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Discussion document on potential amendments to the NPS-HPL
Ministry for the Environment
P O Box 10362
Wellington 6143

highlyproductiveland@mfe.govt.nz

Dear Sir/Madam

Managing the use and development of highly productive land

Thank you for the opportunity to submit on the Discussion Document for potential amendments to the National Policy Statement for Highly Productive Land. The West Coast Regional Council's (WCRC or the Council) submission is attached.

The Council consulted with their iwi partners, Te Rūnanga o Ngāti Waewae and Te Rūnanga o Makaawhio (Poutini Ngāi Tahu or PNT), who are mana whenua on the West Coast/Tai Poutini, in the development of this submission.

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We would be grateful for acknowledgement of receipt of our submission.

The Council consents to their submission being released to the public under the Official Information Act 1982.

Yours faithfully

Fiona Thomson
Planning and Science Manager

About the Submitter

The West Coast Regional Council (WCRC) is the local authority for a region covering a vast area with a sparse population. The distance from Kahurangi Point in the north to Awarua Point in the south is the approximate distance from Auckland to Wellington.



The West Coast region stretches the equivalent distance of that between Auckland and Wellington

Figure 1: Map of New Zealand to highlight the 600km length of the West Coast Region compared to the distance between Auckland and Wellington.

As indicated in Figure 1, the West Coast coastline is approximately 600km in length. There is relatively little development in the Region's Coastal Marine Area, over which the Council has certain delegated responsibilities under the Resource Management Act.

The West Coast Regional Council works closely with the regions' three territorial authorities (the Buller, Grey, and Westland District Councils). The main towns are Westport, Greymouth, Reefton, and Hokitika. The region's relatively low population of approximately 32,600 is spread across small towns, settlements, and rural communities.

Te Rūnanga o Ngāti Waewae and Te Rūnanga o Makaawhio (of Poutini Ngāi Tahu – PNT) are mana whenua of Te Tai o Poutini (the West Coast). The 'Paetae Kotahitanga ki Te Tai Poutini Partnership Protocol, Whakahono ā Rohe Resource Management Act Iwi Participation Agreement; A Protocol and Arrangement between Te Rūnanga o Ngāti Waewae, Te Rūnanga o Makaawhio, Te Rūnanga o Ngāi Tahu and the West Coast Regional Council of October 2020' captures the intent of WCRC and its partners to progress our relationship in accordance with the Treaty of Waitangi partnership between iwi and the Crown.

The West Coast is predominantly rural.

The Conservation Estate comprises 84.17% of the West Coast land area, with an additional 1.55% administered by Land Information New Zealand (LINZ). This leaves 14.28% of land available for private ownership. The land in the Conservation estate and Crown ownership is not rateable by local authorities.

Infometrics data on 'Contribution to employment by broad sector, 2022' shows the West Coast region having a predominantly 'services' orientated economy:

- 'Other services' accounted for 40%;

- 'High value services' 23.2%;
- 'Goods-producing industries' 22.1%; and
- 'Primary industries' made a 14.8% contribution.

Whereas, Infometrics more detailed 'Filled jobs by 54 industry categories list' shows the percentage contribution to the West Coast's regional economy, as at 2022, as:

- Health Care and Social Assistance - 11.1%;
- Accommodation and Food Services - 9%;
- Dairy Cattle Farming - 6.1% (and dairy product manufacturing 3%);
- Education and Training - 6.1%; and
- Construction Services - 4.4%.¹

¹ Structure of West Coast Region's Economy; Source Infometrics at <https://ecoprofile.infometrics.co.nz/West%20Coast%20Region/Employment/Structure>, last viewed 29 May 2023.

West Coast Regional Council Submission on Government's potential amendments to the National Policy Statement for Highly Productive Land

The Council welcomes the opportunity to contribute to the Government's potential amendments to the National Policy Statement for Highly Productive Land (NPS-HPL).

Issue 1: no clear pathway for new specified infrastructure is provided

The West Coast Regional Council (WCRC) agrees that the omission of a clear consent pathway for the construction of new specified infrastructure in clause 3.9(2)(j)(i) could limit the ability to provide for necessary new specified infrastructure on HPL. Therefore, Council supports providing in the NPS-HPL for construction of new specified infrastructure on HPL, where there are no suitable alternative non-HPL sites.

According to the Landcare Research mapping of Land Use Capability (LUC) soils in New Zealand, the West Coast region does not have any Class 1 and 2 soils. The main areas of Class 3 soils (arable with moderate limitations soils) are spread between the north of Karamea and Westport, as well as Maruia and along the Grey River.

Council supports the definition of "specified infrastructure" in the NPS which covers "infrastructure that is recognised as regionally or nationally significant in a National Policy Statement, New Zealand Coastal Policy Statement, regional policy statement or regional plan". The West Coast Regional Policy Statement (RPS) recognises the Regional Council seawalls, stop banks and erosion protection works as regionally significant infrastructure, so the amendment would enable flood protection works to be undertaken where needed on Class 3 soils in the West Coast.

The current lack of a consent path for the construction of specified infrastructure can be a significant issue for the West Coast as flood or coastal protection works may need to be located on some areas of HPL in the future. The main example is the area of LUC Class 3 soils south of Westport and adjoining the Orowaiti River, which has been a major safety concern for the communities since the 2021 and 2022 floods. These LUC Class 3 soils may be identified as highly productive areas, but they are situated in major overland flow paths. Council wishes to ensure that regionally significant flood protection structures in these areas are enabled by national direction in the future, given the Council's responsibility to protect communities and provide flood protection via rating districts.

Furthermore, most of the Class 3 soils on the West Coast are situated in flood plains as they are adjacent to a main river (*Eg* the Grey River in the Grey Valley). Climate change and the conclusive evidence of the increase of intense weather events may require more protection infrastructure to provide short to medium term safety to West Coast communities, until other climate adaptation options are available.

Council notes that the discussion document on potential amendments to the NPS-HPL seems to focus on solar farms in the Hawkes Bay Region. If some amendments shall be made to clause 3.9(2)(j)(i) of the NPS-HPL, they should apply to all specified infrastructure in all regions, and not just create a new consent path for one specific type of infrastructure.

Recommendation:

The Council supports the Government's proposition on providing a clear consent pathway for construction of new specified infrastructure in the NPS-HPL, where there are no suitable alternative non-HPL sites.

This ends our submission.