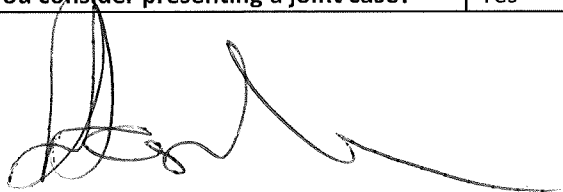


Please find attached our submission to the proposed TTPP.

<b>SUBMITTER DETAILS</b>	
First name	Kevin
Last name	Scanlon
Are you submitting as an individual, or on behalf of an organisation?	Organisation
Organisation (if applicable)	Martin & Co Westport Ltd and Lumberland Building Market Westport
Would you gain an advantage in trade competition through this submission?	No
Postal address	PO Box 23 Westport
Email	kevin.scanlon@mitre10.co.nz
Phone	03 7897879
<b>OUR SUBMISSION</b>	
The specific provisions of the proposal that my submission relates to are	<ul style="list-style-type: none"><li>• Strategic Direction</li><li>• Energy Infrastructure and Transport</li><li>• Hazards and Risks</li><li>• Historical and Cultural Values</li><li>• Natural Environment Values</li><li>• Subdivision</li><li>• General District Wide Matters</li><li>• Zones</li><li>• Schedules</li><li>• Appendices</li><li>• General feedback</li></ul>
Do you wish to speak your submission?	Yes
Would you consider presenting a joint case?	Yes

Signed



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We are really concerned about the quality of this plan. It appears to have been written with a shotgun. There are so many simple errors in the basic information that you must consider that the more detailed rules are also error ridden. A few examples of basic information errors are in the designation section under Westport pages 574&575. Where is the Westport Community Hall, Memorial Hall, or the PYC Hall?? Where is Victoria Park in Westport?? We know of a Victoria Square which is also mentioned in parts of the plan. These mistakes are not major in the scheme of the plan but indicate a poorly executed document. We are very concerned that this will be adopted in its current format.

We raise the following concerns.

Firstly, the proposed conditions for commercial zones seem very restrictive and are reinforced by the following statement about our current building page pages 776/777, BF1:

*"This long low building shape should be avoided. This building also lacks windows and has limited design features and detail to add interest to the building. The buildings colours are also very out of character with other buildings in the vicinity and are part of a sign to brand the building."*

We are not sure of the relevance of this statement. The Town Centre Zone for Westport TZC is stated in several parts of the plan as between Henley St and Rintoul St. We fall out of that zone and into the Commercial area. That is one of the reasons we built where we are. We have worked through the CMUZ and COMZ rules. We appear to meet most of them yet again questioning the relevance of the above statement.

We are a responsible community company. If you look at the building currently occupied by Toy World and the Westport Pharmacy, it meets all the requirements for the TCZ. We demolished and rebuilt that in 1988 and retained all the verandah posts and fret work and installed a full glass frontage. It served us well for around 15 years but gradually the realization occurred that we could not stay there and that we needed a bigger more

practical building to service the Buller Community. For the town to prosper and development to occur there needs to be an acknowledgement that buildings like our current type need to be built. If it is not to happen in the area, where we have built where is it to happen? Is the idea of the plan to restrict development?

The building we replaced when we built meet none of the historical elements as described in the plan. We think what we have built substantially improved the area and helped an area of Palmerston St recover some of its life. It also added some confidence to the future of the Buller. We acknowledge that we do not meet the requirements for verandahs and windows but there isn't a building in our block either side of that has a verandah. In fact, between Pakington St (our corner) and the lagoon there is only one place which has a maybe verandah (this is a generous description). That is several blocks of Palmerston St without verandahs.

We feel our sort of development should be allowed in these areas. We are not confident that this plan in its current format allows this.

Our second concern is around the hazard maps and flood wall work. If this plan is to be proactive it needs to consider the social and financial impact the maps shown in the plan would have on Westport and its surrounds. In its current format the financial and social impact would cause a lot of pain for anyone who owns a property. The plan should include the maps with the flood walls/stop banks included. It should cover off rules for floor heights required with the flood protection in place. If this is not possible, the plan should include rules that allow them to be considered in the future. On the modelling to date using 50-year flood heights would be more than adequate as there should be no flooding. It is our understanding that if houses were built above the currently modelled 2% AEP level with an additional 0.5m freeboard, there would not have been widespread inundation and, potentially, there may have been no inundation at all in July 2021. There should be a provision to allow for these heights to come into effect for the various areas in town as the works are completed to protect that area.

The stormwater problems need to be addressed. If the stormwater is repaired and upgraded and four high-capacity pumps placed in the low points of town when coupled with the walls it will provide an enduring and effective protection from multiple hazards from high rainfall events.

This then leads us to concerns over apparent lack of urgency around developing the plans for the flood walls. The council has approved spending of 10.2 million. Why isn't this being used to do some of the initial stages of the proposed works while we wait for the government decision on funding?

We are told by government that we need a package with various solutions. Flexibility around floor heights in the interim should be part of that package. For all the other parts of this plan to work Westport needs to be a healthy centre of Buller.

## **Martin & Co Westport Ltd Submission on Proposed Te Tai o Poutini Plan**

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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. We wish to speak to our submission. We will consider presenting a joint case if others make a similar submission. We would not gain an advantage in trade competition through this submission

### **PART 2 – DISTRICT-WIDE MATTERS**

#### **Natural Hazards**

<b>Provision</b>	<b>Support/Oppose</b>	<b>Reasons</b>	<b>Decision Sought</b>
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 rock walls and stop banks is recognised and protected.</i>
NH – P3	Oppose in part	Inclusion of the word “existing” in this policy unduly limits future development,	Amend as follows: <i>When managing natural hazards:</i>

		<p>even where risk from natural hazard is low or could be substantially mitigated using technical solutions is obstructed.</p>	<p><i>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></p> <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 <del>existing</del> communities and critical infrastructure.</i></p>
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**PART 3 – AREA-SPECIFIC MATTERS**

**COMMERCIAL AND MIXED USE ZONES**

**CMUZ – Commercial and Mixed Use Zones – Objectives and Policies**

<b>Plan Provision</b>	<b>Support/Oppose</b>	<b>Reasons</b>	<b>Decision Sought</b>
CMUZ – O1-O3	Support	We support the objectives.	Retain as notified.
CMUZ – P2-P3	Support	We support the policy.	Retain as notified.
CMUZ – P4	Oppose	These provisions are too restrictive in their scope. They do not	Deleted points a. – d.

		scope. They do not adequately recognize that to be functional and provide services the community wants and needs.	
CMUZ – P13	Oppose in part	<p>These provisions are too restrictive in their scope. They do not adequately recognize that to be functional and provide services the community wants and needs.</p> <p>The commercial zone should not be constrained by such an emphasis on traditional “amenity values”.</p>	<p>Amend as follows:</p> <p><i>Activities in the COMZ - Commercial, MUZ - Mixed-Use and NCZ - Neighbourhood Centre Zones should:</i></p> <ul style="list-style-type: none"> <li>a. <i>Meet performance standards on development and land use that <del>maintain or</del> <u>enhance the amenity of the commercial areas</u> <del>and</del> do not create adverse effects beyond the boundaries of these areas, particularly in respect of residential areas;</i></li> <li>b. <i>Provide safe urban design (including pedestrian and vehicle safety); and</i></li> <li>c. <i>Avoid the fragmentation of town centres.</i></li> </ul>

**COMZ – Commercial Zone**

Plan Provision	Support/Oppose	Reasons for the Submission	Decision Sought
Commercial Zone	Oppose in part	We do not agree with the extent of the commercial zone.	Amend zoning to include 34 Russell Street (Lot 1 DP

			16517), 7 Pakington Street (Part Section 104 Town of Westport/Lot 2 A 444), 8 Pakington Street and 34 Russell Street (Lot 1 DP 475753).
COMZ – R1	Support in part	We support the rule in principle but believe that it is too onerous especially with regards to landscaping and building height.	Amend to landscaping provisions to be less onerous.  Amend points 1 as follows:  <i>The maximum height above ground level is <del>12</del> 15 metres except that this standard does not apply to hose drying towers at Emergency Service Facilities;</i>
COMZ – R2	Oppose in part	We do not support point 1. It is unnecessary and onerous.	Delete point 1.
COMZ – R3	Support	We support the rule.	Retain as notified.
COMZ – R4	Oppose	This rule is unnecessary.	Delete.
COMZ – R5	Oppose	The rule is too complex and onerous.	Amend to be less complex and less onerous.
COMZ – R6	Support in part	Point 1 for these rules should allow for existing, legal non-compliance with COMZ – R1.	Amend as follows:  <i>1. All performance standards for Rule COMZ - R1 other</i>

			<i>than those that relate to External Storage and Recession Planes are complied with <u>or the activity does not increase extent of existing non-compliance with performance standards for Rule COMZ – R1</u>;</i>
COMZ – R7	Oppose	This rule is unnecessary.	Delete.
COMZ – R8	Support in part	There should be no conditions included as part of this rule. It is appropriate that all activities listed in the rule be considered as part of a Discretionary Activity application.	Delete condition 1 – 3. Amend as follows: <i>Activity status where compliance not achieved:</i> <del>Non-complying N/A.</del>
COMZ – R9	Support	We support this rule.	Retain as notified.
COMZ – R10	Oppose	This is too onerous and should be a Discretionary Activity.	Amend status to Discretionary.
COMZ – R11	Oppose	We do not support this rule.	Delete.

## **SCHEDULES**

### **Schedule Three: Sites and Areas of Significance to Māori**

<b>Plan Provision</b>	<b>Support/Oppose</b>	<b>Reasons</b>	<b>Decision Sought</b>
SASM 12	Support	We support that there are no relevant permitted activity rules relating to SASM 12.	Retain as notified.

## **PLANNING MAPS AND OVERLAYS**



## Commercial Zone

<b>Plan Provision</b>	<b>Support/Oppose</b>	<b>Reasons</b>	<b>Decision Sought</b>
Commercial Zone	Oppose in part	We do not agree with the extent of the commercial zone.	Amend zoning to include 34 Russell Street (Lot 1 DP 16517), 7 Pakington Street (Part Section 104 Town of Westport/Lot 2 A 444), 8 Pakington Street and 34 Russell Street (Lot 1 DP 475753).

## **NATURAL HAZARD OVERLAYS AND ASSOCIATED OBJECTIVES, POLICIES AND RULES**

### **Westport Hazard Overlay and Associated Natural Hazard and Subdivision Objectives, Policies and Rules**

<b>Plan Provision</b>	<b>Support/Oppose</b>	<b>Reasons</b>	<b>Decision Sought</b>
Westport Hazard Overlay and associated Natural Hazard and Subdivision objectives, policies and rules.	Oppose	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.

### **Flood Hazard Severe and Associated Natural Hazard and Subdivision Objectives, Policies and Rules**

<b>Plan Provision</b>	<b>Support/Oppose</b>	<b>Reasons</b>	<b>Decision Sought</b>
Flood Hazard Severe Overlay and associated Natural Hazard and Subdivision objectives, policies and rules.	Oppose	We understand that there is a possibility that this overlay will be extended from what is notified in the proposed plan. We do not support our properties being included in any extension.	Oppose any extension from what has been notified that would include our properties.  Amend associated objectives, policies and rules to be more enabling.

**Flood Hazard Susceptibility and Associated Natural Hazard and Subdivision Objectives, Policies and Rules**

<b>Plan Provision</b>	<b>Support/Oppose</b>	<b>Reasons</b>	<b>Decision Sought</b>
Flood Hazard Susceptibility Overlay and associated Natural Hazard and Subdivision objectives, policies and rules.	Oppose	We understand that there is a possibility that this overlay will be extended from what is notified in the proposed plan. We do not support our properties being included in any extension.	Oppose any extension from what has been notified that would include our properties.  Amend associated objectives, policies and rules to be more enabling.

**Coastal Hazard Susceptibility and Associated Natural Hazard and Subdivision Objectives, Policies and Rules**

<b>Plan Provision</b>	<b>Support/Oppose</b>	<b>Reasons</b>	<b>Decision Sought</b>
Coastal Hazard	Oppose	We understand that there is a possibility that this overlay will	Oppose any extension from

Susceptibility Overlay and associated Natural Hazard and Subdivision objectives, policies and rules.		be extended from what is notified in the proposed plan. We do not support our properties being included in any extension.	what has been notified that would include our properties.  Amend associated objectives, policies and rules to be more enabling.
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**Coastal Hazard Severe and Associated Natural Hazard and Subdivision Objectives, Policies and Rules**

<b>Plan Provision</b>	<b>Support/Oppose</b>	<b>Reasons</b>	<b>Decision Sought</b>
Coastal Hazard Severe Overlay and associated Natural Hazard and Subdivision objectives, policies and rules.	Oppose	We understand that there is a possibility that this overlay will be extended from what is notified in the proposed plan. We do not support our properties being included in any extension.	Oppose any extension from what has been notified that would include our properties.  Amend associated objectives, policies and rules to be more enabling.