

Officers report on Decisions Requested

Proposed Coastal Plan for Taranaki

9 October 2018

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1 Introduction

1.1 Purpose

The purpose of this report is to present an officers report that summaries the decisions sought in submissions on the *Proposed Coastal Plan for Taranaki* and to make preliminary recommendations in relation to the Taranaki Regional Council's (the Council) responses to those submissions.

Note, the recommendations presented in this report are officer recommendations and have not yet been formally considered by the Council.

1.2 Scope and background

The *Proposed Coastal Plan for Taranaki* was publicly notified for submissions on 24 February 2018, with submissions closing on 27 April 2018.

Public notice calling for further submissions supporting or opposing the initial submissions was made on 21 July 2018 and closed on 4 August 2018. Further submissions may only be made in support of or opposition to the submissions already made. A further submission cannot extend the scope of the original submission and can only seek allowance or disallowance (in whole or in part) of the original submission.

Sixty-one initial submissions were received with 24 further submissions were also received.

Section 1 of this report introduces the report, which has been prepared by the Council to inform the review of the Coastal Plan in accordance with Clause 7 of the First Schedule of the *Resource Management Act 1991* (the RMA).

Section 2 of this report provides an index of initial and further submitters.

Section 3 of this report summarises decisions sought by initial submitters and officers' preliminary recommendations (recognising final recommendations are subject to the outcomes of pre-hearing consultation, which has yet to be commenced).

As far as practicable, decisions sought by various submitters have been grouped by specific sections of the Proposed Plan. Some submitters have not stated clearly the

decision they wish the Council to make or the reason behind the submission. In such cases the intent of the submission has been considered or inferred from the submission and a response made accordingly. Submitters will have a further opportunity to clarify their submissions in responding to this report and in pre-hearing meetings or at a Council hearing.

For each decision sought by initial submitters, this document sets out:

- the decision(s) requested by submitters
- support or opposition from further submitters to the decision requested by the initial submitter, and
- the officers' recommendation in response to the decision requested, including reasons.

1.3 How to read this document

Individual submission points are numbered for ease of reference as shown below. Any support or opposition from further submitters to the decision requested by the initial submitter is also identified.

Submitter	Submission point	Submitter's requests	Officers recommendation and response
Rule XYZ			
Submitter id (Each initial submitter has an identification number, e.g. 1 to 61)	Submission point – numbering for decisions sought in submissions	Support / Amend / Other	Accept / Accept in part / Accept in kind / Decline / No relief necessary
		Submitter's request.	Explanation of recommendation
Further submitter (if applicable)		Support / Opposition / Neutral - to the submission point	

Unless the context indicates otherwise, all references to Plan provisions relate to the publicly notified version of the *Proposed Coastal Plan for Taranaki*.



2 Submitters

This section identifies initial submitters and further submitters to the Proposed Plan.

Initial submitters

Submitter number and name		Submitter number and name		Submitter number and name	
1.	Tom P Waite	22.	Lyndon De Vantier	43.	Royal Forest and Bird Protection Society
2.	Federated Farmers	23.	New Plymouth District Council	44.	Nga Motu Marine Reserve Society Inc
3.	Roger Maxwell	24.	Paora Aneti 17 & 18 Māori Reservation Trustees	45.	Powerco
4.	Allen Pidwell	25.	New Zealand Petroleum and Minerals	46.	Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd
5.	Point Board Riders Inc	26.	Transpower NZ Ltd	47.	Fonterra
6.	Trans-Tasman Resources Ltd	27.	Taranaki Chamber of Commerce	48.	Taranaki District Health Board
7.	Waikato Regional Council	28.	Grant Knuckey	49.	Cam Twigley
8.	Silver Fern Farms Management Ltd	29.	Department of Conservation	50.	Te Kāhui o Taranaki Trust
9.	Karen Pratt	30.	First Gas Ltd	51.	Taranaki Energy Watch Inc
10.	South Taranaki Underwater Club	31.	Komene 13B Māori Reservation Trustees	52.	Emily Bailey
11.	Bruce Boyd	32.	Port Taranaki Ltd	53.	Taranaki Regional Council
12.	Chorus New Zealand Ltd	33.	New Zealand Defence Force	54.	Maritime New Zealand
13.	Spark New Zealand Trading Ltd	34.	Fay Mulligan and Carol Koha	55.	Kiwis Against Seabed Mining
14.	Vodafone New Zealand Ltd	35.	Radio New Zealand Ltd	56.	Greenpeace
15.	Surfbreak Protection Society	36.	Todd Energy	57.	Heritage New Zealand
16.	Ministry for Primary Industries	37.	Petroleum Exploration and Production Association of NZ	58.	Te Atiawa
17.	David Pearce	38.	Nigel Cliffe	59.	KiwiRail
18.	Surfing Taranaki	39.	Maniapoto Māori Trust Board	60.	Te Kaahui o Rauru
19.	South Taranaki District Council	40.	Te Rūnanga o Ngāti Mutunga	61.	Te Rūnanga o Ngāti Ruanui Trust

Submitter number and name		Submitter number and name		Submitter number and name	
20.	Meridian Energy Ltd	41.	Te Korowai o Ngāruahine Trust		
21.	Climate Justice Taranaki Inc	42.	Ngati Hine Hapū of Te Atiawa		

Further submitters

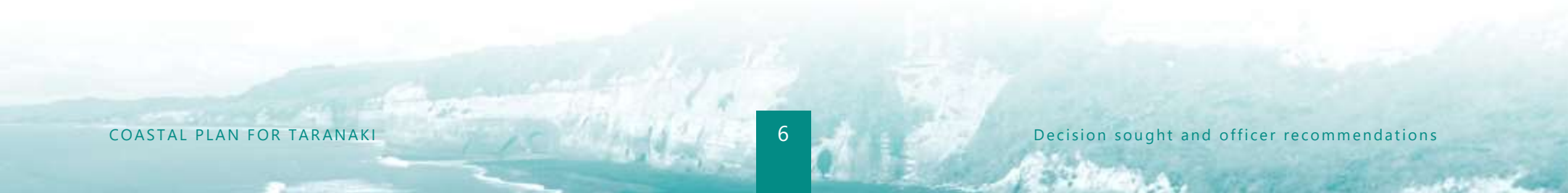
Submitter number and name		Submitter number and name		Submitter number and name	
2.	Federated Farmers	26.	Transpower NZ Ltd	42.	Ngati Hine Hapū of Te Atiawa
6.	Trans-Tasman Resources Ltd	29.	Department of Conservation	43.	Royal Forest and Bird Protection Society
9.	Karen Pratt	32.	Port Taranaki Ltd	44.	Nga Motu Marine Reserve Society Inc
10.	South Taranaki Underwater Club	33.	New Zealand Defence Force	46.	Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd
11.	Bruce Boyd	35.	Radio New Zealand Ltd	47.	Fonterra
16.	Ministry for Primary Industries	37.	Petroleum Exploration and Production Association of NZ	51.	Taranaki Energy Watch Inc
20.	Meridian Energy Ltd	40.	Te Rūnanga o Ngāti Mutunga	55.	Kiwis Against Seabed Mining
21.	Climate Justice Taranaki Inc	41.	Te Korowai o Ngāruahine Trust	61.	Te Rūnanga o Ngāti Ruanui Trust

3 Summary of decisions sought and officers responses

This section sets out the summary of decisions sought by submitters for the Plan and officers preliminary response to the decision sought.

As far as practicable, decisions sought by various submitters have been grouped according to common themes (where they relate to changes to Plan provisions or process generally) or to specific sections of the Proposed Plan (where they have been referenced or inferred). Where specific wording changes to Plan provisions are requested by submitters or proposed by officers, recommended insertions are marked in red and underlined, while recommended deletions are shown as ~~struck-out~~ text.

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3.1 Whole Plan – General comments

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
General – Plan			
2 – Federated Farmers	1	Amend	No relief necessary
		Submitter is broadly supportive of the planning approach taken but seeks that normal farming activities that occur in the coastal marine area, where adjacent to farms or where the farm boundary extends to the coastal marine area, are permitted.	Note rules relating to use and development activities do not apply to activities landward of the coastal marine area line.
4 – Allen Pidwell	2	Support	Accept
		Submitter supports the Proposed Plan.	Support noted.
26 – Transpower NZ Ltd	3	Amend	Accept
		Submitter is broadly supportive of the Proposed Plan subject to specific amendments to give full effect to the <i>National Policy Statement for Electricity Transmission 2008</i> .	Support is noted. Officers note that the submitter has requested specific amendments throughout the Plan, which is believed, to bring the Plan in line with provisions within the <i>National Policy Statement for Electrical Transmission</i> . Officers agree that the <i>National Policy Statement for Electrical Transmission</i> is required to be given effect to within the Plan and notes consequential amendments have been made to the Plan in response to specific reliefs sought by the submitter.
29 – Department of Conservation	4	Support	No relief necessary
		Submitter notes the Proposed Plan is well structured and easy to use.	Comments noted.
33 – New Zealand Defence Force	5	Amend	Accept
		Submitter seeks amendment to the Plan to consistently refer to “ <i>temporary military training activities</i> ” and omit the use of “ <i>military training activities</i> ”.	Officers agree with the relief sought by the submitter. Officers have reviewed the Plan to consistently refer to “ <i>temporary military training activities</i> ” and omit the use of “ <i>military training activities</i> ” or other variant where “ <i>temporary military training activities</i> ” would suffice. Officers recommend consequential amendments to the definition section of the Plan to define “ <i>temporary military training activities</i> ” and delete the definition of “ <i>military training activities</i> ”.

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
			As a consequential amendment, reference to "Military training" in the definitions section should be deleted to be replaced by a new proposed definition for "temporary military training" that would read as follows: <u>Temporary military training means a temporary training activity undertaken for defence purposes in accordance with the Defence Act 1990.</u>
34 – Fay Mulligan and Carol Koha	6	Other	No relief necessary
		Note submitters wish to speak in reference to protections of cultural values/activities and Māori involvement and protection of tikanga.	No precise details of amendments sought to the Plan have been provided. However, the submitters' wish to be heard relating to Māori involvement and protection of tikanga is noted.
36 – Todd Energy	7	Support	Accept
		Submitter supports the Proposed Plan as currently drafted.	Support noted.
41 – Te Korowai o Ngāruahine Trust	8	Support	No relief necessary
		Submitter broadly supports the overall direction of the Plan but highlights the benefits of marine spatial planning and seeks the adoption and application of an ecosystems based approach to prevent further degradation of the biodiversity and character of the coastal environment.	Officers note submitter's support for the Plan direction. In relation to marine spatial planning, officers note that considerable work has been done to collate information on uses and values in the coastal marine area, including the marine environment, and as appropriate, relevant spatial information and overlays have been included in the planning maps. These planning maps are underpinned by GIS information, which, though sitting outside the Plan, may provide additional information that can also be used to inform consenting processes. Together there is considerable information that contributes to marine spatial planning that may be built on over time.
55 – Kiwis Against Seabed Mining	9	Amend	Decline
		Submitter seeks amendments to the Plan to include marine spatial management and associated rules framework as an appropriate method to address fishing, oil and gas, and seabed mining.	No precise details of amendments sought to the Plan have been provided. However, Officers note that considerable work has been done to collate information on uses and values in the coastal marine area, including the marine environment, and as appropriate, relevant spatial information and overlays have been included in the planning maps. Furthermore, it is officers' contention that oil and gas and seabed mining have been appropriately addressed in the rules framework of the Plan pursuant to the Council's RMA responsibilities.
Further submissions – Ministry for Primary Industries (16)		Oppose	

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
			Officers note that fishing activities are controlled by the Ministry for Primary Industries and Fisheries New Zealand through the <i>Fisheries Act 1996</i> and it is not necessary or appropriate to provide for fishing activities within the Plan.
56 – Greenpeace	10	<p>Amend</p> <p>Submitter seeks amendments to the Plan to include marine spatial management and associated rules framework as an appropriate method to address fishing, oil and gas, and seabed mining.</p>	<p>Decline</p> <p>No precise details of amendments sought to the Plan have been provided. However, officers note that considerable work has been done to collate information on uses and values in the coastal marine area, including the marine environment, and as appropriate, relevant spatial information and overlays have been included in the planning maps. Furthermore, it is officers' contention that oil and gas and seabed mining have been appropriately addressed in the rules framework of the Plan pursuant to the Council's RMA responsibilities.</p>
Further submissions – Trans-Tasman Resources Ltd (6), Ministry for Primary Industries (16)		Oppose	Officers note that fishing activities are controlled by the Ministry for Primary Industries and Fisheries New Zealand through the <i>Fisheries Act 1996</i> and it is not necessary or appropriate to manage fishing activities within the Plan.
Indigenous biodiversity provisions			
3 – Roger Maxwell	11	<p>Other</p> <p>Submitter questions what action, if any, is proposed to manage/control the expansion of mangroves in the estuarine areas of the Taranaki coastal area?</p>	<p>No relief necessary</p> <p>Officers note that the Council has no immediate plans to control mangroves in the Taranaki region. Mangroves are known to be present at Urenui estuary. These were planted about 40 years ago to prevent coastal erosion (they were also planted in other estuaries but did not establish). At present the spread appears to be very slow and is not of concern at the moment. However, should monitoring indicate mangroves are becoming invasive to the detriment of local coastal values the Council would consider a site-led response that involves working with the local community to manage the problem.</p>
39 – Maniapoto Māori Trust Board	12	<p>Other</p> <p>Submitter seeks that the Taranaki Regional Council ensure that indigenous biodiversity in the coastal environment is maintained and enhanced and that it is protected.</p>	<p>No relief necessary</p> <p>Officers notes that the Council is committed to the maintenance and enhancement of indigenous biodiversity in not just the coastal environment but across the region. This commitment is demonstrated across a variety of Council policy documents and its resourcing for programmes and activities that implement those policies. In addition to its regulatory responsibilities under the RMA to maintain indigenous biodiversity in the coastal marine area and fresh water, the Council has adopted the <i>Pest Management Plan for Taranaki</i> (2018), the <i>Taranaki Regional Council Biosecurity Strategy</i> (2018), and the <i>Biodiversity Strategy for the Taranaki</i></p>
Further submissions – Te Korowai o Ngāruahine Trust (41), Te Atiawa (58)		Support	

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
			<i>Regional Council (2017)</i> that include a suite of regulatory and non-regulatory programmes for promoting biodiversity outcomes across the Taranaki region.
Life supporting capacity and mauri provisions			
39 – Maniapoto Māori Trust Board	13	Support	Accept
		Submitter supports recognition by Taranaki Regional Council of mauri and adverse effects when there is development of the coastal environment.	Support noted.
Petroleum related Plan provisions			
37 – Petroleum Exploration and Production Association of NZ	14	Support	Accept in part
		Submitter seeks all other petroleum-related Plan provisions not explicitly covered in their submission are retained.	Support noted. Petroleum related provisions have been retained. However, officers note consequential amendments to some provisions in response to reliefs sought by other submitters.
51 - Taranaki Energy Watch	15	Amend	No relief necessary
		Submitter seeks amendment to the Plan in relation to petroleum related provisions to reflect the precautionary approach (similar to that of Policy 3) such that objectives, policies and rules within the coastal marine area incorporate a precautionary regime for effects of activities that are uncertain, unknown or little understood.	The submitter is concerned that areas of the Plan relating to petroleum provisions do not reflect a precautionary approach, which, in their view, is required by the <i>New Zealand Coastal Policy Statement</i> . Officers suggest that no relief is necessary given that a precautionary approach is already adequately provided for via Policy 3 [Precautionary approach] of the Plan. Policy 3 is a General Policy that applies to all activities, including oil and gas industries, within the coastal environment and regardless of which coastal management area the activity may fall within. Officers further note that the potential risks associated with oil and gas exploration and production activities are well understood. In the main oil and gas exploration and production activities in the coastal marine area are largely a Discretionary Activity or a Non-complying Activity. Therefore, through the consenting process, Policy 3 and other relevant policies will be considered and applied as appropriate on a case-by-case basis.
Further submissions – Te Korowai o Ngāruahine Trust (41)		Support	
Further submissions – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd (46)		Oppose	
51 - Taranaki Energy Watch	16	Amend	Accept in part
		Submitter seeks amendment to the Plan in relation to petroleum related provisions to add objectives and policies to support the use of separation and buffer zones as appropriate planning tools/methods to manage oil and gas activities in the coastal marine area.	Officers note that separation and buffer zones have been considered and applied where it is practicable to do so. Officers do not believe it appropriate to include such detail in the Plan objectives. However, there are opportunities within the policy framework to do so. An

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Further submissions – Te Korowai o Ngāruahine Trust (41), Te Atiawa (58)		Support	<p>appropriate buffer to avoid, remedy or mitigate adverse effects associated with oil and gas activities (plus other activities) would depend upon the scale, type and location of the activity. Such matters would be considered through the consenting process. Accordingly, Officers recommend amendment to Policy 29 [Impacts from offshore drilling and production] to refer to the use of separation and buffer zones. No changes are recommended to Plan objectives.</p> <p>The revised Policy would read as follows:</p> <p><i><u>(aa) in relation to offshore production activities, adopting adequate separation and buffer distances between the activity having regard to the values and sensitivity of the environment;</u></i></p>
61 – Te Rūnanga o Ngāti Ruanui Trust	17	Amend	Decline
		Submitter seeks amendment to the Plan to reflect the Government's decision to cease offering new offshore oil and gas exploration permits and restricted permitting.	No precise details of amendments sought to the Plan have been provided. Officers acknowledge that the current Government has recently changed its stance on offshore oil and gas permits. However, officers note that the licensing of oil and gas exploration permits is regulated under separate legislation by other authorities. In terms of managing adverse environmental effects under the RMA, officers contend that it is not necessary to differentiate between new and existing hydrocarbon activities. In addition, officers note that the Plan will be operative for a 10 year period and there is a risk that such an amendment could easily be made redundant should a new Government change its stance on oil and gas exploration permits.
Further submissions – Te Rūnanga o Ngāti Mutunga (40), Te Korowai o Ngāruahine Trust (41), Royal Forest and Bird Protection Society (43), Te Atiawa (58)		Support	
Natural and historic heritage provisions			
39 – Maniapoto Māori Trust Board	18	Other	No relief necessary
		Submitter support the importance of natural and historic heritage and would like to ensure that the Māori narrative is incorporated into the rich history of Taranaki.	Comments noted. No specific relief is requested, however, officers note that a Māori narrative has been included where it is appropriate to do so and additional amendments to the Plan are also proposed to further support this.
Further submissions – Te Korowai o Ngāruahine Trust (41), Te Atiawa (58)		Support	
28 – Grant Knuckey	19	Amend	Accept in part
		Submitter seeks amendments to the Plan (and other actions) to ensure it adequately provides for cultural well-being, relationship of with ancestral and contemporary lands, waters, taonga and rohe, and to actively protect taonga and	No precise details of amendments sought to the Plan have been provided. However, officers suggest that the Plan in conjunction with recommended changes, amongst other things, will (as far as it is able) provide for the cultural

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		tapu spaces within the coastal environment or provide for management of the rohe in partnership with mana whenua (co-governance/management provisions).	well-being, relationship of Māori with ancestral and contemporary lands, waters, taonga and rohe, and will contribute to the protection of taonga and tapu spaces within the coastal environment. This will not necessarily be reflected in co-governance arrangements, which are matters outside the scope of the Plan and are more properly dealt with through the Council's annual planning process.
Further submissions – Te Korowai o Ngāruahine Trust (41), Te Atiawa (58)		Support	Of note, all the Plan objectives, policies and rules address effects of interest to iwi o Taranaki. However, specific objectives, policies, methods, standards/terms/conditions and schedules also apply to ensure coastal use and development appropriately recognise and provide for the management of adverse effects on tangata whenua values. The identification of iwi sites of significance in Schedule 5B of the Plan and associated planning maps (and proposed changes to include and schedule taonga species) should further assist Council in ensuring use and development in the coastal marine area avoid, remedy or mitigate adverse effects on Māori cultural and historic heritage values.
28 – Grant Knuckey	20	Amend	No relief necessary
		Submitter seeks amendment to the Plan to ensure it applies Māori attributes of mana, mauri, tapu, taonga to assessment of natural character, particularly in relation to reefs and coastal waters of Taranaki rohe moana and whenua.	Officers believe this is already provided for whereby assessments of natural features and landscapes include consideration of cultural, spiritual, historic and heritage associations, which in turn are underpinned by Plan objectives, policies and rules to protect such values.
39 – Maniapoto Māori Trust Board	21	Support	No relief necessary
		Submitter notes that tangata whenua values and relationships are key priorities to the submitter and desires the Council to work closely with Mokau ki Runga RMC around matters of social, cultural and economic wellbeing.	Comments noted.
40 – Te Rūnanga o Ngāti Mutunga	22	Other	No relief necessary

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		Taking into account the outcomes of previous engagement, submitter questions what criteria Council planners will use to identify affected parties for the rules outlined in the Plan.	<p>The submitter is not seeking amendment to the Plan but has raised a question with respect to its implementation.</p> <p>Officers note the Council's consenting procedures are set out in its standard operating procedures entitled <i>Resource Consents Procedure Document</i>. This document sets out guidance and direction for Council staff on a broad range of consenting matters, including those relating to notification and determining affected party status.</p> <p>More specifically, in relation to sites of significance, the Council has worked closely with iwi authorities and, as part of the Plan review process, have provided written agreement that iwi will be notified of, as an affected party, any activities occurring within, adjacent to, or impacting directly on tangata whenua sites of significance in the coastal marine area.</p> <p>The trigger for iwi involvement as an affected party is for any activities occurring within, adjacent to, or impacting directly on sites of significance in the coastal marine area. For such coastal permit applications the Council would advise the applicant that they would need affected party approval and suggest consultation be undertaken. If approval was not obtained from iwi the application would be notified.</p> <p>The Mana Whakahono a Rohe provisions of the RMA represents an opportunity to formalise this (and other) matters plus set out the operational details associated with planning and consenting processes including affected party definitions, appropriate consenting systems and processes, and applicant consultation requirements.</p>
Further submissions – Te Korowai o Ngāruahine Trust (41), Te Atiawa (58)		Support	
50 – Te Kāhui o Taranaki Trust	23	<p>Other</p> <p>Submitter questions the adequacy of Plan engagement and consultation.</p>	<p>No relief necessary</p> <p>The submitter is not seeking amendment to the Plan but questions the adequacy of Plan engagement and consultation.</p> <p>Appendix II of the Section 32 Evaluation Report summarises Council's engagement and consultation with iwi authorities (and other tangata whenua) on the Proposed Plan, including Council's response to advice received from iwi.</p> <p>Iwi engagement and consultation commenced in late 2012 and has been ongoing to this point in time. In relation to the Taranaki Iwi, engagement included very early preliminary engagement through participation with an Iwi thinkers group, the circulation and seeking of feedback on coastal archaeological report, seeking of feedback on a position paper on outstanding coastal areas, the circulation and seeking of feedback on draft Coastal Plan objectives and policies, consultation and</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
			seeking of feedback on a Draft Proposed Plan, the identification and mapping of sites and significance, and more recently the release of a Proposed Coastal Plan. It has also included, over that time, many hui and face-to-face meetings relating to not just the Coastal Plan but broader policy matters.
50 – Te Kāhui o Taranaki Trust	24	<p>Other</p> <p>Submitter seeks 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.</p>	<p>Agree in part</p> <p>The submitter is not seeking amendment to the Plan but seeks that all Iwi (hapū, marae/pā) be notified as an affected party to any activities occurring within, adjacent to, or impacting directly on statutory acknowledgement areas and historic heritage sites and sites of significance to Māori within the coastal marine area.</p> <p>The matters raised by the submitter have a wider application than just the Coastal Plan. Notwithstanding that, officers note that Council has already given partial relief to this request.</p> <p>In relation to sites of significance, the Council has worked closely with iwi authorities and, as part of the Plan review process, have provided written agreement that iwi will be notified of, as an affected party, any activities occurring within, adjacent to, or impacting directly on tangata whenua sites of significance in the coastal marine area.</p> <p>The 'trigger' for iwi involvement as an affected party is for any activities occurring within, adjacent to, or impacting directly on sites of significance in the coastal marine area. For such coastal permit applications the Council would advise the applicant that they would need affected party approval and suggest consultation be undertaken. If approval was not obtained from iwi the application would be notified.</p> <p>In relation to extending consenting notification requirements to hapū and marae, Mana Whakahono a Rohe provisions of the RMA represents an opportunity to discuss and formalise such arrangements.</p>
Further submissions – Te Korowai o Ngāruahine Trust (41), Te Atiawa (58)		Support	
61 – Te Rūnanga o Ngāti Ruanui Trust	25	<p>Amend</p> <p>Submitter seeks amendment to the Plan by:</p> <ul style="list-style-type: none"> linking cultural areas of significance to both the past (historic) and present cultural areas and traditions integrating objectives and policies with mana/tangata whenua with the rules section of the Plan. 	<p>Accept in part</p> <p>No precise details of amendments sought to the Plan have been provided. However, officers suggest that the Plan, in conjunction with recommended changes, does link Plan provisions with cultural areas of significance, and that Plan objectives and policies have been integrated with the rules section of the Plan.</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Further submissions – Te Korowai o Ngāruahine Trust (41), Te Atiawa (58)		Support	<p>Together, all Plan objectives, policies and rules are part of a framework for addressing and managing adverse effects on tangata whenua values. However, specific objectives, policies, methods, standards/terms/conditions, and schedules also apply.</p> <p>Officers note that, in response to the submitter request (and that of others), a number of amendments have been made to specific Plan provisions, including amendments to Policy 15 [Historic heritage] and Policy 16 [Relationship of tangata whenua], other relevant policies, and the inclusion of a schedule of taonga species, to strengthen provisions protecting tangata whenua values in the coastal environment under the RMA.</p>
Scope of the Plan – ‘Coastal Marine Area’ and ‘Coastal Environment’			
26 – Transpower NZ Ltd	26	<p>Other</p> <p>Confirmation is sought that the rules in the Plan only apply to the coastal marine area</p> <p>AND</p> <p>Submitter seeks clarification as to what Plan provisions apply to the coastal environment.</p>	<p>No relief necessary</p> <p>The submitter is not seeking amendments to the Plan but seek confirmation as to how the Plan provisions are applied.</p> <p>Officers confirm that the rules only apply to the coastal marine area. However, as stated in sections 1.4.1, 4, 5.1 and 6 of the Plan, its objectives, general policies and methods (excluding rules) address the wider coastal environment for the purposes of effective integrated management.</p>
Further submissions – Trans-Tasman Resources Ltd (6)		Support	<p>For the purposes of certainty and clarity, a minor amendment is proposed to Section 1.4 of the Plan to further highlight that the rules relate to the coastal marine area only. The amendment reads as follows:</p> <p><i>1.4 Application</i></p> <p><i>The provisions of the Plan have legal force under the RMA. Regional rules have the force and effect of a regulation under the RMA. For the purposes of this Plan, the rules only apply to activities in the coastal marine area.</i></p>
Coastal hazards			
39 – Maniapoto Māori Trust Board	27	<p>Other</p> <p>Submitter seeks that Council ensure adequate resourcing to reduce vulnerability to property and people from coastal hazards.</p>	<p>No relief necessary</p> <p>No precise details of amendments sought to the Plan have been provided. However, officers note that Council routinely considers and consults on the adequacy of resourcing and levels of services addressing natural hazard management as part of its annual planning and reporting under the <i>Local Government Act 2002</i>.</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Surf breaks			
1 - Tom P Waite	28	Support	No relief necessary
		Submitter supports the protection of surf breaks but submits that commercial development should not occur near river mouths or unique reef breaks.	Support noted. With regards to opposition to commercial development, the purpose of the Plan is to assist Council in giving effect to Section 5 of the RMA, which means managing the use, development and protection of natural and physical resources irrespective as to whether that use and development is 'commercial' or not. Of note, threats to coastal values are not confined to commercial activities.
18 – Surfing Taranaki	29	Support	No relief necessary
		Submitter supports the ongoing and further protection of Taranaki surf breaks.	Support noted.
50 – Te Kāhui o Taranaki Trust	30	Amend	Accept in part
		Submitter seeks amendment of the Plan by going through a proper process of consultation on the inclusion of nationally and regionally significant surf breaks noting that the names of many surf breaks are offensive and inappropriate.	Officers note that through the Coastal Plan review there has already been considerable consultation and engagement on the issue of surf break protection. An initial list of regionally significant surf breaks was adopted in the current Regional Policy Statement, which was adopted in 2010. However, through the Coastal Plan review additional investigations and engagement occurred. This included the commissioning of reports on <i>Taranaki Surf breaks of National Significance</i> , and <i>Regional Significance criteria for the Assessment of Surf Breaks</i> , consultation and seeking of feedback on draft Plan policies, a draft Plan and, more recently, the Proposed Plan. As part of the review, an innovative 'wave survey' was also carried out that allowed the community to inform the Council which surf breaks are values and why. This information was used to determine the appropriate level of protection for each surf break. Naming conventions for surf breaks have been a result of the community engagement to date. However, officers agree that the names of some surf breaks are culturally offensive and recommend investigating alternative more appropriate names for surf breaks identified in Schedule 7 and associated planning maps where it is practicable to do so. The Council will welcome any additional information regarding surfbreak names.
Further submissions –Te Rūnanga o Ngāti Mutunga (40), Te Korowai o Ngāruahine Trust (41), Te Atiawa (58)		Support	
Coastal water quality provisions			
	31	Other	No relief necessary

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
39 – Maniapoto Māori Trust Board		Submitter supports measures to ensure development pressures do not deteriorate coastal water quality.	Support noted.
Section 32 Evaluation Report			
41 – Te Korowai o Ngāruahine Trust	32	<p>Amend</p> <p>Submitter is seeking amendments to the Section 32 Evaluation Report, where relevant, to further highlight or reference cultural heritage values, principles and associations.</p>	<p>Accept</p> <p>The submitter is not seeking amendment to the Plan but is seeking amendment to the accompanying Section 32 Evaluation Report to further highlight or reference cultural heritage values, principles and associations.</p> <p>In accordance with the RMA, a Section 32AA Evaluation Report needs to be prepared to reflect the current state of the Coastal Plan Review. In the Section 32AA Evaluation Report amendments will be made, where relevant, to further highlight or reference cultural heritage values, principles and associations.</p>
Planning maps			
42 – Ngati Hine Hapū of Te Atiawa	33	<p>Amend</p> <p>Submitter seeks amendment to Plan maps (and associated GIS layers) to include and delineate offshore reefs based on information supplied by the submitter.</p>	<p>Accept</p> <p>Officers would welcome any additional information identifying sites of significance to Ngati Hine Hapū of Te Atiawa.</p> <p>Any coastal sites of significance data supplied to the Council need to be assessed in terms of the Section 6(e) of the RMA and discrete site dimensions established. The sites can then either be identified in Schedule 5B of the Plan or kept in 'silent' (confidential) files at the Council depending upon the submitter's preference.</p>
43 – Royal Forest and Bird Protection Society	34	<p>Amend</p> <p>Submitter seeks amendments to Plan maps (and associated GIS layers) to identify the extent of the coastal environment</p> <p>OR</p> <p>Alternatively amend the maps to identify an indicative extent of the coastal environment.</p>	<p>Accept</p> <p>Council has worked closely with New Plymouth and South Taranaki district councils in identifying and mapping coastal areas of outstanding natural character and outstanding natural features and landscapes. Both district councils have commenced or about to commence their respective district plan reviews, which includes a coastal protection zone (or equivalent) that is indicative of where natural coastal processes or qualities are significant.</p>
Further submissions – Fonterra (47)		Support	For the purposes of certainty and clarity to Plan readers, integrated management and to promote alignment between the respective regional and district plans, officers recommend that the Plan (and associated GIS layers and planning maps) be amended to include an indicative extent of the coastal environment that is aligned with the district plans.

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3.1 Plan introduction or background

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Vision and/or Māori guiding principles			
40 – Te Rūnanga o Ngāti Mutunga	35	<p>Amend</p> <p>Submitter seeks amendment to the Plan to reinstate (from Draft Coastal Plan) Māori cultural values or guiding principles at the forefront of the Plan AND Seek to see these Māori cultural values or guiding principles are better reflected throughout the Plan and, in particular, the rules.</p>	<p>Accept</p> <p>Based upon earlier iwi feedback on the Draft Coastal Plan, Māori cultural values or guiding principles at the forefront of that Plan were removed. It was suggested that the review of the Regional Policy Statement (scheduled to occur in 2020) represented a better opportunity for iwi to consider and confirm the guiding principles.</p> <p>Notwithstanding the above, and subject to agreement with other iwi agencies, Council will investigate the suitability and acceptability of the guiding principles with the intention that the Plan be amended to incorporate those principles.</p> <p>In addition, through other proposed Plan amendments (signalled in this report) sought by the submitter and others relating to tangata whenua values, Council will seek to see those principles incorporated throughout the Plan provisions.</p>
58 – Te Atiawa	36	<p>Amend</p> <p>Submitter seeks amendment to the Plan to reinstate (from Draft Coastal Plan) Māori guiding principles at the forefront of the Plan and seek to see them better reflected throughout the Plan and, in particular, the rules.</p>	<p>Accept</p> <p>Based upon earlier iwi feedback on the Draft Coastal Plan, Māori cultural values or guiding principles at the forefront of that Plan were removed. It was suggested that the review of the Regional Policy Statement (scheduled to occur in 2020) represented a better opportunity for iwi to consider and confirm the guiding principles.</p> <p>Notwithstanding the above, and subject to agreement with other iwi agencies, Council will investigate the suitability and acceptability of the guiding principles with the intention that the Plan be amended to incorporate those principles.</p> <p>In addition, through other proposed Plan amendments (signalled in this report) sought by the submitter and others relating to tangata whenua values, Council will seek to see those principles incorporated throughout the Plan provisions.</p>
Further submissions – Te Korowai o Ngāruahine Trust (41)		<p>Support</p>	<p>Notwithstanding the above, and subject to agreement with other iwi agencies, Council will investigate the suitability and acceptability of the guiding principles with the intention that the Plan be amended to incorporate those principles.</p> <p>In addition, through other proposed Plan amendments (signalled in this report) sought by the submitter and others relating to tangata whenua values, Council will seek to see those principles incorporated throughout the Plan provisions.</p>
	37	<p>Amend</p>	<p>Accept</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
61 – Te Rūnanga o Ngāti Ruanui Trust		Submitter seeks amendment to the vision statement of the Plan to include the word “water” to adequately reflect Taranaki and the coverage of the Plan.	Officers recommend amending last sentence of the vision statement to read: <i>This vision recognises the roles and responsibilities shared by all people in Taranaki to ensure the sustainable and focused protection of fresh water air, land (soil), water and coastal environments for economic, social, cultural and recreational purposes.</i>
Further submissions – Te Korowai o Ngāruahine Trust (41)		Support	
Section 1.2 – Purpose			
42 – Ngati Hine Hapū of Te Atiawa	38	Amend Submitter seeks amendment to the purpose statement of the Plan [Section 1.2] to state that the purpose of the Plan is to “direct” or “guide” the Taranaki Regional Council in coastal management under the RMA.	Decline Officers consider the purpose statement of the Plan to be consistent with the purpose statement for regional plans as set out in Section 63 of the RMA. Pursuant to Section 63 of the RMA, the purpose of regional plans is “[...] to assist a regional council to carry out its functions in order to achieve the purpose of the RMA.” Officers do not consider it necessary to amend the purpose statement of the Plan as requested.
Section 1.4 – Plan application			
43 – Royal Forest and Bird Protection Society	39	Amend Submitter supports 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 coastal marine area, including where those activities may have an adverse effect on outstanding values and significant indigenous biodiversity values outside of the coastal marine area.	Accept Officers recommend amendment to Section 1.4.1 to include a new sentence stating that while the rules in this Plan apply only to activities in the coastal marine area, nevertheless they include activities that can have an adverse effect on values and uses outside of the coastal marine area.
Further submissions – Transpower New Zealand Ltd (26)		Oppose in part	
45 – Powerco	40	Support Retain Sections 1.4.1 and 1.4.2 of the Plan as notified.	Accept Support noted subject to the minor amendment in response to the submitter (43) above.
46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	41	Support Retain Sections 1.4.1 and 1.4.2 of the Plan as notified.	Accept Support noted subject to the minor amendment in response to the submitter (43) above.

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Section 1.6 – Mana whenua			
21 – Climate Justice Taranaki	42	Amend	Decline
		Submitter seeks amendment to Section 1.6 of the Plan to note Ngāti Maru are negotiating with the Crown regarding their Treaty of Waitangi settlement.	Officers recommend declining the relief sought noting that this information is not relevant within the context of the Coastal Plan. Ngāti Maru Treaty of Waitangi settlement claims are unlikely to extend to the Taranaki coastal marine area. In the event, that this assumption is wrong, appropriate changes will be made to the Plan.
60 – Te Kaahui o Rauru	43	Amend	Accept
		Submitter seeks amendment to Section 1.6 of the Plan to read: <i>The resources of Tangaroa has have provided [...]</i>	The submitter prefers to refer to the Atua itself instead of using the anthropogenic term “resources”. Officers recommend granting the relief sought.
60 – Te Kaahui o Rauru	44	Amend	Accept in kind
		Submitter seeks amendment to Section 1.6 of the Plan to replace the word “management” with “relationship” to describe interactions with the natural environment, on line 3 of paragraph 5.	Officers recommend granting the relief in part by deleting reference to “sustainable coastal management” and instead making some consequential changes to focus on the relationship of iwi o Taranaki with the coastal environment. The revised paragraph would read as follows: <i>Sustainable coastal management, through Kkaitiakitanga and tikanga, is at the heart of the relationship between the iwi o Taranaki and the coastal environment. This Plan has integrated the values of Taranaki iwi throughout Plan provisions.</i>
60 – Te Kaahui o Rauru	45	Amend	Accept
		Submitter seeks that the Plan communicate, with potential Plan users, the likelihood of the need for consultation with hapū when engaging with non-permitted activities. Submitter seeks amendment to Section 1.6 of the Plan to include the importance of hapū, alongside iwi, as tangata whenua.	Officers recommend granting the relief sought by amending Section 1.6 to include hapū alongside iwi.
61 – Te Rūnanga o Ngāti Ruanui Trust	46	Amend	Accept
		The submitter expresses that tangaroa is still currently a source of rongoa and disagrees with the use of the word “was” as the word indicates past tense. The submitter further notes that tangaroa is a current source of mahinga kai.	Officers agree that tangata whenua relationships with Tangaroa are current and ongoing as well as historic and agree to the relief sought.

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		Submitter seeks amendment to first paragraph of Section 1.6 of the Plan to read: [...] <i>These resources are were integral to the lives of the people who occupyiedthe settlements adjoining the coastline. Tangaroa providesd for these people materially, actsed as a highway for travel, is was a source of <u>mahinga kai (food and resource)</u>, rongoa (medicine), aidsed their well-being and providesd spiritual sustenance. [...]</i>	
Further submissions – Te Atiawa (58)		Support	
Section 1.7 – Coastal management areas			
32 – Port Taranaki	47	Support Retain Section 1.7.4 of the Plan as notified.	Accept Support noted. Section 1.7 is retained subject to minor amendments as requested by other submitters.
43 – Royal Forest and Bird Protection Society	48	Amend Submitter opposes the coastal management area approach adopted in the Plan as it is unclear as to how it applies to the wider coastal environment.	Decline The coastal management areas approach is specific to the coastal marine area. It is based upon a similar regime that has been successfully applied through the current Coastal Plan and effectively is a zonal approach identifying five 'coastal management areas' based upon shared values, characteristics, vulnerabilities or sensitivities, and management needs. The 'zones' bundle compatible activities or effects of those activities together and restricts activities which are incompatible. Of note, management responses may vary within the coastal management area (and at a finer spatial scale) according to the particular sites and values triggered within a particular locality.
Further submissions – Port Taranaki Ltd (32)		Oppose	
43 – Royal Forest and Bird Protection Society	49	Amend If the coastal management area approach is to be retained, submitter seeks amendment to Section 1.7.1 of the Plan to: <ul style="list-style-type: none"> clarify how the coastal environment landward of the coastal marine area is considered under this approach clarify how this relates with the <i>New Zealand Coastal Policy Statement</i> and relevant policies in the Plan amend reference from Schedule 1 to Schedule 2. 	Accept in part Officers agree to some amendments to further clarify how coastal management areas apply to the wider coastal environment. However, officers note that the introductory sentence to Section 1.7 explicitly states that the five coastal management areas apply to the coastal marine area and that part of Policy 1 setting out the coastal management area framework is specific to the coastal marine area.

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Further submissions – Department of Conservation (29)		Support	<p>In relation to further amendments sought by the submitter in relation to Section 1.7.1 of the Plan, officers do not believe it is necessary or appropriate for the Plan to detail how the coastal management approach applies to the <i>New Zealand Coastal Policy Statement</i> or policies in the Plan. Such matters are more appropriately addressed in the Section 32 Evaluation Report.</p> <p>In relation to amending reference in the Section to refer to Schedule 2 instead of Schedule 1, the relief sought is declined. Schedule 1 is specific to the coastal management areas and is deliberately confined to the coastal marine area. Schedule 2 relates only to coastal areas of outstanding value and, because of the need to identify significant values across the broader landscape, necessarily includes areas landward of the coastal marine area.</p>
43 – Royal Forest and Bird Protection Society	50	<p>Amend</p> <p>Submitter seeks clarification as to whether coastal management areas – Estuaries Unmodified and Estuaries Modified are determined on the basis of values and characteristics under Policies 11, 13 and 15 of the <i>New Zealand Coastal Policy Statement</i>, or on the basis of modification. If the later, submitter seeks amendment to the Plan to explain that the Plan will protect values and characteristics of these estuaries as set out in Policies 8, 9 and 14 of the Plan.</p>	<p>No relief necessary</p> <p>Estuaries Unmodified and Estuaries Modified are based on estuaries identified in the current Coastal Plan and their differing management needs taking into account the presence or otherwise of settlements adjacent to the estuaries. Of note Taranaki has few major estuaries.</p> <p>Officers do not believe it necessary or appropriate to amend the Plan to explain that the Plan will protect values and characteristics of these estuaries as set out in Policies 8, 9 and 14 of the Plan. As explicitly stated in Section 5 of the Plan and in the policy references for rules, all General Policies need to be considered together. Together these policies will protect the values and characteristics of these estuaries as set out in Policies 8, 9 and 14.</p>
43 – Royal Forest and Bird Protection Society	51	<p>Amend</p> <p>Submitter seeks amendment to Section 1.7.5 of the Plan to clarify whether the Open Coast coastal management area refers to the remaining area of the coastal marine area or the wider coastal environment</p> <p>AND</p> <p>Clarify how the values and characteristics to be protected under Policies 11, 13 and 15 of the <i>New Zealand Coastal Policy Statement</i> will be provided for in these areas.</p>	<p>No relief necessary</p> <p>No relief is considered necessary. The first sentence of Section 1.7.5 already states that the Open Coast coastal management area is that area of the coastal marine area not covered by the other management areas.</p> <p>In relation to the submitter seeking clarification on how values and characteristics of the Open Coast are to be protected in accordance with Policies 11 [Indigenous biodiversity], 13 [Preservation of natural character] and 15 [Natural features and landscapes] of the <i>New Zealand Coastal Policy Statement</i>, the submitter is referred to Policies 8, 9, 10, 11, 12, 13 and 14 of the Plan and the relevant rules. All General Policies in the Plan need to be considered together.</p>
Further submissions – Powerco (45), Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd (46)		Support	

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
45 – Powerco	52	<p>Amend</p> <p>Submitter supports Section 1.7 of the Plan and the inclusion of the five coastal management areas but seeks amendment to ensure that the presence of existing infrastructure in all of these areas is appropriately recognised by including the following sentence to paragraphs 1.7.1 to 1.7.3 as follows:</p> <p><u><i>These areas may contain regionally important infrastructure.</i></u></p>	<p>Accept in kind</p> <p>A number of submitters sought to have their uses, values or particular interests explicitly identified in the coastal management areas, despite such uses and values being common to most if not all coastal management areas.</p> <p>Officers recommend minor and inconsequential changes to the first paragraph of Section 1.7 of the Plan to clarify that coastal management areas are areas or zones dividing the coastal marine area for management purposes and for which specific rules apply. This will avoid the need for unnecessary and potentially redundant commentary in the Plan that attempts to describe common attributes, characteristics and values that in all likelihood apply across all coastal management areas such as the presence of regionally important infrastructure (plus other uses and values).</p> <p>The proposed revised paragraph would read as follows:</p> <p><i>The coastal marine area has been divided into five management areas. This division recognises that some areas have different management needs than other areas. These areas have been mapped in Schedule 1 and specific rules apply. The coastal management areas are as follows: [...]</i></p>
46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	53	<p>Amend</p> <p>Submitter supports Section 1.7 of the Plan and the inclusion of the five coastal management areas but seeks amendment to ensure that the presence of existing infrastructure in all of these areas is appropriately recognised by including the following sentence to paragraphs 1.7.1 to 1.7.3 as follows:</p> <p><u><i>These areas may contain regionally important infrastructure.</i></u></p>	<p>Accept in kind</p> <p>A number of submitters sought to have their uses, values or particular interests explicitly identified in the coastal management areas, despite such uses and values being common to most if not all coastal management areas.</p> <p>Officers recommend minor and inconsequential changes to the first paragraph of Section 1.7 of the Plan to clarify that coastal management areas are areas or zones dividing the coastal marine area for management purposes and for which specific rules apply. This will avoid the need for unnecessary and potentially redundant commentary in the Plan that attempts to describe common attributes, characteristics and values that in all likelihood apply across all coastal management areas such as the presence of regionally important infrastructure (plus other uses and values).</p> <p>The proposed revised paragraph would read as follows:</p> <p><i>The coastal marine area has been divided into five management areas. This division recognises that some areas have different management needs than other areas. These areas have been mapped in Schedule 1 and specific rules apply. The coastal management areas are as follows: [...]</i></p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Section 2.1 – Statutory and planning framework			
19 – South Taranaki District Council	54	Amend	No relief necessary
		Submitter seeks amendment to Section 2.1 [Statutory and planning framework] of the Plan to reference a commitment to integrated management of resources, recognition of the role of district plans, and working with the territorial local authorities of the region.	Officers believe that Section 2.1 is not the appropriate place to detail commitments to integrated management and note that such matters have been addressed elsewhere in the Plan, particularly Policy 2 [Integrated management] but also the methods of implementation.
26 – Transpower NZ Ltd	55	Support	Accept
		Retain reference to the <i>National Policy Statement on Electricity Transmission 2008</i> within Section 2.1 of the Plan.	Support noted. Reference is retained as notified.
40 – Te Rūnanga o Ngāti Mutunga	56	Amend	Accept
		Submitter seeks amendment to Section 2.1 [Statutory and planning framework] of the Plan to reference the <i>Ngāti Mutunga Claims Settlements Act 2006</i> and the <i>Ngāti Mutunga Iwi Environmental Management Plan</i> and other iwi settlement legislation and iwi environmental management plans.	Officers agree to the relief sought. Officers recommend amending Section 2 to include a new sub section relating to iwi management plans and to expand the scope of Section 2.5 [Other legislation] to reference Treaty of Waitangi settlement legislation.
42 – Ngati Hine Hapū of Te Atiawa	57	Amend	Decline
		Submitter seeks amendment of Section 2.1 [Statutory and planning framework] of the Plan to state that the purpose of the Plan is to “direct” or “guide” the Council in coastal management under the RMA.	Officers consider that the commentary in Section 2.1 is consistent with the purpose statement for regional plans as set out in Section 63 of the RMA. Pursuant to Section 63 of the RMA, the purpose of regional plans is “...to assist a regional council to carry out its functions in order to achieve the purpose of the RMA”.
48 – Taranaki District Health Board	58	Amend	Decline
		Submitter seeks amendment of Section 2.1 [Statutory and planning framework] of the Plan to include a section on the principles of Te Tiriti o Waitangi and how these principles guide the work undertaken in this area.	Officers recommend declining the relief sought. Officers note that the Regional Policy Statement already includes a section and discussion on taking into account the principles of the Treaty of Waitangi and includes a declaration of understanding between iwi o Taranaki and the Taranaki Regional Council. Officers do not believe it necessary for all subordinate planning documents to repeat such information. Furthermore, there are risks in doing so through unintended inconsistencies in wording etc.
Further submissions –Te Rūnanga o Ngāti (40), Te Korowai o Ngāruahine Trust (41), Te Atiawa (58)		Support	Officers note that the contents of the Proposed Plan are consistent with the matters set out in Section 67 [Content of regional plans] of the RMA. Given the Government is in the process of developing national planning standards that will

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
			<p>require councils across New Zealand to adopt a particular structure and form – some care must be necessarily had with adopting too much 'optional' content. In the drafting of the Plan Council has deliberately limited introductory and background content and detail so as to focus on the matters that must be included in a Plan (objectives, policies and rules).</p>
Section 2.2 – New Zealand Coastal Policy Statement			
43 – Royal Forest and Bird Protection Society	59	<p>Amend</p> <p>Submitter seeks amendment to Section 2.2 [New Zealand Coastal Policy Statement] of the Plan to read:</p> <p><i>The New Zealand Coastal Policy Statement 2010 (New Zealand Coastal Policy Statement) contains objectives and policies to address key national matters facing the coastal environment and to achieve the purpose of the RMA. <u>By giving effect to the New Zealand Coastal Policy Statement in this Plan Council's responsibilities to provide for matters of national importance under section 6 of the RMA is also achieved for the coastal environment.</u></i></p> <p><i>Policies within the New Zealand Coastal Policy Statement address matters including:</i></p> <p>[...]</p> <p><u>protection of</u> indigenous biological diversity.</p>	<p>Accept in part</p> <p>The submitter believes the opening paragraph of Section 2.2 of the Plan to be misleading as the <i>New Zealand Coastal Policy Statement</i> is not limited to “key national matters” but is to achieve the purpose of the RMA in relation to the coastal environment.</p> <p>Officers seek further clarification from the submitter on this point as the current wording of the Plan explicitly notes that it contains objectives and policies to address key national matters facing the coastal environment <u>and</u> to achieve the purpose of the RMA.</p> <p>The submitter seeks an amendment to Section 2.2 to note that by giving effect to the <i>New Zealand Coastal Policy Statement</i> in this Plan Council's responsibilities to provide for matters of national importance under section 6 of the RMA are also achieved for the coastal environment. At best this statement and level of detail/discussion is unnecessary as Section 2 is only meant to be a high level overview of statutes and regulations relevant to the Coastal Plan. At worst the statement is misleading as while this Plan is likely to be the primary plan for giving effect to the <i>New Zealand Coastal Policy Statement</i> and coastal matters, it is not the only regulatory document. Other plans, including the Regional Freshwater Plan, will also assist to give effect to the <i>New Zealand Coastal Policy Statement</i> and national matters of importance under section 6 of the RMA.</p> <p>In relation to the list of matters covered by the <i>New Zealand Coastal Policy Statement</i> policies, officers recommend granting the relief sought by the submitter by amending reference to “indigenous biological diversity” to refer to “protection of indigenous biological diversity”.</p>
45 – Powerco		Amend	Decline

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		Submitter seeks amendment to Section 2.2 [New Zealand Coastal Policy Statement] of the Plan to specifically recognise and provide for infrastructure. This could be achieved by adding an additional bullet point: <u>Recognising and providing for infrastructure.</u>	A number of submitters sought to have their areas of interests explicitly identified in the commentary on the <i>New Zealand Coastal Policy Statement</i> , in this case recognition and provision for infrastructure. Officers note the commentary is deliberately high level and that infrastructure is already adequately covered under references to development. Officers suggest that the Plan objectives, policies and rules adequately recognise and provide for infrastructure.
Further submissions – Transpower (26)		Support	
46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	60	Amend Submitter seeks amendment to Section 2.2 [New Zealand Coastal Policy Statement] of the Plan to specifically recognise and provide for infrastructure. This could be achieved by adding an additional bullet point: <u>Recognising and providing for infrastructure.</u>	Decline The submitter wishes to extend the scope of Section 2.2 of the Plan to include infrastructure. A number of submitters sought to have their areas of interests explicitly identified in the commentary on the <i>New Zealand Coastal Policy Statement</i> , in this case recognition and provision for infrastructure. Officers note the commentary is deliberately high level that infrastructure is already adequately covered under references to development. Officers suggest that the Plan objectives, policies and rules adequately recognise and provide for infrastructure.
Section 2.3 – Marine and Coastal Area (Takutai Moana) Act 2011			
41 – Te Korowai o Ngāruahine Trust	61	Amend Submitter seeks amendment to Section 2.3 [Marine and Coastal Area (Takutai Moana) Act 2011] of the Plan to note that the iwi of Taranaki have claims before the Crown for both customary marine title and protected customary right and explain to the community what these statutory acknowledgements will mean.	Accept Officers agree to the relief sought and recommend amending Section 2.3 of the Plan to insert a new sentence that notes that the iwi of Taranaki have claims before the Crown for both customary marine title and protected customary right. Commentary preceding the insertion already explains to the community what these statutory acknowledgements will mean.
Further submissions – Te Atiawa (58)		Support	
46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	62	Support Retain Section 2.3 of the Plan as notified.	Accept in part The submitter's support is noted. However, officers note that in response to relief sought by another submitter, minor amendments have been made to Section 2.3 [Marine and Coastal Area (Takutai Moana) Act 2011] to further explain that the iwi of Taranaki have claims before the Crown for both customary marine title and protected customary rights.

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Section 2.5 – Other legislation			
43 – Royal Forest and Bird Protection Society	63	<p>Amend</p> <p>Submitter considers it helpful to explain that other legislation applies in the coastal environment and to outline the relationship these have to the Plan. In particular, Submitter seeks amendment to Section 2.5 [Other legislation] of the Plan to:</p> <ul style="list-style-type: none"> consider the legislation and Acts under Policy 5 of the <i>New Zealand Coastal Policy Statement</i> recognise the relationship between the Plan and the Exclusive Economic Zone and how the Plan addresses, or not, the effects that extend beyond the coastal marine area or into the coastal marine area explain the relationship between this Plan and other Acts/legislation. 	<p>Decline</p> <p>Officers recommend declining the relief sought.</p> <p>Section 2.5 of the Plan already highlights the need for activities to ensure they comply with other relevant legislation, regulations and bylaws but officers do not believe it necessary to specify or detail the relationship these might have with the Plan. Such detail was not required for the <i>New Zealand Coastal Policy Statement</i> and nor is it required for regional plans.</p> <p>The contents of the Proposed Plan are consistent with the matters set out in Section 67 [Content of regional plans] of the RMA. Given the Government is in the process of developing national planning standards that will require councils across New Zealand to adopt a particular structure and form – some care must be necessarily had with adopting too much 'optional' content. In the drafting of the Plan, Council has deliberately limited introductory and background content and detail so as to focus on the matters that must be included in a Plan (objectives, policies and rules).</p> <p>Officers note that, in the development of the Plan, full consideration has been given to other relevant statutes and regulations. However, officers do not believe that it is necessary for the Plan to detail/explain the relationship between the Plan and other statutes. The list of legislation in Section 2.5 is not an exhaustive list. However, it is intended to contain the most relevant statutes that may apply to the coastal marine area and already identifies the <i>Conservation Act</i> which is identified in Policy 5 of the <i>New Zealand Coastal Policy Statement</i>.</p>
Further submissions– Trans-Tasman Resources Ltd (6)		Oppose in part/neutral in part	
58 – Te Atiawa	64	<p>Amend</p> <p>Submitter seeks amendment to Section 2.5 [Other legislation] of the Plan to include iwi settlement legislation – specifically, the <i>Te Atiawa Iwi Claims Settlement Act 2016</i>.</p>	<p>Accept</p> <p>The submitter believes that it may be useful for Plan users to know that the iwi of Taranaki have claims before the Crown for both customary marine title and protected customary right.</p> <p>Officers agree to the relief sought. Officers recommend amending Section 2 of the Plan to include a new sub section relating to iwi management plans and to expand the scope of Section 2.5 [Other legislation] to reference Treaty of Waitangi settlement legislation, including the <i>Te Atiawa Iwi Claims Settlement Act</i> as requested by the submitter.</p>
	65	Amend	Accept

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
60 – Te Kaahui o Rauru		Submitter seeks amendment to Section 2.5 [Other legislation] of the Plan to include iwi settlement legislation – specifically, the <i>Nгаа Rauru Kiihahi Claims Settlement Act 2005</i> .	The submitter believes that it may be useful for Plan users to know that the iwi of Taranaki have claims before the Crown for both customary marine title and protected customary right. Officers agree to the relief sought. Officers recommend amending Section 2 of the Plan to include a new sub section relating to iwi management plans and to expand the scope of Section 2.5 [Other legislation] to reference Treaty of Waitangi settlement legislation, including the <i>Nгаа Rauru Kiihahi Claims Settlement Act</i> as requested by the submitter.
NEW Section 2.6 – Iwi environmental management plans			
50 – Te Kāhui o Taranaki Trust	66	Amend Submitter seeks amendment of the Plan to include a new Section addressing iwi environmental management plans.	Accept Officers recommend granting the relief sought by the submitter by including a new Section addressing iwi environmental management plans.
Further submissions – Te Rūnanga o Ngāti Mutunga (40), Te Korowai o Ngāruahine Trust (41), Te Atiawa (58)		Support	
Section 3.1 – Taranaki coastal environment			
6 – Trans-Tasman Resources Ltd	67	Support Submitter supports Plan overview of the Taranaki coastal environment as it appropriately recognises that some activities require a coastal location and recognises that Taranaki is a mineral producing region to New Zealand.	Accept Support noted.
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Oppose	
7 – Waikato Regional Council	68	Amend The submitter notes that a source of sediment along the Waikato – Taranaki coastline is Mount Taranaki While the exact quantity of sediment that travels along this coast is unknown, both activities inside and outside of the coastal marine area may affect the supply of the sediment and have a corresponding effect on coastal erosion and seeks amendment to Section 3.1 (or Policy 2 or similar relief) of the	No relief necessary Officers do not believe it is necessary to make any amendments to Section 3.1 of the Plan to further highlight that activities outside of the coastal marine area can have effects on the coastal marine area. Such matters are already acknowledged in the commentary in Section 3.1 relating to integrated management and coastal water quality. Officers also note that this issue is further addressed within Policy 2(c) of the Plan.

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		Plan to acknowledge that activities outside of the coastal marine area can have an effect on the coastal marine area.	
Further submissions – Te Rūnanga o Ngāti Mutunga (40), Te Korowai o Ngāruahine Trust (41), Te Atiawa (58), Te Rūnanga o Ngāti Ruanui Trust (61)		Support	
21 – Climate Justice Taranaki	69	Amend Submitter seeks amendment to text on 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.	Decline Officers acknowledge that the current Government has recently changed its stance on offshore oil and gas permits. However, officers consider that amending the Plan to follow suit is an unnecessary level of detail. Furthermore, the proposed amendment could potentially become out dated and inaccurate should this Government or successive government's change their position.
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Support	
21 – Climate Justice Taranaki	70	Amend Submitter seeks amendment to page 15 [Coastal hazards] of the Plan to read: <i>[...] The risk of, or vulnerability to, coastal hazards may increase over time due to climate change and sea level rise.</i>	Accept Officers recommend granting the relief sought by the submitter and amending the commentary to note that climate change and sea level rise are heightening the risk of coastal hazards. This relief and other reliefs sought by submitters reads: <i>The risk of, or and vulnerability to, coastal hazards may will increase over time, <u>for instance</u> due to climate change and sea level rise.</i>
26 – Transpower NZ Ltd	71	Amend Submitter seeks amendment to text in Section 3.1 of the Plan on appropriate use and development to read: <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> Taranaki's coastal resources and developments play a crucial role in both the regional and national economy [...]</i>	Accept The submitter seeks amendments to the commentary to make it clear within the 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 coastal resource itself. Officers agree that there are a number of instances where the location of infrastructure or activities in the coastal marine area is appropriate taking into account technical, operational or locational requirements. Officers recommend accepting the amendment as requested by the submitter.
Further submissions – Powerco (45), Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd (46)		Support in part	

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Further submissions –Fonterra (47)		Support	
40 – Te Rūnanga o Ngāti Mutunga	72	Support Submitter supports the discussions on the coastal environment in Section 3.1 of the Plan and the aim to achieve integrated management of the coastal marine area (but are not convinced integrated management is reflected in the rules of the Plan).	No relief necessary Officers note the submitter's support. In relation to the submitter's concerns that integrated management is not reflected in the rules, officers note that while the rules pertain only to the coastal marine area (as intended), all rules are subject to the General Policies which cover the wider coastal environment and standards, terms and conditions and/or matters of discretion seek to address integrated management issues where relevant.
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Support	
41 – Te Korowai o Ngāruahine Trust	73	Amend Submitter seeks amendment to 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 coastal marine area environment, to promote readers' awareness and knowledge about the depth of relationship that Māori have with the coast.	Accept Officers recommend minor changes to Section 3.1 of the Plan as requested by the submitter to include tauranga waka landing sites. The amended section reads: <i>Wāhi tapu, sites, or places of cultural significance, including tauranga waka landing sites, taonga, and customary resources, are integral to the identity, well-being and cultural integrity of tangata whenua.</i>
Further submissions – Te Atiawa (58), Te Rūnanga o Ngāti Ruanui Trust (61)		Support	
43 – Royal Forest and Bird Protection Society	74	Amend Submitter seeks amendment to Section 3.1 of the Plan by: <ul style="list-style-type: none"> amending the third paragraph to recognise existing pressures on the coastal environment, including from beyond the coastal marine area, and that low current demand does not mean management of effects can be relaxed amending the text under "Integrated management" to recognise: the effects of subdivision, use and development on land in the coastal environment on the coastal marine area; 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. 	Accept in part Of note, proposals in this Plan represent an overall increase in the level of protection for coastal uses and values. As noted in previous requests for added commentary or background information, officers seek that background information, including Section 3.1 which provides an overview of the Taranaki coastal environment, be kept at a high level. Notwithstanding the above, officers recommend minor amendments to Section 3.1 that partially address the reliefs sought by the submitter. It is proposed that the third paragraph of Section 3.1 be amended to include: <i>Notwithstanding generally low use and development, it remains important that adverse effects of use and development continue to be avoided, remedied or mitigated and that, as far as is practicable, take into account the wider coastal environment.</i>
Further submissions – Trans-Tasman Resources Ltd		Oppose	

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Support	Other consequential changes are proposed in the commentary under integrated management to note that demand for activities and the effects of subdivision, use and development on land in the coastal environment can be high. However, officers do not recommend commentary being expanded to discuss the specifics of providing for the migration of coastal habitats landward due to climate change.
43 – Royal Forest and Bird Protection Society	75	Amend	Accept in part
		Submitter seeks further amendment to Section 3.1 of the Plan by deleting the text under “ <i>Appropriate use and development</i> ”. Alternatively amend to address as per submitters previous comments made on this matter.	The submitter suggests that it is not appropriate to consider activities as “ <i>appropriate use and development</i> ” on the basis of the benefits of the activities. Officers agree noting that the commentary does not get into the specifics of what is appropriate or not. Such determinations can only be made in reference to the Plan policies. Accordingly officers recommend amending the heading to “ <i>Use and development</i> ” to more accurately reflect this section’s content. However, officers do not recommend deleting the text itself.
Further submissions – Transpower (26)		Oppose	
43 – Royal Forest and Bird Protection Society	76	Amend	Accept in part
		Submitter seeks further amendment to Section 3.1 of the Plan by amending the text under “ <i>Natural and historic heritage</i> ” to include “ <i>intrinsic</i> ” in the list of values (in the first paragraph) and to specify that natural heritage captures the characteristics and values in Policies 11, 13 and 15 of the <i>New Zealand Coastal Policy Statement</i> (or use wording consistent with those policies).	Officers recommend amending Section 3.1 of the Plan to include “ <i>intrinsic</i> ” in the list of values (in the first paragraph) under “ <i>Natural and historic heritage</i> ”. However, officers do not believe it is necessary to specify that natural heritage captures the characteristics and values in Policies 11, 13 and 15 of the <i>New Zealand Coastal Policy Statement</i> .
	77	Amend	Accept

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd		<p>Submitter seeks amendment to the coastal hazards commentary in Section 3.1 of the Plan to read:</p> <p><i>The coastal environment is at high risk of coastal hazards area. Risks include tornados, coastal erosion, tsunami, storm surges, and cliff rock falls and slumps. The risk of, er and vulnerability to, coastal hazards may increase over time, <u>for instance</u> due to climate change and sea level rise.</i></p> <p><i>Although most natural processes that cause coastal hazards originate at sea, the major effects of these processes are nearly always felt on land. The Taranaki coastline is continually influenced by the natural forces of wind and waves. This, coupled with soft geology found in some localities around the coastline, means that the most significant coastal hazard in Taranaki is coastal erosion. Although coastal erosion and other hazards are generally a natural phenomenon, human activity in the coastal marine area may influence the susceptibility of people, property and the environment to loss or damage on account of coastal hazards. <u>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.</u></i></p> <p><i>Similarly, activities in the coastal marine area may also impact on the health or safety of people or property, including aircraft or navigational safety. It is important that these activities do not use and development of the coastal marine area does not increase coastal hazard risk or pose a threat to the health and safety of people or property (refer 7 below).</i></p>	<p>Officers recommend granting the relief sought in addition to the reliefs sought by other submitters. The amended section reads:</p> <p><i>The coastal environment is at high risk of coastal hazards area. Risks include tornados, coastal erosion, tsunami, storm surges, and cliff rock falls and slumps. The risk of, er and vulnerability to, coastal hazards <u>may will</u> increase over time, <u>for instance</u> due to climate change and sea level rise.</i></p> <p><i>Although most natural processes that cause coastal hazards originate at sea, the major effects of these processes are nearly always felt on land. The Taranaki coastline is continually influenced by the natural forces of wind and waves. This, coupled with the soft geology found in some localities around the coastline, means that the most significant coastal hazard in Taranaki is coastal erosion. Although coastal erosion and other hazards are generally a natural phenomenon, human activity in the coastal marine area may influence the susceptibility of people, property and the environment to loss or damage on account of coastal hazards. <u>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.</u></i></p> <p><i>Similarly, activities in the coastal marine area may also impact on the health or safety of people or property, including aircraft or navigational safety. It is important that these activities do not use and development of the coastal marine area does not increase coastal hazard risk or pose a threat to the health and safety of people or property (refer 7 below).</i></p>
Further submissions – Taranaki Energy Watch (51)		Oppose in part	
58 – Te Atiawa	78	<p>Support</p> <p>Submitter notes support for the discussion on the coastal environment which includes integrated management, coastal water quality, appropriate use and development, natural and historic heritage, tangata whenua values and relationships, public amenity and enjoyment and coastal hazards.</p>	<p>Accept</p> <p>Support noted.</p>
Section 3.2 – Managing the Taranaki coastal environment			
		Support	Accept

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
6 – Trans-Tasman Resources Ltd		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.	Support noted.
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Oppose	
26 – Transpower NZ	79	Support	Accept
		Retain matters identified in Section 3.2 of the Plan to be addressed by Plan objectives, policies, rules and methods.	Support noted.
40 – Te Rūnanga o Ngāti Mutunga	80	Amend	Accept kind
		Submitter notes concerns that public access is not always appropriate, in this case, for cultural and ecological reasons. Submitter seeks amendment to point 6 in Section 3.2 [Matters to be addressed] of the Plan to read: <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>	Officers agree that there are instances where coastal public access is not appropriate in addition to those mentioned by the submitter (e.g. public health and safety). These are also outlined later in Policy 17. Officers therefore recommend minor amendments to bullet point 6 to read: <i>6. Ensuring people can continue to access, use and enjoy the Taranaki coast, where and when it is appropriate to do so.</i>
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Support	
46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	81	Amend	Accept
		Submitter supports Section 3.2 [Matters to be addressed] of the Plan subject to amending bullet point 7 to read: <i>7. Ensuring use and development of the coastal marine area does not increase coastal hazard risk to unacceptable levels or pose a threat to the health and safety of people and property.</i>	Officers recommend granting the relief.
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Oppose	
57 – Heritage New Zealand	82	Amend	Decline
		The submitter requests that Section 3.2 [Matters to be addressed] bullet point 5 be amended to refer to all “Māori” in place of “tangata whenua” to follow similar wording within the RMA. The submitter suggests that iwi/hapū that no longer hold mana whenua can still have important relationships with an area, although they no	Officers note that iwi, hapū and whanau themselves have not commented on this issue, neither regionally nor from the wider Māori community. In this instance tangata whenua is considered the appropriate term as tangata whenua appropriately recognises Māori who historically originate from this region

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		<p>longer have mana whenua, and such situations need to be provided for within this objective.</p> <p>Submitter seeks amendment to bullet point 5 in Section 3.2 [Matters to be addressed] of the Plan to read:</p> <p><i>5. Ensuring the relationship of <u>Māori tangata whenua, including their traditions and cultural values and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga</u> are recognised and provided for in the management of Taranaki's coastal environment.</i></p>	<p>and have a recognised relationship with the region. Generically using "Māori" in this context is too broad and inclusive and would include Māori who do not have the same special relationship with the region. In addition, tangata whenua are given specific recognition with the RMA. Officers suggest that it is not appropriate to give all Māori the same recognition within the Plan as the local iwi and hapū that hold mana whenua.</p>
58 - Te Atiawa	83	<p>Amend</p> <p>Submitter supports how the Council intends to manage the Taranaki coastal environment as outlined in Section 3.2 of the Plan, however, the submitter's concerns are that public access will not always be appropriate, in this case, for cultural reasons and requests amending bullet point 6 to read:</p> <p><i>6. Ensuring people can continue to access, use and enjoy the Taranaki Coast <u>where cultural values are not adversely impacted upon.</u></i></p>	<p>Accept in kind</p> <p>There are other circumstances, where coastal public access is not appropriate (e.g. ecological and public health and safety). These are outlined later in Policy 17. Officers therefore recommend minor amendments to bullet point 6 to read:</p> <p><i>6. Ensuring people can continue to access, use and enjoy the Taranaki coast, <u>where and when it is appropriate to do so.</u></i></p>
Further submissions – Te Korowai o Ngāruahine Trust (41), Te Rūnanga o Ngāti Ruanui Trust (61)		Support	

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3.2 Objectives

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Objective 1 – Integrated management			
2 – Federated Farmers	84	Support	Accept
		Submitter supports Objective 1 of the Plan as notified.	Objective 1 retained as notified.
6 – Trans-Tasman Resources Ltd	85	Support	Accept
		Submitter supports Objective 1 of the Plan as notified.	Objective 1 retained as notified.
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Oppose	
19 – South Taranaki District Council	86	Amend	Decline
		Submitter seeks amendment of Objective 1 of the Plan to add reference to working cooperatively with the territorial local authorities and iwi of the region.	The relief sought by the submitter introduces an unnecessary level of specificity to the Plan objectives and risks excluding other elements of integrated management that are addressed later on in the policies and methods. Officers suggest it is more appropriate to provide this level of detail in the policies and methods that follow. Of particular note, the detail sought by the submitter is already included in Policy 2(g) of the Plan, which refers to working cooperatively with territorial authorities and tangata whenua (and others) and supporting methods of implementation.
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Support	
20 – Meridian Energy Limited	87	Amend	Decline
		Submitter seeks amendment of Objective 1 of the Plan to read: <i>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.</i>	Pursuant to Section 63 of the RMA, the purpose of regional plans is to assist a regional council to carry out its functions in order to achieve the purpose of the RMA. Officers therefore do not consider it appropriate to have objectives to manage activities such as subdivision, which clearly falls outside its statutory functions and where achievement of the objective (or otherwise) lies with other parties (i.e. territorial authorities). Of note, subdivision is a form of use and is already implicitly addressed in Objective 1 of the Plan.
35 – Radio New Zealand Ltd	88	Support	Accept
		Retain Objective 1 of the Plan as notified.	Objective 1 retained as notified.
	89	Amend	Decline

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
43 – Royal Forest and Bird Protection Society		Submitter seeks amendment of Objective 1 of the Plan to read: <i>Management of the coastal environment, including the effects of <u>subdivision</u>, use and development on land, air and fresh water, is carried out in an integrated manner, <u>including between regional and district council functions</u>.</i>	Pursuant to Section 63 of the RMA, the purpose of regional plans is to assist a regional council to carry out its functions in order to achieve the purpose of the RMA. Officers therefore do not consider it appropriate to have objectives to manage activities such as subdivision, which clearly falls outside its statutory functions and where achievement of the objective (or otherwise) lies with other parties (i.e. territorial authorities). In terms of suggested amendments to highlight integrated management between regional and district functions, officers further suggest it would be more appropriate to provide this level of detail in the policies and methods that follow. Of note, the detail sought by the submitter is already included in Policy 2(g) of the Plan, which refers to working cooperatively with territorial authorities (and others) and supporting methods of implementation. However, the Department of Conservation and many other agencies also have an important role to play.
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Support	
45 – Powerco	90	Support Retain Objective 1 of the Plan as notified.	Accept Objective 1 retained as notified.
Further submissions – Port Taranaki Ltd (32)		Support	
46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	91	Support Retain Objective 1 of the Plan as notified.	Accept Objective 1 retained as notified.
47 – Fonterra	92	Support Retain Objective 1 of the Plan as notified.	Accept Objective 1 retained as notified.
Objective 2 – Appropriate use and development			
2 – Federated Farmers	93	Support Retain Objective 2 of the Plan as notified.	Accept Objective 2 is retained subject to minor amendments as requested by other submitters.
6 – Trans-Tasman Resources Ltd	94	Support Retain Objective 2 of the Plan as notified.	Accept Objective 2 is retained subject to minor amendments as requested by other submitters.

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
12 – Chorus New Zealand Limited	95	Support	Accept
		Retain Objective 2 of the Plan as notified.	Objective 2 is retained subject to minor amendments as requested by other submitters.
13 – Spark New Zealand Trading Limited	96	Support	Accept
		Retain Objective 2 of the Plan as notified.	Objective 2 is retained subject to minor amendments as requested by other submitters.
14 – Vodafone New Zealand Limited	97	Support	Accept
		Retain Objective 2 of the Plan as notified.	Objective 2 is retained subject to minor amendments as requested by other submitters.
25 – New Zealand Petroleum and Minerals	98	Support	Accept
		Retain Objective 2 of the Plan as notified.	Objective 2 is retained subject to minor amendments as requested by other submitters.
26 – Transpower NZ Ltd	99	Amend	Accept
		Submitter seeks amendment of Objective 2 of the Plan to read: <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>	Officers recommend amending Objective 2 to grant this and other related reliefs sought by the submitter. The amended Objective would read as follows: <i>Natural and physical resources of the coastal environment are used efficiently, and activities, <u>including regionally important industry and infrastructure that have technical, operational and/or locational requirements</u>, that depend on the use and development of these resources, are provided for in appropriate locations.</i>
Further submissions – Powerco (45), Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd (46)		Support in part	
Further submissions – Fonterra (47)		Support	
27 – Taranaki Chamber of Commerce	100	Support	Accept
		Retain Objective 2 of the Plan as notified.	Objective 2 is retained subject to minor amendments as requested by other submitters.
32 – Port Taranaki	101	Amend	Accept

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		Submitter seeks amendment of Objective 2 of the Plan (or add new objective) to specifically address provision for ongoing development of strategically significant regional and national infrastructure, including Port Taranaki.	Officers recommend amending Objective 2 to grant this and other related reliefs sought by the submitter. The amended Objective would read as follows: <i>Natural and physical resources of the coastal environment are used efficiently, and activities, <u>including regionally important industry and infrastructure that have technical, operational and/or locational requirements</u>, that depend on the use and development of these resources, are provided for in appropriate locations.</i>
Further submissions – Powerco (45), Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd (46)		Support in part	
33 - New Zealand Defence Force	102	Support Retain Objective 2 of the Plan as notified.	Accept Objective 2 is retained subject to minor amendments as requested by other submitters.
43 – Royal Forest and Bird Protection Society	103	Amend Submitter seeks amendment to Objective 2 of the Plan to read: <i>Objective 2: <u>Appropriate Efficient</u> 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.</i>	Decline Officers note that relief sought by the submitter confines the focus of the objective to “efficient” use and development. As a result many activities that might otherwise have been considered appropriate would no longer be recognised and provided for if the efficiency criterion only is applied. In so doing this might mean that many activities that contribute to the social, economic and cultural well-being of people and communities could be unnecessarily restricted. Officers further suggest the proposed relief would derogate from the <i>New Zealand Coastal Policy Statement</i> – particularly Objective 6 [Use and development] and Policies 6 [Activities in the coastal environment] and 9 [Ports], which generally recognise and provide for activities in the coastal environment.
Further submissions – Trans-Tasman Resources Ltd (6), Transpower (26), Te Korowai o Ngāruahine Trust (41)		Oppose	
45 – Powerco	104	Support Retain Objective 2 of the Plan as notified.	Accept Support noted. Objective 2 is retained subject to minor amendments as requested by other submitters.
46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	105	Support Retain Objective 2 of the Plan as notified.	Accept Support noted. Objective 2 is retained subject to minor amendments as requested by other submitters.
47 – Fonterra	106	Amend Submitter seeks amendment of Objective 2 of the Plan to read: <i>Natural and physical resources of the coastal environment are used efficiently, and activities, <u>including regionally important industry and infrastructure</u>, that depend on</i>	Accept Officers recommend amending Objective 2 to grant this and other related reliefs sought. The amended Objective would read as follows:

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		<i>the use and development of these resources are provided for in appropriate locations.</i>	<i>Natural and physical resources of the coastal environment are used efficiently, and activities, <u>including regionally important industry and infrastructure that have technical, operational and/or locational requirements</u>, that depend on the use and development of these resources, are provided for in appropriate locations.</i>
Further submissions – Te Rūnanga o Ngāti Mutunga (40), Te Korowai o Ngāruahine Trust (41)		Oppose	
59 - KiwiRail	107	Support	Accept
		Retain Objective 2 of the Plan as notified.	Support noted. Objective 2 is retained subject to minor amendments as requested by other submitters.
Objective 3 – Reverse sensitivity			
2 – Federated Farmers	108	Support	Accept
		Retain Objective 3 of the Plan as notified.	Support noted. Objective 3 is retained subject to minor amendments as requested by other submitters.
12 – Chorus New Zealand Limited	109	Support	Accept
		Retain Objective 3 of the Plan as notified.	Support noted. Objective 3 is retained subject to minor amendments as requested by other submitters.
13 – Spark New Zealand Trading Limited	110	Support	Accept
		Retain Objective 3 of the Plan as notified.	Support noted. Objective 3 is retained subject to minor amendments as requested by other submitters.
14 – Vodafone New Zealand Limited	111	Support	Accept
		Retain Objective 3 of the Plan as notified.	Support noted. Objective 3 is retained subject to minor amendments as requested by other submitters.
20 – Meridian Energy Limited	112	Amend	Decline
		Submitter seeks amendment to Objective 3 of the Plan to read: <i>The use and ongoing operation 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>	Pursuant to Section 63 of the RMA, the purpose of regional plans is to assist a regional council to carry out its functions in order to achieve the purpose of the RMA. Officers therefore do not consider it appropriate to have objectives to manage activities such as subdivision, which clearly falls outside its statutory functions and where achievement of the objective (or otherwise) lies with other parties (i.e. territorial authorities) pursuant to other plans.

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
23 – New Plymouth District Council	113	Support	Accept
		Retain Objective 3 of the Plan as notified.	Support noted. Objective 3 is retained subject to minor amendments as requested by other submitters.
26 – Transpower NZ Ltd	114	Amend	Accept
		Submitter supports Objective 3 of the Plan but seeks amendment of the title to read: <i>Objective 3 Reverse-sensitivity <u>Impacts on established operations and activities</u></i> The submitter contends that the relief sought would help to clarify the intent of the objective and is a more user friendly variant providing more direction for Plan users.	Officers agree to the relief requested to amend the title to read: <u><i>Impacts on established operations and activities</i></u>
32 – Port Taranaki	115	Support	Accept
		Retain Objective 3 of the Plan as notified	Support noted. Objective 3 is retained subject to minor amendments as requested by other submitters.
33 - New Zealand Defence Force	116	Support	Accept
		Retain Objective 3 of the Plan as notified.	Support noted. Objective 3 is retained subject to minor amendments as requested by other submitters.
35 – Radio New Zealand Ltd	117	Support	Accept
		Retain Objective 3 of the Plan as notified.	Support noted. Objective 3 is retained subject to minor amendments as requested by other submitters.
43 – Royal Forest and Bird Protection Society	118	Amend	Decline
		The submitter believes that Objective 3 is in conflict with Policy 6(1)(e) of the <i>New Zealand Coastal Policy Statement</i> as it prioritises the protection of lawfully established activities over subsequent development, including new regionally significant infrastructure. Submitter seeks amendment of the Plan by deleting Objective 3: <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>	Officers do not believe it is necessary or appropriate to delete Objective 3 noting that provision for new operations and activities in the coastal environment are already addressed in Objective 2 of the Plan. Objective 3 is viewed as upholding Policy 6(1) of the <i>New Zealand Coastal Policy Statement</i> as it provides protection for nationally and regionally important infrastructure. The objective also supports Policy 10 of the <i>National Policy Statement for Electricity Transmission</i> and the <i>National Environmental Standard for Telecommunication Facilities</i> which require the management of activities to avoid

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Further submissions – Meridian Energy Ltd (20), Transpower NZ Ltd (26), New Zealand Defence Force (33), Radio New Zealand (35), Petroleum Exploration and Production Association of New Zealand (37)		Oppose	reverse sensitivity on the transmission and telecommunication networks. Officers further believe it is appropriate and equitable that the Objective address the management of adverse effects on other lawfully established activities. Officers note the wide level of support that has been indicated by other submitters for this Objective.
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Support	
45 – Powerco	119	Amend Submitter seeks amendment to Objective 3 of the Plan to read: <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 use and development in the coastal environment.</i>	Accept in kind Maintenance and upgrading are activities required for the ongoing operation of infrastructure, therefore, officers recommend granting the relief sought in kind by the submitter (and others). The slight amendment from the relief sought by the submitter is to adopt consistent terminology to that used elsewhere in the Plan and which will be defined. Officers recommend the Objective 3 be amended to read as follows: <i>The use and ongoing operation, <u>maintenance, alteration and extension</u> of nationally and regionally important infrastructure is protected from new or <u>incompatible</u> use and development <u>occurring under, over, or adjacent to the infrastructure or activity.</u></i>
Further submissions – Meridian Energy Ltd (20)		Support in part	
Further submissions – Transpower (26)		Support	
Further submissions – Taranaki Energy Watch (51)		Oppose	
46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	120	Amend Submitter seeks amendment to Objective 3 of the Plan to read: <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 use and development in the coastal environment.</i>	Accept Maintenance and upgrading are activities required for the ongoing operation of infrastructure, therefore, officers recommend granting the relief sought in kind by the submitter (and others). The slight amendment from the relief sought by the submitter is to adopt consistent terminology to that used elsewhere in the Plan and which will be defined. Officers recommend the Objective 3 be amended to read as follows:
Further submissions – Meridian Energy Ltd (20)		Support in part	

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Further submissions – Department of Conservation (29), Taranaki Energy Watch (51)		Oppose	<i>The use and ongoing operation, <u>maintenance, alteration and extension</u> of nationally and regionally important infrastructure is protected from new or <u>incompatible</u> use and development <u>occurring under, over, or adjacent to the infrastructure or activity.</u></i>
47 – Fonterra	121	Support	Accept
		Retain Objective 3 of the Plan as notified.	Support noted. Objective 3 is retained subject to minor amendments as requested by other submitters.
59 - KiwiRail	122	Support	Accept
		Retain Objective 3 of the Plan as notified.	Support noted. Objective 3 is retained subject to minor amendments as requested by other submitters.
Objective 4 – Life-supporting capacity and mauri			
43 – Royal Forest and Bird Protection Society	123	Support	Accept
		Retain Objective 4 of the Plan as notified.	Support noted. Objective 4 is retained.
46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	124	Support	Accept
		Retain Objective 4 of the Plan as notified.	Support noted. Objective 4 is retained.
Objective 5 – Coastal water quality			
29 – Department of Conservation	125	Amend	Accept in kind
		<p>To give effect to Policy 21 [Enhancement of water quality] of the <i>New Zealand Coastal Policy Statement</i>, the submitter seeks amendment to Objective 5 of the Plan to include provision for the restoration of water quality where appropriate.</p> <p>Submitter seeks amendment to Objective 5 of the Plan to read:</p> <p><i>Water quality in the coastal environment is maintained and enhanced <u>and where quality of water in the coastal environment has deteriorated, restore where practicable.</u></i></p>	<p>For the purposes of increased certainty and clarity, officers recommend granting the relief sought in kind by amending the Objective in line with relief sought by other submitters that reads as follows:</p> <p><i>Water quality in the coastal environment is maintained <u>where it is good,</u> and enhanced <u>where it is degraded.</u></i></p>
Further submissions – Trans-Tasman Resources Ltd (6)		Oppose	

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Further submissions – Te Rūnanga o Ngāti Mutunga (40), Te Korowai o Ngāruahine Trust (41), Te Atiawa (58), Te Rūnanga o Ngāti Ruanui Trust (61)		Support	
43 – Royal Forest and Bird Protection Society	126	<p>Amend</p> <p>Submitter supports Objective 5 of the Plan but seeks new Plan provisions to align with the <i>National Policy Statement for Freshwater Management</i>, including establishing numeric and descriptive water quality objectives/targets and setting standards for water bodies, and estuaries and sites at sea, in this Plan.</p>	<p>Decline</p> <p>While a number of small consequential amendments are proposed to Plan provisions that may give effect to better alignment with the <i>National Policy Statement for Freshwater Management</i>, Officers believe the establishment and setting of numeric and descriptive water quality objectives/targets and setting standards for water bodies, and estuaries and sites at sea in the Plan unnecessary.</p> <p>Of note, Taranaki generally has good quality coastal water. This is primarily due to the relatively small number of major point source discharges to the coastal marine area but is also attributable to the nature of our very small and few estuaries, and the very turbulent, wild and open Tasman Sea (as distinct from the Baltic Sea in northern Europe). The setting of robust, scientifically validated nutrient and other limits for Taranaki coastal waters would be technically difficult and costly to link and justify with the maintenance and enhancement of specific coastal values and can be more effectively imposed through the consenting process associated with point source discharges.</p>
46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	127	<p>Support</p> <p>Retain Objective 5 of the Plan as notified.</p>	<p>Accept</p> <p>Support noted. Objective 5 is retained subject to minor amendments as requested by other submitters.</p>
Further submissions – Port Taranaki Ltd (32)		Support	
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Oppose	
47 – Fonterra	128	<p>Amend</p> <p>The submitter does not consider it technically possible to both maintain and enhance water quality at the same time and seek amendments to direct the circumstances in which coastal water quality should be maintained or enhanced.</p>	<p>Accept</p> <p>For the purposes of increased certainty and clarity, officers recommend granting the relief sought and for the revised Objective to read as follows:</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		Submitter seeks amendment to Objective 5 of the Plan to read: <i>Water quality in the coastal environment is maintained <u>where it is good</u>, and enhanced <u>where it is degraded</u>.</i>	<i>Water quality in the coastal environment is maintained <u>where it is good</u>, and enhanced <u>where it is degraded</u>.</i>
Further submissions – Te Korowai o Ngāruahine Trust (41), Te Atiawa (58)		Support	
48 – Taranaki District Health Board	129	Support Retain Objective 5 of the Plan as notified.	Accept Support noted. Objective 5 is retained subject to minor amendments as requested by other submitters.
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Oppose	
61 – Te Rūnanga o Ngāti Ruanui Trust	130	Amend Submitter seeks amendment to Objective 5 of the Plan to read: <i>Objective 5: Coastal water quality Water quality <u>and mauri values</u> in the coastal environment is maintained and enhanced.</i>	Decline Officers do not recommend granting the relief sought. Officers note that mouri has already been addressed in Objective 4, which relates to the life supporting capacity of coastal water, land and air. This is considered a more appropriate fit for mouri than Objective 5, which relates only to water quality, Water quality is likely to be only one component of mouri and excludes considerations such as the ecological functioning and health of the environment overall.
Further submissions – Te Rūnanga o Ngāti Mutunga (40)		Support	
Objective 6 – Natural character			
20 – Meridian Energy Limited	131	Amend Submitter seeks amendment to Objective 6 of the Plan to read: <i>The natural character of the coastal environment is preserved and protected from inappropriate <u>subdivision</u>, use and development <u>and is restored where appropriate</u>.</i>	Decline The relief sought by the submitter has two parts. First it seeks to expand the scope of Objective 6 to address subdivision and, second, it seeks to delete reference to restoration of natural character. In relation to subdivision, pursuant to Section 63 of the RMA, the purpose of regional plans is to assist a regional council to carry out its functions in order to achieve the purpose of the RMA. Officers therefore do not consider it appropriate to have objectives to manage activities such as subdivision, which clearly falls outside its statutory functions and where achievement of the objective (or otherwise) lies with other parties (i.e. territorial authorities) pursuant to other plans. In relation to deleting reference to restoring the natural character of the coastal environment, officers note other submitter support for the Objective in its current

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
			form and believe that it supports and underpins Policy 10 [Restoration of natural character], which sets out the direction and guidance for giving effect to that part of the Objective.
23 – New Plymouth District Council	132	Support Retain Objective 6 of the Plan as notified.	Accept Support noted. Objective 6 is retained subject to minor amendments as requested by other submitters.
Further submissions – Meridian Energy Ltd (20)		Support in part	
Further submissions – Port Taranaki Ltd (32)		Support	
29 – Department of Conservation	133	Support Retain Objective 6 of the Plan as notified.	Accept Support noted. Objective 6 is retained subject to minor amendments as requested by other submitters.
26 – Transpower NZ Ltd	134	Support Retain Objective 6 of the Plan as notified.	Accept Support noted. Objective 6 is retained subject to minor amendments as requested by other submitters.
43 – Royal Forest and Bird Protection Society	135	Amend Submitter seeks amendment to Objective 6 of the Plan to read: <i>The natural character of the coastal environment is preserved and protected from inappropriate <u>subdivision</u>, use and development and is restored where appropriate degraded.</i>	Accept in part Pursuant to Section 63 of the RMA, the purpose of regional plans is to assist a regional council to carry out its functions in order to achieve the purpose of the RMA. Officers therefore do not consider it appropriate to have objectives to manage activities such as subdivision, which clearly falls outside its statutory functions and where achievement of the objective (or otherwise) lies with other parties (i.e. territorial authorities) pursuant to other plans. Notwithstanding the above, the submitter's request for word changes to restore the natural character of the coastal environment where degraded from inappropriate use and development does have merit and is supported.
Further submissions – Federated Farmers (2)		Oppose	
Further submissions – Meridian Energy Ltd (20)		Support in part	
Further submissions – Transpower NZ Ltd (26)		Oppose in part	
45 – Powerco	136	Support	Accept

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		Retain Objective 6 of the Plan as notified.	Support noted. Objective 6 is retained subject to minor amendments as requested by other submitters.
46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	137	Support	Accept
		Retain Objective 6 of the Plan as notified.	Support noted. Objective 6 is retained subject to minor amendments as requested by other submitters.
47 – Fonterra	138	Support	Accept
		Retain Objective 6 of the Plan as notified.	Support noted. Objective 6 is retained subject to minor amendments as requested by other submitters.
59 - KiwiRail	139	Support	Accept
		Retain Objective 6 of the Plan as notified.	Support noted. Objective 6 is retained subject to minor amendments as requested by other submitters.
Objective 7 – Natural features and landscapes			
20 – Meridian Energy Limited	140	Amend	Decline
		Submitter seeks amendment to Objective 7 of the Plan to read: <i>The natural features and landscapes of the coastal environment are protected from inappropriate <u>subdivision</u>, use and development.</i>	Pursuant to Section 63 of the RMA, the purpose of regional plans is to assist a regional council to carry out its functions in order to achieve the purpose of the RMA. Officers therefore do not consider it appropriate to have objectives to manage activities such as subdivision, which clearly falls outside its statutory functions and where achievement of the objective (or otherwise) lies with other parties (i.e. territorial authorities).
23 – New Plymouth District Council	141	Support	Accept
		Retain Objective 7 of the Plan as notified.	Support noted. Objective 7 is retained as notified.
26 – Transpower NZ Ltd	142	Support	Accept
		Retain Objective 7 of the Plan as notified.	Support noted. Objective 7 is retained as notified.
43 – Royal Forest and Bird Protection Society	143	Amend	Decline
		Submitter seeks amendment to Objective 7 of the Plan to read:	Pursuant to Section 63 of the RMA, the purpose of regional plans is to assist a regional council to carry out its functions in order to achieve the purpose of the RMA. Officers therefore do not consider it appropriate to have objectives to

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		<i>The natural features and landscapes of the coastal environment is preserved and protected from inappropriate subdivision, use and development and is restored where appropriate degraded.</i>	manage activities such as subdivision, which clearly falls outside its statutory functions and where achievement of the objective (or otherwise) lies with other parties (i.e. territorial authorities) pursuant to other plans. Notwithstanding the above, the submitter's request for word changes to restore the natural character of the coastal environment where degraded from inappropriate use and development does have merit and is supported.
45 – Powerco	144	Support Retain Objective 7 of the Plan as notified.	Accept Support noted. Objective 7 is retained as notified.
46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	145	Support Retain Objective 7 of the Plan as notified.	Accept Support noted. Objective 7 is retained as notified.
47 – Fonterra	146	Support Retain Objective 7 of the Plan as notified.	Accept Support noted. Objective 7 is retained as notified.
Objective 8 – Indigenous biodiversity			
23 – New Plymouth District Council	147	Support Retain Objective 8 of the Plan as notified.	Accept Support noted. Objective 7 is retained as notified.
Further submissions – Port Taranaki Ltd (32)		Support	
43 – Royal Forest and Bird Protection Society	148	Amend Submitter seeks amendment to Objective 8 of the Plan to read: <i>[...] protect indigenous biodiversity in the coastal environment.</i>	Decline Objective 8 has two aspects. The first part of the Objective relates to all indigenous biodiversity in the coastal environment being “maintained and enhanced”, while the second part of the Objective relates to the protection of some aspects of biodiversity, i.e. significant indigenous biodiversity. Officers do not believe it appropriate or necessary to ‘protect’ all aspects of indigenous biodiversity from the adverse effects of activities. The Section 5 purpose [Sustainable management] of the RMA involves use and development as well as protection. Not all aspects of indigenous biodiversity necessarily must be protected. ‘Protecting’ all indigenous biodiversity rather than “ <i>maintaining and enhancing</i> ” would be overly prescriptive. Of note the Objective already seeks to protect
Further submissions – Te Atiawa (58)		Support	

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
			"significant indigenous biodiversity", which is directly aligned with Policy 11 of the <i>New Zealand Coastal Policy Statement</i> .
45 – Powerco	149	Amend Submitter seeks that Objective 8 of the Plan (and corresponding policies and rules) provide appropriately for the operation, maintenance and upgrade of existing regionally important infrastructure.	No relief necessary No precise details of amendments sought to Objective 8 have been provided. However, officers note that Section 4 of the Plan provides a suite of objectives that together provide for a broad range of values and uses, including nationally and regionally important infrastructure. Objectives relating to regionally important infrastructure are separately addressed in Objectives 2 and 3 of the Plan. In determining the weighing or priority given to particular values the Plan policies also apply. Officers do not believe any amendments to Objective 8 are therefore necessary. Notwithstanding the above, in response to reliefs sought elsewhere by the submitter (and others), consequential amendments have been made in other Plan provisions that further recognise and provide for the operation, maintenance and upgrade of existing regionally important infrastructure.
Further submissions	150	26 – Transpower - Support	
46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	151	Amend Seek that Objective 8 (and corresponding policies and rules) provide appropriately for the operation, maintenance and upgrade of existing regionally important infrastructure.	No relief necessary No precise details of amendments sought to Objective 8 have been provided. However, officers note that Section 4 of the Plan provides a suite of objectives that together provide for a broad range of values and uses, including nationally and regionally important infrastructure. Objectives relating to regionally important infrastructure are separately addressed in Objectives 2 and 3 of the Plan. In determining the weighing or priority given to particular values the Plan policies also apply. Officers do not believe any amendments to Objective 8 are therefore necessary. Notwithstanding the above, in response to reliefs sought elsewhere by the submitter (and others), consequential amendments have been made in other Plan provisions that further recognise and provide for the operation, maintenance and alteration (upgrade) of existing regionally important infrastructure.
Further submissions – Federated Farmers (2)		Support	
Objective 9 – Relationship of tangata whenua with the coastal environment			
48 – Taranaki District Health Board	152	Support Retain Objective 9 of the Plan as notified.	Accept

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Further submissions – Port Taranaki Ltd (32)		Support	Support noted. Objective 9 is retained subject to minor amendments as requested by other submitters.
57 – Heritage New Zealand	153	<p>Amend</p> <p>The submitter requests that Objective 9 be amended to refer to all “Māori” in place of “tangata whenua” to follow similar wording within the RMA. The submitter suggests that iwi/hapū that no longer hold mana whenua can still have important relationships with an area, although they no longer have mana whenua, and such situations need to be provided for within this objective.</p> <p>Submitter seeks amendment to the title and content of Objective 9 of the Plan to read:</p> <p><i>Objective 9: Relationship of <u>Māori tangata whenua</u> with the coastal environment</i> <i>Traditional and continuing relationships of <u>Māori tangata whenua</u> and their cultures and traditions with the coastal environment <u>and their ancestral lands, water, sites, waahi tapu and other taonga</u>, including the role of tangata whenua as kaitiaki, are recognised and provided for and protected from inappropriate use and development of the coastal marine area.</i></p>	<p>Accept in part</p> <p>Officers note that iwi, hapū and whanau themselves have not commented on this submission point nor sought any similar changes. Nor has relief of this type been sought from the wider Māori community or others. Tangata whenua is considered more appropriate in the Taranaki context whereby the Council seeks to explicitly recognise tangata whenua relationships with the coast in the Plan objectives and policies. Unless iwi authorities themselves seek a change, officers recommend retaining reference to tangata whenua (rather than Māori) in the Objective but amending the Objective to grant relief to other amendments sought by the submitter. The revised Objective to read as follows:</p> <p><i>Traditional and continuing relationships of tangata whenua and their cultures and traditions <u>with their ancestral lands, water, sites, waahi tapu and other taonga</u> in the coastal environment, including the role of tangata whenua as kaitiaki, are recognised and provided for.</i></p>
Objective 10 – Treaty of Waitangi			
41 – Te Korowai o Ngāruahine Trust	154	<p>Amend</p> <p>The submitter supports the introduction of Te Tiriti o Waitangi because, through the Plan, it embeds the Treaty into the heart of decision making considerations.</p> <p>Submitter seeks amendment to Objective 10 of the Plan to:</p> <ul style="list-style-type: none"> • read “<u>...Give effect to The principles of the Treaty of Waitangi including the principles of ... in the management of the coastal environment</u>” • reference the following guiding principles: mai te maunga, Taranaki kite e tai a Kupe, whakapapa, kaitiakitanga, manaakitanga, whanaungatanga, kawanatanga, and rangatiratanga. 	<p>Accept in part</p> <p>Officers note the support from the submitter for the introduction of the Treaty of Waitangi into the objectives section of the Plan. However, officers do not recommend amending the Objective to “give effect” to the Treaty of Waitangi as the current wording of the Objective is already consistent with Objective 3 and Policy 2 of the <i>New Zealand Coastal Policy Statement</i>, which requires persons exercising functions and powers under the RMA to “take into account”, rather than “give effect to”, the principles of the Treaty of Waitangi.</p> <p>In addition, the submitter wishes to reinstate (from the draft Plan) five values that encapsulate the relationship between iwi o Taranaki and the coastal environment. Officers recommend granting this part of the relief sought and amending the Objective to refer to the guiding principles as it improves the integration of Māori principles throughout the Plan. The amended Objective 10 to read as follows:</p> <p><i>The principles of the Treaty of Waitangi, including the principles of <u>mai te maunga Taranaki kite e tai a Kupe, whakapapa, kaitiakitanga, manaakitanga, whanaungatanga, kawanatanga, and rangatiratanga</u> kawanatanga, rangatiratanga,</i></p>
Further submissions – Trans-Tasman Resources Ltd (6)		Oppose	

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
			partnership, active participation, resource development and spiritual recognition , are taken into account in the management of the coastal environment.
48 – Taranaki District Health Board	155	Support Retain Objective 10 of the Plan as notified.	Accept Support noted. Objective 10 is retained subject to minor amendments as requested by other submitters.
Further submissions – Port Taranaki Ltd (32)		Support	
58 – Te Atiawa	156	Amend Submitter seeks amendment to Objective 10 of the Plan to read: <i>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.</i>	Decline Officers do not recommend amending the Objective to “give effect” to the Treaty of Waitangi as the current wording of the Objective is already consistent with Objective 3 and Policy 2 of the <i>New Zealand Coastal Policy Statement</i> , which requires persons exercising functions and powers under the RMA to “take into account”, rather than “give effect to”, the principles of the Treaty of Waitangi.
Further submissions – Trans-Tasman Resources Ltd (6)		Oppose	
Objective 11 – Historic heritage			
20 – Meridian Energy Limited	157	Amend Submitter seeks amendment to Objective 11 of the Plan to read: <i>Historic heritage in the coastal environment is protected from inappropriate subdivision, use and development.</i>	Decline Pursuant to Section 63 of the RMA, the purpose of regional plans is to assist a regional council to carry out its functions in order to achieve the purpose of the RMA. Officers therefore do not consider it appropriate to have objectives to manage activities such as subdivision, which clearly falls outside its statutory functions and where achievement of the objective (or otherwise) lies with other parties (i.e. territorial authorities) pursuant to other plans.
43 – Royal Forest and Bird Protection Society	158	Support Retain Objective 11 of the Plan as notified.	Accept Support noted. Objective 11 is retained as notified.
Further submissions – Port Taranaki Ltd (32)		Support	
	159	Amend	Accept in kind

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
57 – Heritage New Zealand		Submitter seeks amendment to Objective 11 of the Plan to read: <i>Significant hHistoric heritage in the coastal environment is protected from inappropriate use and development of the coastal marine area, and the extensive but limited knowledge of historic heritage in the coastal environment is recognised.</i>	Officers note that the Plan already gives partial relief to the submitter in that Objective 11 refers to historic heritage generally rather than “significant historic heritage.” The submitter seeks further amendments to Objective 11 – similar in kind to Objective 6 of the <i>New Zealand Coastal Policy Statement</i> – to recognise the extensive but limited knowledge of historic heritage in the coastal environment. Officers note that the issue of extensive but limited knowledge of historic heritage in the coastal environment has already been highlighted in the Section 32 Evaluation Report and officers do not believe it is necessary to restate such matters in Plan objectives. Officers are also unclear as to how ‘recognition’ in a Plan objective would be monitored meaningfully. Accordingly, changes are not recommended to the Objective itself. Officers recommend an alternative relief involving consequential amendments in the background information of the Plan [Natural and historic heritage] and Policy 5 [Use and development] of the Plan to further highlight this issue.
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Support	
61 – Te Rūnanga o Ngāti Ruanui Trust	160	Amend Submitter seeks amendment to Objective 11 of the Plan to read: <i>Objective 11: Cultural and Historic Heritage</i> <i>Cultural and Historic heritage in the coastal environment is protected from inappropriate use and development.</i>	Decline Submitter seeks additional wording for matters already provided for in the RMA definition of “historic heritage”, i.e. that references to “historic heritage” be read as “cultural and historic heritage”. The risk of adding extra wording to Objective 11 is that the term “cultural” may unintentionally introduced new elements not meant to be provided for in the term “historic heritage” thereby reducing certainty and clarity when applying Plan provisions. Of note, broader cultural considerations are separately addressed in Objectives 9 [Relationship of tangata whenua] and 10 [Treaty of Waitangi] of the Plan.
Further submissions – Te Korowai o Ngāruahine Trust (41)		Support	
Objective 12 – Public use and enjoyment			
2 – Federated Farmers	161	Amend Submitter seeks amendment to Objective 12 of the Plan to read: <i>People’s use and enjoyment of the coastal environment, including amenity values, traditional practices and public access to and within the coastal environment marine area, is maintained and enhanced.</i>	Decline Objective 12 applies to the coastal environment to promote integrated management of the coast across environmental domains and across local authority jurisdictional boundaries in a manner consistent with Policy 4 of the <i>New Zealand Coastal Policy Statement</i> . Confining Objective 12 to only the coastal marine area would derogate from that intent.
	162	Amend	Accept

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
29 – Department of Conservation		Submitter seeks amendment to Objective 12 of the Plan to read: <i>The public's 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>	The submitter suggests that to improve alignment and consistency between Policy 18 [Public open spaces] of the <i>New Zealand Coastal Policy Statement</i> and Policy 17 of the Plan, the use of the term "public" should be used. It is noted that the word "people" can include private use. Officers agree with the relief sought.
40 – Te Rūnanga o Ngāti Mutunga	163	Amend Submitter seeks amendment to Objective 12 of the Plan to read: <i>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 <u>without adversely impacting on cultural and environmental values.</u></i>	Accept in kind The submitter's concerns are that people's use and development of the coastal environment should be subject to the appropriate management of adverse effects on cultural and environmental values. Officers recommend granting the relief sought in kind by amending Objective 12 to recognise that people's use and enjoyment of the coast should not be to the detriment of other uses and values. However, officers do not believe it appropriate to specify or confine the Objective to the consideration of specific values. First, the suggested amendments by the submitter introduce a strict avoidance threshold with no regard to the significance of the effects. Second, the suggested amendments do not recognise other circumstances, where coastal public access should be subject to avoiding, remedying or mitigating adverse impacts on other uses and values (e.g. public health and safety). These are outlined later in Policy 17. Officers recommend that Objective 12 be amended to read: <i>The public's use and enjoyment of the coastal environment, including amenity values, traditional practices and public access to and within the coastal environment, is maintained <u>or</u> enhanced <u>where appropriate.</u></i>
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Support	
41 – Te Korowai o Ngāruahine Trust	164	Amend Submitter seeks amendment to Objective 12 of the Plan to read: <i>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 <u>without adversely impacting on cultural and environmental values.</u></i>	Accept in kind The submitter's concerns are that people's use and development of the coastal environment should be subject to the appropriate management of adverse effects on cultural and environmental values. Officers recommend granting the relief sought in kind by amending Objective 12 to recognise that people's use and enjoyment of the coast should not be to the detriment of other uses and values. However, officers do not believe it appropriate to specify or confine the Objective to the consideration of specific values. First, the suggested amendments by the submitter introduce a strict avoidance threshold with no regard to the significance of the effects. Second, the suggested amendments do not recognise other circumstances, where coastal public access
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Support	

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
			<p>should be subject to avoiding, remedying or mitigating adverse impacts on other uses and values (e.g. public health and safety). These are outlined later in Policy 17.</p> <p>Officers recommend that Objective 12 be amended to read:</p> <p><i>The public's use and enjoyment of the coastal environment, including amenity values, traditional practices and public access to and within the coastal environment, is maintained or enhanced where appropriate.</i></p>
43 – Royal Forest and Bird Protection Society	165	<p>Amend</p> <p>Submitter seeks amendment to Objective 12 of the Plan 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 <i>New Zealand Coastal Policy Statement</i>.</p>	<p>No relief necessary</p> <p>No precise details of amendments sought to Objective 12 have been provided and the amendments sought by the submitter are considered unnecessary.</p> <p>Officers note the Plan comprises of a suite of objectives, policies and methods, including rules that collectively give effect to the <i>New Zealand Coastal Policy Statement</i>. Plan provisions need to be read together (while also acknowledging the different statutory responsibilities and powers of territorial authorities and district plans for giving effect to specific elements of the <i>New Zealand Coastal Policy Statement</i>).</p> <p>Officers refer the submitter to Policies 17 [Public access], 18 [Amenity values], 19 [Surf breaks], of the Plan, and Implementation Methods 32 to 36 and 39, which specifically address Policy 16(a), Policy 18(a), (b), (d) and (e), Policy 19(1), (3) and (4), and Policy 20 of the <i>New Zealand Coastal Policy Statement</i>. Other Plan provisions also apply.</p>
Further submissions – Port Taranaki Ltd (32)		Oppose	
47 – Fonterra	166	<p>Amend</p> <p>Submitter seeks amendment to Objective 12 of the Plan to read:</p> <p><i>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 or enhanced where appropriate.</i></p>	<p>Accept</p> <p>The submitter comments that there may be occasions where it is necessary to limit public access, even if only temporarily. A further amendment is proposed as the submitter does not consider it possible to maintain and enhance public access at the same time.</p> <p>Officers agree that Objective 12 should be amended to recognise that people's use and enjoyment of the coast should not be to the detriment of other uses and values. Accordingly, officers recommend that Objective 12 be amended to read:</p> <p><i>The public's use and enjoyment of the coastal environment, including amenity values, traditional practices and public access to and within the coastal environment, is maintained or enhanced where appropriate.</i></p>
Further submissions – Te Korowai o Ngāruahine Trust (41), Te Atiawa (58)		Oppose	
	167	Support	Accept

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
48 – Taranaki District Health Board		Retain Objective 12 of the Plan as notified.	Support noted. Objective 12 is retained subject to minor amendments as requested by other submitters.
58 – Te Atiawa	168	<p>Amend</p> <p>Submitter seeks amendment to Objective 12 of the Plan to read: <i>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 <u>without adversely impacting on cultural and environmental values.</u></i></p>	<p>Accept in kind</p> <p>The submitter's concerns are that people's use and development of the coastal environment should be subject to the appropriate management of adverse effects on cultural and environmental values.</p> <p>Officers recommend granting the relief sought in kind by amending Objective 12 to recognise that people's use and enjoyment of the coast should not be to the detriment of other uses and values. However, Officers do not believe it appropriate to specify or confine the Objective to the consideration of specific values. First, the suggested amendments by the submitter introduce a strict avoidance threshold with no regard to the significance of the effects. Second, the suggested amendments do not recognise other circumstances, where coastal public access should be subject to avoiding, remedying or mitigating adverse impacts on other uses and values (e.g. public health and safety). These are outlined later in Policy 17.</p> <p>Officers recommend that Objective 12 be amended to read: <i>The public's use and enjoyment of the coastal environment, including amenity values, traditional practices and public access to and within the coastal environment, is maintained <u>or</u> enhanced <u>where appropriate.</u></i></p>
59 – KiwiRail	169	<p>Amend</p> <p>Submitter seeks amendment to Objective 12 of the Plan to read: <i>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 <u>where appropriate.</u></i></p>	<p>Accept</p> <p>Officers recommend that Objective 12 be amended to read: <i>The public'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<u>or</u> enhanced <u>where appropriate.</u></i></p>
Further submissions – Te Atiawa (58)		Oppose	
Objective 13 – Coastal hazards risk and public health and safety			
2 – Federated Farmers	170	<p>Support</p> <p>Retain Objective 13 of the Plan as notified.</p>	<p>Accept</p> <p>Support noted. Objective 13 is retained subject to minor amendments as requested by other submitters.</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
20 – Meridian Energy Limited	171	<p>Amend</p> <p>Submitter seeks amendment to Objective 13 of the Plan to read: <i>The risk of social, cultural, environmental, and economic harm from coastal hazards is not increased and public health, safety and property is not compromised by <u>subdivision</u>, use and development of the coastal <u>environment marine area</u>.</i></p>	<p>Accept in part</p> <p>The relief sought by the submitter has two parts. First, it seeks to expand the scope of the Objective to address subdivision and, second, it seeks to expand its scope so that it applies to the coastal environment (rather than just the CMA).</p> <p>In relation to subdivision, pursuant to Section 63 of the RMA, the purpose of regional plans is to assist a regional council to carry out its functions in order to achieve the purpose of the RMA. Officers therefore do not consider it appropriate to have objectives to manage activities such as subdivision, which clearly falls outside its statutory functions and where achievement of the objective (or otherwise) lies with other parties (i.e. territorial authorities) pursuant to other plans.</p> <p>In relation to expanding the scope of Objective 13 so that it applies to the coastal environment (rather than just the CMA), Officers agree. This is consistent with the scope of other Plan objectives.</p> <p>Officers recommend amending Objective 13 (in line with reliefs sought by other submitters) to read as follows: <i>The risk of social, cultural, environmental, and economic harm <u>in the coastal environment</u> from coastal hazards is not increased <u>beyond acceptable levels</u> and public health, safety and property is not compromised by use and development of the coastal marine area.</i></p>
43 – Royal Forest and Bird Protection Society	172	<p>Amend</p> <p>Submitter seeks amendment to Objective 13 of the Plan to address the wider coastal environment and to reflect the matters set out in Policy 24, Policy 25, Policy 26, and Policy 27 of the <i>New Zealand Coastal Policy Statement</i>.</p>	<p>Accept in part</p> <p>No precise details of amendments sought to Objective 13 have been provided.</p> <p>Officers recommend minor amendment to make clear that Objective 13 applies to the wider coastal environment and that only the second part of the objective that relates to use and development is specific to the coastal marine area.</p> <p>However, as previously noted in submission point 165, officers do not believe it necessary or appropriate to make further amendments to reflect the <i>New Zealand Coastal Policy Statement</i>.</p> <p>Officers note the Plan comprises of a suite of objectives, policies and methods, including rules that collectively give effect to the <i>New Zealand Coastal Policy Statement</i>. Plan provisions need to be read together (while also acknowledging the different statutory responsibilities and powers of territorial authorities and district plans for giving effect to specific elements of the <i>New Zealand Coastal Policy Statement</i>).</p>
Further submissions – Port Taranaki Ltd (32)		<p>Oppose</p>	

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
			<p>Officers refer the submitter to Policies 20 [Coastal hazards], 21 [Natural hazard defences and Implementation Methods 37 to 42, which specifically address matters set out in Policy 24, Policy 25, Policy 26, and Policy 27 of the <i>New Zealand Coastal Policy Statement</i>. Other Plan provisions may also apply.</p> <p>Officers recommend amending Objective 13 (in line with reliefs sought by other submitters) to read as follows:</p> <p><i>The risk of social, cultural, environmental, and economic harm in the coastal environment from coastal hazards is not increased beyond acceptable levels and public health, safety and property is not compromised by use and development of the coastal marine area.</i></p>
46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	173	<p>Amend</p> <p>Submitter seeks amendment to Objective 13 of the Plan to read:</p> <p><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></p>	<p>Accept</p> <p>Officers agree to the sought amendment as it allows minor or risks deemed acceptable while continuing to protecting the region from coastal hazards. The revised Objective 13 will read as follows:</p> <p><i>The risk of social, cultural, environmental, and economic harm in the coastal environment from coastal hazards is not increased beyond acceptable levels and public health, safety and property is not compromised by use and development of the coastal marine area.</i></p>
Further submissions – Transpower (26), Petroleum Exploration and Production Association of New Zealand (37)		Support	
Further submissions – Department of Conservation (29), Te Rūnanga o Ngāti Ruanui Trust (61)		Oppose	
48 – Taranaki District Health Board	174	<p>Support</p> <p>Retain Objective 13 of the Plan as notified</p>	<p>Accept</p> <p>Support noted. Objective 13 is retained subject to minor amendments as requested by other submitters.</p>
Objectives 1 – 14			
41 – Te Korowai o Ngāruahine Trust	175	<p>Amend</p> <p>Submitter seeks amendment to Objectives section of the Plan to include commentary from the Section 32 Evaluation Report to explain the focus and intent of Plan objectives.</p>	<p>Decline</p> <p>The Council has deliberately chosen to make its Plan concise and focus its content matters on the mandatory content matters set out in Section 67 of the RMA to guide the setting of rules and consenting processes. As such, it contains very little</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
			<p>or minimal optional content such as issues, explanations, and methods (other than rules).</p> <p>Notwithstanding that, officers appreciate the submitter's comments on the usefulness of the explanation of Plan provisions provided in the Section 32 Explanation Report and recommend that Council finalise that report with the intention that it be a companion document to the Plan to assist readers in the interpretation and application of Plan provisions.</p>

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3.3 Policies

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Section 5 – Preamble			
43 – Royal Forest and Bird Protection Society	176	Support	Decline
		<p>Submitter seeks amendment to the introduction of Section 5 of the Plan, on page 19, to read:</p> <p>Section 5.1 contains [...] which relate to:</p> <p>1. [...]</p> <p><i>1A. protection of significant and outstanding values and characteristics of the coastal environment [...]</i></p>	<p>Officers note that the bullet points relate to the third order headings adopted for the Policies section of the Plan for the reader's ease of reference. The headings bundle similar policies by shared themes. Policies relating to the protection of significant and outstanding values and characteristics of the coastal environment are already addressed under the heading of "Natural form and functioning".</p>
43 – Royal Forest and Bird Protection Society	177	Amend	Accept in part
		<p>Submitter seeks amendment to the introduction of Section 5.1 of the Plan, on page 20, to read:</p> <p><i>This section provides the overall direction for achieving integrated management for the protection of significant and outstanding values and matters in the coastal environment (i.e. both the coastal marine area and areas landward where coastal processes, influences or qualities are significant) in order to achieve the objectives of this Plan.</i></p> <p><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>Officers agree to amend the introduction of Section 5.1 but note that the Plan policies cover use, development and protection of all coastal values not just "the protection of significant and outstanding values." Officers recommend an alternative relief and additional relief requested in other submission points that reads as follows:</p> <p><i>This section provides the overall direction for achieving integrated management of significant values and matters in the coastal environment (i.e. both the coastal marine area and areas landward where coastal processes, influences or qualities are significant and as indicatively shown on the planning maps) in order to achieve the objectives of this Plan.</i></p> <p><i>The policies apply to all activities in the coastal marine area but include consideration of uses values and relationships across the wider coastal environment. The Policies set out a coastal management framework, providing for use and development, protect, maintain and enhance significant and outstanding values, and manage coastal hazards and risks to public health and safety, 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>
Further submissions – Powerco (45), Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd (46)		Support in part	
	178	Amend	Accept

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
43 – Royal Forest and Bird Protection Society		Submitter seeks amendment to the introduction of Section 5.1 of the Plan, on page 20, to clarify the extent of the coastal management areas set out in the planning maps.	Both South Taranaki and New Plymouth district councils have commenced or are about to commence their respective district plan reviews, which includes a coastal protection zone. For the purposes of integrated management and to promote alignment between the respective regional and district plans, officers recommend that the Plan (and associated GIS layers and planning maps) be amended to include an indicative extent of the coastal environment that is aligned with the district plans. Consequential amendments throughout the Plan, including Section 5.1, are further recommended to ensure appropriate linkages between Plan provisions, the schedules and the planning maps.
Further submissions – Department of Conservation (29)		Support	
43 – Royal Forest and Bird Protection Society	179	Amend Submitter seeks amendment to the introduction of Section 5.1 of the Plan, on page 20, to clarify that the extent of the coastal management areas lists Policy 1(a), (b), (c) and (e) areas and that the Open Coast is not identified.	Decline Officers note that the Open Coast is identified in the Plan and it is not unreasonable to expect Plan readers to understand that the Open Coast coastal management area pertains to that part of the coastal marine area not already identified as being Outstanding, Estuary Unmodified, Estuary Modified and the Port. Of note, this Policy is a continuation of an existing policy in the current Coastal Plan and for which there have been no issues previously identified by Plan users in relation to its interpretation and application. Notwithstanding the above, consequential amendments are recommended to Policy 1 to clarify that coastal management areas relate to the coastal marine area only.
57 – Heritage New Zealand	180	Amend Submitter seeks amendment to the introduction of Section 5 of the Plan, on page 19, to include an additional bullet point and read: <i>Section 5.1 contains [...] which relate to:</i> <i>Relationship of Māori and their culture and traditions with the coastal environment.</i>	Accept Officers note that the bullet points relate to the third order headings adopted for the Policies section of the Plan for the reader's ease of reference. The headings bundle similar policies by shared themes. Policies relating to the relationship of Māori and their culture and traditions with the coastal environment are currently addressed under the heading of "Natural and historic heritage and values". However, recognition and provision for the relationship of tangata whenua contains cultural elements specific to Māori and additional to those covered by the natural heritage, the environment, and historic heritage policies. Officers recommend granting the relief and identifying the relationship of Māori and their culture and traditions with the coastal environment as a separate standalone heading.
Further submissions – Te Korowai o Ngāruahine Trust (41), Te Atiawa (58), Te Rūnanga o Ngāti Ruanui Trust (61)		Support	
	181	Other	No relief necessary

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
61 – Te Rūnanga o Ngāti Ruanui Trust		Submitter notes that Plan policies do not cover the Exclusive Economic Zone and, for the purposes of integrated management, seeks that the Council 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.	Comments noted.
Further submissions – Trans-Tasman Resources Ltd (6)		Neutral	
Further submissions – Te Atiawa (58)		Support	
Policy 1 – Coastal management areas			
5 – Point Board Riders	182	Support	Accept
		Submitter supports the inclusion of Policy 1(d)(iii) of the Plan. Retain as notified.	Support noted. Policy 1(d)(iii) is retained as notified.
6 – Trans-Tasman Resources Ltd	183	Support	Accept
		Submitter supports Policy 1(d)(i) of the Plan acknowledging the existing high energy wave environment and current coastal erosion in the open coast.	Support noted. Policy 1(d)(i) is retained as notified.
15 – Surfbreak Protection Society	184	Support	Accept
		Submitter supports the inclusion of Policy 1 (d)(iii) of the Plan. Retain as notified.	Support noted. Policy 1(d)(iii) is retained as notified.
20 – Meridian Energy Limited	185	Amend	Accept
		Submitter seeks amendment to the first paragraph of Policy 1 of the Plan to read: <i>Manage the coastal marine-area environment 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 [...]</i>	Policy 1 has two parts. The first part, to which the relief applies, recognises that some areas have different values, characteristics, uses, vulnerabilities, sensitivities or management needs to other areas. Officers recommend granting the relief sought by the submitter as the concept of some areas have different values, characteristics, uses, vulnerabilities, sensitivities or management needs to other areas applies to the wider coastal environment and not just the coastal marine area. However, the second part of the Policy clearly relates to identifying the five coastal management areas to which rules will specifically apply. Officers note that consequential amendments to Policy 1 are also recommended to clearly limit the coastal management areas to the coastal marine area. The proposed amendments would read as follows:

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
			<p>Manage the coastal <i>marine-area environment</i> in a way that recognises that some areas have values, characteristics or uses that are more vulnerable or sensitive to the effects of some activities, or that have different management needs than other areas.</p> <p>In managing the use, development and protection of resources <i>in the coastal marine area</i> under the Plan, recognition will be given to the following coastal management areas (identified in Schedule 1) and their distinguishing values, characteristics and uses: [...]</p>
23 – New Plymouth District Council	186	Support	Accept
		Retain Policy 1 of the Plan as notified.	Policy 1 is retained subject to minor amendments as requested by other submitters.
26 – Transpower NZ Ltd	187	Support	Accept
		Retain Policy 1 of the Plan as notified.	Policy 1 is retained subject to minor amendments as requested by other submitters.
28 – Grant Knuckey	188	Amend	Decline
		Submitter seeks amendment to Policy 1 of the Plan by incorporating mana whenua values from Policy 16 [Relationship of tangata whenua] into Policy 1.	Officers note the introductory sentence to Section 5 on page 19 that “... when assessing an activity, all relevant general and activity-based policies are to be considered and no individual policy viewed in isolation. ” It is therefore unnecessary to cross reference Policy 16 (and other policies) in Policy 1 for it to be considered. Both Policy 1 and 16 will be considered together (plus the other General Policies and relevant Activity Policies) in the assessment of any resource consent applications.
28 – Grant Knuckey	189	Amend	Decline
		Submitter seeks amendment to Policy 1 of the Plan by identifying two new marine spatial coastal management areas – wahi tapu areas and wahi taonga areas.	Officers recommend declining the relief sought in that the relief is unnecessary and has already been given effect to in a different manner. Policy 1 sets out a zonal approach for the application of rules in the coastal marine area. The coastal marine area has been divided into five coastal management areas based upon shared values, characteristics, uses, vulnerability or sensitivity, and different management needs. The zones allow rules to ‘bundle’ compatible activities or effects of these activities together and restrict activities or effects which are incompatible. The coastal management areas enables some activities, and restricts other activities.
Further submissions – Trans-Tasman Resources Ltd (6)		Oppose	
Further submissions –Te Rūnanga o Ngāti Ruanui Trust (61)		Support	

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
			<p>Officers note that Policy 1 is based upon the current coastal management regime, which included similar coastal management areas and has largely been effective in managing adverse effects in the coastal marine area.</p> <p>Notwithstanding the above, across all the coastal management areas and at a finer spatial scale, there will be specific sites and places with regionally significant values located within the coastal management area. They include sites, places and attributes identified as significant for their natural character, indigenous biodiversity, historic heritage and amenity values. Through this Coastal Plan review considerable effort has been made to identify and/or map sites of significance to tangata whenua in Schedule 5B of the Plan and associated planning maps. These sites include wahi tapu areas and wahi taonga areas to ensure that any adverse effects on these sites and places are properly considered and adverse effects avoided, remedied or mitigated. Officers note that supporting policies and rules in the Plan apply relating to the protection of wahi tapu, wahi taonga and other significant sites of significance to Māori.</p>
29 – Department of Conservation	190	<p>Amend</p> <p>Submitter seeks amendment to Policy 1(d) [Open Coast] of the Plan to include a new characteristic to read: <i>v) provide important habitats for marine species.</i></p>	<p>Accept in kind</p> <p>The submitter refers to the Section 32 Evaluation Report which recognizes that within the open coast there is a range of marine habitats that none of the other management areas have.</p> <p>Officers recommend granting the relief in kind by amending the scope of Policy 1(d)(ii) to refer to marine systems, which encompasses, amongst other things, reef systems that provide habitats for marine life.</p>
Further submissions – Trans-Tasman Resources Ltd (6)		Oppose	
Further submissions – Te Korowai o Ngāruahine Trust (41), Te Rūnanga o Ngāti Ruanui Trust (61)		Support	
32 – Port Taranaki	191	<p>Amend</p> <p>Submitter generally supports Policy 1 but questions the relevance or significance of Clause (e)(v) and recommends deleting it: <i>(v) can have significant effects on areas outside of the Port, including contributing to coastal erosion along the New Plymouth foreshore</i></p>	<p>Accept</p> <p>Officers agree that activities able to have significant effects outside the area of operation and able to have an impact on coastal erosion are not confined to the Port and recommend deleting the clause.</p>
Further submissions – Te Rūnanga o Ngāti Mutunga (40), Te Atiawa (58)		Oppose	

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
40 – Te Rūnanga o Ngāti Mutunga	192	<p>Amend</p> <p>Submitter seeks amendment to Policy 1(b) and (c) of the Plan to re-instate (from the Draft Coastal Plan) the following characteristics for Estuaries Unmodified and Estuaries Modified:</p> <p><i>[...] valued by Māori for Mahinga Kai.</i></p>	<p>Accept</p> <p>Officers agree to amend Policy 1(b) and (c) as through the exercise of mapping sites of significance to Māori, inevitably estuaries have been identified as important for a variety of reasons including mahinga kai. Officers recommend granting the relief, alongside other potential cultural, spiritual, historical and traditional associations:</p> <p><i>[...] are valued by Māori for taonga species, and cultural, spiritual, historical and traditional associations.</i></p>
Further submissions – Te Korowai o Ngāruahine Trust (41), Te Rūnanga o Ngāti Ruanui Trust (61)		– Support	
41 – Te Korowai o Ngāruahine Trust	193	<p>Amend</p> <p>Submitter seeks amendment of Policy 1 of the Plan 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.</p>	<p>No relief is necessary</p> <p>No precise details of amendments sought to Policy 1 have been provided but officers believe that Plan provisions, when read as a whole, give effect to the relief sought by the submitter and no further change is necessary.</p> <p>Policy 1 already includes an element of marine spatial planning. It sets out a zonal approach for the application of rules in the coastal marine area. The coastal marine area has been divided into five coastal management areas based upon shared values, characteristics, uses, vulnerability or sensitivity, and different management needs. The zones allow rules to 'bundle' compatible activities or effects of these activities together and restrict activities or effects which are incompatible. The coastal management areas enables some activities, and restricts other activities.</p> <p>Notwithstanding the above, across all the coastal management areas and at a finer spatial scale, there will be specific sites and places with regionally significant values. Through this Coastal Plan review considerable effort has been made to identify and/or map these values in the Plan schedules and associated planning maps, which include wahi tapu areas and wahi taonga areas to ensure that any adverse effects on these sites and places are properly considered and adverse effects avoided, remedied or mitigated.</p>
Further submissions – Te Korowai o Ngāruahine Trust (41), Te Atiawa (58), Te Rūnanga o Ngāti Ruanui Trust (61)		Support	
43 – Royal Forest and Bird Protection Society	194	<p>Other</p> <p>Submitter seeks 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>	<p>No relief necessary</p> <p>Comments noted.</p> <p>Officers note that the matters listed are but a general description of distinguishing values, characteristics and uses that underpin the identification of the five coastal management areas. Other values will inevitably apply but do not need to be identified</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Further submissions – Port Taranaki Ltd (32)		Support in part	and would be addressed in other supporting policies. Officers will discuss the matter further with the submitter as part of the pre-hearing engagement process.
43 – Royal Forest and Bird Protection Society	195	<p>Other</p> <p>Submitter questions whether the current wording of Policy 1 of the Plan, 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>	<p>No relief necessary</p> <p>No relief is sought. However, as previously noted, Policy 1 is a general description of distinguishing values, characteristics and uses that underpin the identification of the five coastal management areas.</p> <p>In relation to the “protective provisions” officers refer the submitter to the rest of the Plan. Officers note the introductory sentence to Section 5 on page 19 that “...when assessing an activity, regard will be had to all relevant general and activity-based policies are to be considered and no individual policy viewed in isolation.”</p> <p>Officers believe the ‘suite’ of General Policies plus relevant Activity Policies triggered by use and development activities in the coastal marine area address, amongst other things, the use and development and protection of natural and physical coastal resources.</p>
Further submissions – Port Taranaki Ltd (32)		Support in part	
43 – Royal Forest and Bird Protection Society	196	<p>Amend</p> <p>Submitter seeks amendment to the Plan by deleting Policy 1 of the Plan OR Amend Policy 1 by:</p> <ul style="list-style-type: none"> • setting 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 coastal marine area and applies only to the activities which are controlled under rules in the plan • 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 • including a statement that explains that Policy 1 does not provide direction for subdivision, use or development activities within the management areas. 	<p>Accept in part</p> <p>Officers recommend amendments to Policy 1 that gives partial effect to the relief sought by the submitter but which also addresses issues/matters raised by other submitters.</p> <p>The submitter’s concerns with the coastal management area approach are noted. However, officers note that the approach has been in place since 1997 and to date no issues have been identified in relation to its application. The current Coastal Plan, which includes the same zonal approach and has an equivalent policy, has been demonstrated to be efficient and effective in managing adverse effects in the coastal marine area through interim reviews and state of the environment monitoring. Officers do not believe it necessary nor appropriate to delete Policy 1.</p> <p>Notwithstanding the above, officers note recommendations that give partial relief to other reliefs sought by the submitter. These include amendments to the Policy 1 plus other inconsequential changes in Section 1.7 of the Plan to clarify that the application of the coastal management areas apply only to the coastal marine area.</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Further submissions – Port Taranaki Ltd (32)		Oppose	
Further submissions – Powerco (45), Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd (46)		Support/Oppose in part	
43 – Royal Forest and Bird Protection Society	197	<p>Amend</p> <p>Submitter seeks amendment to Policy 1(a) of the Plan to read:</p> <p><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></p> <p><i>(a) Outstanding Value: Coastal areas of outstanding value (identified in Schedule 2) that characteristically:</i></p> <p><i>(i) are areas of outstanding natural character and/or outstanding natural features or landscapes;</i></p> <p><i>(ii) 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);</i></p> <p><i>(iii) 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</i></p> <p><i>(iv) are iconic to the region's identity and sense of place—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>	<p>Accept in part</p> <p>Officers do not believe it is appropriate or necessary to paraphrase and reference the <i>New Zealand Coastal Policy Statement</i> or other policies in the Plan.</p> <p>Officers also do not believe it necessary to amend Policy 1(a) to delete references to the distinguishing values, characteristics and uses set out in Clauses (ii), (iii) and (iv). Officers note that Policy 1(a) is similar to an equivalent policy in the current Plan for which no issues have been identified in relation to its interpretation and application. Officers note requests by other submitters seeking to have additional values identified.</p> <p>Notwithstanding the above, officers recommend granting relief in part. Officers recommend amendments to Policy 1(a) based upon the relief sought by the submitter (and others) that reads as follows:</p> <p><i>(a) Outstanding Value: <u>These coastal management areas refer to those areas listed in Schedule 1(a) and are identified as having outstanding natural character and/or outstanding natural features or landscapes values. These areas</u> characteristically:</i></p> <p><i>(i) contain values and attributes that are exceptional [...]</i></p>
Further submissions – Port Taranaki (32)		Oppose	
43 – Royal Forest and Bird Protection Society	198	<p>Amend</p> <p>Submitter seeks amendment to Policy 1(a) of the Plan to include specific provisions for marine reserves and protected marine areas under relevant policies.</p>	<p>Decline</p> <p>Officers do not believe it is necessary in Taranaki to include specific provisions for marine reserves and protected marine areas. In Taranaki, all marine reserves already have a high level of protection via the Plan as they have been identified an assessed</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Further submissions – Port Taranaki (32)		Oppose	as Outstanding coastal management areas. Separate standalone policies would be unnecessary and redundant. It is also noted that constraints on use and development also occur under other legislation, including the <i>Marine Reserves Act 1971</i> and the <i>Fisheries Act 1996</i> .
43 – Royal Forest and Bird Protection Society	199	<p>Amend</p> <p>Submitter seeks amendment to Policy 1(b) of the Plan to read:</p> <p><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></p> <p>[...]</p> <p><i>(b) Estuaries Unmodified: Estuaries, not identified in (a) or (c) of this policy, that are permanently open to tidal movements and characteristically:</i></p> <p><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></p> <p><i>(ii) have significantly different and more complex natural processes than the open coast; and</i></p> <p><i>(iii) provide important habitats, migration paths, breeding areas and nursery areas for marine and bird life.</i></p> <p><u><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></u></p>	<p>Accept in part</p> <p>Officers do not believe it is appropriate or necessary to paraphrase and reference the <i>New Zealand Coastal Policy Statement</i> or other policies in the Plan.</p> <p>Officers also do not believe it necessary to amend Policy 1(b) to delete references to the distinguishing values, characteristics and uses set out in Clauses (i), (ii) and (iii). Officers note that Policy 1(b) is similar to an equivalent policy in the current Plan for which no issues have been identified in relation to its interpretation and application. Officers note requests by other submitters seeking to have additional values identified in this Policy.</p> <p>Notwithstanding the above, officers recommend amendments to Policy 1(b) that partially give effect to the changes sought by the submitter that reads as follows:</p> <p><i>(b) Estuaries Unmodified: <u>These coastal management areas refer to those estuaries, not identified in (a) or (c) of this policy, that are permanently open to tidal movements and listed in Schedule 1(b). These areas do not include estuaries identified in (a) or (c) of this policy</u> and characteristically:</i></p> <p>[...]</p>
Further submissions – Port Taranaki Ltd (32)		Oppose	
43 – Royal Forest and Bird Protection Society	200	<p>Amend</p> <p>Submitter seeks amendment to Policy 1(c) of the Plan to read:</p> <p><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></p>	<p>Accept in part</p> <p>Officers do not believe it is appropriate or necessary to paraphrase and reference the <i>New Zealand Coastal Policy Statement</i> or other policies in the Plan.</p> <p>Officers also do not believe it necessary to amend Policy 1(c) to delete references to the distinguishing values, characteristics and uses set out in Clauses (i), (ii), (iii) and</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		<p>[...]</p> <p>(c) Estuaries Modified: Pātea, Waiwhakaiho and Waitara estuaries that are permanently open to tidal movements and characteristically:</p> <p>(i) have been modified by flood protection works and placement of structures;</p> <p>(ii) are surrounded by urban, extensively modified environments;</p> <p>(iii) have significantly different and more complex natural processes than the open coast; and</p> <p>(iv) provide important habitats, migration paths, breeding areas and nursery areas for marine and bird life.</p> <p><u>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 Estuary Unmodified. They are listed in schedule 1(b) and shown on the Planning maps.</u></p> <p><u>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.</u></p>	<p>(iv). Officers note that Policy 1(c) is similar to an equivalent policy in the current Plan for which no issues have been identified in relation to its interpretation and application. Officers note requests by other submitters seeking to have additional values identified in this Policy.</p> <p>Notwithstanding the above, officers recommend amendments to Policy 1(c) that partially give effect to the changes sought by the submitter that reads as follows:</p> <p>(c) Estuaries Modified: <u>These coastal management areas refer to the Pātea, Waiwhakaiho and Waitara estuaries that are permanently open to tidal movements and listed in Schedule 1(c). These areas</u> characteristically:</p> <p>[...]</p>
Further submissions – Port Taranaki (32)		Oppose	
43 – Royal Forest and Bird Protection Society	201	<p>Amend</p> <p>Submitter seeks amendment to Policy 1(d) of the Plan to read:</p> <p><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></p> <p>[...]</p> <p>(d) Open Coast: Areas of the open coast not identified in (a), (b), (c) and (e) of this Policy that characteristically:</p> <p>(i) are subject to a high energy westerly wave environment and the coastal land behind the foreshore is generally naturally eroding;</p> <p>(ii) include reef systems that provide habitat to marine life, and are valued by Māori for mahinga kai;</p>	<p>Accept in part</p> <p>Officers do not believe it is appropriate or necessary to paraphrase and reference the <i>New Zealand Coastal Policy Statement</i> or other policies in the Plan.</p> <p>Officers also do not believe it necessary to amend Policy 1(d) to delete references to the distinguishing values, characteristics and uses set out in Clauses (i), (ii), (iii) and (iv). Officers note that Policy 1(d) is similar to an equivalent policy in the current Plan for which no issues have been identified in relation to its interpretation and application. Officers note requests by other submitters seeking to have additional values identified in this Policy.</p> <p>Notwithstanding the above, officers recommend amendments to Policy 1(d) that partially give effect to the changes sought by the submitter that reads as follows:</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		<p>(iii) include nationally and regionally important surf breaks identified in Schedule 7 (refer corresponding Policy 19); and</p> <p>(iv) contain fisheries that are recreationally, culturally and commercially valuable.</p> <p><u>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.</u></p> <p><u>All other policies of the plan are relevant to determining values and characteristics of the coastal environment in this area.</u></p>	<p>(d) Open Coast: <u>This coastal management area refers to remaining areas of the coastal marine area Areas of the open coast</u> not identified in (a), (b), (c) and (e) of this Policy that characteristically: [...]</p>
Further submissions – Port Taranaki (32)		Oppose	
43 – Royal Forest and Bird Protection Society	202	<p>Amend</p> <p>Submitter seeks amendment to Policy 1(e) of the Plan to read:</p> <p><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></p> <p>[...]</p> <p>(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;</p> <p>(ii) contains nationally and regionally important infrastructure;</p> <p>(iii) contains port related activities that are accepted as appropriate uses of this coastal management area;</p> <p>(iv) has low levels of natural character, although is located adjacent to an area of outstanding value; and</p> <p>(v) can have significant effects on areas outside of the Port, including contributing to coastal erosion along the New Plymouth foreshore.</p> <p><u>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.</u></p> <p><u>In determining the values and characteristic in these estuaries have particular regard to Policy X Port of Taranaki, Policy 14 Indigenous Biodiversity, Policy X</u></p>	<p>Accept in part</p> <p>Officers do not believe it is appropriate or necessary to paraphrase and reference the New Zealand Coastal Policy Statement or other policies in the Plan.</p> <p>Officers also do not believe it necessary to amend Policy 1(e) to delete references to the distinguishing values, characteristics and uses set out in Clauses (i), (ii), (iii), (iv) and (v). Officers note that Policy 1(e) is similar to an equivalent policy in the current Plan for which no issues have been identified in relation to its interpretation and application. Officers note requests by other submitters seeking to have additional values identified in this Policy.</p> <p>Notwithstanding the above, officers recommend amendments to Policy 1(e) that partially give effect to the changes sought by the submitter that reads as follows:</p> <p>(e) Port: <u>This coastal management area refers to the operational management area of Port Taranaki. The area is a highly modified environment that characteristically:</u></p> <p>[...]</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		<i>High natural character, Policy X other natural character, Policy X other natural features and landscapes and Policy XX water quality.</i>	
Further submissions – Port Taranaki (32)		Oppose	
43 – Royal Forest and Bird Protection Society	203	Amend Submitter seeks amendment to the Plan to include a new Policy specific to the Port of Taranaki and consistent with Policy 9 [Port] of the <i>New Zealand Coastal Policy Statement</i> .	Decline Officers do not believe it is appropriate or necessary to include a new policy specific to the Port to give effect to Policy 9 of the <i>New Zealand Coastal Policy Statement</i> . Officers note the introductory sentence to Section 5 on page 19 that “... when assessing an activity, regard will be had to all relevant general and activity-based policies are to be considered and no individual policy viewed in isolation. ” It is therefore unnecessary to include a new policy specific to the Port when matters outlined in Policy 9 of the <i>New Zealand Coastal Policy Statement</i> have been more fully covered and addressed via Policy 1 [Coastal management areas], Policy 5 [Use and development], Policy 6 [Regionally important infrastructure] and Policy 7 [Reverse sensitivity]. These and the other General Policies and relevant Activity Policies will contribute to the efficient and safe operation of Port Taranaki.
Further submissions– Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd (46)		Support in part	
45 – Powerco	204	Amend Submitter supports Policy 1 of the Plan 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>	Decline Officers recommend declining the relief sought by the submitter in that the suggested amendments are for a value or attribute that is not a distinguishing feature of the coastal management area. Policy 1 sets out a zonal approach for the application of rules in the coastal marine area. The coastal marine area has been divided into five coastal management areas based upon shared values, characteristics, uses, vulnerability or sensitivity, and different management needs. The zones allow rules to ‘bundle’ compatible activities or effects of these activities together and restrict activities or effects which are incompatible. The coastal management areas enable some activities, and restrict other activities.
Further submissions – Transpower (26)		Support	
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Oppose	As noted in Policy 1(a), (b) and (c) the listed matters refer to attributes and values characteristic of the area. There is no value in identifying values and attributes (already recognised and provided for by policies elsewhere) and which can occur anywhere in the coastal marine area.
	205	Amend	Decline

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd		Submitter supports Policy 1 of the Plan 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>	Officers recommend declining the relief sought by the submitter in that the suggested amendments are for a value or attribute that is not a distinguishing feature of the coastal management area. Policy 1 sets out a zonal approach for the application of rules in the coastal marine area. The coastal marine area has been divided into five coastal management areas based upon shared values, characteristics, uses, vulnerability or sensitivity, and different management needs. The zones allow rules to 'bundle' compatible activities or effects of these activities together and restrict activities or effects which are incompatible. The coastal management areas enable some activities, and restrict other activities. As noted in Policy 1(a), (b) and (c) the listed matters refer to attributes and values characteristic of the area. There is no value in identifying values and attributes (already recognised and provided for by policies elsewhere) and which can occur anywhere in the coastal marine area.
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Oppose	
47 – Fonterra	206	Amend Submitter seeks amendment to Policy 1 of the Plan to include a new clause (d)(v) that reads: <i>(d) Open Coast: Areas of the open coast not identified in (a), (b), (c) and (e) of this Policy characteristically:</i> <i>[...]</i> <i>(v) may contain infrastructure, structures and activities that enable people and communities to provide for their economic and social wellbeing.</i>	Decline Officers recommend declining the relief sought in that the suggested amendments are for a value or attribute that is not a distinguishing feature of the coastal management area. Policy 1 sets out a zonal approach for the application of rules in the coastal marine area. The coastal marine area has been divided into five coastal management areas based upon shared values, characteristics, uses, vulnerability or sensitivity, and different management needs. The zones allow rules to 'bundle' compatible activities or effects of these activities together and restrict activities or effects which are incompatible. The coastal management areas enable some activities, and restrict other activities. As noted in Policy 1(a), (b) and (c) the listed matters refer to attributes and values characteristic of the area. There is no value in identifying values and attributes (already recognised and provided for by policies elsewhere) and which can occur anywhere in the coastal marine area.
Further submissions – Transpower (26), Powerco (45)		Support	
58 – Te Atiawa	207	Amend Submitter seeks amendment to Policy 1(b) and (c) of the Plan to re-instate (from the Draft Coastal Plan) the following characteristics for Estuaries Unmodified and Estuaries Modified:	Accept Officers agree to amend Policy 1(b) and (c) as through the exercise of mapping sites of significance to Māori, inevitably estuaries have been identified as important for a

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		<i>[...] valued by Māori for Mahinga Kai.</i>	variety of reasons, including mahinga kai. Officers recommend granting the relief, alongside other potential cultural, spiritual, historical and traditional associations:
Further submissions – Te Korowai o Ngāruahine Trust (41), Te Rūnanga o Ngāti Ruanui Trust (61)		Support	<i>[...] are valued by Māori for taonga species, and cultural, spiritual, historical and traditional associations.</i>
59 - KiwiRail	208	Support Retain Policy 1 of the Plan as notified	Accept Policy 1 is retained subject to minor amendments as requested by other submitters that do not change the policy intent.
61 – Te Rūnanga o Ngāti Ruanui Trust	209	Amend Submitter seeks amendment to Policy 1(a) of the Plan (and associated schedules) to include: <ul style="list-style-type: none"> • Tangahoe – Hawera – Manutahi Reef system • Patea Beach and the Patea River Estuary • Ohawe – Manawapou – Waihi Beaches. 	Decline Policy 1(a) identifies coastal management areas of outstanding (exceptional) natural character and/or outstanding natural features and landscapes across the Taranaki region. Outstanding Value coastal management areas were based upon the current Coastal Plan. However, through the Coastal Plan review additional investigations were carried out, which resulted in a few additional sites being identified. However, that assessment did not identify the aforementioned areas as being exceptional for their natural character and/or for their natural features and landscapes. This finding is consistent with South Taranaki District Council conclusions as encapsulated in their Proposed District Plan. Officers note that the submitter has not introduced any new information in support of these sites being outstanding natural character, features or landscapes. Notwithstanding the above, officers suggest granting the relief may not be necessary as the Plan already recognises the aforementioned sites as being 'regionally significant' for a variety of reasons, including for the cultural and historical heritage values. The Tangahoe - Hawera – Manutahi reef system is identified in Schedule 3, the Patea Beach and the Patea River Estuary are identified in Schedule 5B, while the Ohawe – Manawapou – Waihi beaches are identified in Schedule 6. The aforementioned places are also identified in Appendix 2 [Statutory acknowledgement] of the Plan (and associated planning maps).
61 – Te Rūnanga o Ngāti Ruanui Trust	210	Amend Submitter seeks amendment to Policy 1(b) of the Plan (and associated schedules) to include: <ul style="list-style-type: none"> • Hauoto Stream • Waihi Stream 	Accept in part Policy 1(b) identifies as a coastal management area larger estuaries identified as having their natural character unmodified. The coastal management areas identified as Estuaries Unmodified were based upon the current Coastal Plan.

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		<ul style="list-style-type: none"> • Katewheta Stream • Waikaikai Stream • Mangaroa Stream • Kaikura Stream • Whenuakura River • Manawapou River. 	<p>With the exception of the Whenuakura River, which is already identified as an Estuary Unmodified, the streams identified by the submitter are relatively small and for spatial mapping and coastal management purposes there is little to differentiate these streams from other streams recognising that, when mapping the stream mouths, the RMA definition of the coastal marine area, where the line crosses these rivers, is "...the point upstream that is calculated by multiplying the width of the river mouth by 5."</p> <p>Notwithstanding the above, of note the aforementioned stream mouths are recognised and have been mapped at a finer spatial scale to recognise that they are regionally significant for their cultural and historic heritage (and other) values. The aforementioned places are identified in Schedule 5B and Appendix 2 [Statutory acknowledgement] of the Plan (and associated planning maps).</p>
61 – Te Rūnanga o Ngāti Ruanui Trust	211	<p>Amend</p> <p>Submitter seeks amendment to Policy 1(b), (c) and (d) of the Plan to include the following characteristics for coastal management areas Estuaries Unmodified, Estuaries Modified and Open Coast:</p> <p><i>[...] provide for taonga species, cultural and traditional associations and cultural heritage.</i></p>	<p>Accept in part</p> <p>Officers agree to amend Policy 1(b) and (c) as through the exercise of mapping sites of significance to Māori, inevitably estuaries have been identified as important for a variety of reasons. Officers recommend granting the relief, alongside other potential cultural, spiritual, historical and traditional associations:</p> <p><i>[...] are valued by Māori for mahinga kai, taonga species, cultural, spiritual, historical and traditional associations.</i></p>
Further submissions – Te Korowai o Ngāruahine Trust (41), Te Atiawa (58)		Support	<p>However, officers recommend Policy 1(d) is retained as currently notified. Officers note that Policy 1(d)(ii) and (iv) already contain a cultural component and therefore no changes to that part of the policy are considered necessary.</p>
NEW Policy 1A – Coastal management areas (Port)			
43 – Royal Forest and Bird Protection Society	212	<p>Amend</p> <p>Submitter seeks amendment to the Plan to include a new Policy specific to the Port of Taranaki and consistent with Policy 9 [Port] of the <i>New Zealand Coastal Policy Statement</i>.</p>	<p>Decline</p> <p>Officers do not believe it is appropriate or necessary to include a new policy specific to the Port to give effect to Policy 9 of the <i>New Zealand Coastal Policy Statement</i>. Officers note the introductory sentence to Section 5 on page 19 that "...when assessing an activity, regard will be had to all relevant general and activity-based policies are to be considered and no individual policy viewed in isolation." It is therefore unnecessary to include a new policy specific to the Port when matters outlined in Policy 9 of the <i>New Zealand Coastal Policy Statement</i> have been more fully covered and addressed via Policy 1 [Coastal management areas], Policy 5 [Use and development], Policy 6 [Regionally important infrastructure] and</p>
Further submissions – Port Taranaki Ltd (32)		Oppose	

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
			Policy 7 [Reverse sensitivity]. These and the other General Policies and relevant Activity Policies will contribute to the efficient and safe operation of Port Taranaki.
Policy 2 – Integrated management			
2 – Federated Farmers	213	Support	Accept
		Submitter notes support of Policy 2 of the Plan as notified	Support noted. Policy 2 is retained subject to amendments sought by other submitters.
7 – Waikato Regional Council	214	Other	No relief necessary
		Submitter seeks that the Council consider, in its Coastal Plan, provisions related to integrated management, cross-boundary issues and the need to work collaboratively with the Waikato Regional Council, which may include incorporating a new section with cross boundary related provisions, or expanding Policy 2 to more explicitly state how cross-boundary matters will be managed through collaboration.	Submitter's comments are noted. Officers note that as part of the development of the Proposed Coastal Plan it considered all matters relating to the structure, format and content of a revised Plan including a stand-alone section setting out integrated management/cross boundary provisions and determined on the approach as adopted in the proposal, which includes a standalone Policy but also includes other Plan provisions that contribute to more effective integrated management including Plan objectives, General Policies and Implementation Methods that apply across the coastal environment.
Further submissions – Te Rūnanga o Ngāti Mutunga (40), Te Atiawa (58)		Support	
7 – Waikato Regional Council	215	Other	No relief necessary
		Notes the Waikato Regional Council will be working collaboratively with other agencies on a long-term strategy on coastal erosion and flooding for the Mokau area.	Comments noted.
Further submissions –Te Atiawa (58)		Support	
12 – Chorus New Zealand Limited	216	Support	Accept
		Retain Policy 2 of the Plan as notified.	Support noted. Policy 2 is retained subject to amendments sought by other submitters.
13 – Spark New Zealand Trading Limited	217	Support	Accept
		Retain Policy 2 of the Plan as notified.	Support noted. Policy 2 is retained subject to amendments sought by other submitters.
Further submissions – Port Taranaki Ltd (32)		Support	

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
14 – Vodafone New Zealand Limited	218	Support	Accept
		Retain Policy 2 of the Plan as notified.	Support noted. Policy 2 is retained subject to amendments sought by other submitters.
19 – South Taranaki District Council	219	Amend	No relief necessary
		Submitter notes support for this policy but requests amendment to Policy 2(e) and (g) of the Plan to add reference to working cooperatively with the territorial local authorities of the region and iwi.	In relation to amending Policy 2(e) and (g) to add reference to working cooperatively with the territorial local authorities of the region and iwi, Officers note that clause (g) already references this and no further amendments are considered necessary.
19 – South Taranaki District Council	220	Amend	Accept
		Submitter seeks amendment to Policy 2(g) of the Plan noting that reference to Policy 15 is in error and should be corrected to Policy 16.	Officers agree to amend the reference.
20 – Meridian Energy Limited	221	Amend	Accept
		Submitter seeks minor amendments to Policy 2(b) and (e) of the Plan to clarify that they apply only to the Taranaki region: <i>Provide for the integrated management of the coastal environment by:</i> [...] <i>(b) implementing policies, methods and rules in other regional plans for Taranaki in relation to managing adverse effects associated with diffuse and direct discharges to freshwater and air, and soil disturbance;</i> [...] <i>(e) considering the effects of activities in the coastal marine area on outstanding natural features and landscapes or areas of outstanding natural character identified in other regional or district plans for the Taranaki Region.</i>	Officers agree to the relief sought and will clarify in Policy 2(b) and (e) that the Taranaki region is the area being managed.
Further submissions – Te Atiawa (58)		Oppose	
20 – Meridian Energy Limited	222	Amend	Accept
		Amend Clause (c) of Policy 2 of the Plan to clarify what is meant by “cross-media effects”.	Cross-media effects refer to effects that may traverse environmental domains, e.g. activities that occur on land such as a discharge that have an impact on water quality. Officers recommend amendments to Policy 2 to clarify the concept of cross-media effects by deleting clause (c) and inserting a new clause (aa) that reads as follows:

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
			<i>(aa) recognising ki uta ki tai and taking into account the connected nature of resources and natural processes in the management of adverse effects across air, land, fresh water bodies and the coastal environment; [...]</i>
21 – Climate Justice Taranaki	223	<p>Amend</p> <p>Submitter notes support for this policy but suggests amendment to Policy 2(g) of the Plan to add reference to working cooperatively with government departments and authorities (e.g. Environmental Protection Authority) to avoid, mitigate and manage any potential impacts from activities proposed/conducted in the Exclusive Economic Zone (e.g. seabed and petroleum mining), on Taranaki's coastal environment.</p>	<p>No relief necessary</p> <p>Support noted. In relation to amending Policy 2(g) to add reference to working cooperatively with the government departments and authorities, officers note that clause (g) already references this and further amendment to specify which departments under what scenarios is not considered necessary.</p>
26 – Transpower NZ Ltd	224	<p>Amend</p> <p>Submitter seeks amendment to Policy 2(f) of the Plan to read: <i>Provide for the integrated management of the coastal environment by: [...]</i> <i>(f) managing natural and physical coastal resources in a manner that recognises and provides for has regard to the social, economic and cultural objectives and well-being of the community, and the functional, technical, operational and/or locational constraints of nationally or regionally important infrastructure [...]</i></p>	<p>Accept</p> <p>The submitter requests this policy is amended to provide a stronger directive approach. The request is accepted as the sought wording gives effect to Policy 1 and Policy 3 of the <i>National Policy Statement for Electricity Transmission</i>. Officers recommend granting the relief sought by the submitter.</p>
29 – Department of Conservation	225	<p>Amend</p> <p>Submitter seeks amendment to Policy 2(c) of the Plan to clarify how taking into account the potential for cross media effects and the connections between freshwater bodies and coastal water will provide for integrated management.</p>	<p>Accept in part</p> <p>The submitter suggests that Policy 2(c) is unclear and would like to know how Clause (c) of Policy 2 will provide for integrated management of the coastal area.</p> <p>Integrated management, for the purposes of the Plan, means managing use, development and protection of natural and physical resources as a whole. It recognises that natural and physical resources exist as parts of complex and inter-connected social and biophysical systems, where effects on one part of the system may affect other parts of the system. Integrated management also recognises that the management of systems involves a number of agencies with different roles and responsibilities. Clause (c) – management of cross-media effects – is therefore an essential part of integrated coastal management.</p> <p>Cross-media effects refer to effects that may traverse environmental domains, e.g. activities that occur on land such as a discharge that have an impact on water quality. In the case of the coastal marine area, activities inside the coastal marine area may have an adverse effect on the wider coastal environment, or vice versa. Therefore,</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
			<p>such effects need to be recognised and taken into account when implementing the Plan.</p> <p>No precise details of amendments sought to Policy 2(a) have been provided. However, officers recommend, in response to this and other submissions, amending Policy 2 to clarify the concept of cross-media effects by deleting clause (c) and inserting a new clause (aa) that reads as follows:</p> <p><i>(aa) recognising ki uta ki tai and taking into account the connected nature of resources and natural processes in the management of adverse effects across air, land, fresh water bodies and the coastal environment; [...]</i></p>
35 – Radio New Zealand Ltd	226	<p>Support</p> <p>Retain Policy 2 of the Plan as notified</p>	<p>Accept</p> <p>Support noted. Policy 2 is retained subject to amendments sought by other submitters.</p>
40 – Te Rūnanga o Ngāti Mutunga	227	<p>Support</p> <p>Submitter seeks amendment to Policy 2(a) of the Plan to read: <i>Provide for the integrated management of the coastal environment by: [...]</i> <i>(a) implementing policies under section 5.1 of the Plan in managing the effects of activities (positive and negative adverse) undertaken in the coastal marine area on significant values and characteristics of the wider coastal environment [...]</i></p>	<p>Accept</p> <p>Officers agree with the relief sought and agree that the use of “adverse” provide a clearer meaning of Policy 2 and makes it consistent with other wording within the Proposed Plan and the RMA.</p>
Further submissions – Te Korowai o Ngāruahine Trust (41)		Support	
43 – Royal Forest and Bird Protection Society	228	<p>Amend</p> <p>Submitter suggests that the current wording of Policy 2 of the Plan does not give effect to Policy 4 [Integration] and Policy 5 [Land or waters managed of held under other acts] of the <i>New Zealand Coastal Policy Statement</i> and is not consistent with the purpose of the RMA set out in Section 5.</p>	<p>Decline</p> <p>No precise details of amendments sought to Policy 2 have been provided but officers believe that Plan provisions, when read as a whole, give effect to the relief sought by the submitter and no further change is necessary.</p> <p>Officers note that there is no <i>New Zealand Coastal Policy Statement</i> requirement for a single agency, and/or a single planning document, to give effect to all its policies. The Proposed Coastal Plan is one of a number of planning instruments necessary to give effect to the <i>New Zealand Coastal Policy Statement</i>. Other agencies and other planning instruments also have a role to play.</p> <p>Officers further note the introductory sentence to Section 5 on page 19 that “...when assessing an activity, regard will be had to all relevant general and activity-</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
			based policies are to be considered and no individual policy viewed in isolation. Officers believe the 'suite' of General Policies plus relevant Activity Policies triggered by use and development activities in the coastal marine area address, amongst other things, the matters set out in Policy 4 [Integration] and Policy 5 [Land or waters managed or held under other acts] of the <i>New Zealand Coastal Policy Statement</i> and is consistent with the purpose of the RMA as set out in Section 5 of the Act.
43 – Royal Forest and Bird Protection Society	229	<p>Amend</p> <p>Submitter seeks amendment to Policy 2(a) of the Plan to read: <i>Provide for the integrated management of the coastal environment by:</i> <i>(a) implementing policies under section 5.1 of the Plan in managing the <u>location, form and limits</u> effects 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 on significant</u> values and characteristics of the wider coastal environment; [...]</i></p>	<p>Accept in part</p> <p>The relief sought to Policy 2(a) seem to be district plan oriented and unnecessary confines the scope of the Policy to the protection and preservation of indigenous biodiversity, natural character, and natural feature and landscapes. Other matters addressed within Section 5.1 [General Policies] of the Plan are excluded. The relief sought further confines the scope of the Policy to focus only on the "protection" of specific natural and physical resources to the exclusion of recognising and providing for use and development.</p> <p>Officers note that the matters/values that the submitter wishes to protect are adequately provided for in other Policies within the Plan, for example Policy 9 [Natural character and natural features and landscapes] and Policy 14 [Indigenous Biodiversity]. Officers encourage users to read the Policies section as a whole, as intended, and recognise that all policies apply.</p> <p>Notwithstanding the above, officers recommend making some of the changes to Policy 2(g) that give partial relief to the changes sought by the submitter. It is recommended that Policy 2(g) be amended to read: <i>Provide for the integrated management of the coastal environment by:</i> <i>(a) implementing Plan provisions in managing the <u>location, form and limits</u> of activities (positive and <u>adverse</u>) undertaken in the coastal marine area on significant values and characteristics of the wider coastal environment; [...]</i></p>
Further submissions – Radio New Zealand (35)		Oppose	
43 – Royal Forest and Bird Protection Society	230	<p>Amend</p> <p>Submitter seeks amendment to Policy 2(b) of the Plan to read: <i>Provide for the integrated management of the coastal environment by: [...]</i> <i>(b) implementing policies, methods and rules in other regional plans in relation to <u>managing</u> adverse effects associated with diffuse and direct discharges to freshwater and air, and soil disturbance; [...]</i></p>	<p>Decline</p> <p>The submitter considers the term "manage" to be uncertain and points out that "avoidance" is required by the <i>New Zealand Coastal Policy Statement</i>.</p> <p>Officers are unclear as to what the concerns are. It is the officer's view that managing adverse effects is an accurate description of what the Plan is attempting to do. It is not the officer's view that the <i>New Zealand Coastal Policy Statement</i> adopts a strictly "avoidance" regime. As previously noted in other submission points. The Policies</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
			must be read together. In addition to the General Policies, Activity –specific Policies 22 to 30, provide the guidance and direction necessary that, when read together, give effect to the <i>New Zealand Coastal Policy Statement</i> .
43 – Royal Forest and Bird Protection Society	231	<p>Amend</p> <p>Submitter seeks amendment to Policy 2(e) of the Plan to read: <i>Provide for the integrated management of the coastal environment by:</i> <i>(e) considering the effects of activities in the coastal marine area on outstanding natural features and landscapes or areas of outstanding natural character <u>or significant indigenous biodiversity</u> identified in other regional or district plans; [...]</i></p>	<p>Accept</p> <p>Officers recommend granting the relief sought noting that activities in the coastal marine area can quite clearly have adverse effects on significant indigenous biodiversity as identified in other regional or district plans. It is recommended that Policy 2(e) be amended to read: <i>(e) considering the effects of activities in the coastal marine area on outstanding natural features and landscapes or areas of outstanding natural character <u>or significant indigenous biodiversity</u> identified in other regional or district plans <u>for the Taranaki region</u>;</i></p>
Further submissions – Te Korowai o Ngāruahine Trust (41)		Support	
43 – Royal Forest and Bird Protection Society	232	<p>Amend</p> <p>Submitter expresses concern regarding Policy 2(c) of the Plan, which contains terminology that does not have a common meaning.</p>	<p>Accept</p> <p>The submitter has not expanded upon this comment and officers assume they refer to “cross media effects”. In response to this and other submissions, officers recommend amending Policy 2 by deleting Clause (c) and inserting a new Clause (aa) that adopts a more plain English reading but also includes the principle of ki uta ki tai or interconnectedness.</p> <p>The new Clause (aa) would reads as follows: <i>(aa) recognising ki uta ki tai and taking into account the connected nature of resources and natural processes in the management of adverse effects across air, land, fresh water bodies and the coastal environment; [...]</i></p>
43 – Royal Forest and Bird Protection Society	233	<p>Amend</p> <p>Submitter seeks amendment Policy 2(d) or Schedule 1 of the Plan to specify which areas have legal protection</p>	<p>No relief necessary</p> <p>Officers note that all policies must be read together. Policy 1(a)(iii) already identifies marine areas with legal protection, these being Parininihi Marine Reserve, Ngā Motu/Sugar Loaf Islands Marine Protected Area and Tapuae Marine Reserve. Furthermore, the associated planning maps also specify which marine areas have legal protection. Further Plan changes as requested by the submitter to Policy 2(d) or Schedule 1 are not necessary or appropriate.</p>
	234	Amend	Accept in part

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
43 – Royal Forest and Bird Protection Society		Submitter seeks amendment to Policy 2(g) of the Plan to provide for collaboration consistent with Policies 4 and 5 of the <i>New Zealand Coastal Policy Statement</i> .	The submitter suggests that Policy 2(g) is uncertain as it appears to limit collaboration to Policy 15 matters [historic heritage] of the Plan. The submitter has identified a drafting error in the Policy whereby reference to working collaboratively with tangata whenua in accordance with Policy 15 [Historic heritage] is meant to be a reference to Policy 16 [Relationship with tangata whenua].
45 – Powerco	235	Amend Submitter supports Policy 2 of the Plan subject to the amendment of Policy 2(f) to read: <i>Provide for the integrated management of the coastal environment by: [...]</i> <i>(f) managing natural and physical coastal resources in a manner that has regard to the social, economic and cultural objectives and well-being of the community and the functional <u>need</u> and/or location constraints of nationally or regionally important infrastructure; and [...]</i>	Accept Officers agree with the submitter that reference to “ <i>functional need</i> ” provides more clarity to Plan users. The request within Policy 2(f) is accepted on this basis. Officers recommend amending Policy 2(g) to include “ <i>functional need</i> ”, The amended Policy 2(g), which includes other reliefs sought by other submitters, would read as follows: <i>(f) managing natural and physical coastal resources in a manner that has regard to <u>recognises and provides for</u> the social, economic and cultural objectives and well-being of the community and the functional, <u>technical, operational needs</u> and/or <u>locational</u> constraints of nationally or regionally important infrastructure; <u>and industry</u> [...]</i>
46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	236	Amend Submitter seeks amendment to Policy 2(f) of the Plan to read: <i>Provide for the integrated management of the coastal environment by: [...]</i> <i>(f) managing natural and physical coastal resources in a manner that has regard to the social, economic and cultural objectives and well-being of the community and the functional <u>need</u> and/or location constraints of nationally or regionally important infrastructure; and [...]</i>	Accept See relief offered in submission point 235 above.
Further submissions – Transpower (26)		Support	
47 – Fonterra	237	Amend Submitter generally supports Policy 2 of the Plan subject to an amendment to Policy 2(f) to read: <i>Provide for the integrated management of the coastal environment by: [...]</i> <i>(f) managing natural and physical coastal resources in a manner that has regard to the social, economic and cultural objectives and well-being of the community</i>	Accept The submitter supports Policy 2 but believes the provisions should be extended to include regionally significant industry alongside regionally significant infrastructure. This request is made as the submitter considers that it is appropriate to recognise nationally and regionally important industry to the same extent as infrastructure, given

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		<i>and the functional and/or location constraints of nationally or regionally important infrastructure and industry; [...]</i>	the contribution of significant industry to the social and economic wellbeing of the region.
Further submissions – Federated Farmers (2)		Support	Officers agree with the submitter regarding this amendment and will include “ <i>industry</i> ” as requested in the submission.
Further submissions –Te Korowai o Ngāruahine Trust (41), Te Atiawa (58)		Oppose	
48 – Taranaki District Health Board	238	Amend Submitter seeks amendment to Policy 2(g) of the Plan to read: <i>Provide for the integrated management of the coastal environment by: [...]</i> <i>(g) working collaboratively with government departments, territorial authorities, district health boards, other agencies, and tangata henua in accordance with Policy 15 [...]</i>	Accept The submitter requests specific reference to “district health boards” in Policy 2(g). Officers believe that the suggested amendment to explicitly recognise the close working relationship between the Council and the Taranaki District Health Board, particularly in relation to coastal water quality, is appropriate.
50 – Te Kāhui o Taranaki Trust	239	Amend Submitter seeks amendment to Policy 2(a) of the Plan to read: <i>Provide for the integrated management of the coastal environment by:</i> <i>(a) implementing policies under section 5.1 of the Plan in managing the effects of activities (positive and negative adverse) undertaken in the coastal marine area on significant values and characteristics of the wider coastal environment [...]</i>	Accept Officers recommend granting the relief sought by the submitter and agree that the use of “adverse” provides Plan users with a clearer meaning of Policy 2 and makes it consistent with other wording within the Proposed Plan and the RMA.
51 – Taranaki Energy Watch	240	Support Submitter supports the integrated management principles of Policy 2 of the Plan, in particular integrated activities to oil and gas activities that cross jurisdictional boundaries as well as being managed under multiple regimes.	Accept Support noted. Policy 2 is retained subject to amendments sought by other submitters.
58 – Te Atiawa	241	Support Submitter supports the integrated management principles of Policy 2 of the Plan, in particular integrated activities to oil and gas activities that cross jurisdictional boundaries as well as being managed under multiple regimes.	Accept Support noted. Policy 2 is retained subject to amendments sought by other submitters.
58 – Te Atiawa	242	Support	Accept

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		Submitter seeks amendment to Policy 2 of the Plan to read: <i>Provide for integrated management of the coastal environment by:</i> <i>(a) implementing policies under section 5.1 of the Plan in managing the effects of activities (positive and negative adverse) undertaken in the coastal marine area on significant values and characteristics of the wider coastal environment [...]</i>	Officers recommend granting the relief sought by the submitter.
59 - KiwiRail	243	Support Retain Policy 2(f) of the Plan as notified.	Accept Support noted. Policy 2(f) is retained subject to minor amendments sought by other submitters.
Policy 3 – Precautionary approach			
5 – Point Board Riders	244	Support Retain Policy 3 of the Plan as notified.	Accept Policy 3 is retained subject to amendments sought by other submitters.
20 – Meridian Energy Limited	245	Support Retain Policy 3 of the Plan as notified.	Accept Policy 3 is retained subject to amendments sought by other submitters.
Further submissions 32 – Port Taranaki Ltd (32), Fonterra (47)		Support	
29 – Department of Conservation	246	Support Retain Policy 3 of the Plan as notified.	Accept Policy 3 is retained subject to amendments sought by other submitters.
37 – Petroleum Exploration and Production Association of NZ	247	Support Retain Policy 3 of the Plan as notified.	Accept Policy 3 is retained subject to amendments sought by other submitters.
43 – Royal Forest and Bird Protection Society	248	Amend The submitter references Policy 3 [Precautionary approach] of the <i>New Zealand Coastal Policy Statement</i> and notes that “adaptive management” is not included within the parameters of the precautionary approach. The submitter suggests that because it is not referenced within the <i>New Zealand Coastal Policy Statement</i> it should not be included within Policy 3 as it is not inherently precautionary but is, instead, a trial and error approach.	Accept Officers recommend granting the relief sought. Recent case law has recognised the adaptive management approach as an insufficient method of dealing with activities for which the effects may be uncertain, unknown or little understood, but are potentials significantly adverse. Due to the level of risk involved in such activities, officers suggest there is no need to refer to adaptive management as being part of the precautionary approach. Indeed there are risks in doing so.

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		Submitter seeks amendment to Policy 3 of the Plan to remove reference to "adaptive management".	Officers recommend amending Policy 3 to remove reference to the adaptive management approach. This will better align the Policy with Policy 3 [Precautionary approach] of the <i>New Zealand Coastal Policy</i> and would read as follows: <i>Adopt a precautionary approach which may include an adaptive management approach where the effects of any activity on the coastal environment are uncertain, unknown, or little understood, but potentially significantly adverse.</i>
Further submissions – Trans-Tasman Resources Ltd (6), Meridian Energy Ltd (20), Petroleum Exploration and Production Association of New Zealand (37)		Oppose	
Further submissions – Taranaki Energy Watch (51)		Support	
43 – Royal Forest and Bird Protection Society	249	<p>Amend</p> <p>The submitter requests that Policy 3 include reference to the effects of climate change in order to provide for Policy 3(2) of the <i>New Zealand Coastal Policy Statement</i> which requires a precautionary approach to be adopted to use and management of coastal resources potentially vulnerable to the effects of climate change.</p> <p>Submitter seeks rewording of Policy 3 of the Plan to include reference to the effects of climate change and give effect to Policy 3 of the <i>New Zealand Coastal Policy Statement</i>.</p>	<p>No relief necessary</p> <p>Officers agree the precautionary approach is necessary for resources that may be vulnerable to the effects of climate change. However, the mention of climate change within Policy 3 is not considered necessary as it has been provided for elsewhere in the Plan.</p> <p>Officers note that all Policies must be read together and there are additional Policies that incorporate a precautionary approach to climate change. In particular, Policies 20 [Coastal hazards] and 46 [Reclamation] require structures, reclamations and works to be assessed over at least 100 year time frame to take into account the expected effects of climate change and sea level rise. Officers recommend that Policy 3 be kept high level to promote its broad application to all coastal related issues rather than just climate change.</p>
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Support	
46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	250	<p>Support</p> <p>Retain Policy 3 of the Plan as notified.</p>	
50 – Te Kāhui o Taranaki Trust	251	<p>Amend</p> <p>Submitter seeks amendment to Policy 3 of the Plan to read: <i>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.</i></p>	<p>Decline</p> <p>Officers note that Policy 3 and the adoption of the precautionary approach contributes to giving effect to Policy 3 [Precautionary approach] of the <i>New Zealand Coastal Policy Statement</i>. The <i>New Zealand Coastal Policy Statement</i> requires coastal plans to adopt a precautionary approach toward proposed activities where the effects to the coastal environment are uncertain, unknown, or little understood.</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Further submissions – Taranaki Energy Watch (51)		Oppose	Given the coastal environment is a dynamic environment, the effects of activities may often be uncertain, unknown or little understood. Accordingly, it is considered appropriate that Policy 3 adopt a cautious approach when uncertain about the effects of use and development activities in the coastal management area.
55 –Kiwis Against Seabed Mining	252	Other Submitter states 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.	No relief necessary Officers note that all General Policies and relevant Activity-specific Policies need to be read together. Policy 3 is a General Policy that applies when considering all use and development activities in the coastal marine area, including oil and gas, fishing and sea bed mining if the effects of those activities are uncertain, unknown or little understood. Activities that have well understood effects will be managed using best industry practice and will also be required to fulfil the other requirements of the Plan.
Further submissions – Petroleum Exploration and Production Association of New Zealand (37)		Oppose	
Further submissions – Taranaki Energy Watch (51), Te Rūnanga o Ngāti Ruanui Trust (61)		Support	
56 – Greenpeace	253	Other Submitter states 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.	No relief necessary Officers note that all General Policies and relevant Activity-specific Policies need to be read together. Policy 3 is a General Policy that applies when considering all use and development activities in the coastal marine area, including oil and gas, fishing and sea bed mining if the effects of those activities are uncertain, unknown or little understood. Activities that have well understood effects will be managed using best industry practice and will also be required to fulfil the other requirements of the Plan.
Further submissions – Petroleum Exploration and Production Association of New Zealand (37)		Oppose	
Further submissions – Taranaki Energy Watch (51), Te Rūnanga o Ngāti Ruanui Trust (61)		Support	
58 – Te Atiawa	254	Amend Submitter seeks amendment to Policy 3 of the Plan to read: <i>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.</i>	Decline Officers note that Policy 3 and the adoption of the precautionary approach contributes to giving effect to Policy 3 [Precautionary approach] of the <i>New Zealand Coastal Policy Statement</i> . The <i>New Zealand Coastal Policy Statement</i> requires coastal plans to adopt a precautionary approach toward proposed activities where the effects to the coastal environment are uncertain, unknown or little understood.

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Further submissions – Taranaki Energy Watch (51)		Oppose	Given the coastal environment is a dynamic environment, the effects of activities may often be uncertain, unknown or little understood. Accordingly, it is considered appropriate that Policy 3 adopt a cautious approach when uncertain about the effects of use and development activities in the coastal management area.
Policy 4 – Extent and characteristics of the coastal environment			
2 – Federated Farmers	255	<p>Amend</p> <p>Submitter generally supports Policy 4 of the Plan but would like the Plan to be amended to map the coastal environment.</p>	<p>Accept</p> <p>Support noted.</p> <p>Council has worked closely with New Plymouth and South Taranaki district councils in identifying and mapping coastal areas of outstanding natural character and outstanding natural features and landscapes. Both district councils have commenced or about to commence their respective district plan reviews, which includes a coastal protection zone.</p> <p>For the purposes of integrated management and to promote alignment between the respective regional and district plans it is recommended that the Plan (and associated GIS layers and planning maps) be amended to include an indicative extent of the coastal environment that is aligned with the district plans.</p> <p>Of note Policy 4 is still retained and aligns with Policy 1 of the <i>New Zealand Coastal Policy Statement</i>. Through the consenting process there will be opportunities for Council to further consider the indicative line and to confirm the extent and characteristics of the coastal environment on a case-by-case basis.</p>
19 – South Taranaki District Council	256	<p>Support</p> <p>Retain Policy 4 of the Plan as notified.</p>	<p>Accept</p> <p>Support noted. Policy 4 is retained subject to amendments to include a coastal environment line.</p>
Further submissions – Port Taranaki Ltd (32)		Support	
29 – Department of Conservation	257	<p>Amend</p> <p>Submitter seeks amendment to or deletion of Policy 4 of the Plan to instead identify and map the landward extent of the coastal environment.</p>	<p>Accept in kind</p> <p>Policy 4 gives effect to Policy 1 of the <i>New Zealand Coastal Policy Statement</i> in that it identifies the characteristics of the coastal environment line. Council has worked closely with New Plymouth and South Taranaki district councils in identifying and mapping coastal areas of outstanding natural character and outstanding natural features and landscapes. Both district councils have commenced or about to</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
			<p>commence their respective district plan reviews, which includes a coastal protection/environment zone.</p> <p>For the purposes of integrated management and to promote alignment between the respective regional and district plans, officers recommend that Policy 4 and associated GIS layers and planning maps be amended to identify an indicative landward extent of the coastal environment that is aligned with the district plans. However, officers consider that it is important for Policy 4 to continue to recognise and provide for opportunities, through the consenting process, to further consider the extent and characteristics of the coastal environment on a case by case basis.</p> <p>The reader is referred to the Department of Conservation's guidance on the <i>New Zealand Coastal Policy Statement</i>. The guidance notes that the term 'coastal environment' is an environment in which the coast is a significant part or element, However, the guidance notes the difficulties in setting out an abstract definition which is capable of simple and ready application to any given situation. What constitutes the coastal environment will vary from place to place and according to the position from which a place is viewed.</p> <p>Officers do not recommend deleting Policy 4, however, In order to recognise the difficulty in drawing a definitive line (also due to the high chance of change to the coastline over time which may make any given line or marker redundant) officers suggest to include an indicative line to identify the coastal environment and the following consequential amendments to Policy 4:</p> <p>The revised Policy would read as follows:</p> <p><i>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 <u>having regard to:</u></i></p> <p><i><u>(a) having particular regard to the indicative coastal environment line as identified in Schedule 1A; and</u></i></p> <p><i><u>(b) on a case by case basis, recognising:</u></i></p> <p><i>(i) 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</i></p> <p><i>(ii) 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></p>
	258	Amend	Accept in kind

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
35 – Radio New Zealand Ltd		<p>The submitter considers the current wording of Policy 4 to be too broad and may be difficult to implement in practice. They would also like clarification as to whether the Radio New Zealand Ltd facilities fall within or outside of the “coastal environment”, because it is not clear what the threshold is for “significance” of coastal processes or influences.</p> <p>Submitter seeks amendment to Policy 4 of the Plan to read:</p> <p><i>Determine the inland extent of the coastal environment for the purpose of policies under Section 5.1 of the Plan on a case by case basis by having regard to:</i></p> <p><i>(a) areas where coastal processes, influences or qualities are significant, <u>and where activities may cause adverse effects on significant values and characteristics in the coastal marine area</u>, including coastal lakes, lagoons, tidal estuaries, saltmarshes, coastal wetlands and the margins of these areas [...]</i></p>	<p>The reader is referred to the Department of Conservation’s guidance on the <i>New Zealand Coastal Policy Statement</i>. The guidance notes that the term ‘coastal environment’ is an environment in which the coast is a significant part or element. However, the guidance notes the difficulties in setting out an abstract definition which is capable of simple and ready application to any given situation. What constitutes the coastal environment will vary from place to place and according to the position from which a place is viewed.</p> <p>Officers do not recommend amending Policy 4(a) in the manner suggested by the submitter but do agree with amending the Plan to provide greater certainty in relation to where the coastal environment lies. It is recommended that the Plan (and associated GIS layers and planning maps) be amended to identify the indicative extent of the coastal environment that is aligned with the district plans. Such a line would make it easier for the submitter to assess whether their facilities fall within or outside the coastal environment.</p> <p>The revised Policy would read as follows:</p> <p><i>Determine the inland extent of the coastal environment for the purposes of policies under Section 5.1 of the Plan <u>on a case by case basis</u> by <u>having regard to:</u></i></p> <p><i>(a) <u>having particular regard to the indicative coastal environment line as identified in Schedule 1A; and</u></i></p> <p><i>(b) <u>on a case by case basis, recognising:</u></i></p> <p><i>(i) 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</i></p> <p><i>(ii) 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></p>
43 – Royal Forest and Bird Protection Society	259	<p>Amend</p> <p>Submitter seeks amendment to Policy 4 of the Plan to remove “case by case”.</p>	<p>Decline</p> <p>Officers do not recommend granting the relief sought by the submitter but do propose an alternative relief that may address some of their concerns.</p>
Further submissions – Meridian Energy Ltd (20)		<p>Support in part</p>	<p>For the purposes of integrated management and to promote alignment between the respective regional and district plans, Officers recommend that Policy 4 and associated GIS layers and planning maps be amended to identify an indicative landward extent of the coastal environment that is aligned with the district plans. However, officers consider that it is important for Policy 4 to continue to recognise</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
			<p>and provide for opportunities, through the consenting process, to further consider the extent and characteristics of the coastal environment on a case by case basis.</p> <p>The reader is referred to the Department of Conservation's guidance on the <i>New Zealand Coastal Policy Statement</i>. The guidance notes that the term 'coastal environment' is an environment in which the coast is a significant part or element. However, the guidance notes the difficulties in setting out an abstract definition which is capable of simple and ready application to any given situation. What constitutes the coastal environment will vary from place to place and according to the position from which a place is viewed and potential changes to that environment over time.</p> <p>The revised Policy would read as follows:</p> <p><i>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:</i></p> <p><i><u>(a) having particular regard to the indicative coastal environment line as identified in Schedule 1A; and</u></i></p> <p><i><u>(b) on a case by case basis, recognising:</u></i></p> <p><i>(i) 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</i></p> <p><i>(ii) 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></p>
43 – Royal Forest and Bird Protection Society	260	<p>Amend</p> <p>Submitter seeks amendment to Policy 4 of the Plan to capture the extent and characteristics in Policy 1 of the <i>New Zealand Coastal Policy Statement</i></p> <p>OR</p> <p>Alternatively amend Policy 4 to refer to the extent of the coastal environment set out on the planning maps and that the maps identify the landward extent as per Policy 1 of the <i>New Zealand Coastal Policy Statement</i>.</p>	<p>Accept</p> <p>The submitter (and others) are seeking certainty in terms of delineating the landward extent of the coastal environment.</p> <p>Policy 4 gives effect to Policy 1 of the <i>New Zealand Coastal Policy Statement</i> in that it identifies the characteristics of the coastal environment line. Council has worked closely with New Plymouth and South Taranaki district councils in identifying and mapping coastal areas of outstanding natural character and outstanding natural features and landscapes. Both district councils have commenced or about to commence their respective district plan reviews, which includes a coastal protection/environment zone.</p>
Meridian Energy Ltd (20)		Support in part	For the purposes of integrated management and to promote alignment between the respective regional and district plans it is recommended that Policy 4 (and associated
Further submissions – Radio New Zealand (35)		Support in part/Oppose in part	

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
			<p>GIS layers and planning maps) be amended to include an indicative extent of the coastal environment that is aligned with the district plans.</p> <p>The revised Policy would read as follows:</p> <p><i>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:</i></p> <p><i>(a) having particular regard to the indicative coastal environment line as identified in Schedule 1A; and</i></p> <p><i>(b) on a case by case basis, recognising:</i></p> <p><i>(i) 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</i></p> <p><i>(ii) 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></p>
45 – Powerco	261	<p>Amend</p> <p>The submitter notes that Policy 4 sets out a case by case approach to defining the coastal environment. The submitter believes that such an approach is neither efficient nor effective and would lead to significant costs and uncertainties, including potential disputes as to whether the Coastal Plan for Taranaki is relevant to a particular activity. The submitter suggests deleting the Policy as currently worded and replacing it with comprehensive mapping of the coastal environment (not just the coastal marine area).</p> <p>Submitter seeks amendment to the Plan by deleting Policy 4 and referring to a comprehensive map of the coastal environment in its place:</p> <p><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:</i></p> <p><i>(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</i></p> <p><i>(b) the geographic extent to which activities within the coastal</i></p>	<p>Accept in kind</p> <p>The reader is referred to the Department of Conservation's guidance on the <i>New Zealand Coastal Policy Statement</i>. The guidance notes that the term 'coastal environment' is an environment in which the coast is a significant part or element. However, the guidance notes the difficulties in setting out an abstract definition which is capable of simple and ready application to any given situation. What constitutes the coastal environment will vary from place to place and according to the position from which a place is viewed.</p> <p>Officers do not recommend amending Policy 4(a) in the manner suggested by the submitter but do agree with amending the Plan to provide more certainty in relation to where the coastal environment lies. It is recommended that the Plan (and associated GIS layers and planning maps) be amended to include an indicative extent of the coastal environment that is aligned with the district plans.</p> <p>The revised Policy would read as follows:</p> <p><i>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:</i></p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Further submissions – Meridian Energy Ltd (20), Te Rūnanga o Ngāti Ruanui Trust (61)		Oppose	(a) <u>having particular regard to the indicative coastal environment line as identified in Schedule 1A; and</u> (b) <u>on a case by case basis, recognising:</u>
Further submissions – Transpower NZ Ltd (26)		Support	(i) 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
Further submissions – Fonterra (47)		Support in part	(ii) 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.
46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	262	<p>Amend</p> <p>The submitter notes that Policy 4 sets out a case-by-case approach to defining the coastal environment. The submitter believes that such an approach is neither efficient nor effective and would lead to significant costs and uncertainties, including potential disputes as to whether the Coastal Plan is relevant to a particular activity. The submitter is unclear on whether the Council considers the existing terminals of oil companies to be within the coastal environment. The submitter suggests deleting the Policy as currently worded and replacing it with comprehensive mapping of the coastal environment (not just the coastal marine area).</p> <p>Submitter seeks amendment to the Plan by deleting Policy 4:</p> <p>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:</p> <p>(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</p> <p>(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.</p>	<p>Accept in kind</p> <p>The reader is referred to the Department of Conservation's guidance on the <i>New Zealand Coastal Policy Statement</i>. The guidance notes that the term 'coastal environment' is an environment in which the coast is a significant part or element. However, the guidance notes the difficulties in setting out an abstract definition which is capable of simple and ready application to any given situation. What constitutes the coastal environment will vary from place to place and according to the position from which a place is viewed.</p> <p>Officers do not recommend amending Policy 4(a) in the manner suggested by the submitter but do agree with amending the Plan to provide more certainty in relation to where the coastal environment lies. It is recommended that the Plan (and associated GIS layers and planning maps) be amended to include an indicative extent of the coastal environment that is aligned with the district plans.</p> <p>The revised Policy would read as follows:</p> <p><i>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:</i></p> <p>(a) <u>having particular regard to the indicative coastal environment line as identified in Schedule 1A; and</u></p> <p>(b) <u>on a case by case basis, recognising:</u></p> <p>(i) 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</p> <p>(ii) 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.</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
47 – Fonterra	263	Support	Accept
		Retain Policy 4 of the Plan as notified.	Support noted. Policy 4 is retained subject to amendments to include a coastal environment line.
Policy 5 – Appropriate use and development of the coastal environment			
2 – Federated Farmers	264	Support	Accept
		Retain Policy 5 of the Plan as notified.	Support noted. Policy 5 is retained subject to amendments made to offer relief to other submitters concerns where appropriate.
6 – Trans-Tasman Resources Ltd	265	Amend	Accept in part
		<p>Submitter seeks amendments to Policy 5(b), (e), (f) and (g) of the Plan to recognise benefits from non-renewable resources and for the purposes of certainty and clarity in their interpretation and to read as follows:</p> <p><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:</i></p> <p><i>(a) the functional need for [...]</i></p> <p><i>(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;</i></p> <p><i>[...]</i></p> <p><i>(e) 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 risks with particular reference to Policy 20;</i></p> <p><i>(f) the degree to which the activity contributes to the maintenance, enhancement or restoration of natural or historic heritage including by buffering areas and sites of historical heritage value;</i></p> <p><i>(g) the degree to which the activity contributes to the maintenance, enhancement or restoration of public access or public use of the coast including for recreation;</i></p> <p><i>[...]</i></p>	<p>Officers consider the inclusion of “<i>renewable energy</i>” within Policy 5(b) to be in line with the requirements of Policy 6(1)(g) [Activities in the coastal environment] of the <i>New Zealand Coastal Policy Statement</i> to take into account the potential for renewable resources.</p> <p>However, officers consider the addition of mineral resources within the Policy to be in line with Policy 6(2)(a) of the <i>New Zealand Coastal Policy Statement</i> whereby contributions to social, economic and cultural wellbeing of people and communities from use and development, including (but not limited to) the potential for renewable marine energy are recognised. Therefore, officers recommend granting the relief in part whereby the scope of Policy 5(b) is broadened to explicitly recognise mineral resources alongside aquaculture, renewable energy and other marine based energy plus other consequential changes to the Policy as requested by other submitters to read:</p> <p><i>[...]</i></p> <p><i>(b) the benefits to be derived from the other activities at a local, regional and national level, including the existing and potential contribution of petroleum and mineral resources, and the potential contribution of aquaculture, and renewable energy resources;</i></p> <p><i>[...]</i></p>
Further submissions – Karen Pratt (9), Department of Conservation (29),		Oppose	

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Te Atiawa (58), Te Rūnanga o Ngāi Ruanui Trust (61)			
Further submissions – Petroleum Exploration and Production Association of New Zealand (37), Powerco (45), Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd (46), Taranaki Energy Watch (51)		Support	
6 – Trans-Tasman Resources Ltd	266	Amend	Accept
		Submitter seeks amendment to Policy 5(c) of the Plan to recognise that an alternative 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.	Officers recommend amending Policy 5(c) to state that having regard to possible alternative may include consideration of best practicable options for preventing or minimising adverse effects on the environment. The amended clause reads: [...]
Further submissions – Karen Pratt (9), Taranaki Energy Watch (51), Te Atiawa (58)		Oppose	(c) the appropriateness of the proposed design, methodology, whether it is the best practicable option , location or route of the activity in the context of the receiving environment and any possible alternatives, <u>including best practicable options for preventing or minimising adverse effects on the environment</u> [...]
Further submissions –Powerco (45)		Support	
12 – Chorus New Zealand Limited	267	Support	Accept
		Retain Policy 5 of the Plan as notified.	Support noted. Policy 5 is retained subject to amendments made to offer relief to other submitters' concerns where appropriate.
13 – Spark New Zealand Trading Limited	268	Support	Accept
		Retain Policy 5 of the Plan as notified.	Support noted. Policy 5 is retained subject to amendments made to offer relief to other submitters' concerns where appropriate.
14 – Vodafone New Zealand Limited	269	Support	Accept
		Retain Policy 5 of the Plan as notified.	Support noted. Policy 5 is retained subject to amendments made to offer relief to other submitters' concerns where appropriate.
19 – South Taranaki District Council	270	Support	Accept
		Retain Policy 5 of the Plan as notified.	Support noted. Policy 5 is retained subject to amendments made to offer relief to other submitters' concerns where appropriate.

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
20 – Meridian Energy Limited	271	<p>Amend</p> <p>Submitter seeks amendment to Policy 5 of the Plan to read:</p> <p><i>Policy 5: Appropriate <u>subdivision</u>, use and development in the coastal environment</i></p> <p><i>Determine whether <u>subdivision</u>, use and development of the coastal environment is in an appropriate place and form and within appropriate limits by having regard to: [...]</i></p>	<p>Decline</p> <p>Submitter suggests that Policy 5 would better reflect Policy 25 [Subdivision, use, and development in areas of coastal hazard risk] of the <i>New Zealand Coastal Policy Statement</i> by including references to “subdivision”.</p> <p>Officers recommend declining the relief sought by the submitter. Pursuant to Section 63 of the RMA, the purpose of regional plans is to assist a regional council to carry out its functions in order to achieve the purpose of the RMA. Officers therefore do not consider it appropriate or necessary to have policies explicitly addressing the management of activities such as subdivision, which clearly falls outside its statutory functions and where implementation of the policy (or otherwise) lies with other parties (i.e. territorial authorities) under other planning instruments. Of note subdivision is a form of use and is already implicitly addressed in the policy.</p>
25 – New Zealand Petroleum and Minerals	272	<p>Amend</p> <p>Submitter seeks amendment to Policy 5(b) of the Plan to recognise benefits from petroleum and mineral resources to read:</p> <p><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: [...]</i></p> <p><i>(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>; [...]</i></p>	<p>Accept</p> <p>Submitter believes that there should be explicit recognition of the economic and social benefits that petroleum and mineral resources provide the region and requests amending Policy 5 to achieve this.</p> <p>Officers agree and recommend amending Policy 5(b) to read:</p> <p>[...]</p> <p><i>(b) the benefits to be derived from the other activities at a local, regional and national level, including <u>the existing and potential contribution of petroleum and mineral resources, and</u> the potential contribution of aquaculture, and renewable energy resources; [...]</i></p>
Further submissions – Trans-Tasman Resources Ltd (6), Petroleum Exploration and Production Association of New Zealand (37)		Support	
Further submissions – Taranaki Energy Watch (51)		Support in part	
Further submissions – Te Atiawa (58), Te Rūnanga o Ngāti Ruanui Trust (61)		Oppose	
	273	Amend	Accept in part

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
26 – Transpower NZ Ltd		<p>Submitter seeks an amendment to Policy 5 of the Plan to read:</p> <p>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:</p> <p>(a) the functional need or technical, operational and/or locational requirement for the activity to be 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>Officers recommend granting part of the relief sought by the submitter.</p> <p>The suggested amendments have two parts. Officers note that Policy 5 provides direction and guidance on the “appropriateness” of use and development. It is not about providing for <u>all</u> use and development as some use and development is clearly not appropriate having regard to the matters set out in the Policy. Notwithstanding that Officers recommend amending Policy 5(a) to refer to operational requirements (as well as functional needs) for activities located in the coastal marine area.</p> <p>The revised Policy would read as follows:</p> <p>Determine whether use and development of the coastal environment is in an appropriate place location and form and within appropriate limits by having regard to:</p> <p>(a) the functional need or operational requirement for the activity to be located in the coastal marine area. Conversely, aActivities 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); [...]</p>
Further submissions – Trans-Tasman Resources Ltd (6)		Support in part/Neutral in part	
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Oppose	
32 – Port Taranaki	274	<p>Amend</p> <p>The submitter suggests that Policy 5 does not adequately recognise important security and public safety issues facing ports and seeks amendments to Clause (g) that qualifies the enhancement or restoration of public access to exclude the Port and other area where public safety and security needs would be jeopardised.</p> <p>Submitter seeks an amendment to Policy 5(g) to read as follows:</p> <p><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: [...]</i></p> <p><i>(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, unless the type of activity, and the need to maintain public safety, makes enhancement or restoration of public access inappropriate; [...]</i></p>	<p>Accept in kind</p> <p>Officers note that Policy 5 contains a suite of considerations and must be read in conjunction with the other General Policies and relevant Activity-specific Policies. Policy 5(e) already addresses public health and safety risks while Policy 17 [Public access] sets out circumstances where public access would not be appropriate. Accordingly, Officers do not believe it necessary or appropriate to paraphrase other Plan provisions. Indeed there are risks in creating legal uncertainty in doing so. Officers recommend an alternative relief whereby Policy 5(g) is amended to refer to “appropriate” public access or use. Policy 17 would then apply and provides the guidance and direction on what constitutes appropriate public access and use in the coastal environment.</p>
Further submissions – Trans-Tasman Resources Ltd (6), Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd (46)		Support	
Further submissions – Taranaki Energy Watch (51)		Oppose	

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
35 – Radio New Zealand Ltd	275	<p>Amend</p> <p>Submitter seeks amendment to Policy 5(a) of the Plan 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:</i> <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>	<p>Decline</p> <p>Officers recommend declining the relief sought by the submitter. Officers note that Policy 5(a) is deliberately confined to activities being located in the coastal marine area because they have a functional need or operational requirement. This reflects the coastal marine area being a public space. Officers do not believe that such restrictions are necessary or appropriate on the landward part of the coastal environment.</p>
Further submissions – Powerco (45)		Support	
Further submissions – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd (46)		Support in part	
40 – Te Rūnanga o Ngāti Mutunga	276	<p>Amend</p> <p>Submitter seeks amendment to Policy 5 of the Plan to include and new clause and read (based on Policy 4(d) from the Draft Coastal Plan): <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: [...]</i> <i>(dd) <u>avoiding, remedying or mitigating adverse effects on the values and attributes of coastal areas of outstanding value, significant indigenous biodiversity and significant historic heritage and significant amenity values in accordance with policies 8, 11, 12 and 15.</u></i></p>	<p>No relief necessary</p> <p>Officers note the concerns of the submitter with regards to managing activities to avoid, remedy or mitigate adverse effects on the values and attributes of coastal areas of outstanding value, significant indigenous biodiversity, historic heritage and amenity values but believe that the relief is not necessary on the basis that these concerns are addressed separately and in more detail within Policy 8 [Areas of outstanding value], Policy 14 [Indigenous biodiversity], Policy 15 [Historic heritage] and Policy 18 [Amenity values]. It is important to note that the General Policies must be read as a whole and it is not necessary or useful to repeat or paraphrase the provisions of other policies.</p>
40 – Te Rūnanga o Ngāti Mutunga	277	<p>Amend</p> <p>Submitter seeks amendment to Policy 5(j)(iii) of the Plan to read: <i>Provide for the integrated management of the coastal environment by: [...]</i> <i>(j) the degree and significance of actual or potential adverse effects of the activity on the environment, including consideration of: [...]</i> <i>(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 [...]</i></p>	<p>Decline</p> <p>Officers note that effects can always be avoided (e.g. cease operations) but that there is an expectation that if effects cannot be avoided then, at the very least, effects should be remedied or mitigated. Policy 5(j)(iii) deliberately targets those circumstances where effects cannot be remedied or mitigated and therefore whether environmental compensation should apply. It should not be an option in lieu of an avoidance policy.</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Further submissions – Taranaki Energy Watch (51)		Oppose	
41 – Te Korowai o Ngāruahine Trust	278	Amend	No relief necessary
		Submitter supports Policy 5 of the Plan with the recognition that has been given to the extent to which an activity may be commensurate to Māori values, culture, practices and traditions but seek amendment to Policy 5 to reinstate references (from the Draft Coastal Plan) to the protection of indigenous biodiversity, historic heritage and amenity values of the coastal environment.	Officers note the concerns of the submitter with regards to managing activities to avoid, remedy or mitigate adverse effects on the values and attributes of coastal areas of outstanding value, significant indigenous biodiversity, historic heritage and amenity values, but believe that the relief is not necessary on the basis that these concerns are addressed separately within Policy 8 [Areas of outstanding value], Policy 14 [Indigenous biodiversity], Policy 15 [Historic heritage] and Policy 18 [Amenity values]. It is important to note that the Policies must be read as a whole and it is not necessary or useful to repeat or paraphrase the provisions of other policies in this Policy.
43 – Royal Forest and Bird Protection Society	279	Amend	Decline
		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 <i>New Zealand Coastal Policy Statement</i> 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. 	The submitter is seeking a level of specificity not considered appropriate or necessary in the Plan. As previously discussed all Policies must be read as a whole and it is not necessary or useful to repeat or paraphrase the provisions of the <i>New Zealand Coastal Policy Statement</i> . Nor is it considered necessary or appropriate to identify/specify/map appropriate places, forms or limits and conversely identify/specify/map where particular activities are inappropriate. Such matters would generally require a more nuanced consideration having regard to the various policies through the consenting process. Officers further note that there is no aquaculture in Taranaki and nor is there likely to be given the wild and rugged nature of the Taranaki coastal marine area.
Further submissions – Transpower NZ Ltd (26)		Oppose	
43 – Royal Forest and Bird Protection Society	281	Amend	Accept in part
		Submitter seeks amendment to Policy 5 of the Plan to <ul style="list-style-type: none"> • insert “location” instead of “place” • amend Policy 5(b) to remove reference to “aquaculture” from Clause (b) due to the uncertainty of which locations this activity would be allowed and to recognise the potential for renewable energy consistent with Policy 6(2)(a) of the <i>New Zealand Coastal Policy</i> 	Officers agree that the amendment sought to “ <i>appropriate locations</i> ” provides consistency with wording of other provisions within the Plan. Officers further agree to amend Clause (j)(ii) to delete reference to Policy 1. Policy 1 only refers to the coastal management areas while other policies in the Plan (recognising that all General Policies must be read together) are at a finer spatial scale and are likely to be more applicable when determining the sensitivity of the environment. In relation to deleting reference to aquaculture, officers do not recommend granting the relief sought. Policy 8 [Aquaculture] of the <i>New Zealand Coastal Policy Statement</i>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		<p>Statement and if necessary to provide for Policy 8(c) of the <i>New Zealand Coastal Policy Statement</i>.</p> <ul style="list-style-type: none"> remove reference in Clause (j)(ii) to Policy 1 given it does not set out the values and characteristics which require protection under the <i>New Zealand Coastal Policy Statement</i> and is therefore maybe misleading and ambiguous. <p>The changes sought to Policy 5 are as follows:</p> <p><i>Determine whether use and development of the coastal environment is in an appropriate place <u>location</u> and form and within appropriate limits by having regard to:</i></p> <p><i>(a) the functional need for [...]</i></p> <p><i>(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</i></p> <p><i>[...]</i></p> <p><i>(j) the degree and significance of actual or potential adverse effects of the activity on the environment, including consideration of:</i></p> <p><i>(i) cumulative effects of otherwise minor activities;</i></p> <p><i>(ii) the sensitivity of the environment with particular reference to Policy 1; [...]</i></p>	<p>requires those exercising functions and powers under the RMA to recognise the potential contribution of aquaculture by, amongst other things, including provisions for such activities in Coastal Plan. However, unlike other regions, the nature of the Taranaki coast is such that it is not suited to traditional aquaculture activities due to the very rough seas and high turbidity offshore and nil demand for space for aquaculture. Taranaki has no aquaculture and so far has not had to identify Aquaculture Management Areas. Notwithstanding that, some explicit but limited policy recognition in the Plan for aquaculture activities is considered appropriate should changes in technology or in potential species for marine farming occur over the life of the Plan.</p> <p>In relation to amending the Policy to importance of renewable energy, officers believe this has already been provided for within the current drafting of Policy 5(b) of the Plan, which reads:</p> <p><i>(b) the benefits would be derived from the activity at a local, regional and national level, including the potential contribution of aquaculture and marine based <u>renewable energy resources</u> [...]</i></p> <p>However, officers note that other requested amendments have also been made to broaden the scope of the clause and read:</p> <p><i>(b) the benefits to be derived from the other activities <u>at a local, regional and national level, including the existing and potential contribution of petroleum and mineral resources, and</u> the potential contribution of aquaculture, and renewable energy resources; [...]</i></p>
45 – Powerco	281	<p>Amend</p> <p>Submitter seeks amendment to Policy 5(a) and (c) of the Plan to more clearly convey the intent of the Policy and to read as follows:</p> <p><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:</i></p> <p><i>(a) the functional need for the activity to be located in the coastal marine area. Conversely, a Activities that do not have a functional need 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></p> <p><i>[...]</i></p>	<p>Accept in part</p> <p>Officers recommend amending Policy 5(a) as sought by the submitter but note consequential changes made to Clause (c) in response to other submitters to read as follows:</p> <p><i>Determine whether use and development of the coastal environment is in an appropriate place location and form and within appropriate limits by having regard to:</i></p> <p><i>(a) the functional need <u>or operational requirement</u> for the activity to be located in the coastal marine area. Conversely, a Activities that do not have a functional need <u>or operational requirement</u> 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></p> <p><i>(c) the appropriateness of the proposed design, methodology, whether it is the best practicable option, location or route of the activity in the context of the receiving</i></p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		<p>(c) the appropriateness of the proposed design, and methodology, and whether it is the best practicable option, location or route of the activity in the context of the receiving environment and any possible alternatives; [...]</p>	<p>environment and any possible alternatives, <u>including best practicable options for preventing or minimising adverse effects on the environment</u>; [...]</p>
<p>46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd</p>	<p>282</p>	<p>Amend</p> <p>Submitter seeks amendment to Policy 5(a), (c) and (e) of the Plan to read:</p> <p><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:</i></p> <p>(a) the functional need for the activity to be located in the coastal marine area. Conversely, a activities that do not have a functional need 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); [...]</p> <p>(c) the appropriateness of the proposed design, and methodology, and whether it is the best practicable option, location or route of the activity in the context of the receiving environment and any possible alternatives; [...]</p> <p>(e) The degree to which the activity will be threatened by, or contribute to, subject to unacceptable risks or exacerbate adverse effects arising from coastal hazards risk, or pose a threat to public health and safety with particular reference to Policy 20; [...]</p>	<p>Accept in part</p> <p>Officers recommend amending Policy 5(a) as sought by the submitter but recommend an alternative reliefs to that proposed with additional changes made to clauses (c) and (e) in response to other submitters and to reflect that often little can be done to control the coastal hazard risk. The amended clauses to read as follows:</p> <p><i>Determine whether use and development of the coastal environment is in an appropriate place location and form and within appropriate limits by having regard to:</i> [...]</p> <p>(c) the appropriateness of the proposed design, methodology, whether it is the best practicable option, location or route of the activity in the context of the receiving environment and any possible alternatives, <u>including best practicable options for preventing or minimising adverse effects on the environment</u>; [...]</p> <p>(e) the degree to which the activity will be threatened by, or contribute to, subject to unacceptable risks or exacerbated coastal hazards risk, or pose a threat to public health and safety with particular reference to Policy 20; [...]</p>
<p>47 – Fonterra</p>	<p>283</p>	<p>Amend</p> <p>Submitter believes that it is appropriate to provide for structures in the coastal marine area that have an operational requirement to be located in the coastal environment and not limit Policy 5(a) to those activities that have a functional need only.</p> <p>Submitter seeks amendment to Policy 5(a) of the Plan to read:</p> <p><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:</i></p> <p>(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</p>	<p>Accept</p> <p>Officers agree with the relief sought by the submitter. The amendment of Policy 5(a) to provide for activities with an “operational need” to be in the coastal marine area provides for structures that might not have “functional need” to be located within the coastal marine area but nevertheless their operational requirements or constraints justify their presence there.</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		<i>should not be located there (unless the non-marine related activity complements the intended use and function of the area); [...]</i>	
Further submissions – Transpower NZ Ltd (26)		Support in part	
47 – Fonterra	284	<p>Amend</p> <p>Submitter requests specific recognition of the contribution that industries, such as dairy processing, make to the economic and social well-being of the region</p> <p>Submitter seeks amendment to Policy 5(b) of the Plan to read:</p> <p><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:</i></p> <p><i>(b) the benefits to be derived from the activity at a local, regional and national level, including the potential contribution of <u>dairy manufacturing</u>, aquaculture and marine based renewable resources. [...]</i></p>	<p>Decline</p> <p>Officers do not believe that specifically recognising individual industries within Policy 5 is necessary. The requested amendment would introduce an unnecessary level of detail and cause other regional industries to request inclusion of their specific industry within the Policy also. The request is respectfully denied as this level of detail is not considered necessary.</p>
48 – Taranaki District Health Board	285	<p>Support</p> <p>Retain Policy 5 of the Plan as notified.</p>	<p>Accept</p> <p>Support noted. Policy 5 is retained subject to amendments made to offer relief to other submitters concerns where appropriate.</p>
50 – Te Kāhui o Taranaki Trust	286	<p>Amend</p> <p>Submitter seeks amendment to Policy 5(j)(iii) of the Plan to read:</p> <p><i>Provide for the integrated management of the coastal environment by:</i></p> <p><i>[...]</i></p> <p><i>(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 [...]</i></p>	<p>Decline</p> <p>Officers note that effects can always be avoided (e.g. cease operations) but that there is an expectation that if effects cannot be avoided then, at the very least, effects should be remedied or mitigated.</p> <p>Policy 5(j)(iii) deliberately targets those circumstances where effects cannot be remedied or mitigated and therefore whether environmental compensation should apply. It should not be an option in lieu of an avoidance policy.</p>
51 – Taranaki Energy Watch	287	<p>Amend</p> <p>Submitter seeks amendment to Policy 5(j) of the Plan to incorporate the precautionary approach.</p>	<p>Decline</p> <p>The requested amendment is declined as this matter is already addressed in a separately stand-alone policy (Policy 3) that also applies alongside other relevant policies when considering use and development in the coastal marine area.</p>
58 – Te Atiawa	288	<p>Amend</p>	<p>Relief not necessary</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		<p>Submitter seeks amendment to Policy 5 of the Plan to include a new clause and read (based on Policy 4(d) from the Draft Coastal Plan):</p> <p><u>[...] <i>avoiding, remedying or mitigating adverse effects on the values and attributes of coastal areas of outstanding value, significant indigenous biodiversity and significant historic heritage and significant amenity values in accordance with policies 8, 11, 12 and 15.</i></u></p>	<p>Officers note the concerns of the submitter with regards to managing activities to avoid, remedy or mitigate adverse effects on the values and attributes of coastal areas of outstanding value, significant indigenous biodiversity, historic heritage and amenity values, but believe that the relief is not necessary on the basis that these concerns are addressed separately within Policy 8 [Areas of outstanding value], Policy 14 [Indigenous biodiversity], Policy 15 [Historic heritage] and Policy 18 [Amenity values].</p> <p>It is important to note that the Policies must be read as a whole and it is not necessary or useful to repeat or paraphrase the provisions of other policies.</p>
58 – Te Atiawa	289	<p>Amend</p> <p>Submitter seeks amendment to Policy 5(j)(iii) of the Plan to read:</p> <p><i>Determine whether use and development of the coastal environment is an appropriate place and form and within appropriate limits by having regard to: [...]</i></p> <p><i>(j) the degree and significance of actual or potential adverse effects of the activity on the environment, including consideration of: [...]</i></p> <p><i>(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 [...]</i></p>	<p>Decline</p> <p>Officers note that effects can always be avoided (e.g. cease operations) but that there is an expectation that if effects cannot be avoided then, at the very least, effects should be remedied or mitigated.</p> <p>Policy 5(j)(iii) deliberately targets those circumstances where effects cannot be remedied or mitigated and therefore whether environmental compensation should apply. It should not be an option in lieu of an avoidance policy.</p>
59 – KiwiRail	290	<p>Support</p> <p>Retain Policy 5 of the Plan as notified.</p>	<p>Accept</p> <p>Support noted. Policy 5 is retained subject to amendments made to offer relief to other submitters concerns where appropriate.</p>
60 – Te Kaahui o Rauru	291	<p>Other</p> <p>In relation to Policy 5 of the Plan, submitter seeks clarification as to why the aspirations of iwi to “develop, use or protect” was removed from equivalent policy in the Draft Coastal Plan.</p>	<p>No relief necessary</p> <p>In relation to the submitter’s query, following consultation on the Draft Plan, amendments were made to the Plan to highlight to the reader that all General Policies need to be considered collectively (and not individually) in the application of regional rules. It was therefore unnecessary to constantly cross reference individual General Policies to other policies and indeed there are risks inherent in ‘cherry picking’ such policies.</p>
NEW Policy 5A – Aquaculture			
	292	Amend	Decline

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
43 – Royal Forest and Bird Protection Society		<p>Submitter seeks amendment to the Plan by:</p> <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. 	<p>Officers do not consider it appropriate or necessary to identify appropriate place for aquaculture as the Taranaki coastal environment is not currently conducive to aquaculture activities. The nature of the Taranaki coast such that it is not suited to traditional aquaculture activities due to the very rough seas and high turbidity offshore and nil demand for space for aquaculture. Taranaki has no aquaculture and so far has not had to identify Aquaculture Management Areas.</p> <p>As a result the other reliefs requested by the submitter are not necessary, however, officers note that in all instances of resource consent applications all the General Policies (1 to 21) and the relevant Activity Policies will be required to be fulfilled before the activity can be approved.</p>
Further submissions – Department of Conservation (29)		Support	
Policy 6 – Activities important to the well-being of people and communities			
2 – Federated Farmers	293	<p>Amend</p> <p>Submitter seeks amendment to Policy 6 of the Plan to read: <i>Recognise and provide for new and existing infrastructure and farming activities of regional importance or of significance to the social, economic and cultural well-being of people and communities in Taranaki, subject to appropriate management of adverse environmental effects.</i></p>	<p>Decline</p> <p>Council recognises that farming is regionally significant but declines the relief as Policy 6 addresses infrastructure assets, particularly those required to be provided for through national environmental standards and the resulting obligations that regional and district councils recognise and provide for these assets. This approach is consistent with other second generation regional plans.</p>
Further submissions – Te Korowai o Ngāruahine Trust (41), Te Atiawa (58)		Oppose	<p>Officers recommend minor changes to the policy to clarify that policy direction and guidance is on regionally important infrastructure (for which there is a definition). Of note farming activities should be adequately provided for under Policy 5, which determines the ‘appropriateness’ of use and development in the coastal environment by having regard to the benefits to be derived from activities at a local, regional and national level.</p>
19 – South Taranaki District Council	294	<p>Support</p> <p>Retain Policy 6 of the Plan as notified.</p>	<p>Accept</p> <p>Support noted. Policy 6 is retained subject to amendments made to offer relief to other submitters’ concerns where appropriate.</p>
	295	Support	Accept

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
20 – Meridian Energy Limited		Retain Policy 6 of the Plan as notified.	Support noted. Policy 6 is retained subject to amendments made to offer relief to other submitters' concerns where appropriate.
23 – New Plymouth District Council	296	Support	Accept
		Retain Policy 6 of the Plan as notified.	Support noted. Policy 6 is retained subject to amendments made to offer relief to other submitters' concerns where appropriate.
26 – Transpower NZ Ltd	297	Amend	Accept in part
		<p>The submitter supports the intent of Policy 5 but is concerned that infrastructure that is “nationally significant” may not be interpreted to also be “regionally significant”. The submitter further wishes to include explicit recognition of the benefits of a reliable and secure supply of electricity. The submitter believes that such amendments would give better effect to Policy 1 of the <i>National Policy Statement on Electrical Transmission</i>.</p> <p>Submitter seeks amendment to Policy 6 of the Plan to read:</p> <p><i>Recognise and provide for new and existing infrastructure of <u>national or</u> regional importance or of significance to the social, economic and cultural well-being of people and communities in Taranaki, <u>including recognition of the benefits of a reliable, secure and efficient supply of electricity</u>, subject to appropriate management of adverse environmental effects;[...]</i></p> <p>OR</p> <p>Amend the Plan to include a standalone policy which recognises and provides for the benefits of a reliable, secure and efficient supply of electricity.</p>	<p>Of note the definition of “<i>regionally important infrastructure</i>” states that it includes infrastructure of regional and national importance and includes the national electricity grid. Officers do not recommend granting the relief in the manner sought by the submitter but do recommend amending Policies 5 and 6 in response to issues raised by the submitter. The amendments include the addition of a new sub clause for Policy 5 which reads:</p> <p><i>Determine whether use and development of the coastal environment is in an appropriate location and form and within appropriate limits by having regard to: [...]</i></p> <p><i>(aa) whether the activity relates to the use, operation, maintenance and alteration of regionally important infrastructure [...]</i></p> <p>And the amendment of the heading and content of Policy 6 to include reference to the safe and efficient operation of regionally important infrastructure to read (officers note additional amendments as sought by other submitters are also included):</p> <p><i>Policy 6: <u>Activities important to the well-being of people and communities</u> <u>Benefits of regionally important infrastructure</u></i></p> <p><i>Recognise and provide for the benefits of new and existing infrastructure of regionally important to <u>infrastructure</u> or of significance to the social, economic and cultural well-being of people and communities in Taranaki, <u>and provide for the safe and efficient operation of regionally important infrastructure</u> subject to appropriate <u>management avoidance, remediation or mitigation</u> of adverse environmental effects.</i></p>
Further submissions – Powerco (45)		Support in part	
27 – Taranaki Chamber of Commerce	298	Support	Accept
		Retain Policy 6 of the Plan as notified.	Support noted. Policy 6 is retained, however, amendments have been made to offer relief to other submitters' concerns where appropriate.
32 – Port Taranaki	299	Amend	Accept

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		Submitter seeks amendment to Policy 6 of the Plan to better reflect the intention to capture Regionally Important Infrastructure as defined in the definitions section of the Plan.	Officers agree. Officers recommend amending Policy 6 (and making consequential amendments to Policy 5) to specifically refer to “regionally important infrastructure”. The revised Policy would read as follows: <i>Recognise and provide for the benefits of new and existing infrastructure of regionally important tee infrastructure or of significance to the social, economic and cultural well-being of people and communities in Taranaki, and provide for the safe and efficient operation of regionally important infrastructure subject to appropriate management avoidance, remediation or mitigation of adverse environmental effects.</i>
33 - New Zealand Defence Force	300	Support	Accept
		Retain Policy 6 of the Plan as notified.	Support noted. Policy 6 is retained subject to amendments made to offer relief to other submitters' concerns where appropriate.
35 – Radio New Zealand Ltd	301	Support	Accept
		Retain Policy 6 of the Plan as notified.	Support noted. Policy 6 is retained subject to amendments made to offer relief to other submitters' concerns where appropriate.
37 – Petroleum Exploration and Production Association of NZ	302	Support	Accept
		Retain Policy 6 of the Plan as notified.	Support noted. Policy 6 is retained subject to amendments made to offer relief to other submitters' concerns where appropriate.
43 – Royal Forest and Bird Protection Society	303	Amend	Accept
		Submitter seeks amendment to Policy 6 to: <ul style="list-style-type: none"> • provide for new infrastructure as set out in the <i>National Policy Standard – Electricity Transmission</i> • provide for activities regulated under the <i>National Environmental Standards</i> • 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. 	It is officers' view that Policy 6 already provides the relief's sought by the submitter. Officers also refer the submitter to the definition of “regionally important infrastructure” which includes infrastructure and activities covered by national environmental standards. For the purposes of certainty and clarity, however, officers recommend minor changes to Policy 6 that do not change the policy intent. The revised policy would read as follows: <i>Recognise and provide for the benefits of new and existing infrastructure of regionally important tee infrastructure or of significance to the social, economic and cultural well-being of people and communities in Taranaki, and provide for the safe and efficient operation of regionally important infrastructure subject to appropriate management avoidance, remediation or mitigation of adverse environmental effects.</i>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Further submissions – Transpower NZ Ltd (26)		Support in part	
Further submissions – Port Taranaki Ltd (32)		Oppose	
45 – Powerco	304	Amend Submitter seeks amendment to Policy 6 of the Plan to read: <i>Recognise and provide for the safe and efficient operation of new and existing infrastructure of regional importance or of significance to the social, economic and cultural well-being of people and communities in Taranaki, subject to appropriate management of adverse environmental effects.</i>	Accept Accept amendment to Policy 6 to provide for the safe and efficient operation of infrastructure.
46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	305	Amend Submitter seeks amendment to Policy 6 of the Plan to read: <i>Recognise and provide for the safe and efficient operation of new and existing infrastructure of regional importance or of significance to the social, economic and cultural well-being of people and communities in Taranaki, subject to appropriate management of adverse environmental effects.</i>	Accept Accept amendment to Policy 6 to provide for the safe and efficient operation of infrastructure.
47 – Fonterra	306	Amend The submitter seeks the inclusion of “ <i>industry</i> ” alongside infrastructure within Policy 6 as industry also contributes to the social and economic well-being of local and regional communities and suggest that the amendment will provide for the expansion or substantial upgrade of necessary infrastructure and industry while still being subject to appropriate management of adverse environmental effects. Submitter seeks amendment to Policy 6 of the Plan to read: <i>Recognise and provide for new and existing infrastructure and industry of regional importance or of significance to the social, economic and cultural well-being of people and communities in Taranaki, subject to appropriate management of adverse environmental effects.</i>	Decline Council recognises that industry, either individually or cumulatively, may indeed be regionally significant but declines the relief as Policy 6 addresses infrastructure assets, particularly those required to be provided for through national environmental standards and the resulting obligations that regional and district councils recognise and provide for these assets. This approach is consistent with other second generation regional plans. Officers recommend minor changes to Policy 6 to clarify that the policy direction and guidance relates to regionally important infrastructure (for which there is a definition). Of note industrial activities are already provided for under Policy 5, which determines the ‘appropriateness’ of use and development in the coastal environment by having regard to the benefits to be derived from activities at a local, regional and national level.
Further submissions- Federated Farmers (2)		Support	

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
59 – KiwiRail	307	Support	Accept
		Retain Policy 6 of the Plan as notified.	Support noted. Policy 6 is retained subject to amendments made to offer relief to other submitters' concerns where appropriate.
Policy 7 – Impacts on established operations and activities			
2 – Federated Farmers	308	Support	Accept
		Retain Policy 7 of the Plan as notified.	Support noted. Policy 7 is retained subject to amendments made to offer relief to other submitters' concerns where appropriate.
12 – Chorus New Zealand Ltd	309	Support	Accept
		Retain Policy 7 of the Plan as notified.	Support noted. Policy 7 is retained subject to amendments made to offer relief to other submitters' concerns where appropriate.
13 – Spark New Zealand Trading Ltd	310	Support	Accept
		Retain Policy 7 of the Plan as notified.	Support noted. Policy 7 is retained subject to amendments made to offer relief to other submitters' concerns where appropriate.
14 – Vodafone New Zealand Ltd	311	Support	Accept
		Retain Policy 7 of the Plan as notified.	Support noted. Policy 7 is retained subject to amendments made to offer relief to other submitters' concerns where appropriate.
19 – South Taranaki District Council	312	Support	Accept
		Retain Policy 7 of the Plan as notified.	Support noted. Policy 7 is retained subject to amendments made to offer relief to other submitters' concerns where appropriate.
20 – Meridian Energy Ltd	313	Support	Accept
		Retain Policy 7 of the Plan as notified.	Support noted. Policy 7 is retained subject to amendments made to offer relief to other submitters' concerns where appropriate.
26 – Transpower NZ Ltd	314	Support	Accept
		Retain Policy 7 of the Plan as notified.	Support noted. Policy 7 is retained subject to amendments made to offer relief to other submitters' concerns where appropriate.
	315	Support	Accept

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
35 – Radio New Zealand Ltd		Retain Policy 7 of the Plan as notified.	Support noted. Policy 7 is retained subject to amendments made to offer relief to other submitters' concerns where appropriate.
45 – Powerco	316	<p>Amend</p> <p>The submitter suggests that Policy 7 is not considered sufficiently directive to give effect to Objective 3 [Reverse Sensitivity] of the Plan or Policy 1 of the <i>Regional Policy Statement</i>.</p> <p>Submitter seeks amendment to Policy 7 of the Plan to read:</p> <p>Avoid, remedy or mitigate the adverse effects of activities, including reverse sensitivity impacts, on existing lawfully established activities Restricting the establishment or intensification of activities that may result in reverse sensitivity effects by:</p> <p><u>(a) avoiding significant adverse effects on infrastructure of national or regional importance</u></p> <p><u>(b) avoiding, remedying or mitigating other adverse effects on infrastructure of national or regional importance</u></p> <p><u>(c) avoiding, remedying or mitigating adverse effects on other activities.</u></p>	<p>Accept</p> <p>Officers agree to amend Policy 7 in line with the relief sought by the submitter (noting some minor changes are made to align the reading of the Policy with other policies in the Plan). The revised Policy would read as follows:</p> <p>Avoid, remedy or mitigate the adverse effects of activities, including reverse sensitivity impacts, on Protect existing lawfully established activities from reverse sensitivity effects that may arise from the establishment of new activities or the intensification of existing activities by:</p> <p><u>(a) avoiding significant adverse effects on regionally importance infrastructure;</u></p> <p><u>(b) avoiding, remedying or mitigating other adverse effects on regionally important infrastructure; and</u></p> <p><u>(c) avoiding, remedying or mitigating adverse effects on other activities.</u></p>
Further submissions – Transpower NZ Ltd (26)		Support	
46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	317	<p>Amend</p> <p>Submitter suggests that Policy 7 is not sufficiently directive to give effect to Objective 3 [Reverse Sensitivity] of the Plan or Policy 1 of the RPS and seeks amendment to Policy 7 of the Plan to read:</p> <p>Avoid, remedy or mitigate the adverse effects of activities, including reverse sensitivity impacts, on existing lawfully established activities Restricting the establishment or intensification of activities that may result in reverse sensitivity effects by:</p> <p><u>(a) avoiding significant adverse effects on infrastructure of national or regional importance;</u></p> <p><u>(b) avoiding, remedying or mitigating other adverse effects on infrastructure of national or regional importance;</u></p> <p><u>(c) avoiding, remedying or mitigating adverse effects on other activities.</u></p>	<p>Accept</p> <p>Officers agree to amend Policy 7 in line with the relief sought by the submitter (noting some minor changes are made to align the reading of the policy with other policies in the Plan). The revised Policy would read as follows:</p> <p>Avoid, remedy or mitigate the adverse effects of activities, including reverse sensitivity impacts, on Protect existing lawfully established activities from reverse sensitivity effects that may arise from the establishment of new activities or the intensification of existing activities by:</p> <p><u>(a) avoiding significant adverse effects on regionally importance infrastructure;</u></p> <p><u>(b) avoiding, remedying or mitigating other adverse effects on regionally important infrastructure; and</u></p> <p><u>(c) avoiding, remedying or mitigating adverse effects on other activities.</u></p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
47 – Fonterra	318	<p>Amend</p> <p>The submitter supports the inclusion of Policy 7 but suggests amendments are required to make the Policy clearer for Plan users.</p> <p>Submitter seeks amendments to Policy 7 of the Plan to read:</p> <p><i>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.</i></p>	<p>Accept in part</p> <p>Officers agree to amend Policy 7 but recommend alternative wording to that sought by the submitter to provide clearer policy direction in relation to the management of reverse sensitivity effects. The revised Policy would read as follows:</p> <p><i><u>Avoid, remedy or mitigate the adverse effects of activities, including reverse sensitivity impacts, on <u>Protect existing lawfully established activities from reverse sensitivity effects that may arise from the establishment of new activities or the intensification of existing activities by:</u></u></i></p> <p><i><u>(a) avoiding significant adverse effects on regionally importance infrastructure;</u></i></p> <p><i><u>(b) avoiding, remedying or mitigating other adverse effects on regionally important infrastructure; and</u></i></p> <p><i><u>(c) avoiding, remedying or mitigating adverse effects on other activities.</u></i></p>
Further submissions – Taranaki Energy Watch (51)		Oppose	
59 – KiwiRail	319	<p>Support</p> <p>Retain Policy 7 of the Plan as notified.</p>	<p>Accept</p> <p>Support noted. Policy 7 is retained subject to amendments made to offer relief to other submitters concerns where appropriate.</p>
Further submissions – Port Taranaki Ltd (32)		Support	
Policy 8 – Areas of outstanding value			
2 – Federated Farmers	320	<p>Amend</p> <p>Submitter seeks amendment to Policy 8 of the Plan to read:</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> <p><i>(a) avoiding adverse effects of activities on the values and characteristics identified in Schedule 2 that contribute to areas:</i></p> <p><i>(i) having outstanding natural character; and/or</i></p> <p><i>(ii) being outstanding natural features and landscape;</i></p> <p><i>within or adjoining coastal management area – Outstanding Value; and</i></p> <p><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>	<p>Decline</p> <p>Officers recommend declining the relief sought.</p> <p>Officers note that activities undertaken adjoining Outstanding Value areas can, over time, adversely affect the values associated with an outstanding area. Seascapes and visual corridors are important values associated with natural features and landscapes and therefore require protection as per Policy 15 of the <i>New Zealand Coastal Policy Statement</i>. Accordingly, for the purposes of integrated coastal management, it would be inappropriate to exclude consideration of the wider landscape and would derogate from Council's efforts seeking to give effect to Policies 13 and 15 of the <i>New Zealand Coastal Policy Statement</i>.</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Further submissions – Trans-Tasman Resources Ltd (6)		Support in part/neutral in part	
Further submissions – Port Taranaki Ltd (32), Powerco (45), Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd (46)		Support in part	
Further submissions –Te Rūnanga o Ngāti Mutunga (40), Te Atiawa (58), Te Rūnanga o Ngāti Ruanui Trust (61)		Oppose	
6 – Trans-Tasman Resources Ltd	321	<p>Amend</p> <p>The submitter is unsatisfied with Policy 8 as the current wording would require the avoidance of all adverse effects no matter how trivial or transitory. While the current wording is consistent with wording within the <i>New Zealand Coastal Policy Statement</i> (Policy 13 1(a) [Preservation of natural character] and Policy 15(a) [Natural features and natural landscapes]) the Supreme Court in <i>King Salmon</i> recognised that those <i>New Zealand Coastal Policy Statement</i> policies were not intended to ban any effects, no matter how minor, or transitory.</p> <p>Submitter seeks amendment to Policy 8 to read:</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> <p><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></p> <p><i>[...]</i></p>	<p>Accept</p> <p>Officers agree that minor or transitory effects are not required to be avoided within Policy 8 and recommend granting the proposed relief to assist the Plan reader in the interpretation and application of the Policy.</p>
Further submissions – Karen Pratt (9), Bruce Boyd (11), Te Rūnanga o Ngāti Mutunga (40), Taranaki energy Watch (51), Te Atiawa (58), Te Rūnanga o Ngāti Ruanui Trust (61)		Oppose	
Further submissions – Powerco (45), Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd (46)		Support	

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
19 – South Taranaki District Council	322	Amend	Accept
		Retain Policy 8 as notified.	Support noted. Policy 8 is retained subject to a minor amendment to recognise that minor and transitory effects are not required to be avoided.
26 – Transpower NZ Ltd	323	Amend	Decline
		<p>Submitter seeks amendment to Policy 8 of the Plan to delete Clause (b) or replace it with a new clause specifically addressing the National Grid. The submitter wishes that the Plan clearly recognise that the planning and development of transmission infrastructure in the coastal parts of the rural environment should 'seek to avoid' rather than 'avoid' adverse effects on the values and characteristics of outstanding natural landscapes and areas of high natural character. The submitter believes that current wording would be unreasonably restrictive in respect of the planning and development of transmission infrastructure. Further, the submitter explains that Policy 8 of the <i>National Policy Statement of Electricity Transmission</i> requires the National Grid to 'seek to avoid'.</p> <p>Proposed amendments read as follows:</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> <p>[...]</p> <p>(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.</p> <p>OR</p> <p><u>(b) specific to the National Grid, seeking to avoid adverse effects of activities associated with the National Grid on the values and characteristics identified in Schedule 2 that contribute to areas:</u></p> <p><u>(i) having outstanding natural character; and/or</u></p> <p><u>(ii) being outstanding natural features and landscape;</u></p> <p><u>within or adjoining coastal management area – Outstanding Value [...]</u></p>	<p>Officers acknowledge the concerns of the submitter but do not believe any relief is necessary.</p> <p>Officers note all General Policies must be read together. Policies 5, 6 and 7 already recognise the need to provide for the ongoing operation, maintenance, and upgrade of existing infrastructure, particularly in relation to regionally important infrastructure, which includes the national grid.</p> <p>The submitter has highlighted inconsistencies between Policy 15(a) of the <i>New Zealand Coastal Policy Statement</i> (which requires activities to avoid adverse effects) and Policy 8 of the <i>National Policy Statement of Electricity Transmission</i> (which requires activities to seek to avoid). For the purposes of the Plan, the <i>New Zealand Coastal Policy Statement</i> is the eminent statutory regulation and will prevail in the event of any inconsistency.</p> <p>Officers further note all General Policies must be read together. Policies 5, 6 and 7 already recognise the need to provide for the ongoing operation, maintenance, and upgrade of existing infrastructure subject to the appropriate management of environmental effects. Therefore no change to Policy 8 is recommended.</p> <p>What adverse effects are to be avoided and what is 'inappropriate' should be assessed by reference to what is being 'protected'. The higher the value being protected the more likely a development will be inappropriate.</p>
	324	Amend	Accept

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
29 – Department of Conservation		Submitter seeks amendment to 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 42 from inappropriate use and development by [...]</i>	Schedule 1 identifies the five coastal management areas, including those of Outstanding Value, and is specific to the coastal marine area. Schedule 2 provides additional information specific to coastal areas of Outstanding Value and which applies to both the coastal marine area and landward components of the coastal environment. Officers therefore recommend that the suggested amendment be accepted to ensure the broader consideration of values, characteristics and attributes that make these areas outstanding, irrespective of being on the seaward or landward parts of the coastal environment.
Further submissions – Trans-Tasman Resources Ltd (6)		Support	
43 – Royal Forest and Bird Protection Society	325	<p>Amend</p> <p>The submitter suggests that the approach under Policy 8 limits the identification of outstanding natural features and landscapes to those areas set out in schedule 1 and 2. This creates uncertainty as to whether the plan would recognise or enable the identification of other outstanding areas landward of the CMA.</p> <p>The submitter further suggests that the lack of criteria setting out the values and characteristics upon which the outstanding natural features and landscapes were determined means it is uncertain whether the scheduled areas achieve Policy 13 [Preservation of natural character] and 15 [Natural Features and natural landscapes] of the <i>New Zealand Coastal Policy Statement</i>.</p> <p>Submitter seeks amendment to the Plan by deleting Policy 8.</p>	<p>Decline</p> <p>Officers do not believe it necessary or appropriate to delete Policy 8 of the Plan.</p> <p>The issue raised by the submitter refers to the inclusions and identification criteria of the Scheduled areas that relate to Policy 8. Of note, the Council has worked closely with the New Plymouth and South Taranaki district councils in identifying, mapping and describing natural character, features and landscapes along the Taranaki coastline. Much of this work was addressed in a separate report <i>Regional Landscape Study of the Taranaki Coastal Environment</i>, which was prepared and consulted on as part of the Coastal Plan review. This work and consultation on the report informed the section 32 analysis relating to the Plan. Given that coastal areas of outstanding value should, by their definition of being outstanding or exceptional, be clearly identifiable (and that Schedule 2 of the Plan already identifies such areas), Officers do not believe it is necessary to revisit this work.</p>
43 – Royal Forest and Bird Protection Society	326	<p>Amend</p> <p>Submitter seeks amendment to Policy 8 of the Plan to read: <i>Protect the visual quality and the physical, ecological and cultural integrity of coastal areas of outstanding value, including those areas identified in Schedule 42 from inappropriate use and development by:</i></p> <p><i>(a) avoiding adverse effects of activities, including those areas on the values and characteristics identified in Schedule 2, that contribute to areas: [...]</i></p>	<p>Accept in part</p> <p>Schedule 1 identifies the five coastal management areas, including those of Outstanding Value, and is specific to the coastal marine area. Schedule 2 provides additional information specific to coastal areas of Outstanding Value and which applies to both the coastal marine area and landward components of the coastal environment. Officers therefore recommend that the suggested amendment to refer to Schedule 2 (rather than Schedule 1) be accepted to promote the broader consideration of values, characteristics and attributes that make these areas outstanding, irrespective of being on the seaward or landward parts of the coastal environment.</p> <p>Regarding the request to amend Policy 8 to infer that there are outstanding areas not identified in Schedule 2 (i.e. by adding the wordings “include those...”), officers recommend declining this part of the relief sought.</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
45 – Powerco	327	<p>Amend</p> <p>Submitter seeks that the Council revisit mapping of areas of outstanding natural features and landscapes</p> <p>OR</p> <p>amend Policy 8 of the Plan to recognise the presence of infrastructure within areas of outstanding natural features and landscapes by adding a new clause (c) to read:</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> <p><u><i>(c) recognising the need to provide for the ongoing operation, maintenance, and upgrade of existing infrastructure.</i></u></p>	<p>Decline</p> <p>Officers recommend declining the relief sought by the submitter. Of note, the Council has worked closely with the New Plymouth and South Taranaki district councils in identifying and mapping coastal areas of outstanding natural character and outstanding natural features and landscapes and there is alignment between the plans in relation to the areas identified. Mapping was appropriately based on values and attributes of the area rather than the presence (or otherwise) of particular use and development.</p> <p>In relation to the alternative relief of amending Policy 8, Officers do not believe any relief is necessary. Officers note all General Policies must be read together. Policies 5, 6 and 7 already recognise the need to provide for the ongoing operation, maintenance, and upgrade of existing infrastructure.</p>
Further submissions – Transpower NZ Ltd (26)		Support	
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Oppose	
46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	328	<p>Amend</p> <p>Submitter seeks that the Council revisit mapping of areas of outstanding natural features and landscapes</p> <p>OR</p> <p>amend Policy 8 of the Plan by adding a new clause (c) to read:</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> <p><u><i>(c) recognising the need to provide for the ongoing operation, maintenance, and upgrade of existing infrastructure.</i></u></p>	<p>Decline</p> <p>Officers recommend declining the relief sought by the submitter. Of note, the Council has worked closely with the New Plymouth and South Taranaki district councils in identifying and mapping coastal areas of outstanding natural character and outstanding natural features and landscapes and there is alignment between the plans in relation to the areas identified. Mapping was appropriately based on values and attributes of the area rather than the presence (or otherwise) of particular use and development.</p> <p>In relation to the alternative relief of amending Policy 8, officers do not believe any relief is necessary. Officers note all General Policies must be read together. Policies 5, 6 and 7 already recognise the need to provide for the ongoing operation, maintenance, and upgrade of existing infrastructure.</p>
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Oppose	
	329	Amend	No relief necessary

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
60 – Te Kaahui o Rauru		Submitter seeks amendment to Policy 8 to include “underwater” visual quality as part of seascape.	Seascapes do not extend to underwater visual quality. However, officers suggest that Policy 8 already addresses underwater visual quality where that attribute contributes to the sensory or associative values identified in Schedule 2 of the Plan for coastal areas of outstanding values, No change is therefore considered necessary.
Policies 8 to 15 – Natural and historic heritage and values			
41 – Te Korowai o Ngāruahine Trust	330	Amend Submitter seeks amendment to Policies 8 to 15 of the Plan to delete reference to significant adverse effects and replace with <u>adverse effects</u> .	Decline Use of the term “ <i>significant adverse effects</i> ” in policies of the Plan is deliberate. The application of the term will depend upon its context but indicates adverse effects on values and uses of the coastal environment that are more than minor. All activities have some effect and granting the relief would unnecessarily preclude many use and development activities across the coastal environment, regardless of the benefits of the activity and or whether the effects were minor or transitional. Policies 8(a), 12, 14(a) and 15(a) already require a high level of protection through the avoidance of adverse effects on areas of outstanding value, areas where coastal water is to be restored, significant indigenous biodiversity and historic heritage. However, a tiered level of protection has deliberately been adopted whereby other policies provide a lower but still very high level of protection relating to avoiding significant adverse effects on other natural and historic heritage values (refer Policy 9, 13, 14(b) and 15(b)). The Policy references to “ <i>significant adverse effects</i> ” is deliberate and, in the officers' view, appropriate.
Further submissions – Transpower NZ Ltd (26)		Oppose	
Further submissions –Te Rūnanga o Ngāti Mutunga (40), Taranaki Energy Watch (51), Te Atiawa (58), Te Rūnanga o Ngāti Ruanui Trust (61)		Support	
Policy 9 – Natural character and natural features and landscapes			
2 – Federated Farmers	331	Support Submitter supports the list of matters to have regard to in Policy 9 of the Plan.	Accept Support noted. Policy 9 is retained subject to amendments made to offer relief to other submitters' concerns where appropriate
19 – South Taranaki District Council	332	Support Retain Policy 9 of the Plan as notified.	Accept Support noted. Policy 9 is retained subject to amendments made to offer relief to other submitters' concerns where appropriate
20 – Meridian Energy Ltd	333	Amend The submitter believes that the current wording suggests that natural character must be enhanced or restored and argues this not consistent with Policy 14	Accept in part

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		<p>[Restoration of natural character] of the <i>New Zealand Coastal Policy Statement</i> or Policy 10 of the proposed plan.</p> <p>In addition, the submitter considers Clause (iv) of Policy 8 to be outside the scope of the Policy as it relates to historic heritage covered by Policy 15 [Historic heritage].</p> <p>Submitter seeks amendment to Policy 9(a)(i) of the Plan and deletion of Clause (iv) as follows:</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> <p><i>(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></p> <p><i>(i) <u>maintains or</u> contributes to the enhancement or restoration of natural character;</i></p> <p><i>[...]</i></p> <p><i>(iv) <u>maintains the integrity of historic heritage.</u></i></p>	<p>Officers agree that Policy 9(a)(i) be amended to refer to the maintenance of natural character alongside enhancement and restoration and accept this part of the relief sought by the submitter.</p> <p>However, in relation to deleting Clause (vi), officers believe it is appropriate for activities to have regard for, amongst other things, maintaining the integrity of historic heritage. The definition of historic heritage refers to any natural and physical resources that contribute to an understanding and appreciation of New Zealand's history and cultures and includes the wider surroundings. Officers therefore recommend that Policy 9(a)(iv) is retained as notified.</p>
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Oppose	
23 – New Plymouth District Council	334	<p>Support</p> <p>Retain Policy 9 of the Plan as notified.</p>	<p>Accept</p> <p>Support noted. Policy 9 is retained subject to amendments made to offer relief to other submitters' concerns where appropriate.</p>
29 – Department of Conservation	335	<p>Amend</p> <p>Submitter seeks amendment to Policy 9 of the Plan to read:</p> <p><i>Protect all other areas of the natural character, features, and landscapes of the coastal environment not identified in Schedule 2 by: [...]</i></p>	<p>Accept</p> <p>The submitter considers that Policy 9 offers a broader, wider range of considerations and policies for the protection of natural character that should also apply to areas of outstanding value. Officers recommend granting the relief as requested.</p>
Further submissions – Te Rūnanga o Ngāti Mutunga (40), Te Atiawa (58)		Support	
	336	Support	Accept

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
35 – Radio New Zealand Ltd		Retain Policy 9 of the Plan as notified.	Support noted. Policy 9 is retained subject to amendments made to offer relief to other submitters' concerns where appropriate.
37 – Petroleum Exploration and Production Association of NZ	337	Amend	Accept
		Submitter supports Policy 9 of the Plan but seeks amendment to the Policy to avoid subjective language such as “sympathetic” and to refer to positive actions (such as maintain or minimise) rather than negative language. The submitter suggests Policy 9 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 significant adverse effects, and avoiding, remedying and mitigating other adverse effects on natural character and natural features and landscapes by having regard to the extent to which the activity:</i> <i>(i) contributes to the enhancement or restoresation of natural character</i> <i>(ii) is compatible with the existing level of modification to the environment including by having particular regard for Policy 1</i> <i>(iii) is appropriate for the context of the area within the surrounding landscape, its representativeness and ability to accommodate change</i> <i>(iv) is of an appropriate form, scale and design to be sympathetic minimise effects on the character, visual amenity and quality of the existing landforms, features and vegetation (excluding high visibility markers required for safety or conservation purposes) [...]</i>	Subjective wording can create grey areas and issues of interpretation for Plan users. Officers agree that more directive terminology is appropriate to clarify the intent of Policy 9 and recommend that the Policy be amended to read: <i>Protect all other areas of the natural character, features and landscapes of the coastal environment not identified in Schedule 2 by: [...]</i> <i>(a) avoiding significant adverse effects, and avoiding, remedying and mitigating other adverse effects on natural character and natural features and landscapes by having regard to the extent to which the activity:</i> <i>(i) maintains, contributes to the enhancement or restoresation of natural character;</i> <i>(ii) is compatible with the existing level of modification to the environment, including by having particular regard to Policy 1;</i> <i>(iii) is appropriate for the context of the area within the surrounding landscape, its representativeness and ability to accommodate change;</i> <i>(iv) is of an appropriate form, scale and design to be sympathetic to minimise adverse effects on values of the existing landforms, features and vegetation (excluding high visibility markers required for safety or conservation purposes) or is of a temporary nature and any adverse effects are of a short duration and are reversible;</i>
		Further submissions – Trans-Tasman Resources Ltd (6)	Support in part/Oppose in part
Further submissions – Taranaki Energy Watch (51)		Support in part	
40 – Te Rūnanga o Ngāti Mutunga	338	Amend	Accept
		Submitter seeks an amendment to Policy 9(a)(vi) of the Plan 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>	The submitter would like this Policy to maintain consistent wording with other Policies within the section by including specific reference to “historical and cultural heritage” and to reflect the values attached to the sites of significance in Schedule 5B.

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		<p>(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:</p> <p>[...]</p> <p>(vi) Maintain the integrity of historical <u>and cultural</u> heritage.</p>	Officers agreed to the relief sought noting that natural character, features and landscapes may have broader cultural, spiritual and traditional associations not necessarily captured in the RMA definition of "historic heritage".
40 – Te Rūnanga o Ngāti Mutunga	339	<p>Amend</p> <p>Submitter seeks amendment to Policy 9 of the Plan by including a new Clause (b) to differential between 'natural character' and 'natural features and landscapes' to read as follows:</p> <p><u>(b) Recognise that natural character is not the same as natural features and landscapes or amenity values and may include matters such as:</u></p> <p><u>(i) Natural elements, processes and patterns;</u></p> <p><u>(ii) Biophysical, ecological, geological and geomorphological aspects;</u></p> <p><u>(iii) Natural landforms such as headlands, peninsulas, cliffs, dunes, wetlands, reefs, freshwater springs and surf breaks;</u></p> <p><u>(iv) The natural movement of water and sediment;</u></p> <p><u>(v) The natural darkness of the night sky;</u></p> <p><u>(vi) Places or areas that are wild or scenic;</u></p> <p><u>(vii). A range of natural character from pristine to modified and</u></p> <p><u>(viii). Experiential attributes, including the sounds and smell of the sea; and their context or setting.</u></p>	<p>Decline</p> <p>The submitter feels that the requested addition would bring the policy in line with the <i>New Zealand Coastal Policy Statement</i> and add depth to the definition of natural character as protected in the Plan.</p> <p>The requested addition represents an unnecessarily high level of detail, which is essentially supporting information. Such matters were previously addressed in a separate report <i>Regional Landscape Study of the Taranaki Coastal Environment</i>, which was prepared and consulted on as part of the Coastal Plan review.</p> <p>Officers further note that the detail provided by the submitter has already been considered by the Council and has informed the drafting of the Plan and its mapping. Recognition that natural character, natural feature, natural landscapes and amenity values is encompassed within the Plan's definition for those terms, even if those characteristics are not expressly or independently mentioned.</p> <p>Officers believe the proposed relief sought by the submitter is unnecessary and do not recommend amending the Policy as sought by the submitter.</p>
Further submissions – Te Korowai o Ngāruahine Trust (41)		Support	
43 – Royal Forest and Bird Protection Society	340	<p>Amend</p> <p>Submitter seeks amendment to the Plan by deleting Policy 9.</p>	<p>Decline</p> <p>The submitter contends that Policy 9 of the Plan is uncertain as it appears to consider aspects of activities in terms of appropriateness or maintenance which can only be determined once the effect on values are known. To achieve this, the Plan needs to set out guidance for the identification of values or include values for indigenous vegetation and heritage. The inclusion of significant areas of indigenous vegetation and historic heritage overlaps and creates inconsistency with Policies 14 and 15 of the Plan. The application of this policy is particularly uncertain as it does not</p>
Further submissions – Port Taranaki Ltd (32)		Oppose	

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
			<p>recognise that natural character is different to natural features and landscapes, nor does it provide for the assessment or identification required under Policies 13 and 15 of the <i>New Zealand Coastal Policy Statement</i>.</p> <p>Officers do not recommend deleting Policy 9. Through this Coastal Plan review, considerable work has been done to clearly identify areas of outstanding value. Given that coastal areas of outstanding value should, by their definition of being outstanding or exceptional, be clearly identifiable (and that Schedule 2 of the Plan already identifies such areas), officers do not believe it necessary for the Plan to set out an alternative policy framework for such areas.</p> <p>Of note, the Council has worked closely with the New Plymouth and South Taranaki district councils in identifying and mapping coastal areas of outstanding natural character and outstanding natural features and landscapes and there is alignment between the plans in relation to the areas identified.</p>
43 – Royal Forest and Bird Protection Society	341	<p>Amend</p> <p>Submitter seeks amendments to Policy 9 of the Plan by:</p> <ul style="list-style-type: none"> including a new clause that reads: <i>Protect the natural character, features, and landscapes of the coastal environment by: [...]</i> <i>(ix) avoiding adverse effects of activities on natural character of the coastal environment with outstanding natural character and on outstanding natural features;</i> amending Policy 9(a)(v) to read: <i>(v) maintains the integrity of significant areas of indigenous vegetation protects significant indigenous biodiversity and maintains or enhances indigenous biodiversity [...]</i> 	<p>Accept</p> <p>The submitter is concerned that Policy 9 does not provide for avoidance of adverse effects for outstanding values which may not be identified in Schedule 2.</p> <p>The submitter is also concerned that there are inconsistencies with directive policies for protection. In particular, it is the submitter's view that Clause (a)(v) is uncertain as the provisions do not currently identify significant areas of vegetation, nor does it reflect the protection required by Policy 14 [Indigenous biodiversity] of the Plan.</p> <p>Officers agree to the amendments sought in relation to Policy 9 and believe the suggested changes improve the Policy's alignment with Policy 8 [Outstanding areas] and Policy 14 [Indigenous biodiversity].</p>
Further submissions2 – Federated Farmers (2), Port Taranaki Ltd (32)		Oppose	
Further submissions – Radio New Zealand (35)		Oppose in part	
45 – Powerco	342	<p>Amend</p> <p>The submitter wishes to revisit whether regionally important infrastructure falls within areas of natural character and natural features and landscapes, or for</p>	<p>Decline</p> <p>Officers do not believe the requested amendment is necessary. Of note, the Council has worked closely with the New Plymouth and South Taranaki district councils in</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		<p>Policy 9 to recognise the presence of regionally important infrastructure within areas of outstanding natural features and landscapes. The submitter seeks that mapping of areas of natural character and natural features and landscapes be revisited</p> <p>OR</p> <p>that the policy enables the ongoing operation, maintenance and upgrade of such infrastructure by amending Policy 9 of the Plan to include a new clause (ix) to read:</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> <p><i>(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></p> <p>[...]</p> <p><i>(ix) is necessary to provide for the safe and efficient operation, maintenance, upgrade and development of regionally important infrastructure.</i></p>	<p>identifying, mapping and describing natural character, features and landscapes along the Taranaki coastline. Much of this work was addressed in a separate report <i>Regional Landscape Study of the Taranaki Coastal Environment</i>, which was prepared and consulted on as part of the Coastal Plan review. Officers do not believe it is necessary to revisit this work. Mapping was appropriately based on values and attributes of the area rather than the presence (or otherwise) of particular use and development.</p> <p>In relation to the alternative relief of amending Policy 9, officers do not believe any relief is necessary. Officers note all General Policies must be read together. Policies 5, 6 and 7 already recognise the need to provide for the ongoing operation, maintenance, and upgrade of existing infrastructure.</p>
Further submissions – Transpower NZ Ltd (26)		Support	
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Oppose	
46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	343	<p>Amend</p> <p>The submitter wishes to revisit whether regionally important infrastructure falls within areas of natural character and natural features and landscapes, or for Policy 9 to recognise the presence of regionally important infrastructure within areas of outstanding natural features and landscapes. The submitter seeks that mapping of areas of natural character and natural features and landscapes be revisited</p> <p>OR</p> <p>that the policy enables the ongoing operation, maintenance and upgrade of such infrastructure by amending Policy 9 of the Plan to include a new clause (ix) to read:</p>	<p>Decline</p> <p>Officers do not believe the requested amendment is necessary. Of note, the Council has worked closely with the New Plymouth and South Taranaki district councils in identifying, mapping and describing natural character, features and landscapes along the Taranaki coastline. Much of this work was addressed in a separate report <i>Regional Landscape Study of the Taranaki Coastal Environment</i>, which was prepared and consulted on as part of the Coastal Plan review. Officers do not believe it is necessary to revisit this work. Mapping was appropriately based on values and attributes of the area rather than the presence (or otherwise) of particular use and development.</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		<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> <p><i>(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></p> <p>[...]</p> <p><i>(ix) is necessary to provide for the safe and efficient operation, maintenance, upgrade and development of regionally important infrastructure.</i></p>	<p>In relation to the alternative relief of amending Policy 9, officers do not believe any relief is necessary. Officers note all General Policies must be read together. Policies 5, 6 and 7 already recognise the need to provide for the ongoing operation, maintenance, and upgrade of existing infrastructure.</p>
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Oppose	
58 – Te Atiawa	344	<p>Amend</p> <p>The submitter would like Policy 9 to use consistent wording with other Policies and to reflect the values associated with sites of significance in Schedule 5B. Submitter seeks amendment to Policy 9(a)(vi) of the Plan to read:</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> <p><i>(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></p> <p>[...]</p> <p><i>(vi) maintain the integrity of <u>cultural</u> historic heritage.</i></p>	<p>Accept</p> <p>The submitter would like this Policy to maintain consistent wording with other Policies within the section by including specific reference to “historical and cultural heritage” and to reflect the values attached to the sites of significance in Schedule 5B. Officers agreed to the relief sought noting that natural character, features and landscapes may have broader cultural, spiritual and traditional associations not necessarily captured in the RMA definition of “historic heritage”.</p>
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Support	
61 – Te Rūnanga o Ngāti Ruanui Trust	345	<p>Amend</p> <p>The submitter would like Policy 9 to use consistent wording with other Policies and to reflect the values associated with sites of significance in Schedule 5B. Submitter seeks amendment to Policy 9(a)(vi) of the Plan to read:</p>	<p>Accept</p> <p>The submitter would like this Policy to maintain consistent wording with other Policies within the section by including specific reference to “historical and cultural heritage” and to reflect the values attached to the sites of significance in Schedule 5B.</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		<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 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:</p> <p>[...]</p> <p>(vi) maintain the integrity of cultural historic heritage.</p>	Officers agreed to the relief sought noting that natural character, features and landscapes may have broader cultural, spiritual and traditional associations not necessarily captured in the RMA definition of "historic heritage".
NEW Policy 9A – Criteria for identifying areas of outstanding or high natural character			
43 – Royal Forest and Bird Protection Society	346	<p>Amend</p> <p>Submitter seeks amendment to the Plan to include a new Policies that:</p> <ul style="list-style-type: none"> determines/identifies areas outstanding Natural Character to preserve areas of High Natural Character for other natural character in all areas of the coastal environment to provide a basis for determining outstanding natural features and landscapes other natural features and landscapes in all areas of the coastal environment. 	<p>Decline</p> <p>Officers do not believe the requested amendment is necessary. Of note, the Council has worked closely with the New Plymouth and South Taranaki district councils in identifying, mapping and describing natural character, features and landscapes along the Taranaki coastline. Much of this work was addressed in a separate report <i>Regional Landscape Study of the Taranaki Coastal Environment</i>, which was prepared and consulted on as part of the Coastal Plan review. It was this work, which was used for determining and identifying outstanding natural features and landscapes but also examined natural character across the entirety of the Taranaki coastline.</p> <p>Officers further note that the Plan already contains policies addressing the protection of natural character, features and landscapes (Policies 8, 9 and 10) and do not believe additional policies are necessary or appropriate. All General Policies apply to any use and development activities in the coastal marine area and must be read together.</p>
Further submissions20 – Meridian Energy Ltd (20, Port Taranaki Ltd (32)		Oppose	
Further submissions – Department of Conservation – (29)		Support	
Further submissions – Powerco (45)		Oppose in part/Oppose	
Further submissions – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd (46)		Oppose in part	
Policy 10 – Restoration of natural character			
	347	Support	Accept

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
19 – South Taranaki District Council		Retain Policy 10 of the Plan as notified.	Support noted. Policy 10 is retained as notified.
Further submissions – Port Taranaki Ltd (32)		Support	
43 – Royal Forest and Bird Protection Society	348	Support Retain Policy 10 of the Plan as notified.	Accept Support noted. Policy 10 is retained as notified.
45 – Powerco	349	Support Retain Policy 10 of the Plan as notified.	Accept Support noted. Policy 10 is retained as notified.
Further submissions – Federated Farmers (2), Transpower NZ Ltd (26)		Support	
46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	350	Support Retain Policy 10 of the Plan as notified.	Accept Support noted.
49 – Cam Twigley	351	Amend Submitter seeks amendment to Policy 10 of the Plan to include the restoration and rehabilitation of natural character within the Significant Surfing Area.	No relief necessary No precise details of amendments sought to Policy 10 have been provided. However, Officers suggest that Policy 10 does not need the level of specificity sought by the submitter and through, this Plan (but also through other planning mechanisms) there is an opportunity to investigate supporting the restoration and rehabilitation of natural character within the Significant Surfing Area. Policy 10 recognises that the natural character of parts of the coastal environment may be degraded and seeks to provide for the restoration or rehabilitation of the coast where this appropriate. Sensitive or vulnerable coastal habitat types have been highlighted. Rules and other (non regulatory) methods will be used to implement the Policy.
Policy 11 – Coastal water quality			
6 – Trans-Tasman Resources Ltd	352	Amend The submitter questions the practical application of how to maintain and enhance coastal water quality at the same time and seeks to amend Policy 11 of the Plan to read:	Accept in part Officers agree but recommend an additional relief to that requested by the submitter whereby Policy 11 is amended to specify and limit the circumstances where coastal water quality will be maintained or enhanced.

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		<i>Maintain or and enhance coastal water quality by avoiding, remedying and mitigating the adverse effects of activities on [...]</i>	The revised Policy reads as follows: <i>Maintain coastal water quality where it is good and or enhance coastal water quality where it is degraded by avoiding, remedying and mitigating the adverse effects of activities on: [...]</i>
Further Submissions – Federated Farmers (2)		Support in part	
Further Submissions – Te Rūnanga o Ngāti Mutunga (40), Te Atiawa (58), Te Rūnanga o Ngāti Ruanui Trust (61)		Oppose	
19 – South Taranaki District Council	353	Support	Accept
		Retain Policy 11 of the Plan as notified.	Support noted. Policy 11 is retained subject to minor amendments made to offer relief to other submitters' concerns where appropriate.
Further submissions – Port Taranaki Ltd (32)		Support	
40 – Te Rūnanga o Ngāti Mutunga	354	Support	Accept
		Retain Policy 11 of the Plan as notified.	Support noted. Policy 11 is retained subject to minor amendments made to offer relief to other submitters' concerns where appropriate.
43 – Royal Forest and Bird Protection Society	355	Support	Accept
		Retain Policy 11 of the Plan as notified (but seek an additional Policy 11A – refer below).	Support noted. Policy 11 is retained subject to minor amendments made to offer relief to other submitters' concerns where appropriate.
46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	356	Support	Accept
		Retain Policy 11 of the Plan as notified.	Support noted. Policy 11 is retained subject to minor amendments made to offer relief to other submitters' concerns where appropriate.
47 – Fonterra	357	Amend	Accept
		The submitter questions the practical application of how to maintain and enhance coastal water quality at the same time and seeks to amend Policy 11 of the Plan to read: <i>Maintain coastal water quality where it is good and enhance coastal water quality where it is degraded by avoiding, remedying and mitigating the adverse effects of activities on: [...]</i>	Officers agree to the relief sought by the submitter whereby Policy 11 is amended to specify and limit the circumstances where coastal water quality will be maintained or enhanced as requested by the submitter.

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Further submissions – Te Korowai o Ngāruahine Trust (41)		Support	
48 – Taranaki District Health Board	358	Support	Accept
		Retain Policy 11 of the Plan as notified.	Support noted. Policy 11 is retained subject to minor amendments made to offer relief to other submitters' concerns where appropriate.
58 – Te Atiawa	359	Support	Accept
		Retain Policy 11(b) of the Plan as notified.	Support noted. Policy 11(b) is retained as notified.
60 – Te Kaahui o Rauru	360	Amend	Decline
		Submitter seeks amendment to Policy 11 of the Plan to include native species of value to Māori.	<p>Officers do not recommend amending Policy 11 of the Plan to refer to native species of value to Māori. Presence or abundance of native species are not necessarily a meaningful indicator of coastal water quality with some taonga species being quite tolerant of reduced water quality.</p> <p>Officers note Schedule 3 of the Plan identifies areas where there is localised degradation of water quality, which (through Policy 12) will be targeted for enhancement. Of note these 'degraded areas' do contain native species of value to Māori, including shellfish. The issue is not the presence or abundance of these species but <i>E. coli</i> levels are such that there are restrictions on the harvesting of these species.</p> <p>Officers further note that all General Policies need to be read together and that other policies and recommended changes to the Plan may address some of the issues of concern. Native species, including species of value to Māori, are implicitly provided for in Policy 11 in that avoiding, remedying and mitigating adverse effects of activities on the life supporting capacity of coastal water, the mouri and wairua of coastal water and the integrity and functioning of natural coastal processes will contribute to the maintenance and enhancement of native species of value to Māori. Native species are also covered by Policy 14 [Indigenous biodiversity] and Policy 15 [Historic heritage]. Officers are further recommending that a new Policy 14B be included in the Plan to recognise and provide for the maintenance and enhancement of taonga species.</p>
61 – Te Rūnanga o Ngāti Ruanui Trust	361	Amend	No relief necessary
		Submitter seeks amendment to Policy 11 of the Plan to read:	

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		<p>Policy 11: Coastal water quality <i>and mauri values</i></p> <p>Maintain and enhance coastal water quality <i>and mauri values</i> by avoiding, remedying and mitigating the adverse effects of activities on:</p> <p>[...]</p> <p>(a) the <i>mauri or</i> life-supporting capacity of coastal water;</p>	<p>Officers note that mauri values are already addressed within the Policy in Clause (b) and that it is not necessary to repeat the reference as the Policy is already clearly identifying mauri to be a component of coastal water quality. Officers consider that no further relief is necessary.</p>
Further submissions – Te Rūnanga o Ngāti Mutunga (40), Te Korowai o Ngāruahine Trust (41), Te Atiawa (58)		Support	
NEW Policy 11A – Water quality limits			
43 – Royal Forest and Bird Protection Society	362	<p>Amend</p> <p>Submitter seeks amendment to the Plan to include a new Policy 11A [Coastal water quality limits] to achieve Objective 5 [Coastal water quality]. The new Policy would 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.</p>	<p>Decline</p> <p>The submitter does not specify what attributes and numerics would be acceptable for coastal water quality and marine health. Officers have concerns that the adoption of standardised and universal water quality targets and standards would have a perverse outcome in that such targets are likely to be too high or too low depending upon uses and values in the locality. Such matters are best dealt with through the consenting process where the type, scale and significance of the activity and the vulnerability and sensitivities of the receiving environment (including cultural interests), and an appropriate mixing zone may be considered on a case-by-case basis.</p> <p>The Council's approach involves taking into account recognised national/international guideline values as appropriate. Officers note Taranaki only has seven major municipal and/or industrial discharges to the coastal marine area and that coastal water quality is generally good. In localities where that is not the case, a new Policy 12 has been included in the Plan seeking the restoration of local coastal water quality.</p>
Further submissions – Port Taranaki Ltd (32)		Oppose	
Further submissions – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd (46)		Oppose in part	
Policy 12 – Restoration of coastal water quality			
15 – Surfbreak Protection Society	363	<p>Amend</p> <p>The submitter believes that Policy 12 does not provide adequate protection of the awa and coastal areas. The submitter is concerned that waiting until there are significant effects could impact on shellfish gathering, cultural activities, and</p>	<p>Decline</p> <p>Officers note that pursuant to the RMA, the Council will, as a minimum be maintaining Taranaki's generally high coastal water quality. Any activity may have an adverse effect on water quality but, for most activities, their effects are localised or temporal and/or effects can be mitigated.</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		water based recreational activities and seeks that the word "significant" be deleted from the policy.	Policy 12 is a new policy that seeks to restore coastal water quality where it has been degraded. It recognises localised adverse effects where there is <u>already</u> significant adverse effect on coastal ecosystems, natural habitats or water based recreational activities, or is restricting existing uses such as shellfish gathering and cultural activities (these areas are identified in Schedule 3). The use of the term " <i>significant</i> " is deliberate and appropriate and provides context to where restoration will be promoted. It is also consistent with national directions set out in Policy 21 of the <i>New Zealand Coastal Policy Statement</i> . Officers recommend retaining Policy 12 as notified.
46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	364	Support Retain Policy 12 of the Plan as notified.	Accept Support noted. Policy 12 is retained as currently notified.
Further submissions – Port Taranaki Ltd (32)		Support	
61 – Te Rūnanga o Ngāti Ruanui Trust	365	Amend Submitter seeks amendment to Policy 12 of the Plan to read: <i>Policy 12: Restoration of coastal water quality <u>and mauri values</u>.</i>	No relief necessary It is officers' understanding that each iwi group has its own concept of mauri however the term is generally understand it to be the life principle, life force, vital essence, special nature, a material symbol of a life principle, source of emotions – the essential quality and vitality of a being or entity. The term may also refer to a physical object, individual, ecosystem or social group in which the essence is located. Officers have concerns that introducing the term "mauri" and making it a policy requirement to restore mauri (and it being something different from water quality). Policy 13 is a specific policy that, in line with the <i>New Zealand Coastal Policy Statement</i> , is seeking to promote the restoration of coastal water quality in areas (identified in schedule 3) where degraded water quality has resulted in restrictions to existing uses such as shellfish gathering and cultural activities. Under Policy 11 [Coastal water quality] the constituent parts of coastal water quality include the life supporting capacity, mauri, wairua of water and more. Therefore, Policy 12 already addresses mauri as part of the restoration of coastal water quality.
Further submissions – Te Rūnanga o Ngāti Mutunga (40), Te Korowai o Ngāruahine Trust (41), Te Atiawa (58)		Support	
Policy 13 – Coastal air quality			
	366	Amend	Accept

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
6 – Trans-Tasman Resources Ltd		Submitter seeks amendment to Policy 13 of the Plan to read: <i>Maintain or and enhance coastal air quality by avoiding, remedying and mitigating the adverse effects of activities on the life supporting capacity of air.</i>	Officers note that it is appropriate to refer to the maintenance “or” enhancement of coastal water quality as the two actions are mutually exclusive and, therefore, only one can be applied at a time. Officers agree to the relief sought by the submitter.
Further Submissions – Federated Farmers (2)	Support in part		
Further Submissions – Te Rūnanga o Ngāti Mutunga (40), Te Atiawa (58), Te Rūnanga o Ngāti Ruanui Trust (61)	Oppose		
46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	367	Support Retain Policy 13 of the Plan as notified.	Accept Support noted. Policy 13 is retained subject to amendments made to offer relief to other submitters' concerns where appropriate.
Further submissions – Port Taranaki Ltd (32)		Support	
Policy 14 Indigenous biodiversity			
6 – Trans-Tasman Resources Ltd	368	Amend Submitter seeks amendment to Policy 14 of the Plan to read: <i>Protect areas of significant indigenous biodiversity in the coastal environment and maintain and enhance indigenous biodiversity by:</i> <i>(a) avoiding adverse effects of activities on:</i> <i>(i) indigenous taxa that are nationally threatened or at risk (declining), or regionally distinctive, including those identified in Schedule 4A;</i> <i>(ii) taxa that are internationally threatened including those identified in Schedule 4A;</i> <i>(iii) indigenous ecosystems and vegetation types that are threatened in the coastal environment, or are naturally rare, as identified in Schedule 4A;</i> <i>(iv) habitats of indigenous species where the species are at the limit of their natural range, or are naturally rare;</i> <i>(v) areas containing nationally significant examples of indigenous community types; and</i>	Decline The submitter believes there are issues between the Schedules and Policy 14 that sets out to avoid significant adverse effects and avoid, remedy or mitigate other effects on ecosystems and habitats set out in Schedule 4B but do not specify what these issues are. The sought relief involves amending Policy 14 of the Plan and has four parts: <ul style="list-style-type: none"> Reference to ‘at risk’ taxa in Clause (a)(i) to be confined to ‘at risk (declining) taxa: Officers do not recommend granting this relief as it would be inconsistent with Policy 11(a)(i) of the <i>New Zealand Coastal Policy Statement</i> , which requires activities to avoid adverse effects on indigenous taxa listed as ‘at risk’ in the New Zealand Threat Classification System lists. According to that list ‘at risk’ taxa can be further categorised as ‘declining’, ‘recovering’, ‘relict’ and ‘naturally uncommon’. All four categories of ‘at risk’ taxa are appropriately captured by the Policy as currently notified.

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		<p>(vi) areas set aside for full or partial protection of indigenous biological diversity under other legislation; and</p> <p>(b) avoiding significant adverse effects and avoiding, remedying and mitigating other adverse effects of activities on:</p> <p>(i) areas of predominantly indigenous vegetation in the coastal environment;</p> <p>(ii) habitats in the coastal environment that are important during the vulnerable life stage of indigenous species including:</p> <p>i. estuaries;</p> <p>ii. spawning areas (e.g. snapper-trevally spawning area in the North Taranaki Bight between Mōhakatino River and Pariokariwa Point);</p> <p>iii. areas that provide passage for diadromous species;</p> <p>iv. marine mammal resting, feeding and breeding areas; and</p> <p>v. bird roosting and nesting areas;</p> <p>(iii) indigenous ecosystems and habitats found only in the coastal environment and which are particularly vulnerable to modification including estuaries, lagoons, coastal wetlands, dunelands, intertidal zones, rocky reef systems, eelgrass, <u>and saltmarsh areas, and sensitive marine benthic habitats as identified in Schedule 4B; [...]</u></p>	<ul style="list-style-type: none"> Delete reference in Clause (a) to 'regionally distinctive' taxa: Officers do not recommend granting this relief as it would be inconsistent with Bio Policy 4 of the <i>Regional Policy Statement</i>, which refers to, amongst other things, the presence of regionally distinctive species as a criteria for identifying significant indigenous biodiversity values in Taranaki. The category also contributes to giving effect to Policy 11(a)(iv) of the <i>New Zealand Coastal Policy Statement</i>. It is the Council's view that Policy 14 should recognise the local context and provide for the protection of indigenous species that are locally significant to the Taranaki region, irrespective of their national threat status. Delete reference to 'naturally rare' ecosystems and vegetation types: Officers do not recommend granting this relief as it would be inconsistent with Policy 11(a)(iii) of the <i>New Zealand Coastal Policy Statement</i>, which requires activities to avoid adverse effects on indigenous ecosystems and vegetation types that are "naturally rare". Delete reference in Clause (b)(iii) to "sensitive marine benthic habitats": Officers recommend declining the relief sought. Sensitive benthic habitats refer to marine habitats identified in the report https://www.trc.govt.nz/assets/Documents/Plans-policies/CoastalPlanReview/SensitiveHabitats.PDF that have low tolerance to habitat damage and for which the time for the habitat to recover from any damage would be significant. Given the sensitivity and vulnerability of such marine habitats, Officers consider it appropriate that they be recognised and provided for in Policy 14(b)(iii) of the Plan.
Further submissions – Te Rūnanga o Ngāti Mutunga (40), Te Atiawa (58), Te Rūnanga o Ngāti Ruanui Trust (61)		Oppose	
19 – South Taranaki District Council	369	<p>Support</p> <p>Retain Policy 14 of the Plan as notified.</p>	<p>Accept</p> <p>Support noted. Policy 14 is retained subject to amendments made to offer relief to other submitters' concerns where appropriate.</p>
23 – New Plymouth District Council	370	<p>Support</p> <p>Retain Policy 14 of the Plan as notified.</p>	<p>Accept</p> <p>Support noted. Policy 14 is retained subject to amendments made to offer relief to other submitters' concerns where appropriate.</p>
26 – Transpower NZ Ltd	371	<p>Amend</p> <p>Submitter seeks amendment to Policy 14(b) of the Plan to read:</p>	<p>Accept</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		<p>Protect areas of significant indigenous biodiversity in the coastal environment and maintain and enhance indigenous biodiversity by:</p> <p>[...]</p> <p>(b) avoiding significant adverse effects and avoiding, remedying and mitigating other adverse effects of activities on:</p> <p>(i) areas of predominantly indigenous vegetation in the coastal environment;</p> <p>(ii) habitats in the coastal environment that are important during the vulnerable life stage of indigenous species including:</p> <p>i. estuaries;</p> <p>ii. spawning areas (e.g. snapper-trevally spawning area in the North Taranaki Bight between Mōhakatino River and Pariokariwa Point);</p> <p>iii. areas that provide passage for diadromous species;</p> <p>iv. marine mammal resting, feeding and breeding areas; and</p> <p>v. bird roosting and nesting areas;</p> <p><u>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; [...]</u></p>	<p>The <i>National Policy Statement for Electricity Transmission</i> (NPSET) Policy 4 of the NPSET requires the provision of effective operation, maintenance, upgrade and development of the electrical transmission network.</p> <p>Officers recommend granting the relief sought by the submitter to promote better alignment with the requirements of the NPSET. The requested relief would allow operation, maintenance, alteration and development of the electricity transmission network while also providing protection of indigenous biodiversity to minimise any possible effects that may result. The requested relief is in line with Policies 3, 4 and 8 of the NPSET and Policy 6 [Activities in the coastal environment] (1)(a) of the <i>New Zealand Coastal Policy Statement</i>.</p> <p>Officers recommend Policy 14(b) be amended to read:</p> <p><i>Policy 14</i></p> <p>(b) avoiding significant adverse effects and avoiding, remedying and mitigating other adverse effects of activities on:</p> <p>[...]</p> <p><u>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; [...]</u></p>
Further submissions – Port Taranaki Ltd (32)		Support	
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Oppose	
28 – Grant Knuckey	372	Amend	Decline
		Submitter seeks amendment to Policy 14 of the Plan to refer to maintenance, enhancement and restoration of the mauri of wāhi tapu and wāhi taonga areas.	Policy 14 relates to maintenance, enhancement and protection of indigenous biodiversity. Of note, Policy 15 addresses matters relating to historic heritage which encompasses those sites identified as wāhi tapu and wāhi taonga. Therefore, officers do not believe it is necessary or appropriate to address other values within this particular policy.
Further submissions – Trans-Tasman Resources Ltd (6)		Oppose	
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Support	All General Policies need to be read as a suite of policies. Officers recognise that Māori have traditional and continuing relationships with indigenous biodiversity. The identification of wāhi tapu and wāhi taonga sites and places have been identified and mapped where the information has been available. Under Policies 14 and 15 of the

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
			Plan, the consideration of indigenous biodiversity and historic heritage, which includes sites of significance to Māori including wāhi tapu and wāhi taonga areas, would be considered together.
29 – Department of Conservation	373	<p>Amend</p> <p>It is the submitter's view that since the Plan has not defined or mapped areas of significant indigenous biodiversity it is not appropriate to refer to "areas" of significant indigenous biodiversity. Further, the submitter suggests that to incorporate only those areas that have been mapped would limit the protection of indigenous biodiversity to those areas and requests that Policy 14 be expanded to include all indigenous biodiversity in the coastal area.</p> <p>Submitter seeks amendment to Policy 14 of the Plan to read:</p> <p><i>Protect areas of significant indigenous biodiversity in the coastal environment and maintain and enhance indigenous biodiversity by [...]</i></p>	<p>Accept</p> <p>Officers do not believe that the Policy's reference to "areas" refers to mapped areas as suggested by the submitter. Officers note that the Plan's definition of significant indigenous biodiversity reads as meaning areas or habitats that meet criterion set out within this Policy. Notwithstanding that, Officers recommend granting the relief sought in that it represents a small change that better aligns the Policy with the definition of "significant indigenous biodiversity" which has been adopted in the Plan. The revised Policy as follows:</p> <p><i>Protect areas of significant indigenous biodiversity in the coastal environment and maintain and enhance indigenous biodiversity by: [...]</i></p>
Further submissions – Trans-Tasman Resources Ltd (6)		Support	
40 – Te Rūnanga o Ngāti Mutunga	374	<p>Amend</p> <p>Submitter seeks amendment to Policy 14(a) of the Plan to read:</p> <p><i>Protect areas of significant indigenous biodiversity in the coastal environment and maintain and enhance indigenous biodiversity by:</i></p> <p><i>(a) avoiding adverse effects of activities on[...]</i></p> <p><i><u>(vii) taonga species as identified by tangata whenua [...]</u></i></p>	<p>Accept in kind</p> <p>The relief sought by the submitter would have the perverse outcome of derogating from the relationship of tangata whenua culture, values and traditions with the coastal environment. Given the importance of some of these species as mahinga kai, their inclusion in Policy 14 (with its strong avoidance direction) would potentially preclude/restrict customary activities (such as harvesting, fishing) that have adverse effects on their populations, abundance and distribution.</p> <p>Officers recommend an alternative relief that provides for strong recognition and provision for taonga species in the Plan. It is recommended that a new Policy 14B be included to ensure activities avoid, remedy or mitigate adverse effects on taonga species. It is further recommended that a definition for taonga species be provided and a new schedule included to identify taonga species.</p> <p>The new Policy 14B would read as follows:</p> <p><i><u>Policy 14B: Taonga species</u></i></p> <p><i><u>Recognise and provide for the maintenance or enhancement of taonga species as identified in Schedule xyz by:</u></i></p>
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Support	

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
			<p><u>(a) avoiding significant adverse effects of activities on the habitat of taonga species, mahinga kai, tāiapure or mataitai and customary uses and values unless:</u> <u>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; and</u></p> <p><u>(b) avoiding, remedying or mitigating other adverse effects of activities on taonga species habitat, mahinga kai, tāiapure or mataitai.</u></p>
40 – Te Rūnanga o Ngāti Mutunga	375	<p>Amend</p> <p>Submitter seeks amendment of Policy 14 of the Plan to include a new Clause (c) that reads:</p> <p><i>Protect areas of significant indigenous biodiversity in the coastal environment and maintain and enhance indigenous biodiversity by: [...]</i></p> <p><u>(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.</u></p>	<p>Accept in kind</p> <p>Officers do not recommend granting the relief sought by the submitter and instead recommend an alternative relief.</p> <p>Officers believe Policy 16 [Relationship of tangata whenua] is the more relevant policy for recognising the role of tangata whenua as kaitiaki and that that role is not confined to coastal indigenous biodiversity. Officers note that all General Policies (and relevant Activity-specific Policies) must be read together. Accordingly, officers recommend amending Policy 16 to explicitly recognise and provide for the role of tangata whenua as kaitiaki across <u>all</u> aspects of managing use, development and protection in the coastal environment (rather than just biodiversity).</p> <p>The amendment to Policy 16 would read:</p> <p><i>Recognise and provide for the relationship of tangata whenua culture, values and traditions with the coastal environment, <u>including the role of tangata whenua as kaitiaki</u>, and take into account the principles of the Treaty of Waitangi.</i></p>
Further submissions – Te Korowai o Ngāruahine Trust (41)		Support	
	376	Amend	Accept in kind

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
41 – Te Korowai o Ngāruahine Trust		Submitter seeks amendment of Policy 14 of the Plan by: <ul style="list-style-type: none"> referencing Schedule 5B of the Plan expanding the scope of the Policy to also address taonga species. 	<p>The relief sought by the submitter would have the perverse outcome of derogating from the relationship of tangata whenua culture, values and traditions with the coastal environment. Given the importance of some of these species as mahinga kai, their inclusion in Policy 14 (with its strong avoidance direction) would potentially preclude/restrict any activity (such as harvesting) that has adverse effects on their populations, abundance and distribution.</p> <p>Officers recommend an alternative relief that provides for strong recognition and provision for taonga species. It is recommended that a new Policy 14B be included to ensure activities avoid, remedy or mitigate adverse effects on taonga species. It is further recommended that a definition for taonga species be provided and a new schedule included to identify taonga species.</p> <p>The new Policy 14B would read as follows:</p> <p><i><u>Policy 14B: Taonga species</u></i></p> <p><i><u>Recognise and provide for the maintenance or enhancement of taonga species as identified in Schedule xyz by:</u></i></p> <p><i><u>(a) avoiding significant adverse effects of activities on the habitat of taonga species, mahinga kai, tāiapure or mataitai and customary uses and values unless:</u></i></p> <p><i><u>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; and</u></i></p> <p><i><u>(b) avoiding, remedying or mitigating other adverse effects of activities on taonga species habitat, mahinga kai, tāiapure or mataitai.</u></i></p>
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Support	<p><i><u>(a) avoiding significant adverse effects of activities on the habitat of taonga species, mahinga kai, tāiapure or mataitai and customary uses and values unless:</u></i></p> <p><i><u>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; and</u></i></p> <p><i><u>(b) avoiding, remedying or mitigating other adverse effects of activities on taonga species habitat, mahinga kai, tāiapure or mataitai.</u></i></p>
42 – Ngati Hine Hapu of Te Atiawa	377	Other Submitter seeks clarification as to whether shellfish and crayfish, and the habitat for both, are protected by Policy 14 of the Plan.	<p>No relief necessary</p> <p>Officers note that significant indigenous biodiversity protected in Policy 14 are identified in Schedule 4A. While shellfish and crayfish are not identified in that Schedule as threatened, at risk or regionally distinctive species (and as defined by the Plan) they are nevertheless protected under Policy 14, however, the primary habitats of these species, being largely reefs, have a higher level of protection in the Plan compared with other marine habitats and therefore officers wish to assure the submitter that the Plan does afford them some protections as a result.</p> <p>Officers note however that, in response to reliefs sought by other submitter, recommendation to include a new Policy 4B to ensure activities avoid, remedy or mitigate adverse effects on taonga species. It is further recommended that a</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
			<p>definition for taonga species be provided and a new schedule included to identify taonga species that may include shellfish and crayfish.</p> <p>The new Policy 14B would read as follows:</p> <p><u><i>Policy 14B: Taonga species</i></u></p> <p><u><i>Recognise and provide for the maintenance or enhancement of taonga species as identified in Schedule xyz by:</i></u></p> <p><u><i>(a) avoiding significant adverse effects of activities on the habitat of taonga species, mahinga kai, tāiapure or mataitai and customary uses and values unless:</i></u></p> <p><u><i>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; and</i></u></p> <p><u><i>(b) avoiding, remedying or mitigating other adverse effects of activities on taonga species habitat, mahinga kai, tāiapure or mataitai.</i></u></p>
43 – Royal Forest and Bird Protection Society	378	<p>Amend</p> <p>Submitter seeks amendment to Policy 14 of the Plan by removing reference to “maintaining and enhancing indigenous biodiversity” so that it sets out the characteristics and values to be protected under Policy 11 of the <i>New Zealand Coastal Policy Statement</i></p> <p>AND</p> <p>Include a separate policy for the maintenance and enhancement of indigenous biodiversity in the coastal environment</p> <p>AND</p> <p>Include guidance on relevant habitats under Clause (a)(iv).</p>	<p>Accept in part</p> <p>Policy 14 is directly aligned with Policy 11 [Indigenous biodiversity] of the <i>New Zealand Coastal Policy Statement</i>. Although the matters covered in Policy 14 cover most aspects of indigenous biodiversity, the submitter, quite rightly, points out that indigenous biodiversity is much broader than those aspects highlighted in Policy 14. Officers therefore agree that a separate stand-alone policy to address the remaining aspects of indigenous biodiversity not identified in Policy 14 adds value. The new Policy 14A would read as follows:</p> <p><u><i>Policy 14A: Indigenous biodiversity</i></u></p> <p><u><i>Recognise and provide for the maintenance and enhancement of indigenous biodiversity generally in the coastal environment by:</i></u></p> <p><u><i>(a) as far as is practicable, avoiding, remedying and mitigating the adverse effects of activities; and</i></u></p> <p><u><i>(b) when assessing adverse effects on indigenous biodiversity, having regard to the extent of effects, including consideration of:</i></u></p> <p><u><i>(i) the association of the ecological site and values with other interrelated, but not necessarily contiguous, ecological sites and values;</i></u></p> <p><u><i>(ii) the nature, location, extent and design of the proposed development and the effects of these factors on indigenous biodiversity;</i></u></p> <p><u><i>(iii) the degree to which indigenous biodiversity values will be lost, damaged, destroyed, or enhanced, recognising that;</i></u></p>
Further submissions – Powerco (45)		Oppose in part	

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
			<p><i><u>i. the scale of the effect of an activity is proportional to the size and sensitivity of the ecological area and associated indigenous biodiversity values;</u></i> <i><u>ii. discrete, localised or otherwise minor effects not impacting on the ecological area may be acceptable; and</u></i> <i><u>iii. activities with transitory effects may be acceptable, where they can demonstrate the effects are not long-term and/or irreversible.</u></i></p> <p>In relation to adding guidance in the Plan on relevant habitats under clause (a)(iv), habitats of indigenous species where the species are at the limit of their natural range, or are naturally rare. Officers do not believe this level of specificity is necessary or appropriate for a regulatory plan. While the Council contains some information on the distribution and abundance of some indigenous biodiversity species, such information is generally fragmented and incomplete.</p>
43 – Royal Forest and Bird Protection Society	379	<p>Amend</p> <p>Submitter seeks amendment to Policy 14 of the Plan or add a new policy to identify areas of significant indigenous biodiversity including criteria for determination.</p>	<p>Decline</p> <p>Officers note that BIO Policy 4 of the <i>Regional Policy Statement</i> already provides the relief sought by the submitter. BIO Policy 4 reads:</p> <p><i>When identifying ecosystems, habitats and areas with significant indigenous biodiversity values, matters to be considered will include:</i></p> <p><i>(a) the presence of rare or distinctive indigenous flora and fauna species; or</i> <i>(b) the representativeness of an area; or</i> <i>(c) the ecological context of an area.</i></p> <p><i>Once identified as significant, consideration should be given to the sustainability of the area to continue to be significant in future when deciding on what action to be taken (if any) should reasonably and practicably be taken to protect the values of the area.</i></p> <p>Officers do not believe it is necessary for all regional plans to repeat policies set out in other planning instruments and indeed there are risks in unnecessarily paraphrasing other policy instruments. The criteria adopted for identifying significant indigenous biodiversity has been effective as demonstrated by the Council's significant involvement and success in promoting passive and active protection of terrestrial, freshwater and marine sites identified as having regionally significant values.</p>
	380	Amend	No relief necessary

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
43 – Royal Forest and Bird Protection Society		<p>The submitter is concerned that Policy 14(a)(iii) is not broad enough or will not allow for protection of ecosystems or vegetation that may be identified as threatened or naturally rare at a later date. Submitter seeks an amendment to Policy 14(a)(iii) of the Plan to read:</p> <p><i>Protect areas of significant indigenous biodiversity in the coastal environment and maintain and enhance indigenous biodiversity by:</i></p> <p><i>(a) avoiding adverse effects of activities on: [...]</i></p> <p><i>(iii) indigenous ecosystems and habitats found only in the coastal environment and which are particularly vulnerable to modification including estuaries, lagoons, coastal wetlands, dunelands, intertidal zones, rocky reef systems, eelgrass, saltmarsh, and sensitive marine benthic habitats as, including those identified in Schedule 4B; [...]</i></p>	<p>The relief sought is unnecessary as the Policy already notes that the listed types are not an exclusive list.</p> <p><i>iii) indigenous ecosystems and habitats found only in the coastal environment and which are particularly vulnerable to modification including estuaries, lagoons, coastal wetlands, dunelands, intertidal zones, rocky reef systems, eelgrass, saltmarsh, and sensitive marine benthic habitats as identified in Schedule 4B; [...]</i></p>
Further submissions – Te Korowai o Ngāruahine Trust (41)		Support	
43 – Royal Forest and Bird Protection Society	381	<p>Other</p> <p>Submitter comments that Policy 14 of the Plan is unclear about how clause (a) (<i>avoiding adverse effects of activities on: [...]</i>) and clause (b) (<i>avoiding significant adverse effects and avoiding, remedying and mitigating other adverse effects of activities on; [...]</i>) will be achieved to give effect to the <i>New Zealand Coastal Policy Statement</i>.</p>	<p>No relief necessary</p> <p>The submitter's comments are noted, however, officers would like to point out that achieving Policies is set out under the methods section. In particular, methods relating to indigenous biodiversity are covered in Method 17 and also more broadly covered within the entire Methods section of the Plan. Further, these issues are covered within the Methods of implementation within the Indigenous biodiversity section of the <i>Regional Policy Statement for Taranaki</i>. Officers believe that this issue is addressed sufficiently within the Plan and also within the <i>Regional Policy Statement</i>.</p>
46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	382	<p>Other</p> <p>Submitter seeks that the Council ensure Policy 14 of the Plan and corresponding rules provide appropriately for the operation, maintenance and upgrade of existing regionally important infrastructure.</p>	<p>No relief necessary</p> <p>Comments noted. Officers note that all the General Policies (and relevant Activity-specific Policies) need to be read together, which includes considering Policies 5 [Use and development] and 6 [Regionally important infrastructure] of the Plan alongside biodiversity considerations set out in Policy 14.</p>
47 – Fonterra	383	<p>Support</p> <p>Retain Policy 14 as notified.</p>	<p>Accept</p> <p>Support noted. Policy 14 is retained subject to amendments made to offer relief to other submitters' concerns where appropriate.</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
58 – Te Atiawa	384	<p>Amend</p> <p>Submitter seeks amendment to Policy 14(a) of the Plan to include a new clause to read:</p> <p><i>Protect areas of significant indigenous biodiversity in the coastal environment and maintain and enhance indigenous biodiversity by:</i></p> <p><i>(a) avoiding adverse effects of activities on [...]</i></p> <p><i><u>(vii) Taonga species as identified by tangata whenua [...]</u></i></p>	<p>Accept in kind</p> <p>The relief sought by the submitter would have the perverse outcome of derogating from the relationship of tangata whenua culture, values and traditions with the coastal environment. Given the importance of some of these species as mahinga kai, their inclusion in Policy 14 (with its strong avoidance direction) would potentially preclude/restrict customary activities (such as harvesting) that has adverse effects on their populations, abundance and distribution.</p> <p>Officers recommend an alternative relief that provides for strong recognition and provision for taonga species. It is recommended that a new Policy 14A be included to ensure activities avoid, remedy or mitigate adverse effects on taonga species. It is further recommended that a definition for taonga species be provided and a new schedule included to identify taonga species.</p> <p>The new Policy 14B would read as follows:</p> <p><i><u>Policy 14B: Taonga species</u></i></p> <p><i><u>Recognise and provide for the maintenance or enhancement of taonga species as identified in Schedule xyz by:</u></i></p> <p><i><u>(a) avoiding significant adverse effects of activities on the habitat of taonga species, mahinga kai, tāiapure or mataitai and customary uses and values unless:</u></i></p> <p><i><u>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; and</u></i></p> <p><i><u>(b) avoiding, remedying or mitigating other adverse effects of activities on taonga species habitat, mahinga kai, tāiapure or mataitai.</u></i></p>
Further submissions – Trans-Tasman Resources Ltd (6)		Oppose	
Further submissions – Te Korowai o Ngāruahine Trust (41)		Support	
58 – Te Atiawa	385	<p>Amend</p> <p>Submitter seeks amendment to Policy 14 of the Plan include a new clause (c) that reads:</p> <p><i>Protect areas of significant indigenous biodiversity in the coastal environment and maintain and enhance indigenous biodiversity by: [...]</i></p> <p><i><u>(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.</u></i></p>	<p>Accept in kind</p> <p>Officers do not recommend granting the relief noting that it relates to a framework setting out tiered protection of indigenous biodiversity rather than identifying particular relationships for implementing the policy. Officers note that the relief proposed only addresses the role of tangata whenua as kaitiaki and is silent on the role of others parties who may also have a significant involvement and/or interest in indigenous biodiversity protection.</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Further submissions – Te Korowai o Ngāruahine Trust (41), Te Rūnanga o Ngāti Ruanui Trust (61)		Support	<p>Rather than making changes to Policy 14, officers recommend an alternative relief that may partially give effect to the submitters wish for the role of tangata whenua as kaitiaki to be recognised. Officers recommend minor amendment to Policy 16 to explicitly recognise for the role of tangata whenua as kaitiaki across all aspects of managing use, development and protection in the coastal environment (rather than just biodiversity). Officers note that all General Policies (and relevant Activity-specific Policies) must be read together.</p> <p>The amendment to Policy 16 would read:</p> <p><i>Recognise and provide for the relationship of tangata whenua culture, values and traditions with the coastal environment, <u>including the role of tangata whenua as kaitiaki</u>, and take into account the principles of the Treaty of Waitangi.</i></p>
60 – Te Kaahui o Rauru	386	<p>Amend</p> <p>Submitter seeks amendment to Policy 14 of the Plan to include native species of value to Māori.</p>	<p>Accept in kind</p> <p>The relief sought by the submitter would have the perverse outcome of derogating from the relationship of tangata whenua culture, values and traditions with the coastal environment. Given the importance of some of these species as mahinga kai, their inclusion in Policy 14 (with its strong avoidance direction) would potentially preclude/restrict customary activities (such as harvesting) that has adverse effects on their populations, abundance and distribution.</p> <p>Officers recommend an alternative relief that provides for strong recognition and provision for taonga species. It is recommended that a new Policy 14B be included to ensure activities avoid, remedy or mitigate adverse effects on taonga species. It is further recommended that a definition for taonga species be provided and a new schedule included to identify taonga species.</p> <p>The new Policy 14B would read as follows:</p> <p><u><i>Policy 14B: Taonga species</i></u></p> <p><u><i>Recognise and provide for the maintenance or enhancement of taonga species as identified in Schedule xyz by:</i></u></p> <p><u><i>(a) avoiding significant adverse effects of activities on the habitat of taonga species, mahinga kai, tāiapure or mataitai and customary uses and values unless:</i></u></p> <p><u><i>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; and</i></u></p>
Further submissions – Te Korowai o Ngāruahine Trust (41), Te Rūnanga o Ngāti Ruanui Trust (61)		Support	<p>Officers recommend an alternative relief that provides for strong recognition and provision for taonga species. It is recommended that a new Policy 14B be included to ensure activities avoid, remedy or mitigate adverse effects on taonga species. It is further recommended that a definition for taonga species be provided and a new schedule included to identify taonga species.</p> <p>The new Policy 14B would read as follows:</p> <p><u><i>Policy 14B: Taonga species</i></u></p> <p><u><i>Recognise and provide for the maintenance or enhancement of taonga species as identified in Schedule xyz by:</i></u></p> <p><u><i>(a) avoiding significant adverse effects of activities on the habitat of taonga species, mahinga kai, tāiapure or mataitai and customary uses and values unless:</i></u></p> <p><u><i>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; and</i></u></p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
			<u><i>(b) avoiding, remedying or mitigating other adverse effects of activities on taonga species habitat, mahinga kai, tāiapure or mataitai.</i></u>
61 – Te Rūnanga o Ngāti Ruanui Trust	387	<p>Amend</p> <p>Submitter seeks amendment to Policy14(a) of the Plan to read: <i>Protect areas of significant indigenous biodiversity in the coastal environment and maintain and enhance indigenous biodiversity by:</i> <i>(a) avoiding adverse effects of activities on [...]</i> <u><i>(iv) taonga species protected under Taranaki iwi Deed of Settlement, as identified in Schedule 4C; [...]</i></u></p>	<p>Accept in kind</p> <p>The relief sought by the submitter would have the perverse outcome of derogating from the relationship of tangata whenua culture, values and traditions with the coastal environment. Given the importance of some of these species as mahinga kai, their inclusion in Policy 14 (with its strong avoidance direction) would potentially preclude/restrict customary activities (such as harvesting) that has adverse effects on their populations, abundance and distribution.</p> <p>Officers recommend an alternative relief that provides for strong recognition and provision for taonga species. It is recommended that a new Policy 14B be included to ensure activities avoid, remedy or mitigate adverse effects on taonga species. It is further recommended that a definition for taonga species be provided and a new schedule included to identify taonga species.</p> <p>The new Policy 14B would read as follows: <u><i>Policy 14B: Taonga species</i></u> <u><i>Recognise and provide for the maintenance or enhancement of taonga species as identified in Schedule xyz by:</i></u> <u><i>(a) avoiding significant adverse effects of activities on the habitat of taonga species, mahinga kai, tāiapure or mataitai and customary uses and values unless:</i></u> <u><i>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; and</i></u> <u><i>(b) avoiding, remedying or mitigating other adverse effects of activities on taonga species habitat, mahinga kai, tāiapure or mataitai.</i></u></p>
Further submissions – Trans-Tasman Resources Ltd (6)		Oppose	
Policy 15 – Historic heritage			
2 – Federated Farmers	388	<p>Amend</p> <p>Submitter seeks that historic heritage sites should be accurately mapped to give certainty and that normal farming activities are recognised as co-existing with heritage values and enabled to continue.</p>	<p>No relief necessary</p> <p>The submitter's comments have been noted. However, officers do not believe any relief is necessary. Historic heritage sites, in or adjoining the coastal marine area, have been mapped where possible. In many cases accurate mapping of historic heritage on the seabed is not possible.</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
20 – Meridian Energy Ltd	389	Amend	Decline
		Submitter seeks amendment to Policy 15 of the Plan to read: <i>Protect historic heritage in the coastal environment from inappropriate <u>subdivision</u>, use and development by: [...]</i>	The submitter wishes to include “ <i>subdivision</i> ” within Policy 15 to be consistent with Policy 15 [Natural features and natural landscapes] of the <i>New Zealand Coastal Policy Statement</i> . While recognising that the <i>New Zealand Coastal Policy Statement</i> refers to subdivision, use and development, Officers note that implementing the <i>New Zealand Coastal Policy Statement</i> is not confined to the Taranaki Regional Council or the Coastal Plan. District councils (and district plans) also have a role and it is the officer’s view that district councils and district plans are best placed to address subdivision. Pursuant to Section 63 of the RMA, the purpose of regional plans is to assist a regional council to carry out its functions in order to achieve the purpose of the RMA. Officers therefore do not consider it appropriate to have policies to manage activities such as subdivision, which clearly falls outside its statutory functions and where implementation of the policy (or otherwise) lies with other parties (i.e. territorial authorities).
40 – Te Rūnanga o Ngāti Mutunga	390	Amend	Decline
		Submitter wishes to see a greater level of protection within Policy 15(b) of the Plan by removing the word “significant” to read: <i>Protect historic heritage in the coastal environment from inappropriate use and development by: [...]</i> <i>(b) avoiding significant adverse effects and avoiding, remedying and mitigating other adverse effects on the [...]</i>	The level of protection that Policy 15(b) provides sites of significance to Māori is considered appropriate by officers. Without including “significant” the Policy would be unnecessarily broad and protect against minor or transitional effects. Policy 15(b) represents a high level of protection but does allow activities that have less than minor adverse effects and/or where the effects maybe transitory. The relief sought by the submitter would also have the perverse outcome of derogating from the relationship of tangata whenua culture, values and traditions with the coastal environment. For example, sites of significance to Māori identified in Schedule 5B of the Plan include a large number of kaimoana sites. Granting the relief sought, where all effects must be avoided, would potentially preclude/restrict customary activities (such as harvesting).
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Support	
41 – Te Korowai o Ngāruahine Trust	391	Amend	Accept in kind
		Submitter seeks amendment to Policy 15(d) of the Plan to specifically recognise the role of kaitiaki and mātauranga supplied by tangata whenua/mana whenua and their experts.	Officers do not recommend granting the relief as proposed by the submitter noting that it largely relates to a framework setting out tiered protection of historic heritage with Policy 15(d) already referring to the outcomes of consultation with relevant

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Further submissions – Te Rūnanga o Ngāti Mutunga (40), Te Atiawa (58), Te Rūnanga o Ngāti Ruanui Trust (61)		Support	bodies or individuals, including local iwi and hapū. Amending the Policy to include an amended Clause, focusing on one organisations or stakeholder group (while remaining silent on other relevant organisations and groups) is not considered appropriate or necessary. Rather than making changes to Policy 15 officers recommend an alternative relief that may partially give effect to the submitters wish for the role of tangata whenua as kaitiaki to be recognised. Officers recommend minor amendment to Policy 16 to explicitly recognise for the role of tangata whenua as kaitiaki across all aspects of managing use, development and protection in the coastal environment (rather than just historic heritage). Officers note that all General Policies (and relevant Activity-specific Policies) must be read together. Officers further recommend other consequential changes to the methods of the Plan that incorporate the concept of mātauranga Māori based methods or cultural indicators into resource consent conditions.
45 – Powerco	392	Support Retain Policy 15 of the Plan as notified.	Accept Support noted. Policy 15 is retained as notified.
46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	393	Support Retain Policy 15 of the Plan as notified.	Accept Support noted. Policy 15 is retained as notified.
Further submissions – Port Taranaki Ltd (32)		Support	
57 – Heritage new Zealand	394	Support Retain Policy 15 of the Plan as notified.	Accept Support noted. Policy 15 is retained as notified.
58 – Te Atiawa	395	Amend Submitter seeks amendment to Policy 15(b) of the Plan to read: <i>Protect historic heritage in the coastal environment from inappropriate use and development by: [...]</i> <i>[...]</i> <i>(b) avoiding significant adverse effects and avoiding, remedying and mitigating other adverse effects on the associated values with sites of significance to Māori identified in Schedules 5A.</i>	Decline The relief sought would potentially restrict all activities in or near Māori sites of significant, even if such activities would only have minor or transitional effects. See above response to Te Rūnanga o Ngāti Mutunga for additional details and considerations.

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Support	
58 – Te Atiawa	396	<p>Amend</p> <p>Submitter seeks amendment to Policy 15(d) of the Plan to include a new Clause (x) that reads:</p> <p><i>Protect historic heritage in the coastal environment from inappropriate use and development by:</i></p> <p>[...]</p> <p><i>(d) when assessing adverse effects on historic heritage, giving regard to the extent of effects, including consideration of:</i></p> <p>[...]</p> <p><i>(x) evidence supplied by tangata whenua including that of kaumatua and pukenga.</i></p>	<p>No relief necessary</p> <p>The policies section of the Plan does not give directions or set out the appropriate way to gather data, this is more appropriately addressed within the Methods section of the Plan. Method 25 covers iwi involvement with the development of resource investigations and projects, including developing iwi and Council databases and records that identify sites and places of special cultural and traditional value which will also include considerations of the effects and extents of adverse effects.</p> <p>Officers note that Clauses 15(d)(viii) and (ix) already refer to assessments of adverse effects on historic heritage taking into consideration any investigations and documentation of the site, which would include the outcome of consultation with iwi and hapū evidence supplied by kaumatua and pukenga. Amending the Policy to include a new Clause, focusing on one potential source of information, is not considered appropriate or necessary.</p>
Further submissions – Te Korowai o Ngāruahine Trust (41)		Support	
61 – Te Rūnanga o Ngāti Ruanui Trust	397	<p>Amend</p> <p>Submitter seeks amendment to Policy 15 of the Plan to read:</p> <p><i>Policy 15: <u>Cultural and</u> Historic heritage</i></p> <p><i>Protect <u>cultural and</u> historic heritage in the coastal environment from inappropriate use and development by:</i></p> <p><i>(a) avoiding adverse effects on the values associated with Category A archaeological sites of significance and <u>cultural and</u> historic areas identified in Schedule 5A <u>and GIS map layer #</u>;</i></p> <p><i>(b) avoiding significant adverse effects, and avoiding, remedying and mitigating other adverse effects on the values associated with <u>cultural heritage</u> sites of significance to Māori identified in Schedules 5A and 5B <u>and GIS map layer #</u>;</i></p> <p><i>(c) avoiding, remedying or mitigating adverse effects on the values associated with all other <u>cultural and</u> historic heritage sites, including those identified in Schedule 5 <u>and GIS map layer #</u> and those identified by New Zealand Archaeological Association's ArchSite (Archaeological Site Recording Scheme) <u>and tangata whenua</u>;</i></p>	<p>Decline</p> <p>Officers do not consider it necessary or appropriate to include reference to “cultural” alongside “Historic heritage”. Historic heritage has a broad definition under Section 2 of the RMA and includes reference to cultural qualities as well as sites of significance to Māori. Section 2 definition of “historic heritage” reads as follows:</p> <p>“...historic heritage means:</p> <p><i>(a) those natural and physical resources that contribute to an understanding and appreciation of New Zealand's history and cultures, deriving from any of the following qualities:</i></p> <p><i>(i) archaeological,</i></p> <p><i>(ii) architectural,</i></p> <p><i>(iii) cultural,</i></p> <p><i>(iv) historic,</i></p> <p><i>(v) scientific,</i></p> <p><i>(vi) technological, and</i></p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		<p>(d) when assessing adverse effects on <u>cultural and</u> historic heritage, giving regard to the extent of effects, including consideration of:</p> <p>i. the association of the site with other interrelated, but not necessarily contiguous, cultural and historic heritage sites and their collective significance in the context of historic landscapes and areas;</p> <p>ii. the degree to which <u>cultural and</u> historic heritage values will be lost, damaged, destroyed, or enhanced;</p> <p>iii. the nature, location, extent, design and appearance of the proposed development and the effects of these factors on <u>cultural and</u> historic heritage values;</p> <p><u>iv. the location of the proposed development in terms of the Cultural Zone (buffer zone between the proposed development and the cultural and historic heritage sites) identified on GIS map layer # and the effects of its location on cultural heritage values;</u></p> <p>v. the classification given to the <u>cultural and</u> historic heritage, as set out in Schedule 5A and the reasons for which it has been scheduled;</p> <p>vi. the extent to which the <u>cultural and</u> historic heritage has been damaged by natural events, weather, or environmental factors and any subsequent risk to public safety;</p> <p><u>vii. spatial planning considerations which involves (but not limited to) neighbouring rural nature, landscape, cultural history values and development-related interests; identification of conflicting activities that would impact on mana whenua issues, areas of interest and cultural significance;</u></p> <p>viii the importance (if any) of land surrounding the <u>cultural and</u> historic heritage;</p> <p>ix. the degree of compliance with Heritage New Zealand's Pohere Taonga Archaeological requirements;</p> <p>x. any investigation and documentation of the site to provide a historical record; and</p> <p>xi. the outcome of any consultation <u>including written approvals</u> with any relevant body or individual, such as Heritage New Zealand Pohere Taonga, the Department of Conservation, or local iwi and/or hapū; [...]</p>	<p>(b) includes—</p> <p>(i) historic sites, structures, places, and areas; and</p> <p>(ii) archaeological sites, and</p> <p>(iii) sites of significance to Māori, including wāhi tapu, and</p> <p>(iv) surroundings associated with the natural and physical resources.”</p> <p>Officers also have concerns that these and other amendments would reduce certainty in the application of Plan provisions including rules. It is currently quite clear what is meant by the term historic heritage and that it includes sites of significance to Māori and cultural aspects. That is not the case with the term “cultural heritage”, which potentially has a much broader meaning in the context of this policy.</p> <p>Other suggested changes by the submitter include referencing the GIS map layer. This was considered unnecessary as the schedule includes all appropriate map links and referencing tangata whenua in Policy 15 (c) was considered unnecessary as such matters are more appropriately addressed in (b) which provides a higher level of protection.</p> <p>The submitter also sought reliefs that rely on a cultural zone. The submitter does not identify how or what would be considered a cultural zone or how such zones.</p>
Further submissions – Trans-Tasman Resources Ltd (6)		Oppose (cultural zone)	

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Further submissions – Te Korowai o Ngāruahine Trust (41)		Support	
Further submissions – Te Atiawa (58)		Oppose	
Policy 16 – Relationship of tangata whenua			
6 – Trans-Tasman Resources Ltd	398	<p>Amend</p> <p>Submitter seeks amendment to Policy 16(i) and (j) of the Plan to read:</p> <p><i>Recognise and provide for the relationship of tangata 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 for tangata whenua to actively participate in the resource management process where decisions are being made on issues of significance to tangata whenua by:</i></p> <p>[...]</p> <p><i>(i) requiring that resource consent applications or plan change applications assess provide cultural <u>and/or historic heritage/archaeological</u> impacts assessments and/or archaeological assessments where <u>relevant appropriate</u>; and</i></p> <p><i>(j) involving taking into account any views of tangata whenua in the development of on any relevant proposed consent conditions, compliance monitoring plans and/or enforcement procedures <u>where appropriate</u>.</i></p>	<p>Decline</p> <p>Officers recommend declining the relief sought by the submitter.</p> <p>In relation to amending Clause (i) officers suggest that the current wording is appropriate in that it notes that cultural impact assessments will be provided where appropriate. What is appropriate will depend upon individual circumstances and the wider context. Such matters are routinely canvassed and effectively addressed as part of any consenting process. Officers note that the Policy does not require cultural impact assessments to be provided in all circumstances (which is the matter of concern to the submitter). The suggested amendments to Policy 16(1), as supplied by the submitter, were not considered appropriate as it is not the duty of the applicant to assess – only tangata whenua can do this and the policy is about tangata whenua rather than wider historic heritage matter.</p> <p>Similarly, in relation to amending Clause (j) officers note that the Policy is seeking to involve tangata whenua in resource management processes where it is appropriate. Providing tangata whenua with opportunities to actively participate in resource management processes requires more than this Council just taking into account their views. Again officers suggest that the current wording is appropriate in that it requires tangata whenua involvement where appropriate.</p>
Further submissions – Federated Farmers (2)		Support in part	
Further submissions – Te Rūnanga o Ngāti Mutunga (40), Te Korowai o Ngāruahine Trust (41), Te Atiawa (58), Te Rūnanga o Ngāti Ruanui Trust (61)		Oppose	
15 – Surfbreak Protection Society	399	<p>Support</p> <p>Retain Policy 16 of the Plan as notified.</p>	<p>Accept</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Further submissions – Port Taranaki Ltd (32)		Support	Support noted. Policy 16 is retained subject to amendments made to offer relief to other submitters' concerns where appropriate.
19 – South Taranaki District Council	400	Support Retain Policy 16 of the Plan as notified.	Accept in part Support noted. Policy 16 is retained subject to amendments made to offer relief to other submitters' concerns where appropriate.
40 – Te Rūnanga o Ngāti Mutunga	401	Amend Submitter seeks amendment to Policy 16 of the Plan to read: <i>Recognise and provide for the relationship of tangata 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 for tangata whenua to actively participate in the resource management process where decisions are being made on issues of significance to tangata whenua by:</i> <i>(a) taking into account any relevant iwi planning documents <u>and consider providing practical assistance to iwi or hapū who have indicated a wish to develop iwi/hapū resource management plans:</u></i> [...] <i>(k) the Council ensures the active involvement of the appropriate iwi/hapū in management of the coastal environment when activities may affect their interests and values;</i> <i>(l) provide for opportunities for iwi/hapū to exercise kaitiakitanga over waters, forest, lands and fisheries in the coastal environment through such measures as:</i> <i>(i) bringing cultural understanding to monitoring of natural resources</i> <i>(ii) providing appropriate methods for the management, maintenance and protecting of the Taonga of tangata whenua</i> <i>(iii) having regards to regulations, rules or bylaws relating to ensuring sustainability of fishing resources such as taiapure, mahinga mataitai or other non-commercial Māori customary fishing</i> <i>(m) where proposals are likely to have an adverse effect on the mauri of the coastal environment, the Council shall consider imposition of consent conditions that incorporate the use of mātauranga Māori based methods or cultural indicators that recognise and express Māori values to monitor the effects of the</i>	Accept in part The submitter seeks a number of amendments to Policy 16 relating to iwi/hapū involvement in the resource management process. Officers note that many of the requests are actually methods and are already provided for in other, more appropriate, areas of the Plan and do not require repeating within this Policy. For example, the relief sought in (a) is a method that is already provided for in Section 5 [Methods of implementation] of the Plan, and more specifically Methods 22 and 26, which refers to the Council actively supporting and assisting in surveys, research and investigations and technical advice and support for preparing iwi planning documents. Notwithstanding the above, officers recommend amending Policy 16 to further strengthen tangata whenua involvement in RMA processes under the Plan, including a new Clause (k) (plus other consequential changes sought by other submitters) that reads as follows: <i>Recognise and provide for the relationship of tangata whenua culture, values and traditions with the coastal environment, <u>including the role of tangata whenua as kaitiaki,</u> and take into account the principles of the Treaty of Waitangi, and kaitiakitanga.</i> <i>The Taranaki Regional Council will provide opportunities for <u>working in partnership with</u> tangata whenua to actively participate in the resource management process where decisions are being made on issues of significance to tangata whenua by:</i> [...] <i>(k) considering consent conditions that incorporate the use of mātauranga Māori based methods or cultural indicators that recognise and express Māori values to monitor the effects of the activity on the mauri of the natural and physical resources of the coastal environment.</i>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		<u>activity on the mauri of the natural and physical resources of the coastal environment.</u>	Officers further recommend amending the Plan to include a new Policy and Schedule addressing the protection of taonga species plus amendments to implementation Methods.
Further submissions – Te Korowai o Ngāruahine Trust (41), Te Atiawa (58), Te Rūnanga o Ngāti Ruanui Trust (61)		Support	
41 – Te Korowai o Ngāruahine Trust	402	<p>Amend</p> <p>Submitter supports the inclusion of Policy 16 of the Plan but seeks amendments to read:</p> <p><i>Recognise and provide for the relationship of tangata 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 for tangata whenua to actively participate in the resource management process where decisions are being made on issues of significance to tangata whenua by:</i></p> <p><i>(a) taking into account any relevant iwi planning documents, <u>including but not limited to Environmental Plans, Management Plans, Kaitiaki Plans and Marine Spatial Plans</u>;</i></p> <p>[...]</p> <p><i>(d) responding to requests for taking into account Mana Whakahono a Rohe that provide agreements about how to enhance the opportunities for collaboration with iwi may contribute to resource management practices;</i></p> <p>[...]</p> <p><i>(g) providing for the appointment of a person(s)...</i></p> <p><i>(h) providing for the inclusion of and recognising the importance of mātauranga [...]</i></p> <p><i>(i) requiring that resource consent applications or plan change applications provide cultural impact assessment and/or archaeological assessments where deemed appropriate and/or necessary by iwi;</i></p> <p>[...]</p> <p><i>(k) providing for and responding to the considerations of tino rangatiratanga, kaitiakitanga, tikanga, customary values and practices, wāhi tapu and taonga tapu species in matters of significance and relevance to tangata whenua;</i></p>	<p>Accept in part</p> <p>The submitter seeks a number of amendments to Policy 16 relating to iwi/hapū involvement in the resource management process.</p> <p>Officers agree to most of the requests sought in relation to Policy 16, with rewording to provide internal consistency with other areas of the Plan, to further strengthen tangata whenua involvement in RMA processes under the Plan. Officers further recommend amending the Plan to include a new Policy and Schedule addressing the protection of taonga species plus amendments to implementation Methods.</p> <p>The revised Policy 16 would read as follows:</p> <p><i>Recognise and provide for the relationship of tangata whenua culture, values and traditions with the coastal environment, <u>including the role of tangata whenua as kaitiaki</u>, and take into account the principles of the Treaty of Waitangi, and kaitiakitanga.</i></p> <p><i>The Taranaki Regional Council will provide opportunities for <u>working in partnership with</u> tangata whenua to actively participate in the resource management process where decisions are being made on issues of significance to tangata whenua by:</i></p> <p><i>(a) taking into account any relevant iwi planning document, <u>including but not limited to environmental plans, management plans, kaitiaki plans and marine spatial plans recognised by an iwi authority</u>;</i></p> <p><i>(b) taking into account any relevant memorandum of understanding or kaitiaki agreement with <u>between the Taranaki Regional Council and the iwi authorities</u>;</i></p> <p><i>(c) implementing the relevant legal requirements of Treaty settlements, including representation on Council committees; and taking into account other aspects of Treaty settlements including, statements of association, protection principles and statutory acknowledgements;</i></p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		<p>(l) <i>development of cultural monitoring practices and expertise;</i> (m) <i>actively protecting sites of significance, wāhi tapu and taonga tapu.</i></p>	<p>(d) <i>responding to requests for give effect to Mana Whakahono a Rohe to enhance the opportunities for collaboration with that provide agreements about how iwi may contribute to resource management processes;</i></p>
Further submissions – Trans-Tasman Resources Ltd (6)		Oppose (Clause (i))	<p>(e) providing for tikanga Māori and interpretation services for the use of Māori language in presenting evidence;</p>
Further submissions – Te Atiawa (58), Te Rūnanga o Ngāti Ruanui Trust (61)		Support	<p>(f) providing for marae-based pre-hearing meetings and hearings where appropriate;</p> <p>(g) providing for the appointment of a person(s) with recognised expertise in tikanga Māori to any hearing committee where a resource consent application raises significant issues for tangata whenua;</p> <p>(h) recognising the importance of mātauranga Māori, customary, traditional and intergenerational knowledge;</p> <p>(i) requiring that resource consent applications or plan change applications provide assess cultural and/or historic heritage impacts assessments and/or archaeological assessments where appropriate relevant; and</p> <p>(j) involving taking into account any views of tangata whenua in the development of on any relevant proposed consent conditions, compliance monitoring plans and/or enforcement procedures where appropriate; and</p> <p>(k) considering consent conditions that incorporate the use of mātauranga Māori based methods or cultural indicators that recognise and express Māori values to monitor the effects of the activity on the mauri of the natural and physical resources of the coastal environment.</p>
48 – Taranaki District Health Board	403	<p>Amend</p> <p>The submitter would like to enhance the partnership with tangata whenua whilst acknowledging holistic views of the environment. Submitter seeks amendments to Policy 16 of the Plan to read:</p> <p><i>Recognise and provide for the relationship of tangata 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 for working in partnership with tangata whenua to actively participate in the resource management process where decisions are being made on issues of significance to tangata whenua by:</i></p> <p>(a) <i>encouraging taking into account the use of relevant iwi planning document [...]</i></p>	<p>Accept in part</p> <p>Officers agree that Policy 16 would be enhanced by including “working in partnership with tangata whenua” and accept this request. However, it is not the role of the Council to encourage the use of iwi planning documents as this is a different action than taking into account. Given the context, it is more appropriate, and a stronger directive, to “take into account”. Thus, officers decline the requested amendment for “encouraging” to replace “taking into account”.</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Oppose	
57 – Heritage New Zealand	404	<p>Amend</p> <p>Submitter seeks amendment to Policy 16(b) of the Plan to read: <i>(b) Taking into account any relevant memorandum of understanding <u>or kaitiaki agreement with between the Taranaki Regional Council and the iwi authorities</u>;</i> OR Alternatively, amend Policy 13(a)(ii) to reference kaitiaki agreements.</p>	<p>Accept</p> <p>The submitter wishes to amend Policy 16(b) to include reference to kaitiakitanga agreements. Officers recommend granting the relief sought by stating that the Council will take into account any kaitiakitanga agreements alongside any memorandum of understanding agreements between iwi and the Council.</p>
Further submissions – Te Korowai o Ngāruahine Trust (41), Te Atiawa (58)		Support	
58 – Te Atiawa	405	<p>Amend</p> <p>The submitter wishes to adapt the wording of Policy 16 to better reflect their view on the Council's legal obligation to consult and involve Māori in decision making. The submitter seeks amendment to Policy 16 of the Plan to read: <i>Recognise and provide for the relationship of tangata whenua cultural, 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 for tangata whenua to actively participate in the resource management process, <u>including decision-making</u>, where decisions are being made on issues of significance to tangata whenua by:</i></p>	<p>Decline</p> <p>Officers decline the relief sought on the basis that they believe the Plan provisions do give effect to Council's statutory obligations to consult and involve Māori in resource management. Officers note that active participation in resource management is not necessarily the same thing as decision-making. Clauses (a) to (k) provide a suite of mechanisms for providing and enhancing tangata whenua involvement in RMA processes. Some of them such as (g) [Māori representation on Council committees] have a decision making component. However, most relate to mechanisms for enabling or promoting tangata whenua involvement and input into different planning, consenting and implementation processes. Ultimately, Council is responsible under the RMA for local decision relating on its section 30 RMA functions.</p>
Further submissions – Te Korowai o Ngāruahine Trust (41), Te Rūnanga o Ngāti Ruanui Trust (61)		Support	
58 – Te Atiawa	406	<p>Amend</p> <p>Submitter seeks amendment to Policy 16(a) of the Plan to read: <i>(a) taking into account any relevant iwi planning documents <u>and consider providing practical assistance to iwi or hapū who have indicated a wish to develop iwi/hapū resource management plans. [...]</u></i></p>	<p>No relief necessary</p> <p>Officers note that the submitters request is actually a method which is already provided for in other, more appropriate, areas of the Plan and does not require repeating within this Policy. Officers note that the requested amendment is already covered in Implementation Methods 24, 25, 26 and 28. It is not necessary to repeat these provisions within the</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Further submissions – Te Korowai o Ngāruahine Trust (41)		Support	Policies section and so the request is denied on the basis that it will not provide any further function than is already provided for within the Methods.
58 – Te Atiawa	407	<p>Amend</p> <p>Submitter seeks amendment to Policy 16 of the Plan by adding a new Clause (k) and (l) to read:</p> <p><i><u>(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;</u></i></p> <p><i><u>(l) provide for opportunities for tangata whenua to exercise kaitiakitanga over waters and fisheries in the coastal environment through such measures as:</u></i></p> <p><i><u>(i) bringing cultural understanding to monitoring of natural resources; and</u></i></p> <p><i><u>(ii) providing appropriate methods for the management, maintenance and protection of the taonga and tangata whenua; and</u></i></p> <p><i><u>(iii) having regards to regulations, rules or bylaws relating to ensuring sustainability of fishing resources such as taiapure, mahinga mataitai or other non-commercial Māori customary fishing.</u></i></p>	<p>Accept in part</p> <p>The submitter wishes to broaden Policy 16 to address unforeseen adverse effects on sights of significance to Māori with the inclusion of a new clause (k) and provide for the role of tangata whenua as kaitiaki with the inclusion of a new clause (l).</p> <p>Officers note that many of the requests are already provided for in other, more appropriate, areas of the Plan so do not require repeating within this Policy. For example, protection of sites of significance to Māori, is already fully addressed within Policy 15 [Historic heritage]. Other suggested amendments are actually methods. Rather than restating matters covered in other policies or restating methods as policies, Officers recommend alternative reliefs to better recognise and provide for tangata whenua values. The reliefs include the inclusion of a new Policy 14B (and associated Schedule) that includes avoiding, remedying or mitigating adverse effects on taonga species habitat, mahinga kai, tāiapure or mataitai and the inclusion of a new Clause, reframed to align with relief sought by other submitters, to read:</p> <p><i><u>(k) considering consent conditions that incorporate the use of mātauranga Māori based methods or cultural indicators that recognise and express Māori values to monitor the effects of the activity on the mauri of the natural and physical resources of the coastal environment.</u></i></p>
Further submissions – Trans-Tasman Resources Ltd (6)		Oppose (Clause (k))	
Further submissions – Te Korowai o Ngāruahine Trust (41)		Support	
60 - Te Kaahui o Rauru	408	<p>Amend</p> <p>Submitter seeks amendment to Policy 16(g) of the Plan to include the right of local iwi/hapū to choose said person of expertise, as long as there has been no illustrated conflict of interest.</p>	<p>Decline</p> <p>Policy 16 (g) allows a person of tikanga Māori expertise the ability to be heard in any hearing committee if a resource consent application raises significant issues for tangata whenua. The issue raised regarding who is considered an appropriate expert to present at these hearings is an operational detail rather than a policy issue that would be more appropriately addressed in a Mana Whakahono a Rohe agreement between iwi and the Council or as part of a consenting process.</p>
Further submissions – Te Korowai o Ngāruahine Trust (41), Te Atiawa (58)		Support	
60 - Te Kaahui o Rauru	409	<p>Amend</p> <p>Submitter seeks amendment to Policy 16(h) of the Plan to read:</p>	<p>Accept in kind</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		(h) recognising <u>and providing for</u> the importance of matauranga maaori, customary, traditional and intergenerational knowledge [...]	Officers agree to the request to recognise and provide for mātauranga Māori. Officers further note, in response to other submitter requests, the inclusion of a new clause that further strengthens consideration of mātauranga Māori that reads:
Further submissions – Te Korowai o Ngāruahine Trust (41), Te Atiawa (58)		Support	<u>(k) considering consent conditions that incorporate the use of mātauranga Māori based methods or cultural indicators that recognise and express Māori values to monitor the effects of the activity on the mauri of the natural and physical resources of the coastal environment.</u>
61 – Te Rūnanga o Ngāti Ruanui Trust	410	<p>Amend</p> <p>Submitter seeks amendment to Policy 16 of the Plan to clearly articulate tangata whenua participation and to list existing formal relationships between tangata whenua and councils (include reference to any 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> <p>The recommended amendments to Policy 16 read as follows:</p> <p><i>Recognise and provide for the relationship of tangata 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 ensure the active participation of tangata whenua to actively participate in the resource management process where decisions are being made on issues of significance to tangata whenua by:</i></p> <p>[...]</p> <p><i>(c) implementing the relevant legal requirements of Treaty settlements, including representation on Council committees; and have regard to taking into account other aspects of Treaty settlements including, statements of association, protection principles and statutory acknowledgements;</i></p> <p><i>(d) responding to requests for Mana Whakahono a Rohe to enhance the opportunities for collaboration with iwi provide for Mana Whakahono a Rohe, Transfer of Powers under section 33 of the RMA, Memoranda of Understanding, co-management agreements, specific consultation processes including details of agreement as determined in consultation with tangata whenua to enhance the opportunities for collaboration with iwi;</i></p>	<p>Accept in part</p> <p>Officers note consequential changes to Policy 16 that accept in part the relief sought by submitter.</p> <p>Officers do not believe it is appropriate or necessary to list formal agreements and consultative processes with iwi in a Policy. Such matters are operational detail rather than Policy considerations and are already recognised and provided for in the Plan methods of Implementation. For example, Method 11 already refers to the consideration of section 33 transfer of powers, Method 30 refers to memoranda of understandings, and Method 31 refers to tangata whenua representation on Council's standing committees. The methods are deliberately high level. Specifying or listing particular agreements would inevitably lead to details in the Plan becoming out dated as new or amended agreements are reached and recognising iwi interest in developing and reaching agreement on Mana a Whakahono a Rohe agreement.</p> <p>Notwithstanding the above, amendments are proposed in Policy 16 to accommodate some of the amendments sought by this and other submitters. The changes proposed will strengthen mechanisms for recognising and providing for tangata whenua involvement in RMA processes under the Plan.</p> <p>The revised Policy would read as follows:</p> <p><i>Recognise and provide for the relationship of tangata whenua culture, values and traditions with the coastal environment, <u>including the role of tangata whenua as kaitiaki</u>, and take into account the principles of the Treaty of Waitangi, and kaitiakitanga.</i></p> <p><i>The Taranaki Regional Council will provide opportunities for <u>working in partnership with</u> tangata whenua to actively participate in the resource management process where decisions are being made on issues of significance to tangata whenua by:</i></p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		<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>(j) <u>recognise the matters/values identified and proposed for protection by mana whenua in the cultural impact assessment</u>; [...]</p>	<p>(a) taking into account any relevant iwi planning document, <u>including but not limited to environmental plans, management plans, kaitiaki plans and marine spatial plans recognised by an iwi authority</u>;</p> <p>(b) taking into account any relevant memorandum of understanding <u>or kaitiaki agreement with between the Taranaki Regional Council and the iwi authorities</u>;</p> <p>(c) implementing the relevant legal requirements of Treaty settlements, including representation on Council committees; and taking into account other aspects of Treaty settlements including, statements of association, protection principles and statutory acknowledgements;</p> <p>(d) <u>responding to requests for give effect to Mana Whakahono a Rohe to enhance the opportunities for collaboration with that provide agreements about how iwi may contribute to resource management processes</u>;</p> <p>(e) providing for tikanga Māori and interpretation services for the use of Māori language in presenting evidence;</p> <p>(f) providing for marae-based pre-hearing meetings and hearings where appropriate;</p> <p>(g) providing for the appointment of a person(s) with recognised expertise in tikanga Māori to any hearing committee where a resource consent application raises significant issues for tangata whenua;</p> <p>(h) recognising the importance of mātauranga Māori, customary, traditional and intergenerational knowledge;</p> <p>(i) requiring that resource consent applications or plan change applications <u>provide assess</u> cultural <u>and/or historic heritage impacts assessments and/or archaeological assessments</u> where <u>appropriate relevant</u>; and</p> <p>(j) <u>involving taking into account any views of tangata whenua in the development of on any relevant proposed</u> consent conditions, compliance monitoring plans and/or enforcement procedures <u>where appropriate</u>; and</p> <p>(k) <u>considering consent conditions that incorporate the use of mātauranga Māori based methods or cultural indicators that recognise and express Māori values to monitor the effects of the activity on the mauri of the natural and physical resources of the coastal environment</u>.</p>
Further submissions – Trans-Tasman Resources Ltd (6)		Oppose	
Further submissions – Te Korowai o Ngāruahine Trust (41), Te Atiawa (58)		Support	
NEW Policy 16A – Relationship of tangata whenua			
28 – Grant Knuckey	411	Amend	Accept in part

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		<p>Submitter seeks amendment to the Plan to include policies for the Taranaki Regional Council to partner with mana whenua to maintain and enhance coastal values in the coastal marine area, including the establishment of ecological bottom lines or agreed targets for maintaining the natural character, biodiversity and cultural resources of the coastal marine area and whenua.</p>	<p>No precise details of amendments sought to the Plan have been provided but appears to be seeking the inclusion of additional policies. However, officers note that in response to a number of submitters, consequential amendments have been made to Policy 16 that may partially give effect to the relief sought by the submitter.</p> <p>The submitter also refers to the setting of ecological bottom lines or agreed targets for maintaining the natural character, biodiversity and cultural resources of the coastal marine area and whenua. Officers note that all General Policies (and relevant Activity-specific Policies must be read together). These policies already address values associated with natural character, indigenous biodiversity, and historic heritage, which includes sites of significance to Māori. In response to submissions, officers further propose amending the Plan to include a new Policy 14A and B that addresses the protection of biodiversity generally plus taonga species.</p>
Policy 17 – Public access			
2 – Federated Farmers	412	<p>Amend</p> <p>Submitter seeks that Policy 17 of the Plan be amended to read:</p> <p><i>Maintain and <u>as far as practical</u> enhance <u>where a demand exists</u>, public access to, along and adjacent to the coastal environment <u>marine area</u>, <u>while minimising conflict with other land users</u> by:</i></p> <p>(a) avoiding, remedying or mitigating any adverse effects of activities on public access;</p> <p>(b) <i>promoting the enhancement or restoration of public access including for the connection of areas of public open space, access to mahinga kai, access to sites of historical and/or cultural importance, improving outdoor recreation opportunities, access to surf breaks and providing access for people with disabilities; and</i></p> <p>(c) only <i>imposing a restriction on public access, including vehicles, where such a restriction is necessary to:</i></p> <p>(i) <i>protect significant natural or historic heritage values;</i></p> <p>(ii) <i>protect dunes, estuaries and other sensitive natural areas or habitats;</i></p> <p>(iii) <i>protect sites and activities of cultural value to Māori;</i></p>	<p>Accept in part</p> <p>Officers agree in part to the relief sought by the submitter.</p> <p>In particular, Officers agree that Policy 17 be aligned with Policy 19(2) of the <i>New Zealand Coastal Policy Statement</i> which refers to the “coastal marine area” (rather than coastal environment). The amendments do not change the policy intent of the Policy as it still quite clearly applies to the landward parts of the coastal environment adjacent to the coastal marine area.</p> <p>However, the submitter has also sought other changes to address their concerns on conflict between coastal public access and private ownership. Some of these changes were considered unnecessary in that public access over private land is subject to other legislation, are already adequately addressed within the Policy, and/or are not decision making considerations. However, other changes in response to this (and other submitters) proposed to the policy includes amending Clause (ix) to reads as follows:</p> <p><i><u>Recognise and provide for the maintenance and enhancement of</u> public access to, along and adjacent to the coastal <u>marine area</u> by: [...]</i></p> <p>(c) only <i>imposing a restriction on public access, including vehicles, where such a restriction is necessary to: [...]</i></p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		<p>(iv) protect threatened or at risk indigenous species and rare and uncommon ecosystem types as identified in Schedule 4A;</p> <p>(v) protect public health or safety, including where the safety of other coastal or beach users is threatened by inappropriate use of vehicles on beaches and vessels offshore;</p> <p>(vi) provide for defence purposes in accordance with the Defence Act 1990 or port or airport purposes;</p> <p>(vii) avoid or reduce conflict between public uses of the coastal marine area and its margins;</p> <p>(viii) provide for temporary activities or special events;</p> <p>(ix) ensure a level of security consistent with the activity, including protection of equipment; or</p> <p><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></p> <p><u>(xi) where the coastal marine area is in private ownership; or</u></p> <p>(xii) provide for other exceptional circumstances where restriction to public access is justifiable;</p> <p>and alternative access routes for the public have been considered and provided where practicable.</p> <p><u>Public access over private land remains at the discretion of the landowner.</u></p>	<p>(ix) ensure a level of security <u>for lawfully established activities</u> consistent with the activity, including protection of equipment; [...]</p>
Further submissions – Te Korowai o Ngāruahine Trust (41), Te Atiawa (58), Te Rūnanga o Ngāti Ruanui Trust (61)		Oppose	
Further submissions – Taranaki Energy Watch (51)		Oppose in part	
5 – Point Board Riders	413	<p>Support</p> <p>Submitter supports policy promoting the enhancement or restoration of public access in the circumstances listed in Policy 17(b) of the Plan.</p>	<p>Accept</p> <p>Support noted. Policy 17(b) is retained subject to amendments made to offer relief to other submitters' concerns where appropriate.</p>
	414	<p>Support</p>	<p>Accept</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
6 – Trans-Tasman Resources Ltd		Submitter supports recognition in Policy 17(c)(vii) and (ix) of the Plan that in some circumstances there may be a need to restrict access to parts of the coastal environment.	Support noted. Policy 17(c)(viii) and (ix) are retained subject to amendments made to offer relief to other submitters' concerns where appropriate.
15 – Surfbreak Protection Society	415	Support	Accept
		Submitter supports policy promoting the enhancement or restoration of public access in the circumstances listed in Policy 17(b) of the Plan.	Support noted. Support noted. Policy 17(b) is retained subject to amendments made to offer relief to other submitters concerns where appropriate.
20 – Meridian Energy Ltd	416	Amend	Accept
		Submitter seeks amendment to Policy 17 of the Plan to read: <i>Maintain and enhance public access to, along and adjacent to the coastal environment marine area by: [...]</i>	Officers agree to the relief sought by the submitter.
20 – Meridian Energy Ltd	417	Amend	Decline
		Submitter seeks amendment to Policy 17(c)(vii) of the Plan to clarify what sort of conflict it seeks to avoid or reduce between public uses of the coastal marine area and its margins. It is their view that the intention of the clause has not been clarified sufficiently.	No precise details of amendments sought to the Policy 17(c)(vii) to address the submitter's concerns have been provided. However, officers note that the Oxford Dictionary defines "conflict" as a serious disagreement or argument, typically a protracted one. What constitutes a conflict is likely to be determined on a case by case basis and depends upon a wider context. Officers therefore do not believe it is necessary to specify or list what constitutes conflict in the Policy and indeed there would be risks in doing so. Any referencing of specific conflicts is unlikely to cover all situations and circumstances. Potentially some conflicts could be unnecessarily identified and others not listed. Of note, the language is consistent with Policy 19(3)(f) of the <i>New Zealand Coastal Policy Statement</i> .
22 – Lyndon DeVantier	418	Amend	Decline
		Submitter support aspirations in Policy 17 of the Plan but opposed to Policy 17(c)(viii) providing for restrictions on public access necessary to provide for temporary activities or special events.	Of note, the language in Policy 17(c)(viii) of the Plan is consistent with Policy 19(3)(f) of the <i>New Zealand Coastal Policy Statement</i> , which the Council must give effects to.
33 - New Zealand Defence Force	419	Support	Accept
		Retain Policy 17 of the Plan as notified, particularly clause (c)(vi).	Support noted. Policy 17(c)(vi) is retained as currently notified.
	420	Support	Accept

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
35 – Radio New Zealand Ltd		Retain Policy 17 of the Plan as notified.	Support noted. Policy 17 is retained subject to amendments made to offer relief to other submitters' concerns where appropriate.
40 – Te Rūnanga o Ngāti Mutunga	421	Amend	Accept
		Submitter does not support the promotion of public access to all of the iwi's sites of significance as detailed in Schedule 5B and requests to amend Policy 17(b) of the Plan to read: <i>Maintain and enhance public access to, along and adjacent to the coastal environment-by:</i> [...] <i>(b) promoting the enhancement or restoration of public access including for the connection of public open space, access to mahinga kai, access to sites of historical and/or cultural importance improving outdoor recreation [...]</i>	Officers agree that it may be inappropriate and unnecessary to promote public access to sites of significance to Māori and agree to remove the requested section from Policy 17(b) as requested by the submitter.
41 – Te Korowai o Ngāruahine Trust	422	Amend	Accept
		Submitter notes concerns regarding public access to sites of significance to Māori and seeks amendment to Policy 17 of the Plan 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.	Officers agree and recommend amending Policy 17(b) to remove reference to mahinga kai and sites of historical and/or cultural importance. In line with relief requested by this and other submitters, Policy 17(b) would read as follows: <i>(b) promoting the enhancement or restoration of public access including for the connection of public open space, access to mahinga kai, access to sites of historical and/or cultural importance improving outdoor recreation [...]</i>
Further submissions – Te Rūnanga o Ngāti Mutunga (40), Te Atiawa (58), Te Rūnanga o Ngāti Ruanui Trust (61)		Support	The other concerns addressed by the submitter are already recognised and provided for in Policy 18(c), which identifies instances for which public access may be restricted. Clause (c)(i) identifies significant natural or historic heritage values, (iii) identifies sites and activities of cultural value to Māori, and (iv) identifies indigenous species and eco system types identified in Schedule 4A.
42 – Ngati Hine Hapu of Te Atiawa	423	Amend	Accept
		Submitter notes concerns regarding public access to sites of significance to Māori and seeks amendment to Policy 17(b) of the Plan to protect cultural sites from public access.	Officers agree and recommend amending Policy 17(b) to remove reference to mahinga kai and sites of historical and/or cultural importance. In line with relief requested by this and other submitters, Policy 17(b) would read as follows: <i>(b) promoting the enhancement or restoration of public access including for the connection of public open space, access to mahinga kai, access to sites of historical and/or cultural importance improving outdoor recreation [...]</i>
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Support	

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
45 – Powerco	424	Support Retain Policy 17 of the Plan as notified.	Accept Support noted. Policy 17 is retained subject to amendments made to offer relief to other submitters concerns where appropriate.
Further submissions – Port Taranaki Ltd (32)		Support	
46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	425	Support Retain Policy 17 of the Plan as notified.	Accept Support noted. Policy 17 is retained subject to amendments made to offer relief to other submitters' concerns where appropriate.
47 – Fonterra	426	Support Retain Policy 17 of the Plan as notified.	Accept Support noted. Policy 17 is retained subject to amendments made to offer relief to other submitters' concerns where appropriate.
48 – Taranaki District Health Board	427	Support Retain Policy 17 of the Plan as notified.	Accept Support noted. Policy 17 is retained subject to amendments made to offer relief to other submitters' concerns where appropriate.
52 – Emily Bailey	428	Amend Submitter seeks amendment to Policy 17(c) of the Plan to restrict public access to cultural sites and privately owned land.	Accept Officers agree with the submitter that restrictions on public access are appropriate in relation to cultural sites and privately owned land. However, it is the view of Officers that these concerns are already recognised and provided for in the Policy. In particular, Policy 18(c)(iii) addresses restrictions to protect sites and activities of cultural value to Māori. Issues associated with public access on privately owned land are more appropriately addressed under other legislation and other plans and do not fall within the jurisdiction of this Council. Notwithstanding that, the issue of public access conflicting with private interests is implicitly covered by Clause (c)(ix) which is recommended to be amended to read: <i>(ix) ensure a level of security <u>for lawfully established activities</u> consistent with the activity, including protection of equipment;</i>
Further submissions – Te Korowai o Ngāruahine Trust (41), Te Atiawa (58)		Support	
58 – Te Atiawa	429	Support Submitter notes concerns regarding public access to sites of significance to Māori and seeks to amend Policy 17(b) of the Plan to read:	Accept Officers agree and recommend amending Policy 17(b) to remove reference to mahinga kai and sites of historical and/or cultural importance. In line with relief requested by this and other submitters, Policy 17(b) would read as follows:

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		<p>Maintain and enhance public access to, along and adjacent to the coastal environment by:</p> <p>[...]</p> <p>Promoting the enhancement or restoration of public access including for the connection of areas of public open space, access to mahinga kai, access to sites of historical and/or cultural importance, improving outdoor recreation [...]</p>	<p>(b) promoting the enhancement or restoration of public access including for the connection of public open space, access to mahinga kai, access to sites of historical and/or cultural importance improving outdoor recreation [...]</p>
59 – KiwiRail	430	<p>Support</p> <p>Retain Policy 17 of the Plan as notified.</p>	<p>Accept</p> <p>Support noted. Policy 17 is retained subject to amendments made to offer relief to other submitters' concerns where appropriate.</p>
Policy 18 – Amenity values			
5 – Point Board Riders Ltd	431	<p>Support</p> <p>Submitter supports Policy 18 of the Plan maintaining and enhancing significant amenity values associated with surf breaks identified in Schedule 7.</p>	<p>Accept</p> <p>Officers note the submitter's support for Policy 18(b).</p>
15 – Surfbreak Protection Society	432	<p>Amend</p> <p>Submitter supports in part Policy 18 of the Plan but seeks amendments to Policy 18(c) which only seeks to maintain and enhance significant amenity values associated with those surf breaks identified in Schedule 7 of the Plan and also believes that the current provisions are not consistent with section 5 of the RMA. The submitter wishes to see the protections within Policy 18(c) expanded to also include local surf breaks not listed in Schedule 7</p>	<p>Decline</p> <p>Officers note that Schedule 7 identifies 140 surf breaks of national, regional and local significance. Identification and classification of these surf breaks was a comprehensive and collaborative exercise involving community and expert advice to identify surf breaks across Taranaki. That exercise identified 140 surf breaks with attributes and characteristics triggering our significance criterion. The Council is unaware of any surf breaks that are not identified within Schedule 7 and would welcome any additional information that the submitter can offer.</p> <p>The submitter believes that the current protections provided for are not consistent with section 5 of the RMA but has not indicated how or why this view is held. Officers have a contrary view and believe that the Council is to the forefront in surf break protection in New Zealand under the RMA.</p>
20 – Meridian Energy	433	<p>Amend</p> <p>Submitter wishes to see the reference to historic heritage deleted from Policy 18. The submitter notes that historic sites do not necessarily have any amenity values and that appropriate historic heritage matters are already covered in Policy 15 [Historic heritage].</p>	<p>Decline</p> <p>Officer acknowledge the point made by the submitter, however, the inclusion has been intentionally made in order to recognise that historic heritage is commonly associated with high amenity values. For example, the RMA definition of "historic heritage" includes sites of significance to Māori. As identified in Schedule 5 there are</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		<p>Submitter seeks amendment to Policy 18 of the Plan to delete reference to historic heritage:</p> <p><i>Maintain and enhance significant amenity values by avoiding, remedying or mitigating adverse effects on: [...]</i></p> <p>(d) historic heritage sites including those identified in Schedule 5.</p>	<p>a number of historic sites and places that clearly overlap with amenity values. They include mahinga kai, ataitai, hi ika sites not counting wild or scenic values that may also be associated with these sites and places.</p> <p>Officers note that many submitters have also requested to expand Policy 18(d) in order to better provide for historic heritage sites that also have amenity values. Officers recommend that Policy 18(d) not be deleted.</p>
Further submissions – Te Atiawa (58), Te Rūnanga o Ngāti Ruanui Trust (61)		Oppose	
22 – Lyndon DeVantier	434	<p>Support</p> <p>Submitter supports aspirations in Policy 18 of the Plan to maintain and enhance significant amenity values.</p>	<p>Accept</p> <p>Support noted.</p>
29 – Department of Conservation	435	<p>Amend</p> <p>Submitter seeks amendment to Policy 18 of the Plan by including a new provision to read:</p> <p><i>(e) other areas of the coastal environment with significant amenity values not identified in the Schedules referred to in (a), (b), (c) and (d). [...]</i></p>	<p>Accept</p> <p>The submitter wishes to broaden the coverage of Policy 18 to include other areas with significant amenity values not identified in the Schedules. The suggested amendment is in accordance with Policies 6 [Activities in the coastal environment], 13 [Preservation of natural character] and 18 [Public open spaces] of the <i>New Zealand Coastal Policy Statement</i> and officers agree to include a new Clause (e) within the policy as requested by the submitter.</p>
Further submissions – Federated Farmers (2), Te Rūnanga o Ngāti Ruanui Trust (61)		Support	
41 – Te Korowai o Ngāruahine Trust	436	<p>Amend</p> <p>Submitter seeks amendment to Policy 18 of the Plan by:</p> <ul style="list-style-type: none"> including references to Schedule 5A and B [Historic Heritage] rather than Schedule 5 including references to Schedule 4A [Significant species and ecosystems]. 	<p>Accept in part</p> <p>Officers recommend granting the relief sought by the submitter.</p> <p>Amenity values, as defined by the RMA, refers to any natural or physical qualities and characteristics of an area that contribute to people's appreciation of its pleasantness, aesthetic coherence, and cultural and recreational attributes. Clearly indigenous biodiversity and cultural and historic heritage values may contribute to amenity values. Officers therefore recommend amending Policy 18(d) to broaden its focus to require consideration of amenity attributes and values associated with sites scheduled in the Plan as significant for their indigenous biodiversity, taonga species and historic heritage.</p> <p>The revised Policy would read as follows:</p>
Further submissions – Te Rūnanga o Ngāti Mutunga (40), Te Atiawa (58)		Support	

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
			<p>Recognise and provide for the maintenance and enhancement of significant amenity values by avoiding, remedying or mitigating adverse effects on: [...]</p> <p>(d) coastal sites with significant indigenous biodiversity identified in Schedule 4, taonga species identified in Schedule 4CC, or historic heritage sites including those identified in Schedule 5A and B and Appendix 2 [...]</p>
43 – Royal Forest and Bird Protection Society	437	<p>Amend</p> <p>Submitter supports Policy 18 of the Plan but requests that it be amended to recognise amenity values associated with protecting indigenous biodiversity.</p>	<p>Accept</p> <p>Officers agree with the requested amendment to protect indigenous biodiversity. The revised Policy would read as follows:</p>
Further submissions – Meridian Energy Ltd (20)		Oppose	<p>Recognise and provide for the maintenance and enhancement of significant amenity values by avoiding, remedying or mitigating adverse effects on: {...}</p> <p>(d) coastal sites with significant indigenous biodiversity identified in Schedule 4, taonga species identified in Schedule 4, or historic heritage sites including those identified in Schedule 5A and B and Appendix 2 [...]</p>
Further submissions – Te Korowai o Ngāruahine Trust (41)		Support	
45 – Powerco	438	<p>Support</p> <p>Retain Policy 18 of the Plan as notified.</p>	<p>Accept</p> <p>Support noted. Policy 18 is retained subject to amendments made to offer relief to other submitters' concerns where appropriate.</p>
Further submissions – Port Taranaki Ltd (32)		Support	
46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	439	<p>Support</p> <p>Retain Policy 18 of the Plan as notified.</p>	<p>Accept</p> <p>Support noted. Policy 18 is retained subject to amendments made to offer relief to other submitters' concerns where appropriate.</p>
47 – Fonterra	440	<p>Support</p> <p>Retain Policy 18 of the Plan as notified.</p>	<p>Accept</p> <p>Support noted. Policy 18 is retained subject to amendments made to offer relief to other submitters' concerns where appropriate.</p>
58 – Te Atiawa	441	<p>Amend</p> <p>Submitter seeks amendment to Policy 18 to refer specifically to Schedule 5A and 5B [Historic Heritage] rather than Schedule 5 and to include Schedule 4A [Significant species and ecosystems].</p>	<p>Accept</p> <p>Officers agree with the requested amendments to include Schedule 4A and to refer to Schedule 5 as Schedule 5A and 5B. The revised Policy would read as follows:</p> <p>Recognise and provide for the maintenance and enhancement of significant amenity values by avoiding, remedying or mitigating adverse effects on: [...]</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
			(d) coastal sites with significant indigenous biodiversity identified in Schedule 4, taonga species identified in Schedule 4, or historic heritage sites including those identified in Schedule 5A and B and Appendix 2 [...]
61 – Te Rūnanga o Ngāti Ruanui Trust	442	<p>Amend</p> <p>Submitter seeks amendment to Policy 18 to read:</p> <p><i>Maintain and enhance significant amenity values by avoiding, remedying or mitigating adverse effects on:</i></p> <p>(a) <i>coastal areas of outstanding value identified in Schedules 1 and 2;</i></p> <p>[...]</p> <p>(d) <i>cultural and historic heritage sites including those habitats with taonga species identified in Schedule 4C and sites identified in Schedule 5 and Appendix 2.</i></p>	<p>Accept</p> <p>The submitter proposes amendments to Policy 18(a) and (d). Officers note that many other submitters have requested similar amendments. Officers agree to the requested relief as notified by the submitter.</p> <p>The revised Policy would read as follows:</p> <p><i>Recognise and provide for the maintenance and enhancement of significant amenity values by avoiding, remedying or mitigating adverse effects on:</i></p> <p>(a) <i>coastal areas of outstanding value identified in Schedules 1 and 2; [...]</i></p> <p>(d) <i>coastal sites with significant indigenous biodiversity identified in Schedule 4, taonga species identified in Schedule 4, or historic heritage sites including those identified in Schedule 5A and B and Appendix 2 [...]</i></p>
Further submissions – Te Korowai o Ngāruahine Trust (41)		Support	
Policy 19 – Surf breaks and Significant Surfing Area			
2 – Federated Farmers	443	<p>Amend</p> <p>Submitter seeks amendment to the Plan and associated planning maps to move the inland boundary of the Significant Surfing Area seaward to the mean high water springs or similar, to avoid potential (and probably unintended) restrictions on normal farming activities.</p>	<p>Accept</p> <p>The inland extent of the Significant Surfing Area was initially influenced by the Southern Taranaki District Council's coastal protection area with the intention of maintaining the seascape. However, the policy is primarily for the protection of surf breaks not landscape values and, therefore, after considering the implications this may have on privately owned land, officers recommend moving the inland extent of the Significant Surfing Area to the coastal marine area as requested.</p>
2 – Federated Farmers	444	<p>Amend</p> <p>Submitter seeks amendment to Policy 19(b) and (d) to read:</p> <p><i>Protect surf breaks and their use and enjoyment from the adverse effects of other activities in the coastal environment Coastal Marine Area by:</i></p> <p>(a) <i>avoiding adverse effects on:</i></p> <p>(i) <i>all nationally significant surf breaks as identified in Schedule 7; and</i></p> <p>(ii) <i>all surf breaks within the designated Significant Surfing Area as identified in Schedule 7;</i></p>	<p>Accept in part</p> <p>Officers note that references to the “coastal environment” in Policy 19 (rather than “coastal marine area”) is intentional. It ensures that when managing adverse effects of use and development in the coastal marine area, there is wider consideration (through Policy 19) of effects on the wider coastal environment. Policy 19 and its application to the coastal environment promotes the integrated management of the wider area across environmental domains and local authority jurisdictional boundaries. This is consistent with Policy 4 of the <i>New Zealand Coastal Policy</i></p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		<p>(b) avoiding adverse effects on all regionally significant surf breaks, identified in Schedule 7, that are outside of the Significant Surfing Area 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;</p> <p>(c) avoiding, remedying or mitigating adverse effects on all locally significant surf breaks listed in Schedule 7;</p> <p>(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</p> <p>(e) in managing adverse effects in accordance with clauses (a), (b) and (c), having regard to:</p> <p>(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 reflection, refraction or diffraction of wave energy; or change the morphology of the foreshore or seabed; and</p> <p>(ii) the effects on access to surf breaks and other qualities of surf breaks, including natural character, water quality and amenity values.</p>	<p>Statement and contributes to meeting Objective 1 [Integrated management] of the Plan.</p> <p>Provisions for (b) is limited to regionally important infrastructure and officers do not agree that it should extend to include farming activities. However, officers note that the application of the Policy is through rules which pertain to activities in the coastal marine area. As such, land based farming activities are highly unlikely to create the types of effects outlined in (e).</p> <p>Clause (d) relates to development within the Significant Surfing area, it is not necessary or appropriate to refer to the coastal marine area. Officers do not believe farming activities are particularly affected by this Policy. Notwithstanding that, officers suggest some of the submitter's concerns may be partially addressed by granting relief sought by other submitters whereby the landward extent of the Significant Surfing Area has been amended to be the mean high water springs.</p> <p>Within Clause (e)(ii), officers recommend granting the relief in part by removing reference to "access to". Access to surf breaks is one of many important consideration for managing adverse effects and it is suggested that this clause focus on other qualities of surf breaks. The revised Clause would read as follows:</p> <p>(ii) the effects on access to surf breaks and other qualities and characteristics that contribute to use and enjoyment of surf breaks, including natural character, water quality, and amenity values.</p>
Further submissions – Powerco (45)		Support in part	
5 – Point Board Riders	445	<p>Support</p> <p>Retain Policy 19 of the Plan as notified.</p>	<p>Accept</p> <p>Support noted. Policy 19 is retained subject to minor amendments made to offer relief to other submitters' concerns where appropriate.</p>
15 – Surfbreak Protection Society	446	<p>Amend</p> <p>The submitter supports, in part, Policy 19 but seeks amendments to address concerns that Policy 19(b) only requires, in relation to activities necessary for the provision of Regional Important Infrastructure, that adverse effects that cannot be avoided, to be remedied or mitigated.</p> <p>Also have concerns that Policy 19(c) only seeks to avoid, remedy or mitigate adverse effects on locally significant surf breaks identified in Schedule 7.</p>	<p>Decline</p> <p>Officers recommend declining the relief sought by the submitter.</p> <p>Officers note that the Policy reference to "significant adverse effects" is intentional and considered appropriate as it recognises other statutory and societal obligations to provide for Regionally Important Infrastructure. "Regionally Important Infrastructure" is defined by the Plan and is confined to a relatively small list of infrastructure in Taranaki that are essential for to the social, economic and cultural well-being of the region. In the rare occasions when there may be conflict between the need to provide for regionally significant infrastructure and the need to protect regionally significant</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
			<p>surfbreaks (not otherwise identified as nationally significant or being in the Significant Surfing Area) it might not be appropriate or practicable to avoid all adverse effects. In such circumstances, officers believe it would be appropriate to canvas all management options, which include avoidance, remediation and/or mitigation.</p>
19 – South Taranaki District Council	447	<p>Amend</p> <p>Submitter seeks amendment to Policy 19 to read: <i>Protect surf breaks and their use and enjoyment from the adverse effects of other activities <u>to</u>by:</i> <i>(a) avoid <u>remedy or mitigate</u> significant adverse effects on: [...]</i> OR remove reference to “natural character” and “amenity values” from Policy 19 e(ii).</p>	<p>Decline</p> <p>The submitters propose that the Council wish to provide a higher level of protection to a wider area than identified in the <i>New Zealand Coastal Policy Statement</i> and suggests that under this provision it would be 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 an acceptable level of effects or provide for effects to be remedied or mitigated.</p> <p>Officers note the concern of the submitter, however, the omission of “<i>remedied or mitigated</i>” was intentional as it provides clear direction that a higher level of protection is sought for an area that has been identified as unique for the high concentration of high quality surf breaks within a relatively confined geographical area. The <i>New Zealand Coastal Policy Statement</i> already requires the Council to adopt a high level of protection for nationally significant surf breaks, including the avoidance of adverse effects. Policy 19(a) is simply an extension of that concept.</p> <p>Officers would like to point out that Plan users are only required to avoid <u>significant</u> adverse effects and the Policy does not, nor is it intended to, prohibit any activity that will result in minor or transitory adverse effects. Of note, in response to reliefs sought by other submitters the landward extent of the Significant Surfing Area has been amended to be the mean high water springs. This may partially address some of the submitter’s concerns relating to the application of the Policy on the landward part of the coastal environment.</p>
Further submissions – Powerco (45)		Support in part	
22 – Lyndon DeVantier	448	<p>Other</p> <p>Submitter supports aspirations in Policy 19 but raises concerns relating to impacts arising from the Significant Surfing Area, the engagement process, and the threats posed by surfing competitions and increased visitor numbers.</p>	<p>No relief necessary</p> <p>The submitter does not expressly request amendments to Policy 19 but does highlight a number of concerns, presumably in opposition to the concept of the Significant Surfing Area, that warrant a response.</p> <p>Concerns relating to the engagement process are noted. However, officers note that the proposals to identify and provide a high level of protection to all surf breaks between Kahihi Road and Cape Road originated from a consultant’s report entitled <i>Taranaki Surf breaks of National Significance</i>, with attributes of surf breaks in that area being later confirmed through and online community survey. The proposal was</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
			<p>further consulted on through a Draft Proposal that was widely distributed to interested parties and then the Proposed Plan.</p> <p>Concerns raised by the submitter primarily relate to matters outside the jurisdiction of the Council. They include issues around conflict between organised events, overcrowding, tourism impacts on the environment, freedom camping, and the provision of infrastructure. The concerns are valid and though largely outside the regulatory framework of the Plan (whereby the rules apply to the coastal marine area only), it does highlight the importance of Plan methods and the need for councils and other parties to work together to address the concerns.</p>
26 – Transpower NZ Ltd	449	<p>Amend</p> <p>The submitter wishes to amend Policy 19 in order to bring the Policy into closer alignment with Policy 8 [Aquaculture] of the <i>New Zealand Coastal Policy Statement</i> by amending Policy 19(b) to read:</p> <p><i>Protect surf breaks and their use and enjoyment from the adverse effects of other activities by:</i></p> <p>[...]</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 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 possible practicable and adverse effects are remedied or mitigated to the extent reasonably practicable; [...]</i></p>	<p>Accept</p> <p>The submitter requests that the word “possible” has a very confined meaning and conveys only a technical requirement whereas there may be a variety of other reasons why adverse effects cannot be avoided. The suggested replacement “practicable” is in accordance with the Policy 8 <i>National Policy Statement for Electrical Transmission</i>. The submitter also requests to include “adverse” effects within the Policy to clarify that it is adverse effects which are the issue.</p> <p>Officers agree with the requested relief and accept the proposed changes to Policy 19 (b).</p>
32 – Port Taranaki	450	<p>Amend</p> <p>Submitter seeks amendment to Policy 19(b) of the Plan to read:</p> <p><i>Protect surf breaks and their use and enjoyment from the adverse effects of other activities by:</i></p> <p>[...]</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, avoidance of effects is not possible, and adverse effects are remedied or mitigated; [...]</i></p>	<p>Accept in kind</p> <p>The submitter is concerned that Policy 19(b) and the exemption for regionally important infrastructure is unclear. In particular, the submitter is concerned that the proviso that avoidance of effects is not practicable” is ambiguous and potentially sets unrealistic expectations.</p> <p>Officers agree in part to the relief sought by the submitter but recommend an alternative relief based upon a relief sought by another submitter (see above) with similar concerns.</p> <p>The amended Policy would read as follows:</p> <p><i>Protect surf breaks and their use and enjoyment from the adverse effects of other activities by:</i></p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
			<p>(a) avoiding adverse effects on:</p> <p>(i) nationally significant surf breaks as identified in Schedule 7; and</p> <p>(ii) surf breaks within the designated Significant Surfing Area as identified in Schedule 7;</p> <p>(b) avoiding significant adverse effects on all regionally significant surf breaks, identified in Schedule 7, that are outside of the Significant Surfing Area;</p> <p>unless <u>following a route, site and method selection process</u>, the activity is necessary for the provision of regionally important infrastructure, avoidance of adverse effects is not <u>possible practicable</u> and adverse effects are remedied or mitigated <u>to the extent reasonably practicable</u>; [...]</p>
41 – Te Korowai o Ngāruahine Trust	451	<p>Amend</p> <p>Submitter seeks amendment to Policy 19 of the Plan to ensure the protection of the surf breaks is not incompatible with the traditional cultural sites of significance, including those set out in Schedule 5B.</p>	<p>Accept in part</p> <p>Officers note that all General Policies (and relevant Activity-specific Policies) must be considered together. Accordingly, all activities, not just those associated with protection of surfing values, need to consider adverse effects on traditional cultural sites of significance, including those set out in Schedule 5B. The submitter has highlighted an issue in this part of the Policy whereby some associative values have been identified (and not others) thereby potentially derogating from the aforementioned approach. It is not considered necessary to paraphrase other Policies and indeed there are risks in doing so. Officers recommend an alternative relief whereby Policy 19(e) is reframed to focus only on surfing attributes and adverse effects on other values be addressed in their relevant policies elsewhere (e.g. under the relevant natural character, historic heritage or public access policies).</p> <p>The amended Policy 19(e) would read as follows:</p> <p><i>Protect surf breaks and their use and enjoyment from the adverse effects of other activities by:</i></p> <p>(e) in managing adverse effects in accordance with clauses (a), (b) and (c), having regard to:</p> <p>(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 reflection, refraction or diffraction of wave energy; or change the morphology of the foreshore or seabed; and</p> <p>(ii) the effects on access to surf breaks and other qualities and characteristics that contribute to use and enjoyment of surf breaks, including natural character, water quality, and amenity values.</p>
Further submissions – Te Rūnanga o Ngāti Mutunga (40), Te Atiawa (58)		Support	

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
43 – Royal Forest and Bird Protection Society	452	Support	Accept
		Retain Policy 19 of the Plan as notified.	Support noted. Policy 19 is retained subject to minor amendments made to offer relief to other submitters' concerns where appropriate.
45 – Powerco	453	Support	Accept
		Retain Policy 19 of the Plan as notified.	Support noted. Policy 19 is retained subject to minor amendments made to offer relief to other submitters' concerns where appropriate.
49 – Cam Twigley	454	Amend	Accept in kind
		<p>Submitter seeks amendment to Policy 19(d) of the Plan to read:</p> <p><i>Protect surf breaks and their use and enjoyment from the adverse effects of other activities by: [...]</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 which would have an adverse effect on the remote feel of the area; and in managing adverse effects in accordance with clauses (a), (b) and (c), having regard to: [...]</i></p>	<p>Submitter believes that Policy 19(d) is in conflict with Policy 19(a)(ii) in relation to the levels of protection provided for. In Policy 19(a) there is a requirement to avoid adverse effects of all surf breaks within the designated Significant Surfing Area while in Policy 19(d) there is only need to avoid significant adverse effects.</p> <p>Officers agree that there are conflicts between the differing levels of protection for the Significant Surfing Area provided in Clauses (a) and (d) of Policy 19, which require resolving.</p> <p>Clause (d) refers to seascapes. Officers recommend an alternative relief to that proposed by the submitter by deleting Clause (d).</p> <p>Seascapes are more appropriately provided for under Policy 8(b) [Areas of outstanding value] and/or Policy 9 [Natural character]. In response to reliefs sought by other submitters to the planning maps, officers have recommended confining the extent of the significant surfing zone to the coastal marine area line and removing the inland component of the coastal environment. This amendment makes Clause (d) redundant as seascapes are no longer captured within the designated area.</p>
58 – Te Atiawa	455	Amend	Accept
		Submitter seeks amendment to Policy 19 of the Plan to ensure that the protection of the surf breaks is not incompatible with the traditional cultural uses expressed by Māori in Schedules 5B.	Officers note that all General Policies (and relevant Activity-specific Policies) must be considered together. Accordingly, all activities, not just those associated with protection of surfing values, need to consider adverse effects on traditional cultural sites of significance, including those set out in Schedule 5B. The submitter has highlighted an issue in this part of the Policy whereby some associative values have been identified (and not others) thereby derogates from the aforementioned approach. It is not considered necessary to paraphrase other policies and indeed there are risks in doing so. Officers recommend an alternative relief whereby Policy 19(e) is reframed to focus only on surfing attributes and adverse effects on other

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
			<p>values be addressed in their relevant policies elsewhere (e.g. under the relevant natural character, historic heritage or public access policies).</p> <p>The amended Policy 19(e) would read as follows:</p> <p><i>Protect surf breaks and their use and enjoyment from the adverse effects of other activities by:</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 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 and characteristics that contribute to use and enjoyment of surf breaks, including natural character, water quality, and amenity values.</i></p>
Policy 20 – Avoidance of increasing coastal hazard or public safety risks			
2 – Federated Farmers	456	<p>Other</p> <p>Submitter seeks that provisions designed to protect against coastal hazards avoid unnecessarily capturing farm infrastructure.</p>	<p>No relief necessary</p> <p>Officers recognise the concerns of the submitter but note that Policy 20 only addresses infrastructure that <u>increases</u> the risk from coastal hazards and is therefore more likely to protect farm infrastructure at risk from natural hazards such as coastal erosion.</p>
6 – Trans-Tasman Resources Ltd	457	<p>Amend</p> <p>Submitter seeks amendment Policy 20 of the Plan to read:</p> <p><i>Avoid increasing the risk of social, environmental and economic harm from coastal hazards or posing a threat and avoid increased risks to public health and safety, or aircraft or navigation safety including by:[...]</i></p>	<p>Accept</p> <p>Officers agree and recommend amending Policy 20 to read:</p> <p><i>Avoid increasing the risk of social, environmental and economic harm from coastal hazards <u>and avoid increased risks</u> to public health and safety, or aircraft or navigation safety including by: [...]</i></p>
Further submissions – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd (46)		Support in part	
Further submissions –Taranaki Energy Watch – Support)		Support	
	458	Amend	Accept in kind

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd		Submitter supports Policy 20 of the Plan subject to following amendments: <i>Avoid unacceptable increases in the risk of social, environmental and economic harm from coastal hazards or posing a threat to public health and safety, or aircraft or navigation safety including by:[..]</i>	Submitter's concerns are noted but officers note that the current Policy is aligned with Policy 25(a) of the <i>New Zealand Coastal Policy Statement</i> and the use of the term "unacceptable" would be ambiguous thereby reducing the certainty and clarity to those applying the policy.
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Oppose	To address the submitter's concerns an alternative relief is proposed (based upon a relief sought by another submitter) that amends Policy 20 to reads as follows: <i>Avoid increasing the risk of social, environmental and economic harm from coastal hazards and avoid increased risks to public health and safety, or aircraft or navigation safety including by: [...]</i>
48 – Taranaki District Health Board	459	Support Retain Policy 20 of the Plan as notified.	Accept Support noted. Policy 20 is retained subject to minor amendments made to offer relief to other submitters' concerns where appropriate.
Further submissions – Port Taranaki Ltd (32)		Oppose	
Policy 21 – Natural hazard defences			
2 – Federated Farmers	460	Amend Submitter supports in part Policy 21 of the Plan but seeks that provisions designed to protect against coastal hazards avoid unnecessarily capturing farm infrastructure.	No relief necessary Officers note that Policy 21 relates to natural hazard defences, therefore, any capture of farm infrastructure is likely to be very limited.
42 – Ngati Hine Hapu of Te Atiawa	461	Amend Submitter supports Policy 21 of the Plan but seek amendment to show how or what will be done to provide a natural defence from coastal hazards.	Decline Policy 21 gives effect to Policy 26 [Natural defences against coastal hazards] of the <i>New Zealand Coastal Policy Statement</i> . It recognises that natural defences should be provided for where appropriate, however, officers do not believe it is necessary to go into the details of how this is to be achieved. Such detail is better outlined elsewhere in the Plan and through consenting processes. Section 6 [Methods of implementation] sets out non regulatory methods for addressing natural hazard defences. The Policy will also inform consenting processes associated with implementing rules. The detail as to how or what will be done to provide a natural hazard defence should be considered at the consenting level having regard for the necessary policies, methods and rules.
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Support	
	462	Support	Accept

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
43 – Royal Forest and Bird Protection Society		Retain Policy 21 of the Plan as notified.	Support noted. Policy 21 is retained as currently notified.
Further submissions – Port Taranaki Ltd (32)		Support	
Section 5.2 – Activity-based policies			
57 – Heritage New Zealand	463	Amend Submitter seeks amendment to the preamble in Section 5.2 [Activity-based policies] of the Plan to read: <i>[...] The activity-based policies must be considered alongside the general policies and never in isolation. <u>Where a policy in this section conflicts with a general policy in 5.1, the general policy takes precedence.</u></i>	Accept The submitter wishes to clarify the relationship between the General Policies in 5.1 and the activity-based policies, in particular, set out what takes precedence when the policies in each section are in conflict. The submitter considers the general policies should take precedence and the activity-based policies function be to provide additional detail. Officers agree to amend section 5.2 with slightly different wording to maintain consistency throughout the Plan that achieves the intent sought by the submitter.
Further submissions – Trans-Tasman Resources Ltd (6), Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd (46)		Oppose	
Policy 22 – Discharge of water or contaminants to coastal water			
8 – Silver Fern Farms	464	Support Retain Policy 22 of the Plan to provide for the discharge of contaminants to coastal waters, where it is the most practicable option.	Accept Support noted. Policy 22 is retained subject to minor amendments made to offer relief to other submitters' concerns where appropriate.
Further submissions – Federated Farmers (2)		Support	
15 – Surfbreak Protection Society	465	Other Submitter supports in part Policy 22 of the Plan but question what and how to measure "acceptable quality".	No relief necessary Acceptable quality recognises that discharges of water or contaminants to water in the coastal marine area takes many forms – ranging from point source discharges to land runoff of rainfall. The effects of the discharges are likely to vary based upon the type volume of contaminants in the discharge plus location. Policy 22(a) therefore necessarily requires discharges to be considered on a case by case basis that determines the acceptability of the discharge based upon the matters considered in Policy 22(a)(i) to (iii). These relate to having regard to the sensitivity of the receiving environment, including associated values, the nature and concentration of the

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
			contaminants and the efficiency of waste reduction, treatment and disposal measures and the capacity of the receiving environment to assimilate the contaminants. What is considered "acceptable quality" will be determined on a case by case basis through the consenting process being directed by the requirements of Policy 22.
33 - New Zealand Defence Force	466	Support	Accept
		Retain Policy 22 of the Plan as notified.	Support noted. Policy 22 is retained subject to minor amendments made to offer relief to other submitters' concerns where appropriate.
40 – Te Rūnanga o Ngāti Mutunga	467	Amend	Accept
		Submitter seeks amendment to Policy 22 of the Plan to read: <i>Discharges of water or contaminants to water in the coastal marine area will must: [...]</i>	The use of terms with similar meanings such as "must", "will" and "shall" has been alternatively adopted throughout many second generation planning documents, including national policy statements and regional plans. A number of submitters have identified they prefer the term "must", instead of "will" in relevant policies. Some have argued that the use of the term "must" is more legally robust. Officers have no objection to making the change noting that the policy intent of this Policy is that the activity needs to comply with the provision.
43 – Royal Forest and Bird Protection Society	468	Support	Accept
		Retain Policy 22 of the Plan as notified.	Support noted. Policy 22 is retained subject to minor amendments made to offer relief to other submitters' concerns where appropriate.
Further submissions – Port Taranaki Ltd (32)		Support	
46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	469	Amend	Decline
		Submitter supports Policy 22 of the Plan subject to following amendments: <i>Discharges of water or contaminants to water in the coastal marine area will:</i> <i>(a) be of an acceptable quality with regard to:</i> <i>(i) the sensitivity of the receiving environment;</i> <i>(ii) the nature and concentration of the contaminants to be discharged and the efficacy of waste contaminant reduction, treatment and disposal measures [...]</i>	The submitter wishes to amend the policy to provide greater clarity for Plan users regarding Policy 22(a)(ii). Officers do not consider this relief necessary as a contaminant is only one constituent that may contribute to a waste. Officers do not wish to narrow the focus of the clause as "waste reduction", "waste treatment" and "waste disposal measures" offer broader application than the proposed alternatives.
47 – Fonterra	470	Amend	Accept
		Submitter seeks amendment to Policy 22(c), (d) and (e) of the Plan to read:	The submitter considers that Policy 22(c) does not sufficiently identify the circumstances in which the best practicable option should be implemented. They

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		<p><i>Discharges of water or contaminants to water in the coastal marine area will: [...]</i></p> <p><i>(c) Adopt the best practicable option for the treatment and discharge to prevent or minimise adverse effects on the environment [...]</i></p> <p><i>(d) be required, where appropriate, to reduce adverse environmental effects through a defined programme of works over an appropriate timeframe set out as a condition of consent for either new resource consents or during a renewal or review process for existing resource consents;</i></p> <p><i>(e) use the smallest mixing zone necessary to achieve the required water quality in the receiving environment and minimise as far as practicable the adverse effects on life supporting capacity within the mixing zone; [...]</i></p>	<p>suggest the amendment would ensure consistency with the definition of “best practicable option” as set out in the RMA. Officers recommend amending Clause (c) requested.</p> <p>For Clause (d) the submitter considers it necessary to make reference to the programme of works occurring over an appropriate timeframe. Officers agree to the proposed relief as it is reasonable to allow an appropriate timeframe where it is set out within a resource consent.</p> <p>The submitter seeks to amend Clause (e) to refer to “life supporting capacity”. This would maintain consistency with Policy 23(1)(e) and (f) of the <i>New Zealand Coastal Policy Statement</i>. Officers agree to this amendment as sought by the submitter.</p>
48 – Taranaki District Health Board	471	<p>Amend</p> <p>Submitter seeks amendment to Policy 22 of the Plan to read: <i>Discharges of water or contaminants to water in the coastal marine area will must: [...]</i></p>	<p>Accept</p> <p>The use of terms with similar meanings such as “<i>must</i>”, “<i>will</i>” and “<i>shall</i>” has been alternatively adopted throughout many second generation planning documents, including national policy statements and regional plans.</p> <p>A number of submitters have identified they prefer the term “must”, instead of “will” in relevant policies. Some have argued that the use of the term “must” is more legally robust. Officers have no objection to making the change noting that the policy intent of this Policy is that the activity needs to comply with the provision.</p>
51 - Taranaki Energy Watch	472	<p>Amend</p> <p>Submitter seeks amendment to Policy 22 of the Plan to incorporate a precautionary approach.</p>	<p>No relief necessary</p> <p>A precautionary approach is set out in Policy 3 of the Plan. Officers would like to point out that all of the policies apply to all activities in the coastal environment, regardless of which coastal management area the activity may fall within. For this reason, it is unnecessary to repeat the provisions of Policy 3 within Policy 22. However, officers would like to assure the submitter that the precautionary approach is required when addressing activities within Policy 22.</p>
Further submissions – Te Korowai o Ngāruahine Trust (41)		Support	
60 – Te Kaahui o Rauru	473	<p>Amend</p> <p>Submitter seeks amendment to Policy 22(a) of the Plan to include Māori values as a criteria for acceptable quality.</p>	<p>Accept in kind</p> <p>Officers note that the sensitivity of the environment will vary depending upon location and, amongst other things, associative values, which include Māori but also other values. In order to more explicitly recognise associative uses and values associated with coastal waters, officers recommend an amendment to Policy 22(a)(i) to read: <i>Discharges of water or contaminants to water in the coastal marine area will:</i></p>
Further submissions – Te Rūnanga o Ngāti Mutunga (40), Te Korowai o Ngāruahine Trust (41), Te Atiawa		Support	

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
(58), Te Rūnanga o Ngāti Ruanui Trust (61)			<p>(a) be of an acceptable quality with regard to:</p> <p>(i) the sensitivity of the receiving environment <i>and associated uses and values</i>; [...]</p> <p>Officers also note that (f) refers to adverse effects generally, which includes Māori values. Policy 22 needs to be read in conjunction with the General Policies, including Policies 12 and 13.</p>
Policy 23 – Discharge of untreated human sewage			
15 – Surfbreak Protection Society	474	Support	Accept
		Retain Policy 23 of the Plan prohibiting discharges of untreated human sewage.	Support noted. Policy 23 is retained as notified.
40 – Te Rūnanga o Ngāti Mutunga	475	Support	Accept
		Retain Policy 23 of the Plan prohibiting discharges of untreated human sewage.	Support noted. Policy 23 is retained as notified.
43 – Royal Forest and Bird Protection Society	476	Support	Accept
		Retain Policy 23 of the Plan as notified.	Support noted. Policy 23 is retained as notified.
48 – Taranaki District Health Board	477	Support	Accept
		Retain Policy 23 of the Plan as notified.	Support noted. Policy 23 is retained as notified.
Policy 24 – Discharge of treated wastewater containing human sewage			
15 – Surfbreak Protection Society	478	Other	No relief necessary
		Submitter suggests Policy 24 of the Plan is in conflict with other water quality policies and seems more permissive.	<p>The submitter has not indicated how or where such conflicts are alleged nor provided specific relief to alleviate their concerns.</p> <p>Officers do not consider Policy 24 to be permissive or to be in conflict with other Policies relating to discharges to the coastal marine area. Policy 24 recognises that there are circumstances when treated discharges of wastewater containing human sewage may be appropriate (most cities in New Zealand discharge wastewater either directly or indirectly to the coastal marine area). The Policy only allows such discharges to the open coast and only following careful evaluation of alternatives to discharging (including land disposal and wetland treatment) and consultation with tangata whenua and the community generally. Through the consenting process (whereby such discharges are confined to the Open Coast coastal management area and are processed as a Discretionary Activity) Policy 24 will be read alongside all</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
			<p>other General Policies and is required to fulfil the other General Policies as well as Policy 24.</p> <p>Officers note that amendments have been made to the introduction of Section 5.2 of the Plan to clarify that in the event of any inconsistency between an Activity-specific Policy and a General Policy, the General Policy will take precedence.</p>
40 – Te Rūnanga o Ngāti Mutunga	479	<p>Amend</p> <p>Submitter seeks amendment to Policy 24 of the Plan to replace proposed Policy so as to prohibit any discharges of wastewater to the coastal marine area with: <u><i>Discharges of treated wastewater containing human sewage will not be allowed.</i></u></p>	<p>Decline</p> <p>Officers recommend declining the relief sought by the submitter.</p> <p>The relief sought would immediately preclude existing lawful discharges of municipal waste discharges to the coastal marine area in the absence of any other practicable options. To divert the quantities of waste onto land or other receiving environments is likely to be impracticable due to fiscal and technical constraints plus result in worst environmental outcomes due to the quantities involved and the lack of suitable locations to ensure the waste can be properly and safely assimilated to avoid, minimise or mitigate adverse environmental effects.</p>
Further submissions – Te Korowai o Ngāruahine Trust (41)		Support	<p>Officers note Taranaki only has three municipal wastewater discharges. The resource consents for these marine outfalls include conditions that the consent holder must adhere to. These conditions are designed to prevent adverse effects by including limits on the discharge (pertaining to quality and quantity) and impact on the receiving environment. Consent holders must regularly reassess whether the current system remains to be the best practicable option, in light of technological advances and changing circumstances. Community involvement in the monitoring and management of these discharges, through involvement plans and stakeholder meetings, is also required in the resource consents.</p> <p>Officers suggest that some provision must be made in the policies and the rules to provide for the discharge of wastewater that contains treated human sewage. Most New Zealand cities discharge water directly or indirectly into the coastal marine area. However, this rule is a Discretionary Activity, which means a resource consent may be granted or declined subject to the policies. A discharge consent application is subject to meeting the directions and guidance set out in General Policies 1 to 21 and Activity-specific Policies 22, 24 and 26. With these Policies any discharge of treated wastewater must be of an acceptable quality and can only be considered when more appropriate alternatives have been considered. This rule is in line with the requirements of the <i>New Zealand Coastal Policy Statement</i> Policy 23 [Discharge of contaminants] (2) and (3) and meets the requirements of the RMA.</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
			It is the officers' view that providing the option to consider discharges of treated wastewater into the coastal marine area is necessary in order to provide for the requirements of the general public. Officers are satisfied that through the resource consents process, adverse environmental effects can be appropriately avoided, remedied or mitigated. Policy 26 in particular is highlighted whereby it is Council's expectation that the best practicable option be adopted to improve the quality of the discharge and reduce the quantity of the discharge.
41 – Te Korowai o Ngāruahine Trust	480	Amend Submitter seeks amendment to Policy 24 of the Plan to explicitly reference iwi as distinct from the general community.	No relief necessary Officers believe that the sought relief is already provided for within Policy 24(b), which requires adequate consultation with tangata whenua so that their values, and the effects on those values, are understood. Tangata whenua includes iwi authorities and may include hapū and whanau groups.
Further submissions – Te Rūnanga o Ngāti Mutunga (40), Te Atiawa (58)		Support	
43 – Royal Forest and Bird Protection Society	481	Amend Submitter seeks amendment to Policy 24 of the Plan to ensure that treated wastewater discharges will not occur where they would result in adverse effects that are to be avoided.	No relief necessary No changes to the Policy are required to give effect to the submitter's relief. Of note, Policy 24 must be read in conjunction with General Policies 1 to 21, which includes policies addressing adverse effects on coastal values and uses that are to be avoided.
48 – Taranaki District Health Board	482	Support Retain Policy 24 of the Plan as notified.	Accept Support noted. Policy 24 is retained as notified.
Further submissions – Port Taranaki Ltd (32)		Support	
58 – Te Atiawa	483	Amend Submitter seeks amendment to Policy 24 of the Plan to read: Discharges of treated wastewater containing human sewage to coastal water will: Discharges of treated wastewater containing human sewage will not be allowed.	Decline Officers recommend declining the relief sought by the submitter. The relief sought would immediately preclude existing lawful discharges of municipal waste discharges to the coastal marine area in the absence of any other practicable options. To divert the quantities of waste onto land or other receiving environments is likely to be impracticable due to fiscal and technical constraints plus result in worst environmental outcomes due to the quantities involved and the lack of suitable locations to ensure the waste can be properly and safely assimilated to avoid, minimise or mitigate adverse environmental effects.
Further submissions – Te Korowai o Ngāruahine Trust (41)		Support	

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
			<p>Officers note Taranaki only has three municipal wastewater discharges. The resource consents for these marine outfalls include conditions that the consent holder must adhere to. These conditions are designed to prevent adverse effects by including limits on the discharge (pertaining to quality and quantity) and impact on the receiving environment. Consent holders must regularly reassess whether the current system remains to be the best practicable option, in light of technological advances and changing circumstances. Community involvement in the monitoring and management of these discharges, through involvement plans and stakeholder meetings, is also required in the resource consents.</p> <p>Officers suggest that some provision must be made in the policies and the rules to provide for the discharge of wastewater that contains treated human sewage. Most New Zealand cities discharge water directly or indirectly into the coastal marine area. However, this rule is a Discretionary Activity, which means a resource consent may be granted or declined subject to the policies. A discharge consent application is subject to meeting the directions and guidance set out in General Policies 1 to 21 and Activity-specific Policies 22, 24 and 26. With these Policies any discharge of treated wastewater must be of an acceptable quality and can only be considered when more appropriate alternatives have been considered. This rule is in line with the requirements of the <i>New Zealand Coastal Policy Statement</i> Policy 23 [Discharge of contaminants] (2) and (3) and meets the requirements of the RMA.</p> <p>It is the officers' view that providing the option to consider discharges of treated wastewater into the coastal marine area is necessary in order to provide for the requirements of the general public. Officers are satisfied that through the resource consents process, adverse environmental effects can be appropriately avoided, remedied or mitigated. Policy 26 in particular is highlighted whereby it is Council's expectation that the best practicable option be adopted to improve the quality of the discharge and reduce the quantity of the discharge.</p>
Policy 25 – New discharge of treated wastewater containing human sewage			
15 – Surfbreak Protection Society	484	<p>Support</p> <p>Retain Policy 25 of the Plan prohibiting new discharges of wastewater containing human sewage in coastal management areas: Outstanding Value, Estuaries Modified, Estuaries Unmodified, and Port.</p>	<p>Accept</p> <p>Support noted. Policy 25 is retained subject to minor amendments made to offer relief to other submitters concerns where appropriate.</p>
	485	<p>Amend</p>	<p>Decline</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
40 – Te Rūnanga o Ngāti Mutunga		Submitter seeks amendment to Policy 25 of the Plan to read: <u><i>New discharges of treated wastewater containing human sewage will not be allowed.</i></u>	<p>Officers recommend declining the relief sought by the submitter.</p> <p>The relief sought would preclude consideration of other practicable future options for managing lawful discharges of municipal waste discharges to the Open Coast coastal management area. To divert the quantities of waste onto land or other receiving environments is likely to be impracticable due to fiscal and technical constraints plus result in worst environmental outcomes due to the quantities involved and the lack of suitable locations to ensure the waste can be properly and safely assimilated to avoid, minimise or mitigate adverse environmental effects.</p> <p>Officers suggest that some provision must be made in the policies and the rules to provide for the discharge of wastewater that contains treated human sewage. Most New Zealand cities discharge water directly or indirectly into the coastal marine area. The resource consents for marine outfalls include conditions that the consent holder must adhere to. These conditions are designed to prevent adverse effects by including limits on the discharge (pertaining to quality and quantity) and impact on the receiving environment. Consent holders must regularly reassess whether the current system remains to be the best practicable option, in light of technological advances and changing circumstances. Community involvement in the monitoring and management of these discharges, through involvement plans and stakeholder meetings, is also required in the resource consents.</p> <p>Officers further note that provision for such discharges in the Open Coast is a Discretionary Activity (and a Non-complying Activity elsewhere), which means a resource consent may be granted or declined subject to the policies. A discharge consent application is subject to meeting the directions and guidance set out in General Policies 1 to 21 and Activity-specific Policies 22, 24 and 26. With these Policies any discharge of treated wastewater must be of an acceptable quality and can only be considered when more appropriate alternatives have been considered. This rule is in line with the requirements of the <i>New Zealand Coastal Policy Statement</i> Policy 23 [Discharge of contaminants] (2) and (3) and meets the requirements of the RMA.</p> <p>It is the officers' view that providing the option to consider discharges of treated wastewater into the coastal marine area is necessary in order to provide for the requirements of the general public. Officers are satisfied that through the resource consents process, adverse environmental effects can be appropriately avoided, remedied or mitigated. Policy 26 in particular is highlighted whereby it is Council's expectation that the best practicable option be adopted to improve the quality of the discharge and reduce the quantity of the discharge.</p>
Further submissions – Te Korowai o Ngāruahine Trust (41)		Support	

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
41 – Te Korowai o Ngāruahine Trust	486	<p>Amend</p> <p>Submitter seeks amendment to Policy 25 of the Plan to prohibit any discharges of wastewater to the coastal marine area.</p>	<p>Decline</p> <p>Officers recommend declining the relief sought by the submitter.</p> <p>The relief sought would immediately preclude existing lawful discharges of municipal waste discharges to the coastal marine area in the absence of any other practicable options. To divert the quantities of waste onto land or other receiving environments is likely to be impracticable due to fiscal and technical constraints plus result in worst environmental outcomes due to the quantities involved and the lack of suitable locations to ensure the waste can be properly and safely assimilated to avoid, minimise or mitigate adverse environmental effects.</p> <p>Officers note Taranaki only has three municipal wastewater discharges. The resource consents for these marine outfalls include conditions that the consent holder must adhere to. These conditions are designed to prevent adverse effects by including limits on the discharge (pertaining to quality and quantity) and impact on the receiving environment. Consent holders must regularly reassess whether the current system remains to be the best practicable option, in light of technological advances and changing circumstances. Community involvement in the monitoring and management of these discharges, through involvement plans and stakeholder meetings, is also required in the resource consents.</p> <p>Officers suggest that some provision must be made in the policies and the rules to provide for the discharge of wastewater that contains treated human sewage. Most New Zealand cities discharge water directly or indirectly into the coastal marine area. However, this rule is a Discretionary Activity, which means a resource consent may be granted or declined subject to the policies. A discharge consent application is subject to meeting the directions and guidance set out in General Policies 1 to 21 and Activity-specific Policies 22, 24 and 26. With these Policies any discharge of treated wastewater must be of an acceptable quality and can only be considered when more appropriate alternatives have been considered. This rule is in line with the requirements of the <i>New Zealand Coastal Policy Statement</i> Policy 23 [Discharge of contaminants] (2) and (3) and meets the requirements of the RMA.</p> <p>It is the officers' view that providing the option to consider discharges of treated wastewater into the coastal marine area is necessary in order to provide for the requirements of the general public. Officers are satisfied that through the resource consents process, adverse environmental effects can be appropriately avoided, remedied or mitigated. Policy 26 in particular is highlighted whereby it is Council's expectation that the best practicable option be adopted to improve the quality of the discharge and reduce the quantity of the discharge.</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
43 – Royal Forest and Bird Protection Society	487	Amend	No relief necessary
		Submitter seeks amendment to Policy 25 of the Plan to ensure that treated waste water discharges will not occur where they would result in adverse effects that are to be avoided.	The submitter's concerns have been noted, however, no changes to the Policy are required to give effect to the submitter's relief. Of note Policy 25 must be read in conjunction with General Policies 1 to 21, which includes policies addressing adverse effects on coastal values and uses that are to be avoided.
48 – Taranaki District Health Board	488	Support	Accept
		Submitter notes their view that Policy 25 meets the section 5 purpose of the RMA and also requirements under the <i>Health Act 1956</i> to protect the health of the public. Retain Policy 25 of the Plan as notified.	Submitter's comments are noted. Policy 25 is retained subject to minor amendments made to offer relief to other submitters concerns where appropriate.
Further submissions – Port Taranaki Ltd (32)		Support	
58 – Te Atiawa	489	Amend	Accept
		Submitter seeks amendment to Policy 25 of the Plan to read: <i>New discharges of treated wastewater containing human sewage will not occur not be allowed in the coastal management areas: Outstanding Value, Estuaries Unmodified, Estuaries Modified and Port.</i>	Officers agree that the proposed wording provides a stronger directive for Plan users and accept the relief sought as proposed by the submitter but suggest a slight alternative to maintain consistent wording throughout the Plan but still to add strength to the policy to read: <i>New discharges of treated wastewater containing human sewage must not occur in the coastal management areas: [...]</i>
Further submissions – Te Korowai o Ngāruahine Trust (41)		Support	
Policy 26 – Improving existing wastewater discharges			
5 – Point Board Riders	490	Support	Accept
		Retain Policy 26 of the Plan seeking to improve existing wastewater discharges to coastal waters.	Support noted. Policy 26 is retained as notified.
15 – Surfbreak Protection Society	491	Support	Accept
		Retain Policy 26 of the Plan seeking to improve existing wastewater discharges to coastal waters.	Support noted. Policy 26 is retained as notified.
23 – New Plymouth District Council	492	Support	Accept
		Retain the use of the phrase “best practicable option” in Policy 26(a) of the Plan.	Support noted. Policy 26 is retained as notified.

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
40 – Te Rūnanga o Ngāti Mutunga	493	Support	Accept
		Submitter supports Policy 26 of the Plan but, in relation to Clause (b), seeks that the Taranaki Regional Council work with current consent holders to see if improvements could occur within the shortest possible time rather than allowing it to occur until the end of the current consent.	Officers note that the Council annually monitors and works with current consent holders to not only ensure compliance with consent conditions, which include regularly reassessments to ensure the current system remains the best practicable option, in light of technological advances and changing circumstances. Community involvement in the monitoring and management of these discharges, through involvement plans and stakeholder meetings, is also required in the resource consents. Through this process, improvements are expected to occur within the shortest possible time frame rather than allowing it to occur only once the current consent time has lapsed.
41 – Te Korowai o Ngāruahine Trust	494	Other	No relief necessary
		Submitter support Policy 26 of the Plan and the implementation of the best practicable option and suggests the adoption of the Plan will require a section 128 review of existing wastewater consents under the RMA.	Comments noted.
43 – Royal Forest and Bird Protection Society	495	Amend	Decline
		Submitter seeks amendment of Policy 26 of the Plan to include a new clause giving priority to improving water quality in outstanding and significant areas.	Officers note that all General Policies (Policies 1 – 21) and relevant Activity-specific Policies need to be read together. General Policies already address the protection of outstanding and significant areas with Policy 12 being particularly relevant in that it targets areas where there are wastewater discharges that have impacted on coastal water quality and where Council will be seeking a restoration of that water quality. Officers further note Policy 25 prohibits any new wastewater discharges to the coastal marine area other than the Open Coast coastal management area (i.e. no discharges to outstanding areas or estuaries).
47 – Fonterra	496	Support	Accept
		Retain Policy 26 of the Plan as notified.	Support noted. Policy 26 is retained as notified.
48 – Taranaki District Health Board	497	Support	Accept
		Retain Policy 26 of the Plan as notified.	Support noted. Policy 26 is retained as notified.
Further submissions – Port Taranaki Ltd (32)		Support	

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
58 – Te Atiawa	498	Support Submitter supports Policy 26 and the wording “no further consent will be granted”.	Accept Support noted. Policy 26 is retained as notified.
Policy 27 – Discharges of stormwater			
40 – Te Rūnanga o Ngāti Mutunga	499	Amend Submitter seeks amendment to Policy 27 of the Plan to include a new Clause (a)(vi) that reads: <i>Discharges of stormwater to the coastal marine area will be appropriately managed by:</i> <i>(a) adequate consideration of: [...]</i> <i>(vi) Location of discharge in relation to sensitive areas; [...]</i>	Accept in part Officers agree to amend Policy 27 by including a new clause that any discharge is of an acceptable quality having regard to the location of scheduled and other values sensitive to the effects of stormwater discharges. Other submitters have also submitted on this issue. Having regard to all the submissions, Officers recommend that a new Clause (a)(iiiA) be included that reads as follows: <i>Discharges of stormwater to the coastal marine area will be appropriately managed by:</i> <i>(a) adequate consideration of: [...]</i> <i>(iiiA) the location of the discharge in relation to avoiding, remedying or mitigating any adverse environmental effects;</i>
Further submissions – Te Korowai o Ngāruahine Trust (41), Te Rūnanga o Ngāti Ruanui Trust (61)		Support	
41 – Te Korowai o Ngāruahine Trust	500	Amend Submitter seeks amendment to Policy 27 of the Plan to read: <i>Discharges of stormwater to the coastal marine area will be appropriately managed by:</i> <i>(a) adequate consideration of:</i> <i>[...]</i> <i>(iii) the use of measures (which may include treatment) to prevent or minimise contamination of the receiving environment</i> AND Refer to preventing discharges to any sensitive area of sites of significance.	Accept in part Officers agree to amend Policy 27(a)(iii) as sought by the submitter and note the proposed amendments to Policy 27(a) to include a new clause that any discharge is of an acceptable quality having regard to the location of scheduled values sensitive to the effects of stormwater discharges. These changes will provide the relief sought by the submitter and read: <i>Discharges of stormwater to the coastal marine area will be appropriately managed by:</i> <i>(a) adequate consideration of: [...]</i> <i>(iii) the use of measures (which may include treatment) to prevent or minimise contamination of the receiving environment</i> <i>(iiiA) the location of the discharge in relation to avoiding, remedying or mitigating any adverse environmental effects;</i>
	501	Amend	Decline

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
43 – Royal Forest and Bird Protection Society		Submitter seeks amendment to Policy 27 of the Plan to include reference to matters set out in Policy 23(1) of the <i>New Zealand Coastal Policy Statement</i> .	Officers do not agree to the requested amendments on the basis that the issues raised are covered in a different area of the Policies section. Policy 23(1) [Discharge of contaminants] of the <i>New Zealand Coastal Policy Statement</i> is appropriately covered by Policy 22 and 23 of the Plan. Policy 27 covers the requirements set out in Policy 23(4) of the <i>New Zealand Coastal Policy Statement</i> . As noted previously, all General Policies 1 - 21 and relevant Activity-specific Policies, including both Policies 23 and 27 of the Plan, must be read together. It is officers' view that, in doing so, Plan policies collectively address the matters covered in Policy 23(1) of the <i>New Zealand Coastal Policy Statement</i> .
46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	502	Support Retain Policy 27 of the Plan as notified.	Accept Support noted. Policy 27 is retained subject to minor amendments made to offer relief to other submitters' concerns where appropriate.
Further submissions – Transpower NZ Ltd (26), Port Taranaki Ltd (32)		Support	
47 – Fonterra	503	Amend Submitter seeks amendment to Policy 27 Of the Plan to include a new Clause (d) that reads: <i>Discharges of stormwater to the coastal marine area will be appropriately managed by:</i> [...] <i><u>(d) the adoption of the best practicable option for the treatment and discharge of stormwater to the coastal marine area to minimise adverse effects.</u></i>	Accept The submitter generally supports Policy 27 but wishes to see reference to the implementation of the best practicable option for the treatment and discharge of stormwater into the coastal environment. Officers agree to the requested amendment as sought by the submitter as it provides further certainty for Plan users as to how stormwater discharges will be managed.
48 – Taranaki District Health Board	504	Support Retain Policy 27 as notified.	Accept Support noted. Policy 27 is retained subject to minor amendments made to offer relief to other submitters' concerns where appropriate.
58 – Te Atiawa	505	Amend Submitter seeks amendment to Policy 27(a)(iii) and (v) of the Plan and include a new Clause (vi) to read: <i>Discharges of stormwater to the coastal marine area will be appropriately managed by:</i> <i>(a) adequate consideration of: [...]</i>	Accept in part The submitter seeks to amend some of the wording within Policy 27 to provide more certainty for Plan users in regards to how stormwater discharge will be managed. Officers agree to amend Policy 27 by replacing the reference to "which may include" with "including treatment". However, it is not considered appropriate to remove reference to "where appropriate" from the policy as it recognises that integrated

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		<p>(iii) the use of measures (which may include including treatment) to prevent or minimize contamination of the receiving environment; [...]</p> <p>AND</p> <p>(v) integrated management of whole stormwater catchments and stormwater networks where appropriate.</p> <p>AND</p> <p><u>(vi) location of the discharge in relation to sensitive areas.</u></p>	<p>management of whole stormwater catchments and stormwater networks might not always be practicable or appropriate.</p> <p>Officers have noted the support from other submitters for the inclusion of a new clause that any discharge is having regard to the location of scheduled and other values sensitive to the effects of stormwater discharges. Other submitters have also submitted on this issue. Having regard to all the submissions, Officers recommend that a new Clause (a)(iiiA) be included that reads as follows:</p> <p><i>Discharges of stormwater to the coastal marine area will be appropriately managed by:</i></p> <p>(a) adequate consideration of: [...]</p> <p>(iii) the use of measures (which may include<u>ing</u> treatment) to prevent or minimise contamination of the receiving environment</p> <p><u>(iv) location of discharge in relation to avoiding, remedying or mitigating any adverse environmental effects;</u></p>
Further submissions – Te Korowai o Ngāruahine Trust (41), Te Rūnanga o Ngāti Ruanui Trust (61)		Support	
58 – Te Atiawa	506	<p>Amend</p> <p>Submitter seeks amendment to Policy 27(b) of the Plan to read:</p> <p><i>Discharges of stormwater to the coastal marine area will be appropriately managed by:</i></p> <p>[...]</p> <p>(b) avoiding, where practicable, and otherwise remedying <u>avoid</u> cross contamination of sewage and stormwater systems; and [...]</p>	<p>Decline</p> <p>Officers note that in some circumstances it is not always possible to avoid cross contamination of sewage and stormwater systems.</p>
Policy 28 – Harmful aquatic organisms			
9 – Karen Pratt	507	<p>Amend</p> <p>The submitter outlines the risk of offloading ballast water in productive shallow waters and seeks amendment to Policy 28 of the Plan to address ballast water.</p>	<p>Decline</p> <p>Council recognise the risk of marine pests and diseases carried in ballast water tanks that can threaten the marine environments and seafood industries. However, officers do not believe it is necessary or appropriate for Council to amend Policy 28 when this matter is already separately regulated by the Ministry for Primary Industries under the <i>Import health standard – Ballast water from all countries</i>. Any Council role in such matters represents an inappropriate duplication of the Ministry for Primary Industries regulatory role.</p>
Further submissions – Trans-Tasman Resources Ltd (6)		Oppose	
Further submissions – Nga Motu Marine Reserve Society Inc (44)		Support	
	508	Amend	Accept

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
29 – Department of Conservation		Submitter supports Policy 28 of the Plan but seek minor amendment to delete the words “and scraping” from Policy 28(a). The submitter does not believe that the inclusion of “scraping” is appropriate and prefers to refer to cleaning in a more general sense, while scraping is only one specific description of cleaning that may occur.	Officers agree that broadening the classification for cleaning is appropriate as requested.
33 – New Zealand Defence Force	509	Support Retain Policy 28 as notified.	Accept Support noted. Policy 28 is retained subject to minor amendments to remove reference to “scraping”.
Further submissions – Port Taranaki Ltd (32)		Support	
43 – Royal Forest and Bird Protection Society	510	Amend Submitter seeks amendment to Policy 28 of the Plan to include reference to an avoidance approach with the introduction of harmful aquatic organisms.	Decline The submitter is not convinced that the “ <i>minimise</i> ” risk approach adopted for Policy 28 is in line with protections under Policies 11 [Indigenous biological diversity (biodiversity)] and 13 [Preservation of natural character] of the <i>New Zealand Coastal Policy Statement</i> . The submitter seeks that an avoidance approach be introduced. Avoiding the introduction of all harmful aquatic organisms is certainly desirable but officers do not believe that a strict avoidance approach is technically achievable through RMA controls. Officers suggest avoiding the introduction of harmful aquatic organisms are matters of border control and primarily dealt with by other regulatory agencies and under other statutes such as the <i>Biosecurity Act 1993</i> . Officers recommend that the Policy retain its focus on minimising risks on the introduction or spread of harmful species.
Policy 29 – Impacts from offshore petroleum drilling and production			
6 – Trans-Tasman Resources Ltd	511	Amend Submitter seeks amendment to Policy 29 of the Plan by deleting the reference to petroleum and include all offshore drilling and production to read as follows: <i>Policy 29: impacts from offshore petroleum drilling and production</i> <i>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: [...]</i>	Accept The submitter wishes to see Policy 29 expanded to include non-petroleum related drilling and production activities. Officers agree that it would be useful to expand the scope of the Policy to cover all extractive industries, not just petroleum, particularly given recent interest in seabed mining in and adjacent to the Taranaki coastal marine area. Without broadening the scope of this Policy, such activities can be considered

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Further submissions – Taranaki Energy Watch (51)		Oppose	under the Policy where they originally have no specific activity Policy. Officers recommend granting the relief sought.
25 – New Zealand Petroleum and Minerals	512	Support Retain Policy 29 of the Plan as notified.	Accept Support noted. Policy 29 is retained subject to amendments made to offer relief to other submitters' concerns where appropriate.
Further submissions – Port Taranaki Ltd (32), Petroleum Exploration and Production Association of New Zealand (37)		Support	
40 – Te Rūnanga o Ngāti Mutunga	513	Amend Submitter seeks amendment to Policy 29 of the Plan to read: <i>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 any discharges by ensuring: [...]</i>	Accept The submitter wishes to see Policy refer to “any” discharge rather than “accidental” discharge. Officers agree that the broader coverage provided by the relief request is desirable and agree to the sought relief.
Further submissions – Taranaki Energy Watch (51), Te Rūnanga o Ngāti Ruanui Trust (61)		Support	
41 – Te Korowai o Ngāruahine Trust	514	Amend Submitter seeks amendment to Policy 29 of the Plan to remove the word “accidental”.	Accept The submitter wishes to see Policy refer to “any” discharge rather than “accidental” discharge. Officers agree that the broader coverage provided by the relief request is desirable and agree to the sought relief.
Further submissions – Taranaki Energy Watch (51), Te Rūnanga o Ngāti Ruanui Trust (61)		Support	
43 – Royal Forest and Bird Protection Society	515	Amend Submitter supports in part but seeks amendment to Policy 29 of the Plan to clarify that this policy relates to existing lawful petroleum drilling and production only and does not include new activities.	Decline Officers suggest that it is not necessary or appropriate to differentiate between existing and new oil and gas activities. The relief sought by the submitter is based upon the Government’s decision to restrict new permits to only onshore Taranaki and that there will be no new offshore oil and gas exploration permits. However, Government direction and policies regularly change over the life of any Plan. Officers consider the relief sought is an unnecessary level of detail that potentially may

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
			become dated and inaccurate should this Government or successive government's change their position. It is appropriate that the Policy focus on effects of the activity.
51 - Taranaki Energy Watch	516	Amend Submitter seeks amendment to Policy 29 of the Plan to incorporate a precautionary approach.	Decline The submitter is concerned that areas of the Plan relating to petroleum provisions do not reflect a precautionary approach, which, in their view, is required by the <i>New Zealand Coastal Policy Statement</i> . Officers suggest that a precautionary approach is already adequately provided for via Policy 3 [Precautionary approach] of the Plan. Policy 3 is a General Policy that applies to all activities, including oil and gas industries, within the coastal environment and regardless of which coastal management area the activity may fall within. Officers further note that the potential risks associated with oil and gas exploration and production activities are well understood. For this reason, it is unnecessary to repeat the provisions of Policy 3 within Policy 29. In the main oil and gas exploration and production activities in the coastal marine area are largely a Discretionary Activity or a Non Complying Activity. Therefore, through the consenting process the need to adopt a precautionary approach will be considered at that time.
Further submissions – Petroleum Exploration and Production Association of New Zealand (37)		Oppose	
Further submissions – Te Korowai o Ngāruahine Trust (41)		Support	
58 – Te Atiawa	517	Amend Submitter seeks amendment to Policy 29 of the Plan to read: <i>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 any discharges by ensuring: [...]</i>	Accept The submitter wishes to see Policy refer to “any” discharge rather than “accidental” discharge. Officers agree that the broader coverage provided by the relief request is desirable and agree to the sought relief.
Further submissions – Taranaki Energy Watch (51)		Support	
Policy 30 – Discharge of contaminants to air			
9 – Karen Pratt	518	Other Submitter seeks that the Council review Policy 30 of the Plan to consider its adequacy for addressing heavy fuel emissions resulting from any potential iron sand mining that might occur in the territorial waters.	No relief necessary The submitter has not expressly sought amendments to Policy 30 but clearly has concerns around potential adverse effects arising from heavy fuel emissions resulting from any potential iron sand mining that might occur in the territorial waters that warrant an officers' response. Officers note that in the development of the Policy 30 (and other policies) Council has carefully considered the various types and levels of use and development in the coastal marine area. Officers are satisfied that the Policy appropriately captures all
Further submissions – Trans-Tasman Resources Ltd (6)		Oppose	

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
			discharges to air in the coastal marine area, including those associated with sand mining, and provides an appropriate level of direction in the management of adverse effects.
46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	519	Support	Accept
		Retain Policy 30 of the Plan as notified.	Support noted. Policy 30 is retained as notified.
Further submissions – Port Taranaki Ltd (32)		Support	
47 – Fonterra	520	Support	Accept
		Retain Policy 30 of the Plan as notified.	Support noted. Policy 30 is retained as notified.
Policy 31 – Structures that support safe public access and use, or public or environmental benefit			
12 – Chorus New Zealand Ltd	521	Support	Accept
		Retain Policy 31 of the Plan as notified.	Support noted.
13 – Spark New Zealand Trading Ltd	522	Support	Accept
		Retain Policy 31 of the Plan as notified.	Support noted.
14 – Vodafone New Zealand Ltd	523	Support	Accept
		Retain Policy 31 of the Plan as notified.	Support noted.
26 – Transpower NZ Ltd	524	Amend	Accept
		<p>The submitter is concerned that the words “<i>will be allowed for</i>” infer resource consent approval and such wording would be interpreted as predetermining a resource consent process outcome.</p> <p>Submitter seeks amendment to Policy 31 of the Plan to read (or alternatively use the words “...to provide for”):</p> <p><i>Enable sStructures in appropriate locations will be allowed for, subject to the appropriate management of adverse effects, where the structure is to provide for [...]</i></p>	Officers note that the reference to “will be allowed for” does not predetermine the consent process outcome, however, to allay the submitter’s concerns and to avoid the potential risk for confusion, Officers recommend granting the relief sought as the intention and direction of the Policy is unchanged by the amendment, however, recommend using “allow” instead of “enable” as it is not the Councils mandate to enable but allow, where appropriate, such activities.
Further submissions – Port Taranaki Ltd (32)		Support	

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
43 – Royal Forest and Bird Protection Society	525	Support	Accept
		Support in part Policy 31 of the Plan but seek consequential amendments to Policy 5 [Appropriate use and development] and other policies to give effect to Policies 11, 13 and 15 of the <i>New Zealand Coastal Policy Statement</i> to clarify appropriate locations.	Support noted. Refer to submission point 280 in relation to officers' response to reliefs sought in relation to Policy 5.
45 – Powerco	526	Support	Accept
		Retain Policy 31 of the Plan as notified.	Support noted. Policy 31 is retained subject to minor amendments made to offer relief to other submitters where appropriate.
46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	527	Support	Accept
		Retain Policy 31 of the Plan as notified.	Support noted. Policy 31 is retained subject to minor amendments made to offer relief to other submitters where appropriate.
59 – KiwiRail	528	Support	Accept
		Retain Policy 31(d) of the Plan as notified.	Support noted. Policy 31 is retained subject to minor amendments made to offer relief to other submitters where appropriate.
Policies 31 to 39 – Structures			
41 – Te Korowai o Ngāruahine Trust	529	Amend	No relief necessary
		Submitter seeks amendment to Policies 31 to 39 [Structures] of the Plan to recognise the <i>Takutai Moana Act 2011</i> and the extent to which structures prejudice Māori customary and protected rights along the coastline and to include references to Schedule 5B [Sites of significance].	Note Policy 32(d)(iv) already includes reference to structures being designed, located and managed so as to avoid, remedy or mitigate adverse effects on the environment and associated uses and values. Further policy direction is provided in Policies 15 [Historic heritage] and 16 [Relationship of tangata whenua] that direct how effects on sites of significance need to be managed. Both policies (plus any other relevant General Policies) must be read to together. Officers do not consider it necessary to repeat the provisions of another policy as it will not provide greater protection than is already given. Reference to Schedule 5B is also given in the appropriate policies.
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Support	
58 – Te Atiawa	530	Amend	No relief necessary
		Submitter seeks amendment to Policies 31 to 39 [Structures] of the Plan to include reference to Schedule 5B (and recognition of the <i>Takutai Moana Act 2011</i>) to provide assurance that structures are not placed within the sites of significance.	Note Policy 32(d)(iv) already includes reference to structures being designed, located and managed so as to avoid, remedy or mitigate adverse effects on the environment and associated uses and values. Further policy direction is provided in Policies 15 [Historic heritage] and 16 [Relationship of tangata whenua] that direct how effects on

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Support	sites of significance need to be managed. Both policies (plus any other relevant General Policies) must be read to together. Officers do not consider it necessary to repeat the provisions of another policy as it will not provide greater protection than is already given. Reference to Schedule 5B is also given in the appropriate policies.
Policy 32 – Placement of structures			
6 – Trans-Tasman Resources Ltd	531	Support	Accept
		Submitter supports the recognition in Policy 32(e) of the Plan that in some circumstances it is not appropriate to make structures available for public or multiple use.	Support noted. Policy 32(e) is retained as notified.
12 – Chorus New Zealand Ltd	532	Support	Accept
		Retain Policy 32 of the Plan as notified.	Policy 32 retained with minor amendment to Policy 32 (a) as discussed in submission point 532.
13 – Spark New Zealand Trading Ltd	533	Support	Accept
		Retain Policy 32 of the Plan as notified.	Support noted. Policy 32 is retained subject to minor amendments made to offer relief to other submitters where appropriate.
Further submissions – Port Taranaki Ltd (32)		Support	
14 – Vodafone New Zealand Ltd	534	Support	Accept
		Retain Policy 32 of the Plan as notified.	Support noted. Policy 32 is retained subject to minor amendments made to offer relief to other submitters where appropriate.
26 – Transpower NZ Ltd	535	Amend	Accept
		Submitter seeks amendment to Policy 32(a) of the Plan to read: <i>Structures in the coastal marine area:</i> <i>(a) will generally be limited to those that have a functional need or technical, operational and/or locational requirement 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; [...]</i>	The submitter wishes to clearly recognise the technical, operational and/or locational requirement for an activity to be located in the coastal marine area. Officers agree to amend Policy 32(a) to include reference to “technical operational and/or locational requirement” as requested. This amendment will give effect to Policy 3 of the <i>New Zealand Coastal Policy Statement</i> which requires consideration of the constraints imposed by technical and operational requirements.
37 – Petroleum Exploration and	536	Amend	Accept
		Submitter seeks amendment to Policy 32(f) of the Plan to read:	

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Production Association of NZ		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.	The submitter seeking a more directive approach with regards to Policy 32(f). The current wording is considered subjective and it is suggested that the proposed relief would provide clarity to the policy. Officers agree and recommend granting the relief sought.
Further submissions – Taranaki Energy Watch (51)		Support in part	
41 – Te Korowai o Ngāruahine Trust	537	Amend Submitter seeks amendment to Policy 32 of the Plan to include reference to Schedule 5B and ensure that structures are not placed within the sites of significance.	Decline The submitter would preclude the placement of any structure within sites of significance. Given that structures may occur at various scales, in various forms, and purposes (including beneficial), and that the placement of the structure within sites of significance will not necessarily have adverse effects on this site (recognising that some structures may also be a site of significance, e.g. tauranga waka, or facilitate Māori customary uses e.g. mahinga kai), Officers recommend no change. Officers note that Policy 32 must be read in conjunction with each other relevant policies, including all the General Policies. Reference to Schedule 5B is appropriately referenced within Policy 15 and would require any structure to avoid significant adverse effects, and avoid, remedy and mitigate any other adverse effects on the values associated with sites of significance to Māori identified in Schedules 5A and 5B.
Further submissions – Te Atiawa (58), Te Rūnanga o Ngāti Ruanui Trust (61)		Support	
43 – Royal Forest and Bird Protection Society	538	Amend Submitter seeks amendment to Policy 32 of the Plan to clarify that this policy is subject to the protective policies giving effect to the <i>New Zealand Coastal Policy Statement</i> AND Amend Policy 32(d) to read: Structures in the coastal marine area: [...] (d) will be designed, located and managed: <u>A. to avoid adverse effects in accordance with policies 8, 9, 14 [list policies that give effect to Policies 11, 13 and 15 of the New Zealand Coastal Policy Statement]; and</u>	Decline Section 5.1 explains that the policies apply to all activities within the coastal environment, regardless of which coastal management area the activity may fall within. Thus, Policy 32 must be read in conjunction with each of the other relevant policies, including all the General Policies. Together these policies address the matters covered in the <i>New Zealand Coastal Policy Statement</i> . Officers decline the relief sought on the basis that the issue raised by the submitter has already been covered within other provisions of the Plan.

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		<u>B.</u> so as to avoid, remedy or mitigate: (i) any [...].	
45 – Powerco	539	Support Retain Policy 32 of the Plan as notified.	Accept Support noted. Policy 32 is retained subject to minor amendments made to offer relief to other submitters where appropriate.
46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	540	Support Retain Policy 32 of the Plan as notified.	Accept Support noted. Policy 32 is retained subject to minor amendments made to offer relief to other submitters where appropriate.
47 – Fonterra	541	Amend Submitter support Policy 32 recognising and providing for structures in the coastal marine area that have an operational requirement to be located in the coastal environment but seeks amendment so that Policy 32(a) is not limited to those activities that have a functional need only. Submitter seeks amendment to Policy 32(a) of the Plan to read: <i>Structures in the coastal marine area:</i> (a) will generally be limited to those that have a functional need or operational requirement 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; [...]	Accept Officers agree with the submitter to amend the Policy to cover “operational needs” alongside “functional needs”. The amended Policy would provide for structures that are not required to be located within the coastal marine area, however, their operational requirements or constraints justify their presence there. In order to maintain consistency throughout the Plan alternative wording is suggested to read: <i>Structures in the coastal marine area:</i> (a) must generally be limited to those that have a functional need or technical, operational and/or locational requirement 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;
Further submissions – Trans-Tasman Resources Ltd (6)		Support	
57 – Heritage New Zealand	542	Amend The submitter identifies that the placement of structures has the potential to adversely affect historic heritage and wishes to include cross-reference to Policy 15 [Historic heritage] within Policy 32. Submitter seeks amendment to Policy 32 of the Plan to manage potential adverse effects of the placement of hard protection structures to historic heritage by adding a further point: <u>(g) will manage adverse effects on historic heritage in accordance with Policy 15.</u>	Decline Section 5.1 explains that the policies apply to all activities within the coastal environment, regardless of which coastal management area the activity may fall within. Thus, Policy 32 must be read in conjunction with each of the other relevant policies, including all the General Policies. Together these policies address the matters covered in the <i>New Zealand Coastal Policy Statement</i> . Officers recommend declining the relief sought as historic heritage matters are already adequately addressed under other provisions of the Plan.
Policy 33 – Hard protection structures in coastal areas of outstanding value			

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
43 – Royal Forest and Bird Protection Society	543	Amend	Decline The submitter does not believe that all of the values or characteristics contributing to the outstanding natural character of the identified areas are identified within Schedule 2. Therefore, the policy is limited to only providing for those identified in Schedule 2 and not achieving the appropriate protection required by Policies 11, 13 and 15 of the <i>New Zealand Coastal Policy Statement</i> . Officers agree that there are broader considerations than just those values identified in Schedule 2, however, these considerations are separately provided for under other General Polices of the Plan that, in turn, give effect to Policies 11, 13 and 15 of the <i>New Zealand Coastal Policy Statement</i> . The wording of Policy 33 is consistent with Policy 8 [Areas of outstanding value] of the Plan in that the avoidance of adverse effects relates to specific scheduled values identified.
		Submitter seeks amendment to 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, <u>including those</u> identified in Schedule 2, that contribute to an area having outstanding value, in accordance with Policy 8.</i>	
Further submissions – Port Taranaki Ltd (32)		Oppose	
NEW Policy 33A			
43 – Royal Forest and Bird Protection Society	544	Amend	Decline Section 5.1 explains that the policies apply to all activities within the coastal environment, regardless of which coastal management area the activity may fall within. Thus, Policy 33 must be read in conjunction with each of the other relevant policies, including all the General Policies. Together these policies address the matters covered in the <i>New Zealand Coastal Policy Statement</i> . Officers recommend declining the relief sought as such matters are already adequately addressed under other provisions of the Plan and do not require repeating.
		Submitter seeks amendment to the 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.	
Further submissions – Port Taranaki Ltd (32)		Oppose	
Policy 34 – Appropriateness of hard protection			
47 – Fonterra	545	Amend	Accept in part The Council is seeking to manage the risk of hard protection works becoming more prevalent along the Taranaki coastline with associated risks that coastal natural character, amenity values and public access is degraded over time. Accordingly, Policy 34 seeks to generally discourage the use of hard protection structures in the coastal marine area. The submitter has highlighted an issue whereby Policy reference to “regionally important infrastructure” is problematic in that it excludes some activities and arguably repeats consideration matters covered in Clause (e), which refers to the national and regional importance of existing infrastructure, use or value at threat.
		Submitter seeks to expand Policy 34 to include regionally important “ <i>industry</i> ” alongside infrastructure in order to encompass the hard protection structures of industries within the region. Submitter seeks amendment to Policy 34 of the Plan 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>	

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
			Officers propose an alternative relief whereby reference to regionally important infrastructure (and its limited scope) is deleted and instead the Policy will rely on Clause (c) which has a much broader application and would cover the hard protection structure that would encompass protecting the Whareroa discharge outfall.
57 – Heritage New Zealand	546	Amend Submitter seeks amendment to Policy 34 of the Plan to read: <i><u>(h) the management of adverse effects on historic heritage in accordance with Policy 15.</u></i>	Decline The submitter identifies that the placement of hard protection structures has the potential to adversely affect historic heritage and wishes to include cross-reference to Policy 15 [Historic heritage] within Policy 34. Section 5.1 explains that the policies apply to all activities within the coastal environment, regardless of which coastal management area the activity may fall within. Thus, Policy 33 must be read in conjunction with each of the other relevant policies, including all the General Policies. Together these policies address the matters covered in the <i>New Zealand Coastal Policy Statement</i> . Officers recommend declining the relief sought as such matters are already adequately addressed under other provisions of the Plan and does not require repeating.
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Support	
59 – KiwiRail	547	Support Retain Policy 34(c) of the Plan as notified.	Accept Support noted. Policy 34 is retained subject to minor amendments made to offer relief to other submitters where appropriate.
Further submissions – Port Taranaki Ltd (32)		Support	
Policies 34 and 35 – Hard protection structures			
43 – Royal Forest and Bird Protection Society	548	Amend Submitter seeks amendment to Policies 34 and 35 of the Plan (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 Seek amendment to Policy 35 of the Plan to ensure protection is also given under Policies 8 and 9 of the Plan.	Decline Section 5.1 explains that the policies apply to all activities within the coastal environment, regardless of which coastal management area the activity may fall within. Thus, Policy 33 must be read in conjunction with each of the other relevant policies, including all the General Policies. Together these policies address the matters covered in the <i>New Zealand Coastal Policy Statement</i> . Officers recommend declining the relief sought as such matters are already adequately addressed under other provisions of the Plan and does not require repeating.
Further submissions – Department of Conservation (29), Port Taranaki Ltd (32)		Oppose	

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Further submissions – Te Korowai o Ngāruahine Trust (41)		Support	
Policy 35 – Temporary hard protection structures			
60 Te Kaahui o Rauru	549	<p>Amend</p> <p>Submitter seeks amendment to Policy 35 of the Plan to include a definition of “permanent”.</p>	<p>Accept</p> <p>Officers recommend amending Policy 35(c) so that it no longer refers to “permanent”. The revised Policy (c) would read as follows:</p> <p><i>Temporary hard protection structures with a duration of less than five years may be allowed provided that: [...]</i></p> <p>(c) no permanent any adverse effects on the environment will result resulting from the placement, use and removal of the structure, will be less than minor and transitional.</p>
Policy 36 – Maintenance, repair, replacement and minor upgrading of existing structures			
12 – Chorus New Zealand Ltd	550	<p>Support</p> <p>Retain Policy 36 of the Plan as notified.</p>	<p>Accept</p> <p>Support noted. Policy 36 is retained subject to amendments made in order to offer relief to other submitters concerns where appropriate.</p>
13 – Spark New Zealand Trading Ltd	551	<p>Support</p> <p>Retain Policy 36 of the Plan as notified.</p>	<p>Accept</p> <p>Support noted. Support noted. Policy 36 is retained subject to amendments made in order to offer relief to other submitters' concerns where appropriate.</p>
Further submissions – Port Taranaki Ltd (32)		Support	
14 – Vodafone New Zealand Ltd	552	<p>Support</p> <p>Retain Policy 36 of the Plan as notified.</p>	<p>Accept</p> <p>Support noted. Support noted. Policy 36 is retained subject to amendments made in order to offer relief to other submitters' concerns where appropriate.</p>
43 – Royal Forest and Bird Protection Society	553	<p>Support</p> <p>Submitter seeks amendment to Policy 36 of the Plan to read:</p> <p><i>Maintenance, repair, replacement and minor upgrading of existing lawful structures and reclamations will be allowed:</i></p> <p><i>a). where it does not increase the scale or significance of the effects of the activity or structure; and</i></p>	<p>Accept</p> <p>Officers agree with the submitter that it is necessary to ensure that, in providing for the maintenance, repair, replacement and minor upgrading of existing lawful structures and reclamations in the coastal marine area, the scale of effects of those activities are not increased.</p> <p>Officers recommend amending Policy 36 as sought by the submitter under clause (b).</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		<i>b). in order to: (i) enable compliance [...]</i>	
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Support	
45 – Powerco	554	Support Retain Policy 36 of the Plan as notified.	Accept Support noted. Policy 36 is retained subject to amendments made in order to offer relief to other submitters' concerns where appropriate.
46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	555	Support Retain Policy 36 of the Plan as notified.	Accept Support noted. Policy 36 is retained subject to amendments made in order to offer relief to other submitters' concerns where appropriate.
47 – Fonterra	556	Support Retain Policy 36 of the Plan as notified.	Accept Support noted. Policy 36 is retained subject to amendments made in order to offer relief to other submitters' concerns where appropriate.
59 – KiwiRail	557	Support Retain Policy 36 of the Plan as notified.	Accept Support noted. Policy 36 is retained subject to amendments made in order to offer relief to other submitters' concerns where appropriate.
Policy 37 – Alterations or extensions of existing structures			
12 – Chorus New Zealand Ltd	558	Support Retain Policy 37 of the Plan as notified.	Accept Support noted.
13 – Spark New Zealand Trading Ltd	559	Support Retain Policy 37 of the Plan as notified.	Accept Support noted.
Further submissions – Port Taranaki Ltd (32)		Support	
14 – Vodafone New Zealand Ltd	560	Support Retain Policy 37 of the Plan as notified.	Accept Support noted.

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
43 – Royal Forest and Bird Protection Society	561	<p>Amend</p> <p>Submitter seeks amendment to Policy 37 of the Plan to read: <i>Major alteration or extension of existing lawful structures will be <u>considered allowed</u> in <u>appropriate</u> locations where the activity will <u>avoid adverse effects consistent with protection required under policies 8, 9 and 14, and where the activity will not have significant adverse effects on other <u>lawfully established structures</u> or uses, and <u>alteration or extension values and</u> will: [...]</u></i></p>	<p>Accept in part</p> <p>The submitter does not consider Policy 37 to meet the requirements of Policy 11(a) [Indigenous biological diversity], 13(1)(a) [Preservation of natural character] or 14(a) [Restoration of natural character] of the <i>New Zealand Coastal Policy Statement</i>.</p> <p>Officers note that Policy 37 must be read in conjunction with each other of the relevant policies, including all the General Policies. Together these policies address the matters sought by the submitter and are sufficient to achieve the requirements set out within the <i>New Zealand Coastal Policy Statement</i>.</p> <p>However, officers do agree to amend the policy to include “<i>lawfully established structures</i>” as requested by the submitter as this provides greater detail for Plan users, to read:</p> <p><i>Major alteration or extension of existing lawful structures will be allowed in locations where the activity will not have significant adverse effects on other <u>lawfully established structures or uses and values and</u> will: [...]</i></p>
45 – Powerco	562	<p>Amend</p> <p>Submitter seeks amendment to Policy 37 of the Plan to read: Major a<i>Alteration or extension of existing lawful structures, <u>including major alterations or extensions</u>, will be allowed in locations where the activity will not have significant adverse effects on other uses and values and will [...]</i></p>	<p>Accept</p> <p>The submitter wishes to extend the Policy to all alterations or extensions of structures in the coastal marine area, not just major alterations or extensions. Officers agree with the submitter as the relief sought better captures the policy intent and provides clarity for Plan users.</p>
Further submissions – Petroleum Exploration and Production Association of New Zealand (37)		Support	
Further submissions – Fonterra (47)		Support in part	
46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	563	<p>Amend</p> <p>Submitter seeks amendment to Policy 37 of the Plan to read: Major a<i>Alteration or extension of existing lawful structures, <u>including major alterations or extensions</u>, will be allowed in locations where the activity will not have significant adverse effects on other uses and values and will [...]</i></p>	<p>Accept</p> <p>The submitter wishes to extend the Policy to all alterations or extensions of structures in the coastal marine area, not just major alterations or extensions. Officers agree with the submitter as the relief sought better captures the policy intent and provides clarity for Plan users.</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Further submissions – Petroleum Exploration and Production Association of New Zealand (37)		Support	
Policy 38 – Removal of coastal structures			
12 – Chorus New Zealand Ltd	564	Support Retain Policy 38 of the Plan as notified.	Accept Support noted. Policy 38 is retained subject to amendments made to offer relief to other submitters' concerns where appropriate.
13 – Spark New Zealand Trading Limited	565	Support Retain Policy 38 of the Plan as notified.	Accept Support noted. Policy 38 is retained subject to amendments made to offer relief to other submitters' concerns where appropriate.
14 – Vodafone New Zealand Ltd	566	Support Retain Policy 38 of the Plan as notified.	Accept Support noted. Policy 38 is retained subject to amendments made to offer relief to other submitters' concerns where appropriate.
25 – New Zealand Petroleum and Minerals	567	Amend Submitter seeks amendment to Policy 38 of the Plan 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:</i> [...] <i>(d) the removal of the structure poses unreasonable costs or is technically unfeasible; or</i> <i>(e) the removal of the structure poses unreasonable risk on human health and safety.</i>	Accept The submitter is concerned that the Policy is limiting and does not allow for other matters such as unreasonable costs or health and safety concerns to be considered alongside environmental effects as exceptions to removal. The Policy does not explicitly provide for the use of industry best practice tools to determine the best practicable environmental outcome. Officers note that removal of a structure are generally considered at the time of the application of a consent and with the consent being granted once the technical, financial and safety aspects have been considered. However, some older structures may have received consents before this became standard practice. It is therefore considered appropriate to ensure that the Council is not trying to require structures to be removed where it would be technically unfeasible, the costs would be unreasonable, and/or there would be a risk to human health and safety. Officers recommend granting the relief sought by the submitter.
Further submissions – Trans-Tasman Resources Ltd (6)		Support in part	

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Further submissions – Department of Conservation (29), Te Rūnanga o Ngāti Mutunga (40)		Oppose	
Further submissions – Petroleum Exploration and Production Association of New Zealand (37)		Support	
32 – Port Taranaki	568	Amend Submitter seeks amendment to Policy 38 of the Plan to provide an exception to this policy for new port structures intended to be permanent.	Accept Officers recommend amending Policy 38 to have a new Clause (c) to allow applications to abandon material in situ or elsewhere in the coastal marine area where the structure, or part of the structure, is intended to be permanent, e.g. new Port structures.
37 – Petroleum Exploration and Production Association of NZ	569	Amend Submitter seeks amendment to Policy 38 of the Plan to read: Structures will be removed from the coastal marine area at the expiry of their authorisation or at the end of their useful life, unless Applications to abandon material in situ or elsewhere in the coastal marine area can be made if one or more of the following applies [...]	Accept The submitter has issue with Policy 38 in that the original wording is arguably ambiguous and could mean that the Council imposes a requirement to leave if an item on the list is triggered. The submitter recommends some word changes to clarify the Policy's intent. Officers recommend granting the relief sought by the submitter.
Further submissions – Te Rūnanga o Ngāti Mutunga (40), Te Atiawa (58)		Oppose	
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Support	
37 – Petroleum Exploration and Production Association of NZ	570	Amend Submitter seeks amendment to Policy 38 to include the following considerations (from the International Maritime Organisation's 1989 guidelines): <i>1 any potential effect on the safety of surface or subsurface navigation, or of other uses of the sea;</i> <i>2 the rate of deterioration of the material and its present and possible future effect on the marine environment;</i> <i>3 the potential effect on the marine environment, including living resources;</i> <i>4 the risk that the material will shift from its position at some future time;</i>	Accept The submitter wishes additional factors to be considered when applying to leave materials <i>in situ</i> . The submitter suggests this would be in line with the direction of the Central Government's proposed policy for structures in the exclusive economic zone and also with the International Maritime Organisation's 1989 guidelines and include consideration of costs, technical feasibility and health and safety risks. Officers recommend the following amendments to the Policy as follows: <i>Decommissioning and removal of any new structure must be planned for as part of the initial design and installation.</i>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		<p>5 the costs, technical feasibility, and risks of injury to personnel associated with removal of the installation or structure, and</p> <p>6 the determination of a new use or other reasonable justification for allowing the installation or structure or parts thereof to remain on the sea-bed</p>	<p><u>Applications to abandon material in situ or elsewhere in the coastal marine area can be made if one or more of the following applies:</u></p> <p>a) removal of the structure would cause greater adverse effects on the environment than leaving it in place;</p> <p>b) the structure is an integral part of an historic heritage site or landscape;</p> <p><u>c) the structure, or part of the structure, is permanent or has reuse value that is considered appropriate in accordance with Policy 5;</u></p> <p><u>d) the removal of the structure poses unreasonable costs or is technically unfeasible;</u> <u>or</u></p> <p><u>e) the removal of the structure poses unreasonable risk on human health and safety.</u></p>
Further submissions – Te Atiawa (58)		Oppose	
37 – Petroleum Exploration and Production Association of NZ	571	<p>Amend</p> <p>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.</p>	<p>Decline</p> <p>The submitter is unclear about what the expectation will be with respect to planning for decommissioning and removal. It is sought that the Policy be clarified to allow for a description of general principles and options for decommissioning and removal of new structures to provide clarity to users that a detailed decommissioning plan is not required at the time of applications for new structures.</p> <p>Officers suggest that the Policy provides adequate direction and guidance on the Council's expectations that, as part of the consenting process, applicants need to consider and address Council's general expectation is that structures in the coastal marine area will be decommissioned and removed after they have served their stated purpose. The submitter has not identified what principles and options they consider appropriate to be included in Plan provisions. However, it is officers' view that the detail describing general principles and options for decommissioning the removal of new structures in the coastal marine area is not necessary to be included in the Policy itself and are matters of detail that are more appropriately addressed through the consenting process.</p>
41 – Te Korowai o Ngāruahine Trust	572	<p>Support</p> <p>Submitter supports presumption in Policy 38 of the Plan that coastal structures will be removed.</p>	<p>Accept</p> <p>Support noted. Policy 38 is retained subject to amendments made to offer relief to other submitters' concerns where appropriate.</p>
Further submissions – Te Atiawa (58)		Support	
	573	Support	Accept

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
43 – Royal Forest and Bird Protection Society		Retain Policy 38 of the Plan as notified.	Support noted. Policy 38 is retained subject to amendments made to offer relief to other submitters' concerns where appropriate.
45 – Powerco	574	Support Retain Policy 38 of the Plan as notified.	Accept Support noted. Policy 38 is retained subject to amendments made to offer relief to other submitters' concerns where appropriate.
Further submissions – Fonterra (47)		Support	
46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	575	Support Retain Policy 38 of the Plan as notified.	Accept Support noted. Policy 38 is retained subject to amendments made to offer relief to other submitters' concerns where appropriate.
58 – Te Atiawa	576	Amend Submitter seeks amendment to Policy 38 of the Plan to read: <i>Decommissioning and removal of any new structure will must be planned for as part of the initial design and installation.</i> <i>Structures will must be removed from the coastal marine area at the expiry of their authorisations or at the end of their useful lives, unless one or more of the following applies:</i>	Accept The use of terms with similar meanings such as “ <i>must</i> ”, “ <i>will</i> ” and “ <i>shall</i> ” has been alternatively adopted throughout many second generation planning documents, including national policy statements and regional plans. A number of submitters have identified they prefer the term “ <i>must</i> ”, instead of “ <i>will</i> ” in relevant policies. Some have argued that the use of the term “ <i>must</i> ” is more legally robust. Officers have no objection to making the change noting that the policy intent of this Policy is that the activity needs to comply with the provision.
Policy 39 – Occupation			
6 – Trans-Tasman Resources Ltd	577	Support Retain Policy 39 of the Plan as notified.	Accept Support noted. Policy 39 is retained as notified.
43 – Royal Forest and Bird Protection Society	578	Support Retain Policy 39 of the Plan as notified.	Accept Support noted. Policy 39 is retained as notified.
45 - Powerco	579	Support Retain Policy 39 of the Plan as notified.	Accept Support noted. Policy 39 is retained as notified.
46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	580	Support Retain Policy 39 of the Plan as notified.	Accept Support noted. Policy 39 is retained as notified.

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Policy 40 – Disturbance, deposition and extraction in marine protected areas			
41 – Te Korowai o Ngāruahine Trust	581	Amend Submitter seeks amendment to Policy 40 of the Plan so that it includes marine areas that sometime in the future may also be designated for legal protection.	Accept The submitter wishes to expand the protections of Policy 40 to provide for changes that may occur over the life of the Plan, in particular, any future area designated for legal protection. Officers recommend granting the relief sought by amending Policy 40 to read: <i>Disturbance of, or deposition on, the foreshore or seabed or the extraction of natural material will not occur in <u>areas managed or held under other Acts for statutory protection (including Parininihi Marine Reserve, Ngā Motu/Sugar Loaf Islands Marine Protected Area and Tapuai Marine Reserve identified in Schedule 1) apart from that associated with: [...]</u></i>
Further submissions – Te Rūnanga o Ngāti Mutunga (40), Te Atiawa (58)		Support	
43 – Royal Forest and Bird Protection Society	582	Support Retain Policy 40 of the Plan as notified.	Accept Support noted. Policy 40 is retained subject to minor amendments made to offer relief to other submitters' concerns where appropriate.
Further submissions – Port Taranaki Ltd (32)		Support	
Policy 41 – Provision for disturbance, deposition or extraction activities that provide public or environmental benefit			
26 – Transpower NZ Ltd	583	Amend Submitter seeks amendment to Policy 41(g) of the Plan to read: <i>Disturbance, deposition or extraction that is necessary to protect, or maintain or develop the safe and efficient operation of nationally and regionally important infrastructure or provide for public or environmental benefit will be allowed for enabled, subject to appropriate management of adverse effects, including: [...]</i> <i>(g) operating, maintaining, repairing, or upgrading, or development of lawful structures or infrastructure; [...]</i>	Accept in part The submitter wishes Policy 41 to provide for the consideration of new infrastructure (development) within the Policy, which would give effect to Policy 1 and 2 of the National Policy Statement for Electricity Transmission. Officers recommend amending the Policy 41 in a manner that gives effect to the relief sought by the submitter, however, is worded to read: <i>Disturbance, deposition or extraction that is necessary to provide for public or environmental benefit, <u>including protecting or maintaining the safe and efficient operation of nationally and regionally important infrastructure</u>, will be allowed, subject to appropriate management of adverse effects, including: [...]</i> <i>(g) operating, maintaining, repairing, or altering or extending lawful structures or infrastructure</i>
	584	Support	Accept

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
29 – Department of Conservation		Retain Policy 41 of the Plan as notified.	Support noted. Policy 41 is retained subject to minor amendments made to offer relief to other submitters' concerns where appropriate.
59 - KiwiRail	585	Support	Accept
		Retain Policy 41 of the Plan as notified.	Support noted. Policy 41 is retained subject to minor amendments made to offer relief to other submitters' concerns where appropriate.
Further submissions – Port Taranaki Ltd (32)		Support	
43 – Royal Forest and Bird Protection Society	586	Amend	Decline
		Submitter seeks amendment to Policy 41 of the Plan to clarify that natural values includes significant indigenous biodiversity consistent with Policy 14.	The submitter is concerned that Policy 41, as currently worded, implies a potential for trading off adverse effects on some environmental values to enhance others and where the activity is for public benefit. The submitter considers “ <i>appropriate management</i> ” uncertain and is concerned that this Policy is in conflict with Policy 14 [Indigenous biological diversity]. Officers note that the policy direction to enable disturbance, deposition or extraction activities that provide public or environmental benefit is subject to the appropriate management of adverse effects. This requires the activity to be managed in a manner consistent with the directions set out in the General Policies 1 to 21. Policy 41 must be read in conjunction with each other of the relevant policies, including all the General Policies. Together these policies address the matters sought by the submitter, including those relating to the protection of significant indigenous biodiversity.
45 – Powerco	587	Support	Accept
		Retain Policy 41 of the Plan as notified.	Support noted. Policy 41 is retained subject to minor amendments made to offer relief to other submitters concerns where appropriate.
Policy 42 – Disturbance of the foreshore and seabed			
12 – Chorus New Zealand Ltd	588	Support	Accept
		Retain Policy 42 of the Plan as notified.	Support noted. Policy 42 is retained as notified.
13 – Spark New Zealand Trading Ltd	589	Support	Accept
		Retain Policy 42 of the Plan as notified.	Support noted. Policy 42 is retained as notified.

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Further submissions – Port Taranaki Ltd (32)		Support	
14 – Vodafone New Zealand Ltd	590	Support	Accept
		Retain Policy 42 of the Plan as notified.	Support noted. Policy 42 is retained as notified.
37 – Petroleum Exploration and Production Association of NZ	591	Support	Accept
		Retain Policy 42 of the Plan as notified.	Support noted. Policy 42 is retained as notified.
41 – Te Korowai o Ngāruahine Trust	592	Other	No relief necessary
		Submitter seeks confirmation that Policy 42 of the Plan does not relate to commercial activity.	<p>The submitter is not seeking a change to the Plan but presumes that the Policy does not apply to large-scale commercial activities (and their appropriateness) in the coastal marine area.</p> <p>Officers note that neither the policies, nor the rules, differentiate activities according to whether or not they are a commercial activity. Instead, they focus on the range of effects that the activity will result in. This is considered appropriate and a better management practice than merely regulating the activities for commercial ventures. Notwithstanding the above, officers note that large scale commercial activities that cause disturbance of the foreshore and seabed will generally be of a scale or type that trigger certain rules. However, even small commercial activities and non-commercial activities can be of a size, type or in a location that need to be managed in a manner that has regard to the sensitivity of the site specific values present plus the other matters set out in Policy 42. It is, therefore, preferable not to limit any policies or rules to commercial activities only and a broader approach captures all activities.</p>
43 – Royal Forest and Bird Protection Society	593	Amend	Decline
		Submitter seeks amendment to Policy 42 of the Plan to ensure activities avoid adverse effects as required by Policies 11, 13 and 15 of the <i>New Zealand Coastal Policy Statement</i> .	<p>Officers recognise the concern of the submitter but suggest that their concerns have already been provided for within the Plan.</p> <p>As stated in the preamble of Section 5.1, Policy 42 must be read in conjunction with each of the other relevant policies, including all the General Policies and Policies 11, 13 and 15. Together these policies address the matters sought by the submitter, including those relating to the protection of significant indigenous biodiversity It is not</p>
Further submissions – Trans-Tasman Resources Ltd (6)		Neutral	

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
			necessary to refer to indigenous biodiversity throughout the Policies when a standalone Policy provides the required protection already.
55 – Kiwis Against Seabed Mining	594	Amend Submitter seeks amendment to Policy 42 of the Plan, as the interpretation of “disturbance” does not relate to commercial activity.	Decline Officers note that neither the policies, nor the rules, differentiate activities according to whether or not they are a commercial activity. Instead, Plan provisions focus on the range of effects that the activity will result in. This is considered appropriate and a better management practice than merely regulating the activities for commercial ventures. Notwithstanding the above, officers note that commercial activities that cause disturbance of the foreshore and seabed will generally be of a scale or type that trigger certain rules. However, even small commercial activities and non-commercial activities can be of a size, type or in a location that need to be managed in a manner that has regard to the sensitivity of the site specific values present plus the other matters set out in Policy 42. It is, therefore, preferable not to limit any policies or rules to commercial activities only and a broader approach captures all activities.
Further submissions – Trans-Tasman Resources Ltd (6)		Oppose	
56 – Greenpeace	595	Amend Submitter seeks amendment to Policy 42 of the Plan as the interpretation of “disturbance” does not relate to commercial activity.	Decline The submitter is seeking amendment to Policy 42 to exclude large-scale commercial activities (and their appropriateness) in the coastal marine area. Officers note that neither the policies, nor the rules, differentiate activities according to whether or not they are a commercial activity. Instead, Plan provisions focus on the range of effects that the activity will result in. This is considered appropriate and a better management practice than merely regulating the activities for commercial ventures. Notwithstanding the above, officers note that commercial activities that cause disturbance of the foreshore and seabed will generally be of a scale or type that trigger certain rules. However, even small commercial activities and non-commercial activities can be of a size, type or in a location that need to be managed in a manner that has regard to the sensitivity of the site specific values present plus the other matters set out in Policy 42. It is, therefore, preferable not to limit any policies or rules to commercial activities only and a broader approach captures all activities.
Further submissions – Trans-Tasman Resources Ltd (6)		Oppose	
57 – Heritage New Zealand	596	Amend Submitter seeks amendment to Policy 42 of the Plan to read: <i>Activities that cause disturbance of the foreshore or seabed will:</i>	Decline Officers recognise the concern of the submitter but suggest that their concerns have already been provided for within the Plan.

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		[...] (c) avoid, remedy or mitigate other adverse effects – <u>including adverse effects on historic heritage (refer to Policy 15)</u> ; and [...]	As stated in the preamble of Section 5.1, Policy 42 must be read in conjunction with each of the other relevant policies, including all the General Policies and Policy 15. Together these policies address the matters sought by the submitter, including those relating to the protection of significant indigenous biodiversity. It is not necessary to refer to indigenous biodiversity throughout the Policies when a standalone Policy provides the required protection already.
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Support	
58 – Te Atiawa	597	Other Submitter seeks confirmation that the disturbance referred to in Policy 42 of the Plan is covered by Policies 40, 41, 43 and 44 and does not relate to commercial activity.	No relief necessary The submitter seeks confirmation that disturbance referred to in Policy 42 is covered by Policies 40, 41, 43 and 44. Officers note that which policies apply will depend upon the activity (e.g. if the activity is not occurring in the Port then Policy 43 does not apply). However, all policies must be read together. All General Policies 1 to 21 plus any relevant Activity-specific Policies will be considered together. In relation to the Policy excluding commercial activities, Officers note that neither the policies, nor the rules, differentiate activities according to whether or not they are a commercial activity. Instead, Plan provisions focus on the range of effects that the activity will result in. This is considered appropriate and a better management practice than merely regulating the activities for commercial ventures. Notwithstanding the above, officers note that commercial activities that cause disturbance of the foreshore and seabed will generally be of a scale or type that trigger certain rules. However, even small commercial activities and non-commercial activities can be of a size, type or in a location that need to be managed in a manner that has regard to the sensitivity of the site specific values present plus the other matters set out in Policy 42. It is, therefore, preferable not to limit any policies or rules to commercial activities only and a broader approach captures all activities.
Further submissions – Trans-Tasman Resources Ltd (6)		Oppose	
Policy 43 – Port dredging			
6 – Trans-Tasman Resources Ltd	598	Amend The submitter wishes to expand the policy to refer to dredging which may also be required at other ports or for other significant infrastructure within the region. Submitter seeks amendments to Policy 43 of the Plan to refer to other nationally or regionally significant infrastructure and read as follows: <i>Policy 43: Portdredging</i>	Decline Officers consider the requested amendments to be largely a continuation of Policy 41 [Provision for disturbance, deposition or extraction activities that provide public or environmental benefit] that deliberately focuses on providing for dredging that provides for the safe and efficient operation of Port Taranaki. Officers have considered expanding upon the scope of the Policy to provide for maintenance and

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		<p><i>Maintenance and capital dredging activities for <u>ports or nationally or regionally significant infrastructure Port Taranaki</u>, including spoil disposal, will be managed in order that:</i></p> <p><i>(a) uncontaminated sand is deposited in inshore areas in a manner that mitigates the effects of <u>Port Taranaki facilities</u> on natural littoral sediment processes; [...]</i></p>	<p>capital dredging activities for other regionally significant infrastructure. However, officers recommend retaining the Policy in its current form, noting that the Port is the only location carrying out large scale activities with any frequency and other policies are applicable if need be</p> <p>Officers further note that there are other mechanisms available under the RMA, such as emergency works, should urgent works be required in relation to maintaining the safe and efficient operation of other regionally important infrastructure, e.g. pipelines.</p>
Further submissions – Department of Conservation (29), Te Rūnanga o Ngāti Mutunga (40), Te Atiawa (58)		Oppose	
43 – Royal Forest and Bird Protection Society	599	<p>Amend</p> <p>Submitter seeks amendments to Policy 43(b) of the Plan to read</p> <p><i>Maintenance and capital dredging activities for ports or nationally or regionally significant infrastructure Port Taranaki, including spoil disposal, will be managed in order that:</i></p> <p><i>(b) fine particle sediment (silt) and any contaminated sediment is deposited in appropriate offshore spoil disposal <u>locations</u> areas; [...];</i></p>	<p>Accept</p> <p>The submitter considers the wording of Policy 43(d) to be uncertain. Officers agree to the relief sought noting that the requested amendment provides greater clarity and is consistent with wording used in Policy 5, and elsewhere, within the Plan.</p>
57 – Heritage New Zealand	600	<p>Amend</p> <p>Submitter seeks amendments to Policy 43 of the Plan by adding a new clause (e) to read:</p> <p><i>Maintenance and capital dredging activities for Port Taranaki, including spoil disposal, will be managed in order that:</i></p> <p><i>[...]</i></p> <p><i><u>(e) adverse effects on historic heritage are managed in accordance with Policy 15.</u></i></p>	<p>Decline</p> <p>Officers recognise the concern of the submitter but suggest that their concerns have already been provided for within the Plan.</p> <p>As stated in the preamble of Section 5.1, Policy 43 must be read in conjunction with each of the other relevant policies, including all the General Policies and Policy 15. Together these policies address the matters sought by the submitter, including those relating to the protection of significant indigenous biodiversity It is not necessary to refer to indigenous biodiversity throughout the Policies when a standalone Policy provides the required protection already.</p>
Further submissions – Port Taranaki Ltd (32)		Oppose	
Policy 44 – Extraction or deposition of material			
6 – Trans-Tasman Resources Ltd	601	<p>Support</p> <p>Submitter supports Policy 44 (with the exception of Clause (f)) of the Plan as providing appropriate policy support and guidance for extraction and deposition activities in the coastal marine area.</p>	<p>Accept</p> <p>Support noted. Issues raised regarding Clause (f) are discussed in the following submission point.</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Further submissions – Department of Conservation (29), Te Rūnanga o Ngāti Ruanui Trust (61)		Oppose	
6 – Trans-Tasman Resources Ltd	602	<p>Amend</p> <p>Submitter seeks amendments to Policy 44 of the Plan to delete Clause (f): <i>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: [...]</i></p> <p>(f) where applicable and appropriate, ensure that the deposited material is of a similar size, sorting and parent material as the receiving sediments”.</p>	<p>Decline</p> <p>The submitter considers Clause (f) to be too subjective and provides no guidance as to when it may be applicable and appropriate to impose size and sorting requirements on the deposited material. Further, the submitter believes that there may be a range of circumstances when such requirements may not be appropriate.</p> <p>Officers note that Policy 44(f) includes a qualifier that, where applicable and appropriate, the deposition of material from any extractions from the foreshore or seabed must be of a similar size, sorting and parent material as the receiving sediments. As a general requirement, this is considered reasonable and appropriate. However, through the consenting process there is an opportunity to consider on a case-by-case basis any circumstances where such requirements may not be appropriate and set conditions relating to sizing and sorting requirements.</p>
9 – Karen Pratt	603	<p>Amend</p> <p>Submitter seeks amendments to Policy 44 of the Plan to include additional considerations and read as follows: <i>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: [...]</i></p> <p>(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 [...]</p>	<p>Accept in part</p> <p>The submitter wishes to strengthen Policy 44 by including a new clause to acknowledge biodiversity ‘hot-spots’ that are moderate to high relief reefs known by the local community of divers and recreational fishermen.</p> <p>Officers agree to amending the Policy to use different wording to include clause (c) as requested by the submitter to read: <i>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:</i> [...]</p> <p>(c) not occur close to moderate or high relief offshore reefs;</p> <p>In regards to the requested clause (d), “unique geological features that drive benthic primary habitat” is already implicitly addressed in (a) and there is no advantage to confining the consideration of such matters to the South Taranaki bight. Officers decline the request as clause (a) as currently worded provides a wider protection.</p>
Further submissions – Trans-Tasman Resources Ltd (6)		Oppose	
Further submissions – Te Rūnanga o Ngāti Mutunga (40), Te Korowai o Ngāruahine Trust (41), Nga Motu Marine Reserve Society Inc (44), Te Atiawa (58), Te Rūnanga o Ngāti Ruanui Trust (61)		Support	

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
41 – Te Korowai o Ngāruahine Trust	604	<p>Amend</p> <p>Submitter seeks amendments to Policy 44 of the Plan 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 <i>Takutai Moana Act 2011</i>.</p>	<p>Decline</p> <p>Officers note that the relief sought would exclude any extraction or deposition of natural material from the foreshore and seabed from most if not all of the Taranaki coastal marine area regardless of the size of the activity and regardless of whether there are any environmental effects. For example, the whole coastal marine area is currently subject to a Crown application or settlement under the <i>Takutai Moana Act 2011</i>.</p> <p>Officers note that there are areas where the extraction or disposition of material on the foreshore or seabed would clearly be inappropriate having regard to the values and sensitivity of the receiving environment. Further, policy direction is provided in the General Policies relating to the protection, maintenance and/or enhancement of particular values and uses plus the rules themselves may include standards, terms and conditions that would exclude the activity from areas identified in Schedules 2, 4A, 4B, 5A, 5B and 6. All Plan provisions need to be read together and in their entirety. They include the General Policies, relevant Activity-specific Policies and the rules (which address the type, scale and location of the activity. Some extraction and deposition activities are very minor. Others are more appropriately considered through the consenting process where there is an opportunity to consider the application on a case-by-case basis and impose conditions on where, how and when an activity can be undertaken and what actions need to be taken to avoid, remedy or mitigate any adverse effects.</p>
Further submissions – Trans-Tasman Resources Ltd (6)		Oppose	
Further submissions – Te Rūnanga o Ngāti Mutunga (40), Te Atiawa (58), Te Rūnanga o Ngāti Ruanui Trust (61)		Support	
43 – Royal Forest and Bird Protection Society	605	<p>Amend</p> <p>Submitter seeks amendments to Policy 44 of the Plan to read: <i>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 <u>will should</u>: [...];</i></p>	<p>Accept</p> <p>Officers recommend granting the relief sought by the submitter, however, recommend using “must” instead of “will” to maintain consistency with relief sought by other submitters.</p>
Further submissions – Port Taranaki Ltd (32)		Support	
57 – Heritage New Zealand	606	<p>Amend</p> <p>Submitter seeks amendments to Policy 44 of the Plan by adding a further point to read:</p>	<p>Decline</p> <p>Officers notes the concern of the submitter but suggest that their concerns have already been provided for within the Plan.</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		<p><i>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:</i></p> <p>[...]</p> <p><i>(h) manage adverse effects on historic heritage in accordance with Policy 15.</i></p>	<p>As stated in the preamble of Section 5.1, Policy 42 must be read in conjunction with each of the other relevant policies, including all the General Policies and Policy 15. Together these policies address the matters sought by the submitter, including those relating to the protection of significant indigenous biodiversity. It is not necessary to refer to indigenous biodiversity throughout the Policies when a standalone Policy provides the required protection already.</p>
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Support	
58 – Te Atiawa	607	<p>Amend</p> <p>Submitter seeks amendment to Policy 44 of the Plan to exclude areas and resources identified in Schedules 2, 4A, 4B, 5A, 5B and 6 areas subject to a Crown application or settlement under the <i>Takutai Moana Act 2011</i>.</p>	<p>Decline</p> <p>Officers note that the relief sought would exclude any extraction or deposition of natural material from the foreshore and seabed from most if not all of the Taranaki coastal marine area regardless of the size of the activity and regardless of whether there are any environmental effects. For example, the whole coastal marine area is currently subject to a Crown application or settlement under the <i>Takutai Moana Act 2011</i>.</p> <p>Officers note that there are areas where the extraction or disposition of material on the foreshore or seabed would clearly be inappropriate having regard to the values and sensitivity of the receiving environment. Further, policy direction is provided in the General Policies relating to the protection, maintenance and/or enhancement of particular values and uses plus the rules themselves may include standards, terms and conditions that would exclude the activity from areas identified in Schedules 2, 4A, 4B, 5A, 5B and 6. All Plan provisions need to be read in their entirety. They include the General Policies, relevant Activity-specific Policies and the rules (which address the type, scale and location of the activity). Some extraction and deposition activities are very minor. Other are more appropriately considered through the consenting process where there is an opportunity to consider the application on a case-by-case basis and impose conditions on where, how and when an activity can be undertaken and what actions need to be taken to avoid, remedy or mitigate any adverse effects.</p>
Policy 45 – Appropriateness of reclamation or drainage			
26 – Transpower NZ Ltd	608	<p>Amend</p> <p>Submitter supports Policy 45(d) of the Plan but seeks amendment to Policy to read:</p>	<p>Accept</p> <p>Officers note the support for Policy 45(d) that recognises nationally and regionally important infrastructure. However, the submitter is concerned that the term “not be</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		<p><i>Enable r</i>Reclamation or drainage of land in the coastal marine area <i>will not be allowed unless</i> where:</p> <p>[...]</p> <p><i>(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.</i></p>	<p>allowed” infers the decline of a resource consent and could be interpreted as predetermining the outcome of a resource consent process. The suggested wording provides an alternative that frames the policy more positively and captures the Policy intent. Officers agree to the request to amend Policy 45 but suggest a different wording to maintain consistency with other areas of the Plan:</p> <p><i>Allow r</i>Reclamation or drainage of land in the coastal marine area <i>will not be allowed unless where</i>: [...]</p>
Further submissions – Port Taranaki Ltd (32)		Support	
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Oppose	
43 – Royal Forest and Bird Protection Society	609	<p>Amend</p> <p>Submitter seeks amendment to Policy 45(a) and (b) of the Plan to refer to “functional need” so that this can be guided by Policy 5 in the Plan.</p>	<p>Accept in part</p> <p>Officers agree to amend Clause (b) to refer to “functional need” but given that the various clauses must all apply it is not considered necessary to again refer to functional need in Clause (a). The amendment would read as follows:</p> <p><i>(b) the activity which requires reclamation or drainage can only occur there is a functional need for the activity to be located</i> in or adjacent to the coastal marine area</p>
43 – Royal Forest and Bird Protection Society	610	<p>Amend</p> <p>The submitter considers Policy 45 to be uncertain in relation to determining “appropriateness”. It is the submitter’s contention that the <i>New Zealand Coastal Policy Statement</i> requires plans to provide direction in inappropriate locations/places.</p> <p>Submitter seeks amendment to Policy 45 of the Plan by including a new clause that states that the activity will be in an appropriate location.</p>	<p>Decline</p> <p>Officers believe that Plan provisions together provide the necessary direction and guidance to consider whether activities are in an appropriate location. As stated in the preamble of Section 5.1, Policy 45 must be read in conjunction with each of the other relevant policies, including all the General Policies and Policy 15. It is not necessary to refer to historic heritage throughout the Policies when a standalone Policy provides the required protection already.</p>
43 – Royal Forest and Bird Protection Society	611	<p>Amend</p> <p>Submitter seeks amendment to the Plan (Policy 5) to clarify that the activity in Policy 45 is subject to the protective policies in giving effect to the <i>New Zealand Coastal Policy Statement</i>.</p>	<p>Decline</p> <p>As stated in the preamble of Section 5.1, Policy 42 must be read in conjunction with each of the other relevant policies, including all the General Policies. Together these Policies provide for and give effect to the <i>New Zealand Coastal Policy Statement</i>. Therefore, it is not necessary or appropriate to reference other Policies within the Plan or Policies within the <i>New Zealand Coastal Policy Statement</i>.</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
59 – KiwiRail	612	Support	Accept
		Retain Policy 45 of the Plan as notified.	Support noted. Policy 45 is retained subject to amendments made to offer other submitters' relief where appropriate.
Policy 46 – Design of reclamation			
43 – Royal Forest and Bird Protection Society	613	Amend	Accept in part
		Submitter seeks amendment to Policy 46 of the Plan to provide for protection required by Policies 11, 13 and 14 of the <i>New Zealand Coastal Policy Statement</i> 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.	Officers believes the submitters concerns have already been provided for within the Plan. As stated in the preamble of Section 5.1, Policy 46 must be read in conjunction with each of the other relevant policies, including all the General Policies, which address the natural character and indigenous biodiversity policies of the <i>New Zealand Coastal Policy Statement</i> referred to by the submitter. It is not necessary to continuously refer to indigenous biodiversity or natural character value throughout the Policies when General Policies already provide for the required protection. Refer to submission points 280 and 609 in relation to amendments recommend to Policies 5 and 45 of the Plan.
Further submissions – Port Taranaki Ltd (32)		Oppose/Support in part	
57 – Heritage New Zealand	614	Amend	Decline
		Submitter seeks amendment to Policy 46 of the Plan by adding a new Clause (d) to read: <i>Subject to Policy 45, the design and form of any reclamation of land in the coastal marine area will:</i> [...] <i><u>(d) manage adverse effects on historic heritage in accordance with Policy 15.</u></i>	The submitter is concerned that land reclamation may adversely affect historic heritage and wishes to see it directly referenced within Policy 46. However, officers believe that the submitter's concerns have already been provided for within the Plan. As stated in the preamble of Section 5.1, Policy 42 must be read in conjunction with each of the other relevant policies, including all the General Policies and Policy 15. Together these policies address the matters sought by the submitter, including those relating to the protection of significant indigenous biodiversity It is not necessary to refer to indigenous biodiversity throughout the Policies when a standalone Policy provides the required protection already.
Policy 47 – Taking and use of coastal water			
6 – Trans-Tasman Resources Ltd	615	Support	Accept
		Submitter supports recognition in Policy 47 of the Plan that it is appropriate to take and use coastal water provided there are no adverse environmental effects.	Support noted. Policy 47 is retained subject to amendments made to offer relief to other submitters concerns where appropriate.
	616	Amend	Accept

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
33 - New Zealand Defence Force		Submitter seeks amendment to Policy 47 of the Plan to ensure a connection between the policy and rule framework and to allow the taking and use of coastal water at a rate and volume where the taking results in an acceptable level of environmental effect.	<p>Submitter is concerned that the Policy, as drafted, requires all adverse effects relating to the taking of coastal waters to be avoided. The submitter considers such a requirement impractical and in conflict with Rule 65 of the Plan.</p> <p>Officers agree to amend Policy 47 (plus minor inconsequential changes to align policy language with reliefs granted elsewhere) to read:</p> <p><i>Allow the taking and use of coastal water and any taking of heat or energy from coastal water will be allowed provided subject to it is not being taken in a quantity or at a rate and in a manner that avoids, remedies or mitigates that would cause adverse environmental effects..</i></p>
43 – Royal Forest and Bird Protection Society	617	Support	Accept
		Retain Policy 47 of the Plan as notified.	Support noted. Policy 47 is retained subject to amendments made to offer relief to other submitters' concerns where appropriate.
Further submissions – Port Taranaki Ltd (32)		Support	
Policy 48 – Damming or diversion of coastal water			
43 – Royal Forest and Bird Protection Society	618	Amend	Decline
		<p>The submitter does not believe that the use of “should” provides certainty and wishes to use “will” as a stronger directive. Submitter seeks amendment to Policy 48 of the Plan to read:</p> <p><i>Damming or diversion of coastal water will should not cause adverse environmental effects.</i></p>	Officers note that Policy 48 includes guidance but recognises that, in some circumstances, some adverse effects might be acceptable, especially if such effects are minor or transitory. The amendment sought by the submitter would preclude such considerations and be unnecessarily excessive.
Policy 49 – Noise and vibration			
9 – Karen Pratt	619	Amend	No relief necessary
		Submitter seeks amendment to Policy 49 of the Plan 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”.	Officers recognise the concerns of the submitter in regards to the protection of blue whales, mammals in the threat classification, or on the IUC red list. Officers note that Policy 44 [Extraction or deposition of material] would require the consideration of such matters and, consistent with the <i>New Zealand Coastal Policy Statement</i> , would require such activities to avoid adverse effects at a population level on blue whales and any other mammals in the threat classification, or on the IUC red list.

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Further submissions – Trans-Tasman Resources Ltd (6)		Oppose	Officers note that Policy 14 (plus the other General Policies) would also be considered in conjunction with Policy 49, which is specific to noise and vibration activities in the coastal marine area. Therefore, it is not necessary to amend Policy 49 as the sought relief is already adequately addressed within other areas of the Plan.
Further submissions – Nga Motu Marine Reserve Society Inc (44), Te Rūnanga o Ngāti Ruanui Trust (61)		Support	
33 - New Zealand Defence Force	620	Support Retain Policy 49 of the Plan as notified.	Accept Support noted. Policy 49 is retained subject to amendments made to offer relief to other submitters' concerns where appropriate.
Further submissions – Port Taranaki Ltd (32)		Support	No relief necessary Officers recognise the concerns of the submitter in regards to the protection of marine mammals and fish species. Officers note that Policy 44 [Extraction or deposition of material] would require the consideration of such matters and, consistent with the <i>New Zealand Coastal Policy Statement</i> , would require such activities to avoid adverse effects at a population level on blue whales and other mammals in the threat classification, or on the IUC red list. Officers note that Policy 14 (plus the other General Policies) would also be considered in conjunction with Policy 49, which is specific to noise and vibration activities in the coastal marine area. Therefore, it is not necessary to amend Policy 49 as the sought relief has already been addressed within other areas of the Plan.
43 – Royal Forest and Bird Protection Society	621	Amend Submitter seeks amendment to Policy 49 of the Plan to read: <i>Noise and vibration from activities undertaken in the coastal marine area, including underwater activities, will-be managed to minimise adverse environmental effects.</i> <i><u>(a) avoid adverse effects on marine mammals and fish species consistent with policies 8, 9 and 14; and</u></i> <i><u>(b) be managed to avoid, remedy or mitigate other minimise adverse environmental effects.</u></i>	
Further submissions – Trans Tasman Resources Ltd (6)		Oppose	
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Support	
48 – Taranaki District Health Board	622	Support Retain Policy 49 of the Plan as notified	Accept Support noted. Policy 49 is retained subject to amendments made to offer relief to other submitters' concerns where appropriate.
	623	Amend	Accept

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
60 - Te Kaahui o Rauru		Submitter seeks amendment to Policy 49 of the Plan to focus on avoiding and remedying adverse environmental effects before mitigating and emphasize the protection of biodiversity from adverse environmental effects.	The submitter notes that section 8.6.3 [General standards – Air] of the Plan does not contain noise and vibration limits to manage effects on biodiversity values and seek amendments to the Plan that focuses on avoiding such effects.
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Support	Officers recommend granting the relief sought by the submitter by amending Policy 49 to refer to managing noise and vibration from activities in the coastal marine area in a manner that avoids, remedies or mitigates adverse environmental effects (rather than the current focus on just minimising adverse effects). This would strength alignment between this Policy and other policies, particularly Policy 14 [Indigenous biodiversity] where there may be a requirement to avoid such effects.
New Policy – National Grid			
26 – Transpower NZ Ltd	624	<p>Amend</p> <p>As an alternative to reliefs sought by the submitter in relation to Policies 8, 14, and 19, amend Plan to include new policy specific to the National Grid that reads as follows:</p> <p><i><u>(a) Managing activities, to the extent reasonably practicable, to avoid adverse effects, including reverse sensitivity effects, on the National Grid; and</u></i></p> <p><i><u>(b) Manage the adverse effects of new National Grid infrastructure by all of the following:</u></i></p> <p><i><u>(i) recognising there may be some areas in the coastal environment where avoidance of adverse effects is required to protect the identified special values of those areas.</u></i></p> <p><i><u>(ii) seeking to avoid adverse effects on the values of the following:</u></i></p> <p><i><u>a. areas of significant indigenous biodiversity</u></i></p> <p><i><u>b. areas of outstanding value</u></i></p> <p><i><u>c. places or areas containing historic heritage of regional or national significance</u></i></p> <p><i><u>d. significant surf breaks</u></i></p> <p><i><u>(iii) where it is not reasonably practicable to avoid adverse effects on the value of the areas listed in d)ii) above because of the functional, operational, technical or locational needs of the National Grid, remedy or mitigate adverse effects on those values to the extent reasonably practicable;</u></i></p> <p><i><u>(iv) where reasonably practicable, avoiding, remedying or mitigating other adverse effects;</u></i></p>	<p>Accept in part</p> <p>Officers recommend declining the relief sought by the submitter in relation to a new policy specific to the national grid. However, consequential and sought amendments to Policies 14, 14B, 19 and 41 are recommended that give effect in part to the reliefs sought by the submitter.</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		<i><u>(v) consider offsetting for residual adverse effects on indigenous biological diversity.</u></i>	
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Oppose	

3.4 Methods

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Methods 1 to 7 – General			
2 – Federated Farmers	625	Support	Accept
		Retain Implementation Methods 1 - 7 of the Plan as notified.	Support noted. The Methods are retained subject to amendments to offer relief to other submitters' concerns where appropriate.
Further submissions – Port Taranaki Ltd (32)		Support	
Method 1 – Advice and information			
41 – Te Korowai o Ngāruahine Trust	626	Amend	Accept
		Submitter seeks amendment to Implementation Method 1 of the Plan 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.	Officers recommend granting the relief sought by the submitter by including a new Clause (ab) that reads as follows: 1. <i>Provide advice and information, including guidelines to coastal users, consent holders and the public: [...]</i> <i>(ab) to promote awareness of the natural, cultural, historic, and amenity attributes and values of the coastal environment, including the cultural significance and importance of the coastal and marine environments to Māori and iwi/hapū. [...]</i>
Further submissions – Te Rūnanga o Ngāti Mutunga (40), Te Atiawa (58), Te Rūnanga o Ngāti Ruanui Trust (61)		Support	
43 – Royal Forest and Bird Protection Society	627	Amend	Accept
		Submitter seeks amendment to Implementation Method 1(g) of the Plan to include reference to the <i>Marine Mammal Protection Act 1978</i> , <i>Wildlife Act 1953</i> and <i>Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012</i> .	Officers agree with the relief sought. It is recommended that Implementation Method 1(g) be amended to read: <i>(i) on responsibilities and processes under other legislation, for example, Fisheries Act 1996, Biosecurity Act 1993, Reserves Act 1977, and Heritage New Zealand Pouhere Taonga Act 2014, the Marine Mammal Protection Act 1978, Wildlife Act 1953 and Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012.</i>
Trans-Tasman Resources Ltd (6)		Oppose in part	
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Support	
Methods 2 and 3 – Economic instruments and works and services			
	628	Amend	Decline

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
41 – Te Korowai o Ngāruahine Trust		The submitter believes that the instruments, works and services referred to in Methods 2 and 3 should be used where they enhance and protect coastal values. The submitter seeks to amend Implementation Methods 2 and 3 of the Plan to delete the word <i>consider</i> .	Officers note that the use of economic instruments, and/or the Council undertaking works and services, may not necessarily be appropriate over the life of the Plan. It is appropriate that it be considered as a management response, on a case-by-case basis recognising that the use of economic instruments will not be appropriate in all circumstances.
Further submissions – Te Rūnanga o Ngāti Mutunga (40), Te Atiawa (58)		Support	
49 – Cam Twigley	629	Amend Submitter seeks amendment to Implementation Methods 2 and 3 of the Plan so that commentary on economic instruments and works and services also references the significant surfing area (and not just surf breaks).	Accept Officers agree to the relief sought by the submitter and recommend amending Implementation Methods 2 and 3 of the Plan so that commentary on economic instruments and works and services refer to the Significant Surfing Area (and not just surf breaks).
Method 4 – State of the environment monitoring			
61 – Te Rūnanga o Ngāti Ruanui Trust	630	Amend Submitter seeks amendment to Implementation Method 4 of the Plan to explicitly include cultural state of the environment monitoring within Taranaki Regional Council's state of the environment monitoring programme.	Accept in part Officers note that the level of detail sought by the submitter is not considered necessary or appropriate for this part of the Plan. However, officers note that Section 10.1 does include additional detail relating to monitoring the Plan's efficiency and effectiveness and suggest that Section 10.1 is the more appropriate place to refer to incorporating matauranga Māori into the Council's state of the environment monitoring. Officers recommend an alternative relief by amending Section 10.1 of the Plan to include cultural state of the environment monitoring within the Council's state of the environment monitoring programme.
Further submissions – Te Rūnanga o Ngāti Mutunga (40), Te Korowai o Ngāruahine Trust (41), Te Atiawa (58)		Support	
NEW Method – Spatial planning			
55 – Kiwis Against Seabed Mining	631	Amend Submitter seeks amendment to the Plan to include a new Implementation Method for the Taranaki Regional Council to use spatial planning to <ul style="list-style-type: none"> establish planning considerations which involves neighbouring rural nature, landscape, cultural history values and development-related interests 	Accept The submitter seeks the inclusion of marine spatial planning, as an Implementation method, to inform decision making. Officers recommend granting the relief sought by including a new Implementation Method 5A that reads as follows:

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		<ul style="list-style-type: none"> identify conflicting activities that would impact on mana whenua issues, areas of interest and cultural significance and incorporation of buffer zones include values-based framework that identifies, organises, and describes key Māori values as a basis for guiding and determining natural and physical resource management and can be used to set limits and standards connected to Māori values. 	<p><i>5A. Develop and implement spatial planning to achieve integrated management of the coastal environment, including the identification of sites and places with significant values, and, where appropriate, make this publicly available.</i></p>
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Support	
56 – Greenpeace	632	<p>Amend</p> <p>Submitter seeks amendment to Plan to include a new Implementation Method for the Council to use spatial planning to achieve integrated management of the marine environment that is collaborative and inclusive.</p>	<p>Accept</p> <p>The submitter seeks the inclusion of marine spatial planning, as an implementation method, to inform decision making.</p> <p>Officers recommend granting the relief sought by including a new Implementation Method 5A that reads as follows:</p> <p><i>5A. Develop and implement spatial planning to achieve integrated management of the coastal environment, including the identification of sites and places with significant values, and, where appropriate, make this publicly available.</i></p>
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Support	
61 – Te Rūnanga o Ngāti Ruanui Trust	633	<p>Amend</p> <p>Submitter seeks amendment to Plan to include a new Implementation Method for the Council to use spatial planning to</p> <ul style="list-style-type: none"> establish planning considerations which involves neighbouring rural nature, landscape, cultural history values and development-related interests identify conflicting activities that would impact on mana whenua issues, areas of interest and cultural significance and incorporation of buffer zones include values-based framework that identifies, organises, and describes key Māori values as a basis for guiding and determining natural and physical resource management and can be used to set limits and standards connected to Māori values. 	<p>Accept</p> <p>The submitter seeks the inclusion of marine spatial planning, as an implementation method, to inform decision making.</p> <p>Officers recommend granting the relief sought by including a new Implementation Method 5A that reads as follows:</p> <p><i>5A. Develop and implement spatial planning to achieve integrated management of the coastal environment, including the identification of sites and places with significant values, and, where appropriate, make this publicly available.</i></p>
Method 6 – Use and development of resources			

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
35 – Radio New Zealand Ltd	634	Support	Accept
		Retain as notified.	Support noted. Method 6 is retained as notified.
Method 8 – Coastal management framework			
43 – Royal Forest and Bird Protection Society	635	Amend	Accept in part
		<p>Submitter seeks amendment to Implementation Method 8 of the Plan to read: <i>Implement Plan objectives, policies and methods of implementation that recognise different coastal processes, values, and uses, and which allow, regulate or prohibit activities in:</i></p> <p><i>1. the following coastal management areas:</i></p> <p>a) <i>Outstanding Value</i> b) <i>Estuaries Unmodified</i> c) <i>Estuaries Modified</i> d) <i>Open Coast</i> e) <i>Port; and</i></p> <p><i>2. areas identified as having:</i></p> <p>a) <i>significant indigenous biodiversity values under Policy 14</i> b) <i>areas with natural character values under Policy XX</i> c) <i>areas with natural features and landscapes under Policy XX;</i> <i>Consistent with policies in section 5.1.</i></p>	<p>The relief sought seeks to expand Implementation Method 8 to reference locations, sites and places (at a finer spatial scale to coastal management areas) with significant coastal values.</p> <p>Officers recommend Method 8, which focuses on coastal management areas, be retained as is but propose an alternative relief whereby a new Method 8A is included that recognises significant sites and places at the finer spatial scale. The new Method would read as follows:</p> <p><i>8A. Implement Plan objectives, policies and methods of implementation that allow, regulate or prohibit activities in locations, areas or places with significant values in a manner that avoids, remedies or mitigates adverse effects on:</i></p> <p><i>a) infrastructure of regional importance</i> <i>b) natural character and natural features and landscapes</i> <i>c) indigenous biodiversity</i> <i>d) historic heritage, including sites of significance to Māori</i> <i>e) amenity values, including surf breaks.</i></p>
Further submissions – Port Taranaki Ltd (32)		Oppose	
Method 12 – Implement Plan to recognise use and development			
35 – Radio New Zealand Ltd	636	Support	Accept
		Retain Implementation Method 12 as notified.	Support noted. Policy 12 is retained as notified.
43 – Royal Forest and Bird Protection Society	637	Amend	No relief necessary
		Submitter supports in part Implementation Method 12 of the Plan but is opposed to the use of the term “ <i>appropriate use and development</i> ”. The submitter seeks amendments to the Implementation Method to reflect reliefs sought by the	Officers do not believe any changes to Implementation Method 12 are necessary. The submitter has not specified what changes they are seeking to the Implementation Method. However, providing for use and development is consistent

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		submitter to Policy 5 of the Plan whereby appropriateness is determined on the basis of avoiding inappropriate locations.	with the Section 5 sustainable management purpose of the RMA. The Council notes that not all use and development in the coastal environment will be appropriate. In determining what is appropriate use and development the reader need to refer to the policies, which includes consideration of locations plus other matters.
Further submissions – Transpower NZ Ltd (26), Radio New Zealand (35)		Oppose	
50 – Te Kāhui o Taranaki Trust	638	Amend Submitter seeks amendment to Implementation Method 12 of the Plan to read: <i>Implement Plan objectives, policies and methods of implementation that recognise and provide for appropriate use and development in the coastal environment where Māori cultural values are not adversely impacted on.</i>	Decline Officers do not believe any changes to Implementation Method 12 are necessary or appropriate. The methods section of the Plan is broad reaching and identifies non regulatory methods for achieving all the Plan objectives, including those relating to Māori cultural values. What is appropriate and where certain activities will be allowed will be determined having regard to the relevant policies and rules within the Plan (not the methods). It is important to note that these policies address broader values and uses than just Māori values and historic heritage. Officers do not consider it necessary for Plan provisions to focus on one set of values, or unnecessarily restate all the values.
Further submissions – Te Rūnanga o Ngāti Mutunga (40), Te Korowai o Ngāruahine Trust (41), Te Atiawa (58)		Support	
Methods 13 to 20 Natural heritage			
2 – Federated Farmers	639	Support Retain Implementation Methods 13 to 20 of the Plan as notified.	Accept Support noted. Implementation Methods 13 to 20 are retained subject to minor amendments to Method 14 made to offer relief to other submitters concerns where appropriate.
Further submissions – Port Taranaki Ltd (32)		Support	
29 – Department of Conservation	640	Amend The submitter is concerned by the number of blue penguins killed or injured by domestic dogs off leashes along Taranaki beaches and wishes to see bylaws to protect indigenous species encouraged through the Methods section. Submitter seeks amendment to Section 6.4 [Natural heritage] of the Plan to include a new Implementation Method to read: <i>Encourage district councils to enforce dog control bylaws to preserve indigenous biodiversity by reducing the risk of dogs killing or injuring native birds, marine mammals and other indigenous species.</i>	Accept in part Officers recognise the threat posed by dogs to penguins and other indigenous species, however, officers suggest there are disadvantages to confining advocacy to single issues. Instead, officers propose amending Implementation Method 14 to broaden its scope to advocacy for the purposes of protecting significant indigenous biodiversity, which includes territorial authorities, and could be for the purpose of encouraging the enforcement of dog control bylaws and to reduce the risk of dogs killing or injuring native birds, marine mammals and other indigenous species.

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Further submissions – Te Rūnanga o Ngāti Mutunga (40), Te Korowai o Ngāruahine Trust (41), Te Atiawa (58)		Support	However, advocacy would not be confined to that issue and could include other agencies, including the submitter, on other biodiversity related issues.
Method 15 – Integrated management			
56 – Greenpeace	641	Amend Submitter seeks amendment to Implementation Method 15 of the Plan 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.	No relief necessary The submitter wishes to see integrated management extended beyond the scope of Implementation Method 15. Officers note that actions or methods promoting integrated management are not confined to this particular method. It is evident in the development of this Plan, in the setting of objectives and General Policies, in the scheduling and identification of outstanding natural character, outstanding natural features and landscapes, biodiversity, and historic heritage. Undertaking many of the Methods of Implementation also may contribute to integrated management even if not explicitly stated. For example, the Council has significant extension programmes involving active and passive protection of biodiversity on land, including coastal herbfields, wetlands and dunes. Similarly the Council works with a wide variety of agencies and land occupiers under a range of statutes in order to achieve the requirements of the Coastal Plan and to widen our databases. Officers do not agree that it is necessary to amend Method 15 to achieve the submitter's request as these matters are fully addressed in the relevant sections of the Plan as discussed. Officers note that the achievement of integrated management is also dependent upon other agencies and Council may be limited in what it can influence yet alone achieve under other jurisdictions.
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Support	
Method 16 – Natural heritage			
9 – Karen Pratt	642	Amend The submitter considers the term “ <i>coastal site</i> ” to be ambiguous and prefers to use the term “ <i>coastal marine areas</i> ” as this indicates an offshore component. Submitter seeks amendment to Implementation Method 16 of the Plan to read: <i>Maintain and update GIS databases of all known coastal sites coastal marine areas with regionally significant values that identify their values, including the</i>	Decline Other submitters are encouraging the adoption of better spatial planning and Implementation Method 16 contributes to that deliverable. For the purposes of effective integrated management, officers suggest that it is appropriate for the methods to apply to the wider coastal environment, not just the coastal marine area. Referring to the coastal marine area would limit the scope of the method to

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		<i>presence of any threatened or regionally distinctive species and sites of high cultural, spiritual and historical significance.</i>	only areas within the coastal marine area, removing a considerable amount of onshore area that the Coastal Plan includes. Officers do not believe that it is the intention of the submitter to do so and reassure the submitter that "coastal sites" does include offshore reefs and sites within the coastal marine area in addition to the landward part of the coastal environment.
Further submissions – Trans-Tasman Resources Ltd (6)		Oppose	The Council gathers considerable information across the broad suite of its activities (not just those that relate to this Plan or the RMA) and regularly maintains and updates relevant information on its GIS databases. These include its biodiversity and biosecurity programmes under the <i>Local Government Act</i> and the <i>Biosecurity Act</i> but may also include useful information from the Council's other regional plans and/or from other agencies.
Method 19 – Natural heritage			
60 - Te Kaahui o Rauru	643	Amend	Accept
		Submitter seeks amendment to Implementation Method 19 to include mana whenua alongside landowners.	Officers agree to include mana whenua alongside landowners as requested by the submitter to read: <i>19. Promote active restoration of sand dunes and coastal herb fields, wetlands and forests through working with landowners and mana whenua and providing advice and funding for planting, weed and pest control and other related matters.</i>
Methods 21 to 31 – Historic heritage			
28 – Grant Knuckey	644	Amend	Accept in part
		Submitter seeks amendment to Implementation Methods 21 - 31 of the Plan to require reports mandated by mana whenua and including cultural dimensions applying matauranga Māori.	The Council is currently investigating the incorporation of matauranga Māori principles into its monitoring strategies. Although these changes are taking place, Officers do not consider it appropriate to include reporting requirements as a method in the Plan prior to the outcomes of that process. Officers note that specific reporting requirements and protocols are an operational matter best addressed outside the Plan.
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Support	
28 – Grant Knuckey	645	Amend	Decline
		Submitter seeks amendment to Implementation Methods 21 - 31 of the Plan to require for 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.	Officers recommend declining the relief sought noting that such matters are operational detail not appropriate to be included in the Plan. Notwithstanding the above, Officers note Implementation Method 30 which states that the Council will work with iwi authorities to develop memoranda of

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Further submissions – Trans-Tasman Resources Ltd (6)		Oppose	understanding that establish and maintain an effective working relationship. In particular, mana whakahono a rohe agreements between the Council and iwi represent an opportunity to set out agreements on Council – iwi relationships, including any requirements for resource consent applications, policy; or plan changes; or variations to be reported on by cultural advisers.
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Support	
28 – Grant Knuckey	646	Amend Submitter seeks amendment to Implementation Methods 21 – 31 of the Plan to require memoranda of understanding with manawhenua.	No relief necessary Officers note Implementation Method 30 already provides for the relief sought by the submitter. Method 30 states that the Council will work with iwi authorities to develop memoranda of understanding that establish and maintain an effective working relationship. Officers believe that this issue has been covered within the Plan and also has been fulfilled in the preparation of the Plan as consultations, workshops and agreements between the Council and local iwi played an important role in preparing the Proposed Plan. Notwithstanding the above, officers would like to note the opportunity for mana whakahono a rohe agreements between the Council and iwi as a further way to aid the Council – iwi relationship.
28 – Grant Knuckey	647	Amend Submitter seeks amendment to Implementation Methods 21 - 31 of the Plan to require marine spatial planning - incorporating matauranga Māori in collaboration with mana whenua.	Accept in part The submitter seeks the inclusion of marine spatial planning, as an implementation method, to require marine spatial planning that incorporates matauranga Māori in collaboration with manawhenua inform decision making. The submitter has not provided specific details as to what this relief looks like or how matauranga Māori is incorporated into a spatial framework. Officers note that the Council already gathers considerable information, including spatial information, across the broad suite of its activities (not just those that relate to this Plan or the RMA) and regularly maintains and updates relevant information on its GIS databases. The Council is further investigating the incorporation of matauranga Māori principles into its monitoring strategies with opportunities of incorporating some or all of that information into spatial planning. Officers recommend granting the relief sought in part by including a new Implementation Method 5A that reads as follows: <i><u>5A. Develop and implement spatial planning to achieve integrated management of the coastal environment, including the identification of sites and places with significant values, and, where appropriate, make this publicly available.</u></i>
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Support	

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
39 – Maniapoto Māori Trust Board	648	Other	No relief necessary
		Submitter encourages Council to uphold the principles of the Treaty of Wāitangi and to actively look at Māori representation on its standing committees.	The submitter's comments are noted. Officers direct the submitter to Implementation Method 31 which provides for tangata whenua to be represented on the Council's Policy and Planning Committee, the Consents and Regulatory Committee and other committees arising out of Treaty of Waitangi settlements. In addition, Objective 10 [Treaty of Waitangi] and Policy 16 [Relationship of tangata whenua] also provide consideration of the Treaty of Waitangi.
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Support	
41 – Te Korowai o Ngāruahine Trust	649	Support	Accept
		Submitter support Implementation Methods 21 to 31 of the Plan as a useful basis to support implementation of the Plan in line with tangata whenua values.	Support noted. Methods 21 – 31 are retained subject to amendments to Implementation Methods 24, 25 and 27 made to offer relief to other submitters concerns where appropriate.
Further submissions – Te Rūnanga o Ngāti Mutunga (40), Te Atiawa (58)		Support	
57 – Heritage New Zealand	650	Amend	No relief necessary
		Submitter seeks amendment to Section 6.5 of the Plan by adding a new Method within the section to read: <i>Regularly review and update Schedule 7 [Historic Heritage] to reflect the latest information; for example, new entries on the New Zealand heritage list/Rārangī Kōrero and new sites of significance identified by iwi and/or hapū.</i>	Officers do not believe the relief sought by the submitter is appropriate or necessary. The Methods of Implementation are optional content matters under Section 67 of the RMA. They are deliberately high level to broadly capture the suite of coastal uses and values addressed by the Plan. Officers do not believe it is necessary to provide the specificity sought by the submitter. Officers suggest that Implementation Method 16 already provides for the relief sought by the submitter. Method 16 states that Council will maintain and update GIS databases of all known coastal sites with regionally significant values, including historic significance. Section 10.2 [Review of the Plan] further states that a review of the relevant parts or provisions of the Plan may be carried out if a new issue arises, or if regional monitoring or research programmes show that a review would otherwise be appropriate.
Further submissions – Te Rūnanga o Ngāti Mutunga (40), Te Korowai o Ngāruahine Trust (41) Te Atiawa (58), Te Rūnanga o Ngāti Ruanui Trust (61)		Support	
57 – Heritage New Zealand	651	Amend	No relief necessary
		Submitter seeks amendment to Section 6.5 of the Plan by adding a new Method within the section to read:	Officers direct the submitter to Implementation Method 22, which already addresses supporting and, where appropriate, being involved in surveys, research and investigations involving historic heritage.

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		<i><u>Consider opportunities for collaboration with stakeholders on the protection and conservation of historic heritage.</u></i>	
Method 24 – Identification of wāhi tapu and other taonga			
42 – Ngati Hine Hapu of Te Atiawa	652	<p>Amend</p> <p>Submitter seeks amendment to Implementation Method 24 of the Plan to include the definition “waahi taonga” noting the submitter will provide the Taranaki Regional Council with GIS data of sites that they are willing to share.</p>	<p>Accept</p> <p>The submitter notes that it has GIS data on sites of significance in its rohe. Officers note and appreciate the offer to share this information with the view that the relevant sites of significance will be identified and included in the Plan and associated planning maps (where this is appropriate).</p> <p>Officers further agree to amend Implementation Method 24 (and other consequential amendments) to include “waahi taonga” within the Method 24. The amended Method would read as follows:</p> <p><i>24. Support and assist iwi as appropriate, with their identification of wāhi tapu, <u>wāhi taonga</u> and other taonga through the development of electronic wāhi tapu inventories, registers or ‘silent files’.</i></p>
Method 25 – Iwi involvement or partnership			
41 – Te Korowai o Ngāruahine Trust	653	<p>Amend</p> <p>Submitter suggests Implementation Method 25 of the Plan refers to two distinct forms of implementation and involvement and seeks that it be amended to separate those activities relating to databases and information (which is already addressed in Method 24).</p>	<p>Accept</p> <p>Officers agree to the relief sought by the submitter. Officers recommend amending Implementation Methods 24 and 25 to read:</p> <p><i>24. Support and assist iwi as appropriate, with their to develop iwi and Council databases and records that identify sites and places of special cultural and traditional value associated with the coastal environment, including the identification of wāhi tapu, <u>wāhi taonga</u> and other taonga through the development of electronic wāhi tapu inventories, registers or ‘silent files’.</i></p> <p><i>25. Consider iwi involvement or partnerships in Taranaki Regional Council resource investigations and projects, including developing iwi and Council databases and records that identify sites and places of special cultural and traditional value associated with the coastal environment.</i></p>
42 – Ngati Hine Hapu of Te Atiawa	654	<p>Amend</p> <p>Submitter seeks amendment to Implementation Method 25 of the Plan by deleting and replacing the word “consider” (in relation to Iwi involvement or partnerships in</p>	<p>Decline</p> <p>Officers recommend declining the relief sought by the submitter noting that involvement or partnerships with other parties (not just iwi) on Council</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		Council resource investigations and projects) with a stronger word to show a stronger commitment from the Council.	investigations and projects necessarily need to be considered on a case by case basis.
Further submissions – Te Rūnanga o Ngāti Mutunga (40), Te Korowai o Ngāruahine Trust (41) Te Atiawa (58), Te Rūnanga o Ngāti Ruanui Trust (61)		Support	
Method 27 – Promote public awareness of wāhi tapu and other taonga			
42 – Ngati Hine Hapu of Te Atiawa	655	Amend	Accept
		Submitter seeks amendment to Implementation Method 27 of the Plan to also refer to “waahi taonga”.	Officers recommend granting the relief sought by the submitter. It is recommended the Implementation Method 27 be amended to read: <i>27. Provide advice and information to generally promote awareness of wāhi tapu, wāhi taonga and other taonga and the importance and values of such sites and values.</i>
Method 29 – Historic heritage			
57 – Heritage New Zealand	656	Amend	No relief necessary
		Submitter seeks amendment to Implementation Method 29 of the Plan due to the potential issues with silent files and the accessibility of the public. The submitter suggests to consider using indicative markers on planning maps and consultation with iwi and/or hapū instead.	Officers note the concerns of the submitter are around a sensitive area of information to iwi/hapū. However, this level of detail is not considered appropriate for Plan methods. Such matters are currently being worked through in this Plan review process. Operational details to address potential issues with silent files and the use of indicative markers might be a matter to be addressed in Mana Wharehono a Rohe agreements. Although it is noted that in the engagement with iwi and hapū to date there is general agreement that polygons are the more appropriate planning tool which has been implemented as a result of such consultations with iwi/hapū.
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Support	
Method 31 – Historic heritage			
57 – Heritage New Zealand	657	Amend	Decline
		Submitter seeks amendment to Implementation Method 31 of the Plan to include how the Council will provide guidance on how tangata whenua representatives will be chosen.	Officers do not recommend granting the relief sought by the submitter. Officers consider this level of detail inappropriate for Plan methods noting that such matters have already been addressed with the agreements of the iwi authorities.

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Method 32 – Resource consents			
50 – Te Kāhui o Taranaki Trust	658	Amend Submitter seeks amendment to Implementation Method 32 of the Plan to read: <i>As appropriate, require new or renewed resource consents for the use or development of the coastal marine area to include a condition addressing public access <u>where Māori cultural values are not adversely impacted on.</u></i>	No relief necessary Officers recognise the submitters concerns regarding Māori cultural values with regards to public access. Officers would like reassure the submitter that such issues are already addressed as a matter of course through the Policies section. Note that the qualifier for including consent conditions addressing public access is it must be “appropriate”. Policy 17 (c) sets out directions where public access might not be appropriate and it includes, amongst other things, where restrictions necessary to protect historic heritage and sites and activities of cultural value to Māori. As the requested relief is already contained within the relevant policies and will be implemented on such instances where public access and cultural values coincide, officers consider it inappropriate to repeat the provisions already provided for.
Further submissions – Te Rūnanga o Ngāti Mutunga (40), Te Atiawa (58)		Support	
Method 34 – Public use and enjoyment			
2 – Federated Farmers	659	Support Retain Method 34 of the Plan as notified.	Accept Support noted. Method 34 is retained subject to minor amendments made to offer relief to other submitters' concerns where appropriate.
Further submissions – Port Taranaki Ltd (32)		Support	
5 – Point Board Riders	660	Support Submitter supports Implementation Method 34 of the Plan establishing a working group of stakeholders for the designated Significant Surfing Area and suggest the concept could be expanded to other parts of the coastline if the model is successful.	Accept Support and comments noted.
15 – Surfbreak Protection Society	661	Support Submitter supports Implementation Method 34 of the Plan establishing a working group of stakeholders for the designated Significant Surfing Area and seeks key surfing groups be involved.	Accept Support and comments noted.
	662	Amend	Accept in part

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
50 – Te Kāhui o Taranaki Trust		<p>The submitter comments that Implementation Method 34 is premature and contend that the Council has not gone through appropriate consultation on the surf breaks designations.</p> <p>Submitter seeks amendment to the Plan by deleting Implementation Method 34 of the Plan relating to the establishment of a working group to look at protecting and enhancing recreational values.</p>	<p>Officers note that through the Coastal Plan review there has already been considerable consultation and engagement on the issue of surf break protection. An initial list of regionally significant surf breaks was adopted in the current RPS, which was adopted in 2010. However, through the Coastal Plan review additional investigations and engagement occurred. This included the commissioning of reports on Regional significance criteria for the assessment of surfbreaks and Taranaki surf breaks of national significance, consultation and seeking of feedback on draft Plan policies, a draft Plan and, more recently, the Proposed Plan. As part of the review, an innovative 'wave survey' was also carried out that allowed the community to tell Council which surf breaks had specific values and why.</p> <p>In relation to Implementation Method 34, Officers note there is wide spread support for the establishment of a working group to look at not only protecting and enhancing recreational values in the Significant Surfing Area but also to address wider issues associated with public access, tourism promotion, the management of over-crowding, freedom camping, district council bylaws and the protection of other values in the area. This is an example of reliefs sought by other submitters, on other issues, where greater collaboration and integrated management is sought to address issues that are much broader than those covered by this Plan.</p> <p>Iwi and hapū are seen as integral to this concept working. If the submitter sees no merit in establishing a working group that includes relevant agencies, landowners, iwi and interest groups to protect and enhance the recreational values of the Significant Surfing Area as described in Schedule 7B, then the Council will not proceed. Accordingly, officers recommend amending the Method to <u>investigate</u> the establishment of a working group.</p>
Method 35 – Public Access			
42 – Ngati Hine Hapu of Te Atiawa	663	<p>Amend</p> <p>Submitter suggests that the reference to the <i>Queen Elizabeth the Second National Trust Act 1977</i> is in conflict with the intent of Implementation Method 35 to promote public access along the coast as the Queen Elizabeth II covenants generally exclude public access. Submitter seeks amendment to Implementation Method 35 of the Plan to delete reference to "Queen Elizabeth the Second National Trust Act 1977".</p>	<p>Accept</p> <p>Officers agree to the submitters request to remove the reference to "Queen Elizabeth the Second National Trust Act 1977".</p> <p>35. Promote the enhancement of public access to and along the coast through agreements or covenants with landowners under the Walking Access Act 2008, the Reserves Act 1977, or through the voluntary creation of esplanade strips under the RMA.</p>
Method 43 – Implement Plan			

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
50 – Te Kāhui o Taranaki Trust	664	<p>Amend</p> <p>Submitter seeks amendment to Implementation Method 43 of the Plan to read: <i>Promote industrial, domestic, and agricultural discharge and treatment systems, siting, design, installation, operation and maintenance procedures to avoid or mitigate adverse effects on coastal water or air quality <u>where Māori cultural values are not adversely impacted on.</u></i></p>	<p>No relief necessary</p> <p>Officers are aware that the submitter wishes to protect their cultural values that are associated with discharge systems, however, the rationale for avoiding or mitigating adverse effects on coastal water or air quality includes wider resource management considerations and is not confined to Māori cultural values. It is not appropriate to limit or restrict Implementation Method 43 in such a manner. Officers refer the submitter to the relevant policies, including General Policies, to see the level of protections provided for under such matters.</p>
Method 47 – Notify Medical Officer of Health			
48 – Taranaki District Health Board	665	<p>Amend</p> <p>Submitter seeks amendment to Implementation Method 47 of the Plan to read: <i>Notify the Medical Officer of Health for Taranaki and the relevant territorial authority if water quality shows that coastal water is unfit for contact recreation or gathering of shellfish for human consumption. <u>The Taranaki Regional Council will also conduct an investigation to determine the cause of the poor water quality if it is practicable.</u></i></p>	<p>Accept</p> <p>The submitter wishes to include a method component that emphasises the investigation into the cause of the poor water quality if it is practicable to do so. Officers agree and recommend amending Implementation Method 47 as sought.</p>
Method 48 – Advocate or encourage			
9 – Karen Pratt	666	<p>Amend</p> <p>The submitter is concerned about the potential adverse environmental effects of ballast water and seeks amendment to Implementation Method 48 of the Plan to reference Maritime New Zealand Marine Protection Rules and Craft Risk Management Standard and suggest looking at the wording in conditions of consent included in the recent granting to mine ironsand off New Zealand.</p>	<p>No relief necessary</p> <p>Officers suggest that the relief sought by the submitter is a matter to be considered when applying the rules. Method 48 is a non-regulatory method to achieve Plan objectives (in this case advocacy and encouragement).</p>
Further submissions – Trans-Tasman Resources Ltd (6)		Oppose	
29 – Department of Conservation	667	<p>Support</p> <p>Retain Method 48 of the Plan as notified.</p>	<p>Accept</p> <p>Support noted. Method 48 is retained as notified.</p>
Method 50 – Regional marine oil responses			
	668	Support	Accept

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
7 – Waikato Regional Council		Submitter supports Implementation Method 50 of the Plan relating to marine oil spill responses.	Support noted. Method 50 is retained as notified.
Further submissions – Port Taranaki Ltd (32)		Support	
Method 51 – Noise standards			
43 – Royal Forest and Bird Protection Society	669	Amend Submitter seeks amendment to Implementation Method 51 of the Plan to delete reference to New Zealand Standards and replace with: <i>[...] <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></i>	Decline Officers recommend declining the relief sought by the submitter noting that the <i>New Zealand Standards NZS 6802:2008 Acoustics - Environmental noise and NZS 6803: 1999 Acoustics – Construction Noise</i> have been adopted and underpin the limits set in Section 8.6.3 [General standards – Noise].
Further submissions – Trans-Tasman Resources Ltd (6), Port Taranaki Ltd (32)		Oppose	
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Support	
48 – Taranaki District Health Board	670	Amend Submitter seeks amendment to Implementation Method 51 of the Plan to read: <i>Consideration of the general standards in this Plan, and of New Zealand Standards NZS 6802:2008 Acoustics - Environmental noise and NZS 6803: 1999 Acoustics – Construction Noise when:</i> <i>(a) considering applications for coastal permits; or</i> <i>(b) determining whether noise <u>is unreasonable levels are excessive</u> for the purpose of enforcement action under Part 12 of the RMA.</i> <i><u>Note “excessive noise” is subject to special provisions of the RMA under sections 326-328 of the Act. Council enforcement officers may exercise powers to investigate complaints that noise is excessive and take appropriate actions under s.327 of the Act.</u></i>	Accept in part Officers recommend amending Implementation Method 51 in part to read: <i>Consideration of the general standards in this Plan, and of New Zealand Standards NZS 6802:2008 Acoustics - Environmental noise and NZS 6803: 1999 Acoustics – Construction Noise when:</i> <i>(a) considering applications for coastal permits; or</i> <i>(b) determining whether noise <u>is unreasonable</u> for the purpose of enforcement action under Part 12 of the RMA.</i> Officers suggest the explanatory note would be more appropriately placed in Section 8.6.3 of the Plan.
NEW Method Natural hazard management			

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
7 – Waikato Regional Council	671	Amend	Decline
		Submitter seeks that Council consider incorporating an adaptive pathways planning approach to natural hazards as a new Implementation Method.	No precise details of amendments sought to the Plan have been provided and seems to be an unnecessary level of detail given that the Coastal Plan would be only one of the elements necessary to deliver adaptive pathways planning approach to natural hazards with other agencies (such as territorial authorities) having the key role.

3.5 Rules

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
General – Plan			
43 – Royal Forest and Bird Protection Society	672	Amend	Accept The term “ <i>ecological values</i> ” means relating to or concerned with the relation to organisms to one another and their physical surroundings. As such it has a broad application and potentially captures other matters of control identified in relevant rules such as water quality but is potentially unclear as to what other constituent parts of the environment are also captured in the term. For the purposes of certainty and clarity, officers recommend changing reference to “ <i>effects on ecological values</i> ” to “ <i>effects on indigenous biodiversity</i> ” plus other consequential changes (addressing natural character) within the rules section to better align with Plan policies addressing natural form and functioning and indigenous biodiversity. This represents aligning language with the Council’s policy intent.
		Submitter seeks amendment to rules to change “ <i>effects on ecological values</i> ” to “ <i>effects on indigenous biodiversity</i> ” in matters for control.	
Further submissions – Port Taranaki Ltd (32)		Oppose	
43 – Royal Forest and Bird Protection Society	673	Amend	Decline No precise details of amendments sought to the Plan have been provided and officers are unclear as to what is sought in this relief. However, officers note that it is their view that all rules give effect to Policy 11 [Indigenous biological diversity (biodiversity)] of the <i>New Zealand Coastal Policy Statement</i> . Permitted activity rules are already proposed that are believed to be of a scale, type and location that any adverse effects on biodiversity will be less than minor and is consistent with community expectations set out in the Plan policies – particularly Policies 14, 14A and 14B the Plan, which, in turn give effect to Policy 11 of the <i>New Zealand Coastal Policy Statement</i> . Any permitted activity is subject to compliance with the standards, terms and conditions of the rule, which will ensure permitted activities are carried out in a manner that will avoid, remedy or mitigate effects on natural character and natural features and landscapes.
		Submitter seeks amendment to permitted activity rules of the Plan by replacing references to avoiding adverse effects on Policy 11 of the <i>New Zealand Coastal Policy Statement</i> 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 <i>New Zealand Coastal Policy Statement</i> .	
Further submissions – Powerco (45)		Oppose in part	
	674	Amend	No relief necessary

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
43 – Royal Forest and Bird Protection Society		Submitter seeks amendment to rules of the Plan to avoid adverse effect on natural character as required by Policies 13 and 15 of the <i>New Zealand Coastal Policy Statement</i> .	No precise details of amendments sought to the Plan have been provided. However, officers note that it is their view that all rules give effect to Policies 13 [Preservation of natural character] and 15 [Natural features and natural landscapes] of the <i>New Zealand Coastal Policy Statement</i> .
Further submissions – Te Rūnanga o Ngāti Mutunga (40), Te Korowai o Ngāruahine Trust (41), Te Atiawa (58)		Support	Permitted activity rules are believed to be of a scale, type and location that any adverse effects on natural character and natural features and landscapes will be less than minor and is consistent with community expectations set out in the Plan policies – particularly Policies 8 to 13 of the Plan, which, in turn give effect to Policies 13 and 15 of the <i>New Zealand Coastal Policy Statement</i> . Any permitted activity is subject to compliance with the standards, terms and conditions of the rule, which will ensure permitted activities are carried out in a manner that will avoid, remedy or mitigate effects on natural character and natural features and landscapes.
Further submissions – Powerco (45)		Oppose in part	Where activities are of a scale, type and location that any adverse effects on natural character and natural features and landscapes will likely to be more than minor a resource consent is required. Through the consenting process, all General Policies are considered, including Policies 8 to 13, when determining whether the activity will be allowed and, in the event that it is consented, what conditions will be imposed to avoid, remedy or mitigate effects on natural character and natural features and landscapes.
55 – Kiwis Against Seabed Mining	675	Amend Submitter seeks amendment to the Plan to include rules prohibiting and restricting fishing activities and protect coastal values as identified through spatial planning.	Decline Officers note that jurisdictional responsibilities for marine fishing lies with the Ministry for Primary Industries under the <i>Fisheries Act</i> . Regional councils are therefore not responsible for fishing activities within the coastal marine area except so far as there is disturbance or destruction of their habitat. Officers note that deposition and disturbance activities in the coastal marine area are already addressed via Plan rules. Any other prohibitions or restrictions targeting fishing activities are considered inappropriate. Officers recommend declining the relief sought by the submitter.
56 – Greenpeace	676	Amend Submitter seeks amendment to the Plan (rules) to ensure that fishing activities are managed so as to avoid, remedy or mitigate adverse effects to environmental bottom lines and policies of the <i>New Zealand Coastal Policy Statement</i> and/or values identified in the Regional Policy Statement and Coastal Plan.	Decline Officers note that jurisdictional responsibilities for marine fishing lies with the Ministry for Primary Industries under the <i>Fisheries Act</i> . Regional councils are therefore not responsible for fishing activities within the coastal marine area except so far as there is disturbance or destruction of their habitat. Officers note that

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Further submissions – Te Rūnanga o Ngāti Mutunga (40), Te Korowai o Ngāruahine Trust (41), Te Atiawa (58)		Support	deposition and disturbance activities in the coastal marine area are already addressed via Plan rules. Any other prohibitions or restrictions that specifically target fishing activities are considered inappropriate. Officers recommend declining the relief sought by the submitter.
61 – Te Rūnanga o Ngāti Ruanui Trust	677	Amend	No relief necessary
		Submitter seeks amendment to the Rules of the Plan to clearly articulate tangata whenua participation.	No precise details of amendments to the Plan have been provided and officers are unclear as to what amendments to rules would be appropriate to clearly articulate tangata whenua participation (presumably in relation to RMA matters). Officers do not believe operational details relating to the implementation of the Plan are appropriate to be included within a Plan yet alone in the rules section. Officers do not recommend making any changes to the rules section of the Plan in response to the relief sought. However, officers note consequential amendments have been made to relevant Plan objectives, policies and methods articulating tangata whenua values and relationships. Further opportunities to address operational detail exists outside the Plan. In particular, officers note that, through Mana Whakahono a Rohe agreements, such matters can be addressed and further detail provided. The Council will be seeking to work with tangata whenua in order to address these issues in the appropriate setting and format through Mana Whakahono a Rohe agreements.
Further submissions - Te Korowai o Ngāruahine Trust (41)		Support	Officers do not recommend making any changes to the rules section of the Plan in response to the relief sought. However, officers note consequential amendments have been made to relevant Plan objectives, policies and methods articulating tangata whenua values and relationships. Further opportunities to address operational detail exists outside the Plan. In particular, officers note that, through Mana Whakahono a Rohe agreements, such matters can be addressed and further detail provided. The Council will be seeking to work with tangata whenua in order to address these issues in the appropriate setting and format through Mana Whakahono a Rohe agreements.
61 – Te Rūnanga o Ngāti Ruanui Trust	678	Other	No relief necessary
		Submitter seeks that more details are provided with respect to the nature and scope of the word “ <i>minor</i> ” to avoid confusion.	The word “ <i>minor</i> ” has been used in several contexts. The most common instance is in relation to describing the effects of an activity. In general, the magnitude of the effects of an activity are determined on a case-by-case basis as it is not appropriate to make a blanket statement that covers so many variables, environmental locations and sensitive environments. For example, what is considered a minor effect in one location may produce a significant effect in another due to the nature of that specific location and the associated values and uses. The criteria for determining “ <i>minor adverse effects</i> ” is whether the activity will cause an adverse effect and the level of that effect and the time it would take for that effect to be remedied (either naturally or through remedial processes). Generally, minor effects are small and transitory such that they do not require avoiding, remedying or mitigating in order to maintain the values of that location, whether those be biological, environmental, historic, cultural, visual, etc.

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
61 – Te Rūnanga o Ngāti Ruanui Trust	679	Amend	Accept in part
		Submitter seeks amendment to the Rules section of the Plan that monitoring programmes referred to within the Rules section of the Plan include cultural or mauri indicators/values.	Officers do not believe the rules section is the appropriate place to introduce or detail cultural monitoring requirements. The submitter has not stated which rules need to be amended or the precise amendments sought. However, officers note that for Discretionary and Non-complying Activities, cultural monitoring programmes that include cultural or mauri indicators/values may be considered on a case-by-case basis as part of the consenting process. Similarly, Controlled Activity rules already include, as matters of control, monitoring considerations. Monitoring is a broad term that is used in the Plan to include all aspects of monitoring including cultural monitoring and there is no advantage in confining monitoring to particular forms. Again, through the consenting process, there is the opportunity to consider and include cultural or mauri indicators/values on a case-by-case basis as part of any compliance programme.
Further submissions - Te Rūnanga o Ngāti Mutunga (40), Te Korowai o Ngāruahine Trust (41), Te Atiawa (58)		Support	
61 – Te Rūnanga o Ngāti Ruanui Trust	680	Amend	No relief necessary
		Submitter seeks amendment to the Rules section of the Plan to reference adverse effects on Schedules 1, 2, 4C, 5B and Appendix 2 of the Plan.	Officers note that the appropriate references to Plan Schedules have already been included within the Rules section and no further additions are required. Note the submitter has sought the inclusion of standards, terms and conditions for rules in the Plan relating to Discretionary and Non-complying activities. The inclusion of such matters is not considered appropriate with conditions being developed on a case by case basis through the consenting process having regard to the relevant policies.
Rule 1 – Stormwater discharge			
29 – Department of Conservation	681	Amend	Decline
		Submitter seeks amendment to Rule 1 of the Plan to exclude its application to coastal management areas, Outstanding Value and Estuaries Unmodified.	The submitter believes that the permitted classification of stormwater discharge into Outstanding Value coastal management areas and Estuaries Unmodified is inappropriate. Stormwater is defined within the Plan and means “...runoff that has been channelled, diverted, intensified or accelerated by human modification of the land surface or runoff from the external surface of any structure as a result of precipitation (rainfall) and includes entrained contaminants and sediment (including that generated during construction or earthworks).”

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
			<p>Officers do not recommend granting the relief sought by the submitter. Officers do not consider it appropriate to require consents from all premises to simply authorise the discharge of rainfall runoff from their land.</p> <p>Coastal monitoring over the life of the current Coastal Plan has identified no issues with stormwater contributing to more than minor adverse effects to coastal water quality. Therefore, to now require all properties (urban, rural, industrial and trade premises) because they are adjacent to Outstanding Value and Estuaries Unmodified coastal management areas to get a resource consent, regardless of having less than minor adverse effects, imposes significant added compliance cost without any net environmental gain.</p> <p>Officers note that any permitted activity to discharge stormwater into the coastal marine area is still subject to compliance with the standards, terms and conditions of the rule, which will ensure permitted activities are carried out in a manner that will avoid, remedy or mitigate effects on coastal water quality and associated values and uses.</p>
40 – Te Rūnanga o Ngāti Mutunga	682	<p>Amend</p> <p>Submitter seeks amendment to Rule 1 of the Plan by deleting Activity Description (b)(i) in Rule 1 of the Plan to read:</p> <p><i>Stormwater discharge into water or onto land in the coastal marine area that either:</i></p> <p><i>(a) does not convey stormwater from any industrial or trade premises, or</i></p> <p><i>(b) conveys stormwater from industrial or trade premises that:</i></p> <p><i>(i) cover a total area of 2 ha or less; and</i></p> <p><i>(ii) do not use or store hazardous substances.</i></p>	<p>Decline</p> <p>The submitter believes that any stormwater discharge from an industrial or trade premises should be monitored for its possible adverse effects on the environment irrespective of the size of the trade or industrial premises.</p> <p>Stormwater is defined in the Plan and means “...runoff that has been channelled, diverted, intensified or accelerated by human modification of the land surface or runoff from the external surface of any structure as a result of precipitation (rainfall) and includes entrained contaminants and sediment (including that generated during construction or earthworks).”</p> <p>The relief sought by the submitter will significantly increase compliance costs on a range of businesses by including a requirement to obtain a consent to discharge stormwater. The RMA definition of ‘industrial or trade premises’ includes a large variety of premises such as surf lifesaving clubs, dairies etc. Stormwater discharges to the coastal marine area from these premises (recognising that they cannot use or store hazardous substances) are expected to have less than minor adverse effects.</p> <p>It is considered inappropriate to require consents from premises to simply authorise the discharge of rainfall runoff from their land. Officers recommend to retain the activity description (b)(i) of Rule 1 as notified.</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
40 – Te Rūnanga o Ngāti Mutunga	683	<p>Amend</p> <p>The submitter is not convinced that, even with the conditions listed, there is not a possibility of contamination of the water in these areas where stormwater discharges are allowed as a permitted activity.</p> <p>Submitter seeks amendment to amend Rule 1 of the Plan to make stormwater discharges a Discretionary Activity in Outstanding Value, Estuaries Unmodified and Estuaries Modified coastal management areas.</p>	<p>Decline</p> <p>Officers recommend declining the relief sought by the submitter.</p> <p>Officers note there are significant urban areas that would be affected by the relief sought by the submitter such as New Plymouth, Waitara, Urenui and Patea. Coastal monitoring over the life of the current Coastal Plan has identified no issues with stormwater contributing to more than minor adverse effects to coastal water quality. Therefore, to now require all properties (urban, rural, industrial and trade premises) to get a resource consent regardless of having less than minor adverse effects is not considered appropriate and would unnecessarily restrict activities without any net environmental impacts.</p>
40 – Te Rūnanga o Ngāti Mutunga	684	<p>Amend</p> <p>Submitter seeks amendment to Condition (i) of Rule1 of the Plan to read: (i) the discharge does not render marine organisms unsuitable for human consumption within recognised mātaītai reefs/resources; [...]</p>	<p>Accept</p> <p>The submitter identifies that there are difficulties in mapping all of the mātaītai areas within the Ngāti Mutunga rohe and request that the condition be expanded to include all marine organisms.</p> <p>Officers recommend granting the relief sought by the submitter by amending Condition (i) to read: <i>(i) the discharge does not render marine organisms unsuitable for human consumption within recognised mātaītai reefs/resources.</i></p>
40 – Te Rūnanga o Ngāti Mutunga	685	<p>Amend</p> <p>Submitter seeks amendment to Condition (k) of Rule1 of the Plan to read: <i>(k) the discharge does not cause the natural temperature to be changed by more than three degrees from normal seasonal water temperature fluctuations, after reasonable mixing or any changes that cause it to exceed 25 degrees Celsius.</i></p>	<p>Decline</p> <p>The submitter supports setting an upper temperature limit to the increase any discharge can have on water temperature due to the detrimental effect it can have on life.</p> <p>Officers do not consider the sought amendment necessary to maintain reasonable conditions for living organisms within the coastal marine area. A review of coastal water temperatures at coastal recreational monitoring sites between 2015 to 2018 shows that temperatures may naturally reach 25 degrees Celsius and the relief sought would unnecessarily restrict stormwater discharges at certain times of the year for no net environmental benefit.</p> <p>Officers recognise that any stormwater discharge effects must be minor and temporary and that the Condition (k) rule already adequately addresses the effects of temperature through the requirement that the discharge does not cause the natural temperature to be changed by more than three degrees from normal seasonal water temperature fluctuations. Therefore, it is not beneficial to include a</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
			threshold of 25 degrees Celsius, especially considering such temperatures can be 'naturally' exceeded.
41 – Te Korowai o Ngāruahine Trust	686	Amend	Decline
		<p>Submitter supports Rule 1 and specifically the inclusion of Condition (e) in Rule 1 of the Plan addressing historic heritage, but seeks further dialogue on how adverse effects will be considered in practice. The submitter is uncertain if the Council is best placed to determine if Condition (e) is met.</p> <p>If an agreement cannot be reached, submitter seeks amendment to Rule 1 to make stormwater discharges a Discretionary Activity (rather than Permitted Activity).</p>	<p>Officers will discuss the matter with the submitter during the pre-hearing engagement process.</p> <p>With regards to changing the Activity classification from Permitted to Discretionary, officers recommend declining the relief sought. The issue is one of managing adverse effects from normal incidental discharges of stormwater. It is not considered necessary or appropriate to require residential premises, production land, parks and reserves, and smaller benign industrial and trade premises adjacent to the coastal marine area to obtain a resource consent to discharge rainwater runoff.</p>
42 – Ngati Hine Hapu of Te Atiawa	687	Amend	Decline
		<p>Submitter expresses concern for conflicting activities between Activity Description (a) and (b) of Rule 1 of the Plan and seeks amendment to Activity Description (b) to read:</p> <p><i>Stormwater discharge into water or onto land in the coastal marine area that either:</i></p> <p><i>(a) does not convey stormwater from any industrial or trade premises, or</i></p> <p><i>(b) conveys stormwater from industrial or trade premises that:</i></p> <p>(i) cover a total area of 2 ha or less; and</p> <p>(ii) do not use or store hazardous substances [...]</p>	<p>Stormwater is defined in the Plan and means “<i>runoff that has been channelled, diverted, intensified or accelerated by human modification of the land surface or runoff from the external surface of any structure as a result of precipitation (rainfall) and includes entrained contaminants and sediment (including that generated during construction or earthworks).</i>”</p> <p>Officers recommend declining the relief sought by the submitter in that granting the relief would significantly increase compliance costs (for no net environmental gain) on a range of businesses by including a requirement for small industrial and trade premises (less than 2 ha) to obtain a consent to discharge stormwater. Definition of industrial or trade premises includes a large variety of premises such as surf lifesaving clubs, dairies etc. Stormwater discharges to the coastal marine area from these premises (recognising that they cannot use or store hazardous substances) are expected, based on previous coastal monitoring, to have less than minor adverse effects.</p>
46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	688	Support	Accept
		Retain Rule 1 of the Plan as notified.	Support noted. Rule 1 is maintained subject to minor amendments made to offer relief to other submitters' concerns where appropriate.
	689	Support	Accept

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
48 – Taranaki District Health Board		Retain Rule 1 of the Plan as notified.	Support noted. Rule 1 is maintained subject to minor amendments made to offer relief to other submitters' concerns where appropriate.
53 - Taranaki Regional Council	690	<p>Amend</p> <p>Submitter seeks amendment to the Activity Classification of Rule 1 of the Plan to include a schedule of hazardous substances, the type and quantity of which would warrant regulating through the resource consent process. Refer to threshold values that trigger controls under <i>Hazardous Substances and New Organisms Act 1996</i>.</p>	<p>Accept</p> <p>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.</p> <p>Officers recommend granting the relief sought by the submitter to include a schedule of hazardous substances limits (setting out for the reader's information hazardous property threshold criteria under the <i>Hazardous Substances and New Organisms Act</i>) and amending Rule 1 to read:</p> <p><i>Stormwater discharge into water or onto land in the coastal marine area that either:</i></p> <p><i>(a) does not convey stormwater from any industrial or trade premises, or</i></p> <p><i>(b) conveys stormwater from industrial or trade premises that:</i></p> <p><i>(i) cover a total area of 2 ha or less; and</i></p> <p><i>(ii) do not use or store hazardous substances <u>in quantities or of a type that exceed any of the hazardous property threshold criteria identified in Schedule 8AA.</u></i></p>
Further submissions – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd (46)		Support in part	
58 – Te Atiawa	691	<p>Amend</p> <p>Submitter suggests that storm water discharged from an industrial or trade premises should be assessed in terms of discharge constituents, volume and frequency, and the associated environmental impacts. They contend that land size should not be a consideration when assessing discharges of this nature.</p> <p>Amend Rule 1 by deleting activity description (b)(i) cover a total area of 2 ha or less;</p>	<p>Decline</p> <p>Stormwater is defined in the Plan and means "...runoff that has been channelled, diverted, intensified or accelerated by human modification of the land surface or runoff from the external surface of any structure as a result of precipitation (rainfall) and includes entrained contaminants and sediment (including that generated during construction or earthworks)."</p> <p>Officers recommend declining the relief sought by the submitter in that granting the relief would significantly increase compliance costs (for no net environmental gain) on a range of businesses by including a requirement for small industrial and trade premises (less than 2 ha) to obtain a consent to discharge stormwater. The RMA definition of industrial or trade premises includes a large variety of premises such as surf lifesaving clubs, dairies etc. Stormwater discharges to the coastal marine area from these premises (recognising that they cannot use or store hazardous substances) are expected to have less than minor adverse effects.</p>
58 – Te Atiawa	692	Amend	Accept

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		Submitter seeks amendment to Condition (i) of Rule 1 of the Plan to read: <i>(i) the discharge does not render marine organisms unsuitable for human consumption within recognised mātaimai reefs/resources.</i>	The submitter notes that full extent of mātaimai reefs/resources have not been mapped and therefore requests that Rule 1 be applied to all marine organisms. Officers recommend granting the relief as sought by the submitter.
58 – Te Atiawa	693	Amend Submitter seeks amendment to Rule 1 of the Plan by amending the Activity Classification to a Discretionary Activity (rather than a Permitted Activity) in order to provide iwi the opportunity to be involved in the decision making process to ensure conditions of consent are monitored.	Decline Officers recommend declining the relief sought by the submitter. To change the Activity Classification to Discretionary would require all industrial or trade premises to require a resource consent. This would capture (and impose unnecessary consenting and compliance costs) on all surf lifesaving clubs, dairies and small trade premises that generally have no or less than minor adverse effects. Officers further note the number of premises likely to face these increased costs given the significant urban areas adjacent to the coast including New Plymouth, Waitara, Oakura, Urenui and Patea. Officers note that coastal monitoring over the life of the current Coastal Plan has identified no issues with stormwater contributing to more than minor adverse effects to coastal water quality. Therefore, to now require all properties (urban, rural, industrial and trade premises) to get a resource consent regardless of having less than minor adverse effects is not considered appropriate. Officers consider the current Activity Classification sufficient and should be retained as currently notified.
61 – Te Rūnanga o Ngāti Ruanui Trust	694	Amend Submitter seeks amendment to Rule 1 of the Plan by amending several amendments to Rule 1 standards, terms and conditions to read: <i>[...]</i> <i>(d) the discharge 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 Settlement including those identified in Schedule 4C [Taonga species and habitat];</i> <i>(e) the discharge does not have an adverse effect on the values associated with cultural and historic heritage identified in Schedule 5 [Cultural and Historic heritage];</i> <i>(f) the discharge does not have adverse effect on Schedules 1 and 2</i> <i>(g) the activity does not have any adverse effects on any site identified in 5B [Sites of significance to Māori and associated values] and Appendix 2;</i>	Accept in part The submitter has made multiple requests to amend the conditions of Rule 1. Each of these requests are addressed point by point in the following: <ul style="list-style-type: none"> Officers agree to include reference to taonga species as requested but suggest that a new condition be included to read: <i>(ee) the discharge does not have an adverse effect on the taonga species as identified under iwi o Taranaki deeds of settlement, including those identified in Schedule 5C [Taonga species];</i> Officers do not consider the inclusion of “cultural” necessary or useful within Condition (e). The definition of historic heritage includes cultural considerations and captures sites of significance. Officers are uncertain as to what else needs to be captured or could be captured by including “cultural”. With regards to other cultural aspects these are better addressed separately, e.g. Condition (ee) covers taonga species.

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
			<p>Officers recommend retaining Condition (e) as currently notified within the Proposed Plan.</p> <ul style="list-style-type: none"> Officers do not believe that the inclusion of Schedules 1 and 2 adds any value to the rule. The Rule covers small standard stormwater discharge activities and any effects must be localised, minor and transitional. Certainty not at a scale that they would have an impact on an entire coastal management area or have an impact on the significant values and attributes of areas with outstanding natural character or natural features and landscapes. Officers recommend declining the inclusion of proposed Condition (f). By definition, historic heritage includes sites of significance to Māori, therefore, Officers do not consider it appropriate to create a standalone condition since it is already provided for within Condition (e). Officers recommend declining the request for a new proposed Condition (g).
Rules 1 to 17 – Discharges			
52 – Emily Bailey	695	<p>Amend</p> <p>Submitter seeks amendments to Rules 1 to 17 of the Plan that reference point source contaminant discharges to make discharging into the coastal environment a prohibited activity.</p>	<p>Decline</p> <p>Stormwater is defined in the Plan and means “<i>runoff that has been channelled, diverted, intensified or accelerated by human modification of the land surface or runoff from the external surface of any structure as a result of precipitation (rainfall) and includes entrained contaminants and sediment (including that generated during construction or earthworks).</i>”</p> <p>Rules 1 to 17 capture many different activities most of which involve point source discharges. It is appropriate that a coastal management regime be in place to manage adverse effects based upon the size and the significance of those adverse effects rather than banning all discharge activities outright. This is why the Plan includes a number of different Rules relating to point source contaminant discharges as each rule regulates a different kind of discharge or location type. Some discharges have minor risks that do not warrant requiring people going through the consents process. Other point source discharges to the coastal marine area may also be provided for, subject to going through the consenting process to ensure risks are fully accessed and specific conditions imposed to avoid, remedy or mitigate any adverse effects. Prohibiting such activities outright is not</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
			considered appropriate and is likely to be inconsistent with both the RMA and the <i>New Zealand Coastal Policy Statement</i> .
NEW Rule 1A – Stormwater discharges			
29 – Department of Conservation	696	Amend	Decline
		Submitter seeks amendment to the Plan to include a new rule, which makes stormwater discharge in the Outstanding Value and Estuaries Unmodified coastal management areas a Controlled Activity. The submitter seeks that the matters of control should be to the same effect as the conditions of Rule 1.	<p>Stormwater is defined within the Plan and means “...runoff that has been channelled, diverted, intensified or accelerated by human modification of the land surface or runoff from the external surface of any structure as a result of precipitation (rainfall) and includes entrained contaminants and sediment (including that generated during construction or earthworks).”</p> <p>Officers do not believe it would be appropriate to require consents from all premises to authorise the discharge of rainfall runoff from their land. The requested relief would capture a large number of premises and businesses such as camping grounds, dairies and small trading premises (and impose unnecessary consenting and compliance costs) immediately adjacent to Outstanding Value and Estuaries Unmodified coastal management areas.</p> <p>Coastal monitoring over the life of the current Coastal Plan has identified no issues with stormwater contributing to more than minor adverse effects in these areas to coastal water quality. Therefore, to now require all properties (urban, rural, industrial and trade premises) immediately adjacent to Outstanding Value and Estuaries Unmodified coastal management areas to get a resource consent, regardless of having less than minor adverse effects, is not considered appropriate.</p> <p>Officers note that any permitted activity is still subject to compliance with the standards, terms and conditions of the rule, which will ensure permitted activities are carried out in a manner that will avoid, remedy or mitigate effects on coastal water quality and associated values and uses. Officer recommend declining the relief sought by the submitter.</p>
Rule 2 – Stormwater discharges			
46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	697	Support	Accept
		Retain Rule 2 of the Plan as notified.	Support noted. Rule 2 is retained as notified.
Further submissions – Port Taranaki Ltd (32)		Support	

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Oppose	
47 – Fonterra	698	Support	Accept
		Retain Rule 2 of the Plan as notified.	Support noted. Rule 2 is retained as notified.
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Oppose	
61 – Te Rūnanga o Ngāti Ruanui Trust	699	Amend	Decline
		Submitter seeks amendment to Rule 2 (Discretionary Activity) of the Plan to include standards/terms/conditions to read: <i>(a) discharge does not adversely affect the matters/values identified for protection by mana whenua in the cultural impact assessment;</i> <i>(b) discharge complies with tangata whenua indicators referred to in the tangata whenua monitoring plan</i> <i>(c) 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>	The submitter has sought the inclusion of standards, terms and conditions for rules in the Plan relating to Discretionary and Non-Complying Activities. Officers recommend declining the relief sought by the submitter noting that it is not standard planning practice for Discretionary or Non-complying rules to include standards, terms and conditions. Conditions relating to a Discretionary Activity are developed on a case by case basis through the consenting process having regard to the relevant Plan policies. Officers note that all matters identified by the submitter would be considered through the consenting process with Policies 1 to 21, 22 and 27 being given effect to. In relation to notification requirements proposed by the submitter, Officers note that the Plan is not intended to provide the operational detail for implementing every aspect of the Plan. Such detail is more appropriately included in the Council's standard operating procedures and/or any Mana Whakahono a Rohe agreements.
Further submissions - Trans-Tasman Resources (6)		Oppose	
Further submissions – Te Rūnanga o Ngāti Mutunga (40), Te Korowai o Ngāruahine Trust (41), Te Atiawa (58)		Support	
Rule 3 – Stormwater discharges			
46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	700	Support	Accept
		Retain Rule 3 of the Plan as notified.	Support noted. Rule 2 is retained as notified.
	701	Amend	Decline

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
61 – Te Rūnanga o Ngāti Ruanui Trust		<p>Submitter seeks amendment to Rule 3 (Non-complying Activity) to include standards, terms and conditions to read:</p> <p><i>(a) discharge does not adversely affect the matters/values identified for protection by mana whenua in the cultural impact assessment;</i></p> <p><i>(b) discharge complies with tangata whenua indicators referred to in the tangata whenua monitoring plan</i></p> <p><i>(c) discharge is consistent with iwi management plan.</i></p> <p>AND</p> <p>Include the following notification note:</p> <p><i>Resource consent applications under this Rule will be notified to tangata whenua.</i></p>	<p>The submitter has sought the inclusion of standards/terms/conditions for rules in the Plan relating to Discretionary and Non-Complying activities.</p> <p>Officers recommend declining the relief sought noting that it is not standard planning practice for Discretionary Activity or Non-complying Activity rules to include standards, terms and conditions. Conditions relating to a Non-complying Activity are developed on a case-by-case basis through the consenting process having regard to the relevant Plan policies.</p> <p>Officers note that all matters identified by the submitter would be considered through the consenting process with Policies 1 to 21, 22 and 27 being given effect to.</p> <p>In relation to notification requirements proposed by the submitter, officers note that the Plan is not intended to provide the operational detail for implementing every aspect of the Plan. Such detail is more appropriately included in the Council's standard operating procedures and/or any Mana Whakahono a Rohe agreements.</p>
Further submissions – Trans-Tasman Resources (6)		Oppose	
Further submissions – Te Rūnanga o Ngāti Mutunga (40), Te Korowai o Ngāruahine Trust (41), Te Atiawa (58)		Support	
Rule 4 – Petroleum dispersal use in the Port			
21 – Climate Justice Taranaki	702	<p>Amend</p> <p>Submitter opposes the use of petroleum dispersant in any of the coastal management areas and certainly not as a Permitted Activity. Notes that two dispersants approved for use by Maritime NZ – Corexit 9500 and Corexit 952 – are extremely toxic to humans and the environment and seek that:</p> <ul style="list-style-type: none"> the use of the above-mentioned and other toxic petroleum dispersants be Prohibited in all coastal management areas; and the use of non-toxic dispersants be Discretionary (require a resource consent). 	<p>Accept in kind</p> <p>Petroleum dispersants are used in the event of an oil spill in order to aid oil spill response. They are very much a tool for avoiding, remedying or mitigating adverse effects in the event that capital dredging in Port Taranaki results in a natural marine oil seepage event. The rule covers an emergency situation not planned or foreseen as part of their consented activities.</p> <p>The Council recognise that the use of petroleum dispersants can, in some cases, lead to adverse effects. Accordingly, there use in an emergency event would only be used where other alternatives (including inaction) would have worst environmental consequences. Officers note that Gamalin is generally the preferred dispersant as it is less toxic and has been approved by Maritime NZ for most crude oil treatment. Corexit 9500 and Corexit 952 would only be used in very limited situations where other alternatives are unsuitable.</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
			Notwithstanding the above, the submitter and others have highlighted a broader issue of duplicating regulatory controls addressed by Maritime New Zealand under other legislation. Officers therefore recommend that Rule 4 be deleted.
40 – Te Rūnanga o Ngāti Mutunga	703	<p>Amend</p> <p>Submitter opposes permitting the use of petroleum dispersants in the Port and seeks amendment to Rule 4 of the Plan that such activities be a Discretionary Activity.</p>	<p>Accept in kind</p> <p>Petroleum dispersants are used in the event of an oil spill in order to aid oil spill response. They are very much a tool for avoiding, remedying or mitigating adverse effects in the event that capital dredging in Port Taranaki results in a natural marine oil seepage event. The rule covers an emergency situation not planned or foreseen as part of their consented activities.</p> <p>The Council recognise that the use of petroleum dispersants can, in some cases, lead to adverse effects. Accordingly, dispersants are only used in an emergency event where other alternatives (including inaction) would have worst environmental consequences.</p> <p>Notwithstanding the above, the submitter and others have highlighted a broader issue of duplicating regulatory controls addressed by Maritime New Zealand under other legislation. Officers therefore recommend that Rule 4 be deleted.</p>
41 – Te Korowai o Ngāruahine Trust	704	<p>Amend</p> <p>Submitter supports Rule 4 as a Permitted Activity, however, seeks the inclusion of a new condition that would require the notification of appropriate iwi authorities as soon as practicable after an event.</p>	<p>No relief necessary</p> <p>Officers note that Condition (b) already requires the Council, as the administering agency responsible for the implementation of the Plan, to be informed of dispersant use within 24 hours. As part of this Coastal Plan review process, Council has already agreed to forward these notifications to the relevant iwi authorities.</p> <p>Notwithstanding the above, the submitter and others have highlighted a broader issue of duplicating regulatory controls addressed under other legislation. Officers therefore recommend that Rule 4 be deleted.</p>
42 – Ngati Hine Hapu of Te Atiawa	705	<p>Amend</p> <p>Submitter noted concerns that rules relating to the use of petroleum dispersants is confined to the Port coastal management area and suggest that the rule apply to all coastal management areas (specifically those of outstanding value). Submitter seeks amendment to Rule 4 to include all coastal management areas.</p>	<p>Decline</p> <p>The submitter's comments are noted.</p> <p>Rule 4 addresses a quite discreet activity associated with capital dredging in Port Taranaki that results in a natural marine oil seepage event. Oil seepage associated with maritime accidents are separately addressed under maritime legislation. Officers suggest that the use of dispersants in an emergency event in other coastal management areas is less likely and in which case can be adequately under maritime legislation (or the emergency provisions of the RMA).</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
			Notwithstanding the above, the submitter and others have highlighted a broader issue of duplicating regulatory controls addressed under other legislation. Officers therefore recommend that Rule 4 be deleted.
54 – Maritime New Zealand	706	Amend	Accept
		Submitter seeks amendment to the Plan by deleting Rule 4, OR Alternatively, 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.	The submitter and others have highlighted a broader issue of duplicating regulatory controls addressed under other legislation. Officers therefore recommend that Rule 4 be deleted.
Further submissions – Port Taranaki Ltd (32)		Oppose/Support in part	
55 – Kiwis Against Seabed Mining	707	Support	Decline
		Submitter supports Rule 4 of the Plan as a Permitted Activity.	Support noted but note that in response to requests by other submitters, officers recommend deleting Rule 4.
56 – Greenpeace	708	Support	Decline
		Submitter supports Rule 4 of the Plan as a Permitted Activity.	Support noted but note that in response to requests by other submitters, officers recommend deleting Rule 4.
58 – Te Atiawa	709	Amend	No relief necessary
		Submitter seeks amendment to Rule 4 of the Plan by adding a new condition (d) to read: <i>(d) iwi are notified as soon as practicable after the event.</i>	Officers note that Condition (b) already requires the Taranaki Regional Council, as the administering agency responsible for the implementation of the Plan, to be informed of dispersant use within 24 hours. As part of this Coastal Plan review process, Council has already agreed to forward these notifications to the relevant iwi authorities. Notwithstanding the above, the submitter and others have highlighted a broader issue of duplicating regulatory controls addressed under other legislation. Officers therefore recommend that Rule 4 be deleted.
Rule 5 – Untreated human sewage			
	710	Support	Accept

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
5 – Point Board Riders		Retain Rule 5 of the Plan prohibiting untreated human sewage into the coastal marine area.	Support noted. Rule 5 is retained as notified.
21 – Climate Justice Taranaki	711	Support	Accept
		Retain Rule 5 of the Plan as notified.	Support noted. Rule 5 is retained as notified.
29 – Department of Conservation	712	Support	Accept
		Retain Rule 5 of the Plan as notified.	Support noted. Rule 5 is retained as notified.
40 – Te Rūnanga o Ngāti Mutunga	713	Support	Accept
		Retain Rule 5 of the Plan as notified.	Support noted. Rule 5 is retained as notified.
48 – Taranaki District Health Board	714	Support	Accept
		Retain Rule 5 of the Plan as notified.	Support noted. Rule 5 is retained as notified.
58 – Te Atiawa	715	Support	Accept
		Retain Rule 5 of the Plan as notified.	Support noted. Rule 5 is retained as notified.
Rule 6 – Wastewater treatment plant discharges			
8 – Silver Fern Farms	716	Support	Accept
		Retain Rule 6 of the Plan to provide for existing discharges of contaminants to coastal waters.	Support noted.
Further submissions – Federated Farmers (2)		Support	
21 – Climate Justice Taranaki	717	Amend	Decline
		The submitter opposes allowing an existing wastewater discharge that contains human sewage to discharge to the coastal management area after its consent expires and seeks that once existing consents expire, that the activity be Prohibited in all coastal management areas.	Officers recommend declining the relief sought. The relief sought would immediately preclude existing lawful discharges of municipal waste discharges to the coastal marine area in the absence of any other practicable options. To divert the quantities of waste onto land or other receiving environments is likely to be impracticable plus result in worse environmental outcomes due to the quantities involved and the lack of suitable locations to ensure
Further submissions – Royal Forest and Bird Protection Society (43)		Support	

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
			<p>the waste can be properly and safely assimilated to avoid, minimise or mitigate adverse environmental effects.</p> <p>Officers note Taranaki only has three municipal wastewater discharges. The resource consents for these marine outfalls include conditions that the consent holder must adhere to. These conditions are designed to prevent adverse effects by including limits on the discharge (pertaining to quality and quantity) and impact on the receiving environment. Consent holders must regularly reassess whether the current system remains to be the best practicable option, in light of technological advances and changing circumstances. Community involvement in the monitoring and management of these discharges, through involvement plans and stakeholder meetings, is also required in the resource consents.</p> <p>Officers suggest that some provision must be made in the rules to provide for the discharge of wastewater that contains treated human sewage. Most New Zealand cities discharge water directly or indirectly into the coastal marine area. However, this rule is a Discretionary Activity, which means a resource consent may be granted or declined subject to the Plan's policies. A discharge consent application is subject to meeting the directions and guidance set out in General Policies 1 to 21 and Activity-specific Policies 22, 24 and 26. With these Policies any discharge of treated wastewater must be of an acceptable quality and can only be considered when more appropriate alternatives have been considered. This rule is in line with the requirements of the <i>New Zealand Coastal Policy Statement Policy 23 [Discharge of contaminants] (2) and (3)</i> and meets the requirements of the RMA.</p> <p>It is the officers' view that providing the option to consider discharges of treated wastewater into the coastal marine area is necessary in order to provide for the requirements of the general public. Officers are satisfied that through the resource consents process, adverse environmental effects can be appropriately avoided, remedied or mitigated. Policy 26 in particular is highlighted whereby it is Council's expectation that the best practicable option be adopted to improve the quality of the discharge and reduce the quantity of the discharge.</p>
23 – New Plymouth District Council	718	<p>Support</p> <p>Retain Rule 6 of the Plan as a Discretionary Activity to support the continuation of wastewater discharges at the Waiwhakaiho.</p>	<p>Accept</p> <p>Support noted. Policy 6 is retained as notified.</p>
38 – Nigel Cliffe	719	<p>Other</p>	<p>No relief necessary</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		Submitter notes opposition (in relation to the toilet at Paora Road) to discharges of fluids or solids to the ocean. The submitter does not wish the toilet to discharge any fluids or solids either directly or indirectly by way of ground water. The submitter wishes to have the location of the toilet reassessed.	Submitter's comments are noted.
40 – Te Rūnanga o Ngāti Mutunga	720	<p>Amend</p> <p>Submitter does not support the disposal of treated or untreated human sewage to any water body due to the effect this will have on the mouri and wairua of the receiving water body. The submitter would prefer to see alternative disposal to land of the wastewater from the New Plymouth District Council's Treatment station at Waiwakaiho before the end of the current consent in 2041.</p> <p>Submitter seeks amendment to Rule 6 of the Plan to make all discharges of treated wastewater to the coastal marine area a Prohibited Activity (rather than a Discretionary Activity).</p>	<p>Decline</p> <p>Officers recommend declining the relief sought whereby the continuation of existing consented activities to discharge treated human sewage is prohibit.</p> <p>The relief sought would immediately preclude existing lawful discharges of municipal waste discharges to the coastal marine area in the absence of any other practicable options. To divert the quantities of waste onto land or other receiving environments is likely to be impracticable plus result in worst environmental outcomes due to the quantities involved and the lack of suitable locations to ensure the waste can be properly and safely assimilated to avoid, minimise or mitigate adverse environmental effects.</p>
Further submissions – Climate Justice Taranaki Inc (21)		Support	<p>Officers note Taranaki only has three municipal wastewater discharges. Their discharges are located a significant distance offshore away. The resource consents for these marine outfalls include conditions that the consent holder must adhere to. These conditions are designed to prevent adverse effects by including limits on the discharge (pertaining to quality and quantity) and impact on the receiving environment. Consent holders must regularly reassess whether the current system remains to be the best practicable option, in light of technological advances and changing circumstances. Community involvement in the monitoring and management of these discharges, through involvement plans and stakeholder meetings, is also required in the resource consents.</p> <p>Officers suggest that some provision must be made in the rules to provide for the discharge of wastewater that contains treated human sewage. Most New Zealand cities discharge water directly or indirectly into the coastal marine area. However, this rule is a Discretionary Activity, which means a resource consent may be granted or declined subject to the Plan's policies. A discharge consent application is subject meeting the directions and guidance set out in General policies 1 to 21 and Activity-specific Policies 22, 24 and 26. With these Policies the discharge must be of an acceptable quality and can only be considered when more appropriate alternatives have been considered. This rule is in line with the requirements of the <i>New Zealand Coastal Policy Statement</i> Policy 23 [Discharge of contaminants] (2) and (3) and meets the requirements of the RMA.</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
			It is officers' view that providing the option to consider discharges of treated wastewater into the coastal marine area is necessary in order to provide for the requirements of the general public. Officers are satisfied that through the resource consents process, adverse environmental effects can be appropriately avoided, remedied or mitigated. Policy 26 in particular is highlighted whereby it is Council's expectation that the best practicable option be adopted to improve the quality of the discharge and reduce the quantity of the discharge.
47 – Fonterra	721	Support	Accept
		Retain Rule 6 of the Plan as notified.	Support noted. Policy 6 is retained as notified.
58 – Te Atiawa	722	Amend	Decline
		Submitter seeks amendment to Rule 6 of the Plan to make all discharges of treated wastewater to the coastal marine area a Prohibited Activity (rather than a Discretionary Activity).	Officers recommend declining the relief sought whereby the continuation of existing consented activities to discharge treated human sewage is prohibit. The relief sought would immediately preclude existing lawful discharges of municipal waste discharges to the coastal marine area in the absence of any other practicable options. To divert the quantities of waste onto land or other receiving environments is likely to be impracticable plus result in worst environmental outcomes due to the quantities involved and the lack of suitable locations to ensure the waste can be properly and safely assimilated to avoid, minimise or mitigate adverse environmental effects. Officers note Taranaki only has three municipal wastewater discharges. Their discharges are located a significant distance offshore away. The resource consents for these marine outfalls include conditions that the consent holder must adhere to. These conditions are designed to prevent adverse effects by including limits on the discharge (pertaining to quality and quantity) and impact on the receiving environment. Consent holders must regularly reassess whether the current system remains to be the best practicable option, in light of technological advances and changing circumstances. Community involvement in the monitoring and management of these discharges, through involvement plans and stakeholder meetings, is also required in the resource consents. Officers suggest that some provision must be made in the rules to provide for the discharge of wastewater that contains treated human sewage. Most New Zealand cities discharge water directly or indirectly into the coastal marine area. However, this rule is a Discretionary Activity, which means a resource consent may be granted or declined subject to the Plan's policies. A discharge consent application
Further submissions – Climate Justice Taranaki Inc (21)		Support	

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
			<p>is subject meeting the directions and guidance set out in General Policies 1 to 21 and Activity-specific Policies 22, 24 and 26. With these policies, the discharge must be of an acceptable quality and must consider the best alternatives. This rule is in line with the requirements of the <i>New Zealand Coastal Policy Statement</i> Policy 23 [Discharge of contaminants] (2) and (3) and meets the requirements of the RMA.</p> <p>It is officers' view that providing the option to consider discharges of treated wastewater into the coastal marine area is necessary in order to provide for the requirements of the general public. Officers are satisfied that through the resource consents process, adverse environmental effects can be appropriately avoided, remedied or mitigated. Policy 26 in particular is highlighted whereby it is Council's expectation that the best practicable option be adopted to improve the quality of the discharge and reduce the quantity of the discharge.</p>
61 – Te Rūnanga o Ngāti Ruanui Trust	723	<p>Amend</p> <p>Submitter seeks amendment to Rule 6 (Discretionary Activity) of the Plan to include standards, terms and conditions to read:</p> <p><i><u>(a) discharge does not adversely affect the matters/values identified for protection by mana whenua in the cultural impact assessment:</u></i></p> <p><i><u>(b) discharge complies with tangata whenua indicators referred to in the tangata whenua monitoring plan</u></i></p> <p><i><u>(c) discharge is consistent with iwi management plan.</u></i></p> <p>AND</p> <p>Include the following notification note:</p> <p><i><u>Resource consent applications under this Rule will be notified to tangata whenua.</u></i></p>	<p>Decline</p> <p>The submitter has sought the inclusion of standards, terms and conditions for rules in the Plan relating to Discretionary and Non-Complying Activities. The inclusion of such matters is not considered appropriate with conditions being developed on a case-by-case basis through the consenting process having regard to the relevant policies.</p> <p>Notwithstanding the above, officers note that all matters identified by the submitter would be considered through the consenting process with Policies 1 to 21, 22 24 and 26 being given effect to.</p> <p>In relation to notification requirements proposed by the submitter, officers note that the Plan is not intended to provide the operational detail for implementing every aspect of the Plan. Such detail is more appropriately included in the Council's standard operating procedures and/or any Mana Whakahono a Rohe agreements.</p>
Further submissions – Te Rūnanga o Ngāti Mutunga (40), Te Korowai o Ngāruahine Trust (41), Te Atiawa (58)		Support	
Rule 7 – Wastewater treatment plant discharges			
21 – Climate Justice Taranaki	724	<p>Amend</p> <p>Submitter opposes allowing existing wastewater discharge that contains human sewage to discharge to the coastal management area, after its consent expires.</p>	<p>Decline</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		Seek that once existing consents expire, that the activity be a Prohibited Activity in all coastal management areas.	Officers recommend declining the relief sought whereby new discharges of treated human sewage to the Open Coast coastal management area would be a Prohibited Activity.
Further submissions - Royal Forest and Bird Protection Society (43)		Support	<p>The relief sought would preclude the consideration of any new municipal waste discharges to the coastal marine area even if such discharges were the best practicable option. To divert the quantities of waste onto land or other receiving environments is likely to be impracticable plus result in worst environmental outcomes due to the quantities involved and the lack of suitable locations to ensure the waste can be properly and safely assimilated to avoid, minimise or mitigate adverse environmental effects. Most New Zealand cities discharge water directly or indirectly into the coastal marine area.</p> <p>Officers note that the Rule is confined to the Open Coast coastal management areas and the activity would be prohibited in other coastal management areas. Considering New Plymouth has been identified in the <i>National Policy Statement for Urban Development Capacity</i> as a high growth city there is a regulatory requirement to provide supporting infrastructure to support that urban growth. As a Discretionary Activity, a discharge consent application is subject to meeting the directions and guidance set out in General Policies 1 to 21 and Activity-specific Policies 22, 24 and 26. With these policies, the discharge must be of an acceptable quality and must consider the best alternatives. This rule is in line with the requirements of the <i>New Zealand Coastal Policy Statement</i> Policy 23 [Discharge of contaminants] (2) and (3) and meets the requirements of the RMA.</p> <p>It is officers' view that providing the option to consider discharges of treated wastewater into the coastal marine area is necessary in order to provide for the requirements of the public. Officers are satisfied that through the resource consents process, adverse environmental effects can be appropriately avoided, remedied or mitigated. Policy 26 in particular is highlighted whereby it is Council's expectation that the best practicable option be adopted to improve the quality of the discharge and reduce the quantity of the discharge.</p>
40 – Te Rūnanga o Ngāti Mutunga	725	<p>Amend</p> <p>Submitter seeks amendment to Rule 7 of the Plan to make all discharges of treated wastewater to the coastal marine area a Prohibited Activity (rather than a Discretionary Activity).</p>	<p>Decline</p> <p>Officers recommend declining the relief sought whereby new discharges of treated human sewage to the Open Coast coastal management area would be a Prohibited Activity.</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Further submissions – Climate Justice Taranaki Inc (21)		Support	<p>The relief sought would preclude the consideration of any new municipal waste discharges to the coastal marine area even if such discharges were the best practicable option. To divert the quantities of waste onto land or other receiving environments is likely to be impracticable plus result in worst environmental outcomes due to the quantities involved and the lack of suitable locations to ensure the waste can be properly and safely assimilated to avoid, minimise or mitigate adverse environmental effects. Most New Zealand cities discharge water directly or indirectly into the coastal marine area.</p> <p>Officers note that the Rule is confined to the Open Coast coastal management areas and the activity would be prohibited in other coastal management areas. Considering New Plymouth has been identified in the <i>National Policy Statement for Urban Development Capacity</i> as a high growth city there is a regulatory requirement to provide supporting infrastructure to support that urban growth. As a Discretionary Activity, a discharge consent application is subject to meeting the directions and guidance set out in General Policies 1 to 21 and Activity-specific Policies 22, 24 and 26. With these policies, the discharge must be of an acceptable quality and must consider the best alternatives. This rule is in line with the requirements of the <i>New Zealand Coastal Policy Statement</i> Policy 23 [Discharge of contaminants] (2) and (3) and meets the requirements of the RMA.</p> <p>It is officers' view that providing the option to consider discharges of treated wastewater into the coastal marine area is necessary in order to provide for the requirements of the general public. Officers are satisfied that through the resource consents process, adverse environmental effects can be appropriately avoided, remedied or mitigated. Policy 26 in particular is highlighted whereby it is Council's expectation that the best practicable option be adopted to improve the quality of the discharge and reduce the quantity of the discharge.</p>
41 – Te Korowai o Ngāruahine Trust	726	<p>Amend</p> <p>Submitter seeks amendment to the Plan by deleting Rule 7 that makes new wastewater discharges to the coastal marine area a Discretionary Activity.</p>	<p>Decline</p> <p>Officers recommend declining the relief sought whereby presumably all new discharges of treated human sewage become a Prohibited Activity irrespective of the coastal management area.</p> <p>The relief sought would preclude the consideration of any new municipal waste discharges to the coastal marine area even if such discharges were the best practicable option. To divert the quantities of waste onto land or other receiving environments is not always going to be technically feasible and could result in worst environmental outcomes due to the quantities involved and the lack of suitable locations to ensure the waste can be properly and safely assimilated to</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
			<p>avoid, minimise or mitigate adverse environmental effects. Most New Zealand cities discharge water directly or indirectly into the coastal marine area.</p> <p>Officers note that the Rule is confined to the Open Coast coastal management areas and the activity would be prohibited in other coastal management areas. As a Discretionary Activity, a discharge consent application is subject to meeting the directions and guidance set out in General Policies 1 to 21 and Activity-specific Policies 22, 24 and 26. With these policies the discharge must be of an acceptable quality and can only be considered when more appropriate alternatives have been considered. This rule is in line with the requirements of the <i>New Zealand Coastal Policy Statement</i> Policy 23 [Discharge of contaminants] (2) and (3) and meets the requirements of the RMA. Officers understand that it is undesirable by many members of the public for treated sewage to be discharged into the coastal marine area. However, it is the officers' view that such activities are necessary in order to provide for the requirements of the general public and, through the resource consents process, adverse environmental effects can be appropriately avoided, remedied or mitigated.</p>
58 – Te Atiawa	727	<p>Amend</p> <p>Submitter seeks amendment to Rule 7 of the Plan to make all discharges of treated wastewater to the coastal marine area a Prohibited Activity (rather than a Discretionary Activity).</p>	<p>Decline</p> <p>Officers recommend declining the relief sought whereby new discharges of treated human sewage to the Open Coast coastal management area would be a Prohibited Activity.</p>
Further submissions – Climate Justice Taranaki Inc (21)		Support	<p>The relief sought would preclude the consideration of any new municipal waste discharges to the coastal marine area even if such discharges were the best practicable option. To divert the quantities of waste onto land or other receiving environments is likely to be impracticable plus result in worst environmental outcomes due to the quantities involved and the lack of suitable locations to ensure the waste can be properly and safely assimilated to avoid, minimise or mitigate adverse environmental effects. Most New Zealand cities discharge water directly or indirectly into the coastal marine area.</p> <p>Officers note that the Rule is confined to the Open Coast coastal management areas and the activity would be prohibited in other coastal management areas. Considering New Plymouth has been identified in the National Policy Statement for Urban Development Capacity as a high growth city there is a requirement to provide supporting infrastructure to support that urban growth. As a Discretionary Activity, a discharge consent application is subject to meeting the directions and guidance set out in General Policies 1 to 21 and Activity-specific Policies 22, 24 and 26. With these policies, the discharge must be of an acceptable quality and</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
			<p>must consider the best alternatives. This rule is in line with the requirements of the <i>New Zealand Coastal Policy Statement</i> Policy 23 [Discharge of contaminants] (2) and (3) and meets the requirements of the RMA.</p> <p>It is officers' view that providing the option to consider discharges of treated wastewater into the coastal marine area is necessary in order to provide for the requirements of the general public. Officers are satisfied that through the resource consents process, adverse environmental effects can be appropriately avoided, remedied or mitigated. Policy 26 in particular is highlighted whereby it is Council's expectation that the best practicable option be adopted to improve the quality of the discharge and reduce the quantity of the discharge.</p>
61 – Te Rūnanga o Ngāti Ruanui Trust	728	<p>Amend</p> <p>Submitter seeks amendment to Rule 7 (Discretionary Activity) of the Plan to include standards/terms/conditions to read:</p> <p><i>(a) discharge does not adversely affect the matters/values identified for protection by mana whenua in the cultural impact assessment;</i></p> <p><i>(b) discharge complies with tangata whenua indicators referred to in the tangata whenua monitoring plan</i></p> <p><i>(c) discharge is consistent with iwi management plan.</i></p> <p>AND</p> <p>Include the following notification note:</p> <p><i>Resource consent applications under this Rule will be notified to tangata whenua.</i></p>	<p>Decline</p> <p>The submitter has sought the inclusion of standards, terms and conditions for rules in the Plan relating to Discretionary and Non-Complying activities.</p> <p>Officers decline the relief noting that it is not standard planning practice for Discretionary Activity or Non-complying rules to include standards, terms and conditions. Conditions relating to a Discretionary Activity are developed on a case by case basis through the consenting process having regard to the relevant Plan policies.</p> <p>Officers note that all matters identified by the submitter would be considered through the consenting process with Policies 1 to 21, 22 and 27 being given effect to.</p> <p>In relation to notification requirements proposed by the submitter, Officers note that the Plan is not intended to provide the operational detail for implementing every aspect of the Plan. Such detail is more appropriately included in the Council's standard operating procedures and/or any Mana Whakahono a Rohe agreements.</p>
Further submissions – Te Rūnanga o Ngāti Mutunga (40), Te Korowai o Ngāruahine Trust (41), Te Atiawa (58)		Support	
Rule 8 – Wastewater treatment plant discharges			
5 – Point Board Riders	729	<p>Support</p> <p>Retain Rule 8 of the Plan prohibiting new wastewater discharges in the designated coastal management areas.</p>	<p>Accept</p> <p>Support noted. Rule 8 is retained as notified.</p>
	730	Support	Accept

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
21 – Climate Justice Taranaki		Retain Rule 8 of the Plan prohibiting new wastewater discharges in the designated coastal management areas (but seek that the activity be prohibited in the other coastal management areas as well).	Support noted. Support noted. Rule 8 is retained as notified.
Further submissions - Royal Forest and Bird Protection Society (43)		Support	
40 – Te Rūnanga o Ngāti Mutunga	731	Support Retain Rule 8 of the Plan prohibiting new wastewater discharges in the designated coastal management areas.	Accept Support noted. Support noted. Rule 8 is retained as notified.
41 – Te Korowai o Ngāruahine Trust	732	Amend Submitter seeks amendment to Rule 8 of the Plan to include any new wastewater discharge to the Open Coast thereby making all such discharges in the coastal marine area a Prohibited Activity.	Decline Officers recommend declining the relief sought whereby new discharges to the Open Coast coastal management area would be a Prohibited Activity. The relief sought would preclude the consideration of any new municipal waste discharges to the coastal marine area even if such discharges were the best practicable option. To divert the quantities of waste onto land or other receiving environments is likely to be impracticable plus result in worst environmental outcomes due to the quantities involved and the lack of suitable locations to ensure the waste can be properly and safely assimilated to avoid, minimise or mitigate adverse environmental effects. Most New Zealand cities discharge water directly or indirectly into the coastal marine area. Officers note that the Rule is confined to the Open Coast coastal management areas and the activity would be prohibited in other coastal management areas. Considering New Plymouth has been identified in the <i>National Policy Statement for Urban Development Capacity</i> as a high growth city there is a requirement to provide supporting infrastructure to support that urban growth. As a Discretionary Activity, a discharge consent application is subject to meeting the directions and guidance set out in General Policies 1 to 21 and Activity-specific Policies 22, 24 and 26. With these policies, the discharge must be of an acceptable quality and must consider the best alternatives. This rule is in line with the requirements of the <i>New Zealand Coastal Policy Statement</i> Policy 23 [Discharge of contaminants] (2) and (3) and meets the requirements of the RMA. It is officers' view that providing the option to consider discharges of treated wastewater into the coastal marine area is necessary in order to provide for the requirements of the general public. Officers are satisfied that through the resource
Further submissions – Climate Justice Taranaki Inc (21)		Support	

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
			consents process, adverse environmental effects can be appropriately avoided, remedied or mitigated. Policy 26 in particular is highlighted whereby it is Council's expectation that the best practicable option be adopted to improve the quality of the discharge and reduce the quantity of the discharge.
58 – Te Atiawa	733	Support Retain Rule 8 prohibiting new wastewater discharges in the designated coastal management areas.	Accept Support noted. Rule 8 is retained as notified.
Rule 9 – Sampling and biofouling in the Port			
16 – Ministry for Primary Industries	734	Amend Submitter seeks amendment to Rule 9 in order to refine how the Australian/New Zealand Anti-Fouling and In Water Cleaning Guidelines (2013) are translated into the Rules. In particular, to the description of fouling and the activity description. Amend permitted activity rule for in-water cleaning of biofouling to read: <u>Activity:</u> <i><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></i> <i><u>(a) deposition on the foreshore or seabed.</u></i> <i><u>Note: If the activity does not meet the standards, terms and conditions in this Rule refer to Rule 13.</u></i> <u>Standards/terms/conditions:</u> <i><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></i> <i><u>(b) microfouling may be cleaned without capture;</u></i> <i><u>(c) goose barnacles may be cleaned without capture;</u></i> <i><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 (Floerl et al (2005));</u></i>	Accept The intention of Rule 9 is to provide for additional hull cleaning activities that are currently prohibited under the current Plan. Hull cleaning currently excludes ships that are greater than 25 meters in length and any ships that have been outside the exclusive economic zone since their last hull cleaning. Many second-generation coastal plans have provisions that allow the cleaning of these hulls provided the appropriate standards, terms and conditions are met. It is officers' opinion that the requested amendments provide additional information that strengthens Rule 9 and aligns with industry requirements and procedures. Officers further note that capture of macrofoul will be an important condition to ensure that the Port and surrounding areas (of note the nearby area of outstanding value) are safeguarded against any possible invasive species introduction. Officers recommend granting the relief requested subject to minor inconsequential word changes to align the reading of rules with the remainder of the Plan.

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		<p><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></p> <p><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></p> <p><u>i. any cleaning activities commenced shall cease immediately, and</u></p> <p><u>ii. the Taranaki District Council and the Ministry for Primary Industries shall be notified without unreasonable delay; and</u></p> <p><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></p> <p><u>Notes</u></p> <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>	
Further submissions – Port Taranaki Ltd (32)		Oppose	
33 – New Zealand Defence Force	735	<p>Amend</p> <p>Submitter highlights that cleaning of biofoul is an important measure in controlling undesirable foreign organisms contaminating local waters and seeks amendment to Rule 9 of the Plan 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).</p>	<p>Decline</p> <p>Officers recognise the importance of regular hull cleaning in preventing the spread of invasive biota, however, note that it is important that the cleaning of biofoul is achieved in a manner and location where the potential adverse effects of contamination can be addressed in an appropriate and timely manner. This can only be achieved if cleaning practices are undertaken in the appropriate location</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Further submission – Royal Forest and Bird Protection Society (43)		Oppose	<p>which minimises the risk of contamination to other locations. The Port is the chosen location for these activities to be undertaken as it is already a largely modified environment, it has high traffic flow so is an ideal place to undertake the activity, plus, it is the only location within the region that is routinely and comprehensively monitored for invasive marine species.</p> <p>To perform cleaning in locations other than the Port introduces additional risks to those locations and the benefits of providing for the activity do not outweigh the potential risks. In this, officers prefer to adopt a precautionary approach to minimise the risks of contamination by foreign and invasive organisms to local waters outside the Port.</p>
33 – New Zealand Defence Force	736	<p>Amend</p> <p>Submitter generally supports Rule 9 but seeks to amend the standards, terms and conditions of Rule 9(c) to read:</p> <p><i>(c) the Ministry for Primary industries, or subsequent replacement Ministry, is advised immediately <u>without unreasonable delay</u> if a suspected invasion or non-indigenous aquatic species is encountered.</i></p>	<p>Accept</p> <p>Officers agree that immediate contact may not be reasonable and recommend granting the relief sought by the submitter. Officers note that the relief granted is subject to minor alterations to align condition(e)(ii) with requests sought by other submitters to read:</p> <p><i><u>(d) 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></i></p> <p><i><u>(ii) Taranaki Regional Council and the Ministry for Primary Industries is notified without unreasonable delay: [...]</u></i></p>
58 – Te Atiawa	737	<p>Amend</p> <p>Submitter opposes permitting in-water cleaning of biofouling in the Port as, in their view, there is no way of monitoring the activity and they are not convinced that the conditions stated will be adhered to.</p> <p>Submitter seeks amendment to Rule 9 of the Plan to make biofouling in the Port a Controlled Activity (rather than a Permitted Activity) and that the Council exercise control over such matters to ensure these matters are met by users of the Plan.</p>	<p>Decline</p> <p>The regular cleaning of biofoul is a desirable activity and should be encouraged and provided for in appropriate locations, i.e. the Port. Biofouling reduces the risk of 'dirty' boats and other crafts unintentionally bringing foreign harmful organisms (as hitch-hikers) into the region where they can then establish in our territorial waters. Bio-fouling is best undertaken in places where the activity can be monitored, controlled and the appropriate actions can be taken without delay if necessary. In this instance, the Port is the only appropriate location and, as such, it is a Non-complying Activity elsewhere.</p> <p>Officers would like to point out that the risks associated with sampling and cleaning of biofouling have been assessed by Ministry for Primary Industries who have legislative biosecurity responsibilities, including those relating to border control and</p>
Further submissions – Te Korowai o Ngāruahine Trust (41)		Support	
Further submissions – New Zealand Defence Force (33)		Oppose	

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
			<p>the enforcement of import health standards. The rule is consistent with their advice and good practice.</p> <p>Changing the Permitted Activity classification to Controlled may become a potential deterrent to people following best practice and could ultimately slow down the cleaning process increasing the risk to the environment by allowing biofoul communities time to grow or proliferate before they are removed from the vessel. Officers do not consider changing the Activity Classification of Rule 9 to be beneficial due to the potentially detrimental consequences and risks to maintaining healthy coastal waters.</p>
40 – Te Rūnanga o Ngāti Mutunga	738	<p>Amend</p> <p>Submitter seeks amendment to permitted activity rule for in-water cleaning of biofouling in the Port and make such activities a Controlled Activity.</p>	<p>Decline</p> <p>The regular cleaning of biofoul is a desirable activity and should be encouraged and provided for in appropriate locations, i.e. the Port. Biofouling reduces the risk of foreign organisms contaminating New Zealand waters and are best undertaken in places where the activity can be monitored, controlled and the appropriate actions can be taken immediately if necessary. In this instance, the Port is the only appropriate location and, as such, it is a Non-complying Activity elsewhere.</p> <p>Officers would like to point out that the risks associated with sampling and cleaning of biofouling have been assessed by MPI who have legislative biosecurity responsibilities, including those relating to border control and the enforcement of import health standards. The rule is consistent with their advice and good practice.</p> <p>Changing the Permitted Activity classification to Controlled may become a potential deterrent to people following best practice and could ultimately slow down the cleaning process increasing the risk to the environment by allowing biofoul communities time to grow or proliferate before they are removed from the vessel. Officers do not consider changing the Activity Classification of Rule 9 to be beneficial due to the potentially detrimental consequences and risks to maintaining healthy coastal waters.</p>
Further submissions – Te Korowai o Ngāruahine Trust (41)		Support	
Further submissions – New Zealand Defence Force (33)		Oppose	
Rule 10 – Sampling and biofouling			
9 – Karen Pratt	739	<p>Amend</p> <p>Submitter seeks amendment to Rule 10 to cover operations such as the recently granted consent for ironsand mining in the EEZ, i.e. artificial structures.</p>	<p>No relief necessary</p> <p>No precise details of amendments sought to Rule 10 have been provided. Officers note that Rule 10 applies to all biofouling activities in the relevant coastal management areas and no further change is considered necessary.</p>
Further submissions – Trans-Tasman Resources (6)		Oppose	

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
16 – Ministry for Primary Industries	740	Amend	Accept
		<p>Submitter seeks amendment to Rule 10 of the Plan by removing the word “scraping” from the Activity Classification, and to include the term “in-water” to describe where the cleaning is taking place and the words “involving” be replaced with “resulting in”, to read:</p> <p><i>In water cleaning Sampling, scraping and/or cleaning of biofouling from the part of a ship, moveable object or navigation aid that is normally below the water surface resulting in involving a discharge of a contaminant substance into water in the coastal marine area and any associated:</i></p> <p><i>(a) deposition on the foreshore or seabed.</i></p>	<p>Officers recommend amending the Activity Classification of Rule 10 with minor changes to accommodate the requests of other submitters to read:</p> <p><i><u>In-water cleaning of biofouling from</u> the part of a ship, moveable object or navigation aid that is normally below the water surface, <u>resulting in the discharge of a biological contaminants</u> into water in the coastal marine area and any associated:</i></p> <p><i>(a) deposition on the foreshore or seabed.</i></p>
Further submissions – Trans-Tasman Resources (6)		Support	
21 – Climate Justice Taranaki	741	Support	Accept
		Retain Rule 10 of the Plan so that any discharges from biofoul cleaning into all coastal management areas, excluding the Port, be non-complying.	Support noted.
Further submissions – Royal Forest and Bird Protection Society (43)		Support	
29 – Department of Conservation	742	Amend	Accept
		<p>Scraping is one type of cleaning that that is used when cleaning biofoul from a ship hull, in addition, it is a method that should not be used with many types of antifoul coatings used on vessels. Sampling is another activity, and should not be included alongside the cleaning of biofoul. Submitter seeks amendment to Rule 10 of the Plan to delete the words “Sampling, scraping and/or” from the activity description.</p>	<p>Officers recommend amending the Activity Classification of Rule 10 with minor changes to accommodate the requests of other submitters to read:</p> <p><i><u>In-water cleaning of biofouling from</u> the part of a ship, moveable object or navigation aid that is normally below the water surface, <u>resulting in the discharge of a biological contaminants</u> into water in the coastal marine area and any associated:</i></p> <p><i>(a) deposition on the foreshore or seabed.</i></p>
	743	Amend	Decline

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
33 - New Zealand Defence Force		Submitter seeks amendment to Rule 10 of the Plan to provide for biofouling activities in the Outstanding Value and Estuaries Unmodified Coastal Management Areas as a Discretionary Activity (rather than a Non-complying Activity).	The request would introduce a high level of risk that the Council considers unreasonable and unnecessary. An appropriate place for this activity to occur has been provided for in Port Taranaki through Rule 9 and broadening of this is not considered appropriate.
41 – Te Korowai o Ngāruahine Trust	744	Amend Submitter seeks amendment to Rule 10 of the Plan to make any sampling, scraping and/or cleaning of biofouling in coastal management areas, other than the Port, a Prohibited Activity (rather than Non-Complying Activity).	Decline Officers recommend declining the relief sought by the submitter. Recent case law has confirmed that Non-complying Activities is a high gateway test where Council (under section 104D RMA) would need to be satisfied that the adverse effects of the activity will be minor or the activity will not be contrary to the objectives and policies of the Plan. The presumption is that effects must be so minor that it is not likely to matter. However, its classification does allow some activities to at least be considered on a case-by-case basis to see if exceptions apply and could be provided for. Prohibited Activity status would preclude the consideration of any exceptional circumstances.
Further submissions – Trans-Tasman Resources (6), New Zealand Defence Force (33)		Oppose	
61 – Te Rūnanga o Ngāti Ruanui Trust	745	Amend Submitter seeks amendment to Rule 10 (Non-complying Activity) of the Plan to include standards/terms/conditions to read: <i><u>(a) discharge does not adversely affect the matters/values identified for protection by mana whenua in the cultural impact assessment;</u></i> <i><u>(b) discharge complies with tangata whenua indicators referred to in the tangata whenua monitoring plan</u></i> <i><u>(c) discharge is consistent with iwi management plan.</u></i> AND Include the following notification note: <i><u>Resource consent applications under this Rule will be notified to tangata whenua.</u></i>	Decline The submitter has sought the inclusion of standards, terms and conditions for Rules in the Plan relating to Discretionary and Non-Complying activities. The inclusion of such matters is not considered appropriate with conditions being developed on a case-by-case basis through the consenting process having regard to the relevant policies. Notwithstanding the above, officers note that all matters identified by the submitter would be considered through the consenting process with Policies 1 to 21, 22 and 28 being given effect to. In relation to notification requirements proposed by the submitter, officers note that the Plan is not intended to provide the operational detail for implementing every aspect of the Plan. Such detail is more appropriately included in the Council's standard operating procedures and/or Mana Whakahono a Rohe agreements.
Further submissions – Trans-Tasman Resources (6)		Oppose	
Further submissions – Te Rūnanga o Ngāti Mutunga (40), Te Korowai o Ngāruahine Trust (41), Te Atiawa (58)		Support	

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Rule 11 – Abrasive blasting discharges			
26 – Transpower NZ Ltd	746	Amend	Accept
		<p>Submitter supports Rule 11 of the Plan but notes that the <i>National Environmental Standards for Electricity Transmission</i> only applies to existing structures and since there are no existing National Grid structures in the coastal marine area (as identified in the Proposed Coastal Plan for Taranaki) and therefore subject to the Plan, the reference is not required. Further, the <i>National Environmental Standards for Electricity Transmission</i> is not applicable when erecting or placing new structures.</p> <p>Submitter seeks amendment to Rule 11 to delete reference to <i>National Environmental Standards for Electricity Transmission Activities</i>: [...] excluding activities regulated by the Resource Management (National Environmental Standards for Electricity Transmission Activities Regulations 2009 (Appendix 6)).</p>	<p>The reference to the <i>National Environmental Standards for Electricity Transmission</i> is redundant and does not add further value to the Plan. Officers recommend granting the relief sought by the submitter by removing the reference.</p>
32 – Port Taranaki	747	Amend	Decline
		<p>Submitter suggests that within the Port coastal management area the effects of this activity are well known and understood. Therefore, submitter seeks amendment to Rule 11 of the Plan to make the activity a Controlled Activity in the Port coastal management area and draft an appropriate set of matters over which control shall be restricted to.</p>	<p>Abrasive blasting is capable of having significant adverse environmental effects. Given the amount of industrial and trade premises in the vicinity of the Port, the storage and transfer of dangerous and hazardous cargos and other materials, it is appropriate that such matters be considered on a case-by-case basis as a Discretionary Activity to ensure adverse effects are appropriately avoided, remedied or mitigated.</p>
41 – Te Korowai o Ngāruahine Trust	748	Amend	Decline
		<p>Submitter seeks amendment to Rule 11 of the Plan to make abrasive blasting discharges in the coastal marine area a Non-Complying Activity (rather than Discretionary Activity).</p>	<p>Officers recommend declining the relief sought by the submitter.</p> <p>Recent case law has confirmed that Non complying Activities is a high gateway test where Council (under section 104D of the RMA) would need to be satisfied that the adverse effects of the activity will be minor or the activity will not be contrary to the objectives and policies of the Plan. The presumption is that effects must be so minor that it is not likely to matter.</p> <p>However, it is officer's view that abrasive blasting is an often necessary and routine activity for the maintenance, repair or alterations to existing structures, including wharves, mooring and berthing structures, and bridges. As such, it needs to be provided for. Officers recommend retaining the Rule's Discretionary Activity status</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
			to consider abrasive blasting activities on a case-by-case basis to and, if approved, would ensure there are conditions addressing the avoidance, remedying or mitigating of adverse effects. Prohibited Activity status would preclude these considerations.
61 – Te Rūnanga o Ngāti Ruanui Trust	749	<p>Amend</p> <p>Submitter seeks amendment to Rule 11 (Discretionary Activity) of the Plan to include standards, terms and conditions to read:</p> <p><i><u>(a) discharge does not adversely affect the matters/values identified for protection by mana whenua in the cultural impact assessment:</u></i></p> <p><i><u>(b) discharge complies with tangata whenua indicators referred to in the tangata whenua monitoring plan</u></i></p> <p><i><u>(c) discharge is consistent with iwi management plan.</u></i></p> <p>AND</p> <p>Include the following notification note:</p> <p><i><u>Resource consent applications under this Rule will be notified to tangata whenua.</u></i></p>	<p>Decline</p> <p>The submitter has sought the inclusion of standards, terms and conditions for rules in the Plan relating to discretionary and non-complying activities.</p> <p>Officers decline the relief noting that it is not standard planning practice for Discretionary or Non-complying rules to include standards, terms and conditions. Conditions relating to a Discretionary Activity are developed on a case by case basis through the consenting process having regard to the relevant Plan policies.</p> <p>Officers note that all matters identified by the submitter would be considered through the consenting process with Policies 1 to 21, 22, 30, 39, 40 and 41 being given effect to.</p> <p>In relation to notification requirements proposed by the submitter, officers note that the Plan is not intended to provide the operational detail for implementing every aspect of the Plan. Such detail is more appropriately included in the Council's standard operating procedures and/or any Mana Whakahono a Rohe agreements.</p>
Further submissions – Te Rūnanga o Ngāti Mutunga (40), Te Korowai o Ngāruahine Trust (41), Te Atiawa (58)		Support	
Rule 12 – Seismic surveying and bathymetric testing			
6 – Trans-Tasman Resources Ltd	750	<p>Support</p> <p>Retain Rule 12 of the Plan 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.</p>	<p>Accept</p> <p>Support noted.</p>
Further submissions – Petroleum Exploration and Production Association of New Zealand (37)		Support	
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Oppose	
	751	Amend	Decline

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
21 – Climate Justice Taranaki		Submitter opposes further petroleum prospecting and exploration and seek that the Plan be amended to make all seismic surveying for petroleum in any coastal management area a Prohibited Activity.	Officers recommend declining the relief. Seismic surveying and bathymetric testing provide useful and important insights into crustal activities that occur within the Taranaki Region and are not limited to industrial uses within the petroleum industry. Not only are these insights useful but they are also necessary as they provide information relating to the tectonic situation of the region, including faults, flexure and crustal thickening relating to the overarching tectonic regime of the Zealandia continent. Such information is necessary for hazard mitigation and preparation including earthquake, tsunami and volcanic activity as well as providing insights into the past events that occurred in geologic time.
Further submissions – Trans-Tasman Resources (6), Petroleum Exploration and Production Association of New Zealand (37)		Oppose	The Council recognises that a number of submitters are concerned by the potential effects of seismic surveying and bathymetric testing, primarily in relation to the impacts of oil and gas exploration and/or seabed mining and the disturbance of marine organisms. However, rules within the Plan should consider the activity and anticipated effects rather than the purpose. Seismic surveying and bathymetric testing has occurred in the Taranaki coastal marine area in the past and has not been demonstrated to have significant adverse effects. The effects of seismic and bathymetric testing are generally minor and transitory. As it stands, the rule promotes consistent policy across the territorial sea and exclusive economic zone. To make monitoring activities prohibited because it is linked to a particular lawful commercial activity, irrespective of effects, is not considered appropriate.
29 – Department of Conservation	752	Support Retain Rule 12 of the Plan as notified but reconsider rule should a potential whale sanctuary in the Taranaki coastal environment eventuate.	Accept Support noted.
Further submissions – Climate Justice Taranaki Inc (21)		Oppose	
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Support	
37 – Petroleum Exploration and Production Association of NZ	753	Support Retain Rule 12 of the Plan as notified.	Accept Support noted.

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Further submissions – Climate Justice Taranaki Inc (21), Te Rūnanga o Ngāti Ruanui Trust (61)		Oppose	
Further submissions – Port Taranaki Ltd (32)		Support	
40 – Te Rūnanga o Ngāti Mutunga	754	<p>Amend</p> <p>Submitter seeks amendment to Rule 12 of the Plan to make seismic surveying or bathymetric testing activity a Discretionary Activity (rather than a Permitted Activity).</p>	<p>Decline</p> <p>Officers recommend declining the relief.</p> <p>Seismic surveying and bathymetric testing provide useful and important insights into crustal activities that occur within the Taranaki Region and are not limited to industrial uses within the petroleum industry. Not only are these insights useful but they are also necessary as they provide information relating to the tectonic situation of the region, including faults, flexure and crustal thickening relating to the overarching tectonic regime of the Zealandia continent. Such information is necessary for hazard mitigation and preparation including earthquake, tsunami and volcanic activity as well as providing insights into the past events that occurred in geologic time.</p> <p>The Council recognises that a number of submitters are concerned by the potential effects of seismic surveying and bathymetric testing, primarily in relation to the impacts of oil and gas exploration and/or seabed mining and the disturbance of marine organisms. However, rules within the Plan should consider the activity and anticipated effects rather than the purpose. Seismic surveying and bathymetric testing has occurred in the Taranaki coastal marine area in the past and has not been demonstrated to have significant adverse effects. The effects of seismic and bathymetric testing are generally minor and transitory.</p> <p>As it stands, the rule promotes consistent policy across the territorial sea and exclusive economic zone. To make monitoring activities obtain a resource consent because it is linked to a particular lawful commercial activity, irrespective of effects, is not considered appropriate.</p>
Further submissions – Trans-Tasman Resources (6), Petroleum Exploration and Production Association of New Zealand (37)		Oppose	
Further submissions – Te Korowai o Ngāruahine Trust (41), Te Rūnanga o Ngāti Ruanui Trust (61)		Support	
40 – Te Rūnanga o Ngāti Mutunga	755	<p>Amend</p> <p>Submitter seeks amendment to Rule 12 of the Plan to amend Condition (a) to delete reference to: <i>any subsequent applicable Code of Conduct</i>.</p>	<p>Accept</p> <p>Officers recommend granting the relief sought by the submitter.</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Further submissions – Trans-Tasman Resources (6)		Neutral	
Further submissions – Te Korowai o Ngāruahine Trust (41)		Support	
41 – Te Korowai o Ngāruahine Trust	756	Amend Submitter seeks amendment to Rule 12 of the Plan to require a higher level of regulatory control for seismic surveying or bathymetric testing activity (currently a Permitted Activity).	Decline Submitter opposes seismic surveying or bathymetric testing activities on the basis that the Department of Conservation's Code of Conduct is flawed and that, in their view, research evidence clearly cites the harm that is caused to marine mammals, larvae development and zoo plankton. The submitter suggests that the marine mammal guidelines do not assess the total effects on the marine environment and do not mitigate the risks to the marine environment. The submitter suggests that the rule's reliance on the guidelines as the basis to afford permitted activity status neglects the impact on fish, larvae and invertebrates and Māori customary and commercial fishing rights. Officers refer the submitter to the Department of Conservations support for Rule 12, including compliance with the 2013 Code of Conduct. Officers note that seismic surveying and bathymetric testing provide useful and important insights into crustal activities that occur within the Taranaki region and are not limited to industrial uses within the petroleum industry. Not only are these insights useful but they are also necessary as they provide information relating to the tectonic situation of the region, including faults, flexure and crustal thickening relating to the overarching tectonic regime of the Zealandia continent. Such information is necessary for hazard mitigation and preparation including earthquake, tsunami and volcanic activity as well as providing insights into the past events that occurred in geologic time. The Council recognises that a number of submitters are concerned by the potential effects of seismic surveying and bathymetric testing, primarily in relation to disturbance of marine organisms. However, the effects of seismic and bathymetric testing are generally minor and transitory. As it stands, the rule promotes consistent policy across the territorial sea and exclusive economic zone. To make monitoring activities prohibited because it is linked to a particular lawful commercial activity type, irrespective of effects, is not considered appropriate.
Further submissions – Petroleum Exploration and Production Association of New Zealand (37)		Oppose	
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Support	
	757	Amend	No relief necessary

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
41 – Te Korowai o Ngāruahine Trust		Submitter seeks amendment to Rule 12 to include a condition that ensures no adverse effects on the cultural interests of sites specified in Schedule 5B.	Officers are unaware of any adverse effects likely to result on the sites of significance. Impacts on aquatic life tends to be temporal with fish being able to avoid the area of disturbance and returning once the activity ceases or moves on. The matter will be discussed further with the submitter as part of pre-hearing engagement.
42 – Ngati Hine Hapu of Te Atiawa	758	Amend	Decline
		Submitter questions how an event such as a rahui could be considered when Rule 12 makes no mention of iwi/hapū involvement. Submitter seeks amendment to 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.	The nature of permitted activities is that they do not require consenting and/or notification provided the appropriate terms, standards and conditions are met. Officers will discuss how seismic surveying and bathymetric testing could impact on a rahui with the submitter during the pre-hearing consultations but officers note that a rahui is not provided for or governed by the RMA (or any other legislation) and is therefore not enforceable through the Plan. .
Further submissions – Trans-Tasman Resources (6), Petroleum Exploration and Production Association of New Zealand (37)		Oppose	With regards to the making the activity a Controlled Activity (rather than a Permitted Activity). It is officers' view that this is unnecessarily restrictive in that it would require a consent for an activity that contributes to our knowledge of the coastal marine area and is having less than minor environmental effects. Officers appreciate that a number of submitters have strong views about the appropriateness of certain industries such as oil and gas. However, most of these issues relate to hydrocarbon production activities, which are a separate consideration and for which Discretionary and Non-complying rules will apply. Further information will be sought as to what if any effects would not be considered minor or transitory and/or not adequately addressed by the standards, terms and conditions of the Rule.
Further submissions – Te Korowai o Ngāruahine Trust (41)		Support	
43 – Royal Forest and Bird Protection Society	759	Amend	Decline
		Submitter seeks amendment to Rule 12 of the Plan 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). 	The submitter believes that seismic testing has adverse effect including significant adverse effects on marine mammals and fish species. In addition, it is their view that a permitted activity classification would not enable the Council to give effect to the <i>New Zealand Coastal Policy Statement</i> . Further, the 2013 standards are inadequate and have been under review since 2015 and cannot be relied on to ensure the Council gives effect to the <i>New Zealand Coastal Policy Statement</i> . The submitter suggests that the Council will need to consider expert advice on the generation of noise and vibration on marine species.
Further submissions – Trans-Tasman Resources (6), Petroleum Exploration		Oppose	

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
and Production Association of New Zealand (37)			<p>The submitter has not given direction to which aspects of the <i>New Zealand Coastal Policy Statement</i> this Rule does not comply with, however, it is the opinion of officers that the <i>New Zealand Coastal Policy Statement</i> is given effect to and notes that the Department of Conservation supports Rule 12. The 2013 Code of Conduct is currently being reviewed by the Department of Conservation. Officers will be seeking to include/reference any updated versions of the Code if it is completed in time.</p> <p>Officers further note that seismic surveying and bathymetric testing provide useful and important insights into crustal activities that occur within the Taranaki Region and are not limited to industrial uses within the petroleum industry. Not only are these insights useful but they are also necessary as they provide information relating to the tectonic situation of the region, including faults, flexure and crustal thickening relating to the overarching tectonic regime of the Zealandia continent. Such information is necessary for hazard mitigation and preparation including earthquake, tsunami and volcanic activity as well as providing insights into the past events that occurred in geologic time.</p> <p>The Council recognises that a number of submitters are concerned by the potential effects of seismic surveying and bathymetric testing, primarily in relation to disturbance of marine organisms. However, rules within the Plan should consider the activity and anticipated effects rather than the purpose. The effects of seismic and bathymetric testing are generally minor and transitory. As it stands, the rule promotes consistent policy across the territorial sea and exclusive economic zone. To make monitoring activities prohibited because it is linked to a particular lawful commercial activity, irrespective of effects, is not considered appropriate.</p>
Further submissions – Climate Justice Taranaki Inc (21)		Support in part	
Further submissions – Te Korowai o Ngāruahine Trust (41), Te Rūnanga o Ngāti Ruanui Trust (61)		Support	
44 – Nga Motu Marine Reserve Society Inc	760	<p>Amend</p> <p>The submitter believes there is insufficient information published about the affected species in Taranaki waters, and discussion about the effects.</p> <p>Submitter seeks amendment to Rule 12 of the Plan to require a higher level of regulatory control and prohibit seismic surveying or bathymetric testing activity (currently a Permitted Activity).</p>	<p>Decline</p> <p>Officers recommend declining the relief.</p> <p>Seismic surveying and bathymetric testing provide useful and important insights into crustal activities that occur within the Taranaki region and are not limited to industrial uses within the petroleum industry. Not only are these insights useful but they are also necessary as they provide information relating to the tectonic situation of the region, including faults, flexure and crustal thickening relating to the overarching tectonic regime of the Zealandia continent. Such information is necessary for hazard mitigation and preparation including earthquake, tsunami and</p>
Further submissions – Climate Justice Taranaki Inc (21), Te Korowai o Ngāruahine Trust (41), Te Rūnanga o Ngāti Ruanui Trust (61)		Support	

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Further submissions – Petroleum Exploration and Production Association of New Zealand (37)		Oppose	<p>volcanic activity as well as providing insights into the past events that occurred in geologic time.</p> <p>The Council recognises that a number of submitters are concerned by the potential effects of seismic surveying and bathymetric testing, primarily in relation to disturbance of marine organisms. However, rules within the Plan should consider the activity and anticipated effects rather than the purpose. The effects of seismic and bathymetric testing are generally minor and transitory. As it stands, the rule promotes consistent policy across the territorial sea and exclusive economic zone. To make monitoring activities obtain a resource consent because it is linked to a particular lawful commercial activity, irrespective of effects, is not considered appropriate.</p>
51 - Taranaki Energy Watch	761	<p>Amend</p> <p>Submitter seeks amendment to Rule 12 of the Plan to incorporate a precautionary approach.</p>	<p>No relief necessary</p> <p>The submitter has not given precise details as to the amendments sought. However, officers suggest that the effects of this activity are well known and understood to be minor and transitory such that a precautionary approach is not necessary.</p>
Further submissions – Petroleum Exploration and Production Association of New Zealand (37)		Oppose	
52 – Emily Bailey	762	<p>Amend</p> <p>Submitter seeks amendment to Rule 12 of the Plan so that seismic surveying is a Prohibited Activity within the coastal environment.</p>	<p>Decline</p> <p>Officers recommend declining the relief.</p> <p>Seismic surveying and bathymetric testing provide useful and important insights into crustal activities that occur within the Taranaki Region and are not limited to industrial uses within the petroleum industry. Not only are these insights useful but they are also necessary as they provide information relating to the tectonic situation of the region, including faults, flexure and crustal thickening relating to the overarching tectonic regime of the Zealandia continent. Such information is necessary for hazard mitigation and preparation including earthquake, tsunami and volcanic activity as well as providing insights into the past events that occurred in geologic time.</p> <p>The Council recognises that a number of submitters are concerned by the potential effects of seismic surveying and bathymetric testing, primarily in relation to disturbance of marine organisms. However, rules within the Plan should consider the activity and anticipated effects rather than the purpose. The effects of seismic and bathymetric testing are generally minor and transitory. As it stands, the rule promotes consistent policy across the territorial sea and exclusive economic zone.</p>
Further submissions – Trans-Tasman Resources, Petroleum Exploration and Production Association of New Zealand (37)		Oppose	
Further submissions – Climate Justice Taranaki Inc (21)		Support	

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
			To make monitoring activities obtain a resource consent because it is linked to a particular lawful commercial activity, irrespective of effects, is not considered appropriate.
56 – Greenpeace	763	Amend Submitter opposes Rule 12 of the Plan in which the Activity Classification for testing and bathymetric testing is a Permitted Activity.	Decline Officers recommend declining the relief. Seismic surveying and bathymetric testing provide useful and important insights into crustal activities that occur within the Taranaki Region and are not limited to industrial uses within the petroleum industry. Not only are these insights useful but they are also necessary as they provide information relating to the tectonic situation of the region, including faults, flexure and crustal thickening relating to the overarching tectonic regime of the Zealandia continent. Such information is necessary for hazard mitigation and preparation including earthquake, tsunami and volcanic activity as well as providing insights into the past events that occurred in geologic time.
Further submissions – Climate Justice Taranaki Inc (21)		Support in part	The Council recognises that a number of submitters are concerned by the potential effects of seismic surveying and bathymetric testing, primarily in relation to the impacts of oil and gas exploration and/or seabed mining and the disturbance of marine organisms. However, rules within the Plan should consider the activity and anticipated effects rather than the purpose. The effects of seismic and bathymetric testing are generally minor and transitory. As it stands, the rule promotes consistent policy across the territorial sea and exclusive economic zone. To make monitoring activities obtain a resource consent because it is linked to a particular lawful commercial activity, irrespective of effects, is not considered appropriate.
Further submissions – Petroleum Exploration and Production Association of New Zealand (37)		Oppose	
Further submissions – Te Korowai o Ngāruahine Trust (41), Te Rūnanga o Ngāti Ruanui Trust (61)		Support	
57 – Kiwis Against Seabed Mining	764	Amend Submitter opposes Rule 12 of the Plan in which the Activity Classification for testing and bathymetric testing is a Permitted Activity.	Decline Officers recommend declining the relief. Sought by the submitter Seismic surveying and bathymetric testing provide useful and important insights into crustal activities that occur within the Taranaki Region and are not limited to industrial uses within the petroleum industry. Not only are these insights useful but they are also necessary as they provide information relating to the tectonic situation of the region, including faults, flexure and crustal thickening relating to the overarching tectonic regime of the Zealandia continent. Such information is necessary for hazard mitigation and preparation including earthquake, tsunami and volcanic activity as well as providing insights into the past events that occurred in geologic time.
Further submissions – Climate Justice Taranaki Inc (21)		Support in part	
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Support	

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
			The Council recognises that a number of submitters are concerned by the potential effects of seismic surveying and bathymetric testing, primarily in relation to disturbance of marine organisms. However, rules within the Plan should consider the activity and anticipated effects rather than the purpose. The effects of seismic and bathymetric testing are generally minor and transitory. As it stands, the rule promotes consistent policy across the territorial sea and exclusive economic zone. To make monitoring activities obtain a resource consent because it is linked to a particular lawful commercial activity, irrespective of effects, is not considered appropriate.
58 – Te Atiawa	765	<p>Amend</p> <p>Submitter is concerned that noise and vibration associated with seismic surveying and bathymetric testing may result in adverse impacts on taonga species such as kororā (little blue penguin) and tohorā (whales).</p> <p>Submitter seeks amendment to 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.</p> <p>AND</p> <p>Add a further condition to ensure no adverse effects on cultural values associated with sites identified in Schedules 5A and 5B.</p>	<p>Decline</p> <p>Officers recommend declining the relief sought by the submitter.</p> <p>Seismic surveying and bathymetric testing provide useful and important insights into crustal activities that occur within the Taranaki Region and are not limited to industrial uses within the petroleum industry. Not only are these insights useful but they are also necessary as they provide information relating to the tectonic situation of the region, including faults, flexure and crustal thickening relating to the overarching tectonic regime of the Zealandia continent. Such information is necessary for hazard mitigation and preparation including earthquake, tsunami and volcanic activity as well as providing insights into the past events that occurred in geologic time.</p>
Further submissions – Trans-Tasman Resources (6), Petroleum Exploration and Production Association of New Zealand (37)		Oppose	The Council recognises that a number of submitters are concerned by the potential effects of seismic surveying and bathymetric testing, primarily in relation to the impacts of oil and gas exploration and/or seabed mining and the disturbance of marine organisms. However, rules within the Plan should consider the activity and anticipated effects rather than the purpose. The effects of seismic and bathymetric testing are generally minor and transitory. As it stands, the rule promotes consistent policy across the territorial sea and exclusive economic zone. To make monitoring activities obtain a resource consent because it is linked to a particular lawful commercial activity, irrespective of effects, is not considered appropriate.
Further submissions – Climate Justice Taranaki Inc (21)		Support in part	
Further submissions – Te Korowai o Ngāruahine Trust (41), Te Rūnanga o Ngāti Ruanui Trust (61)		Support	
	766	Amend	Decline

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
61 – Te Rūnanga o Ngāti Ruanui Trust		<p>Submitter seeks amendment to Rule 12 of the Plan to make seismic surveying or bathymetric testing activity a Discretionary Activity (rather than a Permitted Activity) and include standards, terms and conditions to read:</p> <p>(a) survey complies with 2013 Code of Conduct for Minimising Acoustic Disturbance to Marine Mammals from Seismic Survey Operations or any subsequent applicable Code of Conduct; discharge does not adversely affect the matters/values identified for protection by mana whenua in the cultural impact assessment;</p> <p>(b) Taranaki Regional Council is informed of the activity at least five working days before commencement by entering details of the activity at www.trc.govt.nz/informcouncil discharge complies with tangata whenua indicators referred to in the tangata whenua monitoring plan;</p> <p>with regards to bathymetric testing:</p> <p>(c) activity does not have an adverse effect on marine mammals; discharge is consistent with iwi management plan.</p> <p>AND</p> <p>Include the following notification note:</p> <p>Resource consent applications under this Rule will be notified to tangata whenua.</p>	<p>Officers recommend declining the relief sought by the submitter.</p> <p>Seismic surveying and bathymetric testing provide useful and important insights into crustal activities that occur within the Taranaki Region and are not limited to industrial uses within the petroleum industry. Not only are these insights useful but they are also necessary as they provide information relating to the tectonic situation of the region, including faults, flexure and crustal thickening relating to the overarching tectonic regime of the Zealandia continent. Such information is necessary for hazard mitigation and preparation including earthquake, tsunami and volcanic activity as well as providing insights into the past events that occurred in geologic time.</p> <p>The Council recognises that a number of submitters are concerned by the potential effects of seismic surveying and bathymetric testing, primarily in relation to the impacts of oil and gas exploration and/or seabed mining and the disturbance of marine organisms. However, rules within the Plan should consider the activity and anticipated effects rather than the purpose. The effects of seismic and bathymetric testing are generally minor and transitory. As it stands, the rule promotes consistent policy across the territorial sea and exclusive economic zone. To make monitoring activities obtain a resource consent because it is linked to a particular lawful commercial activity, irrespective of effects, is not considered appropriate.</p>
Further submissions – Trans-Tasman Resources (6), Petroleum Exploration and Production Association of New Zealand (37)		Oppose	
Further submissions – Climate Justice Taranaki Inc (21)		Support in part	
Rule 13 – Other discharges			
8 – Silver Fern Farms	767	<p>Support</p> <p>Retain Rule 13 of the Plan as a 'catch-all' to provide for discharges to coastal waters not otherwise covered by other rules.</p>	<p>Accept</p> <p>Support noted.</p>
Further submissions – Federated Farmers (2)		Support	

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Further submissions – Climate Justice Taranaki Inc (21)		Oppose	
26 – Transpower NZ Ltd	768	Amend	Accept
		<p>Submitter supports Rule 13 of the Plan but explains that the <i>National Environmental Standards for Electricity Transmission</i> activities only applies to existing National Grid structures and since there are no existing National Grid structures in the coastal marine area (as identified in the Proposed Coastal Plan for Taranaki) and therefore subject to the Plan, the reference is not required. Further, the <i>National Environmental Standards for Electricity Transmission</i> is not applicable when erecting or placing new structures so is redundant to mention within the Plan.</p> <p>Submitter seeks amend to Rule 13 to delete reference to <i>National Environmental Standards for Electricity Transmission Activities</i>:</p> <p>[...] or the Resource Management (National Environmental Standards for Electricity Transmission Activities Regulations 2009 (Appendix 6))</p>	The reference to the <i>National Environmental Standards for Electricity Transmission</i> is redundant and does not add further value to the Plan. Officers recommend granting the relief sought by the submitter.
46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	769	Amend	Accept
		<p>Retain Rule 13 of the Plan subject to amendment and the addition of a note as follows:</p> <p><u><i>A discharge into a district council managed stormwater system is a discharge to land outside the coastal marine area and an assessment for consent requirement should be made under the Freshwater Plan not this rule.</i></u></p>	Officers agree to the requested amendment as it provides useful guidance for Plan users.
Further submissions – Climate Justice Taranaki Inc (21)		Oppose	
Further submissions – Transpower NZ Ltd (26)		Support	
47 – Fonterra	770	Support	Accept
		Retain Rule 13 of the Plan as notified.	Support noted.
Further submissions – Climate Justice Taranaki Inc (21)		Oppose	
Rules 13 and 14 – Other discharges			

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
6 – Trans-Tasman Resources Ltd	771	Support Retain Rules 13 and 14 of the Plan 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).	Accept Support noted.
Further submissions – Port Taranaki Ltd (32)		Support	
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Oppose	
21 – Climate Justice Taranaki	7772	Amend Submitter opposes Rules 13 and 14 of the Plan.	Decline No precise details of amendments sought to the Plan have been provided and the submitter is seeking clarification/examples of the types of contaminants that would fall under these ‘catch-all’ rules. The submitter questions whether Rules 13 and 14 are designed to capture contaminant discharge from industrial facilities such as Fonterra and Methanex plants. Officers are unclear as to what is sought in this relief. However, officers note that the intent of Rules 13 and 14 is to provide a consenting pathway for discharge activities that do not come within or comply with other rules in the Plan. It acknowledges that Plans will rarely be able to predict all foreseeable and unforeseeable activities that might occur over the life of the Plan and allows unforeseen activity types to be considered as part of a consenting regime. It is not feasible to identify contaminant types but would potentially cover discharges from larger industrial premises (so long as they do not trigger other rules, e.g. wastewater rules). Of note, together Rules 13 and 14 provide a much higher level of protection than otherwise provided by the RMA, where, in the absence of a rule, a resource consent is required (as a Discretionary Activity). Discharges to Outstanding Value, Estuaries Unmodified and Estuaries Modified coastal management areas are a Non-complying Activity pursuant to Rule 14.
Further submissions – Trans-Tasman Resources (6)		Oppose	
Further submissions – Te Rūnanga o Ngāti Mutunga (40), Te Korowai o Ngāruahine Trust (41), Te Atiawa (58), Te Rūnanga o Ngāti Ruanui Trust (61)		Support	
	773	Amend	No relief necessary

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
21 – Climate Justice Taranaki		Submitter questions compliance and enforcement responses and seeks that if such 'catch-all' rules are to remain, then Rule 13 of the Plan for the relevant discharge activities should be Publicly Notified.	Officers do not consider it appropriate to include this level of operational detail in the Plan but note that in accordance with its standard operating procedures, such discharge activities are already publicly notified. Officers note that this Council is consistently identified in the National Monitoring System as having strong compliance and enforcement responses.
33 – New Zealand Defence Force	774	<p>Amend</p> <p>Submitter seeks amendment to Rules 13 and 14 of the Plan by inserting a new rule permitting minor discharges (similar to Rule 53 regarding minor disturbance and removal), which would provide for the operation of the portable water units;</p> <p>OR</p> <p>inserting a new rule specifically permitting discharges from the operation of portable water treatment units, such as:</p> <p><u><i>the discharge of contaminants or water to the coastal marine area from portable water treatment units for the purpose of temporary military training activities is a permitted activity.</i></u></p>	<p>Accept in kind</p> <p>The submitter notes that New Zealand Defence Force training within the coastal environment can involve the use of portable water treatment units and it is important that personnel are fully trained in the use of these units. Minor discharges to the coastal marine area have little effect on coastal water quality and that tidal wave action will rapidly disperse the discharges so there is unlikely to be a noticeable difference in water quality within a few meters of the discharge point. Other discharges of this nature could include cooling water use on vessels.</p> <p>Officers recommend granting the relief sought in kind by including a new Rule 1A that allows, as a Permitted Activity, the discharge of uncontaminated water into the coastal marine area. This would be the equivalent of a rule in the current Freshwater Plan and is consistent with the approach adopted by other regional councils.</p> <p><u>Activity description</u></p> <p><u><i>Discharge of water on the foreshore, seabed or into waters of the coastal marine area.</i></u></p> <p><u>Standards/terms/conditions</u></p> <p><u><i>(a) The discharge is unchanged, by intent or omission, from its previous state prevailing when previously abstracted for use.</i></u></p> <p><u><i>(b) The discharge does not result in permanent physical damage to the foreshore and seabed.</i></u></p>
44 – Nga Motu Marine Reserve Society Inc	775	<p>Amend</p> <p>Submitter seeks amendment to 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).</p>	<p>Decline</p> <p>Refer to submission point 760 in relation to officers' response on prohibiting seismic surveying or bathymetric testing activities.</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Support	<p>In relation to amending Rules 13 and 14 to provide a higher level of regulatory control, officers note that the rules are already very restrictive.</p> <p>Officers note that the intent of Rules 13 and 14 is to provide a consenting pathway for discharge activities that do not come within or comply with other rules in the Plan. It acknowledges that Plans will rarely be able to predict all foreseeable and unforeseeable activities that might occur over the life of the Plan and allows unforeseen activity types to be considered as part of a consenting regime. It is not feasible to identify contaminant types but would potentially cover discharges from industrial premises (so long as they do not trigger other rules, e.g. wastewater rules).</p> <p>Of note, together Rules 13 and 14 provide a much higher level of protection than otherwise provided by the RMA, where, in the absence of a rule, a resource consent is required (as a Discretionary Activity). Under the Plan, discharges to Outstanding Value, Estuaries Unmodified and Estuaries Modified coastal management areas are a Non-complying Activity pursuant to Rule 14.</p>
61 – Te Rūnanga o Ngāti Ruanui Trust	776	<p>Amend</p> <p>Submitter seeks amendment to Rule 13 (Discretionary Activity) and 14 (Non-complying Activity) of the Plan to include standards/terms/conditions to read:</p> <p><i><u>(a) discharge does not adversely affect the matters/values identified for protection by mana whenua in the cultural impact assessment;</u></i></p> <p><i><u>(b) discharge complies with tangata whenua indicators referred to in the tangata whenua monitoring plan</u></i></p> <p><i><u>(c) discharge is consistent with iwi management plan.</u></i></p> <p>AND</p> <p>Include the following notification note:</p> <p><i><u>Resource consent applications under this Rule will be notified to tangata whenua.</u></i></p>	<p>Decline</p> <p>The submitter has sought the inclusion of standards, terms and conditions for rules in the Plan relating to Discretionary and Non-complying Activities.</p> <p>Officers decline the relief noting that it is not standard planning practice for Discretionary Activity or Non-complying Activity rules to include standards, terms and conditions. Conditions relating to a Discretionary Activity are developed on a case-by-case basis through the consenting process having regard to the relevant Plan policies.</p> <p>Officers note that all matters identified by the submitter would be considered through the consenting process with Policies 1 to 21, 22, 30, 39, 40 and 41 being given effect to.</p> <p>In relation to notification requirements proposed by the submitter, officers note that the Plan is not intended to provide the operational detail for implementing every aspect of the Plan. Such detail is more appropriately included in the Council's standard operating procedures and/or any Mana Whakahono a Rohe agreements.</p>
Further submissions – Trans-Tasman Resources (6)		Oppose	
Further submissions – Climate Justice Taranaki Inc (21), Te Rūnanga o Ngāti Mutunga (40), Te Korowai o Ngāruahine Trust (41), Te Atiawa (58)		Support	

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Rule 14 – Other discharges			
26 – Transpower NZ Ltd	777	<p>Amend</p> <p>Submitter supports Rule 14 of the Plan but explains that the <i>National Environmental Standards for Electricity Transmission</i> activities only applies to existing National Grid structures and since there are no existing National Grid structures in the coastal marine area (as identified in the Proposed Coastal Plan for Taranaki) and therefore subject to the Plan, the reference is not required. Further, the <i>National Environmental Standards for Electricity Transmission</i> is not applicable when erecting or placing new structures so is redundant to mention within the Plan. Submitter seeks amend to Rule 14 to delete reference to <i>National Environmental Standards for Electricity Transmission Activities</i>:</p> <p>[...] or the Resource Management (National Environmental Standards for Electricity Transmission Activities Regulations 2009 (Appendix 6))</p>	<p>Accept</p> <p>The reference to the <i>National Environmental Standards for Electricity Transmission</i> is redundant and does not add further value to the Plan. Officers recommend granting the relief sought by the submitter.</p>
46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	778	<p>Amend</p> <p>Retain Rule 14 of the Plan subject to the addition of a note to read:</p> <p><u><i>A discharge into a district council managed stormwater system is a discharge to land outside the coastal marine area and an assessment for consent requirement should be made under the Freshwater Plan not this rule.</i></u></p>	<p>Accept</p> <p>Officers recommend granting the relief sought by the submitter as it provides useful direction for Plan users.</p>
Further submissions – Transpower NZ Ltd (26)		Support	
Rule 15 – Storage or transfer of cargo materials within the Port air zone			
32 – Port Taranaki	779	<p>Amend</p> <p>Submitter seeks amendment to Rule 15 of the Plan to:</p> <ul style="list-style-type: none"> read: <i>Storage and transfer of cargo materials within the Port Air Zone involving discharge of contaminants to air <u>and water.</u></i> amend the standard/terms/conditions to refer to discharges to water as per G2.11 of the operative Plan. <p>OR</p>	<p>Accept</p> <p>Submitter recognises that Rule 15 provides for the discharge to air of contaminants from the storage and transfer of cargo within the Port Air Zone as a Permitted Activity and includes dust discharges to air from products such as animal feed that is transferred from ships via ship cranes to the wharves. The operative Coastal Plan provides for the discharge of this product in the same circumstances to air and water via the General Rule G2.11(a) of the current Plan. This rule has not been translated across to the Proposed Coastal Plan. It is considered that the effect on the environment from the discharge of contaminants from the storage and</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		Provide an exception for contaminant discharges from storage and transfer of animal feed cargo to water from storage and transfer to/from ships to wharves (such a rule could be placed before Rule 13).	transfer of animal feed cargo to air and water in the Port Air Zone is minimal and is essentially fish feed. Officers recommend granting the relief sought by amending the Activity Description of Rule 15 to read as follows: <i>Storage and transfer of cargo materials within the Port Air Zone involving discharge of contaminants to air <u>or water</u>.</i>
Rule 16 – Storage or transfer of cargo materials within the Port air zone			
32 – Port Taranaki	780	<p>Amend</p> <p>Submitter seeks amendment to Rule 16 of the Plan to:</p> <ul style="list-style-type: none"> read: <i>Storage and transfer of cargo materials within the Port Air Zone involving discharge of contaminants to air <u>and water</u> that does not come within or comply with Rule 15.</i> amend the standard/terms/conditions to refer to discharges to water as per G2.11 of the operative Plan. <p>OR</p> <p>Provide an exception for contaminant discharges from storage and transfer of animal feed cargo to water from storage and transfer to/from ships to wharves (such a rule could be placed before Rule 13).</p>	<p>Accept</p> <p>For the same reasons outlined in the submitters requested relief for Rule 15, the submitter is seeking an equivalent change in Rule 16.</p> <p>Officers recommend granting the relief sought by amending the Activity Description of Rule 15 to read as follows: <i>Storage and transfer of cargo materials within the Port Air Zone involving discharge of contaminants to air <u>or water</u>.</i></p>
Rule 17 – Other discharges to air			
37 – Petroleum Exploration and Production Association of NZ	781	<p>Amend</p> <p>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.</p> <p>Submitter highlights such a rule provided in the Greater Wellington Regional Coastal Plan that reads as follows: <i>“The venting of draignage 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.</i> <i>Conditions</i></p>	<p>Decline</p> <p>Officers recommend declining the relief sought by the submitter.</p> <p>Officers are unclear as to how these activities would not have been canvassed and addressed as part of the consenting process for discharges from the production facilities into the coastal marine area. Officers will be seeking further information from the submitter on this issue as part of the pre-hearing consultation process.</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		<p>(1) <i>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.</i></p> <p>In addition, the submitter points out that the definition of "industrial trade premises" is vague and could include many things. One interpretation could even stretch as far as to include vessels, as they are typically "used for industrial trade purposes".</p>	
Further submissions – Climate Justice Taranaki Inc (21), Taranaki Energy Watch (51)		Oppose	
47 – Fonterra	782	Support	Accept
		Retain Rule 17 of the Plan as notified.	Support noted
Further submissions – Port Taranaki Ltd (32)		Support	
61 – Te Rūnanga o Ngāti Ruanui Trust	783	Amend	Decline
		<p>Submitter seeks amendment to Rule 17 of the Plan to include standards, terms and conditions to read:</p> <p><i>(a) discharge does not adversely affect the matters/values identified for protection by mana whenua in the cultural impact assessment</i></p> <p><i>(b) discharge complies with tangata whenua indicators referred to in the tangata whenua monitoring plan</i></p> <p><i>(c) discharge is consistent with iwi management plan.</i></p> <p>AND</p> <p>Include the following notification note:</p> <p><i>Resource consent applications under this Rule will be notified to tangata whenua.</i></p>	<p>The submitter has sought the inclusion of standards, terms and conditions for rules in the Plan relating to Discretionary and Non-complying Activities.</p> <p>Officers decline the relief noting that it is not standard planning practice for Discretionary Activity or Non-complying Activity rules to include standards, terms and conditions. Conditions relating to a Discretionary Activity are developed on a case-by-case basis through the consenting process having regard to the relevant Plan policies.</p> <p>Officers note that all matters identified by the submitter would be considered through the consenting process with Policies 1 to 21 and 20, 29 and 30 being given effect to</p> <p>In relation to notification requirements proposed by the submitter, officers note that the Plan is not intended to provide the operational detail for implementing every aspect of the Plan. Such detail is more appropriately included in the Council's standard operating procedures and/or Mana any Whakahono a Rohe agreements.</p>
Further submissions – Climate Justice Taranaki Inc (21), Te Korowai o Ngāruahine Trust (41)		Support	
Rule 18 – Outfall structure placement			
	784	Amend	Decline

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
21 – Climate Justice Taranaki		Submitter opposes permitting the placement of outfall structures in the coastal marine area 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.	<p>The submitter contends that without a resource consent it is impossible to know whether the standards, terms and conditions are met.</p> <p>Officers note that this rule is specific to managing the effects of a structure rather than the effects of a discharge. The placement of such structures generally has less than minor effects and (as for any permitted activity) is still subject to compliance with standards, terms and conditions. The discharge of stormwater and wastewater is addressed by other rules.</p> <p>In relation to the management of small outfall <u>structures</u>, Officers note that the rule includes a notification requirement so that the Council can monitor the activity if need be. Notwithstanding the above, the Council operates a process where any member of the public is able to notify the Council of a suspected breach of compliance. Elevating the activity classification and requiring a resource consent would not be cost or time efficient and officers do not believe the risks of the activity are sufficient to warrant this.</p>
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Support	
29 – Department of Conservation	785	<p>Amend</p> <p>Submitter seeks amendment to Rule 18 of the Plan to exclude its application to Outstanding Value and Estuaries Unmodified coastal management areas.</p>	<p>Decline</p> <p>Officers recommend declining the relief sought as being unnecessarily restrictive. Officers note that this rule is specific to managing the effects of a structure rather than the effects of a discharge. The placement of such structures generally has less than minor effects and (as for any permitted activity) is still subject to compliance with standards, terms and conditions. The discharge of stormwater and wastewater is addressed by other rules.</p>
Further submissions – Climate Justice Taranaki Inc (21), Royal Forest and Bird Protection Society (43), Te Rūnanga o Ngāti Ruanui Trust (61)		Support	
32 – Port Taranaki	786	<p>Amend</p> <p>Submitter seeks amendment to Rule 18(a) of the Plan to read: <i>(a) structure has a maximum internal diameter of 450300mm and extends a maximum of 0.5m seaward of the line of mean high water springs; [...]</i></p>	<p>Decline</p> <p>Submitter considers the maximum outfall diameter threshold is unreasonably low and seeks amendment to Rule 18(a). Officers acknowledge that the size restriction is more restrictive than the current Plan. However, as part of the Coastal Plan review it is believed appropriate to reduce the size of outfall structures authorised as a Permitted Activity. This recognises the risk that larger diameter outfall pipes may produce more significant adverse effects. Pipes larger than 150mm are caught by Rules 33 and 34 and are required to go through a consenting process for their placement.</p>
	787	Amend	Decline

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
40 – Te Rūnanga o Ngāti Mutunga		<p>Submitter has concerns regarding the complexity of this Permitted Activity and feel that this activity may be better managed as a Discretionary or Controlled Activity to ensure that the associated conditions are fully understood and can be monitored by the Council. With regards to contacting the Council before the commencement of the activity, the submitter is unsure what the process would be should the activity be found to be non-compliant with the conditions. The submitter feels that this issue would be better managed and monitored through the consent process which provides for longer timelines and means that hapū/iwi can be involved in the decision making process and subsequent monitoring if appropriate.</p> <p>Submitter opposes allowing the placement of outfall structures in the coastal marine area as a Permitted Activity and seek that such activities be a Discretionary Activity.</p>	<p>Officers note that Rule 18 is specific to managing the effects of a structure rather than the effects of a discharge. The discharge of stormwater and wastewater is addressed by other rules.</p> <p>In relation to the management of small outfall <u>structures</u>, officers note that the rule includes a notification requirement so that the Council can monitor the activity if need be. Notwithstanding the above, the Council operates a process where any member of the public is able to notify the Council of a suspected breach of compliance. Elevating the activity classification will not be cost or time efficient and officers do not believe the risks are sufficient to warrant this.</p> <p>Officers do not consider it appropriate to require a consent to place small outfall structure. This activity is considered fairly standard and routine with any adverse effects generally being temporary and minor. The Council has not encountered significant issues with the placement as governed by the current Plan and therefore do not consider it appropriate or necessary to require all outfall structures to be a Discretionary Activity.</p>
Further submissions – Climate Justice Taranaki Inc (21), Te Korowai o Ngāruahine Trust (41), Te Rūnanga o Ngāti Ruanui Trust (61)		Support	
41 – Te Korowai o Ngāruahine Trust	788	<p>Amend</p> <p>Submitter supports the inclusion of Condition (e) in Rule 18 of the Plan addressing historic heritage but seek further dialogue on how adverse effects will be considered in practice. If agreement cannot be reached amend Rule 18 to make this rule a Discretionary Activity (rather than Permitted Activity).</p>	<p>No relief necessary</p> <p>Officers will be discussing this issue with the submitter during the pre-hearing consultation process.</p> <p>Officers note that Rule 18 is specific to managing the effects associated with the placement of a structure rather than the effects of a discharge. The discharge of stormwater and wastewater is addressed by other rules.</p>
Further submissions – Climate Justice Taranaki Inc (21), Te Rūnanga o Ngāti Ruanui Trust (61)		Support	
42 – Ngati Hine Hapu of Te Atiawa	789	<p>Amend</p> <p>Submitter does not accept that structures may be placed over kaimoana reefs as a permitted activity without iwi/hapū consideration notwithstanding the standards, terms and conditions that are in place.</p> <p>Submitter seeks amendment to Rule 18 of the Plan to make outfall structure placement a Discretionary Activity or at least a Controlled Activity (rather than a Permitted Activity)</p> <p>AND</p>	<p>Decline</p> <p>Officers acknowledge the concerns of the submitter and note that such structures will not extend to any reef system within the coastal marine area. Officers refer the submitter to Condition (j) which requires the placement of the structure to not have adverse effects on the values associated with historic heritage identified in Schedule 5 [Historic heritage], which would include kaimoana reefs.</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		that there be iwi/hapū consultation in all cases.	Officers note that this rule is specific to managing the effects of a structure rather than the effects of a discharge. The discharge of stormwater and wastewater is addressed by other rules.
Further submissions – Climate Justice Taranaki Inc (21), Te Korowai o Ngāruahine Trust (41), Te Rūnanga o Ngāti Ruanui Trust (61)		Support	In relation to the management of small outfall structures, officers note that this activity is considered fairly standard and routine with any adverse effects generally being temporary and less than minor. The standards/terms/conditions require that the Council be notified of the instalment of the structure. This notification process allows the Council to be aware of the exact location of such structures and to follow up, if necessary, with any concerns or issues that may arise.
43 – Royal Forest and Bird Protection Society	790	<p>Amend</p> <p>Submitter is concerned that the conditions of Rule 18 do not manage cumulative effects. Of particular concern are areas of Outstanding Value where structures can have adverse effects on natural character and natural features and landscapes.</p> <p>Submitter seeks amendment to Rule 18 of the Plan to:</p> <ul style="list-style-type: none"> • identify sites/areas of significant indigenous biodiversity and include a condition that the structure is not within those areas • amend Condition (c) by adding: activity, and no more than 1m width of surface area is distributed • add a <i>Note: this rule does not authorise a discharge from the outfall structure.</i> 	<p>Accept in Part</p> <p>Officers acknowledge the submitters concerns relating to cumulative effects. It is the experience of the Council that the majority of any effects that occur as a result of placement of small outfall structures are transitory and less than minor. Such activities are considered routine and result in minimal disturbance.</p> <p>Officers believe that the submitters request to identify sites/areas of significant indigenous biodiversity is unnecessary and infers that the placement of outfall structures and the presence of significant indigenous biodiversity is mutually exclusive. Officers do not agree with this view. Notwithstanding that, officers note that Condition (f) provides a high level of protection to significant indigenous biodiversity as already identified in Schedule 4. If this is an issue of mapping (which has been raised by the submitter previously), the submitter is referred to officers' previous comments on the merits of mapping habitats of significant indigenous biodiversity.</p> <p>Officers further note that the <u>placement</u> of small outfall structures is a fairly routine activity that has not, in the experience of the Council, resulted in noticeable adverse effects on the high natural character associated with Outstanding Value and Estuaries Unmodified coastal management areas.</p> <p>Officers do not consider the requested addition to condition (c) necessary.</p> <p>Officers agree to include the requested note as it provides useful guidance for Plan users with minor amendment to read:</p> <p><i><u>Note: this rule does not authorise a discharge from the outfall structure. The discharge rules are Rules 1A to 3 and 5 to 8.</u></i></p>
Further submissions – Climate Justice Taranaki Inc (21)		Support	
58 – Te Atiawa	791	Amend	Accept in part

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		<p>Submitter seeks amendment to Rule 18 of the Plan by including in the standards, terms and conditions a clause that refers to Schedules 5A and 5B</p> <p>AND</p> <p>amend the Activity Classification to a Controlled Activity (rather than a Permitted Activity).</p>	<p>Submitter supports the inclusion of Schedule 5 and 4A of the Plan, however, is uncertain as to how the Council will ensure that these requirements are being met. The submitter requests dialogue to explain how this will be achieved.</p> <p>The <u>placement</u> of small outfall structures is a fairly routine activity that has not, in the experience of the Council, resulted in noticeable adverse effects. Officers are therefore confident that the Permitted Activity Classification is reasonable for this activity. The Council requires notification prior to the commencement of the activity and will maintain a record of all outfall structures placed, this allows for routine check-ups. The Council has additional measures in place to deal with any non-compliance issues that may arise and operates a public notification system that allows any member of public to notify the Council of non-compliance. If non-compliance is recognised the Council will take swift and appropriate enforcement action and the activity will require a consent to continue operation where all non-compliance issues will be dealt with accordingly.</p>
Further submissions – Te Korowai o Ngāruahine Trust (41), Te Rūnanga o Ngāti Ruanui Trust (61)		Support	<p>Notwithstanding the above, officers notes that Rule 18 only covers the placement of a small outfall structure, not the discharge. Any discharge will be governed by the appropriate Rule depending on the content of the discharge, and likely invoke the consenting process as a result.</p> <p>Officers agree to amend reference to Schedule 5 to be Schedules 5A and 5B as requested by the submitter.</p>
61 – Te Rūnanga o Ngāti Ruanui Trust	92	<p>Amend</p> <p>Submitter seeks amendment to Rule 18 of the Plan to include new and amended standard, term and condition to read:</p> <p>[...]</p> <p>(e) the discharge is not placed placement of the structure does not have an adverse effect on the values associated with within cultural and historic heritage identified in Schedule 5 [Cultural and Historic heritage];</p> <p>(f) the structure is not placed at any site identified in Schedule 5B [Sites of significance to Māori and associated values] and Appendix 2;</p> <p>(g) structure does not have adverse effect on Schedules 1 and 2</p> <p>(h) placement of the structure does not have an adverse effect the structure is not placed at any site with 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]; taonga species protected under Taranaki iwi</p>	<p>Accept in part</p> <p>Officers note that Rule 18 is specific to managing the effects associated with the placement of a structure rather than the effects of a discharge. The discharge of stormwater and wastewater is addressed by other rules.</p> <p>In relation to the management of small outfall structures, officers are concerned that the effect of the new and amended conditions would make the rule unnecessarily restrictive and by default redundant in that they preclude the placement of these small outfall structures in any part of the Taranaki coastal marine area.</p> <p>Officers do not consider it appropriate to require a consent to place small outfall structure. This activity is considered fairly standard and routine with any adverse effects generally being temporary and having less than minor effects. Specific comments on the new and amended proposed conditions is as follows:</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		<u>Deed of Settlement including those identified in Schedule 4C [Taonga species and habitat] [...]</u>	
Further submissions – Climate Justice Taranaki Inc (21), Te Korowai o Ngāruahine Trust (41)		Support	<ul style="list-style-type: none"> Officers note that this Rule does not deal with the discharge of the structure, only the placement. Thus, the aspects of discharge will be fully assessed through the appropriate discharge rule. Therefore, the requested amendment to (e) is not considered suitable as Plan users should refer to the appropriate discharge Rule. A guidance note has been included in the Rule to clarify that rule relationship. The submitter proposes to include a new Condition (f), however, the reference to sites of significance to Māori located in Schedule 5B has already been included within standard (e) and it is not necessary to repeat. Schedules 1 and 2 capture the whole coastal marine area plus landward parts of the coastal environment identified as having outstanding natural character or being an outstanding natural feature or landscape. The Condition precludes the placement of small outfall structures in any part of the coastal marine area thereby making it redundant In regards to requested standard (h), officers do not believe that it is necessary to prohibit the location of outfall structures due to the presence of threatened or at risk, or regionally distinctive species. As long as any negative effects towards these species are managed then there is no reason why the structure should not be placed. It is the opinion of officers that, if well managed, the two can co-exist without any adverse effects to either. Notwithstanding that, Officers recommend amending Condition (f) to expand its scope to include reference to scheduled taonga species.
NEW Rule 18A – Outfall structure placement			
29 – Department of Conservation	793	Amend Submitter seeks amendment to the Plan to include a new Controlled Activity rule that specifically addresses outfall structure placement in Outstanding Value and Estuaries Unmodified coastal management areas. The submitter further seeks that Conditions (a), (b), (c), and (d) of Rule 18 should also be conditions for this new rule and that the matters of control should, at a minimum, address any effects on natural character, significant species, historic heritage, and any mitigation of effects on these values.	Decline Officers recommend declining the relief sought. Refer to submission point 785.

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Rule 19 – Mooring structure placement in the Port			
43 – Royal Forest and Bird Protection Society	794	Amend	Decline
		Submitter seeks amendment to the Activity Description of Rule 19 of the Plan to delete the activity provisions for associate disturbance, deposition and discharge.	The disturbance, deposition and discharges referred to in the Activity Description of Rule 20 are incidental to the activity of placing mooring structures in the Port. Council recognises that a small amount of disturbance and deposition is likely to be a consequence of any work on the foreshore and seabed. The Rule therefore seeks to bundle associated activities given that the effects are considered minor, transitory and low risk to the environment.
43 – Royal Forest and Bird Protection Society	795	Amend	Decline
		Submitter seeks amendment to Rule 19 of the Plan to make mooring structure placement in the Port (and not requiring excavation of the seafloor or seabed) a Controlled Activity (rather than a Permitted Activity).	The submitter does not believe that the effects with difference scale of mooring structures and cumulative effects are adequately managed through a Permitted Activity. The submitter wishes this activity to be a Controlled Activity so that the Council can assess whether the conditions are met. As previously noted, the Port is a highly modified area and mooring structures are considered commonplace for such a location. Officers believe that placement of mooring structures in a port are fairly standard and routine and will produce less than minor effects if there are any effects at all. Requiring such activities to get a resource consent seems both unnecessary and restrictive noting that the Port is regionally important infrastructure. Possible effects on indigenous biodiversity and historic heritage values in the vicinity are acknowledged and addressed in Conditions (c) and (d). If the activity cannot appropriately comply with those conditions, a resource consent would be required.
43 – Royal Forest and Bird Protection Society	796	Amend	No relief necessary
		The Port is adjacent to an outstanding landscape and character area, therefore, the submitter seeks amendment to Rule 19 of the Plan to add a condition that the mooring structure does not have an effect on Outstanding Value areas.	Officers note that the Port is already a highly modified environment that is located adjacent to an area of Outstanding Value. Both areas co-exist and the placement of any additional mooring structures will not impact on the natural character of the Sugar Loaf Islands as the activity will be confine to the Port coastal management area.
43 – Royal Forest and Bird Protection Society	797	Amend	No relief necessary
		Submitter seeks amendment to Rule 19 of the Plan to add a condition that the mooring structure must not have adverse effects on the values of scheduled sites	Officers note that this relief is already provided for under Condition (f), which states that the placement of the mooring structure must not have an adverse effect on any threatened or at risk, or regionally distinctive species, or any rare and

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		and areas in the coastal marine area with significant indigenous biodiversity values.	uncommon ecosystem type including those identified in Schedule 4A [Significant species and ecosystems].
58 – Te Atiawa	798	Support	Accept
		Retain Rule 19 of the Plan as notified.	Support noted.
Further submissions – Port Taranaki Ltd (32)		Support	
NEW Rule 19A – Mooring structure placement in the Port			
43 – Royal Forest and Bird Protection Society	799	Amend	Accept in part
		Submitter seeks amendment to 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.	Officers refer the submitter to Rules 23 and 33 which are the catch-all rule for mooring structures not meeting the activity description or standards/terms/conditions. Rule 23 is a Controlled Activity rule for the Port and Officers note that control is reserved over ecological values as directed in Condition (f). Rule 33 is a Discretionary Activity for any structure erection or placement that does not come within or comply with previous relevant rules. Officers recognise that “ecological effects” is not the same wording as requested by the submitter but note that the term covers the protection of indigenous biodiversity. Officers recommend replacing the term “ecological values” with “indigenous biodiversity” to clarify that intent.
Further submissions – Port Taranaki Ltd (32)		Oppose	
Rule 20 – Mooring structure placement			
6 – Trans-Tasman Resources Ltd	800	Support	Accept
		Retain Rule 20 as this rule recognises that some monitoring and sampling activities will be requiring mooring structures, and appropriately provides for them as a Permitted Activity.	Support noted.
29 – Department of Conservation	801	Support	Accept
		The Department of Conservation often uses monitoring moorings in the coastal environment during its operations and supports the permitted classification of mooring structure placement for monitoring or sampling equipment. Retain Rule 20 as notified.	Support noted.

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Further submissions – Port Taranaki Ltd (32)		Support	
40 – Te Rūnanga o Ngāti Mutunga	802	<p>Amend</p> <p>Submitter is opposed to permitting the mooring structures in the coastal marine area for monitoring and sampling purposes and seek that such activities be a Discretionary Activity.</p>	<p>Decline</p> <p>The submitter has concerns regarding the complexity of this Permitted Activity rule and feel that this activity may be better managed as a Discretionary Activity or Controlled Activity to ensure that the associated conditions are fully understood and can be monitored by the Council. With regards to contacting the Council before the commencement of the activity, the submitter is unsure what the process would be should the activity be found to be non-compliant with the conditions. The submitter feels that this issue would be better managed and monitored through the consent process which provides for longer timelines and means that hapū/iwi can be involved in the decision making process and subsequent monitoring if appropriate.</p> <p>Officers would like to note that monitoring and sampling activities will be requiring mooring structures is fairly routine and uncomplicated producing less than minor, if any, potential adverse effects. Due to the straight forward nature of the activity and the low impact that it has, officers do not believe that this activity requires further monitoring or the need to impose unnecessary restrictions and costs on people to obtain a resource consent.</p> <p>Notwithstanding the above, officers are aware that iwi/hapū will be interested to know when such activities are being undertaken and note that the Council have an arrangement with iwi authorities who have requested to be informed of this activity as cited in the activity description.</p> <p>Officers would like to reassure the submitter that if any issues of non-compliance arise the Council will take swift and appropriate enforcement action.</p>
Further submissions – Trans-Tasman Resources (6)		Oppose	
41 – Te Korowai o Ngāruahine Trust	803	<p>Amend</p> <p>Submitter supports the inclusion of Condition (b) addressing historic heritage but seek further dialogue on how adverse effects will be considered in practice. If agreement cannot be reached, submitter seeks amendment to Rule 20 of the Plan to make this rule a Discretionary Activity (rather than Permitted Activity).</p>	<p>No relief necessary</p> <p>Officers will be discussing this issue with the submitter during the pre-hearing consultation process.</p> <p>Officers note that the purpose of Rule 20 is to allow the use of monitoring moorings in the coastal marine area for monitoring or sampling purposes. Effects are generally less than minor. However, conditions do apply to ensure that in the event that an activity must avoid, remedy or mitigate potential adverse effects on historic</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
			heritage or indigenous biodiversity values. If it cannot, a resource consent would be required.
42 – Ngati Hine Hapu of Te Atiawa	804	Amend	Decline
		<p>Submitter cannot accept that structures may be placed on or over kaimoana reefs as a permitted activity without iwi/hapū consideration notwithstanding the standards/terms/conditions that are in place.</p> <p>Submitter seeks amendment to Rule 20 of the Plan to make mooring structure placement a Discretionary or at least a Controlled Activity (rather than a Permitted Activity)</p> <p>AND</p> <p>that there be iwi/hapū consultation in all cases.</p>	<p>Officers acknowledge the concerns of the submitter but note that use of monitoring moorings in the coastal marine area for monitoring or sampling purposes are not invasive activity and produces very little, if any, adverse effects to the environment. Similar effects can be produced from a number of activities that are generally regarded as standard and common place. For example, a vessel dropping anchor. Thus, any effects are considered transitory and localised to the area directly in contact with the structure. Officers also refer the submitter to Condition (b) which requires the placement of the mooring structure to not have adverse effects on the values associated with historic heritage identified in Schedule 5 [Historic heritage], which would include kaimoana reefs. Officers also note the other protections already in place through the standards/terms/conditions.</p> <p>Due to the Permitted Activity status, and that the activity is already allowed subject to compliance with the standards, terms and conditions, officers do not consider it appropriate to require the resource user to consult. However, officers would like to draw the submitters attention to note (1) in the Rule that explains that iwi authorities that have requested to be informed of this activity will be advised by the Council.</p>
Further submissions – Trans-Tasman Resources (6)		Oppose	
43 – Royal Forest and Bird Protection Society	805	Amend	Decline
		<p>Submitter seeks amendment of the heading for Rule 20 of the Plan by adding the word “<i>monitoring</i>”.</p>	<p>Officers see no need to include specific headings for specific rules. The Plan headings deliberately bundles main activities at a high level to capture a suite of rules.</p>
43 – Royal Forest and Bird Protection Society	806	Amend	Decline
		<p>Submitter supports the permitted rule for monitoring and sampling purposes where they are not fixed to the seabed, provided there are no adverse effects on biodiversity values or outstanding character and landscape values. However, the provisions for associated disturbance, deposition and discharge are uncertain and could result in adverse effects that are not addressed by the permitted standards, terms and conditions.</p> <p>Submitter seeks amendment to Rule 20 of the Plan by deleting the Activity provisions for associate disturbance, deposition and discharge.</p>	<p>Officers recommend declining the relief sought by the submitter.</p> <p>Officers do not consider it necessary to remove the reference to associated disturbance, deposition or discharge as covered by Activity Descriptions (b), (c) and (d).</p> <p>Officers note that the disturbance, deposition and discharges referred to in the Activity Description of Rule 20 are those incidental to the placement of mooring structures. The Rule recognises that, during the instalment of mooring monitoring structures, there may be minor and transitory disturbances as a result. The impacts</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
			are generally very minor with the associated effects being similar in kind and magnitude to that associated with a vessel dropping anchor. The rule therefore seeks to bundle associated activities given they are low risk and likely to produce no or, at the most, less than minor effects (i.e. the receiving environment can generally handle the activity with effects being naturally and promptly remedied without the need for further intervention).
43 – Royal Forest and Bird Protection Society	807	<p>Amend</p> <p>Submitter seeks amendment of Rule 20 of the Plan by adding to the Activity Description as follows:</p> <p><i>The placement or removal of a mooring structure placement for monitoring [...]</i></p>	<p>Decline</p> <p>Officers do not recommend granting the relief sought by the submitter. Rule 20 specifically relates to the placement of the structure. Removal of structures is separately addressed under Rule 38.</p> <p>Officers note the reference to “removal” within Condition (a) of Rule 20 that relates to the information requirements to be supplied by the land user. While this is additional information that does not fall within the scope of the Rule gateway, nevertheless it has been included for the reader for certainty and clarity purposes as the information would be required under Rule 38 anyway and ensures Council has all the necessary information for an activity that is generally a short term activity.</p>
43 – Royal Forest and Bird Protection Society	808	<p>Amend</p> <p>Submitter seeks amendment to the standards, terms and conditions to ensure the activity will not occur where it would have adverse effects on values and characteristics to be protected under Policies 8 [Outstanding value], 9 [Natural character] and 14 [Significant indigenous biodiversity] of the Plan.</p>	<p>Decline</p> <p>Officers note that in the development of Plan provisions, consideration has been had to the type and scale of the activity and the associated effects. Officers are satisfied that mooring monitoring structures are unlikely to have more than minor adverse effects on outstanding natural character, features and landscapes, natural character and significant indigenous biodiversity values in the coastal environment. Certainly not at a landscape scale (i.e. the mooring structure and the monitoring or sampling equipment must not occupy an area exceeding 5 m² of the coastal marine area). However, Council recognises that in specific localities unforeseen impacts on significant indigenous biodiversity may occur. Accordingly Condition (c) in Rule 20 applies to protect 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] from unforeseeable impacts.</p>
58 – Te Atiawa	809	<p>Amend</p> <p>Submitter supports the inclusion of Schedule 5 and 4A. However, they are uncertain as to how the Council will ensure that these requirements are being met.</p>	<p>Accept in part</p> <p>Officers recommend amending Rule 20 to reference “Schedules 5A and 5B” as requested by the submitter.</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		<p>The submitter requests dialogue to explain how this will be achieved or request that the Activity Classification is elevated to a Controlled Activity.</p> <p>Submitter seeks amendment to Rule 20 of the Plan by including a condition that refers to Schedules 5A and 5B</p> <p>OR</p> <p>amend the Activity Classification to a Controlled Activity (rather than a Permitted Activity).</p>	<p>The placement of mooring monitoring structures is a small scale activity ((i.e. the mooring structure and the monitoring or sampling equipment must not occupy an area exceeding 5 m² of the coastal marine area), that has not, in the past experience of the Council, resulted in noticeable adverse effects. Due to the straight forward nature of the activity, and the low impacts that it has, officers do not believe that this activity requires further monitoring or the need to impose unnecessary restrictions and costs on people to obtain a resource consent. Officers are confident that the Permitted Activity Classification is reasonable for this activity.</p> <p>Notwithstanding the above, officers are aware that iwi/hapū will be interested to know when such activities are being undertaken and note that the Council have an arrangement with iwi authorities who have requested to be informed of this activity as cited in the activity description.</p> <p>Officers would also like to reassure the submitter that if any issues of non-compliance arise the Council will take swift and appropriate enforcement action.</p>
61 – Te Rūnanga o Ngāti Ruanui Trust	810	<p>Amend</p> <p>Submitter seeks amendment to Rule 20 of the Plan to include new and amended standards, terms and conditions to read:</p> <p><i>(b) the placement of the structure placement of the mooring structure 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];</i></p> <p><i>(c) the placement of the structure and discharge does not have adverse effect on <u>Schedules 1 and 2</u>;</i></p> <p><i>(d) the activity does not occur at any site identified in Schedule 5B [<u>Sites of significance to Māori and associated values</u>] and Appendix 2;</i></p> <p><i>(e) the placement of the structure and discharge does not adversely affect the <u>suitability of the receiving water for customary use and bathing after reasonable mixing</u>;</i></p> <p><i>(f) placement of the mooring structure and the discharge 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 [<u>Significant species and ecosystems</u>]; <u>taonga species protected under Taranaki iwi Deed of Settlement including those identified in Schedule 4C [<u>Taonga species and habitat</u>]</u></i></p>	<p>Accept in part</p> <p>Officers note that this rule is specific to the management of small mooring monitoring structures (i.e. the mooring structure and the monitoring or sampling equipment must not occupy an area exceeding 5 m² of the coastal marine area), Officers are concerned that the effect of the new and amended conditions would make the rule unnecessarily restrictive and have perverse outcomes. The relief seeks to exclude the activity from sites of significance regardless of whether it has any impacts on those values and despite the potential for the activity to contribute to the protection and management of sites of significance (e.g. mahinga kai and pukawa values) or taonga species (presence/absence/abundance).</p> <p>Specific comments on the new and amended proposed conditions are as follows:</p> <ul style="list-style-type: none"> officers refer the submitter to previous comments made on expanding the scope of historic heritage (Schedules 1 and 2 capture the whole coastal marine area plus landward parts of the coastal environment identified as having outstanding natural character or being an outstanding natural feature or landscape. The proposed Condition (c) is too wide ranging, unnecessarily restrictive, and uncertain for Plan users

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		<i>(g) the mooring structure and the monitoring or sampling equipment does not occupy an area exceeding 5m² of the coastal marine area [...]</i>	<ul style="list-style-type: none"> note that the discharges associated with this Rule are only those associated directly with the placement of the structure and there is no need to paraphrase the gateway in the individual conditions the submitter proposes to include a new standard (f), however, the reference to sites of significance to Māori located in Schedule 5B has already been included within Condition (b). It is not necessary to repeat this Condition using different wording. in regards to requested Condition (e), officers do not believe that it is necessary. Again it is noted that these activities are very small scale (<5 m² and the only possible impact on water quality is related to the potential for a little sediment disturbance similar in scale to using an anchor and which would not be noticeable in natural prevailing conditions) in regards to requested Condition (e), officers recommend expanding its scope to include reference to scheduled taonga species.
Further submissions – Trans-Tasman Resources (6)		Oppose	
Further submissions – Te Korowai o Ngāruahine Trust (41)		Support	
Rule 21 – Navigation aid erection and placement			
29 – Department of Conservation	811	<p>Amend</p> <p>Submitter believes that the erection of maritime navigation aids should not be a permitted activity for any member of the public. Instead the activity should be permitted for only the Taranaki Regional Council or its agents, Maritime Mew Zealand or its agents, or Port Taranaki provided that these agencies agree to this responsibility.</p> <p>Submitter seeks amendment to Rule 21 of the Plan to include a new condition before condition (a) to read:</p> <p><i><u>The activity is undertaken by:</u></i></p> <p><i><u>(i) Taranaki Regional Council or its agents; or</u></i></p> <p><i><u>(ii) Port Taranaki; or</u></i></p> <p><i><u>(iii) Maritime New Zealand or its agents.</u></i></p>	<p>Accept</p> <p>Officers agree and recommend granting the relief sought by the submitter.</p>
Further submissions – Trans-Tasman Resources (6)		Oppose	

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Further submissions –Port Taranaki Ltd (32)		Support	
41 – Te Korowai o Ngāruahine Trust	812	Amend	No relief necessary
		Submitter supports the inclusion of Condition (e) addressing historic heritage but seek further dialogue on how adverse effects will be considered in practice. If agreement cannot be reached, submitter seeks amendment to Rule 21 of the Plan to make this rule a Discretionary Activity (rather than Permitted Activity).	Officers will be discussing this issue with the submitter during the pre-hearing consultation process. Officers note that the purpose of Rule 21 is allow for the placement of maritime navigation aids. Such activities provide a useful service and no or very minor adverse effects are likely to arise from this activity. However, in the event of any unforeseen adverse effects, conditions do apply to avoid, remedy or mitigate any adverse effects on historic heritage or indigenous biodiversity values. If the placement of navigation aids cannot comply with all the Permitted Activity conditions then a resource consent would be required.
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Support	
42 – Ngati Hine Hapu of Te Atiawa	813	Amend	Accept in part
		Submitter seeks amendment to Rule 21 of the Plan to make navigation aid erection or placement a Discretionary or at least a Controlled Activity (rather than a Permitted Activity) AND that there be iwi/hapū consultation in all cases.	Officers consider the placement of navigation aids in the coastal marine area a rather straight forward activity, which contributes to maritime health and safety, and for which there are no or less than minor adverse effects. The most likely adverse effect is the temporary disturbance of the seabed from the placement of a small anchor. However, any effects would be transitory and very localised to the area directly in contact with the structure, and not noticeable in natural prevailing marine conditions. Officers do not consider it necessary to elevate the activity status of this Rule to require a resource consent to be obtained due to the negligible risks involved and the protections already in place through the standards, terms and conditions. Officers also direct the submitter to Condition (e) which requires the placement of the mooring structure to not have adverse effects on the values associated with historic heritage identified in Schedule 5 [Historic heritage], which would include kaimoana reefs. Due to the Permitted Activity status it is not appropriate to require the resource user to consult. However, officers would like to draw the submitters attention to note (1) in the Rule that explains that iwi authorities that have requested to be informed of this activity will be advised by the Council.
Further submissions – Trans-Tasman Resources (6)		Oppose in part	
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Support	
	814	Amend	Decline

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
43 – Royal Forest and Bird Protection Society		Submitter seeks amendment to Rule 21 of the Plan by deleting “Outstanding Value” from the coastal management areas covered by the rule.	<p>Submitter supports the permitted rule for these purposes where they are not fixed to the seabed, provided there are no adverse effects on biodiversity values or outstanding character and landscape values. In addition, the potential adverse effects on birds from lighting associated with navigational aids does not appear to be considered within the rule.</p> <p>Officers do not recommend granting the relief sought by the submitter. It is suggested that the erection and placement of navigational aids should be generally provided for in all coastal management areas. This recognises that all the coastal management areas may require navigational aids to ensure the safe and efficient navigation of vessels in those waters.</p> <p>Navigational aids are important items of infrastructure that reduce the risks of ships crashing and vessel related oil spills that may result. It is a safety issue for vessel personnel as well as for the environment and it is imperative that the Plan allow and encourage the safe and appropriate use of such aids.</p> <p>Notwithstanding the above, officers note that adverse effects associated with the placement of maritime navigation aids, if any, are likely to be minor, including potential effects of lighting on birds. Officers further note that the activity is subject to compliance with the standards, terms and conditions, including Condition (f) that requires that there be no adverse effects on significant indigenous biodiversity.</p>
43 – Royal Forest and Bird Protection Society	815	<p>Amend</p> <p>Submitter seeks amendment to the Activity description of Rule 21 of the Plan to ensure there is no disturbance of the foreshore or seabed.</p>	<p>No relief necessary</p> <p>Officers note that Rule 21 does not permit excavation of disturbance of the foreshore or seabed, only minor disturbances that occur as a result of unobtrusive activities during the placement of the structure.</p>
43 – Royal Forest and Bird Protection Society	816	<p>Amend</p> <p>Submitter seeks amendment to Rule 21 by deleting the Activity provisions for associate disturbance, deposition and discharge in the Rule.</p>	<p>Decline</p> <p>The submitter suggests that the provisions for associated disturbance, deposition and discharge are uncertain and could result in adverse effect which are not addressed by the permitted standards, terms and conditions of the rule.</p> <p>Officers note that the disturbance, deposition and discharges referred to in the Activity Description of Rule 21 are considered minor, transitory and inconsequential (i.e. the receiving environment can generally handle the activity with effects being naturally and promptly remedied without the need for further intervention).</p> <p>The Council recognises that, during the instalment of navigation aids, there may be minor and transitory disturbances as a result. The impacts are generally very minor</p>
Further submissions – Trans-Tasman Resources (6)		Oppose	

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
			with the associated effects being similar in kind and magnitude to that associated with a vessel dropping anchor. The rule therefore seeks to bundle associated activities given they are low risk and likely to produce no or, at the most, less than minor effects.
43 – Royal Forest and Bird Protection Society	817	<p>Amend</p> <p>Submitter seeks amendment to Condition (e) of Rule 21 of the Plan to read: <i>[...] erection or placement of the navigation aid does not have an adverse effect on the values associated with is not within 10m of any historic heritage identified in Schedule 5 [Historic heritage] or 50m of an Outstanding Value area [...]</i></p>	<p>Decline</p> <p>Officers note that historic heritage has a broad RMA definition and is not confined to archaeological sites. For historic heritage associated with sites of significance to Māori it is possible to erect or place navigation aids on the 'site' and there will be no adverse effects, e.g. mahinga kai sites. Officers therefore recommend no change to Condition (e).</p> <p>Officers further recommend that the erection and placement of navigational aids should be permitted in all coastal management areas, including those of Outstanding Value, especially considering the high recreational use of some of these areas and the importance of providing for the safe and efficient navigation of vessels in those waters.</p>
43 – Royal Forest and Bird Protection Society	818	<p>Amend</p> <p>Submitter seeks amendment to Rule 21 of the Plan to note that where Condition (e) of is not complied with, a new Rule 33 will apply.</p>	<p>No relief necessary</p> <p>Officers suggest no relief is necessary. Officers note that where Condition (e) (or any other Condition) of Rule 21 cannot be complied with, Rules 33 [Discretionary Activity] and 34 [Non-complying Activity] apply, which requires the activity to be authorised through a resource consent.</p>
43 – Royal Forest and Bird Protection Society	819	<p>Amend</p> <p>Submitter seeks amendment to the standards, terms and conditions of Rule 21 to ensure the activity will not occur where it would have adverse effects on values and characteristics to be protected under Policies 8 [Outstanding value], 9 [Natural character] and 14 [Significant indigenous biodiversity] of the Plan.</p>	<p>No relief necessary</p> <p>Officers note that in the development of Plan provisions, consideration has been had to the type and scale of the activity and the associated effects and officers are satisfied that maritime navigation aid structures are unlikely to have adverse effects on outstanding natural character, features and landscapes, natural character and significant indigenous biodiversity values in the coastal environment. Certainly not at a landscape scale. However, Council recognises that in specific localities unforeseen impacts on significant indigenous biodiversity may occur. Accordingly Condition (f) in Rule 21 applies to protect 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] from unforeseeable impacts.</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
58 – Te Atiawa	820	<p>Amend</p> <p>Submitter seeks amendment to Rule 21 by including a standard, term or condition that refers to Schedules 5A and 5B</p> <p>OR</p> <p>amending the Activity Classification to a Controlled Activity (rather than a Permitted Activity).</p>	<p>Accept</p> <p>Officers note that Condition (e) already refers to “<i>historic heritage</i>” identified in Schedule 5. However, in aligning with granting similar requests sought by the submitter, officers recommend amending references to “<i>Schedule 5</i>” to refer to “<i>Schedules 5A and 5B</i>”.</p> <p>The activity described is a fairly routine activity that has not, in the past experience of the Council, resulted in significant adverse effects. Officers are therefore confident that the Permitted Activity Classification is reasonable for this activity. Of note, the Rule requires notification prior to the commencement of the activity and will maintain a record of all navigation aids placed, this allows for routine check-ups.</p>
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Support	
61 – Te Rūnanga o Ngāti Ruanui Trust	821	<p>Amend</p> <p>Submitter seeks amendment to Rule 21 of the Plan to include new and amended standards/terms/conditions to read:</p> <p>[...]</p> <p><i>(e) erection or placement of the navigation aid does not have an adverse effect on the values associated with cultural and historic heritage identified in Schedule 5 [Cultural and Historic heritage];</i></p> <p><i>(f) erection or placement of the navigation aid does not have any adverse effect on any site identified in Schedule 5B [Sites of significance to Māori and associated values] and Appendix 2;</i></p> <p><i>(g) the placement of the navigation aid does not adversely affect the suitability of the receiving water for customary use and bathing after reasonable mixing;</i></p> <p><i>(h) erection or placement of the structure navigation aid 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]; taonga species protected under Taranaki iwi Deed of Settlement including those identified in Schedule 4C [Taonga species and habitat]</i></p> <p>[...]</p>	<p>Accept in part</p> <p>Officers note that Rule 21 is specific to the placement of maritime navigation aids. Navigational aids are important items of infrastructure that reduce the risks of ships crashing and vessel related oil spills that may result. It is a safety issue for vessel personnel as well as for the environment and it is imperative that the Plan allow and encourage the safe and appropriate use of such aids.</p> <p>Officers are concerned that the effect of the new and amended conditions would make the rule unnecessarily restrictive and have perverse outcomes. Specific comments on the new and amended proposed conditions are as follows:</p> <ul style="list-style-type: none"> officers refer the submitter to previous comments made on expanding the scope of historic heritage the submitter proposes to include a new standard (f), however, the reference to sites of significance to Māori located in Schedule 5B has already been included within Condition (b). It is not necessary to repeat this Condition using different wording. in regards to requested Condition (g), officers do not believe that it is necessary. Again it is noted that these activities are very small scale and the only possible impact on water quality is related to the potential for a little sediment disturbance similar in scale to using an anchor the effects of which would not be noticeable in natural prevailing conditions)
Further submissions – Te Korowai o Ngāruahine Trust (41)		Support	

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
			<ul style="list-style-type: none"> in regards to requested Condition (h), officers recommend expanding its scope to include reference to scheduled taonga species.
Rule 22 – Network utility structure erection or placement			
12 – Chorus New Zealand Limited	822	<p>Amend</p> <p>Submitter supports the intent of Rule 22 of the Plan. However, the submitter notes that, in some instances, telecommunication cables are buried (through either a mole plough, directional drilling, trenching, jet burying, a chain trench or separate combinations of those), there are other instances where cables are simply laid on the seafloor, and left to natural processes to bury them with shallow depth. The environmental effect of a cable laid on the seafloor is generally of a lesser degree than the aforementioned burying techniques, however, laying a cable on the seafloor is not provided for under Rule 22.</p> <p>Submitter seeks amendment of Activity Description (d) in Rule 22 of the Plan to read:</p> <p><i>(d) a communication or electricity cable that is <u>either buried, laid on the seabed or foreshore</u>, or attached to a bridge, access structure or pole; [...]</i></p>	<p>Decline</p> <p>Officers recommend declining the relief sought by the submitter.</p> <p>Officers note that there are potential risks involved with laying communication or electricity cables on the seabed or foreshore and it poses a potential hazard for vessels anchoring with potentially large adverse effects resulting.</p> <p>Officers suggest that the placement of communication or electricity cables <u>on top</u> of the foreshore and seabed is more appropriately managed through Rules 33 and 34 to provide assurance that the necessary precautions are being taken to ensure safety within the coastal marine area. As a Controlled Activity, the Council would be required to grant the consent subject to meeting the standards, terms and conditions of Rule 22. However, officers suggest that there are wider environmental considerations relating to the occupation of space, and associated disturbance, deposition and discharge activities that also need to be considered and that such matters would be more appropriately addressed as a Discretionary or Non-complying Activity.</p>
13 – Spark New Zealand Trading Limited	823	<p>Amend</p> <p>Submitter supports the intent of Rule 22 of the Plan. However, the submitter notes that, in some instances, telecommunication cables are buried (through either a mole plough, directional drilling, trenching, jet burying, a chain trench or separate combinations of those), there are other instances where cables are simply laid on the seafloor, and left to natural processes to bury them with shallow depth. The environmental effect of a cable laid on the seafloor is generally of a lesser degree than the aforementioned burying techniques, however, laying a cable on the seafloor is not provided for under Rule 22.</p> <p>Submitter seeks amendment of Activity Description (d) in Rule 22 of the Plan to read:</p> <p><i>(d) a communication or electricity cable that is <u>either buried, laid on the seabed or foreshore</u>, or attached to a bridge, access structure or pole; [...]</i></p>	<p>Decline</p> <p>There are potential risks involved with laying communication or electricity cables on the seabed or foreshore and it poses a potential hazard for vessels anchoring with potentially large adverse effects resulting.</p> <p>Officers recommend declining the relief sought by the submitter. Officers suggest that the placement of communication or electricity cables <u>on top</u> of the foreshore and seabed is more appropriately managed through Rules 33 and 34 to provide assurance that the necessary precautions are being taken to ensure safety within the coastal marine area. As a Controlled Activity, the Council would be required to grant the consent subject to meeting the standards, terms and conditions of Rule 22. However, officers suggest that there are wider environmental considerations relating to the occupation of space, and associated disturbance, deposition and discharge activities that also need to be considered and that such matters would be more appropriately addressed as a Discretionary or Non-complying Activity.</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
14 – Vodafone New Zealand Limited	824	<p>Amend</p> <p>Submitter supports the intent of Rule 22 of the Plan. However, the submitter notes that, in some instances, telecommunication cables are buried (through either a mole plough, directional drilling, trenching, jet burying, a chain trench or separate combinations of those), there are other instances where cables are simply laid on the seafloor, and left to natural processes to bury them with shallow depth. The environmental effect of a cable laid on the seafloor is generally of a lesser degree than the aforementioned burying techniques, however, laying a cable on the seafloor is not provided for under Rule 22.</p> <p>Submitter seeks amendment of Activity Description (d) in Rule 22 of the Plan to read:</p> <p><i>(d) a communication or electricity cable that is either buried, laid on the seabed or foreshore, or attached to a bridge, access structure or pole; [...]</i></p>	<p>Decline</p> <p>There are potential risks involved with laying communication or electricity cables on the seabed or foreshore and it poses a potential hazard for vessels anchoring with potentially large adverse effects resulting.</p> <p>Officers recommend declining the relief sought by the submitter. Officers suggest that the placement of communication or electricity cables <u>on top</u> of the foreshore and seabed is more appropriately managed through Rules 33 and 34 to provide assurance that the necessary precautions are being taken to ensure safety within the coastal marine area. As a Controlled Activity, the Council would be required to grant the consent subject to meeting the standards, terms and conditions of Rule 22. However, officers suggest that there are wider environmental considerations relating to the occupation of space, and associated disturbance, deposition and discharge activities that also need to be considered and that such matters would be more appropriately addressed as a Discretionary or Non-complying Activity.</p>
15 – Surfbreak Protection Society	825	<p>Other</p> <p>Submitter seeks 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.</p>	<p>No relief necessary</p> <p>Submitter's comments are noted and have been previously addressed in submission points 443 relating to surfing policies. Policy 19 would be considered as part of any resource consent application under this Rule.</p> <p>Officers note that matters relating to affected and interested party status and limited notification are addressed separately in accordance with the Council's consenting standard operating procedures.</p>
26 – Transpower NZ Ltd	826	<p>Other</p> <p>Submitter supports Rule 22 of the Plan but seek clarification whether Activity Description (d) refers to the cable only and is not the actual support.</p>	<p>No relief necessary</p> <p>Support noted. Officers note that Condition (d) refers to the cable and constituent parts.</p>
Further submissions – Powerco (45)		Support	
29 – Department of Conservation	827	<p>Amend</p> <p>Submitter seeks amendment to Rule 22 of the Plan to remove a "pipeline that is buried" and "a communication or electricity cable that is buried" from the Controlled Activity description AND insert a new Restricted Discretionary rule (see NEW Rule 22A below).</p>	<p>Decline</p> <p>The submitter suggests the burial of pipes and cables may have significantly different levels and types of effects compared with attaching a pipe to a bridge.</p> <p>Officers agree with that assessment but are confident that subject to the standards, terms and conditions of this Controlled Activity rule, any adverse environmental effects are reasonably foreseeable and can be appropriately avoided, remedied or</p>
Further submissions – Powerco (45)		Oppose in part	

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
			mitigated via conditions of a resource consent. Activities that cannot comply with the standards, terms and conditions are more appropriately managed through Rules 33 [Discretionary Activity] and 34 [Non-complying Activity] of the Plan.
40 – Te Rūnanga o Ngāti Mutunga	828	Amend Submitter seeks amendment to Rule 22 of the Plan to make the erection or placement of network utility structures in the coastal marine area a Discretionary Activity (rather than a Controlled Activity) so that Ngati Mutunga and others can be involved in the decision making/resource consent process and also in monitoring of this activity if necessary.	Decline Officers note that this rule seeks to provide for the placement of important network utilities that might criss-cross the coastal marine area pursuant to Policy 6 of the Plan and subject to the appropriate management of adverse effects. Through the consenting process, relevant environmental effects on historic heritage, indigenous biodiversity and use and enjoyment of the coast will be appropriately managed. Other adverse effects within the coastal marine area, e.g. water quality are likely to be less than minor and temporary. Some certainty for these uses is considered appropriate, which would not be the case if the activity was made a Discretionary Activity (with the ability to decline a resource consent application). The Council has not encountered significant issues with the placement of utility structures in the coastal marine area under the current Plan and therefore do not consider it appropriate or necessary to require the placement of network utility structures to be made a Discretionary Activity.
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Support	
41 – Te Korowai o Ngāruahine Trust	829	Amend Submitter seeks amendment to Condition (b) of Rule 22 of the Plan to read: <i>(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; [...]</i>	Accept Officers agree to refer to “Schedule 5” as “Schedule 5A and 5B” as requested by the submitter.
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Support	
42 – Ngāti Hine Hapu of Te Atiawa	830	Amend Submitter supports the activity classification as controlled but seek amendment of Rule 22 to protect reef systems AND that there be iwi/hapū consultation in all cases.	No relief necessary Officers not that this Rule is subject to Condition (c) and Policy 14(b)(iii), which states that activities must avoid significant adverse effects (and avoid, remedy or mitigate other adverse effects) on vulnerable indigenous ecosystems and habitats including reefs. Through the consenting process, conditions will be imposed to manage adverse effects, including the protection of the reef systems. Officers further note that, as part of this Coastal Plan review process, and in relation to 'sites of significance' to Māori (many of which relate to inshore reefs),

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
			Council has already agreed to recognise iwi as an affected party for all resource consent applications. There will be further opportunity to set consultation requirements and expectations as part of the development of any Mana Whakahono a Rohe agreements.
43 – Royal Forest and Bird Protection Society	831	Amend Submitter seeks amendment to Rule 22 of the Plan by changing the rule classification to make the erection or placement of network utility structures in the coastal marine area a Restricted Discretionary Activity (rather than a Controlled Activity).	Decline Officers note that Rule 22 seeks to provide for the placement of important network utilities that might criss-cross the coastal marine area pursuant to Policy 6 of the Plan and subject to the appropriate management of adverse effects. Through the consenting process, relevant environmental effects on historic heritage, indigenous biodiversity and use and enjoyment of the coast will be appropriately managed. Other adverse effects within the coastal marine area, e.g. water quality are likely to be less than minor and temporary. Some certainty for these uses is considered appropriate, which would not be the case if the activity was made a Discretionary Activity (with the ability to decline a resource consent application). The Council has not encountered significant issues with the placement of utility structures in the coastal marine area under the current Plan and therefore do not consider it appropriate or necessary to require the placement of network utility structures to be made a Restricted Discretionary Activity.
Further submissions – Powerco (45), Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd (46)		Oppose in part	
43 – Royal Forest and Bird Protection Society	832	Amend Submitter seeks the inclusion of a standard, term and condition in Rule 22 of the Plan that requires a 100m set back from Outstanding Value coastal management areas.	No relief necessary No precise details of the rationale for the relief sought has been provided, or indeed what the proposed setback distance would achieve. Officers recommend declining the relief sought by the submitter noting that the rule excludes the Outstanding Value coastal management area, and given that most of the activities covered by this rule require the structure to be buried or are small scale. Of note, in the event that this activity is of a type or scale that it could have an impact on Outstanding Values, the Rule reserves control over the location of the work.
Further submissions – Powerco (45), Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd (46)		Oppose in part	
43 – Royal Forest and Bird Protection Society	833	Amend Submitter seeks the inclusion of the following matters of discretion for the amended Rule 22 of the Plan: <i>(x) effect on indigenous biological diversity</i> <i>(y) effects on natural character and natural features and landscape</i>	Accept in part Officers agree in part to the relief sought by the submitter by amending the following matters of discretion in Rule 22 (plus consequential changes to equivalent rules elsewhere in the Plan) to read: <i>(f) effects on ecological natural character, features and landscapes values</i>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		<i>(z) effects on any areas of Outstanding Value.</i>	<i>(fa) effects on indigenous biodiversity values</i>
Further submissions – Te Korowai o Ngāruahine Trust (41)		Support	Officers note the amendments to term “ecological” better aligns with the wording adopted in the General Policies, which refers to “natural character, features and landscapes” and “indigenous biodiversity”. Officers did not feel it necessary to specify areas of outstanding values as this is a subset of natural character, features and landscapes.
Further submissions – Powerco (45), Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd (46)		Oppose in part	
45 – Powerco	834	Support	Accept
		Retain Rule 22 of the Plan as notified.	Support noted.
Further submissions – Port Taranaki Ltd (32)		Support	
Further submissions– Te Rūnanga o Ngāti Ruanui Trust (61)		Oppose	
46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	835	Amend	Accept
		Submitter seeks amendment to the Activity Description of Rule 14 of the Plan to read: <i>Network utility structure erection or placement where the structure is:</i> <i>(a) A pipeline that is buried or attached to a bridge, <u>wharf</u> or access structure [...]</i>	The submitter notes that oil companies have existing pipelines in the coastal marine area and seek clarity that Rule 22 includes wharfs. This will ensure there is an appropriate pathway for new pipelines that may be required in the coastal marine area. Where compliance cannot be achieved with Rule 22, the submitter notes that a discretionary activity consent is required pursuant to Rule 33.
Further submissions – Transpower NZ Ltd (26)		Oppose	Officers note that the definition of “structure” as defined by the RMA means any “...facility made by people and which is fixed to land”. This would include wharfs. For the purposes of certainty and clarity, officers recommend expanding the Activity Description of Rule 14 of the Plan to explicitly identify wharfs.
58 – Te Atiawa	836	Amend	Decline
		Submitter seeks amendment to Rule 22 of the Plan to change the Activity Classification to Discretionary Activity (rather than a Controlled Activity).	Officers note that Rule 22 seeks to provide for the placement of important network utilities that might criss-cross the coastal marine area pursuant to Policy 6 of the Plan and subject to the appropriate management of adverse effects.
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Support	Rule 22 requires such activities to obtain a resource consent. However, some certainty for these uses is considered appropriate, which would not be the case if the activity were made a Discretionary Activity (with the ability to decline a resource consent application).

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
			<p>Through the consenting process, relevant environmental effects on historic heritage, indigenous biodiversity and use and enjoyment of the coast will be appropriately managed. Other adverse effects within the coastal marine area, e.g. water quality are likely to be less than minor and temporary. The Council has not encountered significant issues with the placement of utility structures in the coastal marine area under the current Plan and therefore do not consider it appropriate or necessary to require the placement of network utility structures to be made a Discretionary Activity.</p>
61 – Te Rūnanga o Ngāti Ruanui Trust	837	<p>Amend</p> <p>Submitter seeks amendment to Rule 22 of the Plan to include new and amended standards, terms and conditions to read:</p> <p><i>(a) no erosion or scour results from erection or placement of the structure;</i></p> <p><i>(b) erection or placement of the structure 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];</i></p> <p><i><u>(c) erection or placement of the structure does not have adverse effect on Schedules 1 and 2</u></i></p> <p><i><u>(d) 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></i></p> <p><i><u>(e) does not adversely affect the suitability of the receiving water for customary use</u></i></p> <p><i><u>(f) erection or placement of the structure 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]; <u>and taonga species protected under Taranaki iwi Deed of Settlement including those identified in Schedule 4C [Taonga species and habitat]</u> and</u></i></p> <p><i><u>(g) structure does not adversely affect access to or use of the area surrounding the structure.</u></i></p>	<p>Accept in part</p> <p>Officers note that Rule 22 seeks to provide for the placement of important network utilities that might criss-cross the coastal marine area pursuant to Policy 6 of the Plan and subject to the appropriate management of adverse effects. Through the consenting process, relevant environmental effects on historic heritage, indigenous biodiversity and use and enjoyment of the coast will be appropriately managed. Other adverse effects within the coastal marine area, e.g. water quality are likely to be less than minor and temporary.</p> <p>The submitter seeks to introduce a number of new and amended standards, terms and conditions to the Rule. Specific comments on the new and amended proposed conditions are as follows:</p> <ul style="list-style-type: none"> • decline the relief sought in relation to Condition (b). Officers refer the submitter to previous comments made on expanding the scope of historic heritage • decline the relief sought in relation to Condition (c). Schedules 1 and 2 capture the whole coastal marine area plus landward parts of the coastal environment identified as having outstanding natural character or being an outstanding natural feature or landscape. The proposed Condition (c) is too wide ranging, unnecessarily restrictive, and uncertain for Plan users • relief sought in relation to Condition (d) is unnecessary. The submitter proposes to include a new standard (d), however, the reference to sites of significance to Māori located in Schedule 5B has already been included within Condition (b) of the Plan. It is not necessary to repeat this Condition using different wording.

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
			<ul style="list-style-type: none"> relief sought in relation to Condition (e) is unnecessary. Again such matters are largely already addressed in Condition (b) of the Plan, which protects customary sites of significance. However, it is noted that any impacts on receiving water quality will be temporary and unlikely to be noticeable in natural prevailing conditions) grant the relief in kind in relation to Condition (f). Officers recommend expanding the scope of Rule conditions to include reference to scheduled taonga species.
61 – Te Rūnanga o Ngāti Ruanui Trust	838	<p>Amend</p> <p>Submitter seeks amendment the control and notification column of Rule 22 of the Plan to read:</p> <p>(a) location, method, timing and notification of works;</p> <p>(b) design, construction, maintenance and decommissioning of structure;</p> <p>(c) effects on other authorised structures or activities;</p> <p>(d) sediment movement and erosion;</p> <p><u>(e) effects on matters/values identified for protection by mana whenua in the cultural impact assessment;</u></p> <p>(f) effects on water quality <u>and mauri values;</u></p> <p>(g) effects on ecological values;</p> <p>(h) effects on historic, cultural and amenity values;</p> <p>(i) effects on surf breaks;</p> <p>(j) effects of occupation on public access;</p> <p>(k) effects on navigation;</p> <p>(l) effects of noise and light;</p> <p><u>(m) consistent with iwi management plan;</u></p> <p>(n) monitoring <u>(including tangata whenua indicators referred to in the tangata whenua monitoring plan)</u> and information requirements;</p> <p>(o) duration of consent; and</p> <p>(p) review of consent conditions.</p> <p><u>(q) effects on Cultural Zone (referred to in Spatial Plan)</u></p>	<p>Decline</p> <p>Officers recommend declining the relief sought by the submitter.</p> <p>The suggested changes seem to be mixing jurisdictional, policy and operational matters and introducing a level of specificity that is not considered appropriate or necessary for a Plan. Most of the changes sought are a subset of matters that have already been provided for while the submitter has also introduced some new concepts such as a cultural zone and a spatial plan that do not fit within the Proposed Plan framework. There is also 'requirement' to be consistent with iwi management plans, while the submitter is silent on how other planning documents might also fit within this framework.</p> <p>Officers note that this activity is already subject to the General Policies 1 to 21 of which Policies 15 [Historic heritage] and 16 [relationship of tangata whenua] are particularly relevant. Officers further note that there will be an opportunity to develop an agreed framework and operational detail for implementing the Plan as part of any Mana Whakahono a Rohe agreement with the submitter.</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		<i>Resource consent applications under this Rule will not be publicly notified but may be limited notified.</i>	
Further submissions – Te Rūnanga o Ngāti Mutunga (40), Te Korowai o Ngāruahine Trust (41), Te Atiawa (58)		Support	
NEW Rule 22A – Network utility structure erection or placement			
29 – Department of Conservation	839	<p>Amend</p> <p>Submitter seeks amendment to Plan to include a new Restricted Discretionary rule that 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.</p>	<p>Decline</p> <p>Officers note that Rule 22 already seeks to provide for the placement of important network utilities that might criss-cross the coastal marine area as a Controlled Activity. This is consistent with Policy 6 [Regionally important infrastructure] of the Plan but is still subject to the appropriate management of adverse effects.</p> <p>Through the consenting process, relevant environmental effects on historic heritage, indigenous biodiversity and use and enjoyment of the coast will be appropriately managed. Other adverse effects within the coastal marine area, e.g. water quality are likely to be less than minor and temporary. Some certainty for allowing the placement of network utilities in the coastal marine area is considered appropriate, which would not be the case if the activity was made a Restricted Discretionary Activity (with the ability to decline a resource consent application). Of note, as part of this Coastal Plan review, this Council has adopted a precautionary approach whereby, if uncertain that effects can be adequately identified and addressed as a Permitted Activity or Controlled Activity, it has determined that the effects will be considered as a full Discretionary Activity to ensure issues are fully and comprehensively canvassed.</p> <p>The Council has not encountered significant issues with the placement of utility structures in the coastal marine area under the current Plan and therefore do not consider it appropriate or necessary to require the placement of network utility structures to be made a Restricted Discretionary Activity.</p>
45 – Powerco	840	<p>Amend</p> <p>Submitter seeks new or amended rule to provide a permitted activity pathway for new network utility structures attached to existing road bridges in the coastal marine area.</p>	<p>No relief necessary</p> <p>Officers believe this relief has already been provided for in Rule 22 whereby network utility structure erection or placement includes pipelines and communication or electricity cables attached to a bridge and is a Permitted Activity (subject to meeting the standards, terms and conditions). If the activity does not</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
			meet the standards, terms and conditions in this Rule the activity would be addressed under Rule 33 or Rule 34 depending on the coastal management area involved.
Rule 23 –Port launching, mooring or berthing			
40 – Te Rūnanga o Ngāti Mutunga	841	<p>Amend</p> <p>Submitter seeks amendment to Rule 23 of the Plan to make the erection and placement of launching, mooring or berthing structures in the Port a Discretionary Activity (rather than a Controlled Activity).</p>	<p>Decline</p> <p>Officers recommend declining the relief sought by the submitter.</p> <p>Officers note that Rule 23 seeks to provide for the erection and placement of launching, mooring or berthing structures in the Port as a Controlled Activity. This is consistent with Policy 6 [Regionally important infrastructure] of the Plan, but is still subject to the appropriate management of adverse effects.</p> <p>Officers note that the Port is already a highly modified environment that provides a national and regionally important function whereby the movement of goods is dependent upon the erection and placement of launching, mooring and berthing structures. This is subject to complying with the standards, terms and conditions addressing the avoidance, remedying or mitigating of adverse effects (of which those relating to historic heritage and indigenous biodiversity are particularly pertinent). The Council sees no net environmental benefit to reducing business certainty in the Port by making the activity a Discretionary Activity.</p>
43 – Royal Forest and Bird Protection Society	842	<p>Amend</p> <p>Submitter seeks amendment to Rule 23 of the Plan to make the erection and placement of launching, mooring or berthing structures in the Port a Restricted Discretionary Activity (rather than a Controlled Activity).</p>	<p>Decline</p> <p>Officers recommend declining the relief sought by the submitter.</p> <p>Officers note that Rule 23 seeks to provide for the erection and placement of launching, mooring or berthing structures in the Port as a Controlled Activity. This is consistent with Policy 6 [Regionally important infrastructure] of the Plan, but is still subject to the appropriate management of adverse effects.</p> <p>Officers note that the Port is already a highly modified environment that provides a national and regionally important function whereby the movement of goods is dependent upon the erection and placement of launching, mooring and berthing structures. This is subject to complying with the standards, terms and conditions addressing the avoidance, remedying or mitigating of adverse effects (of which those relating to historic heritage and indigenous biodiversity are particularly pertinent). The Council sees no net environmental benefit to reducing business certainty in the Port by making the activity a Restricted Discretionary Activity.</p>
Further submissions – Port Taranaki Ltd (32)		<p>Oppose</p>	<p>Officers note that the Port is already a highly modified environment that provides a national and regionally important function whereby the movement of goods is dependent upon the erection and placement of launching, mooring and berthing structures. This is subject to complying with the standards, terms and conditions addressing the avoidance, remedying or mitigating of adverse effects (of which those relating to historic heritage and indigenous biodiversity are particularly pertinent). The Council sees no net environmental benefit to reducing business certainty in the Port by making the activity a Restricted Discretionary Activity.</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
58 – Te Atiawa	843	Amend	Decline
		Submitter seeks amendment to Rule 23 of the Plan to change the Activity Classification to Discretionary Activity (rather than a Controlled activity).	<p>Officers recommend declining the relief sought by the submitter.</p> <p>Officers note that Rule 23 seeks to provide for the erection and placement of launching, mooring or berthing structures in the Port as a Controlled Activity. This is consistent with Policy 6 [Regionally important infrastructure] of the Plan, but is still subject to the appropriate management of adverse effects.</p> <p>Officers note that the Port is already a highly modified environment that provides a national and regionally important function whereby the movement of goods is dependent upon the erection and placement of launching, mooring and berthing structures. This is subject to complying with the standards, terms and conditions addressing the avoidance, remedying or mitigating of adverse effects (of which those relating to historic heritage and indigenous biodiversity are particularly pertinent). The Council sees no net environmental benefit to reducing business certainty in the Port by making the activity a Discretionary Activity.</p>
Rule 24 – Whitebait stands			
21 – Climate Justice Taranaki	844	Support	Accept
		Retain the Prohibited Activity status for whitebait stands in the coastal marine area.	Support noted.
29 – Department of Conservation	845	Support	Accept
		Retain the Prohibited Activity status for whitebait stands in the coastal marine area.	Support noted.
40 – Te Rūnanga o Ngāti Mutunga	846	Support	Accept
		Retain the Prohibited Activity status for whitebait stands in the coastal marine area.	Support noted.
41 – Te Korowai o Ngāruahine Trust	847	Amend	Decline
		Submitter seeks amendment to Rule 24 of the Plan to make whitebait stands in the coastal marine area a Discretionary or Non-complying Activity (rather than a Prohibited Activity).	<p>The Rule does not exclude run-of-the-river whitebaiting, which is a popular recreational activity at many river mouths across Taranaki. However, the Rule does prohibit the establishment of whitebait structures that may contribute to over harvesting and exploitation of inanga species.</p> <p>Officers note that this Rule is an existing rule in the current Plan. It is a unique regional position adopted by this Council with strong community support to better protect whitebait stocks in this region. This is considered appropriate given the ongoing decline in the abundance of whitebait species in the region due to over</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
			harvesting (other necessary interventions relating to the loss of fish habitat are addressed in the Freshwater Plan).
43 – Royal Forest and Bird Protection Society	848	Support	Accept
		Retain the Prohibited Activity status for whitebait stands in the coastal marine area.	Support noted.
58 – Te Atiawa	849	Support	Accept
		Retain Rule 24 of the Plan as notified.	Support noted.
Rule 25 – Hard protection structure erection or placement			
32 – Port Taranaki	850	Amend	Decline
		Submitter seeks amendment to Rule 25 of the Plan to provide for hard protection structures within the Port coastal management area as a Controlled Activity (rather than a Discretionary Activity).	Officers recommend declining the relief sought by the submitter. Officers note that this Rule is an existing rule in the current Plan. Further, in accordance with the <i>New Zealand Coastal Policy Statement</i> and the policies of this Plan (particularly Policy 34), there is an expectation that hard protection structures will be discouraged and the use of alternatives promoted. This expectation is unlikely to be realised as a Controlled Activity.
43 – Royal Forest and Bird Protection Society	851	Amend	Decline
		Submitter seeks amendment to Rule 25 of the Plan by clarifying the purposes to which erosion control applies.	Officers do not believe this level of specificity needs to be provided in the rule. Such matters are more appropriately addressed through the consenting process, whereby the type of activity, its scale, purpose and effects can be considered on a case-by-case basis noting hard protection structures are a Discretionary Activity.
Further submissions – Te Rūnanga o Ngāti Mutunga (40), Te Atiawa (58)		Support	Officers further note that the General Policies 1 to 21, 22, 31, 32, 33, 34, 35, 39, 40, 41, 42, 44, 45, 46, and 49 from broad and comprehensive guidance and direction on the erection and placements of hard protection structures.
43 – Royal Forest and Bird Protection Society	852	Amend	Decline
		Submitter seeks amendment to Rule 25 of the Plan by deleting Outstanding Value, Estuaries Unmodified, Estuaries Modified coastal management areas from the rule (and provide a new non-complying rule for the erection or placement of hard protection structures in such areas).	Officers note there are significant urban areas that would be affected by the relief sought by the submitter such as New Plymouth, Waitara, Urenui and Patea. Many coastal settlements rely on hard protection structures to protect them from natural hazard processes Officers note that this Rule is an existing rule in the current Plan. Officers further note that in accordance with the <i>New Zealand Coastal Policy Statement</i> and the

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
			policies of this Plan (particularly Policy 34), there is an expectation that hard protection structures will be discouraged and the use of alternatives promoted. This expectation can be met as a Discretionary Activity.
59 KiwiRail	853	Support Retain Rule 25 of the Plan as notified.	Accept Support noted.
Further submissions – Fonterra (47)		Support	
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Oppose	
61 – Te Rūnanga o Ngāti Ruanui Trust	854	Amend Submitter seeks amendment to Rule 25 of the Plan to include standards, terms and 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) discharge complies with tangata whenua indicators referred to in the tangata whenua monitoring plan</i> <i>(c) 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>	Decline The submitter has sought the inclusion of standards, terms and conditions for rules in the Plan relating to discretionary and non-complying activities. Officers decline the relief noting that it is not standard planning practice for Discretionary Activity or Non-complying rules to include standards, terms and conditions. Conditions relating to a Non-complying Activity are developed on a case-by-case basis through the consenting process having regard to the relevant Plan policies. Officers note that all matters identified by the submitter would be considered through the consenting process with Policies 1 to 21, 22, 31, 32, 33, 34, 35, 39, 40, 41, 42, 44, 45, 46, and 49 being given effect to. In relation to notification requirements proposed by the submitter, officers note that the Plan is not intended to provide the operational detail for implementing every aspect of the Plan. Such detail is more appropriately included in the Council's standard operating procedures and/or any Mana Whakahono a Rohe agreements.
Further submissions – Te Rūnanga o Ngāti Mutunga (40), Te Korowai o Ngāruahine Trust (41), Te Atiawa (58)		Support	
Rule 26 – Exploration or appraisal of well drilling in the Open Coast or Port			
15 – Surfbreak Protection Society	855	Other Submitter seeks 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	No relief necessary

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		disturbance consent applications with the potential to impact on surf breaks or coastal water.	Submitter's comments are noted and have been previously addressed in submission point 443 relating to surfing policies. Policy 19 would be considered as part of any resource consent application under this Rule. Officers note that matters relating to affected and interested party status and limited notification are addressed separately in accordance with the Council's consenting standard operating procedures.
Further submissions – Petroleum Exploration and Production Association of New Zealand (37)		Oppose	
25 - New Zealand Petroleum and Minerals	856	Support	Accept
		Retain Rule 26 of the Plan as notified.	Support noted.
Further submissions – Trans-Tasman Resources (6), Port Taranaki Ltd (32), Petroleum Exploration and Production Association of New Zealand (37)		Support	
Further submissions – Climate Justice Taranaki Inc (21)		Oppose	
37 – Petroleum Exploration and Production Association of NZ	857	Amend	Accept
		Submitter supports Rule 26 of the Plan but seeks amendment to the Activity Description (b) in Rule 26 to align with Rule 27 to read: <i>Exploration or appraisal well drilling by an offshore installation or drilling by a land based drilling rig, and [placement of a well structure in, on, under or over the foreshore or seabed and any associated:</i> [...] <i>(b) temporary exclusive occupation of space in the common marine and coastal area [...]</i>	Officers recommend granting the relief sought by the submitter.
Further submissions ²¹ – Climate Justice Taranaki Inc (21), Taranaki Energy Watch (51)		Oppose	
37 – Petroleum Exploration and	858	Amend	Decline
		Submitter supports Rule 26 but seeks amendment to standard, term and condition (a) to read:	Officers recommend declining the relief sought by the submitter as being too uncertain.

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Production Association of NZ		<i>(a) drilling is not undertaken within 2,000 m of any site where drilling has occurred in the previous five years unless the Applicant can show to the satisfaction of Council that drilling within these parameters would avoid any potential cumulative effects [...]</i>	
40 – Te Rūnanga o Ngāti Mutunga	859	<p>Amend</p> <p>Submitter seeks amendment to Rule 26 of the Plan to make exploration or appraisal of well drilling a Discretionary Activity (rather than Controlled Activity)</p> <p>AND</p> <p>Amend Conditions (c) and (e) to read:</p> <p><i>(c) Drilling is not undertaken <u>within in the airspace above any site and to the centre of the earth below</u> any site identified in Schedule 5</i></p> <p><i>[...]</i></p> <p><i>(e) Drilling is undertaken at least 2,000 m <u>6,000 m</u> from the line of mean high water springs [...]</i></p>	<p>Decline</p> <p>Officers note that the seabed drilling in the Open Coast and Port is a Permitted Activity under the current Plan but is proposed to be a Controlled Activity for which a resource consent is required. It is important to differentiate between hydrocarbon <u>exploration</u> activities and later <u>production</u> activities as they are totally different activities with totally different associated environmental effects, i.e. due to the increased scale of activities and therefore effects associated with the construction and operation of an offshore petroleum production installation.</p> <p>The drilling associated with seabed exploration is not considered to have more than minor adverse effects, subject to compliance with standards, terms and conditions set out in Rule 26. Through the consenting process, relevant environmental effects will be appropriately managed and, in part reflecting a precautionary approach, specific conditions apply whereby the activity must be 2000 m or more from the line of the mean high water springs or from any Outstanding Value coastal management area, 1000m or more from any sensitive marine benthic habitats, including reef systems, and 2,000m from any other drilling site.</p> <p>The development of the rules regime and proposed standards, terms and conditions were informed by the report <i>Offshore Petroleum Drilling Review</i> (August 2015). Some certainty for these uses is considered appropriate, which would not be the case if the activity was made a Discretionary Activity (with the ability to decline a resource consent application).</p> <p>In relation to the amendments to the Conditions, those relating to (c) are considered unnecessary. Officers also do not recommend extending the buffer distance from 2,000m to 6,000m from the line of the mean high water springs. The submitter has not provided any additional information as to why the additional buffer area is required. However, officers note that Condition (b), (c) and (d) include additional locational constraints that should address any areas of concern.</p>
Further submissions – Petroleum Exploration and Production Association of New Zealand (37)		Oppose	
	860	Amend	Accept in part

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
41 – Te Korowai o Ngāruahine Trust		<p>Submitter seeks amendment to Rule 26 of the Plan to make exploration or appraisal of well drilling a Discretionary Activity (rather than Controlled Activity)</p> <p>AND</p> <p>Amend Condition (c) to read:</p> <p><i>(c) Drilling is not drilling is not undertaken within any site identified in Schedule 5A and B Historic heritage; [...].</i></p>	<p>Officers note that the seabed drilling in the Open Coast and Port is a Permitted Activity under the current Plan but is proposed to be a Controlled Activity for which a resource consent is required. It is important to differentiate between hydrocarbon <u>exploration</u> activities and later <u>production</u> activities as they are totally different activities with totally different associated environmental effects, i.e. due to the increased scale of activities and therefore effects associated with the construction and operation of an offshore petroleum production installation.</p> <p>The drilling associated with seabed exploration is not considered to have more than minor adverse effects, subject to compliance with standards, terms and conditions set out in Rule 26. Through the consenting process, relevant environmental effects will be appropriately managed and, in part reflecting a precautionary approach, specific conditions apply whereby the activity must be 2000 m or more from the line of the mean high water springs or from any Outstanding Value coastal management area, 1000m or more from any sensitive marine benthic habitats, including reef systems, and 2,000m from any other drilling site.</p> <p>The development of the rules regime and proposed standards, terms and conditions were informed by the report <i>Offshore Petroleum Drilling Review</i> (August 2015). Some certainty for these uses is considered appropriate, which would not be the case if the activity was made a Discretionary Activity (with the ability to decline a resource consent application).</p> <p>In relation to the amendment sought to Condition (c), officers agree to the relief sought.</p>
42 – Ngati Hine Hapu of Te Atiawa	861	<p>Amend</p> <p>Submitter seeks amendment to the conditions of Rule 26(c) to read:</p> <p><i>(c) drilling is undertaken within, <u>over, or under,</u> any site identified in Schedule 5 Historic heritage; [...]</i></p> <p>AND</p> <p>That there be iwi/hapū consultation in all cases.</p>	<p>No relief necessary</p> <p>Officers recommend declining the relief sought noting that the relief would restrict the consideration of more environmentally acceptable options to avoid or mitigate impacts on historic heritage values such as directional drilling under sites of significance.</p> <p>Officers further note that, as part of this Coastal Plan review process, and in relation to 'sites of significance' to Māori, Council has already agreed to recognise iwi as an affected party for all resource consent applications. There will be further opportunity to set consultation requirements and expectations as part of the development of Mana Whakahono a Rohe agreements.</p>
	862	<p>Amend</p>	<p>Decline</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
43 – Royal Forest and Bird Protection Society		Submitter seeks amendment to Rule 26 of the Plan by amending the Activity classification to make exploration or appraisal of well drilling a Restricted Discretionary Activity (rather than Controlled Activity).	<p>Officers note that the seabed drilling in the Open Coast and Port is a Permitted Activity under the current Plan but is proposed to be a Controlled Activity for which a resource consent is required. It is important to differentiate between hydrocarbon <u>exploration</u> activities and later <u>production</u> activities as they are totally different activities with totally different associated environmental effects, i.e. due to the increased scale of activities and therefore effects associated with the construction and operation of an offshore petroleum production installation.</p> <p>The drilling associated with seabed exploration is not considered to have more than minor adverse effects, subject to compliance with standards, terms and conditions set out in Rule 26. Through the consenting process, relevant environmental effects will be appropriately managed and, in part reflecting a precautionary approach, specific conditions apply whereby the activity must be 2000 m or more from the line of the mean high water springs or from any Outstanding Value coastal management area, 1000m or more from any sensitive marine benthic habitats, including reef systems, and 2,000m from any other drilling site.</p> <p>The development of the rules regime and proposed standards, terms and conditions were informed by the report <i>Offshore Petroleum Drilling Review</i> (August 2015). Some certainty for drilling activities is considered appropriate, which would not be the case if the activity was made a Restricted Discretionary Activity.</p>
Further submissions – Department of Conservation (29), Te Korowai o Ngāruahine Trust (41)		Support	
Further submissions – Petroleum Exploration and Production Association of New Zealand (37)		Oppose	
43 – Royal Forest and Bird Protection Society	863	<p>Amend</p> <p>Submitter seeks amendment to Rule 26 of the Plan by adding matter of discretions to consider effects on indigenous biodiversity and natural character.</p>	<p>Accept</p> <p>Officers agree to the relief sought by the submitter by amending the following matters of discretion in Rule 26 (plus consequential changes to equivalent rules elsewhere in the Plan) to read:</p> <p><i>(f) effects on ecological natural character, features and landscapes values</i> <i>(fa) effects on indigenous biodiversity values</i></p> <p>Of note, the suggested amendments to replace term “ecological” better aligns with the wording adopted in the General Policies and references to natural character, features and landscapes and indigenous biodiversity.</p>
Further submissions – Department of Conservation (29), Te Korowai o Ngāruahine Trust (41)		Support	
Further submissions – Petroleum Exploration and Production Association of New Zealand (37)		Oppose	
	864	Amend	Decline

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
43 – Royal Forest and Bird Protection Society		Submitter seeks amendment to Rule 26 of the Plan by identifying areas of significant biodiversity and excluding these from this rule.	<p>Officers recommend declining the relief sought by the submitter.</p> <p>Officers note that Rule 26 already excludes drilling areas from Outstanding Value, Estuary Unmodified and Estuary Modified coastal management areas. Furthermore Conditions (b) and (d) also apply that require the consideration of indigenous biodiversity matters. Officers do not consider it appropriate or necessary to exclude drilling activities from other parts of the Open Coast or the Port regardless of whether the activity is having adverse effects or not.</p> <p>Officers believe it is important to differentiate between hydrocarbon <u>exploration</u> activities and later <u>production</u> activities as they are totally different activities with totally different associated environmental effects, i.e. due to the increased scale of activities and therefore effects associated with the construction and operation of an offshore petroleum production installation.</p> <p>The drilling associated with seabed exploration is not considered to have more than minor adverse effects, subject to compliance with standards, terms and conditions set out in Rule 26. Through the consenting process, relevant environmental effects will be appropriately managed and, in part reflecting a precautionary approach, specific conditions apply whereby the activity must be 2000 m or more from the line of the mean high water springs or from any Outstanding Value coastal management area, 1000m or more from any sensitive marine benthic habitats, including reef systems, and 2,000m from any other drilling site.</p>
Further submissions – Department of Conservation (29)		Support	
Further submissions – Petroleum Exploration and Production Association of New Zealand (37)		Oppose	
43 – Royal Forest and Bird Protection Society	865	<p>Amend</p> <p>Submitter seeks amendment to Rule 26 of the Plan by adding a requirement to publicly notify under this rule.</p>	<p>Decline</p> <p>Officers do not consider it appropriate to include this level of operational detail in the Plan but note that in accordance with its standard operating procedures, activities that are identified as a Controlled activity are generally not publicly notified.</p>
Further submissions – Petroleum Exploration and Production Association of New Zealand (37)		Oppose	
51 - Taranaki Energy Watch	866	<p>Amend</p> <p>Submitter seeks amendment to Rule 26 of the Plan by amending the Activity Classification to make exploration or appraisal of well drilling so that it is a :</p> <ul style="list-style-type: none"> discretionary activity (rather than Controlled Activity) non-complying activity in open coast, estuaries modified and port areas 	<p>Decline</p> <p>Officers recommend declining the relief sought by the submitter (although noting that some matters are already addressed in the Plan).</p> <p>Officers believe it is important to differentiate between hydrocarbon <u>exploration</u> activities and later <u>production</u> activities as they are totally different activities with totally different associated environmental effects, i.e. due to the increased scale of</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		<ul style="list-style-type: none"> prohibited activity in the coastal managements areas of outstanding value and estuaries unmodified 	<p>activities and therefore effects associated with the construction and operation of an offshore petroleum production installation.</p> <p>The drilling associated with seabed exploration is not considered to have more than minor adverse effects, subject to compliance with standards, terms and conditions set out in Rule 26. Through the consenting process, relevant environmental effects will be appropriately managed and, in part reflecting a precautionary approach, specific conditions apply.</p> <p>Drilling activities in the Open Coast or Port that cannot comply with the standards, terms and conditions of Rule 26 are a Discretionary Activity (under Rule 27). It is also noted that drilling in Estuaries Modified is already addressed in the Plan as a Non-complying Activity (under Rule 28).</p> <p>Officers emphasize that Rule 26 already excludes drilling areas from the Outstanding Value, Estuary Unmodified and Estuary Modified coastal management areas. Non-complying Activities require a resource consent and Council cannot grant the consent unless the effects of the activity are minor and the activity is not contrary to the objectives and policies of the Plan. This already represents a high level of protection.</p>
Further submissions – Petroleum Exploration and Production Association of New Zealand (37)		Oppose	
51 - Taranaki Energy Watch	867	<p>Amend</p> <p>Submitter seeks amendment to Rule 26 of the Plan to identify 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</p>	<p>Decline</p> <p>Officers recommend declining the relief sought by the submitter. Officers do not believe it is necessary to set a ‘limit’ on how many wells can be drilled in an area as the appropriate number depends upon the size of the exploration area being surveyed. Officers note that the rule already contains standards, terms and conditions relating to buffer distances from other well sites and that matters of control address such as location.</p>
Further submissions – Petroleum Exploration and Production Association of New Zealand (37)		Oppose	
53 - Taranaki Regional Council	868	<p>Amend</p> <p>Submitter seeks amendment to Activity Description (b) of Rule 26 of the Plan to read: (b) <u>temporary exclusive</u> occupation of space in the common marine and coastal area; [...]</p>	<p>Accept</p> <p>Officers recommend granting the relief sought by the submitter to clarify that occupation of space in the common marine and coastal area is not permanent.</p>
58 – Te Atiawa	869	<p>Amend</p>	<p>Decline</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		Submitter seeks amendment to Rule 26 of the Plan to change the Activity Classification to Discretionary Activity (rather than Controlled Activity).	Officers note that the seabed drilling in the Open Coast and Port is a Permitted Activity under the current Plan but is proposed to be a Controlled Activity for which a resource consent is required. It is important to differentiate between hydrocarbon exploration activities and later production activities as they are totally different activities with totally different associated environmental effects, i.e. due to the increased scale of activities and therefore effects associated with the construction and operation of an offshore petroleum production installation.
Further submissions – Petroleum Exploration and Production Association of New Zealand (37)		Oppose	The drilling associated with seabed exploration is not considered to have more than minor adverse effects, subject to compliance with standards, terms and conditions set out in Rule 26. Through the consenting process, relevant environmental effects will be appropriately managed and, in part reflecting a precautionary approach, specific conditions apply whereby the activity must be 2000m or more from the line of the mean high water springs or from any Outstanding Value coastal management area, 1000m or more from any sensitive marine benthic habitats, including reef systems, and 2,000m from any other drilling site.
Further submissions 55 – Kiwis Against Seabed Mining (55)		Support	The development of the rules regime and proposed standards, terms and conditions were informed by the report <i>Offshore Petroleum Drilling Review</i> (August 2015). Some certainty for drilling activities is considered appropriate, which would not be the case if the activity was made a Discretionary Activity.
58 – Te Atiawa	870	Amend Submitter seeks amendment to Rule 26 of the Plan to change the reference to Schedule 5 in the Conditions to Schedules 5A and 5B.	Accept Officers recommend granting the relief sought by the submitter.
58 – Te Atiawa	871	Amend Submitter seeks amendment to Conditions (c) and (e) of Rule 26 of the Plan to read as follows: (c) drilling is not undertaken <i>in the airspace above and in the ground below to the earth's core within any site identified in Schedule 5 [Historic heritage]; and [...]</i> (e) drilling is undertaken at least 2,000m <u>6,000m</u> from the line of mean high water springs [...]	Decline Officers note that the seabed drilling in the Open Coast and Port is a Permitted Activity under the current Plan but is proposed to be a Controlled Activity for which a resource consent is required. It is important to differentiate between hydrocarbon <u>exploration</u> activities and later <u>production</u> activities as they are totally different activities with totally different associated environmental effects, i.e. due to the increased scale of activities and therefore effects associated with the construction and operation of an offshore petroleum production installation.
Further submissions – Petroleum Exploration and Production Association of New Zealand (37)		Oppose	The drilling associated with seabed exploration is not considered to have more than minor adverse effects, subject to compliance with standards, terms and conditions set out in Rule 26. Through the consenting process, relevant

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
			<p>environmental effects will be appropriately managed and, in part reflecting a precautionary approach, specific conditions apply whereby the activity must be 2000m or more from the line of the mean high water springs or from any Outstanding Value coastal management area, 1000m or more from any sensitive marine benthic habitats, including reef systems, and 2,000m from any other drilling site.</p> <p>The development of the rules regime and proposed standards, terms and conditions were informed by the report <i>Offshore Petroleum Drilling Review</i> (August 2015). Some certainty for these uses is considered appropriate, which would not be the case if the activity was made a Discretionary Activity (with the ability to decline a resource consent application).</p> <p>In relation to the amendments to the Conditions, those relating to (c) are considered unnecessary. Officers also do not recommend extending the buffer distance from 2,000m to 6,000m from the line of the mean high water springs. The submitter has not provided any additional information as to why the additional buffer area is required. However, Officers note that Condition (b), (c) and (d) include additional locational constraints that should address any areas of concern.</p>
60 – Te Kaahui o Rauru	872	<p>Amend</p> <p>Submitter seeks amendment to the Activity Classification of Rule 26 of the Plan by removing the Controlled Activity classification.</p>	<p>Decline</p> <p>Officers note that the seabed drilling in the Open Coast and Port is a Permitted Activity under the current Plan but is proposed to be a Controlled Activity for which a resource consent is required. It is important to differentiate between hydrocarbon <u>exploration</u> activities and later <u>production</u> activities as they are totally different activities with totally different associated environmental effects, i.e. due to the increased scale of activities and therefore effects associated with the construction and operation of an offshore petroleum production installation.</p>
Further submissions – Petroleum Exploration and Production Association of New Zealand (37)		<p>Oppose</p>	<p>The drilling associated with seabed exploration is not considered to have more than minor adverse effects, subject to compliance with standards, terms and conditions set out in Rule 26. Through the consenting process, relevant environmental effects will be appropriately managed and, in part reflecting a precautionary approach, specific conditions apply whereby the activity must be 2000 m or more from the line of the mean high water springs or from any Outstanding Value coastal management area, 1000m or more from any sensitive marine benthic habitats, including reef systems, and 2,000m from any other drilling site.</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
			The development of the rules regime and proposed standards, terms and conditions were informed by the report <i>Offshore Petroleum Drilling Review</i> (August 2015). Some certainty for drilling activities is considered appropriate, which would not be the case if the activity was made a Restricted Discretionary, Discretionary or Non-complying Activity.
61 – Te Rūnanga o Ngāti Ruanui Trust	873	Amend Submitter seeks amendment to Rule 26 of the Plan by amending the Activity Classification to make exploration or appraisal of well drilling a Discretionary Activity (rather than Controlled Activity)	Decline Officers note that the seabed drilling in the Open Coast and Port is a Permitted Activity under the current Plan but is proposed to be a Controlled Activity for which a resource consent is required. It is important to differentiate between hydrocarbon <u>exploration</u> activities and later <u>production</u> activities as they are totally different activities with totally different associated environmental effects, i.e. due to the increased scale of activities and therefore effects associated with the construction and operation of an offshore petroleum production installation.
Further submissions – Petroleum Exploration and Production Association of New Zealand (37)		Oppose	
Further submissions – Kiwis Against Seabed Mining (55)		Support	The drilling associated with seabed exploration is not considered to have more than minor adverse effects, subject to compliance with standards, terms and conditions set out in Rule 26. Through the consenting process, relevant environmental effects will be appropriately managed and, in part reflecting a precautionary approach, specific conditions apply whereby the activity must be 2000 m or more from the line of the mean high water springs or from any Outstanding Value coastal management area, 1000m or more from any sensitive marine benthic habitats, including reef systems, and 2,000m from any other drilling site. The development of the rules regime and proposed standards, terms and conditions were informed by the report <i>Offshore Petroleum Drilling Review</i> (August 2015). Some certainty for drilling activities is considered appropriate, which would not be the case if the activity was made a Discretionary Activity.
61 – Te Rūnanga o Ngāti Ruanui Trust	874	Amend Submitter seeks amendment to the standards, terms and conditions of Rule 26 of the Plan to read: <i>(a) drilling is not undertaken within 2,000 m of any site where drilling has occurred in the previous five years; placement of structure and discharge does not adversely affect the matters/values identified for protection by mana whenua in the cultural impact assessment;</i>	Decline The submitter has sought the inclusion of new and amended standards, terms, conditions for Rule 26. Officers decline the relief noting that all matters identified by the submitter would be considered through the consenting process with Policies 1 to 21, 22, 28, 29, 30, 31, 32, 36, 37, 38, 39, 40, 41, 42, 44, 47 and 49 being given effect to. Of note the

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		<p>(b) drilling is not undertaken directly into or within 1000 m of any sensitive marine benthic habitat identified in Schedule 4B or reef system; discharge complies with tangata whenua indicators referred to in the tangata whenua monitoring plan;</p> <p>(c) drilling is not undertaken within any site identified in Schedule 5 [Historic heritage]; discharge is consistent with iwi management 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>	<p>matters of control in the Rule make provision to address many of the matters sought by the submitter such as cultural heritage and monitoring.</p> <p>Officers are further opposed to deleting those conditions addressing the type of drill muds and fluids used, general height, lighting and noise standards, and effects on natural character, indigenous biodiversity, historic heritage (including sites of significance to Māori) and amenity values, including cumulative effects of multiple drilling sites in a single locality. The development of the rules regime and proposed standards, terms and conditions were informed by the report <i>Offshore Petroleum Drilling Review</i> (August 2015).</p> <p>Through the consenting process, relevant environmental effects associated with drilling will be appropriately managed by compliance with standards, terms and conditions set out in Rule 26. A number of conditions that the submitter seeks to have deleted reflect a precautionary approach. Granting the relief would derogate from that approach, particularly those conditions requiring the activity to be 2000 m or more from the line of the mean high water springs or from any Outstanding Value coastal management area, 1000m or more from any sensitive marine benthic habitats, including reef systems, and 2,000m from any other drilling site.</p>
Further submissions – Petroleum Exploration and Production Association of New Zealand (37)		Oppose	
Further submissions – Te Atiawa (58)		Support	
61 – Te Rūnanga o Ngāti Ruanui Trust	875	<p>Amend</p> <p>Submitter seeks amendment to Rule 26 of the Plan by deleting matters included in the Control/Notification column of the Rule and including the following notification note:</p> <p><u>Resource consent applications under this Rule will be notified to tangata whenua.</u></p>	<p>Decline</p> <p>Officers note that the Plan is not intended to provide the operational detail for implementing every aspect of the Plan. Such detail is more appropriately included in the Council's standard operating procedures and/or any Mana Whakahono a Rohe agreements.</p>
NEW Rule 26A – Disturbance of seabed by mining			
	876	Amend	Decline

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
6 – Trans-Tasman Resources Ltd		<p>Submitter seeks amendment to the Plan by including a new Rule 26A to explicitly address disturbance of the seabed by drilling, which would read as follows:</p> <p><u><i>26A Disturbance of seabed by drilling</i></u></p> <p><u>Classification: Permitted activity</u></p> <p><u>Coastal management areas: Estuaries Unmodified, Estuaries Modified, Open Coast, Port</u></p> <p><u>Standards, terms and conditions</u></p> <p><u><i>(a) Drilling is confined to mud, silt, sand, gravel and other fine sediments;</i></u></p> <p><u><i>(b) drilling does not occur within the Schedule 2 locations or within 200m of the Schedule 2 locations;</i></u></p> <p><u><i>(c) spacing between drilling locations (other than a re-drill or twinning of a hole) is not less than 0.5 km;</i></u></p> <p><u><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></u></p> <p><u><i>(e) the volume of material removed from a drilling location does not exceed 0.3 m³;</i></u></p> <p><u><i>(f) the area of seabed disturbed at a drilling location does not exceed 3 m²;</i></u></p> <p><u><i>(g) drilling does not have an adverse effect on the values associated with historic heritage identified in Schedule 5 [Historic heritage];</i></u></p> <p><u><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></u></p> <p><u><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></u></p>	<p>Officers do not believe this rule is necessary and suggest that Rule 26 already addresses the activity. Nor do officers consider it appropriate that drilling for seabed mining be a Permitted Activity.</p>
Further submissions – Climate Justice Taranaki Inc (21), Te Rūnanga o Ngāti Mutunga (40), Te Korowai o Ngāruahine Trust (41), Royal Forest and Bird Protection Society (43), Te Atiawa (58), Te Rūnanga o Ngāti Ruanui Trust (61)		Oppose	

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Further submissions – Port Taranaki Ltd (32)		Oppose in part	
Further submissions – Petroleum Exploration and Production Association of New Zealand (37)		Neutral	
Rules 26, 27 and 28 – Exploration or appraisal of well drilling in the Open Coast or Port			
21 – Climate Justice Taranaki	877	<p>Amend</p> <p>Submitter seeks that drilling of any petroleum exploration or appraisal well and associated activities in the coastal marine area be a Prohibited Activity</p> <p>OR</p> <p>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)</p> <p>OR</p> <p>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.</p>	<p>Decline</p> <p>Officers recommend declining the relief sought by the submitter.</p> <p>Officers note that the seabed drilling in the Open Coast and Port is a Permitted Activity under the current Plan but is proposed to be a Controlled Activity for which a resource consent is required. It is important to differentiate between hydrocarbon <u>exploration</u> activities and later <u>production</u> activities as they are totally different activities with totally different associated environmental effects, i.e. due to the increased scale of activities and therefore effects associated with the construction and operation of an offshore petroleum production installation.</p> <p>The drilling associated with seabed exploration should not result in more than minor adverse effects, subject to compliance with standards, terms and conditions set out in Rule 26. It is therefore considered inappropriate to make this activity a Discretionary Activity yet alone a Prohibited Activity.</p> <p>The submitter states that if the Controlled Activity status is retained, then they seek extended set back distances (from 1000m to 6000m) to be made from sensitive marine benthic habitat, reef systems or the boundary of Outstanding Value coastal management areas. No information has been provided to demonstrate why the proposed buffer distances are more appropriate compared to those adopted in the Rule and which were based on Cawthron recommendations set out in their advice entitled <i>Petroleum Drilling Activities: Buffer Distances From Outstanding Areas and Substrate Types Requiring Protection</i>.</p>
Further submissions – Port Taranaki Ltd (32), Petroleum Exploration and Production Association of New Zealand (37)		Oppose	
Rules 26 to 30 – Exploration or appraisal well drilling			
51 - Taranaki Energy Watch	878	<p>Amend</p> <p>Submitter supports the bundling of consents in Rules 26 to 30 of the Plan and that activities that include an onshore and offshore component should be bundled</p>	<p>Decline</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		together, however, opposes the use of bundling to make all petroleum activities a Controlled Activity in the coastal marine area.	Officers note submitters support in relation to bundling the onshore and offshore components of drilling.
Further submissions – Port Taranaki Ltd (32), Petroleum Exploration and Production Association of New Zealand (37)		Oppose	In relation to the submitter's opposition to bundling all petroleum activities a Controlled Activity in the coastal marine area, Officers note that the rules differentiate between hydrocarbon <u>exploration</u> activities and later <u>production</u> activities. According not "all" petroleum related activities have been bundled in this Rule. Separate rules apply recognising the different phases of hydrocarbon exploration and production activities and associated environmental effects, i.e. due to the increased scale of activities and therefore effects associated with the construction and operation of an offshore petroleum production installation. In relation to drilling activities, the 'bundled' activities identified in the Activity Description are incidental activities that would typically occur in association with any drilling activity. Their effects are considered and addressed as part of the standards, terms and conditions set out in the Rule.
Further submissions – Te Korowai o Ngāruahine Trust (41)		Support	
51 - Taranaki Energy Watch	879	<p>Amend</p> <p>Submitter seeks amendment to Rules 26-30 of the Plan by:</p> <ul style="list-style-type: none"> • incorporating a precautionary approach in the rules • having regard to the <i>Marine Oil Spill Contingency Plan (MOSCP, 2012)</i>, in particular <i>Appendix 4. Sensitive Site Coastal Info</i> when considering the rules notification and activity status • applying an assessment criteria to discretionary oil and gas activities within the coastal marine area that includes consideration of low probability but significant adverse effects events and buffer zones as appropriate planning tools • add a requirement to publically notify under these rules. 	<p>Decline</p> <p>Officers suggest that Rules 26 to 30 of the Plan do incorporate a precautionary approach, whereby for drilling in the Open Coast or Port (for which the activity and adverse effects are relatively low, subject to compliance with standards, terms and conditions) conditions have been applied that includes buffer distances based on Cawthron advice requiring the activity to be 2000m or more from the line of the mean high water springs or from any Outstanding Value coastal management area, 1000m or more from any sensitive marine benthic habitats, including reef systems, and 2,000m from any other drilling site.</p> <p>Rules 27 to 30 relate to drilling activities not being able to comply with Rule 26 and/or later production activities (which involve an increased scale of activities and therefore effects associated with the construction and operation of an offshore petroleum production installation). These Rules require any drilling or later production activities to be considered as a Discretionary Activity or a Non-complying Activity depending upon coastal management area affected. Through the consenting process, relevant environmental effects will be appropriately considered and Policies 1 to 21, 22, 28, 29, 30, 31, 32, 36, 37, 38, 39, 40, 41, 42, 44, 47 and 49, including Policy 3 relating to the adoption of a precautionary approach.</p>
Further submissions – Climate Justice Taranaki Inc (21), Te Korowai o Ngāruahine Trust (41)		Support	
Further submissions – Petroleum Exploration and Production Association of New Zealand (37)		Oppose	

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Further submissions – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd (46)		Oppose/Oppose in part	<p>The development of the rules regime and proposed standards, terms and conditions were informed by the report <i>Offshore Petroleum Drilling Review</i> (August 2015). It included consideration of the <i>Marine Oil Spill Contingency Plan (2012)</i> when considering the rules notification and activity status. However, through the consenting process this and other relevant strategies, plans and reports will be further considered. Throughout this Plan review process the consideration of low probability but significant adverse effects events have been considered and work commissioned to investigate buffer zones as appropriate planning tools.</p> <p>In relation to public notification, officers note that such operational matters are not a contents requirement of a Plan and are addressed separately in accordance with the Council's consenting standard operating procedures.</p>
55 – Kiwis Against Seabed Mining	880	<p>Amend</p> <p>Submitter seeks amendment to the Plan so that Rules 26 to 30 are, at minimum, a Discretionary Activity classification and that areas with higher natural and cultural values are either Non-complying Activities or Prohibited Activity.</p>	<p>No relief necessary/Decline</p> <p>The submitter seeks that all drilling and production activities in the coastal marine area be a Discretionary Activity at the very least and Non-complying or Prohibited Activity within areas with higher natural and cultural values.</p>
Further submissions – Climate Justice Taranaki Inc (21), Te Korowai o Ngāruahine Trust (41)		Support	<p>Officers note that the Rules 27 to 30 already give effect to the relief sought by the submitter (but not in relation to Rule 26).</p> <p>For Rules 27 to 30, officers suggest no relief is necessary as drilling and production activities in the coastal marine area are already a Discretionary or Non-complying Activity depending upon what coastal management area the activity occurs in. As part of that framework, Outstanding Value. Estuaries Unmodified and Estuaries Modified coastal management areas have a higher level of regulatory protection under the Plan.</p>
Further submissions – Petroleum Exploration and Production Association of New Zealand (37), Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd (46)		Oppose	<p>However, drilling activities in the Open Coast or Port coastal management areas, are currently proposed to be a Controlled Activity (noting it is a Permitted Activity under the current Plan). This is considered appropriate as drilling associated with seabed exploration should have less than minor adverse effects, subject to compliance with standards, terms and conditions set out in Rule 26. It is important to differentiate between hydrocarbon <u>exploration</u> activities and later <u>production</u> activities as they are totally different activities with totally different associated environmental effects, i.e. due to the increased scale of activities and therefore effects associated with the construction and operation of an offshore petroleum production installation. Officers do not believe it appropriate to require this activity to be a Discretionary Activity.</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
56 – Greenpeace	881	Amend Submitter seeks amendment to the Plan so that Rules 26 to 30 are, at minimum, a Discretionary Activity classification.	Decline The submitter seeks that all drilling and production activities in the coastal marine area be a Discretionary Activity at the very least and Non-complying or Prohibited Activity within areas with higher natural and cultural values. Officers note that the Rules 27 to 30 already give effect to the relief sought by the submitter (but not in relation to Rule 26). For Rules 27 and 30, Officers suggest no relief is necessary as drilling and production activities in the coastal marine area are already a Discretionary or Non-complying Activity depending upon what coastal management area the activity occurs in. However, drilling activities in the Open Coast or Port coastal management areas, are currently proposed to be a Controlled Activity (it is a Permitted Activity under the current Plan). This is considered appropriate as drilling associated with seabed exploration should have less than minor adverse effects, subject to compliance with standards, terms and conditions set out in Rule 26. It is important to differentiate between hydrocarbon exploration activities and later production activities as they are totally different activities with totally different associated environmental effects, i.e. due to the increased scale of activities and therefore effects associated with the construction and operation of an offshore petroleum production installation. Officers do not believe it appropriate to require this activity to be a Discretionary Activity.
Further submissions – Climate Justice Taranaki Inc (21), Te Korowai o Ngāruahine Trust (41)		Support	
Further submissions – Petroleum Exploration and Production Association of New Zealand (37), Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd 46)		Oppose	
Rule 27 – Exploration or appraisal of well drilling in the Open Coast or Port			
25 – New Zealand Petroleum and Minerals	882	Support Retain Rule 27 of the Plan as notified OR Amend to Restricted Discretionary and include similar matters of discretion to the matters of control in Rule 26.	Accept Support for retaining Rule 27 noted.
Further submissions – Trans-Tasman Resources (6)		Support	
	883	Other	No relief necessary

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
42 – Ngati Hine Hapu of Te Atiawa		Submitter question why the standards, terms and conditions and the control and notification columns are left blank for this Discretionary Activity rule.	The submitter question why there are no standards/terms/conditions for rules in the Plan relating to discretionary and non-complying activities. Officers note that it is not standard planning practice for Discretionary Activity or Non-complying rules to include standards, terms and conditions. Conditions relating to a Non-complying Activity are developed on a case by case basis through the consenting process having regard to the relevant Plan policies.
43 – Royal Forest and Bird Protection Society	884	Amend	Decline
		Submitter suggests that the application of Rule 26 is uncertain as to what duration of occupation is considered temporary under Activity (b). Submitter seeks amendment to the Plan to include a policy or definition of temporary occupation.	Officers recommend not granting the relief sought noting that “ <i>temporary</i> ” requires some context and temporary occupation will depend upon a broad consideration of all relevant policies and would be best determined on a case-by-case basis through the consenting process.
Further submissions – Petroleum Exploration and Production Association of New Zealand (37)		Neutral	
Further submissions – Taranaki Energy Watch (51)		Support	
43 – Royal Forest and Bird Protection Society	885	Amend	Accept in part
		Submitter seeks other reliefs to the Plan that give effect to policies 11, 13, and 15 of the <i>New Zealand Coastal Policy Statement</i> and so that they provide direction for considering consent applications under this rule.	The submitter suggests that exploration and appraisal well drilling activities generates noise, vibration and disturbance that has adverse effects on marine mammals. The noise, vibration and disturbance can be as or more significant than for production wells. It is unclear how the Council will ensure that activities will not have adverse effects that extend into Outstanding Value, Estuaries Unmodified and Estuaries Modified management areas. Officers note that amendments have been made to relevant policies in the Plan that address, in part, some of the matters sought by the submitter.
58 – Te Atiawa	886	Amend	Decline
		Submitter seeks amendment to Rule 27 of the Plan to include two new standards, terms and conditions to read: <i>(a) drilling is not undertaken in the airspace above and in the ground below to the earth's core within any site identified in Schedule 5 [Historic heritage]; and</i> <i>(b) drilling is undertaken at least 6,000m from the line of mean high water springs.</i>	The submitter has sought the inclusion of standards/terms/conditions for a Discretionary Activity rule. Officers note that it is not standard planning practice for Discretionary Activity or Non-complying rules to include standards, terms and conditions. Conditions

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Further submissions – Te Korowai o Ngāruahine Trust (41)		Support	relating to a Non-complying Activity are developed on a case by case basis through the consenting process having regard to the relevant Plan policies.
61 – Te Rūnanga o Ngāti Ruanui Trust	887	<p>Amend</p> <p>Submitter seeks amendment to Rule 27 of the Plan to include standards, terms and conditions to read:</p> <p><i><u>(a) exploration or appraisal well drilling does not adversely affect the matters/values identified for protection by mana whenua in the cultural impact assessment;</u></i></p> <p><i><u>(b) exploration or appraisal well drilling complies with tangata whenua indicators referred to in the tangata whenua monitoring plan</u></i></p> <p><i><u>(c) exploration or appraisal well drilling is consistent with iwi management plan.</u></i></p> <p>AND</p> <p>Include the following notification note:</p> <p><i><u>Resource consent applications under this Rule will be notified to tangata whenua.</u></i></p>	<p>Decline</p> <p>The submitter has sought the inclusion of standards/terms/conditions for rules in the Plan relating to discretionary and non-complying activities.</p> <p>Officers decline the relief noting that it is not standard planning practice for Discretionary Activity or Non-complying rules to include standards, terms and conditions. Conditions relating to a Non-complying Activity are developed on a case by case basis through the consenting process having regard to the relevant Plan policies.</p> <p>Officers note that all matters identified by the submitter would be considered through the consenting process with Policies 1 to 21, 22, 28, 29, 30, 31, 32, 36, 37, 38, 39, 40, 41, 42, 44, 47 and 49 being given effect to.</p> <p>In relation to notification requirements proposed by the submitter, officers note that the Plan is not intended to provide the operational detail for implementing every aspect of the Plan. Such detail is more appropriately included in the Council's standard operating procedures and or Mana Whakahono a Rohe agreements.</p>
Further submissions – Petroleum Exploration and Production Association of New Zealand (37)		Oppose	
Further submissions – Te Rūnanga o Ngāti Mutunga (40), Te Korowai o Ngāruahine Trust (41), Te Atiawa (58)		Support	
Rule 28 – Exploration or appraisal of well drilling in coastal management areas: Outstanding Value, Estuaries Unmodified and Estuaries Modified			
25 – New Zealand Petroleum and Minerals	888	<p>Support</p> <p>Retain Rule 28 of the Plan as notified.</p>	<p>Accept</p> <p>Support noted.</p>
Further submissions – Trans-Tasman Resources (6)		Support	
40 – Te Rūnanga o Ngāti Mutunga	889	<p>Support</p> <p>Retain Rule 28 of the Plan as notified.</p>	<p>Accept</p> <p>Support noted.</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
43 – Royal Forest and Bird Protection Society	890	Amend	Decline
		Submitter seeks amendment to Rule 28 of the Plan 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).	Officers note that Non-complying Activity is already a very high level of regulatory protection whereby a resource consent cannot be granted unless the effects of the activity are minor and the activity is not contrary to the objectives and policies of the Plan. Of note, the policies themselves are very prescriptive.
Further submissions – Department of Conservation (29)		Support	Officers do not believe it is appropriate to preclude any consideration of any exploration activities being considered in these areas.
51 – Taranaki Energy Watch	891	Amend	Decline
		Submitter seeks amendment to the Rule 28 of the Plan 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).	Officers do not believe it is appropriate to preclude any consideration of any exploration or appraisal of well drilling in the Outstanding Value, Estuaries Unmodified and Estuaries Modified coastal management areas. Officers note that Non-complying Activity already provides a very high level of regulatory protection whereby a resource consent cannot be granted unless the effects of the activity are minor and the activity is not contrary to the objectives and policies of the Plan. Of note the policies themselves are very prescriptive.
58 – Te Atiawa	892	Support	Accept
		Retain Rule 28 of the Plan as notified.	Support noted.
61 – Te Rūnanga o Ngāti Ruanui Trust	893	Amend	Decline
		Submitter seeks amendment to Rule 28 of the Plan to include standards, terms and conditions to read: <i><u>(a) exploration or appraisal well drilling does not adversely affect the matters/values identified for protection by mana whenua in the cultural impact assessment;</u></i> <i><u>(b) exploration or appraisal well drilling complies with tangata whenua indicators referred to in the tangata whenua monitoring plan</u></i> <i><u>(c) exploration or appraisal well drilling is consistent with iwi management plan.</u></i> AND Include the following notification note: <i><u>Resource consent applications under this Rule will be notified to tangata whenua.</u></i>	The submitter has sought the inclusion of standards/terms/conditions for rules in the Plan relating to Discretionary and Non-complying Activities. Officers decline the relief noting that it is not standard planning practice for Discretionary Activity or Non-complying rules to include standards, terms and conditions. Conditions relating to a Non-complying Activity are developed on a case-by-case basis through the consenting process having regard to the relevant Plan policies. Officers note that all matters identified by the submitter would be considered through the consenting process with Policies 1 to 21, 22, 28, 29, 30, 31, 32, 36, 37, 38, 39, 40, 41, 42, 44, 47 and 49 being given effect to. In relation to notification requirements proposed by the submitter, officers note that the Plan is not intended to provide the operational detail for implementing every

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Further submissions – Te Rūnanga o Ngāti Mutunga (40), Te Korowai o Ngāruahine Trust (41), Te Atiawa (58)		Support	aspect of the Plan. Such detail is more appropriately included in the Council's standard operating procedures and/or any Mana Whakahono a Rohe agreements.
Rule 29 – Petroleum production installation erection or placement in coastal management areas: Port and Open Coast			
25 – New Zealand Petroleum and Minerals	894	Support Retain Rule 29 of the Plan as notified.	Accept Support noted.
Further submissions – Port Taranaki Ltd (32)		Support	
40 – Te Rūnanga o Ngāti Mutunga	895	Amend Submitter seeks amendment to Rule 29 of the Plan to include the addition of the conditions listed for Rule 26 with the alteration from 2,000m to 6,000m as outlined for that rule.	Decline The submitter has sought the inclusion of standards/terms/conditions for rules in the Plan relating to a Discretionary Activity. Officers recommend declining the relief noting that it is not standard planning practice for Discretionary Activity or Non-complying Activity rules to include standards, terms and conditions.
Further submissions – Department of Conservation (29)		Support	Officers note that the rules differentiate between hydrocarbon exploration activities and later production activities. Due to the increased scale of effects associated with the construction and operation of an offshore petroleum production installation it maybe that a buffer distance of 6,000m from the line of the mean high water springs is appropriate. However, Officers still believe it is appropriate that locational and other considerations be addressed on a case-by-case basis (noting that Council may decide not to grant a consent if not satisfied that adverse effects can be appropriately avoided, remedied or mitigated) as part of a consenting process.
42 – Ngati Hine Hapu of Te Atiawa	896	Other Submitter question why the standards, terms and conditions and the control and notification columns are left blank for this Discretionary Activity rule.	No relief necessary Officers note that it is not standard planning practice for Discretionary Activity or Non-complying rules to include standards, terms and conditions. Conditions relating to a Non-complying Activity are developed on a case-by-case basis through the consenting process having regard to the relevant Plan policies.
43 – Royal Forest and Bird Protection Society	897	Other The submitter notes that the installation and placement for petroleum production and drilling activities generate noise, vibration and disturbance which has an	No relief necessary Officers note that amendments have been made to relevant policies in the Plan that address in part some of the matters sought by the submitter in relation to

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		<p>adverse effect on marine species and habitats. The submitter is unclear how the Council will ensure that activities will not have adverse effects that extend into Outstanding Value, Estuaries Unmodified and Estuaries Modified coastal management areas.</p> <p>Submitter seeks amendment to the Plan, as sought, to give effect to policies 11, 13, and 15 of the <i>New Zealand Coastal Policy Statement</i> and so they provide direction for considering consent applications under this rule.</p>	<p>giving effect to policies 11, 13, and 15 of the <i>New Zealand Coastal Policy Statement</i>.</p> <p>Officers note that all matters identified in Policies 1 to 21, 22, 28, 29, 30, 31, 32, 36, 37, 38, 39, 40, 41, 42, 44, 47 and 49 would be considered and given effect to as part of any resource consent application. Officers believe that these policies would provide the necessary direction and guidance to inform Council decision-making (noting that Council may decide not to grant a consent if it is not satisfied that adverse effects can be appropriately avoided, remedied or mitigated).</p>
58 – Te Atiawa	898	<p>Amend</p> <p>Submitter seeks amendment to Rule 29 to include two new Conditions to read:</p> <p><i><u>(a) drilling is not undertaken in the airspace above and in the ground below to the earth's core within any site identified in Schedule 5 [Historic heritage]; and;</u></i></p> <p><i><u>(b) drilling is undertaken at least 6,000m from the line of mean high water springs.</u></i></p>	<p>Decline</p> <p>The submitter has sought the inclusion of standards/terms/conditions for rules in the Plan relating to a Discretionary Activity. Officers decline the relief noting that it is not standard planning practice for Discretionary Activity or Non-complying Activity rules to include standards, terms and conditions.</p> <p>Officers note that the rules differentiate between hydrocarbon exploration activities and later production activities. Due to the increased scale of effects associated with the construction and operation of an offshore petroleum production installation it maybe that a buffer distance of 6,000m from the line of the mean high water springs is appropriate. However, Officers still believe it is appropriate that locational and other considerations be addressed on a case-by-case basis (noting that Council may decide not to grant a consent if not satisfied that adverse effects can be appropriately avoided, remedied or mitigated) as part of a consenting process.</p>
61 – Te Rūnanga o Ngāti Ruanui Trust	899	<p>Amend</p> <p>Submitter seeks amendment to Rule 29 to include standards, terms and conditions to read:</p> <p><i><u>(a) placement of a structure and discharge does not adversely affect the matters/values identified for protection by mana whenua in the cultural impact assessment;</u></i></p> <p><i><u>(b) placement of a structure and discharge complies with tangata whenua indicators referred to in the tangata whenua monitoring plan</u></i></p> <p><i><u>(c) placement of a structure and discharge is consistent with iwi management plan.</u></i></p> <p>AND</p> <p>Include the following notification note:</p> <p><i><u>Resource consent applications under this Rule will be notified to tangata whenua.</u></i></p>	<p>Decline</p> <p>The submitter has sought the inclusion of standards/terms/conditions for rules in the Plan relating to discretionary and non-complying activities.</p> <p>Officers decline the relief noting that it is not standard planning practice for Discretionary Activity or Non-complying rules to include standards, terms and conditions. Conditions relating to a Non-complying Activity are developed on a case by case basis through the consenting process having regard to the relevant Plan policies.</p> <p>Officers note that all matters identified by the submitter would be considered through the consenting process with Policies 1 to 21, 22, 28, 29, 30, 31, 32, 36, 37, 38, 39, 40, 41, 42, 44, 47 and 49 being given effect to.</p> <p>In relation to notification requirements proposed by the submitter, Officers note that the Plan is not intended to provide the operational detail for implementing every</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Further submissions – Te Rūnanga o Ngāti Mutunga (40), Te Korowai o Ngāruahine Trust (41), Te Atiawa (58)		Support	aspect of the Plan. Such detail is more appropriately included in the Council's standard operating procedures and or Mana Whakahono a Rohe agreements.
Rules 29 and 30 – Petroleum production installation erection or placement			
21 – Climate Justice Taranaki	900	<p>Amend</p> <p>Submitter opposes 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>Submitter supports provisions for the maintenance and occupation of space by existing wells and associated infrastructure but seek that the setback distance from sensitive marine benthic habitat (Schedule 4B), reef system or boundary of coastal marine area Outstanding Value be at least 6,000 m.</p>	<p>No relief necessary</p> <p>Officers believe the issues raised by the submitter are already addressed in Rules 29 and 30.</p> <p>Pursuant to Rules 29 and 30 any new production well would require a resource consent as a Discretionary Activity or a Non-complying Activity, depending upon which coastal management area the activity will occur in. Through those rules a resource consent must be obtained, which would involve the consideration of appropriate buffer distances.</p> <p>Officers note that the rules differentiate between hydrocarbon exploration activities and later production activities. Due to the increased scale of effects associated with the construction and operation of an offshore petroleum production installation it maybe that a buffer distance of 6,000m from the line of the mean high water springs is appropriate. However, Officers still believe it is appropriate that locational and other considerations be addressed on a case-by-case basis (noting that Council may decide not to grant a consent if not satisfied that adverse effects can be appropriately avoided, remedied or mitigated) as part of a consenting process.</p>
Further submissions – Petroleum Exploration and Production Association of New Zealand (37)		Oppose	
Further submissions – Te Korowai o Ngāruahine (41)		Support	
Rule 30 – Petroleum production installation erection or placement in coastal management areas: Outstanding Value, Estuaries Unmodified and Estuaries Modified			
21 – Climate Justice Taranaki	901	<p>Amend</p> <p>Amend Rule 30 of the Plan to be a Prohibited Activity (rather than Non-complying).</p>	<p>Decline</p> <p>Officers do not believe it is appropriate to preclude any consideration of an activity being considered regardless of the effects.</p> <p>Officers note that Non-complying Activity is already a very high level of regulatory protection whereby a resource consent cannot be granted unless the effects of the activity are minor and the activity is not contrary to the objectives and policies of the Plan. Of note the policies themselves are very prescriptive.</p>
Further submissions – Department of Conservation (29)		Support	
Further submissions – Petroleum Exploration and Production Association of New Zealand (37)		Oppose	
	902	Support	Accept

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
25 – New Zealand Petroleum and Minerals		Retain Rule 30 of the Plan as notified.	Support noted.
Further submissions – Port Taranaki Ltd (32)		Support	
40 – Te Rūnanga o Ngāti Mutunga	903	Support Retain Rule 30 of the Plan as notified.	Accept Support noted.
Further submissions – Petroleum Exploration and Production Association of New Zealand (37)		Support	
42 – Ngati Hine Hapu of Te Atiawa	904	Other Submitter question why the standards, terms and conditions and the control and notification columns are left blank for this Non-complying Activity rule.	No relief necessary The submitter has sought the inclusion of standards/terms/conditions for rules in the Plan relating to discretionary and non-complying activities. Officers note that it is not standard planning practice for Discretionary Activity or Non-complying rules to include standards, terms and conditions. Conditions relating to a Non-complying Activity are developed on a case-by-case basis through the consenting process having regard to the relevant Plan policies.
43 – Royal Forest and Bird Protection Society	905	Amend Submitter seeks amendment to Rule 30 of the Plan to make erection or placement of petroleum production installations in the Outstanding Value, Estuaries Unmodified and Estuaries Modified coastal management areas a Prohibited Activity (rather than a Non-complying Activity).	Decline Officers do not believe it is appropriate to preclude any consideration of the placement of petroleum production installations in the Outstanding Value, Estuaries Unmodified and Estuaries Modified coastal management areas being considered regardless of the effects. Officers note that Non-complying Activity is already a very high level of regulatory protection whereby a resource consent cannot be granted unless the effects of the activity are minor and the activity is not contrary to the objectives and policies of the Plan. Of note the policies themselves are very prescriptive.
Further submissions – Petroleum Exploration and Production Association of New Zealand (37)		Oppose	
51 – Taranaki Energy Watch	906	Amend Submitter seeks amendment to Rule 30 of the Plan to make erection or placement of petroleum production installations in the Outstanding Value, Estuaries	Decline Officers note that Non-complying Activity is already a very high level of regulatory protection whereby a resource consent cannot be granted unless the effects of the

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		Unmodified and Estuaries Modified coastal management areas a Prohibited Activity (rather than a Non-complying Activity).	activity are minor and the activity is not contrary to the objectives and policies of the Plan. Of note the policies themselves are very prescriptive.
Further submissions – Petroleum Exploration and Production Association of New Zealand (37)		Oppose	Officers do not believe it is appropriate to preclude any consideration of an activity being considered regardless of the effects.
58 – Te Atiawa	907	Support	Accept
		Retain Rule 30 of the Plan as notified.	Support noted.
Further submissions – Petroleum Exploration and Production Association of New Zealand (37)		Support	
61 – Te Rūnanga o Ngāti Ruanui Trust	908	Amend	Decline
		Submitter seeks amendment to the standards, terms and conditions of Rule 30 of the Plan to read: <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> <u>(b) placement of structure and discharge complies with tangata whenua indicators referred to in the tangata whenua monitoring plan</u> <u>(c) placement of structure and discharge is consistent with iwi management plan</u> AND include as a control/notification: <i>Resource consent applications under this rule will be notified to tangata whenua.</i>	The submitter has sought the inclusion of standards/terms/conditions for rules in the Plan relating to discretionary and non-complying activities. Officers decline the relief noting that it is not standard planning practice for Discretionary Activity or Non-complying rules to include standards, terms and conditions. Conditions relating to a Non-complying Activity are developed on a case-by-case basis through the consenting process having regard to the relevant Plan policies. Officers note that all matters identified by the submitter would be considered through the consenting process with Policies 1 to 21, 22, 28, 29, 30, 31, 32, 36, 37, 38, 39, 40, 41, 42, 44, 47 and 49 being given effect to. In relation to notification requirements proposed by the submitter, officers note that the Plan is not intended to provide the operational detail for implementing every aspect of the Plan. Such detail is more appropriately included in the Council's standard operating procedures and/or any Mana Whakahohe a Rohe agreements.
Further submissions – Te Rūnanga o Ngāti Mutunga (40), Te Korowai o Ngāruahine Trust (41), Te Atiawa (58)		Support	
Rule 31– Temporary military training			
	909	Amend	Decline

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
29 – Department of Conservation		Submitter seeks amendment to Rule 31 to exclude its application to coastal management areas Estuaries Unmodified.	Officers consider the relief sought to be unnecessary and excessive. Officers note that granting the relief sought would exclude the New Zealand Defence Force from carrying out temporary military training exercises in and around a number of Taranaki coastal settlements (such as New Plymouth, Waitara, Urenui and Patea) as a Permitted Activity. This is despite the activity being a Permitted Activity in the current Plan and for which there have been no issues to date.
Further submissions – Climate Justice Taranaki Inc (21)		Support in part	
Further submissions – New Zealand Defence Force (33)		Oppose in part	
33 – New Zealand Defence Force	910	<p>Amend</p> <p>Rule 31 is supported by the New Zealand Defence Force but, seek amendments to the conditions of the rule in the following areas:</p> <ul style="list-style-type: none"> (a) is amended to allow temporary military training to occur for a duration of up to 31 day (d) is removed in its entirety [...] <i>written notice is given to the adjacent territorial authority at least five working days prior to the activity commencing; [...]</i> (g) is affected by an amendment to General Standard 8.6.3 [noise] (h) and (j) are retained as notified. 	<p>Accept in part</p> <p>Officers recommend granting most of the reliefs sought by the submitter. Specific comments on each of their submission points are as follows:</p> <ul style="list-style-type: none"> accept in part: The submitter noted that most temporary military training can be completed in a 31 duration period and sought that this be provided for noting that they have sought a similar duration in other plans around the country. Officers recommend increasing the duration period from 21 days to 30 days noting that this is in alignment with that in other plans around the country and in the interests of inter-regional consistency. accept: officers recommend deleting a Condition (d) and the requirement to notify another jurisdictional authority. refer to submission point 1156 in relation to Officers response on amendments sought to General Standard 8.6.3 [noise]. accept: Officers note submitter's support for retaining Conditions (h) and (j).
Further submissions – Climate Justice Taranaki Inc (21)		Oppose	
41 – Te Korowai o Ngāruahine Trust	911	<p>Amend</p> <p>Submitter seeks amendment to Condition (j) of Rule 31 of the Plan to read: <i>(b) activity does not have an adverse effect on the values associated with historic heritage identified in Schedule 5A and B Historic heritage; [...]</i></p>	<p>Accept</p> <p>Officers recommend granting the relief sought by the submitter.</p>
Further submissions – New Zealand Defence Force (33)		Support	
	912	Amend	Decline

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
42 – Ngati Hine Hapu of Te Atiawa		Submitter seeks amendment to Rule 31 of the Plan to make temporary military training a Controlled Activity (rather than a Permitted Activity) AND that there be iwi/hapū consultation in all cases.	Officers consider the relief sought to be unnecessary and excessive. Officers note temporary military training exercises are already a Permitted Activity in the current Plan for which there have been no issues identified to date. Notwithstanding the above, Officers note that temporary training activities not able to comply with the standards, terms and conditions of Rule 31 are a Controlled Activity under Rule 32 or a Discretionary or Non-complying Activity under Rules 33 and 34, depending on the coastal management area involved. Officers further note Guidance note (1) of that rule that states that iwi authorities that have requested to be informed of this activity will be advised by Council.
Further submissions – Te Korowai o Ngāruahine Trust (41)		Support	
Further submissions – New Zealand Defence Force (33)		Oppose	
43 – Royal Forest and Bird Protection Society	913	Amend Submitter seeks amendment to Rule 31 of the Plan by deleting the Estuaries Unmodified and Estuaries Modified coastal management areas from the rule.	Decline Officers do not recommend granting the relief sought by the submitter noting that temporary military training exercises are already a Permitted Activity for these areas in the current Plan for which there have been no issues identified to date. Officer agree with the submitter in terms of the importance of estuaries to indigenous species but believe the issue has been adequately addressed in the Plan. Of note Conditions (c) and (k) are particularly relevant. Condition (k) means the activity is subject to the activity being of a scale/type/time/location that it 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]. Many training activities are of a type or carried out at a time that impacts on indigenous biodiversity should not be an issue. However, through Condition (c), which requires that the Council be notified at least five working days prior to the activity being undertaken, Council will have the opportunity to consider the proposed activity and confirm that that is the case (noting that Council's GIS and other information systems are a significant repository of biodiversity information). If, in the Council's view the activity is of a type or being carried out at a time that there are likely to be adverse impacts on indigenous biodiversity, a resource consent would be required under Rules 32, 33 or 34.
Further submissions – Climate Justice Taranaki Inc (21)		Support in part	
Further submissions – New Zealand Defence Force (33)		Oppose	
43 – Royal Forest and Bird Protection Society	914	Amend Submitter seeks amendment to Rule 31 of the Plan by adding a standard, term and 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.	No relief necessary Officers do not believe the amendments sought by the submitter are necessary noting that temporary military training exercises can take a number of forms, only some of which might involve noise and explosions. The effect of those activities are

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Further submissions – Climate Justice Taranaki Inc (21)		Support in part	likely to differ depending upon where and when it is carried out. To preclude certain type of activities regardless of the likely adverse effect is not considered appropriate and would be unnecessarily restrictive. Officers note that temporary military training exercises are already a Permitted Activity for these areas in the current Plan for which there have been no issues identified to date. Notwithstanding that Officers note that the Rule includes a number of new conditions. Conditions (c) and (k) are particularly relevant. Condition (k) means the activity is subject to the activity being of a scale/type/time/location that it 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]. Many training activities are of a type or carried out at a time that impacts on indigenous biodiversity should not be an issue. However, through Condition (c), which requires that the Council be notified at least five working days prior to the activity being undertaken, Council will have the opportunity to consider the proposed activity and confirm that that is the case (noting that Council's GIS and other information systems are a significant repository of biodiversity information). If, in the Council's view the activity is of a type or being carried out at a time that there are likely to be adverse impacts on indigenous biodiversity, a resource consent would be required under Rules 32, 33 or 34.
Further submissions – New Zealand Defence Force (33)		Oppose	
43 – Royal Forest and Bird Protection Society	915	Amend Submitter seeks amendment to Rule 31 by adding new standard, term and condition to that the activities must not have lighting at night.	Decline Officers note that Rule 31 needs to be read in conjunction with the General Standards set out in Section 8.6 of the Plan which addresses lighting matters.
Further submissions – Climate Justice Taranaki Inc (21)		Support in part	Decline Officers recommend declining the relief sought by the submitter. Officers note the broad RMA definition of historic heritage, which includes sites and places of significance to Maori. Through this Plan review process most estuaries and reefs have been identified by iwi as significant historic heritage. Accordingly, the relief sought would unnecessarily preclude temporary military training exercises
57 – Heritage New Zealand	916	Amend Submitter seeks amendment to the conditions of Rule 31(j) to read: <i>(j) activity does not have an adverse effect on the value associated with historic heritage identified in Schedule 5 [Historic Heritage]; and <u>structures and activities are not to be placed at any site identified in Schedule 5; and [...]</u></i>	
Further submissions – Climate Justice Taranaki Inc (21)		Support in part	

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Further submissions – New Zealand Defence Force (33)		Oppose	<p>over large parts of the Taranaki coastline regardless of whether the activity is of a type/scale/time/location that it would have an impact on those values.</p> <p>Officers note that temporary military training exercises are already a Permitted Activity for these areas in the current Plan for which there have been no issues identified to date. Notwithstanding that, officers note that the Rule includes a number of new conditions. Conditions (c) and (j) are particularly relevant. Condition (j) means the activity is subject to the activity being of a scale/type/time/location that it does not have an adverse effect on the values associated with historic heritage identified in Schedule 5A and B (41) [Historic heritage]. Many training activities are of a type or carried out at a time that impacts on historic heritage values, e.g. mahinga kai, should not be an issue. However, through Condition (c), which requires that the Council be notified at least five working days prior to the activity being undertaken, Council will have the opportunity to consider the proposed activity and confirm that that is the case.</p> <p>If, in the Council's view the activity is of a type or being carried out at a time that there are likely to be adverse impacts on historic heritage, a resource consent would be required under Rules 32, 33 or 34.</p>
61 – Te Rūnanga o Ngāti Ruanui Trust	917	<p>Amend</p> <p>Submitter seeks amendment to Rule 31 of the Plan to include new or amended standards, terms and conditions to read:</p> <p>[...]</p> <p><i>(j) activity does not have an adverse effect on the values associated with <u>cultural and historic heritage identified in Schedule 5 [Cultural and Historic heritage];</u></i></p> <p><i><u>(k) activity and discharge does not have adverse effect on Schedules 1 and 2;</u></i></p> <p><i><u>(l) activity and discharge does not adversely affect the suitability of the receiving water for customary use;</u></i></p> <p><i><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></i></p> <p><i><u>(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] and taonga species protected under Taranaki iwi Deed of Settlement including those identified in Schedule 4C [Taonga species and habitat].</u></i></p>	<p>Accept in part</p> <p>Officers note that Rule 31 provides for the temporary military training in the coastal marine area, subject to the appropriate management of adverse effects. Through the standards, terms and conditions of the Rule, relevant environmental effects on historic heritage, indigenous biodiversity and use and enjoyment of the coast will be appropriately managed. Other adverse effects within the coastal marine area, e.g. water quality are likely to be less than minor and temporary. Of note, temporary military training exercises are already a Permitted Activity for these areas in the current Plan for which there have been no issues identified to date.</p> <p>The submitter seeks to introduce a number of new and amended standards, terms and conditions to the Rule. Specific comments on the new and amended proposed conditions are as follows:</p> <ul style="list-style-type: none"> decline the relief sought in relation to Condition (j). Officers refer the submitter to previous comments made on expanding the scope of historic heritage

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Further submissions – Climate Justice Taranaki Inc (21)		Support in part	<ul style="list-style-type: none"> relief sought in relation to Condition (k) is unnecessary and uncertain for Plan users. The Rule is only allowing incidental discharges of sediment that might arise from the training exercises. Other discharges are addressed by other rules. Officers further note that the effect of granting this relief would be to make this rule redundant as it requires no adverse effects (including less than minor) across the whole coastal marine area, noting that Schedules 1 and 2 capture the whole coastal marine area plus landward parts of the coastal environment identified as having outstanding natural character or being an outstanding natural feature or landscape relief sought in relation to Condition (l) is unnecessary. Such matters are largely already addressed in Condition (j) of the Plan, which protects customary sites of significance. However, it is noted that any impacts on receiving water quality will be temporary and unlikely to be noticeable in natural prevailing conditions relief sought in relation to Condition (m) is unnecessary. The submitter proposes to include a new standard (m), however, the reference to sites of significance to Māori located in Schedule 5B has already been included within Condition (j) of the Rule. It is not necessary to repeat this Condition using different wording. grant the relief in kind in relation to Condition (n). Officers recommend expanding the scope of Rule conditions to include reference to scheduled taonga species.
Further submissions – New Zealand Defence Force (33)		Oppose in part	
Further submissions – Te Korowai o Ngāruahine Trust (41)		Support	
Rules 31 and 32 – Temporary military training			
21 – Climate Justice Taranaki	918	Amend	Decline
		Submitter opposes Rules 31 and 32 providing for temporary military training.	No precise details of amendments sought to the Plan have been provided. However, Officers note that temporary military training exercises are already a Permitted Activity for these areas in the current Plan for which there have been no issues identified to date.
Further submissions – New Zealand Defence Force (33)		Oppose	
Rule 32 – Temporary military training			
	919	Other	No relief necessary

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
15 – Surfbreak Protection Society		Submitter seeks 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.	Submitter's comments are noted and have been previously addressed in submission points 443 relating to surfing policies. Policy 19 would be considered as part of any resource consent application under this Rule. Officers note that matters relating to affected and interested party status and limited notification are addressed separately in accordance with the Council's consenting standard operating procedures.
Further submissions – New Zealand Defence Force (33)		Support in part	
29 – Department of Conservation	920	<p>Amend</p> <p>Submitter seeks amendment to Rule 32 of the Plan by:</p> <ul style="list-style-type: none"> excluding its application to coastal management areas of "Estuaries Unmodified" including a condition after (c) that reads occupation is for a period of no more than three consecutive weeks amending the advice note to: [...] refer to Rule 32 33 and 33 34 [...] 	<p>Grant in part</p> <p>Officers note that Rule 32 seeks to provide for the temporary military training in the coastal marine area as a Controlled Activity, subject to the appropriate management of adverse effects. Through the standards, terms and conditions of the Rule, relevant environmental effects on historic heritage, indigenous biodiversity and use and enjoyment of the coast will be appropriately managed.</p> <p>The submitter seeks a number of amendments to the Rule. Specific comments on the new and amended proposed conditions are as follows:</p> <ul style="list-style-type: none"> decline the relief sought in terms of excluding Estuaries Unmodified. As previously noted, Officers consider the relief sought to be unnecessary and excessive. Officers note that granting the relief sought would exclude the New Zealand Defence Force from carrying out temporary military training exercises in and around a number of Taranaki coastal settlements (such as New Plymouth, Waitara, Oakura, Urenui and Patea) as a Permitted Activity. decline the relief sought. Officers note that the New Zealand Defence Force has sought changes to the Permitted Activity rule that would allow temporary activities to occur over 31 days. Officers further note that the Rule's matters of control include consideration of the duration of the consent and do not believe it necessary to confine this rule to a specific duration. Such matters can be appropriately considered on a case-by-case basis as part of the consenting process. grant the relief sought in relation to the Advice Note. The submitter has highlighted a typographical error in the Advice Note that needs to be corrected.
Further submissions – Climate Justice Taranaki Inc (21), New Zealand Defence Force (33)		Support in part	
	921	Support	Accept

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
33 - New Zealand Defence Force		Retain Rule 32 of the Plan as notified.	Support noted.
41 – Te Korowai o Ngāruahine Trust	922	Amend	Accept Officers recommend granting the relief sought by the submitter.
		Submitter seeks amendment to Condition (b) of Rule 32 to read: <i>(b) activity does not have an adverse effect on the values associated with historic heritage identified in Schedule 5 A and B Historic heritage; [...]</i>	
Further submissions – New Zealand Defence Force (33)		Support	
43 – Royal Forest and Bird Protection Society	923	Amend	Decline Officers consider the relief sought to be unnecessary and excessive. Officers note that granting the relief sought would impose unnecessary constraints and costs on the New Zealand Defence Force from carrying out temporary military training exercises. This is despite there being an equivalent Controlled Activity rule in the current Plan and for which there have been no issues to date. Of note, as part of this Coastal Plan review, there has been little support for the inclusion of Restricted Discretionary Activities. This Council has adopted a precautionary approach whereby, if uncertain that effects can be adequately identified and addressed as a Permitted Activity or Controlled Activity, it has determined that the effects will be considered as a fully Discretionary Activity to ensure issues are fully and comprehensively canvassed.
		Submitter seeks amendment to Rule 32 of the Plan to make temporary military training under this rule a Restricted Discretionary Activity (rather than a Controlled Activity).	
Further submissions – Climate Justice Taranaki Inc (21)		Support in part	
Further submissions – New Zealand Defence Force (33)		Oppose	
61 – Te Rūnanga o Ngāti Ruanui Trust	924	Amend	Accept in part The submitter seeks to introduce a number of new and amended standards, terms and conditions to the Rule. Specific comments on the new and amended proposed conditions are as follows: <ul style="list-style-type: none"> decline the relief sought in relation to Condition (b). Officers refer the submitter to previous comments made on expanding the scope of historic heritage relief sought in relation to Condition (c) is unnecessary and uncertain for Plan users. The Rule is only allowing incidental discharges of sediment that might arise from the training exercises. Other discharges are addressed by other rules. Officers further note that the effect of granting
		Submitter seeks amendment to Rule 32 of the Plan to include new or amended standards/terms/conditions to read: <i>(b) activity does not have an adverse effect on the values associated with cultural and historic heritage identified in Schedule 5 [Cultural and Historic heritage];</i> <i>(c) the discharge does not have adverse effect on Schedules 1 and 2;</i> <i>(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;</i> <i>(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</i>	

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		<p><u><i>species protected under Taranaki iwi Deed of Settlement including those identified in Schedule 4C [Taonga species and habitat]</i></u></p> <p><u><i>(f) the discharge does not adversely affect the suitability of the receiving area for customary use</i></u></p> <p><u><i>(g) discharge does not adversely affect the matters/values identified for protection by mana whenua in the cultural impact assessment;</i></u></p> <p><u><i>(h) discharge complies with tangata whenua indicators referred to in the tangata whenua monitoring plan</i></u></p> <p><u><i>(i) discharge is consistent with iwi management plan.</i></u></p>	<p>this relief would be to make this rule redundant as it requires no adverse effects (including less than minor) across the whole coastal marine area, noting that Schedules 1 and 2 capture the whole coastal marine area plus landward parts of the coastal environment identified as having outstanding natural character or being an outstanding natural feature or landscape</p> <ul style="list-style-type: none"> reliefs sought in relation to Condition (d) and (f) are unnecessary. Such matters are largely already addressed in Condition (b) of the Rule, which protects customary sites of significance. However, it is noted that any impacts on receiving water quality will be temporary and unlikely to be noticeable in natural prevailing conditions grant the relief in kind in relation to Condition (e). Officers recommend expanding the scope of Rule conditions to include reference to scheduled taonga species. decline the relief sought in relation to Condition (g), (h) and (i) as being uncertain in terms of their application and given the details as to managing effects on water quality and monitoring are already identified in the rule as matters of control.
Further submissions – Climate Justice Taranaki Inc (21)		Support in part	
Further submissions – New Zealand Defence Force (33)		Oppose	
61 – Te Rūnanga o Ngāti Ruanui Trust	925	<p>Amend</p> <p>Submitter seeks amendment to the Control/notification column for Rule 32 of the Plan to read:</p> <p><i>Control is reserved over:</i></p> <p>[...]</p> <p><u><i>(e) effects on water quality and mauri values;</i></u></p> <p>[...]</p> <p><u><i>(m) effects on Cultural Zone (referred to in Spatial Plan);</i></u></p> <p><u><i>(n) monitoring (including tangata whenua indicators referred to in the tangata whenua monitoring plan) and information requirements;</i></u></p> <p><i>(o) duration of consent; and</i></p> <p><i>(p) review of consent conditions.</i></p> <p>Resource consent applications under this Rule will not be publicly notified but may be limited notified <u><i>be notified to tangata whenua.</i></u></p>	<p>Decline</p> <p>The suggested changes seem to be mixing jurisdictional, policy and operational matters and introducing a level of specificity that is not considered appropriate or necessary. Most of the changes sought are a subset of matters that have already been provided for while the submitter has also introduced some new concepts such as a cultural zone and a spatial plan that do not fit within the Proposed Plan framework. There is also a 'requirement' to be consistent with iwi management plans, while the submitter is silent on how other planning documents might fit within this framework.</p> <p>Officers note that this activity is already subject to the General Policies 1 to 21 of which Policies 15 [Historic heritage] and 16 [Relationship of tangata whenua] are particularly relevant. Officers further note that there will be an opportunity to develop an agreed framework and operational detail for implementing the Plan as part of any Mana Whakahono a Rohe agreement with the submitter.</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Further submissions – Climate Justice Taranaki Inc (21)		Support in part	
Further submissions – New Zealand Defence Force (33)		Oppose	
NEW Rule 32A – Temporary military training			
29 – Department of Conservation	926	Amend Submitter seeks amendment to the Plan 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.	Accept in kind Officers recommend amending the Activity Description of Rules 33 and 34 to include temporary military training activities.
Further submissions – New Zealand Defence Force (33)		Support	
Rule 33 – Other structure erection or placement			
6 – Trans-Tasman Resources Ltd	927	Support Retain Rule 33 of the Plan as notified.	Accept Support noted.
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Oppose	
26 – Transpower NZ Ltd	928	Amend Submitter supports Rule 33 but seek amendment to delete reference to <i>National Environmental Standards for Electricity Transmission Activities</i> : [...] or the Resource Management (National Environmental Standards for Electricity Transmission Activities Regulations 2009 (Appendix 6))	Accept The reference to the <i>National Environmental Standards for Electricity Transmission</i> is redundant and does not add further value to the Plan. Officers recommend granting the relief sought by the submitter.
32 – Port Taranaki	929	Amend Submitter seeks amendment to Rule 33 of the Plan to provide for hard protection structures within the Port coastal management area not provided for in rules 18-32 to be a Controlled Activity.	Decline Officers recommend declining the relief sought by the submitter. Officers note that this Rule is an existing rule in the current Plan that provides a consenting pathway to authorise activities not otherwise provided for in the preceding rules. Given it is too difficult to envisage or foresee every form or type of activity that might take place in the coastal marine area, a catch-all rule is considered appropriate. Officers do not consider it appropriate in such circumstances to differentiate between the

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
			Port and other activities given that, in accordance with the <i>New Zealand Coastal Policy Statement</i> and the policies of this Plan (particularly Policy 34), there is an expectation that hard protection structures will be discouraged and the use of alternatives promoted. This expectation is unlikely to be realised as a Controlled Activity.
32 – Port Taranaki	930	Amend Submitter seeks amendment to Rule 33 of the Plan to provide an exception for Port Taranaki Ltd within the Port coastal management area for flood protection structures (similar or same definition as in the draft New Plymouth District Plan) to be Permitted Activities.	No relief necessary Officers do not believe any relief is necessary. Officers are unclear what flood protection structure exist within the Port Taranaki coastal management area noting that the rules are confined to the coastal marine area.
43 – Royal Forest and Bird Protection Society	931	Amend Submitter seeks amendment to Rule 33 of the Plan to exclude Estuaries Modified coastal management areas from the Discretionary Activity rule.	Decline Officers recommend to declining the relief sought by the submitter and that Rule 33 continues to apply to Estuaries Modified coastal management areas. Officers note there are significant urban areas that would be affected by the relief sought by the submitter such as New Plymouth, Waitara, Oakura, Urenui and Patea. The proposed rules regime recognises that these estuaries have already been modified and already include structures within the coastal marine area that contribute to social, cultural, economic and environmental wellbeing of local communities. However, through the resource consents process the appropriateness of further use and development can be considered having regard to General Policies 1 to 21 and Activity-based Policies 31, 32, 33, 34, 35, 39 and 49.
Further submissions – Climate Justice Taranaki Inc (21)		Support	
45 – Powerco	932	Support Retain Rule 33 of the Plan as notified.	Accept Support noted.
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Oppose	
46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	933	Support Retain Rule 33 of the Plan as notified.	Accept Support noted.
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Oppose	

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
47 – Fonterra	934	Support Retain Rule 33 of the Plan as notified.	Accept Support noted.
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Oppose	
59 – KiwiRail	935	Support Retain Rule 33 of the Plan as notified.	Accept Support noted.
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Oppose	
61 – Te Rūnanga o Ngāti Ruanui Trust	936	Amend Submitter seeks amendment to Rule 33 of the Plan to include standards, terms and conditions to read: <i><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></i> <i><u>(b) placement of structure and discharge complies with tangata whenua indicators referred to in the tangata whenua monitoring plan</u></i> <i><u>(c) placement of structure and discharge is consistent with iwi management plan.</u></i> AND Include the following notification note: <i><u>Resource consent applications under this Rule will be notified to tangata whenua.</u></i>	Decline The submitter has sought the inclusion of standards/terms/conditions for rules in the Plan relating to Discretionary and Non-complying Activities. Officers decline the relief noting that it is not standard planning practice for Discretionary Activity or Non-complying rules to include standards, terms and conditions. Conditions relating to a Non-complying Activity are developed on a case-by-case basis through the consenting process having regard to the relevant Plan policies. Officers note that all matters identified by the submitter would be considered through the consenting process with General Policies 1 to 21 and Activity-based Policies 31, 32, 33, 34, 35, 39 and 49 being given effect to. In relation to notification requirements proposed by the submitter, Officers note that the Plan is not intended to provide the operational detail for implementing every aspect of the Plan. Such detail is more appropriately included in the Council's standard operating procedures and/or any Mana Whakahono a Rohe agreements.
Further submissions – Trans-Tasman Resources Ltd (6), Transpower NZ Ltd (26)		Oppose	
Further submissions – Climate Justice Taranaki Inc (21), Te Rūnanga o Ngāti Mutunga (40), Te Korowai o Ngāruahine Trust (41), Te Atiawa (58)		Support	
Rule 34 – Other structure erection or placement			

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
6 – Trans-Tasman Resources Ltd	937	Support Retain Rule 34 of the Plan as notified.	Accept Support noted.
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Oppose	
26 – Transpower NZ Ltd	938	Amend Submitter supports Rule 34, but seeks amendment to delete reference to <i>National Environmental Standards for Electricity Transmission Activities</i> : [...] or the Resource Management (National Environmental Standards for Electricity Transmission Activities Regulations 2009 (Appendix 6)).	Accept The reference to the <i>National Environmental Standards for Electricity Transmission</i> is redundant and does not add further value to the Plan. Officers recommend granting the relief sought by the submitter.
30 – First Gas Ltd	939	Amend Submitter seeks amendment to Rule 34 of the Plan 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).	Decline Officers recommend declining the relief sought by the submitters. The merits of providing for the placement of utility structures need to be carefully considered in relation to potential adverse effects on areas identified as having outstanding (exceptional) natural character, features and landscapes. Such matters need to be considered on a case-by-case basis as a Discretionary Activity rather than a Controlled Activity whereby the consent would always be allowed.
Further submissions – Department of Conservation (29), Te Rūnanga o Ngāti Ruanui Trust (61)		Oppose	
Further submissions – Powerco (45)		Support in part	
30 – First Gas Ltd	940	Amend Submitter seeks amendment to the standards, terms and conditions for Rule 34 of the Plan, similar in kind to those of Rule 22.	Decline Officers recommend declining the relief sought by the submitter. Refer submission point 939 above.
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Oppose	
43 – Royal Forest and Bird Protection Society	941	Amend Submitter seeks amendment to Rule 34 of the Plan to include Estuaries Modified coastal management areas in the Non-complying Activity rule.	Decline Officers note there are significant urban areas that would be affected by the relief sought by the submitter such as New Plymouth, Waitara, and Patea. The proposed

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Further submissions – Climate Justice Taranaki Inc (21)		Support	rules regime recognises that these estuaries have already been modified and already include structures within the coastal marine area that contribute to social, cultural, economic and environmental wellbeing of local communities. However, through the resource consents process the appropriateness of further use and development can be considered having regard to General Policies 1 to 21 and Activity-based Policies 31, 32, 33, 34, 35, 39 and 49.
45 – Powerco	942	Support	Accept
		Retain Rule 34 of the Plan as notified.	Support noted.
Further submissions – Port Taranaki Ltd (32)		Support	
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Oppose	
61 – Te Rūnanga o Ngāti Ruanui Trust	943	Amend	Decline
		<p>Submitter seeks amendment to Rule 34 of the Plan to include standards, terms and conditions to read:</p> <p><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></p> <p><i>(b) placement of structure and discharge complies with tangata whenua indicators referred to in the tangata whenua monitoring plan</i></p> <p><i>(c) placement of structure and discharge is consistent with iwi management plan</i></p> <p>AND</p> <p>Include the following notification note:</p> <p><i>Resource consent applications under this Rule will be notified to tangata whenua.</i></p>	<p>The submitter has sought the inclusion of standards/terms/conditions for rules in the Plan relating to discretionary and non-complying activities.</p> <p>Officers decline the relief noting that it is not standard planning practice for Discretionary Activity or Non-complying rules to include standards, terms and conditions. Conditions relating to a Non-complying Activity are developed on a case-by-case basis through the consenting process having regard to the relevant Plan policies.</p> <p>Officers note that all matters identified by the submitter would be considered through the consenting process with Policies 1 to 21, 31, 32, 33, 34, 35, 39 and 49 being given effect to.</p> <p>In relation to notification requirements proposed by the submitter, officers note that the Plan is not intended to provide the operational detail for implementing every aspect of the Plan. Such detail is more appropriately included in the Council's standard operating procedures and/or any Mana Whakahono a Rohe agreements.</p>
Further submissions – Trans-Tasman Resources Ltd (6), Transpower NZ Ltd (26)		Oppose	
Further submissions – Climate Justice Taranaki Inc (21), Te Rūnanga o Ngāti Mutunga (40), Te		Support	

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Korowai o Ngāruahine Trust (41), Te Atiawa (58)			
NEW Rule 34A – Other structure erection or placement			
26 – Transpower NZ Ltd	944	<p>Amend</p> <p>Submitter seeks amendment to 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:</p> <p><i><u>Structure erection or placement associated with Regionally Significant Infrastructure (or the National Grid) and any associated works:</u></i></p> <p><i><u>(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></p>	<p>Decline</p> <p>Officers recommend declining the relief sought by the submitter.</p> <p>Officers also do not believe it necessary to have a new Rule addressing the placement of Regionally Important Infrastructure in Outstanding Value and Estuaries Unmodified coastal management areas. Officers do not consider it appropriate in such circumstances to differentiate between the Regional Important Infrastructure in such areas and other activities. Outstanding Value and Estuaries Unmodified have exceptional/significant values and it is appropriate that they have high levels of protection under the Plan.</p> <p>Officers note that applications for a resource consent for Regionally Important Infrastructure may still be considered under Rule 34 as a Non-complying Activity. While officers recognise that Non-complying Activities represent a very high level of regulatory protection it is noted that a resource consent can still be granted where the effects of the activity are less than minor and the activity is not contrary to the objectives and policies of the Plan.</p>
Further submissions – Department of Conservation (29), Royal Forest and Bird Protection Society (43)		Oppose	
Further submissions – Powerco (45)		Support in part	
Rule 35 – Maintenance repair of existing lawfully established structures			
21 – Climate Justice Taranaki	945	<p>Amend</p> <p>Submitter seeks amendment to Rule 35 [Existing lawfully established structure maintenance and repair] o the Plan to make the activity Discretionary (rather than a Permitted Activity).</p>	<p>Decline</p> <p>Officers do not believe it appropriate to require this activity to be a Discretionary Activity.</p> <p>Officers note that Rule 35 is providing for the ongoing maintenance, repair or minor alterations to already existing lawfully established structures in the coastal marine area. Subject to compliance with the standards, terms and conditions of the Rule, any adverse effects should be less than minor.</p> <p>The erection and placement of new structures are addressed in separate rules. Officers note that granting the relief would have the perverse outcome of making the authorisation for the maintenance of a structure more restrictive than its original placement.</p>
	946	Amend	Accept

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
26 – Transpower NZ Ltd		Submitter seeks amendment to Rule 35 of the Plan to delete reference to National Environmental Standards for Electricity Transmission Activities: [...] <i>or the Resource Management (National Environmental Standards for Electricity Transmission Activities Regulations 2009 (Appendix 6))</i> .	The reference to the <i>National Environmental Standards for Electricity Transmission</i> is redundant and does not add further value to the Plan. Officers recommend granting the relief sought by the submitter.
29 – Department of Conservation	947	Amend Submitter seeks amendment to Rule 35 of the Plan to include new conditions addressing: <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 and that methods should be employed to avoid any fuel spillage. 	Decline Officers recommend declining the relief sought by the submitter. Similar type conditions have been considered as part of the Plan review process and were not deemed to be necessary. Most of the proposed conditions seem to relate to avoiding, remedying or mitigating adverse effects already addressed in Conditions (d) and (e). However, officers are concerned that the specificity sought by the submitter unnecessarily restricts the application of the rule and imposes operational constraints on those using it. For example, the requirement to remove spoil within 24 hours.
Further submissions ⁴⁵ – Powerco (45), Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd (46)		Oppose	
32 – Port Taranaki	948	Amend Submitter seeks amendment to Rule 35 of the Plan to include the Port coastal management area to this rule	Accept in kind Officers recommend granting the relief sought by the submitter.
32 – Port Taranaki	949	Amend Submitter seeks amendment to Rule 35 of the Plan to clarify the rule to enable clear determination of minor alteration as a Permitted Activity.	Accept Officers recommend granting the relief sought by the submitter. It is recommended that Rules relating to maintenance, alterations, extensions and removal be reframed to more clearly differentiate between the respective activities based upon changes in their areal extent or 'footprint'. Consequential changes have also been made to the Plan's definition for "maintenance" and new definitions for "alteration" and "extension" are also proposed.
	950	Amend	Decline

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
41 – Te Korowai o Ngāruahine Trust		Submitter seeks amendment to Rule 35 of the Plan to require notification to iwi of any maintenance, repair or minor alteration work of lawfully established structures in the coastal marine area.	In relation to notification requirements proposed by the submitter, Officers note that the Plan is not intended to provide the operational detail for implementing every aspect of the Plan. Such detail is more appropriately included in the Council's standard operating procedures and/or any Mana Whakahono a Rohe agreements.
Further submissions – Transpower NZ Ltd (26)		Oppose	
43 – Royal Forest and Bird Protection Society	951	<p>Amend</p> <p>Submitter seeks amendment to the Activity Description of Rule 35 of the Plan to read: <i>Structure maintenance, repair or minor alteration [...]</i></p>	<p>Accept</p> <p>Officers recommend granting the relief sought by the submitter.</p> <p>Officers recommend that rules relating to maintenance, alterations, extensions and removal be reframed to more clearly differentiate between the respective activities based upon changes in their areal extent or 'footprint'. Consequential changes have also been made to the Plan's definition for "maintenance" and new definitions for "alteration" and "extension" are also proposed. Officers recognise that both the maintenance and alteration of structures in the coastal marine area may involve repairs.</p>
45 – Powerco	952	<p>Amend</p> <p>Submitter seeks amendment to Rule 35(a) of the Plan to read: [...] (a) size of the structure, including length, width and height, does not increase beyond original size (except for existing communications cables or electricity transmission <u>or distribution</u> lines where <i>these activities do not result in an increase in the design voltage and</i> the new or altered cables or lines are not lower in height above the foreshore or seabed) OR (a) size of the structure, including length, width and height, does not increase beyond original size (except for existing communications cables or electricity transmission <u>or distribution</u> lines where these activities do not result in an increase in the design voltage <u>above 33kV</u> and the new or altered cables or lines are not lower in height above the foreshore or seabed)</p>	<p>Accept</p> <p>Officers recommend granting the relief sought by the submitter.</p>
46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	953	<p>Amend</p> <p>Submitter seeks amendment to Rule 35 of the Plan to:</p> <ul style="list-style-type: none"> delete reference in the Activity Description to "minor" 	<p>Accept in kind</p> <p>Officers recommend granting the relief sought by the submitter.</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		<ul style="list-style-type: none"> include the Port coastal management area to this rule. 	<p>Officers recommend that Rules relating to maintenance, alterations, extensions and removal be reframed to more clearly differentiate between the respective activities based upon changes in their areal extent or 'footprint'. Consequential changes are proposed to Rule 35 to limit the rule to maintenance activities only. As part of that recommendation, alterations to the structure will be addressed in other rules (therefore all references to alterations are deleted) and the rule has been extended to include the Port coastal management area.</p> <p>Officers note that consequential amendments are also recommended to the Plan definitions including amending the existing definition for "maintenance" and introducing new definitions for "alteration" and "extension".</p>
47 – Fonterra	954	Support	Accept
		Retain Rule 35 of the Plan as notified.	Support noted.
59 – KiwiRail	955	Support	Accept
		Retain Rule 35 of the Plan as notified.	Support noted.
61 – Te Rūnanga o Ngāti Ruanui Trust	956	Amend	Accept in part
		<p>Submitter seeks amendment to the standards, terms and conditions of Rule 35 of the Plan to read:</p> <p>[...]</p> <p><i>(ca) 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;</i></p> <p><i>(cb) the activity does not have adverse effect on Schedules 1 and 2</i></p> <p><i>(c) for structures <u>and culturally significant areas</u> identified in Schedule 5 [Cultural and Historic heritage];</i></p> <p>[...]</p> <p><i>(e) the extent of disturbance of the foreshore and seabed is limited to the minimum required to undertake the activity; <u>and does not adversely affect continued customary use within the area;</u></i></p> <p>[...]</p> <p><i>(g) 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]; <u>and taonga</u></i></p>	<p>Officers note that Rule 35 is providing for the ongoing maintenance, repair or minor alterations to already existing lawfully established structures in the coastal marine area. Subject to compliance with the standards, terms and conditions of the Rule, any adverse effects should be less than minor.</p> <p>The erection and placement of new structures are addressed in separate rules. Specific comments on the new and amended proposed conditions are as follows:</p> <ul style="list-style-type: none"> relief sought in relation to Condition (ca) is unnecessary and uncertain for Plan users. The Rule is only providing for maintenance, repair or minor alterations to structures already existing in the coastal marine area. Officers note that impacts on cultural sites of significance are already addressed in Condition (c). The effect of granting this relief would be to make this rule redundant as it requires no adverse effects (including less than minor). It would impact and impinge on cultural sites of significance noting that tauranga waka sites are also structures. decline the relief sought in relation to Condition (cb). Officers note that the effect of granting this relief would also make this rule redundant as it again requires no adverse effects (including less than minor) across the

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		<u>species protected under Taranaki iwi Deed of Settlement including those identified in Schedule 4C [Taonga species and habitat] [...]</u> .	<p>whole coastal marine area, noting that Schedules 1 and 2 capture the whole coastal marine area plus landward parts of the coastal environment identified as having outstanding natural character or being an outstanding natural feature or landscape</p> <ul style="list-style-type: none"> • decline the relief sought in relation to Condition (c). Officers refer the submitter to previous comments made on expanding the scope of historic heritage • reliefs sought in relation to Condition (e) are unnecessary. Such matters should already be addressed in Condition (c) of the Rule, which protects customary sites of significance. However, it is noted that any impacts on receiving water quality will be temporary and unlikely to be noticeable in natural prevailing conditions • grant the relief in kind in relation to Condition (g). Officers recommend expanding the scope of Rule conditions to include reference to scheduled taonga species.
Rule 36 – Maintenance repair, alteration, extension, or removal and replacement of existing lawfully established structures			
29 – Department of Conservation	957	Support Retain Rule 36 of the Plan as notified.	Accept Support noted.
Further submissions – Fonterra (47)		Support	
32 – Port Taranaki	958	Amend Submitter seeks amendment to Rule 36 of the Plan to provide for repair, alteration, extension or removal and replacement of existing lawfully established hard protection structures within the Port coastal management area as a Controlled Activity (rather than a Discretionary Activity) and provide a non-notification clause.	Decline Officers recommend declining the relief sought by the submitter. Officers note that Rule 36 is an existing rule in the current Plan. Further, in accordance with the <i>New Zealand Coastal Policy Statement</i> and the policies of this Plan (particularly Policy 34), there is an expectation that hard protection structures will be discouraged and the use of alternatives promoted. This expectation is unlikely to be realised as a Controlled Activity.
43 – Royal Forest and Bird Protection Society	959	Amend Submitter seeks amendment to Activity Description of Rule 36 of the Plan to read: <i>Existing lawfully established hard protection structure <u>maintenance repair, minor alteration, extension or removal and replacement [...]</u></i>	Accept in part Officers recommend granting the relief sought by the submitter in part. Officers recommend that Rules relating to maintenance, alterations, extensions and removal be reframed to more clearly differentiate between the respective

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
			activities based upon changes in their areal extent or 'footprint'. Consequential changes are proposed to Rule 36 to limit the rule to alteration and extension of hard protection structures in the coastal marine area. As part of that recommendation, all references to repair has been deleted. Officers recognise that both the maintenance and alteration of structures in the coastal marine area may involve repairs.
59 – KiwiRail	960	<p>Amend</p> <p>Submitter seeks amendment to Rule 36 of the Plan to provide for repair of hard protection structures as a Permitted Activity (rather than a Discretionary Activity)</p> <p>OR</p> <p>Amend Rule 35 to allow hard protection structures to be maintained, repaired or have minor alterations.</p>	<p>No relief necessary</p> <p>Officers recommend that Rules relating to maintenance, alterations, extensions and removal be reframed to more clearly differentiate between the respective activities based upon changes in their areal extent or 'footprint'.</p> <p>Officers note that Rule 35 already provides for the maintenance of hard protection and other structures as a Permitted Activity, subject to compliance with the standards, terms and conditions.</p>
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Oppose	Consequential changes are proposed to Rule 36 to limit the rule to alteration and extension of hard protection structures in the coastal marine area. Rule 36 addresses those structures involving works that are more than just maintenance and for which should be considered as a Discretionary Activity. Officers note that the heading above Rule 36 is misleading and recommend it be amended.
61 – Te Rūnanga o Ngāti Ruanui Trust	961	<p>Amend</p> <p>Submitter seeks amendment to the standards, terms and conditions of Rule 36 of the Plan to read:</p> <p><i><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></i></p> <p><i><u>(b) repair, alteration, extension or removal of structure and discharge complies with tangata whenua indicators referred to in the tangata whenua monitoring plan</u></i></p> <p><i><u>(c) repair, alteration, extension or removal of structure and discharge is consistent with iwi management plan.</u></i></p> <p>AND</p> <p>Include the following notification note:</p> <p><i><u>Resource consent applications under this Rule will be notified to tangata whenua.</u></i></p>	<p>Decline</p> <p>The submitter has sought the inclusion of standards, terms and conditions for rules in the Plan relating to Discretionary and Non-complying Activities.</p> <p>Officers decline the relief noting that it is not standard planning practice for Discretionary Activity or Non-complying Activity rules to include standards, terms and conditions. Conditions relating to a Non-complying Activity are developed on a case-by-case basis through the consenting process having regard to the relevant Plan policies.</p> <p>Officers note that all matters identified by the submitter would be considered through the consenting process with Policies 1 to 21, 22, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 44, 45, 46 and 49 being given effect to.</p> <p>In relation to notification requirements proposed by the submitter, Officers note that the Plan is not intended to provide the operational detail for implementing every aspect of the Plan. Such detail is more appropriately included in the Council's standard operating procedures and/or any Mana Whakahono a Rohe agreements.</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Rule 37 – Existing lawfully established network structures			
15 – Surfbreak Protection Society	962	<p>Other</p> <p>Submitter seeks 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.</p>	<p>No relief necessary</p> <p>Submitter's comments are noted and have been previously addressed in submission point 446 relating to surfing policies. Policy 19 would be considered as part of any resource consent application under this Rule.</p> <p>Officers note that matters relating to affected and interested party status and limited notification are addressed separately in accordance with the Council's consenting standard operating procedures.</p>
26 – Transpower NZ Ltd	963	<p>Amend</p> <p>Submitter seeks amendment to Rule 37 of the Plan to delete reference to National Environmental Standards for Electricity Transmission Activities: [...] or the Resource Management (National Environmental Standards for Electricity Transmission Activities Regulations 2009 (Appendix 6))</p>	<p>Accept</p> <p>The reference to the <i>National Environmental Standards for Electricity Transmission</i> is redundant and does not add further value to the Plan. Officers recommend granting the relief sought by the submitter.</p>
29 – Department of Conservation	964	<p>Amend</p> <p>Submitter seeks amendment to Rule 37 of the Plan to include a provision about limiting the size of any extension of the structure.</p>	<p>Decline</p> <p>Officers recommend declining the relief sought by the submitter noting that such matters can be more properly considered as part of the consenting process. Officers note that the revised Plan defines key terms relating to "maintenance", "and alteration" and that the Rule has reserved control over the design, construction, maintenance and decommissioning of the structure plus the management of adverse effects.</p>
Further submissions – Climate Justice Taranaki Inc (21), Te Rūnanga o Ngāti Mutunga (40), Te Atiawa (58)		Support	
Further submissions – Powerco (45), Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd (46)		Oppose	
30 – First Gas Ltd	965	<p>Amend</p> <p>Submitter seeks amendment to Rule 37 of the Plan to make network utility pipeline repair, alteration or extension a Permitted Activity (rather than a Non-complying Activity)</p> <p>AND</p> <p>Extend the Rule to include Outstanding Value coastal management areas.</p>	<p>Decline</p> <p>Officers recommend declining the relief sought by the submitters. The merits of providing for the alteration and extension of utility structures need to be carefully considered in relation to potential adverse effects on areas identified as having outstanding (exceptional) natural character, features and landscapes. Such matters need to be considered on a case-by-case basis as a Non-complying</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Further submissions – Te Rūnanga o Ngāti Mutunga (40), Te Atiawa (58), Te Rūnanga o Ngāti Ruanui Trust (61)		Oppose	Activity rather than a Controlled Activity whereby the consent would always be allowed.
Further submissions – Powerco (45), Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd (46)		Support in part	Officers further note that Rules relating to maintenance, alterations, extensions and removal are recommended to be reframed to more clearly differentiate between the respective activities based upon changes in their areal extent or 'footprint'. Under this framework maintenance of network utilities in the coastal marine area are already a Permitted Activity. However, officers believe it is appropriate that alterations and extensions of network utility and the avoidance, remedying or mitigation of adverse effects be subject to a consenting process.
41 – Te Korowai o Ngāruahine Trust	966	Amend	Accept
		Submitter seeks amendment to Condition (c) of Rule 37 of the Plan to read: [...] <i>(c) the activity does not have an adverse effect on the values associated with historic heritage identified in Schedule 5A and B [Historic heritage]; [...]</i>	Officers recommend granting the relief sought by the submitter.
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Support	
43 – Royal Forest and Bird Protection Society	967	Amend	Accept in part
		Submitter seeks amendment to the Activity Description of Rule 37 of the Plan to read: <i>Lawfully established hard protection structure maintenance repair, minor alteration, extension or removal and replacement [...]</i>	Officers recommend granting the relief sought by the submitter in part. Officers recommend that rules relating to maintenance, alterations, extensions and removal be reframed to more clearly differentiate between the respective activities based upon changes in their areal extent or 'footprint'. Consequential changes are proposed to Rule 37 to limit the rule to alteration and extension of network utility structures in the coastal marine area. As part of that recommendation, all references to repair have been deleted. Officers recognise that both the maintenance and alteration of structures in the coastal marine area may involve repairs.
Further submissions – Climate Justice Taranaki Inc (21)		Support	
45 – Powerco	968	Amend	Accept in part
		Submitter seeks amendment to Rule 37 of the Plan to read: <i>Lawfully established network utility structure <u>maintenance</u>, repair, alteration or extension where the structure is:</i> <i>(a) a pipeline that is buried or attached to a bridge or access structure;</i>	Officers recommend granting the relief sought in relation to amending the Activity Description (d). Officers further note that reference to Rule 35 has also been deleted. Officers recommend that Rules relating to maintenance, alterations, extensions and

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		<p>[...]</p> <p>(d) a communication or electricity cable that is buried or attached to a bridge or access structure or pole; or</p> <p>[...]</p> <p>(d) discharge of sediment</p> <p>and does not come within or comply with Rule 35 [...]</p>	<p>removal be reframed to more clearly differentiate between the respective activities based upon changes in their areal extent or 'footprint'.</p> <p>Officers note that Rule 35 already provides for the maintenance of network and other structures as a Permitted Activity, subject to compliance with the standards, terms and conditions.</p> <p>Consequential changes are also proposed to Rule 37 to limit the rule to alteration and extension of network utility structures in the coastal marine area. Rule 37 addresses utility structures involving works that are more than just maintenance (in areas other than outstanding) and for which should be considered as a Controlled Activity.</p>
Further submissions – Port Taranaki Ltd (32)		Support	
46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	969	<p>Amend</p> <p>Submitter seeks amendment to Rule 37 of the Plan to read:</p> <p><i>Lawfully established network utility structure <u>maintenance</u>, repair, alteration or extension where the structure is:</i></p> <p>(a) a pipeline that is buried or attached to a bridge, <u>wharf</u> or access structure;</p> <p>[...]</p> <p>(h) discharge of sediment</p> <p>and does not come within or comply with Rule 35</p> <p>excluding activities regulated by the Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009 (Appendix 6).</p>	<p>Accept in part</p> <p>Officers recommend granting the relief sought in relation to amending the Activity Description (a).</p> <p>Officers further note that reference to Rule 35 has also been deleted. Officers recommend that Rules relating to maintenance, alterations, extensions and removal be reframed to more clearly differentiate between the respective activities based upon changes in their areal extent or 'footprint'.</p> <p>Officers note that Rule 35 already provides for the maintenance of network and other structures as a Permitted Activity, subject to compliance with the standards, terms and conditions.</p>
58 – Te Atiawa	970	<p>Amend</p> <p>Submitter seeks amendment to Rule 37 of the Plan to recognise Iwi notified as an affected party</p> <p>AND</p> <p>Change reference in the Conditions to Schedule 5 to Schedules 5A and 5B.</p>	<p>Accept in part</p> <p>Officers recommend granting the relief sought by the submitter in relation to amending Condition (c) to refer to Schedules 5A and 5B (rather than just Schedule 5). However, in relation to the notification requirements proposed by the submitter, officers note that the Plan is not intended to provide the operational detail for implementing every aspect of the Plan. Such detail is more appropriately included in the Council's standard operating procedures and/or any Mana Whakahohe a Rohe agreements.</p>
Further submissions – Te Rūnanga o Ngāti Mutunga (40), Te Rūnanga o Ngāti Ruanui Trust (61)		Support	<p>Notwithstanding the above, officers note that, as part of this Coastal Plan review process, and in relation to 'sites of significance' to Māori (refer Condition (c)), Council has already agreed to recognise iwi as an affected party for all resource consent applications. There will be further opportunity to set consultation</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
			requirements and expectations as part of the development of Mana Whakahono a Rohe agreements.
59 – KiwiRail	971	<p>Amend</p> <p>Submitter seeks amendment to Rule 37 of the Plan to remove the (a) to (e) Activity Descriptions on the type of network utility structure, OR Include existing railway assets as new (f).</p>	<p>No relief necessary</p> <p>Officers believe railway assets in the coastal marine area are already covered in Rule 37 whereby they are likely to be bridges or access structures, which are explicitly referred to in the Rule.</p>
61 – Te Rūnanga o Ngāti Ruanui Trust	972	<p>Amend</p> <p>Submitter seeks amendment to Rule 37 of the Plan to include new and amended standards, terms and conditions to read: [...] <i>(c) activity does not have an adverse effect on the values associated with <u>cultural and historic heritage identified in Schedule 5 [Cultural and Historic heritage];</u></i> <i>(ca) the activity does not have adverse effect on Schedules 1 and 2;</i> <i>(cb) 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;</i> <i>(d) the structure 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 Settlement including those identified in Schedule 4C [Taonga species and habitat]</i> <i>(e) activity does not adversely affect the matters/values identified for protection by mana whenua in the cultural impact assessment;</i> <i>(f) activity complies with tangata whenua indicators referred to in the tangata whenua monitoring plan</i> <i>(g) activity is consistent with iwi management plan.</i></p>	<p>Accept in part</p> <p>Officers note that Rule 37 is providing for the ongoing maintenance, repair or minor alterations to already existing lawfully established network utility structures in the coastal marine area. Subject to compliance with the standards, terms and conditions of the Rule, any adverse effects should be less than minor.</p> <p>The erection and placement of new structures are addressed in separate rules. Specific comments on the new and amended proposed conditions are as follows:</p> <ul style="list-style-type: none"> • decline the relief sought in relation to Condition (c). Officers refer the submitter to previous comments made on expanding the scope of historic heritage • decline the relief sought in relation to Condition (ca). Officers note that the effect of granting this relief would also make this rule redundant as it again requires no adverse effects (including less than minor) across the whole coastal marine area, noting that Schedules 1 and 2 capture the whole coastal marine area plus landward parts of the coastal environment identified as having outstanding natural character or being an outstanding natural feature or landscape • decline the relief sought in relation to Condition (cb) as unnecessary and uncertain for Plan users. The Rule is only providing for maintenance, repair or minor alterations to network utility structures already existing in the coastal marine area. Officers note that impacts on cultural sites of significance are already addressed in Condition (c). The effect of granting this relief would be to make this rule redundant as it requires no adverse effects (including less than minor).
Further submissions – Climate Justice Taranaki Inc (21), Te Korowai o Ngāruahine Trust (41), Te Atiawa (58)		Support	

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
			<ul style="list-style-type: none"> grant the relief in kind in relation to Condition (d). Officers recommend expanding the scope of Rule conditions to include reference to scheduled taonga species. reliefs sought in relation to Condition (e) are unnecessary. Such matters should already be addressed in Condition (c) of the Rule, which protects customary sites of significance. However, it is noted that any impacts on receiving water quality will be temporary and unlikely to be noticeable in natural prevailing conditions decline the relief sought in relation to Condition (f) and (g) as being uncertain in terms of their application and given the details as to managing effects on water quality and monitoring are already identified in the rule as matters of control.
61 – Te Rūnanga o Ngāti Ruanui Trust	973	<p>Amend</p> <p>Submitter seeks amendment to the Control and notification column for Rule 37 of the Plan to read:</p> <p><i>Control is reserved over:</i></p> <p>[...]</p> <p>(e) effects on water quality <i>and mauri values</i>;</p> <p>(f) effects on ecological values;</p> <p>(g) effects on historic, cultural and amenity values;</p> <p>(hi) effects on surf breaks;</p> <p>(i) effects of occupation on public access;</p> <p>(j) effects on navigation;</p> <p>(k) effects of noise and light;</p> <p><i>(l) effects on Cultural Zone (referred to in Spatial Plan)</i>;</p> <p>(m) monitoring <i>(including tangata whenua indicators referred to in the tangata whenua monitoring plan)</i> and information requirements;</p> <p>(n) duration of consent; and</p> <p>(o) review of consent conditions.</p> <p>Resource consent applications under this Rule will <i>not be publicly notified but may be limited notified be notified to tangata whenua.</i></p>	<p>Decline</p> <p>Officers recommend declining the relief sought by the submitter.</p> <p>The suggested changes seem to be mixing jurisdictional, policy and operational matters and introducing a level of specificity that is not considered appropriate or necessary. Most of the changes sought are a subset of matters that have already been provides for while the submitter has also introduced some new concepts such as a cultural zone and a spatial plan that do not fit within the Proposed Plan framework. There is also a 'requirement' to be consistent with iwi management plans, while the submitter is silent on how other planning documents might fit within this framework.</p> <p>Officers note that this activity is already subject to the General Policies 1 to 21 of which Policies 15 [Historic heritage] and 16 [Relationship of tangata whenua] are particularly relevant. Officers further note that there will be an opportunity to develop an agreed framework and operational detail for implementing the Plan as part of any Mana Whakahono a Rohe agreement with the submitter.</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Further submissions – Climate Justice Taranaki Inc (21)		Support	
Rule 38 – Existing lawfully established structure removal and replacement			
12 – Chorus New Zealand Limited	974	<p>Amend</p> <p>Submitter seeks amendment to the standards/terms/conditions of Rule 38 [Existing lawfully established structure removal and replacement] of the Plan to read:</p> <p>[...]</p> <p><i>(f) the replacement structure is built in the same <u>or similar location</u> 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, <u>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;</u></i></p> <p>OR</p> <p>the standards/terms/conditions are amended to read:</p> <p><i>(f) the replacement structure, <u>except for submarine cables or lines</u>, is built in the same location as the original structure. <u>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, <u>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;</u> [...]</i></p>	<p>Accept</p> <p>The submitter notes that telecommunications infrastructure need to be operational while being replaced therefore it would not be possible to replace the structure in the same location as required by Condition (f). Likewise, there are difficulties with Condition (g) in that complete removal of a structure does not necessarily give rise to reduced environmental effects.</p> <p>Officers recommend granting the relief sought by the submitter by amending Conditions (f) and (g) to read:</p> <p>[...]</p> <p><i>(f) the replacement structure, <u>except for submarine cables or lines</u>, is built in the same location as the original structure. <u>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, <u>unless the removal of the structure is considered by a Suitably Experienced and Qualified Coastal Professional, in collaboration with the Taranaki Regional Council, to have greater adverse effects on the environment than leaving it in place;</u> [...]</i></p>
Further submissions – Powerco (45)		Support in part	
13 – Spark New Zealand Trading Limited	975	<p>Amend</p> <p>Submitter seeks amendment to the standards/terms/conditions of Rule 38 [Existing lawfully established structure removal and replacement] of the Plan to read:</p> <p>[...]</p>	<p>Accept</p> <p>The submitter notes that telecommunications infrastructure need to be operational while being replaced therefore it would not be possible to replace the structure in the same location as required by Condition (f). Likewise, there are difficulties with</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		<p>(f) the replacement structure is built in the same <u>or similar location</u> as the original structure;</p> <p>(g) The existing structure is removed completely with no waste being placed into the coastal marine area, <u>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;</u></p> <p>OR</p> <p>the standards/terms/conditions are amended to read:</p> <p>(f) the replacement structure, <u>except for submarine cables or lines,</u> is built in the same location as the original structure. <u>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></p> <p>(g) the existing structure is removed completely with no waste being placed into the coastal marine area, <u>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: [...]</u></p>	<p>Condition (g) in that complete removal of a structure does not necessarily give rise to reduced environmental effects.</p> <p>Officers recommend granting the relief sought by the submitter by amending Conditions (f) and (g) to read:</p> <p>(f) the replacement structure, <u>except for submarine cables or lines,</u> is built in the same location as the original structure. <u>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></p> <p>(g) g) the existing structure is removed completely with no waste being placed into the coastal marine area, <u>unless the removal of the structure is considered by a Suitably Experienced and Qualified Coastal Professional, in collaboration with the Taranaki Regional Council to have greater adverse effects on the environment than leaving it in place; [...]</u></p>
Further submissions – Port Taranaki Ltd (32), Powerco (45)		Support in part	
14 – Vodafone New Zealand Limited	976	<p>Amend</p> <p>Submitter seeks amendment to Rule 38 [Existing lawfully established structure removal and replacement] of the Plan to include standards/terms/conditions to read:</p> <p>[...]</p> <p>(f) the replacement structure is built in the same <u>or similar location</u> as the original structure;</p> <p>(g) the existing structure is removed completely with no waste being placed into the coastal marine area, <u>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;</u></p> <p>OR</p>	<p>Accept</p> <p>The submitter notes that telecommunications infrastructure need to be operational while being replaced therefore it would not be possible to replace the structure in the same location as required by Condition (f). Likewise, there are difficulties with Condition (g) in that complete removal of a structure does not necessarily give rise to reduced environmental effects.</p> <p>Officers recommend granting the relief sought by the submitter by amending Conditions (f) and (g) to read:</p> <p>(f) the replacement structure, <u>except for submarine cables or lines,</u> is built in the same location as the original structure. <u>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></p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		<p>the standards/terms/conditions are amended to read:</p> <p>(f) the replacement structure, <u>except for submarine cables or lines</u>, is built in the same location as the original structure. <u>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></p> <p>(g) the existing structure is removed completely with no waste being placed into the coastal marine area, <u>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; [...]</u></p>	<p>(g) the existing structure is removed completely with no waste being placed into the coastal marine area, <u>unless the removal of the structure is considered by a Suitably Experienced and Qualified Coastal Professional, in collaboration with the Taranaki Regional Council, to have greater adverse effects on the environment than leaving it in place; [...]</u></p>
Further submissions – Powerco (45)		Support in part	
21 – Climate Justice Taranaki	977	<p>Amend</p> <p>Submitter seeks amendment to Rule 38 of the Plan to make the activity a Discretionary Activity (rather than Permitted Activity).</p>	<p>Decline</p> <p>Officers recommend declining the relief sought by the submitter as that subject to compliance with the standards, terms and conditions of Rule 38, any adverse effects arising from the removal or replacement of existing lawfully established structures in the coastal marine area should be less than minor.</p>
Further submissions – Te Rūnanga o Ngāti Mutunga (40), Te Korowai o Ngāruahine Trust (41), Te Atiawa (58)		Support	
26 – Transpower NZ Ltd	978	<p>Amend</p> <p>Submitter seeks amendment to Rule 38 of the Plan to delete reference to National Environmental Standards for Electricity Transmission Activities:</p> <p>[...] or the Resource Management (National Environmental Standards for Electricity Transmission Activities Regulations 2009 (Appendix 6)).</p>	<p>Accept</p> <p>The reference to the <i>National Environmental Standards for Electricity Transmission</i> is redundant and does not add further value to the Plan. Officers recommend granting the relief sought by the submitter.</p>
29 – Department of Conservation	979	<p>Amend</p> <p>Submitter seeks amendment to Rule 38 of the Plan to include new standards, terms and conditions addressing:</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) 	<p>Decline</p> <p>Officers recommend declining the relief sought by the submitter.</p> <p>Similar type conditions have been considered as part of the Plan review process and were not deemed to be not necessary. Most of the proposed conditions seem to relate to avoiding, remedying or mitigating adverse effects already addressed in Conditions (i) and (k). However, officers are concerned that the specificity sought</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		<ul style="list-style-type: none"> 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 and that methods should be employed to avoid any fuel spillage. 	by the submitter unnecessarily restricts the application of the rule and imposes operational constraints on those using it. For example the requirement to remove spoil within 24 hours.
Further submissions – Climate Justice Taranaki Inc (21)	Support		
Further submissions – Powerco (45), Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd (46)	Oppose		
30 – First Gas Ltd	980	<p>Amend</p> <p>Submitter seeks that network utility pipeline removal and replacement within coastal management areas: Outstanding Value and Estuaries Unmodified, Estuaries Modified and Port be classified as a Permitted Activity and be included under Rule 38 (or under a separate rule).</p>	<p>Decline</p> <p>Officers recommend declining the relief sought by the submitter.</p> <p>Officers note that Rules relating to maintenance, alterations, extensions and removal are recommended to be reframed to more clearly differentiate between the respective activities based upon changes in their areal extent or 'footprint'. Under this framework removal of network utilities in the coastal marine area are already a Permitted Activity subject to compliance with the standards terms and conditions.</p> <p>Officers note that the Activity Description of Rule 38 deliberately excludes petroleum production installations and pipelines because of the higher environmental risks involved. It is appropriate that the removal and replacement of such structures be considered by other rules as part of a consenting process.</p>
Further submissions – Te Rūnanga o Ngāti Mutunga (40), Te Atiawa (58)	Oppose		
Further submissions – Powerco (45)	Neutral		
40 – Te Rūnanga o Ngāti Mutunga	981	<p>Amend</p> <p>Submitter opposes permitting the removal or replacement of existing lawfully established structures in the coastal marine area and seek that such activities be a Discretionary Activity (rather than a Permitted Activity).</p>	<p>Decline</p> <p>Officers recommend declining the relief sought by the submitter as officers are satisfied that subject to compliance with the standards, terms and conditions of the Rule, adverse effects should be less than minor.</p>
41 – Te Korowai o Ngāruahine Trust	982	<p>Amend</p> <p>Submitter seeks amendment to Condition (i) of Rule 38 of the Plan to read: <i>(i) structure is not located within any historic heritage site identified in Schedule 5A and B [Historic heritage] or any other archaeological site; [...]</i></p>	<p>Accept</p> <p>Officers recommend granting the relief sought by the submitter.</p>
	983	<p>Amend</p>	<p>Decline</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
43 – Royal Forest and Bird Protection Society		<p>Submitter seeks amendment to Rule 38 of the Plan by:</p> <ul style="list-style-type: none"> deleting and excluding Outstanding Value coastal management areas from the rule deleting and excluding the “replacement” of lawfully established structures from the rule (and instead providing for the replacement of existing structures via rules for erection and placement of new structures <p>OR</p> <p>Alternatively provide for replacement of lawfully established structures as a Restricted Discretionary rule (rather than a Permitted Activity) and include matters for discretion that address: effects on natural character and natural features and landscapes; effects on indigenous biodiversity; generation of noise; location; and whether the replacement structure maintains the form of the original structure with no increase in length, width or height, or increase in adverse effects.</p>	<p>Officers recommend declining the relief sought by the submitter as officers are satisfied that, subject to compliance with the standards, terms and conditions of the Rule, adverse effects should be less than minor.</p> <p>In relation to excluding Outstanding Value coastal management areas it is noted that when considering whether there are any adverse effects on the characteristics and qualities of ‘outstanding areas’, it must be recognised that many areas contain ongoing use and development that was present when the areas were first identified as outstanding. Removal and replacement of structures in accordance with the standards, terms and conditions of the rules will have only minor and transitory effects at a landscape scale.</p>
Further submissions – Climate Justice Taranaki Inc (21)		Support	
47 – Fonterra	984	<p>Support</p> <p>Retain Rule 38 of the Plan as notified.</p>	<p>Accept</p> <p>Support noted.</p>
Further submissions – Port Taranaki Ltd (32)		Support in part	
61 – Te Rūnanga o Ngāti Ruanui Trust	985	<p>Amend</p> <p>Submitter seeking amendment to Rule 38 of the Plan to include new and amended standards, terms and conditions to read:</p> <p>[...]</p> <p><i>(i) structure is not located within cultural and historic heritage identified in Schedule 5 [Cultural and Historic heritage] or any other archaeological site;</i></p> <p><i>(ia) structure is not located within Schedules 1 and 2;</i></p> <p><i>(ib) structure does not adversely affect the suitability of the receiving area for customary use;</i></p>	<p>Accept in part</p> <p>Officers note that Rule 37 is providing for the removal and replacement of generally low risk structures in the coastal marine area. Subject to compliance with the standards, terms and conditions of the Rule, any adverse effects should be less than minor.</p> <p>The submitter is seeking amendment to Rule 38 of the Plan to include new and amended standards, terms and conditions. Specific comments on the new and amended proposed conditions are as follows:</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		<p><i>(ic) structure is not located within any site identified in 5B [Sites of significance to Māori and associated values] and Appendix 2;</i></p> <p><i>(j) structure is not located at any site identified in Schedules 5 [Sites of geological significance];</i></p> <p><i>(k) the structure 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 Settlement including those identified in Schedule 4C [Taonga species and habitat]. [...]</i></p>	<ul style="list-style-type: none"> • decline the relief sought in relation to Condition (i). Officers refer the submitter to previous comments made on expanding the scope of historic heritage • decline the relief sought in relation to Condition (ia). Officers note that the effect of granting this relief would also make this rule redundant as Schedules 1 and 2 capture the whole coastal marine area plus landward parts of the coastal environment identified as having outstanding natural character or being an outstanding natural feature or landscape • decline relief sought in relation to Condition (ib) as unnecessary and uncertain for Plan users. The Rule is only providing for the removal and replacement of structures already existing in the coastal marine area. Officers note that impacts on cultural sites of significance are already addressed in Condition (i) • reliefs sought in relation to Condition (ic) are unnecessary. Such matters should already be addressed in Condition (i) of the Rule, which protects customary sites of significance. However, it is noted that any impacts on receiving water quality or disturbances to the foreshore and seabed will be temporary and unlikely to be noticeable in natural prevailing conditions • grant the relief sought in (j) to delete references to sites of geological significance • grant the relief in kind in relation to Condition (k). Officers recommend expanding the scope of Rule conditions to include reference to scheduled taonga species.
Further submissions – Climate Justice Taranaki Inc (21), Te Rūnanga o Ngāti Mutunga (40), Te Korowai o Ngāruahine Trust (41), Te Atiawa (58)		Support	
NEW Rule 38A – Existing lawfully established structure removal and replacement in Outstanding Value areas			
43 – Royal Forest and Bird Protection Society	986	<p>Amend</p> <p>Submitter seeks amendment to the Plan to include a new Rule that would provide for the removal of existing lawfully established structures in Outstanding Value coastal management areas as Controlled Activity (rather than a Permitted Activity provided for in Rule 38).</p>	<p>Decline</p> <p>Officers note that Rule 38 relates to the removal and replacement of existing lawfully established structures in the coastal marine area. Officers do not believe it necessary to exclude Outstanding Value coastal management areas from Rule 38 (and create a separate Controlled Activity rule) noting that when considering whether there are any adverse effects on the characteristics and qualities of 'outstanding areas', it must be recognised that many areas contain ongoing use</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
			and development that was present when the areas were first identified as outstanding.
Rule 39 – Existing lawfully established Port structure maintenance and repair			
40 – Te Rūnanga o Ngāti Mutunga	987	<p>Amend</p> <p>Submitter seeks amendment to Rule 39 of the Plan to make the maintenance, repair or alteration of structures in the Port a Controlled Activity (rather than a Permitted Activity).</p>	<p>Decline</p> <p>Officers note that Rule 39 relates to the maintenance, repair or alteration of existing lawfully established structures in the Port. It is similar in kind to existing rules in the current Plan relating to the Port.</p> <p>Officers note that the Port is already a highly modified environment that provides a national and regionally important function whereby the movement of goods is dependent upon the ongoing maintenance, repair and alteration of Port structures. Subject to complying with the standards, terms and conditions that include that the structure does not increase beyond original size, in accordance with Policy 6 the Council seeks to provide for such activities. The Council sees no net environmental benefit to imposing consenting and compliance costs on the Port by making the activity a Controlled Activity.</p>
43 – Royal Forest and Bird Protection Society	988	<p>Amend</p> <p>Submitter seeks amendment to the Activity Description of Rule 39 of the Plan to read: <i>Existing lawfully established structure maintenance repair, or <u>minor</u> alteration where the activity [...]</i></p>	<p>Accept in part</p> <p>Officers recommend granting the relief sought by the submitter in part. Officers recommend that Rules relating to maintenance, alterations, extensions and removal be reframed to more clearly differentiate between the respective activities based upon changes in their areal extent or 'footprint'. Consequential changes are proposed to Rule 39 to limit the rule to alteration and extension of structures in the Port coastal management area. As part of that recommendation, all references to repair (and maintenance) has been deleted. Officers recognise that both the maintenance and alteration of structures in the coastal marine area may involve repairs. Officers see no need to include the word "<i>minor</i>" when Condition (a) already states that the size of the structure does not increase beyond its original size.</p>
46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	989	<p>Amend</p> <p>Submitter seeks amendment to the Activity Description of Rule 39 of the Plan to read: <i>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</i></p>	<p>Accept</p> <p>Officers recommend granting the relief sought to the submitter.</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		<i>water surface including any attached structures, and relates directly to port company operations and any associated: [...]</i>	
Further submissions – Port Taranaki Ltd (32)		Support	
58 – Te Atiawa	990	Support	Accept
		Retain Rule 39 of the Plan as notified.	Support noted.
Rule 40 – Existing lawfully established Port structure maintenance and repair			
40 – Te Rūnanga o Ngāti Mutunga	991	Amend Submitter seeks amendment to Rule 40 of the Plan to make the maintenance, repair or alteration of structures in the Port where it does not comply with Rule 39 a Discretionary Activity (rather than a Controlled Activity).	Decline Officers note that Rule 40 relates to the maintenance, repair or alteration of existing lawfully established structures in the Port where the activity does not come within or comply with Rule 39. As previously noted in submission point 987, the Port is already a highly modified environment that provides a national and regionally important function whereby the movement of goods is dependent upon the ongoing maintenance, repair and alteration of Port structures. Subject to complying with the standards, terms and conditions that include that the structure does not increase beyond original size and does not have adverse effects on significant indigenous biodiversity, it is recommended that the activity be allowed to get a resource consent as a Controlled Activity to provide some business certainty in accordance with Policy 6. The Council sees no net environmental benefit to reducing business certainty for the Port (in terms of whether a consent would be granted or not) by making the activity a Discretionary Activity.
43 – Royal Forest and Bird Protection Society	992	Amend Submitter seeks amendment to Rule 40 of the Plan by: <ul style="list-style-type: none"> including a new condition that the activity will not have adverse effects on the adjacent Outstanding Value area amending the matters for control to include consideration of effects on indigenous biodiversity and natural character. 	Accept in part Officers suggest that the current Rule conditions whereby the size of the structure does not increase from its original size and where the activity cannot impact on significant indigenous biodiversity (which includes not just within the Port but also the Sugar Loaf Islands) already address potential impacts on adjacent areas. Officers do not believe any change is necessary. With regards to amending the matters of control to explicitly address indigenous biodiversity and natural character, officers agree. Officers recommend replacing the term “ecological values” with “natural character, features and landscapes” and “indigenous biodiversity” to clarify its policy intent.

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	993	Support	Accept
		Retain Rule 40 of the Plan as notified.	Support noted.
Further submission – Port Taranaki Ltd (32)		Support	
58 – Te Atiawa	994	Support	Accept
		Retain Rule 40 of the Plan as notified.	Support noted.
Rule 41 – Existing lawfully established Port repair, alteration and extension			
15 – Surfbreak Protection Society	995	Other	No relief necessary
		Submitter seeks that there be no impact on surf breaks.	Submitter's comments are noted and have been previously addressed in submission point 446 relating to surfing policies. Policy 19 would be considered as part of any resource consent application under this Rule.
40 – Te Rūnanga o Ngāti Mutunga	996	Amend	Decline
		Submitter seeks amendment to Rule 41 of the Plan 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).	Officers note that Rule 39 relates to the alteration or extension of existing lawfully established structures in the Port (with some exceptions). It is similar in kind to existing rules in the current Plan relating to the Port.
Further submission – Port Taranaki Ltd (32)		Oppose	Officers note that the Port is already a highly modified environment that provides a national and regionally important function whereby the movement of goods is dependent upon the ongoing maintenance, repair and alteration of Port structures. Subject to complying with the standards, terms and conditions, in accordance with Policy 6 the Council seeks to provide for such activities. The Council sees no net environmental benefit to reducing business certainty for the Port (by the potential of declining a resource consent application) by making the activity a Discretionary Activity.
58 – Te Atiawa	997	Amend	Decline
		Submitter seeks amendment to Rule 41 of the Plan to notify Iwi as an affected party.	Officers note that the Plan is not intended to provide the operational detail for implementing every aspect of the Plan. Such detail is more appropriately included in the Council's standard operating procedures and or Mana Whakahoŋo a Rohe agreements.

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
			Notwithstanding the above, officers note that, as part of this Coastal Plan review process, and in relation to 'sites of significance' to Māori (refer Condition (b)), Council has already agreed to recognise iwi as an affected party for all resource consent applications. There will be further opportunity to set consultation requirements and expectations as part of the development of Mana Whakahono a Rohe agreements.
Rule 42 – Other structure repair, extension, removal or replacement			
6 – Trans-Tasman Resources Ltd	998	Support Retain Rule 42 of the Plan as notified.	Accept Support noted.
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Oppose	
26 – Transpower NZ Ltd	999	Amend Submitter seeks amendment to Rule 42 of the Plan to delete reference to National Environmental Standards for Electricity Transmission Activities: <i>[...] or the Resource Management (National Environmental Standards for Electricity Transmission Activities Regulations 2009 (Appendix 6)).</i>	Accept The reference to the <i>National Environmental Standards for Electricity Transmission</i> is redundant and does not add further value to the Plan. Officers recommend granting the relief sought by the submitter.
32 – Port Taranaki	1000	Amend Submitter seeks amendment to Rule 42 of the Plan to: <ul style="list-style-type: none"> 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 make any consequential amendments to other rules and objectives and policies to give effect to this relief OR <ul style="list-style-type: none"> provide another rule structure or amendment/additional rules to Rules 35-41 that delivers the same result for the port. 	Decline Officers recommend declining the relief sought by the submitter. Officers note that this Rule is an existing rule in the current Plan. Further, in accordance with the <i>New Zealand Coastal Policy Statement</i> and the policies of this Plan (particularly Policy 34), there is an expectation that hard protection structures will be discouraged and the use of alternatives promoted. This expectation is unlikely to be realised as a Controlled Activity.
Further submissions – Port Taranaki Ltd (32), Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd (46)		Support	

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
45 – Powerco	1001	Support Retain Rule 42 of the Plan as notified.	Accept Support noted.
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Oppose	
46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	1002	Support Retain Rule 42 of the Plan as notified.	Accept Support noted.
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Oppose	
47 – Fonterra	1003	Support Retain Rule 42 of the Plan as notified.	Accept Support noted.
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Oppose	
61 – Te Rūnanga o Ngāti Ruanui Trust	1004	Amend Submitter seeks amendment to Rule 42 of the Plan to include standards, terms and conditions to read: <i><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></i> <i><u>(b) repair, alteration, extension or removal of structure and discharge complies with tangata whenua indicators referred to in the tangata whenua monitoring plan</u></i> <i><u>(c) repair, alteration, extension or removal of structure and discharge is consistent with iwi management plan.</u></i> AND Include the following notification note: <i><u>Resource consent applications under this Rule will be notified to tangata whenua.</u></i>	Decline The submitter has sought the inclusion of standards/terms/conditions for rules in the Plan relating to discretionary and non-complying activities. Officers decline the relief noting that it is not standard planning practice for Discretionary Activity or Non-complying Activity rules to include standards, terms and conditions. Conditions relating to a Non-complying Activity are developed on a case by case basis through the consenting process having regard to the relevant Plan policies. Officers note that all matters identified by the submitter would be considered through the consenting process with Policies 1 to 21, 36, 37 and 38 being given effect to. In relation to notification requirements proposed by the submitter, officers note that the Plan is not intended to provide the operational detail for implementing every aspect of the Plan. Such detail is more appropriately included in the Council's standard operating procedures and/or any Mana Whakahono a Rohe agreements.
Further submissions – Trans-Tasman Resources (6)		Oppose	

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Further submissions – Te Rūnanga o Ngāti Mutunga (40), Te Korowai o Ngāruahine Trust (41), Te Atiawa (58)		Support	
Rule 43 – Other structure repair, extension, removal or replacement			
6 – Trans-Tasman Resources Ltd	1005	Support Retain Rule 43 of the Plan as notified.	Accept Support noted.
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Oppose	
26 – Transpower NZ Ltd	1006	Amend Submitter seeks amendment to Rule 43 of the Plan to delete reference to the <i>National Environmental Standards for Electricity Transmission Activities</i> : <i>[...] or the Resource Management (National Environmental Standards for Electricity Transmission Activities Regulations 2009 (Appendix 6)).</i>	Accept The reference to the <i>National Environmental Standards for Electricity Transmission</i> is redundant and does not add further value to the Plan. Officers recommend granting the relief sought by the submitter.
43 – Royal Forest and Bird Protection Society	1007	Support Retain the Non-complying classification for Rule 43 of the Plan.	Accept Support noted.
45 – Powerco	1008	Support Retain Rule 43 of the Plan as notified.	Accept Support noted.
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Oppose	
61 – Te Rūnanga o Ngāti Ruanui Trust	1009	Amend Submitter seeks amendment to the standards, terms and conditions of Rule 43 of the Plan to read: <i>(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;</i>	Decline The submitter has sought the inclusion of standards/terms/conditions for rules in the Plan relating to Discretionary and Non-complying Activities. Officers decline the relief noting that it is not standard planning practice for Discretionary Activity or Non-complying Activity rules to include standards, terms and conditions. Conditions relating to a Non-complying Activity are developed on a

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		<p><i>(b) repair, alteration, extension or removal of structure and discharge complies with tangata whenua indicators referred to in the tangata whenua monitoring plan</i></p> <p><i>(c) repair, alteration, extension or removal of structure and discharge is consistent with iwi management plan.</i></p> <p>AND</p> <p>Include the following notification note:</p> <p><i>Resource consent applications under this Rule will be notified to tangata whenua.</i></p>	<p>case-by-case basis through the consenting process having regard to the relevant Plan policies.</p> <p>Officers note that all matters identified by the submitter would be considered through the consenting process with Policies 1 to 21, 36, 37 and 38 being given effect to.</p> <p>In relation to notification requirements proposed by the submitter, officers note that the Plan is not intended to provide the operational detail for implementing every aspect of the Plan. Such detail is more appropriately included in the Council's standard operating procedures and or Mana Whakahono a Rohe agreements.</p>
Further submissions – Trans-Tasman Resources (6)		Oppose	
Further submissions – Te Rūnanga o Ngāti Mutunga (40), Te Korowai o Ngāruahine Trust (41), Te Atiawa (58)		Support	
Rule 44 – Structure removal or demolition			
6 – Trans-Tasman Resources Ltd	1010	<p>Support</p> <p>Retain Rule 44 of the Plan as this rule appropriately recognises the benefits of enabling removal of structures as a permitted activity from the coastal marine area when they are no longer required.</p>	<p>Accept</p> <p>Support noted.</p>
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Oppose	
26 – Transpower NZ Ltd	1011	<p>Amend</p> <p>Submitter seeks amendment to Rule 44 of the Plan to delete reference to the <i>National Environmental Standards for Electricity Transmission Activities</i>: <i>[...] or the Resource Management (National Environmental Standards for Electricity Transmission Activities Regulations 2009 (Appendix 6))</i></p>	<p>Accept</p> <p>The reference to the <i>National Environmental Standards for Electricity Transmission</i> is redundant and does not add further value to the Plan. Officers recommend granting the relief sought by the submitter.</p>
29 – Department of Conservation	1012	<p>Amend</p> <p>Submitter seeks amendment to Rule 44 of the Plan to include new conditions addressing:</p>	<p>Decline</p> <p>Officers recommend declining the relief sought.</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		<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 and that methods should be employed to avoid any fuel spillage. 	Similar type conditions have been considered as part of the Plan review process and were deemed to be not necessary. Most of the proposed conditions seem to relate to avoiding, remedying or mitigating adverse effects already addressed in Conditions (e) and (f). However, officers are concerned that the specificity sought by the submitter unnecessarily restricts the application of the Rule and imposes operational constraints on those using it. For example, the requirement to remove spoil within 24 hours.
Further submissions – Powerco (45), Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd (46)		Oppose	
41 – Te Korowai o Ngāruahine Trust	1013	Amend Submitter seeks amendment to Rule 44 of the Plan to require notification to iwi of any structure removal or demolition work in the coastal marine area.	Decline In relation to notification requirements proposed by the submitter, officers note that the Plan is not intended to provide the operational detail for implementing every aspect of the Plan. Such detail is more appropriately included in the Council's standard operating procedures and/or any Mana Whakahono a Rohe agreements.
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Support	
43 – Royal Forest and Bird Protection Society	1014	Support Retain Rule 44 of the Plan as notified.	Accept Support noted.
Further submissions – Port Taranaki Ltd (32)		Support	
46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	1015	Support Retain Rule 44 of the Plan as notified.	Accept Support noted.
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Oppose	
58 – Te Atiawa	1016	Amend Submitter seeks amendment to Rule 44 of the Plan by changing the Activity Classification to Controlled Activity (rather than a Permitted Activity).	Decline Officers note that Rule 44 relates to the removal or demolition of a structure in the coastal marine area not involving the use of explosives (with some exceptions).

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
			<p>Officers do not consider it appropriate to require a consent to remove or demolish a structure in the coastal marine area. Officers note that the removal of structures in the coastal marine area is generally a positive environmental outcome that contributes to the enhancement of natural character plus other values. Potential adverse effects are addressed in the standards, terms and conditions. They include a condition that the Council be notified of the activity at least five working days before commencing the activity so that the Council can assess and confirm that any adverse effects arising from the activity are acceptable.</p> <p>Council seeks to provide for such activities. The Council sees no net environmental benefit to imposing consenting and compliance costs on the Port by making the activity a Controlled Activity.</p>
61 – Te Rūnanga o Ngāti Ruanui Trust	1017	<p>Amend</p> <p>Submitter seeks amendment to Rule 44 of the Plan to include new and amended standards, terms and conditions to read:</p> <p>[...]</p> <p><i>(e) activity is not located within <u>cultural and</u> historic heritage identified in Schedule 5 <u>[Cultural and Historic heritage]</u> or any other archaeological site;</i></p> <p><i><u>(ea) activity is not located within Schedules 1 and 2;</u></i></p> <p><i><u>(eb) 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></i></p> <p><i><u>(ec) activity does not adversely affect the suitability of the receiving area for customary use;</u></i></p> <p><i>(f) the 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]; <u>and taonga species protected under Taranaki iwi Deed of Settlement including those identified in Schedule 4C [Taonga species and habitat].</u> [...]</i></p>	<p>Accept in part</p> <p>Officers note that Rule 44 relates to the removal or demolition of a structure in the coastal marine area not involving the use of explosives (with some exceptions). The submitter is seeking amendment to Rule 44 of the Plan to include new and amended standards, terms and conditions. Specific comments on the new and amended proposed conditions are as follows:</p> <ul style="list-style-type: none"> • decline the relief sought in relation to Condition (e). Officers refer the submitter to previous comments made on expanding the scope of historic heritage • decline the relief sought in relation to Condition (ea). Officers note that the effect of granting this relief would also make this rule redundant as Schedules 1 and 2 capture the whole coastal marine area plus landward parts of the coastal environment identified as having outstanding natural character or being an outstanding natural feature or landscape • decline relief sought in relation to Condition (eb) as unnecessary and uncertain for Plan users. The Rule is only providing for the removal and replacement of structures already existing in the coastal marine area. Officers note that impacts on cultural sites of significance are already addressed in Condition (e). • reliefs sought in relation to Condition (ec) are unnecessary. Such matters should already be addressed in Condition (i) of the Rule, which protects customary sites of significance. However, it is noted that any impacts on receiving water quality or disturbances to the foreshore and
Further submissions – Te Korowai o Ngāruahine Trust (41), Te Atiawa (58)		Support	

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
			<p>seabed will be temporary and unlikely to be noticeable in natural prevailing conditions</p> <ul style="list-style-type: none"> grant the relief in kind in relation to Condition (f). Officers recommend expanding the scope of Rule conditions to include reference to scheduled taonga species.
Rule 45 – Structure removal or demolition			
26 – Transpower NZ Ltd	1018	Amend	Accept
		Submitter seeks amendment to Rule 45 of the Plan to delete reference to the <i>National Environmental Standards for Electricity Transmission Activities: [...] or the Resource Management (National Environmental Standards for Electricity Transmission Activities Regulations 2009 (Appendix 6))</i> .	The reference to the <i>National Environmental Standards for Electricity Transmission</i> is redundant and does not add further value to the Plan. Officers recommend granting the relief sought by the submitter.
29 – Department of Conservation	1019	Amend	Accept
		Submitter seeks amendment to Rule 45 of the Plan to read: <i>[...] and the activity does not comply with Rule 45 44 [...]</i> .	Officers recommend granting the relief sought by the submitter.
32 – Port Taranaki	1020	Amend	Accept
		Submitter seeks amendment to Rule 45 of the Plan to read <i>[...] and the activity does not comply with Rule 45 44 [...]</i> .	Officers recommend granting the relief sought by the submitter.
43 – Royal Forest and Bird Protection Society	1021	Amend	Grant in kind
		Submitter seeks amendment to Rule 45 of the Plan to delete and exclude the Outstanding Value, Estuary Unmodified and Estuary Modified coastal management areas from the Rule.	<p>Officers note that Rule 45 relates to the removal or demolition of a structure in the coastal marine area (with some exceptions). However, it does allow the use of explosives.</p> <p>Officers do not consider it appropriate to make the removal or demolition of a structure in Outstanding Value, Estuary Unmodified and Estuary Modified coastal management areas a Discretionary or Non-complying Activity (for which a resource consent might be refused). Officers note that the removal of structures in the coastal marine area is generally a positive environmental outcome that contributes to the enhancement of natural character plus other values. It is particularly positive in the aforementioned areas where people might be seeking the enhancement or restoration of natural values.</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
			The submitter is concerned about the effects of using explosives on indigenous marine species noting that this may not be appropriate in all cases. Officers agree but recommend an alternative relief involving the inclusion of a new condition addressing adverse effects on significant indigenous biodiversity. Such matters can then be considered through the resource consents and may result in limitations in location, method, and timing of works.
46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	1022	Support	Accept
		Retain Rule 45 of the Plan as notified.	Support noted.
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Oppose	
58 – Te Atiawa	1023	Amend	Accept in kind
		Submitter seeks amendment to Rule 45 of the Plan by changing the Activity Classification to Discretionary Activity (rather than a Controlled Activity).	Officers note that Rule 45 relates to the removal or demolition of a structure in the coastal marine area (with some exceptions).
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Support	Officers do not consider it appropriate to make the removal or demolition of a structure in the coastal marine area a Discretionary or Non-complying Activity (for which a resource consent might be refused). Officers note that the removal of structures in the coastal marine area is generally a positive environmental outcome that contributes to the enhancement of natural character plus other values. However, the submitter is concerned about the effects of using explosives on sites of significant ecological value and historic heritage and suggest as a Discretionary Activity they can be involved in the decision making process and there will be consent monitoring. Officers note that, as part of this Coastal Plan review process, and in relation to 'sites of significance' to Māori (refer Condition (a)), Council has already agreed to recognise iwi as an affected party for all resource consent applications having an impact on scheduled sites of significance. There will be further opportunity to set consultation requirements and expectations as part of the development of Mana Whakahono a Rohe agreements. Officers further note that as a Controlled Activity, one of its matters of control include information and monitoring requirements. Notwithstanding the above, officers recommend an alternative relief involving the inclusion of a new condition addressing adverse effects on significant indigenous biodiversity (as well as historic heritage). Such matters can then be considered

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
			through the resource consents and may result in limitations in location, method, and timing of works or impose requirements to notify and consult.
61 – Te Rūnanga o Ngāti Ruanui Trust	1024	<p>Amend</p> <p>Submitter seeks amendment to Rule 45 of the Plan to include new and amended standards/terms/conditions to read:</p> <p>[...]</p> <p><i>(a) activity is not located within <u>cultural and</u> historic heritage identified in Schedule 5 [<u>Cultural and</u> Historic heritage] or any other archaeological site;</i></p> <p><i>(b) activity is not located within Schedules 1 and 2;</i></p> <p><i>(c) activity does not adversely affect the suitability of the receiving area for <u>customary use</u>;</i></p> <p><i>(d) the 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 Settlement including those identified in Schedule 4C [Taonga species and habitat];</i></p> <p><i>(e) 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;</i></p> <p><i>(f) activity does not adversely affect the matters/values identified for protection by <u>mana whenua in the cultural impact assessment</u>;</i></p> <p><i>(g) activity complies with <u>taonga whenua indicators referred to in the taonga whenua monitoring plan</u></i></p> <p><i>(h) activity is consistent with <u>iwi management plan</u>.</i></p>	<p>Accept in part</p> <p>The submitter is seeking amendment to Rule 45 of the Plan to include new and amended standards, terms and conditions. Specific comments on the new and amended proposed conditions are as follows:</p> <ul style="list-style-type: none"> decline the relief sought in relation to Condition (a). Officers refer the submitter to previous comments made on expanding the scope of historic heritage decline the relief sought in relation to Condition (b). Officers note that the effect of granting this relief would also make this rule redundant as Schedules 1 and 2 capture the whole coastal marine area plus landward parts of the coastal environment identified as having outstanding natural character or being an outstanding natural feature or landscape decline relief sought in relation to Condition (c) and (e) as unnecessary and uncertain for Plan users. The Rule is only providing for the removal and replacement of structures already existing in the coastal marine area. Officers note that impacts on cultural sites of significance are already addressed in Condition (a) grant the relief in kind in relation to Condition (d). Officers recommend expanding the scope of Rule conditions to include reference to scheduled taonga species decline the relief sought in relation to Condition (f), (g) and (h) as being uncertain in terms of their application and given the details as to managing effects on water quality and monitoring are already identified in the rule as matters of control.
Further submissions – Te Rūnanga o Ngāti Mutunga (40), Te Korowai o Ngāruahine Trust (41), Te Atiawa (58)		Support	
	1025	Amend	Decline

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
61 – Te Rūnanga o Ngāti Ruanui Trust		<p>Submitter seeks amendment to the Control/notification column for Rule 45 of the Plan to read:</p> <p><i>Control is reserved over:</i></p> <p>[...]</p> <p>(d) effects on water quality <i>and mauri values</i>;</p> <p>(e) effects on ecological values;</p> <p>(f) effects on historic, cultural and amenity values;</p> <p>(g) effects on surf breaks;</p> <p>(h) effects of occupation on public access;</p> <p>(i) effects on navigation;</p> <p>(j) effects of noise and light;</p> <p><i>(k) effects on Cultural Zone (referred to in Spatial Plan);</i></p> <p><i>(l) monitoring (including tangata whenua indicators referred to in the tangata whenua monitoring plan) and information requirements;</i></p> <p>(m) duration of consent; and</p> <p>(n) review of consent conditions.</p> <p>Resource consent applications under this Rule will not be publicly notified but may be limited notified <i>be notified to tangata whenua.</i></p>	<p>The suggested changes seem to be mixing jurisdictional, policy and operational matters and introducing a level of specificity that is not considered appropriate or necessary. Most of the changes sought are a subset of matters that have already been provided for while the submitter has also introduced some new concepts such as a cultural zone and a spatial plan that do not fit within the Proposed Plan framework. There is a 'requirement' to be consistent with iwi management plans, while the submitter is silent on how other planning documents might fit within this framework.</p> <p>Officers note that this activity is already subject to the General Policies 1 to 21 of which Policies 15 [Historic heritage] and 16 [relationship of tangata whenua] are particularly relevant. Officers further note that there will be an opportunity to develop an agreed framework and operational detail for implementing the Plan as part of any Mana Whakahoā a Rohe agreement with the submitter.</p>
Further submissions – Te Rūnanga o Ngāti Mutunga (40), Te Korowai o Ngāruahine Trust (41), Te Atiawa (58)		Support	
Rule 45A – Structure removal or demolition			
43 – Royal Forest and Bird Protection Society	1026	<p>Amend</p> <p>Submitter seeks amendment to Plan to include a new Rule that would provide for the removal or demolition of structures in the Outstanding Value, Estuary Unmodified and Estuary Modified coastal management areas as a Restricted Discretionary Activity (rather than a Controlled Activity provided for in Rule 45)</p> <p>OR</p>	<p>Decline</p> <p>Officers do not believe it is appropriate or necessary to include a new Rule that provides for the removal or demolition of structures in the Outstanding Value, Estuary Unmodified and Estuary Modified coastal management areas as a Restricted Discretionary Activity. Refer to submission point 1021.</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		provide for the removal or demolition of structures in the Outstanding Value, Estuary Unmodified and Estuary Modified coastal management areas as a Discretionary Activity under Rule 46.	
Rule 46 – Structure removal or demolition			
26 – Transpower NZ Ltd	1027	Amend Submitter seeks amendment to Rule 46 of the Plan to delete reference to the <i>National Environmental Standards for Electricity Transmission Activities</i> : <i>[...] or the Resource Management (National Environmental Standards for Electricity Transmission Activities Regulations 2009 (Appendix 6))</i> .	Accept The reference to the <i>National Environmental Standards for Electricity Transmission</i> is redundant and does not add further value to the Plan. Officers recommend granting the relief sought by the submitter.
37 – Petroleum Exploration and Production Association of NZ	1028	Support Retain Rule 46 of the Plan's Discretionary Activity classification as notified.	Accept Support noted.
43 – Royal Forest and Bird Protection Society	1029	Support Retain Rule 46 of the Plan as notified.	Accept Support noted.
46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	1030	Support Retain Rule 46 of the Plan as notified.	Accept Support noted.
Further submissions – Port Taranaki Ltd (32)		Support	
61 – Te Rūnanga o Ngāti Ruanui Trust	1031	Amend Submitter seeks amendment to Rule 46 of the Plan to include standards, terms and conditions to read: <i>(a) demolition or removal 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) demolition or removal of structure and discharge complies with tangata whenua indicators referred to in the tangata whenua monitoring plan</i>	Decline The submitter has sought the inclusion of standards/terms/conditions for rules in the Plan relating to discretionary and non-complying activities. Officers decline the relief noting that it is not standard planning practice for Discretionary Activity or Non-complying rules to include standards, terms and conditions. Conditions relating to a Non-complying Activity are developed on a case-by-case basis through the consenting process having regard to the relevant Plan policies.

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		<p><u>(c) demolition or removal of structure and discharge is consistent with iwi management plan.</u></p> <p>AND</p> <p>Include the following notification note:</p> <p><u>Resource consent applications under this Rule will be notified to tangata whenua.</u></p>	<p>Officers note that all matters identified by the submitter would be considered through the consenting process with Policies 1 to 21, 22, 38, 40, 41, 42, 44 and 49 being given effect to.</p> <p>In relation to notification requirements proposed by the submitter, officers note that the Plan is not intended to provide the operational detail for implementing every aspect of the Plan. Such detail is more appropriately included in the Council's standard operating procedures and or Mana Whakahono a Rohe agreements.</p>
Further submissions – Te Rūnanga o Ngāti Mutunga (40), Te Korowai o Ngāruahine Trust (41), Te Atiawa (58)		Support	
Rule 47 – Temporary occupation for community, recreational or sporting events			
22 – Lyndon DeVantier	1032	<p>Amend</p> <p>Submitter opposes Rule 47 of the Plan providing for the temporary occupation for community, recreational or sporting events, up to four days, as a Permitted Activity.</p>	<p>Decline</p> <p>Officers note that the purpose of Rule 47 is to allow for community, recreational or sporting events to occur as much as possible without imposing unnecessary costs and constraints on the event associated with obtaining a resource consent. It potentially applies to such events as national and regional sailing, surf live saving, surfing, triathlons, swimming events and beach carnivals.</p> <p>Officers recognise that temporary occupation of parts of the coastal marine area for such events may impact or impinge on other users. As part of the Coastal Plan review, Council compared the proposed rule against equivalent rules elsewhere in the country in terms of duration and area of the temporary occupation and noted that the duration of such events would ranged from three days to unlimited. Officers note that the relief sought by the submitter is more restrictive than the norm elsewhere in the country. Officers recommend no change to the four days.</p>
38 – Nigel Cliffe	1033	<p>Amend</p> <p>Submitter seeks amendment to Rule 47 of the Plan to limit temporary occupation for community, recreational or sporting events to no more than 3 consecutive days over a 5-day period, as a Permitted Activity.</p>	<p>Decline</p> <p>Officers note that the purpose of Rule 47 is to allow for community, recreational or sporting events to occur as much as possible without imposing unnecessary costs and constraints on the event associated with obtaining a resource consent. It potentially applies to such events as national and regional sailing, surf live saving, surfing, triathlons, swimming events and beach carnivals.</p> <p>Officers recognise that temporary occupation of parts of the coastal marine area for such events may impact or impinge on other users. As part of the Coastal Plan review, Council compared the proposed rule against equivalent rules elsewhere in</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
			the country in terms of duration and area of the temporary occupation and noted that the duration of such events ranged from three days to unlimited. Officers note that the relief sought by the submitter is more restrictive than the norm elsewhere in the country. Officers recommend no change the four days.
41 – Te Korowai o Ngāruahine Trust	1034	Amend	Accept in part
		Submitter seeks amendment to Rule 47 of the Plan 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: <i>(b) the activity does not have an adverse effect on the values associated with historic heritage identified in Schedule 5A and B [Historic heritage]; [...]</i>	Officers recommend granting the relief sought by the submitter in relation to amending Condition (c) to refer to Schedules 5A and 5B (rather than just Schedule 5). However, in relation to the notification requirements proposed by the submitter, officers note that the Plan is not intended to provide the operational detail for implementing every aspect of the Plan. Such detail is more appropriately included in the Council's standard operating procedures and or Mana Whakahono a Rohe agreements.
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Support	
42 – Ngāti Hine Hapu of Te Atiawa	1035	Amend	No relief necessary
		Submitter seeks amendment to Rule 47 of the Plan (if it remains a Permitted Activity) to include a new or amended condition that no activity can take place within 100m of an historic site unless consultation with iwi has taken place.	Officers believe no relief is necessary in that any activity must comply with Condition (b), which relates to the protection of historic heritage (and sites of significance to tangata whenua). Further more Condition (g) includes the requirement for the organisers to notify the Council. This provides the opportunity for Council to check that no scheduled sites of significance are likely to be affected and the appropriateness of a buffer distance. The need or appropriateness of a buffer zone would depend upon the activity and/or the values associated with the particular site. .
43 – Royal Forest and Bird Protection Society	1036	Amend	Decline
		Submitter seeks amendment to Rule 47 of the Plan to make temporary occupation for community, recreational or sporting events a Controlled Activity (rather than a Permitted Activity).	Officers do not recommend granting the relief sought by the submitter. Officers note that the purpose of Rule 47 is to allow for community, recreational or sporting events to occur as much as possible without imposing unnecessary costs and constraints on the event associated with obtaining a resource consent. It potentially applies to such events as national and regional sailing, surf live saving, surfing, triathlons, swimming events and beach carnivals and is largely a continuation of an existing rule in the current Plan.
Further submissions – Port Taranaki Ltd (32)		Oppose	
	1037	Amend	Decline

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
43 – Royal Forest and Bird Protection Society		Submitter seeks amendment to Rule 47 of the Plan to include matters for control to consider effects on indigenous biodiversity, natural character and natural features and landscapes.	Officers note that the purpose of Rule 47 is to allow for as many community, recreational or sporting events to occur as possible without imposing unnecessary costs and constraints associated with obtaining a resource consent. Of note the Permitted Activity rule already includes conditions that address indigenous biodiversity Any adverse effects. Council's experience with the current Rule has also been that any adverse effects are less than minor and are temporary and certainly do not impact on natural character, features and landscapes. However, through the notification requirement there is an opportunity for Council to undertake a preliminary assessment.
43 – Royal Forest and Bird Protection Society	1038	Amend Submitter seeks amendment to the note in Rule 47 of the Plan to refer to Rule 50, which is a Discretionary Activity classification.	Accept Officers recommend granting the relief sought by the submitter.
61 – Te Rūnanga o Ngāti Ruanui Trust	1039	Amend Submitter seeks amendment to Rule 47 of the Plan to include new or amended standards, terms and conditions to read: <i>(a) 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]; and taonga species protected under Taranaki iwi Deed of Settlement including those identified in Schedule 4C [Taonga species and habitat]</i> <i>(b) the activity does not have an adverse effect on the values associated with cultural and historic heritage identified in Schedule 5 [Cultural and Historic heritage];</i> <i>(ba) the activity does not have adverse effect on Schedules 1 and 2</i> <i>(bb) the activity does not adversely affect the suitability of the receiving environment for customary use;</i> <i>(bc) 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; [...]</i>	Accept in part The submitter is seeking amendment to Rule 45 of the Plan to include new and amended standards, terms and conditions. Specific comments on the new and amended proposed conditions are as follows: <ul style="list-style-type: none"> grant the relief in kind in relation to Condition (a). Officers recommend expanding the scope of Rule conditions to include reference to scheduled taonga species decline the relief sought in relation to Condition (b). Officers refer the submitter to previous comments made on expanding the scope of historic heritage decline the relief sought in relation to Condition (ba). Officers note that the effect of granting this relief would also make this rule redundant as Schedules 1 and 2 capture the whole coastal marine area plus landward parts of the coastal environment identified as having outstanding natural character or being an outstanding natural feature or landscape decline relief sought in relation to Condition (bb) and (bc) as unnecessary and uncertain for Plan users. The Rule is only providing for the removal and replacement of structures already existing in the coastal marine area. Officers note that impacts on cultural sites of significance are already addressed in Condition (b).

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Rule 48 – Continued occupation			
6 – Trans-Tasman Resources Ltd	1040	Support	Accept
		Retain Rule 48 of the Plan as notified.	Support noted.
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Oppose	
40 – Te Rūnanga o Ngāti Mutunga	1041	Amend	Decline
		Submitter seeks amendment to Rule 48 of the Plan to include two additional conditions to read: <i><u>(b) the activity does not have an adverse effect on the values associated with historic heritage identified in Schedule 5 (Historic Heritage)</u></i> <i><u>(c) the 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.</u></i>	Officers note that Rule 48 relates to the continued occupation of existing lawfully established structures where the occupation was a Permitted Activity at the time of its placement or erection). At the time of the original placement and erection of the structure wider considerations relating to historic heritage and indigenous biodiversity would have been addressed (under alternative rules). Officers believe that ongoing occupation of a structure is likely to have less adverse effects subject to it continuing to be used for its originally consented purpose. Officers do not believe it necessary to include additional conditions.
41 – Te Korowai o Ngāruahine Trust	1042	Amend	Decline
		Submitter seeks amendment to Rule 48 of the Plan to make the continued occupation of the common marine and coastal area, with an existing lawfully established structure (where the occupation was previously a Permitted Activity) a Restricted Discretionary Activity (rather than a Permitted Activity).	Officers note that Rule 48 relates to the continued occupation of existing lawfully established structures where the occupation was a Permitted Activity at the time of its placement or erection). At the time of the original placement and erection of the structure wider considerations relating to historic heritage and indigenous biodiversity would have been addressed (under alternative rules). Officers believe that ongoing occupation of a structure is likely to have less adverse effects subject to it continuing to be used for its originally consented purpose. Officers do not believe it practicable, necessary or appropriate to make the continued occupation of existing lawfully established structures in the coastal marine area a Restricted Discretionary Activity for which a resource consent would be required. Of note, as part of this Coastal Plan review, this Council has adopted a precautionary approach whereby, if uncertain that effects can be adequately identified and addressed as a Permitted Activity or Controlled Activity, it has determined that the effects will be considered as a fully Discretionary Activity to ensure issues are fully and comprehensively canvassed.

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
43 – Royal Forest and Bird Protection Society	1043	Amend	Accept in part
		Submitter seeks amendment to Rule 48 of the Plan by: <ul style="list-style-type: none"> amending Condition (a) to refer to the original permitted use of the structure removing Outstanding Value, Estuaries Unmodified, and Estuaries Modified coastal management areas from the rule and to make the continued occupation of an existing lawfully established structure in such areas (where the occupation was previously a Permitted Activity) a Restricted Discretionary Activity (rather than a Permitted Activity). 	Officers recommend amending Condition (a) to refer to the original permitted use of the structure. In relation to removing Outstanding Value, Estuaries Unmodified, and Estuaries Modified coastal management areas from the rule and to making the continued occupation of an existing lawfully established structure in such areas a Restricted Discretionary Activity seems unnecessary and would result in the imposition of unnecessary consenting costs for structures already present in these areas and which are considered to be having less than minor adverse effects (noting that issues with placement have already been separately addressed in another rule).
45 – Powerco	1044	Support	Accept
		Retain Rule 48 of the Plan as notified.	Support noted.
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Oppose	
46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	1045	Support	Accept
		Retain Rule 48 of the Plan as notified.	Support noted.
Further submissions – Port Taranaki Ltd (32)		Support	
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Oppose	
47 – Fonterra	1046	Support	Accept
		Retain Rule 48 of the Plan as notified.	Support noted.
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Oppose	
58 – Te Atiawa	1047	Amend	Decline
		Submitter seeks amendment to Rule 48 of the Plan to make the continued occupation of the common marine and coastal area, with an existing lawfully	Officers note that Rule 48 relates to the continued occupation of existing lawfully established structures where the occupation was a Permitted Activity at the time of its placement or erection).

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		established structure (where the occupation was previously a Permitted Activity) a Restricted Discretionary Activity (rather than a Permitted Activity).	<p>At the time of the original placement and erection of the structure wider considerations relating to historic heritage and indigenous biodiversity would have been addressed (under alternative rules). Officers believe that ongoing occupation of a structure is likely to have less adverse effects subject to it continuing to be used for its originally consented purpose. Officers do not believe it practicable, necessary or appropriate to make the continued occupation of existing lawfully established structures in the coastal marine area a Restricted Discretionary Activity for which a resource consent would be required.</p> <p>Of note, as part of this Coastal Plan review, this Council has adopted a precautionary approach whereby, if uncertain that effects can be adequately identified and addressed as a Permitted Activity or Controlled Activity, it has determined that the effects will be considered as a fully Discretionary Activity to ensure issues are fully and comprehensively canvassed.</p>
Rule 49 – Continued occupation			
15 – Surfbreak Protection Society	1048	<p>Other</p> <p>Submitter seeks that there be no impacts to surf breaks.</p>	<p>No relief necessary</p> <p>Submitter's comments are noted and have been previously addressed in submission point 446 relating to surfing policies. Policy 19 would be considered as part of any resource consent application under this Rule.</p>
41 – Te Korowai o Ngāruahine Trust	1049	<p>Amend</p> <p>Submitter seeks amendment to Rule 49 of the Plan to make the continued occupation of the common marine and coastal area, with an existing lawfully established structure (where the occupation was previously a Controlled Activity) a Restricted Discretionary Activity (rather than a Controlled Activity).</p>	<p>Decline</p> <p>Officers note that Rule 49 relates to the continued occupation of existing lawfully established structures after the expiry of its consent (and where the occupation was a Controlled Activity at the time of its placement or erection).</p> <p>At the time of the original placement and erection of the structure wider considerations relating to historic heritage and indigenous biodiversity would have been addressed (under alternative rules). Officers believe that ongoing occupation of a structure is likely to have less adverse effects subject to it continuing to be used for its originally consented purpose. Officers do not believe it necessary to include additional conditions.</p> <p>Of note, as part of this Coastal Plan review, this Council has adopted a precautionary approach whereby, if uncertain that effects can be adequately identified and addressed as a Permitted Activity or Controlled Activity, it has determined that the effects will be considered as a fully Discretionary Activity to ensure issues are fully and comprehensively canvassed.</p>
Further submissions – Te Rūnanga o Ngāti Mutunga (40), Te Atiawa (58)		Support	

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
43 – Royal Forest and Bird Protection Society	1050	Amend	Decline
		<p>Submitter seeks amendment to Rule 49 of the Plan by:</p> <ul style="list-style-type: none"> removing Outstanding Value, Estuaries Unmodified, and Estuaries Modified coastal management areas from the rule and to make the continued occupation of an existing lawfully established structure in such areas (where the occupation was previously a Controlled Activity) a Restricted Discretionary Activity (rather than a Controlled Activity) 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. 	<p>Officers do not recommend granting the relief sought by the submitter.</p> <p>In relation to removing Outstanding Value, Estuaries Unmodified, and Estuaries Modified coastal management areas from the rule and to making the continued occupation of an existing lawfully established structure in such areas a Restricted Discretionary Activity is not considered appropriate or necessary and would result in the imposition of unnecessary consenting costs for structures already present in these areas and which are considered to be having less than minor adverse effects (noting that issues with placement have already been separately addressed in another rule).</p> <p>Officers note that Rule 49 relates to the continued occupation of existing lawfully established structures after the expiry of its consent (and where the occupation was a Controlled Activity at the time of its placement or erection). At the time of the original placement and erection of the structure wider considerations relating to indigenous biodiversity and natural character would have been addressed (under alternative rules). Officers believe that ongoing occupation of a structure is likely to have less adverse effects subject to it continuing to be used for its originally consented purpose.</p> <p>Of note, as part of this Coastal Plan review, there has been little support for the inclusion of Restricted Discretionary Activities. This Council has adopted a precautionary approach whereby, if uncertain that effects can be adequately identified and addressed as a Permitted Activity or Controlled Activity, it has determined that the effects will be considered as a fully Discretionary Activity to ensure issues are fully and comprehensively canvassed.</p>
45 – Powerco	1051	Support	Accept
		Retain Rule 49 of the Plan as notified.	Support noted.
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Oppose	
46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	1052	Support	Accept
		Retain Rule 49 of the Plan as notified.	Support noted.

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Further submissions – Port Taranaki Ltd (32)		Support	
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Oppose	
47 – Fonterra	1053	Support	Accept
		Retain Rule 49 of the Plan as notified.	Support noted.
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Oppose	
58 – Te Atiawa	1054	Amend	Decline
		Submitter seeks amendment to Rule 49 to make the continued occupation of an existing lawfully established structure in such areas (where the occupation was previously a Controlled Activity) a Restricted Discretionary Activity (rather than a Controlled Activity).	<p>Officers do not recommend granting the relief sought by the submitter.</p> <p>In relation to removing Outstanding Value, Estuaries Unmodified, and Estuaries Modified coastal management areas from Rule 49, and to making the continued occupation of an existing lawfully established structure in such areas a Restricted Discretionary Activity, is not considered appropriate or necessary and would result in the imposition of unnecessary consenting costs for structures already present in these areas and which are considered to be having less than minor adverse effects (noting that issues with placement have already been separately addressed in another rule).</p> <p>Officers note that Rule 49 relates to the continued occupation of existing lawfully established structures after the expiry of its consent (and where the occupation was a Controlled Activity at the time of its placement or erection). At the time of the original placement and erection of the structure wider considerations relating to indigenous biodiversity and natural character would have been addressed (under alternative rules). Officers believe that ongoing occupation of a structure is likely to have less adverse effects subject to it continuing to be used for its originally consented purpose.</p> <p>Of note, as part of this Coastal Plan review, this Council has adopted a precautionary approach whereby, if uncertain that effects can be adequately identified and addressed as a Permitted Activity or Controlled Activity, it has determined that the effects will be considered as a fully Discretionary Activity to ensure issues are fully and comprehensively canvassed.</p>
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Oppose	
	1055	Amend	Decline

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
61 – Te Rūnanga o Ngāti Ruanui Trust		<p>Submitter seeks amendment to Rule 49 of the Plan to include new and amended standards/terms/conditions to read:</p> <p><i>(a) the structure is being used for its originally intended purpose;</i></p> <p><i><u>(b) continued occupation does not adversely affect the matters/values identified for protection by mana whenua in the cultural impact assessment;</u></i></p> <p><i><u>(c) continued occupation complies with tangata whenua indicators referred to in the tangata whenua monitoring plan</u></i></p> <p><i><u>(d) continued occupation is consistent with iwi management plan.</u></i></p>	<p>Officers recommend declining the relief sought in relation to Conditions (b), (c) and (d) as being uncertain in terms of their application and given the details as to managing adverse effects on a range of values including cultural and heritage values and monitoring are already identified in the rule as matters of control.</p> <p>Officers note that Rule 48 relates to the continued occupation of existing lawfully established structures where the occupation was a Controlled Activity at the time of its placement or erection. At the time of the original placement and erection of the structure wider considerations relating to historic heritage and indigenous biodiversity would have been addressed (under alternative rules). Officers believe that ongoing occupation of a structure is likely to have less adverse effects subject to it continuing to be used for its originally consented purpose. Officers do not believe it necessary to include additional conditions.</p>
Further submissions – Te Rūnanga o Ngāti Mutunga (40), Te Korowai o Ngāruahine Trust (41), Te Atiawa (58)		Support	
61 – Te Rūnanga o Ngāti Ruanui Trust	1056	<p>Amend</p> <p>Submitter seeks amendment to the Control/notification column for Rule 49 of the Plan to read:</p> <p><i>Control is reserved over:</i></p> <p><i>[...]</i></p> <p><i>(d) effects on water quality <u>and mauri values;</u></i></p> <p><i>(e) effects on ecological values;</i></p> <p><i>(f) effects on historic, cultural and amenity values;</i></p> <p><i>(g) effects on surf breaks;</i></p> <p><i>(h) effects of occupation on public access;</i></p> <p><i>(i) effects on navigation;</i></p> <p><i>(j) effects of noise and light;</i></p> <p><i><u>(k) effects on Cultural Zone (referred to in Spatial Plan);</u></i></p> <p><i><u>(l) monitoring (including tangata whenua indicators referred to in the tangata whenua monitoring plan) and information requirements;</u></i></p> <p><i>(m) duration of consent; and</i></p> <p><i>(n) review of consent conditions.</i></p>	<p>Decline</p> <p>Officers recommend declining the relief sought by the submitter.</p> <p>The suggested changes seem to be mixing jurisdictional, policy and operational matters and introducing a level of specificity that is not considered appropriate or necessary. Most of the changes sought are a subset of matters that have already been provided for while the submitter has also introduced some new concepts such as a cultural zone and a spatial plan that do not fit within the Proposed Plan framework. There is a 'requirement' to be consistent with iwi management plans, while the submitter is silent on how other planning documents might fit within this framework.</p> <p>Officers note that this activity is already subject to the General Policies 1 to 21 of which Policies 15 [Historic heritage] and 16 [Relationship of tangata whenua] are particularly relevant. Officers further note that there will be an opportunity to develop an agreed framework and operational detail for implementing the Plan as part of any Mana Whakahoā Rohe agreement with the submitter.</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		Resource consent applications under this Rule will not be publicly notified but may be limited notified <u>be notified to tangata whenua.</u>	
Further submissions – Te Rūnanga o Ngāti Mutunga (40), Te Korowai o Ngāruahine Trust (41), Te Atiawa (58)		Support	
Rule 50 – Coastal occupation			
26 – Transpower NZ Ltd	1057	Amend Submitter seeks amendment to Rule 50 of the Plan to delete reference to the <i>National Environmental Standards for Electricity Transmission Activities: [...] or the Resource Management (National Environmental Standards for Electricity Transmission Activities Regulations 2009 (Appendix 6)).</i>	Accept The reference to the <i>National Environmental Standards for Electricity Transmission</i> is redundant and does not add further value to the Plan. Officers recommend granting the relief sought by the submitter.
29 – Department of Conservation	1058	Amend Submitter seeks amendment to Rule 50 of the Plan's activity description to read: <i>[...] and the activity does not come within or comply with Rules 47 – 50 49 [...].</i>	Accept Officers recommend granting the relief sought by the submitter.
32 – Port Taranaki	1059	Amend Submitter seeks amendment to Rule 50 of the Plan's activity description to read: <i>[...] and the activity does not come within or comply with Rules 47 – 50 49 [...].</i>	Accept Officers recommend granting the relief sought by the submitter.
46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	1060	Support Retain Rule 50 of the Plan as notified.	Accept Support noted.
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Oppose	
47 – Fonterra	1061	Support Retain Rule 50 of the Plan as notified.	Accept Support noted.
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Oppose	

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
61 – Te Rūnanga o Ngāti Ruanui Trust	1062	Amend	Decline
		<p>Submitter seeks amendment to Rule 50 of the Plan to include standards, terms and conditions to read:</p> <p><i><u>(a) the occupation does not adversely affect the matters/values identified for protection by mana whenua in the cultural impact assessment;</u></i></p> <p><i><u>(b) the occupation complies with tangata whenua indicators referred to in the tangata whenua monitoring plan</u></i></p> <p><i><u>(c) the occupation is consistent with iwi management plan.</u></i></p> <p>AND</p> <p>Include the following notification note:</p> <p><i><u>Resource consent applications under this Rule will be notified to tangata whenua.</u></i></p>	<p>The submitter has sought the inclusion of standards/terms/conditions for rules in the Plan relating to Discretionary and Non-complying Activities.</p> <p>Officers decline the relief noting that it is not standard planning practice for Discretionary Activity or Non-complying Activity rules to include standards, terms and conditions. Conditions relating to a Non-complying Activity are developed on a case-by-case basis through the consenting process having regard to the relevant Plan policies.</p> <p>Officers note that all matters identified by the submitter would be considered through the consenting process with Policies 1 to 21, 31, 32 and 39 being given effect to.</p> <p>In relation to notification requirements proposed by the submitter, officers note that the Plan is not intended to provide the operational detail for implementing every aspect of the Plan. Such detail is more appropriately included in the Council's standard operating procedures and or Mana Whakahono a Rohe agreements.</p>
Further submissions – Te Rūnanga o Ngāti Mutunga (40), Te Korowai o Ngāruahine Trust (41)		Support	
NEW Rule 50A – Coastal occupation			
43 – Royal Forest and Bird Protection Society	1063	Amend	Decline
		<p>Submitter seeks amendment to Plan to make the continued occupation of an existing lawfully established structure in Outstanding Value, Estuaries Unmodified, and Estuaries Modified coastal management areas (where the occupation was previously a Permitted or Controlled Activity).</p>	<p>Refer to submission points 1044 and 1051.</p>
Rule 51 – Clearance of outfalls, culverts and intake structures			
21 – Climate Justice Taranaki	1064	Amend	Decline
		<p>Submitter seeks amendment to Rule 51 [Clearance of outfalls, culverts and intake structures and any associated activities] of the Plan to make the activity Discretionary (rather than Permitted) in coastal management areas: Outstanding value and Estuaries Unmodified – especially the discharge of contaminants.</p>	<p>Officers recommend declining the relief sought by the submitter.</p> <p>Officers note that the activity is to allow minor disturbances of the foreshore and seabed for the purpose of removing accumulated sediment that is adversely affecting the use and performance of a culvert, outfall or intake structure. Anticipated effects should be less than minor, subject to compliance with the standards, terms and conditions.</p> <p>Of note, Rule 51 relates only to maintenance activities (and incidental discharges) associated with existing structures rather than the discharge itself. Given that the</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
			placement of these structures are already authorised in Outstanding value and Estuaries Unmodified coastal management areas, requiring a resource consent for ongoing maintenance works is not considered appropriate or necessary.
40 – Te Rūnanga o Ngāti Mutunga	1065	<p>Amend</p> <p>Submitter seeks amendment to Rule 51 of the Plan to include two additional conditions:</p> <p><i>(f) the activity does not have an adverse effect on the values associated with historic heritage identified in Schedule 5 (Historic Heritage)</i></p> <p><i>(g) the 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.</i></p>	<p>Decline</p> <p>Officers note that Rule 51 relates to allowing minor disturbances of the foreshore and seabed for the purpose of removing accumulated sediment that is adversely affecting the use and performance of a culvert, outfall or intake structure.</p> <p>At the time of the original placement and erection of the structure wider considerations relating to historic heritage and indigenous biodiversity would have been addressed (under alternative rules). Officers believe that any adverse effects associated with ongoing maintenance works associated with these structures will be less than minor and transitory, subject to compliance with the standards, terms and conditions. Officers do not believe it necessary to include additional conditions.</p>
Further submissions – Te Korowai o Ngāruahine Trust (41)		Support	
40 – Te Rūnanga o Ngāti Mutunga	1066	<p>Amend</p> <p>Submitter opposes permitting the clearance of outfalls, culverts and intake structures in the coastal marine area and seek amendment to Rule 51 of the Plan to make such activities be a Discretionary Activity.</p>	<p>Decline</p> <p>Officers recommend declining the relief sought by the submitter.</p> <p>Officers note that the activity is to allow minor disturbances of the foreshore and seabed for the purpose of removing accumulated sediment that is adversely affecting the use and performance of a culvert, outfall or intake structure. Anticipated effects should be less than minor, subject to compliance with the standards, terms and conditions.</p> <p>Of note Rule 51 relates only to maintenance activities (and incidental discharges) associated with existing structures rather than the discharge itself. Requiring a resource consent for ongoing maintenance works is not considered appropriate or necessary.</p>
43 – Royal Forest and Bird Protection Society	1067	<p>Amend</p> <p>Submitter seeks amendment to Rule 51 of the Plan to clarify that the rule provides for clearance of lawfully established structures only and add further conditions and limits to specify:</p> <ul style="list-style-type: none"> the amount of disturbance or deposition of material a limit or guidance on “<i>minimum necessary</i>” to ensure removal of material does not result in adverse effects 	<p>Accept in part</p> <p>Officer recommend amending the Activity Description of Rule 51 to refer to lawfully established structures.</p> <p>In relation to the other matters raised by the submitter, officers do not recommend granting the reliefs sought. Of note, the Rule is based on an equivalent rule in the current Plan for which there have been no issues with its implementation and application to date. Specific comments are as follows:</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		<ul style="list-style-type: none"> whether mitigation may be appropriate in outstanding or significant locations and require consent the type of material which can be deposited adverse effects of depositing the material inappropriately. 	<ul style="list-style-type: none"> the amount of disturbance or deposition of material will depend upon the structure but given there can be significant costs associated with doing this maintenance works there is an incentive for the person not to do more than they need to do to protect the use and performance of their culvert, outfall or intake structure as per above, the minimum amount of material that can be removed will depend upon the structure but given there can be significant costs associated with doing this maintenance works, again, there is an incentive for the person not to do more than they need to do to protect the use and performance of their culvert, outfall or intake structure as per the reading of the condition, any material placed on the foreshore or seabed will consist of the same material as the receiving environment., e.g. shingle or rocks on rocky shores, sand on sandy beaches or seafloors subject to the standards, terms and conditions, officers believe adverse environments will be appropriately managed. However, in response to concerns raised by the submitter, Officers recommend the inclusion of two new standards, terms and conditions addressing adverse effects on indigenous biodiversity and historic heritage.
47 – Fonterra	1068	<p>Amend</p> <p>Submitter seeks amendment to Condition (e) of Rule 51 of the Plan to read: <i>(e) activity does not restrict public access for more than seven days 24 hours.</i></p>	<p>Accept</p> <p>Submitter notes that clearance activities on larger structures may take longer than one day due to weather events and notes that these structures are located in areas where there is generally low levels of demand for access. Officers recommend granting the relief sought by the submitter.</p>
57 – Heritage New Zealand	1069	<p>Amend</p> <p>Submitter seeks amendment to Rule 51 of the Plan to include an additional condition: <i>(f) disturbance does not occur within a site included in Schedule 5 [Historic Heritage].</i></p>	<p>Accept</p> <p>Officers recommend granting the relief sought by the submitter.</p>
58 – Te Atiawa	1070	<p>Amend</p>	<p>Accept</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		<p>Submitter seeks amendment to Rule 51 of the Plan to include two additional conditions to read:</p> <p><i>(f) 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], and;</i></p> <p><i>(g) the activity does not have an adverse effect on the values associated with sites of significance to Māori identified in Schedule 5A and 5B.</i></p>	Officers recommend granting the relief sought by the submitter.
Further submissions – Te Korowai o Ngāruahine Trust (41)		Support	
59 – KiwiRail	1071	<p>Support</p> <p>Retain Rule 51 of the Plan as notified.</p>	<p>Accept</p> <p>Support noted.</p>
Further submissions – Port Taranaki Ltd (32)		Support	
61 – Te Rūnanga o Ngāti Ruanui Trust	1072	<p>Amend</p> <p>Submitter seeks amendment to Rule 51 of the Plan to include new standards, terms and conditions to read:</p> <p>[...]</p> <p><i>(f) the discharge does not have an adverse effect on the values associated with cultural and historic heritage identified in Schedule 5 [Cultural and Historic heritage];</i></p> <p><i>(g) the discharge does not have adverse effect on Schedules 1 and 2;</i></p> <p><i>(h) 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;</i></p> <p><i>(i) the discharge does not adversely affect the suitability of the receiving environment for customary use;</i></p> <p><i>(j) activity does not have an adverse effect on any threatened or at risk, or regionally distinctive species, or any rare and 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].</i></p>	<p>Grant in part</p> <p>The submitter is seeking amendment to Rule 51 of the Plan to include new and amended standards, terms and conditions that primarily address cultural and historic heritage and indigenous biodiversity considerations.</p> <p>Officers note that a number of submitters have raised similar considerations. Officers recommend that in a manner that is consistent to that adopted in conditions adopted in other rules that two new conditions be added to the rule that reads as follows:</p> <p>[...]</p> <p><i>(aa) disturbance 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]; (43) (58) (61)</i></p> <p><i>(ab) disturbance does not have an adverse effect on the values associated with historic heritage identified in Schedule 5A and B [Historic heritage];</i></p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Further submissions – Te Korowai o Ngāruahine Trust (41)		Support	
Rule 52 – Collection of benthic grab samples			
6 – Trans-Tasman Resources Ltd	1073	<p>Support</p> <p>Retain Rule 52 of the Plan 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.</p>	<p>Accept</p> <p>Support noted.</p>
Further submissions – Port Taranaki Ltd (32)		Support	
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Oppose	
6 – Trans-Tasman Resources Ltd	1074	<p>Amend</p> <p>Submitter seeks consequential changes to Condition (g) of Rule 52 of the Plan that gives effect to previous reliefs sought. Consequential amendments read as follows: <i>(g) sampling does not have an adverse effect on any threatened or at risk, or regionally distinctive (declining) species, or any rare and uncommon ecosystem type, or any sensitive marine benthic habitat including those identified in Schedule 4 [Significant indigenous biodiversity] or any reef system; [...]</i></p>	<p>Decline</p> <p>Officers do not recommend granting this relief as deleting reference to regionally distinctive species would be inconsistent with Bio Policy 4 of the <i>Regional Policy Statement</i>, which refers to, amongst other things, the presence of regionally distinctive species as a criteria for identifying significant indigenous biodiversity values in Taranaki. The category also contributes to giving effect to Policy 11(a)(iv) of the <i>New Zealand Coastal Policy Statement</i>. It is the Council's view that Plan provisions should recognise the local context and provide for the protection of indigenous species that are locally significant to the Taranaki region, irrespective of their national threat status.</p> <p>Officers also recommend declining the relief sought in relation to deleting reference to sensitive benthic habitats. Sensitive benthic habitats refer to marine habitats identified in the report https://www.trc.govt.nz/assets/Documents/Plans-policies/CoastalPlanReview/SensitiveHabitats.PDF that have low tolerance to habitat damage and for which the time for the habitat to recover from any damage would be significant. Given the sensitivity and vulnerability of such marine habitats, officers consider it appropriate that they be recognised and provided for in Rule 52.</p>
Further submissions – Department of Conservation (29)		Oppose	
	1075	Amend	Decline

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
41 – Te Korowai o Ngāruahine Trust		Submitter seeks amendment to Rule 52 of the Plan to require notification to iwi of any benthic grab sampling authorised by this rule.	In relation to notification requirements proposed by the submitter, officers note that the Plan is not intended to provide the operational detail for implementing every aspect of the Plan. Such detail is more appropriately included in the Council's standard operating procedures and/or any Mana Whakahono a Rohe agreements.
Further submissions – Trans-Tasman Resources Ltd (6)	Oppose		
Further submissions – Te Rūnanga o Ngāti Mutunga (40), Te Atiawa (58)	Support		
43 – Royal Forest and Bird Protection Society	1076	Support Retain Rule 52 of the Plan as notified.	Accept Support noted.
58 – Te Atiawa	1077	Amend Submitter seeks amendment to Rule 52 of the Plan so that Iwi are notified.	Decline In relation to notification requirements proposed by the submitter, officers note that the Plan is not intended to provide the operational detail for implementing every aspect of the Plan. Such detail is more appropriately included in the Council's standard operating procedures and/or any Mana Whakahono a Rohe agreements.
Further submissions – Trans-Tasman Resources Ltd (6)	Oppose		
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)	Support		
61 – Te Rūnanga o Ngāti Ruanui Trust	1078	Amend Submitter seeks amendment to Rule 52 of the Plan to include new and amended standards, terms and conditions to read: [...] <i>(f) sampling does not have an adverse effect on the values associated with cultural and historic heritage identified in Schedule 5 [Cultural and Historic heritage];</i> <i>(fa) the sampling does not have adverse effect on Schedules 1 and 2;</i> <i>(fb) 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;</i> <i>(g) sampling does not have an adverse effect on any threatened or at risk, or regionally distinctive species, or any rare and 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] [...]</i>	Accept in part The submitter is seeking amendment to Rule 52 of the Plan to include new and amended standards, terms and conditions. Specific comments on the new and amended proposed conditions are as follows: <ul style="list-style-type: none"> decline the relief sought in relation to Condition (f). Officers refer the submitter to previous comments made on expanding the scope of historic heritage decline the relief sought in relation to Condition (fa). Officers note that the effect of granting this relief would also make this rule redundant as Schedules 1 and 2 capture the whole coastal marine area plus landward parts of the coastal environment identified as having outstanding natural character or being an outstanding natural feature or landscape and it requires no adverse effects (even those less than minor) decline relief sought in relation to Condition (fb) as unnecessary and uncertain for Plan users. The Rule is only providing for the collection of

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Further submissions – Trans-Tasman Resources Ltd (6)		Oppose	<p>benthic grab samples for scientific or monitoring purposes in the coastal marine area. Officers note that impacts on cultural sites of significance are already addressed in Condition (f)</p> <ul style="list-style-type: none"> grant the relief in kind in relation to Condition (d). Officers recommend expanding the scope of Rule conditions to include reference to scheduled taonga species.
Rule 53 – Minor disturbance and removal			
6 – Trans-Tasman Resources Ltd	1079	Support	Accept
		Retain Rule 53 of the Plan as this rule recognises the minor effects arising from such disturbance and removal.	Support noted.
Further submissions – Climate Justice Taranaki Inc (21), Te Rūnanga o Ngāti Ruanui Trust (61)		Oppose	
43 – Royal Forest and Bird Protection Society	1080	Amend	Decline
		Submitter supports retaining Conditions (c) to (g) but seeks amendment to Rule 53 of the Plan by removing Outstanding Value, Estuaries Unmodified, and Estuaries Modified coastal management areas from the rule and to make minor disturbance and removal of sand, shingle or other natural material in such areas a Restricted Discretionary Activity (rather than a Permitted Activity).	Officers note that Rule 53 is a new rule providing for the removal of small quantities of sand for non-commercial purposes, e.g. for the sandpit or material for customary uses. Subject to compliance with standards, terms and conditions set out in the Rule, any adverse effects would be less than minor and transitory. Officers do not believe it appropriate or necessary to require people to obtain a resource consent to take less than 0.5 m ³ of sand, shingle, shell or other natural material.
Further submissions – Climate Justice Taranaki Inc (21)		Support	
43 – Royal Forest and Bird Protection Society	1081	Amend	Decline
		Submitter seeks amendment to Rule 53 of the Plan 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.	Refer to submission point 1081. Officers do not recommend requiring people to get a resource consent for such small scale activities. Notwithstanding that, it is officers' contention that indigenous biodiversity considerations are adequately addressed in the standards, terms and conditions.
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Oppose	
	1082	Amend	Decline

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
43 – Royal Forest and Bird Protection Society		Submitter seeks amendment to Rule 53 of the Plan by adding a new condition that restricts the activity to outside of bird breeding periods.	Refer to submission point 1080. Officers do not recommend requiring people to get a resource consent for such small scale activities. Notwithstanding that it is officers' contention that indigenous biodiversity considerations are adequately addressed in the standards, terms and conditions.
61 – Te Rūnanga o Ngāti Ruanui Trust	1083	<p>Amend</p> <p>Submitter seeks amendment to Rule 53 of the Plan to include new and amended standards/terms/conditions to read:</p> <p><i>(a) the activity does not have an adverse effect on the values associated with <u>cultural and historic heritage identified in Schedule 5 [Cultural and Historic heritage];</u></i></p> <p><i><u>(aa) the activity does not have adverse effect on Schedules 1 and 2;</u></i></p> <p><i><u>(ab) 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></i></p> <p><i>(b) the activity does not have an adverse effect on any threatened or at risk, or regionally distinctive species, or any rare and uncommon ecosystem type, or any sensitive marine benthic habitat including those identified in Schedule 4 [Significant indigenous biodiversity] or any reef system <u>and taonga species protected under Taranaki iwi Deed of Settlement including those identified in Schedule 4C [Taonga species and habitat]; [...]</u></i></p>	<p>Accept in part</p> <p>The submitter is seeking amendment to Rule 53 of the Plan to include new and amended standards, terms and conditions. Specific comments on the new and amended proposed conditions are as follows:</p> <ul style="list-style-type: none"> decline the relief sought in relation to Condition (a). Officers refer the submitter to previous comments made on expanding the scope of historic heritage decline the relief sought in relation to Condition (aa). Officers note that the effect of granting this relief would also make this rule redundant as Schedules 1 and 2 capture the whole coastal marine area plus landward parts of the coastal environment identified as having outstanding natural character or being an outstanding natural feature or landscape and it requires no adverse effects (even those less than minor or transitory) decline relief sought in relation to Condition (ab) as unnecessary and uncertain for Plan users. The Rule is only providing for the extraction of small quantities of material (e.g. for a sandpit) in the coastal marine area. Officers also note that impacts on cultural sites of significance are already addressed in Condition (a) grant the relief in kind in relation to Condition (b). Officers recommend expanding the scope of Rule conditions to include reference to scheduled taonga species.
Further submissions – Trans-Tasman Resources Ltd (6)		Oppose	
Further submissions – Climate Justice Taranaki Inc (21)		Support	
Rule 54 – Burial of dead animals			
29 – Department of Conservation	1084	<p>Amend</p> <p>Submitter seeks amendment to Rule 54(e) of the Plan to read:</p> <p><i>(e) <u>except for seals</u>, where a marine mammal is buried, the relevant iwi authority is notified prior to the burial taking place [...]</i></p>	<p>Accept</p> <p>The submitter notes that most of the marine mammals that the Department of Conservation bury are dead seals and that the frequency of dead seal burials means that it is likely to be impracticable to consult with iwi on every occasion. The submitter further notes that the Taranaki Iwi deed of settlement already adequately</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
			covers the requirement for the Department to cooperate with and advise iwi of any marine mammal strandings and burials. Officers recommend granting the relief sought by the submitter.
40 – Te Rūnanga o Ngāti Mutunga	1085	Amend Submitter seeks amendment to Rule 54(b) of the Plan to read: <i>(b) the activity does not occur at any site identified in Schedule 56B [Sites of significance to Māori] [...]</i>	Accept Officers recommend granting the relief sought by the submitter.
Further submissions – Te Korowai o Ngāruahine Trust (41)		Support	
58 – Te Atiawa	1086	Support in Part Submitter seeks amendment to Rule 54(b) of the Plan to read: <i>(b) the activity does not occur at any site identified in Schedule 56B [Sites of significance to Māori] [...]</i>	Accept Officers recommend granting the relief sought by the submitter.
Further submissions – Te Korowai o Ngāruahine Trust (41)		Support	
60 – Te Kaahui o Rauru	1087	Amend Submitter seeks amendment to Rule 54 of the Plan to require active involvement of tangata whenua (not just notification) when it comes to the burial of dead animals on the beach, particularly the burial of marine mammals.	Decline In relation to notification requirements proposed by the submitter, officers note that the Plan is not intended to provide the operational detail for implementing every aspect of the Plan. Such detail is more appropriately included in the Council's standard operating procedures and/or any Mana Whakahono a Rohe agreements. Notwithstanding the above, officers note that Council routinely cooperates with the Department of Conservation in such matters, which, in turn, have noted that the Taranaki Iwi deed of settlement adequately covers requirements for the Department to cooperate with and advise iwi of any marine mammal strandings and burials.
Further submissions – Te Korowai o Ngāruahine Trust (41)		Support	
61 – Te Rūnanga o Ngāti Ruanui Trust	1088	Amend Submitter seeks amendment to Rule 54 of the Plan to include new and amended standards, terms and conditions to read:	Accept in part

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		<p><i>(a) the activity does not have an adverse effect on the values associated with <u>cultural and historic heritage identified in Schedule 5 [Cultural and Historic heritage]</u>;</i></p> <p><i>(aa) the activity does not have adverse effect on Schedules 1 and 2;</i></p> <p><i>(ab) 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;</i></p> <p><i>(b) the activity does not occur at any site identified in 6B [Sites of significance to Māori and associated values] except with express permission of the relevant iwi authority;</i></p> <p><i>(c) activity complies with the general standards in Section 8.6;</i></p> <p><i>(d) the activity does not have an adverse effect on any threatened or at risk, or regionally distinctive species, or any rare and uncommon ecosystem type, or any sensitive marine benthic habitat including those identified in Schedule 4 [Significant indigenous biodiversity] or any reef system <u>and taonga species protected under Taranaki iwi Deed of Settlement including those identified in Schedule 4C [Taonga species and habitat]</u>; [...]</i></p>	<p>The submitter is seeking amendment to Rule 54 of the Plan to include new and amended standards, terms and conditions. Specific comments on the new and amended proposed conditions are as follows:</p> <ul style="list-style-type: none"> decline the relief sought in relation to Condition (a). Officers refer the submitter to previous comments made on expanding the scope of historic heritage decline the relief sought in relation to Condition (aa) and (ab). Officers note that the effect of granting this relief would also make this rule redundant as Schedules 1 and 2 capture the whole coastal marine area plus landward parts of the coastal environment identified as having outstanding natural character or being an outstanding natural feature or landscape and it requires no adverse effects (even those less than minor or transitory) decline relief sought in relation to deleting Condition (b) as express permission from the appropriate iwi authority should the burial of dead animals be required in their sites of significance is considered appropriate grant the relief in kind in relation to Condition (b). Officers recommend expanding the scope of Rule conditions to include reference to scheduled taonga species.
Further submissions – Te Korowai o Ngāruahine Trust (41)		Support	
Rule 55 – Dredging and spoil disposal (Port)			
43 – Royal Forest and Bird Protection Society	1089	Support	Accept
		Retain Rule 55 of the Plan as notified.	Support noted.
58 – Te Atiawa	1090	Support	Accept
		Retain Rule 55 of the Plan as notified.	Support noted.
Rule 56 – Dredging and spoil disposal (Open Coast)			
43 – Royal Forest and Bird Protection Society	1091	Support	Accept
		Retain Rule 56 of the Plan as notified.	Rule 56 is retained as notified.

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Further submissions – Port Taranaki Ltd (32)		Support	
58 – Te Atiawa	1092	<p>Amend</p> <p>Submitter seeks amendment to Rule 56 of the Plan to include the following conditions:</p> <p><i><u>(a) 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], and;</u></i></p> <p><i><u>(b) the activity does not have an adverse effect on the values associated with sites of significance to Māori identified in Schedule 5A and 5B.</u></i></p>	<p>Decline</p> <p>The submitter has sought the inclusion of standards, terms and conditions for rules in the Plan relating to Discretionary activities.</p> <p>Officers decline the relief noting that it is not standard planning practice for Discretionary or Non-complying Activity rules to include standards, terms and conditions. Conditions relating to a Discretionary Activity are developed on a case-by-case basis through the consenting process having regard to the relevant Plan policies.</p> <p>Officers note that all matters identified by the submitter would be considered through the consenting process with Policies 1 to 21, 22, 39, 40, 41, 42, 43, 44 and 49 being given effect to. In particular, Policy 14 [Indigenous biodiversity], Policy 15 [Historic heritage] and Policy 16 [Relationship with tangata whenua] will provide protections for areas of concern identified by the submitter.</p>
Further submissions – Te Rūnanga o Ngāti Mutunga (40), Te Korowai o Ngāruahine Trust (41)		Support	
61 – Te Rūnanga o Ngāti Ruanui Trust	1093	<p>Amend</p> <p>Submitter seeks amendment to Rule 56 of the Plan to include standards, terms and conditions to read:</p> <p><i><u>(a) the activity does not adversely affect the matters/values identified for protection by mana whenua in the cultural impact assessment;</u></i></p> <p><i><u>(b) the activity complies with tangata whenua indicators referred to in the tangata whenua monitoring plan</u></i></p> <p><i><u>(c) the activity is consistent with iwi management plan.</u></i></p> <p>AND</p> <p>Include the following notification note:</p> <p><i><u>Resource consent applications under this Rule will be notified to tangata whenua.</u></i></p>	<p>Decline</p> <p>The submitter has sought the inclusion of standards, terms and conditions for rules in the Plan relating to Discretionary activities.</p> <p>Officers decline the relief noting that it is not standard planning practice for Discretionary or Non-complying Activity rules to include standards, terms and conditions. Conditions relating to a Discretionary Activity are developed on a case-by-case basis through the consenting process having regard to the relevant Plan policies.</p> <p>Officers note that all matters identified by the submitter would be considered through the consenting process with Policies 1 to 21, 22, 39, 40, 41, 42, 43, 44 and 49 being given effect to. In particular, Policy 16 [Relationship with tangata whenua] will provide protections for areas of concern identified by the submitter.</p>
Further submissions – Te Rūnanga o Ngāti Mutunga (40), Te Korowai o Ngāruahine Trust (41), Te Atiawa (58)		Support	<p>In relation to notification requirements proposed by the submitter, officers note that the Plan is not intended to provide the operational detail for implementing every aspect of the Plan. Such detail is more appropriately included in the Council's standard operating procedures and/or any Mana Whakahono a Rohe agreements.</p>
Rule 57 – Beach replenishment			

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
29 – Department of Conservation	1094	Amend	Decline
		Submitter seeks amendment to Rule 57 of the Plan to read: <i>Deposition of natural <u>marine</u> material [...]</i> AND Include controls around particle size, and requirements for marine material similar to that of the receiving environment.	Officers agree that beach replenishment materials should be similar to the sediments that already existing in the natural receiving environment, however, this is a detail that would be addressed within the consenting process or a case-by-case basis and does not require mention within the rule itself.
40 – Te Rūnanga o Ngāti Mutunga	1095	Amend	Decline
		Submitter seeks amendment to Rule 57 of the Plan to include 2 additional conditions: <i>(c) the activity does not have an adverse effect on the values associated with historic heritage identified in Schedule 5 [Historic Heritage]</i> <i>(d) the 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.</i>	The submitter has sought the inclusion of standards, terms and conditions for a rule in the Plan that has a discretionary activity classification. Officers decline the relief noting that it is not standard planning practice for Discretionary Activity or Non-complying Activity rules to include standards, terms and conditions. Conditions relating to a Non-complying Activity are developed on a case-by-case basis through the consenting process having regard to the relevant Plan policies. Officers note that effects on species and ecosystems are provided for and protected under Policy 14 [Indigenous biodiversity] and will be required to be given effect through this rule by having regard for Policies 1 to 21, 22, 40, 41, 42, 44 and 49 being given effect to.
Further submissions – Te Korowai o Ngāruahine Trust (41)		Support	
41 – Te Korowai o Ngāruahine Trust	1096	Amend	Decline
		Submitter seeks amendment to Rule 57 of the Plan to acknowledge the role that kaitiaki play in wanting to protect areas of ecological value and biodiversity and sites of significance.	Officers recommend declining the relief sought by the submitter. Officers do not consider the rules to be an appropriate place to discuss the role of kaitiaki in wanting to protect areas of ecological value, biodiversity and sites of significance. Such matters have been addressed elsewhere in the Plan. Officers note that the rules are subject to the provisions within the policies and as such kaitiaki is already provided for within Policy 16 [Relationship of tangata whenua]. Thus, kaitiaki will have to be considered through this rule irrespective of whether it is explicitly mentioned or not and can be done so through iwi involvement in consents.
41 – Te Korowai o Ngāruahine Trust	1097	Amend	Decline
		Submitter seeks amendment to Rule 57 of the Plan to include standards, terms and conditions to ensure that the activities do not have any adverse effects on	The submitter has sought the inclusion of standards, terms and conditions for a rule in the Plan that has a discretionary activity classification.

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		species and ecosystems and do not impact on the values of the sites listed in Schedules 5A and B.	<p>Officers decline the relief noting that it is not standard planning practice for Discretionary Activity or Non-complying Activity rules to include standards, terms and conditions. Conditions relating to a Non-complying Activity are developed on a case-by-case basis through the consenting process having regard to the relevant Plan policies.</p> <p>Officers note that effects on species and ecosystems are provided for and protected under Policy 14 [Indigenous biodiversity] and will be subject to the activity obtaining a resource consent and giving effect to Policies 1 to 21, 22, 40, 41, 42, 44 and 49.</p>
43 – Royal Forest and Bird Protection Society	1098	Support	Accept
		Retain Rule 57 of the Plan as notified.	Support noted. Rule 57 is retained as notified.
Further submissions – Port Taranaki Ltd (32)		Support	
58 – Te Atiawa	1099	Amend	Decline
		<p>Submitter seeks amendment to Rule 57 of the Plan to include the following conditions:</p> <p><i><u>(a) 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], and;</u></i></p> <p><i><u>(b) the activity does not have an adverse effect on the values associated with sites of significance to Māori identified in Schedule 5A and 5B.</u></i></p>	<p>The submitter has sought the inclusion of standards, terms and conditions for a rule in the Plan that has a discretionary activity classification.</p> <p>Officers decline the relief noting that it is not standard planning practice for Discretionary Activity or Non-complying Activity rules to include standards, terms and conditions. Conditions relating to a Non-complying Activity are developed on a case-by-case basis through the consenting process having regard to the relevant Plan policies.</p> <p>Officers note that all matters identified by the submitter would be considered through the consenting process with Policies 1 to 21, 22, 40, 41, 42, 44 and 49 being given effect to. In particular, Policy 14 [Indigenous biodiversity] and Policy 15 [Historic heritage] will provide for the areas of concern raised by the submitter.</p>
61 – Te Rūnanga o Ngāti Ruanui Trust	1100	Amend	Decline
		<p>Submitter seeks amendment to Rule 57 of the Plan to include standards, terms and conditions to read:</p> <p><i><u>(a) the activity does not adversely affect the matters/values identified for protection by mana whenua in the cultural impact assessment;</u></i></p>	<p>The submitter has sought the inclusion of standards, terms and conditions for a rule in the Plan that has a Discretionary Activity classification.</p> <p>Officers decline the relief noting that it is not standard planning practice for Discretionary Activity or Non-complying Activity rules to include standards, terms and conditions. Conditions relating to a Discretionary Activity are developed on a</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		<p><u>(b) the activity complies with tangata whenua indicators referred to in the tangata whenua monitoring plan</u></p> <p><u>(c) the activity is consistent with iwi management plan.</u></p> <p>AND</p> <p>Include the following notification note:</p> <p><u>Resource consent applications under this Rule will be notified to tangata whenua.</u></p>	<p>case-by-case basis through the consenting process having regard to the relevant Plan policies.</p> <p>Officers note that all matters identified by the submitter would be considered through the consenting process with Policies 1 to 21, 22, 40, 41, 42, 44 and 49 being given effect to. In particular, Policy 16 [Relationship with tangata whenua] will provide protections for areas of concern identified by the submitter.</p> <p>In relation to notification requirements proposed by the submitter, officers note that the Plan is not intended to provide the operational detail for implementing every aspect of the Plan. Such detail is more appropriately included in the Council's standard operating procedures and or Mana Whakahono a Rohe agreements.</p>
Rule 58 – Introduction of exotic plants			
29 – Department of Conservation	1101	Support	Accept
		Retain Rule 58 of the Plan as notified.	Support noted. Rule 58 is retained as notified.
43 – Royal Forest and Bird Protection Society	1102	Support	Accept
		Retain Rule 58 of the Plan as notified.	Support noted. Rule 58 is retained as notified.
58 – Te Atiawa	1103	Other	No relief necessary
		Seek discussion with the Taranaki Regional Council with respect to the purpose of allowing the introduction of exotic plants into the coastal marine area.	Comments noted. Officers will seek to discuss the submitter's concerns through the pre-hearing consultation process. However, in the interim, officers note that the Rule framework recognises that the introduction of exotic plants into the coastal marine area would not generally be acceptable. Hence, the activity can only be authorised through the consenting process as a Discretionary Activity or a Non-complying Activity (depending upon the coastal marine area where the activity is proposed to occur).
Further submissions – Te Rūnanga o Ngāti Mutunga (40)		Support	
61 – Te Rūnanga o Ngāti Ruanui Trust	1104	Amend	Decline
		<p>Submitter seeks amendment to Rule 58 of the Plan to include standards, terms and conditions to read:</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 tangata whenua indicators referred to in the tangata whenua monitoring plan</u></p>	<p>The submitter has sought the inclusion of standards, terms and conditions for a rule in the Plan that has a Discretionary Activity classification.</p> <p>Officers decline the relief noting that it is not standard planning practice for Discretionary Activity or Non-complying rules to include standards, terms and conditions. Conditions relating to a Discretionary Activity are developed on a case-</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		<p><u>(c) the activity is consistent with iwi management plan.</u></p> <p>AND</p> <p>Include the following notification note:</p> <p><u>Resource consent applications under this Rule will be notified to tangata whenua.</u></p>	<p>by-case basis through the consenting process having regard to the relevant Plan policies.</p> <p>Officers note that all matters identified by the submitter would be considered through the consenting process with General Policies 1 to 21 and Activity-specific Policy 28 being given effect to. In particular, Policy 16 [Relationship with tangata whenua] would provide protections for areas of concern identified by the submitter.</p> <p>In relation to notification requirements proposed by the submitter, Officers note that the Plan is not intended to provide the operational detail for implementing every aspect of the Plan. Such detail is more appropriately included in the Council's standard operating procedures and or Mana Whakahono a Rohe agreements.</p>
Rule 59 – Introduction of exotic plants			
29 – Department of Conservation	1105	Support	Accept
		Retain Rule 59 of the Plan as notified.	Rule 59 retained as notified.
40 – Te Rūnanga o Ngāti Mutunga	1106	Support	Accept
		Retain Rule 59 of the Plan as notified.	Rule 59 retained as notified.
43 – Royal Forest and Bird Protection Society	1107	Amend	No relief necessary
		Submitter seek amendment to Rule 59 to give effect to the <i>New Zealand Coastal Policy Statement</i> .	<p>The submitter notes that the introduction of exotic plants is not consistent with protection or enhancement of natural character. In particular they are concerned about adverse effects on significant biodiversity values.</p> <p>Officers do not believe that relief is required. Officers agree with the submitter that the introduction of exotic plants in the coastal marine area is likely to degrade natural character. This has been recognised in the Plan whereby Rule 59 makes this activity a Non-complying Activity for which a resource consent would be required. Officers note that Non-complying Activity represents a very high level of regulatory protection whereby a resource consent cannot be granted unless the effects of the activity are minor and the activity is not contrary to the objectives and policies of the Plan.</p>
58 – Te Atiawa	1108	Support	Accept
		Submitter supports Rule 59 of the Plan as notified.	Support noted. Rule 59 retained as notified.
	1109	Amend	Decline

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
61 – Te Rūnanga o Ngāti Ruanui Trust		<p>Submitter seeks amendment to Rule 59 of the Plan to include standards, terms and conditions to read:</p> <p><i>(a) the activity does not adversely affect the matters/values identified for protection by mana whenua in the cultural impact assessment;</i></p> <p><i>(b) the activity complies with tangata whenua indicators referred to in the tangata whenua monitoring plan</i></p> <p><i>(c) the activity is consistent with iwi management plan.</i></p> <p>AND</p> <p>Include the following notification note:</p> <p><i>Resource consent applications under this Rule will be notified to tangata whenua.</i></p>	<p>The submitter has sought the inclusion of standards, terms and conditions for a rule in the Plan that has a non-complying activity classification.</p> <p>Officers decline the relief noting that it is not standard planning practice for Discretionary Activity or Non-complying rules to include standards, terms and conditions. Conditions relating to a Non-complying Activity are developed on a case-by-case basis through the consenting process having regard to the relevant Plan policies.</p> <p>Officers note that all matters identified by the submitter would be considered through the consenting process with Policies 1 to 21 and 28 being given effect to. In particular, Policy 16 [Relationship with tangata whenua] will provide protections for areas of concern identified by the submitter.</p> <p>In relation to notification requirements proposed by the submitter, officers note that the Plan is not intended to provide the operational detail for implementing every aspect of the Plan. Such detail is more appropriately included in the Council's standard operating procedures and or Mana Whakahono a Rohe agreements.</p>
Rule 60 – Other disturbance, damage, destruction, removal or deposition			
26 – Transpower NZ Ltd	1110	<p>Amend</p> <p>Submitter supports Rule 60 of the Plan but seeks amendment to Rule to delete reference to National Environmental Standards for Electricity Transmission Activities:</p> <p><i>[...] or the Resource Management (National Environmental Standards for Electricity Transmission Activities Regulations 2009 (Appendix 6)).</i></p>	<p>Accept</p> <p>The reference to the <i>National Environmental Standards for Electricity Transmission</i> is redundant and does not add further value to the Plan. Officers recommend granting the relief sought by the submitter.</p>
40 – Te Rūnanga o Ngāti Mutunga	1111	<p>Amend</p> <p>Submitter seeks amendment to Rule 60 of the Plan to make disturbance, damage, destruction, removal or deposition of the foreshore and seabed a Non-complying Activity in Estuary Modified, Open Coast and Port coastal management areas (i.e. all coastal management areas).</p>	<p>Decline</p> <p>Discretionary classifications provide a high level of regulatory protection and officers do not consider it appropriate to preclude this activity across coastal management areas already modified by coastal activities without determining the scale and possible effects as would be determined on a case-by-case basis through the consenting process.</p>
Further submissions – Trans-Tasman Resources Ltd (6)		Oppose	
Further submissions – Climate Justice Taranaki Inc (21)		Support	

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
43 – Royal Forest and Bird Protection Society	1112	Amend	No relief necessary
		Submitter seeks amendment to Rule 60 of the Plan to give effect to the <i>New Zealand Coastal Policy Statement</i> .	The submitter suggests that these activities can have significant adverse effects on indigenous biodiversity and natural character not identified in the Plan. The submitter seeks amendments to Plan policies to give effect to the <i>New Zealand Coastal Policy Statement</i> and believes amendments are necessary to provide for this activity as a Discretionary Activity. Officers note that the submitters concerns regarding indigenous biodiversity and natural character are provided for within the Plan in Policy 9 [Natural character and natural features and landscapes] and Policy 14 [Indigenous biodiversity] and that rule 60 must give effect to the relevant policies including all of the General Policies as indicated in the Policy reference column. It is officers' view that the requirements of the <i>New Zealand Coastal Policy Statement</i> have been fulfilled through the Proposed Plan and suggested amendments to the Proposed Plan (addressed elsewhere in this report).
47 – Fonterra	1113	Support	Accept
Further submissions – Port Taranaki Ltd (32)		Retain Rule 60 of the Plan as notified.	Rule 60 retained as notified
58 – Te Atiawa	1114	Amend	Decline
Further submissions – Trans-Tasman Resources Ltd (6), Department of Conservation (29)		Submitter seeks amendment to Rule 60 of the Plan to change the activity classification to Non-complying (currently Discretionary Activity) for the Estuaries Modified and the Open Coast coastal management areas.	Officers do not consider it appropriate to further restrict this activity in the Estuaries Modified and the Open Coast coastal management areas. As a Discretionary Activity a resource consent is required and, through the consenting process, any application for disturbance activities on the foreshore or seabed can be fully considered.
Further submissions – Climate Justice Taranaki Inc (21)		Oppose	
61 – Te Rūnanga o Ngāti Ruanui Trust	1115	Amend	Decline
Further submissions – Climate Justice Taranaki Inc (21)		Submitter seeks amendment to Rule 60 of the Plan to include standards/terms/conditions to read:	The submitter has sought the inclusion of standards, terms and conditions for rules in the Plan relating to discretionary and non-complying activities.

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		<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 tangata whenua indicators referred to in the tangata whenua monitoring plan</u></p> <p><u>(c) the activity is consistent with iwi management plan.</u></p> <p>AND</p> <p>Include the following notification note:</p> <p><u>Resource consent applications under this Rule will be notified to tangata whenua.</u></p>	<p>Officers decline the relief noting that it is not standard planning practice for Discretionary Activity or Non-complying rules to include standards, terms and conditions. Conditions relating to a Discretionary Activity are developed on a case-by-case basis through the consenting process having regard to the relevant Plan policies.</p> <p>Officers note that all matters identified by the submitter would be considered through the consenting process with Policies 1 to 21, 39, 40, 41, 42 and 44 being given effect to. In particular, Policy 16 [Relationship with tangata whenua] will provide protections for areas of concern identified by the submitter.</p>
Further submissions – Trans-Tasman Resources Ltd (6)		Oppose	In relation to notification requirements proposed by the submitter, officers note that the Plan is not intended to provide the operational detail for implementing every aspect of the Plan. Such detail is more appropriately included in the Council's standard operating procedures and or Mana Whakahono a Rohe agreements.
Rules 60 and 61 - Other disturbance, damage, destruction, removal, or deposition that is not provided for in Rules 51 to 59			
6 – Trans-Tasman Resources Ltd	1116	<p>Support</p> <p>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).</p>	<p>Accept</p> <p>Support noted. Rules 60 and 61 are retained with minor amendment to Rule 61 to remove the reference to the <i>Resource Management (National Environmental Standards for Electricity Transmission Activity Regulations 2009 (Appendix 6))</i>.</p>
Further submissions – Port Taranaki Ltd (32)		Support	
21 – Climate Justice Taranaki	1117	<p>Amend</p> <p>Submitter 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.</p>	<p>Decline</p> <p>Officers note that Non-complying Activity is already a very high level of regulatory protection whereby a resource consent cannot be granted unless the effects of the activity are minor and the activity is not contrary to the objectives and policies of the Plan. Of note the policies themselves are very prescriptive and that it is necessary to give effect to all policies recognised in the policy reference column, namely General Policies 1 – 21 and Activity-based policies 39, 40, 41, 42 and 44.</p>
Further submissions – Trans-Tasman Resources Ltd (6)		Oppose	Officers do not believe it is appropriate to preclude any consideration of an activity being considered without first determining the possible effects.
Further submissions – Climate Justice Taranaki Inc (21), Te Rūnanga o Ngāti Mutunga (40), Te Ahiawa (58)		Support	

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Rule 61 - Other disturbance, damage, destruction, removal, or deposition that is not provided for in Rules 51 to 59 (Outstanding Value, Estuaries Unmodified)			
26 – Transpower NZ Ltd	1118	Amend	Accept
		Submitter supports Rule 61 but seeks amendment to Rule to delete reference to National Environmental Standards for Electricity Transmission Activities: <i>[...] or the Resource Management (National Environmental Standards for Electricity Transmission Activities Regulations 2009 (Appendix 6))-</i>	The reference to the <i>National Environmental Standards for Electricity Transmission</i> is redundant and does not add further value to the Plan. Officers recommend granting the relief sought by the submitter.
58 – Te Atiawa	1119	Support	Accept
		Retain Rule 61 as notified.	Support noted. Rule 61 is retained with minor amendment to remove the reference to the <i>Resource Management (National Environmental Standards for Electricity Transmission Activity Regulations 2009 (Appendix 6))</i> .
61 – Te Rūnanga o Ngāti Ruanui Trust	1120	Amend	Decline
		Submitter seeks amendment to Rule 61 of the Plan to include standards, terms and conditions to read: <i>(a) the activity does not adversely affect the matters/values identified for protection by mana whenua in the cultural impact assessment;</i> <i>(b) the activity complies with tangata whenua indicators referred to in the tangata whenua monitoring plan</i> <i>(c) the activity 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>	The submitter has sought the inclusion of standards/terms/conditions for rules in the Plan relating to discretionary and non-complying activities. Officers decline the relief noting that it is not standard planning practice for Discretionary Activity or Non-complying Activity rules to include standards, terms and conditions. Conditions relating to a Non-complying Activity are developed on a case-by-case basis through the consenting process having regard to the relevant Plan policies. Officers note that all matters identified by the submitter would be considered through the consenting process with Policies 1 to 21, 39, 40, 41, 42 and 44 being given effect to. In particular, Policy 16 [Relationship with tangata whenua] will provide protections for areas of concern identified by the submitter.
Further submissions – Trans-Tasman Resources Ltd (6)		Oppose	In relation to notification requirements proposed by the submitter, officers note that the Plan is not intended to provide the operational detail for implementing every aspect of the Plan. Such detail is more appropriately included in the Council's standard operating procedures and or Mana Whakahono a Rohe agreements.
NEW Rule 61A – Other disturbance, damage, destruction, removal or deposition associated with the National Grid			
	1121	Amend	Decline

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
26 – Transpower NZ Ltd		<p>Submitter seeks amendment to the Plan to include a new rule that provides for Regionally Important Infrastructure (or specific to the National Grid) and reads as follows:</p> <p><u><i>Rule 61A - Discretionary Activity</i></u></p> <p><u><i>Coastal management areas: Outstanding Value; Estuaries Unmodified</i></u></p> <p><u><i>Other disturbance, damage, destruction, removal or deposition associated with Regionally Significant Infrastructure (or the National Grid) and any associated works:</i></u></p> <p><u><i>(a) removal of sand, shell, shingle or other natural material; or</i></u></p> <p><u><i>(b) deposition of material in, on or under the foreshore or seabed</i></u></p> <p><u><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 1998 (Appendix 5).</i></u></p>	<p>Officers recommend declining the relief sought by the submitter.</p> <p>Officers do not believe it necessary to have a new 'catch-all' rule for disturbance activities on the seafloor and seabed (not otherwise provided for in Rules 51 to 59) addressing regionally important infrastructure in Outstanding Value and Estuaries Unmodified coastal management areas.</p> <p>Officers note that applications for a resource consent for Regionally Important Infrastructure may still be considered under Rule 61 as a Non-complying Activity. While officers recognise that Non-complying Activities represent a very high level of regulatory protection, this level of protection is considered appropriate due to the exceptional/significant values in these areas. Officers note that a resource consent can still be granted where the effects of the activity are less than minor and the activity is not contrary to the objectives and policies of the Plan.</p>
Further submissions – Department of Conservation (29), Royal Forest and Bird Protection Society (43)		Oppose	
Further submissions – Te Rūnanga o Ngāti Mutunga (40), Te Atiawa (58)		Oppose (seek clarification)	
Rule 62 - Reclamation or drainage for erosion and flood control within areas of outstanding coastal value and unmodified estuaries			
29 – Department of Conservation	1122	<p>Support</p> <p>Retain Rule 62 of the Plan as notified.</p>	<p>Accept</p> <p>Support noted. Rule 62 retained as notified.</p>
61 – Te Rūnanga o Ngāti Ruanui Trust	1123	<p>Amend</p> <p>Submitter seeks amendment to Rule 62 of the Plan to include standards, terms and conditions to read:</p> <p><u><i>(a) the activity does not adversely affect the matters/values identified for protection by mana whenua in the cultural impact assessment;</i></u></p> <p><u><i>(b) the activity complies with tangata whenua indicators referred to in the tangata whenua monitoring plan</i></u></p> <p><u><i>(c) the activity is consistent with iwi management plan.</i></u></p> <p>AND</p>	<p>Decline</p> <p>The submitter has sought the inclusion of standards/terms/conditions for rules in the Plan relating to discretionary and non-complying activities.</p> <p>Officers decline the relief noting that it is not standard planning practice for Discretionary Activity or Non-complying rules to include standards, terms and conditions. Conditions relating to a Non-complying Activity are developed on a case-by-case basis through the consenting process having regard to the relevant Plan policies as detailed in the Policy reference column. In this instance, this includes all the General Policies 1 to 21 as well as activity-based policies 22, 39, 40, 41, 42, 44, 45, 46, 49.</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		<p>Include the following notification note:</p> <p><i><u>Resource consent applications under this Rule will be notified to tangata whenua.</u></i></p>	<p>Officers note that all matters identified by the submitter would be considered through the consenting process by giving effect to the above policies.</p> <p>In relation to notification requirements proposed by the submitter, officers note that the Plan is not intended to provide the operational detail for implementing every aspect of the Plan. Such detail is more appropriately included in the Council's standard operating procedures and/or Mana Whakahono a Rohe agreements.</p>
Rule 63 – Other reclamation or drainage that is not provided for in Rule 62 (Estuaries Modified, Open Coast, Port)			
29 – Department of Conservation	1124	<p>Support</p> <p>Retain Rule 63 of the Plan as notified.</p>	<p>Accept</p> <p>Support noted</p>
Further submissions – Port Taranaki Ltd (32)		Support	
40 – Te Rūnanga o Ngāti Mutunga	1125	<p>Amend</p> <p>Submitter seeks amendment to Rule 63 of the Plan to include 2 additional conditions:</p> <p><i><u>(a) the activity does not have an adverse effect on the values associated with historic heritage identified in Schedule 5 (Historic Heritage)</u></i></p> <p><i><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 ecosystem type including those identified in Schedule 4A.</u></i></p>	<p>Decline</p> <p>Officers recommend to decline the relief requested by the submitter as rules with a Discretionary Activity classification do not include standards, terms or conditions as they are determined on a case-by-case basis through the consenting process. Officers note that the activity will be required to give effect to the relevant policies, namely General Policies 1 to 21 and Activity-based Policies 45 and 46. The submitter's concerns regarding historic heritage and biodiversity will be explicitly considered and addressed when giving effect to Policy 14 [indigenous biodiversity] and Policy 15 [historic heritage].</p>
41 – Te Korowai o Ngāruahine Trust	1126	<p>Amend</p> <p>Submitter seeks amendment to Rule 63 of the Plan to acknowledge the role that kaitiaki play in wanting to protect areas of ecological value and biodiversity and sites of significance.</p>	<p>Decline</p> <p>Officers recommend declining the relief sought by the submitter.</p> <p>Officers do not consider the rules to be an appropriate place to discuss the role of kaitiaki in wanting to protect areas of ecological value, biodiversity and sites of significance. Such matters have been addressed elsewhere in the Plan. Officers note that the rules are subject to the provisions within the policies and as such kaitiaki is already provided for within Policy 16 [Relationship of tangata whenua]. Thus, kaitiaki will have to be considered through this Rule irrespective of whether it is explicitly mentioned or not and can be done so through iwi involvement in consents.</p>
	1127	Amend	Decline

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
41 – Te Korowai o Ngāruahine Trust		Submitter seeks amendment to Rule 63 of the Plan to include conditions to ensure that the activities do not have any adverse effects on species and ecosystems and do not impact on the values of the sites listed in Schedules 5A and B.	It is not standard planning practice for Discretionary and Non-complying Activities to contain standards, terms or conditions. These considerations are addressed through the consenting process on a case-by-case basis by giving effect to the relevant policies (1 to 21 and 47). Officers note that Policy 14 [Indigenous biodiversity] provides protections for regionally important species and ecosystems and Policy 15 [Historic heritage] provides protections for the values of sites listed in Schedules 5A and 5B. Officers recommend declining the requested relief as it is an operational level of detail that is not required within the rules section of the Plan.
58 – Te Atiawa	1128	<p>Amend</p> <p>Submitter seeks amendment to Rule 63 of the Plan to include the following conditions:</p> <p><i><u>(a) 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], and;</u></i></p> <p><i><u>(b) the activity does not have an adverse effect on the values associated with sites of significance to Māori identified in Schedule 5A and 5B.</u></i></p>	<p>Decline</p> <p>The submitter has sought the inclusion of standards, terms and conditions for rules in the Plan relating to Discretionary Activities.</p> <p>Officers decline the relief noting that it is not standard planning practice for Discretionary Activity or Non-complying Activity rules to include standards, terms and conditions. Conditions relating to a Non-complying Activity are developed on a case-by-case basis through the consenting process having regard to the relevant Plan policies.</p> <p>Officers note that all matters identified by the submitter would be considered through the consenting process with Policies 1 to 21, 22, 39, 40, 41, 42, 44, 45, 46 and 49 being given effect to.</p> <p>In relation to notification requirements proposed by the submitter, officers note that the Plan is not intended to provide the operational detail for implementing every aspect of the Plan. Such detail is more appropriately included in the Council's standard operating procedures and or Mana Whakahono a Rohe agreements.</p>
61 – Te Rūnanga o Ngāti Ruanui Trust	1129	<p>Amend</p> <p>Submitter seeks amendment to Rule 63 of the Plan to include standards, terms and conditions to read:</p> <p><i><u>(a) the activity does not adversely affect the matters/values identified for protection by mana whenua in the cultural impact assessment;</u></i></p> <p><i><u>(b) the activity complies with tangata whenua indicators referred to in the tangata whenua monitoring plan</u></i></p> <p><i><u>(c) the activity is consistent with iwi management plan.</u></i></p> <p>AND</p>	<p>Decline</p> <p>The submitter has sought the inclusion of standards, terms and conditions for rules in the Plan relating to discretionary activities.</p> <p>Officers decline the relief noting that it is not standard planning practice for Discretionary Activity or Non-complying Activity rules to include standards, terms and conditions. Conditions relating to a Non-complying Activity are developed on a case-by-case basis through the consenting process having regard to the relevant Plan policies.</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		<p>Include the following notification note:</p> <p><i>Resource consent applications under this Rule will be notified to tangata whenua.</i></p>	<p>Officers note that all matters identified by the submitter would be considered through the consenting process with Policies 1 to 21, 22, 39, 40, 41, 42, 44, 45, 46 and 49 being given effect to.</p> <p>In relation to notification requirements proposed by the submitter, officers note that the Plan is not intended to provide the operational detail for implementing every aspect of the Plan. Such detail is more appropriately included in the Council's standard operating procedures and or Mana Whakahono a Rohe agreements.</p>
Rule 64 – Other reclamation or drainage that is not provided for in Rule 62 (Outstanding Value, Estuaries Unmodified)			
29 – Department of Conservation	1130	Support	Accept
		Retain Rule 64 of the Plan as notified.	Support noted.
40 – Te Rūnanga o Ngāti Mutunga	1131	Support	Accept
		Retain Rule 64 of the Plan as notified.	Support noted.
43 – Royal Forest and Bird Protection Society	1132	Support	Accept
		Retain Rule 64 of the Plan as notified.	Support noted.
58 – Te Atiawa	1133	Support	Accept
		Retain Rule 64 of the Plan as notified.	Support noted.
Rule 65 – Taking or use of water, heat or energy			
6 – Trans-Tasman Resources Ltd	1134	Support	Accept
		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 noted.
		Support	
Further submissions – Port Taranaki Ltd (32)		Support	
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Oppose	
	1135	Amend	Decline

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
40 – Te Rūnanga o Ngāti Mutunga		Submitter seeks amendment to Rule 65 of the Plan to exclude coastal management area Outstanding Value from the rule.	Officers recommend declining the relief sought by the submitter. Officers are not aware of any limit that is likely to result in sea level dropping, prevent the availability of coastal water for other uses and values, and or have noticeable effects on natural character, features and landscapes.
40 – Te Rūnanga o Ngāti Mutunga	1136	Amend Submitter seeks amendment to Rule 65 by including a new standard, term and condition (and impose a limit) on the quantity of water that can be taken and to read as follows: <i>(c) taking or use of water is not at a quantity or rate that would cause adverse environmental effects.</i>	Accept Officers are not aware of any limit that is likely to result in sea level dropping or prevent the availability of coastal water for other uses and values. Notwithstanding that, as part of a precautionary approach, officers recommend granting the relief sought noting that the new Condition is consistent with Policy 47 of the Plan.
Further submissions – Trans-Tasman Resources Ltd (6)		Oppose	
Further submissions – Te Korowai o Ngāruahine Trust (41)		Support	
41 – Te Korowai o Ngāruahine Trust	1137	Amend Submitter seeks amendment to Condition (b) of Rule 65 of the Plan to read: <i>(b) activity does not have an adverse effect on the values associated with historic heritage identified in Schedule 5A and B. Historic heritage:[...]</i>	Accept Officers recommend granting the relief sought by the submitter.
43 – Royal Forest and Bird Protection Society	1138	Amend Submitter seeks amendment to Rule 65 of the Plan by incorporating previous reliefs sought in relation to indigenous biodiversity.	Decline Officers note that Rule 65 already includes a condition specifically addressing indigenous biodiversity and no further changes. It is unclear what amendments are sought by the submitter to the rule noting that previous reliefs sought in other provisions will be addressed elsewhere.
Further submissions – Te Korowai o Ngāruahine Trust (41)		Support	
33 - New Zealand Defence Force	1139	Amend Submitter seeks amendment to Rule 65 of the Plan to determine a limit on quantity and/or rate of water take, or otherwise amend to ensure consistency with Policy 47.	Accept Officers are not aware of any limit that is likely to result in sea level dropping or prevent the availability of coastal water for other uses and values. Notwithstanding that, as part of a precautionary approach, officers recommend granting the relief sought by amending Rule 65 to include a new condition that is consistent with Policy 47 of the Plan.
Further submissions – Trans-Tasman Resources Ltd (6)		Oppose	

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
58 – Te Atiawa	1140	Amend	Decline
		Submitter seeks amendment to Rule 65 of the Plan by removing areas of Outstanding Value from the coastal management area.	Officers recommend declining the relief sought by the submitter. Outstanding areas includes substantial areas of the Open Coast which are unlikely to be impacted upon by any takes of water from the coastal marine area. Notwithstanding that, as part of a precautionary approach, Rule 65 of the Plan does not apply to estuaries and standards, terms and conditions apply to ensure no adverse effects on significant indigenous biodiversity, historic heritage, and surf breaks.
Further submissions – Trans-Tasman Resources Ltd (6)		Oppose	
58 – Te Atiawa	1141	Amend	Accept
		Submitter seeks amendment to Rule 65 of the Plan by adding a new standard, term and condition setting a water take limit.	Officers are not aware of any limit that is likely to result in sea level dropping or prevent the availability of coastal water for other uses and values. Notwithstanding that, in response to reliefs sought by other submitters officers have included a new condition that reads as follows: <i><u>(ca) the taking or use of water is not at a quantity or rate that would cause adverse environmental effects</u></i>
Further submissions – Trans-Tasman Resources Ltd (6)		Oppose	
Further submissions – Te Rūnanga o Ngāti Ruanui Trust (61)		Support	
60 – Te Kaahui o Rauru	1142	Amend	Decline
		Submitter seeks amendment to Rule 65 of the Plan to notify Te Kaahui o Rauru of this kind of activity, especially in regards to the scale and timing of the activity.	Rule 65 is for permitted water take activities and the Council does not require notification for Permitted Activities. Officers further note that the Plan is not intended to provide the operational detail for implementing every aspect of the Plan. Such detail is more appropriately included in the Council's standard operating procedures and/or any Mana Whakahono a Rohe agreements.
Further submissions – Trans-Tasman Resources Ltd (6)		Oppose	
61 – Te Rūnanga o Ngāti Ruanui Trust	1143	Amend	Accept in part
		Submitter seeks amendment to Rule 65 of the Plan to include new and amended standards, terms and conditions to read: [...] <i>(b) the activity does not have an adverse effect on the values associated with <u>cultural and historic heritage identified in Schedule 5 [Cultural and Historic heritage];</u></i> <i>(c) the activity does not have adverse effect on Schedules 1 and 2;</i>	The submitter is seeking amendment to Rule 65 of the Plan to include new and amended standards, terms and conditions. Specific comments on the new and amended proposed conditions are as follows: <ul style="list-style-type: none"> decline the relief sought in relation to Condition (b). Officers refer the submitter to previous comments made on expanding the scope of historic heritage

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		<p><u><i>(d) 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;</i></u></p> <p><u><i>(e) the activity does not adversely affect the suitability of the receiving environment for customary use;</i></u></p> <p><u><i>(f) the 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] and taonga species protected under Taranaki iwi Deed of Settlement including those identified in Schedule 4C [Taonga species and habitat]</i></u></p> <p><u><i>(g) activity complies with the general standards in Section 8.6 [...]</i></u></p>	<ul style="list-style-type: none"> decline the relief sought in relation to Condition (c). Officers note that the effect of granting this relief would also make this rule redundant as Schedules 1 and 2 capture the whole coastal marine area plus landward parts of the coastal environment identified as having outstanding natural character or being an outstanding natural feature or landscape and it requires no adverse effects (even those less than minor or transitory) decline the relief sought in relation to Condition (c) and (e) noting that such matters are already addressed under Condition (b) and a new condition addressing taonga species grant the relief in kind in relation to Condition (f). Officers recommend expanding the scope of Rule conditions to include reference to scheduled taonga species.
Further submissions – Trans-Tasman Resources Ltd (6)	Oppose		
Further submission – Te Korowai o Ngāruahine Trust (41)	Support		
Rule 66 – Taking or use of water, heat or energy			
40 – Te Rūnanga o Ngāti Mutunga	1144	<p>Amend</p> <p>Submitter seeks amendment to Rule 66 of the Plan to include standards, terms and conditions to read:</p> <p><u><i>(a) the activity does not have an adverse effect on the values associated with historic heritage identified in Schedule 5 [Historic Heritage]</i></u></p> <p><u><i>(b) the 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</i></u></p> <p><u><i>(c) Taking or use of water is not at a quantity or rate that would cause adverse environmental effects.</i></u></p>	<p>Decline</p> <p>The submitter has sought the inclusion of standards/terms/conditions for rules in the Plan relating to discretionary activities.</p> <p>Officers decline the relief noting that it is not standard planning practice for Discretionary Activity or Non-complying Activity rules to include standards, terms and conditions. Conditions relating to a Discretionary Activity are developed on a case by case basis through the consenting process having regard to the relevant Plan policies.</p> <p>Officers note that all matters identified by the submitter would be considered through the consenting process with Policies 1 to 21, 22, 39, 40, 41, 42, 44, 45, 46 and 49 being given effect to. In particular, Policy 16 [Relationship with tangata whenua] will provide protections for areas of concern identified by the submitter.</p> <p>In relation to notification requirements proposed by the submitter, officers note that the Plan is not intended to provide the operational detail for implementing every aspect of the Plan. Such detail is more appropriately included in the Council's standard operating procedures and/or Mana Whakahono a Rohe agreements.</p>
58 – Te Atiawa	1145	<p>Amend</p>	<p>Decline</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		Submitter seeks amendment to Rule 66 of the Plan by removing areas of Outstanding Value, Estuaries Unmodified and Estuaries Modified from the coastal management area.	Officers recommend declining the relief sought by the submitter. Officers note that Rule 66 specifically addresses, amongst other things, the taking and use of water, heat and energy from estuaries.
58 – Te Atiawa	1146	Amend	Decline
		Submitter seeks amendment to Rule 66 of the Plan by adding a new standard, term and condition setting a water take limit.	Officers recommend declining the relief sought by the submitter. Officers decline the relief noting that it is not standard planning practice for Discretionary Activity or Non-complying Activity rules to include standards, terms and conditions. Conditions relating to a Non-complying Activity are developed on a case-by-case basis through the consenting process having regard to the relevant Plan policies. Notwithstanding the above, officers note that the setting of any limit relating to a coastal water take will be determined through the consenting process on a case-by-case basis taking into consideration the relevant policies and the nature of the activity.
61 – Te Rūnanga o Ngāti Ruanui Trust	1147	Amend	Decline
		Submitter seeks amendment to Rule 66 of the Plan to include standards, terms and conditions to read: <i>(a) the activity does not adversely affect the matters/values identified for protection by mana whenua in the cultural impact assessment;</i> <i>(b) the activity complies with tangata whenua indicators referred to in the tangata whenua monitoring plan</i> <i>(c) the activity 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>	The submitter has sought the inclusion of standards/terms/conditions for rules in the Plan relating to discretionary and non-complying activities. Officers decline the relief noting that it is not standard planning practice for Discretionary Activity or Non-complying Activity rules to include standards, terms and conditions. Conditions relating to a Non-complying Activity are developed on a case-by-case basis through the consenting process having regard to the relevant Plan policies. Officers note that all matters identified by the submitter would be considered through the consenting process with Policies 1 to 21 and 47 being given effect to. In particular, Policy 16 [Relationship with tangata whenua] will provide protections for areas of concern identified by the submitter. In relation to notification requirements proposed by the submitter, officers note that the Plan is not intended to provide the operational detail for implementing every aspect of the Plan. Such detail is more appropriately included in the Council's standard operating procedures and/or any Mana Whakahono a Rohe agreements.
Rules 1 to 66			
28 – Grant Knuckey	1148	Amend	Decline

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		Amend Rules 1 to 66, as appropriate, to identify/address two new marine spatial management areas – Wahi Tapu Areas and Wahi Taonga Areas.	Officers recommend declining the relief sought by the submitter. Refer to submission point 1295 for further information.
Further submissions – Trans-Tasman Resources Ltd (6)		Oppose	
Further submissions – Ministry for Primary Industries (16)		Oppose in part	
50 – Te Kāhui o Taranaki Trust	1149	Amend Submitter seeks amendment to all rules in Section 8 of the Plan to provide a new standard/term/condition to read: <i>[...] the activity does not adversely impact on Māori cultural values [...]</i>	Decline All of the rules are subject to the policies within the Plan. Māori cultural values are recognised and provided for in Policy 16 [Relationship of tangata whenua] where it states: <i>Recognise and provide for the relationship of tangata whenua culture, values and traditions within the coastal environment [...]</i> It is unnecessary to reiterate provisions within the Plan where they already apply and officers note that activities will be subject to meeting the requirements of all of the General Policies as well as the relevant Activity-based Policies when being considered through the resource consenting process.
Further submissions – Trans-Tasman Resources (6)		Oppose	
General Standards			
43 – Royal Forest and Bird Protection Society	1150	Amend Submitter seeks amendment to General Standards to include limits for permitted activities for: <ul style="list-style-type: none"> foreshore and seabed disturbance, vegetation disturbance and removal limits on sediment disturbance and resulting sediment plumes time periods to avoid removal or disturbance of vegetation during fish spawning to protect eggs until hatching other limits to avoid adverse effects consistent with Policies 13, 14 and 15 of the NZCPS, and ensure that any other adverse effects are no more than minor. 	Decline The requests of the submitter are already addressed within the rules under rules relating the disturbance, deposition and extraction and therefore do not require further iteration within the general standards. In addition, the concerns regarding disturbance of vegetation seems to be a matter concerned with the terrestrial environment and not within the coastal marine area, therefore, not relevant to this particular Plan.
General standards 8.6.2 – Light			

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
43 – Royal Forest and Bird Protection Society	1151	<p>Amend</p> <p>Submitter seeks amendment to General Standard 8.6.2 [Lights] of the Plan to include:</p> <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. 	<p>Decline</p> <p>Officers recommend declining this relief sought by the submitter and note the following:</p> <ul style="list-style-type: none"> General standard 8.6.2 already states that light sources will be shielded except for navigational aids and lights required under the Acts of Parliament. For navigational aids, a shielded light would lessen its effective over long distances and result in higher risks to vessels within the coastal marine area. A further consideration is that light colour is an important identifier of hazards and vessel pathways. Specific colours are required to comply with international regulations and standards. Lights in the coastal marine area are largely used for navigation and safety. As they are in the coastal marine area (and not on land) impacts on penguin breeding areas is likely to be minimal. Navigational aids ensure the safe passage of vessels within the coastal marine area and avoid incidents at sea, which, in turn are likely to have a much more significant impacts on seabirds and other marine life, e.g. marine oil spills.
Further submissions – Port Taranaki Ltd (32)		Oppose	
60 – Te Kaahui o Rauru	1152	<p>Amend</p> <p>Submitter seeks amendment to General Standard 8.6.2 [Lights] of the Plan to include a limit for biodiversity impacts.</p>	<p>Decline</p> <p>Officers recommend declining the relief sought by the submitter.</p> <p>Officers note that biodiversity impacts will be considered through the consenting process on a case-by-case basis. Officers note that lighting is an important tool for effective and safe movement of vessels within the coastal marine area and in most instances, the benefits of correct lighting will outweigh any adverse effects caused by their use. An example of an adverse effect occurring as a result of incorrect lighting would be a ship wreck or collision causing an oil spill. The adverse effects of such an incident may be higher for biodiversity than the correct operation of navigational aids and lighting within the coastal marine area.</p>
General standards 8.6.3 – Noise			
9 – Karen Pratt	1153	Other	No relief necessary

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		Note that the noises limits written in the General Standards for noise would not be able to be complied with should an operation the size of the recently permitted ironsand mining occur in the territorial waters.	Comments noted
Further submissions – Trans-Tasman Resources Ltd (6)		Oppose	
32 – Port Taranaki	1154	Support Retain the noise provisions in the Plan based on implementation of the Port Noise Standard and alignment between the New Plymouth District Plan and the Proposed Coastal Plan provisions as each go through their respective review processes.	Accept Support noted. General Standards 8.6.3 is retained as notified.
33 – New Zealand Defence Force	1155	Amend Submitter seeks amendment to General Standard 8.6.2(c) of the Plan by removing the provisions within general standards and replacing with standards prepared by the New Zealand Defence Force specifically for temporary military training activities (NZDF standards provided with submission).	Decline Officers recommend declining the relief sought by the submitter. Note that as part of this Plan review, the Council has undertaken further work and sought to better align noise provisions with equivalent provisions arising from the New Plymouth district plan review. Officers believe the proposed noise limits are appropriate for a Permitted Activity.
37 – Petroleum Exploration and Production Association of NZ	1156	Other Submitter note the noise limits under (d) from 10pm to 7am is now 40dB LAeq, while under the current Coastal Plan the limit is 45 dBA L10 but are unaware of any issues warranting the proposed stricter condition.	No relief necessary Note that as part of this Plan review, the Council has undertaken further work and sought to better align noise provisions with equivalent provisions arising from the New Plymouth district plan review.
43 – Royal Forest and Bird Protection Society	1157	Amend Submitter seeks amendment to General Standard 8.6.2 [Noise] of the Plan to 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 that reads as follows (or similar): <u><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></u>	Decline Officers recommend declining the relief sought by the submitter. Officers are concerned that references to the “latest information” and “most recent professionally supported noise modelling for the marine environment” does not provide sufficient clarity for Plan users and is ambiguous. Further, there is often a level of division amongst the scientific community within any area of research, and therefore, may be difficult to determine a “professionally supported” noise model. Another problem with taking the “most recent” information is that it is likely that it will not have had sufficient time to be reviewed or confirmed through peer review.

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Further submissions – Trans-Tasman Resources Ltd (6)		Oppose	Officers note that the General Standards only apply where a rule explicitly states that the standards apply. Activities to which these General Standards apply have been assessed as generally having less than minor adverse effects.
48 – Taranaki District Health Board	1158	Support	Accept
		Retain General Standards 8.6.3(a), (b) and (c) [Noise] of the Plan as notified.	Support noted. General Standards 8.6.3(a), (b) and (c) are retained as notified subject to minor amendments provided for in submission point 1159 below.
48 – Taranaki District Health Board	1159	Amend	Accept
		Submitter seeks amendment to General Standards 8.6.3(a), (b) and (c) [Noise] of the Plan to read: <i>Noise generated by any other activity in the coastal marine area (excluding those in (a), (b) and (c) above) shall not exceed the following at any point landward of at or beyond the boundary of the coastal marine area: [...]</i>	The amendment retains the intention of the clause but contains language that is more directive and commonly understood. Officers recommend granting the relief sought by the submitter.

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3.6 Financial contributions, monitoring and review

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Section 9 – Financial contributions			
15 – Surfbreak Protection Society	1160	<p>Other</p> <p>Submitter notes that the use of economic instruments to mitigate adverse effects to surf breaks could be problematic and that surf breaks are finite. Currently there are no manmade structures that can produce surf breaks and suggests that it is imperative that existing breaks should be given a high priority of protection.</p>	<p>No relief necessary</p> <p>Comments noted. Policy 19 provides strong direction and guidance on the protection of surf breaks.</p> <p>Officers agree that surf breaks are finite and that for some values such as surf breaks economic instruments are not necessarily the most appropriate response to avoiding, remedying or mitigating any adverse effects arising from use and development in the coastal marine area. However, economic instruments may be an option for offsetting some adverse effects (where that is appropriate).</p> <p>Economic instruments are implemented only in accordance with Section 9 of the Plan and relevant policies and when other avoidance, mitigation and remedial options have been exhausted.</p>
29 – Department of Conservation	1161	<p>Amend</p> <p>Submitter seeks amendment to Section 9 of the Plan to include a statement that states consideration of whether a coastal occupation charging regime is included in the Plan.</p>	<p>Accept</p> <p>The Council will not be operating a coastal occupation charging regime. Under section 64A [Imposition of coastal occupation charges] of the RMA, the Council must include a statement must be included to explain this. Therefore, officers recommend amending Section 9 to include the following statement:</p> <p><i>Note: The Council is not operating a charging regime for occupation of the coastal area.</i></p>
32 – Port Taranaki	1162	<p>Amend</p> <p>Retain Section 9 of the Plan but seek amendment of the heading of Section 9 of the Plan to read:</p> <p><i>9 - Financial contributions <u>and environmental compensation.</u></i></p>	<p>Accept</p> <p>Officers agree to the requested amendment as it more accurately describes the content of this section which is not limited to financial contributions but also includes environmental compensation.</p>
43 – Royal Forest and Bird Protection Society	1163	<p>Support</p> <p>Submitter supports retaining the note in Section 9.1.1 of the Plan, which recognises that changes to the RMA mean that councils will no longer be able to require financial contributions under the Act from 2022.</p>	<p>Accept</p> <p>Support noted. The note is retained as notified.</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Further submissions – Fonterra (47)		Support in part	
Section 9.1 – Purpose			
2 – Federated Farmers	1164	Support	Accept
		Submitter supports the note in Section 9.1.1 of the Plan. Retain as notified.	Support noted. The note is retained as notified.
32 – Port Taranaki	1165	Amend	No relief necessary
		Submitter seeks amendment to Section 9.1 of the Plan to include wording that provides for environmental compensation to be applied wider afield than the immediate/adjacent site or surrounding area.	Officers note that Section 9 does not generally require environmental compensation to be applied in the immediate/adjacent site or surrounding area. The majority of situations described in Section 9.1 refer to “ <i>the general area</i> ” or “ <i>locality</i> ” and is not confined to “ <i>immediate or adjacent sites</i> ”. The only exception is Section 9.1.4 [Protection, maintenance or enhancement of visual amenity and landscape] which requires compensation to occur adjacent to the site to address visual amenity impacts. Officers consider these conditions to be appropriate and provides the necessary flexibility for Council to consider the effects of consenting a particular activity and the appropriateness of avoidance, mitigation and remediation measures to address adverse environmental effects. On occasion there may be a requirement to offset or mitigate any residual effects. Such matters necessarily need to be considered on a case-by-case basis having regard for the scale of the activity and the nature of the receiving location, including the surrounding landscape.
Sections 9.1.3 – Protection, maintenance or enhancement of biodiversity			
60 – Te Kaahui o Rauru	1166	Amend	Decline
		Submitter seeks amendment to Sections 9.1.3 [Protection, maintenance or enhancement of biodiversity] of the Plan to include the option of financial contributions to improve kaitiakitanga.	The purpose of this section is to set out the criteria by which Council may require financial contributions from consent applicants. The purpose of the financial contributions are confined to giving effect to the objectives and policies of the Plan and, in particular, those values and uses identified in General Policies 1 to 21.
Further submissions – Te Rūnanga o Ngāti Mutunga (40), Te Korowai o Ngāruahine Trust (41), Te Atiawa (58)		Support	There will be occasion when financial contributions addressing those matters set out in Section 9 will also contribute to improving kaitiakitanga. However, officers do not believe it appropriate for the Plan to specify that the purpose of financial contributions to address resource management effects in the coastal marine area should be <u>specifically</u> to enhance kaitiakitanga.
Section 9.1.5 – Protection, maintenance or restoration of sites of historic importance			

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
60 – Te Kaahui o Rauru	1167	Amend Submitter seeks further engagement and discussion regarding Section 9.1.5 [Protection, maintenance or restoration of sites of historic importance]. Specifically to widen offset options.	No relief necessary Comments noted. As part of pre-hearing engagement, officers will discuss with the submitter options for widening offsets within the confines of the RMA and what particular activities may be included. Officers consider the current offset options to be reasonable and note that the options should already provide for the appropriate protection of historic heritage, including sites of significance to Māori.
Further submissions – Te Rūnanga o Ngāti Mutunga (40), Te Korowai o Ngāruahine Trust (41), Te Atiawa (58)	Support		
Section 9.1.6 – Protection, restoration or enhancement of seabed and foreshore			
60 – Te Kaahui o Rauru	1168	Amend Submitter seeks amendment to Section 9.1.6 [Protection, restoration or enhancement of seabed and foreshore] of the Plan to include the option of improving kaitiakitanga.	Decline The purpose of this section is to set out the criteria by which consents officers may require financial contributions from consent applicants. The purpose of the financial contributions are confined to giving effect to the objectives and policies of the Plan and, in particular, those values and uses identified in General Policies 1 to 21. There will be occasion when financial contributions addressing those matters set out in Section 9 will also contribute to improving kaitiakitanga. However, officers do not believe it appropriate for the Plan to specify that the purpose of financial contributions to address resource management effects in the coastal marine area should be <u>specifically</u> to enhance kaitiakitanga.
Further submissions – Te Rūnanga o Ngāti Mutunga (40), Te Korowai o Ngāruahine Trust (41), Te Atiawa (58)	Support		
Section 9.1.8 – General – environmental compensation			
43 – Royal Forest and Bird Protection Society	1169	Amend The submitter is uncertain as to how these provisions are to be applied and states that it is not appropriate to consider compensation for adverse effects which are to be avoided under the <i>New Zealand Coastal Policy Statement</i> . The submitter suggests compensation does not achieve protection of the values and characteristics to be protected. There must be limits to compensation to give effect to the <i>New Zealand Coastal Policy Statement</i> . Submitter seeks amendment to the Plan by deleting Section 9.1.8 [General environmental compensation]: 9.1.8 General – environmental compensation	Decline The submitter's comments are noted. However, officers note that environmental compensation is still subject to the objectives and policies of the Plan, which provide varying levels of protection including avoidance type policies. Environmental compensation cannot be considered in lieu of compliance with those policies. Officers recommend declining the relief sought. Environmental compensation may be a useful tool for activities unable to avoid adverse effects. This may be the case for necessary developments, upgrade or the placement of regionally important infrastructure which is provided for under the <i>Regional Policy Statement</i> (Section

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		<i>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.</i>	15.2 [Providing for regionally significant infrastructure]). Further, the <i>New Zealand Coastal Policy Statement</i> does not require avoidance of <u>all</u> adverse effects. In such instances the Council may be required to “avoid significant adverse effects” or to “have regard to”. This language may introduce instances where financial contributions are acceptable, reasonable and recommended.
Further submissions – Trans-Tasman Resources Ltd (6), Port Taranaki Ltd (32)		Oppose	It is important to recognise that these compensations can only be implemented when the policies within the Plan permit. Officers consider the policies within the Plan to be strong and to uphold the requirements of the <i>New Zealand Coastal Policy Statement</i> and therefore the compensations provided for here will be in alignment with requirements of the <i>New Zealand Coastal Policy Statement</i> .
Section 9.2 and 9.2.6 – Determining a financial contribution			
60 – Te Kaahui o Rauru	1170	Other Submitter seeks further clarification on Section 9.2 of the Plan on the use of financial contributions and their application AND Seek further engagement and discussion regarding Section 9.2.6 specifically to clarify whether it is the intention to aim for full mitigation or compensation in general, although that may not always be achieved.	No relief necessary The use of financial contributions will be tailored to the consent activity on a case-by-case basis having regard for the likely effects and in accordance with Plan policies. Full mitigation is a desirable outcome, however, officers recognise that this may not be achievable in all circumstances. Compensation is a way of recognising and providing for instances where full mitigation is not possible or is only partially possible. Section 9.2.6 provides for these instances so is a provision for compensation in general, however, it is preferable to mitigate in full if/where possible.
Section 9.2.1 –Matters to be considered			
60 – Te Kaahui o Rauru	1171	Other Submitter seeks clarification within Section 9.2.1 of the Plan to specify whether “community effects” is considered under cultural effects.	No relief necessary Consideration of community effects will recognise and take into consideration any possible cultural effects.
Further submissions – Te Rūnanga o Ngāti Mutunga (40), Te Korowai o Ngāruahine Trust (41), Te Atiawa (58)		Support	
Section 10.1 – Monitoring			
	1172	Amend	Accept

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
41 – Te Korowai o Ngāruahine Trust		Submitter seeks amendment to Section 10.1 of the Plan to include a specific method about engaging in dialogue with iwi in order to understand perceptions and values, and the application of mātauranga Māori.	This section specifically describes how the Council will determine the effectiveness of the Plan through ongoing monitoring and evaluation processes. The Council is not currently in a position to implement any monitoring programmes that include elements of mauri values or the application of mātauranga Māori but will be seeking to engage with local iwi and hapū to investigate the development of such a systems. Officers recommend granting the relief sought by the submitter by including a new Clause (3A) in Section 10.1 of the Plan that reads as follows: <i>3A. Investigate monitoring methods for the incorporation of mātauranga Māori into state of the environment monitoring for the coastal environment.</i>
Further submissions – Te Rūnanga o Ngāti Mutunga (40), Te Atiawa (58)		Support	
50 – Te Kāhui o Taranaki Trust	1173	Amend Submitter seeks amendment to Section 10.1 of the Plan to include the following new monitoring methods: <ul style="list-style-type: none"> development of a mātauranga Te Ao Māori monitoring system in partnership with iwi annual review in partnership with Iwi of the effectiveness of a co-designed and resourced Memorandum of Understanding, Mana Whakahono a Rohe Agreement and policy and consent processes. 	Accept in part There are two elements in relation to the relief sought by the submitter. In relation to the development of a mātauranga Te Ao Māori monitoring system in partnership with Iwi, Officers agree to the relief sought by including a new Clause (3A) in Section 10.1 of the Plan that reads as follows: <i>3A. Investigate monitoring methods for the incorporation of mātauranga Māori into state of the environment monitoring for the coastal environment.</i> In relation to a new method to undertake an annual review of the effectiveness of a co-designed and resourced Memorandum of Understanding and Mana Whakahono a Rohe Agreement, officers do not recommend granting the relief sought. Officers are hopeful that Memorandum of Understanding or Mana Whakahono a Rohe agreements will be implemented in the future. However, at this point in time, there are no such agreements and it is not considered appropriate to pre-empt the outcomes of those agreements, including operational details around the scope and timeframes for implementing particular aspects of those agreements, by including such detail in the Plan.
Further submissions – Te Rūnanga o Ngāti Mutunga (40), Te Korowai o Ngāruahine Trust (41), Te Atiawa (58)		Support	
60 – Te Kaahui o Rauru	1174	Amend The procedures for a review programme should include specific mention of reviewing achievement of conditions to iwi and Māori values. Submitter seeks amendment to Section 10.1 of the Plan to include Māori values as a focus point in monitoring.	Accept Officers note Implementation Method 30 of the Plan, which states that the Council will work with iwi authorities to develop memoranda of understanding that establish and maintain an effective working relationship. In particular, mana whakahono a rohe agreements between the Council and iwi represent an opportunity to set out agreements on Council – iwi relationship, including any requirements to review and report on the achievement of consent conditions relating to tangata whenua values. Section 10.1 of the Plan specifically describes how the Council will determine the effectiveness of the Plan through ongoing monitoring and evaluation processes.
Further submissions – Te Rūnanga o Ngāti Mutunga (40), Te Atiawa (58)		Support	

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
			<p>The Council is not currently in a position to implement any monitoring programmes that include elements of mauri values or the application of mātauranga Māori but will be seeking to engage with local iwi and hapū to investigate the development of such a systems. Officers recommend granting the relief sought by the submitter by including a new Clause (3A) in Section 10.1 of the Plan that reads as follows</p> <p><u><i>3A. Investigate monitoring methods for the incorporation of mātauranga Māori into state of the environment monitoring for the coastal environment.</i></u></p>

3.7 Definitions

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Definitions – General			
46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	1175	Support	Accept Definitions for “best practicable option”, “coastal marine area”, “common marine and coastal areas”, “discharge”, “environment”, “structure”, and “industrial or trade premises” are retained as notified.
		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”.	
Further submissions – Port Taranaki Ltd (32)		Support	
Definition – Accretion			
43 – Royal Forest and Bird Protection Society	1176	Amend	Accept Within the Plan, accretion is mentioned once in Policy 32 [Placement of structures] and therefore has been defined to assist in the interpretation and application of that Policy. Officers agree with the submitter that accretion is related to natural processes and recommend amending the definition of “accretion” to read: Accretion means the seaward extension of land as a result <u>of the natural process</u> of deposition of sediments.
		Submitter notes that “accretion” is not provided for in the rules and that the definition should be amended to clarify that the term relates to the natural processes. It is suggested that, as worded, the definition could include deposition resulting from reclamation. Submitter seeks amendment to the definition of “accretion” to clarify that accretion is a result of natural processes.	
Definition – Adaptive management			
6 – Trans-Tasman Resources Ltd	1177	Amend	Decline Recent case law has highlighted adaptive management as an inappropriate method of managing activities that may produce impacts that are uncertain, little understood or potentially significantly adverse. As a result, officers recommend removing reference to adaptive management from the Plan entirely, including the definition of adaptive management.
		Submitter seeks amendment to the term “adaptive management” to read: <i>Adaptive management 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 with an aim to reducing uncertainty over time via system monitoring.</u> For the purposes of this Plan, the principles underpinning adaptive management include:</i> (a) <u>robust baseline monitoring to good baseline information to</u> establish the existing receiving environment;	

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		(b) resource consent conditions that <i>require provide for</i> effective monitoring of adverse effects using appropriate indicators; [...]	
Further submissions – Royal Forest and Bird Protection Society (43), Rūnanga o Ngāti Ruanui Trust (61)		Oppose	
Further submissions – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd (46)		Support in part	
29 – Department of Conservation	1178	Support Retain the definition “adaptive management” as notified.	Decline Recent case law has highlighted adaptive management as an inappropriate method of managing activities that may produce impacts that are uncertain, little understood or potentially significantly adverse. As a result, officers recommend removing reference to adaptive management from the Plan entirely, including the definition of adaptive management.
Further submissions – Meridian Energy Ltd (20), Port Taranaki Ltd (32)		Support	
43 – Royal Forest and Bird Protection Society	1179	Amend The submitter requests reference to “adaptive management” be deleted from Policy 3 and also seeks the deletion of the definition of adaptive management from the Plan.	Accept Recent case law has highlighted adaptive management as an inappropriate method of managing activities that may produce impacts that are uncertain, little understood or potentially significantly adverse. As a result, officers recommend removing reference to adaptive management from the Plan entirely, including the definition of adaptive management as requested by the submitter.
NEW Definition – Alteration			
57 – Heritage New Zealand	1180	Amend Alteration is referred to in a number of rules relating to structures in the coastal environment. This term can be interpreted in a variety of ways, so a specific definition would aid in Plan interpretation. Submitter seeks amendment to the 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,</i>	Accept in part Officers agree that the interpretation and application of the Plan, particularly in relation to rules addressing structures in the coastal marine area, would be improved by defining the term “alteration”. Officers note that alteration may apply to many types of structures and is not restricted to buildings therefore, for the purpose of the Plan, reads as follows: <i>Alteration includes the modification of a structure in order to bring the structure up to a new standard or condition or to provide for new operational requirements. It excludes the extension of a structure.</i>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		<u>means any changes to function, layout, or appearance of a structure without changing its physical dimensions.</u>	Officers note that change to the external dimensions of a structure is defined through the term "extension" which officers suggest should also be included within the definitions section for consistency. The definition of "extension" reads: <u>Extension includes any enlargement to the external dimensions of a structure or site beyond its original size.</u>
Further submissions – Port Taranaki Ltd (32), Powerco (45), Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd (46)		Oppose	
Definition – Amenity values			
43 – Royal Forest and Bird Protection Society	1181	Amend The submitter seeks clarity on whether "amenity values" includes visual amenity so that the areas identified in Policy 18 are recognised under the <i>National Environmental Standard for Plantation Forestry</i> and seeks that, if it does not include visual amenity, that the definition be amended to include visual amenity as part of amenity values.	Decline Under the <i>National Environmental Standard for Plantation Forestry</i> , visual amenity landscape means: "a landscape or landscape feature that – (a) is identified in a district plan as having visual amenity values, however described; and (b) is identified in the policy statement or plan by its location, including by a map, a schedule, or a description of the area." Officers recommend declining the request to amend the definition of "amenity values". Amenity values is defined by the RMA and officers do not consider it appropriate to amend the statutory definition. In addition, officers note that the use of "landscapes" in the suggested amendment provides a different meaning and application of the term "amenity values" meaning that only landscapes identified in plans or policy statements can be considered to have any amenity values, significantly reducing the locations where Policy 18 can be applied within the Plan. Notwithstanding the above, visual amenity is already implied within the current definition being a quality that contributes to "people's appreciation of its pleasantness and aesthetic coherence".
Further submissions – Meridian Energy Ltd (20), Port Taranaki Ltd (32)		Oppose	
Definition – Biofouling			
16 – Ministry for Primary Industries	1182	Amend Submitter seeks amendment to the definition of "biofouling" to include the following words after aquatic environment: <ul style="list-style-type: none"> "microfouling" – a layer of microscopic organisms including bacteria and diatoms and the slimy substances they produce, Often referred to 	Accept in kind Officers recommend accepting the inclusion of definitions for macrofouling and microfouling but propose an alternative relief to that sought by the submitter. Officers suggest that the appropriate location of these definitions is not within the definition of biofouling and that each term should have its own, standalone

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		<p>as a 'slime layer', microfouling can usually be removed by gently passing a finger over the surface.</p> <ul style="list-style-type: none"> • "macrofouling" – any organism not included in the definition of "microfouling". 	<p>definition following the alphabetical listing order that is within this section of the Plan and that the definition for "biofouling" should remain as notified.</p> <p>Refer to new definitions for macrofouling and microfouling within this section.</p>
Further submissions – Trans-Tasman Resources Ltd (6)	Neutral		
Further submissions – Port Taranaki Ltd (32)	Oppose		
33 – New Zealand Defence Force	1183	<p>Support</p> <p>Retain the definition of "biofouling" as notified.</p>	<p>Accept</p> <p>Definition of biofouling is retained as notified.</p>
Further submissions – Port Taranaki Ltd (32)		Support	
Definition – Coastal environment			
43 – Royal Forest and Bird Protection Society	1184	<p>Amend</p> <p>Submitter seeks amendment to the Plan by mapping the coastal environment for Taranaki and referencing this in an amended definition of "coastal environment"</p> <p>OR</p> <p>Alternatively delete the definition:</p> <p><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 those and includes the coastal marine area</i></p>	<p>Accept</p> <p>Officers agree to include an indicative line incorporated within the coastal mapping layers to help establish the extent of the coastal environment. Consequential amendments to the Plan include an amended definition of coastal environment to read:</p> <p>Coastal environment means <u>the areas where coastal processes, influences or qualities are significant, including lakes, lagoons, tidal estuaries, saltmarshes, coastal wetlands, and the margins of those and includes all of the coastal marine areas, land inland to the point defined on Map Link, the natural and physical resources within it, and the atmosphere above it.</u></p>
Further submissions – Meridian Energy Ltd (20)	Oppose		
Further submissions – Port Taranaki Ltd (32)	Oppose in part		
45 – Powerco	1185	<p>Amend</p>	<p>Accept</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		<p>Submitter seeks amendment to the Plan by mapping the coastal environment line for Taranaki and referencing this in an amended definition of "coastal environment" to read:</p> <p><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, <u>land inland to the point defined on the maps at Schedule X, the natural and physical resources within it, and the atmosphere above it.</u></i></p>	<p>Officers agree to include an indicative coastal environment line incorporated within the coastal mapping layers to help establish the extent of the coastal environment and to amend the definition of "coastal environment". However, officers emphasize that this line is only the indicative line and the range of coastal processes captured in the original definition still apply and will be relevant for determining, case-by-case, whether or not an activity affects the coastal environment. The amended definition reads:</p> <p>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, <u>land inland to the point defined on Map Link, the natural and physical resources within it, and the atmosphere above it.</u></p> <p>Officers also recommend additional consequential amendments to the Plan, including amendments to associated planning maps to identify the indicative coastal environment line.</p>
Further submissions – Meridian Energy Ltd (20)		Oppose	
Further submissions – Transpower NZ Ltd (26)		Support in part	
Further submissions – Fonterra (47)		Support	
46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	1186	<p>Amend</p> <p>Submitter seeks amendment to the Plan by mapping the coastal environment line for Taranaki and referencing this in an amended definition of "coastal environment" to read:</p> <p><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, <u>land inland to the point defined on the maps at Schedule X, the natural and physical resources within it, and the atmosphere above it.</u></i></p>	<p>Accept</p> <p>Officers recommend granting the relief sought by the submitter. Refer to submission point 1185 above.</p>
Further submissions		20 – Meridian Energy Ltd - Oppose	
NEW Definition – Data deficient			
43 – Royal Forest and Bird Protection Society	1187	<p>Amend</p> <p>Submitter seeks amendment to the Plan to include a new 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.</p>	<p>Accept</p> <p>Officers agree to include a new definition for "data deficient species" to read:</p> <p>Data deficient species means <u>those species that are likely to be at risk or threatened, however, populations are so low that information is not available to</u></p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Further submissions – Trans-Tasman Resources Ltd (6)		Oppose	<i>determine their status under the New Zealand Threat Classification. This includes, but is not limited to, species identified as such in Schedule 4A.</i>
Definition – Disturbance			
43 – Royal Forest and Bird Protection Society	1188	Support Retain definition of “ <i>disturbance</i> ” as notified.	Accept Support noted. Definition of “ <i>disturbance</i> ” is retained as currently notified.
Definition – Ecosystem			
43 – Royal Forest and Bird Protection Society	1189	Support Retain definition of “ <i>ecosystem</i> ” as notified.	Accept Support noted. Definition of “ <i>ecosystem</i> ” is retained as currently notified.
Definition – Erosion			
43 – Royal Forest and Bird Protection Society	1190	Support Retain definition of “ <i>erosion</i> ” as notified.	Accept Support noted. Definition of “ <i>erosion</i> ” is retained as currently notified.
Definition – Estuary Modified			
29 – Department of Conservation	1191	Amend Submitter seeks amendment to the definition of “ <i>Estuary Modified</i> ” to read: [...] means the coastal management area identified in Schedule 1 of the Plan, as the Pātea, Waiwhakaiho or Waitara Estuaries <i>and their outlets</i> , and which are surrounded by urban, extensively modified environments.	Accept Officers agree to amend the definition of Estuaries Unmodified, however, recommend alternative wording to maintain consistency with the RMA and the Regional Policy Statement for Taranaki. The amended definition reads as follows: Estuaries Modified refers to the coastal management area identified in Schedule 1 of the Plan, as the Pātea, Waiwhakaiho or Waitara Estuaries <i>and river mouths</i> , and which are surrounded by extensively modified environments.
43 – Royal Forest and Bird Protection Society	1192	Amend Submitter seeks amendment to the definition of “ <i>Estuary Modified</i> ” to reflect other reliefs sought by the submitter in relation to Policy 1.	Accept in part Officers agree to amend the definition of Estuaries Unmodified, however, recommend alternative wording to maintain consistency with the RMA and the Regional Policy Statement for Taranaki. The amended definition reads as follows: Estuaries Modified refers to the coastal management area identified in Schedule 1 of the Plan, as the Pātea, Waiwhakaiho or Waitara Estuaries <i>and river mouths</i> , and which are surrounded by extensively modified environments.

Submitter	Submission point	Submitter's requests	Officers' recommendation and response	
Definition – Estuary Unmodified				
29 – Department of Conservation	1193	Amend	Accept in part	
		The submitter seeks amendment to the definition of “ <i>Estuary Unmodified</i> ” to read: <i>[...] refers to estuaries identified in Schedule 1 of the Plan, <u>and their outlets</u> that are permanently open to tidal movements and are characteristically largely unmodified.</i>	Officers agree to amend the definition of “ <i>Estuary Unmodified</i> ”, however, recommend alternative wording to maintain consistency with the RMA and the <i>Regional Policy Statement for Taranaki</i> . The amended definition reads as follows: <i>Estuaries unmodified</i> refers to estuaries <u>and river mouths</u> identified in Schedule 1 of the Plan, that are permanently open to tidal movements and are characteristically largely unmodified.	
43 – Royal Forest and Bird Protection Society	1194	Amend	Decline	
		Submitter seeks amendment to the definition of “ <i>Estuary Unmodified</i> ” to reflect other reliefs sought by submitter in relation to Policy 1.	Officers recommend to retain the definition of “ <i>Estuaries Unmodified</i> ” subject to minor amendments sought by other submitters. Refer to recommendations on Policy 1.	
NEW definition – Functional need				
26 – Transpower NZ Ltd	1195	Amend	Accept in part	
		Amend Plan to include a new definition for “ <i>functional need</i> ” to read: <u><i>The locational, operational, practical or technical needs of an activity, including development and upgrades.</i></u>	Officers agree to include a definition for “ <i>functional need</i> ” as amendments to the Plan include reference to functional need within the Policies and Rules. Officers recommend alignment with the current <i>Draft National Planning Standards</i> provided by the Ministry for the Environment as this sets and aims to standardise the definitions of district and regional plans going forward. The definition reads: <u><i>Functional need means the need for a proposal of activity to traverse, locate or operate in a particular environment because the activity can only occur in that environment.</i></u>	
		Further submissions – Meridian Energy Ltd (20)		Support
		Further submissions – Port Taranaki Ltd (32), Royal Forest and Bird Protection Society – (43)		Oppose
Further submissions - Powerco (45), Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd (46)	Support in part			
45 – Powerco	1196	Amend	Accept in part	
		Amend Plan to include a new definition for “ <i>functional need</i> ” to read:		

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		<u><i>Functional need means a requirement for a proposal or activity to traverse, locate or operate in the coastal environment.</i></u>	Officers agree to include a definition for “ <i>functional need</i> ” as amendments to the Plan include reference to functional need within the Policies and Rules. Officers recommend alignment with the current <i>Draft National Planning Standards</i> provided by the Ministry for the Environment as this sets and aims to standardise the definitions of district and regional plans going forward. The definition reads: <u><i>Functional need means the need for a proposal of activity to traverse, locate or operate in a particular environment because the activity can only occur in that environment.</i></u>
Further submissions – Royal Forest and Bird Protection Society (43)		Oppose	
46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	1197	Amend Amend Plan to include a new definition for “ <i>functional need</i> ” to read: <u><i>Functional need means a requirement for a proposal or activity to traverse, locate or operate in the coastal environment.</i></u>	Accept in part Officers agree to include a definition for “ <i>functional need</i> ” as amendments to the Plan include reference to functional need within the Policies and Rules. Officers recommend alignment with the current <i>Draft National Planning Standards</i> provided by the Ministry for the Environment as this sets and aims to standardise the definitions of district and regional plans going forward. The definition reads: <u><i>Functional need means the need for a proposal of activity to traverse, locate or operate in a particular environment because the activity can only occur in that environment.</i></u>
47 – Fonterra	1198	Amend Amend Plan to include a new definition for “ <i>functional need</i> ” to read: <u><i>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.</i></u>	Accept Officers agree to include a definition for “ <i>functional need</i> ” as requested by the submitter.
Further submissions – Trans-Tasman Resources Ltd (6)		Support	
Further submissions – Royal Forest and Bird Protection Society (43)		Oppose	
Further submissions – Powerco (45), Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd (46)		Oppose in part	
Definition – Habitat			
	1199	Support	Accept

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
43 – Royal Forest and Bird Protection Society		Retain definition of “ <i>habitat</i> ” as notified.	Support noted. Definition of “ <i>habitat</i> ” is retained as currently notified.
Definition – Hapū			
42 – Ngati Hine Hapu of Te Atiawa	1200	<p>Amend</p> <p>Submitter seek amendment to the definition of “<i>hapū</i>” to specify: <i>[...] families of people of Māori descent.</i></p>	<p>Accept</p> <p>The definition of hapū was originally taken from the <i>Regional Policy Statement</i> and was adopted in this instance to maintain consistency with this and other regional plans. However, officers agree that the relief sought provides important detail that aids in the understanding of the definition. Over time the Council will update and align the definitions that have changed across different planning documents. Officers recommend amending the definition to read:</p> <p>Hapū means sub-tribe, usually a number of whanau (families) <i>of people of Māori descent</i> with a common ancestor.</p>
Definition – Hard protection structure			
43 – Royal Forest and Bird Protection Society	1201	<p>Support</p> <p>Retain definition of “<i>hard protection structure</i>” as notified.</p>	<p>Accept</p> <p>Support noted. Definition of “<i>hard protection structure</i>” is retained as currently notified.</p>
Definition – Hazardous substance			
43 – Royal Forest and Bird Protection Society	1202	<p>Support</p> <p>Retain definition of “<i>hazardous substance</i>” as notified.</p>	<p>Accept</p> <p>Support noted. Definition of “<i>hazardous substance</i>” is retained as currently notified.</p>
46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	1203	<p>Support</p> <p>Retain definition of “<i>hazardous substances</i>” as notified.</p>	<p>Accept</p> <p>Support noted. Definition of “<i>hazardous substance</i>” is retained as currently notified.</p>
Definition – Heritage values			
43 – Royal Forest and Bird Protection Society	1204	<p>Other</p> <p>Submitter seeks clarification on whether definition of “<i>heritage values</i>” includes natural heritage values.</p>	<p>No relief necessary</p> <p>Officers note that, depending upon context, “<i>heritage values</i>” does include natural heritage values.</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Definition – Historic heritage			
42 – Ngati Hine Hapu of Te Atiawa	1205	Amend	Decline
		<p>Submitter seeks amendment of the Plan to include the currently accepted definition of waahi taonga (Treasured Place) and requests amendment to (b)(iii) of the definition for “historic heritage” to read :</p> <p>[...]</p> <p>(b)(iii) sites of significance to Māori, including waahi tapu, <u>and waahi taonga</u>; and [...]</p>	<p>The submitter comments that while the RMA generally includes sites of significance under the definition of Historic Heritage, the submitter believes this to be a too broad approach to their sites. Environment Court case law has eroded the definition of traditional waahi tapu sites, to such an extent that waahi tapu are now no more than isolated and very small areas of land. The submitter further points out, the current definition for historic heritage is given by the RMA and dictates the current definition of historic heritage.</p> <p>Officers note the submitter's comments but do not believe it appropriate to deviate from the legislative definition. However, officers note that, in an effort to recognise wider cultural values associated with sites of significance to Māori, both wāhi tapu and wāhi taonga sites have been identified within the Plan and both of these terms have received their own definitions.</p>
Definition – Incidental water			
43 – Royal Forest and Bird Protection Society	1206	Support	Accept
		Retain definition of “ <i>incidental water</i> ” as notified.	Support noted. Definition of “ <i>incidental water</i> ” is retained as currently notified.
NEW Definition – Industrial or trade site			
42 – Ngati Hine Hapu of Te Atiawa	1207	Amend	Decline
		<p>This definition is not included in the Plan, however, “<i>industrial or trade premises</i>” is. The submitter believes that there is far more chance of problems happening with a “site” than with a “premises” so would like to see this definition added.</p> <p>Amend Plan to include a definition of “industrial or trade site”.</p>	<p>The definition of “<i>industrial or trade premises</i>” is taken from the RMA. The definition has a wide application that also covers industrial or trade “sites” although this is not explicitly recognised. Officers do not consider it necessary to include a new definition when the location in question has already been provided for under the original definition.</p>
Definition – Integrated management			
43 – Royal Forest and Bird Protection Society	1208	Amend	Decline
		<p>Submitter seeks amendment to the Plan by deleting definition of “<i>integrated management</i>”.</p>	<p>The submitter comments that it is not clear whether the Plan definition of “<i>integrated management</i>” is consistent with Policy 2. The submitter suggests that it</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
			<p>is not necessary to have a definition as this is more appropriately set out in Policy 2 of the Plan to give effect to the <i>New Zealand Coastal Policy Statement</i>.</p> <p>Officers note that the submitter has not provided further explanation for where the submitter believes inconsistencies between Policy 2 and the definition of "integrated management" exist. Officers note that Policy 2 [Integrated management] explains how integrated management is to be achieved under the Plan and the specific way to manage activities that require integrated management. The definition of integrated management, however, explains what integrated management is in a general sense without directing how it is to be achieved. The definition explains what factors constitute integrated management without explaining how to achieve them. This level of detail is instead provided in Policy 2 as the submitter has alluded to. No amendments are recommended.</p>
Definition – Land			
42 – Ngati Hine Hapu of Te Atiawa	1209	<p>Amend</p> <p>Submitter seeks amendment to the definition of "land" to include everything below the surface as well as above the surface.</p>	<p>Accept in part</p> <p>Officers recommend amending the definition of "land" to reflect previous amendments to that definition in the RMA. However, officers note that the statutory definition must prevail. Within this definition it refers to land covered by water and it is implicit that this covers all area above and below the surface. The amended definition reads:</p> <p>Land –</p> <p><u>(a) includes land covered by water and the airspace above the land; and</u></p> <p><u>(b) in a national environmental standard dealing with a regional council function under section 30 or a regional rule, does not include the bed of a lake or river; and</u></p> <p><u>(c) in a national environmental standard dealing with a territorial authority function under section 31 or a district rule, includes the surface of water in a lake or river.</u></p>
NEW Definition – Macrofouling			
29 – Department of Conservation	1210	<p>Amend</p> <p>Submitter seeks amendment to the Plan by including a new definition of "macrofouling" that reads:</p> <p><u>Macrofouling - is any organism not included in the definition of microfouling.</u></p>	<p>Accept</p> <p>Officers recommend to accept the requested relief as it provides further clarity for Plan users and is consistent with additional relief requested by other submitters. New definition of "macrofouling" reads as follows:</p> <p><u>Macrofouling is any biofouling organism not included in the definition of microfouling.</u></p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Definition – Maintenance			
43 – Royal Forest and Bird Protection Society	1211	<p>Amend</p> <p>Submitter seeks amendment to the definition of “<i>maintenance</i>” to read: <i>Maintenance in relation to structures, includes activities which restore a structure or asset to its original authorised standard and purpose, and where the character, intensity and scale of the structure, asset or site remains the same or similar. It excludes the extension or repair of structures or assets, or change in location.</i> AND Amend all rules which provide for “<i>maintenance and repair</i>” to only use the term “<i>maintenance</i>”.</p> <p>Amend all rules which provide for “<i>alteration or extension</i>” in the same rule as “<i>maintenance</i>” to “<i>minor alteration or extension</i>”.</p> <p>Amend all rules which provide for new structures to include “<i>major alteration or extension</i>”.</p>	<p>Accept in kind</p> <p>The submitter comments that the definition is generally helpful, however, believes that the exclusion of repair is confusing. The definition includes restore which is equivalent to repair. Also the oxford online dictionary defines “maintain” as to “keep (a building, machine, or road) in good condition by checking or repairing it regularly.”</p> <p>The submitter supports the exclusion of “<i>extension</i>”; however they are not clear how this relates to Policy 37 which provides for “<i>major alterations and extensions</i>”. The Oxford dictionary defines “<i>extension</i>” as to enlarge or prolong something. As such it would generally fit with the policy requirements for “<i>major upgrades</i>”.</p> <p>In the submitter’s view, the Plan could provide for minor alterations or extensions in the same rules for “<i>maintenance</i>”, however, major alterations or extensions must be considered under separate rules which enable adequate consideration of effects.</p> <p>Officers recommend largely giving effect to the relief sought by the submitter by an alternative relief involving reframing the maintenance, alteration, extension and removal rules (to more clearly differentiate between the respective activities based upon changes in their areal extent or ‘footprint’). Consequential changes are also proposed to the Plan definition for “<i>maintenance</i>” and with new definitions for “<i>alteration</i>” and “<i>extension</i>” also proposed.</p> <p>The definition of “<i>maintenance</i>” has been reworded to better reflect the scope of the term and reads:</p> <p><u>Maintenance includes the ongoing and regular activities that aid in the preservation of a structure for the purpose of keeping the structure in good condition and/or working efficiently and where the character, intensity and scale of the structure remains the same. It excludes the extension or alteration of the structure or change in location.</u></p>
45 – Powerco	1212	<p>Amend</p> <p>Submitter comments that much of the maintenance work taken by the submitter arises when it has to replace old equipment with the modern equivalent or to replace a piece of equipment that is no longer working or is a safety risk. In requiring maintenance activities to restore an asset to its original authorised standard, the inference is that maintenance which is required to bring a standard</p>	<p>Accept in kind</p> <p>Officers do not consider the activity of bringing a piece of equipment up to a new standard, as described by the submitter, to be an activity covered by the scope of maintenance and in order for the Council to better control these activities recommends against combining these terms. For the purpose of the Plan this</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		<p>up to a new standard is not provided for. This is opposed but could be readily addressed by amending the definition of “maintenance”.</p> <p>Submitter seeks amendment to the definition of “maintenance” to read:</p> <p><i>Maintenance in relation to structures, includes <u>replacement, repair, or renewal</u>, activities <u>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 remains the same or similar</u>. It excludes the extension. It excludes the extension <u>or repair</u> of structures or assets, or change in location.</i></p> <p><i>Maintenance in relation to structures, includes <u>replacement, repair, or renewal</u>, activities <u>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 remains the same or similar</u>. <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.</i></p>	<p>activity is more accurately described as being an alteration for which officers recommend including a definition to read as follows:</p> <p><u>Alteration includes the modification of a structure in order to bring the structure up to a new standard or condition or to provide for new operational requirements.</u></p> <p>The separation of the terms “maintenance” and “alteration” is intentional as it allows the Council a greater level of control through the Rules than if these activities were described through one term. This does not mean that the activity will be excluded from any of the Rules but allows an increased level of detail. The following amendments to the definitions of “maintenance” are recommended in order to provide a greater amount of clarity and direction to Plan users to read:</p> <p><u>Maintenance includes the ongoing and regular activities that aid in the preservation of a structure for the purpose of keeping the structure in good condition and/or working efficiently and where the character, intensity and scale of the structure remains the same. It excludes the extension or alteration of the structure or change in location.</u></p>
Further submissions – Petroleum Exploration and Production Association of New Zealand (37)		Support in part	
Further submissions – Royal Forest and Bird Protection Society (43)		Oppose	
46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	1213	<p>Amend</p> <p>In requiring maintenance activities to restore an asset to its original authorised standard, the inference is that maintenance which is required to bring a standard up to a new standard is not provided for. This is opposed but could be readily addressed by amending the definition of “maintenance”.</p> <p>Submitter seeks amendment to the definition of “maintenance” to read:</p> <p><i>Maintenance in relation to structures, includes <u>replacement, repair, or renewal</u>, activities <u>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 remains the same or similar</u>. It excludes the extension. It excludes the extension <u>or repair</u> of structures or assets, or change in location.</i></p>	<p>Accept</p> <p>Officers do not consider the activity of bringing a piece of equipment up to a new standard, as described by the submitter, to be an activity necessarily covered by the scope of maintenance. In order for the Council to better control these activities recommends against combining these terms. For the purpose of the Plan, this activity is more accurately described as being an alteration for which officers recommend including a definition to read as follows:</p> <p><u>Alteration includes the modification of a structure in order to bring the structure up to a new standard or condition or to provide for new operational requirements.</u></p> <p>The separation of the terms “maintenance” and “alteration” is intentional as it allows the Council a greater level of control through the Rules than if these activities were described through one term. This does not mean that the activity</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Further submissions – Port Taranaki Ltd (32)		Support	will be excluded from any of the Rules but allows an increased level of detail. The following amendments to the definitions of “ <i>maintenance</i> ” are recommended in order to provide a greater amount of clarity and direction to Plan users to read:
Further submissions – Petroleum Exploration and Production Association of New Zealand (37)		Support in part	<u><i>Maintenance includes the ongoing and regular activities that aid in the preservation of a structure for the purpose of keeping the structure in good condition and/or working efficiently and where the character, intensity and scale of the structure remains the same. It excludes the extension or alteration of the structure or change in location.</i></u>
57 – Heritage New Zealand	1214	Amend Submitter seeks amendment to the Plan to include definition of “ <i>maintenance</i> ” to read: <u><i>Maintenance means the ongoing protective care of a place.</i></u>	Grant in kind Officers do not consider the relief suggested by the submitter to be sufficient for the Plan as it does not provide enough direction or clarification as to what activities can be considered “ <i>maintenance</i> ” due to the use of the term “ <i>protective care</i> ”. This term is broad and has potential to be misinterpreted or distorted to fit a user’s requirements irrespective of the intent of the Plan. Officers recommend relief to accommodate this requested relief as well as other reliefs requested to read: <u><i>Maintenance includes the ongoing and regular activities that aid in the preservation of a structure for the purpose of keeping the structure in good condition and/or working efficiently and where the character, intensity and scale of the structure remains the same. It excludes the extension or alteration of the structure or change in location.</i></u>
Further submissions – Powerco (45), Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd (46)		Oppose	
Definition – Maintenance dredging			
43 – Royal Forest and Bird Protection Society	1215	Support Retain definition of “ <i>maintenance dredging</i> ” as notified.	Accept Definition of “ <i>maintenance dredging</i> ” is retained as notified.
NEW Definition – Major alteration or extension			
43 – Royal Forest and Bird Protection Society	1216	Amend Submitter seeks amendment to the Plan to include a new definition of “ <i>major alteration or extension</i> ” to mean any alteration or extension of a structure which does not meet the definition of a minor alteration or extension.	Accept in part Major alteration or extension is mentioned once within the Proposed Plan in Policy 37. As the term does not repeat throughout the Plan and as the Policies do not relate to specific activities officers do not consider it necessary to include a definition. Officers suggest that the distinction between major and minor alterations is unnecessary and determinable through the individual reading of relevant rules.
Further submissions – Port Taranaki Ltd (32), Powerco (45)		Oppose	

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
			<p>Notwithstanding that, officers recommend giving partial relief to the request sought by the submitter involving reframing the maintenance, alterations, extensions and removal rules (to more clearly differentiate between the respective activities based upon changes in their areal extent or 'footprint'). Consequential changes are also proposed to the Plan definition for "maintenance" and with new definitions for "alteration" and "extension" also proposed.</p> <p>Officers recommend that the following new definitions of "alteration" and "extension" be included in the Plan to read as follows:</p> <p><u>Extension</u> <i>includes any enlargement to the external dimensions of a structure or site beyond its original size.</i></p> <p><u>Alteration</u> <i>includes the modification of a structure in order to bring the structure up to a new standard or condition or to provide for new operational requirements.</i></p>
Definition – Marine and coastal area			
43 – Royal Forest and Bird Protection Society	1217	Support	Accept
		Retain definition of "marine and coastal area" as notified.	Definition of "marine and coastal area" is retained as notified.
Definition – Method			
43 – Royal Forest and Bird Protection Society	1218	Support	Accept
		Retain definition of "method" as notified.	Definition of "method" is retained as notified.
NEW Definition – Microfouling			
29 – Department of Conservation	1219	Amend	Accept
		<p>Submitter seeks amendment to the Plan to include a new definition of "microfouling" that reads:</p> <p><u>Microfouling</u> <i>– 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.</i></p>	<p>Officers recommend to accept the relief and to include a new definition of 'microfouling' as sought by the submitter to read:</p> <p><u>Microfoul</u> <i>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.</i></p>
Further submissions – Port Taranaki Ltd (32)		Oppose	
Definition – Military training			

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
33 – New Zealand Defence Force	1220	Support	Accept
		Retain the definition of “ <i>military training</i> ” as notified.	Definition of “ <i>military training</i> ” is retained as notified.
NEW Definition – Minor alteration or extension			
43 – Royal Forest and Bird Protection Society	1221	Amend	Accept in part
		Submitter seeks amendment to the Plan to include a new definition of “ <i>minor alteration or extension</i> ” to read: <u><i>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.</i></u>	Use of the term minor alteration is only used within Rule 35 of the Plan. As this rule is permitted there are a number of standards, terms and conditions that guide the Plan user to determine the appropriate extent and scope of the activity. Officers note that activities that do not fit these standards, terms and conditions cannot be considered to be “minor” and will be considered under another Rule. As a result, it is not necessary to include a definition for this term as Plan users should be guided by the standards and not a definition. Notwithstanding that, officers recommend giving partial relief to the request sought by the submitter involving reframing the maintenance, alterations, extensions and removal rules (to more clearly differentiate between the respective activities based upon changes in their areal extent or ‘footprint’). Consequential changes are also proposed to the Plan definition for “ <i>maintenance</i> ” and with new definitions for “ <i>alteration</i> ” and “ <i>extension</i> ” also proposed. Officers recommend that the following new definitions of “ <i>alteration</i> ” and “ <i>extension</i> ” be included in the Plan to read as follows: <u><i>Extension includes any enlargement to the external dimensions of a structure or site beyond its original size.</i></u> <u><i>Alteration includes the modification of a structure in order to bring the structure up to a new standard or condition or to provide for new operational requirements.</i></u>
Further submissions – Port Taranaki Ltd (32)		Oppose	
Further submissions – Powerco (45)		Oppose in part	
Definition – Natural			
43 – Royal Forest and Bird Protection Society	1222	Support	Accept
		Retain the definition of “ <i>natural</i> ” as notified.	Definition of “ <i>natural</i> ” is retained as notified.
Definition – Natural Character			
	1223	Amend	Accept

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
29 – Department of Conservation		Submitter seeks amendment to the definition of “ <i>natural character</i> ” to better reflect Policy 13 of the <i>New Zealand Coastal Policy Statement</i> .	Officers recommend granting the relief sought by the submitter by amending the definition of “ <i>natural character</i> ” to clarify, for Plan users, what this term encompasses. The amended definition reads as follows: <u><i>Natural character means the extent to which a place, area or landscape in the coastal environment is a product of nature rather than cultural elements (resulting from human activity). An area with high natural character will have (or be perceived to have) a dominance of natural elements and an absence of cultural elements. Elements of natural character include (amongst other things) landforms ,such as hills, cliffs, rivers, streams etc; water and associated characteristics such as clarity, salinity, colour; locational processes such as drainage, uplift, erosion, deposition, ecosystem functioning and resilience; and plant and animal species.</i></u>
Further submissions – Meridian Energy Ltd (20)		Support	
Further submissions – Port Taranaki Ltd (32)		Support in part	
Further submissions – Powerco (45)		Oppose	
43 – Royal Forest and Bird Protection Society	1224	Amend Submitter seeks amendment to the definition of “ <i>natural character</i> ” to include in the definition that protection of natural character of the coastal environment is set out in Policy 13 of the <i>New Zealand Coastal Policy Statement</i> .	Accept in part Officers recommend granting the relief sought by the submitter by amending the definition of “ <i>natural character</i> ” to clarify, for Plan users, what this term encompasses. However, officers do not consider it necessary to reference the <i>New Zealand Coastal Policy Statement</i> directly and consider it is more beneficial to users to explicitly define the term, having regard for the specific matters within Policy 13 of the <i>New Zealand Coastal Policy Statement</i> . The amended definition reads as follows: <u><i>Natural character means the extent to which a place, area or landscape in the coastal environment is a product of nature rather than cultural elements (resulting from human activity). An area with high natural character will have (or be perceived to have) a dominance of natural elements and an absence of cultural elements. Elements of natural character include (amongst other things) landforms ,such as hills, cliffs, rivers, streams; water and associated characteristics such as clarity, salinity, colour; locational processes such as drainage, uplift, erosion, deposition, ecosystem functioning and resilience; and plant and animal species.</i></u>
Definition – Natural feature			
29 – Department of Conservation	1225	Amend Submitter seeks amendment to the definition of “ <i>natural feature</i> ” to better reflect Policy 15(c) of the <i>New Zealand Coastal Policy Statement</i> .	Accept in part Officers recommend granting the relief sought by the submitter by amending the definition of “ <i>natural feature</i> ” to clarify, for Plan users, what this term encompasses and as reflected in the <i>New Zealand Coastal Policy Statement</i> . The amended definition reads as follows:
Further submissions – Meridian Energy Ltd (20)		Support	

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Further submissions – Port Taranaki Ltd (32)		Support in part	<p><u>Natural features means a specific natural component within a landscape. Depending on the extent of the feature the term can sometimes overlap with natural landscapes. In general, a natural feature is just one component that helps to make up a landscape. Unlike natural character, a natural feature may exist in a location that has experienced a high level of cultural alteration (human activity) if that feature remains in a relatively unaltered state. Natural features includes the physical character of the area, the perception of that character and the associations with that area (including cultural, spiritual, historic and heritage associations).</u></p>
Further submissions – Powerco (45)		Oppose	
43 – Royal Forest and Bird Protection Society	1226	<p>Amend</p> <p>Amend definition of “<i>natural feature</i>” to include in the definition that protection of natural character of the coastal environment is set out in Policy 15 of the <i>New Zealand Coastal Policy Statement</i>.</p>	<p>Accept in part</p> <p>Officers recommend granting the relief sought by the submitter by amending the definition of “<i>natural feature</i>” to clarify, for Plan users, what this term encompasses and as reflected in the <i>New Zealand Coastal Policy Statement</i>. However, officers do not consider it necessary to reference the <i>New Zealand Coastal Policy Statement</i> directly and believes it is more beneficial to users to explicitly define the term, having regard for the specific matters within Policy 15 of the <i>New Zealand Coastal Policy Statement</i>. The amended definition reads as follows:</p> <p><u>Natural features means a specific natural component within a landscape. Depending on the extent of the feature the term can sometimes overlap with natural landscapes. In general, a natural feature is just one component that helps to make up a landscape. Unlike natural character, a natural feature may exist in a location that has experienced a high level of cultural alteration (human activity) if that feature remains in a relatively unaltered state. Natural features includes the physical character of the area, the perception of that character and the associations with that area (including cultural, spiritual, historic and heritage associations).</u></p>
Definition – Natural landscape			
43 – Royal Forest and Bird Protection Society	1227	<p>Amend</p> <p>Submitter seeks amendment to the definition of “<i>natural landscape</i>” to include in the definition that protection of natural character of the coastal environment is set out in Policy 15 of the <i>New Zealand Coastal Policy Statement</i>.</p>	<p>Decline</p> <p>Officers recommend declining the relief sought. Officers do not believe it necessary to specifically reference Policy 15 of the <i>New Zealand Coastal Policy Statement</i>.</p>
Further submissions – Port Taranaki Ltd (32)		Oppose	

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Definition – Naturally rare or originally rare			
43 – Royal Forest and Bird Protection Society	1228	Support	Accept
		Retain definition of “ <i>naturally rare or originally rare</i> ” as notified.	Definition of “ <i>naturally rare or originally rare</i> ” is retained as notified.
Definition – Network utility			
12 – Chorus New Zealand Limited	1229	Support	Accept
		Retain the definition of “ <i>network utility</i> ” as notified.	Definition of “ <i>network utility</i> ” is retained as notified.
13 – Spark New Zealand Trading Limited	1230	Support	Accept
		Retain the definition of “ <i>network utility</i> ” as notified.	Definition of “ <i>network utility</i> ” is retained as notified.
14 – Vodafone New Zealand Limited	1231	Support	Accept
		Retain the definition of “ <i>network utility</i> ” as notified.	Definition of “ <i>network utility</i> ” is retained as notified.
43 – Royal Forest and Bird Protection Society	1232	Support	Accept
		Retain the definition of “ <i>network utility</i> ” as notified.	Definition of “ <i>network utility</i> ” is retained as notified.
45 – Powerco	1233	Support	Accept
		Retain the definition of “ <i>network utility</i> ” as notified.	Definition of “ <i>network utility</i> ” is retained as notified.
Further submissions – Transpower NZ Ltd (26)		Support	
46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	1234	Support	Accept
		Retain the definition of “ <i>network utility</i> ” as notified.	Definition of “ <i>network utility</i> ” is retained as notified.
59 – KiwiRail	1235	Support	Accept
		Retain the definition of “ <i>network utility</i> ” as notified.	Definition of “ <i>network utility</i> ” is retained as notified.
Definition – Offshore installation or installation			
	1236	Support	Accept

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
43 – Royal Forest and Bird Protection Society		Retain the definition of “ <i>offshore installation or installation</i> ” as notified.	Definition of “ <i>offshore installation or installation</i> ” is retained as notified.
NEW definition – Operational requirement			
47 – Fonterra	1237	<p>Amend</p> <p>Submitter seeks amendment to the Plan to include a new definition for “operational requirement” to read:</p> <p><i>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.</i></p>	<p>Accept</p> <p>Submitter requests amendment to the Plan to include a definition for “<i>operational requirement</i>” as a consequential amendment as a result of amendments requested for Policy 5 [Appropriate use and development of the coastal environment] of the Plan.</p> <p>Officers recommend granting the relief sought by the submitter to include a definition of “<i>operational requirement</i>” to read:</p> <p><i>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.</i></p>
Further submissions – Royal Forest and Bird Protection Society (43)		Oppose	
Further submissions – Powerco (45), Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd (46)		Oppose in part	
Definition – Outstanding Value			
43 – Royal Forest and Bird Protection Society	1238	<p>Amend</p> <p>Submitter seeks amendment to the definition of “<i>Outstanding Value</i>” to refer to areas identified under Policy 8 of the Plan.</p>	<p>No relief required</p> <p>These areas are already identified within the definition of outstanding value with reference to Schedule 1 and 2 of the Plan. Schedules 1 and 2 are the main sources whereby Policy 8 also directs the reader to this location. Therefore, it is not necessary to also refer to Policy 8. Officers recommend retaining the current wording of “<i>outstanding value</i>” as notified.</p>
Definition – Petroleum			
42 – Ngati Hine Hapu of Te Atiawa	1239	<p>Amend</p> <p>Submitter considers the definition of “<i>petroleum</i>” to be rather long-winded and that (a) and (b) could be combined to simply read:</p> <p><i>[...] any naturally occurring hydrocarbon or naturally occurring mixture of hydrocarbons (other than coal) whether in a gaseous, liquid or solid state.</i></p>	<p>Accept in part</p> <p>Officers recommend granting the relief sought by the submitter by amending the definition of “<i>petroleum</i>” to read:</p> <p><i>[...] any naturally occurring hydrocarbon or naturally occurring mixture of hydrocarbons (other than coal) whether in a gaseous, liquid or solid state [...].</i></p>
	1240	Support	Accept

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
43 – Royal Forest and Bird Protection Society		Retain the definition of “ <i>petroleum</i> ” as notified.	Definition of “ <i>petroleum</i> ” is retained subject to minor amendment in response to a relief sought by another submitter (refer submission point 1239).
Definition – Pipeline			
42 – Ngati Hine Hapu of Te Atiawa	1241	Amend	Decline
		Submitter seeks amendment to definition of “pipeline” to delete reference to machinery and tanks and read: [...] a pipeline constructed or used to convey any matter or substance, and includes all machinery, tanks and fittings connected to the pipeline.	The submitter considers the definition of pipeline, as it stands, to be too broad. A pipeline does not mean all machinery, tanks and fittings connected to the pipeline. The submitter will accept that pipelines includes fittings connected to the line, however other machinery and tanks should be removed from this definition and, if required, have their own definition. Officers consider a “ <i>pipeline</i> ” to encompass any equipment that aids the pipeline in the normal transportation of materials through that pipeline. Officers note that there are no instances within the Plan where a pipeline would be considered separate from all equipment that aids in its operation and therefore consider it unnecessary, and potentially confusing for Plan users, to separate them within the definition. Further, this amendment would require additional consequential amendments throughout the Plan, to align the policies and rules to the new definitions, which officers do not believe offers additional value in either the clarity or readability of the Plan. Officers recommend to retain the definition of “ <i>pipeline</i> ” as currently notified.
43 – Royal Forest and Bird Protection Society	1242	Support	Accept
		Retain the definition of “ <i>pipeline</i> ” as notified.	Definition of “ <i>pipeline</i> ” retained as notified.
45 – Powerco	1243	Support	Accept
		Retain the definition of “ <i>pipeline</i> ” as notified.	Definition of “ <i>pipeline</i> ” retained as notified.
46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	1244	Support	Accept
		Retain the definition of “ <i>pipeline</i> ” as notified.	Definition of “ <i>pipeline</i> ” retained as notified.
Definition – Port			
	1245	Amend	Accept in part

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
43 – Royal Forest and Bird Protection Society		Submitter seeks amendment of the definition of “Port” to state that the port is Port Taranaki OR Alternatively delete the definition.	The submitter contends that the current definition does not make sense given the common meaning of port. The submitter suggests Policy 1 sets out that the “port” is Port Taranaki and states the definition would be clearer if it said it was the Port of Taranaki. Officers recommend amending the definition of “Port” to read: Port refers to the coastal management area identified in Schedule 1 of the Plan <u>as Port Taranaki</u> .
Further submissions – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd (46)		Oppose in part	
Further submissions – Port Taranaki Ltd (32)		Oppose	
Definition – Port Air Zone			
43 – Royal Forest and Bird Protection Society	1246	Amend Submitter seeks amendment to the definition of “Port Air Zone” to state that it relates to Port Taranaki.	Accept Officers agree to amend the definition of “port air zone” to read: Port air zone <u>relates to Port Taranaki and is identified in refer to</u> Schedule 8 of the Plan.
Definition – Produced water			
42 – Ngati Hine Hapu of Te Atiawa	1247	Amend Submitter seeks amendment to the definition of “produced water” to read: <i>Produced water means water with <u>or without</u> high mineral or salt content associated with the production of oil and gas from reservoirs. It may include water, water that has been injected into the reservoir, and any chemicals added during the production/treatment/enhancement process.</i>	Decline Produced water is a specific by product of the petroleum industry. The characteristics of this by product are well known and anticipated due to the operational methods and associated products used during petroleum production. Produced water is a brine liquid that, due to the operational methods, will contain high mineral and/or salt content. It is therefore not necessary to include the possibility that the water may not contain high mineral or salt content. Officers consider this addition unnecessary and broadens the scope of the definition unreasonably. Therefore, officers recommend retaining the definition of “produced water” as currently notified.
43 – Royal Forest and Bird Protection Society	1248	Support Retain the definition of “produced water” as notified.	Accept Definition of “produced water” retained as notified.
Definition – Rare and uncommon ecosystem type			
	1249	Support	Accept

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
43 – Royal Forest and Bird Protection Society		Retain the definition of “rare and uncommon ecosystem type” as notified.	Definition of “rare and uncommon ecosystems” retained as notified.
NEW Definition – Reclamation			
43 – Royal Forest and Bird Protection Society	1250	<p>Amend</p> <p>Submitter seeks amendment to the definition of “reclamation” to read (or similar):</p> <p><i>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:</i></p> <p><i>1. land that has arisen above the line of mean high-water springs as a result of natural processes, including accretion, or</i></p> <p><i>2. any infilling where the purpose is to provide beach nourishment, or</i></p> <p><i>3. structures such as breakwaters, moles, groynes or sea walls.</i></p>	<p>Accept</p> <p>Officers recommend granting the relief sought by the submitter by amending the Plan to include a definition for “reclamation” to read:</p> <p>Reclamation means the formation of permanent land located above mean high water springs that was formerly below the line of mean high water springs.</p> <p>Reclamation does not include:</p> <p><i>(a) land that has arisen above the line of mean high-water springs as a result of natural processes, including accretion;</i></p> <p><i>(b) any infilling where the purpose is to provide beach nourishment; or</i></p> <p><i>(c) structures such as breakwaters, moles, groynes or sea walls.</i></p>
Further submissions – Port Taranaki Ltd (32)		Oppose	
Definition – Regionally distinctive			
43 – Royal Forest and Bird Protection Society	1251	<p>Support</p> <p>Retain the definition of “regionally distinctive” as notified.</p>	<p>Accept</p> <p>The definition of “regionally distinctive” is retained as notified.</p>
Definition – Regionally important infrastructure			
12 – Chorus New Zealand Limited	1252	<p>Amend</p> <p>Submitter seeks amendment to the definition of “regionally important infrastructure” so that it preferably refers only to “infrastructure” and to read as follows:</p> <p>Regionally important infrastructure means infrastructure of regional and/or national importance and is includes:</p> <p><i>(a) Port Taranaki and its approaches and on-going development to meet changing operational needs;</i></p> <p><i>(b) facilities and arterial pipelines for the supply or distribution of minerals including oil and gas and their derivatives;</i></p> <p><i>(c) the national electricity grid, as defined by the Electricity Industry Act 2010;</i></p>	<p>Accept</p> <p>The intent of this definition is to specifically highlight infrastructure that the Council considers to be significant to the economic and social wellbeing of Taranaki and New Zealand. This definition has been intentionally constrained to only include specific infrastructures and exclude others. It is therefore considered inappropriate to broaden the term to encompass all “infrastructure”.</p> <p>However, officers recommend granting that part of the relief sought by the submitter to amend (h) and (i) by deleting reference to strategic facilities. Officers recommend making that part of the change to better align with terminology adopted in relevant legislation relating to those facilities.</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		<p>(d) facilities for the generation and/or transmission of electricity where it is supplied to the national electricity grid and/or the local electricity distribution network, including supply within the local electricity distribution network;</p> <p>(e) defence facilities;</p> <p>(f) flood protection works;</p> <p>(g) infrastructure associated with the safe and efficient operation of state highways and the rail network;</p> <p>(h) strategic telecommunications facilities, as defined in section 5 of the Telecommunications Act 2001;</p> <p>(i) strategic radiocommunications facilities as defined in section 2(1) of the Radio Communications Act 1989;</p> <p>(j) New Plymouth airport, including flight paths;</p> <p>(k) arterial pipelines and pumping stations for the distribution of potable water and water treatment plants; and</p> <p>(l) arterial pipelines and pumping stations for the collection of wastewater and stormwater, and wastewater treatment plants.</p> <p>OR</p> <p>amend the definition of "regionally important infrastructure" as follows: <i>Regionally important infrastructure means infrastructure of regional and/or national importance and is:</i> [...]</p> <p>(h) strategic telecommunications facilities, as defined in section 5 of the Telecommunications Act 2001;</p> <p>(i) strategic radiocommunications facilities as defined in section 2(1) of the Radio Communications Act 1989 [...]</p>	
13 – Spark New Zealand Trading Limited	1253	<p>Amend</p> <p>Submitter seeks amendment to the definition of "regionally important infrastructure" so that it preferably refers only to "infrastructure" and to read as follows: <i>Regionally important infrastructure means infrastructure of regional and/or national importance and is</i> includes:</p> <p>(a) Port Taranaki and its approaches and on-going development to meet changing operational needs;</p>	<p>Accept</p> <p>The intent of this definition is to specifically highlight infrastructure that the Council considers to be significant to the economic and social wellbeing of Taranaki and New Zealand. This definition has been intentionally constrained to only include specific infrastructures and exclude others. It is therefore considered inappropriate to broaden the term to encompass all "infrastructure".</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		<p>(b) facilities and arterial pipelines for the supply or distribution of minerals including oil and gas and their derivatives;</p> <p>(c) the national electricity grid, as defined by the Electricity Industry Act 2010;</p> <p>(d) facilities for the generation and/or transmission of electricity where it is supplied to the national electricity grid and/or the local electricity distribution network, including supply within the local electricity distribution network;</p> <p>(e) defence facilities;</p> <p>(f) flood protection works;</p> <p>(g) infrastructure associated with the safe and efficient operation of state highways and the rail network;</p> <p>(h) strategic telecommunications facilities, as defined in section 5 of the Telecommunications Act 2001;</p> <p>(i) strategic radiocommunications facilities as defined in section 2(1) of the Radio Communications Act 1989;</p> <p>(j) New Plymouth airport, including flight paths;</p> <p>(k) arterial pipelines and pumping stations for the distribution of potable water and water treatment plants; and</p> <p>(l) arterial pipelines and pumping stations for the collection of wastewater and stormwater, and wastewater treatment plants.</p> <p>OR</p> <p>amend the definition of “regionally important infrastructure” as follows: <i>Regionally important infrastructure means infrastructure of regional and/or national importance and is:</i> [...]</p> <p>(h) strategic telecommunications facilities, as defined in section 5 of the Telecommunications Act 2001;</p> <p>(i) strategic radiocommunications facilities as defined in section 2(1) of the Radio Communications Act 1989 [...]</p>	<p>However, officers recommend granting that part of the relief sought by the submitter to amend (h) and (i) by deleting reference to strategic facilities. Officers recommend making that part of the change to better align with terminology adopted in relevant legislation relating to those facilities.</p>
14 – Vodafone New Zealand Ltd	1254	<p>Amend</p> <p>Submitter seeks amendment to the definition of “regionally important infrastructure” so that it preferably refers only to “infrastructure” and to read as follows:</p>	<p>Accept</p> <p>The intent of this definition is to specifically highlight infrastructure that the Council considers to be significant to the economic and social wellbeing of Taranaki and New Zealand. This definition has been intentionally constrained to only include</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		<p>Regionally important infrastructure means infrastructure of regional and/or national importance and is includes:</p> <p>(a) Port Taranaki and its approaches and on-going development to meet changing operational needs;</p> <p>(b) facilities and arterial pipelines for the supply or distribution of minerals including oil and gas and their derivatives;</p> <p>(c) the national electricity grid, as defined by the Electricity Industry Act 2010;</p> <p>(d) facilities for the generation and/or transmission of electricity where it is supplied to the national electricity grid and/or the local electricity distribution network, including supply within the local electricity distribution network;</p> <p>(e) defence facilities;</p> <p>(f) flood protection works;</p> <p>(g) infrastructure associated with the safe and efficient operation of state highways and the rail network;</p> <p>(h) strategic telecommunications facilities, as defined in section 5 of the Telecommunications Act 2001;</p> <p>(i) strategic radiocommunications facilities as defined in section 2(1) of the Radio Communications Act 1989;</p> <p>(j) New Plymouth airport, including flight paths;</p> <p>(k) arterial pipelines and pumping stations for the distribution of potable water and water treatment plants; and</p> <p>(l) arterial pipelines and pumping stations for the collection of wastewater and stormwater, and wastewater treatment plants.</p> <p>OR</p> <p>amend the definition of "regionally important infrastructure" as follows:</p> <p>Regionally important infrastructure means infrastructure of regional and/or national importance and is:</p> <p>[...]</p> <p>(h) strategic telecommunications facilities, as defined in section 5 of the Telecommunications Act 2001;</p> <p>(i) strategic radiocommunications facilities as defined in section 2(1) of the Radio Communications Act 1989 [...]</p>	<p>specific infrastructures and exclude others. It is therefore considered inappropriate to broaden the term to encompass all "infrastructure".</p> <p>However, officers recommend granting that part of the relief sought by the submitter to amend (h) and (i) by deleting reference to strategic facilities. Officers recommend making that part of the change to better align with terminology adopted in relevant legislation relating to those facilities.</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
23 – New Plymouth District Council	1255	Support	Accept
		Retain (k) and (l) in the definition of “regionally important infrastructure”.	Clauses (k) and (l) in the definition of “regionally important infrastructure” are retained as notified.
26 – Transpower NZ Ltd	1256	Amend	Decline
		<p>Submitter seeks amendment to the definition of “regionally important infrastructure” throughout the Plan to refer to regionally significant infrastructure”</p> <p>AND</p> <p>That the reference to the National Grid be amended to read:</p> <p>(c) the National electricity Ggrid, <i>being the assets used or owned by Transpower New Zealand Limited as defined by the Electricity Industry Act 2010</i>;</p> <p>AND</p> <p>That a new definition of “National Grid” is added to the Definition Chapter as follows:</p> <p><i>National Grid means the assets used or owned by Transpower New Zealand Limited.</i></p>	<p>Officers recommend declining the relief sought to amend the Plan to refer to “regionally significant infrastructure” rather than “regionally important infrastructure” in the interests of aligning terminology with other regions (noting that similar terminology has been adopted in other recent second generation plans).</p> <p>Officers also recommend no amendments to (c) as the definition should be directly aligned to specific legislation rather than any particular company. This allows the definition to be future proofed in the event that Transpower NZ Ltd is no longer the National Grid provider or title changes are made.</p> <p>Reference to the National Grid has not been used within the Plan outside of the definition of “regionally important infrastructure” so is of no additional use to readers and should not be included within the Plan.</p>
33 – New Zealand Defence Force	1257	Support	Accept
		Retain the definition of “regionally important infrastructure” as notified, particularly (e) which refers to defence facilities.	Clause (e) of “regionally important infrastructure” is retained as notified.
35 – Radio New Zealand Ltd	1258	Amend	Decline
		<p>Submitter seeks amendment to the definition of “regionally important infrastructure” as follows:</p> <p><i>Regionally important infrastructure means infrastructure of regional and/or national importance and is:</i></p> <p>[...]</p> <p>(i) strategic radio communications <i>radiocommunications</i> facilities as defined in section 2(1) of the Radiocommunications Act 1989 [...]</p>	<p>The reason for including “strategic” radiocommunications facilities within the definition for “regionally important infrastructure” is to highlight those essential radiocommunications facilities that provide an essential national or regional service and to differentiate these from less critical facilities.</p> <p>However, officers recommend granting the relief sought by the submitter seeking amendments to (i) to delete reference to strategic facilities, officers recommend making that part of the change to better align with terminology adopted in relevant legislation relating to those facilities.</p>
	1259	Amend	Accept

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
37 – Petroleum Exploration and Production Association of NZ		Submitter seeks amendment to the definition of “regionally important infrastructure” to read: <i>Regionally important infrastructure means infrastructure of regional and/or national importance and is:</i> [...] <i>(c) facilities and arterial pipelines for the supply, <u>storage</u> or distribution of minerals including oil and gas and their derivatives; [...]</i>	Officers agree to amend clause (c) of the definition of “regionally important infrastructure” to include the storage of minerals including oil and gas and their derivatives as requested by the submitter to read: <i>Regionally important infrastructure means infrastructure of regional and/or national importance and is:</i> [...] <i>(b) facilities and arterial pipelines for the supply, <u>storage</u> or distribution of minerals including oil and gas and their derivatives; [...]</i>
Further submissions – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd (46)		Neutral	
43 – Royal Forest and Bird Protection Society	1260	Support Retain the definition of “regionally important infrastructure” as notified.	Accept The definition of “regionally important infrastructure” is retained as notified.
Further submissions – Te Atiawa (58)		Support	
45 – Powerco	1261	Support 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.	Decline Officers recommend declining the relief sought to amend the Plan to refer to “regionally significant infrastructure” rather than “regionally important infrastructure” in the interests of aligning terminology with other regions (noting that similar terminology has been adopted in other recent second generation plans).
Further submissions – Port Taranaki Ltd (32)		Support in part	
46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	1262	Support 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.	Accept Officers recommend declining the relief sought to amend the Plan to refer to “regionally significant infrastructure” rather than “regionally important infrastructure” in the interests of aligning terminology with other regions (noting that similar terminology has been adopted in other recent second generation plans).
59 – KiwiRail	1263	Support Retain the definition of “regionally important infrastructure” as notified.	Accept The definition of “regionally important infrastructure” is retained subject to minor amendments sought by other submitters
Definition – Repair			

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
43 – Royal Forest and Bird Protection Society	1264	Amend	Accept
		Submitter seeks amendment to the Plan by deleting the definition of “repair”: Repair means reconstruction.	The submitter suggests that repair is a key aspect of maintenance and must be included within that definition. Officers recommend granting the relief sought. Repairs are a type of maintenance activity and the standalone definition should be deleted. Consequential amendments are also necessary to the definition of maintenance.
45 – Powerco	1265	Amend	Accept
		Submitter seeks amendment to the Plan by deleting the definition of “repair”: Repair means reconstruction.	The submitter suggests that repair is a type of maintenance activity and that the standalone definition should be deleted. Officers recommend granting the relief sought. Consequential amendments are also necessary to the definition of maintenance.
46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	1266	Amend	Accept
		Submitter seeks amendment to the Plan by deleting the definition of “repair”: Repair means reconstruction.	The submitter suggests that repair is a type of maintenance activity and that the standalone definition should be deleted. Officers recommend granting the relief sought. Consequential amendments are also necessary to the definition of maintenance.
47 – Fonterra	1267	Support	Decline
		Retain the definition of “repair”.	Several submitters have requested deletion of the definition of “repair” to which officers agree.
Further submissions – Port Taranaki Ltd (32)		Support	
57 – Heritage New Zealand	1268	Amend	Decline
		Submitter seeks amendment to the Plan by changing the definition of “repair” to read: Repair means reconstruction. <u>Repair (of historic heritage) means the restoration to good or sound condition of any existing structure (or any part of an existing structure) for the purpose of its maintenance.</u>	Several submitters have requested deletion of the definition of “repair” to which officers agree.
Definition – Reverse sensitivity			
	1269	Support	Accept in kind

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
43 – Royal Forest and Bird Protection Society		Retain the definition of “reverse sensitivity” as notified.	Support noted. The definition of reverse sensitivity is recommended to be amended in order to provide more clear direction to Plan users. However, the intent and scope of the definition is retained.
Further submissions – Port Taranaki Ltd (32)		Support	
45 – Powerco	1270	<p>Amend</p> <p>Submitter seeks amendment to the definition of “reverse sensitivity” to read: <i>Reverse sensitivity refers to <u>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></i></p>	<p>Accept</p> <p>A range of activities may be susceptible to reverse sensitivity effects. As drafted, it could be interpreted that only sensitive activities, for instance residential activities, care facilities, and the like could be affected in this way. This does not recognise that other activities may also be affected. The submitter has suggested amendments to the definition that retain its intent but provides added clarity and minimises potential for misinterpretation.</p> <p>Officers agree that the definition for “reverse sensitivity” is ambiguous and potentially confusing. Officers recommend amending the definition to read as follows:</p> <p><i>Reverse sensitivity refers to <u>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 existing activity in their vicinity.</u></i></p>
Further submissions – Federated Farmers (2)		Support in part	
Further submissions – Transpower NZ Ltd (26)		Support	
46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	1271	<p>Amend</p> <p>Submitter seeks amendment to the definition of “reverse sensitivity” to read: <i>Reverse sensitivity refers to <u>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></i></p>	<p>Accept</p> <p>A range of activities may be susceptible to reverse sensitivity effects. As drafted, the submitter believes that the definition could be interpreted that only sensitive activities, for instance residential activities, care facilities, and the like could be affected in this way. This does not recognise that other activities may also be affected. The submitter has suggested amendments to the definition that retain its intent but provides added clarity and minimises potential for misinterpretation.</p> <p>Officers agree that the definition for “reverse sensitivity” is ambiguous and potentially confusing. Officers recommend amending the definition to read as follows:</p> <p><i>Reverse sensitivity refers to <u>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 existing activity in their vicinity.</u></i></p>
Further submissions – Te Rūnanga o Ngāti Mutunga (40), Te Atiawa (58)		Oppose	

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Definition – Seascape			
43 – Royal Forest and Bird Protection Society	1272	Support	Accept
		Retain the definition of “ <i>seascape</i> ” as notified.	Definition of “ <i>seascape</i> ” is retained as notified.
Definition – Sensitive marine benthic habitats			
43 – Royal Forest and Bird Protection Society	1273	Support	Accept
		Retain the definition of “ <i>sensitive marine benthic habitats</i> ” as notified.	Definition of “ <i>sensitive marine benthic habitats</i> ” as notified.
Definition – Sewage			
42 – Ngati Hine Hapu of Te Atiawa	1274	Amend	Accept
		Submitter seeks amendment to the definition of “ <i>sewage</i> ” to read: <i>Sewage means: drainage and other wastes from any form of toilet, urinal and WC water closet scupper [...]</i>	Officers agree that the use of the abbreviation “WC” is unclear. Officers therefore recommend amending the definition of “ <i>sewage</i> ” to read: Sewage means: <i>(a) drainage and other wastes from any form of toilet, urinal and WC water closet scupper [...]</i>
43 – Royal Forest and Bird Protection Society	1275	Support	Accept
		Retain the definition of “ <i>sewage</i> ” as notified.	Note that a minor, inconsequential amendment has been made to improve the readability and clarity of the definition.
Definition – Significant indigenous biodiversity			
43 – Royal Forest and Bird Protection Society	1276	Support	Accept
		Retain the definition of “ <i>significant indigenous biodiversity</i> ” as notified.	Definition of “ <i>significant indigenous biodiversity</i> ” is retained as notified.
Definition – Silent files			
42 – Ngati Hine Hapu of Te Atiawa	1277	Amend	Decline
		Submitter seeks amendment to the Plan to include a new definition for “ <i>silent files</i> ” added to describe those sites that iwi/hapū have identified but do not wish to disclose details or even the location of.	Silent files is mentioned within the Plan only once. Officers do not believe that the use of the term requires reference in the definitions section. The term is generally understood by the public and does not take on any additional, or contrary meaning within the Plan. The location of its use within the Plan indicates that these files

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
			relate to iwi/hapū sites. Officers consider the addition of "silent files" to the definitions section to be unnecessary.
Definition – Stormwater			
43 – Royal Forest and Bird Protection Society	1278	Support	Accept
		Retain the definition of "stormwater" as notified.	Definition of "stormwater" is retained as notified.
46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	1279	Support	Accept
		Retain the definition of "stormwater" as notified.	Definition of "stormwater" is retained as notified.
Definition – Structure			
45 – Powerco	1280	Support	Accept
		Retain the definition of "structure" as notified.	Definition of "structure" is retained as notified.
Definition – Surf break			
43 – Royal Forest and Bird Protection Society	1281	Support	Accept
		Retain the definition of "surf break" as notified.	Definition of "surf break" is retained as notified.
Definition – Surfable wave			
43 – Royal Forest and Bird Protection Society	1282	Support	Accept
		Retain the definition of "surfable wave" as notified.	Definition of "surfable wave" is retained as notified.
Definition – Synthetic based drilling muds			
43 – Royal Forest and Bird Protection Society	1283	Support	Accept
		Retain the definition of "synthetic based drilling muds" as notified.	Definition of "synthetic based drilling muds" is retained as notified.
Definition – Tangata whenua			
42 – Ngati Hine Hapu of Te Atiawa	1284	Amend	Decline
		Submitter seeks amendment to the definition of "tangata whenua" to read:	The RMA sets out the legislative definition of tangata whenua from which the Plan takes the definition from. Officers recommend retaining the current definition of

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		<i>Tangata whenua* in relation to a particular area, means the iwi, or hapū, <u>or whanau</u> that holds mana whenua over the area.</i>	"tangata whenua" as notified to maintain consistency with the RMA as well as other regional and national plans. Notwithstanding the above, officers offer reassurance to the submitter that the definition does not exclude "whanau" but is implicit within the inclusion of hapū which is defined within the Plan and includes whanau. Refer to the amended definition of hapū for more information.
Definition – Taonga			
42 – Ngati Hine Hapu of Te Atiawa	1285	Amend Submitter seeks amendment to the definition of "taonga" to include iwi, hapū and whanau, or perhaps generically, use the word Māori.	Grant in kind The submitter comments that currently the definition describes prized possessions of the tribe only. Officers have investigated the meaning of the word "taonga" and recommend simplifying the meaning to broaden it and not to refer to iwi, hapū, whanau or Māori as this is implicit. <u>Taonga means treasured and/or prized possession(s).</u>
Definition – Threatened			
43 – Royal Forest and Bird Protection Society	1286	Support Retain the definition of "threatened" as notified.	Accept The definition of "threatened" is retained as notified.
Definition – Waihi taonga			
42 – Ngati Hine Hapu of Te Atiawa	1287	Amend Submitter seeks amendment to the Plan to include a new definition for "wahi taonga".	Accept Officers recommend granting the relief sought by the submitter by including a definition of "wahi taonga" that reads as follows: <u>Wahi taonga means a treasured location or place.</u>
Definition – Wastewater			
43 – Royal Forest and Bird Protection Society	1288	Support Retain the definition of "wastewater" as notified.	Accept The definition of "wastewater" is retained as notified.
Definition – Water based drilling muds			
	1289	Support	Accept

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
43 – Royal Forest and Bird Protection Society		Retain the definition of “ <i>water based drilling muds</i> ” as notified.	The definition of “ <i>water based drilling muds</i> ” is retained as notified.
Definition – Water quality			
43 – Royal Forest and Bird Protection Society	1290	Support	Accept
		Retain the definition of “ <i>water quality</i> ” as notified.	The definition of “ <i>water quality</i> ” is retained as notified.
Definition – Well			
32 – Port Taranaki Ltd	1291	Amend	Accept in part
		<p>Submitter seeks amendment to the definition of “<i>well</i>” to include wells and bores for other purposes, including for the purposes of geotechnical investigations</p> <p>AND</p> <p>provide for such investigations through a rule that permits test bores/wells for geotechnical investigative purposes subject to permitted conditions.</p> <p>The proposed definition of “<i>well</i>” would read as follows:</p> <p>Well means a hole drilled for <i>geotechnical investigation or for</i> the purpose of exploring for, appraising or extracting hydrocarbons and includes:</p> <p>(a) any hole for injection purposes;</p> <p>(b) any down-hole pressure containing equipment; and</p> <p>(c) any pressure-containing equipment on top of the well.</p>	Officers recommend declining the relief sought in relation to “ <i>well</i> ” which is deliberately framed to capture drilling for hydrocarbon exploration only. However, officers do agree to amend the Plan to include a permitted activity rule to provide for test bores and drilling on the seafloor and seabed for geotechnical investigative purposes.
43 – Royal Forest and Bird Protection Society	1292	Support	Accept
		Retain the definition of “ <i>well</i> ” as notified.	The definition of “ <i>well</i> ” is retained as notified.
Definition – Wetland			
43 – Royal Forest and Bird Protection Society	1293	Support	Accept
		Retain the definition of “ <i>wetland</i> ” as notified.	The definition of “ <i>wetland</i> ” is retained as notified.

3.8 Schedules and appendices

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Schedule 1 – Coastal management areas			
28 – Grant Knuckey	1294	Amend Submitter seeks amendment to Schedule 1 of the Plan to identify two new marine spatial management areas – Wahi Tapu Areas and Wahi Taonga Areas.	Grant in kind Officers do not consider it appropriate to include wāhi tapu and wāhi taonga as independent coastal management areas within Schedule 1.
Further submissions – Te Korowai o Ngāruahine Trust (41)		Support	Officers have noted requests for amendments to the Plan to include reference to both wāhi tapu and wāhi taonga sites and have agreed to many of these requests provided it is within the correct context Schedule 5B identifies sites of significance to Māori (and associated values) and should include wāhi tapu and wāhi taonga areas as identified by iwi or hapū. Officers are aware that this is not explicitly stated in Schedule 5B so recommend amending the introduction of Schedule 5B to read: <i>Schedule 5B - Sites of significance to Māori and associated values</i> <i>This schedule identifies known sites with special cultural, spiritual, historical and traditional associations located within the coastal marine area. The Taranaki Regional Council is committed to working with iwi o Taranaki to identify all culturally significant sites that are located within the coastal marine area. Site locations area approximate only and are not intended to provide a definitive location or extent of a site. <u>These include those sites that are identified as wāhi tapu and wāhi taonga by the iwi and hapū.</u> [...]</i>
43 – Royal Forest and Bird Protection Society	1295	Amend Submitter seeks amendment to Schedule 1 of the Plan 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.	Grant in kind Officers note that, although the Council does contain information relating to significant indigenous biodiversity areas, there is a lack of comprehensive information relating to significant indigenous biodiversity within the coastal marine area and that any information that exists may be better suited to sit outside of the Plan. However, officers recommend including specific layers for significant indigenous biodiversity where complete, including the maui dolphin sanctuary and also the significant sea bird areas.
Further submissions – Department of Conservation (29)		Support	
	1296	Amend	Accept

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
43 – Royal Forest and Bird Protection Society		Submitter seeks amendment to Schedule 1 of the Plan by replacing the numbering (e.g. 1 to 5) so that each coastal management area is identified as (a) to (e) in a manner consistent with Policy 1(a) to (e).	Officers agree to amend the numbering system of coastal management areas in Schedule 1 to reflect the same style used in Policy 1.
47 – Fonterra	1297	Support Retain the classification of the coastal marine environment in the vicinity of Whareroa as Open Coast.	Accept The classification of the coastal marine environment in the vicinity of Whareroa is retained as an Open Coast management area as currently notified.
Schedules 1 and 2 – Coastal management areas and areas of outstanding value			
21 – Climate Justice Taranaki	1298	Amend Submitter seeks amendment to Schedules 1 and 2 of the Plan to include and identify as coastal management areas of Outstanding Value based on the recommendation of Cawthron from the report <i>Sensitive habitats and threatened species in the Taranaki Coastal Marine Area (TCMA)</i> : <ul style="list-style-type: none"> • Patea Shoals • Rolling Ground. The submitter requests that the Council investigate the value of Graham Bank as this has potential to be an outstanding area.	Decline Officers recognise the recommendation of the report to “consider” Patea Shoals and that the Council report by Cawthron (2016) described the Patea Shoals and Rolling Ground as “worth considering”, however, it is the opinion of the Council that, at this stage, there is insufficient information to confirm that criteria have been met (or otherwise) so as to recognise these as areas of Outstanding Value. With regards to the Graham Bank, as the submitter has recognised, there is insufficient information to determine whether this is an area of outstanding value. At present it is not within the scope of the Council to conduct an investigation into this location in time to determine its value prior to this Plan becoming fully operative.
Further submissions – Trans-Tasman Resources Ltd (6)		Oppose in part	
45 – Powerco	1299	Amend Submitter seeks amendment to Schedules 1 and 2 of the Plan by: <ul style="list-style-type: none"> • mapping the coastal environment line • ensuring that the extent of sensitive coastal management areas (outstanding areas, modified and unmodified estuaries) 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. 	Accept in part A number of submitters have requested to have the coastal environment defined by a line that recognises its extent. Officers recommend granting the relief sought by referencing an “indicative coastal environment line” in the Plan and identifying the coastal environment on relevant planning maps. The indicative nature of this line is to account for any changes to the coastal environment that may occur over time. The coastal environment is a dynamic environment where process of can occur rapidly and induce change to the nature and character of the area and as such the coastal environment line may become redundant or inaccurate in the future due to these changes. The indicative line is useful for identifying whether a particular activity is likely to fall within the coastal

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Further submissions – Transpower NZ Ltd (26)		Support in part	<p>environment, however, proper assessment of the location with regards to coastal features and processes will still be necessary to consider the nature of that location, including the relative significance of any coastal features and characteristics (such matters to be considered on a case-by-case basis through the consenting process).</p> <p>With regards to existing infrastructure, the location of infrastructure has been considered, however, the values associated with these locations are considered to be high enough to afford the protections provided for within the Plan despite any infrastructure that may exist in their vicinity. Further, officers consider it unnecessary and inappropriate to retrospectively amend the extents of any sensitive management areas or their descriptions to simply provide for existing infrastructure.</p> <p>Officers further note that areas of outstanding value are consistent with the extents of outstanding natural feature and landscapes identified by the New Plymouth District Council in the Draft District Plan and South Taranaki District Council. Officers seek, as far as is practicable, alignment and consistency with other Plans within the region.</p>
Further submissions – Fonterra (47)		Support	
46 – Z Energy Ltd, BP Oil Ltd and Mobil Oil NZ Ltd	1300	<p>Amend</p> <p>Submitter seeks amendment to Schedules 1 and 2 of the Plan by:</p> <ul style="list-style-type: none"> • mapping the coastal environment line • 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 Tapuae areas of outstanding value • 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. 	<p>Accept in part</p> <p>A number of submitters have requested that the coastal environment be defined by a line that recognises its extent. Officers recommend granting this relief subject to it being identified as the “indicative coastal environment line”. The indicative nature of this line is to account for any changes to the coastal environment that may occur over time. The coastal environment is a dynamic environment where process of can occur rapidly and induce change to the nature and character of the area and as such the coastal environment line may become redundant or inaccurate in the future due to these changes. The line is useful for identifying whether a particular activity is likely to fall within the coastal environment, however, proper assessment of the location with regards to coastal features and processes will be necessary to determine with complete assurance the nature of that location.</p>
Further submissions – Royal Forest and Bird Protection Society (43)		Oppose	<p>The extents of Nga Motu and Tapuae are considered appropriate having specific regard to the natural character of the location.</p> <p>Officers note that infrastructure has been recognised but is not considered in the assessment contributing to outstanding values. Instead, the areas are evaluated based upon the natural character attributes present and despite any existing infrastructure. Further, officers consider it inappropriate to amend the extents of</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
			<p>any sensitive management areas or their descriptions to reflect existing infrastructure as this would defeat the purpose of the management areas.</p> <p>Officers further note that areas of outstanding value are consistent with the extents of outstanding natural feature and landscapes identified by the New Plymouth District Council in the Draft District Plan and South Taranaki District Council.</p> <p>Officers seek, as far as is practicable, alignment and consistency with other Plans within the region.</p> <p>Officers maintain that the descriptions of coastal management areas are appropriate and that the recognition of existing infrastructure is not necessary.</p>
61 – Te Rūnanga o Ngāti Ruanui Trust	1301	<p>Amend</p> <p>Submitter seeks amendment to Schedules 1 and 2 of the Plan (and associated planning maps) to include and identify as coastal management areas Estuaries Unmodified:</p> <ul style="list-style-type: none"> • Hauroto Stream • Waihi Stream • Katewheta Stream • Waikaikai Stream • Mangaroa Stream • Kaikura Stream • Whenuakura River • Manawapou River. 	<p>Accept in part</p> <p>Officers have assessed the requested locations and have determined that the majority of these streams (Huroto Stream, Waihi Stream, Katewheta Stream, Waikaikai Stream, Mangaroa Stream and Kaikura Stream), although they exist in generally unmodified environments, do not meet the requirement of scale (need to be large) and being permanently open to tidal movements.</p> <p>Officers note that the flow of coastal water upstream of the river mouth depends upon tidal movements and there will be a salinity gradient decreasing upstream from the mouth of the river. The predominance of coastal processes is essential for river mouths to be recognised as estuaries (and thereby covered in the Coastal Plan rather than Freshwater Plan). Without these characteristics these locations cannot be considered estuaries irrespective of the low amounts of development.</p> <p>Notwithstanding the above, officers note that the Whenuakura River has been identified as an area of outstanding value and as a site of significance to Māori providing significant protections for this location. Further, the Manawapou River has also been identified as an unmodified estuary as requested by the submitter.</p>
Schedule 2 – Coastal areas of outstanding value			
6 – Trans-Tasman Resources Ltd	1302	<p>Amend</p> <p>Submitter seeks amendment to Schedule 2 of the Plan 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. 	<p>Decline</p> <p>The ONC6 area was assessed under the outstanding natural character criteria and found to exhibit a very high degree of natural character in all assessment areas which include abiotic attributes (two large adjoining pinnacle reefs which are unusual features on a shelf region dominated by sand), biotic attributes (important kelp beds, a diverse range of fish and encrusting sponge species, and provides a valuable habitat for crayfish) and perceptual and experiential attributes (minimum</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Further submissions – Karen Pratt (9), South Taranaki Underwater Club (10), Department of Conservation (29), Te Rūnanga o Ngāti Mutunga (40), Royal Forest and Bird Protection Society (43), Nga Motu Marine Reserve Society Inc (44), Te Atiawa (58), Te Rūnanga o Ngāti Ruanui Trust (61)		Oppose	human activity and the location experience maintains a high sense of wilderness and remoteness). “Very high” is the highest rating on a 7 point grading system and illustrates unequivocally that this as an area of outstanding natural character as currently determined. These individual assessment criteria contribute to the overall rating for the area as being “outstanding”. Further, officers note strong support for this inclusion from other submitters confirming these values. Officers recommend maintaining ONC6 as an area of outstanding natural character.
9 – Karen Pratt	1303	Support	Accept
		Support inclusion of the Project Reef (ONC6) as an area of outstanding value.	Project Reef (ONC6) is retained as an area of outstanding value as currently notified.
Further submissions – Nga Motu Marine Reserve Society Inc (44), Te Rūnanga o Ngāti Ruanui Trust (61)		Support	
10 – South Taranaki Underwater Club	1304	Support	Accept
		Support inclusion of the Project Reef (ONC6) as an area of outstanding value.	Project Reef (ONC6) is retained as an area of outstanding value as currently notified.
Further submissions – Te Rūnanga o Ngāti Mutunga (40), Nga Motu Marine Reserve Society Inc (44), Te Atiawa (58), Te Rūnanga o Ngāti Ruanui Trust (61)		Support	
11 – Bruce Boyd	1305	Support	Accept
		Support inclusion of the Project Reef (ONC6) as an area of outstanding value.	Project Reef (ONC6) is retained as an area of outstanding value as currently notified.
Further submissions – Nga Motu Marine Reserve Society Inc (44), Te Rūnanga o Ngāti Ruanui Trust (61)		Support	
17 – David Pearce	1306	Amend	Accept
		Submitter seeks 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.	Officers recommend aligning the extent of ONC 8 and ONFL 9 with South Taranaki District Council's Proposed District Plan recognising that the area to be excluded consists of highly modified scrub and farmland.

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Further submissions – Royal Forest and Bird Protection Society (43)		Oppose	
19 – South Taranaki District Council	1307	Support Notes support for aligning areas with outstanding value with South Taranaki's Proposed District Plan.	Accept Support noted.
21 – Climate Justice Taranaki	1308	Amend Submitter seeks amendment to boundaries of ONC 8 and ONFL9 [Waitotara] as an area of outstanding value to align with South Taranaki's Proposed District Plan.	Accept Officers recommend granting the relief sought by the submitter by aligning the extent of ONC 8 and ONFL 9 with South Taranaki District Council's Proposed District Plan – recognising that the area to be excluded consists of highly modified scrub and farmland.
Further submissions – Trans-Tasman Resources Ltd (6)		Neutral in part	
23 – New Plymouth District Council	1309	Support Supports as notified.	Accept Support noted.
Further submissions – Port Taranaki Ltd (32)		Support	
26 – Transpower NZ Ltd	1310	Amend Submitter seeks amendment to Schedule 2 of the Plan and associated planning maps so that the Indicative coastal marine area boundary line on Map 44 is retained, but the Outstanding Value area landward of the Indicative coastal marine area boundary line is moved to align with the Indicative coastal marine area boundary line.	Decline The coastal marine area line does not delineate the maximum extent of the Coastal Plan. The Coastal Plan covers both the coastal marine area and the coastal environment, landward of the indicative coastal marine area boundary line. As such, through analysis of the values and characteristics associated with the outstanding value area (ONC3 and ONFL2), officers recommend to retain the extent of the outstanding value areas to retain the landward component recognising that these values are not only associated with features within the coastal marine area. In addition, officers note that both the Council and the New Plymouth District Council have identified the landward extent of the ONC3 location to extend onto the coastal environment and that Councils that operate across the same regional area should maintain consistency between Planning maps where possible and practical.
30 – First Gas Ltd	1311	Other	No relief necessary

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		Submitter seeks 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.	Officers confirm that the First Gas Pipeline at the Waitotara River is outside the area of outstanding value as identified on planning maps 38-39 (based upon the datasets provided).
Further submissions – Royal Forest and Bird Protection Society (43)		Oppose in part	
44 – Nga Motu Marine Reserve Society Inc	1312	Support Submitter supports the inclusion of eight coastal areas of outstanding value and the nine outstanding natural features or landscapes and, in particular, the inclusion of ONC 6 [Project Reef] and ONC 7 [North and South Traps].	Accept Support noted.
52 – Emily Bailey	1313	Amend Submitter believes that the following locations possess great cultural, ecological, economic and recreational importance and require special protection from development, dredging and uncontrolled recreational disturbance. Submitter seeks amendment to Schedule 2 of the Plan to include the following as areas of outstanding value: <ul style="list-style-type: none"> • Waipapa, Otarāua Road, Waitara • the Waitara Reefs, and • the reefs, tauranga kia/waka and urupā in the following 8 fishing reserves along the coast of Taranaki: Tui Raho (Tuhiraroa), Te Whanganui, Ihurangi, Okawa, Te Ikaroa, Tipoka 55a and 55b, Mataurukuhia, and Te Wairua (Wairoa) (on Waitaha River). 	Decline For a location/site to be classified under the Outstanding Value Coastal Management Area it must be exceptional and meet a strict set of criteria. For this category, locations are required to exhibit very high natural character attributes with regards to abiotic features (natural features), biotic features (distribution, expression/appearance and diversity of species, natural processes and habitats) and perceptual and experiential values. In addition to these qualifiers, locations that have experienced human modification generally cannot be considered to be outstanding due to the modification elements which detract from the natural features, even if such modifications are not obvious to the viewer. Officers do not believe the identified sites meet the outstanding (exceptional) thresholds adopted for the other areas identified as being outstanding natural character and/or outstanding natural features and landscapes. Notwithstanding the above, officers note that these sites have been included within other Schedules because of their 'significant' values. The Plan already recognises the cultural and historic heritage values of these sites (and as identified in the submitter's commentary) as follows: <ul style="list-style-type: none"> • Waipapa, Otarāua Road, Waitara is identified as a site of significance to Māori due to its Māori heritage values. The Schedule numbers are C68 and C67 under Schedule 5B • the Waitara kaawa/reefs have been identified as near shore reefs but do not possess sufficient qualities to be considered under the outstanding value management criteria.
Further submissions – Climate Justice Taranaki Inc (21), Royal Forest and Bird Protection Society (43)		Support	

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
			<ul style="list-style-type: none"> with the eight fishing reserves identified, all of these are recorded as being sites of significance to Māori due to their cultural and historic heritage values but do not possess sufficient qualities to be considered under the outstanding value management criteria.
53 – Taranaki Regional Council	1314	Amend Submitter seeks amendment to Schedule 2 of the Plan to align the mapping of Outstanding Natural Character Areas with those mapped by the South Taranaki District Council through their district plan review.	Accept Mapping of Outstanding Natural Character Areas have been done to align the mapped extents to those mapped by the South Taranaki District Council with the exception of Waitotara (ONC8). Officers recommend aligning the extent of this site to match the extents of Outstanding Natural Character sites identified by the South Taranaki District Council.
Further submissions – Royal Forest and Bird Protection Society (43)		Oppose	
Further submissions – Powerco (45)		Support in part	
61 – Te Rūnanga o Ngāti Ruanui Trust	1315	Amend Submitter seeks amendment to Schedule 2 of the Plan (and associated planning maps) to include and identify as coastal management areas Outstanding Value: <ul style="list-style-type: none"> Tangahoe - Hawera – Manutahi Reef system Patea Beach Patea River Estuary Ohawe Beach Manawapou Beach Waihi Beach. 	Decline / Accept in kind For a location/site to be classified under the Outstanding Value Coastal Management Area it must be exceptional and meet a strict set of criteria. For this category, locations are required to exhibit very high natural character attributes with regards to abiotic features (natural features), biotic features (distribution, expression/appearance and diversity of species, natural processes and habitats) and perceptual and experiential values. In addition to these qualifiers, locations that have experienced human modification generally cannot be considered to be outstanding due to the modification elements which detract from the natural features, even if such modifications are not obvious to the viewer. Officers do not believe the identified sites meet the outstanding (exceptional) thresholds adopted for the other areas identified as being outstanding natural character and/or outstanding natural features and landscapes. However, officers believe that these sites could be included within other Schedules because of their 'significant' values. Schedule 5B of the Plan already recognises sites of significance to Māori and believe that some of these sites maybe better identified in that Schedule. This will be discussed further with the submitter as part of the pre-hearing engagement. Also of note, the Patea beach lies within the Estuary Modified coastal management area and, as such, has a higher level of regulatory protection.
Further submissions – Climate Justice Taranaki Inc (21), Royal Forest and Bird Protection Society (43)		Support	
	1316	Support	Accept

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
61 – Te Rūnanga o Ngāti Ruanui Trust		Submitter supports the identification and inclusion of the Whenuakura River Estuary in Schedules 1 and 2 of the Plan as an area of outstanding value.	Support for inclusion of Whenuakura River Estuary is noted.
Schedule 2 – Coastal areas of outstanding value / Schedule 9 – Documents incorporated by reference			
43 – Royal Forest and Bird Protection Society	1317	<p>Amend</p> <p>Submitter seeks amendment to Schedule 2 of the Plan to incorporate by reference (Schedule 9) the report <i>Regional landscape study of the Taranaki coastal environment</i> (2015).</p>	<p>Decline</p> <p>Part 3 [Incorporation of documents by reference in plans and proposed plans] of Schedule 1 of the RMA states that documents that are standards, requirements or recommended practices of international or national organisations; standards, requirements or recommended practices prescribed in any country or jurisdiction; and any other written material that deals with technical matters and is too large or impractical to include in, or print as part of the plan or proposed plan can be incorporated by reference. These documents will have legal effect as part of the plan or proposed plan.</p> <p>Officers do not believe the document requested fits any of the required criteria to be considered an appropriate document to incorporate by reference and has only been referenced in Schedule 2 in order to provide additional background information for the reader's information.</p>
Schedule 2 – Coastal areas of outstanding value			
43 – Royal Forest and Bird Protection Society	1318	<p>Amend</p> <p>Submitter seeks amendment to Schedule 2 of the Plan (or include a new Schedule) and associated planning maps to identify areas of high natural character and include the values and characteristics of identified areas.</p>	<p>Decline</p> <p>The request would introduce an unnecessary level of detail that does not link with Policy 9 [Natural character and natural features and landscapes] or Policy 10 [Restoration of natural character]. The degree of natural character can be considered through the consenting process along with other values.</p>
Schedule 4 – Significant indigenous biodiversity			
43 – Royal Forest and Bird Protection Society	1319	<p>Amend</p> <p>Submitter seeks amendment to Schedule 4 [Significant indigenous biodiversity] of the Plan to identify areas of significant indigenous biodiversity in the coastal marine area, including the values and characteristics that contribute to the significance of each area. Areas identified are to include the 'significant coastal areas' identified in the New Plymouth District Plan and the relevant Important Bird Areas for New Zealand Seabirds as show in Appendix 3 to this submission).</p>	<p>Accept in part</p> <p>As noted in the Section 32 Evaluation Report, the Council does not believe any organisation has the required datasets to accurately map all aspects of significant indigenous biodiversity with any certainty.</p> <p>Agencies with monitoring roles for biodiversity include the Department of Conservation, regional councils, district councils, Ministry for Primary Industries, Environmental Protection Authority, and Maritime New Zealand. However, data</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Further submissions – Federated Farmers (2)		Support in part	<p>and knowledge gaps make biodiversity mapping especially challenging. There is no accurate national or regional dataset. One of the challenges for accurately mapping biodiversity is accessing data of sufficient quality and breadth to be confident that all aspects of biodiversity can be adequately mapped. Officers are concerned that Taranaki, as with the rest of New Zealand, has incomplete information and that mapping sites based upon information we currently have (such as SNAs, KNEs) would have a perverse outcome in that it provides less protection for those aspects of biodiversity that were not mapped. The situation is even worst when it comes to species information.</p> <p>The Council's preferred approach is to clearly identify those aspects of biodiversity (through Policy 14) that require a higher level of protection by avoiding the adverse effects of activities. Officers believe the current protections give effect to Policy 11 [Indigenous biological diversity (biodiversity)] of the <i>New Zealand Coastal Policy Statement</i>.</p> <p>Notwithstanding the above, officers have reviewed spatial information to ascertain whether any additional biodiversity mapping overlays can be provided. As a result it is recommended that the Important Bird Areas for New Zealand that occur within the Taranaki region be included as a planning layer alongside the Maui dolphin sanctuary and that appropriate policy linkages be made as a consequential amendment.</p>
Further submissions – Federated Farmers (2), Powerco (45)		Oppose in part	
Further submissions – Climate Justice Taranaki Inc (21)		Support	
Schedule 4A – Significant species and ecosystems			
6 – Trans-Tasman Resources Ltd	1320	<p>Amend</p> <p>Submitter seeks 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>	<p>Decline</p> <p>The submitter considers it inappropriate to include a list of significant species and ecosystems based on the threat classification status given the classification status are reviewed every three years whereas the Coastal Plan is expected to have a ten year life. If the schedule is to remain, the submitter considers that it should be amended to remove reference to non-threatened flora and fauna, and at risk species unless they are declining.</p> <p>Policy 11 [indigenous biological diversity] of the <i>New Zealand Coastal Policy Statement</i> sets out the requirements for protection of indigenous species. These protections are not limited to species that are considered threatened and officers note that there is much more scope within the Policy to identify other species of importance.</p> <p>Officers note that the Policy provision for threatened species (Policy 14 [Indigenous biodiversity] (a)(i) and (ii)) have been framed to "include" those species listed in</p>
Further submissions – South Taranaki Underwater Club (10), Climate Justice Taranaki Inc (21), Department of Conservation (29), Te Rūnanga o Ngāti Mutunga (40), Te Korowai o Ngāruahine Trust (41), Royal Forest and Bird Protection Society (43), Te Atiawa (58), Te Rūnanga o Ngāti Ruanui Trust (61)		Oppose	

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
			<p>Schedule 4A, therefore, the policy references the schedule but does not depend upon the schedule, allowing flexibility with any changes that may occur during the life of the Plan.</p> <p>Officers consider that the inclusion of Schedule 4A will further ensure that the appropriate measures are taken with regards to threatened species and removal of the schedule will reduce the effectiveness of the protections provided through the policies.</p> <p>Further, inclusion of regionally significant species is consistent with the <i>Regional Policy Statement</i> that significant indigenous biodiversity includes the distinctive criterion whereby added protection is provided to species that are important in the local context. Therefore, officers strongly recommend to retain Schedule 4A [Significant species and ecosystems] as currently notified.</p>
29 – Department of Conservation	1321	<p>Amend</p> <p>Submitter seeks amendment to Schedule 4A of the Plan to include maps of areas, ecosystems, and habitats that have significant indigenous biodiversity values.</p>	<p>Decline</p> <p>Agencies with monitoring roles for biodiversity include the Department of Conservation, regional councils, district councils, Ministry for Primary Industries, Environmental Protection Authority, and Maritime New Zealand. Officers do not believe any of these agencies are in a position to supply a complete and accurate record of significant indigenous biodiversity in Taranaki.</p> <p>It is officers' view that data and knowledge gaps make biodiversity mapping especially challenging. There is no accurate national or regional dataset. One of the challenges for accurately mapping biodiversity is accessing data of sufficient quality and breadth to be confident that all aspects of biodiversity can be adequately mapped. Officers are concerned that Taranaki, as with the rest of New Zealand, has incomplete information and that mapping sites based upon information we currently have (such as SNAs, KNEs) would have a perverse outcome in that it provides less protection for those aspects of biodiversity that were not mapped. The situation is even worse when it comes to species information.</p>
Further submissions – Federated Farmers (2), Trans-Tasman Resources (6), Te Rūnanga o Ngāti Ruanui Trust (61)		Support	
Further submissions – Powerco (45)		Support in part	
43 – Royal Forest and Bird Protection Society	1322	<p>Amend</p> <p>Submitter seeks amendment to Schedule 4A of the Plan by identifying and mapping the locations where rare and uncommon ecosystem types identified in the schedule occur.</p>	<p>Decline</p> <p>Mapping of rare and uncommon ecosystems has not been undertaken due to insufficient information regarding the locations and extents of where these occur. Officers note that many of these locations occur landward of the coastal marine</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Further submissions – Trans-Tasman Resources Ltd (6)		Support in part	area making the majority of these locations redundant to the purposes of this Plan. Further many of these locations will be very small scale and may be difficult to include within the planning maps.
Further submissions – Climate Justice Taranaki Inc (21), Te Rūnanga o Ngāti Ruanui Trust (61)		Support	<p>The relevant agencies that monitoring roles for biodiversity include the Department of Conservation, regional councils, district councils, Ministry for Primary Industries, Environmental Protection Authority, and Maritime New Zealand and the Council considers it unreasonable to expect this agency to conduct such a detailed, fine scale and sensitive analysis out of all other relevant agencies.</p> <p>Officers are unwilling to include any mapping that is likely to be incomplete as it is likely to produce a perverse outcome in that it provides less protection for those rare and uncommon ecosystem types that were not mapped.</p> <p>It may be possible to include this information in future Plans once the necessary monitoring, data collection and analysis has been conducted, however, officers recommend to not include mapped locations for rare and uncommon ecosystems.</p>
43 – Royal Forest and Bird Protection Society	1323	Amend	Accept in part
		Submitter seeks amendment to Schedule 4A of the Plan 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.	Non vascular plants are not consistently recorded during site surveys in Taranaki therefore there is insufficient information to identify which threatened, at risk or data deficient species may be present in the region. The Department of Conservation also do not hold this type of distributional data and officers are concerned that the identification and incorporation of incomplete information at this scale would be detrimental to the Plan.
Further submissions – Trans-Tasman Resources Ltd (6)		Oppose in part	Officers will update the schedule on data deficient marine species to assure it provides the most up to date information.
Further submissions Te Rūnanga o Ngāti Ruanui Trust (61)		Support	Officers welcome any views they may have regarding any missing regionally distinctive species, however, do not consider the common dolphin to be regionally distinctive due to its prevalence throughout New Zealand waters. In response to the submitter's request, officers sought advice from the Department of Conservation in relation to candidate marine species that warrant being identified as 'regionally distinctive'. Subsequently amendments have been made to Schedule 4A to identify seven additional marine algae, fish and mammal species as regionally distinctive.
55 – Kiwis Against Seabed Mining	1324	Amend	Accept in part
		Submitter seeks amendment to Schedule 4A of the Plan by mapping to identify all significant areas, including the spatial extent of intrinsic relationship and	Mapping biodiversity values within the coastal marine area is a particularly difficult tasks primarily due to insufficient data sets. Further, there is a risk in providing

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		biodiversity, to provide for the maintenance and enhancement of biodiversity in the wider coastal marine area.	<p>incomplete information in Plans such as this as it may produce a perverse outcome for those areas that have not been mapped or do not possess sufficient information to accurately determine the spatial values.</p> <p>Notwithstanding the above, officers have reviewed spatial information to ascertain whether any additional biodiversity mapping overlays can be provided. As a result it is recommended that the Important Bird Areas for New Zealand that occur within the Taranaki region be included as a planning layer alongside the Maui dolphin sanctuary and that appropriate policy linkages be made as a consequential amendment.</p>
55 – Kiwis Against Seabed Mining	1325	<p>Amend</p> <p>Submitter seeks amendment to Schedule 4 of the Plan so that rules that prohibit or restrict activities in fishing, seabed mining and oil and gas, in relation to the values of the area, are identified through marine spatial planning.</p>	<p>Decline</p> <p>Officers recommend declining the relief sought by the submitter in that rules in the Plan are confined to giving effect to the RMA and the Council's jurisdictional responsibilities pertaining to the coastal marine area. It is not for the Plan to get into areas covered by other authorities, statutes or jurisdictions.</p>
Further submissions – Ministry for Primary Industries (16)		Oppose	
56 – Greenpeace	1326	<p>Amend</p> <p>Submitter seeks amendment to Schedule 4A of the Plan by mapping to identify all significant areas, including the spatial extent of intrinsic relationship and biodiversity, to provide for the maintenance and enhancement of biodiversity in the wider coastal marine area.</p>	<p>Accept in part</p> <p>Mapping biodiversity values within the coastal marine area is a particularly difficult tasks primarily due to insufficient data sets. Further, there is a risk in providing incomplete information in Plans such as this as it may produce a perverse outcome for those areas that have not been mapped or do not possess sufficient information to accurately determine the spatial values.</p> <p>Notwithstanding the above, officers have reviewed spatial information to ascertain whether any additional biodiversity mapping overlays can be provided. As a result it is recommended that the Important Bird Areas for New Zealand that occur within the Taranaki region be included as a planning layer alongside the Maui dolphin sanctuary and that appropriate policy linkages be made as a consequential amendment.</p>
56 – Greenpeace	1327	<p>Amend</p> <p>Submitter seeks amendment to Schedule 4 of the Plan so that rules that prohibit or restrict activities in fishing, seabed mining and oil and gas, in relation to the values of the area, are identified through marine spatial planning.</p>	<p>Decline</p> <p>Officers recommend declining the relief sought by the submitter in that rules in the Plan are confined to giving effect to the RMA and the Council's jurisdictional</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
Further submissions – Ministry for Primary Industries (16)		Oppose	responsibilities pertaining to the coastal marine area. It is not for the Plan to get into areas covered by other authorities, statutes or jurisdictions.
Schedule 4B – Sensitive marine benthic habitats			
6 – Trans-Tasman Resources Ltd	1328	Amend Submitter seeks amendment to the Plan by deleting Schedule 4B in its entirety.	Decline Sensitive benthic habitats refer to marine habitats identified in the report <i>Sensitive habitats and threatened species in the Taranaki coastal marine area (TCMA) – database investigation</i> . These areas of marine habitat have been identified to have a low tolerance to habitat damage and for which the time for the habitat to recover from any damage would be significant. As part of a precautionary approach and given the sensitivity and vulnerability of such marine habitats, officers consider it appropriate that they be recognised and provided for within the Plan which requires reference to Schedules. Therefore, officers recommend to retain Schedule 4B [Sensitive marine benthic habitats] in its entirety as currently notified.
Further submissions – South Taranaki Underwater Club (10), Climate Justice Taranaki Inc (21), Department of Conservation (29), Te Rūnanga o Ngāti Mutunga (40), Royal Forest and Bird Protection Society (43), Te Atiawa (58), Te Rūnanga o Ngāti Ruanui Trust (61)		Oppose	
Schedule 4C – Significant taonga species			
61 – Te Rūnanga o Ngāti Ruanui Trust	1329	Amend Submitter seeks amendment to the Plan by including a new Schedule 4C that identifies taonga species under the <i>Ngāti Ruanui Claims Settlement Act 2003</i> : <ul style="list-style-type: none"> • Hapuka / Groper (<i>Polypio oxygenios</i>) • Kaeo / Sea tulip (<i>Pyrua pachydermatum</i>) • Kahawai / Sea trout (<i>Arripus trutta</i>) • Kanae / Mullet (<i>Mugil cephalus</i>) • Koeke / Common Shrimp (<i>Palaemon affinis</i>) • Marari / Butterfish (<i>Odax pullus</i>) • Moki / Blue moki (<i>Latridopsis ciliaris</i>) • Paraki/Ngaiore / Common Smelt (<i>Retropinna retropinna</i>) • Para / Frostfish (<i>Lepidopus caudatus</i>) • Patiki mahoao / Black Flounder (<i>Rhombosolea retiaria</i>) • Patiki rore / New Zealand sole (<i>Peltorhamphus novaezeelandise</i>) • Pakiti tore / Lemon sole (<i>Pelotretis flavilatus</i>) 	Accept Officers recognise that taonga species have important cultural value to Māori and recommend including a new Schedule (Schedule 4C [Taonga Species]) to identify those species that hold significant value to local iwi. These species are to be identified through the iwi deeds of settlement as recorded and to be confirmed through further pre-hearing engagement.

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		<ul style="list-style-type: none"> • Patiki totara / Yellow belly flounder (<i>Rhombosolea leporina</i>) • Patiki / Sand flounder (<i>Rhombosolea plebeia</i>) • Patukituki / Rock cod (<i>Parapecis colias</i>) • Pioke / Rig shark (<i>Galeorhinus galeus</i>) • Reperepe / Elephant fish (<i>Callorhynchus milli</i>) • Tuna heke / Eel – long finned (<i>Anguilla dieffenbachi</i>) • Tuna roa / Eel –short finned (<i>Anguilla australis</i>) • Wheke / Octopus (<i>Octopus maorum</i>) • Koiro, ngoiro, totoke, hao, ngoio, ngoingoi, putu / Conger Eel (<i>Conger verreauxi</i>) • Koura / Crayfish (<i>Jasus edwardsii</i>) • Kaunga / Hermit Crab (<i>Pagurus novaeseelandiae</i>) • Papaka parupatu / Mud Crab (<i>Helice sp.</i>) • Papaka / Paddlecrab (<i>Ovalipes catharus</i>) • Kotere, humenga / Sea anemoe (<i>Cnidaria</i> group) • Rore, rori / Sea cucumber / sea snail <i>Stichopus mollis</i>) • Patangatanga, patangaroa, pekapeka Starfish (<i>Echinoderms</i>) • Kina / Sea urchin (<i>Evechinus chloroticus</i>) • Kuku / Kutae Green lipped mussel (<i>Perna canaliculus/mytilus edulis</i>) • Kuku / Kutae Blue lipped mussel (<i>Perna canaliculus/mytilus edulis</i>) • Paua / Paua – black foot (Abalone) (<i>Haliotis iris</i>) • Paua / Paua – yellow foot (<i>Haliotis australis</i>) • Pipi/kakahi / Pipi (<i>Paphies austral</i>) • Pupu / Pupu (Turbo smaragdus/zediloma spp) • Purimu / Surf clam (<i>Dosinia anus et al.</i>) • Rori / Sea snail (<i>Scutus breviculus</i>) • Tuangi / Cockle (<i>Austrovenus stutchburgi</i>) • Tuatua / Tuatua (<i>Paphies subtriangulata, paphies donacina</i>) • Waharoa / Horse mussel (<i>Atrina zelandica</i>) 	

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
		<ul style="list-style-type: none"> • Waikaka / Mud snail (<i>Amphibola crenata</i>, <i>Turbo smaragus</i>, <i>Zedilom spp.</i>) • Tio, Karauria, ngahiki, repe / Rock Oyster (<i>Crassostrea glomerata</i>) • Tupa, kuakua, pure, tipa, tipai, kopa / Scallop (<i>Pecten novazelandiae</i>). 	
Further submissions – Trans-Tasman Resources Ltd (6)		Oppose	
Further submissions – Te Korowai o Ngāruahine Trust (41)		Support	
Schedule 5A – Archaeological sites of significance and historic areas			
50 – Te Kāhui o Taranaki Trust	1330	<p>Amend</p> <p>Submitter seeks amendment to Schedule 5A of the Plan (and associated planning maps) by deleting the archaeological site names and instead give the sites a number and scheduling system identical to the mapped Taranaki Iwi sites of significance in the Plan.</p>	<p>Decline</p> <p>Officers are unsure about the intent and exact request by the submitter, however, with regards to the names of archaeological sites of significance, officers consider the names to be important identifiers that will aid Plan users. Many of these sites are already identified in other Council reports that do not follow a numbering system and removing names would make it difficult to cross reference to these documents resulting in a potentially limited understanding of the scope and values associated with the location.</p> <p>However, officers are willing to discuss the submitter's concerns in pre-hearing consultation and amend the Plan if necessary.</p>
57 – Heritage New Zealand	1331	<p>Amend</p> <p>Submitter seeks amendment to the title of Schedule 5A of the Plan to read: <i>Archaeological sites of significance, <u>built heritage</u> and historic areas.</i></p>	<p>Decline</p> <p>Officers recognise that Schedule 5A [Archaeological sites of significance and historic areas] contains built heritage within its list of sites (for example power station and wharf structures), however, do not consider it necessary to explicitly recognise these within the title as built heritage has not been recognised across the board. Built heritage sites that have been included also contains archaeological or historic values and officers recognise that built heritage has a much broader scope. Further, built heritage is considered implicit within the main title (Historic heritage) and also Schedule 5A title with reference to historic areas. The definition of historic heritage is taken from the RMA which includes within its description built heritage. Lack of explicit mention within a title does not mean it is precluded. Officers recommend to retain the title for Schedule 5A as currently notified.</p>

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
57 – Heritage New Zealand	1332	Amend	Accept in part
		<p>Submitter seeks amendment to the maps within Schedule 5A to reduce ambiguity of mapped sites by:</p> <ul style="list-style-type: none"> mapping the extent of scheduled sites (if site extents are unknown use buffer zones) connecting sites on the maps with specific scheduled sites specifying dates for all sites. 	<p>Officers recommend granting the relief sought in part as follows:</p> <ul style="list-style-type: none"> the archaeological sites of significance listed in Schedule 5A do not contain polygons. The Council does not consider it appropriate to include buffer zones and would prefer to manage these sites on a case-by-case basis through the consenting process having regard for the particular activity and likely effects occurring within their vicinity. Officers recommend to retain the point locations of archaeological sites of significance as currently notified with regards to connecting sites identified on maps with the schedules, officers recommend to add the listing number that appears in the far left column of the schedule, to the pop up information on the planning maps to aid users in identifying specific locations within the map and correlating them to the relevant information within the schedules dates have been included in the Schedules for as many sites as are known. Any missing information is intentional due to a lack of reliable recorded data, however, officers would welcome any additional information that the submitter may be able to provide. Officers recommend to retain the dates for Schedule 5 as currently notified unless further information is provided.
57 – Heritage New Zealand	1333	Amend	No relief required
		<p>Submitter questions the rationale for why two sites in the Scoping Study were not included in the Schedule and when the Scoping Study will be updated.</p>	<p>Review of the Scoping Study has revealed only one site that has not been included within the Plan: the Railway Wharf, Waitara. The location of this wharf (as determined within the Scoping study) at its most northerly extent, began at high street and extended southwards, meaning that this site is outside the coastal marine area. The Scoping study will most likely be reviewed in preparation for the next Coastal Plan review in 10 years.</p>
Schedule 5B – Sites of significance to Māori and associated values			
15 – Surfbreak Protection Society	1334	Support	No relief necessary
		<p>Submitter support the inclusion of sites of significance to Māori and associated values in the list of Schedules.</p>	<p>Support noted.</p>
	1335	Amend	Decline

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
21 – Climate Justice Taranaki		Submitter seeks amendment to Schedule 5B of the Plan to include sites of significance to Ngāti Maru.	The Ngāti Maru rohe does not extend to the coastal environment or the coastal marine area, nevertheless, the Council recognises that there still may be sites of significance to Ngāti Maru despite their geographic location. Officers note that Ngāti Maru have not provided comment on the Coastal Plan and have not requested correspondence with the Council to discuss any sites of significance that may be affected by the Coastal Plan. Ngāti Maru have received correspondence from the Council informing them of the Proposed Coastal Plan and have had the opportunity to respond. It is not the Council's intent to include this information without the request and/or approval of the relevant iwi authorities.
40 – Te Rūnanga o Ngāti Mutunga	1336	Amend	Accept
		Submitter supports the inclusion of sites of significance to Te Rūnanga o Ngāti Mutunga and associated values in the list of Schedules but seek the inclusion of additional sites.	Comments noted. Officers will be consulting further with the submitter as part of pre-hearing consultation to investigate the inclusion of additional sites of significance.
41 – Te Korowai o Ngāruahine Trust	1337	Neutral	No relief necessary
		Submitter would like the opportunity to amend and refine Schedule 5B as required as Ngāruahine hapū progress the claims under the <i>Takutai Moana Act 2011</i> .	Comments noted. Officers recognise that successful claims under the <i>Takutai Moana Act 2011</i> would result in legislative recognition of sites that would come under Schedule 5B [Sites of Significance to Māori]. Officers will allow review of the Schedule at a designated time, within the life of the Plan, in order to incorporate additional sites that have been recognised through the <i>Takutai Moana Act 2011</i> .
Further submissions – Te Rūnanga o Ngāti Mutunga (40), Te Atiawa (58)		Support	
42 – Ngati Hine Hapu of Te Atiawa	1338	Amend	Accept
		Submitter seeks amendment to the Plan to include sites of significance to Ngati Hine Hapu of Te Atiawa (and not information contained in the New Plymouth Draft District Plan).	Comments noted. Officers note that Te Atiawa iwi has directed Council to liaise with their hapū as part of Coastal Plan engagement, including the identification of sites of significance. Officers will be consulting further with the submitter as part of pre-hearing consultation to investigate the inclusion of additional sites of significance.
57 – Heritage New Zealand	1339	Amend	No relief necessary
		Submitter seeks amendment to the maps within Schedule 5B of the Plan using polygons to more accurately define the extent of the sites of significance to Māori.	Sites of significance to Māori have been identified by the local iwi and hapū through Council interaction and communication. The sites listed in Schedule 5B are delineated using polygons as identified in these meetings. Officers do not consider it necessary to review these sites without the expressed request from iwi/hapū themselves.

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
57 – Heritage New Zealand	1340	Amend	Accept
		Submitter seeks amendment to the Ohunuku map (Ngāruahine) with appendix information supplied by the Heritage New Zealand submission.	Officers note that the submitters request was proposed to Ngāruahine who have indicated their support for the amendment as sought by the submitter but also wish the site spelling to be corrected to Ōhounuku. Officers agree to amend the site extent and spelling as requested.
60 – Te Kaahui o Rauru	1341	Amend	Accept
		Submitter seeks amendment to Schedule 5B of the Plan - Ngaa Rauru Kiihahi by: <ul style="list-style-type: none"> including schedule from <i>Ngaa Rauru Kiihahi Claims Settlement Act 2005</i> amending site extents including Tapuarau Conservation Area. 	The Tapuarau Conservation area is currently identified as an area of outstanding value under Schedule 1 and the Waitotara estuary has been identified as a site of significance to Māori. Officers note that final confirmation of sites of significance to Ngaa Rauru Kiihahi (including their extents) will be subject to further discussion and engagement. This will include discussing the historic heritage and associated cultural values connected to the Tapuarau Conservation area in order to determine if it should also be included within Schedule 5B [Sites of significance to Māori].
Further submissions – Te Rūnanga o Ngāti Mutunga (40), Te Atiawa (58)		Support	
61 – Te Rūnanga o Ngāti Ruanui Trust	1342	Amend	Decline
		Submitter seeks amendment to Schedule 5B of the Plan by amending the heading to read: <i>Schedule 5 – <u>Cultural and</u> historic heritage</i>	Officers note that “historic heritage” has a broad definition under Section 2 of the RMA and includes sites of significance to Māori. Section 2 definition of “historic heritage” reads as follows: <i>“...historic heritage means:</i> <i>(a) those natural and physical resources that contribute to an understanding and appreciation of New Zealand’s history and cultures, deriving from any of the following qualities:</i> <i>(i) archaeological,</i> <i>(ii) architectural,</i> <i>(iii) cultural,</i> <i>(iv) historic, [...].”</i> The term cultural heritage potentially has a much broader meaning. Therefore, officers recommend to retain the title for Schedule 5 as currently notified.
	1343	Amend	Accept in part

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
61 – Te Rūnanga o Ngāti Ruanui Trust		In relation to sites of significance to Ngāti Ruanui, submitter seeks amendment to Schedule 5B of the Plan (noting information is to follow) to include information on: <ul style="list-style-type: none"> • Te Moananui A O Ngāti Ruanui (Coastal Area) • Waingongoro River • Manawapou River • Waihi Stream • Katewheta Stream • Waikaikai Stream • Mangaroa Stream • Kaikura Stream • Whitikau • Tangahoe-Hawera-Manutahi Reef. 	Officers will be discussing the location and details of the sites identified with the submitter during the pre-hearing consultation process.
Further submissions – Trans-Tasman Resources Ltd (6)	Oppose		
Further submissions – Te Rūnanga o Ngāti Mutunga (40), Te Atiawa (58)	Support		
Schedule 7A – Surf breaks			
5 – Point Board Riders	1344	Amend Submitter supports the inclusion of the designated Significant Surfing Area as an overlay in Schedule 7B for protection but submit that the area from Pungarehu to Okato is only a small area and seek to have more of the coastline added to the overlay.	Decline Support noted. In relation to extending the Significant Surfing Area the area identified was a result of expert advice arising from the report <i>Regional significance criteria for the assessment of surf breaks</i> by Shane Orchard, highlighting the abundance, uniqueness and large number of high quality surf breaks in the locality. No change is recommended. However, officers note that regionally significant surf breaks outside the area still have a high level of protection in accordance with Policy 19 [Surf breaks and significant surfing area].
5 – Point Board Riders	1345	Amend Submitter supports the inclusion of Nationally Significant surf breaks and Locally Significant surf breaks but raise the issue of a lack of protection for the remaining surf breaks on the coast.	Decline Officers are not currently aware of any additional surf break locations that are not already included within Schedule 7 and have worked closely with the local surfing community in addition to commissioning a report on regionally significant

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
			surfbreaks and undertook a surfing community survey to establish the current list. The intention of Schedule 7 is to provide a high level of protection to those surfbreaks that display significant surfing qualities through Policy 19 [Surf breaks and Significant Surfing Area]. The Council will welcome any additional information for the inclusion of other surfbreaks where it can be demonstrated they have regionally important surfing qualities.
15 – Surfbreak Protection Society	1346	<p>Amend</p> <p>Submitter supports the inclusion of the designated Significant Surfing Area but seeks that it be extended to include a larger area and that more surf breaks be added to the locally significant list.</p>	<p>Decline</p> <p>Officers consider the extents of the Significant Surfing Areas to be sufficient and recognise that, due to tidal changes and changing weather conditions, a surfable area may be larger or smaller than the area identified in the maps. The polygons depicted are intended to capture the commonly utilised areas on any given day. Officers are not currently aware of any additional surf break locations that are not already included within Schedule 7 and have worked closely with the local surfing community in addition to commissioning a report and undertaking a surfing community survey on regionally significant surfbreaks to establish the current list. The intention of schedule 7 is to provide a high level of protection to those surfbreaks that display significant surfing qualities through Policy 19 [Surf breaks and Significant Surfing Area]. The Council will welcome any additional information for the inclusion of other surfbreaks if they can be valued for their surfing qualities.</p>
18 – Surfing Taranaki	1347	<p>Support</p> <p>Support the designated Significant Surfing Area as proposed in the Plan.</p>	<p>No relief required</p> <p>Support noted.</p>
19 – South Taranaki District Council	1348	<p>Amend</p> <p>Support the inclusion of the designated Significant Surfing Area but seeks that it be confined to the coastal marine area.</p>	<p>Accept</p> <p>Officers note the submitter's concern and recommend amending the landward extent of the significant surf break area to align with the indicative coastal marine area line so as to not capture private land.</p>
Further submissions – Powerco (45)		Support in part	
20 – Meridian Energy Limited	1349	<p>Amend</p> <p>Submitter seeks amendment to the Plan and associated Planning Maps to show the locations of locally significant surf breaks.</p>	<p>Accept</p> <p>Officers agree to amend the maps to identify the locations of locally significant surf breaks.</p>
	1350	Amend	Accept

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
24 – Paora Aneti 17 & 18 Māori Reservation Trustees		Submitter opposes the inclusion of sections of Paora Aneti 18 amongst surf breaks identified as nationally or regionally significant.	Officers note the submitter's concern and recommend amending the landward extent of the significant surf break area to align with the indicative coastal marine area line so as to not capture private land.
24 – Paora Aneti 17 & 18 Māori Reservation Trustees	1351	Other	Accept
		Submitter suggests the Plan shows a lack of regard to the Māori language by having an area for surfing identified as "Punihos".	The submitter has not specifically sought any amendments to the Plan. However, officers recommend amending the name of the surf break to Puniho in response to their concerns. Further, officers have begun investigating additional name changes for surf breaks identified in Schedule 7 in relation to Māori names and/or naming protocols and will also meet with submitters to confirm any changes in the pre-hearing consultation process to improve the Plan.
31 – Komene 13B Māori Reservation Trustees	1352	Amend	Accept
		Submitter opposes the inclusion of sections of Komene 13 Māori Reservation via Waikirikiri Lagoon in the Plan, including the surf break area AND Note that "Waikirikiri" is not the name of the area.	Officers notes the submitter's comments and recommend amending the landward extent of the significant surf break area to align with the indicative coastal marine area line so as not to inadvertently capture private land. Officers also note the name is incorrect and will discuss appropriate amendments for this, and other names, with submitters through the pre-hearing consultation process.
32 – Port Taranaki Ltd	1353	Amend	Decline
		Submitter seeks amendment to Schedule 7A of the Plan to delete the "Breakwater" surf break from the list of regionally significant surf breaks, and delete references to it on associated maps.	Officers assume that the submitters concern relate to the levels of protection afforded to regionally significant surf breaks and the operational implications of recognising the "breakwater" as a regionally significant surf break. Officers offer assurance to the submitter that these issues are recognised and have been addressed in Policy 19(b) which recognises that strict avoidance of effects on regionally significant surf breaks by regionally important infrastructure such as the Port might not always be practicable (in which case a mitigation hierarchy to manage effects applies).
49 – Cam Twigley	1354	Amend	No relief necessary
		Submitter supports the inclusion (and its extent) of the designated Significant Surfing Area.	Support noted.
	1355	Amend	Decline

Submitter	Submission point	Submitter's requests	Officers' recommendation and response
50 – Te Kāhui o Taranaki Trust		Submitter seeks amendment to Schedule 7A of the Plan (and associated planning maps) by deleting the surf break names instead give the sites a number and scheduling system identical to the mapped Taranaki lwi sites of significance in the Plan.	Officers consider the surfbreak names to be important and useful identifiers of surfbreaks that will aid Plan users in this area. Submitters have made officers aware that some of the surfbreak names as currently notified are offensive and inappropriate and officers will be approaching local iwi as well as surf groups through the pre- hearing consultation process in order to establish an accurate and culturally appropriate set of surfbreak names.
50 – Te Kāhui o Taranaki Trust	1356	Amend Submitter seeks amendment to Schedule 7A of the Plan (and associated planning maps) by delineating the surf breaks in terms of location like the Taranaki lwi sites of significance.	Decline Surfbreak locations have not been delineated by the Council. Delineating surf breaks would be an imprecise and expensive exercise and was not considered necessary for the purposes of this review. However point locations will be added to the planning maps to identify where the surfbreaks occur within the coastal marine area.
Schedule 8 – Port air zone			
32 – Port Taranaki Ltd	1357	Amend Submitter seeks amendment to Schedule 8 of the Plan (and associated maps) to include the wharves in the Port Air Zone and correspond to the online maps for the Port Air Zone.	Accept Officers recommend amending Schedule 8 to include wharves within the Port Air Zone to be consistent with the areal extent of maps online.
Schedule 9 – References			
48 – Taranaki District Health Board	1358	Amend Submitter seeks amendment to Schedule 9 of the Plan to read: <i>The documents referenced throughout the Plan are listed below, along with the website addresses that provide access to the documents. <u>Note that New Zealand Standards listed below are subject to copyright and are not available to be viewed on-line and may be inspected by appointment at our customer service centre.</u></i> [...] <u>Noise standards (Rules 6.10, 8.6.3)</u> <u>NZS 6801:2008 Acoustics – Measurement of Environmental Sound</u> <u>NZS 6802:2008 Acoustics – Environmental Noise</u> <u>NZS 6803:1999 Acoustics – Construction noise</u> <u>NZS 6809:1999 Acoustics – Port Noise and Land Use Planning</u>	Accept Officers recommend amending the Plan to include reference to the requested standards in Schedule 9.

