

Online submission

This is a submission that was made online via the Council's website.

Submitter No.	S164
Submitter Name	Elley Group Ltd
Submitter Company/Group Name	Elley Group Ltd
Submitter is contact	Yes
Email	charliee@xtra.co.nz
Wish to be heard	Yes
Joint presentation	No
Trade competition	I could gain an advantage in trade competition through this submission.
Directly affected	I 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.
Withhold contact details?	No

Submission points

Plan section	Provision	Support/oppose	Reasons	Decision sought
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General Rural Zone	GRUZ - R3	Oppose	The requirement for a minimum size allotment of 4ha is unworkable, unnecessary, and based on incorrect ideals. It is neither appropriate, nor advisable in a geographically and low-density populated area like the West Coast. There is very little desire for 4 or 10Ha lots as they are not large enough to be productive but too large to maintain for most family units. We already have a predominance of non-productive coastal land, ideally suited to establish low density, easily maintainable, rural communities, which should not be seen as detrimental in a post COVID world.	The inclusion of a maximum of one residential unit per 10Ha site, in highly productive rural land areas, and/or one residential land unit per 4Ha's in the rest of the General Rural zone, is in complete contrast to the existing and well-established character of rural living/accommodation units, existing across the West Coast.
				There is no necessity to introduce any restriction of this nature as historically, the intensity level of our rurally based residential properties, has been naturally limited comparable with other regions, by our rugged and often uninhabitable topography. We already have a shortage of small rural allotments, of small enough size to be maintained sustainably, by the majority of citizens, wishing to settle here.
				This is only going to increase as New Zealanders look for a quieter, more relaxing rural based life post covid - This does not automatically transfer to needing a minimum of 4ha, never has and never will. Demand is interleaved with a strong sense of rural community based around small but maintainable rural allotments. The proposed restriction is not necessary for any of the reasons included in our vision for the future of the West Coast, and if anything would be a major step backwards if trying to protect our rural character.
				The requirement for rural land allotments of 4ha minimum is something that existed in larger more densely populated regions 30 to 40 years ago, and has long since passed from the Kiwi Psyche. There is an overwhelming desire and capability to maintain the availability of rural lots as small as 2000m2, which are ample size to be enjoyed and maintained in line with the general perception of the West Coast rural lifestyle.
				The indicated requirements in the proposed one district plan would have a disastrous effect on the lifestyle and general appeal of the West Coast and should be removed in its entirety from the plan. The existing minimum size has been dictated by the ability to provide safe and efficient wastewater management and should remain this way, especially in light of a complete lack of evidence for the necessity to change. There is no issue to resolve - this is a purely theoretical planning proposal based on totally different demographics and has no place in our Plan - not now, nor in the future.
				A far more workable requirement would be to limit the number of minimum size allotments, in any nominated area, i.e. a maximum concentration of habitable lots to say 15% of an accumulative 10ha area in the general rural zone and 2 per ha in highly productive land areas. This would achieve a far better outcome, while maintaining the rural character we actually have.
				It is imperative that this proposal is removed from the document and replaced with a proposal based on common sense, current demand and our most probable future lifestyle.

Documents included with submission

None

Natural Hazards	All Natural Hazard Overlays	Amend	<p>The inclusion of the natural hazard zones in their current suggested state, is a gross over-reaction to what is at most, a potential worst-cased based scenario, with very little actual occurrence of most situations, in relation to the time and investment which can be destroyed at the stroke of a risk-averse planner's pen.</p> <p>Straight up - No one can mitigate risk completely and we already know that, however that does not require the implementation of zoning areas, so intense in size and conditions, that they effectively condemn the areas covered to little more than a scrubland future, and dramatically restrict the freedom of those people it is meant to benefit.</p> <p>As it is, our existing demographics and low socio-economic situation, demand that we utilise the little available land, to the best possible use - there is a massive conservation estate in position, and we must not allow ourselves to be overly influenced by well-meaning but totally impracticable idealism-based planning.</p> <p>Risk is a factor of life - we have got where we are by learning to live with it and manage it - not run away from it. For example, the best available science tells us there is very little, if any real evidence of a Tsunami event having occurred, or likely to occur anywhere along our Western facing Coastline - Anecdotal evidence and summation-based evidence is not the same as factual evidence. The factual evidence we do have is based on our location on a continually uprising Australasian plate, while most seismic activity is centred around the Pacific Ring of Fire.</p> <p>The inclusion of a Tsunami Zone appears to be more based on the feeling we should have one, than the actual necessity, and the ongoing restrictions resulting in the suggested rules, are like hitting a sand fly with a sledgehammer. There is no realisable benefit to anyone except the planner's desire to produce a zero-risk document. How you can possibly link restrictions on completing a subdivision, to a risk related to a 1 in 1000-year event, is almost laughable in concept.</p> <p>This whole tsunami zone needs to be removed and replaced with an acknowledgement of inherent but extremely unlikely natural events which may occur at an indeterminable time - i.e. AN ACT OF NATURE AND/OR GOD - not something a planning document can make the slightest difference to.</p> <p>The same logic needs to be applied to the whole hazard zone overlay - it is not acceptable to produce a document so restrictive, more so to satisfy the political desires of the current government, rather than the needs of the people that live here. Governments change and so does their ideals. The hazards need to be managed and not based on a false sense of total risk reduction - there is no such thing.</p> <p>There is no reason or logic for the West Coast to have a designated Tsunami Zone, which can only be based at best on a wildly unprovable statistical risk almost akin to zero. Remove this and put some realism back into the planning sector - Plan for real and measurable risks and leave the rest to nature.</p>	<p>The inclusion of many of the natural hazard zones in their current suggested state, suggests a gross over-reaction to what is, at most, a potential worst-cased based scenario, with very little actual occurrence of most possible situations.</p> <p>The proposed restrictions are draconian, in relation to actual proven risk and ignore the time and investment of the existing ratepayers, all of which can be destroyed at the stroke of a risk-averse planner's pen.</p> <p>Straight up - No one can mitigate risk completely and we already know that, however that does not require the implementation of zoning areas, so intense in size restrictions, and restrictive conditions, that they effectively condemn some areas to little more than a scrubland future, and dramatically restrict the freedom and future lifestyle of those same people it is meant to benefit.</p> <p>As it is, our existing topography, demographics and low socio-economic situation, demand that we utilise what little land we have available, to the best possible use - there is a massive conservation estate in position, and we must not allow ourselves to be overly influenced by idealism-based planning. Any decisions need to take account of the current landowners wishes and be based on reality and not speculative forecasting. Consensus of opinion, as to what the future may bring, does not equate to valid and/or proveable science.</p> <p>Risk is a factor of life - we have got where we are by learning to live with it and manage it - not run away from it. For example, the best available science tells us there is very little, if any real evidence of a Tsunami event having occurred, or likely to occur, anywhere along our Western facing Coastline - Anecdotal evidence and summation-based outcomes, is not factual proof. The factual evidence we do have, is based on our location, on a continually uprising Australasian plate, while most seismic activity is centred around the Pacific Ring of Fire. Reference to predicted Sea level rise, ignores the geological facts that we can actually measure so in themselves</p> <p>The inclusion of a Tsunami Zone, appears to have arisen from the feeling we should have one, rather than actual necessity, and the ongoing restrictions resulting from the suggested rules, are like hitting a sand fly with a sledgehammer. There is no realisable benefit to anyone, except the inherent planner's desire to produce a zero-risk document. How you can possibly justify placing restrictions on completing a subdivision, on a risk related to a possible 1 in 1000-year event, is almost laughable in concept.</p> <p>This whole tsunami zone overlay needs to be removed and replaced with an acknowledgement of inherent, but extremely unlikely natural events, which may occur at an indeterminable time - i.e. AN ACT OF NATURE AND/OR GOD - not something a planning document can make the slightest difference to.</p> <p>The same logic needs to be applied to the whole proposed hazard zone overlay - it is not acceptable to produce a document so restrictive, to satisfy the political desires of the current government, rather than the needs of the people that live here. Governments change and so do their ideals. The hazards need to be managed but not based on a false sense of achieving total risk reduction - there is no such thing.</p> <p>There is no logic, for the West Coast to have a designated Tsunami Zone, which can only be based at best, on a wildly unprovable statistical risk, almost akin to zero.</p> <p>Remove this and put some realism back into the planning sector - Plan for real and measurable risks and leave the rest to nature. We do not want a plan where the restrictions are based on reducing the risk to the Councils, rather than the people they represent.</p>
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