

**SUBMISSIONS ON VARIATION 2 TO THE TE TAI O POUTINI PLAN**  
**Under Clause 6 of the First Schedule of the Resource Management Act 1991**

**To:** West Coast Regional Council  
Buller District Council

**By email:** [info@tppp.nz](mailto:info@tppp.nz)

**Submitters:** Paparoa Track Services Ltd, Craig and Sue Findlay, Dion Findlay, Tim Findlay,  
Punakaiki Beach Camp Ltd

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**1. Submitters**

- 1.1 This submission is on behalf of Paparoa Track Services Ltd, Craig and Sue Findlay, Tim Findlay, Dion Findlay and Punakaiki Beach Camp Ltd (the submitters), we submit on Variation 2 to the Proposed Te Tai o Poutini Plan.
- 1.2 The submitters could not gain an advantage in trade competition through this submission.
- 1.3 The submitters own land at Punakaiki including 4 Owen Street, 12 Owen Street, 18 Dickinson Parade and 20 Punakaki Road and also operate the Punakaiki Beach Camp Limited on Crown land, and the buildings are leased from the Buller District Council.
- 1.4 This submission relates to Variation 2 to the Te Tai o Poutini Plan.
- 1.5 The reasons for the submission and the relief sought are set out below.
- 1.6 The suggested revisions do not limit the generality of the reasons for the submission.
- 1.7 The submitter wishes to be heard in support of this submission.
- 1.8 The submitter will consider presenting a joint case with others presenting similar submissions.

## 2. Overview

1.1 The submitters have lodged submission on Te Tai o Poutini Plan. This includes submissions addressing natural hazards including submissions on policies, rules and mapping that apply to the areas now affected by Variation 2.

1.2 The submissions lodged on the Te Tai o Poutini Plan sought a relaxation of the restrictions imposed by the Coastal Hazard Alert and Coastal Hazard Severe overlays, in particular the finished floor requirements and the lack of other mitigation measures being allowed for within this zone. The submitter also seeks a provision allowing for relocatable buildings which do not meet the requirements for finished floor levels, as they can be moved as a part of managed retreat. These issues remain live as part of Variation 2.

1.3 It is understood that the submissions already lodged on matters now addressed as part of Variation 2 will also be considered as well as these submissions on Variation 2.

## 2. Submissions and Relief sought

2.1 The specific provisions related to Variation 2, supported or opposed and the decision sought is provided in below:

<i>Provision</i>	<i>Support or Oppose</i>	<i>Reasons and Decision Sought</i>
Natural Hazard Map: Coastal Hazard Severe	Oppose in Part	Any area where the Coastal Hazards Severe Overlay has been extended over residential property in Punakaiki or the Punakaiki Beach Camp, beyond that prior to Variation 2 is opposed.
Natural Hazard Map: Coastal Hazard Severe	Support in Part	Any area where the Coastal Hazards Severe Overlay has been reduced over residential property in Punakaiki or the Punakaiki Beach Camp, beyond that prior to Variation 2 is supported.
Natural Hazard Map: Coastal Hazard Severe as it applies to 4 Owen Street	Oppose	The mapping in relation to 4 Owen Street does not allow the location of the overlay boundaries to be determined on the ground as there is no discernible topographic or legal feature, as such are uncertain and in capable of consistent administration.  The Coastal Hazard Severe notation should be removed from the property at 4 Owen Street.
Natural Hazard Map: Coastal Hazard Alert	Support in Part	Any area where the Coastal Hazards Severe Alert has been reduced over residential property in Punakaiki or the Punakaiki Beach Camp, beyond that prior to Variation 2 is supported.

<p>Variation 2 relationship with notified District Plan</p>	<p>Oppose</p>	<p>While the focus of Variation 2 is on mapping, the relationship of the mapping with other provisions must be considered.</p> <p>The mapping identifies which rules apply to land, and the rules implement the policies and objectives.</p> <p>It is our understanding that the rules that apply to the land within the Coastal Hazard Severe, and Coastal Hazard Alert overlays will be considered at the same hearing as Variation 2.</p> <p>However, as a submitter it is concerning that the hearings on the objectives and policies that will apply to these areas are subject to a Section 42A report that has been issued even before submissions on Variation 2 have closed. The hearings are also scheduled to be completed likely in advance to the further submissions on Variation 2 being sought. This seems unfair that the range of submissions on provisions affecting the Coastal Hazard Severe, and Coastal Hazard Alert overlays will not be able to be considered together.</p>
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2.2 In addition to the above any alternative, consequential, or necessary additional relief to give effect to the matters raised generally in this submission is also sought.



Signature of person authorised to sign on behalf of submitter (Paparoa Track Services Ltd, Craig and Sue Findlay, Dion Findlay, Tim Findlay, Punakaiki Beach Camp Ltd)

Date 30 August 2024