



24 May 2024

Te Tai O Poutini Plan Hearing Panel
PO Box 66
Greymouth 7840

By email to: info@tpp.nz

Dear Sir/Madam

Proposed Te Tai O Poutini Plan – Feedback on Minute 22 Strategic Directions

We have read the s42A Author Response to Minute 16 – Strategic Directions, prepared by Lois Easton and dated 5 April 2024.

Primacy of Strategic Objectives

We agree that the strategic objectives should not have primacy over other objectives in the TTPP and consider that the overview should be amended to ensure this is clearly stated.

The statement below is proposed to be deleted from the overview and each of the strategic objective chapters, purportedly to clarify that the strategic objectives do not have hierarchy over the location- or topic-specific provisions in the Plan:

For the purposes of preparing, changing, interpreting, and implementing Te Tai o Poutini Plan, all other objectives and policies in all other chapters of this Plan are to be read and achieved in a manner consistent with these Strategic Directions.

However, the Strategic Directions Overview states that the strategic directions “reflect those factors which are considered to be key to achieving the overall vision for the pattern and integration of land use within the Westland, Grey and Buller District” and that they express the “overarching direction” for the Plan.

Given the importance of the strategic objectives in achieving a vision for land use, it seems they should have a role somewhere between having primacy over, and being entirely equal to, other provisions. We suggest the statement is amended to reflect the need to consider whether other provisions are consistent with Strategic Directions. Possible wording could be:

For the purposes of preparing, changing, interpreting, and implementing Te Tai o Poutini Plan, all other objectives and policies in all other chapters of this Plan are to be considered for their consistency ~~be read and achieved in a manner consistent~~ with these Strategic Directions.



Proposed Redrafting of Strategic Objectives

We have concerns that proposed Economic Development objectives do not specifically recognise and provide for the use and development of mineral resources. Proposed Objective ED-O1 is very broad and effectively supports the status quo rather than any industry growth. Although mineral extraction is mentioned as one of the three industry sectors, Terra Firma considers that the high level nature of ED-O1 is at odds with the specific recognition warranted and required by this industry. At the other end of the spectrum, proposed ED-O2 has a narrow focus on reverse sensitivity which, while important, is only one aspect of the use and development of mineral resources.

It is our view that MIN-O1 is also necessary to provide the appropriate recognition, in which case we would argue that the mineral extraction provisions should remain in a separate Strategic Direction and not be bundled into one-size-fits-all Economic Development provisions.

Terra Firma supported the original wording of MIN-O1 but is happy with the amendments suggested by the legal submission of Bathurst Resources Ltd and BT Mining Ltd dated 24 November 2023.

Yours sincerely

A handwritten signature in blue ink that reads 'LC Smith'.

Lucy Smith
DIRECTOR