

**IN THE MATTER OF** the Resource Management Act 1991

**AND**

**IN THE MATTER OF** Hearings in Relation to the  
Proposed Te Tai o Poutini Plan:  
Rural and Settlement Zones

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**STATEMENT OF EVIDENCE OF PAULINE HADFIELD**

**ON BEHALF OF INTERNATIONAL PANEL & LUMBER – FS98**

**Dated: 1 July 2024**

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## **INTRODUCTION**

1. My name is Pauline Hadfield. I am based in Nelson and work as a senior planner at Davis Ogilvie and Partners Limited, which is a multi-disciplinary survey, engineering and planning consulting company with offices in Christchurch, Nelson and Greymouth. Davis Ogilvie work in the resource management space across the West Coast.
2. I have over twenty years resource management experience. Most of this has been West Coast-based work including preparation of a wide range of subdivision, and land use consent applications to all three District Councils in the region. I also undertake external consent processing work on behalf of the Buller District Council and more recently, the Grey District Council.
3. I hold a Diploma in Environmental Management from the Open Polytechnic of New Zealand and I am an Associate member of the New Zealand Planning Institute. I completed the NZPI's Expert Witness – Presenting Planning Evidence course in 2017.
4. I confirm that all statements made are my professional opinion and that I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023. The evidence I will present is within my area of expertise, and I have not knowingly omitted facts or information that might alter or detract from the opinions I express.

## **SCOPE OF EVIDENCE**

5. My evidence is presented on behalf of International Panel and Lumber (West Coast) Limited (IPL) (Further Submitter No. 98).
6. I request the opportunity to provide additional evidence, if necessary, at the hearing.
7. My evidence will discuss the background to the further submission that was made on behalf of IPL, and respond to the Reporting Officer's comments in the s42A Officers Report.
8. Mr Robert Dumelow, General Manager of IPL (FS98), will attend the hearing to answer any questions relating to the requested amendment to zoning of IPL's land.

## **BACKGROUND TO FURTHER SUBMISSION**

9. IPL contacted Davis Ogilvie in May 2023 after they noticed that the zoning of part of their land at Gladstone, containing the staff car park for the IPL

factory, had been proposed for re-zoning under the notified Te Tai o Poutini Plan (TTPP).

10. The car park site (Part Lot 2 DP 1460) is held in the same title as the main factory site (Lot 1 DP 1460). A copy of Record of Title WS1A/184 is attached as Appendix 1.
11. Under the operative Grey District Plan, the IPL factory site, including the car park, was included in the Industrial Zone. Under the TTPP, the car park has been re-zoned as Rural Lifestyle. IPL requested that Davis Ogilvie make a submission to request a reversal of this re-zoning.
12. As submissions had closed, I approached the TTPP committee for advice. Appendix 2 contains email correspondence from May 2023, where Ms Rachel Vaughan recommended that we raise the matter via a further submission, and suggested a number of submissions that we could refer to.
13. Utilising Ms Vaughan's approach, Further Submission 98 was made on 29 June 2023.

#### **SECTION 42A REPORT**

14. IPL's further submission is referred to in paragraph 405 of Ms Easton's s42A report. Ms Easton supports the re-zoning requested, to reflect the existing use, but notes that she is unclear whether there is scope to do this.
15. Clause 16(2) of Schedule 1 in the Resource Management Act 1991 states: *"A local authority may make an amendment, without using the process in this schedule, to its proposed policy statement or plan to alter any information, where such an alteration is of minor effect, or may correct any minor errors."*
16. Appendix 3 contains email correspondence dated 29 May 2024, which acknowledges the potential for FS98 to be "out of scope". However, this correspondence importantly acknowledges, in the second bullet point on page 2, that the zoning of IPL's car park as Rural Lifestyle appears to be erroneous.
17. In my opinion, Clause 16(2) provides for this zoning to be corrected, regardless of the technical status of IPL's further submission.
18. The TTPP Committee have acknowledged that the notified zoning of the IPL car park as Rural Lifestyle appears to have been an error, meeting the second part of Clause 16(2).

19. The level of effect arising from the requested zoning; that is, General Industrial, is less than minor in my opinion, for the following reasons:
- The site is currently zoned Industrial under the operative District Plan. Re-zoning as General Industrial will effectively retain the *status quo*.
  - The land use (car parking) is ancillary to the main factory site and is an existing activity.
  - The site is held in the same title as the main factory and cannot be disposed of separately without subdivision approval by the Grey District Council.
  - Any further industrial development on Part Lot 2 DP 1460 (including any expansion of the car park under Rule GIZ-R6) would need to comply with Rule GIZ-R1. Among other matters, GIS-R1 includes screening requirements and building setbacks from Settlement zoning.
  - The Hokitika Industrial railway line provides an additional 20-metre buffer between IPL's site and the Settlement zoned land west of the railway line.

### **CONCLUSION**

20. The owners consider that the notified zoning creates land that has no economic value to IPL or the West Coast. If IPL expands its factory, it is likely that this land would be used for stock storage and dispatch. The zoning to Rural Lifestyle precludes this potential benefit to IPL and the West Coast economy.
21. In conclusion, I request that the Hearings Panel utilise the provision under Clause 16(2) Schedule 1 of the Resource Management Act 1991 to zone Part Lot 2 DP 1460, containing IPL's staff car park, as General Industrial.



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**PAULINE HADFIELD**

01 July 2024





**RECORD OF TITLE  
UNDER LAND TRANSFER ACT 2017  
FREEHOLD  
Search Copy**



  
R.W. Muir  
Registrar-General  
of Land

**Identifier** **WS1A/184** **Part-Cancelled**

**Land Registration District** **Westland**

**Date Issued** 15 February 1963

**Prior References**

WS53/144

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**Estate** Fee Simple  
**Area** 5.3755 hectares more or less  
**Legal Description** Lot 1-2 Deposited Plan 1460  
**Registered Owners**  
International Panel and Lumber (West Coast) Limited

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**Interests**

Saving and excepting all minerals within the meaning of the Land Act 1924 on or under the land and reserving always to Her Majesty the Queen and all persons lawfully entitled to work the said minerals a right of ingress egress and regress over the said land and a right to sink shafts under or through the said land and to take watercourses over the same

Subject to Section 315 Land Act 1924

Subject to Section 8 Coal Mines Amendment Act 1950

40774 Gazette Notice proclaiming part of the within land (3.9 perches) as road - 22.9.1971 at 11.25 am

088544.3 Mortgage to Bank of New Zealand - 27.5.1991 at 11.00 am

Appurtenant to Lot 1 DP 1460 herein is a right to convey water created by Easement Instrument 6845308.1 - 2.5.2006 at 9:00 am

8140476.3 Partial surrender of the right to convey water created by Easement Instrument 6845308.1 as to part marked D, E, F and M on DP 413301 - 12.5.2009 at 2:42 pm

8140476.22 COVENANT UNDER SECTION 240 RESOURCE MANAGEMENT ACT 1991 (ALSO AFFECTS 449587) - 12.5.2009 at 2:42 pm

Land Covenant in Easement Instrument 8180047.1 - 2.6.2009 at 11:38 am

Subject to a right (in gross) to convey electricity over part marked A over Part Lot 2 DP 1460 in favour of Westpower Limited created by Easement Instrument 9070789.1 - 18.5.2012 at 8:38 am



**APPENDIX 2**

Email – R Vaughan, 23 May 2023

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## Pauline Hadfield

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**From:** TTPP Info <info@tppp.nz>  
**Sent:** Tuesday, 23 May 2023 4:47 PM  
**To:** Pauline Hadfield; TTPP Info  
**Cc:** Alyce Heine  
**Subject:** RE: [#DO43566] IPL Zoning, Gladstone

Hi again,

Yes, add it to as many submission points as you think. I think that is a good point, while zoning doesn't affect current operations, the current zoning is material. I've had a similar situation with a sawmill in another District Plan. They ended up with no protection for operations and expansion, so it is necessary to raise it.

Kind regards,  
Rachel

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**From:** Pauline Hadfield <pauline@do.nz>  
**Sent:** Tuesday, May 23, 2023 3:12 PM  
**To:** TTPP Info <info@tppp.nz>  
**Cc:** Alyce Heine <alyce@do.nz>  
**Subject:** RE: [#DO43566] IPL Zoning, Gladstone

This email is from an external sender. Please be careful with any links or attachments.

Hi again Rachel

Giving this some thought. Do you think a further submission along the lines of: "we support submission xxxx and also request that Part Lot 2 DP 1460 revert to General Industrial zoning as per the operative District Plan" could work? It's a tenuous link at best, particularly given the car park isn't proposed for the General Industrial zone.

I could also, as a backup position, support the Coll et al submissions on RLZ – R24; these ask for industrial activities (for which the definition includes ancillary activities) to be discretionary in the Rural Lifestyle zone rather than non-complying. Though the existing car park should be covered by existing use rights under s10 RMA anyhow.

Any more ideas on how I could strengthen the submission? Thanks for sending me looking at the zone/district wide rules though, that's been really helpful. There's nothing on parking in the RLZ rules, and I don't think I can link it to anything under Transport.

Thanks  
Pauline

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**From:** Pauline Hadfield  
**Sent:** Tuesday, May 23, 2023 1:57 PM  
**To:** TTPP Info <[info@tppp.nz](mailto:info@tppp.nz)>  
**Cc:** Robert Dumelow <[Rob@iplply.nz](mailto:Rob@iplply.nz)>; Mike Robbins <[mike.robbins@do.nz](mailto:mike.robbins@do.nz)>  
**Subject:** RE: [#DO43566] IPL Zoning, Gladstone

Thanks so much!  
I hadn't thought of coming at it from that angle.  
Will look at those submissions and see what I can come up with.

Thanks

**PAULINE HADFIELD** / Senior Planner / [pauline@do.nz](mailto:pauline@do.nz) / Assoc.NZPI

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**From:** TTPP Info <[info@tpp.nz](mailto:info@tpp.nz)>  
**Sent:** Tuesday, May 23, 2023 9:38 AM  
**To:** Pauline Hadfield <[pauline@do.nz](mailto:pauline@do.nz)>; TTPP Info <[info@tpp.nz](mailto:info@tpp.nz)>  
**Cc:** Robert Dumelow <[Rob@iplply.nz](mailto:Rob@iplply.nz)>; Mike Robbins <[mike.robbins@do.nz](mailto:mike.robbins@do.nz)>  
**Subject:** RE: [#DO43566] IPL Zoning, Gladstone

Hi Pauline

Thanks for your email. I had a look, and you could add it to submission point S574.371, 190.805, 567.428, 558.371, 566.371. This rule specifically deals with carparking and existing use.

I hope this is helpful, there are no general submissions on industrial zoning for the Grey area unfortunately.

Kind regards,  
Rachel

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**From:** Pauline Hadfield <[pauline@do.nz](mailto:pauline@do.nz)>  
**Sent:** Tuesday, May 23, 2023 9:00 AM  
**To:** TTPP Info <[info@tpp.nz](mailto:info@tpp.nz)>  
**Cc:** Robert Dumelow <[Rob@iplply.nz](mailto:Rob@iplply.nz)>; Mike Robbins <[mike.robbins@do.nz](mailto:mike.robbins@do.nz)>  
**Subject:** [#DO43566] IPL Zoning, Gladstone

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Good morning

We have been approached by IPL, who only recently realised that the zoning of part of their land at Gladstone has changed under the proposed TTPP. They asked us to put in a submission.

I have explained that submissions have closed and that the opportunity for any further submission at this stage is limited to comment on an existing submission. I've reviewed the Summary of Submissions (Planning Maps & Overlays) as the most likely place to find any relevant submissions, and I've also checked the TTPP and GDC submissions. Unfortunately I have found nothing on which I can base a further submission.

Is there any way that you, as the Committee, are able to add their request for their carpark to revert to the original zoning at this late stage? Or have they "missed the boat"?

The site is Part Lot 2 DP 1460, located at Osmond Road, Gladstone, as highlighted below. The main IPL site (Lot 1 DP 1460) has been proposed for General Industrial Zoning, but the car park site has been changed to Rural Lifestyle. Both of these sites are presently zoned Industrial under the Operative District Plan, and IPL would prefer that situation to remain.



Is there any option available to IPL and/or can you help with this?

Regards

**PAULINE HADFIELD** / Senior Planner / [pauline@do.nz](mailto:pauline@do.nz) / Assoc.NZPI

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**APPENDIX 3**

Email – L Easton, 29 May 2024

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## Pauline Hadfield

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**From:** Doug Bray <doug.bray@wrc.govt.nz>  
**Sent:** Wednesday, 29 May 2024 11:04 AM  
**To:** Pauline Hadfield  
**Cc:** TTPP Info  
**Subject:** FW: [#DO43408] COMMERCIAL AND INDUSTRIAL ZONE QUERIES FOLLOW UP

### Doug Bray

Senior Policy Planner | West Coast Regional Council

✉ doug.bray@wrc.govt.nz | 📞 +64 3 768 0466 ext. 9109 | 📱 +64272416771



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**From:** Doug Bray <doug.bray@wrc.govt.nz>  
**Sent:** Wednesday, May 29, 2024 10:58 AM  
**Cc:** Michelle Conland <michelle.conland@wrc.govt.nz>; Lois Easton <Lois.Easton@wrc.govt.nz>; Chu Zhao <chu.zhao@wrc.govt.nz>  
**Subject:** COMMERCIAL AND INDUSTRIAL ZONE QUERIES FOLLOW UP

Kia ora Pauline

Further to your queries yesterday - re: why two particular matters were not addressed in the Section 42A Report for the Commercial and Industrial Zones Topic.

#### T Croft Ltd S460.003 - Rezone Caretakers Residence at 139 Arnold valley Road to Light Industrial Zone (c.f. General Rural Rone)

This particular submission point is being dealt with in the Rural Zone Report and Hearing. The Hearings for that topic are scheduled for 29-30 July 2024 in Westport and 1-2 August 2024 in Greymouth. The Section 42A Reports (One for Settlement Zone, the other for other Rural Zones) are due to be circulated in early July 2024. Typically requests for Rezoning get assigned to *one* Report/Topic - typically the report /topic for the zoning that the Draft Plan *proposes*, c.f. the ones for the revised zoning *sought* by submitters. Otherwise there would simply be too many instances of things needing to be addressed twice or more over. The majority of rezoning requests have been to rezone from a Rural Zone (General or Lifestyle) to something else - so rezonings will be a key matter to cover in that topic.

#### Further Submission 98: International Panel and Lumber (West Coast) Ltd - Brief Mention in Paragraph 671

This one is a little more complex - because it is a *Further* Submission. Basically the Further Submitter included the same commentary relative to further submissions made in respect of relief sought by the original submitter under *both* the Rural and Industrial Zones. And the original submission itself did *not* seek any rezoning. OK, in a strictly technical sense, a further submission can support or oppose relief sought by a submitter, but not *add* something like rezoning (which this one appears to

have done in the reasons for further submitting - when the original submission itself was about a particular Rule, not a given zoning). HOWEVER:




- The author of the Rural Zones Section 42A Report has agreed to add commentary in that Report addressing Further Submissions 98.005, 98/006 and 98.007; while
- The Carpark concerned would appear to have been *erroneously* zoned Rural Lifestyle in this instance - so yes, the Rural Report will recommend the General Industrial rezoning as sought by IPL.

So essentially both matters will be addressed, but in the Rural Zones topic.

Cheers

## Doug Bray

Senior Policy Planner | West Coast Regional Council

 [doug.bray@wrc.govt.nz](mailto:doug.bray@wrc.govt.nz) |  +64 3 768 0466 ext. 9109 |  +64272416771



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