

**Have  
your  
say!**

# Te Tai o Poutini Plan Proposed Plan

# Submission form

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: Andrea

Surname: Millar

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


Organisation (if applicable): Ara Poutama Aotearoa, Department of Corrections

Would you gain an advantage in trade competition through this submission?  Yes  NoIf 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: Private Bag 1206, Wellington, 6140

Email: andrea.millar@corrections.govt.nz

Phone: 027 216 7741

Signature: 

Date: 28 October 2022

## Your submission:

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

- |   |  |  |
|---|--|--|
| <input checked="" type="checkbox"/> Strategic Direction | <input type="checkbox"/> Energy Infrastructure and Transport | <input type="checkbox"/> Hazards and Risks |
| <input type="checkbox"/> Historical and Cultural Values | <input type="checkbox"/> Natural Environment Values          | <input type="checkbox"/> Subdivision       |
| <input type="checkbox"/> General District Wide Matters  | <input checked="" 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?**  
[www.tppp.nz](http://www.tppp.nz)  
**0508 800 118**



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





## ARA POUTAMA AOTEAROA, THE DEPARTMENT OF CORRECTIONS: SUBMISSION ON THE TE TAI O POUTINI PLAN

**To:** Te Tai o Poutini Plan Committee  
c/- West Coast Regional Council  
PO Box 66  
Greymouth 7840

Email: [info@tpp.nz](mailto:info@tpp.nz)

**From:** Ara Poutama Aotearoa, the Department of Corrections  
Private Box 1206  
Wellington 6140

Attention: Andrea Millar – Manager, Resource Management and Land Management  
Phone: 027 216 7741  
Email: [andrea.millar@corrections.govt.nz](mailto:andrea.millar@corrections.govt.nz)

Ara Poutama Aotearoa, the Department of Corrections (**Ara Poutama**) makes submissions on the Proposed Te Tai o Poutini Plan (**Proposed Plan**) in the **attached** document.

Ara Poutama confirms it could not gain an advantage in trade competition through this submission.

Ara Poutama would like to be heard in support of its submission. If other submitters make a similar submission, Ara Poutama will consider presenting a joint case with them at a hearing.

A handwritten signature in blue ink, appearing to read 'Andrea Millar', is positioned above a horizontal line.

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**Andrea Millar – Manager, Resource Management and Land Management**

For and on behalf of Ara Poutama Aotearoa, the Department of Corrections

Dated this 28 October 2022

## Introduction

Ara Poutama Aotearoa, the Department of Corrections (**Ara Poutama**) is responsible under the Corrections Act 2004 for enforcing sentences and orders of the criminal court and the New Zealand parole board. In meeting this responsibility, Ara Poutama establishes and operates custodial and non-custodial corrections facilities, monitors people in the care of the Ara Poutama serving their sentences in the community, and provides supported and transitional accommodation to assist people to reintegrate back into the community.

## Custodial Corrections Facilities

Custodial corrections facilities include prisons and detention facilities and may include non-custodial transitional accommodation (i.e. on a custodial facility site) for people with high and complex needs, who have completed a prison sentence and are being supported and prepared for reintegration and transition back into the community. Non-custodial rehabilitation activities and programmes may also occur on-site.

Ara Poutama does not operate any custodial corrections facilities on the West Coast.

## Non-Custodial Community Corrections Sites

Non-custodial community corrections sites include service centres and community work facilities and are essential social infrastructure. Non-custodial services and their associated infrastructure play a valuable role in reducing reoffending. Community work helps offenders learn vital skills and to give back to their community, and in return the community benefits from improved amenities. Ara Poutama considers that its services enable people and communities to provide for their social and cultural well-being and for their health and safety, and therefore those activities and services contribute to the sustainable management purpose of the Resource Management Act 1991 (**RMA**).

The service centres provide for probation, rehabilitation and reintegration services. Offenders report to probation officers as required by the courts or as conditions of parole. Ara Poutama's staff use service centres to undertake assessments and compile reports for the courts, police and probation officers. Service centres may also be used as administrative bases for staff involved in community-based activities, or as a place for therapeutic services (e.g. psychological assessments). The overall activity is effectively one of an office where the generic activities involved are meetings and workshop type sessions, activities which are common in other office environments.

In addition to these service centres, Ara Poutama operates community work facilities. Community work is a sentence where offenders are required to undertake unpaid work for non-profit organisations and community projects. Offenders will report to a community work facility where they subsequently travel to their community work project under the supervision of a Community Work Supervisor. The community work facilities can be large sites with yard-based activities and large equipment and/or vehicle storage.

Service centres and community work facilities may also be co-located on the same site.

Community corrections sites support offenders living in that community. Ara Poutama therefore looks to locate its sites in areas accessible to offenders, and near other supporting government agencies. Commonly, sites are therefore located in commercial or business areas, but may also be located in industrial areas, where large lots and accessibility suit the yard-based nature of some operations. As community corrections facilities are not sensitive to the effects of an industrial environment (e.g. noise, high traffic movements, etc), they are not prone to reverse sensitivity.

Ara Poutama currently operates two non-custodial community corrections sites on the West Coast, located at:

- 76 Russell Street, Westport.
- 20 Johnston Street, Greymouth.

Both sites are community corrections service centre and community work facilities. Both sites are designated for community corrections activity under the schedule of designations in *Part 3 – Area Specific Matters – Designations / Minister for Corrections* of the Proposed Plan. The Westport site is within the Town Centre Zone in the Proposed Plan, and the Greymouth site is within the Light Industrial Zone.

In addition to the above sites, Ara Poutama operates reporting offices co-located with the New Zealand Police or Ministry of Social Development at the following locations:

- Reefton Police Station, 86 Broadway Street, Reefton.
- Heartland Services, Ministry of Social Development, 49 Tancred Street, Hokitika.
- Franz Josef Police Station, 13 Main Road, Franz Josef.

## **Residential Activities**

Ara Poutama operates residential housing in the community throughout New Zealand, providing support for some people in its care to assist with their transition and/or integration in the community. There is a range of housing, rehabilitation, reintegration and support provided in these facilities, depending on the needs of the residents. Housing and associated support services may be for people following their release from prison, or may be used to accommodate those on bail or community-based sentences (such as home detention).

Residential accommodation (with support) provides necessary facilities, such as sleeping, cooking, bathing and toilet facilities, which encompass a typical household living scenario; and a typical residential dwelling is utilised for such purposes. People living in this residential environment are not detained on-site, the same as anyone else living in the community, except that some people may be electronically monitored and/or supervised. In some instances, supervisory staff are present on-site to provide a level of care (being a range of rehabilitation, integration and support services) appropriate to meet the needs of the individual(s) residing at the site. It is noted that these support staff do not reside on-site and have an alternative residential address. In other instances, supervisory staff will provide support on a part-time basis.

The Courts may sentence an offender to home detention as an alternative to imprisonment. Individuals on home detention serve a home-based sentence at a suitable and approved residence and are electronically monitored 24 hours a day, seven days a week. The purpose of electronic monitoring is to deter the offender from breaching conditions that relate to his or her whereabouts and monitor compliance with those conditions.<sup>1</sup> Home detention and electronic monitoring allow individuals to seek or maintain employment, complete a sentence of community work if imposed, access programmes to address their offending, be involved in prosocial activities, and maintain their family relationships. It is an increasingly common sentence for many individuals in our care who otherwise would have received a short prison sentence for their offending (they can be sentenced to home detention from 14 days to one year). People on a home detention sentence are generally required to remain at a typical residential dwelling.

Ara Poutama is responsible for a range of residential accommodation (with support), which vary in nature and scale, all which fall within the ambit of a residential activity.

Demand for these services exist nationally, including within the West Coast. It is important that provision is made to enable residential accommodation activities (with support) to establish, operate and redevelop, within appropriate areas.

## **Ara Poutama's Submission on the Proposed Te Tai o Poutini Plan**

Ara Poutama has an interest in the implications that the Proposed Plan will have on the establishment and operation of custodial facilities, non-custodial facilities, and residential accommodation (with support), on the West Coast.

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<sup>1</sup> Sentencing Act 2002, section 80E.

Ara Poutama’s specific submissions on the Proposed Plan are outlined in the following table below.

## Submissions

Proposed Plan Provision	Submission	Relief Sought (additions shown in <u>underline</u> , deletions shown in <del>strikethrough</del> )
<p>Part 1 – Introduction and General Provisions / Interpretation / Definitions</p> <p>“Community corrections activity”</p>	<p><b>Support</b></p> <p>Ara Poutama requests that the definition of “community corrections activity” is retained.</p> <p>The definition is consistent with the wording provided for in the National Planning Standards.</p> <p>Community corrections activities are essential social infrastructure and play a valuable role in reducing reoffending. They enable people and communities to provide for their social and cultural well-being and for their health and safety.</p>	<p>1. Retain the definition of “community corrections activity”.</p>
<p>Part 1 – Introduction and General Provisions / Interpretation / Definitions</p> <p>“Residential activity”</p>	<p><b>Support</b></p> <p>Ara Poutama requests that the definition of “residential activity” is retained.</p> <p>The definition is consistent with the wording provided for in the National Planning Standards.</p> <p>This definition applies to supported accommodation activities, such as those provided for by Ara Poutama; i.e. people living in a residential situation, who are subject to support and/or supervision by Ara Poutama.</p> <p>Supported residential accommodation activities, such as those provided for by Ara Poutama are an important component of the reintegration process for people under Ara Poutama’s care. It enables people and communities to provide for their social and cultural well-being and for their health and safety.</p>	<p>1. Retain the definition of “residential activity”.</p>
<p>Part 1 – Introduction and General Provisions / Interpretation / Definitions</p> <p>“Residential unit”</p>	<p><b>Support</b></p> <p>Ara Poutama requests that the definition of “residential unit” is retained.</p> <p>The definition is consistent with the wording provided for in the National Planning Standards.</p> <p>This definition applies to supported accommodation activities, such as those provided for by Ara Poutama; i.e. people living in a residential situation, who are subject to support and/or supervision by Ara Poutama.</p> <p>Supported residential accommodation activities, such as those provided for by Ara Poutama are an important component of the reintegration process for people under Ara Poutama’s care. It enables people and communities to provide for their social and cultural well-being and for their health and safety.</p>	<p>1. Retain the definition of “residential unit”.</p>

Proposed Plan Provision	Submission	Relief Sought (additions shown in <u>underline</u> , deletions shown in <del>strikethrough</del> )
<p>Part 1 – Introduction and General Provisions / Interpretation / Definitions</p> <p>“Household”</p>	<p><b>New Provision</b></p> <p>The definition residential unit refers to a “household”, which is not defined in the Proposed Plan. Ara Poutama seeks that a new definition be added, to clarify that a household is not necessarily limited to a family unit or a flatting arrangement (which are more commonly perceived household situations).</p> <p>The addition of a definition of “Household” will enable Ara Poutama to implement supported accommodation activities, subject to an appropriate regulatory framework, within the West Coast.</p>	<p>1. Insert new definition provision as follows:</p> <p><b><u>Household</u></b></p> <p><u>means a person or group of people who live together as a unit whether or not:</u></p> <p>a. <u>any or all of them are members of the same family;</u> <u>or</u></p> <p>b. <u>one or more members of the group (whether or not they are paid) provides day-to-day care, support and supervision to any other member(s) of the group.</u></p> <p>2. Any consequential amendments required to give effect to this relief.</p>
<p>Part 1 – Introduction and General Provisions / Interpretation / Definitions</p> <p>“Supported residential accommodation”</p>	<p><b>Neutral</b></p> <p>Ara Poutama’s position is that the definition of “residential activity” entirely captures supported accommodation activities, such as those provided for by Ara Poutama; i.e. people living in a residential situation, who are subject to support and/or supervision by Ara Poutama. That is, supported accommodation activities use “<i>land and building(s) for people’s living accommodation</i>” (as per the definition of “residential activity”).</p> <p>However, should Council disagree, the definition of “supported residential accommodation”, and the associated provisions throughout the Proposed Plan, would encapsulate these services provided by Ara Poutama and therefore the wording of the definition should be retained as notified.</p>	<p>1. Retain the definition of “supported residential accommodation” if the Council does not consider the definition of “residential activity” captures the supported accommodation activities provided by Ara Poutama.</p>
<p>Part 2 – District-Wide Matters / Strategic Direction / Urban Form and Development</p> <p>Objective for supported residential accommodation in the District Wide Matters</p>	<p><b>Support</b></p> <p>Ara Poutama requests objective UFD - O1 is retained.</p> <p>Objective UFD-O1 appropriately includes reference to “support inclusivity and housing choice for the diversity within the community now and into the future”. This provides for supported accommodation activities, such as those provided for by Ara Poutama; i.e. people living in a residential situation, who are subject to support and/or supervision by Ara Poutama.</p> <p>Supported residential accommodation activities, such as those provided for by Ara Poutama, are an important component of the rehabilitation and reintegration process for people under Ara Poutama’s care. They enable people and communities to provide for their social and cultural well-being and for their health and safety.</p>	<p>1. Retain objective UFD - O1.</p>



Proposed Plan Provision	Submission	Relief Sought (additions shown in <u>underline</u> , deletions shown in <del>strikethrough</del> )
<p>Part 3 – Area-Specific Matters / Zones / Commercial and Mixed Use Zones</p> <p>Objective and policy for community corrections activities in the Commercial and Mixed Use Zone</p>	<p><b>Support</b></p> <p>Ara Poutama requests objective and policy CMUZ - O1 and CMUZ - P2 are retained.</p> <p>Objective CMUZ – O1 and CMUZ – P2 appropriately enables the development of community corrections activities in commercial and mixed use zones.</p> <p>Community corrections activities are essential social infrastructure and play a valuable role in reducing reoffending. They enable people and communities to provide for their social and cultural well-being and for their health and safety.</p>	<ol style="list-style-type: none"> <li>1. Retain objective CMUZ - O1 and policy CMUZ - P2.</li> </ol>
<p>Part 3 – Area-Specific Matters / Zones / Industrial Zones</p> <p>Objective and policy for community corrections activities in the Industrial Zones</p>	<p><b>Support in part</b></p> <p>Ara Poutama requests the objective INZ – O1 is amended and policy INZ-P6 is retained.</p> <p>While community corrections activities are listed as a permitted activity in the General Industrial and Light Industrial zones, the associated Industrial Zone objective does not recognise the acceptability of, or enable those activities.</p> <p>Industrial Zone Objective INZ - O1 currently states: <i>“To provide for the efficient and effective operation and development of industrial activities in the INZ – Industrial Zones in a manner that maintains a standard of amenity appropriate to these areas and does not comprise the amenity of adjoining areas”</i>.</p> <p>Community corrections activities do not fall under the Proposed Plan definition of “industrial activities”.</p> <p>Community corrections activities are essential social infrastructure and play a valuable role in reducing reoffending. They enable people and communities to provide for their social and cultural well-being and for their health and safety. Ara Poutama accordingly requests the objective should be amended to also recognise and enable other compatible activities to ensure appropriate activities, including non-custodial community corrections sites, are able to establish in the Industrial Zones consistent with the proposed rules.</p>	<ol style="list-style-type: none"> <li>1. Amend Industrial Zone Objective INZ - O1 included in Part 3 – Area-Specific Matters / Zones / Industrial Zones as follows: <i>“To provide for the efficient and effective operation and development of industrial activities and <u>other compatible activities</u> in the INZ – Industrial Zones in a manner that maintains a standard of amenity appropriate to these areas and does not compromise the amenity of adjoining areas”</i>.</li> <li>2. Retain policy INZ- P6.</li> <li>3. Any consequential amendments required to give effect to this relief.</li> </ol>
<p>Part 3 – Area-Specific Matters / Zones / Residential Zones</p> <p>Objective and policy for supported residential accommodation in the Residential Zones</p>	<p><b>Support</b></p> <p>Ara Poutama requests objective RESZ - O1 and policy RESZ - P1 are retained.</p> <p>Objective RESZ – O1 and policy RESZ – P1 provide for supported accommodation activities, such as those provided for by Ara Poutama. i.e. people living in a residential situation, who are subject to support and/or supervision by Ara Poutama.</p> <p>Supported accommodation activities provided for by Ara Poutama are an important component of the rehabilitation and reintegration process for people</p>	<ol style="list-style-type: none"> <li>1. Retain objective RESZ - O1 and policy RESZ - P1.</li> </ol>

Proposed Plan Provision	Submission	Relief Sought (additions shown in <u>underline</u> , deletions shown in <del>strikethrough</del> )
	<p>under Ara Poutama’s supervision. They enable people and communities to provide for their social and cultural well-being and for their health and safety.</p>	
<p>Part 3 – Area-Specific Matters / Zones</p> <p>Permitted land use activity rules for community corrections activities in the Commercial Zone, Mixed Use Zone, Town Centre Zone, General Industrial Zone and Light Industrial Zone</p>	<p><b>Support</b></p> <p>Ara Poutama requests that the permitted land use activity rules applying to community corrections activities in the Commercial Zone, Mixed Use Zone, Town Centre Zone, General Industrial and Light Industrial Zone are retained.</p>	<ol style="list-style-type: none"> <li>1. Retain the land use activity rules applying to “community corrections activity” in the Commercial Zone, Mixed Use Zone, Town Centre Zone, General Industrial and Light Industrial Zone. These include: <ul style="list-style-type: none"> <li>• COMZ - R1</li> <li>• MUZ - R2</li> <li>• TCZ - R1</li> <li>• GIZ - R6</li> <li>• LIZ - R4</li> </ul> </li> </ol>
<p>Part 3 – Area-Specific Matter / Zones</p> <p>Permitted land use activity rules for residential activity, residential unit and supported residential accommodation in the General Residential Zone, Large Lot Residential Zone and Medium Density Residential Zone</p>	<p><b>Support</b></p> <p>Ara Poutama requests that the permitted land use activity rules applying to residential activity, residential unit and supported residential activities in the General Residential Zone, Large Lot Residential Zone and Medium Density Residential Zone are retained.</p>	<ol style="list-style-type: none"> <li>1. Retain the land use activity rules applying to “residential activity”, “residential unit” and “supported residential accommodation” in the General Residential Zone, Large Lot Residential Zone and Medium Density Residential Zone. These include: <ul style="list-style-type: none"> <li>• GRZ - R1</li> <li>• GRZ - R8</li> <li>• LLRZ - R1</li> <li>• LLRZ - R8</li> <li>• MRZ - R1</li> <li>• MRZ - R8</li> </ul> </li> </ol>
<p>Zone Maps</p>	<p><b>Support in part</b></p> <p>The e-plan incorrectly refers to the address for designation MCOR 1 – CCS Johnston Street, Greymouth as being 12 Johnston Street. Ara Poutama requests the address on the e-plan for designation MCOR 1 - CCS Johnston Street, Greymouth is amended to 20 Johnston Street.</p> <p>The e-plan incorrectly refers to the address for designation MCOR 2 – CCS Russell Street, Westport as being 76A Russell Street. Ara Poutama requests the address on the e-plan for designation MCOR 2 - CCS Russell Street, Westport is amended to 76 Russell Street.</p> <p>The Proposed District Plan Zoning PDF Map 149 does not show designation MCOR 2 – CCS Russell Street, Westport. Ara Poutama requests designation</p>	<ol style="list-style-type: none"> <li>1. Amend the address on the e-plan for designation MCOR 1- CCS Johnston Street, Greymouth is amended to 20 Johnston Street.</li> <li>2. Amend the address on the e-plan for designation MCOR 2 - CCS Russell Street, Westport is amended to 76 Russell Street.</li> <li>3. Amend the Proposed District Plan Zoning PDF Map 144 to show designation MCOR 2 – CCS Russell Street.</li> <li>4. Amend the Proposed District Plan Zoning PDF Map 171 to delete designation MCOR 3 – CCS Revell Street, Hokitika.</li> </ol>

Proposed Plan Provision	Submission	Relief Sought (additions shown in <u>underline</u> , deletions shown in <del>strikethrough</del> )
	<p>MCOR 2 – CCS Russell Street is shown on the Proposed District Plan Zoning PDF Map 149.</p> <p>The Proposed District Plan Zoning PDF Map 171 shows designation MCOR 3 – CCS Revell Street, Hokitika. This site is no longer owned or operated by Ara Poutama, and the site is no longer required for community correction purposes. Ara Poutama requests the designation MCOR 3 – CCS Revell Street, Hokitika is deleted from the Proposed District Plan Zoning PDF Map 171.</p>	<p>5. Any consequential amendments required to give effect to this relief.</p>

