

Proposed Bay of Plenty Regional Policy Statement  
Section 32 report  
Water quality and land use



Bay of Plenty Regional Council  
Strategic Policy Publication 2010/07  
November 2010

ISSN 1176 4112

# **Section 32 Report**

**Water Quality and Land Use**



# Contents

1	Introduction	1
1.1	Structure of this report	1
2	Regionally significant issues	5
3	Extent to which the objectives are the most appropriate	7
3.1	Objectives 27 and 28	7
3.2	Objectives 29 and 30	11
3.3	Analysis of the appropriateness of Objectives 27–30	12
4	Evaluation of policies and methods to achieve Objective 27	13
4.1	Range of policy and method options considered to achieve Objective 27	13
4.2	Evaluation as to the effectiveness and efficiency of the policy and method options to achieve Objective 27	15
4.3	Results of evaluation as to the most appropriate policy and method options to achieve objective 27	19
4.4	Risks of acting or not acting if information is uncertain or insufficient	20
5	Evaluation of policies and methods to achieve Objective 28	21
5.1	Range of policy and method options considered to achieve Objective 28	21
5.2	Evaluation as to the effectiveness and efficiency of the policy and method options to achieve Objective 28	22
5.3	Results of evaluation as to the most appropriate policy and method options to achieve objective 28	26
5.4	Risks of acting or not acting if information is uncertain or insufficient	27
6	Evaluation of policies and methods to achieve Objective 29	29
6.1	Range of policy and method options considered to achieve Objective 29	29
6.2	Evaluation as to the effectiveness and efficiency of the policy and method options to achieve Objective 29	31
6.3	Results of evaluation as to the most appropriate policy and method options to achieve objective 29	34
6.4	Risks of acting or not acting if information is uncertain or insufficient	35
7	Evaluation of policies and methods to achieve Objective 30	37
7.1	Range of policy and method options considered to achieve Objective 30	37
7.2	Evaluation as to the effectiveness and efficiency of the policy and method options to achieve Objective 30	39
7.3	Results of evaluation as to the most appropriate policy and method options to achieve objective 30	42
7.4	Risks of acting or not acting if information is uncertain or insufficient	43
	Appendix 1 – Criteria used to determine regionally significant issues	45
	Appendix 2 – References	47



# 1 Introduction

This report presents the evaluation of the Water Quality and Land Use topic of the Proposed Regional Policy Statement in accordance with section 32 of the Resource Management Act 1991. Section 32 states:

32 *Consideration of alternatives, benefits, and costs*

(1) *In achieving the purpose of this Act, before a proposed plan, proposed policy statement, change, or variation is publicly notified, a national policy statement or New Zealand coastal policy statement is notified under section 48, or a regulation is made, an evaluation must be carried out by —*

...

(c) *the local authority, for a policy statement or a plan (except for plan changes that have been requested and the request accepted under clause 25(2)(b) of Part 2 of Schedule 1); or*

(3) *An evaluation must examine —*

(a) *the extent to which each objective is the most appropriate way to achieve the purpose of this Act; and*

(b) *whether, having regard to their efficiency and effectiveness, the policies, rules, or other methods are the most appropriate for achieving the objectives.*

...

(4) *For the purposes of the examinations referred to in subsections (3) and (3A), an evaluation must take into account —*

(a) *the benefits and costs of policies, rules, or other methods; and*

(b) *the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the policies, rules, or other methods.*

(5) *The person required to carry out an evaluation under subsection (1) must prepare a report summarising the evaluation and giving reasons for that evaluation.*

(6) *The report must be available for public inspection at the same time as the document to which the report relates is publicly notified or the regulation is made.*

## 1.1 Structure of this report

Section 2 of this report outlines the identified regionally significant issues and the process of identification.

Section 3 outlines the appropriateness of Objectives 27–30 in accordance with the purpose of the Act.

Sections 4–7 then evaluate the most appropriate policy and method options to achieve each objective. When evaluating the policy and method options, the range of options available is first discussed, and then each option is evaluated. There are four types of options discussed in each instance. These are:

(a) Broad direction to district and/or regional plans

This is where a policy directs that a change is to be made to a district and/or regional plan. The method then sets out when this change is to be undertaken.

(b) Specific direction as to matters to be given effect by regional and/or district plans, to which consent authorities must have regard, and to which territorial authorities must have particular regard when making decisions on notices of requirements

The policies and methods set out when these matters are to be considered. This may include decisions about preparing, varying, changing, or otherwise altering district and/or regional plans, resource consent decisions, or decisions on notices of requirements.

(c) Guiding actions

This is where policies and methods outline actions required to help achieve the objectives of the Regional Policy Statement. These include:

- Information and guidance
- Integrating management
- Identification or investigation

(d) Doing nothing

This is where no intervention, either directive or guiding, will occur.

Determining the most appropriate policies and methods is based on an assessment of the *effectiveness* and *efficiency* of the policy and method options, and the risks of acting or not acting when there is uncertain or insufficient information.

*Effectiveness* is a measure of how successful a particular option is in achieving the objective. Effectiveness is a cumulative value, derived from the range of types and scope of influences or impacts of an intervention, towards achieving intended results and environmental outcomes. The effectiveness of an option is not able to be assessed as an absolute value. Rather, options are appraised as to whether they exhibit the qualities that contribute to effectiveness and to what degree, and a determination is made as to the cumulative effect of the pertinent attributes in terms of high, medium or low effectiveness.

When evaluating the *efficiency* of the policy and method options both the benefits (social, economic and environmental) and costs (social, economic and environmental) are discussed. Efficiency of the option is then evaluated as “Yes” (relatively efficient) or “No” (relatively inefficient). *Figure 1* outlines how this assessment was undertaken.

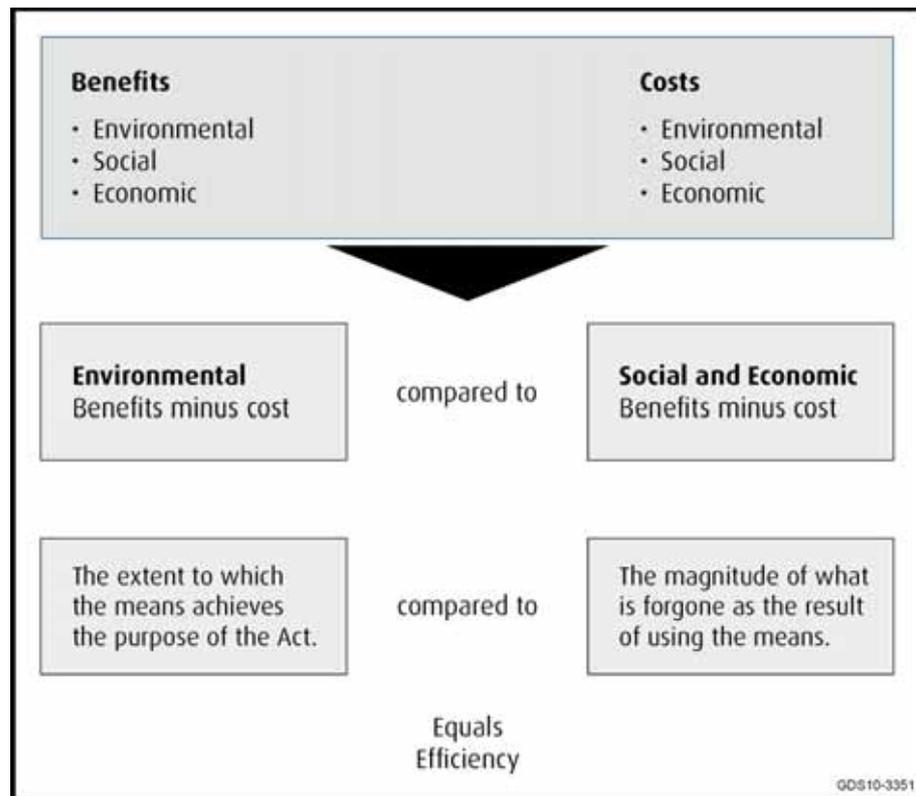


Figure 1 Deriving efficiency from benefits and costs.

The evaluation of *efficiency* will result in either a positive or negative result in terms of efficiency. Alternatively, if efficiency is expressed as a cost/benefit ratio, it will be either greater than or less than 1. In the event that the ratio is less than 1, the option can be considered efficient, in that the sum of the benefits outweigh the sum of the costs. In the event that the ratio is greater than 1, the option can be considered to be inefficient, in that the sum of the costs outweigh the sum of the benefits. It is important to note that in this evaluation of efficiency, absolute values for each of the variables considered pertinent (i.e. identified as either a cost or a benefit within the evaluation of the options) are not available. Rather, the analysis has endeavoured to present an accurate appraisal of the relative costs and benefits between the options, in order to determine which are efficient and which are not. A simple yes or no is used to differentiate the options as efficient or inefficient.



---

## 2 Regionally significant issues

---

In identifying the regionally significant issues around water quality and land use, the following information was evaluated:

- Criteria to ensure the issues were regionally significant (refer *Appendix 1* for a copy of the criteria).
- Bay Trends (2004) – Report on the state of the Bay of Plenty environment.
- Stakeholder written comments/submissions on the Draft Regional Policy Statement.
- The Next Bay of Plenty Regional Policy Statement: Issues and Options (2008).
- Monitoring and Evaluation of the Operative Bay of Plenty Regional Policy Statement (2008).

The resulting issues recommended for inclusion in the Proposed Regional Policy Statement on water quality and land use are:

**Issue 1: Decline in water quality from land use**

Some land-use and land-management practices lead to erosion and soil loss resulting in water quality degradation and accelerated accumulation of sediment in Tauranga Harbour, Ohiwa Harbour and other receiving environments.

Water quality is declining in parts of the region. Currently, the decline is being caused primarily by non-point source discharges from agricultural and urban land-use activities.

**Issue 2: Rotorua Te Arawa Lakes**

Agricultural discharges of nitrogen and phosphorus are a significant contributor to reducing water quality in the majority of the lakes of the Rotorua district.

**Issue 3: Soil health and productivity**

Land management practices and uses that are incompatible with the capability of a soil to sustain them are reducing that soil's health and life-supporting capacity.



## 3 Extent to which the objectives are the most appropriate

The proposed water quality and land use objectives are:

- Objective 27: The quality of water in the region is maintained and where necessary enhanced to meet the identified values associated with its required use and protection.
- Objective 28: Enhance the water quality in the lakes of the Rotorua district and other catchments at risk.
- Objective 29: Land use is:
- 1 within the capability of the land to support the use,
  - 2 integrated with the wider environmental values of its surroundings, and
  - 3 within the capacity of its receiving water to assimilate any discharge.
- Objective 30: The potential of the region's versatile land and rural production activities in the rural environment is sustained for future generations.

The following is an outline of the extent to which each of the objectives is the most appropriate to achieve the purpose of the Resource Management Act.

The appropriateness of the policies and methods to achieve the objectives is evaluated by looking at the effectiveness and the efficiency of the policy and method options and the risks of acting or not acting if there is uncertain or insufficient information.

### 3.1 Objectives 27 and 28

*Objective 27: The quality of water in the region is maintained and where necessary enhanced to meet the identified values associated with its required use and protection.*

*Objective 28: Enhance the water quality in the lakes of the Rotorua district and other catchments at risk.*

**Achieving the purpose of the Resource Management Act:** Objectives 27 and 28 address issues 1–3 and the purpose of the Resource Management Act by promoting

- sustaining the potential of water to meet the reasonably foreseeable needs of future generations
- safeguarding the life-supporting capacity of water, and
- avoiding, remedying, or mitigating any adverse effects on the water environment.

How the water resource is to be managed in a way, or at a rate, that enables people and communities to provide for their well-being is addressed in policies and methods.

Particular matters (within Part 2 of the Resource Management Act) of relevance include:

- 6 ..recognise and provide for the following matters of national importance:
- (a) *the preservation of the natural character of the coastal environment (including the coastal marine area), wetlands, and lakes and rivers and their margins, and the protection of them from inappropriate subdivision, use, and development;*
- ...
- (c) *the protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna;*
- ...
- (e) *the relationship of Maori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga;*
- 7 ... have particular regard to—
- (a) *kaitiakitanga;*
- (aa) *the ethic of stewardship;*
- (b) *the efficient use and development of natural and physical resource;*
- (c) *the maintenance and enhancement of amenity values;*
- (d) *intrinsic values of ecosystems;*
- (f) *maintenance and enhancement of the quality of the environment;*
- (g) *any finite characteristics of natural and physical resources;*
- (h) *the protection of the habitat of trout and salmon;*
- (i) *the effects of climate change.*
- 8 ...take into account the principles of the Treaty of Waitangi (Te Tiriti o Waitangi).

#### **Resource Management Act mandate for water quality management**

The relevant subsections of section 30, *Functions of regional councils under this Act*, of the Resource Management Act for Objectives 29 and 30 include:

- (1)(a) *the establishment, implementation and review of objectives, policies, and methods to achieve integrated management of the natural and physical resources of the region;*
- (1)(b) *the preparation of the preparation of objectives and policies in relation to any actual or potential effects of the use, development, or protection of land which are of regional significance;*
- ...
- (1)(c) *the control of the use of land for the purpose of—*
- ...
- (ii) *the maintenance and enhancement of the quality of water in water bodies and coastal water:*
- (iiia) *the maintenance and enhancement of ecosystems in water bodies and coastal water*
- ...
- (1)(f) *the control of discharges of contaminants into or onto land, air, or water and discharges of water into water:*
- (1)(fa) *if appropriate, the establishment of rules in a regional plan to allocate any of the following...*
- (iv) *the capacity of air or water to assimilate a discharge of a contaminant: the taking or use of water (other than open coastal water).*

A relevant subsection of section 31, *Functions of territorial authorities under this Act*, of the Resource Management Act for Objectives 29 and 30 is:

- (1)(b) *the control of any actual or potential effects of the use, development, or protection of land.*

Section 67(3)(b) requires that a *regional plan must give effect to any regional policy statement*. Section 68 allows that:

- (1) *A regional council may, for the purpose of—*  
 (a) *carrying out its functions under this Act (other than those described in paragraphs (a) and (b) of section 30(1)); and*  
 (b) *achieving the objectives and policies of the plan,— include rules in a regional plan.*

Section 69 relates to water quality rules and section 70 to rules about discharges:

### **69 Rules relating to water quality**

- (1) *Where a regional council—*  
 (a) *provides in a plan that certain waters are to be managed for any purpose described in respect of any of the classes specified in Schedule 3; and*  
 (b) *includes rules in the plan about the quality of water in those waters,— the rules shall require the observance of the standards specified in that schedule in respect of the appropriate class or classes unless, in the council's opinion, those standards are not adequate or appropriate in respect of those waters in which case the rules may state standards that are more stringent or specific.*
- (2) *Where a regional council provides in a plan that certain waters are to be managed for any purpose for which the classes specified in Schedule 3 are not adequate or appropriate, the council may state in the plan new classes and standards about the quality of water in those waters.*
- (3) *Subject to the need to allow for reasonable mixing of a discharged contaminant or water, a regional council shall not set standards in a plan which result, or may result, in a reduction of the quality of the water in any waters at the time of the public notification of the proposed plan unless it is consistent with the purpose of this Act to do so.*

### **70 Rules about discharges**

- (1) *Before a regional council includes in a regional plan a rule that allows as a permitted activity—*  
 (a) *a discharge of a contaminant or water into water; or*  
 (b) *a discharge of a contaminant onto or into land in circumstances which may result in that contaminant (or any other contaminant emanating as a result of natural processes from that contaminant) entering water,—*

*the regional council shall be satisfied that none of the following effects are likely to arise in the receiving waters, after reasonable mixing, as a result of the discharge of the contaminant (either by itself or in combination with the same, similar, or other contaminants):*

- (c) *the production of conspicuous oil or grease films, scums or foams, or floatable or suspended materials:*  
 (d) *any conspicuous change in the colour or visual clarity:*  
 (e) *any emission of objectionable odour:*  
 (f) *the rendering of fresh water unsuitable for consumption by farm animals:*  
 (g) *any significant adverse effects on aquatic life.*

(2) *Before a regional council includes in a regional plan a rule requiring the adoption of the best practicable option to prevent or minimise any actual or likely adverse effect on the environment of any discharge of a contaminant, the regional council shall be satisfied that, having regard to—*

- (a) *the nature of the discharge and the receiving environment; and*
- (b) *other alternatives, including a rule requiring the observance of minimum standards of quality of the environment,—*

*the inclusion of that rule in the plan is the most efficient and effective means of preventing or minimising those adverse effects on the environment.*

Section 107 relates to the granting of discharge permits and places restrictions that are similar to section 70 (relating to rules):

**107 Restriction on grant of certain discharge permits**

(1) *Except as provided in subsection (2), a consent authority shall not grant a discharge permit or a coastal permit to do something that would otherwise contravene section 15 or section 15A allowing—*

- (a) *the discharge of a contaminant or water into water; or*
- (b) *a discharge of a contaminant onto or into land in circumstances which may result in that contaminant (or any other contaminant emanating as a result of natural processes from that contaminant) entering water; or*
- (ba) *the dumping in the coastal marine area from any ship, aircraft, or offshore installation of any waste or other matter that is a contaminant,—*

*if, after reasonable mixing, the contaminant or water discharged (either by itself or in combination with the same, similar, or other contaminants or water), is likely to give rise to all or any of the following effects in the receiving waters:*

- (c) *the production of any conspicuous oil or grease films, scums or foams, or floatable or suspended materials:*
- (d) *any conspicuous change in the colour or visual clarity:*
- (e) *any emission of objectionable odour:*
- (f) *the rendering of fresh water unsuitable for consumption by farm animals:*
- (g) *any significant adverse effects on aquatic life.*

(2) *A consent authority may grant a discharge permit or a coastal permit to do something that would otherwise contravene section 15 or section 15A that may allow any of the effects described in subsection (1) if it is satisfied—*

- (a) *that exceptional circumstances justify the granting of the permit; or*
- (b) *that the discharge is of a temporary nature; or*
- (c) *that the discharge is associated with necessary maintenance work—*

*and that it is consistent with the purpose of this Act to do so.*

(3) *In addition to any other conditions imposed under this Act, a discharge permit or coastal permit may include conditions requiring the holder of the permit to undertake such works in such stages throughout the term of the permit as will ensure that upon the expiry of the permit the holder can meet the requirements of subsection (1) and of any relevant regional rules.*

### Central Government direction

A Proposed National Policy Statement for Freshwater Management (July 2008) has been prepared. Section 62(3) requires that a regional policy statement *must give effect to a national policy statement*.

## 3.2 Objectives 29 and 30

Objective 29: *Land use is:*

- 1 *within the capability of the land to support the use,*
- 2 *integrated with the wider environmental values of its surroundings, and*
- 3 *within the capacity of its receiving water to assimilate any discharge.*

Objective 30: *The potential of the region's versatile land and rural production activities in the rural environment is sustained for future generations.*

- **Achieving the purpose of the Resource Management Act:** Objectives 29 and 30 address issues 1–4 and the purpose of the Resource Management Act as set out in 3.1 above (for Objectives 27 and 28).
- **Resource Management Act mandate for water quality and land use management:** The relevant subsections of section 30 of the Resource Management Act for Objectives 29 and 30 include those set out in 3.1 above (for Objectives 27 and 28) and the following:
  - (1)(c) *the control of the use of land for the purpose of*
    - (i) *soil conservation.*

The subsection of section 31, *Functions of territorial authorities under this Act*, of the Resource Management Act that is relevant to Objectives 27 and 28 is also relevant to Objectives 29 and 30, i.e.

(1)(b) *the control of any actual or potential effects of the use, development, or protection of land.*

The relevant parts of sections 68-70 and 107 that apply to Objectives 27 and 28 as set out above are also relevant to Objectives 29 and 30.

- **Central Government direction:**

A Proposed National Policy Statement for Freshwater Management (July 2008) has been prepared. Section 62(3) requires that a regional policy statement must give effect to a national policy statement.

Given the above, Objectives 27–30 are appropriate for achieving the purpose of the Resource Management Act.

### 3.3 Analysis of the appropriateness of Objectives 27–30

Final chosen objective	Other alternatives?	Why <u>not</u> the most appropriate to achieve the Resource Management Act
Objective 27: The quality of water in the region is maintained and where necessary enhanced to meet the identified values associated with its required use and protection.	Alternative 1: No objective in the Regional Policy Statement. Water quality is left to be managed directly by the Resource Management Act and by the operative Regional Water and Land Plan.	Alternative 1 does not sufficiently recognise that water quality is a regionally significant issue, particularly in the context of the Rotorua Te Arawa Lakes.
	Alternative 2: Retain the existing objective in the Operative Regional Policy Statement which is: <i>Water quality is maintained, and where practicable enhanced, to a level sufficient to safeguard aquatic life, to sustain the potential of water resources to be used and developed to meet existing and reasonably foreseeable future needs, and to provide for the protection of aesthetic or cultural values associated with water.</i>	Alternative 2 is wordy and, in listing some values, potentially excludes others. Qualifying enhancement by the expression “where practicable” could result in enhancement being inefficiently undertaken when a water quality target has already been met.
Objective 28: Enhance the water quality in the lakes of the Rotorua district and other catchments at risk.	Alternative 1. No objective in the Regional Policy Statement.	Alternative 1 does not sufficiently recognise the degraded water quality of the Rotorua Te Arawa Lakes and other catchments at risk, which is a regionally significant issue, and the need for it to be enhanced.
Objective 29: Land use is: 1 within the capability of the land to support the use, 2 integrated with the wider environmental values of its surroundings, and 3 within the capacity of its receiving water to assimilate any discharge.	Alternative 1: No objective in the Regional Policy Statement.	Alternative 1 would not provide direction to regional and district plans to manage land use to achieve long-term alignment of use with wider constraints.
	Alternative 2: Retain the existing objective in the Operative Regional Policy Statement which is: <i>The adoption of sustainable land use and management practices.</i>	Alternative 2 does not provide sufficient detail as to what considerations contribute to “sustainable” use.
Objective 30: The potential of the region’s versatile land and rural production activities in the rural environment is sustained for future generations.	Alternative 1: No objective in the Regional Policy Statement. Alternative 2: Retain the existing objective in the Operative Regional Policy Statement which is: <i>The potential of versatile soils and rural production activities in the rural environment is sustained for future generations.</i>	Alternative 1 would not provide direction to regional and district plans to protect land to safeguard the life-supporting capacity of soil and the functioning of rural activities that contribute to economic well-being. Alternative 2 is located in chapter 17A of the operative RPS and, as such, applies only in the western Bay of Plenty. Use of the term “soils” (rather than “land”) does not align with the research on which its definition is based.

Given the above, Objectives 27–30 are the most appropriate for achieving the purpose of the Resource Management Act.

---

## 4 Evaluation of policies and methods to achieve Objective 27

---

Objective 27: The quality of water in the region is maintained and where necessary enhanced to meet the identified values associated with its required use and protection.

The appropriateness of the policies and methods to achieve Objective 27 is evaluated by looking at the effectiveness and the efficiency of the policy and method options and the risks of acting or not acting if there is uncertain or insufficient information.

### 4.1 Range of policy and method options considered to achieve Objective 27

The focus of this section is to determine whether Objective 27 can be best achieved through broad direction to plans, through specific direction to plans and on matters to which regard is to be had when considering resource consent applications, by providing guidance, or by doing nothing.

This is an assessment of policy options to achieve Objective 27 over and above the alternatives assessed in relation to and presented within the Section 32 reports relating to Matters of National Importance, Iwi Resource Management, Integrated Resource Management, Natural Hazards, and Urban Form and Growth Management. This evaluation should therefore be considered in conjunction with those other Section 32 reports as they contain further information pertinent to addressing the regionally significant resource management issues concerning water quality.

#### 4.1.1 Broad direction

##### Option 1: Broad direction to district and/or regional plans

Allow the existing Regional Water and Land Plan provisions to remain unchanged.

#### 4.1.2 Specific direction

##### Option 2: Specific direction to be given effect in regional and district plans and which consent authorities must have regard to.

Provide a suite of policies and methods requiring plan changes that would establish rules that accord with the Resource Management Act's regime for achieving water quality.

#### 4.1.3 Guidance

##### Option 3: Guidance

Provide policy tools and allow discretion as to whether they are implemented.

#### **4.1.4            Doing nothing**

##### **Option 4: Doing nothing**

Provide no Resource Management Act intervention for the management of water quality.

## 4.2 Evaluation as to the effectiveness and efficiency of the policy and method options to achieve Objective 27

Selected option	Analysis of effectiveness	Effectiveness rating	BENEFITS (social, economic and environmental)	COSTS (social, economic and environmental)	Efficient ?
<b>Direction to regional and/or district plans</b>					
<p><b>Option 1</b> Allow the existing Regional Water and Land Plan provisions to remain unchanged.</p>	<p>Provides certainty as to how the regional council will manage water quality. Continues an established framework across the region.</p> <p>For Rotorua Te Arawa lakes and other at-risk catchments, the regional council can not be satisfied that none of the section 70 effects are likely to arise in the receiving waters if nutrient discharges are capped at existing levels.</p> <p>Relies on voluntary initiatives and other interventions to achieve the necessary reductions in nutrient discharges. In the time that has elapsed since this approach was adopted, reductions have been insufficient to support confidence that targets will be achieved.</p> <p>Allows for innovative approaches.</p>	<p>Medium</p>	<p><u>Social:</u></p> <ul style="list-style-type: none"> <li>▪ Allows current land use to continue at existing levels, avoiding disruption to established communities, providing certainty.</li> <li>▪ Provides consistency in the way water is managed.</li> <li>▪ Provides transparency as to what is required and the reasons for this.</li> </ul> <p><u>Economic:</u></p> <ul style="list-style-type: none"> <li>▪ Existing economically productive land use may continue.</li> </ul> <p><u>Environmental:</u></p> <ul style="list-style-type: none"> <li>▪ Caps contamination at a known level.</li> <li>▪ Discharges can be assessed and monitored.</li> </ul>	<p><u>Social:</u></p> <ul style="list-style-type: none"> <li>▪ Cultural, recreational and amenity values associated with surface water continue to be compromised by degraded water quality.</li> <li>▪ Requires voluntary reduction of authorised contaminant discharges.</li> </ul> <p><u>Economic:</u></p> <ul style="list-style-type: none"> <li>▪ Foregone opportunities for undeveloped land to be developed.</li> <li>▪ In the long term, land use may not be optimally aligned with land use capability, limiting production.</li> </ul> <p><u>Environmental:</u></p> <ul style="list-style-type: none"> <li>▪ Excessive contaminant discharges are likely to extend into the future with no certainty that targets will be achieved, resulting in section 70 effects, i.e.:                             <ul style="list-style-type: none"> <li>(c) <i>the production of conspicuous oil or grease films, scums or foams, or floatable or suspended materials:</i></li> <li>(d) <i>conspicuous change in the colour or visual clarity:</i></li> <li>(e) <i>emission of objectionable odour:</i></li> </ul> </li> </ul>	<p>No</p>

Selected option	Analysis of effectiveness	Effectiveness rating	BENEFITS (social, economic and environmental)	COSTS (social, economic and environmental)	Efficient ?
				<p>(f) the rendering of fresh water unsuitable for consumption by farm animals:</p> <p>(g) significant adverse effects on aquatic life.</p>	
<b>Specific direction to be given effect in regional and district plans and which consent authorities must have regard to</b>					
<p><b>Option 2</b> Provide a suite of policies and methods requiring plan changes that would establish rules that accord with the Resource Management Act's regime for achieving water quality.</p>	<p>Increases certainty as to how the region will manage water quality. Provides a framework for focusing on at-risk catchments across the region as a priority. Provides interim direction prior to changes being made to the Regional Water and Land Plan. Requires that nutrient discharges be authorised only if the regional council can be satisfied that none of the section 70 effects are likely to arise. Requires district planning to guide land use towards sustainability. Allows for innovative approaches.</p>	High	<p><u>Social:</u></p> <ul style="list-style-type: none"> <li>▪ Establishes clear intent of regulatory intervention.</li> <li>▪ Allowing several years before excessive discharges are reduced reduces social disruption.</li> <li>▪ Immediate benefit in matters advocated in resource consent processes.</li> <li>▪ Provides greater clarity and certainty to the applicant and consent authority about the matters to which regard is to be had when managing water quality.</li> <li>▪ Provides an opportunity for the inequities of the existing regime to be addressed.</li> </ul> <p><u>Economic:</u></p> <ul style="list-style-type: none"> <li>▪ Leads to increased economic stability because of the certainty of future contaminant discharge allowances.</li> <li>▪ Allows tourism and other sectors relying on a clean environment to continue and develop.</li> </ul>	<p><u>Social:</u></p> <ul style="list-style-type: none"> <li>▪ Contaminant discharging sectors will be subject to significant change.</li> </ul> <p><u>Economic:</u></p> <ul style="list-style-type: none"> <li>▪ Sectors able to operate with reduced contaminant discharges may generate less economic return than those with excessive discharges.</li> </ul> <p><u>Environmental:</u></p> <ul style="list-style-type: none"> <li>▪ Delay in contaminant discharge targets being required to be met will result in delays in water quality being achieved.</li> </ul>	Yes

Selected option	Analysis of effectiveness	Effectiveness rating	BENEFITS (social, economic and environmental)	COSTS (social, economic and environmental)	Efficient ?
			<u>Environmental:</u> <ul style="list-style-type: none"> <li>▪ Avoiding the section 70 effects enhances the quality of the environment.</li> <li>▪ Safeguards the life-supporting capacity of water and aquatic ecosystems.</li> </ul>		
<b>Guidance</b>					
<b>Option 3</b> Provide policy tools and allow discretion as to whether they are implemented.	For Rotorua Te Arawa lakes and other at-risk catchments, regional council can not be satisfied that none of the section 70 effects are likely to arise in the receiving waters if nutrient discharges are capped at existing levels. Providing information can guide individuals in their resource management decisions but without addressing cumulative effects. Provides freedom and ownership to the individual and/or community. Allows for innovative approaches. Provides information to the community.	Low	<u>Social:</u> <ul style="list-style-type: none"> <li>▪ Improved water management if the information is acted upon.</li> <li>▪ Provides flexibility and opportunity to develop other water management initiatives.</li> </ul> <u>Economic:</u> <ul style="list-style-type: none"> <li>▪ Avoids costs associated with regulatory response.</li> <li>▪ Reduces costs to applicant and community.</li> </ul> <u>Environmental:</u> <ul style="list-style-type: none"> <li>▪ Ensures reliable and accessible amount of water is available.</li> <li>▪ Allows adaptation to changing environmental circumstances.</li> </ul>	<u>Social:</u> <ul style="list-style-type: none"> <li>▪ Information is not considered.</li> <li>▪ Nobody takes ownership.</li> <li>▪ Defaulting directly to the Resource Management Act instead of having a locally promulgated plan rule framework diminishes respect for local democracy.</li> </ul> <u>Economic:</u> <ul style="list-style-type: none"> <li>▪ Costs to applicant and community for monitoring and research.</li> </ul> <u>Environmental:</u> <ul style="list-style-type: none"> <li>▪ Excessive contaminant discharges are likely to extend into the future with no certainty that targets will be achieved, resulting in section 70 effects.</li> </ul>	No
<b>Doing nothing</b>					
<b>Option 4</b> Provide no Resource Management Act intervention for the management of water quality.	Uncertainty that responsibility will be taken. Uncertainty that the objective or issues will be addressed. For Rotorua Te Arawa lakes and other at-risk catchments, regional council can not be satisfied that none of the section 70 effects are likely to arise in the receiving waters if nutrient discharges are capped at existing levels.	Low	<u>Social:</u> <ul style="list-style-type: none"> <li>▪ Develops an alternative approach.</li> <li>▪ Provides flexibility and opportunity to develop other water management initiatives.</li> </ul>	<u>Social:</u> <ul style="list-style-type: none"> <li>▪ Nobody takes responsibility and no action is undertaken.</li> <li>▪ Respect for the law is undermined.</li> </ul>	No

Selected option	Analysis of effectiveness	Effectiveness rating	BENEFITS (social, economic and environmental)	COSTS (social, economic and environmental)	Efficient ?
	<p>Relies on voluntary initiatives and other interventions to achieve the necessary reductions in nutrient discharges. In the time that has elapsed since this approach was adopted, reductions have been insufficient to support confidence that targets will be achieved.</p> <p>Does not meet the Resource Management Act's requirements for discharges to be authorised by a rule or a resource consent.</p> <p>Allows for innovative approaches.</p>		<p><u>Economic:</u></p> <ul style="list-style-type: none"> <li>▪ Avoids compliance and consent costs associated with implementing the policies and/or methods.</li> </ul> <p><u>Environmental</u></p> <ul style="list-style-type: none"> <li>▪ Allows adaptation to changing environmental circumstances.</li> </ul>	<p><u>Economic:</u></p> <ul style="list-style-type: none"> <li>▪ Council taken to court for no action under the RMA.</li> <li>▪ The issues continue and result in reduced economic opportunities.</li> </ul> <p><u>Environmental:</u></p> <ul style="list-style-type: none"> <li>▪ Degrades aquatic ecosystem health.</li> <li>▪ Excessive contaminant discharges are likely to extend into the future with no certainty that targets will be achieved, resulting in section 70 effects.</li> </ul>	

### 4.3 Results of evaluation as to the most appropriate policy and method options to achieve objective 27

Policy and method options	Factors contributing to effectiveness <sup>1</sup>	Efficient?	Selected (most appropriate) option(s)(tick or cross)	Proposed policies and methods
<b>Direction to regional and/or district plans</b>				
<b>Option 1</b> Allow the existing Regional Water and Land Plan provisions to remain unchanged.	Medium	No	X	
<b>Specific direction to be given effect in regional and district plans and which consent authorities must have regard to</b>				
<b>Option 2</b> Provide a suite of policies and methods requiring plan changes that would establish rules that accord with the Resource Management Act's regime for achieving water quality.	High	Yes	✓	Policies WL 1B, WL 2B, WL 3B, WL 4B, WL 5B, WL 6B & WL 7B  Methods 2, 3, 22, 28, 36
<b>Guidance</b>				
<b>Option 3</b> Provide policy tools and allow discretion as to whether they are implemented.	Low	No	X	Policies WL 1B & WL 7B  Methods 3, 36
<b>Doing nothing</b>				
<b>Option 4</b> Provide no Resource Management Act intervention for the management of water quality.	Low	No	X	

#### 4.3.1 Discussion on selected options

Having regard to the efficiency and effectiveness of the options, the specifically directive option is appropriate to achieve Objective 27 and therefore deal with the regionally significant issues related to water quality and land use.

Option 2 directs changes to plans to require regulatory intervention to improve at-risk catchments. Provided that implementation of this option includes compliance monitoring and enforcement, it will be effective in achieving its targets. While there may be significant costs to some sectors, the overall benefits of environmental quality will flow through into cultural benefits and economic benefits to other sectors.

#### 4.3.2 Options not selected

Option 1 would provide broad direction largely by allowing the existing Regional Water and Land Plan provisions to continue. The main cost implication is that environmental targets may not be achieved, resulting in continuing social and cultural costs, and uncertainty.

<sup>1</sup> Effectiveness becomes the net value of an assessment of the relative difference between options in terms of their ability to influence or deliver intended outcomes, i.e. whether they have great or widespread effect versus being of marginal or limited effect.

Option 3 is unlikely to be effective, as shown by recent history. The costs to individuals in voluntarily acting without the confidence that in aggregate the action will be effective is likely to result in little or no action being taken.

Option 4 is assessed as both ineffective and inefficient. Doing nothing is likely to result in unsustainable, unfair and inefficient degradation of water quality, and lasting social and cultural offence, and economic loss.

#### **4.4 Risks of acting or not acting if information is uncertain or insufficient**

The link between land use and water quality is well understood qualitatively but relies on assumptions and modelling at a quantitative level.

##### **4.4.1 Risks of acting**

Specific numeric targets are the basis for rules. Such targets are established on the advice of specialists informed by years of monitoring, research and modelling. Despite the uncertainty inherent in the data underlying this approach, the understanding derived from the analysis is sufficient to support action. The risk of acting in this situation is that, in time, better data may show that the action taken has been insufficient, resulting in delayed achievement of the target. Alternatively, the action may result in overshooting the target and wasted opportunity. Regularly reviewing the objective and targets, revising them as necessary, provides a sufficiently responsive policy framework to justify proceeding.

##### **4.4.2 Risks of not acting**

If no action is taken until sufficient information is available to remove uncertainty, the risk is that environmental quality will continue to deteriorate, investment uncertainty will continue and opportunities will be lost. Community morale will suffer in that people will feel unable to collectively act effectively to enhance degraded environmental resources.

## **5 Evaluation of policies and methods to achieve Objective 28**

---

Objective 28: Enhance the water quality in the lakes of the Rotorua district and other catchments at risk.

The appropriateness of the policies and methods to achieve Objective 28 is evaluated by looking at the effectiveness and the efficiency of the policy and method options and the risks of acting or not acting if there is uncertain or insufficient information.

### **5.1 Range of policy and method options considered to achieve Objective 28**

The focus of this section is to determine whether Objective 28 can be best achieved through broad direction to plans, through specific direction to plans and on matters to which regard is to be had when considering resource consent applications, by providing guidance, or by doing nothing.

This is an assessment of policy options to achieve Objective 28 over and above the alternatives assessed in relation to and presented within the Section 32 reports relating to Matters of National Importance, Iwi Resource Management, Integrated Resource Management, Natural Hazards, and Urban Form and Growth Management. This evaluation should therefore be considered in conjunction with those other Section 32 reports as they contain further information pertinent to addressing the regionally significant resource management issues concerning water quality.

#### **5.1.1 Broad direction**

##### **Option 1: Broad direction to district and/or regional plans**

Allow the existing Regional Water and Land Plan provisions to remain unchanged.

#### **5.1.2 Specific direction**

##### **Option 2: Specific direction to be given effect in regional and district plans and which consent authorities must have regard to**

Provide a suite of policies and methods requiring plan changes that would establish rules that accord with the Resource Management Act's regime for achieving water quality.

#### **5.1.3 Guidance**

##### **Option 3: Guidance**

Provide policy tools and allow discretion as to whether they are implemented.

#### **5.1.4 Doing nothing**

##### **Option 4: Doing nothing**

Provide no Resource Management Act intervention for the management of water quality..

## 5.2 Evaluation as to the effectiveness and efficiency of the policy and method options to achieve Objective 28

Selected option	Analysis of effectiveness	Effectiveness rating	BENEFITS (social, economic and environmental)	COSTS (social, economic and environmental)	Efficient?
<b>Direction to regional and/or district plans</b>					
<p><b>Option 1</b> Broad direction to district and/or regional plans</p>	<p>Provides certainty as to how the regional council will manage water quality. Continues an established framework across the region.</p> <p>For Rotorua Te Arawa lakes and other at-risk catchments, the regional council can not be satisfied that none of the section 70 effects are likely to arise in the receiving waters if nutrient discharges are capped at existing levels.</p> <p>Relies on voluntary initiatives and other interventions to achieve the necessary reductions in nutrient discharges. In the time that has elapsed since this approach was adopted, reductions have been insufficient to support confidence that targets will be achieved.</p> <p>Allows for innovative approaches.</p>	<p>Medium</p>	<p><u>Social:</u></p> <ul style="list-style-type: none"> <li>▪ Allows current land use to continue at existing levels, avoiding disruption to established communities, providing certainty.</li> <li>▪ Provides consistency in the way water is managed.</li> <li>▪ Provides transparency as to what is required and the reasons for this.</li> </ul> <p><u>Economic:</u></p> <ul style="list-style-type: none"> <li>▪ Existing economically productive land use may continue.</li> </ul> <p><u>Environmental:</u></p> <ul style="list-style-type: none"> <li>▪ Caps contamination at a known level.</li> <li>▪ Discharges can be assessed and monitored.</li> </ul>	<p><u>Social:</u></p> <ul style="list-style-type: none"> <li>▪ Cultural, recreational and amenity values associated with surface water continue to be compromised by degraded water quality.</li> <li>▪ Requires voluntary reduction of authorised contaminant discharges.</li> </ul> <p><u>Economic:</u></p> <ul style="list-style-type: none"> <li>▪ Foregone opportunities for undeveloped land to be developed.</li> <li>▪ In the long term, land use may not be optimally aligned with land use capability, limiting production.</li> </ul> <p><u>Environmental:</u></p> <ul style="list-style-type: none"> <li>▪ Excessive contaminant discharges are likely to extend into the future with no certainty that targets will be achieved, resulting in section 70 effects, i.e.:                             <ul style="list-style-type: none"> <li>(c) <i>the production of conspicuous oil or grease films, scums or foams, or floatable or suspended materials:</i></li> <li>(d) <i>conspicuous change in the colour or visual clarity:</i></li> <li>(e) <i>emission of objectionable odour:</i></li> </ul> </li> </ul>	<p>No</p>

Selected option	Analysis of effectiveness	Effectiveness rating	BENEFITS (social, economic and environmental)	COSTS (social, economic and environmental)	Efficient?
				<p>(f) <i>the rendering of fresh water unsuitable for consumption by farm animals:</i></p> <p>(g) <i>significant adverse effects on aquatic life.</i></p>	
<b>Specific direction to be given effect in regional and district plans and which consent authorities must have regard to</b>					
<p><b>Option 2</b> Provide a suite of policies and methods requiring plan changes that would establish rules that accord with the Resource Management Act's regime for achieving water quality.</p>	<p>Increases certainty as to how the region will manage water quality. Provides a framework for focusing on at-risk catchments across the region as a priority. Provides interim direction prior to changes being made to the Regional Water and Land Plan. Requires that nutrient discharges be authorised only if the regional council can be satisfied that none of the section 70 effects are likely to arise. Requires district planning to guide land use towards sustainability. Allows for innovative approaches.</p>	High	<p><u>Social:</u></p> <ul style="list-style-type: none"> <li>▪ Establishes clear intent of regulatory intervention.</li> <li>▪ Allowing several years before excessive discharges are reduced reduces social disruption.</li> <li>▪ Immediate benefit in matters advocated in resource consent processes.</li> <li>▪ Provides greater clarity and certainty to the applicant and consent authority about the matters to which regard is to be had when managing water quality.</li> <li>▪ Provides an opportunity for the inequities of the existing regime to be addressed.</li> </ul> <p><u>Economic:</u></p> <ul style="list-style-type: none"> <li>▪ Leads to increased economic stability because of the certainty of future contaminant discharge allowances.</li> <li>▪ Allows tourism and other sectors relying on a clean environment to continue and develop.</li> </ul>	<p><u>Social:</u></p> <ul style="list-style-type: none"> <li>▪ Contaminant discharging sectors will be subject to significant change.</li> </ul> <p><u>Economic:</u></p> <ul style="list-style-type: none"> <li>▪ Sectors able to operate with reduced contaminant discharges may generate less economic return than those with excessive discharges.</li> </ul> <p><u>Environmental:</u></p> <ul style="list-style-type: none"> <li>▪ Delay in contaminant discharge targets being required to be met will result in delays in water quality being achieved.</li> </ul>	Yes

Selected option	Analysis of effectiveness	Effectiveness rating	BENEFITS (social, economic and environmental)	COSTS (social, economic and environmental)	Efficient?
			<u>Environmental:</u> <ul style="list-style-type: none"> <li>▪ Avoiding the section 70 effects enhances the quality of the environment.</li> <li>▪ Safeguards the life-supporting capacity of water and aquatic ecosystems.</li> </ul>		
<b>Guidance</b>					
<b>Option 3</b> Provide policy tools and allow discretion as to whether they are implemented.	For Rotorua Te Arawa lakes and other at-risk catchments, regional council can not be satisfied that none of the section 70 effects are likely to arise in the receiving waters if nutrient discharges are capped at existing levels. Providing information can guide individuals in their resource management decisions but without addressing cumulative effects. Provides freedom and ownership to the individual and/or community. Allows for innovative approaches. Provides information to the community.	Low	<u>Social:</u> <ul style="list-style-type: none"> <li>▪ Improved water management if the information is acted upon.</li> <li>▪ Provides flexibility and opportunity to develop other water management initiatives.</li> </ul> <u>Economic:</u> <ul style="list-style-type: none"> <li>▪ Avoids costs associated with regulatory response.</li> <li>▪ Reduces costs to applicant and community.</li> </ul> <u>Environmental:</u> <ul style="list-style-type: none"> <li>▪ Ensures reliable and accessible amount of water is available.</li> <li>▪ Allows adaptation to changing environmental circumstances.</li> </ul>	<u>Social:</u> <ul style="list-style-type: none"> <li>▪ Information is not considered.</li> <li>▪ Nobody takes ownership.</li> <li>▪ Defaulting directly to the Resource Management Act instead of having a locally promulgated plan rule framework diminishes respect for local democracy.</li> </ul> <u>Economic:</u> <ul style="list-style-type: none"> <li>▪ Costs to applicant and community for monitoring and research.</li> </ul> <u>Environmental:</u> <ul style="list-style-type: none"> <li>▪ Excessive contaminant discharges are likely to extend into the future with no certainty that targets will be achieved, resulting in section 70 effects.</li> </ul>	No
<b>Doing nothing</b>					
<b>Option 4</b> Provide no Resource Management Act intervention for the management of water quality.	Uncertainty that responsibility will be taken. Uncertainty that the objective or issues will be addressed. For Rotorua Te Arawa lakes and other at-risk catchments, regional council can not be satisfied that none of the section 70 effects are likely to arise in the receiving waters if nutrient discharges are capped at existing levels.	Low	<u>Social:</u> <ul style="list-style-type: none"> <li>▪ Develops an alternative approach.</li> <li>▪ Provides flexibility and opportunity to develop other water management initiatives.</li> </ul> <u>Economic:</u> <ul style="list-style-type: none"> <li>▪ Avoids compliance and consent costs associated with implementing the policies and/or methods.</li> </ul>	<u>Social:</u> <ul style="list-style-type: none"> <li>▪ Nobody takes responsibility and no action is undertaken.</li> <li>▪ Respect for the law is undermined.</li> </ul> <u>Economic:</u> <ul style="list-style-type: none"> <li>▪ Council taken to court for no action under the RMA.</li> <li>▪ The issues continue and result in reduced economic opportunities.</li> </ul>	No

Selected option	Analysis of effectiveness	Effectiveness rating	BENEFITS (social, economic and environmental)	COSTS (social, economic and environmental)	Efficient?
	<p>Relies on voluntary initiatives and other interventions to achieve the necessary reductions in nutrient discharges. In the time that has elapsed since this approach was adopted, reductions have been insufficient to support confidence that targets will be achieved.</p> <p>Does not meet the Resource Management Act's requirements for discharges to be authorised by a rule or a resource consent.</p> <p>Allows for innovative approaches.</p>		<p><u>Environmental</u></p> <ul style="list-style-type: none"> <li>▪ Allows adaptation to changing environmental circumstances.</li> </ul>	<p><u>Environmental:</u></p> <ul style="list-style-type: none"> <li>▪ Degrades aquatic ecosystem health.</li> <li>▪ Excessive contaminant discharges are likely to extend into the future with no certainty that targets will be achieved, resulting in section 70 effects.</li> </ul>	

## 5.3 Results of evaluation as to the most appropriate policy and method options to achieve objective 28

Policy and method options	Factors contributing to effectiveness <sup>2</sup>	Efficient?	Selected (most appropriate) option(s) (tick or cross)	Proposed policies and methods
<b>Direction to regional and/or district plans</b>				
<b>Option 1</b> Allow the existing Regional Water and Land Plan provisions to remain unchanged.	Medium	No	X	
<b>Specific direction to be given effect in regional and district plans and which consent authorities must have regard to</b>				
<b>Option 2</b> Provide a suite of policies and methods requiring plan changes that would establish rules that accord with the Resource Management Act's regime for achieving water quality.	High	Yes	✓	Policies WL 1B, WL 2B, WL 3B, WL 4B, WL 5B, WL 6B, WL 7B, & WL 8B  Methods 2, 3, 22, 28, 36
<b>Guidance</b>				
<b>Option 3</b> Provide policy tools and allow discretion as to whether they are implemented.	Low	No	X	Policies WL 1B & WL 7B  Methods 3, 36
<b>Doing nothing</b>				
<b>Option 4</b> Provide no Resource Management Act intervention for the management of water quality.	Low	No	X	

### 5.3.1 Discussion on selected options

Having regard to the efficiency and effectiveness of the options, the specifically directive option is appropriate to achieve objective 28 and therefore deal with the regionally significant issues related to water quality and land use.

Option 2 directs changes to plans to require regulatory intervention to improve at-risk catchments. Provided that implementation of this option includes compliance monitoring and enforcement, it will be effective in achieving its targets. While there may be significant costs to some sectors, the overall benefits of environmental quality will flow through into cultural benefits and economic benefits to other sectors.

### 5.3.2 Options not selected

**Option 1** provides broad direction largely by allowing the existing Regional Water and Land Plan provisions to continue. The main cost implication is that environmental targets may not be achieved, resulting in continuing social and cultural costs, and uncertainty. Long term, land use may not be aligned with land use capability.

<sup>2</sup> Effectiveness becomes the net value of an assessment of the relative difference between options in terms of their ability to influence or deliver intended outcomes, i.e. whether they have great or widespread effect versus being of marginal or limited effect.

**Option 3** is unlikely to be effective, as shown by recent history. The costs to individuals in voluntarily acting without the confidence that in aggregate the action will be effective is likely to result in little or no action being taken.

**Option 4** is assessed as both ineffective and inefficient. Doing nothing is likely to result in unsustainable, unfair and inefficient degradation of water quality, and lasting social and cultural offence, and economic loss.

## **5.4 Risks of acting or not acting if information is uncertain or insufficient**

The link between land use and water quality is well understood qualitatively but relies on assumptions and modelling at a quantitative level.

### **5.4.1 Risks of acting**

Specific numeric targets are the basis for rules. Such targets are established on the advice of specialists informed by years of monitoring, research and modelling. Despite the uncertainty inherent in the data underlying this approach, the understanding derived from the analysis is sufficient to support action. The risk of acting in this situation is that, in time, better data may show that the action taken has been insufficient, resulting in delayed achievement of the target. Alternatively, the action may result in overshooting the target and wasted opportunity. Regularly reviewing the objective and targets, revising them as necessary, provides a sufficiently responsive policy framework to justify proceeding.

### **5.4.2 Risks of not acting**

If no action is taken until sufficient information is available to remove uncertainty, the risk is that environmental quality will continue to deteriorate, investment uncertainty will continue and opportunities will be lost. Community morale will suffer in that people will feel unable to collectively act effectively to enhance degraded environmental resources.



---

## 6 Evaluation of policies and methods to achieve Objective 29

---

- Objective 29: Land use is:
- 1 within the capability of the land to support the use,
  - 2 integrated with the wider environmental values of its surroundings, and
  - 3 within the capacity of its receiving water to assimilate any discharge.

The appropriateness of the policies and methods to achieve Objective 29 is evaluated by looking at the effectiveness and the efficiency of the policy and method options and the risks of acting or not acting if there is uncertain or insufficient information.

### 6.1 Range of policy and method options considered to achieve Objective 29

The focus of this section is to determine whether Objective 29 can be best achieved through broad direction to plans, through specific direction to plans and on matters to which regard is to be had when considering resource consent applications, by providing guidance, or by doing nothing.

This is an assessment of policy options to achieve Objective 29 over and above the alternatives assessed in relation to and presented within the Section 32 reports relating to Matters of National Importance, Iwi Resource Management, Integrated Resource Management, Natural Hazards, and Urban Form and Growth Management. This evaluation should therefore be considered in conjunction with those other Section 32 reports as they contain further information pertinent to addressing the regionally significant resource management issues concerning water quality and land use.

#### 6.1.1 Broad direction

##### Option 1: Broad direction to district and/or regional plans

Allow the existing Regional Water and Land Plan provisions to remain unchanged.

#### 6.1.2 Specific direction

##### Option 2: Specific direction to be given effect in regional and district plans and which consent authorities must have regard to

Provide a suite of policies and methods requiring plan changes that would establish rules that accord with the Resource Management Act's regime for sustainable land use.

#### 6.1.3 Guidance

##### Option 3: Guidance

Provide policy tools and allow discretion as to whether they are implemented.

## **6.1.4            Doing nothing**

### **Option 4: Doing nothing**

Provide no Resource Management Act intervention for the management of land use.

## 6.2 Evaluation as to the effectiveness and efficiency of the policy and method options to achieve Objective 29

Selected option	Analysis of effectiveness	Effectiveness rating	BENEFITS (social, economic and environmental)	COSTS (social, economic and environmental)	Efficient?
<b>Direction to regional and/or district plans</b>					
<b>Option 1</b> Allow the existing Regional Water and Land Plan provisions to remain unchanged.	Provides certainty as to how the regional council will manage land use. Continues an established framework across the region. Allows for innovative approaches.	Medium	<u>Social:</u> <ul style="list-style-type: none"> <li>Allows current land use to continue at existing levels, avoiding disruption to established communities, providing certainty.</li> <li>Provides consistency in the way land use is managed.</li> <li>Provides transparency as to what is required and the reasons for this.</li> </ul> <u>Economic:</u> <ul style="list-style-type: none"> <li>Existing economically productive land use may continue.</li> </ul> <u>Environmental:</u> <ul style="list-style-type: none"> <li>Safeguards the life-supporting capacity of land and soil ecosystems.</li> </ul>	<u>Social:</u> <ul style="list-style-type: none"> <li>Cultural, recreational and amenity values associated with surface water continue to be compromised by degraded water quality.</li> <li>Requires voluntary reduction of authorised contaminant discharges.</li> </ul> <u>Economic:</u> <ul style="list-style-type: none"> <li>Foregone opportunities for undeveloped land to be developed.</li> <li>In the long term, land use may not be optimally aligned with land use capability, limiting production.</li> </ul> <u>Environmental:</u> <ul style="list-style-type: none"> <li>Excessive contaminant discharges are likely to extend into the future with no certainty that targets will be achieved.</li> </ul>	No
<b>Specific direction to be given effect in regional and district plans and which consent authorities must have regard to</b>					
<b>Option 2</b> Provide a suite of policies and methods requiring plan changes that would establish rules that accord with the Resource Management Act's regime for sustainable land use.	Increases certainty as to how the region will manage water quality and land use. Provides a framework for focusing on at-risk catchments across the region as a priority. Provides interim direction prior to changes being made to the Regional Water and Land Plan. Requires that nutrient discharges be authorised only if the regional council can be satisfied that none of the section 70 effects are likely to arise.	High	<u>Social:</u> <ul style="list-style-type: none"> <li>Establishes clear intent of regulatory intervention.</li> <li>Allowing several years before excessive discharges are reduced reduces social disruption.</li> <li>Immediate benefit in matters advocated in resource consent processes.</li> </ul>	<u>Social:</u> <ul style="list-style-type: none"> <li>Contaminant discharging sectors will be subject to significant change.</li> </ul> <u>Economic:</u> <ul style="list-style-type: none"> <li>Sectors able to operate with reduced contaminant discharges may generate less economic return than those with excessive discharges.</li> </ul>	Yes

Selected option	Analysis of effectiveness	Effectiveness rating	BENEFITS (social, economic and environmental)	COSTS (social, economic and environmental)	Efficient?
	<p>Requires district planning to guide land use towards sustainability. Allows for innovative approaches.</p>		<ul style="list-style-type: none"> <li>▪ Provides greater clarity and certainty to the applicant and consent authority about the matters to which regard is to be had when managing land use.</li> <li>▪ Provides an opportunity for the inequities of the existing regime to be addressed.</li> </ul> <p><u>Economic:</u></p> <ul style="list-style-type: none"> <li>▪ Leads to increased economic stability because of the certainty of future contaminant discharge allowances.</li> <li>▪ Allows tourism and other sectors relying on a clean environment to continue and develop.</li> </ul> <p><u>Environmental:</u></p> <ul style="list-style-type: none"> <li>▪ Avoiding the section 70 effects enhances the quality of the environment.</li> <li>▪ Safeguards the life-supporting capacity of land, soil, water and aquatic ecosystems.</li> </ul>	<p><u>Environmental:</u></p> <ul style="list-style-type: none"> <li>▪ Delay in contaminant discharge targets being required to be met will result in delays in sustainable land use and water quality being achieved.</li> </ul>	
<b>Guidance</b>					
<p><b>Option 3</b> Provide policy tools and allow discretion as to whether they are implemented.</p>	<p>Providing information can guide individuals in their resource management decisions but without addressing cumulative effects. Provides freedom and ownership to the individual and/or community. Allows for innovative approaches. Provides information to the community.</p>	<p>Medium</p>	<p><u>Social:</u></p> <ul style="list-style-type: none"> <li>▪ Improved land and water management if the information is acted upon.</li> <li>▪ Provides flexibility and opportunity to develop other land and water management initiatives.</li> </ul> <p><u>Economic:</u></p> <ul style="list-style-type: none"> <li>▪ Avoids costs associated with regulatory response.</li> <li>▪ Reduces costs to applicant and community.</li> </ul>	<p><u>Social:</u></p> <ul style="list-style-type: none"> <li>▪ Information is not considered.</li> <li>▪ Nobody takes ownership.</li> <li>▪ Defaulting directly to the Resource Management Act instead of having a locally promulgated plan rule framework diminishes respect for local democracy.</li> </ul> <p><u>Economic:</u></p> <ul style="list-style-type: none"> <li>▪ Costs to applicant and community for monitoring and research.</li> </ul>	<p>yes</p>

Selected option	Analysis of effectiveness	Effectiveness rating	BENEFITS (social, economic and environmental)	COSTS (social, economic and environmental)	Efficient?
			<u>Environmental:</u> <ul style="list-style-type: none"> <li>▪ Allows adaptation to changing environmental circumstances.</li> </ul>	<u>Environmental:</u> <ul style="list-style-type: none"> <li>▪ Excessive contaminant discharges are likely to extend into the future with no certainty that targets will be achieved, resulting in section 70 effects.</li> </ul>	
<b>Doing nothing</b>					
<b>Option 4</b> Provide no Resource Management Act intervention for the management of land use.	Uncertainty that responsibility will be taken. Uncertainty that the objective or issues will be addressed. For Rotorua Te Arawa lakes and other at-risk catchments, regional council can not be satisfied that none of the section 70 effects are likely to arise in the receiving waters if current land use continues. Relies on voluntary initiatives and other interventions to achieve the necessary reductions in nutrient discharges. In the time that has elapsed since this approach was adopted, reductions have been insufficient to support confidence that targets will be achieved. Does not meet the Resource Management Act's requirements for discharges to be authorised by a rule or a resource consent. Allows for innovative approaches.	Low	<u>Social:</u> <ul style="list-style-type: none"> <li>▪ Develops an alternative approach.</li> <li>▪ Provides flexibility and opportunity to develop other water management initiatives.</li> </ul> <u>Economic:</u> <ul style="list-style-type: none"> <li>▪ Avoids compliance and consent costs associated with implementing the policies and/or methods.</li> </ul> <u>Environmental</u> <ul style="list-style-type: none"> <li>▪ Allows adaptation to changing environmental circumstances.</li> </ul>	<u>Social:</u> <ul style="list-style-type: none"> <li>▪ Nobody takes responsibility and no action is undertaken.</li> <li>▪ Respect for the law is undermined.</li> </ul> <u>Economic:</u> <ul style="list-style-type: none"> <li>▪ Council taken to court for no action under the RMA.</li> <li>▪ The issues continue and result in reduced economic opportunities.</li> </ul> <u>Environmental:</u> <ul style="list-style-type: none"> <li>▪ Degrades aquatic ecosystem health.</li> <li>▪ Excessive contaminant discharges are likely to extend into the future with no certainty that targets will be achieved, resulting in section 70 effects.</li> </ul>	No

## 6.3 Results of evaluation as to the most appropriate policy and method options to achieve objective 29

Policy and method options	Factors contributing to effectiveness <sup>3</sup>	Efficient?	Selected (most appropriate) option(s) (tick or cross)	Proposed policies and methods
<b>Direction to regional and/or district plans</b>				
<b>Option 1</b> Allow the existing Regional Water and Land Plan provisions to remain unchanged.	Medium	No	x	
<b>Specific direction to be given effect in regional and district plans and which consent authorities must have regard to</b>				
<b>Option 2</b> Provide a suite of policies and methods requiring plan changes that would establish rules that accord with the Resource Management Act's regime for sustainable land use.	High	Yes	✓	Policies WL 1B, WL 2B, WL 3B, WL 4B, WL 5B, WL 6B, WL 7B, WL 8B, WL 9B, WL 10B & WL 11B  Methods 2, 3, 16, 20, 22, 28, 36, 47, 58
<b>Guidance</b>				
<b>Option 3</b> Provide policy tools and allow discretion as to whether they are implemented.	Low	No	x	Policies WL 1B, WL 7B & WL 9B  Methods 3, 16, 20, 36, 47, 58
<b>Doing nothing</b>				
<b>Option 4</b> Provide no Resource Management Act intervention for the management of land use.	Low	No	x	

### 6.3.1 Discussion of options

Having regard to the efficiency and effectiveness of the options, the specifically directive option is appropriate to achieve objective 29 and therefore deal with the regionally significant issues related to water quality and land use.

Option 2 directs changes to plans to require regulatory intervention to improve at-risk catchments. Provided that implementation of this option includes compliance monitoring and enforcement, it will be effective in achieving its targets. While there may be significant costs to some sectors, the overall benefits of environmental quality will flow through into cultural benefits and economic benefits to other sectors.

<sup>3</sup> Effectiveness becomes the net value of an assessment of the relative difference between options in terms of their ability to influence or deliver intended outcomes, i.e. whether they have great or widespread effect versus being of marginal or limited effect.

### **6.3.2 Options not selected**

Option 1 provides broad direction largely by allowing the existing Regional Water and Land Plan provisions to continue. The main cost implication is that environmental targets may not be achieved, resulting in continuing social and cultural costs, and uncertainty. Long term, land use may not be aligned with land use capability.

Option 3 is unlikely to be effective, as shown by recent history. The costs to individuals in voluntarily acting without the confidence that in aggregate the action will be effective is likely to result in little or no action being taken.

Option 4 is assessed as both ineffective and inefficient. Doing nothing is likely to result in unsustainable, unfair and inefficient degradation of water quality, and lasting social and cultural offence, and economic loss.

## **6.4 Risks of acting or not acting if information is uncertain or insufficient**

The link between land use and water quality is well understood qualitatively but relies on assumptions and modelling at a quantitative level.

### **6.4.1 Risks of acting**

Specific numeric targets are the basis for rules. Such targets are established on the advice of specialists informed by years of monitoring, research and modelling. Despite the uncertainty inherent in the data underlying this approach, the understanding derived from the analysis is sufficient to support action. The risk of acting in this situation is that, in time, better data may show that the action taken has been insufficient, resulting in delayed achievement of the target. Alternatively, the action may result in overshooting the target and wasted opportunity. Regularly reviewing the objective and targets, revising them as necessary, provides a sufficiently responsive policy framework to justify proceeding.

### **6.4.2 Risks of not acting**

If no action is taken until sufficient information is available to remove uncertainty, the risk is that environmental quality will continue to deteriorate, investment uncertainty will continue and opportunities will be lost. Community morale will suffer in that people will feel unable to collectively act effectively to enhance degraded environmental resources.



---

## 7 Evaluation of policies and methods to achieve Objective 30

---

Objective 30: The potential of the region's versatile land and rural production activities in the rural environment is sustained for future generations.

The appropriateness of the policies and methods to achieve Objective 30 is evaluated by looking at the effectiveness and the efficiency of the policy and method options and the risks of acting or not acting if there is uncertain or insufficient information.

### 7.1 Range of policy and method options considered to achieve Objective 30

The focus of this section is to determine whether Objective 30 can be best achieved through broad direction to plans, through specific direction to plans and on matters to which regard is to be had when considering resource consent applications, by providing guidance, or by doing nothing.

This is an assessment of policy options to achieve Objective 29 over and above the alternatives assessed in relation to and presented within the Section 32 reports relating to Matters of National Importance, Iwi Resource Management, Integrated Resource Management, Natural Hazards, and Urban Form and Growth Management. This evaluation should therefore be considered in conjunction with those other Section 32 reports as they contain further information pertinent to addressing the regionally significant resource management issues concerning water quality and land use.

#### 7.1.1 Broad direction

##### Option 1: Broad direction to district and/or regional plans

Allow the existing Regional Water and Land Plan provisions to remain unchanged.

#### 7.1.2 Specific direction

##### Option 2: Specific direction to be given effect in regional and district plans and which consent authorities must have regard to

Provide a suite of policies and methods requiring plan changes that would establish rules that accord with the Resource Management Act's regime for sustainable land management.

#### 7.1.3 Guidance

##### Option 3: Guidance

Provide policy tools and allow discretion as to whether they are implemented.

## **7.1.4            Doing nothing**

### **Option 4: Doing nothing**

Provide no Resource Management Act intervention for the management of soil and rural production.

## 7.2 Evaluation as to the effectiveness and efficiency of the policy and method options to achieve Objective 30

Selected option	Analysis of effectiveness	Effectiveness rating	BENEFITS (social, economic and environmental)	COSTS (social, economic and environmental)	Efficient?
<b>Direction to regional and/or district plans</b>					
<p><b>Option 1</b> Allow the existing Regional Water and Land Plan provisions to remain unchanged.</p>	<p>Provides certainty as to how the regional council will manage land use. Continues an established framework across the region. Allows for innovative approaches.</p>	Medium	<p><u>Social:</u></p> <ul style="list-style-type: none"> <li>Allows current land use to continue at existing levels, avoiding disruption to established communities, providing certainty.</li> <li>Provides consistency in the way water is managed.</li> <li>Provides transparency as to what is required and the reasons for this.</li> </ul> <p><u>Economic:</u></p> <ul style="list-style-type: none"> <li>Existing economically productive land use may continue.</li> </ul> <p><u>Environmental:</u></p> <ul style="list-style-type: none"> <li>Caps contamination at a known level.</li> <li>Discharges can be assessed and monitored.</li> </ul>	<p><u>Social:</u></p> <ul style="list-style-type: none"> <li>Cultural, recreational and amenity values associated with surface water continue to be compromised by degraded water quality.</li> <li>Requires voluntary reduction of authorised contaminant discharges.</li> </ul> <p><u>Economic:</u></p> <ul style="list-style-type: none"> <li>Foregone opportunities for undeveloped land to be developed.</li> <li>In the long term, land use may not be optimally aligned with land use capability, limiting production.</li> </ul> <p><u>Environmental:</u></p> <ul style="list-style-type: none"> <li>Excessive contaminant discharges are likely to extend into the future with no certainty that targets will be achieved.</li> </ul>	No
<b>Specific direction to be given effect in regional and district plans and which consent authorities must have regard to</b>					
<p><b>Option 2</b> Provide a suite of policies and methods requiring plan changes that would establish rules that accord with the Resource Management Act's regime for sustainable land management.</p>	<p>Increases certainty as to how the region will manage water quality and land use. Provides a framework for focusing on at-risk catchments across the region as a priority. Provides interim direction prior to changes being made to the Regional Water and Land Plan. Requires that nutrient discharges be authorised only if the regional council can be satisfied that none of the section 70 effects are likely to arise.</p>	High	<p><u>Social:</u></p> <ul style="list-style-type: none"> <li>Establishes clear intent of regulatory intervention.</li> <li>Allowing several years before excessive discharges are reduced reduces social disruption.</li> <li>Immediate benefit in matters advocated in resource consent processes.</li> </ul>	<p><u>Social:</u></p> <ul style="list-style-type: none"> <li>Contaminant discharging sectors will be subject to significant change.</li> </ul> <p><u>Economic:</u></p> <ul style="list-style-type: none"> <li>Sectors able to operate with reduced contaminant discharges may generate less economic return than those with excessive discharges.</li> </ul>	Yes

Selected option	Analysis of effectiveness	Effectiveness rating	BENEFITS (social, economic and environmental)	COSTS (social, economic and environmental)	Efficient?
	<p>Requires district planning to guide land use towards sustainability. Allows for innovative approaches.</p>		<ul style="list-style-type: none"> <li>▪ Provides greater clarity and certainty to the applicant and consent authority about the matters to which regard is to be had when managing land use.</li> <li>▪ Provides an opportunity for the inequities of the existing regime to be addressed.</li> </ul> <p><u>Economic:</u></p> <ul style="list-style-type: none"> <li>▪ Leads to increased economic stability because of the certainty of future contaminant discharge allowances.</li> <li>▪ Allows tourism and other sectors relying on a clean environment to continue and develop.</li> </ul> <p><u>Environmental:</u></p> <ul style="list-style-type: none"> <li>▪ Avoiding the section 70 effects enhances the quality of the environment.</li> <li>▪ Safeguards the life-supporting capacity of land, soil, water and aquatic ecosystems.</li> </ul>	<p><u>Environmental:</u></p> <ul style="list-style-type: none"> <li>▪ Delay in contaminant discharge targets being required to be met will result in delays in sustainable land use and water quality being achieved.</li> </ul>	
<b>Guidance</b>					
<p><b>Option 3</b> Provide policy tools and allow discretion as to whether they are implemented.</p>	<p>Providing information can guide individuals in their resource management decisions but without addressing cumulative effects. Provides freedom and ownership to the individual and/or community. Allows for innovative approaches. Provides information to the community.</p>	<p>Low</p>	<p><u>Social:</u></p> <ul style="list-style-type: none"> <li>▪ Improved land and water management if the information is acted upon.</li> <li>▪ Provides flexibility and opportunity to develop other land and water management initiatives.</li> </ul> <p><u>Economic:</u></p> <ul style="list-style-type: none"> <li>▪ Avoids costs associated with regulatory response.</li> <li>▪ Reduces costs to applicant</li> </ul>	<p><u>Social:</u></p> <ul style="list-style-type: none"> <li>▪ Information is not considered.</li> <li>▪ Nobody takes ownership.</li> <li>▪ Defaulting directly to the Resource Management Act instead of having a locally promulgated plan rule framework diminishes respect for local democracy.</li> </ul> <p><u>Economic:</u></p> <ul style="list-style-type: none"> <li>▪ Costs to applicant and community for monitoring and</li> </ul>	<p>No</p>

Selected option	Analysis of effectiveness	Effectiveness rating	BENEFITS (social, economic and environmental)	COSTS (social, economic and environmental)	Efficient?
			and community. <u>Environmental:</u> <ul style="list-style-type: none"> <li>▪ Allows adaptation to changing environmental circumstances.</li> </ul>	research. <u>Environmental:</u> <ul style="list-style-type: none"> <li>▪ Excessive contaminant discharges are likely to extend into the future with no certainty that targets will be achieved, resulting in section 70 effects.</li> </ul>	
<b>Doing nothing</b>					
<b>Option 4</b> Provide no Resource Management Act intervention for the management of soil and rural production.	Uncertainty that responsibility will be taken. Uncertainty that the objective or issues will be addressed. For at-risk catchments, regional council can not be satisfied that none of the section 70 effects are likely to arise in the receiving waters if current land use continues. Does not meet the Resource Management Act's requirements for discharges to be authorised by a rule or a resource consent. Allows for innovative approaches.	Low	<u>Social:</u> <ul style="list-style-type: none"> <li>▪ Develops an alternative approach.</li> <li>▪ Provides flexibility and opportunity to develop other water management initiatives.</li> </ul> <u>Economic:</u> <ul style="list-style-type: none"> <li>▪ Avoids compliance and consent costs associated with implementing the policies and/or methods.</li> </ul> <u>Environmental</u> <ul style="list-style-type: none"> <li>▪ Allows adaptation to changing environmental circumstances.</li> </ul>	<u>Social:</u> <ul style="list-style-type: none"> <li>▪ Nobody takes responsibility and no action is undertaken.</li> <li>▪ Respect for the law is undermined.</li> </ul> <u>Economic:</u> <ul style="list-style-type: none"> <li>▪ Council taken to court for no action under the RMA.</li> <li>▪ The issues continue and result in reduced economic opportunities.</li> </ul> <u>Environmental:</u> <ul style="list-style-type: none"> <li>▪ Degrades aquatic ecosystem health.</li> <li>▪ Excessive contaminant discharges are likely to extend into the future with no certainty that targets will be achieved, resulting in section 70 effects.</li> </ul>	No

### 7.3 Results of evaluation as to the most appropriate policy and method options to achieve objective 30

Policy and method options	Factors contributing to effectiveness <sup>4</sup>	Efficient?	Selected (most appropriate) option(s) (tick or cross)	Proposed policies and methods
<b>Broad direction to district and/or regional plans</b>				
<b>Option 1</b> Allow the existing Regional Water and Land Plan provisions to remain unchanged.	Medium	No	x	
<b>Specific direction to be given effect in regional and district plans and which consent authorities must have regard to</b>				
<b>Option 2</b> Provide a suite of policies and methods requiring plan changes that would establish rules that accord with the Resource Management Act's regime for sustainable land management.	High	Yes	✓	Policies WL 9B, WL 10B & WL 11B Methods 3, 16, 20, 47, 58
<b>Guidance</b>				
<b>Option 3</b> Provide policy tools and allow discretion as to whether they are implemented.	Low	No	x	Policy WL 1B Method 3
<b>Doing nothing</b>				
<b>Option 4</b> Provide no Resource Management Act intervention for the management of soil and rural production.	Low	No	x	

#### 7.3.1 Discussion on selected options

Having regard to the efficiency and effectiveness of the options, the specifically directive option is appropriate to achieve objective 30 and therefore deal with the regionally significant issues related to land use.

Option 2 directs changes to plans to require regulatory intervention to improve at-risk catchments. Provided that implementation of this option includes compliance monitoring and enforcement, it will be effective in achieving its targets. While there may be significant costs to some sectors, the overall benefits of environmental quality will flow through into cultural benefits and economic benefits to other sectors.

<sup>4</sup> Effectiveness becomes the net value of an assessment of the relative difference between options in terms of their ability to influence or deliver intended outcomes, i.e. whether they have great or widespread effect versus being of marginal or limited effect.

### **7.3.2 Options not selected**

Option 1 provides broad direction largely by allowing the existing Regional Water and Land Plan provisions to continue. The main cost implication is that environmental targets may not be achieved, resulting in continuing social and cultural costs, and uncertainty. Long term, land use may not be aligned with land use capability.

Option 3 is unlikely to be effective, as shown by recent history. The costs to individuals in voluntarily acting without the confidence that in aggregate the action will be effective is likely to result in little or no action being taken.

Option 4 is assessed as both ineffective and inefficient. Doing nothing is likely to result in unsustainable, unfair and inefficient degradation of water quality, and lasting social and cultural offence, and economic loss.

## **7.4 Risks of acting or not acting if information is uncertain or insufficient**

The link between land use and water quality is well understood qualitatively but relies on assumptions and modelling at a quantitative level.

### **7.4.1 Risks of acting**

Specific numeric targets are the basis for rules. Such targets are established on the advice of specialists informed by years of monitoring, research and modelling. Despite the uncertainty inherent in the data underlying this approach, the understanding derived from the analysis is sufficient to support action. The risk of acting in this situation is that, in time, better data may show that the action taken has been insufficient, resulting in delayed achievement of the target. Alternatively, the action may result in overshooting the target and wasted opportunity. Regularly reviewing the objective and targets, revising them as necessary, provides a sufficiently responsive policy framework to justify proceeding.

### **7.4.2 Risks of not acting**

If no action is taken until sufficient information is available to remove uncertainty, the risk is that environmental quality will continue to deteriorate, investment uncertainty will continue and opportunities will be lost. Community morale will suffer in that people will feel unable to collectively act effectively to enhance degraded environmental resources.



## **Appendix 1 – Criteria used to determine regionally significant issues**

---

The criteria used for determining whether an issue was a resource management issue of regional significance were:

- The issue was a natural or physical resource management problem.
- The issue was to be of regional significance (see further criteria below).
- The issue was about achieving the purpose of the RMA.
- The issue did not “repeat” the RMA, the New Zealand Coastal Policy Statement, any other national policy, or another issue in the RPS.
- The issue was explained in the context of the Bay of Plenty region.

Regional significance was determined using the following criteria:

- The issue concerns a resource which is regionally significant, and the issue requires integrated management at a regional level ; and
- There is a potential shortage of the resource and resultant allocation issues; or
- There is a significant level of conflict over the resource which is either occurring or is foreseeable over the next 10 years; or
- The resource is potentially subject to significant adverse effects at a regional level; or
- There are significant issues in terms of Part 2 of the RMA which are or are likely to arise at a regional scale (e.g. maintenance and enhancement of access along waterways); or
- The community has signalled that it regards a particular issue as being of regional significance; or
- The issue is one of national significance (e.g. preservation of natural character) and requires regional intervention; or
- The issue is one of District significance but requires regional intervention; or
- The matter is one which a National Policy Statement or National Water Conservation Order requires to be addressed.



## Appendix 2 – References

---

Environment Bay of Plenty (2004) Bay Trends – Report on the state of the Bay of Plenty environment.

Environment Bay of Plenty (2010) Stakeholder written comments/submissions on the Draft Regional Policy Statement.

Environment Bay of Plenty (2008) The Next Bay of Plenty Regional Policy Statement: Issues and Options.

Environment Bay of Plenty (2008) Monitoring and Evaluation of the Operative Bay of Plenty Regional Policy Statement.

Environment Bay of Plenty, Rotorua District Council and Te Arawa Lakes Trust (2007) Proposed Lakes Rotorua and Rotoiti Action Plan.

Environment Bay of Plenty, Rotorua District Council and Te Arawa Lakes Trust (2008) The Rotorua Lakes 2008 Report Card.