

PLANNING EVIDENCE - ADDENDUM

IN THE MATTER OF Proposed Te Tai o Poutini Plan (pTTPP)

AND

IN THE MATTER OF A hearing into the above pursuant to the Resource Management Act 1991

DATE OF HEARING 27 October 2023

**FURTHER COMMENT TO S42A REPORTING OFFICER'S RESPONSE
IN RELATION TO MINUTE 16 – STRATEGIC DIRECTIONS ARISING
FROM THE PROPOSED TE TAI O POUTINI PLAN HEARING**

TOPICS:

Minutes 16 & 22 – Strategic Directions

**Evidence of Martin Kennedy
for Westpower Ltd**

Comment on matters arising from Minutes 16 & 22 and a response by the s42A Reporting Officer in relation to Strategic Direction matters raised by the hearing panel

- 1.0 The hearing panel have sought, through Minute 22, any further comments from submitters to matters arising from a review of “*Strategic Direction*” matters in the pTTPP by the s42A Reporting Officer. That review was requested by the panel through Minute 16.
- 1.1 Westpower was a submitter, and further submitter, to the Strategic Directions section of the proposed plan and raised a number of the issues that have been considered through the review undertaken. Westpower have requested that I review the response and provide additional comments where required.
- 1.2 In providing these comments I reiterate my evidence in regard to the “*Strategic Direction*” matters and my opinions offered where there are differences in outcomes sought between my evidence and that of the s42A Report and review. A number of these matters were discussed at the hearing arising from the s42A Report and my evidence. My evidence, including attachments, set out the amendments sought and matters arising from the submissions of Westpower Ltd and those remain.
- 1.3 Having reviewed the response from the s42A Reporting Officer it would appear that the matters arising are related to;
 - i) the role of strategic directions
 - ii) form of strategic directions – objectives and policies
 - iii) whether there should be strategic direction for economic development in general
 - iv) natural hazards and climate change directions

Role of Strategic Directions

- 1.4 There panel sought advice from the s42A Reporting Officer as to whether there was a hierarchy between the “*strategic directions*” and objectives and policies throughout the plan. The s42A Reporting Officer has concluded, based on court decisions, that there is no hierarchy between strategic directions and other policies and objectives and to ensure this recommends removing the statement in each strategic topic that,
For the purposes of preparing, changing, interpreting and implementing Te Tai o Poutini Plan all other objectives and policies in all other chapters of Te Tai o Poutini Plan are to be read and achieved in a manner consistent with these strategic objectives.

- 1.5 I disagree with that recommendation. The paragraph does not seek that the strategic directions take precedence over all other matters but that, when undertaking planning activities, objectives and policies throughout the plan are implemented in accord with, *ie read and achieved in a manner consistent with ...*, the strategic matters identified as key resource management issues for the region. Accordingly that paragraph should be retained in each instance to guide decision making and implementation of the plan.

Form of Strategic Directions – Objectives and Policies

- 1.6 This section of the pTTPP contains a mix of provisions, although the majority are set out as “*Strategic Objectives*”. Westpower made a range of submissions, and further submissions seeking both amendments and additions to these provisions. This included both amended and additional “*strategic objectives*” and new “*strategic policies*”, particularly related to energy activities/critical infrastructure/regionally significant infrastructure. Westpower also supported additional strategic objectives and policies regarding sustainable communities and the use and development of resources.
- 1.7 These matters were extensively covered in evidence to the hearing and so will not be repeated here. Nothing arising in the review has changed the opinions and evidence submitted at the hearing in this regard. In my opinion there are sound reasons for providing both “*Strategic Objectives*” and “*Strategic Policies*” in this section of the plan to achieve the consistent resource management outcomes sought across the region, including at the regional policy scale. The form of amendments is as set out in that earlier evidence, including attachments.

Strategic Directions for Economic Development in general

- 1.8 Whilst it is agreed that there are sound reasons to provide strategic direction to the activities (*ie mining, agriculture and tourism*) identified Westpower also supported submissions from Development West Coast seeking strategic objectives and policies regarding “*sustainable communities and the use and development of resources*”. Westpower’s support for such provisions remains to ensure a diversity of activities across the region is enabled in a sustainable manner. Westpower notes that this is a significant resource management issue identified in the West Coast RPS. Evidence submitted in relation to these matters remains unchanged and amendments are recommended to give effect to regional policies.

Natural Hazards and Climate Change directions

1.9 With regard to Natural Hazard matters Westpower considers that there is already an extensive section of the plan related to these matters. These matters are subject to an upcoming hearing which will likely result in some further refinement of those provisions. Based on the s42A Officers review there is also work occurring at both the national and regional level regarding natural hazards and these processes should be completed and used as the basis for any further amendment, if required, at the strategic level. Westpower would be concerned with additional matters arising through Strategic Directions, particularly in relation to its linear infrastructure, when such matters are being considered through development of the proposed natural hazard provisions already in the plan. Noting, as mentioned above, that hearing of submissions in regard to these matters is outstanding.

1.10 With respect to other climate change matters Westpower considers that its activities assist to manage effects of climate change through the generation and distribution of renewable energy to the community. All of which are matters that have been canvassed through its submissions and evidence to the pTTPP process.

Conclusion

1.11 Westpower is available to discuss and be heard on these issues further should it assist understanding and progress toward a sustainable outcome for the region.