

**FURTHER SUBMISSION IN SUPPORT OF, OR IN OPPOSITION TO, A SUBMISSION ON THE PROPOSED TE TAI O POUTINI PLAN**

**Clause 8 of Schedule 1 Resource Management Act 1991**

To: Te Tai o Poutini Plan Team  
Address: 388 Main South Road, Paroa, Greymouth 7805  
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**Further Submitter Details**

Name of further submitter: Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird).

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*The TPPP team will serve all formal documents by email. Where there is no email address provided, the documents will be posted to the postal address stated above.*

**I am:** (please tick relevant box)

- a) A person representing a relevant aspect of the public interest.   
(In this case, also specify the grounds for saying that you come within this category); or
- b) A person who has an interest in the proposal that is greater than the interest of the general public.   
(In this case, also explain the grounds for saying that you come within this category); or
- c) The local authority for the relevant area.

Please state the grounds as to why you come within the category selected above:

Forest & Bird is New Zealand's largest non-governmental conservation organization representing its members and supporters, and made a submission (S560) on the Proposed Te Tai o Poutini Plan.

**TPPP Hearing** (please tick relevant box)

Do you wish to be heard in support of your further submission? Yes  No   
If others make a similar submission would you consider presenting a joint case with them at a hearing? Yes  No

**Submission**

The submission points, support or opposition, reasons and decisions sought are set out in the attached document.

Note: Any attachments to your submission should only be supporting information, not the submission.

*[Handwritten signature]*

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17 July 2023

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Signature of the person making further submission  
or the person authorised to sign on behalf of the  
person making further submission.

.....  
Date

| Submitter (original submission)  | Submission number/point number | Support/Oppose original submission/point | Plan Section/provision | Reasons for support/Oppose   | Seek that the decision be allowed/disallowed |
|----------------------------------|--------------------------------|--|------------------------|--|--|
| West Coast Fish and Game Council | S302                           | Support                                  | All                    | <p>The amendments sought give effect to the NPS FM, the RPS and Part 2 of the RMA and the draft NPS IB.</p> <p>Forest &amp; Bird supports the full submission of Fish and Game other than where the relief sought would conflict with that sought in Forest &amp; Birds submission.</p>      | Allow  |
| Federated Farmers of New Zealand | S524                           | Oppose                                   | All                    | <p>The amendments sought will result in a loss of indigenous biodiversity values which is inconsistent with councils functions and responsibilities under section 31(1)(b)(iii) and Section 6 the RMA and do not give effect to the RPS, NPSFM and the NZCPS.</p>                            | Disallow                                     |
| Department of Conservation       | S602                           | Support                                  | All                    | <p>The amendments sought give effect to the NPS FM, the RPS and Part 2 of the RMA.</p> <p>Forest &amp; Bird supports the full submission of the Director General for Conservation other than where the relief sought would conflict with that sought in Forest &amp; Birds submission.</p>   | Allow  |
| West Coast Regional Council      | S488                           | Support                                  | All                    | <p>The amendments sought give effect to the NPSFM, the RPS and Part 2 of the RMA and the draft NPSIB.</p> <p>Forest &amp; Bird supports the full submission of the Regional Council other than where the relief sought would conflict with that sought in Forest &amp; Birds submission.</p> | Allow  |
| Grey District Council            | S608                           | Oppose                                   | All                    | <p>The amendments sought will result in a loss of indigenous biodiversity values which is inconsistent with council functions and responsibilities under the RMA section 6 and section 31(1)(b)(iii). The submission does not give effect to the RPS, NPS FM, NPSIB and the NZCPS</p>        | Disallow                                     |

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| Newcoast Resources Limited  | S191.001<br>S191.002<br>S191.003 | Oppose          | Various                                | The mineral extraction zone approach is inappropriate. New mineral extraction activities need to be restricted in other zones where other activities and/or outcomes take priority. It is appropriate to amend mineral extraction provisions as set out in Forest & Birds submission S560.  | Disallow  |
| Te Runanga o Ngai Tahu.<br>Te Runanga o Ngati Wae<br>Wae, Te Runanga o<br>Makaawhio | S620                             | Support in part | All                                    | Generally support the submission as some of the relief sought will help to protect and restore wetlands and water bodies, landscapes, the coastal environment, and indigenous biodiversity throughout Te Tai o Poutini/West Coast and help give effect to higher order documents including the NPSFM, NESF, NZCPS, NPSIB and the RMA. However, Forest & Bird is concerned to ensure that appropriate protections for the natural environment remain, while providing for tangata whenua interests. For example, we are interested in understanding the implications of the approach taken in the submission to generally provide for any activity coming under the new definition 'Poutini Ngai Tahu activity'. | Allow the relief sought, except where that conflicts with Forest & Bird's relief sought in its submission, or otherwise removes or lessens protection for natural environment values. |
| Te Tai o Poutini Plan Committee   | S171.001                         | Support in part | Outstanding Natural Landscape overlays | Forest & Bird agrees that updated information should be used to provide greater certainty as to the extent of Outstanding Natural Landscapes. In our view this should include where new information identifies an increase as well as where it identifies a decrease in land area covered by the Outstanding Natural Landscape overlays.  | Allow in part<br>Include additional ONL areas as identified in updated ONL mapping.   |

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| Te Tai o Poutini Plan Committee | S171.006                                     | Support in part | Subdivision/SUB - R21                  | Forest & Bird agree that a stronger activity classification is required to discourage or prevent subdivision where severe hazards are identified. In some areas a prohibited activity status may be appropriate.  | Allow    |
| Te Tai o Poutini Plan Committee | S171.007<br>S171.008<br>S171.009<br>S171.013 | Oppose in part  | Commercial and Mixed Use Zones,        | The submission has not set out the proposed wording for the new objectives. The decision requested refers to direction however the purpose of an objective is to set outcomes/goals not policy direction. While we generally agree that the addition to include objectives to support zoning proposed in the plan is appropriate to address an omission, new residential zones objectives and policies to support rezoning sounds additional and is uncertain without specific wording being provided. Any direction on rezoning needs to be consistent with provisions for protection of natural values and maintaining indigenous biodiversity. | Allow    |
| Te Tai o Poutini Plan Committee | S171.008                                     | Oppose in part  | Residential Zones                      | As above  | As above |
| Te Tai o Poutini Plan Committee | S171.009                                     | Oppose in part  | Residential Zones                      | As above  | As above |
| Te Tai o Poutini Plan Committee | S171.013                                     | Oppose in part  | Residential Zones                      | As above  | As above |
| Westland District Council       | S181   | Support         | All other than the points below        | The submission is generally consistent with protection and maintenance of indigenous biodiversity and is generally consistent with Forest and Birds original submission   | Allow    |
| Westland District Council       | S181.015                                     | Support         | Ecosystems and Indigenous Biodiversity | Forest and Bird generally supports the Westland District Council's submission in its commitment to undertake the required SNA review. This is consistent with the NPS-IB. The Plan should be  | Allow    |

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|   |          |                 |                              | explicit about this requirement for all West Coast Councils.   |  |
| Westland District Council                     | S181.061 | Oppose          | Designations                 | It is unclear whether the Reserve land is already designated for the Franz Josef Aerodrome. If not then a Notice of Requirement process should be followed.  | Disallow   |
| Westland District Council                     | S181.063 | Oppose          | Designations                 | Forest and Bird is unclear how effects of an activity associated with 'improvements' to the Hokitika transfer station would be managed. The effects of any improvements will need to be managed through conditions on the designation or resource consent.   | Disallow   |
| Ellis Mining Ltd                              | S146.001 | Oppose          | Planning Maps and Overlays   | The Mineral Extraction Zones in the Plan are not supported by Forest and Bird.   | Disallow   |
| New Zealand Agricultural Aviation Association | S166.003 | Oppose          | STRATEGIC DIRECTION NENV- 01 | S6(a) is not limited to "outstanding"<br>Strategic direction is not necessarily limited to s6 matters.<br>S6(c) is not set out in the context of protection from 'inappropriate subdivision use and Development'<br>Case law considers that what is/maybe 'inappropriate' is to be determined by effects on what is to be protected In any respect such wording is not appropriate to the objective. | Disallow   |
| West Coast Penguin Trust                      | S275     | Support         | ECO GRUZ                     | The submission is generally consistent with protection and maintenance of indigenous biodiversity and is generally consistent with Forest and Birds original submission.   | Allow  |
| Skyline Enterprises                           | S250     | Oppose          | ONL/ONF NOSZ                 | The submission is inconsistent with the S6 matters and the protection of outstanding natural landscapes and significant indigenous biodiversity and significant habitats for indigenous fauna.   | Disallow   |
| Transpower New Zealand Limited                | S299.017 | Support in part | SUBSTATION (ZONE)            | Forest & bird generally accepts the need for clarification. This may also require consequential  | Allow with consequential amendments to address adverse |

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|                                |          |                |  | amendments to ensure that effects of substations either within the zone provisions or under other provisions can be fully assessed with respect to effects on indigenous biodiversity and ecosystem function.   | effects of substations, including those that may be directly connected to the National Grid |
| Transpower New Zealand Limited | S299.020 | Oppose in part | Interpretation Definitions (new definition Minimise) | Agree with Transpower that the wording is “avoid, remedy or mitigate” is preferred to using the word “minimise”. However, the alternative of a definition is also uncertain. It is not clear whether the intent of provisions using the term “minimise” is to that adverse effects are minimized with respect to the matter/value adversely affected such that the effect may be acceptable or to the extent that it is feasible for the activity being proposed? What is “reasonably practical” may also need further guidance in the plan to avoid uncertainty if a definition is included. | Disallow the submission   |
| Transpower New Zealand Limited | S299.021 | oppose         | STRATEGIC DIRECTION Connections and Resilience       | Forest & Bird generally agrees that the plan should reconsider and provide for the national and regional significance of the national grid, however the specific wording is not supported. ‘Sustainable, secure and efficient’ are not the only matters on which provision should be determined. Appropriate wording in is already set out by ENG-O1.   | disallow  |
| Transpower New Zealand Limited | S299.027 | oppose         | Energy Energy  | The submission is contrary to what Forest & Bird seeks with respect to the ECO and other Natural Environment and District Wide chapters. The relief sought is inconsistent with the NZCPS and the RPS. Clarification may be improved by cross referencing Energy provisions to the ECO, CE and  | Disallow .  |

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|                                |          |                 |   | other Natural Environment and District Wide chapters  |   |
| Transpower New Zealand Limited | S299.028 | oppose          | Energy<br>Other relevant Te Tai o Poutini Plan provisions | The submission is contrary to what Forest & Bird seeks with respect to the ECO and other Natural Environment and District Wide chapters. The relief sought is inconsistent with the NZCPS and the RPS.  | Disallow  |
| Transpower New Zealand Limited | S299.039 | oppose          | Energy<br>ENG - P7  | As set out in Forest & Birds submission S650, the extent to which proposals avoid, remedy, or mitigate effects needs to be in accordance with how effects re to be address on matters set out in the Natural Environment and District Wide chapters. This is particularly important where major upgrades or new national grid infrastructure are proposed, but is also necessary for the effects of operation, maintenance, minor and other upgrades. | Disallow  |
| Transpower New Zealand Limited | S299.040 | Oppose          | Energy<br>ENG – P8  | The submission is contrary to what Forest & Bird seeks with respect to the ECO and other Natural Environment and District Wide chapters. The amendments are uncertain in achieving the RPS and NZCPS, Particularly RPS policy 7.2 and the NZCPS policies 3, 11, 13 and 15.  | Disallow  |
| Transpower New Zealand Limited | S299.040 | Oppose          | Energy<br>Energy Rules                                    | The submission is contrary to what Forest & Bird seeks with respect to the ECO and other Natural Environment and District Wide chapters.  | Disallow with respect to biodiversity provisions and include reference for the need to consider rules in the ECO and other Natural Environment and District Wide chapters.          |
| Transpower New Zealand Limited | S299.051 | Support in part | Energy<br>Energy Rules                                    | Agree that a default rule is appropriate to capture energy activities that are not specifically provided for. However, such a rule needs to recognise that non-complying rules are included in the ENG chapter. There may also be rules in other chapters that apply to energy activities and   | Allow in part.<br>If there are any prohibited rule which apply to energy activities then these should also be referred to so that the default discretionary rule is not conflicting |

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|                                |          |                |                                 | the rule should be worded so as <i>not</i> to override a more restrictive activity status.  | ENG - RXX<br>Any energy activity which is not a permitted, controlled, restricted discretionary or discretionary activity <u>or non-complying activity</u><br>Activity Status Discretionary Activity<br>status where compliance not achieved: N/A |
| Transpower New Zealand Limited | S299.059 | Oppose in part | Earthworks<br>Earthworks Rules  | Forest & Bird is concerned that the amendments sought by Transpower could result in the amendments Forest & Bird seek not being captured with respect to earthworks for Energy activities   | Disallow or ensure that amendments sought by Forest & Bird to the EW rules are incorporated into energy activity rules for earthworks.  |
| Transpower New Zealand Limited | S299.060 | Oppose in Part | Coastal<br>Environment          | Forest & Bird consider it is appropriate for objectives, policies, and rules in the CE chapter to apply to the National Grid. However, agrees that some clarification is needed.  | Allow submission to the extent that clarification that the CE chapter applies in addition to the ENG chapter is included in the proposed plan.  |
| Transpower New Zealand Limited | S299.068 | Oppose         | CE – P8                         | Forest & Bird seeks the deletion of CE-P8 as set out in its submission. However, agrees that clarification may be helpful so it is clear that both the ENG and CE chapters apply to the National Grid.  | Disallow  |
| Transpower New Zealand Limited | S299.069 | Oppose         | Coastal<br>Environment<br>Rules | Forest & Bird consider it is appropriate for objectives, policies, and rules in the CE chapter to apply in addition to ENG activity provisions, including the National Grid. It is not appropriate to amend the Plan to state that ENG – P8 takes precedence. ENG P8 as proposed specifically recognises there may be cases where an avoid approach is needed to protect values. The amendment sought would make any such consideration on the basis of other policies uncertain and potentially meaningless. All | Disallow  |

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|                                |          |                |  | relevant policy should be available to consider as appropriate to the coastal environment.  |   |
| Transpower New Zealand Limited | S299.070 | Oppose in Part | CE – R4                                | Forest & Bird seeks amendments in its submission to restrict activities in Natural Open Space zones and to limit the scale of buildings and earthworks on other zone, including for Energy Activities or Network Utilities that are permitted under ENG, INF, and TRN chapters.   | Disallow  |
| Transpower New Zealand Limited | S299.071 | Oppose         | CE – R22                               | Forest & Bird considers that the meaning of the rule is clear.  | Disallow  |
| Transpower New Zealand Limited | S299.072 | Oppose in Part | Ecosystems and Indigenous Biodiversity | While Forest & Bird considers that some clarification may be helpful, it considers that some difference in approach may be appropriate. For example, to provide direction on where avoidance is necessary as recognised in ENG- P8. Further it is appropriate for provisions in the ECO chapter to apply to indigenous vegetation beyond that which is significant indigenous vegetation.                                 | Allow submission to the extent that clarification that the ECO chapter applies in addition to the ENG chapter is included in the proposed plan. |
| Transpower New Zealand Limited | S299.073 | support        | ECO – P1                               | The relief sought is consistent with Forest & Bird submission   | Allow   |
| Transpower New Zealand Limited | S299.074 | Oppose in part | ECO - P6                               | Forest & Bird consider it is appropriate for objectives, policies, and rules in the ECO chapter to apply to the National Grid. In particular direction of matters where avoidance is required to protect significant values, including to give effect needs to be included in ECO chapter provisions that apply to ENG (and other) activities. ENG – P8 recognises that avoidance may be required to protect some values. | Disallow  |
| Transpower New Zealand Limited | S299.075 | Oppose in part | ECO – R1                               | The amendments sought will result in a loss of indigenous biodiversity values.<br>The relief sought is contrary to Forest & Bird submission relief for Rule ECO- R1   | Disallow  |
| Transpower New Zealand Limited | S299.076 | Oppose in part | ECO – R2                               | The amendments sought will result in a loss of indigenous biodiversity values. The relief sought  | Disallow  |

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|   |                |                |                                  | is contrary to the relief sought in Forest & Bird submissions   |   |
| Transpower New Zealand Limited  | S299.079       | Oppose in part | Natural Features and Landscapes  | While Forest & Bird considers that some clarification may be helpful, it considers that some difference in approach may be appropriate. For example, to provide direction on where avoidance is necessary as recognised in ENG- P8.   | Allow submission in part to the extent that clarification that the NFL chapter applies in addition to the ENG chapter is included in the proposed plan. |
| Westpower Limited   | S547.069       | Oppose in part | Energy                           | The plan addressed may activities such as vegetation clearance and activities within overlays and the CE which should also apply to energy activities whether the latter is specifically referred to or not   | Disallow  |
| Silver Fern Farms Limited by its authorised agents Mitchell Daysh Limited | S441.009       | Oppose         | NENV-01                          | Part 2 of the RMA s6 recognises and provides for matters of national importance including the protection of outstanding natural features and landscapes. This is stronger direction than “has regard to”.   | Disallow  |
| Silver Fern Farms Limited by its authorised agents Mitchell Daysh Limited | S441.016       | Oppose in part | ECO-P2                           | In this context, functional need and operational need are not particularly restrictive but the inclusion of “operational” as proposed by the submitter could conflict with the protection of indigenous biodiversity under s6(c), the NZCPS, NPSIB or the RPS. For this reason we consider that only functional need should be included and limited to the National Grid and some regionally significant infrastructure (as defined in the RPS) within the coastal environment. Beyond the coastal environment both terms could be used but must be limited to regionally significant infrastructure. | Disallow  |
| Silver Fern Farms Limited by its authorised agents Mitchell Daysh Limited | S441.022 to 25 | Oppose         | CE-O3<br>CE-P5<br>CE-P6<br>CE-R4 | As above for ECO-P2 and for consistency with the NZCPS, operational need should not be included.  | Disallow  |

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| KiwiRail Holdings Limited       | S442       | Support         | INF-O2                                    | The submission is generally consistent with protection and maintenance of indigenous biodiversity and is generally consistent with Forest and Birds original submission.   | Allow    |
| KiwiRail Holdings Limited       | S442.022   | Support         | INF-O4                                    | The submission is generally consistent with protection and maintenance of indigenous biodiversity and is generally consistent with Forest and Birds original submission.   | Allow    |
| Manawa Energy                   | S438       | Support in part | All                                       | In addition to specific submission points Forest & Bird has supported or opposed, Forest & Bird generally supports other aspects of the submission which are generally consistent with the protection and maintenance of indigenous biodiversity. In particular regarding identification of SNAs, giving effect to the RPS, NPSIB and protecting outstanding natural landscapes and features.<br>Forest & Bird supports the submission other than where the relief sought would conflict with that sought in Forest & Birds submission | Allow    |
| Manawa Energy                   | S148.00144 | Oppose          | ENG-P1                                    | The submission appears to conflate new and existing renewable electricity regeneration. We recommend separating the existing and new, so that new REG activities are assessed on a case-by-case basis and subject to the effects management hierarchy.   | Disallow |
| Manawa Energy                   | S438.001   | Support         | Definitions                               | Agree minimise is subjective. Replace 'minimise' with avoid, remedy, or mitigate, throughout the plan.   | Allow    |
| Manawa Energy                   | S438.003   | Support         | Definitions<br>CRITICAL<br>INFRASTRUCTURE | For clarity Forest & Bird support the clarification of definitions consistent with National Direction and the RPS for infrastructure as it relates to renewable energy.  | Allow    |
| Waka Kotahi NZ Transport Agency | S450.082   | Oppose          | Ecosystems and Indigenous Biodiversity    | Identification of values is necessary to assess the effects of activities. Determining whether this includes significant values is necessary to provide  | Disallow |

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|                                 |          |        | ECO - P1  | for protection under s6(c). Given that the councils have not thoroughly identified SNA's in their plans more work is required at the consenting level.   |          |
| Waka Kotahi NZ Transport Agency | S450.083 | oppose | Ecosystems and Indigenous Biodiversity<br>ECO - P2  | <p>Forest &amp; Bird considers the wording of this policy being to "allow" problematic as there is no consideration of whether activities are appropriate to achieving protection. Forest &amp; Bird has sought to delete, replace, or amend ECO-P2 to limit consideration of activities to those for maintenance, repair, or operation of lawfully established structure.</p> <p>On that basis the wording sought is not appropriate.</p> <p>While forest &amp; Bird is not opposed to the consideration of both functional and operational needs for critical infrastructure we consider this is captured by amendments to ECO -P7</p> | Disallow |
| Waka Kotahi NZ Transport Agency | S450.086 | Oppose | Ecosystems and Indigenous Biodiversity<br>ECO – P10 | The requirement to avoid is appropriate to give effect to the NZCPS and the RPS.   | Disallow |
| Buller Electricity Limited      | S451     | Oppose | Energy, Infrastructure and Transport                | The proposed amendments are too enabling of new renewable electricity. The amendments sought to not protect and maintain indigenous biodiversity. New REG needs to be subject to the effects mitigation hierarchy.   | Disallow |
| New Zealand Energy Limited      | S463     | Oppose | Energy, Infrastructure and Transport                | The proposed amendments are too enabling of development of new renewable electricity. New Renewable Electricity Generation(REG) needs to be subject to the effects mitigation hierarchy.   | Disallow |

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|  |                                  |                |                                     | Special purpose zones for existing REG is not supported.  |               |
| New Zealand Coal & Carbon Limited                | S472                             | Oppose         | All                                 | The Mineral Extraction Zones in the Plan are not supported  | Disallow      |
| Rocky Mining Limited                             | S474                             | Oppose         | All                                 | The Mineral Extraction Zones are not supported by Forest & Bird.  | Disallow      |
| Development West Coast                           | S484                             | Oppose         | All                                 | The RMA is about use development <u>and</u> <u>protection</u> of natural resources, the submission talks only of use and development.   | Disallow      |
| Horticulture NZ                                  | S486                             | Oppose in part | All                                 | Where the submission is not consistent with the RMA s6, NZCPS, MPSFM and NPSIB, and RPS.  | Disallow      |
| Horticulture NZ                                  | S486.013<br>S486.015<br>S486.017 | Support        | Energy Overview<br>ENG-O3<br>ENG-P3 | The submission is consistent with national direction  | Allow         |
| Horticulture NZ                                  | S486.030                         | Oppose in part | ECO-R1                              | Needs clarification to avoid unintended consequence for indigenous biodiversity. Regarding the proposed amendment to clause 5, the “no site size” limitation is not supported.  | Allow in part |
| Bathurst Resources Limited and BT Mining Limited | S491                             | Oppose         | All                                 | The Mineral Extraction Zones are not supported. The amendments sought will result in a loss of indigenous biodiversity values which is inconsistent with councils functions and responsibilities under section 31(1)(b)(iii) and Section 6 the RMA, and do not give effect to the RPS, NPSFM and the NZCPS. | Disallow      |
| TiGa Minerals and Metals Limited                 | S493                             | Oppose         | All                                 | Submission is not consistent with the RMA, NPSIB, NPSFM, RPS or the NZCPS. The Mineral extraction zones are not supported.  | Disallow      |
| Papahaua Resources Limited                       | S500                             | Oppose         | All                                 | Submission is not consistent with the RMA, NPSIB, NPSFM, RPS or the NZCPS. Mineral extraction zones are not supported.  | Disallow      |
| Stevenson Mining Limited                         | S502                             | Oppose         | All                                 | Submission is not consistent with the RMA, NPSIB, NPSFM or the RPS. Mineral extraction zones are not supported.   | Disallow      |
| Aggregate and Quarry Association                 | S521                             | Oppose         | All                                 | Suggested amendments and interpretation of the effects management hierarchy risks loss of   | Disallow      |

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|                                   |          |         |  | indigenous biodiversity. This is not consistent with the RMA, NPSIB, NPSFM, NZCPS and the RPS.  |          |
| Queenstown Lakes District Council | S523     | Support | Open Space and Natural Open Space Zones - Cross Boundary Matters | The plan needs to provide more clarity around the appropriateness of mining in the OSZ and NOSZ and the cross-boundary effects.   | Allow    |
| Straterra                         | S536     | Oppose  | All  | Mineral Extraction Zones are not supported. The amendments sought will result in a loss of indigenous biodiversity values which is inconsistent with councils functions and responsibilities under section 31(1)(b)(iii) and Section 6 the RMA, and do not give effect to the RPS, NPSFM and the NZCPS. | Disallow |
| Terra Firma Mining Limited        | S537     | Oppose  | All  | Mineral Extraction Zones are not supported. The amendments sought will result in a loss of indigenous biodiversity values which is inconsistent with councils functions and responsibilities under section 31(1)(b)(iii) and Section 6 the RMA, and do not give effect to the RPS, NPSFM and the NZCPS  | Disallow |
| Buller District Council           | S538.010 | Support | DEFINITION CRITICAL INFRASTRUCTURE                               | The submission to include the Ports of Westport, Greymouth, and Jackson Bay as Critical Infrastructure or Regionally Significant Infrastructure is consistent with the RPS definition.  | Allow    |
| Buller District Council           | S538.203 | Oppose  | ECO-P7   | The submission point relates to the functional need of critical infrastructure (or Regionally Significant Infrastructure) however we note that the definition does not include mining.  | Disallow |
| Buller District Council           | S538.208 | Oppose  | Ecosystems and Indigenous Biodiversity                           | The new proposed permitted activity rule for vegetation clearance outside of an SNA is not supported. The RMA requires the Council to protect significant natural areas and maintain  | Disallow |

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|   |          |         |            | other indigenous biodiversity. This will result in further loss of indigenous biodiversity.   |          |
| Buller District Council                         | S538.209 | Oppose  | ECO-R2     | As above. In addition this would not be consistent with the NZCPS.  | Disallow |
| Westpower Limited                               | S547     | Oppose  | All        | Forest & Bird recognises the national importance of and supports the need for Renewable Electricity Generation. The Society acknowledges that the West Coast already has some existing REG schemes and the maintenance if these needs to be provided for. However, Forest & Bird recommends that new REG activities are assessed on a case-by-case basis and subject to the effects management hierarchy. In particular Forest and Bird opposes the submitters request to strike out reference to the overlay chapters, particularly the Ecosystems and Indigenous Biodiversity; Landscape and Natural Features; and Natural Character and Margins of Water Bodies; and the removal of their application to the Energy Chapter. | Disallow |
| Buller Conservation Group                       | S552     | Support | All        | Support where the submission is consistent with Forest & Bird's submission  | Allow    |
| Minerals West Coast                             | S569     | Oppose  | All        | The submission is not consistent with the RMA s6 matters of national importance.  | Disallow |
| Minerals West Coast                             | S569.005 | Oppose  | Whole Plan | The submission will result in loss of significant indigenous biodiversity and there are limits to offsetting.   | Disallow |
| WMS Group (HQ) Limited and WMS Land Co. Limited | S599     | Oppose  | All        | Submission is not consistent with the RMA, NZCPS, NPSIB or the RPS and will result in loss of indigenous biodiversity   | Disallow |
| Birchfield Coal Mines Ltd                       | S601     | Oppose  | All        | Submission is not consistent with the RMA, NZCPS, NPSIB or the RPS and will result in loss of indigenous biodiversity   | Disallow |
| Birchfield Ross Mining Limited                  | S604     | Oppose  | All        | Submission is not consistent with the RMA, NZCPS, NPSIB or the RPS and will result in loss of indigenous biodiversity   | Disallow |

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| Phoenix Minerals Limited | S606 | Oppose | All | Submission is not consistent with the RMA, NZCPS, NPSIB or the RPS and will result in loss of indigenous biodiversity | Disallow |
|--------------------------|------|--------|-----|---|----------|