

TTTP Hearing 2nd August Scenic Hotel Group

Settlement Zone and its
Precincts (excluding the Franz Josef area)

Tourism does and can make an even bigger contribution to the West Coast economy,
Tourism fosters pride and is a catalyst for regional prosperity.

**To consider our opposition to the changes within the TPP.
You need to understand Scenic Hotel Group, our economic and social
contribution and the wider role we play in the communities where we
operate.**

Scenic's – economic and social contribution

- Scenic Hotels and Hospitality venues **employ 200 people** on the West Coast.
- We are the largest tourism employer and the 5th largest employer outside of government on the West Coast.
- **\$8.2 million** annual payroll to **West Coast employees**.
 - Our Average hourly rate is \$30.01. (*Living wage is \$26.00 in same period*)
- Scenic Hotel Group **provides staff accommodation to 150 of our 200** employees on the West Coast (excludes their family members)
- Our network of hotels and venues enable FIT & Tour itineraries to include the West Coast.
 - Year Ending June 2024 our west coast properties **accommodated 68,300 room nights with 125,909 guests**.
- These visitors to the region spend a majority of their time and money with West Coast businesses, attractions and service providers. Less than 12% of the visitor spend is in hotels.
- **Scenic spends \$580k+ pa**. Marketing/Sales spend specifically promoting the West Coast region and destination.
- **Annual rates of 730k**

Our commitment to the West Coast is multi-generational.

- We are economic realists. Demand and development economics have played a big role as to why we haven't developed out these sites sooner attributing to the impact of Covid and extended border closures.
- Scenic Hotel Group's submission opposes the planning and zone changes in the TTPP, as they will restrict the economic and community enabling improvements we are committed to in the region.
- Our future projects support the investment and vision of Department of Conservation, Ngāti Waewae and Council to build a visitor experience in Punakaiki.
- Scenic is committed to investing in the West Coast and its communities. Our future developments are good for the communities and go beyond Scenic's own business activity with worker accommodation, community facilities and leisure attractions, increasing the spend and length of stay in the region. Future projects include (Worker accommodation, spa, community hall, commercial laundry, minigolf).

Punakaiki Spa - Concept



Development of compatible leisure activities to the natural environment and carefully considered overnight accommodation to support Punakaiki's intended economic purpose.



Punakaiki Spa - Concept



Building a destination, curating a story and reason to stay and stay longer in the region. Complimenting existing facilities making them more efficient.



Future projects to improve housing and accommodation shortage in Punakaiki

All Nations Hotel Site, 2787 STATE HIGHWAY 6 (COAST ROAD) Barrytown



Quality healthy modern housing as staff and worker accommodation, to service the housing shortage and requirements to attract and retain good workers to support the local businesses.

Staff Houses 24 and 26 Punakaiki Road



Scenic Group owned and associated properties in the Punakaiki Settlement and Barrytown Settlement Zones, and the Punakaiki Special Purpose – Scenic Visitor Zone.

- **Punakaiki Beach Front Motels** - 12-14 Dickinson Parade, 56 Punakaiki Road, 2 and 4 Mabel Street
- **Punakaiki Rocks Hotel and Garden Bar** - 13-15 Owen Street,
- **Punakaiki Rocks Hotel and Garden Bar Houses** - 24 and 26 Punakaiki Road
- **Scenic Hotel Punakaiki** - State Highway 6, Rainforest Rooms (this includes the land on which the Punakaiki Spa & Accommodation will be erected)
- **All Nations Hotel Site** - 2787 State Highway 6 (Coast Road) Barrytown

The Problems Identified

Scenic Hotel Group's submission opposes the planning and zone changes in the TTPP, as they will restrict the economic and community enabling improvements we are committed to. We object to the following proposals.

1. Settlement Zone and Punakaiki Special Purpose – Scenic Visitor Zone - are too restrictive and not appropriate.

Punakaiki has been referred to by Buller District officials as a place of “national significance” due to its tourism industry. The village has over 700,000 visitors per annum and growing, it is the jewel in the crown of West Coast attractions.

Punakaiki cannot accommodate the volume of overnight visitors. This results in turning business away from Punakaiki and the region are against the aspirations of Council and Development West Coast.

The private business are entirely tourism related, either visitor accommodation or hospitality, activity venues. With less than 100 residents, majority of the houses are holiday homes or operating as visitor accommodation (Air BnB type). With fewer than 70 titles there is no new titles/sections to develop. Attributing to this the Settlement Zone doesn't capture the essence and economic activity taking place in Punakaiki. **Like Venice, there is nowhere else to build in Punakaiki.**

2. Recessed planes and height limits – the reduction in height limits from 10m to 7m across the Settlement Zone and the retention of the 7m limit in the Special Purpose Scenic Visitor Zone on developments are overly severe. An example of how the proposed limitations to height and recessed planes rules are impractical, is in the case of the Punakaiki Beachfront Motels. Part of this complex consists of 1950's former Ministry of Works houses that at some time in the past have been relocated to the site. They have now reached the end of their intended life. It is one of our future projects, to replace these with a new purpose-built motel facility. At the same time to improve our insurance score, our design proposes to raise the height of the motel unit to prevent the risk from flooding. Our intention would be to build a ground level carpark and then two levels of accommodation units above the carpark. As proposed in the TTPP this would not be achievable due to the 7m limit. Given there are no other titles available to develop and the further restriction in the following proposed rules below, any improvement of the existing facility is near impossible.

3. 1 residential per 1000m² site rule – too restrictive in a growth area with limited titles for development. These sites are very suited for further motel or staff accommodation development, typically involving a series of smaller units or singular larger buildings subdivided.

4. 100m² ground floor area restriction and the restriction on 50m² additions to existing buildings - too restrictive in a growth area. An example development to suit additional staff accommodation or motel accommodation is shown within this document. There is insufficient land in this settlement zone to accommodate projected visitor growth and/or the staff required to service this growth. To service this growth, a higher density of accommodation provision is required.

5. Maximum of 50m² of indigenous vegetation clearance – combined with the points above this restricts site development unreasonably. For the present rules to be relaxed to permit greater clearance but subject to conditions requiring approved replanting's.

The Relief Required

Our submission asks for a pragmatic approach to planning to encourage development that is good for the region and community. **TTPP needs to support economic enabling growth and future development. Fairness and reasonableness.** We request the following relief.

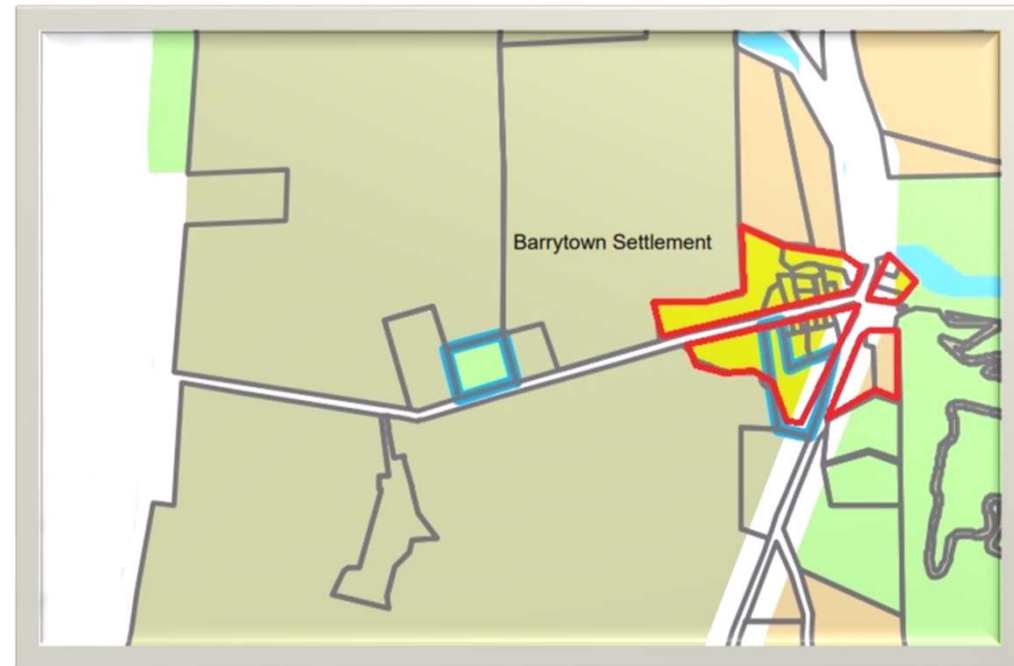
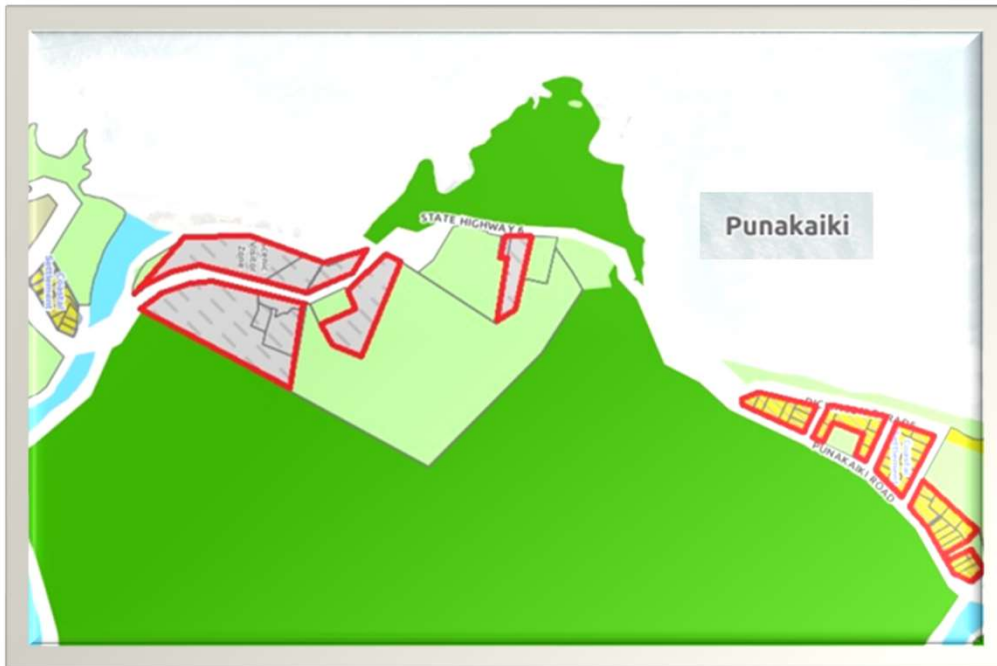
1. Establish a **Tourism & Visitor Zone (TVZ)** to accommodate the future scale and scope of tourist accommodation in the zone. (Map and detail below). Within the Tourism & Visitor Zone allow for the following rules.
2. **Recession planes and height limits.** Keep the current 10-meter height restriction. Measurement starts from (whatever is the highest) either the top of the foundations or the ground level. Increase the angle of the recession planes to increase densification of use on the small amount of settlement land available for development in Punakaiki. Precedent for this has been set with recession planes in the Christchurch City Council District Plan flood overlay, after the 2011 earthquakes, where new higher foundation levels were required. Scenic understands the details can be extracted from the CCC operative plan.
3. **1 residential per 1000m²**, increase the density within this rule as these sites are very suited for further motel or staff accommodation development, typically involving a series of smaller units or singular larger buildings subdivided. Combined with relaxing the GFA this density rule change will improve the development viability and contain the development of improved facilities to be within the existing titles, as opposed to causing inferior development on further away rural land.
4. **100m² ground floor area restriction and the restriction on 50m² additions to existing buildings** - too restrictive in a growth area. An example development to suit additional staff accommodation or motel accommodation is shown on the next slide. There is insufficient land in this settlement zone to accommodate projected visitor growth and/or the staff required to service this growth. To service this growth, a higher density of accommodation provision is required. It is noted that in drafting the TTPP we read that *“the single greatest issue raised in Settlements across the West Coast was the loss of housing to whole house rental visitor accommodation. In small settlements popular with tourists such as Punakaiki this has had a significant effect on the local community – as residents are unable to find housing. This impacts things such as the ability to get staff for businesses, volunteer fire brigades and overall community cohesion. It also has environmental effects as most of these settlements have old septic tank systems not designed for the types of peak flows that occur when a whole house is rented by visitors.*
5. **Maximum of 50m² of indigenous vegetation clearance** – replace with a rule, that accommodates that, land needs to be cleared for the erecting of new buildings and access to site during the construction phase. Once construction is complete native species are to be re-planted. The completed development will have retained and replanted indigenous tree or shrubs beyond 3 m from buildings. A great example of this is at our Te Waonui Hotel in Franz Josef, where native bush was preserved and site access areas replanted so that now the hotel is set in natural pristine native rain forest.

Tourism & Visitor Zone

Create a Tourism & Visitor Zone overlay across the Punakaiki Settlement Zone, Barrytown Settlement Zone and the Punakaiki Special Purpose Scenic Visitor Zone to enable scale of tourism activities and visitor accommodation facilities.

Introduce a Tourism & Visitor Zone as outlined on the maps in red.

Within the Tourism & Visitor Zone, planning rules allow for the existing titles to be carefully developed to underpin Punakaiki as a place of national significance for tourism. And to enable development at Barrytown Settlement area.



Summary

Scenic has invested highly and with purpose in Punakaiki and Barrytown. If something was to happen, and Scenic could not reinvest at a scale that is viable, then we would likely have no choice but to bypass Punakaiki and Barrytown and invest where we had more scope. The flight of capital and investor/developers in Christchurch after the earthquakes due to poor planning rules was significant and has caused a long lag in Canterbury's recovery.

We believe that our requested amendments to the TTPP, do provide for careful and thoughtful development to happen and support the fundamental purpose that has been widely signalled for Punakaiki as a well-managed significant tourism destination.