

Taranaki Regional Council

Resource Management Act 1991

Further Submissions for the Proposed Coastal Plan for Taranaki

Further submissions on the Proposed Coastal Plan for Taranaki was publicly notified for submissions on 21 July 2018 with a deadline for further submissions on 8 August 2018. A total of 25 further submissions were received by the Council. The index on the following page gives the submitter name (with original submitter number in brackets) and the page number where their further submission can be found. The original submitter number is given to assist users with cross referencing against other documents.

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Federated Farmers of New Zealand

Further submission to the Taranaki Regional Council on the Proposed Coastal Plan for Taranaki

31 July 2018



To: Taranaki Regional Council

Name of submitter: Federated Farmers of New Zealand

Contact person: Lisa Harper
Regional Policy Advisor

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1. Federated Farmers could not gain an advantage in trade competition through this submission. If others make a similar submission, we would be prepared to consider presenting a joint case with them at any hearing.
2. Taranaki Federated Farmers welcomes this chance to make further submissions on the proposed Coastal Plan. We made submissions on these plan changes in March 2018. We would like to take this opportunity to make further submissions on some points raised within the submissions of other parties involved in the plan review process. This further submission provides Federated Farmers' views on points raised that are not already covered in our original submission.

Federated Farmers wishes to be heard in support of this submission.
Thank you.

Submitter	Submission no.	Provision and/or topic	Support/oppose/neutral	Reason	Relief sought
Trans-Tasman Resources Limited	6	Policies 11 & 13; Coastal water & air quality	Support in part	Policies currently require the maintenance and enhancement of water and air quality. We agree with TTR, who prefer reference to maintenance <u>or</u> enhancement, 'as enhancement is not required under the RMA or higher order policy documents in all cases'.	Accept submission
		Policy 16; Relationship of tangata whenua	Support in part	For reasons given by submitter	Accept submission
Silver Fern Farms	8	Policy 22, rules 6 & 13; Discharge of contaminants to coastal waters	Support	For reasons given by submitter; at present no other practical options are available than to discharge to coastal waters. Meat processing plants operated by SSF are essential infrastructure to the farming sector in Taranaki.	Accept submission
Department of Conservation	29	Policy 14; Biodiversity, mapping	Support in part	We agree that mapping areas of significant indigenous biodiversity is helpful to plan users, although we are aware that there may be resource or practical constraints. For example, some biodiversity may be small in extent and/or mobile and can	That Council consider mapping as an alternative to using a schedule of significant species and ecosystems.

3

				<p>therefore be difficult to map. Significant Natural Areas on land have also been mapped by District Councils.</p> <p>We disagree that the approach of protecting 'areas' is inadequate.</p>	
		Policy 18; Amenity	Oppose	The relief sought is very broad. Amenity on the coast is also adequately managed in District Plans.	Reject submission
Forest and Bird	43	Natural character	Oppose	<p>Identification of areas of natural character is already a feature of the relevant District Plans. It is unclear what value could be gained by repeating the process, or by the additional provisions sought.</p> <p>Relief sought for Objective 6, that natural character is '<i>restored where degraded appropriate</i>' is aspirational, but 'appropriate' is a necessary qualifier.</p> <p>Relief sought for Policy 9 ('<i>avoiding adverse effects...</i>', with no qualification) does not reflect that some adverse effects on natural character may be allowable in some circumstances.</p>	Reject submission

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		Biodiversity	Support in part	We support identification of the values and characteristics that contribute to the significance of areas of significant biodiversity.	Consider identification of the characteristics and values that contribute to the significance of areas of significant biodiversity.
		Biodiversity, significance criteria	Oppose in part	<p>Manuka, kanuka and rata have recently been re-classified as 'threatened', as a precautionary measure, following the arrival in New Zealand of the disease myrtle rust. Otherwise these plants are common and often behave as agricultural weeds in farmland.</p> <p>We recognise that protection of coastal vegetation is important. However, we would be concerned if the change in classification status of these plants, coupled with significance criterion b(ii) in F&B's appendix 3 (relating to vegetation and habitat supporting a threatened or at risk species), make clearance of regenerating pasture on the coast more difficult for farmers.</p>	<p>Enable the clearance of regenerating pasture in the coastal environment.</p> <p>In significance criteria or their application, make note that manuka and kanuka are not included in provisions, where their threatened status is due to the introduction of myrtle rust.</p>
Powerco	45	Definition of reverse sensitivity	Support in part	We support the principle behind proposed changes,	Accept submission in part.

				for reasons given by submitter. However, the phrase 'in their vicinity' is useful and we submit it should be retained. We would also omit the proposed 'or intensification', as this would be hard to judge and may catch relatively minor changes in activities.	
		Policy 10; Restoration of natural character	Support	For reasons given by submitter	Accept submission
Oil Companies	46	Objective 8; indigenous biodiversity	Support	FFNZ has similar concerns to the submitter, in relation to farming activities.	Accept submission
Fonterra	47	Policy 2; Integrated management	Support	For reasons given by submitter	Accept submission
		Policy 6; Activities important to the well-being of people and communities	Support	For reasons given by submitter	Accept submission

END

**FURTHER SUBMISSION IN OPPOSITION OF SUBMISSIONS ON THE PROPOSED
COASTAL PLAN FOR TARANAKI**

Clause 8 of Schedule 1, Resource Management Act 1991

To Taranaki Regional Council

Name of person making further submission: *Radio New Zealand Limited (RNZ)*

- 1 This is a further submission in support and opposition to the submissions on the Proposed Coastal Plan for Taranaki (the *Proposed Plan*).
- 2 RNZ is a submitter on the Proposed Plan.
- 3 RNZ supports and opposes the submission by Royal Forest and Bird Protection Society of New Zealand Incorporated (*Forest and Bird*) on the Proposed Plan, as set out in **Appendix 1**.
- 4 RNZ does not wish to be heard in support of this further submission.

Signed for and on behalf of Radio New Zealand Limited by its solicitors and authorised agents Chapman Tripp



Ben Williams
Partner
1 August 2018

Address for service of submitter:

Radio New Zealand Limited
c/- Gary Fowles
PO Box 123
Wellington
Email address: gary.fowles@radionz.co.nz

APPENDIX 1

Submitter name	Plan Provision	Submission	RNZ support/oppose submission, and reasons	Relief sought by RNZ
43 – Royal Forest and Bird Protection Society	Objective 3 – Reverse sensitivity	<p>Delete Objective 3:</p> <p><i>The use and ongoing operation of nationally and regionally important infrastructure and other existing lawfully established activities is protected from new or inappropriate use and development in the coastal environment.</i></p>	<p>Oppose – RNZ considers that there must be objectives in the Proposed Plan which protect nationally and regionally important infrastructure from reverse sensitivity. As a lifeline utility, it is essential that continues operation, maintenance and improvement of RNZ’s national transmission network can occur unimpeded.</p>	<p>Retain Objective 3 as notified.</p>
43 – Royal Forest and Bird Protection Society	Policy 2 – Integrated management	<p>Support Policy 2 with amendment:</p> <p><i>Provide for the integrated management of the coastal environment by:</i></p> <p><i>(a) implementing policies under section 5.1 of the Plan in managing the <u>location, form and limits effects</u> of activities (positive and negative) undertaken in the coastal marine area <u>to protect and preserve the indigenous biodiversity, natural character, natural feature and landscape or significant</u> values and characteristics of the wider coastal environment; [...]</i></p> <p>Add a new clause for the reverse of clause (a), to provide for the integration of activities on land that may adversely affect these values in the coastal marine area.</p>	<p>Oppose – RNZ submits that the wording of (a) as notified is already consistent with the policies in the New Zealand Coastal Policy Statement 2010 (NZCPS). Further, the policy does not create uncertainty and is sufficiently clear.</p>	<p>Retain Policy 2 as notified.</p>

Submitter name	Plan Provision	Submission	RNZ support/oppose submission, and reasons	Relief sought by RNZ
43 – Royal Forest and Bird Protection Society	Policy 4 – Extent and characteristics of the coastal environment	<p>Amend Policy 4 to capture the extent and characteristics in Policy 1 of the NZCPS.</p> <p>Alternatively amend the policy to refer to the extent of the coastal environment set out on the planning maps and that the maps identified the extent consistent with the extent and characteristic in policy 1 of the NZCPS within Taranaki. Allow that case by case consideration may be undertaken through consent processes consistent with in Policy 1 NZCPS.</p>	<p>Support in part/oppose in part – In part, RNZ agrees with the general sentiment of Forest and Bird’s submission, that there may be issues that arise from determining the extent of the coastal environment on a “case by case basis.”</p>	<p>RNZ consider (despite the desirability of doing so) it is not possible to accurately identify the extent of the coastal marine environment in every given case. RNZ is therefore effectively neutral to the relief sought by Forest and Bird.</p>
43 – Royal Forest and Bird Protection Society	Policy 9 – Natural character and natural features and landscapes	<p>Amend Policy 9 to include an additional clause reflecting Policy 13(1)(a) and 15(a) of the NZCPS:</p> <p><i><u>(x) avoiding adverse effects of activities on natural character of the coastal environment with outstanding natural character and on outstanding natural features;</u></i></p> <p>Amend clause (v) as follows:</p> <p><i><u>(v) maintains the integrity of significant areas of indigenous vegetation protects significant indigenous biodiversity and</u></i></p>	<p>Oppose in part – RNZ opposes the amended wording on clause (v) and submits that the notified wording of the Proposed Plan is consistent with the NZCPS.</p>	<p>Retain Policy 9 as notified.</p>

Submitter name	Plan Provision	Submission	RNZ support/oppose submission, and reasons	Relief sought by RNZ
		<i><u>maintains or enhances indigenous biodiversity;</u></i>		
43 – Royal Forest and Bird Protection Society	Method 6.3 – Use and development of resources	Support in part but opposed to the use of the term “appropriate use”	Oppose – RNZ considers the reference to “appropriate use” of the coastal environment is in line with the NZCPS.	Retain Method 6.3 as notified.

Grace Marcroft

From: noreply@mailgun.trc.govt.nz
Sent: Thursday, 2 August 2018 9:57 AM
To: Coastal
Subject: Further submission on Proposed Coastal Plan

Your name

Bruce Boyd

Organisation (if applicable)

Project Reef- Life & South Taranaki Underwater Club

Address

202A Turuturu Road, Hawera
Hawera

Daytime phone number

02102761723

Email address

boydsnest2@gmail.com

Declaration of status

I am or represent a person who has an interest in the proposal that is greater than the interest that the general public has

Explain why you are claiming this status

I am joint project lead for the South Taranaki Underwater Clubs 'Project Reef-Life.

Do you wish to be heard in support of your submission?

No

Original submission (submitter name) to which your further submission relates

Trans-Tasman Resources

Particular part/s of the original submission to which your further submission relates

Policy 8: Areas of outstanding value. Page 28 of Public Submissions. Page 6 of TTRL submission.

Please select one

Oppose

The reasons you support or oppose the original submission

TTRLs submission opposes the inclusion of the Project Reef on the ground's that there does not appear to be sufficient evidential basis to support the classification of an ONC.

I firmly believe the Project Reef-Life team has provided sufficient evidence to the TRC to meet the requirements.

This evidence has been by way of both in-situ video recording's, general video and photographs of the reef and it's communities, together with acoustic recordings, benthic surveys, identification and classification of numerous sponge, hydroid and bryozoan samples, all verified by some of New Zealand's premier experts.

The mere existence of this reef is evidence enough to include as an ONC, with all the resources of TTRL and Niwa, during their extensive survey of this same coastal area, they only succeeded to locate two low lying sand inundated rocks referred to as 'Rocky Reef' in their submission to the EPA. This alone indicates the Project Reef is an area of Outstanding Natural Character in this particular part of the South Taranaki Bight.

The decision you seek

I wish for the Project Reef to remain as an inclusion in the TRC Coastal Plan

Do you want to comment on another original submission?

No

Second further submission

Original submission (submitter name) to which your further submission relates

Particular part/s of the specific submission to which your further submission relates

Please indicate clearly which parts of the original submission you support or oppose, together with any relevant Proposed Plan provisions (delete and replace this text) .

Please select one

The reasons you support or oppose the original submission

The decision you seek

I wish to comment on a third specific submission

No

Third further submission

Original submission (submitter name) to which your further submission relates

Particular part/s of the specific submission to which your further submission relates

Please indicate clearly which parts of the original submission you support or oppose, together with any relevant Proposed Plan provisions (delete and replace this text) .

Please select one

The reasons you support or oppose the original submission

The decision you seek

I wish to comment on a fourth specific submission

No

Fourth further submission

Original submission (submitter name) to which your further submission relates

Particular part/s of the specific submission to which your further submission relates

Please indicate clearly which parts of the original submission you support or oppose, together with any relevant Proposed Plan provisions (delete and replace this text) .

Please select one

The reasons you support or oppose the original submission

The decision you seek

I wish to comment on a fifth specific submission

No

Fifth further submission

Original submission (submitter name) to which your further submission relates

Particular part/s of the specific submission to which your further submission relates

Please indicate clearly which parts of the original submission you support or oppose, together with any relevant Proposed Plan provisions (delete and replace this text) .

Please select one

Further Submissions Form – Proposed Coastal Plan for Taranaki

Use this form for multiple further submissions on the Proposed Coastal Plan for Taranaki.

Important:

- Further submissions can be made only by a person/organisation representing a relevant aspect of the public interest, or a person/organisation whose interest in the proposal is greater than that of the general public
- Further submissions can only be made in support or opposition of an existing submission and must not raise any new points.
- You are obliged to notify the original submitters to whom your further submissions relate. [Find their email address here](#)

Email your further submissions to coastal@trc.govt.nz with 'Proposed Coastal Plan further submission' in the subject field.

Submissions close at 4pm on Saturday 4 August 2018

3 Your details

Name: Organisation (if applicable): **Transpower New Zealand Ltd,**

Address: **PO Box 1021, Wellington**

Address for Service: **Boffa Miskell Ltd, PO Box 11340, Wellington 6142, Attn: Pauline Whitney,**

Daytime phone number: **0210 236 4245 / 04 901 4290**

Email address: **pauline.whitney@boffamiskell.co.nz**

Select one status:

I am or represent a person/organisation representing a relevant aspect of the public interest ~~YES~~/**NO**

I am or represent a person/organisation whose interest in the proposal is greater than that of the general public **YES**

Explain why you claim this status: **Transpower NZ Ltd is the owner and operator of the National Grid. The need to operate, maintain, develop and upgrade the National Grid is identified as a matter of national significance under the National Policy Statement on Electricity Transmission 2008. Transpower also has an interest as a landowner and occupier.**

Do you wish to be heard in support of your further submission? **YES**

Plan Reference	Who made the original submission point?	Please state the original submission point and indicate clearly what part of the proposed Plan it relates to.	Oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
Plan – Tangata whenua	50 – Te Kāhui o Taranaki Trust	Amend Plan to require that all Iwi (hapū, marae/pā) are notified as an affected party to any activities occurring within, adjacent to, or impacting directly on Statutory Acknowledgements and historic heritage sites and sites of significance to Māori within the coastal marine area.	Oppose	The submission point seeking mandatory notification is opposed. The RMA does not require or provide for mandatory notification for all activities. Rather, the requirement for notification is governed by s95A and s95B of the RMA and informed by the activity status and the effects of an activity. The submission point is also opposed as it is unclear and therefore open to interpretation what constitutes an ‘adjacent’ activity, or ‘impacting directly on’. Specific to Statutory Acknowledgments, Transpower acknowledges a determination regarding notification is required for Statutory Acknowledgments. However, given this is presently provided for under s95B of the RMA, compulsory notification under the proposed plan is not considered appropriate.	Reject the amendment sought
Section 1.4.2– The coastal environment	43 – Royal Forest and Bird Protection Society	Support the scope of the Plan and Plan provisions for integrated management but seek that paragraph 2 of Section 1.4.2 be amended to clarify that the rules in this Plan apply to activities in the CMA, including where those activities may have an adverse effect on outstanding values and significant indigenous biodiversity values outside of the CMA.	Oppose in part	In its submission Transpower supported the statement within Section 1.4.2 of the proposed plan that the rules only apply in the CMA. On this basis Transpower opposes the insertion of a reference as sought by the submitter, for controls extending outside the CMA as such an insertion would confuse plan users and not assist in plan interpretation or application. Furthermore, such values outside the ambit of regional plans are governed under the district plan or regional plans, not the Regional Coastal Plan.	Reject the amendment sought in part in relation to activities outside the CMA
Section 2.2 – New Zealand Coastal Policy Statement	45 – Powerco	Amend Section 2.2 to specifically recognise and provide for infrastructure. This could be achieved by adding an additional point: <i>Recognising and providing for infrastructure</i>	Support	The submission point is supported as it appropriately recognises infrastructure as recognised in Policy 6(1)(a) of the NZCPS 2010.	Accept the amendment sought
Section 3.1 – Taranaki coastal environment	43 – Royal Forest and Bird Protection Society	Amend Section 3.1 by: deleting the text under “ <i>Appropriate use and development</i> ”. Alternatively amend to address as per submitters previous comments made on this matter.	Oppose	The submission point is opposed as the removal of the section would remove recognition within the proposed plan that some activities rely on a coastal location. Such functional need based activities are recognised in Policy 6 of the NZCPS. (Noting that Transpower sought amendment to Section 3.1 in its submission to provide reference to technical, operational or locational constraints). Policy 3 of the NPSET also requires decision makers to consider the constraints imposed by technical, operational and/or locational requirements of the National Grid. The recognition of the public benefit of the National Grid is further recognised in Policy 1 of the NPSET.	Reject the amendment sought

Plan Reference	Who made the original submission point?	Please state the original submission point and indicate clearly what part of the proposed Plan it relates to.	Oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
Objective 2 – Appropriate use and development	43 – Royal Forest and Bird Protection Society	Amend Objective 2 to read: Objective 2: Appropriate <u>Efficient use and development</u> <i>Natural and physical resources of the coastal environment are used efficiently, and activities that depend on the use and development of these resources, are provided for in appropriate locations.</i>	Oppose	Objective 2 of the proposed Regional Coastal Plan seeks two outcomes – the efficient use of resources, and the location of activities in appropriate locations. The submission point is opposed as reference to ‘appropriate locations’ is consistent with Policy 6(2)(c) of the NZCPS which relates to functional need and activities in appropriate places. In its submission on Objective 2, Transpower sought reference to technical, operational and/or locational requirements thereby making it clear that activities (such as the National Grid) which may have technical, operational and/or locational constraints and are required to be located in the coastal environment due to these requirements, are recognised.	Reject the amendment sought
Objective 3 – Reverse sensitivity	43 – Royal Forest and Bird Protection Society	Amend the Plan by deleting Objective 3: The use and ongoing operation of nationally and regionally important infrastructure and other existing lawfully established activities is protected from new or inappropriate use and development in the coastal environment.	Oppose	The submission point is opposed on the basis Objective 3 as notified recognises the need to protect nationally and regionally important/significant infrastructure from third party activities. The objective as notified gives effect to the Taranaki Regional Policy Statement INF Policy 2 ¹ , and Policy 10 of the NPSET which relates to third party activities and ensuring the ‘operation, maintenance, upgrading and development’ of the National Grid is not compromised.	Reject the amendment sought
Objective 3 – Reverse sensitivity	45 – Powerco	Amend Objective 3 to read: <i>The use and ongoing operation, maintenance, and upgrading of nationally and regionally important infrastructure and other existing lawfully established activities is protected from new or inappropriate use and development in the coastal environment.</i>	Support	The submission point is supported as it recognises the need to protect existing nationally and regionally important infrastructure from other activities. The objective gives effect to the Taranaki Regional Policy Statement INF Policy 2, and Policy 10 of the NPSET, which relates to third party activities and the need to ensure the ‘operation, maintenance, upgrading and development’ of the National Grid is not compromised.	Accept the amendment sought
Objective 6 – Natural character	43 – Royal Forest and Bird Protection Society	Amend Objective 6 to read: <i>The natural character of the coastal environment is preserved and protected from inappropriate subdivision, use and development and is restored where appropriate degraded.</i>	Oppose in part	The submission point is opposed in part in relation to the sought replacement of the term ‘appropriate’ with ‘degraded’ on the basis the sought wording is not consistent with, and does not give effect to, Policy 14(c) of the NZCPS. Policy 14(c) of the NZCPS requires that ‘where practicable, and where degraded areas require restoration or rehabilitation’, a number of possible approaches are provided within the policy. Policy 14(c) does not require that restoration or rehabilitation is an absolute requirement for any and every degraded area, as would be the outcome sought in	Reject the amendment sought in relation to replacement of the term ‘appropriate’ with ‘degraded’.

¹ INF POLICY 2

The adverse effects of subdivision, use and development on the safety, efficiency, operation, maintenance and upgrading of the region’s network utilities and on other physical infrastructure of regional significance (including where this is of national importance) will be avoided or mitigated.

Plan Reference	Who made the original submission point?	Please state the original submission point and indicate clearly what part of the proposed Plan it relates to.	Oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
				this submission point. On this basis Transpower opposes the submission point and instead supports the retention of the Objective as notified and sought in the Transpower submission.	
Objective 8 – Indigenous biodiversity	45 – Powerco	Seek that Objective 8 (and corresponding policies and rules) provide appropriately for the operation, maintenance and upgrade of existing regionally important infrastructure.	Support	As outlined in the submission, the proposed plan does not map areas of significant indigenous biodiversity. On this basis Transpower supports recognition within Objective 8 (as well as the policy and rule framework) of regional important/significant infrastructure.	Accept the submission point
Objective 13 – Coastal hazards risk and public health and safety	46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	Amend Objective 13 to read: <i>The risk of social, cultural, environmental, and economic harm from coastal hazards is not increased to unacceptable levels and public health, safety and property is not compromised by use and development of the coastal marine area</i>	Support	The submission point is supported as it appropriately recognises there may be circumstances and situations in which use of the CMA may increase the risk from coastal hazards, but the risk is not to an unacceptable level. For example, a new National Grid support structure in the CMA may even by a small degree increase the harm (for example from a Tsunami) but this level and degree of harm is acceptable	Accept the amendment sought
Policy 1 – Coastal management areas	45 – Powerco	Support Policy 1 subject to an amendment that recognises the existence of existing infrastructure in areas of Outstanding Value, Estuaries Unmodified and Estuaries Modified, unless the mapping is amended such that this is not the case. Seek amendment to policies 1(a), 1(b) and 1(c) to read: <i>These areas may contain regionally important infrastructure.</i>	Support	The submission point is supported on the basis that given the Coastal Environment is not specifically mapped and therefore defined, there may be regionally important/significant infrastructure within the Coastal Environment. On this basis, specific recognition within the policy as to the presence of regionally important/significant infrastructure is supported.	Accept the amendment sought
Policy 1 – Coastal management areas	47 – Fonterra	Amend Policy 1 to include a new Clause (d)(v) that reads: Manage the coastal marine area in a way that recognises that some areas have values, characteristics or uses that are vulnerable or sensitive to the effects of some activities, or that have different management needs than other areas. [...] (d) Open Coast: Areas of the open coast not identified in (a), (b), (c) and (e) of this Policy characteristically: [...] (v) <i>may contain infrastructure, structures and activities that enable people and communities to provide for their economic and social wellbeing</i>	Support	The submission point is supported on the basis it would recognise the presence of infrastructure and activities in the Open Coast that are necessary to enable people and communities to provide for their economic and social wellbeing. Specific to the National Grid, such recognition would give effect to NPSET Policy 1 which the benefits of sustainable, secure and efficient electricity transmission be recognised and provided for.	Accept the amendment sought
Policy 2 – Integrated management	46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	Support Policy 2 subject to the amendment of Policy 2(f) to read: <i>Provide for the integrated management of the coastal environment by: [...] (f) managing natural and physical coastal resources in a manner that has regard to the social, economic and cultural objectives and wellbeing of the community and the functional need and/or location constraints of nationally or regionally important infrastructure; and [...]</i>	Support	The submission point is supported as it appropriately refines the policy. In particular the reference to ‘need’ is supported as it reflects the terminology used in the NZCPS. The amendments sought by the submitter would align with the amendments sought in Transpower’s submission and on this basis, are supported in addition to the relief sought by Transpower.	Accept the amendment sought

Plan Reference	Who made the original submission point?	Please state the original submission point and indicate clearly what part of the proposed Plan it relates to.	Oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
Policy 4 – Extent and characteristics of the coastal environment	45 – Powerco	Amend Plan by deleting Policy 4 and referring to a comprehensive map of the coastal environment in its place: <i>Policy 4: Extent and characteristics of the coastal environment to determine the inland extent of the coastal environment for the purposes of policies under Section 5.1 of the Plan on a case by case basis by having regard to: (a) areas where coastal processes, influences or qualities are significant, including coastal lakes, lagoons, tidal estuaries, saltmarshes, coastal wetlands and the margins of these areas; and (b) the geographic extent to which activities within the coastal marine area may cause adverse effects on significant values and characteristics landward of the coastal marine area.</i>	Support	The submission point is supported on the basis mapping of the Coastal Environment would assist in plan interpretation and application in that plan users would be able to readily ascertain whether they are within the Coastal Environment. Transpower agrees with the reasoning provided in the Powerco submission that it is neither efficient nor effective to require the coastal environment to be defined on a case by case basis. Such an approach will lead to significant costs and uncertainties, including disputes as to whether the proposed plan is relevant to a particularly activity.	Accept the amendment sought
Policy 5 – Appropriate use and development of the coastal environment	47 – Fonterra	Amend Policy 5(a) to read: <i>Determine whether use and development of the coastal environment is in an appropriate place and form and within appropriate limits by having regard to: (a) the functional need or operational requirement of the activity to be located in the coastal marine area. Conversely, activities that do not have a functional need or operational requirement to be located in the coastal marine area generally should not be located there (unless the non-marine related activity complements the intended use and function of the area); [...]</i>	Support in part	Transpower’s submission sought an amendment to Policy 5 to include (in part) reference to ‘technical, operational and/or locational requirements’. Should this recommendation not be granted, Transpower supports the relief sought by Fonterra to insert ‘operational requirement’ as it provides clarity as to what is envisaged as appropriate in the CMA. This is particularly relevant given the lack of a definition of ‘functional need’ in the policy itself or in proposed plan. The inclusion of ‘operational requirement’ within the policy would give effect to Policy 3 of the NPSET which requires consideration of the constraints imposed by technical and operational requirements when considering measures to avoid, remedy or mitigate adverse effects of the National Grid.	Accept the amendment sought in part should the relief sought in Transpower’s submission not be accepted
Policy 5 – Appropriate use and development of the coastal environment	43 – Royal Forest and Bird Protection Society	Concern regarding the application of Policy 5 and seek amendment to the Plan to better provide for Policies 11, 13, 15, 17 and 20 of the NZCPS and achieve Plan objectives by identifying: <ul style="list-style-type: none"> - appropriate places or specify appropriate forms or limits - any areas where particular activities are inappropriate - appropriate places for aquaculture. 	Oppose	The submission point is opposed. In its submission Transpower supported Policy 5 (with amendment) on the basis it provides a policy framework for consideration as to whether an activity is an appropriate use or development in the coastal environment. Proposed plan Policy 5 (and in particular clauses (a), (b) and (c)) implements the outcome sought in Objective 2, and Taranaki Regional Policy Statement INF Objective 1 and INF Policy 1. Functional need and benefits are also recognised in Policy 6 of the NZCPS. Specific to the National Grid, NPSET Policy 1 requires the benefits of the National Grid be recognised and provided for, and Policy 3 requires decision makers to consider the constraints imposed by the technical and operational requirements. Both NPSET Policy 1 and Policy 3 are given effect to through proposed plan Policy 5.	Reject the amendment sought

Plan Reference	Who made the original submission point?	Please state the original submission point and indicate clearly what part of the proposed Plan it relates to.	Oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
Policy 6 – Activities important to the wellbeing of people and communities	43 – Royal Forest and Bird Protection Society	Amend Policy 6 to: - provide for new infrastructure as set out in the National Policy Standard – Electricity Transmission - provide for activities regulated under the National Environmental Standards - provide for maintenance to enable the safe operation of existing regionally important infrastructure - provide for new regionally important infrastructure consistent with Policy 5 (subject to submitter’s amendments) - provide for activities subject to appropriate avoidance, remediation or mitigation of adverse environmental effects.	Support in part	In its submission Transpower supported Policy 6 with amendment. The submission by Royal Forest and Bird Protection Society is supported in part in so far as it is consistent with the relief sought by Transpower in its overall submission. However, Transpower recognises the importance of other infrastructure of regional importance or significance and the requirement to give effect to Taranaki Regional Policy Statement INF Objective 1 and INF Policy 1.	Accept the amendment sought in part in so far as it is consistent with the relief sought in Transpower’s submission
Policy 7 – Impacts on established operations and activities	45 – Powerco	Amend Policy 7 to read: <i>Avoid, remedy or mitigate the adverse effects of activities, including reverse sensitivity impacts, on existing lawfully established activities</i> <i>Restricting the establishment or intensification of activities that may result in reverse sensitivity effects by:</i> <i>(a) avoiding significant adverse effects on infrastructure of national or regional importance</i> <i>(b) avoiding, remedying or mitigating other adverse effects on infrastructure of national or regional importance</i> <i>(c) avoiding, remedying or mitigating adverse effects on other activities</i>	Support	While Transpower submitted in support of Policy 7, it agrees with the concerns raised in the Powerco submission that Policy 7 as notified does not give full effect to proposed plan Objective 3, or INF Policy 2 of the Taranaki Regional Policy Statement, both of which are which are directive in nature. Specific to the National Grid, Policy 10 of the NPSET requires that not only reverse sensitivity effects on the National Grid be avoided, but also that the operation, maintenance, upgrading and development of the National Grid is not compromised. On this basis, the wording sought in the Powerco submission is supported.	Accept the amendment sought
Policy 8 – Areas of outstanding value	45 – Powerco	Amend Policy 8 by adding a new Clause (c) to read: Protect the visual quality and the physical, ecological and cultural integrity of coastal areas of outstanding value identified in Schedule 1 from inappropriate use and development by: [...] (<i>c) recognising the need to provide for the ongoing operation, maintenance, and upgrade of existing infrastructure.</i>	Support	In its submission Transpower sought an amendment to Policy 8 to provide specific to the National Grid. The wording sought in Transpower’s submission is preferred but should the Transpower submission point not be accepted, Transpower supports the relief sought by Powerco to recognise the need for infrastructure.	Accept the amendment sought
Policies 8 to 15 – Natural and historic heritage and values	41 – Te Korowai o Ngāruahine Trust	Amend Policies 8 to 15 to delete reference to significant adverse effects and replace with adverse effects.	Oppose	The submission point for the removal of ‘significant adverse effects’ from Policies 8 to 15 is opposed. Transpower supports the hierarchy approach within the proposed plan for avoiding ‘adverse effects’ for those environments which require a greater level of protection, and avoiding ‘significant adverse effects’ for those environments requiring less absolute protection (with other adverse effects to be avoided, remedied or mitigated). The approach adopted within the proposed plan gives effect to the Taranaki Regional Policy Statement.	Reject the amendment sought

Plan Reference	Who made the original submission point?	Please state the original submission point and indicate clearly what part of the proposed Plan it relates to.	Oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
				Proposed plan Policy 14 also gives effect to NZCPS Policy 11.	
Policy 9 – Natural character and natural features and landscapes	45 – Powerco	Revisit mapping areas of natural character and natural features and landscapes OR Amend Policy 9 by adding a new Clause (ix) to read: <i>Protect the visual quality and the physical, ecological and cultural integrity of coastal areas of outstanding value identified in Schedule 1 from inappropriate use and development by: (a) avoiding significant adverse effects, and avoiding, remedying or mitigating other adverse effects on natural character and natural features and landscapes by having regard to the extent to which the activity: [...]</i> <i>(ix) is necessary to provide for the safe and efficient operation, maintenance, upgrade and development of regionally important infrastructure.</i>	Support	The submission point is supported on the basis the sought text appropriately requires regard be had to regionally important/significant infrastructure. Such recognition would give effect to NPSET Objective 1 and Policy 2 in relation to the National Grid.	Accept the amendment sought
Policy 10 – Restoration of natural character	45 – Powerco	Retain Policy 10 as notified	Support	The submission point is supported on the basis it requires the ‘promotion’ of restoration or rehabilitation of natural character.	Accept the amendment sought
Policy 27 – Discharges of stormwater	46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	Retain Policy 27 as notified.	Support	The submission point is supported on the basis it provides an appropriate policy framework for managing stormwater discharges.	Accept the amendment sought
Method 6 – Use and development of resources	43 – Royal Forest and Bird Protection Society	Support in part but opposed to the use of the term “appropriate use and development	Oppose	The submission point is opposed as Method 6.3 as notified reflects that there are some activities which are appropriate in the CMA. The National Grid is such an activity, the national significance of which is recognised in the NPSET.	Reject the amendment sought
Rule 13 – Other discharges	46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	Retain Rule 13 subject to the addition of a note as follows: <u>A discharge into a district council managed stormwater system is a discharge to land outside the CMA and an assessment for consent requirement should be made under the Freshwater Plan not this rule.</u>	Support	The submission point is supported as it clarifies that discharges into the council stormwater network are not subject to the proposed plan. The insertion of the note would assist in plan interpretation and application.	Accept the amendment sought
Rule 14 – Other discharges	46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	Retain Rule 14 subject to the addition of a note to read: <u>A discharge into a district council managed stormwater system is a discharge to land outside the CMA and an assessment for consent requirement should be made under the Freshwater Plan not this rule.</u>	Support	The submission point is supported as it clarifies discharges into the council stormwater network are not subject to the proposed plan. The insertion of the note would assist in plan interpretation and application.	Accept the amendment sought

Plan Reference	Who made the original submission point?	Please state the original submission point and indicate clearly what part of the proposed Plan it relates to.	Oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
Rule 22 – Network utility structure erection or placement	43 – Royal Forest and Bird Protection Society	Amend Rule 22 by changing the rule classification to make the erection or placement of network utility structures in the CMA a Restricted Discretionary Activity (rather than a Controlled Activity).	Oppose	The submission point is opposed. In its submission Transpower supported the notified controlled activity status for new network utility structure erection or replacement outside significant areas on the basis such an activity status provides an appropriate regulatory framework for considering the effects of such activities and recognises the importance and role of network utilities. It is noted that the nature and scale of the network utilities are restricted within the rule, with larger and more significant structures and activities addressed under Rules 33 and 34. A controlled activity status gives effect to NPSET Policy 2 which requires that decision makers must recognise and provide for the effective operation, maintenance, upgrading and development of the National Grid.	Reject the amendment sought
Rule 33 – Other structure erection or placement	61 – Te Rūnanga o Ngāti Ruanui Trust	Amend Rule 33 to include standards/terms/conditions to read: <i>(a) placement of structure and discharge does not adversely affect the matters/values identified for protection by mana whenua in the cultural impact assessment</i> <i>(b) placement of structure and discharge complies with tangata whenua indicators referred to in the tangata whenua monitoring plan</i> <i>(c) placement of structure and discharge is consistent with iwi management plan.</i> AND Include the following notification note: <i>Resource consent applications under this Rule will be notified to tangata whenua</i>	Oppose	The submission point has two components, both of which are opposed. The first component of the submission seeks insertion of standards/terms/conditions. This part of the submission is opposed as the proposed plan does not provide standards/terms/conditions for discretionary activities. The second component of the submission seeks automatic notification. The requirement for automatic notification is opposed as it fails to recognise the specific nature or effects of an activity. The RMA does not require or provide for mandatory notification for all activities. Rather, the requirement for notification is governed by s95A and s95B of the RMA and informed by the activity status and the effects of an activity.	Reject the amendment sought
Rule 34 – Other structure erection or placement	61 – Te Rūnanga o Ngāti Ruanui Trust	Amend Rule 34 to include standards/terms/conditions to read: <i>(a) placement of structure and discharge does not adversely affect the matters/values identified for protection by mana whenua in the cultural impact assessment</i> <i>(b) placement of structure and discharge complies with tangata whenua indicators referred to in the tangata whenua monitoring plan</i> <i>(c) placement of structure and discharge is consistent with iwi management plan</i> AND Include the following notification note: <i>Resource consent applications under this Rule will be notified to tangata whenua</i>	Oppose	The submission point has two components, both of which are opposed. The first component of the submission seeks insertion of standards/terms/conditions. This part of the submission is opposed as the plan does not provide standards/terms/conditions for non-complying activities. The second component of the submission seeks automatic notification. The requirement for automatic notification is opposed as it fails to recognise the specific nature or effects of an activity. The RMA does not require or provide for mandatory notification for all activities. Rather, the requirement for notification is governed by s95A and s95B of the RMA and informed by the activity status and the effects of an activity.	Reject the amendment sought
Rule 35 – Maintenance repair of existing lawfully	41 – Te Korowai o Ngāruahine Trust	Amend Rule 35 to require notification to iwi of any maintenance, repair or minor alteration work of lawfully established structures in the CMA.	Oppose	The submission point is opposed as the RMA does not require or provide for mandatory notification for all activities (and in particular notification is not provided for permitted activities). Rather, the requirement for notification is governed by s95A and s95B of the RMA and informed by the activity status and the effects of an activity. As	Reject the amendment sought

Plan Reference	Who made the original submission point?	Please state the original submission point and indicate clearly what part of the proposed Plan it relates to.	Oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
established structures				such, the requirement for compulsory notification does not fit within the framework for applying for, or obtaining, resource consent.	
Definition – Coastal environment	45 – Powerco	Amend Plan by mapping the coastal environment line for Taranaki and referencing this in an amended definition of “coastal environment” to read: <i>Coastal environment means the areas where coastal processes, influences or qualities are significant, including lakes, lagoons, tidal estuaries, saltmarshes, coastal wetlands, and the margins of these and includes all of the coastal marine areas, land inland to the point defined on the maps at Schedule X, the natural and physical resources within it, and the atmosphere above it.</i>	Support in part	The submission point is supported in part in terms of mapping. Mapping of the extent of the Coastal Environment would assist plan users in understanding the provisions in the plan, and assist in plan interpretation and application.	Accept the amendment sought in part in terms of mapping of the coastal environment
Definition – Network utility	45 – Powerco	Retain the definition of “network utility” as notified.	Support	The submission point is supported on the basis it reflects s166 of the RMA.	Accept the amendment sought
Definition – Reverse sensitivity	45 – Powerco	Amend the definition of “reverse sensitivity” to read: <i>Reverse sensitivity refers to the potential for the operation of an existing effects of sensitive activities on other lawfully established activities to be constrained or curtailed by the more recent establishment or intensification of other activities which are sensitive to the proposed activity in their vicinity.</i>	Support	The submission point is supported as it appropriately recognises that it is not only sensitive activities which are likely to be susceptible to reverse sensitivity effects. Specific to the National Grid, Policy 10 of the NPSET requires that not only reverse sensitivity effects on the National Grid be avoided, but also that the operation, maintenance, upgrading and development of the National Grid is not compromised. The amended definition of reverse sensitivity would give effect to the National Grid. The submission point is supported as it appropriately recognises that it is not only sensitive activities which are likely to be susceptible to reverse sensitivity effects. Specific to the National Grid, Policy 10 of the NPSET requires that not only reverse sensitivity effects on the National Grid be avoided, but also that the operation, maintenance, upgrading and development of the National Grid is not compromised. The amended definition of reverse sensitivity would give effect to the National Grid.	Accept the amendment sought
Schedules 1 and 2 – Coastal management areas and areas of outstanding value	45 – Powerco	Amend Schedules 1 and 2 by: - mapping the coastal environment line -ensuring that the extent of sensitive coastal management areas are appropriate having particular regard to existing infrastructure, including roads and overhead electricity lines - amending the corresponding descriptions of the coastal management areas throughout the Plan to recognise existing infrastructure in these sensitive areas to ensure it can be operated, maintained, and upgraded as appropriate.	Support in part	That part of the submission point seeking mapping of the Coastal Environment is supported. As recognised in the Powerco submission and in Transpower’s original submission, while activities within the Coastal Environment (but outside the CMA) are not subject to the rules of the proposed plan, the objectives and policies of the proposed plan will apply. Furthermore, Regional Plans and District Plans will need to ensure their plans give effect to the Regional Coastal Plan. On this basis Transpower supports the provision of mapping of the Coastal Environment so that certainty is	Accept the amendment sought in relation to mapping of the coastal line.

Plan Reference	Who made the original submission point?	Please state the original submission point and indicate clearly what part of the proposed Plan it relates to.	Oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
				provided for plan users (and in the development of regional and district plans) to readily determine if they are within the coastal environment and therefore whether the corresponding policy framework applies.	

FURTHER SUBMISSION IN SUPPORT OF OR IN OPPOSITION TO SUBMISSION ON NOTIFIED PROPOSED PLAN

Clause 8 of First Schedule, Resource Management Act 1991

TO: TARANAKI REGIONAL COUNCIL

SUBMITTER: TRANS-TASMAN RESOURCES LIMITED

1. This is a further submission by **Trans-Tasman Resources Limited** (TTR) on the proposed Taranaki Regional Coastal Plan (Proposed Plan).
2. TTR made a submission on the Proposed Plan dated 23 April 2018.
3. TTR is has an interest in the Proposed Plan greater than the general public has, as TTR:
 - (a) holds a Minerals Mining Permit under the Crown Minerals Act 1991 enabling exploration and mining within the Taranaki coastal waters and the adjacent exclusive economic zone; and
 - (b) holds marine consents and marine discharge consents for iron sand mining in the adjacent exclusive economic zone for which some monitoring activities will occur within the Taranaki coastal waters.
4. Attached to this submission as **Appendix 1** is a table which sets out:
 - (a) the submissions and particular submission points that TTR supports or opposes;
 - (b) the reasons that TTR supports or opposes the submissions and submission points; and
 - (c) whether TTR is seeking that the whole or part of the submission or a particular submission point be allowed or disallowed.
5. TTR wishes to be heard in support of its further submission.
6. If others make a similar submission, TTR will consider presenting a joint case with them at a hearing.

DATE: 2 August 2018



Mike Holm / Vicki Morrison-Shaw

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APPENDIX 1 – FURTHER SUBMISSIONS FROM TRANS-TASMAN RESOURCES LIMITED ON PROPOSED TARANAKI COASTAL PLAN

Provision	Submitter name	Relief sought by submitter	TTR position	TTR reasons	What TTR seeks
General – identification of significant indigenous species, including habitats and ecosystems (and Objective 8 and Policy 14)	Department of Conservation	Map areas, ecosystems, and habitats that have significant indigenous biodiversity values.	Support	Mapping the areas instead of providing a schedule of significant species and ecosystems would provide greater clarity to plan users of important areas.	Relief be allowed.
General – activity management	Greenpeace	– Activities should be managed so as to avoid, remedy or mitigate adverse effects to environmental bottom lines and policies of the NZCPS and/or values identified in the Regional Policy Statement and Regional Coastal Plan. Marine spatial management and associated rules framework is an appropriate method that should be applied	Oppose	It is unclear exactly what changes are sought to the activity rules and no information is given as to the way in which the current framework fails to comply with the RMA and relevant policy documents	Relief be declined
General – use and application of terms	Transpower	– Confirmation is sought that the rules in the PCPT only apply to the CMA.	Support	It is important that there is clarification as to the areas to which the plan provisions and rules apply.	Relief be allowed.

Provision	Submitter name	Relief sought by submitter	TTR position	TTR reasons	What TTR seeks
		<ul style="list-style-type: none"> - Clarification is sought as to what provisions in the PCPT the CE apply to. - Clarification is also sought as to the consistency in the use of the terms CMA and CE throughout the PCPT 			
Ch 2 – 2.5	Forest and Bird	<p>Amend section 2.5:</p> <ul style="list-style-type: none"> - to consider the legislation and Acts under Policy 5 of the NZCPS - recognise the relationship between the Plan and the EEZ and how the Plan addresses, or not, the effects that extend beyond the CMA or into the CMA. - explain the relationship between this plan and other Acts / legislation 	Oppose in part, neutral in part	<ul style="list-style-type: none"> - Section 2.5 is intended to set out other legislation applying in the coastal marine area – being the area out to the 12nm limit. - TTR considers it is appropriate to limit this section to just those matters and would suggest deleting reference to the Continental Shelf Act 1964 which does not apply in the CMA. - TTR is neutral to the request to explain the relationship between this plan and other Acts 	Relief be declined.
Ch 3 – 3.1	Forest and Bird	Amend the third para in Section 3.1 to recognise existing pressures on the coastal environment, including from beyond the CMA and that low current demand does not mean management of effects can	Oppose	<ul style="list-style-type: none"> - The purpose of the section is to outline the Taranaki coastal environment not adjoining environments (whether 	Relief be declined.

Provision	Submitter name	Relief sought by submitter	TTR position	TTR reasons	What TTR seeks
		be relaxed.		the EEZ or CMAs within other regions).	
Ch 4 – Objective 2	Forest and Bird	Amend as follows: Objective 2: Appropriate-Efficient use and development Natural and physical resources of the coastal environment are used efficiently, and activities that depend on the use and development of these resources are provided for in appropriate locations.	Oppose	<ul style="list-style-type: none"> – The relief sought is inappropriate and does not recognise that some activities need to be provided for in coastal locations. – If the concern is around functional need then the objective could be clarified to demonstrate that activities that depend on coastal resources and/or have a functional need to locate in that area are provided for. 	Relief be declined.
Ch 4 – Objective 5	Department of Conservation	Amend objective 5 to: Water quality in the coastal environment is maintained and enhanced and where quality of water in the coastal environment has deteriorated, restored where practicable.	Oppose	<ul style="list-style-type: none"> – The relief sought goes beyond what is necessary to give effect to Policy 21 of the NZCPS and does not include any of the important qualifiers in Policy 21 (such as the policy applying where the deterioration results 	Relief be declined.

Provision	Submitter name	Relief sought by submitter	TTR position	TTR reasons	What TTR seeks
				in significant adverse effects)	
Ch 4 – Objective 10	Te Korowai o Ngāruahine Trust	Amend: The principles of the Treaty of Waitangi, including the principles of kawanatanga, rangatiratanga, partnership, active participation, resource development and spiritual recognition, are given effect to taken into account in the management of the coastal environment.	Oppose	– The relief sought imposes a higher obligation than that set out in the RMA s 8	Relief be declined.
Ch 4 – Objective 10	To Kotahitanga o Te Atiawa Trust and Hapū of Te Atiawa Iwi	Give effect to the principles of the Treaty of Waitangi, including the principles of kawanatanga, rangatiratanga, partnership, active participation, resource development and spiritual recognition, are taken into account in the management of the coastal environment'.	Oppose	– As above	Relief be declined
Ch 5 – Polices (General)	Te Rūnanga o Ngāti Ruanui Trust	Although activities undertaken within the Exclusive Economic Zone (adjoining the CMA) is not captured by the Plan, our point of contention in this approach relates on the application of integrated management not only to the adjoining in-land boundary but also to adjoining Exclusive Economic Zone of the water limit of the CMA. This has	Neutral	– The plan has no jurisdiction to control activities within the EEZ – TTR has no issue with legal advice being taken on the issue but would oppose any changes which sought to control EEZ activities	To the extent the relief seeks to impose controls on EEZ activities that the relief be declined

Provision	Submitter name	Relief sought by submitter	TTR position	TTR reasons	What TTR seeks
		been raised by appellants in the High Court with respect to the Trans - Tasman Resources Limited's seabed mining application. We recommend that the TRC follows the directions of the High Court and/or seek legal advice on the defect of the RMA to ensure that the sustainable management purpose of the RMA is followed			
Ch 5 – Policy 1	Department of Conservation	Include a new characteristic of the open coast to policy 1(d): <u>(v) provide important habitats for marine species</u>	Oppose	– The relief sought is already largely provided for by 1(d)(ii)	Relief be declined.
Ch 5 – Policy 1	G Knuckey	28. Identify two new marine spatial management areas: 1. Wahi Tapu Areas, and 2. Wahi Taonga Areas.	Oppose	– There is insufficient information given as to the extent and characteristics of these areas.	Relief be declined
Ch 5 – Policy 3	Forest and Bird	Remove reference to adaptive management. Reword to give effect to Policy 3 of the NZCPS and by including reference to the effects of climate change.	Oppose	– There will never be perfect information and as new technologies and methods are developed, adaptive management can play an appropriate approach in determining the appropriateness of effects.	Relief be declined.

Provision	Submitter name	Relief sought by submitter	TTR position	TTR reasons	What TTR seeks
				– It is inappropriate to single out climate change in this policy.	
Ch 5 – Policy 5	NZ Petroleum and Minerals	Amend clause b) as follows: the benefits to be derived from the activity at a local, regional and national level, including the potential contribution of aquaculture and marine based renewable energy resources <u>and the existing and potential contribution of petroleum and mineral resources;</u>	Support	– It is appropriate that there is specific recognition of the economic and social benefits that petroleum and mineral resources provide to the region.	Relief be accepted.
Ch 5 – Policy 5	Port Taranaki	Amend clause (g) by adding after the word recreation: <u>unless the type of activity, and the need to maintain public safety, makes enhancement or restoration of public access inappropriate.</u>	Support	It is appropriate to restrict public access when certain activities are being undertaken or there are public safety issues	Relief be granted.
Ch 5 – Policy 5	Transpower	That Policy 5(a) be amended as follows: Determine whether Provide for use and development of the coastal environment is in an appropriate place and form and within appropriate limits by having regard to: (a) the functional need <u>or technical, operational and/or locational requirement</u> for the activity to be	Support in part and neutral in part	– The change to the introductory words to policy 5 are supported as it is more appropriate wording for a policy and simplifies the wording. – TTR is neutral to the remaining changes suggested.	Relief in relation to policy 5 (introductory words) be accepted

Provision	Submitter name	Relief sought by submitter	TTR position	TTR reasons	What TTR seeks
		<p>located in the coastal marine area; conversely, activities that do not have a functional need to be located in the coastal marine area should not be located there (unless the non-marine related activity complements the intended use and function of the area);</p> <p>That the term 'functional need' be defined, and if that definition does not include 'technical, operational and/or locational requirement', that separate reference to technical, operational and/or locational requirement be provided in the PCPT, as sought in Transpower's submission.</p> <p>A suggested definition of functional need is as follows:</p> <p><u>The locational, operational, practical or technical needs of an activity, including development and upgrades.</u></p> <p>And any consequential amendments that arise from the amendments proposed.</p>			
Ch 5 – Policy 8	Department of Conservation	Amend the introductory sentence to:	Support	The relief corrects a typographical error and	Relief be accepted

Provision	Submitter name	Relief sought by submitter	TTR position	TTR reasons	What TTR seeks
		Protect the visual quality and the physical, ecological and cultural integrity of coastal areas of outstanding value identified in Schedule 1 2 from inappropriate use and development by...		clarifies the intent of the policy is to protect outstanding value coastal areas not all coastal management areas	
Ch 5 - Policy 8	Federated Farmers	<p>Amend the policy as below:</p> <p>Protect the visual quality and the physical, ecological and cultural integrity of coastal areas of outstanding value identified in Schedule 1 from inappropriate use and development by:</p> <p>(a) avoiding adverse effects of activities on the values and characteristics identified in Schedule 2 that contribute to areas:</p> <p>(i) having outstanding natural character; and/or</p> <p>(ii) being outstanding natural features and landscape'</p> <p>Within or adjoining coastal management area – Outstanding Value; and</p> <p>(b) maintaining significant seascapes and visual corridors associated with outstanding natural features and landscapes;</p>	Support in part and neutral in part	<p>Deletion of adjoining is appropriate as protection should extend only to the extent of the outstanding area not to land beside it.</p> <p>TTR is neutral to the deletion of (b).</p>	Deletion of adjoining be allowed.

Provision	Submitter name	Relief sought by submitter	TTR position	TTR reasons	What TTR seeks
		<p>including views from within the landscapes or features, and views of the landscapes and features.</p>			
Ch 5 – Policy 9	PEPANZ	<p>We suggest replacing certain phrases with more direct language, as follows:</p> <ol style="list-style-type: none"> 1. is of an appropriate form, scale and design to be sympathetic <u>minimise effects on the character, visual amenity and quality of</u> to the existing landforms, features and vegetation (excluding high visibility markers required for safety or conservation purposes); 2. contributes to the <u>enhancement</u> or <u>restoration of</u> natural character; 3. is compatible with the existing level of modification to the environment, including by having particular regard to Policy 1; 4. is appropriate for the context of the area within the surrounding landscape, its representativeness and ability to accommodate change; 5. is of an appropriate form, scale and design to be sympathetic <u>minimise effects on the character, visual amenity and quality of</u> to the existing landforms, features and vegetation (excluding high visibility 	<p>Support in part</p> <p>Oppose in part</p>	<p>TTR supports the changes to 1, 4, and 5 as they provide greater clarity as to what is desired.</p> <p>TTR opposes the changes to 2 as requiring enhancement and restoration rather than contributing to it imposes a higher requirement and fails to recognise that enhancement efforts are not always 100% effective.</p>	<p>Relief be accepted for 1, 4 and 5</p> <p>Relief be declined for 2.</p>

Provision	Submitter name	Relief sought by submitter	TTR position	TTR reasons	What TTR seeks
		markers required for safety or conservation purposes).			
Ch 5 – Policy 14	G Knuckey	Add policy 14 <u>Maintain enhance and restore mauri of Wahi Tapu and Wahi Taonga areas.</u>	Oppose	No information is provided as to what these areas may encompass	Relief be declined
Ch 5 – Policy 14	Te Kotahitanga o Te Atiawa Trust and Hapū of Te Atiawa Iwi	Add clause: 14(a)(vii) <u>Taonga species as identified by tāngata whenua'</u>	Oppose	<ul style="list-style-type: none"> – No information is provided as to what these species may encompass – There is a need for certainty in the plan – If species are to be included they should be identified in the plan 	Relief be declined
Ch 5 – Policy 14	Te Rūnanga o Ngāti Ruanui	Add a new provision to (f): <u>taonga species protected under Taranaki iwi Deed of Settlement, as identified in Schedule 4C;</u>	Oppose	<ul style="list-style-type: none"> – The list of species includes a large number of fish and shellfish – The relief does not distinguish between those where numbers are abundant and those at risk – Requiring the avoidance of adverse effects (not just significant adverse effects) on such 	Decline the relief sought

Provision	Submitter name	Relief sought by submitter	TTR position	TTR reasons	What TTR seeks
				species may result in a large number of activities being unable to be undertaken	
Ch 5 – Policy 15	Te Rūnanga o Ngāti Ruanui	Introduction of cultural cautionary zone (or buffer zone) and cultural and heritage sites	Oppose	<ul style="list-style-type: none"> – The submission notes that most of the coastal area is of significance – which would make most of the area subject to such a zone – No information is given as to the proposed provisions to apply in the zone, the size of the buffer zone and the justification for that size or other restrictions – The zone would effectively establish a second consenting process for activities 	Relief be declined
Ch 5 – Policy 16	Te Kotahitanga o Te Atiawa Trust and Hapū of Te Atiawa Iwi	Add: 16(k) provide for review conditions on coastal permits where necessary to address unforeseen adverse effects on sites of significance to Māori as in Schedule 5 which may arise from the exercise of the consent.	Oppose	<ul style="list-style-type: none"> – The relief sought predetermines what is an appropriate method to address effects 	Relief be declined

Provision	Submitter name	Relief sought by submitter	TTR position	TTR reasons	What TTR seeks
Ch 5 – Policy 16	Te Rūnanga o Ngāti Ruanui	<p>Recognise and provide for the relationship of tāngata whenua culture, values and traditions with the coastal environment and take into account the principles of the Treaty of Waitangi, and kaitiakitanga. The Taranaki Regional Council will provide opportunities <u>ensure the active participation of</u> for tāngata whenua to actively participate in the resource management process where decisions are being made on issues of significance to tāngata whenua by:</p> <p>...</p> <p>(c) implementing the relevant legal requirements of Treaty settlements, including representation on Council committees; and <u>have regard to</u> taking into account other aspects of Treaty settlements including, statements of association, protection principles and statutory acknowledgements; ...</p> <p>(d) responding to requests for Mana Whakahono a Rohe to enhance the opportunities for collaboration with <u>iwā; provide for Mana Whakahono a Rohe, Transfer of Powers under</u></p>	Oppose	<ul style="list-style-type: none"> - The Council is not able to ensure active participation of another party as it cannot compel tāngata whenua to participate but can only provide opportunities for such participation - The relief sought in relation to (c) is at odds with s 8 of the RMA which only requires that Treaty principles and matters be taken into account - The relief sought in (i) the reasons for opposition are the same as that set out below in response to Te Korowai o Ngāruahine Trust 	Relief be declined

Provision	Submitter name	Relief sought by submitter	TTR position	TTR reasons	What TTR seeks
		<p><u>section 33 of the RMA, Memoranda of Understanding, co-management agreements, specific consultation processes including details of agreement as determined in consultation with tāngata whenua to enhance the opportunities for collaboration with iwi;</u></p> <p>...</p> <p>(i) requiring that resource consent applications, <u>notice of requirements</u> or plan change applications provide cultural impact assessments and/or archaeological assessments where <u>deemed</u> appropriate <u>by mana whenua or heritage authorities;</u></p> <p><u>(j) recognise the matters/values identified and proposed for protection by mana whenua in the cultural impact assessment;</u> and</p> <p>(k) ...</p>			
Ch 5 – Policy 17(i)	Te Korowai o Ngāruahine Trust	<p>Amend as follows:</p> <p>(i) requiring that resource consent applications or plan change applications provide cultural impact assessment and / archaeological assessments where <u>deemed</u> appropriate <u>and/or necessary by iwi.</u></p>	Oppose	<ul style="list-style-type: none"> – The decision making functions on resource consents and plan changes rest with councils under the RMA – Any delegation of decision making functions should occur 	Relief be declined

Provision	Submitter name	Relief sought by submitter	TTR position	TTR reasons	What TTR seeks
				<p>through the processes established under the RMA rather than through a plan provision</p> <ul style="list-style-type: none"> - The relief sought would likely lead to delays as it would require that iwi make a decision on every resource consent application or plan change within their respective rohe as to whether an assessment is required – so every minor height to boundary infringement, dwelling alteration infringement etc. - Any delays or refusal to provide a cultural impact assessment when one has been deemed necessary could frustrate the resource consent process 	
Ch 5 – 5.2 Activity Based	Heritage NZ	Insert clarification that:	Oppose	This is the opposite of the usual rules of interpretation	Relief be declined

Provision	Submitter name	Relief sought by submitter	TTR position	TTR reasons	What TTR seeks
Policies (22 – 49)		<u>Where a policy in this section conflicts with a general policy in 5.1, the general policy takes precedence</u>		that the specific overrides the general	
Ch 5 - Policy 28	K Pratt	Inclusion of a reference to ballast water	Oppose	Ballast water controls are already administered by MPI and there is no need for the coastal plan to duplicate these	Relief be declined
Ch 5 - Policy 30	K Pratt	<ul style="list-style-type: none"> – Consideration given to whether policy is adequate to address heavy fuel emissions from any potential iron sand mining. – Include reference to IMO sulphur content limits 	Oppose	<ul style="list-style-type: none"> – The policy is intended to address the effects of all air discharges not of a specific proposal. – It is inappropriate to require compliance with a standard or limit in a policy. 	Relief be declined
Ch 5 – Policy 32	Fonterra	Retain Policy 32 as notified, except for an amendment to subclause (a) as follows: Structures in the coastal marine area: (a) will generally be limited to those that have a functional need <u>or operational requirement</u> to be located in the coastal marine area and that do not cause duplication of a function for which existing structures or facilities are adequate;	Support	<ul style="list-style-type: none"> – The amendment appropriately recognises that some structures may have an operational need to be located in the CMA – TTR would also support this amendment being expanded to reference technical or locational requirements as suggested by Transpower in relation to Policy 5 above 	Relief be accepted and/or further amended to be consistent with Transpower amendment to Policy 5

Provision	Submitter name	Relief sought by submitter	TTR position	TTR reasons	What TTR seeks
Ch 5 – Policy 38	NZ Petroleum and Minerals	Amend the policy to include clause d) and e) as follows: <u>d) the removal of the structure poses unreasonable costs or is technical unfeasible</u> <u>e) the removal of the structure poses unreasonable risks on human health and safety</u>	Support with amendment	<ul style="list-style-type: none"> – TTR supports inclusion of costs and health and safety as such matters will be relevant to any removal decision. – TTR considers that the wording of the subparagraphs could be improved as follows: <u>d) the cost of removing the structure is unreasonable;</u> <u>e) removal of the structure is not technically feasible;</u> <u>or</u> <u>f) removal of the structure would result in unacceptable health and safety risks.</u> 	Relief be accepted with amendment
Ch 5 – Policy 42	Forest and Bird	Amend the policy to ensure activities avoid adverse effects as required by Policies 11, 13 and 15 of the NZCPS.	Neutral	<ul style="list-style-type: none"> – TTR is neutral to the relief sought provided it is not requiring avoidance of all adverse effects on all areas as the NZCPS policies and the RMA do not require this 	Relief be limited to what is required to comply with the NZCPS
Ch 5 – Policy 42	KASM and Greenpeace	In respect of policy 42, KASM opposes an interpretation of the	Oppose	<ul style="list-style-type: none"> – It is not clear what relief is being sought. 	Relief be declined

Provision	Submitter name	Relief sought by submitter	TTR position	TTR reasons	What TTR seeks
		disturbance referred to does not relate to commercial activity.		– If it is to oppose the policy applying to commercial uses then that is opposed as it is the effects of the activity rather than who is carrying them out and for what purpose that determines their acceptability	
Ch 5 – Policy 42	Te Kotahitanga o Te Atiawa Trust and Hapū of Te Atiawa Iwi	The Trust and Hapū would appreciate confirmation that the disturbance referred to in Policy 42, is that covered by policies 40,41, 43 and 44 and does not relate to commercial activity.	Oppose	As above	Relief be declined
Ch 5 – Policy 44	K Pratt	Amend as follows: Extraction of sand, shingle, shell and other natural material from the foreshore or seabed, or deposition of material on the foreshore or seabed, not provided for by Policies 39, 40, and 42 should: (a) be undertaken in an appropriate manner and location by having regard to the values and sensitivity of the environment potentially affected and the degree and significance of effects;	Oppose	The relief sought is: – ambiguous and uncertain as it is not clear what close proximity is, nor what would qualify as moderate to high relief reefs; – not necessary as (a) already requires consideration of the values and sensitivity of the environment which would include reefs	Relief be declined

Provision	Submitter name	Relief sought by submitter	TTR position	TTR reasons	What TTR seeks
		(b) generally not occur in coastal management areas – Outstanding Value, Estuaries Unmodified and Estuaries Modified; <u>(ba) generally not occur in close proximity to moderate to high relief offshore reefs;</u> <u>(bb) have regard to unique geological features that drive benthic primary production in the STB;</u> (c) have regard to the surface area...		and geological features; – it is inappropriate to single out reefs and geological features when there may be other features of value for other reasons.	
Ch 5 – Policy 44	Te Korowai o Ngāruahine Trust	TKONT requests an amendment to policy 44, and that further exclusions be applied in line with schedules 2, 4A and B, 5A and B and 6. We also request exclusions for areas subject to a crown application or settlement under the Takutai Moana Act 2011.	Oppose	– The policy already provides consideration of appropriate locations – Inclusion of applications for customary marine title or protected customary rights under Takutai Moana Act is not appropriate as the applications have not yet been determined	Relief be declined
Ch 5 – Policy 44	Te Kotahitanga o Te Atiawa Trust and Hapū of Te Atiawa Iwi	Amend to exclude areas and resources identified in Schedules 2, 4A and B, 5A and B and 6. Further, amend to exclude areas subject to a crown application or settlement under the Takutai Moana Act 2011.	Oppose	– As above	Relief be declined

Provision	Submitter name	Relief sought by submitter	TTR position	TTR reasons	What TTR seeks
Ch 5 – Policy 49	Forest and Bird	<p>Provide a policy which sets out that Noise and Vibration will avoid adverse effects on marine mammals and species to be protected under Policy 8, 9 and 14 of the Plan. Amend Policy 49 as follows (or similar):</p> <p>Noise and vibration from activities undertaken in the coastal marine area, including underwater activities, will:</p> <p>(a) <u>avoid adverse effects on marine mammals and fish species consistent with policies 8, 9 and 14</u> [list policies that give effect to Policies 11, 13 and 15 of the NZCPS]; <u>and</u></p> <p>(b) <u>be managed to avoid, remedy or mitigate other</u> minimise adverse environmental effects.</p>	Oppose	<ul style="list-style-type: none"> – The relief inappropriately broadens the policy – The broader relief may restrict the ability to give effect to permits granted under the Crown Minerals Act 	Relief be declined
Ch 5 – Policy 49	K Pratt	<p>Include reference to no adverse effects at a population level on blue whales, mammals in the threat classification list or IUC red list.</p>	Oppose	<ul style="list-style-type: none"> – The policy is already sufficiently broad to cover effects on mammals; – It is inappropriate to single out mammals when other animals or species may also be affected by noise; – It is also inappropriate for a policy to set a threshold. 	Relief be declined

Provision	Submitter name	Relief sought by submitter	TTR position	TTR reasons	What TTR seeks
Ch 6 – Method 6.1	Forest and Bird	1.g) should include the Marine Mammal Protection Act 1978, Wildlife Act 1953 and Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012	Oppose in part	– This section is about council providing advice about other legislation – TTR considers that this is more appropriately directed at matters within the coastal marine area rather than outside of it (such as the EEZ)	Relief be declined
Ch 6 – Method 6.4	K Pratt	Maintain and update GIS databases of all known coastal sites <u>coastal marine areas</u> with regionally significant values that identify their values, including the presence of any threatened or regionally distinctive species and sites of high cultural, spiritual and historical significance.	Oppose	– The relief sought does not make sense – The intention appears to be to refer to such sites within the coastal area. If a change was to be made it would be clearer to refer to “... all known <u>natural heritage coastal sites within the coastal marine area</u> with regionally significant values...”	Relief be declined or amended for clarity as suggested in this submission
Ch 6 – Method [6.5]	Grant Knuckey	7. Add implementation Methods for all applications for resource consent policy; or plan changes; or variations are to be reported on by cultural adviser(s) mandated by tāngata	Oppose	– Relief goes beyond what can be required for a resource consent given that an applicant is not	Relief be declined.

Provision	Submitter name	Relief sought by submitter	TTR position	TTR reasons	What TTR seeks
		whenua of Taranaki with costs to be borne by proponents.		<p>required to consult under s 36A of the RMA</p> <ul style="list-style-type: none"> - The relief sought fails to recognise the role that independent cultural advisors can play in assisting iwi to put together cultural impact assessments and/or in undertaking such assessments where tāngata whenua have refused to provide - It is inappropriate for the plan to include direction on who pays for costs. 	
Ch 6 – Method 6.8 (48)	K Pratt	Consider adding reference to Maritime NZ Marine Protection Rules, Craft Risk Management Standard and conditions 43 and 44 of TTR's EEZ consent	Oppose	<p>In relation to:</p> <ul style="list-style-type: none"> - The rules and standards are already in place and administered by other agencies and there is no need for the coastal plan to duplicate them. - The TTR consent conditions, these were developed in response to a specific proposal 	Relief be declined

Provision	Submitter name	Relief sought by submitter	TTR position	TTR reasons	What TTR seeks
				consented in the EEZ – such conditions may not necessarily be appropriate or necessary in a regional plan context	
Ch 6 – Method 6.10	Forest and Bird	Delete the reference to New Zealand Standards. Replace with: <u>Considerations of the latest information of the effects of noise of marine species and habitats. The use of the most recent professionally supported noise modelling for the marine environment. Taking a precautionary approach where limited information is available</u>	Oppose	<ul style="list-style-type: none"> – The relief sought is ambiguous, uncertain and likely to lead to disputes regarding what is the most recent noise modelling. – The NZ Standards are developed and amended through a robust processes and are the most appropriate to use and reference for activities in the CMA 	Relief be declined
Ch 8 – Rules [New]	G Knuckey	Draft rules as appropriate to: a. Wahi Tapu b. Wahi Taonga Examples: <u>b) Removal, damage or destruction of any indigenous flora or fauna including taonga species, unless for the purpose of scientific or resource consent monitoring; or</u>	Oppose	<ul style="list-style-type: none"> – The areas proposed to be wahi tapu and wahi taonga are not defined – The rules proposed are unclear and ambiguous, would prohibit all activities other than monitoring. – It is not possible to have a prohibited activity 	Relief be declined.

Provision	Submitter name	Relief sought by submitter	TTR position	TTR reasons	What TTR seeks
		<p><u>c) Structures or Occupation (whether temporary or permanent) of the Conservation Management Area for the purpose of removal, damage or destruction of any indigenous flora or fauna including taonga species, unless for the purpose of scientific or resource consent monitoring.</u></p> <p><u>d) Sediment on or in the conservation management area which cause adverse effects to indigenous flora or fauna including taonga species, unless for the purpose of scientific or resource consent monitoring.</u></p> <p><u>e) Consideration of activities outside of the CMA that influence or impact the Wahi taonga area.</u></p> <p>Prohibited status expires on completion of programme of monitoring that establishes to biological diversity vitality, health and wellbeing of ecosystem sufficient to sustain taonga species; then reverts to Discretionary status within thresholds established to ensure activities meet “restoration of mauri” performance standards put in place by tāngata whenua based on results of monitoring.</p>		<p>change to a discretionary activity without a further plan change process.</p>	

Provision	Submitter name	Relief sought by submitter	TTR position	TTR reasons	What TTR seeks
Ch 8 – Sections 8.1, 8.2, 8.3, 8.4, and 8.5	Te Kāhui o Taranaki Iwi Trust	<p>We submit that at the following sections of the Coastal Plan the words "<u>The [activity eg. discharge/structure] does not adversely impact on Māori cultural values.</u>" are added,</p> <ul style="list-style-type: none"> – 8.1, Discharges, Standard Terms/Conditions insert new paragraph as above – 8.2 Structures and Occupation, Standard Terms/Conditions insert new paragraph as above – 8.3 Disturbance, deposition and extraction, Standards Terms/Conditions insert new paragraph as above – 8.4 Reclamation or Drainage, Standard Terms/Conditions insert new paragraph as above – 8.5 Taking or Use, Standard Terms/Conditions insert new paragraph as above 	Oppose	<ul style="list-style-type: none"> – It is not clear whether the relief is seeking the addition of the wording to every rule within each rule section – The term Maori cultural values is broad and undefined and would be difficult for plan users to determine whether there is compliance or not – If relief is to be granted, it may be more appropriate to seek amendments to specific rules where activities may cause concerns and include reference to Sites in Schedule 5B 	Relief be declined
Ch 8 – Rules 2 and 3	Te Rūnanga o Ngāti Ruanui	<p>Add the following standards:</p> <p><u>(a) discharge does not adversely affect the matters/values identified for protection by mana whenua in the cultural impact assessment;</u></p> <p><u>(b) discharge complies with tāngata whenua indicators referred to in the tāngata whenua monitoring plan</u></p>	Oppose	<ul style="list-style-type: none"> – Relief sought predetermines that a cultural impact assessment and tāngata whenua monitoring plan would be required in all cases – Any delays or refusals to provide cultural 	Relief be declined

Provision	Submitter name	Relief sought by submitter	TTR position	TTR reasons	What TTR seeks
		<u>(c) discharge is consistent with iwi management plan.</u>		<p>impact assessments and monitoring plans in all cases has the potential to frustrate the consenting process.</p> <ul style="list-style-type: none"> - It is inconsistent with the approach taken in the plan to have standards applying to discretionary and non-complying activities. All matters are required to be assessed and singling out cultural matters gives the impression that these matters are the only ones to be considered or which are of concern. They also appear to give mana whenua a right of veto if there are any adverse effects. - Requiring no adverse effects is not consistent with the RMA framework 	
Ch 8 - Rule 10	K Pratt	The existing wording would not cover an operation such as that recently	Oppose	- The relief sought is not clear.	Relief be declined

Provision	Submitter name	Relief sought by submitter	TTR position	TTR reasons	What TTR seeks
		granted consent for iron sand mining in the EEZ. The processing vessel is regarded as an installation for the most part – see the advice of Maritime NZ. Rule 10 needs to include wording so that this scenario would also be captured.		– The rule as proposed is already sufficiently broad to cover any proposed cleaning of a ship and its anchoring would not prevent this rule from applying to it	
Ch 8 – Rule 10	MPI	Activity Sampling, scraping and/or In water cleaning of biofouling from the part of a ship, moveable object or navigation aid that is normally below the water surface involving the and resulting in a discharge of a substance contaminant into water in the coastal marine area and any associated: (a) deposition on the foreshore or seabed.	Support	– Change makes the rule clearer	Relief be accepted
Ch 8 – Rule 10	Te Korowai o Ngāruahine Trust	It is the preference of TKONT for rule 10 to be amended to a prohibited activity, and that all sampling, scraping and cleaning take place in the port coastal area.	Oppose	– The relief sought is inappropriate and impracticable and may result in some vessels being unable to be cleaned. – The non-complying activity status appropriately provides council with the ability to assess any	Relief be declined.

Provision	Submitter name	Relief sought by submitter	TTR position	TTR reasons	What TTR seeks
				application on a case by case basis.	
Ch 8 – Rule 10	Te Rūnanga o Ngāti Ruanui Trust	Add the following standards: <u>(a) discharge does not adversely affect the matters/values identified for protection by mana whenua in the cultural impact assessment;</u> <u>(b) discharge complies with tāngata whenua indicators referred to in the tāngata whenua monitoring plan</u> <u>(c) discharge is consistent with iwi management plan.</u>	Oppose	– Reasons as per response to Ngāti Ruanui relief sought in relation to Rules 2 and 3 above.	Relief be declined
Ch 8 – Rule 12	Climate Justice Taranaki	All seismic surveying for petroleum be prohibited	Oppose	– It is unclear whether all seismic surveying is sought to be prohibited or just that relating to petroleum – It is also unclear whether similar bans are proposed for bathymetric testing – No evidence is provided that the effects are such as to warrant a complete ban	Relief be declined
Ch 8 – Rule 12	Emily Bailey	As above	Oppose	– No evidence is provided that the effects are such as to	Relief be declined

Provision	Submitter name	Relief sought by submitter	TTR position	TTR reasons	What TTR seeks
				warrant a complete ban	
Ch 8 – Rule 12	Forest and Bird	Change the activity status to Discretionary in Open coast and Port Change the activity classification to Non-complying in Outstanding Value, Estuaries Unmodified and Estuaries Modified.	Oppose	<ul style="list-style-type: none"> – Effects from seismic surveying and bathymetric testing are temporary and transitory – To require consents for each such activity in all coastal areas is out of all proportion to the effects – The standards imposed ensure that effects are acceptable 	Relief be declined
Ch 8 – Rule 12	K Holswich	The standards/terms/conditions of this rule make no mention of iwi involvement in areas that could be highly sensitive to iwi/Hapū. We wonder how an event such as a rahui could be considered when there is no iwi/Hapū involvement. We believe this activity should be a controlled activity with considerations from iwi/Hapū	Oppose	<ul style="list-style-type: none"> – As above for Forest and Bird 	
Ch 8 – Rule 12	Te Kotahitanga o Te Atiawa Trust and Hapū of Te Atiawa Iwi	Change: Permitted to <u>Discretionary</u> . Add condition ensuring no adverse effects on cultural values associated	Oppose	<ul style="list-style-type: none"> – The reasons for opposing the activity status change are the same as those set out above for Forest and Bird 	Relief be declined

Provision	Submitter name	Relief sought by submitter	TTR position	TTR reasons	What TTR seeks
		with sites identified		<ul style="list-style-type: none"> – It is not clear what the cultural values are with respect to the identified and whether these are limited to those set out in the schedules. 	
Ch 8 – Rule 12	Te Rūnanga o Ngāti Mutunga	<p>Change activity status to discretionary from permitted for all coastal management areas</p> <p>Delete reference to “or any subsequent applicable Code of Conduct”</p>	Oppose in part	<ul style="list-style-type: none"> – Reasons as above for Forest and Bird – TTR is neutral to the request to delete the reference to any subsequent Code of Conduct 	Relief be declined.
Ch 8 – Rule 12	Te Rūnanga o Ngāti Ruanui	<p>Change activity status to discretionary</p> <p>Add the following standards:</p> <p><u>(a) discharge does not adversely affect the matters/values identified for protection by mana whenua in the cultural impact assessment;</u></p> <p><u>(b) discharge complies with tāngata whenua indicators referred to in the tāngata whenua monitoring plan</u></p> <p><u>(c) discharge is consistent with iwi management plan.</u></p> <p>Add the following control:</p>	Oppose	<ul style="list-style-type: none"> – The reasons for opposing the activity status change are the same as those set out above for Forest and Bird – Reasons as per response to Ngāti Ruanui relief sought in relation to Rules 2 and 3 above. – Requiring notification predetermines the outcome of the notification assessment 	Relief be declined

Provision	Submitter name	Relief sought by submitter	TTR position	TTR reasons	What TTR seeks
		<u>Resource consent applications under this Rule will be notified to tāngata whenua.</u>			
Ch 8 – Rules 13 and 14	Climate Justice Taranaki	The catch all rules be deleted or if remain they must be publicly notified	Oppose	<ul style="list-style-type: none"> – It is not possible for the plan to anticipate all types and activities giving rise to a discharge. Accordingly, it is important that there are rules to control such discharges. – Providing for such activities as discretionary in less sensitive areas and non-complying in more sensitive areas appropriately recognises and provides for such activities 	Relief be declined
Ch 8 – Rules 13 and 14	Te Rūnanga o Ngāti Ruanui	Add the following standards: <u>(a) discharge does not adversely affect the matters/values identified for protection by mana whenua in the cultural impact assessment;</u> <u>(b) discharge complies with tāngata whenua indicators referred to in the tāngata whenua monitoring plan</u>	Oppose	<ul style="list-style-type: none"> – Reasons as per response to Ngāti Ruanui relief sought in relation to Rules 2 and 3 above. – Requiring notification predetermines the outcome of the notification assessment 	Relief be declined

Provision	Submitter name	Relief sought by submitter	TTR position	TTR reasons	What TTR seeks
		<p><u>(c) discharge is consistent with iwi management plan.</u></p> <p>Add the following control:</p> <p><u>Resource consent applications under this Rule will be notified to tāngata whenua.</u></p>			
Ch 8 – Rule 20	K Holswich	We believe the protection of our reef systems needs to be specifically mentioned, that this activity should be discretionary or at the very least controlled, but with iwi/Hapū consultation in all cases.	Oppose	<ul style="list-style-type: none"> – The effects of such activities are less than minor so a permitted activity status is appropriate – Requiring consent for monitoring and sampling equipment is likely to create an unnecessary administrative burden for the Council – If there is a desire to be kept informed of structure placement this could perhaps be accommodated by council on their website through their permitted activity notification portal 	Relief be declined

Provision	Submitter name	Relief sought by submitter	TTR position	TTR reasons	What TTR seeks
Ch 8 – Rule 20	Te Rūnanga o Ngāti Mutunga	Change the activity status to discretionary	Oppose	<ul style="list-style-type: none"> – The effects of such activities are less than minor so a permitted activity status is appropriate – Requiring consent for monitoring and sampling equipment is likely to create an unnecessary administrative burden for the Council – If there is concern around the notification period for the council it would be more appropriate to extent the notification period than to change the activity status 	Relief be declined
Ch 8 – Rule 20 (b) – (f)	Te Rūnanga o Ngāti Ruanui	<p>Add and amend conditions (b) – (f) as follows:</p> <p>(b) <u>the</u> placement of the mooring structure <u>and</u> discharge does not have an adverse effect on the values associated with <u>cultural and historic heritage</u> identified in Schedule 5 [<u>Cultural and Historic Heritage</u>]</p>	Oppose in part	<ul style="list-style-type: none"> – TTR is neutral to the relief sought for (b) – TTR opposes (c) as this Schedule 1 includes all coastal management areas not just those with outstanding values – TTR opposes (d) as it would prohibit monitoring in sites of 	

Provision	Submitter name	Relief sought by submitter	TTR position	TTR reasons	What TTR seeks
		<p><u>(c) the placement of the mooring structure and discharge does not have adverse effect Schedules 1 and 2</u></p> <p><u>(d) the activity does not occur at any site identified in 5B [Sites of Significance to Maori and associated values] and Appendix 2;</u></p> <p><u>(e) the placement of the structure and discharge does not adversely affect the suitability of the receiving water for customary use and bathing after reasonable mixing;</u></p> <p>(e)<u>(f) placement of the structure and discharge does not have an adverse effect on any threatened or at risk or regionally distinctive species, or any rare or uncommon ecosystem type including those identified in Schedule 4A [Significant species and ecosystems]; taonga species protected under Taranaki iwi Deed of Settlement including those identified in Schedule 4C [Taonga species and habitat]; and</u></p> <p>...</p>		<p>significance which is often important in determining that the effects of activities are acceptable</p> <ul style="list-style-type: none"> - TTR opposes (e) again as it would prohibit monitoring of effects on uses and also because it is not clear what customary uses are being referred to - TTR opposes (f) for the reasons given earlier about the inclusion of Schedule 4C 	
Ch 8 – Rule 21	Department of Conservation	The erection of maritime navigation aids should not be a permitted activity for any member of the public A condition should be inserted before condition (a) as follows:	Oppose	- The installation of navigation aids may be a condition of consent for certain activities. The relief as	Relief be declined or amended if retained.

Provision	Submitter name	Relief sought by submitter	TTR position	TTR reasons	What TTR seeks
		<p><u>The activity is undertaken by:</u> <u>(i) Taranaki Regional Council or its agents; or</u> <u>(ii) Port Taranaki; or</u> <u>(iii) Maritime New Zealand or its agents.</u></p>		<p>currently worded would frustrate the ability to comply with a consent. If this wording is to be adopted, it should be amended to add: <u>(iv) a consent holder pursuant to a condition of a coastal consent.</u></p>	
Ch 6 – Rule 21	Forest and Bird	Delete the Activity provisions for associate disturbance, deposition and discharge.	Oppose	<ul style="list-style-type: none"> – The placement of mooring structures for monitoring will necessarily involve some minor disturbance. It is necessary for clarity for this to be provided for as part of the rule 	Relief be declined
Ch 8 – Rule 21	K Holswich	We believe the protection of our reef systems needs to be specifically mentioned, that this activity should be discretionary or at the very least controlled, but with iwi/Hapū consultation in all cases.	Oppose in part	<ul style="list-style-type: none"> – The standards already require that the placement not adversely affect important areas – although the reference to Schedule 5 should be amended to clarify whether it extends to both 5A and 5B – Requiring consent for all placements would 	Relief be declined

Provision	Submitter name	Relief sought by submitter	TTR position	TTR reasons	What TTR seeks
				<p>create an unnecessary administrative burden and may delay or frustrate compliance with existing consents where monitoring is required</p> <ul style="list-style-type: none"> – It would also have the potential to frustrate health and safety measures to ensure safety of life at sea. 	
Ch 8 – Rules 26, 27 and 28	NZ Petroleum and Minerals	Retain as notified or amend Rule 27 to restricted discretionary	Support	<ul style="list-style-type: none"> – TTR considers it is appropriate there is provision for exploration activities and that there is a cascade of activity status in the rules to reflect the controls and areas in which they are to occur. 	Relief be accepted.
Ch 8 – Rules 33 and 34	Te Rūnanga o Ngāti Ruanui	<p>Add the following standards:</p> <p><u>(a) placement of structure and discharge does not adversely affect the matters/values identified for protection by mana whenua in the cultural impact assessment;</u></p> <p><u>(b) placement of structure and discharge complies with tāngata</u></p>	Oppose	<ul style="list-style-type: none"> – Reasons as per response to Ngāti Ruanui relief sought in relation to Rules 2 and 3 above. – Requiring notification predetermines the outcome of the notification assessment 	Relief be declined

Provision	Submitter name	Relief sought by submitter	TTR position	TTR reasons	What TTR seeks
		<p><u>whenua indicators referred to in the tāngata whenua monitoring plan (c) placement of structure and discharge is consistent with iwi management plan.</u></p> <p>Add the following control:</p> <p><u>Resource consent applications under this Rule will be notified to tāngata whenua.</u></p>			
Ch 8 – Rules 42 and 43	Te Rūnanga o Ngāti Ruanui	<p>Add the following standards:</p> <p><u>(a) repair, alteration, extension or removal of structure and discharge does not adversely affect the matters/values identified for protection by mana whenua in the cultural impact assessment;</u></p> <p><u>(b) repair, alteration, extension or removal of structure and discharge comply with tāngata whenua indicators referred to in the tāngata whenua monitoring plan</u></p> <p><u>(c) repair, alteration, extension or removal of structure and discharge is consistent with iwi management plan.</u></p> <p>Add the following control:</p>	Oppose	For the reasons given above in response to rules 33 and 34.	Relief be declined

Provision	Submitter name	Relief sought by submitter	TTR position	TTR reasons	What TTR seeks
		<u>Resource consent applications under this Rule will be notified to tāngata whenua.</u>			
Ch 8 – Rule 52	Te Korowai o Ngāruahine Trust	TKONT requests notification of activities that fall within rule 52, benthic grab samples.	Oppose	<ul style="list-style-type: none"> – The permitted activity rule already requires advance notification to council. – If there is a desire to know when and where permitted activity sampling is being undertaken, it is suggested it would be more appropriate for council to make the information available on its website 	Relief be declined.
Ch 8 – Rule 52	Te Kotahitanga o Te Ātiawa Trust and Hapū of Te Ātiawa Iwi	Iwi are notified	Oppose	<ul style="list-style-type: none"> – As above for Te Korowai o Ngāruahine Trust 	Relief be declined
Ch 8 – Rule 52	Te Rūnanga o Ngāti Ruanui	Amend (f), add new (g) and (h) and amend (g) as follows: (f) sampling does not have an adverse effect on the values associated with <u>cultural and</u> historic heritage identified in Schedule 5 [<u>Cultural and</u> Historic Heritage]; <u>(g) the sampling does not have adverse effect on Schedules 1 and 2;</u>	Oppose	<ul style="list-style-type: none"> – It is not clear what the values are as opposed to areas in which historic heritage and cultural sites occur; – The areas in Schedule 1 encompass the whole CMA in different coastal management 	Relief be declined

Provision	Submitter name	Relief sought by submitter	TTR position	TTR reasons	What TTR seeks
		<p><u>(h) the activity does not have any adverse effect on any site identified in 5B [Sites of significance to Maori and associated values] and Appendix 2;</u></p> <p>(g)<u>(i) sampling does not have an adverse effect on any threatened or at risk, or regionally distinctive species, or any rare or uncommon ecosystem type, or any sensitive marine benthic habitat including those identified in Schedule 4 (Significant indigenous biodiversity) or any reef system; and taonga species protected under Taranaki iwi Deed of Settlement including those identified in Schedule 4C [Taonga species and habitat]</u></p>		<p>areas not just outstanding value sites;</p> <ul style="list-style-type: none"> - The taonga species encompass a large range of fish and shellfish and prohibiting any adverse effect on these species without any qualifiers (e.g. effects at a population level) would effectively stop all activities from occurring where such fish/shellfish were present 	
Ch 8 – Rule 53	Te Rūnanga o Ngāti Ruanui	<p>Amend (a), add new (b) and (c) and amend (d) as follows:</p> <p>(f) the activity does not have an adverse effect on the values associated with <u>cultural and</u> historic heritage identified in Schedule 5 [<u>Cultural and</u> Historic Heritage];</p> <p><u>(b) the activity does not have adverse effect on Schedules 1 and 2;</u></p> <p><u>(c) the activity does not have any adverse effect on any site identified in 5B [Sites of significance to Maori and associated values] and Appendix 2;</u></p> <p>(b)<u>(d) the activity does not have an adverse effect on any threatened or</u></p>	Oppose	Reasons as above for rule 52.	Relief be declined

Provision	Submitter name	Relief sought by submitter	TTR position	TTR reasons	What TTR seeks
		at risk, or regionally distinctive species, or any rare or uncommon ecosystem type, or any sensitive marine benthic habitat including those identified in Schedule 4 {Significant indigenous biodiversity] or any reef system; and taonga species protected under Taranaki iwi Deed of Settlement including those identified in Schedule 4C [Taonga species and habitat]			
Ch 8 – Rules 60 and 61	Climate Justice Taranaki	That seabed mining be prohibited in all areas	Oppose	<ul style="list-style-type: none"> – There is no evidence that the effects of seabed mining are such that it needs to be prohibited under the plan. – Prohibiting the activities would frustrate the issue of permits under the Crown Minerals Act – Rules 60 and 61 appropriately provide for the management of effects of other discharges – Providing for such activities as discretionary activities in less sensitive areas and non-complying 	Relief be declined

Provision	Submitter name	Relief sought by submitter	TTR position	TTR reasons	What TTR seeks
				activities in more sensitive areas appropriately recognises and provides for such activities	
Ch 8 – Rule 60	Te Kotahitanga o Te Atiawa Trust and Hapū of Te Atiawa Iwi	Discretionary to <u>non-complying</u> for the following CMA: - Estuaries Modified; and - Open Coast	Oppose	– Non complying status already applies to the more sensitive areas (outstanding value and estuaries unmodified under rule 61) and it is more appropriate for activities within the non-sensitive areas to be considered as a discretionary activity	Relief be declined
Ch 8 – Rule 60	Te Rūnanga o Ngāti Mutunga	Ask that this be changed to a non-complying activity for the Open Coast and Estuaries Modified Coastal Management Areas specifically for the: <u>Removal of more than 0.5m x3 of sand, shingle, shell or other natural material by any person or company in a 12 month period</u>	Oppose	– There is no evidential basis to support imposing this limitation – Non complying status already applies to the more sensitive areas (outstanding value and estuaries unmodified under rule 61) – The limitation conflicts with the permitted activity status given to	Relief be declined

Provision	Submitter name	Relief sought by submitter	TTR position	TTR reasons	What TTR seeks
				the collection of benthic grab samples under rule 53	
Ch 8 – Rules 60 and 61	Te Rūnanga o Ngāti Ruanui	<p>Add the following standards:</p> <p><u>(a) the activity does not adversely affect the matters/values identified for protection by mana whenua in the cultural impact assessment;</u></p> <p><u>(b) the activity complies with tāngata whenua indicators referred to in the tāngata whenua monitoring plan</u></p> <p><u>(c) the activity is consistent with iwi management plan.</u></p> <p>Add the following control:</p> <p><u>Resource consent applications under this Rule will be notified to tāngata whenua.</u></p>	Oppose	– For the reasons given above in response to rules 33 and 34.	Relief be declined
Ch 8 – Rule 65	NZ Defence Force	Amend rule to insert a limit on quantity and/or rate of water take, or otherwise amend to ensure consistency with Policy 47	Oppose	<ul style="list-style-type: none"> – There is no need to impose a limit on quantity or rate of take – Not imposing such limits is consistent with other regional plans – e.g. the proposed Northland Regional Plan 	Relief be declined.
Ch 8 – Rule 65	Te Kaahui o Rauru	We would want to be notified of this kind of activity, especially when it	Oppose	– Water takes are permitted under s 14 of	Relief be declined

Provision	Submitter name	Relief sought by submitter	TTR position	TTR reasons	What TTR seeks
		comes to the scale and timing of the activity.		the RMA so imposing a requirement for notification is at odds with this section	
Ch 8 – Rule 65	Te Kotahitanga o Te Atiawa Trust and Hapū of Te Atiawa Iwi	Remove the CMA - Outstanding Value. Add a condition with a water take limit.	Oppose	<ul style="list-style-type: none"> – The relief sought conflicts with s 14 which enables taking of coastal water – There is no evidence to suggest that the taking of water from outstanding value areas would have any adverse effects on those areas 	
Ch 8 – Rule 65	Te Rūnanga o Ngāti Mutunga	Ask that Outstanding Value coastal management area be removed from this rule Ask that the following conditions be added: <u>(a) the activity does not have an adverse effect on the values associated with historic heritage identified in Schedule 5 (Historic Heritage)</u> <u>(b) the activity does not have an adverse effect on any threatened or at risk, or regionally distinctive species, or any rare and uncommon</u>	Oppose	<ul style="list-style-type: none"> – As above for Te Kotahitanga o Te Atiawa Trust and Hapū of Te Atiawa Iwi – The conditions are largely already incorporated in the plan 	Relief be declined

Provision	Submitter name	Relief sought by submitter	TTR position	TTR reasons	What TTR seeks
		<u>ecosystem type including those identified in Schedule 4A</u> <u>(c) Taking or use of water is not at a quantity or rate that would cause adverse environmental effects</u>			
Ch 8 – Rule 65	Te Rūnanga o Ngāti Ruanui	Amend (b), add new (c) and (d) and (e) and amend (c) as follows: (b) the activity does not have an adverse effect on the values associated with <u>cultural and</u> historic heritage identified in Schedule 5 [<u>Cultural and</u> Historic Heritage]; <u>(b) the activity does not have adverse effect on Schedules 1 and 2;</u> <u>(c) the activity does not have any adverse effect on any site identified in 5B [Sites of significance to Maori and associated values] and Appendix 2;</u> <u>(d) the activity does not adversely affect the suitability of the receiving environment for customary use;</u> (c) <u>(e)</u> the activity does not have an adverse effect on any threatened or at risk, or regionally distinctive species, or any rare or uncommon ecosystem type, or any sensitive marine benthic habitat including those identified in Schedule 4 [Significant indigenous biodiversity] or any reef system; and <u>taonga species protected under Taranaki iwi Deed of Settlement</u>	Oppose	– Reasons as above for rule 52.	Relief be declined

Provision	Submitter name	Relief sought by submitter	TTR position	TTR reasons	What TTR seeks
		<u>including those identified in Schedule 4C [Taonga species and habitat]</u>			
Ch 8 – General Standards 8.6.3 Noise	Forest and Bird	<p>Include a specific standard setting out guidance on how appropriate noise standards are to be determined for activities which generate noise in the marine environment. Include the following or similar:</p> <p><u>Considerations of the latest information of the effects of noise of marine species and habitats. The use of the most recent professionally supported noise modelling for the marine environment. Taking a precautionary approach where limited information is available.</u></p>	Oppose	<ul style="list-style-type: none"> – The relief sought is ambiguous, uncertain and likely to lead to disputes regarding what is the most recent noise modelling. – The NZ Standards are developed and amended through a robust processes and are the most appropriate to use and reference for activities in the CMA 	Relief be declined
Ch 8 – General Standards 8.6.3	K Pratt	<p>The limits written in this section would not be able to be complied with should an operation the size of that which has recently been permitted in the EEZ, occur in the territorial waters. TTRL has under condition 11, page 283 of the decision document – noise limits that 'shall not exceed 130dB at 500m'. Under condition 12 'the crawler and IMN to achieve a total combined noise under full production of not more that 171dB at 1 metre. The joint experts recognising that levels used by NOAA are 120dB.</p>	Oppose	<ul style="list-style-type: none"> – The relief sought is ambiguous and unclear. – Noise levels attaching to a specific activity or proposal are more appropriately imposed through a resource consent proposal. 	Relief be declined

Provision	Submitter name	Relief sought by submitter	TTR position	TTR reasons	What TTR seeks
Ch 9 – General 9.1.8	Forest and Bird	Delete this provision	Oppose	– It is appropriate to provide for environmental compensation as s 104(ab) of the RMA specifically provides for this	Relief be declined
Ch 10 – Definitions – At risk	Forest and Bird	Include a definition for data deficient species which are likely to be at risk or threatened however populations are so low that information is not available to determine status under the NZ Threat Classification.	Oppose	– It is unnecessary to include this definition unless the relief sought by Forest and Bird to add such species to Schedule 4A is accepted	Relief be declined
Ch 10 – Definitions and acronyms – Biofouling	MPI	Biofouling means the aquatic organisms such as micro-organisms, plants and animals that have accumulated on surfaces and structures immersed in or exposed to the aquatic environment: – <u>“Microfouling” is a layer of microscopic organisms including bacteria and diatoms and the slimy substances they produce. Often referred to as a ‘slime layer’, microfouling can usually be removed by gently passing a finger over the surface.</u> – <u>“Macrofouling” is any organism included in the definition of “microfouling”.</u>	Neutral	– TTR is neutral to the change on the basis that it clarifies the meaning and categories of biofouling and is more consistent with other regional plans.	Relief is accepted if it achieves clarity and consistency

Provision	Submitter name	Relief sought by submitter	TTR position	TTR reasons	What TTR seeks
Definitions – Functional Need and Operational Requirement	Fonterra	<p>Insert new definitions:</p> <p><u>Functional need means the need for a proposal or activity to traverse, locate or operate in a particular environment because it can only occur in that environment.</u></p> <p><u>Operational requirement means the requirement for a proposal or activity to traverse, locate or operate in a particular environment because of technical or operational characteristics or constraints.</u></p>	Support	<ul style="list-style-type: none"> – The definitions would clarify the use of the terms in the Plan 	Relief granted
Schedules and Maps	Climate Justice Taranaki	<ul style="list-style-type: none"> – Schedule 1 CMA and Schedule 2: We propose including Patea Shoals and Rolling Ground as CMA of Outstanding Value and onto Schedule 2... – We also ask Council to assess the value of the Graham Bank... – We seek clarifications about the delineation of boundaries of various areas of Outstanding values and their recognition by district councils. There appears to be some mismatch between those on the Coastal Plan (e.g. Map 39 Waitotara) and those in the Proposed South Taranaki District Plan 2016 (e.g. Rural Map 	Oppose in part and neutral in part	<ul style="list-style-type: none"> – There is insufficient evidential basis to support the inclusion of Patea shoals, rolling grounds and graham bank as outstanding value areas at this stage. – TTR is neutral in relation to the clarification of boundaries relief sought. 	Relief regarding schedule 2 inclusions be declined

Provision	Submitter name	Relief sought by submitter	TTR position	TTR reasons	What TTR seeks
		22). Regional and district councils need to align these and other relevant boundaries as well as policies and rules.			
Schedule 4A	Forest and Bird	Map the locations where the rare and uncommon ecosystems types identified in this schedule occur. Add to the schedule: 1. non-vascular plant species including coastal lichens. 2. data deficient marine species 3. missing regionally distinctive species including the common dolphin	Support in part, oppose in part	<ul style="list-style-type: none"> - Support mapping of locations of uncommon ecosystems as this provides greater certainty for plan users - Oppose adding data deficient marine species as there is an insufficient evidential basis to support such mapping - Oppose adding regionally distinctive species where they are not at risk or threatened 	Relief in relation to mapping Schedule 4A sites be accepted. Additions to Schedule 4A be declined.
Schedule 4C	Te Rūnanga o Ngāti Ruanui	Insert significant taonga species schedule	Oppose	<ul style="list-style-type: none"> - The schedule includes a large number of fish and shellfish and does not identify those that are abundant, at risk, or otherwise - The effect of the relief sought in the rules linking to this schedule would be to prohibit or 	Relief be declined

Provision	Submitter name	Relief sought by submitter	TTR position	TTR reasons	What TTR seeks
				severely restrict most coastal activities	
Schedule 5B	Te Rūnanga o Ngāti Ruanui	Insert new area for “Te Moananui a o Ngāti Ruanui” with information to follow	Oppose	– The map attached to the submission indicates that this covers a large area of the CMA within Ngāti Ruanui's rohe, the effect of the relief sought in the rules linking to this schedule would be to prohibit or severely restrict most coastal activities within the area	Relief be declined
Schedule 5B	Te Rūnanga o Ngāti Ruanui	Insert various new areas with information to follow	Oppose	– No information is provided as to the scope or extent or values associated with these areas	Relief be declined

Further Submissions Form – Proposed Coastal Plan for Taranaki

Use this form for multiple further submissions on the Proposed Coastal Plan for Taranaki.

Important:

- Further submissions can be made only by a person/organisation representing a relevant aspect of the public interest, or a person/organisation whose interest in the proposal is greater than that of the general public
- Further submissions can only be made in support or opposition of an existing submission and must not raise any new points.
- You are obliged to notify the original submitters to whom your further submissions relate. [Find their email address here](#)

Email your further submissions to coastal@trc.govt.nz with 'Proposed Coastal Plan further submission' in the subject field.

Submissions close at 4pm on Saturday 4 August 2018

Your details

Name: Andrew Feierabend Organisation (if applicable): **Meridian Energy Limited**

Address: PO Box 2146 CHRISTCHURCH 8140

Daytime phone number: **(03) 357 9731**

Email address: **Andrew.Feierabend@MeridianEnergy.co.nz**

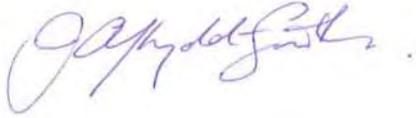
Select one status:

~~I am or represent a person/organisation representing a relevant aspect of the public interest~~ YES/NO

I am or represent a person/organisation whose interest in the proposal is greater than that of the general public YES/NO

Explain why you claim this status: **As a generator of electricity (including large scale renewable electricity generation), Meridian has an interest in the Proposed Plan greater than the general public**

Do you wish to be heard in support of your further submission? **YES/NO**

A handwritten signature in blue ink, appearing to read "J. P. ...".

Signature: For and on behalf of Meridian Energy Limited

Date: 2 August 2018

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
43 -Royal Forest and Bird Protection Society	Objective 3 – Reverse sensitivity	Oppose	Meridian Energy Limited (“Meridan”) opposes the request from the submitter to delete Objective 3, as Objective 3 is important in giving effect to Objective 6 of the New Zealand Coastal Policy Statement (NZCPS).	That Objective 3 be retained and amended as requested by Meridian in its submission and further submissions.
45 – Powerco	Objective 3 – Reverse sensitivity	Support in part	Meridian supports in part the request from the submitter to amend Objective 3, insofar as the objective should recognise the need to provide for the maintenance and upgrading of infrastructure, not just its operation.	That Objective 3 is amended to read as follows: <i>“The use and ongoing operation, <u>maintenance and upgrading</u> of nationally and regionally important infrastructure and other existing lawfully established activities is protected from new or inappropriate <u>subdivision</u>, use and development in the coastal environment.”</i>
46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	Objective 3 – Reverse sensitivity	Support in part	Meridian supports in part the request from the submitter to amend Objective 3, insofar as the objective should recognise the need to provide for the maintenance and upgrading of infrastructure, not just its operation.	That Objective 3 is amended to read as follows: <i>“The use and ongoing operation, <u>maintenance and upgrading</u> of nationally and regionally important infrastructure and other existing lawfully established activities is protected from new or inappropriate <u>subdivision</u>, use and development in the coastal environment.”</i>
23 – New Plymouth District Council	Objective 6 – Natural character	Support in part	Meridian supports the submission in part, insofar as Objective 6 is amended to better reflect the wording in NZCPS Policy 13(1).	That Objective 6 is retained but amended as requested by Meridian in its submission.
43 -Royal Forest and Bird Protection Society	Objective 6 – Natural character	Support in part	Meridian supports the submission in part, insofar as Objective 6 is retained the request from the submitter to amend Objective 6, as	
43 -Royal Forest and Bird Protection Society	Policy 3 – Precautionary approach	Oppose	Adaptive management is an approach that is consistent with Policy 3 of the NZCPS and which decision makers can appropriately apply where information on which to base decisions is uncertain or incomplete.	Retain Policy 3 as notified.

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
43 -Royal Forest and Bird Protection Society	Policy 4 – Extent and characteristics of the coastal environment	Support in part	The reference to “case by case” is uncertain and inappropriate for the reasons set out in the submission.	Amend Policy 4 to clarify that the coastal environment will be identified on the Planning Maps of the District Plans for the Taranaki Region.
43 -Royal Forest and Bird Protection Society	Policy 4 – Extent and characteristics of the coastal environment	Support in part	The matters set out under clauses (a) and (b) in Policy 4 are only some of the characteristics which are to be recognised under Policy 1(2) of the NZCPS for determining the inland extent of the coastal environment.	Amend Policy 4 to capture the extent and characteristics of the coastal environment in Policy 1(2) of the NZCPS.
45 – Powerco	Policy 4 – Extent and characteristics of the coastal environment	Oppose	Meridian considers that it is appropriate that each District Council within the Region identify and map the extent of the coastal environment within their District (e.g. the Proposed South Taranaki District Plan has mapped the Coastal Protection Area, which is the equivalent of the coastal environment).	That Policy 4 be retained and amended as requested by Meridian in its submission and further submissions.
43 -Royal Forest and Bird Protection Society	New Policy 9A – Criteria for identifying areas of outstanding or high natural character	Oppose	Meridian considers that there is no need to include a new policy to determine/identify areas of Outstanding Natural Character, a new policy to preserve areas of High Natural Character, or a new policy for other natural character in all areas of the coastal environment, as these matters are already appropriately addressed under Policy 8, Policy 9, and the definition of “Outstanding Value”, and there is no requirement in the NZCPS to identify areas of High Natural Character.	That the submitter’s submission is rejected.
43 -Royal Forest and Bird Protection Society	Policy 18 – Amenity Values	Oppose	Meridian considers that the request to amend to the policy to recognise amenity values associated with protecting indigenous vegetation is unnecessary, as it is already addressed under Policy 14.	That the submitter’s submission is rejected.
29 – Department of Conservation	Definition – Adaptive Management	Support	Meridian supports retaining the definition of Adaptive Management as notified.	That the submitter’s submission is accepted.

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
43 -Royal Forest and Bird Protection Society	Definition – Amenity Values	Oppose	Meridian opposes the request to amend the definition, as the definition (as notified) is consistent with the definition of amenity values in the Resource Management Act.	That the submitter's submission is rejected.
43 -Royal Forest and Bird Protection Society	Definition – Coastal Environment	Oppose	Meridian considers that it is appropriate that each District Council within the Region identify and map the extent of the coastal environment within their District (e.g. the Proposed South Taranaki District Plan has mapped the Coastal Protection Area, which is the equivalent of the coastal environment). As such, Meridian opposes the request to delete the definition of Coastal Environment.	That the submitter's submission is rejected.
45 – Powerco	Definition – Coastal Environment	Oppose	Meridian considers that it is appropriate that each District Council within the Region identify and map the extent of the coastal environment within their District (e.g. the Proposed South Taranaki District Plan has mapped the Coastal Protection Area, which is the equivalent of the coastal environment). As such, Meridian opposes the request to amend the definition of Coastal Environment.	That the submitter's submission is rejected.
46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	Definition – Coastal Environment	Oppose	Meridian considers that it is appropriate that each District Council within the Region identify and map the extent of the coastal environment within their District (e.g. the Proposed South Taranaki District Plan has mapped the Coastal Protection Area, which is the equivalent of the coastal environment). As such, Meridian opposes the request to amend the definition of Coastal Environment.	That the submitter's submission is rejected.
26 – Transpower NZ Ltd	New Definition – Functional Need	Support	Meridian supports inserting a new definition of Functional Need to enable the location of infrastructure associated with renewable electricity generation in the Taranaki Region.	That the submitter's submission is accepted.
29 – Department of Conservation	Definition – Natural Character	Support	Meridian supports amendment the definition of Natural Character so that it better reflects Policy 13 of the NZCPS.	That the submitter's submission is accepted.

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
29 – Department of Conservation	Definition – Natural Feature	Support	Meridian supports amendment the definition of Natural Feature so that it better reflects Policy 15(c) of the NZCPS.	That the submitter's submission is accepted.

**NOTICE OF FURTHER SUBMISSION BY THE OIL COMPANIES TO THE PROPOSED COASTAL PLAN FOR
TARANAKI PURSUANT TO CLAUSE 8 OF THE FIRST SCHEDULE OF THE RESOURCE MANAGEMENT
ACT 1991**

To: Taranaki Regional Council
47 Cloten Road
Private Bag 713
Stratford 4352
NEW ZEALAND

coastal@trc.govt.nz

Submitter:	Z Energy Limited ¹	BP Oil NZ Limited
	PO Box 2091 WELLINGTON 6140	PO Box 99 873 AUCKLAND 1149

Mobil Oil NZ Limited
PO Box 1709
AUCKLAND 1140

Hereafter, collectively referred to as the Oil Companies

Address for Service: BURTON PLANNING CONSULTANTS LIMITED
Level 1, 2-8 Northcroft Street
PO Box 33-817, Takapuna,
AUCKLAND 0740

Attention: Mark Laurenson

Phone: (09) 917-4302

Fax: (09) 917-4311

Email: m Laurenson@burtonconsultants.co.nz

File ref: 18/012

¹ On behalf of the wider Z Group including the Z and Caltex operations in New Zealand

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- 1 The Oil Companies' further submissions are as contained in the attached Table.
 - 2 The Oil Companies' interests in the proposed plan is greater than the interest of the general public.
 - 3 The Oil Companies wish to be heard in support of its further submissions.
 - 4 If others make similar submissions, the Oil Companies would be prepared to consider presenting a joint case with them at any hearing.

Dated at AUCKLAND this 3rd day of August 2018



Mark Laurensen

Authorised to sign on behalf of the Oil Companies

Submission	Relief Sought By Submitter (additions in underline, deletions in strike through)	Position of Further Submitter	Reason For Support / Opposition and Relief Sought by Further Submitter.
Trans-Tasman Resources Limited	<p>Policy 5: Appropriate use and development of the coastal environment</p> <p>(c) – Amend to recognise that an alternatives assessment, and the need for an activity to be the BPO, is not always required, in particular, where there are not significant adverse effects.</p> <p><i>the appropriateness of the proposed design, methodology, whether it is the best practicable option and the location or route of the activity in the context of the receiving environment and, where there are deemed to be significant adverse effects, any possible alternatives;</i></p> <p>(e) The words “pose a threat’ are uncertain and should be amended to refer to risk.</p> <p><i>the degree to which the activity will be threatened by, or contribute to, coastal hazard risk, or pose a threat to public health and safety <u>risks</u> with particular reference to Policy 20;</i></p> <p>(f) and (g) – Refer to maintenance as well as restoration and enhancement to be consistent with the higher order policy documents.</p>	Support	The relief proposed by the submitter improves the clarity of the policy and is consistent with the requirements of the RMA in relation to alternatives and the BPO.
Trans-Tasman Resources Limited	<p>Policy 8: Areas of outstanding value</p> <p>Amend the policy to specifically recognise that it may not be appropriate to avoid all adverse effects, and may indeed be appropriate to allow minor or transitory effects.</p> <p><i>Protect the visual quality and the physical, ecological and cultural integrity of coastal areas of outstanding value identified in Schedule 1 from inappropriate use and development by:</i></p>	Support	The principle of introducing wording to specifically recognise that it may be appropriate to allow minor or transitory effects is in keeping with case law and is supported.

	<i>(a) avoiding adverse effects of activities (other than minor or transitory effects) on the values and characteristics identified in Schedule 2 that contribute to areas: ...</i>		
Federated Farmers	<p>Policy 8: Areas of outstanding value</p> <p>Federated Farmers has concerns with the reference to protection of amenity values both within and near areas of outstanding value. The reference could capture a large and undefined area of land surrounding the scheduled features. By the inclusion of the term ‘or adjoining’ and by reference to maintaining views of the landscapes and features, this policy potentially manages areas beyond both the coastal marine area and the scheduled features. Case law has indicated that it may be acceptable to allow activities that have minor or transitory adverse effects in outstanding areas and still give effect to Policies 11, 13, and 15 of the NZCPS.</p> <p>Amend the policy as below: <i>Protect the visual quality and the physical, ecological and cultural integrity of coastal areas of outstanding value identified in Schedule 1 from inappropriate use and development by:</i> <i>(a) avoiding adverse effects of activities on the values and characteristics identified in Schedule 2 that contribute to areas:</i> <i>(i) having outstanding natural character; and/or</i> <i>(ii) being outstanding natural features and landscape’</i> <i>Within or adjoining coastal management area – Outstanding Value; and</i> <i>(b) maintaining significant seascapes and visual corridors associated with outstanding natural features and landscapes, including views from within the landscapes or features, and views of the landscapes and features.</i></p>	Support in part	<p>The changes sought provide improved clarity with regard to the effect of the policy on areas in proximity to scheduled areas of outstanding value. While it is recognised and accepted that the Coastal Plan has effect over both the CMA and the coastal environment, the extent to which the Policy applies should be clearly and appropriately identified, and activities adjacent to such areas should not be unnecessarily constrained or subject to more than one regulatory approach (eg: regional and district), unless those approaches clearly have different intent.</p> <p>This is particularly relevant to the Oil Companies’ Omata Terminal which is regionally significant infrastructure in close proximity to areas of Outstanding Value. For instance the terminal is clearly visible from Paritutu Rock. As drafted, clause (b) of Policy 8 could unreasonably restrict further development at the terminal.</p>
Trans-Tasman Resources Limited	Policy 20: Avoidance of increasing coastal hazard or public safety risks	Support in part	The Oil Companies support the intent of the submission insofar as a threat does not equate to a risk, and is an

	<p>The words “posing a threat” are uncertain and should be amended to refer to “risk”.</p> <p><i>Avoid increasing the risk of social, environmental and economic harm from hazards or posing a threat and avoid increased risks to public health and safety, or aircraft or navigation safety including by:...</i></p>		unnecessarily low threshold, however, in line with its own submissions, the Oil Companies also seek to ensure that the policy does not exclude any increase in risk.
Trans-Tasman Resources Limited	<p>Definition: Adaptive Management</p> <p>Amend the definition of “adaptive management” to recognise the concept of allowing an activity to commence on a small scale or for short period so its effects on the environment can be monitored, and the activity discontinued, amended or continued, as follows:</p> <p><i>means a structured, iterative process of robust decision making in the face of uncertainty, <u>which includes allowing an activity to commence on a small scale or for a short period so that its effects can be assessed and a decision made about the appropriateness of continuing the activity (with or without amendment) on the basis of those effects.</u> with an aim to reducing uncertainty over time via system monitoring. For the purposes of this Plan, the principles underpinning adaptive management include:</i></p> <p><i>(a) robust baseline monitoring <u>good robust information to establish the existing receiving environment;</u></i></p> <p><i>(b) resource consent conditions that require effective monitoring of adverse effects using appropriate indicators;</i></p> <p><i>(c) resource consent conditions that set thresholds requiring remedial action to be taken before significant adverse effects eventuate;</i></p> <p><i>(d) that any effects that may arise can be remedied before they become irreversible; and</i></p>	Support in part	The Oil Companies support the clarity proposed by the amendments, and note that they are consistent with the concept as defined in other NZ legislation.

	<i>(e) that the activity is able to cease all or part of its operation, or the scale of part or all of the operation, if the monitoring results warrant it.</i>		
Transpower	<p>3.1 Appropriate use and development</p> <p>Transpower supports the provision of an introductory explanation regarding the need to make provision for appropriate use and development within the Coastal Marine Area. However, an amendment is sought to recognise other constraints so as to make it clear within the proposed Coastal Plan that there are also technical, locational and/or operational reasons why an activity requires a coastal location which are not based solely on the use of the coast resource itself. Such recognition is consistent with Policy 1 of the NPSET which requires decision-makers to recognise and provide for the national, regional and local benefits of efficient electricity transmission, which may rely upon the location of National Grid assets within the coastal marine area, and Policy 3 of the NPSET which requires consideration of the constraints imposed by technical, operational and/or locational requirements when considering measures to avoid, remedy or mitigate adverse environmental effects of the National Grid. Put simply, the National Grid is linear infrastructure that has to connect generation sources with National Grid infrastructure (lines and grid exit points or substations). Therefore the National Grid has to get from A to B and may not be able to avoid coastal locations in doing so.</p> <p><i>Some activities rely upon a location in or near the coastal marine area, are dependent on the use of coastal resources, or have technical, operational or locational constraints that mean they require a coastal marine area location...</i></p>	Support in part	The intent of the submission is supported. It may be possible to more succinctly achieve the same intent by adopting a comprehensive definition of functional need, as sought by the Oil Companies.
Transpower	Objective 2: Appropriate use and development	Support in part	The intent of the submission is supported. It may be possible to more succinctly achieve the same intent by adopting a

	<p>Transpower largely supports Objective 2, as it has now been expanded since the Draft Plan to include ‘development’ that has to be located within the Coastal Environment, even if the activity does not specifically rely on the use of the natural and physical resources within it. However, an amendment is sought to the objective to reference technical, operational and/or locational requirements thereby making it clear that activities (such as the National Grid) which may have technical, operational and/or locational constraints and are required to be located in the coastal environment due to these requirements, are recognised. As notified, the objective infers only those activities utilising the coastal resource are provided for. The amended objective as sought would give proper effect to Policy 6 of the NZCPS, as well as Policies 2, 3 and 5 of the NPSET.</p> <p><i>Natural and physical resources of the coastal environment are used efficiently, and activities that depend on the use and development of these resources, <u>or have technical, operational and/or locational requirements</u>, are provided for in appropriate locations.</i></p>		comprehensive definition of functional need, as sought by the Oil Companies.
Transpower	<p>Definition: Functional need</p> <p>That the term ‘functional need’ be defined, and if that definition does not include ‘technical, operational and/or locational requirement’, that separate reference to technical, operational and/or locational requirement be provided in the proposed Coastal Plan, as sought in Transpower’s submission. A suggested definition of functional need is as follows: <u><i>The locational, operational, practical or technical needs of an activity, including development and upgrades.</i></u></p>	Support in part	<p>The intent of the submission is supported. A similar definition, explicitly referencing the coastal environment, was sought by the Oil Companies, as follows:</p> <p><u><i>Functional need means a requirement for a proposal or activity to traverse, locate or operate in the coastal environment.</i></u></p> <p>The Oil Companies accept that the ‘requirement’ could be further clarified with reference to “<u><i>locational, operational, practical or technical needs</i></u>”.</p>
Minister of Conservation	<p>Rule 35: Structure, maintenance, repair or minor alteration</p> <p>In order to minimise disturbance to the coastal environment and give effect to policy 11 of the NZCPS, conditions need to</p>	Oppose	<p>The proposed wording of standards addressing the matters raised has not been provided. In the absence of specific wording, the nature and effect of the standards is unclear and they are opposed. For instance, the submission seeks</p>

		<p>be included that address possible adverse effects arising from the use of machinery, vehicles, and the storage of materials associated with structure maintenance etc.</p> <p>Vehicles in the coastal environment can result in adverse effects (including crushing, compaction, tracking, vegetation destruction and surface alteration) on vulnerable areas such as mudflats, shellfish/crab beds, saltmarsh and estuarine vegetation. Minimising these impacts can be done by such methods as choosing the shortest and least sensitive route, using small & light machinery where necessary, minimising excavation and managing weed risks.</p> <p>Include conditions which address the following matters:</p> <ul style="list-style-type: none"> • How the use of vehicles and machinery in the coastal environment will be avoided where possible, and minimised/effects mitigated where necessary (including taking the shortest and least sensitive route). • The requirement for construction equipment including spoil, litter or equipment to be removed within 24 hours of completion of any works. • The prohibition of any refuelling or fuel storage occur within the coastal environment. • Methods should be employed to avoid any fuel spillage. 		<p>machinery takes the shortest and least sensitive route. There would seem to be potential that these two matters are contradictory, and it is not clear why there is a need to include a requirement beyond “least sensitive”.</p>
Minister of Conservation	of	<p>Rule 37: Network utility structure repair, alteration or extension</p> <p>There needs to be some control on the functional necessity for the structure to be extended beyond its original size.</p> <p>Amend the rule to include a provision about limiting the size of any extension.</p>	Oppose	<p>Matters of control such as the design and the size of any extension would reasonably be considered a design matter, which is already included as a matter of control. An amendment to this effect sought by the submitter is therefore considered unnecessary.</p>
Minister of Conservation	of	<p>Rule 38: Structure removal and replacement</p>	Oppose	<p>The proposed wording of standards addressing the matters raised has not been provided. In the absence of specific</p>

	<p>The removal and replacement of structures in the coastal environment is likely to involve the use of vehicles and machinery in the coastal environment. In order to minimise disturbance to the coastal environment and give effect to policy 11 of the NZCPS, conditions need to be included which address possible adverse effects arising from the use of machinery, vehicles, and the storage of materials when removing and placing structures. Vehicles in the coastal environment can result in adverse effects (including crushing, compaction, tracking, vegetation destruction and surface alteration) on vulnerable areas such as mudflats, shellfish/crab beds, saltmarsh and estuarine vegetation. Minimising these impacts can be done by such methods as choosing the shortest and least sensitive route, using small & light machinery where necessary, minimising excavation and managing weed risks.</p> <p>Include conditions which address the following matters:</p> <ul style="list-style-type: none"> • How the use of vehicles and machinery in the coastal environment will be avoided where possible, and minimised/effects mitigated where necessary (including taking the shortest and least sensitive route). • The requirement for construction equipment including spoil, litter or equipment to be removed within 24 hours of completion of any works. • The prohibition of any refuelling or fuel storage occur within the coastal environment. • Methods should be employed to avoid any fuel spillage. 		<p>wording, the nature and effect of the standards is unclear and they are opposed. For instance, the submission seeks machinery takes the shortest and least sensitive route. There would seem to be potential that these two matters are contradictory, and it is not clear why there is a need to include a requirement beyond “least sensitive”.</p>
Minister of Conservation	<p>Rule 44: Structure removal or demolition</p> <p>The removal or demolition of structures from the coastal environment is likely to involve the use of vehicles and machinery in the coastal environment. With the same</p>	Oppose	<p>The proposed wording of standards addressing the matters raised has not been provided. In the absence of specific wording, the nature and effect of the standards is unclear and they are opposed. For instance, the submission seeks machinery takes the shortest and least sensitive route. There</p>

	<p>reasoning as above (submission on rule 38 (and 35)), there needs to be greater controls around the use of machinery, vehicles, and the storage of materials when removing and demolishing structures.</p> <p>Include conditions which address the following matters:</p> <ul style="list-style-type: none"> • How the use of vehicles and machinery in the coastal environment will be avoided where possible, and minimised/effects mitigated where necessary (including taking the shortest and least sensitive route). • The requirement for construction equipment including spoil, litter or equipment to be removed within 24 hours of completion of any works. • The prohibition of any refuelling or fuel storage occur within the coastal environment. • Methods should be employed to avoid any fuel spillage. 		would seem to be potential that these two matters are contradictory, and it is not clear why there is a need to include a requirement beyond “least sensitive”.
First Gas Limited	<p>Rule 37: Network utility structure repair, alteration or extension</p> <p>Amend to make network utility pipeline repair, alteration or extension within Outstanding Value, Estuaries Unmodified, Estuaries Modified, Open Coast and Port a Permitted Activity</p> <p>Repair, alteration or extension is necessary for public safety and efficient operation and more than often need to be immediately done. It is considered that this can be appropriately managed by way of permitted activity standards, terms and conditions that reflect the values of the area of the works, rather than having to seek consent in every case.</p>	Support in part	<p>The intent of the submission is supported, although it is noted that Rule 35 already provides a permitted activity pathway for maintenance, repair or minor alteration, except at the Port.</p> <p>The Oil Companies reserve judgement on the specific provisions of the proposed permitted activity rule and how this will sit alongside the existing cascade, particularly Rule 35.</p>
Port Taranaki Limited	<p>Objective 2: Appropriate use and development</p>	Support in part	<p>The Oil Companies support the principle of amendments to objective 2, or a new objective, to better provide for provision of significant infrastructure and give effect to the RPS, but</p>

	<p>While PTL recognises that the objectives in Section 4 are high level, it is considered that this objective does not appropriately recognise the strategic importance of infrastructure such as Port Taranaki, and the need to be able to further develop the Port and other regionally significant infrastructure.</p> <p>Add a new objective or amend Objective 2 to specifically address provision for ongoing development of strategically significant regional and national infrastructure, including Port Taranaki at the objective level, to give effect to the Regional Policy Statement.</p>		<p>reserve judgement on the value of the inclusion of specific provisions depending on intent, outcome, wording and scope.</p>
Port Taranaki Limited	<p>Policy 5: Appropriate use and development of the coastal environment</p> <p>PTL supports this policy in part. In particular PTL supports the recognition given to activities that have a functional need to be located in the coastal environment. However, PTL is concerned that in respect to public access, the policy fails to recognise important security issues facing ports worldwide, and the public safety issues which might mean providing for public access is inappropriate.</p> <p>Amend clause (g) by adding after the word recreation: <u>unless the type of activity, and the need to maintain public safety, makes enhancement or restoration of public access inappropriate.</u></p>	Support	<p>The Oil Companies activities at the Port include the storage and use of petroleum products. These products are hazardous substances and unfettered access is not appropriate. This is appropriately recognised in the proposed amendment to clause (g) sought by the submitter.</p>
Port Taranaki Limited	<p>Rule 42: Other structure repair, alteration, extension or removal and replacement that is not provided for in Rules 35 to 41.</p> <p>The Port has considerable infrastructure investment in the Port Coastal Management Area and it is important that it has certainty in respect to repair, alteration, extension or removal and replacement of structures that it is responsible for. It is</p>	Support	<p>The Oil Companies support the principle of a standalone controlled activity rule for the provision of infrastructure at the Port not otherwise provided for, but reserve judgement on the specific wording of the rule.</p>

	<p>considered appropriate that the activity status of this rule for port activities should be controlled rather than full discretionary.</p> <p>1. Insert a new rule specifically for the Port Coastal Management area and in respect to port activities providing controlled activity status for other structure repair, alteration, extension or removal; and</p> <p>2. Make any consequential amendments to other rules and objectives and policies to give effect to this submission.</p> <p>Alternatively provide another rule structure or amendments/additional rules, to rules 35-41 that delivers the same result for the Port.</p>		
RNZ	<p>Policy 5: Appropriate use and development of the coastal environment</p> <p>RNZ supports the recognition of the 'functional need' for activities to be located in the 'coastal marine area', however RNZ submits that this should also refer to the functional need for activities to be located within the wider 'coastal environment', as the first part of the Policy clearly refers to 'use and development of the coastal environment'. RNZ suggests the following amendment:</p> <p><i>a) the functional need for the activity to be located in the coastal marine area <u>or the coastal environment</u>. Conversely, activities that do not have a functional need to be located in the coastal marine area <u>or the coastal environment</u> generally should not be located there...</i></p>	Support in part	The submission by the Oil Companies similarly seeks that functional need applies to both the CMA and Coastal Environment and seeks to ensure that the policy does not narrow the definition of functional need sought in its submission.
Petroleum Exploration and Production Association of New Zealand (PEPANZ)	<p>Regionally important infrastructure</p> <p>We recommend that storage is included in the definition to cover storage tanks, i.e. amend to supply, <u>storage</u>, or distribution</p>	Neutral	The Oil Companies consider that storage is essential to supply and distribution so do not consider the addition is strictly necessary but are not opposed to it if it provides clarification of the Oil Companies understanding.

Forest and Bird	<p>Coastal management area approach</p> <p>The application of management areas landward of the CMA is uncertain as 5.1 policies (i.e. Policy 1) apply to the coastal environment and CMA only.</p> <p>Amend Policy 1 to set out an area based management approach based on mapped and scheduled areas. Refer to relevant policies to identify characteristics in those areas which are not already for those areas in a schedule.</p>	Support	Clarification regarding the landward extent of the management areas is supported. The Oil Companies submissions were prepared on the basis that these areas apply as mapped, including beyond the CMA. As the Open Coast is not mapped beyond the indicative CMA boundary, it was understood that the Open Coast only applied in the CMA.
Forest and Bird	<p>Coastal management area approach</p> <p>Include a statement that Policy 1 does not provide direction for subdivision, use or development activities within the management areas.</p>	Oppose part	The Oil Companies are not necessarily opposed to the intent of the relief sought by the submitter but reserve judgement pending specific wording of the amendments.
Forest and Bird	<p>Port Policy</p> <p>Consider a specific policy for the port to give effect to the NZCPS</p>	Support part	The Oil Companies have significant assets at the Port that are regionally significant infrastructure and consider that a standalone port policy would be appropriate. The Oil Companies support the intent of the submission but reserve judgement pending specific wording of the policy sought.
Forest and Bird	<p>Natural character and natural features and landscapes</p> <p>Add a new policy to provide a basis for determining/identifying ONC to achieve Policy 13 of the NZCPS.</p>	Oppose part	The Oil Companies are not necessarily opposed to the intent of the relief sought by the submitter but reserve judgement pending specific wording of the amendments.
Forest and Bird	<p>Natural character and natural features and landscapes</p> <p>Add a schedule setting out the values and characteristics of identified areas of high natural character</p>	Oppose	These are already provided via map links in Schedule 1.
Forest and Bird	<p>Natural character and natural features and landscapes</p> <p>Add a new policy to preserve areas of High natural character</p>	Oppose part	The Oil Companies are not necessarily opposed to the intent of the relief sought by the submitter but reserve judgement pending specific wording of the amendments.
Forest and Bird	<p>Natural character and natural features and landscapes</p>	Oppose part	The Oil Companies are not necessarily opposed to the intent of the relief sought by the submitter but reserve judgement pending specific wording of the amendments.

	Add a new policy for other natural features and landscapes in all other areas of the coastal environment		
Forest and Bird	<p>Natural character and natural features and landscapes</p> <p>Amend the rules to avoid adverse effects as required by Policy 15 of the NZCPS.</p>	Oppose in part	The Oil Companies are not necessarily opposed to the intent of the relief sought by the submitter but reserve judgement pending specific wording of the amendments.
Forest and Bird	<p>1.7.5 Open coast</p> <p>The statement that this area is not covered by other management areas is confusing because the same can be said for each management area. This should be clarified by clearly setting out the areas covered. Amend to clarify whether the open coast is the remaining area of the CMA or coastal environment. Clarify how the values and characteristics to be protected under Policies 11, 13 and 15 of the NZCPS, will be provided for in these areas.</p>	Support	The Oil Companies have an interest in clarification of the extent of the open coast and the applicable provisions in these areas. The Oil Companies submissions were prepared on the basis that the open coast is all areas within the CMA not otherwise mapped as another coastal management area and if required, changes to support and clarify that interpretation are supported.
Forest and Bird	<p>General policies – introduction</p> <p>Amend the first paragraph: <i>This section provides the overall direction for achieving integrated management for the protection of significant <u>and outstanding values</u> and matters in the coastal environment (i.e. both the coastal marine area and areas <u>landward</u> where coastal processes, influences or qualities are significant) in order to achieve the objectives of this Plan.</i></p> <p>Amend the second paragraph as follows: <i>The policies apply to all activities in the coastal environment, regardless of which coastal management area the activity may fall within (coastal management areas are identified in Schedule 1 and their characteristics are described in Policy 1).</i></p> <p>Add reference to the extent of the coastal environment set out on the planning maps.</p>	Support in part	The Oil Companies support the amendments, particularly the mapping of the coastal environment (as set out in primary submissions).

	<p>Amend the maps to identify the extent of the coastal environment. Alternatively amend the maps to identify an indicative extent of the coastal environment.</p> <p>Support an indicative extent with policy direction to confirm the extent of the coastal environment such that in being consistent with the coastal plan district councils will identify this within district plans using a criteria set out in Policy 4 of this plan.</p> <p>Amend the introduction to clarify the extent of the coastal management areas.</p> <p>Amend the reference to Schedule 1 to clarify that the schedule lists Policy 1(a), (b), (c) and (e) areas with links to the planning maps and that the Open Coast management area is not identified.</p>		
Forest and Bird	<p>New policies to achieve Objective 5</p> <p>Add new policies to achieve Objective 5 in the Plan for water quality in the coastal environment to achieve integrated management with the NPS FM and Policy 21 of the NZCPS. Include policy direction to set water quality targets and standards for freshwater and coastal water in the coastal environment to ensure that upstream water quality does not result in adverse effects in the coastal environment that are inconsistent with giving effect to the NZCPS.</p>	Oppose in part	The Oil Companies are not necessarily opposed to the intent of the relief sought by the submitter but reserve judgement pending specific wording of the amendments. Further, the setting of water quality standards and targets is a matter that should be properly justified and debated, and may need to be introduced by way of variation.
Forest and Bird	<p>Rule 22:Network utility structure erection or placement</p> <p>Support that Outstanding Value areas are not included. However a controlled activity classification does not enable council to give effect to the NZCPS outside of those areas. The placement of structures in the CMA can have noise and vibration effects on marine mammals and fish species which are not addressed by the rule provisions.</p>	Oppose in part	<p>The Oil Companies consider that the matters raised can properly be addressed by appropriate matters of control.</p> <p>The Oil Companies oppose the proposed 100m setback from Outstanding Value Management areas, which is arbitrary and not justified in terms of effects.</p>

	<p>Condition (c) is not adequate to achieve protection required by the NZCPS. It may not be possible under this rule for council to ensure the avoidance of adverse effects or of significant adverse effects as required by Policies 11(a) and (b), 13(1)(b) or 15(b) of the NZCPS.</p> <p>Activities adjacent to Outstanding value areas may adverse effects on during construction and ongoing effects relation to the occupation of space in certain locations.</p> <p>Change the rule classification to Restricted discretionary Include condition for a 100m setback from Outstanding Value management areas Include the following matters of discretion for: (x) effect on indigenous biological diversity (y) effects on natural character and natural features and landscape (z) effects on any areas of Outstanding Value.</p>		
Forest and Bird	<p>Definition: Port</p> <p>Amend to state the port is port Taranaki, alternately delete the definition.</p>	Oppose in part	The Oil Companies are not necessarily opposed to the principle of a definition of Port but note that the plan includes a mapped coastal management area for the Port. The Oil Companies seek to ensure that any definition appropriately encompasses its activities at the Port, by including both the Port itself and the coastal management area.
Fonterra	<p>Definition: Functional need</p> <p>Fonterra seeks a definition of "functional need" as follows: <u>Functional need means the need for a proposal or activity to traverse, locate or operate in a particular environment because it can only occur in that environment.</u></p>	Oppose in part	<p>The principle of a definition of functional need is supported but the Oil Companies prefer the definition proposed in its primary submissions which appropriately recognises that these assets don't necessarily have to be in the CMA and which may avoid the need for the definition of operational requirement as also proposed by the submitter (see row below).</p> <p>The Oil Companies sought the following definition be included: <u>Functional need means a requirement for a proposal or activity to traverse, locate or operate in the coastal environment, locate or operate in the coastal environment.</u></p>

Fonterra	<p>Definition: Operational Requirement</p> <p>Fonterra seeks a definition of "operational requirement" as follows: <u>Operational requirement means the requirement for a proposal or activity to traverse, locate or operate in a particular environment because of technical or operational characteristics or constraints.</u></p>	Oppose in part	The principle of a definition of operational need is supported if that term is used in or relevant to the Plan but the Oil Companies prefer the simplicity of a broader definition of functional need.
Taranaki Energy Watch	<p>General themes, issues and relief sought to the plan as a whole</p> <p>The submitter makes a number of general points in a section titled general themes, issues and relief sought to the plan as a whole. No specific relief is sought in this regard.</p>	Oppose	The Oil Companies do not disagree with some of the principles raised but oppose them in the absence of clear relief. It may be that the submitter considers these general themes are addressed in subsequent submission points which are addressed below.
Taranaki Energy Watch	<p>Marine Oil Spill Contingency Plan</p> <p>The Marine Oil Spill Contingency Plan (MOSCP, 2012) published by Taranaki Regional Council does not appear to have been referred to or referenced by the proposed Coastal Plan. It was referenced in the Cawthorn Buffer Distances Report on page 2 and in the References section. Appendix 4 Sensitive Site Coastal Info includes 66 sensitive sites relating to oil spills with the majority of the Taranaki coastline identified with ratings of Very High Risk and High Risk of Oil Spills. 4 This should be included and considered particularly with regards to notification and activity status.</p>	Oppose	The Oil Companies oppose the relief sought as it is unclear what amendments to notification and activity status the submitter seeks. If changes are required, it may be more appropriate to introduce these by way of variation.
Taranaki Energy Watch	<p>Precautionary principle</p> <p>While Policy 3 of the proposed Taranaki Regional Coastal Plan (PTRCP) supports a precautionary approach, those policies and rules relating to petroleum exploration and production do not take a precautionary approach. Objectives, policies and rules within the coastal marine area should reflect a precautionary regime for effects of activities that are uncertain, unknown or little understood.</p>	Oppose	The Oil Companies consider that the plan must be read as a whole and therefore the precautionary principle already applies as requested by the submitter. A consistent approach should be adopted in the Plan.

	<p>Policies that should incorporate a precautionary approach include but are not limited to:</p> <p>(i) Policy 5 (j), (ii) Policy 22, and (iii) Policy 29.</p>		
Taranaki Energy Watch	<p>Petroleum activities – Activity status</p> <p>All petroleum activities should be discretionary in the coastal marine area and non-complying in open coast, estuaries modified and port areas and prohibited in the coastal management areas of outstanding value and estuaries unmodified.</p>	Oppose	<p>The relief sought by the submitter is not specific to petroleum production activities as defined in the plan and therefore has potential to impact on range of onshore activities undertaken by the Oil Companies. Although the relief sought is unclear, noting that the rules in the coastal plan only apply in the CMA, any activities undertaken by the Oil Companies in the CMA would be discretionary. This would encompass any fuel activities undertaken on the Newton King Wharf, including any amendments to the Oil Companies existing infrastructure in this location. Such an approach is not justified and is opposed.</p>
Taranaki Energy Watch	<p>Oil and gas activities – Assessment criteria</p> <p>Assessment criteria should apply to discretionary oil and gas activities within the coastal marine area. The criteria should include consideration of low probability but significant adverse effects events and buffer zones as appropriate planning tool.</p>	Oppose in part	<p>Sections 30 and 31 of the RMA need to be read together with section 142 of the HSNO Act. Section 142 of HSNO provides that RMA instruments can only include more stringent requirements than HSNO when they are considered ‘necessary’ for the purposes of the RMA. Where the HSNO requirements are sufficient to meet the purposes of the RMA that test will not be met. Any RMA controls must also be justified in terms of section 32 of that Act. The submitter has not provided justification for the inclusion of provisions as sought.</p> <p>Further, the relief sought by the submitter is not specific to petroleum production activities as defined in the plan and therefore has potential to impact on a range of onshore activities undertaken by the Oil Companies. The principle of criteria addressing risk is not necessarily opposed if it can be justified, but in the absence of detail of the relief sought the submission is opposed. In particular the Oil Companies</p>

			consider that the primary tool for managing risk associated with its onshore activities at the port will be the district plan. In the same way that RMA and HSNO regulation should not result in duplicate control, regional and district controls should not duplicate control.
Taranaki Energy Watch	<p>Separation distances</p> <p>Separation distances should be considered on a case by case approach to ensure they are appropriate. This can only be done if the activity has discretionary status as part of discretionary assessment criteria. Objectives and policies should be added to support the use of separation and buffer zones as an appropriate planning tool/method to manage oil and gas activities in the coastal marine area.</p> <p>(i) The Council commissioned the Cawthron Buffer Distances Report published in October 2015 as part of the proposed Coastal Plan. While the report supports a 1000m buffer zone for single wells using water or synthetic drilling fluids, 6000m for multiple wells from coastal areas of outstanding value, and identifies a maximum zone of effects from 6km to 20 km for water or synthetic drilling fluids, it also strongly cautions “against a one-size-fits-all buffer zones”</p> <p>(ii) The Offshore Drilling Review Report was written prior to the Cawthron Report and therefore the former is not able to consider the findings.</p> <p>(iii) The Cawthron Report strongly supports a case by case approach for buffer zones between outstanding substrates and benthic habitats and petroleum exploration and production. Taranaki Energy Watch agrees that buffer zones are a good practice planning tool and should be considered for every application on a case by case approach. If exploration drilling occurs within 6000m from the Outstanding Value coastal management area then if production activities were to occur at a later stage the production activities would be within an area that</p>	Oppose in part	<p>The relief sought by the submitter is not specific to petroleum production activities as defined in the plan and therefore has potential to impact on a range of onshore activities undertaken by the Oil Companies.</p> <p>The Oil Companies do not agree that the use of separation and buffer zones necessitates a discretionary activity status.</p>

		potentially should be considered a buffer zone. This is not considered at the outset of applying for exploration drilling and could become a significant issue. This is not addressed by the proposed Coastal Plan and should be included within assessment criteria. It is not clear in the proposed Coastal Plan how many exploration wells can be drilled as part of “exploration and appraisal well drilling” under Rule 26. If there is more than one well drilled the Cawthron report says a much larger buffer zone could be required. This needs to be explicit in discretionary assessment criteria.		
Taranaki Council	Regional	<p>Rule 1 : Stormwater Discharges</p> <p>The Taranaki Regional Council should amend Rule 1 of the Proposed Plan relating to stormwater discharges into water or on to land in the coastal marine area (CMA) to refer to threshold values that trigger controls under <i>Hazardous Substances and New Organisms Act 1996</i>.</p> <p>Reasons: Rule 1 relates to a permitted activity rule whereby stormwater discharge activities in the CMA that do not come within or comply with the rule are discretionary activities and require a resource consent. As currently written, Rule 1 excludes industrial and trade premises that “...use or store hazardous substances”. The definition of ‘hazardous substances’ is very broad and includes many normal day-to-day items and products such as detergents, household cleaners etc. As a result, Rule 1 is likely to unnecessarily capture all industrial or trade premises – regardless of quantities and risk to the environment. The relief sought seeks minor amendments to Rule 1 and the inclusion of a schedule that identifies those hazardous substances of a type and of a quantity that warrant regulating through the resource consents process. A revised rule and schedule should be based on threshold values set out by the Environmental Protection Agency under the <i>Hazardous Substances and New Organisms Act 1996</i> (which, in turn, are based on internationally recognised measures) that trigger a</p>	Support in part	The Oil Companies do not have any discharges directly to the CMA in Taranaki but recognise the issue raised by the submitter and consider that an exclusion for high risk industrial or trade premises may be a more appropriate means of capturing premises that have potential to adversely affect water quality. An appropriate definition would recognise that mitigation, for instance containment and treatment in accordance with established industry good practice guidance (for instance the Environmental Guidelines for Water Discharges from Petroleum Industry Sites in New Zealand, MfE, 1998) would exclude a premise from being high risk. A similar approach is adopted in the Regional Fresh Water Plan for Taranaki (see Rule 23) as well as more widely in regional plans around the country.

	requirement to prepare a contingency plan and secondary containment.		
Greenpeace	<p>Oil and gas activities – Activity status</p> <p>Oil and gas activities that are in the CMA should be discretionary at a minimum and non-complying or prohibited in areas with higher natural and cultural values.</p>	Oppose	The relief sought by the submitter is not specific to petroleum production activities as defined in the plan and therefore has potential to impact on range of onshore activities undertaken by the Oil Companies. As sought by the submitter, all activities undertaken by the Oil Companies at the Newton King Wharf, including any amendments to the Oil Companies existing infrastructure in this location, would as a minimum require discretionary activity consent. This approach is not justified and is opposed.
Kiwis Against Seabed Mining	<p>Oil and gas activities – Activity status</p> <p>Oil and gas activities that are in the CMA should be discretionary at a minimum and non-complying or prohibited in areas with higher natural and cultural values.</p>	Oppose	The relief sought by the submitter is not specific to petroleum production activities as defined in the plan and therefore has potential to impact on range of onshore activities undertaken by the Oil Companies. As sought by the submitter, all activities undertaken by the Oil Companies at the Newton King Wharf, including any amendments to the Oil Companies existing infrastructure in this location, would as a minimum require discretionary activity consent. This approach is not justified and is opposed.
Heritage NZ	<p>Policy hierarchy</p> <p>Heritage NZ considers that the general policies should take precedence and the activity-based policies function be to provide additional detail.</p> <p><u>Where a policy in this section conflicts with a general policy in 5.1, the general policy takes precedence.</u></p>	Oppose	The Oil Companies consider the Plan should be read as a whole and are concerned that if preference is given to the general policies (which are predominantly those seeking to protect, then the plan will not provide appropriately for a range of activities that have a functional need to operate in the coastal environment. Furthermore, the general approach to policy interpretation is that the specific policies take precedence over the general. To reverse that presumption could have widespread and unintended and consequences.
Heritage NZ	<p>Definition: Alteration</p> <p><u>Alteration – in relation to structures, means any changes to the function, layout, or appearance of a structure without changing its physical dimensions.</u></p>	Oppose	The narrow definition of alteration is opposed, particularly the exclusion of any changes to the physical dimensions of a structure.

Heritage NZ	<p>Definition: Maintenance</p> <p><i><u>Maintenance means the ongoing protective care of a place.</u></i></p>	Oppose	<p>In applying only to a place, the definition is particularly narrow and does not encompass the range of activities that may constitute maintenance. The definition of maintenance in the proposed plan, subject to amendments set out in the Oil Companies submission, is preferred.</p>
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**NOTICE OF FURTHER SUBMISSION BY POWERCO LIMITED TO THE PROPOSED COASTAL PLAN FOR
TARANAKI PURSUANT TO CLAUSE 8 OF THE FIRST SCHEDULE OF THE RESOURCE MANAGEMENT
ACT 1991**

To: Taranaki Regional Council
47 Cloten Road
Private Bag 713
Stratford 4352
NEW ZEALAND

coastal@trc.govt.nz

Submitter: Powerco Limited (*Powerco*)
Private Bag 2061
New Plymouth 4342

Address for Service: BURTON PLANNING CONSULTANTS LIMITED
Level 1, 2-8 Northcroft Street
PO Box 33-817, Takapuna,
AUCKLAND 0740

Attention: Mark Laurenson

Phone: (09) 917-4302

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Email: [mlaurenson@burtonconsultants.co.nz](mailto:m Laurenson@burtonconsultants.co.nz)

File ref: 16/093.1

- 1 Powerco's further submissions are as contained in the attached Table.
- 2 Powerco's interest in the proposed plan is greater than the interest of the general public.
- 3 Powerco wishes to be heard in support of its further submissions.
- 4 If others make similar submissions, Powerco would be prepared to consider presenting a joint case with them at any hearing.

Dated at AUCKLAND this 3rd day of August 2018

A handwritten signature in black ink, appearing to read 'Mark Laurensen', with a long horizontal flourish extending to the right.

Mark Laurensen

Authorised to sign on behalf of Powerco

Submission	Relief Sought By Submitter (additions in underline, deletions in strike through)	Position of Further Submitter	Reason For Support / Opposition and Relief Sought by Further Submitter.
Trans-Tasman Resources Limited	<p>Policy 5: Appropriate use and development of the coastal environment</p> <p>(c) – Amend to recognise that an alternatives assessment, and the need for an activity to be the BPO, is not always required, in particular, where there are not significant adverse effects.</p> <p><i>the appropriateness of the proposed design, methodology, whether it is the best practicable option and the location or route of the activity in the context of the receiving environment and, <u>where there are deemed to be significant adverse effects, any possible alternatives;</u></i></p> <p>(e) The words “pose a threat’ are uncertain and should be amended to refer to risk.</p> <p><i>the degree to which the activity will be threatened by, or contribute to, coastal hazard risk, or pose a threat to public health and safety <u>risks</u> with particular reference to Policy 20;</i></p> <p>(f) and (g) – Refer to maintenance as well as restoration and enhancement to be consistent with the higher order policy documents.</p>	Support	The relief proposed by the submitter improves the clarity of the policy and is consistent with the requirements of the RMA in relation to alternatives and the BPO.
Trans-Tasman Resources Limited	<p>Policy 8: Areas of outstanding value</p> <p>Amend the policy to specifically recognise that it may not be appropriate to avoid all adverse effects, and may indeed be appropriate to allow minor or transitory effects.</p> <p><i>Protect the visual quality and the physical, ecological and cultural integrity of coastal areas of outstanding value identified in Schedule 1 from inappropriate use and development by:</i></p>	Support	The principle of introducing wording to specifically recognise that it may be appropriate to allow minor or transitory effects is in keeping with case law and is supported.

	<i>(a) avoiding adverse effects of activities (other than minor or transitory effects) on the values and characteristics identified in Schedule 2 that contribute to areas: ...</i>		
Federated Farmers	<p>Policy 8: Areas of outstanding value</p> <p>Federated Farmers has concerns with the reference to protection of amenity values both within and near areas of outstanding value. The reference could capture a large and undefined area of land surrounding the scheduled features. By the inclusion of the term ‘or adjoining’ and by reference to maintaining views of the landscapes and features, this policy potentially manages areas beyond both the coastal marine area and the scheduled features. Case law has indicated that it may be acceptable to allow activities that have minor or transitory adverse effects in outstanding areas and still give effect to Policies 11, 13, and 15 of the NZCPS.</p> <p>Amend the policy as below: <i>Protect the visual quality and the physical, ecological and cultural integrity of coastal areas of outstanding value identified in Schedule 1 from inappropriate use and development by:</i> <i>(a) avoiding adverse effects of activities on the values and characteristics identified in Schedule 2 that contribute to areas:</i> <i>(i) having outstanding natural character; and/or</i> <i>(ii) being outstanding natural features and landscape’</i> <i>Within or adjoining coastal management area – Outstanding Value; and</i> <i>(b) maintaining significant seascapes and visual corridors associated with outstanding natural features and landscapes, including views from within the landscapes or features, and views of the landscapes and features.</i></p>	Support in part	<p>The changes sought provide improved clarity with regard to the effect of the policy on areas in proximity to scheduled areas of outstanding value. While it is recognised and accepted that the Coastal Plan has effect over both the CMA and the coastal environment, the extent to which the Policy applies should be clearly and appropriately identified, and activities adjacent to such areas should not be unnecessarily constrained or subject to more than one regulatory approach (eg: regional and district), unless those approaches clearly have different intent.</p> <p>This is important to the ongoing operation, maintenance, development and upgrade of Powerco’s network.</p>
South Taranaki District Council	Policy 19: Surf breaks and significant surfing areas	Support in part	Powerco supports the intent of the submission in so much as it will ensure Policy 19 does not unduly restrict the necessary

	<p>Amend policy 19 as follows: <i>Avoid, <u>remedy or mitigate significant adverse effects on:</u></i> or Removal of reference to natural character and amenity values from Policy 19 e(2).</p> <p>The Council considers that it is not appropriate to avoid all adverse amenity or natural character effects on the area stretching from South Taranaki’s northern boundary to Cape Road and also near regionally significant surf breaks. Section 104 of the RMA requires councils to consider (inter alia) any relevant provisions of a plan or proposed plan. This means the District Council, when discharging its functions under the proposed South Taranaki District Plan 2015, would need to consider provisions in the proposed Regional Coastal Plan for Taranaki. Including this provision as it currently appears would make it very difficult for any activity that gives rise to any adverse effects on amenity or natural character to find support because the policy does not refer to any acceptable level of effects or provide for effects to be remedied or mitigated. This could potentially affect the provision of infrastructure supporting those surf breaks such as car parking and ablution facilities. Policy 16(b) of the NZCPS refers to managing other activities effects on access to and enjoyment of surf breaks. The Council’s position is that Policy 19 seeks to provide a higher level of protection to a wider area than that identified in the NZCPS.</p>		<p>provision of gas and electricity infrastructure to serve development in the coastal environment.</p>
<p>South Taranaki District Council</p>	<p>Schedule 7 – Significant Surfing Area</p> <p>Align inland edge of ‘Significant Surfing Area’ with the coastline. The District Council considers that the significant surfing area should be restricted to areas where surfing can take place. If this area is the area where natural character and amenity effects are to be considered then this should be made clear.</p>	<p>Support in part</p>	<p>Powerco supports further consideration of the inland extent of the Significant Surfing Area to ensure the provisions do not unduly restrict the provision of gas and electricity infrastructure in the coastal environment.</p>

<p>Federated Farmers</p>	<p>Policy 19: Surf breaks and significant surfing areas</p> <p>Shift the inland boundary of the Significant Surfing Area seaward to MHWS or similar, to avoid potential (and probably unintended) restrictions on normal farming activities.</p> <p>Amend Policy as follows:</p> <p><i>Protect surf breaks and their use and enjoyment from the adverse effects of other activities <u>in the Coastal Marine Area</u> by:</i></p> <p><i>(a) avoiding adverse effects on:</i></p> <p><i>(i) all nationally significant surf breaks as identified in Schedule 7; and</i></p> <p><i>(ii) all surf breaks within the designated Significant Surfing Area as identified in Schedule 7</i></p> <p><i>(b) avoiding adverse effects on all regionally significant surf breaks, identified in Schedule 7, that are outside of the Significant Surfing Area;</i></p> <p><i>Unless the activity is necessary for the provision of regionally important infrastructure <u>or farming activities</u>, avoidance of effects is not possible and adverse effects are remedied or mitigated.</i></p> <p><i>(c) avoiding, remedying or mitigating adverse effects on all locally significant surf breaks listed in Schedule 7;</i></p> <p><i>(d) within the Significant Surfing Area, avoiding significant adverse effects and avoiding, remedying or mitigating other adverse effects on seascape, including development <u>within the Coastal Marine Area</u> which would have an adverse effect on the remote feel of the area; and</i></p> <p><i>(e) in managing adverse effects in accordance with clauses (a), (b) and (c), having regard to:</i></p> <p><i>(i) effects on the quality or consistency of the surf break by considering the extent to which the activity may change or interrupt coastal sediment dynamics; change or interrupt swell within the swell corridor including through the</i></p>	<p>Support part in</p>	<p>The focus on the CMA is supported as it is activities in this location that have the greatest potential to affect surf breaks and significant surfing areas.</p> <p>Powerco seeks to ensure that the provisions do not unduly restrict the provision of gas and electricity infrastructure in the coastal environment where it falls within significant surfing areas.</p>
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	<p><i>reflection, refraction or diffraction of wave energy; or change the morphology of the foreshore or seabed; and</i></p> <p><i>(ii) the effects on access to surf breaks and other qualities of surf breaks, including natural character, water quality and amenity values.</i></p>		
<p>Chorus NZ Ltd Vodafone NZ Ltd Spark NZ Trading Ltd</p>	<p>Rule 38:Existing lawfully established structure removal and replacement</p> <p>The intent of Rule 38 is supported. However, there are issues with Standards/Terms/Conditions (f) and (g). Standards/Terms/Condition (f) requires that ‘the replacement structure is built in the same location as the original structure’. This is unworkable. Typically, the telecommunications infrastructure which is being replaced needs to remain operational until the replacement structure is commissioned. As such, while it is possible to locate the replacement structure in a close proximity to the original structure, it is impossible to locate the replacement structure in the same location as the original structure. Consequently, an amendment is sought to the rule. There are two options for this amendment. One is simply to add the words ‘or similar’ between the words ‘same’ and ‘location’ within the rule. However, this does not provide the absolute clarity and measureable parameters which are necessary for permitted activity rules.</p> <p>The other option is more specific to submarine cables, which are typically the type of telecommunication infrastructure that is located in the coastal marine or coastal area. This option provides for a specific parameters in which replacement cables are to be located.</p> <p><i>Rule 38 Existing lawfully established structure removal and replacement: ...</i> <i>The Standards/Terms/Conditions are as follows</i></p>	<p>Support in part</p>	<p>Like telecommunications infrastructure, gas and electrical upgrades are typically undertaken with existing infrastructure remaining operational until the replacement structure is commissioned. Powerco therefore supports provisions which enable new structures to be replaced in similar locations, recognising the limited potential for adverse effects on a replacement basis.</p> <p>However, while Powerco recognises that the addition of the term “similar” to identify an appropriate replacement location does not have absolute clarity, it considers that a more certain terminology may be “in the same, or as close as is reasonably practicable to the same, location”. That phraseology has a greater degree of certainty and can be tested.</p> <p>Furthermore, Powerco considers that if it is adopted, the term “collaboration” should be replaced with consultation, to make it clear that the opinion is that of the SEQCP in consultation with TRC, rather than TRCs approval effectively being required as a “third party”.</p>

	<p><i>(f) the replacement structure is built in the same <u>or similar</u> location as the original structure;</i></p> <p><i>(g) the existing structure is removed completely with no waste being placed into the coastal marine area, unless the removal of the structure is considered by a <u>Suitably Experienced and Qualified Coastal Professional, in collaboration with the Regional Council, to have greater adverse effects on the environment than leaving it in place;</u></i></p> <p>OR amend Rule 38 as follows:</p> <p><i>Rule 38 Existing lawfully established structure removal and replacement: ...</i></p> <p><i>The Standards/Terms/Conditions are as follows</i></p> <p><i>(f) the replacement structure, <u>except for submarine cables or lines, is built in the same location as the original structure. A replacement submarine cable or line must be laid or suspended within a horizontal distance of no more than three times the depth of water from the cable or line which is being replaced;</u></i></p> <p><i>(g) the existing structure is removed completely with no waste being placed into the coastal marine area, unless the removal of the structure is considered by an <u>independent suitably qualified and experienced coastal practitioner, to have greater adverse effects on the environment than leaving it in place. The reasoning for this must be provided to Taranaki Regional Council;</u></i></p>		
Transpower	<p>3.1 Appropriate use and development</p> <p>Transpower supports the provision of an introductory explanation regarding the need to make provision for appropriate use and development within the Coastal Marine Area. However, an amendment is sought to recognise other constraints so as to make it clear within the proposed Coastal Plan that there are also technical, locational and/or operational reasons why an activity requires a coastal</p>	Support in part	The intent of the submission is supported. It may be possible to more succinctly achieve the same intent by adopting a comprehensive definition of functional need, as sought by Powerco

	<p>location which are not based solely on the use of the coast resource itself. Such recognition is consistent with Policy 1 of the NPSET which requires decision-makers to recognise and provide for the national, regional and local benefits of efficient electricity transmission, which may rely upon the location of National Grid assets within the coastal marine area, and Policy 3 of the NPSET which requires consideration of the constraints imposed by technical, operational and/or locational requirements when considering measures to avoid, remedy or mitigate adverse environmental effects of the National Grid. Put simply, the National Grid is linear infrastructure that has to connect generation sources with National Grid infrastructure (lines and grid exit points or substations). Therefore the National Grid has to get from A to B and may not be able to avoid coastal locations in doing so.</p> <p><i>Some activities rely upon a location in or near the coastal marine area, are dependent on the use of coastal resources, <u>or have technical, operational or locational constraints that mean they require a coastal marine area location...</u></i></p>		
Transpower	<p>Objective 2: Appropriate use and development</p> <p>Transpower largely supports Objective 2, as it has now been expanded since the Draft Plan to include ‘development’ that has to be located within the Coastal Environment, even if the activity does not specifically rely on the use of the natural and physical resources within it. However, an amendment is sought to the objective to reference technical, operational and/or locational requirements thereby making it clear that activities (such as the National Grid) which may have technical, operational and/or locational constraints and are required to be located in the coastal environment due to these requirements, are recognised. As notified, the objective infers only those activities utilising the coastal resource are provided for. The amended objective as sought would give</p>	Support in part	The intent of the submission is supported. It may be possible to more succinctly achieve the same intent by adopting a comprehensive definition of functional need, as sought by Powerco.

	<p>proper effect to Policy 6 of the NZCPS, as well as Policies 2, 3 and 5 of the NPSET.</p> <p><i>Natural and physical resources of the coastal environment are used efficiently, and activities that depend on the use and development of these resources, <u>or have technical, operational and/or locational requirements</u>, are provided for in appropriate locations.</i></p>		
Transpower	<p>Definition: Functional need</p> <p>That the term ‘functional need’ be defined, and if that definition does not include ‘technical, operational and/or locational requirement’, that separate reference to technical, operational and/or locational requirement be provided in the proposed Coastal Plan, as sought in Transpower’s submission. A suggested definition of functional need is as follows: <u>The locational, operational, practical or technical needs of an activity, including development and upgrades.</u></p>	Support in part	<p>The intent of the submission is supported. A similar definition, explicitly referencing the coastal environment, was sought by Powerco, as follows:</p> <p><u>Functional need means a requirement for a proposal or activity to traverse, locate or operate in the coastal environment.</u></p> <p>Powerco accepts that the ‘requirement’ could be further clarified with reference to “<u>locational, operational, practical or technical needs</u>”.</p>
Transpower	<p>Policy 6: Activities important to the well-being of people and communities</p> <p>Amend Policy 6 to specifically recognise existing infrastructure of national and regional importance and, in particular, electricity infrastructure as follows:</p> <p><i>Recognise and provide for new and existing infrastructure of <u>national or regional importance or of significance to the social, economic and cultural well-being of people and communities in Taranaki, including recognition of the benefits of a reliable, secure and efficient supply of electricity, subject to appropriate management of adverse environmental effects.</u></i></p> <p>As an alternative to the above relief sought, Transpower would support the provision of a standalone policy which</p>	Support in part	<p>Specific recognition of the importance of electricity supply (including both transmission and distribution) is supported and will help ensure that Powerco’s electrical assets are appropriately provided for.</p>

	recognises and provides for the benefits of a reliable, secure and efficient supply of electricity,		
Transpower	<p>Rule 22: Network utility structure erection or placement</p> <p>Rule 22 d) needs to be clarified as to whether it is the cable only which is provided for in the rule, and any consequential amendments that arise from the amendment proposed also need to be made. Rule 22 reads as follows:</p> <p><i>Controlled Activity Rule 22 Network utility structure erection or placement</i> <i>Network utility structure erection or placement where the structure is :</i></p> <p>a) a pipeline that is buried or attached to a bridge or access structure;</p> <p>b) an outfall structure which does not come within or comply with Rule 18;</p> <p>c) an intake structure;</p> <p>d) a communication or electricity cable that is buried or attached to a bridge, access structure or pole; or</p>	Support	<p>Powerco supports clarity as to whether the reference to cable includes support structures. The industry interpretation of lines/cable is that it does include support structures. This reflects the definition of 'lines' under the Electricity Act 1992 which is as follows:</p> <p><i>'lines means works that are used or intended to be used for the conveyance of electricity'.</i></p> <p>A similar definition of cable or line could be incorporated into the proposed Coastal Plan.</p>
Transpower	<p>Rule 34: Other structure erection or placement not provided for in Rules 18 to 32</p> <p>That a new discretionary activity rule be provided that provides for Regionally Significant Infrastructure (or specific to the National Grid) as a discretionary activity within areas of Outstanding Value or Estuaries Unmodified; as follows:</p> <p><u>Rule 34A - Discretionary Activity</u> <u>Outstanding Value</u> <u>Estuaries Unmodified</u> <u>Structure erection or placement associated with Regionally Significant Infrastructure (or the National Grid) and any associated works: (a) occupation of space in the common</u></p>	Support in part	<p>While Powerco seeks amendments to mapping such that none of its assets would be included within areas of Outstanding Value or Estuaries Unmodified, there remains potential for electrical and gas assets to be required in these areas to serve development. Powerco supports a discretionary pathway for development (including associated works such as maintenance and/or upgrading) of this nature and considers it should not be limited solely to the National Grid.</p>

		<i>marine and coastal area and does not come within or comply with Rules 18 to 32.</i>		
Minister of Conservation	of	<p>Mapping significant indigenous biodiversity</p> <p>To give effect to Section 6(c) of the RMA and the Regional Policy Statement for Taranaki (the RPS (Bio Policies 3 and 4, page 82)) Council must prioritise the protection, enhancement and restoration of ecosystems, habitats, and areas that have significant indigenous biodiversity values. The plan does not map any significant ecosystems, habitats or areas. Instead the plan includes a schedule of significant species and ecosystems.</p> <p>Many of the permitted activities in this plan have a condition which requires that it must not have an adverse effect on the species or ecosystems identified in Schedule 4A. However, for a number of these activities it will be difficult for plan-users to determine the effects without a proper ecological assessment. This may result in activities being undertaken on the assumption that there will be no adverse effects on significant species, without there being any assessment of these effects. Schedule 4A does not give effect to the RPS as it only lists species and ecosystems. Council has omitted habitats and areas that have significant indigenous biodiversity values. These habitats and areas could include coastal bird roosting, feeding, and nesting sites, marine mammal resting, feeding and breeding areas, and migratory routes and corridors. Without mapping these areas, they are not prioritised or afforded any protection in the rules of the plan. Relying on Schedule 4A alone to protect all significant indigenous species, ecosystems, habitats and areas is inadequate, and this approach will not maintain and enhance indigenous biodiversity and is inconsistent with the RMA, NZCPS, and RPS.</p>	Support in part	The principle of mapping areas, ecosystems and habitats that have significant indigenous biodiversity values is appropriate and supported, however Powerco reserves judgement on the nature and extent of the mapped areas, and considers that any such relief should be introduced by way of variation to the Plan.

		Map areas, ecosystems, and habitats that have significant indigenous biodiversity values.		
Minister of Conservation		<p>Objective 8: Indigenous Biodiversity</p> <p>Objective 8 refers to the protection of areas of significant indigenous biodiversity. Schedule 4A identifies species and ecosystems but the plan does not identify or map any areas of significant biodiversity. In order to effectively protect areas of significant biodiversity, Council needs to map areas of significant indigenous biodiversity (see general submission point above).</p> <p>Map areas, ecosystems, and habitats that have significant indigenous biodiversity values.</p>	Support in part	The principle of mapping areas, ecosystems and habitats that have significant indigenous biodiversity values is appropriate and supported, however Powerco reserves judgement on the nature and extent of the mapped areas and considers that any such relief should be introduced by way of variation to the Plan.
Minister of Conservation		<p>Rule 22: Network utility structure erection or placement</p> <p>The burial of pipes and cables may have significantly different levels and types of effects compared to attaching a pipe to a bridge and should be a discretionary activity.</p> <p>Remove a “pipeline that is buried” and “a communication or electricity cable that is buried” from the activity description. Insert a new rule which deals with network utility structure erection or placement where the structure is a pipeline that is buried, or a communication or electricity cable that is buried. This rule should have a restricted discretionary classification.</p>	Oppose in part	Powerco is not necessarily opposed to a Restricted Discretionary Activity status for buried cables in the CMA but in the absence of proposed wording of the rule and related matters of discretion the rule is opposed.
Minister of Conservation		<p>Rule 35: Structure, maintenance, repair or minor alteration</p> <p>In order to minimise disturbance to the coastal environment and give effect to policy 11 of the NZCPS, conditions need to be included that address possible adverse effects arising from the use of machinery, vehicles, and the storage of materials associated with structure maintenance etc.</p>	Oppose	The proposed wording of standards addressing the matters raised has not been provided. In the absence of specific wording, the nature and effect of the standards is unclear and they are opposed. For instance, the submission seeks machinery takes the shortest and least sensitive route. There would seem to be potential that these two matters are

		<p>Vehicles in the coastal environment can result in adverse effects (including crushing, compaction, tracking, vegetation destruction and surface alteration) on vulnerable areas such as mudflats, shellfish/crab beds, saltmarsh and estuarine vegetation. Minimising these impacts can be done by such methods as choosing the shortest and least sensitive route, using small & light machinery where necessary, minimising excavation and managing weed risks.</p> <p>Include conditions which address the following matters:</p> <ul style="list-style-type: none"> • How the use of vehicles and machinery in the coastal environment will be avoided where possible, and minimised/effects mitigated where necessary (including taking the shortest and least sensitive route). • The requirement for construction equipment including spoil, litter or equipment to be removed within 24 hours of completion of any works. • The prohibition of any refuelling or fuel storage occur within the coastal environment. • Methods should be employed to avoid any fuel spillage. 		<p>contradictory, and it is not clear why there is a need to include a requirement beyond “least sensitive”.</p>
Minister of Conservation		<p>Rule 37: Network utility structure repair, alteration or extension</p> <p>There needs to be some control on the functional necessity for the structure to be extended beyond its original size.</p> <p>Amend the rule to include a provision about limiting the size of any extension.</p>	Oppose	<p>Matters of control such as the design and the size of any extension would reasonably be considered a design matter, which is already included as a matter of control. An amendment to this effect sought by the submitter is therefore considered unnecessary.</p>
Minister of Conservation		<p>Rule 38: Structure removal and replacement</p> <p>The removal and replacement of structures in the coastal environment is likely to involve the use of vehicles and machinery in the coastal environment. In order to minimise</p>	Oppose	<p>The proposed wording of standards addressing the matters raised has not been provided. In the absence of specific wording, the nature and effect of the standards is unclear and they are opposed. For instance, the submission seeks machinery takes the shortest and least sensitive route. There</p>

	<p>disturbance to the coastal environment and give effect to policy 11 of the NZCPS, conditions need to be included which address possible adverse effects arising from the use of machinery, vehicles, and the storage of materials when removing and placing structures. Vehicles in the coastal environment can result in adverse effects (including crushing, compaction, tracking, vegetation destruction and surface alteration) on vulnerable areas such as mudflats, shellfish/crab beds, saltmarsh and estuarine vegetation. Minimising these impacts can be done by such methods as choosing the shortest and least sensitive route, using small & light machinery where necessary, minimising excavation and managing weed risks.</p> <p>Include conditions which address the following matters:</p> <ul style="list-style-type: none"> • How the use of vehicles and machinery in the coastal environment will be avoided where possible, and minimised/effects mitigated where necessary (including taking the shortest and least sensitive route). • The requirement for construction equipment including spoil, litter or equipment to be removed within 24 hours of completion of any works. • The prohibition of any refuelling or fuel storage occur within the coastal environment. • Methods should be employed to avoid any fuel spillage. 		<p>would seem to be potential that these two matters are contradictory, and it is not clear why there is a need to include a requirement beyond “least sensitive”.</p>
Minister of Conservation	<p>Rule 44: Structure removal or demolition</p> <p>The removal or demolition of structures from the coastal environment is likely to involve the use of vehicles and machinery in the coastal environment. With the same reasoning as above (submission on rule 38 (and 35)), there needs to be greater controls around the use of machinery,</p>	Oppose	<p>The proposed wording of standards addressing the matters raised has not been provided. In the absence of specific wording, the nature and effect of the standards is unclear and they are opposed. For instance, the submission seeks machinery takes the shortest and least sensitive route. There would seem to be potential that these two matters are contradictory, and it is not clear why there is a need to include a requirement beyond “least sensitive”.</p>

		<p>vehicles, and the storage of materials when removing and demolishing structures.</p> <p>Include conditions which address the following matters:</p> <ul style="list-style-type: none"> • How the use of vehicles and machinery in the coastal environment will be avoided where possible, and minimised/effects mitigated where necessary (including taking the shortest and least sensitive route). • The requirement for construction equipment including spoil, litter or equipment to be removed within 24 hours of completion of any works. • The prohibition of any refuelling or fuel storage occur within the coastal environment. • Methods should be employed to avoid any fuel spillage. 		
Minister Conservation	of	<p>Definition: Natural feature</p> <p>This definition should include more specific references to the identifying characteristics outlined in Policy 15(c) of the NZCPS. Amend definition to better reflect policy 15 of the NZCPS.</p>	Oppose	In the absence of proposed wording, the amendments sought and their potential implications are unclear.
Minister Conservation	of	<p>Definition: Natural character</p> <p>This definition should have regard to the specific provisions of policy 13 of the NZCPS. Amend definition to better reflect policy 13 of the NZCPS.</p>	Oppose	In the absence of proposed wording the amendments sought and their potential are unclear.
First Gas Limited		<p>Rule 34: Other structure erection or placement not provided for in Rules 18 to 32</p> <p>Amend to make Network Utility Pipeline Erection or Placement be classified as a Controlled Activity in the</p>	Support in part	While Powerco seeks amendments to mapping such that none of its assets would be included within areas of Outstanding Value or Estuaries Unmodified, there remains potential for electrical and gas assets to be required in these areas to serve development. Powerco supports an alternative activity status that focuses the decision on pertinent matters.

	<p>Outstanding Value area for underground pipelines or pipelines attached to existing bridge or access structures.</p> <p>Additional erection or placement of new network utility pipelines may be necessary in the future for public safety, efficient operation or increasing capacity and it is likely that any additional pipeline infrastructure would be placed in existing network corridors. Some of these corridors cross areas the TRC has identified as 'Outstanding Value' – at the Patea River Mouth, Tongaporutu Estuary and potentially at Waitotara River Mouth. The erection or placement of new pipelines has potential to have temporary adverse effects but if properly designed, located and installed, these can be avoided, remedied or mitigated. In the long term, where the pipelines are buried/under-bored or attached to existing lawfully established bridges or access structures, there are negligible effects on landscape and scenic values and permanent effects on ecological values are unlikely. As a controlled activity, such activities would still be assessed against relevant policies and objectives, and would have to adhere to performance criteria. Non-complying activities suggest that consent will only be granted in exceptional circumstances, and accordingly First Gas consider this onerous given the temporary and minor effects of their activities, the fact that their structures already exist in the corridors identified, and their overall national importance. Allowing for underground pipelines or pipelines attached to existing bridge or access structures as a controlled activity would be consistent with Policies 31 and 32 which allow placement of structures that provide for efficient operation of nationally and regionally important infrastructure subject to the appropriate management of adverse effects. Standards terms and conditions similar to Rule 22 are sought.</p>		<p>Powerco does not consider the rule needs to be restricted to pipelines, noting that a range of other network utility structures may be appropriate in these areas.</p>
First Gas Limited	Rule 37: Network utility structure repair, alteration or extension	Support in part	The intent of the submission is supported, although it is noted that Rule 35 already provides a permitted activity pathway for maintenance, repair or minor alteration, except at the Port.

	<p>Amend to make network utility pipeline repair, alteration or extension within Outstanding Value, Estuaries Unmodified, Estuaries Modified, Open Coast and Port a Permitted Activity</p> <p>Repair, alteration or extension is necessary for public safety and efficient operation and more than often need to be immediately done. It is considered that this can be appropriately managed by way of permitted activity standards, terms and conditions that reflect the values of the area of the works, rather than having to seek consent in every case.</p>		<p>Powerco reserves judgement on the specific provisions of the proposed permitted activity rule and how this will sit alongside the existing cascade, particularly Rule 35.</p>
First Gas Limited	<p>Rule 38: Structure removal and replacement</p> <p>Gas pipelines fall under petroleum production installations and pipelines and these are excluded in this rule, making them discretionary in the Estuaries Modified, Open Coast and Port areas and noncomplying within the Estuaries Unmodified, and Outstanding value areas. Network utility pipeline removal and replacement within Outstanding Value and Estuaries Unmodified, Estuaries Modified and Port be classified as Permitted and be included under Rule 38, or under a separate rule.</p> <p>*[Note that First Gas sought differentiation from petroleum installations under the South Taranaki District Plan as it infers contamination potential. The natural gas transmission network serves a differing purpose to that of the petroleum and provides for the social, economic and well being of communities both within Taranaki and the North Island. First Gas would prefer a separate rule to petroleum, as its infrastructure is existing within these environments and should be recognised as such. In order to provide for downstream communities the plan also needs to cater to network operational and maintenance activities in a timely manner.]</p>	Neutral	<p>Powerco considers its gas transmission pipelines are addressed under Rule 38, not in the rules relating to petroleum production. On this basis Powerco is neutral with regard to the changes sought by the submitter to Rule 38.</p> <p>However, if there is some uncertainty that gas transmission pipelines are addressed under Rule 38, then this should be clarified to avoid later misinterpretation. This could be achieved through a consequential amendment, perhaps an advice note, a clarification to the wording of the rule or a definition.</p>
Port Taranaki Limited	Objective 2: Appropriate use and development	Support in part	Powerco supports the principle of amendments to objective 2, or a new objective, to better provide for provision of

	<p>While PTL recognises that the objectives in Section 4 are high level, it is considered that this objective does not appropriately recognise the strategic importance of infrastructure such as Port Taranaki, and the need to be able to further develop the Port and other regionally significant infrastructure.</p> <p>Add a new objective or amend Objective 2 to specifically address provision for ongoing development of strategically significant regional and national infrastructure, including Port Taranaki at the objective level, to give effect to the Regional Policy Statement.</p>		<p>significant infrastructure and give effect to the RPS, but reserves judgement on the value of the inclusion of specific provisions depending on intent, outcome, wording and scope.</p>
RNZ	<p>Policy 5: Appropriate use and development of the coastal environment</p> <p>RNZ supports the recognition of the ‘functional need’ for activities to be located in the ‘coastal marine area’, however RNZ submits that this should also refer to the functional need for activities to be located within the wider ‘coastal environment’, as the first part of the Policy clearly refers to ‘use and development of the coastal environment’. RNZ suggests the following amendment:</p> <p><i>a) the functional need for the activity to be located in the coastal marine area <u>or the coastal environment</u>. Conversely, activities that do not have a functional need to be located in the coastal marine area <u>or the coastal environment</u> generally should not be located there...</i></p>	Support	<p>Powerco’s submission similarly seeks that functional need applies to both the CMA and Coastal Environment and seeks to ensure that the policy does not narrow the definition of functional need sought in its submission.</p>
Forest and Bird	<p>Coastal management area approach</p> <p>The application of management areas landward of the CMA is uncertain.</p> <p>Amend Policy 1 to set out an area based management approach based on mapped and scheduled areas. Refer to relevant policies to identify characteristics in those areas which are not already for those areas in a schedule.</p>	Support	<p>Clarification regarding the landward extent of the management areas is supported. Powerco’s submissions were prepared on the basis that these areas apply as mapped, including beyond the CMA. As the Open Coast is not mapped beyond the indicative CMA boundary, it was understood that the Open Coast only applied in the CMA.</p>

Forest and Bird	<p>Coastal management area approach</p> <p>Include a statement that Policy 1 does not provide direction for subdivision, use or development activities within the management areas.</p>	Oppose part	in	Powerco is not necessarily opposed to the intent of the relief sought by the submitter but reserves judgement pending specific wording of the amendments.
Forest and Bird	<p>Natural character and natural features and landscapes</p> <p>Add a new policy to provide a basis for determining/identifying ONC to achieve Policy 13 of the NZCPS.</p>	Oppose part	in	Powerco is not necessarily opposed to the intent of the relief sought by the submitter but reserves judgement pending specific wording of the amendments.
Forest and Bird	<p>Natural character and natural features and landscapes</p> <p>Add a schedule setting out the values and characteristics of identified areas of high natural character</p>	Oppose		These are already provided via map links in Schedule 1.
Forest and Bird	<p>Natural character and natural features and landscapes</p> <p>Add a new policy to preserve areas of High natural character</p>	Oppose part	in	Powerco is not necessarily opposed to the intent of the relief sought by the submitter but reserves judgement pending specific wording of the amendments.
Forest and Bird	<p>Natural character and natural features and landscapes</p> <p>Add a new policy for other natural features and landscapes in all other areas of the coastal environment</p>	Oppose part	in	Powerco is not necessarily opposed to the intent of the relief sought by the submitter but reserves judgement pending specific wording of the amendments.
Forest and Bird	<p>Natural character and natural features and landscapes</p> <p>Amend the rules to avoid adverse effects as required by Policy 15 of the NZCPS.</p>	Oppose part	in	Powerco is not necessarily opposed to the intent of the relief sought by the submitter but reserves judgement pending specific wording of the amendments.
Forest and Bird	<p>Indigenous Biological Diversity</p> <p>Amend Policy 14 or add a new policy which includes criteria to identify significant indigenous biodiversity with those characteristics and values in Policy 14. Use the criteria provided in Appendix 2 of this submission.</p>	Oppose part	in	Powerco is not necessarily opposed to the intent of the relief sought by the submitter but reserves judgement pending specific wording of the amendments.
Forest and Bird	<p>Indigenous Biological Diversity</p> <p>Ensure policy direction provides for integrated management and protection of significant indigenous biodiversity areas</p>	Oppose part	in	Powerco is not necessarily opposed to the intent of the relief sought by the submitter but reserves judgement pending specific wording of the amendments.

	on land and in the CMA from adverse effects of activities in marine and terrestrial environments.		
Forest and Bird	<p>Indigenous Biological Diversity</p> <p>Add a schedule of areas of significant indigenous biodiversity in the CMA identified using the criteria above, and which sets out the values and characteristics that contribute to significance of each area. Include the significant areas identified in the New Plymouth District Plan. Also include the relevant Important Bird Areas for New Zealand Seabirds as show in Appendix 3 to this submission).</p>	Oppose in part	Powerco is not necessarily opposed to the intent of the relief sought by the submitter but reserves judgement pending full detail of the schedule.
Forest and Bird	<p>Indigenous Biological Diversity</p> <p>Add a separate policy for the maintenance and enhancement of indigenous biodiversity in the coastal environment.</p>	Oppose in part	Powerco is not necessarily opposed to the intent of the relief sought by the submitter but reserves judgement pending specific wording of the new provision.
Forest and Bird	<p>Indigenous Biological Diversity</p> <p>Amend permitted activities by replacing references to avoiding adverse effects on Policy 11 matters with permitted activities that limit the activity type, scale, and location to the extent that the activity will not have an adverse effect which is inconsistent with council's responsibilities to achieve Policy 11 of the NZCPS.</p>	Oppose in part	Powerco is not necessarily opposed to the intent of the relief sought by the submitter but reserves judgement pending specific wording of the amendments.
Forest and Bird	<p>1.7.5 Open coast</p> <p>The statement that this area is not covered by other management areas is confusing because the same can be said for each management area. This should be clarified by clearly setting out the areas covered. Amend to clarify whether the open coast is the remaining area of the CMA or coastal environment. Clarify how the values and characteristics to be protected under Policies 11, 13 and 15 of the NZCPS, will be provided for in these areas.</p>	Support	Powerco has an interest in clarification of the extent of the open coast and the applicable provisions in these areas. Powerco's submissions were prepared on the basis that the open coast is all areas within the CMA not otherwise mapped as another coastal management area. If required, changes to support and clarify that interpretation are supported.

Forest and Bird	<p>General policies – introduction</p> <p>Amend the first paragraph: <i>This section provides the overall direction for achieving integrated management for the protection of significant <u>and outstanding values</u> and matters in the coastal environment (i.e. both the coastal marine area and areas <u>landward</u> where coastal processes, influences or qualities are significant) in order to achieve the objectives of this Plan.</i></p> <p>Amend the second paragraph as follows: <i>The policies apply to all activities in the coastal environment, regardless of which coastal management area the activity may fall within (coastal management areas are identified in Schedule 1 and their characteristics are described in Policy 1).</i></p> <p>Add reference to the extent of the coastal environment set out on the planning maps.</p> <p>Amend the maps to identify the extent of the coastal environment. Alternatively amend the maps to identify an indicative extent of the coastal environment.</p> <p>Support an indicative extent with policy direction to confirm the extent of the coastal environment such that in being consistent with the coastal plan district councils will identify this within district plans using a criteria set out in Policy 4 of this plan.</p> <p>Amend the introduction to clarify the extent of the coastal management areas.</p> <p>Amend the reference to Schedule 1 to clarify that the schedule lists Policy 1(a), (b), (c) and (e) areas with links to</p>	Support in part	Powerco supports the amendments, particularly the mapping of the coastal environment (as set out in primary submissions).
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	the planning maps and that the Open Coast management area is not identified.		
Forest and Bird	<p>Rule 22: Network utility structure erection or placement</p> <p>Support that Outstanding Value areas are not included. However a controlled activity classification does not enable council to give effect to the NZCPS outside of those areas. The placement of structures in the CMA can have noise and vibration effects on marine mammals and fish species which are not addressed by the rule provisions. Condition (c) is not adequate to achieve protection required by the NZCPS. It may not be possible under this rule for council to ensure the avoidance of adverse effects or of significant adverse effects as required by Policies 11(a) and (b), 13(1)(b) or 15(b) of the NZCPS. Activities adjacent to Outstanding value areas may adverse effects on during construction and ongoing effects relation to the occupation of space in certain locations.</p> <p>Change the rule classification to Restricted discretionary Include condition for a 100m setback from Outstanding Value management areas Include the following matters of discretion for: (x) effect on indigenous biological diversity (y) effects on natural character and natural features and landscape (z) effects on any areas of Outstanding Value.</p>	Oppose in part	<p>Powerco considers that the matters raised can properly be addressed by appropriate matters of control.</p> <p>Powerco opposes the proposed 100m setback from Outstanding Value Management areas, which is arbitrary and not justified in terms of effects.</p>
Forest and Bird	<p>New definition: Minor alteration or extension</p> <p>Minor alteration or extension means, the alteration of a structure where the alteration or extension is within the same footprint, does not result in an increase in adverse effects over effects generated from the operation and maintenance of the structure.</p>	Oppose in part	<p>Powerco is not necessarily opposed to the intent of the relief sought by the submitter but opposes the proposed wording, particularly the requirement that the structure is within the same footprint. Furthermore the need for the definition is questioned because the matters addressed in it are, or can be, addressed in the rule.</p> <p>Alterations and extensions to gas and electricity assets are often undertaken with existing infrastructure remaining</p>

			operational while new assets are commissioned. Powerco therefore supports provisions which enable these alterations, for instance replacement support structures, to be established in similar locations, recognising the limited potential for adverse effects on a replacement basis.
Forest and Bird	<p>New definition: Major alteration or Extension</p> <p>Any alteration or extension which does not meet the definition of minor alteration or extension.</p>	Oppose	Powerco is not necessarily opposed to the intent of the relief sought by the submitter subject to appropriate wording of the corresponding definition of minor alteration or extension, and to it being able to be demonstrated that such a definition is necessary (ie: that the policy provisions and/or rules specifically refer to a major alteration or extension and the definition of the same is not clear).
Fonterra	<p>Policy 1: Coastal management areas</p> <p>Fonterra supports Policy 1 in part, and seeks an amendment to sub-clause (d) to specifically recognise the presence of infrastructure and activities in the Open Coast that are necessary to enable people and communities to provide for their economic and social wellbeing.</p> <p><u>(v) may contain infrastructure, structures and activities that enable people and communities to provide for their economic and social wellbeing.</u></p>	Support	Powerco sought similar recognition of infrastructure in other management areas and considers it would be appropriate to similarly recognise the presence of this infrastructure in the Open Coast.
Fonterra	<p>Definition: Functional need</p> <p>Fonterra seeks a definition of "functional need" as follows: <u>Functional need means the need for a proposal or activity to traverse, locate or operate in a particular environment because it can only occur in that environment.</u></p>	Oppose in part	<p>The principle of a definition of functional need is supported but Powerco prefers the definition proposed in its primary submissions which appropriately recognises that these assets don't necessarily have to be in the CMA and which may avoid the need for the definition of operational requirement as also proposed by the submitter (see row below).</p> <p>Powerco sought the following definition be included: <u>Functional need means a requirement for a proposal or activity to traverse, locate or operate in the coastal environment.</u></p>

Fonterra		<p>Definition: Operational requirement</p> <p>Fonterra seeks a definition of "operational requirement" as follows: <u>Operational requirement means the requirement for a proposal or activity to traverse, locate or operate in a particular environment because of technical or operational characteristics or constraints.</u></p>	Oppose in part	The principle of a definition of operational need is supported if that term is used in or relevant to the Plan but Powerco prefers the simplicity of a broader definition of functional need.
Taranaki Council	Regional	<p>Schedule 2</p> <p>The Taranaki Regional Council should amend Schedule 2 of the Proposed Plan to align the mapping of Outstanding Natural Character Areas with those mapped by the South Taranaki District Council through their district plan review. Reasons: The Taranaki Regional Council liaised closely with South Taranaki District Council in the identification of Outstanding Natural Character Areas for inclusion in our respective coastal and district plans. Minor discrepancies have been noted between the respective plans and granting the relief will promote better integrated management within the wider coastal environment.</p>	Support in part	Powerco has not analysed the differences between the mapped ONC in the proposed plan with those in the South Taranaki District Plan but supports the intent of aligning them.
Heritage NZ		<p>Definition: Alteration</p> <p><u>Alteration – in relation to structures, means any changes to the function, layout, or appearance of a structure without changing its physical dimensions.</u></p>	Oppose	The narrow definition of alteration is opposed, particularly the exclusion of any changes to the physical dimensions of a structure.
Heritage NZ		<p>Definition: Maintenance</p> <p><u>Maintenance means the ongoing protective care of a place.</u></p>	Oppose	In applying only to a place, the definition is particularly narrow and does not encompass the range of activities that may constitute maintenance. The definition of maintenance in the proposed plan, subject to amendments set out in the Powerco submission, is preferred.

Further submission on the Proposed Coastal Plan for Taranaki in response to submitter Trans Tasman Resources Limited

The South Taranaki Underwater Club wish to make a further submission in regard to Page 30 of the TTRL objection in relation to Chapter 8 Rules. (d) Schedules:

Namely Schedule 2; Schedule 4A and Schedule 4B.

Schedule 2.

The South Taranaki Underwater Club supports the inclusion of the 'Project Reef' as an area of outstanding value - ONC6 in the Taranaki Regional Council's Proposed Coastal Plan.

Project Reef Life under the guidance of the South Taranaki Underwater Club and its scientific advisors have evidence that the 'Project Reef' meets all the requirements of an area of outstanding value and contend that there is now more available data and evidence on this particular site than any other recognised site in the South Taranaki Bight.

Over the last two years the Project Reef Life team have used many recognised scientific methods including acoustic, 24 hour in-situ camera video, plankton retrieval, water turbidity assessment, baited underwater video, catch & release studies by local school students to determine that this reef plays an important part in the ecological framework of the South Taranaki Bight. The work has been recognised as 'significant' by scientists in national institutions, such as NIWA, DOC, and TePapa to name a few. Our work is also supported by several New Zealand Universities and their specialized staff.

The Project team is now in a position to continue this work into the foreseeable future and sees this project as one that is able to play a significant and scientifically recognised role in the education of our younger generation. It has also gained recognition from Puke Ariki - the Taranaki Museum where a long term display is planned for late 2019.

The 'Project Reef' will play a vital part in the future monitoring and understanding of our marine environment, including the evolution of the Restore Taranaki Project.

Schedule 4A:

The South Taranaki Underwater Club and Project team support the inclusion of threatened species within the South Taranaki Bight as we have already discovered fauna, considered as 'under threat' including species possibly 'new to science'.

The discovery of juvenile fish species not normally observed in the South Taranaki Bight and generally under threat in many coastal areas also leads us to believe the area is a fertile breeding ground for many species.

Inclusion of threatened species within the South Taranaki Bight would indicate Taranaki Regional Council is working in the best interest of the marine environment.

Schedule 4B:

The South Taranaki Underwater Club and Project team support the retention of sensitive marine benthic habitats within the Draft Coastal Plan.

The Project Reef rock formation has yet to be finally carbon dated, however some of the latest data based on samples of imbedded marine fossils suggests the reef to be at least two million years old. As such it is a repository for scientific research into the future. The full extent of the sensitivity of the entire South Taranaki Bight is yet to be fully discovered and as such must receive protection now.



Department of Conservation
Te Papa Atawhai

DOCDM-5541018

3 August 2018

Chief Executive
Taranaki Regional Council
Private Bag 713
Stratford 4352

Attention: Basil Chamberlain

Further Submission on the Proposed Regional Coastal Plan for Taranaki

Please find enclosed the further submission by the Minister of Conservation in respect of the Proposed Regional Coastal Plan for Taranaki.

Please contact Angus Gray in the first instance if you wish to discuss any of the matters raised in this further submission – 027 621 8195/ agray@doc.govt.nz

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Amy Robinson', positioned above a horizontal line.

Amy Robinson
Planning and Land Manager
Hauraki Waikato Taranaki

**FURTHER SUBMISSION IN SUPPORT OR OPPOSITION TO, SUBMISSION ON PUBLICLY NOTIFIED
PROPOSED COASTAL PLAN FOR TARANAKI**

Clause 8 of Schedule 1, Resource Management Act 1991

TO: **Taranaki Regional Council**

NAME: **Minister of Conservation**

1. This is a further submission in support of and in opposition to submissions on the following proposed regional coastal plan:
 - 1.1. Proposed Coastal Plan for Taranaki (“**pCPT**”)
2. I am a person representing a relevant aspect of the public interest for the following reason:
 - 2.1. I have delegated authority in relation to the Minister of Conservation’s statutory responsibilities under the Resource Management Act 1991, including in relation to the New Zealand Coastal Policy Statement 2010.
3. I support or oppose the submissions of those persons and/ or organisations listed in the second column headed “Submitter Name” of Table 1 attached.
4. The particular parts of the submission I support or oppose are identified in the third column headed “Submission” of Table 1.
5. The reasons for my support or opposition are set out under the fifth column headed “Reasons” of Table 1.
6. In relation to those submissions I support I seek that the submission is allowed.
7. In relation to those submissions I oppose I seek that the part of the submission I oppose is disallowed.
8. I wish to be heard in support of my further submission.
9. If others make similar submissions I will consider presenting a joint case with them at the hearing.



Amy Robinson
Planning and Land Manager
Hamilton

Signed on behalf of the Minister of Conservation acting pursuant to delegated authority

Date: 3 August 2018

Note: A copy of the Instrument of Delegation may be inspected at the Director-General's office at Conservation House Whare Kaupapa Atawhai, 18/32 Manners Street, Wellington 6011.

Address for service of person making further submission:

RMA Shared Services
Department of Conservation
Private Bag 3072
Hamilton 3240

Contact person: Angus Gray
Telephone: 027 621 8195
email: agray@doc.govt.nz

Table 1: Minister of Conservation Further Submission Points

INTRODUCTION					
Plan Reference	Submitter Name	Decision Sought	Support/Oppose	Reasons	Relief sought
Section 1.7	Royal Forest and Bird Protection Society	If the coastal management area approach is to be retained, amend Section 1.7 to: <ul style="list-style-type: none"> - clarify how the coastal environment landward of the CMA is considered under this approach - clarify how this relates to the NZCPS and relevant policies in the Plan - amend reference from Schedule 1 to Schedule 2. 	Support	Amendments would increase plan clarity and give effect to the NZCPS.	I seek that the submission is allowed.
OBJECTIVES					
Plan Reference	Submitter Name	Decision Sought	Support/Oppose	Reasons	Relief sought
Objective 3	Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	Amend Objective 3 to read: <i>The use and ongoing operation, maintenance, and upgrading of nationally and regionally important infrastructure and other existing lawfully established activities is protected from new or inappropriate use and development in the coastal environment.</i>	Oppose	Upgrading should not be included as part of the 'lawfully established activity' as an upgrade implies potential future works which may have greater effects than what is lawfully established.	I seek that the submission is disallowed.
Objective 13	Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	Amend Objective 13 to read: <i>The risk of social, cultural, environmental, and economic harm from coastal hazards is not increased to unacceptable levels and public health, safety and property is not compromised by use and development of the coastal marine area.</i>	Oppose	An objective should not aim for any level of risk of social, cultural, environmental harm. Amendment is contrary to the RMA 1991, and the NZCPS.	I seek that the submission is disallowed.
PLAN POLICIES					
Plan Reference	Submitter Name	Decision Sought	Support/Oppose	Reasons	Relief sought
Section 5 - Preamble	Royal Forest and Bird Protection Society	Amend the introduction of Section 5.1 of the Plan, on page 20, to add reference to the extent of the coastal environment set out on the planning maps.	Support	Inclusion of reference to the extent of the coastal environment will provide for integrated management of both regional and district council functions, as well as give effect to the NZCPS.	I seek that the submission is allowed.
Policy 5	Trans-Tasman Resources Limited	Seek that the policy is amended to include the benefits of non-renewable resources and mineral extraction activities.	Oppose	The policy is clearly intended to recognise and provide for renewable energy and its benefits. Policy 6(2)(a) of the NZCPS does not provide for non-renewable resources.	I seek that the submission is disallowed.

New Policy 5A	Royal Forest and Bird Protection Society	Amend Plan by: <ul style="list-style-type: none"> - including a new policy that identifies appropriate places for aquaculture; AND - until 'appropriate' places are identified, ensuring Plan provisions: <ul style="list-style-type: none"> - exclude aquaculture activities from Outstanding Value, Estuaries Unmodified, Estuaries Modified coastal management areas - state that consents will not be granted for aquaculture in any area with the values and characteristics set out in Policy 14 of the Plan (as revised to address submitter's relief) - aquaculture proposals must be consistent with General Policies 1 to 21 of the Plan. 	Support	Amendment will give effect to the NZCPS, including Policy 8.	I seek that the submission is allowed.
New Policy 9A	Royal Forest and Bird Protection Society	Add a new policy to provide a basis or criteria for determining/identifying outstanding or high natural character to achieve Policy 13 of the NZCPS.	Support	The inclusion of a policy which provides criteria for the identification of areas of outstanding natural character would give effect to the NZCPS, including policies 13 and 15.	I seek that the submission is allowed.
		Amend the Plan to include a new Policy to preserve areas of High Natural Character.	Support	New policy would give effect to the NZCPS, policies 13 and 15.	I seek that the submission is allowed.
		Amend the Plan to include a new Policy for other natural character in all areas of the coastal environment.	Support	Amendments would give effect to the NZCPS, including policies 13 and 15.	I seek that the submission is allowed.
		Amend the Plan to include a new Policy to provide a basis for determining outstanding natural features and landscapes.	Support	Amendments would give effect to the NZCPS, including policies 13 and 15.	I seek that the submission is allowed.
		Amend the Plan to include a new Policy for other natural features and landscapes in all areas of the coastal environment.	Support	Amendments would give effect to the NZCPS, including policies 13 and 15.	I seek that the submission is allowed.
Policy 34	Fonterra	Amend Policy 34 to read: <i>Hard protection structures will be discouraged, and the use of alternatives promoted, whilst recognising that hard protection structures may be the only practical means to protect existing nationally and regionally important <u>industry and infrastructure</u>. [...]</i>	Oppose	The protection of 'important industry' with hard protection structures is not provided for in the NZCPS. Any amendments to the wording need to give effect to the NZCPS including Policy 27.	I seek that the submission is disallowed.

Policy 38	New Zealand Petroleum and Minerals	Amend Policy 38 to recognise additional considerations and to read as follows: <i>Structures will be removed from the coastal marine area at the expiry of their authorisation or at the end of their useful life, unless one or more of the following applies: [...] (d) the removal of the structure poses unreasonable costs or is technically unfeasible; or (e) the removal of the structure poses unreasonable risk on human health and safety.</i>	Oppose	This policy would effectively allow plan users to abandon structures in the CMA on the basis that its removal would impose unreasonable costs or be technically unfeasible. Under the Marine and Coastal Area (Takutai Moana) Act 2011 these costs would then be imposed on Taranaki Regional Council. Amendments are contrary to the RMA 1991, and the NZCPS, including Policy 6.	I seek that the submission is disallowed.
Policy 43	Trans-Tasman Resources Limited	Seek amendments so that policy refers to dredging activities for ports or nationally or regionally significant infrastructure.	Oppose	The notified policy is aimed to specifically managing the effects of dredging in Port Taranaki. Dredging outside of this area is adequately addressed in policies 40, 41, 42, and 44. Any amendment to policy needs to give effect to the NZCPS.	I seek that the submission is disallowed.
Policy 44	Trans-Tasman Resources Limited	Seek removal of 44(f) relating to the sorting of deposited material.	Oppose	Providing for the deposition of similar sized materials on the foreshore and seabed allows for managing erosion, effects on beach morphodynamics, and reducing adverse effects on indigenous biodiversity. Any amendment to the policy needs to be consistent with the NZCPS including Policy 11.	I seek that the submission is disallowed.
RULES					
Plan Reference	Submitter Name	Decision Sought	Support/Oppose	Reasons	Relief sought
Rule 26	Royal Forest and Bird Protection Society	Amend Rule 26 by amending the Activity classification to make exploration or appraisal of well drilling a Restricted Discretionary Activity (rather than a Controlled Activity).	Support	Amendments give effect to the NZCPS, including policies 11, 13, and 15.	I seek that the submission is allowed.
		Amend Rule 26 by adding matter of discretions to consider effects on indigenous biodiversity and natural character.			
		Amend Rule 26 by identifying areas of significant biodiversity and excluding these from this rule.			
Rule 28	Royal Forest and Bird Protection Society	Amend Rule 28 to make exploration or appraisal of well drilling in the Outstanding Value, Estuaries Unmodified and Estuaries Modified coastal management areas a Prohibited Activity (rather than a Non-complying Activity).	Support	Amendments give effect to the RMA 1991 and the NZCPS, including policies 11, 13, and 15.	I seek that the submission is allowed.

Rule 29	Te Runanga o Ngati Mutunga	Amend Rule 29 to include the addition of the standards/terms/conditions listed for Rule 26 with the alteration from 2,000 m to 6,000 m as outlined for that rule.	Support	Amendments would give effect to the RMA 1991 and NZCPS.	I seek that the submission is allowed.
Rule 30	Climate Justice Taranaki	Amend Rule 30 to be a Prohibited Activity (rather than a Non-complying).	Support	Amendments would give effect to RMA 1991 and NZCPS.	I seek that the submission is allowed.
Rule 34	First Gas Ltd	Amend Rule 34 to make network utility underground pipelines or pipelines attached to existing bridge or access structures in Outstanding Value coastal management area a Controlled Activity (rather than Non-complying).	Oppose	Network utility underground pipelines may have significant adverse effects in the coastal environment. A controlled activity status will not adequately manage these effects.	I seek that the submission is disallowed.
New Rule 34A	Transpower NZ Ltd	Amend Plan to include a new Discretionary Activity rule that provides for Regionally Important Infrastructure (or specific to the National Grid) in coastal management areas: Outstanding Value; Estuaries Unmodified and reads as follows: <i><u>Structure erection or placement associated with Regionally Significant Infrastructure (or the National Grid) and any associated works: (a) occupation of space in the common marine and coastal area and does not come within or comply with Rules 18 to 32.</u></i>	Oppose	Notified rule 34 adequately addresses the potential adverse effects of structures.	I seek that the submission is disallowed.
Rule 52	Trans-Tasman Resources Limited	Seek amendments to wording to remove “regionally distinctive” and “sensitive marine benthic habitats” and include “declining”.	Oppose	Proposed amendment would allow for adverse effects on sensitive marine benthic habitats and be contrary to NZCPS Policy 11.	I seek that the submission is disallowed.
Rule 60	Te Atiawa	Amend Rule 60 to change the Activity Classification to Non-complying (currently a Discretionary Activity) for the coastal management areas – Estuaries Modified and the Open Coast.	Support	Amendments would give effect to RMA 1991 and NZCPS.	I seek that the submission is allowed.

New Rule 61A	Transpower NZ Ltd	Amend Plan to include a new rule that provides for Regionally Important Infrastructure (or specific to the National Grid) and reads as follows: <u>Rule 61A - Discretionary Activity Coastal management areas: Outstanding Value; Estuaries Unmodified, Other disturbance, damage, destruction, removal or deposition associated with Regionally Significant Infrastructure (or the National Grid) and any associated works: (a) removal of sand, shell, shingle or other natural material; or (b) deposition of material in, on or under the foreshore or seabed that does not come within or comply with Rules 51 to 59, or any other Rule in this Plan including the deemed rules in the Resource Management (Marine Pollution) Regulations 1998 (Appendix 5).</u>	Oppose	Notified rule 61 adequately addresses the potential adverse effects of other disturbance, damage or destruction.	I seek that the submission is disallowed.
PLAN SCHEDULES AND					
Plan Reference	Submitter Name	Decision Sought	Support/Oppose	Reasons	Relief sought
Schedule 1	Royal Forest and Bird Protection Society	Amend Schedule 1 by identifying significant indigenous biodiversity areas and add them as individual map links for each site, under the corresponding management area. Include information that sets out the values and characteristics that contribute to the significance of each area.	Support	Inclusion of significant biodiversity areas gives effect to the Regional Policy Statement.	I seek that the submission is allowed.
Schedule 2	Trans-Tasman Resources Limited	Seek that ONC6 – Project Reef be removed from the schedule and maps.	Oppose	The removal of ONC6 will not afford the significant biodiversity and habitat any protection from significant adverse effects. The deletion would be inconsistent with the RMA 1991, and the NZCPS, in particular Policy 11.	I seek that the submission is disallowed.
Schedule 4A:	Trans-Tasman Resources Limited	Seek that Schedule 4A is deleted in its entirety or amended to remove any non-threatened species and any at risk species other than those which are listed as at risk (declining) under the New Zealand Threat Classification System.	Oppose	This will remove any and all protection for biodiversity in the coastal environment. This schedule is referred to in almost all of the rules and is the basis for the management of ecological impacts in the plan. Removing some or all of these species is contrary to the RMA and the NZCPS including Policy 11.	I seek that the submission is disallowed.
Schedule 4B	Trans-Tasman Resources Limited	Amend plan by deleting Schedule 4B in its entirety.	Oppose	Deleting schedule will afford these species no protection. Amendment sought is contrary to the RMA 1991, and the NZCPS, in particular policies 3 and 11.	I seek that the submission is disallowed.

Kasm

kiwis against seabed mining

PO Box 193
Raglan
New Zealand
Email: cindybax@gmail.com Ph: 021 772 661

4 August 2018

to: Taranaki Regional Council
By Email to: coastal@trc.govt.nz

Re: Proposed Coastal Plan – addendum to KASM submission

KASM has made a submission (55) to the Proposed Coastal Plan and represents a relevant aspect of public interest. We would like to make this addendum to our submission.

KASM supports the submissions of:

1. Submitter 58 – Te Atiawa,
2. Submitter 61 – Te Rūnanga o Ngāti Ruanui Trust,

--- in particular in seeking changes to Rule 26 of the draft coastal plan to read:

Amend Rule 26 by amending the Activity Classification to make exploration or appraisal of well drilling a Discretionary Activity (rather than a Controlled Activity)

KASM Relief sought:

Amend Rule 26 by amending the Activity Classification to make exploration or appraisal of well drilling a Discretionary Activity (rather than a Controlled Activity)

We wish to be heard in support of this submission.



Cindy Baxter
Chairperson of KASM
cindybax@gmail.com - 021 772 661

FONTERRA LIMITED

PROPOSED COASTAL PLAN FOR TARANAKI FURTHER SUBMISSIONS

To: Taranaki Regional Council
Via email: coastal@trc.govt.nz

SUBMITTER: FONTERRA LIMITED

Contact: Brigid Buckley

Address for Service: **Fonterra Limited**
C/- Russell McVeagh
48 Shortland Street
PO Box 8 / DX CX10085
AUCKLAND
Attn: Rachel Robilliard

T +64 9 367 8000
E rachel.robilliard@russellmcveagh.com

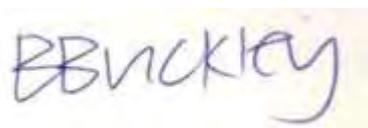
Fonterra wishes to be heard in support of this submission.

I confirm that I am authorised on behalf of Fonterra Limited to make this submission.

1. Fonterra Limited (Fonterra) is a person who has an interest in the Proposed Coastal Plan for Taranaki (Proposed Plan) that is greater than the interest of the general public. Fonterra has significant assets and operational interests within the Taranaki region, including its Whareroa Dairy Manufacturing Site.
2. Fonterra made submissions on the Proposed Plan, listed as Submission 47. The attached schedule sets out Fonterra's further submissions in respect of submission points made by other parties (attached as **Annexure A**).
3. For the original submissions that Fonterra supports, Fonterra considers that those submissions should be allowed as they:
 - promote sustainable management of the region's resources;

- enable the social, economic and cultural wellbeing of the community of the Taranaki Region;
 - achieve the integrated management of the effects of the use, development and protection of air, land and water and associated resources of the Taranaki Region;
 - enable the efficient use and development of Fonterra's assets and operations, and those people and resources which are dependent on, or benefit from, Fonterra's assets and operations;
 - represent the most appropriate means of exercising the Taranaki Regional Council's functions under section 30 of the Resource Management Act 1991 (**RMA**);
 - represent the most appropriate plan provisions under section 32 of the RMA; and
 - are otherwise consistent with the relevant provisions of the RMA, including the purpose and principles of Part 2.
4. For the original submissions that Fonterra opposes, Fonterra considers that those submissions should be disallowed as they:
- will not promote sustainable management of the region's resources;
 - will not enable the social, economic and cultural wellbeing of the community of the Taranaki Region;
 - will not achieve the integrated management of the effects of the use, development and protection of air, land and water and associated resources of the Taranaki Region;
 - will not enable the efficient use and development of Fonterra's assets and operations, and those people and resources which are dependent on, or benefit from, Fonterra's assets and operations;
 - do not represent the most appropriate means of exercising the Taranaki Regional Council's functions under section 30 of the RMA;
 - do not represent the most appropriate plan provisions under section 32 of the RMA; and
 - are otherwise inconsistent with the relevant provisions of the RMA, including the purpose and principles of Part 2.
5. Fonterra wishes to be heard in support of its submission points and would be prepared to consider presenting a joint case with submitters raising similar concerns.
6. I can confirm that copies of this further submission have been served on the person making the original submission.

Dated: 3 August 2018



BRIGID BUCKLEY

National Policy Manager – Global Sustainability and Resources
Fonterra Limited

Names and Addresses for Service of Submitters

SUBMISSION	SUBMITTER NAME	ADDRESS FOR SERVICE
20	Meridian Energy Limited	andrew.feierabend@meridianenergy.co.nz
26	Transpower New Zealand Limited	pauline.whitney@boffamiskell.co.nz
29	Department of Conservation	agray@doc.govt.nz
43	Royal Forest and Bird Protection Society of New Zealand Incorporated	t.kay@forestandbird.org.nz
45	Powerco Limited	mlaurensen@burtonconsultants.co.nz
59	KiwiRail Holdings Limited	rebecca.beals@kiwirail.co.nz

Further Submission Points on the Proposed Coastal Plan for Taranaki

3 August 2018

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PAGE #	SUBMITTER	SECTION	RELIEF SOUGHT	SUPPORT / OPPOSE	REASONS	DECISION SOUGHT
5	Royal Forest and Bird Protection Society	Planning Maps	Seeks that the planning maps are amended to identify the extent of the coastal environment or alternatively identify an indicative extent of the coastal environment.	Support	Fonterra agrees that the identification of the coastal environment on the planning maps will provide greater certainty for activities.	That this submission point be allowed.
9	Transpower Limited NZ	Section 3.1 – Appropriate use and development	Seeks amendment to Section 3.1 to recognise that some activities require a coastal marine location due to their technical, operational or locational constraints.	Support	Fonterra agrees that the Proposed Plan should recognise that there are technical, locational and operational reasons as to why an activity requires a coastal location.	That this submission point be allowed.
13	Transpower Limited NZ	Objective 2	Seeks that the objective is amended to provide for those activities that have a technical, operational or locational need to locate in the coastal environment.	Support	Fonterra agrees that the Proposed Plan should recognise that there are technical, locational and operational reasons as to why an activity requires a coastal location.	That this submission point be allowed.
30	Meridian Energy Limited	Policy 3 – Precautionary approach	Requests that Policy 3 is retained as notified.	Support	For the reasons outlined in Meridian's submission, Fonterra supports the adoption of the precautionary approach where the effects of an activity are uncertain or significant.	That this submission point be allowed.
31	Powerco	Policy 4 – Extent and characteristics of the coastal environment	Delete Policy 4 and refer to a comprehensive map of the coastal environment in its place.	Support in Part	As noted in Fonterra's submission, Fonterra supports the intent of Policy 4 to provide guidance as to how the inland extent of the coastal environment would be determined. However, Fonterra also supports the	This submission point should be allowed in part.

PAGE #	SUBMITTER	SECTION	RELIEF SOUGHT	SUPPORT / OPPOSE	REASONS	DECISION SOUGHT
					proposal to also identify the inland extent of the coastal environment on the planning maps.	
75	Powerco	Policy 37 – Alteration or extensions of existing structures	Requests that Policy 37 is amended to provide for extension and alterations to all existing lawful structures, not just those that are considered major.	Support in Part	Fonterra supports the amended wording, which enables the alteration and extension of all structures, subject to ensuring that the activity will not have significant adverse effects.	That the submission point be allowed.
77	Powerco	Policy 38 – Removal of coastal structures	Requests that Policy 38 is retained as notified.	Support	As outlined in PowerCo's submission the policy appropriately allows for the removal and occupation of structures within the coastal environment and should be retained as notified.	That the submission point be allowed.
112	KiwiRail	Rule 25 – Hard protection structure	Requests that Rule 25 is retained as notified.	Support	Fonterra agrees that this rule should be retained as notified, and considers that the discretionary activity status is appropriate.	That the submission point be allowed.
128	Department of Conservation	Rule 36 – Maintenance, repair, alteration, extension or removal and replacement of existing lawfully established structures	Requests that Rule 36 is retained as notified.	Support	Fonterra agrees that this rule should be retained as notified, and considers that the discretionary activity status is appropriate.	That the submission point be allowed.
159	Royal Forest and Bird Protection Society	Financial Contributions	Requests the retention of the Financial Contributions policies included in the Proposed Plan, and the note that from	Support in Part	Fonterra also supports the inclusion of the note in Section 9 that acknowledges that financial	That the submission point be allowed in part.

PAGE #	SUBMITTER	SECTION	RELIEF SOUGHT	SUPPORT / OPPOSE	REASONS	DECISION SOUGHT
			2022 Councils will no longer be able to require financial contributions under the RMA.		contributions will cease to be allowed under the Resource Management Act from 2022. However, given that the Proposed Plan is not likely to be operative for some time, this section is likely to have limited relevance and application during the life of the Proposed Plan. Fonterra therefore suggests that this section should be removed from the Proposed Plan.	
162	Powerco	Definition – Coastal environment	Requests that the definition of "coastal environment" be amended to mean the area identified in the comprehensive map of the coastal environment, including the natural and physical resources within it, and the atmosphere above it.	Support	Fonterra supports this submission for the reasons outlined in its further submission in support of Powerco's submission on Policy 4 above.	That the submission point be allowed.
174	Powerco	Schedules 1 and 2 – Coastal management areas and areas of outstanding value	Amend the maps in Schedules 1 and 2 by mapping the coastal environment line and to ensure that the extent of the sensitive coastal management areas are appropriate, having regard to existing infrastructure.	Support	Fonterra agrees that identifying the coastal environment on the relevant planning maps in Schedules 1 and 2 will provide clarity and certainty to plan users, and that the extent of the sensitive coastal management areas are appropriate for existing infrastructure.	That the submission point be allowed.

Further submission ends.

Further Submissions Form – Proposed Coastal Plan for Taranaki

Use this form for multiple further submissions on the Proposed Coastal Plan for Taranaki.

Important:

- Further submissions can be made only by a person/organisation representing a relevant aspect of the public interest, or a person/organisation whose interest in the proposal is greater than that of the general public
- Further submissions can only be made in support or opposition of an existing submission and must not raise any new points.
- You are obliged to notify the original submitters to whom your further submissions relate. [Find their email address here](#)

Email your further submissions to coastal@trc.govt.nz with 'Proposed Coastal Plan further submission' in the subject field.

Submissions close at 4pm on Saturday 4 August 2018

Your details

Name: Catherine Cheung Organisation (if applicable): Climate Justice Taranaki Inc. (CJT)

Address: 60 Browne Street, Waitara, 4320

Daytime phone number: 0273636290

Email address: climatejusticetaranaki@riseup.net

Select one status:

I am or represent a person/organisation representing a relevant aspect of the public interest YES/NO

I am or represent a person/organisation whose interest in the proposal is greater than that of the general public YES/NO

Explain why you claim this status: CJT is an active community group with interest on all environmental issues, with particular focus on climate change, its root causes and the social justice issues associated with it. Our core members are all based in Taranaki.

Do you wish to be heard in support of your further submission? YES/NO

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
29 – Department of Conservation	Overall	support	DOC submits that “the plan does not however give effect to the New Zealand Coastal Policy Statement 2010 and is not in accordance with the provisions of Part 2 of the RMA.” This is a critical statement by a specialist authority and must be considered seriously.	Identify the landward extent of the coastal environment and map all areas of significant indigenous biodiversity, as DOC requested.
40-Te Runanga o Ngati Mutunga	Rule 6- Wastewater treatment plant discharges	support	The submitter asked to make all discharge of treated wastewater to the CMA a Prohibited Activity (rather than a Discretionary Activity). This is in line with our submission.	Accept submitter’s request
58- Te Atiawa	Rule 6- Wastewater treatment plant discharges	support	The submitter asked to make all discharge of treated wastewater to the CMA a Prohibited Activity (rather than a Discretionary Activity). This is in line with our submission.	Accept submitter’s request
40-Te Runanga o Ngati Mutunga	Rule 7- Wastewater treatment plant discharges	support	The submitter asked to make all discharges of treated wastewater to the CMA a Prohibited Activity (rather than a Discretionary Activity). This is in line with our submission.	Accept submitter’s request
58- Te Atiawa	Rule 7- Wastewater treatment plant discharges	support	The submitter asked to make all discharges of treated wastewater to the CMA a Prohibited Activity (rather than a Discretionary Activity). This is in line with our submission.	Accept submitter’s request
41 – Te Korowai o Ngāruahine Trust	Rule 8 – Wastewater treatment plant discharges	support	The submitter asked to make all new wastewater discharge in the CMA a Prohibited Activity. This is in line with our submission.	Accept submitter’s request

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
29 – Department of Conservation	Rule 12 – Seismic surveying and bathymetric testing	Largely oppose	<p>In our submission, we argued strongly against seismic testing for petroleum in any CMA. We gave references to evidence that showed harm to marine species and ecosystems from seismic survey and the problems with DOC's Code of Conduct 2013. We therefore cannot support DOC's request to retain rule 12 as 'Permitted'. We noted DOC's request that TRC reconsider this rule if a marine sanctuary is established in the Taranaki coastal environment.</p> <p>BUT there is already a North Island West Coast Marine Mammal Sanctuary within the northern part of Taranaki's CMA. Surely harmful activities such as seismic testing and subsequent mining (either petroleum or mineral) must be banned from any marine mammal sanctuary.</p>	Amend rule 12 to 'prohibited' in all CMA
37 – Petroleum Exploration and Production Association of NZ	Rule 12 – Seismic surveying and bathymetric testing	Oppose	As above	As above
44 – Nga Motu Marine Reserve Society Inc 52 – Emily Bailey	Rule 12 – Seismic surveying and bathymetric testing	Support	As above	As above
43 – Royal Forest and Bird Protection Society 56 – Greenpeace 57 – Kiwis Against Seabed Mining 58 – Te -Atiawa 61 – Te Runanga o Ngati Ruanui Trust	Rule 12 – Seismic surveying and bathymetric testing	Partial support	These submitters all request higher level of regulatory control on seismic surveying	Amend rule 12 to 'prohibited' in all CMA
8 – Silver Fern Farms 46 – Z Energy, BP and Mobil Oil NZ Ltd 47 - Fonterra	Rule 13 – Other discharges	Oppose	We reiterate our concern over such a 'catch-all' rule and our request for such discharges to be publicly notified.	

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
61 – Te Runanga o Ngati Ruanui Trust	Rules 13 & 14 – Other discharges	Support	We support the submitter’s request to include standards/terms/conditions. Such conditions should include banning discharge of any amount of known and emerging contaminants of health and environmental concerns, notably PFAS ^{1, 2, 3} – Per- and Poly-fluorinated alkyl substances used in fire fighting which we mentioned in our original submission.	Amend rule
37 – Petroleum Exploration and Production Association of NZ	Rule 17 – Other discharges to air	Oppose	We disagree with PEPANZ’ request to introduce a new rule to allow “ <i>miscellaneous air emissions... as Permitted Activity</i> ”.	We argue that all emissions from industrial activities, whether intentional or fugitive, should be regulated, monitored and reported on. In regards to flaring, we request that a new condition be introduced to replace open flare pits with enclosed flare systems which are less pollution and harmful to people and the environment.
61 – Te Runanga o Ngati Ruanui Trust	Rule 17 – Other discharges to air	Support	Agree with proposed standards/terms/conditions.	Add standards/terms/conditions.
29 – Department of Conservation 40-Te Runanga o Ngati Mutunga 41 – Te Korowai o Ngāruahine Trust 42 – Ngat Hine Hapu of Te Atiawa 43 – Royal Forest and Bird Protection Society 61 – Te Runanga o Ngati Ruanui Trust	Rule 18 – Outfall structure placement	Support	Agree with proposed amendments	
25 – NZ Petroleum and Minerals 37 - PEPANZ	Rule 26 – Exploration or appraisal of well drilling in the Open Coast or Port	Oppose	We reiterate our requests as per our original submission concerning rules 26-28.	We reiterate our requests as per our original submission concerning rules 26-28.

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
<p>40 – Te Runanga o Ngati Mutunga 41 – Te Korowai o Ngaruahine Trust 42 – Ngati Hine Hapu of Te Atiawa 43 – Royal Forest and Bird 51 – Taranaki Energy Watch 55 – Kiwis Against Seabed Mining 56 - Greenpeace</p>	<p>Rules 26 to 30 – Exploration or appraisal well drilling; Petroleum production installation erection or placement</p>	<p>Support</p>	<p>These submitters’ requests are in line with ours, seeking stronger control over these activities.</p> <p>We reiterate our request for public notification of these activities applications if they are not Prohibited.</p> <p>We are dismayed by Council’s decision to approve Westside’s application to drill a well (up to 3 wells, one of which for deep well injection) under the CMA by directional drilling from the Manutahi-B wellsite, on a non-notified basis. The consent (10545-1.0), valid till 2034, was issued with just two conditions (Officer’s report, 22Feb2018).</p>	<p>Amend rules to give stricter control, including Public Notification; Taranaki Energy Watch’s request for ‘Non-complying’ activity status of this activity in Open Coast, Estuaries Modified and Port CMAs and Prohibited in the Outstanding Vale and Estuaries Unmodified CMAs; and the 6,000 m of set back from the line of mean high water springs proposed by Te Runanga o Ngati Mutunga.</p>
<p>6 – Trans-Tasman Resources Ltd</p>	<p>NEW Rule 26A – Disturbance of seabed by mining</p>	<p>Oppose</p>	<p>While we would agree to introducing a new rule or set of rules that address seabed mining, we strongly oppose to the “Permitted” activity status proposed by TTRL.</p>	<p>See our comment on Rules 60-61.</p>
<p>33 – NZ Defence Force</p>	<p>Rule 31 – Temporary military training</p>	<p>Oppose</p>	<p>We are opposed to the removal of the condition relating to notifying the adjacent territorial authority.</p> <p>We reiterate our original submission point on rules 31 and 32. (See our comments on Rules 13 & 14 also)</p>	
<p>43 – Forest & Bird 57 – Heritage NZ 61 – Te Runanga o Ngati Ruanui Trust 29 - DOC</p>	<p>Rules 31 & 32 – Temporary military training</p>	<p>Partial support</p>	<p>All these submitters request stricter rules and conditions to military training activities.</p> <p>We reiterate our original submission point on rules 31 and 32.</p>	

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
43 – Forest & Bird 29 - DOC 61 – Te Runanga o Ngati Ruanui Trust	Rules 33, 34, 37 and 38	Support	These submitters request more control over the activities. We support their requests.	Amend rules as requested. We also request the removal of the control under rule 37 which specifies no public notification. We argue that public or limited notification would be required in some cases, such as the Westside Kauri E to Kauri A and Shell Pohokura pipeline ruptures and repair work ^{4, 5} .
6 - TTRL	Rule 53 – Minor disturbance and removal	Oppose	We submit that this activity should not be ‘Permitted’, especially in Outstanding Value and Estuaries Unmodified CMAs.	Amend rule
43 – Forest & Bird 61 – Te Runanga o Ngati Ruanui Trust	Rule 53 – Minor disturbance and removal	Support	We support the requests made by the submitters to increase control of this activity in all CMAs, and especially in Outstanding Value and Estuaries Unmodified.	Amend rule
21 – Climate Justice Taranaki 40 – Te Runanga o Ngati Mutunga 58 – Te Atiawa	Rules 60 and 61 – Disturbance, damage or destruction of the foreshore or seabed...	Support	We reiterate our concern over the implications of these rules if applied to seabed mining. Substantial evidence ⁶ has been provided by KASM, Greenpeace, Karen Pratt, Nga Motu Marine Reserve Society and others who have serious concern over TTRL’s application for seabed mining under the EEZ Act. We request that seabed mining be explicitly Prohibited in all CMAs, especially in and near CMAs of Outstanding Value, Estuaries Modified and Unmodified as well as other sites of biodiversity significance, notably Marine Mammal Sanctuaries ^{7, 8} . Submitters 40 and 58 also request stricter control over these activities, making them ‘Non-complying’ in all CMAs.	Amend or introduce specific rules Prohibiting all seabed mining (exploration and mining phases) in all CMAs, due to its transboundary impacts and the scale and unsustainable nature of such activities.
52 – Emily Bailey 61 – Te Runanga o Ngati Ruanui Trust	Schedule 2 – Coastal areas of outstanding value	Support	We support these submitters’ request to include additional sites under Schedule 2, as specified.	Amend Schedule

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
6 - TTRL	Schedule 4A – Significant species and ecosystems Schedule 4B – Sensitive marine benthic habitats	Oppose	We strongly oppose to TTRL's request to delete these two schedules.	Reject TTRL's request
43 – Forest & Bird 29 - DOC	Schedule 4 – Significant indigenous biodiversity Schedule 4A – Significant species and ecosystems	Support	We support these submitters' requests to amend Schedule 4 as specified.	Amend Schedule We further request that the West Coast North Island Marine Mammal Sanctuary ⁹ and any other future Marine Mammal Sanctuaries be recognised and included under Schedule 4. This is crucial for integrated management and in line with NZ's international obligation to protect and restore populations of threatened species under the UNCBD.

¹ https://www.mfe.govt.nz/sites/default/files/media/PFAS-Cabinet%20Paper%20AOG%20national%20programme_26.04.pdf

² <http://www.radionz.co.nz/news/national/360299/foam-investigation-wastewater-discharge-permit-on-hold>

³ <http://www.radionz.co.nz/national/programmes/morningreport/audio/2018655078/toxic-firefighting-foam-victims-speak-out>

⁴ <https://trc.govt.nz/assets/Documents/Meetings/ConsentsRegulatory2018/CR2404.pdf>

⁵ <https://trc.govt.nz/assets/Documents/Meetings/ConsentsRegulatory2018/CR0506.pdf>

⁶ <https://www.epa.govt.nz/database-search/eez-applications/view/EEZ000011?accordion-anchor=Evidence>

⁷ <https://www.stuff.co.nz/environment/105424865/miners-given-access-to-mui-dolphin-sanctuary>

⁸ <http://www.radionz.co.nz/news/te-manu-korihi/361761/iwi-oppose-taranaki-seabed-mining-exploration>

⁹ <https://www.doc.govt.nz/nature/habitats/marine/other-marine-protection/west-coast-north-island/>

Further Submissions Form – Proposed Coastal Plan for Taranaki

Use this form for multiple further submissions on the Proposed Coastal Plan for Taranaki.

Important:

- Further submissions can be made only by a person/organisation representing a relevant aspect of the public interest, or a person/organisation whose interest in the proposal is greater than that of the general public
- Further submissions can only be made in support or opposition of an existing submission and must not raise any new points.
- You are obliged to notify the original submitters to whom your further submissions relate. [Find their email address here](#)

Email your further submissions to coastal@trc.govt.nz with 'Proposed Coastal Plan further submission' in the subject field.

Submissions close at 4pm on Saturday 4 August 2018

Your details

Contact Name: Andrea Kapoutsos (Plan Coordinator)

Organisation (if applicable): **Ministry for Primary Industries**

Address: PO Box 2526, Wellington

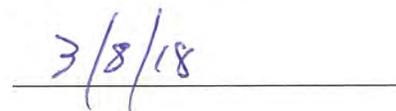
Daytime phone number: 04 894 0316

Email address: rma@mpi.govt.nz

Signature of submitter:



Date:



Dan Bolger (Head of Fisheries New Zealand)

Select one status:

I am or represent a person/organisation representing a relevant aspect of the public interest YES/NO

I am or represent a person/organisation whose interest in the proposal is greater than that of the general public YES/NO

Explain why you claim this status: The Ministry for Primary Industries has responsibility for central government policy relating to fisheries.

Do you wish to be heard in support of your further submission? YES/NO

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
55 - Kiwis Against Seabed Mining	The request for rules that prohibit or restrict fishing activities in relation to areas identified through marine spatial planning.	Oppose	<p>MPI and Fisheries New Zealand consider the Fisheries Act 1996 to be the primary and most effective mechanism to manage the effects of fishing on the aquatic environment.</p> <p>The Fisheries Act provides a range of tools to provide for sustainable utilisation, and decisions on dealing with environmental impacts must be made while regarding relevant costs, benefits and risks. It ensures that potential environmental impacts of fishing are weighed up against benefits derived from fishing, leading to good fisheries management decisions. We also have significant resources dedicated to compliance and enforcement activities.</p> <p>Our preference is therefore to work in partnership with tangata whenua, stakeholders and territorial authorities to understand environmental issues and manage the impacts of fishing under the Fisheries Act.</p>	For the Taranaki Regional Council to reject the request for rules that prohibit or restrict fishing activities.
56 - Greenpeace	The request for rules that prohibit or restrict fishing activities in relation to areas identified through marine spatial planning.	Oppose	<p>MPI and Fisheries New Zealand consider the Fisheries Act 1996 to be the primary and most effective mechanism to manage the effects of fishing on the aquatic environment.</p> <p>The Fisheries Act provides a range of tools to provide for sustainable utilisation, and decisions on dealing with environmental impacts must be made while regarding relevant costs, benefits and risks. It ensures that potential environmental impacts of fishing are weighed up against benefits derived from fishing, leading to good fisheries management decisions. We also have</p>	For the Taranaki Regional Council to reject the request for rules that prohibit or restrict fishing activities.

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
			<p>significant resources dedicated to compliance and enforcement activities.</p> <p>Our preference is therefore to work in partnership with tangata whenua, stakeholders and territorial authorities to understand environmental issues and manage the impacts of fishing under the Fisheries Act.</p>	
<p>28 - Grant Knuckey</p>	<p>The request for rules to maintain, enhance and restore mauri of Wahi Tapu and Wahi Toangta areas.</p>	<p>Oppose in part</p>	<p>MPI and Fisheries New Zealand agree that it is appropriate for wahi tapu to be identified in the Plan. However, we oppose the inclusion of rules that would prohibit the removal, damage or destruction of flora or fauna, where that flora or fauna could otherwise be lawfully harvested under the Fisheries Act.</p> <p>We consider that any restrictions on fishing should be considered under the Fisheries Act, which is the most effective mechanism for managing the effects of fishing on the aquatic environment.</p> <p>The Fisheries Act provides a range of tools to provide for sustainable utilisation, and to give effect to the Treaty of Waitangi (Fisheries Claims) Settlement Act 1992, including through recognising customary fishing rights, management practices and the relationship between tangata whenua and places of food gathering significance.</p> <p>Our preference is therefore to work in partnership with tangata whenua, stakeholders and territorial authorities to understand environmental issues and manage the impacts of fishing under the Fisheries Act.</p>	<p>For the Taranaki Regional Council to reject the request for rules that prohibit or restrict fishing activities.</p>

Further Submissions Form – Proposed Coastal Plan for Taranaki

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Important:

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Email your further submissions to coastal@trc.govt.nz with 'Proposed Coastal Plan further submission' in the subject field.

Submissions close at 4pm on Saturday 4 August 2018

Your details

Name: Louise Tester _____ Organisation (if applicable): Te Korowai o Ngāruahine Trust _____

Address: 147 High Street, Hāwera 4640 _____

Daytime phone number: 06 278 7411/021 165 1549 _____ Email address: policy@ngaruahine.iwi.nz _____

Select one status:

I am or represent a person/organisation whose interest in the proposal is greater than that of the general public YES

Explain why you claim this status:

Te Korowai o Ngāruahine Trust is the mandated post settlement governance entity for Ngāruahine iwi and its hapū Kanihi Umutahi, Ngā Tamaahuroa me Titahi Hapū, Ngāti Haua, Ngāti Manuhiakai, Ngāti Tū and Okahu Inuawai who hold mana whenua status from the Taungatara Stream to the Waingongoro River _____

Do you wish to be heard in support of your further submission? YES

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
39 Maniapoto Māori Trust Board Indigenous biodiversity	Ensure that indigenous biodiversity is maintained and enhanced and protected	Support	With the decimation of indigenous biodiversity that has taken place because of the loss of Māori lands, the future of the eco-system and our environmental, cultural and spiritual wellbeing rests on a greater protection of the indigenous biodiversity – their gifts and qualities	Protection of indigenous biodiversity over economic development considerations
55 – Kiwis against Seabed Mining 55 – Taranaki Energy Watch Petroleum provisions	Adoption of precautionary principles	Support	All environmental decisions should be governed by the principle of first do no harm. A burden of proof must be placed on applicants to demonstrate this	Adoption of precautionary principle as a guiding decision making criteria
51 – Taranaki Energy Watch Petroleum provisions	Introduction of buffer zones	Support	Without buffer zones we cannot adequate offer protection to the marine and coastal environment	Include buffer zones
61 – Ngāti Ruanui Petroleum provisions	Amend plan to reflect governments position regarding off-shore oil and gas permits	Support	Logical to align to the policy	Amend the plan as proposed

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
39 – Ngāti Maniapoto Plan – tangata whenua	Incorporation of Māori narrative	Support	Mātauranga must be afforded equal voice and protection throughout plan	Ensure the plan is balanced throughout and Māori narrative and mātauranga is at the heart of the plan
28 – Grant Knuckey Plan – tangata whenua	Inclusion of co-governance and management Ensure the plan attends to Māori attributes towards the marine and coastal area	Support	Co-governance is a necessity as a treaty partner	Build in co-governance Improve commentary about Māori attributes and relationships
40 – Ngāti Mutunga 50 – Taranaki iwi Plan – tangata whenua	Questioning how affected parties will be identified	Support	Without this clarification, Māori may be left out of the picture	Ensure iwi and hapū are recognised as affected parties throughout the plan
61 – Ngāti Ruanui Plan – tangata whenua	Link cultural areas of significance to past and current activities Integration of mana whenua values into rules	Support	Recognises the changes that have necessarily take place because of land loss and changes in land use. Allows mana whenua to retain their mana and rangatiritanga status and kaitiaki responsibilities for the land and water	Amend as proposes
50 – Taranaki General – surf breaks	Amend the names of the surf breaks – following consultation	Support	As the submitter says, many names are offensive, thus should be changes	Consult with mana whenua about appropriate naming of surf breaks

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
40 – Ngāti Ruanui 58 – Te Atiawa Vision and guiding principles	Incorporate Māori principles and values through plan	Support	Both world views require equal and equitable attention	`Review plan to ensure Māori values are woven throughout
48 – Taranaki District Health Board Vision and guiding principles	Include the Treaty of Waitangi and the principles of the treaty	Support	The omission of this foundation document and details about how the Council will attend to the treaty partnership is remiss	Amend as proposes
50 – Taranaki iwi Environmental Management Plans	Introduce a new 2.6 to address Environmental Management Plans	Support	It is important that the Iwi Plans are afforded proper attention and respect and thus should be reflected in the plan	Amend as proposes
7 – Waikato Regional Council Coastal environment	Amend 3.1 and policy 2 to show that activities outside of CMA influence the CMA	Support	Very logical assessment and recognises wider effects and impacts	Amend as proposed
58 – Te Atiawa S.3.2	Access and activity where cultural values are not adversely impacted on	Support	Cultural and environmental values are inextricable linked and so must be represented as such	Amend as proposes

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
43 – Forest and bird Appropriate use and development	Amend appropriate to efficient	Oppose	Efficiency is not necessarily appropriate	Retain provision as drafted
47 – Fonterra Appropriate use and development	Provide for regionally important industry	Oppose	All industry is important, but cannot give priority to large companies at the expense of the environment	Retain provision as drafted
29 – DoC 47 – Fonterra Water quality	Improve degraded water quality	Support	It is no longer good enough to accept that deterioration has taken place, it is our obligation to take an intergenerational approach and restore our natural environment	Amend as proposes
61 – Ngāti Ruanui Water quality	Maintain and enhance mauri values	Support	Recognises the intrinsic qualities of the water	Amend as proposed
43 – Forest and Bird Indigenous biodiversity	Protect indigenous biodiversity	Support	Indigenous biodiversity is essential to the overall health and quality of the coastal and marine area	Amend as proposed

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
61 – Ngāti Ruanui Public use and enjoyment	Protect cultural and historic heritage from inappropriate use and development	Support	Recognises and value all heritage, not just European	Amend as proposes
47 – Fonterra Public use and enjoyment	Amend to 'where appropriate'	Oppose	This is open to too much interpretation	Retain as drafted
57 – Heritage NZ Preamble	Recognition of Māori relationship	Support	It is a way to further respect and understanding about the Māori relationship to the coastal environment	Amend as proposed
29 – DoC CMA	Amend to include provision of habitats for marine species	Support	This is a fundamental characteristic and must be provided for	Amend as proposes
40 – Ngāti Ruanui 58 – Te Atiawa CMA	Recognition of Mahinga kai (policy 1b and c)	Support	Essential that Māori are able to continue with their customary practices	Amend as proposed

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
61 – Ngāti Ruanui CMA – Estuaries modified	Provide for taonga species, cultural and traditional associations and heritage	Support	Important to recognise and value all customary practice and native species	Amend as proposed
40 – Ngāti Mutunga Integrated management – policy 2	Amend negative to adverse	Support	Is a broader word that requires more consideration about effects – it is less limiting	Amend as proposed
43 – Forest and Bird Integrated Management	Recognise significant biodiversity	Support	Important to protect native species	Amend as proposed
2 – Federated Farmers Policy 6	Recognise and provide for farming activities of regional importance	Oppose	Wrong to focus on a particular industry that may secure advantage over the environment and other sectors	Retain as drafted
40 – Ngāti Ruanui Natural character and natural features	Differentiate between natural character and natural features	Support	The proposed amendment recognises and attends to a better understanding of Te Ao Māori and the holistic relationship to heaven and earth	Amend as proposes

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
61 – Ngāti Ruanui Coastal water quality Policy 11 and policy 12	Recognition of mauri values	Support	Important to take a broader approach to the health of the waters	Amend as proposes
40 – Ngāti Mutunga 58 – Te Atiawa 60 – Ngā Rauru Indigenous species	Protecting taonga species and recognising the role of tangata whenua as kaitiaki	Support	Important to recognise the value of taonga species and Māori obligations and relationship to the environment	Amend as proposes
58 – Te Atiawa Historic Heritage	Use of evidence supplied by tangata whenua	Support	This is an important recognition of mātauranga, historic knowledge and	
61 – Ngāti Ruanui Policy 15 – Historic Heritage	Various amendments to the policy	Support	Amendments provide for more effective protection for tangata whenua	Amend as proposed
6 – Trans Tasman Policy 16 – tangata whenua	Changes to assess cultural and other impacts	Oppose	It is not the duty of the applicant to assess – only tangata whenua can do this, and the policy is about tangata whenua not wider historic heritage matters	Retain as drafted

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
40 – Ngāti Mutunga Policy 16 – Tangata whenua	A range of amendments	Support	The amendments strengthen the mana motuhake of iwi and hapū and should be supported	Amend as proposed
57 – Heritage NZ	Inclusion of kaitiaki agreement	Support	This is a welcome addition	Amend as proposed
58 – Te Atiawa Policy 16 – tangata whenua	Involve iwi and hapū in decision making Consideration of iwi/hapū plans Monitoring and conditions	Support	In a treaty partnership it is right that both parties are engaged in decision making, particularly where tangata whenua interests are affected. The proposals improve the ability for iwi and hapū to be effective kaitiaki	Amend as proposed
60 – Nga Rauru Policy 16 – tangata whenua	Use of iwi appointed experts Recognition of mātauranga	Support	Makes sense for iwi to engage their experts who can articulate their world view	Amend as proposed
61 – Ngāti Ruanui	Inclusion of other iwi agreements Broadening of engagement processes	Support	It is essential that the plan provisions guarantee iwi and hapū involvement	Amend as proposed

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
2 – Federated Famers	Access based on demand Provision of security	Oppose	Demand is a subjective measure I am not sure the council should ensure security exists for lawfully established activities – this is not a public good consideration	Retain as drafted
52 – Emily Bailey Public access	Restrict public access to cultural sites	Agree	The sensitive, historic, spiritual and environmental significance of such sites warrants protection	Amend as proposed
61 – Ngāti Ruanui Policy 18 – public amenity	Avoid adverse effects of habitats with taonga species	Support	It is important to protect indigenous and significant species from harm	Amend as proposed.
51 – Taranaki Energy Watch Policy 22 – discharge to water	Adopt the precautionary approach	Support	We should first aim to do no harm and if we cannot prove this, the activity should not take place	Amend as proposed
60 – Ngā Rauru Policy 22 – discharge to water	Include Māori values as an acceptable quality	Support	This gives Māori values equal status and validity which is important	Amend as proposed.

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
40 – Ngāti Mutunga 58 – Te Atiawa Policy 24 – discharge of treated wastewater Policy 25 – new discharges	Do not allow discharges of treated wastewater	Support	It is unacceptable to allow even treated wastewater containing human sewerage into the marine environment	Amend as proposed
40 – Ngāti Mutunga 58 – Te Atiawa Policy 27 – discharge of stormwater	Addition of sensitive areas	Support	Important that all adverse effects, potential or actual are mitigated close to sensitive areas	Amend as proposed
9 – Karen Pratt Policy 44- extraction or deposition of material	Not in close proximity to off shore reefs and having regard to sensitive geological features	Support	This provision would further protect our reefs and unique environment	Amend as proposed
61 – Ngāti Ruanui Method 4 – State of the Environment monitoring	Include cultural monitoring	Support	Cultural monitoring has equal validity to other monitoring techniques and should be included	Amend as proposed
50 – Taranaki iwi Method 12 – implement plan	Implementation that does not adversely affect Māori cultural values	Support	This recognises the indivisibility of cultural and economic values	Amend as proposed

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
29 – DoC Methods 13-20	Enforcement of dog control bylaws to protect species	Support	It is important that all agencies work to protect species	Amend as proposed
57 – Historic heritage Method 21- 30	Review and update of schedule 7	Support	It is important that the plan is agile and up to date according to new information	Amend as proposes
42 – Ngāti Hine hapū Method 25 – iwi involvement	Remove word consider in method 25 with a stronger term	Support	It is important that the language facilitates and actively encourages and enables the partnership with iwi and hapū	Amend as proposed
43 – Forest and Bird General rules	Better connection and alignment to NZCPS in relation to avoiding adverse effects	Support	Alignment to a strong national policy statement is important	Amend as proposed
56 – Greenpeace General rules	Amend to ensure that fishing rules adverse effects in line with NZCPS and other rules	Support	Alignment and consistency is important	Amend as proposed

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
61 – Ngāti Ruanui General rules	Engagement of tangata whenua Inclusion of cultural monitoring indicators	Support	Further strengths partnership with iwi and respect for Māori ways of knowing	Amend as proposed
61 – Ngāti Ruanui Rule 2 – stormwater discharges Rule 3 – stormwater discharges Rule 6 – wastewater discharges Rule 7 – wastewater treatment plant discharges Rule 10 – bio-fouling Rule 11 –abrasive blasting Rule 13 and 14 – discharges Rule 17 – discharges to air	Inclusion of new conditions to protect tangata whenua values	Support	In granting these conditions there is greater protection for all	Amend as proposed
58 – Te Atiawa 40 – Ngāti Mutunga Rule 9 – biofouling Rule 12 – seismic testing	Opposition to in water biofouling as a permitted activity	Support	Amendment to a controlled activity offers greater protection	Amend as proposed

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
40 – Ngāti Mutunga 42 – Ngāti Hine 43 – Forest and Bird 44 – Nga Motu Marine Society 56 – Greenpeace 58 – Te Atiawa	Seismic testing as a controlled activity	Support	If this activity is to occur the rules and conditions need to better protect the environment	Amend as proposed
21 – Climate Justice Taranaki Rules 13 and 14	Further clarification regarding catch all rules	Support	Rule is too ambiguous	Provide clarification as proposed
40 – Ngāti Mutunga 42 – Ngāti Hine 58 – Te Atiawa Rule 18 – outfall structure	Opposition to permitted activity status	Support	Discretionary activity status offers greater consideration of the issues and environmental protection	Amend as proposed
61 – Ngāti Ruanui Rule 18 – outfall placement Rule 20 – mooring Rule 21 – navigation aid	Restriction of locations away from cultural sites	Support	Offers greater protection	Amend as proposed

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
43 – Forest and Bird Rule 22 – Network utility	Additional matters for consideration	Support	It is important that we offer as great a protection as we can	Amend as proposed
61 – Ngāti Ruanui Rule 22 – Network utility	Protection of cultural sites of significance and processes to include tangata whenua plans and voice	Support	This provision will offer greater cultural (and environmental) protection, thus benefits all	Amend as proposed
61 – Ngāti Ruanui Rule 25 – hard protection structure	Compliance with tangata whenua values and CIA	Support	This provision will offer greater cultural (and environmental) protection, thus benefits all	Amend as proposed
43 – Forest and Bird Rule 26 exploration	Change to restricted discretionary and include indigenous biodiversity and natural character	Support	Offers greater environmental protection for all	Amend as proposed
6 – TTR 26A – Disturbance of sea bed	Allow a range of disturbances as a permitted activity	Oppose	This removes protection for the environment	No relief

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
51 – Taranaki Energy Watch 55 – Kiwis against sea bed mining 56 – Greenpeace Rules 26 – 30 Exploration or appraisal in open coast and post	Amend activity status and incorporate further protection into rules	Support	It is important that activities are subjective to rigorous assessment and rules	Amend as proposed
55 – Te Atiawa Rule 27 – exploration and appraisal	Prohibit drilling above and below sites listed in schedule 5	Support	This proposal recognises the breadth of impact that can occur around drilling	Amend as proposed
61 – Ngāti Ruanui Rule 27 - Exploration and appraisal Rule 28 – Exploration Rule 29 – petroleum production installation Rule 30 – petroleum production installation	Protection of mana whenua values	Support	Begins to give equal status to Te Ao Māori matters of significance	Amend as proposed
21 – Climate Change Rules 29 and 30 – petroleum production installation	Introduction of buffer distances	Support	Buffers offer greater environmental protection to species, habitats and broader eco-system	Amend as proposed

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
42 – Ngāti Hine Rule 31 – temporary military training	Change activity status to controlled	Support	Makes sense to have conditions that have to be met	Amend as proposed
61 – Ngāti Ruanui Rule 31 – temporary military training	Protection of mana whenua values	Support	Inclusion of these matters as conditions makes sense for the environment	Amend as proposed
61 – Ngāti Ruanui Rule 33 – structures Rule 34 – structures Rule 37 – structures	Protection of mana whenua values	Support	Recognises the importance of protection cultural and environmental values together	Amend as proposed
21 – Climate Justice Rule 38 – existing structures	Amend activity status to discretionary	Support	Offers greater protection, engagement and the setting of broader conditions	Amend as proposed
61 – Ngāti Ruanui Rule 38 – existing structures Rule 42 – other structure repair Rule 43 – other	Protection of mana whenua values	Support	Recognises the importance of protection cultural and environmental values together	Amend as proposed

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
structure repair Rule 44 – structure removal				
61 – Ngāti Ruanui Rule 45 - Structure removal or demolition Rule 46 – Structure removal or demolition	Inclusion of conditions to protect mana whenua values	Support	Offers greater level of environmental and cultural protection	Amend as proposed
61 – Ngāti Ruanui Rule 49 - Continued occupation Rule 50 – continued occupation	Inclusion of conditions to protect mana whenua values	Support	Offers greater level of environmental and cultural protection	Amend as proposed
40 – Ngāti Mutunga 58 – Te Atiawa 61 – Ngāti Ruanui Rule 51 – clearance of culverts	Ensure activity does not cause adverse effects on significant sites or key species	Support	Offers greater level of environmental and cultural protection	Amend as proposed and include taonga species
40 – Ngāti Mutunga 58 – Te Atiawa 54 – Nga Rauru 61 – Ngāti Ruanui	Protection against the burying of dead animals in close proximity to sites of significance	Support	Offers greater level of environmental and cultural protection	Amend as proposed

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
58 – Te Atiawa 61 – Ngāti Ruanui Rule 56 – Dredging	Protection of sites of significance and key species	Support	Offers greater level of environmental and cultural protection	Amend as proposed and include taonga species
40 – Ngāti Mutunga Rule 57 – Beach replenishment	Ensure that the activity does not adversely impact species in Schedule 4A	Support	Offers greater environmental protection	Amend as proposed
40 – Ngāti Mutunga 43 – Forest and Bird Rule 65 – Taking or use of water, heat or energy	Limiting the uses so as to avoid adverse impacts	Support	There needs to be limits to the rate of resource exploitation	Amend as proposed
61 – Ngāti Ruanui Rule 65 – Taking or use of water, heat or energy	Ensuring that the activity does not have adverse effects on cultural and customary values	Support	Offers greater environmental and cultural protection	Amend as proposed
60 – Nga Rauru Section 9.1.3, 9.1.5 and 9.1.6 – financial contributions	Include ability to improve kaitiakitanga	Support	Important to recognise the importance of kaitiakitanga in environmental compensations	Amend as proposed

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
60 – Nga Rauru 9.2.1 matters to be considered	Clarification about cultural effects	Support	Agree that further clarity is needed	Provide clarification
50 – Taranaki iwi Section 10.1 – monitoring	Development of a Te Ao Māori monitoring regime in partnership with Māori	Support	The recognition of the important contribution that te Ao Māori brings to the protection and restoration of the environment should sit at the heart of this plan	Amend as proposed
28 – Grant Knuckey Schedule 1 – CMA	Include wāhi tapu and wāhi taonga areas	Support	This is a matter of importance and worthy of further dialogue	Further dialogue with all iwi and hapū
6 – TTR Schedule 4 – sensitive marine benthic habitats	Delete schedule 4	Oppose	It is unclear what environmental protection this would bring	No relief
61 – Ngāti Ruanui Schedule 4C – Taonga	Inclusion of a new schedule for recognised taonga species	Support	The inclusion of taonga species requires more discussion with all iwi as not all iwi had them included in their settlements	Further dialogue with all iwi

Further Submission on the Proposed Coastal Plan for Taranaki

Clauses 8 and 8A of First Schedule, Resource Management Act 1991

To: Taranaki Regional Council
Address: Private Bag 713
Stratford
Taranaki 4352
coastal@trc.govt.nz

Submitter: New Zealand Defence Force
Contact Person: Rebecca Davies, Senior Environmental Officer

Address for Service: New Zealand Defence Force
C/- Tonkin + Taylor
PO Box 2083
Wellington 6140

Phone: +64 21 445 482
Email: rebecca.davies@nzdf.mil.nz

A detailed further submission is attached.

The New Zealand Defence Force (NZDF) represents a relevant aspect of the public interest¹, and also has an interest in the Proposed Coastal Plan for Taranaki that is greater than the interest held by the general public.

NZDF **does** wish to be heard in support of its further submission.

If others make a similar further submission, NZDF **will consider** presenting a joint case with them at the hearing.

A copy of this further submission has been sent to each person who made the original submission.



pp

Date: 3 August 2018

Person authorised to sign
on behalf of New Zealand Defence Force

¹ Set out in section 5 of the Defence Act 1990

#	Original Submitter's Name and Address	Sub Number	Support or Oppose	Section Reference and Summary of Submission	Reason	Decision Sought
Temporary Military Training Activities (TMTAs)						
1	Department of Conservation	29	Oppose in part	Rule 31 Amend the rule to exclude its application to Estuaries Unmodified coastal management area	<p>NZDF is required to maintain its operational capacity in order to fulfil its obligations under the Defence Act 1990. This necessitates undertaking TMTAs in a variety of environments across New Zealand, and NZDF therefore generally seeks enabling provisions in all zones in a District or Regional Plan.</p> <p>DOC's submission point makes reference to a specific concern about the adverse effects associated with the operation of military vehicles within unmodified estuarine areas. It should be noted that TMTAs can encompass a wide range of activities, often including those with effects that are unlikely to be of particular note when compared alongside 'regular' day-to-day activities.</p> <p>NZDF considers that any adverse effects associated with TMTAs in those coastal management areas identified, including the Estuaries Unmodified area, can be appropriately mitigated by the permitted activity standards of Rule 31 (subject to those amendments sought in NZDF's original submission).</p> <p>NZDF therefore consider it appropriate to retain the Estuaries Unmodified coastal management area within Rule 31.</p>	Reject the relief sought by the submitter
2	Te Korowai o Ngāruahine Trust	41	Support	Rule 31 Amend condition (j) of Rule 31 to read: (j) activity does not have an adverse effect on the values associated with historic heritage identified in Schedule 5 <u>A and B</u> Historic heritage;...	<p>Given the broad drafting NZDF considers that condition (j), as notified, inherently captures both Schedules 5A and 5B.</p> <p>NZDF is therefore of the view that the proposed amendment to condition (j) does not change the underlying meaning of the provision, and therefore that the changes would not unduly restrict the majority of TMTA within the coastal area.</p>	Support the amendment to the proposed provision, on the understanding that this does not change the application of the provision as notified.
3	Ngati Hine Hapū of Te Atiawa	42	Oppose	Rule 31 Amend Rule 31 to make temporary military training a Controlled Activity (rather than a Permitted Activity), and that there be iwi / hapu consultation in all cases	<p>NZDF opposes this proposed amendment, as per the points raised in its original submission.</p> <p>The majority of TMTAs are small-scale activities of short duration with very limited effects. Requiring resource consent for all TMTAs would be overly onerous and cannot be supported by reference to an effects-based approach. NZDF considers that any adverse effects associated with TMTAs can be appropriately mitigated by the permitted activity standards of Rule 31. In particular, as relevant to this submission:</p> <ol style="list-style-type: none"> 1.) Rule 31 as notified contains a note (Note 1) that states that "Iwi authorities that have requested to be informed of this activity will be advised by Council". This is considered sufficient to address those concerns raised relating to iwi / hapu consultation. 2.) Permitted Activity standard (j) requires that TMTA activities do not have an adverse effect on the values associated with historic heritage identified in Schedule 5. NZDF considers that the drafting of this 	Reject the relief sought by the submitter

#	Original Submitter's Name and Address	Sub Number	Support or Oppose	Section Reference and Summary of Submission	Reason	Decision Sought
					<p>standard captures those sites with historic heritage values identified in Schedule 5B.</p> <p>3.) Other permitted activity standards ensure effects are less than minor e.g. limited occupation period (a), no permanent structures (b), no adverse effect on highly valued ecosystems or significant indigenous biodiversity (k).</p>	
4	Royal Forest and Bird Protection Society	43	Oppose	<p>Rule 31</p> <p>Amend Rule 31 by deleting the Estuaries Unmodified and Estuaries Modified coastal management areas from the rules</p>	<p>NZDF is required to maintain its operational capacity in order to fulfil its obligations under the Defence Act 1990. This necessitates undertaking TMTAs in a variety of environments across New Zealand, and NZDF therefore generally seeks enabling provisions in all zones in a District or Regional Plan.</p> <p>Forest and Bird's submission point makes reference to a specific concern about the adverse effects upon important habitats to indigenous species within both modified and unmodified estuarine areas.</p> <p>NZDF considers that any adverse effects associated with TMTAs in those coastal management areas, including the Estuaries Modified and Unmodified areas, can be appropriately mitigated by the permitted activity standards of Rule 31 (subject to those amendments sought in NZDF's original submission). In particular NZDF considers that Forest and Bird's concerns regarding effects upon indigenous biodiversity are appropriately captured by Permitted Activity standard (k) in Rule 31 (as notified). In any case, NZDF notes that TMTA are typically small-scale activities of short duration with very limited effects.</p>	Reject the relief sought by the submitter
5	Royal Forest and Bird Protection Society	43	Oppose	<p>Rule 31</p> <p>Amend Rule 31 by adding a standard/term/condition that noise and vibration must only be from normal operation of marine vessels and does not include any seismic testing, explosions, artillery or sonar.</p>	<p>NZDF notes that explosions are already exempt from Rule 31 under the current drafting.</p> <p>NZDF opposes the proposed amendment. Please refer to NZDF's original submission for a further explanation of those matters relating to noise and vibration.</p>	Reject the relief sought by the submitter
6	Heritage New Zealand	57	Oppose	<p>Rule 31</p> <p>Amend the standards / terms / conditions of Rule 31(j) to read:</p> <p>(j) activity does not have an adverse effect on the value associated with historic heritage identified in Schedule 5 [Historic Heritage]; <u>and structures and activities are not to be placed at any site identified in Schedule 5;</u> and [...]</p>	<p>NZDF considers that the concerns raised by Heritage NZ regarding the potential for adverse effects upon historic heritage are appropriately addressed by Permitted Activity standard (j) of Rule 31.</p>	Reject the relief sought by the submitter
7	Te Rūnanga o Ngāti Ruanui Trust	61	Oppose in part	<p>Rule 31</p> <p>Amend Rule 31 to include new or amended standards/terms/conditions to read:</p> <p>[...]</p> <p>(j) activity does not have an adverse effect on the values associated with</p>	<p>In relation to each of these points individually:</p> <p>(j) Consistent cross references to Schedule 5A and 5B is required. Schedule 5B identifies "access" to certain sites of significance as an associated value in some instances. The undertaking of TMTAs may require the temporary exclusion of non-defence personnel</p>	<p>Accept relief (l) proposed by the submitter.</p> <p>Reject relief (j), (k), (m) and (n) sought by the submitter</p>

#	Original Submitter's Name and Address	Sub Number	Support or Oppose	Section Reference and Summary of Submission	Reason	Decision Sought
				<p><u>cultural and</u> historic heritage identified in Schedule 5 [<u>Cultural and</u> Historic heritage];</p> <p><u>(k) activity and discharge does not have adverse effect on Schedules 1 and 2.</u></p> <p><u>(l) activity and discharge does not adversely affect the suitability of the receiving water for customary use;</u></p> <p><u>(m) the activity does not have any adverse effect on any site identified in 5B [Sites of significance to Māori and associated values] and Appendix 2;</u></p> <p>(n) activity does not have an adverse effect on any threatened or at risk, or regionally distinctive species, or any rare and uncommon ecosystem type including those identified in Schedule 4A [Significant indigenous biodiversity] <u>and taonga species protected under Taranaki iwi Deed of Settlement including those identified in Schedule 4C [Taonga species and habitat].</u></p>	<p>for Health and Safety purposes. The inclusion of "Cultural heritage" in 32 (b) could therefore trigger the need for resource consent under Rule 32, in events where access will be temporarily restricted.</p> <p>(k) NZDF is of the view that this proposed standard is too broadly drafted. Schedules 1 and 2 identify all 5 of the proposed coastal management areas, and this proposed standard therefore restricts the ability to undertake any activity or associated discharge with any degree of adverse effect, regardless of the scale and significance of that effect. This could undermine the intent of the Permitted Activity status by requiring all TMTAs to receive resource consent under Rule 32.</p> <p>(l) NZDF considers that the proposed amendment to condition (l) may be appropriate to avoid effects on the suitability of water for customary use and would not unduly restrict the majority of TMTA.</p> <p>(m) As per those comments in (j) above</p> <p>(n) NZDF note that there does not appear to be a Schedule 4C in the Proposed Coastal Plan.</p>	
8	Climate Justice Taranaki	21	Oppose	<p>Rules 31 and 32</p> <p>Oppose Rules 31 and 32 providing for temporary military training</p>	<p>NZDF oppose this proposed amendment, as per the points raised in its original submission.</p> <p>NZDF is required to maintain its operational capacity in order to fulfil its obligations under the Defence Act 1990. This necessitates undertaking TMTAs in differing environments across New Zealand.</p> <p>It should be noted that TMTAs encompass a wide range of activities, including those with effects that are unlikely to be of particular note when compared alongside day-to-day activities. As such we consider that a rule regime with specific Permitted and Controlled Activity rules for TMTAs, subject to appropriate standards, is an effective planning mechanism that will provide NZDF with the ability to undertake TMTAs whilst also mitigating the potential for adverse effects.</p>	Reject the relief sought by the submitter
9	Surfbreak Protection Society	15	Support in part	<p>The submission seeks that there be no impact to surf breaks as a result of TMTAs, and the key surfing and representative groups be part of any limited notification for discharge or disturbance consent applications with the potential to impact on surf breaks or coastal water</p>	<p>The majority of TMTAs are small-scale activities of short duration with very limited effects. The permitted activity conditions preclude permanent structures. The nature of TMTAs means there is no potential for effects on a surfbreak.</p> <p>NZDF notes that Rule 32 already reserves council control over the effects of TMTAs on surf breaks.</p>	Acknowledge that the relief sought by this submitter is already provided for under the plan as notified.
10	Department of Conservation	29	Support in part	<p>Amend Rule 32 by:</p> <ul style="list-style-type: none"> excluding its application to Estuaries Unmodified coastal management 	<p>NZDF agrees with DOC's point that the advice note included in proposed Rule 32 appears to incorrectly refer back to itself. We therefore support the amendment to the advice note</p>	Accept the proposed amendment to the advice note (subject to submission)

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				<p>area</p> <ul style="list-style-type: none"> including a condition after (c) that reads: <u>occupation is for a period of no more than three consecutive weeks</u> amending the advice note to: [...] refer to Rule 32 33 and 33 34 [...] 	<p>proposed by the Department of Conservation, referencing Rules 33 and 34 [subject to those matters raised by DOC which have been addressed in point #15 of our further submission below].</p> <p>NZDF opposes the exclusion of the application of the controlled activity rule to Estuaries Unmodified. It is considered that the Controlled Activity standard (c) provide council with an appropriate method of managing the adverse effects of any TMTAs within any Estuaries Unmodified coastal management area.</p> <p>NZDF opposes the imposition of a maximum occupation period under Rule 32. We consider that the matters for control provide council with an appropriate level of control over the effects associated with TMTAs, particularly (a) which reserves control over the location, method, timing and notification of the works.</p>	#15 below) Reject the other relief sought by the submitter.
11	Te Korowai o Ngāruahine Trust	41	Support	<p>Amend Condition (b) of Rule 32 to read:</p> <p>(b) activity does not have an adverse effect on the values associated with historic heritage identified in Schedule 5A and B Historic heritage; [...]</p>	<p>This submission requests that condition (b) is expanded by specifically identifying Schedules 5A and 5B. Schedule 5A identifies those sites with archaeological sites and historic areas, while Schedule 5B identifies those sites of significance to Maori and their associated values. Given the broad drafting NZDF considers that condition (b), as notified, inherently captures both Schedules 5A and 5B.</p> <p>NZDF is of the view that the proposed amendment to condition (b) does not change the underlying meaning of the provision, and therefore that the changes would not unduly restrict the majority of TMTA within the coastal area.</p>	Support the amendment to the proposed provision, on the understanding that this does not change the application of the provision as notified.
12	Royal Forest and Bird Protection Society	43	Oppose	<p>Rule 32</p> <p>Amend Rule 32 to make temporary military training under this rule a Restricted Discretionary Activity (rather than a Controlled Activity).</p>	<p>NZDF opposes this proposed amendment, as per the points raised in its original submission. NZDF also notes the extensive matters of control provide broad scope to manage and mitigate effects.</p>	Reject the relief sought by the submitter
13	Te Rūnanga o Ngāti Ruanui Trust	61	Oppose	<p>Amend Rule 32 to include new or amended standards/terms/conditions to read:</p> <p>(a) activity does not exclude, or effectively exclude, public access from areas of the coastal marine area over 10 ha or from more than 320 m along the length of the foreshore;</p> <p>(b) activity does not have an adverse effect on the values associated with <u>cultural and</u> historic heritage identified in Schedule 5 [<u>Cultural and</u> Historic heritage];</p> <p><u>(c) the discharge does not have adverse effect on Schedules 1 and 2;</u></p> <p><u>(d) the discharge does not have any adverse effect on any site identified in 5B [Sites of significance to Māori and associated values] and Appendix 2;</u></p> <p>(e) activity does not have an adverse effect on any threatened or at risk, or regionally distinctive species, or any rare and uncommon ecosystem type including those identified in Schedule 4A [Significant species and ecosystems]; and taonga species protected under Taranaki iwi Deed of</p>	<p>NZDF has addressed these points individually below:</p> <p>(b) Schedule 5B identifies "access" to certain sites of significance as an associated value in some instances. The undertaking of TMTAs may require the temporary exclusion of non-defence personnel for Health and Safety purposes. The inclusion of "Cultural heritage" in 32 (b) could therefore trigger the need for resource consent as a discretionary activity under Rule 32, in events where access will be temporarily restricted.</p> <p>(c), (d), (f) – (i) The TMTA rules do not relate to the discharge of contaminants. Suggested standards (c) and (d) are inappropriate and unnecessary within the context of rules which relate to temporary structures and temporary occupation.</p> <p>(e) NZDF notes that there does not appear to be a</p>	Reject the relief sought by the submitter

#	Original Submitter's Name and Address	Sub Number	Support or Oppose	Section Reference and Summary of Submission	Reason	Decision Sought
				<p><u>Settlement including those identified in Schedule 4C [Taonga species and habitat]</u></p> <p><u>(f) the discharge does not adversely affect the suitability of the receiving area for customary use</u></p> <p><u>(g) discharge does not adversely affect the matters/values identified for protection by mana whenua in the cultural impact assessment;</u></p> <p><u>(h) discharge complies with tangata whenua indicators referred to in the tangata whenua monitoring plan</u></p> <p><u>(i) discharge is consistent with iwi management plan.</u></p>	Schedule 4C in the Proposed Coastal Plan.	
14	Te Rūnanga o Ngāti Ruanui Trust	61	Oppose	<p>Rule 32</p> <p>Amend the Control/notification column for this rule to read:</p> <p>Control is reserved over:</p> <p>[...]</p> <p>(e) effects on water quality <u>and mauri values;</u></p> <p>[...]</p> <p><u>(m) effects on Cultural Zone (referred to in Spatial Plan);</u></p> <p><u>(n) monitoring (including tangata whenua indicators referred to in the tangata whenua monitoring plan) and information requirements;</u></p> <p>(o) duration of consent; and</p> <p>(p) review of consent conditions.</p> <p>Resource consent applications under this Rule will not be publicly notified but may be limited notified be notified to tangata whenua.</p>	<p>NZDF has addressed these points individually below:</p> <p>(e) The proposed amendment to condition (e) is unlikely to unduly restrict TMTA, however "mauri" is not defined in the notified plan. If this amendment is to be included it should be clear what these Mauri values are.</p> <p>(m) NZDF is of the view that these matters are appropriately captured by the rule as notified, particularly with respect to point (g).</p> <p>(n) NZDF is of the view that these matters are appropriately captured by the rule as notified. Any monitoring and information requirements would be best determined by Council's processing planner on a case-by-case basis.</p> <p>NZDF opposes the requested change to notification requirements, and the subsequent requirement to notify any group as part of all Controlled Activity applications. It is considered that the statement regarding notification, as notified, is an appropriate control.</p>	Reject the relief sought by the submitter.
15	Department of Conservation	29	Support	<p>Proposed new Rule 32A – Temporary Military Training Activities</p> <p>Amend Rule 32 to include a new Discretionary Activity rule that deals with temporary military training activities that do not come within or comply with Rule 31 or Rule 32.</p>	<p>At the moment any TMTA which does not meet the necessary standards gets captured by Proposed Rules 33 and 34 [see further submission point 10 for discussion of the apparent referencing error].</p> <p>Rules 33 and 34 capture the erection and placement of any structure and any associated occupation of the CMCA. There is no catch-all rule for activities which do not meet those standards identified in Rules 31 and 32.</p> <p>NZDF supports the relief sought by the submitter, subject to the specific wording proposed.</p>	Accept the relief sought by the submitter
Infrastructure						
16	Royal Forest and Bird Protection Society	43	Oppose	<p>Objective 3:</p> <p>Amend the Plan by deleting Objective 3:</p> <p>The use and ongoing operation of nationally and regionally important infrastructure and other existing lawfully established activities is protected</p>	NZDF opposes this proposed amendment, as per the points raised in its original submission.	Reject the relief sought by the submitter

#	Original Submitter's Name and Address	Sub Number	Support or Oppose	Section Reference and Summary of Submission	Reason	Decision Sought
				from new or inappropriate use and development in the coastal environment.		
Biofouling						
18	Te Atiawa	58	Oppose	Rule 9 Opposed to permitting in-water cleaning of biofouling in the Port and seek that such activities be considered a Controlled Activity (rather than a Permitted Activity).	NZDF opposes this proposed amendment, as per the points raised in its original submission.	Reject the relief sought by the submitter
19	Te Rūnanga o Ngāti Mutunga	40	Oppose	Rule 9 Amend permitted activity rule for in-water cleaning of biofouling in the Port and make such activities a Controlled Activity (rather than a Permitted Activity).	NZDF opposes this proposed amendment, as per the points raised in its original submission.	Reject the relief sought by the submitter
20	Te Korowai o Ngāruahine Trust	41	Oppose	Rule 10 Amend Rule 10 to make any sampling, scraping and/or cleaning of biofouling in coastal management areas (other than the Port) a Prohibited Activity (rather than a Non-Complying Activity).	NZDF opposes this proposed amendment, as per the points raised in its original submission.	Reject the relief sought by the submitter

FURTHER SUBMISSION ON PROPOSED COASTAL PLAN FOR TARANAKI

Royal Forest & Bird Protection Society of New Zealand Inc. (Forest & Bird)

Address for service:

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Wellington 6140

Attention:

Amelia Geary

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This is a further submission in support of, or in opposition to, submissions on the Proposed Coastal Plan for Taranaki.

Forest & Bird represents relevant aspects of the public interest. Forest & Bird has been around since 1923 and is New Zealand's largest independent conservation organisation with over 80,000 members and supporters.

The key matters of concern to Forest & Bird relate to the protection of ecological values, particularly those associated with native biodiversity, wetlands and the coastal environment. Forest & Bird's strategic plan is for a predator-free New Zealand in which habitat and species loss has been halted and indigenous biodiversity is flourishing by 2040. We are similarly committed to New Zealand becoming carbon neutral. Our Strategic Plan guides our direction and our feedback on how we would like to see Taranaki's coastal area managed into the future.

We could not gain an advantage in trade competition through this submission.

Forest and Bird wishes to be heard in support of this submission.

Submission sent via email to coastal@trc.govt.nz

Who made the original submission point?	Plan provision	Original submission point	Oppose or support?	What are the reasons for your response?	Relief sought?
6 – Trans-Tasman Resources Ltd	Whole submission	All submission points, including the specific points below	Oppose	The amendments sought won't enable the Plan to give effect to the NZCPS and RPS or achieve the purpose and principles of the RMA	Reject the entire submission
6 – Trans-Tasman Resources Ltd	NEW Rule 26A – Disturbance of seabed by mining	<p>Amend Plan to include new rule 26A to explicitly address disturbance of the seabed by drilling, which would read as follows:</p> <p><i>26A Disturbance of seabed by drilling</i></p> <p>Classification: Permitted activity</p> <p>Coastal management areas: Estuaries Unmodified, Estuaries Modified, Open Coast, Port</p> <p>Standards, terms and conditions</p> <p>(a) Drilling is confined to mud, silt, sand, gravel and other fine sediments;</p> <p>(b) drilling does not occur within the Schedule 2 locations or within 200m of the Schedule 2 locations;</p> <p>(c) spacing between drilling locations (other than a re-drill or twinning of a hole) is not less than 0.5 km;</p> <p>(d) recurrent drilling (other than a re-drill or twinning of a hole) at the same location does not occur more frequently than once every two months;</p> <p>(e) the volume of material removed from a drilling location does not exceed 0.3 m³;</p> <p>(f) the area of seabed disturbed at a drilling location does not exceed 3 m²;</p> <p>(g) drilling does not have an adverse effect on the values</p>	Oppose	The amendment sought won't enable the Plan to give effect to the NZCPS and RPS or achieve the purpose and principles of the RMA	Disallow whole submission point

		<p>associated with historic heritage identified in Schedule 5 [Historic heritage];</p> <p>(h) drilling does not have an adverse effect on any threatened or at risk (declining) species, or any rare and uncommon ecosystem type, including those identified in Schedule 4 [Significant indigenous biodiversity] or any reef system; and</p> <p>(i) Taranaki Regional Council is informed of the scale, location and timing of the activity at least five working days before work commences by entering details of the of the activity at www.trc.govt.nz/informcouncil.</p>			
6 – Trans-Tasman Resources Ltd	Definition – Adaptive management	<p>Amend the term “adaptive management” to read: <i>Adaptive management means a structured, iterative process of robust decision making in the face of uncertainty, which includes allowing an activity to commence on a small scale or for a short period so that its effects can be assessed and a decision made about the appropriateness of continuing the activity (with or without amendment) on the basis of those effects with an aim to reducing uncertainty over time via system monitoring. For the purposes of this Plan, the principles underpinning adaptive management include:</i></p> <p>(a) robust baseline monitoring to good baseline information to establish the existing receiving environment;</p> <p>(b) <i>resource consent conditions that require provide for effective monitoring of adverse effects using appropriate indicators; [...]</i></p>	Oppose	The amendment sought does not resolve the inadequacy of this approach and is not consistent with policy direction to avoid certain effects under the NZCPS.	Reject the amendment sought
6 – Trans-Tasman Resources Ltd	Schedule 2 – Coastal areas of outstanding value	<p>Amend Schedule 2 to delete inclusion of the Project Reef (ONC6) as an area of outstanding value, including:</p> <p>☒ the reference to ONC6 and Map-link Map 42 on page 121;</p> <p>☒ the entire ONC6 Project Reef material on page 129; and</p>	Oppose	The amendment sought won’t enable the Plan to give effect to the NZCPS or RPS	Reject the amendment sought

		Map Link Map 42.			
6 – Trans-Tasman Resources Ltd	Schedule 4A – Significant species and ecosystems	Seek that Schedule 4A is deleted in its entirety or amended to remove any non-threatened species and any at risk species other than those which are listed as at risk (declining) under the <i>New Zealand Threat Classification System</i> .	oppose	The amendment sought is inconsistent with the NZCPS	Reject the amendment sought
6 – Trans-Tasman Resources Ltd	Schedule 4B – Sensitive marine benthic habitats	Amend Plan by deleting Schedule 4B in its entirety.	oppose	The amendment sought is inconsistent with the NZCPS	Reject the amendment sought
17 – David Pearce	Schedule 2 – Coastal areas of outstanding value	Seek amendment to boundaries of ONC 8 and ONFL9 [Waitotara] as an area of outstanding value to exclude modified landscape and to align with South Taranaki's Proposed District Plan.	oppose	Modified landscape may still have natural values. While consistency between plans is generally desirable we note that the South Taranaki plan is not yet operative.	Any amendment must be consistent with giving effect to the NZCPS
21 – Climate Justice Taranaki	Rule 6 – Wastewater treatment plant discharges	Oppose allowing existing wastewater discharge that contains human sewage to discharge to the coastal management area after its consent expires. Seek that once existing consents expire, that the activity be a Prohibited Activity in all coastal management areas.	Support	This submission point is appropriate	Allow submission point
21 – Climate Justice Taranaki	Rule 7 – Wastewater treatment plant discharges	Oppose allowing existing wastewater discharge that contains human sewage to discharge to the coastal management area, after its consent expires. Seek that once existing consents expire, that the activity be a Prohibited Activity in all coastal management areas.	Support	This submission point is appropriate	Allow submission point
21 – Climate Justice Taranaki	Rule 8 – Wastewater treatment	Retain rule prohibiting new wastewater discharges in the designated coastal management areas (but seek that the activity be prohibited in the other coastal management	Support	This submission point is appropriate	Allow submission point

	plant discharges	areas as well).			
21 – Climate Justice Taranaki	Rule 10 – Sampling and biofouling	Retain Rule 10 that any discharges from biofoul cleaning into all coastal management areas (excluding the Port) be a Non-complying Activity.	Support	This is consistent with the NZCPS	Allow submission point
26 – Transpower NZ Ltd	NEW Rule 34A – Other structure erection or placement	Amend Plan to include a new Discretionary Activity rule that provides for Regionally Important Infrastructure (or specific to the National Grid) in coastal management areas: Outstanding Value; Estuaries Unmodified and reads as follows: <i>Structure erection or placement associated with Regionally Significant Infrastructure (or the National Grid) and any associated works:</i> <i>(a) occupation of space in the common marine and coastal area and does not come within or comply with Rules 18 to 32.</i>	Oppose	The amendment sought won't enable the Plan to give effect to the NZCPS or RPS	Disallow proposed amendment
26 – Transpower NZ Ltd	NEW Rule 61A – Other disturbance, damage, destruction, removal or deposition associated with Regionally Important Infrastructure	Amend Plan to include a new rule that provides for Regionally Important Infrastructure (or specific to the National Grid) and reads as follows: <i>Rule 61A - Discretionary Activity</i> <i>Coastal management areas: Outstanding Value; Estuaries Unmodified</i> <i>Other disturbance, damage, destruction, removal or deposition associated with Regionally Significant Infrastructure (or the National Grid) and any associated works:</i> <i>(a) removal of sand, shell, shingle or other natural material; or</i> <i>(b) deposition of material in, on or under the foreshore or seabed</i> <i>that does not come within or comply with Rules 51 to 59, or any other Rule in this Plan including the deemed rules in the Resource Management (Marine Pollution) Regulations</i>	Oppose	The amendment sought won't enable the Plan to give effect to the NZCPS or RPS	Disallow proposed amendment

		<i>1998 (Appendix 5).</i>			
26 – Transpower NZ Ltd	NEW definition – Functional need	Amend Plan to include a new definition for “functional need” to read: <u>The locational, operational, practical or technical needs of an activity, including development and upgrades.</u>	oppose	The wording proposed goes beyond locational considerations.	Reject the submission
29 – Department of Conservation	Rule 18 – Outfall structure placement	Remove outstanding value and estuaries unmodified from the coastal management areas of rule 18.	Support	The amendment sought would ensure the Plan gives effect to the NZCPS and RPS	Allow submission point
30 – First Gas Ltd	Schedule 2 – Coastal areas of outstanding value	Seek confirmation that the First Gas Pipeline at the Waitotara River is outside the area of outstanding value as identified on planning maps 38-39. If the existing pipeline corridor is in the area of outstanding value amend Schedule 2 and associated maps to exclude the corridor.	Oppose in part	If the gas line is within the area of outstanding values then the plan should recognise this in the schedule; however excluding the corridor is not appropriate on the basis of an existing activity. New activities must be considered in the context of the area being outstanding.	Clarify schedule
33 – New Zealand Defence Force	Rule 9 – Sampling and biofouling in the Port	Amend Rule 9 to provide for biofouling activities in the Open Coast and Estuaries Modified coastal management areas as a Discretionary Activity (rather than a Non-complying Activity).	Oppose	The amendment sought won’t enable the Plan to give effect to the NZCPS	Reject submission point
45 – Powerco	NEW definition – Functional need	Amend Plan to include a new definition for “functional need” to read: <u>Functional need means a requirement for a proposal or activity to traverse, locate or operate in the coastal environment.</u>	oppose	The wording proposed goes beyond locational considerations.	Reject the submission
45 – Powerco	Definition – Maintenance	Amendment seeks to include replacement	oppose	Replacement should not be defined as maintenance.	Reject the submission

				Replacement needs to be considered separately so that limits can be applied in specific provisions/rules to manage effects.	
46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	Whole submission	All submission points, including the specific points below	Oppose	The amendments sought won't enable the Plan to give effect to the NZCPS and RPS or achieve the purpose and principles of the RMA	Reject the entire submission
46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	Schedules 1 and 2 – Coastal management areas and areas of outstanding value	Amend Schedules 1 and 2 by: <input checked="" type="checkbox"/> mapping the coastal environment line <input checked="" type="checkbox"/> ensuring that the extent of sensitive coastal management areas are appropriate having particular regard to existing infrastructure, particularly the landward edge of Nga Motu and Tapure areas of outstanding value <input checked="" type="checkbox"/> amending the corresponding descriptions of the coastal management areas throughout the Plan to recognise existing infrastructure in these sensitive areas to ensure it can be operated, maintained, and upgraded as appropriate.	oppose	The amendments sought are uncertain. Any provision for "upgrading" needs to consider effects and give effect to the NZCPS.	Reject the amendment sought
47 – Fonterra	NEW definition – Functional need	Amend Plan to include a new definition for "functional need" to read: <u>Functional need means the need for a proposal or activity to traverse, locate or operate in a particular environment because it can only occur in that environment.</u>	support	Functional need must be related to the environment and not the availability of a site. This wording proposed	If the final National Planning Standards do not include a definition for

				is the most similar to the draft National Planning Standards.	Functional need, adopt the definition proposed.
47 – Fonterra	NEW definition – Operational requirement	Amend Plan to include a new definition for “operational requirement” to read: <u>Operational requirement means the requirement for a proposal or activity to traverse, locate or operate in a particular environment because of technical or operational characteristics or constraints.</u>	oppose	The definition is too similar to “Functional need”. The additional matters make the definition uncertain.	Reject the submission
52 – Emily Bailey	Schedule 2 – Coastal areas of outstanding value	Amend Schedule 2 to include the following as areas of outstanding value: <input checked="" type="checkbox"/> Waipapa, Otarāua Road, Waitara <input checked="" type="checkbox"/> the Waitara Reefs, and; <input checked="" type="checkbox"/> the reefs, tauranga kia/waka and urupā in the following 8 fishing reserves along the coast of Taranaki: Tui Raho (Tuhiraroa), Te Whanganui, Ihutangi, Okawa, Te Ikaroa, Tīpoka 55a and 55b, Mataurukuhia, and Te Wairua (Wairoa) (on Waitaha River).	Support	Inclusion of these additional coastal areas of outstanding values is appropriate	Allow proposed amendment
53 – Taranaki Regional Council	Schedule 2 – Coastal areas of outstanding value	Amend Schedule 2 to align the mapping of Outstanding Natural Character Areas with those mapped by the South Taranaki District Council through their district plan review.	Oppose	While consistency between plans is generally desirable we have reservations about the methods used to map Outstanding Natural Character areas by STDC.	Any amendment must be consistent with giving effect to the NZCPS
61 – Te Rūnanga o Ngāti Ruanui Trust	Plan – Petroleum related provisions	Amend the Plan to reflect the government’s decision to cease offering new offshore oil and gas exploration permits and restricted permitting.	Support	This submission point is appropriate	Allow submission point
61 – Te Rūnanga o Ngāti Ruanui Trust	Schedule 2 – Coastal areas	Amend Schedule 2 (and associated planning maps) to include and identify as coastal management areas	Support	Inclusion of these additional coastal areas	Allow proposed

	of outstanding value	Outstanding Value: <input type="checkbox"/> Tangahoe - Hawera – Manutahi Reef system <input type="checkbox"/> Patea Beach <input type="checkbox"/> Patea River Estuary <input type="checkbox"/> Ohawe Beach <input type="checkbox"/> Manawapou Beach <input type="checkbox"/> Waihi Beach.		of outstanding values is appropriate	amendment

Further Submissions Form – Proposed Coastal Plan for Taranaki

Use this form for multiple further submissions on the Proposed Coastal Plan for Taranaki.

Important:

- Further submissions can be made only by a person/organisation representing a relevant aspect of the public interest, or a person/organisation whose interest in the proposal is greater than that of the general public
- Further submissions can only be made in support or opposition of an existing submission and must not raise any new points.
- You are obliged to notify the original submitters to whom your further submissions relate. [Find their email address here](#)

Email your further submissions to coastal@trc.govt.nz with 'Proposed Coastal Plan further submission' in the subject field.

Submissions close at 4pm on Saturday 4 August 2018

Your details

Name: Sera Gibson Organisation (if applicable): Te Kotahitanga o Te Atiawa Trust and Ngā Hapū o Te Atiawa Iwi

Address: 35 Leach Street, New Plymouth 4310

Daytime phone number: 06 758 4685

Email address: sera@teatiawa.iwi.nz

Select one status:

I am or represent a person/organisation whose interest in the proposal is greater than that of the general public YES

Explain why you claim this status:

Te Kotahitanga o Te Atiawa Trust is the mandated post settlement governance entity for Ngā Hapū o Te Atiawa Iwi (Ngāti Rahiri, Otaraua, Manukorihi, Pukerangiora, Puketapu, Ngāti Tawhirikura, Ngāti Te Whiti and Ngāti Tuparikino) who hold mana whenua status from Te Rau o Te Huia to the Herekawe Stream and extending offshore.

Do you wish to be heard in support of your further submission? YES

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
39 Maniapoto Māori Trust Board Indigenous biodiversity	Ensure that indigenous biodiversity is maintained and enhanced and protected	Support	With the decimation of indigenous biodiversity that has taken place because of the loss of Māori lands, the future of the eco-system and our environmental, cultural and spiritual wellbeing rests on a greater protection of the indigenous biodiversity – their gifts and qualities	Protection of indigenous biodiversity over economic development considerations
51 – Taranaki Energy Watch Petroleum provisions	Introduction of buffer zones	Support	Without buffer zones we cannot adequate offer protection to the marine and coastal environment	Include buffer zones
61 – Ngāti Ruanui Petroleum provisions	Amend plan to reflect governments position regarding off-shore oil and gas permits	Support	Logical to align to the policy	Amend the plan as proposed
39 – Ngāti Maniapoto Plan – tangata whenua	Incorporation of Māori narrative	Support	Mātauranga must be afforded equal voice and protection throughout plan	Ensure the plan is balanced throughout and Māori narrative and mātauranga is at the heart of the plan
28 – Grant Knuckey Plan – tangata whenua	Inclusion of co-governance and management Ensure the plan attends to Māori attributes towards the marine and coastal area	Support	Co-governance is a necessity as a treaty partner	Build in co-governance Improve commentary about Māori attributes and relationships

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
40 – Ngāti Mutunga 50 – Taranaki iwi Plan – tangata whenua	Questioning how affected parties will be identified	Support	Without this clarification, Māori may be left out of the picture	Ensure iwi and hapū are recognised as affected parties throughout the plan
61 – Ngāti Ruanui Plan – tangata whenua	Link cultural areas of significance to past and current activities Integration of mana whenua values into rules	Support	Recognises the changes that have necessarily take place because of land loss and changes in land use. Allows mana whenua to retain their mana and rangatiranga status and kaitiaki responsibilities for the land and water	Amend as proposes
50 – Taranaki iwi General – surf breaks	Amend the names of the surf breaks – following consultation	Support	As the submitter says, many names are offensive, thus should be changes	Consult with mana whenua about appropriate naming of surf breaks
61 – Ngāti Ruanui Mana Whenua	Amend to reaffirm continued use and occupation of the coastal environment and its resources	Support	Use and occupation of the coastal environment has not ceased and therefore this statement should reflect this.	Amend as proposes
48 – Taranaki District Health Board Statutory and planning framework	Include the Treaty of Waitangi and the principles of the treaty	Support	The omission of this foundation document and details about how the Council will attend to the treaty partnership is remiss	Amend as proposes

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
41 – Te Korowai o Ngāruahine Trust Marine and Coastal Area (Takutai Moana) Act 2011	Amend to not that iwi of Taranaki have claims before the Crown		It is important to make note of these claims and explain what these statutory acknowledgements will mean for the community.	Amend as proposes
50 – Taranaki iwi Environmental Management Plans	Introduce a new 2.6 to address Environmental Management Plans	Support	It is important that the Iwi Plans are afforded proper attention and respect and thus should be reflected in the plan	Amend as proposes
7 – Waikato Regional Council Coastal environment	Amend 3.1 and policy 2 to show that activities outside of CMA influence the CMA	Support	Very logical assessment and recognises wider effects and impacts	Amend as proposed
41 – Te Korowai o Ngāruahine Trust Coastal Environment	Amend to include Tauranga waka and Statutory Acknowledgements that iwi have in the CMA	Support	It is important to make note of these areas and explain what these statutory acknowledgements mean to promote readers awareness.	Amend as proposes
47 – Fonterra Appropriate use and development	Provide for regionally important industry	Oppose	All industry is important, but cannot give priority to large companies at the expense of the environment	Retain provision as drafted

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
29 – DoC 47 – Fonterra Water quality	Improve degraded water quality	Support	Where we have utilised a resource and deterioration has taken place, it is our obligation to restore it.	Amend as proposes
61 – Ngāti Ruanui Water quality	Include maintenance and enhancement of mauri values	Support	Recognises the intrinsic qualities of the water	Amend as proposed
43 – Forest and Bird Indigenous biodiversity	Protect indigenous biodiversity	Support	Indigenous biodiversity is essential to the overall health and quality of the coastal and marine area	Amend as proposed
47 – Fonterra 59 - KiwiRail Public use and enjoyment	Amend to 'where appropriate'	Oppose	This wording is vague and open to too much interpretation	Retain as notified
57 – Heritage NZ Preamble	Recognition of Māori relationship	Support	It is a way to further respect and understanding about the Māori relationship to the coastal environment	Amend as proposed
61 – Ngāti Ruanui Policies	Integrated Management	Support	The success of this Plan and other legal instruments such as the EEZ Act, and ultimately the protection of our coastal environment, is dependent on integrated management.	Ensure that the sustainable management purpose of the RMA is followed.

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
32 – Port Taranaki Coastal management areas	Effects outside of the Port	Oppose	The Port and its activities, and the potential to contribute to events such as coastal erosion outside the Port area should be noted so any new activity is assessed in terms of these potential risks	Retain as notified
41 – Te Korowai o Ngāruahine Trust CMA	Recognise marine spatial planning and ecosystem based management, kaitiaki plans, Māori values within each CMA	Support	It is important to recognise and transition to spatial planning and ecosystem based management to ensure there are no gaps in our environmental policy framework. It is also important to mention Māori values within each CMA to reaffirm Māori relationship to the coastal environment	Amend as proposed
61 – Ngāti Ruanui CMA – Estuaries modified	Provide for taonga species, cultural and traditional associations and heritage	Support	Important to recognise and value all customary practice and native species	Amend as proposed
7 – Waikato Regional Council Integrated Management	Integrated management and new section for cross boundary related provisions	Support	To ensure integrated management is successful, provisions relating to cross boundary effects with other regional and district councils are included in the Plan.	Include new section for cross boundary effects
20 - Meridian Energy Limited	Amend to focus on plans for Taranaki	Oppose	To ensure integrated management is successful, the reference to 'for Taranaki' should be removed	Retain as notified
6 – Trans-Tasman Resources Ltd Policy 5	Retain reference to renewable energy	Oppose	New Zealand is transitioning towards renewable energy, it is logical to align to these policies	Retain as notified
6 – Trans-Tasman Resources Ltd Policy 5	Alternatives assessment and best practicable option	Oppose	This is best practice and should be the approach to ensure our coastal environment is utilised and developed in a sustainable manner	Retain as notified

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
25 – New Zealand Petroleum and Minerals Policy 5	Amend plan to reflect governments position regarding off-shore oil and gas permits	Oppose	Logical to align to the policy	Retain as notified
2 – Federated Farmers Policy 6	Recognise and provide for farming activities of regional importance	Oppose	Wrong to focus on a particular industry that may secure advantage over the environment and other sectors	Retain as notified
2 – Federated Farmers Policy 8	Protecting areas of outstanding value	Oppose	Important to take a broader approach to protection	Retain as notified
6 – Trans-Tasman Resources Ltd Policy 8	Protecting areas of outstanding value	Oppose	Important to take a broader approach to protection	Retain as notified
41 – Te Korowai o Ngāruahine Trust Policy 8-15	Replace 'significant adverse effects' with 'adverse effects'	Support	The use of the word significant leave it open to interpretation	Amend as proposed
29 – Department of Conservation Policy 9	Protect the natural character, features, and landscapes	Support	Important to take a broader approach to protection	Amend as proposed
6 – Trans-Tasman Resources Ltd Policy 11	Coastal water quality	Oppose	Important to take a broader approach to protection. Instead of maintain <u>or</u> enhance, use maintain <u>and</u> enhance.	Retain as notified
61 – Ngāti Ruanui Coastal water quality Policy 11 and policy 12	Recognition of mauri values	Support	Important to take a broader approach to the health of the waters	Amend as proposes
6 – Trans-Tasman Resources Ltd Policy 13	Coastal air quality	Oppose	Important to take a broader approach to protection. Instead of maintain <u>or</u> enhance, use maintain <u>and</u> enhance.	Retain as notified
6 – Trans-Tasman Resources Ltd Policy 14	Indigenous biodiversity	Oppose	Important to take a broader approach to protection of significant indigenous biodiversity and therefore maintaining reference to 'regionally distinctive' and 'naturally rare' is preferred.	Retain as notified

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
41 – Te Korowai o Ngāruahine Trust Policy 15 – Historic Heritage	Use of evidence supplied by tangata whenua	Support	This is an important recognition of mātauranga, historic knowledge and	Amend as proposed
61 – Ngāti Ruanui Policy 15 – Historic Heritage	Various amendments to the policy	Support	Amendments provide for more effective protection for tangata whenua	Amend as proposed
6 – Trans-Tasman Resources Ltd Policy 16 – Tangata Whenua	Changes to assess cultural and other impacts	Oppose	It is not the duty of the applicant to assess – only tangata whenua can do this, and the policy is about tangata whenua not wider historic heritage matters	Retain as notified
40 – Ngāti Mutunga Policy 16 – Tangata whenua	A range of amendments	Support	The amendments strengthen the mana motuhake of iwi and hapū and should be supported	Amend as proposed
41 – Te Korowai o Ngāruahine Trust Policy 16 – Relationship of tangata whenua	Various amendments to the policy	Support	Amendments further recognise and provide for the relationship of tangata whenua with the coastal environment	Amend as proposed
57 – Heritage NZ	Inclusion of kaitiaki agreement	Support	This is a welcome addition	Amend as proposed
60 – Nga Rauru Policy 16 – tangata whenua	Use of iwi appointed experts Recognition of mātauranga	Support	Makes sense for iwi to engage their experts who can articulate their world view	Amend as proposed

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
61 – Ngāti Ruanui Policy 16 – tangata whenua	Inclusion of other iwi agreements Broadening of engagement processes	Support	It is essential that the plan provisions guarantee iwi and hapū involvement	Amend as proposed
2 – Federated Famers	Access based on where a demand exists	Oppose	Demand is a subjective measure. Ensuring security exists for lawfully established activities is not always in the best interest of the public.	Retain as notified
41 – Te Korowai o Ngāruahine Trust Policy 17 - Public access	Amend to ensure enhancing public access doesn't compromise sites of significance and indigenous biodiversity.	Support	Increased public access should not be at the detriment of sites of significance and indigenous biodiversity.	Amend as proposed
52 – Emily Bailey Policy 17 - Public access	Restrict public access to cultural sites	Support	The sensitive, historic, spiritual and environmental significance of such sites warrants protection	Amend as proposed
20 - Meridian Energy Ltd Policy 18 – Amenity values	Delete reference to historic heritage	Oppose	The amenity values of historic heritage sites warrants protection	Retain as notified
41 – Te Korowai o Ngāruahine Trust Policy 18 – Amenity values	Include references to Schedules 5A and B, 4A	Support	Important to link the policy to the relevant schedules in the plan	Amend as proposed
41 – Te Korowai o Ngāruahine Trust Policy 19 – Surf breaks and Significant Surfing Area	Ensure protection of surf breaks is not incompatible with sites of cultural significance	Support	Sites of cultural significance require appropriate protection from recreational activities such as surfing.	Amend as proposed
60 – Ngā Rauru Policy 22 – discharge to water	Include Māori values as an acceptable quality	Support	This gives Māori values equal status and validity which is important	Amend as proposed

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
41 – Te Korowai o Ngāruahine Trust Policy 24 – Discharge of treated wastewater	Explicitly reference iwi as distinct from general community	Support	Due to the relationship that Māori have with the coastal environment it is important to explicitly mention iwi as being distinct from the general community	Amend as proposed
41 – Te Korowai o Ngāruahine Trust Policy 32 – Placement of structures	Ensure structures are not placed within sites of significance	Support	Important to protect sites of significance from the placement of structures, and reference Schedule 5B to link the policy to the schedule	Amend as proposed
25 - New Zealand Petroleum and Minerals 37 – Petroleum Exploration and Production Association of NZ Policy 38 – Removal of coastal structures	Amend to factor in unreasonable costs and unreasonable risks on human health and safety, and considerations from the International Maritime Organisations 1989 guidelines.	Oppose	<p>Maintain and enhancing our environment is vital to our health and wellbeing. It is not appropriate for costs, health and safety, deterioration of the material and so on, to factor in the assessment of whether or not structures should be removed.</p> <p>Additionally, in lieu of the decommissioning regulations being released the original wording of the policy should be retained.</p>	Retain as notified
41 – Te Korowai o Ngāruahine Trust Policy 38 – Removal of coastal structures	Support the presumption that coastal structure will be removed	Support	Maintain and enhancing our environment is vital to our health and wellbeing and therefore we support the removal of structures	Retain as notified
41 – Te Korowai o Ngāruahine Trust Policy 40 – Disturbance, deposition and extraction in marine protected areas	Inclusion of future marine protected areas	Support	Important for the plan to provide for future marine areas that may also be designated for legal protection	Amend as proposed
6 – Trans-Tasman Resources Ltd Policy 43 – Port Dredging	Allow dredging for ports or nationally significant or regional significant infrastructure, not only for Port Taranaki	Oppose	This is too permissive. It is important to control dredging activities and the associated effects and therefore confining this activity to Port Taranaki where it is required for ongoing operation.	Retain as notified

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
9 – Karen Pratt Policy 44 - Extraction or deposition of material	Not in close proximity to offshore reefs and having regard to sensitive geological features	Support	This provision would further protect our reefs and unique environment	Amend as proposed
41 – Te Korowai o Ngāruahine Trust Policy 44 - Extraction or deposition of material	Exclude areas in Schedules and areas subject to crown applications or settlement under Marine and Coastal Area (Takutai Moana) Act 2011	Support	Important for the plan to protect areas identified in Schedules and areas subject to crown applications	Amend as proposed
41 – Te Korowai o Ngāruahine Trust Method 1 – Advice and information	Include provision for advice and information about the cultural significance and importance of the marine environment to Māori, iwi/hapū	Support	Important to provide for this given the relationship that Māori have with the marine environment	Amend as proposed
41 – Te Korowai o Ngāruahine Trust Method 1 and 2 – Economic instruments and works and service	Delete reference to ‘consider’	Support	Important to provide for these mechanisms as an offset to utilising and potential impacting upon resources within the marine environment	Amend as proposed
61 – Ngāti Ruanui Method 4 – State of the Environment monitoring	Include cultural monitoring	Support	Cultural monitoring has equal validity to other monitoring techniques and should be included	Amend as proposed
50 – Taranaki iwi Method 12 – implement plan	Implementation that does not adversely affect Māori cultural values	Support	This recognises the indivisibility of cultural and economic values	Amend as proposed
29 – DoC Methods 13-20	Enforcement of dog control bylaws to protect species	Support	It is important that all agencies work to protect species	Amend as proposed
57 – Historic heritage Method 21- 30	Review and update of schedule 7	Support	It is important that the plan is agile and up to date according to new information	Amend as proposed

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
41 – Te Korowai o Ngāruahine Trust Method 21 – 31 – Historic heritage	Support implementation of Methods 21-31	Support	Important to implement provisions which are in line with tangata whenua values	Amend as proposed
42 – Ngāti Hine hapū Method 25 – iwi involvement	Remove word consider in Method 25 with a stronger term	Support	It is important that the language facilitates and actively encourages and enables the partnership with iwi and hapū	Amend as proposed
50 – Te Kāhui o Taranaki Trust Method 32 – Resource Consents	Amend so as to not impact adversely on Māori cultural values	Support	Important that public access, use and enjoyment isn't at the detriment of Māori cultural values	Amend as proposed
43 – Forest and Bird General rules	General Rules - Better connection and alignment to NZCPS in relation to avoiding adverse effects	Support	Te Runanga o Ngati Mutunga support the request that the plan has an increased connection and alignment to the NZCPS and note that this is a requirement for all Regional Coastal Plans	Amend as proposed
56 – Greenpeace General rules	Amend to ensure that fishing rules adverse effects in line with NZCPS and other rules	Support	Alignment and consistency with the NZCPS is a requirement for all Regional Coastal Plans	Amend as proposed
61 - Te Rūnanga o Ngāti Ruanui Trust	Rules – General; That monitoring programmes referred to within the rules section include cultural or mauri indicators/values Specifically relating to the following rules: Rule 2 – stormwater discharges Rule 3 – stormwater discharges Rule 6 – wastewater discharges Rule 7 – wastewater treatment plant discharges Rule 10 – bio-fouling Rule 11 –abrasive blasting Rule 13 and 14 – discharges Rule 22 – Network utility Rule 25 – hard protection structure Rule 27 - Exploration and appraisal	Support	The inclusion of cultural or mauri indicators/values in monitoring programmes will provide for a greater level of cultural protection and culturally appropriate monitoring which will significantly add to the ability of this plan to protect the values that are important to Tangata whenua within the CMA This would ensure that any adverse effects on sites of significance to Ngāti Mutunga can be assessed using culturally appropriate methods The addition of these conditions would also strengthen the partnership with iwi and respect for Māori ways of knowing	Amend as proposed

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
	Rule 28 – Exploration Rule 29 – petroleum production Rule 31 – temporary military training Rule 33 – structures Rule 34 – structures Rule 37 – structures Rule 38 – existing structures Rule 42 – other structure repair Rule 43 – other structure repair Rule 44 – structure removal Rule 45 - Structure removal or demolition Rule 46 – Structure removal or Rule 49 - Continued occupation Rule 50 – Continued occupation			
21 – Climate Justice Taranaki Rules 13 and 14	Further clarification regarding catch all rules and ask that if retained that they be publically notified	Support	Te Runanga o Ngati Mutunga supports this submission as we are opposed to any discharge of contaminants into the CMA or other water bodies and if this is to be retained would support the increased participation that public notification of this activity would provide.	Provide clarification as proposed
43 – Royal Forest and Bird Protection Society	Rule 25 – Hard protection structure erection or placement Amend by clarifying the purposes to which erosion control applies	Support	This amendment would provide clarity about the exact purpose of the erosion control that is covered by this rule	Amend as proposed
6 - Trans-Tasman Resources Ltd	NEW Rule 26A – Disturbance of seabed by mining	Oppose	TRONM oppose the inclusion of the new rule as suggested by TTR due to our opposition of sea bed mining. We feel that the addition of this rule would remove the environmental and cultural protections that are provided by the existing rules	Relief be declined
29 – Department of Conservation Rule 37 – Existing lawfully established network structures	Rule 37 – Existing lawfully established network structures Asks that this rule be amended to include a provision about limiting the size of any extension to the structure	Support	Support this amendment as it would provide a clear limit to the size of any extension	Amend as proposed

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
30 – First Gas Ltd Rule 37 – Existing lawfully established network structures	Rule 37 – Repair, alteration and extension of an existing lawfully established network structures Asks that this rule be amended to made this a permitted activity	Oppose	Due to the possible negative environmental effects from this activity Te Rūnanga o Ngāti Mutunga do not support this becoming a permitted activity	Relief be declined
38 - First Gas Ltd Rule 38 – existing structures	Rule 38 – Existing Structures Asks that Network utility pipeline removal and replacement be a permitted activity	Oppose	The possible adverse effects of pipeline removal in any part of the CMA means that this activity should have the protection afforded by it being classed as a Discretionary activity	Relief be declined
21 – Climate Justice Rule 38 – existing structures	Rule 38 – existing structures Amend activity status to discretionary	Support	Offers greater protection, engagement and the setting of broader conditions	Amend as proposed
41 – Te Korowai o Ngāruahine Trust Rule 49 Continued Occupation	Rule 49 Continued Occupation Asks for rule to be amended for this activity to be made a Restricted Discretionary Activity (rather than a permitted activity)	Support	Support this reclassification as it will allow for the continued occupation of the CMA by these structures to be reviewed.	Amend as proposed
41 – Te Korowai o Ngāruahine Trust Rule 52 – Collection of benthic grab samples	Rule 52 – Collection of benthic grab samples Amend to require notification of iwi of any benthic grab sampling authorised by this rule	Support	Support the need for iwi to be notified of this activity	Amend as proposed
61 – Te Rūnanga o Ngāti Ruanui Trust Rule 56 – Dredging	Rule 56 – Dredging Protection of sites of significance and key species	Support	The suggested changes provide for a greater level of environmental and cultural protection and ensures that there is consistency of protection throughout the plan	Amend as proposed
21 - Climate Justice Taranaki	Rules 60 and 61 – Other disturbance, damage, destruction, removal or deposition Amend: Notes concerns that Rules 60 and 61 are silent on seabed mining and seeks that the Plan be amended to make seabed mining a Prohibited activity.	Support	Te Runanga o Ngāti Mutunga opposes seabed mining and would support the clear statement that this is a prohibited activity within all areas of the CMA	Amend as proposed
26 – Transpower NZ Ltd	Inclusion of new rule 61A relating specifically related to Regionally important infrastructure	Seek clarification	Te Runanga o Ngāti Mutunga do not feel that this submission provides enough information to justify the need for a specific rule relating to Regionally Important Infrastructure	Relief not be granted – Ask for additional information or evidence

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
60 – Te Kaahui o Rauru Section 9.1.3, 9.1.5 and 9.1.6 – financial contributions	Asks that these sections include the option of improving Kaitiakitanga	Support	Important to recognise the importance and value of recognising kaitiakitanga in environmental compensations	Amend as proposed
60 – Te Kaahui o Rauru 9.2.1 matters to be considered	Clarification about cultural effects	Support	Agree that further clarification about whether cultural effects are intended to be included under community effects in the matters to be considered.	Provide clarification
41 – Te Korowai o Ngāruahine Trust Section 10.1 – Monitoring	Section 10.1 Amend to include a specific method about engaging in dialogue with iwi in order to understand perceptions and values, and the application of mātauranga Māori.	Support	Te Runanga o Te Rūnanga o Ngāti Mutunga supports the inclusion of Maori values as a focus point for the Councils monitoring. This would ensure that any adverse effects on sites of significance to Te Rūnanga o Ngāti Mutunga and other iwi/hapū can be assessed using a culturally appropriate methods	Amend as proposed
60 Te Kaahui o Rauru Section 10.1 – Monitoring	Section 10.1 – Monitoring Amend Section 10.1 to include Māori values as a focus point in monitoring.	Support	Te Runanga o Te Rūnanga o Ngāti Mutunga supports the inclusion of Maori values as a focus point for the Councils monitoring. This would ensure that any adverse effects on sites of significance to Te Rūnanga o Ngāti Mutunga and other iwi/hapū can be assessed using a culturally appropriate methods	Amend as proposed
50 – Te Kāhui o Taranaki Trust Section 10.1 – monitoring	Section 10.1 monitoring Development of a Te Ao Māori monitoring regime in partnership with Māori	Support	As for above - This would ensure that any adverse effects on sites of significance to Te Rūnanga o Ngāti Mutunga can be assessed using a culturally appropriate methods	Amend as proposed
43 - Royal Forest and Bird Protection Society	Definition – Regionally Important infrastructure	Support	Recognise that the existing definition provides a clear	Support

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
<p>46 - Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd</p> <p>Definition – Reverse sensitivity</p>	<p>Definition – Reverse sensitivity</p> <p>Amend the definition of “reverse sensitivity” to read:</p> <p>Amend the definition of “reverse sensitivity” to read: Reverse sensitivity refers <u>to the potential for the operation of an existing effects of sensitive activities on other lawfully established activities to be constrained or curtailed by the more recent establishment or intensification of other activities which are sensitive to the proposed activity in their vicinity.</u></p>	Oppose	Ngāti Mutunga supports the current definition of reserve sensitivity and feels that this definition already gives adequate protection to existing activities	Relief be Declined
<p>6 - Trans-Tasman Resources Ltd</p> <p>Schedule 2 – Coastal areas of outstanding value</p>	<p>Schedule 2 – Coastal areas of outstanding value</p> <p>Amend Schedule 2 to delete inclusion of the Project Reef (ONC6) as an area of outstanding value, including:</p> <ul style="list-style-type: none"> • the reference to ONC6 and Map-link Map 42 on page 121; • the entire ONC6 Project Reef material on page 129; and • Map Link Map 42 	Oppose	Ngati Mutunga support the inclusion of the Project Reef (ONC6) as an area of outstanding value in recognition of the amount of evidence collected by the South Taranaki Underwater Club showing the biodiversity values of this site	Relief be declined
<p>10 - South Taranaki Underwater Club</p> <p>Schedule 2 Coastal Areas of outstanding Value</p>	<p>Schedule 2 Coastal Areas of outstanding Value Inclusion of Project Reef Site</p>	Support	Ngati Mutunga would like to support the inclusion of this area in the Schedules 2 (Coastal areas of Outstanding Value) in recognition of the amount of evidence that has been gathered by the South Taranaki Underwater club about the biodiversity value of the Project Reef site.	Relief be given
<p>6 - Trans-Tasman Resources Ltd</p> <p>Schedule 4A Significant species and ecosystems</p>	<p>Schedule 4A Significant species and ecosystems</p> <p>‘Seek that Schedule 4A is deleted in its entirety or amended to remove any non-threatened species and any at risk species other than those which are listed as at risk (declining) under the New Zealand Threat Classification System.’</p>	Oppose	The protection of biodiversity which is one of the aims of this plan is best achieved by valuing and protecting all indigenous species and ecosystems not just those that are at risk (declining).	Relief be declined
<p>6 - Trans-Tasman Resources Ltd</p> <p>Schedule 4B – Sensitive marine benthic habitats</p>	<p>Schedule 4B – Sensitive marine benthic habitats</p> <p>‘amend plan by deleting Schedule 4B in its entirety’</p>	Oppose	The schedule allows for the recognition and protection of important marine habitats	Relief be declined

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
<p>(61) Te Rūnanga o Ngāti Ruanui</p> <p>(41) Te Korowai o Ngāruahine Trust</p> <p>(60) Te Kahui o Rauru</p> <p>Schedule 5B</p>	<p>Submitters asked for inclusion of additional sites to Schedule 5B</p>	<p>Support</p>	<p>The inclusion of these additional sites of significance will insure that this plan is able to protect all of the sites that have cultural and historical significance to tangata whenua and will ensure its long term sustainability.</p>	<p>Amend as proposed</p>

Response to submitter Trans-Tasman Resources

Policy 5 (c) **Page 27 of Public Submissions** **Page 5 of TTRL submission**

TTRL suggest an amendment to TRC Coastal Plan Policy 5 (c) stating that an alternative assessment and the need for an activity to be the BPO is not always required, in particular where there are not significant adverse effects.

I would like to respond, by stating the following reasons why Policy 5(c) should remain.

1. Under the RMA s6 (2) * there would appear to be no restriction on the ability for TRC to include Policy 5(c) and thus include the requirement to *have regard to the appropriateness of the proposed design, methodology, whether it is the past practicable option, location or route and any possible alternatives.*
2. Under section 5(j) there is regard to the degree and significance of actual or *potential* adverse effects. Inclusion of Policy 5(c) as it stands would enable a more robust assessment by TRC in applications where there is a degree of uncertainty and *the potential* for adverse effects – despite an assessment that might weight the impacts to be less than significant.
3. An applicant to the TRC would be familiar with the suite of alternatives as part of their Project scope and planning, as well as the costs attached to these alternatives. There may be alternatives that offer an outcome at a greater cost and so are not chosen by the applicant – but may be of interest for the TRC to consider, in order to obtain the best environmental outcome and with still a consideration for the applicant’s budget.
4. Under RMA s(6)(d) a description of alternative methods of discharge (where an activity includes the discharge of a contaminant) is required. In the case of TTRL’s operations there is the discharge of heavy metals, with a degree of uncertainty noted by the scientific expert Vopel in terms of *the impact due to the spatial variations in target iron sand, uncertainty in mass and water balances and effects of the elevated dilute-acid soluble concentrations of nickel and chromium in subseafloor iron sand and the observed trends with depth below the seafloor. A precautionary approach to monitoring conditions should assume elevated bioavailability of these trace metals should this iron sand be exposed by removal of the overlying iron sand or otherwise displaced to the surface of the seafloor.*

This is one example (discharge of contaminant) where there is no limitation to 'significant adverse effects' before requiring a description of an alternative method. As such there is a need for TRC Coastal Plan Policy 5(c) to remain.

6

Information required in assessment of environmental effects

(1)

An assessment of the activity's effects on the environment must include the following information:

(a)

if it is likely that the activity will result in any significant adverse effect on the environment, a description of any possible alternative locations or methods for undertaking the activity:

(d)

if the activity includes the discharge of any contaminant, a description of—

(i)

the nature of the discharge and the sensitivity of the receiving environment to adverse effects; and

(ii)

any possible alternative methods of discharge, including discharge into any other receiving environment:

*(2)

A requirement to include information in the assessment of environmental effects is subject to the provisions of any policy statement or plan.

Extracts above from RMA:

http://www.legislation.govt.nz/act/public/1991/0069/211.0/DLM242008.html?search=sw_096be8ed81785d44_Assessment_25_se&p=1&sr=14

Policy 5 (f) and (g) Page 28 of Public Submissions Page 6 of TTRL submission

TTRL considers these policies should be amended.

1. I would like to respond by stating the following reasons why I consider the policies should remain as worded. The restoration or enhancement of the coastal area from an activity is a factor that needs *express* consideration in Policy 5, so there can be a full assessment of the appropriate use and

development of the coastal environment. Technological developments have the potential to increase the ability of applicants to address Policy 5 (f) and (g) in terms of their project's direct impacts on the environment.

2. TTRL's operations (which have recently been granted by the EPA) has an impact on the seafloor - resulting in pits – the infilling will occur over decades at the smallest water depth (20 m) and over centuries at the greatest water depth (45 m). There will also be mounds and pit migration over the years. Similar depths (20m +) are in the TRC's coastal jurisdiction, and should TTRL/any other mining company apply to mine – the same pits/mound impacts and migrations can be expected.
<https://www.epa.govt.nz/assets/FileAPI/proposal/EEZ000004/Evidence/EEZ000004-16-Malcolm-Green-Pits-and-Mounds.PDF>
3. Extraction of the seabed, in an operation such as TTRL, also results in the elimination of the shell hash, which in parts of the TRC coastal environment has a significant footprint in terms of area and depth to which it occurs.
4. Policy 5(f) and (g) also provides a focus for an applicant to think in a wider sense how they can contribute to enhancement or restoration of an area of the TRC coast and for this to be part of the decision making process.

Policy 8: Areas of outstanding value Page 28 of Public Submissions Page 6 of TTRL submission

TTRL's points are noted. However as recently as June 2018, The NZ Law Society (LawTalk 919) stated that further guidance on this issue is expected, and that until this is available decision makers may well assess an application under both approaches. As such, TTRL's use of the *King Salmon* case, is far from the end of the matter. As such I submit that Policy 8 remains.

Schedules: Schedule 2: Coastal Areas of Outstanding value

TTR's basis for opposing the inclusion of the Project Reef, is that there 'does not appear to be sufficient evidential basis to support such a classification'. They also seek the removal of the Project Reef until there is 'a sufficient evidential basis to warrant the project reef site being classified as an ONC.'

I believe 'sufficient evidence' has been provided to the TRC. The Project team, including myself as one of the Project leads, have provided extensive information to TRC's policy staff and marine scientists. The Project now has many hundreds of data files (acoustic files, in-situ camera video recordings from day and night, observational photographs and video, benthic survey photographs) as well as numerous physical samples of species (sponges, hydroids and bryozoans) from the Project reef which have been formally identified by NIWA scientific experts.

The Project team have shared information with the senior bio-diversity ranger for DOC, who has provided written support and explanation to the TRC, to have the Project Reef recognized in Schedule 2 of the TRC coastal plan.

Scientific methodology for our *diver led benthic surveys* have been developed by marine scientists. The methodology for determining percentage coverage has been robustly reviewed by our current marine scientist - having consulted with external scientists experienced in benthic surveys.

It is worth noting, that as far as I can determine 'Project Reef Life' is the first *and only group* to have conducted *diver led* benthic surveys of South Taranaki offshore reefs – no research or commercial organization have yet to do so.

TTRL have not supplied any scientific basis to warrant the exclusion of the Project Reef from Schedule 2.

In a recent EPA Decision document, the Project Reef was described as an 'ESA/ecologically sensitive area' and included in Schedule 2, as an area to be monitored for sediment environmental limits.

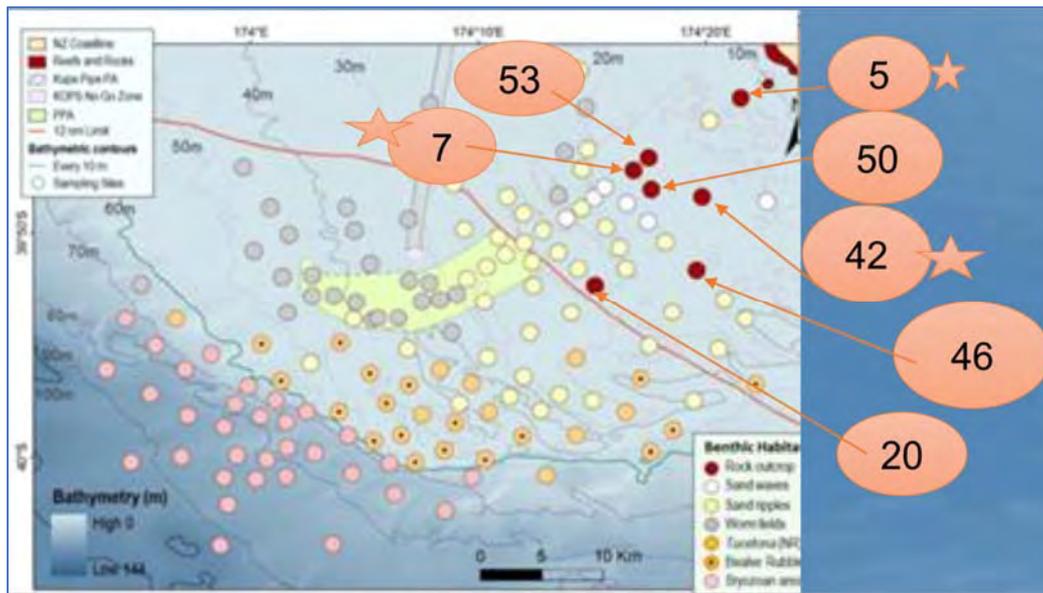
The Project Reef differs greatly in terms of substrate in comparison to 100% of the reefs surveyed by NIWA on contract to TTRL, as part of their recent application to the EPA. A reef of moderate to high relief (as in the case of the Project Reef) provides a stable environment for encrusting organisms and plants, as well as a habitat for a variety of animals.

In TTRL's recently granted application to the EPA they provided scientific evidence of the seafloor - <https://www.epa.govt.nz/assets/FileAPI/proposal/EEZ000011/Applicants-proposal-documents-Application-documents/Report-3-NIWA-Patea-Shoals-Benthic-Ecology-November-2015.pdf> 5% of the 144 sites surveyed were rock outcrop – which were described as only 3.8% hard substrata – as they were 'generally low relief (<30cm in height) and surrounded or partially covered by rippled sands.

Appendix B of the report describes each site of the 144 sites surveyed – and for ease I have included the descriptions all the rock outcrops – which have a commonality in terms of their *shallow relief and sand inundation*.

- Site 5 Rocky outcrop/rippled sands: *low-relief outcrop*
- Site 7 Rocky outcrop/rippled sands: *low-relief bedrock, boulders, cobbles and pebbles partial covered in iron-rich sands with shell-hash*
- Site 20 Rocky outcrop/rippled sands: *low-relief outcrop partially buried by rippled sands, shell debris and gravel/pebbles in troughs, mudstone cobble*
- Site 42 Rocky outcrop/rippled sands: *Low-lying bedrock and cobbles, partially covered in coarse sand with shell-hash, adjacent to linear-rippled sand with shell-hash and gravel/pebbles in troughs. Bedrock with sponges*

- Site 46 Scree field/rippled sand: coarse sands with gravels, pebbles, cobbles and shell hash. and shell hash; (NB: possibly shallow buried reef as 3x sponges collected in dredge)
- Site 50 Rocky outcrop/rippled sands: buried bedrock, boulders, cobbles and pebbles partial covered in iron- rich sands with shell-hash;
- Site 53 Buried rock/Rippled sands: shell-debris flats



Source: Figure 7 showing reefs as brown dots, page 26: Benthic flora and fauna of the Patea Shoals region, South Taranaki Bight – with my additions (numbers sourced from Figure 2 of the same report)

A 2013 report by NIWA for the Ministry for the Environment to arrive at the list of sensitive marine benthic habitats – notes limitations due to the lack of exploration, and that indeed there may be other habitats that could be regarded as sensitive* As such Schedule 4B may need to be extended in the future.

There will always be the challenge of ‘lack of sampling’ – especially in the challenging coastal environment of the TRC’s jurisdiction. A precautionary approach necessitates the inclusion of the schedule.

The schedule also provides an ‘easy to understand’ list of habitats that need protection. Which is important from an information aspect for those engaging with the marine environment.

Exploration of New Zealand’s marine environment is still at an early stage and much of the marine environment and the diverse communities contained remains poorly charted.

*At present rates of collection it will take another 50 years before the seabed in the Territorial Sea, EEZ and ECS is fully swath mapped. *Further exploration over the next few years will, without doubt, yield further benthic habitats that may be sensitive to the types of sampling considered here. <https://www.mfe.govt.nz/sites/default/files/sensitive-marine-benthic-habitats-defined.pdf>*

Further Submissions Form – Proposed Coastal Plan for Taranaki

Your details

Name: Guy Roper Organisation: Port Taranaki Limited (PTL)

Address: 2-8 Bayly Road, PO Box 348, New Plymouth 4340.

Daytime phone number: +64 6 751 5050

Email address: guyr@porttaranaki.co.nz

Select one status:

I am or represent a person/organisation representing a relevant aspect of the public interest NO

I am or represent a person/organisation whose interest in the proposal is greater than that of the general public YES

Explain why you claim this status: Port Taranaki (PTL) made a submission on the Proposed Plan, and has an interest in property, land, air and water affected by the Proposed Plan

Do you wish to be heard in support of your further submission? YES

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the Proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
43 – Royal Forest and Bird Protection Society	Section 1.7 – Coastal Management Areas <i>Oppose the coastal management area approach adopted in the Plan as it is unclear as to how it applies to the wider coastal environment.</i>	<i>Oppose</i>	PTL considers the Coastal Management Area approach to be appropriate and is sound resource management.	Reject the general opposition to the Coastal Management Area approach from this submitter.
45 - Powerco	Objective 1- Integrated Management <i>Retain Objective 1 as notified</i>	<i>Support</i>	The objective is appropriate as notified and gives effect to the RMA and the higher order planning documents.	Accept the relief sought
46 - Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	Objective 5 – Coastal water quality <i>Retain Objective 5 as notified</i>	<i>Support</i>	The objective is appropriate as notified and gives effect to the RMA and the higher order planning documents.	Accept the relief sought
23 – New Plymouth District Council	Objective 6 – Natural character <i>Retain Objective 6 as notified</i>	<i>Support</i>	The objective is appropriate as notified and gives effect to the RMA and the higher order planning documents.	Accept the relief sought
23 – New Plymouth District Council	Objective 8 – Indigenous Biodiversity <i>Retain Objective 8 as notified</i>	<i>Support</i>	The objective is appropriate as notified and gives effect to the RMA and the higher order planning documents.	Accept the relief sought
48 – Taranaki District Health Board	Objective 9 – Relationship of Tangata Whenua with the Coastal Environment <i>Retain Objective 9 as notified</i>	<i>Support</i>	The objective is appropriate as notified and gives effect to the RMA and the higher order planning documents.	Accept the relief sought
48 – Taranaki District Health Board	Objective 10 – Treaty of Waitangi <i>Retain Objective 10 as notified</i>	<i>Support</i>	The objective is appropriate as notified and gives effect to the RMA and the higher order planning documents.	Accept the relief sought
43 – Royal Forest and Bird Protection Society	Objective 11 – Historic Heritage <i>Retain Objective 17 as notified</i>	<i>Support</i>	The objective is appropriate as notified and gives effect to the RMA and the higher order planning documents.	Accept the relief sought
43 – Royal Forest and Bird Protection Society	Objective 12 – Public use and enjoyment Amend Objective 12 to recognise additional matters set out in Policy 16(a), Policy 18(a), (b), (d) and (e), Policy 19(1), (3) and (4), and Policy 20 of the NZCPS.	<i>Oppose</i>	<i>PTL does not support the proposed amendments to this objective as it is not clear in the submission what those changes will be. It is also considered that the objective as notified is appropriate.</i>	<i>Reject the relief sought</i>
43 – Royal Forest and Bird Protection Society	Objective 13 – Coastal hazards risk and public health and safety Amend Objective 13 to address the wider coastal environment and to reflect the matters set out in Policies 24, 25, 26, and 27 of the NZCPS.	<i>Oppose</i>	<i>PTL does not support the proposed amendments to this objective as it is not clear in the submission what those changes will be. It is also considered that the objective as notified is appropriate.</i>	<i>Reject the relief sought</i>

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the Proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
43 – Royal Forest and Bird Protection Society	<p>Policy 1 – Coastal Management areas Seek discussion around Policy 1 to determine whether the characteristics listed under Outstanding Value, Estuaries Unmodified, Estuaries Modified, Open Coast and Port require all characteristics to apply together as indicated by the use of “and’ within the listings.</p>	<i>Support in part</i>	<i>PTL is supportive of discussions in relation to the Coastal Management Areas as notified but considers the notified wording is appropriate.</i>	<i>Accept the relief sought in part</i>
43 – Royal Forest and Bird Protection Society	<p>Policy 1 – Coastal Management areas Question whether the current wording of Policy 1 and its subheadings, account for the protection of biodiversity and associated values or merely define large management areas, which then have their values protected or uses provided through another policies. If this is the case it is unclear where these protective provisions are.</p>	<i>Support in part</i>	<i>Port Taranaki is supportive of discussions in relation to the Coastal Management Areas as notified but considers the notified wording is appropriate.</i>	<i>Accept the relief sought in part</i>
43 – Royal Forest and Bird Protection Society	<p>Policy 1 – Coastal Management areas Amend Plan by deleting Policy 1 OR Amend Policy 1:</p> <ul style="list-style-type: none"> ● to set out an area based management approach based on mapped and scheduled areas. Refer to relevant policies to identify characteristics in those areas which are not already for those areas in a schedule AND move the amended policy to section 5.2 so that it clearly sets out a management approach only within the CMA and applies only to the activities which are controlled under rules in the plan ● by amending the description of the management approach as per the submitter’s suggestions relating to Section 1.7 above and Policies 1(a), (b), (c), (d) and (e) below ● by including a statement that explains that Policy 1 does not provide direction for subdivision, use or development activities within the management areas. 	<i>Oppose</i>	<i>It is considered that Policy 1 setting out the Coastal Management Areas and the characteristics of those areas to be recognised is appropriate as notified with the exception of the minor amendment sought in PTL’s submission. In addition, the proposed amendments are not sufficiently clear for PTL to understand their implications for the entire coastal plan.</i>	<i>Reject the relief sought</i>

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the Proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
43 – Royal Forest and Bird Protection Society	<p>Policy 1 – Coastal Management areas</p> <p>Amend Policy 1(a) to read: <i>In managing the use, development and protection of resources under the Plan, recognition will be given to the following coastal management areas (identified in Schedule 1) and their distinguishing values, characteristics and uses:</i> (a) <i>Outstanding Value: Coastal areas of outstanding value (identified in Schedule 2) that characteristically: are areas of outstanding natural character and/or outstanding natural features or landscapes; contain values and attributes that are exceptional, including in relation to landforms, land cover, biodiversity, cultural and heritage associations, and visual qualities identified in Schedule 2 (refer corresponding Policy 7); contain marine areas with legal protection, including Parininihi Marine Reserve, Ngā Motu/Sugar-Loaf Islands Marine Protected Area and Tapuae Marine Reserve (identified in Schedule 1); and are iconic to the region's identity and sense of place</i> <i>These coastal management areas represent those areas that have been identified to meet the criteria under Policy 8: Outstanding Natural Character and Policy 9: Outstanding Natural Features and Landscapes. They are listed in Schedule 1(a) and shown on the Planning maps. The values and characteristics of these identified areas are set out in Schedule 2.</i></p>	Oppose	<p><i>It is considered that Policy 1 setting out the Coastal Management Areas and the characteristics of those areas to be recognised is appropriate as notified with the exception of the minor amendment sought in PTL's submission. In addition, the proposed amendments are not sufficiently clear or appropriate to give effect to the higher order documents.</i></p>	
43 – Royal Forest and Bird Protection Society	<p>Policy 1 – Coastal Management areas</p> <p>Amend Policy 1(a) to include specific provisions for marine reserves and protected marine areas under relevant policies.</p>	Oppose	<p><i>It is considered that Policy 1 setting out the Coastal Management Areas and the characteristics of those areas to be recognised is appropriate as notified with the exception of the minor amendment sought in PTL's submission. In addition, the proposed amendment is not sufficiently clear for PTL to understand its implications.</i></p>	Reject the relief sought
43 – Royal Forest and Bird Protection Society	<p>Policy 1 – Coastal Management areas</p>	Oppose	<p><i>It is considered that Policy 1 setting out the Coastal Management Areas and the characteristics of those areas to be recognised is appropriate as notified with the exception of the minor amendment sought in PTL's submission. In addition, the proposed amendments are not</i></p>	Reject the relief sought

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the Proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
	<p>Amend Policy 1(b) to read: <i>In managing the use, development and protection of resources under the Plan, recognition will be given to the following coastal management areas (identified in Schedule 1) and their distinguishing values, characteristics and uses: [...]</i> (b) Estuaries Unmodified: <i>Estuaries, not identified in (a) or (c) of this policy, that are permanently open to tidal movements and characteristically:</i> <i>(i) provide a natural focal point for human activity but are generally not significantly modified and are surrounded by minimal urban development and unmodified environments;</i> <i>(ii) have significantly different and more complex natural processes than the open coast; and</i> <i>(iii) provide important habitats, migration paths, breeding areas and nursery areas for marine and bird life.</i> <i>These coastal management areas are those estuaries that are permanently open to tidal movements. These areas do not include estuaries identified as Outstanding value areas. They are listed in schedule 1(b) and shown on the Planning maps. In determining the values and characteristic in these estuaries have particular regard to Policy 14 Indigenous Biodiversity, Policy X High natural character, Policy X other natural character, Policy X other natural features</i></p>		<p><i>sufficiently clear or appropriate to give effect to the higher order documents.</i></p>	
<p>43 – Royal Forest and Bird Protection Society</p>	<p>Policy 1 – Coastal Management areas</p> <p>Amend Policy 1(c) to read: In managing the use, development and protection of resources under the Plan, recognition will be given to the following coastal management areas (identified in Schedule 1) and their distinguishing values, characteristics and uses: [...] (c) Estuaries Modified: <i>Pātea, Waiwhakaiho and Waitara estuaries that are permanently open to tidal movements and characteristically: (i) have been modified by flood protection works and placement of structures; (ii) are surrounded by urban, extensively modified environments; (iii) have significantly different and more complex natural processes than the open coast; and (iv) provide important habitats, migration paths, breeding areas and nursery areas for marine and bird life.</i> These coastal management areas are those estuaries that are permanently open to tidal movements and have been modified. These areas do not include estuaries identified as Outstanding value areas or</p>	<p>Oppose</p>	<p><i>It is considered that Policy 1 setting out the Coastal Management Areas and the characteristics of those areas to be recognised is appropriate as notified with the exception of the minor amendment sought in PTL's submission. In addition, the proposed amendments are not sufficiently clear or appropriate to give effect to the higher order documents.</i></p>	<p><i>Reject the relief sought</i></p>

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the Proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
	<p>Estuary Unmodified. They are listed in schedule 1(b) and shown on the Planning maps. In determining the values and characteristic in these estuaries have particular regard to Policy 14 Indigenous Biodiversity, Policy X High natural character, Policy X other natural character, Policy X other natural features and landscapes and Policy XX water quality.</p>			
<p>43 – Royal Forest and Bird Protection Society</p>	<p>Policy 1 – Coastal Management areas</p> <p>Amend Policy 1(d) to read: In managing the use, development and protection of resources under the Plan, recognition will be given to the following coastal management areas (identified in Schedule 1) and their distinguishing values, characteristics and uses: [...] (d) Open Coast: Areas of the open coast not identified in (a), (b), (c) and (e) of this Policy that characteristically: (i) are subject to a high energy westerly wave environment and the coastal land behind the foreshore is generally naturally eroding; (ii) include reef systems that provide habitat to marine life, and are valued by Māori for mahinga kai; (iii) include nationally and regionally important surf breaks identified in Schedule 7 (refer corresponding Policy 10); and (iv) contain fisheries that are recreationally, culturally and commercially valuable. This coastal management area represents the remaining areas of the coastal marine area not identified in (a), (b), (c) and (e) of this Policy, this includes estuaries which are not permanently open to the sea. All other policies of the plan are relevant to determining values and characteristics of the coastal environment in this area.</p>	<p><i>Oppose</i></p>	<p><i>It is considered that Policy 1 setting out the Coastal Management Areas and the characteristics of those areas to be recognised is appropriate as notified with the exception of the minor amendment sought in PTL's submission. In addition, the proposed amendments are not sufficiently clear or appropriate to give effect to the higher order documents.</i></p>	<p><i>Reject the relief sought</i></p>
<p>43 – Royal Forest and Bird Protection Society</p>	<p>Policy 1 – Coastal Management areas</p>	<p><i>Oppose</i></p>	<p><i>It is considered that Policy 1 setting out the Coastal Management Areas and the characteristics of those areas to be recognised is appropriate as notified with the exception of the minor amendment sought in PTL's submission. It is considered that the characteristics of the port area need to be retained in order to distinguish the reasoning for the different management</i></p>	<p><i>Reject the relief sought.</i></p>

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the Proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
	<p>Amend Submitter seeks amendment to Policy 1(e) to read: In managing the use, development and protection of resources under the Plan, recognition will be given to the following coastal management areas (identified in Schedule 1) and their distinguishing values, characteristics and uses: [...] (e) Port: Port Taranaki, which is a highly modified environment that characteristically:</p> <p>(i) enables people and communities to provide for their economic wellbeing; (ii) contains nationally and regionally important infrastructure; (iii) contains port related activities that are accepted as appropriate uses of this coastal management area; (iv) has low levels of natural character, although is located adjacent to an area of outstanding value; and (v) can have significant effects on areas outside of the Port, including contributing to coastal erosion along the New Plymouth foreshore. This coastal management area represents the operational management area of Port Taranaki. The operational considerations and provisions for development capacity are set out in Policy X. In determining the values and characteristic in these estuaries have particular regard to Policy X Port of Taranaki, Policy 14 Indigenous Biodiversity, Policy X High natural character, Policy X other natural character, Policy X other natural features and landscapes and Policy XX water quality.</p>		<p><i>regime anticipated by the coastal plan for this area.</i></p> <p><i>In addition it is considered that the proposed amendments are not sufficiently clear or appropriate to give effect to the higher order documents.</i></p> <p><i>PTL has not had sufficient time to understand the implications of the proposed amendments for its operations.</i></p>	
43 – Royal Forest and Bird Protection Society	<p>NEW Policy 1A – Coastal Management areas (Port) Amend the Plan to include a new Policy specific to the Port of Taranaki and consistent with Policy 9 [Port] of the NZCPS.</p>	Oppose	<p><i>The proposed new policy is not sufficiently clear nor are its implications for PTL's operations within the context of the coastal plan provisions as notified.</i></p> <p><i>It is considered that Policy 1 setting out the Coastal Management Areas and the characteristics of those areas to be recognised is appropriate as notified with the exception of the minor amendment sought in PTL's submission.</i></p>	Reject the relief sought
13 – Spark New Zealand Trading Limited	<p>Policy 2 – Integrated Management Retain Policy 2 as notified.</p>	Support	PTL considers the policy to be generally appropriate as notified.	Accept the relief sought.
20 – Meridian Energy	<p>Policy 3 – Precautionary Approach Retain Policy 3 as notified.</p>	Support	PTL considers the policy to be generally appropriate as notified.	Accept the relief sought.

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the Proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
19 – South Taranaki District Council	Policy 4 – Extent and characteristics of the coastal environment Retain Policy 4 as notified.	Support	PTL considers the policy to be generally appropriate as notified.	Accept the relief sought
43 – Royal Forest and Bird Protection Society	Policy 6 – Activities important to the well-being of people and communities Amend Policy 6 to: <ul style="list-style-type: none"> • provide for new infrastructure as set out in the National Policy Standard – Electricity Transmission <input type="checkbox"/> • provide for activities regulated under the National Environmental Standards • provide for maintenance to enable the safe operation of existing regionally important infrastructure • provide for new regionally important infrastructure consistent with Policy 5 (subject to submitter's amendments) • provide for activities subject to appropriate avoidance, remediation or mitigation of adverse environmental effects. 	Oppose	PTL considers the policy to be generally appropriate as notified and does not consider the proposed amendments to be sufficiently clear in terms of intent or effect on its port operations.	Reject the relief as sought.
59 - KiwiRail	Policy 7 – Impacts on established operations and activities Retain Policy 7 as notified.	Support	PTL considers the policy to be appropriate as notified.	Accept the relief sought.
2 – Federated Farmers	Policy 8 – Areas of outstanding value Amend Policy 8 to read: <i>Protect the visual quality and the physical, ecological and cultural integrity of coastal areas of outstanding value identified in Schedule 1 from inappropriate use and development by:</i> <i>(a) avoiding adverse effects of activities on the values and characteristics identified in Schedule 2 that contribute to areas:</i> <i>having outstanding natural character; and/or</i> <i>being outstanding natural features and landscape;</i> <i>within or adjoining coastal management area – Outstanding Value; and</i> <i>(b) maintaining significant seascapes and visual corridors associated with outstanding natural features and landscapes, including views from within the landscapes or features, and views of the landscapes and features.</i>	Support in Part	Support the deletion of the words “or adjoining” in policy 8(a)	Accept the relief sought to Policy 8(a). PTL is neutral on the proposed amendments to Policy 8 (b).

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the Proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
43 – Royal Forest and Bird Protection society	Policy 9 – Natural Character and natural features and landscapes Amend Plan by deleting Policy 9	Oppose	PTL considers the policy to be generally appropriate as notified.	Reject the relief as sought.
43 – Royal Forest and Bird Protection society	Policy 9 – Natural Character and natural features and landscapes Amend Policy 9 by: <input type="checkbox"/> including a new clause that reads: Protect the natural character, features, and landscapes of the coastal environment by [...] (x) avoiding adverse effects of activities on natural character of the coastal environment with outstanding natural character and on outstanding natural features; <input type="checkbox"/> amending Policy 9(a)(v) to read: (v) maintains the integrity of significant areas of indigenous vegetation protects significant indigenous biodiversity and maintains or enhances indigenous biodiversity [...]	Oppose	PTL considers the policy to be generally appropriate as notified and the proposed amendments are unnecessary in the context of Policy 9.	Reject the relief as sought.
43 – Royal Forest and Bird Protection society	NEW Policy 9A – Criteria for identifying areas of outstanding or high natural character Amend the Plan to include a new Policy that determines/identifies areas of Outstanding Natural Character.	Oppose	PTL considers the proposed new policy to be unnecessary in the Coastal Plan.	Reject the relief as sought
43 – Royal Forest and Bird Protection society	NEW Policy 9A – Criteria for identifying areas of outstanding or high natural character Amend the Plan to include a new Policy to preserve areas of High Natural Character.	Oppose	PTL considers the proposed new policy to be unnecessary within the Coastal Plan.	Reject the relief as sought
43 – Royal Forest and Bird Protection society	NEW Policy 9A – Criteria for identifying areas of outstanding or high natural character Amend the Plan to include a new Policy for other natural character in all areas of the coastal environment.	Oppose	PTL considers the proposed new policy to be unnecessary within the Coastal Plan.	Reject the relief as sought
43 – Royal Forest and Bird Protection society	NEW Policy 9A – Criteria for identifying areas of outstanding or high natural character Amend the Plan to include a new Policy to provide a basis for determining outstanding natural features and landscapes.	Oppose	PTL considers the proposed new policy to be unnecessary within the Coastal Plan.	Reject the relief as sought

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the Proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
43 – Royal Forest and Bird Protection society	NEW Policy 9A – Criteria for identifying areas of outstanding or high natural character Amend the Plan to include a new Policy for other natural features and landscapes in all areas of the coastal environment.	Oppose	PTL considers the proposed new policy to be unnecessary within the Coastal Plan.	Reject the relief as sought
19 – South Taranaki District Council	Policy 10 – Restoration of natural character Retain policy 10 as notified	Support	PTL considers the policy to be appropriate as notified.	Accept the relief as sought.
19 – South Taranaki District council	Policy 11 – Coastal Water Quality Retain policy 11 as notified	Support	PTL considers the policy to be generally appropriate as notified.	Accept the relief as sought.
43 – Royal Forest and Bird Protection Society	NEW Policy 11A – Water quality limits Amend the Plan to include new policies to achieve Objective 5 [Coastal water quality] that set water quality targets and standards for freshwater and coastal water in the coastal environment to ensure that upstream water quality does not result in adverse effects in the coastal environment.	Oppose	The proposed new policy wording is not sufficiently clear nor are its implications for PTL's operations within the context of the coastal plan provisions as notified.	Reject the relief as sought.
46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	Policy 12 – Restoration of coastal water quality Retain policy 12 as notified	Support	PTL considers the policy to be appropriate as notified	Accept the relief as sought.
46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	Policy 13 – Coastal air quality Retain policy 13 as notified	Support	PTL considers the policy to be generally appropriate as notified.	Accept the relief as sought
26 – Transpower NZ Ltd	Policy 14 – Indigenous biodiversity Amend Policy14(b) to read: Protect areas of significant indigenous biodiversity in the coastal environment and maintain and enhance indigenous biodiversity by: [...] (b) avoiding significant adverse effects and avoiding, remedying and mitigating other adverse effects of activities on: (i) areas of predominantly indigenous vegetation in the coastal environment; (ii) habitats in the coastal environment that are important during the vulnerable life stage of indigenous species including:	Support	PTL generally supports this policy as notified but considers the amendment sought by Transpower is necessary and appropriate to give better effect to the NZCPS.	Accept the relief as sought

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the Proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
	i. estuaries; ii. spawning areas (e.g. snapper-trevally spawning area in the North Taranaki Bight between Mōhakatino River and Pariokariwa Point); iii. areas that provide passage for diadromous species; iv. marine mammal resting, feeding and breeding areas; and v. bird roosting and nesting areas; <i>unless following a route, site and method selection process, the activity is necessary for the provision of regionally important infrastructure, avoidance of adverse effects is not practicable and adverse effects are remedied or mitigated to the extent reasonably practicable; [...]</i>			
46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	Policy 15 – Historic heritage Retain policy 15 as notified	Support	PTL considers the policy to be generally appropriate as notified.	Accept the relief as sought
15 – Surfbreak Protection Society	Policy 16 – Relationship of Tangata Whenua Retain policy 16 as notified	Support	PTL considers the policy to be generally appropriate as notified.	Accept the relief as sought
45 - Powerco	Policy 17 – Public access Retain policy 17 as notified	Support	PTL considers the policy to be generally appropriate as notified.	Accept the relief as sought
45 – Powerco	Policy 18 – Amenity values Retain policy 20 as notified	Support	PTL considers the policy to be appropriate as notified.	Accept the relief as sought
48 – Taranaki District Health Board	Policy 20 – Avoidance of increasing coastal hazard or public safety risks Retain policy 18 as notified	Support	PTL considers the policy to be generally appropriate as notified.	Accept the relief as sought
43 – Royal Forest and Bird Protection Society	Policy 21 – Natural hazard defences Retain policy 21 as notified	Support	PTL considers the policy to be generally appropriate as notified.	Accept the relief as sought
43 – Royal Forest and Bird Protection Society	Policy 22 – Discharge of water or contaminants to coastal water Retain policy 22 as notified	Support	PTL considers the policy to be generally appropriate as notified.	Accept the relief as sought

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the Proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
48 – Taranaki District Health Board	Policy 24 – Discharge of treated wastewater containing human sewage Retain policy 24 as notified	Support	PTL considers the policy to be appropriate as notified.	Accept the relief as sought
48 – Taranaki District Health Board	Policy 25 – New discharge of treated wastewater containing human sewage Retain policy 25 as notified	Support	PTL considers the policy to be appropriate as notified.	Accept the relief as sought
48 – Taranaki District Health Board	Policy 26 – Discharge of treated wastewater containing human sewage Retain policy 26 as notified	Support	PTL considers the policy to be generally appropriate as notified.	Accept the relief as sought
46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	Policy 27 – Discharges of stormwater Retain policy 27 as notified	Support	PTL considers the policy to be appropriate as notified.	Accept the relief as sought
33 – New Zealand Defence Force	Policy 28 – Harmful aquatic organisms Retain policy 28 as notified	Support	PTL considers the policy to be appropriate as notified.	Accept the relief as sought
25 – New Zealand Petroleum and Minerals	Policy 29 – Impacts from offshore petroleum drilling and production Retain policy 29 as notified	Support	PTL considers the policy to be appropriate as notified.	Accept the relief as sought
46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	Policy 30 – Discharge of contaminants to air Retain policy 30 as notified	Support	PTL considers the policy to be appropriate as notified.	Accept the relief as sought
26 – Transpower NZ Ltd	Policy 31 – Structures that support safe public access and use, or public or environmental benefit Amend Policy 31 to read (or alternatively use the words "...to provide for"): Enable Structures in appropriate locations will be allowed for , subject to the appropriate management of adverse effects, where the structure is to provide for [...]	Support	The proposed amendment uses more appropriate policy wording and better gives effect to the higher order planning documents.	Accept the relief as sought
13 – Spark New Zealand Trading Ltd	Policy 32 – Placement of Structures Retain policy 32 as notified	Support	PTL considers the policy to be appropriate as notified.	Accept the relief as sought

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the Proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
43 – Royal Forest and Bird Protection society	<p><i>Policy 33 – Hard protection structures in coastal areas of outstanding value</i></p> <p>Amend Policy 33 to read: <i>Hard protection structures located within the coastal management area – Outstanding Value (identified in Schedule 2) will not have an adverse effect on the values and characteristics, including those identified in Schedule 2, that contribute to an area having outstanding value, in accordance with Policy 8.</i></p>	<i>Oppose</i>	<i>PTL considers that the proposed additional words are unnecessary and inappropriate and the policy should not be broadened beyond those values identified in Schedule 2.</i>	<i>Reject the relief as sought</i>
43 – Royal Forest and Bird Protection society	<p>NEW Policy 33A – Hard protection structures in coastal areas of significant value</p> <p><i>Amend Plan to include a similar policy to Policy 33 to address hard protection structures and adverse effect on sites and areas with significant values identified under Policy 14 of the Plan.</i></p>	<i>Oppose</i>	<i>This proposed new policy is considered to be unnecessary and inappropriate given its reference to a policy provision rather than specific areas and values identified in Schedule 2. Avoidance of significant effects on other areas of indigenous vegetation are sufficiently covered by Policy 14.</i>	<i>Reject the relief as sought</i>
59 – KiwiRail	<p>Policy 34 – Appropriateness of hard protection structures</p> <p><i>Retain policy 3(c) as notified</i></p>	<i>Support</i>	<i>PTL considers the policy to be appropriate as notified</i>	<i>Accept the relief as sought</i>
43 – Royal Forest and Bird Protection Society	<p>Policies 34 and 35 – Hard protection structures</p> <p>Amend Policies 34 and 35 (or add a new policy) to ensure that hard protection structures avoid adverse effects on indigenous biodiversity to be protected under Policy 14 of the Plan AND Ensure Policy 35 provides protection under Policies 8 and 9 of the Plan.</p>	<i>Oppose</i>	<i>Policy 14 already provides protection to areas of significant indigenous biodiversity and other areas of predominantly indigenous vegetation, consequently the proposed amendments or new policy are considered inappropriate and unnecessary.</i>	<i>Reject the relief as sought</i>
13 – Spark New Zealand Trading Ltd	<p>Policy 36 – Maintenance, repair, replacement and minor upgrading of existing structures</p> <p><i>Retain policy 36 as notified</i></p>	<i>Support</i>	<i>PTL considers the policy to be appropriate as notified</i>	<i>Accept the relief as sought</i>
13 – Spark New Zealand Trading Ltd	<p>Policy 37 – Alterations or extensions of existing structures</p> <p><i>Retain policy 37 as notified</i></p>	<i>Support</i>	<i>PTL considers the policy to be appropriate as notified</i>	<i>Accept the relief as sought</i>

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the Proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
43 – Royal Forest and Bird Protection Society	Policy 40 – Disturbance, deposition and extraction in marine protected areas Retain policy 40 as notified	Support	PTL considers the policy to be appropriate as notified	Accept the relief as sought
59 – KiwiRail	Policy 41 – Provision for disturbance, deposition or extraction activities that provide public or environmental benefit Retain policy 41 as notified	Support	PTL considers the policy to be appropriate as notified	Accept the relief as sought
13 – Spark New Zealand Trading Ltd	Policy 42 – Disturbance of the foreshore and seabed Retain policy 42 as notified	Support	PTL considers the policy to be appropriate as notified	Accept the relief as sought
57 – Heritage New Zealand	Policy 43 – Port dredging Amend Policy 43 by adding a new clause (e) to read: Maintenance and capital dredging activities for Port Taranaki, including spoil disposal, will be managed in order that: [...] <i>(e) adverse effects on historic heritage are managed in accordance with Policy 15.</i>	Oppose	PTL considers that this amendment to the policy is unnecessary and inappropriate.	Reject the relief as sought
43 – Royal Forest and Bird Protection Society	Policy 44 – Extraction or deposition or material Amend Policy 44 to read: Extraction of sand, shingle, shell and other natural material from the foreshore or seabed, or deposition of material on the foreshore or seabed, not provided for by Policies 39, 40, and 42 <i>will should:</i> [...];	Support	This minor amendment to the Policy is supported as it provided more appropriate and directive policy wording.	Accept the relief as sought.
26 – Transpower NZ Ltd	Policy 45 – Appropriateness of reclamation or drainage Support Policy 45(d) but amend Policy to read: <i>Enable</i> Reclamation or drainage of land in the coastal marine area <i>will not be allowed unless</i> where: [...] (d) the activity provides significant public benefit with particular regard to the extent to which the reclamation or drainage and intended purpose would provide for the efficient operation of nationally and regionally important infrastructure including, but not limited to, ports, airports, coastal roads, pipelines, electricity transmission, railways, marinas and electricity generation.	Support	The proposed amendment uses more appropriate policy wording and gives better effect to the higher order planning documents.	Accept the relief as sought.

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the Proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
43 – Royal Forest and Bird Protection Society	Policy 46 – Design of reclamation Amend Policy to provide for protection required by Policies 11, 13 and 14 of the NZCPS OR Alternatively retain Policy 46 as worded and amend Policies 5 and 45 as per the relief sought by the submitter in relation to those policies.	Oppose Support in part	PTL considers that the relief sought in the first part of this submission point is unclear and potentially inappropriate. PTL does not support the relief requested to Policy 5 so cannot support in its entirety the alternative relief sought.	Reject the relief sought in either of the alternatives proposed but retain Policy 46 as notified.
43 – Royal Forest and Bird Protection Society	Policy 47 – Taking and use of coastal water Retain policy 47 as notified	Support	PTL considers the policy to be appropriate as notified.	Accept the relief as sought
33 – New Zealand Defence Force	Policy 49 – Noise and vibration Retain policy 49 as notified	Support	PTL considers the policy to be appropriate as notified.	Accept the relief as sought
2- Federated Farmers	Methods 1-7 – General Retain Methods 1-7 as notified	Support	Methods of implementation 1-7 are considered appropriate and are generally consistent with methods of implementation in other RMA plans.	Accept the relief as sought.
43 - Royal Forest and Bird Protection Society	Method 8 – Coastal management framework Amend Implementation Method 8 to read: Implement Plan objectives, policies and methods of implementation that recognise different coastal processes, values, and uses, and which allow, regulate or prohibit activities in; 1. the following coastal management areas: a) Outstanding Value b) Estuaries Unmodified c) Estuaries Modified d) Open Coast e)Port; and 2. areas identified as having: a) significant indigenous biodiversity values under Policy 14 b) areas with natural character values under Policy XX c) areas with natural features and landscapes under Policy XX; Consistent with policies in section 5.1.	Oppose	PTL supports the five Coastal Management Areas as notified and does not consider it necessary or appropriate to include the additional areas identified in this submission point.	Reject the relief as sought.
2- Federated Farmers	Methods 13-20 – Natural heritage Retain Methods 13-20 as notified	Support	Methods of implementation 13-20 are considered appropriate and are generally consistent with methods of implementation in other RMA plans.	Accept the relief as sought

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2- Federated Farmers	Method 34 – Public Use and enjoyment Retain Implementation 34 as notified	Support	PTL supports the establishment and continued operation of a working group of relevant agencies, landowners, iwi and interest groups in respect to consideration of the Significant Surfing Area.	Accept the relief as sought
7 – Waikato Regional Council	Method 50 Regional marine oil responses Support Implementation Method 50 relating to marine oil responses	Support	PTL considers method 50 is appropriate and maintenance of the Regional Marine Oil Spill Plan and appropriate resourcing and training of responders should be supported in the Coastal Plan.	Accept the relief as sought
43 - Royal Forest and Bird Protection Society	Method 51 Noise Standards Amend Implementation Method 51 to delete reference to New Zealand Standards and replace with: <i>[...] considerations of the latest information of the effects of noise of marine species and habitats. The use of the most recent professionally supported noise modelling for the marine environment. Taking a precautionary approach where limited information is available.</i>	Oppose	Consideration of NZ Noise Standards is important and appropriate and should not be deleted from this method.	Reject the relief as sought.
43 - Royal Forest and Bird Protection Society	Rules – General Amend rules to change “ecological effects” to “effects on indigenous biodiversity” in matters for control AND Amend permitted activity rules by replacing references to avoiding adverse effects on Policy 11 matters with permitted activities that limit the activity type, scale and location to the extent that the activity will not have an adverse effect which is inconsistent with achieving Policy 11 of the NZCPS.	Oppose	PTL considers that it is inappropriate to change “ecological effects” to “effects on indigenous biodiversity” without a proper section 32 analysis of the potential impact of such a change and narrowed focus. In addition the proposed amendments to the permitted activities requested in this submission point are potentially ultra vires, by reason of being uncertain.	Reject the relief as sought
46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	Rule 2 – Stormwater discharges Retain Rule 2 as notified	Support	PTL considers the rule as notified is appropriate and gives appropriate effect to the higher order planning documents.	Accept the relief as sought.
54 – Maritime New Zealand	Rule 4 – Petroleum dispersant use Amend Plan by deleting Rule 4 OR	Oppose and support in part	PTL opposes deletion of this rule as permitted activity status will enable rapid response to a natural marine oil seep during capital dredging.	<i>Reject the request to delete Rule 4. Accept the relief requested to clarify that the rule relates to permitting the discharge of a dispersal product to control an oil seep.</i>

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the Proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
	Amend Rule 4 by replacing the term “petroleum dispersant” with “oil spill control agent” to clarify the difference between a dispersant to be used on petroleum products (spilt in the marine environment) and petroleum based dispersants.		PTL supports clarification of the type of dispersal product that will be permitted.	
16 – Ministry for Primary Industries	<p>Rule 9 – Sampling and biofouling Amend permitted activity rule for in-water cleaning of biofouling to read:</p> <p><u>Activity:</u> <u>In-water cleaning of biofouling from the part of a ship, moveable object or navigation aid that is normally below the water surface, resulting in the discharge of a contaminant into water in the coastal marine area and any associated:</u> <u>(a) deposition on the foreshore or seabed.</u> <u>Note: If the activity does not meet the standards, terms and conditions in this Rule refer to Rule 13.</u> <u>Standards/terms/conditions:</u> <u>(a) the anti—foul coating on the ship, moveable structure or navigational aid shall not have exceeded its planned service life as specified by the manufacturer, and the cleaning method shall be undertaken in accordance with the coating manufacturer’s recommendations;</u> <u>(b) microfouling may be cleaned without capture;</u> <u>(c) goose barnacles may be cleaned without capture;</u> <u>(d) macrofouling (other than goose barnacles) coverage on the ship, moveable structure or navigational aid shall be less than or equal to 2 on the Level of Fouling rank (Floert et al (2005));</u> <u>(e) all biological material greater than 50 microns in diameter dislodged during cleaning (other than goose barnacles) shall be captured and disposed of at an approved landfill; and</u> <u>(f) if any person undertaking or responsible for the cleaning, suspects that harmful or unusual aquatic species (including species designated as unwanted organisms or pest species under the Biosecurity Act 1993) are present on the ship, structure or navigational aid, that person shall take the following steps:</u> <u>i. any cleaning activities commenced shall cease immediately, and</u> <u>ii. the Taranaki District Council and the Ministry for Primary Industries shall be notified without unreasonable delay; and</u> <u>iii. the cleaning may not recommence until notified by the Council to do so, or in the event a designated unwanted organisms or pest species is found, notified to do so by the Ministry for Primary Industries.</u> <u>Notes</u></p>	Oppose	PTL seeks further information on the intent of this rule and its consequences for port related activities, including, but not limited to, proposed use of the words “In-water”, “microfouling”, and “macrofouling” compared with the rule as notified.	Reject the relief as sought.

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	<p><u>1. For the purposes of the above, further guidance is provided in the Anti—fouling and In-water Cleaning Guidelines (June 2013).</u></p> <p><u>2. International vessels arriving into New Zealand waters have additional obligations under the Craft Risk Management Standard: Biofouling on Vessels Arriving to New Zealand (May 2014).</u></p> <p><u>Footnotes</u></p> <p><u>Defined in Floerl et al (2005) A Risk-based Predictive Tool to Prevent Accidental introductions of Nonindigenous Marine Species as: Light Fouling - 1—5% of visible surface covered by very patchy macrofouling. Remaining area often covered in microfouling.</u></p>			
37 – Petroleum Exploration and Production Association of NZ	Rule 12 – Seismic surveying and bathymetric testing Retain rule 12 as notified	Support	PTL considers the rule as notified is appropriate and gives appropriate effect to the higher order planning documents.	Accept the relief as sought
6 – Trans-Tasman Resources Ltd	Rules 13 and 14 – Other discharges Retain Rules 13 and 14 as these rules appropriately recognise and provide for other discharge activities to be assessed as either discretionary in open coast or non-complying in the more sensitive outstanding value areas and are consistent with the activity status given to “other” activities (Rules 33, 34, 42 and 43).	Support	PTL agrees with the submitter that these rules appropriately recognise and provide for other discharges in the Open Coast and Port Management Areas as a discretionary activity and as a non-complying activity in more sensitive management areas.	Accept the relief as sought
47 – Fonterra	Rule 17 – Other discharges to air Retain rule 17 as notified	Support	PTL considers the rule as notified is appropriate and gives effect to the higher order planning documents.	Accept the relief as sought
58 – Te Atiawa	Rule 19 – Mooring structure placement in the Port Retain rule 19 as notified	Support	PTL considers the rule as notified is appropriate and gives effect to the higher order planning documents.	Accept the relief as sought
43 – Royal Forest and Bird Protection Society	NEW Rule 19A – Mooring structure placement in Port Amend the Plan to include a new rule for mooring structure placement in the Port that cannot comply with Rule 19 as a Restricted Discretionary or Discretionary Activity) and include a matter of discretion to consider the effects on indigenous biodiversity values.	Oppose	This rule is not considered necessary and is more appropriately dealt with by Rule 23.	Reject the relief sought.

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29 – Department of Conservation	Rule 20 – Mooring structure placement Retain rule 20 as notified	Support	PTL considers the rule as notified is appropriate and gives effect to the higher order planning documents.	Accept the relief as sought
29 – Department of Conservation	Rule 21 – Navigation aid erection and placement Amend Rule 21 to include a new standard/term/condition before Condition (a) to read: <i>The activity is undertaken by:</i> (i) Taranaki Regional Council or its agents; or (ii) Port Taranaki; or (iii) Maritime New Zealand or its agents.	Support	PTL considers that the proposed amendment is appropriate, in that other organisations not listed could erect these structures through the resource consent process to ensure that they are erected with the appropriate expertise and that there are no unintended consequences.	Accept the relief as sought
45 – Powerco	Rule 22 – Network utility structure erection or placement Retain rule 22 as notified	Support	PTL considers the rule as notified is appropriate and gives effect to the higher order planning documents.	Accept the relief as sought.
43 – Royal Forest and Bird Protection Society	Rule 23 – Port launching, mooring and berthing Amend Rule 23 to make the erection and placement of launching, mooring or berthing structures in the Port a Restricted Discretionary Activity (rather than a Controlled Activity).	Oppose	PTL considers the proposed amendments to be inappropriate as launching, mooring and berthing structures are consistent with the purpose of the port and gives better effect to Policy 9 of the NZCPS. Controlled activity provides for more certainty for development and diversification	Reject the relief as sought.
25 – New Zealand Petroleum and Minerals	Rule 26 – Exploration or appraisal of well drilling in the Open Coast or port Retain rule 26 as notified	Support	PTL considers the rule as notified is appropriate and gives effect to the higher order planning documents.	Accept the relief as sought.
6 – Trans-Tasman Resources Ltd	NEW Rule 26A – Disturbance of seabed by mining Amend Plan to include new rule 26A to explicitly address disturbance of the seabed by drilling, which would read as follows: <i>26A Disturbance of seabed by drilling</i> Classification: Permitted activity Coastal management areas: Estuaries Unmodified, Estuaries Modified, Open Coast, Port Standards, terms and conditions (a) Drilling is confined to mud, silt, sand, gravel and other fine sediments; (b) drilling does not occur within the Schedule 2 locations or within 200m of the Schedule 2 locations;	Oppose in part.	It is considered that the proposed new rule errs in calling it “disturbance of sea bed by mining” rather than “disturbance of the sea bed by drilling”, and this point needs to be clarified. PTL seeks clarification on the intention of the rule and may be in a position to support it once that clarification is received.	Reject the relief as sought to the extent that PTL seek further clarification on the intent of the rule.

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	<p><i>(c) spacing between drilling locations (other than a re-drill or twinning of a hole) is not less than 0.5 km;</i></p> <p><i>(d) recurrent drilling (other than a re-drill or twinning of a hole) at the same location does not occur more frequently than once every two months;</i></p> <p><i>(e) the volume of material removed from a drilling location does not exceed 0.3 m³;</i></p> <p><i>(f) the area of seabed disturbed at a drilling location does not exceed 3 m²;</i></p> <p><i>(g) drilling does not have an adverse effect on the values associated with historic heritage identified in Schedule 5 [Historic heritage];</i></p> <p><i>(h) drilling does not have an adverse effect on any threatened or at risk (declining) species, or any rare and uncommon ecosystem type, including those identified in Schedule 4 [Significant indigenous biodiversity] or any reef system; and</i></p> <p><i>(i) Taranaki Regional Council is informed of the scale, location and timing of the activity at least five working days before work commences by entering details of the of the activity at www.trc.govt.nz/informcouncil.</i></p>			
<p>21 – Climate Justice Taranaki</p>	<p>Rules 26, 27 and 28 –Exploration or appraisal of well drilling in the Open Coast or Port</p> <p><i>Seek that drilling of any petroleum exploration or appraisal well and associated activities in the CMA be a Prohibited Activity</i></p> <p><i>OR</i></p> <p><i>If this is not acceptable to Council, seek that the drilling of any petroleum exploration or appraisal well and associated activities in the Open Coast and Port be a Discretionary Activity (rather than Controlled Activity) and that consent applications be Publicly Notified (whether the activity is deemed Discretionary or Controlled)</i></p> <p><i>OR</i></p> <p><i>If Rule 26 retains its Controlled Activity status, seek that the setback distance of 1,000m from sensitive marine benthic habitat (Schedule 4B), reef system or boundary of Outstanding Value coastal management areas be increased to at least 6,000 m.</i></p>	<p><i>Oppose</i></p>	<p><i>PTL does not consider prohibited activity status to be appropriate in respect to placement of a well structure in the Open Coast or Port Area and considers that controlled activity status as notified is more appropriate and gives better effect to the NZCPS. PTL supports the discretionary activity status where Rule 26 does not apply and non-complying activity status in the more sensitive areas of Outstanding Value, Estuaries Modified and Estuaries Unmodified.</i></p>	<p><i>Reject the relief sought</i></p>

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the Proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
51 - Taranaki Energy Watch	Rules 26 to 30 – Exploration or appraisal well drilling Support the bundling of consents in Rules 26 to 30 and that activities that include an onshore and offshore component should be bundled together, however, oppose the use of bundling making all petroleum activities a Controlled Activity in the CMA.	Oppose	The proposed amendments in this submission point are not clear and it is considered that the provisions as notified are more appropriate.	Reject the relief as sought.
25 – New Zealand Petroleum and Minerals	Rule 29 – Petroleum production installation erection or placement – Port and Open Coast Retain Rule 29 as notified	Support	PTL considers the rule as notified is appropriate and gives effect to the higher order planning documents.	Accept the relief as sought
25 – New Zealand Petroleum and Minerals	Rule 30 – Petroleum production installation erection or placement – Outstanding Value, Estuaries Unmodified and Estuaries Modified Retain Rule 30 as notified	Support	PTL considers the rule as notified is appropriate and gives effect to the higher order planning documents.	Accept the relief as sought.
45 – Powerco	Rule 34- Other structure erection or placement Retain Rule 34 as notified	Support	PTL considers the rule as notified is appropriate and gives effect to the higher order planning documents.	Accept the relief as sought.
45 – Powerco	Rule 37 - Existing lawfully established network structures Amend Rule 37 to read: Lawfully established network utility structure maintenance , repair, alteration or extension where the structure is: (a) a pipeline that is buried or attached to a bridge or access structure; [...] (d) a communication or electricity cable that is buried or attached to a bridge or access structure or pole ; or [...] (d) discharge of sediment and does not come within or comply with Rule 35 [...]	Support	This proposed minor amendment is appropriate and clarifies that maintenance is intended to be included in this rule.	Accept the relief as sought

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the Proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
13 – Spark New Zealand Trading Limited	<p>Rule 38 – Existing lawfully established structure removal and replacement</p> <p>Amend the standards/terms/conditions of Rule to read: [...] (f) the replacement structure is built in the same or similar location as the original structure; (g) the existing structure is removed completely with no waste being placed into the coastal marine area, unless the removal of the structure is considered by a Suitably Experienced and Qualified Coastal Professional, in collaboration with the Regional Council. to have greater adverse effects on the environment than leaving it in place;</p> <p>OR</p> <p>the standards/terms/conditions are amended to read: (f) the replacement structure, except for submarine cables or lines, is built in the same location as the original structure. A replacement submarine cable or line must be laid or suspended within a horizontal distance of no more than three times the depth of water from the cable or line which is being replaced; (g) the existing structure is removed completely with no waste being placed into the coastal marine area, unless the removal of the structure is considered by an independent suitably qualified and experienced coastal practitioner, to have greater adverse effects on the environment than leaving it in place. The reasoning for this must be provided to Taranaki Regional Council; [...]</p>	Support in part	PTL support's the first submission point and does not prefer the alternative submission point.	Accept the relief sought in the first part of the submission point by Amending the standards/terms/conditions of Rule to read: [...] (f) the replacement structure is built in the same or similar location as the original structure; (g) the existing structure is removed completely with no waste being placed into the coastal marine area, unless the removal of the structure is considered by a Suitably Experienced and Qualified Coastal Professional, in collaboration with the Regional Council. to have greater adverse effects on the environment than leaving it in place;
47 – Fonterra	<p>Rule 38 – Existing lawfully established structure removal and replacement</p> <p>Retain Rule 38 as notified</p>	Support in part	Rule is appropriate but is clarified with the additional amendments proposed by Spark above	Accept the relief as sought with the addition of the relief sought by Spark New Zealand Limited above.
46 – Z Energy, BP Oil Ltd and Mobil Oil NZ Ltd	<p>Rule 39 – Existing lawfully established Port structure maintenance and repair</p> <p>Amend the Activity Description of Rule 39 to read:</p> <p>Existing lawfully established structure maintenance, repair or alteration where the activity relates to that part of the wharves or breakwaters that is normally above the water surface including any attached structures, and relates directly to port company operations and any associated: [...]</p>	Support	PTL considers the amendment proposed to the rule is appropriate	Accept the relief as sought

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the Proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
46 – Z Energy, BP Oil Ltd and Mobil Oil NZ Ltd	Rule 40 – Existing lawfully established Port structure maintenance and repair Retain Rule 40 as notified	Support	PTL considers the rule as notified is appropriate and gives effect to the higher order planning documents.	Accept the relief as sought
40 – Te Runganga o Ngati Mutunga	Rule 41 – Existing lawfully established Port repair, alteration and extension Amend Rule 41 to make the maintenance, repair or alteration of structures in the Port that does not come within or comply with other related rules a Discretionary Activity (rather than a Controlled Activity).	Oppose	PTL considers that controlled activity status is more appropriate and consistent with the provisions of the NZCPS as the Port requires certainty of consent to repair, alter and extend existing lawfully established structures.	Reject the relief as sought.
32- Port Taranaki	Rule 42 – Other structure repair, extension, removal or replacement	Comment: this submission point by Port Taranaki has been incorrectly summarised in the summary of submissions.	This is the comment made by the port The Port has considerable infrastructure investment in the Port Coastal Management Area and it is important that it has certainty in respect to repair, alteration, extension or removal and replacement of structures that it is responsible for. It is considered appropriate that the activity status of this rule for port activities should be controlled rather than full discretionary.	This was the original relief sought 1. Insert a new rule specifically for the Port Coastal Management area and in respect to port activities providing controlled activity status for other structure repair, alteration, extension or removal and replacement that is not provided for in Rules 35 to 41 2. Make any consequential amendments to other rules and objectives and policies to give effect to this submission. Alternatively provide another rule structure or Amendments /additional rules, to rules 35-41 that delivers the same result for the Port.
43 – Royal Forest and Bird Protection Society	Rule 44 – Structure removal or demolition Retain Rule 44 as notified	Support	PTL considers the rule as notified is appropriate and gives effect to the higher order planning documents.	Accept the relief as sought
46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	Rule 46 – Structure removal or demolition Retain Rule 46 as notified	Support	PTL considers the rule as notified is appropriate and gives effect to the higher order planning documents.	Accept the relief as sought

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the Proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
43 – Royal Forest and Bird Protection Society	Rule 47 – Temporary occupation for community, recreational or sporting events <i>Amend Rule 47 to make temporary occupation for community, recreational or sporting events a Controlled Activity (rather than a Permitted Activity).</i>	<i>Oppose</i>	<i>Permitted activity status with appropriate standards and terms enables people and communities to provide for their social, economic and cultural well being consistent with the purpose of the RMA.</i>	<i>Reject the relief as sought.</i>
46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	Rule 48 – Continued occupation <i>Retain Rule 48 as notified</i>	<i>Support</i>	<i>PTL considers the rule as notified is appropriate and gives effect to the higher order planning documents.</i>	<i>Accept the relief as sought</i>
46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	Rule 49 – Continued occupation <i>Retain Rule 49 as notified</i>	<i>Support</i>	<i>PTL considers the rule as notified is appropriate and gives effect to the higher order planning documents.</i>	<i>Accept the relief as sought</i>
59 – KiwiRail	Rule 51 – Clearance of outfalls, culverts and intake structures <i>Retain Rule 51 as notified</i>	<i>Support</i>	<i>PTL considers the rule as notified is appropriate and gives effect to the higher order planning documents.</i>	<i>Accept the relief as sought</i>
6 – Trans-Tasman Resources Ltd	Rule 52 – Collection of benthic grab samples <i>Retain Rule 52 as this rule appropriately enables monitoring of effects on benthic communities by providing for the removal of benthic material as a permitted activity where it is for scientific or monitoring purposes and where it meets the terms set out in the rule.</i>	<i>Support</i>	<i>Rule is considered appropriate as the port is required to take samples from time to time.</i>	<i>Accept the relief as sought</i>
43 – Royal Forest and Bird Protection Society	Rule – 56 – dredging and spoil disposal – Open Coast <i>Retain Rule 56 as notified</i>	<i>Support</i>	<i>PTL considers the rule as notified is appropriate and gives effect to the higher order planning documents.</i>	<i>Accept the relief as sought</i>
43 – Royal Forest and Bird Protection Society	Rule 57 – Beach Replenishment <i>Retain Rule 57 as notified</i>	<i>Support</i>	<i>PTL considers the rule as notified is appropriate and gives effect to the higher order planning documents.</i>	<i>Accept the relief as sought</i>
47 – Fonterra	Rule 60 – Other disturbance, damage, destruction, removal or deposition <i>Retain Rule 60 as notified</i>	<i>Support</i>	<i>PTL considers the rule as notified is appropriate and gives effect to the higher order planning documents.</i>	<i>Accept the relief as sought</i>

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the Proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
6 – Trans-Tasman Resources Ltd	Rules 60 and 61 – Other disturbance, damage, destruction, removal or deposition Retain Rules 60 and 61 providing for other disturbance activities as Discretionary or Non-complying in more sensitive areas and suggests this is appropriate and consistent with the way in which the other rules have approached similar catch all provisions (Rules 13, 14, 33, 34, 42, and 43).	Support	PTL considers the rule as notified is appropriate and gives effect to the higher order planning documents.	Accept the relief as sought.
29 – Department of Conservation	Rule 63 – Reclamation or drainage Retain Rule 63 as notified	Support	PTL considers the rule as notified is appropriate and gives effect to the higher order planning documents.	Accept the relief as sought
6 - Trans-Tasman Resources Ltd	Rule 65 – Taking or use of water, heat or energy Retain Rule 65 as this rule appropriately provides for the taking and use of coastal water as a Permitted Activity where the taking and use would not affect significant sites, species, or ecosystems.	Support	PTL considers the rule as notified is appropriate and gives effect to the higher order planning documents.	Accept the relief as sought.
43 – Royal Forest and Bird Protection Society	General standards – 8.6.2. – Light Amend 8.6.2 [General standards for lights] to include: <ul style="list-style-type: none"> • standards for lights to be shielded or of a colour so that they do not attract or disturb seabirds • new standard to avoid lighting near any seabird, including penguin, breeding areas • new standards for navigational aids and safety to mitigate any adverse effects on seabirds. 	Oppose	PTL does not support further constraints on its lighting needs for operations or maintenance. The proposed amendments to this provision are unclear.	Reject the relief sought.
43 – Royal Forest and Bird Protection Society	Section 9.1.8 – General – environmental compensation Amend Section 9.1.8 [General environmental compensation] to delete the following: 9.1.8 General – environmental compensation Purpose: To provide environmental compensation where an activity will have adverse effects, which will not be adequately avoided, remedied or mitigated by protecting, restoring and/or enhancing natural and physical resources and/or amenity values elsewhere in the coastal environment in the same general locality.	Oppose	PTL considers that support in the Coastal Plan for environmental compensation where an activity will have an adverse effect which will not be adequately avoided, remedied or mitigated by protecting, restoring and/or enhancing natural and physical resources and/or amenity values elsewhere is appropriate.	Reject the relief sought.

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the Proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	Definitions – general Retain the RMA definitions such as “best practicable option”, “coastal marine area”, “common marine and coastal areas”, “discharge”, “environment”, “structure”, and “industrial or trade premises”.	Support	It is appropriate to retain these RMA definitions unaltered.	Accept the relief as sought.
29 – Department of Conservation	Definition – Adaptive management Page 161 Retain the definition “adaptive management” as notified.	Support	PTL considers it appropriate to retain the definition of adaptive management as it clarifies this concept as used in the Proposed Coastal Plan.	Accept the relief as sought.
57 – Heritage New Zealand	NEW Definition – Alteration Amend Plan to include a new definition for “alteration” to read: <i>Alteration, in relation to buildings, means any changes to the fabric or characteristics of a structure involving, but not limited to, the removal and replacement of walls, windows, ceilings, floors or roofs, either internally or externally and includes any sign attached to the structure. In relation to structures, means any changes to function, layout, or appearance of a structure without changing its physical dimensions.</i>	Oppose	This definition as proposed is inappropriate in the context of the rules that the word is used in the Proposed Coastal Plan. In addition it does not assist with what a “minor alteration” would be, and could create confusion.	Reject the relief as sought.
43 – Royal Forest and Bird Protection Society	Definition – Amenity Values Amend definition of “amenity values” to include visual amenity as part of amenity values.	Oppose	It is considered more appropriate to retain the RMA definition than amend as proposed.	Reject the relief as sought.
16 – Ministry for Primary Industries	Definition – Biofouling Amend the definition of “biofouling” to include the following words: <ul style="list-style-type: none"> • “aquatic environment” • “microfouling” – a layer of microscopic organisms including bacteria and diatoms and the slimy substances they produce, Often referred to as a ‘slime layer’, microfouling can usually be removed by gently passing a finger over the surface. • “macrofouling” – any organism not included in the definition of “microfouling”. 	Oppose	PTL has opposed the deletion of Rule 9 and the new wording requested by MPI and consequently opposes the proposed new definitions which are intended to support the new wording. PTL is not in a position to support these proposed additions to the definition without further information on the consequences of the proposed changes to the rule.	Reject the relief as sought
33 – New Zealand Defence Force	Definition – Biofouling Retain the definition of “biofouling” as notified.	Support	PTL considers that this definition is appropriate and should be retained as notified.	Accept the relief as sought.

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the Proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
43 – Royal Forest and Bird Protection Society	<p>Definition – Coastal environment Amend Plan by mapping the coastal environment for Taranaki and referencing this in an amended definition of “coastal environment” OR Alternatively delete the definition: <u>Coastal environment means the areas where coastal processes, influences or qualities are significant, including lakes, lagoons, tidal estuaries, saltmarshes, coastal wetlands, and the margins of these and includes the coastal marine area.</u></p>	Oppose in part	PTL does not support deletion of the definition but would consider amendments to the definition alongside mapping of the extent of the coastal environment, but is concerned that mapping of the coastal environment would need to be opened up for submissions: i.e. would need to be notified. .	Reject the alternative submission point requesting deletion of the definition.
26 – Transpower NZ Ltd	<p>New definition – functional need Amend Plan to include a new definition for “functional need” to read: <u>The locational, operational, practical or technical needs of an activity, including development and upgrades.</u></p>	Oppose	This word is used in Policies 5 and 32 and in Rule38 (as a standard/condition) in a manner that PTL considers does not require a specific definition to understand. The ordinary meaning of this word is more helpful and it is unclear how the proposed definition would provide further clarification.	Reject the relief sought.
46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	<p>Definition – Maintenance Amend definition of “maintenance” to read: Maintenance in relation to structures, includes <u>replacement, repair, or renewal, activities for the purpose of keeping a structure in good condition and/or working efficiently which restore a structure or asset to its original authorised standard and purpose</u>, and where the character, intensity and scale of the structure, <u>or asset or site</u> remains the same or similar. <u>In relation to network utilities it includes the addition of extra lines.</u> It excludes the extension <u>or repair</u> of structures or assets, or change in location.</p>	Support	PTL considers that the proposed amendments improve the definition and provide more certainty	Accept the relief as sought.
43 – Royal Forest and Bird Protection Society	<p>NEW Definition – Major alteration or extension Amend Plan to include a new definition of “major alteration or extension” to mean any alteration or extension of a structure which does not meet the definition of a minor alteration or extension.</p>	Oppose	The word “major alteration” is only used in the policies and PTL considers the ordinary meaning of the word is appropriate in the circumstances where it is used. PTL does not consider there is a need to introduce the word “major alteration” to the rules.	Reject the relief sought.
29 – Department of Conservation	<p>New Definition – Microfouling Amend Plan to include a new definition of “microfouling” that reads: <u>Microfouling – is a layer of microscopic organisms including bacteria and diatoms and the slimy substances they produce. Often referred to as a ‘slime layer’, microfouling can usually be removed by gently passing a finger over the surface.</u></p>	Oppose	PTL does not consider that it is necessary to include a new definition of “microfouling” to the coastal plan. See submission point above in relation to MPI requested additions to the definition of biofouling, and PTL’s opposition to proposed amendments to Rule 9.	Reject the relief sought.

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the Proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
43 – Royal Forest and Bird Protection Society	NEW Definition – Minor alteration or extension Amend Plan to include a new definition of “minor alteration or extension” to read: <u>Minor alteration or extension means, the alteration of a structure where the alteration or extension is within the same footprint, does not result in an increase in adverse effects over effects generated from the operation and maintenance of the structure.</u>	Oppose	PTL does not support this proposed new definition as it requires a judgment to be made on adverse effects and is not a definition per se.	Reject the relief as sought.
29 – Department of Conservation	Definition – Natural Character Amend definition of “natural character” to better reflect Policy 13 of the NZCPS.	Support in part	There is no detail or clarity on the wording that would apply. PTL would consider amendments to improve the clarity and alignment of the definition.	Reject the relief requested due to its lack of clarity on the changes sought.
29 – Department of Conservation	Definition – Natural feature Amend definition of “natural character” to better reflect Policy 15(c) of the NZCPS.	Support in part	There is no details or clarity on the wording that would apply. PTL would consider amendments to improve the clarity and alignment of the definition.	Reject the relief requested due to its lack of clarity on the changes sought.
43 – Royal Forest and Bird Protection Society	Definition – Natural landscape Amend definition of “natural landscape” to include in the definition that protection of natural character of the coastal environment is set out in Policy 15 of the NZCPS.	Oppose	PTL considers it is not appropriate to include reference to a policy in a definition as it is not helpful in defining what the words mean. It is noted that “natural landscape” as a term is used very infrequently in the Proposed Coastal Plan, and one of those few occurrences is in the definition of natural feature. The proposed amendment is not required.	Reject the relief as sought.
43 – Royal Forest and Bird Protection Society	Definition – Port Amend the definition of “Port” to state that the port is Port Taranaki OR Alternatively delete the definition.	Oppose	There is no need for change given this aligns with Policy 1 which PTL has generally supported. The current definition of “Port” means the coastal management area identified in Schedule 1. PTL considers this is adequate and clear.	Reject the relief as sought.
43 – Royal Forest and Bird Protection Society	NEW Definition – Reclamation Amend definition of “reclamation” to read (or similar): <u>The formation of permanent land located above mean high water springs that was formerly below the line of mean high water springs. Reclamation does not include:</u> <u>1. land that has arisen above the line of mean high-water springs as a result of natural processes, including accretion, or</u> <u>2. any infilling where the purpose is to provide beach nourishment, or</u> <u>3. structures such as breakwaters, moles, groynes or sea walls.</u>	Oppose	PTL considers that a new definition of reclamation is not required. The proposed definition also supports other submission points requested by the submitter that PTL does not support.	Reject the relief as sought.

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the Proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
45 – Powerco	Definition – Regionally important infrastructure Retain the definition of “regionally important infrastructure” as notified but adopt the term “regionally significant infrastructure” (instead of the term “regionally important infrastructure”) to ensure consistency between the Plan and other planning documents such as the Regional Policy Statement.	<i>Support in part</i>	<i>. PTL supports retaining the definition as notified and to the extent that it supports consistency in wording between this Proposed Coastal Plan and the higher order planning documents (NZCPS and RPS). However, PTL notes that the words “infrastructure of regional importance” are used in the NZCPS and the term regionally significant infrastructure is used in the RPS.</i>	<i>Accept the relief sought to retain the definition as notified and to the extent that consistency is achieved with the higher order planning documents.</i>
47 – Fonterra	Definition – Repair Retain the definition of “repair”.	<i>Support</i>	<i>PTL considers that the definition of repair is appropriate and necessary to understand the intent of the rules that provide for it.</i>	<i>Accept the relief as sought.</i>
43 – Royal Forest and Bird Protection Society	Definition – Reverse Sensitivity Retain the definition of “reverse sensitivity” as notified.	<i>Support</i>	<i>PTL considers that this definition is appropriate in that it outlines what a reverse sensitivity effect is.</i>	<i>Accept the relief as sought.</i>
23 – New Plymouth District Council	Schedule 2 – Coastal areas of outstanding value Supports as notified	<i>Support</i>	<i>PTL considers the identification of outstanding value areas in Schedule 2 to be generally appropriate and do not require amendments.</i>	<i>Accept the relief as sought.</i>

FURTHER SUBMISSION IN SUPPORT OF OR IN OPPOSITION TO SUBMISSION ON NOTIFIED PROPOSED PLAN

TO: TARANAKI REGIONAL COUNCIL

SUBMITTER: Te Rūnanga o Ngāti Mutunga

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Please find attached a further submission made on behalf of Te Rūnanga o Ngāti Mutunga on the proposed Taranaki Regional Coastal Plan

Te Rūnanga o Ngāti Mutunga made a submission to the Taranaki Regional Council on the Proposed Plan in April of 2018.

Te Rūnanga o Ngāti Mutunga has an interest in the Proposed Plan greater than the general public has due to:

1. The Rūnanga is the mandated post settlement entity for the Ngāti Mutunga iwi which has mana whenua status over the coastal area from Titoki Ridge in the North to Te Rau o Te Huia in the south.
2. Ngāti Mutunga has a recognised Statutory Authority Area over the CMA between these two coastal points.

We wish to be heard in support of this submission

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
61 – Te Rūnanga o Ngāti Ruanui Trust General - petroleum provisions	General - Petroleum provisions Amend plan to reflect governments position regarding off-shore oil and gas permits	Support	With the recent change in government policy the Plan would be more effective and work more efficiently if it was amended to reflect this.	Amend the plan as proposed
50 – Te Kāhui o Taranaki Trust General – surf breaks	General – surf breaks Amend the names of the surf breaks – following consultation	Support	Support that names for surf breaks that area offensive to Maori or others are not included in the descriptions in this Plan	Consult with mana whenua about appropriate naming of surf breaks
48 – Taranaki District Health Board Section 2.1 Statutory and planning framework	Section 2.1 Statutory and planning framework Submission recommends that the Te Tiriti o Waitangi is expressly outlined in this section of the plan	Support	The inclusion of Te Tiriti o Waitangi in this part of the plan only occurs as part of the description of the NZCPS – we support a specific section that includes Te Tiriti and how it will guide the work in this area.	Amend as proposes
50 – Te Kāhui o Taranaki Trust Section 2.6 New Environmental Management Plans	Section 2.6 New Environmental Management Plans Introduce a new 2.6 to address Environmental Management Plans	Support	The Taranaki Regional Council is required to recognise Iwi Management Plans and it would benefit this part of the plan if they were included here with an explanation of how the Council intends to take these plans into account	Amend as proposes

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
7 – Waikato Regional Council Section 3.1 Coastal environment	Section 3.1 and Policy 2 – Coastal Environment Amend 3.1 and policy 2 to show that activities outside of CMA influence the CMA	Support	Te Rūnanga o Ngāti Mutunga support this submission because strengthens the objective of the plan to include integrated management – it is illogical not to recognise the adverse impact that activities that occur adjacent to or outside the CMA can have.	Amend as proposed
47 – Fonterra Objective 2 - Appropriate use and development	Objective 2 Appropriate use and development Provide for regionally important industry	Oppose	Te Rūnanga o Ngāti Mutunga do not support the specific inclusion of ‘regionally important industry’ in this objective. We feel that the plan already adequately provides for a balance between use of the Coastal area for economic use and the protection of the environmental and cultural values of the CMA.	Retain provision as drafted
29 – Department of Conservation Objective 5 - Water quality	Objective 5 – Water Quality Amend the wording of this objective to aim at restoring water quality where it has been degraded not just enhancing it	Support	Te Rūnanga o Ngāti Mutunga support the aim of this submission in that it makes it clear that we should be aiming at the restoration of water quality where it has been degraded not just enhancing it.	Amend as proposes
61 – Te Rūnanga o Ngāti Ruanui Trust Objective 5 - Water quality	Objective 5 – Water quality Asks that this objective specifically includes maintenance and enhancement of mauri values	Support	Support this submission in that it introduces the cultural value of mauri into this objective – this ensures that the work that is carried out under this objective will need to ensure that the results are measured by standards that reflect Tangata Whenua values and aspirations for water quality	Amend as proposed

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
32 – Port Taranaki Policy 1 Coastal management areas	Policy 1 Coastal management areas Effects outside of the Port	Oppose	The Port and its activities, and the potential to contribute to events such as coastal erosion outside the Port area should be noted so any new activity is assessed in terms of these potential risks	Retain as notified
41 – Te Korowai o Ngāruahine Trust	Policy 1 Coastal management areas Recognise marine spatial planning and ecosystem based management, kaitiaki plans, Māori values within each CMA	Support	It is important to recognise and transition to spatial planning and ecosystem based management to ensure there are no gaps in our environmental policy framework. It is also important to mention Māori values within each CMA to reaffirm Māori relationship to the coastal environment	Amend as proposed
61 – Te Rūnanga o Ngāti Ruanui Trust	Policy 1 Coastal management areas – specifically Estuaries Modified Provide for taonga species, cultural and traditional associations and heritage	Support	Important to specifically reference these species and values in the description of modified estuaries. The modified estuaries within the Ngāti Mutunga rohe are extremely important mahinga kai and cultural sites for the iwi.	Amend as proposed
7 – Waikato Regional Council Policy 2 Integrated Management	Policy 2 – Integrated Management Integrated management and new section for cross boundary related provisions	Support	To ensure integrated management is successful, provisions relating to cross boundary effects with other regional and district councils should be included in the Plan.	Include new section for cross boundary effects
2 – Federated Farmers Policy 8 – Area of Outstanding value	Policy 8 – Area of Outstanding value Submission asks for the removal of the clause that specifically protects significant seascapes and the visual corridors associated with outstanding natural features and landscapes.	Oppose	Do not support the removal of this clause as it provides protection for a value that is important to many parts of the community.	Retain as notified

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
6 – Trans-Tasman Resources Ltd Policy 8	Policy 8 – Area of Outstanding value Addition of clause that “(other than minor or transitory effects)	Oppose	Not convinced that there is a need for this qualification to be added to this clause at the policy level	Retain as notified
41 – Te Korowai o Ngāruahine Trust Policy 8-15	Policies 8 - 15 Replace ‘significant adverse effects’ with ‘adverse effects’	Support	The use of the word significant leave it open to interpretation and ‘adverse effects’ means that this policy will be in line with the wording contained in the rules of the Plan	Amend as proposed
29 – Department of Conservation Policy 9	Policy 9 Asks for the wording - protect the natural character, features, and landscapes to be added to this policy	Support	Support the increased clarity that this will bring to this policy.	Amend as proposed
6 – Trans-Tasman Resources Ltd Policy 11	Policy 11 Coastal water quality Submission asks for a change in the wording from maintain or enhance to maintain and enhance	Oppose	Important to take a broader approach to protection. Instead of maintain <u>or</u> enhance, use maintain <u>and</u> enhance.	Retain as notified
61 – Te Rūnanga o Ngāti Ruanui Trust Coastal water quality Policy 11 and policy 12	Coastal water quality Policy 11 and policy 12 Asks for the addition of recognition of mauri values	Support	The inclusion of mauri indicators/values will provide for a greater level of cultural protection and culturally appropriate monitoring. This will significantly add to the ability of this plan to protect the values that are important to Tangata Whenua within the CMA	Amend as proposes
6 – Trans-Tasman Resources Ltd Policy 13	Policy 13 Coastal air quality	Oppose	Important to take a broader approach to protection. Instead of maintain <u>or</u> enhance, use maintain <u>and</u> enhance.	Retain as notified

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
<p>6 – Trans-Tasman Resources Ltd</p> <p>Policy 14 – Indigenous Biodiversity</p>	<p>Policy 14 – Indigenous Biodiversity</p> <p>Indigenous biodiversity – submission asks for the removal of protection for at risk (declining) and regionally distinctive indigenous taxa. Also the removal of this link in this policy to Schedule 4</p>	Oppose	<p>The protection of biodiversity which is one of the aims of this plan is best achieved by valuing and protecting all indigenous species and ecosystems not just those that are at risk (declining).</p> <p>Also do not support the removal of Schedule 4 as this provides for the recognition and protection of important habitats</p>	Retain as notified
<p>41 – Te Korowai o Ngāruahine Trust</p> <p>Policy 15 – Historic Heritage</p>	<p>Policy 15 – Historic Heritage</p> <p>Asks for the policy to be amended to specifically recognise the role of Kaitiaki and the mātauranga evidence supplied by Tangata whenua</p>	Support	This is an important recognition of mātauranga, and kaitiakitanga and would enable this policy to protect the Historic heritage of everyone in Taranaki.	Amend as proposed
<p>6 – Trans-Tasman Resources Ltd</p> <p>Policy 16 – Tangata Whenua</p>	<p>Policy 16 – Tangata Whenua</p> <p>Asks for a revision of this policy specifically the need to prepare at cultural impact assessment and the involvement of tangata whenua in the development of conditions</p>	Oppose	Te Rūnanga o Ngāti Mutunga do not support the revision of this policy as asked for in this submission. The use of Cultural Impact Assessments and the involvement of tangata whenua in the development of consent conditions is an increasingly common occurrence during the consenting process and is an efficient way of ensuring that such consents – ‘avoid, remedy or mitigate effects on Māori as the RMA requires. As stated in the policy it is only intended for this to happen when it is ‘appropriate’	Retain as notified

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
41 – Te Korowai o Ngāruahine Trust Policy 17 - Public access	Policy 17 - Public Access Amend to ensure enhancing public access doesn't compromise sites of significance and indigenous biodiversity.	Support	Increased public access should not be promoted where it will be to the detriment of sites of significance and indigenous biodiversity.	Amend as proposed
41 – Te Korowai o Ngāruahine Trust Policy 18 – Amenity values	Policy 18 – Amenity Values Include references to Schedules 5A and B, 4A	Support	Support the specific linking of policies to the relevant plan schedules as it policy to the relevant schedules in the plan	Amend as proposed
41 – Te Korowai o Ngāruahine Trust Policy 19 – Surf breaks and Significant Surfing Area	Policy 19 – Surf Breaks Ensure protection of surf breaks is not incompatible with sites of cultural significance	Support	Sites of cultural significance require appropriate protection from recreational activities such as surfing.	Amend as proposed
60 – Te Kaahui o Rauru Policy 22 – discharge to water	Policy 22 Discharge to water Asks for the inclusion of Māori values as an criteria acceptable quality	Support	Support this submission in that it introduces the use of Māori cultural values into this Policy – this ensures that the work that is carried out under this policy will need to ensure that the results are measured by standards that reflect Tangata Whenua values and aspirations for water quality	Amend as proposed
41 – Te Korowai o Ngāruahine Trust Policy 24 – Discharge of treated wastewater	Explicitly reference iwi as distinct from general community	Support	Due to the relationship that Māori have with the coastal environment it is important to explicitly mention iwi as being distinct from the general community	Amend as proposed

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
25 - New Zealand Petroleum and Minerals 37 – Petroleum Exploration and Production Association of NZ Policy 38 – Removal of coastal structures	Policy 38 - Amend to factor in unreasonable costs and unreasonable risks on human health and safety, and considerations from the International Maritime Organisations 1989 guidelines.	Oppose	Decommissioning regulations are currently being prepared – it would be more sensible to retain the original wording of this policy until the regulations are finalised.	Retain as notified
41 – Te Korowai o Ngāruahine Trust Policy 40 – Disturbance, deposition and extraction in marine protected areas	Policy 40 - Inclusion of future marine protected areas	Support	Important for the plan to provide for future marine areas that may also be designated for legal protection	Amend as proposed
6 – Trans-Tasman Resources Ltd Policy 43 – Port Dredging	Policy 43 - Allow dredging for ports or nationally significant or regional significant infrastructure, not only for Port Taranaki	Oppose	It is important to control dredging activities and the associated effects and therefore confining this activity to Port Taranaki where it is required for ongoing operation.	Retain as notified
9 – Karen Pratt Policy 44 - Extraction or deposition of material	Policy 44 - Submission asks that this activity does not occur in close proximity to offshore reefs and having regard to sensitive geological features	Support	It is important that this is specifically mentioned in this policy due to the high environmental and cultural importance these areas have. Welcome the addition of sensitive geological features also being included.	Amend as proposed
41 – Te Korowai o Ngāruahine Trust	Policy 44 - Exclude areas in Schedules and areas subject to crown applications or settlement under Marine and Coastal Area (Takutai Moana) Act 2011	Support	It is important for the plan to protect areas identified under the Schedules of this plan and also those areas that are currently under applications under the Marine and Coastal Area (Takutai Moana) Act 2011	Amend as proposed

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
Policy 44 - Extraction or deposition of material				
41 – Te Korowai o Ngāruahine Trust Method 1 – Advice and information	Method 6.1 - Include provision for advice and information about the cultural significance and importance of the marine environment to Māori, iwi/hapū	Support	Te Rūnanga of Ngāti Mutunga support the provision of specific information relating to the sites and values that Taranaki iwi/hapū have identified in the CMA. We ask that the TRC work with iwi/hapū to ensure that the information they provide is appropriate.	Amend as proposed
41 – Te Korowai o Ngāruahine Trust Method 1 and 2 – Economic instruments and works and service	Methods 6.1.1 and 6.1.2 Delete reference to ‘consider’	Support	Important that the need to provide for these mechanisms as an offset to utilising and potential impacting upon resources within the marine environment is clearly stated in the wording of this method	Amend as proposed
61 – Te Rūnanga o Ngāti Ruanui Trust Method 6.1. 4 – State of the Environment monitoring	Method 6.1.4 Include cultural monitoring specifically in this description	Support	The inclusion of cultural monitoring is now a requirement for the State of the Environment Monitoring and this should be reflected in method description of this plan with detail of how the TRC intends to implement this.	Amend as proposed
29 – Department of Conservation Methods 6.4	Method 6.4 Asks for a new method of implementation for the enforcement of dog control bylaws to protect species.	Support	Te Rūnanga o Ngāti Mutunga support this due to the problems we have had within our rohe with the lack of enforcement of the current dog control bylaws. This has resulted in numerous deaths of one of our taonga species – the Kororā due to them being killed by dogs.	Amend as proposed

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
57 – Heritage New Zealand Method 21- 30	6.5 Historic Heritage - Asks for the addition of a method that specifically asks for there be a methods built into the plan that ensures that Schedule 7 and sites of significance to iwi/hapū are updated	Support	It is important that a method is established that enables Schedule 7 to be updated as this has proved to be a problem with other plans that are in operation within the Ngāti Mutunga rohe. For plans such as this to work properly they need to include the most up to date information on any new sites that have been identified. It is important to have a robust system that links this schedule to any new sites – such as those listed on the New Zealand Heritage list to enable these sites to be protected.	Amend as proposed
41 – Te Korowai o Ngāruahine Trust Method 21 – 31 – Historic heritage	6.5 Historic Heritage Support implementation of Methods 21-31	Support	Important to implement provisions which are in line with tangata whenua values	Amend as proposed
42 – Ngāti Hine hapū Method 25 – iwi involvement	6.5 Historic Heritage – method 25 Remove word consider in Method 25 and replace with a stronger term	Support	It is important that the language in this methods explicitly facilitates and actively encourages and enables the Council’s partnership with iwi and hapū	Amend as proposed
50 – Te Kāhui o Taranaki Trust Method 12 Method 32 – Resource Consents	Amend so as to not impact adversely on Māori cultural values	Support	Important that public access, use and enjoyment isn’t at the detriment of Māori cultural values	Amend as proposed
43 – Forest and Bird General rules	General Rules - Better connection and alignment to NZCPS in relation to avoiding adverse effects	Support	Te Rūnanga o Ngāti Mutunga support the request for this plan to have an increased connection and alignment to the NZCPS and note that this is a requirement for all Regional Coastal Plans	Amend as proposed

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
<p>56 – Greenpeace</p> <p>General rules</p>	<p>General Rules -</p> <p>Amend to ensure that fishing rules adverse effects in line with NZCPS and other rules</p>	Support	As above - alignment and consistency with the NZCPS is a requirement for all Regional Coastal Plans-	Amend as proposed
<p>61 - Te Rūnanga o Te Rūnanga o Ngāti Ruanui Trust Trust</p>	<p>Rules – General;</p> <p>That monitoring programmes referred to within the rules section include cultural or mauri indicators/values</p> <p>Specifically asking for additions to the following rules: 2,3,6, 7,10,11,14,,13,22,25,27,28,29, 31,33,34,38,42,43, 44,45,46,49,50</p>	Support	<p>The inclusion of cultural or mauri indicators/values in monitoring programmes will provide for a greater level of cultural protection and culturally appropriate monitoring.</p> <p>This will significantly add to the ability of this plan to protect the values that are important to Tangata Whenua within the CMA</p> <p>It would ensure that any adverse effects on sites of significance to Ngāti Mutunga can be assessed using culturally appropriate methods</p> <p>The addition of these conditions would also strengthen the partnership with iwi and signals a greater respect for Māori knowledge</p>	Amend as proposed

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
21 – Climate Justice Taranaki Rules 13 and 14	Further clarification regarding catch all rules and ask that if retained that they be publically notified	Support	Te Rūnanga o Ngāti Mutunga supports this submission as we are opposed to any discharge of contaminants into the CMA or other water bodies and if this is to be retained would support the increased participation that public notification of this activity would provide.	Provide clarification as proposed
43 – Royal Forest and Bird Protection Society	Rule 25 – Hard protection structure erection or placement Amend by clarifying the purposes to which erosion control applies	Support	Support that the use of hard surfaces for erosion control be limited by defining the purpose – ie as stated in the submission for important infrastructure	Amend as proposed
6 - Trans-Tasman Resources Ltd New Rule 26A	NEW Rule 26A – Disturbance of seabed by mining	Oppose	Te Rūnanga o Ngāti Mutunga oppose the inclusion of the new rule as suggested by Trans-Tasman Resources Ltd due to our opposition to sea bed mining due to the adverse environmental and cultural effects it can cause. We feel that the addition of this rule would remove the environmental and cultural protection that is provided by the existing rules and it is an unnecessary addition to the rules	Relief be declined

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
29 – Department of Conservation Rule 37 – Existing lawfully established network structures	Rule 37 – Existing lawfully established network structures Submission asks that this rule be amended to include a provision about limiting the size of any extension to the structure	Support	Support this amendment so the rule provides a clear limit when pipelines are extended beyond their original limit	Amend as proposed
30 – First Gas Ltd Rule 37 – Existing lawfully established network structures	Rule 37 – Repair, alteration and extension of an existing lawfully established network structures Asks that this rule be amended to made this a permitted activity	Appose	Due to the possible negative environmental effects caused by this activity Te Rūnanga o Ngāti Mutunga do not support it becoming a permitted activity	Relief be declined
58 – Te Atiawa Rule 37 – Existing lawfully established network structures	Rule 37 – Existing lawfully established network structures Amend to recognise iwi as an affected party and change reference to schedules 5A and 5B	Amend	Support the recognition of iwi as an affected part for this rule due to the possibility of adverse effects on sites and values of cultural significance.	Amend as proposed
38 - First Gas Ltd Rule 38 – existing structures	Rule 38 – Existing Structures Asks that Network utility pipeline removal and replacement be a permitted activity	Appose	The possible adverse effects of pipeline removal in any part of the CMA means that this activity should have the protection afforded by it being classed as a Discretionary activity	Relief be declined

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
21 – Climate Justice Taranaki Rule 38 – existing structures	Rule 38 – existing structures Asked that the activity status for this rule be amended to discretionary	Support	The amendment would offer greater protection, increased ability for affected parties to be engaged and the increased ability to set and monitor broader conditions	Amend as proposed
41 – Te Korowai o Ngāruahine Trust 58 – Te Atiawa Rule 49 Continued Occupation	Rule 49 Continued Occupation Asks for rule to be amended for this activity to be made a Restricted Discretionary Activity (rather than a permitted activity)	Support	Support this reclassification as it will allow for the continued occupation of the CMA by these structures to be reviewed.	Amend as proposed
41 – Te Korowai o Ngāruahine Trust Rule 52 – Collection of benthic grab samples	Rule 52 – Collection of benthic grab samples Amend to require notification of iwi of any benthic grab sampling authorised by this rule	Support	Te Rūnanga o Ngāti Mutunga support the need for iwi to be notified of this activity	Amend as proposed
58 – Te Atiawa 61 – Te Rūnanga o Te Rūnanga o Ngāti Ruanui Trust Trust Rule 56 – Dredging	Rule 56 – Dredging Protection of sites of significance and key species	Support	The suggested changes provide for a greater level of environmental and cultural protection and ensures that there is consistency of protection throughout the plan	Amend as proposed

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
58 – Te Atiawa Rule 58 – Introduction of exotic plants	Rule 58 – Introduction of exotic plants Asks for additional discussion/information	Support	Te Rūnanga of Ngāti Mutunga would like the TRC to clarify under what circumstances they think it would be advantageous to introduce exotic plants onto the foreshore and seabed of the estuaries modified, open coast and port areas of the CMA	Further information/Clarification sought
21 - Climate Justice Taranaki	Rules 60 and 61 – Other disturbance, damage, destruction, removal or deposition Amend: Notes concerns that Rules 60 and 61 are silent on seabed mining and seeks that the Plan be amended to make seabed mining a Prohibited activity.	Support	Te Rūnanga o Ngāti Mutunga opposes seabed mining due to adverse environmental and cultural effects it causes and would support the clear statement that this is a prohibited activity within all areas of the CMA	Amend as proposed
26 – Transpower NZ Ltd	Inclusion of new rule 61A relating specifically related to Regionally important infrastructure	Seek clarification	Te Runanga o Ngāti Mutunga do not feel that this submission provides enough information to justify the need for a specific rule relating to Regionally Important Infrastructure	Relief not be granted – Ask for additional information or evidence
60 – Te Kaahui o Rauru Section 9.1.3, 9.1.5 and 9.1.6 – financial contributions	Asks that these sections include the option of improving Kaitiakitanga	Support	Important to recognise the importance and value of recognising kaitiakitanga in environmental compensations	Amend as proposed

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
60 – Te Kaahui o Rauru 9.2.1 matters to be considered	Clarification about cultural effects	Support	Agree that further clarification is needed about whether cultural effects are intended to be included under community effects in the matters to be considered.	Provide clarification
41 – Te Korowai o Ngāruahine Trust Section 10.1 – Monitoring	Section 10.1 Amend to include a specific method about engaging in dialogue with iwi in order to understand perceptions and values, and the application of mātauranga Māori.	Support	Te Rūnanga o Ngāti Mutunga supports the inclusion of Maori values as a focus point for the Councils monitoring. This would ensure that any adverse effects on sites of significance to Te Rūnanga o Ngāti Mutunga and other iwi/hapū can be assessed using a culturally appropriate method.	Amend as proposed
60 Te Kaahui o Rauru Section 10.1 – Monitoring	Section 10.1 – Monitoring Amend Section 10.1 to include Māori values as a focus point in monitoring.	Support	Te Rūnanga o Ngāti Mutunga supports the inclusion of Maori values as a focus point for the Councils monitoring. This would ensure that any adverse effects on sites of significance to Te Rūnanga o Ngāti Mutunga and other iwi/hapū can be assessed using a culturally appropriate methods	Amend as proposed

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
50 – Te Kāhui o Taranaki Trust Section 10.1 – monitoring	Section 10.1 monitoring Development of a Te Ao Māori monitoring regime in partnership with Māori	Support	As for above - This would ensure that any adverse effects on sites of significance to Te Rūnanga o Ngāti Mutunga can be assessed using a culturally appropriate methods	Amend as proposed
46 - Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd Definition – Reverse sensitivity	Definition – Reverse sensitivity Amend the definition of “reverse sensitivity” to read: Amend the definition of “reverse sensitivity” to read: Reverse sensitivity refers to <u>the potential for the operation of an existing effects of sensitive activities on other</u> lawfully established <u>activities to be constrained or curtailed by the more recent establishment or intensification of other activities which are sensitive to the proposed activity in their vicinity.</u>	Oppose	Ngāti Mutunga supports the current definition of reserve sensitivity and feels that this definition already gives adequate protection to existing activities	Relief be Declined
6 - Trans-Tasman Resources Ltd Schedule 2 – Coastal areas of outstanding value	Schedule 2 – Coastal areas of outstanding value Amend Schedule 2 to delete inclusion of the Project Reef (ONC6) as an area of outstanding value, including: <ul style="list-style-type: none"> • the reference to ONC6 and Map-link Map 42 on page 121; • the entire ONC6 Project Reef material on page 129; and • Map Link Map 42 	Oppose	Ngāti Mutunga support the inclusion of the Project Reef (ONC6) as an area of outstanding value in recognition of the amount of evidence collected by the South Taranaki Underwater Club showing the biodiversity values of this site	Relief be declined

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
10 - South Taranaki Underwater Club Schedule 2 Coastal Areas of outstanding Value	Schedule 2 Coastal Areas of outstanding Value Inclusion of Project Reef Site	Support	Ngati Mutunga would like to support the inclusion of this area in the Schedules 2 (Coastal areas of Outstanding Value) in recognition of the amount of evidence that has been gathered by the South Taranaki Underwater club about the biodiversity value of the Project Reef site.	Relief be given
6 - Trans-Tasman Resources Ltd Schedule 4A Significant species and ecosystems	Schedule 4A Significant species and ecosystems 'Seek that Schedule 4A is deleted in its entirety or amended to remove any non-threatened species and any at risk species other than those which are listed as at risk (declining) under the New Zealand Threat Classification System.'	Oppose	The protection of biodiversity which is one of the aims of this plan is best achieved by valuing and protecting all indigenous species and ecosystems not just those that are at risk (declining).	Relief be declined
6 - Trans-Tasman Resources Ltd Schedule 4B – Sensitive marine benthic habitats	Schedule 4B – Sensitive marine benthic habitats 'amend plan by deleting Schedule 4B in its entirety'	Oppose	The schedule allows for the recognition and protection of important marine habitats	Relief be declined
(61) Te Rūnanga o Ngati Ruanui (41) Te Korowai o Ngāruahine Trust (60) Te Kahui o Rauru Schedule 5B	Submitters asked for inclusion of additional sites to Schedule 5B	Support	The inclusion of these additional sites of significance will insure that this plan is able to protect all of the sites that have cultural and historical significance to tangata whenua and will add to the long term sustainability of this plan	Amend as proposed

Further Submissions Form – Proposed Coastal Plan for Taranaki

Use this form for multiple further submissions on the Proposed Coastal Plan for Taranaki.

Important:

- Further submissions can be made only by a person/organisation representing a relevant aspect of the public interest, or a person/organisation whose interest in the proposal is greater than that of the general public
- Further submissions can only be made in support or opposition of an existing submission and must not raise any new points.
- You are obliged to notify the original submitters to whom your further submissions relate. [Find their email address here](#)

Email your further submissions to coastal@trc.govt.nz with 'Proposed Coastal Plan further submission' in the subject field.

Submissions close at 4pm on Saturday 4 August 2018

Your details

Name: Sarah Roberts

Organisation (if applicable): Taranaki Energy Watch

Address: 39A Celia Street Stratford 4332

Daytime phone number: 0273362611

Email address: taranakienergywatch@gmail.com

Select one status:

I am or represent a person/organisation representing a relevant aspect of the public interest NO

I am or represent a person/organisation whose interest in the proposal is greater than that of the general public YES

Explain why you claim this status: TEW is an incorporated community group with a longstanding involvement in submitting on environmental issues both regionally and nationally. We are recognised as stakeholders by Taranaki Regional Council and participated in feedback prior to public notification of the proposed plan.

Do you wish to be heard in support of your further submission? YES

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	Section 3.1 – Taranaki coastal environment The risk of, or <u>and</u> vulnerability to, coastal hazards may increase over time, <u>for instance</u> due to climate change and sea level rise.	Oppose in part	It is well understood that the risk of and vulnerability to coastal hazards may increase over time due to climate change and sea level rise.	The risk of, or <u>and</u> vulnerability to, coastal hazards may increase over time due to climate change and sea level rise.
45 – Powerco	Objective 3 – Reverse sensitivity Amend Objective 3 to read: The use and ongoing operation, <u>maintenance, and upgrading of</u> nationally and regionally important infrastructure and other existing lawfully established activities is protected from new or inappropriate use and development in the coastal environment.	Oppose	TEW understands that maintenance would be part of the use and ongoing operation and would be accepted as such. If the effects of the maintenance of the operation were not anticipated as part of the consenting process for the original operation then this would potentially require a further consent. It is unclear what is meant by ‘upgrading’. Upgrading could potentially mean expansion of the operation which could possibly create adverse effects that were not anticipated by the consenting process for the original operation. This would potentially require a further consent.	Retain as notified.
46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	Objective 3 – Reverse sensitivity Amend Objective 3 to read: The use and ongoing operation, <u>maintenance, and upgrading of</u> nationally and regionally important infrastructure and other existing lawfully established activities is protected from new or inappropriate use and development in the coastal environment.	Oppose	TEW understands that maintenance would be part of the use and ongoing operation and would be accepted as such. If the effects of the maintenance of the operation were not anticipated as part of the consenting process for the original operation then this would potentially require a further consent. It is unclear what is meant by	Retain as notified.

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
			'upgrading'. Upgrading could potentially mean expansion of the operation which could possibly create adverse effects that were not anticipated by the consenting process for the original operation. This would potentially require a further consent.	
43 – Royal Forest and Bird Protection Society	Policy 3 – Precautionary approach Amend Policy 3 to remove reference to “adaptive management”.	Support	It supports TEW’s precautionary approach at para.16 and para.17 of our evidence.	Amend the plan as proposed.
50 – Te Kāhui o Taranaki Trust	Policy 3 – Precautionary approach Amend Policy 3 to read: Adopt a precautionary approach, which may include using an adaptive management approach, where the effects of any activity on the coastal environment are uncertain, unknown, or little understood, but potentially significantly adverse.	Oppose	It doesn’t support TEW’s precautionary approach at para.16 and para.17 of our evidence.	Retain as notified.
55 –Kiwis Against Seabed Mining	Policy 3 – Precautionary approach Amend to note that the precautionary approach should be applied to objectives, policies and rules in the plan that relate to oil and gas, fishing and seabed mining activities.	Support	It supports TEW’s precautionary approach at para.16 and para.17 of our evidence.	Amend the plan as proposed.
56- Greenpeace	Policy 3 – Precautionary approach Amend to note that the precautionary approach should be applied to objectives, policies and rules in the plan that relate to oil and gas, fishing and seabed mining activities.	Support	It supports TEW’s precautionary approach at para.16 and para.17 of our evidence.	Amend the plan as proposed.

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
58- Te Atiawa Trust	Policy 3 – Precautionary approach Amend Policy 3 to read: Adopt a precautionary approach, which may include using an adaptive management approach, where the effects of any activity on the coastal environment are uncertain, unknown, or little understood, but potentially significantly adverse.	Oppose	It doesn't support TEW's precautionary approach at para.16 and para.17 of our evidence.	Retain as notified.
6 – Trans-Tasman Resources Ltd	Policy 5– Appropriate use and development of the coastal environment Amend Policy 5 (b) the benefits to be derived from the activity at a local, regional and national level, including the potential contribution of aquaculture and marine based renewable energy or mineral resources;	Support	Energy resources include both renewable and non-renewable.	Amend the plan as proposed.
6 – Trans-Tasman Resources Ltd	Policy 5– Appropriate use and development of the coastal environment Amend Policy 5(c) to recognise that an alternatives assessment, and the need for an activity to be the best practicable option is not always required, particularly where there are no significant adverse effects.	Oppose	It is good practice to consider alternatives and best practicable options where there are potential adverse effects (significant or otherwise).	Retain as notified.
25 – New Zealand Petroleum and Minerals	Policy 5 – Appropriate use and development of the coastal environment Amend Policy 5(b) to recognise benefits from petroleum and mineral	Support in part	There is some duplication in the wording.	[...] (b) the benefits to be derived from the activity at a local, regional and national level, including the potential contribution of aquaculture and <u>the existing and potential contribution of</u>

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
	resources to read: Determine whether use and development of the coastal environment is in an appropriate place and form and within appropriate limits by having regard to: (a) the functional need for [...] (b) the benefits to be derived from the activity at a local, regional and national level, including the potential contribution of aquaculture and marine based energy resources, <u>and the existing and potential contribution of petroleum and mineral resources</u> ;			marine based energy <u>and mineral</u> resources.
32 – Port Taranaki	Policy 5 – Appropriate use and development of the coastal environment Amend Policy 5(g) to recognise security issues with respect to public access and to read as follows: Determine whether use and development of the coastal environment is in an appropriate place and form and within appropriate limits by having regard to: [...] (g) the degree to which the activity contributes to the enhancement or restoration of public access or public use of the coast including for recreation, <u>unless the type of activity, and the need to maintain public safety, makes enhancement or restoration public access inappropriate</u> ;	Oppose	If the activity does not contribute to enhancement or restoration of public access or public use of the coast including for recreation because of public safety issues this needs to be considered.	Retain as notified.

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
40 – Te Rūnanga o Ngāti Mutunga	<p>Policy 5 – Appropriate use and development of the coastal environment</p> <p>Amend Policy 5(j)(iii) to read: Provide for the integrated management of the coastal environment by: [...] (j)(iii) the efficacy of measures to avoid, remedy or mitigate such effects, or provide environmental compensation where effects cannot be <u>avoided</u>, remedied or mitigated [...]</p>	Oppose	Some effects should not occur (that is they are unacceptable and should be avoided). In these cases it would not be appropriate to offset these with environmental compensation.	Retain as notified.
47 – Fonterra	<p>Policy 7 – Impacts on established operations and activities</p> <p>Amend Policy 7 to read: Avoid, remedy or mitigate the adverse effects <u>reverse sensitivity effects from of new activities, including reverse sensitivity impacts</u>, on existing lawfully established activities.</p>	Oppose	Remedying or mitigating adverse effects of new activities on existing activities is appropriate in some cases.	Retain as notified.
6 – Trans-Tasman Resources Ltd	<p>Policy 8 – Areas of outstanding value</p> <p>Amend Policy 8 to read: Protect the visual quality and the physical, ecological and cultural integrity of coastal areas of outstanding value identified in Schedule 1 from inappropriate use and development by: (a) avoiding adverse effects of activities (<u>other than minor or transitory effects</u>) on the values and characteristics identified in Schedule 2 that contribute to areas: [...]</p>	Oppose	This is inappropriate in Areas of Outstanding Value where the policy states “avoid adverse effects”. There is also no understanding or quantification of what a minor or transitory adverse effect is.	Retain as notified.

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
41 – Te Korowai o Ngāruahine Trust	Policies 8 to 15 – Natural and historic heritage and values Amend Policies 8 to 15 to delete reference to significant adverse effects and replace with <u>adverse effects</u> .	Support	There is no understanding or quantification of what a significant adverse effect is.	Retain as notified.
37 – Petroleum Exploration and Production Association of NZ	Policy 9 – Natural character and natural features and landscapes (iv) is of an appropriate form, scale and design to be sympathetic <u>minimise effects on the character, visual amenity and quality of</u> to the existing landforms, features and vegetation (excluding high visibility markers required for safety or conservation purposes) [...]	Support in part	Agree on using words such as maintain or minimise as PEPANZ suggests. However using the word ‘maintain’ would be more appropriate than minimise as representing the intent of the original wording “be sympathetic”.	(iv) is of an appropriate form, scale and design to be sympathetic <u>maintain the character, visual amenity and quality of</u> to the existing landforms, features and vegetation (excluding high visibility markers required for safety or conservation purposes) [...]
2 – Federated Farmers	Policy 17 – Public access Amend Policy 17 to read: Maintain and as far as practical enhance <u>where a demand exists</u> , public access to, along and adjacent to the coastal environment-marine area , while minimising conflict with other land users by: (a) avoiding, remedying or mitigating any adverse effects of... <u>(x) to maintain a level of security for lawfully established activities, users and management of areas within or adjacent to the coastal marine areas;</u>	Oppose in part	It is unclear: (i) how to determine “where a demand exists”; and (ii) what does “level of security” entail.	Retain as notified.

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
6 – Trans-Tasman Resources Ltd	Policy 20 – Avoidance of increasing coastal hazard or public safety risks Amend Policy 20 to read: Avoid increasing the risk of social, environmental and economic harm from coastal hazards or posing a threat <u>and avoid increased risks to public health and safety, or aircraft or navigation safety including by:[...]</u>	Support	There are 2 aspects to this policy-avoidance of increasing coastal hazard risks <u>and</u> avoidance of increasing risks to public health and safety. The suggested wording reflects both aspects. The use of terms such as “to avoid ” rather than “posing a threat” is appropriate.	Amend the plan as proposed.
6 – Trans-Tasman Resources Ltd	Policy 29 – Impacts from offshore petroleum drilling and production Amend Policy 29 by deleting the reference to petroleum and include all offshore drilling and production to read as follows: Policy 29: impacts from offshore petroleum drilling and production Activities associated with petroleum drilling and production in the coastal marine area will be managed to avoid, remedy or mitigate adverse environmental effects associated with accidental discharges by ensuring: [...]	Oppose	This policy is specifically for petroleum drilling and production.	Retain as notified.
40 – Te Rūnanga o Ngāti Mutunga 41 – Te Korowai o Ngāruahine Trust 58 – Te Atiawa	Policy 29 – Impacts from offshore petroleum drilling and production Amend Policy 29 to read: Activities associated with petroleum drilling and production in the coastal marine area will be managed to avoid, remedy or mitigate adverse environmental effects associated with accidental <u>any</u> discharges by ensuring [...]	Support	All discharges should be considered not only accidental ones.	Amend the plan as proposed.

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
37 – Petroleum Exploration and Production Association of NZ	Policy 32 – Placement of structures Amend Policy 32(f) to read: Structures in the coastal marine area: [...] (f) where appropriate, should be made of, or finished with, materials that are visually and aesthetically compatible with <u>minimise effects on the character and visual amenity</u> of the adjoining coast.	Support in part	Agree on using words such as maintain or minimise as PEPANZ suggests. However using the word ‘maintain’ would be more appropriate than minimise as representing the intent of the original wording are “visually and aesthetically compatible with”.	(f) where appropriate, should be made of, or finished with, materials that <u>maintain the character and visual amenity</u> of the adjoining coast.
37 – Petroleum Exploration and Production Association of NZ	Rule 17 – Other discharges to Support treating flaring as a Discretionary Activity but seek that it be amended or a new rule be included that allows miscellaneous air emissions that have less than minor effects as a Permitted Activity. The submitter highlights such a rule provided in the Greater Wellington Regional Coastal Plan that reads as follows: “The venting of drainage systems, not including the venting of trade wastes or sewage conveyance systems, is a Permitted Activity provided that the discharge complies with the conditions specified below. Conditions (1) The discharge shall not result in odour, gas, vapour or aerosols which are noxious, dangerous, offensive or objectionable to other users of the coastal marine area or adjoining land users as a result of its frequency, intensity or duration.”	Oppose	All air emissions need to be considered as a discretionary activity including flaring and fugitive emissions particularly to consider overall cumulative effects.	Retain as notified.

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
37 – Petroleum Exploration and Production Association of NZ	Rule 26 – Exploration or appraisal of well drilling in the Open Coast or Port Support Rule 26 but amend standard, terms and Condition (a) to read: a) drilling is not undertaken within 2,000 m of any site where drilling has occurred in the previous five years <u>unless the Applicant can show to the satisfaction of Council that drilling within these parameters would avoid any potential cumulative effects [...]</u>	Oppose	If the applicant wishes to drill closer than 2000m then this would fall under Rule 27.	Retain as notified.
43 – Royal Forest and Bird Protection Society	Rule 27 – Exploration or appraisal of well drilling in the Open Coast or Port Amend the Plan to include a policy or definition of temporary occupation	Support	Temporary occupation needs to be defined as to the length of time that is acceptable to be considered “temporary”. For example temporary occupation is defined as four consecutive days in Rule 47. There will be a consequential effect to Rule 26 if the amendment of PEPANZ and Taranaki Regional Council to include “temporary exclusive” is agreed to.	Amend the plan as proposed.
51 – Taranaki Energy Watch	Rule 28 – Exploration or appraisal of well drilling – Outstanding Value, Estuaries Unmodified and Estuaries Modified Amend the Rule 28 to make erection or placement of petroleum production installations in the Outstanding Value, Estuaries Unmodified and Estuaries Modified		There was an error in the text of the summary.	Amend Rule 28 to make exploration or appraisal of well drilling in the Outstanding Value, Estuaries Unmodified and Estuaries Modified coastal management areas a Prohibited Activity (rather than a Non-complying Activity).

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
	coastal management areas a Prohibited Activity (rather than a Non-complying Activity).			
53- Taranaki Regional Council	Paragraph 4 Taranaki Regional Council identifies and makes all consequential amendments to the Proposed Plan Paragraph 5 Taranaki Regional Council audits the Proposed Plan...and that all necessary inconsequential amendments be made.	Comment	As part of the process it is important to identify where the Council has made consequential and inconsequential amendments so that the submitters are aware this has occurred.	

Further Submissions Form – Proposed Coastal Plan for Taranaki

Your details

Name: Joshua K. O'Rourke

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I am or represent an organisation whose interest in the proposal is greater than that of the general public.

PEPANZ represents the New Zealand oil and gas sector, which must comply with the rules in this section that govern its coastal activities. Our sector faces the direct costs of compliance and it is essential that the proposals are workable for our sector.

We wish to be heard in support of our further submission.

PEPANZ Further Submission on the Proposed Taranaki Coastal Plan. 4 August 2018.

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Who made the original submission point?	Please state the original submission point and indicate clearly what part of the proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
Royal Forest and Bird Protection Society	Seeks to remove Objective 3 on Reverse Sensitivity and regionally important infrastructure	Oppose	Because of the significance to economic and social well-being of regionally important infrastructure, it is appropriate to manage reverse sensitivities.	Retain Notified Policy
Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	Amend Objective 13 to read: The risk of social, cultural, environmental, and economic harm from coastal hazards is not increased <u>to unacceptable levels</u> and public health, safety and property is not compromised by use and development of the coastal marine area.	Support	It is appropriate to have a materiality threshold (“unacceptable levels”) to focus attention of important issues.	Insert the wording proposed by the submitter.
Royal Forest and Bird Protection Society	Amend Policy 3 to remove reference to “adaptive management”.	Oppose	We support the ability to use adaptive management where appropriate	Retain the notified policy.
KASM and Greenpeace	The precautionary approach should be applied to objectives, policies and rules in the plan that relate to oil and gas	Oppose	Because oil and gas activities are well-understood and established in the TRC region, it is unnecessary to apply a precautionary approach in all aspects of the plan that relate to oil and gas.	Retain the notified policy.

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Trans-Tasman Resources Ltd	Amend Policy 5(b) to recognise the benefits of mineral resources	Support	Minerals (including petroleum) provide significant local, regional and national benefits which should be considered	Adopt the spirit of TTR's submission on Policy 5(b), noting that NZP&M submitted a similar point with different wording.
New Zealand Petroleum and Minerals	Amend Policy 5(b) to recognise benefits from petroleum and mineral resources	Support	Amend Policy 5(b) to recognise benefits from petroleum and mineral resources to read: Determine whether use and development of the coastal environment is in an appropriate place and form and within appropriate limits by having regard to: (a) the functional need for [...] (b) the benefits to be derived from the activity at a local, regional and national level, including the potential contribution of aquaculture and marine based energy resources, and the existing and potential contribution of petroleum and mineral resources; [...]	Adopt the spirit of NZP&M's submission on Policy 5(b), noting that TTR submitted a similar point with different wording.
New Zealand Petroleum and Minerals	Retain Policy 29 – Impacts from offshore petroleum drilling and production	Support	The current Policy is appropriate	Retain notified wording

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Taranaki Energy Watch	Amend Policy 29 and Rules 26-30 to incorporate a precautionary approach.	Oppose	Because oil and gas activities are well-understood and established in the TRC region, it is unnecessary to apply a precautionary approach in all aspects of the plan that relate to oil and gas	Retain notified wording
Powerco, and Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	Amend Policy 37 to read: Major Alteration or extension of existing lawful structures, including major alterations or extensions, will be allowed in locations where the activity will not have significant adverse effects on other uses and values and will [...]	Support	It makes sense to enable all alterations if the tests in (a) and (b) of Policy 37 are met – not just those that are ‘major’.	Adopt the submitters’ proposed wording.
New Zealand Petroleum and Minerals	Amend Policy 38 to recognise additional considerations and to read as follows: Structures will be removed from the coastal marine area at the expiry of their authorisation or at the end of their useful life, unless one or more of the following applies: [...] (d) the removal of the structure poses unreasonable costs or is technically unfeasible; or (e) the removal of the structure poses unreasonable risk on human health and safety.	Support	We support including these matters for consideration, as it provides greater flexibility and aligns with the International Maritime Organisation’s guidelines on decommissioning.	Include these items but by using the language proposed in the original PEPANZ submission which copies the actual IMO language.

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Trans-Tasman Resources Ltd	Retain Rule 12 noting surveys and tests are important and useful for establishing or monitoring key aspects of the coastal environment and that the effects are minor and transitory.	Support	Seismic surveys provide important data and effects can be managed through the Proposed Plan's conditions	Retain notified wording
Climate Justice Taranaki	[Rule 12] Oppose further petroleum prospecting and exploration and seek that the Plan be amended to make seismic surveying for petroleum in any coastal management area a Prohibited Activity (rather than a Permitted Activity).	Oppose	<p>Seismic surveys are appropriately regulated as Permitted Activity under the proposed conditions.</p> <p>Seismic surveys are a low-impact activity, well suited to standard conditions, and consistently managed across the EEZ in accordance with the DOC code of conduct. Effects from seismic surveys conducted in accordance with the DOC code are minor.</p>	Retain notified rule.
Te Rūnanga o Ngāti Mutunga	Amend Rule 12 to make seismic surveying or bathymetric testing activity a Discretionary Activity (rather than a Permitted Activity) AND Amend Condition (a) to delete reference to "any subsequent applicable Code of Conduct"	Oppose	<p>Seismic surveys are appropriately regulated as Permitted Activity under the proposed conditions.</p> <p>Seismic surveys are a low-impact activity, well suited to standard conditions, and consistently managed across the EEZ in accordance with the DOC code of conduct. Effects from seismic surveys conducted in accordance with the DOC code are minor.</p>	Retain notified rule.

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Te Korowai o Ngāruahine Trust	Amend Rule 12 to require a higher level of regulatory control for seismic surveying or bathymetric testing activity (currently a Permitted Activity).	Oppose	<p>Seismic surveys are appropriately regulated as Permitted Activity under the proposed conditions.</p> <p>Seismic surveys are a low-impact activity, well suited to standard conditions, and consistently managed across the EEZ in accordance with the DOC code of conduct. Effects from seismic surveys conducted in accordance with the DOC code are minor.</p>	Retain notified rule.
Te Korowai o Ngāruahine Trust	Amend Rule 12 to include a standard/term/condition that ensures no adverse effects on the cultural interests of sites specified in Schedule 5B.	Oppose	<p>Seismic surveys are appropriately regulated as Permitted Activity under the proposed conditions.</p> <p>Seismic surveys are a low-impact activity, well suited to standard conditions, and consistently managed across the EEZ in accordance with the DOC code of conduct. Effects from seismic surveys conducted in accordance with the DOC code are minor.</p>	Retain notified rule.
Ngati Hine Hapū of Te Atiawa	Amend Rule 12 to make seismic surveying or bathymetric testing activity a Controlled Activity (rather than a Permitted Activity) and to include iwi/hapū in the consideration process.	Oppose	<p>Seismic surveys are appropriately regulated as Permitted Activity under the proposed conditions.</p> <p>Seismic surveys are a low-impact activity, well suited to standard conditions, and consistently managed across the EEZ in accordance with the</p>	Retain notified rule.

PEPANZ Further Submission on the Proposed Taranaki Coastal Plan. 4 August 2018.

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			DOC code of conduct. Effects from seismic surveys conducted in accordance with the DOC code are minor.	
Royal Forest and Bird Protection Society	Amend Rule 12 to make seismic surveying and bathymetric testing: <ul style="list-style-type: none"> • a Discretionary Activity in the Open Coast and Port • a Non-complying Activity in the Outstanding Value, Estuaries Unmodified and Estuaries Modified coastal management areas (rather than a Permitted Activity). 	Oppose	Seismic surveys are appropriately regulated as Permitted Activity under the proposed conditions. Seismic surveys are a low-impact activity, well suited to standard conditions, and consistently managed across the EEZ in accordance with the DOC code of conduct. Effects from seismic surveys conducted in accordance with the DOC code are minor.	Retain notified rule.
Nga Motu Marine Reserve Society Inc	Amend Rule 12 to require a higher level of regulatory control and prohibit seismic surveying or bathymetric testing activity (currently a Permitted Activity).	Oppose	Seismic surveys are appropriately regulated as Permitted Activity under the proposed conditions. Seismic surveys are a low-impact activity, well suited to standard conditions, and consistently managed across the EEZ in accordance with the DOC code of conduct. Effects from seismic surveys conducted in accordance with the DOC code are minor.	Retain notified rule.

PEPANZ Further Submission on the Proposed Taranaki Coastal Plan. 4 August 2018.

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Taranaki Energy Watch	Amend Rule 12 to incorporate a precautionary approach	Oppose	We consider the DOC Code, which is a condition, is already precautionary so no further changes are needed.	Retain notified rule.
Emily Bailey	Amend Rule 12 so that seismic surveying is a prohibited activity within the coastal environment.	Oppose	<p>Seismic surveys are appropriately regulated as Permitted Activity under the proposed conditions.</p> <p>Seismic surveys are a low-impact activity, well suited to standard conditions, and consistently managed across the EEZ in accordance with the DOC code of conduct. Effects from seismic surveys conducted in accordance with the DOC code are minor.</p>	Retain notified rule.
Kiwis Against Seabed Mining	Oppose Rule 12 in which the Activity Classification for testing and bathymetric testing is a Permitted Activity.	Oppose	<p>Seismic surveys are appropriately regulated as Permitted Activity under the proposed conditions.</p> <p>Seismic surveys are a low-impact activity, well suited to standard conditions, and consistently managed across the EEZ in accordance with the DOC code of conduct. Effects from seismic surveys conducted in accordance with the DOC code are minor.</p>	Retain notified rule.

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Greenpeace	Oppose Rule 12 in which the Activity Classification for testing and bathymetric testing is a Permitted Activity	Oppose	<p>Seismic surveys are appropriately regulated as Permitted Activity under the proposed conditions.</p> <p>Seismic surveys are a low-impact activity, well suited to standard conditions, and consistently managed across the EEZ in accordance with the DOC code of conduct. Effects from seismic surveys conducted in accordance with the DOC code are minor.</p>	Retain notified rule.
Te Atiawa	Amend Rule 12 by changing the Activity Classification to Discretionary Activity (currently a Permitted Activity) to provide iwi the opportunity to be involved in the decision making process and ensure conditions of consent are monitored AND Add a new standard/term/condition to ensure no adverse effects on cultural values associated with sites identified in Schedules 5A and 5B	Oppose	<p>Seismic surveys are appropriately regulated as Permitted Activity under the proposed conditions.</p> <p>Seismic surveys are a low-impact activity, well suited to standard conditions, and consistently managed across the EEZ in accordance with the DOC code of conduct. Effects from seismic surveys conducted in accordance with the DOC code are minor.</p>	Retain notified rule.
Te Rūnanga o Ngāti Ruanui Trust	Amend Rule 12 to make seismic surveying or bathymetric testing activity a Discretionary Activity (rather than a Permitted Activity) and amend standards/terms/conditions	Oppose	<p>Seismic surveys are appropriately regulated as Permitted Activity under the proposed conditions.</p> <p>Seismic surveys are a low-impact activity, well suited to standard conditions, and consistently managed across the EEZ in accordance with the</p>	Retain notified rule.

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			DOC code of conduct. Effects from seismic surveys conducted in accordance with the DOC code are minor.	
Surfbreak Protection Society	[Rule 26] Seek that there be no impacts to surf breaks and that key surfing groups and representative groups be part of any limited notification for discharge or disturbance consent applications with the potential to impact on surf breaks or coastal water.	Oppose	Decisions on notification should not be arbitrarily imposed. Instead, such decisions should be made on the basis of the Assessment of Environmental Effects, and in accordance with the objectives and policies of the Plan and the matters to be considered in section 104 of the Act.	Retain notified rule.
New Zealand Petroleum and Minerals	Retain Rule 26 as notified.	Support	The proposed rule adequately manages effects	Retain notified rule.
Royal Forest and Bird Protection Society	Amend Rule 26 by identifying areas of significant biodiversity and excluding these from this rule.	Oppose	This would add uncertainty, especially in the absence of 1) a definition of "significant biodiversity" and 2) mapped areas. In addition, Rule 26 already includes a condition protecting sensitive marine benthic habitats identified in Schedule 4B, and significant species and ecosystems in Schedule 4A.	Retain notified rule

PEPANZ Further Submission on the Proposed Taranaki Coastal Plan. 4 August 2018.

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Royal Forest and Bird Protection Society	Amend Rule 26 by adding matters of discretion to consider effects on indigenous biodiversity and natural character	Oppose	"Indigenous biodiversity" has no clear meaning and too subjective.	Retain notified rule
Te Rūnanga o Ngāti Ruanui Trust	Amend the standards/terms/conditions of Rule 26 to read: (a) drilling is not undertaken within 2,000 m of any site where drilling has occurred in the previous five years; <u>placement of structure and discharge does not adversely affect the matters/values identified for protection by mana whenua in the cultural impact assessment;</u> (b) drilling is not undertaken directly into or within 1000 m of any sensitive marine benthic habitat identified in Schedule 4B or reef system; <u>discharge complies with tangata whenua indicators referred to in the tangata whenua monitoring plan;</u> (c) drilling is not undertaken within any site identified in Schedule 5 [Historic heritage]; <u>discharge is consistent with iwi management</u>	Oppose	We understand this aspect of the rule in the Proposed Plan (with its 1,000m and 2,000m rules) intends to manage cumulative effects. Any standards/terms/conditions listed need to be certain and enforceable, so it can be clearly determined what comes under controlled status and what does not. The submitter's request does not clearly meet those criteria.	Retain notified rule

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Who made the original submission point?	Please state the original submission point and indicate clearly what part of the proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
	<p>plan.</p> <p>(d) drilling does not have an adverse effect on any threatened or at risk, or regionally distinctive species, or any rare and uncommon ecosystem type including those identified in Schedule 4A [Significant species and ecosystems];</p> <p>(e) drilling is undertaken at least 2,000 m from the line of mean high water springs or at least 1,000 m from the boundary of coastal management area — Outstanding Value;</p> <p>(f) only water-based or synthetic-based drilling fluids and muds are used; and</p> <p>(g) activity complies with the general standards in Section 8.6 of this Plan.</p>			
Taranaki Energy Watch	<p>Amend Rules 26-30 by:</p> <p>Having regard to the Marine Oil Spill Contingency Plan (MOSCP, 2012), in particular Appendix 4. Sensitive Site Coastal Info when considering the rules notification and activity status.</p>	Oppose	<p>The schedules in the Taranaki Coastal Plan identify coastal sites with significant values (for example, Schedule 6 coastal sites with significant amenity values, Schedule 2 areas of Outstanding coastal value). This most recent and updated information in the plan is appropriate.</p>	Retain notified rule
Te Rūnanga o Ngāti Ruanui Trust	<p>Amend Rule 27 to include standards/terms/conditions to read:</p> <p>(a) Exploration or appraisal well drilling does not adversely affect the matters/values identified for protection by mana whenua in the cultural impact assessment;</p> <p>(b) Exploration or appraisal well drilling complies with tangata whenua indicators referred to in the tangata whenua</p>	Oppose	<p>Rule 27 is a discretionary activity, for activities that cannot meet the standards/terms/conditions for Rule 26, and should not contain standards/terms/conditions.</p>	Retain notified rule

PEPANZ Further Submission on the Proposed Taranaki Coastal Plan. 4 August 2018.

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	<p>monitoring plan Exploration or appraisal well drilling in consistent with iwi management plan.</p>			
<p>Royal Forest and Bird Protection Society</p>	<p>Amend Rule 26 by adding a requirement to publicly notify under this rule.</p>	<p>Oppose</p>	<p>Decisions on notification should not be arbitrarily imposed. Instead, such decisions should be made on the basis of the Assessment of Environmental Effects, and in accordance with the objectives and policies of the Plan and the matters to be considered in section 104 of the Act.</p>	<p>Retain notified rule</p>
<p>Taranaki Energy Watch</p>	<p>Amend Rules 26-30 by adding a requirement to publically notify under these rules.</p>	<p>Oppose</p>	<p>Decisions on notification should not be arbitrarily imposed. Instead, such decisions should be made on the basis of the Assessment of Environmental Effects, and in accordance with the objectives and policies of the Plan and the matters to be considered in section 104 of the Act.</p>	<p>Retain notified rule</p>
<p>Te Rūnanga o Ngāti Ruanui Trust</p>	<p>Amend Rule 26 by including the following notification note: Resource consent applications under this Rule will be notified to tangata whenua.</p>	<p>Oppose</p>	<p>Decisions on notification should not be arbitrarily imposed. Instead, such decisions should be made on the basis of the Assessment of Environmental Effects, and in accordance with the objectives and policies of the Plan and the matters to be considered in section 104 of the Act.</p>	<p>Retain notified rule</p>

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Te Rūnanga o Ngāti Mutunga	Amend Rule 26 to make exploration or appraisal of well drilling a Discretionary Activity (rather than Controlled Activity) AND Amend Conditions (c) and (e) to read: (c) Drilling is not undertaken within in the <u>airspace above any site and to the centre of the earth below</u> any site identified in Schedule 5 [...] (e) Drilling is undertaken at least 2,000 m <u>6,000 m</u> from the line of mean high water springs [...]	Oppose	<p>The proposed controlled status for exploration and appraisal and conditions are appropriate.</p> <p>The nature and effects of exploration is well-understood in the region and local environments. The conditions proposed will manage the effects (which are localised) and risks in a proportionate way to the effects and short-duration and transient nature of exploration.</p>	Retain notified rule
Te Atiawa	Amend Rule 26 to change the Activity Classification to Discretionary Activity (rather than a Controlled Activity).	Oppose	<p>The proposed controlled status for exploration and appraisal and conditions are appropriate.</p> <p>The nature and effects of exploration is well-understood in the region and local environments. The conditions proposed will manage the effects (which are localised) and risks in a proportionate way to the effects and short-duration and transient nature of exploration.</p>	Retain notified rule

PEPANZ Further Submission on the Proposed Taranaki Coastal Plan. 4 August 2018.

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
Te Rūnanga o Ngāti Ruanui Trust	Amend Rule 26 by amending the Activity Classification to make exploration or appraisal of well drilling a Discretionary Activity (rather than a Controlled Activity)	Oppose	<p>The proposed controlled status for exploration and appraisal and conditions are appropriate.</p> <p>The nature and effects of exploration is well-understood in the region and local environments. The conditions proposed will manage the effects (which are localised) and risks in a proportionate way to the effects and short-duration and transient nature of exploration.</p>	Retain notified rule
Royal Forest and Bird Protection Society	Amend Rule 26 by amending the Activity classification to make exploration or appraisal of well drilling a Restricted Discretionary Activity (rather than a Controlled Activity).	Oppose	<p>The proposed controlled status for exploration and appraisal and conditions are appropriate.</p> <p>The nature and effects of exploration is well-understood in the region and local environments. The conditions proposed will manage the effects (which are localised) and risks in a proportionate way to the effects and short-duration and transient nature of exploration.</p>	Retain notified rule.
Greenpeace	Amend so that Rules 26 to 30 have, at minimum, a Discretionary Activity classification.	Oppose	<p>The proposed controlled status for exploration and appraisal and conditions are appropriate.</p> <p>The nature and effects of exploration is well-understood in the region and local environments. The conditions proposed will manage the effects (which are localised) and risks in a proportionate way to the effects and short-duration</p>	Retain notified rules.

PEPANZ Further Submission on the Proposed Taranaki Coastal Plan. 4 August 2018.

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
			and transient nature of exploration.	
Te Atiawa	Amend Conditions (e) of Rule 26 to read as follows: (e) drilling is undertaken at least 2,000 m 6,000m from the line of mean high water springs [...].	Oppose	Any setback distances beyond those in the Proposed Plan should be informed on a case-by-case basis by the Assessment of Environmental Effects, and not arbitrarily in the plan.	Retain notified rule.
Te Kaahui o Rauru	Amend the Activity Classification of Rule 26 by removing the Controlled Activity classification.	Oppose	<p>We understand the submitter wishes to see Rule 26 activities default to discretionary.</p> <p>The proposed controlled status for exploration and appraisal and conditions are appropriate.</p> <p>The nature and effects of exploration is well-understood in the region and local environments. The conditions proposed will manage the effects (which are localised) and risks in a proportionate way to the effects and short-duration and transient nature of exploration.</p>	Retain notified rule.

PEPANZ Further Submission on the Proposed Taranaki Coastal Plan. 4 August 2018.

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
Taranaki Energy Watch	<p>Seek that rules relating to exploration drilling address separation distances on a case by case basis and as recommended in the Cawthron buffer distances report. Amend the Activity Classification of Rule 26 to make exploration or appraisal of well a:</p> <ul style="list-style-type: none"> • Discretionary Activity (rather than a Controlled Activity) in the CMA • Non-complying activity in Open Coast, Estuaries Modified and Port coastal management areas • Prohibited Activity in the Outstanding Value and Estuaries Unmodified coastal management areas 	Oppose	<p>The proposed controlled status for exploration and appraisal and conditions are appropriate.</p> <p>The nature and effects of exploration is well-understood in the region and local environments. The conditions proposed will manage the effects (which are localised) and risks in a proportionate way to the effects and short-duration and transient nature of exploration.</p>	Retain notified rule.
Taranaki Energy Watch	Amend Rule 26 to identifying how many exploration wells can be drilled by a company as part of “exploration and appraisal well drilling”. In cases where more than one exploration well is drilled indicate how this will affect the buffer zone area.	Oppose	<p>Decisions on drilling wells exploration wells may reflect legal obligations in exploration permits under the Crown Minerals Act 1991 amongst other complex factors.</p> <p>It would be improper to dictate, through arbitrary caps on the number of wells, complex discretionary issues as to how permit holders comply with obligations under other legislation.</p>	Retain notified rule.

PEPANZ Further Submission on the Proposed Taranaki Coastal Plan. 4 August 2018.

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
Trans-Tasman Resources Ltd	Amend Plan to include new rule 26A to explicitly address disturbance of the seabed by drilling, which would read as follows:	Neutral, but the submitter's proposal needs to be worded more clearly	If the Council is minded to adopt Trans-Tasman Resources Ltd submission for a separate rule for drilling for core samples of seabed minerals (excluding petroleum), then it should be very clearly differentiated from petroleum rules.	TTR's proposed wording of 'drilling' is unlikely to be adequately differentiated from petroleum exploration drilling, so if the TTR proposal is adopted, it should say "exploratory drilling for seabed minerals excluding petroleum".
Climate Justice Taranaki	Seek that drilling of any petroleum exploration or appraisal well and associated activities in the CMA be a Prohibited Activity	Oppose	<p>The proposed rules 26 and 27 with controlled and discretionary status for exploration and appraisal and conditions are appropriate.</p> <p>The nature and effects of exploration is well-understood in the region and local environments. The conditions proposed will manage the effects (which are localised) and risks in a proportionate way to the effects and short-duration and transient nature of exploration.</p> <p>Prohibited classification should be reserved for activities with effects that are either highly uncertain or extremely negative. Petroleum production fits neither of these categories, and due to the very high economic value of the activity from a small footprint it is appropriate to allow case-by-case applications.</p>	Retain notified rule.

PEPANZ Further Submission on the Proposed Taranaki Coastal Plan. 4 August 2018.

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
Kiwis Against Seabed Mining	Amend the Plan so that Rules 26 to 30 have, at minimum, a Discretionary Activity classification and that areas with higher natural and cultural values are either a Non-complying Activity or Prohibited Activity.	Oppose	<p>The proposed status and conditions for activities under Rules 26-30 are appropriate.</p> <p>The nature and effects of exploration is well-understood in the region and local environments. The conditions proposed will manage the effects (which are localised) and risks in a proportionate way to the effects and short-duration and transient nature of exploration.</p> <p>Prohibited classification should be reserved for activities with effects that are either highly uncertain or extremely negative. Petroleum production fits neither of these categories, and due to the very high economic value of the activity from a small footprint it is appropriate to allow case-by-case applications.</p>	Retain notified rule.
Climate Justice Taranaki	<p>[Rules 29 and 30] Oppose the drilling of new production wells but would support provisions for the maintenance and occupation of space by existing wells and associated infrastructure. If any new production wells are to be drilled, then prudent buffer distances should apply.</p> <p>Support provisions for the maintenance and occupation of space by existing wells and associated infrastructure but seek that: the setback distance from sensitive marine</p>	Oppose	<p>New production wells should be allowed, on the basis that effects can be managed well, and that the economic and social benefits are significant.</p> <p>Production is appropriately managed through consents, to account for case-by-case impacts of a long-term activity. Increasing the classification to non-complying or prohibited is unnecessary given the known impacts and ability to</p>	Retain notified rule.

PEPANZ Further Submission on the Proposed Taranaki Coastal Plan. 4 August 2018.

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
	benthic habitat (Schedule 4B), reef system or boundary of CMA Outstanding Value be at least 6,000 m.		<p>manage them through standard consent processes.</p> <p>Any setback distances should be informed on a case-by-case basis by the Assessment of Environmental Effects, and not arbitrarily in the plan.</p>	
<p>Climate Justice Taranaki</p> <p>And</p> <p>Royal Forest and Bird Protection Society</p> <p>And</p> <p>Taranaki Energy Watch</p>	<p>Amend Rule 30 [Petroleum production installation erection or placement – Outstanding Value, Estuaries Unmodified and Estuaries Modified] to be a Prohibited Activity (rather than a Non-complying).</p>	<p>Oppose</p>	<p>Production is appropriately managed through consents, to account for case-by-case impacts of a long-term activity. Increasing the classification to non-complying or prohibited is unnecessary given the known impacts and ability to manage them through standard consent processes.</p> <p>Prohibited classification should be reserved for activities with effects that are either highly uncertain or extremely negative. Petroleum production fits neither of these categories, and due to the very high economic value of the activity from a small footprint it is appropriate to allow case-by-case applications under a non-complying classification.</p>	<p>Retain the notified rule.</p>

PEPANZ Further Submission on the Proposed Taranaki Coastal Plan. 4 August 2018.

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
Te Rūnanga o Ngāti Mutunga And Te Atiawa	Retain Rule 30 as notified	Support	A non-complying rule in areas of outstanding value is appropriate. Due to the very high economic value of the activity from a small footprint it is appropriate to allow case-by-case applications under a non-complying classification.	Retain the notified rule as per the submitter's request.
Royal Forest and Bird Protection Society	Amend the Plan to include a policy or definition of temporary occupation	Neutral	General interest because we are a sector that engages in temporary occupation	If adopted, we would like to be engaged as the industry association representing the sector that Forest and Bird's submission would affect
Powerco, and Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	Amend the definition of maintenance of structures to broaden it	Support with amendment	The current definition is applicable to structures such as a seawall, but do not easily allow maintenance of devices or equipment associated with petroleum operations. Because petroleum wells are structures, the definition of maintenance should enable appropriate maintenance.	Include in the definition the following concepts (construction, operation, maintenance, modification) to cover the following rules: Rules 26-27 (exploration and appraisal drilling) should read:(a) <u>construction, operation, maintenance and abandonment</u> Rule 28 (production well drilling) should read(a) <u>construction, operation, maintenance, modification and abandonment</u>

Further Submissions Form – Proposed Coastal Plan for Taranaki

Use this form for multiple further submissions on the Proposed Coastal Plan for Taranaki.

Important:

- Further submissions can be made only by a person/organisation representing a relevant aspect of the public interest, or a person/organisation whose interest in the proposal is greater than that of the general public
- Further submissions can only be made in support or opposition of an existing submission and must not raise any new points.
- You are obliged to notify the original submitters to whom your further submissions relate. [Find their email address here](#)

Email your further submissions to coastal@trc.govt.nz with 'Proposed Coastal Plan further submission' in the subject field.

Submissions close at 4pm on Saturday 4 August 2018

Your details

Name: _ Elise Smith_____ Organisation (if applicable): Nga Motu Marine Reserve Society Inc.

Address: 320B Frankley Road, New Plymouth

Daytime phone number: 0211293393 Email address: seasense@seasense.org.nz

Select one status:

I am or represent a person/organisation representing a relevant aspect of the public interest YES/NO

I am or represent a person/organisation whose interest in the proposal is greater than that of the general public YES/NO

Explain why you claim this status: The Nga Motu Marine Reserve Society has 21 years of advocating for stewardship of the marine and coastal area in Taranaki. The Objectives of the Society are;

- a) To establish a network of marine reserves in the Taranaki Region
- b) To ensure the marine life and other natural resources in the region are protected

- c) To encourage the scientific study of marine life on the Taranaki coast
- d) To foster community awareness of the coastal environment by education.

Do you wish to be heard in support of your further submission? YES

Who made the original submission point?	Please state the original submission point and indicate clearly what part of the proposed Plan it relates to.	Do you oppose or support the original point?	What are the reasons for your response?	What relief would you like to see?
Karen Pratt	<p><i>ONC-6 'Project Reef' on page 129, Schedule 2 of the Draft Coastal Plan</i></p> <p><i>Policy 28 (a)-(d) Harmful aquatic organisms</i></p> <p><i>Policy 44: Extraction or deposition of material .</i></p> <p><i>Policy 49: Noise and vibration</i></p>	<p><i>Support</i></p> <p><i>Support</i></p> <p><i>Support</i></p> <p><i>Support</i></p>	<p><i>An important and representative area which now has some baseline data and ongoing research</i></p> <p><i>Agree that the plan should include ballast water in Policy 28 (a)-(d) Harmful aquatic organisms.</i></p> <p><i>Extraction or deposition of material. The effects of the deposition from ironsand mining cannot be understood due to gaps in the information about the area.</i></p> <p><i>Noise and vibration from ironsand mining will affect organisms within the TRC area of jurisdiction</i></p>	<p><i>Inclusion of the reef</i></p> <p><i>Ballast water should be included</i></p> <p><i>The area is inadequately mapped and recorded and this needs to be done.</i></p> <p><i>A rethinking of what 'population level' actually means, and the effects of noise on marine mammals.</i></p>
Richard J Guy South Taranaki Underwater Club	<i>ONC-6 'Project Reef' on page 129, Schedule 2 of the Draft Coastal Plan</i>	<i>Support</i>	<i>An important and representative area which now has some baseline data and ongoing research</i>	<i>Inclusion of the reef</i>
Bruce Boyd	<i>ONC-6 'Project Reef' on page 129, Schedule 2 of the Draft Coastal Plan</i>	<i>Support</i>	<i>An important and representative area which now has some baseline data and ongoing research</i>	<i>Inclusion of the reef</i>
Trans Tasman Resources	<i>ONC-6 'Project Reef' on page 129, Schedule 2 of the Draft Coastal Plan</i>	<i>Disagree</i>	The statement that " there is not enough evidence" is unfounded. The images used by the TRTR in their sandmining application were not representative, and they do not have the grounds to say this.	The reef should be included.



**Te Rūnanga o Ngāti Ruanui Trust's
Further Submission on the Proposed Coastal Plan for Taranaki
3 August 2018**



Plan reference	Submitter	Further submission	Reasons for further submission
3.2 Plan Introduction or Background			
Section 3.1 – Taranaki coastal environment	6 – Trans-Tasman Resources Ltd	Oppose	<p>>Although the Plan recognises that Taranaki is a mineral producing region to New Zealand, it is important to emphasise that the effects of extracting these minerals (in the case of the submitter – iron sand) are detrimental to the coastal environment.</p> <p>>Our overall submission, refers to the inclusion of stringent measures including active participation of mana whenua, identification of significant sites, etc. We believe that this will ensure equitable and sustainable management of NZ's resources in the coastal environment (includes the coastal marine area).</p>
	7 – Waikato Regional Council	Support	<p>>Amend Section 3.1 (or Policy 2 or similar relief) to acknowledge that activities outside of the CMA can have an effect on the Coastal Marine Area (CMA).</p> <p>>We agree with the submitter. Cross-boundary effects of activities outside the CMA should be included with the Plan. Effects that are more than minor should require resource consent under the RMA.</p>
	21 – Climate Justice Taranaki	Support	<p>>Amend page 13 [Appropriate use and development] of the Plan to note central government's recent announcement that there will be no new offshore oil and gas exploration permits and it will be restricting new permits to only onshore Taranaki over the next three years.</p> <p>>We agree with the submitter. The Plan did not adequately reflect the government's stance to halt new offshore oil and gas exploration.</p>
	40 – Te Rūnanga o Ngāti Mutunga	Support	<p>>'...(but are not convinced integrated management is reflected in the rules of the Plan).'</p> <p>>This is similar to our analysis of the proposed Plan. We request that the council address this.</p>



	41 – Te Korowai o Ngāruahine Trust	Support	<p>>Amend Section 3.1 of the Plan to broaden the information, including reference the tauranga waka landing sites and the statutory acknowledgements that iwi have over a number of rivers and tributaries and land areas within the CMA environment, to promote readers' awareness and knowledge about the depth of relationship that Māori have with the coast.</p> <p>>This is the same as what we have raised in our submission.</p>
	43 – Royal Forest and Bird Protection Society	Support	<p>>Amend Section 3.1 of the Plan by:</p> <ul style="list-style-type: none"> -amending the third paragraph to recognise existing pressures on the coastal environment, including from beyond the CMA, and that low current demand does not mean management of effects can be relaxed -amend the text under "Integrated management" to recognise: the effects of subdivision, use and development on land in the coastal environment on the CMA; that demand for activities in this area is high; the need to provide for migration of coastal habitat landward as a result of climate change. <p>>This is similar to our stance with respect to the inclusion of effects arising from activities outside the CMA and strengthening 'integrated management' to link RMA with Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012 (EEZ Act).</p>
	58 – Te Atiawa	Support	<p>>Amend Section 3.2.6 to read: Ensuring people can continue to access, use and enjoy the Taranaki Coast <i>where cultural values are not adversely impacted upon</i>.</p> <p>>This is similar to our submission.</p>
Section 3.2 – Managing the Taranaki coastal environment	6 – Trans-Tasman Resources Ltd	Oppose	<p>>Retain objectives, policies, rules and methods that recognise and provide for appropriate use and development of natural resources (which under the RMA includes minerals) within the coastal environment.</p> <p>>Such objectives, policies, rules and methods that recognise and provide for appropriate use and development of natural resources within the coastal environment need to be amended to safeguard NZ's minerals from being exploited. Stringent rules and methods should be in place.</p> <p>>We request that section 3.2 be amended according to our submission. Submitters 40, 57 and 58 submission are similar to our stance.</p>



	46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	Oppose	<p>>Amend section 3.1 to include <i>‘It is important that use and development of the coastal marine area does not increase coastal hazard risk to people or property to unacceptable levels.’</i></p> <p>>The use of ‘unacceptable levels’ are difficult to ascertain and would not be consistent with Mātauranga Māori (Māori worldview) which includes tangible and intangible matters (cannot be measured).</p> <p>>We would support the inclusion of Mātauranga Māori with these words.</p>
	40 – Te Rūnanga o Ngāti Mutunga	Support	<p>>Amend point 6 to include <i>‘6. Ensuring people can continue to access, use and enjoy the Taranaki Coast where cultural and ecological values are not adversely impacted upon. [...]’</i></p> <p>>The inclusion of the above would that tangata whenua’s culture and traditions are not adversely impacted. This is similar to our submission.</p>
	58 – Te Atiawa	Support	<p>> Amend Section 3.2.6 to read: <i>‘Ensuring people can continue to access, use and enjoy the Taranaki Coast where cultural values are not adversely impacted upon.’</i></p> <p>>The same as above</p>
3.3 Plan Objectives			
Objective 1 – Integrated management	6 – Trans-Tasman Resources Ltd	Oppose	<p>>Retain Objective 1 as notified.</p> <p>>We request that Objective 1 be amended to reflect the requests of submitters 19 and 43. This would ensure adequate integrated management between local and iwi authorities.</p>
	19 – South Taranaki District Council	Support	<p>>Amend Objective 1 to add reference to working cooperatively with the territorial local authorities and iwi of the region.</p> <p>>Refer to our comments above.</p>
	43 – Royal Forest and Bird Protection Society	Support	<p>>Amend Objective 1 to read: Management of the coastal environment, including the effects of subdivision, use and development on land, air and fresh water, is carried out in an integrated manner, including between regional and district council functions.</p> <p>>Refer to our comments above.</p>
Objective 3 – Reverse sensitivity	43 – Royal Forest and Bird Protection Society	Support	<p>>Amend the Plan by deleting Objective 3: The use and ongoing operation of nationally and regionally important infrastructure and other existing lawfully</p>



			<p>established activities is protected from new or inappropriate use and development in the coastal environment.</p> <p>>We agree that Objective 3 should be deleted or at least amended to remove the word 'new'. In our view, reverse sensitivity should not focus solely on allowing infrastructure/industries to operate without considering effects of these activities on future activities allowed as of right in the zone.</p> <p>>We recommend that the TRC consider the consequences of allowing (require resource consent) such infrastructure on future permitted activities.</p>
Objective 5 – Coastal water quality	29 – Department of Conservation	Support	<p>>Amend Objective 5 to read: <i>Water quality in the coastal environment is maintained and enhanced and where quality of water in the coastal environment has deteriorated, restore where practicable.</i></p> <p>>We support the restoration of the coastal environment where water quality has deteriorated.</p>
	46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	Oppose	<p>>Retain Objective 5 as notified.</p> <p>>We request that Objective 5 be amended to include mauri values. For Ngati Ruanui, the inclusion of mauri values and cultural perspectives with Objective 5 will provide for a combined science and cultural framework. This combined framework will help mana whenua articulate the way they interpret their environment (both natural and human-modified ecosystems), the issues they contend with, how they assess effects, how they measure change, and how they process information and arrive at decisions.</p> <p>> The amended objective will align with Policy 11 which seeks to maintain and enhance coastal water quality by avoiding, remedying and mitigating the adverse effects of activities on, and in particular, the mauri and wairua of coastal water. Rules and methods could be used to reflect and complement the māori and scientific framework/approach and to support cultural impact assessments and long-term monitoring programmes.</p>
	48 – Taranaki District Health Board	Oppose	<p>>Retain Objective 5 as notified.</p> <p>> Refer to our comments above.</p>



Objective 11 – Historic heritage	57 – Heritage New Zealand	Support	<p>>Amend Objective 11 to include “and the extensive but limited knowledge of historic heritage in the coastal environment is recognised.”</p> <p>> Besides Historic heritage, we recommend the inclusion of cultural heritage.</p> <p>>As a matter of national importance, RMA policy and plans must address a number of key matters in order to protect cultural and historic heritage. This includes (but not limited to) identification of cultural places and sites of significance to tangata whenua (incorporating tangible and intangible cultural heritage), assessment of their values, regulatory controls, and mapping. We argue that the Plan and policy statements developed under the RMA should adopt ‘cultural heritage’ in accordance with Part 2 of the RMA. This is to ensure the appropriate integration of tangible and intangible matters with current historic heritage approach which is mainly weighted on ‘the tangibles’.</p>
Objective 12 – Public use and enjoyment	40 – Te Rūnanga o Ngāti Mutunga	Support	<p>>Amend Objective 12 to read: People’s use and enjoyment of the coastal environment, including amenity values, traditional practices and public access to and within the coastal environment is maintained and enhanced <i>without adversely impacting on cultural and environmental values</i>.</p> <p>>Inclusion of these words will ensure that use and enjoyment of the coastal environment will not adversely impact on cultural, environmental and historic values.</p>
	41 – Te Korowai o Ngāruahine Trust	Support	<p>>Amend Objective 12 to include: “<i>without adversely impacting on cultural and historic values.</i>”</p> <p>>same as above.</p>
Objective 13 – Coastal hazards risk and public health and safety	46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	Oppose	<p>>Amend Objective 13 to include ‘unacceptable levels’.</p> <p>>The use of ‘unacceptable levels’ are difficult to ascertain and would not be consistent with Mātauranga Māori (Māori worldview) which includes tangible (measurable) and intangible matters (cannot be measured).</p> <p>>We would support the inclusion of Mātauranga Māori with these words.</p>
3.4 Plan Policies			
Section 5 – Preamble	57 – Heritage New Zealand	Support	<p>>We support the inclusion of ‘<i>Relationship of Māori and their culture and traditions with the coastal environment.</i>’</p>



Policy 1 – Coastal management areas	45 – Powerco	Oppose	<p>>Amend policies 1(a), 1(b) and 1(c) to read: These areas may contain regionally important infrastructure.</p> <p>>We recommend that regionally important infrastructure should not be located in areas of Outstanding and Cultural Values including estuaries. The Plan should identify appropriate areas for this infrastructure (excluding outstanding values, culturally significant areas, etc). One way is to apply spatial planning.</p> <p>>We request that the submission be declined.</p>
	46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	Oppose	<p>>Amend policies 1(a), 1(b) and 1(c) to read: These areas may contain regionally important infrastructure.</p> <p>>Refer to the above comments.</p>
	28 – Grant Knuckey	Support	<p>>Amend Policy 1 by incorporating mana whenua values and identify Wahi Tapu Areas and Wahi Taonga Areas</p> <p>>This will ensure that effects on mana whenua values, wahi tapu and taonga areas are not more than minor.</p>
	29 – Department of Conservation	Support	<p>>Amend Policy 1(d) [Open Coast] to include a new characteristic to read: v) provide important habitats for marine species.</p> <p>>It is important to provide habitats for marine species.</p>
	40 – Te Rūnanga o Ngāti Mutunga	Support	>Amend Policy 1(b) and (c) to include “valued by Māori for Mahinga Kai.”
	41 – Te Korowai o Ngāruahine Trust	Support	>Amend Policy 1 to recognise the place of marine spatial planning and ecosystem-based management and other associated environmental and kaitiaki plans and recognise Māori values within each of the coastal management areas.
	58 – Te Atiawa	Support	>Amend Policy 1(b) and (c) to include “valued by Māori for Mahinga Kai.”
Policy 3 – Precautionary approach	55 –Kiwis Against Seabed Mining	Support	>Note that the precautionary approach should be applied to objectives, policies and rules in the plan that relate to oil and gas, fishing and seabed mining activities.
	56 – Greenpeace	Support	>Note that the precautionary approach should be applied to objectives, policies and rules in the plan that relate to oil and gas, fishing and seabed mining activities.
	43 – Royal Forest and Bird Protection Society	Support	>Reword Policy 3 to give effect to Policy 3 of the NZCPS by including reference to the effects of climate change.



Policy 4 – Extent and characteristics of the coastal environment	45 – Powerco	Oppose	<p>>Amend Plan by deleting Policy 4 and referring to a comprehensive map of the coastal environment in its place.</p> <p>>In our view, it would be more beneficial and practical for Plan users to retain Policy 4 with reference to a comprehensive map capturing the extent of the coastal environment.</p> <p>>We request that the submission be declined.</p>
Policy 5– Appropriate use and development of the coastal environment	6 – Trans-Tasman Resources Ltd	Oppose	<p>>Amend Policy 5(b), (e), (f) and (g) to delete renewable and to include the word ‘mineral’ with resources.</p> <p>>This is inconsistent with the government’s drive and goals towards 100% renewable energy and zero carbon emission.</p> <p>>The inclusion of the word ‘mineral’ will limit the scope of resources on minerals.</p> <p>>We request that the submission be declined.</p>
	25 – New Zealand Petroleum and Minerals	Oppose	<p>>Amend Policy 5(b) to recognise benefits from petroleum and mineral resources to include: <i>“and the existing and potential contribution of petroleum and mineral resources”</i></p> <p>>This is inconsistent with the government’s decision to halt new oil and gas exploration permits and goals to transition to renewable energy.</p> <p>>We request that the submission be declined.</p>
	26 – Transpower NZ Ltd	Oppose	<p>>Amend Policy 5(a) by deleting the words: <i>“conversely, activities that do not have a functional need to be located in the coastal marine area should not be located there (unless the non-marine related activity complements the intended use and function of the area)”</i> [...]; inclusion of the words <i>“or technical, operational and/or locational requirement”</i></p> <p>>We view this submission as weighted more on allowing infrastructure to locate to the CMA.</p> <p>>We request that the submission be declined.</p>
Policy 8 – Areas of outstanding value	2 – Federated Farmers	Oppose	<p>>Policy 8(b) be deleted. <i>Significant seascapes and visual corridors associated with outstanding natural features and landscapes, including views should be maintained.</i></p>



			>Allowing the submission will remove considerations on significant seascapes and visual corridors. >We request that the submission be declined.
	6 – Trans-Tasman Resources Ltd	Oppose	>Amend Policy 8 to include:” (other than minor or transitory effects)” > The inclusion of the words “minor or transitory effects” is not consistent with the meaning of <i>effect</i> under section 3 of the RMA. >We request that the submission be declined.
	45 – Powerco	Oppose	>Amend Policy 8 by adding a new Clause (c) to read: (c) recognising the need to provide for the ongoing operation, maintenance, and upgrade of existing infrastructure. >We recommend that regionally important infrastructure should not be located in areas of Outstanding and Cultural Values including estuaries. The Plan should identify appropriate areas for this infrastructure (excluding outstanding values, culturally significant areas, etc). One way is to apply spatial planning. >We request that the submission be declined.
	46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	Oppose	>same as above
Policies 8 to 15 – Natural and historic heritage and values	41 – Te Korowai o Ngāruahine Trust	Support	>Amend Policies 8 to 15 to delete reference to significant adverse effects and replace with adverse effects.
Policy 9 – Natural character and natural features and landscapes	20 – Meridian Energy Ltd	Oppose	>Amend Policy 9(a)(i) and delete Clause (vi) maintains the integrity of historic heritage. >Allowing the submission will remove consideration of effects on the integrity of New Zealand’s historic heritage. >We request that the submission be declined.
	45 – Powerco	Oppose	>Amend Policy 9 by adding a new Clause (ix) to read: (ix) is necessary to provide for the safe and efficient operation, maintenance, upgrade and development of regionally important infrastructure.



			<p>>We recommend that regionally important infrastructure should not be located in areas of Outstanding and Cultural Values including estuaries. In our view, the Plan should identify appropriate areas for this infrastructure (excluding outstanding values, culturally significant areas, etc) to be established. One way is to apply spatial planning.</p> <p>>We request that the submission be declined.</p>
	46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	Oppose	>Same as above.
	58 – Te Atiawa	Support	<p>>Amend Policy 9 by amending clause (vi) to include the word ‘cultural’.</p> <p>>Policy 9 seeks to protect all other areas of the coastal environment not identified in Schedule 2 by avoiding significant adverse effects, and avoiding, remedying and mitigating other adverse effects on natural character and features and landscapes by having regard to the extent to which the activity, and in particular, maintains the integrity of historic heritage. We request that the TRC include the word cultural with historic heritage (refer to bold and underlined words) to provide consistency as mentioned on our submission.</p>
Policy 11 – Coastal water quality	6 – Trans-Tasman Resources Ltd	Oppose	<p>>Amend Policy 11 to replace ‘and’ with ‘or’.</p> <p>>We request that Policy 11 be retained. We should aim to maintain <u>and</u> enhance coastal water quality.</p>
Policy 13 – Coastal air quality	6 – Trans-Tasman Resources Ltd	Oppose	<p>>Amend Policy 13 to replace and with or.</p> <p>>We request that Policy 11 be retained. We should aim to maintain <u>and</u> enhance coastal air quality.</p>
Policy 14 – Indigenous biodiversity	6 – Trans-Tasman Resources Ltd	Oppose	<p>>Amend Policy 14 to include the word ‘(declining)’ and to delete ‘or regionally distinctive’ and ‘or are naturally rare’ in (i) and (iii) respectively. Delete the words ‘sensitive marine benthic habitats as identified in Schedule 4B’ in (iii).</p> <p>>The inclusion of (declining) with (i) will not capture species under other conservation status: at risk indigenous species: declining, recovering, relict, and naturally uncommon.</p>



			<p>>Deleting the words 'regionally distinctive' will remove considerations on the effects of activities on indigenous species that are important to our region.</p> <p>>Naturally rare species fall under the 'at risk' conservation status and therefore, should not be deleted.</p> <p>>'Sensitive marine benthic habitats as identified in Schedule 4B' are very important habitats that are vulnerable to seabed mining operations. These words should be retained.</p> <p>>We request that the submission be declined.</p>
	26 – Transpower NZ Ltd	Oppose	<p>>Amend Policy14(b)v to include: unless following a route, site and method selection process, the activity is necessary for the provision of regionally important infrastructure, avoidance of adverse effects is not practicable and adverse effects are remedied or mitigated to the extent reasonably practicable;</p> <p>>We request that the submission be declined.</p>
	28 – Grant Knuckey	Support	<p>>Amend Policy 14 to refer to the maintenance, enhancement and restoration of the mauri of Wahi Tapu and Wahi Taonga areas.</p>
	40 – Te Rūnanga o Ngāti Mutunga	Support	<p>>Amend Policy14(a) to include:</p> <p>(vii) Taonga species as identified by tangata whenua</p> <p>(c) recognising and providing for the role of tangata whenua as kaitiaki, when identifying and managing significant areas of indigenous biodiversity in the coastal area.</p>
	41 – Te Korowai o Ngāruahine Trust	Support	<p>>Amend Policy 14 by: referencing Schedule 5B of the Plan; and expanding the scope of the Policy to also address taonga species.</p>
	58 – Te Atiawa	Support	<p>>same as submitter 40.</p>
	60 – Te Kaahui o Rauru	Support	<p>>Amend Policy 14 to include native species of value to Māori.</p>
Policy 15 – Historic heritage	40 – Te Rūnanga o Ngāti Mutunga	Support	<p>>Amend Policy 15 by removing the word 'significant'.</p>
	58 – Te Atiawa	Support	<p>>same as submitter 40.</p>
	41 – Te Korowai o Ngāruahine Trust	Support	<p>>Amend Policy 15(d) to specifically recognise the role of kaitiaki and mātauranga supplied by tangata whenua/mana whenua and their experts.</p>



Policy 16 – Relationship of tangata whenua	6 – Trans-Tasman Resources Ltd	Oppose	<p>>Delete the word ‘involving’ in (j) and replace this with ‘taking into account’; delete ‘in the development of’ and replace this with ‘on any relevant proposed’.</p> <p>>The proposed changes are inconsistent with mana whenua’s kaitiaki responsibilities, ‘iwi participation’ and the Treaty of Waitangi.</p> <p>>Ngati Makino Heritage Trust v Bay of Plenty Regional Council [2014] NZEnvC 25 case law reiterates the need to ‘articulate the recognition of māori values and to provide for māori participation in the management of resources. The Court accepted that tangata whenua involvement was necessary for determining cultural values and uses for the purposes of allocation and that policies and plans should accommodate this.</p> <p>> To provide for tangata whenua participation, we recommend that Policy 16 be amended to clearly articulate tangata whenua participation and to list existing formal relationships between tangata whenua and councils (include reference to agreement document). Besides Mana Whakahono a Rohe/Iwi Participation Arrangements, this includes (but not limited to) Transfer of Powers under section 33 of the RMA, Memoranda of Understanding, co-management agreements, specific consultation processes with tangata whenua, and details of agreement as determined in consultation with tangata whenua.</p>
	40 – Te Rūnanga o Ngāti Mutunga	Support	>Amend Policy 16 to include changes to (a) and inclusion of new clauses (k) to (m).
	41 – Te Korowai o Ngāruahine Trust	Support	>Amend Policy 16 (a), (d), (h), and (i); include new clause (k), (l), and (m).
	48 – Taranaki District Health Board	Oppose	<p>>Amend Policy 16 (a) to replace ‘take into account’ to ‘encouraging’.</p> <p>>‘Encouraging’ is a weak word.</p> <p>>We request that the submission be declined.</p>
	58 – Te Atiawa	Support	<p>>Amend Policy 16 to read: to include ‘process, including decision-making’</p> <p>>This is consistent with the principles of tino rangatiratanga.</p> <p>>Amend Policy 16 to include new Clauses (k) and (l).</p>
Policy 17 – Public access	2 – Federated Farmers	Oppose	>Amend Policy 17 to include ‘Public access over private land remains at the discretion of the landowner.’



			<p>>Public access over private land should be formalised through legal mechanisms such as easements etc. This should not be subject to the discretion of the landowner as this is for public use.</p> <p>>We request that the submission be declined.</p>
	41 – Te Korowai o Ngāruahine Trust	Support	<p>>Amend Policy 17 so as to not enhance public access to the coastal environment where that activity comprises the sites of significance (Schedule 5A and B) and where that access would adversely affect indigenous biodiversity, wāhi tapu and wāhi taonga.</p>
	42 – Ngati Hine Hapū of Te Atiawa	Support	<p>>Amend Policy 17(b) to protect cultural sites from public access.</p>
Policy 18 – Amenity values	20 – Meridian Energy Ltd	Oppose	<p>>Amend Policy 18 to delete reference to historic heritage</p> <p>>Allowing this would remove consideration on effects of activities on the amenity values of NZ’s historic heritage sites.</p> <p>>This is inconsistent with the RMA.</p> <p>>We request that the submission be declined.</p>
	29 – Department of Conservation	Support	<p>>Amend Policy 18 to include new clause (e).</p>
Policy 20 – Avoidance of increasing coastal hazard or public safety risks	46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	Oppose	<p>>Amend Policy 20 to include the word ‘unacceptable’.</p> <p>>Refer to our previous comment relating to ‘unacceptable levels’.</p>
	42 – Ngati Hine Hapū of Te Atiawa	Support	<p>>Amend Policy 20 to show how or what will be done to provide a natural defence from coastal hazards.</p>
Policy 22 – Discharge of water or contaminants to coastal water	60 – Te Kaahui o Rauru	Support	<p>>Amend Policy 22(a) to include Māori values as a criteria for acceptable quality.</p>



Policy 27 – Discharges of stormwater	40 – Te Rūnanga o Ngāti Mutunga	Support	>Amend Policy 27 to include a new Clause (a)(vi).
	58 – Te Atiawa	Support	>same as submitter 40.
Policy 29 – Impacts from offshore petroleum drilling and production	40 – Te Rūnanga o Ngāti Mutunga	Support	>Amend Policy 29 by removing the word ‘accidental’.
	41 – Te Korowai o Ngāruahine Trust	Support	>Amend Policy 29 to remove the word “accidental”.
Policies 31 to 39 – Structures	41 – Te Korowai o Ngāruahine Trust	Support	>Amend Policies 31 to 39 [Structures] to recognise the Takutai Moana Act 2011 and the extent to which structures prejudice Māori customary and protected rights along the coastline.
	58 – Te Atiawa	Support	>Amend Policies 31 to 39 [Structures] to include reference to Schedule 5B (and recognition of the Takutai Moana Act 2011) to provide assurance that structures are not placed within the sites of significance.
Policy 32 – Placement of structures	41 – Te Korowai o Ngāruahine Trust	Support	>Amend Policy 32 to include reference to Schedule 5B and ensure that structures are not placed within the sites of significance.
Policy 34 – Appropriateness of hard protection structures	57 – Heritage New Zealand	Support	>Amend Policy 34 to read: (h) the management of adverse effects on historic heritage in accordance with Policy 15.
Policy 36 – Maintenance, repair, replacement	43 – Royal Forest and Bird Protection Society	Support	>Amend Policy 36 to read: Maintenance, repair, replacement and minor upgrading of existing lawful structures and reclamations will be allowed: A. where it does not increase the scale of significance of the effects of the activity or structure; and



and minor upgrading of existing structures			
Policy 38 – Removal of coastal structures	37 – Petroleum Exploration and Production Association of NZ	Support	>Clarify policy expectations for planning for decommissioning and removal by allowing for a description of general principles and options for decommissioning and removal of new structures.
Policy 42 – Disturbance of the foreshore and seabed	57 – Heritage New Zealand	Support	>Amend Policy 42 to include adverse effects on historic heritage (refer to Policy 15).
Policy 44 – Extraction or deposition of material	6 – Trans-Tasman Resources Ltd	Oppose	>Amend Policy 44 to delete clause (f). >Deleting this clause will not guarantee that deposited material is of a similar size, sorting and parent material as the receiving sediments. >We request that the submission be declined.
	9 – Karen Pratt	Support	>Amend Policy 44 to include additional considerations and read as follows: (c) generally, not occur in close proximity to moderate to high relief offshore reefs; (d) have regard to unique geological features that drive benthic primary production in the South Taranaki Bight.
	41 – Te Korowai o Ngāruahine Trust	Support	>Amend Policy 44 to exclude areas identified in Schedules 2, 4A and 4B, 5A and 5B and 6 plus areas subject to a crown application or settlement under the Takutai Moana Act 2011.
	57 – Heritage New Zealand	Support	>Amend Policy 44 by adding Policy 44 (h).
Policy 45 – Appropriateness of reclamation or drainage	26 – Transpower NZ Ltd	Oppose	>Amend Policy 45(d) by including the word ‘Enable’ and deleting ‘will not be allowed unless’. >The submission is too permissive. >We request that the submission be declined.



Policy 49 – Noise and vibration	9 – Karen Pratt	Support	>Amend Policy 49 to adopt the same precautionary principles applied by the Environmental Protection Authority by adopting similar wording to Condition 10 for the Trans-Tasman Resources consent for ironsand mining and which states that there be “...no adverse effects at a population level’ on blue whales, mammals in the threat classification, or on the IUC red list”.
	43 – Royal Forest and Bird Protection Society	Support	>Amend Policy 49 to read: (a) avoid adverse effects on marine mammals and fish species consistent with policies 8, 9 and 14; and (b) be managed to avoid, remedy or mitigate other minimise adverse environmental effects.
	60 - Te Kaahui o Rauru	Support	>Amend Policy 49 to focus on avoiding and remedying adverse environmental effects before mitigating and emphasize the protection of biodiversity from adverse environmental effects.
New Policy – National grid	26 – Transpower NZ Ltd	Oppose	>Amend Plan to include new policy specific to the National Grid >The proposed new policy does not consider culturally significant areas, taonga, etc. >We request that the new policy as it stands be declined. In our view, the new policy should include considerations on iwi participation, culturally significant areas, taonga, etc.
3.5 Plan Methods			
Method 1 – Advice and information	41 – Te Korowai o Ngāruahine Trust	Support	>Amend Implementation Method 1 to include the provision of advice and information about the cultural significance and importance of the coastal and marine environment to Māori and iwi/hapū.
	43 – Royal Forest and Bird Protection Society	Support	>Amend Implementation Method 1(g) to include reference to the Marine Mammal Protection Act 1978, Wildlife Act 1953 and Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012.
NEW Method – Spatial planning	55 – Kiwis Against Seabed Mining	Support	>Amend Plan to include a new Implementation Method for the Taranaki Regional Council to use spatial planning to achieve integrated management of the marine environment that is collaborative and inclusive.
	56 – Greenpeace	Support	>same as above



Method 15 – Integrated management	56 – Greenpeace	Support	>Amend Implementation Method 15 so that integrated marine management implemented through integrated management of fisheries resources, marine eco-systems and other natural resources and that there is an integrated management of any activities that occur across jurisdictional boundaries and/or are managed by multiple regimes.
Methods 21 to 31 - Historic heritage	28 – Grant Knuckey	Support	>Amend Implementation Methods 21 - 31 to require reports mandated by mana whenua and including cultural dimensions applying matauranga Māori.
			>Amend Implementation Methods 21 – 31 to include requirements that all applications for resource consent policy; or plan changes; or variations are to be reported on by cultural adviser(s) mandated by tangata whenua of Taranaki with costs to be borne by proponents.
			>Amend Implementation Methods 21 – 31 to require marine spatial planning - incorporating matauranga Māori in collaboration with mana whenua.
	39 – Maniapoto Māori Trust Board	Support	>Encourage Council to uphold the principles of the Treaty of Wāitangi and to actively look at Māori representation on its standing committees.
	57 – Heritage New Zealand	Support	>Amend Section 6.5 by adding new Implementation Methods within the section to read: Regularly review and update Schedule 7 [Historic Heritage] to reflect the latest information; for example, new entries on the New Zealand heritage list/Rārangi Kōrero and new sites of significance identified by iwi and/or hapū.
Method 25 – Iwi involvement or partnership	42 – Ngati Hine Hapū of Te Atiawa	Support	>Amend Implementation Method 25 by deleting and replacing the word “consider” (in relation to Iwi involvement or partnerships in Council resource investigations and projects) with a stronger word to show a stronger commitment from the Taranaki Regional Council.
Method 29 – Historic heritage	57 – Heritage New Zealand	Support	>Amend Implementation Method 29 to note the potential issues with silent files and consider using indicative markers on planning maps and consultation with iwi and/or hapū instead.



Method 51 – Noise standards	43 – Royal Forest and Bird Protection Society	Support	>Amend Implementation Method 51 to delete reference to New Zealand Standards and replace with: [...] considerations of the latest information of the effects of noise of marine species and habitats. The use of the most recent professionally supported noise modelling for the marine environment. Taking a precautionary approach where limited information is available.
Rule 2 – Stormwater discharges	46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	Oppose	>Retain Rule 2 as notified. >We request that the submission be declined and Rule 2 (Discretionary Activity) be amended to include standards/terms/conditions to include new clauses (a)(b)(c) as per our submission.
	47 – Fonterra	Oppose	>Same as above
Rule 12 – Seismic surveying and bathymetric testing	6 – Trans-Tasman Resources Ltd	Oppose	>Retain Rule 12 noting surveys and tests are important and useful for establishing or monitoring key aspects of the coastal environment and that the effects are minor and transitory. >It is important to note that these activities should not be allowed if the intention is to exploit NZ's mineral resources. >We request that the submission be declined and Rule 12 be amended to reflect the decision requests of submitters 21, 29 (inclusion of whale sanctuary), 40, and 41.
	37 – Petroleum Exploration and Production Association of NZ	Oppose	>Same as above.
	29 – Department of Conservation	Support	>Amend Rule 12 to include a rule for whale sanctuary in the Taranaki coastal environment.
	40 – Te Rūnanga o Ngāti Mutunga	Support	>Amend Rule 12 to make seismic surveying or bathymetric testing activity a Discretionary Activity (rather than a Permitted Activity)
	41 – Te Korowai o Ngāruahine Trust	Support	>Amend Rule 12 to require a higher level of regulatory control for seismic surveying or bathymetric testing activity (currently a Permitted Activity). >Amend Rule 12 to include a standard/term/condition that ensures no adverse effects on the cultural interests of sites specified in Schedule 5B.



	43 – Royal Forest and Bird Protection Society	Support	>Amend Rule 12 to make seismic surveying and bathymetric testing: a Discretionary Activity in the Open Coast and Port; a Non-complying Activity in the Outstanding Value, Estuaries Unmodified and Estuaries Modified coastal management areas (rather than a Permitted Activity).
	44 – Nga Motu Marine Reserve Society Inc	Support	>Amend Rule 12 to require a higher level of regulatory control and prohibit seismic surveying or bathymetric testing activity (currently a Permitted Activity).
	57 – Kiwis Against Seabed Mining	Support	>Oppose Rule 12 in which the Activity Classification for testing and bathymetric testing is a Permitted Activity.
	56 – Greenpeace	Support	>Oppose Rule 12 in which the Activity Classification for testing and bathymetric testing is a Permitted Activity.
	58 – Te Atiawa	Support	>Amend Rule 12 by changing the Activity Classification to Discretionary Activity (currently a Permitted Activity) to provide iwi the opportunity to be involved in the decision-making process and ensure conditions of consent are monitored AND Add a new standard/term/condition to ensure no adverse effects on cultural values associated with sites identified in Schedules 5A and 5B.
Rules 13 and 14 – Other discharges	6 – Trans-Tasman Resources Ltd	Oppose	>Retain Rules 13 and 14. >We request that the submission be declined and these rules be amended according to our submission including the submissions of submitters' 21 and 44.
	21 – Climate Justice Taranaki	Support	>Amend rules 13 and 14 to clarify and provide examples of the types of contaminants that would fall under these 'catch-all' rules, including whether they are designed to capture contaminant discharge from industrial facilities. >Amend Rule 13 to include public notification of relevant discharge activities.
	44 – Nga Motu Marine Reserve Society Inc	Support	>Amend Rules 13 and 14 to require a higher level of regulatory control and prohibit seismic surveying or bathymetric testing activity (currently a Discretionary Activity in the Open Coast and Port and a Non-complying Activity in the other coastal management areas).
Rule 18 – Outfall structure placement	21 – Climate Justice Taranaki	Support	>Oppose permitting the placement of outfall structures in the CMA and seek that such activities be Prohibited or Non-Complying in coastal management areas: Outstanding Value and Estuaries Unmodified, and Discretionary in the other areas.



			Primarily because without a resource consent it is impossible to know whether the standards/terms/conditions are met.
	29 – Department of Conservation	Support	>Amend Rule 18 to exclude its application to coastal management areas, Outstanding Value and Estuaries Unmodified.
	40 – Te Rūnanga o Ngāti Mutunga	Support	>Oppose permitting the placement of outfall structures in the CMA and seek that such activities be a Discretionary Activity.
	41 – Te Korowai o Ngāruahine Trust	Support	>Amend Rule 18 to make this rule a Discretionary Activity (rather than Permitted Activity).
	42 – Ngati Hine Hapū of Te Atiawa	Support	>Amend Rule 18 to make outfall structure placement a Discretionary Activity (rather than a Permitted Activity) AND that there be iwi/hapū consultation in all cases.
	58 – Te Atiawa	Support	>Amend Rule 18 by including in the standards/terms/conditions a clause that refers to Schedules 5A and 5B
Rule 21 – Navigation aid erection and placement	41 – Te Korowai o Ngāruahine Trust	Support	>Amend Rule 21 to make this rule a Discretionary Activity (rather than Permitted Activity).
	42 – Ngati Hine Hapū of Te Atiawa	Support	>Amend Rule 21 to make navigation aid erection or placement a Discretionary AND that there be iwi/hapū consultation in all cases.
	58 – Te Atiawa	Support	>Amend Rule 21 by including a standard/term/condition that refers to Schedules 5A and 5B
Rule 22 – Network utility structure erection or placement	40 – Te Rūnanga o Ngāti Mutunga	Support	>Amend Rule 22 to make the erection or placement of network utility structures in the CMA a Discretionary Activity (rather than a Controlled Activity).
	41 – Te Korowai o Ngāruahine Trust	Support	>Amend Condition (b) of Rule 22 to read: (b) erection or placement of the structure does not have an adverse effect on the values associated with historic heritage identified in Schedule 5A and B Historic heritage; [...]
	45 – Powerco	Oppose	>Retain Rule 22. >We request that the submission be declined and this rule be amended according to our submission including the submission of submitters, 40, 41 and 58.
	58 – Te Atiawa	Support	>Amend Rule 22 to change the Activity Classification to Discretionary Activity (rather than a Controlled Activity).



Rule 25 – Hard protection structure erection or placement	59 KiwiRail	Oppose	>Rule 25 should be retained. >We request that this submission be declined and this rule be changed according to our submission.
NEW Rule 26A – Disturbance of seabed by mining	6 – Trans-Tasman Resources Ltd	Oppose	>Amend Plan to include new rule 26A to explicitly address disturbance of the seabed by drilling. Classification: Permitted activity. >This is too permissive. >We request that the submission be declined.
Rule 33 – Other structure erection or placement	6 – Trans-Tasman Resources Ltd	Oppose	>Retain Rule 33. >We request that the submission be declined and that this rule be amended to reflect our submission.
	45 – Powerco	Oppose	>Retain Rule 33. >We request that the submission be declined and that this rule be amended to reflect our submission.
	46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	Oppose	>Retain Rule 33. >We request that the submission be declined and that this rule be amended to reflect our submission.
	47 – Fonterra	Oppose	>Retain Rule 33. >We request that the submission be declined and that this rule be amended to reflect our submission.
	59 – KiwiRail	Oppose	>Retain Rule 33. >We request that the submission be declined and that this rule be amended to reflect our submission.
Rules 34 – Other structure	6 – Trans-Tasman Resources Ltd	Oppose	>Retain Rule 34. >We request that the submission be declined and that this rule be amended to reflect our submission.



erection or placement	30 – First Gas Ltd	Oppose	>Amend Rule 34 to make network utility underground pipelines or pipelines attached to existing bridge or access structures in Outstanding Value coastal management area a Controlled Activity (rather than Non-complying). >We request that the submission be declined and that this rule be amended to reflect our submission.
	45 – Powerco	Oppose	>Retain Rule 34. >We request that the submission be declined and that this rule be amended to reflect our submission.
Rules 36 – Maintenance repair, alteration, extension, or removal and replacement of existing lawfully established structures	59 – KiwiRail	Oppose	>Amend Rule 36 to provide for repair of hard protection structures as a Permitted Activity (rather than a Discretionary Activity). >This is too permissive. >We recommend that the submission be declined.
Rule 37 – Existing lawfully established network structures	30 – First Gas Ltd	Oppose	>Amend Rule 37 to make network utility pipeline repair, alteration or extension a Permitted Activity (rather than a Non-complying Activity). >This is too permissive. >We recommend that the submission be declined.
	41 – Te Korowai o Ngāruahine Trust	Support	>Amend Condition (c) of Rule 37 to read: [...] (c) the activity does not have an adverse effect on the values associated with historic heritage identified in Schedule 5A and B [Historic heritage]; [...]
	58 – Te Atiawa	Support	>Amend Rule 37 to recognise Iwi notified as an affected party. AND Change reference in the standards/terms/conditions to Schedule 5 to Schedules 5A and 5B.
Rule 42 – Other structure repair,	6 – Trans-Tasman Resources Ltd Support	Oppose	>Retain Rule 42.



extension, removal or replacement			>We request that the submission be declined and that this rule be amended to reflect our submission.
	45 – Powerco	Oppose	>Retain Rule 42. >We request that the submission be declined and that this rule be amended to reflect our submission.
	46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	Oppose	>Retain Rule 42. >We request that the submission be declined and that this rule be amended to reflect our submission.
	47 – Fonterra	Oppose	>Retain Rule 42. >We request that the submission be declined and that this rule be amended to reflect our submission.
Rule 43– Other structure repair, extension, removal or replacement	6 – Trans-Tasman Resources Ltd	Oppose	>Retain Rule 43. >We request that the submission be declined and that this rule be amended to reflect our submission.
	45 – Powerco	Oppose	>Retain Rule 43. >We request that the submission be declined and that this rule be amended to reflect our submission.
Rule 44 – Structure removal or demolition	6 – Trans-Tasman Resources Ltd	Oppose	>Retain Rule 44. >We request that the submission be declined and that this rule be amended to reflect our submission.
	41 – Te Korowai o Ngāruahine Trust	Support	>Amend Rule 44 to require notification to iwi of any structure removal or demolition work in the CMA.
	46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	Oppose	>Retain Rule 44. >We request that the submission be declined and that this rule be amended to reflect our submission.
Rule 45 – Structure	46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	Oppose	>Retain Rule 45. >We request that the submission be declined and that this rule be amended to reflect our submission.



removal or demolition	58 – Te Atiawa	Support	>Amend Rule 45 by changing the Activity Classification to Discretionary Activity (rather than a Controlled Activity).
Rule 47 – Temporary occupation for community, recreational or sporting events	41 – Te Korowai o Ngāruahine Trust	Support	>Amend Rule 47 to require notification to iwi of any community, recreational or sporting events authorised by this rule AND Amend Condition (b) of Rule 47 to read: (b) the activity does not have an adverse effect on the values associated with historic heritage identified in Schedule 5A and B [Historic heritage]; [...]
Rule 48 – Continued occupation	6 – Trans-Tasman Resources Ltd	Oppose	>Retain Rule 48. >We request that the submission be declined and that this rule be amended to reflect our submission.
	45 – Powerco	Oppose	>Retain Rule 48. >We request that the submission be declined and that this rule be amended to reflect our submission.
	46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	Oppose	>Retain Rule 48. >We request that the submission be declined and that this rule be amended to reflect our submission.
	47 – Fonterra	Oppose	>Retain Rule 48. >We request that the submission be declined and that this rule be amended to reflect our submission.
Rule 49 – Continued occupation	45 – Powerco	Oppose	>Retain Rule 49. >We request that the submission be declined and that this rule be amended to reflect our submission.
	46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	Oppose	>Retain Rule 49. >We request that the submission be declined and that this rule be amended to reflect our submission.
	47 – Fonterra	Oppose	>Retain Rule 49. >We request that the submission be declined and that this rule be amended to reflect our submission.



Rule 50 – Continued occupation	46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	Oppose	>Retain Rule 50. >We request that the submission be declined and that this rule be amended to reflect our submission.
	47 – Fonterra	Oppose	>Retain Rule 50. >We request that the submission be declined and that this rule be amended to reflect our submission.
Rule 52 – Collection of benthic grab samples	6 – Trans-Tasman Resources Ltd	Oppose	>Seek consequential changes to standard (g) that gives effect to previous reliefs sought by replacing ‘or regionally distinctive’ with ‘(declining)’ and deleting ‘or any sensitive marine benthic habitat’. >The deletion of regionally distinctive species and any sensitive marine benthic habitat will not consider effects of seabed mining on important species within Taranaki, and Significant indigenous biodiversity. >Collection of benthic grab samples should not be permitted for the purposes of commercial exploitation of Taranaki’s mineral resources. >We request that this submission be declined.
	58 – Te Atiawa	Support	>Amend Rule 52 so that Iwi are notified.
Rule 53 – Minor disturbance and removal	6 – Trans-Tasman Resources Ltd	Oppose	>Retain Rule 53. >We request that the submission be declined and that this rule be amended to reflect our submission.
	43 – Royal Forest and Bird Protection Society	Support	>Amend Rule 53 by including matters for control to consider effects on indigenous biodiversity, natural character and natural features and landscapes and other matters to consider the effects of noise, light and location.
Rule 65 – Taking or use of water, heat or energy	6 – Trans-Tasman Resources Ltd	Oppose	>Retain Rule 65. >We request that the submission be declined and that this rule be amended to reflect our submission.
	58 – Te Atiawa	Support	>Add a new standard/term/condition to Rule 65 containing a water take limit.
3.8 Plan Definitions			



Definition – Adaptive management	6 – Trans-Tasman Resources Ltd	Oppose	<p>>Amend to include “which includes allowing an activity to commence on a small scale or for a short period so that its effect” and deleting the words “with an aim to reducing uncertainty over time via system monitoring”.</p> <p>>We recommend that the TRC refer to the Ministry for the Environment. 2016. New Zealand’s experiences with adaptive management for seabed mining projects: A submission to the International Seabed Authority to support the development of a regulatory framework for the exploitation of seabed minerals for guidance.</p> <p>>We request that the submission be declined.</p>
3.9 Plan Schedules and Appendices			
Schedule 2 – Coastal areas of outstanding value	6 – Trans-Tasman Resources Ltd	Oppose	<p>>Amend Schedule 2 to delete inclusion of the Project Reef (ONC6) as an area of outstanding value, including: the reference to ONC6 and Map-link Map 42 on page 121; the entire ONC6 Project Reef material on page 129; and Map Link Map 42.</p> <p>>We request that this submission be declined. Allowing this will render our coastal areas of outstanding values vulnerable to extractive industries, particularly to seabed mining.</p>
	9 – Karen Pratt	Support	>Inclusion of the Project Reef (ONC6) as an area of outstanding value.
	10 – South Taranaki Underwater Club	Support	>Inclusion of the Project Reef (ONC6) as an area of outstanding value.
	11 – Bruce Boyd	Support	>Inclusion of the Project Reef (ONC6) as an area of outstanding value.
Schedule 4A – Significant species and ecosystems	6 – Trans-Tasman Resources Ltd	Oppose	<p>>Delete Schedule 4A in its entirety or amend to remove any non-threatened species and any at risk species other than those which are listed as at risk (declining) under the New Zealand Threat Classification System.</p> <p>>We request that this submission be declined. Allowing this will render our significant species and ecosystems (including other species) vulnerable to extractive industries, particularly seabed mining.</p>
	29 – Department of Conservation	Support	>Amend Schedule 4A to include maps of areas, ecosystems, and habitats that have significant indigenous biodiversity values.
	43 – Royal Forest and Bird Protection Society	Support	>Amend Schedule 4A by identifying and mapping the locations where rare and uncommon ecosystem types identified in the schedule occur.



			>Amend Schedule 4A by adding to the schedule: non-vascular plant species, including coastal lichens; data deficient marine species; and missing regionally distinctive species including the common dolphin.
Schedule 4B – Sensitive marine benthic habitats	6 – Trans-Tasman Resources Ltd	Oppose	>Delete Schedule 4B in its entirety. >We request that this submission be declined. Allowing this will render our sensitive benthic habitats vulnerable to extractive industries, particularly seabed mining.