Te Tai o Poutini Plan Team
PO Box 66
GREYMOUTH 7840

Sent via email to: info@ttpp.nz

11 November 2022

Dear Te Tai o Poutini Plan Team,

Submission to proposed Te Tai O Poutini Plan | West Coast

This feedback is made on behalf of *submitter* in relation to the provisions of the proposed Te Tai O Poutini (the Proposed Plan) relating to subdivision and development of land for residential dwellings.

Contact details are as follows:

Name: THE CODA TRUST (68B HENLEY STREET, WESTPORT).

Ph: 0272457258

Email: brodiemabe@gmail.com

Address for Service: 89 SNODGRASS ROAD
WESTPORT, RD 2.

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.

Natural Hazards – Westport:

A special Westport Hazard Overlay is proposed, which covers much of the township of Westport and controlled by rules (NH - R52) that requires every dwelling in Westport to achieve a floor level above the combined sea level/flood level height including an additional 1 m for climate change. The effect of this is unreasonably high floor levels required.

Exceptions are made when flood protection achieving the same level of protection around Westport is implemented. Regional Council has been considering options for flood protection for some time, and its not certain when, or if flood protection measures will be created, or if they will achieve the

outcome required by rule NH – R52. In the mean time some properties are being built up to avoid flood risk to achieve different flood protection measures, depending on which level of protection is required at the time consents are approved. Those building consents approved recently are unlikely to meet the standards required by the proposed plan. Therefore, a peppered landscape is forming in Westport with properties raised to a variety of levels without any cohesion.

The proposal rules framework means any resource consent application to seek a lesser level than the high standard required will need to generate a massive amount of technical reports to demonstrate that risks from natural hazards are avoided as required in the objectives and policies framework. This makes getting a resource consent more difficult and costly.

Furthermore, there is no relief from rules around recession planes, or building setbacks that acknowledge if a site has to be built up to meet rule NH - R52. Therefore, a resource consent for general residential zone rules is required, often requiring written approval from neighbours, resulting in potential risks from hearings.

Changes requested:

The following changes are requested to give effect to the concerns raised above:

- Greater clarification/justification as to the extent of the flood hazard maps, including an independent peer review of the work to ensure it is fit for purpose.
- Reconsider the heights required in the short term (Rule NH – R52 (2)) reflecting heights building consents have been approved to recently, which is lower than that required by the rule.
- Confirmation as to the timeframe and extent of construction of flood protection measures required to achieve Rule NH – R52(1).
- Provide a mechanism to seek floor level heights, or minimum building platform heights associated with subdivision from District or Regional Council on a case by case basis, so expensive technical experts are not required every time someone wants to build a new house. Environment Canterbury provide a flood risk assessment with floor levels upon request, and a similar service should be available on the West Coast.
- Any consequential changes to give effect to this submission.

Regards

Signed L A Broderick Trustee -