

**SUBMISSION ON PUBLICLY NOTIFIED PROPOSAL FOR POLICY STATEMENT OR
PLAN, CHANGE OR VARIATION**

Clause 6 of Schedule 1, Resource Management Act 1991

To Buller, Grey and Westland District Councils

Name of submitter: Freehold Properties (Investments) LLP (FP)

- 1 This is a submission on the proposed Te Tai o Poutini Plan/West Coast District Plan (the **Proposed Plan**).
- 2 FP could not gain an advantage in trade competition through this submission.
- 3 FP's submission relates to the entire Proposed Plan.
- 4 FP seeks the following decision from the local authority:
 - 4.1 The relief as set out in **Annexure A**.
 - 4.2 Any other similar relief that would address the relief sought by FP.
 - 4.3 All necessary consequential amendments.
- 5 FP **wishes to be heard** in support of the submission.
- 6 If others make a similar submission, FP will consider presenting a joint case with them at a hearing.

Signed for and on behalf of Freehold Properties (Investments) LLP by its and authorised agents Novo Group



Helen Pickles
Senior Planner
19 September 2022

Address for service of submitter:

Freehold Properties (Investments) LLP
c/- Helen Pickles

Novo Group
Level 1
279 Montreal Street
PO Box 365
Christchurch 8140
Email address: helen@novogroup.co.nz


ANNEXURE A

The drafting suggested in this annexure reflects the key changes FP seeks. Consequential amendment may also be necessary to other parts of the proposed provisions.

FP proposes drafting below and seeks that this drafting, or drafting with materially similar effect, be adopted by the Council.

PLANNING MAPS

No.	Provision	Position	Submission	Relief Sought
1.	Zoning - GRZ (Lot 3 DP 426218)	Oppose	<p>The submitter opposes the proposed General Rural zoning proposed for the property at 2902 Franz Josef Highway, legally described as Lot 3 DP 426218.</p> <p>The Top 10 Holiday Park, Franz Josef located at 2902 Franz Josef Highway is owned by Nigel Keith Ross in his capacity as bare trustee and manager of Freehold Property (Investments) LLP. The holiday park has been operating in excess of 20 years.</p> <p>The established use of the site is not rural in nature and is not adequately recognised by the proposed General Rural zoning, noting that zone fails to adequately provide for the established visitor accommodation activity and its ongoing use and development.</p> <p>Land directly to the east of the site (on the opposite side of Franz Josef Highway) (refer to planning map below) is proposed to be zoned Settlement zone, and includes the existing Westwood Lodge at 2919 State Highway which is used for short term accommodation.</p> <p>Furthermore, the adjacent land to the immediate south of the holiday park site is not of a rural nature. As such, it is recognised by way of its designation for Franz Josef Glacier School (ref. MEDU26).</p>	<p>Zone the property (legally described as Lot 3 DP 426218 as Settlement Zone (SETZ) in its entirety.</p> <p>Any consequential changes that may also be required to other provisions in the proposed Plan in order to provide for the requested relief.</p>

No.	Provision	Position	Submission	Relief Sought
			<p>As such and accounting for relative costs and benefits, Settlement Centre Precinct zoning (SETZ - PREC2) is considered to be more efficient, effective and appropriate for the Top 10 Holiday Park site. It would provide a means to align with the established use and the exercised resource consents (ref: 960102 & 040149).</p> 	
2.	Flood Hazard Severe	Oppose	<p>The Top 10 Holiday Park site is located within the proposed Flood Hazard Severe Overlay. The submitter requests some provision within the Natural Hazard chapter to provide for addition and alterations to the existing commercial buildings currently on the site.</p>	<p>Amend the relevant Natural Hazard chapter provisions to provide for additions and alterations to the existing commercial buildings currently on the Top 10 Holiday Park site.</p>

No.	Provision	Position	Submission	Relief Sought
				Any consequential changes that may also be required to other provisions in the proposed Plan in order to provide for the requested relief.

