



# Te Tai o Poutini PLAN

*A combined district plan for the West Coast*

## Te Tai o Poutini Plan Committee Meeting To be held via Zoom 29 April 2022 AGENDA

<b>9.45</b>	Welcome and Apologies	<b>Chair</b>
	Confirm previous minutes	<b>Chair</b>
	Matters arising from previous meeting	<b>Chair</b>
<b>9.50</b>	Financial Report	<b>Senior Planner</b>
<b>10.00</b>	Technical Report – Ecosystems and Biodiversity	<b>Principal Planner</b>
<b>10.20</b>	Technical Report – General Rural Zone Subdivision and Density in the General Rural Zone	<b>Principal Planner</b>
<b>10.50</b>	Break	
<b>11.00</b>	Technical Report – Mineral Extraction	<b>Principal Planner</b>
<b>11.40</b>	Technical Report – Corrections to Feedback Report	<b>Principal Planner</b>
<b>11.45</b>	Technical Report – Zoning of Public Conservation Land	<b>Principal Planner</b>
<b>12.00</b>	Technical Report – Outstanding Natural Landscape and Coastal Natural Character Mapping and Accompanying Brown Report	<b>Principal Planner</b>
<b>12.20</b>	Project Manager’s Report	<b>Senior Planner</b>
<b>12.30</b>	<b>Meeting Ends</b>	

### Meeting Dates for 2022

<b>May</b>	Tuesday 17th, 9.30 - 12.30pm	Buller District Council
<b>June</b>	Tuesday 21 <sup>st</sup> , 9.30 -12.30pm	West Coast Regional Council
<b>December</b>	Thursday 15 <sup>th</sup> , 9.30 -12.30pm	Grey District Council

**THE WEST COAST REGIONAL COUNCIL**

**MINUTES OF MEETING OF TE TAI O POUTINI PLAN COMMITTEE  
HELD ON 29 MARCH 2022  
HELD VIA ZOOM  
COMMENCING AT 10:30 A.M.**

**PRESENT:**

R. Williams (Chair), T. Gibson, B. Smith, L. Martin, L. Coll McLaughlin, A. Becker, A. Birchfield, P. Madgwick, F. Tumahai, S. Roche, J. Cleine

**IN ATTENDANCE:**

J. Armstrong (Project Manager), L. Easton (WCRC), R Vaughan (WCRC), H. Mabin (WCRC), P. Morris (GDC), S. Bastion (WDC), S. Mason (BDC), F. Scadden (WDC)

**Welcome**

The Chair welcomed everyone to the meeting.

**Apologies**

There were no apologies from Committee members. The Chair advised the Committee that Edith Bretherton is on leave and is an apology for this meeting.

**Confirmation of Minutes**

**Moved** (Gibson / Becker) *that the minutes of the meeting dated 17 February 2022 be confirmed as correct.*

*Carried*

**Matters Arising**

There were no matters arising.

**Declarations of Interest**

There were no declarations of interest.

**Financial Report**

J. Armstrong spoke to this report. Mrs Armstrong noted there were variations from this year's budget arising from a change in research costs. Mrs Armstrong described changes in the draft budget for next year, to take account of feedback received. The Committee was advised that a submissions tool may be purchased in this financial year, to allow time to set it up in preparation for the submissions period next year. Further budget is also likely to be required for additional planning and peer review resources, which will impact on the current financial year.

**Moved** (Tumahai / Gibson) *That the Committee receives the report.*

*Carried*

**Te Tai o Poutini Plan: Consultation on Coastal and Land Instability Natural Hazards**

J. Armstrong made some initial comments on the report, emphasising that the provisions are draft only, and noting they got really useful feedback from the community on this initial stage of the process.

L. Easton made initial comments on the report.

Mayor Cleine asked about revisiting the timelines on the public consultation for this section of the draft. His view was that this should not be compressed and that the community is under stress at present. Cr Birchfield agreed, noting that more assessment should be done. In response to a question from Cr Becker, L Easton explained that in order to comply with RPS and NZCPS requirements, and noting that some detailed work had been done but not for all areas, the proposal was to carry forward existing hazard buffer /setback areas in to the new draft Plan.

Mayor Cleine felt that the timeframe for doing the specific data analysis may not be realistic given the overall timeframe for the plan. Mayor Smith raised the question of the potential cost implication of delay, but supported the idea of taking a bit longer on the development of the provisions. J Armstrong advised of some of the implications of delay in relation to workload and upcoming introduction of new planning legislation.

Cr Birchfield felt that a lighter hand could be taken given the extensive length and area of the coastline, suggesting geotechnical reports may not be necessary, and to go out to consultation on that basis. R Vaughan confirmed that much of the LiDAR for the Coast had been done but that there was still some work on processing the data to be completed.

P Madgwick asked about the science behind the basis for the predictions of sea level rise, and noted he was ambivalent about extending the timeline for the process. L Easton advised that the government has provided the required standards which Regional Councils must comply with, and they have no choice around that.

The Chair asked for any comment about the land instability document. Mayor Cleine commented that the Buller Council was already familiar with these areas and the challenge might be to ensure the community was aware of them also.

**Moved** (Birchfield / Gibson)

1. *That the Committee receive the report.*

*Carried*

There was further discussion on the Draft Coastal Natural Hazard document, and whether to delay the consultation. It was suggested by Cr Challenger, and supported by Cr Becker, P Madgwick and Mayor Smith, that a coastal setback of 100m be put out for consultation as a proposal.

F Tumahai noted his view that the consultation should be proceeded with. There was some discussion on whether the provisions for Westport should be delayed, to provide time for further work on those to ensure that the Westport community had accurate information and relevant provisions on which to comment. L Easton felt that without information on where the Westport flood protection wall would be located and the effects of that, the benefits of consultation with Westport residents may be limited. This was in light of clear feedback from Westport residents who wanted to know what the impacts of the wall would be on any provisions. Cr Birchfield and Cr Becker agreed with Mayor Cleine that delay would be more appropriate for Westport.

Staff will redraft coastal provisions to include a 100m setback for consultation.

**Moved** (Gibson / Tumahai)

2. *That the Committee approve the consultation for the Draft Coastal Natural Hazard Document and maps for the region except Westport; and that consultation with the Westport area be undertaken when further meaningful information is available.*

*Carried*

### **Te Tai o Poutini Plan: Feedback on the Draft Plan**

L. Easton spoke to this report, and noted how great it was that they received a lot of feedback on the draft Plan, and that submitters provided detailed feedback and comment which was really appreciated. L Easton advised that she had provided brief summaries of the feedback and a basic analysis in Appendix 1 to her report. For the issues which they received a lot of feedback on, the planners will prepare separate reports on those substantive matters to bring back to the Committee. These matters include mineral extraction, ecosystems and biodiversity, noise, general rural subdivision, natural hazards, noise, and zoning of public conservation estate. There was also a lot of feedback on Westport flood hazard and zoning, and Franz Josef zoning. These would also have separate reports brought back to the Committee at a later meeting. There was some feedback provided on visitor accommodation, and L Easton suggested that some information was provided publicly on existing use rights which may address those concerns. Ms Easton further advised the Committee that further peer review and editing is also planned for the document.

F Tumahai asked a question about the proposed staff recommendation against the rezoning of Fitzherbert Street, Hokitika, noting that it didn't make sense. L Easton advised that they had sought feedback from the respective Council's planners on any requests for rezoning, and that Westland DC planners had provided feedback and reasons. F Scadden from Westland DC provided further information.

Mayor Smith subsequently agreed that this did not make sense and the Chair asked him to take the matter to his Council for consideration.

P Madgwick asked about ONL mapping and when the Committee would get to see those maps. L Easton advised that she would make the report available to the Committee members. The Chair confirmed that L Easton would provide a summary to the May Committee meeting, and noted his gratitude for the large amount of work the planners had put in to preparing Appendix 1 of the report in a short time.

**Moved** (Cleine / Gibson)

1. *That the Committee receive the report.*
2. *That the Plan be amended as a result of feedback in accordance with the summary provided in Appendix One of this report.*
3. *That the Plan be amended as a result of the feedback from the Plan Integration, Rule Consistency and Drafting Review and to amend any errors identified in the Plan through this process.*
4. *That the Plan maps be amended as a result of the technical peer reviews of the natural hazard overlays and reassessment of natural landscape and natural character overlays.*

*Carried*

### **Te Tai o Poutini Plan: Consultation on proposal to incorporate material by reference**

J. Armstrong spoke to this report, noting this was a mandatory stand-alone matter required to be consulted on. Cr Challenger sought clarification as to whether the Westland DC Code of Practice for

works was still current. F Scadden from Westland DC clarified that it was still in use when needed. Mayor Cleine asked whether the Plan included some information about the requirement to comply with higher order documents such as the RPS and national standards, as he thought it would be good for people to be clear on this. L Eason replied that this would be included in the front part of the Plan, noting that most people don't read this section and that plain language information will also be released when the Plan is notified, to support understanding.

**Moved** (Gibson / Becker)

1. *That the Committee receives the report; and*
2. *That the Committee approve the consultation for "technical documents incorporated by reference".*

*Carried*

### **Project Manager's Report**

J. Armstrong spoke to her report. She advised that as part of the recent process on the exposure Draft Plan staff had run a number of zoom meetings and had 9 drop-in sessions, and had responded to requests from the Ross and Franz Josef communities for community meetings in those locations. F Scadden also attended all the Westland meetings which was appreciated by the team. J Armstrong drew the attention of the Committee to some previous minor wording inconsistencies which she had corrected in the public agenda, to make sure it was clear as to meeting dates.

**Moved** (Williams / Roche) *That the report is received.*

*Carried*

### **GENERAL BUSINESS**

J Armstrong asked the Committee members what their view was of continued zoom meetings, or whether they wanted to meet in person at the next meeting on 29 April at Westland District Council, as originally planned. The Chair supported meeting in person, and noted it would be up to Westland Council to determine in terms of their protocols whether that was possible at that time. The Committee supported this, and the Chair advised that the meeting would be held in person at WDC unless they hear otherwise. J Armstrong indicated she would contact the Committee members closer to the time to confirm that.

The meeting closed at 12:05 p.m.

The Chair thanked everyone for their attendance.

### **NEXT MEETING**

Friday 29 April 2022 at Westland District Council.

.....  
Chair

.....  
Date



# Te Tai o Poutini PLAN

*A combined district plan for the West Coast*

Prepared for: Te Tai o Poutini Plan Committee

Prepared by: Jo Armstrong, Project Manager

Date: 29 April 2022

Subject: March 2022 Financial Report

---

## SUMMARY

This report includes the statement of financial performance to 31 March 2022.

## RECOMMENDATION

1. That the Committee receive the report
2. That the Committee approve the \$25,000 variation to the contract with Kereru Consulting for additional hours through to 30 June 2022 be signed by the Chief Executive, West Coast Regional Council.

## REPORT

The statement of financial performance shows that costs are behind those expected, with a reported deficit of **(429,869)** compared with a budgeted deficit of **(755,743)**. This is largely due to a variance with the Research costs which has resulted in a favourable variance against budget of **\$325,874** for the year to date.

1. The March report indicated that the total positive forecast variance had been reduced due to an increased need for external consulting services to provide peer review of some natural hazards provisions, and planning services to proof read the Proposed Plan and ensure consistent integration across the Plan. These two pieces of work are currently underway, and further planner expertise is likely to be required to support delivery of the section 32 report alongside the Proposed Plan at notification. This additional work may reduce the positive forecast variance further.
2. In addition, the Principal Planner has been working fulltime on TTPP since the draft Plan was published, and it is clear that this level of input will be needed through to Plan notification. Our current contract with Kereru Consulting is for 24 hours per week, and the extra hours for the remainder of the financial year will come at an additional cost of \$25,000 + GST. We are seeking Committee approval to vary this year's contract to account for the additional hours and cost. This cost has been captured in the forecast variance in the Statement of Financial Performance below.
3. As previously mentioned we will be using a purpose-built RMA submissions tool for the Proposed Plan. The set-up cost of \$1880 will be incurred in this financial year, and there is a monthly fee of \$495 while the tool is in use. This amount may be covered by underspends in other areas, and has not been specifically included in the Statement of Financial Performance.

4. The accumulated deficit (or borrowing requirement) at the end of the period is \$612,979.

#### Te Tai o Poutini Plan

Statement of financial performance to March 2022						
	Year to date			Full year		
	Actual	Budget	Variance	Forecast	Budget	Variance
<b>INCOME</b>						
Targeted Rate	371,247	375,000	(3,753)	500,000	500,000	-
	<b>371,247</b>	<b>375,000</b>	<b>(3,753)</b>	<b>500,000</b>	<b>500,000</b>	<b>-</b>
<b>EXPENDITURE</b>						
Employee costs	210,755	187,500	(23,255)	285,000	250,000	(35,000)
Consultant Planner	86,111	75,000	(11,111)	125,000	100,000	(25,000)
Governance	48,750	48,750	-	65,000	65,000	-
Poutini Ngai Tahu	37,500	37,500	-	50,000	50,000	-
TTPP Website	3,980	2,500	(1,480)	5,000	5,000	-
Isovist e-plan Platform	8,125	8,125	-	10,833	10,833	-
Research	247,649	554,250	306,601	435,000	590,000	155,000
Engagement Travel & Accomm	5,385	11,500	6,115	15,000	15,000	-
Workshops & Events	-	1,500	1,500	3,000	3,000	-
Design & Printing	5,600	2,500	(3,100)	8,000	5,000	(3,000)
Media Costs	11,249	12,500	1,251	25,000	25,000	-
Mail Outs	-	20,000	20,000	-	20,000	20,000
Legal Advice	23,515	15,000	(8,515)	50,000	50,000	-
Hearings	-	-	-	-	-	-
Mediation	-	-	-	-	-	-
Environment Court	-	-	-	-	-	-
Interest	-	41,618	41,618	16,272	55,491	39,219
Share of WRC						
Overhead	112,500	112,500	-	150,000	150,000	-
	<b>801,116</b>	<b>1,130,743</b>	<b>329,627</b>	<b>1,243,105</b>	<b>1,394,324</b>	<b>151,219</b>
<b>Net Surplus / (Deficit)</b>	<b>(429,869)</b>	<b>(755,743)</b>	<b>325,874</b>	<b>(743,105)</b>	<b>(894,324)</b>	<b>151,219</b>

#### Accumulated deficit / borrowing requirement

Start of year	183,110	183,110
During period	429,869	743,105
<b>End of period</b>	<b>612,979</b>	<b>926,215</b>



# Te Tai o Poutini PLAN

*A combined district plan for the West Coast*

Prepared for: Te Tai o Poutini Plan Committee  
Prepared by: Lois Easton, Principal Planner  
Date: 29 April 2022  
Subject: **Te Tai o Poutini Plan – Ecosystems and Biodiversity**

---

## **SUMMARY**

This report brings back the draft Plan feedback on the issue of Ecosystems and Biodiversity.

The report considers the range of feedback on the objectives, policies, rules and definitions, alignment with the West Coast Regional Policy Statement (RPS) as well as the overall approach to significant natural area (SNA) identification within the Plan.

## **RECOMMENDATIONS**

1. That the Committee receive the report.
2. That the Ecosystems and Biodiversity Chapter be amended in accordance with the approach outlined in the report.

Lois Easton

**Principal Planner**



## INTRODUCTION

1. The exposure draft Te Tai o Poutini Plan was made available to the public on 26 January 2022. A series of consultation meetings and drop in sessions were undertaken over late February. Feedback on the draft was able to be provided until 11 March and an overview of this and proposed responses was considered at the 29 March meeting of the Committee for discussion and decision around amendments to the draft Plan.
2. 25 people and organisations provided feedback on the Ecosystems and Biodiversity provisions. Because this is a such a significant matter, with such a wide ranges of feedback, this report brings the feedback back and seeks direction from the Committee on these matters.

## DRAFT TTPP APPROACH

3. As required by the National Planning Standards, the draft TTPP considers matters of indigenous vegetation and fauna management within the Ecosystems and Biodiversity Chapter. Alongside two objectives and 9 policies, there are a cascade of rules across the Permitted – Controlled- Restricted Discretionary and Discretionary Activities. In the Grey District a core component of the rule framework is the identification of SNAs. Within Westland and Buller a “general” vegetation clearance approach is taken, as SNAs have not been identified.

## CONSULTATION

4. Because of the significance of the topic, specific consultation Zooms with key stakeholders were held so that they could ask questions in relation to plan provisions. In relation to the Grey SNA identification, a letter was sent to every affected landowner advising them of the draft Plan provisions and the feedback process. Several landowners attended the drop in session at the Grey District Council.

## FEEDBACK ON THE DRAFT TTPP

5. 27 individuals and stakeholder organisations provided feedback on the Ecosystems and Biodiversity provisions. Alongside this there was feedback provided at the drop in sessions and also through the Zoom stakeholder meetings.
6. This feedback is outlined in Appendix One. There are a number of key themes to the feedback and this is summarised in the table below.

Theme	Feedback
Grey SNAs	<p>There was feedback from five people specifically in relation to the Grey SNAs.</p> <ul style="list-style-type: none"> <li>• Four of these were landowners with SNAs with three of the landowners supporting the identification of the SNA on their property and one seeking a copy of the s32 analysis.</li> <li>• The other feedback received also supported the Grey SNAs being included in the Plan.</li> </ul>
SNA identification in Buller and Westland	<p>One organisation expressed support for the draft plan approach but 16 people and organisations sought that SNAs be identified within Buller and Westland as part of the Plan process and not be left to the resource consent stage.</p> <p>There were several key points to the feedback seeking SNAs to be identified in Buller and Westland.</p> <ul style="list-style-type: none"> <li>• That the Permitted Activity rules could enable significant areas to be cleared – and that SNAs need to be identified so they are excluded from Permitted Rules</li> <li>• That not identifying SNAs in Buller and Westland places an onerous requirement over landowners to undertake the assessment at the time of any resource consent.</li> <li>• That the lack of certainty about the location of SNAs makes it difficult for infrastructure providers and landowners to manage the effects of their activities.</li> </ul>

	<ul style="list-style-type: none"> <li>• Identification and mapping of SNAs is a requirement of the West Coast Regional Policy Statement that TTPP is required to give effect to.</li> </ul>
Policy Changes	<p>A range of amendments to the policies were sought. The key points from the feedback are:</p> <ul style="list-style-type: none"> <li>• Add "protection" into Objective 1</li> <li>• Clearer protection of species that are totally protected under the Wildlife Act in policy</li> <li>• Policies need to address Maintenance of indigenous biodiversity (s31)</li> <li>• Policies need amendment to give effect to the RPS including by identifying that SNAs should meet the criteria in the RPS</li> <li>• Policies should recognise the value of lowland forest ecosystems</li> <li>• Mixed views on biodiversity offsetting (from total opposition to support) – also feedback seeking greater consistency with the RPS</li> </ul>
Rule Changes	<p>A range of amendments to the rules were sought. The key points from the feedback are:</p> <ul style="list-style-type: none"> <li>• Amendments seeking that activities should not put protected wildlife or indigenous threatened species at risk</li> <li>• ECO-R1 and R2 are considered by several submitters to be too permissive for Buller and Westland, or too permissive coast-wide and that effects will be more than minor – particularly in relation to lowland forest remnants, however these rules are also supported by other submitters</li> <li>• Need for some standards to go alongside removal of windthrown timber – as some removal methods can have significant adverse effects</li> <li>• Need for permitted activities to have a maximum cleared area – not be additive</li> <li>• Identification that a standard "per site" clearance approach may not be appropriate where there are small sites (e.g. in Settlement or Residential areas)</li> <li>• Minerals sector submitters seek a lower level of restriction within the the Mineral Extraction Zone, than applies for other activities and a clear consenting pathway where minerals activities occur within SNAs and ONLs</li> </ul>
Definition Changes	<p>Key amendments sought</p> <ul style="list-style-type: none"> <li>• Altering the definition of SNA to align with the WCRPS and to include reference to Schedule 4</li> </ul>

## DISCUSSION

### *General Policy Approach – SNAs in Grey/General Vegetation Clearance in Buller and Westland*

7. The Ecosystems and Biodiversity topic is acknowledged to be one of the most contentious in the draft TTPP. Generally the feedback on the policy provisions are largely supportive, subject to a range of relatively minor amendments.
8. However the lack of identification of SNAs in Buller and Westland is exceedingly problematic. As has been previously discussed at the Committee this is ultra vires (not in accordance with the law) – specifically in that the West Coast RPS requires SNA identification. This will make defending these draft provisions difficult, and there is a high likelihood that their identification will eventually be forced onto the WCRC and TTPP Committee by the Court.
9. However the identification of SNAs in Buller and Westland is now not possible to be undertaken prior to notification of the proposed TTPP.
10. In order to address the feedback, and to take some steps towards meeting the West Coast RPS requirements it is recommended that a Policy 1 (how SNAs will be identified) be amended to

specifically state that a district wide process for SNA identification will be undertaken in Buller and Westland with a clear timeframe under which such identification will be undertaken. A timeframe of 5 years from Plan Notification to undertake this work is suggested to be included in the policy.

#### *Grey SNAs*

11. All landowners who own land with a Grey SNA on it were sent a letter to advise them that the SNAs were being included in the draft TTPP. While only four landowners have provided written feedback, there was also good attendance by SNA landowners to the drop in session in Greymouth. Generally the combined feedback is that the approach is largely supported by landowners.

#### *Objectives and Policies*

12. There are a range of changes sought to policies and objectives, many of which are not substantive in terms of their change in intent and generally it is proposed to accept these where possible.
13. There was a range of feedback seeking that the policies be worded more in alignment with those of the West Coast RPS. In originally drafting the policies the technical team had not wanted to include the complexity of wording found in the RPS – where many ecological terms are used. Given however that the feedback from stakeholders across the spectrum seeks greater alignment in wording it is recommended that this is undertaken.
14. In terms of making the policies more or less “protective” or “enabling” no changes are recommended as it is considered there is fair balance in the current wording.
15. In terms of the matters of protection of threatened species and lowland ecosystems, these are matters that it is recommended are expanded on in the policy. In the case of Grey District, almost all of the identified SNAs are lowland ecosystems and this was a key objective (to protect threatened ecosystem types) in the SNA identification process in that district.

#### *Rules*

16. The key focus of feedback is the Permitted Activity rules, with a strong theme that they are too permissive, or insufficiently prescriptive to meet RMA tests. Staff have considered the feedback and arguments carefully and consider that there are some changes that should be made to make the provisions more robust. Specifically:
  - a. Make reference to, and make provisions less permissive where this is clearance of the habitats of threatened species and land environments – and provide for these areas to be identified in an Appendix. While the Councils do not hold the information on locations of key threatened species as this is generally the remit of DOC, DOC has been approached to provide information for the appendix, which could be incorporated through a submission on the proposed Plan. This would better align the Permitted Activity standards with the RPS.
  - b. Include some standards alongside the removal of windthrown timber to mitigate any effects so they are less than minor.
  - c. Review the Permitted Activity “exemptions” from the maximum 5000m<sup>2</sup>/3 years so that activities that are likely to be confined to a single site (as opposed to activities such as tracks that are undertaken in a corridor) are excluded from the exemption.
17. It is not recommended to provide for exemptions or reductions in stringency of rules specifically for particular activities or zones where these activities are not identified in National Direction such as an NPS or NES. However advice notes are recommended to be used to cross reference specifically to the Mineral Extraction and Connections and Resilience Strategic Objectives.
18. It is recommended to combine Rule 1 and Rule 2 – these were kept separate in the draft mainly to highlight the differing approach in the three districts.

#### **RECOMMENDED CHANGES TO THE DRAFT TTPP**

19. Based on the discussion above the following amendments are recommended to the ecosystems and biodiversity provisions in the draft TTPP:
  - a. Amend Policy 1 to state that a district wide process for SNA identification will be undertaken in Buller and Westland within 5 years of Plan Notification.

- b. Minor amendments to objectives and policies where these do not change the substantive direction of the provision
- c. Amend policies to better reflect RPS wording.
- d. Include advice notes that specifically reference the mineral extraction and connections and resilience strategic objectives from Rules.
- e. Make reference to, and make Rules less permissive where this is clearance of the habitats of threatened species and land environments – and provide for these areas to be identified in an Appendix.
- f. Include some standards alongside the removal of windthrown timber to mitigate any effects so they are less than minor.
- g. Review the Permitted Activity “exemptions” from the maximum 5000m<sup>2</sup>/3 years so that activities that are likely to be confined to a single site (as opposed to activities such as tracks that are undertaken in a corridor) are excluded from the exemption.
- h. Amend the definition of significant natural area to align with that in the RPS.

## Appendix One: Summary of Feedback Received on Open Space and Recreation Zones and Zoning of PCL

Name/Organisation	Sub Topic	Feedback
Mark Hurst	Grey SNAs Rules	<ul style="list-style-type: none"> <li>• Support Grey SNAs</li> <li>• Provide more detailed information on the SNAs to help explain their values for landowners.</li> <li>• Provide for walkways and other conservation activities in SNAs</li> <li>• Provide for more information around what is needed for ecological studies to support resource consents.</li> <li>• Clearly identify what is and isn't permitted in an SNA</li> </ul>
Don and Dianne Bradley	Grey SNAs	<ul style="list-style-type: none"> <li>• Support the draft Grey SNA approach</li> </ul>
John McKinnon	Grey SNAs Rules	<ul style="list-style-type: none"> <li>• Supports SNA on his land</li> <li>• Seeks to be able clear a small area (footprint 120m<sup>2</sup> ) for a bach – recognising there is currently no building on the property.</li> </ul>
West Coast Penguin Trust	Policy Rules	<ul style="list-style-type: none"> <li>• Seeks that Objective 1 be amended to include protection of all species absolutely protected under the Wildlife Act 1953.</li> <li>• Seeks policies be amended to take into account s31 of the RMA to “maintain indigenous biodiversity” – with either P3 or P7 being amended, or a new policy which specifically relate to protected wildlife.</li> <li>• Seeks amendment to the Rules to ensure that any activity, Permitted, Controlled, Restricted Discretionary or Discretionary, cannot put protected wildlife at risk, whether or not the vegetation is significant, indigenous or otherwise.</li> </ul>
Kathy Gilbert	Policy Rules Buller/ Westland SNAs	<ul style="list-style-type: none"> <li>• Considers the chapter is overly permissive and does not give effect to s6 or s31 of the RMA</li> <li>• Seeks that ECO - P7 be amended to give effect to the RPS</li> <li>• Considers that ECO - R1 is too permissive for Buller and Westland - standards are too ambiguous - particularly clearance for building/access/parking where no dwelling, Removal of windthrow timber needs to define methods and location and 5000m<sup>2</sup> clearance/3 years is too permissive.</li> <li>• Considers that using the consenting process to establish significant biodiversity is inappropriate - particularly in mineral extraction zones.</li> <li>• SNAs should be identified in Buller and Westland</li> </ul>

NZ Coal and Carbon		<ul style="list-style-type: none"> <li>• The Significant Natural Areas (SNA) and Outstanding Natural Landscapes (ONL) provisions will have legal effect upon notification. Many of these provisions and overlays will apply to mineral extraction activities both within and outside of the Mineral Extraction Zone. We seek a consenting pathway and access to the management or mitigation hierarchy for our current and future activities such that they are not unnecessarily restricted.</li> <li>• ECO - O2, ECO-P2 and ECO – P6 should allow for mitigation</li> <li>• ECO – R1 and R2 should specifically provide for lawfully established activities</li> </ul>
Inger Perkins	Policy Rules Buller/ Westland SNAs	<ul style="list-style-type: none"> <li>• Considers that the chapter needs to emphasise the value of lowland forest ecosystems, which are underrepresented and easily lost or diminished through permitted clearance rules.</li> <li>• Seeks that ECO-O1 –should be extended to add `protect`, thus: To protect and maintain the range and diversity of ecosystems and indigenous species found on the West Coast/Tai o Poutini.</li> <li>• ECO-P7 and ECO – P4 should also be extended this to protect species, e.g., The impact of the activity on protected wildlife and how any potential impact could be avoided, remedied or mitigated.</li> <li>• ECO P9 – seeks in relation to biodiversity offsets that TTPP needs to be clear on which guidance and that it is sufficiently robust.</li> <li>• ECO – R1 - 5000m<sup>2</sup>/3 years could mean death by a thousand cuts to lowland forest remnants. Considers that such permitted activity has no justification in the context of protecting indigenous vegetation and habitat as required by section 6 of the RMA - “areas of significant indigenous vegetation and significant habitats of indigenous fauna are protected”. Some means to protect more valuable areas needs to be found and implemented.</li> <li>• ECO-R1 as drafted allows for the clearance of indigenous vegetation when it is the removal of windthrow timber. When DOC explored the adverse effects of removing windthrow timber, one of the clear early findings of Manaaki Whenua Landcare Research, acting in a consulting capacity, was that a significant and long lasting potential impact on the forest was the compaction of forest soil by vehicles carrying out the removal. Such removal by vehicle was only allowed when adjacent to existing tracks; removal was otherwise carried out by helicopter. This adverse effect needs to be taken into account in this rule.</li> </ul>
Frida Inta	Policy	<ul style="list-style-type: none"> <li>• Seeks two new objectives – one to recognise the benefits of ecosystem services and one that relates to natural character</li> <li>• Opposes Policy 1 as being insufficient for protection of biodiversity</li> <li>• Seeks Policy 2 be amended so that there are no adverse effects on SNAs</li> <li>• Seeks Policy 3 be amended to refer to natural indigenous character and Seeks clarification of wording around additional subdivision rights</li> <li>• Opposes Policy 4</li> <li>• Opposes Maori considerations in Policy 5</li> <li>• Policy 6 – seeks reference to the information in Appendices 1 and 2 of the RPS</li> <li>• Policy 7 – seeks reference to the resource consent process rather than subdivision, use and development</li> </ul>

		<ul style="list-style-type: none"> <li>• Rule 1 – seeks that no mature trees be felled as part of permitted walking tracks, Opposes 5ha per site – as some sites are old ¼ acre sections, would like to see 15 years for manuka/kanuka/bracken reduced to 10 or 5 years, permitted maximum clearance needs to be tightened</li> <li>• ECO R-6 – if SNA spans more than 1x 4000m<sup>2</sup> allotment is too restrictive</li> <li>• Seeks that the chapter recognise Section 31 of the RMA and protects indigenous biodiversity that is not recognised or classified as an SNA</li> <li>• Clearance for utilities needs conditions as such clearance can be destructive</li> <li>• Opposes permitted fencelines within an SNA</li> </ul>
Federated Farmers	Buller/ Westland SNAs	<ul style="list-style-type: none"> <li>• FFNZ supports the principle of a planning approach that identifies SNAs using robust methodology and targeted land use controls as being more appropriate than general catch all rules which elevate all indigenous vegetation to a significance status until proven otherwise.</li> <li>• We are concerned for areas in Buller and Westland where the SNA mapping has only occurred at a desktop level, that now the approach is for SNA's to be ground truthed when landowners apply for a resource consent.</li> <li>• From looking at other councils methodology, there are various methodologies for Council to meet their s6 obligations under the RMA. We would request that the Council ensure that the process is not a cost burden on the landowner.</li> <li>• We would also like to see more information made available to landowners as to what criteria their sites meet.</li> </ul>
Michael Orchard	Grey SNAs Buller/ Westland SNAs	<ul style="list-style-type: none"> <li>• I fully support the provision and evaluation of Grey District SNA's</li> <li>• Buller and Westport Districts should include identification of SNAs</li> <li>• Identify some specific locations as SNAs</li> <li>• Seeks that DOC biodiversity values be included in the Plan</li> </ul>
Greg Maitland	Buller/ Westland SNAs Rules	<ul style="list-style-type: none"> <li>• ECO R1 Indigenous Vegetation Clearance – opposes the rule as the identification of SNAs has not been undertaken in Buller and Westland and the costs of SNA identification will lie with landowners.</li> <li>• In regards to ECO- R1, X.5 Removal of Bracken , Manuka , Kanuka under 15 years old . There should also be provision for the acceptance of a signed affidavit from a seperate witness for verification. As photographic evidence may not be verifiable . Bracken for example can be cleared on year and grow back the next showing no difference.</li> <li>• No 6 I agree with the right to remove wind-throw timber.</li> <li>• No 7 I would like this to be extended to 1 Hectare over 3 years if the natural vegetation has ben cut over or previously logged and is an altered non pristine state . verifiable by witnessed affidavits and recent photographs.</li> </ul>
Brian Anderson	Policy	

	Rules Westland/ Buller SNAs	<ul style="list-style-type: none"> <li>• Policy - All mention of biodiversity offsetting should be removed from the plan.</li> <li>• Rules All indigenous vegetation clearance should be a Discretionary Activity Permitted and controlled rules for indigenous vegetation removal should be removed. They are undesirable because of the biodiversity and climate change implications, and untenable without identification of Significant Natural Areas.</li> <li>• The TTPP fails to identify SNAs in Buller and Westland but one of the fundamental requirements under s6 of the RMA. Maps of potential SNAs should be included within the Plan.</li> </ul>
DOC	Objectives Rules Definitions	<ul style="list-style-type: none"> <li>• ECO – O4 should include reference to maintaining the extent of indigenous biodiversity.</li> <li>• Amend definition of SNA to align with the WCRPS.</li> <li>• Permitted rules are too permissive</li> <li>• Identify areas of kiwi habitat that may require additional protection from residential development and pests.</li> <li>• Permitted vegetation clearance of up to 5,000m<sup>2</sup> per site can be undertaken in accordance with rule ECO - R1 and ECO - R2 without verifying what type of vegetation is being removed with the exception of manuka, kanuka and bracken. These rules should exclude clearance of indigenous threatened species to give effect to Policy ECO - P6.</li> <li>• Delete the permitted activity standard that allows clearance for building, access, parking and manoeuvring where no practical alternative development area as is not enforceable.</li> <li>• The way the rules are drafted it is not clear if the 5,000m<sup>2</sup> limit for permitted clearance applies to this activity or the likes of the construction of up to 2.5m wide cycling tracks and new fences.</li> <li>• All these activities potentially could require large scale vegetation clearance and there needs to be clarity of the limits that apply within the permitted activity rules.</li> <li>• There is a permitted activity to remove windthrown trees but no caveat of the damage which could be inflicted as part of the extraction process.</li> <li>• Manuka/kanuka are now all threatened species because of the risk posed from myrtle rust. The rules specific to removal of manuka/kanuka may therefore be in conflict with the assessment criteria for SNAs. This was addressed in the draft NPS-IB by excluding natural areas of manuka/kanuka where the myrtle rust qualifier was the only trigger for the SNA to be identified. The Department would be comfortable if the same wording in the draft NPS-IB was used.</li> <li>• This vegetation type could also occur in pakihi wetland and it would be important make the point clearly in the Plan that while it may be a permitted activity to clear this vegetation in certain circumstances, the Resource Management (National Environmental Standards for Freshwater) Regulations 2020 contains controls on the clearance of vegetation and earthworks within natural wetlands.</li> </ul>
Garry Hill	Buller/ Westland Rules	<ul style="list-style-type: none"> <li>• ECO measures to manage vegetation clearance in Buller and Westland are too vague and permissive.</li> </ul>



Linda Grammer and Ian Mulholland	Policy Rules Buller/ Westland SNAs	<ul style="list-style-type: none"> <li>• Insufficient emphasis on Biosecurity in the draft Plan..</li> <li>• GE/GMOs (Genetically Modified Organisms) Genetically Modified Organisms/ Gene Drive should be addressed in the Plan</li> <li>• The polices with clear direction to protect threatened and at risk species are good ECO - Policy 7 sets some useful and clear considerations, but the provisions don't go far enough to give effect to the West Coast Regional Policy Statement.</li> <li>• The rule framework in the ECO chapter is overly permissive and does not appear to give effect to the RMA s 6 or s 31</li> <li>• ECO - R1 is concerning, where SNAs have not yet been identified and mapped (in Buller and Westland districts). The permitted activity standards are too permissive and lack clarity, for example : It is clearance for building, access, parking and manoeuvring areas where there is no practical alternative development area on the site – who decides? It is the removal of windthrow timber – does not specify how or where It is a maximum area of 5000m2 per site, in total, over any continuous three year period – seems to apply anywhere, including in a potential SNA</li> <li>• Relying solely on consenting process leaves unidentified significant biodiversity at risk and will result in ad-hoc and in many cases only partial identification of significant areas.</li> <li>• It is not clear how the rules which are intended to restrict activities in such areas can be effectively applied with this approach. .</li> </ul>
Beef and Lamb	Buller/ Westland SNAs	<ul style="list-style-type: none"> <li>• Raise concerns about the indigenous vegetation clearance provisions and the perverse outcomes this may result in. Specifically, where landowners will be required to obtain resource consent for vegetation clearance and require an assessment against a regionally consistent significance criteria, the outcome of which will determine whether their land is added to Schedule 4.</li> </ul>
Ted Brennan	Westland SNAs	<ul style="list-style-type: none"> <li>• In Central Westland there are only 3 remaining areas of remnant Coastal Kowhai forest. The best remnants includes one area on south side Waitaha River, along both sides of Ounatai Creek as far as Duffers Creek Lagoon. Another site in the Totara Lagoon area, has kowhai forest from Frenchies Island and along both sides of Gow Creek almost a far as the West Coast Wilderness Cycleway (old Ross to Ruatapu railway). The 3rd area is at Donoghues south of Ross and is adjacent to the northern Mikonui Lagoon - a Schedule 2 wetland. This area is at most risk of loss through development/mining/lack of care.</li> <li>• All 3 areas provide and incredible food source for tui, bellbird (korimako) and kereru, as well as an amazing display of flowers and birdsong during the spring for those who know these areas exist and where they are. I feel these remnant areas should noted in the TTP Plan and be given the highest level of protection available."</li> </ul>

Keith Morfett	Buller/ Westland SNAs	<ul style="list-style-type: none"> <li>• Ecosystems and Indigenous Biodiversity Policies. The draft proposes that areas of significant vegetation and fauna habitat in Westland and Buller be identified through the resource consent process (ECO-P1).</li> <li>• Concomitant with this clause land owners may clear 0.5 ha of indigenous vegetation every three years as a permitted activity (ECO-R2).</li> <li>• There is therefore a real risk that significant natural areas will be gradually cleared by landowners prior to any resource consent being applied for.</li> <li>• This approach is inconsistent with the RMA and Buller and Westland should formally identify SNAs to prevent the creeping destruction of indigenous biodiversity.</li> </ul>
Clare Backes	Buller/ Westland SNAs	<ul style="list-style-type: none"> <li>• There are some good policies that give good direction to protect threatened and at risk species in the ECO chapter, but there are also some glaring omissions.</li> <li>• ECO-P1 states that significant indigenous vegetation and fauna will be identified through the resource consent process. However ECO-R2 states that clearance of 5000m<sup>2</sup> over 3 years is a permitted activity, which means that a potential SNA could be gradually cleared over a number of years and never be identified.</li> <li>• Westland and Buller do not have to formally identify SNAs until resource consent is applied for – this is contrary to the RMA.</li> <li>• There are some very vaguely worded policies e.g. ECO-P6 uses the term “reasonable measurable reduction” – this could be interpreted in a number of ways.</li> <li>• Overall there are many permitted activities which could be harmful to the environment – this puts the onus on the general public to monitor these activities, as the Councils are not able to monitor everything.</li> <li>• The lack of the need for a resource consent also excludes the general public and affected neighbours completely from the process.</li> </ul>
Hans Wiskerke	Policy  Buller / Westland SNAs   Rules	<ul style="list-style-type: none"> <li>• While it is correct the West Coast has a large area of indigenous vegetation, it would not be correct to conclude this is ‘intact natural diversity’ as there are many plant and wildlife species under threat, due to introduced predators, weeds including wilding pines, and effects of climate change.</li> <li>• The TTPP should aim to actively improve biodiversity, rather than refer to the high percentage of conservation land on the West Coast as a reason not to take (or slow down) active measures.</li> <li>• The proposed approach for Westland and Buller Districts (where no SNAs have been formally identified) would mean that any area with significant natural areas, where development takes place that does not require a resource consent, is assumed to not have any significant natural areas. This important assumption seems to be taken to avoid the need to formally identify SNAs.</li> <li>• While it is understood the identification of SNAs can have financial effects for the owner/user of the land, it should be remembered that humans are only guardians of the land. The best outcome from an environmental perspective would be if SNAs are formally identified so suitable protection measures can be taken.</li> </ul>

		<ul style="list-style-type: none"> <li>• In my view TTPP should also include protection for those areas of natural significance where non-resource consented developments are allowed to take place that could diminish or destroy its natural values.</li> <li>• ECO-R1 Windthrow timber should only be removed when essential, if is a risk to people, structures or infrastructure, as per ECO-R1-1. Such windthrow timber is a valuable resource for the ecosystem which it forms part of, and removing it for e.g. economic considerations should not be an allowed activity under the umbrella of Ecosystems and Indigenous Biodiversity.</li> </ul>
Forest and Bird	Buller / Westland SNAs Rules Definitions	<ul style="list-style-type: none"> <li>• Relying on consent processes to identify SNAs before they can be included in the plan means that this plan will not provide for the protection of SNAs. While the plan provisions suggest that areas identified through consenting will be added to the plan by way of plan change, this method is not adequate on its own</li> <li>• The limitation of matters of control or restriction makes it unclear whether an assessment under the RPS significance will or can be undertaken</li> <li>• The plan should provide for future and ongoing surveys to identify SNAs.</li> <li>• The RPS provides a framework under which permitted activities may be appropriate where adverse effects are no more than minor. However, the draft ECO rules would not ensure this</li> <li>• While some of the bottom lines, limits and other requirements of the RPS Chapter 7 policies are captured in the draft ECO policies, not all are.</li> <li>• For example, the hierarchy of measures before offsetting and then before compensation can be considered, the limits and requirements for offsetting and compensation are not captured</li> <li>• This is particularly concerning for areas that meet the significance criteria of the RPS but are not identified in the plan.</li> <li>• Even beyond those areas that may be significant, the limit of 5000m<sup>2</sup> appear high given the extent of loss that has occurred under the current district plans.</li> <li>• We are particularly concerned that this could result in clearance of remaining vegetation on a site including significant biodiversity within residential zones where property sizes are smaller and SNAs could extend over more than one property.</li> <li>• Definitions - AREA OF SIGNIFICANT INDIGENOUS BIODIVERSITY which capture both identified SNAs and areas meeting the Significance criteria of the RPS. We consider this term would be useful in other chapters. However, we note that the RPS policy requires areas identified using the significance criteria are known as SNAs</li> <li>• The definition of SIGNIFICANT INDIGENOUS BIODIVERSITY should be worded so that it captures areas that meet the significant criteria of the RPS.</li> <li>• The requirement for assessment should be set out in provisions. If the area has already been assessed, it should be mapped for inclusion in the plan schedules and maps</li> </ul>

West Coast Conservation Board	Policy Rules Buller/ Westland SNAs	<ul style="list-style-type: none"> <li>• Opportunities for the provision of guidance to landowners regarding recognising pakihī wetland so this can be appropriately managed under the NESF (as opposed to cleared under native vegetation clearance permitted activity rules),</li> <li>• Native vegetation clearance rules 0.5ha / 3 years in Buller and Grey Districts, and how this approach can allow the clearance of vegetation within SNAs under permitted rules. Understand this is an intermediary approach as the NPSIB is in train. However, SNAs (which may contain considerable ecological values e.g., GSK or other threatened wildlife) remain vulnerable to clearance activity. Consideration towards mechanisms that can be incorporated to protect our F/F values in our SNAs before they are recognised as such,</li> </ul>
Aggregate and Quarry Association	Rules	<ul style="list-style-type: none"> <li>• A major concern with the plan relates to the impact of SNAs and ONLs in the transition period between the plan being notified and when it becomes fully operative.</li> <li>• Specifically, the SNA, ONL and other overlay provisions will take effect when the plan is notified but the enabling provisions, both in the extractive zones and outside, will not become operative until decisions are made much later. This clearly causes problems for consent applications in that interim period. The rules need to be operational at the outset to prevent the SNAs from being legally effective without the intended enabling rules.</li> </ul>
Gordon Graham	Grey SNAs	seeks a copy of the s32 around SNAs
Community and Public Health	Policy	Re Eco-P9 recommend offsets are as close as possible to the development site
Trustpower	Buller/ Westland SNAs Definitions Policies	<ul style="list-style-type: none"> <li>• Opposes the approach for identifying significant natural areas in Buller and Westland and approach in ECO – P1</li> <li>• Seeks ECO –O2 should reference effects on values being remedied, mitigated, offset or compensated</li> <li>• Support ECO – P2</li> <li>• Seeks consistency across P6, P7 and P9 in relation to the Regional Policy Statement should be given further consideration.</li> <li>• Policy 7 be amended as follows:  When assessing resource consents in areas of significant indigenous vegetation and significant habitats of indigenous fauna, consider the following matters:  - ... - <b><u>The necessity for the activity to provide for critical infrastructure or renewable electricity generation;</u></b></li> <li>• ECO – R1 and ECO – R2 seeks amendment as follows:</li> </ul>

		<p>it is necessary for one of the following purposes:</p> <p>i. The maintenance, <b>operation</b> and repair of lawfully established tracks, fences, structures, buildings, <b>critical infrastructure, energy activities</b>, network utilities or natural hazard mitigation activities;</p> <p>For the installation of temporary network activities <b>or temporary energy activities in ENG-R5</b>, following a regional or local state of emergency declaration; .....</p>
NZTA	<p>Policies</p> <p>Rules</p>	<p>Support the following Objectives and Policies:</p> <ul style="list-style-type: none"> <li>ECO – O1, ECO – O2, ECO – O4, ECO-P7 and ECO – P9</li> </ul> <p>Support the following Rules</p> <ul style="list-style-type: none"> <li>ECO – R1, ECO – R2 but reword for clarity, ECO – R4/SUB R7</li> </ul>
Chorus, Spark and Vodafone	Policies	<ul style="list-style-type: none"> <li>The objectives and policies in this section appear to provide a workable approach for infrastructure. However, for consistency with other natural environmental overlays, a linkage to the new policy provisions being sought in the Infrastructure section for activities in sensitive overlays should be provided.</li> </ul>
Birchfield Coal	<p>Policies</p> <p>Buller/ westland SNAs</p> <p>Rules</p>	<ul style="list-style-type: none"> <li>support the need to protect areas of significant indigenous vegetation and significant habitats of indigenous fauna (collectively SNA).</li> <li>seek the exclusion of mineral extraction activities in the MEZ from this framework.</li> <li>BCML agrees with the proposal that SNA in Buller and Westland can be identified through the resource consenting process. BCML considers that site-specific (and where possible on the ground) assessment through resource consenting will be more robust than a broad desktop analysis for the purposes of the TTPP.</li> <li>BCML is unclear of the basis of some of the SNA (and ONL) identification and does not support these overlays applying to its operations without justification.</li> <li>BCML considers that identification should be on the basis of the criteria attached as Appendix 1 to the WCRPS. BCML considers that reference to specific criteria will provide consistency to the identification of SNA.</li> <li>There needs to be express acknowledgment in the provisions that functional activities like mining can often not avoid these areas.</li> <li>BCML considers that the management hierarchy adopted by the WCRPS should be used for management of SNA across the Districts. A similar hierarchy should be applied for Natural Feature Landscapes (ONL/ONFs).</li> <li>The consideration of biodiversity offsetting and environmental compensation at ECO P9 is vague and BCML considers that the policies in the WCRPS should be used.</li> <li>Combine R1 and R2</li> <li>BCML considers that in relation to mineral extraction activities indigenous vegetation clearance can be effectively managed through controlled (outside ONL/SNA) and restricted discretionary rules (inside ONL/SNA) rules.</li> </ul>

		<ul style="list-style-type: none"> <li>Although Grey District has mapped SNAs and Buller and Westland have not, we do not consider that different permitted activity rules are required. Buller and Westland will have SNA added to Schedule 4 either because they are regionally identified as SNA (i.e. wetlands) or through the resource consenting process.</li> </ul>
Straterra	Policies Rules	<ul style="list-style-type: none"> <li>Find the chapter complicated – seek more consistency with the WCRPS</li> <li>Support the provisions in ECO - P7 and ECO - P9 that allow for compensation</li> <li>The Significant Natural Areas (SNA) and Outstanding Natural Landscapes (ONL) provisions will have legal effect upon notification. Many of these provisions and overlays will apply to mineral extraction activities both within and outside of the Mineral Extraction Zone. Seek a consenting pathway and access to the management or mitigation hierarchy for current and future mineral extraction activities.</li> <li>ECO - O2, ECO-P2 and ECO – P6 should allow for mitigation</li> <li>ECO – R1 and R2 should specifically provide for lawfully established activities</li> <li>Identify some drafting errors in rules</li> </ul>
Minerals West Coast		<ul style="list-style-type: none"> <li>Where mineral values and biodiversity or landscape values intersect, mining can still be carried out responsibly in keeping with the objectives of the Resource Management Act. In these instances, Minerals West Coast supports a consenting pathway that provides access to the effects management hierarchy.</li> <li>This allows use or development to in the first instance: <ul style="list-style-type: none"> <li>- Avoid, and where not possible:</li> <li>- Mitigate, and where not possible:</li> <li>- Remedy, and where not possible:</li> <li>- Offset, and where not possible:</li> <li>- Compensate.</li> </ul> </li> <li>Where restrictions do apply as a result of overlays or other provisions, this consenting pathway needs to be clearly available. Where mineral extraction is not a permitted activity there must be a clear and defined consenting pathway that is able to allow for mineral extraction to occur in a way that causes no net loss (and preferably a net gain) to other values, e.g. indigenous biodiversity.</li> </ul>



# Te Tai o Poutini

## PLAN

*A combined district plan for the West Coast*

Prepared for: Te Tai o Poutini Plan Committee

Prepared by: Lois Easton, Principal Planner

Date: 29 April 2022

Subject: **Te Tai o Poutini Plan – General Rural Zone Subdivision and Density in the General Rural Zone**

---

### **SUMMARY**

This report brings back the draft Plan feedback on the General Rural Zone Subdivision rules.

The report considers what is the appropriate minimum lot size for a controlled activity. It considers the implications in terms of increasing lifestyle development and reverse sensitivity impacts on primary production activities. It recommends changes to the minimum subdivision lot size for the controlled activity for the General Rural Zone in the proposed Te Tai o Poutini Plan.

### **RECOMMENDATIONS**

1. That the Committee receive the report.
2. That a Highly Productive Land Overlay be included within the TTPP.
3. That the Controlled Activity Minimum Lot Size in the Highly Productive Land Overlay in the General Rural Zone in the proposed Te Tai o Poutini Plan be 10ha.
4. That the Controlled Activity Minimum Lot Size for Subdivision in the General Rural Zone (outside of the Highly Productive Land Overlay) in the proposed Te Tai o Poutini Plan be 4 ha.
5. That the residential density provisions in the General Rural Zone be aligned with the Controlled Activity Subdivision minimum lot size in the General Rural Zone.

Lois Easton

**Principal Planner**

## INTRODUCTION

1. The exposure draft Te Tai o Poutini Plan was made available to the public on 26 January 2022. A series of consultation meetings and drop in sessions were undertaken over late February. Feedback on the draft was able to be provided until 11 March and an overview of this and proposed responses was considered at the 29 March meeting of the Committee for discussion and decision around amendments to the draft Plan.
2. The issue of minimum lot sizes for rural subdivision was the subject of 15 separate pieces of feedback. Given its significance, this report outlines the current operative plans approaches, the draft Plan proposal and the feedback received.

## KEY CONTEXT

3. Subdivision is often an essential prerequisite for development. It enables the intensification of land uses, (including residential activity), which in turn increases levels of activity, density of built form, traffic generation and demand on infrastructure services.
4. The way an allotment is subdivided, including its size and shape, is important as it not only determines the quality and character of development, but it also impacts on adjacent sites and the future use of the land.
5. It is also important that the design and layout of a subdivision responds to any constraints on the ability for the allotments to be developed. Constraints may include significant natural, cultural, historical or ecological features within or adjoining the site, the potential impact of development on, or effects of, strategic infrastructure, or risks from natural hazards.
6. Subdivision introduces long-term development patterns that cannot be easily changed. The subdivision process regulates the provision of services for development and activities, including reserves and infrastructure.
7. The adverse effects of activities are generally controlled by the provisions for each zone at the time of development.
8. However, some potential effects of those activities that may be undertaken on sites are most appropriately managed at the time of subdivision. For example, the formation of new connections to roads may have an impact on the amenity values of an area and the safety and efficiency of the transport network, and the most effective means of addressing such effects is through a subdivision consent. It is also important to ensure that new sites being created are of a size and shape that can accommodate future development and be adequately serviced, either by reticulated services or on-site.
9. The subdivision of land to create new sites on undeveloped land also creates expectations and property rights. It requires consideration of the need for public open space, esplanade reserves, community facilities and connections to and servicing by other infrastructure. Cost-effective servicing by infrastructure is an important consideration for greenfield developments. However, ensuring sufficient infrastructure capacity can also be an issue for the subdivision of already developed land.
10. Māori land held under Te Ture Whenua Māori Act 1993 is exempt from the subdivision provisions of the RMA. It is primarily controlled by the Te Ture Whenua Māori Act 1993 and administered by the Māori Land Court.

## RURAL SUBDIVISION IN THE EXISTING OPERATIVE DISTRICT PLANS

11. The current plans take quite different approaches to rural subdivision. The rules are summarised below:

### *Grey*

- Controlled activity to meet specified minimum lot size of 1 ha in Rural Environment Area
- All other subdivision Discretionary Activity.

### *Westland*

- Discretionary activity for all rural subdivision with a minimum lot size of 5000m<sup>2</sup>. Given the large amount of rural residential development in Westland it appears that rural Discretionary subdivisions consents are frequently applied for and granted.



- Non-complying where Discretionary minimums are not met. More recently minimum lot sizes of 2500m<sup>2</sup> have been granted in some locations.

#### *Buller*

- Discretionary Activity for subdivision in the Rural Zone, Paparoa Character Area and Natural Environments Character Area. Like Westland this has had the effect that Discretionary Activity applications are common – and appear to be almost always granted. There is no guidance as to minimum lot size for the Discretionary Activity – and rural lifestyle subdivisions are found with a range of sizes from 4000m<sup>2</sup> to several hectares.

### **DRAFT TTPP SUBDIVISION RULES**

12. The draft TTPP approach is most similar to the Grey Plan in that it provides a Controlled Activity for subdivision in most zones with a minimum lot size. However in light of the strong direction from the Committee to avoid situations of future reverse sensitivity for primary production activities with lifestyle developments a minimum lot size of 20ha for the Controlled Activity is included in the draft Plan. If the minimum lot size is not met, then the activity would be a Discretionary Activity – (similar to the current approach in the Buller and Westland Plans).
13. It should also be noted that there are substantial areas in the Grey District (particularly around Greymouth – Runanga – Barrytown – Lake Brunner) which are proposed for rezoning to Rural Lifestyle where a 1ha minimum lot size is proposed.
14. The draft TTPP does not include any provision for grandparenting of existing developments that may breach the minimum lot size.

### **FEEDBACK RECEIVED**

15. 15 individuals and stakeholders provided feedback on the General Rural Zone subdivision provisions, most commonly the minimum lot size for the Controlled Activity. This is summarised in Appendix One. Key points to note are:
  - There was no feedback provided that supported the draft Plan 20ha minimum lot size.
  - Farming organisations Federated Farmers and Beef and Lamb NZ consulted their members for views about minimum lot size and their feedback reflects that aggregated view. The preference from Federated Farmers was a 5ha minimum lot size in order to protect productive values.
  - Buller District Council has provided specific feedback that they prefer a 4ha minimum lot size for the General Rural Zone.

### **DISCUSSION**

#### *Protection of Productive Land*

16. Highly productive or versatile land is a limited resource on the West Coast. Initially in developing TTPP it was proposed to include a Rural Production Zone which covered this highly productive land. However with the decision to restrict subdivision in the General Rural Zone, and the relatively small area where specific high production values exist, it was decided to not include the zone. If however there is a reduction in the minimum lot size from 20 ha, it is the recommendation of the technical staff that a Highly Productive Land Overlay where a greater subdivision restriction applies is warranted. Grey District Council staff have provided a map attached at Appendix Two which identifies key locations of concern in the Grey District. The high value soils area at Karamea in the Buller District is the other location where technical staff consider a Highly Productive Land overlay and greater subdivision restriction would be warranted. This area is also shown in Appendix 2.

#### *Reverse Sensitivity and Rural Subdivision*

17. A key component of the rationale for an increased minimum lot size was the permissive provisions in the General Rural Zone for primary production activities, including mineral extraction.
18. An early issue identified in the consultation process for TTPP was that where lifestyle development has occurred in rural areas, reverse sensitivity concerns around amenity issues (visual amenity, dust, noise, traffic generation) associated with mineral extraction are a significant issue. There are also reverse sensitivity issues that have arisen with dairy farming

(dairy sheds), intensive farming and beekeeping. This has recently been evident in two mineral sands resource consent applications – at Barrytown and Cape Foulwind, where neighbour amenity concerns are a substantive consideration. The more subdivision that is provided for in the General Rural Zone, the more difficult it becomes to justify permissive provisions for activities that can generate significant off site amenity effects. This is a key consideration when deciding on minimum lot sizes.

#### *Use of Rural Land*

19. The General Rural Zone is a very widely used zone in the draft TTPP. It has been applied across land with variable production values – it includes land with significant agricultural values, minerals values and natural environment values.
20. In setting a minimum lot size for the General Rural Zone, the variable nature of the land should be considered. To date the policy direction from the Committee has been to prioritise primary production values over subdivision, it should be acknowledged that in some instances there are few economic uses currently available for some areas of General Rural Zone land. Within the current draft TTPP subdivision rules there are opportunities for subdivision below 20ha – but only if an area of significant native vegetation is protected. A reduction in minimum lot size would create some further opportunities for owners of land of less productive value to be able to gain some economic benefits from their land, without the need for specific legal protection of natural areas. The key consideration in setting this minimum lot size will be to not compromise productive uses or result in substantial subdivision adjacent to locations where primary production activities become compromised because of nearby residential dwellings.

#### **MINIMUM LOT SIZES IN RURAL AREAS IN OTHER DISTRICTS**

21. In considering what is an appropriate minimum lot size it is useful to consider how this matter is dealt with in other areas.
22. Where there are high primary production values (e.g. Waimakiriri Plains in Selwyn District, Timaru District, New Plymouth District) minimum lot sizes of 20ha (or greater) are common. However where the land productivity values are more mixed, smaller sizes are sometimes used, e.g. Port Hills and rural land closer to Christchurch in Selwyn District (Selwyn District) is 4ha, Central Hawkes Bay is 12 ha, Nelson 15ha – with a 3ha minimum lot size provided for in specific locations.

#### **RECOMMENDED CHANGES TO THE DRAFT TTPP**

23. Based on the analysis above and the feedback on the draft TTPP, staff recommend the following changes to the TTPP.
  - a. The creation of a Productive Land Overlay to cover land identified in Grey and Buller Districts as outlined in Appendix 2.
  - b. The amendment of the Controlled Activity minimum lot size for the General Rural Zone (outside of the Highly Productive Land Overlay) from 20 ha to 4 ha.
  - c. The amendment of the Controlled Activity minimum lot size for the Highly Productive Land Overlay from 20ha to 10ha.
  - d. The alignment of the General Rural Zone density provisions with the Controlled Activity subdivision minimum lot size for the General Rural Zone.

## Appendix One: Summary of Feedback Received on Rural Subdivision Provisions

Name/Organisation	Feedback
Kate Mckenzie Pauline Hadfield	<ul style="list-style-type: none"> <li>• A 20ha rural allotment size is impractical. 20ha is generally not an economic farming unit but too large to be used as rural lifestyle.</li> <li>• In places around the country where a 20ha minimum is proposed, this is generally quite some distance from townships with some sort of transitional residential density in closer proximity.</li> <li>• The proposal to change to a minimum 20ha allotment size as a blanket rule across the GRUZ would be quite restrictive compared to the current situation.</li> <li>• The 20ha minimum also does not fit with current patterns of development, particularly in close proximity to townships.</li> <li>• An extended grandfather clause is also needed for the minimum residential density rule so that lawfully established subdivision do not require land use consent to construct a dwelling. I would suggest that at the least the rule should have a grandfather clause that allows consented subdivisions to have dwellings permitted as of right, and consideration should be given to the date being the operative date rather than the notification date of the proposed plan.</li> </ul>
Lynley Hargeaves	<ul style="list-style-type: none"> <li>• The old Westland plan has a minimum subdivision area in the rural zone of 0.5ha.</li> <li>• The new plan changes this to 1ha for subdivision for residential use rural lifestyle zone and 20ha for the general rural zone. These are both far too big.</li> <li>• The 20ha minimum lot size in particular will stop most new people from living rurally and mean that those that do will take more land from primary production (eg 20ha removed from primary production as opposed to 0.5-1ha).</li> <li>• The minimum lot size should be changed to 0.5ha for the rural lifestyle zone and 1ha for the rural zone</li> </ul>
Martin Kennedy	<ul style="list-style-type: none"> <li>• Our Lot size is 17.8 hectares and therefore below the proposed minimum of 20 hectares but we understand residential development is provided for as this is a site existing at the time the plan is notified.</li> <li>• We seek that those rights be confirmed, and ensured, and not lost.</li> <li>• As regard subdivision we note that the draft makes potential development of our site more difficult.</li> <li>• We have concerns in this regard and question how this Lot size was determined as the most appropriate.</li> </ul>
Beef and Lamb	<ul style="list-style-type: none"> <li>• Provide a Restricted Discretionary consenting pathway for subdivision that does not meet minimum lot size in the GRUZ with assessment criteria considering the impact on the function and efficiency of agricultural activities being undertaken and the maintenance of productive land.</li> </ul>
Rosalie Sampson	<ul style="list-style-type: none"> <li>• Minimum subdivision of twenty hectares in rural general zoning, is a backward proposal and very flawed.</li> <li>• Twenty hectares, unless horticulture is not likely to be a viable unit, whereas a much smaller area 1500sq metres will not take away from the viability of an operating farming unit but will provide another household contributing to a rural community.</li> </ul>

Name/Organisation	Feedback
	<ul style="list-style-type: none"> <li>• There are limited areas for building in our rural towns and when an awkward area on a farm can be used for housing it will be considerably more profitable to a rural community.</li> <li>• Minimum of twenty hectares in the rural general zone must be reconsidered.</li> </ul>
Deb Landridge	<ul style="list-style-type: none"> <li>• Subdivision in rural setting I also disagree with subdivision of land parcels only being in large blocks.</li> <li>• Landowners need the flexibility to downsize or sell off land or cut sites off for housing for their children/parents, to run a business or whatever.</li> <li>• Once again large parcels enable the mining sector.</li> </ul>
William McLaughlin	<ul style="list-style-type: none"> <li>• I submit that the "SUB – S1 Minimum Lot Sizes for each allotment" Subdivision Standard should be amended so that, in the case of the General Rural Zone, the SUB – S1 minimum lot size is 4Ha.</li> </ul>
Jackie Mathers & Bart Gillman	<ul style="list-style-type: none"> <li>• GRUZ - R3 We feel the residential unit density of no more than one unit per 20ha is excessive particularly when Ngai Tahu can have one unit per hectare under GRUZ - R4 (albeit with a maximum of 5 units per site). This seems inflammatory to us in terms of one rule for Ngai Tahu and another rule for others.</li> <li>• With large areas of the Northern Buller coastline subject to erosion, there needs to be room to move residential properties to higher ground and much of the neighbouring land available is not valuable or productive farm land but simply suitable higher ground which happens to be in the rural zone.</li> <li>• Consideration should be given to available rural lots that don't affect working farms otherwise you leave these people with no-where to go.</li> </ul>
Grant Marshall	<ul style="list-style-type: none"> <li>• Regarding the 20 hectare minimum lot. I can understand what is trying to be achieved by trying to keep farmable land from being divided into smaller lots, but think this is impractical here on the coast where there is certainly not a shortage of land, a lot of which is very marginal for farming practices.</li> <li>• A 20 ha block is a financially unviable size. What quite often happens is the idea of owning a block of land, running some livestock etc, the dream soon fades and turns into a chore with yards needed, TB testing ,weed control, adequate fencing to keep stock proof, animal welfare management.</li> <li>• A one hectare block can also be more than some people can manage. But it would be more manageable for planting out and weed control.</li> </ul>
Ross Community Society	<ul style="list-style-type: none"> <li>• It is the wish of the community residents that the current guidelines in force around Ross be maintained as the status quo.</li> <li>• Any regulations currently give all property owners the ability to do with their privately owned land, what they wish (eg., mine (via the appropriate licences or sub-divide) without the hardship of having to deal with another layer of bureaucracy.</li> </ul>

Name/Organisation	Feedback
	<ul style="list-style-type: none"> <li>• It is also felt that the TTPP proposal stymies any future developments or business opportunities on blocks of land smaller than 20 hectares.</li> <li>• This would be the case even if the land was owned by mining interests that wanted to diversify, or for private landowners.</li> <li>• Therefore, as mentioned above, the Ross Community Society, Inc. on behalf of the Ross community residents, would like the "status quo" to remain.</li> </ul>
Jeni Greenland	<ul style="list-style-type: none"> <li>• Hi I wish to submit that properties that fall in the general rural zone have the minimum lot size reduced to allow future subdivision, as I am happy to stay in the zone we are...but may wish to subdivide one day, and are not any where near a working farm.</li> </ul>
Ted Brennan	<ul style="list-style-type: none"> <li>• Subdivision in the General Rural Zone (GRUZ): We own a 70 hectare block of rural land along Bold Head Road south of the Mikonui River.</li> <li>• Currently we could make parcels of that land to a minimum size of 5000m<sup>2</sup> available to our four children to build/live should they so wish, either though subdivision or cross leasing.</li> <li>• Under the TTP plan the size is expanded to 20 ha. This is unfair and restrictive to the landowner.</li> <li>• Creating a few small allotments would have no impact on the current rural use of the land (farming).</li> <li>• It also potentially removes financial options and opportunities for the landowner.</li> <li>• I'd imagine this concern could be transferred to many other landowners, regardless of perceived "reverse impacts".</li> </ul>
Kathy Gilbert	<ul style="list-style-type: none"> <li>• Rural Lifestyle zones are too restrictive - should be 0.5 ha minimum lot size.</li> <li>• 20 ha is too big for General Rural Subdivision, Rural Lifestyle should be encouraged by the plan</li> </ul>
Federated Farmers	<ul style="list-style-type: none"> <li>• An area of importance identified by our members in the survey is the minimum lot size of 20ha for the General Rural Zone. A minimum lot size of 20 ha is potentially reducing flexibility of landowners to deal with their property – the survey indicated that a smaller lot size (5ha) is preferred.</li> <li>• It is important to ensure that rural land continues to be available for farming, but also recognise that housing is needed to support rural communities and farming.</li> <li>• As an organisation FFNZ believes that council subdivision and development policies and planning should provide for managed growth in rural communities.</li> <li>• While it is acknowledged that the loss of productive land can impact on a district's economy, there is also a need to recognise that farmers undertake small lot subdivision to provide for farm succession, dispose of surplus dwellings and for providing on-farm accommodation for employees.</li> <li>• Our members are also questioning the draft subdivision rules for the General Rural Zone. Farmers are concerned that the limitation of "minor" residential unit being a maximum of 65m<sup>2</sup>.</li> <li>• Rural housing should be viewed as an essential component of our rural social wellbeing. An issue for all rural communities is having attracting and keeping staff. Providing suitable housing that supports families is part of that – we need to ensure</li> </ul>

Name/Organisation	Feedback
	<p>that we are supporting our farming businesses and rural communities. Houses that are too small for families will make it harder to attract staff.</p> <ul style="list-style-type: none"> <li>• FFNZ general position with regards to subdivision is on the protection of productive land to ensure primary production can continue to ensure the long-term viability of the agricultural sector. However, this general position is balanced against the fact that land needs people, its farmers and growers, to make the land productive. Farming is often a multi-generational enterprise, with the land asset providing a place for both home and business. This means farmers value flexible policy settings which enable farm succession planning to occur, provides for practical boundary relocation options, and incentivises win win opportunities to create public good environmental outcomes, while at the same time understanding the issues created by fragmentation of productive land.</li> </ul>

## Appendix Two: Areas Recommended for Highly Productive Land Overlay

[Note the black hashed areas are not areas to be included - they are built up areas, areas to allow further development or areas that have been included in other maps].

### Taramakau Settlement



**Inchbonnie**





**Poerua-Rotomanu**



**Rotomanu – Moana**



**Ruru – Bell Hill**



**Kotuku North**



**Kopara – Haupiri**



**Red Jacks – Ngahere**



**Ahaura Plains**



**Waipuna**



**Ahaura East**



**Totara Flat**



**Ahaura North**





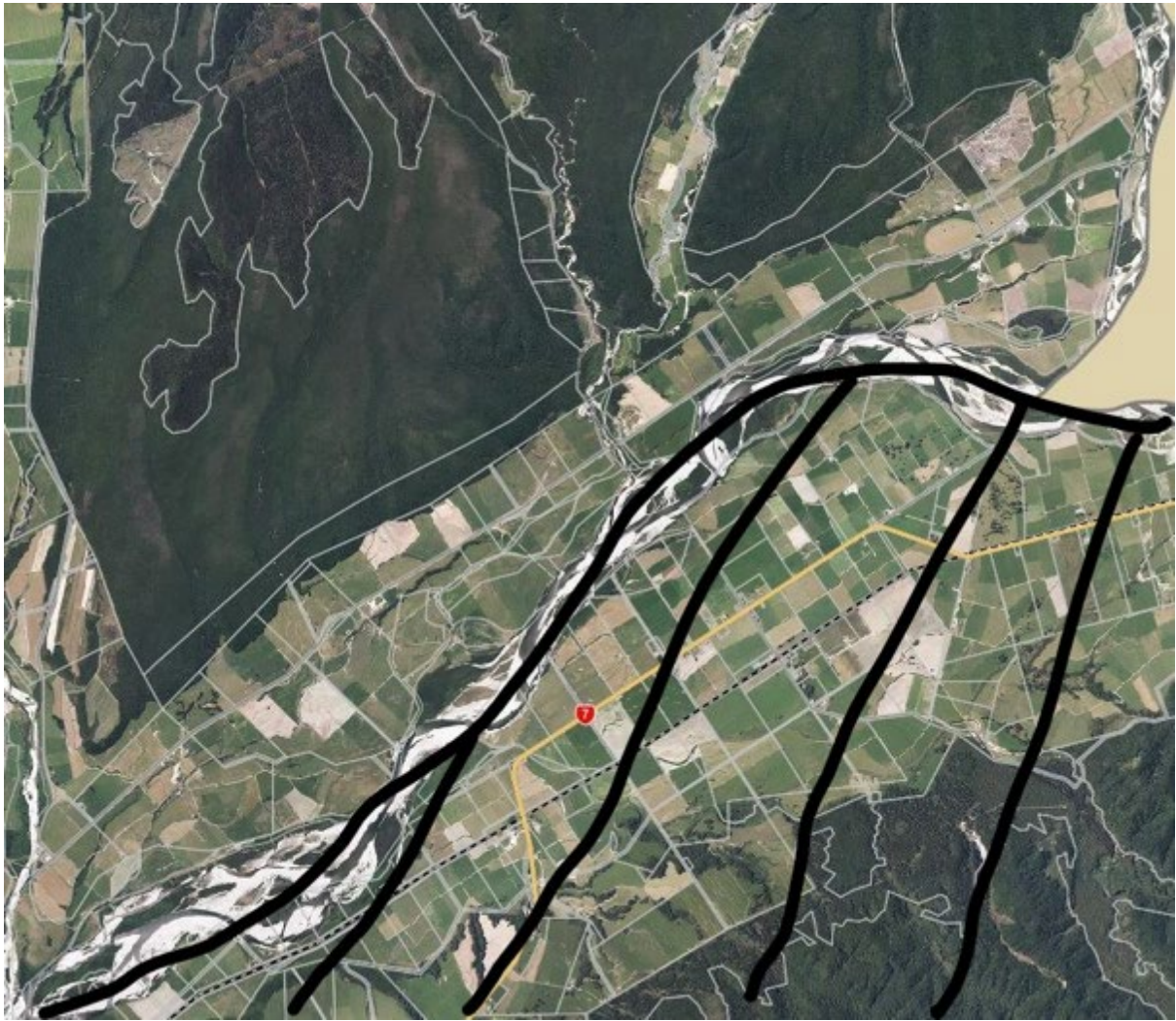
**Slaty Creek**



**Atarau**



**Craigieburn**



**Karamea -Oparara**



## Karamea





# Te Tai o Poutini PLAN

*A combined district plan for the West Coast*

Prepared for: Te Tai o Poutini Plan Committee  
Prepared by: Lois Easton, Principal Planner  
Date: 29 April 2022  
Subject: **Te Tai o Poutini Plan – Mineral Extraction**

---

## **SUMMARY**

This report brings back the draft Plan feedback on the Mineral Extraction provisions. This was the topic with the greatest amount of feedback and where the widest range of views were provided.

The report considers in particular:

- What lands should be within the Mineral Extraction Zone
- What provisions are appropriate for the Mineral Extraction Zone
- What provisions are appropriate for the Buller Coalfield Zone
- What provisions are appropriate for mineral extraction in the General Rural Zone and Open Space Zone

## **RECOMMENDATIONS**

1. That the Committee receive the report.
2. That the mineral extraction provisions be amended in accordance with the approach outlined in the report.

Lois Easton

**Principal Planner**

## **INTRODUCTION**

1. The exposure draft Te Tai o Poutini Plan was made available to the public on 26 January 2022. A series of consultation meetings and drop in sessions were undertaken over late February. Feedback on the draft was able to be provided until 11 March and an overview of this and proposed responses was considered at the 29 March meeting of the Committee for discussion and decision around amendments to the draft Plan.
2. A wide range of feedback on the draft provisions for mineral extraction was provided with 67 separate pieces of feedback. This topic was the subject of the greatest number of pieces of feedback on the draft Plan. Given its significance, this report outlines the current operative plans approaches, the draft Plan proposal and the feedback received.

## **MINERAL EXTRACTION IN THE EXISTING OPERATIVE DISTRICT PLANS**

3. The Buller and Westland Plans have specific provisions for Mineral Extraction. All mineral extraction and some prospecting activity requires a resource consent. Generally this is a Restricted Discretionary Activity consent, however if substantial vegetation clearance is included then a Discretionary Activity consent is required.
4. The Grey Plan does not specifically reference mineral extraction. Where it is able to be undertaken within Permitted Activity standards in relation to noise, buildings, traffic movements and the natural environment it will generally be a Permitted Activity. Larger scale mineral extraction (e.g. the Barrytown mineral sands proposal) will generally trigger a Discretionary Activity resource consent.

## **DRAFT TTPP MINERAL EXTRACTION APPROACH AND RULES**

5. The general approach to mineral extraction in the draft TTPP is:
  - a. Putting in place an overarching framework through the strategic objectives that supports mineral extraction activities.
  - b. Identification of specific areas where mineral extraction activities are established and expected to be undertaken throughout the life of the plan (i.e. the next 10-15 years) as Mineral Extraction Special Purpose Zone.
  - c. Inclusion of the Buller Coalfield in a Special Purpose Zone.
  - d. Inclusion of specific provisions for mineral extraction as a Restricted Discretionary Activity in the Open Space Zone.
  - e. A cascading set of rules for mineral extraction in the General Rural Zone – whereby there are Permitted, Controlled and Restricted Discretionary Activities.

### **Identification of the Buller Coalfield Zone**

6. The Buller Coalfield Zone covers land at Stockton, Denniston and Te Kuha. It is made up of the following mines/mining areas:
  - Stockton Mine and ancillary infrastructure
  - Mt William Mine
  - Cypress Mine
  - Cascade Mine
  - Escarpment Mine
  - Sullivan Coal Mining Licence area and ancillary coal mining licence area
  - Te Kuha Mine and ancillary infrastructure.
7. The shape files for this Zone were provided by the operators/licence holders of the identified mineral extraction areas. These were then checked and confirmed by the TTPP technical team.
8. The locations and the basis that they are considered “lawfully established” is included within Schedule 9 of the Plan. The zone includes locations where mining is not currently being undertaken (e.g. Sullivan Coal Mining Licence area) but has been approved by resource consent or is subject to a coal mining licence.

### **Identification of the Mineral Extraction Zone**

9. The Mineral Extraction Zone covers land in a wide range of locations across the West Coast. A special purpose zone was originally justified on the basis that it is difficult to manage the activity within the constraints of other zones.
10. Key criteria in identifying sites to be included within the Zone are:

- Areas where there are discrete, long term mineral extraction activities currently authorised. The authorisation comes from:
  - Coal mining licences under the Coal Mines Act (1979);
  - Ancillary coal mining licences under the Coal Mines Act (1979);
  - Resource consents issued under the Resource Management Act (1991); and
  - Permitted Activities (in the Grey District).

11. It is made up of the following mines and ancillary activities:

Coal Mining Areas and Ancillary Facilities

- Paparoa Coalfield
- Roa Mine, Blackball
- Rajah Mine, Blackball
- Mt Davy Mine, Blackball
- Spring Creek Mine, Runanga
- Echo Mine, Reefton
- New Creek Mine, Reefton
- Mai Mai Siding
- Reefton Distribution Centre
- Island Block Mine, Reefton
- Grey Valley Distribution Centre, Ikamatua
- Strongman Mine, Rapahoe
- Rapahoe Coal Yard
- Rocky Creek Coal Washery
- Kaiata Distribution Centre
- Giles Creek Mine, Reefton

Quarries

- Kiwi Quarry
- Karamea Quarry
- Blackball Quarry
- Okuru Quarry
- Rapahoe Quarry
- Cambelback Quarry

Hard Rock Gold

- Island Block
- Reefton

Alluvial Gold and Mineral Sands Areas

- Dunganville Goldfield
- Greenstone Goldfield
- Rimu Goldfield
- Ross Goldfield
- Kumara Goldfield
- Ianthe Goldfield
- Proposed Barrytown Mine area

12. The shape files for this Zone and information on the resource consents/basis of "lawful establishment" were provided in most cases by the operators/licence holders of the identified mineral extraction areas. These were then checked and confirmed by the TTPP technical team.
13. Until close to finalisation of the draft Plan there were no alluvial gold mining areas included within the zone. The Committee were very clear however that the Ross goldfield and other alluvial areas should be included. After further meetings with the minerals industry, shape files for alluvial gold mining areas, and the basis that they could be considered "lawfully established" was provided to the TTPP team by consultants to the industry. Because of time and resource



constraints, staff were unable to undertake detailed checks of this information and it was included within the draft Plan largely as provided.

14. In addition, based on the expectation that the Barrytown Mine proposal would be approved, and therefore be a "lawfully established activity" – meeting the criteria for the zone, a Mineral Extraction Zone was included for the proposed Barrytown mine area.

### **Rules for Buller Coalfield Zone and Mineral Extraction Zone**

15. The draft Rules for the Buller Coalfield Zone and Mineral Extraction Zone have been considered by the committee at multiple meetings. These were largely finalised for the draft Plan in October 2021. However because decisions from the Committee around the overlays (and particularly the ecosystems and biodiversity provisions) were relatively late in draft plan development, the provisions are acknowledged to need further work to integrate them well into the rest of the plan.
16. Generally the approach in the two zones is similar and as follows:
  - Lawfully established mineral extraction activity and ancillary activity (buildings, structures, traffic movements) is "grandfathered" as a Permitted Activity. This includes where there is a Coal Mining Licence, a resource consent, or an activity established (in the Grey District) under Permitted Activity provisions.
  - New mineral extraction is provided for as a Controlled Activity provided this does not impact on any Overlay area (e.g. Scheduled heritage sites, outstanding landscapes, significant native vegetation, riparian areas).
  - Where Overlay areas are impacted a Restricted Discretionary or Discretionary resource consent is required.
  - Overlay provisions apply to these zones, as they do to all zones in the Plan.
17. Currently the way the draft plan is written there is duplication in some of these provisions, which is acknowledged by the technical team as needing further refinement.

### **Rules for Mineral Extraction in the General Rural Zone**

18. The draft Rules for mineral extraction in the General Rural Zone have been considered by the committee at multiple meetings. These were largely finalised for the draft Plan in October 2021. However at the meeting of 16 December 2021, when the draft Plan was adopted for feedback, a late change was made to the Permitted Activity provisions – specifically doubling the area of Permitted Mineral Extraction from 2ha to 4ha.
19. The original 2ha area had been arrived upon as a result of detailed technical discussion with district council staff familiar with mining operations. It was intended to provide for a small scale alluvial mining operation (as the most likely scenario) with sufficient land for settling ponds and stockpiles. It was not intended to enable most mineral extraction activity on the West Coast to be Permitted. The increase in size to a 4ha Permitted Activity provision would enable many if not most mineral extraction activities on the West Coast, at least in terms of land area, to be Permitted. They would however still be subject to performance standards which would in practice require a resource consent in some instances.
20. The draft Plan rules as consulted on:
  - Permitted Activity
    - Mineral Prospecting and Mineral Exploration
    - Mineral extraction of less than 20,000 m<sup>3</sup>/annum or where progressive rehabilitation occurs so that disturbance is limited to no more than 4ha at any one time per property, provided that mineral extraction is not undertaken within an Overlay area, or within 250m of a residential building on any residential, settlement or rural living zone and that a range of other amenity standards are met.
  - Controlled Activity:
    - Mineral extraction in defined previously mined and scheduled locations (however the minerals sector has not been able to provide information to be included in a schedule to support this rule)
  - Restricted Discretionary Activity
    - Mineral extraction not meeting Permitted or Controlled Activities where this is outside of an Overlay area
  - Discretionary Activity

- Mineral extraction in an Overlay area

## COMPARISON WITH OTHER DISTRICTS

21. When considering what mineral extraction provisions are appropriate in Te Tai o Poutini Plan, it is worth considering how these issues are managed in other parts of the country. As has been discussed in previous reports, the draft Plan has the most enabling provisions for mineral extraction in the country. These are matters that are highly contentious everywhere, and it can be expected that other districts provisions reflect the input from the wide range of differing views of stakeholders on the topic.
22. For comparison the Whangarei District, Waitaki District, Waikato District and Christchurch City are all locations where specific zones are used to manage mineral extraction and quarrying activities. Resource consents however are still generally required for mineral extraction in these special zones. Discretionary Activity consent requirements for mineral extraction in Rural Zones are also a common requirement.

## FEEDBACK RECEIVED

23. 67 individuals and stakeholders provided feedback on the Mineral Extraction provisions.
24. This feedback is summarised in Appendix One. There are a number of key themes to the feedback and this is summarised in the table below.

Theme	Feedback
General Approach	<ul style="list-style-type: none"> <li>• Minerals sector feedback generally supported the general approach of having mineral extraction zones, however some expressed concern that the provisions may not be sufficiently enabling</li> <li>• Mechanisms for addition of new Mineral Extraction Zones to the plan were sought.</li> <li>• Clarification was sought about the relationship between the mineral zone chapters and overlays by several stakeholders – particularly as relates to the consenting pathway where there are overlays</li> <li>• 17 people sought the removal of all mineral extraction zones. Key matters raised in their feedback were: <ul style="list-style-type: none"> <li>○ The zones remove landowner rights to object or modify mining applications</li> <li>○ Wider community effects may occur</li> <li>○ Consider the Mineral Extraction Zone does not meet the National Planning Standards as the Activity can be managed in other zones</li> <li>○ Large areas of the draft Mineral Extraction Zones will not be used for mining as they include areas that have already been mined or will never be mined</li> <li>○ Substantial areas of gold mining will occur outside the Mineral Extraction Zones – therefore the identification of specific areas for inclusion has a poor basis.</li> <li>○ Reverse sensitivity concerns for alluvial gold mining are unreasonable – solving a problem that does not really exist as currently alluvial gold mining and other land uses are well managed through the resource consent process and consents are almost always granted</li> <li>○ Mining Licences predate the RMA and do not contain adequate environmental management conditions.</li> </ul> </li> </ul>
Barrytown Mineral Extraction Zone	<ul style="list-style-type: none"> <li>• 14 people sought the removal of the Barrytown Mineral Extraction Zone. Key issues related to amenity concerns of neighbours, and that the Barrytown Mine resource consent has been declined – therefore it is not a lawfully established activity.</li> </ul>

Ross Mineral Extraction Zone	<ul style="list-style-type: none"> <li>• 4 people and organisations sought the removal of the Ross Mineral Extraction Zone. This included landowners who owned land within the proposed zone and considered it inappropriate for their land. Key concerns related to: <ul style="list-style-type: none"> <li>○ Desires by landowners to use their land for purposes not provided for in the Mineral Extraction Zone</li> <li>○ Identification of some sites where mineral extraction had already occurred, and were not likely to be mined again</li> <li>○ The direct adverse effect on the Ross township – with rules restricting subdivision within 250m of the zone and development of residential activities</li> <li>○ The wider effect on preventing landowners from using their land for other purposes, including lifestyle development.</li> </ul> </li> </ul>
Rimu Mineral Extraction Zone	<ul style="list-style-type: none"> <li>• 1 person (a landowner within the zone) sought the reduction in size of the Rimu Mineral Extraction Zone, as the area has already been mined. The feedback also identified the short timeframe for alluvial mining on the site (suggesting a different zone will be needed once the mining is complete)</li> </ul>
Paparoa Mineral Extraction Zone	<ul style="list-style-type: none"> <li>• 1 person opposes the Paparoa Mineral Extraction Zone – concerns expressed around amenity impacts, and the overall focus of the plan supporting mineral extraction</li> </ul>
Buller Coalfield Zone	<ul style="list-style-type: none"> <li>• 2 people opposed the Buller Coalfield Zone – concerns raised were that extending the area of existing activities would have significant adverse effects on indigenous biodiversity as well as climate change impacts</li> <li>• The Buller District Council supports the zone but sought that effects on indigenous biodiversity from progressive mining activities continue to be well managed to ensure Section 6c of the RMA is met.</li> <li>• Bathurst Resources seek additional land on the Denniston Plateau and Waimangaroa Valley be included within the zone</li> </ul>
Additional Sites for Inclusion into the Mineral Extraction Zone	<ul style="list-style-type: none"> <li>• 21 people sought the addition of the Karamea Lime Quarry into the Mineral Extraction Zone;</li> <li>• 1 stakeholder sought that the Westland Schist Quarry be included within the zone</li> <li>• 2 stakeholders sought that the Snowy River Mine near Reefton be included within the Zone</li> </ul>
Mineral Extraction Zone and Buller Coalfield Zone Policy	<ul style="list-style-type: none"> <li>• Reference to “current authorised” in policy is unnecessary and will exclude legal activities</li> <li>• Relationship between the MINZ/BCZ rules and ECO/CE provisions needs to be clearer – there is confusion in the current wording</li> </ul>
Mineral Extraction Zone and Buller Coalfield Zone Rules	<ul style="list-style-type: none"> <li>• Amendments to the rules sought to reflect impacts on access, parking and traffic generation</li> <li>• Feedback from the minerals sector around truck movements and their management within a Permitted Activity framework</li> <li>• Feedback seeking the period for rehabilitation post exploration to be extended to 12 months</li> <li>• Support for the mineral extraction management plan approach from the mineral sector but feedback on how this best can be used.</li> <li>• Concern that Schedule 9 could be misused (as it is a snapshot in time) and should not be referred to in a rule</li> </ul>

	<ul style="list-style-type: none"> <li>Restrictions around ancillary activities are considered too strict as these may push a mineral extraction activity to a higher consent requirement</li> <li>Seek allowance for temporary increases in heavy vehicles (Buller Coalfield Zone) where other parts of the network are unavailable</li> <li>BCML seek that mineral extraction outside of an overlay should be a controlled activity and within an overlay Restricted Discretionary</li> <li>Feedback that the reference to activities lawfully established at the time of notification of the plan is inappropriate – some feedback from the minerals sector that the time of lawful establishment is not relevant, also feedback from other people that the grandparenting of existing uses is inappropriate.</li> <li>Feedback that Permitted rule conditions are inadequate to ensure that adverse effects are more than minor.</li> <li>Relationship between the MINZ/BCZ rules and ECO/CE provisions needs to be clearer – there is confusion in the current wording</li> </ul>
General Rural Zone Policy	<ul style="list-style-type: none"> <li>Concern that the policy does not recognise existing residential activities within the rural areas and that because of previously approved development mineral extraction is not appropriate nearby. Seeks a 250m buffer of mineral extraction from any residence.</li> <li>Provide for a mechanism in policy to allow for additions to the MINZ or BCZ Special Zone</li> </ul>
General Rural Zone Rules	<ul style="list-style-type: none"> <li>14 people opposed the provisions for mineral extraction in the General Rural Zone.</li> <li>Issues raised principally were that the rules were too permissive of mineral extraction and the large area provided for as a Permitted Activity</li> <li>Specific concerns were raised about the monitoring of Permitted Activities – which generally does not occur at a District level and that breaches of Permitted Activity Rules would result.</li> <li>No maximum area provided for permitted exploration.</li> <li>The number of light and heavy vehicle movements is considered very high by some people</li> <li>The Controlled Activity for previously mined locations was specifically opposed by some submitters as they were considered too vague. This rule was supported by the minerals sector, though no sites were identified for inclusion in the schedule.</li> <li>Amendments to the rules to address traffic safety are sought</li> </ul>
Mineral Extraction in the Open Space Zone	<ul style="list-style-type: none"> <li>Provisions providing for mineral extraction in this zone are opposed by some people</li> <li>Minerals sector feedback seeks a similar framework to the General Rural Zone with a controlled or restricted activity for mineral extraction in this zone</li> <li>DOC feedback that mineral extraction provisions need to consider non-mapped SNAs</li> </ul>
Definitions	<ul style="list-style-type: none"> <li>Mineral definitions and overlay are confusing – should be a separation of extraction and processing from prospecting and exploration activities.</li> </ul>

## DISCUSSION

### General Approach

25. Feedback from the minerals sector was that the General Approach, with inclusion of Minerals Extraction Zone/Buller Coalfield Zone and provisions for mineral extraction in other zones was generally supported.

26. Other people and stakeholders who provided feedback generally opposed the general approach with 17 people specifically opposing the inclusion of Mineral Extraction Zones and three opposing the Buller Coalfield Zone specifically.
27. There are a range of reasons on both sides for the positions taken, with those supporting the approach emphasising the economic significance of mineral extraction to the West Coast, and those opposing it concerned that the balance was too significantly in favour of exploitation over environmental protection.
28. While these matters will no doubt be extensively canvassed during the submissions and further stages of the TTPP process, staff understand the Committee has set a strong direction around supporting Mineral Extraction. However in order for the provisions to be defensible, it is important that they are robust and withstand reasonable tests of the RMA. Key considerations in relation to this are:
  - a. Careful assessment of what sites are included within the Special Purpose Mineral Extraction and Buller Coalfield Zones to ensure that the direction and intent of the National Planning Standards is being met as well as the purposes of the RMA.
  - b. Careful consideration of rules – particularly Permitted and Controlled Activities (that they will still enable the TTPP to meet the Purpose of the RMA and address Section 6 and 7 matters).
  - c. Clear rules that mean that the sector is easily able to understand what requirements are being put in place through the Plan.
29. In relation to a) several people have challenged the creation of the Mineral Extraction Special Purpose Zone on the basis that it does not meet the tests of the National Planning Standards. Staff had originally proposed this as a Multi-zone Precinct – however due to the complexity of this type of provision, it was decided that a Special Purpose Zone was more appropriate. It is noted that other recently notified Plans have also included a number of Special Purpose Zones that are not specifically provided for within the National Planning Standards (e.g. New Plymouth Significant Facilities Zone, Porirua BRANZ Special Purpose Zone, Selwyn Dairy Processing Zone, Grasmere Zone, Knowledge Zone, Porters Ski Zone and Terrace Downs Zone) and within this context, staff consider it can be equally argued that a Mineral Extraction Zone meets the requirements of the National Planning Standards.
30. However staff have specific concerns around the inclusion of some specific sites within the Mineral Extraction Zone and their defensibility in meeting the criteria of being: Areas where there are discrete, long term mineral extraction activities currently authorised. This is discussed later in this report.
31. In relation to b) there is further discussion under the specific provisions around the rules in the Special Purpose Zone, General Rural Zone and Open Space Zones, however staff are concerned that, particularly as relates to the General Rural Zone, the draft rules may not meet the required tests under the RMA.
32. In relation to c) there are undoubtedly improvements that can be made to the clarity and consistency of the rules so that they are easily understood and applied. A number of changes are proposed to address this.

#### Barrytown Mineral Extraction Zone

33. The basis of identification of the Barrytown Mineral Extraction Zone in the draft Plan was the expectation that a resource consent would be granted prior to TTPP notification. This has not occurred therefore there is no lawfully established activity to justify the inclusion of the area in the zone. It is recommended that the Barrytown Mineral Extraction Zone be deleted.

#### Ross Goldfield Mineral Extraction Zone, Rimu Mineral Extraction Zone and other Alluvial Gold Mineral Extraction Zone Areas

34. Staff have now reviewed all the shape files and information provided on the alluvial gold proposed mineral extraction zone areas. It is considered that insufficient information (in terms of basis that they are considered lawfully established) has been provided for the alluvial gold areas proposed for inclusion in the zone. Specifically the GIS shape file information is not available to a sufficient level of detail to support a defensible location for the zone.

35. There is also a wider issue, that the Mineral Extraction Zone Rules were written with a framework of providing for mineral extraction activities that were very fixed in location, that there would be permissive rules for mineral extraction and that incompatible activities are discouraged. As identified above, the zone is specifically justified for areas that are expected to be used for mineral extraction for the life of the plan.
36. In relation to some of the draft alluvial gold areas, there are existing adjacent residential properties (at Ross) who would be substantially affected by the provisions – particularly the buffer requirements, but also the degree to which the activity is enabled within the zone.
37. There are also individual landowners within the zone that have identified that:
  - i. They have other aspirations for their property (including residential development);
  - ii. The mineral extraction activity is completed, or
  - iii. That the mineral extraction activity will only run for a few years.
38. These are all matters that are inconsistent with the intent of the zone.
39. It is also noted that almost all of the feedback opposed to the Mineral Extraction Zone was specifically concerned with the alluvial gold areas.
40. Staff consider that given the issues raised through the feedback, and as a result of closer examination of the areas suggested for inclusion in the zone, if alluvial gold areas are to be included in the Zone this will require a substantial revision of the rule framework. Such a revision will need to address a wide range of issues, and mean that the rules will need to be more restrictive than is currently drafted in the Plan, in particular if they are to allow for a wider range of non mineral extraction activities. The 250m buffer zone for restrictions on subdivision and development is also problematic when applied to the draft alluvial goldfield areas and given the extent of existing non mineral extraction uses within the area, would be unlikely to survive any challenge.
41. Given that there is a clear and intended pathway for mineral extraction in the General Rural Zone, staff consider that there is a strong risk that including the alluvial gold areas will undermine the wider Mineral Extraction Zone and recommend that these areas be excluded.

#### Additional Sites for Inclusion in the Mineral Extraction Zone

42. Feedback has sought that the following sites be included within the Mineral Extraction Zone:
  - a. The existing Karamea Lime Company Quarry
  - b. The existing Westland Schist Quarry
  - c. The existing Snowy River Hard Rock Gold Mine
  - d. The existing Globe Progress Hard Rock Gold Mine
43. These sites are all existing and operational quarries or mines, and are expected to be used for this purpose during the life of the Plan. Sufficient locational information has been provided that these areas are able to be accurately mapped and included in the Plan. Sufficient information on the basis of their lawful establishment has also been provided. In this respect these mines and quarries are considered to meet the criteria for inclusion in the zone and this is recommended.

#### Specific Provisions Buller Coalfield and Mineral Extraction Zones

44. There was a range of feedback on the specific policies and rules within these zones. Generally this was:
  - a. seeking a reduction in stringency
  - b. seeking an increase in stringency
  - c. seeking clarification and rewording to improve interpretation
  - d. seeking minor amendments that don't have a material effect on the stringency of the rule.
45. Staff do not propose any substantive changes to the rules in relation to the level of stringency. This is acknowledged as a matter that will be the subject of significant submissions and probably appeals. At that time the detailed arguments of the different stakeholders will be able to be examined on their merits
46. There are minor amendments to the policies and rules through the feedback from various parties that staff consider would improve the rules without having a major impact on stringency. Where possible these changes are recommended to be made.

47. Staff acknowledge that currently the rule wording in particular creates confusion in the relationship between the zone rules and the overlay rules and that rewording to better clarify the relationship is needed.
48. The general approach in the plan is that overlay provisions apply across all zones, so staff recommend the duplicated references within the zone rules be removed. There is also a need to clarify the relationship between the zone rules and the earthworks district – wide rules. Better cross referencing between objectives would also be an improvement and assist in plan interpretation.

#### Specific Provisions General Rural Zone

49. As discussed in paragraph 18 above, the Permitted Activity for mineral extraction in the General Rural Zone was a very late change prior to the draft being adopted and was not based on staff assessment of the potential impacts in relation to s6 matters. The 2ha area originally recommended allowed for a small operation whereby staff considered that, when combined with the other standards in the rule, it would enable effects of the activity to be less than minor.
50. Doubling the size of area able to be mined or quarried as a Permitted Activity may not meet these tests and the risk of more than minor effects is substantially increased. The staff recommendation is that the Permitted Activity be reduced to the originally proposed 2ha land area.
51. Several people raised the issue about impacts of new mineral extraction activity on existing residential activity within the General Rural Zone. This is a significant and valid concern, as these residential activities have been lawfully established and are a component of the zone. As drafted the Permitted Activity has 250m buffer requirements where Permitted Activities occur near a residential dwelling in a Residential, Settlement or Rural Lifestyle Zone. It is recommended that these requirements also apply to a residential dwelling in a General Rural Zone.
52. Minor amendments to the policies and rules that do not affect overall stringency are also recommended to be made to the provisions.
53. In terms of the Controlled Activity in areas identified as being previously mined, no feedback has been received identifying these areas. It is recommended that policy be included in the Plan to support this rule – that identifies where areas have been mined within the last 20 years they are appropriate for inclusion in this schedule. This may encourage submitters to come forward during the proposed TTPP submission period with suggestions for inclusion in the Schedule.

#### Open Space Zone

54. Generally staff do not recommend altering the stringency for mineral extraction in this zone.
55. However it is noted that there are some areas specifically set aside for mineral extraction under the Reserves Act (Local Purpose Quarry and Gravel Reserves). In these instances the winning of resources is a key part of the purpose of these locations. It is recommended that specific reference be made to Local Purpose Reserves for the purpose of quarrying or gravel abstraction and that similar Permitted Activity provisions as are found in the General Rural Zone be applied to these areas.

#### **RECOMMENDED CHANGES TO THE DRAFT TTPP**

Based on the feedback and the discussion above, the following changes are recommended to the draft TTPP:

- a. Include Karamea Lime Company Lot 1 DP 483059 and Section 1 SO15488 , Westland Schist Quarry, Snowy River Mine and Globe Progress Mine in the Mineral Extraction Zone.
- b. Remove Barrytown Mineral Extraction Zone from the Plan.
- c. Remove the alluvial gold mining areas identified in the draft Plan at Dunganville, Kumara, Ross, Rimu, Ianthe Forest and Greenstone from the Plan.
- d. Seek further information from Bathurst Resources and confirm the appropriate boundary of the Buller Coalfield Zone.

- e. Reduce the area for the Permitted Activity for Mineral Extraction in the General Rural Zone to 2ha.
- f. Include Residential dwellings within the General Rural Zone in the 250m buffer requirements for Permitted Activities.
- g. Provide additional policy guidance for the Controlled Activity in the General Rural Zone –that these areas should have been mined within the last 20 years.
- h. Provide a Permitted Activity for mineral extraction in the Open Space Zone where this is undertaken in Local Purpose Reserves for Quarrying or Gravel purposes.
- i. Other amendments to the policies, rules and definitions as sought in feedback where these are:
  - i. Minor amendments that do not materially increase or decrease the stringency; or
  - ii. Amendments that improve the clarity and ease of interpretation of the policies and rules
  - iii. Amendments that better align the wording of the policies with the West Coast Regional Policy Statement.



## Appendix One: Summary of Feedback Received on Mineral Extraction Provisions

Name/Organisation	Subtopic	Feedback
Oceana Gold	Mineral Extraction Zone – Add mine	<ul style="list-style-type: none"> <li>• Seek amendment to the mineral extraction zone criteria to encompass extraction of metallic minerals in addition to coal to allow for hard rock gold mineral extraction activities,</li> <li>• Include Oceana Gold’s Globe Progress gold mine at Reefton – now in closure as the Reefton Restoration Project – in the MINZ – Mineral Extraction Zone to demonstrate the full mine lifecycle of development, operation, and effective closure. Whilst it was operating the mine was authorised by a Mining Permit under the CMA and a suite of resource consents from Buller District Council and West Coast Regional Council (amongst other authorities), and as a Restoration Project it continues to function in compliance with resource consents. (Shape Files and information that could be included in Schedule 9 provided)</li> <li>• Seek inclusion of the Snowy River Mine in the MINZ – Mineral Extraction Zone and ‘Schedule 9 Lawfully Established Mineral Extraction and Processing Areas’ on the basis that current activities are authorised by a Minerals Permit under the CMA (MP 60473) and resource consents from Buller District Council (and West Coast Regional Council).</li> </ul>
Geoff Volkeman, Allwyn Gourley, John O’Connor, Joanne Milne, Kathleen Beveridge, Ken Kees, F & K Volckman, Joanne Galway, Karamea Lime Co, Nova Burt, Roger Gibson, Andrea Galway, Peter Langford, Gabrielle Wall and David Smith, SM Lowe Contracting, Jennifer Mathieson, William Simpson, Breydon Finlayson, Nathan Simpson, Catherine Smart-Simpson, Ayla Simpson, Brian Jones	Mineral Extraction Zone – Add mine	<ul style="list-style-type: none"> <li>• Include Karamea Lime Company Lot 1 DP 483059 and Section 1 SO15488 in Mineral Extraction Zone.</li> </ul>

Name/Organisation	Subtopic	Feedback
(all individual feedback)		
Cath and Glen Keleher	Arapito Road Quarry	<ul style="list-style-type: none"> <li>• Our shingle / yellow metal quarry is up the Arapito Road at Karamea, near the Zig Zag track, and we would like the zoning on our 2.5 hectares area to continue as it is at the moment (included in draft Mineral Extraction Zone) – this quarry is consented with the WCRC.</li> </ul>
Westland Schist	Mineral Extraction Zone – Add quarry Open Space Zone	<ul style="list-style-type: none"> <li>• Include existing quarry in South Westland in Mineral Extraction Zone ,</li> <li>• ensure rules within Open Space Zones and Activities on the Surface of Waterbodies allow for gravel abstraction in riverbeds</li> <li>• provide enabling provisions for small scale quarrying activities</li> </ul>
Federation Mining	Mineral Extraction Zone – Add mine	<ul style="list-style-type: none"> <li>• Seeks the Snowy River Mine located near Reefton off state highway 7 be included within the Mineral Extraction Zone.</li> <li>• Seeks that criteria for the zone specifically include extraction of hard rock gold mineral extraction in the zone in addition to coal.</li> <li>• Detailed information and shape file of mine included to support feedback.</li> </ul>
Suzanne Hill	Buller Coalfield Zone	<ul style="list-style-type: none"> <li>• Oppose coal zones</li> </ul>
John Caygill	Buller Coalfield Zone	<ul style="list-style-type: none"> <li>• Oppose Buller coalfield zone as is not necessary – current mining is already consented and authorised. The remaining area merits permanent protection as a rare ecosystem. While there is need for coking coal it does not merit the destruction of a special area. We should be winding down coal use in light of global warming. This is not something that could be offset or compensated for. The mine will close after a decade or two but a unique and significant will be destroyed forever.</li> </ul>
Department of Conservation	Buller Coalfield Zone Definitions Buller Coalfield/Mineral Extraction Zone Policy	<ul style="list-style-type: none"> <li>• Lawfully established – include reference to section 10 of the RMA in relation to existing use rights</li> <li>• Special Purpose Zones – _Mineral extraction zone/ Buller Coalfield zone considering combining the Buller Coalfield zone provisions with the general Mineral Extraction zone provisions to simplify the plan</li> <li>• Three policies that appear on the list in the Mineral Extraction zone chapter, MINZ – P6 to MINZ – P8, which seem to be missing from the BCZ chapter Policies BCZ – P5 and MINZ – P5</li> <li>• should include avoidance of adverse effects to allow scope for activities to be declined where protection of significant biodiversity cannot be achieved, and it is inappropriate to account for the loss through offsetting or compensation.</li> </ul>

Name/Organisation	Subtopic	Feedback
	Buller Coalfield/Mineral Extraction Zone Rules  Open Space Zone	<ul style="list-style-type: none"> <li>• Make explicit that ECO and CE provisions apply in the MINZ and BCZ. Wording of the controlled and RDA rules makes this unclear,</li> <li>• Seek rewording of MINZ – R6, MINZ – R7 and BCZ – R6 to make it clear that this applies to areas identified as significant through ecological assessment as part of an application process for indigenous vegetation clearance related to the mineral extraction activity it is important that this rule requires applicants to determine the significance indigenous biodiversity of a site, in order to determine compliance with the conditions of these rules.</li> <li>• Open Space Zone Rule OSZ – R19 states that Mineral Extraction Activities not meeting Rule OSZ – R11 are a Restricted Discretionary Activity where the activity does not occur within scheduled areas but this needs to consider non-mapped SNAs.</li> </ul>
Michael Morgan	Barrytown Mineral Extraction Zone	<ul style="list-style-type: none"> <li>• I do not want a mine extraction zone at Collins Creek or anywhere in Barrytown</li> </ul>
Sandy Passant	Barrytown Mineral Extraction Zone	<ul style="list-style-type: none"> <li>• Oppose Barrytown mineral extraction zone</li> </ul>
Andy Ellis	Barrytown Mineral Extraction Zone	<ul style="list-style-type: none"> <li>• Oppose Barrytown flats being deemed a mining zone. There is no appetite for this whatsoever in the community as witnessed by opposition to BJVL’s proposal even with limited notification. No mining project should be allowed without community input or feedback.</li> </ul>
Michael Hill	Barrytown Mineral Extraction Zone	<ul style="list-style-type: none"> <li>• In light of the recent (10/02/2022) decision by the West Coast Regional Council and the Grey District Council to decline the application by Barrytown JV for resource consents associated with the operation of an open cast sand mineral mine on the Barrytown Flats at 3261 Coast Road and adjoining properties (WCRC-RC-2020-0159 and GDC-LUN2926/20) on grounds of environmental and conservation values, amongst other things, it is inappropriate to designate these properties as “mineral extraction zones”. They should be zoned “Rural lifestyle” along with the rest of the Barrytown Flats.</li> </ul>
Lindy Mason	Barrytown Mineral Extraction Zone	<ul style="list-style-type: none"> <li>• Remove “Mineral Extraction Zone” from area adjacent to and encompassing 3261 Coast Road.</li> <li>• It has become clear with the recent failed application for a permit to mine this area that mining this area should not be granted automatically or of right. There are numerous competing values associated with this area. While a legal challenge of this decision is pending through the RMA, it would be inappropriate to pre-empt the outcome of this process. Mining in this area should be no more or less likely than any other area.</li> </ul>
Andrew Beaumont	Barrytown Mineral Extraction Zone	<ul style="list-style-type: none"> <li>• I am very dissatisfied with the zonings for mineral extraction around the paparazzi ranges and across the barrytown flats.</li> </ul>

Name/Organisation	Subtopic	Feedback
	General Approach	<ul style="list-style-type: none"> <li>I do not believe enough thought has gone into the environmental importance and value of these being more protected not less protected</li> </ul>
Trevor Hayes	General Approach Barrytown Mineral Extraction Zones	<ul style="list-style-type: none"> <li>Opposes the proposal for mineral extraction zones and the Barrytown Mineral Extraction Zone . This is on the on the following grounds. <ul style="list-style-type: none"> <li>Firstly, taking away adjoining landowners rights to object or modify mining applications when the activity has a direct bearing on aspects of their property, property value, hydrology, amenities, and existing business practices is completely wrong. People who live and who have invested in an area should have an opportunity to protect their investment whether it be the tranquility and outlook of their property, environmental amenity, or any potential financial losses. Individuals should have the right to seek modifications or object to mining applications where necessary and given the potential for long term environmental degradation.</li> <li>Secondly, there are wider community effects. The proposed change to the district plan to allow unfettered mining applications in extraction zones means entire communities can be hijacked by companies that ONLY have a financial stake in the area. Additionally, there are critical environmental factors that would be compromised on a long term basis. This includes both flora and fauna.</li> <li>Thirdly, Council's responsibility to the community is at stake. Shouldn't the Grey District council be doing more to look after its own communities and ratepayers rather than taking away their rights to object to a mining proposal that might greatly affect them and the environment.</li> <li>Fourthly, if a large amount of land is to be mined this ruling gives the applicants the right to mine the area piecemeal over time without the inconveniences of a resource consent process or any public input and this I believe is fundamentally wrong.</li> </ul> </li> </ul> <p>Finally, and in summary, this proposed change to the district plan gives more rights and ease of application to mining companies at the expense of the democratic rights of the communities and of individuals the GDC should be representing.</p>
Deb Landridge	General Approach, Barrytown Mineral Extraction Zone, General Rural Zone Rules	<ul style="list-style-type: none"> <li>I strongly oppose the proposal for mineral extraction zones. Taking away landowners rights to modify or object to mining operations on their boundary (by making them a Permitted Activity) is unacceptable.</li> <li>Barrytown- Collins creek -It is inappropriate to designate this farm a Special mine extraction Zone. This area is NOT a mine area. It is farmland and lifestyle blocks with very natural places all around, including adjacent SNA, DOC reserves and national park backdrop. A settlement of families live here- not an industrial site.</li> <li>The TPP enabling check-free mining is inappropriate, We should not be making it easier for them not to care.</li> </ul>

Name/Organisation	Subtopic	Feedback
Kathryn Cannan	General Approach Barrytown Mineral Extraction Zone	<ul style="list-style-type: none"> <li>• I am opposed to any rule or law changes that would make it easier than the current situation for existing mines to be expanded or new mines and exploration to be undertaken.</li> <li>• I am opposed to this on the following grounds:               <ol style="list-style-type: none"> <li>1. It is my understanding that the maps included in the exposure draft are inadequate for people to be able to tell whether their property would be affected by the proposed changes. Therefore, the deadline for comments needs to be extended until the maps are adequate and available.</li> <li>2. I am aware of the harm over months that was caused to those of us living along the Coast Road related to the Barrytown JV application (I uncertainty of the future for their property and lifestyle, potential need to relocate, potential exposure to dust, noise, disruption, increased truck traffic along State Highway 6 from the Westport/Murchison crossroads south to Runanga....in other words, a large number of households and people. The potential that we might need to revisit this increases anxiety.</li> <li>3. There seems to be scant recognition that increasing the ability for more new, and expanded existing, mines will negatively affect NZ's commitments to the Paris Accords through increased green house gas emissions.</li> </ol> </li> </ul>
Michelle Radford	General Approach Barrytown Mineral Extraction Zone	<ul style="list-style-type: none"> <li>• Oppose mineral extraction zones</li> <li>• Opposes Barrytown mineral extraction zone</li> </ul>
Craig Findlay	General Approach Barrytown Mineral Extraction Zone	<ul style="list-style-type: none"> <li>• Oppose the proposal for mineral extraction zones and Barrytown Mineral Extraction Zone. This is on the on the following grounds.               <ul style="list-style-type: none"> <li>• Firstly, taking away adjoining landowners rights to object or modify mining applications when the activity has a direct bearing on aspects of their property, property value, hydrology, amenities, and existing business practices is completely wrong. People who live and who have invested in an area should have an opportunity to protect their investment whether it be the tranquility and outlook of their property, environmental amenity, or any potential financial losses. Individuals should have the right to seek modifications or object to mining applications where necessary and given the potential for long term environmental degradation.</li> <li>• Secondly, there are wider community effects. The proposed change to the district plan to allow unfettered mining applications in extraction zones means entire communities can be hijacked by companies that ONLY have a financial stake in the area. Additionally, there are critical environmental factors that would be compromised on a long term basis. This includes both flora and fauna.</li> </ul> </li> </ul>

Name/Organisation	Subtopic	Feedback
		<ul style="list-style-type: none"> <li>• Thirdly, Council's responsibility to the community is at stake. Shouldn't the Grey District council be doing more to look after its own communities and ratepayers rather than taking away their rights to object to a mining proposal that might greatly affect them and the environment.</li> <li>• Fourthly, if a large amount of land is to be mined this ruling gives the applicants the right to mine the area piecemeal over time without the inconveniences of a resource consent process or any public input and this I believe is fundamentally wrong.</li> <li>• Finally, and in summary, this proposed change to the district plan gives more rights and ease of application to mining companies at the expense of the democratic rights of the communities and of individuals the GDC should be representing.</li> </ul>
Olivera Angelovska	General Approach Barrytown Mineral Extraction Zone	<ul style="list-style-type: none"> <li>• Oppose the proposal for the proposed mineral extraction zones and Barrytown Mineral extraction zone outlined in the TTPP draft plan.</li> <li>• This affects locals and landowners as it takes away our rights to object or modify mining applications even if it directly impacts us. This includes effects on the visual landscape, noise, ecology as well as property, property value.</li> <li>• We should have rights to seek modifications or object to mining applications.</li> <li>• This has the potential to allow rural quiet villages to turn into industrial zones.</li> <li>• The GDC Draft plan will exclude locals from having a say in mining proposals that directly or indirectly effect us</li> <li>• This proposed change to the district plan gives rights and paths the way for mining companies at the expense of the community. The Council needs to listen to needs of ratepayers not international businesses who do not care about communities."</li> </ul>
Geoff Broad	General Approach Barrytown Mineral Extraction Zone	<ul style="list-style-type: none"> <li>• Oppose the proposal for the proposed mineral extraction zones and the Barrytown Mineral Extraction Zone outlined in the TTPP draft plan.</li> <li>• This affects locals and landowners as it takes away our rights to object or modify mining applications even if it directly impacts us. This includes effects on the visual landscape, noise, ecology as well as property, property value.</li> <li>• We should have rights to seek modifications or object to mining applications.</li> <li>• This has the potential to allow rural quiet villages to turn into industrial zones.</li> <li>• The GDC Draft plan will exclude locals from having a say in mining proposals that directly or indirectly effect us</li> <li>• This proposed change to the district plan gives rights and paths the way for mining companies at the expense of the community. The Council needs to listen to needs of ratepayers not international businesses who do not care about communities."</li> </ul>

Name/Organisation	Subtopic	Feedback
David Morris	Barrytown Mineral Extraction Zone, General Approach  General Rural Zone Rules	<ul style="list-style-type: none"> <li>• Oppose Mineral Extraction Zones.</li> <li>• Oppose inclusion of Barrytown proposed mine area in Mineral Extraction Zone.</li> <li>• Oppose 4ha Permitted Activity mineral extraction in General Rural Zone.</li> </ul>
Lynley Hargeaves	Ross mineral extraction zone  General Approach  General Rural Zone Rules	<ul style="list-style-type: none"> <li>• Oppose the proposed Mineral Extract Zone (MEZ) partially surrounding the Ross township.</li> <li>• The zone will stifle other forms of development such as housing, and the proposed zone does not allow for community feedback on mining activities, council oversight of mining, or protect the environment.</li> <li>• MEZ prevents housing - Residential activities are non-complying within the MEZ, which would prevent almost any further housing in areas immediately surrounding Ross. It would also prevent subdivision for residential activities within 250m of the MEZ – which means part of Ross and most of the beach subdivision area would be prevented from further subdividing land for housing.</li> <li>• Believes mineral extraction zone does not meet the National Planning Standards, as special purpose zones should be for activities that cannot be managed in other zones. This is clearly not the case for most mining activity, which is proposed to be managed in multiple zones (including the settlement zone).</li> <li>• Most of the proposed MEZ will not be used for mining, since it includes areas that have already been mined or will never be mined.</li> <li>• Conversely, most mining in the next decade around the Ross area will occur outside the MEZ – alluvial gold mining is by its very nature an activity which moves often.</li> <li>• The Ross MEZ and likely all MEZs (certainly for alluvial gold mining) should be removed entirely.</li> <li>• General Rural Zone Rules for mining – The exposure draft leans heavily towards pushing mining into permitted activity status where a resource consent is not required.</li> <li>• Because permitted activities are not monitored by Council, this will result in much more mining happening with no oversight and would increase the amount of illegal mining (mining that operates under the permitted activity rules, but breaches those rules). Instead mining should be (as it is for most Councils and as it is in the current Westland Plan) a restricted discretionary or discretionary activity.</li> <li>• The current Westland rules are interpreted to allow some drilling and test pit operations as permitted activities, which seems reasonable.</li> <li>• All other mining activity should require resource consents as they do under the current plan, and all rules in the draft plan should be altered so they are no more lenient than the current Westland plan’s rural zone rules.</li> <li>• It is important Council is involved with mining consents so that removal of indigenous vegetation, exposed area size, and other effects can be monitored and managed.</li> </ul>

Name/Organisation	Subtopic	Feedback
		<ul style="list-style-type: none"> <li>• Reverse sensitivity - The reasoning given in the draft plan for mining zones is to avoid reverse sensitivity, with the apparent argument that new people living rurally may create complaints against rural activities. The plan's solution involves essentially strangling Ross and preventing rural living Coastwide. It is also solving a problem that does not really exist. In and around Ross there has been considerable mining very close to housing with very little trouble – impacts have been managed well through the resource consent process with creating bunds and removing backing beeps (for noise), putting workers in one vehicle to avoid a large increase in traffic, spraying water on a road (for dust), and putting in a corner mirror.</li> <li>• These things can all be well managed through rules in the plan so that mining and people can co-exist.</li> <li>• Instead the vast majority of complaints have been about illegal and/or environmental damaging mining activity – for example mining outside the area of consent, having a larger than allowed area of disturbed ground, undercutting a forested hillside, or draining sediment-laden water into creeks and coastal lagoons. The solution to this is better Council oversight of resource consents, not removing the need for mining to get a resource consent so there is no oversight at all.</li> <li>• Making resource consents into permanent permitted activities MINZ – R2 and BCZ – R2 appear to give indefinite permitted activity status to a wide range of mining 'consents', stating that activities which are lawfully established at the time of notification will become permitted activities.</li> <li>• This appears to mean that all mining consents at the time of notification would become permitted activities for the life of the TTPP plan, and no longer need their resource consents. It suggests we would end up in the confusing and nonsensical situation of dozens of different complex permitted activity rules for different locations, where consented mines suddenly cease to have their resource consent conditions time limits (I how many years until rehab) apply and any conditions monitored (because it is now permitted). It's hard to imagine how this would work with rehab timeframes, nor what it would mean to have mining consents still operating as permitted activity rules years after mining has actually stopped.</li> <li>• Nowhere has the plan explained why a mine that has resource consents needs those consents to be changed into a permanent permitted activity status. Instead, it seems likely this rule is not in fact mainly directed at mines with resource consents, but instead at Mining Licences.</li> <li>• These licences predate both the Crown Minerals Act and the Resource Management Act, continue to operate as if neither of those Acts had ever passed, and give the land use rights that are now be managed by District Councils. Most of these have now expired, but the Mining Licences which remain active around New Zealand have a complex array of outdated environmental conditions and were subject to a Parliamentary commissioner for the Environment (PCE) report in 2009. The TTPP now appears to be proposing to make these outdated and inadequate Licences, most of which are due to expire in the next 5 years, into permanent permitted activities.</li> </ul>



Name/Organisation	Subtopic	Feedback
		<ul style="list-style-type: none"> <li>• Turning these into permanent permitted activities is unworkable, unclear, and fails to protect the environment. Instead Mining Licence holders should move into the 21<sup>st</sup> century and apply for resource consent for their operations when their Licences expire.</li> <li>• Previously mined locations – Proposed special rules for previously mined locations is exceptionally unclear since it is not stated whether this is intended to mean areas that have mined in the last two decades (for example), or areas that were mined in the 1860s. Regardless of that, this is an unworkable provision since any attempt to have a list of areas previously mined within even the last few decades would never be a full list and would rapidly date. This should be removed.</li> </ul>
Brian Anderson	Ross mineral extraction zone, General Rural Zone Rules General Approach Open Space Zone	<ul style="list-style-type: none"> <li>• Open Space Zones – Mineral extraction should not be provided for in the OSRZ.</li> <li>• Mineral Extraction – seeks that instead of reducing scrutiny of mining the plan should encourage a more responsible mining industry, by encouraging best practise, ensuring a robust consenting system, and ensuring adequate compliance.</li> <li>• On the West Coast at present, the only part of this 'trifecta for success' in place at present is a relatively robust consenting system. The TTPP should maintain or enhance this robust consenting system.</li> <li>• The proposed Mineral Extraction Zone fails the mandatory directions of the National Planning Standards in relation to Special Zones. This failure is clear, and evidenced by the fact that mineral extraction is managed through the General Rural Zone in the TTPP, and has been managed in the Rural Zone of the West District Plan successfully for many years.</li> <li>• The MEZ fails to protect the natural and physical resources in it, because it allows large-scale (in fact, unlimited scale) mining within the zone. It appears to delegate many of the relevant considerations for a resource consent to a Management Plan, which is to be provided to the relevant council for 'certification'. In reality there is no requirement in the plan for the substantive content of the Management Plan, beyond using a particular template (Appendix 7).</li> <li>• The overall effect, for a township like Ross, surrounded by a MEZ, is that it will be come 'frozen in time'.</li> <li>• Much of Ross would be subject to strict rules on subdivision and residential activity (as much of Ross is with 250 m of the proposed mineral exclusion area).</li> <li>• Outside of Ross, development is severely restricted by the Mineral Extraction Zone itself. This restriction is odd, as much of the land has already been mined, but it would now be very difficult to build a house on (or almost any other activity) because of the extraordinarily restrictive plan rules.</li> <li>• The mineral extraction zones should be removed, as they: are an attempt to fix a problem that does not exist as it is straightforward to get a resource consent for mineral extraction on the West Coast. The number of declined applications is vanishingly small.</li> <li>• The proposed standards for a permitted activity are extraordinarily lax, and fail Part 2 of the RMA. There is no limit on size of permitted exploration activities in GRUZ – R11 (compared with current Westland</li> </ul>

Name/Organisation	Subtopic	Feedback
		<p>District Plan, which has a confusing, but limited, 50 m rule) the area of disturbance rule under GRUZ-R12 (4 ha) is extremely large, and will result in significant adverse effects</p> <ul style="list-style-type: none"> <li>• The number of light and heavy vehicle movements under GRUZ-R12 is very high, and could not occur on many rural roads on the West Coast without significant adverse effects on roads, road safety, and dust.</li> <li>• The controlled rule for Mineral Extraction in the Rural Zone (GRUZ-R18) should be removed. We have not been provided with a list or map of historically mined areas. The idea that historically mined areas should be for some reason more permissive for modern mining is a flawed concept, and unworkable in practise.</li> </ul>
Sharon Langridge	Barrytown Mineral Extraction Zone, General Rural Zone Rules	<ul style="list-style-type: none"> <li>• Special Purpose Zone – Mineral Extraction Zone – 3261 Coast Rd, Barrytown. I am concerned that there is a strong bias in favour of mining. Even in areas where mining does not currently exist such as 3261 Coast Rd, Barrytown.</li> <li>• It appears the plan will generally put the needs of mining before the needs of existing neighbouring farms, residences and other businesses in regards to both the Mineral Extraction Zone and General Rural Zones.</li> <li>• Allowing 4 hectares of mining to be done as a permitted activity without requiring resource consent is concerning and irresponsible. Neighbours will have no rights to object.</li> <li>• Mining can negatively impact on Farming practices, property values, amenity values, hydrology, ecology &amp; Tourism.</li> <li>• Allowing mining as a permitted activity with no consent will effectively give them more rights than the everyone in the community who potentially be impacted by this industrial activity.</li> </ul>
Noel McEwan	Paparoa Mineral Extraction Zone	<ul style="list-style-type: none"> <li>• Regarding the mineral extraction zone proposed for the Roa area.</li> <li>• I have concerns regarding the proximity of the zone to residential properties and the devaluation of said properties if this zoning goes ahead. The residents of Roa have already be subjected to 30 plus years of dust and noise from an existing mining operation with very little mitigation to alleviate those problems. I see that the towns water supply is within the proposed mineral extraction zone and have concerns regarding the future quality of our drinking water if this goes ahead. I have had to relocate the intake of that supply 3 times over the last 30 years from pollution from the existing coal mine and don't wish to repeat it.</li> <li>• The future of the coast is not in its minerals but in its environment and its quality of life that that environment can offer. With high speed broadband like star link and other services there is a move around the world in most western democracies of people moving out of the main cities and into small rural communities. There they can work from home and have a quality of life that is not available in major cities. The future of work is changing rapidly and we need to anticipate those changes."</li> </ul>

Name/Organisation	Subtopic	Feedback
Ross Community Society	Ross Mineral extraction zone.	<ul style="list-style-type: none"> <li>• It is the wish of the community residents that the current guidelines in force around Ross be maintained as the status quo.</li> <li>• Any regulations currently give all property owners the ability to do with their privately owned land, what they wish (I., mine via the appropriate licences)</li> </ul>
Julie Madigan	Ross Mineral extraction Zone	<ul style="list-style-type: none"> <li>• We do not need nor want a Mining Extraction Zone, with current regulations providing everyone in/around Ross township protections concerning development, ie., mining.</li> <li>• Please accept this submission/feedback as NOT supporting any change to the current designation of land immediately adjacent to the Ross Settlement Zone. We DO NOT need / want any change to current zoning regulations.</li> </ul>
Alistair Cameron	Rimu Mineral Extraction Zone General Approach	<ul style="list-style-type: none"> <li>• "This feedback relates to zoning as has been applied to my properties in the Arthurstown, Woodstock &amp; Rimu Areas.</li> <li>• While I support the concept of the Mining Extraction Zones, there should be scope for fallback to alternative (appropriate) zones when mining is complete or proven unviable.</li> <li>• In the area of Arthurstown I have a mining permit 60369 as shown the attached print of NZP&amp;M permit map. It is anticipated that this land will be mined in the foreseeable future and therefore should be included in the Minerals Extraction Zone.</li> <li>• On completion of mining this land could be used for Rural Lifestyle if economic conditions allow.</li> <li>• Therefore it would be appropriate to Zone the immediate surrounding area as Rural lifestyle, as this would fit in with adjoin and adjacent zones that allow residential activities.</li> <li>• To the south, in the Woodstock – Rimu area I have mining permit 41539 (see attached); mining activity is likely in the foreseeable future. Therefore the Minerals Extraction Zone in appropriate in that particular area.</li> <li>• However the land to the north (the lower terraces towards Woodstock) has been mined by myself and there are no known resources remaining in that area.</li> <li>• Further, the land to the east (high terraces towards Rimu) any mineral deposits would be at depths that are unviable.</li> </ul>
Forest and Bird	General Approach Buller Coalfield Zone General Rural Zone Rules Mineral Extraction Zone Rules	<ul style="list-style-type: none"> <li>• Mineral Extraction - The draft Plan appears to consider mineral extraction as lawfully established where a DOC concession or historic disturbance has occurred as identified in SCHED 9 Lawfully Established Mineral Extraction and Processing Areas.</li> <li>• An approval under other legislation does not constitute lawful under the RMA.</li> <li>• Nor does historic disturbance necessarily make an activity lawful under the RMA, even if existing use can be determined this is not without limitations.</li> <li>• Permitted rule conditions are inadequate to ensure that adverse effects are more than minor. In many cases the conditions would be unenforceable with the onus of proof siting with the council rather than the user.</li> </ul>

Name/Organisation	Subtopic	Feedback
		<ul style="list-style-type: none"> <li>• Forest &amp; Bird considers that the two zones BCZ and MINZ are inappropriate.</li> <li>• Applying this zoning over Public Conservation Land which is held for conservation purpose under another statute is absurd. This suggests that mining overrides the conservation purpose for which the land is held.</li> <li>• Permitting mineral extraction on the basis of being lawfully established at the time of notification is inappropriate. This does not ensure that adverse effects are no more than minor. It undermines the purpose of consent duration whereby activities will be reconsidered under new planning requirements and with the latest information available.</li> <li>• The Mineral definitions overlap and are confusing. They do not enable extraction and processing to be addressed separately from prospecting and exploration activities are too broad and detract from the common meaning of a term</li> </ul>
Birchfield Coal	General Approach Mineral Extraction Zone Rules General Rural Zone Rules Mineral Extraction in the Open Space Zone	<ul style="list-style-type: none"> <li>• Supports that the TTPP seeks to be enabling of mineral extraction, including through the use of a Mineral Extraction Zone (MEZ). However, BCML is concerned that the TTPP intention to enable mining in the Districts will not be established in practice and that the TTPP remains unduly restrictive.</li> <li>• BCML seeks a clear consenting pathway for both its established and proposed mining activities on the West Coast, regardless of which zone its activities are located in.</li> <li>• Seeks one activity status for mining activities (including for ancillary earthworks and removal of any indigenous vegetation) regardless of overlays and any other rule breaches in related chapters.</li> <li>• Seeks either a controlled or restricted discretionary rule for mining activities across the Mineral Extraction, Rural and Open Space zones.</li> <li>• To enable a consenting pathway, at worst, across the whole TTPP, mining and its associated activities should be a discretionary activity.</li> <li>• The TTPP needs to be clear that effects of activities fixed in location, such as mining, can often not be avoided, but can be mitigated by offsetting and compensation to ensure acceptable effects on the environment.</li> <li>• BCML support the introduction of the MEZ, and the provisions contained within the MEZ.</li> <li>• Mining is sufficiently enabled within the MEZ and MINZ-R7 should ensure that the restricted discretionary rule operates with restricted discretion and is not in effect a discretionary rule. There needs to be further limitation of the current broad range of discretion.</li> <li>• BCML consider that mineral extraction outside of an overlay can be effectively managed as a controlled activity in the MEZ, and mineral extraction within an overlay can be effectively managed as a restricted discretionary activity so long as the matters of discretion appropriately address visual amenity, natural character and protection of significant indigenous fauna and flora.</li> </ul>

Name/Organisation	Subtopic	Feedback
		<ul style="list-style-type: none"> <li>• With regard to the mineral extraction framework outside of the MEZ, the TTPP intends mineral extraction to be enabled in the General Rural and Open Space zones – _which BCML supports. However, BCML considers that:               <ol style="list-style-type: none"> <li>a. the matters of discretion detailed in the restricted discretionary mineral extraction rules cover such a wide-ranging number of effects that the rules are in essence discretionary;</li> <li>b. mineral extraction within any overlays can be effectively managed as a restricted discretionary activity with appropriate matters of discretion; and</li> <li>c. the relationship these zones have with districtwide matters, such as indigenous biodiversity and earthworks, may mean that activities are not sufficiently enabled.</li> </ol> </li> </ul>
Sophie Allan	General Approach	<ul style="list-style-type: none"> <li>• I oppose the proposal for mineral extraction zones on these grounds.               <ul style="list-style-type: none"> <li>• Taking away adjoining landowners rights to object or modify mining applications when the activity has a direct bearing on aspects of their property, property value, hydrology, amenities, and existing business practices is completely wrong and in my opinion immoral. People who live and who have invested in an area should have an opportunity to protect their investment whether it be the tranquility and outlook of their property or any potential financial losses. They should have the right to seek modifications or object to mining applications where necessary.</li> <li>• Wider community effects. The proposed change to the district plan to allow unfettered mining applications in extraction zones means entire communities can be hijacked by companies that ONLY have a financial stake in the area.</li> <li>• Council’s responsibility to the community. Shouldn’t the Grey District council be doing more to look after its own communities and ratepayers rather than taking away their rights to object to a mining proposal that might greatly affect them and the environment. The GDCs decision to restrict public notification on the recent BJV Mining application in Barrytown showed how out of touch they were to public opinion on this matter. A petition calling for public notification of the BJV Mining application collected 168 signatures. We are already feeling excluded from the decision making process and the GDC Draft plan seeks to exclude us further.</li> <li>• If a large amount of land is to be mined this ruling gives the applicants the right to mine the area piecemeal over time without the inconveniences of a resource consent process or any public input and this I believe is fundamentally wrong.</li> </ul> </li> <li>• In summary this proposed change to the district plan gives more rights and ease of application to mining companies at the expense of the democratic rights of the communities the GDC should be representing.</li> </ul>
Bathurst Resources	General Approach	<ul style="list-style-type: none"> <li>• Bathurst generally supports the spatial layers and the intention of the Special Purpose Zones, in particular the Buller Coalfield (BCZ) and Mineral Extraction Zones (MINZ) and the Objectives and Policies for these zones and the enabling approach that is being sought. Notwithstanding this approach, it does appear that</li> </ul>

Name/Organisation	Subtopic	Feedback
	Buller Coalfield Zone Rural Zone Policy Buller Coalfield Policy Buller Coalfield Rules	<p>most of the BCZ is also subject to the general rules in the plan creating confusion as to what standard takes precedence and potentially undermining the enabling provisions of that zone. Bathurst's preference would be for the provisions of the Special Purpose Zones to take precedence as these areas have been zoned with a particular intention in mind.</p> <ul style="list-style-type: none"> <li>• The Denniston Plateau is zoned Open Space Zone (OSZ), While acknowledging the openness and predominantly natural character of this zone, mining currently exists and further mining is planned within the area. Bathurst considers that the Denniston Plateau would be more appropriately zoned as RURZ or BCZ. BCL suggests that to be consistent with P24, the Upper</li> <li>• Waimangaroa Valley and Denniston Plateau be added to the BCZ. In addition it is suggested that RURZ – P24 be amended by including the BCZ</li> <li>• RURZ – P24 When mineral resources of regional or national significance are identified, consider including</li> <li>• these areas within the MINZ -Mineral Extraction Zone or the BCZ – Buller Coalfields Zone.</li> <li>• BCZ – P1 Bathurst would prefer to remove the term “current authorised” from this policy. Our understanding is that all mining activities within the BCZ are intended to be permitted to continue. This creates confusion as to when the “Current authorised” takes effect.</li> <li>• BCZ – R2 While Bathurst does not oppose the inclusion of a Mineral Extraction Management Plan as a requirement of a permitted activity, certification of this plan should not be used to place controls or restrict or prevent the activity from occurring. Certification should be directed at ensuring that all relevant matters have been included in the Plan and certification cannot be used as a mechanism to delay or prevent the mining activities from progressing, in accordance with the general provision of the permitted activity status. Include a new clause BCZ-R2 2(a.)(v) The certification process must be confined to confirming that the final MEMP adequately gives effect to the relevant rules</li> <li>• BCZ – R3 Bathurst has concern with some of the specific provisions of this rule and would prefer a more general approach whereby the activities that are lawfully established at the time of notification should be able to continue in their existing state. This would extend to the location and height of buildings.</li> <li>• BCZ -R4 Allow for temporary increases in heavy vehicles where other parts of the network are unavailable (e.g. due to weather related infrastructure damage). Clarify that heavy vehicle controls are movements to and from the site, not within the site</li> <li>• BCZ – R5 Amend to cover ancillary activities associated with BCZ – R3 or create an additional Controlled Activity Rule</li> </ul>
Kathy Gilbert	General Rural Zone Rules Open Space Zone	<ul style="list-style-type: none"> <li>• No mining should be allowed in any open space zone</li> <li>• General Rural Zone is too permissive of mining and too restrictive of other uses,</li> </ul>

Name/Organisation	Subtopic	Feedback
NZ Coal and Carbon	General Approach Mineral Extraction Zone Rules	<ul style="list-style-type: none"> <li>• We support:               <ol style="list-style-type: none"> <li>a. that the TTPP seeks to enable mineral extraction activities within the Districts. But, we have some concern that in practice the TTPP could unintentionally and unnecessarily restrict these activities.</li> <li>b. the inclusion of Strategic Objectives for Mineral Extraction and the associated directive for their application.</li> <li>c. the inclusion of a Mineral Extraction Zone (MINZ) as well as the enabling provisions for mineral extraction activities throughout the TTPP</li> </ol> </li> <li>• Mineral Extraction Zone Rules: MINZ – R1 increase timeframe to 1 year (from 3 months) for rehabilitation post exploration/prospecting</li> <li>• MINZ – R2 – refer to schedule 9 as an advice note or not at all – as this schedule is “static in time” , delete reference to “coal mining licence or resource consent” and amend to “existing authorisations” – recognising some activities were legal established under other methods</li> <li>• Re Mineral Extraction Management Plan (Appendix 7) insert an Advice Note to say something along the lines of ... this process of certification is not to relitigate matters rather to check that what is required is there.</li> </ul>
Straterra	General approach Buller Coalfield/Mineral Extraction Zone Rules Open Space Zone	<ul style="list-style-type: none"> <li>• Support the Strategic Objectives – have stronger links to these in the Overlay chapters</li> <li>• Ensure there is a consenting pathway for mineral extraction in Overlay areas</li> <li>• Support the Mineral Extraction and Buller Coalfield Zones</li> <li>• Consider that in these zones the restrictions around ancillary activities are too strict</li> <li>• Ensure Mineral Extraction Management Plan does not duplicate other regulatory plans required</li> <li>• Schedule Nine lists lawfully established mineral extraction and processing areas within the Buller Coalfield and Mineral Extraction Zones. It is not clear how this schedule will be used or how it is linked to the plan. There are significant risks that it may be seen as a comprehensive list which means anything left off the list could be disadvantaged and care needs to be taken with any links or references to the schedule as the plan evolves.</li> <li>• Schedule 10 is to include a list of the locations of previously mined areas in the Rural and Open Space and Recreation Zones. It is currently empty. These areas would need to be identified as part of the submission process. We recommend that the plan writers are open to receiving suggestions after the submission due date in the period leading up to notification of the plan, and beyond as part of the formal submission process</li> <li>• We support mineral extraction on sites in previously mined areas as being a controlled activity.</li> <li>• NOSZ-R16 and NOSZ-R17 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</li> </ul>

Name/Organisation	Subtopic	Feedback
		<p>mechanisms in place for some land held in this zone, for example an access arrangement with the Department of Conservation.</p> <ul style="list-style-type: none"> <li>• Rules: MINZ – R1/GRUZ – R11/OSZ – R11 increase timeframe to 1 year (from 3 months) for rehabilitation post exploration/prospecting</li> <li>• MINZ – R2 – refer to schedule 9 as an advice note or not at all – as this schedule is “static in time” , delete reference to “coal mining licence or resource consent” and amend to “existing authorisations” – recognising some activities were legal established under other methods</li> <li>• Re Mineral Extraction Management Plan (Appendix 7) insert an Advice Note to say something along the lines of ... this process of certification is not to relitigate matters rather to check that what is required is there.</li> <li>• MINZ -R3 truck movements of 30/day is an unnecessary duplication of requirements in MINZ-R2, is extremely restrictive, and is covered under the Noise rules.</li> </ul>
Minerals West Coast	General approach	<ul style="list-style-type: none"> <li>• Minerals West Coast supports the six strategic objectives that have been outlined in the exposure draft for the plan, and notes that other objectives and policies in all other chapters are to be read in a manner consistent with the Mineral Extraction Strategic Objectives.</li> <li>• Propose a separate Mineral Extraction Chapter with its own set of policies and rules</li> <li>• Seeks clarification about relationship between mineral zone chapters and overlays and seeks to ensure that there is a consenting pathway following the effects management hierarchy where there are overlay features present</li> <li>• Minerals West Coast supports the enabling intent of the Minerals Extraction Zones (noting that it is anticipated there will be mining outside of these defined zones) and the provision for lawfully established mineral extraction and processing areas</li> <li>• given the possibility some minerally prospective areas or lawfully established activities may have been inadvertently left out of these zones/schedules, provision for retrospective addition to these areas should be written into the plan provided a case can be made for doing so.</li> <li>• Mechanisms for addition of new Mineral Extraction Zones to the plan should be considered, including but not limited to plan changes.</li> </ul>
Annie Inwood	General Rural Zone Rules, Mineral Extraction Zone Rules	<ul style="list-style-type: none"> <li>• Opposes Permitted Activity for mineral extraction in Rural Zones and Mineral Extraction Zone</li> </ul>
Don Kerr	General Approach	<ul style="list-style-type: none"> <li>• I vehemently oppose the proposal for mineral extraction zones. This is on the following grounds.</li> </ul>



Name/Organisation	Subtopic	Feedback
		<ul style="list-style-type: none"> <li>• Firstly, taking away adjoining landowners rights to object or modify mining applications when the activity has a direct bearing on aspects of their property, property value, hydrology, amenities, and existing business practices is completely wrong. People who live and who have invested in an area should have an opportunity to protect their investment whether it be the tranquility and outlook of their property, environmental amenity, or any potential financial losses. Individuals should have the right to seek modifications or object to mining applications where necessary and given the potential for long term environmental degradation.</li> <li>• Secondly, there are wider community effects. The proposed change to the district plan to allow unfettered mining applications in extraction zones means entire communities can be hijacked by companies that ONLY have a financial stake in the area. Additionally, there are critical environmental factors that would be compromised on a long term basis. This includes both flora and fauna.</li> <li>• Thirdly, Council's responsibility to the community is at stake. Shouldn't the Grey District council be doing more to look after its own communities and ratepayers rather than taking away their rights to object to a mining proposal that might greatly affect them and the environment.</li> <li>• Fourthly, if a large amount of land is to be mined this ruling gives the applicants the right to mine the area piecemeal over time without the inconveniences of a resource consent process or any public input and this I believe is fundamentally wrong.</li> <li>• Finally, and in summary, this proposed change to the district plan gives more rights and ease of application to mining companies at the expense of the democratic rights of the communities and of individuals the GDC should be representing.</li> </ul>
Evelyn Hewlett	General Approach	<ul style="list-style-type: none"> <li>• I oppose the mineral extraction zones as this eases the way for premature and not comprehensively assessed proposals for mining to be granted without consultation by way of public notification, even for those 'directly affected'.</li> <li>• I fear this TTP plan will herald a plethora of ill planned mining activity and local resident voices and the environment will over-riden, rough shod by a 19thC gold rush mind set.</li> </ul>
Christine Robertson	General Approach Mineral Extraction Zone Rules General Rural Zone Rules	<ul style="list-style-type: none"> <li>• I am concerned by the mineral extraction zoning and the little concern that appears to being given to the rights of residents who might be affected. I can accept that if one buys a property with a mine or similar in the vicinity then one must accept the issues that could go with its existence and maybe even predictable expansion.</li> <li>• I am totally against any new mining activity in any of the proposed rural areas being able to happen with no input from the potentially affected residents in the locality including those who could be affected by issues other than the on site activities such as noise vehicular movement etc</li> </ul>

Name/Organisation	Subtopic	Feedback
Alex Grove-Hills	General Rural Zone Rules	<ul style="list-style-type: none"> <li>I do not agree with the idea to change rural zoning rules allowing extraction of materials a permissible activity without the rights of the immediate neighbour's or the greater community to be heard.</li> <li>Rural living with the odd seasonal noise from farming machinery is one thing, Processing plants and machinery running 24/7 is industrial and should be zoned accordingly.</li> </ul>
Andrzej Suchanski	General Rural Zone Rules	<ul style="list-style-type: none"> <li>I am very concerned about the proposal to allow mining without any consents etc.</li> </ul>
Brenda Kaye	General Rural Zone Rules	<ul style="list-style-type: none"> <li>In the General Rural Zone the rules allow for a 4ha area of mineral extraction as a Permitted Activity. This means it cannot be stopped, even if you live next door! Please rescind this – any area of mining should be put through due diligence – it is an irreversible change with many possible harms to the environment.”</li> </ul>
Rob Danford	General Approach General Rural Zone Policies General Rural Zone Rules	<ul style="list-style-type: none"> <li>Opposes direction of support for mineral extraction</li> <li>MIN-06 (pg 66) add... I to ensure that new mineral extraction activities do not compromise existing land use and amenity values by the effects such as dust, noise, vibration, traffic, litter, natural habitat fragmentation, etc. to the same standard of reverse sensitivity. Avoid (reverse) all reverse sensitivity effects from mining on existing use amenity values and quiet enjoyment.</li> <li>RURZ (pg 352)key point to add: The importance identified in the RURZ that new mining does not compromise existing residential activities through reverse sensitivity and recognition that residential activities are an expected and ongoing activity within all rural areas including GRZ. Because of previously allowed building of residences this will prohibit mining in some general rural zone areas. RURZ-P19. Add (c.) Mineral extraction not established near activities that are incompatible with mineral extraction. Any mineral extraction activities shall be a minimum of 250m away from any residence. RURZ-P25. Remove 'as far as practicable'.</li> <li>GRUZ (pg359). In this section overview there is a conspicuous lack of mentioning that some of us legally live and reside in the In the General Rural Zone and there has been allowed significant residential developments. This is where our legal homes are and reverse sensitivity should also apply to the numerous mining effects on our homes. Many of us living in the general rural zone on the West Coast need CERTAINTY that or quite enjoyment will not be destroyed by mining activities that are noisy, dirty, vibratory, increase litter, degrade water quality(ground and stream), destroy unique native forest, wetlands and wildlife habitat, fragment wildlife corridors and communities and creates community disharmony and unpleasantness for short term illusionary gain (greed). We do not need vague undefined platitudes like 'Support', 'as far as practicable', biased one way considered 'reverse sensitivity', and 'minimise'. We need to be considered to the same extent as mining and any other activities that effect our lives. Presently this plan is biased toward certain new activities and does not properly consider existing use and all peoples lives.</li> </ul>

Name/Organisation	Subtopic	Feedback
Aggregate and Quarry Assn	Overall Approach	<ul style="list-style-type: none"> <li>• Support the Strategic Objectives, MIN-01 to MIN-06 – Seek cross references to these from other parts of the plan -In particular Overlay chapters.</li> <li>• Concerned that permissive rules and the activity status of mineral extraction activities could be impacted when they occur within overlay areas – seek a clear consenting pathway with the ability to mitigate, offset and compensate.</li> <li>• A major concern with the plan relates to the impact of SNAs and ONLs in the transition period between the plan being notified and when it becomes fully operative. Specifically, the SNA, ONL and other overlay provisions will take effect when the plan is notified but the enabling provisions, both in the extractive zones and outside, will not become operative until decisions are made much later. This clearly causes problems for consent applications in that interim period.</li> <li>• The rules need to be operational at the outset to prevent the SNAs from being legally effective without the intended enabling rules.</li> <li>• Identify a number of places across the plan where are unhappy with the use of the word “avoid” in policy, Specific feedback on mineral extraction management plan and truck movements within the mineral extraction zone.</li> </ul>
Michael Orchard	General Approach	<ul style="list-style-type: none"> <li>• Support the identification of mineral extraction zones</li> </ul>
NZTA	General Rural Zone Rules Buller Coalfield Zone Rules Mineral Extraction Zone Rules	<ul style="list-style-type: none"> <li>• Amend GRUZ-R12 : The intent of the rule is supported. However, this rule could provide for a permitted pathway for mineral extraction on rural sites where 10 heavy vehicles and 30 light vehicle movements can be generated without consideration to road safety if using an existing access. The current Waka Kotahi standards could require a vehicle upgrade to a NZTA Diagram E for this level of activity, but the rule does not provide for that. Amend the rule to give consideration to traffic safety and vehicle crossing design</li> <li>• Amend BCZ – R4 Amend to “c. Managing traffic generation impacts on the safety, operation and maintenance of the transport network”</li> <li>• Amend BCZ – R5 Amend Matter of Control a. to “Management of access, parking and traffic generation effects from the site;”</li> <li>• Amend BCZ – R6 Amend Matter of Control a. to “Management of access, parking and traffic generation effects from the site;”</li> <li>• Support MIN – R6 and MIN – R7</li> </ul>
Buller District Council	General Approach	<ul style="list-style-type: none"> <li>• We note that the rules provided within the Exposure Draft are more enabling of mining activity already lawfully established. We are supportive of the general approach.</li> </ul>

Name/Organisation	Subtopic	Feedback
	Buller Coalfield Zone	<ul style="list-style-type: none"> <li>• However, we are concerned about effects on natural environment values from progressive mining activities, and how those currently captured under the resource consenting process will be protected under the proposed new rules in the absence of the RMA.</li> <li>• We therefore request greater clarification and thought around this permitted activity rule to ensure that the district's indigenous biodiversity remains protected under Section 6c of the RMA.</li> </ul>



# Te Tai o Poutini

## PLAN

*A combined district plan for the West Coast*

Prepared for: Te Tai o Poutini Plan Committee  
Prepared by: Lois Easton, Principal Planner  
Date: 29 April 2022  
Subject: **Te Tai o Poutini Plan – Additional Feedback on the Draft Plan**

---

### INTRODUCTION

1. An error in the summary of feedback prepared for 29 March 2022 has been identified, with two pieces of feedback merged into one. This affects the feedback from Ravensdown and Martin and Co.
2. The correct summary and recommended responses are included in the table below.

Reference	Name/ Organisation	Topic	Summary	Recommended Response
DF190	Ravensdown	General Rural Zone - fertiliser application	Detailed feedback on Rural Zone and Noise provisions as relate to aerial application of fertiliser.	Review and amend provisions where appropriate - look at alongside feedback from agricultural aircraft association, Noise addressed in detailed report in April
DF237	Martin and Co Westport	Commercial Zone Rules, Westport Flood Hazards, Westport Zoning	Detailed feedback on Commercial Zone Rules. Should have Westport specific provisions for flooding - maps should be based on when flood protection is in place. Seek 2% AEP event freeboard requirements.	Incorporate feedback on Commercial Zone Rules. Westport flood hazards are subject to a detailed report in May,

### RECOMMENDATIONS

1. That the Committee receive the report.
2. That the correct summary and recommended responses be considered alongside the other feedback on the draft TTPP Plan.



# Te Tai o Poutini PLAN

*A combined district plan for the West Coast*

Prepared for: Te Tai o Poutini Plan Committee  
Prepared by: Lois Easton, Principal Planner  
Date: 29 April 2022  
Subject: **Te Tai o Poutini Plan – Zoning of Public Conservation Land**

---

## **SUMMARY**

This report brings back the draft Plan feedback on the issue of Zoning of Public Conservation Land.

The report considers:

- What is an appropriate zone for different types of Public Conservation Land (PCL)
- Amendments to the Open Space and Recreation Zone provisions to support the zoning of PCL

## **RECOMMENDATIONS**

1. That the Committee receive the report.
2. That the following zoning changes to PCL be made:
  - a. National Parks be included within the Natural Open Space Zone
  - b. Land identified through the Stewardship Land review for potential divestment be zoned as General Rural Zone;
  - c. Remaining PCL land that was zoned General Rural in the draft Plan be rezoned as Open Space Zone.

Lois Easton  
**Principal Planner**

## INTRODUCTION

1. The exposure draft Te Tai o Poutini Plan was made available to the public on 26 January 2022. A series of consultation meetings and drop in sessions were undertaken over late February. Feedback on the draft was able to be provided until 11 March and an overview of this and proposed responses was considered at the 29 March meeting of the Committee for discussion and decision around amendments to the draft Plan.
2. Five people and organisations provided feedback on the draft zoning of the Public Conservation Land (PCL) and the Open Space and Recreation Zone provisions. Because this is a matter which has had only a small amount of consideration by the Committee during the development of the draft Plan, this report brings the feedback back and seeks direction from the Committee on these matters.

## KEY CONTEXT

3. Communities are often passionate about the uses of the local Open Space and the activities that occur on them. Open Space can be used for passive activities such as walking with few environmental effects, through to large scale sports and community events with noise, parking, lighting and traffic generation impacts, therefore there are three Open Space Zones available for use in TTPP. The proposed uses of these zones is outlined below, as presented to the Committee when this issue was discussed in November 2020

**Natural open space zone:** Areas where the natural environment is retained and activities, buildings and other structures are compatible with the characteristics of the zone.

- The purpose of the Natural Open Space zone is to recognise and provide for open spaces that contain high natural, ecological and landscape values. The zone applies to a variety of parks and reserves, coastal and riverside esplanade reserves, scenic reserves, local purpose reserves and recreation reserves.
- This zone also applies to large areas of public conservation land - national parks, scientific reserves, wilderness areas, specially protected areas and important ecological areas. Natural Open Space has a high degree of biodiversity requiring recognition, maintenance and/or enhancement. These are spaces that the community value and areas where people can relax and enjoy recreation and leisure activities such as walking and cycling, fishing, picnicking, and boating. Some of these spaces are used for cultural and customary activities, such as gathering mahinga kai, and are rich in historic heritage and cultural heritage values.
- A low level of development and built form is anticipated within this zone to retain the natural/biodiversity values within natural open space areas. Activities and uses on publicly owned land are required to obtain permission (such as a lease or a licence) from the relevant administering authority. This is in addition to any requirements under Te Tai o Poutini Plan and the RMA. All activities will also have regard to any relevant reserve management plans, national park management plans or national legislation (Reserves Act or Conservation Act).

**Open space zone:** Areas used predominantly for a range of passive and active recreational activities all with limited associated facilities and structures.

- The purpose of the Open Space Zone is to provide open spaces that are used predominantly for a range of passive and active leisure and recreational activities, along with limited associated facilities and structures.
- The District's open spaces vary in size from small neighbourhood parks to large sized parks where people can enjoy activities such as walking and cycling, skateboarding, swimming, surfing, camping and kicking a ball around. Some of these open spaces are located near waterbodies and the coast, others are in urban neighbourhoods and others form an important part of the district's shared pathway network. It includes civic spaces, land with community facilities, cemeteries, campgrounds and nohoanga sites. Historic reserves and large areas of public conservation land fall within this zone. Grazing is sometimes undertaken within these areas for land management purposes. These public open spaces are generally more open, with less built features and contribute to an

attractive living environment for people on the West Coast. They can also have important natural and historic heritage values.

- Activities and uses on publicly owned land are required to obtain permission (such as a lease or a licence) from the relevant administering authority. This is in addition to any requirements under Te Tai o Poutini Plan and the RMA. All activities will also have regard to any relevant reserve management plans and legislation (Reserves Act 1977 or Conservation Act 1990).

**Sport and active recreation zone:** Areas used predominantly for a range of indoor and outdoor sport and active recreational activities and associated facilities and structures

- The purpose of the Sport and Active Recreation Zone is to provide open space areas for a range of sport and recreation activities, including organised sport and recreation for local, district-wide and regional communities.
- This zone applies in parks, sports grounds and multi-sport facilities. Such areas will normally have associated buildings such as club rooms, changing sheds or toilet facilities. These spaces are areas where people can also enjoy informal exercise and leisure activities. Sport and active recreation areas are predominantly characterised by large open space areas with associated buildings and facilities that vary in scale depending on the sport and recreation activities that take place there. It is generally accepted that the level of development in this zone is higher than other Open Space and Recreation zones and that the sport and recreation activities that are anticipated to take place in this zone can generate noise, light and traffic effects in surrounding neighbourhoods.
- Activities and uses on publicly owned land are required to obtain permission (such as a lease or a licence) from the Council as the administering authority. This is in addition to any requirements under Te Tai o Poutini Plan and the RMA. All activities will also have regard to any relevant reserve management plan and legislation (Reserves Act 1977).

#### **DRAFT TTPP ZONING FOR PCL**

4. Prior to undertaking zoning of the PCL, staff consulted with Department of Conservation (DOC) staff. They were unclear about which open space and recreation zone was appropriate for which type of location, principally because they were concerned about the impacts on concessionaires. This included concerns about the use of a Natural Open Space Zone on National Parks. A request was made to DOC for clear spatial identification of their zoning preferences, but this was not provided.
5. Following that discussion, the announcement of the Stewardship Land Review was made and the Committee expressed concern that the zoning of PCL should not be a barrier to the outcomes of the review, if land was to be removed from the conservation estate.
6. When it came to undertaking the zoning, TTPP staff had very little information other than the LINZ title data, regarding the status of different pieces of PCL. As a result, and due to the tight timeframe, the principles originally intended were not able to be adhered to. Instead, the PCL is zoned a combination of Natural Open Space Zone (very few areas which from the data held by TTPP staff clearly indicated the high ecological value), Open Space (most of the PCL) and General Rural Zone (most of the Stewardship Land).
7. This draft zoning was seen as an interim approach, pending clear feedback from DOC.
8. Alongside the use of the Open Space and Recreation Zones and General Rural Zone, some areas of PCL were zoned Mineral Extraction Zone, Buller Coalfield Zone, Māori Purpose Zone (by Arahura Marae) and Future Urban Zone (Franz Josef).

#### **FEEDBACK ON THE DRAFT TTPP**

9. Five individuals and stakeholders provided feedback on the appropriate zoning for the PLC, including Department of Conservation. This feedback is outlined in Appendix One. Summary:
  - The Department of Conservation, Kathy Gilbert and Lynley Hargreaves seek that all of the PCL be zoned Natural Open Space.
  - Brian Anderson and Teresa Wyndham-Smith seek that a more consistent approach to zoning be undertaken.



10. Alongside this there was also specific feedback about the zoning of PCL at Franz Josef, however this will be discussed in May as part of a wider report on Franz Josef zoning.

## DISCUSSION

11. The zoning of PCL mainly affects people and organisations that hold concessions over the PCL as DOC is largely exempt from meeting the requirements of TTPP with land being managed in accordance with the Conservation Act.
12. The key differences between the zones currently used for most of the PCL are outlined in the table below. The main things to note are that:
- The Open Space Zone provides for a wider range of activities such as campgrounds, local community facilities and cemeteries. Because of the paucity of Council-owned land, in parts of the coast such as South Westland and Punakaiki these types of activities are often located on PCL. In addition some types of reserves are held under the Reserves Act specifically for local purposes such as community facilities.
  - The Open Space Zone also provides for mineral extraction – recognising the presence of both Quarry Reserves as well as activities such as gravel abstraction from rivers within PCL (e.g. Punakaiki River to provide for local uses) as well as larger scale mineral extraction activity.
  - The Natural Open Space Zone has very restrictive rules, reflecting the high ecological values expected to be present in these locations. It does not anticipate community activities or mineral extraction will be undertaken in these areas.
  - The General Rural Zone rules were not drafted with consideration for open space use. Activities such as community facilities, campgrounds and cemeteries are not generally expected in the zone. There are however more enabling provisions for primary production and Mineral Extraction.

	<b>Natural Open Space Zone</b>	<b>Open Space Zone</b>	<b>General Rural Zone</b>
Community Facilities	Restricted Discretionary	Permitted Activity	Non-complying Activity
Campgrounds	Temporary Campgrounds max 10 days/year only Permitted	Permitted Activity	Discretionary Activity
Park Facilities	Permitted Activity	Permitted Activity	Not specifically provided for – depending on type could require resource consent
Recreation Activities	Permitted Activity	Permitted Activity	Permitted Activity
Commercial Activities	Retail permitted where ancillary	Retail permitted where ancillary	Restricted Discretionary
Residential Activities	Discretionary where ancillary	Permitted where ancillary	Permitted Activity
Cemeteries and urupa	Discretionary	Permitted where already established	Non-complying Activity
Mineral Extraction	Non-complying	Restricted Discretionary	Permitted small scale, many Restricted Discretionary (due to vegetation clearance provisions)

13. The feedback provided highlights that the PCL should be zoned reflecting the purposes for which the land is held. Generally this is considered to mean that one of the Open Space and Recreation Zones, rather than a General Rural Zone is most appropriate for the use of the land.

#### *Community Use of PCL*

14. While DOC has sought that PCL be zoned Natural Open Space, it is noted that activities such as the Okarito community campground are located on PCL. If this land was included in a Natural Open Space Zone then any changes to the activity would require a substantial resource consent. There are a range of other community activities that are located on PCL that could be similarly affected.
15. There is insufficient information held by the councils to be able to clearly identify all the areas of PCL that are used for community, or other concessionaire use – DOC is the agency that holds this information but has not been able to provide it to the TTPP team.

#### *Infrastructure and Quarrying Activities on PCL*

16. Because of the land tenure mix on the West Coast, there are numerous locations e.g. in South Westland and the Paparoa Range where infrastructure such as roads and electricity lines need to be located on PCL. This is also the case in some situations where PCL is the only location where suitable quarry rock for protection works, or gravel for roading metal can be sourced. These activities are better provided for in the Open Space Zone than the Natural Open Space Zone.
17. As for other concessions and community activities on PCL, the locational information of these sites is held by DOC and has not been provided to the TTPP team.

#### *Stewardship Land Review*

18. The Stewardship Land Review is well underway. The first tranche is expected to be released for consultation within the next month. The proposals for public consultation will give a strong indication of the land that is likely to be released from the PCL and is not appropriate to be zoned with an Open Space Zone.

#### **RECOMMENDED CHANGES TO THE DRAFT TTPP**

19. Given the feedback and the discussion above it is recommended that the best approach for zoning of the PCL is still a mix of zones, but that this can be better refined than in the draft plan. It is recommended that:
  - Alongside the wilderness and ecological areas already included, that National Parks be added to the Natural Open Space Zone;
  - Land identified through the Stewardship Land review for potential divestment be zoned as General Rural Zone;
  - Remaining PCL land be zoned as Open Space Zone.
20. That DOC be advised of the proposed approach and reasons why, to help inform their submissions on the proposed Plan and in particular the provision of locational information on concessions, infrastructure and community facilities that will help with appropriate zoning decisions.

**Appendix One: Summary of Feedback Received on Open Space and Recreation Zones and Zoning of PCL**

Name/Organisation	Feedback
Kathy Gilbert	Public Conservation Land should be zoned natural open space , no mining should be allowed in any open space zone
Lynley Hargreaves	The National Planning Standards suggests that areas where the natural environment is retained should be mapped as Natural Open Space. Reasoning within the draft plan also suggests areas of high natural values should be mapped as Natural Open Space. Despite this, the exposure draft plan has mapped most such areas as Open Space, with some also mapped as other zones such as rural or mineral extraction.. If Natural Open Space and Open Space zones are to be used in the plan, then they should use Natural Open Space for areas where the natural environment is retained. This would mean that virtually all conservation land and some other areas where the natural environment is retained should be mapped as Natural Open Space.
Brian Anderson	Open Space, and Natural Open Space zones The mapping of the Open Space, and Natural Open Space zones lacks coherence, and seems to be based on a misunderstanding of the role of Public Conservation Land. The rationale behind the mapping of these zones is not explained, but it deviates from the explanation of the NOSZ and OSZ as laid out in the TTPP – the purpose of the conservation estate is conservation and this should be the zoning. Mineral extraction should not be provided for in the OSRZ.
DOC	The preferred land use zoning for all public conservation land is natural open space zone, as this is the best fit for the purpose the land is managed for and in the majority fits with existing and future land use in these areas
Teresa Wyndham-Smith	Zoning appears inconsistent. There are no objectives and policies for the open space zones so where a consent is required there aren't provisions to determine whether an activity would maintain the values and characteristics of the zone. Relying solely on consenting processes leaves unidentified significant biodiversity at risk. This will result in ad-hoc, and in many cases only partial identification, of significant areas. It is not clear how the rules which are intended to restrict activities in such areas can be effectively applied with this approach. It is particularly concerning how this would apply where mineral extraction zones have been identified over public conservation land or other areas with significant natural values. "



# Te Tai o Poutini PLAN

*A combined district plan for the West Coast*

Prepared for: Te Tai o Poutini Plan Committee

Prepared by: Lois Easton, Principal Planner

Date: 29 April 2022

Subject: **Te Tai o Poutini Plan – Outstanding Natural Landscapes and Coastal Natural Character Mapping**

---

## **SUMMARY**

This report brings to the Committee the report that reviews the boundaries and identification of areas of Outstanding Natural Landscapes and Coastal Natural Character.

Brown Ltd was contracted to undertake a field study to review the 2013 boundaries of a range of identified areas of outstanding natural landscapes and coastal natural character areas. The report from Brown Ltd is included as an appendix.

## **RECOMMENDATIONS**

1. That the Committee receive the report.
2. That the mapping of the Outstanding Natural Landscapes and Coastal Natural Character in the TTPP be amended in accordance with the recommendations of Brown Ltd.

Lois Easton

**Principal Planner**

## INTRODUCTION

1. In 2013 the four West Coast Councils contracted Brown Ltd to undertake a landscape and natural character mapping study of the West Coast. This provided the basis for identification of areas of Outstanding Coastal Natural Character and Outstanding Natural Landscape in the 2016 proposed West Coast Regional Coastal Plan.
2. As part of the preparation of the draft TTPP the work was digitised onto the TTPP GIS, with the following areas included:
  - a. Outstanding Natural Landscapes identified across the West Coast
  - b. An inland boundary for the Coastal Environment
  - c. Outstanding Natural Character within the Coastal Environment (Outstanding Coastal Natural Character)
  - d. High Natural Character within the Coastal Environment (High Coastal Natural Character).
3. Following the digitisation process the maps were reviewed by the technical staff and a number of areas were queried as to whether they still met the definitions of Outstanding Natural Landscape/Outstanding and High Natural Character.
4. Brown Ltd were commissioned to review the boundaries and inclusion of the identified areas.
5. The work was intended to be undertaken in time to inform the draft TTPP, but this was unable to occur due to the three month lockdown in Auckland.
6. Brown Ltd instead undertook the field assessment over January 2022 and has now prepared a report and revised maps.
7. The report is attached at Appendix One. Work is currently underway amending the GIS maps for the proposed TTPP.

## REPORT FINDINGS AND BOUNDARY AMENDMENTS

8. The field assessment and review undertaken by Brown Ltd both looked at the boundaries of the areas, and whether they still met the criteria for their classification. There were two main findings of the review.
9. The field survey confirmed that areas that did not meet the criteria were included in the mapping – generally this was because the quality of the 2013 aerial photography, and subsequent digitisation process resulted in errors of mapping – with the boundaries of mapped areas often extending wider than was appropriate. For all of the sites investigated, Brown Ltd has recommended mapping amendments. These are detailed in the report. The implications of this are that, with the recommended mapping amendments, fewer private properties, particularly in coastal areas, are affected by the identification of Outstanding Natural Landscapes and Outstanding or High Coastal Natural Character.
10. Notable mapping changes have occurred at the following locations:

### *Outstanding Natural Landscape*

- Removing the ridge at Ngakawau from ONL51 and pulling the boundary back from the coastal community
- Redefining the boundaries of ONL 50 (Stockton/Denniston) so that mining and ancillary areas as well as the valley floor near Waimangaroa are excluded
- Refining the boundaries around the New Creek and Inangahua areas to exclude modified land
- Updating the ONL 44 boundary along the coastal Paparoas to exclude more recent development such as at Kaipatiki Road
- Excluding the mining areas (past and present) between Blackball and Rewanui from ONLs 41 and 42 as well as refining the boundary margins west to north-east of Blackball
- Excluding farmland at ONLs 39 and 40 as well as production forestry in the Big River/Otututu River and Berlins areas
- Excluding the Giles Creek Coal Mine from ONL38, Garvey's Creek and Globe Progress Mines from ONL33
- Refined boundaries around Kangaroo Lake and Lake Haupiri to reflect land use change since 2013

- Refined boundaries for ONL29 (Lake Brunner) and ONL 28 (Taramakau River) to follow the ranges and exclude farmed areas
- Refined boundaries for ONL 25 (Lake Kaniere) to avoid areas of production forestry, farmland and modified areas
- Excluding farmed areas from ONL22 (Kokatahi)
- Substantial reduction in size of ONL 21 (Kakapotahi) to exclude areas not meeting the criteria
- Refined mapping of ONL15 and ONL17 (Whataroa) to exclude farmed areas
- Refined mapping of ONL 11 (Mahitahi and Jackson Bay) to exclude modified areas and those not meeting criteria

#### *Coastal Natural Character*

- More accurate mapping of coastal natural character at Oparara River (HNC58) and Karamea River Mouth (HNC57)
  - Amendments at Granity/Hector/Ngakawau and Waimangaroa (HNC54) to coastal natural character mapping pulling this back off private property boundaries and aligning with the main range
  - Realignment of mapping at Orowaiti (HNC52) so that only the lagoon is covered by the identification
  - Updating and refinement of ONC41, ONC42 and HNC43 to reflect the changes and development that has occurred in the Punakaiki- Fox River areas
  - Refining the boundaries of HNC35 (Gladstone to Camerons), HNC33 (Chesterfield Terraces) to avoid more recent development
  - Reassessing ONC9 and HNC10 around Hannah's Clearing and the Waiototo River and excluding the settlement and farmland from the areas
11. Furthermore the reassessment has resulted in one ONL and one HNC being recommended for removal, and the downgrading of an ONC to HNC as a result of changes that have occurred in the landscape over the last nine years. These are:
- Removing ONL30 (Kaiata Range and Peter Range) completely – these areas (the backdrop to Greymouth) have been further modified since 2013 and no longer meet the definition of outstanding
  - Reassessing ONC40 at Barrytown Flats as HNC and redefining the boundaries to exclude recent development
  - Reassessing and removing HNC36 (Greymouth and Peter Ridge) as they no longer meet the criteria

#### **NEXT STEPS**

12. Updating of the GIS mapping of the areas is currently underway and it is recommended that the updated maps be used in the proposed TTPP.



# WEST COAST LANDSCAPE STUDY REVIEW OF OUTSTANDING NATURAL LANDSCAPES & AREA OF HIGH & OUTSTANDING NATURAL CHARACTER

**Brown NZ Ltd**  
March 2022

# 1. Introduction

---

This report comprises a review of Outstanding Natural Landscapes (ONLs) and Areas of High or Outstanding Natural Character (HNC / ONC Areas) that were identified in 2012 and 2013 for the West Coast Regional Council, Buller District Council, Grey District Council and Westland District Council. In accordance with the brief supplied by Lois Easton, as the Principal Planner for the Te Tai o Poutini Plan, this re-evaluation has addressed the following ONLs and HNC / ONC Areas:

## Outstanding Natural Landscapes

- ONL 54 Karamea Bluffs & the Fenian, Stormy & Radiant Ranges
- ONLs 50 & 51 Ngakawau & Granity
- ONLs 49, 50 & 51 Denniston & Stockton Plateaux
- ONLs 48 & 49 New Creek
- ONLs 48 & 49 Brunner & Lyell Ranges
- ONLs 44 & 46 Paparoa Range West Coastline
- ONL 41 Paparoa East & Mt William Range
- ONLs 41 & 42 Paparoa Range East & Mt William Range - Blackball
- ONLs 39, 40 & 41 Paparoa Range East – Big River & Otututu River
- ONLs 39 & 41 Paparoa Range East – Berlins to Larrys Creek
- ONL 38 Reefton Saddle
- ONL 33 Island Block
- ONL 32 Kangaroo Lake
- ONL 30 Kaiata Range & Peter Range
- ONL 29 Lake Brunner
- ONLs 27 & 28 Taramakau River
- ONL 25 Lake Kaniere & Arahura River
- ONL 22 Kokatahi
- ONL 20 Kakapotahi / Duffers Creek
- ONLs 15 & 17 Whataroa
- ONL 11 Mahitahi / Makaawhio
- ONL 3 Jackson Bay

## High & Outstanding Natural Character Areas

- HNC Area C58 Oparara River
- HNC Area C57 Karamea River Mouth
- HNC Area C54 Granity, Hector & Ngakawau



- HNC Area C52 Orowaiti Lagoon
- ONC Areas 42 & 44 and HNC Areas 41 & 43 Fox River to Punakaiki
- ONC Area C40 Barrytown Flats
- HNC Area C36 Peter Ridge
- HNC Area C35 Karoro-South Beach to Camerons
- HNC Area C33 Chesterfield Terraces
- ONC Area C9 & HNC Area C10 Hannahs Clearing
- ONC Area C9 Waiaototo Lagoon and Wetland

### **Reassessment of Individual ONLs and HNC / ONC Areas**

This review has been undertaken in accordance with the criteria for ONLs and HNC / ONC Areas set out in the *West Coast Landscape & Natural Character Study 2012 & 2013 – Explanation of Assessment Methodologies*, dated March 2021.

That report addressed 'best practice' in relation to such identification, together with relevant case law on the subject. Accordingly, The assessment criteria and ratings scale employed in the identification of ONLs, together with Areas of High and Outstanding Natural Character values were as set out in the following sample assessment tables extracted from the 2012/13 study (overleaf):

## OUTSTANDING NATURAL LANDSCAPES ASSESSMENT:

Jackson Head & Stafford Ranges

Unit No: 3B (forms the terrestrial area of ONL 3)

Bio Physical Landscape Characteristics	
Evaluation Factors:	Key Values: (Indication of key Bio-Physical values)
Landforms (Geomorphology / Geology / Terrain)	<input type="checkbox"/>
Vegetation Type (s)	<input type="checkbox"/>
Sea / Water Bodies	<input type="checkbox"/>
Natural Processes	<input type="checkbox"/>
Land Uses / Activities / Structure	<input type="checkbox"/>
<b>Rating of Bio Physical Values:</b>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/>
	Low .....High

Perceptual / Aesthetic Values	
Evaluation Factors:	Key Values: (Indication of key Perceptual values)
2D Patterns (Composition) & 3D Spatial Structure	<input type="checkbox"/>
Vividness / Expressiveness / Legibility	<input type="checkbox"/>
Dynamic / Transient Values	<input type="checkbox"/>
Landmarks / Key Views	<input type="checkbox"/>
Coherence / Unity	<input type="checkbox"/>
<b>Rating of Perceptual / Aesthetics Values:</b>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/>
	Low .....High

Associative Values	
Evaluation Factors:	Key Values: (Indication of key Perceptual values)
Naturalness / Endemic Value (distinctive NZ / West Coast Sense of Place)	<input type="checkbox"/>
Tangata Whenua Values / Associations	<input type="checkbox"/>
Historical / Heritage Associations	<input type="checkbox"/>
<b>Rating of Perceptual / Aesthetics Values:</b>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/>
	Low .....High

ONFL THRESHOLDS: (Overall Evaluation of Landscape Values in the context of the West Coast Region)

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>OUTSTANDING</b>				

## HIGH & OUTSTANDING NATURAL CHARACTER VALUES ASSESSMENT:

Okarito River - Lake Mapourika & Wahapo

Unit No: T52

Bio Physical Characteristics	
Evaluation Factors:	Key Values: (Indication of key Bio-Physical values)
Landforms (Geomorphology / Geology)	
Vegetation Type, Cover & Patterns	
Sea / Estuarine / Water Bodies	
Land Uses / Activities / Structure	
Habitat Value	
Natural Processes	
<b>Rating of Bio Physical Values:</b>	

Low .....High

Perceptual Values	
Evaluation Factors:	Key Values: (Indication of key Perceptual values)
Wildness / Wilderness / Remoteness	
Experiential Attributes	
Context / Setting	
Transient / Dynamic Attributes	
Night-time Values	
<b>Rating of Perceptual Values:</b>	

Low .....High

Overall Natural Character Evaluation  
(Biophysical and Perceptual Values)

<b>OUTSTANDING</b>

## The Coastal Environment

Directly related to the identification of areas that display high or outstanding natural character values is the delineation of the Coastal Environment. In 2012/13, the extent of the Coastal Environment was delineated employing the following factors – in accordance with Policy 1 of the NZ Coastal Policy Statement:

### **A. Areas That Are Physically Linked to the CMA:**

1. *that are directly subject to wave action and tidal inundation / movement and which contain / define the inter-tidal margins of the CMA;*
2. *coastal drainage systems, including catchments and headwaters that feed directly into the CMA; and*
3. *landforms and vegetation cover that are directly affected / modified by exposure and proximity to the CMA – through wind action, wave action and salt exposure.*

### **B. Areas Whose Character is Substantially Defined by their Proximity to the CMA:**

4. *areas within which the CMA is a dominant to significant visual entity;*
5. *locations whose landscape character and amenity is clearly influenced by proximity to, and a sense of connection with, the CMA; and*
6. *locations within which items of cultural and historic heritage are found that are linked to, or within the CMA.*

The following examples were then provided of the application of these criteria to different types of coastal environment:

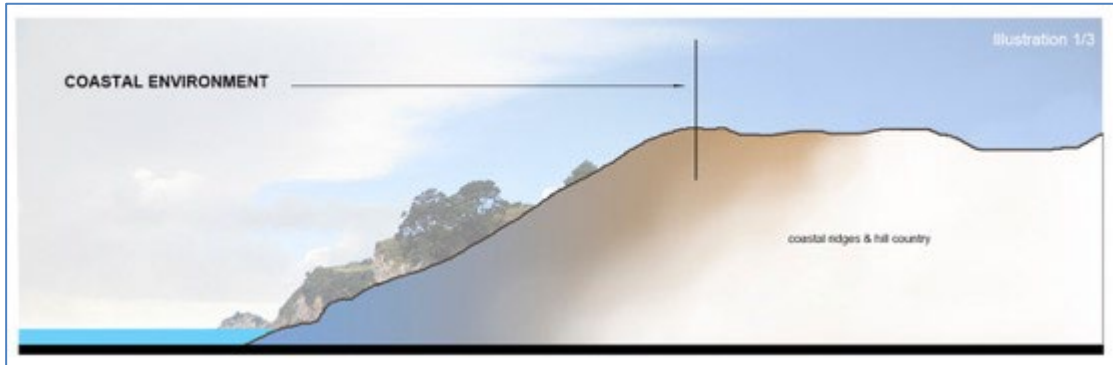
Many parts of the coast enjoy direct visual interaction with the CMA, and some – such as beachfronts, spits, dune corridors and wetland margins – are clearly shaped by their exposure to the sea. In some locations, this area of coastal influence can extend for kilometres inland, particularly around major coastal dune systems and wetlands, such as those found around the Okarito Lagoon, Waitaha and Okuru. In such cases, the Coastal Environment was extended inland sufficiently far to capture such areas – as shown on **Figure 1** (below).

**Figure 1.**



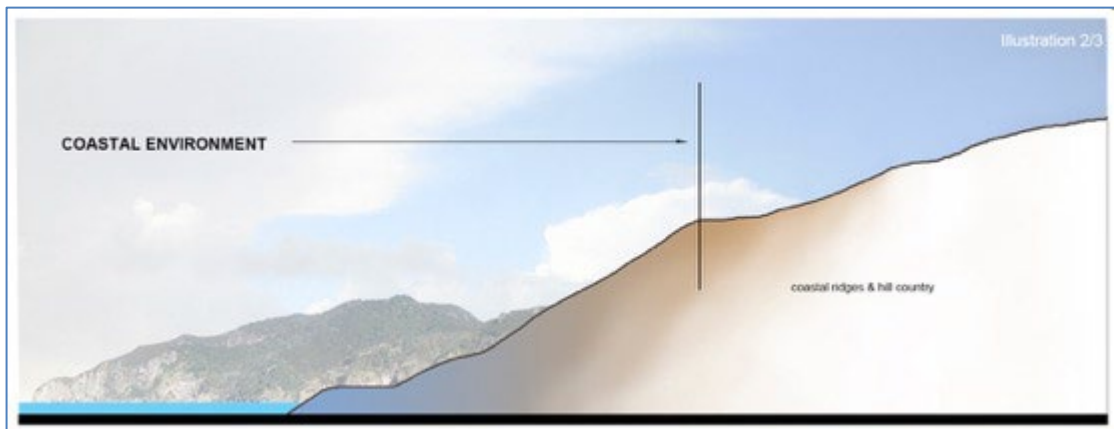
Conversely, the West Coast is also renowned for its major coastal ranges, some of which fall directly into the Tasman Sea. This includes those found around Jackson Bay, Whakapohai-Paringa, Punakaiki, and north of Mokihinui, all have a clear connection with the Coastal Marine Environment (CMA) and their coastal slopes / faces logically fall within the Coastal Environment (see **Figure 2**).

**Figure 2.**



However, in many areas this interaction is less easily defined. The main ranges that provide the backdrop to all of the West Coast often enjoy spectacular views to, and of, the Tasman Sea (eg. from the Denniston Plateau), but frequently do so over a considerable distance. Conceivably, this could have resulted in exceptionally large parts of the Region being captured by the Coastal Environment. However, in such instances, an attempt was made to identify those areas that derive most, or a very large proportion, of their character from visual interaction with the CMA and which convey a marked sense of being shaped (especially in terms of their vegetation cover) by the physical processes derived from close proximity to the sea. These areas were differentiated from others that also offer views to and from the sea, but in which such interaction was considered less fundamental to their visual and physical character. As a result, the Coastal Environment often runs much closer to the coast than the major ranges behind it, ‘hopping’ over river valleys and from ridge to ridge quite close to the CMA – as illustrated in **Figure 3**.

**Figure 3.**



This review does not explicitly review the extent of the West Coast’s Coastal Environment as a discrete matter, but it is addressed in relation to a number of HNC / ONC Areas that are reviewed in this report. As such, it is important that the basis for the delineation of both the Coastal Environment and areas of high or outstanding natural character within it is appreciated.

### **Presentation of This Review’s Findings**

The review of each ONL and HNC / ONC Area in this review comprises:

- A brief outline of the relevant issues for that ONL / Area, as outlined in the brief;
- A map of the relevant area extracted from the 2012/13 landscape assessment;

- Photos of the individual ONL(s) and HNC / ONC Area(s) – although poor weather greatly hampered photography in Westland and (on one day) near Hokitika, while the access Road to the Denniston Plateau was also closed during my site visit;
- A brief commentary on recommendations designed to address the issues identified; and
- Aerial imagery (Google Maps) showing revised boundaries and any other recommendations.

In relation to the images / mapping now shown in this review, it should be noted that in 2012/13, such base imagery was not available: the Google Earth images that could be accessed at that time were quite simply too crude and indistinct (in many areas) to rely on. As a result, the majority of mapping undertaken at that time relied on NZMS 260 Mapping (at a 1:50,000 scale) and use of public roads to view as much of the West Coast as possible. Even so, large areas were difficult to access and evaluate. Nearly 10 years on, the latest generation of aerial imagery is much precise: it provides a level of accuracy that is well beyond that previously available and much more certainty in relation to many ONL and HNC / ONC Area boundaries.

In addition, the images presented respond to changes in land use that have occurred up and down the West Coast since 2013, and I have taken the opportunity to re-assess the values of some ONLs and HNC/ONC Areas – which has also resulted in changes to some mapping. While the changes to some ONL and HNC/ONC maps are therefore quite limited, they are much more significant for others and, where possible, such changes have been extended to areas not identified in the brief as being of concern. Even so, it is clear that many areas not identified as areas of concern in the brief might well benefit from re-examination through the lens of the more accurate aerial imagery now available.

Finally, the order in which the ONLs and HNC/ONC Areas are addressed in this report is from north to south – starting near Karamea and ending near Jacksons Bay. This contrasts with the numbering of the ONLs and HNC/ONC Areas in the 2012/13, which worked from left to right, but also from south to north (Jackson Bay to Karamea).

## 2. ONL Review

---

The following are brief summarises of the review findings for each ONL set out in Section 1, together with a brief precis of the rationale for those findings and associated maps, aerials and (where available) photos.

## ONLs 53 & 54 Karamea Bluffs & Fenian, Stormy & Radiant Ranges

The key issue raised in relation to this area was the presence of private properties within ONL 54 near Karamea and Little Wanganui. The boundaries for this ONL were originally defined by the area of native bush on rolling foothills at the edge of the Karamea Plain and River (see below).



The Little Wanganui River & ONL54 beyond it





Looking from Wangapeka Rd towards Captains Creek & ONFL54

Having reviewed the situation on the ground, it remains the case (as in 2012/13) that ONL54 (together with part of ONL53) are best differentiated from non-ONL areas by their:

- increasingly elevated topography;
- more mature and significant bush;
- the cohesion of that bush cover;
- high levels of expressiveness (related to 'formative' values) and legibility;
- high levels of visual coherence and unity;
- high levels of perceived naturalness and endemic value; and
- high levels of aesthetic appeal.

Local property boundaries may coincide with some of these 'edges' or interfaces, but are not meaningful or determinative in their own right from a landscape standpoint. The following aerial images (below & overleaf) show a recommended / revised ONL boundary based on where these characteristics become apparent – near central Karamea, then Little Wanganui.



## ONLs 50 & 51 Ngakawau & Granity

The key issues raised in relation to this area were the overlap of ONL 51 with some private properties and its extension across the ridge at the rear of Ngakawau – between that coastal settlement and the Stockton Mine / Millerton.



Entering Granity from the south with ONFL51 behind it



Ngakawau and its coal transfer station & cableway



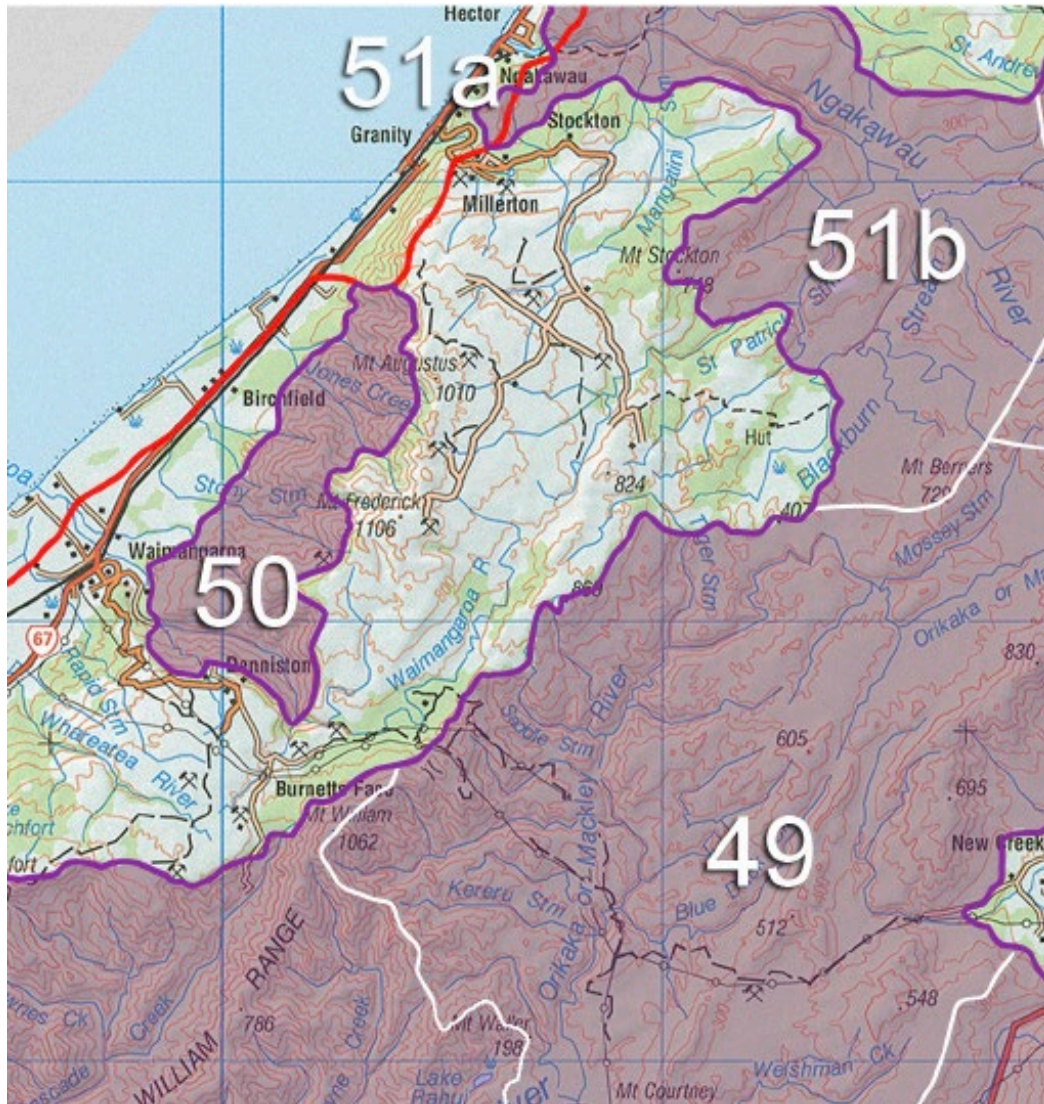
Entering Hector from the north with ONFL51 behind it

After reviewing the extent of ONL51, I agree that the ridge behind Ngakawau should be removed from that ONL. However, it remains my opinion that the coastal ridges either side of Ngakawau and Granity are important components of both the local, and wider, coastal landscapes that are linked to the hill country at the core of ONLs 50 and 51. Accordingly, it is my assessment that the main slopes of those ridges should be retained within both ONLs (as shown below), but that they should be pulled back from the coastal margins that form part of both towns and the open spaces associated with both settlements.



## ONLs 49, 50 & 51 Denniston & Stockton Plateaux

Concern was raised in relation to the potential overlap of ONLs 49, 50 and 51 with mining operations associated with the Escarpment, Cascade and Stockton Mines. Concern was also raised about the inclusion of the Waimangaroa Stream valley in ONL 50.



Looking from SH67 towards the valley around the Banbury Stream & the Denniston Plateau beyond

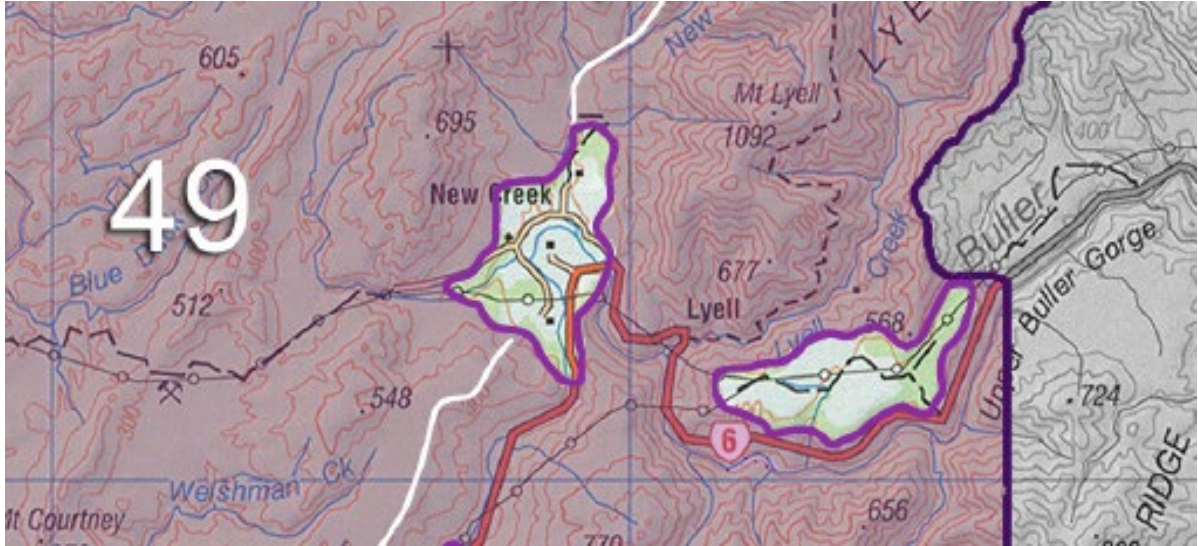
During the Environment Court proceedings over the Escarpment Mine in 2011/12, it was clarified that the boundaries of the then operational Stockton and Cascades (Denniston) Mine lay outside ONLs 49 and 51, and that the then proposed Escarpment Mine (Denniston) would also avoid ONLs 49 and 50. The aerial shown below refines the boundaries of all three ONLs, based on the distribution of more elevated and expressive, terrain, more continuous forest / bush cover and the avoidance of areas of mining operations.

In relation to the Waimangaroa Stream valley, I consider that it remains a clearly legible component of the wider sequence of coastal hills overlooking the Tasman Sea plain and that its forest cover contributes to the appeal and natural heritage values of ONL50. As such, it is my opinion that it should be retained within that ONL. Its margins have, however, been redefined in the aerial (below) to avoid the access road to Denniston, together with areas of private activity with the valley floor near the settlement of Waimangaroa.



## ONLs 48 & 49 New Creek

The key issue raised in relation to this area was the presence of private properties within parts of ONLs 48 and 49.



Looking down Pensini Rd towards the hill country & forest of the eastern half of ONFL49



Looking from New Creek Rd across the Buller River towards ONFL49 to the south

As in 2012/13, the margins of both ONLs are defined by the transition away from farmland on the flats and rolling terrain either side of the Buller River into both ONLs that are differentiated by their:

- increasingly elevated, hill country surrounds;
- tracts of mature bush;

- the cohesion of that forest / bush cover;
- high levels of expressiveness (related to 'formative' values) and legibility;
- high levels of visual coherence and unity;
- high levels of perceived naturalness and endemic value; and
- high levels of aesthetic appeal.

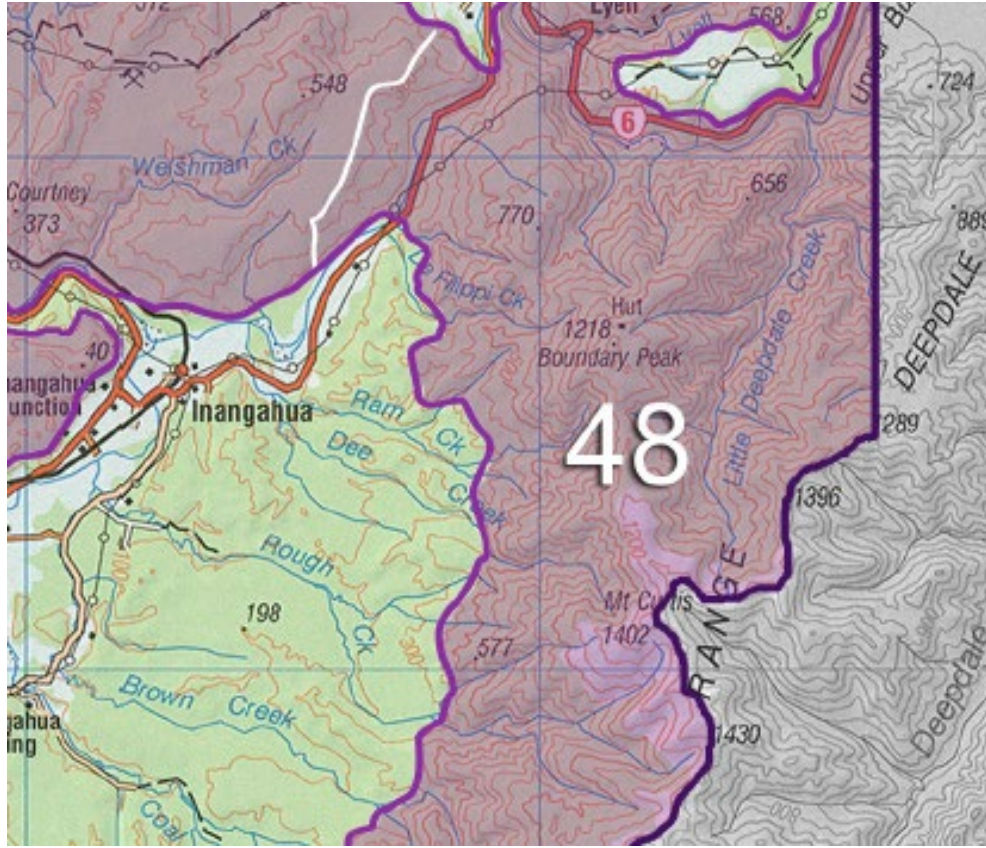
Again, while private property boundaries may coincide with some of these 'edges' or interfaces, but are not meaningful or determinative in their own right from a landscape standpoint. The following aerial image (below) shows a recommended, slightly refined, ONL boundary based on where these characteristics become apparent – both near New Creek and around an area of modified land focused on a farm airfield near the regional boundary. Hopefully, this will address most concerns in relation to private properties overlapping with both ONLs.





## ONLs 48 & 49 Brunner & Lyell Ranges

The key issue raised in relation to this area was the presence of private properties within parts of ONLs 48 and 49.



Looking north from SH6 near Inangahua towards the hills & forest of ONFL49



Looking north from SH6 near Three Channel Flat toward the hills & forest of ONFL49



Looking south from SH6 towards the hills & forest of ONFL48 near Spring & De Filippi Creeks

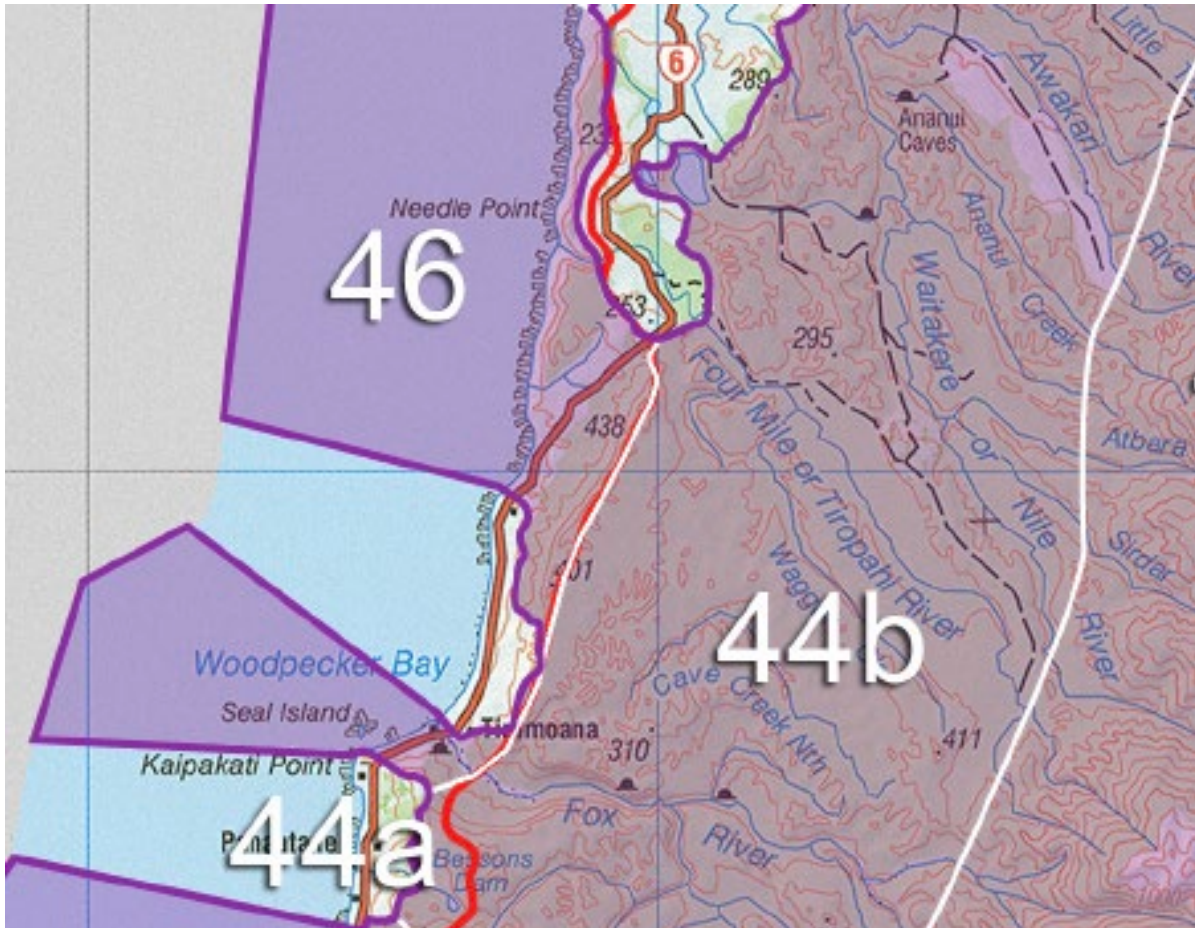
As described for the area near New Creek, the margins of both ONLs are defined by the transition away from farmland on the flats and rolling terrain both sides of the Buller River into ONLs 48 and 49. These ONLs are largely differentiated by the same characteristics described in relation to New Creek.

Consequently, while private property boundaries may coincide with some of the ONL margins, they are not meaningful in their own right from a landscape perspective. The following aerial image (below) shows a recommended, and slightly refined, ONL boundary around eastern Inangahua. Hopefully, this will address most concerns in relation to private properties overlapping with both ONLs.



## ONLs 44 & 46 Paparoa Range West Coastline

The key issue raised in relation to this area was the presence of private properties within parts of ONLs 44 and 46.



Looking south from SH6 near Kaipakati Point towards ONFL44



Looking north from SH6 towards Kaipakati Point & some of the recent development opposite it



**The rising hill country and bush just east of Seal Island above SH6**

The 2012/13 landscape assessment set out to avoid all clusters of residential development down the Paparoa East coastline. However, it also recognised that the presence of some isolated dwellings within the coastline's bush dominated hinterland could be accommodated without compromising the overall value of either ONL. In this regard, the continuity and cohesion of this highly expressive and appealing coastal landscape is important – both in relation to close-up views from SH6 and more distant views from the Irimahuwhero Lookout. For this reason, a small number of quite isolated dwellings were 'captured' by the original ONL mapping of ONL44, especially.

The following aerial (overleaf) adopts the same approach. It embraces those areas that display many of the qualities discussed in Section, which combine to create a spectacular coastal landscape and highway experience, but avoids those areas where modification is more apparent, and those same characteristics are visibly eroded. As a result, the refined ONL44 boundary shown avoids most private properties, but still includes some housing within the ONL's vegetated slopes directly overlooking the Tasman Sea. Again, the proposed delineation of the ONL44 boundary reflects the landscape patterns evident within the coastline around Hatters Bay and Woodpecker Bay, rather than cadastral boundaries.



## ONL41 Paparoa Range East & Mt William Range - Westport Town Water Supply Reserve

The key issue raised in relation to this area was the presence of private properties within parts of ONL41 and, in particular, whether the ONL boundary should be 'pulled back' from parts of the Buller Town Water Supply Reserve and Nine Mile Road.



Approaching the mouth of the Lower Buller Gorge & ONFL41 on SH6 east of Bucklands Peak Rd



Looking up the Lower Buller River from SH6 east of Island Creek



Looking down Nine Mile Rd towards ONFL49 & the Lower Buller Gorge

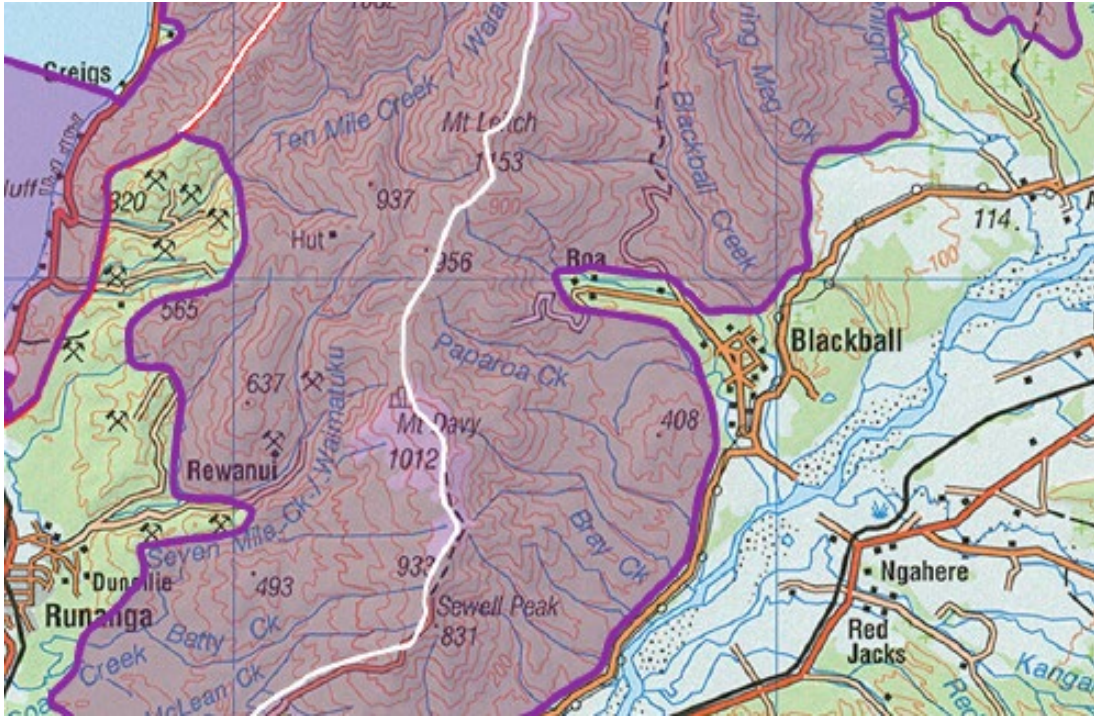
As described above, the edge of ONL41 was primarily determined by those parts of the lower Paparoa Range / Mt William Range that are more expressive, legible and demonstrably 'natural' – as a result of their topography and the presence of semi-mature (regenerating) to mature forest. Such areas were originally incorporated within ONL41 as they also provide the foundation for the sequence of more elevated slopes and peaks (across both ranges) that create a powerful backdrop to the Tasman Sea plain and that frame the mouth of the Lower Buller Gorge.

In my assessment, none of these considerations and factors have changed since 2013 and the values attributed to the slopes of ONL41 facing towards the Tasman Sea and Westport are as important now as then. The aerial below attempts to capture the point at which the uplands and native forest of both Ranges becomes much more obvious and meaningful.



## ONLs 41 & 42 Paparoa Range East & Mt William Range – Blackball

The key issue raised in relation to this area was the presence of private properties, together with areas of both historic and recent mining activity (and modification) within parts of ONLs 41 and 42.



Old mine works near Blackball off Roa Rd



Looking down Roa Rd to the east at the north-western edge of Blackball





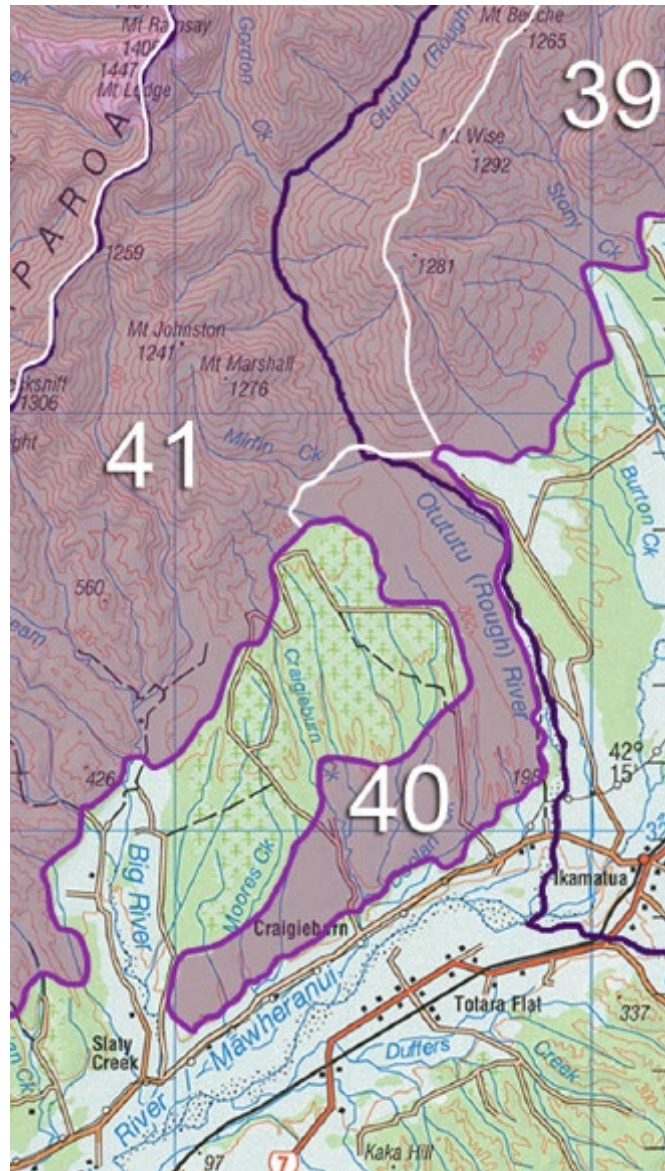
Looking north from Blackball towards the southern Paparoa Range

In 2012/13, it was not possible to fully identify areas of mining activity (past and present) on private land between Blackball and Rewanui. The image shown below extracts those areas from the original mapping of ONLs 41 and 42, and also refines the mapping of the ONL margins west to north-east of Blackball – so as to just retain those areas that retain more expressiveness, naturalness, coherence and aesthetic appeal.



## ONLs 39, 40 & 41 Paparoa Range East – Big River & Otututu River

The key issue raised in relation to this area was the presence of private properties within parts of ONLs 39-41 near Big Creek, together with areas affected by production forestry and farming through to the Otututu / Rough River.



Looking westwards from Slaty Creek Rd towards the hills a& forest of ONFL41



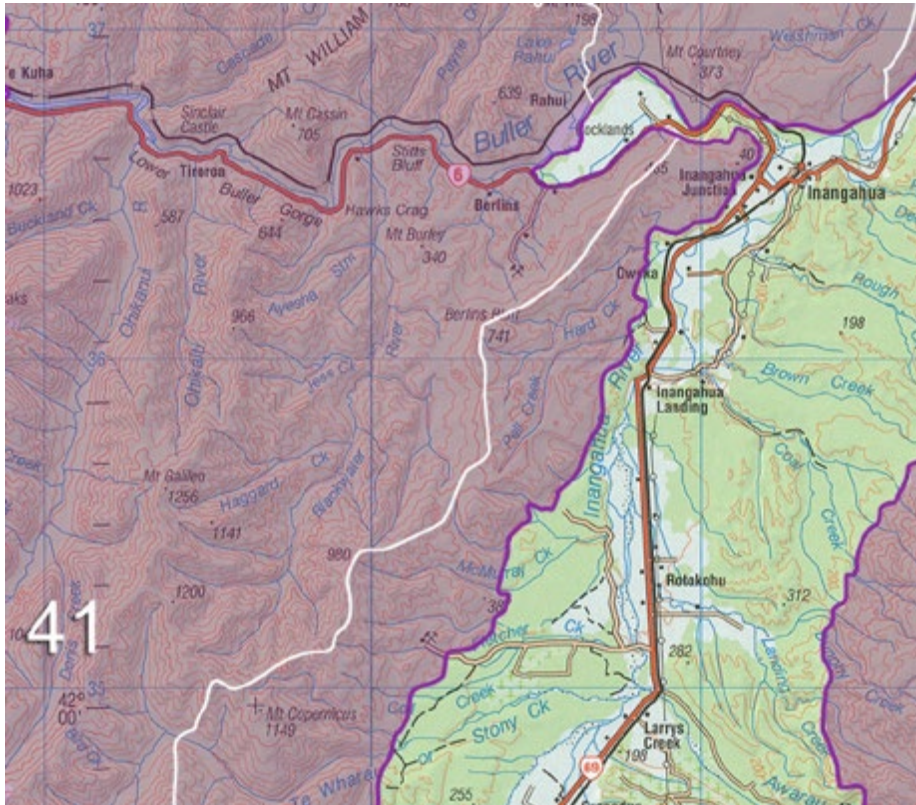
Looking north from Slaty Creek Rd towards the hills & forest of ONFL41

While retaining the extensive mountain Ranges, foothills and forest cover with ONLs 39 and 40, the proposed changes shown below would exclude the private farm properties around Big River, together with those affected by both framing and production forestry activities extending through to the Otututu / Rough River. At the eastern end of ONL39 the proposed changes would reconnect with the 2012/13 mapping in that area.



## ONLs 39 & 41 Paparoa Range East – Berlins to Larrys Creek

Concerns raised in relation to this area related to the presence of private properties within parts of ONLs 39 and 41 near Berlins and Inangahua Landing – stretching down to near Reefton – and the inclusion on mining operations within both ONLs.



Looking north from SH6 near Rocklands towards the far hills & forest of ONFL41



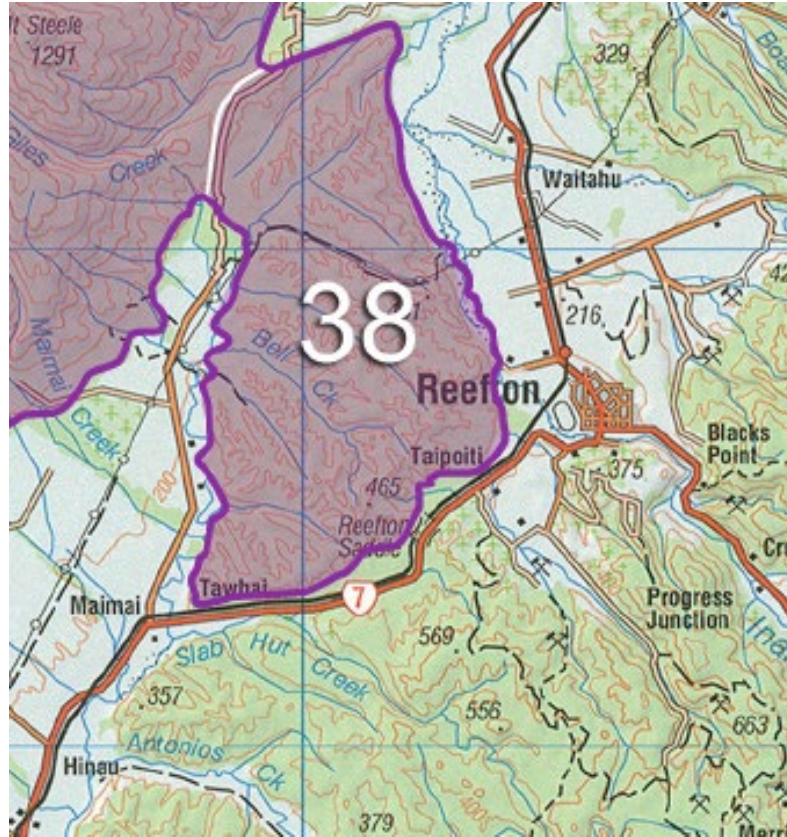
Looking from the junction of SH69 & Perseverance Rd towards the hill country of ONFL39

Again, while retaining the extensive mountain Ranges, foothills and forest cover with ONLs 39 and 40, the changes shown in the aerial image below would exclude the private farm properties around Berlins, together with a catchment south of it affected by mining activities. However, no other area of mining could be identified between Inangahua Junction and the valley catchment north of Reefton (other than the Giles Creek Coal Mine, which is addressed in relation to ONL38, the Reefton Saddle). As for other ONLs, the proposed mapping refines that first prepared in 2012/13 so as to minimise the overlap with private properties in general. However, property boundaries are not specifically employed to redefine the edge of both ONLs.



## ONL38 Reefton Saddle

Key issue raised in relation to this area addressed the overlap of ONL38 with private properties near Maimai Valley Road and Buller Road, as well as the Giles Creek Coal Mine.



Looking east from Maimai Rd near the Mawheraiti Stream towards the plateau & forest of ONFL38



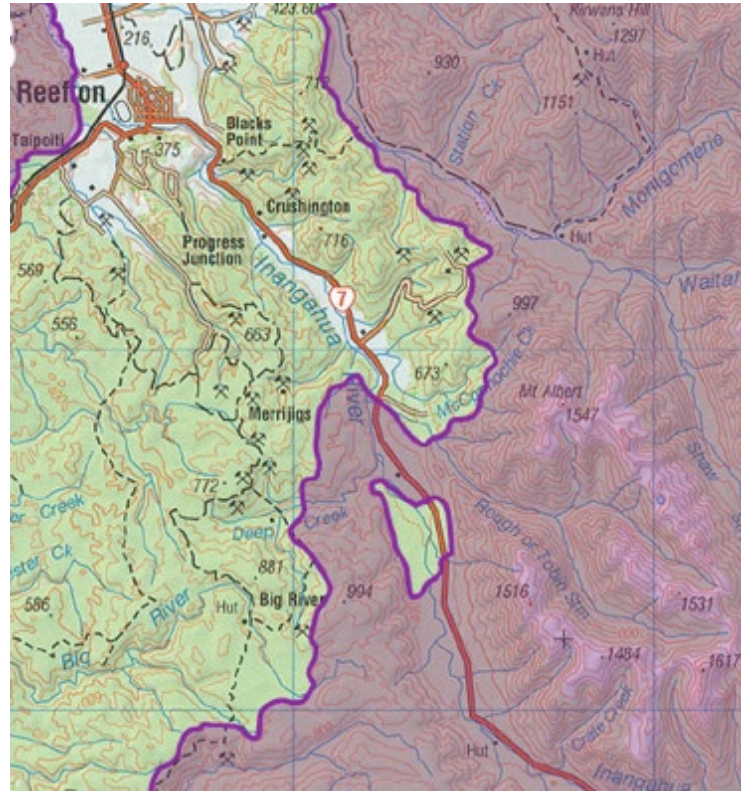
Looking east from Maimai Rd near the Maimai Creek towards the plateau & forest of ONFL38

In response to the matters raised, it is again clear that cadastral boundaries would not provide demarcation of ONLs 38 and 39 that is meaningful in terms of landscape characteristics and values. As with other locations, both ONLs are best defined by a combination of areas of obvious topographic uplift and forest edges – which are, for the most part, clearly apparent. However, at the northern end of Maimai Valley Road, the Giles Creek Coal Mine was previously captured by ONL38. It is recommended that the mine and areas of modification around it be removed from both ONLs, as is shown below. This would separate ONLs 38 and 39 from one another.



## ONL33 Island Block

AS with many other ONLs, concern was raised in relation to this area because of ONL33's spread across some private properties. In addition, it was unclear of the Oceania Gold and Garvey's Creek Mines were affected by that ONL.



Looking south-east from SH7 near Garvey Creek towards the hill country & forest of ONFL33



Looking south-east from SH7 near Craigs Clearing towards the hill country & forest of ONFL33

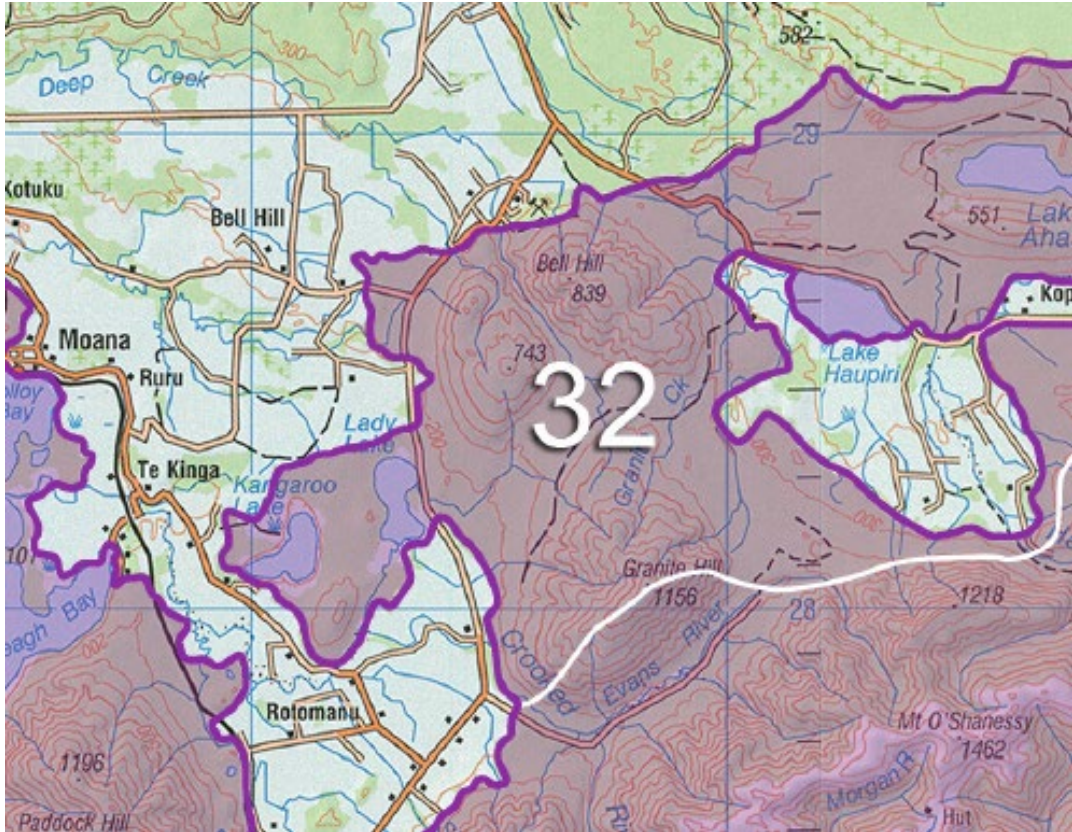


My evaluation of the ONL shows that part of the Garvey's Creek Mine extends into part of ONL33, while the Oceania Gold Mine – to the south – sits on its edge. Accordingly, the aerial below shows the boundaries around both mines adjusted to avoid the immediate mine catchments and accessways to them. In addition, it is recommended that the ONL boundaries be relocated, as shown below, so as to avoid areas of farming activity on the river flats and a stand of pine forestry.



## ONL32 Kangaroo Lake

The main issues identified in relation to the area around ONL32 pertain to its overlap of private properties and modification of the local landscape that has occurred since 2012/13.



Looking across Lady Lake & part of ONL32 from Bell Hill Rd



Looking south down Bell Hill Rd towards the hill country & forest around Bell Hill & ONL32



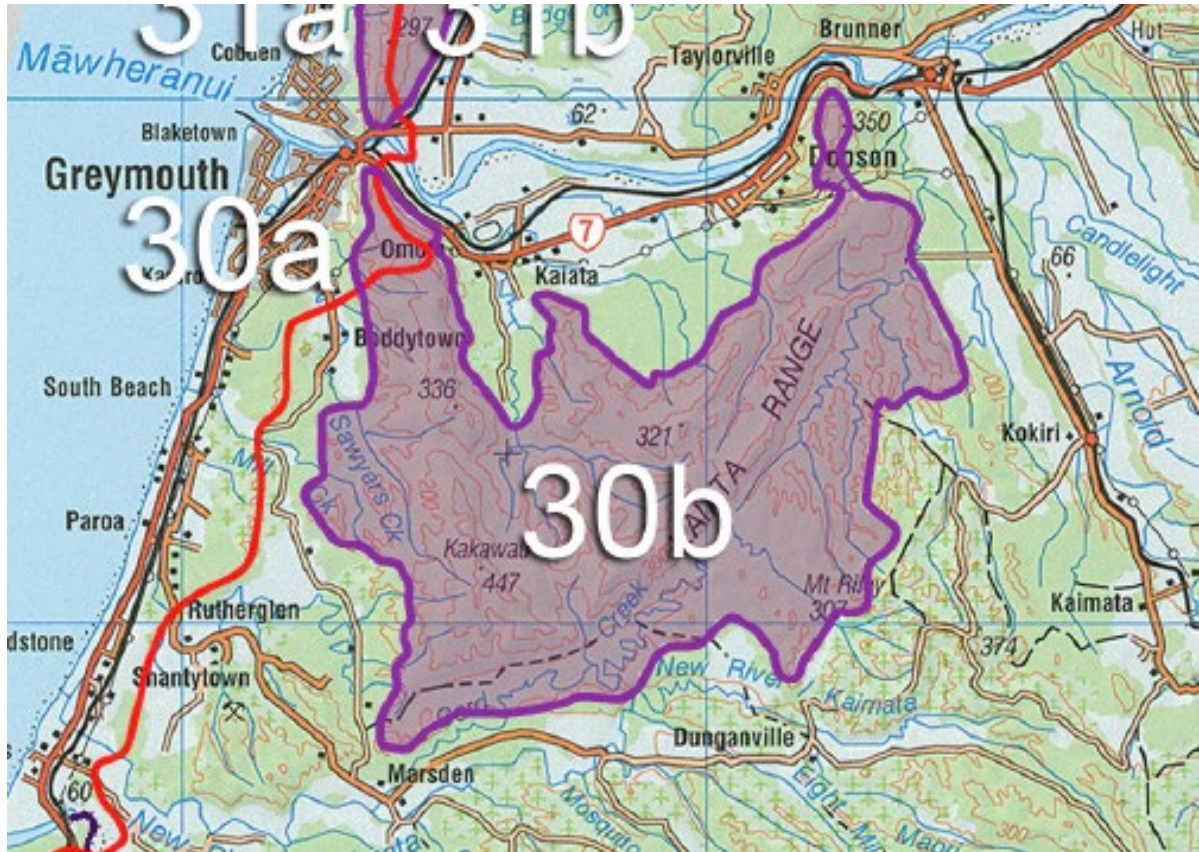
Looking south towards Bell Hill across cleared land near Haupiri Rd

ONL32 was originally located so as to capture the sequence of lakes and their margins east of Lake Brunner, extending from Kangaroo Lake to the Ahaura River. As with other ONLs, this re-assessment has provided the opportunity to more accurately define the ONL, focusing on its lakes, their margins, prominent foothills and large tracts of native forest. These display high levels of continuity and cohesion, naturalness and aesthetic appeal – which often contrasts markedly with the farmland and some forest blocks between them. In addition, it is recommended – as shown below – that the ONL should avoid areas of recent bush clearance near Haupiri Road, west of Lake Haupiri. The more refined ONL boundaries indicated would also help to avoid those parts of local properties that are being actively used at present.



## ONL30 Kaiata Range and Peter Range - Near Dobson and Greymouth

The key issue raised in relation to the Kaiata Range and Peter Range was, again, that of ONL30's encroachment on private properties.



Looking towards Mt Buckley & other hills behind Dobson from SH7

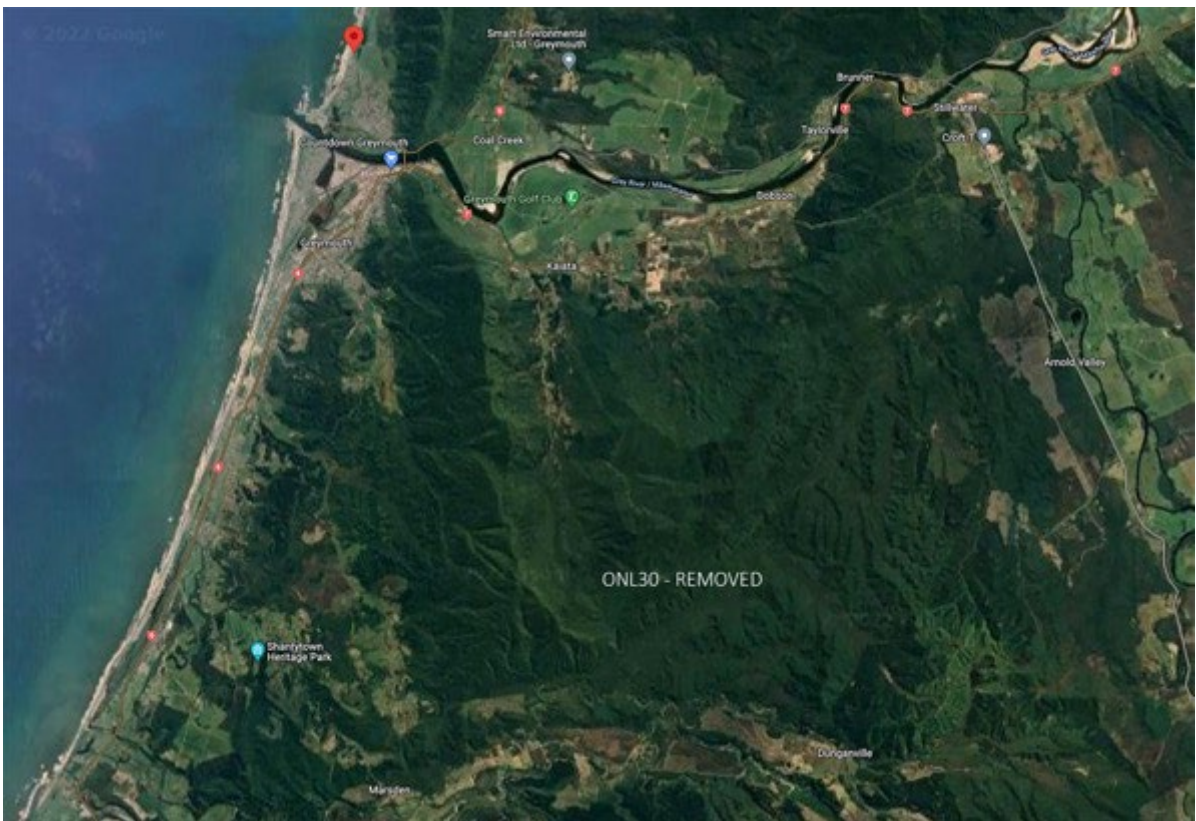


Looking south-west from Fairhall Rd, near SH7, towards Peter Ridge



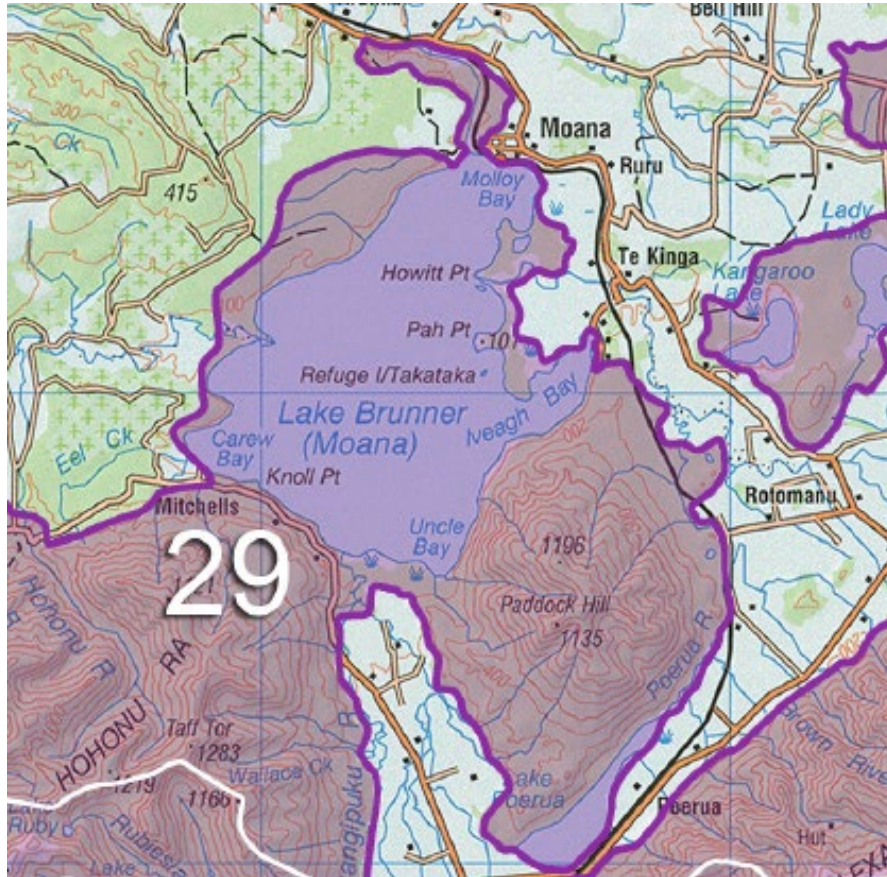
Looking across The Grey River towards Greymouth & Peter Ridge

After fully reviewing ONL30, both in the context of the Grey District and wider Region, I have concluded that ONL30 does not retain sufficient naturalness or – viewed from locations around Kaiata and Dobson, especially – display sufficient expressiveness and expressiveness to qualify as an ONL. This hill country sequence was always a margin selection as an ONL, based largely on its value as the primary backdrop to both Greymouth and Dobson. However, it is now very much on the cusp of being outstanding and significant at either the regional or district level. On balance, I consider that it falls slightly below the threshold of being an ‘outstanding’ landscape.



## ONL29 Lake Brunner

As with other locations, the primary concern in relation to ONL 28 appears to be that of its spread across private properties. In addition, there has been significant development around the western and northern margins of Lake Brunner since 2013.

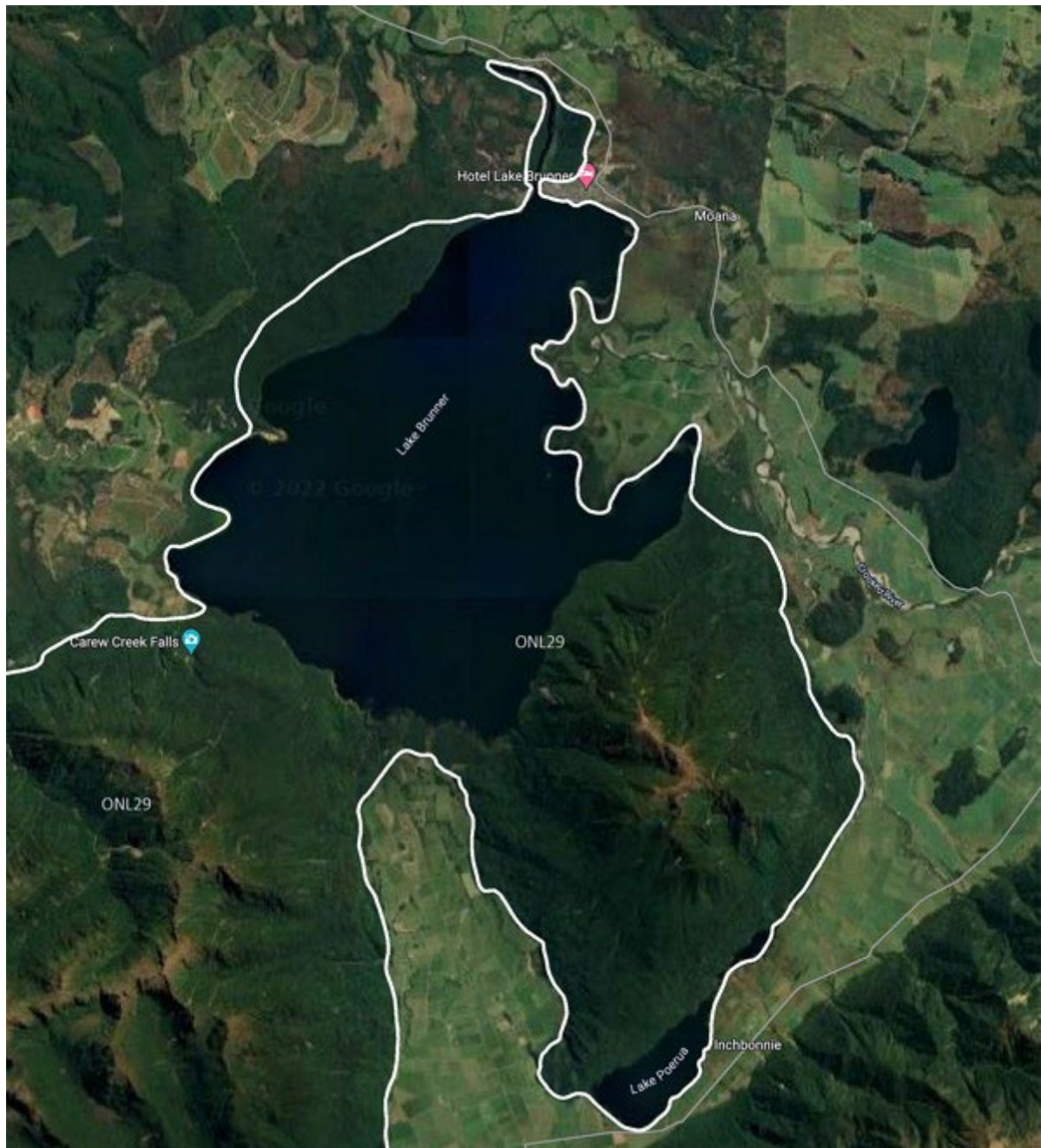


Looking towards Lake Poerua & ONFL29 from Lake Brunner Rd



Looking across Lake Brunner from Kumara Inchbowie Rd near Swan Bay

My site visits to Lake Brunner have confirmed that modification has occurred around parts of Lake Brunner since 2013, but mostly within areas outside ONL29. Again, the water body of the lake, together with wetlands along its southern and eastern margins, Lake Poerua and rising terrain covered in native forest to the south and west, anchor this ONL. The margins of those features are readily apparent and meaningful from a landscape standpoint, whereas private property boundaries – which are coincident with some of these ‘edges’ – are not a valid surrogate for them as possible ONL boundaries. Again, therefore, my recommendations – shown in the image below – focus on refinement of the ONL29 margins to avoid areas of current farming activity and development as far as is practicable without eroding the characteristics and integrity of the ONL.



## ONLs 27 & 28 Taramakau River

The key issue raised in relation to ONL28 also pertains to its 'encroachment' on private properties both sides of the Taramakau River.



Looking north-west from SH73 across the plain around the Taramakau River towards the hill country & forest of ONFL 28



Looking north from SH73 up the Taramakau River valley between the Hohonu & Bald Ranges of ONFL 28



Looking up the Taramakau River near its junction with the Taipo River towards the hill country & forest of ONFL 28





Looking north-west towards the Hohonu Range & the Taramakau River from SH7 near Rocky Point

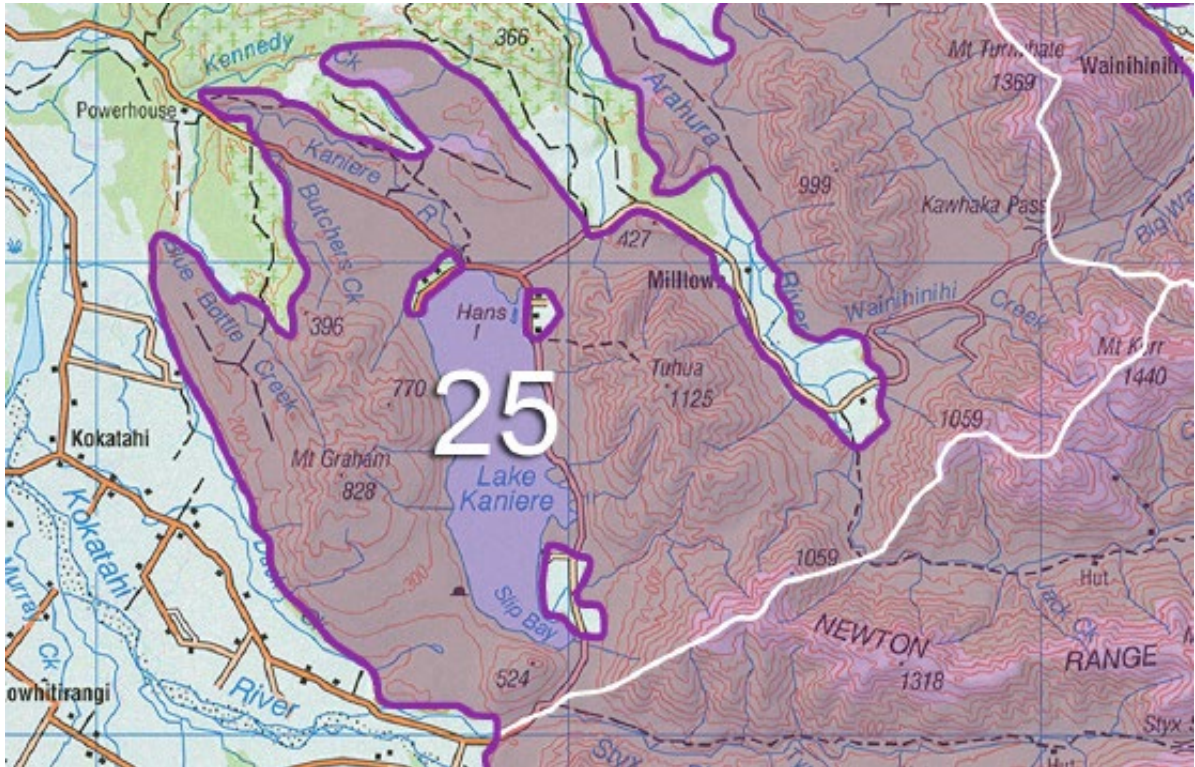
After reviewing the river valley enclosed by ONLs 27 and 28, it is my assessment that their boundaries should logically follow the edge of the ranges, together with their extensive forest cover, that enclose the Taramakau River and its flats. Below the confluence with the Otira River, this ONL 'edge' coincides with the northern bank of the river fairway.

In my opinion, the ONL boundaries proposed below are therefore legible on the ground and robust from a landscape standpoint. By contrast, the use of property boundaries would have little meaning or value. Even so, the proposed boundaries would avoid areas of farming activity and other development as far as is practicable, and are much more precise than those proposed in 2013.



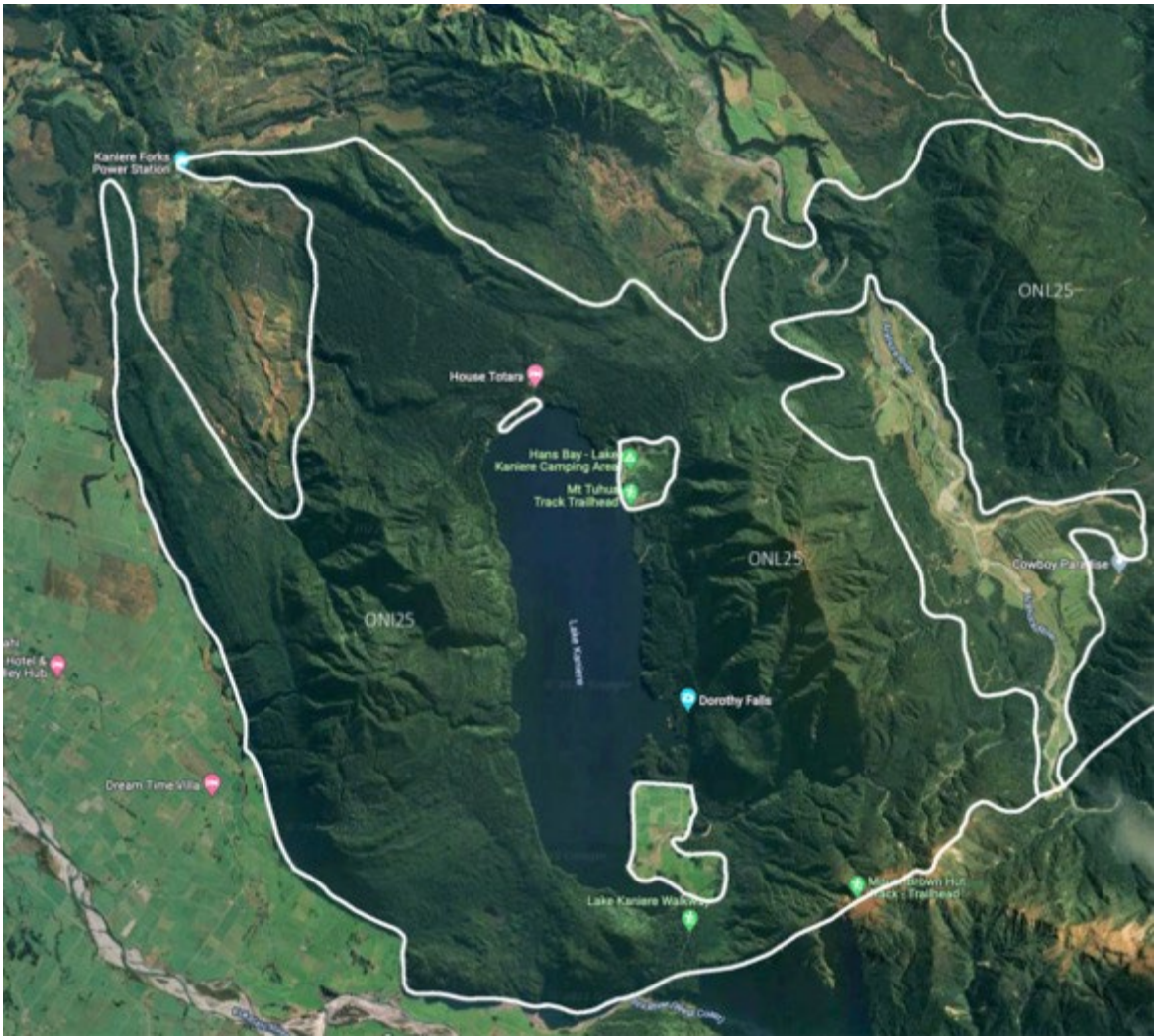
## ONL25 Lake Kaniere & Arahura River

Again, the main issues identified in relation to the area around Lake Kaniere relate to the presence of private properties within ONL25, although forestry and other activities on the margins of the ONL was also identified as a matter of some concern in relation to its boundary.



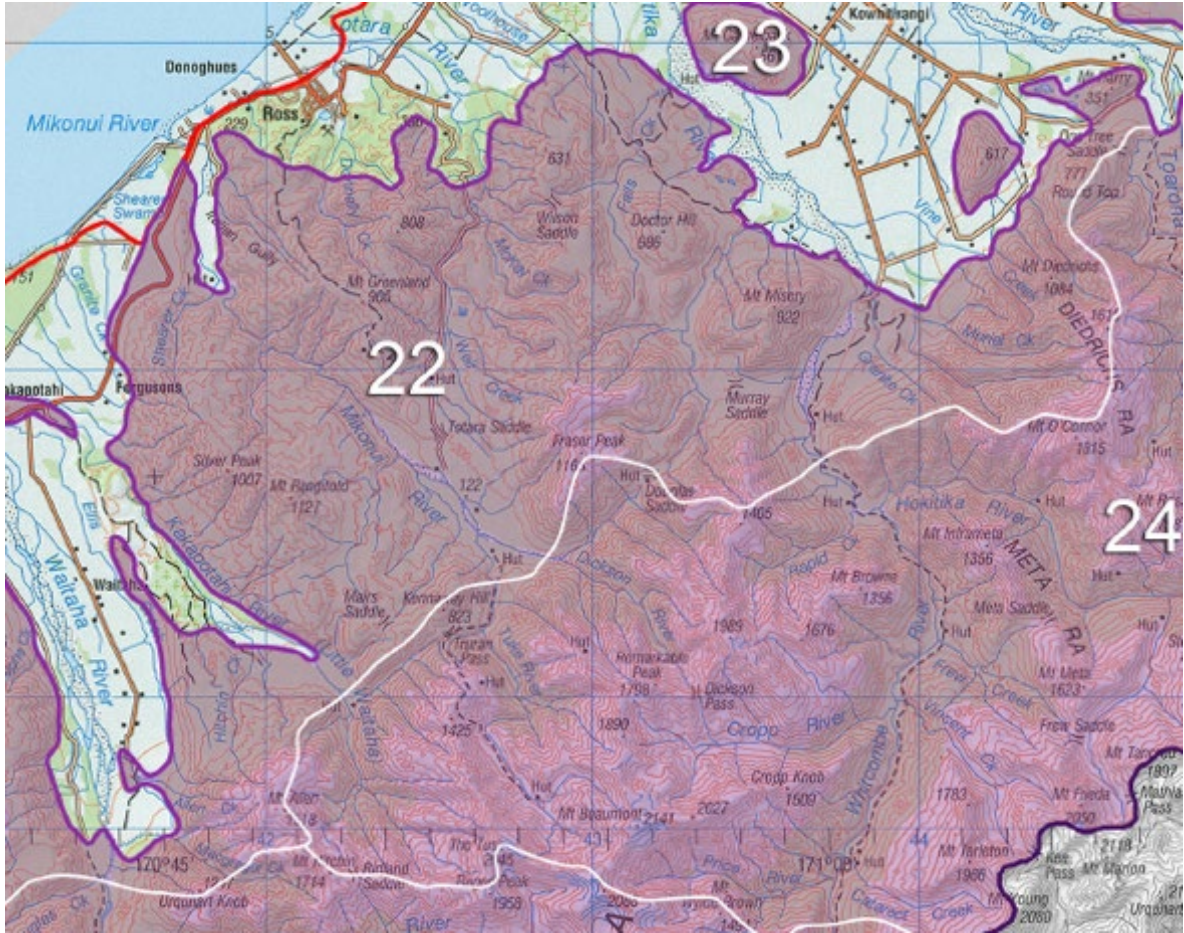
Based on my reassessment of the area around Lake Kaniere, it is clear that many of the subtle variations in land use activities and vegetation cover near Lake Kaniere and the upper Arahura River valley were not accurately identified in 2012 and 2013. The coarseness of the NZMS 260 mapping used as a base at that time was particularly problematic for areas like those east of the lake.

Using the much more recent imagery now available from Google Maps, I have refined the proposed boundary for ONL25, as shown overleaf. This would avoid the areas of production forestry and landscape modification north to east of Lake Kaniere, together with the farmland and other forms of development (such as the 'Cowboy Paradise' development) near the upper Arahura River. On the other hand, it would also capture part of the Arahura River – together with a deeply incised valley and bush – near Milltown Road that was not previously within ONL25.



## ONL22 Kokatahi

The main concern identified in relation to the Kokatahi area is (once more) that of the ONL's overlap with private properties.



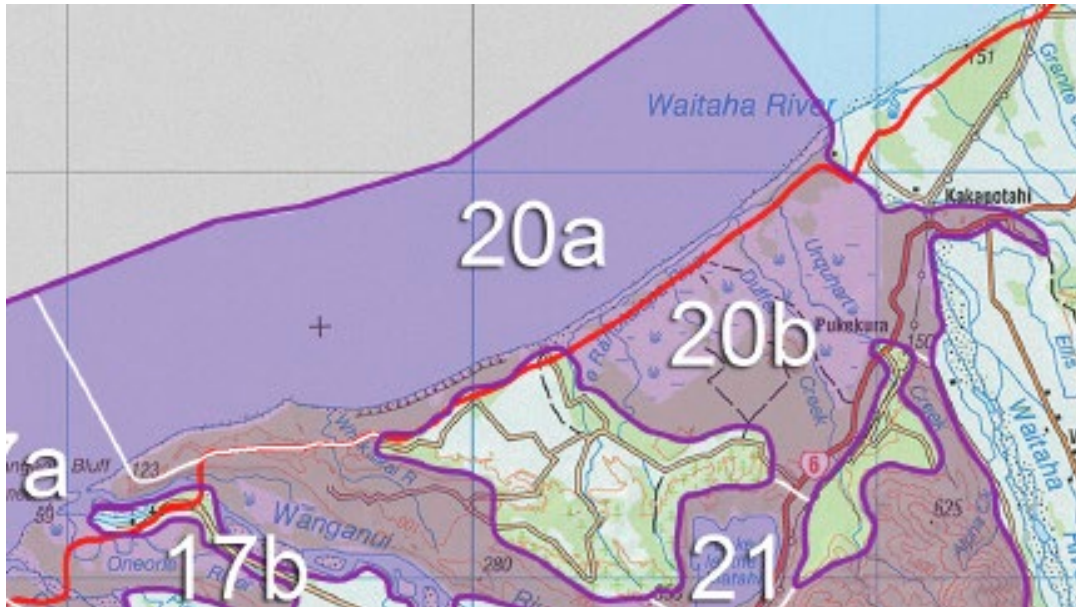
The Hokitika Gorge & part of ONFL22

In response to this, I would propose revisions to ONL22 that – based on the more accurate aerial imagery now available – avoid private properties and areas of farming activity as much as is practicable. At the same time, the revised ONL would skirt most areas of lowland bush near Ross, instead focusing primarily on those areas connected with the range of hill country anchored by the Ford Ridge. This area includes the DoC estate around the Hokitika Gorge.



## ONL 20 Kakapotahi / Duffers Creek

Again, the main issues identified in relation to the area near Lake around Lake Matahi / Ianthe relate to the presence of private properties within ONL20, and other modification within that same ONL.



Most of the land north of Lake Ianthe is screened from public view and access is largely limited to private driveways and accessways. Consequently, much like the area near Lake Kaniere, ONL20's past mapping has suffered from a lack of insight into 'on the ground' activities and the coarseness of both the NZMS 260 and aerial images available in 2012-13. The imagery now available is much more precise and helps to 'make sense' of the landscape within and around the ONL, extending through to the edge of Alp[ha] Creek. Consequently, it is considered that the revised / refined mapping shown below should be adopted. This would greatly reduce ONL20's incursion into private properties and associated areas of activity.



## ONLs 15 & 17 Whataroa

The key issue identified in relation to the area near Whataroa is the presence of private properties within ONLs 15 and 17.



The original mapping of both ONLs suffered from the same lack of precision identified in relation to various ONLs described above – due primarily to the poor quality of aerial images available (for just part of Westland) and the scale of the NZMS 260 mapping used as a mapping base in 2012-13.

Consequently, it is considered that the revised / refined mapping, shown below and overleaf, should be adopted. This is much more precise than was previously the case and would significantly reduce ONL 15 and 17's incursion into private properties.

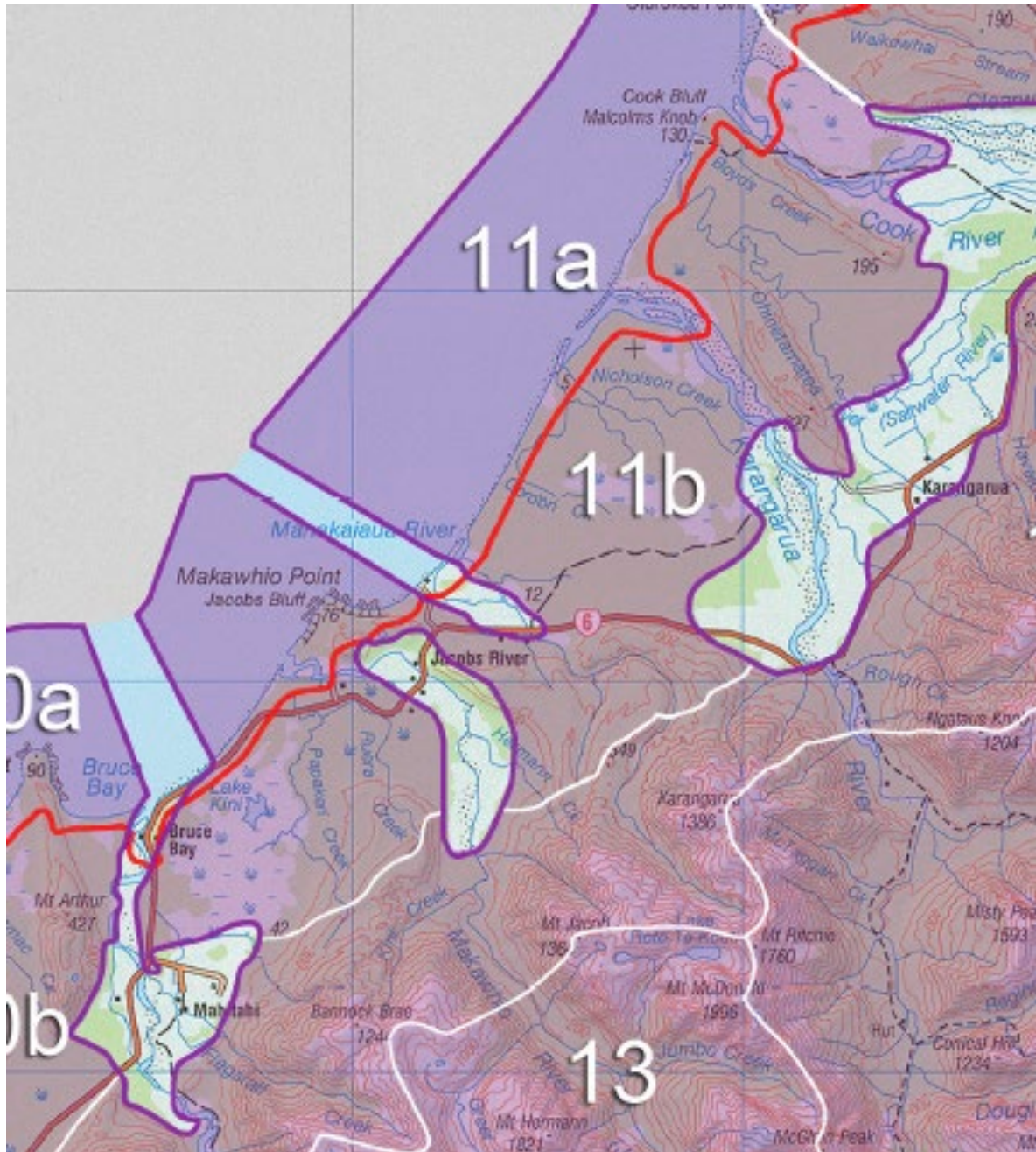






## ONL 11 Mahitahi / Makaawhio

The key issue identified in relation to the area near Bruce Bay and Jacobs Creek is the presence of private properties within ONL11.



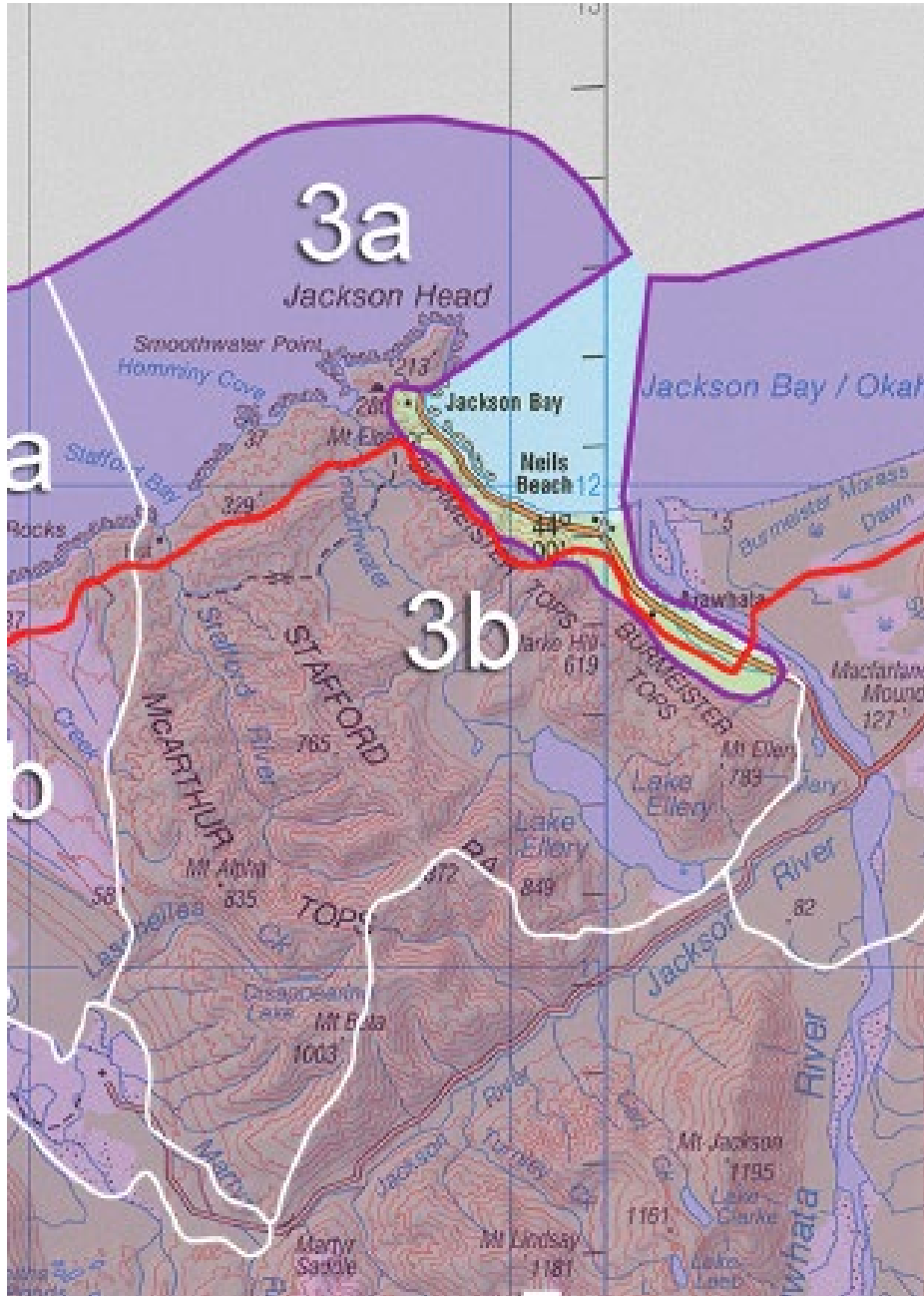
Again, the original mapping of ONL11 suffered from the same lack of precision identified in relation to various ONLs described above – due primarily to the poor quality of aerial images available (for just part of Westland) and the scale of the NZMS 260 mapping used as a mapping base in 2012-13.

Consequently, it is considered that the revised / refined mapping, shown below and overleaf, should be adopted. This is much more precise than was previously the case and would significantly reduce ONL11's incursion into private properties and area of activity on them.



### ONL 3 Jackson Bay

The key issue identified in relation to the area near Jackson Bay is the presence of private properties within ONL3.



Again, the original mapping of ONL11 suffered from the same lack of precision identified in relation to various ONLs described above – due primarily to the poor quality of aerial images available (for just part of Westland) and the scale of the NZMS 260 mapping used as a mapping base in 2012-13.

Consequently, it is considered that the revised / refined mapping, shown below and overleaf, should be adopted. This is much more precise than was previously the case and would significantly reduce ONL11's incursion into private properties and area of activity on them.



### 3. HNC & ONC Areas Review

---

The following are brief summarises of the review findings for each of the HNC and ONC Areas set out in Section 1, together with a brief precis of the rationale for those findings and associated maps, aerials and (where available) photos.

## HNC Area C58 Oparara River

Key concerns raised in relation to HNC Area C58 relate to its inland extent and modification of the identified HNC Area since 2013.



Looking north-west from Oparara Rd towards the Oparara River & wetlands of HNC Area C58



Looking north from Oparara Rd towards the Oparara River & wetlands of HNC Area C58

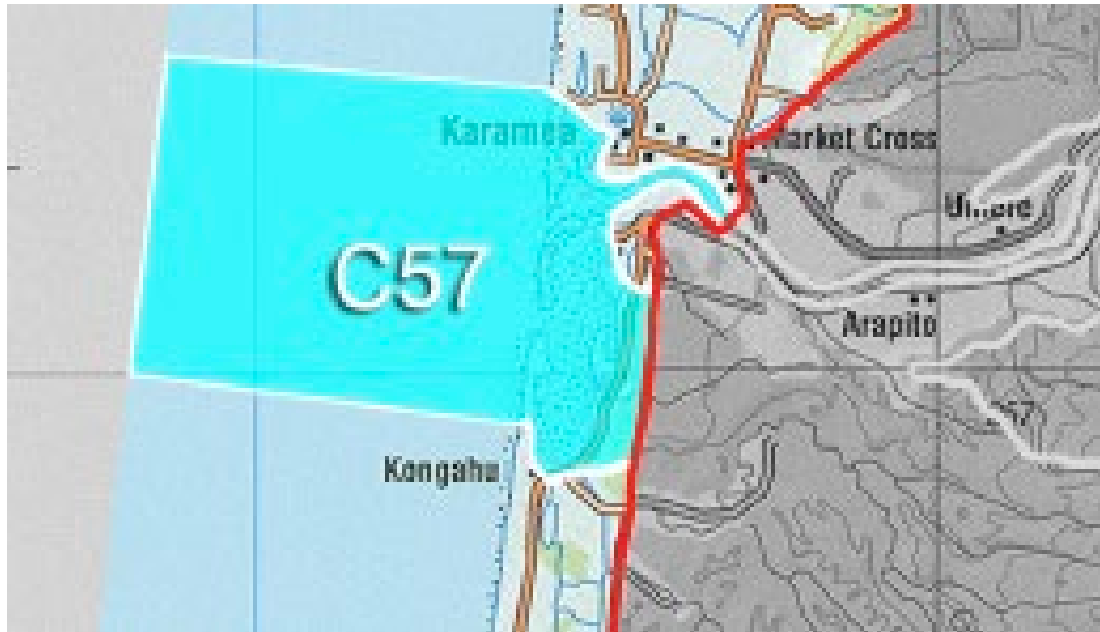
Coastal plains and terraces are fundamentally coastal landforms that are directly linked to the CMA, both in terms of their physical formation and heritage, and their perceived association with the sea. As such, they are located within the Coastal Environment. At Oparara, this is reinforced by the presence of a coastal wetland that is linked to the Tasman Sea by the tidal reach of the Oparara River. Flanked by species that range from saltmarsh to coastal shrubland and (some) forest, this area has a sense of connection with the nearby sea, and retains significant naturalness – both biophysically and perceptually: it is a natural remnant of the much more extensive wetlands that would once have dominated much of the Karamea / Oparara coastline. At the same time, however, parts of the previously identified wetland / HNC Area have been drained and converted to pasture.

Reflecting this situation, the aerial overleaf shows a revised boundary for HNC Area C58 that more accurately reflects its current extent.



## HNC Area C57 Karamea River Mouth

Once more, the primary concerns raised in relation to HNC Area C57 pertain to its inland extent and modification of the identified HNC Area since 2013.



Looking towards the Tasman Sea & salt marsh / wetlands of HNC Area C57 from the Karamea Highway



Looking inland from the Karamea Highway north of Granite Creek



Looking north from Granite Creek Rd towards some of the wetland of HNC Area C57 around the Creek



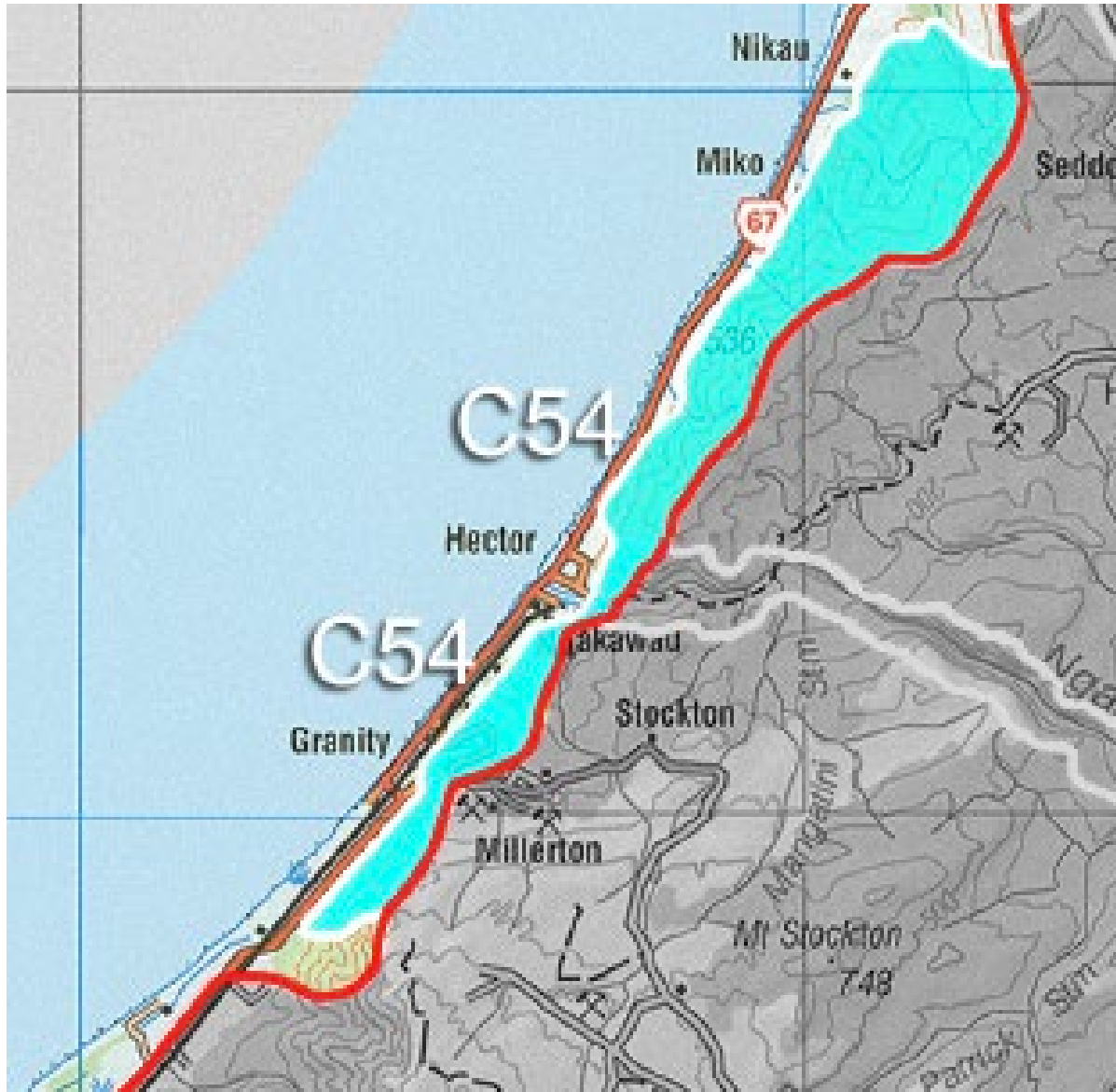
As stated for HNC Area C58, flats, plains and terraces linked to the CMA comprise part of the Coastal Environment are fundamentally coastal landforms that are directly linked to the CMA, both in terms of their physical formation and heritage and their perceived association with the sea. This is reinforced by the presence of a lagoon, tidal river corridor, low dunes, salt marsh, and other native coastal shrubs that are directly linked to the Tasman Sea. This area – either side of the Karamea River – retains significant naturalness, both biophysically and perceptually, despite being directly flanked by farmland. At the same time, however, parts of the previously identified wetland / HNC Area near Kongahu, have been subject to drainage and modification, while the original mapping of HNC Area 57 is now inaccurate in a number of locations.

Reflecting this situation, the aerial overleaf shows a revised boundary for HNC Area C57 that more accurately reflects its current extent.



## HNC Area C54 Granity, Hector & Ngakawau

The key issue of concern in relation to HNC Area 54 is its overlap with parts of both settlements, together with the Ngakawau ridge, which includes the Stockton Mine cableway.



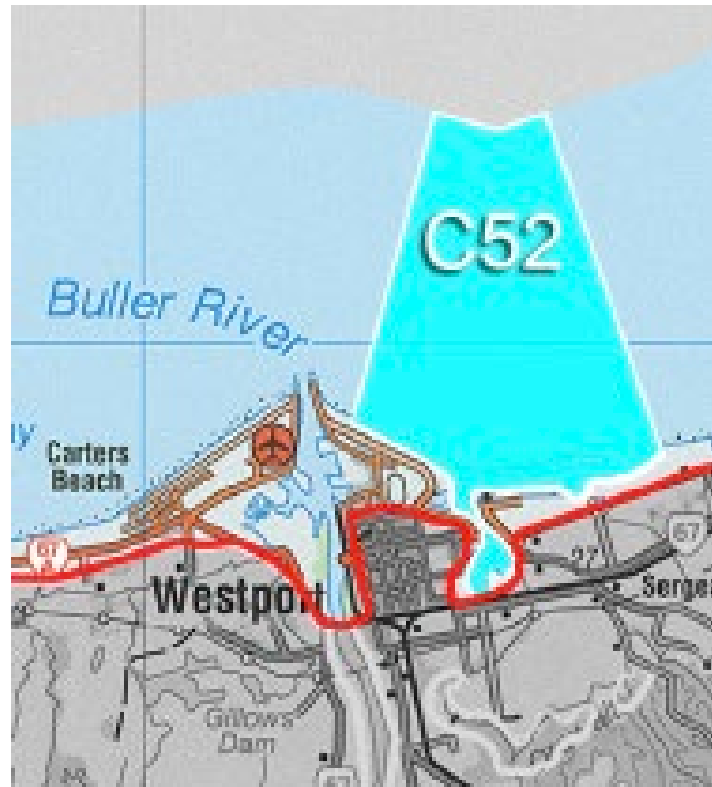
The original mapping of HNC Area 54 was, like that for other HNC / ONC Areas, very broad brush. As a result, the HNC Area does overlap both areas of settlement on the coast and some areas associated with mining activity and transportation links. The aerial images overlaid refine the original mapping to retain the key ridge slopes facing directly towards the Tasman Sea (covered in coastal shrubland and some forest), but avoids these areas of modification and activity.





## HNC Area C52 Orowaiti Lagoon

The key issue raised in relation to HNC Area C52 area is the accuracy of its delineation.



Looking across Orowaiti Lagoon & HNC Area C52 from Orowaiti Rd



Looking across the southern lagoon area from Brougham St



Orowaiti Lagoon & HNC Area C52 viewed from near the speedway & racecourse



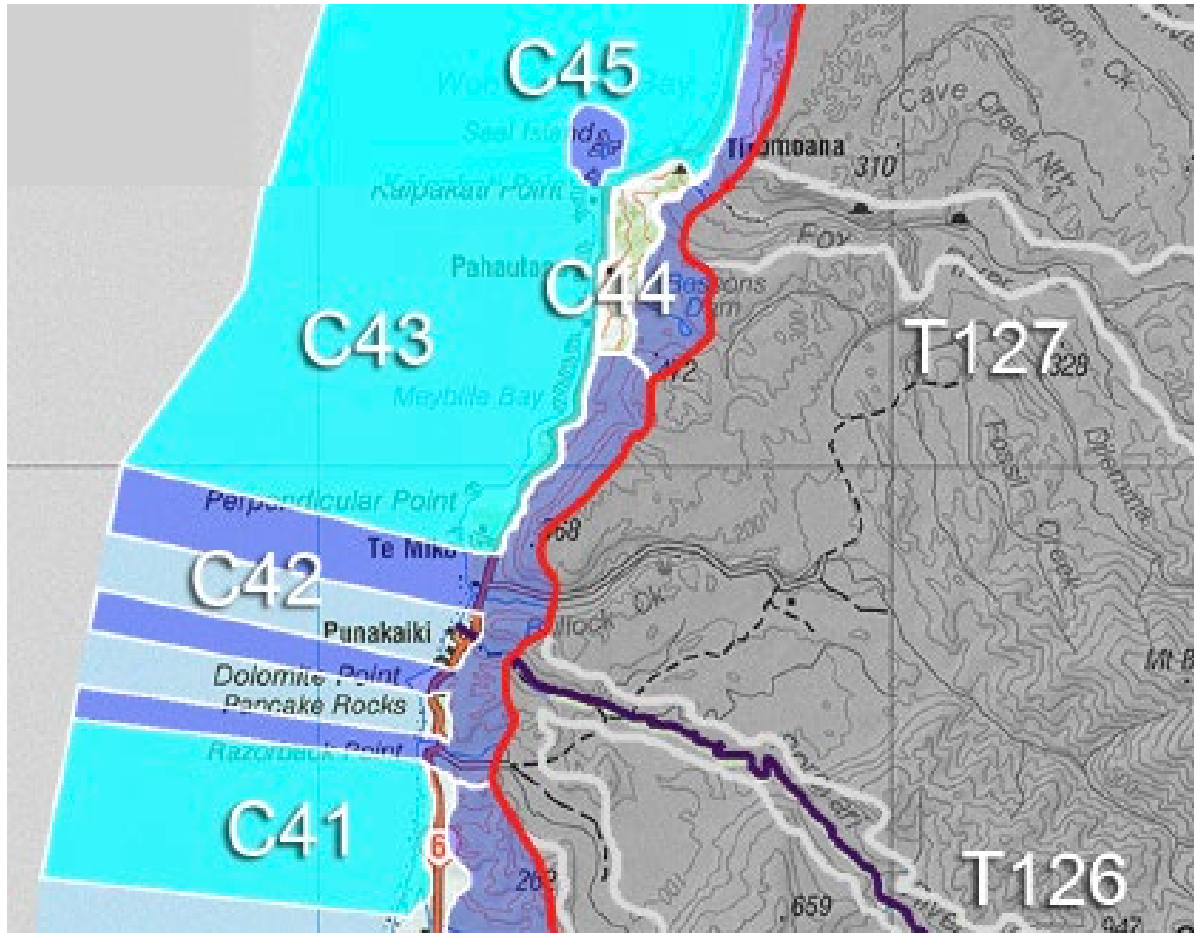
Looking towards the Tasman Sea across the dunes at the edge of HNC Area C52

Much like HNC Area C57, the Orowaiti Lagoon comprises a lagoon and river estuary, dunes, saltmarsh and some pockets of native coastal vegetation that are directly linked to the Tasman Sea. However, its 2012/13 mapping was coarse and very high level. The delineation of HNC Area C52 shown below captures the full array of coastal elements, features and processes within the Coastal Environment – that are also connected to the CMA – in a much more precise fashion than was previously the case.



## ONC Area C42 & HNC Area 43 Fox River to Punakaiki

Concerns raised in relation to the area around Punakaiki and Te Miko – extending towards the Fox River – relate to the ‘lack of protection’ afforded key parts of that coastline, including the Punakaiki Rocks and the coastline either side of Perpendicular Point (including Te Miko).



The original mapping of ONC Area 42 set out to reflect the exceptional natural character values of the Punakaiki Rocks area and the area where Te Miko meets Perpendicular Point. However, those areas dominated, or strongly influenced, by the visitor accommodation development between Razorback Point and the ‘Pancake Rocks’, together with the settled area of Punakaiki Village, were excluded from the HNC and ONC areas. Between these two extremes, the area around, and to the north, of Perpendicular Point affected by residential development – but still largely natural – was attributed HNC status in 2012/13.

The following aerial (overleaf) fine-tunes this mapping with more precision than was possible at that time. This results in recommended changes to ONC Area 42 that would see it both extending along the coastline north of Perpendicular Point and merging with an enlarged ONC Area C44 traversing the hill cliffs and escarpments around, and behind, Meybills Bay. HNC Area C43 would be reduced to a series of pockets that wrap around residential dwellings – both near Te Miko and within approaching Kaipatiki Point.

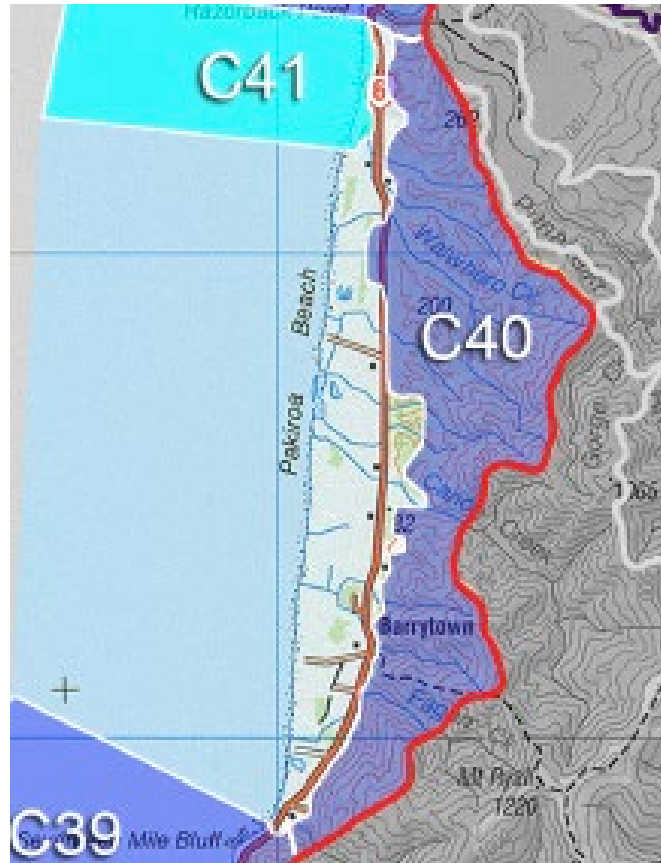






## ONC Area C40 Barrytown Flats

The key matters raised in relation to this area pertain to the delineation of ONC Area C40, with part of it extending westwards over SH6, and its 'capture' of multiple private properties.



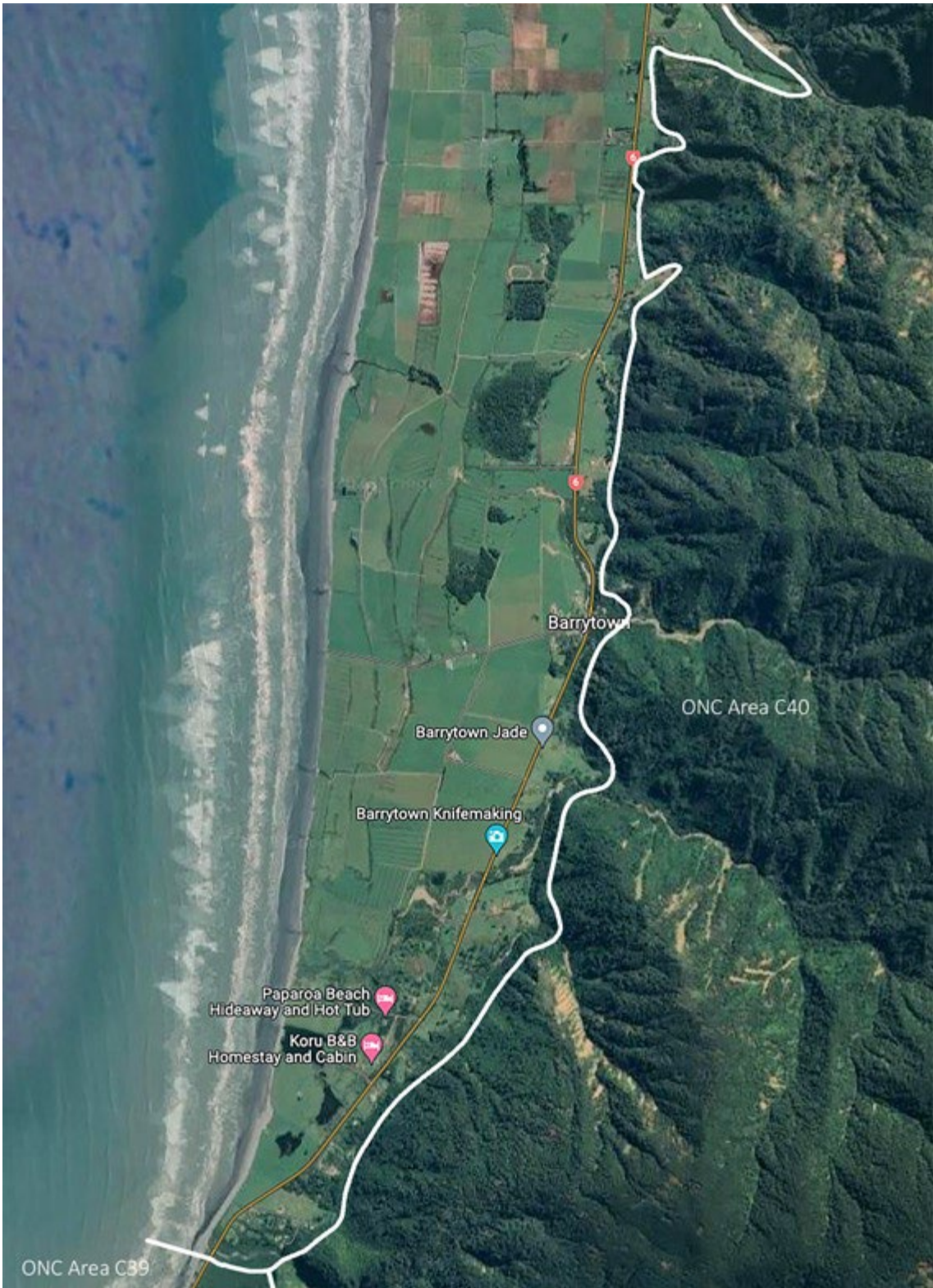
Looking across the coastal plain of proposed HNC Area C40 from SH6 north of Barrytown



Looking south across the coastal plain of proposed HNC Area C40 from SH6 just north of Barrytown

As with other HNC and ONC Areas, above, the following shows the boundary of ONC Area C40 re-defined, using accurate and up-to-date aerial imagery. Most of this ONC Area would remain east of SH6, with just an area of remnant coastal forest crossing the highway – extending towards the Tasman Sea, but not reaching it. Additionally, I have reviewed the status of this area and determined that the farmland across Barrytown's coastal flats exert considerable influence over the ONC Area defined in 2013. Consequently, I would recommend changing ONC Area C40 to HNC Area C40. Together with refinement of the ONC / HNC boundary, this would reduce the 'encroachment' on private properties around Barrytown.





## HNC Area C36 Peter Ridge

Concerns have also been raised about the HNC Area status of the hills and native forest above and behind Greymouth, on the Peter Ridge (in a similar vein to ONL30).



Looking towards Greymouth & Peter Ridge over Cobden Island & the Grey River

In my assessment, the natural character values of the Peter Ridge are now sufficiently affected, and compromised, by its juxtaposition with Greymouth's urban that both HNC Areas identified in 2013 should be removed – as shown on the aerial image overleaf. In particular, I am concerned that while the ridge stands out in more distant views, Greymouth remains clearly interposed between it and the CMA when experienced from closer up, and development has already impacted on the HNC Area's margins. Accordingly, I no longer consider that it is worthy of the status attributed Peter Ridge in 2013.



## HNC Area C35 Karoro South Beach to Camerons

The key concern identified in relation to HNC Area C35 is its delineation and encroachment of private properties.



Looking across the wetland within HNC Area C35 from near the wetland information centre & car park on SH6

In my opinion, the core HNC Area remains valid and is appropriately identified. However, some of its margins are not accurate. Consequently, I would recommend refinement and fine-tuning of the HNC Area boundary, as is shown of the aerial image overleaf.





## HNC Area C33 Chesterfield Terraces

The key matter raised in relation to both coastal terrace fore-slopes is the delineation of HNC Area C33 on the Regional Council's digital maps.



Looking towards the elevated coastal terrace within the southern half of HNC Area C33 north of Awatuna



Looking towards the elevated coastal terrace within the northern half of HNC Area C33 north of Chesterfield Rd



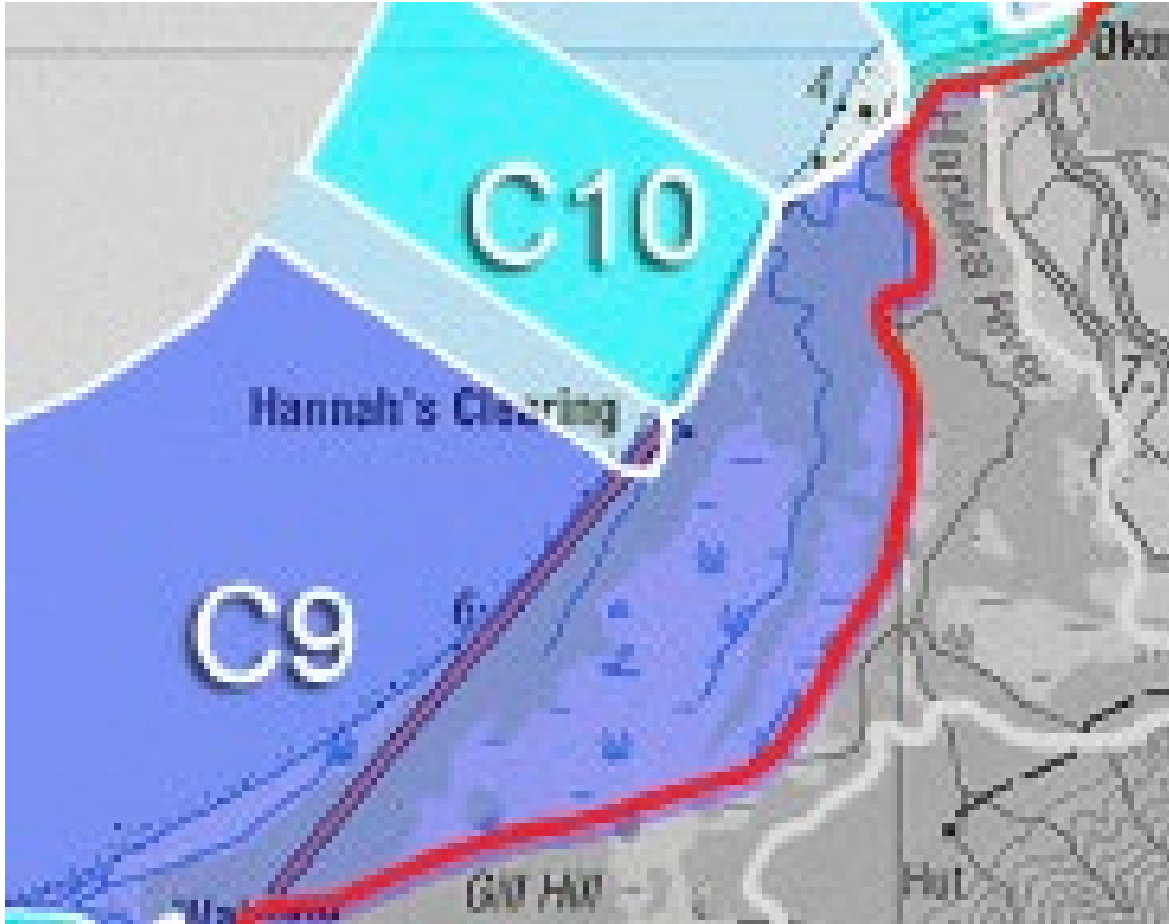
Looking towards the edge of the southern terrace (Not HNC Area) immediately south of Chesterfield Rd

Having reviewed the Council mapping for HNC Area C33, it appears that both linear ‘nodes’ appear to have slid inland – off the coastal fore-slopes and coastal shrubland onto the plateaux behind those slopes. The following aerial shows my recommendations for a revised HNC Area C33, starting near the railway line and SH6 and terminating on the crest of the fore-slopes. However, this recommendation needs to be, in turn, reviewed by Regional Council staff to ensure that the inland edge of this HNC Area terminates at that crest, as the images shown below do not incorporate contour information, The revised HNC Area boundary would also avoid areas of more obvious development and modification on both ridge faces.

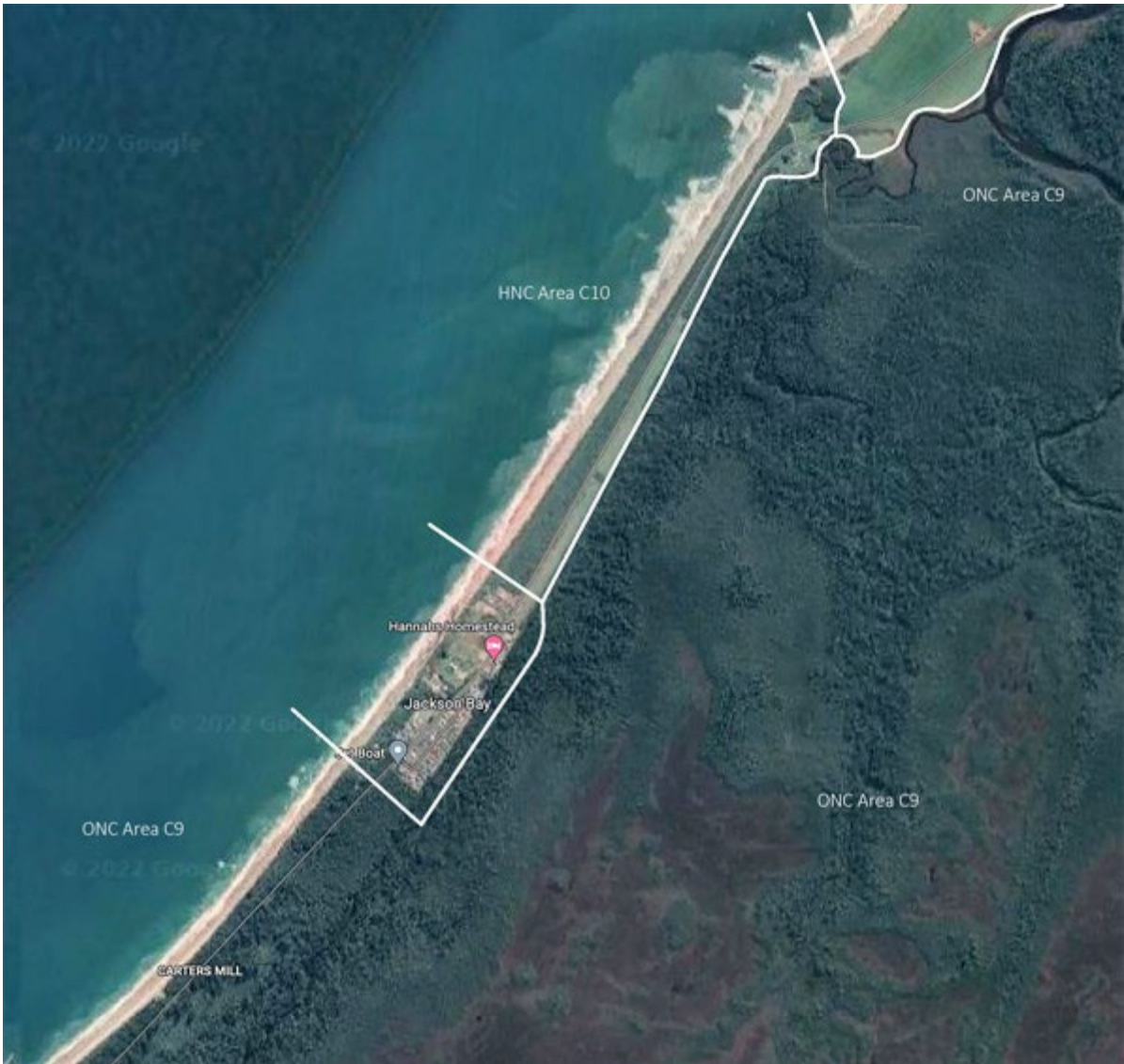


## HNC Areas C9 & C10 Arahura (Hannahs Clearing)

Concern was raised about the way in which Council's mapping of ONC Area C9 shows it overlapping the settlement at Hannahs Clearing.

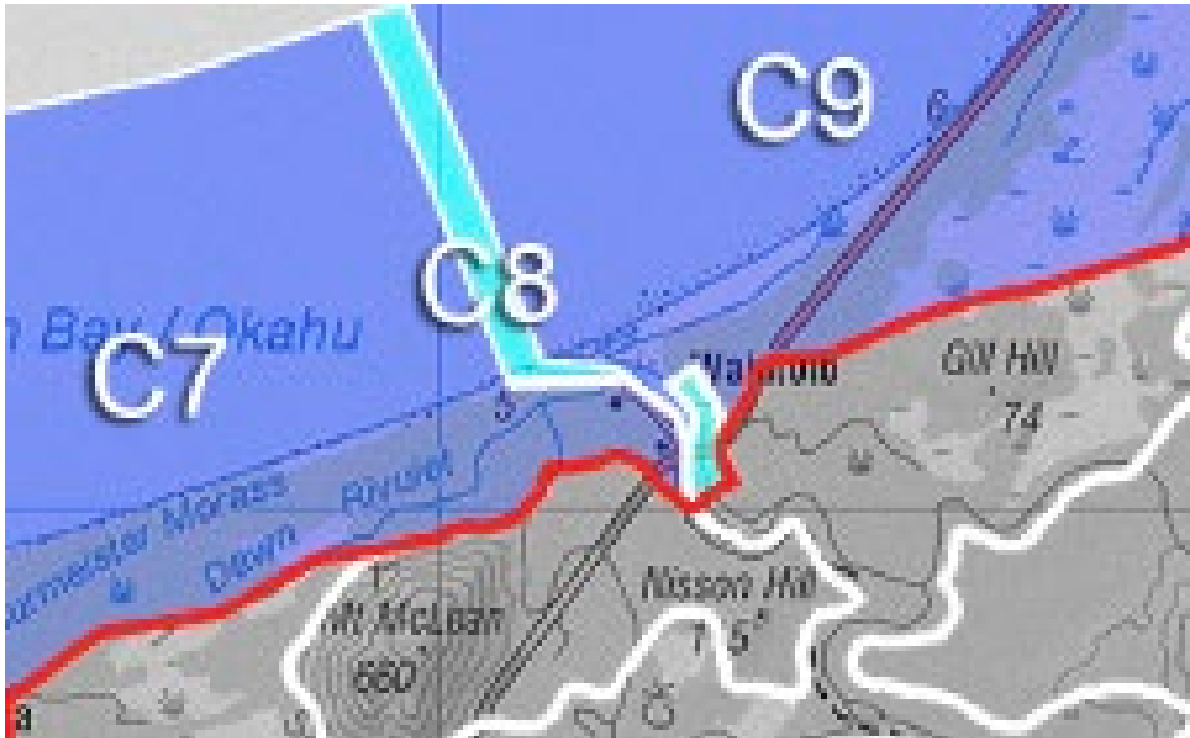


In reality, as shown on the aerial image overleaf, Hannahs Clearing should have been excluded from the settlement. In my view, ONC Area C9 and HNC Area C10 should be revised reflect the modified boundaries shown on that aerial. This would also leave a small buffer area between Hannahs Clearing and ONC Area C9, and would more accurately define the edge of the adjoining HNC Area C10.



## ONC Area C9 Waitototo Lagoon and Wetland

The key issue identified in relation HNC Area C10 near the Waitototo River.



Unfortunately, the 2012/13 mapping for the area around the Waitototo River reflects the lack of detail found in the NZMS mapping employed at that time. The much more detailed aerial imagery now available allows for more accurate plotting of the ONC and HNC boundaries near the River. Consequently, it is my opinion that Council's maps should be redrawn to reflect the changes recommended overleaf.



## 4. Summary

---

Having reviewed the areas of concern identified by the West Coast Regional Council, it is clear that many of the mapping errors identified in this review are derived from:

- The 1:50,000 scale of the NZMS mapping employed in 2012/ 13;
- The limited aerial photography available at that time – moreso away from Westport, Greymouth and Hokitika, as well as across Westland more generally;
- The difficulty of accessing properties away from the public domain of local roads and reserves;
- The inadvertent relocation of at least one HNC Area in the process of transference from the original landscape study maps to the Regional Council's digital data base.

I have rectified those ONL and HNC/ONC Area boundaries in response to Council's identification of areas of concern in the brief received from Council. However, it is equally clear that the persistent issue of ONLs and HNC/ONC Areas encroaching on private properties could be partly (though, not wholly) addressed via the sort of re-mapping shown in this report.

On the other hand, regional scale maps are often quite broad-brush, and it is inevitable that some ONLs and HNC/ONC Areas would still capture private properties, as the RMA is primarily directed at the management of NZ's private domain (as opposed to its national, regional and district reserves, and the DoC estate more generally). Put simply, the boundaries of ONLs and HNC/ONC Areas occasionally align with those of private properties and their interface with DoC land and other reserves / parks, but that is rarely the case. Boundaries that are meaningful from a landscape standpoint must respond to the terrain, vegetation, water areas and land uses found in any area, irrespective of cadastral boundaries. Having said this, it is hoped that the sort of realigned boundaries shown in this report would, at the very least, appreciably reduce the degree to which ONLs and HNC/ONC Areas 'capture' private properties and areas of private activity.



## Stephen Brown

BTP, Dip LA, Fellow NZILA





# Project Manager Update

**1 March 2022 – 31 March 2022**

Prepared By: **Jo Armstrong**  
Date Prepared: **31 March 2022**

## Accomplishments this Period

- March was a month largely focussed on feedback to the Exposure Draft. The feedback period closed on 11 March. Written responses were received from 236 separate individuals and entities, and 175 spoke to the Planning Team at meetings and drop-in sessions over a 2 week period.
- All written feedback is available to Committee members on Teams.
- The Senior Planner did an amazing job running the drop-in sessions and meetings. Thank you to Committee members and council planners who supported her at a number of the venues.
- There was one incident of concern that highlighted the need for us all to look out for the safety of the Planning Team and Committee members. Please show your support by attending future consultation on the draft and proposed Plans.
- Final research and development of the Coastal and Land Instability Hazards draft provisions happened in March. This included TTPP Technical Advisory Team input, plus a presentation and discussion with the four councils' elected officials and iwi representatives.
- The Coastal and Land Instability Hazards Draft document was presented at the 29 March Committee meeting for final approval to take out for community feedback. Changes were made to the final documents after Committee input.
- The feedback period for this document will be 4-22 April. Hard copies of the document will be available at 18 venues across the districts and meetings will be held at high risk coastal communities.
- The itinerary for this final round of consultation on the draft provisions is presented below. Committee members are encouraged to attend meetings in their district.

Date	Time	Venue
Monday 11 April	8.00 - 9.30am	Haast – Haast Hotel
Monday 11 April	11.00 -12.00	Mahi Tahī - Te Tauraka Waka a Maui Marae
Monday 11 April	2.30 - 4.00pm	Okarito - Donovan's Store
Monday 11 April	6.00 – 7.30pm	Hokitika – Westland RSA 22 Sewell St
Tuesday 12 April	12.00 -1.30pm	Punakaiki - Paparoa National Park Visitor Centre Workshop
Tuesday 12 April	5.30 -7.00pm	Greymouth – GDC Chambers

Wednesday 13 April	12.00 – 2.00pm	Granity/Ngakawau – Ngakawau Hall
Thurs 14 April	5.30 -7.30pm	Franz Josef – St John’s Meeting Room

- A report from this consultation will be brought to the Committee’s May meeting.
- Further work will be undertaken on Westport-specific provisions, to be presented to the community at a later date.
- Advertising about the Coastal and Land Instability Draft Document, where to access it, and details of the drop-in sessions and meetings will be placed in the four main newspapers and in Northern Buller Bay. Posters will also be displayed at sites throughout the region.
- Some communities have asked for additional meetings on the draft provisions. Due to the tight timeframe for notification prior to the local body elections, any further consultation would be limited.
- Work on a number of chapters for the Section 32 report continued. The Joint Committee is required to undertake an evaluation of any Proposed TTPP provision before notifying those provisions. The s32 evaluation report provides the reasoning and rationale for the proposed provisions and should be read in conjunction with those provisions, with the degree of detail of the assessment correlating to the scale and significance of the anticipated effect of the provisions (s32(1)(C)).
- Our landscape contractor Stephen Brown, has completed his field assessment and provided an early draft of his report for planner comment.
- This year has been an exceptionally busy one for the Planning Team, requiring input from a consultant planner to review plan integration and consistency. Further planning help is likely to be needed prior to notifying the Proposed Plan.
- The 29 April Committee meeting will be via Zoom at this stage, but I will ascertain Westland District Council Covid policy closer to the time, and arrange an in-person meeting if possible. The meeting will include detailed discussion on more than minor feedback, its implications and recommendations.
- Covid Update – Meetings will occur in person whenever possible.

### Plans for Next Period

- Drop-in sessions and meetings for the Coastal and Land Instability Draft Document
- Peer review of plan integration and consistency
- Peer review of natural hazards provisions
- Writing chapters for the Section 32 Cost Benefit Analysis to accompany the Proposed Plan in July
- Updating WCRC Resource Management Committee
- TTPPC meeting by Zoom and possibly at WDC on Friday 29 April at 9.45am.

### Key Issues, Risks & Concerns

Item	Action/Resolution	Responsible	Completion Date
Not getting key stakeholder buy-in	Contact and meet with them individually. Plan stakeholder workshops and on-going engagement process	Project Manager	Ongoing
Not producing a proposed plan in a timely manner	Set achievable milestones and monitor/report progress. Identify additional expertise and/or capacity	Project Manager Planning Team	30 June 2022
Decision makers can’t agree	Get agreement on pieces of work prior to plan completion	Chairman	Ongoing
Budget insufficient for timely plan delivery	Work with TTPPC to recommend budget, and with WCRC to raise rate to achieve deliverables	Project Manager TTPP Committee CE WCRC	Annually Jan/Feb

Item	Action/Resolution	Responsible	Completion Date
Changes to national legislation	Planning team keep selves, Committee and Community updated on changes to legislation and the implications for TTPP	Project Manager Planning Team	Ongoing
Staff safety at public consultation	Committee members to proactively address & redirect aggressive behavior towards staff	TTPP Committee	Ongoing
National emergencies such as Covid-19 lock down	Staff and Committee ensure personal safety and continue to work remotely as able. Work with contractors to expedite work.	Project Manager TTPP Committee	Ongoing
Committee delay or reduce scope of required research	Committee ensure timely research is enabled	TTPP Committee	Ongoing
Time and Cost of Appeals Process	Realistic budget set for best case costs. Awareness that contentious issues such as SNAs, natural hazards, mineral extraction and landscape provisions could see an extended appeals process, increasing costs to reach operative plan status	TTPP Committee TTPP Steering Group Project Manager	Ongoing
Fast track budget insufficient to meet new timing for Proposed Plan notification by 14 July 2022	Project Manager to report monthly on whether anticipated expenditure for the remainder of the period is on track to be met by the allocated budget	Project Manager TTPP Committee	31 July 2022
Insufficient capacity for council and iwi technical staff to input fully into Draft and Proposed Plans	Planning Team provide outline of needs for technical input. TTPP Steering Group determine best delivery of technical services	Project Manager TTPP Steering Group	30 June 2022
Unable to meet 14 July 2022 notification date	Keep Committee informed of delays and investigate mitigation options	Project Manager TTPP Steering Group	31 July 2022
Risk of confidential, unverified or draft information being made public, negatively impacting development of TTPP (financially and/or time line) along with the outcomes for the West Coast	Ensure Committee members adhere to Standing Orders	Committee Chair	Ongoing
TTPP staff undeliverable work load to July 2022	Support current staff and consider contracting additional staff if required to meet timeframes	Project Manager TTPP Committee	14 July 2022

## Status

<b>Overall</b>		
Schedule		Work programme revised and achieving on schedule, but capacity of researchers to deliver to earlier timeframe uncertain
Resources		Staff capacity stretched under fast track
Scope		Deliver efficient, effective and consistent Te Tai o Poutini Plan

## Schedule

Stage	Target Completion	Revised Fast Track Completion	Comments
Complete project initiation documentation	30-Apr-19	19-July-2019	TTPPC approved
Identify and contact key stakeholders	03-May-19	Ongoing	Connection made with all key stakeholders and started a second round of contact with other interested parties
Contract senior planning	01-Aug-19	29-July-2019	Contract in place 29/7/19 -30/6/20

Stage	Target Completion	Revised Fast Track Completion	Comments
consultant			
Recruit permanent senior planner	30-Sep-19	7-Sep-2019	Started at WCRC on 14 October 2019
Set up Te Tai o Poutini Plan website and communications package	30-Sep-19	30 Nov- 2019	Development complete. Available at <a href="http://www.ttp.westcoast.govt.nz">www.ttp.westcoast.govt.nz</a>
Set planning milestones	31-Oct-19	30 Aug-2019	Presented at August 2019 TTPPC meeting
Hold key stakeholder workshop for Settlements section	28-Feb-20	23 Oct and 21 Nov 2019	Greymouth and Hokitika, then Westport
Hold Community information meetings	31-Mar-20	16-27 Mar 20 and 24-22 Sep 2020	Roadshow in March 2020 and opportunities to coincide with council-community meetings and local events Outcome of Roadshow to be presented to May TTPPC meeting
Hold key stakeholder workshops for Infrastructure section	30-Apr-20	31-Jul-20	Greymouth and Hokitika, then Westport. Delayed due to Covid-19 Lockdown
Draft Provisions (Issues, Objectives, Policy and Rules) for Urban Areas developed	31-May-20	31-May-20	For presentation to May TTPPC meeting
Workshop discussion with environmental interests re biodiversity provisions	30-Jul-20	31-Aug-20	Delayed due to Covid-19 Lockdown
Draft Provisions (Issues, Objectives, Policy and Rules) for Rural Zones and Settlement Zones developed	31 – Aug-20	31-Aug-20	For presentation to August TTPPC meeting
Hold key stakeholder workshops for mining and extractive industries	31-Aug-20	31-Jul-20	Due to work programme changes during Covid-19 lockdown
Historic Heritage Workshops	31-Aug-20	31-Aug-20	
Conclude TTPP Roadshow	30 –Sep-20	30-Sep-20	Postponed due to COVID-19
Workshop with agricultural interests re biodiversity provisions	30-Oct-20	28 October 2020	
On Hold - Contact with landowners re SNA assessment, landowner meetings			To discuss potential SNAs and seek permission if we do field assessments.
On Hold - Field work for SNA assessments			Begin with drive-by evaluation prior to possible property assessment at owner invitation
Zoning changes proposed	31-Dec-21	30 September 2021	Specific zone change proposals will come to the Committee through 2021
Targeted stakeholder consultation on draft provisions of Te Tai o Poutini Plan	30-May-22	30 September 2021	Targeted consultation with stakeholders on draft provisions with the aim of addressing concerns at this more informal stage
Iwi review of draft Te Tai o Poutini Plan	30-July-22	20 November 2021	This is in addition to hui and consultation throughout the development process and is a mandatory step
Full “Draft” Te Tai o Poutini Plan to Committee	30-Sep-22	16 December 2021	A draft Plan will not have legal status, but will show all the cumulative decisions of the Committee
Consultation on “Draft” Te Tai o Poutini Plan	Oct-22	11 March 2022	Targeted consultation – industry and interest groups meetings. Draft Plan also available for wider community feedback, and community drop-in sessions. Note that while we will be seeking feedback on the “Draft” Plan, some

Stage	Target Completion	Revised Fast Track Completion	Comments
			work will still be being undertaken and would feed into the final “Proposed Plan”, not this pre-notification draft.
Further Natural Hazards Consultation	22-Apr-22	22-Apr-22	Consultation document and drop-in sessions on Coastal Hazards and Land Instability hazard provisions.
Amendment of “ <b>Draft</b> ” Plan to “Proposed Plan” provisions	30-Nov-22	21 June 2022	Feedback to Committee on results of Exposure Draft consultation, any legal opinions on contentious provisions and final decisions.
Notify Te Tai o Poutini Plan	30-Aug-23	14 July 2022	This will be the “ <b>Proposed</b> ” Plan
Submissions on Te Tai o Poutini Plan	30-Oct-23	30 September 2022	40 working days for submissions is the legal requirement
Local Body Elections		October 2022	
Further Submissions	30-Feb-24	30 November 2022	Submissions must be summarised and published and then there is a 20 working day period for further submissions [this part of the process may no longer be required depending on RMA reform progress]
Hearings Te Tai o Poutini Plan	31-August-24	28 April 2023	Indicative time only
Decisions Te Tai o Poutini Plan	30-Sep-24	31 October 2023	Indicative time only
Appeal Period	30-June-25	30 November 2023	Indicative time only. Any parts of the Plan not appealed are completely operative from the end of the Appeal Period.
Ongoing Decision Making for TTPP	November 2025 onward	November 2023 onward	TTPPC is a permanent Committee. Once they have adopted the Plan their ongoing role includes monitoring implementation and the need for any amendments, and undertaking amendments and reviews, or ensuring these are undertaken, as required.
Appeals and Mediation Te Tai o Poutini Plan	Oct-25	April 2024	Indicative time only.
Environment or High Court [Fast Track Process]	2026	2024-2025	Indicative time only.



## Te Tai o Poutini PLAN

A combined district plan for the West Coast