

# Online submission

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<b>Submitter No.</b>	S414
<b>Submitter Name</b>	Koiterangi Lime Co Ltd
<b>Submitter Company/Group Name</b>	Koiterangi Lime Co Ltd
<b>Submitter is contact</b>	Yes
<b>Email</b>	<a href="mailto:stevekeenan300@gmail.com">stevekeenan300@gmail.com</a>
<b>Wish to be heard</b>	Yes
<b>Joint presentation</b>	Yes
<b>Trade competition</b>	I could not gain an advantage in trade competition through this submission.
<b>Directly affected</b>	N/A
<b>Withhold contact details?</b>	No

## Submission points

Plan section	Provision	Support/oppose	Reasons	Decision sought
Mineral Extraction Zone	MINZ - R2	Support in part	So the lime works can continue to work unheeded - We would like the Koiterangi Lime Co. Ltd quarry to be included in the Minerals Extraction Zone.	include Koiterangi Lime Co Ltd quarry to be included in the Minerals Extraction Zone

## Documents included with submission

<b>Document name</b>	Koiterangi Lime Co Ltd - submission Te Tai O Poutine Plan
<b>File</b>	<a href="#">koiterangilimeco_proposedtetaiopoutini_submission_november2022_draft.docx</a>
<b>Description</b>	Draft submission - Koiterangi Lime
<b>Document name</b>	Letter supporting Submission - Chair Koiterangi Lime works
<b>File</b>	<a href="#">submissiontetaiopoutiniplankoiterangilimeworks.pdf</a>
<b>Description</b>	support letter

## Koiterangi Lime Co Ltd Submission on Proposed Te Tai o Poutini Plan

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Our submission explicitly extends to include any other related provisions in the plan touched on in our submission and/or concerning our submission or relevant to the matters raised in our submission.

### **PART 1 – INTRODUCTION AND GENERAL PROVISIONS**

#### **INTERPRETATION**

##### **Definitions**

<b>Plan Provision</b>	<b>Support/Oppose</b>	<b>Reasons</b>	<b>Decision Sought</b>
Intensive Indoor Primary Production	Oppose in part	We believe that this definition could inadvertently capture herd homes and wintering barns (where the primary production activity principally otherwise occurs in an outdoor environment). We believe this should be amended so as to be clear that the use of herd homes and wintering barns is not included within the definition of Intensive Indoor Primary Production.	Amend as follows:  <i>Means primary production activities that principally occur within buildings and involve growing fungi, or keeping or rearing livestock (excluding calf-rearing for a specified time period) or poultry. <u>The use of herd homes and wintering barns where the primary production activity principally otherwise occurs in an outdoor environment is not included in this definition.</u></i>
New definition	-	We believe that there needs to be a clear definition for “offensive industries”.	Develop a definition for “offensive industries”.
New definition	-	We believe that there needs to be a clear definition for “hazardous facilities”.	Develop a definition for “hazardous facilities”.

**PART 2 – DISTRICT-WIDE MATTERS**

**STRATEGIC DIRECTION**

<b>Plan Provision</b>	<b>Support/Oppose</b>	<b>Reasons</b>	<b>Decision Sought</b>
AG – 01-02	Support	We support the various Strategic Objectives and Policies.	Retain as notified
CR – 01-04			
MIN – 01-06			
NENV – 01-04			

**EIT - ENERGY, INFRASTRUCTURE, AND TRANSPORT**

**TRN – Transport**

<b>Plan Provision</b>	<b>Support/Oppose</b>	<b>Reasons</b>	<b>Decision Sought</b>
TRN – 01-05	Support	We support these objectives.	Retain as notified

**HAZ - HAZARDS AND RISKS**

**CL - Contaminated Land**

<b>Plan Provision</b>	<b>Support/Oppose</b>	<b>Reasons</b>	<b>Decision Sought</b>
CL – 01	Support	We support these objectives.	Retain as notified.
CL – P1-P2	Support	We support these policies.	Retain as notified.

### HS - Hazardous Substances

<b>Plan Provision</b>	<b>Support/Oppose</b>	<b>Reasons</b>	<b>Decision Sought</b>
HS – O1	Support	We support these objectives.	Retain as notified.
HS – P1-P4	Support	We support these policies.	Retain as notified.

### NH - Natural Hazards

<b>Plan Provision</b>	<b>Support/Oppose</b>	<b>Reasons</b>	<b>Decision Sought</b>
Flood Plain Overlay	Support in part	We support that there are no land use rules for the flood plain overlay and this overlay relates only to the subdivision rules.	Retain no land use rules for the Flood Plain Overlay.
New objective	-	Similarly to NH – O4, the role that protective structures play in natural hazard mitigation needs to be recognised in the Natural Hazards Objectives.	Add a new objective: <i>To ensure the role of hazard mitigation played by protective structures and works that minimise impacts of hazards including rock walls and stopbanks is recognised and protected.</i>
NH – P12	Support	We support this policy.	Retain as notified.
NH – R1	Oppose in part	Two and five years is an insufficient length of time for reconstruction/replacement.	Amend rule so that there is a ten year period within which lawfully established buildings can be reconstructed/replaced in all overlays or delete time limit.
NH – R12	Support	We support this rule.	Retain as notified.
NH – R13	Support	We support this rule.	Retain as notified.

NH – R38	Oppose in part	Two and five years is an insufficient length of time for reconstruction/replacement and there is no activity status where compliance is not achieved.	Amend rule so that there is a ten year period within which lawfully established buildings can be reconstructed/replaced in all overlays or delete time limit and if compliance is not achieved, this should be a Discretionary Activity.
NH – R39	Support	We support this rule.	Retain as notified.
NH – R40	Oppose in part	Point two in this rule is too restrictive.	Delete point 2.
NH – R43	Support	We support this rule.	Retain as notified.

## **HCV - HISTORICAL AND CULTURAL VALUES**

### **SASM - Sites and Areas of Significance to Māori**

<b>Plan Provision</b>	<b>Support/Oppose</b>	<b>Reasons</b>	<b>Decision Sought</b>
SASM – R7	Support	We support this rule.	Retain as notified.
SASM – R11	Support	We support this rule.	Retain as notified.
SASM – R19	Support	We support this rule.	Retain as notified.

## **NATURAL ENVIRONMENTAL VALUES**

### **ECO - Ecosystems and Indigenous Biodiversity**

<b>Plan Provision</b>	<b>Support/Oppose</b>	<b>Reasons</b>	<b>Decision Sought</b>
ECO – O1-O4	Support	We support these objectives.	Retain as notified.
ECO – P1	Support in part	We support that areas of significant indigenous vegetation and fauna habitat will be identified through the resource	Amend point 2. iii. as follows:

		<p>consent process until such time as district wide identification and mapping of significant natural areas is undertaken in an appropriate and consultative way and that a formal Plan Change occurs after that time.</p> <p>We support this policy in principle. We believe that a June 2027 deadline is too ambitious to undertake the work in a way that sufficiently involves landowners.</p>	<p><i>Buller and Westland district wide assessment, identification and mapping of significant natural areas will be undertaken <del>and completed by June 2027</del>; and</i></p>
ECO – P2	Oppose in part	<p>The term “functional need” does not go far enough in recognising that some activities are required to operate in certain areas.</p>	<p>Amend point d. as follows: <i>The activity has a functional, <u>technical, operational or locational</u> need to be located in the area;</i></p>
ECO – P3	Support	<p>We support this policy.</p>	<p>Retain as notified.</p>
ECO – P6	Support in part	<p>We believe that some of the terms used in this policy need defining.</p>	<p>Define the technical ecological terms used in this policy.</p>
ECO – P7	Support in part	<p>We support that this policy provides for consideration of “the appropriateness of any biodiversity offsetting or compensation in accordance with Policy 9 to offset any residual adverse effects that remain after avoiding, remedying and mitigating measures have been applied.”</p> <p>However, there could be significant adverse effects as a result of SNA mapping if the fixed location of mineral deposits is not provided for in the policy and the temporary nature of mining is not recognised.</p>	<p>Retain point h.</p> <p>Amend to recognise that, in some instances, vegetation clearance is unavoidable (e.g. in the case of accessing mineral resource) but that these effects can be temporary due so subsequent restoration processes.</p>
ECO – P8-10	Support	<p>We support these policies.</p>	<p>Retain as notified.</p>
ECO – R1-R3	Oppose in part	<p>We believe these rules are too restrictive.</p>	<p>Amend to be more enabling of development.</p>

ECO – R4/ SUB – R7	-	Refer to SUB – R7 below.	-
ECO – R5	Oppose in part	We believe this is too restrictive.	Amend to be more enabling of development.
ECO - R6/ SUB - R9	-	Refer to SUB – R9 below.	-
ECO – R7	Oppose in part	We believe this is too restrictive.	Amend to be more enabling of development.
ECO - R8/SUB - R15	-	Refer to SUB – R15 below.	-
ECO - R9/SUB - R27	-	Refer to SUB – R27 below.	-
ECO – R10- R11	Support	We support these rules.	Retain as notified.

**NFL - Natural Features and Landscapes**

<b>Plan Provision</b>	<b>Support/Oppose</b>	<b>Reasons</b>	<b>Decision Sought</b>
NFL – R14- R15	Support	We support these rules.	Retain as notified.

**PA - Public Access**

<b>Plan Provision</b>	<b>Support/Oppose</b>	<b>Reasons</b>	<b>Decision Sought</b>
Pre-objective discussion	Support	We support the discussion in the PA chapter preceding the objective.	Retain as notified.
PA – O1	Support	We support this single objective	Retain as notified.

**SUBDIVISION**

**Subdivision**

<b>Plan Provision</b>	<b>Support/Oppose</b>	<b>Reasons</b>	<b>Decision Sought</b>
SUB – P6	Support in part	We support that this policy seeks to minimise reverse sensitivity issues.	Retain point d. as notified.
SUB – R5	Support in part	We support this rule in principle but believe some amendments are necessary.	Delete reference to “development plan” unless a better definition is supplied.  Amend wording “design and layout of allotments” to refer to 15mx15m building platform or similar specification that is more certain.  Delete point j. under Matters of Control.
SUB – R6	Oppose in part	We support this rule in principle but believe some amendments are necessary.	Amend to be less restrictive.
SUB – R7	Oppose in part	We support this rule in principle but believe some amendments are necessary.	Amend to be less restrictive.
SUB – R9	Oppose	This is too restrictive.	Delete points 2 and 3.



SUB – R13	Support	We support the provision.	Retain as notified.
SUB – R14	Oppose in part	We believe this activity should just be discretionary with no conditions.	Delete point 1. Amend “Non-complying” to “N/A” under “Activity status where compliance not achieved”.
SUB – R15/ECO – R8	Oppose	This is too restrictive.	Delete points 1 and 2. Amend “Non-complying” to “N/A” under “Activity status where compliance not achieved”.
SUB – R23	Support	We support this provision.	Retain
SUB – R25	Oppose	We do not support this provision.	Delete.
SUB – R27	Oppose	We do not support this provision.	Delete.

## GENERAL DISTRICT-WIDE MATTERS

### EW – Earthworks

<b>Plan Provision</b>	<b>Support/Oppose</b>	<b>Reasons</b>	<b>Decision Sought</b>
EW – O1	Support	We support the objective.	Retain as notified.
EW – P1-P4	Support	We support the policies.	Retain as notified.
EW – R2-3	Oppose in part	Earthworks rules are difficult to understand in the way they are currently structured. We believe these rules are too restrictive.	Amend to be more enabling of development and provide more clarity.
EW – R6-R8	Support	We support the rules.	Retain as notified.

**LIGHT – Light**

<b>Plan Provision</b>	<b>Support/Oppose</b>	<b>Reasons</b>	<b>Decision Sought</b>
LIGHT – O1	Support	We support the objective.	Retain as notified.
LIGHT – P1	Support	We support this policy.	Retain as notified.
LIGHT – P2	Support in part	We believe that this policy should extend to appropriate lighting of outdoor commercial/industrial activities.	Amend to include the enabling of artificial outdoor lighting that allows safe commercial and industrial activities.
LIGHT – R1-R4	Oppose	These rules are too complicated and restrictive.	Amend significantly to reduce complexity and be more enabling of development.

**NOISE – Noise**

<b>Plan Provision</b>	<b>Support/Oppose</b>	<b>Reasons</b>	<b>Decision Sought</b>
NOISE – O1-O3	Support	We support these objectives.	Retain as notified.
NOISE – P1, P2 and P4	Support	We support these policies.	Retain as notified.
NOISE – R5, R6 and R11	Oppose	We are opposing this due to reverse sensitivity concerns regarding our quarry operations. Timeframes for noise emissions are too restrictive.	Amend to further mitigate reverse sensitivity issues for the Koiterangi Lime Co quarry.
NOISE – R11	Oppose	Correct the error where a Mineral Extraction Zone is referred to as “MEZ”.	Correct “MEZ” error.

## **PART 3 – AREA SPECIFIC MATTERS**

### **ZONES**

#### **Rural Zones**

##### **RURZ – Rural Zones – Objectives and Policies**

<b>Plan Provision</b>	<b>Support/Oppose</b>	<b>Reasons</b>	<b>Decision Sought</b>
RURZ O1-O6	Support	We support these objectives.	Retain as notified.
RURZ P1 – P12	Support	We support these policies.	Retain as notified.
RURZ P15 – P28	Support	We support these policies.	Retain as notified.

##### **GRUZ – General Rural Zone**

<b>Plan Provision</b>	<b>Support/Oppose</b>	<b>Reasons</b>	<b>Decision Sought</b>
General Rural Zone	Oppose in part	We oppose that Section 2 SO 11712, Section 3 SO 11712, Lot 1 DP 315 and Pt Lot 2 DP 315 have been zoned GRUZ. These parcels should be zoned MINZ – Mineral Extraction Zone.	Amend so that parcels owned by Koiterangi Lime Co Ltd are zoned MINZ – Mineral Extraction Zone.
GRUZ – R1-R2	Support in part	However, pre-existing non-compliance with points 1, 2, 3 and 4 should be recognised as being acceptable for the application of the rule.	Amend so that existing non-compliance with points 1, 2, 3 and 4 of does not preclude the application of this rule.
GRUZ – R3	Support in part	However, pre-existing non-compliance with points 1, 2, 3 and 4 should be recognised as being acceptable for the application of the rule.	Amend so that existing non-compliance with points 1, 2, 3 and 4 of does not preclude the application of this rule.

GRUZ – R5	Oppose in part	We believe this rule should be simplified. Additionally, pre-existing non-compliance with points 1, 2, 3 and 4 should be recognised as being acceptable for the application of the rule.	Simplify the rule and/or amend so that existing non-compliance with points 1, 2, 3 and 4 of Rule GRUZ – R1 does not preclude the application of this rule.
GRUZ – R6	Support	We support this rule.	Retain as notified.
GRUZ – R8-R10	Support in part	We support this rule in principle. However, pre-existing non-compliance with Rule GRUZ – R1 should be recognised as being acceptable for the application of the rule.	Amend so that existing non-compliance with points 1, 2, 3 and 4 of Rule GRUZ – R1 does not preclude the application of this rule.
GRUZ – R11	Oppose in part	Not all prospecting or exploration is required to have a permit from NZPAM e.g. some minerals are privately owned. Amend accordingly.  We believe the rule is also too restrictive.	Amend point 1 as follows: <i>This is authorised under a prospecting or exploration permit from NZPAM <u>where legally required</u>;</i>  Delete point 3 or extend the timeframe until a period after cessation of mining activity.
GRUZ – R12	Oppose in part	We support this rule in principle but believe that Transport Performance Standards and rules relating to light need to be amended before this rule is acceptable.  We believe the rule is also too restrictive.	Improve the Transport Performance Standards and rules relating to light that connect to this rule.  Amend to be more enabling of development.
GRUZ – R13	Support in part	We support this rule but note the minor error.	Retain as notified with minor timing error being corrected (i.e. 12pm).
GRUZ – R16-R17	Support in part	We support this rule in principle. However, pre-existing non-compliance with Rule GRUZ – R1 should be recognised as being acceptable for the application of the rule.	Amend so that existing non-compliance with points 1, 2, 3 and 4 of Rule GRUZ – R1 does not preclude the application of this rule.

GRUZ – R18	Support in principle	We support in principle.	Retain as notified.
GRUZ – R20-R22	Support in part	We support this rule in principle. However, pre-existing non-compliance with Rule GRUZ – R1 should be recognised as being acceptable for the application of the rule.	Amend so that existing non-compliance with points 1, 2, 3 and 4 of Rule GRUZ – R1 does not preclude the application of this rule.
GRUZ – R24	Support in part	We support this rule in principle. However, pre-existing non-compliance with Rule GRUZ – R1 should be recognised as being acceptable for the application of the rule.	Amend so that existing non-compliance with points 1, 2, 3 and 4 of Rule GRUZ – R1 does not preclude the application of this rule.
GRUZ – R25-29	Support	We support these rules.	Retain as notified.
GRUZ – R30	Oppose in part	We believe this rule is too restrictive and unclear.	Amend with more clearly defined terms. Delete points 1 and 2. Amend “Non-complying” to “N/A” under “Activity status where compliance not achieved”.
GRUZ – R31	Oppose in part	We believe this rule is too restrictive.	Delete point 1. Amend “Non-complying” to “N/A” under “Activity status where compliance not achieved”.
GRUZ – R32-R33	Support	We support these rules.	Retain as notified.
GRUZ – R34	Oppose	This rule is unnecessarily restrictive.	Delete.

**MINZ – Mineral Extraction Zone**

<b>Plan Provision</b>	<b>Support/Oppose</b>	<b>Reasons</b>	<b>Decision Sought</b>
Mineral Extraction Zone Overview	Support in part	We support the overview in part though note that authorisation regarding some effects of activities in the proposed MINZ derived from existing use rights.	Add a 4 <sup>th</sup> point to include “existing use rights”.
Mineral Extraction Zone	Oppose in part	We oppose that Section 2 SO 11712, Section 3 SO 11712, Lot 1 DP 315 and Pt Lot 2 DP 315 have been zoned GRUZ. These parcels should be zoned MINZ – Mineral Extraction Zone.  Adjoining land is zoned MINZ – Mineral Extraction Zone. Amending the zoning as submitted is also appropriate.	Amend so that parcels owned by Koiterangi Lime Co Ltd are zoned MINZ – Mineral Extraction Zone.
MINZ – O1-O2	Support	We support these objectives.	Retain as notified.
MINZ – P1-P8	Support	We support these policies.	Retain as notified.
MINZ – R1	Support in part	We support the principle of this rule. However, point two is unnecessarily restrictive.	Delete point 2.
MINZ – R2	Support	We support this rule in principle.	Retain as notified.
MINZ – R3	Support in part	We support the principle of this rule. However, point two is unnecessarily restrictive.  Existing non-compliance with the points noted should be recognised as being acceptable.	Delete point 2.  Amend so that existing non-compliance with points 2 and 3 does not preclude the application of this rule.
MINZ – R5	Support	We support this rule.	Retain as notified.
MINZ – R6	Support	We support this rule.	Retain as notified.

MINZ – R7	Support	We support this rule.	Retain as notified.
MINZ – R9	Support	We support this rule.	Retain as notified.
MINZ – R10	Oppose	We oppose this rule.	Delete.

## **PART 4 – APPENDICES**

### **SCHEDULES**

#### **Schedule Four: Significant Natural Areas**

<b>Plan Provision</b>	<b>Support/Oppose</b>	<b>Reasons</b>	<b>Decision Sought</b>
Schedule Four: Significant Natural Areas	Support in part	<p>We support that areas of significant indigenous vegetation and fauna habitat will be identified through the resource consent process until such time as district wide identification and mapping of significant natural areas is undertaken in an appropriate and consultative way and that a formal Plan Change occurs after that time.</p> <p>We support this policy in principle. We believe that a June 2027 deadline is too ambitious to undertake the work in a way that sufficiently involves landowners.</p>	Retain Schedule as notified

#### **Schedule Five: Outstanding Natural Landscapes**

<b>Plan Provision</b>	<b>Support/Oppose</b>	<b>Reasons</b>	<b>Decision Sought</b>
Schedule Five: Outstanding	Support in part	We support that parcels owned by Koiterangi Lime Co Ltd are not included in the schedule.	Parcels owned by Koiterangi Lime Co Ltd to remain excluded.

Natural Landscapes			
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**Schedule Six: Outstanding Natural Features**

<b>Plan Provision</b>	<b>Support/Oppose</b>	<b>Reasons</b>	<b>Decision Sought</b>
Schedule Six: Outstanding Natural Features	Support in part	We support that parcels owned by Koiterangi Lime Co Ltd are not included in the schedule.	Parcels owned by Koiterangi Lime Co Ltd to remain excluded.

**Schedule Nine: Lawfully Established Mineral Extraction and Processing Areas**

<b>Plan Provision</b>	<b>Support/Oppose</b>	<b>Reasons</b>	<b>Decision Sought</b>
Schedule Nine: Lawfully Established Mineral Extraction and Processing Areas	Oppose in part	We believe that our limestone quarry at Kowhitirangi should be listed in the schedule.	Amend Schedule to include Koiterangi Lime Co Ltd Limestone Quarry.



## APPENDICES

### Appendix One: Transport Performance Standards

<b>Plan Provision</b>	<b>Support/Oppose</b>	<b>Reasons for the Submission</b>	<b>Decision Sought</b>
Transport Performance Standards	Oppose in part	These unnecessarily restrictive and complex. There also appear to be potential errors in the table. The qualifiers are not consistent, and this makes the table difficult to use.	Amend to be less onerous, more consistent and correct errors.

### Appendix Seven: Mineral Extraction Management Plan Requirements

<b>Plan Provision</b>	<b>Support/Oppose</b>	<b>Reasons</b>	<b>Decision Sought</b>
Appendix Seven: Mineral Extraction Management Plan Requirements	Support	We support the plan requirements.	Retain as notified.

# Koiterangi Lime Co. Ltd

Camelback Road, RD 1, Hokitika

(03) 755 7897

9<sup>th</sup> November 2022

Te Tai o Poutini Plan Committee

c/- [info@tpp.nz](mailto:info@tpp.nz)

West Coast Regional Council

P.O. Box 66

Greymouth 7840



To the Te Tai o Poutini Plan Committee,

## **Submission from Koiterangi Lime Co Limited on the Proposed Te Tai o Poutini Plan**

Please find attached our submissions on the Proposed Te Tai o Poutini Plan.

Our submission explicitly extends to include any other related provisions in the plan touched on in our submission and/or concerning our submission or relevant to the matters raised in our submission.

*We wish to speak to our submission. We would consider presenting a joint case if others make a similar submission.*

We support recognising the importance of farming, quarrying and mining to the West Coast. We support specifically providing for mineral extraction in zones across the three West Coast districts including within rural, open space and specific mineral extraction zones. We support the Mineral Extraction Zone remaining in the Plan (though being amended to include further parcels as noted in this submission) and including future activities to help ensure economic opportunities on the West Coast into the future.

Section 2 SO 11712, Section 3 SO 11712, Lot 1 DP 315 and Pt Lot 2 DP 315 are owned by Koiterangi Lime Co Limited.

Our limestone quarry provides an essential product for the local agricultural industry. Quarrying and crushing limestone in Kowhitirangi minimises freight costs and carbon emissions associated with purchasing and transporting lime from out of district and region.

The quarry provides local employment directly and indirectly. The quarry supports the resilience and well-being of the local community and economy. Thank you for considering our submission.

Yours faithfully

A handwritten signature in black ink, appearing to read 'S. Keenan'.

Stephen Keenan

Chair - Koiterangi Lime Co. Ltd