

11th November 2022

Emailed to info@tppp.nz on 11th November 2022



Dear TTPP Staff Members

Submission on the proposed Te Tai o Poutini Plan (TTPP) for myself, Lara Kelly as an Individual

Some of the points below are from personal experiences and how the current Westland District Plan has affected our community, as well as offering support and ideas for the proposed TTPP rules.

1. I operate my own surveying and resource consent business and over the past five years I have seen a demand for people and businesses wanting commercial/industrial lots in and around Hokitika. The requirement to gain a resource consent, if wanting to carry out a commercial activity in the rural zone, is arduous and expensive for people. I have gained many consents over the years for my clients, but recently I have noticed a harder environment when working to get consents through the process for my clients – one consent was declined last year, even though the client gained all neighbours approvals, spent money on a specialist noise report (which supported the activity), and offered landscaping. This was incredible disappointing, not only for myself (as I worked extremely hard on the proposal and offered many mitigation measures), but a West Coast born and bred business is now looking elsewhere (not in Westland District) for a place to operate their business from.

I get many people and businesses contacting me to see where they could operate their business from, as they would like to live in Hokitika and operate their business from here. But when they learn that there is no industrial land available (or even for a light industrial activity) and that they will require resource consent (if in the rural zone) they sometimes do not carry out the activity in Westland. That is disappointing. We need more land available for commercial/industrial (whether Light Industrial or General Industrial) for businesses to thrive.

2. In the proposed TTPP there is a lot of scope for residential areas and activities – I think this is a positive as people need land and dwellings to live in. But where do the people who live in those dwellings work? I think there needs to be a better balance of commercial/industrial land (whether Light Industrial or General Industrial) to that of the residential. The proposed TTPP has different proposed areas for Light Industrial and General Industrial, however it must be noted that most of these are *existing* activities that already use up most of the land in that zone (e.g. Westland Milk, ITM Hokitika, Venison Factory, Westroads at Kaniere, all of the existing buildings at the Airport, Three Mile (some activities present)). The only new area is

the General Industrial area to the north of Kaniere. If we are to think of the future of Hokitika and surrounds, we need more Industrial land. I am not sure if Kaniere is a good fit for General Industrial (full disclosure – I live at Pine Tree Road and it is not my intention to be a NIMBY), but I think that large General Industrial needs to be easily and efficiently accessible and easily serviced and the land easily able to be built on (without arduous engineering requirements). Yes, power lines go through the site, but looking at the Roding Network I am not so sure that Kaniere is the best fit. Other Ngāi Tahu land at Adair Road, near the SH side, is a good fit as it is easily serviced with the SH only 500m away from the site. I also think that having General Industrial near Kaniere is not a good fit with regard to noise, dust, lighting effects. Whereas at Adair Road there are minimal neighbours. And effects on those neighbours could be minimized by requiring a buffer (vegetated bund) along the road boundary.

Another area that should be considered (if the Ngāi Tahu land at Kaniere and Adair Road land is not viable) is north of Hokitika between West Drive and north along the SH6 to One Mile Line Road. There are areas in there that I think would suit an Industrial Park as they would be secluded from housing development and accessible to the SH6 (from looking at land available and how other regions have an Industrial zones out of town, I think Kaiata Park, east of Greymouth is an example of a job well done of General Industrial).

3. The current WDP, made operational in June 2002, had areas of Industrial land and the majority of this was (and is) owned by the WDC (the large area of industrial zoned land near the airport). My understanding is that this land cannot be bought by Joe/Jane Bloggs. To not be able to own the land that you need for a bank loan is not the best way to operate a business and I think that this has stymied growth in industrial activities in Hokitika. I think this is another reason we need more industrial land in the proposed plan as the previous design of industrial land was a huge oversight of the WDC and people who were involved with the current WD Plan.
4. I support that the land along the west side of the SH6, from approximately 200m north of Richards Drive, north to the Hokitika Oxidation ponds is proposed to be Light Industrial.
5. I think that Commercial zoned land should be along the east side of the SH6 from Weld to Stafford Streets. Why has this not happened? Is this an oversight from the people who put forward the proposed zones? This area should be commercial as most (if not all) of the current activities fit into that definition. Also, in 2022 with all stakeholders having many, many years experience with the RMA, mitigation measures of vegetation, colour palette of buildings blending to the environment plus other mitigation measures could be encouraged and a way to make commercial land work in this area.
6. Subdivision rules: SUB – R6, I think that parts of this are excessive e.g. if only part of a parcel is located within overlays as specified in point 4, this should not automatically result in the

entire parcel being considered inappropriate for subdivision (and it should not be *non-complying*, I think *discretionary* is more appropriate). A subdivision site suitability report is an appropriate way to manage this issue.

7. SUB – R7 & R9, I think that the heading is unclear given that areas of Significant indigenous biodiversity have not been mapped (or if they have, where is this information?), and this could be very restrictive for some landowners. The rules need to be less restrictive and more enabling (and clearer).
8. SUB – R12, I think that the activity status (where there is non-compliance) should be *Discretionary* and not *Non-complying*.
9. SUB – R15, R16 & R18, some parts of these rules seems very restrictive and I think that the activity status, where there is non-compliance, should be deleted as there should be no escalation to Non-Complying status.
10. SUB – R24, this rule is too restrictive and should this be *Discretionary*, instead of *non-complying*.
11. SUB – R26 & R28, if only part of a parcel is located within the specified hazard overlay this should not automatically result in the entire parcel being considered inappropriate for subdivision. A subdivision site suitability report is the appropriate way to manage this issue. Amend to *discretionary* (instead of *Non-complying*).
12. SUB – R27, seems too restrictive, either delete or change to discretionary.
13. SUB – S1, Rural Lifestyle is too large and should be 5000m², General Rural Zone is too large and should be 1ha (except 10ha in Highly Productive land precinct).
14. On carrying out this submission and working with the TTPP for the past few months when doing Resource Consent Applications for clients e.g. applying for a resource consent to the WDC on behalf of a client and the need to address/assess the TTPP, I have noticed that the format of the TTPP mapping programme is not practical. I can work the programme, as I have a good understanding of mapping programmes and the TTPP. However, I do not think that Jane/Joe Bloggs could easily navigate the current system and it needs to be easier for a landowner. I have voiced this to the TTPP Planner (I think it was Edith) that I think a person should be able to click on their land parcel, and ***all*** associated layers with that land come up (on the left-hand side). Then from there, you should be able to click on each specific layer, and all the links to the wording part of the plan come up. At the moment some of my client's land parcels do not even register when I click on them – I get the "Please wait" and I wait and wait and nothing happens. And on other client's land parcels, some layers are shown (on the left hand side) but not all layers... so you have to go searching. Yes, I can do that, but the system

needs to be simpler. I think that the set up of the TTPP programme is extremely important so that people can access the required information to be able to make an informed submission about their land and proposed layers that TTPP want to put on it.

Thank you for the opportunity to make a submission and to put forward my own points of view on the future of our district which I am passionate about.

Regards



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- I do wish to be heard.
- I would not gain an advantage in trade competition though this submission