

Submission on Notified Proposal for Plan, Change or Variation

Clause 6 of Schedule 1, Resource Management Act 1991

To: Timaru District Council

Name of submitter:

Tosh Prodanov

This is a submission on the following proposed plan or on a change proposed to the following plan or on the following proposed variation to a proposed plan or on the following proposed variation to a change to an existing plan) (the 'proposal'):

Timaru Proposed District Plan – notified 22nd September 2022

I ~~could~~/could not* gain an advantage in trade competition through this submission.

*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.

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

NH-O1 Areas subject to natural hazards

NH-P10 High Hazard Areas

RELO-R2 Placement of a shipping container

CE-P14 Hard engineering natural hazard mitigation within the Coastal Environment

My submission is:

- NH-O1 Areas subject to natural hazards – [1] should be amended to “*avoided and/or mitigated in high hazard areas; and.*” – South Rangitata Huts is in a High Hazard Area and objective NH-O1, as currently worded, does not allow for mitigation of Natural Hazards, which must be allowed given the 114 huts, families, over 100 years of history and local culture, and tens of millions of dollars’ worth of property concerned.
- NH-P10 High Hazard Areas [2.b] should be removed - South Rangitata Huts is in a High Hazard Area and policy NH-P10 as currently worded, does not allow for mitigation, which must be allowed.
 - Alternatively remove the word “*use*” from NH-P10 to allow for mitigation in High Natural Hazard Areas such as South Rangitata Huts where community scale hazard mitigation is necessary to protect existing communities from natural hazard risk which cannot reasonably be avoided.
 - Alternatively remove the “High Hazard Area” designation from South Rangitata Huts, thereby enabling Natural hazard mitigation works at South Rangitata Huts under NH-P9 which is otherwise prevented by NH-P10.
- RELO-R2 Placement of a shipping container CON-2 Total area of shipping container should be increased from 20m² to 30 m² to allow for 40ft containers to be used as batches or replacement huts for example at South Rangitata Huts. Such would be removable in time, enabling continued use of existing sites possibly for several decades while allowing the value of the investment in a quality container home/bach to be preserved by being removable from the site in the event this was eventually necessary. Shipping

container baches and relocatable buildings provide an ideal option for this, provided they meet a reasonable standard.

- CE-P14 Hard engineering natural hazard mitigation within the Coastal Environment – Remove the word “immediate” from [3]. Hard engineering natural hazard mitigation clearly must be done in advance, preferably years or decades in advance of “...immediate risk to life or property from the natural hazard” and cannot be left until the risk is immediate, surely this is self-evident.

I seek the following decision from the local authority:

- NH-O1 Areas subject to natural hazards – [1] should be amended to “avoided and/or mitigated in high hazard areas; and..”
- NH-P10 High Hazard Areas [2.b] should be removed.
 - Alternatively remove the word “use” from NH-P10 to allow for mitigation in High Natural Hazard Areas such as South Rangitata Huts where community scale hazard mitigation is necessary to protect existing communities from natural hazard risk which cannot reasonably be avoided.
 - Alternatively remove the “High Hazard Area” designation from South Rangitata Huts, thereby enabling Natural hazard mitigation works at South Rangutata Huts under NH-P9 which is otherwise prevented by NH-P10.
- RELO-R2 Placement of a shipping container CON-2 Total area of shipping container should be increased from 20m2 to 30 m2 to allow for 40ft containers.
- CE-P14 Hard engineering natural hazard mitigation within the Coastal Environment – Remove the word “immediate” from [3].

I do not wish to be heard in support of my submission.

[*In the case of a submission made on a proposed planning instrument that is subject to a streamlined planning process, you need only indicate whether you wish to be heard if the direction specifies that a hearing will be held.]

If others make a similar submission, I will consider presenting a joint case with them at a hearing.



Signature of submitter

Date 31st December 2022

Electronic address for service of submitter: tosh@inet.net.nz Telephone: 021-032-7079

Postal address (or alternative method of service under s352 of the Act):

495 Bower Avenue
Parklands
Christchurch 8083

Contact person: [name and designation, if applicable]

Tosh Prodanov, Hut Holder, Hut 67 South Rangitata Huts Reserve

Submission on the Proposed Timaru District Plan (September 2022)

By Tosh Prodanov, Hut Holder of Hut 67, 150 Rangitata Huts Road

15th December 2022

Background

As a hut holder at Rangitata Huts I am affected by matters and rules contained within the proposed District Plan that affect the Huts. As my batch is close to the sea I am highly affected by policies relating to mitigation of natural hazards and rules in regard to replacement of huts. Below is an outline of the issues I that I would like the Council to give regard to in formulating the new District Plan.

Risks to the Rangitata Huts Reserve

1. Coastal erosion / inundation
2. Flooding from the river
3. Fire risk from accumulated driftwood

Options for dealing with risks / loss of huts to natural hazards

1. Provide for mitigation of natural hazards at Rangitata Huts by Council and/or Ecan within the proposed District Plan.
2. Allow provisions and rules within the District Plan that allow hut holders to comprehensively and effectively mitigate risk from natural hazards at their own cost.
3. Allow the Rangitata river mouth to be opened / directed to the centre, or even South, rather than always to the North, allowing natural buildup / accretion of the beach in front of the reserve thereby enhancing a natural barrier to erosion and inundation.
4. Allow replacement / rebuilding of existing huts on their existing site.
5. Allow transportable / relocatable / tiny homes as options for replacement of existing huts. This could be an ideal solution for those hut holders that want to stay on their existing site with the ability to move the transportable / relocatable / tiny home off the site if/when conditions become worse in the future, thus saving a large portion of their financial investment.
6. Provide replacement sections in the adjoining paddock for those hut holders that lose the ability to remain on their existing site due to natural hazard.

Most of these options come at no cost to Council, they simply require that Council not impose draconian rules that tie hut holders hands i.e. the Council becomes a positive factor rather than negative one, one that allows hut holders reasonable choices rather than only dictating what can't be done.

Concerns in regard to sections of the current operative District Plan

It is highly concerning that Part D Rules 5.3.5.1 and 5.3.3.6 of the current operative District Plan create a prohibition on replacement of approximately half of the over one hundred and ten huts in the reserve, including my own.

The problems with this are;

1. This paves the way for the eventual destruction and elimination of the Rangitata Huts community.

2. As far as I am aware no consultation on this was carried out with stakeholders/hut holders or their representative committee before implementation of this rule. I am not aware that hut holders were even advised of this matter which has a major impact on their lives and investments.
3. Most insurance policies only pay replacement value if rebuilding on the same site. Given the current rule makes rebuilding on the same site prohibited by Council for about half of hut holders, these hut holders will likely receive only indemnity value in the event of loss. This likely means the difference between several hundred thousand dollars and virtually nothing, to the hut holder's wallet. Therefore the Council's actions with the above rules effectively costs affected hut holders significant financial loss in the event they need to make an insurance claim. This is highly concerning.

Note I have not been able find specific rules relating to Rangitata Huts within the proposed plan which correspond to existing sections of the currently operative plan as above. I am unclear as to why there appears to be no equivalent section.

Rangitata Huts Reserve Management Plan overdue

As I understand it the Reserve Management Plan for South Rangitata Huts was due for review in 2013 and this has not yet been done. The issues in this submission are issues that could be dealt with in that review. Consultation on these matters with, and listening to, stakeholders i.e. the hut holders and the committee representing hut holders, is an important part of the review process. As far as I am aware little in the way of consultation and engagement on these important issues has occurred. Nothing positive of substance has come from Council in regard to dealing with natural hazards at Rangitata Huts that can allay hut holders fears and concerns as to Councils intentions.

Other reasons for Council to maintain the viability of the Rangitata Huts

Cultural values

The long history of the South Rangitata Huts continues not only as fishing huts but also as part of people's family traditions which have been ongoing for generations. For many of us it is the equivalent of our "Turanga wai wai". Many huts, including my own are imbued with authentic Kiwi-ana, the real New Zealand of years past, and some could be considered historic cultural buildings. These assets and values are worth investing in and protecting for future generations.

Historic values

Rangitata Huts has a history that goes back over 120 years. My bach at Hut 67 is thought to be the first hut, and was built in the late 1800's by Charles Nicholas Charles who entertained prominent figures at Rangitata Huts. He had eleven children and still has descendants in the area. The Council appointed it's Heritage Consultant Anne McEwan to investigate the history of my hut which she did in July 2021 uncovering even more of it's, and the South Rangitata Hut's deep and rich history.

Health benefits of seaside living and recreation at Rangitata Huts

Living and enjoying recreation by the sea, which is what Rangitata Huts is all about, is increasingly being recognised by science as having positive effects on peoples mental health and well-being. This is something the Council should encourage and invest in by committing to positively partnering with hut holders at South Rangitata Huts to ensure its future is protected.

<https://www.rnz.co.nz/national/programmes/sunday/audio/2018869769/catherine-de-lange-spending-time-near-water-is-beneficial-to-our-mental-health>

Jane Marine

From: Tosh Prodanov <tosh@inet.net.nz>
Sent: Saturday, 31 December 2022 9:11 pm
To: PDP
Cc: Matthew Hall
Subject: Re: Submission on the Proposed Timaru District Plan 15th December 2022 by Tosh Prodanov Hut 67 Rangitata Huts
Attachments: Submission on the Proposed Timaru District Plan 2022 by Tosh Prodanov - Hut 67 Rangitata Huts.pdf
Follow Up Flag: Follow up
Flag Status: Flagged

Dear Timaru District Council,

Please find attached my submission on the Proposed Timaru District Plan on the requisite Form 5 as per below.

Yours faithfully,

Tosh Prodanov

Mobile: 021 032 7079

Email: tosh@inet.net.nz

Alternate email: toshprodanov@gmail.com

----- **Original Message** -----

From: PDP <pdp@timdc.govt.nz>

To: Tosh Prodanov <tosh@inet.net.nz>

Sent: 19/12/2022 10:47:05 am

Subject: RE: Submission on the Proposed Timaru District Plan 15th December 2022 by Tosh Prodanov Hut 67 Rangitata Huts

Good Morning Tosh,

Thank you for your submission . Please find the submission Form 5 that tis required to accompany all submissions and fill it out and email it back with the original submission so that your submission can be complete.

Thank you.

Regards



Timaru District Council | PO Box 522 | Timaru 7940
P: 03 687 7200 | W: www.timaru.govt.nz

From: Tosh Prodanov <tosh@inet.net.nz>
Sent: Thursday, 15 December 2022 4:23 pm
To: PDP <pdp@timdc.govt.nz>
Cc: Matthew Hall <mchadhall@xtra.co.nz>
Subject: Submission on the Proposed Timaru District Plan 15th December 2022 by Tosh Prodanov Hut 67 Rangitata Huts

Dear Timaru District Council,

Please find attached my submission on the Proposed Timaru District Plan.

I understand it is not in the prescribed Form 5, this is because my submission did not fit tidily within the parameters of the form, however I believe it has relevance to the Council's Proposed District Plan with regards to the South Rangitata Huts.

Regards,

Tosh Prodanov

Mobile: 021 032 7079

Email: tosh@inet.net.nz

Alternate email: toshprodanov@gmail.com