

30 May 2024

Te Tai O Poutini Plan Hearing Panel  
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Dear Commissioners

### **Proposed Te Tai O Poutini Plan – Commercial and Industrial Zones Hearing**

The Section 42A Report – Commercial and Industrial Zones makes recommendations on four submission points lodged by Terra Firma Mining Ltd (Terra Firma). I have provided responses to the recommendations below.

#### **Submissions S537.001 and S537.034 (General Industrial Zone)**

Terra Firma supports the recommendation to retain the proposed General Industrial Zone over its property at 19 Elizabeth St, Reefton described as Section 1 SO 91166 and to extend this zone to apply to its second parcel (Section 3 SO 12150).

#### **Submission 537.022 (INZ-O1)**

Terra Firma originally supported INZ-O1 as it refers to providing for the “efficient and effective operation and development of industrial activities” in the Industrial Zones. The clear wording was considered to be helpful at an objective level.

The s42A report author recommends replacing this phrase with less specific wording, to “recognise that industrial activities contribute to economic and social wellbeing and are enabled” in the Industrial Zones. In my view, this broader phrase appropriately recognises the benefits of industrial activities and is sufficiently important to be included as a new standalone, overarching objective (as sought by Westland Milk Products (S63.008)).

I consider that a form of the original INZ-O1 is still necessary as it gives direction as to how these activities will be enabled, i.e. providing for their efficient and effective operation and development. The rewording below could be appropriate:

*To provide for the efficient and effective operation and development of industrial activities in the INZ - Industrial Zones in a manner that maintains a standard of amenity appropriate to these areas and ~~does not compromise the amenity of adjoining zones~~ areas.*

**Submission 537.023 (INZ-P6)**

Terra Firma sought that INZ-P6 be retained. The s42A report author recommends amendments to address the submission by Silver Fern Farms (S441.050). These amendments refer to 'maintaining amenity values' of zones rather than ensuring an 'acceptable' level of amenity within the zones. The revised wording is:

*Provide for a wide range of industrial and compatible activities within the INZ – Industrial Zones, while maintaining the amenity values of any adjacent RESZ – Residential Zone, OSRZ – Open Space and Recreation Zone, MUZ – Mixed Use Zone or SETZ – Settlement Zone ~~ensuring an acceptable level of environmental quality and amenity within the zones.~~*

As a result of the amendments, the focus of INZ-P6 changes from the environmental quality and amenity within the zones, to the amenity values of adjacent zones. This seems to duplicate the intent of recommended amendments to INZ-P8, which are as follows:

*~~Impose performance standards on~~ Avoid, remedy or mitigate adverse effects of development and land use in the INZ - Industrial Zones to maintain that ~~protects~~ the amenity values of the commercial, residential and rural areas surrounding the INZ - Industrial Zones.*

I suggest that wording of INZ-P6 proposed by Silver Fern Farms is appropriate to address the amenity within Industrial Zones (see below), leaving the amended INZ-P8 (above) to cover amenity values of adjoining zones.

*Provide for a wide range of industrial and compatible activities, and corresponding environmental quality and amenity, within the INZ - Industrial Zones, ~~while ensuring an acceptable level of environmental quality and amenity within the zones.~~*

I confirm that Terra Firma will not be filing evidence on the Commercial and Industrial Zones Hearing, and does not wish to be heard at the hearing. However, I am available to answer any questions from the Hearing Panel either in writing or via video conference if required.

Yours sincerely



Lucy Smith  
DIRECTOR