

**Before the Hearings Panel  
At Porirua City Council**

**Under** Schedule 1 of the Resource Management Act 1991

**In the matter of** the Proposed Porirua District Plan

**Between** **Various**

**Submitters**

**And** **Porirua City Council**

**Respondent**

---

**Council reply on Natural Character and Public Access – Hearing Stream 2 –  
Caroline Elizabeth Rachlin on behalf of Porirua City Council**

**Date: 22 December 2021**

---

## **INTRODUCTION:**

1 My full name is Caroline Elizabeth Rachlin. I am employed as a Senior Policy Planner for Porirua City Council.

2 I have read the evidence and tabled statements provided by submitters relevant to the Section 42A Report – Part B Natural Character and Public Access.

3 I have prepared this Council reply on behalf of the Porirua City Council (**Council**) in respect of matters raised through Hearing Stream 2.

4 Specifically, this statement of evidence relates to the matters in the Section 42A Report – Part B Natural Character and Public Access (s42A report).

5 I am authorised to provide this evidence on behalf of the Council.

## **QUALIFICATIONS, EXPERIENCE AND CODE OF CONDUCT**

6 Appendix C of my s42A report sets out my qualifications and experience.

7 I confirm that I am continuing to abide by the Code of Conduct for Expert Witnesses set out in the Environment Court's Practice Note 2014.

## **SCOPE OF REPLY**

8 This reply follows Hearing Stream 3, held on 6 – 8 and 10 December 2021. Minute 9 of the Hearing Procedures allows for s42A report authors to submit a written reply by 22 December.

9 The main topics addressed in this reply include:

- NATC-01
- Introduction to NATC – Natural Character Chapter

- Minor error

- 10 The order of this reply broadly follows that of the s42A report.
- 11 If I have not addressed a matter in this reply that was raised by a submitter throughout the hearings process, I have no further reply to add to what I have set out in the s42A report, my Statement of Supplementary Planning Evidence (Supplementary Evidence) or my evidence given at the hearing.
- 12 Appendix 1 has a list of materials provided by submitters including expert evidence, legal submissions, submitter statements etc. This information is all available on the PDP (Proposed District Plan) hearings web portal at <https://pdportal.porirua.govt.nz>.
- 13 Appendix 2 has recommended amendments to PDP provisions, with updated recommendations differentiated from those made in Appendix A of the s42A report.
- 14 Appendix 3 has an updated table of recommended responses to submissions and further submissions, with updated recommendations differentiated from those made in Appendix B of the s42A report.

#### **NATC-01**

- 15 The Panel asked through Minute 9, is there scope for the recommended amendment to NATC-01.
- 16 The relief sought by Te Awarua-o-Porirua Harbour & Catchments Community Trust, and Guardians of Pāuatahanui Inlet [77.9, 77.10] on NATC-01 includes replacing the words 'where appropriate' with the words 'wherever practicable'. As set out in the s42A report these submitters sought two sets of amendments through two separate submission points as follows. Their requested changes are shown below:

*The natural character of coastal margins and riparian margins are preserved, enhanced ~~where appropriate~~ wherever practicable, and protected from ~~inappropriate~~ all adverse effects from subdivision, use and development.*

*The natural character of coastal margins and riparian margins are preserved, and enhanced ~~where appropriate~~ wherever practicable, and protected from inappropriate subdivision, use and development and any adverse effects caused by subdivision, use and development on any part of the harbour and its contributing catchments.*

- 17 At paragraph 78 of my s42A report I recommended that NATC-01 be amended to replace ‘where appropriate’ with ‘where possible’.
- 18 Having given this further consideration, I am of the view that there is not scope to make this change as it would go beyond (be more stringent) than what the submitters requested.
- 19 Consequently, I have considered if the inclusion of ‘wherever practicable’ (as sought by the submitters) should replace ‘where appropriate’.
- 20 I raised a concern in my s42A report that ‘where appropriate’ requires a degree of assessment. I consider that this is similarly the case with ‘wherever practicable’. As such in my view it is more appropriate to retain the notified wording. This continues to give effect to Policy 25 of the Greater Wellington Regional Policy Statement (RPS) and provides for consistency with proposed changes to Strategic Objective NE-01, as set out in the Council Reply on Strategic Objectives in Hearing Stream 2. What is appropriate or not is determined through NATC-P1 and NATC-P2.
- 21 In recommending the retention of ‘where appropriate’ as shown below, I recommend that the submissions from Te Awarua-o-Porirua Harbour &

Catchments Community Trust, and Guardians of Pāuatahanui Inlet [77.9, 77.10], be **rejected**.

<b>NATC-01</b>	<b>Protecting, preserving and enhancing natural character</b>
The natural character of coastal margins and riparian margins are preserved, and enhanced <del>where appropriate</del> <del>where possible</del> <u>where appropriate</u> , and protected from inappropriate subdivision, use and development.	

### Introduction to NATC – Natural Character Chapter

22 At the hearing the Panel asked whether the introduction to the NATC – Natural Character Chapter should be amended to clarify responsibilities for water bodies.

23 This matter relates to paragraph 4 of the introduction as shown below:

*The Porirua City Council works with the Greater Wellington Regional Council and Ngāti Toa Rangatira to ensure the coast and waterbodies are managed in an integrated way.*

24 I have considered this matter further, and while I recognise that there are different jurisdictional responsibilities for regional councils and territorial authorities in regards to waterbodies<sup>1</sup>, I do not consider it is necessary to outline these responsibilities in this introduction.

25 If the Panel sought to outline this point in the PDP, I consider a more appropriate place is within Part 1 – Statutory Context. However, I do not consider that there is a significant interpretation issue to necessitate any such explanatory content be added to the introduction to the NATC-Natural Character Chapter or to Part 1 of the PDP.

---

<sup>1</sup> Sections 30 and 31 of the Resource Management Act

**Minor error**

26 During the hearing I updated two corrections on my s42A report in relation to a submission from Transpower [60.78]. The corrections were:

- At paragraph 63 of the s42A report, to replace the words 'accepted' with 'accepted in part'; and
- In Appendix B, Table B1, in relation to submission 60.78 to amend the last column to 'See body of the report'.

27 I have shown the correction to the table within Appendix 3 of this report.

**Date:** 22/12/2021

*Cl Rachin*

.....

## Appendix 1 – List of materials provided by submitters

<b>Submitter evidence</b>	<p>Graeme La Cock for the Director-General of Conservation [126 and FS39]</p> <p>João Paulo Silva for the Director-General of Conservation [126 and FS39] (including addendum)</p> <p>Pauline Whitney for Transpower New Zealand [60 And FS04]</p>
<b>Submitter legal submissions</b>	<p>Ezekiel Hudspith For Transpower New Zealand [60 and FS04]</p> <ul style="list-style-type: none"> <li>• Attachment 1 - Transpower NZ [60 And Fs04] -Eds Inc V NZ King Salmon Co Ltd [2014] NZSC 38</li> <li>• Attachment 2 - Transpower Nz [60 And Fs04] -Darby Planning Ltd Partnership &amp; Others V Qldc [2021]</li> <li>• Attachment 3 - Transpower Nz [60 And Fs04] -Darby Planning Ltd Partnership &amp; Others V Qldc [2019]</li> </ul> <p>Katherine Anton and Rosemary Broad for the Director-General of Conservation [126 And FS39]</p> <p>Nick Whittington for Kāinga Ora [81 And FS65]</p>
<b>Submitter statements</b>	<p>GWRC Memorandum on Wetlands Regulation - 10 November 2021 [137 And Fs40]</p> <p>Submitter Statement - Andrew Tierney [18]</p> <p>Submitter Statement - Donald Mather [57]</p> <p>Submitter Statement - Frances McNamara [259 and FS31]</p> <p>Submitter Statement - Fulton Hogan [262]</p> <p>Submitter Statement - Ian Fowler [165]</p> <p>Submitter Statement - Jeremy Collyns [26]</p> <p>Submitter Statement - Jeremy Collyns [30]</p> <p>Submitter Statement - Mark Philips [235]</p> <p>Submitter Statement - Mary and Philip Major [163]</p> <p>Submitter Statement - Milmac Homes Ltd [258 and FS59]</p> <p>Submitter Statement – Murry Cave [173]</p> <p>Submitter Statement - Pikarere Farm Limited [183]</p> <p>Submitter Statement - Progeni Limited [271] - Updated 4 November 2021</p> <p>Submitter Statement - Remi Leblanc [217]</p> <p>Submitter Statement - Ryan Family Trust [138] Replaced Version - 1 November 2021</p> <p>Submitter Statement - Samantha Montgomery Ltd [223 and FS55]</p>

	<p>Submitter Statement- Grant Abdee [238]</p> <p>Submitter Supplementary Statement - Robyn Smith [168]</p>
<b>Submitter tabled statements</b>	<p>Submitter Tabled Statement - Fire and Emergency NZ [119 and FS54]</p> <p>Submitter Tabled Statement - Guardians of Pauatahanui Inlet and The Porirua Harbour Trust [77] - 2 November 2021</p> <p>Submitter Tabled Statement - Joanna Alderdice [275]</p> <p>Submitter Tabled Statement - Juan Qu [Fs02]</p> <p>Submitter Tabled Statement - Pamela Meekings-Stewart [100] - 14 November 2021</p> <p>Submitter Tabled Statement - Phyllis Sexton [15]</p> <p>Submitter Tabled Statement - Te Awarua-O-Porirua Harbour &amp; Catchments Community Trust and Guardians of Pauatahanui Inlet [77]</p> <p>Submitter Tabled Statement - Waka Kotahi (NZTA)[82]</p>
<b>Submitter presentations</b>	<p>Speaking Notes – Pauline Whitney for Transpower [60]</p> <p>Speaking Notes – Forest &amp; Bird [225 and Fs52]</p> <p>Submitter presentation – Andrea &amp; Karl Simonlehner [110]</p> <p>Submitter presentation – Christine Stanley [106]</p> <p>Submitter presentation – Mary and Philip Major [163]</p> <p>Submitter presentation – Paul Botha [118 and Fs27]</p> <p>Submitter presentation – Progeni Limited [271]</p> <p>Submitter presentation – Robyn Smith [168]</p> <p>Submitter presentation – Steven Kovacs [205]</p> <p>Submitter presentation – Whitireia Park Restoration Group [150]</p>



## Appendix 2 – Recommended amendments to PDP provisions

In order to distinguish between the recommendations made in the s42A report and the recommendations that arise from this report:

- s42A recommendations are shown in red text (with underline and ~~strike out~~ as appropriate); and
- Recommendations from this report in response to evidence are shown in blue text (with underline and ~~strike-out~~ as appropriate).

# NATC - Natural Character

Porirua City has 55km of coastline, enclosing one of the largest estuaries in the lower North Island, Te Awarua-o-Porirua Harbour. Te Awarua-o-Porirua Harbour and its catchment contribute significantly to the City's natural character, including its identity and sense of connection to the environment. The harbour is highly valued by the community and tangata whenua.

There are no large freshwater bodies within Porirua, but there are numerous streams and wetlands within the catchment that are also highly valued.

The coastal margins and riparian margins adjacent to the coast, Te Awarua-o-Porirua Harbour, streams and wetlands have natural character values and provide public and customary access to the coast and freshwater bodies, while also providing public amenity, recreation, hazard management and ecological values within the City. This chapter addresses the natural character of coastal margins and riparian margins.

The Porirua City Council works with the Greater Wellington Regional Council and Ngāti Toa Rangatira to ensure the coast and waterbodies are managed in an integrated way.

Provisions relating to coastal high natural character areas in the coastal environment are located in the Coastal Environment chapter, while this chapter focuses on the wider natural character of coastal margins. This chapter does not contain provisions for the natural character of wetlands and relies on other provisions and methods within and outside of this Plan that address the wider values of wetlands, which include their natural character. These include the Ecosystems and Biodiversity Chapter and Strategic Objective NE-O1 of this Plan, and provisions for wetlands in the Greater Wellington Regional Council's proposed Natural Resources Plan.

## Objectives

### NATC- O1 Protecting, preserving and enhancing natural character

The natural character of coastal margins and riparian margins are preserved, and enhanced ~~where appropriate~~ where possible where appropriate<sup>2</sup>, and protected from inappropriate subdivision, use and development.

## Policies

### NATC- P1 Appropriate buildings and structures

Enable buildings and structures in coastal margins and riparian margins where these:

1. Have an operational need and functional need for their location; and

---

<sup>2</sup> [Te Awarua-o-Porirua Harbour & Catchments Community Trust and Guardians of Pāuatahanui Inlet \[77.9, 77.10\]](#)

2. Are of a form, scale and nature that will not detract from the natural character of the coastal margin or riparian<sup>3</sup> margin, including parks facilities and furniture; buildings and structures associated with boating facilities and hazard mitigation activities.

**NATC- Inappropriate buildings and structures  
P2**

Avoid all other buildings and structures in coastal margins and riparian margins unless it can be demonstrated that:

1. The natural character and amenity values of the coast, the waterbodies and their margins will not be adversely affected;
2. There is a functional need or operational need for a building or structure's location, and no alternative locations are practicable;
3. Public access, customary access and recreational use is already possible and can be maintained for the future;
4. The ecological values of the margin will not be adversely affected; and
5. Natural hazard risk will not be increased, taking into account the likely long term effects of climate change.

**NATC- Appropriate earthworks  
P3**

Allow for small-scale earthworks in coastal margins and riparian margins where natural character values are maintained.

**NATC- Inappropriate earthworks  
P4**

Only allow other earthworks within coastal margins and riparian margins where it can be demonstrated that they are appropriate, by taking into account:

1. The effect of the earthworks by scale, volume, depth and location (visibility) on the characteristics and values of the coastal margin or riparian margin;
2. The ability to restore or rehabilitate earthwork areas;
3. How the alignment and location of the earthworks are designed to reduce cut heights and minimise changes to the landform and visual impact;
4. Erosion and sediment control measures; and
5. Effects on indigenous vegetation and effects of the removal of indigenous vegetation on the characteristics and values of the coastal margin or riparian margin.

**Rules**

Note: There may be a number of provisions that apply to an activity, building, structure or site. Resource consent may therefore be required under rules in this chapter as well as other chapters. Unless specifically stated in a rule, resource consent is required under each relevant rule. The steps to determine the status of an activity are set out in the General Approach chapter.

Rules relating to subdivision, including minimum allotment sizes for each zone, are found in the Subdivision chapter.

---

<sup>3</sup> Minor correction under Clause 16

<b>NATC-R1</b>	<b>Buildings and structures within coastal margins and riparian margins, including additions to existing buildings and additions to existing structures</b>
<b>All zones</b>	<p>1. Activity status: <b>Permitted</b></p> <p>Where:</p> <ul style="list-style-type: none"> <li>a. The buildings or structures are in the Open Space Zone or Sports and Active Recreation Zone and are for: <ul style="list-style-type: none"> <li>i. Parks facilities or parks furniture; or</li> <li>ii. Boating facilities.</li> </ul> </li> <li>b. The buildings or structures are for hazard mitigation activities and undertaken by a statutory agency or their nominated contractor or agent; and</li> <li>c. The structure is a fence used for farming purposes and is constructed in post and wire.</li> </ul>
<b>All zones</b>	<p>2. Activity status: <b>Restricted discretionary</b></p> <p>Where:</p> <ul style="list-style-type: none"> <li>a. Compliance is not achieved with NATC-R1-1.a, NATC-R1-1.b, or NATC-R1-1.c.</li> </ul> <p>Matters of discretion are restricted to:</p> <ul style="list-style-type: none"> <li>1. The matters in NATC-P2.</li> </ul>
<b>NATC-R2</b>	<b>Earthworks within coastal margins and riparian margins</b>
<b>All zones</b>	<p>1. Activity status: <b>Permitted</b></p> <p>Where:</p> <ul style="list-style-type: none"> <li>a. The earthworks are in the Open Space Zone or Sports and Active Recreation Zone and are for: <ul style="list-style-type: none"> <li>i. The construction, <u>maintenance and upgrading</u><sup>4</sup> of parks facilities or parks furniture; or</li> <li>ii. The construction, <u>maintenance and upgrading</u><sup>5</sup> of boating facilities; or</li> </ul> </li> <li>b. The earthworks are for hazard mitigation activities and undertaken by a statutory agency or their nominated contractor or agent; or</li> <li>c. Compliance is achieved with NATC-S1.</li> </ul>
<b>All zones</b>	<p>2. Activity status: <b>Restricted discretionary</b></p> <p>Where:</p> <ul style="list-style-type: none"> <li>a. Compliance is not achieved with NATC-R2-1.a, NATC-R2-1.b or NATC-R2-1.c.</li> </ul> <p>Matters of discretion are restricted to:</p>

<sup>4</sup> PCC [11.48]

<sup>5</sup> Ibid

1. The matters in NATC-P4.

**Standards**

**NATC-S1**

**Earthworks within coastal margins and riparian margins**

**All zones**

1. The quantity of earthworks is limited to 25m<sup>2</sup> in any 12 month period per site.
2. The cut height or fill depth must not exceed 0.5m measured vertically.

Matters of discretion are restricted to:  
1. The matters in NATC-P4.

### **Appendix 3 – Recommended responses to submissions and further submissions**

In order to distinguish between the recommended responses in the s42A report and the recommended responses that arise from this report:

- Recommendations from this report in response to evidence are shown in blue text (with underline and ~~strike-out~~ as appropriate).

Table B 1: Recommended responses to submissions and further submissions - NATC - Natural Character Chapter

Sub. Ref.	Submitter / Further Submitter	Provision	Decision Requested	Section of this Report where Addressed	Officer's Recommendation	Officers' Reasons/Comments	Recommended Amendments to PDP?
225.43	Forest and Bird	General	Clarify what and where the coastal margin is.	3.2	Reject	See body of the report	No
225.252	Forest and Bird	General	Add setbacks to waterbodies within rules to provide for riparian management considerations.	3.2	Reject	See body of the report	No
225.180	Forest and Bird	General	Amend to say that significant values of wetlands in terms of indigenous biodiversity are addressed in the ECO provisions. Amend to say this chapter applies outside the coastal environment and recognise that activities landward of the coastal environment may have downstream effects which are recognised in the activity focused chapters having regard to the policy direction in this chapter and the Coastal Environment Chapter.	3.2	Reject	See body of the report	No
264.51	TROTR	General	Retain as notified.	N/A	Accept in part	Accept in part, subject to amendments made in response to other submissions	No
81.432 <sup>6</sup>	Kāinga Ora	Multiple provisions	Amend to be consistent with its overall submission on the Plan. Key areas of concern are (but not limited to):  1. Inclusion of earthworks rules within the earthworks chapter  2. Amend provisions with direct 'avoid' statements. This needs to be qualified in light of the King Salmon meaning of 'avoid'.	N/A	Reject	See body of the report	No
60.78	Transpower	General	Retain the Natural Character Chapter.  If the chapter applies to the National Grid, amend provisions to reflect the relief sought in submission.  [Refer to original submission and specific submission points for full decision requested]	N/A	Accept in part	<del>Accept in part, subject to amendments made in response to other submissions</del> See body of the Right of Reply	No
77.9	Te Awarua-o-Porirua Harbour & Catchments Community Trust, and Guardians of Pauatahanui Inlet	NATC-O1	Amend:  The natural character of coastal margins and riparian margins are preserved, enhanced <del>where appropriate wherever practicable</del> , and protected from <del>inappropriate</del> all adverse effects from subdivision, use and development.	3.3	<del>Accept in part</del> Reject	<del>See body of the report</del> See body of the Right of Reply	Yes
77.10	Te Awarua-o-Porirua Harbour & Catchments Community Trust, and	NATC-O1	Amend:  The natural character of coastal margins and riparian margins are preserved, and enhanced <del>where appropriate wherever</del>	3.3	<del>Accept in part</del> Reject	<del>See body of the report</del> See body of the Right of Reply	Yes

<sup>6</sup> GWRC – Oppose [FS40.81]

Sub. Ref.	Submitter / Further Submitter	Provision	Decision Requested	Section of this Report where Addressed	Officer's Recommendation	Officers' Reasons/Comments	Recommended Amendments to PDP?
	Guardians of Pauatahanui Inlet		<u>practicable</u> , and protected from inappropriate subdivision, use and development <u>and any adverse effects caused by subdivision, use and development on any part of the harbour and its contributing catchments.</u>				
126.24	DOC	NATC-O1	Retain as notified, but also provide policy direction for any areas of outstanding natural character that are identified during the life of the plan	3.3	Reject	See body of the report	Yes
225.181	Forest and Bird	General	Amend or delete and replace the policies to provide direction for the protection and preservation of Natural character in the coastal environment and freshwater bodies including their margins.	3.3	Reject	See body of the report	No
86.48	KiwiRail	NATC-P1	Retain as proposed.	N/A	Accept	Agree with submitter	No
77.11	Te Awarua-o-Porirua Harbour & Catchments Community Trust, and Guardians of Pauatahanui Inlet	NATC-P3	Amend:  Allow for small-scale earthworks in coastal margins and riparian margins <u>only where they have no adverse effects on the harbour and its contributing catchments and where the natural character values and ecological condition of the harbour are maintained and, preferably, enhanced.</u>	3.3	Reject	See body of the report	
86.49	KiwiRail	NATC-P3	Retain as proposed.	N/A	Accept	Agree with submitter	No
11.48	PCC	NATC-R1	Amend the rule as follows:  1. Activity status: <b>Permitted</b>  Where:  a. The earthworks are in the Open Space Zone or Sports and Active Recreation Zone and are for:  b. The construction, <u>maintenance and upgrading</u> of parks facilities or parks furniture; or  i. The construction, <u>maintenance and upgrading</u> of boating facilities; or  ii. The earthworks are for hazard mitigation activities and undertaken by a statutory agency or their nominated contractor or agent; or  c. Compliance is achieved with NATC-S1.	3.4	Accept	See body of the report	Yes
168.56	Robyn Smith	NATC-R1	Amend the rule so that non-complying is the default activity status where there is non-compliance with rules NAT-C-R1-1.a, NAT-C-R1-1.b, or NAT-C-R1-1.c.	3.4	Reject	See body of the report	



Sub. Ref.	Submitter / Further Submitter	Provision	Decision Requested	Section of this Report where Addressed	Officer's Recommendation	Officers' Reasons/Comments	Recommended Amendments to PDP?
168.57	Robyn Smith	NATC-R2	Opposed to any provision of the PDP by way of submissions by others, or by council officer evidence and/or recommendations, that would result in broadening the scope of rule NATC-R2 to encompass other activities.  Amend the rule so that non-complying is the default activity status where there is non-compliance with rule NATC-R2-1.	3.4	Reject	See body of the report	No
225.251	Forest and Bird	Whole of Plan	Add provisions to recognise riparian margins within the earthworks and biodiversity chapters and other chapters as appropriate.	3.2	Reject	See body of the report	No
<b>Definitions</b>							
81.147	Kāinga Ora	Riparian margin	Retain definition as notified	N/A	Accept	Agree with submitter	No
168.50	Robyn Smith	Riparian margin	Amend to:  <i>"all land which is within:</i>  <i>a. 20m of a river within an average bed width of 3m or more, or</i>  <i>b. 5m of a river within an average bed width of less than 3m, or</i>  <i>c. 20m of a natural riparian wetland."</i>  <i>Note: for the purposes of this definition, bed width shall be determined from that section of the river where it flows through the subject property and/or where it flows through adjacent land."</i>  Opposed to any amendments to the definition by way of submissions by others, or by council officer evidence and/or recommendations, that would result in the effect of the relevant provisions creating incompatibility with section 6(a) of the RMA.	3.5	Reject	See body of the report	No
FS36.16	<i>Waka Kotahi</i>		Opposes amendment. Seeks alignment with NPS-FM (referring how this has rules around works within 10m of a natural wetland)				
225.71	Forest and Bird	Riparian margin	Amend the definition to describe what a riparian margin is. For example: "the area of land adjacent to a waterbody where the land is influenced by and retains a direct relationship with the waterbody. For the purposes of this plan, it does not include the bed. Activities in these areas are managed through the use of setbacks from the bed of a waterbody as specified in relation to specific activities."  Include:	3.5	Reject	See body of the report	No

Sub. Ref.	Submitter / Further Submitter	Provision	Decision Requested	Section of this Report where Addressed	Officer's Recommendation	Officers' Reasons/Comments	Recommended Amendments to PDP?
			<ol style="list-style-type: none"> <li>1. a note that activities in the bed of a waterbody are managed under functions of the regional councils.</li> <li>2. distance limits for setbacks in relevant policies and rules.</li> </ol>				
225.57	Forest and Bird	Coastal margin	<p>Clarify the relationship between the coastal margin and coastal environment and make amendments to give effect to the NZCPS.</p> <p>Increase the coastal margin to 50m or greater and make amendments to restrict use and development that would be inconsistent with providing for landward migration of indigenous biodiversity values.</p> <p>Ensure that provisions provide for the protection of natural character throughout the coastal environment.</p>	3.5	Reject	See body of the report	No
168.49	Robyn Smith	Coastal margin	<p>Amend to:</p> <p><i>"all land within 20 metres of the line of MHWS but not within the Coastal Marine Area."</i></p>	3.5	Reject	See body of the report	No
81.46	Kāinga Ora	Coastal margin	Retain definition as notified	N/A	Accept	Agree with submitter	No

**Table B 2: Recommended responses to submissions and further submissions – PA - Public Access Chapter**

Sub. Ref.	Submitter / Further Submitter	Provision	Decision Requested	Section of this Report where Addressed	Officer's Recommendation	Officers' Reasons/Comments	Recommended Amendments to PDP?
264.53	TROTR	General	Retain as notified.	N/A	Accept	Agree with submitter	No
81.434	Kāinga Ora	General	Retain as notified	N/A	Accept	Agree with submitter	No