

## FURTHER SUBMISSION

### Proposed Te Tai o Poutini Plan

*Under Clause 8 of the First Schedule, Resource Management Act 1991*

To: Te Tai o Poutini Plan Committee  
388 Main South Road  
Paroa  
Greymouth 7805

By email: [info@tppp.nz](mailto:info@tppp.nz)

Submission by: West Coast Bulk Logistics Limited

Address for Service: Anderson Lloyd  
PO Box 13831  
Christchurch 8140

120 Medway Road  
Hanmer Springs 7334

Email: [alex.booker@al.nz](mailto:alex.booker@al.nz); [ray@wmsnz.com](mailto:ray@wmsnz.com)

- 1 West Coast Bulk Logistics Ltd (**WCBL**) is an associated company of WMS Group (HQ) Limited and WMS Land Co. Limited (**WMS**), which made a submission (S599) on the Proposed Te Tai o Poutini Plan (**TTPP**).
- 2 WCBL has an interest in TTPP that is greater than the interest that the general public has as a user of West Coast ports that are key infrastructure. WCBL is the transport arm of WMS operations and will operate West Coast's ports to store and transfer heavy mineral concentrate to its shipping operations.
- 3 This further submission on the TTPP relates to noise in the Port Zone, and vessels operating as part of port operations. WMS originally submitted in support of the Port Zone provisions. However, since the WMS further submission has been lodged with Council, WCBL:
  - (a) has received advice from its acoustic advisors that NOISE-R9 is not fit for purpose, and accordingly opposes the original submissions which support this provision; and
  - (b) has received advice there is a need to include a permitted activity rule to allow commercial vessel activities on the surface of rivers associated with port operations.
- 4 The relief sought will:
  - (a) Assist the Grey, Buller and Westland District Councils in fulfilling their statutory duties under the Resource Management Act 1991 (RMA) including the integrated management of the effects of the use, development, or protection of land;
  - (b) meet the requirements of section 32 of the RMA; and
  - (c) promote the sustainable management of natural and physical resources in accordance with Part 2 of the RMA, and in particular the efficient use of natural and physical resources.

5 WCBL wishes to be heard in support of its further submission, and will consider presenting a joint case with others presenting similar submissions.

A handwritten signature in black ink that reads "A Booker". The signature is written in a cursive style with a large, prominent initial "A".

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**Alex Booker**  
For West Coast Bulk Logistics Ltd

### Appendix 1 – further submission points

This further submission is in relation to the original submission of:	The particular parts of the original submission I/we support/oppose are:	My/our position on the original submission:	The reason for my/our support/opposition to the original submission are:	Allow or disallow the original submission (in full or in part)	Give precise details of why you wish to allow/disallow (in full or in part) to indicate the decision you want Council to make
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.544	Oppose	The use of NZS 6809: 1999 Acoustics Port Noise Management and Land Use Planning is not appropriate in the context of the West Coast's small ports, and compliance is difficult to determine. Requiring a Port Noise Management Plan is unduly onerous.	Disallow in full	Delete NOISE-R9, and add Port Zone to NOISE-R8, so that the Industrial Zone noise rules apply to Port Zoned land. Alternatively, provide a suitable alternative noise limit for the Port Zone which appropriately provides for existing and future port activities which occur at all hours of the day and does not rely on an inner control boundary.
Buller District Council (S538)	S538.339	Oppose	The use of NZS 6809: 1999 Acoustics Port Noise Management and Land Use Planning is not appropriate in the context of the West Coast's small ports, and compliance is difficult to determine as there is no inner control boundary notified in the proposed TTPP. Using an appropriate noise limit is a suitable alternative to ensure port noise is managed appropriately in the context of the receiving environment.	Disallow in full	Delete NOISE-R9, and add Port Zone to NOISE-R8, so that the Industrial Zone noise rules apply to Port Zoned land. Alternatively, provide a suitable alternative noise limit for the Port Zone which appropriately provides for existing and future port activities which occur at all hours of the day and does not rely on an inner control boundary.
Buller Conservation Group (S552) and Frida Inta (S553)	S552.125 and S553.125	Neutral	Certain areas such as ports should enable commercial vessel activities on the surface of water as a permitted activity. Note the need for consistency with Policy ASW-P3.	Neutral	Include a permitted activity rule to allow commercial vessel activities on the surface of rivers associated with port operations.
Te Runanga o Ngai Tahu, Te Runangao Ngati	S620.195	Support	Commercial activities that support the wellbeing of the community	Allow	Retain Policy ASW-P3 as notified – add permitted activity rule to give effect to this policy (as above).

Waewae, Te Runanga o Makaawhio (S620)			should be enabled in and around port areas.		
All submitters above	All submission points above	As above.	As above.	Any relief further and/or consequential to the above.	To give effect to the reasons given above.