

Notice of appeal to Environment Court against decision on proposed policy statement or plan or change or variation

To The Registrar
Environment Court
Christchurch

Birchfield Coal Mines Ltd (BCML) appeal against a decision of the Te Tai O Poutini Plan Committee on the following Plan:

- Te Tai O Poutini Plan (TTPP)

BCML made a submission on that Plan.

BCML are not a trade competitor for the purposes of [section 308D](#) of the Act.

BCML received notice of the decision on 10 October 2025

The decision was made by the Te Tai O Poutini Plan Committee.

The decision that BCML is appealing against is:

- The Te Tai O Poutini Plan in its entirety, in order to seek this Plan to be more enabling for mineral prospecting, exploration and extraction (including ancillary activities) across the Buller, Grey and Westland Districts.
- Without limiting the above, this appeal specifically addresses the following Parts of the notified TTPP decisions:

Part 1

- General Approach
 - Information to be submitted with resource consents:
- Relationships between spatial layers
 - Rural Zone Descriptions
 - Open Space and Recreation Zone Descriptions
 - Natural Open Space Zone
 - Open Space Zone
 - Overlays
- Definitions
 - Area of Significant Indigenous Biodiversity
 - Ancillary Activity
 - Biodiversity Compensation

- Biodiversity Offset
- Ecological District
- Effects Mitigation Hierarchy
- Energy Activity
- Existing Use Rights
- Functional Need
- Indigenous Biodiversity
- Industrial Activity
- Land Based Primary Production
- Lawfully Established
- Mineral
- Mineral Extraction
- Net Gain
- Open Space Management Plan
- Operational Need
- Primary Production
- Reverse Sensitivity
- Significant Natural Area
- Threatened Environments Classification
- Threatened or At Risk / Threatened At Risk (Declining)
- Wetland
- National Direction Instruments
 - National Policy Statements and New Zealand Coastal Policy Statement
 - National Environmental Standards

Part 2

- Strategic Objectives
 - Land Based Primary Production
 - Climate Change and Resilience
 - Mineral Extraction
 - Natural Environment

- Energy, Infrastructure and Transport
- Hazards and Risks
- Historical & Cultural Values
- Natural Environment Values
 - Eco-systems and Biodiversity
 - Natural Character and Margins of Waterbodies.
 - Natural Features and Landscapes
- General District Wide Matters
 - Coastal Environment
 - Earthworks

Part 3

- Zones
 - Industrial Zone
 - Open Space and Recreation Zone
 - Natural Open Space Zone (**NOSZ**)
 - Open Space Zone (**OS**)
 - Rural Zones
 - General Rural Zone
 - Rural Lifestyle Zone
 - Mineral Extraction Zone (**MINZ**)

Part 4

- Schedules
 - Schedule Four: Significant Natural Areas
 - Schedule Five: Outstanding Natural Landscapes
 - Schedule Nine: Lawfully Established Mineral Extraction and Processing Areas.
 - Appendix Seven: Mineral Extraction Management Plan Requirements
 - Appendix Thirteen: Principles and Process for Significant Natural Area Identification
 - Appendix Fourteen: Principles and Processes for Biodiversity Offsetting
 - Appendix Fifteen: Principles and Processes for Biodiversity Compensation

- Maps

The reasons for the appeal are as follows:

Birchfield Coal Mines Limited (Birchfield Coal) is a family owned and operated coal mining company based on the West Coast. Birchfield Coal owns and operates three active opencast coal mines - Giles Creek, Strongman and Strongman East. Island Block Mine is currently under development with production planned to re-commence in 2026.

In addition to these coal mining operations, Birchfield Coal owns and operates a number of coal handling and distribution sites around the West Coast in Reefton, Mai Mai, Ikamatua, Kaiata and Rapahoe.

Birchfield Coal also operates two alluvial gold mines within the West Coast Region.

The variety in coal mined from Birchfield Coal operations mean the submitters can produce a variety of different blends that are suitable for a wide range of use. The company supplies coal to the South Island domestic market. This consists of hospitals, schools, dairy factories, swimming pools, aged care facilities and numerous smaller horticultural businesses meaning the business is an important contributor in ensuring businesses in various industries across the South Island can operate. Replacing the energy generated as a result of the coal mined by Birchfield Coal would not be a simple or inexpensive task for current customers.

Birchfield Coal is of regional and South Island importance given the dependence that a number of industries and individuals have on this steady supply of quality coal. It is of regional importance as an employer, contributing significantly to the economic and social wellbeing of its over 100 staff across the region.

Coal mining and gold mining commenced in the West Coast in the 1840s and 1864 respectively. They were, and continue to be, key industries in the development and culture of the West Coast communities.

Birchfield Coal are working with the New Zealand Institute for Minerals to Materials Research to develop alternative uses for coal, which result in no CO2 emissions and would extend the demand for coal products beyond any proposed phase out of coal use by the New Zealand Government. This demonstrates that the importance of coal mining to the West Coast region (and further afield) will endure, and must be provided for in any regulatory documents affecting development in the region.

The TTPP Decisions (**Decisions**) do not provide adequate context and provision for the importance of mineral prospecting, exploration and extraction to the social, cultural and economic wellbeing of the people and communities of the West Coast, including:

- The Decisions do not provide for Minerals Extraction and ancillary activities to occur across all relevant zones.
- The notified decisions fail to take into account the existence of mineral extraction (including mineral prospecting and mineral exploration) across the NOSZ and OSZ.
- There are errors within the NOSZ that has seen private land included in this zone.
- The original intent (and subsequently extent) of the Mineral Extraction Zone has not followed through the Plan process resulting in:

- The MINZ acting as a 'sinking lid' for mineral prospecting, exploration and extraction on the West Coast.
- This will constrain the development of the minerals industry on the West Coast.
- This will be particularly problematic for the re-consenting of existing mineral extraction activities.
- Parts of the Plan as notified that were designed to deal with these matters have been removed from the Decisions. This appeal seeks to reinstate those provisions.
- The West Coast Regional Policy Statement (**WCRPS**) has not been amended in line with national direction and higher order documents. The TTPP, in giving effect to and referencing parts of the WCRPS, has been developed in line with an outdated policy statement
- The intent of the Plan was to provide an enabling framework for economic development while balancing environmental protections.
- The following higher order documents have been subject to amendment during the course of the Plan development:
 - National Policy Statement for Indigenous Biodiversity
 - National Policy Statement for Freshwater Management
 - National Environmental Standards for Freshwater
- The continuation of the Plan process while significant legislative reform has been signalled as imminent exposes all parties to unnecessary time and cost given the knowledge that the Plan will require immediate amendment.
- The decisions contain parts of unnecessary duplication and unreasonable application of national policy statements (and their definitions), management plans and regulations. For example, the effects management hierarchy (and associated Biodiversity Offsetting and Compensation) has been defined and generally applies throughout the TTPP (for example, Light-O2, and ECO-R10), whereas in the NPS-IB its application is specific to areas mapped as Significant Natural Areas. Offsetting and compensation have also been used generally in the West Coast Regional Policy Statement (**WCRPS**) (within policy and without reference to the NPS-IB) so by implication the TTPP creates additional restriction not anticipated by the NPS-IB and WCRPS which seeks that SNA are mapped (Policy 7.1, Appendix 1).
- The Plan in its current form inappropriately includes matters of regional council jurisdiction (for e.g. greenhouse gas emissions and regionally mapped wetlands).
- The Plan in its current form does not assist the Councils in carrying out their statutory functions under the Resource Management Act (the **Act**), fails to give effect to the higher order documents or meet the requirements of section 32 and 32AA of the Act (in that the proposed policies and rules are not the most appropriate method for achieving the Act's purpose nor are they the most efficient and effective means for achieving the objectives).
- The Plan does not promote the sustainable management purpose or accord with Part 2 of the Act.

BCML seek the following relief:

- The TTPP is amended to reflect the issues raised in the BCML's submission and further submissions, and in this appeal.
- The TTPP is amended to include provisions that enable, and provide a consenting pathway for, mineral prospecting, exploration, extraction and ancillary activities through changes to the Parts listed within this appeal notice generally, and including specifically as proposed in the attached schedule.
- The TTPP is amended to ensure all land owned and occupied by BCML is able to be used for mineral extraction, ancillary and associated activities and is not unnecessarily restricted by unreasonable overlays, zones (for e.g. NOSZ) and provisions.
- The intent and extent of the Mineral Extraction Zone as notified is reinstated and retained.
- Mapping errors and general inconsistencies are rectified.
- The TTPP is consistent with relevant higher order documents.
- Any such additional, alternative or consequential relief considered necessary or appropriate to address the issues and concerns raised above, or in the BCML's submission and further submission, and in this appeal.

We attach the following documents to this notice:

- (a) A copy of Birchfield Coal's submission and further submission (with a copy of the submission opposed or supported by my further submission): and
- (b) a copy of the relevant parts of the decision.

The following persons will be served with a copy of this notice: the TTPP Committee, and every person who submitted on BCML's submission, and who BCML further submitted on.

BCML sees merit in and is willing to attend mediation/s on this appeal.

24 November 2025



On behalf of Birchfield Coal Mines Limited

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Birchfield Coal Mines Ltd - Te Tai O Poutini Plan Specific Relief Sought (in addition to the general relief sought in the Notice of Appeal)

Part	Section	Page	Relief Sought	Reasons
1	Relationships between spatial layers - Rural Zone Descriptions	2	Areas used predominantly for primary production activities, including intensive indoor primary production, <u>mineral extraction and associated activities</u> . The zone may also be used for a range of activities that support primary production activities, including associated rural industry, and other activities that require a rural location, <u>including mineral stockpiling, handling and distribution</u> .	Mineral extraction occurs throughout the Rural Zones as acknowledged in the Mineral Extraction Strategic Directions, and this needs to be consistent in the TTPP throughout.
1	Relationships between spatial layers - Special Purpose Zone Descriptions - Mineral Extraction Zone	3	Locations where mineral extraction and ancillary activities are expected to be the predominant use <u>Locations throughout Te Tai Poutini / The West Coast where mineral resources are known to exist and mineral extraction has occurred, is occurring or will occur. Mineral Prospecting, Exploration, Extraction and Ancillary Activities will occur in these areas.</u>	Fuller description of the zone to reflect the importance of the industry and extent of the zone.
1	Relationships between spatial layers - Overlays - Significant Natural Areas	5	Areas of significant indigenous vegetation and significant habitats of indigenous fauna. Only some of these areas have been identified on in Schedule Four.	Description should match legal definition of SNA. The WCRPS anticipates areas identified using the criteria in Appendix 1 will be mapped in the District Plan. Until this applies the rigid requirements of the NPS-IB are not applicable.
1	Definition - Area of Significant Indigenous Biodiversity.		Delete, or amend to match legal definition of SNA.	Description should match legal definition of SNA. The WCRPS anticipates areas identified using the criteria in Appendix 1 will be mapped in the District Plan. Until this applies the

Part	Section	Page	Relief Sought	Reasons
				rigid requirements of the NPS-IB are not applicable.
1	Definitions - Ancillary Activity	3	means an activity that supports and is subsidiary to a primary activity <u>and includes mineral stockpiling, processing and transport when associated with Mineral Prospecting, Exploration and Extraction.</u>	Amended to provide clarity for activities ancillary to Mineral Prospecting, Exploration and Extraction.
1	Definitions - Biodiversity Compensation	3	Delete	Unnecessary duplication. If to be included, support using the most up to date definition from the relevant policy (NPS-IB), and it applying only to situations applicable to the NPS-IB; otherwise oppose inclusion of the definition.
1	Definitions - Biodiversity Offset	3	Delete	Unnecessary duplication. If to be included, support using the most up to date definition from the relevant policy (NPS-IB), and it applying only to situations applicable to the NPS-IB; otherwise oppose inclusion of the definition.
1	Definitions - Ecological District	6	Delete	Unnecessary duplication. If to be included, support using the most up to date definition from the relevant policy (NPS-IB), and it applying only to situations applicable to the NPS-IB; otherwise oppose inclusion of the definition.
1	Definitions - Effects Management Hierarchy	6	Delete	Unnecessary duplication. If to be included, support using the most up to

Part	Section	Page	Relief Sought	Reasons
				date definition from the relevant policy (NPS-IB), and it applying only to situations applicable to the NPS-IB; otherwise oppose inclusion of the definition.
1	Definitions - Effects Management Hierarchy	6	Delete	Unnecessary duplication. If to be included, support using the most up to date definition from the relevant policy (NPS-IB), and it applying only to situations applicable to the NPS-IB; otherwise oppose inclusion of the definition.
1	Definition - Energy Activity	6	means the use of land (<u>including mineral extraction where that mineral is used for energy generation</u>), buildings and structures for the purpose of energy investigation, generation, transmission and distribution. This includes all types of renewable electricity generation.	Amended to include recognition that mineral extracted on the West Coast is used for energy generation.
1	Definition - <u>Existing Use Rights</u>	6, 7	<u>means a use of land that was lawfully established before the relevant rule in Te Tai o Poutini Plan becomes operative where:</u> <u>a. the effects of the use are similar in character, intensity and scale; and</u> <u>b. the use has not been discontinued for a continuous period of more than 12 month</u>	BCML is seeking the re-instatement of this Definition in line with other appeal points that will be set out.
1	Definitions - Indigenous Biodiversity	9	Delete	Unnecessary duplication. If to be included, support using the most up to date definition from the relevant policy (NPS-IB), and it applying only to situations applicable to the NPS-IB; otherwise oppose inclusion of the definition.

Part	Section	Page	Relief Sought	Reasons
1	Definitions - Land Based Primary Production	11	means production from agricultural, pastoral, horticultural, or forestry activities that is reliant on the soil resource of the land.	Definition inconsistent with Primary Production which specifically includes mining and quarrying activities. All references and definition of Land Based Primary Production to be deleted from the TTPP and replaced with Primary Production.
1	Definitions - Lawfully Established	11	means buildings, structures and activities provided for by one of the following: 1. permitted through a rule in a plan, or 2. a resource consent, or 3. a national environmental standard, or 4. a designation; or 5. or by an existing use right (as provided for in Section 10 of the RMA). , or 6. In the case of mineral extraction it also includes an activity permitted at the date that this Plan was notified through a Coal Mining Licence or an Ancillary Coal Mining Licence issued under the Coal Mines Act (1979); and does not include where the resource consent or license has either expired or lapsed.	Amend
1	Definitions - Net Gain	14	Delete	Unnecessary duplication. If to be included, support using the most up to date definition from the relevant policy (NPS-IB), and it applying only to situations applicable to the NPS-IB; otherwise oppose inclusion of the definition.
1	Definitions - Open Space Management Plan	16	means a Reserve Management Plan or Conservation Management Plan or Conservation Management Strategy or National Park Management Plan or Iwi/Papatipu Rūnanga Management Plan or other Management Plan prepared in accordance with the Reserves Act 1977 or the Conservation Act 1987.	Unnecessary duplication of regulation.

Part	Section	Page	Relief Sought	Reasons
1	Definitions - Significant Natural Area	21	means a. any area that, after the commencement date (4 August 2023), is notified or included in a district plan as an SNA following an assessment of the area in accordance with Appendix 1 of the National Policy Statement for <i>Indigenous Biodiversity 2023</i> ; and b. any area that, on the commencement date (4 August 2023), is already identified in a policy statement or plan as an area of significant indigenous vegetation significant habitat of indigenous fauna (regardless of how it is described); in which case it remains as an SNA unless or until a suitably qualified ecologist engaged by the relevant local authority determines that it is not an area of significant indigenous vegetation or significant habitat of indigenous fauna.	Support using the most up to date definition from the relevant policy (NPS-IB), and it applying only to situations applicable to the NPS-IB; otherwise oppose inclusion of the definition.
1	Definitions - Threatened Environments Classification	23	Delete or amend	This is an importation from the WCRPS and it is unclear how it is consistent with the most up to date references in the NPS-IB. Support using the most up to date definition from the relevant policy (NPS-IB), and it applying only to situations applicable to the NPS-IB; otherwise oppose inclusion of the definition.
1	Definitions - Threatened or At Risk / Threatened or At Risk (Declining)	23	Delete	Support using the most up to date definition from the relevant policy (NPS-IB), and it applying only to situations applicable to the NPS-IB; otherwise oppose inclusion of the definition.
1	Definitions - Wetland	24	has the same meaning as in section 2 of the RMA (as set out below) includes permanently or intermittently wet areas, shallow water, and land water margins that support a natural ecosystem of plants and animals that are adapted to wet conditions <u>and</u> <u>excludes areas of pasture where water ponds after rain.</u>	Amend to be consistent with the definition of Wetland in the West Coast Regional Land and Water Plan.

Part	Section	Page	Relief Sought	Reasons
1	National Policy Statements and New Zealand Coastal Policy Statement	1	The higher order documents listed in this section should be the most relevant or up to date versions that apply at the time of an Environment Court decision.	
1	National Environmental Standards	1	Delete	Suggest deleting as duplication. Not necessary.
1	Regulations	1	Delete	Suggest deleting as duplication. Not necessary.
2	Strategic Direction	1	Amend to reinstate the words which required all the objectives and policies to be read in a manner consistent with the strategic directions, and amend 2. Alignment with the communities' aspirations for development while maintaining and enhancing managing environmental quality across the Te Tai o Poutini/the West Coast;	
			6. Enabling the use and development of natural and physical resources whilst protecting managing the natural, cultural and heritage values that have been elevated to matters of national importance by the Resource Management Act 1991 and those matters of national and regional significance by National and Regional Policy Statements;	
			<u>14 Recognise and provide for the continuation of existing mineral extraction activities authorised by historic permissions, while not inappropriately restricting the development of the wider minerals industry within Te Tai O Poutini / the West Coast.</u>	
2	Land Based Primary Production Strategic Objectives	1	Amend to refer to Primary Production and not "land based primary production".	

Part	Section	Page	Relief Sought	Reasons
2	Climate Change and Resilience	1	CCR - O2 Greenhouse gas emissions are reduced and opportunities to transition to a low carbon emission economy are provided, including as a result of new technology.	Regional Council function. Delete and replace. Reduction in GHG emissions will add complexity to coal related resource consent applications - including for heating device and air discharge consents. Access to local energy sources needs to be maintained for local industries. The importation of energy from outside the region / country should be avoided.
			<u>CCR - O2 Support industrial users of energy within Te Tai O Poutini / the West Coast to have access to local energy sources to ensure energy security and continuity of supply.</u>	To be used to ensure that industries continue to maintain energy security.
		1	CCR - P5 Support, at a local level, reduction in emissions of greenhouse gases, including through providing for low carbon transport options such as walking, cycling and electric vehicles.	There needs to be a consideration of economic viability of alternative energy sources and GHG emission reductions before this is imposed on local industries.
2	Mineral Extraction	1	MIN - O1 Support tThe use and development of Te Tai o Poutini/the West Coast's mineral resources while <u>also avoiding duplication of regulation across agencies and</u> managing adverse effects on the environment.	
			<u>MIN - O2 To enable mineral extraction and ancillary activities which support it, including specifically within the Buller Coalfield Zone, Mineral Extraction Zone, Rural Zones and Natural Open Space and Open Space Zones.</u>	MIN-O2 - O6 seek the reinstatement of the Mineral Extraction Objectives (and no policies). Notified version contains appropriate enablement of mining in the West Coast districts.
			<u>MIN - O3 To recognise that mineral resources are widespread and fixed in location throughout the West Coast/Te Tai o Poutini and that provided</u>	

Part	Section	Page	Relief Sought	Reasons
			<u>adverse effects are managed, mineral extraction activities can be appropriate in a range of locations outside specified zones and precincts.</u>	
			<u>MIN - O4 To ensure that new subdivision, use and development does not compromise existing mineral extraction activities, including through reverse sensitivity to effects such as dust, noise and traffic generation.</u>	
			<u>MIN - O5 To support Poutini Ngāi Tahu to manage their pounamu and aotea stone resources through the use of Pounamu and Aotea Management Area Overlays.</u>	
			<u>MIN - O6 To: a. Avoid, remedy or mitigate the adverse effects of mineral extraction activities on the West Coast/Te Tai o Poutini's significant natural and cultural features, sites and heritage, and amenity values, including: i. Poutini Ngāi Tahu cultural resources and taonga including sites and areas of significant to Māori identified in Schedule Three; ii. Areas of significant indigenous vegetation, significant indigenous fauna habitat and protected native fauna; iii. Outstanding natural landscapes and features; iv. Waterways and waterbodies; v. The coastal environment; vi. The wellbeing of people and communities; and b. Allow adverse effects to be addressed by alternative mitigation measures such as biodiversity offsetting and environmental compensation</u>	MIN-O6 needs to specifically include provision for offsetting and compensation (generally, not just biodiversity offsetting and biodiversity compensation as defined).
			<u>MIN - P1 Enable mineral extraction and ancillary activities which support it, specifically through a Buller Coalfield Zone, and Mineral Extraction Zone, and provide for these activities in appropriate locations within the Rural Zones, and Open Space Zones and Natural Open Space Zones.</u>	Amend to ensure Natural Open Space Zone is explicitly included (not just implicitly).
2	Natural Environment	1	Delete NENV-O1, O2, P1 and P2 and reinstate NENV-O1-O4 as notified.	Primary relief, alternatively make amendments as per below.
			NENV-O1 - reinstate as notified.	

Part	Section	Page	Relief Sought	Reasons
			<u>NENV - O3 Recognise and provide for a wide range of activities to occur throughout Te Tai O Poutini / the West Coast.</u>	
			<u>NENV-P2 In relation to the natural environment recognise: Mineral Prospecting, Exploration and Extraction and Quarrying occurs throughout Te Tai O Poutini / the West Coast including within areas of high conservation value and that these activities are not mutually exclusive.</u>	f.
2	Energy	4	ENG - P11 Discourage the development of non-renewable electricity generation activities.	Inappropriate in the West Coast context. Large focus on only renewables while other energy sources are not considered or given weight. Need for the West Coast to increase energy resilience due to isolation and need to be self reliant.
		7	ENG - R9 Temporary Energy Activities Activity Status Permitted ... or 4. The temporary energy activity is a back-up generator, provided this equipment is: i. Being tested and maintained for a period not exceeding 48 hours in duration; or ii. To provide back-up electricity during routine or scheduled maintenance for a period not exceeding 48 hours; or for longer than 48 hours where that use complies with the noise limits specified between 0700 hours and 2200 hours relevant to the underlying zone; or iii. For emergency purposes only and operates for a maximum of 12 months.	Mineral extraction activities rely on the use of back up generators. Adding an unnecessary layer of regulation. Remove standards to ensure this activity is permitted.
		10	ENG - R21 Non-renewable Electricity Generation Activities Activity Status Non-complying Discretionary	Amend as more appropriate activity status.
2	Infrastructure	6	INF - R11 Back-up Generators	Delete as per above (ENG-R9)

Part	Section	Page	Relief Sought	Reasons
2	Transport	1	Overlay Chapters - The Overlay Chapters have provisions in relation to Sites and Areas of Significance to Māori; Historic Heritage; Ecosystems and Indigenous Biodiversity; Natural Features and Landscape; Natural Character and Margins of Waterbodies; Natural Hazards; <u>Mineral Extraction Zone</u> ; and the Coastal Environment. Where a transport activity is located within an overlay area (as identified in the planning maps) then the relevant overlay provisions apply	Add mineral extraction zone. Transport is an ancillary activity to most / all mineral extraction activities.
2	Hazardous Substances	1	Workplace controls over Hazardous Substances are applied via the Health and Safety at Work (Hazardous Substances) Regulations 2016. The overview section of this Part should be amended to provide updated guidance.	
2	Historic Heritage	3	HH - P6 When considering proposals for relocation or repositioning of historic heritage items identified in Schedule One, the following matters shall be considered: <p style="text-align: right;">h. Functional need and operational need of regionally significant infrastructure <u>and mineral extraction activities</u>, where there is no practicable alternative location and heritage values of the item are maintained.</p>	
		8	HH - M4 Detailed documentation of historic heritage values of items, areas and archaeological sites listed in Schedule One will be undertaken by the end of 2026. The record of these assessments will be placed on the Te Tai o Poutini Plan website and directly linked to Schedule One. Priorities for assessment are as follows: 1. Those items and areas which are on private land or are privately owned. 2. Items and areas on Crown land outside of the public conservation estate. 3. Items and areas on district or regional council lands.	Justification for Schedule 1 listings need to occur as part of the plan change process, not subsequently.

Part	Section	Page	Relief Sought	Reasons
2	Ecosystems and Indigenous Biodiversity	1	Birchfield Coal acknowledges the importance of indigenous biodiversity, but also recognises that presence of indigenous vegetation does not automatically denote the presence of 'indigenous biodiversity', and certainly not significant indigenous biodiversity. A balance needs to be struck that does not prevent people clearing low-quality vegetation, or prevent activities that will benefit communities - such as , and we understand the government is seeking to make further changes in this area. As such, we consider that all provisions in this chapter should be reconsidered against any new legislation/policy, which is expected to be provided prior to appeals reaching hearing stage.	
		2	WCRPS Reference to Appendix 1 needs to be amended or deleted. The intention is for these areas to be mapped, and not for the Appendix 1 criteria to be wholesale adopted in district council plans.	
		2	Te Mana o te Taiao - Aotearoa New Zealand Biodiversity Strategy 2020 reference deleted.	If any reference is required, the NPS-IB is more appropriate.
		3	Other relevant TTPP Provisions <u>Mineral Extraction Zone</u>	MINZ to be added to this section to recognise and provide for relationship and need for mineral extraction and its effects on Ecosystems and Indigenous Biodiversity.
		3	Retain Objectives as they were notified in the TTPP (with the exception of new ECO-P11).	Primary relief, for reason of duplication of the NPS-IB without local application which is the intent of the TTPP process.
			New Objective sought to give effect to NENV-O3 "when considering resource consent applications which have effects on ecosystems and indigenous biodiversity, have regard to the protection afforded to other similar ecosystems and indigenous biodiversity within public conservation land"	Primary relief

Part	Section	Page	Relief Sought	Reasons
		3	Retain Policies as they were notified in the TTPP and support recognition of offsetting and compensation after avoiding, remedying and mitigation has been applied. Seeks at least the following additions and deletions to the TTPP rules as they were notified: ECO-P2 (d) operational need to be recognised; ECO-P6 removal of the words "avoid", in (b) exclude manuka and Kanuka from indigenous cover, and delete "or disruption to ecological processes, functions or connections"; P7 add a new (h) "the functional or operational need for the activity to occur within areas of significant indigenous vegetation or significant habitats of indigenous fauna".	Primary relief. Alternative relief as set out below.
		4	ECO-P2 Provide for activities within areas of significant indigenous biodiversity where: a. This is for lawfully established activity and the adverse effects are no greater in intensity, scale or character over time than <u>allowed</u> at 4 August 2023, and do not result in the loss of ecosystem representation and extent or degradation of ecological integrity; or b. This is for maintenance of improved pasture as part of a regular cycle of periodic maintenance; or c. It is for Poutini Ngāi Tahu Activities; or d. This is undertaken on Poutini Ngāi Tahu land in accordance with an Iwi/Papatipu Rūnanga Management Plan or on specified Māori land; or e. This is for the construction or upgrade of regionally significant infrastructure.	Amendments required to ensure this would allow the continuation of existing mineral extraction activities - even if the full extent of the permission had not been used at 4 August 2023.
		4	ECO - P3 Provide for activities within Significant Natural Areas within Schedule Four where the adverse effects of the activity on the significant natural area are managed in accordance with the effects management hierarchy, the activity has a functional need or operational need to be located within the area and there is no practicable alternative location, and it is for the purpose of: a. Construction or upgrade of regionally significant infrastructure; or b. Mineral extraction	

Part	Section	Page	Relief Sought	Reasons
			<p>that provides significant national public benefit that could not otherwise be achieved using resources within New Zealand; or</p> <p>c. Aggregate extraction that provides significant national or regional public benefit that could not otherwise be achieved using resources within New Zealand.</p>	
		5	ECO-P7 - Delete	Very restrictive when considered against a mineral extraction proposal involving vegetation clearance. Effectively acts as a gateway test without any opportunity for site specific circumstances to be taken into account. Will also essentially mean that ecological assessments are required across all applications involving native vegetation clearance.
		5	ECO-P8 Protect indigenous biodiversity in the coastal environment by: b. - amend.	Amend to account for contribution mineral extraction makes regionally, and if any new legislation/policy in this area.
		6	ECO - P10 Protect indigenous biodiversity in the coastal environment by: b. Avoiding Managing adverse effects on significant indigenous biodiversity; and c. Using the effects management hierarchy to manage avoid significant adverse effects on indigenous vegetation, dunes, estuaries, coastal wetlands, habitats and species within the coastal environment	
		7	ECO - P12 To promote the resilience of indigenous biodiversity to climate change and recognise its role in mitigating the effects of climate change.	
		7,8	Primary relief is to seek to retain the rules as originally notified in the TTPP with larger permitted vegetation clearances in R1, deletion of R2 and and recognition of the functional or operational needs to activities to locate within	Primary relief. Alternative relief as set out below.

Part	Section	Page	Relief Sought	Reasons
			areas of indigenous vegetation requiring clearance (R5). Otherwise, alternative relief as set out below.	
		7, 8	ECO - R1 General Standards Permitted activities standards outside Significant Natural Areas: Reinstate previous version of ECO-R1.	Will require ecological assessments of indigenous vegetation for all mineral extraction applications. Unclear how it works in relation to other permitted activities given it is expressed as a standard. Vegetation clearances needs to be increase to 2000m2 given the extent of the coastal environment.
		10, 11	ECO - R3 Indigenous vegetation clearance for maintenance and repair of lawfully established structures and activities outside of Significant Natural Areas not provided for in Rule ECO - R1 Activity Status Permitted Where: 1. The clearance is for the maintenance and repair of lawfully established activities (including mineral extraction activities) and structures including tracks, accessways, fences, pipelines, drains, natural hazard mitigation structures, shelterbelts and woodlots, environmental monitoring facilities and infrastructure; or 2. The clearance is for the maintenance of improved pasture for farming. Advice Note: 1. In relation to standard 1 of this rule, the reference to infrastructure applies where the infrastructure is not regulated by Rule ECO - R2.	Amend to ensure this rule permits lawfully established mineral extraction activities to continue.
		11, 12	ECO - R6 Indigenous vegetation clearance outside of Significant Natural Areas not provided for in another Permitted Activity Rule Activity Status Permitted 12. For mineral prospecting, exploration, extraction and ancillary extraction or prospecting activities within the MINZ - Mineral Extraction Zone or BCZ - Buller Coalfield Zone;	

Part	Section	Page	Relief Sought	Reasons
		12	<p>ECO - R7 Indigenous Vegetation Clearance within a Significant Natural Area Activity Status Permitted Where this is: 1. For the maintenance, operation and repair of lawfully established activities and structures including tracks, fences, drains, structures, infrastructure and renewable electricity generation activities where: i. This is at the same or similar scale, character and intensity as <u>was authorised</u> at 14 July 2022; and ii. The clearance is within 3 metres of the lawfully established activity and is limited to a maximum area of 50m per individual Significant Natural Area; 2. Necessary to remove vegetation that endangers human life or existing buildings or structures, where this is certified by a Council Approved Contractor; 3. For the safe and efficient operation (including maintenance and repair) of any formed public road, rail corridor or access where the removal is within 3 metres of the formed width of the road, rail corridor or access where this is undertaken by a Road or Rail Controlling Authority; 4. To comply with section 43 of the Fire and Emergency Act 2017; 5. To enable removal of unwanted organisms declared under the Biosecurity Act 2015.</p>	<p>Amend to ensure this covers current mineral extraction activities.</p>
		13	<p>ECO - R9 Indigenous vegetation clearance not meeting Permitted or Controlled Activity Standards outside of a Significant Natural Area in the Grey District Activity Status Restricted Discretionary Where: 1. This is not within: i.; ii. An area of land environment of category one or two of the Threatened Environment Classification; or iii. An Outstanding Natural Landscape identified in Schedule Five; or iv. An Outstanding Natural Feature identified in Schedule Six; or v. An area of High Coastal Natural Character identified in Schedule Seven; or vi. An area of Outstanding Coastal Natural Character identified in Schedule Eight. Discretion is restricted to b. Consideration of the functional need or operational need of network utilities, renewable electricity generation, <u>mineral prospecting, exploration and extraction activities</u> and regionally significant infrastructure;</p>	<p>Inclusion of Mineral Extraction activities as part of the Restricted Discretionary rule. Higher order documents acknowledge a consent pathway for these activities, and their functional and operational needs.</p>
		14, 15	<p>ECO - R10 Indigenous vegetation clearance not meeting ECO - R5 Permitted, Controlled or Restricted Discretionary Rules Activity Status Discretionary Where: 1. An ecological</p>	<p>Use of WCRPS criteria not consistent with other parts of the plan. The rule applies the Effects Management</p>

Part	Section	Page	Relief Sought	Reasons
			assessment undertaken by a suitably qualified ecologist identifies that the indigenous vegetation clearance will not adversely affect an area of significant indigenous biodiversity using the WCRPS, Appendix 1 NPS-IB <u>assessment criteria</u> ; and ...	Hierarchy to all vegetation clearance not meeting rule, and given the references in the definition it should only apply to those clearances as provided for in the NPS-IB.
		16	ECO - R12 Indigenous vegetation clearance not meeting ECO - R10 Activity Status Non-complying <u>Discretionary</u>	Change activity status to provide a consenting pathway - still allows for protections and assessment of applications on a case by case basis.
2	Natural Character and Margins of Waterbodies	1	NC-O3 amend to include operational need	
		2	NC - P2 Provide for earthworks within riparian margins of lakes, rivers and wetlands where adverse effects on natural character are avoided, remedied or mitigated and: c. It is for the establishment, operation, maintenance or upgrading of renewable electricity generation activities, <u>mineral prospecting, exploration or extraction</u> , or regionally significant infrastructure where this has a functional or operational need to be located in a riparian margin;	Retain NC-P2 as notified in the TTPP (primary relief), or alternatively add mineral extraction provisions.
		3	NC - R1 Indigenous Vegetation Clearance and Earthworks within the Riparian Margin of a River, Lake or Wetland Activity Status Permitted Where this is outside of any Significant Natural Area identified in Schedule Four, and for: <u>xv: Mineral Prospecting, Exploration or Extraction</u>	Amended to include mineral extraction activities.
2	Natural Features and Landscapes	1	These areas may also include regionally significant infrastructure, <u>mineral extraction</u> , renewable electricity generation activities, and other elements of the built environment and have varying degrees of modification	Amended to include mineral extraction activities
		1	Other relevant TTPP Provisions <u>Mineral Extraction Zone</u>	

Part	Section	Page	Relief Sought	Reasons
		2	NFL - P2 Provide for activities within outstanding natural landscapes described in Schedule Five and outstanding natural features described in Schedule Six where they maintain the values that contribute to a natural feature or landscape being outstanding and are for: a. Existing land uses and lawfully established activities including existing residential activities, regionally significant infrastructure, network utilities, energyrenewable electricity generation activities, mineral extraction, agricultural, horticultural and pastoral activities;	Amend to include Mineral extraction and/or primary production (which includes mining) needs to be referenced within this Policy. Should also be referenced in Overview.
		2	NFL - P2 (now NFL-P3) - Retain as it was notified in the TTPP	Significant adverse effects should be specified. Offsetting and compensation need to be an option
		2	NFL - P4 - amend to include mineral extraction, exploration and prospecting'	Policy supported but needs to include reference to mining activities.
		7	NFL - R11 Mineral Extraction in the Buller Coalfield Zone and Mineral Extraction Zone, <u>General Rural Zone, Open Space and Natural Open Space</u> within an Outstanding Natural Landscape described in Schedule Five .Activity Status Restricted Discretionary Where: 1. These are on land within the Buller Coalfield Zone or a Mineral Extraction Zone, <u>General Rural Zone, Open Space and Natural Open Space</u> and 2. This includes earthworks and buildings associated with the activity. Discretion is restricted to: a. Any requirements for landscape evaluation; b. Managing adverse effects on historical, cultural, and biodiversity values; c. Amenity and visual effects; d. Managing effects on public access and natural character; e. Effects on the values that make the feature or landscape Outstanding; f. Identifying and avoiding adverse effects on Poutini Ngāi Tahu values;	Support rule, but earthworks for mineral extraction outside of MINZ should also be provided for as a restricted discretionary activity.

Part	Section	Page	Relief Sought	Reasons
			g. Extent and design of earthworks; and h. Mitigation measures for landscape effects.	
2	Coastal Environment	9	CE - R11 Earthworks in the Outstanding Coastal Environment	Amend to include mineral extraction.
		12	CE - R18, R16 Earthworks within the Outstanding Coastal Environment Area not provided for as meeting Permitted Activity standards	Amend to include mineral extraction.
2	Earthworks	1	Amendments to ensure it is clear that the earthworks chapter does not apply to mineral extraction, exploration, prospecting and ancillary activities in any zone. Ensure Chapter and provisions are amended as necessary to make this clear.	
			Earthworks Associated with Mineral Extraction - the Zone and Overlay Chapters have provisions which manage mineral extraction and its ancillary activities. The earthwork rules within this chapter do not apply to mineral extraction, mineral prospecting or mineral exploration <u>or ancillary activities.</u>	
			EW - R1 Earthworks General Standards All Permitted activities must comply with the following relevant standards g. Rule EW - R1 does not apply to earthworks associated with mineral extraction, mineral exploration, or mineral prospecting.	
			EW - R2 Earthworks - All Zones Activity Status Permitted Rule EW - R2 does not apply to earthworks associated with mineral extraction, mineral exploration, or mineral prospecting.	a.
			EW - R3 Earthworks in the GRUZ - General Rural Zone, RLZ - Rural Lifestyle Zone, any INZ - Industrial Zone, FUZ - Future Urban Zone, AIRPZ - Airport Zone, any OSRZ - Open Space and Recreation Zone and the MPZ - Māori Purpose Zone	

Part	Section	Page	Relief Sought	Reasons
			5. Rule EW - R3 does not apply to earthworks associated with mineral extraction, mineral exploration, or mineral prospecting.	
			EW - R4 Earthworks in any RESZ - Residential Zone, the NCZ - Neighbourhood Centre Zone or SETZ - Settlement Zone a. Rule EW - R4 does not apply to earthworks associated with mineral extraction, mineral exploration or mineral prospecting.	
3	Open Space and Recreation Zones	1	<u>The Open Space and Recreation Zone supports a range of Mineral Prospecting, Exploration and Extraction activities. The ability of the people and communities of the West Coast to continue to use this land to generate income is important to the ongoing provision of their social, cultural and economic wellbeing.</u>	Amend to recognise the importance of the OSRZ to the people and communities of the West Coast, including through mineral extraction activities. Mineral extraction frequently occurs in OSRZs and a consenting pathway should be provided for this.
		1	the Department of Conservation is exempt under the Resource Management Act from being required to meet these on land it administers	Incorrect
		1	The lands zoned Open Space and Recreation Zones are also governed by specific legislation such as the Reserves Act, the National Parks Act and Conservation Act. Many matters that impact on resource management are governed through these Acts, and through the Management Plans that are required by these Acts. As a consequence, the Objectives, Policies and Rules provide for a linkage to the Reserve National Park and other types of Open Space Management plans that are in place for these areas under their governing legislation. As these Open Space Management Plans must be prepared through a consultative process with affected communities, the aim of the approach of referring to them within Te Tai o Poutini Plan provisions is to reduce the duplication of provisions and regulation of activities within these areas. Where no Open Space Management Plan is in place, a full regulatory pathway is provided for within Te Tai o Poutini Plan. Land included within the Open Space and Recreation Zones adjoins a number of other	Remove to avoid duplication of regulation.

Part	Section	Page	Relief Sought	Reasons
			territorial authority boundaries not managed by Te Tai o Poutini Plan. When considering activities close to territorial authority boundaries, plan users need to apply care with regard to managing any potential cross boundary resource management issues.	
		MAP	Remove NOSZ from private land at Giles Creek, including Section 9-11 Block V Reefton Survey District, and rezone as MINZ and to provide for Mineral Extraction.	
		1	The NOSZ - Natural Open Space Zone is where the Plan recognises and provides for open spaces that contain high natural and ecological values. The Zone is made up of the most ecologically significant open space and reserves where natural values predominate such as National Parks, Nature Reserves, Scientific Reserves, Wilderness Areas and Specially Protected Areas as well as other areas of public conservation land identified with very high natural values. A low level of development and built form is anticipated within this zone to retain the natural/biodiversity values within natural open space areas. <u>The nature of the West Coast, with its extensive mineral deposits, means that minerals are widespread within areas in the Natural Open Space Zone. There are a range of circumstances where some mineral extraction may be appropriate, particularly where this supports ongoing access and management of the lands within the zone. . This means that provision is also made for mineral extraction within the Natural Open Space Zone</u>	
		2	OSRZ - O1 To recognise the different functions, values and purpose of open space on Te Tai o Poutini/the West Coast through providing for three Open Space and Recreation Zones: a. The NOSZ - Natural Open Space Zone with high natural values and a low level of development and built form <u>while providing for appropriate mineral extraction activities.</u>	Amend to include mineral extraction.
			Amend to include mineral extraction policies like those for the Rural Zones.	

Part	Section	Page	Relief Sought	Reasons
			<p>OSRZ - P1 Open space should be developed and used in accordance with any relevant operative Reserves Act or Conservation Act Management Plan.</p>	<p>Duplication of regulation.</p>
			<p>OSRZ - P2 Open space may accommodate recreational, cultural, natural, heritage, access and amenity values and functions and ancillary activities to support these, including <u>mineral extraction</u>, electricity transmission, distribution and renewable electricity generation where this fits with the purpose of the open space and its classification under any relevant Act.</p>	
			<p>OSRZ - P15 Provide for Mineral Extraction, Mineral Prospecting and Mineral Exploration activities within the OSZ - Open Space Zone where:</p> <ul style="list-style-type: none"> a. Adverse effects on open space and recreation values and the environment are managed; b. Sites are rehabilitated when mineral extraction activities cease to enable future land uses and activities appropriate to the area; c. Areas and values identified in Schedules One to Eight and the Overlay Chapters are protected; d. Significant ecological values are protected and indigenous biodiversity is maintained. 	<p>Delete and retain the rule as notified in the TTPP, but include references to mineral extraction, mineral prospecting and mineral exploration activities.</p>
			<p>OSRZ - P22 Provide for Mineral Extraction, Mineral Prospecting and Mineral Exploration activities within the NOSZ - Natural Open Space Zone where:</p> <ul style="list-style-type: none"> a. Adverse effects on open space and recreation values and the environment are managed; b. Sites are rehabilitated when mineral extraction activities cease to enable future land uses and activities appropriate to the area; c. Areas and values identified in Schedules One to Eight and the Overlay Chapters are protected; d. Significant ecological values are protected and indigenous biodiversity is maintained. 	<p>Delete and retain the rule as notified in the TTPP, but include references to mineral extraction, mineral prospecting and mineral exploration activities.</p>

Part	Section	Page	Relief Sought	Reasons
3	Natural Open Space Zone	1	Amend to include provisions that enable mineral extraction / quarrying within this zone. Protections to high value conservation land are provided via Schedule 4 of the Crown Minerals Act.	
		5	NOSZ - R18 Mineral Prospecting, Mineral Exploration and Mineral Extraction Activities Activity Status Non-complying Discretionary	Amend activity status to provide consent pathway.
3	Open Space Zone	1	Amend to include provisions that enable mineral extraction / quarrying within this zone. Protections to high value conservation land are provided via Schedule 4 of the Crown Minerals Act.	
		4, 5	OSZ - R10 Delete and retain rule as notified in the TTPP	
3	Rural Zones	1	Because the Rural areas represent such a large part of Te Tai o Poutini/the West Coast, in addition to the RURZ - Rural Zones Objectives and Policies the Strategic Objectives also provide particularly relevant considerations for the management of these areas.	
		5	RURZ - P23 Require proposals for new mineral extraction activities to provide adequate information on the: a. The establishment and operation of the mineral extraction activity to enable an assessment of environmental effects; b. Measures to avoid, remedy or mitigate adverse effects; and rehabilitation c. Rehabilitation of the mineral extraction area to the condition prior to the activity occurring when mineral extraction activity ceases.	Duplication of Schedule Four of the RMA that sets out the information required to be submitted with resource consent applications and AEE's. Further guidance unnecessary.
3	General Rural Zone Rules	1	Amendments required to enable consent pathway for mineral prospecting, exploration and extraction and ancillary activities.	Mineral activities frequently occur in the rural zone and must occur where the mineral resource is. Enable consenting pathway.

Part	Section	Page	Relief Sought	Reasons
			Overview could be bolstered by more information to demonstrate the importance of the minerals sector.	Mineral activities frequently occur in the rural zone and must occur where the mineral resource is. Enable consenting pathway.
			GRUZ - R11 Mineral Extraction PA Rule: Revert non-compliance activity status to as notified: Controlled where this is a previously mined area ... Otherwise Restricted Discretionary.	Better gives effect to RURZ objective and policies. Enables consenting pathway sought.
			GRUZ - R17 Mineral Extraction and Mineral Prospecting and Mineral Exploration not meeting Permitted Activity standards - Revert to notified (GRUZ - R18 and GRUZ-25) Restricted Discretionary Rule	Better gives effect to RURZ objective and policies. Enables consenting pathway sought.
3	Mineral Extraction Zone		Primary relief - amend the MINZ and all its provisions to restore what was initially included in the Proposed TTPP.	MINZ specifically set up to enable mineral extraction, decisions version does not enable mineral extraction.
			The MINZ - Mineral Extraction Zone covers areas where there are discrete, long term mineral extraction activities, which enables management of associated effects, including reverse sensitivity effects. Areas in the zone include minerals that are currently authorised. support climate change adaptation and transition to a low emissions economy. This authorisation is from three different mechanisms and includes: 1. Coal mining licences under the Coal Mines Act (1979); 2. Ancillary coal mining licences under the Coal Mines Act (1979); and 3. Resource consents issued under the Resource Management Act (1991).	Retain pre notification decision wording. MINZ specifically set up to enable mineral extraction, decisions version does not enable mineral extraction.
			MINZ - P1 To identify and provide for significant mineral resources (where these are found in a discrete location) by identifying MINZ - Mineral Extraction Zones and applying provisions to facilitate discrete, long term mineral extraction activities. To provide for the existing lawfully established mineral extraction and processing activities	MINZ specifically set up to enable mineral extraction, decisions version does not enable mineral extraction.

Part	Section	Page	Relief Sought	Reasons
			<p><u>in the MIN-Mineral Extraction Zone and the opportunities for reasonable growth and expansion to meet future demands, while managing adverse effects on the environment.</u></p>	
			<p><u>MINZ - R2 Mineral Extraction and Processing Activity Status Permitted Where:</u></p> <ol style="list-style-type: none"> <u>1. The mineral extraction and processing are lawfully established at the date the Plan becomes operative;</u> <u>2. Where the site is active, or intended to be active within the next 12 months:</u> <ol style="list-style-type: none"> <u>a. To the extent not already required by any coal mining licence or resource consent, a Mineral Extraction Management Plan shall be prepared in accordance with the outline provided in Appendix Seven and be submitted to the relevant district council within 12 months for certification. This plan will:</u> <ol style="list-style-type: none"> <u>i. Provide an outline of the issues and values that need to be managed at the site;</u> <u>ii. Provide the detail of how these issues and values will be managed;</u> <u>iii. Set out a schedule of annual monitoring to be undertaken; and</u> <u>iv. Outline the rehabilitation and mine closure process for the site;</u> <u>b. To the extent not already required by any coal mining licence or resource consent, an annual Environmental Monitoring Report and Annual Work Plan shall be prepared and submitted to the Consent Authority by 30 March of each calendar year. These Plans will be required until the relevant district council certifies that rehabilitation is complete;</u> <u>3. During mineral extraction activity, progressive rehabilitation of all disturbed areas is undertaken in accordance with the rehabilitation programme in the Mineral Extraction Management Plan;</u> <u>4. Upon ceasing of mineral extraction and processing activity, a programme of mine closure shall be undertaken in accordance with the mine closure programme in the Mineral Extraction Management Plan;</u> <u>5. No blasting or vibration shall occur outside the hours of 0700 to 2200 hours weekdays and 0800 to 1800 hours on weekends and public</u> 	<p>Inclusion of MIN-R2 as notified, including controlled non-compliance activity status. MINZ specifically set up to enable mineral extraction, decisions version does not enable mineral extraction.</p>

Part	Section	Page	Relief Sought	Reasons
			<p><u>holidays;</u></p> <p><u>6. A bond is in place with the relevant district council;</u></p> <p><u>7. Noise meets the Permitted Activity Standards in Rule NOISE - R7; and</u></p> <p><u>8. Light and glare meet the Permitted Activity standards in Rule LIGHT R4.</u></p> <p><u>Advice Note:</u></p> <p><u>1. Only active mineral extraction sites, or those expected to be active within 12 months are required to prepare a Mineral Extraction Management Plan, Annual Work Plan or Environmental Monitoring Report.</u></p> <p><u>2. Mineral Extraction within the Pounamu and Aotea Overlays is subject to Rule SASM - R7.</u></p> <p><u>3. Where an activity subject to this rule is located within an Overlay Chapter area then compliance with the relevant Overlay Chapter rules is required.</u></p> <p><u>4. The activity may require a resource consent from the West Coast Regional Council. In particular there are restrictions in relation to earthworks within 100m of a wetland and work which may affect waterbodies</u></p>	
			MINZ - R5 - Revert rule to notified version (MINZ-R6) to provide a controlled activity status for Mineral Extraction not complying with permitted activity standards.	MINZ specifically set up to enable mineral extraction, decisions version does not enable mineral extraction.
			MINZ - R6 Revert to notified version (MINZ-R7)	MINZ specifically set up to enable mineral extraction, decisions version does not enable mineral extraction.
4	Schedule Four: Significant Natural Areas	2	BLA-P002 - Mt Davey SNA - amend or remove, and ensure that the SNA if retained does not encroach into MINZ or areas occupied (via access agreements), areas of mineral permits, mining licences or related activities.	

Part	Section	Page	Relief Sought	Reasons
4	Schedule Five: Outstanding Natural Landscapes	11	ONL31 Rapahoe Range - amend or remove, and ensure that the ONL if retained does not encroach into MINZ or areas occupied (via access agreements), areas of mineral permits, mining licences or related activities.	
		12	ONL33 Victoria Range West - amend or remove, and ensure that the ONL if retained does not encroach into MINZ or areas occupied (via access agreements), areas of mineral permits, mining licences or related activities.	
		9	ONL22 Bonar, Rangitoto and Bald Hill Ranges -amend or remove, and ensure that the ONL if retained does not encroach into MINZ or areas occupied (via access agreements), areas of mineral permits, mining licences or related activities.	
4	Schedule Nine: Lawfully Established Mineral Extraction and Processing Areas		Reinstate entire Schedule.	Provisions in the plan relate to lawfully established activities. By inclusion of this schedule this avoids and assessment at consent time for those activities listed.
4	Appendix Seven: Mineral Extraction Management Plan		Remove in entirety.	Can be dealt with via consent conditions. Duplication of requirements under Schedule Four RMA.
4	Appendix Thirteen: Principles and Process for Significant Natural Area Identification		Remove in entirety.	Pause on identification made pursuant to NPS-IB amendment in 2024. Government announcements on RMA reform. WCRPS need to revise the WCRPS to ensure consistency with higher order documents.

Part	Section	Page	Relief Sought	Reasons
4	Appendix Fourteen: Principles for Biodiversity Offsetting		Remove in entirety.	Duplication. Reference to NPS-IB sufficient.
4	Appendix Fifteen: Principles for Biodiversity Compensation		Remove in entirety.	Duplication. Reference to NPS-IB sufficient.