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Te Tai o Poutini Plan Submissions
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Te Tai o Poutini Plan Submission

1. Submitter

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2. Executive Summary

Development West Coast (DWC) is supportive of the development a combined plan for the region to achieve the purpose of the Resource Management Act at the District level. We support collaboration between the Council's in regard to these matters.

The objectives of Te Tai o Poutini Plan, in enabling activities to meet the current and future needs of communities, including; for quality infrastructure and public services, and ensuring performance of regulatory functions in a way that is most efficient, appropriate and cost-effective for households and businesses; underpins DWC's strategic objectives. As an organisation we aim to promote employment opportunities and generate sustainable economic benefits for the region by investing in business and regional development projects. It is vitally important that the regulatory policies that determine how we use and manage potential adverse effects on our natural and physical resources are effective, consistent and efficient enabling documents that assist economic development in a manner appropriate to the West Coast.

This submission focuses on giving strength to the strategic directions of Te Tai o Poutini Plan TTPP, the Regional Policy Statement (RPS), published by the West Coast Regional Council in 2020 and Te Whanaketanga 2050, the regional economic development strategy facilitated in 2022 by Development West Coast and owned by the Te Whanaketanga Steering Group.

The local and regional government regulatory framework seeks to promote the strength and resilience of local communities by enabling them to provide for their current and future wellbeing, through an effective system of local governance.

DWC's has a mandate to facilitate regional economic development while also caring for our people and our place. Our strategic priorities include identifying opportunities to diversify our businesses and sectors while being pro-active and responsive to the economic climate and external factors affecting our region.

We acknowledge that the process of creating a combined district plan is an important step in the right direction. We seek to make sure that TTPP is an effective enabler of economic development as the region looks to future opportunities and challenges.

3. Background

3.1. Development West Coast (DWC)

DWC was set up as a Charitable Trust in 2001 to manage, invest and distribute income from a fund of \$92 million received from the Government.

This fund was an adjustment package for the loss of indigenous forestry and the privatisation of much infrastructure on the West Coast in the late 1990s.

DWC is governed by a Deed of Trust which specifies DWC's Objectives - to promote sustainable employment opportunities; and generate sustainable economic benefits for the West Coast, both now and into the future.

Following the Tai Poutini Regional Growth Study released in 2016, DWC has been mandated to carry out the functions of regional economic development for the West Coast region and, in doing so, is concerned with matters of economic impact for the region.

DWC is also the Regional Tourism Organisation (RTO) undertaking tourism destination management and marketing for the region.

DWC acknowledges the government is currently placing a high priority on supporting regional economic development, and the region is benefitting from government investment over several projects.

3.2. Te Whanaketanga 2050

An updated economic development strategy has been consulted on as the region faces the challenge of finding its place in the national economy going forward while at the same time safeguarding the social, community and economic welfare of its residents.

Te Whanaketanga Te Tai Poutini 2050 Strategy¹ has, as its collective commitment, "unlocking the potential of Te Tai Poutini (the West Coast) by carving our own path, front footing the change required and working in partnership with open minds and a solution-based approach to the wero (challenges) we face." The Strategy is endorsed by the collective Mayors, Chairs and Iwi Group and led by a regional steering group.²

The strategy has recently resulted in the development of a Renewable Energy Strategy focused on future opportunities and the infrastructure required to support new projects.

Te Whanaketanga's mission is to create a sustainable, inclusive and prosperous future for Te Tai Poutini that our people can be proud of and our Rangatira can look forward to. The vision is to be recognised as leaders in the adoption of innovative, sustainable and regenerative economic, social, wellbeing and environmental solutions.

¹ <https://tewhanaketanga.nz>

² <https://tewhanaketanga.nz/steering-group/>

4. Submissions

Development West Coast considers that it can best assist this process by reviewing and submitting on high level and strategic matters related to the proposed plan. We acknowledge that there will be a wide range of views and opinions at the more detailed level of the plan, ie specific provisions related to zones, natural and heritage values, district wide matters and it may be that we take the opportunity to make further submissions in relation to specific submission points.

For the purpose of this submission we have focused on some general matters relating to development of the plan and specific points related to “Strategic Direction”. We are aware that the West Coast Regional Policy Statement (the RPS) was developed through a very rigorous process and that the Te Tai o Poutini Plan must give effect to the RPS.

Provision:	General
Position:	DWC supports in part.
Reason:	<p>In considering the development of the plan DWC is aware that the RPS contains a specific Policy (Policy 2, Chapter 4) directing how regional and district plans are to be developed.</p> <p>As noted in the RPS 2020³ regional and district plans must:</p> <ul style="list-style-type: none">a) Contain regulation that is the most effective and efficient way of achieving resource management objective(s), taking into account the costs, benefits and risks;b) Be as consistent as possible;c) Be as simple as possible;d) Use or support good management practices;e) Minimise compliance costs where possible;f) Enable subdivision, use and development that gives effect to relevant national and regional policy direction; andg) Focus on effects and, where suitable, use performance standards. <p>While it is accepted that the combination of 3 District's into one plan document and compliance with national planning standards presents some challenges we are also aware that the plan is a complex document. We seek that any decision made in relation to the plan recognise and give effect to the matters in the RPS to ensure the plan meets the outcomes sought by the West Coast Community with regard to plan development.</p>
Decision Sought:	DWC seeks that in developing, determining matters arising, and finalising the plan and provisions the TTPP gives effect to Policy 2 of Chapter 5 of the RPS for the West Coast.

³ <https://www.wcrc.govt.nz/publications/regional-plans/regional-policy-statement>

Provision:	General
Position:	DWC supports in part
Reason:	<p>DWC seeks to ensure that any provisions within TTPP are suitable and appropriate to the West Coast region. In this regard Section 32 of the Resource Management Act (RMA) is an important component of developing plan provisions. We note that in summarising reasons for deciding on provisions Clause 2(a) of the RMA requires that assessments must:</p> <ul style="list-style-type: none">a) identify and assess the benefits and costs of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the provisions, including the opportunities for:<ul style="list-style-type: none">i) economic growth that are anticipated to be provided or reduced; andii) employment that are anticipated to be provided or reduced;b) if practicable, quantify the benefits and costs referred to in paragraph (a); andc) assess the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the provisions. <p>DWC seeks that assessments in Clause 2(a) are rigorous in regard to those matters.</p>
Decision Sought:	<p>Whilst it is accepted that potential adverse effects on the environment must be appropriately managed DWC seeks that in developing, determining matters arising, and finalising the plan and provisions that the TTPP does not reduce economic growth and/or employment when assessments are made pursuant to Section 32 of the RMA.</p>

Provision:	Strategic Directions Overview
Position:	DWC supports in part
Reason:	<p>DWC supports the inclusion of Strategic Directions that have effect across the plan, including through both plan development processes and resource consent processes. The overview advises that the Strategic Directions are intended to demonstrate 7 areas of importance across the Districts. DWC notes the existing strategic objectives and policies include important components of social, economic, cultural and environmental wellbeing of the West Coast. DWC considers that, having taken into account the provisions of the RPS, an additional focus should be enabling thriving communities through a resilient, sustainable and diverse economy and the use and development of resources. It is considered that this additional focus will complement the existing strategic objectives and policies while providing a broader emphasis to the strategic directives that should be clearly articulated.</p>

Decision Sought: DWC submits that an additional item (Number 8) be added to the third paragraph so that the Strategic Directions, “are intended to demonstrate:

8. enabling thriving communities through a resilient, sustainable and diverse economy and the use and development of resources.”

Provision: Strategic Objectives

Position: DWC supports in part.

Reason: Based on the submission above to the Strategic Directions overview section, DWC submits that an additional suite of Strategic Objectives and Policies are required. These will give effect to, and complement the existing RPS and TW. These will guide and direct plan development in implementation processes to achieve outcomes sought at the regional level.

Of particular relevance are objectives and policies in Chapters 4 and 5 of the RPS. The particular ones we refer to are:

Chapter 4 Resilient and Sustainable Communities.

Objectives:

1. To enable sustainable and resilient communities on the West Coast.
2. This region’s planning framework enables existing and new economic use, development and employment opportunities while ensuring sustainable environmental outcomes are achieved.

Policies:

1. To sustainably manage the West Coast’s natural and physical resources in a way that enables a range of existing and new economic activities to occur, including activities likely to provide substantial employment that benefits the long terms sustainability of the region’s communities.

Chapter 5 – Use and Development of Resources

Objective:

1. To recognise and provide for the role of resource use and development on the West Coast and its contribution to enabling people and communities to provide for their social, economic and cultural wellbeing.

Policy:

1. Enabling sustainable resource use and development on the West coast that contribute to the economic, social and cultural wellbeing of the region's people and communities.

Similarly, Te Whanaketanga 2050 describes outcomes that will:

1. Strengthen our communities by supporting the development of a resilient and sustainable fit for purpose infrastructure network (transport, energy and digital) that supports increased productivity, strengthens our resilience, and provides growth opportunities.
2. Ensure there is strength and diversity across business sectors and within sectors will help the Coast's economy withstand shocks within a sector without disrupting the economy as a whole.
3. Create a resilient future economy that will see current sectors grow and adapt to change as well as encourage growth in other sectors. A resilient economy will provide employment opportunities across all skill levels. It will support businesses from start-ups, small to medium enterprises, and the largest global corporations.

DWC submits these matters are very important for ensuring community well-being on the West Coast. It is DWC's opinion that the RPS objectives and policies articulate the matters very well and proposes these be included in the plan. This then means they form part of the plan rather than being other matters to be given effect to and assists to integrate objectives and policies at a regional level into the more localised consideration of matters. This also recognises that the plan is being developed on a regional basis to ensure coordination of, and consistency with, regulatory provisions across the District's.

Decision Sought:

DWC seeks that a new set of strategic objectives and policies be placed in this section of the plan and suggests the following title objectives and policies:

Sustainable Communities and the Use and Development of Resources

Strategic Objectives

1. To enable sustainable and resilient communities on the West Coast.
2. To recognise and provide for the role of resource use and development on the West Coast and its contribution to enabling people and communities to provide for their social, economic and cultural wellbeing.
3. This region's planning framework enables existing and new

economic use, development and employment opportunities while ensuring sustainable environmental outcomes are achieved.

Strategic Policies

1. To sustainably manage the West Coast's natural and physical resources in a way that enables a range of existing and new economic activities to occur, including activities likely to provide substantial employment that benefits the long term sustainability of the region's communities.
2. Enabling sustainable resource use and development on the West Coast to contribute to the economic, social and cultural wellbeing of the region's people and communities.

For the purposes of preparing, changing, interpreting and implementing Te Tai o Poutini Plan all other objectives and policies in all other chapters of Te Tai o Poutini Plan are to be read and achieved in a manner consistent with these strategic objectives and policies.

5. Concluding Recommendations

Overall, Development West Coast (DWC) is supportive of the development a combined plan for the region to achieve the purpose of the Resource Management Act at the district level. We support collaboration between the Councils in regard to these matters.

It is imperative that the regulatory policies that determine how we use and manage our natural and physical resources are effective, consistent and efficient enabling documents that assist economic development in a manner appropriate to the West Coast.

In February 2022 Te Whanaketanga Te Tai Poutini West Coast Strategy 2050 was officially launched. Over 150 people from across the West Coast participated in workshops held to design the strategy. The workshops involved business people, central government, local government, unions, mana whenua, rangitira and the wider community. With the promotion of social, economic, environmental, and cultural well-being of communities, Te Whanaketanga proposes to deliver on intergenerational outcomes comprised of three key missions: build confidence, diversify and strengthen our economy, and strengthen our communities.

In order to deliver on the mission of Te Whanaketanga 2050, DWC and our partner organisations, are reliant on working with enabling, effective and efficient regional policies that support the creation of a sustainable, inclusive and prosperous future for Te Tai Poutini.

DWC would appreciate the opportunity to speak to this submission.

Yours faithfully



Heath Milne
Chief Executive