

In the Environment Court of New Zealand
Christchurch Registry

I Mua I Te Kōti Taiao O Aotearoa
Ōtautahi Rohe

ENV-2025-CHC-

Under the Resource Management Act 1991 (**Act**)

In the matter of An appeal under clause 14(1) of the First Schedule of the Act
on a decision on the proposed Te Tai o Poutini Plan

Between **WMS Group (HQ) Limited**
Appellant

And **Te Tai o Poutini Plan Committee**
Respondent

Notice of Appeal

8 December 2025

Appellant's solicitors:

Alex Booker | Kelsey Barry
Anderson Lloyd
Floor 2, The Regent Building, 33 Cathedral Square, Christchurch 8011
PO Box 13831, Christchurch 8141
DX Box WX10009 Christchurch
p + 64 3 379 0037
alex.booker@al.nz | kelsey.barry@al.nz

**anderson
lloyd.**

To: The Registrar
Environment Court
Christchurch

- 1 WMS Group (HQ) Limited (**WMS Group**) appeals against part of a decision (**Decision**) of the Te Tai o Poutini Plan Committee (**Committee**) on the proposed Te Tai o Poutini Plan (**TTPP**).
- 2 WMS Group (HQ) Limited made a submission on the TTPP (S599) and further submissions (FS231) (**Submissions**).
- 3 WMS Group is not a trade competitor for the purpose of section 308D of the Act.
- 4 WMS Group received notice of the decision on or about 10 October 2025.
- 5 The Decision was made by the Te Tai o Poutini Plan Committee (**Decision**).
- 6 The parts of the Decision that WMS Group is appealing include: Part 1 – Introduction and General Provisions (Interpretation, Definitions); Part 2 – District-Wide Matters (Strategic Directions, MIN - Mineral Extraction); Natural Environment Values (ECO - Ecosystems and Indigenous Biodiversity, NC - Natural Character and Margins of Waterbodies); General District-Wide Matters (CE - Coastal Environment, LIGHT – Light, NOISE – Noise); Part 3 – Area-Specific Matters (RURZ - Rural Zones - Objectives and Policies, GRUZ - General Rural Zone – Rules, PORTZ - Port Zone and MINZ - Mineral Extraction Zone).

Background

- 7 WMS Group is a privately owned critical minerals, ports and bulk logistics business based on the West Coast of the South Island. Within the WMS Group, Westland Mineral Sands Co. undertakes critical mineral mining and West Coast Bulk Logistics operates port and shipping activities.
- 8 WMS Group is developing a multi-generational industry for New Zealand and the West Coast Region, through critical minerals mining, the revitalisation of the Westport and Greymouth ports, innovative practices and investment in long-term land use and sustainability. Mineral licenses and permits are held across 20,000ha of private freehold land. The first active mine site is in Cape Foulwind near Westport, and resource consents have been granted for a second site near Hokitika.
- 9 WMS Group has a strong commitment to environmental planning, monitoring and enhancement, aiming to leave land better than prior to mining activities, and to contribute positively to nature on the West Coast.

General reasons for the appeal

10 The Decision introduces changes:

- (a) which do not adequately provide for mineral extraction and ancillary activities to occur across all relevant zones, including rural and open space zones. This has potential to constrain environmentally responsible mineral extraction activities and associated activities on the West Coast. The provisions in the notified TTPP (with minor amendments sought by WMS Group) better provide for economic development, acknowledge that minerals are fixed resources essential to the region's economy, and include appropriate environmental safeguards. In contrast, the Decision places greater emphasis on preserving and protecting the environment generally at the expense of necessary community economic enablement.
- (b) to other parts of the TTPP that have consequential impacts on mining activities, which do not recognise the functional and operational requirements of mining activities and which have the potential to take away any reasonable consenting pathway. For example, in the Coastal Environment (identified in the TTPP as covering a large area of urban, rural, industrial and various other types of land) provisions are unreasonably restrictive and will affect progress and development across various industries, including port activities, mineral extraction and farming.
- (c) in response to higher order documents which are outdated. For example, the West Coast Regional Policy Statement (**WCRPS**) has not been amended in line with national direction and the TTPP, in giving effect to and referencing parts of the WCRPS (in the ECO - Ecosystems and Indigenous Biodiversity chapter in particular), has been developed in line with an outdated policy statement. Higher order documents¹ have been amended throughout the TTPP process and the (final) Decision needs to accord with these documents.
- (d) which extend the application of higher order documents to matters beyond what was intended which has the effect of unreasonably restricting mining activities. For example:
 - (i) the effects management hierarchy (including biodiversity offsetting and compensation) has been defined and generally applies throughout the TTPP (for example, Light-O2, and ECO-R10), whereas in the National Policy Statement-Indigenous Biodiversity's application is specific to areas mapped as Significant Natural Areas (**SNA**);

¹ National Policy Statement for Indigenous Biodiversity, National Policy Statement for Freshwater Management, and National Policy Statement for Freshwater Management.

- (ii) the WCRPS seeks that SNA areas are mapped (Policy 7.1, Appendix 1), and not that Appendix 1 is incorporated into the TTPP.

11 As a result, the TTPP requires amendment as its current form:

- (a) does not assist the councils in carrying out their statutory functions under the Act;
- (b) fails to meet the requirements of section 32 of the Act (in that the proposed objectives, policies and rules are not the most appropriate method for achieving the Act's purpose); and
- (c) does not promote the sustainable management purpose or accord with Part 2 of the Act.

Relief Sought

12 WMS Group is seeking the following relief:

- (a) The TTPP is amended to address the issues raised in this appeal;
- (b) The TTPP is amended to incorporate changes to the Parts listed within this appeal notice generally, and including specifically as proposed in the attached schedule;
- (c) The TTPP is amended to rezone WMS Group mining areas to MINZ, including the Cape Foulwind², the Mananui³ and Karangarua⁴ sites, which is the most appropriate zone for these areas; and
- (d) Any such additional, alternative or consequential relief necessary or appropriate to address matters in this appeal.

13 WMS Group attaches the following documents to this notice:

- (a) A copy of WMS Group submission and further submission.
- (b) A copy of the relevant parts of the Decision.
- (c) An attachment outlining specific relief sought, in addition to the general relief sought in the Notice of Appeal.

² Lot 4 DP 13269, Lot 5 DP 123269, Lot 12 DP 354487, Lot 4 DP 534034 (refer Appendix 1.1 of WMS Group Original Submission).

³ Lot 1 DP 3854 and Section 32 SO 12249 (refer Appendix 1.2 of WMS Group Original Submission).

⁴ RS 4133, Section 1 SO 517318, Lot 1 DP 537701, Section 2 SO 517318, RS 6667, Section 5 SO 517318 and Section 3 SO 517318 (refer Appendix 1.3 of WMS Group Original Submission).

- (d) A list of names and addresses of persons to be served with a copy of this notice.

14 WMS Group is willing to attend mediation on this appeal.

Dated this 8th day of December 2025



Alex Booker / Kelsey Barry
Counsel for the Appellant

This document is filed by Alex Booker and Kelsey Barry, solicitors for the Appellant, of the firm Anderson Lloyd. The address for service of the Appellant is Floor 2, The Regent Building, 33 Cathedral Square, Christchurch 8011.

Documents for service on the filing party may be left at that address for service or may be:

- (a) posted to the solicitors at PO Box 13831, Christchurch 8141; or
- (b) left for the solicitors at a document exchange for direction to DX Box WX10009 Christchurch; or
- (c) transmitted to the solicitors by fax to + 64 3 379 0039; or
- (d) emailed to the solicitors at alex.booker@al.nz | kelsey.barry@al.nz.

WMS – Specific relief sought (in addition to the general relief sought in the Notice of Appeal)

Part	Chapter	Provision	Relief Sought
2	Strategic Directions Overview	Paragraph 3, subpoint 2	Retain wording as notified in the TTPP to ensure the objectives and policies of other chapters in the TTPP are consistent with the Strategic Directions.
2	Mineral Extraction	MIN-P1 – MIN-P5	Delete and retain MIN-O2 – MIN-O6 as notified in the TTPP as objectives. Express recognition that offsetting and compensation are appropriate ways to manage effects.
2	Natural Environment	NENV-O1 – O2 NENV-P1	Delete and retain NENV-O1 – O4 as notified in the TTPP, incorporating changes requested by WMS in original submission 599 (page 24 of S599) which requested recognition of the functional and operational need and a consenting pathway for mineral activities.
2	Ecosystems and Indigenous Biodiversity	Entire chapter ECO-O1 – ECO-O4 ECO-P1 – P10 ECO-R1 – R11	Retain wording as notified in the TTPP, incorporating changes requested by WMS in original submission 599 (pages 31-33 of S599), including particularly to include specific recognition of operational and functional need of activities to be located in an area, and removal of restrictive wording such as "minimise", "restrict" and "preserve" and replace with "management" of <u>significant</u> effects.
2	Natural Character and Margins of Waterbodies	NC-O3 NC-P2 NC-P3 NC- R2 – R4	Amend provisions to ensure activities (such as mining) operational and functional needs are expressly provided for, as requested by WMS in original submission 599 (page 35-36 of S599).
2	Coastal Environment	CE-P2 – P8 CE-R4	Retain wording as notified in the TTPP, incorporating changes requested by WMS in original submission 599 (pages 36-37 of S599).

2	Light	LIGHT-O2 LIGHT-P1, LIGHT-P3 LIGHT-R1, LIGHT-R2, LIGHT-R3, LIGHT-R4, LIGHT-R5	Retain wording as notified in the TTPP, incorporating changes requested by WMS in original submission 599 (pages 38-40 of S599).
2	Noise	NOISE-R2(10), NOISE-R5 – R9, R11	Retain wording as notified in the TTPP, incorporating changes requested by WMS in original submission 599 (page 40 of S599) and for the purposes of NOISE-R9 in the West Coast Bulk Logistics Ltd further submission (p3 of FS152).
3	Rural Zones - Objectives and Policies	RURZ-O1, RURZ-O5 RURZ-P6, RURZ-P22 – 26	Retain wording as notified in the TTPP, incorporating changes requested by WMS in original submission 599 (pages 43-45 of S599). The reference to primary production (as defined to include mining activities) and not land based primary production (which excludes mining activities) should be retained.
3	General Rural Zone - Rules	GRUZ R10 – R11, GRUZ-R17, R24 (now deleted) R25	Retain wording as notified in the TTPP, incorporating changes requested by WMS in original submission 599 (pages 45-46 of S599).
3	Port Zone	PORTZ-P6	Delete.
3	Port Zone	PORTZ-R1, R6, R7	Retain wording as notified in the TTPP, incorporating changes requested by WMS in original submission 599 (page 51 of S599).
3	Mineral Extraction Zone	Entire Chapter MINZ-O1, MINZ-O2 MINZ-P1, MINZ-P2, MINZ-P3, MINZ-P4, MINZ-P5, MINZ-P6, MINZ-P7, MINZ-P8	Retain wording as notified in the TTPP, incorporating changes requested by WMS in original submission 599 (pages 47-49 of S599).

		MINZ-R2, MINZ-R3, MINZ-R6, MINZ-R7	
--	--	------------------------------------	--

Attachment – Submission (S599) and Further Submission (FS231)

Te Tai o Poutini Plan Proposed Plan Submission form

Te Tai o
Poutini Plan
Proposed
Plan

Have
your
say!

We need your feedback. We want to hear from you on the proposed Te Tai o Poutini Plan. What do you support and what would you like changed? And why? It is just as important to understand what you like in the Proposed Plan as what you don't. Understanding everyone's perspectives is essential for developing a balanced plan.

Your details:

First name: **Ray**

Surname: **Mudgway**

Are you submitting as an individual, or on behalf of an organisation?

Individual

Organisation

Organisation (if applicable): **WMS Group (HQ) Limited and WMS Land Co. Limited**

Would you gain an advantage in trade competition through this submission?

Yes

No

If you **could** gain an advantage in trade competition through this submission please complete the following:

I am /am not directly affected by an effect of the subject matter of the submission that (a) adversely affects the environment; and (b) does not relate to trade competition or the effects of trade competition.

Postal address: **120 Medway Road, Hanmer Springs, Hanmer Springs 7334, New Zealand**

Email: **ray@wmsnz.com and alex.booker@al.nz**

Phone: **+64 27 575 7993, 0276562647**

Signature:



Date: **10 November 2022**

Your submission:

The specific provisions of the proposal that my submission relates to are:

Strategic Direction

Energy Infrastructure and Transport

Hazards and Risks

Historical and Cultural Values

Natural Environment Values

Subdivision

General District Wide Matters

Zones

Schedules

Appendices

General feedback

All submitters have the opportunity to present their feedback to Commissioners during the hearings process. Hearings are anticipated to be held in the middle of 2023. Please indicate your preferred option below:

I wish to speak to my submission

I do not wish to speak to my submission

If others make a similar submission, would you consider presenting a joint case with them at a hearing?

Yes, I would consider presenting a joint case

No, I would not consider presenting a joint case

Public information - all information contained in a submission under the Resource Management Act 1991, including names and addresses for service, becomes public information. The content provided in your submission form will be published to the Te Tai o Poutini Plan website and available to the public. It is your responsibility to ensure that your submission does not include any personal information that you do not want published.

Want to know more?
tppp.westcoast.govt.nz

0508 800 118



Te Tai o Poutini
PLAN

A combined district plan for the West Coast

Submission on notified proposal for Proposed Te Tai o Poutini Plan

- 1 This is a submission on the Proposed Te Tai o Poutini Plan (TTPP) by WMS Group (HQ) Limited (**WMS Group**) and WMS Land Co. Limited (**WMS Land**).

Background

- 2 WMS Group was incorporated on 22 February 2022, with the purpose of managing the operations side of the 'Westland Mineral Sands' business (collectively **WMS**). WMS Group is the ultimate holding company for Westland Mineral Sands Co. Limited, WMS Shipping Co. Limited (**WMS Shipping**) and West Coast Bulk Logistics Limited (**WCBL**). WMS Land was incorporated on 20 August 2021 as the land holding entity for the WMS business. The purpose of WMS is to undertake mineral sand mine projects in the West Coast Region, and ensure the export of those mineral sands through secure and reliable logistics networks. The mineral sand mines will mine for ilmenite, garnet and Rare Earth Elements (**REE**) for export. WMS holds a number of mining, prospecting and exploration permits across the West Coast.
- 3 The global demand for critical and green minerals is huge. Ilmenite is used for many industrial purposes e.g. paint tints, tile glazing, hardening steel etc. Every consumer uses ilmenite in many forms. Garnet is used for sand paper (the red coarse material), water jet cutting and similar uses, as well as having health benefits. New Zealand north Westland deposits have world class monazites which contain REE, these elements are small scale, extremely high value, and strategically important globally. Every electronic device, wind turbine, EV battery etc. needs REE. WMS considers that some of these minerals will be included in the New Zealand Critical Mineral List when it is released later this year.
- 4 WMS aims to establish an inter-generational and sustainable mineral sands sector for the West Coast. The coast has seen its native logging disappear and other mines close. Mineral sands export is the largest and only identified future prospect of scale for the region, so its importance cannot be underestimated. The establishment of the sector provides a breadth of well-paid employment opportunities for the region. The skill sets required are in sync with the capabilities and proud history of extractive industries in the region.
- 5 WMS has a wide breadth of mining experience within the company, and many of our people have a strong connection to the West Coast. We are proud to be a West Coast company, and intend to deliver positive economic impacts and employment opportunities to the West Coast community with minimum environmental impact.
- 6 In addition to the positive economic impacts and employment opportunities directly attributable to our mining operations, it is also our intention to re-establish West Coast ports. WMS will be investing capital in the re-establishment of the Westport and Greymouth Ports, and potentially the Jackson Bay ports (**Ports**) – beginning with the port at Westport. WMS (through WCBL) now has a long-term lease for both the Westport¹ and Greymouth² ports. With the help of a

¹ <https://bullerdc.govt.nz/council-approves-port-lease/>

funding package from the Provincial Development Unit in 2020, work is underway on a \$4m project to install floating pontoons at Westport Port. Funding of \$4m has also been received for floating pontoons at Greymouth Port. The funding will help secure the West Coast's fishing industry, responsible for 250 jobs and approximately \$35m GDP per year, while upgrades to the Ports will also improve transport and logistics across various industries.

- 7 Our work on transport, logistics and supply chain networks across New Zealand to compliment the mineral sands business has a range of flow on benefits for the region, including much-needed emergency resilience. The regions heavy historical reliance on trucking routes makes it vulnerable to major natural disasters, such as an earthquake on the Alpine Fault. By creating new transport options via coastal shipping, WMS is enabling bulk shipping from the West Coast once again and improving the regions emergency resilience. As we work to secure a long-term transport supply chain for the West Coast, we will partner with other New Zealand industries, including the dairy sector, to get products in (such as fuel, fertilisers) and products out. Our operations will open a major opportunity for New Zealand-wide transport and logistics partnerships.
- 8 In addition, WMS Land are landowners of significant areas of farmland. The intention being that, where viable, land will be used (in the short term) for mineral extraction and then be returned to productive farmland once extraction and rehabilitation is completed. In particular, WMS owns the following landholdings:
 - (a) Cape Foulwind: Lot 4 DP 13269, Lot 5 DP 13269, Lot 12 DP 354487 and Lot 4 DP 534034;
 - (b) Ruatapu: Lot 1 DP 3854, Section 32 SO 12249; and
 - (c) Karangarua: RS 4133, RS 6677, Section 5 SO 517318, Section 2 SO 517318, Lot 1 DP 537701, Section 1 SO 272, RS 4134 and Section 1 SO 517318.

Maps detailing the landholdings are **attached** as **Appendix 1**.

- 9 As a mining company, port operator and landholder, WMS have significant interest in the West Coast, and how activities will be managed through the TTPP.

Strategic Direction

- 10 WMS strongly supports the strategic direction within the TTPP. In particular, that:
 - (a) the Mineral Extraction Strategic Objectives recognise the vital role that extractive industries play in the West Coast, and those activities are enabled accordingly across appropriate zones (such as the mineral extraction, rural and open space zones);

² <https://www.greymouth.govt.nz/04your-council/news-and-public-notice/item=id:2h72lnevc17q9s9jdn7>

- (b) the importance of infrastructure is recognised and provided for;
 - (c) the strategic objectives are to be considered in resource consent applications; and
 - (d) for the purposes of interpreting and implementing the TTPP, all other objectives and policies in all other chapters are to be read and achieved in a manner consistent with the Strategic Objectives.
- 11 The TTPP must also recognise the critical role that transport infrastructure plays on the West Coast (as elaborated on in the Infrastructure and Transport section of this submission). WMS has therefore sought:
- (a) that objective TRN-O1 is moved to the 'Connections and Resilience' strategic objectives; and
 - (b) the 'Critical Infrastructure' definition should include the Westport, Greymouth and Jackson Bay Ports; and
 - (c) a new objective for critical infrastructure.
- 12 WMS has sought some minor amendments to wording of the strategic direction provisions, including amendment of NENV-03 to recognise mining alongside infrastructure by replacing the word "infrastructure" with "activities with a functional or operational need". Additional amendments are detailed in the Bulk Submission Spreadsheet attached.

Infrastructure and Transport

- 13 WMS is required to use roads for its mineral sand operations, and the Ports all need to receive/distribute commodities for/from shipping.
- 14 Roads should be required to be utilised to their full extent, and the Transport Chapter needs to recognise the importance of efficient and effective use and operation of the transport network. WMS seeks recognition of the importance of efficient and effective use and operation of the transport network in the Objectives, which should flow-through to the lower provisions. WMS has also sought a reverse sensitivity objective, seeking to protect the transport network from incompatible uses – as required by the West Coast Regional Policy Statement.³ The level of investment required for roading means that roads need to be effectively used to capacity, not minimised for amenity purposes.
- 15 Provisions in the Transport Chapter have an unnecessary heavy emphasis on amenity factors, which has the potential to stifle the efficient and effective use and operation of the transport network during resource consenting. This approach is not supported through robust section 32 analysis, other than stating amenity is an 'issue' raised over the past 20 years. Reference is

³ West Coast Regional Policy Statement, Objective 1 and Policy 4.

also made to 'contemporary best practice' and 'higher order planning instruments' but there is no reference to the exact documents or what they actually seek to impose. Possible amenity effects to a small group of people should not reduce the efficient and effective use of the transport network, particularly given the significant investment required by the private companies, government bodies and rate payers and the corresponding economic benefits to the community.

- 16 Previous plans have expressly disregarded amenity and noise effects from roads,⁴ and WMS consider that the TTPP needs to exclude amenity and noise effects from roads for resource consent applications. Exclusions, like that found in NOISE-R2(7), should not be limited to use of the road that is *'part of or compatible with a normal residential activity'*. Otherwise there will be implications for trucking activities (both day and night) requiring assessment of all activities along the proposed route. WMS has outlined specific relief sought in the Bulk Submission Spreadsheet, with deletion or amendment sought to TRN-O2, TRN-O3 and TRN-P1 to remove reference to amenity and associated effects (i.e. noise, vibration and glare).

Sites and Areas of Significance to Māori

- 17 WMS support the important role that Poutini Ngāi Tahu play in the management of the West Coast, including planning processes, and support their mana whenua in relation to their sites and areas of significance, pounamu and aotea.
- 18 WMS also support the identification of Sites and Areas of Significance to Māori (**SASM**) and the identification of the Aotea and Pounamu Management Areas, where these are clearly delineated to the extent necessary, and the values sought to be protected are expressly detailed in the schedule and supported in evidence. It is not clear what specific values are sought by the identified sites and the extent of those values. WMS seek review of the SASM and Management Areas by mana whenua and seeks changes to the rule framework applying to these areas so that a consenting pathway for fixed in location extractive activities is preserved. Any mineral extraction should be assessed for its effects, if any, on the specific values of a SASM, not presumed to have adverse effects.
- 19 There are over 200 SASM detailed in Schedule 3, and the Aotea and Pounamu Management Areas (particularly the Pounamu Management Area) cover extensive areas of land, some of the land containing existing or consented extractive activities.⁵ WMS is concerned that some of the provisions will have unintended consequences that are problematic for mineral extraction and farming. Strong and directive objectives and policies seeking to "avoid" and "protect" are likely to cause problems for consideration of the gateway test. In this context,

⁴ Westland District Plan and Buller District Plan.

⁵ An example being SASM19, which covers the WMS consented mineral sand mine (RC210051), at Lot 4 DP 534034, Lot 12 DP 354487, Lot 5 DP 13269 and Lot 4 DP 13269.

discretionary, non-complying and prohibited rules are restrictive, particularly when Poutini Ngāi Tahu will be notified of applications in these areas in any case (which is supported).

- 20 WMS seeks to remove and/or amend overly restrictive provisions to ensure a pathway for mineral extraction. We consider that mineral extraction activities can be undertaken in a manner that respects Poutini Ngāi Tahu as mana whenua, and appropriately manages effects on SASM and the Management Areas, without the use of provisions that could effectively prevent mineral extraction. For example:
- (a) SASM-P1 – This policy refers to 'cultural landscapes', which is not defined and could be interpreted to apply more widely than SASM and Management Areas. It also requires protection from adverse effects generally, meaning that not even a minor or less than minor adverse effect could be considered appropriate. This policy should instead require protection of SASM and the Management Areas from significant adverse effects.
 - (b) SASM-P6 – This policy requires the avoidance of disturbance or removal of aotea and pounamu in the Management Areas. Extractive activities, or earthworks more generally, may cause unintentional disturbance/unintentional removal and this policy should be limited to the intentional disturbance or removal.
 - (c) SASM-P11 – This policy seeks to avoid mining and quarrying (other than Poutini Ngāi Tahu collection of Pounamu and Aotea) in (and in proximity to) SASM. It involves a blanket assumption of adverse effects and is restrictive when combined with non-complying rule SASM-R15. Subsection a., relating to mining and quarrying, should be deleted. The reference to 'in proximity to' is uncertain.
 - (d) SASM-R7 – This rule provides a default discretionary activity status for mineral extraction in a Management Area where written approval is not obtained by the relevant Poutini Ngāi Tahu rūnanga. SASM-R7 also means that any unintentional extraction of aotea/pounamu will result in a prohibited activity. Is the intended purpose of this rule (and Policy 6) is to prevent the *intentional* mining for aotea or pounamu, particularly given this rule only relates to mineral extraction and quarrying, rather than earthworks more generally? WMS seek a permitted rule with a standard requiring compliance with the Pounamu Vesting Act. Letters of approval from mana whenua to determine activity status is not an effects-based mechanism. In the instance that the letter of approval mechanism is retained, WMS seek a deemed approval provision to ensure that there is at least a timeframe to be adhered to. Amendment to SASM-R7 will require consequential amendment and/or deletion of SASM-R11 and SASM-R19, as sought in the Bulk Submission Spreadsheet.
 - (e) SASM-R15 – Provides a default non-complying activity status for mineral extraction in an SASM. This rule assumes that mining will have adverse effects on the SASM and undermines the mineral extraction rule framework. Schedule 3 details the values

associated with a specific SASM, and WMS understand that the focus of the SASM is to protect those values. In that case, a restricted discretionary rule with the matter of discretion relating to the protection of those values would be a sufficient protection.

- 21 Schedule 3 needs to be reviewed for accuracy and to ensure that the SASM areas and values are accurately delineated and captured.
- 22 WMS is happy to discuss any of the above submission points and would like to engage with mana whenua.

Open Space and Rural Zones

- 23 The TTPP intends mineral extraction to be enabled in the rural and open space zones, which WMS strongly supports.
- 24 WMS has proposed some minor amendments to provisions in the Rural and Open Space Zones to ensure mineral extraction is appropriately enabled. These amendments are around ensuring restricted discretionary rules operate as restricted discretionary rules not discretionary ones, references to 'functional and operational need', 'management' rather than 'minimisation' of effects, 'providing for' rather than 'supporting' mineral extraction and ensuring consistency by referring to 'primary production' rather than 'rural production'.

Special Purpose Zone – Mineral Extraction Zone

- 25 WMS strongly support the introduction of the Mineral Extraction Zone (**MEZ**), and its application to areas where there are currently authorised mineral extraction activities.
- 26 WMS consider that the MEZ should also apply to mining permit areas under the Crown Minerals Act 1991, such as the mining permit areas held by WMS. Specifically, WMS seek that Lot 4 DP 13269, Lot 5 DP 13269, Lot 12 DP 354487 and Lot 4 DP 534034, being the area subject to RC210051 and identified at paragraph 1.1 of Appendix 1 to this Submission, be rezoned to MEZ. As this area is the subject of a resource consent (commenced by Order of the Environment Court⁶), it meets the 'currently authorised' criteria of the MEZ, and accordingly should be rezoned to MEZ.
- 27 WMS also specifically seek that their other landholdings, detailed at Appendix 1 paragraph 1.2 and 1.3 and subject to Mining Permits 60508 and 60503 respectively, are rezoned to MEZ. In our submission it would be appropriate to apply the MEZ to mining permit areas because:
- (a) It would give effect to WCRPS Chapter 5, Policy 2(b)(i) by retaining the potential future use of land with significant mineral resources.

⁶ *Gane & ors v Buller District Council* [2022] NZEnvC 110.

- (b) Mining permits have been subject to feasibility studies to ensure they are capable of retrieval on a cost/benefit analysis, meaning areas granted mining permits are likely to meet the WCRPS definition of 'significant mineral resources' – being *'the monetary value of the mineral resource is significant to the local community, and employment is created in extracting the resource, based on the latest information available about the resource at the time'*.⁷
 - (c) It preemptively addresses reverse sensitivity effects associated with mineral extraction.
 - (d) It protects the land for its highest value use.
 - (e) It aids in the application of MINZ-P2 (seeking to prevent activities locating in areas that could compromise access to mineral deposits);
 - (f) Mineral Extraction would remain subject to Council's control through the controlled activity status (as permits will not meet the definition of 'lawfully established' required for the permitted activity); and
 - (g) the land is intended to be mined and is the more appropriate zone.
- 28 WMS strongly support the enabling provisions contained within the MEZ. WMS have recommended some minor amendments to provisions within the MEZ, for instance to refer to the 'management' of effects rather than the 'minimisation' of effects (i.e. MINZ-O2; MINZ-P7).
- 29 WMS also strongly support the rule framework within the MEZ. However, WMS submit that as a Special Zone only applying to 'lawfully established' mining activities, the TTPP overlays should not apply to the MEZ. WMS understands that this was the original intention for the MEZ, and that is one of the reasons that overlay features are listed as matters of discretion in the restricted discretionary rules (otherwise it would reflect a duplication). This provides the ability for overlay objectives and policies to be considered.

Special Purpose Zone – Port Zone

- 30 WMS support the application of the Port Zone to the Westport and Greymouth Ports (subject to some minor extensions to both zones to ensure all its leased land is covered). WMS also seek consideration and discussion with the Council and landowners about the potential to rezone the land at Jackson Bay surrounding the wharf area to Port Zone to future proof the area, including but not limited to Section 209 TN OF Arawata, Section 208 TN OF Arawata, Section 8 TN OF Arawata, Section 9 TN OF Arawata and Section 10 TN of Arawata (as identified in **Appendix 2**).
- 31 WMS consider that the Overview should emphasise the importance of the Ports for emergency resilience and diversification from land-transport, and establish the Ports as

⁷ RPS, Glossary, 'Significant mineral resource'.

'Critical Infrastructure' (in terms of the TTPP) and regionally significant infrastructure (in terms of the WCRPS). WMS have sought amendments in the bulk submission spreadsheet to appropriately enable the safe and efficient operation of the Ports, recognise their functional and operational needs, and remove unworkable requirements (such as consideration of amenity and nuisance effects, fencing/landscaping of storage/car parking and unusual recession plane requirements).

- 32 As a Special Purpose Zone applying on the basis of existing and future regionally significant port activities, WMS consider that the Port Zone should not be subject to the overlay chapters. As with the MEZ, where necessary permitted activity standards or matter of discretion could be included to ensure consideration of overlay objectives and policies.

Other Relief

- 33 **Definitions:** WMS strongly supports the inclusion of the National Planning Standards definitions of 'Functional Need' and 'Operational Need', and has sought amendment to some provisions in the TTPP to ensure that these definitions are utilised where appropriate. WMS consider that the National Planning Standards definition of 'Primary Production' should be included in the TTPP, and replace reference to 'rural production' (or the like) throughout the TTPP. WMS consider that the 'Mineral Exploration' and 'Mineral Prospecting' definitions could benefit from an inclusion of ancillary activities, bringing them in line with the 'Mineral Extraction' definition, which is supported. Finally, WMS consider that the Westport, Greymouth and Jackson Bay Ports should be included in the definition of 'Critical Infrastructure'.
- 34 **Glossary:** Ensure all Schedule 3 values are defined in the glossary, such as wāhi tohu, mahinga kai and nohoanga.
- 35 **Hazardous Substances:** WMS considers that there should be recognition of hazardous substance facilities associated with mining. We have sought amendment to HS-P3 in the Bulk Submission Spreadsheet on that basis.
- 36 **Ecosystems and Indigenous Vegetation:** WMS consider that directive provisions seeking to "minimise, restrict, preserve" can be problematic for passing the gateway test. Those types of provisions need to be limited to Significant Natural Areas meeting the significance threshold pursuant to the WCRPS (regardless of whether this assessment is undertaken as part of the TTPP and therefore mapped as an SNA, or as part of the site specific assessment required during resource consenting). In this regard, WMS has sought amendment to some provisions, and sought recognition for functional and operational need where it is not provided.
- 37 **Natural Features and Landscapes:** Some of the WMS permits and landholdings are partially covered with Outstanding Natural Landscape (**ONL**) overlays, and the justification for those overlays is not entirely clear. WMS seek to ensure that the mapping of ONL and Outstanding Natural Features (**ONF**) is accurate, and consider that the ONL/ONF number should be added to the mapping to direct users to the type and values in Schedules 5 and 6.

WMS also seek minor amendments to the natural features and landscapes provisions to ensure that mining is enabled to the extent intended by the TTPP. For example, the inclusion of mineral extraction activities in NFL-P3 and the inclusion of 'functional and operational need' tests.

- 38 **Natural Character and Margins of Waterbodies:** WMS support the provisions of appropriate subdivision, use and development as well as the recognition of functional and operational need. WMS seek to amend provisions to ensure all relevant provisions refer to both functional *and* operation need.
- 39 **Coastal Environment:** The Coastal Environment identified in the TTPP covers a large area of land, encompassing urban, rural, industrial and various other types of land. Of particular relevance to WMS, the Coastal Environment overlay encompasses the Greymouth and Jackson Bay Ports, along with permit areas and landholdings designated by WMS for future mineral sand mining. It is a restrictive overlay, with very limited permitted buildings (particularly if the underlying zone is General Rural). Application of the Coastal Environment will affect progress and development across various industries, including port activities, mineral extraction and farming. WMS seek recognition of functional and operational need within the Coastal Environment provisions. WMS also seek amendment to provisions to ensure the enablement, to the extent appropriate, of port, mineral extraction and farming activities. In particular, limitations on building ground floor area and height are overly restrictive in the context of the underlying General Rural Zone.
- 40 **Earthworks:** WMS support the enabling provisions of the Earthworks chapter, and seek minor amendments to ensure workability, such as by removing the works "temporary and small scale" from EW-P1, clarifying the cleanfill requirement in EW-R1 and referring the reader to the relevant Open Space/General Rural zone provisions in EW-R2. WMS also seek consequential amendments across all relevant earthworks provisions to reflect the exclusion of mineral extraction, exploration and prospecting from the definition of earthworks.
- 41 **Light:** WMS seeks minor amendments to wording of some provisions to ensure the read as intended, and also seeks to ensure appropriate Lux limits are applied to the Port, Industrial, Mineral Extraction and Rural zones.
- 42 **Noise:** WMS support the limits and time periods identified for the MEZ (NOISE-R11) and the Port Zone (NOISE-R9). However, WMS does not consider there is an appropriate justification to limit the weekend/public holiday daytime hours to 8:00am to 8:00pm in the General Rural and Open Space Zones. WMS seeks that the weekend/public holiday hours are the same as the weekday hours, being 7:00am to 10:00pm.
- 43 **Spatial Mapping – Zoning:** Rezone the landholdings detailed in Appendix 1 to MEZ, ensure Port Zone at Westport and Greymouth ports covers the WCBL lease area, and potentially

rezone landholdings detailed in Appendix 2 to Port Zone subject to discussions with the Council and landowners.

- 44 **Schedule 3:** WMS seek that sites of significance reviewed for accuracy by mana whenua to ensure relevance (particularly SASM 19, SASM 151 and SASM 179), and that the relevant significance values are included in Schedule 3.
- 45 **Schedule 9:** WMS has reviewed this schedule and seeks the inclusion of the Cape Foulwind mineral sand mine pursuant to RC210051.
- 46 **Appendix 7:** WMS seeks amendments to Appendix 7 as outlined in the bulk submission spreadsheet in order to improve readability, relevance and cohesion.

Decision Sought

- 47 WMS seeks any and all relief required to give effect to this submission, including but not limited to the relief detailed in the Bulk Submission Spreadsheet **attached** to this submission at '**Attachment 1 Relief Sought**'.
- 48 In addition, WMS specifically seek any other relief as may be required to give effect to this Submission (including the Bulk Submission Spreadsheet), including alternative, further or consequential amendments to any provisions of the TPP that address the matters raised by WMS.

Dated this 10th day of November 2022

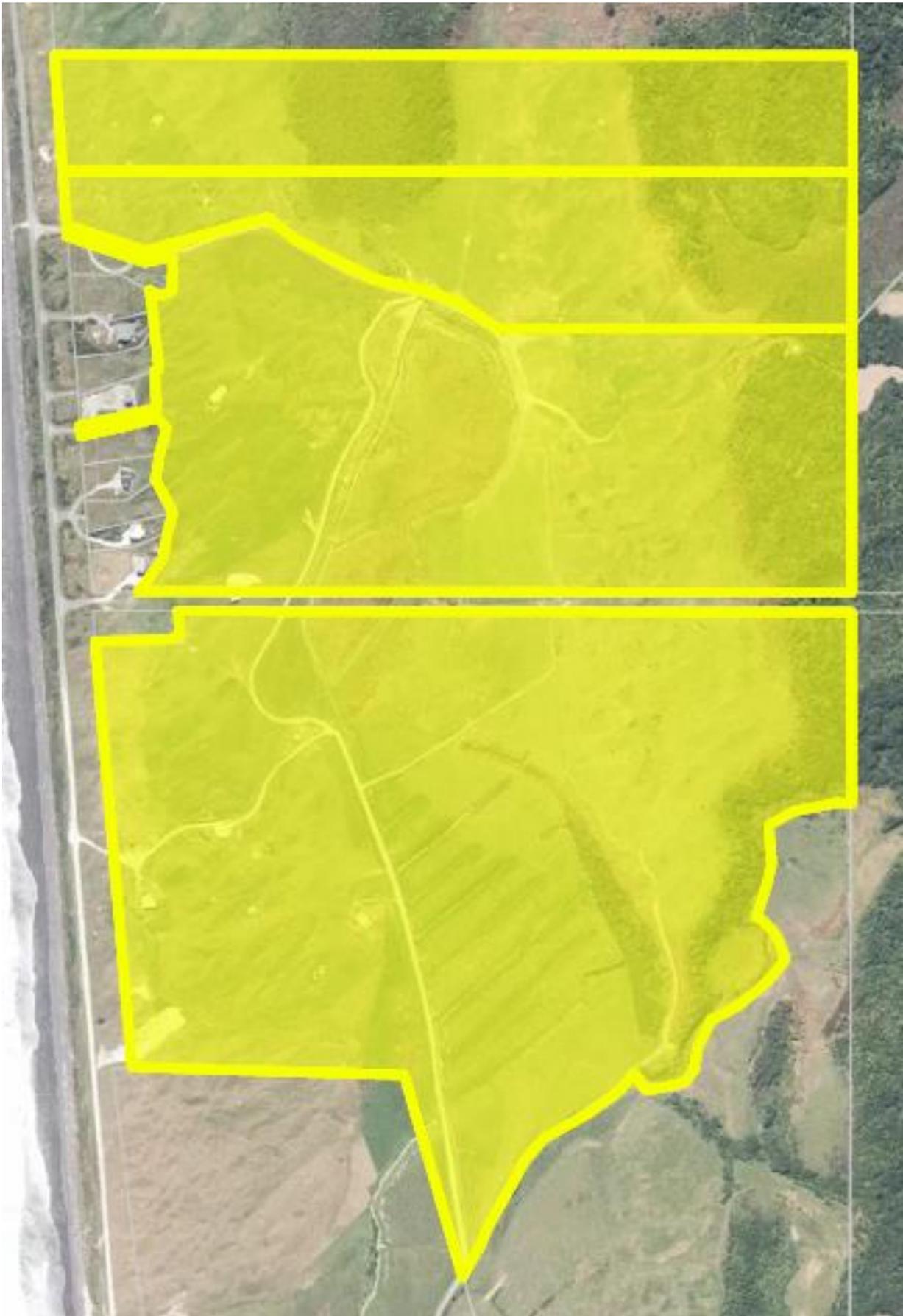


Ray Mudgway
Director, Westland Mineral Sands Co. Limited

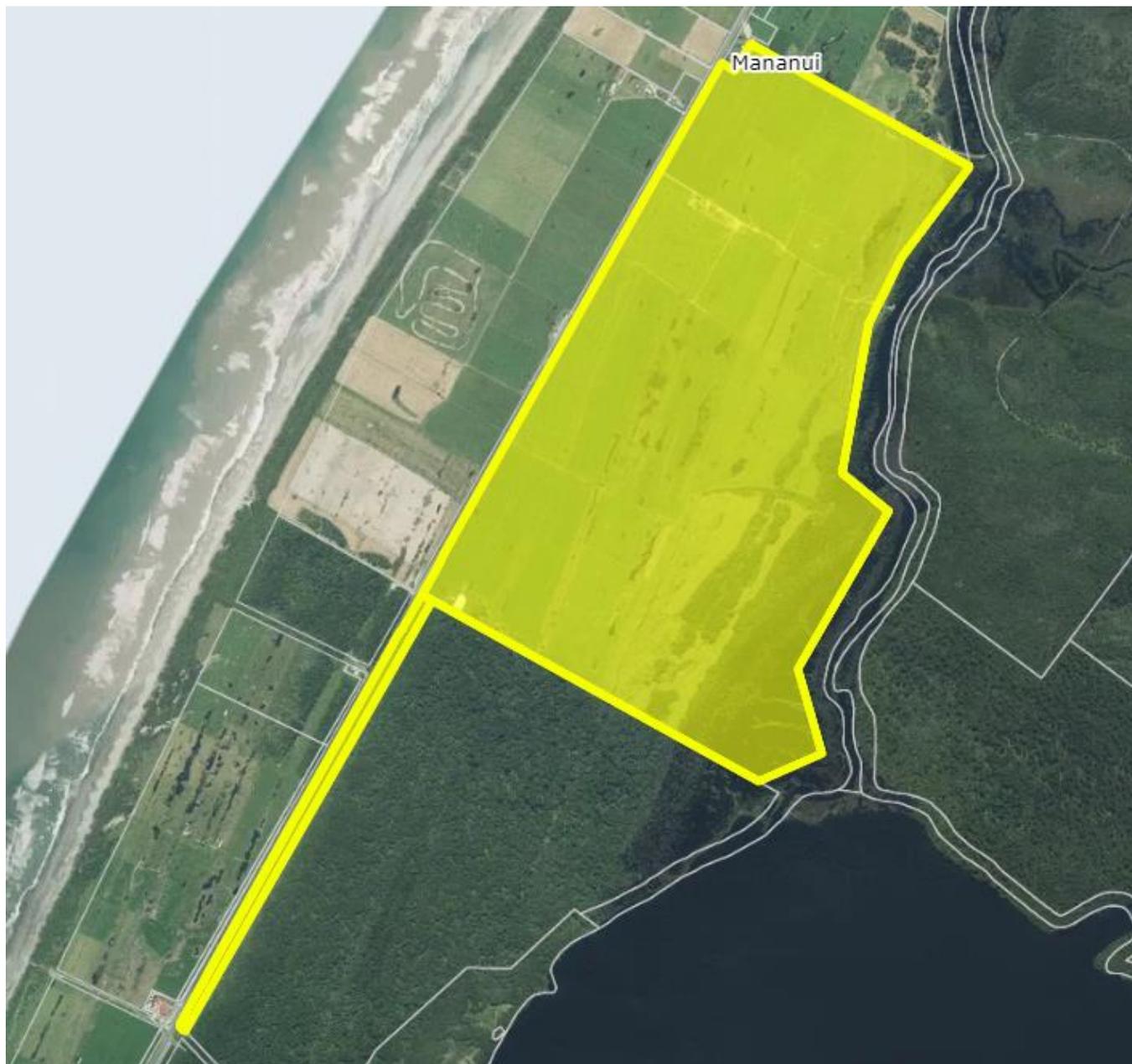
Electronic address for service of submitter: ray@wmsnz.com; alex.booker@al.nz
Telephone: +64 27 575 7993, 0276562647
Contact persons: Ray Mudgway and Alex Booker

Appendix 1. Landholdings for rezoning to Mineral Extraction Zone

1.1 Cape Foulwind: Lot 4 DP 534034, Lot 12 DP 354487, Lot 5 DP 13269 and Lot 4 DP 13269:



1.2 Mananui/Lake Mahinapua: Lot 1 DP 3854 and Section 32 SO 12249:



1.3 Manakiaua River: RS 4133, Section 1 SO 517318, Lot 1 DP 537701, Section 2 SO 517318, RS 6677, Section 5 SO 517318 and Section 3 SO 517318:



Appendix 2: Possible landholdings for rezoning to Port Zone

2.1 Jackson Bay: Section 209 TN OF Arawata, Section 208 TN OF Arawata, Section 8 TN OF Arawata, Section 9 TN OF Arawata and Section 10 TN of Arawata



Plan section	Provision	Support Oppose	Reasons	Decision sought
[General]				
[General]	[General]			
Whole Plan				
Whole Plan	Whole plan	Neutral	To enable alternative relief which may give effect to the matters in the submission.	Alternative, consequential, or necessary additional relief to give effect to the matters raised generally in this submission.
Introduction Section				
Introduction	Introduction			
Introduction	Mihi			
Introduction	He Mihi			
Introduction	Description of the Districts	Support	This section of the Proposed Plan sets out the history of the three districts that comprise the West Coast region, and highlight the strong history of mining, and current reliance on mining as a key industry in each of the districts.	Retain as notified.
How The Plan Works Section				
How The Plan Works	How The Plan Works			
How The Plan Works	Satutory Context			
How The Plan Works	Figure 1 RMA Plan relationships			
How The Plan Works	Figure 2 RMA responsibilities and where they have effect			
How The Plan Works	Te Tiriti o Wāitangi (Treaty of Waitangi) and the Resource Management Act			
How The Plan Works	General Approach			
How The Plan Works	Table 1: Classes of Activities			
How The Plan Works	Step 1 - Check the planning maps			
How The Plan Works	Step 2 - Locate the relevant zone rules			
How The Plan Works	Step 3 - Locate the relevant district-wide rules			
How The Plan Works	Step 4 - Check the relevant standards			
How The Plan Works	Step 5 - Apply for resource consent			
How The Plan Works	Table 2: National Environmental Standards and rules in Te Tai o Poutini Plan			
How The Plan Works	Notification			
How The Plan Works	Information to be submitted with resource consents			
How The Plan Works	Legal effect of Rules			
How The Plan Works	Cross Boundary Matters			
How The Plan Works	Management of Cross Boundary Matters			
How The Plan Works	Relationships between spatial layers			
How The Plan Works	Spatial layer name			
How The Plan Works	Zone			
How The Plan Works	Overlay			
How The Plan Works	Precinct			
How The Plan Works	Specific controls			
How The Plan Works	Development area			
How The Plan Works	Designation			
How The Plan Works	Heritage Order			
How The Plan Works	Residential Zone Discriptions			
How The Plan Works	General Residential Zone			
How The Plan Works	Large Lot Residential Zone			
How The Plan Works	Medium Density Residential Zone			
How The Plan Works	Residential Zones			
How The Plan Works	Rural Zone Descriptions			
How The Plan Works	General Rural Zone			
How The Plan Works	Rural Lifestyle Zone			
How The Plan Works	Settlement Zone			
How The Plan Works	Rural Zones			
How The Plan Works	Commercial and Mixed Use Zone Descriptions			
How The Plan Works	Commercial Zone			
How The Plan Works	Mixed Use Zone			
How The Plan Works	Neighbourhood Centre Zone			
How The Plan Works	Town Centre Zone			

			Insert PRIMARY PRODUCTION definition as follows:
			<u>"means:</u> <u>a.any aquaculture, agricultural, pastoral, horticultural, mining, quarrying or forestry activities; and</u> <u>b.includes initial processing, as an ancillary activity, of commodities that result from the listed activities in a);</u> <u>c.includes any land and buildings used for the production of the commodities from a) and used for the initial processing of the commodities in b); but</u> <u>d.excludes further processing of those commodities into a different product."</u>
Interpretation	Definitions	Amend	A new definition is sought - PRIMARY PRODUCTION - which is contained in the 2019 National Planning Standards. This definition recognises that primary production which typically occurs in a rural environment includes mining activities.
Interpretation	Advice Note		
Interpretation	ACCESSORY BUILDING		
Interpretation	ACCESSWAY		
Interpretation	ACTIVITY		
Interpretation	ADDITION		
Interpretation	ADDITIONS AND ALTERATIONS		
Interpretation	ADJACENT		
Interpretation	ADJOINING		
Interpretation	AGRICULTURAL, PASTORAL AND HORTICULTURAL ACTIVITIES		
Interpretation	AIRPORT ACTIVITIES		
Interpretation	ALLOTMENT		
Interpretation	AMENITY VALUES		
Interpretation	ANCILLARY ACTIVITY		
Interpretation	APPROVED BUILDING PLATFORM		
Interpretation	ARCHAEOLOGICAL SITE		
Interpretation	AREA OF SIGNIFICANT INDIGENOUS BIODIVERSITY		
Interpretation	ARTIFICIAL LAKE OR POND		
Interpretation	BED		
Interpretation	BOUNDARY ADJUSTMENT		
Interpretation	BROWNFIELD		
Interpretation	BUILDING		
Interpretation	BUILDING FOOTPRINT		
Interpretation	BUILDING PLATFORM		
Interpretation	CAMPING GROUNDS		
Interpretation	CEMETARIES		
Interpretation	CLEANFILL		
Interpretation	COASTAL ENVIRONMENT		
Interpretation	COMMERCIAL ACTIVITY		
Interpretation	COMMUNITY CORRECTIONS ACTIVITY		
Interpretation	COMMUNITY FACILITIES, EDUCATION FACILITIES and HEALTH FACILITIES		
Interpretation	COMMUNITY FACILITY		
Interpretation	COMMUNITY SCALE		
Interpretation	COMMUNITY SIGN		
Interpretation	CONSERVATION ACTIVITIES		
Interpretation	CONTAMINATED LAND		
Interpretation	COUNCIL ENGINEERING STANDARDS		
			The definition of Critical Infrastructure appears to include the majority of infrastructure defined as "Regionally Significant Infrastructure" in the West Coast Regional Policy Statement, however it does not include the ports of Greymouth, Westport and Jackson Bay. It is unclear why the Proposed Plan has not used a term consistent with the Regional Policy Statement. The submitter seeks that the ports of Greymouth, Westport and Jackson Bay are included within the definition of Critical Infrastructure to give effect to the Regional Policy Statement.
Interpretation	CRITICAL INFRASTRUCTURE	Support in part	Amend the definition of CRITICAL INFRASTRUCTURE as follows: means the rail network, state highways, special purpose roads, airports, wastewater, reticulated water and stormwater plants, defence facilities, telecommunications networks and electricity generation, transmission and distribution assets, <u>and the ports of Westport, Greymouth and Jackson Bay.</u>
Interpretation	CRITICAL RESPONSE FACILITIES		
			The definition of cultural landscape is vague, and should refer to specific areas which are identified as cultural landscapes, to provide clarity to plan users about where the corresponding provisions apply.
Interpretation	CULTURAL LANDSCAPE	Oppose in part	Amend the definition to refer to a schedule which specifically identifies landscapes of cultural significance to Poutini Ngai Tahu.
Interpretation	DUST		

Interpretation	EARTHWORKS			Amend the definition of earthworks to exclude minerals extraction prospecting and exploration, as follows:
Interpretation	EDUCATIONAL FACILITY			
Interpretation	EMERGENCY SERVICE FACILITY			
Interpretation	ENERGY ACTIVITY			
Interpretation	ESPLANADE RESERVE			
Interpretation	ESPLANADE STRIP			
Interpretation	EXISTING BUILDINGS AND STRUCTURES			
Interpretation	EXISTING USE RIGHTS			
Interpretation	FAÇADE CONTROL STREET			
Interpretation	FARM QUARRY			
Interpretation	FREEDOM CAMPING			
Interpretation	FUNCTIONAL NEED	Support	The submitters support the inclusion of the National Planning Standards definition of functional need.	Retain as notified.
Interpretation	GREENFIELD			
Interpretation	GROSS FLOOR AREA			
Interpretation	GROUND LEVEL			
Interpretation	HABITABLE ROOM			
Interpretation	HEALTHCARE AND MEDICAL ACTIVITIES			
Interpretation	HEAVY VEHICLE			
Interpretation	HEIGHT			
Interpretation	HERITAGE FABRIC			
Interpretation	HERITAGE PROFESSIONAL			
Interpretation	HERITAGE RESOURCE			
Interpretation	HISTORIC HERITAGE			
Interpretation	HOME BUSINESS			
Interpretation	HOMESTAY			
Interpretation	INDIGENOUS VEGETATION CLEARANCE			
Interpretation	INDUSTRIAL ACTIVITY			
Interpretation	INFRASTRUCTURE			
Interpretation	INTENSIVE INDOOR PRIMARY PRODUCTION			
Interpretation	IWI/PAPATIPU RŪNANGA MANAGEMENT PLAN			
Interpretation	LAeq			
Interpretation	LAF(max)			
Interpretation	LAKE			
Interpretation	LAND DISTURBANCE			
Interpretation	LARGE SCALE			
Interpretation	LAWFULLY ESTABLISHED			
Interpretation	MAIN STREET FRONTAGE			
Interpretation	MAINTENANCE			
Interpretation	MĀORI LAND			
Interpretation	MĀORI PURPOSE ACTIVITIES			
Interpretation	MINERAL			
Interpretation	MINERAL EXPLORATION	Amend	The submitters support the inclusion of the mineral exploration definition, however the definition should provide for ancillary activities which are reasonably necessary to occur. An amendment is proposed to enable this.	has the same meaning as in the Crown Minerals Act 1991 (as set out below) ... includes any drilling, dredging or excavations (whether surface or subsurface) <u>and any ancillary activities</u> that are reasonably necessary to determine the nature and size of a mineral deposit.
Interpretation	MINERAL EXTRACTION	Amend	The definition of 'Mineral Extraction' is supported. However, the submitters seek the inclusion of indigenous vegetation clearance/vegetation clearance.	... and includes ancillary activities such as earthworks, <u>indigenous vegetation clearance/vegetation clearance</u> , landscaping and rehabilitation works ...
Interpretation	MINERAL EXTRACTION MANAGEMENT PLAN			
Interpretation	MINERAL PROSPECTING	Amend	The submitters support the inclusion of the mineral prospecting definition, however the definition should provide for ancillary activities which are reasonably necessary to occur. An amendment is proposed to enable this.	has the same meaning as in the Crown Minerals Act 1991 (as set out below) ... iii. Taking samples by hand or hand held methods; and iv. Taking small samples offshore by low-impact mechanical methods; <u>and v. ancillary activities reasonably necessary to identify land likely to contain mineral deposits or occurrences.</u>

Interpretation	MINIMUM LOT SIZE			
Interpretation	MINOR RESIDENTIAL UNIT			
Interpretation	NATIONAL GRID			
Interpretation	NATIONAL GRID SUBDIVISION CORRIDOR			
Interpretation	NATIONAL GRID YARD			
Interpretation	NATURAL HAZARD MITIGATION ACTIVITIES			
Interpretation	NATURAL HAZARD MITIGATION STRUCTURE			
Interpretation	NET SITE AREA			
Interpretation	NETWORK UTILITY OPERATOR			
Interpretation	NOISE			
Interpretation	NOTIONAL BOUNDARY			
Interpretation	OFFICIAL SIGN			
Interpretation	OPEN SPACE MANAGEMENT PLAN			
Interpretation	OPERATIONAL NEED	Support	The submitters support the inclusion of the National Planning Standards definition of Operational Need.	Retain as notified.
Interpretation	OUTDOOR LIVING SPACE			
Interpretation	OUTSTANDING COASTAL ENVIRONMENT			
Interpretation	OVERLAY CHAPTER			
Interpretation	PAPAKĀINGA			
Interpretation	PAPATIPU RŪNANGA			
Interpretation	PARKS FACILITIES			
Interpretation	PARKS FURNITURE			
Interpretation	POINT STRIP			
Interpretation	PORT ACTIVITIES	Support	The submitters support the inclusion of a definition of port activities, and the list of activities which are included.	Retain as notified.
Interpretation	POUTINI NGĀI TAHU			
Interpretation	POUTINI NGĀI TAHU ACTIVITIES			
Interpretation	RECREATION ACTIVITY			
Interpretation	RECONSTRUCTION			
Interpretation	RELOCATED BUILDING			
Interpretation	RELOCATION			
Interpretation	RENEWABLE ELECTRICITY GENERATION			
Interpretation	RENEWABLE ELECTRICITY GENERATION ACTIVITIES			
Interpretation	REPOSITIONING			
Interpretation	RESEARCH ACTIVITY			
Interpretation	RESIDENTIAL ACTIVITY			
Interpretation	RESIDENTIAL BUILDING			
Interpretation	RESIDENTIAL UNIT			
Interpretation	RETAIL ACTIVITY			
Interpretation	RETIREMENT VILLAGE			
Interpretation	REVERSE SENSITIVITY			
Interpretation	RIPARIAN MARGIN			
Interpretation	RIVER			
Interpretation	ROOT PROTECTION AREA			
Interpretation	RURAL INDUSTRY			
Interpretation	SENSITIVE ACTIVITY			
Interpretation	SHARED PATHWAY			
Interpretation	SIGN			
Interpretation	SIGNIFICANT ELECTRICITY DISTRIBUTION LINE			
Interpretation	SIGNIFICANT NATURAL AREA			
Interpretation	SITE			
Interpretation	SMALL SCALE			
Interpretation	STADIUM ACTIVITY			
Interpretation	STORMWATER			
Interpretation	STRUCTURE			
Interpretation	STRUCTURE PLAN			
Interpretation	SUBSTATION (DISTRIBUTION)			
Interpretation	SUBSTATION (ZONE)			
Interpretation	SUPPORTED RESIDENTIAL ACCOMMODATION			
Interpretation	TEMPORARY ACTIVITY			
Interpretation	TEMPORARY MILITARY TRAINING ACTIVITY			
Interpretation	TRADE RETAIL AND TRADE SUPPLIERS			
Interpretation	TRANSMISSION LINES			
Interpretation	UNOCCUPIED BUILDING			
Interpretation	UPGRADING			

Interpretation	URBAN ZONE
Interpretation	VEHICLE CROSSING
Interpretation	VISITOR ACCOMMODATION
Interpretation	WATERBODY
Interpretation	WETLAND

Glossary Section

Amend the Glossary to include new terms, as follows:

Glossary	Glossary
Glossary	ahikāroa
Glossary	ana tūpāpaku
Glossary	aotea
Glossary	ara tawhito
Glossary	hāpua
Glossary	ingoa
Glossary	kāinga
Glossary	karakia
Glossary	kawa
Glossary	ki uta ki tai
Glossary	kōiwi
Glossary	mana whenua
Glossary	mātauranga Māori
Glossary	maunga
Glossary	mauri
Glossary	pā
Glossary	pā tawhito
Glossary	papatūānuku
Glossary	rākau tapu
Glossary	ranginui
Glossary	rohe
Glossary	roto
Glossary	ruapara
Glossary	rūnanga
Glossary	tangata whenua
Glossary	tapu
Glossary	Tai o Poutini
Glossary	taonga tuku iho
Glossary	tauranga waka
Glossary	Te Waipounamu
Glossary	tikanga
Glossary	tino rangitiratanga
Glossary	tohu
Glossary	tuhituhi o neherā
Glossary	tūpuna
Glossary	urupā
Glossary	wāhi tapu
Glossary	wāhi tongarere
Glossary	wāhi tūpuna
Glossary	waiwhakaheke tūpāpaku
Glossary	whakairo
Glossary	whakapapa
Glossary	whānau
Glossary	whanaungatanga
Glossary	whenua pakanga

Amend

The inclusion of a glossary is supported, however there are a number of terms referenced in SCHEDULE THREE which are not defined in the glossary. These definitions need to be included to assist plan users with interpreting the values associated with sites and areas of significance to Maori. It is noted that some of these terms are explained in the Tangata Whenua section of the Proposed Plan, but should be repeated here for ease of use.

wāhi tohu
wāhi taonga
mahinga kai
nohoanga
Māori Reserve
tohu whenua
marae

Abbreviations Section

National Direction Instruments Section

Tangata Whenua Section

PART 2 - DISTRICT WIDE MATTERS Section

PART 2 - DISTRICT WIDE MATTERS

PART 2 - DISTRICT WIDE MATTERS

Strategic Direction Section

Strategic Direction

STRATEGIC DIRECTION

Strategic Direction
Strategic Direction
Strategic Direction
Strategic Direction

Strategic Directions Overview
AG
Agriculture
Agriculture Strategic Objectives

Support

The submitters support the overview, and in particular the requirement that all other objectives and policies in all other chapters of the Plan are to be read and achieved in a manner consistent with the strategic directions, and that strategic objectives may require specific consideration and application to resource consent applications.

Retain as notified.

Strategic Direction

AG - O1

Support in part

The submitters support this objective, however seeks that the objective refers to primary production, which is defined in the National Planning Standards.

To maintain the productive value of versatile soils and agricultural land for current and future ~~agricultural and horticultural uses~~ primary production.

Strategic Direction
Strategic Direction
Strategic Direction

AG - O2
CR
Connections and Resilience

Support

The submitters support this objective which recognises the significance of agriculture to the West Coast economy .

Retain as notified.

Include a new objective in the Connections and Resilience section (move from Transport Section) as follows:

Strategic Direction
Strategic Direction

Connections and Resilience Strategic Objectives
CR - O1

Amend

The Strategic Directions in the Proposed Plan do not recognise the critical importance of land transport infrastructure in servicing communities and providing for economic activity. The importance of land transport should be appropriately recognised.

"To recognise and provide for the critical role land transport infrastructure plays in supporting communities including emergency services, and economic activity on the West Coast/Te Tai o Poutini."

Strategic Direction
Strategic Direction

CR - O2
CR - O3

Support

"Critical infrastructure" includes vital land transport networks which are crucial for economic activity, including the transportation of mineral sands and other products. This objective recognises the importance of critical infrastructure. As noted in submissions on the definition section the submitters seek that the West Coast ports are recognised as Critical Infrastructure, consistent with the West Coast Regional Policy Statement.

Retain as notified.

Strategic Direction
Strategic Direction
Strategic Direction

CR - O4
MIN
Mineral Extraction

Support

The submitters support the recognition that the West Coast needs to become more self sufficient in terms of critical infrastructure, and this is one of the drivers behind WMS re-establishing the ports at Greymouth, Westport and Jackson Bay.

Retain as notified.

Strategic Direction

MIN - O1

Support

This objective recognises and provides for mining, and seeks to avoid duplication of regulation, which is a critical component of the West Coast economy.

Retain as notified.

Strategic Direction

MIN - O2

Support

This objective recognises that mineral extraction, prospecting and exploration occur throughout a number of proposed zones, including Rural and Open Space Zones.

Retain as notified.

Strategic Direction

MIN - O3

Support

This objective recognises that minerals only occur in certain locations, and therefore require consenting pathways where other activities may be considered inappropriate. This is being recognised in national policy statements and national environmental standards, and should be reflected in the Proposed Plan.

Retain as notified.
Amend the objective as follows:

Strategic Direction
Strategic Direction

MIN - O4
MIN - O5

Support in part

This objective seeks to protect mineral extraction activities from reverse sensitivity effects. While the objective is supported, there is concern about the use of the word "existing", because this may preclude consideration of effects on Minerals Extraction Zones where activity is not currently occurring but anticipated by the Proposed Plan.

"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."

Strategic Direction
Strategic Direction
Strategic Direction

MIN - O6
NENV
Natural Environment

Support

This objective recognises that there may be effects associated with mining, and provides for the effects to be avoided, remedied or mitigated.

Retain as notified.

Strategic Direction	Natural Environment Strategic Objectives		
Strategic Direction	NENV- O1		
Strategic Direction	NENV- O2		Amend NENV - O3 as follows:
			"To recognise:
			a.The substantial contribution to the protection of natural environment values that is made by the existence of public conservation land in protecting significant areas, habitats and features;
		This objective recognises the fact that the West Coast has a large proportion of land protected by virtue of being public conservation land and being subject to additional controls to protect flora and fauna. The objective should also recognise the fixed-in-location nature of minerals extraction, and the fact that sometimes these locations coincide with significant areas.	b.The <u>functional and operational</u> need for infrastructure <u>and mineral extraction activities</u> to sometimes be located in significant areas; and
Strategic Direction	NENV - O3	Support in part	c.The need to support the ethic of stewardship and to consider the positive effects of the conservation estate in achieving the requirements of the RMA. Amend NENV - O4 as follows:
			"To clearly identify:
			a.Unique and important natural environment areas and features on the West Coast/Te Tai o Poutini which <u>require a greater degree of protection</u> must be protected ; and
		This objective suggests that some areas of the West Coast <u>must</u> be protected, which is directive. The submitters seek that this objective is amended to provide a pathway for instances where protection cannot be achieved.	b.Areas where subdivision, use and development to enable community economic, cultural and social wellbeing can be sustainably managed."
Strategic Direction	NENV - O4	Oppose in part	
Strategic Direction	POU		
Strategic Direction	Poutini Ngāi Tahu		
Strategic Direction	Poutini Ngāi Tahu Strategic Objectives		
Strategic Direction	POU - O1		
Strategic Direction	POU - O2		
Strategic Direction	POU - O3		
Strategic Direction	POU - O4		
Strategic Direction	Poutini Ngāi Tahu Strategic Policies		
Strategic Direction	POU - P1		
Strategic Direction	POU - P2		
Strategic Direction	POU - P3		
Strategic Direction	POU - P4		
Strategic Direction	POU - P5		
Strategic Direction	POU - P6		
Strategic Direction	POU - P7		
Strategic Direction	POU - P8		
Strategic Direction	POU - P9		
			Amend POU - P10 as follows:
		This objective is directive, and there are examples of minerals extraction within sites and areas of significance to Maori that have previously obtained resource consent. It is considered that the objective should seek consideration of the values and significance and management of potential adverse effects on the values of the site or area of significance, rather than seek absolute protection of the site.	Protect <u>Manage adverse effects on</u> Poutini Ngāi Tahu taonga and cultural sites, including sites and areas of significance to Māori identified in Schedule Three while ensuring Poutini Ngāi Tahu's key role in decision making around their management.
Strategic Direction	POU - P10	Oppose in part	
Strategic Direction	TRM		
Strategic Direction	Tourism		
Strategic Direction	Tourism Strategic Objective		
Strategic Direction	TRM - O1		
Strategic Direction	UFD		
Strategic Direction	Urban form and development		
Strategic Direction	Urban Form and Development Strategic Objective		
Strategic Direction	UFD - O1		
Energy Infrastructure and Transport Section			
Energy Infrastructure and Transport	Energy Infrastructure and Transport		
Energy Section			
Infrastructure Section			
Transport Section			
Transport	TRN		
Transport	Transport		
Transport	Overview		
Transport	Other relevant Te Tai o Poutini Plan provisions		

			Additional objectives are sought which seek to enable the efficient and effective operation of the transport network and which will protect land transport infrastructure from incompatible development. This will give effect to the West Coast Regional Policy Statement (RPS) which refers to regionally significant infrastructure and the need to enable its safe and efficient operation and protect infrastructure from reverse sensitivity effects. Without such an objective the Proposed Plan may not be giving effect to the RPS.		Include two new objectives in the Transport objectives as follows: " <u>To provide for the safe, effective and efficient operation and use of land transport infrastructure to enable the movement of goods and people across the region.</u> " " <u>Land transport corridors and land transport infrastructure are protected from incompatible land use activities and subdivision development, where these are defined as critical infrastructure.</u> "
Transport	Transport Objectives	Support in part	This objective is strongly supported, however given the significance of the land transport infrastructure network to the local economy and communities, this objective should be located in the Strategic Directions chapter.		Retain, but move to CONNECTIONS AND RESILIENCE under STRATEGIC DIRECTIONS. Include an additional objective within the Transport chapter which similarly recognises the importance of protecting the land transport infrastructure.
Transport	TRN - O1	Support in part	This introduces the requirement to consider amenity effects of land transport infrastructure, which is not required by current District Plans on the West Coast, and is contrary to CR - O2. Previous plans made road noise permitted/not applicable when considering resource consents beyond the immediate application site area. Housing has typically been built very close to roads on the West Coast, including the State Highway network, and such a requirement could significantly restrict the movement of people and goods across the region, including mineral concentrate. There are few viable alternatives to land transport, and every aspect of the West Coast economy relies on it.		Delete objective TRN - O2, or alternatively amend as follows: " <u>To provide for the safe and efficient operation of land transport infrastructure, while managing adverse effects on the surrounding environment.</u> " Amend objective TRN - O3 as follows:
Transport	TRN - O2	Oppose	As above, this introduces the requirement to consider amenity effects of land transport infrastructure, which is not required by current District Plans on the West Coast, and is contrary to CR - O2. This objective can be retained, with deletion of the reference to amenity.		"To enable accessibility, safety and connectivity of land transport infrastructure and consider the amenity of for all transport users, including pedestrians and cyclists."
Transport	TRN - O3	Oppose in part			
Transport	TRN - O4				
Transport	TRN - O5				
					Include an additional policy as follows:
Transport	Transport Policies	Amend	The current policies do not adequately protect or enable vital land transport links. An additional policy is required to give effect to CR - O2.		" <u>Recognise, protect and enable the function of land transport infrastructure to ensure the safe and efficient movement of people and goods.</u> " Amend TRN - P1 as follows: "The road and rail networks shall; a.Be maintained or enhanced to provide safe and efficient transportation; b.Consider the needs of all transport users and modes of transport; and c. Minimise effects on adjoining properties including the impacts of vibration, noise and glare. "
Transport	TRN - P1	Oppose in part	This policy requires amenity effects of road and rail networks to be minimised, and is contrary to CR - O2. Because existing housing is located in close proximity to roads, this aspect of the policy would be difficult for many activities to achieve.		
Transport	TRN - P2				
Transport	TRN - P3				
Transport	TRN - P4				
Transport	TRN - P5				
Transport	TRN - P6				
Transport	TRN - P7				
Transport	TRN - P8				
Transport	TRN - P9				
Transport	Transport Rules				
Transport	Advice Notes:				
Transport	Permitted Activities				
Transport	TRN - R1				
Transport	TRN - R2				
Transport	TRN - R3				
Transport	TRN - R4				
Transport	TRN - R5				
Transport	TRN - R6				
Transport	Restricted Discretionary Activities				
Transport	TRN - R7				
Transport	TRN - R8				
Transport	TRN - R9				

Transport	TRN - R10
Transport	TRN - R11
Transport	TRN - R12
Transport	Discretionary Activities
Transport	TRN - R13
Transport	TRN - R14

HAZ - Hazards and Risks Section

HAZ - Hazards and Risks	HAZ - Hazards and Risks
-------------------------	-------------------------

Contaminated Land Section

Hazardous Substances Section

Hazardous Substances	HS
Hazardous Substances	Hazardous Substances
Hazardous Substances	Overview
Hazardous Substances	Hazardous Substances Objectives
Hazardous Substances	HS - O1
Hazardous Substances	Hazardous Substances Policies
Hazardous Substances	HS - P1
Hazardous Substances	HS - P2

Hazardous Substances	HS - P3
Hazardous Substances	HS - P4
Hazardous Substances	NH
Hazardous Substances	Natural Hazards
Hazardous Substances	Natural Hazards Objectives
Hazardous Substances	NH - O1
Hazardous Substances	NH - O2
Hazardous Substances	NH - O3
Hazardous Substances	NH - O4
Hazardous Substances	NH - O5
Hazardous Substances	NH - O6
Hazardous Substances	Policies
Hazardous Substances	NH - P1
Hazardous Substances	NH - P2
Hazardous Substances	NH - P3
Hazardous Substances	NH - P4
Hazardous Substances	NH - P5
Hazardous Substances	NH - P6
Hazardous Substances	NH - P7
Hazardous Substances	NH - P8
Hazardous Substances	NH - P9
Hazardous Substances	NH - P10
Hazardous Substances	NH - P11
Hazardous Substances	NH - P12
Hazardous Substances	NH - P13
Hazardous Substances	NH - P14
Hazardous Substances	Advice Notes:
Hazardous Substances	Rules - All Natural Hazard Overlays
Hazardous Substances	Permitted Activities
Hazardous Substances	NH- R1
Hazardous Substances	NH - R2
Hazardous Substances	NH- R3
Hazardous Substances	NH - R4
Hazardous Substances	Discretionary Activities
Hazardous Substances	NH - R5
Hazardous Substances	Rules - Flood Severe Overlay and Flood Susceptibility Overlay
Hazardous Substances	Permitted Activities
Hazardous Substances	NH - R6
Hazardous Substances	NH - R7
Hazardous Substances	NH - R8

Support in part

This policy recognises that hazardous substances occur in certain locations, however does not reference the Minerals Extraction Zones. These zones often have a requirement for storage of reasonable quantities of fuel and other chemicals to enable daily operations. The submitter has sought elsewhere in this submission for a Minerals Extraction Zone over their consented activity at Okari Road.

Amend HS - P3 as follows:

"Provide for the establishment and expansion of major hazard facilities within the Industrial, Port, Minerals Extraction and General Rural Zones, where adequate separation distances are maintained from sensitive activities and valued natural, cultural and historic heritage features."

Hazardous Substances	NH - R9
Hazardous Substances	NH - R10
Hazardous Substances	Restricted Discretionary Activities
Hazardous Substances	NH - R11
Hazardous Substances	NH - R12
Hazardous Substances	Discretionary Activities
Hazardous Substances	NH - R13
Hazardous Substances	Non-complying Activities
Hazardous Substances	NH - R14
Hazardous Substances	Rules - Earthquake Hazard Overlays - All
Hazardous Substances	Permitted Activities - All Earthquake Hazard Overlays
Hazardous Substances	Permitted Activities
Hazardous Substances	NH - R15
Hazardous Substances	Non-complying Activities
Hazardous Substances	NH - R16
Hazardous Substances	Prohibited Activities
Hazardous Substances	NH - R17
Hazardous Substances	Rules - Earthquake Hazard Overlay - 20m
Hazardous Substances	Permitted Activities
Hazardous Substances	NH - R18
Hazardous Substances	Non-complying Activities
Hazardous Substances	NH - R19
Hazardous Substances	Rules - Earthquake Hazard Overlay - 50m
Hazardous Substances	Permitted Activities
Hazardous Substances	NH - R20
Hazardous Substances	Restricted Discretionary Activities
Hazardous Substances	NH - R21
Hazardous Substances	Discretionary Activities
Hazardous Substances	NH - R22
Hazardous Substances	Non-complying Activities
Hazardous Substances	NH - R23
Hazardous Substances	Rules - Earthquake Hazard Overlay - 100m
Hazardous Substances	Permitted Activities
Hazardous Substances	NH - R24
Hazardous Substances	Restricted Discretionary Activities
Hazardous Substances	NH - R25
Hazardous Substances	Discretionary Activities
Hazardous Substances	NH - R26
Hazardous Substances	Rules - Earthquake Hazard Overlay - 150m
Hazardous Substances	Permitted Activities
Hazardous Substances	NH - R27
Hazardous Substances	Restricted Discretionary Activities
Hazardous Substances	NH - R28
Hazardous Substances	Discretionary Activities
Hazardous Substances	NH - R29
Hazardous Substances	Rules - Earthquake Hazard Overlay - 200m
Hazardous Substances	NH - R30
Hazardous Substances	Restricted Discretionary Activities
Hazardous Substances	NH - R31
Hazardous Substances	Discretionary Activities
Hazardous Substances	NH - R32
Hazardous Substances	Rules - Land Instability Overlay
Hazardous Substances	Restricted Discretionary Activities
Hazardous Substances	NH - R33
Hazardous Substances	Non-complying Activities
Hazardous Substances	NH - R34
Hazardous Substances	Rules - Lake Tsunami Hazard Overlay
Hazardous Substances	Permitted Activities
Hazardous Substances	NH - R35
Hazardous Substances	Restricted Discretionary Activities
Hazardous Substances	NH - R36
Hazardous Substances	Non-complying Activities
Hazardous Substances	NH - R37
Hazardous Substances	Rules for the Coastal Severe and Coastal Alert Overlays

Hazardous Substances	Permitted Activities
Hazardous Substances	NH - R38
Hazardous Substances	NH - R39
Hazardous Substances	NH - R40
Hazardous Substances	NH - R41
Hazardous Substances	Restricted Discretionary Activities
Hazardous Substances	NH - R42
Hazardous Substances	Discretionary Activities
Hazardous Substances	NH - R43
Hazardous Substances	Non-complying Activities
Hazardous Substances	NH - R44
Hazardous Substances	Coastal Setback Overlay
Hazardous Substances	Restricted Discretionary Activities
Hazardous Substances	NH - R45
Hazardous Substances	Non-complying Activities
Hazardous Substances	NH - R46
Hazardous Substances	Coastal Tsunami Overlay
Hazardous Substances	Permitted Activities
Hazardous Substances	NH - R47
Hazardous Substances	Discretionary Activities
Hazardous Substances	NH - R48
Hazardous Substances	Non-complying Activities
Hazardous Substances	NH - R49
Hazardous Substances	Hokitika Coastal Overlay
Hazardous Substances	Permitted Activities
Hazardous Substances	NH - R50
Hazardous Substances	Discretionary Activities
Hazardous Substances	NH - R51
Hazardous Substances	Westport Hazard Overlay
Hazardous Substances	Permitted Activities
Hazardous Substances	NH - R52
Hazardous Substances	Discretionary Activities
Hazardous Substances	NH - R53

HCV - Historical and Cultural Values Section

Historic Heritage Section

Notable Trees Section

Sites and Areas of Significance to Māori Section

Sites and Areas of Significance to Māori	SASM
Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori
Sites and Areas of Significance to Māori	Overview
Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori Objectives
Sites and Areas of Significance to Māori	SASM - O1
Sites and Areas of Significance to Māori	SASM - O2

Sites and Areas of Significance to Māori	SASM - O3
Sites and Areas of Significance to Māori	Sites and Areas of Significance to Māori Policies
Sites and Areas of Significance to Māori	Cultural Landscapes

Sites and Areas of Significance to Māori	SASM - P1
Sites and Areas of Significance to Māori	Identification and access to significant sites and areas
Sites and Areas of Significance to Māori	SASM - P2
Sites and Areas of Significance to Māori	SASM - P3
Sites and Areas of Significance to Māori	SASM - P4

	The objective seeks protection of values of sites and areas of significance to Maori, however these sites often coincide with beach locations and mineral sand deposits. Seeking protection of these values may not provide for mineral extraction of these resources which are only found in certain locations on the West Coast. Amendments to the objective are sought to provide a consenting pathway for these activities.	Amend SASM - O3 as follows: The values of sites and areas of significance to Māori and cultural landscapes are protected from <u>by managing adverse effects associated with</u> inappropriate subdivision, use and development including inappropriate modification, demolition or destruction.
Support in part		Amend SASM - P1 as follows: Protect Poutini Ngāi Tahu cultural landscapes from <u>significant</u> adverse effects of <u>inappropriate</u> subdivision, use and development while enabling their values to be enhanced through ongoing Poutini Ngāi Tahu access and cultural use.
Support in part	The policy seeks proection of Poutini Ngai Tahu cultural landscapes. An amendment has been proposed for consistency with SASM - O3	

Sites and Areas of Significance to Māori Sites and Areas of Significance to Māori	Poutini Ngāi Tahu Roles SASM - P5			
Sites and Areas of Significance to Māori Sites and Areas of Significance to Māori	SASM - P6 Management of Activities on Identified Significant Sites and Areas	Support in part	This policy seeks to support Aotea and Pounamu management. Pounamu ownership is managed through the Pounamu Vesting Act, and also through Crown Minerals Permits. Mineral extraction activities (or earthworks more generally) may cause unintentional disturbance/removal and the policy should be clarified to ensure that unintentional disturbance through mineral extraction for other resources is not captured by this policy.	Amend SASM - P6 as follows: "Within the Pounamu and Aotea Management overlay, enable tino rangatiratanga and kaitiakitanga of the pounamu and aotea resource by Poutini Ngāi Tahu and avoid the <u>intentional</u> disturbance or <u>intentional</u> removal of this resource by non-hapū members. Amend SASM - P7 as follows: Protect and maintain sites and areas of significance to Māori from adverse effects by: a.Ensuring identified sites and areas of significance to Māori are not disturbed, destroyed, removed and/or visually encroached upon by inappropriate activities; and b.Requiring activities on sites and areas of significance to Māori to minimise <u>manage</u> adverse effects on cultural, spiritual and/or heritage values, interests or associations of importance to Poutini Ngāi Tahu. Amend SASM - P8 as follows: Where an activity is proposed within any site or area of significance to Māori identified in Schedule Three ensure that: a.Engagement with Poutini Ngāi Tahu occurs to ensure that effects of the activity on the values of the site or area are understood; b.The accidental discovery protocol in Appendix Four is adopted for any earthworks; c.Any adverse effects on identified values are avoided, unless it can be demonstrated that due to the functional <u>or operational</u> needs of the activity it is not possible to avoid all adverse effects; and d.Any residual effects that cannot be practicably avoided are mitigated in a way that protects, maintains or enhances the values of the site or area.
Sites and Areas of Significance to Māori	SASM - P7	Support in part	A wording amendment is proposed to reflect changes requested to SASM - O3.	
Sites and Areas of Significance to Māori Sites and Areas of Significance to Māori Sites and Areas of Significance to Māori Sites and Areas of Significance to Māori	SASM - P8 SASM - P9 Inappropriate Activities SASM - P10	Support in part	This policy recognises that some activities have a function need to be located within sites and areas of significance to Maori. However, the policy should also recognise that activities may have an operational need to locate within these areas also. Wording amendments are suggested to reflect these requirements.	
Sites and Areas of Significance to Māori	SASM - P11	Oppose in part	This policy is directive and seeks avoidance of mining and quarrying. The sites and areas of significance cover vast coastal areas which coincide with mineral sands deposits. Consents have previously been granted within areas that have been recognised as sites and areas of significance to Maori, through consultation with Poutini Ngai Tahu, indicating that in some circumstances mining can be an appropriate activity within these areas. This policy seeks to avoid demolition and destruction of sites and areas of significance to Maori, which may preclude mining. With such vast areas identified as areas of significance, and these coinciding with valuable mineral sand resources, this policy is problematic. The submitters consider that SASM-P15 is a more appropriate policy for consideration of activities within SASM, and would cover off the requirement for protection in absence of this policy.	Amend SASM P11 as follows: Recognise the significance to Poutini Ngāi Tahu of the sites and areas of significance to Māori listed in Schedule Three and protect the identified values of these sites and areas by avoiding the following activities in, or in close proximity to, these areas; a.Mining and quarrying other than Poutini Ngāi Tahu collection of Pounamu and Aotea; b.Landfills and waste disposal facilities, hazardous facilities and offensive industries; c.Intensive indoor primary production; d.Cemeteries and crematoria; and e.Wastewater treatment plants and disposal facilities.
Sites and Areas of Significance to Māori Sites and Areas of Significance to Māori Sites and Areas of Significance to Māori Sites and Areas of Significance to Māori	SASM - P12 Appropriate Activities SASM - P13 SASM - P14	Oppose in part		Delete SASM - P12, or amend to exclude minerals exploration, prospecting and extraction.

<p>Sites and Areas of Significance to Māori Sites and Areas of Significance to Māori</p>	<p>SASM - P15 Sites and Areas of Significance to Māori Rules Advice Notes: Permitted Activities SASM -R1 SASM -R2 SASM -R3 SASM -R4 SASM -R5</p>	<p>Support in part</p>	<p>This policy recognises in some instances there may be a functional or operational need for the activity to locate within sites and areas of significance to Maori, however the policy refers to "any other use" indicating that some of the previously precluded activities are not provided for with this policy, which includes mining and quarrying. Wording amendments are suggested to ensure this policy provides for any activity that has a functional or operational need to occur in these areas.</p>	<p>Amend SASM - P15 as follows: Allow any other use and development on sites and areas of significance to Māori in Schedule Three where it can be demonstrated that the identified values of the site or area are protected and maintained, having regard to: ...</p>
<p>Sites and Areas of Significance to Māori</p>	<p>SASM -R6</p>	<p>Oppose in part</p>	<p>The definition of earthworks would currently capture minerals extraction, exploration and prospecting. There are other rules which capture these activities within sites and areas of significance to Maori and it is not considered appropriate for this rule to also apply to these activities. Wording amendments are suggested to reflect this.</p>	<p>Amend SASM - R6 as follows: SASM - R6 Earthworks (<u>excluding minerals extraction, exploration and prospecting</u>) Buildings and Structures not Provided for in SASM - R2 in Schedule Three - Sites and Areas of Significance to Māori Amend SASM - R7 as follows:</p>
<p>Sites and Areas of Significance to Māori Sites and Areas of Significance to Māori</p>	<p>SASM -R7 SASM -R8 SASM -R9 Controlled Activities SASM - R10 Discretionary Activities</p>	<p>Support in part</p>	<p>This rule seeks to support Aotea and Pounamu management. Pounamu ownership is managed through the Pounamu Vesting Act, and also through Crown Minerals Permits. The submitter is concerned about the use of a written approval to determine permitted activity status, and suggests that mineral extraction should be a permitted activity subject to adhering to the Pounamu Vesting Act.</p>	<p>Activity Status Permitted Where: 1.In relation to extraction of Aotea: i.Any extraction of Aotea is only undertaken by Te Rūnanga o Makaawhio or their authorised representatives or contractors; ii.Where an Aotea Management Plan prepared by Te Rūnanga o Makaawhio exists, any extraction of Aotea is in accordance with that plan; iii.Where this is Aotea extraction in the Aotea overlay, notice of the activity is provided to the Westland District Council by Te Rūnanga o Makaawhio, at least 10 working days prior to the activity occurring. 2.In relation to extraction of Pounamu: i.Any extraction of Pounamu is only undertaken by Te Rūnanga o Ngāti Waewae, Te Rūnanga o Makaawhio or their authorised representatives or contractors; ii.Where a Pounamu Management Plan prepared by Poutini Ngāi Tahu exists, any extraction of Pounamu is in accordance with that plan; iii.Where this Pounamu extraction is within the Pounamu overlay, notice of the activity is provided to the relevant district council by the relevant Poutini Ngāi Tahu rūnanga, at least 10 working days prior to the activity commencing; 3.In relation to other mineral extraction and quarrying activity: i. <u>The mineral extraction or quarrying activity complies with the Pounamu Vesting Act. Written approval is provided by the relevant Poutini Ngāi Tahu rūnanga – Te Rūnanga o Ngāti Waewae or Te Rūnanga o Makaawhio, that</u></p>
<p>Sites and Areas of Significance to Māori Sites and Areas of Significance to Māori</p>	<p>SASM - R11 SASM - R12</p>	<p>Oppose in part</p>	<p>This rule seeks to support Aotea and Pounamu management. Pounamu ownership is managed through the Pounamu Vesting Act, and also through Crown Minerals Permits. This rule requires written approval from Poutini Ngai Tahu or alternatively resource consent will be required as a discretionary activity. This will override many of the more permissive activity statuses provided for in the Minerals Extraction Zone. Amendments have been sought to SASM-R7 which would make mineral extraction within the overlays permitted subject to adhering to the Pounamu Vesting Act, and subsequent amendments are suggested here to enable mineral extraction not complying with the permitted activity provisions to be notified to the relevant runanga</p>	<p>Amend SASM-R11 as follows: Activity Status Discretionary <u>Notification: Applications for farm quarries and mineral extraction on sites and areas of significance to Māori will always be limited notified to the relevant Poutini Ngāi Tahu rūnanga (absent their written approval).</u></p>

Sites and Areas of Significance to Māori	SASM - R13			
Sites and Areas of Significance to Māori	SASM - R14			
Sites and Areas of Significance to Māori	Non-complying Activities			Amend SASM - R15 as follows:
			This rule makes mineral extraction activities non-complying. It is not considered necessary to have a non-complying activity status for mineral extraction in sites and areas of significance to Maori. As noted in other submission matters, sites and areas of significantce to Maori cover many coastal environments that coincide with valuable mineral sand resources and a non-complying activity status may be prohibitve. A restricted discretionary activity status is sought.	SASM - R15Mineral Extraction by other than by Poutini Ngāi Tahu in Sites and Areas of Significance to Māori
Sites and Areas of Significance to Māori	SASM - R15	Oppose in part		Activity Status Non-complying <u>Restricted Discretionary, with discretion restricted to the protection of the specific values associated with the SASM under Schedule 3.</u>
Sites and Areas of Significance to Māori	SASM - R16			
Sites and Areas of Significance to Māori	SASM - R17			
Sites and Areas of Significance to Māori	SASM - R18			
Sites and Areas of Significance to Māori	Prohibited Activities			
			This rule seeks to support Aotea and Pounamu management. Pounamu ownership is managed through the Pounamu Vesting Act, and also through Crown Minerals Permits. A prohibited activity status is problematic, as minerals extraction may sometimes involve inadvertent extraction of Pounamu which is not the target resource, but may coincide with the target resource. It is considered the discretionary activity status of SASM-R11 adequately provides for the runanga to manage their Aotea and Pounamu resources without including a potentially challenging prohibited activity status.	
Sites and Areas of Significance to Māori	SASM - R19	Oppose		Delete SASM - R19
Natural Environment Values Section				
Natural Environment Values	Natural Environment Values			
Ecosystems and Indigenous Biodiversity Section				
Ecosystems and Indigenous Biodiversity	ECO			
Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity			
Ecosystems and Indigenous Biodiversity	Overview			
Ecosystems and Indigenous Biodiversity	Plantation Forestry			
Ecosystems and Indigenous Biodiversity	Strategic Objectives			
Ecosystems and Indigenous Biodiversity	Wetlands on the West Coast			
				Include an additional objective into Ecosystems and Indigenous Biodiversity as follows:
			An additional objective is sought to give effect to NENV - O3, which recognises that vast tracts of land are afforded a greater degree of protection by virtue of being in public conservation land.	"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 biodisversity within public conservation land."
Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity Objectives	Amend		
Ecosystems and Indigenous Biodiversity	ECO- O1			
Ecosystems and Indigenous Biodiversity	ECO- O2	Support	This objectie supports mineral extraction where values can be maintained.	Retain as notified.
Ecosystems and Indigenous Biodiversity	ECO- O3			
Ecosystems and Indigenous Biodiversity	ECO- O4	Support	This objective supports the maintenance of the range and diversity of ecosystems on the West Coast.	Retain as notified.
Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity Policies			
Ecosystems and Indigenous Biodiversity	ECO - P1			Amend ECO - P2 as follows:
				"Allow activities within areas of significant indigenous vegetation or significant habitats of indigenous fauna where:
				a.This is for a lawfully established activity; or
				b.It is for a Poutini Ngāi Tahu cultural purpose; or
				c.This is undertaken on Poutini Ngāi Tahu or Te Rūnanga o Ngāi Tahu land in accordance with an Iwi/Papatipu Rūnanga Management Plan; or
				d.The activity has a functional <u>or operational</u> need to be located in the area;
				e.The activity has no more than minor adverse effects on the significant indigenous vegetation or fauna habitat."
Ecosystems and Indigenous Biodiversity	ECO - P2	Support in part	This policy recognises that some activities have a functional need to be located within areas of significant indigenous vegetation or habitats of fauna, but should similarly recognise that activities may also have an operational need to locate within these areas.	
Ecosystems and Indigenous Biodiversity	ECO - P3	Support in part	Subsections b and c are supported. Minerals extraction activities often provide the ability for restoration and rehabilitation of ecological corridors.	Retain subsections b and c as notified.

Ecosystems and Indigenous Biodiversity	ECO - P4				Amend ECO P6 as follows:
Ecosystems and Indigenous Biodiversity	ECO - P5				"When assessing consents for subdivision, use and development, avoid activities which will:
					a.Prevent an indigenous species or community being able to persist in their habitats within their natural range in the Ecological District;
					b.Result in a degradation of the threat status, further measurable loss of indigenous cover <u>(with the exception of Manuka and Kanuka) or disruption to ecological processes, functions or connections</u> in land environments in category one or two of the Threatened Environment Classification at the Ecological District level; and
Ecosystems and Indigenous Biodiversity	ECO - P6	Oppose in part	This policy contains language which is inconsistent with the same policy in the West Coast Regional Policy Statement, and does not belong in the Proposed Plan. The policy should also include an exception for Manuka and Kanuka, where there are permitted activity rules for clearance of these species.		c.Result in a reasonably measurable reduction in the local population of threatened taxa in the Department of Conservation Threat Categories 1 – 3a -nationally critical, nationally endangered and nationally vulnerable." Amend ECO - P7 as follows:
					When assessing resource consents in areas of significant indigenous vegetation and significant habitats of indigenous fauna, consider the following matters:
					a.The necessity for the activity to provide for critical infrastructure or renewable electricity generation;
					b.Whether formal protection and active management of all or part of any area of significant indigenous vegetation or habitat will occur as part of the subdivision, use or development;
					c.The extent to which the proposed activity recognises and provides for Poutini Ngāi Tahu cultural and spiritual values, rights and interests;
					d.The cumulative effects of activities within or adjacent to any area of significant indigenous vegetation or habitat;
					e.The effects the activity may have on the introduction or spread of exotic weed species and pest animals both terrestrial and aquatic;
					f.The impacts on mahinga kai;
					g.The impact of the activity on the values of any area of significant indigenous vegetation or habitat, or threatened species and how any potential impact could be avoided, remedied or mitigated;
Ecosystems and Indigenous Biodiversity	ECO - P7	Support in part	The policy recognises the need to provide for offsetting or compensation to deal with residual adverse effects, and this is supported. This policy should also recognise the fixed-in-location nature of minerals extraction, and the fact that sometimes the location of minerals locations coincide with, and have a functional and/or operational need to occur within, areas containing indigenous biodiversity.		<u>h. The functional or operational need for the activity to occur within areas of significant indigenous vegetation or significant habitats of indigenous fauna;</u> and
					<u>hi.</u> The appropriateness of any biodiversity offsetting or compensation in accordance with Policy 9 to offset any residual adverse effects that remain
					Amend ECO - P8 as follows:
					Maintain indigenous habitats and ecosystems across the West Coast/Te Tai o Poutini by:
					a.Maintaining, and where appropriate enhancing or restoring the functioning of ecological corridors, linkages, dunes and indigenous coastal vegetation and wetlands;
					b. Minimising <u>Managing</u> adverse effects on, and providing access to, areas of indigenous biodiversity which are significant to Poutini Ngāi Tahu;
					c. Restricting <u>Managing adverse effects arising from</u> the modification or disturbance of coastal indigenous vegetation, dunes, estuaries and wetlands;
					d. Preserving <u>Managing adverse effects on</u> protected wildlife; and
Ecosystems and Indigenous Biodiversity	ECO - P8	Oppose in part	The policy seeks to maintain indigenous biodiversity, however the proposed wording is inconsistent with the Coastal Environment chapter of the West Coast Regional Policy Statement 2020 which also gives effect to the New Zealand Coastal Policy Statement 2010. Wording amendments are proposed to rectify this, and for consistency with wording sought in other submission points.		e.Recognising the benefits of active management of indigenous biodiversity, including voluntary animal and plant pest and stock control and/or formal legal protection.
Ecosystems and Indigenous Biodiversity	ECO - P9				

Ecosystems and Indigenous Biodiversity Ecosystems and Indigenous Biodiversity Ecosystems and Indigenous Biodiversity Ecosystems and Indigenous Biodiversity	ECO - P10 Ecosystems and Indigenous Biodiversity Rules Note: Permitted Activities	Support in part	This policy is supported, however requires amendment to fully give effect to Policy 9.1 of the West Coast Regional Policy Statement.	Amend ECO - P9 as follows: Protect indigenous biodiversity in the coastal environment from inappropriate subdivision, use and development by: a.Avoiding adverse effects on significant indigenous biodiversity; and b.Avoiding, remedying or mitigating other significant adverse effects on <u>other</u> indigenous vegetation, habitats and species within the coastal environment.
Ecosystems and Indigenous Biodiversity	ECO - R1	Support	This permitted activity rule provides for a number of vegetation clearance activities within the West Coast Region, and recognises the unique context associated with the large area of land which is public conservation land. It recognises that Manuka and Kanuka are abundant species that can quickly regenerate where land clearance has occurred, and provides for clearance of previously cleared areas. The ability to clear vegetation within the Grey District which has already identified Significant Natural Areas is also supported. This rule contains a very restrictive vegetation clearance requirement in the coastal environment, which covers large areas of the West Coast Region which are used for various economic activities. The 500m2 clearance rule is considered to be unduly restrictive and unnecessary for the protection of coastal character or indigenous biodiversity. There is no permitted activity clearance for any activities other than residential, network utilities or roads, tracks etc. It is not considered that there is any need to further protect the coastal environment beyond the existing permitted activity provisions in ECO - R1, and there should be no distinguishing between the type of activity subject to the rule.	Retain as notified. Delete ECO - R2. Alternatively, set a higher vegetation clearance activity, such as 2,000m2 and allow any activity (not just residential, network utility, tracks etc) to carry out limited clearance works.
Ecosystems and Indigenous Biodiversity Ecosystems and Indigenous Biodiversity Ecosystems and Indigenous Biodiversity Ecosystems and Indigenous Biodiversity Ecosystems and Indigenous Biodiversity	ECO - R2 Controlled Activities ECO - R3 ECO - R4/SUB - R7 Restricted Discretionary Activities	Oppose		
Ecosystems and Indigenous Biodiversity Ecosystems and Indigenous Biodiversity Ecosystems and Indigenous Biodiversity	ECO - R5 ECO - R6/SUB - R9 Discretionary Activities	Support in part	The restricted discretionary activity status for indigenous vegetation clearance not meeting permitted or controlled activity standards is supported. It is appropriate to limit discretion to matters which the rule seeks to address. However, a matter which should also be considered is the functional and/or operational need of the activity to carry out such vegetation clearance.	Include functional and operational need in ECO - P7 as per relief sought above, and/or amend ECO - R5 as follows: Discretion is restricted to: a.Whether there are other regulations impacting the site that have meant the land is unable to be used for economic rural uses; b.Constraints imposed by functional or operational need of network utilities and critical infrastructure; c.Effects on habitats of any threatened or protected species; d.Effects on the threat status of land environments in category one or two of the Threatened Environments Classification; e.Effects on ecological functioning and the life supporting capacity of air, water, soil and ecosystems; f.Effects on the intrinsic values of ecosystems; g.Effects on recreational values of public land; and h.The matters outlined in Policies ECO - P6 and ECO - P7 ; <u>and</u> i. <u>The functional or operational need for the activity to locate within the area where indigenous vegetation clearance is proposed to occur.</u>
Ecosystems and Indigenous Biodiversity Ecosystems and Indigenous Biodiversity	ECO - R7 ECO - R8/SUB - R15 Non-complying Activities ECO - R9/SUB - R27 ECO - R10 ECO - R11	Support	The discretionary activity status for vegetation clearance within the specified areas is supported	Retain as notified.

Natural Features and Landscapes Section

Natural Features and Landscapes	NFL	Oppose in part	The submitters own land at Ruatapu, and are concerned at the arbitrary nature of the Outstanding Natural Landscape boundary around Lake Mahinapua, which does not appear to follow any logical topographic or vegetation boundaries. The submitters have reasonably progressed plans to undertake mineral extraction on this site, and are concerned that the boundary of the ONL is not accurate and may affect future consenting. It is possible that by the time decisions are made on this Proposed Plan, that consents may have been obtained for the site, which may also impact the extent of the ONL.	Remove the Outstanding Natural Landscape overlay on the planning maps from Lot 1 Deposited Plan 3854, and reflect any consent decisions for this parcel of land when making decisions on the ONL boundary.
Natural Features and Landscapes	Natural Features and Landscapes Overview			
Natural Features and Landscapes	Plantation Forestry			
Natural Features and Landscapes	Other relevant Te Tai o Poutini Plan provisions			
Natural Features and Landscapes	Natural Features and Landscapes Objective			
Natural Features and Landscapes	NFL - O1			
Natural Features and Landscapes	Natural Features and Landscapes Policies			
				Amend NFL - P1 as follows:
				a.Existing land uses and lawfully established activities including existing network utilities, energy activities, agricultural, horticultural and pastoral activities;
				b.Conservation activities;
				c.Recreational activities;
				d.Natural hazard mitigation activities;
				e.Operation, maintenance and upgrade of renewable electricity generation facilities;
				f.Operation, maintenance and upgrading of network infrastructure;
				g.Upgrading and/or new infrastructure and renewable electricity generation facilities where there is a functional need for it to be located in these areas;
				h.Poutini Ngāi Tahu uses; or
				i.The alteration, maintenance or removal of existing buildings or structures;
Natural Features and Landscapes	NFL - P1	Support in part	This policy is supported as it seeks to provide for activities to locate within outstanding natural landscapes, however also should recognise the fixed-in-location nature and functional or operational need of activities to sometimes locate within these areas.	<u>j. Activities with a functional or operational need to locate within these areas.</u>
Natural Features and Landscapes	NFL - P2	Support	This policy is supported because it recognises that sometimes adverse effects are not possible to avoid, but provides for adverse effects to be remedied, mitigated or offset.	Retain as notified.
				Amend NFL P3 as follows:
				Recognise that there are settlements, farms, <u>minerals extraction, exploration and prospecting</u> , and infrastructure located within outstanding natural landscapes or outstanding natural features and provide for new activities and existing uses in these areas where the values that contribute to the outstanding natural landscape or feature are not adversely affected.
Natural Features and Landscapes	NFL - P3	Support in part	This policy is supported, however it should also include minerals extraction, exploration and prospecting.	
Natural Features and Landscapes	NFL - P4			Amend NFL P4 as follows:
				Minimise adverse effects on outstanding natural landscapes and outstanding natural features by considering the following matters when assessing proposals for land use or subdivision:
				a.The scale of modification to the landscape;
				b.Whether the proposal is located within a part of the outstanding natural feature or outstanding natural landscape that has capacity to absorb change;
				c.Whether the proposal can be visually integrated into the landscape and whether it would break the skyline or ridgelines;
				d.The temporary <u>short term</u> or permanent nature of any adverse effects;
Natural Features and Landscapes	NFL - P5	Support in part	This policy is supported, however should be amended to include consideration of short term, in addition to temporary, effects. Minerals extraction activities often generate relatively short term effects, which are different to temporary or permanent and require consideration in the context of landscape change.	
Natural Features and Landscapes	NFL - P6			
Natural Features and Landscapes	NFL - P7			
Natural Features and Landscapes	Permitted Activities			
Natural Features and Landscapes	NFL - R1			

Natural Features and Landscapes	NFL - R2			
Natural Features and Landscapes	NFL - R3			
Natural Features and Landscapes	NFL - R4			
Natural Features and Landscapes	NFL - R5			
				Amend NFL - R6 as follows:
				<u>Earthworks, excluding minerals extraction, exploration and prospecting activities</u> , within an Outstanding Natural Landscape described in Schedule Five or Outstanding Natural Feature described in Schedule Six ...
			Because the definition of Earthworks does not specifically exclude minerals extraction, exploration and prospecting, this rule would apply to these activities. This is not considered necessary, because other provisions already adequately provide for these activities to be appropriately assessed without adding another rule.	Alternatively, amend the definition of earthworks to specifically exclude minerals extraction, exploration and prospecting activities so that these rules do not apply to these activities.
Natural Features and Landscapes	NFL - R6	Oppose in part		
Natural Features and Landscapes	NFL - R7			
Natural Features and Landscapes	NFL - R8			
Natural Features and Landscapes	Controlled Activities			
Natural Features and Landscapes	NFL - R9			
Natural Features and Landscapes	NFL - R10			
Natural Features and Landscapes	Restricted Discretionary Activities			
Natural Features and Landscapes	NFL - R11			
Natural Features and Landscapes	NFL - R12			
Natural Features and Landscapes	Discretionary Activities			
Natural Features and Landscapes	NFL - R13			
Natural Features and Landscapes	NFL - R14			
Natural Features and Landscapes	NFL - R15			
Public Access Section				
Natural Character and Margins of Waterbodies Section				
Natural Character and Margins of Waterbodies	NC			
Natural Character and Margins of Waterbodies	Natural Character and Margins of Waterbodies			
Natural Character and Margins of Waterbodies	Overview			
Natural Character and Margins of Waterbodies	Natural Character and the Margins of Waterbodies Objectives			
Natural Character and Margins of Waterbodies	NC - O1	Support	This objective provides for activities to occur, provided adverse effects are avoided or mitigated.	Retain as notified.
Natural Character and Margins of Waterbodies	NC - O2			
				Amend NC O3 as follows:
Natural Character and Margins of Waterbodies	NC - O3	Support in part	This objective recognises the functional need of some activities to occur within the margin of lakes, rivers and wetlands, however also should recognise that some activities also have an operational need to locate within these environments.	To provide for activities which have a functional <u>or operational</u> need to locate in the margins of lakes, rivers and wetlands in such a way that the impacts on natural character are minimised.
Natural Character and Margins of Waterbodies	Natural Character and the Margins of Waterbodies Policies			
Natural Character and Margins of Waterbodies	NC - P1			Amend NC - P2 as follows:
Natural Character and Margins of Waterbodies	NC - P2	Support in part	This policy recognises the functional and/or operational need of some activities to occur within margins of waterbodies and provides for them to occur. As the submission seeks that minerals extraction activities are not covered by the definition of earthworks, additional wording is sought to provide for these activities which also have a functional or operational need to occur within the margins of waterbodies.	Provide for indigenous vegetation removal, <u>minerals extraction, exploration and prospecting activities</u> and earthworks within riparian margins of lakes, rivers and wetlands where significant adverse effects on natural character are minimised as far as practicable and: Amend NC - P3 as follows:
Natural Character and Margins of Waterbodies	NC - P3	Support in part	This policy recognises the functional need of some activities to occur within the margin of lakes, rivers and wetlands, however also should recognise that some activities also have an operational need to locate within these environments.	Provide for buildings and structures within riparian margins of lakes, rivers and wetlands where these: a. Have a functional <u>or operational</u> need for their location; and
Natural Character and Margins of Waterbodies	NC - P4			

Natural Character and Margins of Waterbodies	NC - P5			
Natural Character and Margins of Waterbodies	Natural Character and the Margins of Waterbodies Rules			
Natural Character and Margins of Waterbodies	Note:			
Natural Character and Margins of Waterbodies	Permitted Activities			
Natural Character and Margins of Waterbodies	NC - R1			
Natural Character and Margins of Waterbodies	NC - R2			Amend NC - R3 as follows:
				Indigenous Vegetation Clearance and Earthworks <u>excluding minerals extraction, exploration and prospecting activities</u> , not meeting the Permitted Activity Rules
				Activity Status Discretionary
				Alternatively, amend the definition of earthworks to specifically exclude minerals extraction, exploration and prospecting activities so that these rules do not apply to these activities.
Natural Character and Margins of Waterbodies	NC - R3	Oppose in part	Because the definition of Earthworks does not specifically exclude minerals extraction, exploration and prospecting, this rule would apply to these activities. This is not considered necessary, because other provisions already adequately provide for these activities to be appropriately assessed without adding another rule.	
Natural Character and Margins of Waterbodies	Discretionary Activities			
Natural Character and Margins of Waterbodies	NC - R3			
Natural Character and Margins of Waterbodies	NC - R4			
Natural Character and Margins of Waterbodies	NC - R5			
Financial Contributions Section				
Subdivision Section				
General District Wide Matters Section				
Activities on the surface of water Section				
Coastal Environment Section				
Coastal Environment	CE			
Coastal Environment	Coastal Environment			
				Amend the overview as follows:
				The narrow strip of land between the mountains and the sea in the West Coast/Te Tai o Poutini means that most of the community lives on or near the coast - with three of the four major towns and many small settlements being located on or near the coast. <u>A significant proportion of activities also occur within the coastal environment, some have a functional or operational need to occur there, and the coastal environment is therefore vital to providing for the economic well-being of the region.</u>
Coastal Environment	Overview	Support in part	This overview recognises that due to the topography of the West Coast Region, many people live within the coastal environment. The overview should also recognise that a significant amount of economic activity also has to occur within the coastal environment, some of which has a functional and operational need to locate within this environment, such as mineral sands extraction.	
Coastal Environment	Coastal Environment Objectives			
Coastal Environment	CE - O1	Support	This objective recognises that many people in the West Coast region derive benefit from the coastal environment, and that the coastal environment covers large areas of land which is used for vital economic activities.	Retain as notified.
Coastal Environment	CE - O2			
				Amend CE - O3 as follows:
				To provide for activities which have a functional <u>or operational</u> need to locate in the coastal environment in such a way that the impacts on natural character, landscape, natural features, access and biodiversity values are minimised.
Coastal Environment	CE - O3	Support in part	This objective recognises the functional need of some activities to occur within the coastal environment, however also should recognise that some activities also have an operational need to locate within these environments. The New Zealand Coastal Policy Statement recognises that activities "have a functional need to locate and operate within the coastal environment" and it is considered that the Proposed Plan should also provide for this.	
Coastal Environment	Coastal Environment Policies			
Coastal Environment	CE - P1			

Coastal Environment	CE - P2			Amend CE - P3 as follows: Only allow new subdivision, use and development within areas of outstanding and high coastal natural character, outstanding coastal natural landscapes and outstanding coastal natural features where: a.The elements, patterns, processes and qualities that contribute to the outstanding or high natural character or landscape are maintained; b.Significant adverse effects on natural character, natural landscapes and natural features, and adverse effects on areas of significant indigenous biodiversity, areas of outstanding natural character and outstanding natural landscapes and features are avoided; c.The development is of a size, scale and nature that is appropriate to the environment; d.It is for a Poutini Ngāi Tahu cultural purpose; or e.It is <u>National Grid infrastructure</u> an activity that has a functional and operational need to locate in these areas.
Coastal Environment	CE - P3	Support in part	This policy recognises the functional and operational need of National Grid activities to occur within identified character areas in the coastal environment, however also should recognise that there are other activities which also have an operational need to locate within these environments. The New Zealand Coastal Policy Statement recognises that activities "have a functional need to locate and operate within the coastal environment" and it is considered that the Proposed Plan should also provide for this, not just for the National Grid.	
Coastal Environment	CE - P4	Support	This policy provides for existing farming activities within areas of outstanding and high natural coastal character and is supported.	Retain as notified.
Coastal Environment	CE - P5	Support	This policy recognises the functional and operational need for buildings and structures within the coastal environment.	Retain as notified.
Coastal Environment	CE - P6			
Coastal Environment	CE - P7			
Coastal Environment	CE - P8			
Coastal Environment	Coastal Environment Rules			
Coastal Environment	Note:			
Coastal Environment	Permitted Activities			
Coastal Environment	CE - R1			
Coastal Environment	CE - R2			
Coastal Environment	CE - R3			
Coastal Environment	CE - R4	Oppose	The coastal environment encapsulates vast areas of the West Coast Region, which are utilised for economic activities. The proposed floor area and height limits are considered unduly restrictive, and a significant departure from what has previously been considered appropriate in the coastal environment previously, particularly in an agricultural context. Previously, most District Plans allowed for moderately sized agricultural buildings, and the Proposed Plan should also provide for this.	Delete Section 2 of CE-R4 entirely, or alternatively allow an increased gross floor area and height limit which is in line with what is permitted in the current District Plans.
Coastal Environment	Permitted Activities within the High Coastal Natural Character Overlay			
Coastal Environment	CE - R5			
Coastal Environment	CE - R6			
Coastal Environment	CE - R7			
Coastal Environment	Permitted Activities within the Outstanding Coastal Environment Area			
Coastal Environment	CE - R8			
Coastal Environment	CE - R9			
Coastal Environment	CE - R10			
Coastal Environment	CE - R11			
Coastal Environment	Controlled Activities			
Coastal Environment	CE - R12			
Coastal Environment	Restricted Discretionary Activities			
Coastal Environment	CE - R13			
Coastal Environment	CE - R14			
Coastal Environment	CE - R15			
Coastal Environment	CE - R16			
Coastal Environment	CE - R17			
Coastal Environment	CE - R18			
Coastal Environment	Discretionary Activities			
Coastal Environment	CE - R19			
Coastal Environment	CE - R20			
Coastal Environment	CE - R21			
Coastal Environment	Non-complying Activities			
Coastal Environment	CE - R22			

Earthworks Section

Earthworks	EW			
Earthworks	Earthworks			
Earthworks	Overview			
Earthworks	Earthworks Objectives			
			This objective is supported, however it is noted that the submission seeks for minerals extraction, exploration and prospecting activities to be excluded from the definition of earthworks.	
Earthworks	EW - O1	Support		Retain as notified.
Earthworks	Earthworks Policies			
				Amend EW - P1 as follows:
				Enable temporary and small scale earthworks for the subdivision, use and development of land, the provision of utilities, and hazard mitigation, while managing those with the potential to create significant adverse effects.
Earthworks	EW - P1	Support in part	This policy gives effect to EW - O1, however should enable all earthworks, instead of just temporary or small scale earthworks.	
Earthworks	EW - P2			
Earthworks	EW - P3			
Earthworks	EW - P4			
Earthworks	Earthworks Rules			
Earthworks	Note:			
Earthworks	Permitted Activities			
				Amend EW - R1 as follows:
				All Permitted activities must comply with the following relevant standards.
				Earthworks must not exceed a maximum depth or height above ground level of 1.5m measured vertically within 1.5m of a boundary except where these are undertaken by a network utility operator for the purpose of:
				Pole foundations;
				Backfilled trenches; or
				Installation of services by trenchless methods such as directional drilling;
				All fill must consist of cleanfill material <u>except for any vegetative matter which is being used as fill on the same site;</u>
Earthworks	EW - R1	Support in part	Earthworks are permitted provided that all fill consists of cleanfill material. When mining, vegetative matter is removed from the surface of extraction areas, and this vegetative matter will often be spread with topsoil over the remediated areas. If the definition of earthworks includes minerals extraction, exploration and prospecting, this will capture mining activities. It is suggested that the spreading of vegetative matter is provided for within this permitted activity rule. Because the definition of Earthworks does not specifically exclude minerals extraction, exploration and prospecting, this rule would apply to these activities. This is not considered necessary, because other provisions already adequately provide for these activities to be appropriately assessed without adding another rule.	Amend EW - R2 as follows:
Earthworks	EW - R2	Support in part		EW - R2 Earthworks <u>excluding minerals extraction, exploration and prospecting activities</u> - All Zones
Earthworks	EW - R3			
				Amend EW - R4 as follows:
				Earthworks <u>excluding minerals extraction, exploration and prospecting activities</u> 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
Earthworks	EW - R4	Support in part	Because the definition of Earthworks does not specifically exclude minerals extraction, exploration and prospecting, this rule would apply to these activities. This is not considered necessary, because other provisions already adequately provide for these activities to be appropriately assessed without adding another rule.	
Earthworks	EW - R5			
Earthworks	EW - R6	Oppose	This rule permits earthworks within the Minerals Extraction and Buller Coalfield Zones. Control over earthworks separately is not considered necessary, as the zone provisions adequately provide for consideration of these activities.	Delete EW - R6
Earthworks	Restricted Discretionary Activities			
Earthworks	EW - R7			
				Amend EW - R8 as follows:
Earthworks	EW - R8	Support in part	Because the definition of Earthworks does not specifically exclude minerals extraction, exploration and prospecting, this rule would apply to these activities. This is not considered necessary, because other provisions already adequately provide for these activities to be appropriately assessed without adding another rule.	EW - R8Earthworks <u>excluding minerals extraction, exploration and prospecting activities</u> in any Zone not meeting Permitted Activity standards
Light Section				
Light	LIGHT			
Light	Light			
Light	Overview			

Light Light	Light Objectives LIGHT - O1			Amend LIGHT - O2 as follows:
Light Light	LIGHT - O2 Light Policies	Oppose in part	This policy requires protection of views of the night sky, which is not always possible while providing for operational lighting requirements. There are only certain areas where there is a need to protect views of the night sky, however this policy would apply everywhere.	Artificial outdoor lighting is located, designed and operated to maintain the character and amenity values within zones, so that it does not adversely affect the health and safety of people, the safe operation of the transport network, protects views of the night sky , the habitats and ecosystems of nocturnal native fauna and the species themselves.
Light	LIGHT - P1	Oppose in part	The wording of this policy is inconsistent with the corresponding objective. Some minor amendments are sought to rectify this inconsistency.	Amend LIGHT - P1 as follows: Provide for the use of artificial outdoor lighting that: a.Allows people and communities to enjoy and use sites and facilities during night time hours and contributes to the security and safety of private and public spaces; b.Maintains the character and amenity values of the zone and surrounding area; c.Supports the social, cultural, and economic wellbeing or health and safety of people and communities, including road safety; d.Minimises sky glow and light spill; and e. Protects <u>Minimises the adverse effects on</u> the health and well-being of people and ecosystems.
Light Light Light Light Light	LIGHT - P2 LIGHT - P3 Light Rules Note: Permitted Activities	Oppose in part	The submission seeks amendments to LIGHT O2 which relates to the requirement to protect views of the night sky. As previously noted, it is not always necessary to protect these views and doing so could affect operational requirements. An amendment is suggested to this policy to align with the amendments sought to O2.	Amend LIGHT - P2 as follows: Control the intensity, location and direction of any artificial outdoor lighting to: a.Ensure that any artificial outdoor lighting avoids conflict with existing light sensitive areas and uses; b.Internalise light spill within the site where the outdoor lighting is located; c.Minimises adverse effects on views of the night sky and intrinsically dark landscapes including in areas of outstanding coastal natural character;
Light	LIGHT - R1	Oppose	This rule requires the discretion of the relevant territorial authority to assess compliance, and is unnecessary if compliance with the relevant zone rules is achieved.	Delete LIGHT - R1 Amend LIGHT - R2 as follows: Where: 1.Outdoor artificial lighting must not exceed the following vertical or horizontal light levels: a.7.00am – 10.00pm: 25 Lux; b.10.00pm – 7.00am: 10 Lux in the PORTZ – Port Zone <u>MINZ - Mineral Extraction Zone</u> ; and c.10.00pm - 7am: 5 Lux in the TCZ - Town Centre, MUZ - Mixed Use, COMZ - Commercial, HOSZ - Hospital, STADZ - Stadium, AIRPZ - Airport and all INZ - Industrial Zones; d. All hours - 25 Lux in the PORTZ - Port Zone
Light	LIGHT - R2	Oppose	This rule has a particularly restrictive Lux limit for lighting after 10pm in industrial zones, which is considered inappropriate. In the Grey District, Commercial and Industrial limits are currently 10 lux, in Westland the District plan permits 10 lux in Hokitika and the Buller District Plan permits 10 lux in all zones. The night time Port Zone limit is also considered unduly restrictive and potentially would create an unsafe working environment. The Minerals Extraction Zones should also allow for 10 lux spill 24 hours of the day. If the Minerals Extraction Zone is not included within LIGHT - R2, it will default to LIGHT - R4 which is highly restrictive.	Amend LIGHT - R3 as follows: Artificial Outdoor Lighting in the NOSZ - Natural Open Space Zone, SETZ - PREC 2 - Settlement Zone - Coastal Settlement Precinct, and in All Zones where the site falls <u>lighting is located</u> within the Outstanding Coastal Natural Character Overlay
Light	LIGHT - R3	Amend	This rule requires adherence to a very restrictive lux limit when a site is within the Outstanding Coastal Natural Character overlay. This could be overly prohibitive for large sites where only part of the site might be within this overlay. Wording amendments are suggested to ensure that lighting limits only apply to lighting within the overlay to allow for other permitted activity provisions to prevail on parts of the site not subject to the overlay.	

Light	LIGHT - R4	Oppose in part	This rule introduces a very stringent lux limit for night time lighting in all zones that are not covered by LIGHT - R2 or LIGHT - R3, which is in excess of what is required by the current operative District Plans. The least permissive current plan in terms of lighting is the Grey District Plan which permits 2.5 lux in the Rural Environmental Area. The Proposed Plan should not be more stringent than this in areas that are not considered particularly sensitive to lighting. A limit which is consistent with the current plans generally is sought.	Amend LIGHT - R4 as follows: Where: 1. Outdoor artificial lighting must not exceed the following vertical or horizontal light levels: a. 7:00am—10:00pm: 10 Lux; and b. 10:00pm—7:00am: 2 Lux;
Light	Restricted Discretionary Activities			
Light	LIGHT - R5			
Light	Discretionary Activities			
Light	LIGHT - R6			
Noise Section				
Noise	NOISE			
Noise	Noise			
Noise	Overview			
Noise	Noise Objectives			
Noise	NOISE - O1			
Noise	NOISE - O2			
Noise	NOISE - O3			
Noise	Noise Policies			
Noise	NOISE - P1			
Noise	NOISE - P2			
Noise	NOISE - P3			
Noise	NOISE - P4			
Noise	Noise Rules			
Noise	Note:			
Noise	Permitted Activities			
Noise	NOISE - R1			
Noise	NOISE - R2	Support in part	The submitters support NOISE-R2. The submitters support in particular the inclusion of sub-paragraph 7., as it accords with the relief sought in the Transport Chapter seeking removal of amenity effects from consideration. However, the submitters do not consider there is a justification for the exemption to apply only to emissions ' <i>as part of or compatible with a normal residential activity</i> '. Roads are not only designed for residential traffic. The current District Plans provide for road noise to occur as a permitted activity, and the submitters seek the same info.	Amend NOISE - R2 as follows: Where the following activities are exempted from meeting Zone noise standards: ... 7. Vehicles being driven on a road (within the meaning of Section 2(1) of the Transport Act 1998), or within a site as part of or compatible with a normal residential activity; ...
Noise	NOISE - R3			
Noise	NOISE - R4			
Noise	NOISE - R5			
Noise	NOISE - R6	Support in part	The submitters support the inclusion of appropriate noise standards. However, they do not consider there is an appropriate justification to limit the weekend/public holiday daytime hours to 8:00am to 8:00pm in the General Rural and Open Space Zones in particular. A consistent time is sought for every day of the week.	Amend NOISE - R6 as follows: Where: 1.Noise generated by any activity shall not exceed the following noise limits at any point within the notional boundary of any sensitive activity within any site receiving noise: a.7:00am to 10:00pm Monday to Sunday Friday and 8:00am to 8:00pm-weekends and public holidays: 55 dB LAeq (15 min) b.10:00pm to 7:00am Monday to Sunday Friday and 8:00pm to 8:00am-weekends and public holidays: 45 dB LAeq (15min) c.10:00pm to 7:00am all days - 75 dB LAFmax
Noise	NOISE - R7			
Noise	NOISE - R8			
Noise	NOISE - R9	Support	WMS support reliance on NZS 6809: 1999 Acoustics Port Noise Management and Land Use Planning.	Retain as notified
Noise	NOISE - R10			
Noise	NOISE - R11	Support	The submitters support the inclusion of an appropriate noise standard for the Mineral Extraction Zone.	Retain as notified.
Noise	Restricted Discretionary Activities			
Noise	NOISE - R12			
Noise	NOISE - R13			
Signs Section				

Temporary Activities Section

PART 3 - AREA-SPECIFIC MATTERS Section

ZONES Section

Open Space and Recreation Zones Section

Open Space and Recreation Zones Open Space and Recreation Zones Open Space and Recreation Zones Open Space and Recreation Zones	Open Space and Recreation Zones OSRZ Open Space and Recreation Zones Overview	Oppose	The Proposed Plan includes Open Space and Recreation Zones. These have been placed over public conservation land in addition to recreational land such as parks in urban areas. The need for an Open Space Zone over rural public conservation land is not considered necessary. Where Open Space Zones are proposed over rural public conservation land, the submission seeks a General Rural Zone instead of the proposed Open Space Zones.	In the Planning Maps, replace the Open Space Zones with General Rural Zone on rural public conservation land
Open Space and Recreation Zones Open Space and Recreation Zones	OSRZ - Open Space and Recreation Zones Objectives OSRZ - O1 OSRZ - O2 OSRZ - Open Space and Recreation Zones Policies OSRZ - P1 OSRZ - P2 OSRZ - P3 OSRZ - P4 OSRZ - P5 OSRZ - P6 OSRZ - P7 OSRZ - P8	Support in part	The overview of the Open Space Zone notes that minerals extraction can occur within the Open Space Zones. This is supported.	Retain the following wording: "The nature of the West Coast, with its extensive mineral deposits, combined with 84% of the land area being located in public conservation estate, means that provision is also made for mineral extraction within the Open Space Zone."
Open Space and Recreation Zones Open Space and Recreation Zones Open Space and Recreation Zones Open Space and Recreation Zones Open Space and Recreation Zones	OSRZ - P9 OSRZ - P10 Open Space Zone OSRZ - P11 OSRZ - P12 OSRZ - P13	Support in part	This policy seeks to provide for a range of activities, and provides for minerals extraction, however the wording could be improved.	Amend OSRZ - P9 as follows: Provide for the range of purposes where compatible with the open space values including: a.The ongoing operation and appropriate management of cemeteries; b.Camping opportunities at rivers, lakes and coastal areas where this is compatible with the values of the open space; c.Gravel and shingle extraction for roading networks and other local purposes; d.Quarries for rock; e.Pastoral farming including grazing as a management tool; f.Mineral extraction , <u>exploration and prospecting</u> of resources where <u>there is a functional or operational need to locate there</u> these are limited in their location ; and g.Water supply and drainage networks where this supports local community needs.

			Amend OSRZ - P14 as follows:
			Provide for mineral extraction activities within the OSZ - Open Space Zone where:
			a. Impacts on open space and recreation values of the site are minimised;
			b. This is provided for within any Open Space Management Plan for the area;
			c. Adverse effects on open space and recreation values and the environment are avoided, mitigated, remedied, offset or compensated;
			d. Sites are rehabilitated at the end of the mineral extraction activity to enable the land to be used for an appropriate activity.
Open Space and Recreation Zones	OSRZ - P14	Support in part	This policy specifically provides for minerals extraction activities, however contains duplication of both wording and regulation. It is not necessary to rely on an Open Space Management Plan to determine whether an activity is appropriate, because this is managed through a separate permissions process and does not belong in the Proposed Plan.
Open Space and Recreation Zones	Sport and Active Recreation Zone		
Open Space and Recreation Zones	OSRZ - P15		
Open Space and Recreation Zones	OSRZ - P16		
Open Space and Recreation Zones	OSRZ - P17		
Open Space and Recreation Zones	Natural Open Space Zone		
Open Space and Recreation Zones	OSRZ - P18		
Open Space and Recreation Zones	OSRZ - P19		
Open Space and Recreation Zones	OSRZ - P20		
Natural Open Space Zone Section			
Open Space Zone Section			
Open Space Zone	OSZ		
Open Space Zone	Open Space Zone		
			Amend the Overview as follows:
		Support in part	The overview of the Open Space Zone notes that minerals extraction can occur within the Open Space Zones. This is supported but there appears to be a word missing. And amendment is suggested.
Open Space Zone	Overview		In some cases they <u>are</u> also the locations for quarrying and mineral extraction before the land is remediated for other open space uses.
Open Space Zone	OSZ - Open Space Zone Rules		
Open Space Zone	Note:		
Open Space Zone	Permitted Activities		
Open Space Zone	OSZ - R1		
Open Space Zone	OSZ - R2		
Open Space Zone	OSZ - R3		
Open Space Zone	OSZ - R4		
Open Space Zone	OSZ - R5		
Open Space Zone	OSZ - R6		
Open Space Zone	OSZ - R7		
Open Space Zone	OSZ - R8		
Open Space Zone	OSZ - R9		
Open Space Zone	OSZ - R10		
Open Space Zone	OSZ - R11		
Open Space Zone	OSZ - R12		
Open Space Zone	Controlled Activities		
Open Space Zone	OSZ - R13		
Open Space Zone	Restricted Discretionary Activities		
Open Space Zone	OSZ - R14		
Open Space Zone	OSZ - R15		
Open Space Zone	OSZ - R16		
Open Space Zone	OSZ - R17		
Open Space Zone	OSZ - R18		
			This rule classifies mineral extraction, exploration and prospecting as a restricted discretionary activity. This activity status is considered appropriate given the recognition in the objectives and policies and overview text, which recognises that minerals are located within open space and recreation zones.
Open Space Zone	OSZ - R19	Support	Retain as notified.
Open Space Zone	OSZ - R20		
Open Space Zone	Discretionary Activities		
Open Space Zone	OSZ - R21		

Open Space Zone	OSZ - R22	Support	This rule classifies mineral extraction, exploration and prospecting as a discretionary activity within specific overlay areas. This activity status is considered appropriate given the recognition in the objectives and policies and overview text, which recognises that minerals are located within open space and recreation zones.	Retain as notified.
Open Space Zone	OSZ - R23			
Open Space Zone	Non-complying Activities			
Open Space Zone	OSZ - R24			
Open Space Zone	OSZ - R25			
Open Space Zone	OSZ - R26			
Sport and Active Recreation Zone Section				
Commercial and Mixed Use Zones Section				
Commercial Zone Section				
Mixed Use Zone Section				
Neighbourhood Centre Zone Section				
Town Centre Zone Section				
Industrial Zones Section				
General Industrial Zone Section				
Light Industrial Zone Rules Section				
Residential Zones Section				
General Residential Zone Section				
Large Lot Residential Zone Section				
Medium Density Residential Zone Section				
Rural Zones Section				
Rural Zones	Rural Zones			
Rural Zones	RURZ			
Rural Zones	Rural Zones - Objectives and Policies			
Rural Zones	Overview			
Rural Zones	Note with Regard to Plantation Forestry			
Rural Zones	Rural Zones Objectives			Amend RURZ - O1 as follows:
Rural Zones	RURZ - O1	Support in part	This objective is enabling of activities in the rural zones, however wording could be improved, and should refer to primary production which is defined in the National Planning Standards 2019.	"To provide for a range of activities, uses and developments, <u>including primary production</u> , that maintain the amenity and rural character values of the rural environment, while retaining highly productive land <u>for and</u> rural activities, and supporting a productive rural working environment."
Rural Zones	RURZ - O2			
Rural Zones	RURZ - O3			
Rural Zones	RURZ - O4			
Rural Zones	RURZ - O5	Support in part	This objective recognises the extraction of mineral resources occurs in the rural zone and should be supported, however wording amendments are suggested to improve this objective. Many mineral extraction activities within the West Coast Region occur outside of minerals extraction zones and so the Proposed Plan should provide for these activities to occur in rural zones.	Amend RURZ - O5 as follows: To support <u>provide for</u> the use and extraction of mineral resources located within the rural environment, recognising that mineral resources are widespread, and that provided adverse effects are minimised <u>managed</u> and rehabilitation of land occurs following mineral extraction, mineral extraction can be appropriate in a range of locations.
Rural Zones	RURZ - O6			
Rural Zones	Rural Zones Policies	Amend	The submitter notes that the land surrounding Jackson Bay Port has not been zoned Port Zone, and has been zoned Settlement Zone (Coastal Settlement Precinct) instead. The submitters, subject to discussions with the Council and landowners, have sought that the areas used for port activities are zoned Port Zone. However if this relief is not accepted, or the Council and/or landowners are against rezoning, the Settlement Zone and associated Rural policies should appropriately provide for port activities at Jackson Bay. An additional policy is sought to provide for this.	Add a new Rural Zones Policy as follows: <u>Enable the efficient operation, use and development of Jackson Bay Port by providing for port activities within the settlement of Jackson Bay.</u>
Rural Zones	Rural Amenity and Character			

Rural Zones	RURZ - P1	Support	This policy supports a wide range of activities, which includes minerals extraction. The policy is supported.	Retain as notified.
Rural Zones	RURZ - P2			Amend RURZ - P3 as follows:
Rural Zones	RURZ - P3	Support in part	The policy provides for management of reverse sensitivity effects on certain activities, however this should be extended to all primary production activities. Wording amendments are proposed to rectify this.	Expansion of existing settlements beyond current boundaries should support the existing character and amenity of the settlement and avoid areas of high hazard risk, high natural or Poutini Ngāi Tahu cultural values, or significant agricultural <u>primary</u> production values.
Rural Zones	RURZ - P4			
Rural Zones	Production Values			
Rural Zones	RURZ - P5			
Rural Zones	Non-Rural Activities			
Rural Zones	RURZ - P6			
Rural Zones	RURZ - P7			
Rural Zones	RURZ - P8			
Rural Zones	Visitor Economy			
Rural Zones	RURZ - P9			
Rural Zones	RURZ - P10			
Rural Zones	Infrastructure in Rural Areas			
Rural Zones	RURZ - P11			
Rural Zones	RURZ - P12			
Rural Zones	RURZ - P13			
Rural Zones	RURZ - P14			
Rural Zones	Reverse sensitivity			
Rural Zones	RURZ - P15	Support	The policy provides for management of reverse sensitivity effects and is supported.	Retain as notified.
Rural Zones	RURZ - P16			
Rural Zones	Papakāinga housing			
Rural Zones	RURZ - P17			
Rural Zones	Mineral Extraction			
Rural Zones	RURZ - P18	Support in part	This policy provides for adverse effects to be avoided, remedied or mitigated, but should include the ability to offset or compensate to provide for the full effects management hierarchy	Recognise that mineral resources are fixed in location and enable mineral extraction activities provided adverse effects are avoided, remedied, or mitigated, <u>offset or compensated for</u> .
				Amend RURZ - P18 as follows:
				Amend RURZ - P19 as follows:
				Manage conflicts between mineral extraction activities and other land uses by ensuring that:
				a. Standards to <u>manage adverse effects</u> minimise impacts on the amenity, rural character and natural values of rural areas are met; and
				b. Activities that are incompatible with the effects of mineral extraction activities are not established close to existing mineral extraction activities.
Rural Zones	RURZ - P19	Support in part	This policy is supported, however amendments are sought for consistency	
Rural Zones	RURZ - P20			
Rural Zones	RURZ - P21	Support	This policy requires the provision of adequate information to assess effects and is supported.	Retain as notified.
Rural Zones	RURZ - P22	Support	This policy requires rehabilitation of land following mineral extraction in an appropriate manner and is supported.	Retain as notified.
Rural Zones	RURZ - P23	Support	This policy supports co-ordination which will avoid duplication of effort in resource consent processes and is supported.	Retain as notified.
Rural Zones	RURZ - P24	Support	This policy supports the creation of Minerals Extraction Zones where the resources are significant and of regional or national importance and is supported.	Retain as notified.

Rural Zones RURZ - P25
 Rural Zones Airfields and Helipads
 Rural Zones RURZ - P26
 Rural Zones RURZ - P27
 Rural Zones RURZ - P28
 Rural Zones GRUZ - PREC1 - Community Living Precinct Policy
 Rural Zones GRUZ - PREC1 - P1
 Rural Zones SETZ - PREC2 - Settlement Centre Precinct Policy
 Rural Zones SETZ - PREC2 - P2
 Rural Zones SETZ - PREC3 - Coastal Settlement Precinct Policy
 Rural Zones SETZ - PREC3- P3
 Rural Zones SETZ - PREC4 - Rural Residential Precinct Policy
 Rural Zones SETZ - PREC4 - P4
 Rural Zones GRUZ - PREC 5 - Highly Productive Land Precinct Policy
 Rural Zones GRUZ - PREC5 - P5

General Rural Zone Section

General Rural Zone GRUZ
 General Rural Zone General Rural Zone - Rules
 General Rural Zone Overview
 General Rural Zone General Rural Zone Rules
 General Rural Zone Note:
 General Rural Zone Permitted Activities
 General Rural Zone GRUZ - R1
 General Rural Zone GRUZ - R2
 General Rural Zone GRUZ - R3
 General Rural Zone GRUZ - R4
 General Rural Zone GRUZ - R5
 General Rural Zone GRUZ - R6
 General Rural Zone GRUZ - R7
 General Rural Zone GRUZ - R8
 General Rural Zone GRUZ - R9
 General Rural Zone GRUZ - R10
 General Rural Zone GRUZ - R11
 General Rural Zone GRUZ - R12
 General Rural Zone GRUZ - R13
 General Rural Zone GRUZ - R14
 General Rural Zone Controlled Activities
 General Rural Zone GRUZ - R15
 General Rural Zone GRUZ - R16
 General Rural Zone GRUZ - R17
 General Rural Zone GRUZ - R18
 General Rural Zone GRUZ - R19
 General Rural Zone Restricted Discretionary Activities
 General Rural Zone GRUZ - R20
 General Rural Zone GRUZ - R21
 General Rural Zone GRUZ - R22
 General Rural Zone GRUZ - R23

Support in part

This policy seeks maintenance of amenity and quality of the environment, however seeks to avoid or mitigate impacts on indigenous biodiversity. The policy does not reflect the full effects management hierarchy. Wording amendments are proposed to rectify this.

Support

This rule provides for minerals exploration and prospecting and is supported.
 This rule provides for minerals extraction as a permitted activity, albeit in limited volumes, and is supported

Support

Amend RURZ - P25 as follows:

RURZ - P25
 Maintain the quality of the environment and amenity of areas surrounding the mineral extraction activities as far as practicable by:

- a.Utilising management, mitigation and rehabilitation plans as a key tool;
- b.Managing dust, noise, vibration, access and lighting to maintain amenity values;
- c.Managing traffic generation impacts on the operation and maintenance of the transport network;
- d. ~~Avoiding or mitigating impacts~~ Managing adverse effects on significant indigenous vegetation and significant habitats of indigenous fauna;

Retain as notified.

Retain as notified.

General Rural Zone	GRUZ - R24	Oppose	Non-rural activities is not defined. Without any definition it is unclear what is sought to be controlled by this rule, and it should be deleted.	Delete GRUZ - R24 Amend GRUZ - R25 as follows: GRUZ - R25 Mineral Extraction , <u>Prospecting and Exploration</u> Activities not meeting Permitted or Controlled Activity Standards ... Discretion is restricted to: a. Management of access, parking and traffic generation; b. Noise, glare, light, dust, blasting and vibration management; c. Hours of operation; d. Hazardous substances and waste management; e. Historic and Poutini Ngāi Tahu cultural heritage requirements; f. Extent and management of earthworks and indigenous vegetation clearance; g. Effects on any threatened fauna or flora or their habitats; h. Design and location of buildings, structures and infrastructure; i. Landscape measures; j. Maintaining public access; k. Effects on riparian margins and water quality ; l. Monitoring, reporting and community liaison requirements; m. Financial contributions and any requirement for bonds; and n. Site rehabilitation and mine closure requirements.
General Rural Zone General Rural Zone General Rural Zone General Rural Zone General Rural Zone General Rural Zone General Rural Zone	GRUZ - R25 GRUZ - R26 Discretionary Activities GRUZ - R27 GRUZ - R28 GRUZ - R29 GRUZ - R30 GRUZ - R31	Oppose in part	Matters of discretion include water quality. This is not a district planning matter and should be addressed through discharge permits sought through regional consenting. In order to be consistent with GRUZ-R11, this rule should apply to minerals prospecting and exploration also.	
General Rural Zone General Rural Zone General Rural Zone General Rural Zone General Rural Zone	GRUZ - R32 GRUZ - R33 Non-complying Activities GRUZ - R34 GRUZ - R35	Oppose	GRUZ - R25 makes minerals extraction a restricted discretionary activity. If amendments are made as suggested to GRUZ-R25 to include minerals prospecting and exploration activities, then this rule becomes superfluous, as the activity status cannot default to discretionary, as GRUZ -R25 refers the plan user to the relevant overlay chapters.	Delete GRUZ-32.
Rural Lifestyle Zone Section				
Settlement Zone Section				
Settlement Zone	SETZ			
Settlement Zone	Settlement Zone			
Settlement Zone	Overview			
Settlement Zone	SETZ - PREC2 - Settlement Centre Precinct			
Settlement Zone	SETZ - PREC3 - Coastal Settlement Precinct			
Settlement Zone	SETZ - PREC 4 - Rural Residential Precinct			
Settlement Zone	Other relevant Te Tai o Poutini Plan provisions			
Settlement Zone	Note with Regard to Plantation Forestry			
Settlement Zone	Rules			
Settlement Zone	Note:			
Settlement Zone	Permitted Activities			
Settlement Zone	SETZ - R1			
Settlement Zone	SETZ - R2			
Settlement Zone	SETZ - R3			
Settlement Zone	SETZ - R4			
Settlement Zone	SETZ - R5			
Settlement Zone	SETZ - R6			
Settlement Zone	SETZ - R7			
Settlement Zone	SETZ - R8			
Settlement Zone	SETZ - R9			
Settlement Zone	SETZ - R10			
Settlement Zone	SETZ - R11			

Settlement Zone	SETZ - R12
Settlement Zone	SETZ - R13
Settlement Zone	SETZ - R14
Settlement Zone	SETZ - R15

Amend SETZ - R16 as follows:

Activity Status Permitted

Where:

1. These are undertaken on lots ~~fronting The Esplanade~~ within the Jackson Bay Port Specific Control Area as follows:

a. On legal road reserve between Mean High Water Springs and the edge of the road carriageway;

b. On the following lots:

i. Sections 208 and 209 TN OF Arawata; and

ii. Sections 8, 9 and 10 TN of Arawata;

2. Permitted Port Activities are limited to the following:

i. Cargo handling, including the loading, unloading, storage, processing and transit of cargo (including fish);

ii. Passenger handling, including the loading, unloading and transit of passengers including passenger or cruise ship terminals;

iii. Port administration;

iv. Facilities for recreational boating;

v. Activities associated with maritime navigation; and

vi. Ancillary buildings, structures, utilities, signs, parking, landscaping, offices and other facilities.

3. Maximum building size is ~~500~~ 200 m²;

4. Maximum building height is ~~10~~ 5 m;

5. Buildings must be setback 1m from the road and internal boundaries; and

6. No building shall project beyond a building envelope defined by a

The submitter supports having more enabling provisions for port activities in Jackson Bay. Elsewhere in this submission the submitters have sought the appropriate recognition of Jackson Bay Port and for it to be listed as critical infrastructure given that it is Regionally Significant Infrastructure in the West Coast Regional Policy Statement. The submitters are therefore seeking, subject to discussions with the Council and landowners, that the area being utilised for port activities is zoned appropriately as Port Zone to enable and provide for the port. This would also enable port activities to be managed in accordance with NOISE - R9. In the event that this submission point is not accepted, or the Council/landowners disagree, the submitters are supportive of a specific rule which allows for port activities to occur. The submitter considers that this area should be demarcated on the planning maps, and considers that (as notified) the rules proposed are too limiting to be supportive of port activities in Jackson Bay. In fact in some instances they are more restrictive than the rules for residential activities (i.e. 5m height limit). Amendments to the rules are sought to appropriately reflect the regional significance of this infrastructure.

Support in part

Settlement Zone	SETZ - R16
Settlement Zone	Controlled Activities
Settlement Zone	SETZ - R17
Settlement Zone	SETZ - R18
Settlement Zone	Restricted Discretionary Activities
Settlement Zone	SETZ - R19
Settlement Zone	SETZ - R20
Settlement Zone	SETZ - R21
Settlement Zone	SETZ - R22
Settlement Zone	SETZ - R23
Settlement Zone	Discretionary Activities
Settlement Zone	SETZ - R24
Settlement Zone	SETZ - R25
Settlement Zone	SETZ - R26
Settlement Zone	SETZ - R27
Settlement Zone	Non-complying Activities
Settlement Zone	SETZ - R28

SPZ - Special Purpose Zones Section

Airport Zone Section

Buller Coalfield Zone Section

Future Urban Zone Section

Hospital Zone Section

Mineral Extraction Zone Section

Mineral Extraction Zone	MINZ
-------------------------	------

Mineral Extraction Zone Mineral Extraction Zone Mineral Extraction Zone	Mineral Extraction Zone Overview Mineral Extraction Zone Objectives	Support in part	The submitters support the inclusion of the Mineral Extraction Zone, which recognises the uniquely high importance of mineral extraction activities to the West Coast Economy, and the wider national and international interest in these high quality mineral sand resources which can support green and clean technologies. The Minerals Extraction Zones that have been mapped do not sufficiently cover mineral extraction activities on the West Coast and should be extended to include the recently consented mineral extraction activity at Okari Road, 9 Mile, which is authorised by resource consents RC210051A and 2021-0091-V1.	Amend the planning maps to include an additional Mineral Extraction Zone over Westland Mineral Sands Co. Ltd's recently consented mining activities are occurring.
Mineral Extraction Zone	MINZ - O1	Support	This objective enables mineral extraction activities in the MINZ and is supported	Retain as notified. Amend MINZ - O2 as follows: To ensure exploration, extraction and processing of minerals within the MINZ - Mineral Extraction Zone minimises manages adverse effects on the environment, the community and the relationship of Poutini Ngāi Tahu with their ancestral lands, sites and areas of significance, water, wāhi tapu and other taonga.
Mineral Extraction Zone Mineral Extraction Zone	MINZ - O2 Mineral Extraction Policies	Support in part	This objective recognises the need to address adverse effects, however a wording amendment is proposed to allow for the full effects management hierarchy.	
Mineral Extraction Zone	MINZ - P1	Support	This policy encourages the recognition of important mineral resources through mineral extraction zones and is supported	Retain as notified.
Mineral Extraction Zone	MINZ - P2	Support	This policy recognises the need to protect mineral resources from reverse sensitivity effects and is supported.	Retain as notified. Amend MINZ - P3 as follows:
Mineral Extraction Zone	MINZ - P3	Support in part	This policy requires rehabilitation of land following mineral extraction, and is supported, however a wording amendment is sought to refer to the best practicable environmental outcome rather than best practice.	To ensure that after mineral extraction, all mine sites in the MINZ - Mineral Extraction Zone are rehabilitated to the best practicable practice environmental standards and to provide for future use and activities appropriate to the area. Amend MINZ - P4 as follows:
Mineral Extraction Zone	MINZ - P4	Support in part	This policy recognises the need to address adverse effects, however a wording amendment is proposed to allow for the full effects management hierarchy.	Maintain the quality of the environment, landscape, ecological values, character and amenity of the areas surrounding the MINZ - Mineral Extraction Zone as far as practicable by: a.Utilising management, monitoring, rehabilitation and mine closure plans as a key tool; b.Managing dust, noise, vibration, access and lighting to maintain amenity values; c.Managing traffic generation, load type and vehicle characteristics on the operation and maintenance of the transport network; d.Managing adverse effects impacts on significant indigenous vegetation and significant habitats of indigenous fauna;
Mineral Extraction Zone	MINZ - P5	Support	This policy provides for adverse effects to be managed using the effects management hierarchy and is supported.	Retain as notified.
Mineral Extraction Zone	MINZ - P6	Support	This policy recognises the need for Poutini Ngai Tahu involvement in certain resource consent processes and is supported.	Retain as notified. Amend MINZ - P7 as follows:
Mineral Extraction Zone	MINZ - P7	Support in part	This policy seeks manage conflicts between activities. A wording amendment is proposed for consistency.	Manage conflicts between mineral extraction activities and other land uses by ensuring that: a.Performance standards to manage adverse effects minimise impacts on the amenity, rural character and natural values of adjacent areas are met; and b.Activities that are incompatible with the effects of mineral extraction and ancillary activities are not established in the MINZ - Mineral Extraction Zone.
Mineral Extraction Zone Mineral Extraction Zone Mineral Extraction Zone Mineral Extraction Zone Mineral Extraction Zone	MINZ - P8 Rules Note: Permitted Activities MINZ - R1	Support	This policy seeks to ensure coordination with the West Coast Regional Council and is supported	Retain as notified.

Mineral Extraction Zone	MINZ - R2	Support in part	This rule seeks to provide for minerals extraction activities where lawfully established, which is generally not required in a District Plan context. It is unclear why this rule is required, and appears to be providing for activities which may already be provided for through the protection of consented activities under section 9 (3)(a) of the Resource Management Act 1991, or existing use rights afforded by section 10 of the Act.	An additional advice note is sought as follows: "This rule does not override the protection of consented activities under Section 9(3)(a) of the Resource Management Act 1991 or existing use rights provided for under Section 10 of the Act."
Mineral Extraction Zone	MINZ - R3			
Mineral Extraction Zone	MINZ - R4	Support	This rule provides for ancillary activities and is supported.	Retain as notified.
Mineral Extraction Zone	MINZ - R5			
Mineral Extraction Zone	Controlled Activities			
Mineral Extraction Zone	MINZ - R6	Support	The activity status for vegetation clearance is supported.	Retain as notified.
Mineral Extraction Zone	Restricted Discretionary Activities			
Mineral Extraction Zone	MINZ - R7	Support	The activity status for mineral extraction activities is supported	Retain as notified.
Mineral Extraction Zone	Discretionary Activities			
Mineral Extraction Zone	MINZ - R8			
Mineral Extraction Zone	Non-complying Activities			
Mineral Extraction Zone	MINZ - R9			
Mineral Extraction Zone	MINZ - R10			
Māori Purpose Zone Section				
Māori Purpose Zone	MPZ			
Māori Purpose Zone	Māori Purpose Zone			
Māori Purpose Zone	Overview			
Māori Purpose Zone	Māori Purpose Zone Objectives			
Māori Purpose Zone	MPZ - O1			
Māori Purpose Zone	MPZ - O2			
Māori Purpose Zone	MPZ - O3	Support	The submitters support this objective which enables appropriate use and development, which can include mineral extraction.	Retain as notified.
Māori Purpose Zone	Māori Purpose Zone Policies			
Māori Purpose Zone	MPZ - P1			
Māori Purpose Zone	MPZ - P2	Support	This policy provides for "other economic activities", which in appropriate circumstances could include minerals extraction	Retain as notified.
Māori Purpose Zone	MPZ - P3			
Māori Purpose Zone	MPZ - P4			
Māori Purpose Zone	MPZ - P5			
Māori Purpose Zone	MPZ - P6			
Māori Purpose Zone	Māori Purpose Zone Rules			
Māori Purpose Zone	Note:			
Māori Purpose Zone	Permitted Activities			
Māori Purpose Zone	MPZ - R1			
Māori Purpose Zone	MPZ - R2			
Māori Purpose Zone	MPZ - R3			
Māori Purpose Zone	MPZ - R4			
Māori Purpose Zone	MPZ - R5			
Māori Purpose Zone	MPZ - R6			
Māori Purpose Zone	MPZ - R7			
Māori Purpose Zone	MPZ - R8			
Māori Purpose Zone	MPZ - R9			
Māori Purpose Zone	MPZ - R10			
Māori Purpose Zone	Restricted Discretionary Activities			
Māori Purpose Zone	MPZ - R11			
Māori Purpose Zone	MPZ - R12			
Māori Purpose Zone	MPZ - R13			
Māori Purpose Zone	MPZ - R14			
Māori Purpose Zone	MPZ - R15			
Māori Purpose Zone	MPZ - R16			
Māori Purpose Zone	MPZ - R17	Oppose	Non-rural activities is not defined. Without any definition it is unclear what is sought to be controlled by this rule, and it should be deleted.	Delete MPZ - R17
Māori Purpose Zone	MPZ - R18			
Māori Purpose Zone	Discretionary Activities			
Māori Purpose Zone	MPZ - R19			
Māori Purpose Zone	MPZ - R20			
Māori Purpose Zone	MPZ - R21			
Māori Purpose Zone	MPZ - R22			

Māori Purpose Zone	MPZ - R23		The submitters have a minerals permit covering part of the Maori Purpose Zone at the Manukaiaua River in South Westland. The submitters are concerned that without specific mineral extraction provisions within this zone, the activity would default to non-complying under MPZ - R24. The submitters believe that mineral extraction should be provided for as a discretionary activity, to enable runanga to benefit from potential future mining access arrangements should they choose to, which could be beneficial for the economic and social well-being of the runanga in this area.	
Māori Purpose Zone Port Zone Section	MPZ - R24	Oppose in part		Provide for minerals extraction as a discretionary activity, rather than defaulting to non-complying as currently is the case under MPZ-R24.
			The submitters support the inclusion of a Port Zone which reflects the regional importance of the West Coast ports. The ports of Westport, Greymouth and Jackson Bay are listed in the West Coast Regional Policy Statement as Regionally Significant Infrastructure. The submitters have interests in all three ports, and support an enabling zone and policy framework which will enable the functional and operational requirements of these ports. The submitters have also sought appropriate recognition of the ports as regionally significant infrastructure through the inclusion of the ports in the definition of Critical Infrastructure.	
			The area of Port Zone identified at the Westport and Greymouth Ports does not reflect the area leased by West Coast Bulk Logistics Limited (a subsidiary of WMS Group) and utilised for port activities. The submitters therefore seek that the Port Zone at the Westport and Greymouth Ports is extended to cover the area leased by West Coast Bulk Logistics Limited (or any other current or future subsidiary of WMS Group). WMS Group will be happy to provide the Committee with a map delineating the leased area at the Westport and Greymouth Ports.	Undertake necessary rezoning to ensure that the areas of the Westport and Greymouth Ports leased by West Coast Bulk Logistics Limited (or any other current or future subsidiary of WMS Group) are zoned Port Zone.
			In addition, the submitters are concerned that there has been no land zoned for port activities at Jackson Bay, despite there being land which is utilised for port-based industrial activities both currently and in the past. It is important to provide for sufficient land to support the functional and operational requirements of Jackson Bay port, both now and in the future.	Subject to discussions with the Council and landowners, rezone land at Jackson Bay surrounding the wharf area where port based industrial activities have operated and continue to operate, including the following land parcels: Section 209 Town of Arawata Section 8 Town of Arawata Section 9-10 Town of Arawata Section 208 Town of Arawata
Port Zone Port Zone	PORTZ Port Zone	Support in part		Amend the Overview as follows: <u>Westport, and Greymouth and Jackson Bay Ports are the major ports on the West Coast/Te Tai o Poutini and are considered critical infrastructure. They are significant connections to the rest of New Zealand/Aotearoa me Te Waipounamu as well as providing the bases for the West Coast/Te Tai o Poutini fishing fleet. The West Coast ports are critical infrastructure because they are essential for local industry, but also have the potential to be used for alternatives to land-based transport and may provide an important lifeline for emergency response to natural distasters.</u>
				The PORTZ - Port Zone applies to the two ports and their surrounds and the zone's purpose is to enable the efficient operation and development of the ports and associated land and activities. Flexibility for the ports to develop and adapt is important. The ports have special operational needs and environmental effects and the special purpose zoning is tailored to address those needs and effects. This includes providing for a degree of operational flexibility subject to environmental considerations.
Port Zone	Overview	Support in part	The submitters support the Overview of the Port Zone, however seek that the Overview includes reference to Jackson Bay, which is also listed in the West Coast Regional listed in the West Coast Regional Policy Statement as Regionally Significant infrastructure. The submitter seeks that the Jackson Bay Port is provided for with appropriate Port Zone area covering current port activities. The submitter also seeks that the Overview recognises the ports as critical infrastructure in accordance with other relief sought, to reflect the fact that they are Regionally Significant Infrastructure in the RPS. The Overview should also recognise the role that the West Coast ports provide in terms of natural hazards resilience and providing alternatives to land based transport.	Essentially the PORTZ - Port Zone has been developed as a type of heavy industrial zone, which recognises Port Activities as the major use for the area. It does, however, provide for other types of activities, but recognises

Port Zone	Port Zone Objectives		The current objective does not sufficiently give effect to the West Coast Regional Policy Statement which identifies the West Coast ports as Regionally Significant Infrastructure. The objective should be amended to enable the safe and efficient operation of West Coast Ports, not manage them.	Amend Objective O1 as follows: Manage <u>Enable the safe and efficient operation of</u> West Coast/Te Tai o Poutini ports to <u>and</u> sustain their current and future potential use and development.
Port Zone Port Zone	PORTZ - O1 PORTZ - O2	Amend		
Port Zone	Port Zone Policies	Amend	The current policies do not recognise that ports have a functional and operational need to locate within the coastal environment and adjacent to/within the Coastal Marine Area. A policy is required to give effect to the New Zealand Coastal Policy Statement, to ensure that the functional and operational need of port activities to locate within this environment is recognised when considering potential adverse effects. The West Coast Regional Policy Statement also recognises this requirement in the Regionally Significant Infrastructure chapter.	Include a new policy as follows: "Recognise the functional and operational needs of activities within the Port Zone, while managing their adverse effects on the surrounding environment." Amend PORTZ - P1 as follows: Enable the efficient operation, use and development of West Coast/Te Tai o Poutini ports. by ensuring incompatible activities or developments do not compromise port operations or development of port and maritime facilities.
Port Zone Port Zone Port Zone Port Zone Port Zone	PORTZ - P1 PORTZ - P2 PORTZ - P3 PORTZ - P4 PORTZ - P5	Amend	The submitter supports the intent of this policy, however it contains two important policy directives which should be separated. The West Coast ports should be enabled, not just with respect to restricting incompatible activities. Ports need to be enabled through both enabling provisions and protection against reverse sensitivity effects.	Add a new Port Zone policy as follows: <u>Ensure incompatible activities or developments do not compromise port operations or development of port and maritime facilities.</u>
Port Zone	PORTZ - P6	Oppose	This policy indicates that standards must be obtained to protect the amenity of the surrounding environment, and does not give effect to the West Coast Regional Policy Statement which seeks to provide for Regionally Significant Infrastructure. The proposed new policy will ensure that effects are managed, while port operations are appropriately enabled given their regional significance. The submitters are concerned about the drafting of the Port Zone rules, which require significant revision to adequately provide for port activities, and remove drafting errors and ultra vires provisions. The specific details of relief sought for these matters are addressed further below, however further revision may be required to adequately address the submitters' concerns.	Delete PORTZ-P6
Port Zone	Port Zone Rules	Oppose in part		

				Amend PORTZ - R1 as follows, and delete Advice Note 2 relating to stormwater:
				Where:
				1.The maximum building height above ground level is 20m;
				2.Maximum site coverage is 80%;
				3.Buildings are setback a minimum:
				i.5m from road boundaries, the rail corridor and any RESZ - Residential Zone or MUZ - Mixed Use Zone boundary; and
				ii.10m from State Highways;
				4.All external storage and car parking areas shall be screened by a 1.8m fence or landscaping so that it is not visible from any adjoining RESZ - Residential Zone boundary or adjoining public place outside of the PORTZ - Port Zone;
				5.Vibration from any site due to blasting shall not exceed a peak particle velocity of 5mm/sec measured in the frequency range 3-12 Hz at the notional boundary of any noise sensitive activity;
				6.Airblast overpressure from blasting shall not exceed a peak sound pressure level of 120 dBC at the notional boundary of any noise sensitive activity;
				7.There shall be no offensive or objectionable dust nuisance at or beyond the PORTZ - Port Zone boundary as a result of the activity;
				8.No noxious or offensive odour shall be detected beyond the PORTZ - Port Zone boundary that the activity occurs in;
				9.The area adjoining the road frontage of all sites, and the side boundary of a site that adjoins a RESZ - Residential, OSRZ - Open Space and Recreation
Port Zone	PORTZ - R1	Oppose in part	This rule contains a number of problematic provisions for port activities, and fails to recognise the regional significance of these operations and limited land resource available to conduct such activities. Section 4 and Section 9 of the rule conflict. This rule requires as a condition that there is no dust nuisance at the Port Zone Boundary. While dust nuisance is often a matter of discretion when considering land use consents required by a District Plan, it would be unusual to have a rule which effectively seeks to limit air discharges. The West Coast Regional Air Plan controls air discharges and the rule is inappropriate. Similarly the West Coast Regional Land and Water Plan is the appropriate plan to control stormwater discharge, and there is no requirement for a stormwater disposal rule in the Proposed Plan. The rule also requires adherence to recession planes (section 11), and this is not limited to residential zone boundaries, but presumably applies to all boundaries, and contains an ultra vires requirement to obtain written approval of a neighbour in order to be a permitted activity. The rule should be amended to only apply to residential zone boundaries, and remove the ultra vires requirement to obtain neighbour's approvals.	
Port Zone	PORTZ - R2			
Port Zone	PORTZ - R3			
Port Zone	PORTZ - R4			
Port Zone	PORTZ - R5	Oppose	This rule contains an ultra vires requirement to obtain confirmation from the District Council that the activity will not impede port function.	Delete PORTZ-R6
Port Zone	Controlled Activities			
Port Zone	PORTZ - R6			
Port Zone	Restricted Discretionary Activities			
				Amend PORTZ - R7 as follows:
				Activity Status Restricted Discretionary
				Where:
				1.The building <u>does not comply with a recession plane as defined in Appendix Two to commence 2.5m above any boundary with a RESZ - Residential Zone projects into the 35 degree recession plane;</u>
				2.All other performance standards for Rule PORTZ - R1 are complied with ; and
				3.Rules NOISE - R8 and LIGHT - R2 are complied with.
				Discretion is restricted to:
				a.Design, height, bulk and location of buildings;
				b. <u>Whether the activity has a functional or operational need to be located within the recession plane;</u> Design and location of parking and access;
				c.Management of hazardous substances in accordance with the objectives and policies of the Hazardous Substances chapter; and
				d.Landscape measures.
Port Zone	PORTZ - R7	Oppose in part	This rule as drafted does not make sense and needs to be revised. There is no explanation as to why the 35 degree recession plane in particular would trigger a separate activity status. The rule only relates to recession plane breaches, however the matters of discretion contain matters which are completely unrelated to recession plane breaches and cross reference to other rules, which have their own activity status for non-compliance. Revisions to the rule are proposed for clarity.	
Port Zone	PORTZ - R8			
Port Zone	PORTZ - R9			
Port Zone	Discretionary Activities			
Port Zone	PORTZ - R10			
Port Zone	PORTZ - R11			
Port Zone	Non-complying Activities			
Port Zone	PORTZ - R12			

Stadium Zone Section

Scenic Visitor Zone Section

Development Areas Section

Designations Section

PART 4 - APPENDICES Section

PART 4 - APPENDICES PART 4 - APPENDICES

Schedules Section

Schedules Schedules

SCHED1A - SCHEDULE OF HISTORIC HERITAGE ITEMS AND AREAS Section

SCHED1B - SCHEDULE OF ARCHEOLOGICAL SITES Section

SCHED2 - SCHEDULE OF NOTABLE TREES Section

SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI Section

SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI SASM 1
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI SASM 2
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI SASM 3
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI SASM 4
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI SASM 5
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI SASM 6
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI SASM 7
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI SASM 8
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI SASM 9
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI SASM 10
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI SASM 11
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI SASM 12
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI SASM 13
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI SASM 14
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI SASM 15
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI SASM 16
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI SASM 17
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI SASM 18

SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI SASM 19

Support in part

Support in part

The submitters support the inclusion of sites and areas of significance to Maori in the Proposed Plan, however are concerned about the accuracy of some sites, and the lack of information supporting the significance of the sites. There does not appear to be an explanation of the categories, and in some instances there are no identified cultural values associated with the site.

This SASM is located within Westland Mineral Sands Co. Ltd's minerals permit, and covers an extensive area marked by an elliptical shape on the planning maps. The accuracy of this SASM is questioned. Westland Mineral Sands Co. Ltd commissioned an extensive archaeological assessment of the consented area, which only identified one small archaeological exclusion zone. The current provisions relating to minerals extraction would make any extension of the mineral extraction activity a non-complying activity. It is important that SASMs are accurately mapped with such provisions being included in the Proposed Plan.

The submitters seek that the identified sites of significance to Maori are reviewed by mana whenua for accuracy and further information is provided on the cultural values associated with each site.

The submitters seek that SASM19 is re-evaluated to provide an accurate area on the planning maps showing the location of the kainga and mahinga kai sites.

SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 20
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 21
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 22
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 23
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 24
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 25
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 26
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 27
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 28
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 29
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 30
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 31
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 32
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 33
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 34
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 35
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 36
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 37
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 38
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 39
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 40
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 41
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 42
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 43
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 44
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 45
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 46
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 47
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 48
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 49
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 50
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 51

SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 52
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 53
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 54
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 55
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 56
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 57
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 58
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 59
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 60
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 61
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 62
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 63
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 64
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 65
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 66
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 67
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 68
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 69
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 70
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 71
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 72
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 73
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 74
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 75
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 76
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 77
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 78
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 79
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 80
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 81
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 82
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 83

SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 84
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 85
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 86
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 87
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 88
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 89
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 90
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 91
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 92
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 93
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 94
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 95
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 96
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 97
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 98
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 99
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 100
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 101
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 102
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 103
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 104
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 105
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 106
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 107
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 108
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 109
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 110
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 111
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 112
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 113
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 114
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 115

SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 116
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 117
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 118
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 119
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 120
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 121
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 122
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 123
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 124
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 125
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 126
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 127
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 128
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 129
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 130
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 131
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 132
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 133
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 134
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 135
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 136
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 137
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 138
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 139
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 140
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 141
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 142
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 143
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 144
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 145
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 146
SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI	SASM 147

SCHED3 - SITES AND AREAS OF SIGNIFICANCE
TO MĀORI SASM 148
SCHED3 - SITES AND AREAS OF SIGNIFICANCE
TO MĀORI SASM 149
SCHED3 - SITES AND AREAS OF SIGNIFICANCE
TO MĀORI SASM 150

SCHED3 - SITES AND AREAS OF SIGNIFICANCE
TO MĀORI SASM 151
SCHED3 - SITES AND AREAS OF SIGNIFICANCE
TO MĀORI SASM 152
SCHED3 - SITES AND AREAS OF SIGNIFICANCE
TO MĀORI SASM 153
SCHED3 - SITES AND AREAS OF SIGNIFICANCE
TO MĀORI SASM 154
SCHED3 - SITES AND AREAS OF SIGNIFICANCE
TO MĀORI SASM 155
SCHED3 - SITES AND AREAS OF SIGNIFICANCE
TO MĀORI SASM 156
SCHED3 - SITES AND AREAS OF SIGNIFICANCE
TO MĀORI SASM 157
SCHED3 - SITES AND AREAS OF SIGNIFICANCE
TO MĀORI SASM 158
SCHED3 - SITES AND AREAS OF SIGNIFICANCE
TO MĀORI SASM 159
SCHED3 - SITES AND AREAS OF SIGNIFICANCE
TO MĀORI SASM 160
SCHED3 - SITES AND AREAS OF SIGNIFICANCE
TO MĀORI SASM 161
SCHED3 - SITES AND AREAS OF SIGNIFICANCE
TO MĀORI SASM 162
SCHED3 - SITES AND AREAS OF SIGNIFICANCE
TO MĀORI SASM 163
SCHED3 - SITES AND AREAS OF SIGNIFICANCE
TO MĀORI SASM 164
SCHED3 - SITES AND AREAS OF SIGNIFICANCE
TO MĀORI SASM 165
SCHED3 - SITES AND AREAS OF SIGNIFICANCE
TO MĀORI SASM 166
SCHED3 - SITES AND AREAS OF SIGNIFICANCE
TO MĀORI SASM 167
SCHED3 - SITES AND AREAS OF SIGNIFICANCE
TO MĀORI SASM 168
SCHED3 - SITES AND AREAS OF SIGNIFICANCE
TO MĀORI SASM 169
SCHED3 - SITES AND AREAS OF SIGNIFICANCE
TO MĀORI SASM 170
SCHED3 - SITES AND AREAS OF SIGNIFICANCE
TO MĀORI SASM 171
SCHED3 - SITES AND AREAS OF SIGNIFICANCE
TO MĀORI SASM 172
SCHED3 - SITES AND AREAS OF SIGNIFICANCE
TO MĀORI SASM 173
SCHED3 - SITES AND AREAS OF SIGNIFICANCE
TO MĀORI SASM 174
SCHED3 - SITES AND AREAS OF SIGNIFICANCE
TO MĀORI SASM 175
SCHED3 - SITES AND AREAS OF SIGNIFICANCE
TO MĀORI SASM 176
SCHED3 - SITES AND AREAS OF SIGNIFICANCE
TO MĀORI SASM 177
SCHED3 - SITES AND AREAS OF SIGNIFICANCE
TO MĀORI SASM 178

Westland Mineral Sands Co. Ltd has a minerals exploration permit in this area, and the current provisions relating to minerals extraction would make mineral extraction a non-complying activity. It is important that SASMs are accurately mapped and associated with cultural values with such provisions being included in the Proposed Plan.

Support in part

The submitters seek that SASM151 is re-evaluated to provide an accurate area on the planning maps which reflects cultural values associated with the site.

SCHED3 - SITES AND AREAS OF SIGNIFICANCE
 TO MĀORI SASM 179
 SCHED3 - SITES AND AREAS OF SIGNIFICANCE
 TO MĀORI SASM 180
 SCHED3 - SITES AND AREAS OF SIGNIFICANCE
 TO MĀORI SASM 181
 SCHED3 - SITES AND AREAS OF SIGNIFICANCE
 TO MĀORI SASM 182
 SCHED3 - SITES AND AREAS OF SIGNIFICANCE
 TO MĀORI SASM 183
 SCHED3 - SITES AND AREAS OF SIGNIFICANCE
 TO MĀORI SASM 184
 SCHED3 - SITES AND AREAS OF SIGNIFICANCE
 TO MĀORI SASM 185
 SCHED3 - SITES AND AREAS OF SIGNIFICANCE
 TO MĀORI SASM 186
 SCHED3 - SITES AND AREAS OF SIGNIFICANCE
 TO MĀORI SASM 187
 SCHED3 - SITES AND AREAS OF SIGNIFICANCE
 TO MĀORI SASM 188
 SCHED3 - SITES AND AREAS OF SIGNIFICANCE
 TO MĀORI SASM 189
 SCHED3 - SITES AND AREAS OF SIGNIFICANCE
 TO MĀORI SASM 190
 SCHED3 - SITES AND AREAS OF SIGNIFICANCE
 TO MĀORI SASM 191
 SCHED3 - SITES AND AREAS OF SIGNIFICANCE
 TO MĀORI SASM 192
 SCHED3 - SITES AND AREAS OF SIGNIFICANCE
 TO MĀORI SASM 193
 SCHED3 - SITES AND AREAS OF SIGNIFICANCE
 TO MĀORI SASM 194
 SCHED3 - SITES AND AREAS OF SIGNIFICANCE
 TO MĀORI SASM 195
 SCHED3 - SITES AND AREAS OF SIGNIFICANCE
 TO MĀORI SASM 196
 SCHED3 - SITES AND AREAS OF SIGNIFICANCE
 TO MĀORI SASM 197
 SCHED3 - SITES AND AREAS OF SIGNIFICANCE
 TO MĀORI SASM 198
 SCHED3 - SITES AND AREAS OF SIGNIFICANCE
 TO MĀORI SASM 199
 SCHED3 - SITES AND AREAS OF SIGNIFICANCE
 TO MĀORI SASM 200
 SCHED3 - SITES AND AREAS OF SIGNIFICANCE
 TO MĀORI SASM 201
 SCHED3 - SITES AND AREAS OF SIGNIFICANCE
 TO MĀORI SASM 202
 SCHED3 - SITES AND AREAS OF SIGNIFICANCE
 TO MĀORI SASM 203
 SCHED3 - SITES AND AREAS OF SIGNIFICANCE
 TO MĀORI SASM 204
 SCHED3 - SITES AND AREAS OF SIGNIFICANCE
 TO MĀORI SASM 205
 SCHED3 - SITES AND AREAS OF SIGNIFICANCE
 TO MĀORI SASM 206
 SCHED3 - SITES AND AREAS OF SIGNIFICANCE
 TO MĀORI SASM 207
 SCHED3 - SITES AND AREAS OF SIGNIFICANCE
 TO MĀORI SASM 208
 SCHED3 - SITES AND AREAS OF SIGNIFICANCE
 TO MĀORI SASM 209

Support in part

Westland Mineral Sands Co. Ltd has a minerals exploration permit in this area, and the current provisions relating to minerals extraction would make mineral extraction a non-complying activity. It is important that SASMs are accurately mapped and associated with cultural values with such provisions being included in the Proposed Plan.

The submitters seek that SASM179 is re-evaluated to provide an accurate area on the planning maps which reflects cultural values associated with the site.

SCHED3 - SITES AND AREAS OF SIGNIFICANCE
 TO MĀORI SASM 210
 SCHED3 - SITES AND AREAS OF SIGNIFICANCE
 TO MĀORI SASM 211
 SCHED3 - SITES AND AREAS OF SIGNIFICANCE
 TO MĀORI SASM 212
 SCHED3 - SITES AND AREAS OF SIGNIFICANCE
 TO MĀORI SASM 213
 SCHED3 - SITES AND AREAS OF SIGNIFICANCE
 TO MĀORI SASM 214
 SCHED3 - SITES AND AREAS OF SIGNIFICANCE
 TO MĀORI SASM 215
 SCHED3 - SITES AND AREAS OF SIGNIFICANCE
 TO MĀORI SASM 216

SCHED4 - SCHEDULE OF SIGNIFICANT NATURAL AREAS Section

SCHED5 - SCHEDULE OF OUTSTANDING NATURAL LANDSCAPES Section

SCHED6 - SCHEDULE OF OUTSTANDING NATURAL FEATURES Section

SCHED7 - SCHEDULE OF HIGH COASTAL NATURAL CHARACTER Section

SCHED8 - SCHEDULE OF OUTSTANDING COASTAL NATURAL CHARACTER Section

SCHED9 - LAWFULLY ESTABLISHED MINERAL EXTRACTION AND PROCESSING AREAS Section

SCHED9 - LAWFULLY ESTABLISHED MINERAL EXTRACTION AND PROCESSING AREAS	SCHED9 - LAWFULLY ESTABLISHED MINERAL EXTRACTION AND PROCESSING AREAS	Amend	Add the Cape Foulwind Mineral Sand Mine, consented pursuant to RC210051.	Add Cape Foulwind Mineral Sand Mine
SCHED9 - LAWFULLY ESTABLISHED MINERAL EXTRACTION AND PROCESSING AREAS	Buller Coalfield Zone			
SCHED9 - LAWFULLY ESTABLISHED MINERAL EXTRACTION AND PROCESSING AREAS	Stockton Mine			
SCHED9 - LAWFULLY ESTABLISHED MINERAL EXTRACTION AND PROCESSING AREAS	Denniston Plateau			
SCHED9 - LAWFULLY ESTABLISHED MINERAL EXTRACTION AND PROCESSING AREAS	Mineral Extraction Zone			
SCHED9 - LAWFULLY ESTABLISHED MINERAL EXTRACTION AND PROCESSING AREAS	Roa Mine Blackball			
SCHED9 - LAWFULLY ESTABLISHED MINERAL EXTRACTION AND PROCESSING AREAS	Rajah Mine, Blackball			
SCHED9 - LAWFULLY ESTABLISHED MINERAL EXTRACTION AND PROCESSING AREAS	Echo Mine, Reefton			
SCHED9 - LAWFULLY ESTABLISHED MINERAL EXTRACTION AND PROCESSING AREAS	New Creek Mine, New Creek			
SCHED9 - LAWFULLY ESTABLISHED MINERAL EXTRACTION AND PROCESSING AREAS	Giles Creek Mine Reefton			
SCHED9 - LAWFULLY ESTABLISHED MINERAL EXTRACTION AND PROCESSING AREAS	Mai Mai Siding			
SCHED9 - LAWFULLY ESTABLISHED MINERAL EXTRACTION AND PROCESSING AREAS	Reefton Distribution Centre			
SCHED9 - LAWFULLY ESTABLISHED MINERAL EXTRACTION AND PROCESSING AREAS	Island Block Mine Reefton			

SCHED9 - LAWFULLY ESTABLISHED MINERAL EXTRACTION AND PROCESSING AREAS Grey Valley Distribution Centre, Ikamatua

SCHED9 - LAWFULLY ESTABLISHED MINERAL EXTRACTION AND PROCESSING AREAS Strongman Mine, Rapahoe

SCHED9 - LAWFULLY ESTABLISHED MINERAL EXTRACTION AND PROCESSING AREAS Strongman Mine, Access and infrastructure

SCHED9 - LAWFULLY ESTABLISHED MINERAL EXTRACTION AND PROCESSING AREAS Strongman East Mine

SCHED9 - LAWFULLY ESTABLISHED MINERAL EXTRACTION AND PROCESSING AREAS Rapahoe Coal Yard

SCHED9 - LAWFULLY ESTABLISHED MINERAL EXTRACTION AND PROCESSING AREAS Rocky Creek Coal Washery

SCHED9 - LAWFULLY ESTABLISHED MINERAL EXTRACTION AND PROCESSING AREAS Kaiata Yard

SCHED9 - LAWFULLY ESTABLISHED MINERAL EXTRACTION AND PROCESSING AREAS Kiwi Quarry

SCHED9 - LAWFULLY ESTABLISHED MINERAL EXTRACTION AND PROCESSING AREAS Karamea Quarry

SCHED9 - LAWFULLY ESTABLISHED MINERAL EXTRACTION AND PROCESSING AREAS Blackball Quarry

SCHED9 - LAWFULLY ESTABLISHED MINERAL EXTRACTION AND PROCESSING AREAS Okuru Quarry

SCHED9 - LAWFULLY ESTABLISHED MINERAL EXTRACTION AND PROCESSING AREAS BRM Developments Ianthe Forest Mine

SCHED9 - LAWFULLY ESTABLISHED MINERAL EXTRACTION AND PROCESSING AREAS Birchfields Ross Mine

SCHED9 - LAWFULLY ESTABLISHED MINERAL EXTRACTION AND PROCESSING AREAS R&M Mining Mine Ross Township

SCHED9 - LAWFULLY ESTABLISHED MINERAL EXTRACTION AND PROCESSING AREAS Reefton Restoration Project/ Globe Progress Mine

SCHED9 - LAWFULLY ESTABLISHED MINERAL EXTRACTION AND PROCESSING AREAS Snowy River Gold Mine

SCHED9 - LAWFULLY ESTABLISHED MINERAL EXTRACTION AND PROCESSING AREAS Westland Schist Quarry

SCHED9 - LAWFULLY ESTABLISHED MINERAL EXTRACTION AND PROCESSING AREAS Karamea Lime Quarry

SCHED10 - PREVIOUSLY MINED LOCATIONS IN THE RURAL AND OPEN SPACE AND RECREATION ZONES Section

Appendices Section

Appendix One: Transport Performance Standards Section

Appendix One: Transport Performance Standards Appendix One: Transport Performance Standards

Appendix One: Transport Performance Standards TRN Table 1

Appendix One: Transport Performance Standards TRN Table 2

Appendix One: Transport Performance Standards	TRN Table 3			
Appendix One: Transport Performance Standards	TRN S1			
Appendix One: Transport Performance Standards	TRN S2			
Appendix One: Transport Performance Standards	TRN S3			
Appendix One: Transport Performance Standards	TRN Figure 1			
Appendix One: Transport Performance Standards	TRN S4			
Appendix One: Transport Performance Standards	TRN Table 4			
Appendix One: Transport Performance Standards	TRN S5			
Appendix One: Transport Performance Standards	TRN Table 5			
Appendix One: Transport Performance Standards	TRN S6			
Appendix One: Transport Performance Standards	TRN S7			
Appendix One: Transport Performance Standards	TRN S8			
Appendix One: Transport Performance Standards	TRN S9			
Appendix One: Transport Performance Standards	TRN S10			
Appendix One: Transport Performance Standards	TRN S11			
Appendix One: Transport Performance Standards	TRN – Figure 2			
Appendix One: Transport Performance Standards	TRN – Figure 3			
Appendix One: Transport Performance Standards	TRN – Figure 4			
Appendix One: Transport Performance Standards	TRN S12			
Appendix One: Transport Performance Standards	TRN S12			
Appendix One: Transport Performance Standards	Table TRN 6	Support	Support the 'Mining and Quarrying' High Trip Generating Activities being triggered by >30 heavy vehicle movements per day.	Retain as notified
Appendix One: Transport Performance Standards	TRN S14			

Appendix Two: Recession Planes Section

Appendix Three: Design Guidelines Section

Appendix Four: Accidental Discovery Protocols Section

Appendix Five: Statutory Acknowledgements Section

Appendix Six: Nohoanga Entitlements Section

Appendix Seven: Mineral Extraction Management Plan Requirements Section

Appendix Seven: Mineral Extraction Management Plan Requirements	Appendix Seven: Mineral Extraction Management Plan Requirements
---	---

Appendix Seven: Mineral Extraction Management Plan Requirements

Outline of Content Requirements for a Mineral Extraction Management Plan

Oppose in part

The proposed Mineral Extraction Management Plan requirements are presented in a confusing manner, and not all matters listed in the outline may be required for each specific mineral extraction site. Amendments are proposed for consistency and clarity.

Amend Outline of Content Requirements for a Mineral Extraction Management Plan as follows:

1. Introduction
 - i. Statutory Approvals – status
 - ii. Location
 - iii. Overview of the mineral extraction operations
2. Receiving Environment (address all that are relevant)
 - i. Climate
 - ii. Geology
 - iii. Hydrology – including presence of lakes, wetlands and waterways
 - iv. Terrestrial ecology including key species
 - v. Landscape context
 - vi. Neighbouring land uses
 - vii. Coastal environment
3. Management of Environmental Effects
 - i. Terrestrial Ecology (address all that are relevant)
 - a. Native vegetation
 - b. Native fauna
 - c. Significant natural areas
 - d. Key species
 - e. Key risks to be managed
 - f. Any specific species or ecosystem management plans
 - ii. Landscape ~~values and Amenity (address all that are relevant)~~
 - a. ~~Landscape values~~
 - b. ~~Neighbouring land uses~~

Appendix Eight: Community Living Precinct Concept Plans Section

Appendix Nine: Airport Approach Path Overlay Section

Appendix Ten: New Zealand Archaeological Association Sites of Māori Origin Section

FURTHER SUBMISSION

Proposed Te Tai o Poutini Plan

Under Clause 8 of the First Schedule, Resource Management Act 1991

To: Te Tai o Poutini Plan Committee
388 Main South Road
Paroa
Greymouth 7805

By email: info@tpp.nz

Submission by: WMS Group (HQ) Limited and WMS Land Co. Limited

Address for Service: Anderson Lloyd
PO Box 13831
Christchurch 8140

120 Medway Road
Hanmer Springs 7334

Email: alex.booker@al.nz; ray@wmsnz.com

- 1 WMS Group (HQ) Limited and WMS Land Co. Limited (**WMS**) made a submission (S599) on the Proposed Te Tai o Poutini Plan (**TTPP**).
- 2 WMS has an interest in TTPP that is greater than the interest that the general public has.
- 3 This further submission on TTPP is on various submission points and seeks various forms of relief (allowing and disallowing the original submissions) as set out in **Appendix 1** to this further submission. There are multiple submitters and submission points on the same or similar provisions and a representative submission has been joined, rather than submitting on each point and/or all submissions made on that provision.
- 4 The relief sought will:
 - (a) Assist the Grey, Buller and Westland District Councils in fulfilling their statutory duties under the Resource Management Act 1991 (RMA) including the integrated management of the effects of the use, development, or protection of land;
 - (b) meet the requirements of section 32 of the RMA; and
 - (c) promote the sustainable management of natural and physical resources in accordance with Part 2 of the RMA, and in particular the efficient use of natural and physical resources.
- 5 WMS wishes to be heard in support of its further submission, and will consider presenting a joint case with others presenting similar submissions.



Alex Booker

For WMS Group (HQ) Limited and WMS Land Co. Limited

Appendix 1 – further submission points

This further submission is in relation to the original submission of:	The particular parts of the original submission I/we support/oppose are:	My/our position on the original submission:	The reason for my/our support/opposition to the original submission are:	Allow or disallow the original submission (in full or in part)	Give precise details of why you wish to allow/disallow (in full or in part) to indicate the decision you want Council to make
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.019	Oppose	Oppose for the reasons set out in WMS's original submission	Disallow in full	This submission point seeks to make substantial changes to a number of provisions without assessing the appropriateness of such a change in context of the rule.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.333	Oppose	Oppose for the reasons set out in WMS's original submission	Disallow in full	A prohibited activity status in the NOSZ is not appropriate. Ecological assessments for mining are not necessary in every instance and need to relate to actual effects on the environment.
Straterra (S536)	S536.025	Support		Allow	WMS wishes to appropriately enable mining under the TTPP
Manawa Energy Limited (Manawa Energy) (S438)	S438.024	Support	Support for the reasons set out in WMS's original submission	Allow	WMS wishes to appropriately enable mining under the TTPP. The proposed wording provides an acceptable alternative relief to WMS's relief sought on the provision.
Development West Coast (S484)	S484.004	Support	Support for the reasons set out in WMS's original submission	Allow in full	WMS wishes to appropriately enable mining under the TTPP and the proposed additional strategic objectives reflect this.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.003	Oppose	Oppose for the reasons set out in WMS's original submission.	Disallow in full	WMS supports the Strategic Objectives as notified, except where specific relief is sought in its original submission.
Development West Coast (S484)	S484.003	Support	Support for the reasons set out in WMS's original submission	Allow in full	WMS wishes to appropriately enable mining under the TTPP and the proposed additions reflect this.

Manawa Energy Limited (Manawa Energy) (S438)	S438.025	Support	Support for the reasons set out in WMS's original submission	Allow in full	WMS wishes to appropriately enable the West Coast Ports and adding Regionally Significant Infrastructure (as defined in the West Coast Regional Policy Statement) supports this.
Waka Kotahi NZ Transport Agency (S450)	S450.015	Support	Support for the reasons set out in WMS's original submission	Allow in full	WMS wishes to appropriately enable the West Coast Ports and identifying that there is a functional or operational need for ports to locate in areas potentially subject to natural hazards supports this.
Terra Firma Mining Limited (S537)	S537.008	Support	Support for the reasons set out in WMS's original submission	Allow in full	WMS wishes to appropriately enable mining under the TTPP.
Terra Firma Mining Limited (S537)	S537.006	Support	Support for the reasons set out in WMS's original submission	Allow	WMS wishes to appropriately enable mining under the TTPP. The proposed wording provides an acceptable alternative relief to WMS's relief sought on the provision.
Manawa Energy Limited (Manawa Energy) (S438)	S438.028	Support	Support for the reasons set out in WMS's original submission	Allow in full	WMS wishes to appropriately enable mining under the TTPP. A focus on protecting outstanding features and significant indigenous biodiversity is supported.
Department of Conservation (S602)	S602.029	Oppose	Oppose for the reasons set out in WMS's original submission	Disallow in full	WMS wishes to appropriately enable mining under the TTPP. Addition of "enhance" to this objective is not appropriate.
Waka Kotahi NZ Transport Agency (S450)	S450.060	Oppose	Oppose for the reasons set out in WMS's original submission	Disallow in full	A rule seeking consent for every activity accessing off a State Highway is unnecessary, not likely to be connected to adverse effects, and is appropriately covered under access standards and the High Trip Generator rule
Waka Kotahi NZ Transport Agency (S450)	S450.058	Support	Support for the reasons set out in WMS's original submission	Allow in part	WMS supports the clarification of activity status and seeks that TRN-R14 is deleted and that High Trip Generating Activities are restricted discretionary.

Buller District Council (S538)	S538.086	Support	Support for the reasons set out in WMS's original submission	Allow in full	WMS supports deleting this unnecessary rule.
Natural Environment Values					
Buller Conservation Group (S552)	S552.006	Oppose	Oppose for the reasons set out in WMS's original submission	Disallow in full	WMS does not support the proposal to separate objectives.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.413	Oppose	Oppose for the reasons set out in WMS's submission	Disallow in full	WMS does not support SNA provisions applying to unmapped areas.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.415	Oppose	Oppose for the reasons set out in WMS's submission	Disallow in full	WMS does not support any policy direction such as this which inappropriately singles out mining activities.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.192	Oppose	Oppose for the reasons set out in WMS's submission	Disallow in full	WMS does not support SNA provisions applying to unmapped areas. WMS in particular opposes the following statements being included: "Specifically, to recognise and provide for the protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna; and more broadly, for the control of any actual or potential effects of the use, development, or protection of land for the purpose of maintaining indigenous biodiversity. The WCRPS, which this Plan must give effect to, sets out criteria for determining significance and requires that all areas meeting this criteria, whether mapped in the Plan or not, are to be known as Significant Natural Areas, or SNAs."

					<p>“Where the provisions in this Plan refer to Significant Natural Areas this includes areas which are not yet included as SNA in Schedule Four, that nevertheless meet one or more of the significance criteria. Where there is uncertainty as to whether an area may meet the criteria, or in the absence of an ecological assessment, precaution and protection should be favoured, and a resource consent sought.”</p>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.200	Oppose	Oppose for the reasons set out in WMS’s submission	Disallow in full	WMS does not support the changes to ECO – P1 which seek to revisit the SNA mapping of the Grey District because this exercise has already been completed.
Department of Conservation (S602)	S602.068	Oppose	Oppose for the reasons set out in WMS’s submission	Disallow in full	WMS does not support the removal of ECO – P2.d which allows consideration of the functional need of an activity to locate within an area of significant indigenous vegetation.
West Coast Penguin Trust (S275)	S275.003	Oppose	Oppose for the reasons set out in WMS’s submission	Disallow in full	The proposed amendments to protect habitat of indigenous fauna whether the vegetation is indigenous or not could result in perverse outcomes such as property owners being required to retain pest weed species. Indigenous fauna is protected under the Wildlife Act.
Manawa Energy Limited (Manawa Energy) (S438)	S438.080	Support	Support for the reasons set out in WMS’s submission	Allow in full	WMS supports the proposed amendments.
Department of Conservation (S602)	S602.073	Oppose	Oppose for the reasons set out in WMS’s submission	Disallow in full	WMS does not support the wording changes to this policy.

Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.503	Oppose	Oppose for the reasons set out in WMS's submission	Disallow in full	WMS does not support the inclusion of an additional rule. The proposed wording requires an assessment of vegetation to determine compliance which will result in a significant regulatory burden for councils and applicants. WMS does not support a non-complying activity status for vegetation clearance.
Department of Conservation (S602)	S602.010	Oppose	Oppose for the reasons set out in WMS's submission	Disallow in full	WMS does not support the inclusion of an advice note which increases the regulatory burden because this will create confusion around activity status for vegetation clearance until SNAs are mapped.
Department of Conservation (S602)	S602.075	Oppose	Oppose for the reasons set out in WMS's submission	Disallow in full	The proposed amendments create difficulty in determining compliance with permitted activity rules and potentially require a full ecological assessment to determine whether the WCRPS criteria apply to a particular piece of vegetation. The permitted activity limit on vegetation clearance outside of mapped SNAs is sufficient and further regulatory burden for small scale vegetation clearance is not necessary.
Scoped Planning and Design Limited (S617)	S617.008, S617.008	Oppose	Oppose for the reasons set out in WMS's submission	Disallow in full	The proposed amendments to the rule would mean that there is no permitted vegetation clearance in the Buller or Westland Districts which would result in perverse outcomes.
Department of Conservation (S602)	S602.076	Oppose	Oppose for the reasons set out in WMS's submission	Disallow in full	The proposed amendments create difficulty in determining compliance with permitted activity rules and potentially require a full ecological assessment to determine whether the WCRPS criteria apply to a particular piece of vegetation. The permitted activity limit on vegetation

					clearance outside of mapped SNAs I sufficient and further regulatory burden for small scale vegetation clearance is not necessary.
Grey District Council (S608)	S608.057	Support	Support for the reasons set out in WMS's submission	Allow in full	WMS supports the change proposed which recognises that SNA mapping has been undertaken in the Grey District.
Department of Conservation (S602)	S602.078	Oppose	Oppose for the reasons set out in WMS's submission	Disallow in full	The proposed amendments create difficulty in determining activity status prior to SNAs being mapped.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.504	Oppose	Oppose for the reasons set out in WMS's submission	Disallow in full	WMS does not support the inclusion of an additional rule with a non-complying activity status.
Hadley Mills (S534)	S534.002	Support	Support for the reasons set out in WMS's submission	Allow in full	WMS supports the review of the ONL overlay, including in relation to how it would impact WMS interests.
Department of Conservation (S602)	S602.085	Oppose	Oppose for the reasons set out in WMS's submission	Disallow in full	WMS does not agree with including values other than landscape within the matters of control for Natural Features and Landscapes.
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.343	Oppose	Oppose for the reasons set out in WMS's submission	Disallow in full	WMS does not support including precautionary approach or the qualifiers to the functional and operational needs of activities. The Draft NPS-IB and NPS-FM do not directly relate to ONLs.
Department of Conservation (S602)	S602.091	Oppose	Oppose for the reasons set out in WMS's submission	Disallow in full	WMS does not agree with including values other than landscape within the policies for Natural Features and Landscapes.
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.364	Oppose	Oppose for the reasons set out in WMS's submission	Disallow in full	WMS does not agree with applying a precautionary approach or requiring the effects management hierarchy to be applied to the Natural Character chapter.

Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.366	Oppose	Oppose for the reasons set out in WMS's submission	Disallow in full	WMS does not support the additional wording in the objective.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.248	Oppose	Oppose for the reasons set out in WMS's submission	Disallow in full	WMS does not support the use of the word avoid in this policy.
Buller Conservation Group (S552)	S552.027	Oppose	Oppose for the reasons set out in WMS's submission	Disallow in full	WMS does not support the addition of riparian margin rules for streams less than 3m in width, or increased riparian margins for major rivers.
Buller Conservation Group (S552)	S552.208	Oppose	Oppose for the reasons set out in WMS's submission	Disallow in full	There has been no resource management justification provided to support a change in activity status to prohibited.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.041	Oppose	Oppose for the reasons set out in WMS's submission	Disallow in full	WMS does not support the removal of permitted activity earthworks and vegetation clearance in riparian margins.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.253	Oppose	Oppose for the reasons set out in WMS's submission	Disallow in full	WMS supports rule NC-R1 as notified.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.518	Oppose	Oppose for the reasons set out in WMS's submission	Disallow in full	WMS does not support the inclusion of a rule with non-complying activity status for activities in riparian margins.

Department of Conservation (S602)	S602.135	Oppose	Oppose for the reasons set out in WMS's submission	Disallow in full	WMS do not support the inclusion of a non-complying activity status.
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.195	Support	Support for the reasons set out in WMS's submission	Allow in part	WMS support policy ASW – P3 insofar as it seeks to enable commercial activities that support the wellbeing of the community. The current plan provisions do not appropriately give effect to this policy. WMS seeks a clear permitted activity rule which provides for port operations at the Greymouth and Buller Ports on the surface of the navigable waters in the vicinity of the port infrastructure.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.278	Oppose	Oppose for the reasons set out in WMS's submission	Disallow in full	WMS supports CE-O1 as notified.
Department of Conservation (S602)	S602.141	Oppose	Oppose for the reasons set out in WMS's submission	Disallow in full	WMS supports CE-O1 as notified.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.283	Oppose	Oppose for the reasons set out in WMS's submission	Disallow in full	WMS does not support the inclusion of this new policy.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.312	Oppose	Oppose for the reasons set out in WMS's submission	Disallow in full	WMS does not support the inclusion of the proposed discretionary rule, which may have unintended consequences for activities not listed.

Department of Conservation (S602)	S602.165	Oppose	Oppose for the reasons set out in WMS's submission	Disallow in full	WMS does not support the inclusion of the proposed non-complying, which may have unintended consequences for activities not listed.
Westpower Limited (S547)	S547.440	Support	Support for the reasons set out in WMS's submission	Allow in full	WMS supports the inclusion of the proposed matters of discretion.
Westpower Limited (S547)	S547.441	Support	Support for the reasons set out in WMS's submission	Allow in full	WMS supports the inclusion of the proposed matters of discretion.
Westpower Limited (S547)	S547.482	Support	Support for the reasons set out in WMS's submission	Allow in full	WMS particularly supports including recognition of the technical, locational, functional or operational constraints or requirements of activities.
Lorree Wilson (S81)	S81.001	Oppose	Oppose for the reasons set out in WMS's submission	Disallow in full	WMS supports the noise rules as notified, except that the night time and day time hours should consistently be applied as 7:00am-10:00pm (daytime) and 10:00pm-7:00am (night time) throughout the week.
Zones					
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.020, S560.0549, S560.358, S560.361	Oppose	Oppose for the reasons set out in WMS's submission	Disallow in full	WMS supports the activity status of mineral extraction as notified, except where otherwise specified in WMS's original submission.
Straterra (S536)	S536.053	Support	Support for the reasons set out in WMS's submission	Allow in full	WMS supports the additional wording proposed by Straterra.
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.605, S190.610, S190.646	Oppose	Oppose for the reasons set out in WMS's submission	Disallow in full	WMS does not support the inclusion of the effects management hierarchy in the context of this policy, which could lead to it being inappropriately applied.
Buller Conservation Group (S552)	S552.173	Oppose	Oppose for the reasons set out in WMS's submission	Disallow in full	WMS does not support the inclusion of indigenous biodiversity provisions in the RURZ, as they belong in the ECO chapter of the proposed Plan.

All submitters above	All submission points above	As above.	As above.	Any relief further and/or consequential to the above.	To give effect to the reasons given above.
----------------------	-----------------------------	-----------	-----------	---	--