Minerals West Coast submission to West Coast councils on “Are there too many councils on the Coast?”

July 2026

To: West Coast Councils | Are there too many Councils on the West Coast?

From: Minerals West Coast, info@mineralswestcoast.org.nz

INTRODUCTION TO MINERALS WEST COAST

Minerals West Coast is an industry organisation representing the shared and collective interests of people and businesses operating in the minerals sector of the West Coast region.

Our membership is diverse, spanning individuals engaged in part-time or fulltime minerals exploration and mining operations and associated services, through to small and medium-sized, family-owned enterprises, all the way to large companies with international shareholdings.

Explorers and miners on the West Coast produce, or seek to produce a variety of minerals via a range of methods. This includes gold from alluvial and hard rock deposits, sub-bituminous coal as a source of energy for food production and space heating, bituminous coal for steelmaking, aggregates and gravels for roading and construction, limestone for fertiliser, pounamu (often as a by-product of gold mining), and mineral sands producing industrial minerals and rare earth elements.

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INTRODUCTION TO THIS SUBMISSION

Minerals West Coast welcomes the opportunity to submit on West Coast councils’ public consultation, “Are there too many councils on the Coast?”

We invite engagement with councils on the proposals made in this submission.

Guiding principles

In providing our feedback to this public consultation, Minerals West Coast applies the following guiding principles:

> Democracy, including openness and transparency with the community
>
> Accountability to the community, and engagement with the community
>
> Article 3 of te Tiriti o Waitangi "guarantees Māori the King's protection and all rights and privileges of British subjects, establishing the principle of equity and fairness", i.e. all NZers are equal before the law
>
> Universal human rights – no discrimination in favour of some groups against others, and freedom of speech (UN Universal Declaration of Human Rights 1948)
>
> Rule of law, and access to natural justice for those subject to government regulation

EXECUTIVE SUMMARY / RECOMMENDATIONS

Amalgamation of the four West Coast councils (Scenario A) will lead to reduced costs of local government in the region, while offering increased benefits, such as:

- Synergies to improve the effectiveness and efficiency of services provision, while reducing bureaucracy
- Attracting higher quality applicants for jobs because of greater and more fulfilling work, or a career challenge
- The above will include higher-quality leadership and management to deliver outcomes that benefit West Coasters
- It will also include building in-house capability and capacity for services delivery, e.g. processing resource consent applications
- Prioritisation of service delivery to provide more value to the community, in a culture of openness and transparency
- Removal of unnecessary regulatory duplication, and the enabling of businesses

Minerals West Coast makes the following recommendations to the West Coast councils in deciding on the path for local government reform in the region:

a) Choose Scenario A as the preferred path for the reform of West Coast councils because it will lead to improved capability and capacity, delivering better outcomes for West Coasters

b) Add value to a new unitary authority by using a hub-and-spoke model of services delivery

c) Assess and process regulatory approvals in house, e.g. resource consent applications, and by applying a culture of service

d) Introduce a modern and constructive monitoring, compliance and law enforcement culture

e) Ensure unitary authority compliance with the Health and Safety at Work Act 2015, and related secondary legislation

f) Ensure proactive, positive and open engagement with the community

g) Trial a one-stop shop to streamline regulatory approvals, e.g. in relation to environment, conservation and heritage matters

h) Replace Te Tai o Poutini Plan with a fit-for-purpose regional spatial plan that reflects the government's resource management reforms

DRIVER FOR LG REFORM

From the website, West Coast councils provide the following information:

> "Councils have been given a choice:
>
> Develop a locally led proposal through the Head Start pathway or
>
> Move into a Central Government- led backstop process"

The inference Minerals West Coast takes is that the West Coast councils wish to be proactive in leading local government reform. The website provides the following suggested scenarios for LG reform:

Scenario A: One Council for the Coast, an amalgamated unitary authority

POTENTIAL OPPORTUNITIES	QUESTIONS TO TEST
Simplifies governance by creating once council for the coast.	How would local voice be protected across Buller, Grey, Westland and smaller communities?
Could improve regional planning, infrastructure coordination and service delivery alignment.	What local boards, community boards or local leadership arrangements would be needed?
May reduce duplication and provide a stronger collective voice to Central Government.	What would the financial and rating impacts be?
Could help protect and strengthen regional capability if designed well.	How would local services be maintained across a large geography?

Scenario B: Grey-Westland unitary authority with separate Buller arrangement

POTENTIAL OPPORTUNITIES	QUESTION TO TEST
Could reflect some existing economic, transport, tourism and service connections between Grey and Westland.	How would regional functions be delivered across Buller?
Creates a larger structure than current district arrangements.	Would this fragment West Coast-wide planning and advocacy?
Could improve coordination across shared infrastructure and services in the central and southern Coast.	How would this model support emergency management, resilience and infrastructure coordination across the whole Coast?

Scenario C: What alternative options or local voice arrangements are we missing?

We want to know whether communities can see other options, combinations or local governance arrangements that should be explored further.

MINERALS WEST COAST COMMENT

Scenario A – one unitary authority - is the logical LG solution for a regional population of 34,000.

Consider that Auckland Council caters to a population of 1.8 million, which is 53 times greater than that of the West Coast region.

Problem definition

The West Coast region is over governed: around ten times more elected representatives than the New Zealand average, and correspondingly four bureaucracies when one would suffice.

The reasons for the current situation are historical, and, therefore, anachronistic – like everyone else, LG today has available to it the latest in IT including online meetings, modern machinery including drones, highly educated people, to name a few advances in recent decades. LG in New Zealand, including on the Coast, needs to catch up.

Over-government is among reasons West Coast regional rates are high, and among the fastest growing in the country.

Opportunities

Synergies

Amalgamation offers opportunities for synergies, and that is the efficient and effective approach to services delivery across this widely extended region. A key part of achieving this is being able to build a higher-quality and more effective workforce at a unitary council, including leadership and management.

This does not mean centralisation of all LG services provision infrastructure, equipment and labour in, say, Greymouth. The alternative of a hub-and-spoke model would envisage hubs extending to the north and south, and up the Grey / Māwheranui river valley to Reefton.

On this basis, the existing LG units in Westport and Hokitika would remain, as would a staffing capability and capacity, including leadership and management.

Having one unitary authority also eases the path for relations with local and regional iwi / hapū, reducing the burden of cost and time to Māori, as well as to LG.

Prioritisation and focus

A unitary authority will provide for LG on the West Coast to prioritise its activities, for example:

- Build in-house capability and capacity in assessing and processing regulatory approvals, e.g. resource consents
- Replace an at-times aggressive regulatory compliance culture with a modern, inclusive, constructive, and interactive compliance business model and practice

- Build an in-house understanding of the workplace health and safety reform passed in 2015 and secondary legislation, to avoid compliance staff committing breaches of the Health and Safety at Work Act 2015
- Proactive and positive engagement with the community in a spirit of openness and transparency, on the issues that matter to West Coasters

Remove unnecessary regulatory duplication

Among objectives for LG reform would be to also remove unnecessary regulatory duplication, and associated unnecessary time and cost, by replacing it with a one-stop shop for regulation.

For more detail on this proposal, please refer to the Tailored Energy Solutions Limited proposal, submitted to the Department of Internal Affairs in December 2025 as feedback to the public consultation, "Simplifying local government" (attached). This would bring into one process approvals under:

- Resource management legislation
- Conservation law
- Heritage law

Enabling a prosperous West Coast

The West Coast is a scenic region of New Zealand, endowed with conservation land, as well as farming, forestry, tourism, and mining opportunities. Resource management planning needs to cater for the multiple and varied land-uses in the West Coast region.

Te Tai o Poutini Plan struggles with workability, because, among other issues, it has adopted RMA national direction inherited from the previous government that has become obsolete, or that is intended to become obsolete. Following are examples of problems with TTPP:

- Treatment of biodiversity and freshwater, and especially as regards wetlands, being ecosystems which in the region are ever-present – "the West Coast is a wet land".
- A distinction in treatment is made in TTPP between metallurgical coal and thermal coal, while the previous government recognised thermal coal production as an "essential service" and later as a "key utility" during times of Covid-19 restrictions.
- The decisions version of TTPP made unprofessional choices such as upholding the Department of Conservation's views on future demand for coal – the point is that DOC cannot be an expert on coal, and that this expertise lies with the people who produce and distribute coal.
- The provisions on kaitiakitanga rights and responsibilities for iwi in relation to resource management planning and consenting are unclear, meaning these will require subsequent interpretation, and potentially court action, to clarify these provisions.

A culture of service

LG exists to serve the community, while being accountable to the community, and paid for by the community. In terms of West Coast businesses, the attitude of LG towards these businesses needs to be enabling and constructive, e.g. in relation to processing and awarding regulatory approvals (always subject to conditions), and subsequent monitoring, compliance and enforcement.

APPENDIX 1:

Tailored Energy Solutions Limited submission to the Department of Internal Affairs / Ministry of Cities, Environment, Regions and Transport on "Simplifying local government"

December 2025

INTRODUCTION

Established in 1969 TESL is an energy supply company based in Canterbury. TESL supplies solid fuel process heat to the primary processing industry throughout the South Island. The TESL core business revolves around seeking coal supply from independent South Island coal producers, blending coals for efficiency and environmental constraints, before suppling to large industry sites.

Coal currently underpins the South Island's process heat energy; no other option offers the security of affordable energy supply at this time.

Over the past five years four working coal mines in the South Island have closed due to government policy and market forces. This has applied pressure to remaining coal producers to increase capacity to supply existing markets, further reducing the resilience of the energy market of New Zealand.

The proposed reform of regional councils is, therefore, of key interest to the minerals value chain in New Zealand.

We welcome the opportunity to provide feedback on the government's proposals for simplifying local government. We provide proposals of our own for the government's consideration, aimed at strengthening local democracy.

This submission is structured as follows:

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ONE-STOP SHOP FOR REGULATION IN REGIONS

To enable Tai Poutini / West Coast regional and New Zealand economic development to progress, we suggest replacing regional councils with a "One Stop Shop" regulation framework.

This would suit the West Coast region, because the present arrangement of four territorial authorities across 34,000 people on the West Coast has proven too cumbersome to enable infrastructure and minerals projects to proceed in a timely and cost-effective manner, unnecessarily placing the region's resilience at risk.

To resolve this, we propose replacing regional councils' functions re land-use law and regulation with a One-Stop-Shop that takes in, for example:

- District councils (now also exercising former regional council statutory functions and powers, under the Resource Management Act 1991)
- Department of Conservation (access arrangements to public conservation land, concessions, wildlife authorities)
- Iwi (so they can participate in the exercising of statutory functions and powers, as for all New Zealanders – we are a united nation; we are all paddling in the same waka)
- Heritage NZ Pouhere Taonga (archaeological authorities)

Objective

Under a One-Stop Shop, the above authorities, and directly affected parties consider a project application at the same time, and collectively agree on resource consent conditions, and finalise other regulatory approvals where relevant, in a timely and cost-effective manner, to deliver net benefits to the economy, society and the environment – i.e. to deliver sustainable outcomes.

Structure

We propose the One-Stop Shop is overseen by an executive board comprising the following representation:

- Territorial authority (chair)
- Territorial authority (deputy chair)
- Department of Conservation
- Tangata whenua
- West Coast business
- Community
- Environmental NGOs

The board would determine its own terms of reference and process, subject to guiding principles. We propose the following guiding principles for the One-Stop Shop board:

- Democracy, including openness and transparency with the community
- Accountability to the community, and engagement with the community
- Article 3 of te Tiriti o Waitangi – all NZers are equal before the law
- Universal human rights – no discrimination in favour of some groups against others (UN Universal Declaration on Human Rights 1948)
- Rule of law, and access to natural justice for the regulated

The board would develop a pathway for project proponents to simultaneously apply for approvals under the following legislation:

- Resource Management Act 1991 or replacement legislation (resource consent, or natural resource permit)
- Crown Minerals Act 1991 (access arrangement to Crown land, where relevant)
- Conservation Act 1987 (concession, where relevant)
- Wildlife Act 1953 (wildlife authority, where relevant)
- Heritage NZ Pouhere Taonga Act 2014 (archaeological authority, where relevant)

In terms of Crown minerals permits, the regulatory process under the Crown Minerals Act would be separate, because this is not about land-use, rather about property rights to Crown-owned minerals.

Regulatory pathway

A One-Stop Shop regulatory pathway could look like the following:

> *Step 1:* Project proponent applies for a bundle of One-Stop Shop land-use approvals, having prepared a single assessment of environmental and heritage effects that meets all legislative requirements.
>
> *Step 2:* The One-Stop Shop board assigns a case manager to the project proponent, drawn from the applicable territorial authority.
>
> *Step 3:* The case manager oversees the processing by relevant agencies of all required regulatory approvals, under applicable legislation, and will report to the board on progress.
>
> *Step 4:* This will include caucusing of decisionmakers under different legislation to reduce the quantity of experts and consultants involved, and align conditions of approvals for ease of implementation, and monitoring, compliance and law enforcement
>
> *Step 5:* On completion of all processing of the application, the project proponent receives a bundle of land-use approvals under all applicable legislation
>
> *Step 6:* In the event of an adverse decision, relevant appeal rights apply; that also applies to eligible project opponents, in the event of a positive decision
>
> *Step 7:* Local government has the sole responsibility for monitoring, compliance and law enforcement of all regulatory approvals

One benefit is that the management method for freshwater ecology, for example, would be the same under a resource consent, an access arrangement, and / or a concession.

Next steps

We propose a trial of the One-Stop Shop concept in the West Coast region, ahead of a national roll-out. In this way, policymakers can iron out any weaknesses of a new system, and then implement it nationwide.

We are confident that such a trial could be set up within a 2 to 3-month period, as was the case for the Pike River Recovery Agency.

Note that existing WCRC staff would be available to work alongside industry, government and other players under the new structure to enable a prosperous and environmentally and socially responsible West Coast community.

> Recommendation 1: Trial the above proposals for One Stop-Shop regulation in the West Coast region to assess fitness for purpose, prior to a nationwide rollout

ANSWERS TO SPECIFIC QUESTIONS IN THE CONSULTATION DOCUMENT

What do you think? Do you agree there is a need to simplify local government? What do you think of the proposed approach overall?

Local government has too many layers, as does the exercise of regulation in regions. Many people in communities don't know who their regional councillors are, or what their regional council does. We agree with the government's rationale for simplifying local government, i.e. that having more than one council governing a city or district can lead to confusion, and poor outcomes for local communities.

It's overly complicated for resource consent applicants to have to apply for a bundle of consents from two or more councils.

The proposal to remove an extra layer of elected representation will help make local government more transparent to ratepayers and communities, and thereby improve public accountability of elected leaders and decisionmakers.

Having said that, we consider it is necessary to take further steps, i.e. to establish a One-Stop Shop for regulatory processes for land-use. This is to achieve an aim of timely and cost-effective regulation, to enable environmentally and socially responsible projects (refer to Recommendation 1).

A unitary council is an opportunity to improve in-house capability and capacity for better services delivery to West Coasters, and to put an end to outsourcing the processing of resource consent applications to organisations that are not based on the West Coast, and do not have familiarity with our region.

What do you think? Do you agree with replacing regional councillors with a CTB? What do you like or dislike about the proposal to replace regional councillors with a CTB? What level of Crown participation in regional decision-making do you prefer?

The West Coast region is over-governed locally by about 10 times compared with the national average, per head of population. Removing regional councillors is a first step towards reducing over-government at a local level on the West Coast.

> Recommendation 2: Absorb regional council statutory functions and powers into existing district councils, and rationalise staffing across councils

Instead of a CTB, we propose a One-Stop Shop for administering regulation under, e.g. the RMA, Conservation Act, Wildlife Act, Crown Minerals Act (access arrangements to Crown land), and the Heritage NZ Pouhere Taonga Act (refer to Recommendation 1).

Ratepayers expect territorial authorities to be accountable to them, and so local government accountability mechanisms need strengthening.

> Recommendation 3: Set key performance indicators on councils, in consultation with the community, and regular reporting to the community against those KPIs, to improve public accountability of local government

The fact that only 50% of eligible voters on the West Coast turned out to vote at the recent local body elections means – we believe – that the community has by and large lost interest in participating in local democracy. The region needs to involve West Coasters in local democracy by motivating them to participate.

> Recommendation 4: District councils to commit to openness and transparency with the community, accountability, and to engaging actively with the community to help encourage people to feel their vote counts in local body elections

What do you think? Do you agree that mayors on the CTB should have a proportional vote adjusted for effective representation? What do you like or dislike about the voting proposal for the CTB?

We do not support the concept of a combined territorial board (CTB), for the reasons given above, and propose as an alternative, a One-Stop Shop for regulation (refer to Recommendation 1).

What do you think? What do you think about the ways that communities crossing regional boundaries could be represented?

This is an important point. Under a One-Stop Shop, the boundary between, say, Buller and Grey Districts would no longer be relevant. Both districts are part of the wider West Coast region. In the case of regulated activities that straddle regional boundaries, two different One-Stop Shops would apply. There needs to be a commonsense mechanism that brings the two together under one umbrella.

What do you think? Do you support the proposal to require CTBs to develop regional reorganisation plans? What do you think about the criteria proposed for assessing regional reorganisation plans?

We agree that a new system of local government needs to apply certain criteria, and we note the proposed criteria are: big-picture fit, affordable now and in the future, better services, clear leadership, local say, Treaty arrangements, and “can it be done”.

We think the criteria need to include upholding democracy and related matters, such as upholding property rights, human rights (e.g. freedom of speech, and freedom from discrimination), the rule of law, and natural justice for participants in regulatory processes (refer to our proposals for One-Stop Shop regulation).

It is noted that an increasing number of WCRC staff are spending more time monitoring holders of existing resource consents for compliance with conditions, instead of reducing a backlog before it of more than 200 resource consent applications. Some resource consent applications for gold mining are taking 2 years to process; this, at a time of record high gold prices. This is unacceptable.

The following text from the consultation document is unclear – "show how all Treaty settlement commitments that are administered by councils and other agreements with iwi/Māori will be given effect to and/or improved?"

If "agreements" mean that iwi have a de facto veto power over resource consent applications – which is currently the case in the WCRC - or can carry out joint planning with the council behind closed doors, or monitor conditions of resource consents at the consent holder's cost (when this is the council's job), then this violates basic principles of democracy, the rule of law, access to natural justice, and human rights.

This is because mayors and councillors are elected by, and are accountable to the community, whereas iwi leaders are not; they are accountable to iwi members.

> Recommendation 5: Ensure that local bodies exercise statutory functions and powers without delegating them de facto to parties who do not represent the community, and are not elected by the community

What do you think? What do you think about how the proposal provides for iwi/Māori interests and Treaty arrangements?

In our view, West Coast iwi and Māori are members of the West Coast community, as are all who live in the West Coast region.

New Zealand is "a united nation" that must uphold universal human rights for all who live in our country, including the 28.8 % who were not born in New Zealand (2023 Census data).

Iwi / Māori should be able to participate in local democracy and local government, as all New Zealand citizens and residents are entitled to do.

We say this because one of the signatories to te Tiriti o Waitangi 1840 no longer exists. The British colonial power has been replaced by "the Crown", which is everyone in New Zealand – i.e. Māori and non-Māori, iwi and non-iwi groups.

New Zealand is today a democracy – as opposed to the situation in 1840 – and democracy is, notionally, "one person, one vote". If a Māori person wants to be a councillor in local government, that person can campaign and get elected, as everyone may do.

We urge care in interpreting the meaning of local iwi being able to "participate" in council decisionmaking on resource consent applications, and to "assist" councils in the exercise of their powers and functions (compare s58M, RMA), reproduced overpage (emphasis added):

> 58M Purpose of Mana Whakahono a Rohe
>
> The purpose of a Mana Whakahono a Rohe is—
>
> (a) to provide a mechanism for iwi authorities and local authorities to discuss, agree, and record ways in which tangata whenua may, through their iwi authorities, **participate** in resource management and decision-making processes under this Act; and
>
> (b) to **assist** local authorities to comply with their statutory duties under this Act, including through the implementation of sections 6(e), 7(a), and 8.

In the West Coast region, these words have come to mean that WCRC have provided to iwi a *de facto* veto power over who gets resource consents and who does not. We can provide evidence of this behaviour on request.

The Natural Environment Bill and the Planning Bill introduced into Parliament in December 2025 do not address this problem.

This practice of effectively out-sourcing to iwi a legislated role of local government introduces two parallel and costly processes for processing resource consent applications. This in turn raises the risk of double jeopardy for applicants, one party, say, being willing to accept proposed consent conditions, and the other modifying them as a requirement for consent approval.

For example, Tai Poutini iwi, not WCRC, are writing conditions on resource consents, especially as regards freshwater management, and that includes a requirement for iwi monitoring of those conditions (at the resource consent holder's cost). This usurps the role of local government, and adds unnecessary cost to resource consent holders.

All of this violates the rule of law, denies natural justice to resource consent applicants, and is unacceptable.

The question has to be asked: who is in charge of local government on the West Coast – elected local government, or non-elected iwi? The former is democracy in action; the latter is not.

Care is also needed with interpreting the following text from the consultation document, "Further, CTBs will be required to comply with all existing provisions of the Local Government Act 2002, for example: · establishing and maintaining processes for Māori to contribute to decision making · ensuring opportunities for consultation with Māori."

As discussed above, if this means that iwi / Māori occupy a privileged role in decisionmaking and in influencing or directing local government processes – compared with the rights and responsibilities of the community at large - then this would be a failure to uphold democracy, and a failure to uphold Article 3 of te Tiriti o Waitangi, text in both versions reproduced below:

> Translation into English of te reo Māori version - For this agreed arrangement therefore concerning the government of the King, the King of England will protect all the ordinary people of New Zealand and will give them the same rights and duties of citizenship as the people of England.
>
> English version - In consideration thereof Her Majesty the King of England extends to the Natives of New Zealand Her royal protection and imparts to them all the Rights and Privileges of British Subjects

As to Treaty settlements and related arrangements, this is about property rights, and redress for historical and contemporary breaches of the Treaty. In general, we support the Treaty settlement process.

> Recommendation 6: Amend s58M and s58N, RMA, to prevent the WCRC providing iwi with a *de facto* veto power over resource consent applications, and to carry the changes through to the Natural Environment Bill and the Planning Bill accordingly, both currently before Parliament
>
> Recommendation 7: Uphold Article 3 of te Tiriti o Waitangi by ensuring that members of regional communities have equal rights and responsibilities in local government processes, to uphold democracy

CONSOLIDATED RECOMMENDATIONS

Recommendation 1: Trial the above proposals for One Stop-Shop regulation in the West Coast region to assess fitness for purpose, prior to a nationwide rollout

Recommendation 2: Absorb regional council statutory functions and powers into existing district councils, and rationalise staffing across councils

Recommendation 3: Set key performance indicators on councils, in consultation with the community, and regular reporting to the community against those KPIs, to improve public accountability of local government

Recommendation 4: District councils to commit to openness and transparency with the community, accountability, and to engaging actively with the community to help encourage people to feel their vote counts in local body elections

Recommendation 5: Ensure that local bodies exercise statutory functions and powers without delegating them de facto to parties who do not represent the community, and are not elected by the community

Recommendation 6: Amend s58M and s58N, the RMA, to prevent the WCRC providing iwi with a *de facto* veto power over resource consent applications, and to

carry the changes through to the Natural Environment Bill and the Planning Bill, both currently before Parliament

Recommendation 7: Uphold Article 3 of te Tiriti o Waitangi by ensuring that members of regional communities have equal rights and responsibilities in local government processes, to uphold democracy