

Further Submissions Form – Proposed Coastal Plan for Taranaki

Your details

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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Te Rūnanga o Ngāti Ruanui Trust	Amend Rule 26 by amending the Activity Classification to make exploration or appraisal of well drilling a Discretionary Activity (rather than a Controlled Activity)	Oppose	<p>The proposed controlled status for exploration and appraisal and conditions are appropriate.</p> <p>The nature and effects of exploration is well-understood in the region and local environments. The conditions proposed will manage the effects (which are localised) and risks in a proportionate way to the effects and short-duration and transient nature of exploration.</p>	Retain notified rule
Royal Forest and Bird Protection Society	Amend Rule 26 by amending the Activity classification to make exploration or appraisal of well drilling a Restricted Discretionary Activity (rather than a Controlled Activity).	Oppose	<p>The proposed controlled status for exploration and appraisal and conditions are appropriate.</p> <p>The nature and effects of exploration is well-understood in the region and local environments. The conditions proposed will manage the effects (which are localised) and risks in a proportionate way to the effects and short-duration and transient nature of exploration.</p>	Retain notified rule.
Greenpeace	Amend so that Rules 26 to 30 have, at minimum, a Discretionary Activity classification.	Oppose	<p>The proposed controlled status for exploration and appraisal and conditions are appropriate.</p> <p>The nature and effects of exploration is well-understood in the region and local environments. The conditions proposed will manage the effects (which are localised) and risks in a proportionate way to the effects and short-duration</p>	Retain notified rules.

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

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

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

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

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

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