Te Tai o Poutini Plan Proposed Plan

Submission form

Have your say! Te Tai o Poutini Plan Proposed Plan

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: Peter Surname: Jefferies

Are you submitting as an individual, or on behalf of an organisation? ☑ Individual ☐ Organisation

Organisation (if applicable):

Would you gain an advantage in trade competition through this submission? ☐ Yes ☑ No

If you **could** gain an advantage in trade competition through this submission please complete the following:

I am ☐ /am not ☐ directly affected by an effect of the subject matter of the submission that (a) adversely affects the environment; and (b) does not relate to trade competition or the effects of trade competition.

Postal address: 843 Atarau Road

Email: paj1308@gmail.com Phone: 0275053399

Signature: Date: 10 November 2022

Your submission:

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

- ☐ Strategic Direction
- ☐ Historical and Cultural Values
- ☐ General District Wide Matters
- ☑ Appendices
- ☑ Energy Infrastructure and Transport
- ☐ Natural Environment Values
- ☑ Zones
- ☐ General feedback
- ☐ Hazards and Risks
- ☑ Subdivision
- ☐ Schedules

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

Te Tai o Poutini PLAN
A combined district plan for the West Coast

My submission:

(Include whether you support or oppose the specific provisions or wish to have them amended, reasons for your views and the decision you seek from us).

See attached. This submission relates to; highly productive land, flood plain.

Please attach more pages if required.

How to send in your submission form

- *Did you know you can complete this submission form online?*

Online submission form:
www.ttpp.nz

- *Or post this form back to us:*

TTPP Submissions, PO Box 66, Greymouth 7840

Submissions must be made by 5pm, Friday 11th November 2022

Want to know more?
www.ttpp.nz
0508 800 118

Te Tai o Poutini PLAN
A combined district plan for the West Coast

Submission to Proposed Te Tai o Poutini Plan

Submitter Name: Peter Jefferies

Contact Person: Peter Jefferies

Contact Email: paj1308@gmail.com

The Submitter

I am the owner of land (Lot 1 DP 3467, Section 2 BLK XV Waiwhero SD, Lot 1 DP 2743) in the Grey Valley, at 843 Atarau Road, and are directly affected by provisions of the proposed TTPP. I oppose certain elements of the proposed plan as set out below.

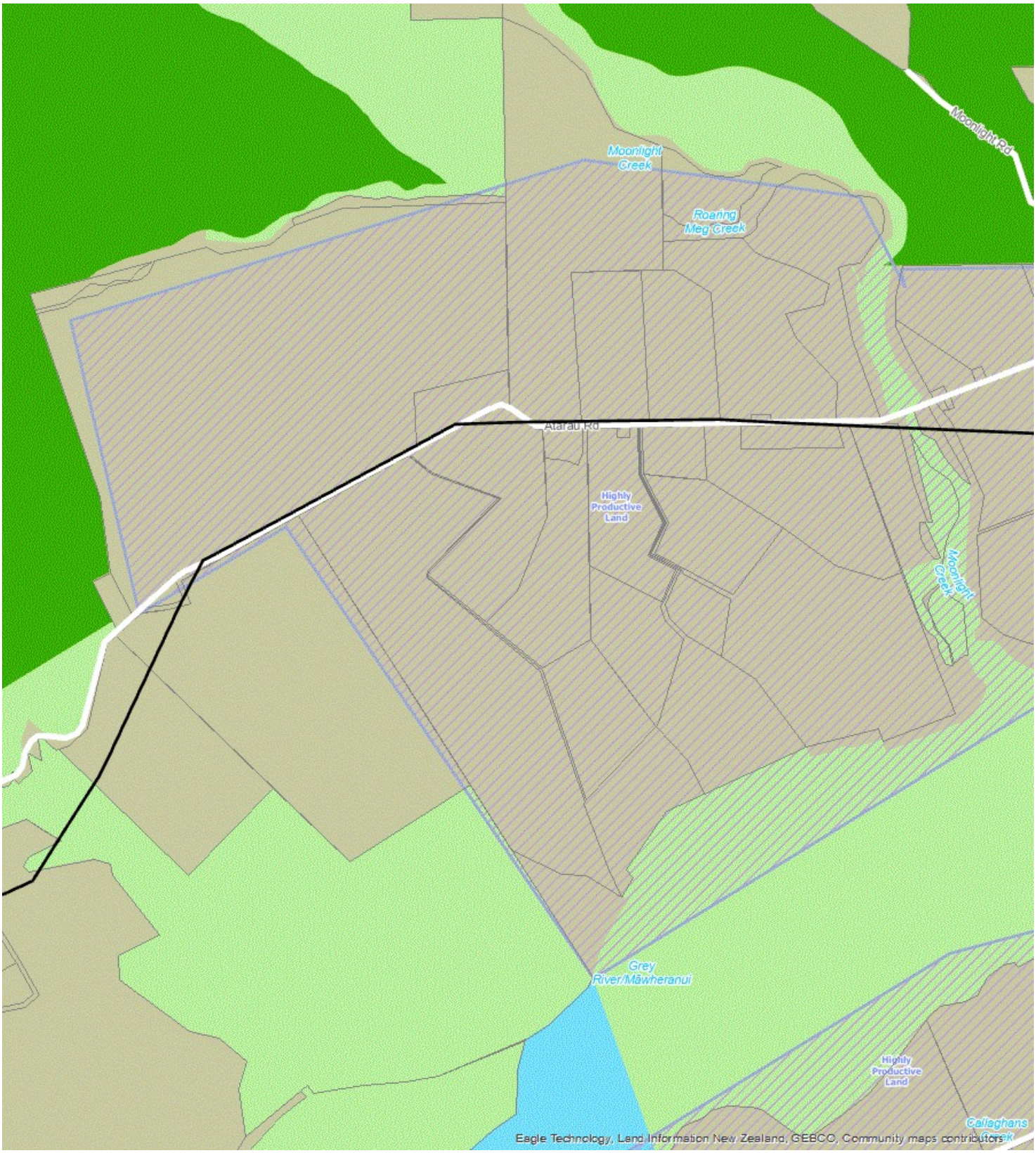
Highly Productive Land			
Provision	**Position**	**Reason**	**Requested Decision**
Planning Map **Rule Sub-R6** **Rule Sub-R8** **Subdivision Standard B-S1.h.** **RURZ-O1** **RURZ-P5** **GRUZ-PREC5-P5** **GRUZ-R3.3 – Residential Unit Density**	Oppose	I oppose the designation of highly productive land over my land as shown on the planning maps for a range of reasons; The "highly productive land" designation was not signalled in any of the documentation leading up to notification of the proposed plan. It was not included in the draft exposure plan which was notified for comment by interested parties. I did not make a comment to the draft as the issue was not signalled in the draft. Accordingly there was no consultation with directly affected parties in regard to this matter. I am not sure why that would be. I understand that there had been reference in the subdivision section regarding highly productive land and high value soils but neither of these terms was defined or mapped in regard to my land. I note that reference was, and still is, to land located at "Karamea and Totara Flat". I can confirm this land is in neither of those locations, and a considerable distance from Totara Flat and much further to Karamea. I understand there are no technical reports as to how the designation was	Remove the "highly productive land" designation from our property.

		arrived at. I oppose the fact that the designation is arbitrary and not as a result of a sound technical assessment of such matters throughout the region. Having nothing concrete to review and submit on I have reviewed the landuse capability map for the land and surrounding area. The maps show the land and surrounding area as a mix of Class 4 and Class 6 land. I understand that the Karamea land referred to in the plan appears to be Class 3 land only and excludes surrounding Class 4 land. I also understand that the land of similar class (and higher) in the Grey Valley adjoining the Grey District, i.e. in the Buller District, is not included and no land in the Westland District appears to be included. This leads to a conclusion that it is not an issue related to land "class". If the limit is Class 6 land and above then considerably more of the region than the current level of land would have been mapped. At the least land of a higher class would have been mapped. I have reviewed the provisions of the plan in order to make further submissions however there are; • no definitions relate to this matter; including highly productive land, versatile soils, economic farming unit. • no land use rules or enabling provisions are proposed to allow us to intensify rural land use above general rural provisions. • there is a reference to a "highly productive land precinct" however there is no definition of such a precinct in the plan and such is not referred to in the section titled "Precincts" in the "Relationships between spatial layers" section. My conclusion is that the designation is an arbitrary afterthought arising from the draft exposure plan process with little, if any, technical or practical consideration given to the outcome or implications of the proposal. I consider this does not meet the requirements of the planning process under the Act, including Section 32 of the Act. There are however, as a result of the designation, restrictions on	

		subdivision and residential unit density greater than for general rural land of a similar class throughout the region, and the Grey District. I object to the arbitrary imposition of these additional restrictions without consultation and a sound assessment. It is perhaps arguable that such provisions would not apply as subdivision assessment matters refer to "Totara Flat". The land is not at "Totara Flat" but it is shown on the maps and I object to the additional cost of having to deal with such issues given the lack of available foundation for such a designation. From a longer term perspective I understand that the National Policy Statement for Highly Productive Land came into force on 17 October 2022. That NPS contains provisions for identifying highly productive land both in the interim and eventually in the RPS. I note that my land is not highly productive land under the NPS, i.e. not identified in the RPS or in clause 3.5(7) of the NPS. A consequence of the TTPP process is likely to be that there is an assumption this matter is agreed, which is not the case. I consider my rights and involvement in the coming processes are prejudiced by this arbitrary approach as there has been no regional mapping or schedule 1 process undertaken. I object to a 10 hectare subdivision limit on my land given the conditions. I consider this is not consistent with the existing pattern of land use in the area. I oppose objectives, policies and rules seeking avoidance of fragmentation of our land based on the basis of an undefined designation of the land and lack of ability to have adequate input.	

Flood Plain			
Provision	**Position**	**Reason**	**Requested Decision**
Planning Map **SUB-R13**	Oppose	Planning Maps show my land as being within a "Flood Plain". The maps are clearly in error and I oppose that designation. I understand that there is no information as to how the mapping was	Remove the "Flood Plan" designation from our land.

Sub-R23		arrived so it is not possible to comment or submit further in that regard. No information has been provided as to return period modelling for the event covered by the flood plain. I object to having to face financial cost in the face of inaccurate information, when in fact no detailed technical information is available. My conclusion is that the mapping is arbitrary, and highly inaccurate with little, if any, technical or practical consideration given to the outcome or implications other than lines on a map. I consider this does not meet the requirements of the planning process under the Act, including Section 32 of the Act. Whilst this is not my issue I note the inaccuracy in other areas in the wider vicinity and have concerns for those landowners affected as to the implication of such designations. I am aware of problems arising from inaccurate hazard maps and do not want to see these issues becoming a problem for me. I am concerned regarding the potential insurance issues with inaccurate hazard mapping in the future, particularly for my house. When I built my house the site was assessed as not being subject to flooding yet my house is covered by the flood plain designation. I oppose that the incorrect notation can add additional cost to any subdivision proposals we may wish to undertake.	


Moonlight Rd
Moonlight Creek
Roaring Meg Creek
Atarau Rd
Highly Productive Land
Moonlight Creek
Grey River/Māwheranui
Highly Productive Land
Callaghans
Eagle Technology, Land Information New Zealand, GEBCO, Community maps contributors

TeTaiOPoutiniPlan Overlays

West Coast Boundary

National Grid

Significant Electricity Distribution Line

Airport Noise Contours

Airport Approach Paths

Notable Trees

Archeological Area

Heritage Areas

Designations

Property Boundaries

TeTaiOPoutiniPlan Zones

Precincts

Rifle Range Protection Area

Hokitika Visitor Accomodation Area

District Plan Zones

Neighbourhood Centre Zone

Commercial Zone

Town Centre Zone

Mixed Use Zone

Settlement Zone

General Residential Zone

Medium Density Residential Zone

Large Lot Residential Zone

Rural Lifestyle Zone

General Rural Zone

Light Industrial Zone

General Industrial Zone

Open Space Zone

Sport and Active Recreation Zone

Natural Open Space Zone

Special Purpose Zone - Airport Zone

Special Purpose Zone - Future Urban Zone

Special Purpose Zone - High Use Visitor Zone

Special Purpose Zone - Port Zone

Special Purpose Zone - Scenic Visitor Zone

Special Purpose Zone – Buller Coalfield Zone

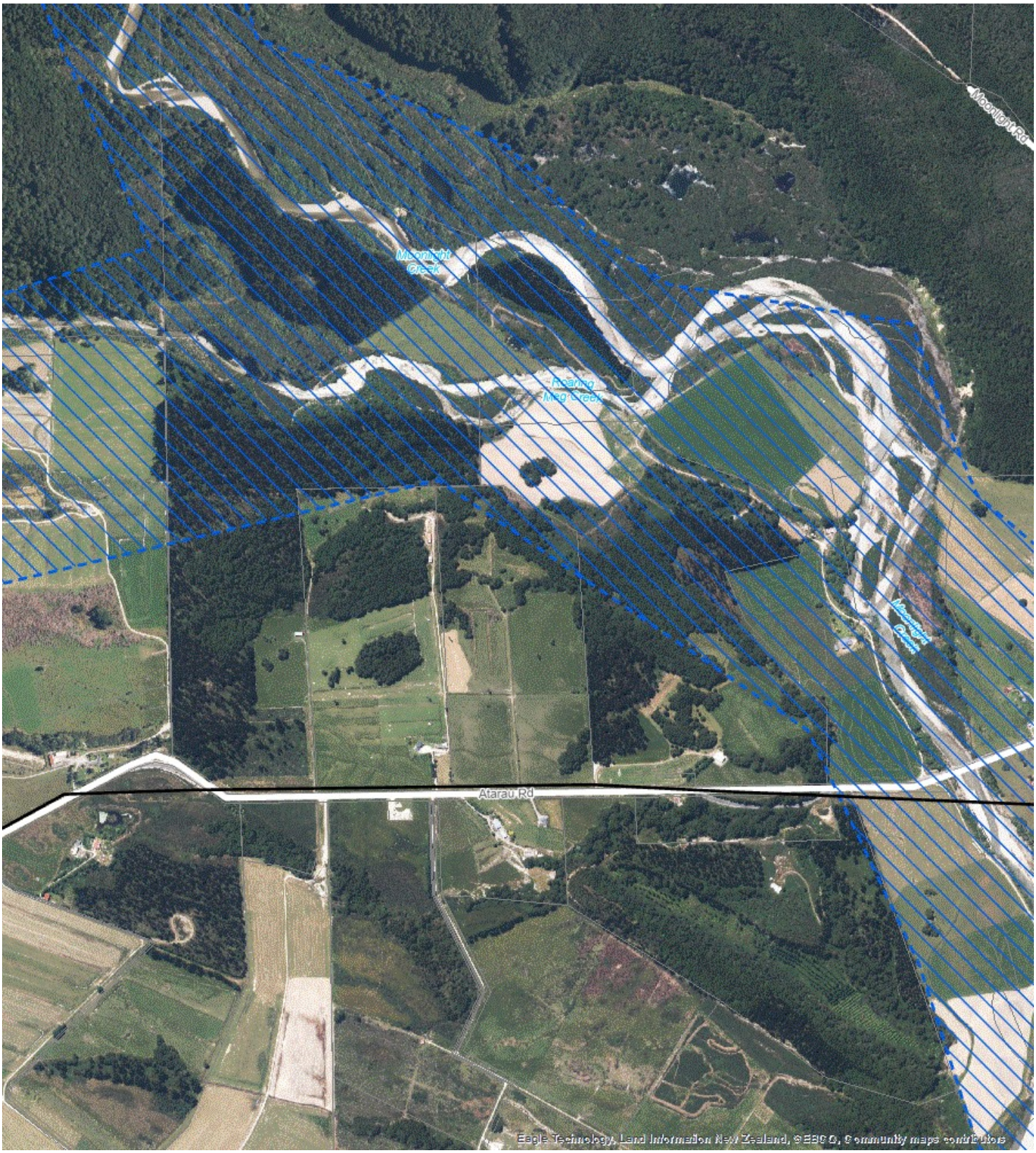
Special Purpose Zone – Hospital Zone

Special Purpose Zone – Mineral Extraction Zone

Special Purpose Zone – Māori Purpose Zone

Special Purpose Zone – Stadium Zone

Waterbody


Moonlight Rd
Moonlight Creek
Roaring Meg Creek
Atarau Rd
Eagle Technology, Land Information New Zealand, © ESRI, © Community maps contributors

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