

# Te Tai o Poutini Plan Proposed Plan

# Submission form

Te Tai o Poutini Plan Proposed Plan

Have your say!

We need your feedback. We want to hear from you on the proposed Te Tai o Poutini Plan. What do you support and what would you like changed? And why? It is just as important to understand what you like in the Proposed Plan as what you don't. Understanding everyone's perspectives is essential for developing a balanced plan.

## Your details:

First name: Jackie Surname: Mathers

Are you submitting as an individual, or on behalf of an organisation?  Individual  Organisation

Organisation (if applicable): Northern Buller Communities Society Incorporated

Would you gain an advantage in trade competition through this submission?  Yes  No

If you **could** gain an advantage in trade competition through this submission please complete the following:

I am  /am not  directly affected by an effect of the subject matter of the submission that (a) adversely affects the environment; and (b) does not relate to trade competition or the effects of trade competition.

Postal address: 30A Main Road  
Ngakawau

Email: nbcrc@actrix.co.nz Phone: 03 7828276

Signature: [Signature] Date: 7/10/2022

## Your submission:

The specific provisions of the proposal that my submission relates to are:

- |  |  |   |
|--|--|---|
| <input type="checkbox"/> Strategic Direction                       | <input type="checkbox"/> Energy Infrastructure and Transport | <input checked="" type="checkbox"/> Hazards and Risks |
| <input checked="" type="checkbox"/> Historical and Cultural Values | <input type="checkbox"/> Natural Environment Values          | <input type="checkbox"/> Subdivision                  |
| <input type="checkbox"/> General District Wide Matters             | <input type="checkbox"/> Zones                               | <input type="checkbox"/> Schedules                    |
| <input type="checkbox"/> Appendices                                | <input type="checkbox"/> General feedback                    |   |

All submitters have the opportunity to present their feedback to Commissioners during the hearings process. Hearings are anticipated to be held in the middle of 2023. Please indicate your preferred option below:

I wish to speak to my submission  I do not wish to speak to my submission

If others make a similar submission, would you consider presenting a joint case with them at a hearing?

Yes, I would consider presenting a joint case  No, I would not consider presenting a joint case

**Public information** - all information contained in a submission under the Resource Management Act 1991, including names and addresses for service, becomes public information. The content provided in your submission form will be published to the Te Tai o Poutini Plan website and available to the public. It is your responsibility to ensure that your submission does not include any personal information that you do not want published.

Want to know more?  
[tpp.westcoast.govt.nz](http://tpp.westcoast.govt.nz)  
0508 800 118



Te Tai o Poutini  
PLAN  
A combined district plan for the West Coast

# NORTHERN BULLER COMMUNITIES SOCIETY INC.

30A Main Road  
Ngakawau  
WESTPORT 7824

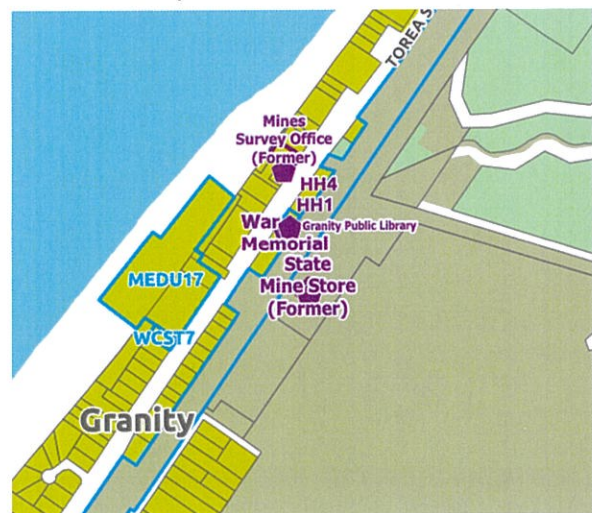


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## NORTHERN BULLER COMMUNITIES SOCIETY – submission to proposed TPP (One District Plan)

The TPP map and aerial photo below identify the Heritage 2 listed former Mines Survey Office owned by the Society. Zoned “Settlement”, we found it difficult to determine which precinct has been allocated to the site.

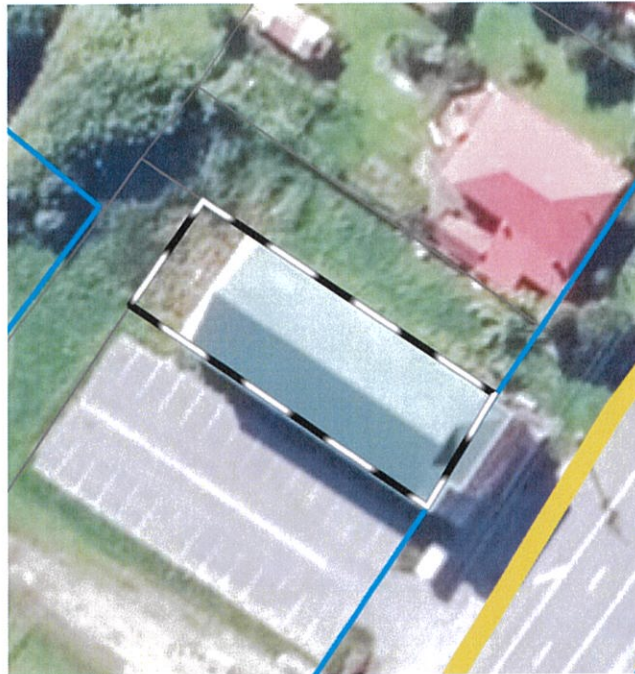
**We submit** that the site boundary is too far north and only appears to encompass half of the listed building itself. The entire site is subject to the Coastal Environment and Land Instability overlays and half of the site is subject to the Coastal Hazard Severe overlay.



**We submit** in favour of the principals of HH – P5, P7 and P8 for historic heritage buildings

<b>HH - P5</b>	When considering proposals for external alteration of <u>historic heritage</u> items identified in <u>Schedule One</u> , the following matters shall be considered: a. Any external alteration will not significantly detract from an item of <u>historic heritage</u> value; or b. The alterations are for the primary purpose of improving structural performance, fire safety or physical access.
<b>HH - P7</b>	Demolition and destruction of <u>historic heritage</u> items identified in <u>Schedule One</u> will not be allowed unless it can be demonstrated, through investigation and assessment by a suitably qualified <u>heritage professional</u> that: a. The extent of the work required to retain the heritage items is of such a scale that the heritage values and integrity of the heritage item would be significantly compromised; b. The costs to retain or repair the heritage item would be unreasonable; c. All other viable alternatives, including <u>relocation</u> and <u>repositioning</u> have been fully considered.
<b>HH - P8</b>	Internal alteration of <u>historic heritage</u> buildings identified in <u>Schedule One</u> assessed as having significant internal values will not be allowed unless it can be demonstrated that: a. The alterations are for the primary purpose of improving structural performance, fire safety or physical access; or b. It is in a serious state of disrepair, and cost to remedy is prohibitive; or c. Any alteration will not detract from its heritage value; or d. It is of a temporary or easily reversible manner and will support its ongoing use; or e. It can be altered in part without significant adverse effects on the heritage values for which the item is listed in <u>Schedule One</u> .

The TTPP map below identifies the building known as The Lyric Theatre also owned by the Society along with the narrow block to the north of the building. Zoned Settlement, it is again not clear which precinct has been allocated to the site. The entire site is subject to the Coastal Environment and Land Instability overlays and a third of the site is subject to the Coastal Hazard Severe overlay.



We understand and accept the objectives and policies of the Coastal Severe overlays proposed.

- Coastal Hazard Overlays – “Coastal Severe” where risk from coastal erosion and inundation have been modelled and mapped, “Coastal Alert” where risk from coastal inundation has been modelled and mapped. “Coastal Setback” where modelling has not been undertaken and is a precautionary approach. “Coastal Tsunami” is where the most significant risk from coastal tsunami has been mapped and is different from coastal tsunami evacuation areas.

We submit in favour of NH – R1 , as this would enable us to reconstruct or replace our buildings within the timeframes provided and we consider both of them lawfully established.

Permitted Activities	
NH- R1	Reconstruction and Replacement of Lawfully Established Buildings in all Natural Hazard Overlays
<p><b>Activity Status Permitted</b> Where:</p> <ol style="list-style-type: none"> <li>1. This is the reconstruction/replacement of a building lawfully established at the time of notification of the Plan; and</li> <li>2. The building has been destroyed or substantially damaged due to fire, natural disaster or Act of God;</li> <li>3. The destroyed/damaged building is reconstructed or replaced within 2 years in the Westport Hazard, Coastal Severe and Flood Severe Overlays;</li> <li>4. The destroyed/damaged building is reconstructed or replaced within 5 years in all other natural hazard overlays; and</li> <li>5. The reconstructed/replaced building is similar in character, intensity and scale to the building that it replaces.</li> </ol>	<p><b>Activity status where compliance not achieved:</b> Refer to specific Natural Hazard Overlay Rules.</p>

In relation to both properties, **we submit** against the current Land Instability Overlay being applied.

We consider the current boundaries of this overlay appear arbitrary and unnecessarily broad through the townships of Granity, Ngakawau and Hector and in many cases do not meet the objectives and policies relating to the purposes of the overlay.

For the buildings above, we find it difficult to understand how any issue of land instability as described below could possibly affect them.

Even taking a precautionary approach, there is simply no risk from slope instability, landslide, debris flow and rockfall to our buildings or indeed many others located in the current overlay.

- **Land Instability Overlay** – This overlay applies to areas where there is risk from slope instability, landslide, debris flow and rockfall.

<b>Natural Hazards Objectives</b>	
<b>NH - O1</b>	To use a regionally consistent, risk-based approach to natural hazard management.
<b>NH - O2</b>	To reduce the risk to life, property and the environment from natural hazards, thereby promoting the well-being of the community and environment.

<b>Policies</b>	
<b>NH - P1</b>	Identify in natural hazard overlays areas at significant risk from natural hazards.
<b>NH - P2</b>	Where a natural hazard has been identified and the natural hazard risk to people and communities is unquantified but evidence suggests that the risk is potentially significant, apply a precautionary approach to allowing development or use of the area.

**We submit** that the Land Instability overlay for the Granity, Ngakawau & Hector areas be reviewed with a more rational and reasoned approach to the policies and objectives as outlined in the plan.