

11 November 2022

Te Tai o Poutini Plan – Proposed Plan
info@tppp.nz

Dear Sir/Madam,

Submission on the Te Tai o Poutini Plan (TTPP)

Organisation: *Westreef Services Limited*

Please find attached a submission from *Westreef Services Limited (WSL)* on the Proposed Te Tai o Poutini Plan (TTPP).

We would not gain an advantage in trade competition through this submission.

Westreef Services Limited is directly affected by an effect of the subject matter of the submission that adversely affects the environment and does not relate to trade competition or the effects of trade competition.

Westreef Services Limited does wish to be heard in support of its submissions.

If others make similar submissions, we would consider presenting a joint case.

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Mark Lile
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The specific provisions that my submission is related to are set out in this submission below.

The Buller District Council own the M^cPaddens Pit land, comprising approximately 8 hectares and located on the corner of Alma Road and Buller Road. This site contains the Westreef Quarry and the Westport Wastewater Treatment Plant. This land is legally described within Records of Title 111109, NL8B/740 and 511485. To the north of the M^cPaddens Pit site is the 27.5553-hectares legally described within ROT 695049 as Lot 2 Deposited Plan 486827. This adjoining land has recently been purchased from Mrs Joan Hamilton.

Planning Maps / Zoning

Planning Map 150 of the proposed TTPP locates the site within the '*General Rural Zone*', with part also the subject of Designation BDC33. The north-eastern portion of Lot 2 DP486827 is also within the Coastal Alert Area, Coastal Environment Area, and being within a site and area of significance to Māori.

1. Given the long established and authorised uses of the site, and significance to the region, it is considered that the proposed zoning within the TTPP may not be the most appropriate. The proposed TTPP includes a Mineral Extraction Zone (including Schedule Nine which identifies 'Lawfully Established Mineral Extraction and Processing Areas'). This Zone / Schedule is also considered to be a suitable zoning for M^cPaddens pit and adjoining area (to the west and north) to provide for the long-term needs of the district and region, as operated by Westreef Services Limited. Such a Zone (or suitable alternative) would better provide for the efficient use and further development of the site, over and above the proposed General Rural Zone.

Schedule Nine

2. **Schedule Nine** identifies 'Lawfully Established Mineral Extraction and Processing Areas'. It is considered that M^cPaddens Pit on Alma Road is one such Mineral Extracting and Processing Area that should also be identified in this Schedule.

General Rural Zone

3. The importance of mineral extraction is also identified in **RURZ** and **GRUZ** of the TTPP. This is supported.
4. **RURZ – 01**. WSL supports this objective as it seeks to provide a range of activities, uses and developments. As a consequence, WSL also supports policies **RURZ – P6, P7 and P8**.
5. **RURZ – 05**. WSL supports this objective as it supports mineral extraction in the rural environment. As a consequence, WSL also supports the associated policies contained within RURZ P18 to P25.
6. The activity of Mineral Extraction is provided for as a permitted activity within **GRUZ – R12**. This rule is supported in part. It is requested that the following changes be made to this rule to better provide for this activity, and in interests of Westreef Services Limited:
 - **R12.1**. This standard provided for mineral extraction of less than 20,000m³ within a 12-month period. The rule however also refers to disturbance. This is a significantly different

activity than mineral extraction (from the site). Disturbance activity occurs through activities such as stripping topsoil and dealing with overburden. As such, it is submitted that the rule should only refer to 'extraction of material from the site' and with the disturbance activity deleted.

- **R12.2.** This standard requires progressive rehabilitation aligned with no more than 3ha of disturbance at any one time. This rule is supported in part, but with the rule referring to an area of 5ha rather than 3ha.
- **Clause a.iii.** This rule relates to mineral extraction not occurring within riparian margins, yet the margin is not defined. A definition or specific setback needs to be included for the benefit of clear administration and interpretation. It is submitted that riparian/stream margin be defined as 10m from the top of the bank.
- **Clause a.vi.** This standard provides for mineral extraction if that activity is not within 250m of a residential building in the listed zones. It is submitted that 250m is an excessive setback for quarries such as M^cPaddens Pit, with topography and vegetation also providing a significant buffer already. It is considered that this standard should be reduced to 150m.
- **Clause e.** This standard restricts heavy vehicle movements to 10 per day and light vehicle movements to 30 per day as a permitted activity. WSL supports this standard if this provides for 10 heavy vehicles to visit and depart the site each day, and likewise 30 light vehicles.

Please contact me if you have any queries.

Yours sincerely,



Mark Lile

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