

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

VERBAL STATEMENT OF EVIDENCE OF PAULINE HADFIELD

ON BEHALF OF INTERNATIONAL PANEL & LUMBER – FS98

Date: 1 August 2024

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. 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.

BACKGROUND TO FURTHER SUBMISSION

7. 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. IPL requested that Davis Ogilvie make a submission to request a reversal of this re-zoning. However, this was well after submissions closed on the Plan.
8. Under the operative Grey District Plan all of the IPL factory site, including the car park, was included in the Industrial Zone. Under the TTPP, the car park site, Part Lot 2 DP 1460, has been re-zoned as Rural Lifestyle.
9. As submissions had closed, I approached the TTPP committee for advice. My written evidence included copies of 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.
10. Utilising Ms Vaughan's approach, Further Submission 98 was lodged on 29 June 2023.
11. An aerial photo showing the zoning and occupation of the IPL site is attached to this evidence. It is clear from this aerial photography that Part Lot 2 DP 1460 is used for car parking purposes, and that there is a logical connection with the factory across the road.
12. Furthermore, the car park site is held in the same title as the main factory site (Lot 1 DP 1460). In my opinion, the underlying Industrial zoning for this property should have carried through to the notified Plan because the land use is clearly connected with and ancillary to the main IPL factory.
13. IPL's further submission is referred to in paragraph 405 of Ms Easton's s42A report, after discussion on submissions for Rule RLZ-R24. Ms Easton states:

"I note that International Panel and Lumber (West Coast) Ltd (FS98.005, FS98.006, FS98.007) has supported these submissions because it has a property and carpark zoned Rural Lifestyle Zone that would be affected by this rule located at Osmond Road, Gladstone. I would support the rezoning of this property as General Industrial Zone, to reflect the existing use, however I am unclear whether there is scope to do this."

14. I was unable to find any submissions which provided a clear link for a further submission relating to zoning of IPL's car park, and I was aware at the time of the tenuous link between the original submissions and the further submission on behalf of IPL. I agree with Ms Easton's comments about the scope of the re-zoning sought in IPL's submission.
15. However, Clause 16(2) of Schedule 1 in the Resource Management Act 1991 may give some relief. This clause 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. The question for the consideration of the Hearings Panel is whether the re-zoning of this part of IPL's title, which contains car parking ancillary to the main industrial factory site, can be considered to meet the tests in Clause 16.
17. The TTPP Committee have acknowledged that the notified zoning of the IPL car park as Rural Lifestyle appears to have been an error. My written evidence included a copy of email correspondence dated 29 May 2024 acknowledging this. The question here is whether this can be considered a "minor error", thereby meeting the second part of Clause 16(2).
18. The second test in Clause 16 is the level of effect arising from the alteration to the notified zoning. Are the effects of re-zoning from the notified Rural Lifestyle to General Industrial zoning minor?
19. In my opinion, the effects arising from re-zoning Part Lot 2 DP 1460 would be less than minor, for the following reasons:
 - i. The site is currently zoned Industrial under the operative District Plan. Re-zoning as General Industrial will effectively retain the *status quo*.
 - ii. The land use (car parking) is ancillary to the main factory site and is existing and ongoing. I note here that the National Planning Standards

definition for Industrial Activity, as stated in the TTPP, includes “*any ancillary activity to the industrial activity*”.

- iii. 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.
- iv. If the re-zoning is approved, any further industrial development on Part Lot 2 DP 1460 (including any expansion of the car park under Rule GIZ-R6) would still need to comply with Rule GIZ-R1. Among other matters, GIZ-R1 includes screening requirements and building setbacks from Settlement zoning.
- v. The land is located adjacent to the Hokitika Industrial railway line, which 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; and means that any further development on IPL’s land would be likely to require resource consent, incurring additional costs that would not be needed if the land was zoned correctly.
21. In conclusion, I request that the Hearings Panel consider whether there is scope within the further submission, or within Clause 16(2) Schedule 1 of the Resource Management Act 1991, to amend the notified zoning of Part Lot 2 DP 1460 containing IPL’s staff car park as General Industrial; and if so, to re-zone the site accordingly.
22. Thank you for your time. I am happy to answer any questions to the best of my ability.



PAULINE HADFIELD

01 August 2024

**International Panel & Lumber factory:
Lot 1 DP 1460**

Part Lot 2 DP 1460

Trickles Rd

Osmond Rd Hammer Ice

Ogive Rd

