

**IN THE ENVIRONMENT COURT
CHRISTCHURCH REGISTRY**

**I MUA I TE KŌTI TAIAO O AOTEAROA
KI ŌTAUTAHI**

ENV-2025-CHC-000102

IN THE MATTER OF an appeal under clause 14 of Schedule 1 and
section 274 of the RMA

BETWEEN **BIRCHFIELD COAL MINES LIMITED**

Appellant

AND **TE TAI O POUTINI PLAN COMMITTEE**

Respondent

NOTICE BY GREY DISTRICT COUNCIL OF WISH TO BE A PARTY TO PROCEEDINGS

Dated: 2 February 2026

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NOTICE BY GREY DISTRICT COUNCIL OF WISH TO BE A PARTY TO PROCEEDINGS

To: The registrar at the Environment Court, Christchurch

And to: The Appellant.

And to: The Respondent

Grey District Council (**GDC**) wishes to be a party to an appeal by Birchfield Coal Mines Limited against the decision of the Te Tai o Poutini Committee on the proposed Te Tai o Poutini Plan (**TTPP**).

Nature of interest

1. GDC is a local authority under the Resource Management Act 1991 (**RMA**).
2. GDC is not a trade competitor for the purposes of sections 308C or 308CA of the RMA.
3. GDC is interested in part of the proceedings. The part of the proceedings that GDC is interested in are those that apply within the Grey District which relate to the following chapters of the TTPP, and as particularised in Appendix 1 (attached):
 - (a) Relationships between Spatial Layers - Rural Zone Descriptions, Special Purpose Zone Descriptions – Mineral Extraction Zone, Overlays – Significant Natural Areas;
 - (b) Definitions (Land Based Primary Production);
 - (c) Strategic Directions, Overview, MIN – Mineral Extraction and LBPP – Land Based Primary Production;
 - (d) NH - Natural Hazards;
 - (e) ECO – Ecosystems and Indigenous Biodiversity;
 - (f) CE - Coastal Environment;
 - (g) EW – Earthworks;
 - (h) GRUZ – General Rural Zone;
 - (i) MINZ – Mineral Extraction Zone;
 - (j) OSRZ – Open Space and Recreation Zone;

- (k) Appendices (Appendix Seven: Mineral Extraction Management Plan Requirements); and
 - (l) Any other parts of the appeal that are affected by or related to the above.
4. GDC is interested in the following particular issues:
- (a) ensuring that the TTPP is workable for GDC as a local authority and that it assists GDC in carrying out its functions under the RMA; and
 - (b) ensuring the TTPP recognises that:
 - (i) The West Coast has a unique environment, that is characterised by about 85% of land in the region managed by the Department of Conservation. This unique context means that development in the remaining areas needs to be enabled to provide for the region's social, economic and cultural wellbeing.
 - (ii) The Grey District needs sustainable infrastructure and services that enable communities to be thriving, resilient and connected.
 - (iii) The TTPP should enable the use and development of natural and physical resources while ensuring protections are appropriate for the West Coast.
 - (iv) The TTPP should not create pressures on affordability of housing, farming, industry and infrastructure, as well as other developments through disproportionate or unworkable standards for development and use in the region.
 - (v) The West Coast region is highly susceptible to the impacts of climate change and natural hazards, which require ensuring the protection of infrastructure and development.

Relief sought

5. GDC's position as to whether it supports, opposes or conditionally opposes a specified relief is set out in the table in Appendix 1.
6. GDC's reasons for supporting a relief where specified in Appendix 1 are:
- (a) the relief will promote the sustainable management of natural and physical resources within the Grey District, and is therefore consistent with Part 2 and other provisions of the RMA;

- (b) the relief will meet the reasonably foreseeable needs of future generations;
 - (c) the relief will enable the social, economic and cultural wellbeing of the people of the Grey District;
 - (d) the relief will facilitate the efficient use and development of natural and physical resources;
 - (e) the relief will avoid, remedy or mitigate actual or potential adverse effects on the environment;
 - (f) the relief is the most appropriate way to achieve the purpose of the RMA and/or objectives of the TTPP in terms of section 32 of the RMA;
 - (g) the relief will ensure the TTPP is workable for GDC as a local authority and that it assists GDC in carrying out its functions under the RMA; and
 - (h) the further specific reasons where set out in Appendix 1 (without limiting the general reasons above).
7. GDC further notes that where similar relief is sought by other appellants, consistency between the other similar appeals is supported.
8. GDC's reasons for opposing a relief where specified in Appendix 1 are:
- (a) the relief will not promote the sustainable management of natural and physical resources within the Grey District, and is therefore inconsistent with Part 2 and other provisions of the RMA;
 - (b) the relief will not meet the reasonably foreseeable needs of future generations;
 - (c) the relief will not enable the social, economic and cultural wellbeing of the people of the Grey District;
 - (d) the relief will not facilitate the efficient use and development of natural and physical resources;
 - (e) the relief will not avoid, remedy or mitigate actual or potential adverse effects on the environment;
 - (f) the relief is not the most appropriate way to achieve the purpose of the RMA and/or objectives of the TTPP in terms of section 32 of the RMA;

- (g) the relief will not ensure the TTPP is workable for GDC as a local authority and that it assists GDC in carrying out its functions under the RMA; and
 - (h) the further specific reasons where set out in Appendix 1 (without limiting the general reasons above).
9. GDC's reasons for conditionally opposing a relief are set out in Appendix 1. Where GDC has conditionally opposed a relief, GDC may revisit its position and support the relief if the matters signalled in Appendix 1 are addressed by the appellant (to GDC's satisfaction). GDC however reserves the right to oppose the relief for the general reasons set out at paragraph 8.

Alternative dispute resolution

10. GDC agrees to participate in mediation or other alternative dispute resolution of the proceedings.

Dated: 2 February 2026.



G A Biggs / J C Sylvester
Counsel for Grey District Council

This document is filed by Jonathon Cameron Sylvester, solicitor for Grey District Council of the firm Corcoran French, Lawyers. The address for service is at 74 Armagh Street, PO Box 13-001, Christchurch, Phone: (03) 379 4660. Documents for service on Grey District Council may be left at the address for service or may be:

- (a) Posted to the solicitor at PO Box 13001, Christchurch 8141; or
- (b) Emailed to jonathon@cflaw.co.nz as long as they are contemporaneously emailed to geraldine@cflaw.co.nz.

Advice

If you have any questions about this notice, contact the Environment Court in Christchurch.

Appendix 1: Grey District Council's interest in the appeal of Birchfield Coal Mines Ltd.

#	TTPP Provisions	Relief sought by the appellant	Grey District Council's position	Further Reasons for Grey District Council's Position
1.	Relationships between spatial layers - Rural Zone Descriptions	Areas used predominantly for primary production activities, including intensive indoor primary production, <u>mineral extraction and associated activities</u> . The zone may also be used for a range of activities that support primary production activities, including associated rural industry, and other activities that require a rural location, <u>including mineral stockpiling, handling and distribution</u> .	Support.	
2.	Relationships between Spatial layers - Special Purpose Zone Descriptions - Mineral Extraction Zone	Locations where mineral extraction and ancillary activities are expected to be the predominant use <u>Locations throughout Te Tai Poutini / The West Coast where mineral resources are known to exist and mineral extraction has occurred, is occurring or will occur. Mineral Prospecting, Exploration, Extraction and Ancillary Activities will occur in these areas.</u>	Support.	
3.	Relationships between spatial layers – Overlays Significant natural Areas	Areas of significant indigenous vegetation and significant habitats of indigenous fauna. Only some of these areas have been identified on in Schedule Four.	Support.	

4.	Definition - Area of Significant Indigenous Biodiversity.	Delete, or amend to match legal definition of SNA.	GDC is not interested in this part of the proceedings.	
5.	Definitions - Ancillary Activity	Means an activity that supports and is subsidiary to a primary activity <u>and includes mineral stockpiling, processing and transport when associated with Mineral Prospecting, Exploration and Extraction.</u>	GDC is not interested in this part of the proceedings.	
6.	Definitions - Biodiversity Compensation	Delete	GDC is not interested in this part of the proceedings.	
7.	Definitions - Biodiversity Offset	Delete	GDC is not interested in this part of the proceedings.	
8.	Definitions - Ecological District	Delete	GDC is not interested in this part of the proceedings.	
9.	Definitions - Effects Management Hierarchy	Delete	GDC is not interested in this part of the proceedings.	
10.	Definition - Energy Activity	means the use of land (<u>including mineral extraction where that mineral is used for energy generation</u>), buildings and structures for the purpose of energy investigation, generation, transmission and distribution. This includes all types of renewable electricity generation.	GDC is not interested in this part of the proceedings.	

11.	Definition - Existing Use Rights	<u>means a use of land that was lawfully established before the relevant rule in Te Tai o Poutini Plan becomes operative where: a. the effects of the use are similar in character, intensity and scale; and b. the use has not been discontinued for a continuous period of more than 12 month</u>	GDC is not interested in this part of the proceedings.	
12.	Definitions - Indigenous Biodiversity	Delete	GDC is not interested in this part of the proceedings.	
13.	Definitions - Land Based Primary Production	means production from agricultural, pastoral, horticultural, or forestry activities that is reliant on the soil resource of the land. Definition inconsistent with Primary Production which specifically includes mining and quarrying activities. All references and definition of Land Based Primary Production to be deleted from the TTPP and replaced with Primary Production.	Conditionally oppose.	GDC considers that further particulars are required to understand the consequences of this change. GDC may revisit its position if further particulars (satisfactory to GDC) are provided by the appellant.
14.	Definitions - Lawfully Established	means buildings, structures and activities provided for by one of the following: 1. permitted through a rule in a plan, or 2. a resource consent, or 3. a national environmental standard, or 4. a designation; or 5. or by an existing use right (as provided for in Section 10 of the RMA), or 6. In the case of mineral extraction it also includes an activity permitted at the date that this Plan was notified	GDC is not interested in this part of the proceedings.	

		through a Coal Mining Licence or an Ancillary Coal Mining Licence issued under the Coal Mines Act (1979); and does not include where the resource consent or license has either expired or lapsed.		
15.	Definitions - Net Gain	Delete	GDC is not interested in this part of the proceedings.	
16.	Definitions - Open Space Management Plan	means a Reserve Management Plan or Conservation Management Plan or Conservation Management Strategy or National Park Management Plan or Iwi/Papatipu Rūnanga Management Plan or other Management Plan prepared in accordance with the Reserves Act 1977 or the Conservation Act 1987.	GDC is not interested in this part of the proceedings.	
17.	Definitions - Significant Natural Area	means a. any area that, after the commencement date (4 August 2023), is notified or included in a district plan as an SNA following an assessment of the area in accordance with Appendix 1 of the National Policy Statement <u>for Indigenous Biodiversity 2023</u> ; and b. any area that, on the commencement date (4 August 2023), is already identified in a policy statement or plan as an area of significant indigenous vegetation significant habitat of indigenous fauna (regardless of how it is described); in which case it remains as an SNA unless or until a suitably qualified ecologist engaged by the relevant local authority determines that it is not an area of significant indigenous vegetation or significant habitat of indigenous fauna.	GDC is not interested in this part of the proceedings.	

18.	Definitions - Threatened Environments Classification	Delete or amend	GDC is not interested in this part of the proceedings.	
19.	Definitions - Threatened or At Risk / Threatened or At Risk (Declining)	Delete	GDC is not interested in this part of the proceedings.	
20.	Definitions - Wetland	has the same meaning as in section 2 of the RMA (as set out below) includes permanently or intermittently wet areas, shallow water, and land water margins that support a natural ecosystem of plants and animals that are adapted to wet conditions <u>and excludes areas of pasture where water ponds after rain.</u>	GDC is not interested in this part of the proceedings.	
21.	National Policy Statement and New Zealand Coastal Policy Statement	The higher order documents listed in this section should be the most relevant or up to date versions that apply at the time of an Environment Court decision	GDC is not interested in this part of the proceedings.	
22.	National Environmental Standards	Delete	GDC is not interested in this part of the proceedings.	
23.	Regulations	Delete	GDC is not interested in this part of the proceedings.	
24.	Strategic Direction	Amend to reinstate the words which required all the objectives and policies to be read in a manner consistent with the strategic directions and amend "2. Alignment with	Support.	-

		<p>the communities' aspirations for development while maintaining and enhancing <u>managing</u> environmental quality across the Te Tai o Poutini/the West Coast;"</p> <p>6. Enabling the use and development of natural and physical resources whilst protecting <u>managing</u> the natural, cultural and heritage values that have been elevated to matters of national importance by the Resource Management Act 1991 and those matters of national and regional significance by National and Regional Policy Statements;</p> <p><u>14 Recognise and provide for the continuation of existing mineral extraction activities authorised by historic permissions, while not inappropriately restricting the development of the wider minerals industry within Te Tai O Poutini / the West Coast.</u></p>		
25.	Land Based Primary Production Strategic Objectives	Amend to refer to Primary Production and not "land based primary production"	Conditionally oppose.	
26.	Climate Change and Resilience	<p>CCR - O2 Greenhouse gas emissions are reduced and opportunities to transition to a low carbon emission economy are provided, including as a result of new technology.</p> <p><u>CCR - O2 Support industrial users of energy within Te Tai O Poutini / the West Coast to have access to local energy sources to ensure energy security and continuity of supply.</u></p>	GDC is not interested in this part of the proceedings.	

		<u>CCR-O2 -Support industrial users of energy within Te Tai O Poutini / the West Coast to have access to local energy sources to ensure energy security and continuity of supply.</u> <u>CCR-P5 Support, at a local level, reduction in emissions of greenhouse gases, including through providing for low carbon transport option such as walking, cycling and electric vehicles.</u>		
27.	Mineral Extraction	<u>MIN - O1 Support t</u> <u>The use and development of Te Tai o Poutini/the West Coast's mineral resources while also avoiding duplication of regulation across agencies and managing adverse effects on the environment.</u>	Support.	
28.		<u>MIN - O2 To enable mineral extraction and ancillary activities which support it, including specifically within the Buller Coalfield Zone, Mineral Extraction Zone, Rural Zones and Natural Open Space and Open Space Zones.</u>	Support.	
29.		<u>MIN - O3 To recognise that mineral resources are widespread and fixed in location throughout the West Coast/Te Tai o Poutini and that provided adverse effects are managed, mineral extraction activities can be appropriate in a range of locations outside specified zones and precincts.</u>	Support.	
30.		<u>MIN - O4 To ensure that new subdivision, use and development does not compromise existing mineral extraction activities, including through reverse sensitivity to effects such as dust, noise and traffic generation.</u>	Support.	

31.		<u>MIN - O5 To support Poutini Ngāi Tahu to manage their pounamu and aotea stone resources through the use of Pounamu and Aotea Management Area Overlays</u>	Support.	
32.		<u>MIN - O6 To: a. Avoid, remedy or mitigate the adverse effects of mineral extraction activities on the West Coast/Te Tai o Poutini's significant natural and cultural features, sites and heritage, and amenity values, including: i. Poutini Ngāi Tahu cultural resources and taonga including sites and areas of significant to Māori identified in Schedule Three; ii. Areas of significant indigenous vegetation, significant indigenous fauna habitat and protected native fauna; iii. Outstanding natural landscapes and features; iv. Waterways and waterbodies; v. The coastal environment; vi. The wellbeing of people and communities; and b. Allow adverse effects to be addressed by alternative mitigation measures such as biodiversity offsetting and environmental compensation</u>	Support.	
33.		<u>MIN - P1 Enable mineral extraction and ancillary activities which support it, specifically through a Buller Coalfield Zone, and Mineral Extraction Zone, and provide for these activities in appropriate locations within the Rural Zones, and Open Space Zones and Natural Open Space Zones.</u>	Support.	
34.	Natural Environment	Delete NENV-O1, O2, P1 and P2 and reinstate NENV-O1-O4 as notified.	GDC is not interested in this part of the proceedings.	

35.		NENV-O1 - reinstate as notified.	GDC is not interested in this part of the proceedings.	
36.		<u>NENV - O3 Recognise and provide for a wide range of activities to occur throughout Te Tai O Poutini / the West Coast.</u>	GDC is not interested in this part of the proceedings.	
37.		<u>NENV-P2 In relation to the natural environment recognise: f. Mineral Prospecting, Exploration and Extraction and Quarrying occurs throughout Te Tai O Poutini / the West Coast including within areas of high conservation value and that these activities are not mutually exclusive.</u>	GDC is not interested in this part of the proceedings.	
38.	Energy	<u>ENG - P11 Discourage the development of non-renewable electricity generation activities.</u>	GDC is not interested in this part of the proceedings.	
39.		<u>ENG - R9 Temporary Energy Activities Activity Status Permitted ... or 4. The temporary energy activity is a back-up generator, provided this equipment is: i. Being tested and maintained for a period not exceeding 48 hours in duration; or ii. To provide back-up electricity during routine or scheduled maintenance for a period not exceeding 48 hours; or for longer than 48 hours where that use complies with the noise limits specified between 0700 hours and 2200 hours relevant to the underlying zone; or iii. For emergency purposes only and operates for a maximum of 12 months.</u>	GDC is not interested in this part of the proceedings.	

40.		<u>ENG - R21 Non-renewable Electricity Generation Activities Activity Status Non-complying Discretionary</u>	GDC is not interested in this part of the proceedings.	
41.	Infrastructure	Delete INF - R11 Back-up Generators	GDC is not interested in this part of the proceedings.	
42.	Transport	Overlay Chapters - The Overlay Chapters have provisions in relation to Sites and Areas of Significance to Māori; Historic Heritage; Ecosystems and Indigenous Biodiversity; Natural Features and Landscape; Natural Character and Margins of Waterbodies; Natural Hazards; <u>Mineral Extraction Zone</u> ; and the Coastal Environment. Where a transport activity is located within an overlay area (as identified in the planning maps) then the relevant overlay provisions apply.	GDC is not interested in this part of the proceedings.	
43.	Hazardous Substances	Workplace controls over Hazardous Substances are applied via the Health and Safety at Work (Hazardous Substances) Regulations 2016. The overview section of this Part should be amended to provide updated guidance.	GDC is not interested in this part of the proceedings.	
44.	Historic Heritage	HH - P6 When considering proposals for relocation or repositioning of historic heritage items identified in Schedule One, the following matters shall be considered: h. Functional need and operational need of regionally significant infrastructure and <u>mineral extraction activities</u> , where there is no practicable alternative location and heritage values of the item are maintained.	GDC is not interested in this part of the proceedings.	

45.		HH - M4 Detailed documentation of historic heritage values of items, areas and archaeological sites listed in Schedule One will be undertaken by the end of 2026. The record of these assessments will be placed on the Te Tai o Poutini Plan website and directly linked to Schedule One. Priorities for assessment are as follows: 1. Those items and areas which are on private land or are privately owned. 2. Items and areas on Crown land outside of the public conservation estate. 3. Items and areas on district or regional council lands.	GDC is not interested in this part of the proceedings.	
46.	Ecosystems and Indigenous Biodiversity	Birchfield Coal acknowledges the importance of indigenous biodiversity but also recognises that presence of indigenous vegetation does not automatically denote the presence of 'indigenous biodiversity', and certainly not significant indigenous biodiversity. A balance needs to be struck that does not prevent people clearing low-quality vegetation, or prevent activities that will benefit communities - such as, and we understand the government is seeking to make further changes in this area. As such, we consider that all provisions in this chapter should be reconsidered against any new legislation/policy, which is expected to be provided prior to appeals reaching hearing stage.	Neither support nor oppose as no relief is specified.	This section is a submission and covering explanation rather than relief.
47.		WCRPS Reference to Appendix 1 needs to be amended or deleted. The intention is for these areas to be mapped, and not for the Appendix 1 criteria to be wholesale adopted in district council plans.	Oppose.	The references are considered appropriate to ensure consistency with higher order instruments.

48.		Te Mana o te Taiao - Aotearoa New Zealand Biodiversity Strategy 2020 reference deleted. If any reference is required, the NPS-IB is more appropriate.	GDC is not interested in this part of the proceedings.	
49.		Other relevant TTPP Provisions <u>Mineral Extraction Zone</u> . MINZ to be added to this section to recognise and provide for relationship and need for mineral extraction and its effects on Ecosystems and Indigenous Biodiversity.	Support.	
50.		Retain Objectives as they were notified in the TTPP (with the exception of new ECO-P11). Primary relief, for reason of duplication of the NPS-IB without local application which is the intent of the TTPP process.	Oppose.	Current wording reflects the NPS-IB requirements.
51.		New Objective sought to give effect to NENV-O3 "when considering resource consent applications which have effects on ecosystems and indigenous biodiversity, have regard to the protection afforded to other similar ecosystems and indigenous biodiversity within public conservation land"	Support.	
52.		Retain Policies as they were notified in the TTPP and support recognition of offsetting and compensation after avoiding, remedying and mitigation has been applied. Seeks at least the following additions and deletions to the TTPP rules as they were notified: ECO-P2 (d) operational need to be recognised; ECO-P6 removal of the words "avoid", in (b) exclude manuka and Kanuka from indigenous cover, and delete "or disruption to ecological processes, functions or connections"; P7 add a new (h) "the functional or operational need for the activity to occur	Conditionally oppose.	GDC generally supports the intention of recognising the operational need of activities and further supports enabling mining activities in principle. This relief, however, needs further evidence and explanation to determine its appropriateness before it can be supported. GDC may revisit its position if further evidence and explanation (satisfactory to GDC) is provided by the appellants.

		within areas of significant indigenous vegetation or significant habitats of indigenous fauna".		
53.		<p>ECO-P2 Provide for activities within areas of significant indigenous biodiversity where: a. This is for lawfully established activity and the adverse effects are no greater in intensity, scale or character over time than <u>allowed</u> at 4 August 2023, and do not result in the loss of ecosystem representation and extent or degradation of ecological integrity; or b. This is for maintenance of improved pasture as part of a regular cycle of periodic maintenance; or c. It is for Poutini Ngāi Tahu Activities; or d. This is undertaken on Poutini Ngāi Tahu land in accordance with an Iwi/Papatipu Rūnanga Management Plan or on specified Māori land; or e. This is for the construction or upgrade of regionally significant infrastructure.</p> <p>Amendments required to ensure this would allow the continuation of existing mineral extraction activities - even if the full extent of the permission had not been used on 4 August 2023.</p>	Oppose.	GDC generally supports the intention of this relief, but the particulars of the relief sought are unclear. The description of the relief is consistent with the definition of lawfully established activity in the TTPP, and change may not be necessary to achieve this relief. It is unclear what relief is needed to address this issue, and the appellant should provide further particulars. GDC may revisit its position if further particulars (satisfactory to GDC) are provided.
54.		ECO - P3 Provide for activities within Significant Natural Areas within Schedule Four where the adverse effects of the activity on the significant natural area are managed in accordance with the effects management hierarchy, the activity has a functional need or operational need to be located within the area and there is no practicable	Oppose.	GDC notes that the exceptions provided in the NPS-IB are restricted to areas that provide significant national or regional benefit. The relief sought does not appear to be consistent with the NPS-IB. GDC is supportive of enabling mineral extraction activities and may

		alternative location, and it is for the purpose of: a. Construction or upgrade of regionally significant infrastructure; or b. Mineral extraction that provides significant national public benefit that could not otherwise be achieved using resources within New Zealand ; or c. Aggregate extraction that provides significant national or regional public benefit that could not otherwise be achieved using resources within New Zealand .		revisit its position if the appellant provides an alternative relief (satisfactory to GDC) that is consistent with higher order planning instruments.
55.		ECO-P7 - Delete	Oppose.	GDC supports an enabling approach to mineral extraction. However, the relief sought here risks inconsistency with higher order documents and the objectives of the TTPP. If the relief is amended and further explanation is given (both satisfactory to GDC), GDC may revisit its position.
56.		ECO-P8 Protect indigenous biodiversity in the coastal environment by: b. - amend. Amend to account for contribution mineral extraction makes regionally, and if any new legislation/policy in this area.	Oppose.	GDC supports an enabling approach to mineral extraction. However, the relief sought here risks inconsistency with higher order documents and the objectives of the TTPP. If the relief is amended and further explanation is given (satisfactory to GDC) GDC may revisit its position.
57.		ECO - P10 Protect indigenous biodiversity in the coastal environment by: b. Avoiding <u>Managing</u> adverse effects on significant indigenous biodiversity; and c. Using the effects management hierarchy to <u>manage</u> avoid significant adverse effects on indigenous vegetation, dunes,	Oppose.	The appellant has not provided sufficient reasons for this relief. ECO-P10 needs to be consistent with the NZCPS policy 11. Replacing “avoiding” with “managing” does not appear to align with the avoid direction in

		estuaries, coastal wetlands, habitats and species within the coastal environment		the NZCPS. If this relief is further refined and the reasons for it expanded upon (satisfactory to GDC), GDC may revisit its position to support relief.
58.		ECO - P12 To promote the resilience of indigenous biodiversity to climate change and recognise its role in mitigating the effects of climate change.	Oppose.	The appellant has not provided sufficient reasons for this relief. ECO-P12 incorporates NPS-IB Policy 4 into the TTPP. Further explanation and refinement of the relief sought is required to determine whether it is appropriate to give effect to higher order instruments. If further explanation and refinement (satisfactory to GDC) is provided, GDC may revisit its position.
59.		Primary relief is to seek to retain the rules as originally notified in the TTPP with larger permitted vegetation clearances in R1, deletion of R2 and recognition of the functional or operational needs to activities to locate within areas of indigenous vegetation requiring clearance (R5). Otherwise, alternative relief as set out below.	Conditionally Oppose.	GDC is supportive of larger permitted vegetation clearances in principle however further particulars of the proposed relief are required. While GDC generally supported the notified version of the TTPP, there were significant changes to national direction since it was first notified in 2022. GDC may revisit its position if further particulars are provided (satisfactory to GDC) to demonstrate the notified version is consistent with higher order instruments.
60.		ECO - R1 General Standards Permitted activities standards outside Significant Natural Areas: Reinstate previous version of ECO-R1.	Conditionally Oppose.	GDC is supportive of larger permitted vegetation clearances in principle however further particulars of the proposed relief are

				required. While GDC generally supported the notified version of the TTPP, there were significant changes to national direction since it was first notified in 2022. GDC may revisit its position if further particulars are provided (satisfactory to GDC) to demonstrate the notified version is consistent with higher order instruments.
61.		ECO - R3 Indigenous vegetation clearance for maintenance and repair of lawfully established structures and activities outside of Significant Natural Areas not provided for in Rule ECO - R1 Activity Status Permitted Where: 1. The clearance is for the maintenance and repair of lawfully established activities (<u>including mineral extraction activities</u>) and structures including tracks, accessways, fences, pipelines, drains, natural hazard mitigation structures, shelterbelts and woodlots, environmental monitoring facilities and infrastructure; or 2. The clearance is for the maintenance of improved pasture for farming. Advice Note: 1. In relation to standard 1 of this rule, the reference to infrastructure applies where the infrastructure is not regulated by Rule ECO - R2.	Oppose.	While GDC generally supported the notified version of the TTPP, there were significant changes to national direction since it was first notified in 2022. GDC may revisit its position if further particulars are provided (satisfactory to GDC) to demonstrate the notified version is consistent with higher order instruments.
62.		ECO - R6 Indigenous vegetation clearance outside of Significant Natural Areas not provided for in another Permitted Activity Rule Activity Status Permitted 12. For mineral <u>prospecting, exploration, extraction and ancillary</u> extraction or prospecting activities within the	Support.	

		MINZ - Mineral Extraction Zone or BCZ - Buller Coalfield Zone;		
63.		ECO - R7 Indigenous Vegetation Clearance within a Significant Natural Area Activity Status Permitted Where this is: 1. For the maintenance, operation and repair of lawfully established activities and structures including tracks, fences, drains, structures, infrastructure and renewable electricity generation activities where: i. This is at the same or similar scale, character and intensity as <u>was authorised</u> at 14 July 2022; and ii. The clearance is within 3 metres of the lawfully established activity and is limited to a maximum area of 50m per individual Significant Natural Area; 2. Necessary to remove vegetation that endangers human life or existing buildings or structures, where this is certified by a Council Approved Contractor; 3. For the safe and efficient operation (including maintenance and repair) of any formed public road, rail corridor or access where the removal is within 3 metres of the formed width of the road, rail corridor or access where this is undertaken by a Road or Rail Controlling Authority; 4. To comply with section 43 of the Fire and Emergency Act 2017; 5. To enable removal of unwanted organisms declared under the Biosecurity Act 2015.	Oppose.	While GDC generally supported the notified version of the TTPP, there were significant changes to national direction since it was first notified in 2022. GDC may revisit its position if further particulars are provided (satisfactory to GDC) to demonstrate the notified version is consistent with higher order instruments.
64.		ECO - R9 Indigenous vegetation clearance not meeting Permitted or Controlled Activity Standards outside of a Significant Natural Area in the Grey District Activity Status	Oppose.	While GDC generally supported the notified version of the TTPP, there were significant changes to national direction since it was first

		Restricted Discretionary Where: 1. This is not within: i.; ii. An area of land environment of category one or two of the Threatened Environment Classification; or iii. An Outstanding Natural Landscape identified in Schedule Five; or iv. An Outstanding Natural Feature identified in Schedule Six; or v. An area of High Coastal Natural Character identified in Schedule Seven; or vi. An area of Outstanding Coastal Natural Character identified in Schedule Eight. Discretion is restricted to b. Consideration of the functional need or operational need of network utilities, renewable electricity generation, <u>mineral prospecting, exploration and extraction activities</u> and regionally significant infrastructure;		notified in 2022. GDC may revisit its position if further particulars are provided (satisfactory to GDC) to demonstrate the notified version is consistent with higher order instruments.
65.		ECO - R10 Indigenous vegetation clearance not meeting ECO - R5 Permitted, Controlled or Restricted Discretionary Rules Activity Status Discretionary Where: 1. An ecological assessment undertaken by a suitably qualified ecologist identifies that the indigenous vegetation clearance will not adversely affect an area of significant indigenous biodiversity using the WCRPS, Appendix 4 NPS-IB <u>assessment criteria</u> ; and ...	Oppose.	While GDC generally supported the notified version of the TTPP, there were significant changes to national direction since it was first notified in 2022. GDC may revisit its position if further particulars are provided (satisfactory to GDC) to demonstrate the notified version is consistent with higher order instruments.
66.		ECO - R12 Indigenous vegetation clearance not meeting ECO - R10 Activity Status Non-complying <u>Discretionary</u>	Oppose.	While GDC generally supported the notified version of the TTPP, there were significant changes to national direction since it was first notified in 2022. GDC may revisit its position if further particulars are provided (satisfactory to

				GDC) to demonstrate the notified version is consistent with higher order instruments.
67.	Natural Character and Margins of Waterbodies	NC-O3 amend to include operational need	GDC is not interested in this part of the proceedings.	
68.	NC-P2	Retain NC-P2 as notified in the TTPP (primary relief) or alternatively add mineral extraction provisions. NC - P2 Provide for earthworks within riparian margins of lakes, rivers and wetlands where adverse effects on natural character are avoided, remedied or mitigated and: c. It is for the establishment, operation, maintenance or upgrading of renewable electricity generation activities, <u>mineral prospecting, exploration or extraction</u> , or regionally significant infrastructure where this has a functional or operational need to be located in a riparian margin.	GDC is not interested in this part of the proceedings.	
69.	NC - R1	Amended to include mineral extraction activities NC - R1 Indigenous Vegetation Clearance and Earthworks within the Riparian Margin of a River, Lake or Wetland Activity Status Permitted Where this is outside of any Significant Natural Area identified in Schedule Four, and for: xv: Mineral Prospecting, Exploration or Extraction	GDC is not interested in this part of the proceedings.	
70.	Natural Features and Landscapes	These areas may also include regionally significant infrastructure, mineral extraction, renewable electricity generation activities, and other elements of the built environment and have varying degrees of modification	GDC is not interested in this part of the proceedings.	

71.		<p>NFL - P2 Provide for activities within outstanding natural landscapes described in Schedule Five and outstanding natural features described in Schedule Six where they maintain the values that contribute to a natural feature or landscape being outstanding and are for: a. Existing land uses and lawfully established activities including existing residential activities, regionally significant infrastructure, network utilities, energy renewable electricity generation activities, mineral extraction, agricultural, horticultural and pastoral activities;</p> <p>Amend to include Mineral extraction and/or primary production (which includes mining) needs to be referenced within this Policy. Should also be referenced in Overview.</p>	GDC is not interested in this part of the proceedings.	
72.		NFL - P2 (now NFL-P3) - Retain as it was notified in the TTPP	GDC is not interested in this part of the proceedings.	
73.		NFL - P4 - amend to include mineral extraction, exploration and prospecting'	GDC is not interested in this part of the proceedings.	
74.		<p>NFL - R11 Mineral Extraction in the Buller Coalfield Zone and Mineral Extraction Zone, <u>General Rural Zone, Open Space and Natural Open Space</u> within an Outstanding Natural Landscape described in Schedule Five Activity Status Restricted Discretionary Where:</p> <p>1. These are on land within the Buller Coalfield Zone or a Mineral Extraction Zone, <u>General Rural Zone, Open Space and Natural Open Space</u> and</p>	GDC is not interested in this part of the proceedings.	

		<p>2. This includes earthworks and buildings associated with the activity. Discretion is restricted to:</p> <ul style="list-style-type: none"> a. Any requirements for landscape evaluation; b. Managing adverse effects on historical, cultural, and biodiversity values; c. Amenity and visual effects; d. Managing effects on public access and natural character; e. Effects on the values that make the feature or landscape Outstanding; f. Identifying and avoiding adverse effects on Poutini Ngāi Tahu values; g. Extent and design of earthworks; and h. Mitigation measures for landscape effects <p>NFL - R11 earthworks for mineral extraction outside of MINZ should also be provided for as a restricted discretionary activity.</p>		
75.	Coastal Environment	CE - R11 Earthworks in the Outstanding Coastal Environment Amend to include mineral extraction.	Support.	
76.		CE - R18, R16 Earthworks within the Outstanding Coastal Environment Area not provided for as meeting Permitted Activity standards Amend to include mineral extraction.	Support.	
77.	Earthworks	Amendments to ensure it is clear that the earthworks chapter does not apply to mineral extraction, exploration,	Conditionally oppose.	GDC is supportive in principle of an enabling approach to earthworks associated with

		prospecting and ancillary activities in any zone. Ensure Chapter and provisions are amended as necessary to make this clear.		mineral activities however further particulars about the proposed structure and its consequences for the TPP are required along with specific wording for amended provisions. GDC may revisit its position if these matters are addressed (to its satisfaction) in the proceedings.
78.		Earthworks Associated with Mineral Extraction - the Zone and Overlay Chapters have provisions which manage mineral extraction and its ancillary activities. The earthwork rules within this chapter do not apply to mineral extraction, mineral prospecting or mineral exploration <u>or ancillary activities.</u>	Conditionally oppose.	GDC is supportive in principle of an enabling approach to earthworks associated with mineral activities however further particulars about the proposed structure and its consequences for the TPP are required along with specific wording for amended provisions. GDC may revisit its position if these matters are addressed (to its satisfaction) in the proceedings.
79.		EW - R1 Earthworks General Standards All Permitted activities must comply with the following relevant standards g. Rule EW - R1 does not apply to earthworks associated with mineral extraction, mineral exploration, or mineral prospecting.	Conditionally oppose.	GDC is supportive in principle of an enabling approach to earthworks associated with mineral activities however further particulars about the proposed structure and its consequences for the TPP are required along with specific wording for amended provisions. The subpoint lettering/numbering does not appear to be accurate. GDC may revisit its position if these matters are addressed (to its satisfaction) in the proceedings.

80.		<p>EW - R2 Earthworks - All Zones Activity Status Permitted</p> <p>a. Rule EW - R2 does not apply to earthworks associated with mineral extraction, mineral exploration, or mineral prospecting.</p>	Conditionally oppose.	<p>GDC is supportive in principle of an enabling approach to earthworks associated with mineral activities however further particulars about the proposed structure and its consequences for the TPP are required along with specific wording for amended provisions. The subpoint lettering/numbering does not appear to be accurate. GDC may revisit its position if these matters are addressed (to its satisfaction) in the proceedings.</p>
81.		<p>EW - R3 Earthworks in the GRUZ - General Rural Zone, RLZ - Rural Lifestyle Zone, any INZ - Industrial Zone, FUZ - Future Urban Zone, AIRPZ - Airport Zone, any OSRZ - Open Space and Recreation Zone and the MPZ - Māori Purpose Zone</p> <p>5. Rule EW - R3 does not apply to earthworks associated with mineral extraction, mineral exploration, or mineral prospecting.</p>	Conditionally oppose.	<p>GDC is supportive in principle of an enabling approach to earthworks associated with mineral activities however further particulars about the proposed structure and its consequences for the TPP are required along with specific wording for amended provisions. The subpoint lettering/numbering does not appear to be accurate. GDC may revisit its position if these matters are addressed (to its satisfaction) in the proceedings.</p>
82.		<p>EW - R4 Earthworks in any RESZ - Residential Zone, the NCZ - Neighbourhood Centre Zone or SETZ - Settlement Zone</p> <p>a. Rule EW - R4 does not apply to earthworks associated with mineral extraction, mineral exploration or mineral prospecting.</p>	<p>Conditionally Oppose</p> <p>GDC notes its own appeal in respect of EW-R4 and prefers its own appeal point</p>	<p>GDC is supportive in principle of an enabling approach to earthworks associated with mineral activities however further particulars about the proposed structure and its consequences for the TPP are required along with specific wording for amended provisions. The subpoint lettering/numbering does not</p>

			in the event of inconsistency.	appear to be accurate. GDC may revisit its position if these matters are addressed (to its satisfaction) in the proceedings.
83.	Open Space and Recreation Zones	<u>The Open Space and Recreation Zone supports a range of Mineral Prospecting, Exploration and Extraction activities. The ability of the people and communities of the West Coast to continue to use this land to generate income is important to the ongoing provision of their social, cultural and economic wellbeing.</u>	GDC is not interested in this part of the proceedings.	
84.		the Department of Conservation is exempt under the Resource Management Act from being required to meet these on land it administers	GDC is not interested in this part of the proceedings.	
85.		The lands zoned Open Space and Recreation Zones are also governed by specific legislation such as the Reserves Act, the National Parks Act and Conservation Act. Many matters that impact on resource management are governed through these Acts, and through the Management Plans that are required by these Acts. As a consequence, the Objectives, Policies and Rules provide for a linkage to the Reserve National Park and other types of Open Space Management plans that are in place for these areas under their governing legislation. As these Open Space Management Plans must be prepared through a consultative process with affected communities, the aim of the approach of referring to them within Te Tai o Poutini Plan provisions is to reduce the duplication of provisions and regulation of activities within these areas.	GDC is not interested in this part of the proceedings.	

		<p>Where no Open Space Management Plan is in place, a full regulatory pathway is provided for within Te Tai o Poutini Plan. Land included within the Open Space and Recreation Zones adjoins a number of other territorial authority boundaries not managed by Te Tai o Poutini Plan. When considering activities close to territorial authority boundaries, plan users need to apply care with regard to managing any potential cross boundary resource management issues.</p> <p>Remove to avoid duplication of regulation</p>		
86.	Map	Remove NOSZ from private land at Giles Creek, including Section 9-11 Block V Reefton Survey District, and rezone as MINZ and to provide for Mineral Extraction	GDC is not interested in this part of the proceedings.	
87.		<p>The NOSZ – Natural Open Space Zone is where the Plan recognises and provides for open spaces that contain high natural and ecological values. The Zone is made up of the most ecologically significant open space and reserves where natural values predominate such as National Parks, Nature Reserves, Scientific Reserves, Wilderness Areas and Specially Protected Areas as well as other areas of public conservation land identified with very high natural values. A low level of development and built form is anticipated within this zone to retain the natural/biodiversity values within natural open space areas.<u>The nature of the West Coast, with its extensive mineral deposits, means that minerals are widespread</u></p>	GDC is not interested in this part of the proceedings.	

		<u>within areas in the Natural Open Space Zone. There are a range of circumstances where some mineral extraction may be appropriate, particularly where this supports ongoing access and management of the lands within the zone. . This means that provision is also made for mineral extraction within the Natural Open Space Zone.</u>		
88.		OSRZ - O1 To recognise the different functions, values and purpose of open space on Te Tai o Poutini/the West Coast through providing for three Open Space and Recreation Zones: a. The NOSZ - Natural Open Space Zone with high natural values and a low level of development and built form <u>while providing for appropriate mineral extraction activities.</u>	GDC is not interested in this part of the proceedings.	
89.		Amend to include mineral extraction policies like those for the Rural Zones. OSRZ - P1 Open space should be developed and used in accordance with any relevant operative Reserves Act or Conservation Act Management Plan.	GDC is not interested in this part of the proceedings.	
90.		OSRZ - P2 Open space may accommodate recreational, cultural, natural, heritage, access and amenity values and functions and ancillary activities to support these, <u>including mineral extraction</u> , electricity transmission, distribution and renewable electricity generation where this fits with the purpose of the open space and its classification under any relevant Act.	Support.	

91.		<p>OSRZ – P15 Provide for Mineral Extraction, Mineral Prospecting and Mineral Exploration activities within the OSZ – Open Space Zone where: a. Adverse effects on open space and recreation values and the environment are managed; b. Sites are rehabilitated when mineral extraction activities cease to enable future land uses and activities appropriate to the area; c. Areas and values identified in Schedules One to Eight and the Overlay Chapters are protected; d. Significant ecological values are protected and indigenous biodiversity is maintained.</p> <p>Delete and retain the rule as notified in the TTPP, but include references to mineral extraction, mineral prospecting and mineral exploration activities.</p>	GDC is not interested in this part of the proceedings.	
92.		<p>OSRZ - P22 Provide for Mineral Extraction, Mineral Prospecting and Mineral Exploration activities within the NOSZ – Natural Open Space Zone where: a. Adverse effects on open space and recreation values and the environment are managed; b. Sites are rehabilitated when mineral extraction activities cease to enable future land uses and activities appropriate to the area; c. Areas and values identified in Schedules One to Eight and the Overlay Chapters are protected; d. Significant ecological values are protected and indigenous biodiversity is maintained.</p> <p>Delete and retain the rule as notified in the TTPP, but include references to mineral extraction, mineral prospecting and mineral exploration activities.</p>	GDC is not interested in this part of the proceedings.	

93.	Natural Open Space Zone	Amend to include provisions that enable mineral extraction / quarrying within this zone. Protections to high value conservation land are provided via Schedule 4 of the Crown Minerals Act.	GDC is not interested in this part of the proceedings.	
94.		NOSZ - R18 Mineral Prospecting, Mineral Exploration and Mineral Extraction Activities Activity Status Non-complying <u>Discretionary</u>	GDC is not interested in this part of the proceedings.	
95.	Open Space Zone	Amend to include provisions that enable mineral extraction / quarrying within this zone. Protections to high value conservation land are provided via Schedule 4 of the Crown Minerals Act.	GDC is not interested in this part of the proceedings.	
96.		OSZ - R10 Delete and retain rule as notified in the TTPP	GDC is not interested in this part of the proceedings.	
97.	Rural Zones	Because the Rural areas represent such a large part of Te Tai o Poutini/the West Coast, in addition to the RURZ - Rural Zones Objectives and Policies the Strategic Objectives also provide particularly relevant considerations for the management of these areas	GDC is not interested in this part of the proceedings.	
98.		RURZ – P23 Require proposals for new mineral extraction activities to provide adequate information on the: a. The establishment and operation of the mineral extraction activity to enable an assessment of environmental effects; b. Measures to avoid, remedy or mitigate adverse effects; and rehabilitation c. Rehabilitation of the mineral extraction area to the	GDC is not interested in this part of the proceedings.	

		condition prior to the activity occurring when mineral extraction activity ceases.		
99.	General Rural Zone Rules	Amendments required to enable consent pathway for mineral prospecting, exploration and extraction and ancillary activities. Overview could be bolstered by more information to demonstrate the importance of the minerals sector.	Conditionally oppose.	GDC is supportive in principle of mineral activities in the GRUZ. GDC notes the detail of the relief is unclear however and notes its own appeal on this matter. GDC may revisit its position if specific wording for amended rules (satisfactory to GDC) is provided by the appellant.
100.		GRUZ - R11 Mineral Extraction PA Rule: Revert non-compliance activity status to as notified: Controlled where this is a previously mined area ... Otherwise Restricted Discretionary.	Oppose.	GDC's own appeal on GRUZ-R11 would provide more appropriate control.
101.		GRUZ - R17 Mineral Extraction and Mineral Prospecting and Mineral Exploration not meeting Permitted Activity standards - Revert to notified (GRUZ - R18 and GRUZ-25) Restricted Discretionary Rule	Support.	
102.	Mineral Extraction Zone	Primary relief - amend the MINZ and all its provisions to restore what was initially included in the Proposed TTPP.	Support.	
103.		The MINZ - Mineral Extraction Zone covers areas where there are discrete, long term mineral extraction activities, which enables management of associated effects, including reverse sensitivity effects. Areas in the zone include minerals that are currently authorised. support climate change adaptation and transition to a low emissions economy. This authorisation is from three different mechanisms and includes: 1. Coal mining	Support.	

		<p><u>licences under the Coal Mines Act (1979); 2. Ancillary coal mining licences under the Coal Mines Act (1979); and 3. Resource consents issued under the Resource Management Act (1991).</u></p> <p>Retain pre notification decision wording. MINZ specifically set up to enable mineral extraction, decisions version does not enable mineral extraction.</p>		
104		<p>MINZ - P1 To identify and provide for significant mineral resources (where these are found in a discrete location) by identifying MINZ - Mineral Extraction Zones and applying provisions to facilitate discrete, long term mineral extraction activities. To provide for the existing</p> <p><u>lawfully established mineral extraction and processing activities in the MIN-Mineral Extraction Zone and the opportunities for reasonable growth and expansion to meet future demands, while managing adverse effects on the environment.</u></p>	Support.	
105		<p><u>MINZ - R2 Mineral Extraction and Processing Activity</u></p> <p><u>Status Permitted Where:</u></p> <p><u>1. The mineral extraction and processing are lawfully established at the date the Plan becomes operative;</u></p> <p><u>2. Where the site is active, or intended to be active within the next 12 months:</u></p> <p><u>a. To the extent not already required by any coal mining licence or resource consent, a Mineral Extraction Management Plan shall be prepared in accordance with the outline provided in Appendix Seven and be submitted</u></p>	Support.	

		<p><u>to the relevant district council within 12 months for certification. This plan will:</u></p> <p><u>i. Provide an outline of the issues and values that need to be managed at the site;</u></p> <p><u>ii. Provide the detail of how these issues and values will be managed;</u></p> <p><u>iii. Set out a schedule of annual monitoring to be undertaken; and</u></p> <p><u>iv. Outline the rehabilitation and mine closure process for the site;</u></p> <p><u>b. To the extent not already required by any coal mining licence or resource consent, an annual Environmental Monitoring Report and Annual Work Plan shall be prepared and submitted to the Consent Authority by 30 March of each calendar year. These Plans will be required until the relevant district council certifies that rehabilitation is complete;</u></p> <p><u>3. During mineral extraction activity, progressive rehabilitation of all disturbed areas is undertaken in accordance with the rehabilitation programme in the Mineral Extraction Management Plan;</u></p> <p><u>4. Upon ceasing of mineral extraction and processing activity, a programme of mine closure shall be undertaken in accordance with the mine closure programme in the Mineral Extraction Management Plan;</u></p>		
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		<p><u>5. No blasting or vibration shall occur outside the hours of 0700 to 2200 hours weekdays and 0800 to 1800 hours on weekends and public holidays;</u></p> <p><u>6. A bond is in place with the relevant district council;</u></p> <p><u>7. Noise meets the Permitted Activity Standards in Rule NOISE - R7; and</u></p> <p><u>8. Light and glare meet the Permitted Activity standards in Rule LIGHT R4.</u></p> <p><u>Advice Note:</u></p> <p><u>1. Only active mineral extraction sites, or those expected to be active within 12 months are required to prepare a Mineral Extraction Management Plan, Annual Work Plan or Environmental Monitoring Report.</u></p> <p><u>2. Mineral Extraction within the Pounamu and Aotea Overlays is subject to Rule SASM - R7.</u></p> <p><u>3. Where an activity subject to this rule is located within an Overlay Chapter area then compliance with the relevant Overlay Chapter rules is required.</u></p> <p><u>4. The activity may require a resource consent from the West Coast Regional Council. In particular there are restrictions in relation to earthworks within 100m of a wetland and work which may affect waterbodies</u></p>		
106		MINZ - R5 - Revert rule to notified version (MINZ-R6) to provide a controlled activity status for Mineral Extraction not complying with permitted activity standards.	Support.	
107		MINZ - R6 Revert to notified version (MINZ-R7)	Support.	

108	Schedule Four: Significant Natural Areas	BLA-P002 - Mt Davey SNA - amend or remove and ensure that the SNA if retained does not encroach into MINZ or areas occupied (via access agreements), areas of mineral permits, mining licences or related activities.	GDC is not interested in this part of the proceeding.	
109	Schedule Five: Outstanding Natural Landscapes	ONL31 Rapahoe Range - amend or remove and ensure that the ONL if retained does not encroach into MINZ or areas occupied (via access agreements), areas of mineral permits, mining licences or related activities.	GDC is not interested in this part of the proceedings.	
110		ONL33 Victoria Range West - amend or remove and ensure that the ONL if retained does not encroach into MINZ or areas occupied (via access agreements), areas of mineral permits, mining licences or related activities.	GDC is not interested in this part of the proceedings.	
111		ONL22 Bonar, Rangitoto and Bald Hill Ranges -amend or remove, and ensure that the ONL if retained does not encroach into MINZ or areas occupied (via access agreements), areas of mineral permits, mining licences or related activities.	GDC is not interested in this part of the proceedings.	
112	Schedule Nine: Lawfully Established Mineral Extraction and Processing Areas	Reinstate entire Schedule.	GDC is not interested in this part of the proceedings.	
113	Appendix Seven: Mineral Extraction Management Plan	Remove in entirety	Oppose.	The appendix provides useful guidance for plan users as part of a consent process.

114	Appendix Thirteen: Principles and Process for Significant Natural Area Identification	Remove in entirety.	GDC is not interested in this part of the proceedings.	
115	Appendix Fourteen: Principles for Biodiversity Offsetting	Remove in entirety.	GDC is not interested in this part of the proceedings.	
116	Appendix Fifteen: Principles for Biodiversity Compensation	Appendix Fifteen: Principles for Biodiversity Compensation	GDC is not interested in this part of the proceedings.	
117	Various	Additional generalised relief (relevant to the parts of the proceedings that GDC is interested in) sought by the appellant at page 6 of the Notice of Appeal (where amended wording for the provisions is not specified)	Conditionally oppose.	GDC is unable to support relief in general and unspecified terms but may revisit its position if specific wording (satisfactory to GDC) is provided during the appeal process.