

Submission on Proposed Te Tai o Poutini Plan

Under Clause 6 of the First Schedule, Resource Management Act 1991

By email: info@tppp.nz

Submitter: CMP Kokiri Limited

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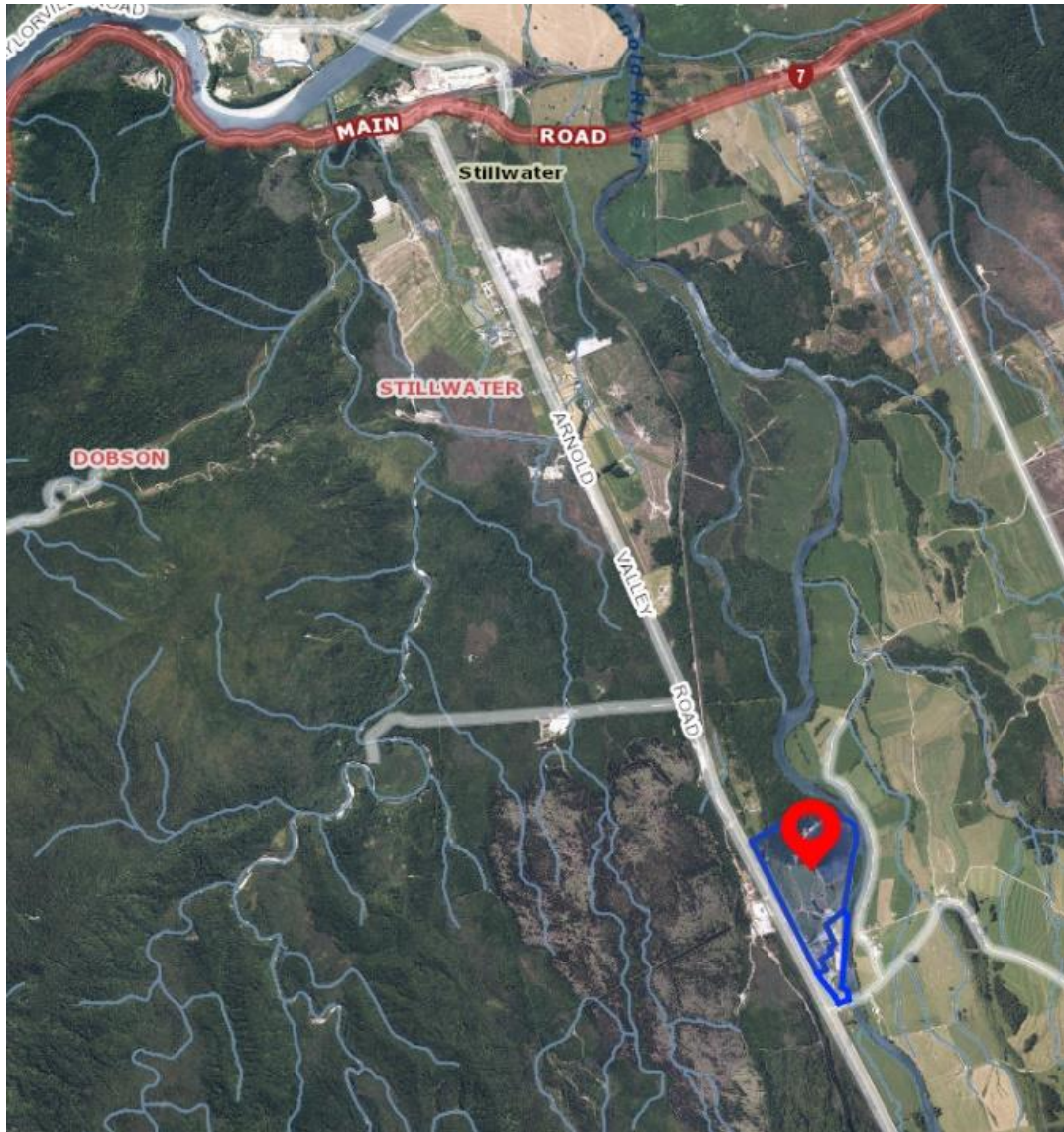
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- 1 This submission is on the proposed Te Tai o Poutini Plan (the **TTPP**).
- 2 CMP Kokiri Ltd could not gain an advantage in trade competition through this submission.
- 3 This submission relates to the TTPP in its entirety, including but not limited to the following sections:
 - (a) Planning maps and zoning; and
 - (b) Zones – Industrial and Rural.

Background

- 4 CMP Kokiri Limited, trading as ANZCO Foods Kokiri Limited (**CMP Kokiri**) owns and operates a meat processing plant located on RD1 Dobson-Arnold Valley Road, Arnold Valley 7872 (the **Plant Site**).
- 5 The Plant Site, comprised of approximately 33.17 hectares,¹ is legally described as Lots 1 and 2, DP 2134. It is located approximately 5km south of Stillwater, and is bordered by the Arnold River and Arnold Valley Road (as shown in blue in the map below).

¹ ANZCO Kokiri also owns rural land adjacent to the Plant Site.



- 6 The Plant site is long established, having been operated as a meat processing factory in this location for approximately 40 years. There is significant investment in the Plant Site, including existing buildings which have a site coverage of approximately 8,500m².
- 7 CMP Kokiri is an important employer within the community, currently employing 180 staff. The Plant Site also provides important support to the rural community, processing 75,000 cattle per year, sourced from farms across the South Island.

Submission

- 8 The Plant Site is zoned Rural under the operative Plan, and is proposed to be zoned General Rural under the TTPP.
- 9 This submission seeks that the Plant Site be rezoned to General Industrial Zone. The Plant Site already has industrial character, with the scale of built form and activity exceeding that anticipated by zone standards for the General Rural zone.
- 10 The proposed General Rural zoning:
 - (a) fails to recognise and provide for the ongoing use and development of the Site as an established industrial activity which services the region;
 - (b) will not give effect to the West Coast Regional Policy Statement 2020 and the National Policy Statement on Urban Development 2020;
 - (c) will not promote the efficient use and development of resources; and
 - (d) will otherwise be inconsistent with the purpose and principles in Part 2 of the RMA.
- 11 General Industrial zoning will better reflect the established and intended use of the Plant Site. The zoning will also:
 - (a) assist the Council in carrying out its 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) give effect to the National Policy Statement on Urban Development 2020, providing plan enabled business land;
 - (c) give effect to the West Coast Regional Policy Statement 2020, providing for economic development and activity, while also seeking to protect the environment;
 - (d) meet the requirements of section 32 of the RMA, by promoting the efficient use and development of resources;
 - (e) promote the sustainable management of natural and physical resources in accordance with Part 2 of the RMA.

Relief sought

- 12 CMP Kokiri seeks the following decision from the West Coast Regional Council:
 - (a) As primary relief, that the Plant Site be rezoned General Industrial;
 - (b) As alternative relief, rezoning of the Plant Site to an alternative zone (for example, Light Industrial) that provides for continued meat processing activities on the Site;
 - (c) Such other relief to give effect to this submission, including alternative, further or consequential amendments to objectives, policies, rules and definitions of the TTPP to address the matters raised by CMP Kokiri.

13 CMP Kokiri wishes to be heard in support of its submission.

Date: 25 November 2022

A handwritten signature in black ink, appearing to read 'S Eveleigh', with a long horizontal flourish extending to the right.

CMP Kokiri Limited

Signed by its duly authorised agents

Anderson Lloyd

Per: **Sarah Eveleigh / Sarah Schulte**

25 November 2022

Te Tai o Poutini Plan Team

By email: info@tpp.nz

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70 Gloucester Street
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PO Box 13831
Christchurch 8140
New Zealand

Dear Sir/Madam

al.nz

Submission on proposed Te Tai o Poutini Plan

- 1 We act for CMP Kokiri Limited (**CMP Kokiri**).
- 2 Please find **attached** submission on behalf of CMP Kokiri on the proposed Te Tai o Poutini Plan (**TTPP**).
- 3 The period for lodging a submission on the TTPP ended on Friday 11 November 2022. Accordingly, CMP Kokiri seeks a waiver of its failure to comply with the time limit for submissions, under section 37 of the Resource Management Act 1991 (**RMA**).
- 4 Section 37A of the RMA sets out the matters that the Council must take into account when exercising its discretion under section 37 of the RMA:
 - (a) the interests of any person who, in its opinion, may be directly affected by the waiver; and
 - (b) the interests of the community in achieving adequate assessment of the effects of a plan; and
 - (c) the local authority's duty under section 21 of the RMA to avoid unreasonable delay.
- 5 The submission is sought to be lodged only ten working days later than the close of the submission period. It is submitted that the interests of other persons would not be unduly prejudiced by the late lodgement of this submission.
- 6 CMP Kokiri's submission relates to the zoning of land that it owns, to recognise and provide for the continued operation of its meat processing plant on that site. That plant is a significant employer and provides processing services that support the surrounding rural community. It is submitted that CMP Kokiri's input will be valuable and that the overall process will benefit from its contribution.
- 7 Given the limited delay in filing the submission and the number of submissions filed, we anticipate that the late filing will not cause any administrative issue and the submission can be receipted and summarised together with the on-time submissions. For these reasons it is submitted that the granting of the waiver will not cause any unreasonable delay.
- 8 The summary of submissions on the TTPP is yet to be notified. Other parties will have the same length of time to review and consider CMP Kokiri's submission as they will have for on-time submissions, once the summary of submissions is notified. It is submitted that there is no prejudice to any other party arising from the late filing.

9 CMP Kokiri respectfully requests that the waiver be granted and the attached submission accepted.

Yours faithfully
Anderson Lloyd

A handwritten signature in black ink, appearing to read 'SEveleigh', with a stylized flourish at the end.

Sarah Eveleigh

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