### 6/10/2025



Hon. Kit Toogood KC **Expert Panel Chair** Taranaki VTM Project

Submitted via email to: substantive@fasttrack.govt.nz

Tēnā Koutou,

## Re: Taranaki VTM Project

Thank you for the opportunity to comment on the Taranaki VTM Project being considered under the Fast-track Approvals Act 2024 (the Act).

The Rangitīkei District comprises 4,500 square kilometres of largely rural land. It is a diverse district, ranging from sand plains on the south coast to hill country in the upper Rangitikei. The district is characterised by its hills, which comprise 50% of the land and the Rangitīkei River, one of New Zealand's longest rivers, which starts in the Kaimanawa Ranges and flows out to the Tasman Sea. Key drivers of the Rangitīkei economy are primary production and downstream processing. Primary industries contribute to 30.1% of the District's GDP and provides 28.3% of employment.

Marton is the district's largest urban centre, with a population of approximately 5,500 people. The Rangitīkei coastline is relatively untouched and comprises rugged cliffs, black sandy beaches, and wild surf along the Tasman Sea. It is enjoyed by many for a range of recreational purposes including fishing, surfing, swimming, bird watching and coastal walks.

The primary iwi groups within the Rangitīkei District include Ngā Wairiki Ngāti Apa, Ngāti Raukawa ki te Tonga, Ngāti Tamakōpiri, Ngāi Te Ohuake, Ngāti Raingitūhia, Ngāti Hauiti, and Ngāti Whitikaupeka. Council appreciates the relevant iwi groups involvement in the process and trusts the Panel to take due consideration of their aspirations in the decision-making process.

These comments primarily focus on:

- Economic benefit vs environmental cost
- Iwi opposition

# Economic benefit vs environmental cost

Rangitikei District Council acknowledges that the Project has the potential to generate significant gross economic benefits for the Taranaki region. However, the net economic benefit, after accounting for environmental, social, and cultural costs, remains unclear. Determining whether the adverse effects of the Project are disproportionate to its benefits is, in our view, a key test for the Expert Panel.

Although the primary impacts, both positive and negative, are expected to be concentrated within the Taranaki region, the Rangitīkei District Council shares broader concerns regarding the adequacy of the environmental information provided. We support the Taranaki Regional Council's assessment that the Application currently lacks sufficient detail to fully understand potential impacts on seabirds, marine mammals, and the effects of sediment plumes on sensitive reef ecosystems.

Specifically, for the Rangitikei District, we are concerned about the potential extent and speed of sediment transport, and the possible downstream impacts on our own marine and coastal ecosystems along the Rangitikei coastline.

While the current project area does not directly adjoin the Rangitīkei coastline, there is reasonable concern about the precedent this Project may establish. The Rangitikei Foredunes, identified as a protected Natural Landscape in the District Plan, spans the entire length of the district's coastline. This area plays a critical role in natural coastal processes and erosion control, and is valued for its high natural character, being largely unmodified and free from development. It also holds significant cultural importance for Māori, particularly in relation to spiritual wellbeing and the principles of kaitiakitanga. Should the Project expand in the future, adverse environmental effects could potentially extend closer to, or impact, the Rangitīkei coastline and coastal communities such as Koitiata, Scotts Ferry and Rātana. Rātana is a national pan-iwi community with a strong cultural connection to this coastline.

In summary, while the projected gross economic benefits are acknowledged, Council urges the Expert Panel to undertake a thorough and balanced assessment of its net benefit incorporating all relevant environmental, cultural, and social considerations.

#### lwi opposition

Council does not provide comment on matters of tikanga Māori, as these are most appropriately addressed by mana whenua and iwi authorities who have also been invited to participate directly in this process. However, Rangitikei District Council acknowledges the strong opposition to the Project from local iwi groups in Taranaki.

Rangitikei iwi have expressed their support for Taranaki iwi in opposing the Project, and Council recognises and respects the unity and shared concerns expressed by tangata whenua across regional boundaries.

#### Conclusion

Rangitikei District Council appreciates the opportunity to provide comment and encourages the Expert Panel to give full weight to the breadth of potential effects; economic, environmental, and cultural, when assessing the application. The Council trusts that a precautionary and evidence-based approach will be taken in the Panel's decision making.

Ngā mihi,

Andy Watson

Mayor of the Rangitīkei

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