

**IN THE ENVIRONMENT COURT OF NEW ZEALAND  
CHRISTCHURCH REGISTRY**

**I TE KŌTI TAIAO O AOTEAROA  
ŌTAUTAHI ROHE**

**UNDER** the Resource Management Act 1991 (RMA)  
**IN THE MATTER** of an application for orders under section 279(4) of the  
RMA  
**BETWEEN** **TE TAI O POUTINI PLAN COMMITTEE**  
**Applicant**  
**AND** **JOHN CURRIE**  
ENV-2025-CHC-000100  
**Respondent (Appellant)**

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**AFFIDAVIT OF LOIS MARGARET EASTON IN SUPPORT OF NOTICE OF  
MOTION SEEKING ORDERS STRIKING OUT APPEAL  
1 April 2026**

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Respondent's Solicitor  
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Solicitor: A H Balme / T M Ellis  
(alice.balme@wynnwilliams.co.nz /  
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**WYNN WILLIAMS**

*L.G.*

I, Lois Margaret Easton, of Gisborne, Principal Consultant, swear:

- 1 My full name is Lois Margaret Easton. I am a Principal Consultant for Kereru Consultants, an environmental science and planning consultancy engaged by the West Coast Regional Council to support the development of Te Tai o Poutini Plan (TTPP).
- 2 I make this affidavit in support of the TTPP Committee's Notice of Motion (**Application**) to strike out the Notice of Appeal filed by John Currie on 21 November 2025 (**Notice of Appeal**) on the TTPP Committee's decision on the TTPP.
- 3 I hold a Master of Science (Environmental Science and Botany) with first class honours from Auckland University, obtained in 1995.
- 4 I have 25 years' experience in planning and resource management including 10 years at the Waitakere City Council and five years at the Gisborne District Council. The remaining time I have worked as an environmental and planning consultant primarily providing policy advice to local government and not for profit organisations.
- 5 My experience involves policy development, writing district plans and regional plans. I have written section 32 and 42A reports and appeared at hearings for the development of several plans involving matters principally around the natural environment, Māori issues and rezoning of land. I have represented the Waitakere District Council and Gisborne District Council in mediation on appeals and have presented planning evidence.
- 6 In recent years I have been involved in the development of the TTPP and I am now assisting the TTPP Committee in relation to the appeals filed with the Environment Court against the TTPP Committee's decision on TTPP.
- 7 I am familiar with the content of the Notice of Appeal that is subject to the TTPP Committee's Application.

**Scope of affidavit**

- 8 In this affidavit I:
  - (a) provide background on the TTPP process;
  - (b) explain Mr Currie's attempted submission on the TTPP;

- (c) set out the TTPP Committee's responses to Mr Currie's attempted submission; and
- (d) provide background on Mr Currie's appeal.

#### **Background on the TTPP process**

- 9 The TTPP was notified on 14 July 2022. The period for lodging submissions ended on 11 November 2022 (after being extended by the TTPP Committee from 30 September 2022).
- 10 534 submissions were lodged on the TTPP, amounting to over 15,000 individual submission points.
- 11 The summary of submissions was published in April 2023, with further submissions closing in June 2023. 230 further submissions were received.
- 12 An Independent Hearings Panel (IHP) was delegated the power to hear submissions and make recommendations to the TTPP Committee. Hearings on the TTPP began in October 2023 and continued through to March 2025 on a topic-by-topic basis.
- 13 Two variations to the TTPP were also notified throughout this process. Variation 1 addressed activities on the surface of waterbodies, and was limited notified. Five submissions were received on Variation 1, all in support of the Variation.
- 14 Variation 2 addressed coastal hazards, including updated mapping for some of the hazard overlays. A large number of submissions and further submissions were received on this variation, and a hearing was held on 17 – 20 March 2025.
- 15 The IHP provided its recommendation reports to the TTPP Committee from mid-2025.
- 16 Following receiving the recommendation of the IHP, the TTPP Committee publicly notified its decisions on submissions on the TTPP under clause 10 of Schedule 1 of the RMA on 10 October 2025.

#### **Mr Currie's attempted submission on TTPP**

- 17 Mr Currie attempted to lodge a submission on the TTPP concerning Industrial Zones in the Buller District on 20 November 2024. A copy of that attempted submission is attached to my affidavit as **Exhibit A**.



- 18 Mr Currie's attempted submission related to parts of the plan included in the Commercial and Industrial Zones Topic. Hearings on that topic were held on 1 and 2 July 2024. Given this timing, Mr Currie's submission was not included in the s 42A report circulated prior to the hearing or considered during the hearing.
- 19 When the IHP released its recommendation report on the Commercial and Industrial Zones Topic in September 2025, this did not include consideration of the submission made by Mr Currie.

#### **TTPP Committee's response to attempted submission**


- 20 A response to Mr Currie's attempted submission was sent to Mr Currie on behalf of the TTPP Committee on 17 December 2024. A copy of this email is attached to my affidavit as **Exhibit B**.
- 21 This email explained to Mr Currie that it was not possible for his submission to be accepted at the time as the public submissions process was effectively complete. The email noted that Variation 2 was the only aspect of the TTPP for which submissions were still open. This email also noted the potential ability for Mr Currie to have his concerns heard by becoming a section 274 party to another appeal on these matters at the appeals stage of the TTPP process.
- 22 While Variation 2 was still open for submissions, Mr Currie's submission was outside the scope of the Variation (which related to coastal hazards). This was addressed in paragraph 14 of the Report titled 'Summary of Submissions Received on Variation 2: Coastal Hazards' dated 16 January 2025 (**Report**). A copy of the body of the Report is attached to my affidavit as **Exhibit C** (noting this excludes Appendices 1-3 of the Report). Paragraph 14 sets out that the submission (of Mr Currie) was outside of scope of Variation 2 in its entirety. As such, the submission was excluded from the Variation 2 process.
- 23 On 16 January 2025, the TTPP Committee moved the information in the Report be received and that the Summary of Submissions be accepted and publicly notified. A copy of the minutes of the meeting of the TTPP Committee dated 16 January 2025 are attached to my affidavit as **Exhibit D**.

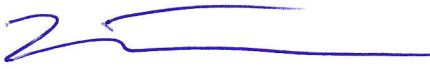
L.G.

**Mr Currie's appeal**

- 24 Mr Currie lodged an appeal against the TTPP Committee's decision on the TTPP on 21 November 2025. Mr Currie is appealing against the Industrial Zones in the Westport area and seeks relief in respect of specified sites. A copy of the Notice of Appeal is attached to my affidavit as **Exhibit E**. In that Notice of Appeal, Mr Currie states that he made a submission on the TTPP.
- 25 The Court issued a letter of acknowledgement of Mr Currie's appeal on 24 November 2025. A copy of the acknowledgment letter is attached to my affidavit as **Exhibit F**.
- 26 On 5 December 2025, Wynn Williams wrote to Mr Currie on behalf of the TTPP Committee to request that Mr Currie withdraw his appeal due to a lack of standing as he did not make a valid submission on the TTPP. A copy of that letter is attached to my affidavit as **Exhibit G**. This letter again noted to Mr Currie that it may be possible for him to become a section 274 party to someone else's appeal of the TTPP. Mr Currie did not take this opportunity and is not a section 274 party to any other appeals on the TTPP.
- 27 Mr Currie responded by way of letter on 19 December 2025 stating that he would not withdraw his appeal. A copy of this letter is attached to my affidavit as **Exhibit H**.

Sworn at Gisborne this 1<sup>st</sup> day of April )  
 2026, before me: )  
 )

  
 .....  
 Lois Margaret Easton

  
 .....


A Solicitor/Deputy Registrar of the High Court of New Zealand  
 Justice of the Peace

**Julie Mettrick**  
**Solicitor**  
**Gisborne**

"A"

**Submission on Industrial Zones in the Buller District.**

John Currie  
57 Stafford Street  
Westport.  
20/11/2024

**EXHIBIT NOTE**  
This is the annexure marked "A" referred to in the annexed affidavit of Lois Margaret Easton sworn at Gisborne on this 15<sup>th</sup> day of April 2026 before me:  
  
.....  
**A Solicitor / Deputy Registrar of the High Court of New Zealand**

My submission is late because since the TTPP has been under review I have been overseas and have only just returned to Westport on a more regular basis.

**Julie Mettrick**  
**Solicitor**  
**Gisborne**

Firstly I will give a brief history and an account of my experience in living in a residential area in a industrial zone.

As a family we arrived to our residence at 57 Stafford Street in about 1959. My parents wished to enjoy the quiet rural life style and bring up the family (which ended up a large family), in the rural environment.

In the nineteen eighties the Council declared the Robertson, Stafford Streets and McKenna Road area industrial, this was without any consultation with any of the residents in the area. In the nineteen nineties as the Resource Management Act (RMA) came into existence the council sent notification to request comments on the area being industrial. This was before any of the Heavy to General industries were on their current sites.

In my submission I pointed out to the Council that the land was high productive agriculture land and to get to this site, transport for any industry would have to travel through the residential zone. The councils reply was that they elected to retain the land as industrial.

The land in the Robertson Street area became the site of an engineering industry which has expanded over time. Then the Stafford Street area became the site of a trucking firm and concrete manufacturing plant and lately some engineering firms have established in the building.

Originally the Stafford Street site was to have a ball-mill crushing plant established on it, but the towns residents protested to have this stopped, the horrendous noise from a plant like this would have been heard all over the town.

The noise from all these industries has increased overtime and still increasing. There is limited hours during the day that the industries can work on these sites but these have never been observed. There is light pollution at night, continual noise on a daily basis, this included Saturdays and Sundays, although Sunday at times doesn't appear as bad as the other days.

The noise involves the Engineering industry on Robertson Street, the likes of machines working in the yard, machinery noise from the workshop, which is even louder when the workshop doors are open. This noise can be heard in my kitchen even though the wall cavities are insulated and the windows are double glazed.

For the concrete manufacturing sites we have crushing plant noise and dust and many vehicle movements to and from the site, trucking gravel to be crushed for concrete material. Visits by the cement provider, metal recycling truck etc.

The trucking yard has multiple noises. There are also other engineering firms housed within the building which create their own noise, freight agents frequently visit the site and there is a twenty four hour fuel stop on the yard. All vehicle movements for these sites have to transverse through the

residential areas of the town.

Some recent events are: Monday 18<sup>th</sup> November the yard on the Stafford Street site was graded with the bucket of a loader. The resulting extremely loud screeching sound continued from about 0900 to 1200 and again for about an hour in the afternoon.

Tuesday the 19<sup>th</sup> November the Engineering workshop in Robertson Street had machinery running till after 2230 at night. The noise is that which I can hear in my kitchen.

The best part is the twenty four hours coal trucking to Ikamatua. With this the noise is basically all over the twenty four hours of the day with the odd short lull in the early hours of the morning, when I have gained a short amount of sleep. I have kept detailed records of vehicle movements and noise since the 12<sup>th</sup> of October and these records show that I get very little sleep.

The twenty four hours trucking came about because of the rail tunnel collapse at Reefton. The Buller District Council (BDC) gave the trucking firm permission to operate twenty four hours and as the trucks are unable to carry a full load because of bridge weight restrictions between Ngakawau and Westport. Coal is dumped at the Stafford Street site and trucks travelling to Stillwater top up their loads at the trucking yard.

As you can see there is no time that I can enjoy the natural characters of the rural environment in my retirement because of the devastating affects by the inappropriate placement of the surrounding industries which have destroyed the amenity values and quality of the environment of this area.

#### **Submission on Industrial Zones in the Buller District.**

John Currie

20/11/2024

#### ***Quote***

Report Nine Industrial Zones

#### Functional and Operational Constraints of Industrial Activities:

The functional and operational constraints, and potential for adverse environmental effects, mean that careful consideration needs to be given to determining optimal locations for industrial zoning.

#### Key issues:

A highly productive industry sector is critical to the effective functioning of the West Coast. As industry is a large economic contributor to the community, it is vital to maintain the integrity of the sector. The resource management issues for industry on the West Coast are:

#### Providing adequate land for industrial uses:

Together, land supply and the location of the land are critical in ensuring the industrial sector is supported. Land needs to be feasible, serviced, developable and connected to transport networks in order to meet the growing population's demands.

#### Managing the adverse effects of industry:

The operational and functional needs of the industry means that industry has the potential to generate significant adverse effects on the environment. The RMA directs the committee to prioritise the preservation of the natural character of the environment, and maintenance and enhancement of the amenity values and the quality of the environment. TTPP must provide for

industrial activities and their contribution to social and economic well being, while making sure appropriate safeguards are in place to protect the environment from their adverse effects.

*Unquote*

The Industrial Zone encompassing Robertson, Stafford Streets and McKenna Road.  
This land is high value productive agricultural land.

It is not only an inappropriate area for an industrial zone because of the high value agricultural land, but it also borders residential and rural residential areas and is located in an area that doesn't have good heavy vehicle access and good visibility from an arterial road.

The proposal is to rezone the Robertson, Stafford Streets and McKenna Road industrial area to General Industrial. This will mean the high quality agricultural land that this area is sited on will be lost. Most of the land in this zoned industrial area is still used for agriculture.

My understanding is that there are other areas around Westport that were recently denied planning permission to subdivide for housing because of the importance of the land for agriculture. Yet the Robertson, Stafford Streets, McKenna Road area is still available for industrial use.

To get to the Stafford Street Industrial site (which is a trucking site, concreting manufacturing site, (which includes a gravel crushing plant), engineering site and a 24 hour fuel stop), upon entering Westport from the West via the Buller Bridge heavy vehicles need to traverse 2.4km of road through the residential area of Westport township via Palmerston, Mill, Queen and Stafford Streets.

There is another slightly shorter route via Menzies, Roebuck, Queen and Stafford Streets, but this also traverses the residential area.

Its is also not appropriate for additional reasons in that the turnoff to Menzies Street is a right hand turn at the base of the ramp from the Buller Bridge on a curving down hill run which would become a dangerous bottle neck for traffic arriving from the Buller Bridge as there is no inside passing bay. The camber on the road doesn't promote a right hand turn especially for fully laden large truck and trailer units as it is to the left, any opposing traffic would mean that the fully laden truck unit would have to wait to turn right to enter Menzies Street. To use this route would cause a build up of traffic from the Buller Bridge and with a truck and trailer unit waiting to move off from a stationary position there is increased possibility of a road accident.

To also get to this site from the northern area, heavy vehicles travel via Stephens road, McKenna Road and Stafford Street. The section of Stephens road from the Bridge to McKenna Road is not built for heavy truck movements. It is very narrow and has a poor foundation and road surface, as has been demonstrated by the 24 hour trucking of coal over this road from 24 June 2024.

With 24 hour trucking of the coal the truck and trailer units then leave the Stafford Street site and travels to the state highway via the Buller Bridge through the residential zone.

The Robertson Street site also has to be accessed through the residential area via Palmerston, Mill, Derby and Robertson Streets. A distance from the Buller Bridge of 1.85 km.

Sergeants Hill Industrial area is in the centre of a rural residential area. The question is whether or not this is now a suitable industrial site.

The Buller District is full of indiscriminate subdivisions with very few places now available to have Industrial sites, especially Heavy Industry. By proposing to rezone the old Cement works site to light Industrial we are destroying the prospects and ability of future generations to put their mark on the District.

Two of the key issues is to provide adequate land for industrial uses and managing the adverse effects of the industry. These issues would not be sorted if the cement works site was rezoned to light industrial. The integrity of the sector would not be maintained.

We need to have Heavy Industry sites on the coast, we can not direct the districts future when this is not ours to make. We do not know what the future holds and we should not be restricting decision makers of the future from determining the development of the Buller District.

Cape Foulwind, the old cement works site is already designated Heavy Industry and there is a proposal to rezone it to light industry and rural residential.

As has been shown by the past siting of the cement works on this site it is an ideal Heavy Industry site and probably the only suitable Heavy Industry site in the Buller District.

As we don't know what the future holds we should be creating a District Plan that allows our future leaders and citizens to make their own decisions on where the district should progress too. Therefore this site should be kept Heavy Industry with allowance for General Industry to be also included.

The area was recently considered for a Waste to Energy Plant, we will not be able to or our future decision makers be able to plan any Heavy Industry projects like this in the future if we rezone to Light Industrial and Rural Residential. This would definitely be a big detriment to our community.

In the words of Doris Day "the future is not ours to see", so we should not be determining it for our future citizens by destroying their the last bastions of hope for any Heavy Industry of the future.

The Robertson, Stafford Street and McKenna Road Industrial Zone should be rezoned rural in keeping with the surrounding rural areas and to preserve the high value agricultural land and prevent the noise and other pollutants that is now created from these sites.

Over a determined time the industries at the eastern end of Robertson Street and those in Stafford Street should be moved to a more suitable industrial area.

The industry at the end of Robertson Street would be ideally situated on the old cement works site at Cape Foulwind, along with the concrete manufacturing industry.

The Trucking Industry would be better suited at a site before the Buller Bridge to reduce the numbers of large truck and trailer units entering the towns residential area.

The Robertson, Stafford Street, McKenna road area industries have many issues, like vehicle access via residential areas, poor visibility from an arterial road, noise and other pollutants to the surrounding rural and residential areas. Which mean that they don't comply with the current Buller District Plan, let alone the proposed TTPP.

Thank you for considering my submission and I hope the information is helpful in the preparation of a workable TTPP for all citizens of the Buller and Westcoast into the future.

John Currie

*J. Currie*

5 pages

"B"

**Tracey Ellis**

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**From:** TTPP Info <info@tttp.nz>  
**Sent:** Tuesday, 17 December 2024 12:12 PM  
**To:** curriejohn789@gmail.com  
**Cc:** TTPP Info  
**Subject:** Fw: Proposed TTPP - Industrial Zones Buller District: THIS SUBMISSION CANNOT BE ACCEPTED AT THIS TIME  
**Attachments:** Submission on Industrial Zones Buller District.pdf

Thank you for your recent email, attaching a submission on the Industrial Zones within the Buller District under the Proposed Te Tai o Poutini Plan (TTPP).

Unfortunately it is not possible for this submission to be accepted at this time. The Plan was notified for submissions in mid 2022, a Summary of Submissions Received was then compiled in April 2023, with further submissions on that closing in May 2023. That effectively completed the public submissions process.

Subsequent to that, there have been two Variations:

- Variation 1: Activities on the Surface of Water. This simply made several amendments to that particular section of the Plan to confirm that Port activities in Westport Harbour and at the Port of Greymouth are Permitted Activities under the Plan. This was undertaken on a limited notified basis (i.e. notified to affected persons only); and
- Variation 2: Coastal Hazards - a publicly notified Variation, essentially updating three of the Plan's Coastal Hazard Overlays, for which submissions close on Thursday 19 December 2024 at 5.00pm. Details are available on the TTPP Website at <https://tttp.nz/variation-2-coastal-hazards-2/>.

Variation 2 is the only aspect of Plan formulation for which submissions are presently being accepted. In fact submissions on the overall Plan itself have not only progressed through the Further Submission stage, the Independent Commissioners have already concluded their Hearings on all the Plan topics. The only exception to this is that while Variation 2 is primarily about changes in Overlay mapping, persons can comment on those provisions of relevance in the Natural Hazards Chapter as part of their submission. The submissions on Variation 2 are due to be heard in the final week of March 2025.

Obviously, it would make it extraordinarily difficult to accept late submissions on the overall Plan at this stage, given the stage in the process that has now been reached. And if an exception is made for you, then realistically it would be impossible not to make similar exceptions for numerous others who now decide they wish to submit if not having done so or add to submissions already lodged.

The Commissioners are expected to begin releasing their decisions on the various Plan topics from April 2025. Such decisions can then be appealed to the Environment Court. It is then potentially possible under Section 274 of the Resource Management Act 1991 (RMA) for persons to "become a party to" proceedings dealing with resolution of the Appeal concerned, if the person or organisation concerned believes they/it have an interest in such proceedings that is "greater than that of the general public". While information must be relevant to the Appeal in question, it at least provides a potential avenue for later involvement in proceedings, when and where the initial submission round has been missed. Details of how one can so participate will be made available when notification of the Appeals received is given.

**Julie Mettrick**  
**Solicitor**  
**Gisborne**

**EXHIBIT NOTE**

This is the annexure marked "B" referred to in the annexed affidavit of Lois Margaret Easton sworn at Gisborne on this 15<sup>th</sup> day of April 2026 before me:

  
.....  
A Solicitor / Deputy Registrar of the High Court of New Zealand

I am sorry that the response cannot be more favourable, but it hopefully explains why the approach taken in this instance has been necessary.

Cheers  
Doug Bray  
Senior Policy Planner (TTPP)

**TTPP Info**  
**West Coast Regional Council**

 info@tpp.nz



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**From:** John Currie  
**Sent:** Thursday, November 21, 2024 10:41 AM  
**To:** TTPP Info  
**Subject:** Proposed TTPP - Industrial Zones Buller District

Caution! This message was sent from outside your organization.

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Dear Planners

I have attached my submission regarding the industrial zones in the Buller District. The reason for the lateness is stated in the submission. Also the statements in the report regarding Robertson, Stafford Streets and McKenna Road as a suitable industrial site, I believe to be incorrect.

Thank you for your time and consideration in this matter.

John Currie

"C"



# Te Tai o Poutini PLAN

*A combined district plan for the West Coast*

Prepared for: Te Tai o Poutini Plan Committee

Prepared by: Doug Bray, Senior Policy Planner

Date: 16 January 2025

Subject: **Summary of Submissions Received on Variation 2: Coastal Hazards to the Proposed Te Tai o Poutini Plan**

## SUMMARY

This report brings the summary of submissions on Variation 2 – Coastal Hazards to the Committee for acceptance and seeks approval to notify the further submissions period beginning 17 January 2025.

## RECOMMENDATIONS

1. That the information be received.
2. That in accordance with Clause 7(1) of Schedule 1 of the RMA, the Summary of Submissions contained within Appendix 1 be accepted and publicly notified for the receipt of further submissions.
3. That in accordance with Clause 7(2) of Schedule 1 of the RMA, copies of both public notice and the Summary be served on those who lodged submissions.
4. That the required two-week period for receipt of further submissions open on 17 January 2025, with a closing time of 5pm on Friday 31 January 2025.

### EXHIBIT NOTE

This is the annexure marked "C" referred to in the annexed affidavit of Lois Margaret Easton sworn at Gisborne on this 15<sup>th</sup> day of April 2026 before me:

.....  
A Solicitor / Deputy Registrar of the High Court of New Zealand

**Julie Mettrick**  
Solicitor  
Gisborne

## BACKGROUND

1. Variation 2: Coastal Hazards to the Proposed Te Tai o Poutini Plan (TTPP) has been undertaken to better inform application of the following three Coastal Natural Hazard Overlays:

- Coastal Hazard – Severe
- Coastal Hazard – Alert
- Coastal Hazard – Setback

This has been through the incorporation of superior LiDAR (light detection and ranging) data, in preference to these Overlays being informed by less reliable space shuttle data. Such information is not yet available for those areas north of Hector and south of Jackson Bay, while the work in the Greymouth area from the Taramakau River to Cobden has only recently been completed. Those three areas were not, therefore, affected by the Variation. The Variation also had no impact on the immediate areas of Westport and Hokitika, as the Overlays in those areas were already informed by LiDAR data at the time of the Plan's public notification for submissions in mid-2022.

2. The Variation did not affect the Coastal Tsunami Overlay or any other of the Plan's Natural Hazard Overlays and made no specific changes to the provisions of the Plan's Natural Hazards Chapter. However, as the Coastal Hazard overlays affect how natural hazard provisions (particularly objectives, policies and rules) apply to particular properties, submissions have now been sought on these provisions as they relate to Coastal Hazards.
3. Originally Variation 2 was titled Coastal Natural Hazard *Mapping*, and was publicly notified on 27 June 2024. Submissions were invited on the changes to mapping of the Coastal Natural Hazard Overlays only. Submissions closed on 30 August 2024, with a further submissions period closing on 25 October 2024. 112 Submissions and 10 further submissions were received on Variation 2 as originally notified.
4. At its 12 November 2024 meeting, TTPP Committee approved renotification of Variation 2 to expand the scope of submissions to include the objectives, policies and rules ("the provisions") for coastal hazards, along with the changes to coastal hazard mapping. This followed concerns expressed by Submitters that restricting the coverage of submissions to mapping only was unduly restrictive, as it did not enable Submitters to include comment on provisions which may have altered in their application to a given property due to changes of the mapping overlays themselves. The TTPP Committee had considered such concerns and agreed that restricting submission coverage in this way could be deemed contrary to the Principles of Natural Justice (as set out in and required by the New Zealand Bill of Rights Act 1990).
5. Variation 2 was therefore publicly re-notified on 21 November 2024 in accordance with Clause 5 of Schedule 1 of the Resource Management Act 1991 (RMA). A public notice was placed in the Westport News, Greymouth Star, The Messenger and Hokitika Guardian, calling for submissions. In addition, notice of the Variation was served on over 2,000 coastal properties across the West Coast Region, plus the following organisations:
  - Ministry for the Environment
  - Department of Conservation
  - Te Rūnanga o Ngāti Waewae
  - Te Rūnanga o Makaawhio
  - West Coast Regional Council
  - Buller District Council
  - Grey District Council
  - Westland District Council

Copies of the Variation documents were placed in the Buller, Grey and Westland District Council Offices, the Westport, Greymouth and Hokitika Public Libraries and the West Coast Regional Council

(WCRC) Offices. This included maps showing whether or not areas were affected, and the extent to which Variation 2 had affected the Overlays concerned.

6. The mailout (c.f. public notification in the newspapers) was the principal means by which awareness of the Variation was generated. This included an updated Information Sheet, which made reference to the TTPP Website and included a copy of the public notice. Discussion of the Variation is still on the Website at <https://tppp.nz/coastal-hazards-variation/>, with the information provided there being very similar to that conveyed in the Information Sheet. The Website page includes a link to a Map Viewer, which enables properties to be zoomed in on in order to see precisely how the overlays affect a given property, and to what extent the Variation has altered such overlays relative to a given property.
7. Two concerns raised about the initial notification were that some unaffected property owners received letters and that the Map Viewer had not been entirely functional. Consequently, those numbers to whom notification was served was reduced from over 4,000 to just over 2,000. Property owners were informed via one of five generic letters based on level and extent of change to their property resulting from the Variation. The Map Viewer was upgraded to show the impacts of the proposed changes to the three Overlays on individual properties, both prior to and as a result of the Variation.
8. The closing date and time for submissions was Thursday 19 December 2024 at 5.00pm. When advising of the renotification, those who had already submitted were informed that they could either leave their existing submission as it was, add to their existing submission or replace it with a new submission. Ultimately 55 submissions were received, from both new submitters and previous submitters who wished to add to and/or clarify their existing submission.

## SUMMARY OF SUBMISSIONS

9. 112 submissions were received following initial notification, and all within the timeframe agreed. These were from the following:
  - Mary Stewart (Submitter 222) – [mary.ada.stewart@gmail.com](mailto:mary.ada.stewart@gmail.com)
  - David and Janice McMillan (Submitter 670) – [gidday2U@xtra.co.nz](mailto:gidday2U@xtra.co.nz)
  - Dee Deaker (Submitter 691) – [deakerdeanaccounts@mail.com](mailto:deakerdeanaccounts@mail.com)
  - Mark Vanstone (Submitter 708) – [sundogsurf@gmail.com](mailto:sundogsurf@gmail.com)
  - Kenneth Wiltshire (Submitter 749) – [ken.wiltshire@yahoo.co.nz](mailto:ken.wiltshire@yahoo.co.nz)
  - Jane Whyte and Jeff Page (Submitter 467) – [jane@responseplanning.co.nz](mailto:jane@responseplanning.co.nz)
  - Mandy Deans (Submitter 549) – [mandydeans@yahoo.com](mailto:mandydeans@yahoo.com)
  - Paparoa Track Services Ltd, Craig and Sue Findlay, Tim Findlay, Punakaiki Beach Camp (Submitter 605) – [lorja.hunt@tpri.co.nz](mailto:lorja.hunt@tpri.co.nz)
  - Dave Henderson (Submitter 742) – 12 Russell Street Westport 7825
  - David Hughes (Submitter 743) – 322 Palmerston Street Westport 7825
  - Les and Kathy McManaway (Submitter 751) – [lesmcmaway@outlook.com](mailto:lesmcmaway@outlook.com)
  - Lynda Reynolds (Submitter 752) – 294 Utopia Road Westport
  - Marilyn McKinney (Submitter 753) – 171B Peel Street Westport 7825
  - Maxmillion Donnelly (Submitter 754) – [beachcoast9@gmail.com](mailto:beachcoast9@gmail.com)
  - Patricia Paxton (Submitter 755) – [p.a.paxton@gmail.com](mailto:p.a.paxton@gmail.com)
  - Piet and Alison Geldenhuys (Submitter 757) – [pietg@xtra.co.nz](mailto:pietg@xtra.co.nz)
  - Ray Karl (Submitter 759) – [raykarl@xtra.co.nz](mailto:raykarl@xtra.co.nz)
  - Ronald Williams (Submitter 760) – 105 Domett Street Westport 7825
  - Wendy Sheenan (Submitter 761) – [wendyandleesa@hotmail.com](mailto:wendyandleesa@hotmail.com)
  - Desna Bruce-Walker (Submitter 692) – [desnabruce@gmail.com](mailto:desnabruce@gmail.com)
  - Michael Rogers (Submitter 709) – [rockiesmining@hotmail.co.nz](mailto:rockiesmining@hotmail.co.nz)
  - Mitchell Rogers (Submitter 710) – [mitchellrrogers@hotmail.com](mailto:mitchellrrogers@hotmail.com)
  - Forest Habitats Ltd (Submitter 186) – [barry@macdonellconsulting.co.nz](mailto:barry@macdonellconsulting.co.nz)
  - Michael Snowden (Submitter 492) – [rosie.hill@toddandwalker.com](mailto:rosie.hill@toddandwalker.com) and [ben.russell@toddandwalker.com](mailto:ben.russell@toddandwalker.com)

- Barbara Clark (Submitter 673) – [lucapema90@gmail.com](mailto:lucapema90@gmail.com)
- Biggles Ltd (Submitter 685) – [brett@townplanning.co.nz](mailto:brett@townplanning.co.nz)
- Neils Beach Special Rating District Committee (Submitter 669) – [john.allisonsutton@xtra.co.nz](mailto:john.allisonsutton@xtra.co.nz)
- Allison Sutton (Submitter 672) – [suttonoffice@xtra.co.nz](mailto:suttonoffice@xtra.co.nz)
- Finn Lindqvist (Submitter 694) – [suelind.nz@gmail.com](mailto:suelind.nz@gmail.com)
- MTP Ltd (Submitter 711) – [brett@townplanning.co.nz](mailto:brett@townplanning.co.nz)
- Murray and Rachel Petrie (Submitter 712) – [murray@mcarthurridge.co.nz](mailto:murray@mcarthurridge.co.nz)
- Rod Thornton (Submitter 724) – [rodthornton663@gmail.com](mailto:rodthornton663@gmail.com)
- Westpower Ltd (Submitter 547) – [MartinK@xtra.co.nz](mailto:MartinK@xtra.co.nz)
- Charlotte May (Submitter 762) – [maylord@xtra.co.nz](mailto:maylord@xtra.co.nz)
- John Sutton (Submitter 704) – [john.allisonsutton@xtra.co.nz](mailto:john.allisonsutton@xtra.co.nz)
- P & A Horrell (Submitter 715) – [brett@townplanning.co.nz](mailto:brett@townplanning.co.nz)
- Vance and Carol Boyd (Submitter 447) – [rvcnb@xtra.co.nz](mailto:rvcnb@xtra.co.nz)
- Karen Lippiatt (Submitter 439) – [kairlippiatt@gmail.com](mailto:kairlippiatt@gmail.com)
- Chris Reynolds (Submitter 362) – [c.w.reynolds@xtra.co.nz](mailto:c.w.reynolds@xtra.co.nz)
- Laurence Rueter (Submitter 381) – [jlymaneric@gmail.com](mailto:jlymaneric@gmail.com)
- Richard Arlidge (Submitter 419) – [whitecube1@gmail.com](mailto:whitecube1@gmail.com)
- Lyn McIntosh (Submitter 469) – [lynmcintosh@xtra.co.nz](mailto:lynmcintosh@xtra.co.nz)
- Frank O'Toole (Submitter 595) – [anna@blg.nz](mailto:anna@blg.nz)
- Grey District Council (Submitter 608) – [michael.mcenaney@greydc.govt.nz](mailto:michael.mcenaney@greydc.govt.nz)
- Gary Clarke (Submitter 667) – [westport@connorslegal.co.nz](mailto:westport@connorslegal.co.nz) or [admin@connorslegal.co.nz](mailto:admin@connorslegal.co.nz)
- Anna Leary (Submitter 668) – [anna@annaleary.com](mailto:anna@annaleary.com)
- Brette & Irene-Sharel Kokshoorn (Submitter 671) – [sharel.kockshoorn@jamesprint.co.nz](mailto:sharel.kockshoorn@jamesprint.co.nz)
- Helen & Tom Sawyers (Submitter 674) – [h.tsawyers@xtra.co.nz](mailto:h.tsawyers@xtra.co.nz)
- Joshua Tranter (Submitter 675) – [joshmarkt@gmail.com](mailto:joshmarkt@gmail.com)
- Mike MacMillan (Submitter 677) – PO Box 141 Karamea 7864
- Adriana James (Submitter 678) – [adriana.james59@gmail.com](mailto:adriana.james59@gmail.com)
- Adrienne Fraser (Submitter 679) – [elizafraser275@gmail.com](mailto:elizafraser275@gmail.com)
- Alexa Kliebenstein (Submitter 680) – [alexa.a.kliebenstein@gmail.com](mailto:alexa.a.kliebenstein@gmail.com)
- Andrew Dempster (Submitter 681) – [sherwoodrabbitt42@gmail.com](mailto:sherwoodrabbitt42@gmail.com)
- Andrew Lisseman (Submitter 682) – [andyllisseman@gmail.com](mailto:andyllisseman@gmail.com)
- Andrew Wiffen (Submitter 683) – [wiffendairying@gmail.com](mailto:wiffendairying@gmail.com)
- Ash Oldham (Submitter 684) – [1928chord@gmail.com](mailto:1928chord@gmail.com)
- Brian McFarlane (Submitter 686) – [bdmcfarlane@xtra.co.nz](mailto:bdmcfarlane@xtra.co.nz)
- Christine Carter (Submitter 687) – [08002bwell@gmail.com](mailto:08002bwell@gmail.com)
- Colman Creagh (Submitter 688) – 2 Anderson Street Rapahoe 7803
- Craig Hipson (Submitter 689) – [craig.hipson@icloud.com](mailto:craig.hipson@icloud.com)
- David Gourlay (Submitter 690) – [davegourlay@yahoo.com.au](mailto:davegourlay@yahoo.com.au)
- Elizabeth Duncan (Submitter 693) – [ejaneaustin@hotmail.com](mailto:ejaneaustin@hotmail.com)
- Daniel Reynolds (Submitter 695) – [danreynoldsconsulting@gmail.com](mailto:danreynoldsconsulting@gmail.com)
- George Field (Submitter 696) – [georgefield86@gmail.com](mailto:georgefield86@gmail.com)
- Glen Kingan (Submitter 679) – [office@karameahelicharter.co.nz](mailto:office@karameahelicharter.co.nz)
- Jason Jacobs (Submitter 698) – [sharkias@yahoo.co.nz](mailto:sharkias@yahoo.co.nz)
- Jim and Anne Murray (Submitter 699) – [glenmorestation@xtra.co.nz](mailto:glenmorestation@xtra.co.nz)
- Jocelyn Billet (Submitter 700) – [joel.luzanne@outlook.com](mailto:joel.luzanne@outlook.com)
- Joey Keen (Submitter 701) – [njkeens@gmail.com](mailto:njkeens@gmail.com)
- John and Suzanne Willetts (Submitter 702) – [s.willetts@xtra.co.nz](mailto:s.willetts@xtra.co.nz)
- John Phillips (Submitter 703) – 78 Domett Esplanade Greymouth 7802
- Karamea Aerodrome Inc (Submitter 705) – [karameaaeroinc@gmail.com](mailto:karameaaeroinc@gmail.com)
- Irene and Ken Tiller (Submitter 706) – [tillerbay7@gmail.com](mailto:tillerbay7@gmail.com)
- Kevin Smith (Submitter 707) – [kevinsmith.kiwi@gmail.com](mailto:kevinsmith.kiwi@gmail.com)
- Murray Gibson (Submitter 713) – [mrgibson@xtra.co.nz](mailto:mrgibson@xtra.co.nz)
- Nicholas Keen (Submitter 714) – [nicholas.keen@police.govt.nz](mailto:nicholas.keen@police.govt.nz)
- Paul Drake (Submitter 716) – [ekard@slingshot.co.nz](mailto:ekard@slingshot.co.nz)
- Paul Fraser (Submitter 717) – [outtarange12@gmail.com](mailto:outtarange12@gmail.com)
- Paul Murray (Submitter 718) – [paulm@pb.co.nz](mailto:paulm@pb.co.nz)
- Paul Scott (Submitter 719) – [scottptgy@xtra.co.nz](mailto:scottptgy@xtra.co.nz)

- Prue and Daimon Schawalger (Submitter 720) – [prue55@hotmail.com](mailto:prue55@hotmail.com)
- Punakaiki Farm Ltd (Submitter 721) – [info@pancake-rocks.co.nz](mailto:info@pancake-rocks.co.nz)
- Rae Reynolds (Submitter 722) – [rae.reynolds@gmail.com](mailto:rae.reynolds@gmail.com)
- Rebecca Blackhurst (Submitter 723) – [rebecca\\_blackst@hotmail.com](mailto:rebecca_blackst@hotmail.com)
- Ros Bradley (Submitter 725) – [rosb17@outlook.com](mailto:rosb17@outlook.com)
- Sam Carter (Submitter 726) – [samcarter2013@gmail.com](mailto:samcarter2013@gmail.com)
- Stephen and Pauline Tranter (Submitter 727) – [paulinetranter7@gmail.com](mailto:paulinetranter7@gmail.com)
- Steve Miller (Submitter 728) – [solak9@yahoo.com](mailto:solak9@yahoo.com)
- Stuart Liddicoat (Submitter 729) – [sliddicoat@electronet.co.nz](mailto:sliddicoat@electronet.co.nz)
- Tania Reynolds (Submitter 730) – [tania.reynolds@outlook.com](mailto:tania.reynolds@outlook.com)
- Tom McGaveston (Submitter 731) – [tom.mcgaveston@inforceglobal.com](mailto:tom.mcgaveston@inforceglobal.com)
- Trevor Reid (Submitter 732) – [trevreid5@hotmail.com](mailto:trevreid5@hotmail.com)
- Vanessa Kingan (Submitter 733) – [nesslewis@gmail.com](mailto:nesslewis@gmail.com)
- Vicki Stevenson (Submitter 734) – [michaelandvic@xtra.co.nz](mailto:michaelandvic@xtra.co.nz)
- William Sage (Submitter 735) – [wsage@xtra.co.nz](mailto:wsage@xtra.co.nz)
- Hans Gutenbrunner (Submitter 736) – [h.gut@xtra.co.nz](mailto:h.gut@xtra.co.nz)
- Laurie and Marlene Collins (Submitter 737) – [lauriecollins42@gmail.com](mailto:lauriecollins42@gmail.com)
- Susan Norgart (Submitter 738) – [susananorgart@yahoo.co.uk](mailto:susananorgart@yahoo.co.uk)
- Alan Paxton (Submitter 739) – [p.a.paxton@gmail.com](mailto:p.a.paxton@gmail.com)
- Ann Lamplough (Submitter 740) – 158B Peel Street Westport 7825
- Damer Farrell (Submitter 741) – [damer@xtra.co.nz](mailto:damer@xtra.co.nz)
- Derek Roberts (Submitter 744) – [derekroberts119@gmail.com](mailto:derekroberts119@gmail.com)
- Grant Rowberry (Submitter 746) – [grant.david.rowberry@gmail.com](mailto:grant.david.rowberry@gmail.com)
- Jane Abraham (Submitter 747) – 133/1 Powerhouse Road Fairdown Westport 7891
- Janette Donaldson (Submitter 748) – [janettekydd123@gmail.com](mailto:janettekydd123@gmail.com)
- Paul Reynolds (Submitter 756) – [jfhoney56@gmail.com](mailto:jfhoney56@gmail.com)
- Rachael Blick (Submitter 758) – 153 Peel Street Westport 7825
- Hamish Macbeth (Submitter 307) [hlmacbeth@yahoo.com.au](mailto:hlmacbeth@yahoo.com.au)
- Garry Duckett (Submitter 745) – 459 Utopia Road Westport 7892
- Kerera Corbett-Manera (Submitter 750) – [kereracorbettmanga@gmail.com](mailto:kereracorbettmanga@gmail.com)
- Anthea Keenan (Submitter 759) – [keenanr@kinect.co.nz](mailto:keenanr@kinect.co.nz)

10. 55 submissions were received following re-notification, and all within the timeframe agreed. These were from the following:

- Adriana de Ruyter James (Submitter 678) - [adriana.james59@gmail.com](mailto:adriana.james59@gmail.com)
- ADT Trust (Submitter 785) - [caleb@brownandcompany.co.nz](mailto:caleb@brownandcompany.co.nz)
- Andy and Shirley Nolan (Submitter 765) - [andyandshirley@hotmail.com](mailto:andyandshirley@hotmail.com)
- Ballin Family (Submitter 766) - [helen@novogroup.co.nz](mailto:helen@novogroup.co.nz)
- Barry Hughes (Submitter 773) - [bazh2011@gmail.com](mailto:bazh2011@gmail.com)
- Biggles Limited (Submitter 685) - [brett@townplanning.co.nz](mailto:brett@townplanning.co.nz)
- Charlie Johnson (Submitter 786) - [charlie@maintracgroup.com](mailto:charlie@maintracgroup.com)
- Christine Carter (Submitter 687) - [08002bwell@gmail.com](mailto:08002bwell@gmail.com)
- Christopher St Johanser (Submitter 780) - [cistjohanser@icloud.com](mailto:cistjohanser@icloud.com)
- Colin Reidy (Submitter 792) - [reido@xtra.co.nz](mailto:reido@xtra.co.nz)
- David Bloxham (Submitter 791) - [daveoz69@hotmail.com](mailto:daveoz69@hotmail.com)
- Deborah Kirkwood (Submitter 793) - [bj.roche@xtra.co.nz](mailto:bj.roche@xtra.co.nz)
- Desna Bruce Walker (Submitter 692) - [desnabruce@gmail.com](mailto:desnabruce@gmail.com)
- Department of Conservation (Submitter 602) - [mbrass@doc.govt.nz](mailto:mbrass@doc.govt.nz)
- Fiona Blair (Submitter 783) - [fi Blairh@hotmail.com](mailto:fi Blairh@hotmail.com)
- Forest Habitats Limited (Submitter 138) - [barry@macdonellconsulting.co.nz](mailto:barry@macdonellconsulting.co.nz)
- Gerrit Groeneveld (Submitter 794) - [gerrit1356@gmail.com](mailto:gerrit1356@gmail.com)
- Graham Sinclair (Submitter 769) - [yok@queenstown.co.nz](mailto:yok@queenstown.co.nz)
- Grant Gear (Submitter 782) - [grant.grear@ccep.com](mailto:grant.grear@ccep.com)
- Helen and Tom Sawyers (Submitter 674) - [h.tsawyers@xtra.co.nz](mailto:h.tsawyers@xtra.co.nz)
- James McElrea (Submitter 768) - [jamesmcelrea@gmail.com](mailto:jamesmcelrea@gmail.com)
- Jan Phillips (Submitter 796) - [jan.m.phillips@icloud.com](mailto:jan.m.phillips@icloud.com)

- Jane Whyte and Jeff Page (Submitter 467) - [jane@responseplanning.co.nz](mailto:jane@responseplanning.co.nz)
- Joshua Tranter (Submitter 675) - [joshmarkt@gmail.com](mailto:joshmarkt@gmail.com)
- Kathryn Wall (Submitter 771) - [kiwall65@gmail.com](mailto:kiwall65@gmail.com)
- Kevin Boyd (Submitter 787) - [kevin.capefoulwind@gmail.com](mailto:kevin.capefoulwind@gmail.com)
- Kevin Smith (Submitter 707) - [kevinsmith.kiwi@gmail.com](mailto:kevinsmith.kiwi@gmail.com)
- Michael and Vivian Nixon (Submitter 767) - [nixongang@xtra.co.nz](mailto:nixongang@xtra.co.nz)
- Michael Simon (Submitter 789) - [wangapekamgs@gmail.com](mailto:wangapekamgs@gmail.com)
- MTP Limited (Submitter 711) - [brett@townplanning.co.nz](mailto:brett@townplanning.co.nz)
- Natural Hazards Commission (Submitter 775) - [resilience@naturalhazards.govt.nz](mailto:resilience@naturalhazards.govt.nz)
- Neil Aldred (Submitter 770) - [dearneil@hotmail.com](mailto:dearneil@hotmail.com)
- Neu Tec Mining Limited (Submitter 779) - [neu-tecminingltd@hotmail.com](mailto:neu-tecminingltd@hotmail.com)
- Ngai Tahu (Submitter 620) - [TTW@ngaitahu.iwi.nz](mailto:TTW@ngaitahu.iwi.nz) and [Philippa.Lynch@ngaitahu.iwi.nz](mailto:Philippa.Lynch@ngaitahu.iwi.nz)
- Norma O' Dea (Submitter 788) - [norma.carters23@gmail.com](mailto:norma.carters23@gmail.com)
- Okarito Kayaks Limited (Submitter 774) - [kayaks@okarito.co.nz](mailto:kayaks@okarito.co.nz)
- P and A Horrell (Submitter 774) - [brett@townplanning.co.nz](mailto:brett@townplanning.co.nz)
- Pam Birmingham (Submitter 772) - [psbirm@yahoo.com](mailto:psbirm@yahoo.com)
- Paul Reynolds (Submitter 756) - [jfyhoney56@gmail.com](mailto:jfyhoney56@gmail.com)
- Paul Truman (Submitter 784) - [rest@awatunahomestead.co.nz](mailto:rest@awatunahomestead.co.nz)
- Pauline and Stephen Tranter (Submitter 727) - [paulinetranter7@gmail.com](mailto:paulinetranter7@gmail.com)
- Pauline Te Rakau (Submitter 776) - [hemiterakau@outlook.com](mailto:hemiterakau@outlook.com)
- Penny and Mark Rounthwaite (Submitter 778) - [Marounth@outlook.co.nz](mailto:Marounth@outlook.co.nz) or [Prounthm@outlook.com](mailto:Prounthm@outlook.com)
- Rae Reynolds (Submitter 722) - [rae.reynolds@gmail.com](mailto:rae.reynolds@gmail.com)
- Rex and Anthea Keenan (Submitter 763) - [keenanr@kinect.co.nz](mailto:keenanr@kinect.co.nz)
- Robert Schouten (Submitter 795) - No Email - Address: 9 Main Road Ngakawau 7824
- Ros Bradley (Submitter 725) - [rosb17@outlook.com](mailto:rosb17@outlook.com)
- Scenic Hotel Group (Submitter 483) - [sam@planzconsultants.co.nz](mailto:sam@planzconsultants.co.nz)
- Shelley Taylor (Submitter 790) - [shelley.taylor29@gmail.com](mailto:shelley.taylor29@gmail.com)
- Stuart Liddicoat (Submitter 729) - [sliddicoat@electronet.co.nz](mailto:sliddicoat@electronet.co.nz)
- Te Tai o Poutini Plan Committee (Submitter 171) - [doug.bray@wcrc.govt.nz](mailto:doug.bray@wcrc.govt.nz)
- Vance and Carol Boyd (Submitter 447) - [rvcnb@xtra.co.nz](mailto:rvcnb@xtra.co.nz)
- Wendy Stuart (Submitter 777) - [wendystuart45@yahoo.co.nz](mailto:wendystuart45@yahoo.co.nz)
- Westpower (Submitter 547) - [MartinK@xtra.co.nz](mailto:MartinK@xtra.co.nz)
- William and Glenda Karl (Submitter 781) - [raykarl@xtra.co.nz](mailto:raykarl@xtra.co.nz)

11. All 167 submissions received (i.e. the 112 received following initial notification and the 55 received following re-notification) are summarised in Appendix 1 to this report. This attachment is a Summary of Submissions Received by Plan Provision.
12. Following initial notification, the Submissions had been previously summarised in two Appendices – i.e. Appendix 1, being those specifically related to Coastal Natural Hazards Mapping and Appendix 2, being those on so-called “Other Parts” of the Plan. Initially those in Appendix 2 were deemed “out of scope”, because they did not relate specifically to Coastal Natural Hazards Mapping.
13. Following the decision to re-notify Variation 2 on the basis that a broader range of submissions can be accepted (i.e. those applying to provisions of relevance in the Plan’s natural Hazards Chapter, and particularly those Objectives, Policies and Rules of relevance), it is understood that all 167 submissions received will now be within scope. While it is noted that several submissions do *include* one or two points which may be outside the overall scope of the Variation, there are no submissions which could now in their entirety be deemed “out of scope”. The Independent Commissioners can decide whether or not any given submission point made by a particular submitter is out of scope, while the Reporting Planners will advise their views on any such submission points in the Section 42A Report.
14. Following re-notification, only one submission was received that was out of scope in its entirety. That was a submission relating to industrial zoning in the Buller area. The Submitter was advised that at the time, submissions were being received on Variation 2 only, that such a submission was

clearly outside the scope of that Variation itself, and the best opportunity to raise any such concerns will occur once decisions on the Commercial and Industrial Zones have been released and can be potentially appealed to the Environment Court. That particular submission has, therefore, been excluded from the Variation 2 process itself.

15. As was the case when Variation 2 was initially notified, a number of submitters who responded to its re-notification have asked to be heard in support of their submissions. The Hearing itself is scheduled for Tuesday 18 to Wed 19 March 2025 in Westport (NBS Theatre) and for Thursday 20 (Hokitika RSA) and Friday 21 (Hokitika St Johns) March 2025 in Hokitika. Should further time be required at what is expected to be a well-attended meeting on a Variation that has generated considerable public interest, the Hearing will be re-convened online during the week 24 to 28 March 2025.
16. Ten further submissions were received following the previous notification of submissions ahead of the decision to renotify Variation 2 in its entirety. Calling for Further Submissions is a required statutory step and typically does not generate high response.
17. It is recommended that the Committee accepts the Summary of Submissions contained within Appendix 1 and directs that the 10-working day period required for receiving Further Submissions commence on Friday 17 January 2025 and conclude on Friday 31 January 2025 at 5.00pm. This will ensure that any such Further Submissions received can be considered in a timely fashion by staff responsible for preparing the Section 42A Report and undertaking other requirements ahead of the Hearing itself.
18. The letter inviting submitters to make Further Submissions and the public notice to be inserted in local newspapers are included as Appendix 2 and 3. Consistent with submissions received both following initial notification and re-notification being accepted, further submissions received during the initial period 12 to 25 October 2024 and this period 17 to 31 January 2025 will both be considered by the Reporting Planners in preparing the Section 42A Report and the Independent Commissioners in making their decisions.

Doug Bray

**Senior Policy Planner (TPPP)**

"D"



# Te Tai o Poutini PLAN

A combined district plan for the West Coast

MINUTES OF MEETING OF TE TAI O POUTINI PLAN COMMITTEE HELD ONLINE VIA ZOOM AT 9.00AM ON  
16 JANUARY 2025

## Present

R. Williams (Chairman), Mayor T. Gibson (GDC), Cr B. Cummings (WCRC), Cr P. Haddock (WCRC),  
Kaiwhakahaere F. Tumahai (Ngāti Waewae), Cr A. Cassin (WDC), Cr G. Neylon (BDC), Mayor J. Cleine  
(BDC), Cr A. Gibson (GDC), Kaiwhakahaere P. Madgwick (Makaawhio), Mayor H. Lash (WDC)

## In attendance

Joanne Soderlund (GDC), Simon Pickford (BDC), Carissa du Plessis (BDC), J. Armstrong (TPPP Project  
Manager), Barbara Phillips (WDC), J. Allen (WCRC), Doug Bray (WCRC), Chu Zhao (WCRC), Olivia  
Anderson (WDC)

## Welcome

## Apologies

None received

Confirm minutes of the previous meeting held 12 November

R. Williams pointed out that the minutes of the 13<sup>th</sup> of December are not complete, so they will be  
confirmed in February.

R. Williams suggested that they only deal with the minutes of the 12<sup>th</sup> of November at this time.

**Moved** (Cr Haddock / Cr Cummings)

*That the minutes of the meeting held 12 November 2024 be confirmed*

*Carried*

## Report – Summary of Submissions Received on Te Tai o Poutini Plan Variation 2 – Coastal Hazards

Doug Bray briefly described the background and the renotification of Variation 2 in November. These  
submissions closed on the 19<sup>th</sup> of December. Approximately 1,700 properties were sent letters  
regarding the renotification.

D. Bray noted that 167 submissions were received in total - with 112 received following initial  
notification and 55 received following re-notification. He pointed out that the summary of  
submissions is listed in Appendix 1.

D. Bray commented that information about further submissions will be sent to all submitters  
tomorrow. They will have ten working days to make further submissions, closing at 5pm on Friday 31  
January 2025.

### EXHIBIT NOTE

This is the annexure marked "D" referred to in the annexed affidavit of  
**Lois Margaret Easton** sworn at Gisborne on this 15<sup>th</sup> day of April 2026  
before me:

.....  
**A Solicitor / Deputy Registrar of the High Court of New Zealand**  
**Julie Metrick**  
**Solicitor**  
**Gisborne**



# Te Tai o Poutini PLAN

A combined district plan for the West Coast

Moved (Cr Haddock/ Mayor Cleine)

1. *That the information be received.*
2. *That in accordance with Clause 7(1) of Schedule 1 of the RMA, the Summary of Submissions contained within Appendix 1 be accepted and publicly notified for the receipt of further submissions.*
3. *That in accordance with Clause 7(2) of Schedule 1 of the RMA, copies of both public notice and the Summary be served on those who lodged submissions.*
4. *That the required two-week period for receipt of further submissions open on 17 January 2025, with a closing time of 5pm on Friday 31 January 2025*

*Carried*

The next meeting will be held at Buller District Council on 25 February.

Meeting ended at 9.08 am.

## NEXT MEETING

Chairman

February 25, 2025

Date

"E"

Form 7

Notice of appeal to Environment Court against decision on proposed policy statement  
or plan or change or variation

*Clause 14(1) of Schedule 1, Resource Management Act 1991*

To the Registrar  
Environment Court  
Auckland, Wellington, and Christchurch

I, William (John) Currie, appeal against a decision (or part of a decision) of Te Tai O Poutini Plan Committee on the following policy statement (or plan or change or variation):

Te Tai O Poutini Plan [*state the name of the proposed or existing policy statement or plan or change or variation to which the decision relates*].

I made a submission on that policy statement – S764.(or plan or change or variation). I am not\* a trade competitor for the purposes of section 308D of the Act.

\*Select one.

\*I am directly affected by an effect of the subject of the appeal that—

(a) adversely affects the environment;

\*Omit paragraph if you are not a trade competitor.

†Select one.

I received notice of the decision on 10/10/2025.

The decision was made by Te Tai O Poutini Plan Committee.

The decision (or part of the decision) that I am appealing against is: [*state—*

The Industrial Zones in the Westport area.

- *a summary of the decision or part of the decision; and*
- *the specific provision or matter that the decision includes in, or excludes from, the policy statement or plan or change or variation (or that the decision proposes to include or exclude)].*

The reasons for the appeal are as follows:

I believe that the proposed industrial sites around Westport are incorrectly classified and the Stafford/Robertson Street site is an inappropriate site for industry.

I seek the following relief: Reclassify

the old cement works site at Cape Foulwind to General/Heavy industry. Remove the Stafford/Robertson Street site to an appropriate area like Cape Foulwind and reclassify the area to rural. Reclassify the other industrial zones around Westport to light industry.

I attach the following documents\* to this notice:

**EXHIBIT NOTE**

This is the annexure marked "E" referred to in the annexed affidavit of **Lois Margaret Easton** sworn at Gisborne on this *15<sup>th</sup>* day of April 2026 before me:

.....  
**A Solicitor / Deputy Registrar of the High Court of New Zealand**

**Julie Mettrick**  
**Solicitor**  
**Gisborne**

- (a) a copy of my submission *or* further submission (with a copy of the submission opposed or supported by my further submission):
- (b) a copy of the relevant decision (*or* part of the decision):
- (c) any other documents necessary for an adequate understanding of the appeal:

{Files as outlined in the appeal submission:}

Stafford and Robertson Street industries-working final 20Nov 2025

Submission on Industrial Zones biller District (original submission)

Industrial Area Jan 24 – Signed letter to BDC = Reply from Mayor –Mar 24

Coal Trucking 28 Nov 24

Letter from BDC 09Jun25 - noise

BDC District Plan – Analysing non compliance


Noise Times (11 files).

- (d) a list of names and addresses of persons to be served with a copy of this notice.

\*These documents constitute part of this form and, as such, must be attached to both copies of the notice lodged with the Environment Court. The appellant does not need to attach a copy of a regional or district plan or policy statement. In addition, the appellant does not need to attach copies of the submission and decision to the copies of the notice served on other persons if the copy served lists these documents and states that copies may be obtained, on request, from the appellant.

Westcoast Regional Council, PO Box 66 Greymouth, 7840. TTPP Committee – info@tpp.nz.

Date: 21 November 2025

Signature of appellant:   
(*or* person authorised to sign on behalf of appellant)

Address for service of appellant: 57 Stafford Street, Westport

Telephone: 03 789 7691

Fax/email: curriejohn789@gmail.com

Contact person: John Currie [*name and designation, if applicable*]

**Note to appellant**

*Appeals other than in relation to freshwater planning instruments*

You may appeal only if—

- you referred in your submission or further submission to the provision or matter that is the subject of your appeal; and
- in the case of a decision relating to a proposed policy statement or plan (as opposed to a variation or change), your appeal does not seek withdrawal of the proposed policy statement or plan as a whole.

The Environment Court, when hearing an appeal relating to a matter included in a document under [section 55\(2B\)](#) of the Act, may consider only the question of law raised.

#### *Appeals in relation to freshwater planning instruments*

You may appeal only if—

- you addressed in your submission or further submission the provision or matter that is the subject of your appeal; and
- the relevant regional council rejected a recommendation of the freshwater hearings panel and decided an alternative solution which resulted in—
  - (a) the provision or matter being included in the freshwater planning instrument; or
  - (b) the provision or matter being excluded from the freshwater planning instrument.

If a regional council decides to reject a recommendation of the freshwater hearings panel that is outside the scope of submissions, you may appeal to the Environment Court in respect of that decision or the alternative solution proposed by the council if you made a submission.

#### *Notes for all appeals*

Your right to appeal may be limited by the trade competition provisions in [Part IIA](#) of the Act.

You must lodge the original and 1 copy of this notice with the Environment Court within 30 working days of being served with notice of the decision to be appealed. The notice must be signed by you or on your behalf. You must pay the filing fee required by regulation 35.

You must serve a copy of this notice on the local authority that made the decision and on the Minister of Conservation (if the appeal is on a regional coastal plan), within 30 working days of being served with a notice of the decision.

You must also serve a copy of this notice on every person who made a submission to which the appeal relates within 5 working days after the notice is lodged with the Environment Court.

Within 10 working days after lodging this notice, you must give written notice to the Registrar of the Environment Court of the name, address, and date of service for each person served with this notice.

However, you may apply to the Environment Court under [section 281](#) of the Act for a waiver of the above timing or service requirements (*see form 38*).

## **Advice to recipients of copy of notice of appeal**

### *How to become party to proceedings*

You may be a party to the appeal if you made a submission or a further submission on the matter of this appeal.

To become a party to the appeal, you must,—

- within 15 working days after the period for lodging a notice of appeal ends, lodge a notice of your wish to be a party to the proceedings (in form 33) with the Environment Court and serve copies of your notice on the relevant local authority and the appellant; and
- within 20 working days after the period for lodging a notice of appeal ends, serve copies of your notice on all other parties.

Your right to be a party to the proceedings in the court may be limited by the trade competition provisions in [section 274\(1\)](#) and [Part IIA](#) of the Act.

You may apply to the Environment Court under [section 281](#) of the Act for a waiver of the above timing or service requirements (see [form 38](#)).

### *\*How to obtain copies of documents relating to appeal*

The copy of this notice served on you does not have attached a copy of the appellant's submission and (*or or*) the decision (*or part of the decision*) appealed. These documents may be obtained, on request, from the appellant.

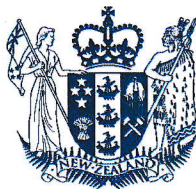
\*Delete if these documents are attached to copies of the notice of appeal served on other persons.

### *Advice*

If you have any questions about this notice, contact the Environment Court in Auckland, Wellington, or Christchurch.

Schedule 1 form 7: replaced, on 3 September 2020, by [regulation 7\(3\)](#) of the Resource Management (Forms, Fees, and Procedure) Amendment Regulations 2020 (LI 2020/180).

"F"



ENVIRONMENT COURT OF NEW ZEALAND

24 November 2025

In reply, please quote reference  
ENV-2025-CHC-000100

William (John) Currie  
Te Tai o Poutini Plan Committee

Dear Parties

Currie v Te Tai o Poutini Plan Committee

**EXHIBIT NOTE**

This is the annexure marked "F" referred to in the annexed affidavit of **Lois Margaret Easton** sworn at Gisborne on this 15<sup>th</sup> day of April 2026 before me:

A handwritten signature in blue ink, appearing to be 'Julie Mettrick'.

.....  
A Solicitor / Deputy Registrar of the High Court of  
New Zealand

**Topic(s): Appeals against the Te Tai o Poutini Plan - West Coast Districts**

**Julie Mettrick**  
Solicitor  
Gisborne

I acknowledge receipt on 24 November 2025 of:

- Appeal By Submitter On Proposed Policy Statement Or Plan pursuant to Clause 14 of the First Schedule of the Resource Management Act 1991
- one additional copy of the above
- filing fee of \$684.00
- notice of the name, address and date of service for each person served with the above application.

**Mediation**

This case may be able to be resolved by negotiation or mediation, rather than by a full hearing and a decision by the court. Mediation can be directed by an Environment Judge or requested at any time by the parties. Mediation is an informal process, where an independent person meets with the parties to help them to reach agreement on all or some of the questions in dispute. Mediation is a process, which can be relatively quick and inexpensive. Parties and their advisers can talk openly about the dispute and their attitudes to it. Any technical or legal questions can be identified and discussed.

A mediator does not judge the case or impose a decision, but helps the parties to see if they can reach an outcome of their own.

An Environment Commissioner of the Environment Court may be asked to act as mediator, see section 268(1) of the Resource Management Act 1991. The parties are not asked to pay his/her expenses. An Environment Commissioner acting as mediator will not be involved in hearing the appeal if agreement cannot be reached, and the case on the appeal will not be prejudiced by the mediation if it is not successful.

Environment Court of New Zealand  
20 Lichfield Street, Christchurch 8011 | WX11113, PO Box 2069, Christchurch 8013 | New Zealand

Phone: | Fax: (03) 365 1740

EC4100\_AcknowledgeCaseLodgement

If negotiation or mediation is not successful in resolving the case, the file is then returned to the control of the Case Manager and Judge.

The parties may agree to engage a private mediator instead of an Environment Commissioner. This would involve payment of the mediator's fees and expenses. A private mediator may be chosen because of special skills.

Further information about private mediators can be obtained from the Arbitrators' and Mediators' Institute, PO Box 1477, Wellington, or LEADR NZ (Inc), PO Box 10991, Wellington, email: leadrnz@xtra.co.nz or telephone: (04) 470 0110.

If the matter proceeds to hearing, you will be notified of any hearing date and time as well as the associated hearing and scheduling fees.

### **Case Management**

The Environment Court operates a caseflow management system for all proceedings filed with it. The Court will supervise or manage the time and events involved in the life of this case, from the time it is filed, to the time it is disposed of. Initially a copy of this appeal will be referred to an Environment Judge shortly after its filing for assignment to a case track.

#### **What is a case track?**

The Court specifically manages the flow of cases through a Case Tracking system, of which there are three distinct management tracks. They are:

#### **Standard:**

This management track will include most s.120 appeals, non-urgent enforcement proceedings and other miscellaneous proceedings. The Court will typically issue standard directions to the parties, with an emphasis on avoiding unnecessary court appearances at the interlocutory stage and a hearing within six months of commencement.

#### **Priority:**

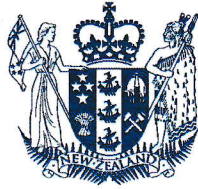
This track is for the more urgent cases, such as urgent enforcement proceedings; also appeals that the Court considers require priority resolution, or matters for which more intense case management is required.

#### **Parties On-Hold:**

Cases will be placed onto this track (unless the managing Judge otherwise directs) in circumstances where parties advise that they are not actively seeking a hearing to (for example) negotiate or mediate.

**Where your case has not already been assigned to a case track then the Managing Judge will allocate your case to a specific track and you will be notified of this by way of separate correspondence.**

Information about the Environment Court and its procedures can be found on the Ministry of Justice web site (<http://www.justice.govt.nz>) and is also available from the Ministry for the Environment (<http://www.mfe.govt.nz>).

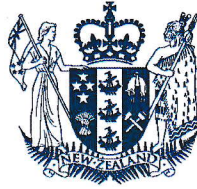


ENVIRONMENT COURT OF NEW ZEALAND

Please direct any correspondence or enquiries to myself as Case Manager for this matter and note the above Court reference.

A handwritten signature in blue ink, appearing to be 'S.P.' with a flourish.

Sophia Preston  
Hearing Manager  
**ENVIRONMENT COURT**  
Direct dial phone: 027 214 3320  
E-mail address: [Sophia.Preston@justice.govt.nz](mailto:Sophia.Preston@justice.govt.nz)



ENVIRONMENT COURT OF NEW ZEALAND

## **LIST OF PARTIES**

<b><u>Lodgement:</u></b>	<b><u>ENV-2025-CHC-000100</u></b>	<b><u>Currie v Te Tai o Poutini Plan Committee</u></b>
Initiator	Currie, William (John)	William (John) Currie, 57 Stafford Street, Westport
Respondent	Te Tai o Poutini Plan Committee	Kate Dickson, Wynn Williams & Co - Christchurch, P O Box 4341, DX WX11179, Christchurch
Respondent	Te Tai o Poutini Plan Committee	Lucy de Latour, Wynn Williams & Co - Christchurch, P O Box 4341, DX WX11179, Christchurch

"G"



5 December 2025

Attention: John Currie

John Currie  
57 Stafford Street  
Westport

By email to: curriejohn789@gmail.com

**EXHIBIT NOTE**

This is the annexure marked "G" referred to in the annexed affidavit of **Lois Margaret Easton** sworn at Gisborne on this <sup>15<sup>th</sup></sup> day of April 2026 before me:

.....  
**A Solicitor / Deputy Registrar of the High Court of New Zealand**

**Julie Mettrick**  
**Solicitor**  
**Gisborne**

Dear Mr Currie

**Withdrawal of Appeal ENV-2025-CHC-000100 on the Te Tai o Poutini Plan**

1. We act for the Te Tai o Poutini Plan Committee as the respondent in the above appeal.
2. We write in response to your appeal ENV-2025-CHC-000100, concerning Industrial Zones within the Buller District on the Te Tai o Poutini Plan (**TTPP** or **Plan**).
3. On behalf of our clients, we request that you withdraw your appeal, as it lacks standing because you did not lodge a valid submission on the Plan.

**Background**

4. On 20 November 2024, you attempted to lodge a submission on the proposed TTPP concerning Industrial Zones in the Buller District.
5. On 17 December 2024, you were advised via email that your 'submission' was unable to be accepted as it was received well outside the submission timeframe. The Plan was notified for submissions in mid-2022, with a Summary of Submissions Received compiled in April 2023. Further submissions on the Summary closed in May 2023, completing the submission process.
6. Your submission was received after the hearing of other submissions and evidence relating to Industrial Zones had been completed. Your submission could not be considered by the Independent Hearing Panel, and did not form part of the Panel's decision.

**Ability to appeal TTPP Committee's decision**

7. In order to file an appeal to the Environment Court regarding a provision in a plan, a person must have made a submission on the Plan.<sup>1</sup> As your submission was not accepted, a valid submission was not made on the Plan and therefore you have no standing for your appeal.
8. We understand that because you had lodged your proposed submission through the TTPP Committee's Spoken platform it was automatically allocated a submission number, despite being out of time. Because the submission number was automatically allocated, you then mistakenly received the email notifying you of the ability for submitters to appeal.
9. While we acknowledge that receiving this email may have resulted in some confusion, your ability to appeal is still restricted as you had not lodged a valid submission on the TTPP.
10. For this reason, we invite you to withdraw your appeal.

<sup>1</sup> Resource Management Act 1991, sch 1 cl 14(1)(a).

### Next steps

11. If your appeal is not withdrawn, we will apply to the Environment Court to strike out your appeal, under section 279(4) of the RMA.
12. Finally, while your appeal lacks standing, it may be possible for you to "become a party" to someone else's appeal under section 274 of the RMA. This is possible if you have an interest in that appeal that is "greater than that of the general public". Participating in an appeal as a section 274 party does not allow you to seek an outcome outside of that sought in that party's notice of appeal. We recommend you seek independent legal advice on this matter.
13. We look forward to your response.

Yours faithfully  
**Wynn Williams**



**Kate Dickson**  
Senior Associate

P +64 3 379 7622 M +64 27 353 3620  
E [kate.dickson@wynnwilliams.co.nz](mailto:kate.dickson@wynnwilliams.co.nz)


"H"

19 December 2025

Attention: Kate Dickson

@Wynn Williams.co.nz

By email to: [kate.dickson@wynnwilliams.co.nz](mailto:kate.dickson@wynnwilliams.co.nz)

**EXHIBIT NOTE**  
This is the annexure marked "H" referred to in the annexed affidavit of **Lois Margaret Easton** sworn at Gisborne on this <sup>15<sup>th</sup></sup> day of April 2026 before me:  
  
.....  
**A Solicitor / Deputy Registrar of the High Court of New Zealand**

**Julie Mettrick**  
**Solicitor**  
**Gisborne**

Dear Ms Dickson

I have been issued with a submission number for my submission into the ttp. Any problem with the issue of this number is not mine. My submission was lodged on the 21/1/2024 and it was not until the 27/11/2024 that I was issued with a submission number. Therefore a submission number was not automatically issued.

I have exposed some very glaring issues with the ttp regarding the proposed industrial zones in and around Westport. Therefore I'm very surprised that on reading and analysing my submission that the ttp committee is prepared to ignore these very important issues and continue with their current version of the plan.

Was not the ttp supposed to solve these types of problems and be a guiding light for the future of the Buller District and the rest of the Westcoast?

The legislated objectives outlined in the ttp are not being met in the proposal for the industrial zones in and around Westport. The serious issues/abnormalities that I have outlined do not meet these objectives.

I do care that under the ttp that the right things are done for the Buller and Westcoast. Excluding my submission would mean that the right things are not being done for the Buller District regarding the industrial zones in and around Westport.

Therefore I will **NOT** be withdrawing my appeal.

Yours faithfully



John Currie