

SUBMISSION ON PROPOSED TE TAI O POUTINI PLAN (TTPP)

1.0 SUBMITTER DETAILS

Submitter Name: Alistair Cameron

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2.0 SUBMISSION DETAILS

The following submission relates to the proposed MINZ – Mineral Extraction Zones in the Te Tai o Poutini Plan.

We do wish to speak to this submission.

We will not gain any advantage in trade competition through this submission.

If others make a similar submission, we would consider presenting a joint case with them at a hearing.

3.0 INTRODUCTION

1. Alistair Cameron owns land at Woodstock-Rimu Road, Ruatapu, being Lot 1 DP 2400, which is included in the MINZ – Mineral Extraction Zone under the proposed Te Tai o Poutini Plan. Mr Cameron holds Minerals Permit 60369 over part of Lot 1 DP 2400. **Appendix 1** contains plans showing the location of Lot 1 DP 2400 and MP 60369.
2. Lot 1 DP 2400 is part of Alistair Cameron's wider landholdings in the Woodstock area, comprising approximately 220ha.
3. Mr Cameron is also an experienced land developer who has completed a number of subdivisions in the Westland District.

4.0 SUBMISSION

4. I support the TTPP recognising the importance of mining to the West Coast by specifically providing for mineral extraction in zones across the three West Coast districts including within Rural, Open Space and specific Mineral Extraction zones.
5. I support the inclusion of the specific Mineral Extraction Strategic Objectives MIN – 01 to MIN – 06 in the TTPP, clearly setting out at a high level that the three West Coast District Councils support the mining industry.
6. I support the Mineral Extraction Zone remaining in the Plan and including future activities to help ensure economic opportunities on the West Coast into the future.
7. I support the provision for subdivision in the Mineral Extraction Zone under Rule SUB - R14 as a discretionary activity.
8. I object to the requirement for iwi approval prior to any mineral extraction activity, as required by Rule SASM – R7(3).
9. The West Coast needs industry and employment. The COVID-19 pandemic has highlighted that districts cannot survive on tourism alone; the West Coast needs existing and new industry to provide ongoing and future employment opportunities.
10. Mineral extraction projects will deliver new economic opportunities, which will flow on to other businesses including construction, sciences, engineering, transport, mechanical and the hospitality, retail and accommodation sectors.
11. Schools and community groups are supported by a thriving industry which generates significant employment and high salaries. This enables ongoing support of community initiatives and charities at all levels; ranging from rescue helicopter sponsorship by a major mining company through to individual donations from families with disposable income.
12. Although I support the overall approach of the TTPP supporting the mining industry on the Coast, I consider that the rules for the MINZ – Mineral Extraction Zone need adjustment to be fit for purpose in the long term. The TTPP needs to consider how land in the zone should be managed after mining is finished.
13. Policy MINZ - P3 states:

To ensure that after mineral extraction, all mine sites in the MINZ - Mineral Extraction Zone are rehabilitated to best practice environmental standards and to provide for future use and activities appropriate to the area.

14. No consideration appears to have been given to appropriate land uses after mining has been completed in the Mineral Extraction Zone. There is no provision in the rules for “*future use and activities*” other than “*Conservation, Recreation and Research Activities*” (MINZ – R4) or “*Grazing of Animals*” (MINZ – R5). All other activities, including rural industries or rural-residential development, have non-complying status (MINZ – R9 and MINZ – R10).
15. The rules for land use in the Mineral Extraction Zone are too restrictive, and do not provide for long term development of land that has been mined.
16. Policy MINZ - P7 states:

Manage conflicts between mineral extraction activities and other land uses by ensuring that:

- (a) Performance standards to minimise impacts on the amenity, rural character and natural values of adjacent areas are met; and*
- (b) Activities that are incompatible with the effects of mineral extraction and ancillary activities are not established in the MINZ - Mineral Extraction Zone.*

17. I support the restriction on incompatible activities being established before and during mining. However, in accordance with Policy MINZ – P7(b), the rules for land use in the Mineral Extraction Zone should allow activities that are not incompatible with the effects of mineral extraction and ancillary activities. For example, rural industries could be established in the zone without triggering reverse sensitivity effects.
18. I submit that a new Permitted Activity rule should be included in the TTPP allowing the establishment of rural industries (defined in the TTPP as “*an industry or business undertaken in a rural environment that directly supports, services, or is dependent on primary production*”) in the Mineral Extraction Zone.
19. Proposed wording for this rule, as follows, is similar to that for ancillary mining activities (MINZ – R3):

Proposed Rule MINZ – Rx: Rural Industries

Activity Status Permitted

Where:

- (a) Maximum building height above ground level is 10m;*
- (b) Buildings are setback a minimum of 10m from the road boundary and 10m from internal boundaries;*
- (c) There is a maximum of 30 heavy vehicle movements per day (excluding internal movements within the mineral extraction site);*
- (d) There shall be no offensive or objectionable dust nuisance at or beyond the property boundary as a result of the activity;*
- (e) Noise meets the Permitted Activity Standards in Rule NOISE - R7; and*
- (f) Light and glare meet the Permitted Activity standards in Rule LIGHT - R4.*

20. I also submit that provision should be made within the Mineral Extraction Zone rules to allow appropriate land uses to establish in the zone after mining is completed.
21. I consider that the rules for the GRUZ General Rural Zone would generally be appropriate for the Mineral Extraction Zone once mining is finished. This would allow for the establishment of a wider range of activities on mined and rehabilitated land, without requiring unnecessary land use consents.
22. This long-term approach could be cross-referenced in the Mineral Extraction Zone rules by including a new set of rules, for example:

Proposed Rule MINZ – Rx: Activities after Mining Works Completed

Activity Status Permitted

Where:

1. *All mineral extraction works have been completed on a site, and the land fully rehabilitated in accordance with the mine closure plan and rehabilitation programme in the Mineral Extraction Management Plan required by Rule MINZ – R2;*
2. *The Permitted Activity rules for the GRUZ – General Rural Zone shall apply as if the site were located in that zone, except that:*
 - (a) *No sensitive activities shall be located within [xx] metres of land in the Mineral Extraction Zone that has not been mined.*

Proposed Rule MINZ – Rx: Activities after Mining Works Completed not meeting Permitted Activity Standards

Activity Status Discretionary

23. In conjunction with this new proposed rule, the title for Rule MINZ – R9 (non-complying status) would also need to be amended to read “MINZ - R9 Residential Activities **not meeting Permitted Activity Standard MINZ – Rx**” i.e., referring back to the new rule proposed in (22) above but retaining the non-complying status for residential activity until mining has been completed.
24. Rule SASM – R7(3) states that for mineral extraction in the Pounamu Management Area overlay to be carried out as a permitted activity:
- Written approval is provided by the relevant Poutini Ngāi Tahu rūnanga - Te Rūnanga o Ngāti Waewae or Te Rūnanga o Makaawhio, that the activity can occur within the Pounamu and/or Aotea overlay(s) and the written confirmation shall be provided to the relevant district council at least 10 working days prior to the activity commencing.*
25. The Advice Note to this rule then refers to the “*Pounamu Vesting Act*” and reiterates that all pounamu is owned by Te Rūnanga o Ngāti Tahu.

26. As the pounamu itself is already protected by law, I object to the requirement for written approval prior to mineral extraction works. This rule gives iwi *de facto* control over mining across a significant part of the West Coast, as mining could not proceed without iwi approval.
27. This rule will create additional administration for iwi and result in potential delays for mining and is not acceptable.
28. If the purpose of Rule SASM – R7(3) is to ensure that iwi is aware of mining activities so that they can monitor the possible extraction of pounamu, this could be achieved without requiring written approval. Rule SASM – R7(3) could simply be amended to require notification to iwi prior to mining, rather than requiring approval from iwi.

5.0 CONCLUSION

29. In summary, Alistair Cameron:
 - Supports the Mineral Extraction Zone and the strategic objectives in the TTPP which recognise the importance of mining on the West Coast.
 - Supports the restriction on incompatible activities being established before and during mining, including residential activity.
 - Supports the provision for subdivision in the Mineral Extraction Zone as a discretionary activity.
 - Submits that Rural Industries should be permitted within the Mineral Extraction Zone.
 - Submits that the TTPP does not cater for long-term use of land within the Mineral Extraction Zone, and seeks that the rules for the General Rural Zone should generally apply after mining is completed.
 - Objects to the requirement for written approval from iwi for any mineral extraction works in the Pounamu Management Area overlay.

Signed:

On behalf of Alistair Cameron



PAULINE HADFIELD
DAVIS OGILVIE & PARTNERS LTD
Senior Planner, Assoc.NZPI

Enc:

Appendix 1 Site plans

APPENDIX 1

Site Plans

Māori Purpose Zone

Māori Purpose Zone

Arthurstown

Kaniere

Kaniere

MEDU31

Mineral Extraction Zone

Mineral Extraction Zone

Hokitika River

Kaniere River

Rural Residential

Insolvent Trk

Arthurstown Rd

Papanui St

Settlement Centre

Woodstock-Rimu Rd

Camp St

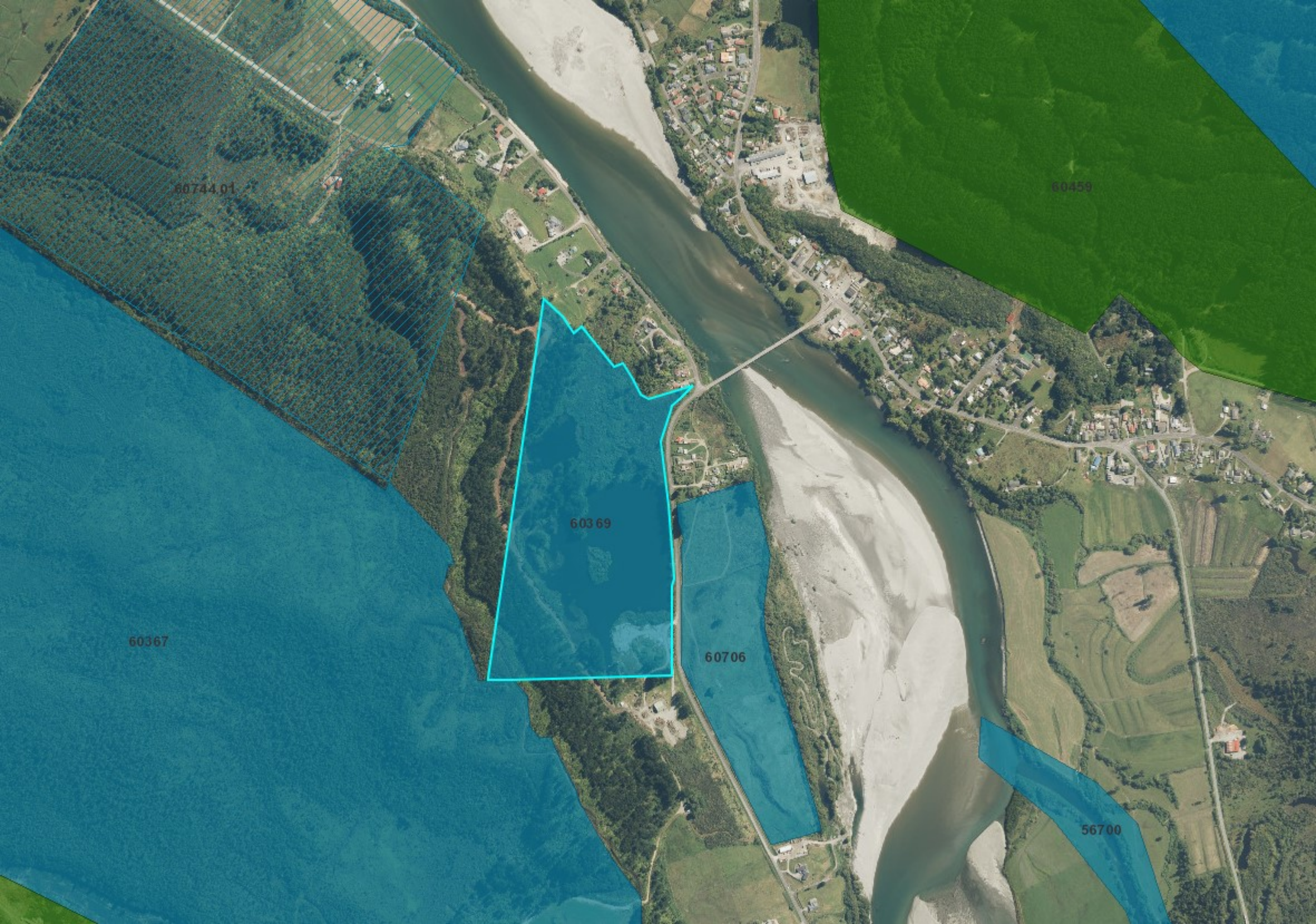
St Albans St

Kaniere Rd

Hau Hau Rd

Kaniere-Kowhitirangi Rd





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