

**IN THE ENVIRONMENT COURT
CHRISTCHURCH REGISTRY**

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

ENV-CHC-000117

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

BETWEEN **ROYAL FOREST AND BIRD PROTECTION SOCIETY
OF NEW ZEALAND**

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

Presented for filing by:

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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 the Royal Forest and Bird Protection Society of New Zealand 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 territorial 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 parts of the proceedings that GDC is interested in are those that apply within the Grey District and relate to the following chapters of the TTPP as particularised in Appendix 1 (attached):
 - (a) Strategic Directions (Overview, CCR – Climate Change and Resilience, MIN – Mineral Extraction and NENV – Natural Environment;
 - (b) INF – Infrastructure;
 - (c) TRN – Transport;
 - (d) ECO – Ecosystems and Indigenous Biodiversity;
 - (e) CE – Coastal Environment;
 - (f) EW – Earthworks;
 - (g) LIGHT – Light;
 - (h) RURZ – Rural Zones – Objectives and Policies;
 - (i) GRUZ – General Rural Zone;
 - (j) MINZ – Mineral Extraction 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 appropriate use and development, particularly 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 and uses 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 opposes the relief as set out in the table in Appendix 1.
6. 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).

7. 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 6.

Alternative dispute resolution

8. 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 [Insert]

#	TTPP Provisions	Relief sought by the appellant	Grey District Council's position	Reasons for Grey District Council's Position
1.	Part 1 25 -All Chapter Overview sections	Within all Chapter overview sections under the heading " Other relevant Te Tai o Poutini Plan provisions " where Overlay Chapters include "Ecosystems and Indigenous Biodiversity" also add the "Ecosystems and Indigenous Biodiversity chapter, under the " General District Wide Matters " heading. For example, add this to the ENG, INF, TRN chapters.	GDC is not interested in this part of the proceeding.	
2.	Part 1 - Maps	Differentiate Special Purpose Zones by adding texture, such as hatching or lines	GDC is not interested in this part of the proceeding.	
3.	Part 1 Significant Natural Area	Amend the description of Significant Natural Area overlays: " Areas listed in of significant indigenous vegetation and significant habitats of indigenous fauna. Only some of these areas have been identified on Schedule Four and shown as Significant Natural Areas on the planning maps. Not all areas of significant indigenous vegetation and significant habitats of <u>indigenous fauna have been identified in Schedule Four at this time and the ECO Chapter includes provisions to address this</u> "	GDC is not interested in this part of the proceeding.	
4.	Part 1 – Interpretation: Area of significant indigenous biodiversity	Amend the definition to read: "area(s) of significant indigenous biodiversity: means...."	GDC is not interested in this part of the proceeding.	
5.	Part 1 – Interpretation – Lake	Delete definition and rely on RMA definition	GDC is not interested in this part of	

			the proceeding.	
6.	Part 1 – Interpretation – Mineral Extraction Management Plan	Delete	Oppose	
7.	Part 1 – Interpretation – Renewable Electricity Generation Activities	Insert definition from NPS-REG: Renewable electricity generation activities means the construction, operation and maintenance of structures associated with renewable electricity generation. This includes small and community-scale distributed renewable generation activities and the system of electricity conveyance required to convey electricity to the distribution network and/or the national grid and electricity storage technologies associated with renewable electricity.	GDC is not interested in this part of the proceeding.	
8.	Part 1 – Interpretation – Riparian Margin	Delete the last sentence of the definition “ As measured from the point of annual fullest flow for a river or annual fullest flows for a lake or mean high water spring for a coastal wetland. ”	GDC is not interested in this part of the proceeding.	
9.	Part 2 - Strategic Directions Overview	Amend clause 4 (now 6) to read: “ Enabling the <u>Managing</u> use and development of natural...”	Oppose	
10.	AG-O2 (now LBPP-03)	Amend to “ <u>To recognise that support services and industries are needed to maintain land based primary production’s viability within rural areas</u> ”	GDC is not interested in this part of the proceeding.	
11.	CR-O4 (now CCR-P1)	Amend CCR-P1 by deleting “Regionally Significant” and replacing with “Critical” Reinstate the notified definition for “Critical Infrastructure”: <u>means the rail network, state highways, special purpose roads, airports, wastewater, reticulated water and stormwater plants, defence</u>	Oppose	GDC prefers the wording of “Regionally Significant”.

		<u>facilities, telecommunications networks and electricity generation, transmission and distribution assets.</u>		
12.	MIN - O2 (Now MIN-P1)	Delete MIN-P1	Oppose	
13.	NENV- O1	Replace “necessary” with “degraded” Delete “outstanding”, “significant” and “that contribute to Te Tai o Poutini / the West Coast’s character and identity”	Oppose	
14.	NENV - O4 (now NENV-P1)	Delete or amend as follows: “To identify: a. Important, significant and outstanding areas and features which must be protected; and b. Areas where subdivision, use and development activities can be sustainably managed to provide community economic, cultural and social wellbeing”	Oppose	
15.	Energy - Te Pūngao Overview	The overview section is amended to ensure that it is consistent with the balance of the chapter and provides guidance as to the scope and application of the chapter. The exact amendments will depend on how the appeal points from Forest & Bird and other parties are resolved.	GDC is not interested in this part of the proceeding.	
16.	ENG all provisions	Where this chapters refers to managing biodiversity effects: rather than including a different standard of effects management (e.g., ‘minimising’), a specific requirement should be included to comply with the ECO chapter provisions.	GDC is not interested in this part of the proceeding.	
17.	ENG – O1	Delete “by providing”	GDC is not interested in this part of the proceeding.	

18.	ENG – O2	Delete or amend by changing “manage” to “avoid, remedy or mitigate in accordance with the Natural Environment and District Wide chapters of this Plan.”	GDC is not interested in this part of the proceeding.	
19.	ENG - O3	Delete, or amend so that it provides: To provide for the development, operation, maintenance and upgrade of electricity generation, distribution and supply and renewable energy generation energy activities where adverse effects can be appropriately avoided, remedied or mitigated in accordance with the Natural Environment and District Wide chapters of this Plan and to protect them from the adverse effects of incompatible subdivision and development.	GDC is not interested in this part of the proceeding.	
20.	ENG - P1	Delete “and enable” and after infrastructure add “while addressing adverse effects of these activities in accordance with the Natural Environment and District Wide chapters of this Plan.”	GDC is not interested in this part of the proceeding.	
21.	ENG - P2	<ul style="list-style-type: none"> ● Add “maintain and upgrade” with respect to the existing ● Delete “particular” ● Add a new consideration “opportunities to reduce environmental impacts” 	GDC is not interested in this part of the proceeding.	
22.	ENG - P4	Delete	GDC is not interested in this part of the proceeding.	
23.	ENG - P5	Delete	GDC is not interested in this part of	

			the proceeding.	
24.	ENG - P6	Retain as specific to renewable energy generation, and amend to include: <u>'where the adverse effects are avoided, remedied, or mitigated in accordance with the Natural Environment and District Wide chapters of this Plan.'</u>	GDC is not interested in this part of the proceeding.	
25.	ENG - P7	Delete ENG – P7 or retain the policy and include <u>'avoid, remedy and mitigate in accordance with the Natural Environment and District Wide chapters of this Plan'</u> in both this policy and other ENG policies.	GDC is not interested in this part of the proceeding.	
26.	ENG - P8	<ul style="list-style-type: none"> • Amend b. and d. so that they include any area of significant indigenous biodiversity or any area meeting the criteria in Appendix 1 of the WCRPS and areas covered by Policy 11 of the NZCPS, not just those identified in the schedules. • Make a consequential amendment to d. • Add reference to offset and compensation to e. • Delete "to the extent practicable" from e. 	GDC is not interested in this part of the proceeding.	
27.	ENG - R3	Ensure that the vegetation clearance rules apply to clearance for activities covered by this rule. This would be achieved by amending the definition of renewable energy activities above.	GDC is not interested in this part of the proceeding.	
28.	ENG – R5	Add a clause stating that indigenous vegetation clearance complies with the relevant rules in the ECO chapter.	GDC is not interested in this part of the proceeding.	

29.	ENG – R7	Add a clause stating that indigenous vegetation clearance complies with the relevant rules in the ECO chapter.	GDC is not interested in this part of the proceeding.	
30.	ENG R-10	Add a clause stating that indigenous vegetation clearance complies with the relevant rules in the ECO chapter.	GDC is not interested in this part of the proceeding.	
31.	ENG - R11	Amend Clause a so that it provides “adverse effects on landscape and natural character values”. Amend Clause f so that it provides indigenous biodiversity values, including in areas of significant indigenous biodiversity, and any areas meeting the significance criteria set out in the West Coast Regional Policy Statement, Appendix 1.	GDC is not interested in this part of the proceeding.	
32.	ENG - R12	Add a new matter of discretion, adverse effects on landscape and natural character values. Amend Clause d so that it provides indigenous biodiversity values, including in areas of significant indigenous biodiversity, and any areas meeting the significance criteria set out in the West Coast Regional Policy Statement, Appendix 1.	GDC is not interested in this part of the proceeding.	
33.	ENG - R13	Add a new matter of discretion adverse effects on landscape and natural character values Amend Clause b so that it provides adverse effects on indigenous biodiversity values, including in areas of significant indigenous biodiversity, and any areas meeting the significance criteria set out in the West Coast Regional Policy Statement, Appendix 1.	GDC is not interested in this part of the proceeding.	
34.	ENG - R14	Add a new matter of discretion adverse effects on landscape and natural character values. Amend Clause f so that it provides adverse effects on indigenous biodiversity values, including in areas of significant indigenous	GDC is not interested in this part of	

		biodiversity, and any areas meeting the significance criteria set out in the West Coast Regional Policy Statement, Appendix 1.	the proceeding.	
35.	ENG - R15	Add a definition of large-scale renewable generation activity Delete the words “not meeting Permitted Activity standards” from the rule title	GDC is not interested in this part of the proceeding.	
36.	New ENG - R16	Ensure that permitted activity rules appropriately protect indigenous	GDC is not interested in this part of the proceeding.	
37.	Infrastructure Overview	The overview section is amended to ensure that it is consistent with the balance of the chapter and provides guidance as to the scope and application of the chapter. The exact amendments will depend on how the appeal points from Forest & Bird and other parties are resolved. Insert Note 4 to the Infrastructure Rules into the overview. Provisions relating to energy activities and associated infrastructure are contained in the Energy Chapter and provisions for transport infrastructure are contained in the Transport Chapter.	Oppose	
38.	INF all provisions	The references to “minimise” do not apply to indigenous biodiversity. In relation to indigenous biodiversity, the requirements of the ECO chapter apply.	Oppose	
39.	Infrastructure Rules - Note	Insert Note 4 above the rules into the overview. Provisions relating to energy activities and associated infrastructure are contained in the Energy Chapter and provisions for transport infrastructure are contained in the Transport Chapter.	Oppose.	
40.	INF - O1	Amend as follows: “To enable the safe, efficient and sustainable development,	Oppose	

		operation, maintenance and upgrading of utilities and infrastructure, to meet the needs of the West Coast/Te Tai o Poutini, where adverse effects can be appropriately managed accordance with the Natural Environment and District Wide chapters of this Plan.”		
41.	INF – O5	<p>The objective is amended as follows:</p> <ul style="list-style-type: none"> ● The reference to minimise is deleted ● The adverse effects of infrastructure on the environment are avoided, remedied, and mitigated in accordance with the Natural Environment and District Wide chapters of this Plan”, while recognising: <ul style="list-style-type: none"> a. The functional and operational needs of infrastructure; and b. That positive effects of infrastructure may be realised locally, regionally, or nationally. 	Oppose	
42.	INF - P2	<p>Amend the provision as follows</p> <ul style="list-style-type: none"> ● Add a new sub-clause x. whether there are alternative locations or a functional need to locate within an Overlay area or area of significant indigenous biodiversity or any area meeting the criteria in West Coast Regional Policy Statement, Appendix 1 ● f. The need to avoid, remedy, or mitigate adverse effects on the environment in accordance with the Natural Environment and District Wide chapters of this Plan” 	Oppose.	
43.	INF - P4	<p>Amend INF – P4 as follows: “Ensure that subdivision and development, is <u>can be</u> adequately serviced to meet the current and future needs including:</p> <p><u>A. In site selection and design considerations, assessing the adverse effects of subdivision and development as well as adverse effects of services when determining whether the subdivision or development should occur in that location in the</u></p>	Oppose.	

		<p><u>first place; and</u></p> <p><u>B. that adequate services includes:</u></p> <p>a. Safe and efficient vehicle access;</p> <p>...”</p>		
44.	Transport - Overview	The overview section is amended to ensure that it is consistent with the balance of the chapter and provides guidance as to the scope and application of the chapter. The exact amendments will depend on how the appeal points from Forest & Bird and other parties are resolved.	Oppose	
45.	TRN - O2	Replace “minimise” with “avoid, remedy or mitigate in accordance with the Natural Environment and District Wide chapters of this Plan.”	Oppose	
46.	ECO - Overview	<ul style="list-style-type: none"> ● Amend the Overview to clarify how the plan protects areas meeting RPS criteria that are not in Schedule Four. ● Explain approach to protection prior to the district wide assessment that will use NPSIB criteria. ● Amend the explanation stating that the “chapter includes specific rules that apply within significant natural areas, areas of high natural character, outstanding natural features and landscapes and the coastal environment”. Correct this to say “specific rule requirements” reflecting that there are not specific rules for all the areas listed. ● Amend references to RPS to “WRPS” consistent with references with ECO and SUB provisions. ● The wording “The WRPS is yet to be updated to give effect to the NPSIB” could be interpreted to suggest that the WRPS does not give effect, when in fact there is alignment on many matters already. <p>See attached tracked changes to decisions on ECO chapter in Appendix 1.</p>	Oppose	

47.	ECO - Overview - Plantation Forestry	Amend the overview in relation to Commercial Forestry to recognise that more stringent provisions can also be applied to indigenous biodiversity meeting the WRPS Appendix 1 significance criteria. This is because areas identified by using the RPS significance criteria come within the meaning of significant natural area under the NES for Commercial Forestry. See attached tracked changes to decisions on ECO chapter in Appendix 1.	Oppose	
48.	ECO -Overview - Strategic Objectives	Delete this statement or include it in other relevant chapters. Note that this change is not shown in changes to the ECO chapter in Appendix 1 given alternative options available.	Oppose	
49.	ECO - Overview - Wetlands on the West Coast	Amend the overview in relation to waterbodies to clarify that significant wetlands have been added into Schedule Four of this plan See attached tracked changes to decisions on ECO chapter in Appendix 1.	Oppose	
50.	ECO- O1 (now ECO- O5)	Replace reference to “Significant Natural Areas” with “significant indigenous vegetation and significant habitat of indigenous fauna” See attached tracked changes to decisions on ECO chapter in Appendix 1.	Oppose	
51.	New ECO-O3	Amend ECO-O3 to use wording “avoid, remedy or mitigate” rather than manage. Delete the word “significant” and amend to “indigenous biodiversity” See attached tracked changes to decisions on ECO chapter in Appendix 1.	Oppose	
52.	ECO - P1	<ul style="list-style-type: none"> • Amend ECO-P1.2(a) to include Grey District in the SNA identification process under Appendix Thirteen. • Add a new policy ECO-P2A providing for identification and 	Oppose	

		<p>protection of “area of significant indigenous biodiversity” using RPS criteria prior to the district wide mapping required by ECO-P1.</p> <ul style="list-style-type: none"> • See attached tracked changes to decisions on ECO chapter in Appendix 1. <p>Make any appropriate consequential changes to Appendix Thirteen.</p>		
53.	ECO - P2	<p>Amend policy ECO -P2 to include:</p> <ol style="list-style-type: none"> consideration of matters relevant to when provision for maintenance of improved pasture should be provided under clause 3.17 of the NPSIB reorder clause (d) so the same requirements apply to Poutini Ngāi Tahu land and specified Māori land. functional , operational need for the location and consideration of alterative in clause (e). to restate clause (f) limiting effects to no more than minor (original notified wording). <p>See attached tracked changes to decisions on ECO chapter in Appendix 1.</p>	Oppose	
54.	New ECO-P3	Delete ECO-P3	Oppose	
55.	ECO - P5 (now ECO-P6)	<p>Amend so that it is not limited to “significant values” and refers to “indigenous”</p> <p>See attached tracked changes to decisions on ECO chapter in Appendix 1</p>	Oppose	
56.	ECO - P6 (now ECO-P7)	Amend ECO-P7 to apply when consideration is given to whether to enabling or provide for an activity. This could be amended by amending the chapeau as follows:” In relation to all indigenous biodiversity, when considering subdivision, use and development,	Oppose	

		<p>including in resource consent applications, avoid activities will:...”</p> <p>Amend clause (d) to capture areas also meeting WRPs Significance criteria and clause 3.10(2)(a) of the NPSIB</p> <p>See attached tracked changes to decisions on ECO chapter in Appendix 1</p>		
57.	New ECO policy	<p>Add a new policy ECO-P8A setting out effects management hierarchy</p> <p>See attached tracked changes to decisions on ECO chapter in Appendix 1.</p>	Oppose	
58.	ECO - P7 (now ECO-P8)	<p>Amend ECO-P8:</p> <ul style="list-style-type: none"> • Clause (a) change back to critical infrastructure. • Delete clause (b) and (k) • Retain “or adjacent to” in clause (f). <p>See attached tracked changes to decisions on ECO chapter in Appendix 1.</p>	Oppose	
59.	ECO - P8 (now ECO-P9)	<p>Amend ECO-P9</p> <ul style="list-style-type: none"> • Add RPS Policy 8(a) wording. • Remove new sentence excluding the National Grid and REG from the policy requirements. <p>See attached tracked changes to decisions on ECO chapter in Appendix 1.</p>	Oppose	
60.	ECO - P10	<p>Amend ECO-P10 clause (c) to use directive terms from Policy 11(b) NZCPS wording and capture matters listed under 11(b) (vi):</p> <p>Avoiding significant adverse effects and avoiding, remedying or mitigating other adverse effects on indigenous vegetation, dunes,</p>	Oppose	

		<p>estuaries, coastal wetlands, habitats and species within the coastal environment, ecological corridors and areas important for linking or maintaining biological values.</p> <p>See attached tracked changes to decisions on ECO chapter in Appendix 1.</p>		
61.	New ECO-P11	Delete ECO-P11	Oppose	
62.	ECO Note	<p>Add a note at the start of the ECO rule section to clarify that <u>Significant Natural Areas listed in Schedule Four are shown in the Significant Natural Area overlay on the planning maps.</u></p> <p>See attached tracked changes to decisions on ECO chapter in Appendix 1</p>	Oppose	
63.	Decision new ECO-R1	<p>Amend new ECO-R1</p> <ul style="list-style-type: none"> • to clarify that these are standards and not a rule. • to clarify the standards apply to all permitted indigenous vegetation clearance rules outside Significant Natural Areas listed in Schedule Four. • Reduce clearance limits and set a clear limit that does not rely on a significance assessment. • remove the exceptions from the general standards. • Move the exceptions for natural hazard mitigation and planted vegetation to ECO-R6 and permitted activity conditions. <p>See attached tracked changes to decisions on ECO chapter. Specific relief set out in Appendix 1</p>	Oppose	
64.	Decision new ECO-R2	<p>Amend ECO-R2</p> <ul style="list-style-type: none"> • Clarify that Significant Natural Areas are those listed in Schedule Four 	Oppose	

		<ul style="list-style-type: none"> • Make the rule subject to compliance with the ECO – R1/S1 • Delete ECO-R2.4, relating to construction of new infrastructure, REG and National Grid. <p>See attached tracked changes to decisions on ECO chapter in Appendix 1.</p>		
65.	Decision new ECO-R3	<p>Amend ECO-R3</p> <ul style="list-style-type: none"> • Make the rule subject to compliance with the ECO – R1/S1 • Include the provisions on the maintenance of improved pasture as set out in Clause 3.17(2)(a) to (e) of the NPSIB. <p>See attached tracked changes to decisions on ECO chapter in Appendix 1</p>	Oppose	
66.	Decision new ECO-R4	<p>Amend ECO-R4</p> <ul style="list-style-type: none"> • Delete “not provided for in ECO-R1 or ECO-R2” from the title • Make the rule subject to compliance with the ECO – R1/S1 <p>See attached tracked changes to decisions on ECO chapter in Appendix 1.</p>	Oppose	GDC refers to its own appeal in relation to ECO – R4 and considers that its appeal points reflect the appropriate amendments to this rule.
67.	Decision new ECO-R5	<p>Amend ECO-R5</p> <ul style="list-style-type: none"> • Clarify rule with respect to schedule four and general standards in ECO – R1/S1 <p>See attached tracked changes to decisions on ECO chapter in Appendix 1.</p>	Oppose	
68.	Decision new ECO-R6	<p>Amend ECO-R6</p> <ul style="list-style-type: none"> • Clarify that Significant Natural Areas are those listed in Schedule 4 • Make the rule subject to compliance with the ECO – 	Oppose	

		<p>R1/S1</p> <ul style="list-style-type: none"> • Delete condition 12 relating to mineral extraction and prospecting • Delete condition 14 relating to clearance for any other purpose. <p>See attached tracked changes to decisions on ECO chapter in Appendix 1.</p>		
69.	Decision new ECO-R7	<p>Amend ECO-R7</p> <ul style="list-style-type: none"> • Clarify that Significant Natural Areas are those listed in Schedule 4 • Include reference to structures in condition 1.ii <p>See attached tracked changes to decisions on ECO chapter in Appendix 1.</p>	Oppose	
70.	ECO - R3 (now ECO-R8)	<p>Amend ECO-R8</p> <ul style="list-style-type: none"> • reinstate the restriction on clearance to being outside schedule four SNA except for existing forest at time of NPSIB commencement. • Replace advice note 1 with a condition to comply with general standard ECO-S1.2 • include General standards ECO-S1 should as a condition so that clearance limits apply. <p>See attached tracked changes to decisions on ECO chapter in Appendix 1</p>	Oppose	
71.	ECO - R5 (now ECO-R9)	<p>Amend ECO-R9</p> <ul style="list-style-type: none"> • Clarify that the rule only applies within Grey District by amending the heading so that it provides: "In the Grey District Indigenous vegetation clearance not meeting Permitted or 	Oppose	

		<p>Controlled Activity rules outside of a Significant Natural Area in Schedule Four</p> <ul style="list-style-type: none"> • Add matter for discretion: Effects on natural character, natural landscape and natural features in the coastal environment. <p>See attached tracked changes to decisions on ECO chapter in Appendix 1</p>		
72.	ECO - R7 (now ECO-R10) and new rule ECO-R11)	<p>Amend ECO-R10</p> <ul style="list-style-type: none"> • to ensure the rule provides for consideration of Regionally Significant Infrastructure, Renewable Energy Generation or the National Grid as a discretionary activity (replacing new ECO-R11). • delete ECO-R11 • delete condition 2 and the requirement under condition 4 to apply the effects management hierarchy. • remove condition 3 relating to WRPS Appendix 1 criteria and NPSIB clause 3.10(2) matters. • delete condition 4(a) and (b) relating to mineral and aggregate extraction so that these activities become non-complying where condition 1 is not met. • Add new ECO-P2A to provide direction relating to WRPS Appendix 1 criteria. • Amend ECO-P7 to capture the NPSIB clause 3.10(2) matters. <p>See attached tracked changes to decisions on ECO chapter in Appendix 1</p>	Oppose	
73.	ECO - R10 (now ECO-R13)	Amend ECO – R13 so that it is a prohibited activity.	Oppose	

		See attached tracked changes to decisions on ECO chapter in Appendix 1		
74.	ECO - R11 (now ECO-R14)	Amend ECO – R14 so that it is a prohibited activity. See attached tracked changes to decisions on ECO chapter in Appendix 1	Oppose	
75.	NFL R6, R8, R10, R11 ,R11(now R12) R12 (now R13), 15	Amend to include provision that requires compliance with the ECO provisions for any associated vegetation clearance.	GDC is not interested in this part of the proceeding.	
76.	NC Overview	The overview section is amended to ensure that it is consistent with the balance of the chapter. The exact amendments will depend on how the appeal points from Forest & Bird and other parties are resolved.	GDC is not interested in this part of the proceeding.	
77.	NC-O3	Amend NC – O2 as follows: "To <u>consider</u> providing for activities that have a functional need to locate in the margins of lakes, rivers, and wetlands, where they can be undertaken in a way that preserves natural character are <u>minimised</u> ."	GDC is not interested in this part of the proceeding.	
78.	NC – P2	Delete	GDC is not interested in this part of the proceeding.	
79.	NC-P3	Delete	GDC is not interested in this part of the proceeding.	
80.	NC-R2	Delete	GDC is not interested in	

			this part of the proceeding.	
81.	NC-R3	Change activity status to discretionary	GDC is not interested in this part of the proceeding.	
82.	FC-P1	Delete the words “to remedy or mitigate adverse effects created by the need to create”	GDC is not interested in this part of the proceeding.	
83.	FC-P2	Delete the words “the adverse effects and”	GDC is not interested in this part of the proceeding.	
84.	Overview	The overview section is amended to ensure that it is consistent with the balance of the chapter and provides guidance as to the scope and application of the chapter. The exact amendments will depend on how the appeal points from Forest & Bird and other parties are resolved.	GDC is not interested in this part of the proceeding.	
85.	SUB -R5	Amend Condition 1 as follows: “This is not within a Significant Natural Area listed in Schedule Four or an area of significant <u>indigenous biodiversity</u> subject to Rule SUB – R7” Clarify the meaning of “subject to SUB – R7”	GDC is not interested in this part of the proceeding.	
86.	SUB -R6	Amend Condition 1 as follows: “This is not within a Significant Natural Area <u>listed in Schedule Four</u> or an area of significant indigenous biodiversity ...” Clarify the meaning of “ and subject to SUB – R7”	GDC is not interested in this part of the proceeding.	

87.	SUB - R7/ECO - R4 (now SUB – R7)	Amend SUB-R7.2 as follows: "...unless the site has already been identified as a Significant Natural Area <u>listed in Schedule Four as part of a district – wide Significant Natural Area assessment process</u> ; and" Amend SUB – R7.4 as follow "...the need for clearance within the area of significant indigenous <u>biodiversity vegetation</u> to provide..."	GDC is not interested in this part of the proceeding.	
88.	SUB - R9/ECO - R6 (now SUB – R9)	Amend SUB-R9.2 as follows: "...unless the site has already been identified as an Significant Natural Area <u>listed in Schedule Four as part of a district – wide Significant Natural Area assessment process</u> ; and" Amend SUB – R9.4 as follow "...the need for clearance within the area of significant indigenous <u>biodiversity vegetation</u> to provide..."	GDC is not interested in this part of the proceeding.	
89.	SUB – R11	Amend SUB-R11.2 as follows: "The area has not been identified as an Area of Significant <u>indigenous</u> Biodiversity subject to...."	GDC is not interested in this part of the proceeding.	
90.	SUB - R15/ECO - R8 (now SUB – R16)	Amend Rule SUB-16.1 as follows: "...unless the site has already been identified as an Significant Natural Area <u>listed in Schedule Four as part of a district – wide Significant Natural Area assessment process using the NPSIB Appendix 1 criteria</u> ; and" Delete Rule SUB-16.2 Amend condition 3 to add that the subdivision must also achieve policy ECO-P7 and ECO-P10(a)	GDC is not interested in this part of the proceeding.	
91.	SUB – S2	Amend SUB-S2 to provide that building platforms and access have to be outside areas of significant indigenous biodiversity	GDC is not interested in this part of the proceeding.	
92.	SUB - S9	Change "or 20 m in width " to "of 20 m In width"	GDC is not interested in this part of	

			the proceeding.	
93.	CE - Overview	The overview section is amended to ensure that it is consistent with the balance of the chapter and provides guidance as to the scope and application of the chapter. The exact amendments will depend on how the appeal points from Forest & Bird and other parties are resolved.	Oppose	
94.	CE-O2	Delete	Oppose	
95.	CE – O3 (now CE-O4)	Amend so that it provides “To consider providing for activities which have a functional need to locate in the coastal environment where the impacts on significant indigenous biodiversity, outstanding natural character and outstanding natural features and landscapes are avoided, and other effects are avoided, remedied or mitigated.	Oppose	
96.	CE – P1	Amend to include urban areas that meet the policy in the coastal environment	Oppose	
97.	CE – P3	Amend the start of the policy so that it starts “Only consider allowing for ...”	Oppose	
98.	CE -P5	Amend the start of the policy so that it provides “Consider providing for”	Oppose	
99.	CE – P6	Amend the policy so that it provides “Recognise that there are existing settlements and urban areas located within the coastal environment of the West Coast/Te Tai o Poutini including parts of Westport, Greymouth and Hokitika, which are already modified by built development where new subdivision, buildings, and structures and expansion of towns and settlements may be appropriate.	Oppose	
100.	New policy	Include policy that gives effect to Policy 20 of the NZCPS	Oppose	
101.	CE-P7	Delete	Oppose	
102.	CE – P8	Delete	Oppose	

103.	CE-R17	Amend CE-R17.f so that it provides “adverse effects on indigenous biodiversity”	Oppose	
104.	EW Overview	The overview section is amended to ensure that it is consistent with the balance of the chapter and provides guidance as to the scope and application of the chapter. The exact amendments will depend on how the appeal points from Forest & Bird and other parties are resolved.		
105.	EW – R1	<u>Add a new condition</u> <u>8. Any vegetation clearance that is caused by the earthworks, or by the associated works (e.g., smothering by the excavated materials) must meet the Permitted Activity Standards of the ECO chapter.</u>	Oppose	
106.	EW – R6	Delete EW-R6 (the one with the struck through title)	Oppose	
107.	LIGHT – O2	Add significant indigenous biodiversity to Light- O2.f	Oppose	
108.	LIGHT - Rules	Amend LIGHT-R5 to ensure adequate protection for indigenous wildlife, including the Westland Black Petrel Colony near Punakaiki	Oppose	GDC refers to its own appeal in relation to Light-R5 and considers that its appeal points reflect the appropriate amendments to the rule.
109.	OSRZ Overview	The overview section is amended to ensure that it is consistent with the balance of the chapter and provides guidance as to the scope and application of the chapter. The exact amendments will depend on how the appeal points from Forest & Bird and other parties are resolved.	GDC is not interested in this part of the proceeding.	
110.	OSRZ - P2	Add the words “and protects natural values” at the end of the policy.	GDC is not interested in this part of the proceeding.	
111.	OSRZ - P4	Delete: ‘or where it has a link with the open space and recreation resource’.	GDC is not interested in this part of	

			the proceeding.	
112.	OSRZ - P12 (now P13) and P13 (now P14)	All PCL is zoned as NOSZ. Include in both OSRZ - P12 (now P13) and P13 (now P14) that the activities “protect the character, natural environment, indigenous biodiversity values and amenity values of the site and surrounding area”	GDC is not interested in this part of the proceeding.	
113.	OSRZ - P19	Amend to include more clarity on what is to be achieved by a. Replace ‘enable’ with ‘consider providing for’	GDC is not interested in this part of the proceeding.	
114.	NOSZ Overview	The overview section is amended to ensure that it is consistent with the balance of the chapter. The exact amendments will depend on how the appeal points from Forest & Bird and other parties are resolved.	GDC is not interested in this part of the proceeding.	
115.	RESZ – P13	Amend RESZ – P13 as follows: “...and areas of significant <u>indigenous</u> biodiversity unless adverse effects...”	GDC is not interested in this part of the proceeding.	
116.	RURZ O5	Delete.	Oppose	
117.	New objective	Include a new objective requiring the maintenance and protection of natural values in these zones.	Oppose	
118.	RURZ- P2	Reinsert the reference to significant natural features	Oppose	
119.	New policy or amend existing policies	Include a new policy requiring the maintenance and protection of natural values in these zones.	Oppose	

120.	GRUZ - R12	Delete	Oppose	
121.	GRUZ - R18	Amend GRUZ-R18.g (now R17) so that it provides "effects on indigenous biodiversity.	Oppose	
122.	BCZ – whole chapter	<p>Delete the Buller Coalfield Chapter and Zone and all related provisions and rezone the affected land as follows:</p> <ul style="list-style-type: none"> ● GRUZ for private land in pasture ● NOSZ for private land that has high natural values ● NOSZ for all public conservation land <p>In other cases, zone consistently with adjacent land zone as appropriate.</p>	GDC is not interested in this part of the proceeding.	
123.	MINZ – whole chapter	<p>Delete the Mineral Extraction Chapter and Zone and all related provisions and rezone the affected land as follows:</p> <ul style="list-style-type: none"> ● GRUZ for private land in pasture ● NOSZ for any private land that has high natural values ● NOSZ for all public conservation land <p>In other cases, zone consistently with adjacent land zone as appropriate.</p>	Oppose	
124.	Appendix 7	Delete	Oppose	
125.	Appendix 13	Any consequential amendments necessary to achieve the other outcomes sought in the appeal.	GDC is not interested in this part of the proceeding.	