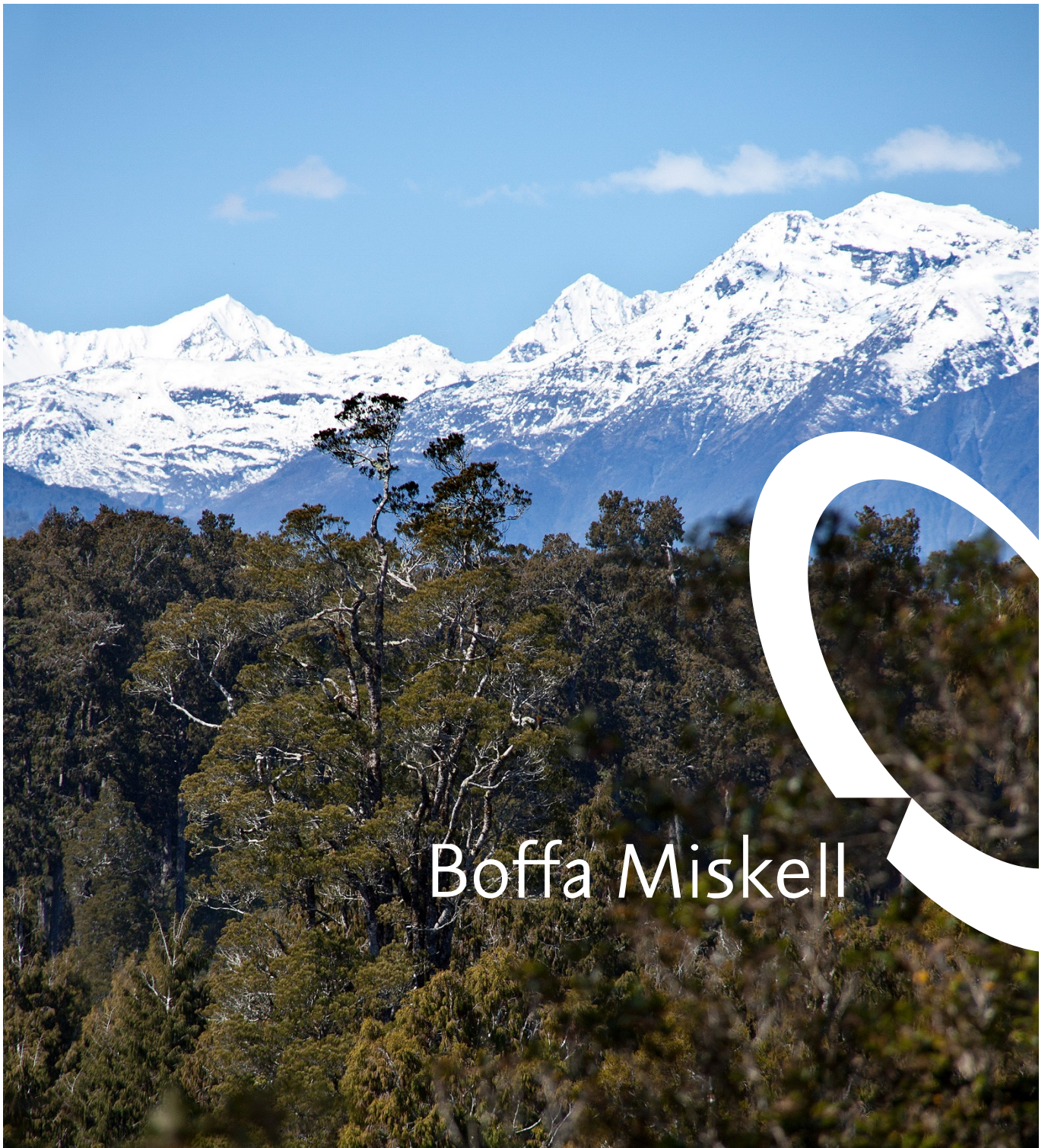


West Coast Regional Efficiency

Report on Resource Management Services




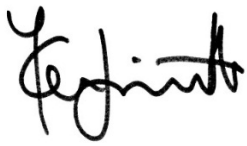
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FOREWORD

The Local Government Commission and the West Coast councils are pleased to release this report on options for strengthening Resource Management Act services in the West Coast region. The report was prepared by Boffa Miskell after discussions with local government, iwi, stakeholders and service providers.

The report arose from the Local Government Commission's offer to assist the West Coast councils with actions in their Commitment to Regional Efficiency work programme. This work programme identified a number of services currently being delivered individually by each council with the aim of investigating whether there were any efficiencies to be gained by combining these services regionally. The West Coast councils and the Local Government Commission identified two of the services, Resource Management Act services and transport arrangements, as priority areas for joint work on possible options. A separate report has been prepared on transport arrangements.

This report identifies the current challenges and opportunities for delivering cost effective and efficient Resource Management Act services in the West Coast region, together with a list of possible options for change. This work is a first step in developing a possible regional approach to sharing Resource Management Act services.

The next step is for the councils, together with the Commission, to decide whether further work on a potential option or options should be done. A shared approach by West Coast councils is a potential way of improving on the status quo and bringing about better services to benefit West Coast residents, ratepayers and businesses.

The Local Government Commission looks forward to continuing to work with the West Coast councils as we further develop our thinking about the best approach for Resource Management Act services on the West Coast.

Finally, our thanks goes to all those who made themselves available to talk to Boffa Miskell in the development of this report.

Dr Suzanne Doig

Chief Executive Officer

Local Government Commission

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EXECUTIVE SUMMARY

The Project

The Local Government Commission has been working with the four councils in the West Coast Region¹ to identify opportunities to improve local government service delivery in the region, including the provision of Resource Management (RM) services (including planning, consenting and compliance monitoring). This work is intended to be a key enabler to facilitate future economic development and wellbeing of the West Coast.

The purpose of this project is to achieve a shared understanding of the resource management related opportunities and challenges facing the region in order that a potential case for change can be developed. This report is intended to be used to inform discussion between the West Coast councils and the Commission about how more efficient and cost effective resource management services for the region could be delivered. Reflecting the requirements set out in the Terms of Reference, this report does not provide any specific recommendations concerning the way forward or any preferred option/s.

The terms of reference for this project states *“This project will be the first in a series of pieces of work. Several reports will be needed to identify preferred options and their associated costs and benefits before settling on an option for change (if any).”* The next steps for this project will be to determine which preferred option/s, if any, to consider further.

PART A: INPUTS

To better understand the current situation regarding the provision of resource management services on the West Coast and the potential implications for change, background research and information gathering was undertaken, and feedback from key stakeholders was sought.

Legislative Drivers and Statutory Position

Resource Management services are generally considered to broadly encompass the following functions: planning, consenting and compliance monitoring. These functions incorporate a range of activities including policy making, applicant advice, consent processing (with associated hearing and Environment Court processes), enforcement, and other associated procedures. Most RM services are driven by the Resource Management Act 1991 (RMA), which sets out the requirements and processes associated with these services. In addition to the legislation itself, there are associated National Policy Statements and National Environmental Standards. In addition to the RMA, the RM services undertaken on the Coast are often also influenced by the Conservation Act 1987 and the Crown Minerals Act 1991.

¹ West Coast Regional Council, Buller District Council, Grey District Council, and Westland District Council.

A high level review of current processes and plans utilised by the four West Coast councils highlighted that the key matters of significance are very similar across each of the districts, but there are differing approaches to managing nationally important resources such as outstanding landscapes between the three district plans. Two of the district plans (Buller and Westland) are activity based, while the Grey District Plan is effects based, and within the three district plans there is variation in the activity status and performance standards applying to similar activities e.g. mining. It is also noted that the different teams within each council have varying roles and responsibilities.

Stakeholder Feedback

To better understand the current situation and potential options for future change, input / feedback was sought from a range of parties. A set of common questions were developed and agreed with the Commission and these were then used to gain feedback on the issues. These questions dealt with the challenges / the current situation, and the opportunities and options.

The feedback received was mixed with a few matters that most people / groups agreed on and beyond these matters there was extreme variation in the views expressed. There was consensus around what was described by stakeholders as the “parochial nature” of the individual West Coast communities and the challenges this presents, together with concern around the tension between people / groups that are Pro-development and those who are Pro-environment. There was also agreement that change could be beneficial and there are many options that could be pursued.

The resource management issues that were raised by stakeholders relate particularly to:

- the range of environmental issues that are common across the region (i.e. coastal environment);
- the limited range of development opportunities (i.e. tourism); and
- overlap of processes between those administered by councils (e.g. consenting) and other bodies such as DoC (e.g. concessions).

There was a common view expressed by stakeholders that:

- the councils are generally trying to improve their services and work more closely together, regardless of the restrictions imposed by small teams and limited budgets, but
- the councils can be uncoordinated and can adopt a bureaucratic approach which is unnecessarily obstructive to development; and
- RM services can be piecemeal and disjointed, with poor communication and at times a lack of consistency of approach.

The feedback was clear that some collaboration has been a success (e.g. the joint submission on RMA reform), but that there have been a range of lost opportunities for closer collaboration (e.g. the development of common district plan sections / chapters). The key

outcomes sought for future joint processes include better alignment and consistency, better communication, clearer direction and leadership, and a better balance of social, cultural, environmental and economic issues.

There were a wide spectrum of views and each person or group's individual experiences with the councils were pivotal to informing their perspectives on RM service delivery. While there was a clear preference for greater combined services, there were quite polarised views expressed as to which council could, or should, take a lead in providing RM services for the West Coast, or indeed whether it should be a separate entity altogether.

West Coast Context

From a broader perspective, key challenges for the West Coast include:

- The population being low and dispersed over such a large area, with the largest urban area being Greymouth, means that adequately servicing the population is difficult and there is usually significant travel involved in undertaking activities such as monitoring.
- The low population and high level of public land means a low income base for the councils which impacts on funding for RM services, placing a greater emphasis on cost recovery for consenting and monitoring and reduced funding for policy development.
- Static or diminishing population, reduced employment and limited employment opportunities, and limitations on access to natural resources.
- The challenge of getting past the narrow focus of individual communities or districts which makes it hard for the whole of the region to think in an integrated manner and which may take some time to resolve.

Opportunities include:

- The process of establishing better communication and working relationships between councils at political, management and staff levels.
- The prospective National Planning Template, which may make the process of creating new planning documents for part, or all, of the West Coast a more straight forward task.

The information derived from these inputs was combined with a technical analysis calling on the extensive technical knowledge and experience relevant to district and regional plans and the in-depth knowledge of the RMA and its implementation held by the Boffa Miskell planning team.

PART B: OPTIONS

Options

A range of options for creating more efficient and cost effective resource management services on the West Coast in the short, medium and long-term have been identified:

Resource Management Team Related

1. Establish a single resource management team to deliver all regional and district RM services across the region.
2. Establish a single resource management team to deliver all district RM services across the region, with regional council related RM services delivered by a separate team.
3. Establish a single compliance monitoring team to service the combined districts / region.
4. Retain separate resource management teams but share staff resources across councils.
5. Retain separate resource management teams, but provide combined input into common “all of region” processes or issues.

Resource Management Document Related

6. Prepare a single unitary plan for the region that includes all regional plans and all district plan provisions.
7. Prepare a single district plan for the region that incorporates provisions applicable to all of the districts, with the regional policy statement (RPS) and regional plans remaining separate.
8. Retain separate district plans but include consistent provisions in each plan relating to common region-wide matters.
9. Commission joint RM research / studies to address issues that are common to the districts.

Process Related

10. Create common forms for use by all councils / three district councils.
11. Create common report templates for use by all councils / three district councils.
12. Initiate joint processes where one site / activity requires both district and regional consents.
13. Establish a common or joint approach to processes for engagement with tāngata whenua, and a commitment to building a strong relationship between the councils and tāngata whenua, in relation to resource management services.
14. Establish a common or joint approach to engagement with key stakeholder or interest groups where they deal with common issues across the region.

Option Analysis

In order to analyse the options, four packages of options on a low, medium and high scale of intervention were identified, as set out below.

The first two packages (low level change A and B) involve district council changes only. The medium level change also involves primarily district council changes but with a level of interaction with the regional council. The high level change involves a region-wide approach to all RM services.

The four packages are indicative only of the types of options that could be considered at each level and do not identify all possible individual options at a particular level.

Low level change (A): Retain separate regional and district plans and separate regional and district teams, but at district level develop as matters of good practice:

- Common forms and report templates
- Common or joint approaches for engagement with iwi and stakeholders with common interests across districts
- Shared input to regional council processes and issues
- Joint submissions on matters of common interest
- Joint district studies

Low level change (B): In addition to the above, agree at the district level to have:

- Shared staff resources between the district councils
- Consistent district plan provisions on common issues

Medium level change: All of the elements above in terms of low level change and in addition agree at the district level to have:

- One district plan (with separate regional plans)
- One resource management team including a compliance monitoring team
- Joint processes for applications requiring district and regional consents

High level change: All of the elements above in terms of low level change applicable to a region-wide approach, and in addition have:

- One unitary plan
- One region-wide resource management team, including a compliance monitoring team

The following advantages and disadvantages of each option, at either a combined district or region-wide level, were applied in the analysis:

Advantages:

- Better coordination and direction.
- An improved level of service for customers, with reduced duplication / overlap of services and greater clarity and consistency for users.
- Clearer policy direction and aligned provisions.
- Reduced time, cost and uncertainty for applicants.
- Shared skills and experience.

Disadvantages:

- Costs that would be incurred to set up new systems and plans.
- Geographic challenges given the dispersed population over such a large area.
- Public perception (and potential reality) of loss of local focus or influence.
- Potential for loss of efficiency within councils due to the loss of accessibility of RM team members.

The four packages of options are cumulative in nature although some individual options could be progressed independently. The first package of options builds on some initiatives already taken or at least tried by the councils, and the following packages then build on the first package.

The advantages and disadvantages of the options scale up and down depending on the individual option or combination of options. For example, a single RM team administering one unitary plan is likely to achieve maximum efficiency and maximise the advantages possible, but it would be the most costly and time consuming group of options to implement, and potentially result in the greatest perception of a loss of local focus or influence. At the other end of the scale, implementing any of the “quick wins” (common forms, common templates, joint processes at the district level) would be relatively simple to achieve but would have relatively small advantages overall.

PART C: NEXT STEPS

To assist the Commission and the councils to identify and assess options for further investigation, a set of possible more detailed evaluation criteria have been developed. These will enable evaluation of options against the status quo and enable evaluation against the goals of improvement of service and reduction of costs.

Evaluation criteria

The evaluation criteria proposed consider the extent to which an option changes the level of service to ratepayers / applicants, changes in efficiency or effectiveness / costs for councils, impacts on the four wellbeings², impacts on growth opportunities, and impacts on managing region wide issues.

The evaluation criteria are proposed to be applied in a matrix to consider the scale of impact and allow each option's analysis to be compared to others.

Future process

The Terms of Reference for this report did not require it to determine a preferred option or group of options. The future process between the councils and the Commission will determine which, if any, options are to be pursued. Future processes may involve feasibility reporting or more detailed implementation analysis to determine a more detailed process for taking any options forward. Such processes could also include processes such as establishing a combined committee of councils or a working party to investigate options.

² The four wellbeing's include environmental wellbeing, social wellbeing, cultural wellbeing, and economic wellbeing.

1.0 The Project

The Local Government Commission has been working with the four councils in the West Coast Region³ to identify opportunities to improve local government service delivery in the region, including the provision of Resource Management (RM) services (including planning, consenting and compliance monitoring).

This work is intended to be a key enabler to facilitate future economic development and wellbeing of the West Coast, noting that the four West Coast councils are already collaborating and seeking to introduce positive change as evidenced by their *Commitment to Regional Efficiency*⁴. Terms of Reference to guide this work have been prepared and are attached as **Appendix 1**.

The purpose of the project is to achieve a shared understanding of the resource management related opportunities and challenges facing the region in order that a potential case for change can be developed. In response, the Commission and the councils engaged Boffa Miskell Ltd (BML) to prepare a report that:

- describes current resource management services on the West Coast (in particular any collaboration or shared services);
- identifies the challenges and opportunities to the delivery of efficient, aligned, customer-centric and cost effective resource management services;
- provides a range of options for creating more efficient and cost effective resource management services in the region;
- details the advantages and disadvantages of the different options, in particular for the ratepayers and businesses of the West Coast; and
- identifies evaluation criteria to help in the selection of a preferred option or options for further investigation

This report is intended to be used to inform discussion between the West Coast councils and the Commission about how more efficient and cost effective resource management services for the region could be delivered. The terms of reference states that *“once there is broad agreement about an option or options for further investigation there will be discussions with the West Coast community”*⁵.

Reflecting the requirements set out in the Terms of Reference, this report does not provide any specific recommendations concerning the way forward or any preferred option/s.

In addition to this project, a complementary report into regional roading arrangements on the West Coast has also been commissioned. At the same time the Commission is running a

³ West Coast Regional Council, Buller District Council, Grey District Council, and Westland District Council.

⁴ The 4 West Coast Councils – A Commitment to Regional Efficiency, A Memorandum of Understanding under the West Coast Triennial Agreement 2014-2016, signed 14 October 2015.

⁵ Terms of Reference, paragraph 18.

separate parallel process considering local government structures and the delivery of local government services on the West Coast. This is in response to a reorganisation application it has received and involves extensive public consultation. This report does not seek to address either of the above matters.

The terms of reference for this project states *“This project will be the first in a series of pieces of work. Several reports will be needed to identify preferred options and their associated costs and benefits before settling on an option for change (if any).”*⁶ The next steps for this project will be to determine which preferred option/s to consider further.

It is also noted that the Tai Poutini West Coast Growth Study, Opportunities Report was publicly released on 20 September 2016⁷. This report was commissioned by the Ministry of Business, Innovation and Employment, in partnership with the Ministry for Primary Industries. The purpose of the study is to identify opportunities and related actions in the region that have the greatest opportunity to sustainably grow investment, employment and incomes. The report identifies a range of opportunities, and includes a short list of the highest priorities for the action plan which is intended to be developed by February 2017. The short list is:

- 1. Developing the tourism strategy and action plan to improve marketing, enhance and develop tourism products, and invest in visitor infrastructure and amenities at key locations. This includes determining the appropriate mix of funding options.*
- 2. Reviewing economic development arrangements in the region with a view to recommending a new governance, funding and delivery approach.*
- 3. Reviewing the objectives and investment approach of DWC, including developing a clear investment strategy that aligns with the outcomes and objectives of the growth study.*
- 4. Identifying the region as a priority for extension of UFB, RBI and mobile networks and accelerating the roll-out and implementation of West Coast digital enablement initiatives.*
- 5. Developing a single window regulatory processing hub to deal with permits, land access arrangements and consents in a streamlined way.*
- 6. Identifying areas of stewardship land with development potential that are of low conservation value.*

Opportunities 5 and 6 on this list were identified from the ‘Minerals and Related Processing’ section of the report and have some degree of overlap with RM services. In particular, the concept of a *“single window regulatory processing hub”* has direct relevance to the provision of RM services on the West Coast.

However, this report is limited to council only services and does not address possible options involving central government agencies.

⁶ Terms of Reference, paragraph 14.

⁷ <http://www.mbie.govt.nz/info-services/sectors-industries/regions-cities/regional-growth-programme/west-coast>

PART A: INPUTS

2.0 Methodology

To better understand the current situation regarding the provision of resource management services on the West Coast and the potential implications for change, background research and information gathering was undertaken, and feedback from key stakeholders was sought.

The background research undertaken for this report involved the identification and examination of the existing legislative resource management requirements for RM services, and the current RM processes and plans in place on the West Coast. This research is summarised in the sections below. The input / feedback from stakeholders was captured in a structured manner as set out below. In addition, a brief review was undertaken of any matters unique to the West Coast, including challenges and opportunities that impact on the West Coast context.

The information derived from these inputs was combined with a technical analysis calling on the extensive technical knowledge and experience relevant to district and regional plans and the in-depth knowledge of the RMA and its implementation held by the Boffa Miskell planning team.

2.1 Legislative Framework

Resource Management services are generally considered to broadly encompass the following functions: planning, consenting and compliance monitoring. These functions incorporate a range of activities including policy making, applicant advice, consent processing (with associated hearing and Environment Court processes), enforcement, and other associated procedures. There are a range of legislative requirements that relate to RM services (see extracts from key legislation in **Appendix 2**).

Most RM services are driven by the Resource Management Act 1991 (RMA), which sets out the requirements and processes associated with these services. The purpose of the Act is to promote sustainable management of natural and physical resources, which is underpinned by a set of principles relating to matters of national importance, other matters and the Treaty of Waitangi. The Act also sets out requirements for Regional Policy Statements, Regional Plans and District Plans, sets the process for resource consents (and appeals), and sets out processes for abatement notices and enforcement action.

In addition to the legislation itself, there are associated National Policy Statements and National Environmental Standards. National Policy Statements (NPS) state objectives and policies for resource management matters of national significance, with policies currently in place including freshwater, renewable electricity generation, electricity transmission and the

coastal environment⁸. National environmental standards (NES) are regulations issued under sections 43 of the Resource Management Act and apply nationally. The NES currently in place relate to air quality, sources of drinking water, telecommunication facilities, electricity transmission activities and contaminants in soil⁹. The policy statements and plans prepared by the councils are required to give effect to any NPS, including the New Zealand Coastal Policy Statement.

The Act therefore provides the legislative framework within which the four West Coast councils operate their RM services consistent with the council's functions prescribed in the Act and guided by the overarching purpose of achieving sustainable management.

Recent changes to the RMA have been made in order to reduce process uncertainty, time and cost and to create a system that enables growth while ensuring important environmental standards are maintained¹⁰. Further improvements are also contained in the recently introduced Resource Legislation Amendment Bill 2015. Proposed changes include achieving greater national consistency and direction, more responsive plan making processes, further simplification of the resource consenting system, recognition of the importance of housing affordability in planning, and greater alignment with other related legislation. These changes will impact on the RM services provided by all councils and are likely¹¹ to lead to the requirement for the councils to change the delivery and content of their plans and the way they exercise their RM responsibilities.

In addition to the RMA, and perhaps more so than for many councils, the RM services undertaken on the Coast are often also influenced by:

- The Conservation Act 1987. This Act establishes the Department of Conservation and sets out its functions; it also sets out the processes for concessions to use conservation land (leases, licenses, etc) and access arrangements. As the Crown agency responsible for some 83% of the land making up the West Coast Region, the Department has a major influence over land use and development.
- The Crown Minerals Act 1991. This Act deals with the exploration and prospecting for, and mining of, Crown owned minerals and thus strongly influences all mining activities undertaken on the Coast.

2.2 Current Processes and Systems

To better understand the context within which RM services are provided by the four West Coast councils a high level review of current processes and plans was undertaken. A summary of this review is contained in **Appendix 3**.

⁸ A proposed NPS on Indigenous Biodiversity was produced but has not progressed, and a proposed NPS on Urban Development Capacity is currently being progressed.

⁹ NES on Ecological Flows and Water Levels, and Plantation Forestry are under development.

¹⁰ The Resource Management (Simplifying and Streamlining) Amendment Act 2009 and the Resource Management Amendment Act 2013.

¹¹ The finalised content and timing of changes is unknown at the time of preparing this report.

This review highlighted that:

- All of the plans set out key matters of significance to their area and which address the resource management issues for that area. These are very similar across each of the districts.
- Two of the district plans (Buller and Westland) are activity based, while the Grey District Plan is effects based¹².
- Within the three district plans there is variation in the activity status and performance standards applying to similar activities e.g. mining.
- There are differing approaches to managing nationally important resources such as outstanding landscapes and indigenous biodiversity between the three district plans.
- All of the councils are working with operative plans of varying ages, with a number of plan review processes in progress at present (e.g. Buller Plan Changes 133 – 145, Regional Policy Statement, Regional Coastal Plan).
- The different teams have varying roles and responsibilities, including some council teams being required to contribute to local government functions beyond those related to RM services¹³.

2.3 Meetings and Interviews

2.3.1 Process

To better understand the current situation and to inform potential options for future change, input / feedback was sought from a range of parties. To achieve this a series of structured meetings and interviews were conducted. Where possible these meetings and interviews were held face to face. In a number of cases it was not possible to meet with people directly and in these situations either a telephone interview or correspondence by email were used to gain comparable feedback.

For all of the meetings, interviews and other opportunities for gathering feedback, a set of common questions were developed and agreed with the Commission. These were then used to gain consistent feedback on the issues. The questions posed to councils were tailored slightly differently from those posed to stakeholders; this was done in order to gain an understanding of the 'in-house' council perspective on particular issues. A copy of each of these sets of questions is included in **Appendix 4**. The questions acted as a means of initiating conversation and ensuring comparability between meetings, but the information gathered often went well beyond the questions and was strongly influenced by the personal experiences

¹² Activity-based plans centre on known activity types, or clusters of activities, and how they are to be managed. The approach is often used in conjunction with one of the other plan typologies such as 'zone' or 'topic-based' plans.

Effects-based plans are plans based around environmental effects rather than the activities that generate them.

¹³ These other functions include LIMs and PIMs, council policy under other legislation e.g. Local Government Act, and Bylaws.

of participants. A summary of the feedback received is available in a separate background report.

2.3.2 Groups / Stakeholders Involved

In setting up the meetings and interviews (and associated telephone conversations and email correspondence) approaches were made to a range of parties¹⁴. The basis of the list of parties was set out in the terms of reference for the project¹⁵.

Table 1: Parties from whom feedback was sought

Group	Parties
Councils	West Coast Regional Council Buller District Council Grey District Council Westland District Council
Iwi	Te Rūnanga o Ngāti Waewae Te Rūnanga o Makaawhio
Stakeholders	Mawhera Incorporated Tourism West Coast Development West Coast Minerals West Coast Bathurst Resources Buller Holdings / WestReef Solid Energy Ltd NZ Coal & Carbon Ltd West Coast Timber Association NZ Sustainable Forest Products Federated Farmers (West Coast Province) Department of Conservation Forest & Bird (West Coast branch) Buller Electricity West Power Westland Milk Products Westroads Greymouth Ltd New Zealand Transport Agency West Coast Planning Coastwide Resource Consultancy Ltd Chris J Coll Surveying Ltd

¹⁴ Not all parties approached were able to contribute to the process.

¹⁵ Terms of Reference, paragraph 16.

The meetings with the councils generally included the Chief Executive, the Planning Group Manager (or equivalent) and the Planning Manager / Team Leader (or equivalent). Where possible, other staff joined the meeting including those with roles relating to compliance monitoring.

The parties approached provide a good cross section of people and groups experienced in RM Services on the West Coast. These people and groups provide a regional overview of the implementation of RM Services across the region and represent a range of views.

2.3.3 What the Feedback Told Us

This section provides an overview of the responses received. The common questions discussed with the various parties were based around:

- The significant resource management issues and how they are being handled currently.
- How resource management services are being delivered, quality of decisions and experiences working with / between councils.
- Current joint service delivery, collaboration, coordination and alignment.
- Opportunities for greater joint service delivery or collaboration.
- Advantages and disadvantages of greater joint service delivery or collaboration, and obstacles or challenges of achieving greater joint service delivery or collaboration.
- Issues relating to the potential for trade-offs' or concessions that reduce local discretion if there were to be joint service delivery or collaboration processes.

In general, there were a few key matters that most people / groups agreed on but beyond this there was extreme variation in the views expressed.

Overall there were some strong themes which emerged from the responses received, particularly:

- The individual West Coast communities are focussed on their own area or district, and this presents challenges in bringing everyone together on issues.
- There is a strong and obvious tension between people / groups that are Pro-development and those who are Pro-environment.
- There are benefits to be gained from potential change and a desire for RM services to be more effective and efficient, although differences were expressed as to the degree of change required. In this regard, there was acknowledgement that some changes are already occurring such as joint processing of consents.
- There are many options that could / should be pursued for greater joint service delivery or collaboration.

The key resource management issues that were raised relate particularly to the range of environmental issues that are common across the region (i.e. coastline, natural hazards, biodiversity) and the limited range of development opportunities (i.e. agriculture, minerals, tourism).

Many issues raised by stakeholders relate to matters that are largely out of the hands of council or are required by legislation e.g. processing requirements under the Resource Management Act. There was also a clear degree of concern from stakeholders over factors such as lack of growth, loss of jobs, de-population, loss of skills, limited development opportunities and low business confidence, all of which have limited ability to be influenced through RM services.

There was a common perception expressed by stakeholders that the councils can be uncoordinated and can adopt a bureaucratic approach which is unnecessarily obstructive to development. There also appears to be a perception of overlap of processes between those administered by councils (e.g. consenting) and other bodies such as Department of Conservation (e.g. concessions).

In terms of present council performance, there was also a strong theme from stakeholders that the councils are generally trying to improve their services and work more closely together, regardless of the restrictions imposed by small teams and limited budgets. Many stakeholders commented that council staff are good to work with. However, there remains a perception from some that RM services are piecemeal and disjointed, with insufficient communication and at times a lack of consistency of approach leading to both uncertainty and inconsistency of outcome.

A range of joint service delivery and collaboration projects and processes have already been initiated between the councils, with some having notable success (e.g. the joint submission on RMA reform). There also appears to have been a range of lost opportunities for closer collaboration including the development of common district plan sections / chapters.

The key outcomes sought by both the councils and the stakeholders for future joint processes include better alignment and consistency (of rules, interpretation and approaches to consenting), improved communication, clearer direction and leadership, and a greater balance of social, cultural, environmental and economic issues.

In terms of advantages of change, the common responses across all parties related to the ability to gain greater consistency and simplicity in the approach to RM services across the region, and the ability to reduce time, cost and uncertainty for applicants. There was also clear direction that some of the change options could lead to better public perception and aligned direction for the Coast as a whole. In terms of potential disadvantages, concern was raised over geographic issues given the scale of the region and the desire to retain local connections.

Due to the wide ranging spectrum of views, it became apparent that each person or group's individual experiences with the councils were pivotal to informing their perspectives on RM service delivery. For example, those who had good experiences or relationships with the regional council tended to favour that council taking over a range of roles and responsibilities.

Alternatively, some who had good experiences or relationships with one or more district councils advocated for the regional council roles to be absorbed into the district councils.

With most people / groups advocating for greater combined services, there were quite polarised views expressed as to which council could, or should, take a lead in providing RM services for the West Coast as a whole, or indeed whether it should be a separate entity altogether.

Overall, the feedback received was mixed but some key statements that stood out included:

“change is daunting especially with a lot of change already having happened on the Coast”

“parochialism not a good reason to not take a hard look at the future and seek change for the better”

“big gains need big change, there is no point in just making small changes”

2.4 The West Coast Context

Part of the brief for this project was to identify any unique resource management challenges, demands, and pressures facing the West Coast Region. In considering this, it is important to note that the West Coast councils are subject to the same legislative framework (see section 2.1 of this report) as all other councils in New Zealand, and thus are not subject to any distinctive or different legislative drivers relating to their core RM functions.

However, the West Coast has some unique features that present challenges to the effective and efficient delivery of RM services. These include:

- The low population base – around 33,000 people¹⁶, which equates to less than 1 percent of New Zealand’s population.
- The geographic distance – the length of the region is some 600 km, or greater than the distance between Auckland and Wellington.
- The low ratio of people to land area – 23,000 square kilometres of land¹⁷, or nearly 70 hectares/person.

The population being low and dispersed over such a large area, with the largest urban area being Greymouth, means that adequately servicing the population is difficult and there is usually significant travel involved in undertaking activities such as monitoring.

- The low rates base – its population ranks 16th in size out of the 16 regions in New Zealand.
- The large area of the region which is public land – around 83% is in Department of Conservation ownership – which is generally non-rateable.

¹⁶ 2013 Census count 32,148 people usually resident in the West Coast Region.

¹⁷ Which is 8.5% of New Zealand’s land area.

The low population and high level of public land means a low income base for the councils which impacts on funding for RM services, placing a greater emphasis on cost recovery for consenting and monitoring and reduced funding for policy development.

- The high ratio of politicians to population – approximately 1 councillor for every 1,000 people¹⁸.

This means that the people on the West Coast are highly represented in local government issues, particularly compared to most other parts of the Country.

Although not necessarily unique to the Coast, some additional relevant factors that impact on the provision of RM services include:

- Static or diminishing population.
- Reduced employment and limited employment opportunities.
- Limitations on access to natural resources.

These factors mean that the ability to maintain employment and opportunities for growth and development are highly valued by the community. This, in turn, creates potential tensions between development and protection of the natural resources within the region.

The nature of the West Coast region having a few urban centres within a large rural setting is both a challenge and an opportunity. The challenge is in balancing the unique urban issues with the wider regional issues. Meanwhile the opportunity is in coordination of the regional issues that have commonality across the wider environment, including the coastline, landscapes, biodiversity and natural hazards.

There are also some challenges and opportunities to the delivery of efficient, cost effective resource management services in the region that are time based (e.g. in the short, medium and long term). These include the short term challenges of aligning direction and priorities between the four current councils, each of which operate under different processes and systems. There is also a challenge in accepting the parochial nature of each area and working together for the region as a whole. There is also a short term opportunity in that the process of establishing better communication and working relationships between councils at political, management and staff levels is a process that can be initiated immediately.

A longer term opportunity for both efficiency and consistency is the prospective National Planning Template, which may make the process of creating new planning documents for part, or all, of the West Coast a more straight forward task. Also any process in which the councils work together is an opportunity for them to retain an aligned approach in the longer term and a stronger cross council relationship.

¹⁸ 33 Councillors across the four councils.

2.5 Planning Experience and Knowledge

In order to develop the options set out in Part B of this report, the various inputs described above have been utilised – the legislative drivers, the current state of play, the responses provided by the councils and stakeholders, and the current West Coast context. These matters above have been evaluated and analysed to determine the range of appropriate options available.

In analysing the above information, the Boffa Miskell planning team called upon their established track record in the evaluation of planning frameworks for a wide range of local authorities, including the review of existing district and regional plans and preparation of new district and regional plans. This was combined with the team's extensive experience in using district and regional plans for consenting or assessing proposals across New Zealand, and the associated thorough understanding of how resource management services are provided in a range of ways across different districts and regions.

PART B: OPTIONS

Based on the inputs set out in Part A of this report, it is apparent that there are some common themes. The inputs utilised to inform this part of the report include:

- the legislative drivers,
- the current state of play within each council,
- the responses provided by the councils and stakeholders,
- the current West Coast context, and
- evaluation and analysis from an experienced planning team.

3.0 Options and Option Analysis

3.1 Options

A range of options for creating more efficient and cost effective, joint and collaborative resource management services on the West Coast in the short, medium and long-term have been identified. These are:

3.1.1 Resource Management Team Related¹⁹

1. Establish a single resource management team to deliver all regional and district RM services across the region.
2. Establish a single resource management team to deliver all district RM services across the region, with regional council related RM services delivered by a separate team.
3. Establish a single compliance monitoring team to service the combined districts / region.
4. Retain separate resource management teams but share staff resources across councils to deal with such matters as overflow workloads or to provide technical expertise.

¹⁹ This report has not explored how such a team may be structured or located which may be key issues to delivery.

A single team would not necessarily need to be located in one place e.g. following amalgamation of Banks Peninsula District Council with Christchurch City Council, service centres remained in the former Banks Peninsula area.

A combined resource management team could sit under one of the councils, or as a separate organisation. It could be formed as a as a resource management services company like the former Civic Corp (Queenstown).

Each of the possibilities have advantages and disadvantages that would need to be explored if a combined resource management team approach was pursued.

5. Retain separate resource management teams, but provide combined input into common “all of region” processes or issues e.g. submissions from the whole of the region to central government processes such as Resource Management Act reforms.

3.1.2 Resource Management Document Related

6. Prepare a single unitary²⁰ plan for the region that includes all the regional plans²¹ and district plan provisions²².
7. Prepare a single district plan for the region that incorporates provisions applicable to all of the districts²³, noting that the regional policy statement (RPS) and regional plans would remain separate. (A range of options are available for preparing a combined plan including activity vs effects based, and with or without variations to recognise local differences.)
8. Retain separate district plans but include consistent provisions in each plan relating to common region-wide matters e.g. network utility rules.
9. Commission joint RM research / studies to address issues that are common to the districts e.g. landscapes²⁴, coastline²⁵, hazards, natural character²⁶.

3.1.3 Process Related

10. Create common forms for use by all councils / three districts e.g. consent application forms.
11. Create common report templates for use by all councils / three districts e.g. consent notification report.
12. Initiate joint processes where one site / activity requires both district and regional consents, this may include one joint request for further information, joint reporting, joint hearings etc.
13. Establish a common or joint approach to processes for engagement with tāngata whenua, and a commitment to building a strong relationship between the councils and tāngata whenua, in relation to resource management services.

²⁰ A unitary plan includes both district and regional functions.

²¹ In relation to the inclusion of regional provisions – a unitary plan may or may not also incorporate the Regional Policy Statement.

²² Examples include the Proposed Auckland Unitary Plan, the Proposed Marlborough Environment Plan, the Gisborne District Council Combined Regional Land and District Plan, the Nelson Resource Management Plan, and the Tasman Resource Management Plan.

²³ Wairarapa Combined District Plan (covering three Wairarapa District Councils (Masterton, Carterton and South Wairarapa).

²⁴ Canterbury Regional Landscape Study, Wellington Regional Landscape Study.

²⁵ Canterbury Regional Coastal Study.

²⁶ Waikato Region.

14. Establish a common or joint approach to engagement with key stakeholder or interest groups where they deal with common issues across the region e.g. minerals.

Although many of these options are inter-related some could be progressed independently from the others. Regardless, there would be obvious advantages in pursuing some of these options collectively e.g. one team administering one plan. It is also important to recognise that some options are already being pursued to some extent e.g. joint submissions or have been attempted in the past.

Some key observations regarding these options are as follows:

- Some options would be more easily achieved in the short term and could be seen as “quick wins”. These would not involve significant time or cost to achieve, but may not deliver significant efficiency gains in the long term. Such options at the district level include; common forms, common templates and some joint processes.
- Options that would deliver increased long term cost savings and benefit to customers / ratepayers are also likely to present the greatest implementation challenges. For example, creating a single unitary plan would be time consuming and costly²⁷ to implement but would derive significant benefit to all users over the long term.
- The options relating to the creation of a single resource management team do not necessarily lead to a requirement for additional resource (i.e. more staff), but rather enable reallocation of existing resources more efficiently. The real opportunity for gain in these options is around the ability for the combined resources to avoid overlap of tasks / functions to free up resources to undertake additional work that is either not done currently, or not done sufficiently e.g. district council level monitoring, policy review. Such a team would be better focussed on achieving statutory timeframes and priorities if it is removed from other non-RM pressures.
- Some options represent a response to particular circumstances rather than an ongoing action per se, with the underlying action being a commitment to work together on issues that relate to the region as a whole or to more than one part of the region. This particularly relates to occasions where a joint submission may be appropriate or where shared research / studies are relevant.

3.2 Analysis of Options

In order to analyse the options four packages of options on a low, medium and high scale of intervention were identified as set out below.

The first two packages (low level change A and B) involve district council changes only. The medium level change also involves primarily district council changes but with a level of interaction with the regional council. The high level change involves a region-wide approach to all RM services.

²⁷ Actual costs have not been calculated as part of this report.

The four packages are indicative only of the types of options that could be considered at each level and do not identify all possible individual options at a particular level.

Low level change (A): Retain separate regional and district plans and separate regional and district teams, but at a district level develop as matters of good practice:

- Common forms and report templates
- Common or joint approaches for engagement with iwi and stakeholders with common interests across districts
- Shared input to regional council processes and issues
- Joint submissions on matters of common interest
- Joint district studies

Low level change (B): In addition to the above, agree at the district level to have:

- Shared staff resources between the district councils
- Consistent district plan provisions on common issues

Medium level change: All of the elements above in terms of low level change and in addition agree at the district level to have:

- One district plan (with separate regional plans)
- One resource management team including a compliance monitoring team
- Joint processes for applications requiring district and regional consents

High level change: All of the elements above in terms of low level change applicable to a region-wide approach, and in addition have:

- One unitary plan
- One region-wide resource management team, including a compliance monitoring team

The feedback received identified a range of advantages and disadvantages from various change options. The most commonly identified of these, as set out below, were then used for the purpose of analysis of the four groups of options.

Advantages:

- Better coordination and direction across the region.
- An improved level of service for customers, with reduced duplication / overlap of services and greater clarity and consistency for users.
- Clearer policy direction and aligned provisions.

- Reduced time, cost and uncertainty for applicants.
- Shared skills and experience.

Disadvantages:

- Costs that would be incurred to set up new systems and plans.
- Geographic challenges given the dispersed population over such a large area.
- Public perception (and potential reality) of loss of local focus or influence.
- Potential for loss of efficiency within councils due to the loss of accessibility of RM team members.

The analysis of the options is set out in the tables below:

Low level change (A): This option focuses solely on the district councils taking common approaches on RM matters such as forms, report templates, consultation with iwi and stakeholders, joint submissions and joint studies on issues of common interest. In some cases it would build on initiatives already undertaken or tried by the three West Coast district councils. It can be seen as a starting point for the councils to work more collaboratively.

Advantages	Disadvantages
<ul style="list-style-type: none"> • Good quality common forms and report templates would be developed making the best use of the combined experience and expertise of the staff of the three councils • Common forms would have the advantage of requiring consistent information from applicants working across more than one council • Common forms and report templates would reduce duplication when changes are required e.g. as a result of legislative change • Common report templates would be easier for applicants and the public to understand RM processes and decisions made • Common report templates would make it easier to align decisions across the councils and to ensure the same or similar approach to issues • Common or joint engagement processes would make it easier for iwi and other regional stakeholders to be involved in RM processes and are more likely to ensure the councils' obligations are achieved and the requirements of the Resource Management Act are achieved • Robust engagement processes built in relation to RM services have the potential to assist with the wider relationships between the councils and tāngata whenua and other stakeholder groups • Joint submissions would result in the three councils speaking with one voice to other parties and therefore likely to have more impact • Joint studies would be more cost effective for the councils and potentially save time and resources for interested parties • Joint studies will enable issues that cross territorial boundaries to be dealt with seamlessly and consistently, enable a shared understanding of the facts and lead to the ability to take a consistent approach to the issues • These options can be implemented quickly at minimal cost 	<ul style="list-style-type: none"> • The development of common forms and report templates would require staff time and some initial one-off costs • The common forms and report templates would need to be consistently used and monitored for any required future changes including ongoing alignment between the councils • Agreeing common or joint engagement processes would require both elected members' and staff time to develop • Processes that achieve genuine engagement may be more costly and time consuming than simple consultation processes • There could be difficulty in carrying out joint engagement processes as different councils may not be working on the same issue or process at the same time • Preparing joint submissions would require both elected members' and staff time to prepare and there may be some difficulty for the councils at times to agree key issues and priorities • The councils may have some difficulties in agreeing the priority, scope and cost sharing basis for joint studies

Low level change (B): This option still focuses solely on the district councils and *in addition* to the options under Low level change (A), involves the councils sharing staff resources to help smooth out work flows and share expertise, and the councils adopting consistent district plan provisions on matters of common interest or concern.

Advantages	Disadvantages
<ul style="list-style-type: none"> • Sharing staff resources to smooth workflows across the councils would reduce pressure on staff and help councils meet quality and timeliness expectations • The ability to share technical expertise between the councils would help the councils achieve desired outcomes and meet other expectations and obligations • Shared technical expertise is likely to reduce costs (as compared to using consultants) at least over the longer term • Consistent district plan provisions would ensure a consistent approach is taken by the councils to issues of common interest and concern across the districts • Consistent district plan provisions would assist understanding by the public generally and applicants in particular in relation to RM matters and make for more efficient application / consent processes • Sharing staff resources and consistent district plan provisions would assist in the promotion of good working relationships between the councils by requiring agreements on these matters 	<ul style="list-style-type: none"> • There are risks of a council sharing staff resources with another council then not having sufficient resources if unexpected work occurs and the agreement is not sufficiently flexible • The councils may have some difficulties in agreeing the basis of sharing staff resources and cost allocations • There may be perceptions that consistent district plan provisions will result in a loss of recognition of important local issues and concerns • Reaching agreement on consistent district plan provisions would involve time and cost for both elected members and council staff, and will require alignment of priorities • These processes would require a robust project management approach and the appointment of a lead agency to act on behalf of the group of councils, to smooth the process and avoid misunderstandings or inefficiencies

Medium level change: This option still focuses primarily on the district councils and assumes adoption of all the low level changes above as appropriate. This option includes the addition of agreement by the district councils to have one resource management team and adopt one district plan. The option also involves some interaction with the regional council through agreed joint processes for applications requiring both district and regional consents.

Advantages	Disadvantages
<ul style="list-style-type: none"> • One district RM team would enable a greater focus on appropriate district outcomes and priorities across the West Coast, due to delivery of RM services being guided by a single, agreed direction • One district RM team would allow for closer coordination between RM staff, the sharing of skills and resources and also for more specialisation by team members • One district RM team would provide an opportunity to achieve efficiency gains and economies of scale for consent processing • One district RM team would improve the level of service to ratepayers and customers by having all RM services consolidated into one team rather than having wider council roles and responsibilities. This increases clarity and transparency for users • One district RM team would enable key contacts to be established with applicants enhancing the ability to be customer focussed and for there to be consistent advice and administration of the plan/s • One district RM team would ensure a coordinated approach to issues that cross territorial boundaries e.g. hazards, and a consistent approach to wide spread activities e.g. mining, roading, electricity supply • One district RM team would enable effective monitoring to be carried out and result in better compliance and/or enforcement • One district plan would ensure that all RM matters at a district level on the West Coast are coordinated and aligned which would assist public understanding and confidence, reduce time, cost and uncertainty for 	<ul style="list-style-type: none"> • Governance responsibility in relation to one district RM team involving three councils would be less clear unless specific processes are put in place to provide delegated powers or similar • If there was one district RM team based at one location, there could be reduced accessibility for local communities for ‘over the counter’ advice and service (could be addressed by the use of service centres) and a public perception that if there is one team located in one town, it is less able to respond to the issues relevant to the wider region • Depending on the location of one district RM team, there is the potential for loss of existing experienced staff if this is not their preferred location • One district RM team could impact on staffing for other council non-RM functions such as general policy, bylaws, assistance with building consents etc. • It would be time consuming for both elected members and staff and be costly to create one district plan (currently two of the district plans are activity based and one is effects based) • One district plan could lead to a loss (or perceived loss) of recognition of local issues or area specific needs • If there was to be one district plan administered by more than one team, there could be the perception (or reality) of inconsistent interpretation or administration of the plan between different teams • Developing one district RM team and one district plan may require complicated funding and/or cost sharing arrangements

applicants, and address public perceptions of duplication between the district councils

- **One district plan** would facilitate better working relationships between the councils as they would be required to be aligned on the issues covered by the plan
- **One district plan** removes the need for each council / council staff to have input / make submissions etc. to other councils' plans, and reduces the need for multiple plan changes and input from the community on multiple plans
- **Joint consent processes** with the regional council would reduce the perceived duplication / overlap between the regional and district levels
- **Joint consent processes** would reduce time, costs and possible frustration for individuals requiring consents from both regional and district levels
- **One district RM team** and **one district plan** could result in efficiencies over the longer term resulting from such things as one IT system and common procurement (e.g. legal and technical)

High level change: This option relates to a region-wide approach on all RM matters including one RM team for the Coast (district and regional council roles) and one unitary plan for the region addressing both regional and district matters.

Advantages	Disadvantages
<ul style="list-style-type: none"> • One RM team for the Coast would have the advantages of one district RM team as identified above, as well as further benefits of a ‘whole of Coast’ focus by staff on RM issues • One RM team for the Coast would avoid perceptions of duplication through the provision of advice involving both regional and district perspectives • One RM team for the Coast would lead to efficiencies and effectiveness in consenting and monitoring and enforcement involving regional and district activities • A unitary plan would ensure all regional and district RM matters are aligned enabling common issues (e.g. coastline, hazards) to be considered and provided for consistently across the Coast • A unitary plan would ensure that all RM matters are located in one document / set of documents with a common structure and consistent definitions and terminology, making it easier for users • A unitary plan would mean reduced time, cost and uncertainty for applicants requiring consents at both district and regional council levels • A unitary plan removes the need for each council / council staff to have input / make submissions etc. to other councils’ plans, and reduces the need for multiple plan changes and input from the community on multiple plans • Common stakeholders across all four councils would only need to engage in the resource management process once for a unitary plan • These approaches would facilitate a better working relationship between the district councils and the regional council as they would need to be aligned on the issues that the plan represents 	<ul style="list-style-type: none"> • One RM team for the Coast would have the disadvantages of one district RM team as identified above, which may be exacerbated in some cases such as more complicated governance arrangements and reduced accessibility for ‘over the counter’ advice • It is likely to be more difficult to select a lead agency / location for one RM team for the Coast given the challenges in achieving a whole of Coast focus • One RM team for the Coast may have disadvantages if district councils and the regional council adopt different standards / have different approaches to issues impacting on the provision of RM services e.g. different engineering standards • It would be even more time consuming for elected members and staff and more costly to create a unitary plan (than one district plan) as it would mean that the current district and regional provisions would need to be assessed and aligned • There may be a greater likelihood of concerns about a loss of recognition of local issues or area specific needs with a unitary plan • Developing one RM team for the Coast and a unitary plan is likely to require more complicated funding arrangements and cost sharing arrangements than for one district plan / one district RM team

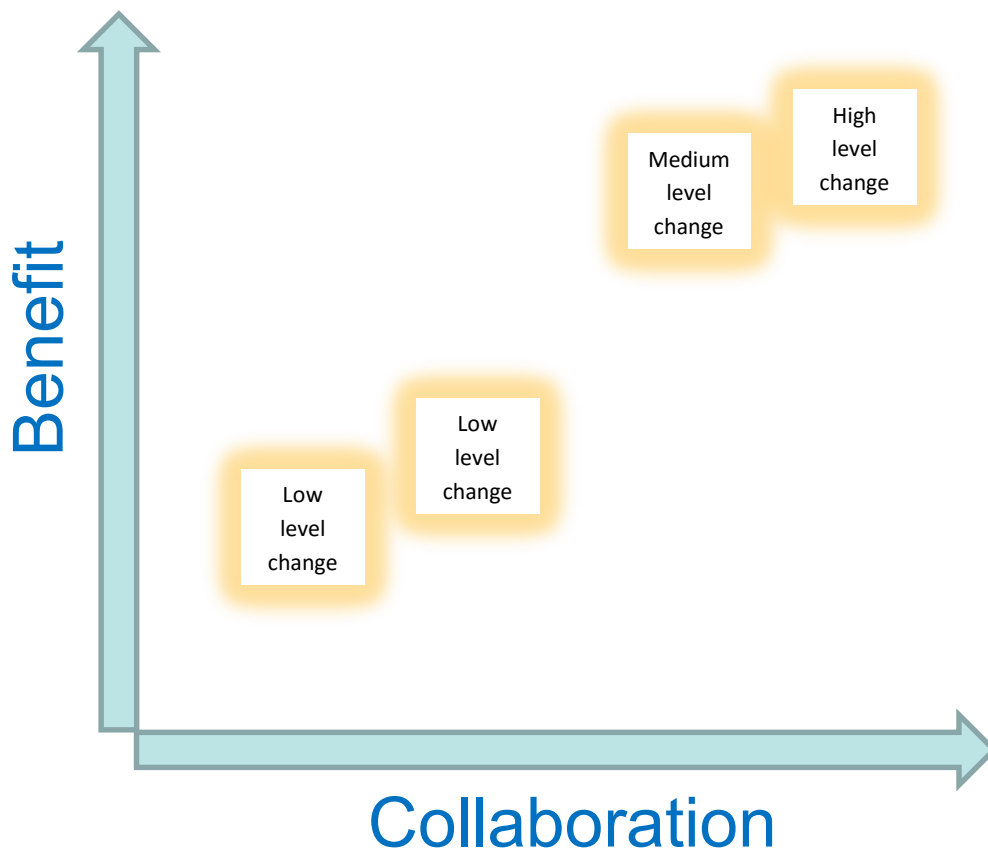
3.3 Summary of Options Analysis

The four packages of options are cumulative in nature although some individual options could be progressed independently. The first package of options builds on some initiatives already taken or at least tried by the councils, and the following packages then build on the first package.

The advantages and disadvantages of the option packages scale up and down depending on the individual options or combination of options. For example, a single RM team administering one unitary plan (the high level change option package) is likely to achieve maximum efficiency and maximise the advantages possible, but it would be the most costly and time consuming package of options to implement. At the other end of the scale, implementing any of the “quick wins” (common forms, common templates, joint processes, shared staff resources) i.e. low level change A, would be relatively simple to achieve but would have relatively small advantages overall. Similarly, having either one RM team or one district RM team seeking to work across a range of separate plans is likely to achieve considerably less advantages than having one team administering one plan.

Based on an overall evaluation of the benefits, i.e. comparison of both advantages and disadvantages, and the degree of collaboration required²⁸, the following figure provides a graphic illustration of the relative comparison between the option packages:

²⁸ This evaluation is based on the inputs in Part A and further work would be required to quantify the costs (quantitative and qualitative) and benefits of the options. This may involve further feasibility analysis and implementation planning.



From the analysis to hand, it would appear likely that there would be limited additional benefits from the high level change option when compared to the medium level change option. Details of how the options may be pursued (in future steps beyond this current study) may further clarify the degree of benefits against the costs.

While the advantages and disadvantages of the various options and packages of options are quite clear, what is less clear at this stage is the way in which the options may be implemented. The “how” question is one which will need to be pursued as part of the next steps.

One situation in which a successful combined plan approach across multiple districts has been undertaken is for the Combined Wairarapa District Plan²⁹. A summary of the approach taken to the development of the Combined Wairarapa District Plan follows:

²⁹ For more information refer to:
[https://www.mfe.govt.nz/sites/default/files/media/RMA/Combined_Plan_Study_Report_Final_20140627%20\(3\).pdf](https://www.mfe.govt.nz/sites/default/files/media/RMA/Combined_Plan_Study_Report_Final_20140627%20(3).pdf)

CASE STUDY: COMBINED WAIRARAPA DISTRICT PLAN

The three Wairarapa District Councils prepared individual first generation district plans through the mid-1990s, which progressively became operative from 1997 through to 2000.

In 2001, the idea of a Combined District Plan was put forward to improve the consistency of planning outcomes for the whole Wairarapa, which as a sub-region has similar planning issues. This drive for consistency, together with many common cross-boundary issues, was a key driver behind the desire for a combined plan.

The most important element behind the decision to prepare a combined plan was the strong will of all three Councils. This political buy in was of particular importance for a combined plan, where different levels of engagement and will could severely limit the effectiveness of the process, and stymie a collaborative initiative. To address this issue, a Combined Planning Committee was formed to drive the preparation of the combined plan. The Committee comprised three representatives from each Council, including the three mayors. The Councillors were also on the relevant Planning Committees of each Council.

Following a process of plan drafting, community engagement, plan refinement, public notification / hearings / appeals, the combined plan was made operative on 25 May 2011.

Lessons learned:

- *Full Buy-in of All Parties is Crucial*
- *Plan the preparation process*
- *Form a representative decision making body*
- *Define leadership in the decision making body*
- *Plan for conflict resolution / consensus building*
- *Respect sense of place*
- *Establish knowledge bases and how gaps are to be filled*
- *Define cost sharing*
- *Build relationships at all levels*
- *Agree on implementation protocols*
- *Size matters*

PART C: NEXT STEPS

The terms of reference for this project states *“This project will be the first in a series of pieces of work. Several reports will be needed to identify preferred options and their associated costs and benefits before settling on an option for change (if any).”*³⁰

The terms of reference goes on to state *“The options would then be used to inform a discussion between the West Coast councils and the Commission about how more efficient and cost effective resource management services for the region could be delivered. Once there is broad agreement about an option or options for further investigation there will be discussions with the West Coast community.”*³¹

The next steps for this project is to determine which preferred option/s, if any, to consider further. To assist the Commission and councils to identify and assess options for further investigation, a set of evaluation criteria has been developed.

4.0 Evaluation Criteria

4.1 Goals for evaluation

The proposed evaluation criteria were informed by two key factors:

- I. Establishment of a baseline to comparatively evaluate the options against.
- II. Identification of the goals for evaluation.

Given the established situation on the West Coast, it is appropriate to evaluate the options against the status quo - the current four councils independently administering their current resource management functions.

Given the brief for the project and the feedback received from stakeholders, the following represent goals for evaluation:

1. The option achieves an improved level of service for the public and applicants compared to the status quo.
2. The option reduces costs for both applicants and the councils when compared to the status quo.

In relation to this goal ‘level of service’ encompasses issues of clarity, transparency, ease of use, accessibility, coordination, and improvement of wellbeing.

In relation to this goal ‘costs’ includes both quantitative and qualitative costs, including efficiency, effectiveness, impediments to growth, and integration.

³⁰ Terms of Reference, paragraph 14.

³¹ Terms of Reference, paragraph 18.

4.2 Evaluation criteria

On the basis of the above goals, the following evaluation criteria have been developed:

To what extent does the option...:

- a) *Change the level of service to applicants and consent holders*
- b) *Change costs for the councils and/or improve cost effectiveness*
- c) *Change costs for applicants/consent holders and/or improve cost effectiveness*
- d) *Change the efficiency of RM services*
- e) *Change the effectiveness of RM services*
- f) *Impact on environmental wellbeing*
- g) *Impact on social wellbeing*
- h) *Impact on cultural wellbeing*
- i) *Impact on economic wellbeing*
- j) *Impact on growth opportunities*
- k) *Impact on managing region wide issues*
- l) *Change the ability to meet the particular needs of local districts*

4.3 Application of criteria

It is proposed that the evaluation criteria would be applied to each option being evaluated, in a matrix format, as set out in Table 2 below:

Table 2: Evaluation matrix

	Better		Neutral		Worse
	5	4	3	2	1
To what extent does the option...:					
a) Change the level of service to applicants and consent holders (clarity, transparency, ease of use, coordination)					
b) Change costs for the councils (monetary and non-monetary e.g. time)					
c) Change costs for applicants/consent holders (monetary and non-monetary e.g. time, economies of scale)					
d) Change the efficiency of RM services (do benefits outweigh costs?)					
e) Change the effectiveness of RM services (e.g. how do the services contribute to achieving the Resource Management Act, capacity of staff)					

f) Impact on environmental wellbeing (short, medium or long term)					
g) Impact on social wellbeing (e.g. resilience, short, medium or long term)					
h) Impact on cultural wellbeing (short, medium or long term)					
i) Impact on economic wellbeing (e.g. economic growth, short, medium or long term)					
j) Impact on growth opportunities (e.g. contribution to employment)					
k) Impact on managing region wide issues (e.g. hazards, coast, landscapes, biodiversity)					
l) Change the ability to meet the particular needs of local districts					

The matrix approach displayed in Table 2 above would enable a basic but easily applied analysis of each option, with scores applied allowing each evaluation to be compared to others. A hypothetical application of the evaluation matrix is contained in **Appendix 6**.

Under this approach the higher the “score” achieved by an option the better option it would be in achieving the goals. However, it may also be appropriate to apply weighting to some of the criteria or to determine that some of the criteria need to score at least neutral (3) for an option to be appropriate. For example, an option that was evaluated to be “worse” (scoring 1 or 2) in relation to any of the four wellbeing’s is unlikely to be appropriate to pursue.

4.4 Future process

This report has not been required to determine a preferred option or group of options and the future process between the councils and the Commission will determine which, if any, options are to be pursued. Future processes may involve feasibility reporting or more detailed implementation analysis to determine a more detailed process for taking any options forward. Such processes may also include opportunities such as a combined committee of councils or a working party to investigate options.

Appendix 1: Terms of Reference



Terms of Reference - Resource Management Act Processes

1. On 9 December 2015, the Local Government Commission (the Commission) met with the chair of the West Coast Regional Council, the chief executives of Buller and Westland district councils, and a representative of the Grey District council.
2. The meeting identified two initiatives from the West Coast councils' *A Commitment to Regional Efficiency* that could result in regional efficiencies:¹
 - A shared Resource Management Act (RMA) planning, consenting and compliance monitoring team for the region
 - A road maintenance centre of excellence.
3. The Commission and the West Coast councils agree that resource management and roading represent areas of existing local government expenditure, where there is commonality across the councils and potential for significant gains to the ratepayers from reviewing how these services are delivered (either in terms of quality or cost effectiveness). For these reasons resource management and roading were selected as areas for further investigation.

Background

4. All parties are committed to greater collaboration and the provision of "good quality local infrastructure and local public services, and to perform regulatory functions in a way that is most cost effective for households and businesses".
5. The West Coast has many unique challenges to face: geographic, demographic and economic. A long, sparsely populated and remote region, which is historically reliant upon extractive industries and dominated by Department of Conservation control of 80% of its land mass. The population base of approximately 33,000 is projected to decline further, along with large-scale providers of employment. For these reasons the West

¹ *A Commitment to Regional Efficiency* was announced by the West Coast Mayoral Forum on 19 October 2015 and subsequently endorsed by the Councils: Westland District (26 November 2015), Grey District (9 November 2015), Buller District (28 October 2015), and West Coast Regional Council (20 October 2015).

Coast is the fifth region to become part of the Government regional economic development programme.

6. The four West Coast councils are committed to remaining financially viable and sustainable. This is demonstrated by the fact they have for some years now actively worked together in the delivery of services.
7. An application for a West Coast unitary council from Anthea Keenan and Peter Salter was formally received by the Commission in August 2015 and is being separately addressed by the Commission. The applicants are seeking, consistent with what is sought by this project, a more united council system that:
 - Unites communities and provides an agreed vision and pragmatic pathway to address issues, such as declining populations and economic challenges and the need to maintain infrastructure and services.
 - Is sustainable and provides greater transparency, collaboration and improved community representation and consultation.
 - Standardises policies, provides administrative efficiencies and removes duplication (especially in relation to governance and management).
 - Remedies what they consider to be poor Council decisions (such as new rating systems and rates increases; spiralling costs and increasing debt).
8. The Minister of Local Government announced reforms to the local government sector on 16 March 2016. These reforms, once enacted, will enable councils to deliver better services for ratepayers. They will create new options for local government to address challenges they face around managing service, infrastructure, assets, resources and finances. They will give greater flexibility to councils to collaborate to deliver services and infrastructure, such as pre-approved council controlled organisation models to deliver transport services (e.g. local road maintenance and other functions).
9. For this next phase of work, the Commission and councils will be entering into a *Relationship Agreement* with a view to assisting the progress of a strategic work programme to improve local government efficiencies.

Project Purpose

10. The purpose of this project is to come to a shared understanding of the challenges and opportunities facing the West Coast region in relation to resource management so that a possible case for change can be developed. Resource management functions include: planning, consenting and compliance monitoring. Change would need to provide a better level of service to ratepayers and reduce costs for both users and councils.
11. The project has a wide scope in that a range of options for creating more efficient and cost effective resource management services for the region would be explored. This is to ensure that all potential options for change can be investigated and considered. Options could include: having an integrated resource management services for the region, a shared Resource Management Act (RMA) planning, consenting and compliance monitoring team for the region; and having an integrated regional Resource Management Plan for the region.
12. Development of options would need to take into account central government initiatives such as the Resource Management Bill currently being progressed and local agency initiatives such as preparing a joint submission on the Resource Management Bill.

13. The project will:

- Describe the current resource management services on the West Coast, in particular any collaboration and alignment of resource management functions across the region.
- Identify the challenges and opportunities to delivery of efficient, aligned, customer-centric and cost effective resource management services across the region in the short, medium and long term.
- Given the challenges and opportunities, develop a range of options for creating more efficient and cost effective resource management services for the region in the short, medium and long term.
- Detail the advantages and disadvantages of the different options, in particular for the ratepayers and businesses of the West Coast.
- Identify evaluation criteria to help in the selection of a preferred option or options for further investigation.

14. This project will be the first in a series of pieces of work. Several reports would be needed to identify preferred options and their associated costs and benefits before settling on an option for change (if any).

Approach

15. This is a joint project, led and funded by the Commission, with the Buller, Grey and Westland District councils, and the West Coast Regional Council.

16. The joint working approach will include:

- Discussions with councillors and relevant staff from each council to better understand their concerns and aspirations for resource management services in the region.
- To better understand the challenges and opportunities for resource management services in the region, discussions with
 - Iwi
 - key stakeholders, including for example, Development West Coast, Department of Conservation, Westland Milk Products, Federated Farmers, Minerals West Coast, , Forest and Bird, , Tourism West Coast
 - key service providers, including for example RMA consultants, tourist operators, Buller Electricity, Westpower.
- A report covering the work listed in paragraph 13 above that is managed by the Commission and supported by staff from the councils as required. West Coast councils and the Commission will agree on the terms of reference and the consultant contracted to do the work. There will also be an opportunity for all parties to review the draft report before it is finalised.
- Regular reporting by the West Coast councils and the Commission to full council meetings.
- Developing joint communications informing the West Coast community that this project is underway, e.g. a joint media release and newspaper articles about the work.

Product /Outcome

17. This phase of the work will result in an independent report, which summarises the existing West Coast councils' resource management systems and processes, the challenges and opportunities in the short, medium and long term and provides a range of options for creating more efficient and cost effective resource management services for the region.
18. The options would then be used to inform a discussion between the West Coast councils and the Commission about how more efficient and cost effective resource management services for the region could be delivered. Once there is broad agreement about an option or options for further investigation there will be discussions with the West Coast community.

Timeline

19. Discussions and analysis work will be carried out between April and August 2016 before the Local Authority elections.
20. This project will be conducted at the same time the Commission is carrying out public consultation on the delivery of local government services on the West Coast as a result of the reorganisation application it has received. The aim of the public consultation is to seek the views of the community on the issues that are important to them and the local government outcomes they want to see.

Appendix 2: Legislative Framework

Key legislative provisions driving RM services on the West Coast:

Resource Management Act 1991

Part 2 Purpose and principles

5 Purpose

(1) The purpose of this Act is to promote the sustainable management of natural and physical resources.

(2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural well-being and for their health and safety while—

- (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and
- (b) safeguarding the life-supporting capacity of air, water, soil, and ecosystems; and
- (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment.

6 Matters of national importance

In achieving the purpose of this Act, all persons exercising functions and powers under it, in relation to managing the use, development, and protection of natural and physical resources, shall recognise and provide for the following matters of national importance:

- (a) the preservation of the natural character of the coastal environment (including the coastal marine area), wetlands, and lakes and rivers and their margins, and the protection of them from inappropriate subdivision, use, and development:
- (b) the protection of outstanding natural features and landscapes from inappropriate subdivision, use, and development:
- (c) the protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna:
- (d) the maintenance and enhancement of public access to and along the coastal marine area, lakes, and rivers:
- (e) the relationship of Maori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga:
- (f) the protection of historic heritage from inappropriate subdivision, use, and development:
- (g) the protection of protected customary rights.

7 Other matters

In achieving the purpose of this Act, all persons exercising functions and powers under it, in relation to managing the use, development, and protection of natural and physical resources, shall have particular regard to—

- (a) kaitiakitanga:
- (aa) the ethic of stewardship:

- (b) the efficient use and development of natural and physical resources:
- (ba) the efficiency of the end use of energy:
- (c) the maintenance and enhancement of amenity values:
- (d) intrinsic values of ecosystems:
- (e) [Repealed]
- (f) maintenance and enhancement of the quality of the environment:
- (g) any finite characteristics of natural and physical resources:
- (h) the protection of the habitat of trout and salmon:
- (i) the effects of climate change:
- (j) the benefits to be derived from the use and development of renewable energy.

8 Treaty of Waitangi

In achieving the purpose of this Act, all persons exercising functions and powers under it, in relation to managing the use, development, and protection of natural and physical resources, shall take into account the principles of the Treaty of Waitangi (Te Tiriti o Waitangi).

Part 4 Functions, powers, and duties of central and local government

30 Functions of regional councils under this Act

(1) Every regional council shall have the following functions for the purpose of giving effect to this Act in its region:

- (a) the establishment, implementation, and review of objectives, policies, and methods to achieve integrated management of the natural and physical resources of the region:
- (b) the preparation of objectives and policies in relation to any actual or potential effects of the use, development, or protection of land which are of regional significance:
- (c) the control of the use of land for the purpose of—
 - (i) soil conservation:
 - (ii) the maintenance and enhancement of the quality of water in water bodies and coastal water:
 - (iii) the maintenance of the quantity of water in water bodies and coastal water:
 - (iiia) the maintenance and enhancement of ecosystems in water bodies and coastal water:
 - (iv) the avoidance or mitigation of natural hazards:
 - (v) the prevention or mitigation of any adverse effects of the storage, use, disposal, or transportation of hazardous substances:
- (ca) the investigation of land for the purposes of identifying and monitoring contaminated land:
- (d) in respect of any coastal marine area in the region, the control (in conjunction with the Minister of Conservation) of—
 - (i) land and associated natural and physical resources:

- (ii) the occupation of space in, and the extraction of sand, shingle, shell, or other natural material from, the coastal marine area, to the extent that it is within the common marine and coastal area:
 - (iii) the taking, use, damming, and diversion of water:
 - (iv) discharges of contaminants into or onto land, air, or water and discharges of water into water:
 - (iva) the dumping and incineration of waste or other matter and the dumping of ships, aircraft, and offshore installations:
 - (v) any actual or potential effects of the use, development, or protection of land, including the avoidance or mitigation of natural hazards and the prevention or mitigation of any adverse effects of the storage, use, disposal, or transportation of hazardous substances:
 - (vi) the emission of noise and the mitigation of the effects of noise:
 - (vii) activities in relation to the surface of water:
- (e) the control of the taking, use, damming, and diversion of water, and the control of the quantity, level, and flow of water in any water body, including—
- (i) the setting of any maximum or minimum levels or flows of water:
 - (ii) the control of the range, or rate of change, of levels or flows of water:
 - (iii) the control of the taking or use of geothermal energy:
- (f) the control of discharges of contaminants into or onto land, air, or water and discharges of water into water:
- (fa) if appropriate, the establishment of rules in a regional plan to allocate any of the following:
- (i) the taking or use of water (other than open coastal water):
 - (ii) the taking or use of heat or energy from water (other than open coastal water):
 - (iii) the taking or use of heat or energy from the material surrounding geothermal water:
 - (iv) the capacity of air or water to assimilate a discharge of a contaminant:
- (fb) if appropriate, and in conjunction with the Minister of Conservation,—
- (i) the establishment of rules in a regional coastal plan to allocate the taking or use of heat or energy from open coastal water:
 - (ii) the establishment of a rule in a regional coastal plan to allocate space in a coastal marine area under Part 7A:
- (g) in relation to any bed of a water body, the control of the introduction or planting of any plant in, on, or under that land, for the purpose of—
- (i) soil conservation:
 - (ii) the maintenance and enhancement of the quality of water in that water body:
 - (iii) the maintenance of the quantity of water in that water body:
 - (iv) the avoidance or mitigation of natural hazards:

(ga) the establishment, implementation, and review of objectives, policies, and methods for maintaining indigenous biological diversity:

(gb) the strategic integration of infrastructure with land use through objectives, policies, and methods:

(h) any other functions specified in this Act.

(2) A regional council and the Minister of Conservation must not perform the functions specified in subsection (1)(d)(i), (ii), and (vii) to control the taking, allocation or enhancement of fisheries resources for the purpose of managing fishing or fisheries resources controlled under the Fisheries Act 1996.

(3) However, a regional council and the Minister of Conservation may perform the functions specified in subsection (1)(d) to control aquaculture activities for the purpose of avoiding, remedying, or mitigating the effects of aquaculture activities on fishing and fisheries resources.

(4) A rule to allocate a natural resource established by a regional council in a plan under subsection (1)(fa) or (fb) may allocate the resource in any way, subject to the following:

(a) the rule may not, during the term of an existing resource consent, allocate the amount of a resource that has already been allocated to the consent; and

(b) nothing in paragraph (a) affects section 68(7); and

(c) the rule may allocate the resource in anticipation of the expiry of existing consents; and

(d) in allocating the resource in anticipation of the expiry of existing consents, the rule may—

(i) allocate all of the resource used for an activity to the same type of activity; or

(ii) allocate some of the resource used for an activity to the same type of activity and the rest of the resource to any other type of activity or no type of activity; and

(e) the rule may allocate the resource among competing types of activities; and

(f) the rule may allocate water, or heat or energy from water, as long as the allocation does not affect the activities authorised by section 14(3)(b) to (e).

31 Functions of territorial authorities under this Act

(1) Every territorial authority shall have the following functions for the purpose of giving effect to this Act in its district:

(a) the establishment, implementation, and review of objectives, policies, and methods to achieve integrated management of the effects of the use, development, or protection of land and associated natural and physical resources of the district:

(b) the control of any actual or potential effects of the use, development, or protection of land, including for the purpose of—

(i) the avoidance or mitigation of natural hazards; and

(ii) the prevention or mitigation of any adverse effects of the storage, use, disposal, or transportation of hazardous substances; and

(iia) the prevention or mitigation of any adverse effects of the development, subdivision, or use of contaminated land:

(iii) the maintenance of indigenous biological diversity:

(c) [Repealed]

(d) the control of the emission of noise and the mitigation of the effects of noise:

(e) the control of any actual or potential effects of activities in relation to the surface of water in rivers and lakes:

(f) any other functions specified in this Act.

(2) The methods used to carry out any functions under subsection (1) may include the control of subdivision.

Part 5 Standards, policy statements, and plans

59 Purpose of regional policy statements

The purpose of a regional policy statement is to achieve the purpose of the Act by providing an overview of the resource management issues of the region and policies and methods to achieve integrated management of the natural and physical resources of the whole region.

61 Matters to be considered by regional council (policy statements)

(1) A regional council must prepare and change its regional policy statement in accordance with—

(a) its functions under section 30; and

(b) the provisions of Part 2; and

(c) its obligation (if any) to prepare an evaluation report in accordance with section 32; and

(d) its obligation to have particular regard to an evaluation report prepared in accordance with section 32; and

(e) any regulations.

(2) In addition to the requirements of section 62(2), when preparing or changing a regional policy statement, the regional council shall have regard to—

(a) any—

(i) management plans and strategies prepared under other Acts; and

(ii) [Repealed]

(iia) relevant entry on the New Zealand Heritage List/Rārangī Kōrero required by the Heritage New Zealand Pouhere Taonga Act 2014; and

(iii) regulations relating to ensuring sustainability, or the conservation, management, or sustainability of fisheries resources (including regulations or bylaws relating to taiapure, mahinga mataitai, or other non-commercial Maori customary fishing); and

(iv) [Repealed]

to the extent that their content has a bearing on resource management issues of the region; and

(b) the extent to which the regional policy statement needs to be consistent with the policy statements and plans of adjacent regional councils; and

(c) the extent to which the regional policy statement needs to be consistent with regulations made under the Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012; and

(2A) When a regional council is preparing or changing a regional policy statement, it must deal with the following documents, if they are lodged with the council, in the manner specified, to the extent that their content has a bearing on the resource management issues of the region:

- (a) the council must take into account any relevant planning document recognised by an iwi authority; and
- (b) in relation to a planning document prepared by a customary marine title group under section 85 of the Marine and Coastal Area (Takutai Moana) Act 2011, the council must, in accordance with section 93 of that Act,—
 - (i) recognise and provide for the matters in that document, to the extent that they relate to the relevant customary marine title area; and
 - (ii) take into account the matters in that document, to the extent that they relate to a part of the common marine and coastal area outside the customary marine title area of the relevant group.

(3) In preparing or changing any regional policy statement, a regional council must not have regard to trade competition or the effects of trade competition.

62 Contents of regional policy statements

(1) A regional policy statement must state—

- (a) the significant resource management issues for the region; and
- (b) the resource management issues of significance to iwi authorities in the region; and
- (c) the objectives sought to be achieved by the statement; and
- (d) the policies for those issues and objectives and an explanation of those policies; and
- (e) the methods (excluding rules) used, or to be used, to implement the policies; and
- (f) the principal reasons for adopting the objectives, policies, and methods of implementation set out in the statement; and
- (g) the environmental results anticipated from implementation of those policies and methods; and
- (h) the processes to be used to deal with issues that cross local authority boundaries, and issues between territorial authorities or between regions; and
- (i) the local authority responsible in the whole or any part of the region for specifying the objectives, policies, and methods for the control of the use of land—
 - (i) to avoid or mitigate natural hazards or any group of hazards; and
 - (ii) to prevent or mitigate the adverse effects of the storage, use, disposal, or transportation of hazardous substances; and
 - (iii) to maintain indigenous biological diversity; and
- (j) the procedures used to monitor the efficiency and effectiveness of the policies or methods contained in the statement; and
- (k) any other information required for the purpose of the regional council's functions, powers, and duties under this Act.

(2) If no responsibilities are specified in the regional policy statement for functions described in subsection (1)(i)(i) or (ii), the regional council retains primary responsibility for the function in subsection (1)(i)(i) and the territorial authorities of the region retain primary responsibility for the function in subsection (1)(i)(ii).

(3) A regional policy statement must not be inconsistent with any water conservation order and must give effect to a national policy statement or New Zealand coastal policy statement.

63 Purpose of regional plans

(1) The purpose of the preparation, implementation, and administration of regional plans is to assist a regional council to carry out any of its functions in order to achieve the purpose of this Act.

(2) Without limiting subsection (1), the purpose of the preparation, implementation, and administration of regional coastal plans is to assist a regional council, in conjunction with the Minister of Conservation, to achieve the purpose of this Act in relation to the coastal marine area of that region.

66 Matters to be considered by regional council (plans)

(1) A regional council must prepare and change any regional plan in accordance with—

- (a) its functions under section 30; and
- (b) the provisions of Part 2; and
- (c) a direction given under section 25A(1); and
- (d) its obligation (if any) to prepare an evaluation report in accordance with section 32; and
- (e) its obligation to have particular regard to an evaluation report prepared in accordance with section 32; and
- (f) any regulations.

(2) In addition to the requirements of section 67(3) and (4), when preparing or changing any regional plan, the regional council shall have regard to—

- (a) any proposed regional policy statement in respect of the region; and
- (b) the Crown's interests in the coastal marine area; and
- (c) any—
 - (i) management plans and strategies prepared under other Acts; and
 - (ii) [Repealed]
 - (iia) relevant entry on the New Zealand Heritage List/Rārangī Kōrero required by the Heritage New Zealand Pouhere Taonga Act 2014; and
 - (iii) regulations relating to ensuring sustainability, or the conservation, management, or sustainability of fisheries resources (including regulations or bylaws relating to taiapure, mahinga mataitai, or other non-commercial Maori customary fishing); and
 - (iv) [Repealed]

to the extent that their content has a bearing on resource management issues of the region; and

(d) the extent to which the regional plan needs to be consistent with the regional policy statements and plans, or proposed regional policy statements and proposed plans, of adjacent regional councils; and

(e) to the extent to which the regional plan needs to be consistent with regulations made under the Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012; and

(2A) When a regional council is preparing or changing a regional plan, it must deal with the following documents, if they are lodged with the council, in the manner specified, to the extent that their content has a bearing on the resource management issues of the region:

- (a) the council must take into account any relevant planning document recognised by an iwi authority; and

(b) in relation to a planning document prepared by a customary marine title group under section 85 of the Marine and Coastal Area (Takutai Moana) Act 2011, the council must, in accordance with section 93 of that Act,—

(i) recognise and provide for the matters in that document, to the extent that they relate to the relevant customary marine title area; and

(ii) take into account the matters in that document, to the extent that they relate to a part of the common marine and coastal area outside the customary marine title area of the relevant group.

(3) In preparing or changing any regional plan, a regional council must not have regard to trade competition or the effects of trade competition.

67 Contents of regional plans

(1) A regional plan must state—

(a) the objectives for the region; and

(b) the policies to implement the objectives; and

(c) the rules (if any) to implement the policies.

(2) A regional plan may state—

(a) the issues that the plan seeks to address; and

(b) the methods, other than rules, for implementing the policies for the region; and

(c) the principal reasons for adopting the policies and methods; and

(d) the environmental results expected from the policies and methods; and

(e) the procedures for monitoring the efficiency and effectiveness of the policies and methods; and

(f) the processes for dealing with issues—

(i) that cross local authority boundaries; or

(ii) that arise between territorial authorities; or

(iii) that arise between regions; and

(g) the information to be included with an application for a resource consent; and

(h) any other information required for the purpose of the regional council's functions, powers, and duties under this Act.

(3) A regional plan must give effect to—

(a) any national policy statement; and

(b) any New Zealand coastal policy statement; and

(c) any regional policy statement.

(4) A regional plan must not be inconsistent with—

(a) a water conservation order; or

(b) any other regional plan for the region; or

(c) [Repealed]

(5) A regional plan must record how a regional council has allocated a natural resource under section 30(1)(fa) or (fb) and (4), if the council has done so.

(6) A regional plan may incorporate material by reference under Part 3 of Schedule 1.

72 Purpose of district plans

The purpose of the preparation, implementation, and administration of district plans is to assist territorial authorities to carry out their functions in order to achieve the purpose of this Act.

74 Matters to be considered by territorial authority

(1) A territorial authority must prepare and change its district plan in accordance with—

- (a) its functions under section 31; and
- (b) the provisions of Part 2; and
- (c) a direction given under section 25A(2); and
- (d) its obligation (if any) to prepare an evaluation report in accordance with section 32; and
- (e) its obligation to have particular regard to an evaluation report prepared in accordance with section 32; and
- (f) any regulations.

(2) In addition to the requirements of section 75(3) and (4), when preparing or changing a district plan, a territorial authority shall have regard to—

- (a) any—
 - (i) proposed regional policy statement; or
 - (ii) proposed regional plan of its region in regard to any matter of regional significance or for which the regional council has primary responsibility under Part 4; and
- (b) any—
 - (i) management plans and strategies prepared under other Acts; and
 - (ii) [Repealed]
 - (iia) relevant entry on the New Zealand Heritage List/Rārangi Kōrero required by the Heritage New Zealand Pouhere Taonga Act 2014; and
 - (iii) regulations relating to ensuring sustainability, or the conservation, management, or sustainability of fisheries resources (including regulations or bylaws relating to taia pure, mahinga mataitai, or other non-commercial Maori customary fishing),—
to the extent that their content has a bearing on resource management issues of the district;
and
- (c) the extent to which the district plan needs to be consistent with the plans or proposed plans of adjacent territorial authorities.

(2A) A territorial authority, when preparing or changing a district plan, must take into account any relevant planning document recognised by an iwi authority and lodged with the territorial authority, to the extent that its content has a bearing on the resource management issues of the district.

(3) In preparing or changing any district plan, a territorial authority must not have regard to trade competition or the effects of trade competition.

75 Contents of district plans

(1) A district plan must state—

- (a) the objectives for the district; and
- (b) the policies to implement the objectives; and
- (c) the rules (if any) to implement the policies.

(2) A district plan may state—

- (a) the significant resource management issues for the district; and
- (b) the methods, other than rules, for implementing the policies for the district; and
- (c) the principal reasons for adopting the policies and methods; and
- (d) the environmental results expected from the policies and methods; and
- (e) the procedures for monitoring the efficiency and effectiveness of the policies and methods; and
- (f) the processes for dealing with issues that cross territorial authority boundaries; and
- (g) the information to be included with an application for a resource consent; and
- (h) any other information required for the purpose of the territorial authority's functions, powers, and duties under this Act.

(3) A district plan must give effect to—

- (a) any national policy statement; and
- (b) any New Zealand coastal policy statement; and
- (c) any regional policy statement.

(4) A district plan must not be inconsistent with—

- (a) a water conservation order; or
- (b) a regional plan for any matter specified in section 30(1).

(5) A district plan may incorporate material by reference under Part 3 of Schedule 1.

Part 6 Resource consents

Part 12 Declarations, enforcement, and ancillary powers

Conservation Act 1987

Part 2 Establishment and functions of Department of Conservation

6 Functions of Department

The functions of the Department are to administer this Act and the enactments specified in Schedule 1, and, subject to this Act and those enactments and to the directions (if any) of the Minister,—

- (a) to manage for conservation purposes, all land, and all other natural and historic resources, for the time being held under this Act, and all other land and natural and historic resources whose owner agrees with the Minister that they should be managed by the Department:

- (ab) to preserve so far as is practicable all indigenous freshwater fisheries, and protect recreational freshwater fisheries and freshwater fish habitats:
- (b) to advocate the conservation of natural and historic resources generally:
- (c) to promote the benefits to present and future generations of—
 - (i) the conservation of natural and historic resources generally and the natural and historic resources of New Zealand in particular; and
 - (ii) the conservation of the natural and historic resources of New Zealand’s sub-antarctic islands and, consistently with all relevant international agreements, of the Ross Dependency and Antarctica generally; and
 - (iii) international co-operation on matters relating to conservation:
- (d) to prepare, provide, disseminate, promote, and publicise educational and promotional material relating to conservation:
- (e) to the extent that the use of any natural or historic resource for recreation or tourism is not inconsistent with its conservation, to foster the use of natural and historic resources for recreation, and to allow their use for tourism:
- (f) to advise the Minister on matters relating to any of those functions or to conservation generally:
- (g) every other function conferred on it by any other enactment.

Part 3B Concessions

170 Application

- (1) This Part applies to every conservation area.
- (2) Except as provided in subsection (3) or subsection (4), no activity shall be carried out in a conservation area unless authorised by a concession.
- (3) A concession is not required in respect of—
 - (a) any mining activity authorised under the Crown Minerals Act 1991 (including the transitional provisions of that Act); or
 - (b) any activity that is otherwise authorised by or under this Act or any Act specified in Schedule 1; or
 - (c) any action or event necessary for the purposes of saving or protecting life or health, or preventing serious damage to property or avoiding an actual or likely adverse effect on the environment; or
 - (d) any activity that is carried out by the Minister or Director-General in the exercise of his or her functions, duties, or powers under this Act or any other Act.
- (4) An individual or organised group undertaking any recreational activity, whether for the benefit of the individual or members (individually or collectively) of the group, does not require a concession if the individual or group is undertaking the activity without any specific gain or reward for that activity, whether pecuniary or otherwise.
- (5) A group of the kind to which subsection (4) applies may impose on its members a reasonable charge in order to recover the reasonable expenses in organising the recreational activity.

(6) Subsection (3)(b) shall not apply to any sports fishing guide or game hunting guide who conducts any activity in a conservation area.

(7) This Part is subject to Part 2 of the Forests (West Coast Accord) Act 2000, in relation to land that is a conservation area as a result of a declaration under section 8(1) of that Act.

17P Relationship with the Resource Management Act 1991

(1) Except as provided in subsection (2), this Part does not relieve any person from any obligation to obtain a resource consent under the Resource Management Act 1991.

(2) Section 11 and Part 10 of the Resource Management Act 1991 do not apply to any lease granted by the Minister.

Crown Minerals Act 1991

1A Purpose

(1) The purpose of this Act is to promote prospecting for, exploration for, and mining of Crown owned minerals for the benefit of New Zealand.

(2) To this end, this Act provides for—

- (a) the efficient allocation of rights to prospect for, explore for, and mine Crown owned minerals; and
- (b) the effective management and regulation of the exercise of those rights; and
- (c) the carrying out, in accordance with good industry practice, of activities in respect of those rights; and
- (d) a fair financial return to the Crown for its minerals.

Appendix 3: Current Processes and Systems

Resource Management Team Service Description

All of the RM teams at the Councils perform the following core functions:

- RM Services: RM policy, resource consents, compliance monitoring.
- Input into Land Information Memoranda.
- Assistance with general property information and public enquiries.
- Input to a range of non-RM projects across the organisation.

In addition some of the teams contribute to other wider Council roles and responsibilities e.g. input into licensing applications under other legislation, development and review of bylaws and non-RM policies.

Current West Coast Plans

Table 3: Summary of Current West Coast Plans

	Grey District Plan	Buller District Plan	Westland District Plan	West Coast Regional Plan
Structure	Identifies District wide issues, objectives and policies, explanation and reasons, methods of implementation and environmental results,	Identifies Significant Resource Management Issues, Objectives and Policies, methods of implementation, explanation and reasons, intended	The Plan identifies key objectives of the Plan and the policies to achieve those objectives.	Identifies objectives, policies and methods. Plan sets out rules for specific activities.

	Grey District Plan	Buller District Plan	Westland District Plan	West Coast Regional Plan
	<p>anticipated and monitoring.</p> <p>Identifies different ‘environmental areas’: residential, township, rural residential, rural, commercial and industrial.</p> <p>Rules are contained in separate chapters related to the environmental areas or district wide matters such as signs, utilities, heritage, subdivision etc.</p> <p>A full set of planning maps is provided as well as asset and rating information through IntraMaps.</p>	<p>environmental outcomes and monitoring.</p> <p>Identifies character areas and zones i.e. Urban Character Area, which is divided into Residential Zone and Scenically Sensitive Residential Zone.</p> <p>Each character area has specific rules. Issues, objectives and policies are general, rather than being linked to the character areas.</p> <p>District Wide Rules are grouped in a separate chapter: subdivision, access, parking, recession plane, signage, noise etc.</p> <p>Planning maps are available in hardcopy. They are also available online via WestMaps which is accessed from the West Coast Regional Council’s website.</p>	<p>The District is then divided into “Policy Units” or zones, which outline specific performance standards in set communities within Westland.</p> <p>There are also District Wide and subdivision rules that are contained in separate chapters.</p> <p>A full set of planning maps is provided.</p>	

	Grey District Plan	Buller District Plan	Westland District Plan	West Coast Regional Plan
Content	<p>Effects based.</p> <p>There is mining in the District but its activity status is determined by which rules it infringes.</p> <p>It is noted that the Plan does not identify ONL's and ONF's within public conservation lands.</p> <p>Furthermore, within 2 years of the Plan becoming operative, it was intended to identify areas of significant indigenous vegetation and habitats of flora and fauna. It would appear that this work is yet to be completed but the Plan does contain rules that manage indigenous vegetation clearance.</p>	<p>Activity based.</p> <p>The Plan addresses the usual matters of concern to district councils. There are specific rules relating to mining in the Rural Zone (5.3.2.4.3) as a RD Activity.</p> <p>It is the only Plan that has a Port Zone.</p> <p>It does not appear that the Council has identified SNA's but the Plan does contain rules that manage indigenous vegetation clearance.</p>	<p>Activity based.</p> <p>The Plan addresses the usual matters of concern to district councils. There are specific rules relating to mining in the Rural Zone (5.6.2.2 D) as a RD Activity.</p> <p>It does not appear that the Council has identified SNA's but the Plan does contain rules that manage indigenous vegetation clearance.</p> <p>The Plan identifies ONL's in the text but these are not shown on the planning maps. The majority are lakes such as lanthe and Lake Moeraki.</p>	<p>Activity based.</p> <p>The Plan manages activities such as the use, diversion, damming and taking of water, earthworks and discharges as well as the protection of waterbodies and wetlands as outstanding natural features as well as significant habitats.</p> <p>The Plan appears to be fairly permissive.</p>
Status	<p>Operative.</p> <p>No plan review timetabled.</p>	<p>Operative.</p> <p>Rolling review in progress.</p>	<p>Operative.</p> <p>Starting plan review process.</p>	<p>Regional Policy Statement: Notified March 2015</p> <p>Regional Coastal Plan: Operative</p>

Grey District Plan	Buller District Plan	Westland District Plan	West Coast Regional Plan
			<p>Proposed Coastal Plan: Notified early 2016.</p> <p>Regional Air Quality Plan: Operative.</p> <p>Land and Water Plan: Operative.</p>

Table 4: Summary of Current West Coast Plan Contents

	Grey District Plan	Buller District Plan	Westland District Plan	West Coast Regional Plan
Date the Plan became operative	<p>2005</p> <p>Amended 2007</p> <p>PC9: give effect to NPS on Electricity Transmission was given effect to 2015</p>	<p>2000</p> <p>Amended in 2004, 2009, 2011</p>	<p>2002</p>	<p>Regional Coastal Plan: 2001</p> <p>Regional Air Quality Plan: 2001, 2010, 2011</p> <p>Land and Water Plan (replaces the Water Management, Land and Riverbed and Discharge to Land Plans): 2014</p>
Plan Review	<p>Not proposed at current time.</p> <p>A Monitoring Review has been carried out, the report on</p>	<p>Rolling review – currently working on proposed District Plan Changes 133 – 145.</p>	<p>A rolling review was commenced in 2009 via an Issues and Options paper which elicited community feedback.</p>	<p>The Regional Council has undertaken a full review of the Regional Coastal Plan 2001, and released its Proposed Regional</p>

	Grey District Plan	Buller District Plan	Westland District Plan	West Coast Regional Plan
	findings were released on March 2010.	<p>The Proposal relates to Parts 1-3 of the BDP which contain introductory material and Part 4 which contains the Significant Resource Management Issues, Objectives and Policies for the district. It also addresses Rules 6.2.5., 6.2.6., 6.4.2.2., 6.4.2.4 and 6.4.2.5 which relate to electricity utilities.</p> <p>Plan Change 133 proposes to replace existing Parts 1-3 with proposed Part 1. Plan Changes 134-144 propose revisions to existing Part 4, as per proposed Part 2. Plan Change 145 proposes to replace the existing rules relating to electricity utilities.</p>	<p>Elected Members have set and subsequently revised the work programme for the review.</p> <p>To date one plan change has been notified as part of the review - Plan Change 7 (Fault Rupture Avoidance Zone), which is currently under appeal to the Environment Court.</p> <p>Options for continuing with a rolling review or moving to an integrated, concentrated review will be discussed with the new Council after the October 2016 elections.</p>	Coastal Plan (RCP) 2016 for public submissions. Submissions on the draft Coastal Plan closed on the 21st of March 2016.
Structure of the Plan	<p>Full sets of planning maps are available.</p> <p>The Council also uses IntraMaps (GIS Property Mapping), which detail assets and rates information for each property in the District as well as providing a</p>	<p>Planning Maps (<i>They are not the full Planning Maps and do not include information about historic places, buildings or structures, notable trees, hazard areas, designations or other special features which are included in the full Planning</i></p>	<p>Full set of planning maps is provided.</p> <p>A VISION FOR WESTLAND</p> <p>PART 1 - A resource management strategy for Westland</p>	<p><u>Land and Water Plan</u></p> <p>1 - Introduction and Poutini Ngai Tahu Perspective</p> <p>2 - Natural and Human Resource Use Values Objectives, Policies and Methods</p>

	Grey District Plan	Buller District Plan	Westland District Plan	West Coast Regional Plan
	link to the relevant planning map.	<i>Maps. If you require this information for a specific property please contact the Council office.)</i>	1.1 - Introduction to the Plan	3 - Land, Lake, Riverbed and Wetlands Objectives, Policies and Methods
	1 – Scope and legislative framework of the plan	Chapter list:	1.2 - Structure of the District Plan	4 - Water objectives, Policies and Methods
	2 - How to read and use the plan	District Plan	1.3 The Management Environment	5 - Discharge Objectives, Policies and Methods
	3 - Utilities	Part 1 – Introduction to the District Plan	Part 2 – Implementation and procedure	6 - Introduction to the Rules, Summary of Rules and Advice notes for Rules
	4 - Landscape	Part 2 – Procedure and Implementation	2.1 - The Council's Functions and Responsibilities	7 - Rules for Activities on Land
	5 - Significant indigenous vegetation and significant habitats of indigenous fauna	Part 3 – The Management Environment	2.2 - Duty to Comply	8 - Rules for Lake and Riverbed Activities
	6 - Waterways and margins	Part 4 – Significant Resource Management Issues, Objectives and Policies	2.3 - Applying for a Resource Consent	9 - Rules for Takes, Uses, and Diversions of Water
	7 - The coastal environment	Part 5 – Character Area and Zone Rules	2.4 - Designations and Heritage Orders	10 - Discharge to Water Rules
	8 - Signs	Part 5.1. – Introduction	2.5 - Plan Changes and District Plan Review	11 - Discharge to Land Rules
	9 - Natural hazards	Part 5.2. – Urban Character Area	2.6 - Issues Crossing Territorial Boundaries	12 - Information Requirements, Financial Contributions,
	10 - Tangata whenua			
	11 - Hazardous substances			
	12 - Transport			
	13 - Subdivision			

	Grey District Plan	Buller District Plan	Westland District Plan	West Coast Regional Plan
	14 - Heritage	Part 5.2.2. – Residential Zone	PART 3 - Key resource management issues and objectives	Monitoring, Review and Glossary
	15 - Financial contributions	Part 5.2.3. – Scenically Sensitive Residential Zone	3.1 - Explanation	13 - Schedules 1-3
	16 - Residential environmental area rules	Part 5.2.4. – Commercial Zone	3.2 - Sustainable Communities	14 - Schedules 4-17
	17 - Township environment rules	Part 5.2.5. – Scenically Sensitive Commercial Zone	3.3 - Image of the District	<u>Regional Coastal Plan</u>
	18 - Rural residential environment rules	Part 5.2.6. – Industrial Zone)	3.4 - Infrastructure and Services	1 – Introduction
	19 - Rural environment rules	Part 5.2.7. – Port Zone	3.5 - Maori Perspective	2 – Legislative Framework
	20 - Commercial and industrial environmental areas rules	Part 5.3. – Rural Character Area	3.6 - Mineral Resources	3 – West Coast Coastal Description
	21 - Utilities rules	Part 5.3.2. – Rural Zone	3.7 - Natural Environments	4 – Poutini Ngai Tahu Values
	22 - Signs rules	Part 5.3.3. – Rural Airport Zone	3.8 - The Land Resource	5 – Coastal Management
	23 - Hazardous substances rules	Part 5.3.4. – Cement Production Zone	3.9 - The Built Resource	6 – Cross Boundary Issues
	24 - Transportation rules	Part 5.4. – Paparoa Character Area	3.10 - Landscape	7 – Public Access and Occupation of Space
	25 - Subdivision rules	Part 5.5. – Natural Environments Character Area	3.11 - Water Resources	8 – Structures
	26 - Heritage rules		3.12 - The Coastal Environment	9 –Alteration of Foreshore and Seabed
			3.13 - Natural Hazards	10 – Discharges

	Grey District Plan	Buller District Plan	Westland District Plan	West Coast Regional Plan
	27 - Application procedure	Part 6 – Infrastructure, Services and Other Activities District Wide	PART 4 POLICIES, METHODS, OUTCOMES AND MONITORING	11 – Taking, Use, Damming or Diversion
	28 - Recession planes		4.1 Explanation	12 – Noise
	29 - Aerodrome flight path protection area	Part 7 – District Wide Rules	4.2 Settlement Character	13 – Exotic Plants
	30 - Schedule of designations	Part 8 – Financial Contributions	4.3 Location of Settlements	14 – Natural Hazards
	31 - Nohoanga	Part 9 – Criteria for Assessment of Discretionary Activities	4.4 Amenity	15 – Information Requirements
	32 - Outline development plan for Kaiata Park	Part 10 – Definitions	4.5 Heritage	16 – Financial Contributions
	33 - Definitions	Part 11 – Schedule of Designated Lands	4.6 Infrastructure and Servicing	17 –Monitoring and Review
		Part 12 – Roading Hierarchy	4.7 Land and Soil Quality	Schedules
		Part 13 – Information to be Included in Applications for Resource Consent	4.8 Landscape	Glossary
		Part 14 – Schedule of Historic Buildings and Sites	4.9 Natural Habitats and Ecosystems	<u>Regional Air Quality Plan</u>
		Part 15 – Schedule of Notable Trees	4.10 The Coast	Foreword
			4.11 Water Quality	Chapter 1 – Introductions
			4.12 Activities on the Surface of Lakes and Rivers	Chapter 2 – Statutory Framework
				Chapter 3 – Management Approach

Grey District Plan	Buller District Plan	Westland District Plan	West Coast Regional Plan
	Part 16 – Statutory Acknowledgments and Nohoanga Entitlements	4.13 Mineral Resources 4.14 Natural Hazards 4.15 Monitoring PART 5 POLICY UNITS 5.1 Explanation 5.2 Hokitika Policy Unit 5.3 Small Settlement Policy Unit 5.4 Tourist Settlement Policy Unit 5.4B Franz Josef Developments Outline Development Plan 5.4A Franz Alpine Resort, Stony Creek 5.5 Coastal Settlement Policy Unit 5.6 Rural Policy Unit	Chapter 4 – Poutini Ngai Tahu Perspective Chapter 5 – Information on Air Quality Chapter 6 – Odour Chapter 7 –Dust Chapter 8 – Products of Combustion Chapter 9 – Global Issues Chapter 10 – Regional Rules Chapter 11 – Resource Consent Procedures Chapter 12 – Information Requirements Chapter 13 – Cross Boundary Issues Chapter 14 – Financial Contributions

Grey District Plan	Buller District Plan	Westland District Plan	West Coast Regional Plan
		<p>5.7 Waiho River Severe Flood Hazard Policy Unit</p> <p>PART 6 OTHER ACTIVITIES IN ALL ZONES</p> <p>6.1 Explanation</p> <p>6.2 Permitted Activities</p> <p>6.3 Controlled Activities</p> <p>6.4 Restricted Discretionary Activities</p> <p>6.5 Discretionary Activities</p> <p>6.6 Standards for Temporary Military Training Activities and Network Utilities</p> <p>7 SUBDIVISION AND FINANCIAL CONTRIBUTIONS</p> <p>7.1 Explanation</p> <p>7.2 Information to be supplied with applications for Subdivision Consent</p>	<p>Chapter 15 – Monitoring and Review</p> <p>Chapter 16 – References</p> <p>Chapter 17 – Appendices</p> <p>The Plan has a fairly simple approach.</p> <p>In March 2015 the West Coast Regional Council (the Council) notified the Proposed Regional Policy Statement in accordance with the provisions of the First Schedule of the Resource Management Act 1991. A total of 72 submissions were received.</p> <p>Staff prepared a Summary of the Decisions Requested on the Proposed Regional Policy Statement for the West Coast and released this for further submissions on 6 November 2015. A total of 22 further submissions were received.</p>

Grey District Plan	Buller District Plan	Westland District Plan	West Coast Regional Plan
			<p>7.3 Activities</p> <p>7.4 Subdivision to be declined in certain circumstances</p> <p>7.5 Matters over which control is reserved on Controlled Activities</p> <p>7.6 Assessment of Discretionary Subdivision Activities</p> <p>7.7 Financial Contributions for Land Use and Subdivision Consents</p> <p>PART 8 GENERAL RULES - PERFORMANCE STANDARDS FOR ALL ACTIVITIES IN ALL ZONES</p> <p>8.1 Explanation</p> <p>8.2 Signs</p> <p>8.3 Stormwater Disposal</p>

Grey District Plan	Buller District Plan	Westland District Plan	West Coast Regional Plan
			<p>8.4 Roadside Planting</p> <p>8.5 Glare</p> <p>8.6 Hazardous Substances</p> <p>8.7 Use of Roads</p> <p>8.8 Airport Protection</p> <p>8.9 Access</p> <p>8.10 Manoeuvring and Parking Space Dimensions for Cars</p> <p>PART 9 DEFINITIONS</p> <p>PART 10 APPENDICES</p> <p>The first part of the District Plan sets out the key objectives of the Plan and the policies to achieve those objectives. The District is then divided into “Policy Units” or zones, which outline specific performance standards in set communities within Westland. There are also</p>

	Grey District Plan	Buller District Plan	Westland District Plan	West Coast Regional Plan
			<p>rules that apply across all zones listed in Part 6 and 8.</p> <p>Subdivision similarly has its own section. The Plan usually states what is a 'permitted activity', which is what can be undertaken without a consent. If an activity is not permitted then the District Plan outlines what status that activity will have and what matters the proposal will be assessed against.</p>	
Management of DOC land	<p>Council commissioned a landscape study to identify outstanding landscapes and natural features. This study focussed on areas outside of public conservation lands administered by the Department of Conservation given that these areas have some level of protection. Accordingly it should not be assumed that areas administered by the Department of Conservation but not identified in the Councils landscape study do not include</p>	<p>Managing activities on DOC land: in order to avoid duplication of information and facilitate streamlining of the application process, the Department of Conservation and the Council have agreed that, as far as possible, one environmental effects assessment will generally be acceptable for both applications provided that the information requirements specified by both have been fully met. Therefore, in preparing an assessment the</p>	<p>Much of the land within the Rural Policy Unit is managed by the Department of Conservation and publicly owned. Permission from the Department of Conservation is required in addition to the Council, for activities on this land.</p>	<p><i>In addition to the resource consent requirements in this Plan, activities undertaken on public conservation land must also comply with any concession requirements of the Department of Conservation.</i></p> <p>The Plan identifies and protects significant wetlands. There seems to be reliance on DOC work to identify significant wetlands and habitats of threatened species.</p>

	Grey District Plan	Buller District Plan	Westland District Plan	West Coast Regional Plan
	outstanding natural features and landscapes.	applicant should consult with both organisations. Separate hearings will be held and separate documents issued, given that they cover different functions under different statutes.		
Significant Natural Areas	The four Councils prepared a document in August 2001 on “significant natural area assessment and protection”. This document was prepared to help Councils and other organisations meet the requirements of section 6(c) of the RMA. This document describes the process developed by the WC Councils. A separate document describes and evaluates the WC SNA project. As a result of this 2001 document each Council decided the next step for their area.			
	Based on the joint document, the GDC decided to continue on identifying SNA’s and the council proposed in 2005, to undertake a SNA (Significant Natural Area) Study to identify areas of significant indigenous vegetation and habitats of fauna on the West Coast and the appropriate methods of sustaining their values. This was intended to be a co-operative exercise between such diverse organisations as Department of Conservation, district councils, regional council, Timberlands, Federated Farmers, Farm	None listed in the Plan. The Plan does note that it has ‘little direct management control over many natural areas’.	<i>Within three years of the adoption of this plan the Westland District Council will notify a change pursuant to the First Schedule of the Resource Management Act 1991 involving the listing and/or mapping within the Plan of all land, other than land held for conservation purposes, on which there is significant indigenous vegetation or significant habitats of indigenous fauna.</i> The Plan does not contain such a list and such areas are not identified on the planning maps.	The proposed RPS contains objectives and policies on biodiversity and landscape values. It does not set criteria to determine whether a landscape is outstanding or criteria to identify significant natural areas.

	Grey District Plan	Buller District Plan	Westland District Plan	West Coast Regional Plan
	<p>Forestry Association, MAF, landowners and Royal Forest and Bird Society and other conservation groups and individuals.</p> <p>The Plan does contain rules that manage the clearance of indigenous vegetation: 19.7 Rule 5.</p>			

Appendix 4: Interview Questions

West Coast Resource Management Services Review – Stakeholder Questions

[For the purposes of this review “Resource Management Services” include planning, consenting and compliance monitoring]

The Challenges

1. In your view, what are the significant resource management issues facing the region?
2. In terms of the significant resource management issues identified above, is the resolution of those issues hampered by way that resource management services are currently delivered?
3. What has been your experience in working with the West Coast Council’s on planning, consenting, and compliance matters, and what challenges has that presented?
4. What has been your experience of any co-ordination between the West Coast Council’s, or between Council’s and other relevant government agencies on planning, consenting, and compliance matters?
5. How well aligned are the resource management services between the various Council’s?
6. What has been your experience of the quality of Council decision making on resource management matters on the West Coast?
7. In your view, has the way that resource management services are being delivered, had a positive or negative impact on economic, social or cultural wellbeing of the West Coast community, and the environment?
8. What concerns (if any) do you have regarding the current delivery of resource management services on the West Coast with regard to their effectiveness, efficiency, and cost?

The Opportunities and Options

9. What in your opinion are the ways in which effectiveness, efficiency and costs for resource management services on the West Coast can be improved?
10. What are the range of things that you think that greater joint service delivery or collaboration on resource management services on the West Coast should cover?
11. What do you think would be the major advantages and disadvantages of greater joint service delivery or collaboration on resource management services on the West Coast?
12. How do you feel about the potential that greater joint delivery of resource management services or collaboration in the region as a whole may involve ‘trade-offs’ or concessions that reduce local discretion in some areas?
13. What would be the major obstacles/challenges that could impede greater joint delivery of resource management services on the West Coast?
14. If joint delivery of resource management services did not occur, what other options could be considered to improve regional collaboration and co-ordination to achieve greater effectiveness, efficiency and lower cost of resource management services on the West Coast?

West Coast Resource Management Services Review – Council Questions

[For the purposes of this review “Resource Management Services” include planning, consenting and compliance monitoring]

The Challenges

1. In your view, what are the significant resource management issues facing the region?
2. In terms of the significant resource management issues identified above, is the resolution of those issues hampered by way that resource management services are currently delivered?
3. In your view, has the way that resource management services are being delivered, had a positive or negative impact on economic, social or cultural wellbeing of the West Coast community, and/or the environment?
4. What concerns (if any) do you have regarding the current delivery of resource management services on the West Coast with regard to their effectiveness, efficiency, and cost?
5. What has been your experience in working with other West Coast Council’s on planning, consenting, and compliance matters, and what challenges has that presented?
6. What (if any) joint service delivery and collaboration between the West Coast Council’s already occurs on resource management services?
7. In terms of any joint service delivery and collaboration identified above, how effective have these processes been?
8. How much of the resource management services work do you carry out internally and how much is contracted out? What are the pros and cons of contracting out resource management work?

The Opportunities and Options

9. What in your opinion are the ways in which effectiveness, efficiency and costs for resource management services on the West Coast can be improved?
10. What are the range of things that you think that greater joint service delivery or collaboration on resource management services on the West Coast should cover?
11. What do you think would be the major advantages and disadvantages of greater joint service delivery or collaboration on resource management services on the West Coast?
12. How do you feel about the potential that greater joint delivery of resource management services or collaboration in the region as a whole may involve ‘trade-offs’ or concessions that reduce local discretion in some areas?
13. What would be the major obstacles/challenges that could impede greater joint delivery of resource management services on the West Coast?
14. If joint delivery of resource management services did not occur, what other options could be considered to improve regional collaboration and co-ordination to achieve greater effectiveness, efficiency and lower cost of resource management services on the West Coast.

Appendix 5: Evaluation Criteria Example

A hypothetical example of application of the evaluation criteria against the Medium Level Change option groups:

Table 5: Hypothetical application of evaluation matrix

	Better		Neutral		Worse		Notes
	5	4	3	2	1		
To what extent does the option “one district plan and one district RM team for the West Coast Region”:							
a) Change the level of service to applicants and consent holders (clarity, transparency, ease of use, accessibility, coordination)		4					Some improvement is expected with the “one plan” approach being more transparent for users and easier to understand.
b) Change costs for the councils (monetary and non-monetary e.g. time)			3				Some improvement is expected with the “one plan” approach with the ability to consistently apply the rules across the whole region and costing less to administer. This would be countered by the cost of developing the new plan.
c) Change costs for applicants/consent holders (monetary and non-monetary e.g. time)			3				Some improvement is expected with the “one plan” approach being coordinated across the whole region avoiding the need for different consent applications for the same project in different districts.
d) Change the efficiency of RM services (do benefits outweigh costs?)	5						Significant improvement is expected with the “one plan” approach enabling integration of provisions and process, giving greater clarity in the application of the District Plan across the Region.

					Overall it is expected that benefits would outweigh costs.
e) Change the effectiveness of RM services (how do the services contribute to achieving the Resource Management Act)			3		Given essentially the same content, it is not anticipated there would be any change to environmental outcomes or achievement of the purpose of the Resource Management Act.
f) Impact on environmental wellbeing (short, medium or long term)		4			Some improvement is expected with the “one plan” approach enabling coordination of objectives, policies and rules.
g) Impact on social wellbeing (short, medium or long term)			3		Some improvement is expected with the “one plan” approach being easier for the community to understand.
h) Impact on cultural wellbeing (short, medium or long term)		4			Given essentially the same content, it is not anticipated there would be any change to cultural outcomes.
i) Impact on economic wellbeing (e.g. economic growth, short, medium or long term)		4			Some improvement is expected with the “one plan” approach being easier to understand and thus providing greater certainty for development in the region.
j) Impact on growth opportunities (e.g. contribution to employment)	5				Significant improvement is expected with the “one plan” approach being easier to understand and thus providing greater certainty for development in the region.
k) Impact on managing region wide issues (e.g. hazards, coast, landscapes, biodiversity)	5				Significant improvement is expected with the “one plan” approach being better able to recognise and provide for region wide matters such as hazards, coast, landscapes, and biodiversity.
l) Change the ability to meet the particular needs of local districts			3		The “one plan” approach should still be able to meet local needs if prepared appropriately to incorporate particular local issues.
Total Score (out of 60)			46		