

31 January 2025

Rex Williams
Chair Te Tai o Poutini Plan Committee
Coastal Hazards Chapter – Variation 2 - Further Submissions
PO Box 66
Greymouth 7840

via email: info@tpp.nz

SCENIC HOTEL GROUP LIMITED – FURTHER SUBMISSIONS on pTTPP – Variation 2 – Coastal Hazards

Scenic Hotel Group Limited (**Scenic**) at the address for service set out below, lodged a submission on Variation 2 to the Coastal Hazards Chapter of the pTTPP following its renotification on 21 November 2024 (submitter #483).

Scenic wishes to make further submissions on Variation 2 to the Coastal Hazards Chapter of the proposed Te Tai o Poutini Plan (**pTTPP**).

The further submission points that Scenic wish to make are set out in the attached schedule.

Scenic **wishes to be heard** in support of its further submission.

If others make a similar submission, Scenic **would** consider presenting a joint case with them at a hearing.

Dated 31 January 2025



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ADDRESS FOR SERVICE:

Scenic Hotel Group Limited
c/- Planz Consultants
PO Box 1845
CHRISTCHURCH
Attn: Sam Flewellen
e-mail: sam@planzconsultants.co.nz

A copy of these further submissions have been provided (via e-mail) to the following submitters:

Submitter name	Submitter Number	Submitter e-mail
Te Tai o Poutini Plan Committee	171	doug.bray@wrc.govt.nz
Jane Whyte and Jeff Page	467	jane@responseplanning.co.nz
Department of Conservation	602	mbrass@doc.govt.nz
Biggles Limited	685	brett@townplanning.co.nz

Further Submission Schedule – Scenic Hotel Group Limited (#483)					
Original Submitter and No	Original Submission Point	Decision requested by Original Submitter	Support / Oppose	Reason(s)	Decision sought by Further Submitter
Te Tai o Poutini Plan Committee (s171)	S171.033	<p>The Coastal Hazard Overlay naming convention uses the terms:</p> <ul style="list-style-type: none"> • Coastal Severe Overlay • Coastal Alert Overlay and • Coastal Setback Overlay. <p>There has been suggestion from the community that this naming convention is not helpful and can be seen as alarmist.</p> <p>As such, it is sought that the name of these overlays are changed to reflect the risk or the coastal hazard process, as opposed to using terms like severe</p>	Support	Scenic agrees with the submitter that the naming convention could be seen as alarmist and risks pre conceived bias by planners when interpreting and processing future resource consent applications within these overlays.	To change the name of these overlays to better reflect the risk management approach in the policy framework e.g. Coastal Hazard Priority 1, Coastal Hazard Priority 2, or similar.
Jane Whyte & Jeff Page (S467)	S467.050	<p>As Variation 2 has altered the extent of the hazard overlays, and in some cases which hazard overlay applies it is appropriate for people who have properties affected by Variation 2 to be able to address all of the relevant provisions on the Plan that apply.</p> <p>Create a new policy for natural hazards alert overlay. Ensure that the policy recognises that the appropriate management response in the policies applying in the Coastal Hazard Alert areas is mitigation, not avoidance.</p>	Support	<p>Scenic also considers that where Variation 2 has altered the extent of hazard overlays on various properties, those property owners should have greater recourse to the relevant provisions in other chapters that may have otherwise been approached differently had the property owner known of the extent of the coastal hazard overlays.</p> <p>For example, this knowledge could have resulted in pursuing different densities, zonings and/or bulk and location standards elsewhere in Punakaiki to make more efficient and effective use of the small pockets of land</p>	<ol style="list-style-type: none"> 1. Remove the coastal hazard overlays from the TTPP until site specific natural hazard assessments can be completed, or 2. Remove the coastal hazard overlays and all other TTPP provisions from the Punakaiki area until a site-specific natural hazard engineering assessment can be completed and a workable and functional

				<p>that are less compromised by the coastal hazard overlays.</p> <p>As a result of the TTPP process and the timing of the different chapters, the TTPP, as it relates to Punakaiki has become increasingly restrictive and constrained to the point where large areas of land zoned for anticipated development are largely unworkable. This level of regulatory burden will add substantial costs and time to any potential development or redevelopment within these overlays.</p> <p>Greater certainty is therefore sought with regard to the science and reliability of the mapping as it relates to Punakaiki to ensure the regulatory intervention is justified otherwise the overlay and all other relevant provisions should be removed from this area, until this work is completed where they can then be revisited and considered as an integrated package.</p>	<p>set of provisions can be prepared via a separate Plan Change.</p>
Jane Whyte and Jeff Page (S467)	S467.051	That the activity status relating to natural hazard rules be Restricted Discretionary at the greatest, with discretion restricted to hazard mitigation and its extent.	Support	<p>Scenic has made similar requests in its submission suggesting that a Restricted Discretionary (in the Coastal Hazard Alert overlay) or at the most a Discretionary status (in the Coastal Hazard Severe overlay) would be more appropriate than what is currently proposed (discretionary and non-complying respectively).</p> <p>However, given any non-compliance with coastal hazard rules will focus exclusively on hazard mitigation and its extent, it is agreed that a singular restricted discretionary status</p>	<p>Amend the activity status for any activity in the Coastal Alert or Severe overlays (where not otherwise permitted or controlled) to restricted discretionary with discretion restricted to hazard mitigation and extent.</p>

				is more appropriate with regard to the rules subject to these overlays.	
Department of Conservation (s602)	S602.00247	<p>Amend Policy NH-P12:</p> <p>When assessing the effects of activities in natural hazard overlays consider:</p> <p>a. The effects of natural hazards on people, property and the environment;</p> <p>b. technological and engineering mitigation measures and other non-engineered options;</p> <p><u>c. Discouraging hard protection structures and avoiding hard protection structures in the Coastal Environment;</u></p> <p>d. The location and design of proposed sites, buildings, vehicle access, earthworks and infrastructure in relation to natural hazard risk;</p> <p>e. The clearance or retention of vegetation or other natural features to mitigate natural hazard risk;</p> <p>f. The timing, location, scale and nature of any earthworks in relation to natural hazard risk;</p> <p>g. The potential for the proposal to exacerbate natural hazard risk, including transferring risk to any other site;</p> <p>h. The functional or operational need to locate in these areas; and</p> <p>i. Any significant adverse effects on the environment of any proposed mitigation measures.</p>	Oppose	<p>Scenic has submitted specifically on NH-P12 but does not consider that this policy needs specific reference to hard protection structures as this is already addressed with more appropriate wording (i.e. a preference for natural solutions rather than hard engineering solutions recognising that in some circumstances, hard engineering solutions may be the only practical option) under NH-P3.</p> <p>There is also confusion in the request from this submitter whether they are seeking to 'discourage' or 'avoid' hard protection structures. Scenic does not consider either is necessary in this policy but in particular considers that any directive to 'avoid' these structures does not represent a practical or reasonable approach, particularly for Punakaiki.</p>	Decline the requested amendment to introduce a new clause (c) to NH-P12.
Biggles Limited (S685)	S685.001	The mapping subject to the Variation is opposed because:	Support	A large number of submitters have opposed the implementation of Coastal Hazard	1. Remove the coastal hazard overlays from the

		<ul style="list-style-type: none"> - Such mapping is inconsistent with the New Zealand Coastal Policy Statement (NZCPS); - The NIWA methodology informing the Variation overestimates coastal hazard risk, including uncertainties with respect to erosion and inundation; - There is a lack of site specific hazard risk - Policies 24 and 25 of the NZCPS are applicable; and - Consultation has been insufficient and ineffective. 		<p>overlays with many seeking that they be removed partly or fully.</p> <p>Scenic also shares the concerns of a number of submitters around the application of extensive overlays based on modelling rather than site specific assessments.</p> <p>Uncertainties with regard to the accuracy of the coastal hazard overlay modelling was raised in Scenic’s submission, particularly in relation to the location of the Coastal Hazard Setback overlay on their property (which has not been modelled but was added as a precaution) which does not seem to follow any obvious or defined features while covering elevated and developed land.</p> <p>While there are practicalities associated with undertaking site specific assessments which are acknowledged, the impact of the coastal overlays cannot be overstated in terms of the potential constraint it places over land, particularly Punakaiki.</p> <p>For Punakaiki this constraint creates tension with the intent of underlying zoning and will create a regulatory burden that will add substantial costs and time to any potential development or redevelopment within these overlays.</p> <p>Greater certainty is therefore sought with regard to the science and reliability of the mapping as it relates to Punakaiki to ensure the regulatory intervention is justified</p>	<p>TTPP until site specific natural hazard assessments can be completed, or</p> <p>2. Remove the coastal hazard overlays and all other TTPP provisions from the Punakaiki area until a site-specific natural hazard engineering assessment can be completed and a workable and functional set of provisions can be prepared via a separate Plan Change.</p>
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				<p>otherwise the overlay and all other relevant provisions should be removed from this area, until this work is completed.</p> <p>A site-specific hazard risk assessment is therefore considered appropriate as requested by submitter S685.</p> <p>Scenic also considers that where Variation 2 has altered the extent of hazard overlays on various properties, those property's owners should have greater recourse to relevant provisions in other chapters that may have otherwise been approached differently had the property owner known of the extent of the coastal hazard overlays. For example, this knowledge could have resulted in pursuing different densities, zonings and bulk and location standards elsewhere in Punakaiki to make more efficient and effective use of the small pockets of land that are not compromised by coastal overlays.</p>	
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