

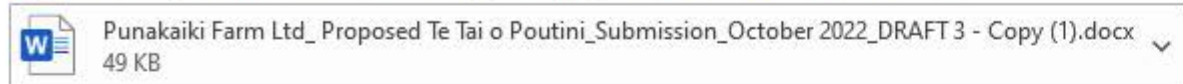
Submission



Lee Orton (NZ) <lee.orton@travel-associates.co.nz>

To ○ TTPP Info

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Please find attached my submission to the proposed TTPP.

<u>SUBMITTER DETAILS</u>	
First name	Neil
Last name	Mouat
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
Postal address	CMB 47 Punakaiki RD1 Runanga
Email	neil@pancake-rock.co.nz
Phone	0212731183
<u>OUR SUBMISSION</u>	
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

Punakaiki Farm Limited Submission on Proposed Te Tai o Poutini Plan

Our submission explicitly extends to include any other related provisions in the plan touched on in our submission and/or concerning our submission or relevant to the matters raised in our submission. I wish to speak to our 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 2 – DISTRICT-WIDE MATTERS

Natural Hazards

Plan Provision	Support/Oppose	Reasons for the Submission	Decision Sought
New Objective	-	Similarly to NH – O4, the role that protective structures play in natural hazard mitigation needs to be recognised in the Natural Hazards Objectives.	Add a new objective: <i>To ensure the role of hazard mitigation played by protective structures and works that minimise impacts of hazards including rockwalls and stopbanks is recognised and protected.</i>
NH – P3	Oppose in part	Inclusion of the word “existing” in this policy unduly limits future development, even where risk from natural hazard is low or could be substantially mitigated using technical solutions is obstructed.	Amend to: <i>When managing natural hazards: a. Promote the use of natural features and appropriate risk management approaches in preference to hard engineering solutions in mitigating natural hazard risks; and</i>

Commented [LCM1]: Does this capture your comments about rockwalls etc? Or have I misunderstood?

			<p><i>b. Avoid increasing risk to people, property and the environment; while</i></p> <p><i>c. Recognising that in some circumstances hard engineering solutions may be the only practical means of protecting existing communities and critical infrastructure.</i></p>
NH – P4			
NH – P10	Oppose in part	The wording of this policy is too restrictive and precludes a landowner seeking other expert input or utilising solutions there hazard could be substantially mitigated using technical solutions.	Include wording that allows technical solutions or differing expert opinion to support resource consent applications for development. The wording of NH – P11 is more appropriate for severe overlays than the current wording.
NH – R1	Oppose in part	Two and five years is an insufficient length of time for reconstruction/replacement.	Amend rule so that there is ten year period within which lawfully established buildings can be reconstructed/replaced in all overlays.
NH – R38	Oppose in part	Two and five years is an insufficient length of time for reconstruction/replacement and there is no activity status where compliance is not achieved.	Amend rule so that there is ten year period within which lawfully established buildings can be reconstructed/replaced in all overlays and if compliance is not achieved, this should be a Discretionary Activity.

Commented [LCM2]: You had some strong feelings about the way this is handled so I think you should respond in the way that best matches your thoughts.

Commented [LCM3]: Is this what you meant?

NH – R41	Oppose in part	The activity status when compliance is not achieved is too restrictive.	Amend status when compliance is not achieved to Discretionary.
NH – R42	Oppose in part	The activity status when compliance is not achieved is too restrictive.	Amend status when compliance is not achieved to Discretionary.
NH – R44	Oppose	Activity status is too restrictive.	Amend status to Discretionary.

Sites and Area of Significance to Māori

Plan Provision	Support/Oppose	Reasons for the Submission	Decision Sought
SASM – R9	Support	We support that maintenance, repair and Upgrading of Network Utility Structures on or within SASM 31 is a permitted activity.	Retain as notified.

Ecosystems and Indigenous Biodiversity

Plan Provision	Support/Oppose	Reasons for the Submission	Decision Sought
ECO – P1	Support	We 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.	Retain as notified.
ECO – P3	Support	We support this policy.	Retain as notified.
ECO – P4	Support	We support this policy.	Retain as notified.
ECO – P7	Support in part.	We support that this policy provides for consideration of “the appropriateness of any biodiversity offsetting or	Retain as notified.

		compensation in accordance with Policy 9 to offset any residual adverse effects that remain after avoiding, remedying and mitigating measures have been applied.”	
ECO – P9	Support	We support this policy.	Retain as notified.
ECO – R1 ECO – R2	Oppose in part	We request that provision is made for low-level clearance for building sites within SNAs (including for future/not yet approved subdivisions). Providing for these types of living options can actually facilitate predator and pest management and control and is an important lifestyle option for the region.	Amend wording to provide for building sites.
ECO – R4/ SUB – R7	Refer to SUB – R7 below.		
ECO - R6/ SUB - R9	Refer to SUB – R9 below.		
ECO - R8/SUB - R15	Refer to SUB – R15 below.		
ECO - R9/SUB - R27	Refer to SUB – R27 below.		

Natural Features and Landscapes

Plan Provision	Support/Oppose	Reasons for the Submission	Decision Sought
NFL – P1	Oppose in part	Residential activities must be provided for.	Amend to include residential activities.
Other provisions			

Commented [LCM4]: Do you want tourism or commercial added as well?

Commented [LCM5]: The other provisions have been drafted to be enabling. You need to decide how you feel about them.

Subdivision

Plan Provision	Support/Oppose	Reasons for the Submission	Decision Sought
SUB – P9	Oppose in part	Esplanade reserves and strips should not be required to be wider than 20m	Delete references to widths greater than 20m.
SUB – R5	Support	The activity status when compliance with point 6 (i.e. Coastal Severe Overlays etc) is appropriate. Where compliance is not achieved, status should be Discretionary.	Retain status when compliance with point 6 is not achieved to Discretionary.
SUB – R7/ ECO – R4	Oppose name and, therefore, extent of rule	The provision heading is unclear given SNAs are yet to be mapped.	Amend heading to read: <i>Subdivision to create allotment(s) of Land Containing a Scheduled Area of Significant Indigenous Biodiversity.</i>
	Oppose point 2	This is not necessary and a SNA does not need to be within a single allotment.	Delete.
	Oppose point 3 in part	Biodiversity offsetting or compensation etc. should be able to be considered within this point.	Amend to: <i>The subdivision will not result in buildings or access ways being located within the identified area of significant indigenous biodiversity or the need for clearance of significant indigenous vegetation to provide for future access to any site <u>unless adverse effects can be addressed by alternative mitigation measures such as biodiversity offsetting and environmental compensation; and...</u></i>

SUB - R9/ECO - R6	Oppose in part	The provision is unclear given SNAs are yet to be mapped.	Amend heading to read: <i>Subdivision of Land to create allotment(s) Containing an Scheduled Area of Significant Indigenous Biodiversity not meeting Rule SUB – R7.</i>
	Oppose point 2	This is not necessary and a SNA does not need to be within a single allotment.	Delete.
	Oppose point 3 in part	Biodiversity offsetting or compensation etc. should be able to be considered within this point.	Amend to: <i>The subdivision will not result in buildings or access ways being located within any Significant Natural Area identified in Schedule Four unless adverse effects can be addressed by alternative mitigation measures such as biodiversity offsetting and environmental compensation; and...</i>
SUB – R10			
SUB – R11			
SUB R15/ECO – R8	Oppose in part	Points 1 and 2 should be deleted from this rule as the escalation to Non-Complying is inappropriate and too restrictive.	Delete points 1 and 2. Activity status where there is non-compliance should be deleted as there should be no escalation to Non-Complying status.
SUB – R16	Oppose in part	Point 1 should be deleted from this rule as the escalation to Non-Complying is inappropriate and too restrictive.	Delete point 1.

Commented [LCM6]: Note, because you are a SASM, for this kind of activity, you would need "written confirmation is provided by the relevant Poutini Ngāi Tahu rūnanga" for subdivision to be a Restricted Discretionary Activity.

You should populate this with your thoughts here.

Commented [LCM7]: The "where" points 1-3 here will mean this rule doesn't apply to you so you will get o Discretionary.

			Activity status where there is non-compliance should be deleted as there should be no escalation to Non-Complying status.
SUB – R17			
SUB – R18	Support	We support this rule.	Retain
SUB – R21	Oppose in part.	We support this rule but note the error that where activity status where compliance is not achieved status becomes Non-complying	Amend to: <i>Activity status where compliance not achieved:</i> Non-complying N/A.
SUB – R24	Oppose.	The rule is too restrictive.	Delete
SUB – R25	Oppose.	The rule is too restrictive.	Delete
SUB - R27/ ECO - R9	Oppose	The rule is too restrictive.	

Commented [LCM8]: Note, because you are a SASM, for this kind of activity, you would need "written confirmation is provided by the relevant Poutini Ngāi Tahu rūnanga" for subdivision to be a Restricted Discretionary Activity.

You should populate this with your thoughts here.

General District-Wide Matters

Coastal Environment

Coastal Environment

Plan Provision	Support/Oppose	Reasons	Decision Sought
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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	We 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 impacts on natural character, landscape, natural features, access and biodiversity values are minimised.</i>
CE – P1	Support	We support this provision.	Retain as notified.
CE – P4	Support in part.	We 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.	We 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	We support this provision.	Retain as notified.
CE – R1	Support	We 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	Oppose in part	We believe this is too restrictive.	Amend to be more enabling of development.
CE – R6	Oppose in part	We believe this is too restrictive.	Amend to be more enabling of development.

CE – R7	Oppose in part	We believe this is too restrictive.	Amend to be more enabling of development.
CE – R8	Oppose in part	We believe this is too restrictive.	Amend to be more enabling of development.
CE – R9	Oppose in part	We believe this is too restrictive.	Amend to be more enabling of development.
CE – R10	Oppose in part	We believe this is too restrictive.	Amend to be more enabling of development.
CE – R11	Oppose in part	We believe this is too restrictive.	Amend to be more enabling of development.
CE – R12	Oppose in part	We believe this is too restrictive.	Amend to be more enabling of development.
CE – R14	Oppose in part	We believe this is too restrictive.	Amend to be more enabling of development.
CE – R15	Oppose in part	We believe this is too restrictive.	Amend to be more enabling of development.
CE – R16	Oppose in part	We believe this is too restrictive.	Amend to be more enabling of development.
CE – R17	Oppose in part	We believe this is too restrictive.	Amend to be more enabling of development.
CE – R18	Oppose in part	We believe this is too restrictive.	Amend to be more enabling of development.
CE – R19	Oppose in part	We believe this is too restrictive.	Amend to be more enabling of development.
CE – R21	Oppose in part	We believe this is too restrictive.	Amend to be more enabling of development.

Scenic Visitor Zone

Plan Provision	Support/Oppose	Reasons	Decision Sought
SVZ – R1-R9	Oppose in part	We believe these rules are too restrictive.	Amend to be more enabling of development.

Outstanding Natural Landscapes and Outstanding Coastal Natural Character and High Coastal Natural Character and Associated Provisions

Plan Provision	Support/Oppose	Reasons	Decision Sought
SVZ – R1-R9	Oppose in part	We believe these rules are too restrictive.	Amend to be more enabling of development.

Ecosystems and Indigenous Biodiversity

Plan Provision	Support/Oppose	Reasons for the Submission	Decision Sought
ECO – R5	Oppose in part	We believe this is too restrictive.	Amend to be more enabling of development.
ECO – R7	Oppose in part	We believe this is too restrictive.	Amend to be more enabling of development.

Plan Provision	Support/Oppose	Reasons for the Submission	Decision Sought
CE – P6	Support	We support this policy.	Retain as notified.
Other provisions			

Commented [LCM9]: I understand that these have been drafted to be as enabling as possible. It may be that they are legally challenged so supporting them may be a good idea. Or at least "supporting in part". If there are any you don't like, they should be added in.

PART 3 – AREA SPECIFIC MATTERS

Zones

Special Purpose Zone - Scenic Visitor Zone

Plan Provision	Support/Oppose	Reasons for the Submission	Decision Sought
SVZ – O1	Support	We support this objective.	Retain as notified.
SVZ – O2	Support	We support this objective.	Retain as notified.
SVZ – P1	Support in part Oppose in part	Provide for growth and change to the Fox Glacier, Franz Josef/Waiau and Punakaiki townships that: <ul style="list-style-type: none"> a. Supports the long-term viability of the commercial areas and the communities that support them; b. Recognises the unique scenic qualities of the environments and does not compromise the dominance of the natural landscape setting in which the townships are located; and 	

Commented [LCM10]: Review all aquamarine/teal highlighting provisions to determine if you have any thoughts you want to submit.

		c. Avoids locating further development in areas at greatest risk from significant natural hazards.	
SVZ – P2	Oppose in part	Provide for new commercial development areas beyond the current Fox Glacier and Franz Josef/Waiau centres where these are at lower risk from natural hazards and avoid areas of high hazard risk.	
SVZ – P3	Support	We support this objective.	Retain as notified.
SVZ – P4	Support in part	Staff/worker accommodation needs to be better recognised in the policy.	Amend to: <i>Support the development of appropriate tourism and visitor businesses such as <u>visitor accommodation</u>, <u>visitor attractions</u>, <u>worker accommodation</u> and <u>tourism support facilities</u> that relate to the scenic environment in which they are located.</i>
SVZ – P5	Support	We support this objective.	Retain as notified.
SVZ – P6			
SVZ – P7			
SVZ – R1***	Oppose in part	Aspects of this rule are far too onerous particularly those relating to external storage and waste management space and colour specifications.	Delete SVZ – R1 2. or, if compliance not achieved, this should default to a RDA not a DA. Delete SVZ – R1 4.
SVZ – R2			
SVZ – R3			
SVZ – R4			

Commented [LCM11]: Do you want to include comments about staff accommodation?
Do you want to amend this to include some more "moderate" or "pragmatic" comment around natural hazards as per our discussion?

Commented [LCM12]: Do you want Punakaiki included here?

Commented [LCM13]: How do you feel about this? Is it too onerous?

Commented [LCM14]: How do you feel about the Punakaiki Masterplan? Strong feelings either way or not worried?

SVZ – R5			
SVZ – R6			
SVZ – R7			
SVZ – R8			
SVZ – R9			

SCHEDULES

Schedule Three: Sites and Areas of Significance to Māori

Plan Provision	Support/Oppose	Reasons for the Submission	Decision Sought
SASM 31	Support	We support that there are no relevant permitted activity rules relating to SASM 31.	Retain as notified.

Schedule Five: Outstanding Natural Landscapes

Plan Provision	Support/Oppose	Reasons for the Submission	Decision Sought
	Oppose in part	We do not agree that the extent of Outstanding Natural Landscape has been correctly mapped in relation to our property (4224 State Highway 6, Punakaiki).	Amend overlay extent.

Schedule Eight: Outstanding Coastal Natural Character

Plan Provision	Support/Oppose	Reasons for the Submission	Decision Sought
	Oppose in part	We do not agree that the extent of Outstanding Coastal Natural Character has been correctly mapped in relation to our property (4224 State Highway 6, Punakaiki). We have an existing consented	Amend overlay extent.

		use within the outstanding coastal natural character mapping on our property.	
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PLANNING MAPS AND OVERLAYS

Coastal Severe Overlay

Plan Provision	Support/Oppose	Reasons for the Submission	Decision Sought
Coastal Severe Overlay	Oppose in part	We do not agree that the hazard has been correctly mapped in the vicinity of our property (4217 State Highway 6, Punakaiki).	Amend overlay extent.

Outstanding Natural Landscape Overlay

Plan Provision	Support/Oppose	Reasons for the Submission	Decision Sought
Outstanding Natural Landscape	Oppose in part	We do not agree that the extent of Outstanding Natural Landscape has been correctly mapped in relation to our property (4224 State Highway 6, Punakaiki).	Amend overlay extent.

Outstanding Coastal Natural Character Overlay

Plan Provision	Support/Oppose	Reasons for the Submission	Decision Sought
Outstanding Coastal Natural	Oppose in part	We do not agree that the extent of Outstanding Coastal Natural Character has been correctly mapped in relation to our property (4224 State Highway 6, Punakaiki).	Amend overlay extent.

Character Overlay			
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DRAFT