

**IN THE ENVIRONMENT COURT
AT CHRISTCHURCH
I TE KOTI TAIAO O AOTEAROA
KI ŌTAUTAHI**

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of an appeal pursuant to clause 14(1) of Schedule 1 of the Act in relation to decisions on the proposed Te Tai o Poutini Plan

BETWEEN GORDON DOUGLAS BRADLEY

Appellant

AND BULLER DISTRICT COUNCIL

GREY DISTRICT COUNCIL

WESTLAND DISTRICT COUNCIL

Respondents

NOTICE OF APPEAL

**NOTICE OF APPEAL TO ENVIRONMENT COURT AGAINST
DECISION ON THE PROPOSED TE TAI POUTINI PLAN**

Clause 14(1) of Schedule 1, Resource Management Act 1991

To: The Registrar

Environment Court

CHRISTCHURCH

1. Gordon Douglas Bradley (**the Appellant**) appeals against part of a decision of the Te Tai Poutini Plan Committee on behalf of Buller District Council, Grey District Council and Westland District Council (**Respondents**) on the proposed Te Tai Poutini Plan (**the Proposed Plan**).
2. The Appellant made a further submission on the Proposed Plan (further submitter number FS145).
3. The Appellant is not a trade competitor for the purpose of section 308D of the Resource Management Act 1991 (**RMA**).
4. The Appellant received notice of the Respondents' decision on 10 October 2025.

The decision (or parts of the decision) that the Appellant is appealing:

5. The specific provisions of the Proposed Plan that the Appellant is appealing are set out in the table attached as Appendix 1 to this appeal notice. The general reasons for the appeal are set out below.

The reasons for the appeal are as follows:

6. The general reasons for the appeal are that:

- a) The Appellant's further submission (FS145) opposing the rezoning of the CMP Kokiri site from General Rural Zone to Light Industrial Zone was not considered or addressed in the decision;
 - b) The CMP Kokiri meat works is a rural support industry with a functional relationship to primary production and is not incongruous with placement within the General Rural Zone. The site has operated successfully under rural zoning for approximately 40 years, demonstrating that industrial zoning is not necessary to provide for its continued operation;
 - c) The LIZ zone rules provide inadequate protection for adjacent General Rural Zone properties, as building setbacks, screening, and landscaping requirements apply only at boundaries with Residential and Settlement Zone neighbours, not General Rural Zone neighbours;
 - d) The rezoning enables higher noise levels and light spill at the site boundary, without adequate assessment of effects on neighbouring rural properties.
7. Without limiting the generality of the above, further specific grounds of appeal are set out in Appendix 1.

The Appellant seeks the following relief:

8. The relief sought is set out with respect to each provision in the table attached as Appendix 1. The primary relief sought is that the CMP Kokiri site (Lots 1 and 2 DP2134, Arnold Valley Road, Dobson) be retained in the General Rural Zone, as sought in the Appellant's further submission.
9. In the alternative, if the Court determines that Light Industrial Zoning is appropriate, the Appellant seeks that the LIZ rules be amended to require building setbacks, screening, and landscaping at boundaries with General Rural Zone properties equivalent to those required at boundaries with Residential and Settlement Zone properties.
10. The Appellant also seeks such consequential amendments or related relief as may be necessary to give effect to the concerns described in this notice of appeal.
11. The Appellant would be prepared to be involved in negotiations and mediations with the Respondents and other parties if this path was chosen as a way to address issues raised in appeals.

ATTACHMENTS

12. The following documents are attached to this Notice:
 - (a) Appendix 1: table of relief sought by provision with reasons provided.
 - (b) Appendix 2: a copy of the Appellant's further submission (FS145).

Dated 8 December 2025

Signature:



Gordon Douglas Bradley

Address for Service of Appellant:

99 Blair Road
RD1 Dobson 7872

Email: bradleyfarming@gmail.com

Advice to recipients of copy of notice of appeal

How to become a party to proceedings

You may be a party to the proceedings if you made a submission or a further submission on the matter of this appeal.

To become a party to the appeal, you must, -

- Within 15 working days after the period for lodging a notice of appeal ends, lodge a notice of your wish to be a party to the proceedings (in form 33), with the Environment Court and serve copies of your notice on the relevant local authority and the appellant; and
- Within 20 working days after the period for lodging a notice of appeal ends, serve copies of your notice on all other parties.

Your right to be a party to the proceedings in the Court may be limited by the trade competition provisions in section 274(1) and Part 11A of the Resource Management Act 1991.

You may apply to the Environment Court under section 281 of the Resource Management Act 1991 for a waiver of the above timing or service requirements (see form 38).

How to obtain copies of documents relating to appeal

The copy of this notice served on you does not attach a copy of the appellant's submission and the decision appealed. These documents may be obtained, on request, from the appellant.

Advice

If you have any questions about this notice, contact the Environment Court in Auckland, Wellington or Christchurch.

Appendix 1: Table of relief sought by provision with reasons provided

Provision Appealed	Reasons for Appeal	Relief Sought
<p>Planning Maps <i>Lots 1 and 2 DP2134, Arnold Valley Road, Dobson</i></p>	<p>The Appellant made further submission FS145 opposing submission S611.001 from CMP Kokiri Limited, which sought to rezone the CMP site from General Rural Zone to General Industrial Zone.</p> <p>The Appellant's further submission:</p> <ul style="list-style-type: none"> • Explicitly opposed the rezoning • Identified the Appellant as a neighbouring farmer with interest greater than the general public • Sought to "Disallow" the industrial rezoning • Raised concerns about implications of industrial zoning inside the rural zone <p>The Decision discusses submission S611.001. However, FS145 is not mentioned in the Decision Report.</p> <p>The CMP Kokiri meat works is a rural support industry with a functional relationship to primary production in the surrounding area. The site has operated under rural zoning for approximately 40 years. As stated in the Appellant's further submission, this demonstrates there is "little effect to the need to change the zoning of the site." Industrial zoning is not necessary to provide for the continued operation of an established rural industry.</p>	<p>Primary: Retain General Rural Zone for the CMP Kokiri site (Lots 1 and 2 DP2134).</p> <p>Alternative: If LIZ is retained, amend LIZ rules to provide equivalent amenity protections for GRUZ neighbours as for RESZ/SETZ neighbours.</p>
<p>LIZ Zone Rules (Alternative Relief)</p>		

Provision Appealed	Reasons for Appeal	Relief Sought
Rule LIZ-R1	<p>Rule LIZ-R1 sets performance standards for industrial activities including building setbacks, building envelopes, and landscaping requirements.</p> <p>However, these amenity controls apply only at boundaries with RESZ (Residential Zones) and SETZ (Settlement Zones), not at boundaries with GRUZ (General Rural Zone).</p> <p>Specifically:</p> <ul style="list-style-type: none"> • Building setback (5m) - applies to RESZ/SETZ only (LIZ-R1.3.iii) • Recession plane/building envelope - applies to RESZ/SETZ only (LIZ-R1.5) • Landscaping at boundary - applies to RESZ/SETZ only (LIZ-R1.4) <p>This means industrial buildings and activities can occur immediately at the boundary with rural properties without any setback, screening, or landscaping</p>	Amend LIZ-R1 to apply equivalent setback, building envelope, and landscaping requirements at boundaries with GRUZ as currently apply at boundaries with RESZ and SETZ.
Rule NOISE-R5	<p>The noise rules permit different noise levels depending on the receiving zone.</p> <p>Under NOISE-R5.2, noise received at GRUZ boundaries is limited to 55dB LAeq (daytime), 50dB (evening), 45dB (night).</p> <p>Under NOISE-R5.3, noise received at LIZ boundaries is limited to 60dB LAeq (daytime), 55dB (evening), 50dB (night).</p> <p>The rezoning enables the CMP site to generate higher noise levels at its boundary than would be permitted under rural zoning, with consequential effects on the Appellant's amenity.</p>	That noise generated from the LIZ-zoned CMP site be required to meet GRUZ receiving environment standards (55/50/45 dB LAeq) at the boundary with the Appellant's property.
Rule LIGHT-R2	<p>Light spill limits differ significantly between zones.</p> <p>Activities in LIZ zones are permitted to produce up to 10 lux at the site boundary at night (LIGHT-R2).</p> <p>Activities in GRUZ are limited to 1 lux at the notional boundary. The rezoning therefore enables a ten-fold increase in permitted light spill affecting the Appellant's property.</p>	That light spill from the LIZ-zoned CMP site be required to meet GRUZ receiving environment standards (1 lux) at the boundary with the Appellant's property.

Appendix 2: Appellant's Further Submission (FS145)

Appendix 3: Persons to be served with a copy of this notice

The Appellant's further submission (FS145) related to submission S611.001 from CMP Kokiri Limited.

Name	Address for Service
CMP Kokiri Limited	Sarah Eveleigh / Sarah Schulte, Anderson Lloyd, PO Box 13831, Christchurch 8141, sarah.eveleigh@al.nz , sarah.schulte@al.nz