

**Theme Coastal Use and Development**

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**Total number of submission points on the theme**

2953 individual submission points.

**Number of submission points supporting or agreeing with the provisions in the Proposed NZCPS**

594 submissions.

**Number of submission points opposing the provisions in the Proposed NZCPS**

99 submissions.

**Note:** some submissions comment on but do not support or oppose the provisions.

**Key messages within the submissions**

1. Supports the intent of the NZCPS to provide national guidance on what is, and what is not, appropriate subdivision, use and development within the coastal environment, providing there is continuity between local regional and national government policies.
2. Support the map of areas in Schedule IV.
3. The NZCPS does not clearly state national priorities for the preservation of the natural character of the coastal environment.
4. Use plain language and offer more definitions (e.g. what is meant by “Historic Heritage”; “inappropriate development”; “solid” in Schedule 1.3(a)(i); “mixture of land uses along the coast”). The NZCPS could result, in some areas, in a degree of modification not intended in the coastal policy. The term 'urban sprawl' has emotive connotations and should not therefore be used in a document such as the NZCPS.
5. The NZCPS must not unduly or unnecessarily restrict appropriate activities and/or development within the coastal marine area. Adequate support and provision must be provided to enable the continued operation of important infrastructure including marinas, moorings, boat ramps and other development in the coastal marine area.
6. The NZCPS will not achieve the purpose of the RMA, as it fails to sufficiently enable social and economic wellbeing and lacks the required degree of balance that the RMA seeks to ensure. The NZCPS insufficiently recognises the value of the coastal environment for many beneficial forms of use and development such as the Airport and fails to provide properly for such activities.
7. Some use and development by its very nature can not be set back from the coastal marine area and other water bodies. Further some activities have a functional need to be located on the land adjoining the coastal marine area or other water bodies.
8. There is concern that there are not enough provisions to ensure a sensitive approach to development so that the natural becomes subservient to built environment. Subdivision use and development should only take place after a national protocol protects in perpetuity features and landscapes that should never be developed.

9. Rather than being managed, some subdivision use and development should simply not occur in the coastal environment.
10. The NZCPS should identify the remaining 50 dune systems of exceptional conservation value, particularly larger transgressive dunes (in a new schedule) and direct that adverse effects arising from activities in or adjacent to these systems should be avoided.
11. If hard protection structures are deemed necessary, then exhaustive research data collection and consultation with affected communities interested parties and experts needs to be undertaken prior to the implementation of any hard protection scheme.
12. The NZCPS does not give councils the kind of direction that will enable them to withstand the onslaught of determined and well resourced developers. The Section 32 analysis states that subdivision, use and development pressures are the most significant issue for the sustainable management of the coastal environment. Policies 14 and 15 do not provide guidance because they are contradictory, and lack clarity. How acceptable development is defined in practice, its application and implementation in plans could be quite different between regions.
13. These policies are overly prescriptive and will unduly limit local decision making on preferences for subdivision and development in the coastal environment, particularly for those areas where there is already a good balance between use, development and protection of the coastal environment.
14. Local authorities should identify sites and areas within the coastal environment where subdivision or development shall not occur due to outstanding natural features or landscapes, risks relating to climate change, significant biodiversity values sites of cultural significance historic heritage or high public amenity value. Clear criteria landscape, character, features, visual qualities and amenity values are required to distinguish areas that need to be actively conserved.
15. Policy 44 is slightly confused, in that, it is the use to which the reclamation will be put, rather than the reclamation itself which is the issue.
16. Mapping areas of the New Zealand coast could be done to help ensure the preservation of areas considered to be of national importance, identify areas suitable for low-density development, and areas already compromised and therefore suitable for further development.
17. Any new coastal policy should clearly define the activities which fall into the live, work and play categories.
18. Encourage long term certainty over future land use through mechanisms such as covenants.
19. Policies for coastal areas need to be aware of the UNESCO convention on the protection of the underwater cultural heritage document and bring new plans in line with the basic standards advocated.
20. Proposed development of the Ngunguru sandspit is illogical due to the nature of the highly dynamic system of an estuarine system. Further to this, this piece of coastline is very undeveloped at present which is becoming less and less common on the Whangarei coastline.

21. Questions as to the role of a coastal policy statement in encouraging different transport choices, housing types and commercial development.
22. Policy 25 is contrary to the concept of a coastal occupation charge, which represents a payment in recognition of the exclusion of public access to the affected area of the coastal marine area. Oppose coastal occupation charging.
23. Future beach mining operations, and renewals, should be regarded as restricted coastal activities.
24. Difficult to see why the Minister of Conservation needs to be the decision maker in preference to regional councils and the Environment Court just because the structure is over 100m.
25. Policy 13 has a mechanism for planning and reporting proposed uses of the coast which are important. Critical sites for coastal birds are generally well known and can be identified now although the situation is dynamic and likely to change.
26. Strongly support the concept that activities and developments that do not require location in the coastal zone should not be there.
27. Some provisions provide more protection than the current NZCPS, through attention to cumulative and precedent effects.
28. Urban sprawl is not an issue along the entire coast. Guidance should be provided at a "national level" not as a reaction to how development is occurring in some parts of New Zealand. There should be legislation to prevent unsuitable urban sprawl and ribbon development along the coast.
29. Identification of where development will be appropriate and where it is not is already a role undertaken by territorial authorities. The policy assumes "existing urban areas" will be sustainable and suitable candidates for intensification even though some existing settlements may not be so, being in or near to sensitive ecosystems, hazard prone land, outstanding landscapes, etc. There is no recognition of new urban development in the policy. The NZCPS fails to recognise development that extends from an existing urban area, or development that changes a type of use that is more appropriate. Plain language is preferable over words like "agglomeration" and is less open to debate. It is not clear what "discouragement" is meant to achieve, but is assumed to be avoiding ribbon development along the coast that would impact on natural character. Existing Policy 3.2.1 in the current NZCPS is more sensibly and usefully worded.
30. Need some form of government support to promote in-fill development, urban rejuvenation and transport routes that discourage ribbon development. These mechanisms may not necessarily be part of the NZCPS, but should be part of integrated strategies in the areas of government supported land transport and urban planning initiatives. The NZCPS should address the surge in rural residential development along the New Zealand coastline. New development within the existing urban area should not be identified as sprawl.
31. There is nothing in the Act about an activity having to meet a test of requiring to be located in the coastal marine area before it can be consented to.
32. Blanket policies for location and form of subdivision on a nationwide basis are not appropriate as these policies governing these matters should be informed by local context and issues. Local bodies need to consult with their constituents and define what is and what is not acceptable.

33. Requiring the local authorities 'make provision' for papakainga development is insufficient. Many local bodies currently believe that their planning instruments' subdivision provisions are sufficient for papakainga development. In addition the wording may well be interpreted as forcing all development to make provision for papakainga or marae developments. Papakainga and marae developments should follow the same principles of the NZCPS as all other developments. They can still have the same adverse effects as other activities and won't be immune from causing these effects just because they are iwi developments.
34. Insert loose urban design concepts into the coastal environment through the NZCPS which set in place a generous basis for new coastal settlements.
35. Consider buffering the effects of use and development on natural character, such as the need to give space for estuarine and intertidal areas to expand and relocate as a result of sea-level rise.
36. Requiring a blanket setback of all subdivision use or development in the coastal marine area and other water bodies is unnecessary and inconsistent with sustainable management in that development does not necessarily compromise the coastal environment and is not itself inconsistent with the Act's purpose of sustainable management.
37. The zoning approach (Policy 14) could prevent use and development which may well comply with sustainable management purpose of the Act. This is a very significant issue for renewable energy development, and will lead to drawn out and highly contested plan review processes.
38. Bach settlements often have low impacts on the coastal environment. There is a need for improved regulation of coastal development to respect the size, character and location of bach settlements.
39. Inappropriately sited subdivisions can have a significant impact on adjacent water quality. Consideration should be given to the impact on existing uses of the coastal environment.
40. Provisions relate more to urban areas (and not necessarily coastal), not rural. Considered to be a costly process for Councils to assess the whole coastal environment in the District for future development and could involve a lengthy Court process also. The focus should instead be on ensuring that subdivision, use and development results in superior outcomes.
41. Council has some concerns that the notion of urban containment implicit in Policy 14 has the potential to be undermined if the coastal environment was to be purposefully defined so as not to hinder development in greenfield situations at the edge of urban areas. The use of the word 'continuous' in Policy 14 may be too open to interpretation to prevent the majority of the coast being developed.
42. Decisions on the location of growth should be undertaken by local communities and not dictated by national policy. This Policy (in general) is too directive and does not appear to provide flexibility to deliver a suitable strategic growth policy based upon local governance and decision-making.
43. Commitment to spatial planning by local authorities is supported. The desirability of coastal real estate, spiralling property values, and lack of clear plan direction and identified zones can result in ad hoc subdivision development which reduces natural

character and landscape and amenity values. Such development can compromise water quality through septic tanks and un-reticulated sewage, and poorly designed earthworks.

44. Habitats need to be provided for to ensure diversity and resilience in species ecosystems. This often requires areas of no development or intrusion.
45. There can be geographical constraints to development which means communities only have the option of spreading out along the coast. There may be other constraints such as a lack of infrastructure (e.g. roads).
46. It is considered that some of these policies are outside the mandate as set under the RMA, in terms of Section 58 of the Act and what can be covered in an NZCPS in reference to subdivision and development. The NZCPS is an inappropriate location for these types of policies/direction. The existing NZCPS Policy 3.2.1 and 1.1.1 are just as useful, especially if their wording is tightened up.
47. Policy 14(a) focuses only on subdivision and development to provide for dwellings or commercial premises. There is no compelling reason why those two particular types of activity should be singled out. The policy should recognise activities that functionally can only be located in the coastal environment, or which derive benefits from locating there, and encourage them to be enabled. Existing Policy 3.2.1 in the current NZCPS is more sensible and usefully worded.
48. The discouragement of continuous urban development may generally be appropriate, but that does not take account of the need for planning to be dynamic and to take account of ongoing growth and a need to provide for a suitable rate of development, a term used by the RMA. Urban development can be expected to have to continue to grow from time to time albeit in a properly controlled manner.
49. Within some urban areas of the coastal environment, it is more in keeping with the amenity values and character of the area to allow for development within the coastal marine area, e.g. commercial development on existing wharves.
50. Policy 14(d) should be more prescriptive and restrictive, and should mandate that wherever possible a coastal protection yard be maintained free of built structures and that the 20 metre strip back from mean high water springs should be preserved in all cases for regenerative growth of native flora and public access.
51. NZCPS provisions mean that those of us who retain ownership of our ancestral land should be able to build a house in the coastal environment but our non-Maori neighbours cannot. This is a double standard. The adverse effect that development will have on the coastal environment is the same regardless of the heritage of the developer.
52. Although the principles outlined in Policy 15 are reasonable, they are not specific to the coastal environment. They are, in effect, a summary of the Urban Design protocol, which is not a National Policy Statement, or general urban design theories. Several may be debatable.
53. The development of water-based public transport should be encouraged.
54. Fails to recognise that some areas derive their particular character and amenity from a predominance of structures, modifications or activities.

55. Particular recreational activities should be restricted. The use of vehicles, land yachts, using vehicles to launch gliders, should have some limitations placed on them so they do not compromise other values or public safety.
56. The encroachment of private property onto public land is an issue in many coastal areas where property owners have occupied esplanade reserves and strips and have limited public access along the foreshore.
57. The words "coastal marine area" do not allow for activities outside that boundary that could potentially create adverse effects. Activities such as the development of subdivisions, farming and forestry, industry and hard wall engineering construction nearby or on surf breaks.
58. Policy 25 requires a strategic approach not easily achieved under the RMA. How is a first come / first serve regime to be avoided in order to effectively implement this policy? Is it envisaged that councils could refuse resource consents on the basis that future multiple use is required?
59. Commercial interests need to be protected to support the local and national economy. There is privately owned land in the coastal marine area, and it would not be appropriate to require these structures to be made available for public or multiple use in those areas.
60. Artificial (multi-purpose) reefs should not be lumped into the hard protection structure category with seawalls, rock revetments, groynes, retaining walls, etc.
61. Proliferation of 'private' wharves and structures can often result in adverse effects on historic heritage values, such as damage to archaeological sites. For example many of the Bays in the Marlborough Sounds would have 20 dwellings and 10 coastal structures - no sharing.
62. Multiple uses are already well established in law and doubt that Policy 25 would have any discernible effect on current coastal development trends. This policy should only apply to structures on land of the Crown in the coastal marine area. While it may be "practicable" to remove such structures, it may not be consistent with sustainable management and therefore the policy is too absolute. For example removal of petroleum pipelines buried below the sea bed may create more damage to the environment than leaving them where they are.
63. Remove loophole in terms of having to deal with unused structures and ensure that such decommissioning is done in a manner that has due regard to natural environment. Need a method for dealing with buildings and structures that were erected without consent, because of their age. Consider that these buildings should be treated as through they had been erected by consent regardless of age. "Orphan" structures are often the main problem, and hence cannot be addressed through consent conditions.
64. Reclamation may be appropriate in certain areas of the coast where the effects of reclamation can be mitigated or remedied or it is part of a development contributing to public amenity and for particular developments. This should be a matter for individual regional and districts. Policy 27 in its present form is overly focused on the adverse effects of reclamations and ignores the fact that a reclamation may be expanding an existing piece of infrastructure of significant value to the county and there would be benefits from the expanded operation.

65. Policy 27 needs more explicit reference to the potential needs of "existing uses" for coastal infrastructure, such as ports, road or rail. Where future growth may require additional reclamation to the facilities already in place.
66. NZCPS seeks to ensure as far as possible that any new reclamation is visually aesthetically compatible with the adjoining coast. But that has no regard to whether the adjoining coast is under redevelopment and is intended to be converted into a new use with a completely different "feel" about it. It has no regard to the fact that modern materials and technologies can provide a much improved engineering and design solution to the existing aesthetics.
67. "Any new activity" could be interpreted as requiring both users of the coastal marine area and the Minister of Conservation to incur costs in negotiating a new lease or other interests every time a slight modification to an activity within the coastal marine area occurs.
68. There is a tendency to use the word "natural" as being restricted in meaning to the very narrow interpretation of being pristine, undeveloped, or implying original native bush. What is "natural" should include the wide open rural spaces of the landscape, perhaps now grazed with sheep and cattle, as well as native bush and grasslands (dense or otherwise). Policy 31 makes it a national priority to protect indigenous biodiversity in the coastal environment without recognising that many of New Zealand's harbour environments are highly urbanised where indigenous biodiversity must be managed, not categorically protected.
69. The goal to conserve at least 10% of New Zealand's coast needs to include areas of high biodiversity and national significance and not be restricted to areas of maximum convenience.
70. The NZCPS has more of a "thrust" towards protecting the values of coastal areas which are significant or special, but which might not be "outstanding".
71. Esplanade reserves and strips are provided for under the RMA 1991. The policy should leave consideration of the waiver to regional policy statements and plans
72. There are enough serious issues arising from irresponsible or unintentionally harmful use of vehicles to require careful scrutiny in terms of public safety and especially biodiversity damage (both on habitats and single species such as toheroa) where rare and endangered seabirds are being adversely affected by intrusions. There are areas that warrant a complete ban of vehicle access, such as the Conway River lagoon in North Canterbury.
73. Many parts of the Lambton Harbour Development Area are comprised of buildings and other facilities constructed on wharves. Not all are used for docking or mooring facilities. Some support a mixture of recreational and commercial uses. Many of these structures do not provide facilities for sewage and waste collection or for the collection of residues from vessel maintenance. The current definition of "marine facilities" in the Glossary would include such structures and all "associated structures and activities". Policy 50(a) does not appropriately recognise that the use of marine facilities will necessitate some localized contamination of coastal waters and substrate. It is unclear what is meant by the term "adverse contamination" to some degree, all contamination is "adverse".
74. It may not always be practical to avoid new subdivision and residential or commercial development in areas potentially affected by tsunamis. New Zealand's entire coastline is 'potentially' affected by coastal hazards. As worded Policy 52 would impact on all of NZ

coastal areas, meaning that no 'new' or unoccupied areas could be considered for new subdivision and or development.

75. While it is accepted that subdivision of a residential nature should not be located in coastal hazard areas, commercial developers can appropriately assess and provide for the risks of locating in such areas and should not necessarily be prevented from doing so. Provision should be made for appropriate assessment and mitigation. There should be some latitude in the extent of risk such as "more than minor". Otherwise it can be a catch-all provision meaning any risk must be avoided and such decisions lack common sense.
76. Support the discouraging of the use of hard protection structures, especially those that have detrimental impacts on the public amenity and natural character; at present, hard protection structures such as seawalls are being built in the CMA for the advantage of relatively few home owners at the expense of public amenity. Needs to be recognised that engineering approaches have a limited design life. Adopting approaches based on protection structures or other engineering approaches can lock in future generations to continued expenditure to maintain, upgrade or replace any such protection.
77. NZCPS to recognise the highly modified nature of the coast in many urban areas, where protection works are an integral part of the coast and form the basis on which the coast is used. The policy should recognise that hard protection structures may be appropriate in some places, such as where wave energy is low. They are based on the premise that hard protection structures have an adverse effect on the beach. This premise is not supported by the literature. For example the Punakaiki Community (West Coast - South Island) agreed to a "soft" engineering option which only last five years and then had to fund a "hard" engineering option, effectively paying twice.
78. We are concerned that the effects of sea-level rise and environmental changes associated with climate change are not adequately addressed in the policies regarding use and development. We recognise that Policy 52 does require coastal hazard planning, and we think that to be internally consistent, such planning should also be included in Policies 14-16
79. It is not clear why other forms of development such as the provision of infrastructure are not included in this policy. They should also be located away from areas subject to coastal hazard risk.
80. The NZCPS should require that local authorities enable modifications to existing buildings within the coastal environment, where this will make them more responsive to coastal hazards - for example through retrofitting of buildings to make them relocateable and/or less susceptible to damage. Policy 54 needs to encourage local authorities to adopt a much more strategic approach to identifying where protection structures or other engineered approaches may form the most sustainable long term solution to managing coastal hazard risk.
81. "Protection" could imply that there is a need to intervene and protect a natural feature.
82. There is a failure to recognise that hard protection structures such as stop banks can enhance access. In the case of Invercargill the stop bank along the upper estuary has been developed as a walking/cycling track and gives people access to a part of the estuary that was not previously accessible.
83. The impacts of erosion and sedimentation resulting from subdivision and development should be addressed through more detailed policy development.

84. The NZCPS does not provide for particular regard to “the benefits to be derived from the use and development of renewable energy” Section 7(j). Given renewable energy sources often have a functional necessity to locate in the coastal marine area (tidal) or coastal environment (windfarms). The NZCPS should include specific provision for this matter and direct other planning documents to set a policy direction to ensure that these activities are provided for in accordance with the RMA.
85. Direction on subdivision, use and development needs to be decided at the local level with the consideration of local needs and preferences.
86. Policy 14 is in conflict with the effects based approach of the RMA and Policy 15 may be ultra vires. Promotion of subdivision and development within specific areas is not really a function for regional councils under the RMA, as it is not an effects-based control and is beyond reasonable monitoring.
87. Policies 14 and 15 inappropriately separate location and form issues for subdivision, use and development. Location and form are completely integrated.
88. If development is already zoned to occur but may not yet have taken place, it is unclear whether Policy 14 is directing local authorities to remove current zonings that may have been in place for many years.
89. Greater cognisance must be taken of the nature and loss of agricultural land to coastal development.
90. Policy 16, combined with the advocacy of certain activities (such as aquaculture) in the NZCPS, creates a contradictory and conflicting message to councils as to how to deal with such issues.
91. Some activities can only take place on wharves or pontoons actually in the coastal marine area. Most successful urban waterfronts are built on this basis and Policy 14(d) as presently worded is contrary to good design and good quality waterfront projects.
92. Policy 32(f) does not go far enough as it merely repeats the landscape assessment criteria identified by the Environment Court in the decision of Pigeon Bay Aquaculture Ltd v Canterbury Regional Council [1999] NZRMA 209.
93. The policies discouraging continued urban development seem both weak and difficult to apply. There is potential for considerable dispute over what constitutes “continuous”.
94. The language in the current NZCPS was superior. This is a narrow policy that only discourages unnecessary proliferation by one measure. It is not appropriate that abandoned or redundant structures should be allowed to remain in the coastal marine area.
95. Consider the proliferation of rural-residential subdivision as well as sprawl or agglomeration. The term “sporadic” development needs to be reinstated, since “urban sprawl” does not usually include lifestyle or countryside living development.
96. There seems to be no recognition of enabling a suitable rate of development and the need to take into account growth.
97. Schedule II is unnecessarily and inappropriately detailed and would increase compliance costs for local authorities. In many cases, activities in the coastal marine area are modest jetties, pontoons, piles, moorings, cables on the seabed etc.

## Additional Provisions Sought

98. Submission 497.29 requests that a new policy be added to protect some areas from subdivision use and development, as follows:

Local authorities shall identify sites and areas within the coastal environment where subdivision or development shall not occur due to outstanding natural or development shall not occur due to outstanding natural features or landscapes significant biodiversity values sites of cultural significance, historic heritage or high public amenity value.

99. Submission 68.1 states that New Zealand has reached a critical stage in the use and protection of coastal dunes, particularly the larger transgressive dune systems. The NZCPS should identify the remaining 50 dune systems of exceptional conservation value (in new schedule) and direct that adverse effects arising from activities in or adjacent to these systems should be avoided. The following policy was suggested:

Policy # Protection of active coastal dunes:

The protection of the active coastal dunes listed in Schedule # is a national priority. Plans and policy statements should ensure these dune systems are protected from inappropriate use and development, including by:

- (a) ensuring that activities within, adjacent to, or downdrift from, these dune systems to not result in the establishment of invasive exotic plants;
- (b) encouraging the restoration of degraded dune systems;
- (c) providing appropriate public access and information;
- (d) avoiding development that adversely affects the ecology, botany or geomorphology of these dune systems, including disturbance to coastal sand systems in the adjacent coastal marine area;
- (e) avoiding damaging off-road vehicle use;
- (f) protecting archaeological site; and
- (g) by establishing appropriate environmental monitoring of dune system condition.

100. Submission 240.11 requests that a new policy be added which discourages ribbon development along the coast.

101. Submission 240.12 requests a new policy to encourage long term certainty over future land use through mechanisms such as covenants.

102. Submission 493.25 considers that additional clauses are required, so that once a location is generally deemed suitable for subdivision and development consideration as to the appropriate form is tempered by potential impacts on natural character climate change and the Waitakere Ranges Heritage Areas Act.

103. Submission 340.2 requests that Policies 14, 15, and 16 be deleted and replaced with a single policy as follows:

Policy Statements and Plans shall take into account the open space character, natural character, and amenity values of the coast, and sites of significant indigenous biological diversity by:

- 1) Recognising the importance of appropriate set-back distances for the sub-division, use, and development in the coastal environment considering the storm events and other coastal processes;
- 2) Limiting the scale, density, and design of subdivision and development; and

3) Avoiding the sub-division, use, and development activities which by their nature shall not be located in the coastal marine area.

104. Submission 73.39 requests seeks the removal of Policy 14 and a new policy similar to that provided below:

Policy Statements and plans shall identify where, in the coastal environment, (outside the coastal marine area) subdivision and development is appropriate.

105. Submission 365.28 considers that the NZCPS should also name and discourage “high rise development” or “towering” development along ocean beach coast.

106. Submission 82.6 requests the addition of policy and criteria to address the identification of areas of the coastal environment that should be protected.

107. Submission 199.19 requests that further provisions are included to provide more detail to address the need to design coastal development in a manner that is subservient to the natural coastal landscape.

108. Submission 121.8 requests that policies be created or changed to ensure high standards of landscape and biodiversity conservation for areas suitable for low density development.

109. Submissions 147.33 (and others) request a new Policy 15A is inserted which provides a holding position while councils implement policies 14 and 15 in their planning documents. This could be achieved by providing that the minimum lot size for subdivision of land within the coastal environment outside of existing settlement areas be 100 hectares. The provision should be directly incorporated into planning documents without the need for a public hearing process.

110. Submissions 147.34 (and others) request the insertion of a new policy 15B which indicates the desirability of ensuring in appropriate cases that covenants are placed on land titles at the time of subdivision to restrict any future subdivision. This could be achieved through wording such as the following:

Policy 15B Restricting future subdivision and development

When granting a resource consent for subdivision of rural land within the coastal environment local authorities shall consider whether a covenant restricting future subdivision and development of the land should be provided as a condition of the consent.

111. Submissions 147.35 (and others) request the addition of a policy that discourages land banking. This could be achieved through the following wording:

Policy 15C Discouraging landbanking

In order to control subdivision in the coastal environment in excess of foreseeable demand, policy statements and plans shall:

- (a) prohibit coastal subdivision outside existing settlements except where (b) below applies.
- (b) allow limited additional provision for coastal subdivision only where the existing stock of subdivided land within the district provides insufficient capacity to meet the reasonable needs of the district during the life of the policy statement or plan provided the additional subdivision:-
  - (i) does not exceed the capacity required to meet those needs during the life of the policy statement or plan; and

- (ii) avoids areas with significant heritage, landscape or natural character values; and
- (iii) is otherwise consistent with this policy statement.

112. Submission 121.7 believes that the NZCPS does not encourage long term certainty over future land use. They suggest this be remedied through the development of policies that encourage long-term certainty over future land use through mechanisms such as covenants.

113. Submission 252.12 seeks to reference and prescribe by way of policy formulation the adoption of a more flexible range of mechanisms to address the issue of coastal hazards in relation to existing development, including those recommended in the guidance manual.

114. Submission 17.19 considers that the NZCPS needs to provide more clearly for the recognition and integration of marine reserves and other Marine Protected Areas as recognised by the Marine Reserves Act and by new MPA Policy standards, as follows:

Marine reserves and other recognised marine protected areas (as defined by the Marine Protected Areas classification, protection standard and implementation guidelines, Table 2) shall be protected from inappropriate use and development, including by:

- (a) Ensuring that activities in the coastal marine area do not adversely affect the marine reserve or marine protected area; and
- (b) Avoiding, remedying or mitigation adverse effects of other activities on access to, and use and enjoyment of marine reserves and other marine protected areas.

115. Submission 294.39 considers that new policy is required for addressing potential cross boundary issues that may exist for subdivision, use and development in the coastal environment.

116. Submission 358.026 considers that the NZCPS should include specific provision for the benefits to be derived from the use and development of renewable energy (Section 7(j) of the RMA) and direct other planning documents to set a policy direction to ensure that these activities are provided for in accordance with the RMA. This submission suggests the insertion of new policy as follows, or wording of similar effect:

Policy statements and plans shall provide particular guidance for locating and facilitating activities associated with renewable energy generation within the coastal marine area and coastal environment, in recognition of the benefits of such development with regard to the matters identified in Part II of the RMA.

117. Submission 378.23 requests the adoption of the existing Policy 3.2.1 wording as follows:

Policy statement and plans should define what form of subdivision, use and development would be appropriate in a coastal environment, and where it would be appropriate.

118. Submission 455.58 and others seek consideration of the following:

- a) That NZCPS includes a spatial plan which identifies areas where there is a high national interest in preservation. The spatial plan should be accompanied by objectives, policies and rules excluding incompatible activities, which can be incorporated into all regional and district plans. Local authorities could then be required to identify regionally and locally significant areas, and make provision for their protection.
- b) Better control of urban intensification and sprawl through a requirement that territorial authorities control urban sprawl by identifying boundaries for all coastal settlements,

and incorporating these within their district plans with appropriate rules to keep urban development within defined limits.

- c) Management of rural-lifestyle developments by requiring councils to ensure that there is evidence of significant net environmental benefit from the subdivision of coastal land outside urban limits before consent can be granted.
- d) Discouraging land-banking by requiring that district plans may not be provided for, nor consents granted for, the creation of more lots in the coastal environment than would be required to meet likely demand through the life of the plan.

119. Submission points 101.9 and 101.10 request the inclusion of a new policy which explicitly addresses Objective 1 and in particular social, economic, and cultural wellbeing as follows:

All persons exercising functions and powers under the Act in relation to the coastal environment shall:

1. Recognise and provide for the importance to the social and cultural wellbeing of people and communities, of living in the coastal environment;
2. Recognise the important contribution which high quality urban land can make to the amenities of the coastal environment; and
3. Recognise the important contribution which high quality urban development in the coastal environment can make to the economic wellbeing of people and communities by the accommodation of growth and by the avoidance of urban sprawl (through compact urban form).

120. Submission 126.10 (and others) expresses concern over the encroachment of private property onto public land on the foreshore and requests the addition of a clause or Policy to the effect that private encroachment onto public land is avoided, and the effects of existing encroachments are remedied.

121. Submission 124.18 considers that there are insufficient objectives recognising that some uses and development depend upon the use of the coastal environment and functionally can only be located on the coast. A new objective should be included as follows:

Use and development that enables people and communities to provide for their social, economic and cultural wellbeing and for their health and safety, which functionally can only be located in the coastal environment and in the coastal Marine area in particular, or which derives particular benefits from such a location, should be provided for.