

**FURTHER SUBMISSION IN SUPPORT OF, OR IN OPPOSITION TO, A  
SUBMISSION ON VARIATION 2: COASTAL HAZARDS TO THE  
PROPOSED TE TAI O POUTINI PLAN (TTPP)**

**Clause 8 of Schedule 1 Resource Management Act 1991**

**To:** Te Tai o Poutini Plan Team  
**Address:** 388 Main South Road, Paroa, Greymouth 7805  
**Email:** [info@tpp.nz](mailto:info@tpp.nz)  
**Phone No.** (03) 768-0466 or 0508 800 118

**Further Submitter Details**

**Name of further submitter:** Westpower Limited  
**Contact person (if different from above):** Martin Kennedy  
**Postal address:** C/- West Coast Planning Ltd, 6 Dowling Road, Greymouth 7805  
**Email address for service:** MartinK@xtra.co.nz  
**Phone number:** 027596036

*The TTPP team will serve all formal documents by email. Where there is no email address provided, the documents will be posted to the postal address stated above.*

**I am a person or organisation who lodged a submission on the Variation, following its initial public notification on 27 June 2024:** *(please tick relevant box)*

a) Yes

**X**

b) ~~No~~

**I am a person or organisation who lodged a submission on the Variation, following its initial public notification on 21 November 2024:** *(please tick relevant box)*

a) Yes

**X**

b) ~~No~~

*If neither of the above apply, please state the grounds as to why you believe you have the right to lodge a further submission on this matter:*

Westpower is a community owned and operated renewable electricity generation and distribution company undertaking activities throughout the West Coast region which are impacted by the provisions of the proposed plan. Westpower is a submitter to the proposed TTPP and the associated variations.

**Please note that further submissions can also be lodged by:**

- **Any person or organisation representing a relevant aspect of the public interest**
- **Any other person or organisation that has an interest in the Variation that is greater than the interest that the general public has; or**
- **Local authorities affected by the Variation.**

**TTPP Hearing** *(please tick relevant box)*

Do you wish to be heard in support of your further submission?

**Yes**

If others make a similar submission would you consider presenting a joint case with them at a hearing? **Yes**

**Submission**

The submission points, support or opposition, reasons and decisions sought are set out in the attached document. **Note:** Any attachments to your submission should only be supporting information, not the submission.



31 January 2025

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***Signature of the person making further submission or  
the person authorised to sign on behalf of the person  
making further submission.***

---

***Date***

**Name of Further Submitter:** Westpower Limited

My specific further submission(s) are as follows: *(Please only insert one further submission point per line. Add further sheets as required)*

I support/oppose the Submission of: Department of Conservation (S602)

<b>The particular part of the submission I support/oppose are:</b> <i>(State the Submission No./Point no. of the original submission you support or oppose, together with any relevant provisions of the proposal)</i>			<b>The reasons for my support / opposition are:</b> <i>(State the nature of your further submission, giving reasons)</i>	<b>I seek that the whole (or part) of the submission be allowed / disallowed:</b> <i>(Give precise details of the decision you want TTPP to make)</i>
<b>Sub No. / Point No.</b>	<b>Support / Oppose</b>	<b>Provision</b>		
S602.00242	Oppose	Natural Hazards	The submission does not set out which provisions, and the details of the amendments sought, are the focus of this submission. This is because the focus of this variation is limited to matters related to the Coastal Hazard – Severe, Alert & Setback and related rules and provisions. All other matters have been included in the previous “Natural Hazards” Hearing and also the “Coastal Environment” in relation to mitigation structures.	Disallow the submission point
S602.00243	Oppose	Natural Hazards Objectives	The submission seeks a new objective related to all natural hazards. The variation is in relation to coastal hazards. The proposed objective repeats, or is a variation of matters, in the existing proposed objectives, for which a hearing has been held but no decisions made. The proposal has the potential to impact that process. The impact of the proposed amendment on other provisions has not been considered.	Disallow the submission point
S602.00247	Oppose	NHP12	The submission seeks to add a new matter for consideration in all overlays, and the coastal environment, which is different to the overlays the subject of this variation. This also impacts the coastal environment chapter; which contains provisions regarding hazard mitigation structures, which has been subject the hearings, and where there is no further ability to comment. The submission does not address the impact of such an addition and would be in conflict	Disallow the submission point

			with other consideration matters.	
S602.00248	Oppose	NHR2	The submission seeks to reduce the scale of earthworks and land disturbance needed to repair, maintain or operate existing mitigation structures. This is not limited to activities within the 3 overlays subject to the variation, seeks to add additional provisions to those already in the coastal environment chapter (for which hearings have already been held), does not recognise that such works are a component of activities within the region, and does not recognise that some work may be needed outside the structures footprint to achieve the activities provided for in the rule. These matters have already been part of the 'natural hazards' hearing.	Disallow the submission point
S602.00249	Oppose	NHR3	The submission seeks to reduce the scale of earthworks and land disturbance needed to upgrade existing mitigation structures. This is not limited to activities within the 3 overlays subject to the variation, seeks to add additional provisions to those already in the coastal environment chapter (for which hearings have already been held), does not recognise that proposed clause 4, and does not recognise that such works are a component of activities within the region. These matters have already been part of the 'natural hazards' hearing.	Disallow the submission point
S602.00251	Oppose	NHR4	The submission seeks to remove the ability to install new mitigation structures across the region. This is not limited to activities within the 3 overlays subject to the variation, seeks to add additional provisions to those already in the coastal environment chapter (for which hearings have already been held) and does not recognise that such works are a component of activities within the region. These matters have already been part of the 'natural hazards' hearing.	Disallow the submission point
S602.00252	Oppose	NHR5	This submission is linked to the submission under NHR4 and the same matters apply.	Disallow the submission point
S602.00253	Oppose	NHR38	The submission seeks to remove the ability to reconstruct buildings and place the onus on	Disallow the submission point

			landowners to demonstrate such should be allowed. This is a significant change for the community and does not address the impacts and implications of such proposals.	
S602.00255	Oppose	NHR50	The submission seeks to amend proposed Rule NH-R50 which is not part of the proposed Variation, and was addressed at the “natural hazards” hearing.	Disallow the submission point
S602.00241	Oppose	Coastal Hazards Variation Maps	It is not clear what amendments are proposed to maps and presumably this submission point relates to the submission points above. If this general submission introduces submission points not included in the summary then an opportunity should be provided for review and any further submission. It is noted that there will already be submissions from the original notification of the proposed plan, and to which Westpower has made further submissions. Those further submissions remain.	<ol style="list-style-type: none"> <li>1. Specify and allow time for further submissions on any outcomes sought which are not currently summarised.</li> <li>2. It is understood that the original further submissions of Westpower are to be carried through to this variation process. See original further submission points for decisions sought.</li> </ol>

#### Note to Further Submitter

This further submission on the Proposed District Plan must be received by **5pm on 31 January 2025**.

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- it is frivolous or vexatious:
- it discloses no reasonable or relevant case:
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
- it contains offensive language:
- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

**FURTHER SUBMISSION IN SUPPORT OF, OR IN OPPOSITION TO, A  
SUBMISSION ON VARIATION 2: COASTAL HAZARDS TO THE  
PROPOSED TE TAI O POUTINI PLAN (TTPP)**

**Clause 8 of Schedule 1 Resource Management Act 1991**

**To:** Te Tai o Poutini Plan Team  
**Address:** 388 Main South Road, Paroa, Greymouth 7805  
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**Postal address:** C/- West Coast Planning Ltd, 6 Dowling Road, Greymouth 7805  
**Email address for service:** MartinK@xtra.co.nz  
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**I am a person or organisation who lodged a submission on the Variation, following its initial public notification on 27 June 2024:** *(please tick relevant box)*

a) Yes

**X**

b) ~~No~~

**I am a person or organisation who lodged a submission on the Variation, following its initial public notification on 21 November 2024:** *(please tick relevant box)*

a) Yes

**X**

b) ~~No~~

*If neither of the above apply, please state the grounds as to why you believe you have the right to lodge a further submission on this matter:*

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**TTPP Hearing** *(please tick relevant box)*

Do you wish to be heard in support of your further submission?

**Yes**

If others make a similar submission would you consider presenting a joint case with them at a hearing? **Yes**

**Submission**

The submission points, support or opposition, reasons and decisions sought are set out in the attached document. **Note:** Any attachments to your submission should only be supporting information, not the submission.

A handwritten signature in blue ink, appearing to read 'M Kennedy', is positioned above a horizontal line.

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***Signature of the person making further submission or the person authorised to sign on behalf of the person making further submission.***

31 January 2025

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***Date***

**Name of Further Submitter:** Westpower Limited

My specific further submission(s) are as follows: *(Please only insert one further submission point per line. Add further sheets as required)*

I support/oppose the Submission of: Natural Hazards Commission Toka Tū Ake (S775)

<b>The particular part of the submission I support/oppose are:</b> <i>(State the Submission No./Point no. of the original submission you support or oppose, together with any relevant provisions of the proposal)</i>			<b>The reasons for my support / opposition are:</b> <i>(State the nature of your further submission, giving reasons)</i>	<b>I seek that the whole (or part) of the submission be allowed / disallowed:</b> <i>(Give precise details of the decision you want TTPP to make)</i>
<i>Sub No. / Point No.</i>	<i>Support / Oppose</i>	<i>Provision</i>		
S775.002	Oppose	Natural Hazards	Westpower made a range of further submissions in relation to the original submission points of the submitter. Those further submission points remain.	It is understood that the original further submissions of Westpower are to be carried through to this variation process. See original further submission points for decisions sought.
S775.001	Oppose	Natural Hazards Variation Maps	Westpower made a range of further submissions in relation to the original submission points of the submitter. Those further submission points remain.	It is understood that the original further submissions of Westpower are to be carried through to this variation process. See original further submission points for decisions sought.

**Note to Further Submitter**

This further submission on the Proposed District Plan must be received by **5pm on 30 June 2023**.

To get your further submission to us, either:

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Email to: [info@tppp.nz](mailto:info@tppp.nz)

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Attention: TTPP Team

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- it discloses no reasonable or relevant case:
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
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**FURTHER SUBMISSION IN SUPPORT OF, OR IN OPPOSITION TO, A  
SUBMISSION ON VARIATION 2: COASTAL HAZARDS TO THE  
PROPOSED TE TAI O POUTINI PLAN (TTPP)**

**Clause 8 of Schedule 1 Resource Management Act 1991**

**To:** Te Tai o Poutini Plan Team  
**Address:** 388 Main South Road, Paroa, Greymouth 7805  
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a) Yes

**X**

b) ~~No~~

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a) Yes

**X**

b) ~~No~~

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**TTPP Hearing** *(please tick relevant box)*

Do you wish to be heard in support of your further submission?

**Yes**

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**Submission**

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31 January 2025

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***Signature of the person making further submission or  
the person authorised to sign on behalf of the person  
making further submission.***

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***Date***

**Name of Further Submitter:** Westpower Limited

My specific further submission(s) are as follows: *(Please only insert one further submission point per line. Add further sheets as required)*

I support/oppose the Submission of: Scenic Hotel Group (S483)

<b>The particular part of the submission I support/oppose are:</b> <i>(State the Submission No./Point no. of the original submission you support or oppose, together with any relevant provisions of the proposal)</i>			<b>The reasons for my support / opposition are:</b> <i>(State the nature of your further submission, giving reasons)</i>	<b>I seek that the whole (or part) of the submission be allowed / disallowed:</b> <i>(Give precise details of the decision you want TTPP to make)</i>
<b>Sub No. / Point No.</b>	<b>Support / Oppose</b>	<b>Provision</b>		
S483.021	Oppose	NH06	Westpower made a submission in relation to this objective and was heard in that regard at the “natural hazards” hearing. There have been no decisions from that hearing. The current proposal is a variation in regard to certain coastal hazards. It is unclear whether those earlier matters are to be carried through to the variation hearing and heard again. The submission seeks to enable effects on infrastructure, which would include elements of regionally significant infrastructure. Westpower does not consider such an outcome is appropriate.	Disallow the submission.
S483.026	Oppose	NHP12	The submission raises issues related to risk and its management and further issues related to development in Punakaiki. It is also noted that issues in relation to the policy have been heard through the “natural hazards” hearing, although no decisions have been made. It is considered that risk and management have already been addressed through the process and the linkage of zoning intent to functional and operational need is not appropriate.	Disallow the submission.
S483.030	Oppose	NHR38	The submitter seeks to amend the rule to provide only for reconstruction of buildings for sensitive activities. This limits other building types and the issue provided for (footprint) is already included in proposed 2c.	Disallow the submission.

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**Clause 8 of Schedule 1 Resource Management Act 1991**

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a) Yes

**X**

b) ~~No~~

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a) Yes

**X**

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**TTPP Hearing** *(please tick relevant box)*

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**Submission**

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31 January 2025

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***Signature of the person making further submission or  
the person authorised to sign on behalf of the person  
making further submission.***

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***Date***

**Name of Further Submitter:** Westpower Limited

My specific further submission(s) are as follows: *(Please only insert one further submission point per line. Add further sheets as required)*

I support/oppose the Submission of: Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)

<b>The particular part of the submission I support/oppose are:</b> <i>(State the Submission No./Point no. of the original submission you support or oppose, together with any relevant provisions of the proposal)</i>			<b>The reasons for my support / opposition are:</b> <i>(State the nature of your further submission, giving reasons)</i>	<b>I seek that the whole (or part) of the submission be allowed / disallowed:</b> <i>(Give precise details of the decision you want TTPP to make)</i>
<b>Sub No. / Point No.</b>	<b>Support / Oppose</b>	<b>Provision</b>		
S620.428	Oppose	NHO4	The submission seeks to amend NHO4 which will in turn impact natural hazard provisions unrelated to the variation, ie outside the coastal area. These matters have already been heard as part of the “natural hazards” hearing. It is not considered appropriate to amend the objective as proposed.	Disallow the submission
S620.439	Oppose	NHP14	The submission is referenced as a policy but refers to a rule. It appears that the rule referenced may be that recommended by the s42A Officer at the “natural hazards” hearing, and is not a part of the variation process. It is noted that there have been no decisions made in regard to those matters and they currently form no part of any provisions of the pTTPP.	Disallow the submission
S620.440	Oppose	NHR15	It is understood that this submission references a rule recommended by the s42A Officer at the “natural hazards” hearing, and is not a part of the variation process. It is noted that there have been no decisions made in regard to those matters and they currently form no part of any provisions of the pTTPP. If it were to proceed the proposed amendment would change the interpretation of provisions in the chapter.	Disallow the submission
S620.441	Oppose	NHR16	It is understood that this submission references a rule recommended by the s42A Officer at the “natural hazards” hearing, and is not a part of the variation process. It is noted that there have been no decisions made in regard to those matters and they currently	Disallow the submission

			form no part of any provisions of the pTTPP. If it were to proceed the proposed amendment would change the interpretation of provisions in the chapter.	
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a) Yes

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making further submission.***

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***Date***

**Name of Further Submitter:** Westpower Limited

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I support/oppose the Submission of: Te Tai o Poutini Plan Committee (S171)

<b>The particular part of the submission I support/oppose are:</b> <i>(State the Submission No./Point no. of the original submission you support or oppose, together with any relevant provisions of the proposal)</i>			<b>The reasons for my support / opposition are:</b> <i>(State the nature of your further submission, giving reasons)</i>	<b>I seek that the whole (or part) of the submission be allowed / disallowed:</b> <i>(Give precise details of the decision you want TTPP to make)</i>
<b>Sub No. / Point No.</b>	<b>Support / Oppose</b>	<b>Provision</b>		
S171.027	Oppose	Natural Hazards	<p>Whilst it is agreed that changes that will assist plan users are useful there is no detail as to which provisions are proposed to be changed through this submission. It is understood that the provisions fall within the “natural hazards chapter” and not the “coastal environment chapter” so some care would be needed that there was no confusion as to which provisions apply and importantly do not apply. Amendments to terms and definitions were not a component of the variation developed by the Committee. There is no discussion of the impact of the proposal as would have occurred through normal development of the variation.</p>	Disallow the submission point
S171.026	Oppose	Overview	<p>The submitter seeks amendment to various terms used throughout the provisions based on the s42A Report to the “natural hazards” Hearing. Whilst it is agreed that consistency is appropriate it is noted that no decisions have been made on those matters. The submission does not set out which terms are proposed to be inserted into which provisions (including rules), and what the impact of such amendments would be. This essentially disables the ability to understand and assess the impact of the proposals, and indeed the ability to submit in the first instance. There is no discussion of the impact of the proposal as would have occurred through normal development of the variation.</p>	Disallow the submission point

S171.028	Oppose	Natural Hazard Objectives	Whilst promoting the variation it is noted that the committee did not propose new objectives through the variation to enable appropriate time for consideration of the impact of provisions and development of submissions in that regard. There is concern in regard to this process for the insertion of new provisions. The new objectives proposed are based on matters arising at the “natural hazards” hearing and from which no decisions have been made. It is also noted that the wording of proposed provisions at that hearing were not agreed and amendments are sought by Westpower. There is no discussion of the impact of the proposal as would have occurred through normal development of the variation.	Disallow the submission point
S171.029	Oppose	NH-P10	Whilst promoting the variation it is noted that the committee did not propose any new policies through the variation to enable appropriate time for consideration of the impact of provisions and development of submissions in that regard. There is concern in regard to this process for the insertion of new provisions. The new policy proposes different wording to that notified in the proposed plan and variation or indeed proposed through the “natural hazards” hearing and adds additional tests. There is no discussion of the impact of the proposal as would have occurred through normal development of the variation.	Disallow the submission point
S171.031	Oppose	Natural Hazard Rules	Whilst promoting the variation it is noted that the committee did not propose any new rules through the variation to enable appropriate time for consideration of the impact of provisions and development of submissions in that regard. There is concern in regard to this process for the insertion of new provisions. The new rule proposes different wording to that notified in the proposed plan and variation or indeed proposed through the “natural hazards” and “coastal environment” hearings, both of which have been completed. The proposal also is more encompassing than the variation, is not consistent with the approach	Disallow the submission point

			across numerous hearings to date, and adds additional tests. There is no discussion of the impact of the proposal as would have occurred through normal development of the variation.	
S171.032	Oppose	Permitted Activities	Whilst promoting the variation it is noted that the committee did not propose any new rules through the variation to enable appropriate time for consideration of the impact of provisions and development of submissions in that regard. There is concern in regard to this process for the insertion of new provisions. The new rule proposes different wording to that notified in the proposed plan and variation or indeed proposed through the “natural hazards” and “coastal environment” hearings, both of which have been completed. The proposal also is more encompassing than the variation and is not consistent with the approach across numerous hearings to date. The proposal would set a different rule framework within the 3 coastal overlays and potentially lead to a change in interpretation of other rules. There is no discussion of the impact of the proposal as would have occurred through normal development of the variation.	Disallow the submission point
S171.033	Oppose		Whilst promoting the variation it is noted that the committee did not propose any naming convention through the variation to enable appropriate time for consideration of the impact of provisions and development of submissions in that regard. There is concern in regard to this process for the insertion of such amendments. This is particularly when there is no specificity as to what is proposed and which provisions will be amended.	Disallow the submission point

**Note to Further Submitter**

This further submission on the Proposed District Plan must be received by **5pm on 31 January 2025**.

To get your further submission to us, either:

Complete it online at: [www.ttpn.nz](http://www.ttpn.nz)

Email to: [info@tppn.nz](mailto:info@tppn.nz)

Post to: PO Box 66, Greymouth, 7840

Attention: TTPP Team  
Deliver to: 388 Main South Road, Paroa, Greymouth 7805

A copy of your further submission MUST be served on the original submitter within 5 working days after it is served on the local authority. Contact details for all submitters can be found on our Submissions page at [www.ttpp.nz](http://www.ttpp.nz).

Please note all information provided in your submission, including your personal information, will be made publicly available.

Your submission (or part of it) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of it):

- it is frivolous or vexatious:
- it discloses no reasonable or relevant case:
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
- it contains offensive language:
- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.