

## Draft West Coast proposal: written submissions received

The following submissions have been received on the draft proposal:

1. Ben Gaia (Westland District)
2. Anthea & Rex Keenan (Westland District)
3. Phil Perrott (Buller District)
4. Grant Parrett (Buller District)
5. Birchfield Coal Mines Ltd (Grey District)
6. Westpower (across 3 districts)
7. Grey District Council (Grey District)
8. Westland Milk Products (across 3 districts)
9. Westland District Council (Westland District)
10. Tasman District Council
11. Paul Elwell-Sutton (Westland District)
12. David Barnes (Buller District)
13. West Coast Tai Poutini Conservation Board (across 3 districts)
14. Charlotte May (Buller District)
15. JP Molloy (Grey District)
16. Ministry for the Environment
17. Trustpower (Grey & Westland districts)
18. Allen Morris (Buller District)
19. Lynda & Chris Reynolds (Buller District)
20. Clare Backes & Keith Morfett (Westland District)
21. Forest and Bird, West Coast Branch (across 3 districts)
22. Paul Scanlon (Buller District)
23. West Coast Regional Council (across 3 districts)
24. Buller Electricity Ltd (Buller District)
25. Buller District Council (Buller District)

26. Te Rūnanga o Ngāti Waewae (across 3 districts)
27. Community and Public Health, West Coast (across 3 districts)
28. Phil Rutherford (Buller District)
29. Jimmy Costello (Buller District)
30. Punakaiki Promotions Group (Buller District)
31. Chris Coll Surveying (Buller District)
32. Te Rūnanga o Makaawhio (Westland District)
33. Federated Farmers of NZ (across 3 districts)
34. Mapourika Holdings Ltd (Westland District)
35. Te Rūnanga o Ngāi Tahu (across 3 districts)
36. Sue & Geoff Schurr (Buller District)
37. Minerals West Coast (across 3 districts)
38. Graham Howard (Buller District)

## **No. 1: Ben Gaia**

Please accept this email as my submission.

This issue was initiated by local opposition to approvals for aerial poison spreading into our water supplies. This is pertinent to yesterday's statement by the chairman of the Environmental Defence Society, Gary Taylor, who said the report on land contamination showed a major overhaul of the resource management system was needed.

"Too often regional councils were hijacked by vested interests and conflicts of interest", he said.

"We need to look at a whole range of things, not just the RMA [Resource Management Act], but the agencies that administer it, and free them up from conflicts and perverse pressures that can produce bad outcomes."

All the talk in the draft proposal of "protecting resources" is utter nonsense when approvals are given to drop poison into our water supplies, reservoirs, and wild food sources. Nobody who lives here supports this practice - but we feel we have no control or sovereignty over the decision process. Local democracy should ensure that when, as happened here, Westland District Council, its then Mayor, and a petition signed by over 90% of residents, stated our wish to ban aerial poison drops into our reservoir catchment, then this power should not be over-ridden and ignored by the Regional Council, DOC, Vector, or any other territorial authority.

So my submission remains that it is the REGIONAL council that should be abolished altogether. They clearly have a vested interest in the poison industry having built a plant in Christchurch to produce 1080 poison when they were the authority permitting its use.

The RMA can be used to assist local government by Central government directives and resources through to the local district councils and listening to the community.

Scrap the WCRC, its powers, and its poison manufacturing business and allow local democracy to veto poison drops if the local community are opposed. The WCRC is an unnecessary layer of beaurocracy altogether as well as being undemocratic, unresponsive and having a clear conflict of interest here on the West Coast.

Please accept this as my submission.



## No. 2: Anthea & Rex Keenan

### LOCAL GOVERNMENT COMMISSION SUBMISSION

Thank you Local Government Commission for your consultation and assessment means. The outcome being this Draft Proposal, with one District Plan WILL reduce time, delays, frustrations. Especially those requiring resource consents for development = fine tune processes and efficiency means. However your input will be required to implement and ensure the plan is in place as quickly as possible.

UNIFICATION IS seen to be most cost effective means AS PER YOUR FINDINGS. There is a lot more that can be standardised/collaborated within West Coast Council/s and other leadership entities.

We still see, even recently, extensive increased expenses through Local Authority and CCOs - faults/failures. Costs including added Directors and employment of hierarchy staff - CEOs. Council/s elected members are bulldozing through without obliging statutory obligations and good consultation non respectful to Local Government Act which they sign by oath they will oblige. We regularly see their deficiencies with hefty expense costs, poor decisions without due diligence, poor returns, yet overlooked by Auditors. .

From our observations, we see some Leaders can do much more yet as to cost effectiveness and efficiency for West Coast...We ask that Central Govt. do better for New Zealand, regions going through similar as this one. For a population of 32k (lower medium income levels) –West Coast Buller has over the top leadership level/hierarchy costs incurred by entities such as :

Three District Councils

Regional Council

Council Controlled Organisations

Tourism West Coast

Development West Coast

Economic Development Board

Department of Conservation

WINZ

District Health Boards

Primary Health Organisation

Education sectors

We witness that every time another plan or strategy is required another entity or committee is set up...layers of bureaucrats getting highly paid, reports done yet not carrying out requirements with accountability means!. We experience highly paid officials with overhead costs, looking after their own!. Production and satisfaction at ground level getting less... social disasters happening left right and centre. Let's hope a new government can make the difference.

We have better technology than ever before, ratepayers, residents, community groups must be well and fully informed by excellent, factual and truthful communicative means. No bull dust needed here!. There should be democracy, we have stood strong and spoken out = for leaders to

oblige responsibilities with fairness to all. Fine tune the costs, stop the extravagance and be accountable.

West Coast / Buller has for a long time now and since Govt. changes 30 years ago, been lost as to a strategy going forward. Tourism, alone is not the answer and especially where those in commercial entities undermine heritage values for Tourism gain – creates much unrest and animosity – communities divided = Department of Internal Affairs can do more to solve these issues, which are glaringly obvious.

Appreciation for taking our concerns to task, allowing us to be involved and on behalf of those we originally submitted for and in UNITY/COLLABORATIVE means = COST EFFECTIVE, EFFICIENCY for the West Coast.

Yours sincerely  
Anthea Keenan  
Rex Keenan

### No. 3: Phil Perrott

April 2018

SUBMISSION TO DRAFT PROPOSAL FOR COMBINED WEST COAST DISTRICT PLAN.

Seems to me that the suggested method of arriving at a common District Plan is flawed and costly. It will not amount to reduced costs to ratepayers in the long term as it introduces another layer of bureaucracy with dubious benefit.

The proposal does not address the key problem i.e. too many councils and councillors.

There is no need to have a Regional Council for the West Coast area and the performance that they have demonstrated is pathetic. 50 staff can be mostly be eliminated. Huge overheads can be eliminated with all of their dubious functions absorbed by the other 3 councils. With 80% or more of the land area tied up in the hands of DOC there is no need for Regional Council to be involved. The remaining land area is long and narrow which Regional Council cannot handle anyway.

West Coast consists only of 30,000+ population. Far too much governance with 4 councils and goodness only knows how many staff in total.

If DOC controlled land paid rates the cost would be spread nationwide rather than locally.

The Buller area can easily be managed with no more than 6 councillors. 2 Westport based and 1 each north, south and east plus a Mayor. If necessary small community boards could cover each population base to be the eyes and ears on the ground.

The other 2 councils could be organised along the same lines.

Staff rationalisation has started to happen but clearly a common IT system needs to be established. This would enable staff to be interchangeable as required.

Minor functions can be eliminated e.g. dog control handed to SPCA, health and alcohol inspectors reduced and interchangeable, building inspectors interchangeable as demanded etc. Engineering functions particularly around water supplies can be rationalised by contracting out to a more competent knowledge base/experience base.

Already Buller has decided NOT to promote the area which is a huge mistake however this function is now going to be picked up by Development West Coast which will absorb Tourism West Coast so in reality that should provide a good solution and certainly better than leaving promotion/economic development to Regional Council who have failed in this role.

Submitter. P N Perrott

[REDACTED]

[REDACTED]

[REDACTED]

I do not need to appear at any hearings.

#### **No. 4: Grant Parrett**

Re Draft proposal for combined West Coast District Plan

- We support the proposal as we feel there will be cost savings and efficiency gains in the combined approach
- We are hoping for better town planning as a result.
- We would like to be consulted in terms of any changes to land designation so we can consider the effects of such changes from a community and business perspective

Regards Grant Parrett

Wild Coast Ltd



## No. 5: Birchfield Coal Mines Ltd

# BIRCHFIELD COAL MINES LTD

p: (03) 732 8360 f: (03) 732 8335 e: birchcoal@snip.net.nz w: www.birchfieldcoal.co.nz  
PO Box 264, Greymouth 7840, West Coast, New Zealand

7 May 2018

Local Government Commission  
PO Box 5362  
Wellington 6140

### Draft Proposal for a Combined West Coast District Plan – Submission

Dear Sir / Madam,

This letter is a submission in support of the proposal for a Combined West Coast District Plan. This submission seeks some further additions to the proposal in relation to the administration of any such combined plan as follows:

- The responsibility for the administration of the combined district plan in relation to processing and monitoring of resource consents relating to land use such as mining, agriculture or vegetation clearance activities should also be transferred to the West Coast Regional Council.

The reasons for this submission are as follows:

- Any reduction or simplification of planning legislation across the West Coast will see benefits in productivity and encourage investment within the region.
- The ability for potential resource consent applicants to deal with one consent authority throughout any application process will improve efficiency and reduce costs related to resource consent applications.
- The reconciliation of district plans across the 3 districts will represent a saving to ratepayers, with costs shared into the future, including hearing and plan review processes.
- All district plans are currently overdue for review and an overall review and reorganisation will provide an opportunity for a more up to date and robust planning framework to be implemented across the region.
- The West Coast Regional Council is the best resourced and most experienced consent authority in relation to consent processing and compliance monitoring.

I wish to be heard in relation to this submission.

Yours Sincerely



Phil McKinnel



## No. 6: Westpower



26 April 2018

Local Government Commission  
PO Box 5362  
WELLINGTON 6140

Via Email: [submissions@lqc.govt.nz](mailto:submissions@lqc.govt.nz)

Dear Commissioners,

### **Proposal for a Combined West Coast District Plan**

Westpower is a Community Owned Electricity Distribution Business (EDB) providing lines services to 12,000 individual premises on the West Coast.

The consumers that Westpower services include all of the Grey District, the vast majority of those in the Westland District, and a large number in the Buller District.

Westpower is therefore a truly regional business, and has regular dealings with each of the three District Councils and the West Coast Regional Council.

We note from the draft proposal that the Commission has stated its intention to effect some change in the local government arrangement on the West Coast, but not to extend that change into a complete reorganisation which would result in the amalgamation of the four Councils. Instead the proposal is based on a more collaborative approach and shared service approach, focussed on the District Plan.

In the absence of a more extensive mandate for change, Westpower supports a more collaborative approach by the regions Councils. Sharing of services where there are clear community benefits should be a key focus for West Coast Councils.

With regard to the specific District Plan proposal, Westpower supports the approach. We note that consistent rules for region wide businesses are mentioned in the draft proposal, and that this is a desired outcome.

Electricity infrastructure is also specifically mentioned as an area where significant benefits may accrue. There are currently inconsistencies in treatment between the existing district plans in respect of electricity infrastructure. A combined plan would align treatment across the region and create a benefit for private landowners and consumers.

*West Coast's Locally Owned Electricity Distributor*

Westpower Limited  
146 Tainui Street  
PO Box 375, Greymouth  
Telephone 03 768 9300  
Facsimile 03 768 2766

## No. 7: Grey District Council



105 Tainui St | Greymouth 7805  
PO Box 382 | Greymouth 7840  
Tel 03 769 8600  
Fax 03 769 8603  
info@greydc.govt.nz  
www.greydc.govt.nz

10 May 2018

The Local Government Commission  
PO Box 5362  
WELLINGTON 6140

[submissions@lgc.govt.nz](mailto:submissions@lgc.govt.nz)

### **SUBMISSION: DRAFT PROPOSAL FOR A COMBINED WEST COAST DISTRICT PLAN**

I herewith confirm my Council's submission per your survey monkey platform done yesterday.

My Council is in support of the proposal for a Combined West Coast District Plan with the following amendments to the proposal:

- The Joint Council Committee must be created as part of the determination.
- The composition and logistics of the Joint Council Committee must be determined as part of the determination. It is our preference that this be decided after consultation with the respective Councils.
- The determination must authorise the TAs to contribute financially to the Combined District Plan despite it no longer being a District Council function.

Council is disappointed with the fact that the ability of the Territorial Authorities to develop and promulgate a District Plan has been taken away from us and put under the WCRC, as a local authority that ordinarily has no District Planning functions, but it understands the circumstances that have resulted in it.

Council is of the opinion that the Combined Plan cannot come soon enough. Our experience has been that circa 25% of the total costs of an Operative Plan is involved in actual Plan development with the balance involved in the process of legal and other interaction to get it to promulgation. Under the Combined Plan scenario, these costs will be spread amongst four local authorities (together with a very welcome LGC contribution) which makes it a "no brainer".

We do not wish to speak to the submission.

Kind regards

**Paul Pretorius**

CHIEF EXECUTIVE OFFICER

cc: Mayor and Councillors  
Management Team  
Mike Meehan, WCRC  
Andy Gowland-Douglas, BDC  
Simon Bastion, WDC  
Chris Mackenzie, DWC

## **No. 8: Westland Milk Products**

11 May 2018

### **Submission to:**

### **DRAFT PROPOSAL FOR A COMBINED WEST COAST DISTRICT PLAN**

#### **Introduction**

1. Westland Co-operative Dairy Company Ltd (trading as Westland Milk Products) is pleased to submit the following submission to the Local Government Commission's West Coast local government reorganisation proposal for a unified West Coast District Plan.

2. Westland Milk Products (Westland) is a key economic driver of the West Coast economy.

3. Dairying is the biggest contributor to GDP in the West Coast. In 2016 the dairy industry generated more than 14.3% or \$234.4 million in GDP to the region. The dairy industry also provided for 9.2% regional employment (1,528 jobs) on the West Coast.

4. The majority of these jobs were provided by Westland (directly employed staff, plus shareholders and their employees). As one of the region's biggest employers (420 FTE on the West Coast), Westland is a major contributor to the economic wellbeing of a great many families, businesses and other industries in the region. Gross earnings at 31 March 2018 for West Coast located employees was \$37.8m million. The incomes of shareholder farmers and their employees are additional to this figure.

5. Westland has a vital interest in the efficient and effective functioning of the West Coast Region's infrastructure. It is one of the largest end users of electricity on the West Coast and is heavily dependent on local transport and communications networks.

6. Westland and its 350 shareholding farmers on the West Coast also rely on a variety of district and regional resource consents, governing factory and on-farm operations, to conduct their business.

7. Westland's key concerns are: • fortifying our power supply and security; • strengthening and upgrading our road transport networks; • strengthening and modernising our communications networks (this includes mobile phone coverage and broadband access and speed); • building a resilient and diverse community; and • working together on protecting our unique environment.

#### **Submission**

8. Westland Milk Products supports a combined West Coast District Plan under the Resource Management Act 1991 ("Combined Plan") as outlined in the Local Government Commission's Draft Proposal for Combined West Coast District Plan.

9. Currently the West Coast region is vulnerable to business disruption (2018's tropical cyclone damage is an example).

10. Roothing, electricity and communications networks need to be strengthened throughout the region. The current system of three district councils and one regional council working separately on these issues creates disunity and works against the Coastwide progress that is needed on these issues.

11. The West Coast Region is also threatened by the lack of resident expertise on many key issues. We are keen to see, and support, Coast-wide policies that will make the West Coast more attractive, not only to more residents, but to attract a wider variety of people who can bring national and international experience to the region.

12. Westland believes that a Combined Plan will be conducive to collaborative approaches to marketing the appeal of the West Coast as an employment and lifestyle destination.

13. We support the Local Government Commission's contention that a Combined Plan will:

- enable a good quality regional plan to be produced through effective use of specialised staff and outside resource;
- provide consistent policies, definitions and rules. We note that currently Westland and some of our farmers whose interests cross borders between different districts often have to make multiple applications to allow the same single function to achieve resource consent;
- will save time and money for those making consent applications and submissions to district plans;
- will produce more consistent resource consent requirements, resulting in less time and money being spent by applicants and processing authorities;
- that a Combined Plan for a wider and more diverse area is likely to help attract and retain more experienced staff (not just within council functions but also for large businesses like Westland that rely on the West Coast being perceived not as a professional 'dead end', but instead as a progressive stepping stone in someone's career.

14. Westland further contends that a Combined Plan will enhance opportunities to ensure the unique, and vital, West Coast environment is protected and that all businesses on the Coast comply with identical, unifying, environmental policies.

15. The environment of the West Coast is a point of differentiation for Westland (and other companies) in terms of marketing and positioning West Coast products in domestic and international markets. A consistent and sustainable approach to environmental management on the West Coast is conducive to business success and sustainability and, in turn, will enhance cultural and community wellbeing.

16. A Combined Plan will support regional development, especially in terms of growing regional resilience for:

- electrical supply;
- transportation links; and
- communications networks.

It is Westland's contention that current district and regional divisions between territorial local authorities prevent the West Coast from having an effective and unified voice at Government level, meaning that regional development opportunities are neither well advocated nor able to be effectively acted upon.

## **Summary**

17. Westland Milk Products supports the proposal for:

1. the obligations of Buller, Grey and Westland district councils to prepare and maintain a district plan under the Resource Management Act 1991 (RMA) are transferred to West Coast Regional Council.
2. the establishment of a joint committee, comprising West Coast Regional Council, the three district councils and local iwi, responsible for preparing and approving a new combined plan.

18. Westland believes a single District Plan will produce: • significant savings in providing infrastructure services such as water, transport and communications networks; • a more consistent regulatory framework throughout the West Coast; • higher quality, more efficient, faster and more consistent services that will benefit businesses and residents; and • ultimately the above benefits will help enable the higher and more sustainable level of economic development that is urgently required.

With thanks for your time and consideration.

**Toni Brendish**

Chief Executive

Westland Milk Products

## No. 9: Westland District Council



Westland District Council  
95 Weld Street  
Private Bag 704  
Nelson 7042

Phone 03 768 9010  
Fax 03 768 9045  
Email [council@westlanddc.govt.nz](mailto:council@westlanddc.govt.nz)

ALJERES CC: 10

11 May 2018

The Local Government Commission  
PO Box 5362  
Wellington 6140

Via Email: [submissions@lgc.govt.nz](mailto:submissions@lgc.govt.nz)

### **SUBMISSION: DRAFT PROPOSAL FOR A COMBINED WEST COAST DISTRICT PLAN**

We wish to advise that Westland District Council fully endorse the concept of a combined "One District Plan" for the region.

We see that it is critical that a fully functional and effective Joint Council Committee will provide the correct governance required to oversee the program of work over the period required.

We would also like to point out that any changes to the members of the committee should not affect or re-litigate progress already made.

We endorse the inclusion of an independent chair and an implementation team manager. Westland District Council suggests further refinement as per the following:

- That the Commission will consider the logistics and operation of the Joint Council Committee after consulting with the local authorities involved.
- That the LGC makes it part of their determination that the District Councils can continue funding the Combined Plan despite District Planning no longer being its core function as a result of the determination.

The process for completing the District Plan can be contentious between different parties and could lead to cost escalation. However, by combining the District Plans these means only one set of legal and development costs compared to three. Our belief is that once this process is complete the benefits out way the negatives. Having a common approach to all aspects of the District Plan across a very long region will be advantageous to all businesses and households.

We do not wish to speak to the submission.

Sincerely

**Simon Bastion**  
**Chief Executive**  
the last best place  
**Westland**

Page | 1

## No. 10: Tasman District Council

**From:** Richard Kempthorne <[Richard.Kempthorne@tasman.govt.nz](mailto:Richard.Kempthorne@tasman.govt.nz)>

**Date:** 7 May 2018 at 12:00:31 PM NZST

**To:** "[Simon.Cunliffe@dia.govt.nz](mailto:Simon.Cunliffe@dia.govt.nz)" <[Simon.Cunliffe@dia.govt.nz](mailto:Simon.Cunliffe@dia.govt.nz)>

**Subject:** RE: Local Government Commission: Release of Draft Proposal for combined West Coast District Plan

To whom it may concern,

Thank you for the opportunity to submit on the Proposal for combined West Coast District Plan.

We support the proposal with no comments to make and do not wish to be heard.

Regards,

Mayor Richard Kempthorne

**Richard Kempthorne**

Mayor

DDI 03 543 8400 | Mobile 027 223 4000 | [Richard.Kempthorne@tasman.govt.nz](mailto:Richard.Kempthorne@tasman.govt.nz)

Private Bag 4, Richmond 7050, NZ

## No. 11: Paul Elwell-Sutton

**Name:** Paul Elwell-Sutton

**Address:** [REDACTED]

**Email:** [REDACTED]

**Phone:** No phone

### Submission

I **oppose** the proposal as it stands.

#### Reasons.

- 1.) The proposal is a confusing 'halfway house' and a watered-down version of what is required, presumably in an attempt to please everyone and assuage parochial concerns.
- 2.) What I favour and call for is a unitary authority for the entire West Coast with local boards for Buller, Grey and Westland.

Such an arrangement will eliminate confusion over which local authority/council administers what, as well as the inefficient overlap between them.

As the proposal summary states, a single council will be able to attract, remunerate and retain suitably qualified, highly skilled and experienced staff, which four separate councils have difficulty doing.

Administration of council duties under the legislation applying to territorial and regional bodies is a highly skilled and at times onerous task, in which there is no scope for poorly informed amateurs, so top quality staff are essential for top quality outcomes, which by their nature will reduce or eliminate the likelihood of endless and costly litigation.

This is likely to guard effectively against the ignorant and bigoted parochialism which often afflicts local authorities in rural areas with small populations.

- 3.) A single unitary council with local boards will enable democratic process at local level while feeding into the efficiencies and absence of duplication associated with a single West Coast unitary authority.

- 4.) A single unitary council may be easier to monitor for agency capture than four, and to take corrective action against.

Agency capture of local authorities by sectoral interests is an insidious feature in New Zealand, especially in rural areas, where their capture is common and rarely detected or corrected.

- 5.) In the event that the unitary council imposes, for example, comprehensive polluter pays policies which result in a real or perceived reduction in future profits for an overseas-owned industry on the Coast, such as a mining or dairying venture, prosecution under the Investment-State Disputes System (ISDS) provisions of some if not all of the Trade and Investment Agreements to which NZ is party, are likely to be invoked, resulting in heavy multi-million dollar fines against the council by the overseas tribunals set up to adjudicate such disputes.

A unitary authority is more likely to have access to the skilled and expensive resources to successfully fight such claims.

- 6.) In the event of litigation against the council for breach of duty, it will be easier and cheaper for civil litigants such as NGOs, to fight for justice against one council than against four.

**End of submission.**

[REDACTED]

13/5/2018.



**No. 12: David Barnes**

To the

Local Government Commission,

PO Box 5362, Wellington 6140

My submission to the April 2018 Draft proposal for the combined West Coast District Plan which I have read and followed the deliberations of the Buller District Council is that under no circumstance would I entertain a combined Council or Plan.

I see the three districts as being divided by very different local problems, huge distances and geographical features presenting significant logistics apart from culture and population approaches which have evolved diverse ways of dealing with each.

There is absolutely nothing to be gained and everything to lose and in particular rating costs which are dictated to by all of the above and will be exacerbated in a single Council.

I wish it to be recorded I support Buller District Councils decisions and agree that there should be no Combined West Coast District Council or Plan.

Please acknowledge receipt

David Barnes



## No. 13: West Coast Tai Poutini Conservation Board

16 May 2018

Donald Riezebos  
Acting Chief Executive Officer  
Local Government Commission

Dear Donald

### RE: DRAFT PROPOSAL FOR COMBINED WEST COAST DISTRICT PLAN

Thank you for the opportunity to consider the above draft proposal.

As an 'interested party' the West Coast *Tai Poutini* Conservation Board appreciates involvement in this process. It is noted at this stage the intention is to establish a joint committee to prepare and approve new combined joint district plan for the West Coast. The following points are noted with this process.

There is no indication of the process post development of the proposed new district plan i.e. it is stated that the combined committee will 'approve' the plan. Would this be without further public consultation or would consultation be post committee approval? This is considered an important public process and direct involvement is essential.

It is noted that the proposed "Transitional Board" does not have a representative from the Department of Conservation. As the major 'land manager' on the West Coast (85% is public conservation land) and a major contributor to the regional economy via tourism to the conservation estate the Board considers that a representative should have direct involvement with the decision making processes in the "Transition Board". In addition, although it is stated that the Department of Conservation does not pay rates on the conservation estate there is no consideration of the value of tourism to the West Coast based on the conservation estate.

The Board notes that any changes to regional infrastructure may have impact on the Conservation Management strategy for the West Coast including the management of consent processes for Resource Management Act applications and approval processes, and that this must be taken in to consideration in the potential evolution of the reorganisation proposal.

Yours sincerely

Michael Legge (Dr)  
Chair - West Coast *Tai Poutini* Conservation Board

## No. 14: Charlotte May

### **Submission to LOCAL GOVERNMENT COMMISSION** **Combined West Coast District Plan**

*Charlotte May* – [REDACTED]

**I would prefer to have Fully Amalgamated West Coast Councils with the Regional Council being the Central Pin... but  
If not, then the One District Plan from all District Councils under the Regional Council would be a good start.**

**An example I have of RMA misuse and the long-term problems that this misuse will cause a small group of people because of no due diligence, and the lack of Council accountability. This needs to be more rigorously monitored by Central Government and avenues to resolve issues put within all Local Bodies and RMA amendments or new legislation.**

Two small Water Supplies – (as brief as possible)  
One from **1870's** – Weir and very close to Source. Private supply for 14/15 homes. Those Private people maintain area of water supply. Monitors and Records the changes to the Source. Fully autonomous. In 1950 they used one their lines to go down to an abandoned Tank after State Housing needed water to 7 houses in another area of Granity. State Housing completed the Tank and added an outward reticulation to the 7 houses.

The other – this abandoned half-built Tank from **1950**. Down stream from Weir. State Housing – used for 7 houses. In 1996 State Housing had sold all 7 properties and gifted the Tank to the people on it. Those people feel unable to look after their Tank and the District Council (Buller) administrates.

In 2010 the Council decided it 'owned' both (as they needed more numbers to apply for a Govt Subsidy for an Upgrade that was not legally required). They ignored the older Supply ... BUT did add their numbers, and their supply, to the other (Tank)supply to pretend it was one... in the hope they could get more subsidy money. Then... they (BDC) got a Resource Consent ... as of take from a Reservoir. Of course, then they had to try and cut the older supply's pipes off to pretend they weren't there. This had to be fixed by the Weir Supply's members once finding out the lengths the deceivers would go too.

A couple of years later questions started to be asked. It was found that the Regional Council actually gave the District Council a Resource Consent (as mentioned) when the map of supply they were given ...actually showed the other lines from the Weir Supply!!!! But... there's more.

The District Council on finding out that they didn't own either.... (and because they had been grooming the Tank Supply people only) they transferred the Resource Consent to the Tank Supply. (at that time representing no one and unincorporated)  
**Page 1 (CGMay-WC One District Plan 17/5/18)**

Now the Tank supply persons that have no interest in the Source and looking after their Tank .... Have a Resource Consent!

When a Barrister was engaged to get the Weir Supply off the Council and to also help with a Resource Consent application for us (Weir Supply) .... At the very last minute ... (we are aware now that this was deception) ... the Regional Council said. oh, if you withdraw your application we'll give you a Code of Compliance. We were told we would have the same protection. We made the mistake of trusting a Council. Trust is no longer possible. (This was done to take away our long held right to care for the Source)

The Owners of the Tank Supply also contributed to this by being able (as groomed) to use the powers of the Buller District Council against us.

We look after our Supply and Source as we always have ... but because the District Council did NOT surrender this RC we are constantly under threat from both Councils decisions and the owners of a downstream Tanks group inabilities.

**Please whomever is reading this.... We live under constant threat from Councils that are inapt.**

**Please be so sure that you allow for 'ERRORS' to be corrected.**

**Please look at the accountably when implementing responsibilities of ALL Council persons. We (the people) have no assess to service able to address/rectify incompetence.**

**So, we look to the Local Government Commission to please (whether combined Councils or combined District Plans) make absolutely sure that complete communication and involvement occurs in this Ribbon Road Region with your final decision.**

**There is a great distance to cover on the Coast and yet that distance would be well managed if the communication and ability to correct errors is available to ALL ratepayers.**

**If you consider that our experience (both then and into the future) is acceptable .... Then you have either not spoken to us or do not understand the responsibility you have.**

**To note: At the moment 7 Private Supplies were 'acquired' by the Buller District Council who did not own them. Population number significantly increased for Government funding applications.**

- 1. Two (the ones I speak of) the Council had to admit they didn't own.**
- 2. Another had a Subsidy granted and Supply Upgrade as under BDC ownership.... But it was a Private Supply previously.**

Page 2 (CGMay-WC One District Plan 17/5/18)

3. Two are farm or very small supplies. (two small communities) Private.
4. One the Buller District Council is trying to give back but the difficulty now lies with the Canterbury District Health Board who are trying to 'pretend' they did not break the Law. Changing Private to Council owed.
5. Another Supply will be going back to the Community it provides for as the Council realise they can't get more money now unless the Supply is Community owned!!  
A Subsidy (on presumption of BDC ownership) is on hold with the Min of Health.

**All were put on the Councils Asset Registers and Resource Consents gained without any communication with the true owners.**

**Do you see what I mean!! Please take care. Please make the Councils responsible.**

**No changes made will make any difference if there isn't a process available where misuse of the RMA or Council decisions can be overturned. Individuals and community groups need to have access to a Central Government Agency that will assist. Easily, without costs (or costs to be borne by the Council Body enacting the misuse).**

**Both Councils (for us) misused their powers by each seeking to cover up what had happened, knowing that the people affected were so disadvantaged that they had no hope financially to engage with the Environmental Courts services.**

**How easily it was done against us you could not believe possible ... but it is..**

**I would consider speaking to my submission but I may be recovering from Hip Replacement Surgery.**

**If able I would do so but would not wish any member of the West Coast Regional Council nor the Buller District Council to be present unless they do not stop me from speaking.**

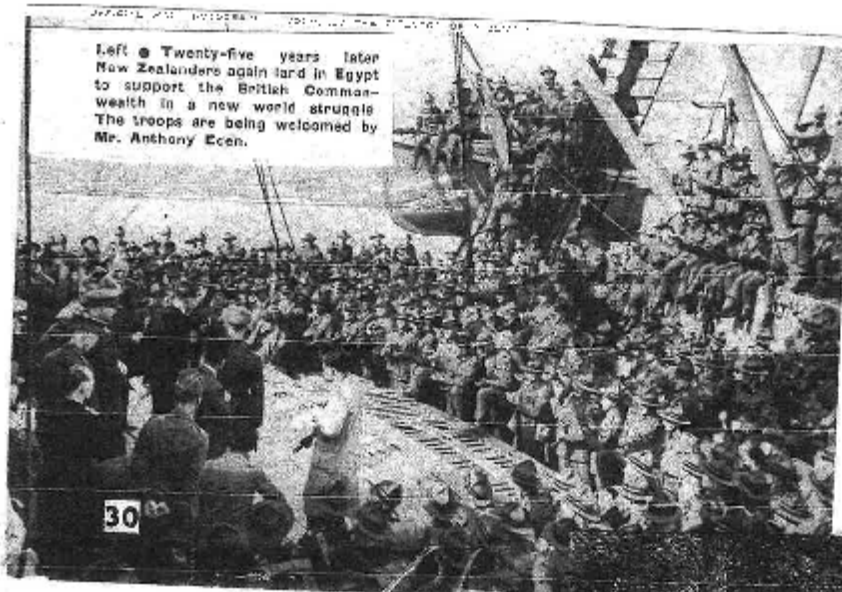
**I hold this issue as being initialled and instigated by the Buller District Council but feel the Regional Council did not do due diligence.**

**Later on, WestMaps Point of Takes were moved. Seemingly by the BDC to try to place the Tank Supplys Point of Take above ours... in fact it was placed far higher up the hill. The Ombudsman's Office did not know what to do.**

**Iwi ratepayers get separate privileges re their personal concerns but 'we' (the others) don't get any at all? This issue is not resolved.**

**Page 3 (CGMay-WC One District Plan 17/5/18)**

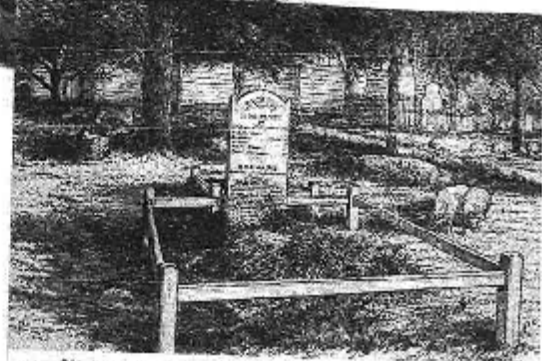
No. 15: JP Molloy



Left • Twenty-five years later New Zealanders again land in Egypt to support the British Commonwealth in a new world struggle. The troops are being welcomed by Mr. Anthony Egan.

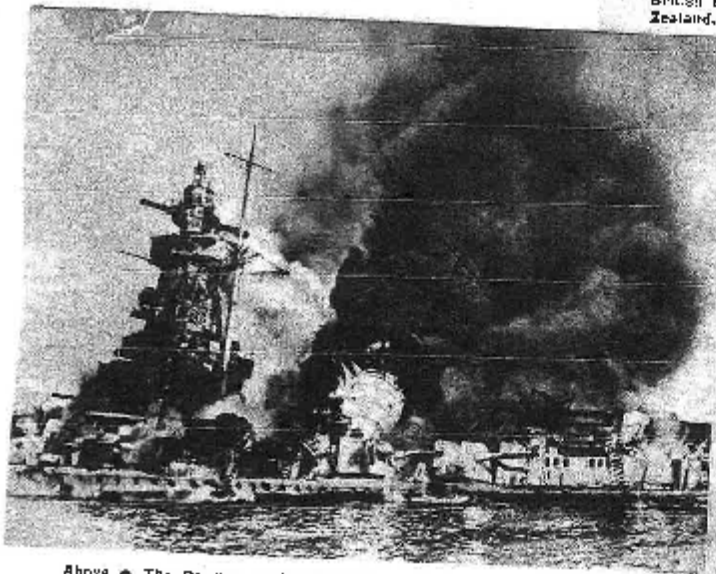
30

*We are one people,  
We have one flag,  
We are one  
Commonwealth,*

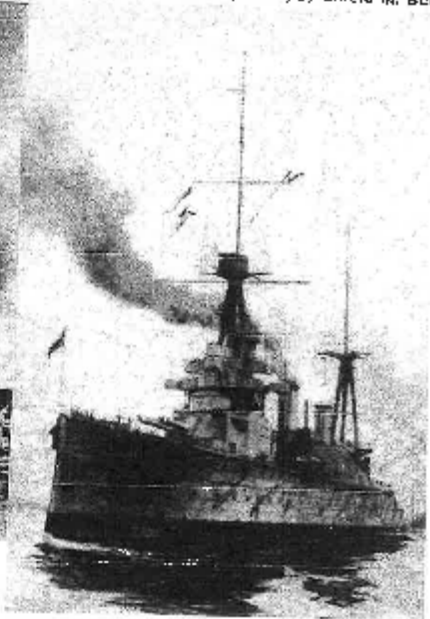


Above • A monument in the cemetery at Russell, Bay Islands, to British sailors of H.M.S. 'Hazard,' killed at Keriwaka in the 'War in the North' in 1845.

Below • H.M.S. 'New Zealand' which was presented to the British Fleet in 1809 by the Government and people of New Zealand. The illustration is from a painting by Gerald M. Bur



Above • The German pocket-battleship 'Admiral Graf Spee,' scuttled by her captain after the naval battle in which New Zealand's 'Mohitang' took an active part. The photograph is taken from the 'Illustrated London News.'



To the local Government Commission,  
PO Box 5362  
Wellington 6140.



I received your draft proposal for a combined West Coast District plan. I believe it places an entirely different agenda to your intentions. It follows in the foot steps of John Key attempt to change the New Zealand Flag, in an attempt to tribalise New Zealand. The treaty of Waitangi gave all New Zealanders Sovereignty, Democracy.

THOSE FEW who try to claim New Zealand are now called Maori. They voted themselves out of parliament in the last election. Now you are attempting to give a few tribal leaders, who call themselves Maori a form of control over NZ they had in the early 1800s. The treaty of Waitangi gave all Sovereignty, Democracy. 17 January 1853 New Zealand changed from the autocratic, form of Government to a self governing Government, which we should enjoy today.

We have 10,000 people waiting for eye surgery, some going blind while waiting, We have 6 people contemplating ending their life, ring help line every day. There are 159,616, an increase of 230% rang up in 2017. Still you keep giving the gluttons few, millions for trumped up reasons. There are increases in the number of children living with Poverty. There are increases

in the number of woman being bashed up. Our jails are over flowing, many Maori.

West Coast area are short of 34 mental health staff, Mid wives are only receiving \$7 an hour. There are many dying while waiting for treatment. Still you let this chap Jones run around up North with multi millions of dollars, playing Santa. Any person with just a speck of humanity in them would not allow him this freedom. Then it appears his boss didnt know he, himself was getting one benefit thinking it was something else. Well here's to whaka jumping to sort this mess out. If your chosen few had that little touch of humanity, they would not accept another dollar. Lets not go into Education for now.

While you give your chosen few millions. I ask you to think on these atrocities then look in the Mirror. Waiting for help destroys one's mind.

If you research back to the time when our Governments started handing out millions to the so called Maori, the chosen few. You might find the Government who handed out the most, received the vote of those chosen ones. Now this could be interpreted as a bribe, isn't that a crime. I like millions of other NZ don't believe we owe Maori anything.

Added to the millions of dollars. We have also given the chosen few, our forests and part of our fisheries. Our forrests have been sent to some foreign



country. Much of the waste areas that remain, are just that waste, while much grows gorse. Now we hear this chap Jones is going to spend millions of our dollars replanting their forsts. Can someone tell me how many votes he received to become big time in parliament. Part of our agreement with the chosen few was that they replant the forests. I am told they don't pay taxes.

We now have a number of those members in parliament, who did not have to stand in any electorate, they now rule our country, they may not have one vote cast for them. Even good old Winston has been slipping beneath the radar. I believe the list members can jump ship anytime, thumb their noses at those who voted for their party, collect their salary and remain on holiday.

Now what was that I said about democracy.

Now let me give you an up date on the tribal input to the zero development of our ghosting West Coast.

1 We have our council syphoning off a large percentage of our rates we pay for land, some land they do not use, this should not be. Paying it into iwi bank.

2 They have dozens of empty homes, unliveable, and sections, an eye sore to any town, that many have walked out of. Some because of the exorbitant land lease.

3 Our workingmans club, shut it,s door, stating the land lease was part

of the reason. So no flag flew there ANZAC day.

4 The once great Victoria Park, the entertainment hub of the West Coast. All gone and replaced by a forest of gorse in the centre of Greymouth. They could not afford the iwi land lease.

5 The Majestic Greymouth Court, has to remain as they iwi, collect land lease each month. How did this happen as the Govt never built on private land.

6 The forest we gave them. The logs are gone, they are now growing gorse in their place.

Then we have iwi problem over the hill. Lake Ellesmer, it's been around since the turn of the century, no progress, now I believe I read the iwi are being removed and iwi share holders are taking over. Costing the tax payer millions. Now millions more to the new lot, while some walk away with glowing bank accounts. While the lake remains an unwanted bowl of slime waters. In North Canterbury iwi have cleared around 20,000 ha. of productive forest on land that was considered to dry for farming, the reason it was turned into forests. These forests, are only a small part of the forests we gave Maori, probably amounting to Billions of dollars, they were the source of thousands of jobs and export dollars. We gave the iwi these forests, a condition of the transfer, was the replanting of those forests, by iwi. Dairy farming requires much water, so do they believe they now own the rivers which flow through that land.

Because of all the crap information we are showered with, regarding the Treaty of Waitangi, I will include the following.

1845 New Zealand fought a battle against the terrorist Hone Heke at Oaheawai. The Australisians, the British, the Indians, plus Waka Nene fought against him on the side of us New Zealands, June of that year Hone Heke was wounded in the thigh by Whaka Nene, who eventually took on the job as peacemaker and bought about the surrender of Hone Heke. Hone Heke died about 2 years later of tuberculosis. A condition of this surrender was that all those who did surrender could obtain the land they required for their survival. See the cover page. British Sailor's from H.M.S Hazard.

#### OUR TREATY.

Two of the three great principles of Law upon which the second clause of the Treaty was founded.

1 That the uncivilised inhabitants of any country have but a qualified domain over it or a right of occupancy only, and that, until they establish amongst themselves a settled form of government, and subjugate the ground to their own use, by the cultivation of it, they cannot grant, to individuals, not of their own tribe, any portion of it, for the simple reason that they have not themselves any individual property in it.

2 That if a settlement be made in any such country by a civilised power, the right of pre-emption to the soil, or in other words, the right of extinguishing the native title, is exclusively in the Government of that power, and cannot be enjoyed by individuals without the consent of the Government.

They announced their readiness to await with patience, the unfolding of a scheme of the Government in which the best interests of all were involved.

Mr Busby September 1840 Sydney.

Upon the fullest consideration my judgement inclines me strongly to recommend you, and through you, all the members of the Mission, that your influence should be exercised amongst the chiefs attached to you, to induce them to make the desired surrender of sovereignty to Her Majesty.

LL: Bishop Broughton's letter to Henry Williams, Feb 3 1840.

At the signing of the Treaty there must have been 1,500 on the ground, 600 within the tent--chiefs and Europeans, the attendants etc. Not being allowed to enter the same apartment with the masters.

Herald NZ. Journal 1/8/40

Taouui, upon whom the refutation of Manning by the Governor had evidently had marked effect, again rose and said; Lo now, for the first time

my heart has come near to your thoughts. I approach you with my whole heart. You must watch over my children, let them remain under your protection. This is my land to, you must take care of it. But I do not wish to sell it. What of the land that is sold? Can they sit down on it? Can they? Eh?

Tamati Waaka Nene.

As he stepped into the arena of debate, the storms were laid still, and a general calm suppressed the rising excitement, for he was esteemed by the white man and known to his own race as one who dared to fight as well as talk peace. His voice was low at first, no need to raise it high, no sound intruded on it.

I will first speak to us. To ourselves, the natives, said Nene. What do you say? The Governor to return? What then shall we do? Say here to me, O ye chiefs of the tribes of the northern part of New Zealand! How are henceforward to act. Friends! Whose potatoes do we eat? Whose are our blankets? These spears (holding up his taiaha) are laid aside. What has the Nga-Puhi now? The Pakeha's guns, his shot, his powder. Many mounths he has been in our whares: many of his children are our children. Is not the land already gone? Is it not covered, covered with men, with strangers, with foreigners-- even as the grass and herbage--over whom we have no power? We the chiefs, and natives of this land, are down low: they are up high,

exalted, yet they make no slaves. What do you say ? The Governor to go back ? I am sick killed by you. Had you spoken thus in the olden time, when the traders and grog sellers came--- had you turned them away, then you could well say to the Governor, Go Back, and it would have been correct, and I would have said with you, Go Back, yes we together as one man, with one voice. But now as things are, no, no, no. What did you do before the Pakeha came ? We fought, we fought continually. But now we can plant our grounds, and the Pakeha will bring plenty of trade to our shores. Then let us keep him here, let us all be friends together. I am walking beside the Pakeha. I'll sign the pukapuka.

Now let us get back to the local councils. I believe the laws and conditions you have in place at present are sufficient for good counciling operations. It is those in charge, they are incompetent. They appear to be egolocked to the local papers. They appear to spend most of their time trying to put someone down who does not agree with them, suing someone or saying they are going to sue them. This has cost us millions of dollars, however it appears to give their ego a lift. Even when they lose, it is not their money that pays for it.

The flood wall is still not finished, or the sewer, or a untaminated drinking water, neither is the rate proportion they have tacked to our rates, to pay for it, for the last many years. Where is this money, 25 years of interest;

We do not have a reliable water supply in many places on the coast. There is seldom a week goes by without a , MUST BOIL, notice appearing for some West Coast area. The sewerage, Now what I would like to say, I won't. Suffice to say it flows solidely out many pipes where it should not.

Now we have them fightin a loseing battle with the sea. Dumping thousands of metres of fill into the sea, so the sea washes it away; so they can keep dumping more in the same place. They are promoting their operation in the local paper, stating that we have to give them another million dollars or so.

They tell us, According to the local paper they require another million or so dollars to maintain the wharfe we don't owne. They sold all the harbour board land, probably for multipul millions of dollars. Perhaps they are keeping it in their bank to pay themselves redundances when you do your job re the West Coast councils. Perhaps you could offer them a voyage around our harbour and out over the bar, to see how fruitless their efforts are in defying the sea, on that ship they call a dredge, it's no good for anything else and it has cost us millions of dollars I am told.

I wonder how many millions of dollars Councils have spent. From the day that chap Curtis, and others who supported him, stated the Northern tip should not be extended the same distant as the Southern tip, allowing the river to run North with the sea, thus forming a bumper for the lower Cobden.

What have we done, why do you dislike us so much, that you intend to

throw a couple of iwi in the mix we have there now.

Copy to Prime Minister. Leader of the National Party. Governor  
General. Yours Trevor (J.P.) Molloy. *J.P. Molloy SM*  
Local Government Commission. The Press. I will think of others.



# The Originals.

Below • The last Moriori family, showing, on the right of the bottom row, Tommy Bakerman, who died in 1893, the last full-blooded Moriori.



Left • Four Morioris in the seventies. Manali, third from the left, is in Moriori dress, wearing the 'kura' or forehead ornament, a rain cape, and tufts of albatro down in the beard, and carries Moriori quarter-staff. The others are wearing European blankets, as Moriori cloaks of dressed flax fibre.

## No. 16: Ministry for the Environment



PO Box 10382, Wellington 6145  
Website: [www.mfe.govt.nz](http://www.mfe.govt.nz)  
Freephone: 08 00 499 700

17 May 2018

Donald Riezebos  
Acting Chief Executive Officer  
Local Government Commission  
PO Box 5362  
WELLINGTON 6145

Dear Donald

### **Draft West Coast local government reorganisation proposal**

Thank you for your letter of 10 April 2018 to Vicky Robertson advising of the release of a draft local government reorganisation proposal for the West Coast and the opportunity to make a submission.

I understand that the draft proposal is for a combined district plan for the West Coast. This is to be achieved by transferring the responsibilities to prepare and maintain district plans of the Buller, Grey and Westland district councils to the West Coast Regional Council. A joint committee of the four councils and iwi is proposed to oversee the development and approval of the combined district plan. The task of administering the combined plan will remain with each of the district councils.

The West Coast poses particular challenges in terms of its isolation, the length of coastline, the low rate payer base. The resource management issues it faces are significant and any options that will make it easier for councils to pool resources and expertise should offer considerable benefits.

The proposal to achieve a combined district plan by way of formally transferring the district councils plan making functions to the regional council is a significant step. The oversight of the regional council in the preparation of the combined district plan offers potential benefits in terms of integrated resource management. However the success will depend on the extent to which the councils are willing partners in this approach.

It will also be important that any combined plan making process will allow for tailored provisions to protect the special characteristics of communities and environments that make up the West Coast.

While I do not wish to make any further comments on the Commission's proposal, I would like to draw your attention to Ministry work programmes underway which may be of particular relevance to West Coast councils.



Making Aotearoa New Zealand  
the most sustainable in the world  
[www.government.nz](http://www.government.nz)

Firstly, the Resource Legislation Amendment Act 2017 provides for National Planning Standards to be promulgated to provide standard structure, format, definitions and electronic delivery of resource management plans to improve their consistency and usability. All councils will need to reflect these standards in their resource management plans. The draft National Planning Standards will be consulted on in early June and will be approved in their final form by April 2019. These standards will be available to the West Coast councils as they review the content of their district plans.

The recent extreme weather events on the West Coast have highlighted the risks posed by coastal hazards and the need for active management of those risks, recognising the impact of climate change. To assist councils do this, the Ministry has recently released Coastal Hazards and Climate Change: Guidance for Local Government and plans to hold workshop around the country to support councils and communities implement the guidance.

Another challenge the West Coast councils are facing is drinking water supply in the light of aging infrastructure. The Ministry is conducting a review of the National Environmental Standard for Sources of Human Drinking Water. This review is due to be completed in July this year. The Ministry is also providing input into a wider review of the Three Waters Infrastructure (wastewater, stormwater and drinking water) led by Department of Internal Affairs.

A final work area that will be of particular interest to West Coast councils is the work of the Biodiversity Collaborative Group which is looking to make recommendations to the Government on national direction for indigenous biodiversity later in the year.

Once the Commission has considered feedback and issued its final decisions, I would welcome the opportunity for further discussion with the Commission or the implementation team about the timing of Ministry work programmes that may be of relevance to the West Coast councils, as they go forward to develop their planning document or documents.

Yours sincerely



Jo Gascoigne  
Director, Land, Air and Resource Management Practice

## No. 17: Trustpower



21 May 2018

Janie Annear  
Local Government Commission

Via email: [submissions@lgc.govt.nz](mailto:submissions@lgc.govt.nz)

Better together.

Trustpower Limited  
Head Office  
100 Durham Street  
Tauranga  
Postal Address  
Private Bag 12023  
Tauranga Mail Centre  
Tauranga 3143  
Freephone  
0800 87 87 87  
[trustpower.co.nz](http://trustpower.co.nz)

Dear Ms Annear

### Draft Proposal for a Combined West Coast District Plan

Trustpower is one of the nation's largest electricity generator / retailer. Trustpower's New Zealand based generation portfolio derives primarily from renewable energy sources that comprise 19 hydroelectric power schemes spread throughout the country.

Within the West Coast Region, Trustpower owns and operates four hydroelectric power schemes ("HEPS") across two District's as follows:

#### Grey District:

**Arnold HEPS:** The Arnold HEPS is sited on the Arnold River and is fed by Lake Brunner. The station was commissioned in 1932 and has a maximum generation capacity of 3 MW, and an average annual generation output of 25 GWh. This is enough to power approximately 3000 typical New Zealand Homes.

**Arnold Valley HEPS – Consented (but unbuilt) Hydro Scheme:** The proposed Arnold Valley HEPS would provide up to an additional 43MW of generation capacity for the West Coast. This scheme consists of upgrades to the existing dam structure, construction of a new canal and head pond and a new power station. Trustpower continues to assess electricity market conditions and the economic viability of constructing this scheme.

#### Westland District:

**Kumara/Dillmans/Duffers HEPS:** Drawing water from the Big Wainihinihi, Arahura Wainihinihi and Kawhaka catchments, and discharging water to Loopline Lake (Kumara Reservoir), Kapitea Lake and Taramakau River, this scheme has a maximum capacity of 10 MW.

**Kaniere Forks/McKays Creek HEPS:** Located in the Kaniere River catchment, this scheme has a maximum generation capacity of 1.5 MW. Trustpower has resource consent to increase the capacity of this scheme by approximately 1 MW.

**Wahapo HEPS:** Flowing from Lake Wahapo, this scheme was redeveloped on the existing site in 1990, with maximum capacity boosted to 3.1 MW.

These electricity generation facilities play a vital role in ensuring a reliable supply of electricity to the West Coast community.

Against this background, Trustpower has a strong interest in Resource Management on the West Coast.

Trustpower supports the draft proposal to develop a combined West Coast District Plan.

Trustpower enjoys a positive working relationship with the West Coast Councils in whose jurisdictions we operate, and we look forward to participating in any new District Plan process with the Councils.

Yours faithfully,  
Trustpower Limited

A handwritten signature in cursive script that reads "nicola foran".

**Nicola Foran**  
Lead Environmental Advisor – Regulatory

Email : [nicola.foran@trustpower.co.nz](mailto:nicola.foran@trustpower.co.nz)  
Phone: 021 908 951

## **No. 18: Allen Morris**

Submission on draft proposal for a combined West Coast District Plan.

I support the Commissions draft proposal for a combined District Plan for all of the West Coast Councils.

Your proposal embraces the desire for such a combined Plan expressed by the four Councils together with Development West Coast in their joint submission of March 2017 on Alternative Arrangements for West Coast Local Government.

Their submission stated

"Unifying the district plans across the West Coast brings many advantages to the region. Not only will it standardize the regulatory framework creating a more seamless environment to undertake the consenting process within, but it provides further certainty to investors. More importantly the cost of undertaking this, and any potential appeal and court processes, will be minimised. It has also been recognised that there is a lack of resource in the policy space across the District Councils to take individual reviews. This process better utilizes staff capacity across the region and ensures we are able to have in place a fit for purpose District Plan to cater to not only the individual districts, but the region as a whole."

It is pleasing that the Commission has recognised the benefits outlined in that submission and has set out a robust process for achieving that objective.

It is disappointing however, that the decision of the Commission at this time has failed to address the key concerns of ratepayers that prompted the initiation of a move to re-organise the structure of West Coast Local Government arrangements.

i.e. The increasing cost of maintaining four separate Councils. 4 highly paid CEO's 3 Mayors and a Regional Council Chairman, 32 Councillors and more than 120 office bound functionaries to serve a region with a diminishing population of approximately 32,000 people and just 22,000 rateable properties.

This present structure results in a multiplicity of similar functions being carried out separately by three and four Councils to meet management, administrative, regulatory, compliance and governance requirements largely unrelated to the cost effective delivery of core services which are the only need of more than 80% of ratepayers.

There is a concern that during your deliberations too much account may have been taken of the geographic length of the region and too little of the advances made in communication, data processing and on-line servicing technology as well as vast improvement in personell travel and machinery transport capabilities since the previous major reform of Local Government structures 30years ago.

With the vast amount of information that you have assembled and analysed in the course of this process I believe it is incumbent upon you to prepare a model of what the regions Local Government may in future idealistically evolve into. This model should commence with a clean

slate, devoid of historical encumbrances parochial self interest and also without some of the constraints of present legislation in order to provide a bench-mark model that ratepayers may identify with and aspire to when confronted with the inefficiencies and expense of the present structures.

Failure to provide us with something more than the minimilistic proposal for a combined District Plan means that the majority of effort that has gone into this exercise has been largely wasted. Another example of large sums of money being expended to find reasons not to do something. Paralysis by analysis continues to be a feature of so many local government deliberations.

This submission made by  
Allen Morris



**No. 19: Lynda & Chris Reynolds**

Submission re combined District Plan

We oppose the proposal for a combined West Coast District Plan.

We do not believe that there would be any advantage to a combined District Plan. While some savings may be made in some areas, in the long term there would be no advantage as there will be extra costs in the implementation and running costs (eg travel costs etc). The three Districts have very different needs and these would not likely to be met by a single plan.

Lynda and Chris Reynolds





## No. 20: Clare Backes & Keith Moffett

22 May 2018



**Local Government Commission,  
PO Box 5362, Wellington 6140**

[submissions@lgc.govt.nz](mailto:submissions@lgc.govt.nz)

Submission: Draft Proposal for Combined West Coast District Plan

We support the concept of one planning process, to encompass the 3 District Councils and the Regional Council. We feel that this should lead to a better planning process which in turn should lead to better environmental protection. It should result in both a reduced time and cost for businesses and households to be involved in consent applications.

Cooperation between the councils is essential, especially given the small number of ratepayers on the West Coast. Although we would have preferred a unitary Council on the West Coast, this shared planning process could be seen as the first step towards unification.

The draft proposal talks about the problems of trying to have one governing body for the West Coast, which would require another level of local decision making within the main body, such as local Boards. However we think we already have this problem, at least in Westland where the southern ward covers a huge area from Ross to Haast. I think the whole ward system should be rethought.

If a regional rate is struck to pay for a combined plan, then it is important that it is not duplicated in district rates.

We do not wish to be heard in support of this submission.

Clare Backes and Keith Morfett.

## No. 21: Forest & Bird, West Coast Branch

ROYAL FOREST & BIRD PROTECTION SOCIETY OF NEW ZEALAND INC

From West Coast branch  
Chair Kathy Gilbert

22 May 2018

**Local Government Commission,  
PO Box 5362, Wellington 6140**

[submissions@lgc.govt.nz](mailto:submissions@lgc.govt.nz)

Submission: Draft Proposal for Combined West Coast District Plan

The West Coast branch of Forest and Bird support the concept of one planning process, to encompass the 3 District Councils and the Regional Council. Forest and Bird has a particular interest in district plans, as this is the enactment of the RMA process.

From the Department of Internal Affairs website

([https://www.dia.govt.nz/diawebsite.nsf/wpg\\_URL/Services-Other-Services-Whats-in-a-District-Plan](https://www.dia.govt.nz/diawebsite.nsf/wpg_URL/Services-Other-Services-Whats-in-a-District-Plan))

*The Resource Management Act 1991 requires that a District Plan **must** state:*

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

*A District Plan **may** state:*

- *the significant resource management issues for the district;*
- *the methods, other than rules, for implementing the policies for the district;*
- *the principal reasons for adopting the policies and methods;*
- *the procedures used to monitor the efficiency and effectiveness of the policies, rules, or other methods contained in the plan;*
- *the environmental results anticipated from the implementation of those policies and methods;*
- *the processes to be used to deal with issues that cross territorial boundaries;*
- *the information to be included with an application for a resource consent; and*
- *any other information for the purpose of the territorial authority's functions, powers, and duties under the Resource Management Act.*

*The District Plan **must** also give effect to any national policy statement or any New Zealand coastal policy statement and must not be inconsistent with:*

- *a water conservation order;*
- *a regional policy statement; or*
- *a regional plan for any matter specified in section 30(1) of the Resource Management Act (functions, powers, and duties of local authorities).*



The small size of each of the District Council's rating base, and thus the resources that can be used in the planning process, means that it is difficult for the individual Councils to cover all of these aspects. For instance none of Councils have identified significant indigenous vegetation sites adequately in our view, have limited resources available to ensure compliance monitoring and enforcement and are limited in what they are able to offer landowners by way of non-statutory and complimentary measures to ensure the maintenance and enhancement of indigenous vegetation and significant habitats.

It is very important to take a fresh look at the District Plans and we think this combined approach will allow that to happen, rather than just each of the current Plans having minor adjustments. It should be possible to employ skilled planners who have expertise in this area.

Plus when there are changes at the national level they will only have to be incorporated into one plan, not three.

This combined approach should herald more cooperation between the 3 territorial authorities, which will be of benefit to all the rate payers on the West Coast. It will also allow iwi to partake in the process, and the residents of the West Coast can make one submission covering issues throughout the region.

One would hope that compliance and monitoring of consents would become more streamlined and effective with just one plan – the standards would be understandable and acceptable throughout the region.

A hub that combines resources and avoids duplication could go some way towards properly protecting the natural values and allow councils to have planning documents that are consistent and fit for purpose.

However we believe that is only a stepping stone on the way to a unitary Council. We accept the reasons given by LGC for not suggesting a unitary Council at the current time.

Kathy Gilbert  
Chair West Coast Forest and Bird

## No. 22: Paul Scanlon

The One District plan proposal is deeply concerning to me. I have yet to actually see any evidence regarding how cost savings will actually occur. In fact I don't believe there is any.

The consequences of forcing a ODP are likely to be very costly on rate payers and will be quite significant. One of the big advantages trumpeted is that the costs associated with legal challenges will be shared but this also means that some Districts would have to pay for costs that are nothing to do with them.

The cost is prohibitive for our community and the time needed to go through this process of developing One District plan would put great pressure on our already lean staff.

Would it not make more sense for the three Districts to use the one template so plans are aligned but would still allow for the differences as well?

Councils are already working on developing shared services and once templates are aligned this may highlight the opportunity for more services to be shared.

The development of the rules around a ODP is intriguing. What rules do you use? From what District? You should not overlook the fact that different rules in different Districts have not come about by accident. These rules, that are different in each District, have been considered the best and most practicable for the District that they are in. Because of the psychographics and geographical location of the Councils it makes more sense to look for other ways to save money like templating work streams.

**Each District should have its own autonomy. Elected representatives should have the right to decide our needs and values as our community.**

Regards,  
Paul Scanlon

## No. 23: West Coast Regional Council



THE WEST COAST  
REGIONAL COUNCIL

388 Main South Rd, Paroa  
P.O. Box 66, Greymouth 7840  
The West Coast, New Zealand  
Telephone (03) 768 0466  
Toll free 0508 800 118  
Facsimile (03) 768 7133  
Email [info@wcr.govt.nz](mailto:info@wcr.govt.nz)  
[www.wcr.govt.nz](http://www.wcr.govt.nz)

23 May 2018

Local Government Commission  
PO Box 5362  
Wellington 6140

Dear Sir/Madam

### **Submission on Draft proposal for combined West Coast District Plan**

Thank you for the opportunity to submit on the Draft proposal for a combined West Coast District Plan.

#### **Areas of support**

The West Coast Regional Council (WCRC) generally supports the combined proposal. The advantages detailed in the proposal of combining resources to create one district plan through the use of specialised staff will be of benefit to the entire region. The reduction in the number of planning documents on the West Coast will provide greater clarity, consistency and ease of use for our communities and businesses. It may also be an incentive for outside companies considering doing business on the West Coast. Further benefits will be less cost and time for submitters when plans are periodically reviewed. The potential exists for the National Planning Standards and any future national directions to be implemented more efficiently. As the regional council is the most familiar with the regional plans, there is the opportunity to work collaboratively with the district councils to ensure consistency across all planning instruments on the West Coast. Te Rūnanga o Makaawhio and Te Rūnanga o Ngati Waewae will also be able to participate more efficiently in the planning process.

The proposed structure of the West Coast District Plan Committee and Transition Board appears to give a reasonable balance between the councils, and ensures Poutini Ngāi Tahu are also involved in the decision making process. The appointment of the chairperson by the Transition Board is supported for the same reasons. This ends our submission. We would be happy to answer any questions about our submission.

The contact for service is: Edith Bretherton, Senior Policy Planner

Ph: -03 768 0466 x8275 Email: [edithb@wcr.govt.nz](mailto:edithb@wcr.govt.nz)

Yours faithfully

Lillie Sadler

**Planning Team Leader**  
**WEST COAST REGIONAL COUNCIL**

## No. 24: Buller Electricity Ltd



Buller Electricity Limited

24 Robertson Street P O Box 243 T +64 3 788 8171

Westport 7825 Westport 7866 F +64 3 788 8191

New Zealand New Zealand E info@bullernetwork.co.nz  
W www.bullerelectricity.co.nz

24 May 2018

Local Government Commission  
P O Box 5362  
WELLINGTON 6140

Via email: [submissions@lgc.govt.nz](mailto:submissions@lgc.govt.nz)

Dear Commissioners

### **Draft proposal for combined West Coast District Plan**

I would like to make the following submission on behalf of Buller Electricity Ltd (“BEL”). We are the local electricity lines company servicing most of Buller District, from Karamea to Meybille Bay. We are a Consumer-owned Trust, with approximately 4,600 consumer connections on our network.

We have concerns about the proposed combined West Coast District Plan and are not in favour of this idea. We believe that such a move would not be in the best interests of Buller residents and would significantly diminish their voice. The attitude and approaches in the different regions of the West Coast towards mining, tourism, and infrastructure needs along with other key economic segments and opportunities are quite rightly different, and it is not clear how a unified planning approach may provide a better service and outcomes for Buller.

We are also not convinced and see no evidence in the proposal documentation for how efficiencies in the planning approach would arise from what amounts to a centralization of this function. There will be significant cost involved in setting up a centralized planning function as the Local Government Commission have themselves highlighted. Centralization of planning does not automatically result in lower overall costs for the combined entity. In fact, moving from a decentralised to a more centralised function can often result in a higher overall cost, and the planning can be quite disconnected from the local aspirations, local needs and realities on the ground. We see nothing in the proposed documentation to address the specific mechanics of how such issues would be avoided.

If it were implemented, this planning approach would take several years to embed and get operational, yet there would be setup and carrying costs associated with the change virtually from Day 1 with the appointment of the transition body, etc. Under a unified District Plan, Buller would also be open to the possibility for paying towards any challenges that arise, but which may have no direct impact of relation to our District. We would also have no mechanism via elected representatives to change anything arising from the centralized planning function. We also believe our local Buller District Council has far more important matters to focus on, and they are better to employ their limited resources to focus on these higher priority issues without a major change such as this running in parallel.

We understand that the Grey and Westland District Plans are due for review, but they have not started yet. Conversely, Buller is in the final stages of deliberation to release their District Plan. To now consider creating a unified version may suit the Grey and Westland areas, but it penalises Buller for getting on with the job ahead of the others, and would mean considerable waste of cost, time and effort for the Buller District Council, businesses such as BEL and ratepayers.

BEL has spent considerable time and effort contributing towards a Plan Change that ensures district rules better reflect what we seek from the regulations with regards to electricity infrastructure needs, and we have picked the best pieces from the Grey and Westland District plans for inclusion to the Buller District plan. While these changes are still undergoing the final stages of deliberation, we are reasonably confident we will get the required changes we want. It makes no sense to throw further future uncertainty around this important regulatory aspect of our business at this late stage of the process.

Our Councillors have been considerate and careful but by no means averse to rule improvements and the efficiencies that they can provide to BEL. However, despite this openness, the process has still been a cumbersome and time-consuming one. I believe that a move to a Combined West Coast District Plan can only make matters worse in this regard. Centralization would further reduce the flexibility and responsiveness of the District Plan and plan change process. Our locally elected Councillors are unlikely to be able to play a significant role in steering local changes as needs arise as they will only represent one district among three. Centralization would rob autonomy from each district and extend a process that is already mired in red tape despite the best intentions of those involved.

Finally, we believe that local ownership and drive is important for Buller to achieve the social and economic aims of our Community, and that all starts with a local plan.

Yours faithfully



Eamon J Ginley  
Chief Executive  
For and on behalf of  
Buller Electricity Limited



## No. 25: Buller District Council

24 May 2018

### Submission to the Local Government Commission – Draft Proposal for combined West Coast District Plan

#### By E-mail

To: Local Government Commission  
PO Box 5362  
Wellington 6140  
E-mail: [submissions@lgc.govt.nz](mailto:submissions@lgc.govt.nz)

From: Buller District Council  
PO Box 21  
Westport 7866

Contact: Deputy Mayor Graeme Neylon  
Chair – District Plan Review Committee  
E-mail: [graeme.neylon@bdc.govt.nz](mailto:graeme.neylon@bdc.govt.nz)  
Phone: 03 732 8382

#### INTRODUCTION

1. This is a submission on all aspects of the draft proposal for combined West Coast District Plan dated April 2018.
2. The Buller District Council (BDC) is committed to working collaboratively with the other West Coast Councils in shared services. To date we have made progress in the following areas:
  - Waste Minimisation & Management Plan – to meet Ministry for Environment statutory review by June 2018 (West Coast – Buller, Grey and Westland)
  - Roading Activity Management Plan – aligned to NZTA One Network Road Classification business case requirements – (West Coast – Buller, Grey & Westland)
  - One window project for mining consents
  - Information Technology – including phones and information management
  - Building Consents through the Alpha One System
  - Civil Defence
  - Working towards a shared HR and Health & Safety resource.

3. BDC acknowledges that the LGC has discarded the Unitary Authority option and we agree with their rationale in making that decision.

## **SUBMISSION**

4. BDC opposes the establishment of a combined West Coast District Plan.
5. Contrary to the information that may have been received by LGC and that is presented in the LGC draft proposal, BDC has never been in favour of a combined plan for the whole of the West Coast.
6. Following the BDC meeting of February 2017 miscommunication has occurred between what was conveyed in the joint submission made to LGC by the BDC, Grey District Council, Westland District Council and West Coast Regional Council and the intent understood by BDC. LGC has been informed of this situation on a number of occasions.
7. As noted in the Martin Jenkins Report on the various proposals explored, the combined District Plan shows that there is no economic benefit over the seven year period presented in the report. Further, it clearly indicates that our community could incur an additional financial burden, as set out in table 35, page 44 of the report of negative \$184k at Net Present Value. In our view this contradicts the statement made in the draft proposal that 'the West Coast combined district plan proposal can be expected to have a lower overall cost to West Coast ratepayers'.
8. Much has been discussed regarding the cross-boundary issues being a disincentive for investors, however BDC has not found this to be the case over the life of the Buller District Plan.
9. The Case Study referred to in the draft proposal is in respect to the Punakaiki master plan and claims that the proposal would support effective implementation of the master plan. We submit that the Punakaiki master plan is subject to working collaboratively with a wide range of stakeholders, in many cases each with their own working plans; this has not been identified as an issue. We therefore see no significant other benefits in reverting to a combined District Plan.
10. There are fundamental differences in the current District Plans, for example activities regarding mining and indigenous vegetation clearance. We believe that if the plans were combined this could potentially result in long drawn out mediation and potentially court appeals.
11. It is our understanding that the proposed combined District Plan will have sections of the Plan being district specific, we therefore submit that this is no different to having individual district plans and that the status quo should remain.
12. Local Government New Zealand is currently promoting localism and we submit that the combined District Plan proposal is discarding this. The West Coast is geographically and culturally diverse and covers a vast geographic area. The proposed combined District Plan will result in a loss of local decision making and access for our communities in being able to partake in the District Plan review process.

13. We disagree with the LGC definition of demonstrable support and believe that it fails to align with the BDC acceptable threshold used in our own decision making process when considering submissions made to our LTP, Annual Plans and other consultation processes.
14. We note that The Ministry for the Environment are currently working towards public notification of the draft first set of National Planning Standards (i.e. the district plan template) in June 2018. We submit that once these standards are in place Districts will have clear guidelines as to the standard requirement in their District Plans and this will assist the users, thus eliminating the need for a combined District Plan.

## **OUR POSITION**

15. We support the Boffa Miskell low level changes (A) & (B), as set out in their report on page 22.

### **Low level change (A):**

Retain separate regional and district plans and separate regional and district teams, but at a district level develop as matter of good practice:

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

### **Low level change (B):**

In addition to the above, agree at the district level to have:

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

16. As BDC has progressed the review of its current District Plan, we are prepared to offer support to other West Coast Councils, which we are willing to discuss further with LGC.
17. We confirm that we wish to be heard at the Hearing to be conducted at the Pulse Energy Recreation Centre on 30 May 2018.

## No. 26: Te Rūnanga o Ngāti Waewae



25 May 2018

Local Government Commission  
PO Box 5362  
WELLINGTON 6140

Emailed to: [submissions@lgc.govt.nz](mailto:submissions@lgc.govt.nz)

Tēnā koe,

### **RE: Draft proposal for combined West Coast Tai Poutini District Plan**

Thank you for your letter dated 9 April 2018 regarding the release of your draft West Coast local government reorganisation proposal.

Te Rūnanga o Ngāti Waewae understands that the proposal would see the establishment of a Joint West Coast District Plan Committee, comprising Buller, Grey and Westland district Councils, West Coast Regional Council, Te Rūnanga o Ngāti Waewae and Te Rūnanga o Makaawhio, to be responsible for preparing and approving a new combined district plan for Tai Poutini/the West Coast. This would follow the transfer of the legal obligations of the three district councils to prepare and maintain a district plan under the Resource Management Act 1991 to West Coast Regional Council, with delegated power to prepare and approve the combined plan then given to the Joint West Coast District Plan Committee.

Te Rūnanga o Ngāti Waewae is very supportive of the overall proposal. The takiwā of Ngāti Waewae is such that currently we need to participate in plan development and review processes in all three districts. The proposed combined district plan approach will reduce the number of resource management processes our rūnanga needs to be involved in and will ensure a unified planning approach across the entire Tai Poutini. We are also very supportive of the Joint West Coast District Plan Committee which we understand will ensure that district plan development and decision making occurs in partnership with Ngāi Tahu.

The following responses relate to the specifics in the legal description provided in the consultation material.

#### ***Transfer of statutory obligations***

1. Te Rūnanga o Ngāti Waewae supports the obligations of Buller, Grey and Westland district councils to prepare, maintain, and periodically amend and review a district plan being transferred to the West Coast Regional Council.
2. Te Rūnanga o Ngāti Waewae supports the West Coast Regional Council delegating its transferred district plan obligations to a joint West Coast District Plan Committee.

#### ***Provisions for inclusion in reorganisation scheme***

3. Te Rūnanga o Ngāti Waewae supports the reorganisation scheme to include a mandatory joint committee and a technical advisory team. For completeness, Te Rūnanga o Ngāti Waewae seeks that the legal description in 3(a) is amended to also refer to Te Rūnanga o Ngāti Waewae and Te Rūnanga o Makaawhio in addition to the four West Coast councils.

#### ***West Coast District Plan Committee***

4. Te Rūnanga o Ngāti Waewae supports the purpose of the West Coast District Plan Committee.
5. Te Rūnanga o Ngāti Waewae supports the committee including a representative appointed by Te Rūnanga o Ngāti Waewae and a representative appointed by Te Rūnanga o Makaawhio.

#### ***West Coast District Plan Technical Advisory Team***

6. Te Rūnanga o Ngāti Waewae supports the appointment of a technical advisory team to provide technical advice to the West Coast District Plan Committee.
7. Te Rūnanga o Ngāti Waewae requests that the technical advisory team includes a representative with experience in incorporating Ngāi Tahu values into a resource management plan. This person would be appointed by Ngāi Tahu.

#### ***Affected local authorities continue in existence***

8. Te Rūnanga o Ngāti Waewae is supportive of the four councils continuing in existence.

#### ***Transition body***

9. Te Rūnanga o Ngāti Waewae is supportive of a transition body being constituted to make arrangements.
10. Te Rūnanga o Ngāti Waewae supports who the transition body will comprise of.

#### ***Transition board***

11. Te Rūnanga o Ngāti Waewae supports the transition board including a representative appointed by Te Rūnanga o Ngāti Waewae and a representative appointed by Te Rūnanga o Makaawhio.
12. Te Rūnanga o Ngāti Waewae supports the role of the transition board.

Te Rūnanga o Ngāti Waewae does not wish to be heard in support of our response at the upcoming hearings, however the Local Government Commission is welcome to contact me via phone on 021425229 or via email at [francois@ngatiwaewae.org.nz](mailto:francois@ngatiwaewae.org.nz) at any time regarding our response.

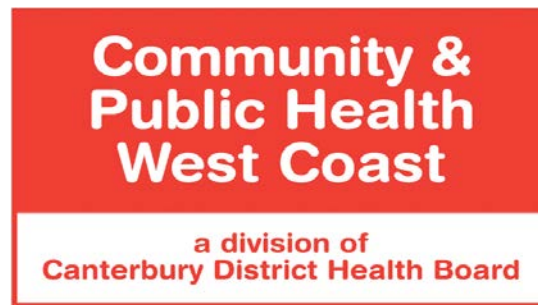
Nāku noa, nā

A handwritten signature in blue ink, appearing to read 'Francois Tumahai', with a stylized flourish at the end.

Francois Tumahai  
Chairperson  
Te Rūnanga o Ngāti Waewae

cc Te Rūnanga o Makaawhio, PO Box 181, Hokitika 7842  
Te Rūnanga o Ngāi Tahu, PO Box 13-046, Christchurch 8041

**No. 27: Community and Public Health, West Coast**



**Submission on  
Draft proposal for combined West Coast District Plan**

**May 2018**

**To: Local Government Commission**

**Submitter: Community and Public Health, West Coast**

## **Details of Submitter**

Dr Cheryl Brunton

Medical Officer of Health

### **Postal Address**

Community and Public Health

PO Box 443, Greymouth 7840

3 Tarapuhi Street

Greymouth

### **Contact Person for this Submission:**

Freedom Preston

West Coast Team Leader

Community and Public Health

**DDI:** 03 768 1170

**Email:** [freedom.preston@cdhb.health.nz](mailto:freedom.preston@cdhb.health.nz)

Please note we do not wish to speak to this submission.



## Background

Community and Public Health West Coast is a regional office of the Community and Public Health Division, Canterbury District Health Board and provides a regional public health service to the West Coast. We welcome the opportunity to comment on the Local Government Commission's proposal to combine the West Coast District Plans.

The goal of our organisation is that of improving and protecting the health and well-being of the people of the West Coast. However, while health care services are an important determinant of health, health is also influenced by a wide range of factors beyond the health sector.

The Dahlgren and Whitehead 1991 model below illustrates how individuals are influenced by factors that generally lie outside their control. These factors, often referred to as the social determinants of health and well-being, can be described as the conditions in which people are born, grow, live, work and age; they are affected by environmental, social and behavioural factors.

As depicted in the diagram, the sphere of influence is very wide; furthermore changes in any of these areas can affect health and wellbeing dramatically (both positively and negatively). In order to maximise people's wellbeing, these factors need to be taken into account by policy and decision makers including councils.



## Our submission

Local government is one of the most important and powerful influences on the health and wellbeing of communities. The decisions that local authorities make about land and transport use and the built and natural environment significantly affect health as do the myriad of other activities that many local authorities currently undertake to support the environmental, cultural and social wellbeing of their populations.

We acknowledge the existing challenges for our councils which are required to provide a range of services, including planning and resource management across a vast area with a small population rating base. The current arrangements do not provide either the best value for money or the best use of existing expertise within our councils.

We agree with the Commission that it makes sense for the three West Coast district councils to pool their resources and join with the West Coast Regional Council to develop a combined district plan that suits their common needs but allows for local variation.

As an organisation, we regularly engage with all four West Coast councils on planning and resource management issues, as well as addressing subsequent problems that may arise out of decisions about planning and resource management. From our perspective, there is much to be gained from simplification of and improvements to the planning and resource consent processes, greater consistency of rules and operations Coast wide, and more efficient use of the existing planning resources within councils.

It would also be easier to deal with public health issues, such as safe drinking water, safe disposal of waste water and waste management, with a single district plan to ensure that a consistent Coast-wide approach is taken. The current situation means that there can be inconsistencies between regional and local rules which can have adverse impacts on public health.

Finally, we strongly support the inclusion of local iwi in the proposed joint committee to oversee and approve a single district plan. Section 8 of the Resource Management Act refers to the principles of the Treaty of Waitangi. We believe that the inclusion of local iwi on the joint committee would demonstrate that local government on the West Coast is actively committed to these principles. Kaitiakitanga is also explicitly recognised in the Act and this proposed arrangement allows for it to be exercised to a greater extent than at present.

**CPH supports the Local Government Commission's draft proposal to transfer the obligations of the Buller, Grey and Westland District Councils to prepare and maintain a district plan under the Resource Management Act 1991.**

**CPH also supports the establishment of a joint committee, comprising representation from the regional councils and local iwi, to be responsible for preparing and approving a new combined plan.**

Thank you for the opportunity to provide feedback to this issue. We do not seek to speak to the committee in further support our submission.

<p>We are aware that this submission will be released on the government website and have noted the Official Information Act and privacy considerations that apply</p>
---

## No. 28: Phil Rutherford

Friday 25 May 2018

### Submission to the Local Government Commission – Draft Proposal for combined West Coast District Plan

By E-mail

To: Local Government Commission  
PO Box 5362  
Wellington 6140  
E-mail: [submissions@lgc.govt.nz](mailto:submissions@lgc.govt.nz)

From: Phil Rutherford



### INTRODUCTION

1. This is a submission on the draft proposal for combined West Coast District Plan dated April 2018.
2. The submission is made by myself as a resident and ratepayer of the Buller district.
3. The submission only considers the proposal as it may affect residents and ratepayers of the Buller district and does not consider aspects of the proposal as may affect the other communities included in the draft proposal – i.e. the communities of Grey and Westland districts.

### SUBMISSION

4. I oppose the establishment of a combined West Coast District Plan.
5. I do not believe that what the LGC describes as 'demonstrable support' for some type of change can be applied to community of the Buller District. In fact as demonstrated by the Commission's own published data support for change from within Buller is markedly low.
6. I can find no evidence in the proposal that would show that the community of Buller would be better off. Rather it would seem that the proposal may in fact have a negative outcome for our district – particularly from a financial perspective.
7. As noted in the Martin Jenkins Report on the various proposals explored, the combined District Plan shows that there is no economic benefit over the seven year period presented in the report. Further, it clearly indicates that our community

could incur an additional financial burden, as set out in table 35, page 44 of the report of negative \$184k at Net Present Value. In my view this contradicts the statement made in the draft proposal that 'the West Coast combined district plan proposal can be expected to have a lower overall cost to West Coast ratepayers'.

8. The Buller District has a District Plan that has been compiled by the community for the community and there has not been any call (that I am aware of) for a combined Regional District Plan.
9. The Case Study referred to in the draft proposal is in respect to the Punakaiki master plan and claims that the proposal would support effective implementation of the master plan. I submit that the Punakaiki master plan is subject to working collaboratively with a wide range of stakeholders, in many cases each with their own working plans (for example the Department of conservation); this has not been identified as an issue. I therefore see no significant other benefits in reverting to a combined District Plan.
10. There are fundamental differences in the current District Plans, for example activities regarding mining and indigenous vegetation clearance. I believe that if the plans were combined this could potentially result in long drawn out mediation and potentially court appeals.
11. It is my understanding that the proposed combined District Plan will have sections of the Plan being district specific, I therefore submit that this is no different to having individual district plans and that the status quo should remain.
12. I do not wish to be heard at the Hearing to be conducted at the Pulse Energy Recreation Centre on 30 May 2018.

Yours sincerely  
Phil Rutherford

A handwritten signature in black ink, appearing to read 'P. Rutherford', is written on a light-colored rectangular background.

## No. 29: Jimmy Costello

Combined West Coast District Plan.

Submission to Local Government Commission. May 2018.

From Jim Costello, [REDACTED]  
[REDACTED]

Kia Ora Tatou,

I am fully in favour of a combined District Plan for the whole of the West Coast as outlined in your draft proposal. It has a lot of advantages as outlined in your brochure and the disadvantages are not insurmountable. It makes a lot of sense and although I would like to see the amalgamation of all the West Coast District Councils at least this is a step in the right direction. If the Buller Council continue to demur from the suggestion of a combined district plan, then I hope the other two district councils will still take up your suggestion and combine their plans. The only problem for me is that I live near the border of the two councils to the north and on the northern side of the border in the Buller District.

It is a fact that most of the ratepayers in Punakaiki, although small in number, pay a disproportionately large amount of rates to the Buller District Council compared with some of our lucky neighbours and other ratepayers further north. Thus, it is extremely annoying that when the Buller Council are given the opportunity, with government funding thrown in, to ease or at the very least maintain the rate burden at its present level in future years they spurn it for some bizarre parochial reason.

Living in a border town like Punakaiki where residents have to deal with two district plans depending on whether you live north or south of the river highlights the stupidity of the present arrangement. Any change in our present system that allows more efficiencies and in the long run less costs is to be applauded and I am at a loss to understand the stance of the Buller District Council.

Many thanks for the opportunity to comment and may God bless you all in your decision-making.

Jimmy Costello,  
Punakaiki.

[REDACTED]

---

**No. 30: Punakaiki Promotions Group**

**SUBMITTERS: PUNAKAIKI PROMOTIONS GROUP [PPG]  
SUBMISSION TO: LOCAL GOVERNMENT COMMISSION  
SUBJECT: DRAFT PROPOSAL FOR A WEST COAST DISTRICT PLAN  
25<sup>th</sup> May - 2018**

Andrew Beaumont  
[REDACTED]

Richard Arlidge  
[REDACTED]

**Background**

Punakaiki Promotions Group is an Incorporated Society that promotes tourism related businesses on the Coast Road from Nine Mile in the south to Charleston in the north. There are currently 31 members/enterprises. Six members are located in the Grey District and 25 are located within the Buller District. To understand more about the entity and the enterprises involved visit [www.punakaiki.co.nz](http://www.punakaiki.co.nz)

The Coast Road (Nine mile to Whitehorse Hill) has 850 plus commercial beds available (including camp sites) plus several unmonitored freedom camping sites. Many of the Airbnb accommodation units that have and are being developed are at levels that do not require Resource/Planning consent.

The Coast Road visitor experience is one of beaches, bush, birds and rivers – with geology, botany, landscape and seascape. From Nine Mile/Motukeikei in the south to Charleston in the north there are:

- Eighteen beaches to explore....with dolphins seals, sea birds and the occasional whale observed
- Seven plus rivers to walk/ride and explore

This landscape enables:

- Cave rafting, adventure caving, canoeing, paddle boarding, horse riding, jade carving, knife making, stargazing, walking, fossicking, tramping, back country wilderness tours, mountain biking, rock climbing, fishing and swimming.

**Population**

There are 75-100 people resident in the wider area during the winter months and 1000 – 1300 people living and staying through the height of summer.

## **Our perspective**

The Punakaiki and Coast Road are experiencing the impacts of Climate Change and sea level rise. We have been asked by the LGC to comment on a Draft Proposal for a West Coast District Plan.

At present Punakaiki residents and businesses deal with six separate entities which are BDC, GDC, WCRC, DOC/Crown, Ministry of Transport/NZTA and Land information NZ (LINZ). Under the Draft Proposal we would still be dealing with all the above.

## **A Future Local Government arrangement for the West Coast**

We think the LGC has got the process and recommendations upside down and back to front. We do not want a more powerful WCRC and more complicated planning and democratic process with the WCRC creating the plan and the BDC & GDC implementing. The WCRC rates will increase and The District Council rates will not decrease. We want freedom from bureaucracy and lower rates.

The Punakaiki Promotions Group have decided that our preferred option for the reorganization of the West Coast is for the Grey and Westland Districts to be combined and form a unitary authority and the Buller District to remain as is and become a unitary authority and the WCRC to be dissolved. This would result in the reduction from four Councils to two and cost a lot less to administer and be a big saving for many ratepayers.

## **Why**

The bulk of the West Coast population lives within a 30km radius of Kumara Junction. There are currently three councils operating within 40km of each other.

We propose that Punakaiki ratepayers (in both the Buller and Grey Districts) will have the option of forming an autonomous self-managing zone (PAZ) that will be a new stand-alone entity we will not pay rates to the BDC or the new combined ,GDC & WDC.

The West Coast is not "*crying out for development*" we can only assume that the LGC is desperate to make the WC look like the rest on NZ – a landscape with too few lovers, where the native vegetation has been stripped away to make way for the planting of rye grass and the worshiping of sheep and dairy cows. We note you like pictures of cows with mountains behind in your brochure (x2) but would you drink/or swim in the river behind?

Punakaiki residents are wanting less development. There are new businesses and employment opportunities evolving all the time as people are adapting to this beautiful environment and a new digital era economy.

**Our proposal would:**

- create two unitary councils and possibly the Punakaiki Autonomous Zone (PAZ)
- result in two district plans that would be similar but different where required.
- recognise the distinct character of different areas (especially the Buller) by allowing for local variations
- leave responsibility for administering the new districts with the two unitary councils.

**Why has PPG decided on this option?**

As a result of observing the performance of the current West Coast councils in recent years we see the need for a re-organization that is meaningful and provides certainty for future West Coast local government arrangements. The major issue confronting West Coast communities now and into the future is **CLIMATE CHANGE**.

**We see:**

- some physical isolation but electronically connected to the wider world and we are the destination of many
- the large bulk of the population is concentrated in two separate and distinct areas Greymouth/Hokitika 2/3 and Westport/Reefton 1/3.
- there are small populations outside these groupings in far flung pockets that make up less than 10% of the total West Coast population.
- That Haast should be given the option of join the Lakes District Council or becoming the Haast Autonomous Zone (HAZ).
- approximately 85 per cent of the area being in Crown ownership (primarily Department of Conservation estate) and the Crown does not pay rates on this land but may yet pay a Carbon Capture dividend.
- The two new councils will work just fine one will be medium size and the other small but small is beautiful.
- Westport and Buller wants to continue defining their own destiny – so let them.
- Reefton resident should be given the option of joining Grey/Westland unitary council or staying with the BDC.

**The gains include:**

- significant savings in providing infrastructure services such as water and roading as the decision making will be locally focused on the big issue which is sea level rise and climate change.
- a consistent representation for each distinct that is capable of addressing the issues confronting them.
- higher quality services generally which would be of benefit to businesses and households as decision making would be local by people known to the community and connected.



The new requirements relating to iwi participation in resource management and decision-making processes under the RMA will be able to be absorbed into the two new Councils – we are sure they will cope.

### **How would two unitary councils benefit the West Coast?**

We see two separate unitary councils as having significant benefits for the West Coast including:

- simplified and consistent planning processes within each unitary council for new business activities, residential development and the subdivision of land
- be focused on local knowledge and be able to respond to the impacts of climate change and sea level rises
- reduced time and cost for businesses and households to be involved in consent applications as each base would be local from a single entity.
- providing relevant rules for the operation of industries and services including the mining industries, tourist facilities and network utilities such as electricity and telecommunications that is pertinent to the local situation
- each unitary council would be a one stop shop for information representation and decision making
- being a more efficient way to incorporate national directions on responses to climate change and the requirement to work with iwi
- greater ability for these two unitary councils to attract and retain suitably qualified and experienced staff in the specialty area of climate change response, resource management planning with its increasing demands.
- under this arrangement all the staff would not be located in the Greymouth area so a great deal less time involved in travel and meetings.

Achieving the sustainable response to climate change, management of local resources – providing for appropriate development and environmental protection – will be the priority of this new two unitary council solution. This will promote and safeguard the area's prosperity into the future through the location of a range of employment and income generating activities.

We note the West Coast will remain a top tourist destination whatever local government arrangements are made. Local government arrangements do not usually feature on any international visitors area of interest.

**The Two District Plan Costs** The RMA will require the two new unitary Council's district plans be reviewed, in whole or in part, every 10 years. We are sure they will be able to cope and we are sure they will be able to work it out. Having just two plans will make it much cheaper and simpler because each one will be site specific, conditions and people specific and we are sure we could find a consultant who would agree.

The two new district plans can be expected to have a lower overall cost to ratepayers due to efficiencies such as:

- jointly hiring outside technical advice where required
- consulting parties with region-wide interests twice rather than four times at present
- two separate and independent submissions and hearings process with much less travel and time wasted
- two separate review processes to deal with amendments and variations to the plan that may develop a common path.

The benefits to the West Coast economy can be expected from regionally specific sets of planning rules in each council resulting in lower compliance costs for a wide range of West Coast businesses and households.

If central Government/LGC think a 'One Plan Fits All' approach to the RMA is good for the West Coast why not do this for the whole of the South Island?

### **Funding options:**

We prefer that each of the two Unitary Councils generate their rates over their region to fund their operations. With just two entities the sharing of services will be much simpler and as has been shown in the past it does work but takes time. PAZ would operate at half the levels of rates we currently send to the Buller District.

### **CASE STUDY: PUNAKAIKI**

*Punakaiki faces several major challenges due to the growth in tourism, and \$100,000 was awarded from the Provincial Growth Fund in February 2018 to help to develop a master plan to assist with planning. Nothing can be future-proofed. The sea levels are rising!. The biggest issue/challenge particularly at Punakaiki is Climate Change and sea level rise that can be observed in action all along the Coast Road.*

We are now in a situation where we will be constantly throwing rocks at the rising ocean. We will need to make our own decisions and enact them with haste if we are to sustain our economy. Dealing with BDC then WCRC and having to bring along the GDC is all part of the problem. Under the LGC proposal we would still be dealing with six separate entities at Punakaiki.

If the GDC – BDC boundary is really the issue then the LGC could shift the boundary between the two councils south by 8km to Waiwhero Creek so that greater Punakaiki would be managed by one single council. But it is not the issue. The land south of Punakaiki river is particularly sensitive. The northern area of the Barrytown Flats from Waiwhero Creek to Razorback Point is predominantly a very low lying partially drained wetland that will be highly vulnerable to sea level rise in the near future. The hills east of SH6 are the only home to the unique, rare and endangered Tāiko (Westland Petrel). Much of the land is in Nature Reserve and National Park. The GDC began a SNA process under the RMA in 2014. This is on hold until a new District Plan Review is undertaken. No development required nor should any be encouraged.

### **With the creation of Autonomous Zones:**

- the rules for specific activities in the area would be considered by the local community giving more certainty to new and existing businesses and residents on adaptation to climate change and sea level rise.
- minimising the risk that the master plan finding would be implemented differently on different sides of the Punakaiki river.
- residents and businesses would maintain and develop new relationship with their own local entity and the two unitary councils to the north and south of us.

We are in favour of a move back to the principles of Small is Beautiful as espoused by Ernst F. Schumacher. With modern technology of mobile phones and cloud storage the administration of Punakaiki Autonomous Zone would be achieved without the need for a clumsy and dis-engaged distant bureaucracy.

We believe that smaller is better. The recent findings by Dr Oliver Hartwich the executive director of the NZ Institute found that the Swiss model of local government which has one of the most decentralised systems of local government in the world consists of about 2300 councils over an area roughly the size of Canterbury and a population of about 8.4 million.

"Any changes to local government set-up in New Zealand to make us a little more Swiss would probably give local communities greater say over their local affairs and over their own regulatory affairs. See <https://nzinitiative.org.nz/reports-and-media/reports/go-swiss-learnings-from-the-new-zealand-initiatives-visit-to-switzerland/>.

### **CLIMATE CHANGE DENIAL**

The WCRC has two elected members who refuse to acknowledge the science of Climate Change and ongoing sea level rise. Below is an extract from the WCRC web site of the confirmed minutes of the Resource Management meeting held on 13 November 2017:

*"H. Mills advised that the report on Our Atmosphere and Climate 2017 does require any actions that Council needs to be deal with at this stage. Cr Birchfield stated he will be voting against the recommendation as he does not accept the implications contained in the report. Cr Birchfield stated that the world climate has not been warming for the last 20 years and it has been cooling for 20 years. Cr Birchfield stated that 93% of carbon comes from nature and the other 7% comes from human activity and there is no proof that carbon has any effect on the climate. Cr Clementson stated that he does not believe in sea level rise."*

The people who are in charge of the Coastal Policy Statement and who are there to identify Coastal Hazards (sections 24-27 RMA) are in denial and claiming it is not happening.

Imagine yourself as a person who has purchased a coastal property north of Westport and the ocean has begun to eat away at your section and you ask your

local council (BDC) what you can do about protecting your property and they tell you to deal with the WCRC based south of Greymouth. And you work out who your local representative is on the WCRC and he says he does not believe in sea level rise! How can the LGC suggest the way to deal with planning and risk management in the future when Climate Change is the biggest issue we are facing is by giving a larger role to the WCRC given the level and culture of Climate Change denial within this body.

#### **Other reasons to create the Punakaiki Autonomous Zone:**

- Ongoing issues with the design and delivery of the Punakaiki water supply
- No policing of freedom campers and around Punakaiki by BDC and GDC.
- Two rubbish collections per week one from Greymouth up to the Punakaiki River and one from Westport down to the Punakaiki River
- Punakaiki businesses and residents excluded from using the GDC rubbish dump even though we spend most of our money in Greymouth
- GDC charge Punakaiki residents to join and use their library even though we spend a large amount of our money in Greymouth.
- Excessive overheads for the WCRC management of Punakaiki beach rock wall
- A dis-engaged and bumbling WCRC bureaucracy.
- WCRC invested public funds in economic development in Canterbury

#### **Creating Enterprise**

Bureaucracies are not opportunity creators. Central Government and Local Government do not start new businesses. It is people, communities and businesses who will create the opportunities of the future. We do not need Buller, Grey or the WCRC but they need us. Therefore if there were any services required this would be done on a tender and contract basis such as roads, rubbish collection, water supply, engineering advice or building permits. The difference would be that any other council or private provider would also be able to tender for the work.

We propose the Punakaiki Autonomous Zone would be from Scottsman's Creek in the south to Irimahuwhero Point in the north.(Note this is also the area being considered in the Punakaiki Master Plan). This would be 10km long with circa 200 rateable units currently paying \$400,000 plus in rates per annum.

#### **CLIMATE CHANGE**

**NASA states:** "Sea level rise is caused primarily by two factors related to global warming: the added water from melting ice sheets and glaciers and the expansion of seawater as it warms."

Climate change is a term used to describe long-term changes in global weather patterns that have:

- resulted from increased levels of certain gases in the atmosphere
- been caused by humans.

The critical gases are carbon dioxide, methane and nitrous oxide – these are known as greenhouse gases – that cause air and ocean temperatures to rise. Over time, warmer temperatures can change weather patterns and damage the environment. (MPI)  
Like other countries, New Zealand needs to prepare for rising seas. Over many millennia, the Earth's climate has cycled between ice ages and warm 'interglacial' periods. Over the last 7000 years the climate has been relatively stable, but this is now changing. Increasing concentrations of carbon dioxide and other greenhouse gases in the atmosphere are trapping heat and the climate has begun to respond.

### **One of the major and certain consequences is rising sea level.**

Most of us live within a few kilometres of the coast. Houses, roads, wastewater systems, and other infrastructure have been built in coastal areas with an understanding of the reach of the tides as they currently operate. With rising seas, tides, waves and storm surges will reach further inland than before, resulting in more frequent and extensive flooding. Along some coasts, erosion will increase and shorelines will recede. In some areas, the water table will rise. (2017- Parliamentary Commissioner for the Environment - Jan Wright)

Global temperatures are approximately 1.2°C higher than pre-industrial levels and 0.6°C higher than in the early 1990s. To prevent dangerous and potentially irreversible impacts of climate change global temperatures must be kept well below 2°C above pre-industrial levels.

Thirty years ago the term climate change was an abstract concept - but no longer. Now it's clear what scientists warned about has come true so how are we going to respond? How will we maximise our opportunities to respond to climate change, while minimizing the damage from it?

### **Sea Level Rise**

The ocean is absorbing 90 per cent of the heat added to the climate system. This warming is causing an expansion of ocean water which, in combination with water from the melting of land-based ice, is causing sea levels to rise.

The global average sea level rose about 19 cm between 1901 and 2010, at an average rate of **1.8 mm** per year. From 1993 to 2016 the global average sea level rose at an average rate of about **3.4 mm** per year. (MfE).

If we humans collectively do not lower the levels of CO<sub>2</sub>, Methane and Nitrous Oxide we are releasing into atmosphere, the rate at which the Greenland and Antarctic ice sheets and glaciers melt will increase and sea levels will rise at an ever faster rate.

### **Dealing with Climate Change**

These are deeply political questions, that confront us with big choices about what do we value and how should we organise ourselves to deal with the problems."

## Adapting to Climate Change in New Zealand

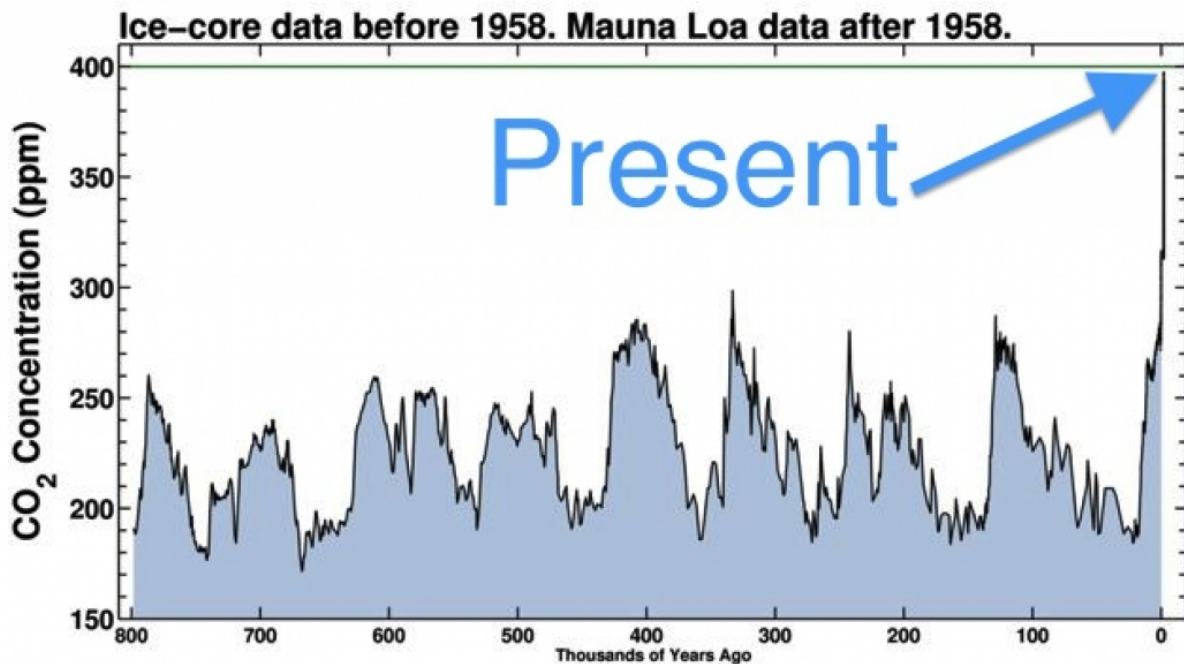
The Climate Change Adaptation Technical Working Group report Adapting to Climate Change in NZ was published in May 2018. The report reads:

**“Organised:** Unlike many other countries (developed and developing), New Zealand does not have a coordinated plan for how to adapt to climate change, the institutional arrangements for monitoring and implementing a plan, nor the tools and resources to adapt in a consistent way. Competing objectives and inconsistencies in timeframes across legislation and policies related to climate change adaptation (eg, resilience and disaster risk reduction) means roles can be confused. As a result, investment in resources to deliver adaptive action is challenging. Without investment in building capability, capacity to adapt is limited.”

<http://www.mfe.govt.nz/sites/default/files/media/Climate%20Change/ccatwg-report-web.pdf>

## MONITORING OUR PERFORMANCE

The level of CO<sub>2</sub> in the atmosphere is a good indicator of how much CO<sub>2</sub> we are generating. It has been a very long time since we had CO<sub>2</sub> levels at more than 400 parts per million.



<http://www.climatecentral.org/news/the-last-time-co2-was-this-high-humans-didnt-exist-15938>

## WHAT MORE MIGHT WE DO?

**Education** - Invite James Renwick (Professor, School of Geography, Environment and Earth Sciences Victoria University) and Dr Judy Lawrence (Senior Research Fellow, Climate Change Research Institute, Victoria University) to speak on the West Coast.

**Advisor Position** – the role of a “Climate Change Advisor” position within the West Coast. This person would have the brief to take an overview of all Council operations and to provide advice and support to ensure everything possible is done, to reduce

emissions in our region, and establish planning for the adaptations we will require, to best cope with our new future.

**Advisory Group** - Establish a regional Climate Change Advisory Group comprising representatives from science, business and community to work with Council in a collaborative way on identifying climate change threats in the West Coast and on devising appropriate responses.

***Are we projecting into the future the way we have behaved in the past?***

## **No. 31 Chris Coll Surveying**

### **Submission on Proposed West Coast District Plan**

**We are submitting in opposition to the proposed one West Coast District Plan.**

In our opinion, the problems that have been identified by having different district plans are overstated and the problems that do exist could be better solved via different mechanisms and are, in fact, already being addressed.

We feel that it is important to ask the following questions:

- How would the West Coast District Plan actually work in practice?
- Are there other more effective mechanisms to achieve the stated goals of the proposal?

#### ***How would the West Coast District Plan actually work in practice?***

In order to better assess the consequences of the proposed move and what the Buller District (and other districts) might lose as a result, we need to fully understand how the change would occur and how it would be implemented.

During the process of combining the plans, there are likely to be two recurring situations. The first would occur where rules are similar enough that merging rules or selecting one rule is straightforward. It seems fairly obvious that such cases would yield no additional “efficiencies” and are not the point of the exercise.

However, we are more concerned about situations where there are areas of contention between districts’ rules. Where rules clash, what will be the process for rule selection? How would this decision be made when there is not consensus among the West Coast District Plan Committee? If population numbers give an indication of sway, then it looks fairly disadvantageous for the Buller District.

The West Coast District Plan Brochure states the proposal will both “result in one set of district planning rules for the West Coast by bringing together the current separate Buller, Grey and Westland district plans” and “recognise the distinct character of different areas by allowing for local variations in the combined plan”. This seems like a case of attempting to “have your cake and eat it too”. If the approach being mooted is that, in instances rule difference, “local variations” will be accepted, then these cases would also yield no additional “efficiencies”.



We must not overlook the fact that oftentimes our different rules have not come about by accident. If they are not similar, then there are often very good reasons why they are not. In the case of Buller, rules have come about because they were considered the best and most practicable for this district. Where we identify rules that are not the best and most practicable for this district, having our own plan and autonomy over our own processes gives us the best chance at ensuring that they can become so.

The plan change process is a key mechanism by which the district plan can respond to better suit the needs and values of the Buller community. At the end of the day, this process is controlled by the Buller District Council – our elected representatives. Our understanding is that under the proposed West Coast District Plan, if a move for a plan change evolved in the Buller, our Councillors would no longer control this process as a plan change would affect the plan of multiple districts. A hearing committee composed of Commissioners from outside of the West Coast would sit and determine an outcome. I imagine the costs of this process would not be small but, more importantly, it is unpalatable that we would need to hand over this decision making to those outside of our community.

We believe that the implementation of a combined West Coast District Plan we would require sacrificing the ability of the plan to respond to the changing needs of our community and environment.

***Are there other more effective mechanisms to achieve the stated goals of the proposal?***

Being pushed towards a combined District Plan is particularly puzzling given that the Ministry for the Environment is already well underway with its efforts to ensure that district plans align anyway. We are not at all opposed to the proposals relating to templates and uniformity of format and structure. This is good sense and has the potential to provide significant cost savings.

Other additional opportunities for cost savings – which I understand have already been canvassed – such as shared expert witness reporting, shared consent hearings and modifying rules so they are aligned (but only where appropriate) are all possible without adopting a combined West Coast District Plan.

One benefit of a West Coast District Plan that has been particularly emphasised is the cost savings related to implementation of national policies and statements. Alignment is already occurring via plans being required to give effect to National Policy Statements, National Planning Standards, Regional Policy Statements and National Environmental Standards. Additionally, there is no reason why changes related to overarching provisions cannot be undertaken together and costs related to hearings and appeals shared and then the necessary changes can be promulgated through each plan individually as appropriate.

The Environment Guide whose research and content is supported by the New Zealand Law Foundation states that “under the Resource Management Act, decision-making has been decentralised to local and regional levels...this is based on the principle that decision-making is best carried out at the level closest to the resources affected and better enables public participation in resource management decision-making.”<sup>1</sup> We are opposed to changing the actual objectives, policies and rules that have been developed in the Buller for the Buller.

### **Conclusion**

The step of forming a one West Coast District Plan is likely to be irrevocable. Before a move from the status quo is implemented on the basis of streamlining and cost savings, the public needs to see more substantive and quantified evidence. It is only then that they can decide if saving “x” amount of dollars is worth what we stand to lose and where efficiencies will actually occur.

If we undertake even a superficial Cost Benefit Analysis we can see that potential costs of the proposed move are significant. The benefits that we can accrue are not sufficient particularly when there are better ways of achieving these with virtually no disadvantages.

Thank you for the opportunity to submit on this proposal.

Yours faithfully,

### **Jan Coll**

MNZIS, JP, REA, NZCE(Civil)  
Chris J Coll Surveying Limited  
P.O. Box 204 Westport 7866  
(03) 789 8425  
jan@cjc.co.nz

### **Laura Coll McLaughlin**

BSurv(Hons), ANZIS  
Chris J Coll Surveying Limited  
P.O. Box 204 Westport 7866  
(03) 789 8425  
laura@cjc.co.nz

<sup>1</sup> Environment Guide. (2018). Introduction

<sup>2</sup> Environment Guide. Retrieved from <http://www.environment.govt.nz/>

## No. 32: Te Runanga o Makaawhio



24 May 2018

Local Government Commission  
PO Box 5362  
WELLINGTON 6140

Emailed to: [submissions@lgc.govt.nz](mailto:submissions@lgc.govt.nz)

Tēnā koe,

### **RE: Draft proposal for combined West Coast Tai Poutini District Plan**

Thank you for your letter dated 9 April 2018 regarding the release of your draft West Coast local government reorganisation proposal.

Te Rūnanga o Makaawhio understands that the proposal would see the establishment of a Joint West Coast District Plan Committee, comprising Buller, Grey and Westland district Councils, West Coast Regional Council, Te Rūnanga o Makaawhio and Te Rūnanga o Ngāti Waewae, to be responsible for preparing and approving a new combined district plan for Tai Poutini/the West Coast. This would follow the transfer of the legal obligations of the three district councils to prepare and maintain a district plan under the Resource Management Act 1991 to West Coast Regional Council, with delegated power to prepare and approve the combined plan then given to the Joint West Coast District Plan Committee.

Te Rūnanga o Makaawhio is very supportive of the overall proposal. The proposed combined district plan approach will ensure a unified planning approach across the entire Tai Poutini. We particularly support the establishment of the Joint West Coast District Plan Committee which will ensure that decision making related to the development of the combined district plan will occur in partnership with Te Rūnanga o Makaawhio and Te Rūnanga o Ngāti Waewae.

The following responses relate to the specifics in the legal description provided in the consultation material.

#### ***Transfer of statutory obligations***

1. Te Rūnanga o Makaawhio supports the obligations of Buller, Grey and Westland district councils to prepare, maintain, and periodically amend and review a district plan being transferred to the West Coast Regional Council.
2. Te Rūnanga o Makaawhio supports the West Coast Regional Council delegating its transferred district plan obligations to a joint West Coast District Plan Committee.

**Provisions for inclusion in reorganisation scheme**

3. Te Rūnanga o Makaawhio supports the reorganisation scheme to include a mandatory joint committee and a technical advisory team. For completeness, Te Rūnanga o Makaawhio seeks that the legal description in 3(a) is amended to also refer to Te Rūnanga o Ngāti Waewae and Te Rūnanga o Makaawhio in addition to the four West Coast councils.

**West Coast District Plan Committee**

4. Te Rūnanga o Makaawhio supports the purpose of the West Coast District Plan Committee.
5. Te Rūnanga o Makaawhio supports the committee including a representative appointed by Te Rūnanga o Makaawhio and a representative appointed by Te Rūnanga o Ngāti Waewae.

**West Coast District Plan Technical Advisory Team**

6. Te Rūnanga o Makaawhio supports the appointment of a technical advisory team to provide technical advice to the West Coast District Plan Committee.
7. Te Rūnanga o Makaawhio requests that the technical advisory team includes a representative with experience in incorporating Ngāi Tahu values into a resource management plan. This person would be appointed by Ngāi Tahu.

**Affected local authorities continue in existence**

8. Te Rūnanga o Makaawhio is supportive of the four councils continuing in existence.

**Transition body**

9. Te Rūnanga o Makaawhio is supportive of a transition body being constituted to make arrangements.
10. Te Rūnanga o Makaawhio supports who the transition body will comprise of.

**Transition board**

11. Te Rūnanga o Makaawhio supports the transition board including a representative appointed by Te Rūnanga o Makaawhio and a representative appointed by Te Rūnanga o Ngāti Waewae
12. Te Rūnanga o Makaawhio supports the role of the transition board.

Te Rūnanga o Makaawhio does not wish to be heard in support of our response at the upcoming hearings, however the Local Government Commission is welcome to contact me via phone on 027 243 4629 or via email at [Tim.Rochford@ngaitahu.iwi.nz](mailto:Tim.Rochford@ngaitahu.iwi.nz) any time regarding our response.

Nāku noa, nā



Tim Rochford

Chairperson

Te Rūnanga o Makaawhio

cc Te Rūnanga o Ngāti Waewae, PO Box 37, Hokitika 7842

Te Rūnanga o Ngāi Tahu, PO Box 13-046, Christchurch 8041

## **No. 33 Federated Farmers of New Zealand**

### **Submission to the Local Government Commission on the Draft Reorganisation Proposal for the West Coast: Combined District Planning**

To: The Local Government Commission

Name of submitter: Federated Farmers of New Zealand

Contact person: David Cooper  
Senior Policy Advisor  
E: dcooper@fedfarm.org.nz  
M: 0274 755 615

Address for service: PO Box 5242  
Dunedin 9054

This is a Submission to the Local Government Commission on the Draft Reorganisation Proposal for the West Coast: Combined District Planning

*Federated Farmers Submission to the Local Government Commission on the Draft Reorganisation Proposal for the West Coast:  
Combined District Planning*

## **Summary of Feedback**

### **The Commission's proposal for a combined West Coast District Plan**

- Federated Farmers supports the Commission's proposal for a combined District Plan across the West Coast.
- Federated Farmers also welcomes the Commission's effort in working with the four West Coast councils to deliver a 'regional efficiency programme', formalised under a memorandum of understanding.
- We consider this 'behind the scenes' work will provide a locally led platform to seek further efficiencies, while limiting the potential costs (in terms of less representation or accountability) which may have eventuated under the other options considered.

### **The significance and complexity of Local Government for West Coast farmers**

- Local Government structures, roles, responsibilities and processes are of significant concern to West Coast farmers.
- These components of local government's overall impact on or importance to farmers are complex, interacting, and occasionally conflicting.
- We agree with the Commission that any changes motivated with a view to reducing the costs of local government on the West Coast should consider the potential adverse impact on representation of, and accountability for, the Coast's separate and distinct communities of interest.

### **The Local Government Commission's approach and processes**

- Federated Farmers considers the Commission's background reports and papers indicate a tradeoff between representation/accountability and the financial costs of local government on the West Coast.
- Feedback from farmers indicates differences between existing district planning provisions are in many areas justified. Consequently, while we support the Commission's proposal we consider the representatives of the separate district councils working on the combined district plan need to ensure any changes to the provisions in the local, operative plans will reflect these unique and distinct issues, challenges or needs.

## 1.1 Introduction

- 1.2 Federated Farmers of New Zealand (Inc.) is a voluntary, primary sector organisation representing farming members and their families. Federated Farmers has a long history of representing the needs and interests of New Zealand farming communities, primary producers and agricultural exporters.
- 1.3 The Federation aims to add value to its members' farming businesses by ensuring that New Zealand provides an economic and social environment within which our members may operate their business in a fair, flexible and sustainable manner.

## 2.1 The Commission's proposal for a combined West Coast District Plan

- 2.2 A summary of the Commission's proposal – The Local Government Commission ('the Commission') has proposed that the obligations of Buller, Grey and Westland district councils to prepare and maintain a district plan under the Resource Management Act 1991 (RMA) are transferred to West Coast Regional Council.
- 2.3 The proposal will also see the establishment of a joint committee, comprising West Coast Regional Council, the three district councils and local iwi, responsible for preparing and approving a new combined plan.
- 2.4 What the proposal will not do – As outlined further in this submission, West Coast farmers are impacted by local governance structures and roles in myriad ways. In respect to considering the opportunity for amalgamation of the current local government structures and processes on the West Coast, there is some tension between these impacts.
- 2.5 As a broad view Federated Farmers considers there is a need for a balance between changes to Local Government on the West Coast, while retaining the important representative components. This in turn means the nuance to the Commission's proposal is important. Our understanding is the proposal retains the following current structures:
- a. The three district councils and the West Coast Regional Council remaining in place;
  - b. The distinct character of different areas will remain recognised by allowing for local variations in the combined district plan;
  - c. The current district councils will continue to be responsible for administering the new plan once it is adopted;
  - d. All other aspects of current district council responsibilities (roading, governance etc) will remain the same.
- 2.6 For the purpose of clarity, we support these specific exclusions from the Commission's proposal, at least in the short term.

- 2.7 We consider the Commission's District Planning proposal strikes the right balance - These myriad concerns are complex, interacting, and occasionally conflicting. Focusing entirely on the concerns farmers have around the costs or complexity of local government on the West Coast and the answer would be simple; less local government, and more streamlined processes. However, this would adversely impact farmers in respect to the representative functions that local government can play, and disregard the need for specific representation of, and accountability for, the differences across the West Coast region and within existing districts.
- 2.8 Therefore, as a general view we consider the Commission's proposal strikes the right balance. Broadly this balance is between delivering on the identified community desire for change to local government on the West Coast and the potential for efficiencies over the long term on one hand, while on the other hand retaining clear representation of the separate and distinct communities of interest across the West Coast.
- 2.9 The Commission's proposal begins a process which may or may not promote further locally led change – We note that since the Commission began its review of Local Government on the West Coast, there has been a considerable effort from Grey, Buller and Westland District Councils, and West Coast Regional Council, to work together in order to work together more efficiently and find synergies across the breadth of their collective responsibilities.
- 2.10 This has included the Commission working with the four councils to deliver a 'regional efficiency programme', formalised under a memorandum of understanding. The Commission's report outlines the regional efficiency programme is indicative of a new commitment 'by the four councils to work together collaboratively to achieve regional efficiencies in the delivery of council services'.
- 2.11 Consequently, we consider the Commission's work in finding efficiencies is not simply limited to the proposal for a combined District Plan. We consider the Commission's role in working with West Coast councils has initiated an iterative relationship through which greater efficiencies may eventuate, under a locally led and considered process. This work has already begun, and the benefits will result whether or not the Commission's proposal proceeds.
- 2.12 As addressed further in this submission, while farmers are among the first to seek greater efficiency in local government, it is also important that these efficiencies do not come at too great a cost in terms of reduced representation of, and accountability for, the Coast's separate and distinct 'communities of interest'.
- 2.13 Consequently, we consider the proposal for a combined District Plan, combined with the less visible work the Commission has put into assisting the four West Coast councils to develop a 'regional efficiency programme' represents the best approach to delivering on the identified desire for change identified through the review process.



## Summary

**Federated Farmers supports the Commission's proposal for a combined District Plan across the West Coast.**

**Federated Farmers also welcomes the Commission's effort in working with the four West Coast councils to deliver a 'regional efficiency programme', formalised under a memorandum of understanding.**

**Federated Farmers Submission to the Local Government Commission on the Draft Reorganisation Proposal for the West Coast: Combined District Planning**

**We consider this 'behind the scenes' work will provide a locally led platform to seek further efficiencies, while limiting the potential costs (in terms of less representation or accountability) which may have eventuated under the other options considered.**

### **3.1 The significance and complexity of Local Government for West Coast farmers**

3.2 The Commission is already aware of the importance of Local Government representation, structures and processes to farmers on the West Coast. However, in order to provide context to our support for the Commission's proposal, it is useful to briefly explain the significance of the current Territorial Local Authority (TLA) structures and processes to farmers on the Coast.

3.3 Local Government's resource management functions are vital to farmers and rural communities - Farmers are significant users of natural resources through the Resource Management Act (RMA), including in areas managed through the district planning process. Section 31 of the RMA outlines the functions of territorial authorities to be addressed in the district plan, including the:

- a. Effects of land use
- b. Impacts of land use on natural hazards and the management of hazardous substances
- c. Noise
- d. Activities on the surfaces of rivers and lakes
- e. Impacts of land use on indigenous biological diversity

3.4 The district planning development process and implementation of the district plan, including consenting and regulation are therefore of material interest to farmers, as is the ability to have some say in the way these areas are managed to reflect local pressures, concerns and preferences.

3.5 Even though the region's district plans are required to 'give effect to' higher level planning documents, including National Policy direction and the West Coast Regional Policy Statement which is currently under development, it is important there remains some capacity for local input into, and accountability for, provisions developed through the district plans of West Coast councils.

- 3.6 Roading and infrastructure – West Coast TLAs are key providers of the local roading network, a service which both farmers and rural residents in general are heavily reliant upon. This reliance is pronounced in a geographically spread and diverse area like the West Coast.
- 3.7 Farmers are also relatively impacted by other infrastructure decisions made by Council's including the siting and funding of local amenities like public toilets and waste disposal facilities. Failure to provide sufficient facilities can lead to public waste on-farm, or significant costs.
- 3.8 Rating and funding decisions are material for farmers – A heavy reliance on property valuebased rating systems for funding West Coast councils means that farmers are significant contributors to local authority revenue.
- 3.9 This is particularly relevant on the Coast, which (as acknowledged in the LGC consultation document) has a relatively small population base being asked to meet the costs of a large geographical area, with a large proportion of the region being unrateable Department of Conservation land.
- 3.10 Decisions around the allocations of rates can materially impact farming viability, and it is important that decisions made around rating and funding are made with appropriate consideration of the impact on farmers specifically.
- 3.11 Councils and Councillors remain important representatives of the community - Councillors are often important representatives for rural ratepayers. Sufficient local government representation provides an important avenue for identifying and addressing specific challenges for rural ratepayers, and this representation also provides input of these perspectives and particular rural frustrations in each council's interaction with other organisations, particularly central government and ministries.
- 3.12 Representation is population, not impact based - Representation as defined by the Local Electoral Act is reliant to a significant extent on population. This is often not ideal for rural areas, and often under-represents the impact that council decisions can have on primary production and rural communities.
- 3.13 This is a material consideration in respect to the Commission's review of the current representative arrangements on the West Coast, as any amalgamation of representation structures and processes would, while saving money, also have to consider the impacts on representation of separate and distinct communities of interest across the West Coast.
- 3.14 Farming viability can be significantly impacted by Council's decisions in these areas, and elected Councillors and staff with a focus on a defined geographical area and specific communities of interest play an important role in informing TLA functions in respect to these areas. Given the West Coast's rural communities are largely based around farming or the provision of farm support services, the social and economic impacts of decision making extend beyond the farmer's boundaries.

3.15 Our purpose in outlining these considerations is to reinforce that we agree with the Commission that any changes to Local Governance on the Coast motivated with a view to streamlining decision making or finding efficiencies in local government should consider the potential adverse impact of these changes on representation of the concerns of individuals and communities, including farmers.

## **Summary**

**Local Government structures, roles, responsibilities and processes are of significant concern to West Coast farmers.**

**These components of local government's overall impact on or importance to farmers are complex, interacting, and occasionally conflicting.**

**We agree with the Commission that any changes motivated with a view to reducing the costs of local government on the West Coast should consider the potential adverse impact on representation of, and accountability for, the Coast's separate and distinct communities of interest.**

### **3.1 The Local Government Commission's approach and process**

3.2 In formulating an opinion on the Commission's proposal, Federated Farmers is influenced by the robust and considered process the Commission has followed. We have also drawn from the background reports and papers informing the Commission's proposal. We will briefly respond to some of this work below.

3.3 MartinJenkins financial and operational analysis report – As already addressed in this submission, Federated Farmers is keenly interested in the efficiency and costs of local government. These concerns are particularly relevant to West Coast farmers and other ratepayers given the large geographical area, relatively low population and significant expanses of the region's land which are unrateable by councils.

3.4 The MartinJenkins report quantified some of the potential efficiency gains in a very clear manner. In particular, the estimates summarised at Table 6 of the report underlined how much less local government would save local communities in a monetary sense.

3.5 Under the report's analysis, the most efficient option was for one District Council, providing a NPV of nearly \$3.5 million savings over the initial seven years, followed by a Unitary Authority for the West Coast, providing a NPV of nearly \$2 million savings over the initial seven years.

3.6 These are significant financial savings given the population of the West Coast. Comparatively, Council's preferred option, a combined District Plan, delivers relatively low cost savings. However, we recognise that these cost savings would result in unquantified costs in terms of reduced representation and accountability, and as addressed at section 3 of this submission we consider these are significant concerns for farmers.

- 3.7 We also consider the Commission's effort in working with the four West Coast councils to deliver a 'regional efficiency programme', will provide a platform which can potentially deliver these additional savings, particularly if this work delivers a process which embeds the search for greater efficiencies within each council over the long term.
- 3.8 Public Opinion survey – Federated Farmers supports the Commission's robust assessment and surveying of community desire for change to Local Government on the Coast. As a general view, while the majority (51%) said there needs to be a change in the way local government on the West Coast is organised (with 10% unsure and 40% indicating there does not need to be change), it was notable that support for specific new or rearranged structures proposed by the Commission to survey respondents was significantly lower, and opposition higher.
- 3.9 We note that respondents indicated transferring responsibility for some services between councils had the lowest opposition (35%) and one of the highest levels of support (37%). It is this form of reorganisation the Commission has ultimately landed on in its proposal.
- 3.10 Communities of Interest report – Balanced against the potential cost savings outlined in the MartinJenkins report, and the desire for change, is the impact that 'less local government' will have on representation and accountability across the communities comprising the West Coast. These potential impacts depend on whether the potential change options would reduce specific representation of the Coast's identified 'communities of interest'.
- 3.11 The Commission's report on communities of interest concluded that: *"Current communities of interest existing at the regional, district and local levels on the West Coast are generally as identified by the Commission in 1988 and on which current local government arrangements continue to be based"*.
- 3.12 The report also concluded that: *"To the extent that any change option involves combining two or more districts, it can be seen to comprise a grouping or groupings of current communities of interest or, in terms of clause 11(5)(c), contain one or more distinct communities of interest"*.
- 3.13 Federated Farmers has been guided by this assessment as indicative of the potential losses to representativeness and accountability, in balance to the significant cost savings estimated to result from the two options which offered the greatest potential for efficiency (one District Council, or a Unitary Authority).
- 3.14 We have also been heavily guided by the feedback from farmers across the three districts that there remains an important justification for keeping some responsibilities separate, at least over the short term. This includes ensuring there is some scope to provide for local variations in the combined district plan.

- 3.15 Feedback from these farmers indicates that in the preparation of the proposed combined district plan, it is of vital importance that representatives of the separate district councils consider the separate and distinct impacts that any changes to the provisions in the plan will have on the unique and distinct communities within their districts.
- 3.16 It is also important that any combined district plan ensure that where there is a genuine need for provisions, approaches, consenting frameworks or implementation of these provisions to reflect the different impacts they will have on specific resource users, there is scope for these differences to be recognised.
- 3.17 This is an area outside of the Commission's areas of responsibility. However, they are material concerns for farmers, who are currently working under different provisions and consenting frameworks, under the three existing district plans.
- 3.18 While some components of these will change irrespective of the Commission's proposal (due to changes to the Regional Policy Statement and changes to the issues being addressed through district plan review processes) it is important that the district council representatives working on the combined district plan consider there will often be a genuine necessity to ensure different provisions apply to different areas of the West Coast.
- 3.19 Therefore, while we support the Commission's proposal, we underline the importance of the Commission's report into communities of interest. Different communities of interest have different needs and drivers, and will face different social, cultural, environmental and economic impacts as a result of the combined district planning process. It is inherent on those District Council representatives working on the proposed combined district plan to accurately reflect these differences where required or justified.

## **Summary**

**Federated Farmers considers the Commission's background reports and papers indicate a trade-off between representation/accountability and the financial costs of local government on the West Coast.**

**Feedback from farmers indicates differences between existing district planning provisions are in many areas justified. Consequently, while we support the Commission's proposal we consider the representatives of the separate district councils working on the combined district plan need to ensure any changes to the provisions in the local, operative plans will reflect these unique and distinct issues, challenges or needs.**

**No. 34: Mapourika Holdings Ltd**

**SUBMISSION ON THE DRAFT PROPOSAL FOR A COMBINED WEST COAST DISTRICT PLAN**

To *Local Government Commission*

Name of submitters: *Mapourika Holdings Limited*

This is a submission on the following:

*Draft proposal for a combined West Coast District Plan*

The submitter **does not** wish to be heard in support of this submission.

.....

Signature of person  
authorised to sign on  
behalf of Mapourika Holdings Limited

Date 23 May 2018  
Address for Service of Submitter: 20 Addington Road, RD 1, ŌTAKI 5581  
Telephone: 021 877 894  
E-mail: tom@landmatters.nz  
Contact Person: Tom Bland

**IN THE MATTER**

of the Local Government Act 2002

**AND**

**IN THE MATTER**

of the Draft proposal for a combined West Coast District Plan

## **SUBMISSIONS OF MAPOURIKA HOLDINGS LIMITED**

### **INTRODUCTION**

1. Mapourika Holdings Limited (**MHL or the submitter**) has owned land south of Lake Mapourika, to the west of State Highway 6, in the Westland District since 2003. The submitter's land is currently within the Rural Zone of the Westland District Plan.
2. In 2004, MHL obtained subdivision consent from Westland District Council (**WDC**) to subdivide the land in to seven rural-residential allotments with the balance land, either side of Potter's Creek, retained as balance land. MHL still owns the balance land (approximately 49 hectares in land area). The land is currently leased for dairy grazing.
3. The Westland District Plan was made operative in June 2002 and has been the operative district plan for the district for 16 years<sup>1</sup>. An issues and options paper was produced by WDC's Planning and Regulatory Committee in December 2009.

### **SUBMISSIONS**

4. The submitter **supports** the draft proposal for a combined West Coast District Plan as set out in the Local Government Commission's April 2018 proposal document.
5. The submitter recognises that the West Coast region is subject to a range of significant and unique resource management planning issues that will require detailed consideration and responses for the region to prosper economically, whilst retaining its unique natural and social character.

<sup>1</sup> Section 79 of the Resource Management Act requires a local authority to review its district plan every 10 years.

6. The submitter also recognises that the three district councils (Buller, Grey and Westland) and the West Coast Regional Council have a very low rating base with a combined population of 32,000 and 85% of the land area administered by the Crown (and therefore not subject to rates).
7. It is the submitter's view that it is inefficient and uneconomic for the three existing District Councils to attempt to address the region's unique and significant resource management issues individually. A consequence of this is that district planning documents become outdated and are still in use beyond an acceptable time period.
8. Despite the individual character of each district, which the submitter recognises will need to be taken into consideration in any future district plan documents, there are significant benefits in efficiency and the sharing of expertise from the four councils working together to prepare a combined district plan. The submitter also considers there are a number of features and issues that are consistent across the region as a whole.
9. The submitter considers that the preparation of a combined district plan represents best practice in situations where local authorities are under pressure for resources, have shared goals for consistent resource management outcomes for the region and can retain and share resource management expertise within the region.
10. The Wairarapa Combined District Plan, which was publicly notified in 2006, is a good example of how small local authorities with shared resource management goals and common planning issues have been able to work together to provide a district plan that recognises and retains the individual character of the different districts whilst providing a document that is capable of addressing the resource management issues of the region as a whole.
11. The submitter considers such an approach would be appropriate for the West Coast region.

#### **DECISION SOUGHT**

12. The submitter supports the proposal prepared by the Local Government Commission to transfer district plan making responsibilities from Buller, Grey and Westland District Councils to the West Coast Regional Council. The submitter seeks that the proposal made by the Local Government Commission be adopted in full.
13. The submitter would like to see quick progress in the adoption of the proposal to ensure planning policy documents for the region can be brought up to date as soon as possible.
14. MHL thanks the Local Government Commission for the opportunity to make a submission on this matter.



## No. 35: Te Rūnanga o Ngāi Tahu



25 May 2018

Local Government Commission  
PO Box 5362  
WELLINGTON 6140

Emailed to: [submissions@lgc.govt.nz](mailto:submissions@lgc.govt.nz)

Tēnā koe,

**RE: Draft proposal for combined West Coast Tai Poutini District Plan**

Thank you for your letter dated 9 April 2018 regarding the release of your draft West Coast local government reorganisation proposal.

Te Rūnanga o Ngāi Tahu understands that the proposal would see the establishment of a Joint West Coast District Plan Committee, comprising Buller, Grey and Westland district Councils, West Coast Regional Council, Te Rūnanga o Makaawhio and Te Rūnanga o Ngāti Waewae, to be responsible for preparing and approving a new combined district plan for Tai Poutini/the West Coast. This would follow the transfer of the legal obligations of the three district councils to prepare and maintain a district plan under the Resource Management Act 1991 to West Coast Regional Council, with delegated power to prepare and approve the combined plan then given to the Joint West Coast District Plan Committee.

Te Rūnanga o Ngāi Tahu is very supportive of the overall proposal. The proposed combined district plan approach will ensure a unified planning approach across the entire Tai Poutini. We particularly support the establishment of the Joint West Coast District Plan Committee which will ensure that decision making related to the development of the combined district plan will occur in partnership with Te Rūnanga o Makaawhio and Te Rūnanga o Ngāti Waewae.

Te Rūnanga o Ngāi Tahu also supports the details in the responses provided by Te Rūnanga o Ngāti Waewae and Te Rūnanga o Makaawhio in their letters dated 25 May 2018 on the specifics regarding the legal description provided in the consultation material provided.

Te Rūnanga o Ngāi Tahu does not wish to be heard in support of our response at the upcoming hearings, however the Local Government Commission is welcome to contact Philippa Lynch via phone on 0212422715 or via email at [philippa.lynch@ngaitahu.iwi.nz](mailto:philippa.lynch@ngaitahu.iwi.nz) any time regarding our response.

Nāku noa, nā

A handwritten signature in blue ink, appearing to read "Kara Edwards".

Kara Edwards  
General Manager Te Ao Tūroa  
Te Rūnanga o Ngāi Tahu

cc Te Rūnanga o Ngāti Waewae, PO Box 37, Hokitika 7842  
Te Rūnanga o Makaawhio, PO Box 181, Hokitika 7842

Te Rūnanga o Ngāi Tahu  
15 Show Place, Christchurch  
PO Box 13-046, Christchurch, New Zealand  
Phone + 64 3 366 4344, 0800 KAI TAHU  
Email: [info@ngaitahu.iwi.nz](mailto:info@ngaitahu.iwi.nz)  
Website: [www.ngaitahu.iwi.nz](http://www.ngaitahu.iwi.nz)

## No. 36: Sue and Geoff Schurr

To Whom it May Concern

My wife & I wish to oppose any change for a Combined Regional Plan for the entire West Coast Region.

1. 1. We would submit that the regions are adequately covered by Their own “sub-regional plans” as the needs and distances from North to South differ dramatically.
2. 2. We would further submit that the Combined Proposal will increase the costs and decrease the services as more time and resources will be wasted in servicing the outlying regions. Much more evidence of proposed costs and services and continuity of these services is required before one could even consider any possible change.
3. 3. We would submit that with distance, topography and resources, each sub-region requires differing needs and solutions- there is no one plan that could possibly be considered as appropriate for the entire region and having sub-regional plans within the all-encompassing plan defeats the purpose and would make each plan more cumbersome.
4. 4. It is our view that Centralisation may very well suit the Government but this will only be at the expense of those in the outer regions. There is no proof indeed there is much counter evidence that centralisation will further lead to the demise and increased isolation of the outer regions.
5. 5. While the costs of servicing the combined plan will increase, sorry we can not understand how compliance costs will be less when increased transport, accommodation and paid time is required to undertake compliance matters. Furthermore it should be noted that the cost for ratepayers in the outer regions will also increase out of all proportion to any considered increase in service. The service industry in all but the centralised town will be further impacted by a reduction in demand for services.
6. 6. We would submit that the case study based around a regional boundary is not relevant as while there may be less Regional Boundaries there will still be boundaries and the same differences in services will occur for individuals on these boundaries while of course the distances to the proposed centralised body will now be huge!

In Conclusion we would suggest that while a Combined Central Plan to cover the entire West Coast may be beneficial to Central Government it will be extremely detrimental to the individual ratepayers, prospective developers and existing business in all but the Centralised Region. We would further suggest that if the “Commission” is really interested in helping the Regional Local Governments on the West Coast it should communicate the need for Central Government to pay rates on the Crown Land in each region. This would then provide our local West Coast Councils with a more secure income to provide the necessary services for the Regions that they represent.

I am prepared to speak to this submission

Sue & Geoff Schurr



Underworld Adventures Ltd (Norwest Adventures)  
Underworld Adventure Centre and Café

7368 State Highway 6  
Charleston

Box 7  
Charleston 7865  
New Zealand

Phone [\(+64\) 03 788 8168](tel:+64037888168)

Email: [contact@caverafting.com](mailto:contact@caverafting.com)

Reservations: <http://www.caverafting.com/bookings/>

Web: [www.caverafting.com](http://www.caverafting.com)

facebook: [www.facebook.com/UnderworldAdventuresNZ](https://www.facebook.com/UnderworldAdventuresNZ)

twitter: [www.twitter.com/UnderworldAdven](https://www.twitter.com/UnderworldAdven)



## No. 37: Minerals West Coast

Minerals West Coast supports the proposal to develop a combined West Coast District plan.

We are particularly in support the proposal because:

- By pooling resources, would assist the councils to meet a challenging statutory obligation i.e. resource management planning
- The proposal would enable a good quality district plan to be produced through effective use of specialised staff and outside resources
- The proposal would result in a reduction in the number of RMA planning documents in force on the West Coast. This would have the effect of:
- Providing consistent policies, definitions and rules, and assist public understanding of these
- Saving time and money for those making submissions relating to more than one district (including for West Coast Regional Council and rūnanga, which will no longer have to participate and make submissions on multiple processes)
- Reducing the number of appeals and associated legal costs for both appellants and councils
- More consistent resource consent requirements for those seeking approvals in more than one district resulting in less time and money being spent by those applicants
- Development of a single district plan for a wider more diverse area is likely to help attract and retain more skilled and experienced staff
- A combined plan would allow councils to more efficiently meet requirements to recognise and provide for matters of national importance and give effect to national directions and standards
- The proposal would make it easier to ensure district plan policies and rules are consistent with and complement regional policies and rules
- The joint committee would provide a platform for the councils to consider further possible collaboration and shared services
- The proposal leaves the existing councils in place with their existing functions and responsibilities, thereby avoiding public confusion
- The proposal would mean limited disruption to council operations and staff
- The proposal would provide for better iwi participation in planning

Peter O'Sullivan  
Manager  
Minerals West Coast  
PO Box 77  
Greymouth  
0274 318 581  
[petero@mwco.org.nz](mailto:petero@mwco.org.nz)  
[www.mwco.org.nz](http://www.mwco.org.nz)





23.5.18

Submission on Draft Proposal for Combined West Coast District Plan.

The draft proposal as presented gives no hard facts as to the annual increased costs ratepayers will be faced with, does not appear to take into account that the West Coast is almost the distance of Wellington to Auckland, some areas has very little in common, states it could be cheaper for companies requiring consents in different areas of the Coast. Let's get real and say that Timaru and Christchurch should have a combined District plan, they both have areas of common interest like Ports, Transport, farming etc. etc. yet the commission appears not to be interested. This could be carried to the extreme by having one plan for the whole of New Zealand by saying it could be cheaper and more efficient for all concerned if consents are require in different parts of the country.

As I see it local councils on the Coast are working together quite well without having a Combined District Plan foisted on them by a Commission and it being the start of the "soft sell" to amalgamation of the four Coast councils.

The Coast councils have always produced their own satisfactory District Plans as required by the RMA, without any Audit complaints at what has always been a reasonable cost to the ratepayer.

As the old saying goes..

**IF IT AINT BROKE WHY FIX IT ?**

One thing the Commission should fix is the fact that two people with a petition signed by 500, from a population of thirty two thousand people, can cause the taxpayers /ratepayers to pay out hundreds of thousands of dollars that would be better spent on necessary things.

If a petition had to be signed by at least 51% of the affected ratepayers then there would be a valid reason for an investigation.

Yours faithfully,

A handwritten signature in cursive script, appearing to read "G. Howard".

Graham Howard.