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:	WICH	PEL		Surname	: 5N	OWDEN	,	
Are you sub	mitting as a	n individua	l, or on behalf of	an organisation?		Individual	Organis	ation
Organisatio	n (if applica	ble):						
Would you	gain an adv	antage in tr	ade competition	through this sub	mission?	Yes	No	
lf you could	l gain an ad	vantage in t	rade competitior	n through this sub	omission p	olease complete	the following	ı:
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Email:Mic	hael/	frowde	en e onen	Ch. 10.172 Phone:	02	1 889 7	59	
Signature:	Ma			Date:	11-11-	22		

Your submission:

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

	Strategic Direction		Energy Infrastructure and Transport	1	Hazards and Risks
/	Historical and Cultural Values		Natural Environment Values	V	Subdivision
1	General District Wide Matters		Zones		Schedules
	Appendices	1	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.ttpp.nz 0508 800 118



Submission on Te Tai o Poutini Plan (TTPP)

Provided Dr Michael Snowden
and Fellow Residents of the Okuru area

Contents

Historical and Cultural Values

High Coastal Natural Character

Hazards and Risks

Subdivision Rules

Significant Natural Areas

Submitter's Landholding

DOC Photograph of the Haast-Okuru Area

Historical and Cultural Values

- Sites of Significance to Māori
- Pounamu Management Areas

We have no issues with the proposed zoning relating to the above values. It is clearly understood that the historical and cultural values of Māori must be acknowledged.

As a recent applicant for a resource consent, we have offered acceptance of the accidental discovery protocol to go onto the consent as a condition, if granted. We consider that it is essential that Māori sites are preserved for future generations.

However, the predominant control in the area is SASM 197, which does not allow the removal of indigenous vegetation without prior approval.

It would appear that little consideration has been given to developing any precision in the SASM 197 layer for the Okuru area, as it is represented by a simple elliptically shaped area which does not differentiate between existing vegetation and pasture.

In our view, introducing such a broad brush layer has caused unnecessary angst and is likely to work against the objectives of the overlay.

The vociferous negative sentiment expressed by local landowners could easily have been mollified with more careful communication.

It certainly has not helped that the layer was placed as a horizontal object, rather than as a horizontal object, on the iso-map, nor that it has taken more than three months to correct it and communicate with landowners.

Submission:

More precise targeting of the scope of SASM 197 must be applied in the Okuru area.

Natural Environment Values

High Coastal Natural Character (HCNC)

We have a major issue in that the HCNC layer has been placed over our site, together with nine of the 18 lots recently subdivided to the southwest of our land and other farmland on the southwest area of the Okuru-Turnbull River.

 There is a great deal of Department of Conservation administered land in the immediate area, as well as on the West Coast as a whole, that cannot be built on or developed.

We submit that the HCNC status should be placed over the DOC-administered land and not on privately held land, and especially not over farmland.

- We have not received any communication to explain why our land, together
 with the nine lots to the southwest or other nearby farmland, have the
 HCNC layer imposed on them. We would like to be informed as to why the
 HCNC layer has been imposed.
- There is a nationwide shortage of residences, and especially so in this particular region of the West Coast. The HCNC layer represents just one more obstacle to seeking resource consent for a new dwelling. The net effect is protracted delays, additional cost, added complexity and greater uncertainty.
- The well-formed and sealed Haast-Jackson Bay Road borders our site and services are easily accessible. Therefore, ease of access for the landowner and residential activities to connect to services, as opposed to building on land which would otherwise require considerable roading construction and disturbance, or an extension of services, is a significant advantage in terms of reduced impact on the environment.
- Approximately 85% of our land, other than the smaller separate northern section, has been in paddocks for at least 70 years. Prior to our purchase of the property from LINZ in 1987, local farmers grazed cattle under license.
- The adjoining lots have flat bare paddocks and the HCNC layer is also imposed on substantial tracts of nearby existing farmland. This does not make any apparent sense to the landowners.
- It is difficult to comprehend how pasture can attain a High Coastal Natural Character status. It is developed land, as opposed to DOC-administered land, or privately owned land which is covered in indigenous vegetation.
- The effect of buildings in the HCNC area of the Turnbull and Okuru River mouths is considered on p701 of the TTPP under the Site Type and Values section.

This section states that: "A small bach community occupies much of the coastal shoreline and pasture though it does not disrupt the overall cohesion of natural elements which remain the dominant feature of this unit." (emphasis added)

Accordingly, it does not make any sense that the HCNC layer is imposed on private farmland.

- It is not clear at all, at present, to both council planners and independent town planning professionals acting for resource consent applications, what the HCNC actually means. No prescriptive operating rules are provided that allow landowners to assess the impact of the HCNC layer on their land.
- The land is owned in fee simple and we pay rates to the WDC. In our view, we should be able to build on our land, taking the coastal area into account, which the other proposed TTPP layers do.
- However, the HCNC layer should not be on our privately-owned land. It is a hindrance and we strongly object to it.
- This land, together with the nine lots to the southwest and other farmland to the southwest, should not have the HCNC layer over it, and we strongly support any other person who owns private land and has this layer on it, to object.

Submission:

Remove the HCNC from privately held farmland.

Questions to be Answered by the WCRC:

- How was the decision made to impose the HCNC layer on our land and the adjoining lots, and who, or what panel, decided to impose it? What was the decision criteria?
- Why has the HCNC layer been imposed on long-standing bare farm paddocks?
- What reports were carried out to support the decision made? The affected landowners are entitled to view this documentation and we request that it be provided forthwith.

Hazards and Risks

Flood Plain

There is a flood plain layer over the entire site. The flood plain layer extends over the majority of the low-lying adjoining area.

It is puzzling to note that there is neither a Flood Hazard Susceptibility nor a Flood Hazard Severe zone in the general area. Floods have occurred in the area for millennia as the Haast plain has been formed and extended from the main divide since the retrenchment of the last ice age.

Over the previous 150 years or so of European settlement floods have been a regular occurrence in the area.

It seems incongruous that a flood layer has been placed on many properties, but no controls have been provided.

Coastal Hazards

The Regional Policy Statement's key objective is that:

"People are at the heart of this RPS. All district and Regional Plans should have regard to people and communities and their need for a healthy environment, well managed infrastructure, employment, business opportunities and education for their wellbeing and long-term success."

Other salient extracts from the Rural Zone Objectives include:

- Allowing settlements to grow and adapt as economic activity changes.
 RURZ 03 (b)
- To support the expansion of existing settlements and necessary infrastructure in areas at low risk of natural hazards, and implement hazard management to reduce the risk where existing development is located in high risk locations. RURZ 04

Further relevant extracts from the Rural Zones Policies follow:

- Provide for growth and change to settlements that:
- Improves the long-term viability of the settlements and their communities. RURZ P2(a)
- Provides new housing opportunities in locations that are away from significant risks to life, safety and property damage from natural hazards.
 RURZ - P2 (c)

In general, it is now accepted that climate change, rising sea levels and disruptive weather patterns are the norm.

Submission:

The specific application of the Coastal Hazard Severe and Coastal Hazard Alert zones over most of the Okuru area is wrong and has been misapplied for several reasons, as described further below.

The inappropriate hazard zones must be remedied in the context of the following supporting information.

1) "Hidden" NIWA Report - Breach of Natural Justice

The West Coast Regional Council commissioned NIWA to prepare a report on likely coastal hazards, namely, storm inundation and erosion, for selected areas of the West Coast to help inform the WCRC in its preparation of the TTPP.

This report was published in March 2022. It is noteworthy that this report is not on the WCRC website, or it is obscured somewhere. The report is not, to our knowledge, referenced at all within the TTPP.

In addition, the West Coast District Council is currently using information contained within the NIWA report to assess resource consent applications, even though locally based professional engineers and town planners were not previously aware of its existence.

This is, in our view, a breach of natural justice. Critical planning information has not been publicised to professionals acting on behalf of the public, while the WDC is using that information in its own assessments.

2) Conflicts of Planning Time Horizons

There would appear to be conflicts between different planning time horizons. That is, we understand that authorities granting resource consents are protected by a statutory bar on liability for negligence after ten years from the date of issue. If so, that should, in our view, be the dominant timeframe for assessment.

Provided the landowner is aware of the hazard risks, they can make their own determination as to whether to build. Other contributing factors would, of course, include access to mortgage finance and insurance, but that burden remains with the landowner in any event.

Secondly, we understand that the Building Act requires dwelling structures to last for at least 50 years. It says nothing about lasting for 100 years.

Why have the hazard controls been implemented on the basis of the 100 year erosion line, as determined by NIWA?

3) Social and Financial Impact on Okuru Residents

The imposition of the two natural hazard zones across wide swathes of the Okuru area has had profound negative social impacts.

The unfortunate depiction of the Coastal Hazard Severe as a "red zone" carries with it the unhelpful connotation of the Christchurch "red zone", with no prospect of building, as we understand it.

While exceptions have been provided in the zone rules, the communication to landowners has led to feelings of despair, anxiety, distress and hopelessness.

The imposition of a "red zone" has far reaching implications for landowners as banks and insurance companies accept the lines drawn on the zone perimeters as a matter of certainty, rather than through a nuanced and site-specific evaluation that should be made.

The consequences of the likely institutional response will be either depopulation in the community or have the effect of trapping residents into their existing situations.

As property values fall for the above reasons, current landowners will likely have great difficulty in selling and being able to afford new dwellings in other higher priced areas.

This outcome is directly in conflict with the stated objectives and policies of the TTPP, as quoted above.

In this particular area of the West Coast, DOC administers almost all of the land. Very little residential land is currently available for constructing new dwellings.

The absence of support for new subdivisions is also in conflict with RURZ-P2.

4) Validity of the NIWA Report

We respectfully submit that, in our view, the NIWA report is based on an arguably flawed methodology, which has led to a misapplication of the natural hazard rules within the Okuru area.

We would be pleased to further elaborate on this assertion at an appropriate public hearing regarding the TTPP. The key reasons follow:

i) Unique Geographic Situation

The Okuru-Turnbull estuary is relatively unique in the sense that the two major rivers have created a pronounced salient into the sea. This is illustrated in the attached DOC photo.

The salient is also clearly prominent in surveyed maps of the area, dated 1875 and 1884. We understand that there are no other comparable river salients of this scale in New Zealand.

The sand spit, extending over several kilometres, provides protection from erosion by providing a barrier against wave action, unlike the Haast Beach area, the area south of Hannahs Clearing and Neils Beach.

The NIWA report largely combines all these disparate areas into one for the purpose of assessing the impact of erosion.

The DOC photo attached provides an excellent perspective of how the Haast plain in the Okuru area has been formed. The curving internal lakes and sand dunes reflect the enormous forces of river movement, sediment deposits, sea current pressures and the impact of frequent minor earthquakes.

As noted elsewhere, the sea lapped against the foot of the main divide at the conclusion of the last ice age. High altitude annual rainfall of 5m to 7m per annum, on to massive watershed areas within the Okuru and Turnbull valleys, together with seasonal ice melts, create powerful rivers which move at a rapid pace over a short distance of around 15 km to the sea, carrying enormous volumes of sediment to the sea.

Over time, literally millions of cubic meters of sediment have been deposited in the sea. The Okuru salient is the most striking example of this natural phenomena in New Zealand.

The river and sediment flows have coalesced on the Okuru salient. This effect has also been enhanced by the northerly current carrying sediment from the two major rivers to the south, namely, the Arawhata and Waiatoto.

The critical point here is that, contrary to the NIWA report's findings, in our view, the Okuru-Turnbull rivers are in a constant state of accreting sediment in and around the sand spit.

ii) Erosion in the Okuru Area is Largely Caused by River Action Within the Estuary, Not Sea Wave Action

The erosion identified in the NIWA report, with respect to the majority of the land covered by the two hazard zones, is influenced strongly by river action within the estuary, rather than attributable to direct ocean wave action.

The periodic shifting of the river outlet from northeast to southwest aggravates the internal estuary erosion effects.

Mitigation actions are available to counter this effect, including the recent granting of a resource consent to open a channel on the sand spit directly in front of the main river channel.

In prior years, this strategy was followed with great success, and the current resource consent will allow this mitigation process to take place whenever it is required.

When this strategy is employed during river flood conditions, the rivers will exit the estuary with much less impedance, thereby relieving erosion pressure within the estuary.

iii) Any Prediction 50 or 100 Years Into the Future is Bound to be Wrong

The NIWA report has been prepared using a "hybrid-probabilistic approach". This means that the report writer has considered available data and extrapolated that data 50 and 100 years into the future. The writer has also applied "expert judgement" to account for gaps in the data.

While this methodology sounds impressive, the essential problem is that all predictive mathematical models are an abstract of reality and can only ever provide indicative guidance, rather than a prescriptive or deterministic outcome.

A second problem with this approach is the validity of the assumptions about the behaviour of natural forces and the data sources used.

The critical point is that any forecast made for 50 or 100 years into the future is fraught with uncertainty and will almost certainly always be wrong.

Forecasting the interaction of inherently unpredictable sea level changes, river flows, ice melt patterns, sediment deposits, wave current strength and direction, sea temperatures, weather patterns and a multiplicity of other natural phenomena, even for a short time horizon term will simply provide a result with a low confidence level.

When considering a 50 or 100 year prediction timeframe, the reliability of any single point in a forecast, as the red dots or TTPP map lines represent, is near zero.

Of course, the pages of history are replete with examples of long-term predictions that have failed miserably in their efficacy.

While there is largely undeniable evidence regarding climate change, it should also be recognised that many assumptions made by UN forecasters, for example, have now been discredited, so all data needs to be interpreted carefully.

iv) The NIWA Report is Precisely Wrong, Rather than Roughly Right

The TTPP has largely adopted the NIWA report for the Okuru area as if the forecasts were set in stone. For example, a dotted red line across the Okuru area designates the 100 year erosion line. However, every dot on the line represents a series of probability curves, rather than a certain event.

That is, any single red dot on a map effectively represents the aggregation of a series of probability distributions for each point in time over 36,500 days, in the case of a 100 year forecast.

There is an illusion of precision inherent in the NIWA red dotted line, as well as the placement of the TTPP natural hazard zones.

Only a single point estimate is provided by virtue of the dotted red line, or a straight zone line on a planning map, rather than recognising the inherent uncertainty in any point.

The effect of this situation is that council planners, when assessing a resource consent application, are likely to slavishly follow the dots, rather than apply discretion, given the uncertainty of what will happen.

There must be a recognition by consenting authorities that natural hazard forecasting can only ever be "roughly right, not precisely wrong".

v) The NIWA Report Did Not Include Any Consultation With Local Landowners

The report states that it was prepared with "expert judgement". While not questioning the qualifications of the writer or casting aspersions in any form in this regard, it would appear that no consultation was made with residents in the area, many of whom have lived as multi-generational families over a 150 year span of time, experiencing all forms of weather patterns.

For example, a recent event within the past 10 years is illustrative of this point. When the combined Okuru-Turnbull river changed direction from the northeast to the southwest, the river channel to the northeast filled with sand and it was possible to walk 300m to the breaker line, exactly where the NIWA report defines an area that will be entirely eroded, in their opinion.

vi) The NIWA Report Did Not Consider Risk Mitigation Opportunities

The NIWA report makes clear that the forecasted inundation and erosion effects have been determined in the absence of any potential mitigation investment.

A recent example of a successful mitigation investment was the construction of a rock groyne on the northeast bank of the Okuru River over 30 years ago, to prevent it cutting across the dwellings located in Johnston Crescent.

This mitigation investment was funded entirely by a dedicated local area rating zone and has proved to be effective.

vii) The Imposition of Natural Hazard Zones Has Created Unnecessary Negative Social and Economic Distress

The imposition of the natural hazard zones across broad swathes of the Okuru area will have a chilling effect on the local economy. Residents are unlikely to make new investments in their properties. Bank funding will become scarce or unattainable. Insurance cover may be impossible to secure. Business confidence will plummet.

Depopulation will accelerate with few alternative building sites in the area. Residents' equity in their properties will collapse and they will likely find

themselves in an economic trap, unable to move away as the value of their property will decline precipitously, if it were saleable at any price.

viii) The Natural Hazard Zones Conflict With The TTPP's Policies and Objectives

The relevant declared statement of objectives follows:

To support the expansion of existing settlements and necessary infrastructure in areas at low risk of natural hazards, and

implement hazard management to reduce the risk where existing development is located in high risk locations. RURZ - 04 (emphasis added),

It is clear that the TTPP is completely silent on any prospective mitigation strategy to deal with this matter.

As noted above, the Regional Policy Statement states that:

"People are at the heart of this RPS. All district and Regional Plans should have regard to people and communities and their need for a healthy environment, well managed infrastructure, employment, business opportunities and education for their wellbeing and long-term success." (emphasis added)

The TTPP plan, with respect to the Natural Hazard zones within the Okuru area, are based on a NIWA report which, in our view, employs a very questionable methodology and provides unsafe conclusions.

The impact of this has been to impose significant emotional and financial stress on the affected residents across the Okuru area, without sufficient regard to the need for a nuanced approach or any mitigation factors.

Submission:

We submit that the TTPP could address the severely negative impact of the natural hazard overlays on the community of Okuru residents, and others, of course, with the following mitigation solutions:

i) Introduce More Certainty into the Consenting Process

Uncertainty is a real problem and anything that can reasonably be done, will improve business confidence, reduce emotional distress and help to maintain a cohesive community.

Several proposed solutions follow:

Provide prescriptive definitions of alternative and acceptable building models. For example, foundations on poles, say, 1.2m meters above original ground level, engineered to a particular standard.

Removeable dwellings for translocation in the event of erosion. Almost all dwellings can be removed, especially north of the Waiatoto River bridge.

This would create a design "safe harbour" for residents seeking approval for a new dwelling, and reduce compliance costs for council and applicants.

Engage professional engineers to design an acceptable solution for the foundations required for existing dwellings to be raised by, say, 1.2m, taking into account the underlying terrain.

The use of wooden poles, engineered with bracing to withstand reasonable flooded river flow pressures, would be cost-effective, compared to the alternatives of abandonment.

This would provide lower costs and faster consenting processes for existing dwelling owners to take mitigation steps against future flooding events.

In addition, consenting authorities could allow any HIRB constraints to be waived for this purpose.

This would mean that the dwelling owners' equity could be preserved, at relatively low cost. The expansion of services to the dwelling would not exceed, say, 1.5m and all wastewater and freshwater provisions would remain intact.

A key benefit of this approach is that residents would be able to remain in the community they currently enjoy.

ii) Ensure Consenting Authorities Accept the Inherent Uncertainty of Natural Hazard Forecasts

Allow consenting authorities more discretion in applying the hazard zones to take into account nuanced situations of specific sites, rather than the slavish application of an essentially arbitrary line on a map.

Ensure consenting authorities accept the inherently uncertain nature of inundation and erosion forecasts and allow a tailored approach, when it is deemed appropriate.

iii) Remove Unnecessary Emotive Triggers from the TTPP and Council Communications

Remove all references to a "red zone", to remove or reduce the extremely negative emotional connotations of the term.

iv) Adopt a More Realistic Planning Timeframe

Adopt a more realistic timeframe for new dwellings, rather than a strict "keep behind the red dotted line or erosion will destroy the land within 100 years" approach.

v) Actively Seek Mitigation Strategies in Partnership with the Community

Actively engage with local communities to seek a council-community partnership solution to the mitigation of specific local hazard threats. This may include a 100% community-funded local rating fund or a joint investment programme.

Subdivision Rules

We object to the new subdivision rules reducing the minimum lot size to 4ha, from the current .5ha in the Rural Zone. The reasons for our objection follow:

Inefficient Use of Land

Increasing the minimum lot size by a factor of eight will be a significant misallocation of scarce land resource available for building new dwellings.

The proposed minimum lot size of 4ha is not big enough to be useful in a productive sense, while it will consume far more scarce land resource than is necessary to achieve the objectives of the TTPP.

Judicious planting on bunds surrounding any subdivision will help to protect visual amenity and, if planted in indigenous vegetation, add considerably to the natural landscape.

Wastewater and freshwater resource requirements are usually easily dealt with on-site, and the distance of each dwelling from others is, in our view, quite appropriate for the rural zone, especially with suitable indigenous planting.

The West Coast Urgently Needs More Building Sites

There is a growing requirement for more buildable sections in most areas of the West Coast. The overwhelming predominance of DOC-administered land, combined with an urgent requirement to retreat from low-lying areas which are facing growing threats from natural hazards, dictates a more enlightened approach.

The number of potential new building sites will also be reduced while the cost per lot will increase proportionately, if this proposed change is adopted.

If the minimum lot size were to increase eight-fold, applicable to the remaining and declining areas of "high ground", the inevitable consequence will be depopulation.

The inevitable outcome of depopulation is, of course, directly in conflict with the TTPP's objectives and policies.

Submission:

Either keep the existing minimum lot size as is, or only double it to 1ha per lot.

Significant Natural Areas

It is clearly disconcerting to landowners in the Westland District, and presumably landowners in the Buller District, that there are no details provided in the TTPP on the areas proposed to be designated as SNAs.

Schedule Four simply states that "an assessment of significance will be undertaken at the time any resource consents are applied for in relation to the Ecosystems and Biodiversity Rules.

In our view, this is not acceptable. How can landowners effectively plan for the future of their farming businesses with such scant guidance?

The Grey District has made an exemplary effort to fully document applicable SNA areas.

It is recognized that considerable effort and expenditure is required to prepare such a definitive list, but we consider that a simple dismissive statement is very unhelpful to the affected landowners.

Furthermore, the imposition of a SNA area without any consideration being offered in exchange is, in our view, expropriation of private property.

Each landowner is prevented from dealing with his or her asset as they see fit. There is no proposed rates abatement for the affected SNA land. They do not even know what land may be affected without incurring considerable expense. In our view, this is unacceptable.

Conversely, there is, in our view, a general appreciation among landowners of the value of this type of preservation of significant natural areas.

We consider that the following submission may contribute to a more supportive attitude among landowners.

Submission:

i) Introduce a Rates Abatement Policy

Develop a rates abatement policy for SNAs. It may not need to be for a precise pro rata sum, as the rating value on undeveloped land, as opposed to pasture, should be relatively low.

In our view, even a reasonable gesture to a rates abatement policy would go a long way to gaining moral support from the affected landowners for the imposition of SNAs on their private land.

ii) Provide Support for Fencing Off SNAs

Consider providing financial assistance for the fencing off of SNAs. Excluding stock will, of course, help to preserve the integrity of the natural asset.

iii) Encourage Landowners to Consider QE II Covenants

Encourage landowners to explore the societal and personal benefits of creating QE II covenants over all or some of the SNAs. There are many very successful examples of QE II covenants established by farmers since its inception in 1977, with over 5,000 currently registered over New Zealand.

iv) Develop a Policy for Land Swaps Between Low-Value DOC Land and High-Value SNA Land

In the Haast-Okuru district, DOC land holdings dominate the area. However, many DOC-administered land holdings have relatively low intrinsic ecological value, and are either currently grazed under license, or could be.

Our proposal is that landowners may be quite willing to swap areas designated as SNAs with those relatively low ecological sites controlled by DOC.

Obviously, there are statutory obligations to factor into the discussion, but we consider that the West Coast regional authorities could be very effective in orchestrating a policy in these broad terms. The outcome could be very beneficial for society in general, the local community, as well as for the affected landowners.

If you require any further information, please contact me by email.

I do wish to speak to my submission. I would not gain an advantage in trade competition through this submission.

Dr Michael Snowden

November 11, 2022

Submitter's Land Ownership

Land Appellation

Lot 5 DP3034 and Section 6 SO11816 (both allotments are listed on the same Record of Title WS8A/1043).

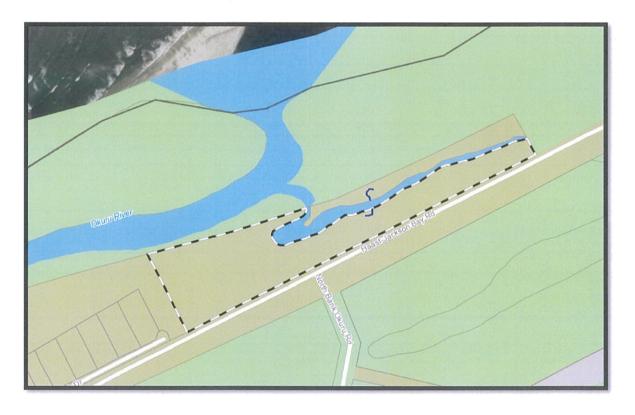
Address

There is no current number as it does not have a dwelling on it. The land is on the Haast-Jackson Bay Road, Okuru. The allotment is outlined with the black and white line, while the small blue vernacular ("s" shape) indicates that the other small lot to its north is also part of the same Record of Title.

Ownership History

The land is legally owned by Kahu Properties Limited which is, in turn, owned by our family trust. The land was purchased from LINZ in 1987, over 35 years ago.

A resource consent application for a dwelling and shed was filed recently, which has compelled a close reading of the TTPP and its impact on our land and the local district.



Zoning

The proposed zoning for the site is the "**General Rural**" zone, with no precincts over the land. We have no issues with the proposed zoning relating to the "General Rural".



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Your details:

First name: MICHAEL	Surname:	SNOWDEN	
Are you submitting as an individual,	or on behalf of an organisation?	Individual Or	ganisation
Organisation (if applicable):			
Would you gain an advantage in tra	de competition through this submis	ssion? Yes No	
If you could gain an advantage in tra	ade competition through this submi	ssion please complete the follo	owing:
l am /am not directly affects affects the environment; and (b) doe	ed by an effect of the subject matter es not relate to trade competition or		
Postal address: Po Box	46068, HERNE B	say, Anckland	1011
	1.60.112		
Email: Michael frowde	reonere Phone:	021 889 759	
Signature:	Date:	-11-22	
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Your submissio	n:		
The specific provisions of the propo	osal that my submission relates to a	re:	
Strategic Direction	Energy Infrastructure and Tran	nsport Hazards and Risk	S
✓ Historical and Cultural Values	Natural Environment Values	Subdivision	
✓ General District Wide Matters	Zones	Schedules	
Appendices	✓ General feedback		
All submitters have the opportunity Hearings are anticipated to be held			
I wish to speak to my submission	l do not wi	ish to speak to my submission	
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Want to know more? www.ttpp.nz

Yes, I would consider presenting a joint case



No, I would not consider presenting a joint case