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SUBMISSIONS ON TE TAI O POUTINI PLAN Under Clause 6 of the First Schedule of the Resource Management Act 1991

T	West Coast Design al Courseil
То:	West Coast Regional Council

By email: <u>info@ttpp.nz</u>

- Submitter: Christopher and Donna Meates
- Address for Service: Tai Poutini Resources Ltd PO Box 257 Greymouth 7840

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1. Submitters

- 1.1 On behalf of Christopher and Donna Meates (the submitters), we submit on the Proposed Te Tai o Poutini Plan.
- 1.2 The submitter could not gain an advantage in trade competition through this submission.
- 1.3 The submitter has interests in properties which are to be zoned within the General Rural Zone.
- 1.4 The specific provisions which this submission relates to are:
 - 1.4.1 SUB R3
 - 1.4.2 SUB-S1
 - 1.4.3 SUB R18
 - 1.4.4 GRUZ-R3
 - 1.4.5 GRUZ R33
 - 1.4.6 The objectives and policies to which these provisions seek to give effect.
- 1.5 The reasons for the submission and the relief sought are set out below.
- 1.6 The suggested revisions do not limit the generality of the reasons for the submission.
- 1.7 The submitter wishes to be heard in support of this submission.





1.8 The submitter will consider presenting a joint case with others presenting similar submissions.

2. Background to the submission

2.1 The submitter has interests in land that is to be zoned General Rural Zone.

3. Summary of submission

3.1 The submitter is concerned at proposed rule SUB – R3, because it makes subdivision a controlled activity if it complies with the applicable standards, which are set out in SUB-S1 and has a minimum lot size for subdivisions of 4ha within the General Rural Zone. This rule is considered inappropriate, as it will lead to rural allotments that are too small for productive rural uses and too big for efficient residential use. Nevertheless, the residential use of such allotments will be permitted by Rule GRUZ -R3. The current Westland District Plan provides for subdivision within the Rural Zone down to 5000m2 as a discretionary activity, which is considered to be a more appropriate size for residential subdivision, also as a controlled activity.

4. Reasons for the submission

- 4.1 The submitter opposes SUB-S1 as they have property within the General Rural Zone that they are considering would be suitable for subdivision for residential use within the life of this plan. However, the 4ha minimum size is, as indicated above, too small for viable primary production use. As such it will tie up4 ha of land into one single land unit that is effectively thereby no longer available and removed from viable primary production use. There is no indication that this lot size is optimal to maximise the rural amenity benefits of residential use of the General Rural Zone. Rather, the 5,000m² size is still capable of providing those benefits, but results in a much more efficient use of the limited physical resource that is land, as it provides for twice the number of residential uses for the same amount of land taken out of viable primary production. This efficiency is increased by the fact that it renders such subdivision more economically viable for the submitter.
- 4.2 The submitter also opposes GRUZ-R3 with respect to the minimum residential density for the General Rural Zone and seeks that this is reduced to 5,000m² for the same reasons, as it renders ties the permitted residential use to the same minimum lot size.
- 4.3 The submitter does not agree with the proposed minimum allotment size in the General Rural Zone, because 4ha is not of sufficient size to be an economic farming unit, and in the submitter's, experience is too large on the West Coast for lifestyle block development. The 4ha minimum allotment size may be appropriate in more arid parts of the country where a larger area is required to provide sufficient grass for lifestyle block needs, however 5,000m² is more than sufficient in the West Coast context due to its high rainfall and higher pasture growth rate. The proposed larger lot size will also result in lot sizes that are not appropriate or what the market desires and could lead to the degradation of the quality of the rural environment





through the carving up of farmland into large blocks that become unkempt and overcome with weed species.

5. Relief sought

- 5.1 The submitter seeks to decrease the subdivision minimum allotment size of the General Rural Zone down to 5,000m2 to align with what is currently provided for within the current Westland District Plan. Amend rule (standard) SUB-S1 to reduce the minimum allotment size to 5,000m2 so that subdivision in the Rural General Zone with that lot size is a controlled activity under Rule SUB 3.
- 5.2 The submitter seeks to reduce the minimum density for the General Rural Zone down to 5,000m2 to align with the relief sought above. Therefore, the submitter seeks to amend GRUZ-R3 to reduce the minimum density to one unit per 5,000m2 net site area.
- 5.3 Alternative, consequential, or necessary additional relief to give effect to the matters raised generally in this submission.

Signed on behalf of Christopher and Donna Meates Jorja Hunt Resource Management Consultant **Tai Poutini Resources Ltd**

