

23 September 2024

Independent Hearings Panel
Proposed Te Tai o Poutini Plan
PO Box 66
Greymouth 7840

By email to: chu.zhao@wrc.govt.nz

Dear Commissioners,

Proposed Te Tai o Poutini Plan – Topic 19B (Coastal Environment)

The statutory function of the New Zealand Transport Agency Waka Kotahi (NZTA) under the Land Transport Management Act 2003 (LTMA) is to undertake its functions in a way that contributes to an effective, efficient, and safe land transport system in the public interest. NZTA must also carry out its functions in a way that delivers the transport outcomes set by the Government which are provided in the Government Policy Statement on Land Transport 2024-2034 with the key priorities being:

- Economic Growth and Productivity
- Increased Maintenance and Resilience
- Safety
- Value for Money.

NZTA maintains and operates the state highway network throughout New Zealand, and it is a core part of the transport network within the West Coast Region, which is recognised as both critical infrastructure and regionally significant infrastructure. Much of the state highway network is within or in close proximity to the Coastal Environment in the West Coast Region and it is a lifeline utility to provide for the movement of people, goods and services.

A submission was made by NZTA on the Proposed Te Tai o Poutini Plan – West Coast District Plan (TTPP) on the 2 November 2022. Submission points were made on the Coastal Environment chapter, which both supported and sought amendments to the proposed provisions.

In particular, NZTA made a submission on CE-P3 which sought to amend the policy to better recognise critical infrastructure that has a functional or operational need to locate within the Coastal Environment. The Council Reporting Officer, Ms Easton, has recommended that this submission point be rejected. The reasoning for this recommendation is that the West Coast Regional Policy Statement (RPS) enables activities within the Coastal Environment that relate to the National Grid and renewable electricity activities, not regionally significant or critical infrastructure.

While NZTA typically relies on its designation for the maintenance, repair and operation of state highways, there are instances where there is associated state highway infrastructure within the Coastal Environment that sits outside of the designation, such as coastal protection (sea walls) and stormwater infrastructure of which has a functional and operational need. It is considered that the current recommendation of Ms Easton does not sufficiently provide for regionally significant or critical infrastructure more broadly.

Policy 5 of the RPS recognises that in some cases it may be appropriate for new infrastructure to be located in, or traverse parts of, a sensitive environment to achieve a net benefit, or lower overall adverse effects. It is considered that this policy anticipates some effects could occur within the Coastal Environment being a sensitive environment, which is applicable to infrastructure more broadly than that of the National Grid and renewable energy activities. Therefore, it is considered by

NZTA that CE-P3 should more broadly capture critical infrastructure or regionally significant infrastructure where it has an operational and/or functional need within the Coastal Environment.

In relation to the other submission points raised by NZTA on the provisions in the Coastal Environment chapter, NZTA is comfortable with the recommendations outlined in the Section 42A Report and provides no further comment.

NZTA does not wish to be heard at the hearing on this topic and requests that this letter be tabled as a record of NZTA's position. However, if there are any particular questions that the Hearing Panel has in relation to this letter, then we can be available to assist as necessary.

Yours sincerely



Stuart Pearson

Senior Planner

Poutiaki Taiao / Environmental Planning, System Design, on behalf of Waka Kotahi New Zealand Transport Agency.