

Please find attached my submission to the proposed TTPP.

SUBMITTER DETAILS	
First name	Steve
Last name	Crossdale
Are you submitting as an individual, or on behalf of an organisation?	Individual
Organisation (if applicable)	
Would you gain an advantage in trade competition through this submission?	No
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OUR SUBMISSION	
The specific provisions of the proposal that my submission relates to are	<ul style="list-style-type: none">• Strategic Direction• Energy Infrastructure and Transport• Hazards and Risks• Historical and Cultural Values• Natural Environment Values• Subdivision• General District Wide Matters• Zones• Schedules• Appendices• General feedback
Do you wish to speak your submission?	Yes
Would you consider presenting a joint case?	Yes

Stephen Croasdale Submission on Proposed Te Tai o Poutini Plan

My submission explicitly extends to include any other related provisions in the plan touched on in my submission and/or concerning my submission or relevant to the matters raised in my submission. I wish to speak to my submission. I will consider presenting a joint case if others make a similar submission. I would not gain an advantage in trade competition through this submission.

PART 1 – INTRODUCTION AND GENERAL PROVISIONS

INTERPRETATION

Definitions

Plan Provision	Support/Oppose	Reasons	Decision Sought
New definition	-	I believe that there needs to be a clear definition for “offensive industries”.	Develop a suitable definition for “offensive industries”.
New definition	-	I believe that there needs to be a clear definition for “hazardous facilities”.	Develop a suitable definition for “hazardous facilities”.
New definition	-	I believe that there needs to be a clear definition for “woodlot”.	Develop a suitable definition for “woodlot”.
New definition	-	I believe that there needs to be a clear definition for “shelterbelt”.	Develop a suitable definition for “shelterbelt”.

PART 2 – DISTRICT-WIDE MATTERS

STRATEGIC DIRECTION

Plan Provision	Support/Oppose	Reasons for the Submission	Decision Sought
Strategic Directions Overview	Support	I support the Strategic Directions Overview.	Retain as notified
AG – O1-O2	Support	I support the various Strategic Objectives and Policies.	Retain as notified
CR – O1-O4			
MIN – O1-O6			
NENV – O1-O4			
POU – O1-O4			
POU – P1-P10			
TRM – O1			
UFD – O1			

HAZ - HAZARDS AND RISKS

NH - Natural Hazards

Plan Provision	Support/Oppose	Reasons	Decision Sought
NH – O1-O6	Support	I support these objectives.	Retain as notified
NH – P1-P14	Support	I support these policies.	Retain as notified.
NH – R38	Oppose in part	Two and five years is an insufficient length of time for reconstruction/replacement.	Amend rule so that there is a <u>ten-year</u> period within which lawfully established buildings can be reconstructed/replaced in <u>all Coastal hazard overlays</u> .
NH – R39	Support	I support this rule.	Retain as notified.
NH – R40	Oppose in part	Point two in this rule is too restrictive.	Delete point 2.
NH – R41	Oppose in part	Activity status where compliance is not achieved is too restrictive for Coastal Hazard Alert overlay.	Amend activity status where compliance is not achieved for Coastal Hazard Alert overlay from Discretionary to Controlled or to Restricted Discretionary.
NH – R42	Oppose in part	Matters to which discretion is restricted should be similar to NH – R11.	The matters to which discretion is restricted should be amended to similarly reflect NH – R11: <ul style="list-style-type: none"> a. <i>Whether there is a functional or operational need for the facility to be located in a Coastal Severe and Coastal Alert Overlays area;</i> b. <i>The effects of natural hazards on people and property;</i> c. <i>The location and design of proposed sites, buildings, vehicle access, earthworks and</i>

			<p><i>infrastructure in relation to natural hazard risk;</i></p> <p><i>d. Any freeboard requirements to be included;</i></p> <p><i>e. The management of vegetation or other natural features to mitigate natural hazard risk;</i></p> <p><i>f. The timing, location, scale and nature of any earthworks in relation to natural hazard risk;</i></p> <p><i>g. The potential for the proposal to exacerbate natural hazard risk, including transferring risk to any other site.;</i></p> <p><i>h. How the activity incorporates mitigation of risk to life, property and the environment; and</i></p> <p><i>i. Any adverse effects on the environment of any proposed natural hazard mitigation measures.</i></p>
NH – R43	Support	I support this rule.	Retain as notified.
Westport Hazard Overlay and associated Natural Hazard and Subdivision objectives, policies and rules.	Oppose in part	This overlay is inappropriate. Associated provisions take an excessively restrictive approach to hazard management and mitigation.	Amend overlay and amend associated objectives, policies and rules to be more enabling of development.

HCV - HISTORICAL AND CULTURAL VALUES

Sites and Area of Significance to Māori

Plan Provision	Support/Oppose	Reasons	Decision Sought
SASM – P14	Support	I support this policy.	Retain as notified.
SASM – P15	Support	I support this policy.	Retain as notified.
SASM – R2-R5	Support	I support this rule.	Retain as notified.
SASM – R6	Oppose in part	I am concerned about the uncertainty around this rule and how restrictive it is for my property.	Consider amending to be more enabling.
SASM – R12	Oppose in part	I am concerned about the uncertainty around this rule and how restrictive it is for my property.	Amend to Controlled or Restricted Discretionary.
SASM – R13	Oppose in part	I am concerned about the uncertainty around this rule and how restrictive it is for my property.	Amend to Controlled or Restricted Discretionary.
SASM – R15	Oppose	Too restrictive.	Delete or amend to Discretionary.
SASM – R16	Oppose	Too restrictive.	Delete or amend to Discretionary.

NATURAL ENVIRONMENTAL VALUES

ECO - Ecosystems and Indigenous Biodiversity

Plan Provision	Support/Oppose	Reasons	Decision Sought
ECO – O1-O4	Support	I support these objectives.	Retain as notified.

ECO – P1	Support in part	<p>I support that areas of significant indigenous vegetation and fauna habitat will be identified through the resource consent process until such time as district wide identification and mapping of significant natural areas is undertaken in an appropriate and consultative way and that a formal Plan Change occurs after that time.</p> <p>I support this policy in principle. I believe that a June 2027 deadline is too ambitious to undertake the work in a way that sufficiently involves landowners.</p>	<p>Amend point 2. iii. as follows:</p> <p><i>Buller and Westland district wide assessment, identification and mapping of significant natural areas will be undertaken and completed by June 2027; and</i></p>
ECO – P2	Oppose in part	<p>The term “functional need” does not go far enough in recognising that some activities are required to operate in certain areas.</p>	<p>Amend point d. as follows:</p> <p><i>The activity has a functional, <u>technical, operational or locational</u> need to be located in the area;</i></p>
ECO – P3	Support	<p>I support this policy.</p>	<p>Retain as notified.</p>
ECO – P6	Support in part	<p>I believe that some of the terms used in this policy need defining.</p>	<p>Define the technical ecological terms used in this policy.</p>
ECO – P7	Support in part	<p>I support that this policy provides for consideration of “the appropriateness of any biodiversity offsetting or compensation in accordance with Policy 9 to offset any residual adverse effects that remain after avoiding, remedying and mitigating measures have been applied.”</p> <p>However, there could be significant adverse effects as a result of SNA mapping if the fixed location of mineral deposits is not provided for in the policy and the temporary nature of mining is not recognised.</p>	<p>Retain point h.</p> <p>Amend to recognise that, in some instances, vegetation clearance is unavoidable (e.g. in the case of accessing mineral resource) but that these effects can be temporary due so subsequent restoration processes.</p>
ECO – P8-10	Support	<p>I support these policies.</p>	<p>Retain as notified.</p>
ECO – R1-R3	Oppose in part	<p>I believe this is too restrictive.</p>	<p>Amend to be more enabling of development.</p>

ECO – R4/ SUB – R7	-	Refer to SUB – R7 below.	-
ECO – R5	Oppose in part	I believe this is too restrictive.	Amend to be more enabling of development.
ECO - R6/ SUB - R9	-	Refer to SUB – R9 below.	-
ECO – R7	Oppose in part	I believe this is too restrictive.	Amend to be more enabling of development.
ECO - R8/SUB - R15	-	Refer to SUB – R15 below.	-
ECO - R9/SUB - R27	-	Refer to SUB – R27 below.	-
ECO – R10- R11	Support	I support these rules.	Retain as notified.

NFL - Natural Features and Landscapes

Plan Provision	Support/Oppose	Reasons	Decision Sought
NFL – R14- R15	Support	I support this rule.	Retain as notified.

PA - Public Access

Plan Provision	Support/Oppose	Reasons	Decision Sought
Pre-objective discussion	Support	I support the discussion in the PA chapter preceding the objective.	Retain as notified.
PA – O1	Support	I support this single objective	Retain as notified.

SUBDIVISION

SUB – Subdivision

Plan Provision	Support/Oppose	Reasons	Decision Sought
SUB – R6	Oppose in part	We support this rule in principle but believe some amendments are necessary.	Amend to be less restrictive.
SUB – R7/ECO – R4	Oppose in part	We support this rule in principle but believe some amendments are necessary.	Amend to be less restrictive.
SUB – R9/ECO - R6	Oppose	This is too restrictive.	Delete points 2 and 3.
SUB – R10	Support	We support the provision.	Retain as notified.
SUB – R13	Support	We support the provision.	Retain as notified.
SUB – R15/ECO – R8	Oppose	This is too restrictive.	Delete points 1 and 2. Amend “Non-complying” to “N/A” under “Activity status where compliance not achieved”.

SUB –R16	Oppose in part	Status where compliance is not achieved is too restrictive.	Amend “Non-complying” to “N/A” under “Activity status where compliance not achieved”.
SUB – R17	Support	We support the provision.	Retain as notified.
SUB – R23	Support	We support this provision.	Retain
SUB – R24- R25	Oppose	We do not support this provision.	Delete.
SUB – R27/ECO – R9	Oppose	We do not support this provision.	Delete.
SUB – S1	Oppose in part	The minimum lot sizes for the General Rural Zone and Rural Lifestyle Zone are too large.	Amend General Rural Zone minimum lot size to 1 hectare. Amend Rural Lifestyle Zone minimum lot size to 0.5 hectare/5000m ² .

GENERAL DISTRICT-WIDE MATTERS

Coastal Environment

Plan Provision	Support/Oppose	Reasons	Decision Sought
Coastal Environment Overlay	Oppose in part	This overlay is far too extensive. The extent inland that the overlay covers is inappropriate and will unduly restrict development.	Amend and reduce the inland extent of the Coastal Environment Overlay.
CE – O1-O2	Support	I support these objectives.	Retain as notified.
CE – O3	Support in part	The term “functional need” does not go far enough in recognising that some activities are required to operate in the coastal environment e.g. due to the location of mineral deposits.	Amend as follows: <i>To provide for activities which have a functional, technical, operational or locational need to locate in the coastal environment in such a way that the</i>

			<i>impacts on natural character, landscape, natural features, access and biodiversity values are minimised.</i>
CE – P1	Support	I support this provision.	Retain as notified.
CE – P4	Support in part.	I believe this policy needs amending.	Include a point c. that provides for activities which have a functional, technical, operational or locational need to locate in the coastal environment.
CE – P5	Support in part.	I support this provision but believe this needs amending.	Amend point d. as follows: <i>Have a functional, technical, locational or operational need to locate within the coastal environment.</i>
CE – P6	Support	I support this provision.	Retain as notified.
CE – R1	Support	I support this provision.	Retain as notified.
CE – R2	Support	I support this provision.	Retain as notified.
CE – R4	Oppose in part	The maximum height limit of buildings and structures should be that specified for the particular zone. The gross ground floor area is too restrictive and should revert to zone rules.	Delete point 2. a. i. Delete point 2. a. iii.
CE – R5-R12	Oppose in part	I believe this is too restrictive.	Amend to be more enabling of development.
CE – R14-R19	Oppose in part	I believe this is too restrictive.	Amend to be more enabling of development.
CE – R21	Oppose in part	I believe this is too restrictive.	Amend to be more enabling of development.

EW – Earthworks

Plan Provision	Support/Oppose	Reasons	Decision Sought
EW – O1	Support	I support the objective.	Retain as notified.
EW – P1-P4	Support	I support the policies.	Retain as notified.
EW – R2-3	Oppose in part	Earthworks rules are difficult to understand in the way they are currently structured. I believe these rules are too restrictive.	Amend to be more enabling of development and provide more clarity.
EW – R6-R8	Support	I support the rules.	Retain as notified.

LIGHT – Light

Plan Provision	Support/Oppose	Reasons	Decision Sought
LIGHT – O1	Support	I support the objective.	Retain as notified.
LIGHT – P1	Support	I support this policy.	Retain as notified.
LIGHT – P2	Support in part	I believe that this policy should extend to appropriate lighting of outdoor commercial/industrial activities.	Amend to include the enabling of artificial outdoor lighting that allows safe commercial and industrial activities.
LIGHT – R1-R4	Oppose	These rules are too complicated and restrictive.	Amend significantly to reduce complexity and be more enabling of development.

PART 3 – AREA-SPECIFIC MATTERS

ZONES

Rural Zones

RURZ – Rural Zones – Objectives and Policies

Plan Provision	Support/Oppose	Reasons	Decision Sought
RURZ O1-O6	Support	I support these objectives.	Retain as notified.
RURZ P1 – P12	Support	I support these policies.	Retain as notified.
RURZ P15 – P28	Support	I support these policies.	Retain as notified.

GRUZ – General Rural Zone

Plan Provision	Support/Oppose	Reasons	Decision Sought
General Rural Zone	Oppose in part	I oppose my properties, Lot 1 DP 450105 and Lot 2 DP 450105 (i.e. 115 Okari Road, Cape Foulwind), being included in the General Rural Zone. It is more appropriately zoned Rural Lifestyle Zone.	Amend so that my property is zoned Rural Lifestyle Zone.

GRUZ – R1-R3	Support in part	However, pre-existing non-compliance with points 1, 2, 3 and 4 should be recognised as being acceptable for the application of the rule.	Amend so that existing non-compliance with points 1, 2, 3 and 4 of does not preclude the application of this rule.
GRUZ – R5	Oppose in part	I believe this rule should be simplified. Additionally, pre-existing non-compliance with points 1, 2, 3 and 4 should be recognised as being acceptable for the application of the rule.	Simplify the rule and/or amend so that existing non-compliance with points 1, 2, 3 and 4 of Rule GRUZ – R1 does not preclude the application of this rule.
GRUZ – R6	Support	I support this rule.	Retain as notified.
GRUZ – R8-R10	Support in part	I support this rule in principle. However, pre-existing non-compliance with Rule GRUZ – R1 should be recognised as being acceptable for the application of the rule.	Amend so that existing non-compliance with points 1, 2, 3 and 4 of Rule GRUZ – R1 does not preclude the application of this rule.
GRUZ – R12	Oppose in part	I support this rule in principle but believe that Transport Performance Standards and rules relating to light need to be amended before this rule is acceptable. I believe the rule is also too restrictive.	Improve the Transport Performance Standards and rules relating to light that connect to this rule. Amend to be more enabling of development.
GRUZ – R16-R17	Support in part	I support this rule in principle. However, pre-existing non-compliance with Rule GRUZ – R1 should be recognised as being acceptable for the application of the rule.	Amend so that existing non-compliance with points 1, 2, 3 and 4 of Rule GRUZ – R1 does not preclude the application of this rule.
GRUZ – R18	Support in principle	I support in principle.	Retain as notified.
GRUZ – R20-R22	Support in part	I support this rule in principle. However, pre-existing non-compliance with Rule GRUZ – R1 should be recognised as being acceptable for the application of the rule.	Amend so that existing non-compliance with points 1, 2, 3 and 4 of Rule GRUZ – R1 does not preclude the application of this rule.

GRUZ – R24	Support in part	I support this rule in principle. However, pre-existing non-compliance with Rule GRUZ – R1 should be recognised as being acceptable for the application of the rule.	Amend so that existing non-compliance with points 1, 2, 3 and 4 of Rule GRUZ – R1 does not preclude the application of this rule.
GRUZ – R25-29	Support	I support these rules.	Retain as notified.
GRUZ – R31	Oppose in part	I believe this rule is too restrictive.	Delete point 1. Amend “Non-complying” to “N/A” under “Activity status where compliance not achieved”.

RLZ - Rural Lifestyle Zone

Plan Provision	Support/Oppose	Reasons	Decision Sought
Rural Lifestyle Zone	Oppose in part	I oppose my properties, Lot 1 DP 450105 and Lot 2 DP 450105 (i.e. 115 Okari Road, Cape Foulwind), being excluded from the Rural Lifestyle Zone. It is an appropriate zone given the surrounding proposed zoning.	Amend so that my property is zoned Rural Lifestyle Zone.
RLZ – R1	Support	I support this rule.	Retain as notified.
RLZ – R3 and R5	Support in part	I support this rule in principle. However, pre-existing non-compliance with Rule RLZ – R1 should be recognised as being acceptable for the application of the rule.	Amend so that pre-existing non-compliance with Rule RLZ – R1 does not preclude the application of this rule.
RLZ – R6	Support in part	I support this rule.	Retain as notified.

RLZ – R7-R9	Support in part	I support this rule in principle. However, pre-existing non-compliance with Rule RLZ – R1 should be recognised as being acceptable for the application of the rule.	Amend so that pre-existing non-compliance with Rule RLZ – R1 does not preclude the application of this rule.
RLZ – R12-R14	Support in part	I support this rule in principle. However, pre-existing non-compliance with Rule RLZ – R1 should be recognised as being acceptable for the application of the rule.	Amend so that pre-existing non-compliance with Rule RLZ – R1 does not preclude the application of this rule.
RLZ – R16	Support in part	I support this rule but it is restrictive and non-compliance should not mean the activity is Non-complying.	Delete point 1. Amend “Non-complying” to “N/A” under “Activity status where compliance not achieved”.
RLZ – R17	Oppose in part	This rule is too restrictive, and non-compliance should not mean the activity is Non-complying.	Amend to be more enabling of development.
RLZ – R19-R22	Support	I support these rules.	Retain as notified.
RLZ – R23-R25	Oppose	These rules are too restrictive.	Delete.

PART 4 – APPENDICES

SCHEDULES

Schedule Four: Significant Natural Areas

Plan Provision	Support/Oppose	Reasons	Decision Sought
Schedule Four: Significant Natural Areas	Support in part	I support that areas of significant indigenous vegetation and fauna habitat will be identified through the resource consent process until such time as district wide identification and mapping	Retain Schedule as notified

		<p>of significant natural areas is undertaken in an appropriate and consultative way and that a formal Plan Change occurs after that time.</p> <p>I support this policy in principle. I believe that a June 2027 deadline is too ambitious to undertake the work in a way that sufficiently involves landowners.</p>	
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Schedule Five: Outstanding Natural Landscapes

Plan Provision	Support/Oppose	Reasons	Decision Sought
Schedule Five: Outstanding Natural Landscapes	Support in part	I support that Lot 1 DP 450105 and Lot 2 DP 450105 (i.e. 115 Okari Road, Cape Foulwind) are not included in the schedule.	Listed parcels to remain excluded.

Schedule Six: Outstanding Natural Features

Plan Provision	Support/Oppose	Reasons	Decision Sought
Schedule Six: Outstanding Natural Features	Support in part	I support that Lot 1 DP 450105 and Lot 2 DP 450105 (i.e. 115 Okari Road, Cape Foulwind) are not included in the schedule.	Listed parcels to remain excluded.

Schedule Seven: High Coastal Natural Character

Plan Provision	Support/Oppose	Reasons	Decision Sought
Schedule Seven: High Coastal Natural Character	Support in part	I support that Lot 1 DP 450105 and Lot 2 DP 450105 (i.e. 115 Okari Road, Cape Foulwind) are not included in the schedule.	Listed parcels to remain excluded.

Schedule Eight: Outstanding Coastal Natural Character

Plan Provision	Support/Oppose	Reasons	Decision Sought
Schedule Eight: Outstanding Coastal Natural Character	Support in part	I support that Lot 1 DP 450105 and Lot 2 DP 450105 (i.e. 115 Okari Road, Cape Foulwind) are not included in the schedule.	Listed parcels to remain excluded.

APPENDICES

Appendix One: Transport Performance Standards

Plan Provision	Support/Oppose	Reasons for the Submission	Decision Sought
Transport Performance Standards	Oppose in part	These unnecessarily restrictive and complex. There also appear to be potential errors in the table. The qualifiers are not consistent, and this makes the table difficult to use.	Amend to be less onerous, more consistent and correct errors.