

49. Smelter

Submission No. and Point / Submitter Name/	Plan Provision	Summary of Submission	Decision Requested
SECTION 2.43 – ISSUES, OBJECTIVES AND POLICIES			
	Introduction		
71.28 NZAS Ltd	Introduction	Support in part. The submitter considers the introduction should refer to the wharf at Tiwai Point as it is considered an integral part of their operation	Amend Introduction as follows: “The smelter is sited at Tiwai Point within the coastal environment. It has a functional need of this site because of the need for <u>Tiwai wharf as part of its operations</u> and a location adjacent to a port (for the import of raw materials) and within close proximity to port facilities at Bluff for export of product.”
	2.43.1 Issues		
71.29 NZAS Ltd	2.43.1	Support. The submitter supports the recognition of the need to protect the smelter’s operational requirements	Retain Issue 1
	2.43.2 Objectives		
71.30 NZAS Ltd	Objective 1	Support. The submitter supports the recognition of the economic importance of the smelter	Retain Objective 1
71.31 NZAS Ltd	Objective 2	Oppose. The submitter considers that it is unclear what particular “amenity values” are meant to be identified, maintained and enhanced, and how these amenity values are related to the smelter.	Delete Objective 2
	2.43.3 Policies		
71.32 NZAS Ltd	3 Policy 1 Smelter Zone	Support.	Retain Policy 1
71.33 NZAS Ltd	Policy 2 Noise	Oppose in part. The submitter considers the reference to “freedom from noise” is too rigid, as there is an expectation for some noise in residential areas, as detailed in the residential policies and rules	Amend Policy 2 as follows: “To provide for the opportunity to generate levels of noise in keeping with the operation of the aluminium smelter, whilst also recognising that residential areas in Bluff are entitled to <u>protection from unreasonable or excessive noise as part of their residential amenity in terms of freedom from noise.</u> ”
71.34 NZAS Ltd	Policy 3 Odour	Support in part. The submitter supports the policy but suggests a minor wording change	Amend Policy 3 as follows: “To accept that odour emissions associated with aluminium smelting activities whilst also ensuring the

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			absence of nuisance from objectionable odour.”
71.35 NZAS Ltd	Policy 4 Glare	Oppose in part. The submitter considers that avoidance of glare may not always be possible given the size and nature of the operation. The submitter also considers that reference to effects on the transportation networks is ambiguous as it is unclear what transportation network is likely to be affected	Amend Policy 4 as follows: “To avoid, <u>remedy or mitigate</u> nuisance from glare. Explanation: The aluminium smelter is characterised by very large buildings and structures which have the potential to create glare. Significant glare from large structures can affect transportation networks and could affect those with distant views of the smelter.”
71.36 NZAS Ltd	Policy 5 Electrical interference	Oppose. The submitter considers that this policy is unjustified and unnecessary. The submitter considers that given the isolation of the operation from other activities electrical interference is unlikely to be an issue	Delete Policy 5
71.37 NZAS Ltd	Policy 6 Lightspill	Oppose in part. The submitter seeks a minor amendment, noting that they require lighting 24 hours a day, but understand that it is important to manage the effects of this on residential activities	Amend Policy 6 as follows: “To manage the effects of <u>inappropriate</u> lightspill from the aluminium smelting activities and associated operations on nearby residential areas.”
71.38 NZAS Ltd	Policy 7 Wind, Signage, height ...	Support, but notes that this demonstrates the inappropriateness of the broadness of Objective 2	Retain Policy 7
71.39 NZAS Ltd	Policy 8 On-site servicing capacity	Support. In particular the submitter supports acknowledgement that other activities may impact on the smelter’s water supply, stormwater and foul water disposal	Retain Policy 8
71.40 NZAS Ltd	Policy 9 Hazardous substances	Support. The submitter supports the acknowledgement of the operational needs to store, use and transport hazardous substances on site	Retain Policy 9
71.41 NZAS Ltd	Policy 10 Rehabilitation and re-use of the site	Oppose. The submitter does not consider the policy achieves its goal of encouraging appropriate adaption, reuse and remediation of the site as it is currently worded. The submitter opposes the requirement that buildings be “well-maintained” on the grounds that it believes the maintenance plan is a matter for its own determination and consideration. The submitter considers the term “demolition and replacement” is confusing as it implies that if a building is demolished then it should be replaced, when this may not be the best option. The submitter also notes that it is not clear how demolition is to be promoted.	Delete Policy 10

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		The submitter considers that the policy is open to misinterpretation as it is not clear whether it is intended to apply during the life of the smelter or if part of it is only to apply once the smelter is decommissioned	
71.42 NZAS Ltd	Policy 11 Demolition or removal activities	Support. The submitter supports the policy's recognition of the temporary effects that demolition activities can have on amenity values	Retain Policy 11
71.43 NZAS Ltd	2.43.3 Policy 12 Connectivity	Support in part. The submitter supports the policy but seeks an amendment for clarity	NZAS seeks that Policy 12 be amended as follows: "To promote connectivity between the Smelter Zone, the seaport at Bluff and the smelter's own wharf at Tiwai, and <u>the connections provided with wider Invercargill district via the roads servicing the site.</u> "
	2.43.4 Methods of Implementation		
71.44 NZAS Ltd	Methods 1-2, 4, 6-7	Support	Retain Methods 1,2, 4, 6 and 7
71.45 NZAS Ltd	Method 3 and 5	<p>Oppose. The submitter considers there is no justification for referring to amenity values in relation to the smelter zone and for any requirement that they be identified.</p> <p>The submitter considers that it is its place to determine the layout of the site and that this may not accord with the amenity values that exist elsewhere in the district.</p> <p>The submitter questions what amenity values are intended to be covered by these methods"</p>	Delete Methods 3 and 5
71.46 NZAS Ltd	Method 8	Oppose in part. The submitter considers that this method is too vague in terms of who is to be consulted, what the consultation will be about.	Amend Method 8 as follows: "Consult with <u>stakeholders who may be affected by the operation of the smelter, for example</u> landowners and occupiers, iwi, Central Government organisations, internal Council departments and local community and business groups."
SECTION 3.41 - RULES			
24.69 South Port NZ Ltd	Rule 3.41.1	Oppose in part. The submitter considers that Seaport Activities should also be included in the list of activities that are permitted within the	Include Seaport Activities as a permitted activity within the Smelter Zone.

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		Smelter Zone. The Port provides a dedicated wharf and causeway servicing the Smelter and therefore such activities should be appropriately recognised as being permitted within this zone.	
71.62 NZAS Ltd	3.41.1	Support in part. The submitter would like the list of permitted activities expanded for clarity. The submitter also seeks that business activities be permitted in the Smelter Zone to enable other activities to co-locate on the site.	Amend 3.41.1 as follows: “ The following are permitted activities in the Smelter Zone: (A) Agriculture other than plantation forestry. (B) Aluminium smelting <u>and ancillary activities.</u> (C) <u>Business activities, including administration activities, training activities and professional and personal services.</u> ”
71.63 NZAS Ltd	3.41.2	Oppose in part. The submitter considers that there are provisions within the Plan that are not set out within the Zone section, that will apply within the zone, and seeks amendment to recognise this.	Amend 3.41.2 as follows: “Non-complying Activities: The following are non-complying activities in the Smelter Zone: (A) Any other activity not listed as permitted, <u>controlled, restricted discretionary or discretionary.</u> ”