

Te Tai o Poutini Plan Team
PO Box 66
GREYMOUTH 7840

Sent via email to: info@tpp.nz

11 November 2022

Dear Te Tai o Poutini Plan Team,

Submission to proposed Te Tai O Poutini Plan | West Coast

Contact details are as follows:

Name: Frank & Jo Dooley

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Address for Service: 41 Orowaiti Road Westport

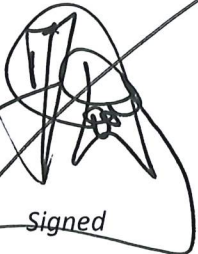
Trade Competition Declaration:

We **could not** gain an advantage in trade competition through this submission.

Hearing Options (Tick One):

- We do wish to be heard at a hearing
 We do not wish to be heard at a hearing

Regards



Signed



11 November 2022

Te Tai o Poutini Plan – Proposed Plan
info@tppp.nz

Dear Sir/Madam,

Submission on the Te Tai o Poutini Plan (TTP)

Please find attached a submission from F T & J P Dooley on the Proposed Te Tai o Poutini Plan (TTPP).

As a general comment we believe the Plan has been rushed, has not been appropriately resourced and has too much emphasis on the future with no consideration for the impacts on existing infrastructure and property owners which is a fundamental breach of the Local Government Act 2002. If there has been any impact reports prepared we don't believe they are publicly available or readily accessible.

In our opinion, The Order in Council establishing the TTPP committee concentrated on positions rather than skill sets thus there is an urgent need for appropriate resourcing to fully review the proposed plan to ensure it represents the wishes of the Regions Landowners and is an enabling rather than restrictive document.

For the average landowner [including ourselves] this is a very complicated document and very difficult to use as an "on-line" tool if you a not computer literate.

I have read the submission made by Baseline Group on behalf of Frank O'Toole which I support and wish to speak to.

I have read the submission made by Landmark Lile on behalf of the O'Conor Institute Trust Board which I support and wish to speak to.

I have read the Submission made by Landmark Lile on behalf of Buller Electricity Limited which I support and wish to speak to.

We add the following comments.

COASTAL ENVIRONMENT

The overlay is far too extensive and the rules far too restrictive thus we submit this section needs to be rewritten to be more enabling of development.

REZONING

The rules appear to have been developed without any consideration to the impacts on existing property owners. The rules should only be considered where there is an overall plan that incorporates essential infrastructure including: Power supply; Sewerage reticulation; Stormwater; Fresh Drinking Water and Rooding. Thus, in our opinion there needs to be a substantial rewrite of these provisions.

Natural Hazard

41 Orowaiti Road and 24 Wakefield Street are in the Westport Hazard Overlay. The natural hazard objectives, along with policy NH-P13 has particular relevance. Activities within the Westport Hazard Overlay are then specifically regulated by rules **NH-R1** and **NH-R52**. The following submissions are made to the planning framework related to the Westport Hazard Overlay.

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1. **Westport Hazard Overlay.** The definition of the Westport Hazard Overlay is supported in principal and in particular, the reference to the area to “be protected”. But I submit that the protection works planned by the WCRC Long Term Plan will provide the level of mitigation required by the wider planning framework if amended to address in the specific matters raised herein. Thus, the definition of the Westport Hazard Overlay should be amended to read:
“This applies to the area certified by the WCRC as protected noting the impacts of climate change have been included in the design, development and implementation of the Westport Flood and Coastal erosion protection Scheme”.
It is also submitted that any reference to AEP and ARI be appropriately defined to avoid uncertainty and simplify the administration of the TTPP.
2. **Policy NH - P13.** The relationship of this policy with the protection to be provided by the WCRC Long Term Plan (via the **Westport Hazard Overlay**), and with **Policy NH – R52**, is unclear. It is assumed that the planning framework would require new development to mitigate against the Westport (flood) Hazard in advance of the protection provided by the WCRC being completed / certified. However, once the LTP protection is certified, it is also expected that no such mitigation would be required. As such, the relevant policies and rules should clearly set out those expectations, while also providing for ease of administration and interpretation. It is submitted that the current provisions will not lead to this outcome. Given the change requested to the definition of Westport Hazard Overlay, it is considered that clauses a, b and c within Policy NH - P13 should be deleted, or at least remove any uncertainty as to whether the planned LTP works will provide the stated level of protection.
- 3 **Rule NH – R1. Reconstruction and Replacement of Lawfully Established Buildings in all Natural Hazard Overlays.** The 2-year timeframe imposed within clause 3 of this policy is opposed. Two years is a very short timeframe for all design, consenting and construction to be completed. It is therefore requested that clause 3 be deleted and integrated into what is currently clause 4 with a timeframe of 10 years.
- 4 **Rule NH – R52. New Buildings and Additions and Alterations to Existing Buildings in the Westport Hazard Overlay.**

As set out under items above, it is considered that the purpose and intent of this rule needs to be clearly stated, so that it leads to clear interpretation that is easy to administer. The current rule does not clearly apply the ‘protection’ to be provided by the WCRC and applied to the rules within the Westport Hazard Area.

It is submitted that clause 1 need not contain the protection standard after the words ‘Westport Flood and Coastal Erosion Protection Scheme’ and before the words ‘as certified by the West Coast Regional Council’. It is requested that those works containing standard be deleted.

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