



FURTHER SUBMISSION IN SUPPORT OF, OR IN OPPOSITION TO, A SUBMISSION ON NPDC'S NOTIFIED PROPOSED DISTRICT PLAN

Clause 8 of Schedule 1 Resource Management Act 1991

To: New Plymouth District Council
Address: Private Bag 2025, New Plymouth 4342
Email: districtplan@npdc.govt.nz

Further Submitter Details

Name of further submitter: Todd Energy Limited
Contact person (if different from above) Nik Pyselman
Postal address: PO Box 802, New Plymouth. 4340
Email address for service: npyselman@toddenenergy.co.nz
Phone number: 0272 296 334

The Council will serve all formal documents by email. Where there is no email address provided, the documents will be posted to the postal address stated above.

I am: (please tick relevant box)

- a) A person representing a relevant aspect of the public interest.
b) A person who has an interest in the proposal that is greater than the interest of the general public.
c) The local authority for the relevant area.

Please state the grounds as to why you come within the category selected above:

Todd Energy Limited is New Zealand's leading onshore natural gas supplier. Its natural gas operations are of national, regional and local economic and social importance.

Council Hearing (please tick relevant box)

Do you wish to be heard in support of your further submission? Yes X No
If others make a similar submission would you consider presenting a joint case with them at a hearing? Yes X No

Submission

The submission points, support or opposition, reasons and decisions sought are set out in the attached document. Note: Any attachments to your submission should only be supporting information, not the submission.

Handwritten signature: pp SD

Signature of the person making further submission or the person authorised to sign on behalf of the person making further submission

28/08/2020
Date

Name of Further Submitter Todd Energy Limited

My specific further submission(s) are as follows:
 (Please only insert one further submission point per line. Add further sheets as required)

I support/oppose the submission of:	The particular part of the submission I support/oppose are:			The reasons for my support / opposition are:	I seek that the whole (or part) of the submission be allowed / disallowed:
	Sub No. / Point No.	Support / Oppose	Provision		
PDDP INTERPRETATION SECTION					
John and Mary Hamblyn	581.2	Support	The Definitions Nesting Table Section, and specifically 'primary production' and 'rural industry' aspects.	This is an efficient method for defining and arranging land use activities.	Retain definition nesting tables, noting that final terms within the nesting tables may be modified as a result of submissions, specifically the 'primary production' and 'rural industry' definitions.
The Oil Companies (Z Energy, Mobil Oil New Zealand, BP Oil New Zealand) - Matthew Thode (4Sight Consulting)	551.1	Support	Ancillary Activity definition	The definition, as worded, aligns with the RMA and National Planning Standards	Allow in full
The Royal Forest and Bird Protection Society of New Zealand Incorporated - Tom Kay, Regional Manager	487.6a	Support	Biodiversity Offset definition	The proposed amendment allows for a broader approach for the application of Biodiversity Offsets, if applicable/required.	Allow in full

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Greymouth Petroleum Limited - Tanya Hansen	548.2	Support	Construction Work definition	There are construction elements associated with Petroleum Exploration that are identical to many other Construction Works in the District. These elements of Petroleum Exploration should be included within the Construction Works definition.	Allow in part, subject to further defining elements of Petroleum Exploration that are Construction Work, such as earthworks and the mobilisation and demobilisation of equipment to/from a site.
Todd Generation Limited – Stephen Quinn	521.2	Support	Energy Activities definition	The proposed Plan wording is too narrow and should include non-renewable electricity generation.	Allow in full.
Kāinga Ora - Homes and Communities - Dr Claire Kirman	563.41	Support	Gas Transmission Pipeline definition	As worded, the proposed definition correctly outlines gas transmission pipelines.	Allow in full.
Federated Farmers Taranaki - Mark Hooper, Provincial President	564.34	Support	Hazardous Substance definition	As worded, this definition aligns with the RMA and National Planning Standards definitions.	Allow in full
KiwiRail Holdings Limited - Pam Butler	514.4	Support	Infrastructure definition	As worded, this definition aligns with the National Planning Standards definition and includes natural gas pipelines and network utility operations.	Allow in full

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Todd Generation Limited - Stephen Quinn	521.7	Support	Major Facilities definition	The McKee and Junction Rd Power Plants should be included as Major Facilities as they are nationally and regionally significant and contribute to the economic and social wellbeing of the community.	Allow in full
KiwiRail Holdings Limited - Pam Butler	514.5	Support	Network Utilities or Network Utility definition	As worded, this definition aligns with the National Planning Standards definition.	Allow in full.
The Oil Companies (Z Energy, Mobil Oil New Zealand, BP Oil New Zealand) - Matthew Thode (4Sight Consulting)	551.7	Support	Network Utility Operator definition	As worded, this definition aligns with the National Planning Standards definition	Allow in full.
Todd Generation – Stephen Quinn	521.5	Support	Non-Renewable Electricity Generation Activities	This definition generally provides a good description for non-renewable generation activities, noting that the submitter is not aware of any commercial electricity generation that relies on oil as a fuel.	Allow in part. Delete oil as an energy source from which non-renewable electricity comes from.
OMV New Zealand Limited Cam Twigley (BTW Company Limited)	573.4	Support	Oil and Gas Activity definition	As worded, this definition is helpful for the interpretation of policy ENGY-P9.	Allow in full.

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Taranaki Energy Watch Incorporated - Sarah Roberts	543.6	Support	Peak Particle Velocity (PPV) Testing definition	This definition, as worded, correctly defines the purpose of PPV testing	Allow in full.
Petroleum Exploration and Production Association of NZ Inc - Joshua O'Rourke	539.16	Support	Petroleum Exploration definition	The term 'mineral' can be confusing when describing a petroleum related activity. Noting that some elements of this proposed definition may also be irrelevant and should be deleted.	Allow in part. Noting that some elements of the proposed definition may be irrelevant and should be deleted, specifically, reference to 'dredging' and the 'use of explosives'.
Omata Tank Farm Operators - Cam Twigley (BTW Company Limited)	466.1	Support	Petroleum Production definition	The storage of petroleum products is an important part of the petroleum production process. The proposed amendments should be included within this definition.	Allow in full.
The Royal Forest and Bird Protection Society of New Zealand Incorporated - Tom Kay, Regional Manager	487.19	Oppose	Petroleum Production definition	Extraction and production are inherently interrelated for petroleum activities i.e. the production equipment extracts and processes petroleum resources. The term extraction should remain within this definition.	Disallow in full.

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OMV New Zealand Limited Cam Twigley (BTW Company Limited)	573.7	Support	Petroleum Prospecting definition	The term 'e.g.' is more appropriate as seismic surveys are not the only survey method.	Allow in full.
Aggregate & Quarry Association of New Zealand ("AQA") - Graeme Mathieson	477.5	Support	Primary Production definition	As worded, this definition aligns with the RMA definition of primary production.	Allow in full.
Horticulture New Zealand - Jordyn Landers	457.7	Support	Reverse Sensitivity definition	As worded, this definition recognises the potential for impacts on existing lawfully established activities from new activities establishing in the vicinity.	Allow in full.
Federated Farmers Taranaki - Mark Hooper, Provincial President	564.45	Support	Rural Activity definition	As proposed, the definition broadly covers all applicable rural activities. Noting that Todd has submitted on broadening the definition of Mining, which is an accepted element of Primary Production.	Allow in full.

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Tegal Foods Limited – John Russell	467.80	Support	Rural Character definition	Support the inclusion of the word 'primary' as this provides clarity and certainty as to what the term production means in a rural character sense. "..... open space between buildings, <i>primary</i> production.... "	Allow in part. ".....open space between buildings, <i>primary</i> production "
Federated Farmers Taranaki - Mark Hooper, Provincial President	564.51	Support	Rural Industry definition	As worded, this definition aligns with the National Planning Standards definition	Allow in full.
The Royal Forest and Bird Protection Society of New Zealand Incorporated - Tom Kay, Regional Manager	487.12	Oppose	Rural or Rural Land definition	As worded, this definition refers to 'rural' or 'rural land'. The term 'rural' implies associated rural activities so the definition as proposed should stand.	Disallow in full.
Federated Farmers Taranaki - Mark Hooper, Provincial President	564.62	Support	Rural Transport Activities definition	The definition as proposed, provides certainty and clarity around rural transport activities.	Allow in full.

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Todd Generation – Stephen Quinn	521.6	Support	Significant Hazardous Facilities definition	As proposed, the amendments align with other overlapping legislation, namely the Health and Safety at Work (Major Hazardous Facilities) Regulations 2016.	Allow in full.
The Oil Companies (Z Energy, Mobil Oil New Zealand, BP Oil New Zealand) - Matthew Thode (4Sight Consulting)	551.27	Support	Significant Hazardous Facilities definition	The District Plan should only control hazardous substances where the potential effects are not covered by HSNO or HSWA. For certainty and clarity, it should be stated that the definition does not apply to the distribution or transmission by pipeline or road tanker of petroleum products.	Allow in full Include: " <i>.....distribution or transmission by pipeline or road tanker of petroleum products</i> ".
The Oil Companies (Z Energy, Mobil Oil New Zealand, BP Oil New Zealand) – Matthew Thode (4Sight Consulting)	551.9	Support	Structure definition	As worded, this definition aligns with the National Planning Standards definition.	Allow in full.
Greymouth Petroleum Limited – Tanya Hansen	548.18	Support	Vehicle Movement definition	As worded, this definition provides clarity and certainty for interpreting vehicle trip generation rules.	Allow in full.
Taranaki Energy Watch Incorporated - Sarah Roberts	543.26	Oppose	New Petroleum Activity Risk Contour definition	This term is not relevant to the objectives and policies within the notified HAZS section of this proposed Plan.	Disallow in full.

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Taranaki Energy Watch Incorporated - Sarah Roberts	543.18	Oppose	New Unacceptable Risk definition	The term unacceptable risk should be revisited and clarified as it does not align with current international good practise in contemporary risk planning and management guidance documents.	Disallow in full.
PNPDP ENERGY SECTION					
Heritage New Zealand Pouhere Taonga - Caroline Rachlin	522.24	Oppose	ENGY Chapter	Cultural and heritage values are supported throughout the proposed plan, specifically within the Historic and Cultural Values Sections of the proposed plan.	Disallow in full.
Petroleum Exploration and Production Association of NZ Inc - Joshua O'Rourke	539.21	Support	ENGY Overview	Natural gas production in the New Plymouth District provides for New Zealand's energy needs including the generation of key export products such as methanol and fertilizers.	Allow in full
Te Kotahitanga o Te Atiawa Trust - Hemi Sundgren	459.59	Support	ENGY-O1 & O2	ENGY O1&O2 and UFD 20 are complementary. UFD 20 is a subset of ENGY O1&O2 The current objectives do not conflict with UFD-20. However, a new objective focussing on renewable energy and linking to ENGY-P12-18 could be appropriate	Allow in part

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Todd Generation – Stephen Quinn	521.14	Support	ENGY-O1	As worded, this enabling objective recognises the significant benefits energy activities bring to the District.	Allow in full
Todd Generation – Stephen Quinn	521.15	Support	ENGY-O2	As worded, this objective recognises locational constraints for energy activities while ensuring any impacts are minimised.	Allow in full
Trustpower Limited - Shelby Managh	544.34	Support	ENGY-O NEW	To further align with UFD-20 an additional objective that recognises the benefits of renewable energy to the district is appropriate. The objective should focus on the 'New Plymouth District', not just New Plymouth.	Allow in part
Climate Justice Taranaki Incorporated - Catherine Cheung	311.34	Oppose	ENGY-O NEW	The current proposed objectives and the inclusion of an additional objective focusing on renewable energy covers these matters.	Disallow in full
Hiringa Energy Limited - Cam Twigley (BTW Company Limited)	558.18	Oppose	ENGY-O-NEW	It is not appropriate to have aspirational objectives in the proposed plan without direct policy linkages. An additional new objective focussing on renewable energy covers these matters.	Disallow in full

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Department of Conservation - Nardia Yozin	550.45-50	Oppose	ENGY-P-NEW	There are specific policies protecting these identified features under other Sections of the proposed Plan. There are also elements of petroleum prospecting that have temporary and de minimus impacts only, e.g. surveying and placing nodes.	Disallow in full
New Plymouth District Council - Juliet Johnson	582.3	Oppose	ENGY-P1	The use of explosives is only one part of a seismic survey. Many other elements of the survey have temporary and de minimus impacts. These elements should not be constrained through policies and rules.	Disallow in full.
New Plymouth District Council - Juliet Johnson	582.4 & 582.7	Oppose	ENGY-P2	This policy, as proposed in 2 different versions, could create perverse outcomes, i.e. a consent process for elements of a seismic survey in other zones that have temporary and de minimus impacts. Only the elements with potential impacts i.e. the use of explosives, should be managed.	Disallow in full
OMV New Zealand Limited Cam Twigley (BTW Company Limited)	573.19	Support	ENGY-P3	As worded, this policy enables appropriate zone-specific activities to occur, giving clarity and certainty to plan users.	Allow in full

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OMV New Zealand Limited Cam Twigley (BTW Company Limited)	573.25	Support	ENGY-P4	This policy should give recognition to the locational constraints for petroleum exploration and production activities in terms of resources, technical extraction constraints and any existing sensitive land uses and features.	Allow in full
Te Kotahitanga o Te Atiawa Trust - Hemi Sundgren	459.45	Support	ENGY-P5 & ENGY-P6	These policies, as worded, provide clarity and certainty for Plan users. For clarity, this further submission does not support proposed amendments to ENGY-P5, as outlined in 459.44.	Allow in full
OMV New Zealand Limited Cam Twigley (BTW Company Limited)	573.11	Support	ENGY-P8	This policy, as worded, provides clarity and certainty for plan users.	Allow in full
OMV New Zealand Limited Cam Twigley (BTW Company Limited)	573.12	Support	ENGY-P9	The proposed amendments provide for a more certain and fairer outcome for operators.	Allow in full

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Taranaki Energy Watch Incorporated - Sarah Roberts	543.16	Oppose	ENGY-P10	Central Government is currently assessing financial assurance provisions. Requiring Councils to hold a bond would be inefficient and could duplicate proposed Central Government legislation	Disallow in full
Greymouth Petroleum Limited - Tanya Hansen	548.34	Oppose	ENGY-P10	It is not the role of the District Plan policies to compel consultation with landowners and regulatory agencies.	Disallow in full
New Plymouth District Council - Juliet Johnson	582.5	Oppose	ENGY-R1	The wording, as proposed, may create perverse outcomes where temporary and de minimus aspects of a seismic survey, such as surveying and laying of nodes, are captured by the proposed plan as RDIS activities.	Disallow in full.
OMV New Zealand Limited Cam Twigley (BTW Company Limited)	573.24 & 573.26	Support	ENGY-R3 & ENGY-R4	The rules as proposed give Plan users some certainty while managing any potential effects.	Allow in full
OMV New Zealand Limited Cam Twigley (BTW Company Limited)	573.20	Support	ENGY-S5	The standards as proposed give certainty to Plan users and manage any potential impacts from the use of explosives.	Allow in full

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PNPDP NETWORK UTILITIES SECTION					
First Gas Limited - Zane Wood	309.9c	Support	NU - O3	This objective, as worded, gives appropriate recognition to the essential function and nature of Network Utilities.	Allow in full
OMV New Zealand Limited Cam Twigley (BTW Company Limited)	573.35	Support	NU-P1	This policy, as worded, recognises the critical role that Network Utilities have in maintaining and enhancing local and national social and economic wellbeing.	Allow in full
OMV New Zealand Limited Cam Twigley (BTW Company Limited)	573.40	Support	NU-P2	This policy, as worded, recognises the critical role that Network Utilities have in maintaining and enhancing local and national social and economic wellbeing.	Allow in full
OMV New Zealand Limited Cam Twigley (BTW Company Limited)	573.33	Support	NU-P3	This policy, as worded, recognises the critical function of Network Utilities and the efficiencies and effects benefits that new technologies may have.	Allow in full
Chorus New Zealand Limited - Andrew Kantor and Tom Anderson	547.36	Support	NU-P4	The proposed deletion and replacement, manages impacts while providing more certainty for Network Utility Operators.	Allow in full

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Chorus New Zealand Limited - Andrew Kantor and Tom Anderson	547.37	Support	NU-P5	This proposed deletion and replacement, manages impacts while providing more certainty for Network Utility Operators.	Allow in full
OMV New Zealand Limited Cam Twigley (BTW Company Limited)	573.30	Support	NU-P7	As worded, this policy affords the appropriate protection to gas transmission pipelines.	Allow in full
OMV New Zealand Limited Cam Twigley (BTW Company Limited)	573.29	Support	NU-P8	As worded, this policy affords the appropriate protection to gas transmission pipelines.	Allow in full
Chorus New Zealand Limited - Andrew Kantor and Tom Anderson	547.40	Support	NU-NEW	The proposed policy recognises the critical nature of Network Utilities and the locational constraints of such infrastructure. Engineering solutions can protect assets and manage impacts.	Allow in full
Chorus New Zealand Limited - Andrew Kantor and Tom Anderson	547.42	Support	NU-R1	The rule, as worded, facilitates the safe and efficient management of essential underground services such as gas transmission pipelines.	Allow in full
OMV New Zealand Limited Cam	573.28	Support	NU-R2	Not having optionality within this rule does not facilitate sustainable	Allow in part.

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Twigley (BTW Company Limited)				management outcomes. In some circumstances, there could be strong landowner preference for infrastructure to be abandoned in situ. This would also lead to better environmental outcomes in many cases. Access Agreements with landowners may require in situ abandonment. The proposed rule would require a land use consent for such pipelines. Is this an efficient outcome? It may also duplicate TRC roles and functions.	The timeframe should be deleted and replaced with " <i>... or abandoned in situ if this provides better environmental outcomes.</i> "
Kāinga Ora - Homes and Communities - Dr Claire Kirman	563.205	Support	NU-R4	As worded, this rule provides for the efficient installation, repair, maintenance and upgrading of network utilities.	Allow in full.
Powerco Limited - Cheryl Cleary	568.49	Support	NU-R6	The proposed amendment will improve the clarity and certainty of this rule.	Allow in full.
Powerco Limited - Cheryl Cleary	568.50(b)	Support	NU-R8	As worded, this proposed rule provides for ancillary gas transmissions and distribution structures.	Allow in full.
Kāinga Ora - Homes and Communities - Dr Claire Kirman	563.191	Support	NU-R10	As worded, the proposed rule gives recognition to existing Network Utility buildings.	Allow in full.

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Kāinga Ora - Homes and Communities - Dr Claire Kirman	563.192	Support	NU-R11	As worded, the proposed rule gives recognition to the requirements for environmental monitoring equipment.	Allow in full.
Kāinga Ora - Homes and Communities - Dr Claire Kirman	563.195	Support	NU-R18	This proposed rule, as worded, provides clarity and certainty for Network Utility Operators.	Allow in full
OMV New Zealand Limited Cam Twigley (BTW Company Limited)	573.27	Support	NU-R19	<p>This rule, as worded, does not facilitate sustainable management outcomes. In some circumstances there could be strong landowner preference for infrastructure to be abandoned in situ. This would also lead to better environmental outcomes in many cases. Access Agreements with landowners may require in situ abandonment. This would require a land use consent for such pipelines to remain in situ. Is this an efficient outcome?</p> <p>It may also duplicate TRC roles and functions.</p>	<p>Allow in part.</p> <p>The timeframe should be deleted and replaced with "<i>... or abandoned in situ if <u>this provides better environmental outcomes.</u></i>"</p>

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First Gas Limited - Zane Wood	309.11	Support	NU-R39	The proposed amendments provide more clarity and certainty for operators and landowners. The proposed revision better acknowledges and manages potential risks leading to better environmental outcomes.	Allow in full.
First Gas Limited - Zane Wood	309.12	Support	NU-R40	The proposed amendments provide more clarity and certainty for operators and landowners. The proposed revision better acknowledges and manages potential risks leading to better environmental outcomes.	Allow in full
First Gas Limited - Zane Wood	309.13	Support	NU-R41	The proposed amendments provide more clarity and certainty for operators and landowners. The proposed revision better acknowledges and manages potential risks leading to better environmental outcomes.	Allow in full
PNPDP TRANSPORT SECTION					
Federated Farmers Taranaki - Mark Hooper, Provincial President	564.93	Support	TRANS-O2	This objective, as worded, gives recognition to the importance of an effective road transport network for maintaining and enhancing district and national social and economic benefits.	Allow in full

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John and Mary Hamblyn - Jeremy Brophy (BTW Company Limited)	581.22	Support	TRANS-O3	This objective, as worded, is too directive and should focus on avoiding, remedying or mitigating potential adverse effects, as opposed to being activity focussed.	Allow in full
Kāinga Ora - Homes and Communities - Dr Claire Kirman	563.224	Support	TRANS-P1	This policy, as worded, provides for safe and efficient transport outcomes.	Allow in full
The Oil Companies (Z Energy, Mobil Oil New Zealand, BP Oil New Zealand) - Matthew Thode (4Sight Consulting)	551.45	Support	TRANS-P2	This policy, as amended, provides more clarity and certainty for plan users.	Allow in full
The Oil Companies (Z Energy, Mobil Oil New Zealand, BP Oil New Zealand) - Matthew Thode (4Sight Consulting)	551.44	Support	TRANS-P3	This policy, as worded, provides for safe and efficient transport outcomes.	Allow in full
Tegel Foods Limited - John Russell	467.10	Support	TRANS-P6	This policy, as worded, is too prescriptive. The TIA requirement should be specified through the consent application process.	Allow in full

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Papa Rererangi Puketapu Limited (NP Airport) - Richard Buttimore	504.59	Support	TRANS-P10	The policy, as worded provides recognition of the social and economic benefits of enabling an efficient road transport network.	Allow in full
Papa Rererangi Puketapu Limited (NP Airport) - Richard Buttimore	504.56	Support	TRANS-P13	This policy, as worded, provides recognition of the social and economic benefits from enabling a safe and efficient road transport network.	Allow in full
Kāinga Ora - Homes and Communities - Dr Claire Kirman	563.247	Support	TRANS-P14	This policy, as worded, provides recognition of the social and economic benefits of enabling a safe and efficient road transport network.	Allow in full
Greymouth Petroleum Limited - Tanya Hansen	548.60	Support	TRANS-P17	This policy, as worded, is very directive. It should recognise the locational constraints and temporary nature of some activities, while ensuring any effects are avoided, remedied or mitigated.	Allow in full
Tegel Foods Limited - John Russell	467.12	Support	TRANS-P18	This policy, as worded, is too prescriptive. The TIA requirement should be specified through the consent application process.	Allow in full

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Te Kotahitanga o Te Atiawa Trust - Hemi Sundgren	459.112 (a)	Support	TRANS-R1	The rule, as worded, gives clarity to plan users and protects the safety and efficiency of the road transport network	Allow in full
Papa Rererangi Puketapu Limited (NP Airport) - Richard Buttimore	504.79(d)	Support	TRANS-R4	The rule as worded allows for the efficient maintenance and repair construction of the transport network.	Allow in full
Marsden Machinery Limited - Jeremy Brophy (BTW Company Limited)	577.12	Support	TRANS-R5	The proposed amendments would give clarity to Plan users and would avoid unforeseen outcomes.	Allow in full
PNPDP CONTAMINATED LAND SECTION					
Climate Justice Taranaki Incorporated - Catherine Cheung	311.71	Oppose	CL-CHAPTER	The CL chapter, as worded in the District Plan, provides for the protection of human health and complements the specific requirements of the NESCS.	Disallow in full
Kāinga Ora - Homes and Communities - Dr Claire Kirman	563.301	Support	CL-CHAPTER	The CL chapter, as worded in the District Plan, provides for the protection of human health and complements the specific requirements of the NESCS.	Allow in full

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PNPDP NATURAL HAZARDS SECTION					
New Plymouth District Council - Juliet Johnson	582.17	Support	NH-OVERVIEW	The amended wording better reflects the intent of the District Plan.	Allow in full
The Oil Companies (Z Energy, Mobil Oil New Zealand, BP Oil New Zealand) - Matthew Thode (4Sight Consulting)	551.96	Support	NH-P2	This proposed amendment provides clarity and certainty for Plan users.	Allow in full
Department of Conservation - Nardia Yozin	550.56	Support	NH-P4	This policy, as worded, provides clarity and certainty for Plan users.	Allow in full
The Oil Companies (Z Energy, Mobil Oil New Zealand, BP Oil New Zealand) - Matthew Thode (4Sight Consulting)	551.94	Support	NH-P5	This proposed amendment provides clarity for Plan users. It is uncertain what the adaptive pathway planning approach is.	Allow in full
Transpower New Zealand Limited - Carolyn Wratt (Wratt Resource	565.83b	Support	NH-PNEW	This proposed new policy gives recognition to the essential nature of network utilities, the locational constraints and requirements of this infrastructure and the ability to avoid, remedy or	Allow in full

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Management Planning Limited)				mitigate risks through engineering solutions.	
PNPDP COASTAL ENVIRONMENT SECTION					
Taranaki Regional Council - Fred McLay	549.20	Support	CE-P5	This policy, as worded, is too restrictive and goes beyond the requirements of the NZCPS	Allow in full
The Oil Companies (Z Energy, Mobil Oil New Zealand, BP Oil New Zealand) - Matthew Thode (4Sight Consulting)	551.133	Support	CE-P8	This policy, as worded, is too absolute and may lead to perverse outcomes. There are locational constraints for some key industries that currently exist within the CE.	Allow in full
Greymouth Petroleum Limited - Tanya Hansen	548.75	Support	CE-R16	N/C activity status is too restrictive. A full discretionary activity status would be more appropriate given the potential effects are temporary only, are well understood, and can be avoided, remedied or mitigated.	Allow in full
OMV New Zealand Limited Cam Twigley (BTW Company Limited)	573.65	Support	CE-R17	N/C activity status is too restrictive. A full discretionary activity status would be more appropriate given the potential effects are temporary only, are well understood, and can be avoided, remedied or mitigated.	Allow in full

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PNPDP EARTHWORKS SECTION					
Greymouth Petroleum Limited - Tanya Hansen	548.79	Support	EW-P7	The policy, as worded is too restrictive and directive. Is it relevant that this EW policy is managing potential impacts from structures? The mitigation mentioned in the proposed policy should be 'or'. I.e. encourage earthworks to reflect natural landforms or encourage landscaping to minimise visual impacts.	Allow in part The mitigation mentioned in the proposed policy should be 'or'. I.e. encourage earthworks to reflect natural landforms or encourage landscaping to minimise visual impacts.
Two Degrees Networks Limited - Ben Blakemore and Tom Anderson	569.87	Support	EW-R9	The rule, as worded, is too restrictive, is more onerous than TRC earthworks management requirements and would lead to duplication of regulatory functions.	Allow in full.
Vaughan Maclean	337.7	Support	EW-R12	The permitted volume is too restrictive, significantly more so than the TRC regulations for earthworks, and would lead to significant regulatory duplication.	Allow in full
Greymouth Petroleum Limited - Tanya Hansen	548.80	Support	EW-S2	The standard as worded is too restrictive and would lead to regulatory duplication.	Allow in full
First Gas Limited - Zane Wood	309.16	Support	EW-R NEW	The proposed new rule would provide better protection for underground pipelines and would provide more certainty for Plan users.	Allow in full

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PNPDP LIGHT SECTION					
The Oil Companies (Z Energy, Mobil Oil New Zealand, BP Oil New Zealand) - Matthew Thode (4Sight Consulting)	551.153	Support	LIGHT-S1	This standard, as worded, manages potential impacts and provides certainty for Plan users.	Allow in full
PNPDP MAJOR FACILITY ZONE SECTION					
Climate Justice Taranaki Incorporated - Catherine Cheung	311.95	Oppose	MFZ-Overview	All Major Facilities provide significant social and economic benefits to the district and nation. The regions natural gas industry employs 7000 people and contributes 30% to Regional GDP.	Disallow in full
Todd Generation Limited - Stephen Quinn	521.34	Support	MFZ-OBJECTIVES	All the objectives, as currently worded, recognise the importance of Major Facilities to the district. The current wording should not be amended.	Allow in full
Todd Generation Limited - Stephen Quinn	521.33	Support	MFZ-POLICIES	All the policies, as currently worded, recognise the importance of Major Facilities to the district. The current wording should not be amended.	Allow in full

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Todd Generation Limited - Stephen Quinn	521.39	Support	MFZ-RULES	All the rules, as currently worded, support the primary and ancillary activities and avoid non-compatible activities. The current wording should not be amended.	Allow in full
New Plymouth District Council - Juliet Johnson	582.69	Support	PREC6	The proposed amendments better reflect the primary and ancillary activities and will better serve the future management of these activities.	Allow in full
PNPDP RURAL LIFESTYLE ZONE SECTION					
Greymouth Petroleum Limited - Tanya Hansen	548.91	Support	RLZ-P2	Many aspects of seismic surveys are temporary with minimum impacts, such as land surveying, and the placement of temporary pegs and nodes. The proposed amendments better reflect this fact.	Allow in full
Greymouth Petroleum Limited - Tanya Hansen	548.92	Support	RLZ-R16 & RLZ-NEW	<p>Many aspects of seismic surveys are temporary with minimum impacts, such as surveying, and the placement of temporary pegs and nodes. These should be able to proceed as a permitted activity.</p> <p>The proposed new rules would provide better clarity and certainty for Plan users; noting that specific Access Agreements must also be signed by all landowners under the CMA for the use of explosives.</p>	Allow in full.

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Climate Justice Taranaki Incorporated - Catherine Cheung	311.75	Oppose	RLZ-R25	A discretionary activity gives Council full remit to grant or decline an application based on the specific facts and potential impacts of that application. A prohibited activity is too onerous and may lead to perverse outcomes.	Disallow in full
First Gas Limited - Zane Wood	309.19	Support	RLZ-NEW	The proposed new rules would better manage risks to gas pipelines and provide more certainty and clarity to Plan users.	Allow in full
PNPDP NOISE SECTION					
Greymouth Petroleum Limited - Tanya Hansen	548.83	Support	NOISE-O2	The RMA does not adopt a 'no effects' approach. Instead, effects should be avoided, remedied or mitigated. The proposed amendment acknowledges this fact.	Allow in full
Todd Generation Limited - Stephen Quinn	521.57	Support	NOISE-O3	As worded this objective acknowledges the requirement to manage reverse sensitivity impacts on existing operations.	Allow in full
OMV New Zealand Limited Cam Twigley (BTW Company Limited)	573.62	Support	NOISE-P3	As worded, this policy provides for good resource management outcomes and gives clarity and certainty to Plan users.	Allow in full

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	<i>Sub No. / Point No.</i>	<i>Support / Oppose</i>	<i>Provision</i>		
Greymouth Petroleum Limited - Tanya Hansen	548.88	Support	NOISE-P4	The proposed amendment better protects existing industry from reverse sensitivity impacts. There is potential for significant reverse sensitivity impacts in the Rural Production Zone and the current policy wording does not account for this.	Allow in full
PNPDP RURAL PRODUCTION ZONE SECTION					
Todd Generation Limited - Stephen Quinn	521.55	Support	RPROZ-OVERVIEW	Energy activities are primarily located in the Rural Production Zone. Recognition should be given to this in the Overview section.	Allow in full
Climate Justice Taranaki Incorporated - Catherine Cheung	311.56	Oppose	RPROZ-O4	The objective, as worded, provides factual details of the actual character and amenity of this zone. The proposed amendments would delete facts, which is not in line with sound resource management practises.	Disallow in full
Todd Generation Limited - Stephen Quinn	521.48	Support	RPROZ-O4	There are a range of energy activities within the Rural Production zone. Recognition should be given to these within this objective.	Allow in full

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	Sub No. / Point No.	Support / Oppose	Provision		
Climate Justice Taranaki Incorporated - Catherine Cheung	311.57	Oppose	RPROZ-O5	The proposed amendment would create a confusing and contradictory objective that would not assist Plan users or create good resource management outcomes.	Disallow in full
Todd Generation Limited - Stephen Quinn	521.47	Support	RPROZ-O5	There are a range of energy activities within the Rural Production zone. Recognition should be given to this activity within objective RPROZ-O5.	Allow in full
Todd Generation Limited - Stephen Quinn	521.46	Support	RPROZ-O7	All existing lawfully established rural industries and energy activities should be afforded the same reverse sensitivity protections in the Rural Production zone.	Allow in full
Climate Justice Taranaki Incorporated - Catherine Cheung	311.58	Oppose	RPRO-P1	Petroleum prospecting has been undertaken in the District's rural zone for 5 decades with temporary and minimal impacts. These activities are rightly recognised should be recognised within this policy.	Disallow in full
Todd Generation Limited – Stephen Quinn	521.45	Support	RPRO-P2	There are a range of energy activities within the Rural Production zone. Recognition should be given to this activity within this policy	Allow in full

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Todd Generation Limited – Stephen Quinn	521.44	Support	RPRO-P3	Existing lawfully established activities in the Rural Production zone should also be afforded protection from reverse sensitivity effects. The policy should be amended, as proposed by this submitter.	Allow in full
Todd Generation Limited – Stephen Quinn	521.43	Support	RPRO-P6	There are a range of energy activities within the Rural Production zone. Recognition should be given to this activity within this policy	Allow in full
Todd Generation Limited – Stephen Quinn	521.53	Support	RPRO-P7	There are a range of energy activities and lawfully established activities within the Rural Production zone. Recognition should be given to these activities within this policy	Allow in full
Taranaki Energy Watch Incorporated - Sarah Roberts	543.24	Oppose	RPROZ-RULES	Support is given to the RPROZ rules as drafted. These consequential amendments that are proposed do not provide clarity and certainty for Plan users or facilitate good resource management outcomes.	Disallow in full
PNPDP HAZARDOUS SUBSTANCES SECTION					
Taranaki Energy Watch Incorporated - Sarah Roberts	543.15	Oppose	HAZS - Seismic Surveys	Subject to the amendments supported by Todd, the seismic survey provisions and management structure as proposed in this District Plan are supported.	Disallow in full

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				There is specific legislation that covers the storage and use of charges, namely the Health and Safety at Work (Hazardous Substances) Regulations 2017	
Taranaki Energy Watch Incorporated - Sarah Roberts	543.29	Oppose	HAZS Section	The interim decision stated that specific management of this potential effect was not required in the District Plan. Subject to the specific points raised below, the HAZS Section should remain as proposed.	Disallow in full
The Oil Companies (Z Energy, Mobil Oil New Zealand, BP Oil New Zealand) - Matthew Thode (4Sight Consulting)	551.70	Support	HAZS-O1	The proposed amendments recognise that not all facilities require specific management under the New South Wales Hazardous Industry Planning Advisory Papers (HIPAP) series.	Allow in full
Taranaki Energy Watch Incorporated - Sarah Roberts	543.20	Oppose	HAZS-O2	The proposed amendment creates confusion and detracts from the current purpose of HAZS-O2.	Disallow in full
The Oil Companies (Z Energy, Mobil Oil New Zealand, BP Oil New Zealand) - Matthew Thode (4Sight Consulting)	551.68	Support	HAZS-O2	The proposed amendment acknowledges the potential for risk associated with reverse sensitivity impacts.	Allow in full

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Federated Farmers Taranaki - Mark Hooper, Provincial President	564.131	Support	HAZS-O3	The proposed amendment recognises the potential for existing situations to exist. HIPAP provides guidance on the management of this scenario, if it occurs within this District.	Allow in full
The Oil Companies (Z Energy, Mobil Oil New Zealand, BP Oil New Zealand) - Matthew Thode (4Sight Consulting)	551.75	Support	HAZS-P1	Risk contours are an arbitrary/blunt mechanism for managing risks. There are other methods for risk management. The limitations of risk contours are discussed in HIPAP	Allow in full
The Oil Companies (Z Energy, Mobil Oil New Zealand, BP Oil New Zealand) - Matthew Thode (4Sight Consulting)	551.72	Support	HAZS-P4	It is not the purpose of the RMA, or the HIPAP series to promote the internalisation of potential impacts. Noting that existing hazardous facilities are lawfully established and have an existing use right.	Allow in full
The Oil Companies (Z Energy, Mobil Oil New Zealand, BP Oil New Zealand) - Matthew Thode (4Sight Consulting)	551.74	Support	HAZS-P6	Existing hazardous facilities are lawfully established and the HAZS-P6 provisions should only apply to new hazardous facilities.	Allow in full

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The Oil Companies (Z Energy, Mobil Oil New Zealand, BP Oil New Zealand) - Matthew Thode (4Sight Consulting)	551.79	Support	HAZS-P7	The proposed amendments would give relevance to this policy for the life of the District Plan. This amendment correctly notes that areas, and not contours, are represented in the Plan.	Allow in full
The Oil Companies (Z Energy, Mobil Oil New Zealand, BP Oil New Zealand) - Matthew Thode (4Sight Consulting)	551.76	Support	HAZS-P8	The proposed amendment avoids duplication within the Plan sections and recognises the existing use rights of established facilities.	Allow in full
Taranaki Energy Watch Incorporated - Sarah Roberts	543.22	Oppose	HAZS-NEW	Many of these matters are duplicated through the existing proposed objectives and policies. The STDP process focussed on a very arbitrary trigger to manage risk. There are limitations to this, and it can create perverse outcomes for operators and landowners. There are unique situations to each District and potential new evidence to consider on this matter. The NPDP process should not be compelled to follow STDP outcomes.	Disallow in full

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The Oil Companies (Z Energy, Mobil Oil New Zealand, BP Oil New Zealand) - Matthew Thode (4Sight Consulting)	551.87	Support	HAZS-R1	The need for consent for any repair and maintenance is onerous and may stymie the intent of other specific legislation requiring repair and maintenance activities to manage risk.	Allow in full
OMV New Zealand Limited Cam Twigley (BTW Company Limited)	573.48	Support	HAZS-R2	The proposed amendments avoid contradiction and confusion with this rule and MFZ rules.	Allow in full
The Oil Companies (Z Energy, Mobil Oil New Zealand, BP Oil New Zealand) - Matthew Thode (4Sight Consulting)	551.84	Support	HAZS-R4	The rule, as amended provides certainty for Plan users and acknowledges the existing use rights of existing lawfully established hazardous facilities.	Allow in full
The Oil Companies (Z Energy, Mobil Oil New Zealand, BP Oil New Zealand) - Matthew Thode (4Sight Consulting)	551.83	Support	HAZS-R5	The rule, as amended provides certainty for Plan users and acknowledges the existing use rights of existing lawfully established hazardous facilities.	Allow in full
The Oil Companies (Z Energy, Mobil Oil New Zealand, BP	551.80	Support	HAZS-R6	The rule, as amended provides certainty for Plan users and acknowledges the	Allow in full

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Oil New Zealand) - Matthew Thode (4Sight Consulting)				existing use rights of existing lawfully established hazardous facilities.	
The Oil Companies (Z Energy, Mobil Oil New Zealand, BP Oil New Zealand) - Matthew Thode (4Sight Consulting)	551.82	Support	HAZS-R7	The rule, as amended provides certainty for Plan users and acknowledges the existing use rights of existing lawfully established hazardous facilities.	Allow in full
The Oil Companies (Z Energy, Mobil Oil New Zealand, BP Oil New Zealand) - Matthew Thode (4Sight Consulting)	551.81	Support	HAZS-R8	The rule, as amended provides certainty for Plan users and acknowledges the existing use rights of existing lawfully established hazardous facilities.	Allow in full
OMV New Zealand Limited Cam Twigley (BTW Company Limited)	573.58	Support	HAZS-R8	This rule, as worded, has potential to impact the existing use rights of lawfully established facilities. This may lead to perverse resource management outcomes, i.e. an existing facility having to apply for minor upgrades as a N/C activity.	Allow in part. The amendment proposed in submission point 551.81 would resolve this issue.
The Oil Companies (Z Energy, Mobil Oil New Zealand, BP Oil New Zealand) -	551.91	Support	HAZS-R10	The rule, as amended provides certainty for Plan users and acknowledges the existing use rights of existing lawfully established hazardous facilities.	Allow in full

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Matthew Thode (4Sight Consulting)					
OMV New Zealand Limited Cam Twigley (BTW Company Limited)	573.52	Support	HAZS-R11	This rule, as worded, provides protection to existing facilities from potential reverse sensitivity impacts.	Allow in full
The Oil Companies (Z Energy, Mobil Oil New Zealand, BP Oil New Zealand) - Matthew Thode (4Sight Consulting)	551.89	Support	HAZS-R12	This rule, as worded, provides protection to existing facilities from potential reverse sensitivity impacts.	Allow in full
Taranaki Energy Watch Incorporated - Sarah Roberts	543.23	Oppose	HAZS-R NEW	<p>Many of these matters are duplicated through the proposed objectives, policies and rules.</p> <p>The STDP process focussed on a very arbitrary mechanism to manage risk. There are limitations to this, and it can create perverse outcomes for operators and landowners. There are unique situations to each District and potential new evidence to consider on this matter. The NPDP process should not be compelled to follow STDP outcomes.</p>	Disallow in full

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PNPDP TANGATA WHENUA SECTION					
Te Kotahitanga o Te Atiawa Trust - Hemi Sundgren	459.11	Support	TW Chapter	Todd recognises the important role of Tangata Whenua in providing cultural expertise to inform developments or decisions which have the potential to affect identified cultural values. Not every development or decision that occurs under this Plan will affect identified cultural values.	Allow in part
PNDP HISTORIC AND CULTURAL SECTION					
Kāinga Ora - Homes and Communities - Dr Claire Kirman	563.14	Support	HC-1	Todd supports the submission's suggested wording as clarifies the type of activities or effects the Plan is trying to protect the identified values from.	Allow in full
Kāinga Ora - Homes and Communities - Dr Claire Kirman	563.15	Support	HC-2	Todd supports the submission's suggested wording as it clarifies the level of protection needed.	Allow in full

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Heritage New Zealand Pouhere Taonga	522.18c	Support	HC-3	Todd supports the submission seeking to retain the objective as notified as it provides for matters of national importance.	Allow in full
PNDP NATURAL ENVIRONMENT SECTION					
Climate Justice Taranaki Incorporated	311.24	Oppose	NE Strategic Objectives	The Strategic Objectives as notified appropriately address the priority issues that are within the scope of the Plan. Measures to specifically mitigate climate change are more effectively addressed through other mechanisms.	Disallow in full
Ngati Rahiri Hapu o Te Aiawa (Taranaki) Society Inc	503.5	Support	NE Strategic Objectives	Todd supports that the Natural Environment Strategic Objectives be retained as notified because they provide guidance and clarity for plan users.	Allow in full

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PNDP STRATEGIC DIRCTION – TANGATA WHENUA SECTION					
Climate Justice Taranaki Incorporated	311.25	Oppose	TW 8-12	The Strategic Objectives as notified appropriately address the priority issues that are within the scope of the Plan. Measures to specifically mitigate climate change are more effectively addressed through other mechanisms.	Disallow in full
Ngati Rahiri Hapu o Te Aiawa (Taranaki) Society Inc	503.6	Support	TW 8-12	Todd supports the submission that Tangata Whenua Strategic Objectives be retained as notified because they provide guidance and clarity for plan users.	Allow in full
PNDP STRATEGIC DIRCTION – URBAN FORM AND DEVELOPMENT SECTION					
Todd Generation Limited	521.7	Support	UFD-13	Todd supports the submission to recognise the positive contributions that energy activities can make beyond the district.	Allow in full
Todd Generation Limited	521.9	Support	UFD-21	The contribution of energy activities to the economic and social well-being of the district should be specifically recognised within the context of the strategic direction for the district.	Allow in full

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	<i>Sub No. / Point No.</i>	<i>Support / Oppose</i>	<i>Provision</i>		
Petroleum Exploration and Production Association of NZ Inc	539.26	Support	UFD-23	Todd supports the submission seeking clarity that Petroleum Activities are considered Rural Activities as they are an accepted element of the rural environment in the New Plymouth District.	Allow in full
Transpower New Zealand Limited	565.42	Support	UFD-24	Todd supports the submission seeking to avoid use of the term 'protect' because it implies the land cannot be used and to recognise that some activities, such as infrastructure, are best placed in a rural location.	Allow in full
Chorus New Zealand Limited	547.22	Support	UFD-NEW	Todd supports the addition of a further strategic objective to recognise and provide for infrastructure.	Allow in full
PNDP HISTORIC AND CULTURAL VALUES SECTION					
Chorus New Zealand Limited	547.68	Support	HH Overview	It should be clarified in the Historic Heritage Overview (3) Archaeological Sites why +/- 200m is appropriate for archaeological sites which do not have a verified extent.	Allow in full

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	Sub No. / Point No.	Support / Oppose	Provision		
Waka Kotahi New Zealand Transport Agency	566.63	Support	HH-P14	This policy, as worded, provides a suitable framework for assessing and managing potential effects on historic heritage	Allow in full
Heritage Taranaki Inc	297.19	Support	HH-P15	This policy, as worded, is appropriate and reasonable and provides good clarity for Plan users.	Allow in full
Waka Kotahi New Zealand Transport Agency	566.61	Support	HH-P16	This policy provides a suitable framework for assessing and managing potential effects on historic heritage.	Allow in full
Heritage Taranaki Inc	297.17	Support	HH-P17	Todd supports the submission that the Policy is appropriate and reasonable.	Allow in full
Te Kotahitanga o Te Atiawa Trust	459.103	Oppose	HH/Rules/Archaeological Sites	It is essential that tangata whenua are a key part of any archaeological decision-making process, however it is uncertain whether a transfer of powers under s.33 RMA would lead to improved resource management outcomes for the District.	Oppose in part
Heritage New Zealand Pouhere Taonga	522.58	Support	HH-R17	Todd supports the submission that the rule appropriately manages effects on historic heritage values.	Allow in full
Heritage New Zealand Pouhere Taonga	522.73c	Support	SASM Objectives	Todd supports the submission that the proposed objectives give effect to the RMA including s.6 matters of national importance.	Allow in full

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	Sub No. / Point No.	Support / Oppose	Provision		
Waka Kotahi New Zealand Transport Agency	566.56	Support	SASM-P3	Todd supports the submission that the policy provides a suitable framework to manage potential affects.	Allow in full
Waka Kotahi New Zealand Transport Agency	566.56	Support	SASM-P4	Todd supports the submission that the policy provides a suitable framework to manage potential affects.	Allow in full
Heritage New Zealand Pouhere Taonga	522.62	Support	SASM-P5	Todd supports the submission that the policy provides an appropriate framework for associated rules.	Allow in full
Heritage New Zealand Pouhere Taonga	522.67	Support	SASM-P8	Todd supports the submission that the policy rightly focusses on mechanisms outside the Plan to facilitate Tangata Whenua access to sites.	Allow in full
Ngati Rahiri Hapu o Te Aiawa (Taranaki) Society Inc	503.2	Support	SASM R1-8	Todd supports the submission that the rules be retained as notified as they provide certainty and clarity for Plan users.	Allow in full
PNDP NATURAL ENVIRONMENTAL VALUES SECTION					
Trustpower Limited	544.73	Support	ECO-P1	Todd supports the submission that the policy provides certainty for resource users.	Allow in part

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	Sub No. / Point No.	Support / Oppose	Provision		
Powerco Limited	568.83	Support	ECO-P2	Todd supports the submission seeking recognition for regionally or nationally significant infrastructure.	Allow in full
Waka Kotahi New Zealand Transport Agency	566.67	Support	ECO-P3	Todd supports the submission's recognition of regionally significant infrastructure.	Allow in full
Transpower New Zealand Limited	565.12	Support	ECO-P4	Todd supports the submissions suggested changes to the policy.	Allow in full
Powerco Limited	568.85	Support	ECO-P5	Todd supports the submission seeking recognition of the need to provide for infrastructure construction and upgrading.	Allow in full
Powerco Limited	568.86	Support	ECO-P6	Todd supports the submission that the policies' consideration of offsets is appropriate.	Allow in full
Powerco Limited	568.87	Support	ECO-R1	<p>Todd supports the submission seeking additional recognition for the upgrade of infrastructure.</p> <p>Additional recognition should also be given to activities with temporary and less than minor impacts such as Petroleum Prospecting, where offsetting would create a net positive benefit for SNAs.</p>	<p>Allow in part</p> <p>Additional recognition should also be given to activities with temporary and less than minor impacts such as Petroleum Prospecting, where offsetting of any temporary impacts would create a net positive benefit for SNAs.</p>

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Powerco Limited	568.97	Support	WB-P2	Todd supports the submission seeking recognition of the functional and locational constraints of infrastructure.	Allow in full
Powerco Limited	568.99	Support	WB-R4	Todd supports the retention of the rule as notified as it provides certainty and clarity for Plan users.	Allow in full