

## 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: Martin & Lisa

Surname: Kennedy

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:

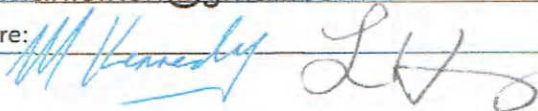
I am  /am not  directly affected by an effect of the subject matter of the submission that (a) adversely affects the environment; and (b) does not relate to trade competition or the effects of trade competition.

Postal address: 6 Dowling Road, Paroa, Greymouth 7805

Email: marlis.ken@gmail.com

Phone: (03) 7626554

Signature:



Date: 10 November 2022

## Your submission:

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

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

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.tppp.nz](http://www.tppp.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:** Martin & Lisa Kennedy

**Contact Person:** Martin Kennedy

**Contact Email:** [marlis.ken@gmail.com](mailto:marlis.ken@gmail.com)

### The Submitter

We are owners of land (Lot 3 DP 2743) in the Grey Valley, at Atarau, and are directly affected by provisions of the proposed TTPP. We oppose certain elements of the proposed plan as set out below.

Highly Productive Land			
Provision	Position	Reason	Requested Decision
<b>Planning Map</b> <b>Rule Sub-R6</b> <b>Rule Sub-R8</b> <b>Subdivision Standard B-S1.h.</b> <b>RURZ-O1</b> <b>RURZ-P5</b> <b>GRUZ-PREC5-P5</b> <b>GRUZ-R3.3 – Residential Unit Density</b>	Oppose	<p>We oppose the designation of highly productive land over our land as shown on the planning maps for a range of reasons;</p> <p>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. We made comment to that plan on a range of matters but had no knowledge that this designation was proposed. Accordingly there was no consultation with directly affected parties in regard to this matter. We are not sure why that would be.</p> <p>We note 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 our land. We note that reference was, and still is, to land located at “Karamea and Totara Flat”. We can confirm this land is in neither of those locations, and a considerable distance from Totara Flat and much further to Karamea.</p> <p>We have sought copies of technical reports as to how the designation was</p>	Remove the “highly productive land” designation from our property.

	<p>arrived at but no information has been forthcoming. This is with the exception of an email comment that the starting point was the land use capability index and we would be contacted further. Not further contact was received. We oppose the fact that the designation is arbitrary and not as a result of a sound technical assessment of such matters throughout the region.</p> <p>Having nothing concrete to review and submit on we have reviewed the landuse capability map for the land and surrounding area. The maps (attached) show the land and surrounding area as Class 6. We note that the Karamea land referred to in the plan appears to be Class 3 land only and excludes surrounding Class 4 land. It is also interesting 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”.</p> <p>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.</p> <p>We have reviewed the provisions of the plan in order to make further submissions however there are;</p> <ul style="list-style-type: none"> <li>• no definitions relate to this matter; including highly productive land, versatile soils, economic farming unit.</li> <li>• no land use rules or enabling provisions are proposed to allow us to intensify rural land use above general rural provisions.</li> <li>• 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.</li> </ul> <p>Our 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</p>	
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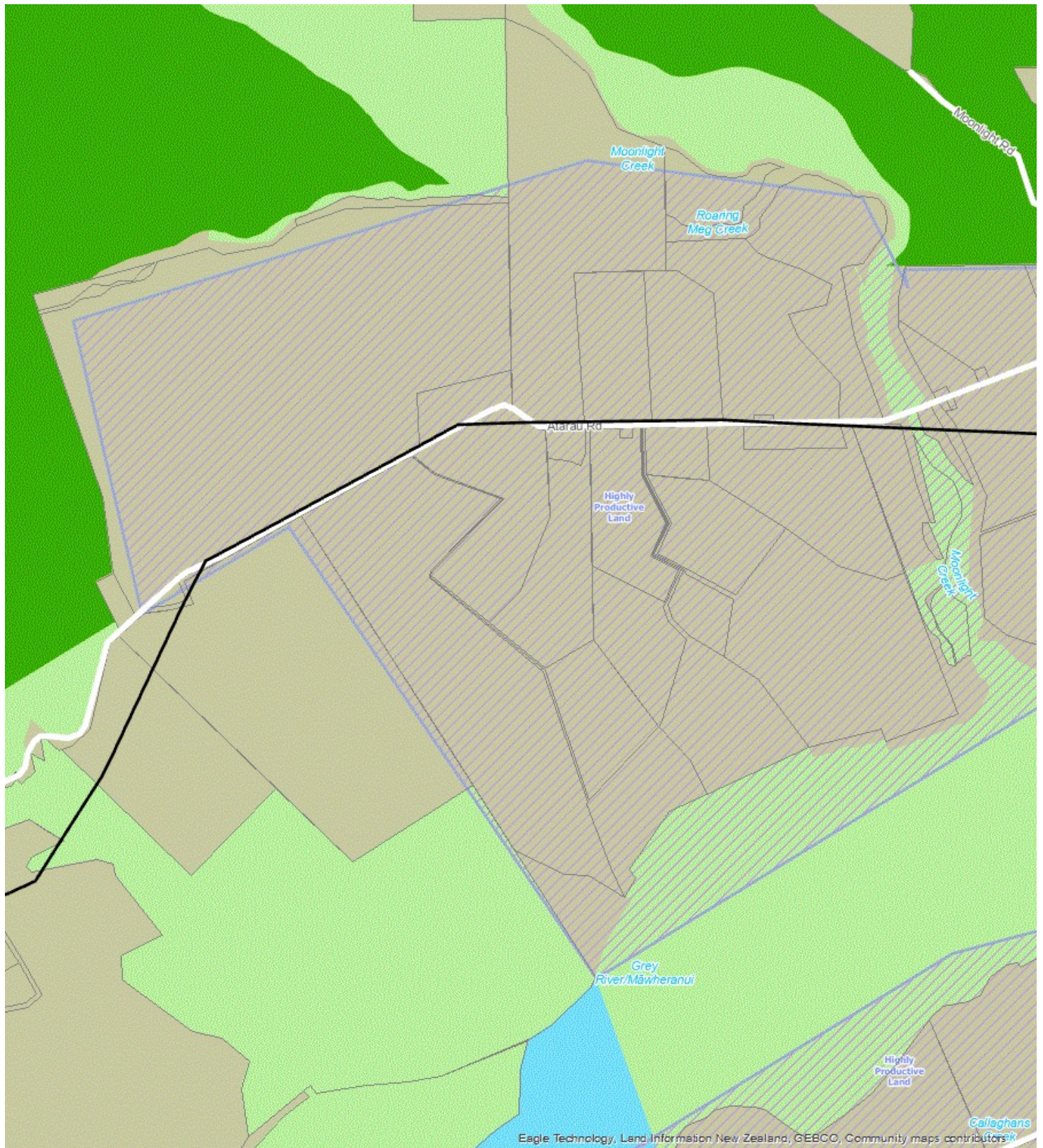
	<p>proposal. We consider this does not meet the requirements of the planning process under the Act, including Section 32 of the Act.</p> <p>There are however, as a result of the designation, restrictions on subdivision and residential unit density greater than for general rural land of a similar class throughout the region, and the Grey District. We 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 we object to the additional cost of having to deal with such issues given the lack of available foundation for such a designation.</p> <p>From a longer term perspective we note 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. We note that our 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. We consider our 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.</p> <p>We object to a 10 hectare subdivision limit on our land given the conditions. We consider this is not consistent with the existing pattern of land use in the area. We 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.</p>	
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Flood Plain			
Provision	Position	Reason	Requested Decision
<b>Planning Map</b> <b>SUB-R13</b> <b>Sub-R23</b>	Oppose	<p>Planning Maps show our land as being within a “Flood Plain”. The maps are clearly in error and we oppose that designation. We can confirm that were an event of such magnitude that all of the area shown to be flooded on the map to occur such an event would be catastrophic for a considerable portion of the built development in the District.</p> <p>We have sought information as to how the mapping was arrived at but none has been available 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. We object to having to face financial cost in the face of inaccurate information, when in fact no detailed technical information is available.</p> <p>Our 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. We consider this does not meet the requirements of the planning process under the Act, including Section 32 of the Act.</p> <p>We made comment to the draft plan and do note that the line has moved but it is still in error. Whilst this is not our issue we note the inaccuracy in other areas in the wider vicinity and have concerns for those landowners affected as to the implication of such designations.</p> <p>We have a building within the area shown as a flood plain and while we understand there are no land use rules we did have problems with inaccurate soil hazard maps when applying for building consent. This was a practice Council ceased not long after our project was completed but by that stage had added significant additional cost to our project based in incorrect mapping information. We cannot accept that situation arising again in relation to our land.</p>	Remove the “Flood Plan” designation from our land.

		<p>We are concerned regarding the potential insurance issues with inaccurate hazard mapping in the future should someone want to undertake more substantial building on that part of the site.</p> <p>We oppose that the incorrect notation can add additional cost to any subdivision proposals we may wish to undertake.</p>	
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




<b>National Grid Yard &amp; Related Rules</b>			
<b>Provision</b>	<b>Position</b>	<b>Reason</b>	<b>Requested Decision</b>
<b>Planning Map</b> <b>ENG-R7</b> <b>EW-R2</b> <b>SUB-R8</b>	Oppose	<p>While we understand the need for the rules it is unclear why those existing in relation to our property have not simply been reinstated.</p> <p>We were involved in the change to the Grey District Plan which introduced rules related to this matter. We object to having to work through the process again when in reality nothing has changed and the matter should have been quite straightforward.</p> <p>Whilst proposed subdivision provisions appear to be similar we note that earthworks provisions developed through the previous mediation process have now been lost and we oppose that. The land use rules appear to differ from those previously developed and we are concerned at having to lose the time and cost for little better outcome.</p>	Reinstate the rules from the operative Grey District Plan in regard to national grid matters.





























### Te Tai o Poutini Plan 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

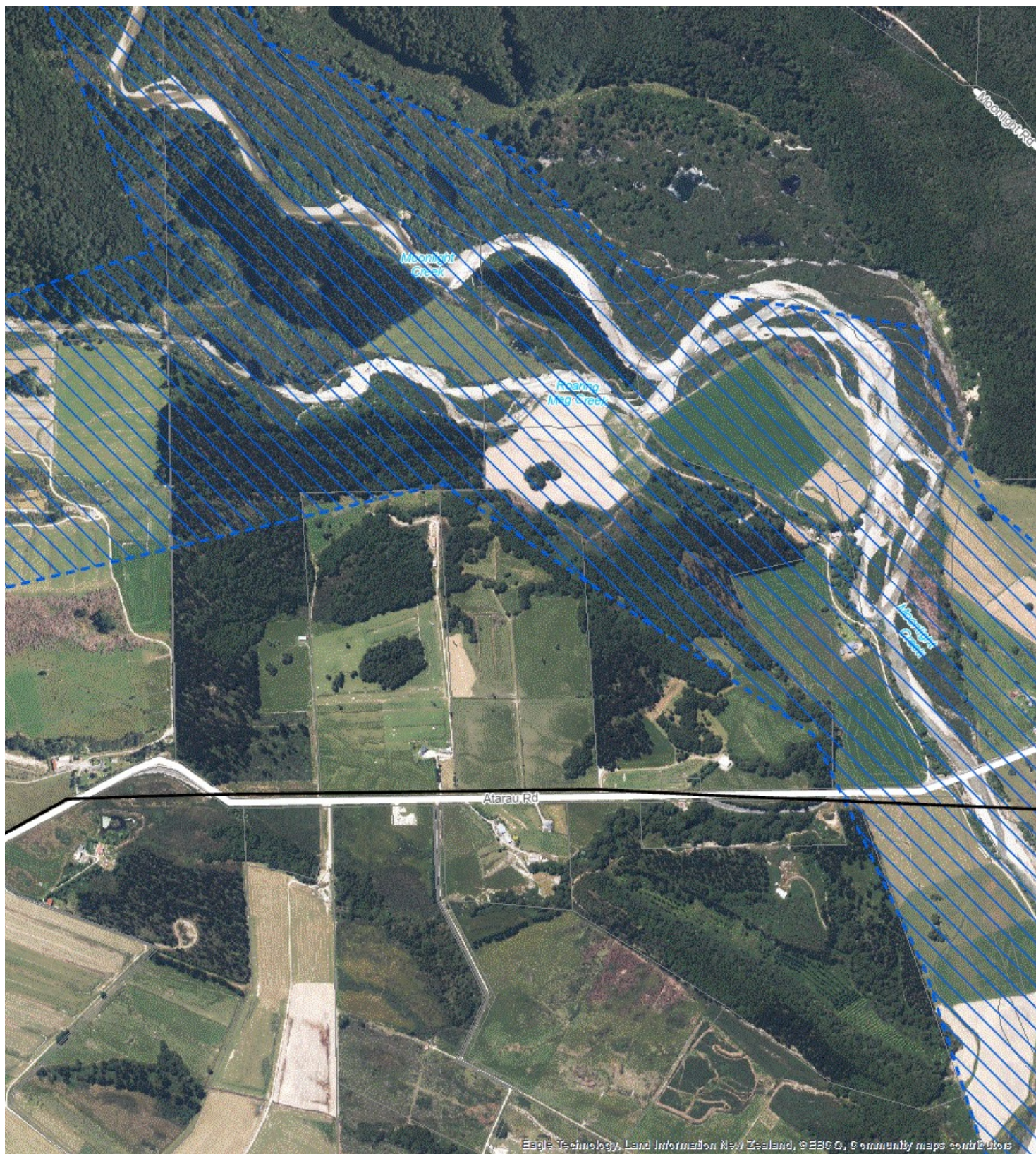


### Te Tai o Poutini Plan Zones

- Precincts  

- Rifle Range Protection Area  

- Hokitika Visitor Accommodation 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







### Te Tai o Poutini Plan Overlays

West Coast Boundary



National Grid



Significant Electricity Distribution Line



Airport Noise Contours



Airport Approach Paths



Flood Plain



Notable Trees



Archeological Area



Heritage Areas



Designations



### Property Boundaries

