

# **Waikato Regional Policy Statement Review - Discussion Document**

## **Summary of feedback** (as at 22 June 2009)



# Executive summary

The Waikato Regional Policy Statement (RPS) is under review with the intention of notifying the 'second-generation' RPS in August 2010. Environment Waikato released a discussion document in March 2009 for the purpose of initiating discussion with regional stakeholders about the review. It provided an overview of the main areas the RPS could cover.

This report summarises the feedback received by Environment Waikato to mid-June 2009. This feedback is being used to help shape the draft RPS which will be released late-2009.

The RPS Discussion document was sent the week commencing Monday 9 March 2009 to the following key stakeholders:

- Environment Waikato Councillors
- The CEOs of the region's 12 territorial authorities
- The CEOs of the five adjacent regional councils
- Iwi Representatives
- The RPS Reference Group
- Approximately one hundred representatives of central government ministries, scientific / research institutes, industry, energy companies, and NGOs<sup>1</sup>.

Over 60 individual pieces were received between mid-April and the end of June 2009. Feedback was received from the following:

- |                                    |                |
|------------------------------------|----------------|
| • Territorial authorities –        | 8 <sup>2</sup> |
| • Regional councils –              | 1              |
| • Iwi / Tangata whenua –           | 3              |
| • Environment Waikato staff –      | 3              |
| • Farming / primary production –   | 7              |
| • Fertilizer –                     | 2              |
| • Energy –                         | 9              |
| • Forestry –                       | 2              |
| • Minerals / mining / quarrying –  | 4              |
| • Ministries / Government bodies – | 5              |
| • Transport –                      | 2              |
| • Environmental organisations –    | 9              |
| • Individuals –                    | 4              |
| • Other organisations –            | 4              |

Environment Waikato has been extremely pleased with, and is grateful for, the high standard of feedback received. There has been some careful thinking throughout the community on those issues affecting us all and what can be done to address them. The guidance provided will certainly assist the job of reviewing the Regional Policy Statement and turning it into a document that will serve the community well into the future.

There are no plans to refine the Discussion Document. It has served its purpose well. The feedback will inform the next phase of the Regional Policy Statement review process, a draft planned for a late 2009 release.

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<sup>1</sup> This list was compiled by the RPS Review team in consultation with the RPS Steering Group and is available on request.

<sup>2</sup> This number includes a joint submission by Matamata-Piako, Hauraki and South Waikato District Councils.



# Contents

Executive summary	i
Discussion document	v
Feedback	vii
General	1
1 Biodiversity	7
2 Air	16
3 Water	21
4 Soil	28
5 Marine	32
6 Geothermal	34
7 Natural hazards	35
8 Hazardous substances and contaminated land	40
9 Waste	44
10 Historic heritage, landscape and natural character	45
11 Public access	50
12 Matters of significance to Maori	52
13 Energy	54
14 Climate change	60
15 Growth and development	63
16 Transport and other infrastructure	69
17 Minerals	73



# Discussion document

As part of the review of the Operative Regional Policy Statement and to gauge stakeholder sentiment on current and emerging issues, Environment Waikato released a discussion document in March 2009. This initiated discussion with key regional stakeholders about the review of the Waikato Regional Policy Statement.

It provided a snapshot of resource condition and officials understanding of present and potential future issues affecting the management of natural and physical resources within the region.

It incorporated information available to date about the quality and quantity of those resources local government collectively is charged with managing under the Resource Management Act 1991.

It posed a number of questions relating to potential management targets and relied on current objectives, community outcomes and recent resource monitoring information for this process. Questions were also posed regarding possible policies and methods to pursue. These were guided by the evolving role of the Regional Policy Statement, the 2007 evaluation by Enfocus Consultants of the Operative Regional Policy Statement and the recognition of the current fluid policy environment in the form of National Policy Statements, legislative changes and Treaty of Waitangi settlement negotiations. A wide range of questions were posed to assist with the analysis of costs and benefits of pursuing different policy options.

Environment Waikato has been extremely pleased with, and is grateful for the high standard of feedback received. There has been some careful thinking throughout the community on those issues affecting us all and what can be done to address them. The guidance provided will certainly assist the job of reviewing the Regional Policy Statement and turning it into a document that will serve the community well into the future.

There are no plans to refine the Discussion Document. It has served its purpose well. The feedback will inform the next phase of the Regional Policy Statement review process, a draft planned for a late 2009 release.

Thank you to those who provided feedback. All attempts have been made to faithfully summarise the points made in the following sections. The full text of feedback received is being used for the development of the draft.



# Feedback

Feedback was received from the following stakeholders:

Organisation
AA
Advisory Committee for the Waikato Regional Environment (ACRE)
Aggregate and Quarry Association of New Zealand (Inc)
Ballance Agri-Nutrients Limited
Brown, TW (individual)
Byfords Construction Co Ltd
Cambridge Chamber of Commerce
Carter Holt Harvey Ltd
Clark, K (individual)
Contact Energy Limited
DairyNZ
Department of Internal Affairs
Department of Conservation – Tongariro Taupo, Bay of Plenty and Waikato Conservancies
Department of Corrections
ECOplus
Edens, S (individual)
Energy Efficiency and Conservation Authority (EECA)
Environment Bay of Plenty
Environment Waikato
Federated Farmers of New Zealand
Fonterra Co-operative Group Limited
Forest & Bird
Franklin District Council
Genesis Energy
GNS Science
Hamilton City Council
J Swap Contractors Ltd
Johns, W (individual)
Latitude Planning Services
Matamata-Piako, Hauraki and South Waikato District Councils (“The Councils” is the name given to the joint submission)
Mighty River Power
Ministry of Education
Natural Solutions
National Wetland Trust of New Zealand
Newmont Waihi Gold
New Zealand Fertiliser Manufacturers’ Research Association Inc
New Zealand Forest Managers Ltd

New Zealand Historic Places Trust
New Zealand Minerals Industry Association
New Zealand Police
New Zealand Pork
New Zealand Transport Agency
Ngati Tuwharetoa Maori Trust Board
Poultry Industry Association of New Zealand and Egg Producers Federation of New Zealand
Rotorua District Council
Scanlen, DF (individual)
Solid Energy New Zealand Limited
Tatua
Taupo District Council
Te Kotuku Whenua & Tainui Hapu
Thames-Coromandel District Council
Transpower New Zealand Limited
TrustPower Limited and King Country Energy Limited
Vector Limited
Waikato Biodiversity Forum
Waikato District Council
Waikato-Tainui Te Kauhanganui Incorporated
Wairakei Pastoral Ltd
Waitomo District Council
WEL Networks
Whangamata HarbourCare Incorporated





# General

## **Advisory Committee for the Waikato Regional Environment (ACRE)**

1. Document has serious gaps and lacks a vision for the region.
2. Threats not mentioned include unsustainable farming practices and world market expectations; earthquakes, volcanic activity and tsunamis; and peak oil and its effect on industry, transport and living in general.
3. Need an introductory section which places in context the value of our natural capital, the value of ecosystem services and the need for stewardship for future generations.
4. Document does not link with Community Outcomes. Suggest different structure for document based on s5 RMA
5. Need for better accountability – Environment Waikato has poor track record of accountability in meeting RMA objectives (also need for regulatory controls as opposed to education).

## **Ballance Agri-Nutrients Limited**

1. A defined and prioritised approach to the region's issues is required to set out management regimes and targets that are achievable and affordable.
2. Prioritised approach to the region's issues must be addressed within the proposed RPS. Four main priority topics/issues for the region are:
  - Freshwater (classification of all water bodies, application of management standards/guidelines, ongoing monitoring);
  - Land and soils (inappropriate subdivision and use of most versatile soils, soil mapping and classification of use, ongoing monitoring);
  - Air (adverse health effects from cumulative or point source discharges from home heating and vehicles, ongoing monitoring, reverse sensitivity);
  - Growth and development (reverse sensitivity, integration with energy, transport and infrastructure).All other topics identified in discussion document important to region but not of immediate priority.
3. Concerned that Environment Waikato proposing to cease future management of effects on regional air quality under the National Environmental Standard while continuing management of cadmium accumulation (when latter has no significant adverse effects on public health or the environment).

## **Carter Holt Harvey**

1. There is no exploration in the discussion document generically or under each theme of the benefits of resource use, or of the need for balance between production and protection.
2. Seeks the discussion document be amended and regional policy be developed to identify and provide for the specific tradeoffs being made between ecological and social/economic outcomes.
3. Regional policy should be explicit that 'ideal' environmental outcomes are not necessarily practical, and that the individual objectives under any particular theme will reflect a compromise between competing interests in almost all situations.
4. Supports the recognition that growth and development are desirable and that constraints exist in the form of sunk costs in existing development.
5. Considers there is potential conflict between the recognition that growth and development are desirable and other principles such as "where resource quality is good, this should be maintained".
6. Establish a clear framework for Environment Waikato's decision-making in formal policy. Seek first principle is deleted.

## **Wairakei Pastoral Ltd**

1. Discussion document fails to recognise and provide for economic growth of the region in an enabling way as required by s5(2) RMA. In particular, it fails to

recognise the importance of pastoral farming to the regional and national economies, and it makes no provision for the sustained growth of the agricultural sector during the next 10 years.

### **Environment Bay of Plenty**

1. Rename the Community Wellbeing theme as many topics underneath relate to the management of natural resources. Alternatively, some themes could be placed under other headings to best reflect their primary management purpose.
2. Ensure that the power and mandate of Environment Waikato to act are clearly identified for each topic. Environment Bay of Plenty proposes to link regional form and development, transport, energy and climate change together in new RPS, with regional form regarded as the driving factor.

### **Edens, S (individual)**

1. Concerned that Environment Waikato is trying to be involved in functions that are primarily the responsibility of territorial authorities.
2. Encourages support for cost-effective approaches.

### **Federated Farmers of New Zealand**

1. RPS should have a more positive view of farming. Reservations over use of term "intensive agriculture". Clear distinction between normal pastoral farming and non-pastoral farming needs to be imbued within the RPS.
2. RPS should not be restrictive so should focus on non-regulatory methods.
3. Self-regulation, in some circumstances, may be the most efficient and cost effective means of achieving the purposes of the RMA.
4. RPS should guide policies and plans to have permitted standards – landowners that do not comply will face enforcement action and increased cost of consent regulation – this will ensure that the majority of compliant landowners do not have to face blanket activity regulation.
5. Urge Environment Waikato to direct regional policy away from managing and regulating activities and towards managing effects. Policies, objectives and ERAs should be realistic and achievable within the ten year review period.

### **Fonterra Co-operative Group Limited**

1. Supports the recognition that growth and development will not only continue but are desirable and should be enabled where effects on the environment can be avoided, remedied or mitigated.

### **Hamilton City Council**

1. Supports FutureProof being incorporated into the RPS.
2. Supports the RPS responding to the settlement between Waikato-Tainui and the Crown.
3. Requests that the RPS provide clarity around what is expected to be achieved via district plans.

### **Newmont Waihi Gold**

1. Supports the submission of New Zealand Minerals Industry Association.
2. Notes that the current RPS is very simple to follow.

### **Ken Clark (individual)**

1. Environment Waikato should stick to principles in protecting what remains of our natural heritage – should set a good example in administering its own estate; should be consistent.

### **Ministry of Education**

1. The MoE is interested in any changes to resource management policy that may affect any of the Ministry's schools in the region.

2. Supports establishment of indicators for tracking degradation of environment; more support for local community groups; avoid ambitious targets and focus on key achievable issues; consider use of Environment Waikato property for recreation.

### **Mighty River Power**

1. RPS needs to include four broad policy directions:
  - Recognise the use and development of resources is an equally important foundation for the RPS as is the protection and management of adverse environmental effects;
  - Recognise the fundamental contribution that a secure electricity supply makes to our developed economy and society and recognise the particular benefits that are derived from the use and development of renewable energy resources;
  - Ensure that a balanced approach is taken to the management of significant environmental values. The RPS should not provide 'blanket' protection and should recognise the direction in s6 of the RMA; and
  - Appropriately manage adverse reverse sensitivity effects on significant infrastructure and to ensure opportunities to develop renewable energy resources are not lost through poorly informed resource management and planning decisions.
2. Structure of the 'five themes' as identified in the discussion document are somewhat arbitrary - there is no need to group the subject areas within one section of the RPS as proposed. Such groupings could lead to unintended interpretations being made about the intent of the provisions.
3. Notes there is a strong focus in the document on the protection and management of adverse environmental effects of human activity which needs to be balanced with the elements of the built environment and human activity that contribute to economic, social and cultural well-being.
4. A careful balance needed so that the RPS does not introduce unnecessary disincentives for investment.
5. Encourage Environment Waikato to use opportunity provided by the RPS review to reduce duplication and thereby streamline the region's resource management policy and plan framework.

### **Taupo District Council**

1. Environment Waikato should take a pragmatic approach in the formulation of this RPS. Since the notification of the current RPS many of the district/city plans within the region have evolved. This process of evolution has often reflected best practice nationally and has certainly required significant investment by local authorities in terms of time and money.
2. Consider it is very important that the RPS recognises this substantial community investment and reflects this previous work in District Plans.

### **Tatua**

1. Environment Waikato is to be applauded for this proactive move for developing what could be the defining document for the growth and prosperity of the region over the next ten to twenty years.
2. The economic consequences of implementing any proposed outcomes of the RPS need to be established.
3. In many cases a compromise will have to be reached between communities' environmental, social and economic objectives.
4. There are no free lunches, if the community truly desires something then the whole community must be prepared to contribute to achieving that outcome.
5. There is currently a high level of confusion and overlap around the roles of local and regional government in some activities.
6. The updated RPS must therefore aim to clarify responsibilities and ensure that any crossover is eliminated, or minimised.

7. Similarly there is potential for crossover between regional and national government. As a general principle, any matter that is dealt with at a national level should not be duplicated at regional level.
8. Performance levels and targets specified in National Environmental Standards should form the basis of those adopted in the RPS. Only in specific cases, where is strong justification for doing so, should more restrictive requirements be set.
9. The primary purpose of including specified targets should be the identification of priorities so that limited resources can be employed to best effect.
10. To ensure ongoing community (particularly rural) support for RPS objectives it is important that existing practices that have been lawfully implemented and are being appropriately managed, are recognised as such.
11. Focus on ensuring that existing controls (whether relating to permitted or consented activities) are being implemented as required.
12. Any additional rules or controls should only be considered where existing measures are fully implemented and are determined to be inadequate.

#### **Trustpower Limited and King Country Energy Limited**

1. Ensure that the provisions implemented within the RPS are not more restrictive than those in the RMA and other statutory documents, and do not preclude sustainable development.
2. RPS should provide provisions that protect lawfully established activities from the effects that may be brought about by new activities.

#### **Rotorua District Council**

1. Notes that the next RPS will give Environment Waikato a stronger role and requests discussions take place with territorial authorities if functions are to be reallocated to the regional council.
2. Encourages Environment Waikato to collaborate with Environment Bay of Plenty given that Rotorua District Council is split between the two regional boundaries. Please to not that only minor changes to the geothermal section are being proposed.

#### **Solid Energy New Zealand Ltd**

1. RPS should acknowledge the significant role that energy resources, including coal, currently play in the region and national economy, and support the development of clean coal technologies and new low emission extraction techniques.

#### **The Councils<sup>3</sup>**

1. Seeks an inclusive process that allows TA's the ability to participate fully in policy-making with a view to seeking ongoing consensus on objectives, policies and methods as the process unfolds.
2. Recommends that the RPS team invites all territorial authorities to indicate the themes or issues of interest and the level of involvement sought. Those councils who want full involvement should be involved with Environment Waikato staff in developing relevant policy.
3. Concerned that the RPS review is being unnecessarily rushed to the extent that the territorial authorities are deprived from having adequate opportunity to participate fully in the process. States that there is no reason to fast-track the RPS review process to meet legislative requirements or due to a critical need to inform district plan-making.
4. Request that the RPS process be slowed down to allow key stakeholders to fully participate in the process.
5. Concerned that there is an inference in the discussion document that stakeholders should provide information regarding the costs and benefits of methods and the effects of the various options. Cost-benefit assessments are the responsibility of the regional council. The Councils want the opportunity to provide input into the s32 RMA evaluation.

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<sup>3</sup> The Councils is the name given to the joint submission made by Hauraki, Matamata-Piako and South Waikato District Councils.

6. Seeks linkage with the regional community outcomes clarified and indicate the extent to which it is informed by the outcomes that the community seeks, and also how the LTCCP will assist in delivering on RPS objectives.
7. Considers 'Climate Change' should be included in 'Community Wellbeing' and 'Energy' should include 'Geothermal Power'. 'Geothermal Power' is also currently misplaced under 'Community Wellbeing'.
8. Considers that contamination of soils due to agricultural processes is a soils issue, not a contaminated land issue and wants this moved to the 'Soils' section.
9. The RPS shouldn't treat the whole region as the same or advocate a 'one solution fits all' approach.
10. The RPS review needs to make better use of the monitoring data that Environment Waikato has available and use it to focus on amending parts of the operative RPS that are underperforming.
11. The RPS should consider non-interventionist methods as the first option and regulation must be considered only where it can be shown that non-regulatory methods have failed to produce the desired outcomes.
12. Doesn't want Environment Waikato to diminish the local decision-making responsibilities of the district councils. In determining policy and the appropriate methods of implementation, the Councils want the RPS review to consider the full range of options rather than just the centralisation of control.
13. The RPS must give due consideration to the impact of proposed objectives, policies and methods on the primary production sector. Cautions against the RPS taking an interventionist approach as there would be a considerable impact on the ability of individual district councils to make local decisions to suit local communities.
14. Concerned that if Environment Waikato takes on all responsibilities such as landscape, heritage and urban development then it will require additional investment in specialist staff and projects at an additional cost to ratepayers.
15. Doesn't see that Environment Waikato has a role in areas where the districts already have expertise. The RPS needs to recognise the functions traditionally undertaken by TAs and support these by locking in agreed criteria and providing direction through the policy role.

#### **Thames-Coromandel District Council**

1. Notes role of inter-agency Coromandel Blueprint project as enabling integrated land and water management of the Peninsula, as well as the management of future development. Purpose of Blueprint was in part to inform development of the RPS and District Plan and promote consistency between local and regional statutory plans and work programmes.
2. Seeks confirmation that the RPS will identify Blueprint as a source of local issues and considerations to inform s32 supporting documentation, and give effect to the Blueprint as far as is appropriate within a regional context and within the scope of Environment Waikato's responsibilities.
3. Seeks the relevant outcomes and strategies sought within the Blueprint strategies be embedded in the RPS (rather than referred to as separate documents).
4. Important the RPS clearly defines the respective roles of Environment Waikato and local councils, particularly to avoid duplication. It is Environment Waikato's role to provide regionally consistent technical information to territorial authorities to help them find local solutions to regional issues. Alternatively, would like some assurance that sufficient notice will be given where TAs are expected to undertake technical work in order to give effect to the RPS.
5. RPS should limit the involvement of Environment Waikato in land use planning to the minimum extent necessary to support territorial authorities in addressing the significant regional issues that have been identified.
6. RPS should support the ability of territorial authorities to make local decisions to suit local communities in addressing resource management issues. Views one of the core roles of Environment Waikato being the provision of science-based technical information that is regionally consistent – must retain a core of specialist technical expertise as it is impractical and cost prohibitive for territorial authorities to retain this type of resource.

7. RPS should not introduce additional responsibilities for Environment Waikato unless they can be demonstrated to add value. RPS should recognise the functions currently being undertaken by territorial authorities and support these through appropriate objectives and policies. Important the RPS clearly states timeframes for the implementation of identified policy development work with appropriate measures of progress – may also need to be replicated in relevant regional plans.
8. Concerned the current RPS has not delivered acceptable results in a number of areas that were identified as being important e.g. technical work related to coastal development setback lines, significant natural areas and high value soils (work has only progressed on these within TCD due to local contribution of funds).
9. Policy directions need to be clear and consistent – could be helped by limiting policy to addressing only the regionally significant issues. There would be benefit in providing policy direction on building sustainable communities, adaptation to climate change, sustainable energy use, developing regionally consistent natural hazard risk mitigation strategies and the provision of linear infrastructure.
10. Significant resource management issues identified for TCD relate to natural character, landscape, significant natural areas, historic heritage, minerals and mining, and land use.
11. The RPS needs to clearly define what it believes are the functional and practical regional/territorial roles and responsibilities. The region is not homogenous - one size will not fit all.

#### **Waikato-Tainui Te Kauhanganui Incorporated**

1. Ensure the RPS aspires to achieve the overarching purpose of the Waikato River Settlement; wish to be decision makers in this process; and support the submissions of its Management Committees, Hapuu and Marae.
2. Committed to working with Environment Waikato to best determine how the Vision and Strategy should be reflected in the RPS (will be a national policy statement and, therefore, councils will be required to give effect to).
3. Recommends the Vision for the Waikato River be appropriately included within the RPS. Seeks to work with Environment Waikato and other Waikato River Iwi to best determine the incorporation of the Objectives into the RPS.
4. Identifies 12 strategies to be implemented through the RPS (how to be determined again working with Environment Waikato and other Waikato River Iwi).
5. Ensure that the RPS upholds the shared commitment from Waikato-Tainui and the Crown to enter into a new era of co-management and achieves the protection of the integrity of the Waikato River Settlement and its outcomes.

#### **WEL Networks**

1. Ensure appropriate regional policy is provided to guide the efficient integration and development of infrastructure and land use within the Region, and providing for renewable energy and improved energy efficiency.
2. The operative RPS has a narrow focus in relation to strategic transport infrastructure. WEL Networks recognises that Environment Waikato now has the legislative responsibility to promote the strategic integration of land use and infrastructure, and considers this provides an opportunity for the region to promote good practise in this area.

#### **Waitomo District Council**

1. Proposed format of the RPS seems logical. Most of the principles that have been identified to guide the development of the RPS are supported.
2. Concerned at timing of the review.

# 1 Biodiversity

## **ACRE**

1. Environment Waikato should take on land use controls for the purpose of protecting indigenous biodiversity - All remaining remnants are significant.
2. Landowners should be actively encouraged to protect remaining forest and a regulatory approach should be considered for significant areas on private land.
3. Protecting biodiversity is essential to halting water quality decline.
4. Fencing of waterways and wetlands should be mandatory.

## **Ballance Agri-Nutrients Limited**

1. Agree fragmentation of habitat places significant risk on the maintenance of long-term biodiversity.
2. Recognise that areas of significance must first be identified with a view to evaluating the present and future threats and establishment of targets for protection.
3. Environment Waikato needs to take a lead role in providing good ecological information that enables land users to make sound land management decisions.

## **Carter Holt Harvey**

1. RPS should specify that the cost of protection of the public interest in biodiversity on private land is a public cost.
2. Request better definition for the goal of maintaining biodiversity by reference to a specific measure or standard – suggest the NZ Forest Accord could be considered.
3. Primary key threat to maintenance of biodiversity be identified as the progressive destruction by plant and animal pests; and that the value to both public and private interests that arises from the reasonable availability and practicality of use of hazardous substances be specifically referenced.

## **Contact Energy Limited**

1. Concerned that any development proposal requires an assessment against the criteria in Appendix 3 of the RPS which can result in a significant level of uncertainty and cost to the applicant. Such blanket approaches are not always appropriate and more thought needs to be given to assessment tools which are easier to use and less costly to implement.

## **Edens, S (individual)**

1. District councils need to do more to allow for conservation and preservation.
2. Wants Department of Conservation's role acknowledged in the Coromandel in terms of the preservation and conservation work they do.

## **Forest & Bird**

1. Concerned at proposed funding cuts for biodiversity protection projects, including Clean Streams, as well as biosecurity.
2. Importance of catchment approach. Opportunity for "Green New Deal" where investment to rescue economy is directed into green projects (e.g. clean technologies, renewables).

## **Hamilton City Council**

1. Supports the RPS setting targets for protecting ecosystem types across the region.
2. Requests that specific sites, species and habitats be identified in order to enable council to ensure such areas are protected through district plans.
3. Supports the protection of migration corridors for flora and fauna.
4. Requests that Environment Waikato conduct consultation in order to establish appropriate methods to protect, maintain and enhance biodiversity.
5. Requests that the RPS provide clear direction on pest management.
6. Supports the continuation of Environment Waikato taking a lead role in collecting and providing ecological information from across the region.

### **Johns, W (individual)**

1. Setting specific targets for protecting habitat types as this is an unrealistic goal.
2. RPS could assist landowners in producing management plans.
3. RPS should deal with the effects of other activities on biodiversity by identifying land drainage or nutrient inputs and how they impact on ground and river water flows and regulate for acceptable regional levels to safeguard biodiversity.
4. Environment Waikato should take a lead role in providing ecological information and implementing land use controls for the purpose of protecting indigenous biodiversity.

### **National Wetland Trust of New Zealand**

1. Seeks reference to the proposed National Environmental Standard on Ecological Flows and the National Priority Statement on Biodiversity.
2. Wants the RPS to include a full range of images (pictures) of biodiversity in order to show the breadth of topic.
3. Supports the development of more specific, measurable objectives for biodiversity but they should be treated as minimum standards.
4. Supports setting 'bottom lines' such as no regional extinctions, return of lost biota to the region and minimum habitat extent and connectivity.
5. Wants Environment Waikato to take a lead role nationally in developing policy to encourage reversion of unproductive farmland on peat soils into wetland carbon sinks.
6. Wants economic incentives to be developed to help in bringing wetland recreation into the carbon trading market and believes that the Waikato region has vast areas of peatland suitable for reversion to wetlands.
7. Supports the use of land acquisition to address habitat migration as a result of climate change. Environment Waikato should be guided by the national priorities for biodiversity on private land.
8. Supports stronger controls that are supported by generous incentives for voluntary protection and restoration for less depleted ecosystem types and habitats.
9. Highest priority sites should be considered for purchase for reserves using Environment Waikato's Natural Heritage Fund in partnership with other key stakeholders. The aim should be to balance the over-representation of steep-land forest in reserves with the under-represented lowland swamp forests and freshwater wetlands.
10. Supports regulation being used to protect natural areas from inappropriate deliberate destruction and non-regulatory tools to protect them from pervasive problems such as pests and non-point source discharges.
11. Supports the RPS to use both regulatory and non-regulatory tools to manage the effects of adjacent land and protect extensions of natural areas beyond the reserve boundary. Concerned about the effect of pine plantations in dune lake catchments drawing water from the lakes.
12. Wants Environment Waikato to do more to minimise pest re-invasion around reserves.
13. Supports Environment Waikato taking a more proactive role in assisting with connectivity between natural areas on public land through non-regulatory tools. It is critical to tie vegetation clearance of small areas to a spatial and temporal entity so that rules are clearly defined to avoid incremental clearance.
14. Suggests an activity-based approach rather than effects based.
15. Supports current approach in the WRP of requiring consent for drainage of any wetland that meets the criteria for significance.
16. Is critical to acknowledge that biodiversity protection involves a wide range of issues, and that just about every activity that Environment Waikato has a management responsibility for has an impact on biodiversity.
17. Environment Waikato should take a lead role in providing good ecological information and there is efficiency in having the regional council take a leadership role in collecting, assessing, and reporting on consistent, robust environmental information, rather than having many authorities developing parallel methodology.

18. Monitoring of wetlands should be increased, including biodiversity values and community restoration projects, and the evaluation of their contribution towards regional goals. This would help evaluate the true value of contributing regional funds towards community projects.
19. Environment Waikato should take on the function of land use controls for the purpose of protecting indigenous biodiversity.
20. Recognise that some territorial authorities also have ecological expertise, however many in the Waikato have no in-house ecological support. By centralising land use controls for biodiversity, we hope to see stronger protection of indigenous biodiversity from inappropriate use and development.
21. Territorial authorities have the often conflicting role of local development and environmental protection, and given the poor tools we have for valuing biodiversity, the quantitative economic values, and the potential for increased rate take, too often take precedence.
22. Territorial authorities should not be excluded from local scale protection of biodiversity however, and should retain management for issues important to their local community, including amenity value. They also have powerful tools for reserve acquisition via subdivision incentives.
23. Provide direction regarding the use of subdivision tools to secure significant areas in covenants or reserves, with particular consideration given to transferable development rights that direct intensive development away from sensitive natural areas. This tool also provides opportunities for protection of intact of Maori land, while allowing additional lot development on freehold land further from sensitive areas.

#### **Newmont Waihi Gold**

1. Supports Environment Waikato taking the lead role by providing districts with ecological context to ensure a regionally consistent approach.

#### **New Zealand Fertiliser Manufacturers' Research Association**

1. Supports the general themes of monitoring and protecting biodiversity through collection of information and application of best management practices.

#### **New Zealand Forest Managers Ltd**

1. Environment Waikato should establish a process and measures for the identification of representative habitats prior to protection of these habitats. The current process of identifying representative habitats is highly subjective.
2. Environment Waikato should not advocate for the identification and protection of representative habitats at a level greater than the requirements of the RMA.
3. If targets to protect habitat types are to be set, then these should be focused on maintaining representative ecosystem types within the region, rather than ensuring that a certain proportion of local environments are in indigenous cover. Setting a target solely based on the proportion of indigenous covers negates vegetation type and would be an inequitable approach.
4. Protected habitats should have clearly identified 'values' that warrant their protection. If these values change over time, for example through normal ecological succession, this should be recognised and provided for within the RPS.
5. Ensure that it is the significant 'value' of a habitat that is protected, rather than the area of land surrounding the 'value'.
6. RPS needs to be flexible enough to incorporate the dynamic nature of protected habitats within the region.
7. Supports incentivising for the maintenance of biodiversity on private land.
8. Cautions the use of regulation to protect biodiversity as it runs the risk of perverse outcomes as landowners may choose to remove the areas to ensure they are not captured by the regulation.
9. Environment Waikato should not contribute financially to operations on public conservation land or on any crown land.

10. Ratepayers within the region must not be expected to mitigate the deficiency in funding of the conservation estate or any crown agency by providing financial support.
11. Supports the use of market based instruments (such as development rights or biodiversity credits) to address cumulative effects of 'small' permitted clearances.
12. Private landowners should be responsible for maintaining indigenous biodiversity on their land without undue regulation imposed by Environment Waikato. However, if there is a specific want from the community to protect indigenous biodiversity then this should be funded by the community.
13. Supports Environment Waikato being a coordinator of ecological research and information that has been undertaken by other agencies.
14. Does not support Environment Waikato taking on the function of land use control to protect indigenous biodiversity.

#### **Rotorua District Council**

1. Concerned that there has not been any temporal quantification in regards to the decline in the number of indigenous species due to modification and development.
2. RPS should be proactive to reclaiming, enhancing, connecting, expanding and managing areas of significant indigenous biodiversity.
3. Priority needs to be given to those areas containing threatened species in the highest threat category and to ecological islands that are fragile or threatened or essential to threatened species.
4. Supports the use of a range of policy tools to prevent further degradation of biodiversity through development.
5. Supports specific targets for biodiversity but the tools must be strong. The targets should be bottom lines and not inadvertently give the signal that once a target has been reached no further measures are required.

#### **The Councils**

1. Retain the criteria for the identification of significant indigenous biodiversity.
2. Supports monitoring and protection of biodiversity through information collection and application on best management practices.
3. Notes that if protection is required by Environment Waikato on private land, owners should be compensated and if the regional council requires esplanades to be taken, then the cost should not fall on territorial authorities.
4. Do not support putting effort into trying to recover or enhance indigenous biodiversity which has already suffered irreversible damage, rather, efforts should be targeted on maintaining existing indigenous biodiversity into the future. There needs to be a clear focus on margin protection and wetlands.
5. Environment Waikato should focus its investment on pest control to support indigenous biodiversity.
6. Does not support EW to take on land use controls for the purpose of protecting indigenous biodiversity. Wants local councils to be able to identify what is locally significant and protect that.
7. RPS provisions must not impact on the ability to undertake farm conversions to enable the 'best land use' or to intensify farming.
8. Do not support setting new specific targets for protecting habitat types due to the large variations in modifications that have already occurred across the region.
9. Supports significant natural features being identified at a regional level and the provision of the same level of support to each of the district councils.
10. Wants clarification of the use of the term 'local environments' and 'ecological environments'.
11. Supports the use of the regulatory approach as a last resort only. The only viable way of maintaining future biodiversity is through having informed and committed landowners.
12. Supports incentives such as funding for fencing, riparian planting and stream care being provided by Environment Waikato. Wants economic considerations to be taken into account when developing methods for protecting biodiversity.
13. Notes that the Waikato-Tainui settlement may require more biodiversity action.

### **Ngati Tuwharetoa Maori Trust Board**

1. Supports targets which encourage *in situ* conservation of species and revitalisation of important local habitats.
2. Not supportive of costly policy instruments seeking to translocate or reconstitute systems and species where such translocations may spread risks already posed to native species.
3. Support the identification of truly unique ecosystems and species which are primarily or secondarily endemic, or particular to the Waikato region.
4. Suggest a prioritising system of local and regional speciality and endemism for ecosystems and species is preferable to blanket targets.
5. Reluctant to support policy instruments which accommodate and legitimise premature forecasting of phenomena such as habitat migration or climate-induced diffusion and fragmentation until Environment Waikato can show unequivocally that such is occurring.
6. Supports a rigorous exploration of ways to endorse and encourage support for private land-based protection of biodiversity. Advocate a reserved, highly specific Significant Natural Area system for the RPS which takes true ecological characters into account over ideological ones of aesthetic or natural character value (aim being to minimise conflict with landowners while agreeing sets of values with them).
7. Incentivising private land-based biodiversity protection is much under-rated and would support this for Maori landowners.
8. RPS should take a more permissive and progressive approach to supporting biodiversity on public lands (than agencies such as Department of Conservation have in the past).
9. Environment Waikato should have good inventories of its public biodiversity assets before making policy about them.
10. Policy should allow maximum public involvement with public land biodiversity protection and maximum public enjoyment.
11. Will not support ring-fencing ideology. Support the adoption of policies and methods in the RPS which promote activity-based thresholds in the WRP for permitted, discretionary or restricted discretionary levels of clearance activity on private lands.
12. Policies and methods in the RPS need to specifically designate levels of impact on biodiversity as well as geospatial and physical thresholds of effect on land which can be enacted through WRP by introducing region-wide rules with corresponding activity classes.
13. Support an approach in respect of other activities which compels landowners to control behaviours which impinge on biodiversity values where they have agreed to protect them, while assisting them to implement safe, affordable changes at the same time.
14. Environment Waikato should not take on the role of lead agency in the region for purveying ecological information – at most could support ecological extension projects, provide advice on restorative project planning, wetland maintenance etc.
15. Would not support regional rates and other levies being poured into provision of a full, species-oriented scientific service.

### **New Zealand Transport Agency**

1. Biodiversity is considered primarily in respect of State highway function. Specially, where landscaping is required as a result of State highway activities, NZTA seeks to ensure biodiversity principles are taken into account and that biodiversity is maintained and enhanced.
2. Supports the consideration of biodiversity in transport activities carried out by other Approved Organisations (TAs and regional councils) that are eligible for financial assistance from the National Land Transport Fund.

### **Whangamata HarbourCare**

1. Notes that access to Whangamata Harbour in the bays and beaches is now being blanked out by mangroves. Mangroves should be eliminated around the streams which enter the harbour.
2. Wants simple methods proposed in the RPS to allow mangroves to be removed as a right but under supervision and conditions.

### **Department of Conservation**

1. Supports strengthening of biodiversity provisions, including more targeted objectives for a range of ecosystems.
2. Advocates for further protection of natural heritage and biodiversity by introducing minimum percentage clearance rules for representative ecosystem types. Supports the continuation of the NHF as a mechanism to encourage voluntary protection of biodiversity on private land – note that with proposed cut to funding in LTCCP, the introduction of regulatory measures will assist in providing further protection (rates rebate another option).
3. Make provision for the protection of habitat migration and in particular those species which are marginally under threat, to ensure that they do not become endangered in the future. Requirement for setbacks from coastal margins would allow habitat migration to occur in response to climate change.
4. It is appropriate that pest management issues should be addressed as part of the biodiversity section of the RPS.
5. The provision of environmental information by Environment Waikato is supported.

### **Environment Waikato (coastal ecologist)**

1. Biodiversity section seems to focus strongly on terrestrial systems and it would be good to have more mention of estuarine/marine systems. Criteria in Appendix 3 of current RPS are not appropriate for marine systems.
2. Can't often restore coastal systems therefore must focus on preventing impacts – the risk of not applying a precautionary approach are potentially huge and irreversible.

### **Federated Farmers of New Zealand**

1. RPS should address biodiversity protection on public land by requiring the Crown adheres to the RPMS.
2. Biodiversity on private land should be addressed by providing incentives rather than regulation to encourage landowners to positively contribute to a public good.

### **Fonterra Co-operative Group Limited**

1. Supports using incentives to improve protection of significant areas (Clean Streams identified as excellent example). Such programmes are more likely to achieve higher rates of protection over a shorter period of time than setting specific targets for protection of habitat types.
2. Suggests that effects of other activities on biodiversity (e.g. nutrient inputs or land drainage) should be assessed on a case-by-case basis given that impacts will be very different given variables such as soil type, slope and mitigating factors.
3. Supports Environment Waikato taking a lead role in providing good ecological information.

### **Genesis Energy**

1. Should not unnecessarily restrict the potential for a variety of uses of land.
2. Should recognise the important role mitigation can play in sustainable management; and should allow for effects of activities on biodiversity values to be addressed on a case-by-case basis.
3. When considering allocating responsibility for the maintenance of biodiversity, consideration should be given to the already extensive management undertaken by such agencies as Department of Conservation and territorial authorities.
4. Unnecessary duplication should be avoided.

### **Hamilton City Council**

1. Supports setting targets in the RPS for protecting ecosystem types, with specific direction on specified

### **Mighty River Power**

1. Should focus on:
  - Setting criteria for the identification of significant areas of indigenous vegetation and habitats;
  - Requiring territorial authorities to utilise the RPS criteria identify these areas; and
  - Providing appropriate management and protection of such areas including guidance on what development would be inappropriate within areas of containing significant habitats.
2. Environment Waikato should not take on the function of land use control nor should it become involved in the setting of specific targets for protecting habitat types.
3. In relation to the criteria within Appendix 3 of the current RPS.
4. Remains concerned about their all encompassing nature, as these criteria should focus on matters which are of importance to the region's biodiversity.
5. RPS should take a 'no net loss' approach to the management of biodiversity. The important point, and a focus of for the RPS, should be that overall biodiversity is maintained and that, within overall biodiversity, specific significant habitat types are not lost. Such an approach should explicitly provide for biodiversity 'offsets'. A 'no net loss' approach is more appropriate to the purpose of the RMA than a blanket, 'no less' approach.

### **Te Kotuku Whenua & Tainui Hapu**

1. Prefer regulatory (vs non-regulatory) means are used to halt decline in biodiversity.
2. Support targeted objectives covering a range of ecosystems, habitats and species, including wetlands, rivers, lakes and the coastal environment provided adequate information on the areas is applied to all districts.
3. Support Environment Waikato taking a lead role in the provision of such information.
4. Do not support the creation of significant areas and management tools for mainland island protection over and above active protection of all areas.
5. Concerned Environment Waikato doing away with the incentives afforded to private landowners to protect biodiversity and pest management.

### **Tatua**

1. Supports environmental enhancement where this results in benefits to indigenous flora and fauna.
2. The rate of progress must be aligned with the availability of technologies to achieve desired outcomes at a sustainable cost.

### **Taupo District Council**

1. Supports criteria set out in Appendix 3; Operative RPS for determining significant indigenous vegetation and habitats of indigenous fauna. These criteria are currently proposed in the Taupo District Plan so to be consistent with the WRP.
2. Considers the priority of maintenance of biodiversity on private land should be given to significant areas.
3. Non-regulatory approaches need to be met with appropriate incentives to private landowners to encourage protection, maintenance, and or enhancement of these areas.
4. Notes it is more appropriate to identify, maintain, and monitor significant indigenous biodiversity at a regional level rather than district level, given that regions are defined on water catchment areas, and by nature these share similar ecological characteristics throughout the region.
5. Considers that Environment Waikato should take on the function of land use controls for the purpose of protecting indigenous biodiversity. It is further considered that this will increase the certainty to the landowner as to who is the

consent authority in such matters. Currently the Regional Council has landuse rules that relate to biodiversity in respect to wetland and geothermal vegetation clearance which is facilitated by in-house expertise. District Councils do not generally have staff that focus on such values and often have to source external consultants to provide guidance on such matters. Therefore sole management of landuse in Significant Natural Areas by the Regional Council would be more efficient and effective in the long term.

6. In addition to restoring and enhancing biodiversity values within urban areas, it should be a focus of land use at a District level, which could be implemented by District Councils having a biodiversity strategy to enhance local and urban biodiversity values, and where possible link into existing significant biodiversity areas. This could help District Council's focus more efficiently on ways to increase biodiversity through new and upgrade of existing development areas, and regional councils to focus more efficiently on protecting and maintaining existing significant biodiversity areas.

#### **Trustpower Limited and King Country Energy Limited**

1. Maintenance of biodiversity should not be at the detriment of existing lawfully established activities, including their operation, repair, maintenance and reasonable development.
2. Protection or enhancement of biodiversity on private property should only be undertaken with the agreement of the affected property owners and occupiers and should be voluntary (except areas of significant indigenous vegetation and significant habitats of indigenous fauna).
3. Priority should be given to areas with "significant" values. RPS should support the protection of biodiversity more generally through non-regulatory measures.
4. Regulatory measures should only be used to protect areas of significant indigenous vegetation and significant habitats of indigenous fauna from inappropriate subdivision, use and development.
5. Environment Waikato should take a lead role in providing good ecological information, however, the function of land use controls should reside with territorial authorities.

#### **Waikato-Tainui Te Kauhanganui Incorporated**

1. Important that policies address surrounding land use effects on biodiversity, promotes biodiversity protection and provides strong regulatory mechanisms to enforce these and deal with non-compliance.
2. Must recognise the link between Pest management and management of biodiversity – needs to be reflected in the RPS.
3. Environment Waikato should take a lead role in partnership with other regulatory agencies to promote and protect biodiversity values – Tangata Whenua could assist in the monitoring of local biodiversity.

#### **Waitomo District Council**

1. Concerned that the regionally consistent approach suggested will not acknowledge the vastly differing ecological environments throughout the region – the approach will have to be fit for purpose and cannot be based on a one size fits all philosophy.
2. Notes that a regional council may not include a provision in its regional policy statement requiring territorial authorities to monitor or report on the extent to which their policies give effect to regional objectives.
3. Unclear how Environment Waikato proposes to use the RPS to take on responsibility for land use control to promote the maintenance and enhancement of ecosystems in water bodies and coastal water.

#### **Waikato Biodiversity Forum**

1. Climate change needs to be included with provision for wildlife corridors on private land.
2. Consistency is required between district and regional plans.

3. A strong regulatory approach is required as non-regulatory approach is not working.
4. RPS needs to address effects on biodiversity by a combination of regulation and incentives and work with other agencies who can influence the behaviour of polluters.
5. Environment Waikato should take a strong leadership role in biodiversity protection and enhancement, and build strong partnerships with central government, territorial authorities and communities.
6. Responsibilities need to be shared and clearly defined through the RPS.
7. Environment Waikato should provide ecological information in partnership with Department of Conservation and other agencies such as Landcare Research.
8. RPS should highlight the economic value that ecosystem services contribute to the economy.
9. Should provide consistency in biodiversity protection rules between territorial councils.
10. Need to develop indicators for tracking gains in biodiversity protection.
11. RPS should clearly set out controls on land use and should explore implications of Environment Waikato taking on this function.
12. Baseline information important for monitoring. Catchment approach supported.
13. Seek clearer measurable and achievable objectives with reference to the NZ Biodiversity Strategy.
14. RPS should definitely contain a separate biodiversity chapter. RPS needs to provide strong protection for biodiversity as regional plans do not afford enough protection.
15. Questions whether the RPS could include objectives about partnerships with the community, or whether the RPS could address public education to highlight the importance of healthy functioning ecosystems.
16. Environment Waikato must provide resources for enforcement of any regulations and should be accountable regarding the achievement of objectives and responsibilities.
17. Agree that specific targets need to be set for protecting habitat types (along with resources to meet them).
18. Protection of landscape values in relation to biodiversity values is important.
19. Support prioritisation of sites of significance.
20. Focus of objectives should not be only on protection but also on restoration.
21. Objectives must be clearly stated so as to give clear direction.
22. RPS should include objectives that highlight the importance of and link with pest control for biodiversity protection.

### **Waikato District Council**

1. Biodiversity provisions in the RPS need to be strengthened to implement the amendments to the RMA, the NZCPS, the proposed National Policy Statement for Freshwater Management and New Zealand Biodiversity Strategy.
2. WDC considers that landuse controls should remain primarily the responsibility of the district, but supports a lead role for the regional council in providing information and monitoring and other support as necessary.
3. Prevention of further fragmentation of indigenous vegetation (and particularly cumulative effects) and how cleared indigenous vegetation can be rehabilitated should be considered.
4. A spatial plan that seeks to restore the connectedness of fragmented pieces of indigenous vegetation in the region may be of value.
5. Provision of incentives and advice to protect significant areas should be in accordance with the direction outlined in Future Proof.

## 2 Air

### **ACRE**

1. Retain general approach to air quality. Tree planting would improve air quality and should be encouraged.

### **Ballance Agri-Nutrients Limited**

1. Specifically describe contributors to degraded air quality.
2. Must specifically address the effects of domestic solid fuel heating and vehicle emissions as a priority, due to the known adverse effects on public health and the environment.
3. Must specifically address reverse sensitivity issues in a manner that explicitly directs territorial authorities to address the potential for inappropriate subdivision and development.
4. Concerned about Environment Waikato's proposal to withdraw its commitment to achieving the National Environmental Standard (Air Quality) by 2013 (per LTCCP).

### **Carter Holt Harvey**

1. RPS should recognise that air discharges provided for by way of resource consent are adequately regulated and cannot be pre-emptively curtailed without risking significant economic and social loss; and achievement of the National Environmental Standard will be primarily achieved by directing policy and regulation to currently permitted discharges to air including domestic home heating and transport.

### **Hamilton City Council**

1. Requests that the RPS address the issue of inefficient home heating and their direct effect on air quality.
2. Recommends incorporating policies that address inefficient wood burners in order to reduce air pollution.
3. Recommends that the RPS address domestic open air burning and provide guidance to territorial authorities.
4. Supports the use of mitigation tools for managing point source pollution from industry which should be considered by industries that are applying for significant consents to discharge to air.
5. Requests that the RPS provides guidance on considering air quality effects of certain activities (such as the establishment of industry next to community facilities or environmentally sensitive areas).

### **J Swap Contractors Ltd**

1. RPS needs to recognise that the extraction, processing and distribution of aggregates has the potential to generate discharges to air.
2. Wants the RPS to recognise that all quarry sites have rock resource lives that are in excess of 30 years.
3. Wants RPS to require district plans to provide adequate buffer zones around all existing quarries in order to protect the extraction of the aggregate resource.

### **Latitude Planning Services**

1. Comments that air quality seems to be too narrowly focused on PM<sub>10</sub> when there are potential issues such as benzene around areas of high traffic density.

### **Ministry of Education**

1. RPS needs to include provision to ensure that potential adverse nuisance and health effects associated with air discharges do not occur within the vicinity of schools

### **New Zealand Transport Agency**

1. Elevate the issue of vehicle emissions with objectives and policies in the RPS to ensure consistency with the NZTS targets relating to protecting public health.
2. Requests ability to work with Environment Waikato with drafting of policy relating to transport emissions and air quality issues.

### **New Zealand Pork**

1. Does not support the RPS addressing nuisance issues (in particular odour) given that in rural areas, odour is most frequently a localised amenity issue which is exacerbated by poor land-use planning. Is most effectively managed as a district council responsibility. In the longer-term, the direction of change signalled by the Future Proof urban growth strategy should serve to progressively reduce tensions around incompatible landuse in rural zones.

### **Poultry Industry Association of New Zealand and the Egg Producers Federation of New Zealand**

1. Supports consistency with the National Environmental Standard on Air Quality and the new emphasis on vehicles and domestic heating as sources of adverse air quality.
2. Supports approach in RPS around issues of reverse sensitivity in order to give strong guidance to district councils indicating that reverse sensitivity is an important issue. Is particularly important that district councils receive guidance as to how reverse sensitivity effects will be managed as the location of sensitive uses adjacent to existing rural production activities is an important issue for the industry.
3. Supports buffer distance approach to avoid adverse odour and amenity effects for air quality. However, there needs to be a strong emphasis that reciprocal setback distances are required at a district level for new activities that could potentially generate adverse effects and sensitive uses locating near established uses.
4. Urges RPS to be clear about how odour is managed between regional and district councils as this often causes confusion for councils and an unnecessary overlap of controls.
5. Suggests that regional council deals primarily with odour as an air discharge, while district councils should focus on protecting amenity.
6. The nuisance effects of odour should be dealt with at a district council level.

### **Rotorua District Council**

1. RPS should have a consistent approach to dealing with the amenity effects of air quality. Supports buffer areas for existing uses especially for industry.
2. Recognises that transport air quality is a difficult area to manage with any significant success.
3. Does not support higher levels of air quality than is required in the National Environmental Standard. Measures to address air quality arising from home heating need to be balanced and standards for air quality relating to this issue should not exceed those specified in the National Environmental Standard.

### **Department of Corrections**

1. RPS needs to include provisions that ensure that potential adverse nuisance and health effects associated with air discharges do not occur within the vicinity of the Department's facilities.

### **EECA (Energy Efficiency and Conservation Authority)**

1. Suggest that reference is also made to the role of bioenergy from wood (woody biomass) as a clean and renewable energy source, which when combined with modern burning technologies can reduce fine particulate matter compared with non-renewable fuels.
2. Supports objectives and policies in the RPS to address air quality concerns and highlight the role of renewable energy as 'cleaner'. RPS could usefully encourage the uptake of bioenergy. RPS should have regard to additional benefits of renewable energy generation such as the economic benefits for the region in

supporting biomass fuel – include reduced wood wastes to landfill, reduced importation of energy and added value to forestry and wood processing sectors through better use of woody by-products.

#### **Federated Farmers of New Zealand**

1. Does not support use of buffer zones when existing legitimate activities are impacting on new sensitive activities.
2. Supports recognition of odour and reverse sensitivity issues – could be more explicit mention made of the potential negative effects and restrictions reverse sensitivity issues can have on existing farming activities.

#### **Fonterra Co-operative Group Limited**

1. Appropriate for the RPS to address reverse sensitivity issues. Seeks to ensure that the dairy industry is not inappropriately singled out and inequitably constrained or compromised by reverse sensitivity issues.
2. Supports the current National Environmental Standard and Ministry for the Environment Ambient Air Quality Guidelines but does not support more stringent requirements being applied by Environment Waikato.
3. Supports a focus on reduction of fine particulate levels caused by home heating. Requests the burden to reduce PM<sub>10</sub> emissions is spread equitably with the focus being on those airsheds which are currently non-compliant.

#### **Genesis Energy**

1. Provisions should enable a range of activities to use air in order to recognise the positive benefits to people and communities arising from activities that affect air quality; and should be consistent with the nationally consistent approach provided for by the National Environmental Standard.

#### **New Zealand Forest Managers Ltd**

1. Supports mitigation as a tool to minimise the impact of activities on local air quality.

#### **New Zealand Police**

1. RPS needs to ensure that potential adverse nuisance and health effects associated with air discharges do not occur within the vicinity of the New Zealand Police facilities.

#### **Solid Energy New Zealand Ltd**

1. Does not support pursuing strategy outlined in current LTCCP of withdrawing commitment to achieving compliance with the National Environmental Standard by 2013. This would be detrimental to the region in the medium and longer term. If Environment Waikato withdraws its commitment it will place considerable uncertainty and risk on industries within potentially non-complying air sheds.
2. Consider it is essential that existing industries and other organisations in the region that currently rely on wood or coal boilers for their energy requirements have a degree of certainty that they can apply for renewal of consents.
3. Environment Waikato should address the elevated PM<sub>10</sub> issues that exist in some air sheds with the aim of meeting the National Environmental Standard by 2013. Desirable that PM<sub>10</sub> discharges due to small home woodburners is dealt with over a relatively short period to effectively deal with the health issues and provide greater certainty for industry to operate and invest.
4. Considers it is not appropriate to penalise industry when the problem of elevated PM<sub>10</sub> is known to be caused by residential emissions.
5. Environment Waikato has an obligation to ensure that the National Environmental Standard can be achieved by 2013.
6. Supports the efficient use of coal and other non-renewable energy sources used in a sustainable manner that result in improved energy efficiency for industry.
7. Seeks that Environment Waikato: introduce policies that will achieve compliance with the National Environmental Standard by 2013; promote the benefits of replacing older solid fuel burners with alternative heating systems where these can

comply with the National Environmental Standard; provide for reverse sensitivity issues and the need for land use planning that considers the air quality effects of allowing certain activities in close proximity.

### **The Councils**

1. Wants national and regional support to be provided to counter the health issues in problematic airsheds to ensure that economic development won't be stymied.
2. The RPS and WRP needs to clarify standards for air discharge so that developers and district councils are aware of when regional consents are required.
3. The RPS should give guidance to district councils (including guidance on odour assessment).
4. RPS should clarify Environment Waikato and territorial authority functions to avoid the current overlap of responsibilities.
5. The Councils don't support the use of stricter PM<sub>10</sub> targets than those in the National Environmental Standard as this is contrary to common law.
6. Supports monitoring all airsheds while taking into account meteorological conditions and economic realities and aspirations.
7. Wants district councils to retain responsibility for amenity or nuisance issues.
8. Supports the use of buffer distances in providing non-regulatory advice.

### **Taupo District Council**

1. Notes the airshed around Taupo town does not currently meet the requirements of the National Environmental Standard at times over winter. This is of concern to the Council and community, particularly given the potential implications with regard to the issuing of air discharge consents in the future.
2. Notes with caution future moves to regulate discharges, particularly from private residences in the form of home heating appliances. While TDC agrees that some regulation may be required to encourage a move toward complying heating appliance - concerned that a generic application of regulation may well have significant social and economic effects.
3. Suggest that any moves to utilise regulation as a tool also needs to be counter balanced by use of incentives such as the scheme successfully used in Tokoroa.
4. The RPS should not seek to impose air quality standards in excess of those identified in the National Environmental Standard.

### **Te Kotuku Whenua & Tainui Hapu**

1. Do not support retaining the broad approach to air quality.
2. Targeted approach (inclusive of odour) is preferable along with identification of non-complying airsheds with a focus on aligning them to reduce the pollutants systematically.

### **Trustpower Limited and King Country Energy Limited**

1. Consider that separate provisions should be implemented for temporary and permanent discharges and that the provisions associated with temporary discharges should be less restrictive.

### **Waikato-Tainui Te Kauhanganui Incorporated**

1. Air management important due to the direct link between PM<sub>10</sub> and asthma.
2. Important that the RPS set stricter targets for PM<sub>10</sub> providing a focus on non-complying airsheds and at least maintaining a good standard for complying airsheds.

### **Waitomo District Council**

1. Realities of energy situation need to be taken into account in this chapter (not sufficient supply of non-fossil-fuelled electricity generation capacity). More effective to address local PM<sub>10</sub> situations by promoting and subsidising the installation of suitable insulation and efficient wood burners for home heating.

**Waikato District Council**

1. The discussion document raises as a potential approach expansion upon current regional air quality issues, including amenity issues such as odour, dust and smoke.
2. Many of the issues listed in the discussion document are addressed in the district plans; for example, the Proposed Waikato District Plan addresses separation of incompatible activities through methods such as requiring on-site containment of effects in the first instance, zoning, internal building setbacks and designations. In addition, policy direction around the consideration of optimal location of large sources of pollution (eg heavy industries) in accordance with prevailing wind direction and micro-climate issues when considering new industrial areas and resource consents for industrial activities would be a positive step.
3. Clarification of the respective roles of regional and district councils in the RPS would be of benefit.

# 3 Water

## ACRE

1. Set targets.
2. Modification of intensive agriculture and water use required
3. Provide clear regulation to guide agricultural practices.

## Ballance Agri-Nutrients Limited

1. Classification of all water bodies, relative to their use and characteristics must occur as a priority (given status of water quality as number one environmental concern).
2. Classifications must be established in a manner that includes all social, economic, environmental and cultural values, and have corresponding standards/guidelines – this approach should be consistent with Schedule 3 of the RMA and allow for site-specific or catchment-specific variations.
3. Monitoring is required to measure performance.
4. Recognise uncertainty around co-management of Waikato River.
5. RPS must emphasise the connection between land use management practices and water quality and advocate a strong non-regulatory approach to management, focussing on integrated CMPs for priority areas.
6. Priority areas cannot be determined without first applying classifications, then standards, then measures of quality or quantity against such standards.
7. Support proactive non-regulatory methods for land use management. Inappropriate water allocation has the potential to constrain NZ's economic development – the RPS should make clear how water allocation rights can or should be transferred.
8. If the RPS makes reference to efficiencies (or inefficiencies), “efficiency” needs to be accurately defined.
9. Recommend reference in RPS to the importance of primary and secondary industry to the regional economy and society, and its reliance on the use of freshwater resources.

## Carter Holt Harvey

1. Opposed to suggested approach whereby the RPS could focus on avoiding any further degradation and look to protect the best and enhance the rest.
2. Suggest RPS reflect RMA obligations on resource users to avoid, remedy or mitigate the adverse effects of their activities on the environment.
3. Acknowledge in RPS that “environment” includes social, economic and ecological outcomes.

## DairyNZ

1. Agrees impacts of land use on freshwater is a focus, however, also think it is critical to consider interplay between hydroelectricity and water quality.
2. Important to describe the significant resource management issues in a resource- or ecosystem-focused and effects-based way.
3. Important to recognise the severity and significance of issues will vary across catchments and parts of the region.
4. Would like to see work of Helen Ritchie on defining freshwater issues used in drafting.
5. Would be useful for Environment Waikato to undertake further work to determine at what point need to worry about upward trends in nitrogen in the Upper Waikato and hydro lakes; and the implications of upward trends in nitrogen in the Firth of Thames.
6. Acknowledges that the cumulative impacts of land use are an issue that needs to be focused on in the RPS.
7. In deciding whether to have region-wide vs specific objectives, Environment Waikato needs to be aware that the dairy industry recognises there can be tensions between farm-scale and catchment-scale objectives, even when farms are being

resource efficient; it is much easier to prevent loss of a use value for a water body than to get it back

8. Critical to identify the options for use.
9. Important that objectives are realistic for the people who are going to have to do something to achieve those.
10. If aspirational objectives are set, it will be important to have milestones along the way.
11. Should strategically prioritise areas of focus – useful to do on the basis of high value water bodies already identified in addition to areas where there is a danger of losing something significant and areas that will be important because of the Waikato River Settlement.
12. Focus on socialising good practice in the rest of the region to hold water quality at present levels. Important to build responsiveness into the system to deal with cumulative effects and increases in scope and scale.

#### **Tatua**

1. Set targets at the catchment or sub-catchment level. They must reflect what can reasonable be achieved for that catchment and be informed by the catchment community.

#### **Hamilton City Council**

1. Supports highlighting issues that are associated with non-point sources on water quality.
2. Acknowledges that the majority of significant point sources throughout the region have been dealt with. The RPS should therefore change its focus to addressing issues related to non-point sources.
3. Supports the RPS setting targets for water quality within the region.
4. Questions the use of terms such as 'fishable' and 'swimmable' in being able to quantify and define targets.
5. Requests that RPS outline a process for identifying water bodies that are of local or regional concern and define a process for setting water quality targets. In setting such targets, the entire catchment needs to be taken into account so that complete ecosystems can be considered.
6. Recommends that the RPS address issues associated with the effects of land use on water quality.
7. Consider a range of tools in addressing water quality issues, including: low impact urban design and development; promotion of water re-use; water harvesting; best practice onsite wastewater disposal; centralised wastewater collection, treatment and disposal systems in low-density areas.

#### **J Swap Contractors Ltd**

1. Requests policy to ensure that the additional water quantities required for the growth in demand for quarry products are able to met into the future.

#### **Johns, W (individual)**

1. Requests the Clean Streams programme be continued.
2. Supports the RPS setting targets for water quality. Supports zoning soil types for agricultural production, industrial production, residential, spiritual, or recreational uses.
3. Requests all new or redevelopment of land to be hydrologically neutral from a set date in the next three years.

#### **Latitude Planning Services**

1. Suggests using Schedule 3 of the RMA to determine targets for water quality.

#### **Ministry of Education**

1. Ensure that adequate supply of good quality water is provided for schools within the Waikato region. The Ministry is particular interested in any changes to policy that could affect water takes and the supply to its rural schools.

2. Noted that the Ministry have appealed the Council decisions on WRP Variation 6.

### **Mighty River Power**

1. The Waikato Hydro system is a nationally significant resource and needs to be recognised in the RPS.
2. Supports an approach to freshwater allocation that is consistent with WRP Variation 6.
3. Expects that the RPS will recognise the benefits that derive from the use of water for electricity generation.

### **National Wetland Trust of New Zealand**

1. Wants more prominence given to the Waikato River Settlement and would like to see Environment Waikato grasp the opportunity to work positively with iwi and other community groups.
2. The settlement should be a level for stronger policies around restoring the health and wellbeing of the river and its tributaries and associated wetlands.
3. RPS review should acknowledge that voluntary industry methods have not worked and that regulation will be required to achieve water quality targets.
4. Wants an expansion of the stock exclusion rules.
5. Any increase in regulation should be accompanied with increased proactive non-regulatory approaches.
6. Wants stronger commitments to non-regulatory methods in the RPS that will ensure that funding is made available for such methods in the LTCCP.

### **New Zealand Fertiliser Manufacturers' Research Association**

1. Needs to be recognised that improvements in water quality take time
2. Supports the use of collaborative approaches using non-regulatory methods.
3. Want to see a catchment and sub-catchment approach to managing water resources.

### **New Zealand Forest Managers Ltd**

1. Support specific targets at the catchment level where there are competing demands for the use of water. This should be done on a case by case basis once the effects on water quality of all activities within the catchment have been assessed and fully quantified.
2. Strongly opposes a 'grand parenting' approach for allocation of pollution rights.
3. Market based instruments such as trading of water rights could be used to achieve better water management practices.
4. Education campaigns promoting the protection of waterways from stock and the responsible disposal of effluent could also be used.
5. Better water management practices could be achieved by controlling the intensification of agricultural land use.

### **New Zealand Pork**

1. Re-visit the levels of control applied to point sources. New Zealand Pork has a particular interest in the level of control currently applied to the application of pig manure to land.
2. Recommends clear assessment of the science on land use and water quality to support future policy development and prioritisation.
3. Supports collaborative solutions between industry and local and central government to address sustainable management of water.

### **New Zealand Police**

1. Ensure that an adequate supply of good quality water is provided for New Zealand Police facilities within the Waikato Region.

### **Rotorua District Council**

1. Policies in the RPS need to be in line with the NPS for Freshwater Management for giving priority for municipal water supplies over other users.

2. RPS should place priority on municipal water supplies and enable extraction rates at a volume greater than the low flow where required to sustain communities.
3. Supports a collaborative approach to addressing water management in the RPS. If Environment Waikato is seeking to introduce restrictions on rural land uses in areas outside the Lake Taupo catchment, Council would encourage dialogue.
4. Supports the use of both non-regulatory and regulatory measures to address possible restrictions on rural land uses.
5. Low impact design for stormwater for hydrologically neutral development and rainwater harvesting should be encouraged.
6. Supports furthering knowledge on groundwater resources.

#### **Solid Energy New Zealand Ltd**

1. Supports the intended strategy that achieving a net improvement in water quality will require a focus on non-point source discharges, in particular the diffuse discharges from primary industries.
2. Be careful with setting widespread water quality targets for some elements where the effects are not significant and cumulative effects are either unlikely or proven not to occur.
3. RPS should provide a stronger commitment to integrated management which reflects the links between land use activities and water quality.

#### **Taupo District Council**

1. Policy should reflect the importance of freshwater as an essential part of achieving basic community wellbeing. Without it life is not possible and this fundamental aspect should not be lost in an attempt to balance the use of water by other users for commercial gain.
2. Consider WRP Variation 6 has gone a long way toward achieving an appropriate recognition of the importance of freshwater to communities and should therefore be reflected in the RPS.
3. Encourage the adoption of a philosophy of protecting the high quality freshwater resources like Lake Taupo and enhancing the rest.
4. Support the promotion of more sustainable stormwater management. This is an approach being promoted through strategy development by the TDC and is expected to also be reflected in changes to our Code of Practice for the development of land.

#### **The Councils**

1. Want the RPS to critically analyse the financial impact of further regulation on the farming sector.
2. Recommend using the objectives and principles outlined in the Primary Sector Water Partnership.
3. Water quality targets should take into account economic viability, be based on scientific evidence and should be achievable.
4. See a conflict in creating water quality targets as there is variation in water quality in the different catchments across the region due to soil types and other factors.
5. Believe it is appropriate to delay the RPS review process in order to incorporate the recommendations of the Waikato-Tainui settlement.
6. Supports managing land use effects on water quality through voluntary/non-regulatory methods such as working with industry.

#### **Ngati Tuwharetoa Maori Trust Board**

1. Water quality standards MUST appear in the RPS.
2. Primary tenet should follow proposed NPS – to halt any further degradation of freshwater resources.
3. Standard could be set in a number of ways: qualitative descriptions (drink-ability is the most optimal and the one which Environment Waikato should aim for as much as possible);
4. Quantitative descriptions or classes which prescribe best possible levels of dissolved chemicals, raw elements etc where the optimal targets should be

expressed as the smallest concentrations of such chemicals as is realistic for each; operating minima and maxima measures to be achieved as targets through the RPS; targets should be set ideally at a regional scale, where catchment-wide targets and controls should be a second tier of control.

5. WRP Variation 5 is a catchment-based model which should be adopted elsewhere.
6. RPS could use a range of tools to assist in modification of land-uses, including:
  - Policies and methods which support more controlled (inc prohibited) activities in respect of land uses adjacent to or impinging on waterways;
  - Tools which enforce restricted discretionary activity status on high impact uses of land such as dairying, stock movement, and effluent management;
  - Tools which compel more effective riparian management and employment of setbacks on lands which have historically been heavily farmed;
  - Tools to compel flood protection; policies and methods which better guide on-farm management of necessary but harmful non-point source discharges and which compel compliance;
  - Better methods for point source discharge controls and more room to allow penalties to be used;
  - Better integration of soil and water management rules; clearer co-management objectives, policies and methods.
7. Would support promotion of tools such as low impact stormwater structures, more efficient back flow prevention structures and soft methods such as riparian restoration and land retirement.
8. Support more investment in natural remediation of water pollution, available through the creation of new wetlands, ponds etc and maintenance of existing wetland complexes.
9. Fully endorses the co-management regime for the clean up of the Waikato River – encourage EW to adopt a simple, dialogue-based and outcome oriented approach in its RPS which is centred around aiming for results in water management not simply introducing instruments.

#### **Wairakei Pastoral Ltd**

1. Provide for: a balanced approach to the take and use of freshwater that recognises the need for all economic sectors to have access to freshwater resources; environmental standards regarding environmental flows, and soil quality that are soundly based on empirical scientific data (for e.g. allocable flows from the Waikato River above Karapiro could be fixed at 20% of Q5 without giving rise to any adverse effects on the environment).

#### **Department of Corrections**

1. Include provisions that ensure an adequate supply of good quality water is provided for the Department's facilities within the region.
2. Particularly interested in any changes to policy that could affect water takes and the supply to its rural prisons.
3. Noted that Department has appealed decisions on WRP Variation 6.

#### **Department of Conservation**

1. Essential that land use consents address both adverse effects on water quality as well as methods to improve water quality and in-stream habitat values.
2. Support setting water quality targets – one option is to follow classes referred to in the RMA and apply them at a catchment or sub-catchment level.
3. Give clear direction on integrated management to address the impact of land use on water quality.
4. Encourage water harvesting to make use of stormwater when it is prevalent.
5. Support low impact design for stormwater and other discharges that lead to improvements in water quality.
6. Recommend inclusion of higher protection mechanisms for wetlands via the introduction of regulatory measures for private land owners.

### **ECOplus**

1. Consider including recognition that on-site greater recycling has benefits in reduced water use, reduced wastewater production and reduced energy consumption; greywater has significantly lower nutrient levels than a full wastewater stream – therefore might be appropriate to look at developing greywater specific rules for land application in the region.

### **Environment Bay of Plenty**

1. Place greater emphasis on the interlinked nature of water quality with water quantity, including groundwater.
2. Note distributive justice issues with “protect the best and enhance the rest” approach.
3. Needs to be greater recognition that groundwater boundaries are different to surface water boundaries (Waikato land within Rotorua lakes catchment where nutrient input is a significant issue for the Region).

### **EECA**

1. Recognise the potential for mini, small and medium scale hydroelectricity generation in the region and recognise the benefits to be derived from the use of hydro resources.

### **Federated Farmers of New Zealand**

1. Consider an approach that aims to maintain the existing quality of water bodies will be more achievable than improving water quality.
2. Suggests RPS could focus on priority water bodies selected on their values to the community – prioritising approach ensures that effort and expense is focused where the desired outcomes are achievable and realistic.
3. Remaining waterbodies could be provided for by maintaining their existing quality and promoting good practice in these catchments.
4. Recommend that all land uses are recognised to contribute to water quality decline and included in implementing water quality outcomes; and that education of impacts and effects of activities on water quality and promotion of good practice be included in the RPS as a method of achieving outcomes.

### **Fonterra Co-operative Group Limited**

1. Policy of maintenance and improvement in water quality may be desirable, however, growth and development also desirable.
2. Any reference to water quality targets needs to encompass the following principles:
  - Awareness, accuracy, understanding and measurement of current practice;
  - Application of good science and robust cost benefit analysis;
  - Assessment of the availability of tools, resources;
  - Capability to achieve the objectives, policies and rules which may be set, and
  - Reflection of this assessment when establishing desired timelines.

### **Genesis Energy**

1. Provisions should recognise and provide for the positive benefits to people and communities arising from the use or development of water resources, rivers and lake beds and existing uses of water and the associated lawfully established infrastructure.
2. The principles developed in WRP Variation 6 should be retained and a similar integrated catchment-based approach should be taken.

### **Te Kotuku Whenua & Tainui Hapu**

1. Support use of low impact design techniques in development and for stormwater management. There has to be focus on non-point source discharges.
2. Non-regulatory approaches have not worked and are not supported
3. Regulatory approach is required.
4. Target setting is urgently needed.

### **Trustpower Limited and King Country Energy Limited**

1. Considered inappropriate to adopt measures suggested in proposed NPSs but should consider the Proposed NPS for Renewable Electricity Generation.
2. Water quality provisions should not be more restrictive than the appropriate water quality standards. 'Swimmable' and 'fishable' targets and other such provisions may be subjective and restrictive.
3. Consider that suggested approach of avoiding any further freshwater degradation has merit but requires careful implementation – more appropriate goal would be to ensure that the adverse effects of any activity or discharge of contaminants are avoided, remedied or mitigated so that the resource is not permanently (and significantly) adversely affected.
4. Environmental or minimum flows need to be identified on a case-by-case basis; flow setting should not be restricted to a specific methodology(s).
5. Consider that setting of upper allocation limits or levels is inappropriate.

### **Waikato-Tainui Te Kauhanganui Incorporated**

1. Management and improvement of the Waikato River and its catchments is the top priority.
2. Strengthen regulatory and compliance approach to all users of freshwater.
3. Policy must be stronger.
4. Penalties for non-compliance must be a disincentive.
5. Would like to see stringent targets for water quality in the RPS.

### **Waitomo District Council**

1. Note recent acknowledgement that the large number of water storage dams for hydro generation probably the largest contributor to the decline of water quality in the Waikato River.
2. RPS should look at encouraging environmentally sound agricultural practices whilst also containing measures that can be applied to discourage environmentally unsound practices where necessary and as the exception and not the basis of policy.
3. RPS should also look at mitigating the effects of other users on the rivers and not only the effect of primary producers.
4. Integrated management will deliver more efficient outcomes than concentrating on single issues to the exclusion of other exacerbators.
5. Questions limitations on RPS containing directions about low impact design for stormwater.

# 4 Soil

## **ACRE**

1. Does not support this section – contains no acknowledgement that the current problem with soils is the destruction of the soil biology by overuse of fertilisers and other chemicals and compaction.
2. Remediation by “beyond organics” techniques option to fix nutrients, prevent leaching and produce more nutrient and sugar dense pasture and crops and higher quality meat (and lead to better prices and lower stocking rates).
3. Target for soil quality should be to “restore a healthy and robust soil biology”.

## **Ballance Agri-Nutrients Limited**

1. Recognise inappropriate subdivision has resulted in the loss of some of the most versatile soils and often as a subsequence to intensification, or to farming on less suitable soils.
2. The importance of primary industry to the regional economy must be highlighted.
3. Consider it unreasonable to overly regulate primary production because local government has fallen short in protecting the region’s valuable soil resources. Seeks linkage between land use and water quality.
4. Focus solely on issues affecting the maintenance and protection of soil quality – classification and zoning of all soils a good start.
5. Support proactive non-regulatory methods for land use management.
6. EW’s contaminated land assessment of levels of cadmium and fluorine in soils from phosphate fertilisers to be unwarranted.

## **Carter Holt Harvey**

1. RPS should not focus on avoiding further degradation of soil resource if that could be interpreted as imposing a greater obligation on one landowner as an indirect regulatory subsidy to another.
2. Establish scientific and technical standards by which soil erosion, compaction, excessive fertility etc can be objectively judged – apply those standards in determining the performance of all soil resource use (existing and new).
3. RPS should develop an environmental bottom line for maintenance and enhancement of soil resources applicable to whole region.

## **Edens, S (individual)**

1. Need to restrict subdivision in order to preserve high quality soils and give clear direction to territorial authorities on this issue.

## **Hamilton City Council**

1. Supports the RPS guiding development in order to avoid development in areas with high quality soils.

## **Latitude Planning Services**

1. Concerned about the permissiveness of Waikato District’s approach to allowing subdivision to take place on productive farmland.
2. Cautions that some developers may subdivide rural land before FutureProof is implemented through plan changes.

## **New Zealand Fertiliser Manufacturers’ Research Association**

1. Fully endorses the protection of high quality productive agricultural land from urban subdivision.
2. Considers ‘excess soil fertility’ is a misnomer as it relates to water quality policy rather than soil quality.
3. Gradual accumulation of contaminants should be addressed through close liaison with industry and farmers.

### **New Zealand Forest Managers Ltd**

1. Regulation should be effects-based to effectively address soil quality.
2. Set a target for guidelines on soil quality and these should not be exceeded.
3. Supports forums with industry groups to help to achieve better soil quality outcomes.

### **Poultry Industry Association of New Zealand and the Egg Producers Federation of New Zealand**

1. Concerned that excluding activities that do not rely on the productive capacity of the soil from the rural environment potentially excludes poultry farms and other 'rural' activities that cannot be located anywhere else.
2. Wants poultry farms to be recognised as legitimate rural activities as they are only appropriately located in the rural environment.
3. RPS should contain a definition of 'rural activity' that includes intensive livestock farming to ensure that poultry farms are considered appropriate in the rural environment.

### **New Zealand Pork**

1. Supports collaborative solutions between industry and local and central government to address sustainable management of soil quality.

### **Rotorua District Council**

1. Proposals that ensure that soil based activities are ecologically, socially and economically sustainable are welcomed.
2. Recognise the linkages between soil management and off-site effects such as water quality.
3. Cautions against dealing with soil in isolation.
4. Is interested in research on soil contamination as a by-product of farming practices within the Rotorua District and sees that continued monitoring and information sharing is essential.
5. Encourages Environment Waikato to focus on assisting the provision of information to landusers and key stakeholder groups to address changes in practice.
6. Best practice approaches in soil tillage should be promoted.
7. Supportive of policy to maintain substantive areas of soil for production for future generations, however consideration needs to be given to avoiding inadvertently eliminating incentives, such as subdivision, to be considered in order to address other resource issues such as water quality.
8. RPS must be careful when developing policy on the most productive soils that it is not implied that less significant soils are suitable for development of some kind.

### **Solid Energy New Zealand Ltd**

1. Supports RPS to guide district plans identify where residential and other types of development are appropriate or inappropriate (to address land fragmentation and access to quality soils).

### **Tatua**

1. Education will continue to be the primary tool for improving soil management practices.
2. Improvements in soil management are continuing, primarily in response to impacts on pasture performance.
3. Have observed a decrease in average stocking rate for our supply farms.

### **Taupo District Council**

1. Notes whilst much of the soil resources around the Taupo District are not recognised as high class; fragmentation of production rural land is still a significant issue in terms of reducing future potential production.
2. While we recognise that the RPS will need to reflect the greater value of higher class soils, we believe this issue of fragmentation is not simply limited to those high

class soils. To do so would potentially undervalue lower class soils that might well have a higher economic value in the future, for example viticulture.

3. TDC has tried to deal with this issue of land fragmentation through Plan Change 19 to the Taupo District Plan. That Plan Change seeks to put in place more restrictive lots size triggers and encourage allotment sizes where land owners are more likely to undertake rural activities and have an affinity with the surrounding rural environment. TDC encourages moves to support this approach to controlling land fragmentation through the RPS.

### **The Councils**

1. Support an approach that requires future options for the 'best and highest' use of elite and high quality soils to be considered.
2. High quality soils need to be protected from urban subdivision, but ultimately the solutions to this issue should be determined at a local level.
3. The Councils do not support the use of targets for soil quality.
4. Focus on industry in terms of soil contamination.
5. Does not support unnecessary regulation or a 'one size fits all' approach for the management of the soil resource.
6. Erosion is best addressed by providing best practice advice.
7. Soil compaction is an issue.
8. Considers that the issue of cadmium and fluoride naturally contained in phosphate fertilisers should be dealt with as a soil issue. In addressing cadmium in soils, the RPS needs to take cognisance of the national Cadmium Working Group.
9. The RPS should take a lead role in managing contaminated land and soil quality in relation to diffuse, low level contaminants.

### **Ngati Tuwharetoa Maori Trust Board**

1. New RPS should support and subtly enforce changes in industrial and agrarian behaviours which currently degrade the quality of soils.
2. Would not support a regulation-based approach on its own.
3. Sub-regional soil profiles need to be explicitly identified in the RPS and the WRP to support new policies encouraging nutrient budgeting and management.
4. Industry and agriculture should be forced into helping to solve problems they have largely created.
5. Methods and policy responses could focus on obligatory remediation accords.
6. Policies of the RPS could also guide methods which include partnerships for specific quality targets, location-specific clean up programmes, remediation education processes around specific contaminants and compulsory erosion mitigation measures.

### **Department of Conservation**

1. Erosion of steep, bare or uncultivated land and contamination of water with effluents, nutrients and soil is an issue that could also be addressed through land use controls that recognise the integrated nature of land use and water.

### **Environment Bay of Plenty**

1. Combine water and soil as an inextricably linked topic.

### **Federated Farmers of New Zealand**

1. Supports the current approach where self-regulation and permitted activity standards are provided for.
2. Recognise that land management practices and not necessarily stock densities and intensification impact on soils; that education of impacts and effects of activities on soil be included in the RPS as a method of achieving outcomes; and that the RPS does not focus on good quality soils to the detriment of other classes but retains flexibility to conserve a wide variety of soils.

### **Fonterra Co-operative Group Limited**

1. Supports the use of self regulation through the use of permitted activity conditions.

2. Supports Environment Waikato's Project Watershed and Peninsula Project.
3. Supports the need for the RPS to address the spread of urban development to protect productive land.
4. Notes that above agronomic optimum phosphorus levels on flat/rolling dairy land may not have any effect on phosphorus levels in surface water.
5. Excessive fertility in relation to phosphorus may not have any environmental effect.
6. The management of DDT in soils in dairy farming situations should not be overstated as a concern as it can be suitably managed through farm management decisions.
7. Supports the development of a sustainable agriculture strategy – seeks the relationship between strategy and RPS is clear.
8. Recognises the future benefits to its suppliers in protecting and enhancing the productive capability of soils – submits that educational and permitted activity mechanisms will be the most efficient way of achieving this.

#### **Te Kotuku Whenua & Tainui Hapu**

1. Targeted approach is supported along with priorities and timeframes. Prefer a more regulatory approach for nutrient reduction.
2. Catchment-based targets supported.

#### **Waikato-Tainui Te Kauhanganui Incorporated**

1. Requests the RPS promote a wider use of nutrient budgets and set targets to avoid further degradation of soil resources.

#### **Waikato District Council**

1. Supports the adoption of tools such as low impact stormwater design and notes that Greater Wellington Regional Council has undertaken work in this area.

#### **Waitomo District Council**

1. Concerned at suggestion the RPS could take a less permissive approach.
2. Care must be taken to ensure that restrictions are not imposed to gain doubtful environmental gain at the cost of making agriculture economically unsustainable.

# 5 Marine

## **Ballance Agri-Nutrients Limited**

1. Support defining and mapping extent of coastal environment.
2. Consider zoning an appropriate management tool that could be effectively used in the CMA.
3. Clearly address the connection between land use management practices and coastal impacts such as water quality and estuarine aggradation – expected that policy focus will tend towards addressing priority areas.

## **Mighty River Power**

1. Supports the recognition of the renewable resources within the coastal marine area. This resource and its significance should be given due regard in any decisions relating to the allocation of marine space.
2. Considers that Environment Waikato should approach the allocation of marine space through the identification of areas within which development should be restricted and/or limited, and leave the allocation of the remaining areas to those investing in the use and development of coastal resources, subject to appropriate environmental controls. It is important that the Council does not promote the blanket protection of the coastal marine area as it would be inconsistent with Part II of the RMA.
3. Support defining the extent of the coastal environment. However, Mighty River Power is conscious of the fact that identifying the extent of the coastal environment, to a level that will withstand scrutiny on a site-by-site or application-by-application basis will require some detailed work.

## **New Zealand Transport Agency**

1. Recognise the role which the marine environment plays in current and future transportation networks – this is particularly important when considering the allocation of marine space which must take transportation requirements into account alongside other activities.
2. Considers that the environmental effects of marine activities also extend beyond the marine environment itself. Other effects include, but may not be limited to, requirements for access to marine activities from existing transportation networks and the distribution of saltwater on roads as a result of transporting products from the aquaculture industry.

## **Department of Conservation**

1. Supports the precautionary approach proposed and the implantation of RMA s6 and NZCPS.

## **EECA**

1. Recognise the potential of the CMA for renewable electricity generation and the associated benefits.

## **Genesis Energy**

1. Recognise the significant potential for renewable energy developments within the coastal environment
2. Restrictive objectives and policies which preclude such development should be avoided.

## **Rotorua District Council**

1. Recognise the impact that water quality can have on coastal environments.

## **The Councils**

1. Support aquaculture and fin fish farming, subject to environmental controls.
2. Address the competition for space and consider the possibility of zoning to ensure that adequate provision is made for aquaculture development.

3. RPS should stay out of the foreshore and seabed area as it is a national issue.

#### **Thames-Coromandel District Council**

1. Expect the outcomes sought in the Coromandel Blueprint project, in relation to the land-sea interface, to become embedded in the RPS in objectives and policies.

#### **Te Kotuku Whenua & Tainui Hapu**

2. Seek Areas of Significant Conservation Value are retained in the RPS.
3. Support a stronger approach to dealing with land-based developments and impacts on the marine environment, and better integration.
4. Defining and mapping the coastal environment is supported.
5. More support for the creation of hapu management plans should be given.
6. Provide direction for coastal science projects to systematically map and provide data to assist TAs and others to reduce impacts in the marine environment.
7. Projects such as Shore Futures supported but require clear direction and budget for implementation.
8. Regarding allocation of space, preferable to nominate areas that cannot be used.
9. Imperative to recognise significant surf breaks per proposed NZCPS policy 20.

#### **Trustpower Limited and King Country Energy Limited**

1. Consider that the precautionary approach should be applied when there is a lack of understanding about the effects of particular activities, and should include adaptive management, which involves the implementation of intensive monitoring and review procedures, and adaptation of mitigation measures implemented as necessary to ensure a desired environmental outcome is achieved.
2. Consider it would be beneficial to map the coastal environment, as well as identifying areas of constraint such as marine reserves.
3. Provisions should not be more restrictive than required by the Act.

#### **Waikato-Tainui Te Kauhanganui Incorporated**

1. Environment Waikato must recognise and provide for iwi management plans relating to west coast harbours to effectively enable those marae to exercise their rights as kaitiaki.

#### **Waitomo District Council**

1. Continuation of the collaboration between Environment Waikato and the west coast councils to find solutions for managing the west coast beaches is supported.
2. Support a pragmatic approach to increase the potential for marine farming, however, note that development of this section of the RPS could probably be delayed until more clarity has been reached regarding the final direction to be indicated by the Aquaculture Legislation Amendment Bill No 2.
3. Investigating the advisability of defining and mapping the extent of the coastal environment is supported provided that any subsequent policies are negotiated with the affected territorial authorities.

#### **Waikato District Council**

1. It is unclear how mapping the landward extent of the coastal environment would then be used, but presumably it would affect the proposed receptive regional/district council jurisdictions.
2. WDC supports the retention of the mean high water springs to define the extent of the respective councils' jurisdictions.
3. As the marine environment is subject to influences from land based activities and pollution, it is logical to provide for consideration of the effects of activities on land on the marine environment and vice versa on the RPS.

# 6 Geothermal

## **Contact Energy Limited**

1. Strongly supports approach proposed in section 2.5 of discussion document – considers geothermal module of existing RPS does not require further review.

## **Department of Conservation**

1. Supports the current approach and recognition of development and protection systems.

## **Environment Bay of Plenty**

1. Supports continued use of the existing geothermal policy provisions.

## **EECA**

1. Supports the issues and approaches identified.

## **Genesis Energy**

1. Recently developed provisions should be retained and taken into account throughout all other relevant sections of the RPS.

## **Rotorua District Council**

1. Agrees with the 'as is' approach proposed for the RPS for geothermal issues.
2. Intends to continue to collaborate with Environment Waikato on geothermal policy matters.

## **Mighty River Power**

1. Supports the current Geothermal chapter including the recent Variation in the RPS.

## **Taupo District Council**

1. Notes the current planning framework for managing geothermal resources has gone through substantial debate in recent years.
2. TDC would support a continued reliance on that planning framework.
3. We will take a keen interest in any proposed changes to the currently agreed framework to ensure that they are not substantive.

# 7 Natural hazards

## **Ballance Agri-Nutrients Limited**

1. RPS should clearly state:
  - Identification of regional risk from natural hazards;
  - Regional and territorial management responsibility and authority; land use planning authority;
  - Responsibility for trial procedures, response to and recovery from hazards events.

## **Byfords Construction Co. Ltd**

1. Environment Waikato must actively and urgently promote the development of a NPS with the appropriate National Standards for managing flood risk.
2. This must include the right of regional councils to access river beds for the purpose of removing any aggregation of gravel that may present the risk of flood events.
3. Consider there should be national policy setting the level of payment to landowners whose land is required to provide access to the river bed for this purpose.

## **Hamilton City Council**

1. Supports the current region/local split in regard to dealing with natural hazards.
2. Does not support Environment Waikato taking on land use planning functions in hazard-prone areas.
3. Supports Environment Waikato providing territorial authorities with information and guidance on hazard areas (in particular for issues relating to hazards and the Waikato River).

## **New Zealand Transport Agency**

1. Supports the identification of hazards in the RPS and through land use planning to avoid development in areas identified as being at significant risk from natural hazards.
2. Notes that route security and provision of transportation infrastructure through and to these areas is a vital issue across the region.

## **Department of Corrections**

1. Include provisions that protect existing and future Department properties from the risk associated with natural hazards.
2. Specifically include provisions which aim to identify area most prone to natural hazards and restrict development within these areas.
3. Opposes proposal to change responsibility for land use planning in hazard prone areas as this would potentially have implications for the Department's activities on both designated and non-designated land.

## **Department of Internal Affairs**

1. Note error in discussion document regarding powers of Minister of Civil Defence.

## **Department of Conservation**

1. Reduction of overall risk is a primary objective – avoidance of known risk areas and hazards that can be avoided should be encouraged with greater emphasis on risk reduction in other areas.

## **GNS Science**

1. Adopt avoidance as the preferred method for managing natural hazard risk, rather than as one option for risk treatment.
2. Identify Reduction of risk as a key objective in the RPS (rather than “effects minimised”).
3. Suggests some wording for strengthening current RPS policies.

4. Seeks Environment Waikato undertake coastal hazard identification and mapping, including the identification of hazard zones, taking into account the potential effects of climate change on coastal hazards.
5. Zoning of marine areas should include provision for the preservation or re-establishment of natural features to mitigate against storm surge, coastal erosion and the effects of tsunamis.
6. Development of the RPS should consider risk reduction initiatives and other hazard management methods outlined in the CDEMG Plan and supporting documents.
7. Notes error in discussion document in relation to the powers of the Minister of CDEM.
8. Seeks that the WRP reflect the objectives of the RPS by including a natural hazards section with specific policies outlining implementation methods for reducing or maintaining current levels of risk.
9. Strengthen the roles of responsibilities of councils by outlining what tasks relating to which hazards are the responsibilities of Environment Waikato and which are for territorial authorities.
10. Policies within the RPS should include baselines or thresholds to be implemented (gives examples).
11. All hazard events should be reported using the MCDEM template.
12. Established methods for measuring community resilience should be adopted and incorporated into regular community surveys.
13. Strongly endorses the use of a risk management framework based on AS/NZS standard 4360/2004 for risk management – should be referred to in the RPS and supporting plans.
14. Precautionary approach is appropriate for managing settlements at risk from high impact, low probability events; and when considering the effects of climate change on the location and frequency of natural hazards.
15. Any reallocation of responsibilities should be temporary (comments relate to some councils lacking the resources to ensure adequate administration and monitoring of policies that ensure risk reduction).
16. Residual risk should be addressed as part of a consultative risk management process.

### **Ministry of Education**

1. Include provisions that protect existing and future schools for the risk associated with natural hazards, with potential method of identifying areas more prone to natural hazards and restrict development within these areas.
2. Opposes the proposal to transfer the responsibility of land use planning in hazard prone areas from District Councils to Regional Councils.
3. Concerned that the existing use rights do not apply to land use activities governed by regional rules as they do with district plan rules. The proposed changes may also affect Education facilities that are designated. Designations only give exemptions to land use rules to District Plans, not Regional Plans. Therefore, additional consents may be required from the Regional Council to establish the structures or building.
4. Considers that a non-regulatory approach involving consultation with the affected landowners would be a more appropriate way of dealing with the issues of land use in hazard prone areas.

### **Mighty River Power**

1. Expects the RPS to provide very clear direction on the allocation of responsibilities in relation to natural hazards. This direction should include the allocation of responsibility for land use controls to territorial authorities to restrict land use development in hazard prone areas.
2. Include policies that require territorial authorities to control land use in hazard prone areas in a consistent manner, particularly where the hazard in question crosses local authority boundaries.
3. Notes that the development within hazard prone areas can also create pressures and inefficiencies for energy generators where the hazard is linked to the existing

use of an energy resource. This occurs in the case of both flood (hydro) and land subsidence (geothermal).

#### **New Zealand Police**

1. Include provisions that protect existing and future New Zealand Police properties from the risk associated with natural hazards.
2. Identify areas prone to natural hazards and restrict development in those areas.
3. Opposes Environment Waikato taking on the responsibility for land use planning in hazards prone areas as it would create uncertainty around existing use rights of New Zealand Police facilities.
4. Consider that a non-regulatory approach involved consultation with the affected landowners on a site specific basis would be a more appropriate way of dealing with the issues of land use in hazard prone areas.

#### **Rotorua District Council**

1. Supports the risk evaluation approach to natural hazards. Avoidance of hazards is preferred to engineering solutions.
2. Welcomes guidelines on acceptable levels of risk, especially where there is integration across regional councils.
3. Guidelines should provide sufficient flexibility for local government to assess developments and applications on a case by case basis.
4. Is critical that the RPS recognise the effects of climate change when dealing with natural hazards.
5. Environment Waikato has an important role in having a coordinated and consistent approach to the identification of areas subject to hazards.
6. RPS should support district councils in identifying geotechnical hazards.
7. Agrees with retaining and enhancing natural defences in regards to natural hazards.
8. Requests further discussion to clarify roles of regional and district councils for hazards.
9. The clarification of the meaning and use of residual risk is supported by Council.

#### **Scanlen, D (individual)**

1. Concerned about Mighty River Power maintaining the water level of Lake Taupo about the minimum control and the impact this may have on the lower Waikato on flood and erosion risks.

#### **Te Kotuku Whenua & Tainui Hapu**

1. Supports the establishment of a clear hierarchy of management responses to put greater emphasis on avoidance rather than mitigation, and requirement for risk assessments of the vulnerability of areas.
2. Adoption of low impact design principles in relation to stormwater for new and existing developments to avoid flooding and instability issues is supported.

#### **Taupo District Council**

1. The discussion on natural hazards appears to have missed out any discussion regarding foreshore erosion around lakes:
  - Accelerated erosion around parts of Lake Taupo in recent years has become an increasing concern.
  - This was one of the factors that prompted Environment Waikato and TDC to prepare the Lake Taupo Erosion and Flood Strategy.
  - During the development of that strategy there has been significant discussion about how the effects of future climate change might be taken into account, particularly with regard to flooding.
  - What those discussions highlighted is the difficulty of applying regional predictions of climate change to localised flood hazard assessment.
2. This is certainly an area where the RPS could provide more direction to avoid the constant re-litigation by territorial authorities.

3. Further thought should be given to the potential to standardise the approach to flood risk management. This could include a generic approach across the region to the level of risk that is planned for.
4. There is some discussion around whether territorial authorities or Environment Waikato are in the better position to manage land use activities in relation to natural hazards. In response,
5. Supports the continued role of territorial authorities for a number of reasons:
  - Territorial authorities are already undertaking the activity with plan provisions in place and Community understanding about who is responsible.
  - Territorial authorities would continue to manage subdivision regardless of any change under the RPS.
  - Territorial authorities also have ongoing responsibilities under the Building Act with regard to managing building in areas prone to natural hazards.
  - The only reason for Environment Waikato to take over the management of land uses would be to prevent or restrict the exercise of existing use rights after a natural disaster.
  - As the discussion document suggests that this is unlikely to happen there would appear to be no reasons for Environment Waikato to take the lead in management of land uses.
6. Strongly support Environment Waikato continuing to take primary responsibility for identifying and providing technical information on natural hazards. This reflects the significant in-house expertise that Environment Waikato has and the desirability of a consistent approach to information provision.

#### **The Councils**

1. Opposed to any role that regional council may take in landuse controls to address hazard zones.
2. Consider that territorial authorities are dealing with natural hazards in a manner that is appropriate to local circumstances.
3. Opposed to the RPS overriding existing use rights. While avoidance of risk is the best option to use for new development in hazard-prone areas, mitigation can be an appropriate response for existing development.
4. Consider that if the community wants to accept risks that are not life-threatening, then they should be allowed to live in that area.
5. Want to work with Environment Waikato to define realistic natural hazard zones before it adopts a position regarding natural hazard management. One possible approach is for the RPS to confine itself to natural hazards that pose a threat to life and limb.

#### **Trustpower Limited and King Country Energy Limited**

1. Consider that land use planning with regard to hazard prone areas should remain the responsibility of territorial councils.
2. Appropriate that the RPS provide guidance regarding natural hazards and options for reducing risk.
3. Consider that better integration between the relevant local authorities in carrying out their respective functions is appropriate.
4. Note that avoidance of risk is not always possible – risk should be minimised, and appropriate measures and plans implemented as opposed to putting greater emphasis on the avoidance of risks entirely.

#### **Waikato-Tainui Te Kauhanganui Incorporated**

1. Support the purpose and function of the existing catchment management schemes.
2. Develop policy that promotes the protection of sites of significance to tangata whenua.
3. Responsibilities and coordination of land use in hazard area should remain with Environment Waikato if the effects of that land use impact hazard areas that in turn have an effect on water quality in surrounding environments.

**Waikato District Council**

1. Recognise the development of a National Policy Statement as well as a National Environmental Standard for managing flood risk signals an intention at a national level to focus more strongly on flood risk issues.
2. It is appropriate that these issues are explored further and a more robust approach taken in the RPS.
3. Future approaches need to place a greater emphasise on avoidance, rather mitigation, in order to reduce risk.
4. Does not support a re-allocation of responsibility for land use planning within hazard-prone areas from territorial authorities to the regional council.
5. There is sufficient scope within the existing allocation of responsibilities to address flood risk more effectively through greater cooperation and collaboration between Environment Waikato and district councils.
6. Identification of hazard zones and ensuring appropriate management of development in these areas is an area where district and regional councils can work closely together to improve land use planning outcomes. In this case, the concept is Environment Waikato provides the technical information and district councils undertake a variation/plan change to their district plans.

**Waitomo District Council**

1. Support Environment Waikato reallocating land use planning in hazard prone areas as a regional function (and being the lead agency in the battle against coastal erosion), however, concerned about detail and wish to be involved in developing this.
2. Low impact stormwater design concept supported provided a fit-for-purpose policy is designed that differentiates between low impact and high impact areas, and seek further input.

# 8 Hazardous substances and contaminated land

## **Ballance Agri-Nutrients Limited**

1. Evidence is very clear that significant risk or adverse effect from elevated cadmium and fluorine in soils does not exist; further, a national strategy to manage any future risk associated with cadmium accumulation in soils mitigates the need for a response at a regional level through the RPS.
2. Assessment of levels of cadmium and fluorine is unwarranted, not a priority for the region and should be removed from RPS.
3. Inclusion within RPS is inconsistent with Environment Waikato's participation in national working party.
4. RPS should focus on only two areas:
  - management of contaminated sites, the risk and potential to cause adverse effects on the environment and human health; and
  - avoiding, remedying or mitigating adverse environmental effects associated
5. The storage, use, transportation and disposal of hazardous substances should be dealt with in the 'Land' chapter.

## **Carter Holt Harvey**

1. Concerned that the benefits of hazardous substances may be overshadowed by concerns related to potential adverse effects and /or past use and practice.
2. Supports recognition that past use of some chemicals may have resulted in situations deemed less than desirable based on today's understanding.
3. Seeks policy is developed that reflects:
  - A scientific and technical understanding of the risks from particular substances is required before judgement can be made of the actual risk to the environment and to people from a given set of circumstances;
  - Remediation via elimination is not always possible and can prove counterproductive (recognising that contamination removed from one site has to be deposited somewhere);
  - Appropriate management of the actual or potential risks from a site or class of sites can frequently enable their cost effective "treatment" by control on subsequent land use – not always necessary to remediate if the risks can be managed by limiting uses.
1. An unreasonably punitive and/or precautionary approach could prove counterproductive if the net result was abandonment and/or costly litigation.

## **Contact Energy Limited**

1. Considers there is little need for RMA controls on hazardous substances given HSNO legislation.

## **Hamilton City Council**

1. Recommends that hazardous substances and contaminated land be dealt with separately in the RPS and should cover current storage, use, disposal and transportation of hazardous substances by industrial activity. Section should also cover the identification of contaminated land and the remediation or management of this land.
2. Supports the retention of current approach to identifying contaminated sites and welcomes the opportunity to work with Environment Waikato to identify and manage high risk sites in Hamilton.
3. Wants Environment Waikato to define their function under s30 RMA and what they seek to achieve as a result of this.
4. Strongly advocate the use of an updated Hazardous Facilities Screening Procedure by territorial authorities to promote consistency throughout the region in dealing with hazardous substances and will ensure that site-specific

circumstances are taken into account. Any allocation of functions to territorial authorities must be consistent with their role under s31 RMA in terms of land use and within the scope of the regulatory functions of s97 HSNO Act.

#### **Latitude Planning Services**

1. Suggests that Environment Waikato should offer a shared service approach to dealing with hazardous substances, contaminated sites and their remediation.

#### **Ministry of Education**

1. Include provisions to ensure that potential adverse nuisance and health effects associated with hazardous substances and contaminated sites does not occur within the vicinity of schools.

#### **New Zealand Transport Agency**

1. Transportation of hazardous substances should be dealt through risk-based assessments on designated routes developed in conjunction with road controlling authorities.

#### **Department of Corrections**

1. Include provisions to ensure that potential adverse nuisance and health effects associated with hazardous substances, contaminated sites and the inefficient use and disposal of recoverable materials does not occur within the vicinity of the Department's sites.

#### **Federated Farmers of New Zealand**

1. Encourage partnerships between industry suppliers and users of agrichemicals to be developed.
2. Acknowledge that contamination was undertaken using best practice at the time, and to develop policy and funding strategies that are equitable to current landowners and incentivise them to be part of the process of decontamination.

#### **Fonterra Co-operative Group Limited**

1. Requests that any further references to DDT reflect Fonterra Co-operative Group Limited's current standards and references to the data set are correct.
2. Suggests that any references to cadmium as a contaminant are removed from the RPS.
3. Environment Waikato should take an effects based approach to the accumulation of contaminants in agricultural soils.
4. Suggests use of the word "contaminant" is reviewed (not relevant in relation to cadmium and fluorine).

#### **Genesis Energy**

1. Do not include additional controls for hazardous substances as there is already extensive regulation contained within the RMA and other legislation.

#### **New Zealand Fertiliser Manufacturers' Research Association**

1. Seriously concerned that reasonable and consistent standards in the application of regional council processes have not been met due to a policy for application of contaminated land procedures to address the gradual low level and diffuse accumulation of contaminants in agricultural soils.
2. The application of the contaminated land policy to address gradual accumulation of diffuse, low level contaminants such as cadmium in agricultural land has the potential to declare large tracts of productive soil legally 'contaminated land' in the absence of any adverse effects.
3. The approach outlined in the discussion document has potentially devastating consequences to New Zealand's image and economy. Totally opposed to this approach and to describing some areas of Waikato's agricultural landscape as 'contaminated' and requiring remediation.

4. Recommends that programmes for the protection of soil quality be developed in close liaison with industry, central government and other regional councils.
5. The fertiliser industry would like to work with Environment Waikato on an approach that links soil contaminant levels with specific management actions.

#### **New Zealand Police**

1. Ensure that potential adverse nuisance and health effects associated with hazardous substances, contaminated sites and the inefficient use and disposal of recoverable materials does not occur within the vicinity of New Zealand Police sites.

#### **Rotorua District Council**

1. Favours an integrated approach led by Environment Waikato.
2. Recognise and respond to the large-scale contamination being introduced to the landscape by farm practices.
3. Encourages the clarification of responsibilities regarding contaminated land.
4. Setting guideline targets for persistent agricultural residues will be useful in some instances, particularly where significant urban development will occur over historically indicative sites – this should be addressed within the growth and development section.
5. Accumulation of cadmium in agricultural soils is a concern.
6. Consistency with other councils is crucial, however, note that “safe” levels of contamination is not yet clear cut from a national policy standpoint.

#### **Te Kotuku Whenua & Tainui Hapu**

1. Retain the current approach and strengthen the policies.
2. Mapping sites is crucial.
3. Alarmed that budget reduced for removal of agrichemicals through LTCCP.
4. Contaminated land should be identified and strong consideration of bioremediation techniques should be advanced.
5. Concerned at lack of willingness to research and map sheep dip sites.

#### **The Councils**

1. Does not support dealing with hazardous substances and contaminated land in an interventionist manner.
2. Environment Waikato and territorial authorities should debate an appropriate definition for what will be classed as ‘contaminated land’ rather than adopting the RMA definition.
3. Environment Waikato’s role of collection and disposal of agrichemicals should continue and should be reflected in the RPS.
4. Identification of contaminated land needs to separate land that is contaminated from land that may be a concern from past use (such as sheep dips).
5. Environment Waikato should provide advice for territorial authorities to implement in regard to functions for hazardous substances.
6. The Hazardous Facilities Screening Procedure is too complicated and unnecessary for the smaller development proposals.
7. Accumulation of contaminants in agricultural soils should be managed by lobbying industry and providing advice and ‘best practice’ guidance to farmers.

#### **Trustpower Limited and King Country Energy Limited**

1. The careful use and storage of hazardous substances does not result in a contaminated site, therefore, consider that the provisions relating to hazardous substances and contaminated sites should be separate.
2. Provisions in the RPS should be consistent with HSNO Act provisions implemented by ERMA.

#### **Waikato District Council**

1. Clearly identify the roles and responsibilities of district and regional councils with respect to hazardous substances.

2. Supports carrying over the current approach.
3. Regulate hazardous substances through district plans despite controls established under the Hazardous Substances and New Organisms Act and ERMA. The Waikato District Council Proposed District Plan regulates the 'location and volume' of specified hazardous substances; for example, the Heavy Industrial zone allows for higher levels of on site storage of hazardous substances as a permitted activity than in more sensitive areas.
4. Do not support the RPS specifying how a territorial authority should exercise its responsibilities, but would support guidance and provision of information to promote consistency across the region.
5. Support inclusion of a procedure for establishing a regional database (with maps) identified contaminated land and sites with high levels of hazardous substances stored on-site. The database could, for example, identify existing contaminated land, land identified for remediation, and land that have been remediation in the past.

**Waitomo District Council**

1. Does not support transfer of function to identify contaminated land function to territorial authorities.
2. Rules can be made in district plans on the use of contaminated land on condition that such land is identified by the regional council.
3. Concerned at an apparent bias against agriculture in this and other sections of the Discussion Document.

# 9 Waste

## **Ballance Agri-Nutrients Limited**

1. Important that RPS continues to have a chapter on waste (albeit brief). Chapter should describe the legislative requirements and responsibilities and set out methods related to an overriding waste minimisation policy

## **Carter Holt Harvey**

1. Do not consider need specific waste or waste minimisation acknowledgement or provisions within the RPS.
2. Regional Plan need only recognise that the adverse effects of waste management are and will continue to be actively addressed along with all other resource use. Including in RPS would only duplicate recently enacted Waste Minimisation Act.

## **Department of Conservation**

1. Support inclusion of a waste minimisation chapter in the RPS. Education and minimising waste creation in the first instance need to be prioritised in the RPS.

## **Hamilton City Council**

1. Waste should be kept as a separate section in the RPS so the issues do not become fragmented.

## **Johns, W (individual)**

1. Supports Waste minimisation being a stand-alone topic in Community Wellbeing.

## **Newmont Waihi Gold**

1. Concerned if tailings and waste rock were to be subjected to inappropriate objectives and policies due to them being inadvertently caught within the definition of 'waste'.
2. Supports the wording in the 'Waste' chapter of the current RPS.

## **The Councils**

1. Do not support a specific chapter on waste.
2. District councils should be encouraged to deal with solid waste as part of land use consent applications.

## **Rotorua District Council**

1. Do not need to be in RPS and are more aligned with LGA functions than RMA
2. Regulatory response probably best dealt with at national level, however, advocacy, education and civic leadership are valid and important roles rightly provided for

## **Solid Energy New Zealand Ltd**

1. RPS should provide policy direction to district councils to encourage support strategies that turn waste products into useful products.
2. RPS should also provide policy direction to territorial authorities that enable short trial exploration work to be carried out as a permitted activity.

## **Taupo District Council**

1. It is unnecessary for the RPS to have a separate chapter on waste.

## **Waitomo District Council**

1. Waste does not need to be addressed in a separate chapter of the RPS.
2. Continuation of the role of EW in the coordination of waste education programmes and removing barriers to greater waste minimisation is supported.

# 10 Historic heritage, landscape and natural character

## ACRE

1. Support recognition of landscapes and natural values as important
2. Rigorous preservation and protection for significant areas should be encouraged.

## Wairakei Pastoral Ltd

1. Support RPS should provide regional guidance for identifying and managing outstanding natural landscapes using accepted criteria (e.g. Pigeon Bay criteria) and best survey and analysis techniques.

## Department of Conservation

1. Supports inclusion in RPS, in particular outstanding natural landscapes and features.

## Genesis Energy

1. Landscape provisions should not unnecessarily restrict the potential for a variety of uses of land; should recognise and provide for the important role mitigation can play in sustainable management; and should allow for the effects of activities on landscape values to be addressed on a case-by-case basis.
2. The regional assessment of landscape values should focus on those which are truly outstanding in the context of s6(b) RMA rather than taking a broader approach.

## Hamilton City Council

1. Heritage management is most appropriately dealt with at district council level.
2. Environment Waikato's role should be to promote heritage, facilitate and coordinate working together to protect and manage heritage and provide guidance.
3. Concerned that there may be confusion with the current RPS approach to classifying heritage.
4. Clarification needs to be provided on how the assessment criteria in Appendix 4 of the current RPS should be applied to determine what is regionally significant. Recommends that heritage resources are identified by district councils.
5. Does not consider it necessary for policies to be created in the RPS to deal with previously unidentified historic heritage.
6. Suggests that landscape and natural character policies are included in the RPS. The criteria for identifying these areas needs to be robust.
7. Supports Environment Waikato identifying regionally significant outstanding natural features, but areas that have local significance should be left to the territorial authorities.
8. Where an outstanding landscape feature crosses into an urban environment the RPS should recognise that a different management regime may be appropriate.

## Mighty River Power

1. Considers that the RPS should take a 'no net loss' approach to the preservation and protection of landscape and natural character.
2. It is important that the RPS does not seek blanket protection of these values, recognising that there will be instances where development will be appropriate within areas with high landscape values or natural character.
3. Include policies which:
  - Set regionally consistent criteria for the identification of Outstanding Natural Features and Landscapes (ONFL) and for determining the degree of natural character within ONFLs or the coastal environment;
  - Require territorial authorities to identify and protect ONFLs and areas of high natural character from inappropriate subdivision, use and development through their district plans;

- Provide guidance on what would constitute 'inappropriate' subdivision, use and development.
4. Not necessary for Regional Councils to map or identify particular ONFLs in the RPS.
  5. Should Environment Waikato pursue the inclusion of objectives and policies relating to amenity landscapes, it would need to carefully consider whether such provisions fit within its function under s30 (1) (b) RMA.
  6. Regarding historical heritage, it is important that the RPS makes a clear distinction between landscape and natural character values so that the clear differences in management direction signalled by s6 of the RMA are reflected in the RPS.
  7. Any criteria developed for historical heritage needs to ensure that the protection given to maintain the integrity of an historical heritage feature also recognises the ability to continue to use and operate buildings and structures as part of a working environment.

### **Taupo District Council**

1. Landscape and natural character vary considerably throughout the region, and the character of these areas is largely dependant on the types of land use that occurs. Most land use activities that have the potential to significantly affect landscape character are governed at district level, and as a result many districts have varying landscape characteristics.
2. If the RPS is to identify these at a regional level, criteria will need to be included. Such criteria will need to be clear on how regionally important landscapes differ from identifying outstanding natural features and landscapes at a district level.
3. It tends to be the more locally important landscapes that are at threat from change or loss of natural character, rather than those that are regionally, nationally, or internationally significant.
4. A landscape that is considered important at a regional level is more likely to be considered important at a district level, than the converse. It seems more appropriate to focus landscape identification, management, and maintenance at a district level where the land use activities that have the potential to significantly affect landscape character are already addressed by District Councils.
5. TDC is currently working through the First Schedule process with the Community in relation to Plan Change 24 and Variation 25:
  - This Plan Change is the culmination of over five years of work and ongoing consultation with interest groups, land owners, iwi and hapu groups and the wider community.
  - This process reflects the importance of involving the community as part of landscape identification.
6. Methods used to identify and protect the landscapes in the Taupo District and therefore the four regions to which the district belongs to, are best determined at a District wide level. In terms of criteria to identify outstanding natural features and landscapes

### **Tatua**

1. Any moves to "protect" existing landscape features or habitats must be cognisant of private property rights.
2. In such cases the use of education should be the primary tool, or in specific cases negotiated settlements with appropriate compensation should be pursued.

### **Natural Solutions**

1. Address the natural character of wetlands, rivers and their margins.
2. Address the natural character of other aquatic ecosystems outside the coastal environment.

### **Newmont Waihi Gold**

1. Supports in principle the new work underway to provide a regional perspective on landscape, particularly outstanding natural landscapes and features.

2. Support is conditional upon this information being made available for public submission.

#### **New Zealand Forest Managers Ltd**

1. Environment Waikato must develop a robust and objective process and measures for valuing landscapes and natural areas. The current process of valuing landscapes and natural areas is highly subjective.
2. The RPS should not advocate for the restoration of landscape sites unless it is clearly justified and explained how restoration relates to Council's statutory requirements under the RMA.
3. Territorial authorities should deal with landscape issues and subdivision as they have the local experience necessary to manage this issue effectively. Including criteria within the RPS to assist with establishing when development or subdivision might be inappropriate may result in district plans being inconsistent with the RPS and therefore require changes to ensure they give effect to the RPS as required under s73 (4)(a) of the Act.

#### **Solid Energy New Zealand Ltd**

1. RPS should concentrate on policies that focus on the identification and management of outstanding natural landscapes and features, and areas where there is a high degree of natural character and regional significance.

#### **The Councils**

1. Heritage and landscape issues are best dealt with at a local level by territorial councils.
2. The RPS could set an agreed timeline for dealing with heritage and landscape issues.
3. Environment Waikato should identify uniform criteria for natural landscapes only and concern itself with regionally important landscapes.
4. Concerned that Environment Waikato will have to find funding for potential future involvement in culture, heritage and landscape management.
5. The RPS should deal with the impact of cumulative effects of growth and development on landscape by taking a region-wide approach.
6. Identifying and managing regionally significant outstanding natural landscapes should be a regional responsibility.
7. Environment Waikato should preserve natural character and historic heritage and cultural values by providing share resources, information and advice where required.
8. Environment Waikato should provide guidelines for heritage management only.

#### **Trustpower Limited and King Country Energy Limited**

1. Consider it appropriate for regulatory measures to be implemented in district plans and guided by the RPS to protect outstanding natural landscapes and features
2. Note that protection should not be at the detriment of existing lawfully established activities and their operation, repair, maintenance and reasonable development.
3. Consider it is inappropriate to protect amenity landscapes.
4. RPS should advocate for the protection of ONFL, and maintain and as appropriate, enhance amenity landscapes and features.
5. Enhancement should only occur when practicable and not at the detriment of other Part II matters or when it will cause adverse consequences to existing lawfully established activities.
6. Consider the identification of ONFL on planning maps would be beneficial but note that the criteria for their identification should be established by suitably qualified independent experts.

#### **Rotorua District Council**

1. Encourage an integrated approach with Environment Waikato.
2. Suggest guidance in terms of identification of landscapes is likely to be unnecessary given district council work already undertaken.

3. Note there should be a consistent message from local and regional perspective.
4. Encourage Environment Waikato to focus on natural character rather than 'rural character' or general amenity.
5. Encourage an approach that recognises working nature of rural environment.
6. Appropriate to guide the identification and classification of historic heritage through the RPS – collaborative approach with district councils appropriate.
7. RPS should not place undue expectations in terms of the collection of this information and timeframes and financial commitment required.
8. Note the cross-over between the broad definition of historic heritage in the RMA and the statutory responsibilities of the NZHPT.
9. Care should be exercised when addressing cultural gap between the approach and mandate of NZHPT and that of Iwi – in particular, conflict between NZHPT's mandate to examine and record and the desire of Iwi for discretion and to have highly significant sites left alone.
10. Note cultural assessments may be an appropriate first step and may provide guidance to establish hierarchy/priority of matters for protection/assessment.
11. Non-regulatory measures are strongly encouraged to support the role of NZHPT in terms of funding for identification and restoration of sites.

#### **Waikato-Tainui Te Kauhanganui Incorporated**

1. Historically important sites need to be identified and protected if not already.
2. Environment Waikato must take a coordinated approach in the management of culture and heritage areas, as landowners and managers of designated purpose lands.
3. Policy needs to direct the importance of cultural sites in coastal towns.
4. Greater role needs to be given to tangata whenua in the ownership of its history, knowledge of the sites and the manner in which the sites of significance are managed and protected.
5. Provide policy that will enable tangata whenua to enforce protection mechanisms and penalties.

#### **New Zealand Historic Places Trust**

1. Supports the contents of Chapter 3 of the Discussion Document as it relates to historic heritage and notes the council's intent to better reflect RMA s6 amendments.
2. Supports methods to modify the existing RPS criteria to reflect the values contained within the RMA definition of historic heritage and provide clear guidance on how these criteria should be applied to assess the significance of the finite historic heritage resource.
3. Support measures to develop and incorporate cultural impact assessments and the development of policies to address cross boundary issues and previously unidentified historic heritage.
4. Refers to and attaches *Sustainable Management of Historic Heritage: Guide No. 1: Regional Policy Statements* – which aims to assist regional councils in the protection and conservation of historic heritage through regional policy statements.

#### **Waikato District Council**

1. Notes that it is important that Environment Waikato does not duplicate work already being undertaken by district councils in this area. However, there is clearly a role for regional council in providing a regional perspective on landscape.
2. Territorial authorities already recognise and provide for the protection of outstanding natural features and landscapes from inappropriate subdivision, use and development under s6(b) RMA.
3. There is a lack of a consistent approach across the region in terms of identification and management of outstanding natural features and landscapes, and in particular for amenity landscapes.
4. A consistent approach across region would be of particular benefit where development crosses territorial boundaries, as for example has occurred with the Contact Energy Limited windfarm proposal.

5. Another emerging area where the regional council can add value is cultural landscapes. Few territorial authorities in the Waikato region have addressed cultural landscapes in their district plans and there is scope for the regional council to contribute in this area.
6. Territorial authorities have traditionally managed built heritage issues and have the expertise to do this. Unnecessary duplication should be avoided, but may wish to embrace a role in compiling a regional heritage database and in coordinating regional initiatives.
7. Support the modification of existing criteria to reflect the values on the RMA definition of historic heritage.
8. Support promotion of non-regulatory mechanisms such as advocacy, provision of information consideration for promoting regional integration and co-operation across the region.

**Waitomo District Council**

1. RPS can play an important role in integrating regional and territorial functions to manage competing demands on outstanding landscape and natural character values, however, note the NZCPS is undergoing considerable amendments and will require the RPS to be amended.
2. Concerned that limitation of development and subdivision are mooted as measures to promote protection of heritage and landscape – imposition of additional policies and methods should take account of the existing provisions in the District Plan.

# 11 Public access

## **Department of Conservation**

1. Supports the proposal to develop and assess priorities for public access to the CMA and water bodies and their margins – providing guidance on the management of these areas will assist in protecting significant conservation and cultural values.

## **Environment Bay of Plenty**

1. Identify opportunity to work collaboratively on provisions relating to access for RMA s6(d) purposes.
2. Promote the use of criteria not inconsistent with those in Appendix F of the Operative BOP RPS for plan change and resource consent assessment processes.

## **Edens, S (individual)**

1. Considers public access should only be on public land.
2. Does not support taking private land to provide for public access.

## **Genesis Energy**

1. Principles which guide the framework for walking access to land should encompass provisions for public safety.

## **Hamilton City Council**

1. Supports guidance to address the level of access suitable for certain areas such as lakes, rivers and the coast.

## **National Wetland Trust of New Zealand**

1. Supports greater public access to wetlands where sensitive ecological values won't be compromised.
2. Wants the RPS to establish and advocacy and financial support role to support DoC to provide physical access to wetlands.
3. Wants the RPS to recognise the role of community groups in developing appropriate wetland heritage trails in the region.

## **Mighty River Power**

1. Considers the provision for public access needs to be balanced with recognition of the need to avoid negative impacts on the operation and efficiency of existing infrastructure and to ensure the health and safety of the public.

## **New Zealand Forest Managers Ltd**

1. The RPS should provide guidance on the management and enhancement of public access to and along the coast marine area, lakes and rivers to be consistent with the Act.
2. Guidance for the management and enhancement of public access outside these areas should not be included in the RPS.
3. The RPS should clearly state that the guidance provided regarding public access is limited to these specific areas only.
4. The guidance provided within the RPS should not override private property rights.
5. Strongly object to the RPS advocating for greater access to private land without appropriate compensation.

## **Taupo District Council**

1. Clear support from the RPS for setting aside of esplanade and other reserves at the time of subdivision would assist territorial authorities.

## **The Councils**

1. Public access should be advocated in the coastal areas and along the Waikato River.

2. Esplanade reserves and strips should be carefully considered because of the funding implications of acquiring and managing them.
3. A targeted approach of acquiring esplanades to complete strategic connections or where they serve a strategic function should be followed.
4. RPS should identify regionally strategic public access routes.

#### **Trustpower Limited and King Country Energy Limited**

1. Consider that public access rights should not be imposed on privately owned land.
2. Important that access is restricted at particular locations.

#### **Rotorua District Council**

1. Provide guidance on identification and ranking of importance for desirable access – compulsion outside what is provided for in the Act is not desirable.
2. Environment Waikato may wish to make more of the opportunity afforded by regional council input to subdivision applications.
3. Inclusion of the consideration of the effects of climate change in securing access is a positive step, however, need to quantify the effects of climate change is key.
4. Further guidance in terms of specific types of access design and subdivision layout is probably unnecessary.

#### **Waikato-Tainui Te Kauhanganui Incorporated**

1. RPS should provide some form of governance on public access, especially where this may impact on sites of significance or ecologically important sites – these types of sites may benefit by not having access provided to them.
2. Biosecurity should be factored in to policy development.

#### **Waitomo District Council**

1. RPS could be instrumental in providing more guidance on when restrictions on public access are appropriate and could also promote a more coordinated approach between agencies.
2. Notes that the Discussion Document does not refer to the Walking Access Act and is incomplete in this regard.

# 12 Matters of significance to Maori

## Hamilton City Council

1. Supports the proposed approach but wants the 'Matters of Significance to Maori' section to be cross-referenced to other sections of the RPS where the issues are relevant to both sections.
2. Supports the principle of co-management in regards to the Waikato River settlement.

## Ngati Tuwharetoa Maori Trust Board

1. Seeks improvements to the current Memoranda of Understanding instruments presently available and to ensure they are encapsulated within RPS by reference in policies, methods and objectives.
2. RPS should facilitate more dialogue at more levels.
3. Cultural values could support decision making through:
  - Authentic iwi/hapu consultation;
  - Adoption of an agreed framework of cultural congruence and cultural health indicators or measures for specific decision types;
  - Use of agreed principles and operating procedures for including matauranga Maori;
  - Exchange agreements between the council and iwi promoting cultural clearance from iwi before activities are undertaken or approved.
4. It is premature to advocate any firm position on what the RPS should say about the Waikato River Vision and Strategy.
5. RPS should adopt a conservative approach to prescribing co-management while it is being tested in legal and resource management contexts.
6. Iwi management plans require their fullest recognition in the objectives and policies of the RPS which deal with the authorising of management of water, land, heritage sites and biodiversity.

## Environment Bay of Plenty

1. Include criteria for assessing RMA s6(e) matters in plan change and resource consent processes; policies and methods promoting the integration of iwi and hapu management plans into plan change, strategy development and resource consent processes.

## Te Kotuku Whenua & Tainui Hapu

1. Need to change current RPS focuses on process and recognition of the relationships that tangata whenua have with their resources in line with current practice.
2. Objectives and policies are inadequate and the Treaty section needs a complete rewrite.
3. Treaty-based relationships should not be dealt with by Memoranda of Understandings and settlements alone as they mostly do not deal with Hapuu – rights are accorded to Hapuu, therefore relationships should also be forged with Hapuu.
4. Prefer stronger statements to be inserted (in reference to section 2.2 of current RPS). Kahui Mangai site identifies mandated hapu and is a useful consultation tool.
5. Crucial to highlight that Maori are to be part of the decision making process.
6. Funding assistance could be set aside for training for Making Good Decisions programme.
7. RPS could insert additional Maori cultural values, which, along with Maori as decision makers, would ensure those values are part of the decision making process.
8. Consider RPS should be based on the Maori text of the Treaty.

9. Seek that prior to a draft RPS being finalised, hui are held with the hapu and iwi (refer Kahui Mangai).
10. Consult with hapu and iwi on the integration of their management plans within the RPS.
11. Imperative to include in the new CCO software mechanisms that could track consents and evaluate decision making on the Maori requirements.
12. Needs to be a section within the RPS regarding s33 transfers – crucial that it brings guidance on who, how, what and when processes.
13. May be necessary to set out basic guidelines on the principles of co-management – to be effective, co-management must be implemented and achieved at a number of levels and across a range of management agencies.
14. Appropriate that the Vision and Strategy for the Waikato River along with the objectives and strategies be inserted into the RPS.

#### **Rotorua District Council**

1. Issues of capacity building and resourcing are correctly identified in the Discussion Document as being critical to assisting Maori to contribute to planning processes.
2. Day-to-day issues that arise in dealing with Iwi must not be overlooked – clarity in process is important, particularly in relation to roles of local and regional councils; regional councils ideally placed to provide integrated guidance on Iwi issues. Important that local and regional councils maintain dialogue.
3. Regarding sites of significance being scheduled in regional and district plans – processes need to be developed between the parties and important iwi are fully informed and understand what is involved.
4. Environment Waikato should have an open relationship, sharing resources with Iwi so they can undertake their own monitoring and evaluation of progress towards addressing resource management issues of significance and report back to authorities and stakeholders.

#### **Mighty River Power**

1. Has an interest on how the 'Vision and Strategy' for the Waikato River is incorporated into the RPS and how this will be linked to the provisions in the Freshwater chapter and the Regional Plan. Mighty River Power would anticipate and appreciate having the opportunity to work with Environment Waikato and the region's Iwi authorities in this respect.

#### **Waikato-Tainui Te Kauhanganui Incorporated**

1. Supports the submissions of its Marae and management committees with regards to how policies in the RPS should reflect the matters of significance to Maori.
2. RPS should continue to focus on matters of process but aim to be more inclusive of tangata whenua in decision making.

#### **Waitomo District Council**

1. Support any arrangements that could facilitate and enhance interaction to assist local authorities to take account of matters of significance to Maori.

# 13 Energy

## **Ballance Agri-Nutrients Limited**

1. RPS must promote the continued exploration, development, production, transmission and distribution of energy to meet the needs of the region and NZ in the most sustainable manner.
2. "Efficiency" must be accurately defined.
3. Recognise energy supply has effects and integrated management important.
4. Incorporate appropriate zoning to protect economic, environmental and social values while also avoiding reverse sensitivity issues arising.

## **Carter Holt Harvey**

1. Supports recognition given to the role of price in controlling the use of energy, including the undesirable effects of that energy use such as greenhouse gas emissions.
2. Identify the extensive national work occurring as justifying a reduced focus on these issues in the RPS.
3. One area where regional policy could usefully enhance national initiatives is by express acknowledgement of the tradeoffs between mutually exclusive environmental objectives.
4. National Environmental Standard and related policy on air discharges should recognise and provide for potential diminution in local air quality where a countervailing benefit in the form of energy efficiency and climate change resulted.
5. Consider the region's policy should expressly identify the actual and potential effects of utilising wood residue and all other forms of organic waste as greenhouse neutral fuel where it is environmentally logical and financially cost effective to do so.
6. Policy related to renewable energy should explicitly refrain from emphasising or encouraging one form of renewable energy over all others.

## **Contact Energy Limited**

1. Provide strong policy direction that is enabling of renewable energy production consistent with that outlined in the NZ Energy Strategy to 2050 and the Waikato Regional Energy Strategy.
2. Should not go so far as to stipulate specific areas where different forms of energy production are promoted and therefore prevented in other areas.
3. The assessment required to determine the adequacy or otherwise of any particular site for energy production is detailed and extensive and should be left to the developer of the site and assessed on a case-by-case basis through the consenting process.

## **Hamilton City Council**

1. Incorporate the recommendations made in the Waikato Regional Energy Strategy into the RPS.
2. Identify and quantify the potential for renewable energy sources.
3. The RPS should be guided by the National Policy Statement on Electricity Transmission to establish a consistent high level approach to dealing with electricity transmission.
4. Support the principle of self-sufficiency but cautions that it may not be appropriate in all circumstances as there may be local sensitivities and effects of individual general schemes.
5. Notes that it is difficult to give effect to sustainable building design through district plans and that this is more a Building Act issue.
6. Supports the principles developed in FutureProof project that address the demand for energy and encourages energy efficiency.
7. Supports the inclusion of objectives and policies to ensure the location and form of future urban and rural residential development promotes efficient transport and energy use.

### **Ministry of Education**

1. Include provision to ensure an adequate supply of energy is provided for schools within the Waikato region. This will ensure the efficient operation of schools is maintained.

### **Mighty River Power**

1. Notes that the outcomes of the Regional Energy Strategy should be reflected in the RPS.
2. Encourages Environment Waikato to consider how it might use the RPS to influence decision making in relation to all elements of the electricity supply infrastructure necessary to ensure security of energy supply regionally and nationally.
3. Considers that the RPS should seek to improve the efficiency of the use of energy and to maintain and increase the use and development of renewable energy resources. With these broad objectives in mind, the broad policy direction of the RPS should:
  - Support security of electricity supply to communities to ensure that electricity supply is able to match demand;
  - Recognise the benefits that are derived from the use of and development of renewable energy resources;
  - Recognise the supporting role that thermal generation will play when electricity is unable to be generated from the weather dependent sources of renewable energy (hydro and wind);
  - Support the ongoing and efficient operation of existing electricity generation infrastructure;
  - Be consistent with the framework provided in WRP Variation;
  - Recognise that changing technology will increase the range and extent of the energy resources that can be utilised;
  - Recognise that renewable energy resources tend to be fixed in location;
  - Promote energy efficient land use patterns, subdivision and building design;
  - Seek to promote the development of renewable energy resources; and
  - Identify strategic corridors for energy transmission and seek to avoid reverse sensitivity effects on electricity generation and transmission facilities.
4. Does not support attempts to identify the locations of potential energy resources within the RPS.
5. Considers should Environment Waikato want to manage the location of generation from renewable energy resources it would be more appropriate to identify areas that Council considers to be not suitable.

### **New Zealand Transport Agency**

1. Considers that the issues of energy and climate change are closely related and must be considered together in the review of the RPS, particularly with regard to the impacts of transport on these issues.
2. Supports potential approaches of reducing energy demand through more compact urban form and a more integrated approach to planning for infrastructure for energy generation and transmission, and considers that these potential approaches are also key requirements for addressing climate change.
3. Seeks that this should be achieved by adopting a more integrated approach to planning, planning for management of growth, encouraging higher housing densities and better urban design for developments.

### **Department of Corrections**

1. Include provisions to ensure an adequate supply of energy is provided for the Department's facilities.

### **EECA**

1. Supports the identification of energy, in particular geothermal energy, and climate change as significant resource management themes in the RPS.
2. RPS could usefully encourage the uptake of bioenergy.

3. RPS should have regard to additional benefits of renewable energy generation such as the economic benefits for the region in supporting biomass fuel – include reduced wood wastes to landfill, reduced importation of energy and added value to forestry and wood processing sectors through better use of woody by-products.
4. Supports recognition of the extensive renewable resource available in the region.
5. Recognise the significant potential for solar energy (for water heating) and for various scales of renewable energy generation including small-scale generation.
6. Issues section should also make explicit reference to the wider range of regional, national and global benefits of renewable energy generation including increasing security of energy supplies, diversifying energy sources, reducing dependency of external energy supplies, reducing demand for non-renewable energy sources, and reducing GHG emissions.
7. Notes the location, establishment and operation of other land use activities in the vicinity of energy infrastructure may lead to reverse sensitivity effects that have the potential to impact upon its effective and efficient operation.
8. Include strong objectives, policies and methods which: recognise the essential role that infrastructure plays in the functioning of the region;
9. Recognise and provide for the development, operation, maintenance and upgrade of renewable energy activities in the region;
10. Recognise the significant potential for various scales of renewable energy development including wind, hydro, geothermal, bioenergy, marine and solar generation;
11. Recognise the significant local, regional and national benefits of renewable energy generation of various scales and those associated transmission and distribution networks; recognise the locational requirements of renewable energy; manage activities that adversely affect renewable energy infrastructure including reverse sensitivity;
12. Encourage improvements in the efficiency of the end use of energy in particular through the promotion of small-scale distributed energy generation.
13. Include objectives and policies and direct such in district plans which encourage:
  - Development and settlement patterns that: utilise appropriate site orientation in order to support the principles of optimum energy efficiency and solar energy gain; and
  - Facilitate small-scale renewable energy generation; minimise transport requirements and provide, where possible, for alternatives to single occupancy vehicles.

### **Fonterra Co-operative Group Limited**

1. Promote energy efficiency and approaches that allow for surplus energy to be fed back to the national grid, through the development of incentive schemes and education rather than regulation.

### **Genesis Energy**

1. RPS should contain objectives, policies and methods which:
  - Provide for renewable energy;
  - Expressly identify the full range of benefits of renewable energy generation;
  - Recognise and provide for existing and future electricity generation infrastructure and its immense regional and national importance;
  - Protect existing and future electricity generation facilities from reverse sensitivity effects; should recognise the national interest in providing for the full and ongoing utilisation of existing and future electricity generation infrastructure; and
  - Recognise and provide for the practical constraints associated with the development, upgrading, maintenance and operation of new and existing electricity generation activities, including recognition of the constraints imposed by the need for generation facilities to be located close to the energy resource.

### **New Zealand Police**

1. Ensure an adequate supply of energy is provided for New Zealand Police facilities within the Region.

### **Solid Energy New Zealand Ltd**

1. Supports the intention that the Regional Energy Strategy recommendations will be considered in the development of the RPS.
2. Supports the reduced and efficient use of energy in order to reduce adverse effects on the resources upon which they are based.
3. Acknowledge the significant role that energy resources, including coal, currently play in the Waikato and national economy, and support the development of clean coal technologies and new low emission extraction techniques.
4. Identify the locations of all known/potential energy sources in the region and identify the most appropriate areas for development.
5. Acknowledge the importance that coal resources currently play (and will continue to play for foreseeable future); also include renewable biomass.

### **Taupo District Council**

1. Concerned about the ability of Environment Waikato to identify future energy resources, particularly as technological changes will alter the value of such resources over time.
2. Acknowledge the way that the WRP Variation 6 has placed community use of water above corporate (and energy) use. However, re-emphasise that the RPS should not place the use of renewable energy resources for electricity generation in front of community needs.
3. Additionally, TDC is currently identifying the main transmission lines that pass through the district. These are recognised as an important asset and a land use that has constraints in terms of its potential location.
4. Recognise existing transmission routes.

### **Transpower New Zealand Limited**

1. Refers to comments made on Waikato Regional Energy Strategy.
2. Supports reference in the RPS to regionally significant infrastructure, however, considers it important that the National Grid be specifically identified and that the imperatives in the NPS on Electricity Transmission are appropriately reflected in the RPS.
3. Four key themes need to be addressed:
  - Providing for the benefits of the National Grid;
  - Providing for existing National Grid transmission infrastructure;
  - Protecting the National Grid transmission infrastructure from reverse sensitivity issues; and
  - Providing for new National Grid infrastructure.
4. Any debate on the merits of energy sustainability should be directed at the generation of power rather than its transmission.
5. In providing for the existing National Grid, there are four key issues that need to be considered: ensuring the operation, maintenance and upgrading of existing lines is largely unfettered; identification and provision of transmission corridors; identification of sensitive areas; and realignment of existing lines.
6. RPS policy needs to be able to give effect to NPS (Electricity transmission) policies 2, 3 and 5.
7. Provide guidance to regional and district plans to ensure there is consistency across the various territorial boundaries.
8. Indicate that the operation, maintenance and minor upgrading of the existing lines should generally be unfettered (i.e. permitted).
9. Future under building should be discouraged by locating future growth areas away from these corridors.
10. Promote consistency by, for example, setting a clear definition of what constitutes minor upgrading (includes suggested wording).
11. Removal of MVA thresholds should be promoted.

12. For consistency identify appropriate buffers to protect National Grid from reverse sensitivity effects (required by NPS (Electricity transmission))
13. Wishes to see a buffer corridor based on Transpower New Zealand Limited's existing Corridor Management Policy (will provide the data to EW in suitable electronic form and at no cost).
14. Requests methods to identify that Transpower New Zealand Limited be served for any subdivision or development, resource consent application or review that is within the corridor.
15. Concerned at how any regulation relating to the identification in the RPS of values such as outstanding natural features and landscapes or biodiversity could compromise existing transmission infrastructure traversing such areas – identification of transmission corridors around existing assets is essential to ensure ongoing operation, maintenance and upgrading of the network is not inappropriately fettered.
16. Reverse sensitivity needs to be specifically identified in the RPS in policy terms.
17. Adequately provide for the core electricity transmission infrastructure that is required to support growth within the region and beyond to connect to new generation sources.

#### **Te Kotuku Whenua & Tainui Hapu**

1. Retain the section on energy efficiency with a focus on low energy use and sustainable building design or compact urban form.
2. Regulatory approach is required.
3. Opposed to the identification of known potential energy sources particularly within the coastal and marine areas. Any list of emerging new technologies must take into consideration the impacts on Maori and communities along with an analysis of environmental considerations.
4. Policy direction on how individuals can make contributions to the national grid would be helpful.
5. Support policy for micro renewable energy and incentives to retrofit houses. as well as the need for a more proactive approach to reducing the effects

#### **Trustpower Limited and King Country Energy Limited**

1. Support proposed approach of recognising the potential for use of renewable resources while recognising the constraints faced.
2. Recognise the benefits to be derived from the use and development of renewable electricity generation schemes.
3. Consider policies and methods to support and enable the development of renewable generation schemes are appropriate.
4. Consider it beneficial to highlight those areas where new renewable generation may be constrained / subject to more restrictive provisions, such as areas that support significant environmental values and areas that are sensitive to development.
5. Consider an approach to identify and provide for low impact emerging and/or experimental renewable generation technologies is appropriate.
6. RPS should recognise the national significance of renewable generation and the Government's renewable energy target.

#### **Rotorua District Council**

1. RPS will need to align with NPS for Electricity Transmission and be mindful of the likely contents of the NPS on Renewable Energy.
2. Protection of networks cannot be at the expense of environmental, social and economic impacts.
3. There is more onus on the RPS to ensure those landscapes and environments worthy of protection are sufficiently recognised and balanced against the need to protect transmission networks.
4. Passive approaches including urban design and construction, transport network design and consideration of climate change should also be addressed within those relevant sections of the RPS.

5. Acknowledge that renewable energy technologies are advancing very rapidly and be open to new technology.
6. Identification of areas more suitable for renewable energy are supported – this will give the public some certainty about where these activities are more likely and more suitable.

#### **Waikato-Tainui Te Kauhanganui Incorporated**

1. Promotes the use of renewable energy but no longer at the expense of its sites of significance.
2. Established energy generating industries should continue to aim to improve their practices, avoid potential impacts and offset existing impacts.
3. Do not want the RPS to identify the locations of known potential energy resources.
4. Policy should promote that the development of new energy sources be located nearest the area of demand.

#### **Waitomo District Council**

1. Support policies to promote the development of renewable energy sources.
2. Notes that any conditions of buildings as to energy efficiency that are repugnant to the Building Code will be null and void.

#### **WEL Networks**

1. Supports policy approaches that encourage the reduction of energy demand and promote sustainable building design on a regional basis.
2. WEL Networks has recently been granted resource consent for the construction of a wind farm near Te Uku and is seeking to expand its renewable energy portfolio.
3. Supports the approach energy (p.44) that promotes the development of renewable energy in the Waikato and considers the RPS should include policies that protect existing and future renewable energy generation sites.

#### **Waikato District Council**

1. Supports the inclusion of an RPS policy framework that recognises and promotes renewable energy; for example, the RPS could identify the need to provide for emerging technologies.
2. The discussion document raises the issue of identification of known/potential energy resources and potential corridors for electricity transmission. This may be useful if it is proposed to be non-regulatory, but sufficient certainty is desirable if such information were to be used in a regulatory context. For example, identification of future electricity corridors with a view to directing development away from these potential corridors is not supported; the designation process is available to requiring authorities wishing to protect future corridors.

# 14 Climate change

## **ACRE**

1. Questions how the region will play its part in the reduction of CO<sub>2</sub> emissions.

## **Ballance Agri-Nutrients Limited**

1. Focus solely on responding to the effects of climate change through adaptation.
2. Questions the benefit of detailed policy for climate change effects that are expected in excess of the 10 year policy life time.
3. Considers market driven response to the cost of carbon in the domestic economy will initiate the desired regional response to climate change without unnecessary complication or duplication from the RPS (RPS should clearly express this).

## **Hamilton City Council**

1. Provide information on climate change that identifies considerations that territorial authorities should have regard to in planning for new development.
2. Supports identifying at-risk areas as a result of climate change.
3. Supports the inclusion of the policy directions outlined in FutureProof in regards to reducing greenhouse gas emissions.

## **New Zealand Transport Agency**

1. See related comments in 'Energy' section.
2. Key target of NZTS is to halve per capita greenhouse emissions from domestic transport by 2040 – NZTS targets need to be recognised and appropriate measures implemented throughout the region.
3. The most effective and appropriate way of achieving this is by including the objectives and targets in the RPS.
4. Strongly supports the potential approach outlined in the discussion document to seek to reduce the region's greenhouse gas emissions by lessening our reliance on fossil fuels and assisting communities to lead lower emission lifestyles – to achieve these outcomes New Zealand Transport Agency
5. Considers that the RPS should encourage the effective integration of growth management, land use and transport planning, with the aim of reducing the demand for travel and providing lower greenhouse gas emission transport alternatives.

## **EECA**

1. Supports the issues and general approaches identified in section 4.2 of the discussion document.

## **Fonterra Co-operative Group Limited**

1. Support measures designed to reduce greenhouse gas emissions, however, consider that mitigation of climate change (reducing emissions) is best approached at a national level.
2. Issues related to responding to the effects of climate change (adaptation) such as drier summers, rising sea levels etc need to be addressed at a regional level.
3. Support the identification of areas likely to be impacted by climate change in the RPS but support a national approach to methods for reducing greenhouse gas emissions and our reliance on fossil fuels.
4. Important the Environment Waikato response to possible regional climate change impacts be undertaken with consideration of the level of certainty of the timeframes and significance of the impacts.

## **Genesis Energy**

1. Provisions should only seek to be consistent with central government policy.

**Johns, W (individual)**

1. Supports undertaking environmental assessments to categorise local ecosystems in dealing with the effects of climate change.
2. Establishing a scientific baseline is essential and needs to be done before the ecosystems are too modified or lost entirely.
3. Undertaking such an assessment will help in developing objectives.

**Latitude Planning Services**

1. Expresses caution with predictions about loss of biodiversity as a result of climate change.

**Mighty River Power**

1. Views climate change as an issue for New Zealand to address as a nation rather than individual regions, as regions cannot constructively influence our global contribution by influencing the regional distribution of greenhouse gas emissions.
2. However, there are measures that the RPS could promote that would over time contribute to a reduction in greenhouse gases, i.e. efficient land use patterns and building design, integrated land use planning with transport infrastructure.

**New Zealand Forest Managers Ltd**

1. The RPS could advocate that resource consent applications for land use and development include an assessment of emissions from the proposed activity.
2. The RPS could state that priority be given to renewable energy sources such as geothermal, hydro and biofuels.

**New Zealand Fertiliser Manufacturers Research Association**

1. Supports cooperation with industry in the development of best management practices which allow flexibility and innovation to respond to climate change.

**Solid Energy New Zealand Ltd**

1. Air Plan should be used to promote or enforce the use of clean heat technologies.

**Te Kotuku Whenua & Tainui Hapu**

1. Support the need for a more proactive approach to reducing the effects of climate change.
2. Identifying areas that are not suitable for long-term development is supported.

**The Councils**

1. Climate change is an important issues and the Councils want to be involved in developing RPS policy to address this matter.

**Trustpower Limited and King Country Energy Limited**

1. RPS should promote the use and development of renewable energy to reduce the reliance on fossil fuels.

**Tatua**

1. It may be appropriate for the RPS to include policies for managing the effects of climate change, the scope should not extend to measures for emissions reduction.
2. The Emissions Trading Scheme is the appropriate mechanism for controlling emissions.

**Rotorua District Council**

1. Considers it vital that the RPS takes into account and provides direction for addressing the effects of climate change.
2. Questions whether proposed RPS structure will result in duplication given it will be referenced in most, if not all sections.
3. Notes that some of the proposed changes to the Building Act are likely to address climate change through efficiency measures.

4. Encouragement of more energy efficient lifestyles is a suitable approach, best addressed through the Regional Form & Development section.

#### **Taupo District Council**

1. Recognises the RPS can play a key role in supporting the Central Government's direction with regard to reducing greenhouses gas emissions.
2. However, the focus should be on ensuring that communities grow in a manner that can ensure ongoing transition to lower emission lifestyles.
3. Considers there is a danger in the RPS trying to become too directive, particularly when many of the forms of adaptation and mitigation are best implemented at a local level.
4. Considers the best way to achieve such change is often through local Community buy in rather than central policy direction.

#### **Waitomo District Council**

1. Urges caution regarding predictions of climate change based on inexact models.
2. Notes limitations in relation to controlling buildings with respect to Building Act.
3. Considers a more active approach will be much more efficient in the long run.

#### **Waikato District Council**

1. Supports a more proactive approach to reducing the region's contribution to climate change.
2. The RPS should identify areas likely to be impacted by the effects of climate change and areas not suitable for long-term development.

# 15 Growth and development

## **ACRE**

1. Environment Waikato must take responsibility for land use controls as provided under 2003 RMA amendments.

## **Ballance Agri-Nutrients Limited**

1. Strongly encourages the use of appropriate zoning to manage effects from potentially conflicting or sensitive activities, or adverse effects arising from inappropriate development and subdivision.

## **Brown, TW (individual)**

1. Concerned that the region's productive rural land is being subdivided for rural-residential lifestyle blocks.
2. Recommends that some rules are made to control urban sprawl.

## **Cambridge Chamber of Commerce**

1. Supports defined, well-designed compact development in conjunction with meaningful open space networks that protects and promotes identity in the urban character.
2. Accommodating growth and population should not occur at the expense of the character that distinguishes Waipa and Cambridge in particular.
3. Supports measures to interlock good urban design with territorial authority's spatial planning.
4. Considers such characteristics also support and encourage the use of public transport, walking and cycling.

## **Contact Energy Limited**

1. Clear policy direction is necessary to ensure that reverse sensitivity issues are avoided wherever possible – if they cannot be avoided the RPS needs to provide clear policy to ensure that the continued operation of existing lawfully established and complying activities is not compromised.

## **Edens, S (individual)**

1. Concerned about issues of reverse sensitivity around 'townies' shifting into the country.

## **Hamilton City Council**

1. Wants the RPS to include policy on urban design to reinforce its importance, which would give territorial authorities a stronger mandate for including urban design issues within district plans.
2. Notes that Hamilton City Council's CityScope Strategy and Vista Urban Design Guide include some potentially useful principles that could be used in the RPS.
3. Make a clear connection between declining soil quality, intensification of land use and the continued fragmentation of productive rural land.
4. Provide direction on growth and development issues to achieve an integrated and coordinated approach throughout the region.
5. An integrated approach is essential in order to avoid the risk of each territorial authority developing policies independent of one another.
6. Set both general principles and specific requirements in areas with particular growth and development issues.
7. Wants the urban and rural-residential development areas identified in FutureProof to be defined in the RPS in order to encourage more compact urban environments and minimise the loss of highly productive rural land.
8. Wants to ensure that urban limits are put in place for the FutureProof sub-region.
9. Recognise that unplanned urban development in inappropriate areas can undermine certain activity types in other areas.

10. Require that structure plans are prepared for new growth cells prior to development occurring.
11. Requests that the RPS provides a framework for average density targets and identify the urban limits within which development should occur.

### **Johns, W (individual)**

1. Protect the Waikato region as a major agricultural production area.

### **Latitude Planning Services**

1. Notes that all of the themes considered for the RPS are linked to land use.
2. Seeks clarity on how land use responses to address non-point source discharges (such as water pollution, air pollution and soil quality) will be dealt with through the RPS.
3. Wants Environment Waikato to work proactively with district councils to determine the balance between region direction and local policy choice.
4. Wants the RPS to create regionally consistent standards for activities such as earthworks, noise, vibration and electro-magnetic frequencies. District councils must be involved in regional form and development debates as it affects their development forecasts in the LTCCP and revenue streams from development contributions.

### **Mighty River Power**

1. Include provisions to ensure that future development and growth does not create – reverse sensitivity effects on existing infrastructure; and significant opportunity costs in terms of limiting access to untapped renewable energy resources.
2. Considers the policy direction within the RPS should recognise the following elements:
  - Require structure plans as part of district plan changes or resource consent applications associated with new growth areas;
  - Require that structure plans and district plans changes take into account the issues identified above;
  - Recognise that rural residential development, as well as urban development, can create significant reverse sensitivity effects and opportunity costs; and
  - Require territorial authorities to proactively manage rural residential development in a manner that avoids or mitigates significant reverse sensitivity effects and opportunity costs.
3. Considered important that the RPS explicitly recognises other important infrastructure, including Waikato Hydro System, in an equivalent manner.

### **New Zealand Transport Agency**

1. Agrees that the current RPS responds indirectly or fails to respond to issues related to growth and development, and seeks the inclusion of objectives and policies which respond to these issues.
2. Agrees that the current RPS does not readily support responses which consider the cumulative effects of growth and development.
3. Identify a number of trends with the potential for adverse effects on the transport system:
  - Increasing car ownership, leading to a tendency for businesses and homes to locate away from town centres and inner suburbs;
  - Dispersed patterns of land use which increase reliance on road travel and increase trip distances;
  - Increasing difficulty for Road Controlling Authorities to respond to increased demand for road travel due to the high cost of urban roading schemes and the adverse social and environmental impacts of road building.
4. These trends have a cumulative effect on the transport system, leading to undesirable outcomes:
  - Increased reliance on single use vehicles and increased vehicle kilometres;
  - Increased congestion leading to increased journey times;
  - Reduction in the ability to service urban areas with public transport options;

- Reduced accessibility to key amenities and services, particularly for those members of society without access to a car; ribbon development along arterial routes, leading to a reduction in the effectiveness of these routes, increased risk of crashes, and increased demand for additional infrastructure such as bypasses; and
  - Incompatible land uses and transport developments leading to reverse sensitivity issues.
5. Seeks the inclusion of objectives, policies and methods which reflect desired outcomes:
    - Increased effectiveness of transport networks, including optimising the effectiveness of existing networks;
    - More effective use of transport investments;
    - Land use planning which is integrated with transport planning in a way which creates and maintains an appropriate range of transport choices and a reduced need for travel;
    - Enabling the development of efficient public transport networks, by encouraging the concentration of growth around existing urban areas, and the use of housing densities which support public transport; and
    - Consideration of the cumulative effects of growth on transport networks, and appropriate avoidance, management or mitigation of cumulative effects, supported through developer contribution policies.
  6. Supports growth strategies and structure plans as high-level tools for the integration of land use and transport planning.
  7. Supports the inclusion in the RPS of the issues listed in section 10.6 of the draft FutureProof Strategy.
  8. Seeks promotion of the NZ Urban Design Protocol within the RPS, together with the use of urban limits and growth sequencing.
  9. Strongly supports the use of urban limits as a tool for the management of growth and development issues, where these are backed by a growth strategy.

### **EECA**

1. Include objectives and policies and direct such in district plans which encourage development and settlement patterns that:
  - Use site orientation in order to support the principles of optimum energy efficiency and solar energy gain;
  - Facilitate small-scale renewable energy generation;
  - Minimise transport requirements and
  - Provide, where possible, for alternatives to single occupancy vehicles.
2. Supports identified issues in the discussion document and recognises that high quality urban form and design increases economic competitiveness, enhances community wellbeing and protects the environment.
3. Welcomes planning provisions which ensure settlement patterns that focus development in key urban areas linked to public transport corridors and nodes and that create an integrated transport network that maximises access to energy efficient modes of transport and encourages access to a range of transport modes in particular public transport.

### **Franklin District Council**

1. Incorporate and clearly articulate:
  - integration of land use and transport, with particular attention given to the location and management of high trip-generating activities, and policy guidance given as to how this should be implemented and
  - A spatial plan for the region which guides the location and form of land use development and settlement patterns.

### **Genesis Energy**

1. Include provisions containing objectives, policies and methods which recognise and provide for nationally and regionally important infrastructure – should not be limited to roads, rail and electricity lines.

### **New Zealand Fertiliser Manufacturers Research Association**

1. Endorses the protection of high quality productive agricultural land from urban subdivision.

### **New Zealand Police**

1. Ensure that transportation networks are designed in a safe and efficient manner which will enhance public safety.

### **Solid Energy New Zealand Ltd**

1. Supports the majority of recommendations made in FutureProof – important that the outcomes are locked into the RPS.
2. Recognise the importance of the significant mineral resources and the need for these to be protected from future development and reverse sensitivity issues.
3. Provide policy direction to ensure that rural residential and urban development avoids mineral resource areas, and that conflicts between extraction and associated activities has been reduced, by ensuring sensitive activities are not located adjacent to sites where mineral resources are being extracted.
4. Development should be located and designed to avoid foreclosing future opportunities.

### **The Councils**

1. Sees no need for Environment Waikato to become involved in urban development in areas other than in the Waikato Basin where there is high growth and where growth can be predicted with a measure of certainty.
2. Supports incorporating the provisions agreed to in agreed growth strategies such as FutureProof.
3. EW should restrict itself to involvement in urban planning to towns with a population larger than 15,000.
4. Recommends that the RPS adopt Greater Welling Region's approach of 'regionally significant centres'.
5. Opposed to prescription on urban form and development except in broad terms such as 'concentrate development around existing towns'.

### **Taupo District Council**

1. RPS must support the work by territorial authorities, a number of who have already developed strategies for managing growth.
2. Territorial authorities are in a much better position to provide the direction for their communities to achieve managed growth.
3. RPS should reflect this excellent work that has already been undertaken and provide support.
4. While the development of principles in the RPS has merit we are concerned that too restrictive a focus on a compact form of development may be detrimental.
5. Communities have different values and priorities and these need to be reflected in growth management.
6. RPS should recognise that provincial towns like Taupo will have very different approaches to growth management compared to the major metropolitan area of Hamilton and its surrounds.
7. Once size does not fit all when it comes to growth management.

### **Trustpower Limited and King Country Energy Limited**

1. It is important to recognise that the development and design of hydroelectric power schemes and associated ancillary activities are restricted by the resource that they use – it is not practicable, appropriate or efficient to locate such a scheme where it cannot effectively and efficiently generate electricity, or to place inappropriate restrictions on the design of a scheme.

### **Rotorua District Council**

1. Supports growth management in terms of strategic transport network security.

2. Seeks clarification on the extent of control envisaged by the RPS.

### **Vector Limited**

1. Considers a clear and concise RPS which provides for the protection, and continued safe and efficient operation of regionally significant infrastructure is necessary to sustainably manage regionally significant physical resources.
2. Recognise and define "Regionally Significant Infrastructure".
3. Supports identification of regionally significant infrastructure and has policies which protect these from adverse effects.
4. Supports a requirement for local authorities to identify infrastructure and ensure its protection from inappropriate subdivision and land use, and to provide suitable integration between natural/physical resources and land development.
5. Does not oppose development and growth in the vicinity of gas transmission pipelines provided that the necessary safety and operational considerations are taken into account.
6. Reverse sensitivity is a key issue that will need to be recognised and provided for.
7. Agrees that the issues identified in Part 5 of the Discussion Document need managing to ensure sustainable integration between land use and infrastructure, in particular;
  - The effect development can have on the safe, efficient and effective operation of transport and other infrastructure;
  - Reverse sensitivity issues with existing infrastructure; and
  - Reduced ability to build, expand or upgrade infrastructure.
8. Supports the current objective in Section 3.13.2 of current RPS, however, suggests minor wording change
9. Considers the infrastructure owner or operator is the most appropriate party to address effects of other activities on gas pipelines (while giving effect to the code standard).

### **Waikato District Council**

1. Supports use of land use planning tools, such as growth strategies, structure plans and provide guidance about matters that should be addressed prior to new development.
2. Suggests the land use principles within FutureProof be incorporated into the RPS.
3. A principles approach (rather than a specific, prescriptive approach) would have advantage of giving individual councils the ability to implement this approach in a flexible manner best suited to their districts.

### **WEL Networks**

1. Supports the RPS Discussion Document proposed policy positions on Regional Form and Development,
2. Requests extension of proposed policy approaches could be extended to include all 'essential service infrastructure'.
3. Objectives and policies should promote "Integrated land use and infrastructure planning for essential services".
4. Such positive policies would promote planning that integrates the land use with not only transport planning, but also broader considerations of essential services such as power, water, wastewater and transport.
5. All of these services are an essential part of regional form and development.
6. Recognises FutureProof as the guiding philosophy behind planning of future urban settlement patterns in the greater Hamilton urban area, and supports the need for enabling development to occur in appropriate locations within existing urban settlements.
7. Supports encouraging "compact development, concentrated around existing areas of development".
8. Cautions that it is important to recognise that integrated land use and infrastructure planning is just as important in urban intensification areas as in greenfields sites.
9. Ad hoc urban redevelopment involving existing services and land uses can lead to costly and time-consuming infrastructure improvements for essential services if it is

not undertaken in a collaborative manner. This is particularly true for essential services where, for example, power requirements through a certain parts of a network may be at or nearing capacity.

10. Urban redevelopment that relies on capital improvements to infrastructure may require a number of years planning and design. In certain circumstances, essential service restrictions may not permit development in a particular location for some time.

#### **Waitomo District Council**

1. Care must be taken to guard against adopting region-wide policies that are designed for Hamilton City or to address Coromandel-specific issues.
2. Criteria to identify areas of rural residential development seems to be idealistic but will reap many future benefits if can be developed in a realistic fashion.

# 16 Transport and other infrastructure

## **AA**

1. RPS should be prescriptive however needs to balance economic development, transport needs and the changing environment.
2. Recognise need for strong leadership and controls on how land adjoining strategic corridors is used.
3. RPS in partnership with the RLTS should set robust policy on how land use and the region's transport needs are integrated.

## **ACRE**

1. Expects strong leadership in this area, including allowance for rail corridors and increasing rail usage.

## **Ballance Agri-Nutrients Limited**

1. Consider transport and infrastructure should be integrated with growth and development and addressed within the same section of the RPS.
2. It is vital that new land use is integrated and planned alongside transport and infrastructure to avoid unnecessary constraints on growth through lack of supporting infrastructure, and unsustainable demands being placed on infrastructure to meet new growth.

## **Hamilton City Council**

1. Supports the strategic integration of land use and infrastructure and the RPS should reinforce the importance of this principle.
2. Set both general principles for growth management throughout the region and specific requirements in areas that have particular growth and development issues.
3. Recognise key regional passenger transport links (such as the passenger rail transport service between Auckland and the Waikato region).

## **Johns, W (individual)**

1. Must be more effective in utilising land types.
2. Provide for regional transport given the shortage of sustainable fuels that will be available in the future.
3. Important to plan for the transport needs of an aging population and include infrastructure and services such as public transport and access to walkways and cycleways for senior citizens.

## **J Swap Contractors Ltd**

1. Supports the concept of locking provisions into the RPS that all road corridors serving existing quarries be deemed as Heavy Commercial Vehicle roading corridors.
2. Furthermore, these should be controlled and maintained by the Regional Council and not district councils.
3. Require property titles of all land located along such roadways be tagged to require building setbacks for new dwellings.

## **Latitude Planning Services**

1. Suggests incorporating high level policy approaches from the RLTS into the RPS, including ensuring asset optimisation and protection; focusing investment in strategic corridors (road and rail) for route capacity improvements; substantial improvement in road safety.

## **New Zealand Transport Agency**

1. Seeks a proactive and directive approach to transportation issues, transport infrastructure and the integration of transport and land use in order to help to achieve the objectives and targets of the NZTS and amended GPS as well as the purpose of the RMA.

2. Seeks that RPS helps to achieve the following outcomes, consistent with section 30(1)(gb):
  - Land use and transport are integrated to ensure that growth and development and transport infrastructure is planned and delivered together;
  - Land use planning and urban design is coordinated in a way that helps to reduce the need for new transport infrastructure;
  - Land use and development growth is planned in conjunction with all transport providers;
  - Different modes of transport are integrated to enable maximum travel choice and flexibility;
  - The state highway and arterial road networks are as safe and efficient as practicable for all road users and ultimately assist with economic growth and productivity;
  - Sustainable travel behaviour is encouraged through management of traffic growth and through an increase in the proportion of travel undertaken by foot, by cycle and/or by public transport; and
  - The transport system is financially sustainable as optimal use has been made of existing network assets.
3. Function and operation of strategic transport corridors (identified in RLTS) at the top of the regional roading hierarchy needs to be recognised and protected within the RPS
4. Map that shows a roading hierarchy, emphasising the function and operation of these corridors – then implemented through district plans requiring land use and transport functions and the interaction between them to be considered and addressed as part of the planning process.
5. Strongly supports use of RPS and district plans to protect the policies and key outcomes of the RLTS.
6. Status of Waikato Expressway (Road of National Significance) should be reflected in the RPS, with a view to protecting the safe and efficient function of this key transport investment.
7. Does not support protecting future opportunities as a matter of principle where there is no strategic justification for doing so.
8. Does not support the inclusion of specific transport projects within the RPS, unless those projects have been fully evaluated, assessed, prioritised within the RLTP and NLTP and approved for funding.
9. RPS should give statutory effect to the objectives and outcomes which come from growth strategies.
10. The importance of arterial road networks and the linkage of the region's road network to other regions and transport modes need to be provided for in the objectives, policies, and methods of the RPS.
11. Use of structure plans at the time of Greenfield development is essential for the sustainable management of existing infrastructure and the planning, timing and funding of new infrastructure.
12. Anchoring the requirement for structure plans and development contributions in the RPS is a practical way of ensuring an integrated approach to land use and transport planning.
13. Providing assessment criteria for structure plans is essential to require local authorities to consider issues such as connectivity and funding of transport networks, as well as the provision of facilities and linkages to multi-modal transport.
14. Including reverse sensitivity as an issue, and providing appropriate objectives and policies in the RPS to ensure that key transport corridors are protected, will give clear direction to district plans and other strategic documents.
15. Documents such as the RLTS and the Cycling and Walking Strategy need to be recognised in the RPS. (New Zealand Transport Agency Planning Policy Manual (2007) provides some example provisions for RPS).

## **EECA**

1. Would welcome planning provisions which ensure settlement patterns that focus development in key urban areas linked to public transport corridors and nodes and that create an integrated transport network that maximises access to energy efficient modes of transport and encourages access to a range of transport modes in particular public transport.

## **Genesis Energy**

1. Provisions should ensure that corridors are available for the transportation of over-dimension loads associated with new generation equipment, other industrial plant, or transportation of equipment for maintenance of existing infrastructure.

## **The Councils**

1. Acknowledge that transport planning requires a regional focus.
2. RPS should lock in the territorial authorities agreed long-term growth strategies where they have been developed.
3. Support the use of urban design guidelines for larger urban areas.
4. Supports the RLTS but does not want to lose the ability to negotiate with New Zealand Transport Agency on specific site access issues.

## **Taupo District Council**

1. Leadership role of Environment Waikato in transport planning is acknowledged and supported.
2. Use of regional spatial maps to identify growth areas and transport corridors of regional significance is encouraged.
3. While there may be some difficulties in making amendments to such plans as communities develop, - the idea warrants further exploration.
4. Strongly encourage the RPS provide stronger recognition to documents like growth strategies, prepared under the special consultative procedure of the Local Government Act 2002.
5. Recognise the merits of the RPS providing guidance on urban form to encourage more sustainable transport options. However, note concerns under growth and development above. Communities are all different with their own character, values and social and economic characteristics. Directing such communities to a particular type of urban form is not considered to be enabling them to provide for their

## **Rotorua District Council**

1. Management of transport and infrastructure are significant cross boundary issues.
2. Coordination between adjoining regional councils is encouraged.
3. Policies encouraging multi-modal approaches are appropriate, however, note that national direction may not support alternative transport directions as strongly as it previously did.
4. Caution should be exercised bringing non-statutory/non-RMA documents into the RPS (note short life cycle of many of these documents and potential for significant philosophical changes within the lifespan of the RPS).
5. RPS could consider identification, maintenance and protection of infrastructure from matters such as reverse sensitivity; conversely, RPS should address the effects arising from transport.
6. Closely link section to Growth and Development, Air and Energy sections.
7. Strong regional policies are required that deal with issues regionally in a manner that allows territorial councils to continue their functions.

## **WEL Networks**

1. Supports the approach outlined in the Transport and Energy sections of the discussion document to facilitate the "identification and protection of regionally significant infrastructure and strategic infrastructure corridors" (page 53) and "a more integrated approach to planning for infrastructure for energy generation and transmission" (page 44).

2. Infrastructure corridors include the concept of co-locating major infrastructure and utilities in order to minimise land requirements and potential environmental effects. This concept has been identified in the Auckland Region Policy Statement Review as a “multi-energy utility corridor” and a similar concept was adopted during the development of the Peacocks Structure Plan in Hamilton City, which WEL Networks supported.
3. Recognise the strategic importance of the Waikato Expressway project to the region, not only for its transportation outcomes, but also as an opportunity as an infrastructure corridor.
4. Central Government has confirmed that the Waikato Expressway is a Road of National Significance and has committed to completing construction of the project within the next 10 years.
5. Considers this a strategic opportunity for the region that will provide significant economic and social benefits in terms of improving transport efficiency and highway safety.
6. Considers that the project also presents a unique opportunity to utilise the Waikato Expressway as an infrastructure corridor to co-locate utilities infrastructure for the benefit of the region and the nation as a whole.
7. Ensure that the benefits of this designation are realised through the revised regional policy statement.
8. Support policies that promote the co-location of utilities within this corridor.
9. The clear designation of a strategic corridor would enable WEL Networks and other utilities providers to plan infrastructure upgrades and developments with certainty and enable early consultation with stakeholders.

#### **Waitomo District Council**

1. Notes that the current Government has moved away from the NZTS developed by the previous one and a ‘wait and see’ strategy is recommended.
2. Care should be taken not to transpose city problems onto rural urban communities and establish unrealistic parking provisions where ample parking exists for current and future development.
3. Consider it would be short-sighted to establish policies for transport infrastructure aimed at increasing use of public transport when there is a dearth of public transport in most rural areas.

# 17 Minerals

## **Aggregate and Quarry Association of New Zealand (Inc)**

1. Notes minerals essential for the development of NZ generally. Those of economic value include aggregates, precious metals, industrial minerals and coal.
2. Relevant RMA matters include providing for the extraction of minerals and managing the effects of extraction (as well as effects of other activities on extraction). Aggregate and Quarry Association membership accounts for 85% of the aggregate and allied raw materials used in NZ.
3. Applaud Environment Waikato's efforts to recognise the significance of aggregates to the region and supports recognition that aggregates are needed for the growth and development of the region, and that key issues include ability to access resource and incompatible neighbouring uses.
4. Note that cost of aggregates doubles for every 30km they have to be transported. In 2008 the consumption of aggregates per person was 11 tonnes in NZ.
5. Support specific provision of a minerals chapter in the RPS.
6. Agree that key issue is that development can compromise the ability to access and extract minerals; also that use and development of mineral resource can cause environmental effects and conflict with other values.
7. Ongoing development (particularly rural including lifestyle blocks) represents a threat to overall productivity of an area.
8. Seek to ensure there is access to high quality aggregate resources in the region by avoiding adverse reverse sensitivity effects.
9. Consider that potential for extraction and processing activities to create adverse effects and the management of this should be included within RPS, however, provisions should not be prohibitive and should enable quarrying operations to be undertaken (needs to be addressed in biodiversity, freshwater, landscape and natural character chapters).
10. Three main matters need to be addressed in RPS:
  - Recognise the values and benefits of minerals;
  - Manage the effects of the extraction of aggregates in a manner that enables the continuation and development of extraction and processing activities; and
  - Manage the location of sensitive land use activities so that these do not create reverse sensitivity effects on quarrying operations.
11. Seeks:
  - Sections 3.14.1-3 of operative RPS retained;
  - Include provision for the identification and secure access to known strategic mineral resources within the RPS;
  - Include provisions which balance the management of the adverse effects of aggregate exploration and development, with recognition of the benefits which arise from aggregate extraction.

## **Ballance Agri-Nutrients Limited**

1. Recognise and provide for the appropriate use of mineral resources while managing reverse sensitivity effects, and managing adverse effects arising from the use and development of the resources.

## **Contact Energy Limited**

1. Include clear policy direction to ensure that access to known mineral resources is not restricted by inappropriate or sensitive land use in the vicinity of the resource.

## **Genesis Energy**

1. Include provisions ensure access to the region's valuable resources is not unnecessarily precluded.

### **Hamilton City Council**

1. Supports the RPS identifying and securing access to mineral resources likely to be needed in the future.

### **J Swap Contractors Ltd**

1. Adopt the definitions of minerals and industrial minerals as defined in the Crown Minerals Act 1991 and make the distinction between minerals and industrial minerals (which includes aggregates).
2. Require that all existing quarries be placed into a new 'Industrial Mineral Extractive Zone' which would be required to be provided for in every District Plan.
3. Wants district plans to make provisions to require setbacks from the property boundary which are located along the boundaries of existing quarry sites (in future an Industrial Mineral Extractive Zone). Such provisions should be noted on the land title.
4. Require the preparation and publishing of a 'Potential Mineral Resource Location Statement' which would assist regional councils to assess the potential impact of any proposed development on the mineral resource. Notes that it is not always commercially viable to develop identified minerals or industrial minerals at every known location.

### **NZ Minerals Industry Association**

3. Concerned about Territorial Authorities who have sought to prohibit mining over large areas of their district by making the activity a prohibited activity in their district plans.
4. Notes that minerals are a more significant regional issue in the Waikato Region than they are for any other region in New Zealand.
5. Clearly distinguish between the requirement to sustainably manage mineral resources and to manage the effects of mining activities.
6. Mineral policies need to reflect that minerals are fixed in location and there is therefore minimal locational flexibility.
7. Acknowledge the regionally or nationally important mineral resources and establish policy that ensures they are available to the region's or nation's consumers. Mineral development should be allowed when it can be undertaken in a manner that reflects sustainable management principles.
8. Supports regional form and development patterns section of the discussion document but wants more information to be available on what are 'key mineral locations'.
9. Considers the current RPS policies have been insufficiently directive to constrain the exercise of territorial function so that use and development of mineral resources are properly integrated.
10. Minerals policy must safeguard sterilisation of any significant mineral resources and consider the existence and extent of mineral resources in any decision-making which may have the potential effect of sterilising those resources.
11. Requests a mineral resource assessment to be undertaken to inform mineral policies.
12. Feedback offers a number of objectives that could be included in a mineral policy.
13. Wants regional mineral policies to extend beyond managing resource use conflict for known resources.

### **Newmont Waihi Gold**

3. Supports the proposed location of 'minerals' under the theme of 'regional form and development patterns'.
4. Requests involvement in developing a more detailed map for the Proposed RPS that shows known mineral deposits and areas considered prospective for the discovery of new mineral deposits.
5. Wishes to retain the ability to address the effects of any proposed activities through the existing consenting processes of the RMA.
6. Concerned about any process that takes away, or provides a further barrier to addressing effects through consent applications.

7. Concerned about the imposition of prohibited activity status for mining in district plans which is problematic for the minerals industry.
8. Supports protecting, landscape values, significant indigenous vegetation and habitats of indigenous fauna and rare and threatened biodiversity where that protection can be justified. However, opposes the imposition of blanket protection rules or zoning that are imposed without the necessary consultation and scientific justification.
9. Places a strong focus on its social and environmental responsibilities and that the long term benefits that mining can provide in terms of environmental enhancement should not be overlooked.
10. Considers that is unnecessary and inappropriate to distinguish between different types of minerals (aggregates, industrial metals and precious metals) in the RPS, given that the effects of extracting these minerals are for the most part very similar in nature.

#### **Solid Energy New Zealand Ltd**

1. Strongly supports statement in Discussion Document that rural residential and urban development should be strongly discouraged in key mineral locations.
2. Suggests that access to and extraction of mineral resources should not be unnecessarily restricted.
3. RPS should take a long term view (at least 50 years) of the key mineral resources that are likely to be used in the future.
4. RPS should identify and protect access to current and future mineral resources by discouraging inappropriate settlement and development in these areas, including that of land use changes that may compromise access to these minerals.
5. Acknowledge the recognition in the Regional Energy Strategy of the significant role that coal resources currently play and support for development of clean coal technologies and new low-emission extraction techniques.
6. Encourage and provide for the potential development of alternative forms of coal mining and use.

#### **Te Kotuku Whenua & Tainui Hapu**

1. Retain the existing policy and remediation of existing sites, along with the ability to distinguish between different types of minerals.
2. Opposed to the identification of strategic mineral resources and securing access to them, particularly within the coastal margins, wahi tapu and wahi whakahirahira.

#### **The Councils**

1. Support current RPS approach to minerals.
2. Cautions against the RPS identifying locations of strategic minerals as it could result in land speculation.
3. Does not support mandatory buffer areas as it should be up to the developer to determine and pay for the establishment of a buffer zone.

#### **Rotorua District Council**

1. Recognise the value of securing mineral resources for future generations and its role in supporting on-going growth and development. A collaborative approach is encouraged regarding mineral extraction given the shared nature of consenting roles.

#### **Waikato-Tainui Te Kauhanganui Incorporated**

1. Retain the existing minerals provisions but provide more emphasis on the remediation of existing sites.
2. Should distinguish the difference between different types of minerals as the use and demand of these minerals varies, including the rate of extraction.

#### **Waikato District Council**

1. Notes the key approaches set out in the Future Proof Strategy signal that development should occur in a way that minimise the loss of access to important

mineral resources and that conflict between extraction activities and other activities should be reduced by effective planning.

2. Considers this approach is worth exploring further; however, an appropriate balance needs to be struck between the ability of property owners to develop their land and the need to effectively manage mineral resources for future generations.
3. Supports the identification of mineral resources, but considers the degree of protection to be afforded these resources should be determined at the district level.
4. Further work needs to be done to distinguish between different types of mineral resources and their characteristics, as differing approaches are likely to be needed for different mineral resources.

**Waitomo District Council**

1. supports policies to ensure viability of the resource.