbon.</p>	Protect all old growth forest on the Westcoast and provide for their value as carbon sinks.
Riarnne Klempel (S296)	S296.006	Coastal Environment	Coastal Environment	Amend	Please consider policy 11,12,13,14,15 and 17 in the New Zealand coastal policy statement.	Amend the plan to consider policy 11,12,13,14,15 and 17 in the New Zealand coastal policy statement.
Riarnne Klempel (S296)	S296.007	Planning Maps and Overlays	High Natural Character	Support	Natural qualities are clearly evident in the dune landform, wind-swept vegetation cover and their relationship with the Tasman Sea contribute to the feeling of naturalness.	Retain NCA41 Pakiroa Beach



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Richard Arlidge (S419)	S419.001	Introduction	Description of the Districts	Amend	To understand Te Tai Poutini/West Coast one needs to understand the geography and geology of this landscape. [refer submission to detail on history and geography of the West Coast]	Amend Introduction to more fully discuss the history and geography of the West Coast as outlined in the submission.
Richard Arlidge (S419)	S419.002	Mineral Extraction Zone	MINZ	Oppose	Mining should only continue where this is to support a low carbon future.	Why not make all the West Coast a mineral extraction zone? Let those who wish to dig do it in a carbon neutral and low impact manual way. Change the rules to encourage the manual method of gold mining and for the extraction of other minerals.
Richard Arlidge (S419)	S419.003	Introduction	Description of the Districts	Amend	The towns and settlements of Karamea, Ngakawau/Granity, Westport, Carters Beach, Punakaiki, Rapahoe, Greymouth and Hokitika are all highly vulnerable to the impact of sea level rise. We are facing the possibility of two metres of sea level rise by the end of this century.	Page 8 "Reefton is Tai o Poutini's only inland town". The Proposed Plan should add that Rūnanga, Moana, Kumara and Blackball are all inland towns and these will all expand and evolve as the effects of sea level rise are felt in the coastal communities identified above.
Richard Arlidge (S419)	S419.004	Introduction	Description of the Districts	Amend	The majority of the daytime visitors to Punakaiki and the Pancake Rocks come via Greymouth. A large number of accommodation providers in Greymouth are in the tourism industry.	Page 9 The Grey District Add tourism to the description of the economy.
Richard Arlidge (S419)	S419.005	Rural Zones	Rural Zones - Objectives and Policies	Oppose in part	Over the past thirty plus years a large number of residents have moved into the rural environments and established their homes and lifestyles seeking a sense of place and a sense of space. This is one of the great assets of the West Coast and local authorities have gained valuable rates revenue from this trend. Over time the land use in some areas may change from large scale agricultural production to smaller scale horticultural and agricultural production. The more people resident in rural areas	Amend the rural zones objectives and policies to better reflect that these are significant residential locations and that agriculture and mineral extraction should not be prioritised over rural residential living.

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					is a positive development of the West Coast lifestyle.	
Richard Arlidge (S419)	S419.006	Appendix Three: Design Guidelines	Appendix Three: Design Guidelines	Amend	<p>The traditional heritage palette is a reflection of the limits of the colour palette of the last century and seeks to limit us to the resources discovered up to the 1920's. The more we have dug and mined the more minerals and colours we have discovered. The original colours were very limited and like all technology has evolved over time. The colonial era had typically two-toned colour schemes and often attempted to imitate stone. On the West Coast rusted corrugated iron is one of the most common vernacular of the human landscape and should be celebrated. In dryer parts of the country corrugated Iron remains silver but on the West Coast rust rules.</p>	<p>Develop a Tai o Poutini/West Coast indigenous colour palette could be developed from colours within the natural environment and landscape. These could include:</p> <p>Whites:• Southern alps snow white• Clematis• Glacier blue-white - blue ice• Kotuku (White heron) Reds:• Rust • Lichen• Kākā beak flower• Sunset red• Torea (Oystercatcher) Beak• Tarapunga (Red billed gull) red• Kanono berry red• Karamu berry red• Nikau flower red Oranges:• Porokaiwhiri (Pigeonwood) seed orange • Sunset orange Blues:• Distant mountain blue • Clear sky sunny day blue • Poroporo flower dark blue Greens:• Every shade of green as observed in the natural landscape Greys:• Every shade of cloud from off white through grey to matt black. • Heron grey Yellows:• Gorse flower gold• Gold nugget• Sunset gold Browns:• Mawhera river in full flood• Dead punga leaf brown Blacks:• Shag black• Torea (Oyster catcher) black• Tāiko (Westland Petrel) black• Tui black with white hints• Makomako (Wineberry) berry black</p>
Richard Cairney (S56)	S56.001	SCHED 3: SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	Amend	<p>I have owned the property at 61 Marsden Road Greymouth for 38 Years. The proposed Tai Poutini Plan has identified my property as being within SASM65 Eruaerua Moana Lagoon, which is listed as being of significance as a mahinga kai site. I am not opposed to the identification of sites of significance to Maori or the plan's overall objectives and policies.</p>	<p>I request that all sites of significance to Maori identified on private residential properties in urban areas be removed from schedule 3 and all consequential amendments be made to the objectives, policies, rules and planning maps or any other relief appropriate and necessary to give effect to my submission.</p>

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Richard Henschel (S285)	S285.001	Planning Maps and Overlays	Natural Hazards	Oppose in part	<p>We don't agree with the arbitrary and generalised mapping of natural hazards across the property. Without a proper survey or expert inspection, the property has been identified in its entirety, as being susceptible to coastal inundation. This has been done despite no historical evidence, as well as, during our 12 year ownership, never having been affected by coastal inundation or flooding across the most part of the land. (refer submission for more detail).</p> <p>We don't find the process of identifying for Flood hazard susceptibility and Coastal hazard alert being robust but rather, a 'worst case scenario' to mitigate risks. This impacts the usability, insurability, value of the property as well as the well-being of the owner of the property.</p> <p>The risk management proposed is also too extreme for a time scale that reflects only current knowledge of climate change and its mitigation.</p>	<b>Remove the Flood hazard susceptibility and the Coastal hazard alert category removed from the property at 4456B Karamea Highway or return this to the previously identified area adjacent to the highway.</b>
Richard Henschel (S285)	S285.002	Planning Maps and Overlays	Rezoning Requests	Oppose in part	<p>We don't agree that the property can be considered highly productive land. There is no record of it being used for horticulture or anything other than grazing livestock before being subdivided for lifestyle rural use. Being such a small property, grazing livestock is not a viable use of the land. The current flora doesn't indicate anything significantly productive about it either. Consequently we wish that Precinct category not be applied to this property.</p>	<b>Rezone</b> the property 4456B Karamea Highway from General Rural Zone - highly productive land precinct to Rural Lifestyle Zone.

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Richard Henschel (S285)	S285.003	Planning Maps and Overlays	High Natural Character	Oppose in part	We disagree with that 'Outstanding Coastal Natural Character and High Coastal Natural Character' designation being applied to this property. It is clear that this identification is a result of a section of the property having been previously erroneously designated as Schedule 2 wetland. [refer to submission for more detail]	Remove the High Coastal Natural Character' overlay from 4456B Karamea Highway.
Richard Henschel (S285)	S285.004	Natural Hazards	Natural Hazards	Oppose in part	In general we agree that there is a need for Te Tai o Poutini Plan but disagree on: the extreme level of risk management proposed; the lack of inclusion of likely future planning changes due to ongoing scientific assessment of risk also due to climate change; and central government action; the lack of specificity in identification of risk/s across individual property titles; and how it affects the property and ourselves as occupiers and kaitiaki of the property 4456B Karamea Highway Karamea.	Provide more scientifically robust proposals with regards to natural hazards. Take a less extreme approach to managing risk rather than this 'worst case scenario', generalised planning. We would like to see a more measured and measurable approach to the hazard planning for individual properties.
Richard Herring (S16)	S16.001	Residential Zones	Residential Zones	Amend	The air quality in Kaniere is poor during the winter. I feel it is time that the rules about ultra low emission burners were strengthened on the west coast. People are burning coal and other low quality fuels. You can't open a window at night in Kaniere. You can not walk around outside in comfort. The smoke then proceeds down over Hokitika, and out to sea. This situation of air quality needs to be addressed and quality needs to be monitored.	Address air quality issues at Kaniere with rules around low emission wood burners.
Richard Lowe (S351)	S351.001	Planning Maps and Overlays	Natural Hazards	Oppose	I am opposed to the flood modeling that has been presented for Karamea In the past 20 plus years various river protection works have been successful	I am opposed to the Karamea flood modeling that has been presented

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					in preventing major flood issues. unfortunately the smaller issues have not been addressed / remedied. The most concerning aspect of the presented modeling is it directly jeopardizes peoples financial assets and well being which will have an immediate flow down effect. if such a submission is implemented then both BDC & WCRC rates would Need to be reduced by a large percentage amount thus also reducing insurance premiums. the town folk and small business's in the Karamea and market cross areas cannot support unfounded proposals/submissions that are currently proposed	
Richard Wallis (S97)	S97.001	Planning Maps and Overlays	Natural Hazards	Oppose in part	Despite our building platforms being unaffected by the 100 year flooding in the recent 20 years that we have owned the above properties,the majority of our building platforms have been zoned Red(Coastal severe Hazard).These building platforms were built to the approved elevation by the Westland District Council.	Remove Severe Coastal Hazard Overlay from 59 Cuttance, Okuru and replace with Coastal Hazard Alert Overlay
Richard Wallis (S97)	S97.002	Planning Maps and Overlays	Natural Hazards	Amend	The surrounding land at Cuttance Okuru is existing subdivision land is identical to the land on the south and the forestry land east of the sections has been identified as Coastal Hazard Alert and it would make sense to include the shaded green area as per	Include the shaded green area as per the attached Diagram at Okuru to be Coastal Hazard Alert as well.

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					the attached Diagram to be Coastal Hazard Alert as well.	
Richard Wallis (S97)	S97.003	Natural Hazards	Natural Hazards	Amend	We would like to see Council create a guideline booklet for landowners to help negotiate and understand these changes. [more information in original submission]	Add a method into the Plan that sees the development of information for landowners about natural hazards and their management.
Rick Hayman (S471)	S471.001	Planning Maps and Overlays	Natural Hazards	Amend		Greater clarification/justification as to the extent of the flood hazard maps including an independent peer review of the work to ensure it is fit for purpose.
Rick Hayman (S471)	S471.002	Natural Hazards	NHR52	Amend	Properties are being built up to different heights reflecting the regulations at the time of consenting. Building consents approved recently are unlikely to meet the District Plan provisions which will create a peppered landscape of different heights across Westport.	Reconsider the heights in the rule and align these to reflect building consents that have been issued recently - which is lower
Rick Hayman (S471)	S471.003	Natural Hazards	NHR52	Amend		Confirm the timeframe and extent of construction of flood protection measures referred to within the rule.
Rick Hayman (S471)	S471.004	Planning Maps and Overlays	Natural Hazards	Amend	This will significantly lower the floor heights required for new builds.	That flood mapping is redone for when the flood walls are completed.
Rick Hayman (S471)	S471.005	Natural Hazards	NHR52	Amend	This will still provide a good level of protection for houses.	Amend the rules to refer to 1% AEP after the flood walls are constructed and require new buildings to have 300mm above this level.
Rick Hayman (S471)	S471.006	Natural Hazards	NHR52	Amend	The costs associated with technical reports for each individual landowner are huge.	Provide a simple mechanism to seek floor level heights or minimum building platform heights associated with subdivision, new home building and existing home modifications on a case-by-case basis that doesn't require expensive technical experts (eg Environment Canterbury approach).

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Rick Hayman (S471)	S471.007	General Residential Zone	GRZ - R1	Amend	A resource consent for infringing these rules will be required in most circumstances due to the heights required by the NH52 rule. This will often require written approval from neighbours with the risk of a hearing.	Provide relief from recession planes and setbacks where a site has to be built up due to NH52.
Ridgeline 3 Investments Limited (S127)	S127.001	Planning Maps and Overlays	Sites and Ares of Significance to Māori	Oppose	Title has been in private ownership since 1887 and consider has lawful unrestricted access to all minerals including pounamu	Remove pounamu management area from property at Arahura Valley (formerly Reserve 145 SO8749)
Ridgeline 3 Investments Limited (S127)	S127.002	SCHED 3: SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 116	Oppose	Title has been in private ownership since 1887 and is not in a statutory acknowledgement area. Has lawful unrestricted access to all minerals including pounamu.	Remove SASM 116/117/121 from subject property
Robert Burdekin (S378)	S378.001	Coastal Environment	Coastal Environment Rules	Neutral	I/we have concern that there is intent to implement restrictions on building, or land usage? If so what are they, and please provide full details of the proposed restrictions. The reason is that I/we want to understand the impact of this zoning on property covered by the TTPP.	Clarification of what the intent and anticipated outcome is for property identified as being in a "Coastal Environment" under the TTPP.
Robert Burdekin (S378)	S378.002	Whole Plan	Whole plan	Oppose	There was no mandate given by the people to develop a TTPP. The removal of district plans will negatively affect the smaller regions such as Buller and Westland with a larger focus on Greymouth. We need to retain local District Councils, this (the TTPP) is another step towards the removal of district councils by stealth.	Remove the requirement for the whole plan.
Robert Burdekin (S378)	S378.003	Natural Hazards	NHP5	Oppose	Concern that communities and people will be forced off their land for reasons determined by a government entity such as Council. NH-P5 talks about managed retreat, clearly there is an intent to force people off their property.	Provide be detail given around what managed retreat looks like and does the affected communities and individuals have a choice in this or is it forced removal that is being referred to.

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Robert Burdekin (S378)	S378.004	Natural Hazards	NHR38	Oppose	restricts existing users rights to extend their building.	NH-R38 point 1 restricts extending a current building, this should be removed.
Robert Burdekin (S378)	S378.005	Natural Hazards	NHR38	Oppose	Restricts property owners rights on their land.	NH-R38 point 2. b. & c. to be removed.
Robert Burdekin (S378)	S378.006	Natural Hazards	Natural Hazards	Oppose	Using a term such as "Coastal Hazard Severe" may negatively affect property values and their ability to gain insurance. Also, this has been used as a generic term without looking at what measure have been used to protect individual properties or communities.	the use of the term "Coastal Hazard Severe" to be removed.
Robert Burdekin (S378)	S378.007	Natural Hazards	NHR52	Oppose	1.0 m sea level rise is excessive given the predicted life of a new built house and the fact that that sort of sea level rise is speculation at best.	Westport Hazard Overlay 1m sea level rise to be reviewed. This should be no more than 0.5m
Robert Burdekin (S378)	S378.008	Appendix Three: Design Guidelines	Westport/Kawatiri Town Centre and Mixed Use Zone Urban Design Guidelines	Oppose	building owners should be able to determine their own colour of a building.	remove colour guidelines
Robert Fraser (S333)	S333.001	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori Rules	Amend		Request to clarify the rules.
Robert Scott (S380)	S380.001	SCHED 3: SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 151	Amend	Loosing the ability to farm this piece of land would severely impact our farm which currently supports 2 families.	Property RS1962 6565-6567 BLK V KARANGARUA SD 258100 0800 Reconsider SASM boundaries around this block of land which is productive farming land.
Robyn Langridge (S479)	S479.001	Whole Plan	Whole plan	Support	The document is hard to navigate as it brings 3 plans together and doesn't have an online search function. The content of the plan is insufficiently diverse and has had insufficient community process.	That the making of TTPP be paused until: 1. further search functions are created to make the document more easily searchable online 2. There is greater diversity in decision making to ensure the document is balanced.



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Rocky Mining Limited (S474)	S474.001	STRATEGIC DIRECTION	Mineral Extraction	Support	RML strongly supports the enablement of mineral extraction in the TTPP. RML is particularly supportive, and seeks to retain, the recognition of the history of mining on the Coast in the introductory sections, and the inclusion of mineral extraction strategic objectives that take precedence over other (non-strategic) objectives and require consideration in resource consent applications.	Retain mineral extraction strategic objectives and the priority placed on them in the plan
Rocky Mining Limited (S474)	S474.002	STRATEGIC DIRECTION	Connections and Resilience Strategic Objectives	Support	RML also support and seek to retain strategic objectives that recognise the importance of connections and resilience on the West Coast.	Retain as notified
Rocky Mining Limited (S474)	S474.003	Interpretation	FUNCTIONAL NEED	Support		Retain as notified
Rocky Mining Limited (S474)	S474.004	Interpretation	OPERATIONAL NEED	Support		Retain as notified
Rocky Mining Limited (S474)	S474.005	Natural Environment Values	Natural Environment Values	Amend	RML seek the retention and further recognition of mineral extraction's functional and operational need in all overlay chapters	Include a restricted discretionary rule in the overlay chapters for mineral extraction, or at minimum activities with a functional and operational need - discretion should be restricted to the values of the particular overlay.
Rocky Mining Limited (S474)	S474.006	Historic Heritage	Historic Heritage	Amend		Seek a restricted discretionary rule in the overlay chapters for mineral extraction, or at minimum activities with a functional and operational need - discretion should be restricted to the values of the particular overlay.
Rocky Mining Limited (S474)	S474.007	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori	Amend		Seek a restricted discretionary rule in the overlay chapters for mineral extraction, or at minimum activities with a functional and operational need - discretion should be restricted to the values of the particular overlay.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Rocky Mining Limited (S474)	S474.008	SCHED 3: SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	Amend	RML consider that it is appropriate for mana whenua to identify and define their Sites and Areas of Significance to Māori (SASM), and the Aotea and Pounamu Management Areas. RML consider that values associated with SASM should be expressly stated and carefully delineated so that applicants, such as RML will be in future, can ensure that their proposal are assessed for their effects on the specific values.	Provide more detailed information on the values associated with SASM.
Rocky Mining Limited (S474)	S474.009	Planning Maps and Overlays	Sites and Ares of Significance to Māori	Support	RML consider that it is appropriate for mana whenua to identify and define their Sites and Areas of Significance to Māori (SASM), and the Aotea and Pounamu Management Areas. RML consider that values associated with SASM should be expressly stated and carefully delineated so that applicants, such as RML will be in future, can ensure that their proposal are assessed for their effects on the specific values. RML support the notification to Poutini Ngāi Tahu of applications in those areas.	Provide more detailed/defined mapping of SASM.
Rocky Mining Limited (S474)	S474.010	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori Rules	Support	RML support the notification to Poutini Ngāi Tahu of applications in those areas.	Retain notification provisions to Poutini Ngāi Tahu in these rules.
Rocky Mining Limited (S474)	S474.011	Mineral Extraction Zone	Mineral Extraction Zone	Support	RML also strongly supports the introduction of the Mineral Extraction Zone (MEZ)	Retain the Mineral Extraction Zone
Rocky Mining Limited (S474)	S474.012	Planning Maps and Overlays	Rezoning Requests	Amend		That the MEZ apply across the full permit areas for the the Wombat Creek and Rimu Channel exploration permits
Rocky Mining Limited (S474)	S474.013	Mineral Extraction Zone	Mineral Extraction Zone	Support	RML support the provisions and rule framework of the MEZ,	Retain provisions as notified
Rocky Mining Limited (S474)	S474.014	General Rural Zone	GRUZ - R12	Support		Retain as notified

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Rocky Mining Limited (S474)	S474.015	General Rural Zone	GRUZ - R18	Support		Retain as notified
Rocky Mining Limited (S474)	S474.016	General Rural Zone	GRUZ - R25	Support		Retain as notified
Rocky Mining Limited (S474)	S474.017	General Rural Zone	GRUZ - R32	Support		Retain as notified
Rocky Mining Limited (S474)	S474.018	Rural Lifestyle Zone	RLZ - R11	Support		Retain as notified
Rocky Mining Limited (S474)	S474.019	Rural Lifestyle Zone	RLZ - R15	Support		Retain as notified
Rocky Mining Limited (S474)	S474.020	Open Space Zone	OSZ - R11	Support		Retain as notified
Rocky Mining Limited (S474)	S474.021	Open Space Zone	OSZ - R19	Support		Retain as notified
Rocky Mining Limited (S474)	S474.022	Noise	NOISE - R11	Support		Retain limits for the MEZ as notified
Rocky Mining Limited (S474)	S474.023	Transport	TRN - R6	Support		Retain heavy vehicle movement trigger as notified
Rocky Mining Limited (S474)	S474.024	Appendix One: Transport Performance Standards	TRNS14	Support		Retain as notified
Rocky Mining Limited (S474)	S474.025	Interpretation	MINERAL EXTRACTION	Amend		Include ancillary activities within the definition
Rocky Mining Limited (S474)	S474.026	Interpretation	MINERAL PROSPECTING	Amend		Include ancillary activities within the definition
Rocky Mining Limited (S474)	S474.027	Glossary	Glossary	Amend		Ensure all Māori terms used in Schedule 3 are included within the glossary
Rocky Mining Limited (S474)	S474.028	STRATEGIC DIRECTION	Connections and Resilience Strategic Objectives	Amend		Amend to include the critical role that transport infrastructure plays on the West Coast with regard to connection and resilience
Rocky Mining Limited (S474)	S474.029	Hazardous Substances	Hazardous Substances	Amend		Provide specific recognition of hazardous substance facilities associated with mining

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Rocky Mining Limited (S474)	S474.030	Transport	Transport	Amend		Seek recognition of the importance of efficient and effective use and operation of the transport network;
Rocky Mining Limited (S474)	S474.031	Transport	Transport Rules	Oppose in part		remove from the rules any assessment of amenity effects caused by use of the transport network
Rocky Mining Limited (S474)	S474.032	Natural Environment Values	Natural Environment Values	Amend		seek recognition within all overlay chapters that mineral extraction has a functional and operational need to locate where the resource is, and that this functional and operational need be given due consideration in resource consent applications within the specific overlay;
Rocky Mining Limited (S474)	S474.033	HCV - Historical and Cultural Values	HCV - Historical and Cultural Values	Amend		seek recognition within all overlay chapters that mineral extraction has a functional and operational need to locate where the resource is, and that this functional and operational need be given due consideration in resource consent applications within the specific overlay;
Rocky Mining Limited (S474)	S474.034	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori	Amend		seek recognition within all overlay chapters that mineral extraction has a functional and operational need to locate where the resource is, and that this functional and operational need be given due consideration in resource consent applications within the specific overlay;
Rocky Mining Limited (S474)	S474.035	Natural Environment Values	Natural Environment Values	Amend		seek that directive overlay provisions seeking to "avoid, protect, prevent" or "minimise, restrict and preserve" should be limited to situations where they are warranted (i.e. for significant adverse effects, or in environments meeting significance criteria (such as SASM or Significant Natural Areas)) because they

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						can be problematic for passing the gateway test;
Rocky Mining Limited (S474)	S474.036	HCV - Historical and Cultural Values	HCV - Historical and Cultural Values	Amend		seek that directive overlay provisions seeking to "avoid, protect, prevent" or "minimise, restrict and preserve" should be limited to situations where they are warranted (i.e. for significant adverse effects, or in environments meeting significance criteria (such as SASM or Significant Natural Areas)) because they can be problematic for passing the gateway test;
Rocky Mining Limited (S474)	S474.037	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori	Amend		seek that directive overlay provisions seeking to "avoid, protect, prevent" or "minimise, restrict and preserve" should be limited to situations where they are warranted (i.e. for significant adverse effects, or in environments meeting significance criteria (such as SASM or Significant Natural Areas)) because they can be problematic for passing the gateway test;
Rocky Mining Limited (S474)	S474.038	Sites and Areas of Significance to Māori	SASM - P11	Oppose		removal of any presumptions that mineral extraction automatically results in an adverse effect, including that found in SASM-P11;
Rocky Mining Limited (S474)	S474.039	Natural Environment Values	Natural Environment Values	Amend		overlay chapters contain a restricted discretionary rule for mining, with discretion restricted to effects on the specific overlay or overlay values;
Rocky Mining Limited (S474)	S474.040	HCV - Historical and Cultural Values	HCV - Historical and Cultural Values	Amend		seek that overlay chapters contain a restricted discretionary rule for mining, with discretion restricted to effects on the specific overlay or overlay values;
Rocky Mining Limited (S474)	S474.041	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori	Amend		overlay chapters, including the SASM and Management Area overlays, contain a restricted discretionary rule for mining, with discretion restricted to effects on the specific

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						overlay or overlay values;
Rocky Mining Limited (S474)	S474.042	Sites and Areas of Significance to Māori	SASM -R7	Oppose in part		deletion of the written approval trigger in SASM-R7
Rocky Mining Limited (S474)	S474.043	Subdivision	Subdivision	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;
Rocky Mining Limited (S474)	S474.044	Rural Zones	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;
Rocky Mining Limited (S474)	S474.045	Mineral Extraction Zone	Overview	Amend		that the overlays do not apply to the MEZ zoning
Rocky Mining Limited (S474)	S474.046	Planning Maps and Overlays	Rezoning Requests	Amend		application of the MEZ across permits EP60567, EP60761 and EPA60880 (refer to submission for maps)
Rocky Mining Limited (S474)	S474.047	Mineral Extraction Zone	Permitted Activities	Amend		that rural activities are provided for as a permitted activity in the MEZ
Rocky Mining Limited (S474)	S474.048	Earthworks	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;
Rocky Mining Limited (S474)	S474.049	Light	Permitted Activities	Amend		amend so that appropriate Lux limits are applied in the Mineral Extraction, Open Space and Rural zones
Rocky Mining Limited (S474)	S474.050	Noise	Permitted Activities	Amend		that the noise provisions are amended so that the weekend/public holiday hours in the General Rural Zone and Open Space Zone

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						are the same as the weekday hours, being 7:00am to 10:00pm
Rocky Mining Limited (S474)	S474.051	SCHED 3: SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	Amend		that sites and areas of significance reviewed for accuracy by mana whenua to ensure significance, and that the relevant significance values are included in Schedule 3
Rodney & Wendy Henham (S243)	S243.002	Planning Maps and Overlays	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.
Rodney & Wendy Henham (S243)	S243.003	Sites and Areas of Significance to Māori	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.	Any Rules with immediate effect be withdrawn from the currently effected private properties.
Rodney & Wendy Henham (S243)	S243.004	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori Rules	Support		That any of the proposed references, rules, or conditions, placed on any private property fronting the state highway be withdrawn immediately.
Rodney Wright (S62)	S62.001	Sites and Areas of Significance to Māori	SASM -R4	Oppose	{SASM 197 Okuru; SASM - R4 Indigenous vegetation clearance}  This rule should not be valid on the parcels of freehold land affected. Major effects on Haast farming community, affects the mental health and well-being of the community.  Oppose the immediate legal effect,	Amend the rule so only applies to Crown Leasehold or Māori Land and not freehold land.

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					should be changed to 'not effective' on freehold land and only affect Crown Leasehold or Maori land.	
Rodney Wright (S62)	S62.002	Planning Maps and Overlays	Sites and Areas of Significance to Māori	Amend	SASM should be identified correctly on the map and not with a random line.	Review boundary of SASM 197 (Okuru)
Rodney Wright (S62)	S62.003	SCHED 3: SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	Amend	Lack of evidence in the Haast area.	Clarify the reasons why some areas are identified as SASM.
Roger Ewer (S316)	S316.001	Planning Maps and Overlays	Rezoning Requests	Oppose	Mineral extraction should be regarded as a Discretionary activity on the Barrytown Flats to allow for local consultation and oversight	Remove the Mineral Extraction Zone at Barrytown and make mineral extraction a restricted discretionary activity.
Roger Ewer (S316)	S316.002	General Rural Zone	GRUZ - R12	Oppose	Having lived and worked as a builder on the Coast Road for 50 years increased heavy vehicle truck movements, noise, dust and other forms of pollution from the proposed sand mining will be seriously detrimental to me and to others who live here.	Remove GRUZ R12 and make mineral extraction a restricted discretionary activity in Rural zones
Roger Ewer (S316)	S316.003	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity Policies	Support	Indigenous biodiversity is becoming more important as global warming increases. Those of us who live by the sea are concerned about the Coast Road surviving without the threat of large scale sand mining changing the water table.	Retain ECO -P2
Roger Ewer (S316)	S316.004	Ecosystems and Indigenous Biodiversity	ECO - P3	Support		Retain ECO - P3 (b) & (e)
Roger Ewer (S316)	S316.005	Ecosystems and Indigenous Biodiversity	ECO - P4	Support		Retain ECO - P4



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Roger Ewer (S316)	S316.006	Ecosystems and Indigenous Biodiversity	ECO - P8	Support		Retain ECO - P8
Ronald Olsen (S130)	S130.001	SCHED 3: SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 63	Amend	Property located at 138 Preston Road, sold by the Mawhera Corporation some years ago. Old grave site situated over 100 meters away, the property should not be included in this area of significance.	To leave the property out of the proposed SASM 63.
Ronald Rodgers (S115)	S115.001	Planning Maps and Overlays	Rezoning Requests	Amend	Error acknowledged by Edith on 9 Sept 2022. Private land should not be zoned as an Open Space.	Rezone 31 Hans Bay Road, Lake Kaniere from Open Space Zone to Settlement Zone.
Rosalie Sampson (S539)	S539.001	Planning Maps and Overlays	Rezoning Requests	Amend	due to the proximity of a functioning settlement the underlying zoning is not inclusive of current and future demand for growth, if this zoning is to be continued for another 20 years, any further development of Karamea would require consent,	Rezone 4797 Karamea Highway and other land in immediate proximity (within 1km) of Karamea as Rural Lifestyle
Rosalie Sampson (S539)	S539.002	Planning Maps and Overlays	Rezoning Requests	Amend	the township of Karamea itself has been included with general rural zoning	Rezone the township of Karamea as Settlement Zone
Rosalie Sampson (S539)	S539.003	Planning Maps and Overlays	Rezoning Requests	Oppose	I am also upset that council has decided that areas of Karamea, inclusive of the township and built environment are part of the highly productive land which further restricts development, however this land is: a) Adjacent to a water body so any irrigation or fertilisation will leach into the waterway, which if this is the intent why not allow for upstream industrial activity... b) As mentioned above if this is highly productive land, modern farming techniques which are highly dependent upon chemicals are highly likely to be used, but the zoning also identifies this	Remove Highly Productive Land Precinct from land at Karamea

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					as a flood susceptible and coastal hazard area, which would elevate leaching and runoff so why would you want to protect farming in the area, which if anything would make for a more suitable town location, as it would maximise views and engineering methods can be adopted to mitigate the risk of natural hazards.	
Rosalie Sampson (S539)	S539.004	Planning Maps and Overlays	Natural Hazards	Oppose	I am also shocked at the flood modelling throughout Karamea, which while I note that there is an elevated rainfall in the area, this has not caused significant risk to the community. I also note that during subdivision particularly in areas such as Karamea a site suitability report is required which will include provisions for proper drainage which will not result in elevated stormwater flows beyond the boundary and that where this is not met	Remove flood overlays from Karamea
Rosalie Sampson (S539)	S539.005	Subdivision	Non-complying Activities	Amend	I would also note that in a number of these situations that s.106 of the RMA has more relevance than the above provisions and would allow for conditions of consent or considerations of similar standards in terms of raised height etc. Overall, I believe 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, where based on the preference of staff could stifle development through the township.	Amend non-complying activities for natural hazards to be restricted discretionary with a focus on hazard matters only.

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Rosalie Sampson (S539)	S539.006	Whole Plan	Whole plan	Amend	The general rules are also 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.	Amend the rules so they are easier for lay people to read.
Rosalie Sampson (S539)	S539.007	Whole Plan	Whole plan	Amend	based on the current matters which could be required by council and the vast scope provided gives council a large range of matters to restrict development. Having rules which restrict/delay development or make this process much more difficult seems contradictory to the national direction for supporting development.	Review the plan so that it is less restrictive of development.
Rosalie Sampson (S539)	S539.008	Natural Hazards	Natural Hazards Rules	Amend	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 the recent flooding activity, even though both hazards have a similar possible return period.	Ensure that hazards of a similar level of risk are treated similarly within the rules.
Rosalie Sampson (S539)	S539.009	Natural Hazards	Natural Hazards Rules	Amend	S.17 Avoid, Remedy or Mitigate are the fundamentals of the RMA - Options for implementing these are very limited in this document and over all, it only seems to consider avoiding development, which in an ocean locked country on a fault line is border line impossible, and we should instead be focused on adaptability to the environment, as ultimately people need a place to live	Provide for more options within the rules to remedy or mitigate against the risks of natural hazards rather than pursuing "avoid" approaches

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Rosalie Sampson (S539)	S539.010	Whole Plan	Whole plan	Amend	The plan is supposed to be viable for someone to be able to understand and submit an application, without requiring professional help, however I would say that this is border line impossible	amend the plan so it is more usable, functional and user friendly, for both planners and the general public.
Rosemary Erickson (S280)	S280.001	Planning Maps and Overlays	Mineral Extraction Zone	Oppose	<p>Already as one drives along the pristine road between Greymouth and Barrytown, there are natural lowland environments being destroyed. Enough is enough.</p> <p>There will be cartage of minerals, there will be road infrastructure changes, there will be sites changed in the abstraction beyond repair in the natural sense. These are the drives and the quiet untouched parts of New Zealand that people pine for and come to view. This is the west coast. Don't destroy what beauty you have.</p>	No mineral abstraction to be allowed in the Barrytown area.
Ross Wildbore (S389)	S389.001	Planning Maps and Overlays	Rezoning Requests	Amend	<p>.Mining is one of the most destructive/noisy industries generally motivated by money not enviromental protection. It therefore should come under more scrutiny not less, and the communities/neighbours/businesses that will be effected by such activites should be consulted.</p> <p>This proposed zone is located in amongst housing, businesses &amp; farms in a quiet coastal setting famed for its enviromental beauty -not an industrial hub. Its not an appropriate location for this zone.</p> <p>If the Minz get approved for the plan its likely to stay in the plan for the next 15-25 yrs which is going to potentially devalue all the surrounding properties for up to a quarter of a century! This will turn over the rights of the</p>	Amend Amend - Barrytown Flats Mineral Zone - ie remove it from plan. This should be changed to General Rural Zone.

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					residents/farming/tourism businesses in favour of the mining industry in terms of noise emissions, traffic & environmental concerns. Consideration needs to be given to reverse sensitivity. Currently there is no large scale mining/industrial activity in Barrytown, any changes to this will no doubt change the area and impact on residents etc and should require consenting and public notification.	
Ross Wildbore (S389)	S389.002	Mineral Extraction Zone	Overview	Support	We generally support the guidelines in the draft TTPP for Mineral extraction zones where long term activities are already existing, and not impacting on other businesses, housing & farms etc.	Only zone areas mineral extraction zone where they fit with the approach outlined in the overview.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.001	Whole Plan	Whole plan	Amend	The Plan is long, complex, and confusing.	Amend the Plan to simplify, unify and comply with the expectation of the Local Government Reorganisation Scheme (West Coast) Order 2019.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.002	Coastal Environment	Coastal Environment	Amend	The Plan lacks alignment with regional and national policy direction including NZCPS Policy 1 and Policy 11.	Ensure provisions align with NZCPS.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.003	STRATEGIC DIRECTION	STRATEGIC DIRECTION	Amend	Under the Resource Management Act 1991 (RMA), local government is required to consider the effects of climate change on communities as a matter of importance, through s6(h) the management of significant risks from natural hazards;	Amend the Plan to include a strategic objective for climate mitigation and adaptation.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.004	Natural Hazards	Natural Hazards	Amend	From 1 December 2022, councils when making and amending regional policies, and regional and district plans, must have regard to emissions reduction plans and national adaptation plans.	Amend the Plan to have regard to emissions reduction plan and national adaptation plan.

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Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.005	Natural Hazards	Natural Hazards	Amend	While the Natural Hazards and Risks chapter is rightfully focussed on protecting people and infrastructure, we are concerned that does not explicitly consider at-risk and threatened native species, or biodiversity more broadly, that may be displaced by climate change related extreme weather events or sea level rise.	Amend the Plan so areas that contain threatened and at-risk native species and indigenous biodiversity more broadly are considered in the Natural Hazards and Risks chapter and provision is made for their range expansion in response to climate related displacement.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.006	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity	Amend	Forest & Bird recommends that the Wildlands Report should be used as the basis for an immediate regionwide SNA survey.	Direct the use of the Wildlands Report as the basis to immediately progress a consistent region wide SNA assessment.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.007	Interpretation	SIGNIFICANT NATURAL AREA	Amend	'Significant Natural Area' should be defined as it is in the WCRPS, and that defined term should be used throughout the Plan.	Define SNA as it is in the WCRPS.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.008	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity Policies	Amend	WCRPS policies should be replicated in this Plan, rather than reinventing policy direction that creates inconsistencies and confusion with giving effect to that policy direction of the WCRPS for the region.	Replace the ECO chapter policies with those from the WCRPS.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.009	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity	Amend	The provisions of the ECO chapter do not protect significant habitat of fauna, where that is found in non-indigenous vegetation, because the rules only regulate indigenous vegetation clearance.	Amend the Plan provisions to ensure of protection to significant habitats of indigenous fauna, including from exotic vegetation clearance.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.010	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity Rules	Amend	In the meantime, identification, and mapping of SNAs is proposed to be undertaken through a resource consent process.	Include a general consent requirement for all indigenous vegetation clearance to undertake an ecological assessment as part of the consent application applying the significance criteria in Appendix 1 of the WCRPS. Where Significant Natural Areas are determined, including those in Schedule Four, manage all vegetation clearance within those areas

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						through discretionary or non-complying rules.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.011	Whole Plan	Whole plan	Amend	The provisions are severely deficient on the protection of SNAs that have not yet been identified in the schedule and maps of the Plan.	Ensure that all chapters in the Plan give the appropriate level of protection to SNAs, whether in Schedule Four or not.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.012	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity	Amend	Relying on consenting to identify and protect SNAs is inadequate given the permitted activity rules which would result in the loss of such biodiversity.	Include a clear explanation in the Introduction to the ECO chapter that SNAs that have not yet been identified are to be given the same protection as those already in Schedule Four. Also make this clear in the policies, and the rule framework.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.013	Planning Maps and Overlays	Rezoning Requests	Amend	The rationale for the zoning of public conservation land (PCL) is unclear. The zoning also appears to be arbitrary and not consistent with the purpose for which the land is held.	Rezone all public conservation land to Natural Open Space Zone (NOSZ) and update the Planning maps to reflect this.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.014	Planning Maps and Overlays	Planning Maps and Overlays	Amend	On the planning maps, PCL is very difficult to distinguish from other Crown owned land or private land.	Clearly identify public conservation land on the planning maps.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.015	Buller Coalfield Zone	Buller Coalfield Zone	Oppose	The approach to mineral extraction and ancillary activities in the Plan is too permissive.	Delete the Buller Coalfield Zone (BCZ) and capture areas of lawfully established mineral extraction and ancillary activities as General Rural Zone (GRUZ) where they occur on private land, NOSZ if on private land but with high natural values, or where they occur on public conservation land, other than where zoning consistency with adjacent land is more appropriate.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.016	Mineral Extraction Zone	Mineral Extraction Zone	Oppose	Providing special permissive zoning for these activities is inconsistent with how other activities are provided for within and across various zones.	Delete the Mineral Extraction Zone (MINZ) and capture areas of lawfully established mineral extraction and ancillary activities as General Rural Zone (GRUZ) where they occur on private land, NOSZ if on private land but

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						with high natural values, or where they occur on public conservation land, other than where zoning consistency with adjacent land is more appropriate.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.017	General Rural Zone	General Rural Zone - Rules	Amend	The General Rural Zone (GRUZ) approach to mining is too permissive. However, with amendments, the GRUZ could provide a more appropriate framework in which to consider and manage the effects of new mining activities outside of PCL/high natural value land, rather than the special purpose zones BCZ and MINZ.	Amend rules in the GRUZ, so that all mining activities, including prospecting, exploration, extraction and processing and ancillary activities should require at least a discretionary consent. Allow for a lesser consenting requirement for small scale farm quarries in the GRUZ, for example restricted discretionary.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.018	Natural Open Space Zone	NOSZ - Natural Open Space Zone Rules	Amend	Coal, gold, and gravel extraction has adverse and often irreversible effects on indigenous vegetation and habitats of indigenous fauna, including in some cases total loss.	Amend rules in NOSZ, to make all mining activities prohibited in that zone.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.019	Whole Plan	Whole plan	Amend	Coal, gold, and gravel extraction has adverse and often irreversible effects on indigenous vegetation and habitats of indigenous fauna, including in some cases total loss. Any new mining and ancillary mining activity, including extensions to existing mines, regardless of location, needs to be subject to a full effects assessment through a consenting process	Include as requirement in all rules for mining activities a full assessment of effects, a significance assessment against the significant criteria in the WCRPS.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.020	ZONES	ZONES	Amend	Coal, gold, and gravel extraction has adverse and often irreversible effects on indigenous vegetation and habitats of indigenous fauna, including in some cases total loss. Any new mining and ancillary mining activity, including extensions to existing mines, regardless of location, needs to be subject to a full effects assessment through a consenting process.	Amend rules in all zones,, so that all mining activities, including prospecting, exploration, extraction and processing and ancillary activities should require at least a discretionary consent.



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Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.021	Schedule Ten:Previously Mined Locations in the Rural and Open Space and Recreation Zones	Schedule Ten:Previously Mined Locations in the Rural and Open Space and Recreation Zones	Oppose	It is not clear what purpose Schedule Ten serves. Previously mined areas may now have important natural values. We also note that Schedule Ten is empty. Unless its utility is proven, we seek that it is deleted.	Delete Schedule 10
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.022	Planning Maps and Overlays	Rezoning Requests	Amend	Providing special permissive zoning for these activities is inconsistent with how other activities are provided for within and across various zones. Such zoning detracts from the broader context, changes the zone purpose, and attributes such that the management of effects and rehabilitation requirements become uncertain.	Amend zoning maps to remove the BCZ and MINZ capture areas of lawfully established mineral extraction and ancillary activities as General Rural Zone (GRUZ) where they occur on private land, NOSZ if on private land but with high natural values, and as Natural Open Space Zone (NOSZ) where they occur on public conservation land, other than where zoning consistency with adjacent land is more appropriate.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.023	Schedule Nine: Lawfully Established Mineral Extraction and Processing Areas	SCHE09 - LAWFULLY ESTABLISHED MINERAL EXTRACTION AND PROCESSING AREAS	Amend	This schedule should clearly identify, and state which activities are lawfully established on public conservation land or other crown owned land. These schedules could be useful for managing risk of reverse sensitivity, however, as they relate to the MINZ and BCZ, which we seek to be deleted, consideration should be given to how the Schedule is to be utilised.	Clarify and state in Schedule Nine where lawfully established mineral extraction and processing areas are, including where these areas exist on public conservation land.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.024	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity Rules	Amend	Coal, gold, and gravel extraction has adverse and often irreversible effects on indigenous vegetation and habitats of indigenous fauna, including in some cases total loss.	Amend the Plan so that vegetation clearance for mineral extraction within any significant natural area(s) is at least a non-complying activity.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.025	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity	Amend	The ECO chapter (as amended by this submission) sets out what is expected for biodiversity effects management, including biodiversity offsetting and compensation. This is in accordance	All effects on biodiversity must be dealt with in accordance with Chapter Seven WCRPS, which we have submitted should be incorporated into the ECO chapter.

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					with the clear requirements of the WCRPS, Chapter Seven.	
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.026	Financial Contributions	Financial Contributions	Amend	The district Plan cannot contain provisions that do not give effect to Chapter 7 WCRPS. That means that any provision for financial contributions in lieu of following the required WCRPS approach for biodiversity, whether in the Financial Contributions chapter or elsewhere in the Plan, are inappropriate and must be deleted.	All provisions in the Financial Contributions chapter that provide for financial contributions in lieu of appropriately managing adverse effects, in particular on biodiversity and landscape, should be deleted.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.027	Whole Plan	Whole plan	Amend	As sought above, we seek that any provision in the Plan that deals with effects on biodiversity includes a requirement to adhere to the provisions of the ECO chapter, and that any other standard of effects management is deleted. The ECO chapter (as amended by this submission) sets out what is expected for biodiversity effects management, including biodiversity offsetting and compensation. This is in accordance with the clear requirements of the WCRPS, Chapter Seven.	Where other chapters refer to biodiversity effects (e.g., ENG, INF, TRN), rather than including a different standard of effects management (e.g., 'minimising'), a specific requirement should be included to give effect to the ECO chapter provisions. Also amend the overviews of the ENG, INF, and TRN chapter to make it clear that the ECO chapter provisions apply with respect to effects on biodiversity.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.028	Whole Plan	Whole plan	Amend	We are unclear as to whether offsetting or compensation can robustly be applied as an effects management tool outside of the realm of biodiversity. The Plan provisions do not provide any direction as to what such offsetting would entail. Biodiversity offsetting has been developed over several years and has reasonably robust principles and approaches that apply to it. It is not clear how the council would be able to ensure that non-biodiversity effects would be appropriately offset or compensated for.	Use the same terminology as the WCRPS. That is using the terms biodiversity offsetting and biodiversity compensation when considering residual adverse effects on biodiversity.

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Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.029	Financial Contributions	FC - R12	Amend	We are unclear as to whether offsetting or compensation can robustly be applied as an effects management tool outside of the realm of biodiversity. The Plan provisions do not provide any direction as to what such offsetting would entail. Biodiversity offsetting has been developed over several years and has reasonably robust principles and approaches that apply to it. It is not clear how the council would be able to ensure that non-biodiversity effects would be appropriately offset or compensated for.	Where non-biodiversity offsetting or compensation is referred to in the Plan, provide policy direction, explanation, and potentially new definitions, clearly setting out what is required or envisaged. Alternatively delete the provisions referring to non-biodiversity offsetting.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.030	Whole Plan	Whole plan	Amend	We are unclear as to whether offsetting or compensation can robustly be applied as an effects management tool outside of the realm of biodiversity. The Plan provisions do not provide any direction as to what such offsetting would entail. Biodiversity offsetting has been developed over several years and has reasonably robust principles and approaches that apply to it. It is not clear how the council would be able to ensure that non-biodiversity effects would be appropriately offset or compensated for.	Where non-biodiversity offsetting or compensation is referred to in the Plan, provide policy direction, explanation, and potentially new definitions, clearly setting out what is required or envisaged. Alternatively delete the provisions referring to non-biodiversity offsetting.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.031	Planning Maps and Overlays	Coastal Environment	Amend	There are many sections along the coast where the Coastal Environment (CE) map layer, the extent landward of the Coastal Marine Area (CMA), is not identified. Urban areas appear to have been excluded from the CE map layer. The Plan's definition for the CE is vague and does not explain why urban areas are excluded. This definition and exclusion do not align with Policy 1 of the NZCPS which recognises that	Map the Coastal Environment again using appropriate experts to identify the extent by applying Policy 1 of the NZCPS.

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					natural features, areas at risk of coastal hazards, cultural and historic heritage as well as physical resources and built facilities, including infrastructure, located within the coastal environment, which may or may not be part of an urban area but are a part of the coastal environment.	
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.032	Planning Maps and Overlays	Coastal Environment	Amend	The Plan's definition for the CE is vague and does not explain why urban areas are excluded.	Until it is mapped accurately, include a default coastal environment of 2km landward of the CMA.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.033	Planning Maps and Overlays	Planning Maps and Overlays	Amend	Beyond urban areas there are a lot of properties for which the mapping tools say they cannot find an address. In those cases, there is no information. Even without an address the online map information for a property should be set out, including overlays and zoning which apply. It is hard to tell the specific special purpose zones apart and to identify whether they overlap.	a. Fix the map tool information so that all property information (i.e., zones and overlays) can be identified even when an address is not available. b. Add functionality to the map tool to enable individual special purpose zones to be selected.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.034	Whole Plan	Whole plan	Amend	The approach to referencing other relevant chapters, and in particular Overlay chapters, and how they apply to matters addressed in specific topic and zone chapters is inconsistent, uncertain and in many cases inadequate. The approach to when Overlay Chapters and their provisions apply does not adequately address for s6 and s7 RMA matters, directive requirements of the NZCPS and the WCRPS. This means that Overlay chapter provisions which apply beyond areas mapped as overlays are not considered relevant and in many cases	Apply a consistent approach across the whole Plan to cross-referencing or referring to other chapters. This must include reference to entire chapters, rather than giving the impression that only certain provisions apply, as is currently the case (e.g., 'overlay' provisions only). For chapter overviews at least, base this on the approach taken in the Open Space Zone 'Other relevant Te Tai Poutini Plan provisions', which lists all relevant chapters, with an explanation of their effect. Ensure that all relevant chapters include a section headed: "Other relevant Te Tai o Poutini Plan provisions." Under that heading, list all relevant chapters that may apply.

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					are not able to be considered in consent processes due to this approach. For example, the Ecosystems and Indigenous Biodiversity and Natural Character and Margins of Waterbodies contain provisions which apply beyond areas mapped as "overlays". Further, it is not clear why some Zone Overviews include reference to 'Other relevant Te Tai o Poutini Plan Provisions' and others don't. There is also variation as to how other chapters are referred to. A good approach is taken in the Open Space Zone chapter. That chapter lists the relevant chapters (although it incorrectly omits reference to the ECO chapter), rather than making a high level or unclear statement about 'other chapters' or 'overlay chapters'.	Ensure that the wording makes it abundantly clear that those chapters may apply regardless of whether a scheduled area is present:
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.035	Ecosystems and Indigenous Biodiversity	Overview	Amend	Ensure that its description refers to the fact that not all SNAs are scheduled:	Ecosystems and Indigenous Biodiversity - contains objectives, policies, and rules for managing effects on indigenous biodiversity, including for the assessment and identification of significant indigenous vegetation and significant habitats of indigenous fauna. This chapter contains rules relating to vegetation clearance that apply throughout the district. There are also specific rules that apply within significant natural areas, within outstanding natural features and landscapes and the coastal environment.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.036	Whole Plan	Whole plan	Amend	Apply a consistent approach across the whole Plan to cross-referencing or referring to other chapters. This must include reference to entire chapters, rather than giving the impression that	Ensure that all relevant chapters include a section headed: "Other relevant Te Tai o Poutini Plan provisions." Under that heading, list all relevant chapters that may apply. Ensure that the wording makes it abundantly

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					only certain provisions apply, as is currently the case (e.g., 'overlay' provisions only)The ECO chapter (at least) should be referenced in all Plan chapters, as it contains vegetation clearance rules that will apply to a large majority of activities regulated in other chapters.	clear that those chapters may apply regardless of whether a scheduled area is present: "Other relevant Te Tai o Poutini Plan provisions It is important to note that in addition to the provisions of this chapter, a number of Part 2: District Wide chapters also contain provisions that may be relevant to activities in these zones. These chapters include provisions that apply everywhere in the district, as well as some rules that only apply within identified and/or scheduled features (or overlays). Please refer to those chapters, including:" Then list all relevant chapters, with a brief explanation of what they do, based on the OSZ approach. Include (but not limited to) at least the ECO, NFL, NC, CE chapters.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.037	Coastal Environment	CE - R20	Amend	The Plan approach to the National Environmental Standards for Plantation Forestry (NES PF) is uncertain with respect to the protection of Significant Natural Areas. This means that the Plan needs to ensure that vegetation clearance is also managed where afforestation is planned. Where an assessment determines that the significance criteria in Appendix 1 of the WCRPS is met, Plantation Forestry would not be an appropriate activity.	Amend Rule CE-R20 to include areas of High natural coastal character and the rule activity status to non-complying.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.038	Coastal Environment	Coastal Environment Rules	Amend	Plantation Forestry is not an appropriate activity within Significant Natural Areas, in High Natural Coastal Character or any Outstanding natural coastal areas and should not be anticipated to occur in these areas under the Plan. In other parts of the coastal environment a full consideration	Add a new Rule discretionary rule for Afforestation with Plantation Forestry in the Coastal environment outside High Coastal Natural Character and Outstanding Coastal Environment Area overlays which is subject to the condition that the area for afforestation does not include any biodiversity meeting the significance criteria in Appendix 1 of the

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					of effects is required, and such consideration must be subject to an assessment confirming the site does not include any biodiversity meeting the significance criteria in Appendix 1 of the WCRPS.	WCRPS.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.039	Natural Character and Margins of Waterbodies	Natural Character and Margins of Waterbodies	Amend	The Natural Character and Margins of Waterbodies chapter will not meet the requirements of s6(a) to preserve and protect the natural character of waterbodies and their margins. It is far too permissive to achieve that. It also appears to include provisions that duplicate the rules for activities in or near wetlands in the NESFM. District plans may not include provisions that are more lenient than the NESFM, however, this is what this Plan does. The chapter needs significant revision to remove the duplication. It also needs to include a much clearer statement about how the chapter and the NESFM work together.	Thoroughly revise the chapter to ensure the rules either remove duplication of, or are more stringent than, the regulations in the NESFM for 'natural wetlands' as defined by that document.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.040	Natural Character and Margins of Waterbodies	Natural Character and the Margins of Waterbodies Rules	Amend	We do support the Plan regulating activities in the margins of 'wetlands', as that is defined in the RMA, rather than only 'natural wetlands' as defined in the NESFM. As such, the Plan needs to include rules protecting the margins of wetlands not protected by the NESFM.	Include rules protecting all other wetlands that meet the RMA definition. The Councils have obligations to protect these wetlands over and above the regulations in the NESFM.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.041	Natural Character and Margins of Waterbodies	Natural Character and the Margins of Waterbodies Rules	Amend	The activities proposed to be permitted in riparian margins are completely inappropriate. All works should be set well back from riparian margins to even consider assigning them permitted status. The chapter covers vegetation clearance, earthworks, buildings, and structures in riparian margins. It	Revise the objectives, policies, and rules to give effect to s6(a) requirements. Remove permitted activities from all riparian margins. Include a method to encourage restoration.

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					appears that the intention is that the rules in other chapters, for example the vegetation clearance rules in the ECO chapter, will not apply. It appears to do this on the basis of s6(a). However, this approach does not give effect to s6(c). The proposed rules in this chapter would allow a lot of vegetation clearance, in areas that may be SNA. We seek that the rules be at least as stringent, if not more stringent than, the rules in the ECO chapter. Works in riparian margins may well need a stricter approach, given the effects that they can have. Earthworks rules may also need to mirror those, or be more stringent than, those in the EW chapter.	
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.042	Natural Character and Margins of Waterbodies	Natural Character and the Margins of Waterbodies Rules	Amend	The chapter covers vegetation clearance, earthworks, buildings, and structures in riparian margins. Works in riparian margins may well need a stricter approach, given the effects that they can have. Earthworks rules may also need to mirror those, or be more stringent than, those in the EW chapter.	All vegetation clearance associated with earthworks must be governed by rules at least as, if not more, stringent, than the ECO chapter as amended by our submission.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.043	Subdivision	Subdivision Rules	Amend	We seek that the rules be at least as stringent, if not more stringent than, the rules in the ECO chapter. Works in riparian margins may well need a stricter approach, given the effects that they can have.	Amend rules to ensure that waterbodies and their margins are protected in the subdivision process, in a similar way to how SNAs are to be protected.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.044	Natural Character and Margins of Waterbodies	Natural Character and Margins of Waterbodies	Amend	We submit that there may be merit in incorporating the rules in this chapter into other chapters, such as ECO and EW. This would avoid the risk that this chapter is overlooked by Plan users when ascertaining the rule status of a proposed activity.	If the approach of a separate chapter for rules in riparian margins is retained, it must be referenced throughout the Plan in all relevant provisions and chapters.



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Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.045	How The Plan Works	Step 1 - Check the planning maps	Support	It is impossible to tell the different special purpose zones apart from those with labels.	Retain and improve the labelling of Special purpose zones Consider adding patterns or functionality to better distinguish between special purpose zones
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.046	How The Plan Works	General Approach	Amend	If the term 'overlay chapters' is to be retained, amend to make clear that those chapters contain rules the also apply outside the scheduled overlays.	Amend: There may be several sets of district-wide rules that you need to check for your activity e.g., Subdivision rules and Earthworks rules. If there is an overlay or feature on your property you also need to check those rule sets. <b>Additionally, the 'overlay chapters' contain rules that apply district-wide, outside the scheduled overlays. For example, the Ecosystems and Indigenous Biodiversity chapter.</b>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.047	How The Plan Works	General Approach	Amend	This could be interpreted incorrectly that an activity is permitted even where part of the activity requires consent.	Amend to clarify that if the works, project, or activity you are wanting to undertake requires consent for any aspect of it, a consent application is required for the whole activity. You should talk to the Council about whether any permitted activities may still apply.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.048	How The Plan Works	General Approach	Amend	It is not optional whether to get a consent or not. The AEE requirements for Controlled and RD activities create uncertainty for whether.	Amend as follows: Decide if you <b>still</b> want to <b>undertake your activity and</b> apply for resource consent Delete the limitations for AEE's with respect to controlled and restricted discretionary activities.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.049	How The Plan Works	Cross Boundary Matters	Amend	The methods and explanation focus on things that occur outside of the Plan. It is not clear how this Plan responds to integration in areas where both councils have responsibilities such as margins of water bodies.	Add an explanation of how this Plan responds to cross boundary issues
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.050	How The Plan Works	Special Purpose Zone Descriptions	Amend	Delete the "Special Purpose Zones SPZ" this grouping of all special purpose zones is not used in the Plan.	Delete the "Special Purpose Zones SPZ"  Consequential amendments to deleting the corresponding zones:

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Zealand Inc. (Forest & Bird) (S560)					Consequential amendments to deleting the corresponding zones, the Buller Coalfield zone, and the Mineral Extraction Zone.	Delete the Buller Coalfield zone Delete Mineral Extraction Zone
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.051	How The Plan Works	Overlays	Amend	Generally, agree that it is helpful to retain a schedule of Lawfully Established Mineral Extraction and Processing Areas. However, this is not needed as an overlay.	Delete Schedule 9 from overlays. Retain as schedule with amendments as sought by Forest and Bird on SCHED 9 in this submission.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.052	How The Plan Works	Development area	Oppose	There is no information of what is intended for these development areas.	Delete the development areas table and amend the map tools heading as follows: "Zones and <del>Development Areas</del> "
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.053	Interpretation	Interpretation	Amend	When the Plan or a section of it is "printed" (using the print function on the online Plan), any identification of defined terms is lost. There also appear to be terms defined in the Plan text that are not captured in the interpretation list. E.g., "Environment". Amendments are needed to comply with the NPS 10. Format standard, Differentiating defined terms.	Ensure that terms defined are identifiable not only on the online version but also when "printed" in the Plan are differentiated from other text. Where terms are from legislation include the title and version. Ensure the Interpretation list include all terms defined in the Plan
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.054	Interpretation	ACCESSWAY	Amend	Clarify whether this is specific to vehicle access or includes walking access, to private property, like driveways or other situations.	Clarify and retain
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.055	Interpretation	ACTIVITY	Oppose	This definition may not be helpful and could exclude "activities" that are intended to be considered in the Plan.	Delete
Royal Forest and Bird Protection Society of New	S560.056	Interpretation	AGRICULTURAL, PASTORAL AND HORTICULTURAL ACTIVITIES	Amend	A number of rules to permit activities within this definition. However, many of the activities are not restricted in scale	Include the following advice notes in GRUZ - R1 and all other rules that permit these activities: a) "The NES for Freshwater includes

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Zealand Inc. (Forest & Bird) (S560)					or by location to protect significant, high, and outstanding values.	regulations on sphagnum moss" b) "Any indigenous vegetation clearance or disturbance is subject to the relevant rules in the Ecosystems and Biodiversity Chapter." c) "Activities in the Coastal environment are subject to the CE chapter provisions".
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.057	Interpretation	AREA OF SIGNIFICANT INDIGENOUS BIODIVERSITY	Oppose	Forest & Bird agrees that significant areas of indigenous biodiversity include areas that meet the criteria in Appendix 1 of the WCRPS and that this includes those in Schedule Four.	Delete this definition and rely on the definition of "Significant Natural Area or SNA" with respect to subdivision.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.058	Interpretation	BUILDING PLATFORM	Amend	It is uncertain how the definition should be applied in rules where the matters specified in the definition are not the subject of conditions or standards.	Delete <del>having regard to ground conditions, gradient, access, natural hazards, indigenous vegetation and habitat, amenity and health and safety</del> from the definition and make sure these matters are included in rules which make provision for building platforms.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.059	Interpretation	COASTAL ENVIRONMENT	Amend	Consistency with Policy 1 of the NZCPS.	Amend the definition to mean those areas described in Policy 1 of the NZCPS landward of the CMA and as shown on the Planning maps.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.060	Interpretation	CONSERVATION ACTIVITIES	Oppose	The definition is not consistent with achieving restoration outcomes or protecting significant indigenous biodiversity. This is because "enhancement" does not always retain indigenous biodiversity.	Amend to limit the definition with respect to natural and ecological values, to activities aimed at restoration of ecosystem health and indigenous biodiversity.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.061	Interpretation	CRITICAL INFRA-STRUCTURE	Amend	The definition is quite broad and appears to capture infrastructure which may not in fact be critical infrastructure.	Reword the definition so that is limited to Specific entities and infrastructure that delivers a service operated by a "lifeline utility

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Zealand Inc. (Forest & Bird) (S560)						(as defined in the Civil Defence Emergency Management Act 2002)"
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.062	Interpretation	Definitions	Amend	The ECO chapter provides for 'cultural harvest' as a permitted activity, including within areas that may be significant or are required to be protected under policy 11 NZCPS.	Include a clear definition for cultural harvest that ensures the harvest is done in a way that biodiversity values are protected.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.063	Interpretation	ENERGY ACTIVITY	Oppose	The Energy Activities chapter overview sets out that these activities are recognized as regionally significant infrastructure.	Delete the definition
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.064	Interpretation	EXISTING BUILDINGS AND STRUCTURES	Amend	The definition clearly includes buildings and structures that are not existing.	b. <del>Existing</del> <b>Lawfully established</b> buildings and structures
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.065	Interpretation	INDIGENOUS VEGETATION CLEARANCE	Amend	<p>The Plan needs to protect the significant habitats of indigenous fauna, where that is found outside indigenous vegetation. As such, the definition should not be limited to indigenous clearance.</p> <p>We have submitted below that most of the ECO rules should only apply to indigenous vegetation clearance, except within Significant Natural Areas, where the rules should regulate all vegetation clearance.</p> <p>Destruction and smothering are also forms of vegetation clearance that should be added to the definition.</p>	Amend Indigenous vegetation clearance: means the clearing or removal <b>or destruction</b> of indigenous vegetation by any means, including cutting, crushing, <b>smothering</b> , cultivation, irrigation, chemical application, drainage, stopbanking, overplanting, or burning. <b>Indigenous vegetation clearance has the same meaning as it applies to native vegetation</b>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.066	Interpretation	LAKE	Oppose	The definition is inconsistent with the RMA definition.	Delete the definition and rely on the interpretation in the RMA.

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Zealand Inc. (Forest & Bird) (S560)						
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.067	Interpretation	LAWFULLY ESTABLISHED	Amend	The definition should be clear that with respect to activities for which resource consent or license is required, the activity ceases to be lawful when the consent or license expires.	Amend Lawfully established <b>In relation to buildings and structures, means buildings, and structures that: Were lawfully established at the date of notification of the Plan; or Where resource consent has been granted at the date of notification of the Plan; or Where building consent has been granted for an activity lawfully approved under a previous District Plan. In relation to activities</b> means activities: permitted through a rule in a Plan, a resource consent; <b>or</b> a national environmental standard or by an existing use right (as provided for in Section 10 of the RMA); <b>or</b> <del>in the case of mineral extraction it also includes</del> an activity permitted through a Coal Mining Licence issued under the Coal Mines Act (1979); <b>and d. does not include where the resource consent or licence has expired and not been renewed.</b>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.068	Interpretation	MAINTENANCE	Support	With respect to infrastructure and renewable electricity generation we support that the definition does not include upgrading so that this can be recognised as a specific and separate activity.	Retain
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.069	Interpretation	MĀORI PURPOSE ACTIVITIES	Amend	Forest & Bird are concerned that the definition may incorporate much larger scale economic development activities that could have significant effects on natural values.	Clarify the intended meaning of 'and/or integrated Māori integrated development' and amend if appropriate.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.070	Interpretation	MINERAL EXTRACTION	Amend	This definition includes several activities not actually part of extraction itself.	Forest & Bird has sought amendments to all mining activity rules, including prospecting, exploration, extraction, processing, and ancillary activities. Provided those changes are made, the broad definition is probably

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						acceptable.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.071	Interpretation	MINERAL EXTRACTION MANAGEMENT PLAN	Oppose	This definition only appears in provisions of the Buller Coalfield zone, which Forest & Bird opposes in its entirety.	Delete.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.072	Interpretation	OPEN SPACE MANAGEMENT PLAN	Amend	Management Plans under other legislation do not absolve the council of its responsibilities and functions under the RMA.	Retain and limit rules and other considerations based on this definition to areas and activities outside the natural open space zone and overlays, and outside areas of significant indigenous biodiversity.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.073	Interpretation	OVERLAY CHAPTER	Amend	It would be more helpful to list each chapter, rather than referring to sections of the Plan.	Retain with amendments List each overlay chapter and explain the difference or relationship with overlay provisions, in particular that these chapters contain provisions that apply both within and outside of the scheduled overlays.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.074	Interpretation	POUTINI NGĀI TAHU ACTIVITIES	Amend	Forest & Bird are unclear however why there are two definitions and activities used in the Plan that cover apparently very similar subject matter - this definition and 'Māori Purpose Activities'.	Clarify difference between this and 'Māori Purpose activities' - both in the definitions and the various Plan provisions and amalgamate if appropriate.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.075	Interpretation	RENEWABLE ELECTRICITY GENERATION ACTIVITIES	Amend	The further inclusions appear to extend to infrastructure beyond "structures" and possibly to earthworks and Planting for site rehabilitation works.	Amend the definition to clarify its application to renewable electricity generation structures and associated/ancillary infrastructure
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.076	Interpretation	RIPARIAN MARGIN	Amend	Subsequent amendment, to give effect to the submission points made below (for example in relation to works adjacent to wetlands and the relationship with the NESFM).	Amend if necessary to give effect to submission points on the NC chapter.
Royal Forest and Bird Protection Society of New	S560.077	Interpretation	SIGNIFICANT NATURAL AREA	Amend	The definition is inconsistent with the corresponding definition in the WCRPS.	Delete and replace: <b>means an area of significant indigenous vegetation, and/or significant habitats of indigenous fauna which has been identified using the criteria</b>

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Zealand Inc. (Forest & Bird) (S560)						<b>listed in Appendix 1 or 2 and included in Schedule 4 or a regional Plan; or an area which although not included on Schedule 4 nevertheless meets one or more of the criteria listed in Appendix 1 or 2.</b>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.078	Interpretation	TEMPORARY ACTIVITY	Amend	This definition makes the application of rules uncertain. If an activity does not meet a zone standard consent processes should apply.	Amend the exclusions aspect of the definition as follows: "Note: Temporary Activities do not include: i. <del>Permitted</del> Recreation Activities <del>meeting</del> <b>addressed within</b> Zone <del>rules</del> <b>standards</b> ; ii. Events and other types of activities <del>meeting</del> <b>addressed within</b> Zone <del>standards</del> <b>rules</b> in the Stadium Zone or any Open Space and Recreation Zone; or iii. Temporary military training activities.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.079	Interpretation	URBAN ZONE	Amend	It is inappropriate to include the "future urban zone" within this definition. That zone should not be considered urban until it is rezoned.	Amend means one or more of the RESZ - Residential zones, CMUZ - Commercial and mixed-use zones, INZ - industrial zones, <del>FUZ - Future Urban Zone</del> or any part of any OSRZ - Open space and recreation zone that is surrounded by one of these zones
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.080	Interpretation	WETLAND	Support		Retain
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.081	Interpretation	Definitions	Amend	There is no definition of "minor upgrade", even though provision is made for this with respect to network utilities and renewable energy generation activities often within the same rule as for maintenance.	Include a definition for "minor upgrade" of a scale to appropriate to the permitted NC and CE rules they are provided for in so that adverse effects would be no more than minor.
Royal Forest and Bird Protection Society of New	S560.082	Interpretation	Definitions	Amend	Consider including a definition for indigenous vegetation. This may be necessary as we have submitted that	Add <b>Indigenous vegetation means vascular and nonvascular Plants that are native to</b>

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Zealand Inc. (Forest & Bird) (S560)					some of the vegetation clearance rules should only apply to indigenous vegetation, whereas in other circumstances all vegetation clearance should be regulated.	<b>the ecological district.</b>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.083	National Direction Instruments	National environmental standards	Amend	It would be helpful to explain that an NES applies directly to activities alongside Plans.	Add a new second sentence, as follows: <b>NES requirements apply directly to activities and must be considered in addition to Plan provisions.</b> If and activity... .
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.084	National Direction Instruments	Regulations	Amend	The wording "included in this chapter" suggests that the regulations are part of the Plan. The relationship of regulations to the Plan and responsibilities of Plan uses with respect to both should be clarified.	Amend: The regulations <del>included in this chapter</del> <b>listed below are those that</b> come under the Resource Management Act 1991 (excluding the national environmental standards listed above). <b>Regulations are rules that apply directly to activities and must be considered in addition to Plan provisions. Unless otherwise stated with respect to rule in this Plan, where both a regulation and a Plan rule address the same matter, the more stringent requirement will apply.</b> These regulations are:
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.085	STRATEGIC DIRECTION	Strategic Directions Overview	Amend	There is a need to ensure that relevant provisions are not excluded from consideration by omission in this statement, the wording should be amended to all relevant objectives and policies.	Amend: Strategic Objectives and Policies form an important part of the resource consent framework and should be considered alongside the <b>other</b> relevant <del>zone or overlay</del> objectives and policies when assessing resource consents.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.086	STRATEGIC DIRECTION	AG	Oppose	The statement on how to read the strategic objectives at the bottom of this chapter is inappropriate for the reasons set out with respect to the Strategic Directions Overview above.	Delete: <del>For the purposes of preparing, changing, interpreting and implementing Te Tai o Poutini Plan all other objectives and policies in all other chapters of Te Tai o Poutini Plan are to be read and achieved in a</del>



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						manner consistent with these strategic objectives.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.087	STRATEGIC DIRECTION	AG - O2	Amend	The word "enable" is particularly directive for support industries and services. As it is not clear what these may be or their environmental effects, they should not be enabled carteblanche.	Delete the word "enable" as follows: "To recognise the significance of agriculture to the West Coast economy, provide for agricultural development and innovation and <del>enable</del> the support industries and services needed to maintain agricultural viability within rural areas."
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.088	STRATEGIC DIRECTION	Connections and Resilience	Oppose	The statement on how to read the strategic objectives at the bottom of this chapter is inappropriate for the reasons set out with respect to the Strategic Directions Overview above.	Delete: <del>For the purposes of preparing, changing, interpreting and implementing Te Tai o Poutini Plan all other objectives and policies in all other chapters of Te Tai o Poutini Plan are to be read and achieved in a manner consistent with these strategic objectives.</del>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.089	STRATEGIC DIRECTION	CR - O4	Oppose	It would not be appropriate to enable development of critical infrastructure in inappropriate locations, such as areas at risk or natural hazards or at the expense of significant and outstanding values.	Delete
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.090	STRATEGIC DIRECTION	Strategic Directions Overview	Oppose	The statement on how to read the strategic objectives at the bottom of this chapter is inappropriate for the reasons set out with respect to the Strategic Directions Overview above.	Delete: <del>"For the purposes of preparing, changing, interpreting and implementing Te Tai o Poutini Plan all other objectives and policies in all other chapters of Te Tai o Poutini Plan are to be read and achieved in a manner consistent with these strategic objectives."</del>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.091	STRATEGIC DIRECTION	MIN - O1	Oppose	It is not clear what "duplication of regulation between agencies" refers to. Council should not ensure such things in the abstract without applying its responsibilities and carrying out its functions under the RMA.	Delete MIN - O1

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Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.092	STRATEGIC DIRECTION	MIN - O2	Oppose	Enabling is not appropriate in the abstract without addressing adverse effects. Inconsistent with s5, s6 and s7 of the RMA. Also concerning that this would specifically enable extraction within zones that have significant natural values without any consideration of overlays or other significant values.	Delete MIN - O2
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.093	STRATEGIC DIRECTION	MIN - O3	Amend	The objective lacks any strategic basis and does not appear appropriate to this section of the Plan. At a strategic level, extraction which provides regional or national economic and social benefits can be recognized where adverse effects are avoided, remedies and mitigated.	Delete MIN - O3 or amend as follows: "To recognise that mineral resources are widespread and fixed in location throughout the West Coast/Te Tai o Poutini and that <b>extraction of them may provide economic and social benefits to the region and nationally</b> provided adverse effects <b>can be appropriately avoided, remedied and mitigated</b> <del>are managed, mineral extraction activities can be appropriate in a range of locations outside specified zones and precincts.</del> "
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.094	STRATEGIC DIRECTION	MIN - O4	Amend	It is appropriate to consider potential for reverse sensitivity issues on lawfully established activities for new subdivision, use and development.	Amend To ensure that new subdivision, use and development does not compromise existing <b>lawfully established</b> mineral extraction activities, including through reverse sensitivity to effects such as dust, noise and traffic generation.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.095	STRATEGIC DIRECTION	MIN - O5	Support	Support this approach	Retain
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.096	STRATEGIC DIRECTION	MIN - O6	Oppose	Does not ensure adverse effects would be avoided where necessary to protect s6(c) matters or to achieve other objectives.	Delete MIN - O6

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Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.097	STRATEGIC DIRECTION	NENV	Oppose	The statement on how to read the strategic objectives at the bottom of this chapter is inappropriate for the reasons set out with respect to the Strategic Directions Overview above.	Delete: " <del>For the purposes of preparing, changing, interpreting and implementing Te Tai o Poutini Plan all other objectives and policies in all other chapters of Te Tai o Poutini Plan are to be read and achieved in a manner consistent with these strategic objectives.</del> "
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.098	STRATEGIC DIRECTION	NENV- O1	Support	Not adequate to achieve s6 and give effect to the WCRPS without: policy for protection of s6(c) matters set out in the ECO chapter; and those provisions not being subservient to strategic direction provisions; and all other chapters differing to/implementing the ECO provisions with respect activities affecting indigenous biodiversity	Retain NENV - O1 subject to specific policy for protection of s6(c) matters set out in the ECO chapter being implemented and relevant across all chapters.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.099	STRATEGIC DIRECTION	NENV- O2	Amend	The reference to areas and features creates some uncertainty and potential tension with NENV - O1	It may be clearer to amend the objective to refer to the natural environment generally, rather than areas and features. This should remove any tension with NENV - O1 and achieve the act with respect to s6 matters.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.100	STRATEGIC DIRECTION	NENV - O3	Oppose	The explanation of the relationship of natural environmental values and public conservation land/conservation estate is not appropriate to the Plan and particularly not as a strategic objective.	Delete NENV - O3
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.101	STRATEGIC DIRECTION	NENV - O4	Amend	The objective does not capture areas which may not be unique but are non the less important. If the terminology is intended to capture RMA s6(a), (b) and (c) matters it is somewhat inconsistent with the terms used in those sections and those used in the NZCPS.	Amend: To clearly identify: <b>Unique and</b> important natural environment areas and features on the West Coast/Te Tai o Poutini which must be protected; and Areas where subdivision, use and development <b>activities</b> to enable community economic, cultural and social wellbeing <b>is appropriate or may be appropriate with conditions or where activities are not appropriate.</b> <del>can be sustainably managed."</del>

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Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.102	STRATEGIC DIRECTION	POU	Oppose	The statement on how to read the strategic objectives at the bottom of this chapter is inappropriate for the reasons set out with respect to the Strategic Directions Overview above.	Delete: " <del>For the purposes of preparing, changing, interpreting and implementing Te Tai o Poutini Plan all other objectives and policies in all other chapters of Te Tai o Poutini Plan are to be read and achieved in a manner consistent with these strategic objectives.</del> "
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.103	STRATEGIC DIRECTION	TRM	Oppose	The statement on how to read the strategic objectives at the bottom of this chapter is inappropriate for the reasons set out with respect to the Strategic Directions Overview above.	Delete: " <del>For the purposes of preparing, changing, interpreting and implementing Te Tai o Poutini Plan all other objectives and policies in all other chapters of Te Tai o Poutini Plan are to be read and achieved in a manner consistent with these strategic objectives.</del> "
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.104	STRATEGIC DIRECTION	TRM - O1	Amend	It is not clear that in managing adverse effects on the environment protection must be achieved in accordance with RMA s6(a), (b) and (c) and the NZCPS in the coastal environment.	Amend to include the protection of important natural environment areas and features and retain other aspects of objective as notified.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.105	STRATEGIC DIRECTION	Urban form and development	Oppose	The statement on how to read the strategic objectives at the bottom of this chapter is inappropriate for the reasons set out with respect to the Strategic Directions Overview above.	Delete " <del>For the purposes of preparing, changing, interpreting and implementing Te Tai o Poutini Plan all other objectives and policies in all other chapters of Te Tai o Poutini Plan are to be read and achieved in a manner consistent with this strategic objective.</del> "
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.106	STRATEGIC DIRECTION	UFD - O1	Amend	There needs to be better integration starting at the strategic level for the maintenance and preservation of indigenous biodiversity values in urban form and development, so that indigenous biodiversity is a valued aspect of urban environments, rather than as a separate consideration only in terms of managing adverse effects.	Retain matters 1 - 3 and 5- 10 Amend matter 4 as follows: 4. Recognise the risk of natural hazards whereby new development is located in <del>less</del> <b>away from identified</b> hazardous locations. Add three new matters as follows: <b>11. incorporate space for indigenous biodiversity values to be retained and enhanced; 12. supports natural inland migration of indigenous flora and fauna to adapt to sea level rise,</b>

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						<b>climate change and natural hazard events; and 13. uses low environmental impact practices, materials and design.</b>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.107	Energy	Energy	Amend	As proposed it could extend beyond electricity and renewable energy. Given the regionally significant nature of the energy activities intended to be addressed in this chapter, either the definition needs amending or the provisions in this chapter need to be specific to National Grid, electricity transmission, distribution and renewable electricity generation activities.	Either the definition of "Energy Activity" as sought above or amend all provisions in this chapter to be specific to National Grid or electricity transmission, distribution and renewable electricity generation activities.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.108	Energy	Energy	Amend	See Key Issue above for submission points.	Amend where this chapters refers to biodiversity effects: rather than including a different standard of effects management (e.g., 'minimising'), a specific requirement should be included to give effect to the ECO chapter provisions.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.109	Energy	ENG - O1	Support		Retain as notified
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.110	Energy	ENG - O2	Oppose	'Minimise' is not an appropriate effects management standard.	Delete objective;
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.111	Energy	ENG - O3	Oppose	This is too broad, and should be limited to electricity generation, distribution and supply and renewable energy generation.	Delete
Royal Forest and Bird Protection	S560.112	Energy	ENG - P1	Amend	Agree that it is appropriate to provide for these activities, however, there	Add to the policy: <b>while addressing adverse effects of these activities in accordance</b>

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Society of New Zealand Inc. (Forest & Bird) (S560)					needs to be clear direction as to how to address adverse effects.	<b>with the Natural Environment and District Wide chapters of this Plan.</b>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.113	Energy	ENG - P2	Amend	It is inappropriate to give higher consideration to energy activities than s6 matters or where this regard would conflict with a s7 matter.	Limit to definition of 'energy activities' as sought in Interpretation section of this submission.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.114	Energy	ENG - P4	Oppose	This policy purports to deal with adverse effects in a totally deficient way. Effects must be managed in accordance with the WCRPS, and the other chapters in the Plan, e.g., ECO.	Delete
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.115	Energy	ENG - P5	Amend	It is not clear what the functional constraints or operational requirements for energy activities would be that should require specific consideration.	Limit to definition of <b>energy activities</b> as sought in Interpretation section of this submission.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.116	Energy	ENG - P6	Support	The policy is specific to renewable electricity generation, which we support.	Retain as specific to renewable energy generation.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.117	Energy	ENG - P7	Amend	Avoid, remedy, and mitigate needs to be in other policies for this policy to make sense - however with the amendments sought above this will be solved.	Delete ENG - P7
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.118	Energy	ENG - P8	Amend	Clarify what a substantial upgrade is compared with other upgrades.	Amend: Clarify what 'substantial' means
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.119	Energy	ENG - R3	Oppose in part	In the case of a new substation there needs to be standards to limit vegetation clearance and protect any significant values identified in	Include requirement to meet the permitted vegetation clearance standards in the ECO chapter.

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					accordance with the criteria in the WCRPS.	
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.120	Energy	ENG - R4	Amend	Define minor upgrading, upgrading and substantial updating..	Include requirement to meet the permitted vegetation clearance standards in the ECO chapter
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.121	Energy	ENG - R5	Support in part	There are no standards to address effects on biodiversity.	Include requirement to meet the permitted vegetation clearance standards in the ECO chapter.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.122	Energy	ENG - R6	Amend	It would be clearer if the rule heading referred to the national grid yard and subdivision corridor, consistent with ENG-P9 rather than the Lines.	Limit to 'energy activities' as sought above in Interpretation section. Include requirement to meet the permitted vegetation clearance standards in the ECO chapter.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.123	Energy	ENG - R9	Amend		Limit to 'energy activities' as sought by submission in Interpretation section.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.124	Energy	ENG - R10	Amend		Include requirement to meet the permitted vegetation clearance standards in the ECO chapter.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.125	Energy	ENG - R11	Amend	The matters of discretion are inappropriate to provide for biodiversity and other natural values.	<p>Amend the matter of discretion: <del>The degree to which the proposed activity will cause significant adverse effects on overlay Chapter Matters</del></p> <ul style="list-style-type: none"> <li><b>Whether the activity will cause any adverse effects on Overlay Chapter matters, and the requirement to manage those effects in accordance with the relevant Overlay provisions.</b></li> </ul>

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<ul style="list-style-type: none"> <li>• Whether the activity will cause any adverse effects on areas meeting the significance criteria in Appendix 1 WCRPS, and the requirement to manage those effects in accordance with the relevant Overlay provisions.</li> <li>• The requirement to avoid and otherwise manage effects on biodiversity, natural character, and landscape in the coastal environment in accordance with policy 11, 13 and 15 NZCPS.</li> </ul>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.126	Energy	ENG - R12	Amend	The matters of discretion are inappropriate to provide for biodiversity and other natural values.	<p>Amend the matter of discretion in each rule:  <del>The degree to which the proposed activity will cause significant adverse effects on overlay Chapter Matters</del></p> <ul style="list-style-type: none"> <li>• Whether the activity will cause any adverse effects on Overlay Chapter matters, and the requirement to manage those effects in accordance with the relevant Overlay provisions.</li> <li>• Whether the activity will cause any adverse effects on areas meeting the significance criteria in Appendix 1 WCRPS, and the requirement to manage those effects in accordance with the relevant Overlay provisions.</li> <li>• The requirement to avoid and otherwise manage effects on biodiversity, natural character, and landscape in the coastal environment in accordance with policy 11, 13 and 15 NZCPS.</li> </ul>



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Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.127	Energy	ENG - R13	Amend	The matters of discretion are inappropriate to provide for biodiversity and other natural values.	<p>Amend the matter of discretion in each rule:<del>The degree to which the proposed activity will cause significant adverse effects on overlay Chapter Matters</del></p> <ul style="list-style-type: none"> <li>• <b>Whether the activity will cause any adverse effects on Overlay Chapter matters, and the requirement to manage those effects in accordance with the relevant Overlay provisions.</b></li> <li>• <b>Whether the activity will cause any adverse effects on areas meeting the significance criteria in Appendix 1 WCRPS, and the requirement to manage those effects in accordance with the relevant Overlay provisions.</b></li> <li>• <b>The requirement to avoid and otherwise manage effects on biodiversity, natural character, and landscape in the coastal environment in accordance with policy 11, 13 and 15 NZCPS.</b></li> </ul>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.128	Energy	ENG - R14	Amend	The matters of discretion are inappropriate to provide for biodiversity and other natural values.	<p>Amend the matter of discretion in each rule:<del>The degree to which the proposed activity will cause significant adverse effects on overlay Chapter Matters</del></p> <ul style="list-style-type: none"> <li>• <b>Whether the activity will cause any adverse effects on Overlay Chapter matters, and the requirement to manage those effects in accordance with the relevant Overlay provisions.</b></li> <li>• <b>Whether the activity will cause any adverse effects on areas meeting the significance criteria in</b></li> </ul>

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						<p><b>Appendix 1 WCRPS, and the requirement to manage those effects in accordance with the relevant Overlay provisions.</b></p> <ul style="list-style-type: none"> <li><b>The requirement to avoid and otherwise manage effects on biodiversity, natural character, and landscape in the coastal environment in accordance with policy 11, 13 and 15 NZCPS.</b></li> </ul>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.129	Energy	ENG - R15	Amend	It is unclear what is meant by 'large scale'. What is large scale? There is also no direction to protect natural values.	Define or otherwise clarify 'large scale'. Include requirement that in order to be discretionary, the activity must comply with at least the ECO, NFL, CE, and NC chapters.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.130	Energy	ENG - R16	Amend	The rule needs direction to protect natural values.	Include requirement that in order to be discretionary, the activity must comply with at least the ECO, NFL, CE, and NC chapters.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.131	Energy	ENG - R20	Amend	Reference needs to be made to R 15 and 16	Consequential change <b>for activities that do not meet R15 and R16</b>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.132	Infrastructure	Overview	Amend	It is not clear which "infrastructure" is addressed in this chapter.	Clarify the activities addressed by this chapter.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.133	Infrastructure	Infrastructure	Amend	See Key Issue above for submission points - Where this chapter refers to biodiversity effects	Replace biodiversity effects with a specific requirement to give effect to the ECO chapter provisions and any other natural environment or district wide provisions.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.134	Infrastructure	Infrastructure Rules	Amend	This is not the appropriate location for this information. These notes relate to where infrastructure is addressed in the	Incorporate notes 2, 3 and 4 into the overview and clarify the infrastructure addressed in this chapter and what is addressed in other

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Zealand Inc. (Forest & Bird) (S560)					Plan and are relevant to provisions beyond just rules.	chapters.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.135	Infrastructure	INF - O1	Amend	The objective needs to protect natural values.	Amend: To enable the ... needs of the West Coast/Te Tai o Poutini, <b>where adverse effects can be appropriately managed accordance with the Natural Environment and District Wide chapters of this Plan.</b>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.136	Infrastructure	INF - O4	Amend	Location is a key factor when considering infrastructure that may be affected by natural hazards and climate change.	To consider natural hazard <b>and biodiversity</b> resilience and impacts of climate change in infrastructure <b>location</b> , design, and provision.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.137	Infrastructure	INF - O5	Amend	The WCRPS includes specific direction for considering biodiversity adverse effects, and for RSI effects generally.	The adverse effects of infrastructure on the environment are <del>minimized</del> <b>avoided, remedied, and mitigated in accordance with the Natural Environment and District Wide chapters of this Plan"</b> , while recognising:...
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.138	Infrastructure	INF - P1	Amend	The WCRPS does not require the provision of RSI in all cases. Nor does it set direction for provision of infrastructure generally; it is specific to RSI.	Recognise <del>and provide for</del> the positive social, economic, cultural, and environmental benefits from the development, continued operation and upgrading of <b>network</b> utilities and infrastructure.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.139	Infrastructure	INF - P2	Amend	'Minimise' is not sufficient to give effect to s5 of the RMA which requires adverse effects to be avoided, remedied, and mitigated on the environment as well as other matters including safeguarding the life supporting of ecosystems.	Manage the design and location of <b>network</b> utilities and infrastructure, <del>including when sited in overlays</del> in a way which considers: a. Locational, technical, and operational constraints; <b>x. whether there are alternative locations or a functional need to locating within an Overlay area or any Significant Natural Area (being areas meeting criteria in Appendix 1 of the WCRPS whether mapped in the Plan or not);</b> b. Resilience <b>of the natural environment and of the infrastructure</b> to natural hazards and

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						climate change;... and f. The need to <del>minimise</del> <b>avoid, remedy, or mitigate</b> adverse effects on the environment <b>in accordance with the Natural Environment and District Wide chapters of this Plan"</b>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.140	Infrastructure	INF - P4	Amend	The ability to ensure this should be a consideration prior to subdivision and development and should include constraints such as where adverse effects on natural values can and should be avoided or cannot be adequately avoided, remedied, or mitigated and development is inappropriate.	Ensure that subdivision and development, <b>is can be</b> adequately serviced including: <b>In site selection and design considerations, assessing the adverse effects of subdivision and development as well as adverse effects of services when determining whether the subdivision or development should occur in that location in the first place; and that adequate services includes: ....</b>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.141	Infrastructure	INF - P6	Support		Retain
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.142	Infrastructure	INF - R2	Amend	How will the council know they have run out of capacity where this is used by permitted activities? This could result in significant environmental adverse effects occurring.	Amend to a controlled activity so that council can assess capacity.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.143	Infrastructure	INF - R2	Amend	The permitted activities do not protect natural values.	Include standard that this must also meet the permitted standards of the ECO, ONFL, CE, EW, and NC chapters.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.144	Infrastructure	INF - R3	Amend	The permitted activities do not protect natural values.	Include standard that this must also meet the permitted standards of the ECO, ONFL, CE, EW, and NC chapters.
Royal Forest and Bird Protection	S560.145	Infrastructure	INF - R4	Amend	The permitted activities do not protect natural values.	Include standard that this must also meet the permitted standards of the ECO, ONFL, CE,

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Society of New Zealand Inc. (Forest & Bird) (S560)						EW, and NC chapters.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.146	Infrastructure	INF - R5	Amend	The permitted activities do not protect natural values.	Include standard that this must also meet the permitted standards of the ECO, ONFL, CE, EW, and NC chapters.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.147	Infrastructure	INF - R6	Amend	The permitted activities do not protect natural values.	Include standard that this must also meet the permitted standards of the ECO, ONFL, CE, EW, and NC chapters.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.148	Infrastructure	INF - R7	Amend	The permitted activities do not protect natural values.	Include standard that this must also meet the permitted standards of the ECO, ONFL, CE, EW, and NC chapters.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.149	Infrastructure	INF - R8	Amend	The permitted activities do not protect natural values.	Include standard that this must also meet the permitted standards of the ECO, ONFL, CE, EW, and NC chapters.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.150	Infrastructure	INF - R9	Amend	The permitted activities do not protect natural values.	Include standard that this must also meet the permitted standards of the ECO, ONFL, CE, EW, and NC chapters.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.151	Infrastructure	INF - R10	Amend	The permitted activities do not protect natural values.	Include standard that this must also meet the permitted standards of the ECO, ONFL, CE, EW, and NC chapters.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.152	Infrastructure	INF - R11	Amend	The permitted activities do not protect natural values.	Include standard that this must also meet the permitted standards of the ECO, ONFL, CE, EW, and NC chapters.

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Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.153	Infrastructure	INF - R12	Amend	The permitted activities do not protect natural values.	Include standard that this must also meet the permitted standards of the ECO, ONFL, CE, EW, and NC chapters.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.154	Infrastructure	INF - R13	Amend	The controlled activities do not protect natural values.	Include requirement that this must also meet the permitted standards of the ECO, ONFL, CE, EW, and NC chapters.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.155	Infrastructure	INF - R14	Amend	The controlled activities do not protect natural values.	Include requirement that this must also meet the permitted standards of the ECO, ONFL, CE, EW, and NC chapters.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.156	Infrastructure	INF - R15	Amend	The controlled activities do not protect natural values.	Include requirement that this must also meet the permitted standards of the ECO, ONFL, CE, EW, and NC chapters.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.157	Infrastructure	INF - R16	Amend	The matters of discretion need to allow for consideration of natural values.	Amend the matters of discretion in each rule to include: - adverse effects on natural values, including those not yet identified on overlays, and the requirement to manage those effects in accordance with the Natural Environment and District Wide chapters of this Plan.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.158	Infrastructure	INF - R17	Amend	The matters of discretion need to allow for consideration of natural values.	Amend the matters of discretion in each rule to include: - adverse effects on natural values, including those not yet identified on overlays, and the requirement to manage those effects in accordance with the Natural Environment and District Wide chapters of this Plan.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.159	Infrastructure	INF - R18	Amend	The matters of discretion need to allow for consideration of natural values.	Amend the matters of discretion in each rule to include: - adverse effects on natural values, including

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Zealand Inc. (Forest & Bird) (S560)						those not yet identified on overlays, and the requirement to manage those effects in accordance with the Natural Environment and District Wide chapters of this Plan.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.160	Infrastructure	INF - R19	Amend	The matters of discretion need to allow for consideration of natural values.	Amend the matters of discretion in each rule to include: - adverse effects on natural values, including those not yet identified on overlays, and the requirement to manage those effects in accordance with the Natural Environment and District Wide chapters of this Plan.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.161	Infrastructure	INF - R20	Amend	The matters of discretion need to allow for consideration of natural values.	Amend the matters of discretion in each rule to include: - adverse effects on natural values, including those not yet identified on overlays, and the requirement to manage those effects in accordance with the Natural Environment and District Wide chapters of this Plan.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.162	Infrastructure	INF - R21	Amend	The matters of discretion need to allow for consideration of natural values.	Amend the matters of discretion in each rule to include: - adverse effects on natural values, including those not yet identified on overlays, and the requirement to manage those effects in accordance with the Natural Environment and District Wide chapters of this Plan.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.163	Infrastructure	INF - R22	Amend	The matters of discretion need to allow for consideration of natural values.	Amend the matters of discretion in each rule to include: - adverse effects on natural values, including those not yet identified on overlays, and the requirement to manage those effects in accordance with the Natural Environment and District Wide chapters of this Plan.
Royal Forest and Bird Protection	S560.164	Infrastructure	INF - R23	Amend	The matters of discretion need to allow for consideration of natural values.	Amend the matters of discretion in each rule to include:

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Society of New Zealand Inc. (Forest & Bird) (S560)						- adverse effects on natural values, including those not yet identified on overlays, and the requirement to manage those effects in accordance with the Natural Environment and District Wide chapters of this Plan.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.165	Infrastructure	INF - R24	Support		Retain
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.166	Infrastructure	INF - R25	Support		Retain
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.167	Infrastructure	INF - R26	Support		Retain
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.168	Infrastructure	INF - R27	Support		Retain
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.169	Infrastructure	INF - R28	Support		Retain
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.170	Transport	Overview	Amend	The scope and relationship of the chapter to other chapters is somewhat unclear.	Clarify the relationship between the transport provisions in this chapter and other district wide topic chapters.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.171	Transport	TRN	Oppose in part	See Key Issue above for submission points.	Where this chapters refers to biodiversity effects rather than including a different standard of effects management (e.g.,



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Zealand Inc. (Forest & Bird) (S560)						'minimising'), a specific requirement should be included to give effect to the ECO chapter provisions.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.172	Transport	TRN - O2	Oppose in part	Minimise is inappropriate.	Replace "minimise" with " <b>avoid, remedy or mitigate in accordance with the Natural Environment and District Wide chapters of this Plan.</b> "
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.173	Transport	TRN - R1	Amend	The permitted activity standards need to refer to the need to comply with rules elsewhere in the Plan, including ECO, NC, NFL, and CE, given the potential for adverse effects, and that this is not in NOSZ.	Add a standard to all PAs that requires adherence to PAs standards of other rules in the pan, including ECO, NC, NFL, and CE.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.174	Transport	TRN - R2	Amend	The permitted activity standards need to refer to the need to comply with rules elsewhere in the Plan, including ECO, NC, NFL, and CE, given the potential for adverse effects.	The permitted activity standards need to refer to the need to comply with rules elsewhere in the Plan, including ECO, NC, NFL, and CE, given the potential for adverse effects, and that this is not in NOSZ.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.175	Transport	TRN - R3	Amend	The permitted activity standards need to refer to the need to comply with rules elsewhere in the Plan, including ECO, NC, NFL, and CE, given the potential for adverse effects.	The permitted activity standards need to refer to the need to comply with rules elsewhere in the Plan, including ECO, NC, NFL, and CE, given the potential for adverse effects, and that this is not in NOSZ.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.176	Transport	TRN - R5	Amend	The permitted activity standards need to refer to the need to comply with rules elsewhere in the Plan, including ECO, NC, NFL, and CE, given the potential for adverse effects.	The permitted activity standards need to refer to the need to comply with rules elsewhere in the Plan, including ECO, NC, NFL, and CE, given the potential for adverse effects, and that this is not in NOSZ.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.177	Transport	TRN - R6	Amend	The permitted activity standards need to refer to the need to comply with rules elsewhere in the Plan, including ECO, NC, NFL, and CE, given the potential for adverse effects.	The permitted activity standards need to refer to the need to comply with rules elsewhere in the Plan, including ECO, NC, NFL, and CE, given the potential for adverse effects, and that this is not in NOSZ.
Royal Forest and Bird Protection Society of New	S560.178	Transport	TRN - R7	Amend	The matters of discretion do not provide the ability to consider adverse	Add matters of discretion: - <b>adverse effects on natural values, including those not yet identified on</b>

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Zealand Inc. (Forest & Bird) (S560)					environmental effects, including on indigenous biodiversity.	<b>overlays, and the requirement to manage those effects in accordance with the Natural Environment and District Wide chapters of this Plan.</b>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.179	Transport	TRN - R8	Amend	The matters of discretion do not provide the ability to consider adverse environmental effects, including on indigenous biodiversity.	Add matters of discretion: - <b>adverse effects on natural values, including those not yet identified on overlays, and the requirement to manage those effects in accordance with the Natural Environment and District Wide chapters of this Plan.</b>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.180	Transport	TRN - R9	Amend	The matters of discretion do not provide the ability to consider adverse environmental effects, including on indigenous biodiversity.	Add matters of discretion: - <b>adverse effects on natural values, including those not yet identified on overlays, and the requirement to manage those effects in accordance with the Natural Environment and District Wide chapters of this Plan.</b>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.181	Transport	TRN - R10	Amend	The matters of discretion do not provide the ability to consider adverse environmental effects, including on indigenous biodiversity.	Add matters of discretion: - <b>adverse effects on natural values, including those not yet identified on overlays, and the requirement to manage those effects in accordance with the Natural Environment and District Wide chapters of this Plan.</b>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.182	Transport	TRN - R11	Amend	The matters of discretion do not provide the ability to consider adverse environmental effects, including on indigenous biodiversity.	Add matters of discretion: - <b>adverse effects on natural values, including those not yet identified on overlays, and the requirement to manage those effects in accordance with the Natural Environment and District Wide chapters of this Plan.</b>
Royal Forest and Bird Protection	S560.183	Transport	TRN - R12	Amend	The matters of discretion do not provide the ability to consider adverse	Add matters of discretion: - <b>adverse effects on natural values,</b>

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Society of New Zealand Inc. (Forest & Bird) (S560)					environmental effects, including on indigenous biodiversity.	<b>including those not yet identified on overlays, and the requirement to manage those effects in accordance with the Natural Environment and District Wide chapters of this Plan.</b>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.184	Contaminated Land	Contaminated Land	Amend	Ensure that risks to the environment includes risks to native species and their habitat	Amend Objectives, polices and rules so environment explicitly includes risks to native species and their habitat
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.185	Hazardous Substances	Hazardous Substances	Amend	Ensure that risks to the environment includes risks to native species and their habitat	Amend Objectives, polices and rules so environment explicitly includes risks to native species and their habitat
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.186	Natural Hazards	Natural Hazards	Amend	Include in the rule framework, new objective, policy, and rules to ensure that habitat for indigenous biodiversity generally is protected, and that native species have somewhere to retreat to in the event their habitat is reduced or lost due to the impact of climate change.	<b>Add: Incorporate space for indigenous biodiversity values to be retained and enhanced;</b>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.187	Notable Trees	TREE	Support	Support whole chapter except as set out below.	Retain.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.188	Notable Trees	TREE - O1	Support in part	Habitat needs to be included. Notable trees are sometimes those that provide habitat to birds or bats.	Add <b>habitat</b>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.189	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori Rules	Support in part	The advice note refers to "identified rules" where consent will be required. It is not clear where or how these rules are "identified"	Amend to include a section setting out which other chapters of the Plan apply, in line with Key Issue above.

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Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.190	Sites and Areas of Significance to Māori	SASM -R7	Oppose in part	Condition/standard 3 would permit "other mineral extraction and quarrying activity". This activity is not appropriate for management under this rule, as it appears to not be related to aotea or pounamu.	Delete 3.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.191	Ecosystems and Indigenous Biodiversity	ECO	Amend	The matters set out in the Key Issues section above in this submission, under the heading "Identification and protection of SNAs" are also relevant to this chapter and may include amendments to address relief sought.	Amend as sought in Key Issues above.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.192	Ecosystems and Indigenous Biodiversity	Overview	Amend	There are a number of inaccuracies in the overview which detract from the utility of the introduction to provide a basis upon which to interpret the chapter.	Amend: ...Alongside this, parts of the West Coast/Te Tai o Poutini include the last habitats or strongholds of some native species threatened with extinction. <b>Without identification and protection there is a risk to diversity and intact systems as well as further degradation of already compromised ecosystems. Well-functioning ecosystems provide resilience to climate change and can provide protection to communities from natural hazards.</b>  Under the RMA, the district and regional councils share responsibility for maintaining indigenous biodiversity. Te Tai o Poutini Plan <del>is</del> <b>implements councils'</b> responsibility <del>to</del> for protecting and maintaining terrestrial (land-based) ecosystems, including the margins of the coast and waterbodies. <del>and</del> <b>The West Coast Regional Council is responsible for protecting and maintaining the non-terrestrial ecosystems (rivers, lakes, wetlands, and the coast below mean high water springs). Poutini Ngāi Tahu also have cultural responsibilities as mana whenua and kaitiaki. The RMA requires Te Tai o Poutini Plan to assist Councils in carrying out their</b>

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						<p><b>functions with respect to manage</b> indigenous biodiversity in two particular ways. <del>Firstly, the control of any actual or potential effects of the use, development, or protection of land for the purpose of maintaining indigenous biodiversity.</del> Secondly, it is required to recognise and provide for the protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna. <b>Specifically, to recognise and provide for the protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna; and more broadly, for the control of any actual or potential effects of the use, development, or protection of land for the purpose of maintaining indigenous biodiversity. The WCRPS, which this Plan must give effect to, sets out criteria for determining significance and requires that all areas meeting this criteria, whether mapped in the Plan or not, are to be known as Significant Natural Areas, or SNAs.</b></p> <p>Because of the <del>extremely large</del> <b>extensive</b> land areas covered by indigenous vegetation on the West Coast/Te Tai o Poutini, <del>detailed a comprehensive assessment of each piece of vegetation for identification of significance using the WCRPS Appendix 1 criteria for the purpose of mapping Significant Natural Areas</del> its significance has not yet been undertaken <b>completed</b>.</p> <p>In the Grey District, an evaluation process <del>has been underway for</del> <b>was undertaken</b> a number of years <b>ago. This identified, and this has enabled</b> 37 Significant Natural Areas <b>previously included in the Grey District Plan. These</b></p>

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						<p><b>areas remain identified as SNAs</b> to be identified within the Grey District. The list of these Significant Natural Areas can be found <b>included</b> in Schedule Four and they are also shown on the maps. <b>Where the provisions in this Plan refer to Significant Natural Areas this includes areas which are not yet included as SNA in Schedule Four, that nevertheless meet one or more of the significance criteria. Where there is uncertainty as to whether an area may meet the criteria, or in the absence of an ecological assessment, precaution and protection should be favoured, and a resource consent sought.</b></p> <p>In the Buller and Westland Districts, where Significant Natural Areas have not yet been mapped, <b>and in Grey District for areas outside of mapped SNAs included in Schedule Four</b>, Te Tai o Poutini Plan has general vegetation clearance rules, with an expectation that an assessment against the regionally consistent significance criteria will be undertaken at the time of any resource consent. <b>It is expected that further areas will be identified and mapped as Significant Natural Areas through resource consent processes or Council supported ecological assessments and that these will be added to the Plan through subsequent Plan change processes. ...</b></p>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.193	Ecosystems and Indigenous Biodiversity	Plantation Forestry	Amend	Explanation of the relationship with the NPS for Plantation Forestry is supported as is the inclusion of more stringent provisions in the Plan for protection of significant biodiversity.	Amend: <b>Plantation Forestry</b> Plantation forestry is principally regulated ... stringent to protect <del>s</del> Significant <del>n</del> Natural <del>a</del> Areas and significant indigenous biological diversity

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					Some changes for clarification to this explanation is needed.	within the coastal environment as provided for in the NZCPS Policy 11. Where provisions within this chapter <b>are more stringent, they</b> over-rule the requirements of the NES - PF; an advice note to that effect is included within the <b>relevant</b> Rule."
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.194	Ecosystems and Indigenous Biodiversity	Overview	Oppose	It is not clear why this statement is only included in the ECO chapter overview and not the overview of other chapters.	Delete this statement.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.195	Ecosystems and Indigenous Biodiversity	Wetlands on the West Coast	Amend	It would be helpful to explain that the National Environmental Standards for Freshwater, regulations, include setbacks which are different to those in this Plan, and which may require consent to be sought from the Regional Council.	Amend: <b>Wetlands on the West Coast The National Environmental Standards for Freshwater Management includes regulations for activities within, and within setbacks from, natural wetlands. These activities are managed by the West Coast Regional Council under the NES for Freshwater regulations. It should be noted that the setbacks for activities within those regulations may be different to those set out in this Plan and may require resource consent to be sought from the regional council.</b> The West Coast Regional Council Land and Water Plan identifies ..... <del>They are also subject to regulation by the West Coast Regional Council under the National Environmental Standard for Freshwater Management</del> which also has regulations around how other wetlands can be managed.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.196	Ecosystems and Indigenous Biodiversity	ECO- 01	Amend	To give effect to Objective 7.1 and Policy 7.1.a) of the WCRPS it is necessary for Significant Natural Areas to be mapped. There should be a clear objective to map SNAs within a reasonable timeframe.	To identify and protect areas of significant indigenous vegetation and significant habitats of indigenous fauna on the West Coast/Te Tai o Poutini, <b>including mapping of Significant Natural Areas consistently across all districts and including these areas in</b>

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						<b>Schedule Four by 2025.</b>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.197	Ecosystems and Indigenous Biodiversity	ECO- O2	Amend	The obligation is to protect significant and maintain other biodiversity. Subdivision and development within a Significant Natural Area should not be predetermined as "appropriate" to be provided for in this way, which is different to the wording of s6(c). It may be appropriate to consider limited activities where protection is achieved.	Amend ECO - O2: "To <b>only consider</b> provision <del>de</del> for <del>appropriate</del> subdivision, use and development within areas of significant indigenous vegetation and significant habitats of indigenous fauna where the values of the area can be maintained <del>or enhanced</del> <b>and the area is protected.</b> "
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.198	Ecosystems and Indigenous Biodiversity	ECO- O3	Amend	As noted above, Forest & Bird supports the Plan giving effect to ss6(e), 7(a) and 8. We are concerned that as drafted, this objective may not clearly provide for s6(c).	Amend to ensure that SNAs are protected, for example by the following wording:  "To provide for tino rangatiratanga in relation to <del>management</del> <b>protection of Significant Natural Areas</b> of significant indigenous vegetation and significant habitats of indigenous fauna where these are located on Poutini Ngāi Tahu and Te Rūnanga o Ngāi Tahu land."
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.199	Ecosystems and Indigenous Biodiversity	ECO- O4	Amend	The council's obligation is to control land use for the purpose of maintaining indigenous biodiversity across the district, not just the range and diversity. The objective lacks direction to maintain the extent of biodiversity.	Amend: To maintain the range and diversity <b>and extent</b> of ecosystems and indigenous species found on the West Coast/Te Tai o Poutini.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.200	Ecosystems and Indigenous Biodiversity	ECO - P1	Amend	Amendments are also needed to terminology consistent with the policy direction and the WCRPS definition for "Significant Natural Area, or SNA" as explained in amendments to the ECO chapter overview.	Amend policy to include Grey District SNA mapping to be assessed under the WCRPS criteria.  Amend ECO - P1: "Identify <b>and map areas of sSignificant Natural Areas, by indigenous vegetation and fauna habitat. In the Grey District these areas are identified in Schedule Four; in the Buller and Westland Districts:</b>



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						<p>i. <del>Using the</del> criteria set out in Appendix 1 of the West Coast Regional Policy Statement <del>will be used to assess</del> <b>determine</b> significance; ii. <b>In Grey (beyond SNAs included in Schedule Four) and in Buller and Westland, Significant Natural</b> Areas of significant indigenous vegetation and fauna habitat will be identified through the resource consent process <del>until such time as district wide identification and mapping of significant natural areas is undertaken</del>; iii. <b>in Grey (including SNAs currently included in Schedule Four)</b>, Buller and Westland <del>a</del> district wide assessment, identification and mapping of significant natural areas will be undertaken <b>in a regionally consistent manner</b> and completed by June 2025; and iv. <b>the addition of Identified and mapped Significant Natural Areas</b> of significant indigenous vegetation and fauna habitat <del>will be added</del> to Schedule Four through a Plan Change <b>by 2025.</b>"</p>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.201	Ecosystems and Indigenous Biodiversity	ECO - P2	Amend	While it is Planning practice to generally not include permitted activity status unless there is certainty that adverse effects will be no more than minor, this is not an appropriate policy direction where protection of Significant Natural Areas is to be achieved.	Delete ECO- P2 and replace with Chapter 7 Policy 2 to 6 of the WCRPS.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.202	Ecosystems and Indigenous Biodiversity	ECO - P3	Amend	Clause a. of ECO-P3 would not necessarily achieve the obligation required under the RMA to protect SNAs. Additional housing next to SNAs also brings with it potential for increased adverse effects. the term enhancement is often used in the context of biodiversity offsets and compensation which is not appropriate	Amend: Encourage the protection, <del>enhancement</del> , and restoration of significant indigenous biodiversity <del>by when:</del> a. <del>Allowing</del> <b>considering</b> additional subdivision rights if an area of significant indigenous vegetation or significant habitat of indigenous fauna within the same property is legally protected as part of the subdivision; <b>x. considering subdivision proposal</b>

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					here. Protection and restoration are appropriate considerations for all subdivision, not just additional lots.	<b>proposals of land that includes or lies adjacent to a Significant Natural Area;</b> b. Promoting the creation of connections and ecological corridors between <b>Significant Natural Areas of significant indigenous biodiversity;</b> Promoting the use of eco-sourced species from the relevant ecological district; Supporting opportunities for Poutini Ngāi Tahu to exercise their cultural rights and responsibilities as mana whenua and kaitiaki in restoring, protecting, and enhancing <b>Significant Natural Areas of significant indigenous biodiversity;</b> and e. Supporting initiatives by landowners, community groups and others to protect, restore and maintain <b>Significant Natural Areas of significant indigenous biodiversity.</b>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.203	Ecosystems and Indigenous Biodiversity	ECO - P4	Amend	While we generally agree that eco-tourism that complements protection is better than that which does not, it is not clear what "complement" means, and this could be subjective.	Amend ECO-P4  " <b>Consider P</b> provideing for eco-tourism activities that: <del>complement the</del> <b>protection Significant Natural Areas in accordance with Chapter 7, Policies 2 to 6 of the WCRPS on; or and</b> enhancement of <del>areas of significant indigenous biodiversity;</del> <b>vegetation or significant habitats of indigenous fauna;</b> and contribute to the vitality and resilience of the economy and wellbeing of the community.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.204	Ecosystems and Indigenous Biodiversity	ECO - P5	Amend	There is some uncertainty in the policy as to what "minimise" will involve and what "significant values" are and whether protection of SNAs will be achieved.	Amend: Enable the use of Māori Purpose Zoned land with areas of indigenous vegetation and indigenous fauna habitat, where land use and subdivision is consistent with tikanga and mātauranga Māori and <del>minimises</del> <b>adverse effects are managed in accordance with Chapter 7, Policies 2 to 5</b>

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						<del>of the WCRPS on any significant values of the vegetation or fauna habitat.</del>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.205	Ecosystems and Indigenous Biodiversity	ECO - P6	Amend	We support the clear direction to avoid certain effects. However, the policy takes a different approach to activities with respect to the matters set out and uses different wording than the similar Policy 2 in Chapter 7 of the WCRPS. This creates uncertainty and potential inconsistencies with giving effect to the WCRPS.	Delete ECO - P6, and replace with the exact wording of Policy 2, Chapter 7 of the WCRPS.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.206	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity Policies	Support	The Plan does not give effect to Chapter 7 WCRPS, in particular policies 2-5.	Insert new policies in the ECO chapter to directly replicate Chapter 7, policies 2-5 WCRPS.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.207	Ecosystems and Indigenous Biodiversity	ECO - P7	Amend	Changes are required to ensure that the WCRPS is given effect to in this policy.	Amend Policy ECO- P7:  "When assessing resource consents in <b>or adjacent to areas of s</b> Significant <b>Natural Areas</b> indigenous vegetation and significant habitats of indigenous fauna, <b>apply Chapter 7, Policies 2-6 WCRPS. To the extent that it is consistent with those policies</b> , also consider the following matters: ... .
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.208	Ecosystems and Indigenous Biodiversity	ECO - P8	Amend	While the matters set out are generally considered to be appropriate considerations, they should be in addition, and not as an alternative, to those set out in Policy 8, Chapter 7 of the WCRPS.	Add the exact wording of Policy 8 of the WCRPS into this policy while retaining proposed wording
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.209	Ecosystems and Indigenous Biodiversity	ECO - P9	Amend	This policy does not give effect to the WCRPS.	Delete ECO - P9, Replace with the exact wording of Policy 2, 3, 4 and 5, Chapter 7 of the WCRPS or incorporate those policies by reference.

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Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.210	Ecosystems and Indigenous Biodiversity	ECO - P10	Oppose	To the extent that Appendix 1 criteria of the WCRPS could be broader than Policy 11 matters, other ECO provisions must also be applied in the coastal environment in the absence of policy direction avoiding significant adverse effects.	Add the WCRPS definition for "Significant indigenous biological diversity". Ensure that the term as used in ECO-P10 is hyperlinked to the definition.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.211	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity Policies	Amend	A new policy is required to give effect to Policy 8 of the WCRPS. This policy can be added directly from the WCRPS or could be included by reference.	Add: <b>Maintain indigenous biological diversity, ecosystems, and habitats in the region by: Recognising that it is more efficient to maintain rather than to restore indigenous biological diversity; Encouraging restoration or enhancement of indigenous biological diversity and/or habitats, where practicable; and Advocating for a co-ordinated and integrated approach to reducing the threat status of indigenous biological diversity.</b>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.212	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity Rules	Amend	The Plan currently does not protect significant habitats of indigenous fauna where they occur outside indigenous vegetation. This is in the context of this Plan not having identified SNAs.	As noted above in the Key Issues, we have not been able to suggest a satisfactory amendment to ensure that significant habitats outside of indigenous vegetation are protected. As such, we seek that the Council provide new rules to ensure that this occurs.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.213	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity Rules	Support	It is helpful to include note for consideration of policy that is relevant to activities which are specifically considered in the ECO rules.	Retain the note to refer to policies in the Energy, Infrastructure and Transport chapters
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.214	Ecosystems and Indigenous Biodiversity	Note:	Amend	The relationship between the maps and Schedule Four should be clarified.	Add a note to the effect that Schedule Four SNAs are spatially identified on the Planning maps under the Significant Natural Area overlay.

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Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.215	Ecosystems and Indigenous Biodiversity	Permitted Activities	Amend	Due to the lack of SNAs comprehensively identified, scheduled, and mapped in the Plan, Forest & Bird considers that indigenous vegetation clearance must be treated as if it were occurring within an SNA. The type of activities needs to be limited to those that may be appropriate as permitted within an SNA, and to a scale that ensures the SNA is protected and that adverse effects are no more than minor. For clarity we consider that separate rules should be used for activities outside of Schedule Four SNAs to those within Schedule Four SNAs. Within the CE even more stringent conditions are required to ensure that the policies direction to avoid adverse effects is achieved.	Make amendments to address submission. We have sought rules below which attempt to fix this.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.216	Ecosystems and Indigenous Biodiversity	ECO - R1	Oppose	Delete ECO - R1 or amend so that all indigenous vegetation clearance across all districts and is only for purposes, and within limits, that are appropriate as permitted activities to protect Significant Natural Areas, including where such areas have not yet been identified in the Plan, as follows	Delete ECO - R1
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.217	Ecosystems and Indigenous Biodiversity	ECO - R2	Oppose	It is uncertain whether ECO-R2 will give effect to Policy 11 of the NZCPS, WCRPS or proposed ECO policies, to avoid adverse effects and significant adverse effects on indigenous biodiversity.	Delete ECO - R2
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.218	Ecosystems and Indigenous Biodiversity	ECO - R3	Oppose	A controlled activity status limits the matters that council can consider and does not provide sufficient discretion for council to decline consent where that may be necessary and appropriate.	Delete ECO-R3

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Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.219	Ecosystems and Indigenous Biodiversity	ECO - R4/SUB - R7	Amend	The rule heading suggests that the purpose of the subdivision is to contain an SNA rather than to capture any subdivision on a site which contains a Significant Natural Area or part of such an area.	<p>1. Amend: Subdivision of Land to Create Allotments <del>on a site with-Containing an Area of a Significant Natural Area Indigenous Biodiversity</del></p> <p>Activity Status: Controlled Where:  <b>X. An assessment of the site against the significance criteria in Appendix 1 of the WCRPS is provided with the application and applicant can demonstrate the adequacy of this assessment; and</b> 1...3. The subdivision will not result in buildings or access ways being located within the identified area of significant indigenous biodiversity or the need for clearance of significant indigenous vegetation to provide for a future <b>building site or future</b> access to any site; and  4. Subdivision standards S2-S11 are complied with.  Matters of control are:  a. ...;  <b>x. the inclusion of covenants on the titles including for the location of residential building platforms and access;</b>  b. ...d. The measures to <del>minimise</del> <b>avoid, remedy, or mitigate</b> any adverse effects on:  i. The significant indigenous biodiversity; ii. The cultural significance to Poutini Ngāi Tahu. ...</p>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.220	Ecosystems and Indigenous Biodiversity	ECO - R5	Amend	Given the deletion of ECO-R3 and incorporation of those activities in to ECO-R5 which Forest & Bird seeks above there is no need to refer to compliance with controlled rules in the rule heading.	1. Amend ECO - R5 as follows: Indigenous vegetation clearance not meeting Permitted <del>Rule ECO-R1 or Controlled Activity Standards</del>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.221	Ecosystems and Indigenous Biodiversity	ECO - R6/SUB - R9	Amend	The rule is similar to ECO - R4 and requires similar amendments for the same reasons.	Amend: Subdivision of Land to create Allotments <del>on a site with-Containing an Area of a Significant Natural Area Indigenous Biodiversity</del>

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Zealand Inc. (Forest & Bird) (S560)						<p>Biodiversity not meeting Rule ECO - R4 Activity Status Restricted Discretionary Where: <b>X. An assessment of the site against the significance criteria in Appendix 1 of the WCRPS is provided with the application and applicant can demonstrate the adequacy of this assessment; and</b></p> <p>1. ...3. The subdivision will not result in buildings or access ways being located within any Significant Natural Area <del>identified in Schedule Four</del> <b>or the need for clearance of significant indigenous vegetation to provide for a future building site or future access to any site</b>; and Subdivision standards S2-S11 are complied with.</p> <p>Discretion is restricted to:</p> <p>a. ....b. ... <b>x. the inclusion of covenants on the title including for the location of residential building platforms and access;</b></p> <p>c. ... e. The measures to <del>minimise</del> <b>avoid, remedy, or mitigate</b> any adverse effects on: ...</p>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.222	Ecosystems and Indigenous Biodiversity	ECO - R7	Amend	To ensure protection of significant natural areas that are not yet identified in the Plan an assessment against the WCRPS Appendix 1 significance criteria is required.	Amend: <b>Where: 1. An assessment in accordance with Appendix 1 of the WCRPS demonstrates that the clearance and disturbance is not within a Significant Natural Area(s).</b>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.223	Ecosystems and Indigenous Biodiversity	ECO - R8/SUB - R15	Amend	The rule heading needs clarification for the reasons set out at ECO - R4/SUB - R6. Other consequential amendments are also required to use the WCRPS defined term Significant Natural Area and to clarify rules that apply where compliance is not achieved.	Amend Rule ECO - R8/SUB - R15 as follows "Subdivision of Land to Create Allotments <b>on a site with</b> <del>Containing an Area of a Significant Natural Area</del> <b>Indigenous Biodiversity</b> not meeting Rule ECO - R6 Activity Status Discretionary Where: The <b>Significant Natural Area</b> <del>area of significant indigenous biodiversity</del> is legally protected in perpetuity by way of a conservation

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						covenant with an authorised agency and is contained within a single allotment; The subdivision will not result in buildings or accessways being located within any Significant Natural Area identified in Schedule Four; and 3. Subdivision Standards S2 - S11 are complied with. Activity status where compliance not achieved: Non-complying <b>under ECO - R9/SUB - R27.</b> "
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.224	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity Rules	Amend	For the reasons set out in respect of ECO-R7 above.	As sought with respect to amendments on ECO- R7, add a new ECO - Noncomplying rule for vegetation clearance not meeting new rule ECO - R7A as well as for vegetation clearance within Significant Natural Areas (including Schedule Four areas) for activities that are not specifically provided for in other ECO rules
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.225	Ecosystems and Indigenous Biodiversity	ECO - R9/SUB - R27	Amend	A non-complying activity status is appropriate to indicate that indigenous vegetation clearance not already provided for subdivision activities would not be anticipated within Significant Natural Areas.	Retain Rule ECO - R9/SUB - R27 with the following amendments: Subdivision of Land within <del>an Area of a</del> Significant <b>Natural Area</b> <del>Indigenous Biodiversity</del> not meeting Rule ECO - R8.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.226	Ecosystems and Indigenous Biodiversity	ECO - R10	Amend	Considering allowing these activities would be contrary to the regional pest Plan and therefore the Biosecurity Act.	Amend ECO - R10 so that it is a prohibited activity
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.227	Ecosystems and Indigenous Biodiversity	ECO - R11	Support in part	Considering allowing these activities would be contrary to the regional pest Plan and therefore the Biosecurity Act.	Amend ECO - R11 so that it is a prohibited activity.
Royal Forest and Bird Protection Society of New	S560.228	Natural Features and Landscapes	NFL	Support	Support the approach of dealing with vegetation clearance in ONFLs in the ECO chapter.	Retain approach of dealing with vegetation clearance in ECO chapter.



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Zealand Inc. (Forest & Bird) (S560)						
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.229	Natural Features and Landscapes	NFL	Support	Support the clear way other relevant chapters are referred to here. Also see Key Issues above for submission on this issue.	Retain method of referring to other chapters clearly.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.230	Natural Features and Landscapes	NFL - P2	Amend	As discussed above in the Key Issues, F&B is not aware of an accepted approach to offsetting landscape effects. As such, it is not clear how the Council will ensure that this is an appropriate method to manage adverse effects in accordance with higher order documents and the Act.	Where possible, avoid <del>significant</del> adverse effects on the values that contribute to outstanding natural landscapes described in Schedule Five and outstanding natural features described in Schedule Six. Where <del>significant</del> adverse effects cannot be avoided, ensure that the adverse effects are remedied, mitigated <del>or offset.</del>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.231	Natural Features and Landscapes	NFL - P5	Amend	A direction to minimise effects is inconsistent with the WCRPS and s6(b) direction to protect ONFLs. It also does not give effect to the objective.	Amend as follows: <b>When determining whether a proposal for land use or subdivision is appropriate, in addition to the above policies, consider the following matters:</b> <del>Minimise adverse effects on outstanding natural landscapes and outstanding natural features by considering the following matters when assessing proposals for land use or subdivision</del>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.232	Natural Features and Landscapes	NFL	Support	Support the references in the rules that any vegetation clearance associated with the various activities is subject to the provisions in the ECO chapter.	Retain references.
Royal Forest and Bird Protection Society of New	S560.233	Natural Features and Landscapes	NFL - R3	Oppose	This is not an appropriate activity to be permitted or controlled, given the potentially significant effects on the ONFL.	Delete permitted and controlled activities and require restricted discretionary consent.

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Zealand Inc. (Forest & Bird) (S560)						
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.234	Natural Features and Landscapes	NFL - R9	Oppose	This is not an appropriate activity to be permitted or controlled, given the potentially significant effects on the ONFL.	Delete permitted and controlled activities and require restricted discretionary consent.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.235	Natural Features and Landscapes	NFL - R6	Amend	This rule needs the reference included in other rules that any vegetation clearance associated with the EW will must comply with ECO chapter provisions.	Amend to include a standard that requires compliance with the ECO provisions for any associated vegetation clearance.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.236	Natural Features and Landscapes	NFL - R8	Amend	This rule needs the reference included in other rules that any vegetation clearance associated with the EW will must comply with ECO chapter provisions.	Amend to include a standard that requires compliance with the ECO provisions for any associated vegetation clearance.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.237	Natural Features and Landscapes	NFL - R10	Amend	This rule needs the reference included in other rules that any vegetation clearance associated with the EW will must comply with ECO chapter provisions.	Amend to include a standard that requires compliance with the ECO provisions for any associated vegetation clearance.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.238	Natural Features and Landscapes	NFL - R11	Oppose in part	This rule needs the reference included in other rules that any vegetation clearance associated with the EW will must comply with ECO chapter provisions.	Amend to include a standard that requires compliance with the ECO provisions for any associated vegetation clearance.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.239	Natural Features and Landscapes	NFL - R12	Amend	This rule needs the reference included in other rules that any vegetation clearance associated with the EW will must comply with ECO chapter provisions.	Amend to include a standard that requires compliance with the ECO provisions for any associated vegetation clearance.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.240	Natural Features and Landscapes	NFL - R13	Oppose	This activity should be non-complying, given the significant adverse effects associated with the activity.	Amend to make activity non-complying.
Royal Forest and Bird Protection	S560.241	Natural Features and Landscapes	NFL - R14	Amend	This rule needs the reference included in other rules that any vegetation	Amend to include a standard that requires compliance with the ECO provisions for any

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Society of New Zealand Inc. (Forest & Bird) (S560)					clearance associated with the EW will must comply with ECO chapter provisions.	associated vegetation clearance.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.242	Natural Features and Landscapes	NFL - R15	Amend	This rule needs the reference included in other rules that any vegetation clearance associated with the EW will must comply with ECO chapter provisions.	Amend to include a standard that requires compliance with the ECO provisions for any associated vegetation clearance.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.243	Natural Character and Margins of Waterbodies	NC	Oppose	Forest & Bird makes a number of overarching submissions in relation to this chapter:	The whole chapter needs to be revised in line with submission points:  1. The rules should be at least as, if not more, stringent than the rules governing vegetation clearance in the ECO chapter (as amended by our submission). The margins of wetlands, lakes and rivers must be protected in accordance with both s6(a) and potentially s6(c). The objectives and policies only appear to deal with s6(a), it needs to be made clear that the objectives and policies of the ECO chapter will also apply, as these deal with s6(c) matters.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.244	Natural Character and Margins of Waterbodies	Overview	Amend	There needs to be a much clearer statement about the relationship between this chapter and the regulations for wetlands in the NESFM.	Amend overview to include a much more detailed and clear explanation of relationship with NESFM, and activities regulated by NESFM, in line with submission points. Also include an explanation of how any wetland provisions in this chapter apply over and above the NESFM regulations.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.245	Natural Character and Margins of Waterbodies	NC - O1	Amend	The objective does not accurately reflect the requirements of the RMA and the WCRPS.	Delete and Replace: <b>Protect the natural character of wetlands, lakes and rivers and their margins, from inappropriate subdivision, use and development.</b>

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Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.246	Natural Character and Margins of Waterbodies	NC - O2	Support		Retain
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.247	Natural Character and Margins of Waterbodies	NC - O3	Oppose	Activities that have a functional need are not necessarily appropriate, these activities still need to be managed so that the natural character is preserved.	Delete
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.248	Natural Character and Margins of Waterbodies	NC - P1	Oppose in part	'Minimising' adverse effects is not an appropriate approach to effects management.	Amend: <b>Avoid</b> <del>Minimise</del> the adverse effects of activities on the natural character of the riparian margins of lakes, rivers, and wetlands by ensuring that subdivision, <b>development</b> and land use maintains the elements, patterns and processes that contribute to their natural character.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.249	Natural Character and Margins of Waterbodies	NC - P2	Oppose	This policy is completely contrary to the requirements of s6(a) and (c).	Delete.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.250	Natural Character and Margins of Waterbodies	NC - P3	Oppose	This policy is contrary to s6(a) and (c).	Delete.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.251	Natural Character and Margins of Waterbodies	NC - P4	Support	Support this policy.	Retain.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.252	Natural Character and Margins of Waterbodies	Natural Character and the Margins of Waterbodies Rules	Amend	As submitted above, these rules duplicate, and are more lenient than, rules in the ENSFM regarding works in or adjacent to natural wetlands.	Review all rules in this chapter to remove duplications for natural wetlands rules in NESFM. Include rules to protect all other wetlands meeting the RMA definition of wetland, which are not covered by 'natural wetlands'.

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Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.253	Natural Character and Margins of Waterbodies	NC - R1	Oppose	These activities are not appropriate in the margins of waterbodies. The standards do not ensure that the natural character (or the biodiversity values) of the waterbody and its margins will be preserved and protected.	Delete, and amend to at least discretionary.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.254	Natural Character and Margins of Waterbodies	NC - R2	Oppose	These activities are not appropriate in the margins of waterbodies. The standards do not ensure that the natural character (or the biodiversity values) of the waterbody and its margins will be preserved and protected.	Delete, and amend to at least discretionary.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.255	Natural Character and Margins of Waterbodies	NC - R3	Oppose	This rule doesn't include any standards to ensure that natural character is preserved. Consent should be required to ensure the Council can manage effects.	Delete, and amend to at least discretionary.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.256	Natural Character and Margins of Waterbodies	NC - R3	Amend	Support at least a discretionary consent requirement for all works in riparian margins, only insofar as: - this doesn't duplicate, or is more stringent than NESFM rules;	Retain at least a discretionary consent requirement for activities in riparian margins, but ensure that: The rules are not more lenient than the NESFM for natural wetlands The rules are not more lenient than the ECO or EW rules (as amended by our submission.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.257	Natural Character and Margins of Waterbodies	NC - R4	Amend	Support at least a discretionary consent requirement for all works in riparian margins, only insofar as: - this doesn't duplicate, or is more stringent than NESFM rules;	Retain at least a discretionary consent requirement for activities in riparian margins, but ensure that: The rules are not more lenient than the NESFM for natural wetlands The rules are not more lenient than the ECO or EW rules (as amended by our submission.
Royal Forest and Bird Protection	S560.258	Natural Character and	NC - R5	Amend	Support at least a discretionary consent requirement for all works in riparian	Retain at least a discretionary consent requirement for activities in riparian margins,

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Society of New Zealand Inc. (Forest & Bird) (S560)		Margins of Waterbodies			margins, only insofar as: - this doesn't duplicate, or is more stringent than NESFM rules;	but ensure that: The rules are not more lenient than the NESFM for natural wetlands The rules are not more lenient than the ECO or EW rules (as amended by our submission.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.259	Natural Character and Margins of Waterbodies	NC	Amend	The rules do not give effect to P4.	Include new method or rule to give effect to P4.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.260	Financial Contributions	Financial Contributions	Amend	The approach inherent in this chapter to using financial contributions to manage adverse effects needs to be reconsidered.	Reconsider approach in this chapter and make amendments. It must be clear that the obligation to manage adverse effects lies with the consent applicant. In particular, any provisions that provides for the payment of a financial contribution for biodiversity effects, or landscape effects, must be deleted.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.261	Financial Contributions	FC - P6	Oppose	This is contrary to WCRPS and RMA requirements regarding effects management.	Delete
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.262	Financial Contributions	FC - R1	Oppose	This suggests that the consent applicant does not have to adequately manage adverse effects in line with the rest of the Plan's provisions.	Delete i and ii.,
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.263	Financial Contributions	FC - R12	Oppose	This is contrary to requirement to manage effects in accordance with the RMA, WCRPS, NZCPS, and the other requirements of this Plan.	Delete
Royal Forest and Bird Protection Society of New	S560.264	Subdivision	Overview	Amend	Amend to make clear that subdivision needs to protect not only scheduled/identified areas, particularly	Amend to make clear that subdivision needs to protect not only scheduled/identified areas, particularly given the lack of a comprehensive

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Zealand Inc. (Forest & Bird) (S560)					given the lack of a comprehensive SNA schedule.	SNA schedule.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.265	Subdivision	Subdivision Objectives	Amend	It is not clear that the provisions, and especially the rules, of this chapter adequately protect wetlands. These must be protected in accordance with chapter NC (as well as ECO).	Amend provisions of this chapter to ensure wetlands are protected in accordance with s6(a) and the NC chapter (as amended by our submission). Consider including new rules, or amendments to existing rules to avoid effects on waterbodies and their margins in the subdivision process, in a similar way as is sought for SNAs below.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.266	Subdivision	Subdivision Rules	Amend	It is not clear if a boundary adjustment could adversely affect a significant natural area.	Add a condition or rule that ensures the subdivision rules (other than the ECO/SUB rules) apply outside of Significant Natural Areas, such as a requirement that an assessment in accordance with Appendix 1 of the WCRPS demonstrates that the clearance and disturbance is not within a Significant Natural Area(s).
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.267	Subdivision	SUB - R5	Amend	Condition 1 needs to exclude all Significant Natural Areas consistent with the approach taken in ECO - R4/SUB - R7.	Amend:1. This is not within a Significant Natural Area <del>as identified in Schedule Four</del> <b>and is</b> subject to Rule SUB - R7;
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.268	Subdivision	SUB - R6	Amend	Condition 1 suggests that SUB - R7/ECO - R4 does not apply to an Area of Significant Indigenous Biodiversity beyond that identified as SNA in Schedule Four.	Amend Condition 1 Where: 1. <b>an ecological assessment shows</b> <del>that</del> this is not within a Significant Natural Area, <b>or an SNA</b> as identified in Schedule Four, <del>and</del> subject to Rule SUB - R7;
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.269	Subdivision	SUB - R7/ECO - R4	Support in part	For the reasons set out at ECO - R4/SUB - R7	Amend as sought for ECO-R4

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Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.270	Subdivision	SUB - R9/ECO - R6	Amend	For the reasons set out at ECO - R6/SUB - R9	Amend as sought for ECO-R6
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.271	Subdivision	SUB - R15/ECO - R8	Amend	For the reasons set out at ECO - R8/SUB - R15	Amend as sought for ECO-R8
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.272	Subdivision	SUB - R19	Amend	Subdivision within the Natural Open Space Zone would not generally be appropriate and should not be anticipated by the Plan. A non-complying activity status is more appropriate.	Amend SUB - R19 to exclude NOSZ Add a new SUB non-complying rule for subdivision in the NOSZ.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.273	Subdivision	SUB - R27/ECO - R9	Amend	For the reasons set out at ECO - R9/SUB - R27	Amend as sought for ECO-R9. Amend to identify that the rule applies where SUB - R27 is not met.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.274	Subdivision	SUB - S2	Amend	It is not certain that the location of building platforms and access will remain outside of significant natural areas once subdivision is completed.	Add a requirement for an indicative building platform and access to be identified for any allotment with a Significant Natural Area, on subdivision applications and for this to be confirmed in a covenant on the title.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.275	Subdivision	SUB - S9	Amend	The esplanade strips need a clearer calculation. Width should be determined either over the length of the river adjacent to the subdivision and as relevant to the width of the river.	Amend: c. The bank of a river whose bed has an average width of 3m <b>or more, for the river or when calculated for the length/distance of the bed adjoining the allotment(s) of the subdivision.</b>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.276	Activities on the surface of water	ASW	Amend	A permissive approach to non-commercial motorised craft, however, is concerning as managing the cumulative adverse effects is nigh on impossible.	Consider including more lakes, rivers, and lagoons to the list in ASW - R2 clause 1 to ensure that natural values are adequately protected.



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Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.277	Coastal Environment	Overview	Amend	The overview statement says the Plan achieves the NZCPS by identifying and mapping a Coastal Environment overlay. However, that mapping is incomplete. Nor are the coastal overlays sufficient to give effect to the NZCPS.	Amend the CE-Overview to clarify the approach taken to mapping the coastal environment with reference to the Planning map overlay. If that overlay is updated as sought in this submission to fully identify the extent of CE consistent with Policy 1 of the NZCPS then reference to the maps can be relied on. However, if that identification of extent has not been included then reference to coastal areas meeting Policy 1 of the NZCPS should be included in the overview explanation.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.278	Coastal Environment	CE - O1	Amend	The Objective is worded inappropriately to give effect to the NZCPS and to achieve the purpose of the Act.	Amend: "To preserve the natural character, landscapes and biodiversity of the coastal environment <del>while enabling people and communities to provide for their social, economic and cultural wellbeing in a manner appropriate for the coastal environment.</del> "
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.279	Coastal Environment	CE - O3	Oppose in part	The Objective is worded inappropriately to give effect to the NZCPS.	Amend CE - O3 as follows: "To <b>consider</b> providing <del>e-</del> for activities which have a functional need to locate in the coastal environment <del>in such a way that where</del> the impacts on natural character, landscape, natural features, access, and biodiversity values are <b>appropriately avoided, remedied or mitigated</b> <del>minimised</del> ."
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.280	Coastal Environment	CE - P1	Amend	The policy does not capture all relevant aspects of Policy 1 NZCPS. For example, it fails to include coastal vegetation and the habitat of indigenous coastal species including migratory birds.	Amend the policy to accurately reflect Policy 1 as it applies to the coastal environment beyond the coastal marine area.

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Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.281	Coastal Environment	CE - P2	Amend	The Policy fails to include all aspects of Policies 13 and 15 where preservation is to be achieved as set out in the NZCPS.	Amend CE - P2 to accurately capture Policies 13 and 15 of the NZCPS.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.282	Coastal Environment	CE - P3	Oppose in part	The policy does give effect to Policies 13 and 15 of the NZCPS. The policy is specific to overlays for outstanding and high areas but also seems to provide direction for managing adverse effects on natural character, landscapes, and features beyond those overlays.	Amend CE - P3: "Only <b>consider</b> allowing new subdivision, use and development within <b>the Coastal Environment areas of outstanding and high coastal natural character, outstanding coastal natural landscapes, and outstanding coastal natural features</b> where: The elements, patterns, processes, and qualities that contribute to the outstanding or high natural character or landscape are maintained; <del>Significant adverse effects on natural character, natural landscapes and natural features;</del> and adverse effects on areas of significant indigenous biodiversity, areas of outstanding natural character and outstanding natural landscapes and features are avoided; <b>and</b> <b>bb. outside the areas in b., significant adverse effects on natural character, natural landscapes and natural features are avoided; and</b> <b>bbb. Other adverse effects on the matters in bb. are avoided, remedied, or mitigated; and</b> The development is of a size, scale and nature that is appropriate to the environment.; <del>It is for a Poutini Ngāi Tahu cultural purpose; or It is National Grid infrastructure that has a functional and operational need to locate in these areas."</del>
Royal Forest and Bird Protection Society of New	S560.283	Coastal Environment	Coastal Environment Policies	Amend	Depending on what amendments are accepted to Policies CE - P2 and P2 a separate policy may be required to	Add new policy: <b>Manage adverse effects of activities outside of outstanding coastal natural character, outstanding coastal</b>

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Zealand Inc. (Forest & Bird) (S560)					ensure the Plan gives effect to Policy 13(b) or 15(b) of the NZCPS	<b>natural landscapes and outstanding coastal natural features by avoiding significant adverse effects and avoiding, remedying or mitigating other adverse effects of activities on natural character, natural landscapes and features in the coastal environment in accordance with Policy 13 and 15 NZCPS.</b>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.284	Coastal Environment	CE - P4	Amend	In principle Forest & Bird accepts that the Plan should include provision for lawfully established primary production activities. However, there may need to be consideration for activities that are having cumulative effects on an outstanding or high value areas.	Amend: Provide for primary production activities within the outstanding and high natural character, outstanding natural landscapes, and outstanding natural features within the coastal environment where: These are existing lawfully established activities; <del>or</del> <b>and</b> The use <del>does not degrade</del> <b>protects</b> the elements, patterns or processes that contribute to the outstanding or high values.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.285	Coastal Environment	CE - P5	Amend	The direction to "provide" needs to be moderated to a consideration in these circumstances.	Amend: <b>Consider providing</b> for buildings and structures within the coastal environment outside of areas of outstanding coastal natural character, outstanding natural landscape, and outstanding natural features where these: Are existing lawfully established structures; or Are of a size, scale and nature that is appropriate to the area; or c. Are in the parts of the coastal environment that have been historically modified by built development and primary production activities; or d. Have a functional or operational need to locate within the coastal environment."
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.286	Coastal Environment	CE - P6	Amend	While some development will be appropriate and may be preferable in these locations rather than creating sprawl, the current policy wording could	Amend: Recognise that there are existing settlements and urban areas located within the coastal environment of the West Coast/Te Tai o Poutini including parts of Westport,

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Zealand Inc. (Forest & Bird) (S560)					be read to provide for activities in a way which is inconsistent with the NZCPS.	<p>Greymouth and Hokitika <del>and</del> <b>where it may be appropriate to:</b> 1. enable new subdivision, buildings, and structures <del>within</del> and expansion of towns and settlements <del>where</del> <b>when:</b></p> <p>These <b>activities</b> are located in areas already modified by built development; <del>and or primary production activities, or the area is not subject to a natural hazard overlay</del> <del>Where located in unmodified areas, any adverse impact on natural character can be mitigated;</del> <b>and</b></p> <p>In areas of outstanding or high natural character:</p> <p>i. <b>Avoid encroachment into unmodified areas of the coastal environment;</b> and ii. <b>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 avoided, remedied, or mitigated consistent with CE-PX [new policy giving effect to Policy 13 (a) and (b) of the NZCPS];</b> and d. <b>significant natural areas are protected;</b> 2. <b>make Pprovisione</b> for lawfully established land uses and activities <b>that manage adverse effects in accordance with provisions of this Plan</b> to continue; 3ii. <del>Allow for</del> <b>consider</b> other uses with a functional need to locate in the coastal environment; 4iii. Allow for Poutini Ngāi Tahu cultural uses; and 5. <b>where the area is subject to a natural hazard overlay the activity is consistent with achieving NH objectives.</b> <del>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</del></p>

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Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.287	Coastal Environment	Coastal Environment Policies	Amend	The Plan does not control vehicle access beaches. Amendments are needed to give effect to Policy 20 of the NZCPS.	Add a new policy to restrict vehicle access onto beaches other than where appropriate areas are identified as per Policy 20 of the NZCPS.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.288	Coastal Environment	CE - P8	Oppose	The policy duplicates policy already set out in the ENG chapter specific to the National Grid. The consideration of adverse effects does not clearly relate to effects on the coastal environment which may extend beyond overlay areas. The mapping of the coastal environment area is incomplete and inconsistent. Also, the reference to "Overlay Chapter areas" appears to extend the provision beyond the CE.	Delete
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.289	Coastal Environment	Coastal Environment Rules	Amend	Permitted activities do not include conditions to manage adverse effects of maintenance activities outside of Outstanding and High overlays.	Amend and restructure the CE rules so that: <ul style="list-style-type: none"> <li>• Conditions for earthworks are included within the same rule as the activities to which they, unless the EW rules can be relied upon in which case a condition or information note to that effect should be included.</li> <li>• There in one permitted activity rule for maintenance and repair of lawfully established activities which includes the more restrictive requirement within overlays</li> </ul>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.290	Coastal Environment	CE - R1	Amend	The rule fails to include conditions or standards for maintenance and repair activities to ensure effects on indigenous biodiversity are appropriately avoided, remedied, or mitigated.	Delete "lawfully established" from the rule heading

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Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.291	Coastal Environment	CE - R2	Oppose	It is not appropriate to permit activities for enhancement as an alternative to protection without appropriate conditions.	Delete
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.292	Coastal Environment	CE - R3	Amend	It is unclear why "buildings" are included within the rule heading when buildings are provided for within the definition for "Māori Purpose Activities".	Amend the heading: <del>and buildings</del>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.293	Coastal Environment	CE - R4	Oppose in part	The types of activities captured within these rules also varies and is confusing as to why some are permitted in one overlay and not specified as permitted in the other.	Consider amending CE - R4 to capture new structures and buildings including for High and Outstanding areas from R5 and R10
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.294	Coastal Environment	CE - R5	Oppose in part	As set out with respect to the CE rules generally the rules should be restructured and simplified. It would be clearer to include all permitted activities for new buildings and structures within one rule for the CE with conditions relating to Overlays as appropriate.	Consider deleting Rule CE - R5 and combining into other rules as appropriate to separate maintenance and repair from other activities.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.295	Coastal Environment	CE - R6	Amend	As discussed above Forest & Bird submit that the CE rules be restructured to remove inconsistencies and simplify the approach between maintenance and new activities.	Consider combining CE - R9 into R6 and as a consequence delete CE - R9. Amend CE - R6 as follows: Amend the heading of CE - R6: <ul style="list-style-type: none"> <li>Delete "<b>Reconstruction</b>" from the title of the rule and ensure that activity is captured under other rules as for new activities.</li> <li>Amend condition 2. To include limits as follows: "Earthworks and land disturbance is the minimum required to undertake the activity <b>and are within 2m of the structure and involves no more than 100m3 of material excavated, deposited or remove;</b></li> </ul>

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						Retain other aspects of the rule.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.296	Coastal Environment	CE - R7	Amend	Maintenance and repair is already provided for as a permitted activity in CE - R1, including in the High Coastal Natural Character overlay	<p>Consider combining provisions for maintenance (including operation), repair and minor upgrades of National Grid to CE - R1.</p> <p>Delete condition 1. a.  <del>"a. Walking/cycling tracks, roads, farm tracks or fences; or"</del>            Amend condition 1. b.  <b>"b. Operation, maintenance, repair, upgrade to lawfully established</b> or installation of new network utility infrastructure or renewable electricity generation; or"</p> <p>Amend condition 1. c.  <b>"c. Establishment of a building platform and access to a building site in an approved subdivision or where there is no existing at the date this Plan becomes operative</b> residential building on the site;"</p> <p>Retain condition 2.</p>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.297	Coastal Environment	CE - R8	Amend	Rules R8 is the only permitted rule specifically for additions and alterations to buildings and structures. The different between upgrades and alteration or additions is not clear.	Amend CE- R8 so that it applies to the CE generally as well as for Outstanding overlays.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.298	Coastal Environment	CE - R9	Oppose	<p>Forest &amp; Bird seeks to combine this rule with R6.</p> <p>Both rules are almost identical and combining them reduces duplication.</p> <p>Forest &amp; Bird also considers the provisions in this rule should extend beyond High and Outstanding the full coastal environment for consistency and certainty for effects management of these activities.</p>	<p>Combine with R6 and as a result Delete R9</p> <p>Extend the combined rule to the full coastal environment.</p>

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Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.299	Coastal Environment	CE - R10	Amend	It is not clear how these activities could be carried out without provision for earthworks.	Amend Rule CE - R10 to be a restricted discretionary Activity
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.300	Coastal Environment	CE - R11	Oppose	Forest & Bird considers that the earthworks provided for in R11 should align with activities that can appropriately be permitted activities in the Outstanding Coastal Environment.	Delete
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.301	Coastal Environment	CE - R12	Amend	The rule needs to apply to all of the coastal environment to ensure that consent is required for activities in the Coastal Environment.	Amend the rule heading to apply to the Coastal Environment
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.302	Coastal Environment	CE - R13	Oppose	Forest & Bird considers that where these activities are outside the Māori Purpose Zone (as provided for at CE - R3) the activity should be discretionary or non-complying under CE - R21 on the same basis as where CE - R16 is not met as sought below.	Make amendments to CE - R13 so in the Outstanding Coastal Environment a Discretionary activity status applies.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.303	Coastal Environment	CE - R14	Amend	The rule fails to include discretion necessary to give effect to Policies 13 and 15 of the NZCPS which provide direction beyond High and Outstanding values.	Consider combining CE - R14 and CE - R15
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.304	Coastal Environment	CE - R15	Amend	The rule fails to include discretion necessary to give effect to Policies 13 and 15 of the NZCPS which provide direction beyond Outstanding values.	Consider combining CE - R14 and CE - R15
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.305	Coastal Environment	CE - R16	Amend	There seems to be some overlap between R16 and R18 for earthworks associated with new network utilities and renewable.	Combine CE - R16 with CE - 21 so that the activity is Discretionary on the same condition for natural features.
Royal Forest and Bird Protection	S560.306	Coastal Environment	CE - R17	Amend	Consistent with amendments sought for R12 and Rule R19 amend rule R17 to	Amend: <b>Maintenance, repair, alteration and reconstruction</b> of Natural Hazard Mitigation



Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Society of New Zealand Inc. (Forest & Bird) (S560)					provide for Maintenance, repair, alteration, and reconstruction of natural hazard mitigation structures that do not comply with R12. Amendments are sought to R19 to apply to new natural hazard mitigation structures in all parts of the Coastal environment other than Outstanding areas.	Structures and Activities in the High Coastal Natural Character Overlay not meeting Controlled Activity Standards of <b>CE - R12</b> Activity Status Restricted Discretionary Where: 1. These are not within the Outstanding Coastal Environment Area. Discretion is restricted to: <b>a. whether the natural hazard mitigation structure is lawfully established; ab.</b> Any requirements for landscape evaluation; <b>bc.</b> Effects on habitats of any threatened or protected <b>flora or fauna</b> species; <b>ed.</b> Effects on the threat status of land environments in category one or two of the Threatened Environments Classification; <b>e. Effects on ecological functioning and the life supporting capacity of air, water, soil, and ecosystems; f. Effects on the intrinsic values of ecosystems; Effects on public access; g. Effects on Poutini Ngāi Tahu values and any Sites and Areas of Significance to Māori identified in Schedule Three; h. Landscape and visual effects; ei.</b> The extent to which the site is visible from a road or public place; <b>ej.</b> Any effects on the natural character of the coast; <b>k. Location, dimensions, and appearance of the structure.</b>  Activity status where compliance not achieved: <del>Discretionary</del> <b>Non-complying</b>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.307	Coastal Environment	CE - R18	Not Stated	As discussed with respect to R11 above it is not helpful to provide for earthworks separately to the activities/purposed for which they relate. Forest & Bird considers that the earthworks provided should align with activities that can appropriately be	Amend: <b>Activities and</b> Earthworks within the Outstanding Coastal Environment Area <del>not provided for as a Permitted Activity</del>

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					considered in the Outstanding Coastal Environment.	
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.308	Coastal Environment	CE - R19	Amend	As per amendments sought to R12 and R17, amendments are sought to R19 to provide a Discretionary status to new natural hazard mitigation structures that do not comply with R12 beyond as well as within Outstanding areas.	Amend CE - R19 as follows: <b>"Where CE - R17 is not complied with or for New Natural Hazard Mitigation Structures and Natural Hazard Mitigation Activities in the Outstanding</b> <del>Coastal Environment not meeting Rule CE-R14</del> Activity Status Discretionary Where: These will not <b>adversely affect</b> <del>destroy</del> any Outstanding Natural Feature identified in Schedule Six or the values which make it Outstanding; <del>except</del> <del>Where a written report of a suitably qualified natural hazards professional identifies that the Outstanding Natural Feature is a severe risk to people or property.</del> Activity status where compliance not achieved: <del>Non-complying</del> <b>prohibited</b>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.309	Coastal Environment	Discretionary Activities	Oppose	New Plantation forestry is not appropriate in Outstanding Coastal Environment areas or Significant Natural Areas.	Add a new Discretionary rule for Plantation forestry as follows: <b>CE - R20A Afforestation with Plantation Forestry in the Coastal environment outside High Coastal Natural Character and Outstanding Coastal Environment Area overlays Activity Status Discretionary Where: the area of afforestation does not include any biodiversity meeting the significance criteria in Appendix 1 of the WCRPS. Advice Note: 1. When assessing resource consents under this rule, assessment against the relevant Coastal Environment, Ecosystems and Indigenous Biodiversity, Natural Features and Landscapes policies will be required. 2. This rule also applies to Plantation forestry activities where this</b>

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						<b>provision is more stringent than the NES - PF. Activity status where compliance not achieved: NC</b>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.310	Coastal Environment	CE - R21	Amend	Activities beyond those considered in the RD rules should not be anticipated in High and Outstanding overlays. A non-complying activity status better reflects this and implements the directive policy.	Amend to a non-complying rule
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.311	Coastal Environment	CE - R22	Oppose	The rule is contrary to the NZCPS	Amend CE- E22: "Activities in the Coastal Environment that would destroy any Outstanding Natural Feature identified in Schedule Six or the values which make it Outstanding or activities not meeting CE - R19 in the Outstanding Coastal Environment Area"  Amend to a prohibited activity status.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.312	Coastal Environment	Coastal Environment Rules	Not Stated	The scope of activities and area of application of the proposed rules within the CE does not appear to capture all activities consistently or apply to the whole of the CE. Amendments are required to give effect to the NZCPS	Add a discretionary rule for activities in the Coastal Environment that are not specifically provided for under the other CE rules.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.313	Earthworks	Overview	Amend	This chapter needs to clearly state that it does not address vegetation clearance, and that any vegetation clearance associated with earthworks must comply with the ECO chapter.	Include in the overview clarification of the relationship between EW and vegetation clearance: <b>"Vegetation will often cover the area to be affected by earthworks. Where that is the case, the earthworks must also comply with the vegetation clearance rules and other provisions in the ECO chapter. This EW chapter does not manage the effects on vegetation, so the Eco chapter</b>

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						<b>must also apply."</b>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.314	Earthworks	Earthworks	Support in part	See Key Issues for submission points.	Amend in line with decisions sought in Key Issues above, with respect to referring to other chapters in the Plan and the use of the term 'overlay chapters'.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.315	Earthworks	Earthworks	Amend	The explanation of when a consent may be needed from the Regional Council, in particular in relation to the requirements of the NESFM, should give much more direction to Plan users about the circumstances in which a different consent might be needed. For example, the reference to earthworks that may 'affect wetlands' is very vague and doesn't flag to the user that works within certain margins of wetlands will require consent, as well as where works may drain or partially drain the wetland.	Amend to include much more detail about when a consent from the regional may be needed, including a very clear statement setting out the circumstances in which earthworks near a wetland may require consent.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.316	Earthworks	EW - P1	Oppose in part	The approach set out is not clear that adverse effects that are more than minor should be managed.	Replace 'significant' with 'more than minor'.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.317	Earthworks	EW - P2	Support in part	'Minimising' effects is not an appropriate standard. Effects could still be significant, even where they are minimised.	Replace 'minimise' with 'avoid, remedy or mitigate.'
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.318	Earthworks	EW - R1	Amend	The general standards must include a requirement that any vegetation clearance that is caused by, or associated with, the earthworks, must be permitted by the ECO chapter.  This cannot be limited to 'overlays' as it	Add the following standard: <b>8. Any vegetation clearance that is caused by the earthworks, or by the associated works (e.g., smothering by the excavated materials) must meet the Permitted Activity Standards of the ECO chapter.</b>

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					is not clear that this would protect all SNAs, given the lack of an appropriate SNA schedule.	
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.319	Earthworks	EW - R2	Amend	Permitted activity status on the basis of "approval" needs to be consistent with a lawful authorization under the RMA.	Clarify the meaning of: "approved subdivision" "approved access" "approved well or bore".
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.320	Earthworks	EW - R3	Oppose	Add a limit for earthworks in the NOSZ	b. Add to Rule EW - R3 the following conditions: "4. <b>Where the earthworks are in the NOSZ they are: A maximum of 250m<sup>2</sup>/site of land is disturbed in any 12-month period; A maximum of 200m<sup>3</sup> of material is transported off site in any 12-month period; and c. There is a maximum 1m change of existing ground level.</b> "
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.321	Earthworks	EW - R3	Amend	See key Issues above for submission points on the use of the term 'Overlay Chapters' and 'Overlay' area	Replace term 'Overlay', or otherwise clarify in line with Key Issue above.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.322	Earthworks	EW - R4	Amend	See key Issues above for submission points on the use of the term 'Overlay Chapters' and 'Overlay' area	Replace term 'Overlay', or otherwise clarify in line with Key Issue above.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.323	Earthworks	EW - R5	Amend	See key Issues above for submission points on the use of the term 'Overlay Chapters' and 'Overlay' area	Replace term 'Overlay', or otherwise clarify in line with Key Issue above.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.324	Earthworks	EW - R6	Oppose	For reasons set out with respect to the BCZ and MINZ that those zones are deleted.	Delete EW - R6
Royal Forest and Bird Protection	S560.325	Earthworks	EW - R7	Amend	Make it clear in these rules that any vegetation clearance associated with	Make it clear in these two rules, by way of a condition, that: <b>any vegetation clearance</b>

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Society of New Zealand Inc. (Forest & Bird) (S560)					the earthworks must comply with the ECO chapter.	<b>that is caused by the earthworks, or by the associated works (e.g., smothering by the excavated materials) must comply with the provisions of the ECO chapter.</b>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.326	Earthworks	EW - R8	Amend	Make it clear in these rules that any vegetation clearance associated with the earthworks must comply with the ECO chapter.	Make it clear in these two rules, by way of a condition, that: <b>any vegetation clearance that is caused by the earthworks, or by the associated works (e.g., smothering by the excavated materials) must comply with the provisions of the ECO chapter.</b> Retain matters of discretion. The advice note at the bottom of R8 should be amended in line with Key Issue above.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.327	Light	Light	Amend	The provisions of the chapter do not appropriately protect indigenous biodiversity. Artificial light can have significant adverse effects on indigenous biodiversity. Of particular note is the Westland Black Petrel, which mainly lives near the coast, and which is adversely impacted by activities that involve light. In particular, industrial activities that run around the clock and involve artificial lighting are detrimental to them.	Amend provisions of the chapter to protect indigenous biodiversity more appropriately.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.328	Light	LIGHT - O2	Support		Retain
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.329	Light	LIGHT - P1	Support in part	Minor amendment required to broaden paragraph (e).	Include "and avoids adverse effects on indigenous biodiversity" at end of (e).

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Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.330	Light	LIGHT - P2	Oppose	Light associated with temporary activities should not be enabled in all circumstances.	Delete a.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.331	Light	Light Rules	Amend	The rules need to be amended to protect the fauna, in particular the Westland Black Petrel. Consent should be required for any industrial activity (e.g., mining, truck movements) outside of daylight hours in the coastal environment at least.	Amend: d. <del>Minimises</del> <b>Avoids</b> adverse effects on the significant habitats of light sensitive native fauna and the species themselves;
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.332	Noise	Noise	Amend	The provisions of the chapter fail to appropriately address the effects of noise on indigenous biodiversity, and the need to manage those effects.	Include provisions in the Overview, Objectives, Policies and Rules that recognise and provide for the need to protect indigenous biodiversity from adverse effects caused by noise.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.333	How The Plan Works	Zone	Amend	See Key Issues for submissions on these matters.	In accordance with the submission made under the 'Key Issues' section of this submission: a. include a section "Other relevant Te Tai o Poutini Plan provisions" and list all relevant chapters with an explanation. Include all Natural Environment Chapters and District Wide Chapters. b. make clear that all vegetation clearance is dealt with by the ECO (and NC) chapter, in both the zone overviews and amend any relevant provisions within each chapter to that effect, including that the ECO objectives and policies may be relevant to other activities c. all mining activities require consent (except NOSZ where they should be prohibited), and an ecological assessment in accordance with Appendix 1 of WCRPS is required for all mining activity consent applications.

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Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.334	Open Space and Recreation Zones	Overview	Not Stated	Forest & Bird is concerned with the approach set out in the Energy chapter which suggests that the Open Space and Recreational zone provisions do not apply to activities addressed in that chapter.	Amend the statement regarding DOC's obligations under the Plan in line with s4 RMA.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.335	Open Space and Recreation Zones	OSRZ - Open Space and Recreation Zones Policies	Amend	The generic acronyms and the division of provisions between generic and specific opens space zones is complex and could result in interpretation issues.	Re-label the policies to reflect the specific open space zone they apply to. E.g., OSZ-P11 to P14, SARZ-P15 to P17 and NOSZ - P18 to P20
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.336	Open Space and Recreation Zones	OSRZ - P2	Oppose in part	Not all open space will have a purpose and classification under an Act to provide guidance to activities that may be appropriate within the zoning. Even where such information is available it may not be designed or adequate for the purpose of policy direction in this Plan.	Add or amend policies to set out the characteristics where possible and/or describe how these are determined for each OSRZ zone.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.337	Open Space and Recreation Zones	OSRZ - P4	Amend	The addition of the last sentence clause is inappropriate, at least in respect of PCL.	Delete: <del>or where it has a link with the open space and recreation resource</del>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.338	Open Space and Recreation Zones	OSRZ - P6	Oppose in part	This policy ignores the need to protect natural values in the provision of commercial recreation activities.	Add a requirement that natural values are protected.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.339	Open Space and Recreation Zones	OSRZ - P7	Oppose in part	Promote' is a weak standard, particularly as this is the only general policy touching on the need to protect natural values.	Replace 'promote' with 'require'.
Royal Forest and Bird Protection Society of New	S560.340	Open Space and Recreation Zones	OSRZ - P9	Amend	The policy refers to "the open space values." It is not clear how these are to be identified, and as such this is a weak basis for ensuring that the natural	Amend: <b>Outside the NOSZ, and provided that natural values can be protected, consider providing for a</b> <del>Provide for the</del> range of purposes where compatible with



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Zealand Inc. (Forest & Bird) (S560)					values of each zone, and in particular the NOSZ, are protected.	the open space values including:
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.341	Open Space and Recreation Zones	OSRZ - P10	Support in part	Support in principle the provision for subdivision and development to provide for opens space needs generated by those activities, however it is not clear how this can be effective when considering subdivision and development within an existing OSRZ.	Amend to ensure that the purpose and character of OSRZ is not compromised by subdivision and development. Consider adding this policy or similar to the SUB chapter to apply to zones outside of OSRZ.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.342	Open Space and Recreation Zones	OSRZ - P11	Amend	These policies are not appropriate to apply to PCL.	We have sought that all PCL is rezoned as NOSZ. Provided that is done, these policies are mostly appropriate. However, the OSZ may still retain natural values. The policies must be amended to include a requirement to protect those values.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.343	Open Space and Recreation Zones	OSRZ - P12	Amend	These policies are not appropriate to apply to PCL.	We have sought that all PCL is rezoned as NOSZ. Provided that is done, these policies are mostly appropriate. However, the OSZ may still retain natural values. The policies must be amended to include a requirement to protect those values.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.344	Open Space and Recreation Zones	OSRZ - P13	Amend	These policies are not appropriate to apply to PCL.	We have sought that all PCL is rezoned as NOSZ. Provided that is done, these policies are mostly appropriate. However, the OSZ may still retain natural values. The policies must be amended to include a requirement to protect those values.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.345	Open Space and Recreation Zones	OSRZ - P14	Support in part	These policies are not appropriate to apply to PCL.	We have sought that all PCL is rezoned as NOSZ. Provided that is done, these policies are mostly appropriate. However, the OSZ may still retain natural values. The policies must be amended to include a requirement to protect those values.

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Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.346	Open Space and Recreation Zones	OSRZ - P14	Oppose	Oppose a blanket provision for mining.	Either delete or amend to make clear that all natural values must be protected in accordance with the ECO chapter (as amended by F&B submissions), and change 'provide' to 'consider providing'.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.347	Open Space and Recreation Zones	OSRZ - P18	Support		Retain
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.348	Open Space and Recreation Zones	OSRZ - P19	Oppose in part	A blanket enabling approach in particularly inappropriate in this zone.	Replace 'enable' with 'consider providing for'
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.349	Open Space and Recreation Zones	OSRZ - P20	Oppose	Buildings and structures that are ancillary to a permitted activity should not be enabled. Either they are a permitted activity or not.  'Conservation values' is too narrow.	Delete
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.350	Natural Open Space Zone	Overview	Amend		The purpose of the NOSZ- Natural Open Space Zone is to... and landscape values; <b>and includes all public conservation land.</b>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.351	Natural Open Space Zone	NOSZ - Natural Open Space Zone Rules	Support in part	As submitted elsewhere, each zone chapter should clearly refer to the relevant district wide chapters, including an explanation that the so- called 'overlay chapters'. It must be made clear that the vegetation clearance rules in the ECO chapter apply to all activities in this zone. If that is not made clear, we oppose these rules.	As submitted elsewhere, each zone chapter should clearly refer to the relevant district wide chapters, including: <ol style="list-style-type: none"> <li>1. an explanation that the so- called 'overlay chapters' include provisions that apply both inside and outside of identified overlays.</li> <li>2. As is done in the OSZ section, list specific chapters that are relevant.</li> </ol>

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						3. Amend introduction to this zone, and rules to make this clear. it must be made clear that the vegetation clearance rules in the ECO chapter apply to all activities in this zone. If that is not made clear, we oppose these rules.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.352	Natural Open Space Zone	NOSZ - R1	Oppose in part	Buildings and structures will not always be appropriate in this zone. Having this as a permitted activity could also lead to significant cumulative adverse effects.	Amend so that buildings and structures are discretionary, rather than permitted, in this zone.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.353	Natural Open Space Zone	NOSZ - R2	Amend	Buildings and structures will not always be appropriate in this zone. Having this as a permitted activity could also lead to significant cumulative adverse effects.	Amend so that buildings and structures are discretionary, rather than permitted, in this zone.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.354	Natural Open Space Zone	NOSZ - R3	Amend	Buildings and structures will not always be appropriate in this zone. Having this as a permitted activity could also lead to significant cumulative adverse effects.	Amend so that buildings and structures are discretionary, rather than permitted, in this zone.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.355	Natural Open Space Zone	NOSZ - R4	Amend	Buildings and structures will not always be appropriate in this zone. Having this as a permitted activity could also lead to significant cumulative adverse effects.	Amend so that buildings and structures are discretionary, rather than permitted, in this zone.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.356	Natural Open Space Zone	NOSZ - R5	Amend	Buildings and structures will not always be appropriate in this zone. Having this as a permitted activity could also lead to significant cumulative adverse effects.	Amend so that buildings and structures are discretionary, rather than permitted, in this zone.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.357	Natural Open Space Zone	NOSZ - R6	Amend	Buildings and structures will not always be appropriate in this zone. Having this as a permitted activity could also lead to significant cumulative adverse effects.	Amend so that buildings and structures are discretionary, rather than permitted, in this zone.
Royal Forest and Bird Protection	S560.358	Natural Open Space Zone	NOSZ - R16	Amend	Mineral Extraction Activities should be prohibited in the NOSZ. This should	Amend activity status to prohibited, and include all mining activities, including

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Society of New Zealand Inc. (Forest & Bird) (S560)					also be extended to all mining activities, including prospecting, exploration, extraction, processing, and ancillary activities.	prospecting, exploration, extraction, processing, and ancillary activities.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.359	Planning Maps and Overlays	Rezoning Requests	Amend	Forest & Bird submits that all public conservation land be NOSZ.	All public conservation land be NOSZ.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.360	Open Space Zone	Open Space Zone	Amend	As submitted elsewhere, the Plan lacks a coherent approach to directing Plan users to other relevant chapters.	As set out in the Key Issue above, retain approach of listing all relevant chapters. Include ECO chapter and make clear that its provisions apply both generally and to identified SNAs in Schedule Four. All vegetation clearance is dealt with under the ECO chapter.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.361	Open Space Zone	OSZ - R11	Oppose	Mineral Prospecting and Mineral Exploration should not be permitted or restricted discretionary in the OSZ.	Delete Permitted and Restricted Discretionary Activities.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.362	Open Space Zone	OSZ - R19	Oppose	Mineral Prospecting and Mineral Exploration should not be permitted or restricted discretionary in the OSZ.	Delete Permitted and Restricted Discretionary Activities.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.363	Open Space Zone	OSZ - R22	Oppose	Mineral Prospecting and Mineral Exploration should not be permitted or restricted discretionary in the OSZ.	Delete Permitted and Restricted Discretionary Activities.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.364	Open Space Zone	OSZ - R12	Oppose	Agricultural, Horticultural or Pastoral Activities could be incompatible with the main purpose of Open Space Zone and may have adverse effects on areas of significant biodiversity. These activities should not be permitted. They should be at least discretionary activities and	Amend to make discretionary.

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					require a full effects assessment and a significance assessment.	
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.365	Sport and Active Recreation Zone	Sport and Active Recreation Zone	Amend	Support approach of listing all relevant chapters. ECO chapter is missing.	Include ECO chapter and make clear that its provisions apply both generally and to identified SNAs in Schedule Four.  All vegetation clearance is dealt with under the ECO chapter.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.366	Commercial and Mixed Use Zones	CMUZ - O2	Amend	Ensure that "high-quality built environment character" is one that is designed to maintain, and is integrated with, natural values and provision for biodiversity.	Amend in line with submission point and make any consequential changes to the policies and zone rules to give effect to this.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.367	Commercial and Mixed Use Zones	CMUZ - O3	Amend	Ensure that a "high-quality urban environment" is one where natural values and biodiversity are maintained and provided for.	Amend in line with submission point and make any consequential changes to the policies and zone rules to give effect to this.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.368	Industrial Zones	INZ	Amend	The zone provisions need to be clear that the natural Environment and District Wide chapters all apply, and that no lesser standard of effects management is applied, in particular on biodiversity values.	Amend overviews, objectives, policies, and rules as necessary to give effect to submission point.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.369	Residential Zones	Residential Zones	Amend	The zone provisions need to be clear that the natural Environment and District Wide chapters all apply, and that no lesser standard of effects management is applied, in particular on biodiversity and natural values.	Amend overviews, objectives, policies, and rules as necessary to give effect to submission point.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.370	Rural Zones	Rural Zones	Amend	See Key Issues above for these submission points.	In accordance with the submissions made under the 'Key Issues' section of this submission: - include a section "Other relevant Te Tai o Poutini Plan provisions" and list all relevant chapters with an explanation.

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Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.371	Rural Zones	RURZ	Amend		See above submission points regarding cross referencing chapters.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.372	Rural Zones	RURZ - O5	Oppose	This blanket support is inappropriate given the requirements of the RMA.	RURZ Objectives and policies
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.373	Rural Zones	Rural Zones - Objectives and Policies	Amend	There is no objective recognising the need to maintain and protect natural values while providing for rural uses.	Include a new objective requiring the maintenance and protection of natural values in these zones.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.374	Rural Zones	RURZ	Amend	The policies are almost silent on the need to maintain and protect natural values in these zones.	Include a new policy requiring the maintenance and protection of natural values in these zones.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.375	Rural Zones	RURZ - P18	Oppose	This policy is inadequate to appropriately manage adverse effects, in particular it does not give effect to Chapter 7 WCRPS.	Delete
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.376	Rural Zones	RURZ - P20	Amend	Because there is no consistent SNA schedule, this is inadequate to protect significant biodiversity.	Amend to ensure that all natural values are protected.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.377	Rural Zones	RURZ - P21	Support in part	Amend to require an ecological assessment in accordance with Appendix 1, WCRPS. Also amend to require effects management in accordance with Chapter 7 WCRPS.	Amend to require an ecological assessment in accordance with Appendix 1, WCRPS. Also amend to require effects management in accordance with Chapter 7 WCRPS.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.378	Rural Zones	RURZ - P24	Oppose	Forest & Bird opposes the MINZ.	Delete

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Zealand Inc. (Forest & Bird) (S560)						
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.379	Rural Zones	RURZ - P25	Oppose	This policy is contrary to the WCRPS, including the direction to manage effects on biodiversity in accordance with chapter 7.	Delete, or amend to give effect to the WCRPS and RMA requirements.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.380	General Rural Zone	GRUZ	Amend	See Key Issues for submission points	<p>Include at least a discretionary consent requirement for all mining activities, including prospecting, explorations, extraction, processing, and ancillary activities.</p> <p>Include a requirement in that rule/those rules to undertake an ecological assessment in accordance with Appendix 1 of the WCRPS. Also include a note that all vegetation clearance associated with mining activities is dealt with under the ECO chapter.</p>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.381	General Rural Zone	Overview	Amend	Acknowledge the presence of indigenous vegetation and habitats of native species interspersed in the GRUZ landscape	Amend paragraph three to include: The GRUZ - General Rural Zone is characterised by an open, vegetated landscape <b>that includes original and regenerating indigenous vegetation and habitats of indigenous fauna, interspersed with pasture and</b> low-density buildings and structures..."
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.382	General Rural Zone	GRUZ	Amend	See Key Issues submission points.	<p>As set out in the Key Issue above, retain approach of listing all relevant chapters.</p> <p>Include ECO chapter and make clear that its provisions apply both generally and to identified SNAs in Schedule Four.</p> <p>All vegetation clearance in this zone is dealt with under the ECO chapter.</p>

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Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.383	General Rural Zone	GRUZ - R1	Amend	This appears to allow for farm quarries in Schedules 1-8, contrary to P20. It also does not protect SNAs not yet on schedule 4.	Amend to remove quarrying from the permitted activity.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.384	General Rural Zone	GRUZ - R11	Oppose	See Key Issues above.	Delete
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.385	General Rural Zone	GRUZ - R12	Oppose	See Key Issues above.	Delete
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.386	General Rural Zone	GRUZ - R18	Oppose	This rule only applies to Schedule Ten, previously mined areas. However, no areas have been identified. It is also not certain that previously mined areas won't now contain important biodiversity values.	Delete, and delete Schedule 10 as it is empty.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.387	General Rural Zone	GRUZ - R20	Oppose	Intensive Indoor Primary Production	Add the following conditions: <ul style="list-style-type: none"> <li>• Not in overlays or in SNAs</li> <li>• Not in coastal environment</li> <li>• No clearance of indigenous vegetation - vegetation clearance is managed by ECO rules</li> <li>• Non-compliance of overlays should become NC activity</li> </ul>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.388	General Rural Zone	GRUZ - R25	Oppose	Mineral Extraction See Key Issues above.	Delete



Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.389	General Rural Zone	GRUZ - R32	Amend	Mining Activities	As submitted above, all mining activities should require discretionary consent. This also needs to include a requirement to undertake an ecological assessment in accordance with Appendix 1 WCRPS. The rule should make it clear that any vegetation clearance associated with mining activities is regulated by the ECO chapter, and that the objectives and policies of that chapter apply.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.390	Rural Lifestyle Zone	RLZ - R16	Support	Support that Intensive indoor primary production is a non-complying activity	retain
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.391	SPZ - Special Purpose Zones	SPZ - Special Purpose Zones	Amend	See Key Issues for submissions on these matters.	Amend to include a section "Other relevant Te Tai o Poutini Plan provisions" and list all relevant chapters with an explanation. Include all Natural Environment Chapters and District Wide Chapters.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.392	Buller Coalfield Zone	Buller Coalfield Zone	Oppose	This zone is completely inappropriate, for the reasons set out in the Key Issues section above.	Delete the Buller Coalfield Zone and rezone the affected land as follows: <ul style="list-style-type: none"> <li>• GRUZ for private land in pasture</li> <li>• NOSZ for private land that has high natural values</li> <li>• NOSZ for all public conservation land</li> <li>• In other cases, zone consistently with adjacent land zone as appropriate.</li> </ul>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.393	Future Urban Zone	Overview	Oppose in part	It is inappropriate to provide for subdivision and urban development ahead of rezoning other than through a separate Plan change process.	Amend as follows: The zone is a holding zone where land can continue to be used for a range of rural activities and subdivision and urban development are discouraged until a structure

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						Plan is prepared, <del>or</del> <b>and</b> the land is rezoned.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.394	Future Urban Zone	Future Urban Zone Rules	Amend	The rules should make clear that any vegetation clearance associated with the activities is governed by the ECO and/or NC chapters.	Amend rules in line with submission point.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.395	Future Urban Zone	FUZ - R10	Oppose	This appears to allow permitted activities to occur ahead of rezoning Plan change. This is inappropriate as a rezoning Plan change could make changes to a structure Plan and may issue on the site that require specific management not achieved under the permitted zone rules. If it is intended not to apply until after rezoning Plan change is operative, then there is no need for the rule in any case.	Delete
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.396	Future Urban Zone	FUZ - R19	Support	Support that Intensive indoor primary production is a non-complying activity	Retain
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.397	Future Urban Zone	FUZ - R23	Support	Support that Intensive indoor primary production is a non-complying activity	Retain
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.398	Mineral Extraction Zone	Mineral Extraction Zone	Oppose	This zone is completely inappropriate, for the reasons set out in the Key Issues section above.	Delete the Mineral Extraction Zone and rezone the affected land as follows: <ul style="list-style-type: none"> <li>• GRUZ for private land in pasture</li> <li>• NOSZ for any private land that has high natural values</li> <li>• NOSZ for all public conservation land</li> <li>• In other cases, zone consistently with adjacent land zone as appropriate</li> </ul>

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Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.399	Māori Purpose Zone	MPZ	Amend	Forest & Bird supports this chapter, provided that it is made clearer that the provisions of the ECO chapter, as amended by this submission, apply.	Make clear in the Overview, and in the rules for this zone, that the provisions of the ECO chapter (as amended by the F&B submission) also apply. Also specify the other chapters that are relevant, including CE, EW, NC, NFL.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.400	SCHED2 - SCHEDULE OF NOTABLE TREES	SCHED2 - SCHEDULE OF NOTABLE TREES	Support		Retain
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.401	SCHED4 - SCHEDULE OF SIGNIFICANT NATURAL AREAS	SCHED4 - SCHEDULE OF SIGNIFICANT NATURAL AREAS	Amend	<p>The introduction needs amendment to make clear that a consistent region wide SNA survey has not been undertaken, and that within the Grey District, there may be further SNAs.</p> <p>Also, an amendment is needed to clarify when an ecological assessment may be required.</p> <p>Support retention of the current contents of Schedule Four.</p>	<p>Amend:  <b>A regionally consistent assessment against the criteria in Appendix 1 WCRPS to identify all areas of significant indigenous biodiversity has not yet been completed.</b></p> <p>Only <b>previously identified</b> areas within Grey District have been included in Schedule Four <del>scheduled as Significant Natural Areas</del> in Te Tai o Poutini Plan.</p> <p>Within the Buller and Westland District, <b>and in the Grey District outside of Schedule Four areas</b>, an assessment of significance will be undertaken at the time any resource consents are applied for in relation to the Ecosystems and <b>Indigenous Biodiversity Rules. An ecological significance assessment will also be required for any mining activities.</b></p>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.402	SCHEDULES	SCHED5 - SCHEDULE OF OUTSTANDING NATURAL LANDSCAPES	Support		Retain

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Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.403	SCHED6 - SCHEDULE OF OUTSTANDING NATURAL FEATURES	SCHED6 - SCHEDULE OF OUTSTANDING NATURAL FEATURES	Support		Retain
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.404	SCHED7 - SCHEDULE OF HIGH COASTAL NATURAL CHARACTER	SCHED7 - SCHEDULE OF HIGH COASTAL NATURAL CHARACTER	Support		Retain
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.405	SCHED8 - SCHEDULE OF OUTSTANDING COASTAL NATURAL CHARACTER	SCHED8 - SCHEDULE OF OUTSTANDING COASTAL NATURAL CHARACTER	Support		Retain
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.406	Schedule Nine: Lawfully Established Mineral Extraction and Processing Areas	SCHED9 - LAWFULLY ESTABLISHED MINERAL EXTRACTION AND PROCESSING AREAS	Oppose	<p>As submitted above, we seek the deletion of the MINZ and BCZ.</p> <p>If this schedule is to be retained, include more detailed information. Include consent expiry dates.</p> <p>The introduction should make clear that there is no further implied or express permission, status or priority, or policy intent to provide for the listed activities/areas beyond their already consented status.</p>	Amend in line with submission or delete.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.407	Schedule Ten: Previously Mined Locations in the Rural and Open Space and Recreation Zones	Schedule Ten: Previously Mined Locations in the Rural and Open Space and Recreation Zones	Oppose	<p>This schedule is empty. It is not clear what purpose it serves.</p> <p>Previously mined areas may contain important natural values. It is not appropriate to provide for activities in this area as of right.</p>	Either delete or clarify the purpose of this schedule.
Royal Forest and Bird Protection Society of New	S560.408	Appendix Seven: Mineral Extraction	Appendix Seven: Mineral Extraction	Oppose	<p>Mineral Extraction Management Plans only feature in the BCZ chapter, in one rule. As we have sought the deletion of</p>	Delete.

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Zealand Inc. (Forest & Bird) (S560)		Management Plan Requirements	Management Plan Requirements		the BCZ, we also seek the deletion of this appendix. A management Plan is not an appropriate replacement for rules.	
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.409	How The Plan Works	Step 3 - Locate the relevant district-wide rules	Support	Forest & Bird seeks further amendments to the schedule to improve and clarify information including consent expiry. It is not clear why Schedule Four SNAs are not included in the list of Overlays. This issue is very unclear in the Plan because the Ecosystems chapter is listed as an overlay in the definition of 'Overlay Chapters', but its provisions apply both to the Schedule Four areas (arguably what would be called the overlay) and also more widely.	Include Significant Natural Areas, but with acknowledgement that the rules apply to a wider area than Schedule 4 SNAs: <b>"Significant Natural Areas: areas of significant indigenous vegetation and significant habitats of indigenous fauna. Only some of these areas have been identified on Schedule Four. The consenting process will; be used to identify further SNAs. The rules in the Ecosystems and Indigenous Biodiversity chapter apply both to the Schedule Four areas and everywhere district wide."</b>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.410	Interpretation	AGRICULTURAL, PASTORAL AND HORTICULTURAL ACTIVITIES	Amend		Delete farm quarries from this definition, given the lack of SNA identification. Alternatively, retain in definition but amend all relevant provisions in GRUZ and elsewhere to ensure SNAs adequately protected.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.411	Interpretation	AREA OF SIGNIFICANT INDIGENOUS BIODIVERSITY	Amend	This definition creates confusion with the definition of "Significant Natural Area" and is inconsistent with the definition of "Significant Natural Area or SNA" in the WCRPS.	Include the WCRPS definition for "Significant Natural Area, or SNA" in the Interpretation section.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.412	Interpretation	AREA OF SIGNIFICANT INDIGENOUS BIODIVERSITY	Amend	However, it is not clear why a separate definition to "Significant Natural Area" is necessary for subdivision purposes.	Add an explanation to the definition or within the ECO chapter overview to the effect that in this Plan, Significant Natural Area is used as a term to mean both mapped and unmapped areas meeting the criteria. For specific reference to mapped areas (i.e., in the Grey District) the wording used in the Plan and Planning maps is 'SNA identified in Schedule Four'.

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Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.413	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity	Amend	There is also confusion with terminology in the Plan where neither definition is used, and provisions refer to "areas of significant indigenous vegetation or significant habitats of indigenous fauna" or "significant indigenous biodiversity" or "Significant indigenous biodiversity including Significant Natural Areas".	Add an explanation to the definition or within the ECO chapter overview to the effect that in this Plan, Significant Natural Area is used as a term to mean both mapped and unmapped areas meeting the criteria. For specific reference to mapped areas (i.e., in the Grey District) the wording used in the Plan and Planning maps is 'SNA identified in Schedule Four'.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.414	Coastal Environment	Coastal Environment	Amend	The definition also includes words similar to "Significant indigenous biological diversity" which is defined in the WCRPS with respect to the coastal environment and Policy 11 of the NZCPS.	Consider including the WCRPS definition for "Significant indigenous biological diversity" for use in the CE Chapter with respect to the coastal environment and Policy 11 of the NZCPS.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.415	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity	Amend		Include policy direction in the ECO chapter, and any chapters that regulate mining activities, for Significant Natural Areas to be identified and mapped through an ecological assessment process
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.416	Subdivision	SUB - S2	Support		Delete "having regard to ground conditions, gradient, access, natural hazards, indigenous vegetation and habitat, amenity and health and safety" from the definition and make sure these matters are included in rules which make provision for building platforms. In SUB-S2 include that these matters must inform the indicative building Platform location, such that effects, including for access are avoided or minimized to the greatest extent possible with respect to these matters.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.417	Coastal Environment	Coastal Environment	Amend	In Forest & Bird's view the CE has not been adequately mapped	Amend coastal environment mapping meets the requirements of NZCPS Policy 1.

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Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.418	Coastal Environment	Coastal Environment Policies	Support	Subsequent amendment	Amend to include policy direction that areas mapped as CE outside of Outstanding Coastal Natural Character/Natural Landscape and High Coastal Natural Character overlays, that can be determined as beyond the coastal environment through a consent process will not be subject to CE chapter provisions.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.419	Subdivision	SUB - S2	Amend		Amend SUB-S2 1. ... <b>having regard to ground conditions, gradient, access, natural hazards, indigenous vegetation and habitat, amenity and health and safety. Such that effects, including for access are avoided or minimized to the greatest extent possible with respect to these matters.</b>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.420	Planning Maps and Overlays	Coastal Environment	Amend	The mapped area is insufficient, and inconsistency applies Policy 1 of the NZCPS.	Redo and update the mapping of the Coastal Environment using appropriate experts to identify the extent by applying Policy 1 of the NZCPS landward of the CMA and identifying any further areas of High natural character or Outstanding coastal environment.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.421	Interpretation	ENERGY ACTIVITY	Amend	Alternative relief	Alternatively amend the definition "means <del>the use of land, buildings, and structures for the purpose of energy investigation,</del> <b>electricity</b> generation, transmission and distribution. This includes <del>all types of</del> renewable electricity generation, <b>where electricity generation meets the definition of RSI under the WCRPS.</b>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.422	Interpretation	LAWFULLY ESTABLISHED	Amend	Subsequent amendment	Amend: <b>Lawfully established in relation to buildings and structures, means buildings, and structures that: Were lawfully established at the date of notification of the Plan; or Where resource consent has been granted at the date of notification of the Plan; or Where building consent has been granted for an activity lawfully</b>

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						<b>approved under a previous District Plan. In relation to activities</b> means activities: permitted through a rule in a Plan, a resource consent; <b>or</b> a national environmental standard or by an existing use right (as provided for in Section 10 of the RMA); <b>or</b> in the case of mineral extraction <del>it also includes</del> an activity permitted through a Coal Mining Licence issued under the Coal Mines Act (1979); <b>and does not include where the resource consent or licence has expired and not been renewed."</b>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.423	Interpretation	EXISTING BUILDINGS AND STRUCTURES	Oppose	The definition clearly includes buildings and structures that are not existing	Delete this definition
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.424	Interpretation	LAKE	Oppose	Under the WCRPS the district council has biodiversity responsibilities for the margins of lakes and rivers. Natural character s6(a) includes margins.	Delete
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.425	Interpretation	MĀORI PURPOSE ACTIVITIES	Amend		Clarify difference between this and 'Poutini Ngai Tahu activities' - both in the definitions and the various Plan provisions and amalgamate if appropriate.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.426	Interpretation	MINERAL EXTRACTION	Amend	'distribution' and vehicle movements may need to be managed separately, as there will be dust and noise effects.	Delete Ancillary activities
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.427	Interpretation	MINERAL EXTRACTION	Amend	The definition should exclude the removal of overburden and activities that occur before extraction of the mineral, as the effects of these may need to be considered separately.	Forest & Bird has sought amendments to all mining activity rules, including prospecting, exploration, extraction, processing, and ancillary activities. Provided those changes are made, the broad definition is probably



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						acceptable.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.428	Interpretation	OVERLAY CHAPTER	Amend	The 'overlay chapters' contain provisions that apply more broadly than only to scheduled overlays.	Amend to explain the difference between overlay chapter and overlay provisions, as the 'overlay chapters' contain provisions that apply more broadly than only to scheduled overlays.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.429	Interpretation	RENEWABLE ELECTRICITY GENERATION ACTIVITIES	Amend	limit the definition to only renewable electricity generation that is also Regionally Significant Infrastructure, where generation is of more than 1 MW of electricity and its supporting infrastructure where the electricity generated is supplied to the electricity distribution and transmission networks.	Amend to limit the definition to renewable electricity generation within the scope of the definition for Regionally Significant Infrastructure
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.430	Interpretation	SIGNIFICANT NATURAL AREA	Amend	Under the WCRPS definition Significant Natural Area includes areas not included as an SNA in a regional or district Plan that nevertheless meet one or more of the criteria.	Add an explanation to the definition and also within the ECO chapter overview to the effect that in this Plan, Significant Natural Area is used as a generic term to mean mapped and unmapped areas meeting the criteria.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.431	Interpretation	OFFICIAL SIGN	Amend	There are only a few uses of this term "Significant Natural Area" in the Plan provisions which are not limited to Schedule Four, and it is unclear in those instances whether limiting it to Schedule Four is intended or not.	Amend Where reference is specific to unmapped areas this should be stated on each occasion and for specific reference to mapped areas (i.e., in the Grey District) include specific reference to Schedule Four, i.e. "SNA identified in Schedule Four".
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.432	Whole Plan	Whole plan	Amend		Ensure that defined terms are consistently hyperlinked or otherwise identified as a defined term.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.433	STRATEGIC DIRECTION	Strategic Directions Overview	Amend	The intent at 4. does not accurately reflect the sustainable management purpose of the Act, of with protection is generally to the natural environment	Amend 4. Fostering the use, <del>and</del> development, <b>and protection</b> of natural and physical resources whilst <b>providing for protection</b> <del>protecting of</del> the natural values that have been elevated to matters of national importance by the Resource

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					along with use and development. It also ignores Councils' functions under s31.	Management Act 1991 and those matters of national and regional significance by National and Regional Policy Statements, <b>as well as natural values that are required to be maintained and protected as part of Councils' functions under the RMA;</b>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.434	STRATEGIC DIRECTION	Strategic Directions Overview	Amend	That statement on how to read the strategic objectives is not only inconsistent with the explanation at the start of the Strategic Directions Overview it is inappropriate for objectives	Include the following statement in the Strategic Directions Overview: <b>For the purpose of District Plan development, including Plan changes, the strategic objectives in this chapter provide direction for the development of the more detailed provisions contained in the District Plan.For the purpose of District Plan implementation (including the determination of resource consent applications and notices of requirement):a) the strategic objectives may provide guidance on what the related objectives and policies in other chapters of the District Plan are seeking to achieve; andb) the relevant objectives and policies of the District Plan (including strategic objectives in this chapter) are to be considered together and no fixed hierarchy exists between them.</b>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.435	STRATEGIC DIRECTION	Strategic Directions Overview	Amend	Saying that in interpreting and implementing the District Plan that all other objectives and policies are to be read and achieved in a manner consistent with the strategic directions may not allow the Plan to give effect to higher order documents such as the NZCPS or the WCRPS or the NPS-FW.	Delete the following statement wherever it occurs in the Plan: <del>For the purposes of preparing, changing, interpreting, and implementing Te Tai o Poutini Plan, all other objectives and policies in all other chapters of this Plan are to be read and achieved in a manner consistent with these Strategic Directions.</del>
Royal Forest and Bird Protection	S560.436	Interpretation	Definitions	Amend	"important natural environment areas and features" as used in strategic	Consider including a definition for important natural environment areas and features

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Society of New Zealand Inc. (Forest & Bird) (S560)					objectives, being those matters under s6(a), (b) and (c) of the RMA and Policies 11, 13 and 15 of the NZCPS.	
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.437	Energy	Other relevant Te Tai o Poutini Plan provisions	Amend	The consideration of relevant provisions within overlay chapters is limited by those provisions only applying "within an overlay area identified in the Planning maps"	Under the "Other relevant Te Tai o Poutini Plan provisions" heading, amend in line with the Key Issue addressed above, making it clear that not only the provisions that apply specifically to identified overlays apply.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.438	Energy	Other relevant Te Tai o Poutini Plan provisions	Amend	The consideration of relevant provisions within overlay chapters is limited by those provisions only applying "within an overlay area identified in the Planning maps"	Ensure the Coastal Environment chapter is referenced in the other relevant provisions section.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.439	Energy	Energy	Amend		As sought elsewhere, amend the definition of overlay chapter to deal with the Key Issue as set out above, so that it is clear that not only the 'overlay provisions' apply.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.440	Energy	Energy Policies	Amend		Make consequential amendments to all referencing of overlay chapters and other relevant provisions to ensure that all ECO chapter provisions apply.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.441	Energy	Energy	Support		Delete reference to Strategic Objectives, as submitted elsewhere.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.442	Energy	Energy	Amend		Make amendments to ensure that the natural open space zone provisions also apply to activities covered in this chapter.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.443	Energy	ENG - P6	Amend	Direction must be given as to how adverse effects must be managed.	Amend: <b>where the adverse effects are avoided, remedied, or mitigated in accordance with the Natural Environment and District Wide chapters of this Plan.</b>

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Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.444	Energy	Energy	Amend	See Key Issue above for submission points.	a specific requirement should be included to give effect to the ECO chapter provisions.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.445	Energy	ENG - O2	Amend	Significant adverse effects could still be caused even where they have first been minimised.	amend so that the objective (and any energy activities covered in this chapter) is limited to electricity distribution and supply and renewable electricity generation,
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.446	Energy	ENG - O2	Amend	Significant adverse effects could still be caused even where they have first been minimised.	<del>minimise</del> is changed to <b>avoid, remedy or mitigate in accordance with the Natural Environment and District Wide chapters of this Plan.</b>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.447	Energy	ENG - O3	Amend	The objective is also a blanket enabling provision and says nothing about the need to address adverse effects.	Amend: To provide for the development, operation, maintenance and upgrade of <b>electricity generation, distribution and supply and renewable energy generation energy activities where adverse effects can be appropriately avoided, remedied or mitigated in accordance with the Natural Environment and District Wide chapters of this Plan</b> and to protect them from the adverse effects of incompatible subdivision and development.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.448	Energy	ENG - P2	Amend		Delete particular
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.449	Energy	ENG - P2	Amend	It is also unclear how 'develop and operate' should be determined with respect to existing energy activities.	Add <b>maintain and upgrade</b> with respect to existing.

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Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.450	Energy	ENG - P2	Amend		Add: <b>i. opportunities to reduce environmental impacts</b>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.451	Energy	ENG - P2	Amend		Add <b>development</b> to ENG - P8 a. if it is relevant to existing National Grid infrastructure
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.452	Energy	ENG - P7	Amend	Alternative relief	retain the policy and include ' <b>avoid, remedy and mitigate in accordance with the Natural Environment and District Wide chapters of this Plan</b> ' in both this policy and other ENG policies.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.453	Energy	ENG - P5	Amend	The policies lack integration with overlays provisions and chapter provisions which provide for s6 RMA matters.	When considering proposals to develop, operate, maintain, and upgrade new and existing energy activities: a. <del>Recognise their functional constraints and operational requirements</del> <b>recognise that natural character, outstanding and significant natural values are to be protected and that adverse effects on the environment are to be avoided, remedies or mitigated in accordance with the Natural Environment and District Wide chapters of this Plan.</b> ; and ...
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.454	Energy	ENG - P5	Amend		Amend policies to remove conflicts and improve integration with overlay provisions and provide for s6 matters.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.455	Energy	ENG - P5	Amend		Amend the chapter overview to ensure that overlay chapters (including the provisions that apply more generally) and district wide chapters are also to be considered for energy activities.

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Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.456	Energy	ENG - P8	Amend	This is because P8 focuses on scheduled areas which do not adequately capture significant natural areas	Amend to make clear that it is not only scheduled areas - for example, the majority of SNAs are not on schedules
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.457	Energy	ENG - P8	Amend	C. needs to be amended to give effect to the policy 11 requirements to avoid/avoid significant effects.	Amend c i. to refer to all areas with important values, including those identified in schedules and areas meeting significance criteria but not yet identified. ii. delete <b>seek to</b> iii. include a new subpara that requires avoidance of adverse effects on policy 11(a) NZCPS biodiversity
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.458	Energy	ENG - P8	Amend		Amend d: Recognise that there may be some <b>attributes, character and biodiversity values</b> <del>areas within the sites and areas identified in Schedules</del> where avoidance of adverse effects is required to protect the <del>identified attributes, values and</del> characteristics <b>or values.</b>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.459	Energy	ENG - P8	Amend	the terms "major upgrades", "substantial upgrades" and "minor upgrade" are both used in the NPS-ET in different context, those terms are not defined in the NPS-ET.	Define or otherwise include some guidance on the interpretation on the terms "major upgrades", "substantial upgrades" "minor upgrade" and "upgrade"
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.460	Energy	ENG - P8	Support	the policy direction for "seek to avoid" be considered "following a route, site and method selection process and having regard to the technical and operational constraints of the network"	Amend to capture requirements for route, site, and method selection process to consider alternatives to locating infrastructure in important natural areas.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.461	Energy	ENG - R4	Amend	Standard 2 includes buildings and minor utilities structures which appear to be beyond the scope of the rule as set out in the heading for support structures and foundations.	Define minor upgrading, upgrading and substantial updating.

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Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.462	Energy	ENG - R4	Amend	Standard 2 includes buildings and minor utilities structures which appear to be beyond the scope of the rule as set out in the heading for support structures and foundations.	Delete building and minor utility structure from the rule.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.463	Infrastructure	Overview	Amend	Further the wording "specified infrastructure" reflects terminology used in the NPSFM which has a specific meaning relating to regionally significant infrastructure.	Add: <b>Infrastructure includes a range of structures, services and activities as defined - Definitions - Ngā Tautuhinga. This chapter sets out provisions with respect to the management of distribution pipelines, telecommunications networks, radio communications networks, water supply and distribution, drainage and wastewater including sewage systems and networks and for network utilities other than where this relates to: Energy Activities, addressed in the ENG Chapter; Transport activities addressed in the TRN Chapter; or Airport activities, addressed in the Airport Zone chapter. Infrastructure relating to Port Activities is addressed in the Port Zone chapter. Any infrastructure not specifically addressed in those other chapters, is captured by the provisions of this chapter.</b>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.464	Infrastructure	Overview	Amend		Amend reference to Overlay chapters in line with Key Issue above.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.465	Whole Plan	Whole plan	Amend	Consequential amendment	Make consequential amendments to change utility to <b>network</b> utility throughout the Plan
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.466	Transport	Overview	Amend	The scope and relationship of the chapter to other chapters is somewhat unclear.	Delete: <del>The Transport Chapter contains all the objectives, policies, and rules for managing the land transport corridors and the works and</del>

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Zealand Inc. (Forest & Bird) (S560)						<del>activities that occur within them.</del>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.467	Transport	Overview	Amend	effects on indigenous biodiversity need to be considered for transport activities.	Ensure that the ECO, NFL, NC, and CE chapters are recognized as also applying to all activities addressed in provisions of the Transport chapter, and that the provisions of this chapter make clear that effects on biodiversity, natural character, landscapes and the coastal environment are to be managed in accordance with those chapters.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.468	Transport	Overview	Support		Clarify the relationship between Transport provisions in this chapter and zone chapter provisions.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.469	Transport	Overview	Amend	The scope and relationship of the chapter to other chapters is somewhat unclear.	Clarify the scope of the chapter with respect to infrastructure and network utilities.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.470	Notable Trees	TREE - P2	Amend	Habitat needs to be included. Notable trees are sometimes those that provide habitat to birds or bats.	Add habitat
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.471	Notable Trees	TREE - P4	Amend		Add e. outside of bird breeding and nesting periods
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.472	Notable Trees	TREE - P4	Amend	Consequential change adding this to requirement into TREE - R2 and R3	Make consequential change adding this to requirement into TREE - R2 and R3
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.473	Sites and Areas of Significance to Māori	SASM -R7	Amend	We are not clear whether these the extraction of aotea and pounamu can be appropriately considered "farm	Consider adding a further condition/standard requiring compliance with conditions and standards of other permitted rules (and list the



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Zealand Inc. (Forest & Bird) (S560)					quarries" or "mineral extraction activities".	relevant rules) for "farm quarries and mineral extraction activities".
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.474	Sites and Areas of Significance to Māori	SASM -R7	Amend	We have also expressed our concerns with the ability of management Plans to adequately manage adverse effects on natural values, in particular on biodiversity.	Clarify how effects will be managed by Councils. Alternatively consider requiring consent for this activity.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.475	Ecosystems and Indigenous Biodiversity	Overview	Support	The WCRPS also has a different term for Policy 11 NZCPS biodiversity which should also be used for consistency in this Plan.	Amend: <b>Indigenous vegetation clearance in the Coastal Environment or adjacent to waterbodies Te Tai o Poutini Plan must also give effect to Policy 11 of the NZCPS 2010 and the WCRPS which include specific provisions for protection of indigenous biological diversity in the coastal environment. For consistency with the WCRPS biodiversity described in Policy 11 of the NZCPS is referred to as "Significant indigenous biological diversity". This chapter includes provisions for protection of this biological diversity within the coastal environment above mean highwater springs as shown on the Planning maps.</b> Where indigenous vegetation clearance is proposed within riparian margins next to rivers, lakes and wetlands refer to the Natural Character and Margins of Waterbodies chapter of the Plan for the Rules around this clearance.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.476	Ecosystems and Indigenous Biodiversity	ECO - P2	Amend	Alternative relief	Amend: <del>Allow</del> <b>make provision for</b> activities within <b>Significant Natural Areas</b> of <del>significant indigenous vegetation or significant habitats of indigenous fauna where:</del> <b>the maintenance, repair, or operation of</b> a lawfully established <b>Structure</b> activity; or It is for a Poutini Ngāi Tahu cultural purpose; or

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						This is undertaken on Poutini Ngāi Tahu or Te Rūnanga o Ngāi Tahu land in accordance with an Iwi/Papatipu Rūnanga Management Plan; <del>or</del> <b>and adverse effects can be managed to protect the Significant Natural Area in accordance with Chapter 7 Policies 2 to 6 of the WCRPS</b> The activity has a functional need to be located in the area; <del>e. The activity has no more than minor adverse effects on the significant indigenous vegetation or fauna habitat.</del>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.477	Ecosystems and Indigenous Biodiversity	ECO - P2	Amend	We have added d. to address the overarching biodiversity protection concern for all the activities that this policy covers. We are open to another method of ensuring SNAs are protected.	Include from clause d. the consideration for activities that have "a functional need to be located in the area" within P7.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.478	Ecosystems and Indigenous Biodiversity	ECO - P7	Amend	Changes are required to address uncertainty with what is intended by "activity management" to clarify that the policy applies with respect to adjacent Significant Natural Areas, and also terminology for Significant Natural Areas.	Amend: a. ... b. Whether formal protection and <del>active management of</del> <b>measures to restore or improve</b> all or part of any area of <del>a Significant Natural Area(s)-indigenous vegetation or habitat</del> will occur as part of the subdivision, use or development; c. ... d. The cumulative effects of activities within or adjacent to <b>any Significant Natural Area</b> of significant indigenous vegetation or habitat; e... <b>x. The adequacy of an assessment applying the significance criteria set out in Appendix 1 of the West Coast Regional Policy Statement;</b> g. The impact of the activity on the values of any area of significant indigenous vegetation or habitat, or threatened species and how any potential impact could be avoided, remedied, or mitigated; and ...

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Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.479	Ecosystems and Indigenous Biodiversity	ECO - P8	Amend	Also, 'minimising' is not an appropriate standard for effects management.	b. should refer to <b>avoid, remedy, or mitigate'</b> rather than ' <del>minimise</del> '.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.480	Ecosystems and Indigenous Biodiversity	ECO - P10	Amend	ECO-P10 uses the term "significant indigenous biodiversity" however this term is not defined in the Plan.	Amend: Protect indigenous biodiversity in the coastal environment <del>from inappropriate subdivision, use and development</del> by: a. Avoiding adverse effects on significant indigenous <b>biological</b> diversity <b>in accordance with Policy 11 NZCPS</b> ; and <b>b. In addition to P2, P3, P6, P7, P8</b> <del>A</del> avoiding, remedying or mitigating other adverse effects on indigenous vegetation, habitats, and species within the coastal environment.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.481	Ecosystems and Indigenous Biodiversity	ECO - P10	Amend	Alternative relief if not all Policy 11 NZCPS matters are captured by "significant indigenous biological diversity", amend Policy ECO-P10 as follows	Amend: Protect indigenous biodiversity in the coastal environment <b>in accordance with policy 11 NZCPS</b> <del>from inappropriate subdivision, use and development</del> by: a. Avoiding adverse effects on significant indigenous <b>biological</b> diversity; and <b>b. Avoiding significant adverse effects and</b> <del>A</del> avoiding, remedying or mitigating other adverse effects on indigenous vegetation, habitats, and species within the coastal environment.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.482	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity Policies	Amend	Add a new policy to provide direction for activities affecting indigenous biodiversity beyond that which meets the significance criteria in Appendix 1 of the WCRPS.	<b>Add: Where an assessment carried out by an appropriately qualified expert determines that an area containing indigenous biodiversity does not meet any of the significance criteria in Appendix 1 of the WCRPS, consider providing for subdivision, use or development in those areas for: activities with no more than minor adverse effects; when activities can avoid, remedy, or mitigate more than minor adverse effects; and</b> Where there are

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						<b>significant residual adverse effects, considering any proposal for indigenous biological diversity offsetting or compensation.</b>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.483	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity Rules	Amend	Consequential amendment	Rules may also need to be included in other chapters to ensure that significant habitats outside of indigenous vegetation are protected.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.484	Ecosystems and Indigenous Biodiversity	ECO - R1	Amend	Alternative relief	Amend: Indigenous vegetation clearance and disturbance outside of the coastal environment Activity Status Permitted Where: <del>1. It is outside of a scheduled Significant Natural Area as identified in Schedule Four;</del> <b>12. Within the Riparian Margin of a River, Lake or Wetland the</b> clearance is permitted by the Natural Character and the Margins of Waterbodies Rule NC - R1; <del>or</del> <b>and</b> <b>23. The clearance is only</b> necessary for one of the following purposes: <del>i. It is the removal of windthrown timber through:</del> a. Use of helicopter recovery methods; <del>or</del> b. Where ground based recovery is only undertaken from areas adjacent to existing vehicle tracks; <del>or</del> <b>iii.</b> i. The maintenance, operation and repair of lawfully established: <b>a. tracks, and clearance is limited to within 1m of the track</b> <b>b. fences, and clearance is limited to within 1m of the fence</b> <b>c. structures, and clearance is limited to within 3m of the structure</b> <b>d. buildings, and clearance is limited to within 5m of the building</b> <b>e. critical infrastructure, and clearance is limited to within 3m of the infrastructure</b> <b>f. network utilities, and clearance is limited to within 3m of the network utility or for above ground utilities is a maximum of area of 50m<sup>2</sup></b> <b>g. renewable electricity generation activities or natural hazard</b>

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						<p>mitigation activities, <b>and clearance is limited to a maximum area of 50m<sup>2</sup></b>;iii. For the installation of temporary network activities following a regional or local state of emergency declaration;iv. To prevent a serious threat to people, property, structures or services <b>necessary to remove vegetation that endangers human life or within 5m of existing buildings or structures</b>;v. To ensure the safe and efficient operation (including maintenance and repair) of any formed public road, rail corridor or access;viii. For the construction of new fences and traplines associated with Conservation Activities or to exclude stock or pest animals <b>from an area of indigenous vegetation, and the clearance is limited to 2m wide to provide for the new fence</b>;vii. To upgrade or create new public walking or cycling tracks up to 3m in width undertaken by the Council or its approved contractor;iviii. To comply with section 43 of the Fire and Emergency Act 2017;ix. <b>For construction or operation of an above ground or below ground network utility or the national grid where:</b>a. The construction corridor does not exceed 3m in width; andb. All machinery used in construction is cleaned and made free of weed material and seeds prior to entering the site; andc. Rehabilitation of disturbed areas is undertaken following the completion of construction;vx. <b>It is cultural harvest undertaken by Poutini Ngāi Tahu; or</b>xvi. [Either delete this condition, or include an area limit to the permitted vegetation clearance:] It is on MPZ - Māori Purpose Zoned land and undertaken in accordance with an Iwi/Papatipu Rūnanga Management Plan; orxii. <del>It is within an area subject to a QEII National Trust</del></p>

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						<p>Covenant or Ngā Whenua Rahui Kawaneta, a Reserves or Conservation Act covenant or a Heritage covenant under the Heritage New Zealand/Pouhere Taonga Act and the vegetation disturbance is authorised by that legal instrument;4. Within the Grey District it is clearance outside of an Outstanding Natural Landscape identified in Schedule Five; or5. Within the Buller and Westland Districts:i. It is the removal or clearance of mānuka, kānuka and bracken only that is not part of any wetland and which is under 15 years old, not exceeding 5ha per site over any continuous three year period, subject to provision of notice to the relevant District Council at least 20 working days prior to the proposed clearance including:a. Details of the location of the proposed clearance;b. Area of the proposed clearance; andc. Verification by documentary, photographic or other means that the vegetation is less than 15 years old and not part of any wetland; orii. It is a maximum area of 5000m per site, in total, over any continuous three year period.<b>Advice Notes:</b>1. Where clearance of mānuka, kānuka or bracken is proposed under Standard 5 (i) of this rule, if proof that the vegetation is less than 15 years old or that the site is not a wetland, is unavailable, then a resource consent will be required.2. Where indigenous vegetation clearance is proposed within the riparian margins of a waterbody refer to these sections of the Plan for the Rules around this clearance.13. Where indigenous vegetation clearance is proposed in or on a site or area of significance to Māori then Rule SASM - R4 will also apply.</p>

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Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.485	Ecosystems and Indigenous Biodiversity	ECO - R1	Amend	The proposed ECO-R1 activity status where compliance is not achieved is complex and confusing.	Amend ECO - R1 Activity status where compliance is not achieved as follows: <del>Discretionary where standard 1 or 4 is not achieved.Refer Natural Character and Margins of Waterbodies Chapter where standard 1 is not achieved</del> Where Condition 1 is not achieved Rule NC - R3 Discretionary applies. <del>Within the Grey District refer standard 4 where standard 3 is not achieved.Within the Buller and Westland Districts Controlled or Restricted Discretionary (depending on activity type) where standard 5 is not achieved.</del> <b>Where Condition 2 is not achieved Rules ECO -R5 Restricted Discretionary or ECO - R7 or ECO - R7A Discretionary apply"</b>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.486	Natural Character and Margins of Waterbodies	NC - R2	Amend	Condition 2. Support the link with NC-R2 however clearance at the permitted level should also be limited to the purposes set out in ECO-R1 as amended in this submission.	Consider making consequential changes to NC-R2 to rely on ECO-R1, including for example NC-R2 standards/conditions 2 and 5 becoming conditions in ECO-R1 or as separate standards to be met by both ECO-R1 and NC-R2.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.487	Ecosystems and Indigenous Biodiversity	ECO - R1	Amend	Alternative relief to deleting ECO - R1 condition 4 above	Amend the condition to apply to ONLs in all districts.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.488	Ecosystems and Indigenous Biodiversity	ECO - R1	Amend	In terms of condition 3.xi, we are more concerned, because the lack of a comprehensive SNA assessment means that there may be significant biodiversity values within the MPZ.	Consequential amendment to include a consent requirement for vegetation clearance in MPZ that does not meet condition 3.xi.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.489	Ecosystems and Indigenous Biodiversity	ECO - R1	Amend	Consequential amendment from ECO - R2	Amend ECO - R1 the following conditions/standards to apply in the CE and to be additional to meeting other ECO - R1 conditions; <b>and3. Within the Coastal Environment:i. the indigenous vegetation</b>

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						clearance does not disturb, damage, or destroy habitat or nesting areas of protected species.ii. The indigenous vegetation clearance does not occur in any areas identified as a SNA in Schedule Four.iii. The indigenous vegetation clearance does not occur in an area of land environment of category one or two of the Threatened Environment Classification.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.490	Ecosystems and Indigenous Biodiversity	ECO - R1	Amend	Consequential amendment	Add to ECO-R1 advice notes setting out where information on protected species can be found and where the Threatened Environment Classification can be found, as follows: <b>2. Information on protected species can be found [add location reference]</b> <b>3. The Threatened Environment Classification can be found [add location reference].</b>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.491	Ecosystems and Indigenous Biodiversity	ECO - R1	Amend	Consequential amendment	Add to ECO - R1 the following Activity status where compliance is not achieved: <b>Where Condition 3 is not achieved Rules ECO - R7 and ECO-R7A Discretionary apply"</b>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.492	Planning Maps and Overlays	Ecosystems and Indigenous Biodiversity	Amend	The Threatened Environment Classification areas of categories one and two may provide very little protection and it is not clear whether they include any areas of the EC, we consider that in the event they are relevant to the CE they should be included at the permitted level for vegetation clearance in the CE.	Add to the online map layers the Environment Classification areas of relevance.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.493	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity Rules	Amend	Consequential amendment	Add a new ECO Controlled activity rule for building platform and access on existing site at the date the Plan becomes operative, within residential zones. Where indigenous vegetation clearance is for the purpose of the



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						establishment of a building platform and access to an existing building site where there is no existing residential building. Ensure this rule applies both outside and within the CE and within residential zones. Matters of control to include effects on indigenous biodiversity and protect any significant natural area(s).
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.494	Ecosystems and Indigenous Biodiversity	ECO - R5	Amend	Consequential amendment	Amend ECO - R5 to include specific provision for indigenous vegetation clearance or disturbance where this is in accordance with an approved Plan or permit issued under the Forests Act 1949 as follows: "Where: ... <b>4. The indigenous vegetation clearance or disturbance is in accordance with an approved Plan or permit issued under the Forests Act 1949 and is outside the Coastal Environment; and ...</b> "  3. Amend ECO- R5 "Activity status where compliance is not achieved" so that non-compliance with the new condition 4 added above becomes discretionary and becomes noncomplying within a significant natural area.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.495	Ecosystems and Indigenous Biodiversity	ECO - R3	Oppose	Alternative relief	Delete ECO - R3 and rely on the ECO Discretionary and Non -Complying rules to capture this activity.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.496	Ecosystems and Indigenous Biodiversity	ECO - R5	Amend	Forest & Bird considers that this rule should be amended to specifically provide for the maintenance and purposes we consider appropriate for ECO-R1 where the limits in that rule are not met.	Activity Status Restricted Discretionary Where: <b>The clearance is for the purposes and activities specified in Condition 2 of Rule ECO-R1; or the clearance is for the purpose of upgrading or construction of the National Grid where: a. The works corridor does not exceed 3m in width; and b. All machinery used in construction is cleaned and made free of weed material and seeds prior to entering the site; and c.</b>

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						Rehabilitation of disturbed areas is undertaken following the completion of construction; or 3. The clearance is for the purpose to upgrade or create new public walking or cycling tracks up to 3m in width undertaken by the Council or its approved contractor; or 4. The indigenous vegetation clearance or disturbance is in accordance with an approved Plan or permit issued under the Forests Act 1949 and is outside the Coastal Environment; and ...
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.497	Ecosystems and Indigenous Biodiversity	ECO - R5	Amend	the upgrading and construction of National Grid activities supported by national policy direction within limits may be appropriately considered here rather than in ECO -R1 as appropriate matters of restriction can be identified.	<b>...6. An assessment in accordance with Appendix 1 of the WCRPS demonstrates that the clearance and disturbance is not within a Significant Natural Area(s); and</b> Discretion is restricted to: <del>Whether there are other regulations impacting the site that have meant the land is unable to be used for economic rural uses; Constraints imposed by b. The functional or operational need of the national grid for the location network utilities and critical infrastructure; ...</del>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.498	Ecosystems and Indigenous Biodiversity	ECO - R5	Support	Matter c should include "at risk" to align with the NZCPS.	...c. Effects on habitats of any threatened, <b>at risk</b> , or protected species; ..
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.499	Ecosystems and Indigenous Biodiversity	ECO - R5	Amend	In matter h. of the restriction of discretion it would be clearer to use wording that captures the matters rather than refer to specific policy.	h. The <b>maintenance and protection of indigenous biodiversity matters</b> outlined in <del>Policies ECO - P6 and ECO - P7.</del>
Royal Forest and Bird Protection Society of New	S560.500	Ecosystems and Indigenous Biodiversity	ECO - R5	Amend	A consequential amendment should be made to Advice not 1 for consistency. Advice note 4 is no longer required	Amend Advice Note: 1. Where indigenous vegetation clearance is proposed within the riparian margin of a waterbody <b>also</b> refer to

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Zealand Inc. (Forest & Bird) (S560)					given the limited activities provided under condition 1, 2 and 3.	<b>the Natural Character and the Margins of Waterbodies (NC) chapter provisions.</b> this section of the Plan for the Rules around this clearance. 2. Where indigenous vegetation clearance is proposed in or on a site or area of significance to Māori then Rule SASM - R4 will also apply. 3. Where indigenous vegetation clearance is proposed within a wetland this is also subject to rules within the NES - Freshwater and Regional Land and Water Plan which are administered by the West Coast Regional Council. <del>4. This rule also applies to Plantation forestry activities, where this provision is more stringent than the NES - PF and the indigenous vegetation clearance is within the coastal environment."</del>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.501	Ecosystems and Indigenous Biodiversity	ECO - R5	Amend	Under the activity status where compliance is not achieved it would be helpful to state the Discretionary rules that apply.	Under the activity status where compliance is not achieved make amendments as necessary to state the specific Discretionary rules that apply, for example ECO - R7 and the relevant CE rules.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.502	Ecosystems and Indigenous Biodiversity	ECO - R4/SUB - R7	Amend	Activities that would not protect SNAs should not be anticipated within them. This requires a non-complying activity status.	Amend: Activity status where compliance not achieved as follows: <del>NA</del> <b>Where Condition 1 is not achieved Rules ECO - R7A Discretionary or ECO - R8A Non-complying apply.</b>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.503	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity Rules	Amend	For activities that may be appropriate but of a larger scale than provided for as permitted or restricted discretionary, a full discretionary status rule is appropriate to provide for a full assessment of effects.	Add a new Discretionary rule as follows: <b>ECO - R7A Vegetation clearance within a Significant Natural Area(s), including indigenous vegetation clearance not meeting ECO - R5 Activity Status Discretionary Where: 1. The vegetation clearance is within a SNA identified in Schedule Four, or 2. An assessment in accordance with Appendix 1 of the WCRPS demonstrates that the clearance or disturbance is within a Significant Natural</b>

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						<b>Area(s), and3. the activity is for the purposes specified in Conditions 1 to 3 of ECO - R5Advice Note:1. Where assessing resource consents for indigenous vegetation clearance under this rule, assessment against the policies of both the Ecosystems and Biodiversity Chapter and Natural Features and Landscapes Chapters will be required.2. This rule also applies to Plantation forestry activities, where this provision is more stringent than the NES - PF.Activity status where compliance not achieved: Non-complying under ECO - R8A</b>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.504	Ecosystems and Indigenous Biodiversity	ECO - R7	Amend		Add a new ECO Non-complying rule as follows: <b>ECO - R8A vegetation clearance not meeting ECO - R7AActivity Status Non-ComplyingAdvice Note:1. This rule also applies to Plantation forestry activities, where this provision is more stringent than the NES - PF.Activity status where compliance not achieved: N/A</b>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.505	Ecosystems and Indigenous Biodiversity	Overview	Amend		Include a definition of vegetation/indigenous vegetation
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.506	Natural Features and Landscapes	NFL - R3	Support	It may be appropriate for emergency hazard mitigation works, with clear parameters around that.	Alternatively limit to emergency hazard mitigation works only and include clear parameters around what is permitted.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.507	Natural Features and Landscapes	NFL - R10	Support	Many of these activities may not be appropriate in an ONFL, and as such, the Council should retain the ability to decline consent.	Amend to make restricted discretionary.

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Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.508	Natural Character and Margins of Waterbodies	NC	Oppose	Forest & Bird makes a number of overarching submissions in relation to this chapter:	2. In relation to the Earthworks chapter, we submitted that any vegetation clearance associated with earthworks should be managed by the ECO chapter. We make a similar submission here - all vegetation clearance associated with earthworks must be governed by rules at least as, if not more, stringent, than the ECO chapter as amended by our submission.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.509	Natural Character and Margins of Waterbodies	NC	Oppose	In terms of wetlands, this chapter appears to duplicate regulation of activities that are regulated in the margins of 'natural wetlands' under the NESFM. The provisions in this chapter are more lenient than the NESFM, contrary to reg. 6 NESFM.	This chapter needs to be thoroughly revised to remove duplication of the NESFM. Those rules will need to be deleted unless they are more stringent than the NESFM. It will also need to include provisions that apply to the margins of wetlands other than 'natural wetlands,' to ensure that these are protected in line with RMA requirements.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.510	Natural Character and Margins of Waterbodies	NC	Oppose	Consequential amendment	6. Amendments also need to be made to the Subdivision rules to ensure that waterbodies and their margins are protected in the subdivision process.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.511	Natural Character and Margins of Waterbodies	Overview	Amend	The Overview needs to be clearer about the relationship between the provisions in this chapter and those in the ECO and EW chapters.	Include a clear explanation about the relationship between the provisions in this chapter and those in the ECO and EW chapters.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.512	Natural Character and Margins of Waterbodies	NC - O1	Amend	It does not give enough direction to the protection of natural character.	Further, amendments need to be made to the subdivision rules to ensure this objective is met. The rules in this chapter do not regulate subdivision.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.513	Natural Character and Margins of Waterbodies	NC - O3	Amend	Alternative relief	Amend: To <b>consider providing</b> <del>provide</del> for activities which have a functional need to locate in the margins of lake, rivers, and wetlands, where they can be undertaken in a way that preserves

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Zealand Inc. (Forest & Bird) (S560)						<del>the in such a way that the impacts on natural character are minimised.</del>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.514	Natural Character and Margins of Waterbodies	NC - P1	Amend	Consequential relief	Amend, or provide additional provisions in the Subdivision rules to ensure this policy is given effect to.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.515	Natural Character and Margins of Waterbodies	NC - P3	Oppose	There should not be policy direction enabling activities within the riparian margins of waterbodies.	Delete
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.516	Natural Character and Margins of Waterbodies	Natural Character and the Margins of Waterbodies Rules	Amend	Policy 4 does not appear to have any methods to achieve it.	Include specific methods in the Plan to achieve this policy 4
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.517	Natural Character and Margins of Waterbodies	NC - R3	Amend	It is not a more lenient standard than the rules in the ECO or EW chapter	Include a non-complying rule for activities in riparian margins likely to cause significant adverse effects.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.518	Natural Character and Margins of Waterbodies	NC - R4	Amend	It is not a more lenient standard than the rules in the ECO or EW chapter	Include a non-complying rule for activities in riparian margins likely to cause significant adverse effects.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.519	Natural Character and Margins of Waterbodies	NC - R5	Amend	It is not a more lenient standard than the rules in the ECO or EW chapter	Include a non-complying rule for activities in riparian margins likely to cause significant adverse effects.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.520	Financial Contributions	FC - R1	Amend	Alternative relief	Amend to make clear that this does not derogate from the requirement to manage adverse effects in accordance with the Plan, and that this rule does not provide for financial contributions for effects on biodiversity or landscape.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.521	Subdivision	Overview	Amend	This chapter lacks any reference to other relevant chapters.	Amend to include reference to other relevant chapters.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.522	Subdivision	Overview	Amend	Subdivision can adversely impact wetlands and other water bodies by, for example, fragmentation.	Consider including new rules, or amendments to existing rules to avoid effects on waterbodies and their margins in the subdivision process, in a similar way as is sought for SNAs below.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.523	Subdivision	Subdivision Rules	Amend		Change all references to Schedule Four so that they apply to Significant Natural Areas, which includes those that are not in schedule four, as per the definition of Significant Natural Area in the WCRPS.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.524	Subdivision	SUB - R3	Amend	It is not clear if a boundary adjustment could adversely affect a significant natural area.	Add a conditions/standard to SUB - R3 to ensure that the boundary adjustment does not result in a boundary through a Significant Natural Area. Add a matter of control to SUB - R3 for assessment against the significant criteria in Appendix 1 of the WCRPS.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.525	Activities on the surface of water	Activities on the surface of water	Amend	Non-commercial motorised activities on the surface of water can have adverse effects on indigenous fauna, as a result of noise and disturbance, particularly if it is cumulative.	Amend ASW P2 to delete 'significantly'.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.526	Activities on the surface of water	Activities on the surface of water	Amend	Non-commercial motorised activities on the surface of water can have adverse effects on indigenous fauna, as a result of noise and disturbance, particularly if it is cumulative.	Amend ASW P3.b. to delete 'significant'.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.527	Activities on the surface of water	Activities on the surface of water	Amend	A permissive approach to non-commercial motorised craft, however, is concerning as managing the cumulative adverse effects is nigh on impossible.	Amend rules to make consequential changes to give effect to policy amendments, and to ensure that the NZCPS is given effect to in the rules.

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Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.528	Activities on the surface of water	Activities on the surface of water	Amend	ASW - R7 applies to craft under permitted and restricted discretionary rules which do not specifically exclude motorised craft other than on the waterbodies identified in AWS - R2 or where they relate to commercial activities under AWS - R6.	Amend ASW - R7 so that it applies to "Use of Motorised Watercraft for Non- Commercial Use, Commercial Activities, and Structures on the Surface of Water, other than where the activity is provided for as a not meeting Permitted, Controlled or restricted Discretionary Activity in the ASW rules.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.529	Coastal Environment	Overview	Amend	This is also uncertain with respect to Policy 11 of the NZCPS which is only directly referred to in relation to Plantation Forestry and obliquely in relation to "Other relevant" provisions where reference to indigenous biodiversity in relation to vegetation clearance are location in the ECO chapter.	Amend the overview to clearly set out how Policy 11 is given effect to in the Plan and explain the relationship between vegetation clearance and the policy 13 and 15 matters addressed in the CE chapter.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.530	Coastal Environment	CE - P1	Amend	Nor is it clear under this policy whether such mapping is included in the Plan.	Clarify terminology throughout the Plan so it is clear whether the Coastal Environment is an "overlay" or just a map layer.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.531	Coastal Environment	CE - R14	Amend		Add matters of discretion for " <b>effects on natural character, including High natural character, natural landscapes and features of the coastal environment.</b> "
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.532	Coastal Environment	CE - P2	Amend	The Policy fails to include all aspects of Policies 13 and 15 where preservation is to be achieved as set out in the NZCPS.	Make additional amendments as necessary to ensure that vegetation clearance which may adversely affect natural character, natural landscapes and features beyond outstanding and high overlays avoids significant adverse effects and avoids, remedies, or mitigates other adverse effects. This will include: <ul style="list-style-type: none"> <li>the amendments sought to ECO-R1 and ECO - R2 above are as it restricts indigenous vegetation</li> </ul>



Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<p>clearance in the CE to certain purposes within limits.</p> <ul style="list-style-type: none"> <li>A matter of discretion in ECO - R5 for consideration of adverse effects on natural character, natural landscapes, and features in the CE.</li> </ul>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.533	Coastal Environment	Coastal Environment Rules	Amend	The approach to buildings and structures and to maintenance, repair, upgrades, minor upgrades, reconstruction, and establishment of new buildings is complex, and often has inadequate conditions to manage adverse effects at the permitted activity level.	Amend: Additions and alterations are addressed across the coastal environment within the same rule as for new buildings and structures
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.534	Coastal Environment	Coastal Environment Rules	Amend	It is unclear whether maintenance of some infrastructure, for tracks and fences is provided for at the permitted level	Amend: That provision for minor upgrades on the National Grid may be appropriate at the permitted level given the distinction from other upgrades under the NPS for ET, but that other upgrades for infrastructure more restricted requirements as for new activities should apply.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.535	Natural Hazards	Permitted Activities	Amend	Some permitted rules for specified activities include earthworks while others do not.	Amend: There is one permitted activity rule for maintenance and repair of natural hazard mitigation structures including earthworks
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.0536	Coastal Environment	CE - R1	Amend		Add and amend the following conditions to CE-R1: Where: <b>1. The building, structure, infrastructure, fence, accessway, cycle/walking or farm track is lawfully established; and2. Any indigenous vegetation clearance complies with ECO-R1; and3. Earthworks and land disturbance does not exceed 50m3 or extend beyond 10 meters of a building or structure and 2 meters of an accessway or track.4. There is</b>

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<p><b>no alteration or addition to the structures height and area footprint is not increased; and5. The width or length of any access or track is not increased; and6. Works are not undertaken within 10m of any hazard mitigation/protection measure that exists within the coastal environment; and47.</b></p> <p>When the maintenance and repair is within an area of High Coastal Natural Character or the Outstanding Coastal Environment <b>Area:</b> The activity is limited to what is necessary to maintain the existing structure, within the footprint or modified ground compromised by the existing structure; <del>andThe activity does not involve the installation of any new structures."</del></p>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.0537	Coastal Environment	CE - R1	Amend		Set the activity status where compliance is not achieved is Restricted discretionary or discretionary and refer to specific rules where possible
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.0538	Rural Zones	RURZ - P18	Amend	Alterative Relief	Amend to ensure that natural values must be protected in accordance with Chapter 7 WCRPS and other natural values have specific reference for protection.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.0539	General Rural Zone	GRUZ - R32	Amend		This also needs to include a requirement to undertake an ecological assessment in accordance with Appendix 1 WCRPS.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.0540	General Rural Zone	GRUZ - R32	Amend		The rule should make it clear that any vegetation clearance associated with mining activities is regulated by the ECO chapter, and that the objectives and policies of that chapter apply.

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Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.0541	SPZ - Special Purpose Zones	SPZ - Special Purpose Zones	Amend		Amend to make clear that all vegetation clearance is dealt with by the ECO (and NC) chapter, in both the zone overviews and amend any relevant provisions within each chapter to that effect, and further that the ECO objectives and policies may be relevant to other activities
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.0542	SPZ - Special Purpose Zones	SPZ - Special Purpose Zones	Amend		Amend all mining activities require consent (except NOSZ where they should be prohibited), and an ecological assessment in accordance with Appendix 1 of WCRPS is required for all mining activity consent applications.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.0543	Rural Zones	Rural Zones	Amend		make clear that all vegetation clearance is dealt with by the ECO chapter
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.0544	Rural Zones	Rural Zones	Amend		all mining activities require consent (except NOSZ where they should be prohibited), and an ecological assessment in accordance with Appendix 1 of WCRPS is required for all mining activity consent applications.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.0545	Open Space and Recreation Zones	OSRZ - P19	Amend	It is not clear how the 'intended purpose, character, and qualities' of the NOSZ will be ascertained to a level that would assist in consent decision making.	Amend to include more clarity on what is to be achieved by a.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.0546	Open Space and Recreation Zones	OSRZ - P20	Amend	Alternative Relief	Delete a. and amend b., replace 'conservation' with 'biodiversity and natural'.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.0547	Open Space and Recreation Zones	OSRZ - P10	Amend		Consistent with amendments sought to SUB provisions, make amendments as appropriate to support the approach that subdivision in NOSZ is not generally appropriate or an anticipated activity in the Plan.

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Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.0548	Natural Open Space Zone	Overview	Amend		All activities will also <del>have regard to</del> be <b>consistent with</b> any relevant reserve management Plans, national park management Plans or national legislation (Reserves Act 1977 or Conservation Act 1997 or <b>National Parks Act 1980</b> ).
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.0549	Natural Open Space Zone	Overview	Amend		<b>New mining activity on public conservation land is prohibited and existing mining activity will be phased out on public conservation land as resource consents and permits expire.</b>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.0550	Open Space Zone	OSZ - R22	Amend	Subsequent amendment	Include at least a discretionary consent requirement for all mining activities, including prospecting, explorations, extraction, processing, and ancillary activities.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.0551	Open Space Zone	OSZ - R22	Amend	The OSZ is also likely to include areas of indigenous vegetation and habitat for indigenous fauna that meets one or more of the WCRPS significance criteria.	Include a requirement in that rule/those rules to undertake an ecological assessment in accordance with Appendix 1 of the WCRPS.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.0552	Open Space Zone	OSZ - R22	Amend	The purpose of OSZ is to provide a range of passive and active leisure and recreational activities. This is important for community wellbeing and as such is fundamentally incompatible with mineral prospecting and exploration.	Also include a note that all vegetation clearance associated with mining activities is dealt with under the ECO chapter.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.0553	Open Space and Recreation Zones	Overview	Support	Both the district wide and specific zone chapter provisions should also apply in all cases/for all chapters.	Add: <b>In addition to the rules in these zone chapters, the provisions in the district-wide chapters will also apply. This includes provisions and rules that apply both within overlays, and outside of them. This includes the following chapters:(List chapters for clarity)</b>
Royal Forest and Bird Protection Society of New	S560.0554	Open Space and Recreation Zones	Overview	Amend		Amend: The NOSZ - Natural Open Space Zone is where the Plan recognises and provides for open ..spaces that contain high

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Zealand Inc. (Forest & Bird) (S560)						natural and ecological values. The Zone is made up of the most <b>ecologically</b> significant open space and reserves where natural values predominate such as National Parks, Nature Reserves, Scientific Reserves, Wilderness Areas and Specially Protected Areas as well as other areas of public conservation land identified with very high natural values. <b>This includes private land held under QEII covenant, areas owned and managed by Forest &amp; Bird for conservation purposes and may include for continuity significant natural areas over private land.</b>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.0555	Open Space and Recreation Zones	Overview	Amend	The statement regarding the Department of Conservation is also not completely accurate. Section (4)(3) RMA provides that DOC is only exempt under the RMA if the work or activity is consistent with a conservation management strategy, conservation management Plan, or management Plan established under the Conservation Act or other relevant Act.	Amend the following paragraph: "The OSZ - Open Space Zone is open spaces that are used predominantly for a range of passive and active leisure and recreational activities, along with limited associated facilities and structures. <del>A large area of the public conservation lands administered by the Department of Conservation falls within this zone.</del> At a district level the open spaces...The nature of the West Coast, with its extensive mineral deposits, <del>combined with 84% of the land area being located in public conservation estate,</del> means that <del>some</del> provision is <del>also</del> made for mineral extraction within the Open Space Zone.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.0556	Open Space and Recreation Zones	OSRZ - Open Space and Recreation Zones Policies	Amend		Put specific zone policies within the section/chapter they relate to. Add an explanation in the overview of each open space chapter that the generic OSRZ objectives and policies also apply.

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Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.0557	Light	Light Rules	Amend	The rules need to be amended to protect the fauna, in particular the Westland Black Petrel.	Amend permitted activities to exclude any light sources that are in or near habitat of indigenous fauna, in particular the Westland Black Petrel. No overnight lighting in these areas should be permitted (see next submission point). These activities should require at least a discretionary consent.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.0558	Light	Light Rules	Amend	It is not clear that the rules adequately provide for the significant habitats of fauna.	Include new rules, or amend existing, to ensure that areas of significant biodiversity (including ones that aren't on Schedule Four), wherever they occur, are protected by the rules. Any artificial light at night in these areas should require consent.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.0559	Light	LIGHT - P2	Amend	B. should include some direction to avoid effects on indigenous biodiversity where possible.	Amend b. Artificial outdoor lighting for the purpose of emergency response or public health and safety, <b>which complies with P2 as much as possible.</b>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.0560	Coastal Environment	CE - R14	Amend		Add matters of discretion for " <b>effects on natural character, natural landscapes and features of the coastal environment.</b> "
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.0561	Coastal Environment	CE - R19	Amend		Make similar amendments as sought for CE - R12 above to capture all activities where compliance is not achieved with preceding rules.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.0562	Earthworks	EW - R7	Support		Retain matters of discretion.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.0563	Earthworks	EW - R7	Support		The advice note at the bottom of R8 should be amended in line with Key Issue above.

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Zealand Inc. (Forest & Bird) (S560)						
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.0564	Coastal Environment	CE - R11	Amend	Alternative relief	Amend R11 to include appropriate limits and to refer to the CE permitted activities it relates to. Ensure that limits for earthworks are not more than required to meet the limits to the scale of permitted activities sought in Forest & Birds submissions.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.0565	Coastal Environment	CE - R8	Amend	Provision to additions and alteration as a permitted activity should only be for lawfully established buildings and structures.	Include a condition that the building or structure is lawfully established.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.0566	Coastal Environment	CE - R8	Amend	Upgrades are generally addressed separately to maintenance and include limits add provision for upgrades of lawfully established network utility infrastructure and electricity generation activities in R8.	Add a condition including upgrades of lawfully established network utility infrastructure and for electricity generation activities where the limits in Conditions 1 and 2 are met.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.0567	Coastal Environment	CE - R8	Amend	The permitted rules for additions and alteration are not clearly set out, being included with other maintenance activity in R5 and only specified under R8 for Outstanding areas and not set out for the CE generally.	Set the activity status where compliance is not achieved is Discretionary where conditions specific to Outstanding Coastal Environment Areas is not met and otherwise RD.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.0568	Coastal Environment	CE - R8	Support	Permitted rules should also be crafted to ensure that adverse effects on the environment as a result of a permitted activity would be no more than minor.	Add: <b>4. Any fill, excavation or removal is not more than 100m2 and 100m3.</b>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.0569	Coastal Environment	CE - R18	Amend	While these activities are set out in Condition 1 it makes the scope of the rule in the heading somewhat unclear.	Retain the scope of activities under this rule as set out in Condition 1.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.0570	Coastal Environment	CE - R18	Amend		Clarify that "existing" is existing at the time the Plan becomes operative.

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Zealand Inc. (Forest & Bird) (S560)						
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.0571	Coastal Environment	CE - R18	Amend	Condition 2 does not add any certainty to the rule.	Delete Condition 2 or set a measurable limit
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.0572	Coastal Environment	CE - R18	Amend	Matter of discretion "i. area and location of vegetation clearance" this implies that earthworks could include vegetation clearance. It is not clear whether or not such vegetation clearance includes "indigenous vegetation clearance". In our view it should not as indigenous vegetation clearance should be subject to ECO provisions as explained in the Overview of the CE chapter.	Add matters of discretion: <b>The location of the activity on the site; and Whether the site includes significant natural area on applying the WCRPS Appendix 1 criteria and effects on the values in that area(s).</b>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.0573	Coastal Environment	CE - R22	Amend	Subsequent amendment	Amend CE - R22 to Prohibited activity status and to capture non-compliance with CE - R19
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.0574	Coastal Environment	CE - R20	Amend		Amend: Afforestation with Plantation Forestry in the Outstanding Coastal Environment Area, <b>High Coastal Natural Character overlay</b> , or any Significant Natural Area identified in <del>Schedule Four</del> in the Coastal Environment, <b>not meeting CE - R20A</b> Activity Status <b>Non-Complying Discretionary</b> <del>Where: 1. These will not destroy any Outstanding Natural Feature identified in Schedule Six or the values which make it Outstanding.</del> Advice Note: When assessing resource consents under this rule, assessment against the relevant Coastal Environment, Ecosystems and Indigenous Biodiversity, Natural Features and Landscapes



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						<p>policies will be required.</p> <p>This rule also applies to Plantation forestry activities where this provision is more stringent than the NES - PF.</p> <p>Activity status where compliance not achieved:<del>N/ANon-complying</del></p>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.0575	Coastal Environment	CE - R2	Amend		<p>Adding the following condition: <b>2. The Council must be notified in writing 10 days ahead of any works to be undertaken within 10m of any hazard mitigation/protection measure that exists within the coastal environment.</b></p> <p>Retain the advice note that indigenous vegetation clearance is subject to the ECO chapter.</p>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.0576	Coastal Environment	CE - R3	Amend		<p>Include a condition that the activities do not occur within Outstanding coastal areas or include conditions to ensure Policies 13 and 15 of the NZCPS are achieved.</p>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.0577	Coastal Environment	CE - R3	Support		<p>Retain the advice note that indigenous vegetation clearance is subject to the ECO chapter and add an advice note that earthworks are subject to provisions of the EW chapter.</p>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.0578	Coastal Environment	CE - R4	Amend	<p>The statement in the rule CE - R4 condition 2. b. that these activities are subject to provisions in those other chapters also fails to recognise that the activities are (or should be) subject to provisions in the CE chapter.</p>	<p>Add the following conditions to CE - R4:</p> <p><b>2. new buildings and structuresWithin the NOSZ - Natural Open SpaceZone, OSZ - Open Space Zone and SARZ - Sport and Active Recreation Zones, this is limited to parks facilities or parks furniture undertaken by a network utility provider; orin the Māori Purpose Zone is proved for under CE - R3; orIn all other zones:Any new building is no more than 100m ground floor area;The maximum height above ground level is for any building or</b></p>

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						<p>structure is 7m;Earthworks are for the establishment of a building platform and access to a building site in an approved subdivision or where there is no existing residential building on the site; and any earthworks are limited the matters in 2. a, c and d. and to fill, excavation or removal of material being no more than 250m2 and 250m3."</p> <p>Amend the following condition in CE - R4: b. Are Energy Activities or Network Utilities, including ancillary earthworks, <del>subject to provisions</del> <b>which are permitted activities under Rules</b> in the Energy, Infrastructure and Transport Chapters of the Plan; <del>or. Are natural hazard mitigation structures constructed by a Statutory Agency or their authorised contractor."</del></p>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.0579	Coastal Environment	CE - R5	Amend	Condition 1 matters for maintenance and repair are already provided for within R1.	Delete "operation" from condition 1.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.0580	Coastal Environment	CE - R5	Support	The provision for minor upgrade with respect to the National Grid is consistent with the NPS- ET however extending this to other network utilities and renewable electricity generation creates uncertainty.	Limit minor upgrades to the National Grid and retain with maintenance and repair activities.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.0581	Coastal Environment	CE - R5	Amend	The provision for minor upgrade with respect to the National Grid is consistent with the NPS- ET however extending this to other network utilities and renewable electricity generation creates uncertainty.	Include upgrades for network utilities or renewable electricity generation activities within rules for new structures (e.g., CE - R8) to ensure that condition for the scale and effects are appropriate or as consented activities.

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Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.0582	Coastal Environment	CE - R5	Amend	Condition 4 is not appropriate to apply in the Natural Open Space zone.	Include clause c. of condition 4 in to CE -R8 as it relates to additions to buildings. Clarify the rule so it is clear that Condition 4 does not apply in the NOSZ which is limited to the matters in Condition 2.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.0583	Coastal Environment	CE - R5	Amend	Condition 3 already appears to be provided for within CE- R3 however as discussed at that rule it is not clear whether activities will protect in accordance with Policies 13 and 15 of the NZCPS.	Make amendments to provide for the matters in Condition 3 also outside of High and Outstanding areas. Include amendments so that these matters are limited to provision from network utility providers and council.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.0584	Coastal Environment	CE - R10	Amend	Alternative relief	Amend R10 or combine the activities listed into other CE rules that already provide for these activities and for earthworks, within limits that protected the Outstanding Coastal Area. The expectation is that these limits will be more stringent than those set out for other areas of the coastal environment sought in this submission.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.0585	Coastal Environment	CE - R12	Amend	As currently drafted it is not clear that this rule would provide activities in R6 and R9 where permitted standards of those rules are not met.	Amend CE - R12 to ensure it provides for noncompliance with R6 and R9 as set out in those rules. For example, by including the following condition: <b>"Where: A. the maintenance, alteration, repair, or reconstruction is for natural hazard mitigation structure that has been lawfully established; and</b>  Amend the conditions as follows: <b>X. provided that only clean fill is used where fill materials are part of the structure;"</b> These are to protect the <b>existing</b> coastal State Highway, Special Purpose Roads or other <b>lawfully established</b> Critical Infrastructure; <del>These are Westport flood and coastal protection works constructed by a statutory agency or its</del>

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<del>authorized contractor.</del> Add the following matters of control: " <b>k. effects on public access; and l. materials used; and m. the extent and quantity of earthworks to be undertaken is association with the natural hazards structure works.</b> "
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.0586	Coastal Environment	CE - R12	Amend	It is not clear how this rule is relevant to Plantation forestry activities and whether the note in this regard is helpful.	Amend the Advice Notes: 1. The rules in the Earthworks Chapter do not apply to Controlled Activities under Rule CE - R142.2. <del>This rule also applies to Plantation forestry activities where this provision is more stringent than the NES - PF.</del>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.0587	Coastal Environment	CE - R12	Support		Amend the Activity status where compliance not achieved as follows: <b>for maintenance, alteration, repair, or reconstruction with standard 2: Restricted Discretionary.</b> <del>except</del> In all other cases: Discretionary <del>where these are within the Outstanding Coastal Environment Area</del>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.0588	Earthworks	EW - P2	Amend	Further, it should be made clear that effects, in particular effects on biodiversity, must be managed in accordance with the ECO provisions.	Add an amendment to make it clear that effects on biodiversity at least are managed in accordance with the ECO provisions. Consider amendments to ensure that this chapter does not apply a lesser standard of effects management than other chapters in the Plan, e.g., NFL.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.0589	Open Space Zone	Overview	Amend	Remove the words "and large areas of public conservation land" from the second paragraph.	Historic Reserves and large areas of public conservation land fall within this zone.
Royal Forest and Bird Protection Society of New	S560.0590	Open Space Zone	Overview	Amend	Amend wording of last sentence "have regard" to "be consistent with" Remove Conservation Act 1980	All activities will also <del>have regard to be</del> <b>consistent with</b> any relevant reserve management Plans Reserves Act 1977 <del>or</del>

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Zealand Inc. (Forest & Bird) (S560)					because all public conservation land should be NOSZ.	<del>Conservation Act 1987</del>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.0591	Open Space Zone	OSZ - R11	Amend	Mineral Prospecting and Mineral Exploration should not be permitted or restricted discretionary in the OSZ.	Include at least a discretionary consent requirement for all mining activities, including prospecting, explorations, extraction, processing, and ancillary activities.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.0592	Open Space Zone	OSZ - R11	Amend	The OSZ is also likely to include areas of indigenous vegetation and habitat for indigenous fauna that meets one or more of the WCRPS significance criteria.	Include a requirement in that rule/those rules to undertake an ecological assessment in accordance with Appendix 1 of the WCRPS.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.0593	Open Space Zone	OSZ - R11	Amend	The OSZ is also likely to include areas of indigenous vegetation and habitat for indigenous fauna that meets one or more of the WCRPS significance criteria.	Also include a note that all vegetation clearance associated with mining activities is dealt with under the ECO chapter.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.0594	Open Space Zone	OSZ - R19	Amend	The OSZ is also likely to include areas of indigenous vegetation and habitat for indigenous fauna that meets one or more of the WCRPS significance criteria.	Include a requirement in that rule/those rules to undertake an ecological assessment in accordance with Appendix 1 of the WCRPS.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.0595	Open Space Zone	OSZ - R19	Amend	The OSZ is also likely to include areas of indigenous vegetation and habitat for indigenous fauna that meets one or more of the WCRPS significance criteria.	Also include a note that all vegetation clearance associated with mining activities is dealt with under the ECO chapter.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.0596	Open Space Zone	OSZ - R22	Amend	Mineral Prospecting and Mineral Exploration should not be permitted or restricted discretionary in the OSZ.	Include at least a discretionary consent requirement for all mining activities, including prospecting, explorations, extraction, processing, and ancillary activities.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.0597	Open Space Zone	OSZ - R22	Amend	Mineral Prospecting and Mineral Exploration should not be permitted or restricted discretionary in the OSZ.	Delete Permitted and Restricted Discretionary Activities.
Royal Forest and Bird Protection	S560.0598	Open Space Zone	OSZ - R22	Amend	The OSZ is also likely to include areas of indigenous vegetation and habitat for	Include a requirement in that rule/those rules to undertake an ecological assessment in

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Society of New Zealand Inc. (Forest & Bird) (S560)					indigenous fauna that meets one or more of the WCRPS significance criteria.	accordance with Appendix 1 of the WCRPS.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.0599	Open Space Zone	OSZ - R22	Amend	The OSZ is also likely to include areas of indigenous vegetation and habitat for indigenous fauna that meets one or more of the WCRPS significance criteria.	Also include a note that all vegetation clearance associated with mining activities is dealt with under the ECO chapter.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.0600	Open Space Zone	OSZ - R19	Amend	Mineral Prospecting and Mineral Exploration should not be permitted or restricted discretionary in the OSZ.	Include at least a discretionary consent requirement for all mining activities, including prospecting, explorations, extraction, processing, and ancillary activities.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.0601	Open Space Zone	OSZ - R12	Amend	Agricultural, Horticultural or Pastoral Activities could be incompatible with the main purpose of Open Space Zone and may have adverse effects on areas of significant biodiversity.	Include a requirement in that rule/those rules to undertake an ecological assessment in accordance with Appendix 1 of the WCRPS. Also include a note that all vegetation clearance associated with mining activities is dealt with under the ECO chapter.
Runanga Miners Hall Trust (S498)	S498.001	SCHED1A-SCHEDULE OF HISTORIC HERITAGE ITEMS AND AREAS	SCHED1A - SCHEDULE OF HISTORIC HERITAGE ITEMS AND AREAS	Amend	Recognise the geologically defined area: the "Greymouth Coalfield" (see map below)	Amend to include the Historic Mining Area of the Southern Paparoas, the Greymouth Coalfield and 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, and the sites of several old towns such as Rewanui, Wallsend and Brunnerton.
Rural Contractors New Zealand Incorporated ("RCNZ") (S489)	S489.001	Interpretation	Definitions	Amend	Rural contractor depots would fall under "rural industry" - however in many cases small-scale rural contractor depots can be a business extension for an existing farming operation. RCNZ is seeking a new rule permitting small-	New definition for "rural contractor depot": The land and buildings used for the purposes of storing or "an industry or business undertaken in a rural environment that directly supports, maintaining machinery, equipment and associated goods and supplies associated

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					scale rural contractor depots and a definition will assist in this.	with a rural contracting business that directly supports, services or is dependent on primary production.
Rural Contractors New Zealand Incorporated ("RCNZ") (S489)	S489.002	STRATEGIC DIRECTION	AG - O2	Support		Retain as notified
Rural Contractors New Zealand Incorporated ("RCNZ") (S489)	S489.003	Rural Zones	Overview	Support in part	The sixth paragraph states one of the key points in the strategic directions for Ag is to maintain productive values and agricultural viability -this does not also emphasise the importance of the support industries and services as stated in the strategic objective	Amend the sixth paragraph as follows: Key points to note are: <ul style="list-style-type: none"> <li>The strategic direction for AG - Agriculture to maintain productive values and maintain agricultural viability <b>including through enabling support industries and services.</b></li> </ul>
Rural Contractors New Zealand Incorporated ("RCNZ") (S489)	S489.004	Rural Zones	Overview	Support in part	The seventh paragraph of the overview section states primary production uses are the major activities within the GRUZ - General Rural Zone. Consistent with the strategic policy direction an amendment is sought that appropriately recognises rural support industries and services.	Amend the seventh paragraph of the overview section as follows: add "along with rural support industries and services" after the words "where primary production uses are the major activities"
Rural Contractors New Zealand Incorporated ("RCNZ") (S489)	S489.005	Rural Zones	RURZ - P6	Support	The policy recognises the functional need for some activities to locate in rural areas.	Retain the policy as notified.
Rural Contractors New Zealand Incorporated ("RCNZ") (S489)	S489.006	General Rural Zone	Permitted Activities	Support	All rural contractor depots are currently caught by the rural industry rule. A new Permitted Activity for small scale depots as a business extension of an existing farming operation is needed.	Include a new Permitted Activity for Rural Contract Depots Where: <ol style="list-style-type: none"> <li>All performance standards for GRUZ R1 are complied with</li> <li>The maximum number of staff is 7 (other than those living on site)</li> <li>The rural contractor depot (including associated vehicle access, parking and manoeuvring areas is set back</li> </ol>

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						at least 50m from any existing sensitive activity. Activity status where compliance not achieved: Restricted Discretionary.
Rural Contractors New Zealand Incorporated ("RCNZ") (S489)	S489.007	General Rural Zone	Restricted Discretionary Activities	Amend	Along with the new Permitted Activity rule an RDA escalation rule is required.	Add a new Restricted Discretionary Rule for Rural Contractor Depots. Matters of Discretion: <ol style="list-style-type: none"> <li>1. Bulk and location of buildings</li> <li>2. Management of access, traffic and parking</li> <li>3. Management of noise, lighting and dust</li> <li>4. Landscape measures</li> <li>5. Methods of water supply, wastewater treatment and disposal; and</li> <li>6. Any requirement for financial contributions.</li> </ol> Activity status where compliance not achieved: N/A
Rural Contractors New Zealand Incorporated ("RCNZ") (S489)	S489.008	General Rural Zone	GRUZ - R21	Oppose in part	The rule would include rural contractor depots.	Amend the rule to exclude Rural Contractor Depots.
Russell and Joanne Smith (S477)	S477.001	Planning Maps and Overlays	Natural Features and Landscapes	Oppose	Oppose ONL 31 - The line which identifies the ONL is inappropriate and includes highly modified residential subdivision. The site is highly modified and not outstanding. The line which has been drawn to identify this overlay appears to have been arbitrarily drawn.	Align the ONL boundary with existing property lines.
Russell and Joanne Smith (S477)	S477.002	Planning Maps and Overlays	High Natural Character	Oppose	Re NCA 37 and NCA 38 - the line which identifies the HCNC is inappropriate and includes highly modified residential subdivision. The site is highly modified and not outstanding. The line which has been	Align the HCNC boundary with existing property lines



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					drawn to identify this overlay appears to have been arbitrarily drawn.	
Russell and Joanne Smith (S477)	S477.003	Natural Hazards	NHR33	Oppose	Any residential activity (by definition of "sensitive activity") will require resource consent within the Land Instability Overlay. Given that there is an approved subdivision with existing dwellings and ancillary buildings, this is unduly restrictive.	Remove Restricted discretionary activity status for existing subdivisions. Alternatively, exclude residential activities other than primary residential dwellings from this rule.
Russell and Joanne Smith (S477)	S477.004	Ecosystems and Indigenous Biodiversity	ECO - R2	Oppose	The 500m2 clearance in the coastal environment is unduly restrictive and unnecessary for the protection of the coastal character or indigenous biodiversity. It does not enable clearance for a typical rural dwelling and access and is inconsistent with the underlying zoning of the property as rural residential.	Delete ECO - R2 Alternatively, increase vegetation clearance area in the coastal environment to more accurately reflect the vegetation clearance required in a typical build.
Russell and Joanne Smith (S477)	S477.005	Natural Features and Landscapes	NFL - P3	Support	Recognises that there are settlements, farms and infrastructure located within outstanding natural landscapes or outstanding natural features and provide for new activities and existing uses in these areas where the values that contribute to the outstanding natural landscape or feature are not adversely affected.	Retain as notified
Russell and Joanne Smith (S477)	S477.006	Natural Features and Landscapes	NFL - R5	Oppose	The maximum height limit above 5m for buildings and structures does not reflect the topography of the land or its intended purpose as a rural residential subdivision. The limit is unduly prohibitive.	Remove 5m building limit for established subdivisions. Alternatively, provide a more realistic building height limit which considers the sloping topography of the area, and amend relevant definitions as necessary
Russell and Joanne Smith (S477)	S477.007	Natural Features and Landscapes	NFL - R6	Oppose	The cut height is unduly restrictive and not reflective of the topography of NFL's on the West Coast. Particularly in existing subdivisions which are	Remove 1 metre cut height or alternatively provide a more generous cut height which enables residential development as intended in existing subdivisions. Remove reference to

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					intended for residential subdivision and have existing dwellings.	Coastal Environment.
Russell and Joanne Smith (S477)	S477.008	Natural Features and Landscapes	NFL - R8	Oppose	Residential buildings within an NFL are not included in the list of permitted activities, despite there being rural residential subdivisions located within the NFL. The maximum height limits for buildings is unduly prohibitive, particularly where the majority of the Coasts NFL areas are sloping in nature. The floor limits would also be unduly restrictive for a residential build which the submitter seeks to include.	Remove 3m height limit as it is arbitrary, particularly given the topography of NFL's. Alternatively, provide a more realistic building height limit which considers the sloping topography of the area. Inclusion of residential buildings as a permitted activity, and increase floor area to 250m2 minimum to enable houses.
Russell and Joanne Smith (S477)	S477.009	Natural Features and Landscapes	NFL - R10	Oppose	Controlled activity standard 2. Is ambiguous and uncertain	Delete controlled activity standard 2.
Russell and Joanne Smith (S477)	S477.010	Coastal Environment	CE - O1	Support	The submitter supports this objective which seeks to preserve the character of the coastal environment while recognising that the coastal environment is important in providing for people's social and economic wellbeing.	Retain as notified
Russell and Joanne Smith (S477)	S477.011	Coastal Environment	CE - P5	Oppose	The submitter supports the provision for buildings and structures within the coastal environment, of an appropriate scale, however considers that the provisions which flow on from this policy do not reflect what is appropriate in all parts of the coastal environment. In addition, the policy does not recognise that there are existing subdivisions within the coastal environment where only some lots have been developed and some remain to be developed.	Include as additional text: a. Are existing lawfully established structures or sites;
Russell and Joanne Smith (S477)	S477.012	Coastal Environment	CE - P6	Support	The submitter supports the provision for buildings and structures within the coastal environment, of an appropriate scale, however considers	Retain as notified

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					that the provisions which flow on from this policy do not reflect what is appropriate in all parts of the coastal environment.	
Russell and Joanne Smith (S477)	S477.013	Coastal Environment	CE - P7	Support	The submitter supports this provision, which allows for development in areas already modified and expansion of existing settlements, however is concerned that the provisions which flow on from this policy are inappropriate.	Retain as notified
Russell and Joanne Smith (S477)	S477.014	Coastal Environment	CE - R4	Oppose	The coastal environment covers vast areas of the West Coast Region. The proposed restrictions on building in the Coastal Environment are unduly restrictive and do not provide for residential or rural activities which are anticipated by the zones. Many established buildings are already 200m2 and the rule would trigger a resource consent for almost every dwelling, The floor heights and floor area are unduly restrictive.	Remove gross ground floor area size limit for buildings in the RLZ zone by deleting CE - R4.2.iii.1. Alternatively replace with a more appropriate ground floor area limit which provides for reasonably sized residential dwellings within the coastal environment in line with the operative District Plans.,
Russell and Joanne Smith (S477)	S477.015	Coastal Environment	CE - R8	Oppose	The maximum height limit above 5m for buildings and structures does not reflect the topography of the land or for sites which are already identified as a rural residential subdivision. The limit is unduly prohibitive.	Remove height limit or alternatively set more appropriate height limit where subdivision is in place.
Russell and Joanne Smith (S477)	S477.016	Natural Features and Landscapes	NFL - R11	Oppose	Earthworks are not enabled in an area that has been approved for subdivision and which has a number of dwellings which are established.	Include access and building platforms as a permitted activity.
Russell and Joanne Smith (S477)	S477.017	Coastal Environment	CE - R16	Oppose	Matters of discretion are unduly restrictive for an identified and established subdivision. The matters of discretion (other than those which relate to landscape and amenity value) do not relate to ONL status.	Remove all matters of discretion where existing subdivisions are in place except those which relate to landscape and amenity values

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Russell and Joanne Smith (S477)	S477.018	Coastal Environment	CE - R16	Oppose	Matters of discretion are unduly restrictive for an identified and established subdivision. The matters of discretion (other than those which relate to landscape and amenity value) do not relate to ONL status.	Remove all matters of discretion where existing subdivisions are in place except those which relate to landscape and amenity values
Russell and Joanne Smith (S477)	S477.019	Earthworks	EW - R1	Support	This rule is a duplication of regional council rules and the 1.5m cut height is unduly restrictive, particularly in existing subdivisions with existing dwellings,.	Remove 1.5m cut height or alternatively provide a more generous cut height which enables residential development as intended in existing subdivisions.
Russell and Joanne Smith (S477)	S477.020	Earthworks	EW - R3	Oppose	500m2 is insufficient for building platform and access on land which has been identified for subdivision and where existing residential dwellings in the subdivision is well established.	Remove 500m2 limit on earthworks in the RLZ . Alternatively, provide a more generous earthworks limit such as 2000m2
Russell and Joanne Smith (S477)	S477.021	Subdivision	SUB - S1	Oppose	4ha is too large for a bush block where it is possible to have a sense of spaciousness and rural character and where privacy can be gained without adverse effects to neighbours seeking a rural lifestyle.	Remove the minimum 4ha and replace with something more practical for today's lifestyle housing requirements eg 5000m2 or 1ha
Russell and Joanne Smith (S477)	S477.022	General Rural Zone	GRUZ - R3	Oppose	4ha is too large for residential density in a bush block where it is possible to have a sense of spaciousness and rural character and where privacy can be gained without adverse effects to neighbours seeking a rural lifestyle.	Remove the minimum 4ha and replace with something more practical for today's lifestyle housing requirements eg 5000m2 or 1ha
Russell and Joanne Smith (S477)	S477.023	Planning Maps and Overlays	Planning Maps and Overlays	Amend	<ul style="list-style-type: none"> <li>a. there are existing controls in place in relation to the section which enable development of the section in a manner that is harmonious with the surroundings;</li> <li>b. the highly modified nature of the pockets of land to the south at Point Elizabeth Heights and to the north with other subdivisions</li> <li>c. The land will be zoned as rural lifestyle zone under the TTPP and the</li> </ul>	Pull the overlays back to the boundary of the Point Elizabeth Heights subdivision at Cobden to where it abuts the Rapahoe Scenic Range Reserve.

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					controls in place in the overlays are inappropriate; d. the West Coast Regional Land and Water Plan places restrictions on the clearance of vegetation on this property as it sits within the Greymouth Earthworks control area. Additional controls are considered an unnecessary duplication.	
Russell Copland (S248)	S248.001	SCHED 3: SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	Oppose	<p>My property is subject to Victorian Title and I have a letter from Doug Kidd then Minister of Energy Resources saying that all pounamu on the land is mine that neither Ngai Tahu nor local Iwi would need to be notified he adds that this situation would not change due to the legislation of the Pounamu Vesting Act or the Treaty Settlement to Ngai Tahu. I invested in these minerals with a clear understanding of having legal ownership of minerals including Pounamu on my Milltown property and in the knowledge of neither Ngai Tahu or local Iwi having no need to be notified and the legal position has not changed.</p> <p>It was the Crown owned minerals only which were able to be legally Vested in the Vesting Act legislation as is pointed out in Doug Kidd's letter. In more recent years local Iwi decided that they no longer had interest in that Title of land and sold it willingly at market value. Further more when Pat Cowie who I purchased the property from, decided to sell it, Ngai Tahu were approached and had no interest in buying it. Mawhera Incorporation were also</p>	Remove the SASM identification over the property at Milltown and restrictions around Pounamu that relate to it.

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					offered the opportunity to purchase the property and showed no interest either.	
Russell Lane (S286)	S286.001	Planning Maps and Overlays	Sites and Ares of Significance to Māori	Oppose	<p>Carmichael Estates Ltd Orowaiti Rd plots 40, 40A, 40B, 40C, 42 &amp; 42A  The reasons we believe we should not have the provisions of SASM - 14 encumbrance on our land are as follows;</p> <p>1 This land was originally Maori Leasehold Land that we had been leasing leading up to us purchasing it.  2 We purchased this land direct from the Ngāi Tahu via the local Mawhera Incorporation.  3 When the land was purchased from the Mawhera Incorporation there was no request for access or caveats required. Clear title was issued.  4 When we subdivided the land all requirements were covered in the Resource Consent and the titles were issued. As part of the consent all parties were approached. There were no caveats requested by the Iwi.  5 We don't believe the SASM - P14 should apply to these properties as we have a full resource consent to subdivide this land and build houses.  6 In compliance with our resource consent we retain the right to build houses as per your statement of existing use rights.  7 This land has been levelled and filled with no evidence of archeological sites or signs of habitation.  8 You have not provided substantiated evidence of Māori occupation. Therefore the the Māori Reserve classification of these sites</p>	That the SASM 14 be deleted from the property at Orowaiti Road.

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					should be removed.	
Russell Robinson (S515)	S515.001	Planning Maps and Overlays	Rezoning Requests	Amend	The proposed rezoning is more appropriate than the existing rezoning and would allow expansion of urban development adjoining existing urban township of Moana. Applying a form of Settlement zoning to the site would provide for more efficient use of land while still managing the natural resource values on the site such as maintaining indigenous biodiversity values, and protecting any identified areas which qualify as significant indigenous vegetation under the Regional Policy Statement and notified TPPP framework	Amend the notified TPPP Maps to rezone the Lot 1 DP2820 (14.0027ha) and Pt RS 3806 (12.7168ha) at Moana. from Settlement Zone with a Rural Residential Precinct as identified in the map in the submission to an urban zoning comprising a mix of residential and commercial development such as a Settlement Zone (with average and minimum allotment sizes), a village commercial centre precinct and a light industrial zone.
Russell Robinson (S515)	S515.002	Planning Maps and Overlays	Natural Features and Landscapes	Amend	This will more accurately reflect the forest vegetation cover associated with the reserve and Arnold River environment located to the west of the site,	Amending the location of the Outstanding Natural Landscape Boundary identified on the notified TPPP, to more accurately reflect the forest vegetation cover associated with the reserve and Arnold River environment located to the west of the site, (including consequential amendments to the adjoining sites to better reflect the amended boundary). A proposed amended Outstanding Natural Landscape boundary is included in a map in the submission.
Ruth Henschel (S150)	S150.001	Natural Hazards	Natural Hazards Policies	Oppose in part	The degree of risk management proposed is extreme - there is a lack of inclusion of likely future planning changes due to ongoing scientific assessment of risk also due to climate change; and central government action; the lack of specificity in identification of risk/s across individual property titles; and how it affects the property and ourselves as occupiers and kaitiaki of the property. Natural hazard policies	<b>Amend the Natural hazard policies</b> and risk management approach in relation to <b>Flood hazard susceptibility and Coastal hazard alert hazards so they are less risk averse.</b>

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					<p>which we believe affect the property disproportionately by being poorly quantified and too extreme towards risk averse are: Flood hazard susceptibility and Coastal hazard alert.</p> <p>We don't find the process of identifying for Flood hazard susceptibility and Coastal hazard alert being robust but rather, a 'worst case scenario' to mitigate risks. This impacts the usability, insurability, and value of the property as well as the well-being of the owner of the property. The risk management proposed is also too extreme for a time scale that reflects only current knowledge of climate change and its mitigation.</p>	
Ruth Henschel (S150)	S150.002	Planning Maps and Overlays	Rezoning Requests	Amend	The size of the property, and the user intent ongoing and at time of purchase is in line with Rural Lifestyle.	Rezone the property 4456B Karamea Highway from General Rural zone to Rural Lifestyle.
Ruth Henschel (S150)	S150.003	Planning Maps and Overlays	Rezoning Requests	Oppose in part	There is no record of it being used for horticulture or anything other than grazing livestock before being subdivided for lifestyle rural use. Being such a small property, grazing livestock is not a viable use of the land.	<b>Remove the highly productive land precinct at 4456B Karamea Highway and rezone Rural Lifestyle.</b>
Ruth Henschel (S150)	S150.004	Planning Maps and Overlays	High Natural Character	Oppose	It is clear that this identification is a result of a section of the property having been previously erroneously designated as Schedule 2 wetland.	Remove the 'High Coastal Natural Character overlay from 4456B Karamea Highway.
Ruth Henschel (S150)	S150.005	Planning Maps and Overlays	Natural Hazards	Oppose in part	We don't agree with the arbitrary and generalised mapping of these across the property. Without a proper survey or expert inspection, the property has been identified in its entirety, as being susceptible to coastal inundation. This has been done despite no historical	<b>Remove Flood hazard susceptibility and the Coastal hazard alert overlays removed from 4456B Karamea Highway or returned to the previously identified area adjacent to the highway.</b>



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					evidence, as well as, during our 12 year ownership, never having been affected by coastal inundation or flooding across the most part of the land. We don't find the process of identifying for Flood hazard susceptibility and Coastal hazard alert being robust but rather, a 'worst case scenario' to mitigate risks. This impacts the usability, insurability, value of the property as well as the well-being of the owner of the property.	
Ruth Henschel (S150)	S150.006	Natural Hazards	Natural Hazards	Oppose in part	In general we agree that there is a need for Te Tai o Poutini Plan but disagree on: the extreme level of risk management proposed; the lack of inclusion of likely future planning changes due to ongoing scientific assessment of risk also due to climate change; and central government action; the lack of specificity in identification of risk/s from across individual property titles; and how it affects the property and ourselves as occupiers and kaitiaki of the property 4456B Karamea Highway Karamea.	Amend the plan so that it takes a less extreme approach to risk management and takes into account likely future planning changes and provides more specific analysis based on risks to individual property titles.
Samantha Pooley (S291)	S291.001	Planning Maps and Overlays	Sites and Areas of Significance to Māori	Oppose	I am opposed the SASM 101 on our free hold property being part of this plan as I am concerned with the long term ramifications of this. For example how it will impact on any future sale of this property, what both myself and my families rights will be to a property we have bought and cared about for 25years. This property was a lease hold property 40 years ago but Mawhera allowed it to go to private sale. Mawhera has kept an interest in an 8	Remove SASM 101 as relates to the property at 326 Arthurstown Road

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					metre strip between ourselves and the neighbours which goes from the Hokitika river to the paper road. We do not believe that our property in any way impedes on interests of this Maori site and we do not believe as this is a mined area that there is anything of interest to Maori under the ground.	
Sander De Vries (S58)	S58.001	Planning Maps and Overlays	Coastal Environment	Oppose	<p>We want to have a revaluation of the proposed natural significance on our land. We oppose the decision of the council regarding the classification of a part of our land as Natural significance and environmental values for the following reasons:</p> <ul style="list-style-type: none"> <li>- This part of the land includes Eucalyptus trees (which we use for our fire wood) and gorse bushes; emphasis is on the gorse as that demonstrates good drainage.</li> <li>- This part of the land contains one of our main drains (between us and our neighbour) which need to be maintained every year by machinery to avoid flooding of our property.</li> <li>- This part of the land does not contain any natural significance</li> </ul>	We want to have a revaluation regarding the Natural significance (High Natural Character) of our land - 4456A Karemea Highway, Karamea. We want to have the area that contains Eucalyptus trees removed from the High Natural Character Overlay.
Sarah Bushby (S9)	S9.001	Subdivision	SUB - S1	Amend	I am having a small subdivision underway down Marsden Road to allow me to build next to my mum. It is going slower than expected due to the workload of the surveyor slowing down our submission (7 months on and still not done groundwork..). Changing the minimum subdivision size would mean that we couldn't divide up our family land as planned. The 1HA is still plenty	I would like the minimum subdivision size for the General Rural Zone to remain at 1HA rather than increase to 20HA

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					of room for house/lifestyle, but 20HA is too much.	
Scenic Hotel Group (S483)	S483.001	Whole Plan	Whole plan	Not Stated	There is a large amount of information to understand and absorb. There is a need for deeper engagement with ratepayers, businesses and residents. There needs to be funding provided to assist groups understanding the plan.	Withdraw provisions which affect existing property rights and use of rights.
Scenic Hotel Group (S483)	S483.002	Planning Maps and Overlays	Rezoning Requests	Oppose	Concerned will limit future development such as hotel extensions, conference centres. Could impact valuations, raise owners costs.	Oppose Scenic Visitor Zoning for the following properties: <ul style="list-style-type: none"> <li>Te Waionui Forest Retreat 3 Wallace St Franz Josef Glacier</li> <li>Scenic Hotel Franz Josef Glacier 45 SH6 Franz Josef Glacier</li> <li>Kea Staff Village 93 Cron Street, Franz Josef Glacier</li> <li>Heartland Hotel Glacier Country, 11 Cook Flat Road, Fox Glacier</li> <li>Ocean View Resort, 4327 State Highway 6, Punakaiki</li> <li>27-31 Sullivan Road Fox Glacier</li> </ul> Seek compensation for any restrictions from rezoning.
Scenic Hotel Group (S483)	S483.003	Planning Maps and Overlays	Rezoning Requests	Oppose	Concerned will limit future development such as hotel extensions, conference centres. Could impact valuations, raise owners costs.	Oppose Settlement Zone Coastal Settlement Precinct Zoning on the following properties: <ul style="list-style-type: none"> <li>Sec 21 Mabel Street, Punakaiki</li> <li>Sec 23 Mabel Street, Punakaiki</li> <li>Sec 24 Mabel Street, Punakaiki</li> <li>Sec 25 Mabel Street, Punakaiki</li> <li>Punakaiki Beachfront Motels, Mabel Street, Punakaiki</li> <li>Punakaiki Rocks, Hotel and Bar, Owen St, Punakaiki</li> </ul>

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						Seek compensation for any restrictions arising from rezoning
Scenic Hotel Group (S483)	S483.004	Planning Maps and Overlays	Rezoning Requests	Oppose	Concerned will limit future development such as hotel extensions, conference centres. Could impact valuations, raise owners costs.	Oppose Settlement Zone zoning on the following properties: <ul style="list-style-type: none"> <li>• 31 Pekanga Drive, Fox Glacier</li> <li>• 35 Pekanga Drive, Fox Glacier</li> <li>• 24 Cowan Street, Franz Josef Glacier</li> <li>• 26 Cron Street, Franz Josef Glacier</li> <li>• 2 Condon Street, Franz Josef Glacier</li> </ul> Seek compensation for any restrictions arising from rezoning.
Scenic Hotel Group (S483)	S483.005	Planning Maps and Overlays	Rezoning Requests	Oppose	Oppose any rezoning from Tourist Commercial Zone to General Rural Zone	No rezoning of properties from Tourist Commercial to General Rural Zone (Franz Josef).
Scenic Hotel Group (S483)	S483.006	Rural Zones	Rural Zones	Support		Retain the approach of treating Air BnB as a commercial land use
Scenic Hotel Group (S483)	S483.007	Residential Zones	Residential Zones	Support		Retain the approach of treating Air BnB as a Commercial land use.
Scenic Hotel Group (S483)	S483.008	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori	Oppose	Cannot allow sites and areas of significance to Māori to restrict or delay future developments or enhancements of private businesses as this could render private land to be a liability and essentially worthless. The process establishing the management of SASM is unclear.	Withdraw SASM where they restrict businesses and private developments.
Scenic Hotel Group (S483)	S483.009	Whole Plan	Whole plan	Oppose	The proposed policy and regulation do not allow people to quickly protect property and land without breaking the law. It also does not allow people to	Amend the plan so that people can protect property and land where a natural hazard threatens.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					protect property and land where a gradual threat occurs.	
Scenic Hotel Group (S483)	S483.010	Planning Maps and Overlays	Natural Hazards	Oppose	Concerned will limit future development such as hotel extensions, conference centres. Could impact valuations, raise owners costs.	Oppose Flood Plain Hazard on the following properties: <ul style="list-style-type: none"> <li>• 31 Pekanga Drive, Fox Glacier</li> <li>• 27-31 Sullivan Road, Fox Glacier</li> <li>• Heartland Hotel Haast, Jackson Bay Road, Haast</li> <li>• Heartland Hotel Glacier Country, 11 Cook Flat Road, Fox Glacier</li> <li>• 35 Pekanga Drive, Fox Glacier</li> <li>• Sec 21 Mabel Street, Punakaiki</li> <li>• Sec 23 Mabel Street, Punakaiki</li> <li>• Sec 24 Mabel Street, Punakaiki</li> <li>• Sec 25 Mabel Street, Punakaiki</li> </ul>
Scenic Hotel Group (S483)	S483.011	Natural Hazards	Natural Hazards Rules	Oppose	The rules are unnecessary, unduly restrictive and may affect the funding of development as well as the insurability of property.	Remove natural hazards provisions from the plan where they affect existing lawfully established activities.
Scenic Hotel Group (S483)	S483.012	Natural Hazards	Earthquake Hazard Overlays - All	Oppose	Certain types of buildings are able to withstand earthquakes with little or moderate damage and do not represent a threat to life. The plan should permit people to build with these materials and techniques. Preventative work such as earthquake strengthening does not seem to be provided for in this plan.	Replace the rules with rules that permit modern buildings and techniques compliant with building codes and standards that can withstand earthquakes without risk to life or unacceptable damage.
Scenic Hotel Group (S483)	S483.013	Planning Maps and Overlays	Natural Hazards	Oppose	Concerned will limit future development such as hotel extensions, conference centres. Could impact valuations, raise owners costs.	Oppose Earthquake Overlays on the following properties: <ul style="list-style-type: none"> <li>• Scenic Hotel Franz Josef Glacier 45 SH6 Franz Josef Glacier 24 Cowan Street, Franz Josef Glacier</li> <li>• 26 Cron Street, Franz Josef Glacier</li> <li>• 2 Condon Street, Franz Josef Glacier</li> </ul>

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Scenic Hotel Group (S483)	S483.014	Planning Maps and Overlays	Natural Hazards	Oppose	Concerned will limit future development such as hotel extensions, conference centres. Could impact valuations, raise owners costs.	Oppose Land Instability overlay on the following properties: <ul style="list-style-type: none"> <li>Punakaiki Beachfront Motels, Mabel Street, Punakaiki</li> <li>Punakaiki Rocks, Hotel and Bar, Owen St, Punakaiki</li> <li>Sec 21 Mabel Street, Punakaiki</li> <li>Sec 23 Mabel Street, Punakaiki</li> <li>Sec 24 Mabel Street, Punakaiki</li> <li>Sec 25 Mabel Street, Punakaiki</li> </ul>
Scenic Hotel Group (S483)	S483.015	Planning Maps and Overlays	Natural Hazards	Oppose	Concerned will limit future development such as hotel extensions, conference centres. Could impact valuations, raise owners costs.	Oppose Flood Hazard Susceptibility Overlay on the following properties: <ul style="list-style-type: none"> <li>24 Cowan Street, Franz Josef Glacier 26 Cron Street, Franz Josef 2 Condon Street, Franz Josef Glacier Te Waionui Forest Retreat 3 Wallace St Franz Josef Glacier Scenic Hotel Franz Josef Glacier 45 SH6 Franz Josef Glacier</li> <li>Kea Staff Village 93 Cron Street, Franz Josef Glacier</li> </ul>
Scenic Hotel Group (S483)	S483.016	Planning Maps and Overlays	Natural Hazards	Oppose	Concerned will limit future development such as hotel extensions, conference centres. Could impact valuations, raise owners costs.	Oppose Coastal Hazard Overlays (Alert and Severe) over the following properties: <ul style="list-style-type: none"> <li>Punakaiki Beachfront Motels, Mabel Street, Punakaiki</li> <li>Punakaiki Rocks, Hotel and Bar, Owen St, Punakaiki</li> <li>Sec 21 Mabel Street, Punakaiki</li> <li>Sec 23 Mabel Street, Punakaiki</li> </ul>

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<ul style="list-style-type: none"> <li>• Sec 24 Mabel Street, Punakaiki</li> <li>• Sec 25 Mabel Street, Punakaiki</li> </ul>
Scenic Hotel Group (S483)	S483.017	Planning Maps and Overlays	Sites and Ares of Significance to Māori	Oppose	Concerned will limit future development such as hotel extensions, conference centres. Could impact valuations, raise owners costs	<p>Oppose SASM 31 at Punakaiki on the following properties:</p> <ul style="list-style-type: none"> <li>• Sec 21 Mabel Street, Punakaiki</li> <li>• Sec 23 Mabel Street, Punakaiki</li> <li>• Sec 24 Mabel Street, Punakaiki</li> <li>• Sec 25 Mabel Street, Punakaiki</li> <li>• Punakaiki Beachfront Motels, Mabel Street, Punakaiki</li> <li>• Punakaiki Rocks, Hotel and Bar, Owen St, Punakaiki</li> <li>• Ocean View Resort, 4327 State Highway 6, Punakaiki</li> </ul>
Scenic Hotel Group (S483)	S483.018	Natural Hazards	Earthquake Hazard Overlays - All	Oppose		Should any of the changes that restrict development be adopted then financial assistance or compensation - in conjunction with central government agencies needs to be investigated as appropriate.
Scenic Hotel Group (S483)	S483.019	Whole Plan	Whole plan	Oppose	We support long term environmental and economic sustainability	Better address long term environmental and economic sustainability within the Plan.
Scoped Planning and Design Limited (S617)	S617.001	Planning Maps and Overlays	Large Lot Residential Zone	Amend	Landowner investigations have demonstrated that the site is suitable for residential development at reduced density	<p>amend plan so that lots listed below are rezoned to large lot residential:</p> <p>- RS 1615, RS 1622, RS 1594, Pt RS 1613 and Lot 2 DP 2816</p>

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Scoped Planning and Design Limited (S617)	S617.002	Future Urban Zone	FUZ - O4	Support	Allow for more than one process in achieving development in the FUZ	Retain
Scoped Planning and Design Limited (S617)	S617.003	Future Urban Zone	FUZ - P4	Support	Provides for the potential to implement necessary infrastructure	Retain
Scoped Planning and Design Limited (S617)	S617.004	Future Urban Zone	FUZ - P5	Support	Provides a pragmatic approach to the implementation of a structure plan	Retain
Scoped Planning and Design Limited (S617)	S617.005	Future Urban Zone	FUZ - R10	Support	Provides for development where a structure has been adopted	Retain
Scoped Planning and Design Limited (S617)	S617.006	Subdivision	SUB - S1	Amend	Does not provide for productive rural land holdings to be subdivided off from existing lawfully established dwellings	Add additional standard: <b>General Rural Zone subdivision must comply with all of the following standards:</b> i. <b>General Rural Zone 4 hectares, except that it is 20 hectares in the Highly Productive Land Precinct;</b> orii. <b>The Record of Title to be subdivided must be at least 8 hectares in area;</b> iii <b>The Record of Title(s) to be subdivided must have an issued date of no later than 31 December 1999;</b> iv. <b>The proposed subdivision must create no more than one additional Record of Title, excluding an access allotment;</b> v. <b>The additional lot must have a proposed area of between 5,000m<sup>2</sup> and 1.6 hectares.</b>
Scoped Planning and Design Limited (S617)	S617.007	General Rural Zone	GRUZ - R6	Amend	All Districts should be able to provide for homestay accommodation	Amend as follows: <b>1. The accomodation is undertaken within:</b> i. <b>A building ancillary to the primary dwelling on site, which is occupied by a permanent resident, or</b> ii. <b>The accomodation is homestay accomodation with a permanent resident living within the dwelling or flat.</b> <del>GRZ - R6(7)</del> shall be deleted



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Scoped Planning and Design Limited (S617)	S617.008	Ecosystems and Indigenous Biodiversity	ECO - R1	Amend	Oppose permitted vegetation clearance standards	Transfer rule ECO-R1(5)(i)(a-b) to a controlled activity status. <b>Add matters of control to include but not limited to:-Adverse effects upon ecological integrity are avoided, remedied or mitigated.-Sedimentary controls and management are planned and implements.-Adverse effects upon amenity are avoided, remedied or mitigated.-Landscape character is maintained.</b>
Scoped Planning and Design Limited (S617)	S617.009	Ecosystems and Indigenous Biodiversity	ECO - R1	Oppose	Will ensure Council can address vegetation clearance on a case-by-case basis	Delete ECO-R1(5)(ii)
Scoped Planning and Design Limited (S617)	S617.010	Planning Maps and Overlays	General Residential Zone	Amend	Zoning on west side of Revell Street allows for increased investment and residential occupation	Amend Medium Density Residential Zone on the 167-241A Revell Street to General Residential Zone
Scoped Planning and Design Limited (S617)	S617.011	Natural Hazards	NHR1	Oppose	NH-R1(1-5) means that landowners will be forced to rebuild in the same spot as opposed to relocated to a more suitable location	Delete rule NH-R1(1-5)
Scoped Planning and Design Limited (S617)	S617.012	Natural Hazards	NHR4	Oppose	Protection works can reshape the natural environment and processes which can compromise natural character and amenity	NH-R4 moved to full discretionary activity status
Scoped Planning and Design Limited (S617)	S617.013	Natural Hazards	NHR7	Amend	Allows for continued investment in areas where natural hazards can impact property and people	Amend to state <b>unoccupied buildings of no more than 50m2</b>
Scoped Planning and Design Limited (S617)	S617.014	Natural Hazards	NHR10	Oppose	Rule is too permissive	Move NH-R10 to controlled activity status
Scoped Planning and Design Limited (S617)	S617.015	Natural Hazards	NHR10	Amend	Rule is too permissive	Amend to read:Any new buildings or additions and alteration have a finished floor level a <b>minimum</b> of 500mm above the 1%AEP flood event

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Scoped Planning and Design Limited (S617)	S617.016	Natural Hazards	NHR38	Oppose	New investment and reconstruction should be discouraged	delete
Scoped Planning and Design Limited (S617)	S617.017	Natural Hazards	NHR39	Amend	New investment and reconstruction should be discouraged	Amend to state unoccupied buildings of <b>no more than 50m2</b>
Scoped Planning and Design Limited (S617)	S617.018	Natural Hazards	Natural Hazards Rules	Amend	There are no controls for areas at risk of tsunamis or areas affected by coastal erosion vulnerable to storm surge	New sensitive activities are prohibited within the Coastal Severe Overlay
Scoped Planning and Design Limited (S617)	S617.019	Natural Hazards	All Natural Hazard Overlays	Amend	Landslide risk to Franz Josef Town has not been adequately included	Include an additional overlay and associated maps for landslide risk to Franz Josef Township
Scoped Planning and Design Limited (S617)	S617.020	Natural Hazards	Natural Hazards	Amend	Landslide risk to Franz Josef Town has not been adequately included in plan	Rule framework to prohibit all development in landslide risk area to Franz Josef Township
Scott Freeman (S383)	S383.001	Noise	NOISE - R6	Oppose	Rural-lifestyle properties are small discrete areas which are generally entirely and regularly used by the properties occupants. They have more in common with residential and settlement zoned properties than rural zoned properties and so should also be protected in their entirety from excessive noise from adjacent activities.	Noise in the rural-lifestyle zone should be measured at any point within the site (as per residential and settlement zones) rather than at the notional boundary. The rural-lifestyle zone should be included in Noise-R 5.
Scott Freeman (S383)	S383.002	Noise	NOISE - R5	Amend	Rural-lifestyle properties are small discrete areas which are generally entirely and regularly used by the properties occupants. They have more in common with residential and settlement zoned properties than rural zoned properties and so should also be protected in their entirety from excessive noise from adjacent activities.	The rural-lifestyle zone should be included in Noise-R 5.
Scott Freeman (S383)	S383.003	Planning Maps and Overlays	Rezoning Requests	Oppose	Our property lies at 141 Alma Road, Westport (refer map in submission) (Lot 2 DP362094 Blk IV Steeples SD). It is	Re 141 Alma Road(Lot 2 DP362094 Blk IV Steeples SD) rural property zoning. We would like the zoning of our property to be either:

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					<p>less than 4 ha in area and has been used for residential purposes for over 20 years. It is not farmed. The properties with dwellings around the existing quarry existed prior to the quarry being legally established. The logic of changing the zoning of one nearby property (ours) to rural and not other properties is unclear and is inconsistent:</p> <p>Ultimately the quarry operation is not compatible with the proposed future residential use of the Alma Road area. We do not agree with inconsistently zoning land around it to potentially allow for the quarry's further expansion, while at the same constraining surrounding land from future residential use for Westport township retreat.</p>	zoned residential to reflect the proposed future use of Alma Road and as originally proposed in the draft TTPP, or zoned as rural-lifestyle to reflect its actual present use and size.
SEAN CASEY (S416)	S416.002	SCHED 3: SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 12	Amend	Mapping error that has not been fixed during the correction process.	Removal of SASM12 from the property on section 115 Romilly St Westport
Shannon Carlson (S19)	S19.001	Planning Maps and Overlays	Rezoning Requests	Amend	<p>I suggest that we make it easier for those living on the terraced areas above Westport to subdivide smaller lots to enable more long term housing options for the people of Westport. Flood protection may work for a time however we need to be considering our children's children etc..</p> <p>Rules around setbacks, planting etc could be added to protect the rural feel of the area</p>	Rezone the area on the east side of Buller Rd from the Buller Bridge to the cross roads as SETZ-R1 (rural residential) so as small life style properties of 1000m2 can be created 1 one dwelling and 1 minor dwelling less than 65m2 using onsite sewer and stormwater.
Sharon Langridge (S388)	S388.001	Planning Maps and Overlays	Rezoning Requests	Amend	Resource consent for Mineral extraction was declined on the above property in 2022. This proposed zone is located in amongst housing,	Delete - Barrytown Flats Mineral Zone on the Property Lot 1 DP412689 Rural Section 2847 Section 5 Block 5. This should be changed to

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					businesses & farms in a quiet coastal setting famed for its environmental beauty -not an industrial hub. Its not an appropriate location for this zone.If the Minz get approved for the plan its likely to stay in the plan for the next 15-25 yrs which is going to potentially devalue all the surrounding properties for up to a quarter of a century! This will turn over the rights of the residents/farming/tourism businesses in favour of the mining industry in terms of noise emissions, traffic & environmental concerns. Consideration needs to be given to reverse sensitivity. Currently there is no large scale mining/industrial activity in Barrytown, any changes to this will no doubt change the area and impact on residents etc and should require consenting and public notification.	General Rural Zone.
Sharon Langridge (S388)	S388.002	General Rural Zone	GRUZ - R12	Oppose	Doesn't consider the cumulative effects of multiple mines in one location eg Barrytown flats. Allowing 3ha at a time to be mined without consents is not appropriate. Mining is one of the most destructive/noisy industries generally motivated by money not environmental protection. It therefore should come under more scrutiny not less, and the communities/neighbours/businesses that will be effected by such activities should be consulted.	Remove GRUZ -R12 - Mineral extraction should be a Restricted Discretionary or Discretionary activity in Rural Zones.
Sharon Langridge (S388)	S388.003	General Rural Zone	GRUZ - R18	Oppose	Mineral extraction in General Rural should be Restricted Discretionary or Discretionary. There is no Schedule 10.	Remove GRUZ R18
Sharon Langridge (S388)	S388.004	General Rural Zone	GRUZ - R25	Amend	If multiple mining operations were working in a localised area as such as Barrytown please consider the cumulative	Rule needs to consider cumulative effects of mining in same locality - the notional boundary in relation to noise/dust should be changed to

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					effects in regards to wildlife, water, transport, processing plant activities ,noise, dust. etc Please also change the notional boundary of properties to the actual property boundary - especially in relation to noise/dust.	the actual property boundary
Sharon Langridge (S388)	S388.005	Noise	NOISE - R11	Amend	Neighbouring properties notional boundary should not be used as a buffer for noise control. The boundary for noise should be the actual property boundary. Properties that are creating large noise volume need to manage the noise within their own boundaries, eg industrial activities. Especially in areas where there are farms/housing. It is not acceptable for example for farm animals having to endure continual noise disturbance between the farm house and the source of the noise on a neighbouring property, especially during calving/lambing.	Amend notional property boundary to actual property boundary.
Sharon Langridge (S388)	S388.006	Noise	NOISE - R6	Amend	Farming activities have intermittent noise which is acceptable and vastly different to proposed activities such as mineral extraction in rural areas which is an industrial activity which maybe continuous.	Amend 55db is too permissive, amend to 50 more appropriate. Change notional boundary to property boundary.
Sharon Langridge (S388)	S388.007	Noise	NOISE - R8	Amend	Amend notional boundary to property boundary. Especially in areas where housing is already present.	Amend notional boundary to property boundary.
Shaun and Carissa du Plessis (S402)	S402.001	Whole Plan	Whole plan	Amend	General readability of the plan needs to be addressed. The plan should be simplified to ensure a user-friendly experience for everyone. Some of the rules are unnecessarily complex, the headings are long and in many instances, to understand the rules a constant reference to the definitions is	Review and simplify the provisions to ensure that the plan can be used and easily interpreted by all. Reduce repetition. Fix grammar and formatting issues. Address usability issues of the e-plan maps.

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					<p>required. An example of the need to refer to definitions is in the natural hazard section and the constant need to refer to the definition of Additions and Alterations to understand the rules. This makes the rules unnecessarily complicated and hard to use. In terms of the maps, the plan user needs to be able to search using common criteria such as an address, legal description, a valuation number and record of title reference. The e-plan maps are not as user-friendly as they could be. Some searches for property addresses result in unknown address when it's a known address. The number of overlays within the plan are over-whelming and it is requested that a more simplified approach is taken</p> <p>There is a lot of repetition within the rules, some rules could be condensed where they are similar and essentially seeking to achieve the same outcome.</p>	
Shaun and Carissa du Plessis (S402)	S402.002	Natural Hazards	Natural Hazards	Support	To ensure natural hazard overlays are justified. The overlays are extensive in many areas. A review of all natural hazard overlays is needed. The overlays should be supported with evidence to justify their extent. All overlays should be supported with a relevant technical report that has been prepared by a suitably qualified person.	Review the number and extent of natural hazard overlays ensuring all are justified and supported with a relevant technical report that has been prepared by a suitably qualified person.
Shaun and Carissa du Plessis (S402)	S402.003	Planning Maps and Overlays	Natural Hazards	Amend	To ensure natural hazard overlays are justified. The overlays are extensive in many areas. A review of all natural hazard overlays is needed. The overlays should be supported with evidence to justify their extent	Review all natural hazard overlay extents to ensure all are supported by evidence to justify their extents.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Shirley Godfrey (S390)	S390.001	Planning Maps and Overlays	Rezoning Requests	Oppose	The Company of the Koiterangi Lime Company Ltd operates a limestone quarry at Camelback Road Kowhitirangi. Mining permit no 41 325. The Legal description of this existing quarry is Lots 1 2 DP 315 SECS 2 3 SO11712 BLK I TOAROHA S D - Includes Minerals. Valuation Number 25760-54800. I oppose that these parcels of land have been zoned GRUZ and request that the zoning be changed to have these included into the Mineral Extraction Zone.	Include the Koiterangi Limestone Quarry at Camelback Road Kowhitirangi Lots 1 2 DP 315 SECS 2 3 SO11712 BLK I TOAROHA S D in the Mineral Extraction Zone.
Shirley Godfrey (S390)	S390.002	Schedule Nine: Lawfully Established Mineral Extraction and Processing Areas	SCHED9 - LAWFULLY ESTABLISHED MINERAL EXTRACTION AND PROCESSING AREAS	Amend	The Company of the Koiterangi Lime Company Ltd operates a limestone quarry at Camelback Road Kowhitirangi. Mining permit no 41 325. The Legal description of this existing quarry is Lots 1 2 DP 315 SECS 2 3 SO11712 BLK I TOAROHA S D - Includes Minerals.	Include the Limestone quarry of the Koiterangi Lime Co Ltd be included in Schedule Nine: Lawfully Established Minerals Extraction and processing Areas.
Shirley Godfrey (S390)	S390.003	Planning Maps and Overlays	Natural Features and Landscapes	Support in part	The Company of the Koiterangi Lime Company Ltd operates a limestone quarry at Camelback Road Kowhitirangi. Mining permit no 41 325. The Legal description of this existing quarry is Lots 1 2 DP 315 SECS 2 3 SO11712 BLK I TOAROHA S D - Includes Minerals. I support the parcels of land of the Koiterangi Lime Company Ltd not being included in Schedule Five: Outstanding Natural Landscapes.	Continue to not include the Koiterangi Lime company quarry at Lots 1 2 DP 315 SECS 2 3 SO11712 BLK I TOAROHA S Din any Outstanding Natural Landscape.
Shirley Godfrey (S406)	S406.001	Planning Maps and Overlays	Rezoning Requests	Neutral	A large percentage of the neighbouring land in the area is already zoned Rural Residential as shown on the attached information. (Refer original submission for maps)	I request that the following two parcels of land at State Highway 6 Taramakau be Re-zoned to Rural Residential. Valuation number 25730-51700. PT RS 1999 BLK VII WAIMEA SD. Area 11.9559 Ha, Valuation number 25730-51702. Sec 11 SO557707. Area 1.2126 Ha.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Silver Fern Farms Limited by its authorised agents Mitchell Daysh Limited (S441)	S441.001	General Industrial Zone	Overview	Support	It is appropriate, for the sake of consistency, for the description of the General Industrial Zone to correspond to the zone description as specified in the National Planning Standards 2019.	Retain as notified.
Silver Fern Farms Limited by its authorised agents Mitchell Daysh Limited (S441)	S441.002	Interpretation	Definitions	Oppose	The reference to "hazardous or explosive material storage" requires qualification as to scale, to ensure that this definition is not all-encompassing and unduly restrictive of activities with respect to the rules of the Natural Hazards chapter of the Proposed Plan. Silver Fern Farms notes that this term is not already defined in the National Planning Standards 2019 or in the Resource Management Act 1991.	Amend.
Silver Fern Farms Limited by its authorised agents Mitchell Daysh Limited (S441)	S441.003	Interpretation	INDUSTRIAL ACTIVITY	Support	It is appropriate, for the sake of consistency, for this definition to correspond to the definition of this activity as specified in the National Planning Standards 2019.	Retain as notified.
Silver Fern Farms Limited by its authorised agents Mitchell Daysh Limited (S441)	S441.004	Interpretation	OPERATIONAL NEED	Support	It is appropriate, for the sake of consistency, for this definition to correspond to the definition of this activity as specified in the National Planning Standards 2019.	Retain as notified
Silver Fern Farms Limited by its authorised agents Mitchell Daysh Limited (S441)	S441.005	Interpretation	REVERSE SENSITIVITY	Amend	It is appropriate to recognise the potential negative effects for approved, existing or permitted activity's which may be generated through reverse sensitivity. Silver Fern Farms consider that the phrase "more recent establishment or alteration of another activity" implies that reverse sensitivity is not relevant until such time as the new sensitive activity is physically established and the	Amend the definition as follows: Reverse Sensitivity means the potential for an approved, existing or permitted activity to be compromised, constrained, <b>or curtailed by the possible</b> establishment or alteration of another activity which may be sensitive to the actual, potential or perceived adverse environmental effects generated by an approved, existing or permitted activity.



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					reverse sensitivity effects are in place. This definition should enable the risk of reverse sensitivity effects arising in the first place to be managed. Therefore, the definition should be amended.	
Silver Fern Farms Limited by its authorised agents Mitchell Daysh Limited (S441)	S441.006	Interpretation	NOISE	Amend		Silver Fern Farms requests that a definition be included for a noise sensitivity activity, because this term is referred to in the definition of 'Notional Boundary' and is referred to throughout the Plan.
Silver Fern Farms Limited by its authorised agents Mitchell Daysh Limited (S441)	S441.007	Interpretation	Definitions	Amend		Silver Fern Farms requests that a definition be included for a major hazard facility, as this term is referred to in the TTPP (see Rule HS - P4).
Silver Fern Farms Limited by its authorised agents Mitchell Daysh Limited (S441)	S441.008	STRATEGIC DIRECTION	AG - O2	Support	Silver Fern Farms support this objective, noting that it is appropriate to recognise, and provide for support industries and services, that enable agriculture in the West Coast to thrive.	Retain as notified.
Silver Fern Farms Limited by its authorised agents Mitchell Daysh Limited (S441)	S441.009	STRATEGIC DIRECTION	NENV- O1	Oppose	Part 2 of the RMA 1991 has regard to the protection of outstanding natural features and landscapes from inappropriate subdivision, use, and development. The RMA does not, however, require the all-encompassing protection of the items referenced in NENV-01, irrespective of their significance. It is the view of Silver Fern Farms that that this objective is overly broad and, if implemented, would likely entail reduced efficacy for sustainable development in the region.	Silver Fern Farms suggests amending the objective to provide specific details on areas which are to be 'recognised and protected' so as to align with the objectives set out in Part 2 of the RMA.
Silver Fern Farms Limited by its authorised agents	S441.010	STRATEGIC DIRECTION	UFD - O1	Oppose	Silver Fern Farms considers that UFD - 01.3 should recognise the significant contributions that business and industry bring the region in line with UFD - 01.1.	Amend as follows: Support the economic viability and function of town centres <b>and business and industrial land</b> ;

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Mitchell Daysh Limited (S441)					Silver Fern Farms consider that sub-clause 4 should be less restrictive in terms of locations for new developments and recognise that in some instances operational need and/or functional needs will require a particular location. Finally, Silver Fern Farms consider that the urban form and development objective should highlight the priority for avoiding the alignment of conflicting land use zones, which in turn, will contribute to obtaining the District Plan urban form and development objectives.	Recognise the risk of natural hazards whereby new development is located in less hazardous locations <b>unless operational and/or functional needs require a particular location</b> ; Silver Fern Farms also recommend including sub-clause (11) to recognise the fundamental planning principle of separating incompatible land uses to avoid conflict, as follows: UFD -01 To have urban environments and built form on the West Coast/Te Tai o Poutini that: [...] <b>11. Avoids or manages potential conflict (including reverse sensitivity effects) between incompatible activities and zones.</b>
Silver Fern Farms Limited by its authorised agents Mitchell Daysh Limited (S441)	S441.011	Contaminated Land	CL - O1	Support in part	Silver Fern Farms supports the broad direction of this objective but considers that when managing adverse effects on the environment from contaminated land this objective should also allow for "remedies" to avoid potentially be overly restrictive for land uses within industrial areas. Silver Fern Farms recommends amending this to remove unintentional constraints for development within the GIZ.	Amend as follows: To ensure that contaminated land is used, subdivided, developed or managed in a way that avoids, <b>remedies or</b> mitigates adverse effects on the environment and manages the risk to human health to a level that is appropriate for the intended use.
Silver Fern Farms Limited by its authorised agents Mitchell Daysh Limited (S441)	S441.012	Hazardous Substances	Hazardous Substances	Support	Silver Fern Farms supports the approach taken in the Draft Plan to avoid duplication of the HSNO Act requirements in the Plan and which acknowledges the primary role of the Hazardous Substances and New Organisms Act in managing the storage, use, transport and disposal of hazardous substances.	Retain as notified
Silver Fern Farms Limited by its authorised agents	S441.013	Hazardous Substances	HS - P3	Support in part	Silver Fern Farm supports the policy to provide for the establishment and expansions of major hazard facilities	Amend as follows: Provide for the establishment and expansion of major hazard facilities within the Industrial,

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Mitchell Daysh Limited (S441)					within the Industrial Zones where adequate distances are maintained from sensitive activities and valued natural, cultural and historic heritage features. However, Silver Fern Farms requests that this should be amended to reflect existing sensitive activities so as to not unduly restrict the activities within the industrial zone through reverse sensitivity effects.	Port and General Rural Zones, where adequate separation distances are maintained from existing sensitive activities and valued natural, cultural and historic heritage features.
Silver Fern Farms Limited by its authorised agents Mitchell Daysh Limited (S441)	S441.014	Hazardous Substances	HS - P4	Support	Silver Fern Farm supports this policy but notes that policy HS - P4 conflicts with the proposal to rezone the land adjacent to the Silver Fern Farms Plant to GRUZ and GRZ, which will contain sensitive activities. Silver Ferns Farms also notes that this policy should be supported by a definition of a major hazard facilities to assist with interpretation of the policy.	Retain as notified.
Silver Fern Farms Limited by its authorised agents Mitchell Daysh Limited (S441)	S441.015	Natural Hazards	NHP2	Oppose	Silver Fern Farms are of the position that NH - P2 should be less restrictive in terms of locations for developments and recognise that in some instances operational need and/or functional needs will require development in a particular location.	Amend as follows: NH - P2 Where a natural hazard has been identified and the natural hazard risk to people and communities is unquantified but evidence suggests that the risk is potentially significant, apply a precautionary approach to allowing development or use of the area <b>unless operational and/or functional needs require a particular location.</b>
Silver Fern Farms Limited by its authorised agents Mitchell Daysh Limited (S441)	S441.016	Ecosystems and Indigenous Biodiversity	ECO - P2	Support in part	Silver Fern Farm broadly supports this policy but suggest that sub-clause (d) be amended to include reference to "operational need" in addition to "functional need to be located in the area" so as to not overly restrict activities which are already limited to the areas in which they can take place i.e. Industrial areas.	Amend as follows: ECO - P2 Allow activities within areas of significant indigenous vegetation or significant habitats of indigenous fauna where: [...] d. The activity has a functional need <b>or an operational need</b> to be located in the area

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Silver Fern Farms Limited by its authorised agents Mitchell Daysh Limited (S441)	S441.017	Ecosystems and Indigenous Biodiversity	ECO - R1	Support	Silver Fern Farm agrees that the proposed permitted activity performance standards for indigenous vegetation clearance are appropriate.	Retain as notified,
Silver Fern Farms Limited by its authorised agents Mitchell Daysh Limited (S441)	S441.018	Subdivision	SUB - O1	Support in part	Silver Fern Farms supports this objective insofar as it relates to the Site. However, Silver Fern Farm notes that subdivision should achieve patterns of land development that are compatible with purpose, character and qualities of each zone, but notes that subdivision should not lead to unintended reverse sensitivity effects for the industrial zone. For example, where adjacent land to the Site has the proposed rezoning of GRUZ, GRZ, and MRZ, these land uses are markedly different to that of the industrial zone, and by increasing the number of sensitive activities adjacent to the existing Plant, this would likely lead to reverse sensitivity effects.	Amend as follows: SUB - O1 Subdivision achieves patterns of land development that: are compatible with the purpose, character and qualities of each zone. Avoid any reverse sensitivity effects on the operation or expansion of permitted, consented, or existing industrial activities.
Silver Fern Farms Limited by its authorised agents Mitchell Daysh Limited (S441)	S441.019	Subdivision	SUB - O2	Support in part	Silver Fern Farms consider that SUB - O2(e) should also account for the provision of growth and expansion of West Coast/ Te Tai o Poutini industry.	Amend as follows: SUB - O2 Subdivision occurs in locations and at a rate that: [...] e. Provides for growth and expansion of West Coast/Te Tai o Poutini settlements, <b>and</b> businesses <b>and industry</b> ; and [...]
Silver Fern Farms Limited by its authorised agents Mitchell Daysh Limited (S441)	S441.020	Subdivision	SUB - R5	Oppose	If the relief sought by Silver Fern Farms in relation to the zone maps is not granted, Silver Fern Farms would oppose this rule, as it does not recognise the potentially significant land use conflicts that may be caused by residential subdivision (and subsequent development) undertaken within the environs of its site.	SUB - R5 Subdivision to create allotment(s) in all RESZ - Residential Zones, CMUZ - Commercial and Mixed Use Zones, INZ - Industrial Zones, SVZ - Scenic Visitor Zone or PORTZ - Port Zones [entire rule not shown here] This is not within an area of Flood Severe,

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					<p>Silver Fern Farms proposes amendments to require a discretionary consenting pathway and a notification requirement for subdivision in a residential zone that creates new residential lots within 100 m of an industrial zone boundary. This framework will prompt robust assessment of potential reverse sensitivity effects associated with any such subdivision.</p>	<p>Coastal Severe or Westport Hazard Overlay or the Airport Noise Control Overlay; <b>This does not create any lots located within 100 m of the boundary of a General Industrial Zone;</b></p> <p>All Subdivision Standards are complied with; and The subdivision is in general accordance with any development plan in place for the site.</p> <p>Activity status where compliance not achieved: Restricted Discretionary where 3 and 4 is not complied with. Discretionary 2,6, 7, <b>8</b> or <b>98</b> is not complied with. Non-complying where 5 is not complied with.</p>
Silver Fern Farms Limited by its authorised agents Mitchell Daysh Limited (S441)	S441.021	Subdivision	SUB - R6	Amend	<p>Regarding subdivisions and "Matters of control" sub-clause (a), Silver Fern Farms consider that rurally zoned land adjacent to the Site should have controls in place to manage the minimum size of allotments. This viewpoint is consistent with the desire to maintain the character and function of the Zone and to reduce the likelihood of reverse sensitivity effects imposed on the Site. For a controlled activity of this nature, Silver Fern Farms recommends including a specified allotment size (m2) to maintain a consistent approach to subdivisions in these areas.</p> <p>Silver Fern Farms support sub-clause (m) but consider that this sub-clause should also encapsulate activities generated in industrial areas such as "meat processing plants". This would provide sufficient coverage to ensure that potential reverse sensitivity effects</p>	<p>follows: [...] m. Silver Fern Farms recommends that a minimum allotment size is included in sub-clause (a) of "Matters of control". Silver Fern Farms recommends amending sub-clause (m) as</p> <p>Management of potential reverse sensitivity effects on existing land uses, including network utilities, rural activities, industrial activities such as meat processing plants or Major Hazardous Facilities.</p>

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					on existing operations are adequately managed. Further to sub-clause (m), there is reference to "significant hazardous facilities" however this term has not been defined in the Proposed Plan. It is possible this is in reference to Major Hazardous Facilities, however, for the sake of clarity, this should be amended to one term and a definition of the term provided so as to provide simple identification of when this term applies.	
Silver Fern Farms Limited by its authorised agents Mitchell Daysh Limited (S441)	S441.022	Coastal Environment	CE - O3	Amend	Silver Fern Farm broadly supports this policy but suggest that it be amended to include reference to " <b>operational need</b> " in addition to "functional need" so as to not overly restrict activities which are already limited to the areas in which they can take place i.e. Industrial areas. This would also help support Policy CE - P5.	Amend as follows: To provide for activities which have a functional need and/or an operational 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.
Silver Fern Farms Limited by its authorised agents Mitchell Daysh Limited (S441)	S441.023	Coastal Environment	CE - P5	Support	Silver Fern Farms supports this policy insofar as it relates to their activities.	Retain as notified.
Silver Fern Farms Limited by its authorised agents Mitchell Daysh Limited (S441)	S441.024	Coastal Environment	CE - P6	Support	Silver Fern Farms supports this policy insofar as it relates to their activities.	Retain as notified.
Silver Fern Farms Limited by its authorised agents Mitchell Daysh Limited (S441)	S441.025	Coastal Environment	CE - R4	Support	Silver Fern Farms supports this policy insofar as it relates to their activities.	Retain as notified.

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Silver Fern Farms Limited by its authorised agents Mitchell Daysh Limited (S441)	S441.026	Earthworks	EW - O1	Support in part	Silver Fern Farms support the principle for earthworks to facilitate subdivision, use and development of the West Coast Te Tai o Poutini's land resource. However, Silver Fern Farms consider the word "remedied" should be included here.	Silver Fern Farms seeks that the following change is made. Amend as follows: EW - O1 To provide for earthworks to facilitate subdivision, use and development of the West Coast/Te Tai o Poutini's land resource, while ensuring that their adverse effects on the surrounding environment are avoided, <b>remedied</b> , or mitigated.
Silver Fern Farms Limited by its authorised agents Mitchell Daysh Limited (S441)	S441.027	Earthworks	EW - P3	Support in part	Silver Fern Farm support this policy insofar as it relates to their activities; however, they consider that the protocols for accidental discovery should be clear in that operational works can continue at Site, providing that the 20 m exclusion area around the site discovery is not encroached upon. Additionally, there is a minor grammatical typo in this objective which requires amending "... potential risk to earthworks to archaeological sites..."	Amend as follows: EW - P3 Require the use of accidental discovery protocols to mitigate the potential risk to of earthworks to archaeological sites and sites and areas of significance to Māori and archaeological sites that are not scheduled in the Plan.
Silver Fern Farms Limited by its authorised agents Mitchell Daysh Limited (S441)	S441.028	Light	LIGHT - O1	Support	Silver Fern Farms agrees with the recognition that outdoor lighting enable night-time work, rural productive activities, transportation and public health and safety, insofar as it relates to their activities	Retain as notified
Silver Fern Farms Limited by its authorised agents Mitchell Daysh Limited (S441)	S441.029	Light	LIGHT - O2	Oppose in part	Silver Fern Farms disagrees with the requirement to not affect views of the night sky in industrial zones, where substantial lighting commensurate with 24/7 operations is necessary. Silver Fern Farms questions how resource users will comply with the requirement to "...not adversely affect the habitats and ecosystems of nocturnal native fauna and the species themselves".	Silver Fern Farms seeks changes to this objective and associated policies, to address these concerns, and to ensure that the protection of the night sky is limited to specifically identified areas, excluding industrial zones, or is only applied to areas specifically identified as 'intrinsically dark landscapes' (see LIGHT - P-3 below).

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Silver Fern Farms Limited by its authorised agents Mitchell Daysh Limited (S441)	S441.030	Light	LIGHT - P1	Amend	Silver Fern Farms supports the policy in principle as it provides for the ongoing use of outdoor lighting for existing operations. SFF opposes the requirement for outdoor lighting to maintain character and amenity values of surrounding areas noting that the council has proposed to rezone adjacent land for GRZ purposes. Existing and future operations of the existing plant (including artificial outdoor lighting) will likely compromise the character and amenity values of the GRZ and will give rise to reverse sensitivity effects.	Retain policy as notified subject to the following amendment to sub-paragraph (b) b. Maintains the character and amenity values of the zone <del>and surrounding area</del> ;
Silver Fern Farms Limited by its authorised agents Mitchell Daysh Limited (S441)	S441.031	Light	LIGHT - P3	Amend	Silver Fern Farms considers that the requirement of sub-clause (c) and sub-clause (e) could unduly restrict numerous important industrial activities and industrial zones, particularly where industrial zones border the proposed rezoning of rural land to general residential zone. Artificial outdoor lighting is important for managing health and safety requirements for Site operations, as such, Silver Fern Farms consider a further sub-clause should be included to highlight the need for artificial outdoor lighting for health and safety purposes. Furthermore, existing and future operations of the existing plant (including artificial outdoor lighting) will likely compromise the character and amenity values of the proposed GRZ and GRUZ and will give rise to reverse sensitivity effects for the Plant.	Silver Fern Farms seeks that the policy be amended as follows: [...] c. Minimises adverse effects on views of the night sky and intrinsically dark landscapes <b>except in industrial zones</b> ; [...] Minimises adverse effects on the health and safety of people and communities in the <del>surrounding area zone</del> . <b>Ensure that during the establishment of any new light sensitive areas or uses that conflict is avoided with existing activities that require artificial light for health and safety purposes.</b> Silver Fern Farms also recommends that 'intrinsically dark landscapes' be mapped in the District Plan maps.



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Silver Fern Farms Limited by its authorised agents Mitchell Daysh Limited (S441)	S441.032	Light	LIGHT - R1	Amend	Silver Fern Farms considers that sub-clause 3 does not recognise the existing essential operations which occur at the Plant (including artificial outdoor lighting) and submits that it cannot be realistically achieved at the boundary with the proposed adjoining zones GRUZ and surrounding GRZ.	Silver Fern Farms seeks that the policy be amended as follows: 3. Where an activity is located on a site which adjoins or is separated by a road from a different zone, the activity on the site must meet the relevant zone standards for light for the adjoining zone at the zone boundary, <b>except for the GIZ located at no. 140 Kumara Junction Highway, Hokitika.</b>
Silver Fern Farms Limited by its authorised agents Mitchell Daysh Limited (S441)	S441.033	Light	LIGHT - R2	Oppose	Clause d. is overly restrictive in regards to where any potential effect needs to be managed. If bounded by a paddock for example, there would be no effect 2 m inside the boundary of the site.	Amend Clause d. as follows. <del>The above standards a-c shall be measured 2m inside the boundary of any adjoining site or the closest window in the adjoining property, whichever is the closest to the light source.</del> <b>The maximum level of light spill from any site shall meet the above standards measured at the notional boundary of any dwelling or building accommodating a sensitive activity.</b>
Silver Fern Farms Limited by its authorised agents Mitchell Daysh Limited (S441)	S441.034	Noise	Noise	Amend	Silver Fern Farms considers that this overview is important to alert the community to the nuisance effects that can arise when people choose to live in areas adjacent to industrial environments; however, they consider that 'meat processing plants' should also be captured here. The objectives and/or associated policies of this chapter should make it clear that sensitive activities located on land adjacent to/near industrial activities must hold different amenity expectations to those that would attach to land in urban residential zones. This overview highlights and summarises Silver Fern Farms'	Given the contradicting aims of this overview and the rezoning proposal, Silver Fern Farms therefore requests that the proposed rezoning of Rural Zone land into GRZ and MRZ adjacent to the Plant is removed from the Proposed District Plan. Also include the following amendments: Noise - Ngā Oro Overview [...] Where noise sensitive activities are established near existing noise-generating activities, or areas where higher noise levels are to be expected, reverse sensitivity effects can arise, potentially resulting in the existing noise-generating activities being constrained, in terms of their ongoing operation or

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					concerns around the reverse sensitivity effects which would very likely be created if the land adjacent to the Plant is converted to GRUZ, GRZ, and MRZ through the proposed rezoning. Silver Fern Farm notes, that the proposed rezoning of the aforementioned land is in direct conflict with this overview.	expansion. This is a particular concern for important services and community facilities, including Airports and Heliports, Sports Grounds and Stadiums, the State Highway, Railway Corridors, <b>meat processing plants</b> and the Ports, which could be constrained if reverse sensitivity effects arise. [...]
Silver Fern Farms Limited by its authorised agents Mitchell Daysh Limited (S441)	S441.035	Noise	NOISE - O1	Support	Silver Fern Farm supports this objective to recognise that each zone will have differing needs with respect to noise, particularly in the Industrial Zones where activities that are typical to these areas are geographically limited in spatial planning.	Retain as notified.
Silver Fern Farms Limited by its authorised agents Mitchell Daysh Limited (S441)	S441.036	Noise	NOISE - O2	Support	Silver Fern Farms supports this objective and considers it appropriate to recognise the effect of reverse sensitivity from noise-sensitive activities.	Retain as notified.
Silver Fern Farms Limited by its authorised agents Mitchell Daysh Limited (S441)	S441.037	Noise	NOISE - O3	Support in part	Silver Fern Farms supports the broad direction of this objective but considers that this objective is too general and subjective in nature.	Silver Fern Farms suggest the objective be amended as follows: NOISE - O3 The health and wellbeing of people and communities <b>of the zone</b> are protected from significant levels of noise <b>that are inconsistent with role and character of the zone.</b>
Silver Fern Farms Limited by its authorised agents Mitchell Daysh Limited (S441)	S441.038	Noise	NOISE - P1	Support in part	Silver Fern Farms supports the principle of this policy, as it is a function of the industrial areas to create noise at levels which can be substantially higher than in other zones. Silver Fern Farm points out that in the case of the Plant, higher noise levels are to be expected from existing operations and, as such, any rezoning which is to occur at the	Amend as follows: NOISE - P1 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 critical

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					boundary of the site should not facilitate any sensitive activities.	infrastructure; Methods of mitigation; and The sensitivity of the surrounding environment <b>taking into account the potential reverse sensitivity effects where new noise sensitive activities are established adjacent to higher noise environments</b>
Silver Fern Farms Limited by its authorised agents Mitchell Daysh Limited (S441)	S441.039	Noise	NOISE - P2	Support in part	Silver Fern Farms considers that this policy is important to alert the community to the nuisance effects that can arise when people choose to live in rural/industrial environments. However, the objective and/or associated policies should make it clear that sensitive activities located on land adjacent to/near industrial activities (or rural activities) must hold different amenity expectations to those that would attach to land in urban residential zones.	Silver Fern Farms recommends that the policy be amended to clarify that the burden of management lies with the new activity and not the existing noise generating activity. Silver Fern Farms suggests the following amendments: NOISE - P2 Require sensitive activities sited in higher noise environments <b>and new noise sensitive activities adjacent to higher noise environments</b> , to be located and designed so as to minimise adverse effects on the amenity values, public health and wellbeing and the safety of occupants and minimise sleep disturbance from noise, while taking into account: [...]
Silver Fern Farms Limited by its authorised agents Mitchell Daysh Limited (S441)	S441.040	Noise	NOISE - P4	Support in part	Silver Fern Farm supports this policy to ensure that noise effects are consistent to the role and character of each zone but notes that the role and function of certain zones (e.g., Industrial Zone) will have differing needs with respect to noise generating activities. Careful spatial planning should ensure that existing activities are not hindered as a result of rezoned land allocated next to higher noises environments.	Silver Fern Farm suggests the following amendment: NOISE - P4 Ensure noise effects generated by an activity are of a type, scale and level that are appropriate for the predominant role, function and character of the receiving environment and protect the health and wellbeing of people and communities by having regard to: a Maximum noise limits to reflect the character and amenity of each zone; b Type, scale and location of the activity in relation to any noise sensitive activities; c Hours of operation and duration of activity;

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						d The temporary or permanent nature of any adverse effects; and e The ability to internalise and/or minimise any conflict with adjacent activities within the zone
Silver Fern Farms Limited by its authorised agents Mitchell Daysh Limited (S441)	S441.041	Noise	NOISE - R3	Amend	Silver Fern Farms agrees that it is appropriate that impacts from external noise sources are mitigated by suitable acoustic insulation in new buildings and or alterations to existing buildings. However, they request that new buildings or additions/alterations to existing buildings <b>for use by sensitive activities adjacent to an industrial site</b> be designed, constructed, and maintained in accordance with the design certificate from a suitably qualified acoustic engineer which certifies that the building will achieve the required internal sound levels	NOISE [...] 2. <b>For new buildings and additions or alterations to existing buildings for use by a noise sensitive activity adjacent to an industrial site, compliance with (1) above shall be achieved if an acoustic design certificate from a suitably qualified acoustic engineer is provided to the Council which certifies that the proposed design and construction of the building, alterations or additions will achieve the required internal sound levels. The building shall be designed, constructed, and maintained in accordance with the design certificate.</b>
Silver Fern Farms Limited by its authorised agents Mitchell Daysh Limited (S441)	S441.042	Noise	NOISE - R8	Oppose	Silver Fern Farms are of the view that this rule is unduly restrictive of the existing permitted activities which occur at the Plant and given the proposed rezoning of adjacent land to categories GRUZ, GRZ, and MRZ, this rule will unreasonably constrain the functional operations of the Plant. Furthermore, Silver Fern Farms understands that the now outdated L10 noise measurement specified in Table 5.1 of the Westland District Plan is louder than the currently used LAeq measurement. As such the TTPP-proposed rule 1(b) reduces the night-time noise limit for industrial zones to	Amend Rule NOISE - R8(1)(b) to provide a commensurate permitted noise level to that specified in Table 5.1 of the Westland District Plan. Remove the proposed zoning of GRZ and MRZ adjacent to the Silver Fern Farms Plant (140 Kumara Junction Highway, Hokitika).

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					<p>45 dB LAeq (15 min) from 50 db L10 (per Table 5.1 of the Operative Westland District Plan. This is of note given the s32 evaluation of options around noise management (section 4.2.2 of the Report 7 s32 report) states the current noise rules "...have been operating without significant concern for the last 20 years".</p> <p>The upshot appears to be a significant reduction in the permitted baseline for nighttime noise in the Industrial Zones. Silver Fern Farms opposes this as inappropriate given the functional need for industrial activities to generate noise.</p> <p>Silver Fern Farms also reiterates its opposition to the proposed residential rezoning of land near its site, as this may generate potentially significant reverse sensitivity effects.</p> <p>Amendments to Rule NOISE - R3 for acoustic insulation as suggested with respect to rule NOISE-R3 will help to reduce the effects of noise on any future noise sensitive activities seeking to establish in the environs around the site.</p>	
Silver Fern Farms Limited by its authorised agents Mitchell Daysh Limited (S441)	S441.043	Industrial Zones	INZ - O1	Support in part	<p>Silver Fern Farms supports the policy in principle as it provides for the ongoing operations and future development at the existing plant. However, the requirement of "... and does not compromise the amenity of adjoining areas" appears to conflict with the objective of the INZ - 01, as the council has proposed to rezone land adjacent to the Plant for GRUZ and GRZ purposes. Rather, the Proposed Plan</p>	<p>Amend as follows:  INZ - O1 To provide for the efficient and effective operation and development of industrial activities in the INZ - Industrial Zones in a manner that maintains a standard of amenity appropriate to these areas <del>and does not compromise the amenity of adjoining areas.</del></p>

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					<p>should <b>enable and promote</b> the operation of industry in their designated zones by imposing amenity values which are compatible with the purpose of zoning.</p> <p>The existing operation (in an environment with minimal sensitive land uses) and future operations of the existing plant (including development) will likely compromise the character and amenity values of the GRZ and will give rise to reverse sensitivity effects received by the existing Plant.</p>	
Silver Fern Farms Limited by its authorised agents Mitchell Daysh Limited (S441)	S441.044	Industrial Zones	INZ - O2	Support	Silver Fern Farms considers this objective provides appropriate guidance about the outcomes sought for the industrial zones.	Retain as notified
Silver Fern Farms Limited by its authorised agents Mitchell Daysh Limited (S441)	S441.045	Industrial Zones	INZ - P1	Support	Silver Fern Farms supports the policy.	Retain as notified
Silver Fern Farms Limited by its authorised agents Mitchell Daysh Limited (S441)	S441.046	Industrial Zones	INZ - P2	Support	Silver Fern Farms supports the policy.	Retain as notified
Silver Fern Farms Limited by its authorised agents	S441.047	Industrial Zones	INZ - P3	Support	Silver Fern Farms supports the policy.	Retain as notified

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Mitchell Daysh Limited (S441)						
Silver Fern Farms Limited by its authorised agents Mitchell Daysh Limited (S441)	S441.048	Industrial Zones	INZ - P4	Support	Silver Fern Farms recognises the underlying intent of this proposed policy is to minimise the risk of conflict between incompatible land uses. It notes that this policy does not require rural industry to locate in urban industrial zones, as the policy relies on the presence of "suitable" land before the proposal is directed to locate in the INZ - Industrial Zones.	Retain as notified.
Silver Fern Farms Limited by its authorised agents Mitchell Daysh Limited (S441)	S441.049	Industrial Zones	INZ - P5	Support	Silver Fern Farms supports the policy.	Retain as notified
Silver Fern Farms Limited by its authorised agents Mitchell Daysh Limited (S441)	S441.050	Industrial Zones	INZ - P6	Amend	Silver Fern Farms supports the broad direction of this policy but considers that the reference in the policy to an "acceptable" level of environmental quality and amenity is inappropriately vague. Silver Fern Farms considers that this policy should support the fundamental purpose of these zones, which (particularly for the General Industry Zone and Heavy Industry Zone) is to provide land for the establishment and operation of large-scale, intensive activities that operate at all hours and are associated with robust buildings, heavy vehicle movements and light and noise emissions.	Amend as follows: INZ - P6 Provide for a wide range of industrial and compatible activities, <b>and corresponding environmental quality and amenity</b> , within the INZ - Industrial Zones, <del>while ensuring an acceptable level of environmental quality and amenity within the zones.</del>
Silver Fern Farms Limited by its authorised agents Mitchell Daysh Limited (S441)	S441.051	Industrial Zones	INZ - P7	Support	Silver Fern Farms broadly supports the direction about reverse sensitivity provided by this policy. However, it recommends the following amendments.	a Amend as follows: INZ - P7 Avoid activities that may be incompatible with <del>other</del> industrial activities from establishing in the INZ - Industrial Zones, to ensure the safe and efficient operation of industrial

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					<p>Policy preamble The reference to "other industrial activities" in the policy preamble infers that the problematic new activity in question is itself an industrial activity. This is unlikely to be the case. New activities that are incompatible with industry are more likely to be non-industrial, as is indicated by the direction in sub-clause (b) to "...minimise the development of GIZ - General Industrial Zoned land for non-industrial purposes". As such, it is recommended that the term "other" be deleted from the policy preamble.</p> <p>Sub-clause (a) Worker shortages are a well-known industry issue affecting the efficient operation of meat processing sites. As part of the solution to this issue, meat processing businesses are considering investing in providing on-site accommodation to assist in attracting and retaining staff. This should be provided for in the Plan.</p> <p>Sub-clause (b) Silver Fern Farms considers sub-clause (b) would be improved if the phrase "are not related to" were replaced with "are not an ancillary activity to". This recommended amendment applies the defined term "ancillary activity" to clearly state the link with industrial land use that might support a resource consent application seeking to establish a non-industrial activity in the General Industrial Zone. In Silver Fern Farms' opinion "related to" implies a potentially tenuous link.</p>	<p>activities. This includes: Excluding activities (such as residential - <b>excepting residential activities ancillary to an industrial activity</b>) and visitor accommodation) that conflict with the intended purpose of the zone through the potential for reverse sensitivity effects; or by reducing the land available for industrial and service activities; Excluding retail and commercial activities from GIZ - General Industrial Zoned land that do not support or are not related to industrial <del>and</del> <b>service</b> activities, and to minimise the development of GIZ - General Industrial Zoned land for non-industrial purposes; and Restricting residential activities in the INZ - Industrial Zones to only custodial units for people whose duties require them to live on site.</p>



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					For example, an office that has commercial dealings with industrial businesses may arguably be "related to" industry. However, a relationship of this nature may not warrant the office locating in an industrial zone and (inefficiently) using the industrial land resource and supporting infrastructure for non-industrial purposes. The term "service activities" is undefined. As sub-clause (b) relates specifically to the General Industrial Zone, Silver Fern Farms considers that the inclusion of this undefined use may inappropriately facilitate non-industrial activities that would be more appropriately located in the Light Industrial Zone or in a commercial zone.	
Silver Fern Farms Limited by its authorised agents Mitchell Daysh Limited (S441)	S441.052	Industrial Zones	INZ - P8	Oppose	Silver Fern Farm considers this policy is unduly restrictive and will give rise to reverse sensitivity effects. Silver Fern Farms also considers the policy appears in conflict with the fundamental purpose of the INZ, which is to provide land for the establishment and operation of large-scale, intensive activities that operate at all hours which will likely compromise the character and amenity values of the surrounding zones	Amend as follows: INZ - P8 Impose performance standards on development and land use in the INZ - Industrial Zones that protects the amenity values of the commercial, residential and rural areas surrounding the INZ - Industrial Zones. INZ - P8 Manage <b>adverse effects of activities within the zone to maintain the character and amenity of adjoining zones</b>
Silver Fern Farms Limited by its authorised agents Mitchell Daysh Limited (S441)	S441.053	Industrial Zones	INZ - P9	Oppose in part	Silver Fern Farms considers this policy to be vague and subjective in reference to Industrial sites at the "...gateways to Hokitika (SH6), Reefton (SH7 and SH69), Greymouth/Māwhera (SH6) and Westport/Kawatiri (SH 67), and where in close proximity to residential areas".	Amend to include definitions for "gateways" and "close proximity to residential areas" and to include set distances (metres) in which those definitions take effect, and specify these areas on the Planning Maps.

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Silver Fern Farms Limited by its authorised agents Mitchell Daysh Limited (S441)	S441.054	Industrial Zones	INZ - P10	Support	Silver Fern Farms supports the broad direction of this policy	Retain as notified
Silver Fern Farms Limited by its authorised agents Mitchell Daysh Limited (S441)	S441.055	Industrial Zones	INZ - P11	Amend	While Silver Fern Farms supports the direction of this policy, stormwater discharges into the environment are typically controlled by a regional council. This policy should be narrowed so that it focuses on discharges on stormwater into the Council controlled stormwater network.	Amend as discussed in 'reasons' field.
Silver Fern Farms Limited by its authorised agents Mitchell Daysh Limited (S441)	S441.056	General Industrial Zone	GIZ	Support	Silver Fern Farms supports the overview insofar as it relates to its activities. Particularly the need for provisions of adverse effects generated by essential industrial activities (noise, glare, odour etc). Sensitive activities, such as residential and commercial activities, unless these are ancillary to the industrial use, are inappropriate in industrial locations and should be located an appropriate distance away from industrial zones.	Retain as notified.
Silver Fern Farms Limited by its authorised agents Mitchell Daysh Limited (S441)	S441.057	General Industrial Zone	GIZ - R1	Support in part	Silver Fern Farms supports the general concept of this Rule. However, regarding sub-paragraph 8, further clarification is needed. of contaminated stormwater and treatment methods are required as currently the Rule is too vague.	Suggest amending to: GIZ - R1 Industrial Activities and Industrial Buildings Activity Status Permitted Where: [...] 8. Contaminated stormwater run-off associated with any industrial activity or building, including stormwater runoff from any earthworks, shall be collected and treated prior to discharge to a council-controlled stormwater network to ensure there are no significant adverse effects on water quality;

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Silver Fern Farms Limited by its authorised agents Mitchell Daysh Limited (S441)	S441.058	General Industrial Zone	GIZ - R2	Oppose	Silver Fern Farms view the implementation of this Rule to be unclear in the context of GIZ - R1 and the definition of "Structure" in the Proposed District Plan which relates to buildings. Given the built form requirements in GIZ - R1, Silver Fern Farm queries the requirement for such a comparatively low threshold for GIZ - R2.	Delete this rule.
Silver Fern Farms Limited by its authorised agents Mitchell Daysh Limited (S441)	S441.059	General Industrial Zone	GIZ - R5	Amend	As discussed above, worker shortages are a well-known industry issue affecting the efficient operation of meat processing sites. As part of the solution to this issue, meat processing businesses are considering investing in providing on-site accommodation to assist in attracting and retaining staff. This should be provided for in the Plan.	Recommend changes as follows: 1. All performance standards for Rule GIZ - R1 are complied with; 2. One single residential unit per site is provided; and 3. The residential activity is ancillary to the commercial or industrial activity on the site.
Silver Fern Farms Limited by its authorised agents Mitchell Daysh Limited (S441)	S441.060	General Industrial Zone	GIZ - R9	Oppose in part	Silver Fern Farms notes that sub-clause (c) is superfluous in this instance as an existing Chapter addresses this point already. To address ambiguity, it is recommended that this sub-clause be deleted.	Silver Fern Farms suggests deleting the duplicate control for sub-clause (c) as follows: GIZ - R9 Industrial Activities and Buildings not meeting Permitted Activity standards Activity Status Restricted Discretionary Where: 1. The building projects into the recession plane; and 2. All other performance standards for Rule GIZ - R1 are complied with. Discretion is restricted to: a. Design and location of buildings; b. Design and location of parking and access; c. Management of hazardous substances in accordance with the objectives and policies of the Hazardous Substances chapter; and b. Landscape treatment.

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Silver Fern Farms Limited by its authorised agents Mitchell Daysh Limited (S441)	S441.061	General Industrial Zone	GIZ - R10	Oppose	As stated above for GIZ - R2, Silver Fern Farms queries the comparatively low threshold for the height of structures (relative to GIZ - R2) within the GIZ.	Delete / remove Rule.
Silver Fern Farms Limited by its authorised agents Mitchell Daysh Limited (S441)	S441.062	General Industrial Zone	GIZ	Support in part	<p>Silver Fern Farm support the overall concept of this statement but note that the Operative Plan identifies the land adjacent to the Silver Fern Farms processing plant (which is proposed as GRZ) is in a location that is unsuitable for residential zoning due to the lack of services infrastructure.</p> <p>Silver Fern Farms highlights that the rezoning of this area has the potential to provide poor land use conflict due to the existing operations at the Plant which is situated in a rural environment with few sensitive activities nearby . Several of the RESZ objectives and policies detail the outcomes being sought in the residential zone which will potentially not be achieved with the proposed rezoning of rural land to GRZ in very close proximity the Silver Fern Farms processing plant.</p> <p>These include:</p> <p>RESZ - O2 To maintain or enhance the distinctive character, amenity and heritage values of residential areas, build community resilience and protect these areas from the adverse effects of inappropriate development.</p> <p>RESZ - P2 Activities in the RESZ - Residential Zones should:</p> <ol style="list-style-type: none"> <li>a. Maintain or enhance residential character;</li> <li>b. Minimise nuisance from noise, light</li> </ol>	Delete the proposed residential rezoning from land adjacent to Silver Fern Farms' Hokitika site.

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					<p>spill and vibration;</p> <p>c. Maintain and enhance the natural and cultural heritage features of the zone;</p> <p>d. Maintain reasonable levels of sunlight and daylight access for residential properties;</p> <p>e. Maintain reasonable levels of privacy for residential properties;</p> <p>f. Maintain visual amenity by avoiding accessory buildings dominating streetscape and urban form; and</p> <p>g. Provide safe, efficient and easily accessible movement for pedestrians, cyclists and vehicles.</p> <p>RESZ - P4 - Enable existing non-residential activities and home occupations to continue and new non-residential activities to establish provided they do not have a significant adverse effect on the character and amenity of RESZ - Residential Zones, particularly in relation to scale, car parking, vehicle movements, noise, visual appearance, glare, dust and odour.</p> <p>RESZ - P5 Industrial Activities, and non-residential activities which involve noxious, offensive and dangerous activities and those with a significant negative impact on amenity shall not be located in RESZ - Residential Zones.</p> <p>RESZ - P9 - New development and redevelopment in RESZ - Residential Zones should connect to existing community infrastructure investment.</p> <p>RESZ - P10 Ensure that developments are serviced with all required</p>	

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					infrastructure in an effective and efficient manner, while minimising impacts on the environment. Where new infrastructure such as roads and three waters (wastewater, water supply, stormwater) is provided to serve multiple households this infrastructure should be vested in the appropriate public agency. While Silver Fern Farms support the principle behind these objectives and policies, the Company note that by way of their function, these objectives and policies will not be consistent with the likely outcome of the proposal to rezone land adjacent to the processing plant at 140 Kumara Junction Highway due the reduced amenity that comes with industrial activities. The Operative Plan also notes that the land in this location would provide poor residential amenity.	
Silver Fern Farms Limited by its authorised agents Mitchell Daysh Limited (S441)	S441.063	Residential Zones	RESZ - O3	Amend	The use of the word "area" In this objective could be interpreted as meaning this objective extends to areas outside the zone which would be inappropriate.	RESZ-O3 - To provide for a range of non-residential activities within RESZ - Residential Zones where the effects are compatible with the residential character, scale and amenities and the cultural and historic heritage values of the <b>zone area</b> .
Silver Fern Farms Limited by its authorised agents Mitchell Daysh Limited (S441)	S441.064	Residential Zones	RESZ - P16	Support in part	Silver Fern Farm is of the opinion that this policy should also provide for the avoidance of reverse sensitivity effects from residential development adjacent to Industrial activities, such as the processing plant at 140 Kumara Junction Highway.	a RESZ - P16 Avoid reverse sensitivity effects from residential development adjacent to strategic infrastructure <b>and existing business and industrial activity</b> including: Hokitika, Greymouth and Westport Airports; The rail network; The arterial road and State Highway network; The Ports of Westport and Greymouth; Wastewater treatment plants; Landfills; Potable water supply plants

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						Stormwater treatment facilities; The National Grid The meat processing plant located at 140 Kumara Junction highway.
Silver Fern Farms Limited by its authorised agents Mitchell Daysh Limited (S441)	S441.065	Rural Zones	RURZ	Support in part	Silver Fern Farms support this statement insofar as it relates to their activities at the 140 Kumara Junction Highway processing plant. Silver Fern Farms highlight the need to limit lifestyle subdivision as well as non-rural activities which aren't associated with primary production within the zone due to the potential reverse sensitivity effects which may be imposed on existing permitted activities.	Retain as notified
Silver Fern Farms Limited by its authorised agents Mitchell Daysh Limited (S441)	S441.066	Rural Zones	RURZ - P6	Support in part	Silver Fern Farm support this policy insofar as it relates to its activities and notes that a prime example of why this policy is necessary is their Plant at 140 Kumara Junction Highway, Hokitika. Under the Operative Plan, this site is classed as Rural Zone, however, under the Proposed Plan, this land would change to General Industrial and would be located at the boundary of the General Rural Zone. This Policy is appropriate for highlighting that some industrial activities have a functional need to be located in proximity to rural areas, however Silver Fern Farm notes that the zoning difference between the two areas will likely have differing amenity requirements based on the types of activities conducted in each area. Silver Fern Farms are of the view that this should be addressed in the case of 140 Kumara Junction Highway and mention	Retain Operative Plan definition of Rural Zoning definition.

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					that in respect to this, prior acceptance of reduced amenity in these areas should be expected.	
Silver Fern Farms Limited by its authorised agents Mitchell Daysh Limited (S441)	S441.067	Rural Zones	RURZ - P7	Support in part	As mentioned in RURZ - P6, above.	Retain Operative Plan definition of Rural Zoning definition.
Silver Fern Farms Limited by its authorised agents Mitchell Daysh Limited (S441)	S441.068	Rural Zones	RURZ - P8	Support in part	As mentioned in RURZ - P6, above.	Retain Operative Plan definition of Rural Zoning definition.
Silver Fern Farms Limited by its authorised agents Mitchell Daysh Limited (S441)	S441.069	Rural Zones	RURZ - P16	Amend	Reverse sensitivity effects can also impede industrial activities and that should be acknowledged in this policy.	Amend as follows: There should be sufficient buffers provided from infrastructure such as wastewater treatment plants and land disposal areas, transmission infrastructure, <del>and</del> water supply catchments <b>and industry</b> to avoid reverse sensitivity effects on the infrastructure.
Silver Fern Farms Limited by its authorised agents Mitchell Daysh Limited (S441)	S441.070	General Rural Zone	GRUZ	Amend	Silver Fern Farms agrees that it is appropriate that impacts from external noise sources are mitigated by suitable acoustic insulation in new buildings and or alterations to existing buildings. However, they request that new buildings, additions or alterations to existing buildings for use by sensitive activities adjacent to an industrial site be designed, constructed, and maintained in accordance with the design certificate from a suitably qualified acoustic engineer which certifies that the building will achieve the required internal sound levels.	Amend as follows: GRUZ - R3 - Residential Activities and Residential Units [...] Advice Note: Where a residential building or noise sensitive activity is located within: 80m 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 iii. 40m of a Railway Line; or The 50 dBA Noise Contour boundary of Franz Josef Heliport; or The 55 dBA Noise Contour boundary of the Westport or Hokitika Airports or Greymouth or Karamea Aerodrome; or <b>Where new buildings, additions, or alterations to</b>



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						<b>existing buildings for use by sensitive activities adjacent to an industrial site</b> Then the acoustic insulation requirements are set out in Rule NOISE - R3 will apply.
Skyline Enterprises Limited (S250)	S250.001	General Rural Zone	General Rural Zone - Rules	Oppose	The provisions for the General Rural Zone - Te Takiwā Tuawhenua Whānui do not contain provisions that would be enabling of a future Aerial Cableway at Franz Josef Glacier. It is considered that the proposal would be deemed a 'Non-Rural Activity' and would require either a Discretionary or Non-Complying Activity Consent.	The proposed Amenities Area should be identified on the planning maps and the provisions in the General Rural Zone - Te Takiwā Tuawhenua Whānui chapter to enable development of an aerial cableway at Franz Josef Glacier.
Skyline Enterprises Limited (S250)	S250.002	Natural Open Space Zone	Natural Open Space Zone	Oppose	The Natural Open Space Zone does not contain provisions that would be enabling of a future Aerial Cableway at Franz Josef. Specifically, the submitters vision for such a proposal would not fall within the Permitted Activity requirements for 'Park Facilities and Furniture' and vehicle access and car parking would not be ancillary to a Permitted Activity. Accordingly, an Aerial Cableway and ancillary parking and access would need to be considered as a Non-Complying Activity.	The proposed Amenities Area for a Franz Josef Cableway should be identified on the planning maps and the provisions in the Natural Open Space Zone - Te Takiwā Pōaha Aotūroa chapter to enable consideration of such a development and the Objective, Policy, and Rule framework should enable the development of an appropriately designed Aerial Cableway in the Franz Josef Glacier/Ka Roimata o Hinehukatere Valley.
Skyline Enterprises Limited (S250)	S250.003	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori	Oppose	In the Sites and Areas of Significance to Māori - Ngā Wāhi Tāpua ki te Māori chapter it appears that development of an Aerial Cableway would by virtue of its necessary earthworks being more than 'minor earthworks', necessitate a Discretionary Activity Consent and that automatic limited notification would be required to the relevant Poutini Ngai Tahu. The Objectives and Polices in this	The proposed Amenities Area and development of an aerial cableway to Franz Josef should be provided for in the provisions in the Sites and Areas of Significance to Māori - Ngā Wāhi Tāpua ki te Māori chapter enable consideration of such a development

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					chapter specify that sites and areas of significance to Māori be protected from inappropriate use and development and the Policies for inappropriate activities specifically requires restriction of buildings, structures, and earthworks on the upper slopes of ancestral maunga in Schedule Three.	
Skyline Enterprises Limited (S250)	S250.004	Natural Features and Landscapes	Natural Features and Landscapes	Oppose	It is noted that in the TTPP 'Conservation Activities' are provided for within ONL and ONF's However, it is not clear that providing an Aerial Cableway by a commercial entity (such as the submitter) would fall within the scope of this definition.	That the proposed aerial cableway at Franz Josef should be identified within the provisions in the Natural Features and Landscapes - Ngā Āhua me ngā Horanuku Aotūroa chapter to enable consideration of such a development.
Skyline Enterprises Limited (S250)	S250.005	SPZ - Special Purpose Zones	SPZ - Special Purpose Zones	Amend	The submitter considers that the same can be said for the TTPP and considers that the best solution to providing for an aerial cableway at Franz Josef would be to have an Amenities Area chapter in the Special Purposes Zones section of the TTPP.	Provide for a New Special Purpose Zone for the Amenities Area to support the Franz Josef Aerial Cableway. It is considered that an Aerial Cableway and ancillary access and parking within the Amenities Area Zone should be a Discretionary Activity supported by the following Objectives and Policy framework: Objective 1(a) Within the Franz Josef Glacier/Ka Roimata o Hinehukatere Valley Amenities Area, high quality visitor experiences are provided that enable visitors to access and appreciate the dynamic glacial environment. Objective 1(b) The development of a single Aerial Cableway within the Franz Josef Glacier/Ka Roimata o Hinehukatere Valley Amenities Area that provides for appreciation of the outstanding universal values of the park by the general public shall be enabled. Policy 1.1 With the exception of a temporary construction Aerial Cableway (if required), ensure that there is no more than one Aerial Cableway within the Franz Josef Glacier/Ka

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						<p>Roimata o Hinehukatere Valley Amenities Area.</p> <p>Policy 1.2 Development of an Aerial Cableway within the Franz Josef Glacier/Ka Roimata o Hinehukatere Valley Amenities Area will only be undertaken to provide public access to views of the Franz Josef Glacier/Ka Roimata o Hinehukatere Valley and where appropriate to do so, recreational access to the glacier valley.</p> <p>Policy 1.3 Development of ancillary commercial and retail facilities beyond the base terminal area within the Franz Josef Glacier/Ka Roimata o Hinehukatere Valley Amenities Area will not be authorised.</p> <p>Policy 1.4 Congestion and diminished visitor satisfaction within the Franz Josef Glacier/Ka Roimata o Hinehukatere Valley Amenities Area will be managed through consideration of the timing of the Aerial Cableway return trip, proposed visitor capacity per hour, and the anticipated extent of time for visitor appreciation at the upper terminus.</p> <p>Policy 1.5 The visitor capacity of an Aerial Cableway and upper terminus within the Franz Josef Glacier/Ka Roimata o Hinehukatere Valley Amenities Area may be limited to ensure the provision of a high-quality visitor experience and the opportunity to view and appreciate the outstanding universal values of the Franz Josef Glacier/Ka Roimata o Hinehukatere Valley is maintained.</p> <p>Objective 2 Development of an Aerial Cableway within the Franz Josef Glacier/Ka Roimata o Hinehukatere Valley Amenities Area only occurs where the risks from natural hazards to visitors and built form are appropriately minimised.</p> <p>Policy 2.1 Recognise that Franz Josef</p>

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						<p>Glacier/Ka Roimata o Hinehukatere Valley Amenities Area is known to be subject to natural hazard risk and minimise such risk on an aerial cableway as far as is reasonably practicable while acknowledging that visitors may be prepared to tolerate a level of residual risk.</p> <p>Policy 2.2 Ensure any future Aerial Cableway within the Franz Josef Glacier/Ka Roimata o Hinehukatere Valley Amenities Area is constructed and located so as to avoid or mitigate:</p> <ul style="list-style-type: none"> <li>a. significant natural hazard risk to human life; and</li> <li>b. the potential risk of damage to the Aerial Cableway and associated infrastructure from natural hazards to the extent practicable.</li> </ul> <p>Policy 2.3 Ensure any proposal to develop an Aerial Cableway within the Franz Josef Glacier/Ka Roimata o Hinehukatere Valley Amenities Area adequately assesses natural hazards inclusive of the following information requirements, ensuring that the level of detail of the assessment is commensurate with the level of natural hazard risk:</p> <ul style="list-style-type: none"> <li>a. the likelihood of the natural hazard event occurring over no less than a 100-year period;</li> <li>b. the type and scale of the natural hazard(s) and the effects of a natural hazard on the Amenities Area;</li> <li>c. the effects of climate change on the frequency and scale of the natural hazard(s);</li> <li>d. the vulnerability of the Aerial Cableway in relation to the natural hazard(s);</li> <li>e. the potential for the Aerial Cableway to exacerbate the natural hazard risk both within and beyond the Amenities Area;</li> <li>f. the location, design and construction of buildings and structures associated with the</li> </ul>

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						<p>Aerial Cableway to mitigate the effects of natural hazards, such as the raising of floor levels;</p> <p>g. management techniques that avoid or manage natural hazard risk to a tolerable level, including with respect to ingress and egress of visitors and emergency services during a natural hazard event.</p> <p>Policy 2.4 Visitors to the Franz Josef Glacier/Ka Roimata o Hinehukatere Valley Amenities Area shall be educated of the natural hazard risk by warning signage so they can make an informed decision to utilise the Aerial Cableway.</p> <p>Policy 2.5 Ensure any proposal to develop an Aerial Cableway within the Franz Josef Glacier/Ka Roimata o Hinehukatere Valley Amenities Area includes a Natural Hazards Event Response Plan outlining the process of evacuating visitors if a natural hazard event occurs or is expected to occur during operation.</p> <p>Objective 3(a) The development of an aerial cableway within the Franz Josef Glacier/Ka Roimata o Hinehukatere Valley Amenities Area is enabled where the potential adverse effects on the outstanding universal landscape values are appropriately mitigated.</p> <p>Objective 3(b) The natural features and glaciological and geological history of Ka Tiritiri o Te Moana (Glaciers) Place is preserved and interpreted in an engaging way for visitors.</p> <p>Policy 3.1 Recognise that development of built form is generally inappropriate in Westland Tai Poutini National Park meaning any successful application for an aerial cableway within the Franz Josef Glacier/Ka Roimata o Hinehukatere Valley Amenities Area will be an</p>

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						<p>exceptional case where the landscape can absorb the change and where the aerial cableway, associated buildings, infrastructure, and parking areas will not significantly degrade landscape quality or character, or important views.</p> <p>Policy 3.2 The prominence of all Aerial Cableway structures, and associated buildings shall be mitigated by ensuring the used of recessive colours and materials with a low light reflectance value.</p> <p>Policy 3.3 Encourage development of an Aerial Cableway within the Franz Josef Glacier/Ka Roimata o Hinehukatere Valley Amenities Area to utilise existing access and roading infrastructure, and to locate within the parts of he Amenities Area where it will minimise disruption to natural landforms and character.</p> <p>Policy 3.4 Ensure funding exists for removal of all structures and subsequent environmental rehabilitation of any Aerial Cableway within the Franz Josef Glacier/Ka Roimata o Hinehukatere Valley Amenities Area in the case of failed development by imposing a bond on through the resource consent process.</p> <p>Policy 3.5 Lighting associated with any Aerial Cableway proposal within the Franz Josef Glacier/Ka Roimata o Hinehukatere Valley Amenities Area shall be controlled such that it does not diminish appreciation of the natural night sky.</p> <p>Policy 3.6 All waste (including human waste) associated with an aerial cableway construction and on-going operation within the Franz Josef Glacier/Ka Roimata o Hinehukatere Valley Amenities Area shall be contained and removed from the Westland</p>

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						<p>National Park.</p> <p>Objective 4 Construction of an Aerial Cableway within the Franz Josef Glacier/Ka Roimata o Hinehukatere Valley Amenities Area will be completed in an efficient manner with the minimum of disturbance to existing Westland National Park visitors.</p> <p>Policy 4.1 The temporary construction effects on the quality of the visitor experience shall be controlled through detailed construction management planning detailed at the time of any consent application.</p> <p>Policy 4.2 The maintenance of public access along the Franz Josef Glacier Road and use of the Franz Josef Valley Carpark is to be maintained throughout the temporary construction period of any Aerial Cableway within the Franz Josef Glacier/Ka Roimata o Hinehukatere Valley Amenities Area</p> <p>Policy 4.3 Any proposal for an Aerial Cableway within the Franz Josef Glacier/Ka Roimata o Hinehukatere Valley Amenities Area will ensure that public access to the existing walking tracks in the Franz Josef Glacier Valley remains unimpeded throughout construction.</p> <p>Policy 4.4 Enable the use of aircraft for construction of an Aerial Cableway within the Franz Josef Glacier/Ka Roimata o Hinehukatere Valley Amenities Area provided effects on the quality of visitor experiences on the glacier valley floor walk, Roberts Point walk, Douglas Walk and the Lake Wombat track are managed through controls over timing, frequency of flights, and location of landing areas. to avoid, remedy or mitigate noise</p> <p>Objective 5 Development of Roding and Car Park Areas within the Franz Josef Glacier/Ka</p>

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						<p>Roimata o Hinehukatere Valley Amenities Area is undertaken in a manner which minimises vegetation clearance alteration to natural land forms and adverse effects on landscape and visual amenity values.</p> <p>Policy 5.1 Ensure that the location of roads, car parks and tracks occurs along the edges of existing landforms, vegetation patterns and car parking infrastructure.</p> <p>Policy 5.2 Any change in location of the existing car parking area in Franz Josef Glacier/Ka Roimata o Hinehukatere Valley Amenities Area to facilitate operation of base facilities for an Aerial Cableway shall not increase the available area of car parking that existed at the time this plan became operative.</p> <p>Policy 5.3 Any change to the roading and parking layout in Franz Josef Glacier/Ka Roimata o Hinehukatere Valley Amenities Area shall be limited to the minimum functional requirement for servicing, maintenance, and public access to the Aerial Cableway operation.</p> <p>Objective 6 Any aerial cableway established in the Franz Josef Glacier/Ka Roimata o Hinehukatere Valley Amenities Area will facilitate public and Concessionaire access to the Glacier where it is safe to do so.</p> <p>Policy 6.1 Any proposal for an Aerial Cableway within the Franz Josef Glacier/Ka Roimata o Hinehukatere Valley Amenities Area shall provide walking access from the upper terminus structure to the Almer Glacier/Salisbury Snowfield for competent private alpine enthusiasts, guiding Concessionaires and their clients.</p> <p>Policy 6.2 Any proposal for an Aerial Cableway within the Franz Josef Glacier/Ka</p>



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						<p>Roimata o Hinehukatere Valley Amenities Area with walking access from the upper terminus structure to the Almer Glacier/Salisbury Snowfield will incorporate a management regime to prevent unauthorised access by the general public.</p> <p>Policy 6.3 Any walking access provided from the upper terminus structure of any Aerial Cableway within the Franz Josef Glacier/Ka Roimata o Hinehukatere Valley Amenities Area to the Almer Glacier/Salisbury Snowfield shall be subject to an assessment of natural hazards.</p> <p>Objective 7 Land use and development maintains indigenous biodiversity values.</p> <p>Policy 7.1 Ensure the clearance of indigenous vegetation associated with an Aerial Cableway within the Franz Josef Glacier/Ka Roimata o Hinehukatere Valley Amenities Area does not significantly reduce natural character and indigenous biodiversity values or create erosion.</p> <p>Policy 7.2 Encourage opportunities to remedy adverse effects of constructing an Aerial Cableway within the Franz Josef Glacier/Ka Roimata o Hinehukatere Valley Amenities Area through the retention, rehabilitation, or protection of the same indigenous vegetation community elsewhere within the Amenities Area.</p> <p>Policy 7.3 Minimise disturbance of vegetation clearance associated with Aerial Cableway construction and operation within the Franz Josef Glacier/Ka Roimata o Hinehukatere Valley Amenities Area as the indigenous vegetation communities contribute to the distinct indigenous biodiversity and landscape qualities of the Franz Josef Glacier/Ka Roimata o Hinehukatere Valley and are</p>

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						<p>vulnerable to change.</p> <p>Policy 7.4 Enabling any residual adverse effects of an Aerial Cableway construction and operation within the Franz Josef Glacier/Ka Roimata o Hinehukatere Valley Amenities Area on indigenous vegetation or indigenous fauna to be offset through protection, restoration and enhancement actions that achieve no net loss and preferably a net gain in indigenous biodiversity values having regard to:</p> <p>i. limits to biodiversity offsetting due the affected biodiversity being irreplaceable or particularly vulnerable; and</p> <p>(ii) the ability of a proposed offset to demonstrate it can achieve no net loss or preferably a net gain;</p> <p>Objective 8 Mana whenua spiritual, cultural, and physical relationship with the Franz Josef Glacier/Ka Roimata o Hinehukatere Valley is protected and enhanced.</p> <p>Policy 8.1 Ensure that any proposal for an Aerial Cableway includes a cultural impact assessment;</p> <p>Policy 8.2 Promote the communication of mana whenua history and values to visitors of the National Park.</p> <p>Policy 8.2 Ensure that the communication of mana whenua history and values by Aerial Cableway operators is authorised through consultation with Makaawhio and Ngai Tahu.</p>
Skyline Enterprises Limited (S250)	S250.006	Planning Maps and Overlays	Rezoning Requests	Amend	The submitter opposes the mapping and all Objectives, Policies, and Rules of the TPPP that address development within the Franz Josef Glacier/Ka Roimata o Hinehukatere Valley and without derogating from the breadth of the submissions scope, specifically	Amend zoning from rural to sought news Special Purpose zone "Amenities Area"

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					have concern with the following: General Rural Zone, Natural Open Space Zone, Sites of Significance to Māori, Outstanding Natural Landscapes, Outstanding Natural Features	
Skyline Enterprises Limited (S250)	S250.008	Planning Maps and Overlays	Natural Features and Landscapes	Oppose	The submitter opposes the mapping and all Objectives, Policies, and Rules of the TTPP that address development within the Franz Josef Glacier/Ka Roimata o Hinehukatere Valley and without derogating from the breadth of the submissions scope, specifically have concern with the following: Outstanding Natural Landscapes, Outstanding Natural Features (ONF16)	Not stated
Skyline Enterprises Limited (S250)	S250.009	SCHED 3: SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 145	Oppose	The submitter opposes the mapping and all Objectives, Policies, and Rules of the TTPP that address development within the Franz Josef Glacier/Ka Roimata o Hinehukatere Valley and without derogating from the breadth of the submissions scope, specifically have concern with the following: Sites of Significance to Māori (SASM145).	Not stated
Skyline Enterprises Limited (S250)	S250.010	SCHED6 - SCHEDULE OF OUTSTANDING NATURAL FEATURES	ONF16	Oppose	The submitter opposes the mapping and all Objectives, Policies, and Rules of the TTPP that address development within the Franz Josef Glacier/Ka Roimata o Hinehukatere Valley and without derogating from the breadth of the submissions scope, specifically have concern with the following: Outstanding Natural Features (ONF16).	Not stated
Sky Reekie (S136)	S136.001	General Rural Zone	GRUZ - R12	Oppose	The permitted activity under this rule (mineral extraction of up to 20,000m <sup>3</sup> a year per property and 3ha at any one time) provides inadequate control where large-scale sand mining is	Remove GRUZ R12 and make Mineral extraction a restricted discretionary activity in Rural Zones.

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					proposed on several adjacent land parcels as is the case on the Barrytown Flats. GRUZ-R12 would permit large-scale sand mining on several properties on the Barrytown Flats, with cumulative effects on traffic (10 heavy vehicle truck movements per day per property), dust, noise, light pollution, amenity values, wildlife disturbance and potentially other unanticipated effects. GRUZ-R12 is therefore not fit for purpose and needs to be removed. Mineral extraction should be regarded as a Restricted Discretionary or Discretionary activity (GRUZ - R25) in areas such as the Barrytown Flats with a mix of Rural Lifestyle and General Rural Zones, thereby allowing for appropriate levels of community consultation and adequate oversight of the consenting of mineral extraction operations.	
Snodgrass Road submitters (S619)	S619.001	Planning Maps and Overlays	General Rural Zone	Support	The zoning accurately reflects the existing and intended use of the properties.	Retain proposed zoning of the Snodgrass Road properties
Snodgrass Road submitters (S619)	S619.002	Planning Maps and Overlays	Settlement Zone	Support	The zoning accurately reflects the existing and intended use of the properties.	Retain proposed zoning of the Snodgrass Road properties
Snodgrass Road submitters (S619)	S619.003	Natural Hazards	Flood Severe Overlay and Flood Susceptibility Overlay	Oppose	Seek that the flood hazard zoning be removed from their properties	Remove Westport Flood Hazard zoning
Snodgrass Road submitters (S619)	S619.004	Natural Hazards	Flood Severe Overlay and Flood Susceptibility Overlay	Oppose	It is unclear why this area is subject to this overlay. 2/75 Snodgrass Road	That the Flood Hazard Susceptibility Overlay be removed in its entirety from this property
Snodgrass Road submitters (S619)	S619.005	Natural Hazards	Coastal Severe and Coastal Alert Overlay	Oppose	It is unclear why this area is subject to this overlay. 2/75 Snodgrass Road	That the Coastal Hazard Alert Level Overlay be removed in its entirety from this property.

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Snodgrass Road submitters (S619)	S619.006	Natural Hazards	Coastal Severe and Coastal Alert Overlay	Oppose	The Coastal Environment Overlay appears to have been applied in a unsophisticated manner on these properties	That the Coastal Environment Overlay be removed from these properties.
Snodgrass Road submitters (S619)	S619.007	Planning Maps and Overlays	Coastal Environment	Support	The Coastal Environment Overlay does not apply to these properties.	Retain as notified
Snodgrass Road submitters (S619)	S619.008	STRATEGIC DIRECTION	UFD - O1	Support	supported as it applies to managing the risk of natural hazards and development.	Retain Objective UFD-01.
Snodgrass Road submitters (S619)	S619.009	Natural Hazards	Natural Hazards Objectives	Amend	The objectives be amended for site-specific circumstances of their properties	Amend for site-specific allowance such that the site specific circumstances of their properties can be accommodated as per the submission on policies and rules below.
Snodgrass Road submitters (S619)	S619.010	Natural Hazards	Natural Hazards Policies	Amend	The policies for natural hazards are supported subject to the amendments specified for Policy NH--P13 specified below.	Retain Policies NH-P1 - NHP13 subject to the specific amendments to Policy NH-P13 set out in the submission below.
Snodgrass Road submitters (S619)	S619.011	Natural Hazards	NHP13	Amend	Seek explicit policy direction that subdivision, use and development on their properties also be allowed in circumstances where rules not met	Include additional provisions in Policy NH-P13 insofar as they apply to the Snodgrass Road submitters properties, which direct that <b>...subdivision, use and development on Snodgrass Road properties be allowed in circumstances where the specified minimum floor levels are not achieved but:</b> <b>a. It involves:</b> i. Construction of buildings which do not house people; or ii. Reconstruction of existing dwellings which are damaged or destroyed; or iii. The extension of the floor area of a dwelling by 25 - 50 m <sup>2</sup> over any continuous 10 year period without meeting the finished floor area standards set out above (the intent being to allow for addition of a bedroom or similar); or b. It includes: i. Mitigation measures avoid risk to life and minimise risk to property and the environment; and ii. The risk to adjacent properties, activities and people is not increased as a result of

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						<b>the activity proceeding.</b>
Snodgrass Road submitters (S619)	S619.012	Natural Hazards	NHR1	Amend	Not practical to reconstruct or replace a damaged home within a 2 year timeframe.	Amend Rule NH-R1 so reconstruction and Replacement of Lawfully Established Buildings in the Westport Hazard Overlay is permitted within a <b>5 year</b> timeframe.
Snodgrass Road submitters (S619)	S619.013	Natural Hazards	NHR2	Support	Repair and maintenance of any mitigation structure which protects a property or properties can occur without the need for a resource consent	Retain Rule NH-R2.
Snodgrass Road submitters (S619)	S619.014	Natural Hazards	NHR3	Support	It is important that upgrade of any mitigation structure can occur without the need for a resource consent	Retain Rule NH-R3.
Snodgrass Road submitters (S619)	S619.015	Natural Hazards	NHR4	Support	It is appropriate that new mitigation structures constructed to protect a property or properties in Snodgrass Road without the need for a resource consent	Retain Rule NH-R4.
Snodgrass Road submitters (S619)	S619.016	Natural Hazards	NHR5	Support	Discretionary activity status is appropriate for any natural hazard mitigation structure which does not meet permitted activity rules.	Retain Rule NH-R5.
Snodgrass Road submitters (S619)	S619.017	Natural Hazards	NHR6	Support	This rule applies to 2/75 Snodgrass Road (front building). It is important the Proposed Plan permit the repair and maintenance of this building.	Retain Rule NH-R6.
Snodgrass Road submitters (S619)	S619.018	Natural Hazards	NHR7	Support	There is no reason to limit the establishment of new unoccupied buildings in these overlays.	Retain Rule NH-R7.
Snodgrass Road submitters (S619)	S619.019	Natural Hazards	NHR10	Amend	Allow the floor area of a dwelling in the Snodgrass Road properties to be extended by 25 - 50 m <sup>2</sup> over any continuous 10-year period without meeting the finished floor area standards.	Amend Rule NH-R10 to allow the floor area of a dwelling in the Snodgrass Road submitters' properties to be extended by 25 - 50 m <sup>2</sup> over any continuous 10-year period without meeting the finished floor area standards set out in Rule NH-R10(1).

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Snodgrass Road submitters (S619)	S619.020	Natural Hazards	NHR13	Support	It is important the Proposed Plan allow a resource consent application be made for an activity which does not meet permitted activity rules.	Retain provision
Snodgrass Road submitters (S619)	S619.021	Natural Hazards	NHR38	Amend	History has shown that it is not practical to reconstruct or replace a damaged home within a 2-year timeframe.	Amend Rule NH-R38 so reconstruction and Replacement of Lawfully Established Buildings in the Coastal Alert Overlay is permitted within a 5-year timeframe.
Snodgrass Road submitters (S619)	S619.022	Natural Hazards	NHR39	Support	There is no reason to limit the establishment of new unoccupied buildings in these overlays.	Retain Rule NH-R39.
Snodgrass Road submitters (S619)	S619.023	Natural Hazards	NHR41	Amend	The permitted activity rule should allow the floor area of a dwelling in the Snodgrass Road submitters' properties to be extended by 25 - 50 m <sup>2</sup> over any continuous 10-year period.	Amend Rule NH-R41(1) to allow the floor area of a dwelling in the Snodgrass Road submitters' properties to be extended by 25 - 50 m <sup>2</sup> over any continuous 10-year period.
Snodgrass Road submitters (S619)	S619.024	Natural Hazards	NHR43	Support	Allow a resource consent application to be made for an activity which does not meet permitted activity rules.	Retain Rule NH-R43.
Snodgrass Road submitters (S619)	S619.025	Natural Hazards	NHR47	Support	There is no reason to restrict buildings in this overlay beyond those used for Critical Response Facilities	Retain provision.
Snodgrass Road submitters (S619)	S619.026	Natural Hazards	NHR48	Support	There is no reason to restrict buildings in this overlay beyond those used for Critical Response Facilities.	Retain provision.
Snodgrass Road submitters (S619)	S619.027	Natural Hazards	NHR49	Support	There is no reason to restrict buildings in this overlay beyond those used for Critical Response Facilities.	Retain provision.
Snodgrass Road submitters (S619)	S619.028	Natural Hazards	NHR52	Amend	Allow the floor area of a dwelling in the Snodgrass Road submitters' properties to be extended by 25 - 50 m <sup>2</sup> over any continuous 10-year period	Amend Rule NH-R52 to allow the floor area of a dwelling in the Snodgrass Road properties to be extended by 25 - 50 m <sup>2</sup> over any continuous 10 year period without meeting the finished floor area standards set out in Rule NH-R52.
Snodgrass Road submitters (S619)	S619.029	Natural Hazards	NHR53	Support	Allows a resource consent application to be made	Retain Rule NH-R53.

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Snodgrass Road submitters (S619)	S619.030	Ecosystems and Indigenous Biodiversity	ECO - R1	Support	Unclear whether a vegetation clearance activity needs to be a named activity under (3)	Amend Rule ECO-R1 to the extent necessary to permit miscellaneous indigenous vegetation clearance of up to 5,000 m <sup>2</sup> per site on the Snodgrass Road submitters properties over any continuous 3-year period
Snodgrass Road submitters (S619)	S619.031	Ecosystems and Indigenous Biodiversity	ECO - R2	Amend	It is important that the rule permit miscellaneous clearance on the Snodgrass Road submitters' properties	Amend Rule ECO-R1 to the extent necessary to permit miscellaneous indigenous vegetation clearance of up to 5,000 m <sup>2</sup> per site on the Snodgrass Road submitters properties over any continuous 3-year period.
Snodgrass Road submitters (S619)	S619.032	Ecosystems and Indigenous Biodiversity	ECO - R5	Support	Resource consent application be made for an activity which does not meet permitted activity rules.	Retain Rule ECO-R5.
Snodgrass Road submitters (S619)	S619.033	Subdivision	Subdivision Objectives	Support	Subdivision are supported subject to the amendments specified for Policy UB-P6 specified below.	Retain Objectives SUB-01 - SUBO6 and Policies SUB-P1 - SUB P9 subject to the specific amendments to SUB P6 and set out in the submission below.
Snodgrass Road submitters (S619)	S619.034	Subdivision	Subdivision Policies	Amend	Supported subject to the amendments specified for Policy UB-P6 specified below.	Retain Objectives SUB-01 - SUBO6 and Policies SUB-P1 - SUB P9 subject to the specific amendments to SUB P6 and set out in the submission below.
Snodgrass Road submitters (S619)	S619.035	Subdivision	SUB - P6	Amend	Policy UB-P6(f) undermines that policy direction	Delete Policy SUB-P6(f).
Snodgrass Road submitters (S619)	S619.036	Subdivision	SUB - R20	Support	Discretionary activity status is considered appropriate	Retain Rule UB-R20 and discretionary activity status for subdivision of the Snodgrass Road submitters properties.
Snodgrass Road submitters (S619)	S619.037	Subdivision	Subdivision Standards	Support	The subdivision standards are supported	Retain the subdivision standards in Rule SUB-S1 - SUBS11.
Snodgrass Road submitters (S619)	S619.038	Coastal Environment	CE - O1	Support	It is important the plan seek appropriate use and development of the coastal environment	Retain provision.



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Snodgrass Road submitters (S619)	S619.039	Coastal Environment	CE - O3	Support	It is important the provision acknowledge that in places flood protection work will be required	Retain provision
Snodgrass Road submitters (S619)	S619.040	Coastal Environment	CE - P1	Oppose	It is unclear why these elements have been selected to define the coastal environment.	Delete Policy CE-P1 or remove Coastal Environment overlay from the Snodgrass Road submitters' properties.
Snodgrass Road submitters (S619)	S619.041	Coastal Environment	CE - P3	Support	Policy is consistent with the requirements of the New Zealand Coastal Policy Statement 2010.	Retain Policy CE-P3.
Snodgrass Road submitters (S619)	S619.042	Coastal Environment	CE - P5	Support	It is important that the provisions provide for use and development in these areas, which include Snodgrass Road.	Retain Policy CE-P5
Snodgrass Road submitters (S619)	S619.043	Coastal Environment	CE - P6	Support	It is important that the provisions provide for use and development in these areas, which include Snodgrass Road.	Retain Policy CE-P6
Snodgrass Road submitters (S619)	S619.044	Coastal Environment	CE - P7	Support	It is important that the provisions acknowledge the practical requirements of flood protection works.	Retain Policy CE-P7
Snodgrass Road submitters (S619)	S619.045	Coastal Environment	Coastal Environment Rules	Amend	The rules for the Coastal Environment are supported subject to the amendments specified for Rule CE-R4 and CE-R12 specified below.	Retain Rules CE-R1 - CE-R22 subject to the specific amendments to Rule CE-R4 and CE-R12 set out in the submission below.
Snodgrass Road submitters (S619)	S619.046	Coastal Environment	CE - R4	Oppose	There is no reason to restrict the ground floor area and height of new and replacement buildings	Remove restriction on ground floor area and height of new and replacement buildings in Rule CE-R4(2)(i) and (ii) insofar as they apply to the Snodgrass Road submitters properties
Snodgrass Road submitters (S619)	S619.047	Coastal Environment	CE - R12	Amend	There is no consideration in Rule CE-R12 of potential effects the works could have in terms of exacerbating the flooding experienced in other areas not protected by the works	Include an additional matter of control on Rule CE-R12: <b>h. Effects on the flood hazard at properties not protected by the works.</b>
Snodgrass Road submitters (S619)	S619.048	Earthworks	Earthworks Objectives	Support	The earthworks objectives and policies are supported	Retain Objective EW-O1 and Policies EW P1 - P4

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Snodgrass Road submitters (S619)	S619.049	Earthworks	Earthworks Policies	Support	The earthworks objectives and policies are supported insofar as they apply to the Snodgrass Road submitters' properties.	Retain Objective EW-O1 and Policies EW P1 - P4
Snodgrass Road submitters (S619)	S619.050	Earthworks	EarthworksRules	Amend	The earthworks rules are supported insofar as they apply to the Snodgrass Road submitters' properties subject to the changes sought to EW-R1 and EW-R2.	Retain Rules EW-R1 to EW-R8 subject to the changes sought to EW-R1 and EW-R2 below.
Snodgrass Road submitters (S619)	S619.051	Earthworks	EW - R1	Amend	The purpose of flood hazard protection works is to divert overland flow and it will be impossible to demonstrate that some of the diverted water will not end up on a neighbouring property.	Exempt earthworks for flood hazard protection works from needing to comply with Rule EW-R1(4).
Snodgrass Road submitters (S619)	S619.052	Earthworks	EW - R2	Amend	There is also no rationale provided as to why natural hazard mitigation structures work constructed by a third party cannot be a permitted activity	Remove the requirement in Rule EW-R2(g) for natural hazard mitigation structures to be constructed by a statutory agency or authorized contractor.
Snodgrass Road submitters (S619)	S619.053	Rural Zones	Rural Zones - Objectives and Policies	Amend	New policy which is specific to the Snodgrass Road submitters properties	New policy which is specific to the Snodgrass Road submitters properties which: <b>a. Directs that the continued reasonable use and development of the properties be provided for in this area;</b> <b>b. Directs that the establishment of natural hazard mitigation works be provided for in this area, including dwellings with raised flooring and bunding; and</b> <b>c. Acknowledges that this type of natural hazard mitigation work forms part of the anticipated rural character of the area.</b>
Snodgrass Road submitters (S619)	S619.054	General Rural Zone	GRUZ	Support	The rules which apply to the Settlement Zone, Rural Lifestyle Zone and General Rural Zone area supported.	Retain Rural General Zone Rules GRUZ R1 - GRUZ R35. Retain Settlement Zone Rules.
Snodgrass Road submitters (S619)	S619.055	Natural Hazards	Flood Severe Overlay and Flood	Amend	The objectives, policies and rules which apply to these properties be amended	Amend

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			Susceptibility Overlay			
Snodgrass Road submitters (S619)	S619.056	Natural Hazards	Coastal Severe and Coastal Alert Overlay	Oppose	The associated restrictions on land use are unjustified on these properties.	Amend rules to remove restrictions on these properties
Snodgrass Road submitters (S619)	S619.057	Coastal Environment	CE - R4	Amend	There is also no rationale provided as to why natural hazard mitigation structures constructed by a third party cannot permitted	Remove the requirement in Rule CE R4(2 (c) for natural hazard mitigation structures to be constructed by a statutory agency or authorized contractor.
Snodgrass Road submitters (S619)	S619.058	Natural Hazards	NHR52	Amend	Not sufficient justification as to why 1m of sea level rise needs to be accommodated by finished floor levels	Delete reference to 1m sea level rise from Rule NH-R52 insofar as it applies to the Snodgrass Road properties
Snodgrass Road submitters (S619)	S619.059	Rural Zones	Rural Zones - Objectives and Policies	Support	Retain Objective EW-O1 and Policies EW P1 - P4	retain
SOPHIA ALLAN (S82)	S82.001	Appendix One: Transport Performance Standards	TRNS14	Amend	There can be a significant conflict between heavy transport values and other uses of the same road such as tourism. Heavy transport can impact on tourism businesses. For example the Coast Highway is one of the "great Drives of the World" according to Lonely Planet.	There should be a daily maximum volume of truck movements established, not just for each mine application but for all heavy industry transportation. This should apply not only where the activity is taking place but should take into account the cumulative effects of all mines or heavy industry trucking to and from source and destination. For example to and from Greymouth and Westport ports, quarries, mines, dairy etc The allowable movements of heavy trucks should be between 11pm and 6am (as currently for milk tankers).
SOPHIA ALLAN (S82)	S82.002	Planning Maps and Overlays	Rezoning Requests	Amend	MINZ do not apply to the Barrytown Flats 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. Therefore they cannot be zoned as a Mineral Extraction Zone.	I do not support the designated Mineral Extraction Zone on the Barrytown Flats. It needs to be changed to General Rural Zone in keeping with the rest of the agricultural land on the Flats.

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					<p>The piece of land the MINZ is proposed to cover on the Barrtown Flats doesn't actually have a lot of mineral value contained within it.</p> <p>The concern is that the MINZ is proposed to facilitate further heavy mineral processing on the site.</p> <p>The company has hinted in its resource consent application that it would like to refine its processing techniques which could involve heavy chemical processing at this MINZ site.</p> <p>If the MINZ is granted this could give them the power to do so without any community or environmental input.</p>	
SOPHIA ALLAN (S82)	S82.003	Mineral Extraction Zone	MINZ	Oppose		Do not apply MINZ anywhere on the West Coast
SOPHIA ALLAN (S82)	S82.004	General Rural Zone	GRUZ - R25	Amend	<p>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.</p> <p>This should include provision for maximum cumulative local transport movements, noise, dust, lighting effects and effects on local wildlife and waterways. GRUZ-R25 as it stands will allow mining companies to mine multiple land parcels simultaneously without any resource consent.</p>	Amend the rule to take account of potential cumulative effects of multiple mining operations in the same locality as proposed on the Barrytown Flats
SOPHIA ALLAN (S82)	S82.005	General Rural Zone	GRUZ - R18	Oppose	<p>This rule only applies to previously mined locations active since 2002 and listed in Schedule 10. Schedule 10 is empty, making GRUZ R18 irrelevant. Therefore this rule should be removed.</p> <p>All proposed mineral extraction</p>	Remove GRUZ R18

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					activities in General Rural Zones should be considered Restricted Discretionary or Discretionary (GRUZ R25).	
SOPHIA ALLAN (S82)	S82.006	General Rural Zone	GRUZ - R12	Oppose	<p>The permitted activity under this rule (mineral extraction of up to 20,000m<sup>3</sup> 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. For example one company TIGA Minerals and Metals Ltd., has two exploration licenses covering 797ha and a mining licence covering 800ha of the Barrytown Flats. They have a declared aim of mining the whole of the Barrytown Flats. GRUZ-R12 would permit large-scale sand mining on several properties on the Barrytown Flats, with cumulative effects on traffic (10 heavy vehicle truck movements per day per property), dust, noise, light pollution, amenity values, wildlife disturbance and potentially other unanticipated effects.</p> <p>GRUZ-R12 is therefore not fit for purpose and needs to be removed. Mineral extraction should be regarded as a Restricted Discretionary or Discretionary activity (GRUZ - R25) in areas such as the Barrytown Flats with a mix of Rural Lifestyle and General Rural Zones, thereby allowing for appropriate levels of community consultation and adequate oversight of the consenting of mineral extraction operations.</p>	Remove GRUZ R12 and make Mineral extraction a restricted discretionary activity in Rural Zones.

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SOPHIA ALLAN (S82)	S82.007	General Rural Zone	GRUZ - R25	Oppose	Extensive MINZ mining is not an expected and ongoing activity in some rural areas so reverse sensitivity should not apply. For example our rural environment has never been mined as extensively as the proposed TIGGER mining application. We support the role tourism plays in our rural environment and we don't see how a major mining development can co exist along side our tourism industry.	More protection for existing communities and businesses.
SOPHIA ALLAN (S82)	S82.008	Rural Zones	RURZ - P4	Support		We support low traffic and moderate noise levels. We also support setbacks from property boundries
SOPHIA ALLAN (S82)	S82.009	Rural Zones	RURZ - P5	Support		support
SOPHIA ALLAN (S82)	S82.010	Rural Zones	RURZ - P7	Support		support
SOPHIA ALLAN (S82)	S82.011	Rural Zones	RURZ - P9	Support		Support
SOPHIA ALLAN (S82)	S82.012	Rural Zones	RURZ - P10	Support		Support
SOPHIA ALLAN (S82)	S82.013	Rural Zones	RURZ - P11	Support		Support
SOPHIA ALLAN (S82)	S82.014	Rural Zones	RURZ - P12	Support		Support
SOPHIA ALLAN (S82)	S82.015	Rural Zones	RURZ - P13	Support		Support
SOPHIA ALLAN (S82)	S82.016	Rural Zones	RURZ - P14	Support		Support
SOPHIA ALLAN (S82)	S82.017	Rural Zones	RURZ - P15	Support		Support

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SOPHIA ALLAN (S82)	S82.018	Rural Zones	RURZ - P19	Oppose	This rule creates a reverse sensitivity where once a mine or other large scale activity is established other activities may be restricted ie tourism and accommodation	Limit noise, dust, traffic, and activities associated with heavy industry that is out of keeping and character in our rural areas.
SOPHIA ALLAN (S82)	S82.019	Rural Zones	RURZ - P21	Amend	Because otherwise its death to the native environment by a thousand cuts.	Rehabilitation of land should be to its original state be that native bush or farmland
SOPHIA ALLAN (S82)	S82.020	Rural Zones	RURZ - P22	Amend		Rehabilitation of land should be to its original state be that native bush or farmland
SOPHIA ALLAN (S82)	S82.021	Rural Zones	RURZ - P23	Support		support
SOPHIA ALLAN (S82)	S82.022	Rural Zones	RURZ - P24	Oppose	MINZ offers no protection to existing communities and businesses.	amend to more protection for our communities. Get rid of MINZ
SOPHIA ALLAN (S82)	S82.023	Rural Zones	RURZ - P25	Amend		we would like to see more independent surveying of water quality noise levels, flora and fauna etc as mining companies and councils don't always have the expertise and will to evaluate these conditions correctly. For example the woefully lacking BJV mining application on the Barrytown flats was rejected by commissioners for lack of information and research. It was left to anyone opposing the application to prove what was here to protect. Critically endangered birds, water quality etc.
SOPHIA ALLAN (S82)	S82.024	Rural Zones	SETZ - PREC3- P3	Support		Support
SOPHIA ALLAN (S82)	S82.025	Rural Zones	SETZ - PREC4 - P4	Support		Support
SOPHIA ALLAN (S82)	S82.026	Rural Zones	GRUZ - PREC 5 - Highly Productive Land Precinct Policy	Support	It creates instant settlements which are out of keeping with our rural environments and stresses our limited info structure.	General rural land should not be subdivided down to less than 50 acres

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					It also cuts up our productive rural farming land.	
SOPHIA ALLAN (S82)	S82.027	Rural Lifestyle Zone	RLZ - R4	Oppose	We don't believe reverse sensitivity should exist, for example for huge mining operations that have never been a feature in our rural areas previously	We want far more protection for our communities.
SOPHIA ALLAN (S82)	S82.028	Rural Lifestyle Zone	RLZ - R3	Oppose	It seems the rules now are for residents to protect themselves from new obtrusive noise levels rather than have appropriate level control at source	More protection for existing communities from heavy industry moving in.
SOPHIA ALLAN (S82)	S82.029	Rural Lifestyle Zone	RLZ - R8	Support		support
SOPHIA ALLAN (S82)	S82.030	Rural Lifestyle Zone	RLZ - R15	Oppose	It would seem that the point of the the TPP is to make mining permitted with less restrictions and protections for our communities. We are mostly all employed already in sustainable jobs. There's more to life than extractive industry.	More protection for the local people.
SOPHIA ALLAN (S82)	S82.031	Rural Lifestyle Zone	RLZ - R11	Amend	Because it would be incredibly unfair to allow residential development, subdivisions, lifestyle blocks etc, and then encroach upon their environment and character with heavy industry.	There should be setbacks for any mining operation of at least 300 meters from any legal dwelling
Spark NZ Trading Ltd, Vodafone NZ Ltd, Chorus NZ Ltd (S541)	S541.001	Subdivision	SUB - S8	Amend	We believe that there is the opportunity to amend SUB-S8 Telecommunications to be more specific about the type of telecommunication network connectivity generally expected for subdivisions. Within urban and semi-urban i.e., rural residential/settlements fibre connectivity should be a realistic option due to the ultra- fibre broadband (UFB) initiatives delivered in partnership via Crown Infrastructure Partners and Chorus. In rural environments wireless/mobile connectivity is the norm as promoted via the Rural Broadband Initiative (RBI).	<b>Amend as follows: SUB-S8 Telecommunications1. Provision shall be made for telecommunications connections to an open access fibre network to the boundary of each new lot for all new allotments in the following zones:a) all CMUZ - Commercial and Mixed Use Zonesb) all INZ - Industrial Zonesc) all RESZ - Residential Zonesd) RLZ - Rural Lifestyle Zonee) SETZ - Settlement Zonef) SVZ - Scenic Visitor Zone2. For all other zones the applicant shall provide written confirmation from a telecommunication network operator confirming that a telecommunications connection (fibre,</b>



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						<p><b>mobile or wireless including satellite) can be provided to all new allotments and describing how this can be achieved.</b></p> <p>3. At the time of subdivision, sufficient land for telecommunications, transformers and any associated ancillary services must be set aside. For a subdivision that creates more than 15 lots, consultation with telecommunications network utility operators <b>will</b> be required.</p> <p>4. All necessary easements for the protection of telecommunications network utility services must be duly granted and reserved.</p>
Springcreek Forestry (S52)	S52.001	SCHED4 - SCHEDULE OF SIGNIFICANT NATURAL AREAS	SCHED4 - SCHEDULE OF SIGNIFICANT NATURAL AREAS	Oppose	The land under SNA is pasture land already developed and some forestry area.	Remove the area legal desc: PT RS 6357 from SNA
Stephen Page (S270)	S270.001	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori	Oppose	Use the existing judicial system to identify sites and areas of significance to Māori.	I wish the Council and Poutini Ngai Tahu to utilise the Maori Land Courts and the principles of the Treaty of Waitangi in order to obtain authority over the Sites and Areas of Significance to Maori that have been identified in the proposed TTPP.
Stephen Page (S270)	S270.002	Settlement Zone	SETZ - R1	Amend	<p>This proposal intends to forbid ratepayers from collecting and consuming rainwater. The fact that human beings have been able to freely consume rainwater since the dawn of mankind makes this proposal a fundamental breach of our human rights.</p> <p>The proposed compulsion for owners of residential units to connect to the network utility operator for provision of</p>	<p>Delete requirement for connections to 3 waters network utility operator services where these are provided. Amend the rule as follows</p> <p>2. Where the settlement is serviced by a network utility operator for wastewater, water supply or stormwater all residential units and buildings used for a residential activity <del>must</del> <b>can</b> be connected to the community wastewater, water supply and stormwater infrastructure, <i>if they so wish. The services of the network utility operator will</i></p>

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					<p>all the 3 waters or be required to treat that water supply in accordance with NZ4404:2010, is a breach of their right to choose how they source their water from their own land.</p> <p>Since we ratepayers are the current owners (through the council) of the infrastructure that provides our community with drinking water, we should have the right to choose whether we wish to partake of it or not.</p>	<p><i>beretained and paid for by the ratepaying residents of the settlements regardless of whether they connect to the services offered by the network utility operator or not.</i> <b>(i) Ratepaying residents cannot therefore expect a rate rebate if they choose not to connect to the services offered by the network utility operator.</b></p> <p>3. Where the settlement is not serviced by a network utility operator for wastewater, <del>water supply</del> or stormwater, <del>onsite collection, treatment and disposal</del> must be undertaken in accordance with NZS4404:2010 Land Development and Subdivision Infrastructure or the relevant Council Engineering Technical Standards." <i>The Standard encourages sustainable development and modern design. It therefore should promote the efficient collection of rainwater or ground water using sustainable and non-toxic materials which are safe for people and the environment.</i></p> <p><b>(i) The disposal of waste and stormwater must comply with the standard and therefore not cause pollution to the local environment or endanger any persons or property within neighbouring residential settlements.</b></p>
Stephen Page (S270)	S270.003	Signs	SIGN - R13	Oppose	Discretion should be applied in this instance rather than a blanket rule which does not take into account differing circumstances for businesses.	If the landowner has been granted permission for signage to be displayed that is not related to that property, then this agreement between the land owner(s) and/or business owner(s) should be honoured even if it is not on an adjoining site.
Stephen Page (S270)	S270.004	Signs	SIGN - P6	Oppose in part	The proposed size of the lettering is excessive at the same time as restricting words and symbols. This limits business names hugely if the	Reduce the minimum size of lettering.

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					signs need to include all the other business and directional information. Please reconsider this, not least on purely practical grounds.	
Stephen Page (S270)	S270.005	Planning Maps and Overlays	Rezoning Requests	Oppose	<p>The proposed Kumara Mineral Extraction Zone is ultra vires, and the TTPP Committee has inappropriately used its legal power or authority as this does not meet Part 2 of the RMA. The rezoning of this land has not been subject to a RMA effect based assessment and the land does not contain a "legally established activity" to support the zone.</p> <p>A minerals permit is not an instrument that addresses land use effects (the Crown Minerals Act 1991 only regulates the allocation of access to minerals) - . Whilst it is good sense to avoid duplication of regulation, the West Coast Regional Council (WCRC) will still require mining activity to obtain resource consent. It will then regulate air quality, water quality and quantity and soil conservation effects. It will not regulate land use effects such as location of infrastructure, noise, hours of operation and lighting.</p> <p>The physical environment will be considered in a WCRC consent, but not the effects on the social needs and well-being of nearby people. Without appropriate regulation through the TTPP, these effects will be ignored.</p> <p>Appropriate land use rules and/or separation buffers are adopted in New Zealand District Plans because mineral extraction is a noisy and messy industrial activity.</p>	Rezone the Kumara Mineral Extraction Zone. Consider sensible zoning using effects-based criteria to be included in this TTPP, so that mining activity can occur in areas without detriment to neighbours or communities.

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					<p>Gold mining involves heavy machinery, security and lighting infrastructure, disturbance of large areas of land, large pits, stockpiles, settling ponds, storage of hazardous substances, use of local water and long hours of operation. These elements require management and often require compliance monitoring in order to ensure compliance.</p> <p>The effects of the activity are not compatible with sensitive uses such as residential settlements.</p> <p>1.10 I submit that the proposed TTPP does not -</p> <ul style="list-style-type: none"> <li>• Fulfil councils responsibility to provide a tool for improving local environmental management of the effect of mining activity on existing residences and settlements, or</li> <li>• Ensure mining activities won't harm neighbours or communities, or</li> <li>• Demonstrate integrated management of resources, or the concept of sustainable management which allows for development subject to environmental effects being appropriately managed, or</li> <li>• Demonstrate a clear and rigorous procedure for the setting of environmental rules, in that land use plans should first try to avoid adverse effects on the environment, before considering potential for mitigation and then considering remediation.</li> </ul> <p>2. The proposed Kumara Mineral Extraction Zone is ultra vires, and the</p>	

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					<p>TTPP Committee has inappropriately used its legal power or authority. [refer submission for more detailed information and reasons]</p> <p>The Kumara Settlement is not "new" land use. It is there already, and it is expanding. This is very relevant as this policy, rather than supporting the introduction of the new Kumara "Mining Extraction Zone", instead reinforces that the mining activity should not occur in this location because there is a sensitive activity beside it.</p> <p>(ii). The TTPP Committee have been presented with evidence that regulation of the industry, as well as separation of the industry from residential activity is what the people of the West Coast want. I submit that the TTPP Committee has inappropriately used its legal power or authority to influence the inclusion of the Kumara Mining Extraction Zone in the proposed Plan.</p> <p>The economic growth and cultural and social cohesion in Kumara is visible and measurable. We have active community groups and social and hold cultural community functions. This community is not a sleeper settlement to support nearby industrial business. Kumara is not a village that needs or depends on industrial activity to sustain its economic viability. I am proud of our past mining history, but it is no longer appropriate for mining to occur on our village boundary. Kumara has reinvented itself into a peaceful village with a diverse population and new opportunities that are in keeping with</p>	

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					the character of the current surrounding community. It is a prominent and regular stop for the famous West Coast Wilderness Trail which has brought a new range of visitors from all around New Zealand and abroad to stay.	
Stephen Page (S270)	S270.006	Sites and Areas of Significance to Māori	SASM - O2	Oppose	Why should Poutini Ngai Tahu be granted such power over these sites and areas based on their own definitions of what constitutes cultural value? These sites and areas were never before considered or identified as SASMs by Poutini Ngai Tahu until central government directed councils to do likewise.	Couldn't the access, maintenance and use of these SASM's be decided by the Maori Land Courts and thus prevent another layer of expensive bureaucracy being imposed on property owners?
Stephen Page (S270)	S270.007	Sites and Areas of Significance to Māori	SASM - O3	Oppose	SASM - O3 Does Poutini Ngai Tahu define what is 'inappropriate'? Will landowners be permitted to challenge these definitions in court?	Ensure landowners can challenge Poutini Ngāi Tahu definitions of "inappropriate" activities.
Stephen Page (S270)	S270.008	Sites and Areas of Significance to Māori	SASM - P2	Oppose	SASM - P2 . Does Poutini Ngai Tahu wish to search and locate more than the 216 SASMs they have already identified in this proposed TTPP?	Clarify process for identification of any further SASM.
Stephen Page (S270)	S270.009	Sites and Areas of Significance to Māori	SASM - P3	Oppose	SASM - P3 Wouldn't the police be called first in the event of the accidental discovery of skeletal remains? I thought that they would have primary responsibility for deciding what happened to any human remains that were discovered?	Amend to reflect that contacting the police should be the first activity in relation to discovery of human remains.
Stephen Page (S270)	S270.010	Sites and Areas of Significance to Māori	SASM - P4	Oppose	SASM - P4 What would happen in the event that informal arrangements or understandings were unable to be achieved? Could the courts become involved in order to enforce a 'formal arrangement' between landowners and Poutini Ngai Tahu, and if so who would	Clarify process if informal arrangements under this policy are unable to be achieved.

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					be liable for the costs of such legal action?	
Stephen Page (S270)	S270.011	Sites and Areas of Significance to Māori	SASM - P7	Oppose	SASM - P7 Who defines what an 'inappropriate activity' is? What exactly are these values, interests and associations? If they are challenged by landowners will they be permitted to do so in a court of law?	Clarify what is an "inappropriate activity" and what are the values, interests and associations referred to in this policy.
Stephen Page (S270)	S270.012	Sites and Areas of Significance to Māori	SASM - P13	Oppose	SASM - P13 Does this mean that an identified SASM covering a private property could prevent the landowner from altering, demolishing or removing a building or structure that they had themselves erected? Does that mean that Poutini Ngai Tahu have rights to the food that is growing or being farmed by the landowner? What are those identified values?	Clarify what rights to access to private property exists with SASM and what values are identified in relation to this policy.
Stephen Page (S270)	S270.013	Sites and Areas of Significance to Māori	SASM - P14	Oppose	SASM - P14 How much land is sufficient?  What size is suitable? Will the courts decide? and What kind of measures will be taken? When and how is access allowed and who decides?	Clarify what sufficient land, size and measures that might arise from this policy and how access to private land could occur.
Stephen Page (S270)	S270.014	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori Rules	Oppose	The above SASM rules are stated within the proposed TTPP to have 'legal effect'. This apparent claim is made under the authority of the Resource Management Act (RMA). The private property owners whose land falls within one of the 216 SASMs covered by these rules, have been given no opportunity to 'Participate' in their formulation, nor been offered any 'Protection' of their ownership rights and this is considered to breach all 3 principles of the Treaty of Waitangi.	Do not have rule have legal effect.

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Stephen Page (S270)	S270.015	Sites and Areas of Significance to Māori	Permitted Activities	Oppose	Of the 216 SASM's identified in Schedule Three, I have counted at least 88 that fall under one of the 4 designated categories highlighted above. The property owners of any one of these SASM's will be required to obtain written approval from Poutini Ngai Tahu and the confirmation of this approval must then be submitted to the council at least 10 days prior to the activity commencing. I am also concerned that the process for obtaining these written approvals will come at a cost to landowners who might be charged by Poutini Ngai Tahu for the administrative costs involved? Is the committee able to state categorically that all potential costs under this scheme will be covered by the council's existing budget?	Clarify how written approvals for these rules will be administered and whether these costs will be covered by the Council.
Stephen Page (S270)	S270.016	SCHED 3: SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	Oppose	There are 216 proposed SASMs identified in the TTPP document. The overview explanation of these sites and areas of significance to Maori does not align with the descriptions in Schedule 3 nor does the schedule state any indication of their specific location within any of the SASM's. What would be the effect on the property values of those that are designated as SASM's? The extra 'due diligence' required by agents and lawyers may well be onerous and incur added expense for those wishing to buy or sell property on SASM's.	Provide more explanation of the cultural values of SASM sites to explain their relevance and whether they have evidence of their prior existence,. Clarify what "Ancestors embedded in the landscape" actually means.
Stephen Page (S270)	S270.017	General Rural Zone	GRUZ - R12	Oppose	( It is possible for the TTPP to provide for mining on the West Coast, in a manner that avoids adverse effects on other land use. However the framework	I propose that the provisions that relate to mineral extraction be rewritten, so that TTPP identifies how mining activity will be managed to ensure that mining activity does not harm



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					<p>in the proposed plan fails to do this. The Plan proposes that mining be managed in any Rural zone as a "permitted activity", with overlay rules. 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 starting point in the proposed TTPP for Mineral Extraction makes a mockery of the environmental effects based approach that New Zealand has adopted.</p> <p>In the Permitted rule itself there is no attempt to avoid adverse effects on adjoining or nearby parties. The criteria relate primarily to the site itself.</p> <p>Hours of operation have increased from current plan provisions. Blasting and vibration is permitted to occur from 7am to 10 pm.</p> <p>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.</p> <p>A resource consent application must be accompanied by an assessment of effects on the environment in such detail as corresponds with the scale and significance of the effects that the activity may have on the environment.</p>	neighbours and communities.

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Stephen Page (S270)	S270.018	Glossary	Glossary	Amend	There are multiple terms in the SASM provisions that are not included in the glossary	Ensure all Maori terms used in the plan are defined.
Stephen Page (S270)	S270.019	Sites and Areas of Significance to Māori	SASM - O1	Oppose	As a none Te Reo speaker, why am I obliged to search for translations in order to discover Poutini Ngai Tahu's objectives under the proposed SASMs?	Objective to be written entirely in English
Stephen Page (S270)	S270.020	Sites and Areas of Significance to Māori	SASM - P13	Oppose	What are those identified values?	Clarify identified values in relation to this policy.
Stephen Page (S270)	S270.021	Sites and Areas of Significance to Māori	SASM -R6	Oppose	<p>Of the 216 SASM's identified in Schedule Three, I have counted at least 88 that fall under one of the 4 designated categories highlighted above. The property owners of any one of these SASM's will be required to obtain written approval from Poutini Ngai Tahu and the confirmation of this approval must then be submitted to the council at least 10 days prior to the activity commencing.</p> <p>Since this requirement apparently has legal effect, it is not a proposal and therefore not subject to debate or any consultation and could apply to even the most minor of activities contemplated by landowners. Since the wording and language used to write the SASM rules is somewhat vague and generalised, gaining written approval could be a wholly arbitrary process by Poutini Ngai Tahu.</p>	Remove requirement for Poutini Ngai Tahu written approval.
Steve and Anne Staples (S584)	S584.001	STRATEGIC DIRECTION	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
Steve and Anne Staples (S584)	S584.002	Rural Zones	Rural Zones	Support	Providing for mineral extraction in zones	retain provisions for mineral extractions in zones

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Steve and Anne Staples (S584)	S584.003	Open Space and Recreation Zones	Open Space and Recreation Zones	Support	Providing for mineral extraction in zones	retain provisions for mineral extractions in zones
Steve and Anne Staples (S584)	S584.004	Mineral Extraction Zone	Mineral Extraction Zone	Support		Retain
Steve and Anne Staples (S584)	S584.005	Planning Maps and Overlays	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
Steve Croasdale (S516)	S516.001	Interpretation	Definitions	Amend	believe that there needs to be a clear definition for offensive industries.	Develop a suitable definition for <b>offensive industries</b> .
Steve Croasdale (S516)	S516.002	Interpretation	Definitions	Amend	I believe that there needs to be a clear definition for hazardous facilities.	Develop a suitable definition for <b>hazardous facilities</b> .
Steve Croasdale (S516)	S516.003	Interpretation	Definitions	Amend	I believe that there needs to be a clear definition for woodlot.	Develop a suitable definition for <b>woodlot</b> .
Steve Croasdale (S516)	S516.004	Interpretation	Definitions	Amend	I believe that there needs to be a clear definition for shelterbelt.	Develop a suitable definition for <b>shelterbelt</b> .
Steve Croasdale (S516)	S516.005	STRATEGIC DIRECTION	Strategic Directions Overview	Support		Retain
Steve Croasdale (S516)	S516.006	STRATEGIC DIRECTION	Agriculture Strategic Objectives	Support		Retain
Steve Croasdale (S516)	S516.007	STRATEGIC DIRECTION	Poutini Ngāi Tahu Strategic Policies	Support		Retain
Steve Croasdale (S516)	S516.008	Natural Hazards	Natural Hazards Objectives	Support		Retain
Steve Croasdale (S516)	S516.009	Natural Hazards	Natural Hazards Policies	Support		Retain
Steve Croasdale (S516)	S516.010	Natural Hazards	NHR38	Amend	Two and five years is an insufficient length of time for reconstruction/replacement.	Amend to read: Where:  1. ...  2. For reconstruction of a building lawfully established at the time of notification of the Plan where:

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						<p>a. The building has been destroyed or substantially damaged due to fire, natural disaster or Act of God;</p> <p>b. The destroyed/damaged building is reconstructed within <del>5-year</del> <b>a ten-year period</b> in the Coastal Alert overlay and <del>2-year</del> <b>a ten-year period</b> in the Coastal Severe overlay;</p> <p>c. ...</p>
Steve Croasdale (S516)	S516.011	Natural Hazards	NHR39	Support		Retain
Steve Croasdale (S516)	S516.012	Natural Hazards	NHR40	Amend	Point two in this rule is too restrictive.	Delete point 2.
Steve Croasdale (S516)	S516.013	Natural Hazards	NHR41	Amend	Activity status where compliance is not achieved is too restrictive for Coastal Hazard Alert overlay.	Amend activity status where compliance is not achieved for Coastal Hazard Alert overlay from Discretionary to Controlled or to Restricted Discretionary.
Steve Croasdale (S516)	S516.014	Natural Hazards	NHR41	Amend	Matters to which discretion is restricted should be similar to NH - R11.	<p>The matters to which discretion is restricted should be amended to similarly reflect NH - R11:</p> <p><b>a. Whether there is a functional or operational need for the facility to be located in a Coastal Severe and Coastal Alert Overlays area;</b></p> <p><b>b. The effects of natural hazards on people and property;</b></p> <p><b>c. The location and design of proposed sites, buildings, vehicle access, earthworks and infrastructure in relation to natural hazard risk;</b></p> <p><b>d. Any freeboard requirements to be included;</b></p> <p><b>e. The management of vegetation or other natural features to mitigate natural hazard risk;</b></p> <p><b>f. The timing, location, scale and nature of any earthworks in relation to natural hazard risk;</b></p> <p><b>g. The potential for the proposal to exacerbate natural hazard risk, including transferring risk to any other site.;</b></p> <p><b>h. How the activity incorporates mitigation of risk to life, property and the environment; and</b></p> <p><b>i. Any adverse effects on</b></p>

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						<b>the environment of any proposed natural hazard mitigation measures.</b>
Steve Croasdale (S516)	S516.015	Natural Hazards	NHR43	Support		Retain
Steve Croasdale (S516)	S516.016	Planning Maps and Overlays	Natural Hazards	Amend	Westport Hazard overlay is inappropriate.	Amend overlay.
Steve Croasdale (S516)	S516.017	Natural Hazards	Westport Hazard Overlay	Amend	Associated provisions take an excessively restrictive approach to hazard management and mitigation.	Amend associated objectives, policies and rules to be more enabling of development.
Steve Croasdale (S516)	S516.018	Sites and Areas of Significance to Māori	SASM - P14	Support		Retain
Steve Croasdale (S516)	S516.019	Sites and Areas of Significance to Māori	SASM - P15	Support		Retain
Steve Croasdale (S516)	S516.020	Sites and Areas of Significance to Māori	SASM -R2	Support		Retain
Steve Croasdale (S516)	S516.021	Sites and Areas of Significance to Māori	SASM -R3	Support		Retain
Steve Croasdale (S516)	S516.022	Sites and Areas of Significance to Māori	SASM -R4	Support		Retain
Steve Croasdale (S516)	S516.023	Sites and Areas of Significance to Māori	SASM -R5	Support		Retain
Steve Croasdale (S516)	S516.024	Sites and Areas of Significance to Māori	SASM -R6	Amend	Concerned about the uncertainty around this rule and how restrictive it is for my property.	Consider amending to be more enabling.
Steve Croasdale (S516)	S516.025	Sites and Areas of Significance to Māori	SASM - R12	Amend	Concerned about the uncertainty around this rule and how restrictive it is for my property.	Amend to Controlled or Restricted Discretionary.
Steve Croasdale (S516)	S516.026	Sites and Areas of Significance to Māori	SASM - R13	Amend	Concerned about the uncertainty around this rule and how restrictive it is for my property.	Amend to Controlled or Restricted Discretionary.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Steve Croasdale (S516)	S516.027	Sites and Areas of Significance to Māori	SASM - R15	Oppose	Too restrictive.	Delete
Steve Croasdale (S516)	S516.028	Sites and Areas of Significance to Māori	SASM - R15	Amend		Alternative relief:Amend to Discretionary.
Steve Croasdale (S516)	S516.029	Sites and Areas of Significance to Māori	SASM - R16	Amend	Too restrictive.	Delete.
Steve Croasdale (S516)	S516.030	Sites and Areas of Significance to Māori	SASM - R16	Amend		Alternative relief:Amend to Discretionary.
Steve Croasdale (S516)	S516.031	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity Objectives	Support		Retain
Steve Croasdale (S516)	S516.032	Ecosystems and Indigenous Biodiversity	ECO - P1	Amend	Deadline is too ambitious to undertake the work in a way that sufficiently involves landowners.	Amend point 2. iii. as follows: Buller and Westland district wide assessment, identification and mapping of significant natural areas will be undertaken <del>and completed by June 2027</del> ; and
Steve Croasdale (S516)	S516.033	Ecosystems and Indigenous Biodiversity	ECO - P2	Amend	The term "functional need" does not go far enough in recognising that some activities are required to operate in certain areas.	Amend point d. as follows: The activity has a functional, <b>technical, operational or locational</b> need to be located in the area;
Steve Croasdale (S516)	S516.034	Ecosystems and Indigenous Biodiversity	ECO - P3	Support		Retain
Steve Croasdale (S516)	S516.035	Ecosystems and Indigenous Biodiversity	ECO - P6	Amend	I believe that some of the terms used in this policy need defining.	Define the technical ecological terms used in this policy.
Steve Croasdale (S516)	S516.036	Ecosystems and Indigenous Biodiversity	ECO - P7	Amend	the fixed location of mineral deposits is not provided for in the policy.	Retain point h. Amend to recognise that, in some instances, vegetation clearance is unavoidable (e.g. in the case of accessing mineral resource) but that these effects can be temporary due so

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						subsequent restoration processes
Steve Croasdale (S516)	S516.037	Ecosystems and Indigenous Biodiversity	ECO - P8	Support		Retain
Steve Croasdale (S516)	S516.038	Ecosystems and Indigenous Biodiversity	ECO - P9	Support		Retain
Steve Croasdale (S516)	S516.039	Ecosystems and Indigenous Biodiversity	ECO - P10	Support		Retain
Steve Croasdale (S516)	S516.040	Ecosystems and Indigenous Biodiversity	Permitted Activities	Amend	I believe this is too restrictive.	Amend to be more enabling of development.
Steve Croasdale (S516)	S516.041	Ecosystems and Indigenous Biodiversity	ECO - R3	Amend	I believe this is too restrictive.	Amend to be more enabling of development.
Steve Croasdale (S516)	S516.042	Ecosystems and Indigenous Biodiversity	ECO - R5	Amend	I believe this is too restrictive.	Amend to be more enabling of development.
Steve Croasdale (S516)	S516.043	Ecosystems and Indigenous Biodiversity	ECO - R7	Support	I believe this is too restrictive.	Amend to be more enabling of development.
Steve Croasdale (S516)	S516.044	Ecosystems and Indigenous Biodiversity	ECO - R10	Support		Retain
Steve Croasdale (S516)	S516.045	Ecosystems and Indigenous Biodiversity	ECO - R11	Support		Retain
Steve Croasdale (S516)	S516.046	Natural Features and Landscapes	NFL - R14	Support		Retain
Steve Croasdale (S516)	S516.047	Natural Features and Landscapes	NFL - R15	Support		Retain
Steve Croasdale (S516)	S516.048	Public Access	Overview	Support		Retain
Steve Croasdale (S516)	S516.049	Public Access	PA - O1	Support		retain

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Steve Croasdale (S516)	S516.050	Subdivision	SUB - R6	Amend	some amendments are necessary.	Amend to be less restrictive.
Steve Croasdale (S516)	S516.051	Subdivision	SUB - R7/ECO - R4	Amend	Some amendments are necessary.	Amend to be less restrictive.
Steve Croasdale (S516)	S516.052	Subdivision	SUB - R9/ECO - R6	Amend	This is too restrictive.	Delete points 2 and 3.
Steve Croasdale (S516)	S516.053	Subdivision	SUB - R10	Support		Retain
Steve Croasdale (S516)	S516.054	Subdivision	SUB - R13	Support		Retain
Steve Croasdale (S516)	S516.055	Subdivision	SUB - R15/ECO - R8	Amend	This is too restrictive.	Delete points 1 and 2
Steve Croasdale (S516)	S516.056	Subdivision	SUB - R15/ECO - R8	Amend	This is too restrictive.	Amend "Non-complying" to "N/A" under "Activity status where compliance not achieved".
Steve Croasdale (S516)	S516.057	Subdivision	SUB - R16	Amend	Status where compliance is not achieved is too restrictive.	Amend "Non-complying" to "N/A" under "Activity status where compliance not achieved".
Steve Croasdale (S516)	S516.058	Subdivision	SUB - R17	Support		Retain
Steve Croasdale (S516)	S516.059	Subdivision	SUB - R23	Support		Retain
Steve Croasdale (S516)	S516.060	Subdivision	SUB - R24	Oppose		Delete
Steve Croasdale (S516)	S516.061	Subdivision	SUB - R25	Oppose		Delete
Steve Croasdale (S516)	S516.062	Subdivision	SUB - R27/ECO - R9	Oppose		Delete
Steve Croasdale (S516)	S516.063	Subdivision	SUB - S1	Amend	The minimum lot sizes for the General Rural Zone and Rural Lifestyle Zone are too large.	Amend General Rural Zone minimum lot size to 1 hectare. Amend Rural Lifestyle Zone minimum lot size to 0.5 hectare/5000m <sup>2</sup> .



Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Steve Croasdale (S516)	S516.064	Planning Maps and Overlays	Coastal Environment	Amend	This overlay is far too extensive	Amend and reduce the inland extent of the Coastal Environment Overlay.
Steve Croasdale (S516)	S516.065	Coastal Environment	CE - O1	Support		Retain
Steve Croasdale (S516)	S516.066	Coastal Environment	CE - O2	Support		Retain
Steve Croasdale (S516)	S516.067	Coastal Environment	CE - O3	Amend	The term "functional need" does not go far enough.	Amend as follows: To provide for activities which have a functional, <b>technical, operational or locational</b> need to locate in the coastal environment in such a way that the...
Steve Croasdale (S516)	S516.068	Coastal Environment	CE - P1	Support		Retain
Steve Croasdale (S516)	S516.069	Coastal Environment	CE - P4	Amend	I believe this policy needs amending.	Include a point <b>c. that provides for activities which have a functional, technical, operational or locational need to locate in the coastal environment</b>
Steve Croasdale (S516)	S516.070	Coastal Environment	CE - P5	Amend	I support this provision but believe this needs amending.	Amend point d. as follows: Have a functional, <b>technical, locational or operational</b> need to locate within the coastal environment.
Steve Croasdale (S516)	S516.071	Coastal Environment	CE - P6	Support		Retain
Steve Croasdale (S516)	S516.072	Coastal Environment	CE - R1	Support		Retain
Steve Croasdale (S516)	S516.073	Coastal Environment	CE - R2	Support		Retain
Steve Croasdale (S516)	S516.074	Coastal Environment	CE - R4	Amend	The maximum height limit of buildings and structures should be that specified for the particular zone.	Delete point 2. a. i.
Steve Croasdale (S516)	S516.075	Coastal Environment	CE - R4	Amend	The gross ground floor area is too restrictive and should revert to zone rules.	Delete point 2. a. iii.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Steve Croasdale (S516)	S516.076	Coastal Environment	Permitted Activities within the High Coastal Natural Character Overlay	Amend	I believe this is too restrictive.	Amend to be more enabling of development.
Steve Croasdale (S516)	S516.077	Coastal Environment	Permitted Activities within the Outstanding Coastal Environment Area	Amend	I believe this is too restrictive.	Amend to be more enabling of development.
Steve Croasdale (S516)	S516.078	Coastal Environment	CE - R12	Amend	I believe this is too restrictive.	Amend to be more enabling of development.
Steve Croasdale (S516)	S516.079	Coastal Environment	CE - R14	Amend	I believe this is too restrictive.	Amend to be more enabling of development.
Steve Croasdale (S516)	S516.080	Coastal Environment	CE - R15	Amend	I believe this is too restrictive.	Amend to be more enabling of development.
Steve Croasdale (S516)	S516.081	Coastal Environment	CE - R16	Amend	I believe this is too restrictive.	Amend to be more enabling of development.
Steve Croasdale (S516)	S516.082	Coastal Environment	CE - R17	Amend	I believe this is too restrictive.	Amend to be more enabling of development.
Steve Croasdale (S516)	S516.083	Coastal Environment	CE - R18	Amend	I believe this is too restrictive.	Amend to be more enabling of development.
Steve Croasdale (S516)	S516.084	Coastal Environment	CE - R19	Amend	I believe this is too restrictive.	Amend to be more enabling of development.
Steve Croasdale (S516)	S516.085	Coastal Environment	CE - R21	Amend	I believe this is too restrictive.	Amend to be more enabling of development.
Steve Croasdale (S516)	S516.086	Earthworks	EW - O1	Support		Retain
Steve Croasdale (S516)	S516.087	Earthworks	Earthworks Policies	Support		Retain
Steve Croasdale (S516)	S516.088	Earthworks	EW - R1	Amend	Earthworks rules are difficult to understand in the way they are currently structured.	Amend to provide more clarity.
Steve Croasdale (S516)	S516.089	Earthworks	EW - R2	Amend	I believe these rules are too restrictive.	Amend to be more enabling of development.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Steve Croasdale (S516)	S516.090	Earthworks	EW - R3	Amend	Earthworks rules are difficult to understand in the way they are currently structured.	Amend to provide more clarity.
Steve Croasdale (S516)	S516.091	Earthworks	EW - R3	Amend	I believe these rules are too restrictive.	Amend to be more enabling of development.
Steve Croasdale (S516)	S516.092	Earthworks	EW - R6	Support		Retain
Steve Croasdale (S516)	S516.093	Earthworks	Restricted Discretionary Activities	Support		Retain
Steve Croasdale (S516)	S516.094	Light	LIGHT - O1	Support		Retain
Steve Croasdale (S516)	S516.095	Light	LIGHT - P1	Support		Retain
Steve Croasdale (S516)	S516.096	Light	LIGHT - P2	Amend	Should extend to appropriate lighting of outdoor commercial/industrial activities.	Amend to include the enabling of artificial outdoor lighting that allows safe commercial and industrial activities.
Steve Croasdale (S516)	S516.097	Light	Permitted Activities	Amend	These rules are too complicated and restrictive.	Amend significantly to reduce complexity and be more enabling of development.
Steve Croasdale (S516)	S516.098	Rural Zones	Rural Zones Objectives	Support		Retain
Steve Croasdale (S516)	S516.099	Rural Zones	Rural Amenity and Character	Support		Retain
Steve Croasdale (S516)	S516.100	Rural Zones	Production Values	Support		Retain
Steve Croasdale (S516)	S516.101	Rural Zones	Non-Rural Activities	Support		Retain
Steve Croasdale (S516)	S516.102	Rural Zones	Visitor Economy	Support		Retain
Steve Croasdale (S516)	S516.103	Rural Zones	RURZ - P11	Support		Retain
Steve Croasdale (S516)	S516.104	Rural Zones	RURZ - P12	Support		Retain

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Steve Croasdale (S516)	S516.105	Rural Zones	Reverse sensitivity	Support		Retain
Steve Croasdale (S516)	S516.106	Rural Zones	Papakāingahousing	Support		Retain
Steve Croasdale (S516)	S516.107	Rural Zones	Mineral Extraction	Support		REtain
Steve Croasdale (S516)	S516.108	Rural Zones	Airfields and Helipads	Support		Retain
Steve Croasdale (S516)	S516.109	Planning Maps and Overlays	Rural Lifestyle Zone	Amend	It is more appropriately zoned Rural Lifestyle Zone.	Amend to rezone Lot 1 DP 450105 and Lot 2 DP 450105 (i.e. 115 Okari Road, Cape Foulwind), being included in the Rural Lifestyle Zone.
Steve Croasdale (S516)	S516.110	General Rural Zone	GRUZ - R1	Amend	Pre-existing non-compliance with points 1, 2, 3 and 4 should be recognised.	Amend so that existing non-compliance with points 1, 2, 3 and 4 of does not preclude the application of this rule.
Steve Croasdale (S516)	S516.111	General Rural Zone	GRUZ - R2	Amend	Pre-existing non-compliance with points 1, 2, 3 and 4 should be recognised.	Amend so that existing non-compliance with points 1, 2, 3 and 4 of does not preclude the application of this rule.
Steve Croasdale (S516)	S516.112	General Rural Zone	GRUZ - R3	Amend	Pre-existing non-compliance with points 1, 2, 3 and 4 should be recognised.	Amend so that existing non-compliance with points 1, 2, 3 and 4 of does not preclude the application of this rule.
Steve Croasdale (S516)	S516.113	General Rural Zone	GRUZ - R5	Amend	I believe this rule should be simplified.	Simplify the rule
Steve Croasdale (S516)	S516.114	General Rural Zone	GRUZ - R5	Amend	Pre-existing non-compliance with points 1, 2, 3 and 4 should be recognised.	amend so that existing non-compliance with points 1, 2, 3 and 4 of Rule GRUZ - R1 does not preclude the application of this rule.
Steve Croasdale (S516)	S516.115	General Rural Zone	GRUZ - R6	Support		Retain
Steve Croasdale (S516)	S516.116	General Rural Zone	GRUZ - R8	Amend	pre-existing non-compliance with Rule GRUZ - R1 should be recognised	Amend so that existing non-compliance with points 1, 2, 3 and 4 of Rule GRUZ - R1 does not preclude the application of this rule.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Steve Croasdale (S516)	S516.117	General Rural Zone	GRUZ - R9	Amend	pre-existing non-compliance with Rule GRUZ - R1 should be recognised	Amend so that existing non-compliance with points 1, 2, 3 and 4 of Rule GRUZ - R1 does not preclude the application of this rule.
Steve Croasdale (S516)	S516.118	General Rural Zone	GRUZ - R10	Amend	pre-existing non-compliance with Rule GRUZ - R1 should be recognised	Amend so that existing non-compliance with points 1, 2, 3 and 4 of Rule GRUZ - R1 does not preclude the application of this rule.
Steve Croasdale (S516)	S516.119	General Rural Zone	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.
Steve Croasdale (S516)	S516.120	General Rural Zone	GRUZ - R12	Amend	I believe the rule is also too restrictive.	Amend to be more enabling of development.
Steve Croasdale (S516)	S516.121	General Rural Zone	GRUZ - R16	Amend	pre-existing non-compliance with Rule GRUZ - R1 should be recognised	Amend so that existing non-compliance with points 1, 2, 3 and 4 of Rule GRUZ - R1 does not preclude the application of this rule.
Steve Croasdale (S516)	S516.122	General Rural Zone	GRUZ - R17	Amend	pre-existing non-compliance with Rule GRUZ - R1 should be recognised.	Amend so that existing non-compliance with points 1, 2, 3 and 4 of Rule GRUZ - R1 does not preclude the application of this rule.
Steve Croasdale (S516)	S516.123	General Rural Zone	GRUZ - R18	Support		Retain
Steve Croasdale (S516)	S516.124	General Rural Zone	GRUZ - R20	Amend	pre-existing non-compliance with Rule GRUZ - R1 should be recognised	Amend so that existing non-compliance with points 1, 2, 3 and 4 of Rule GRUZ - R1 does not preclude the application of this rule.
Steve Croasdale (S516)	S516.125	General Rural Zone	GRUZ - R21	Amend	pre-existing non-compliance with Rule GRUZ - R1 should be recognised	Amend so that existing non-compliance with points 1, 2, 3 and 4 of Rule GRUZ - R1 does not preclude the application of this rule.
Steve Croasdale (S516)	S516.126	General Rural Zone	GRUZ - R22	Amend	pre-existing non-compliance with Rule GRUZ - R1 should be recognised	Amend so that existing non-compliance with points 1, 2, 3 and 4 of Rule GRUZ - R1 does not preclude the application of this rule.
Steve Croasdale (S516)	S516.127	General Rural Zone	GRUZ - R24	Amend	pre-existing non-compliance with Rule GRUZ - R1 should be recognised	Amend so that existing non-compliance with points 1, 2, 3 and 4 of Rule GRUZ - R1 does not preclude the application of this rule.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Steve Croasdale (S516)	S516.128	General Rural Zone	GRUZ - R25	Support		Retain
Steve Croasdale (S516)	S516.129	General Rural Zone	GRUZ - R26	Support		Retain
Steve Croasdale (S516)	S516.130	General Rural Zone	GRUZ - R27	Support		Retain
Steve Croasdale (S516)	S516.131	General Rural Zone	GRUZ - R28	Support		Retain
Steve Croasdale (S516)	S516.132	General Rural Zone	GRUZ - R29	Support		Retain
Steve Croasdale (S516)	S516.133	General Rural Zone	GRUZ - R31	Amend	I believe this rule is too restrictive.	Delete point 1.
Steve Croasdale (S516)	S516.134	General Rural Zone	GRUZ - R31	Amend		Amend "Non-complying" to "N/A" under "Activity status where compliance not achieved".
Steve Croasdale (S516)	S516.135	Rural Lifestyle Zone	RLZ - R1	Support		Retain
Steve Croasdale (S516)	S516.136	Rural Lifestyle Zone	RLZ - R3	Amend	pre-existing non-compliance with Rule RLZ - R1 should be recognised.	Amend so that pre-existing non-compliance with Rule RLZ - R1 does not preclude the application of this rule.
Steve Croasdale (S516)	S516.137	Rural Lifestyle Zone	RLZ - R5	Amend	pre-existing non-compliance with Rule RLZ - R1 should be recognised.	Amend so that pre-existing non-compliance with Rule RLZ - R1 does not preclude the application of this rule.
Steve Croasdale (S516)	S516.138	Rural Lifestyle Zone	RLZ - R6	Amend		Retain
Steve Croasdale (S516)	S516.139	Rural Lifestyle Zone	RLZ - R7	Amend	pre-existing non-compliance with Rule RLZ - R1 should be recognised.	Amend so that pre-existing non-compliance with Rule RLZ - R1 does not preclude the application of this rule.
Steve Croasdale (S516)	S516.140	Rural Lifestyle Zone	RLZ - R8	Amend	pre-existing non-compliance with Rule RLZ - R1 should be recognised.	Amend so that pre-existing non-compliance with Rule RLZ - R1 does not preclude the application of this rule.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Steve Croasdale (S516)	S516.141	Rural Lifestyle Zone	RLZ - R9	Amend	pre-existing non-compliance with Rule RLZ - R1 should be recognised.	Amend so that pre-existing non-compliance with Rule RLZ - R1 does not preclude the application of this rule.
Steve Croasdale (S516)	S516.142	Rural Lifestyle Zone	RLZ - R12	Amend	pre-existing non-compliance with Rule RLZ - R1 should be recognised.	Amend so that pre-existing non-compliance with Rule RLZ - R1 does not preclude the application of this rule.
Steve Croasdale (S516)	S516.143	Rural Lifestyle Zone	RLZ - R13	Amend	pre-existing non-compliance with Rule RLZ - R1 should be recognised.	Amend so that pre-existing non-compliance with Rule RLZ - R1 does not preclude the application of this rule.
Steve Croasdale (S516)	S516.144	Rural Lifestyle Zone	RLZ - R14	Amend	pre-existing non-compliance with Rule RLZ - R1 should be recognised.	Amend so that pre-existing non-compliance with Rule RLZ - R1 does not preclude the application of this rule.
Steve Croasdale (S516)	S516.145	Rural Lifestyle Zone	RLZ - R16	Amend	Restrictive.	Delete point 1.
Steve Croasdale (S516)	S516.146	Rural Lifestyle Zone	RLZ - R16	Amend	Non-compliance should not mean the activity is Non-complying	Amend "Non-complying" to "N/A" under "Activity status where compliance not achieved".
Steve Croasdale (S516)	S516.147	Rural Lifestyle Zone	RLZ - R17	Amend	This rule is too restrictive.	Amend to be more enabling of development.
Steve Croasdale (S516)	S516.148	Rural Lifestyle Zone	RLZ - R19	Support		Retain
Steve Croasdale (S516)	S516.149	Rural Lifestyle Zone	RLZ - R20	Support		Retain
Steve Croasdale (S516)	S516.150	Rural Lifestyle Zone	RLZ - R21	Support		Retain
Steve Croasdale (S516)	S516.151	Rural Lifestyle Zone	RLZ - R22	Support		Retain
Steve Croasdale (S516)	S516.152	Rural Lifestyle Zone	RLZ - R23	Oppose		Delete
Steve Croasdale (S516)	S516.153	Rural Lifestyle Zone	RLZ - R24	Oppose		Delete

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Steve Croasdale (S516)	S516.154	Rural Lifestyle Zone	RLZ - R25	Oppose		Delete
Steve Croasdale (S516)	S516.155	SCHED4 - SCHEDULE OF SIGNIFICANT NATURAL AREAS	SCHED4 - SCHEDULE OF SIGNIFICANT NATURAL AREAS	Support		Retain
Steve Croasdale (S516)	S516.156	SCHED5 - SCHEDULE OF OUTSTANDING NATURAL LANDSCAPES	SCHED5 - SCHEDULE OF OUTSTANDING NATURAL LANDSCAPES	Support	I support that Lot 1 DP 450105 and Lot 2 DP 450105 are not included in the schedule.	Retain
Steve Croasdale (S516)	S516.157	SCHED6 - SCHEDULE OF OUTSTANDING NATURAL FEATURES	SCHED6 - SCHEDULE OF OUTSTANDING NATURAL FEATURES	Support	I support that Lot 1 DP 450105 and Lot 2 DP 450105 are not included in the schedule.	Retain
Steve Croasdale (S516)	S516.158	SCHED7 - SCHEDULE OF HIGH COASTAL NATURAL CHARACTER	SCHED7 - SCHEDULE OF HIGH COASTAL NATURAL CHARACTER	Support	I support that Lot 1 DP 450105 and Lot 2 DP 450105 are not included in the schedule.	Retain
Steve Croasdale (S516)	S516.159	SCHED8 - SCHEDULE OF OUTSTANDING COASTAL NATURAL CHARACTER	SCHED8 - SCHEDULE OF OUTSTANDING COASTAL NATURAL CHARACTER	Support	I support that Lot 1 DP 450105 and Lot 2 DP 450105 are not included in the schedule.	Retain
Steve Croasdale (S516)	S516.160	Appendix One: Transport Performance Standards	Appendix One: Transport Performance Standards	Amend	These unnecessarily restrictive and complex.	Amend to be less onerous, more consistent and correct errors.
Stevenson Mining Limited (S502)	S502.001	STRATEGIC DIRECTION	Mineral Extraction	Support	SML generally supports the objectives in this section. Given the importance of minerals to the West Coast region it is vital that they are fully considered within the proposed plan. The mineral extractive sector generates a significant contribution to the social, economic and	Retain Objectives MIN 01-06



Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					environmental wellbeing of the West Coast and New Zealand.	
Stevenson Mining Limited (S502)	S502.002	Mineral Extraction Zone	Overview	Support	an appropriate mechanism to include discrete, long term mineral extraction activities.	Retain
Stevenson Mining Limited (S502)	S502.003	Mineral Extraction Zone	Mineral Extraction Zone Objectives	Support		Retain
Stevenson Mining Limited (S502)	S502.004	Mineral Extraction Zone	Mineral Extraction Policies	Support		Retain
Stevenson Mining Limited (S502)	S502.005	Mineral Extraction Zone	MINZ - R8	Support		Retain
Stevenson Mining Limited (S502)	S502.006	Mineral Extraction Zone	MINZ - R9	Support		Retain
Stevenson Mining Limited (S502)	S502.007	Mineral Extraction Zone	MINZ - R10	Support		Retain
Stevenson Mining Limited (S502)	S502.008	Mineral Extraction Zone	MINZ - R1	Amend	Overlays should be matters to have regard to for activities in the zone..	Amend Advice Note from <del>compliance with</del> to <b>have regard to.</b>
Stevenson Mining Limited (S502)	S502.009	Mineral Extraction Zone	MINZ - R2	Amend	Overlays should be matters to have regard to for activities in the zone..	Amend Advice Note from <del>compliance with</del> to <b>have regard to.</b>
Stevenson Mining Limited (S502)	S502.010	Mineral Extraction Zone	MINZ - R3	Amend	Overlays should be matters to have regard to for activities in the zone..	Amend Advice Note from <del>compliance with</del> to <b>have regard to.</b>
Stevenson Mining Limited (S502)	S502.011	Mineral Extraction Zone	MINZ - R6	Amend	Overlays should be matters to have regard to for activities in the zone..	Amend Advice Note from <del>compliance with</del> to <b>have regard to.</b>
Stevenson Mining Limited (S502)	S502.012	Mineral Extraction Zone	MINZ - R7	Amend	Overlays should be matters to have regard to for activities in the zone..	Amend Advice Note from <del>compliance with</del> to <b>have regard to.</b>
Stevenson Mining Limited (S502)	S502.013	Planning Maps and Overlays	Mineral Extraction Zone	Amend	Te Kuha, the access road to the mine area has not been included and will need to be added.	Add the access road to the Mineral Extraction Zone at Te Kuha.
Stewart & Catherine Nimmo (S559)	S559.001	Planning Maps and Overlays	Natural Features and Landscapes	Oppose	Oppose ONL 31 - The line which identifies the ONL is inappropriate and includes highly modified residential subdivision. The site is highly modified	Align the ONL boundary with existing property lines.

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					and not outstanding. The line which has been drawn to identify this overlay appears to have been arbitrarily drawn.	
Stewart & Catherine Nimmo (S559)	S559.002	Planning Maps and Overlays	High Natural Character	Oppose	Re NCA 37 and NCA 38 - the line which identifies the HCNC is inappropriate and includes highly modified residential subdivision. The site is highly modified and not outstanding. The line which has been drawn to identify this overlay appears to have been arbitrarily drawn.	Align the HCNC boundary with existing property lines
Stewart & Catherine Nimmo (S559)	S559.003	Natural Hazards	NHR33	Oppose	Any residential activity (by definition of "sensitive activity") will require resource consent within the Land Instability Overlay. Given that there is an approved subdivision with existing dwellings and ancillary buildings, this is unduly restrictive.	Remove Restricted discretionary activity status for existing subdivisions. Alternatively, exclude residential activities other than primary residential dwellings from this rule.
Stewart & Catherine Nimmo (S559)	S559.004	Ecosystems and Indigenous Biodiversity	ECO - R2	Oppose	The 500m2 clearance in the coastal environment is unduly restrictive and unnecessary for the protection of the coastal character or indigenous biodiversity. It does not enable clearance for a typical rural dwelling and access and is inconsistent with the underlying zoning of the property as rural residential.	Alternatively, increase vegetation clearance area in the coastal environment to more accurately reflect the vegetation clearance required in a typical build. H4
Stewart & Catherine Nimmo (S559)	S559.005	Natural Features and Landscapes	NFL - P3	Support	Recognises that there are settlements, farms and infrastructure located within outstanding natural landscapes or outstanding natural features and provide for new activities and existing uses in these areas where the values that contribute to the outstanding natural landscape or feature are not adversely affected.	Retain as notified
Stewart & Catherine Nimmo (S559)	S559.006	Natural Features and Landscapes	NFL - R5	Oppose	The maximum height limit above 5m for buildings and structures does not reflect the topography of the land or its	Remove 5m building limit for established subdivisions. Alternatively, provide a more realistic building

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					intended purpose as a rural residential subdivision. The limit is unduly prohibitive.	height limit which considers the sloping topography of the area, and amend relevant definitions as necessary
Stewart & Catherine Nimmo (S559)	S559.007	Natural Features and Landscapes	NFL - R6	Oppose	The cut height is unduly restrictive and not reflective of the topography of NFL's on the West Coast. Particularly in existing subdivisions which are intended for residential subdivision and have existing dwellings.	Remove 1 metre cut height or alternatively provide a more generous cut height which enables residential development as intended in existing subdivisions. Remove reference to Coastal Environment.
Stewart & Catherine Nimmo (S559)	S559.008	Natural Features and Landscapes	NFL - R8	Oppose	Residential buildings within an NFL are not included in the list of permitted activities, despite there being rural residential subdivisions located within the NFL. The maximum height limits for buildings is unduly prohibitive, particularly where the majority of the Coasts NFL areas are sloping in nature. The floor limits would also be unduly restrictive for a residential build which the submitter seeks to include.	Remove 3m height limit as it is arbitrary, particularly given the topography of NFL's. Alternatively, provide a more realistic building height limit which considers the sloping topography of the area. Inclusion of residential buildings as a permitted activity, and increase floor area to 250m2 minimum to enable houses.
Stewart & Catherine Nimmo (S559)	S559.009	Natural Features and Landscapes	NFL - R10	Oppose	Controlled activity standard 2. Is ambiguous and uncertain	Delete controlled activity standard 2.
Stewart & Catherine Nimmo (S559)	S559.010	Coastal Environment	CE - O1	Support	The submitter supports this objective which seeks to preserve the character of the coastal environment while recognising that the coastal environment is important in providing for people's social and economic wellbeing.	Retain as notified
Stewart & Catherine Nimmo (S559)	S559.011	Coastal Environment	CE - P5	Oppose	The submitter supports the provision for buildings and structures within the coastal environment, of an appropriate scale, however considers that the provisions which flow on from this policy do not reflect what is appropriate in all parts of the coastal environment. In addition, the policy does not recognise that there are	Include as additional text: a. Are existing lawfully established structures or sites;

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					existing subdivisions within the coastal environment where only some lots have been developed and some remain to be developed.	
Stewart & Catherine Nimmo (S559)	S559.012	Coastal Environment	CE - P6	Support	The submitter supports the provision for buildings and structures within the coastal environment, of an appropriate scale, however considers that the provisions which flow on from this policy do not reflect what is appropriate in all parts of the coastal environment.	Retain as notified
Stewart & Catherine Nimmo (S559)	S559.013	Coastal Environment	CE - P7	Support	The submitter supports this provision, which allows for development in areas already modified and expansion of existing settlements, however is concerned that the provisions which flow on from this policy are inappropriate.	Retain as notified
Stewart & Catherine Nimmo (S559)	S559.014	Coastal Environment	CE - R4	Oppose	The coastal environment covers vast areas of the West Coast Region. The proposed restrictions on building in the Coastal Environment are unduly restrictive and do not provide for residential or rural activities which are anticipated by the zones. Many established buildings are already 200m <sup>2</sup> and the rule would trigger a resource consent for almost every dwelling. The floor heights and floor area are unduly restrictive.	Remove gross ground floor area size limit for buildings in the RLZ zone by deleting CE - R4.2.iii.1. Alternatively replace with a more appropriate ground floor area limit which provides for reasonably sized residential dwellings within the coastal environment in line with the operative District Plans.,
Stewart & Catherine Nimmo (S559)	S559.015	Coastal Environment	CE - R8	Oppose	The maximum height limit above 5m for buildings and structures does not reflect the topography of the land or for sites which are already identified as a rural residential subdivision. The limit is unduly prohibitive.	Remove height limit or alternatively set more appropriate height limit where subdivision is in place.

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Stewart & Catherine Nimmo (S559)	S559.016	Natural Features and Landscapes	NFL - R11	Oppose	Earthworks are not enabled in an area that has been approved for subdivision and which has a number of dwellings which are established.	Include access and building platforms as a permitted activity.
Stewart & Catherine Nimmo (S559)	S559.017	Coastal Environment	CE - R16	Oppose	Matters of discretion are unduly restrictive for an identified and established subdivision. The matters of discretion (other than those which relate to landscape and amenity value) do not relate to ONL status.	Remove all matters of discretion where existing subdivisions are in place except those which relate to landscape and amenity values
Stewart & Catherine Nimmo (S559)	S559.018	Coastal Environment	CE - R16	Oppose	Matters of discretion are unduly restrictive for an identified and established subdivision. The matters of discretion (other than those which relate to landscape and amenity value) do not relate to ONL status.	Remove all matters of discretion where existing subdivisions are in place except those which relate to landscape and amenity values
Stewart & Catherine Nimmo (S559)	S559.019	Earthworks	EW - R1	Support	This rule is a duplication of regional council rules and the 1.5m cut height is unduly restrictive, particularly in existing subdivisions with existing dwellings,.	Remove 1.5m cut height or alternatively provide a more generous cut height which enables residential development as intended in existing subdivisions.
Stewart & Catherine Nimmo (S559)	S559.020	Earthworks	EW - R3	Oppose	500m2 is insufficient for building platform and access on land which has been identified for subdivision and where existing residential dwellings in the subdivision is well established.	Remove 500m2 limit on earthworks in the RLZ . Alternatively, provide a more generous earthworks limit such as 2000m2
Stewart & Catherine Nimmo (S559)	S559.021	Subdivision	SUB - S1	Oppose	4ha is too large for a bush block where it is possible to have a sense of spaciousness and rural character and where privacy can be gained without adverse effects to neighbours seeking a rural lifestyle.	Remove the minimum 4ha and replace with something more practical for today's lifestyle housing requirements eg 5000m2 or 1ha
Stewart & Catherine Nimmo (S559)	S559.022	General Rural Zone	GRUZ - R3	Oppose	4ha is too large for residential density in a bush block where it is possible to have a sense of spaciousness and rural character and where privacy can be gained without adverse effects to neighbours seeking a rural lifestyle.	Remove the minimum 4ha and replace with something more practical for today's lifestyle housing requirements eg 5000m2 or 1ha

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Stewart & Catherine Nimmo (S559)	S559.023	Planning Maps and Overlays	Planning Maps and Overlays	Amend	<p>a. there are existing controls in place in relation to the section which enable development of the section in a manner that is harmonious with the surroundings;</p> <p>b. the highly modified nature of the pockets of land to the south at Point Elizabeth Heights and to the north with other subdivisions</p> <p>c. The land will be zoned as rural lifestyle zone under the TTPP and the controls in place in the overlays are inappropriate;</p> <p>d. the West Coast Regional Land and Water Plan places restrictions on the clearance of vegetation on this property as it sits within the Greymouth Earthworks control area. Additional controls are considered an unnecessary duplication.</p>	Pull the overlays back to the boundary of the Point Elizabeth Heights subdivision at Cobden to where it abuts the Rapahoe Scenic Range Reserve.
Straterra (S536)	S536.001	STRATEGIC DIRECTION	Mineral Extraction	Support	We strongly support the Strategic Objectives, MIN-01 to MIN-06. These set out the overarching direction for matters relating to mineral extraction and allow for a consenting pathway to address adverse effects including offsetting and compensation. The sentence at the end of MIN 01-06 is very important. It says all other chapters are to be read and achieved in a manner consistent with these strategic objectives.	Retain as notified
Straterra (S536)	S536.002	STRATEGIC DIRECTION	STRATEGIC DIRECTION	Amend	<p>The sentence at the end of MIN 01-06 is very important. It says all other chapters are to be read and achieved in a manner consistent with these strategic objectives.</p> <p>To ensure this occurs and to ensure that the Mineral Extraction Strategic</p>	Add links to the mineral extraction strategic objectives to all relevant chapters

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					Objectives are considered in resource consent applications, they need to be better carried through to the other chapters in the proposed plan. There would be more clarity and certainty if other chapters referred back to them more often - having regard to them etc.	
Straterra (S536)	S536.003	Planning Maps and Overlays	Ecosystems and Indigenous Biodiversity	Oppose in part	The size and the extent of the significant natural areas (SNAs), is significant throughout the West Coast and there is much overlap with the Mineral Extraction Zone and the Buller Coalfield Zone. It is not clear how the SNA overlays have been determined and what criteria was used. We challenge the size and accuracy of them in some places.	Review the size and extent of the SNAs and provide more information on the criteria used
Straterra (S536)	S536.004	Planning Maps and Overlays	Natural Features and Landscapes	Oppose in part	The size and the extent of the outstanding natural landscapes (ONLs), is significant throughout the West Coast and there is much overlap with the Mineral Extraction Zone and the Buller Coalfield Zone. It is not clear how the SNA overlays have been determined and what criteria was used. We challenge the size and accuracy of them in some places.	Review the size and extent of the ONLs and provide more information on the criteria used
Straterra (S536)	S536.005	PART 2 - DISTRICT WIDE MATTERS	PART 2 - DISTRICT WIDE MATTERS	Amend	The widespread presence of the overlays negates the enabling provisions for mining activities. The activity status of mineral extraction activities are downgraded when they occur within the overlays and there is tension as to the relative weighting between mining and environmental protection.	Ensure that access to a consenting pathway within the SNA and other overlays remains including with the ability to offset and compensate
Straterra (S536)	S536.006	Sites and Areas of Significance to Māori	SASM - R15	Oppose	We are concerned with the non-complying status of some of the rules in the Sites and Areas of Significance to	Provide for a Discretionary Activity rather than non-complying

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					Māori, in particular SASM-R15. This has come in amended provisions subsequent to the notification of the proposed plan.	
Straterra (S536)	S536.007	Sites and Areas of Significance to Māori	SASM - R18	Oppose	We are concerned with the non-complying status of some of the rules in the Sites and Areas of Significance to Māori, in particular SASM-R18. This has come in amended provisions subsequent to the notification of the proposed plan.	Provide for a Discretionary Activity rather than non-complying
Straterra (S536)	S536.008	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity Rules	Oppose	A major concern with the proposed plan relates to the impact of SNAs in the transition period between the plan being notified and when it becomes fully operative. Specifically, the SNA, and other overlay provisions have immediate legal effect since notification but the enabling provisions, both in the mining zones and outside, will not become operative until decisions are made much later. This will clearly cause problems for consent applications in that interim period.	Amend so ecosystems and biodiversity provisions do not have legal effect until the plan is operative
Straterra (S536)	S536.009	Mineral Extraction Zone	MINZ - R2	Amend	Also, under MINZ-R2, mineral extraction and processing that is lawfully established at the date the Plan becomes operative has a permitted activity status. But to avoid uncertainty in the transition period, this should be from the date the proposed plan was notified.	Amend the rule so that ral extraction and processing that is lawfully established at the date the Plan was proposed has a permitted activity status
Straterra (S536)	S536.010	Buller Coalfield Zone	Buller Coalfield Zone	Support	Mining is very important to the West Coast economy, contributing 8.4% of its gross domestic product (GDP). In Buller, mining's contribution is an exceptional 21.3% of GDP and it directly employs 9.7% of its workforce.	Retain the Buller Coalfield Zone



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					The indirect contribution is much greater. Mining jobs in the region pay about double the median salary.	
Straterra (S536)	S536.011	Mineral Extraction Zone	Mineral Extraction Zone	Support	Mining is very important to the West Coast economy, contributing 8.4% of its gross domestic product (GDP). In Buller, mining's contribution is an exceptional 21.3% of GDP and it directly employs 9.7% of its workforce. The indirect contribution is much greater. Mining jobs in the region pay about double the median salary.	Retain the mineral extraction zone.
Straterra (S536)	S536.012	Planning Maps and Overlays	Mineral Extraction Zone	Amend	the MINZ contains a mix of different types of mines and quarries spread across different areas of the West Coast. It will be important that areas are not left out for the zones to be comprehensive. It should also be recognised that many mines and quarries are not captured by either zone and the ability of those to continue to operate, be developed and gain resource consent should be protected, and a consent pathway provided.	Ensure that important mines and quarries are not left out of the zone
Straterra (S536)	S536.013	Mineral Extraction Zone	Rules	Amend	many of the restrictions and conditions around some of the ancillary activities are too strict and need amending.	Amend the provisions for ancillary activities to make more enabling
Straterra (S536)	S536.014	Mineral Extraction Zone	Overview	Support	The proposed plan intends mineral extraction outside the Special Purpose Zones to be enabled. We support this, specifically the statement in the Overview of the Mineral Extraction Zone: "It is anticipated that there will continue to be widespread mineral extraction outside of the MINZ - Mineral Extraction Zone."	Retain the statement and approach of enablement of mineral extraction
Straterra (S536)	S536.015	ZONES	ZONES	Support	MIN-02 specifies the General Rural and Open Space Zones as zones in which mineral extraction is enabled, but other	Retain widespread consenting pathway for mineral extraction across the zones

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					zones should not be ruled out and, in fact, a consenting pathway is available in other zones which is appropriate.	
Straterra (S536)	S536.016	Interpretation	EARTHWORKS	Amend	In spite of the permissive wording, matters such as earthworks mean that activities are not sufficiently enabled as intended.	Amend the definition of earthworks so that mineral extraction prospecting and exploration are excluded
Straterra (S536)	S536.017	Rural Zones	RURZ - P18	Amend	The point made above about the special nature of mineral resources and the fact that they can only be mined where they are located is recognised throughout the proposed plan, but the wording is not always clear or consistent.	use of the term 'functional, technical, operational or locational need of any activity to be sited in the particular location',
Straterra (S536)	S536.018	Open Space and Recreation Zones	OSRZ - P9	Amend	The point made above about the special nature of mineral resources and the fact that they can only be mined where they are located is recognised throughout the proposed plan, but the wording is not always clear or consistent.	use of the term 'functional, technical, operational or locational need of any activity to be sited in the particular location',
Straterra (S536)	S536.019	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity	Oppose	We note that the terminology for much of this chapter is very directive. Words such as 'avoid', 'protect' and 'prevent' are used. Not only do these remove scope for, but they contradict the intent of many of the policies and rules which allow for net gain e.g. for offsetting and compensation.	Remove works such as 'avoid', 'protect' and 'prevent' and replace these with ones that support the intent of the policies and rules to allow for net gain through offsetting and compensation
Straterra (S536)	S536.020	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity Rules	Amend	The vegetation clearance rules in the Ecosystems and Indigenous Biodiversity chapter are complicated and fragmented and cause some difficulty. Given the WCRPS is a relatively recent regional policy statement, and its status, i.e. it is a requirement of the district plan to give effect to it, it makes sense to use the	Use the biodiversity management hierarchy from the West Coast Regional Policy Statement (WCRPS) as a template for the vegetation clearance rules.

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					WCRPS's biodiversity management hierarchy in this way	
Straterra (S536)	S536.021	Ecosystems and Indigenous Biodiversity	ECO - P7	Support	We note and support the consenting pathway for mineral extraction in ECO-P7.	Retain as notified
Straterra (S536)	S536.022	Ecosystems and Indigenous Biodiversity	ECO - P9	Support	We note and support the consenting pathway for mineral extraction in ECO-P9 and P9 including the allowance for compensation.	Retain as notified
Straterra (S536)	S536.023	Appendix Seven: Mineral Extraction Management Plan Requirements	Outline of Content Requirements for a Mineral Extraction Management Plan	Support	A Mineral Extraction Management Plan is required for many of the permitted and controlled activities, rather than a resource consent (if certain thresholds are met). We think this approach has merit, but the plan's requirements, as set out in Appendix Seven, duplicate the requirements of many of the other regulatory plans that are required (work and safety, transport, wildlife authorities etc.). For simplicity and to reduce compliance costs this duplication should be reduced and the requirements should only need to be provided once.	Amend the requirements so they do not duplicate other regulatory plans,
Straterra (S536)	S536.024	Ecosystems and Indigenous Biodiversity	ECO - P6	Oppose	Because of case law <sup>1</sup> which deems 'avoid' to mean avoid in a prohibitive sense, we request that care be taken in using the word and it be avoided wherever possible. Where the word is used by itself without the rest of the hierarchy there is a risk it is interpreted as prohibited and so it should be avoided.	Remove the word "avoid" from the policy
Straterra (S536)	S536.025	Interpretation	Interpretation	Amend	Throughout the proposed plan there are numerous mentions of the word 'avoid'. Because of case law <sup>1</sup> which deems 'avoid' to mean avoid in a prohibitive sense, we request that care be taken in	Remove the word "avoid" from the plan where it is not used within the wider effects management hierarchy

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					<p>using the word and it be avoided wherever possible.</p> <p>'Avoid' is, of course, an important part of the effects management hierarchy and so we support it being used in this context, i.e. if you can't avoid it then you have to remedy, mitigate, offset and compensate in that order.</p> <p>Where the word is used by itself without the rest of the hierarchy there is a risk it is interpreted as prohibited and so it should be avoided.</p>	
Straterra (S536)	S536.026	Whole Plan	Whole plan	Amend	<p>In many places the plan is written in a way that is unworkable with contradictions across different rules and inconsistency across districts. Some of this may be drafting error. For example, the workability of the numerous overlays and rules, and the interplay these have with the provisions specific to mineral extraction. The proposed plan is not clear how each rule breach in other chapters will be interpreted overall.</p>	Review the plan to ensure consistency and workability across overlays and zones
Straterra (S536)	S536.027	Natural Features and Landscapes	NFL - R15	Amend	the logic seems wrong,	Review the wording/logic of the rule
Straterra (S536)	S536.028	Interpretation	Definitions	Amend	there are some definitions that seem incorrectly cross referenced to the Resource Management Act (RMA),	review definitions to ensure cross references are correct
Straterra (S536)	S536.029	Interpretation	BUILDING	Amend	there are some definitions that seem incorrectly cross referenced to the Resource Management Act (RMA),	review definition to ensure correct cross references
Straterra (S536)	S536.030	Interpretation	EARTHWORKS	Amend	there are some definitions that seem incorrectly cross referenced to the Resource Management Act (RMA),	review definition to ensure correct cross references
Straterra (S536)	S536.031	Interpretation	DUST	Amend	there are some definitions that seem incorrectly cross referenced to the Resource Management Act (RMA),	review definition to ensure correct cross references

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Straterra (S536)	S536.032	Interpretation	COMMERCIAL ACTIVITY	Amend	there are some definitions that seem incorrectly cross referenced to the Resource Management Act (RMA),	review definition to ensure correct cross references
Straterra (S536)	S536.033	Planning Maps and Overlays	Natural Features and Landscapes	Amend	the Birchfield Coal Mines Ltd Rapahoe Coal Yard has been included in the overlay	Review boundary of overlay to exclude Rapahoe Coal Yard
Straterra (S536)	S536.034	Planning Maps and Overlays	Outstanding Natural Character	Amend	the Birchfield Coal Mines Ltd Rapahoe Coal Yard has been included in the overlay	Review boundary of overlay to exclude Rapahoe Coal Yard
Straterra (S536)	S536.035	Planning Maps and Overlays	High Natural Character	Amend	the Birchfield Coal Mines Ltd Rapahoe Coal Yard has been included in the overlay	Review boundary of overlay to exclude Rapahoe Coal Yard
Straterra (S536)	S536.036	Schedule Nine: Lawfully Established Mineral Extraction and Processing Areas	SCHED9 - LAWFULLY ESTABLISHED MINERAL EXTRACTION AND PROCESSING AREAS	Support	It is not explicit but Schedule Nine essentially defines the Buller Coalfield and Mineral Extraction Zones by listing the lawfully established mineral extraction and processing areas within them. It is not explicit but Schedule Nine essentially defines the Buller Coalfield and Mineral Extraction Zones by listing the lawfully established mineral extraction and processing areas within them.	that the Schedule be left open for additions to be made.
Straterra (S536)	S536.037	Schedule Ten: Previously Mined Locations in the Rural and Open Space and Recreation Zones	Schedule Ten: Previously Mined Locations in the Rural and Open Space and Recreation Zones	Support	It is important because GRUZ-R18 (and according to the schedule, OSZ-R19, but this isn't mentioned in the rule) refers to the schedule and stipulates areas included will be controlled activities for mineral extraction.	that the Schedule be left open for additions to be made.
Straterra (S536)	S536.038	General Rural Zone	GRUZ - R18	Support	We support mineral extraction on sites in previously mined areas as being a controlled activity.	Retain as notified
Straterra (S536)	S536.039	Interpretation	EARTHWORKS	Amend	Earthworks that are part of mineral prospecting, exploring and extraction activities would be addressed by associated rules.	Add, " <i>This excludes earthworks associated with mineral prospecting, exploration and extraction activities.</i> "

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Straterra (S536)	S536.040	Interpretation	MINERAL EXTRACTION	Amend	Access to, from and between sites, be they exploration, mine or ancillary, is necessary. 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 activity.	Insert, <i>"to, from and between"</i> after the words "access within".
Straterra (S536)	S536.041	Interpretation	MINERAL EXTRACTION	Amend		Include ancillary activities - access, overburden storage, disposal. Water management and support infrastructure.
Straterra (S536)	S536.042	Interpretation	MINERAL EXPLORATION	Amend		Include ancillary activities - access, overburden storage, disposal. Water management and support infrastructure.
Straterra (S536)	S536.043	Interpretation	MINERAL PROSPECTING	Amend		Include ancillary activities - access, overburden storage, disposal. Water management and support infrastructure.
Straterra (S536)	S536.044	STRATEGIC DIRECTION	NENV - O3	Amend	Activities other than infrastructure are located, or may need to be located, in these areas.	At item b. insert, "and activities" after the word Activities other than infrastructure are located, or may need to be "infrastructure".
Straterra (S536)	S536.045	Sites and Areas of Significance to Māori	SASM - P15	Amend	The MINZ and its activities would get captured by the SPZ zone inclusion as well as mineral prospecting, exploration and extraction activities in the zones included within RURZ and OSRZ. We would welcome a consenting pathway and access to the effects management hierarchy, which the discretionary status would provide, thereby allowing for a case-by-case consideration of the activity and the SAMS together with the mitigation and/or protection required.	Change the activity status of this rule from Non- Complying to Discretionary.

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Straterra (S536)	S536.046	Ecosystems and Indigenous Biodiversity	ECO- O2	Amend	Provide for mitigation where this is possible.	Insert at end, <i>"or if not where adverse effects can be mitigated"</i> .
Straterra (S536)	S536.047	Ecosystems and Indigenous Biodiversity	ECO - P2	Amend	Provide for mitigation where this is possible. "Functional and operational need", not just "operational need", is consistent with National Policy Statements e.g. NPS Highly Productive Land, and likely to be in NPS Indigenous Biodiversity.	At item e. insert at end, <i>"or where adverse effects can be mitigated"</i> . Add, <i>"or operational need"</i> .
Straterra (S536)	S536.048	Ecosystems and Indigenous Biodiversity	ECO - P6	Amend	Using the word avoid may prevent the use of the management or mitigation hierarchy, given the case law definition of this, and/or be inconsistent with the Regional Policy Statement.	Delete the word "avoid".
Straterra (S536)	S536.049	Ecosystems and Indigenous Biodiversity	ECO - P7	Amend	In practice management alone can also lead to the desired outcome. This ties into ECO-P8.	At item b insert the word <i>"or"</i> after the word "and".
Straterra (S536)	S536.050	Earthworks	EW - R2	Amend	For avoidance of doubt mineral extraction should be included in this list as earthworks are a large part of mineral extraction.	Add, j "mineral extraction and associated activities"
Straterra (S536)	S536.051	Natural Features and Landscapes	NFL - P3	Amend	Need to expand to recognise that there are other uses and activities.	Insert, <i>"land uses"</i> after the word "farms"
Straterra (S536)	S536.052	Natural Features and Landscapes	NFL - R15	Amend	Appears to be a drafting error with no lead provided in the rules for not meeting NFL-R10. Seems to be a similar situation to that described for ECO-R7 detailed above.	In the heading insert <i>"Controlled"</i> after the word "Permitted".
Straterra (S536)	S536.053	Open Space and Recreation Zones	OSRZ - O1	Support	Not all activities in these zones will "complement" and provision is required where this doesn't occur.	Insert, <i>"where possible"</i> after the word "should".
Straterra (S536)	S536.054	Open Space and Recreation Zones	OSRZ - P14	Amend	Mineral extraction may not be provided for in the management plan referenced at b.	Delete b.
Straterra (S536)	S536.055	Open Space and Recreation Zones	OSRZ - Open Space and	Support	Mineral extraction activities also occur in the NOSZ - Natural Open Space Zone.	Insert wording of OSRZ-P14 BUT change OSZ- Open Space Zone to NOSZ - Natural Zone.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
			Recreation Zones Policies		Mineral extraction may not be provided for in the management plan referenced at b.	Open Space Zone AND delete b.
Straterra (S536)	S536.056	Rural Zones	RURZ - O5	Amend	The word "minimised" does not have the same meaning as "avoided, remedied, or mitigated" which is clear and consistent with the RMA and recognises and provides or responsible minerals activities.	Replace "minimised" with, "avoided, remedied, or mitigated"
Straterra (S536)	S536.057	Rural Zones	RURZ - P19	Amend	The word "minimised" does not have the same meaning as "avoided, remedied, or mitigated" which is clear and consistent with the RMA and recognises and provides or responsible minerals activities.	Replace "minimised" with, "avoided, remedied, or mitigated".
Straterra (S536)	S536.058	Natural Open Space Zone	NOSZ - R16	Amend	Some land within the NOSZ is currently used for mineral extraction activities and as such Discretionary status may be more appropriate. 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.
Straterra (S536)	S536.059	Natural Open Space Zone	NOSZ - R16	Amend		Insert Mineral Prospecting and Exploration into the heading of the rule.
Straterra (S536)	S536.060	Open Space Zone	OSZ - R11	Amend	given proposed changes to NES-F / NPS-FM	100m wetland setback reference should be removed
Straterra (S536)	S536.061	Open Space Zone	OSZ - R11	Amend	Some drill programmes go for longer than three months so may not be practical to rehabilitate in this timeframe.	Under 3. increase the timeframe to one year.
Straterra (S536)	S536.062	Open Space Zone	OSZ - R22	Amend		Insert, Mineral Prospecting and Exploration, into the heading of the rule.
Straterra (S536)	S536.063	General Rural Zone	GRUZ - R11	Amend	Some drill programmes go for longer than three months so may not be	Under 3. increase the timeframe to one year.



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					practical to rehabilitate in this timeframe.	
Straterra (S536)	S536.064	Coastal Environment	CE - O1	Amend	The word "preserve" is too restrictive as it means no change is acceptable.	Replace "preserve" with "protect".
Straterra (S536)	S536.065	Hazardous Substances	HS - P3	Amend	Recognition of hazardous substances needed at mining operations.	Add, "at mining operations".
Straterra (S536)	S536.066	Hazardous Substances	HS - P4	Amend	"Avoid" means avoid in a prohibitive sense. This may prohibit any such activity in every case.	Delete "avoided" and replace with "remedied", "mitigated" or "offset".
Straterra (S536)	S536.067	Transport	TRN - R6	Amend	30 heavy vehicle movements per day for mining and quarrying is unworkable and too low.	Increase the number of heavy vehicle movements for a Permitted Activity
Straterra (S536)	S536.068	Mineral Extraction Zone	Overview	Support	There are a number of other authorisations not listed which are applicable so a broader reference would be more appropriate.	In the third paragraph, second sentence, replace "is from three different mechanisms and includes" with "includes the mechanisms of".
Straterra (S536)	S536.069	Mineral Extraction Zone	Overview	Amend	This is an important authorisation that should be included.	In the third paragraph, add a fourth point, " <i>Minerals permits under the Crown Minerals Act (1991)</i> ".
Straterra (S536)	S536.070	Mineral Extraction Zone	MINZ - P3	Amend	Best practice not always fit for purpose.	Replace "best practice" with "best practicable option".
Straterra (S536)	S536.071	Mineral Extraction Zone	MINZ - R1	Support	Some drill programmes go for longer than three months so may not be practical to rehabilitate in this timeframe.	Under 2. increase the timeframe to one year.
Straterra (S536)	S536.072	Mineral Extraction Zone	MINZ - R2	Amend	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 " <i>existing authorisations</i> ".
Straterra (S536)	S536.073	Mineral Extraction Zone	MINZ - R2	Amend	Potential issues of overlap, conflicts and re-litigation of matters already settled.	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

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						what is required is there'.
Straterra (S536)	S536.074	Mineral Extraction Zone	MINZ - R2	Support	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 6. Insert, " <i>or evidence that the bond is in place with another regulatory authority or land administrator</i> ".
Straterra (S536)	S536.075	Mineral Extraction Zone	MINZ - R3	Amend	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 6. Insert, " <i>or evidence that the bond is in place with another regulatory authority or land administrator</i> ".
Straterra (S536)	S536.076	Mineral Extraction Zone	MINZ - R3	Amend		At Item 4. increase the heavy vehicle movement to 100.
Straterra (S536)	S536.077	Natural Character and Margins of Waterbodies	Natural Character and the Margins of Waterbodies Rules	Amend	The Natural Character and Margins of Waterbodies chapter will need to be updated around wetland definitions and rules when the amendments to the NPS / NES FM are made.	Amend the chapter to reflect the most current NPSFM and NESFM requirements.
Stuart Marshall and Susan Gooch (S433)	S433.001	Planning Maps and Overlays	Natural Features and Landscapes	Oppose	Re land being Lot 2 DP324352, out at Lake Kaniere Road, see the below figure 1 from the TTPP mapping programme. There is a proposed Natural Environment Value of Outstanding Natural Landscape layer over part of the property (refer map in submission). I oppose this layer on the property,	Remove the ONL layer from Lot 2 DP324352, out at Lake Kaniere Road
Stuart Marshall and Susan Gooch (S433)	S433.002	Planning Maps and Overlays	Natural Hazards	Oppose		My Client's own land being Section 4 SO11562, at Kaniere-Kowhitirangi Road, see the below figures 2 and 3 from the TTPP mapping programme. I understand that the proposed zoning over the whole of the site is "General Rural Zone". And that there are three Hazards and Risks of Flood Plain, Flood Hazard Susceptibility, Flood Hazard Severe layers over parts of the property. I oppose the three Flood layers being added

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						<p>onto the property, and I request that they are removed from the property. I can understand the Flood Plain Layer, however more information is required by myself and my client so that they know what this means for them. It is requested that my client and myself are consulted with about the three layers e.g. sit down and show us where the evidence is that you have made the decision to put these layers on to the property. The house that was built on the property in 2013 has never flooded, yet you have put Flood Hazard Susceptibility over the dwelling.</p> <p>Also, extremely disappointing for my client is that your TTPP Mapping Programme does not enable this allotment to register with your programme - when the allotment is clicked on, the "Please wait" symbol just sits there. I do not think that this is a good thing, when people are trying to access the TTPP Mapping Programme to see what is proposed for their land.</p> <p>Thank you for the opportunity to make a submission on behalf of my clients regarding the proposed TTPP.</p> <p>Regards ,</p> <p>Lara Kelly</p>
Sue Templeton (S203)	S203.001	SCHED 3: SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 197	Amend	I have already built on 24 Johnston cres and there was never anything found that is significance to Maori. The whole section was just all sand. 53 Anderson Lane also has buildings	I oppose that sites and areas of significance to Maori on 53 Anderson Lane Okuru and 24 Johnston Cres Okuru.

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					on and we have never found anything that resembles significance to Maori.	
Sue Templeton (S207)	S207.001	Planning Maps and Overlays	Natural Hazards	Amend	<p>53 Anderson Lane, OKURU, Haast</p> <p>We have excellent protection from our Rock Sea Wall which surrounds Okuru village.</p> <p>Our funds in our Okuru Rating District Account cover any work that needs to be done in the future from river erosion.</p> <p>We have a Estuary in front of our sections "village" &amp; then out from that a Spit, which is a natural barrier from the sea.</p> <p>We also have "Open Bay Islands" (Taumaka Island) which sits out from Okuru. These Islands also protects us &amp; disperses the high seas further south and North of Okuru.</p>	Strongly oppose the overlay 'Coastal Severe' and wish to be changed to Coastal Alert.
Susan and Kevin Hall and Dunn (S218)	S218.001	SCHED4 - SCHEDULE OF SIGNIFICANT NATURAL AREAS	SCHED4 - SCHEDULE OF SIGNIFICANT NATURAL AREAS	Amend	<p>We are submitting on the apparent omission of a very rare and ecologically significant wetland as an SNA in the TTPP. The wetland in question adjoins both our property and that of our neighbour and is listed in the WCRC Land and Water Plan as Aratika BRUP056 (legal title: Lot 2 DP 3977).</p> <p>We consider this wetland meets the criteria defined in both the TTPP and West Coast RPS to qualify as an SNA [refer original submission for details on ecological values]. However, in terms of defining SNAs the</p> <p>Plan is unclear, confusing and inconsistent with the regional plan, leaving the</p> <p>status of the wetland uncertain. No-one at the GDC has been able to say why the wetland area in question has either</p> <p>a) been considered and then rejected</p>	Include the wetland listed in the WCRC Land and Water Plan as Aratika BRUP056 (legal title: Lot 2 DP 3977) as an SNA in the TTPP to ensure the ongoing protection of this special area.

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					for inclusion as a SNA, or alternatively b) not been considered at all.	
Susan and Kevin Hall and Dunn (S218)	S218.002	SCHED4 - SCHEDULE OF SIGNIFICANT NATURAL AREAS	SCHED4 - SCHEDULE OF SIGNIFICANT NATURAL AREAS	Amend	In terms of defining SNAs the Plan is unclear, confusing and inconsistent with the regional plan, leaving the Regional Plan Scheduled wetlands uncertain. SNAs are defined in the West Coast Regional Council RPS. The 2001 document titled "Significant Natural Area Assessment and Protection" appears to have been used by the Grey District Council to inform their decisions on which areas to classify as SNAs. This document does not seem to have been updated subsequently. The inclusion of SNAs in the TTPP should not be dependent on land owner permission and approval. This is especially so for wetlands, where nationally only 10% of wetlands remain intact, and many of these are in danger of draining, pollution or habitat disturbance. The existence and ongoing protection of the remaining wetlands is for the benefit of all New Zealand.	Clarify protection of wetlands that meet RPS criteria in TTPP.
Susan Fraser (S331)	S331.001	Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori Rules	Amend		Request to clarify the rules.
Susanne Pooley (S292)	S292.001	Planning Maps and Overlays	Sites and Areas of Significance to Māori	Oppose	We have owned this property for 25 years and it has been a family home for many years so has huge significance to us. It was purchased from Mawhera when they put it up for sale over 30 years ago by the previous owner. There is still a interest to Maori in a 8 metre strip	Remove SASM 101 from 326 Arthurstown Rd

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					<p>between ourselves and our neighbours which goes from the river to the paper road at the back of our property. We have always known this and respected it.</p> <p>We are aware that around us there has been historical cultural value to Maori and in fact leased the property of 285 Arthurstown rd for many years from Mawhera.</p> <p>At no stage has our property come up as having any interest to Maori so to be included in this plan has left us feeling nervous and blindsided.</p> <p>I would consider that this could impact any future rights and value to us and our property. I do not believe that this has been nearly transparent or inclusive enough.</p> <p>Any consideration would need to be a legal and binding contract that would have all parties considered and agreeable</p>	
Suzanne Hills (S443)	S443.001	Whole Plan	Whole plan	Amend	The Plan is overly complex, both with its multiplicity of zones and overlays, and the activity listings for numerous activity status classes of permitted, controlled, restricted discretionary, discretionary, non-complying.	Simplify the plan
Suzanne Hills (S443)	S443.002	STRATEGIC DIRECTION	STRATEGIC DIRECTION	Amend	The Plan contains much detail on mineral extraction activities and its emphasis is disproportionate to the many other activities of resource and land use on the West Coast. This has been at the expense not developing objectives, policies and rules for areas that are equally or more important, such as waste management and emissions reduction.	Include provisions in the plan for waste management and emissions reduction

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Suzanne Hills (S443)	S443.003	Interpretation	Definitions	Amend	Throughout the Plan there is an interchangeable use of key defining words or phrases, not all of which are listed in the definitions. All these key words phrases must be defined in the definitions, used 100% consistently in Plan and be consistent with the same definitions in the RMA and the RPS. Example 1: significant natural area, significant indigenous vegetation, significant habitats of indigenous fauna, and significant indigenous biodiversity. Example 2: many and varied words and phrases for cultural uses Example 3: Site, title, legal title.	Include definitions for all of the following: Significant natural area, significant indigenous vegetation, significant habitats of indigenous fauna, and significant indigenous biodiversity. All words and phrases for cultural uses Site, title, legal title.
Suzanne Hills (S443)	S443.004	Whole Plan	Whole plan	Amend	Offsetting and compensation are not alternatives to the RMA imperative of avoid, remedy and mitigate. Some objectives and policies, notably for mineral extraction, infer or state otherwise	Ensure that biodiversity offsetting or environmental compensation is only used within the WCRPS framework of addressing residual effects.
Suzanne Hills (S443)	S443.005	STRATEGIC DIRECTION	Mineral Extraction	Amend	The objective to ensure reverse sensitivity from new subdivisions does not compromise existing mineral extraction activities is applicable in the converse: to ensure reverse sensitivity from new mineral extraction does not compromise established residents or their activities	Amend strategic objectives to include the following: <b>To ensure that new mineral extraction, use and development does not compromise established rural residents or their land use activities, including through reverse sensitivity to residents' wellbeing thresholds to dust, noise and traffic</b>
Suzanne Hills (S443)	S443.006	STRATEGIC DIRECTION	STRATEGIC DIRECTION	Amend	Councils must have regard to emission reduction plans and national adaptation plans under the Climate Change Response Act 2002 (as amended by the Climate Change Response (zero Carbon) Amendment Act) when making and amending regional policy statements, regional plans and district plans.	Amend strategic direction to include emission reduction and decarbonisation as a strategic objective.

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					The parts of the Plan that have not yet come into legal effect, and will not do so until after 30 November 2022, are clearly required to have regard to the national emission reduction plans under the RMAA2020.	
Suzanne Hills (S443)	S443.007	STRATEGIC DIRECTION	Strategic Directions Overview	Amend	The strategic directions overview and list of "intended to demonstrate: points puts a greater emphasis on development rather than controlling land use activities for the purposes of use, development and protection in an integrated way.	Amend overview list of points as follow: # 2 should read <i>maintaining and enhancing environmental quality</i> .  # 5: A prosperous and <b>sustainable</b> economy to sustain and enhance the health and wellbeing of people, communities and ecosystems is the goal, not a <i>prosperous</i> economy.
Suzanne Hills (S443)	S443.008	STRATEGIC DIRECTION	Strategic Directions Overview	Amend	The statement: For the purposes of preparing, changing, interpreting, and implementing Te Tai o Poutini Plan, all other objectives and policies in all other chapters of this Plan are to be read and achieved in a manner consistent with these Strategic Directions, is inherently problematic and fundamentally flawed. Objectives and policies will and do clash and are invariably resolved or justified by "balancing" one against the other. This balancing act has proved to be an impossible task and leads to winners and losers. The climate and biodiversity crises are evidence that nature and ecosystems have lost. Hard bottom lines are needed in order for land and resource development and use decision-making to be centred on sustainability and decarbonisation to achieve climate stability and a liveable future for all.	Delete the following statement: For the purposes of preparing, changing, interpreting, and implementing Te Tai o Poutini Plan, all other objectives and policies in all other chapters of this Plan are to be read and achieved in a manner consistent with these Strategic Directions



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Suzanne Hills (S443)	S443.009	STRATEGIC DIRECTION	MIN - O1	Oppose	Oppose zones of the Buller Coalfield Zone and the Mineral Extraction Zone. As inferred in MIN O1, they appear to have been created in order to avoid the RMA resource consent process and instead rely on an ill thought out system of management plans. The resource consent process is robust, participatory and democratic good process to ensure resource use and development decisions meet the sustainable management purpose of the RMA. This process must not be undermined; it is fundamental to uphold democracy, social cohesion and protection of the environment.	Amend MIN - O1 to reflect robust, participatory and democratic good process to ensure resource use and development decisions meet the sustainable management purpose of the RMA
Suzanne Hills (S443)	S443.010	STRATEGIC DIRECTION	MIN - O2	Oppose	Oppose zones of the Buller Coalfield Zone and the Mineral Extraction Zone. They appear to have been created in order to avoid the RMA resource consent process and instead rely on an ill thought out system of management plans. The resource consent process is robust, participatory and democratic good process to ensure resource use and development decisions meet the sustainable management purpose of the RMA. This process must not be undermined; it is fundamental to uphold democracy, social cohesion and protection of the environment.	Amend MIN - O2 to reflect robust, participatory and democratic good process to ensure resource use and development decisions meet the sustainable management purpose of the RMA
Suzanne Hills (S443)	S443.011	STRATEGIC DIRECTION	MIN - O6	Amend	Without SNA identification in Buller and Westland, and no listings of significant indigenous vegetation and significant fauna habitat for those districts to be found in the Schedules, MIN O6 puts significant ecosystems and biodiversity at risk. MIN O6 b: Allowing adverse effects to	Amend MIN O6 to recognise that wellbeing adverse effects cannot be mitigated through biodiversity offset or environmental compensation.

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					<p>be addressed by alternative mitigation measures such as biodiversity offsetting and environmental compensation does nothing for unique and precious places such as Te Kuha - they would still be forever destroyed and lost as they cannot be restored to their former beautifully complicated and interdependent states of being. MIN O6 b states allow without the context of the RPS: in some instances it may be acceptable to allow residual effects to be addressed by biodiversity offset or environmental compensation. MIN O6 b encompasses all adverse effects, including MIN O6 a vi. The wellbeing of people and communities. Addressing wellbeing adverse effects through biodiversity offset or environmental compensation does and cannot compensate for people's stress due to poor sleep, children unable to walk or bike to school due to heavy traffic movements etc.</p>	
Suzanne Hills (S443)	S443.012	STRATEGIC DIRECTION	NENV - O3	Amend	<p>NENV O3 should not be at the expense of not protecting other significant natural ecosystems and habitats, particularly as most public conservation land (PCL) is at higher elevations and severely fragmented on coastal lowlands. While PCL does make up a substantial contribution, lowland and coastal ecosystems are not well-represented, particularly the important and interdependent nature of ki uta ki tai/from the mountains to the sea and river flats. Just because 84% of the West Coast is PCL, it doesn't lessen the need to protect significant natural</p>	Amend ENV - O3 to reflect that the large proportion of PCL does not lessen the need to protect significant natural heritage outside of it

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					heritage outside of it; NENV O3 reads as implying it is less necessary.	
Suzanne Hills (S443)	S443.013	STRATEGIC DIRECTION	TRM - O1	Amend	TRM O1: Supporting the development of visitor facilities and accommodation...and on public conservation land where appropriate does not align with Policy 10 Accommodation and Related Facilities of Conservation General Policy: i.e. in keeping with conservation legislation, facilities are for public recreation, education and community services, not for tourism and economic benefits.	Amend TRM - O1 to be in keeping with Policy 10 of Conservation General Policy.
Suzanne Hills (S443)	S443.014	STRATEGIC DIRECTION	STRATEGIC DIRECTION	Amend	Without this, piecemeal hydro schemes will continue to be proposed and consented without consideration of cumulative effects and how a scheme fits into the wider regional cost/benefit and best alternatives.	<b>Include a strategic objective on the development and implementation of a regional renewable energy strategy.</b>
Suzanne Hills (S443)	S443.015	Energy	ENG - P2	Amend	There is no consideration of cumulative effects of multiple small scale run-of-river hydro schemes that would result in the degradation of multiple wild rivers/creeks compared with generation benefits of larger schemes on already degraded landscapes or utility scale wind. The wild unmodified creeks and rivers of the West Coast are an asset to nature tourism, public recreation and ecosystem health and integrity. With the majority of rivers around the globe now modified in some form, we should be placing the highest value on the remaining wild creeks and rivers of the West Coast.	Amend policy to reflect the cumulative effect of multiple hydro schemes.
Suzanne Hills (S443)	S443.016	Transport	Transport	Amend	As there is no strategic objective on emission reduction, this imperative does not come through strongly in this section. A significant proportion of NZ	<b>Review this section to enable a significant reduction in regional transport emissions.</b>

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					emissions are due to transport and this needs more consideration. There could be much bolder objectives & policies enabling/supporting active transport and reducing vehicle movements. Refer submission for examples.	
Suzanne Hills (S443)	S443.017	Transport	TRN - R12	Oppose	This restricted discretionary activity applies to high trip generating transport activities defined for mining and quarrying as 30+ hvm/d. It does not consider how cumulative effects of several mining or quarrying activities (that individually may generate less than 30hvm/d) will be adequately mitigated.	<b>Reconsider this rule and TRN S14 regarding cumulative effects from heavy vehicle movements.</b>
Suzanne Hills (S443)	S443.018	Appendix One: Transport Performance Standards	TRNS14	Amend	The threshold in TRN S14 #4 of 250hvm/day is arbitrary and excessive; it should be considerably lower and explicitly state that it is cumulative of all heavy vehicle movements.	Reduce the number of heavy vehicle movements/day provided for in this standard. Explicitly identify in the standard that this is cumulative of all heavy vehicle movements on the road.
Suzanne Hills (S443)	S443.019	Natural Hazards	NHP4	Amend		<b>Amend policy to include additional point of seawater incursion into groundwater.</b>
Suzanne Hills (S443)	S443.020	Ecosystems and Indigenous Biodiversity	ECO- O1	Amend		Amend to include the words "and map"
Suzanne Hills (S443)	S443.021	Ecosystems and Indigenous Biodiversity	ECO - P1	Amend	Areas of significant indigenous vegetation are present in the Grey District that are not currently in Schedule 4 but likely meet the SNA criteria in Appendix 1 of the RPS.	The Grey District also needs to be subject to ECO P1 i to iv in order for SNAs in Grey continue to be identified and scheduled.
Suzanne Hills (S443)	S443.022	Ecosystems and Indigenous Biodiversity	ECO - P1	Amend	Identifying SNAs in Buller and Westland through the resource consent process is a haphazard and an extremely slow approach. It does not comply with Objective 1 or Policy 1 in section 7 of the RPS and the councils' obligation to protect significant indigenous	Amend to ensure that there is better control of native vegetation clearance between now and 2027 to prevent further biodiversity loss.

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					biodiversity. This is an overly permissive approach, and even though it is pleasing to see a completion timeframe of 2027, there needs to be better control between now and 2027 to prevent further biodiversity loss. It is unclear how the rules intended to restrict activities in SNAs can be effectively applied to potential SNAs yet to be identified. It puts significant ecosystems and biodiversity at risk	
Suzanne Hills (S443)	S443.023	Ecosystems and Indigenous Biodiversity	ECO - P2	Amend	ECO P2 e: has no more than minor adverse effects on the significant indigenous vegetation or fauna habitat must apply to points a-d; it is not clear that it does because of the inconsistent use of and, or & semi colon. Multiple minor adverse effects could result in a more than minor cumulative effect	Amend the policy to refer to "no more than minor <b>cumulative</b> effect"
Suzanne Hills (S443)	S443.024	Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity Policies	Support in part	ECO P3, P4, P5, P6 P7, P8 & P9: set some useful and clear considerations, but the provisions don't go far enough to give effect to the RPS.	Amend the policies to ensure that they give effect to the RPS
Suzanne Hills (S443)	S443.025	Ecosystems and Indigenous Biodiversity	ECO - P7	Amend	ECO P7 h on biodiversity offsetting and compensation are distilled from the RPS and lost some meaning	Amend the policy on biodiversity offsetting and compensation to ensure this gives effect to the RPS.
Suzanne Hills (S443)	S443.026	Ecosystems and Indigenous Biodiversity	ECO - P9	Support	the provisions don't go far enough to give effect to the RPS	Amend the policy to give effect to the RPS and the NZ Government guidance on biodiversity offsetting
Suzanne Hills (S443)	S443.027	Ecosystems and Indigenous Biodiversity	ECO - R1	Amend	This rule for Grey District leaves significant indigenous vegetation at risk from clearance since there remain areas that have not been identified as either SNAs or ONLs. The clearance rule for Buller and Westland does not exclude Outstanding Natural Landscapes, even though they have	Amend rule to remove exclusions for Grey District, ensure ONLS in Buller and Westland are included, and reduce the blanket provision for permitted clearance of 0.5ha/3 years (and 5ha/site/3 yrs for manuka, kanuka and bracken

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					been identified for these districts and are listed in Schedule 5. This is regionally inconsistent and inappropriate for a combined district plan. For Buller and Westland where SNAs have not been identified and will not be complete until 2027, the clearance rule of 0.5ha/site/3 years (outside of the Coastal Environment) leaves biodiversity at risk. The blanket rule of 0.5ha/3 years (and 5ha/site/3 yrs for manuka, kanuka and bracken	
Suzanne Hills (S443)	S443.028	Ecosystems and Indigenous Biodiversity	ECO - R1	Oppose in part	With the mandate to protect biodiversity the sanctioning of vegetation clearance to aid the removal of windthrown timber is not justified.	Delete 3.i - the provision that allows for the removal of wind thrown timber.
Suzanne Hills (S443)	S443.029	Ecosystems and Indigenous Biodiversity	ECO - R2	Oppose	Who decides if the permitted clearance disturbs, damages or destroys nesting areas or habitats of protected species. Because this is a permitted activity it is open to abuse and puts remaining coastal indigenous vegetation at risk. Again it is unclear if the 500m2 is a blanket clearance rule for any purpose, or a capping rule for the stated purposes. Point 4 puts indigenous vegetation in the Buller and Westland coastal environment at risk since SNAs are not yet identified for these districts.	Amend the rule to be clearer and address concerns in the submission around nesting areas and habitats of protected species and indigenous vegetation in the Buller and Westland district.
Suzanne Hills (S443)	S443.030	Planning Maps and Overlays	Natural Features and Landscapes	Amend	The northern limit of ONL44 cuts directly through the 79ha bush block at 3342 Coast Rd This appears to be a very arbitrary line and makes no sense. At the very least ONL44 should include the entirety of the 3342 Coast Road land parcel. But the question remains as to why ONL44 does not extend northward to Razorback Point as the landscape features north of the line	<b>Revisit north boundary of ONL44 and consider extending.</b>

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					through 3342 Coast Rd continue as described for ONL44 in Schedule 5	
Suzanne Hills (S443)	S443.031	Subdivision	Subdivision	Amend	They are very low impact, meet the needs of many and there exist opportunities to provide subdivisions for tiny house villages in or near to West Coast towns or settlements. They could include both purchase and lease of land plots for tiny houses.	<b>Review this section to enable the tiny house movement and its contribution to the sustainable use of land and resources.</b>
Suzanne Hills (S443)	S443.032	Planning Maps and Overlays	Coastal Environment	Amend	The TTPP mapping of the coastal environment is also inconsistent and sometimes plainly illogical.	Review the mapping of the coastal environment to ensure it is consistent with the NZCPS.
Suzanne Hills (S443)	S443.033	Coastal Environment	Coastal Environment	Amend	The NZCPS is inconsistently applied. Inconsistencies exist between policies and rules.	<b>Review this section to ensure consistency with the NZCPS.</b>
Suzanne Hills (S443)	S443.034	Light	LIGHT	Amend	West Coast dark skies are an asset with benefits to nature tourism, communities, wellbeing and indigenous species	<b>Consider incorporating International Dark Skies park criteria for Barrytown Flats/Punakaiki.</b>
Suzanne Hills (S443)	S443.035	Planning Maps and Overlays	Open Space Zone	Amend	The zoning of public conservation land (PCL) into district council zones is fraught with difficulties and implications. and use consenting on PCL is the responsibility of DOC and comes under conservation legalisation not the RMA. PCL already has a suitable zone name: public conservation land. Calling it something else by applying district council zoning designation is inappropriate and unnecessary.	<b>Remove district council zoning of public conservation land.</b>
Suzanne Hills (S443)	S443.036	Rural Zones	RURZ - O5	Oppose	It is unnecessary to have a mineral extraction objective and associated policies for the rural zone. All of the policy details are covered by the resource consent process and mineral extraction must remain a discretionary activity requiring resource consent in the rural zone. The Plan is biased	Delete the objective

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					towards enabling extractive industries and these objectives and rules appear as a means to avoid the resource consent process.	
Suzanne Hills (S443)	S443.037	Rural Zones	RURZ - P18	Oppose	It is unnecessary to have a mineral extraction objective and associated policies for the rural zone. The Plan is biased towards enabling extractive industries and these objectives and rules appear as a means to avoid the resource consent process.	Delete the policy
Suzanne Hills (S443)	S443.038	Rural Zones	RURZ - P19	Oppose	It is unnecessary to have a mineral extraction objective and associated policies for the rural zone. The Plan is biased towards enabling extractive industries and these objectives and rules appear as a means to avoid the resource consent process.	Delete the policy
Suzanne Hills (S443)	S443.039	Rural Zones	RURZ - P21	Oppose	It is unnecessary to have a mineral extraction objective and associated policies for the rural zone. The Plan is biased towards enabling extractive industries and these objectives and rules appear as a means to avoid the resource consent process.	Delete the policy
Suzanne Hills (S443)	S443.040	Rural Zones	RURZ - P22	Oppose	It is unnecessary to have a mineral extraction objective and associated policies for the rural zone. The Plan is biased towards enabling extractive industries and these objectives and rules appear as a means to avoid the resource consent process.	Delete the policy
Suzanne Hills (S443)	S443.041	Rural Zones	RURZ - P25	Oppose	It is unnecessary to have a mineral extraction objective and associated policies for the rural zone. The Plan is biased towards enabling extractive industries and these objectives and rules appear as a means to avoid the resource consent process.	Delete the policy.



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Suzanne Hills (S443)	S443.042	Rural Zones	RURZ - P15	Amend	he objective to ensure reverse sensitivity from new subdivisions does not compromise existing mineral extraction activities is applicable in the converse: to ensure reverse sensitivity from new mineral extraction does not compromise established residents or their activities,	<b>Rewrite to clarify that reverse sensitivity of new developments</b> from existing rural uses and consented activities encompasses all new developments, including new mineral extraction activities.
Suzanne Hills (S443)	S443.043	Rural Zones	RURZ - P24	Oppose	A mineral extraction zone and all its inherent restrictions on land use and activities should not take precedence over a long established rural zone that allows a reasonable diversity of land use, lifestyles and future options.	Delete the policy
Suzanne Hills (S443)	S443.044	General Rural Zone	GRUZ - R12	Oppose	This is an entirely inappropriate and unacceptable permitted activity in the rural zone. Even just one of these highly permissive mineral extraction activities operating to or near the limits will be significant in terms of land size, scale and impact of effects. The cumulative effects of several of these permitted activities running concurrently will be very significant.	<b>Remove GRUZ R12 and make mineral extraction a discretionary activity in the Rural Zone.</b>
Suzanne Hills (S443)	S443.045	General Rural Zone	GRUZ - R18	Oppose	Schedule 10 is blank, making this rule irrelevant.	<b>Remove and make mineral extraction a discretionary activity in the Rural Zone</b>
Suzanne Hills (S443)	S443.046	General Rural Zone	GRUZ - R25	Oppose	Even just one of these highly permissive mineral extraction activities operating to or near the limits will be significant in terms of land size, scale and impact of effects. The cumulative effects of several of these restricted discretionary activities running concurrently will be very significant.	<b>Remove and make a discretionary activity with controls in place over cumulative adverse effects from potential of multiple concurrent mining operations.</b>
Suzanne Hills (S443)	S443.047	Planning Maps and Overlays	Rezoning Requests	Amend	The 79ha block of land at 3342 Coast Road is zoned as rural but to the north and south the land parcels are zoned as rural lifestyle. The GRUZ is defined	Rezone the property at 3342 Coast Road as Rural Lifestyle Zone.

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					as: Areas used predominantly for primary production activities. This does not apply to 3342 Coast Road. The vast majority is indigenous forest and protected under a QEII conservation covenant. Only 0.3ha is excluded from the covenant - for the most part an already cleared area. This 0.3ha is the only legal site for a future dwelling under the covenant. Therefore the land parcel is essentially rural lifestyle and should be zoned as such and would be in keeping with the adjacent land parcels.	
Suzanne Hills (S443)	S443.048	Rural Lifestyle Zone	RLZ - R1	Support	This is a sensible rule, particularly 7i. If this has come about because of issues in Westland then it is potentially a regional one too; as a combined district plan it makes sense for it to apply to all districts.	<b>Amend #7 on beekeeping to including all districts</b>
Suzanne Hills (S443)	S443.049	Rural Lifestyle Zone	RLZ - R15	Oppose	Mineral extraction ranges from an artisan to industrial scale and a discretionary activity status is appropriate for industrial scale activities. For completeness, SNAs should be included in #1.	That <b>mineral extraction is a discretionary activity</b>
Suzanne Hills (S443)	S443.050	Rural Lifestyle Zone	Rules	Amend	Commercial dog kennels are not appropriate for a rural lifestyle zone with sites as small as 1ha. It is not clear in the rules where this activity sits.	<b>Commercial dog kennels are a non-complying or prohibited activity in the RLZ or the very least clarify that they do not come under a permitted or controlled activity.</b>
Suzanne Hills (S443)	S443.051	Planning Maps and Overlays	Rezoning Requests	Amend	The proposed MINZ on the Barrytown Flats does not meet the criteria for the zone. It is not an area where there is a mineral extraction activity that is currently authorised under resource consents because they were declined by independent commissioners in	Rezoning the Mineral Extraction Zone on the Barrytown Flats to Rural Zone

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					February 2022. As it does not meet the MINZ criteria, it cannot be a MINZ and must therefore remain as a Rural Zone in keeping with the surrounding rural zoned land.	
Suzanne Hills (S443)	S443.052	Mineral Extraction Zone	MINZ	Oppose	It is unnecessary and appears to be introduced in order to rip away the resource consent process. The lack of detail in Appendix 7 on Mineral Extraction Management Plans provides little reassurance regarding the complexity of the identification and management of adverse effects and compliance to plans.	<b>Remove this zoning designation from the plan.</b>
Suzanne Hills (S443)	S443.053	Buller Coalfield Zone	Buller Coalfield Zone	Oppose	This zoning is unnecessary as existing authorised activities are able to continue regardless. Currently unconsented new and expanded coal mines are entirely unacceptable for locking in continued greenhouse gas emissions and all the terrible consequences to climate stability for decades to come. Any short term economic contribution of coal mining to the region is far outweighed by the disastrous consequences.	Delete the Buller Coalfield Zone from the Plan.
Suzanne Hills (S443)	S443.054	STRATEGIC DIRECTION	STRATEGIC DIRECTION	Amend	The opportunity exists for the Plan to have a progressive approach that benefits the regional economy, social wellbeing and the environment. If the Plan had objectives and policies that committed to phasing out coal mining with no new or extended coal mines then local leadership would be in a strong position to negotiate with central government for financial support packages to transition to alternative initiatives and enterprises.	<b>Amend the Plan to enable the necessary and urgent step change to a lower emission &amp; sustainable regional economy with a clear pathway to decarbonisation</b>