

# **SECTION 42A REPORT**

Report on submissions and further submissions

## **Topic: Strategic Direction**

**Report prepared by: C. O'Callaghan**

**Dated: 2 October 2024**

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## List of submitters and further submitters addressed in this report

Submission no	Submitter
47	Forest and Bird
10	Waikato Regional Council (WRC)
29	Aggregate and Quarry Association (AQA)
31	Transpower New Zealand Ltd (Transpower)
35	Te Ruunanga o Ngaati Mahuta ki te Hauaaaru
27	Horticulture New Zealand (Hort NZ)
38	Te Tokanganui- a-noho Whare (TTRMC)
50	Te Nehenehenui
23	Balance Agri-Nutrients
02	New Zealand Helicopter Association (NZHA)
04	New Zealand Agricultural Aviation Association (NZAAA)
14	New Zealand Pork Industry Board (NZPIB)
12	Heli A1 Limited
39	Firstgas
24	Ministry of Education (MoE)
09	Chorus New Zealand Limited, Connexa Limited, Spark New Zealand Trading Limited and Vodafone New Zealand Limited
43	Graymont (NZ) Limited
17	Waka Kotahi
51	KiwiRail Holdings Ltd
03	Heritage New Zealand Pouhere Taonga (NZHPT)
46	Federated Farmers
FS05	Federated Farmers

FS17	NZ Speleological Society
FS08	Graymont (NZ) Limited
FS02	Ara Poutama Aotearoa the Department of Corrections
FS13	New Zealand Agricultural Aviation Association (NZAAA)
FS15	NZHA
FS30	Transpower New Zealand Ltd (Transpower)
FS23	Te Nehenehenui
FS20	Sheryl Paekau
FS03	Director-General of Conservation (DoC)
FS19	PF Olsen
FS07	Grant Lennox

# **1. Introduction**

## **1.1 Qualifications and Experience**

1. My name is Cathy O'Callaghan. I am contracted by Waitomo District Council to assist with the hearings process for the proposed plan. I hold a first class honours degree in resource and environmental planning from Massey University and a post-graduate qualification in agricultural-environmental science. I have been employed in consenting and policy planning roles in consultancy services, local, regional and central government for over 30 years. I drafted the provisions of the strategic direction chapter.

## **1.2 Code of Conduct**

2. I confirm that I have read the Code of Conduct for Expert Witness in the Environment Court Practice Note 2023 and that I have complied with it when preparing this report. Other than when I state that I am relying on the advice of another person, this evidence is within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.
3. I am authorised to give this evidence on the Council's behalf to the proposed district plan Hearings Commissioners (the Commissioners).

## **1.3 Conflict of Interest**

4. I wish to declare a conflict of interest relating to Horticulture New Zealand. I am the director of a small holding growing kiwifruit and avocados in Thames-Coromandel District. All commercial growers pay a levy to Horticulture New Zealand which in part funds submissions to central and local government. I do not have any property, interests or investment relationships in Waitomo District. To the best of my knowledge, I confirm that I have no other real or perceived conflict of interest.

## **1.4 Preparation of this report**

5. I am the author of this report. The scope of evidence in this report relates to the evaluation of submissions and further submissions received in relation to the strategic direction chapter. The data, information, facts, and assumptions I have considered in forming my opinions are set out in my evidence. Where I have set out opinions in my evidence, I have given reasons for those opinions. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed.

## **2. Scope of Report**

### **2.1 Matters addressed by this report**

6. The provisions of the strategic direction chapter are covered by this report. The scope of my evidence relates to the evaluation of submissions and further submissions received in relation to the provisions associated with the strategic direction chapter, insofar as they relate to land use, subdivision and associated definitions. This report is prepared in accordance with section 42A of the Resource Management Act 1991 (RMA).

### **2.2 Overview of the chapter**

7. The strategic direction objectives have the same status as all other objectives in the plan and provide broad strategic guidance across the district. The objectives provide overarching direction and are in place in the first instance, to guide the development of more specific policies during drafting, and secondly to sit as a companion to these policies. The objectives were agreed with the Council as key issues early in the drafting phase. The strategic direction objectives are not designed as part of a policy hierarchy that prevails over the chapters.
8. The chapter is drafted in two parts. Part 1 relates to objectives on partnership and district wide matters and comprises SD-O1 to SD-O18. Part 2 relates to objectives on urban form and development and comprises SD-O19 to SD-O32.
9. Part 1 of the strategic direction chapter (objectives on partnership and district wide matters) has the specific aim of addressing the following issues:
  - Council's responsibilities under the Treaty of Waitangi – Ti Tiriti o Waitangi.
  - Providing for Te Ture Whaimana o Te Awa o Waikato (the Vision and Strategy) and its significance to the upper Waipa catchment.
  - Ensuring the ability for mana whenua to connect with their traditional sites and carry out their customary practices.
  - Enabling marae and papakāinga and recognising the challenges associated with the development of Māori land.
  - Incompatible development locating in close proximity to existing activities can undermine their ability to operate, or to operate effectively. Inefficient planning frameworks can lead to reduced economic potential for the district and wasted resources.
  - Insufficient provision for land providing employment opportunities will lead to businesses establishing outside the district.
  - Unfettered development can result in disjointed and out of character outcomes, resulting in an unattractive and poorly functioning environment.

- Urban sprawl onto rural land undermines the urban core and reduces the amount of land available for productive rural land uses.
- Some of the district's settlements are isolated and a flexible approach to land use and infrastructure is required.
- Development near Kawhia Harbour can contribute to poor marine water quality.
- The places which hold significance to our community can be forever altered and lost to future generations if they are not identified and protected.
- Poor provision, or a less than enabling approach to infrastructure development can mean that the service needs of a community are not met. However, an enabling approach may result in unacceptable adverse effects.
- Failing to protect the ongoing operation of infrastructure can increase the vulnerability of a community.
- There is a wide network of open spaces in the district that offers a range of above and below ground recreational experiences. It is important for these environments to be accessible whilst protecting the special features they have.
- If development does not take natural hazards into consideration, it can affect people's safety and their property.
- Climate change will mean increased rainfall with higher intensity.
- Understanding the impact of sea level rise on our coastal communities is important in order to reduce inter-generational effects and increase community resilience.
- The district's water resources are precious and in places they require rehabilitation and restoration. It is important to provide for activities that support restoration.

10. Part 2 of the strategic direction chapter (objectives on urban form and development) has the specific aim of addressing the following issues:

- The community have identified what is important in our towns and provided a list of future projects and priorities in the Town Concept Plans. Encouraging implementation of these plans will assist with placemaking and improve levels of urban design.
- Most of the district's population lives in Te Kūiti and this is also the main commercial centre. It is important that Te Kūiti functions well and provides a range of social and economic services.
- There are a significant number of vacant shops in Te Kūiti because the existing commercial area is too large for the catchment it serves. This sprawl of commercial activities affects the character and amenity of the receiving environment. A different approach is required to enhance vitality and maintain the viability of Te Kūiti's commercial centre.
- Unplanned urban growth can lead to poor urban form, disjointed communities, and adverse outcomes on the existing character of towns and settlements.

- Insufficient land available for housing, businesses and industry can stifle growth, decrease housing affordability, and prevent people from living and working in their own community
- Where there is infrastructure capacity, it is important to provide opportunities for more people to live and for businesses to establish.
- Housing affordability is an issue in the district. It's important this plan provides for a range of housing options.
- Ribbon development along the coast detracts from natural character. Making provision for new development within coastal settlements will help to avoid ribbon development along the coast.
- Urban environments that encourage or foster low greenhouse gas emissions through waste minimisation, reduction of transport demand and other methods have significant benefits. The district's existing urban environments have not been established with this focus.
- Urban development onto high quality rural land can affect the primary productivity of the district.
- It is inefficient for future urban areas to be unplanned and not infrastructure ready. For this reason, it is a requirement for future urban areas to have a structure plan.
- It is important to recognise the benefits and provide for nationally and regionally significant infrastructure, industry and significant mineral resources.

## **2.3 Statutory Requirements**

### **Resource Management Act**

11. This plan has been prepared in accordance with the Council's functions under the RMA, specifically Part 2, sections 31, 74 and 75, and its obligation to prepare, and have particular regard to, an evaluation report under section 32. The section 32 report which addresses this chapter sets out how the relevant national policy statements, national environmental standards, provisions of the Waikato Regional Policy Statement, the Manawatū-Whanganui One Plan, the Maniapoto Environmental Management Plan, the Waikato Tainui Environment Management Plan 2018 and Te Ture Whaimana o Te Awa o Waikato - The Vision and Strategy for the Waikato River have been assessed and considered.

## **3. Consideration of submissions received**

### **3.1 Overview of submissions**

12. The table of submissions is contained in Appendix 1 of this report. 114 submission points and further submission points were received on the strategic direction chapter.



## 3.2 Structure of this report

13. This report is structured into 3 topic areas, being:

- Topic 1: Objectives on partnership and district wide matters
- Topic 2: Objectives on urban form and development
- Topic 3: Other matters

## 4. Analysis and Recommendations

### Topic 1: Objectives on partnership and district wide matters

14. The Waikato Regional Council (WRC) request that SD-O2 is amended to specify that the document is 'given effect to' rather than the current wording which reads: 'Te Ture Whaimana o Te Awa o Waikato (the Vision and Strategy for the Waikato River) is achieved through active measures to protect and restore the health and well-being of the Upper Waipa Catchment'. WRC are correct that the strategy must be given effect to and the provisions in this plan hopefully attest to this. Most of the policies in the chapters use 'give effect', however for this objective, the change is not considered to be necessary. The wording is easily interpretable by plan users and doesn't detract from the 'give effect' obligation. No change is recommended.
15. SD-O2 aims to ensure that compatible activities are directed to the correct zone or precinct. The New Zealand Agricultural Aviation Association and Heli A1 Limited suggest that SD-O5.3 uses the term 'lawfully established activities' rather than 'existing lawful activities'. 'Lawfully established activities' is used throughout the plan, and it is agreed that the terms should be amended to ensure wording consistency as far as is possible. The proposed amended is shown below.
16. The Ministry of Education suggests that a new policy point is added to SD-O5 which would read: Includes additional infrastructure to support residential communities. It is agreed that infrastructure is a necessary component of any development, however this objective refers to locating compatible activities together so that character and amenity is not compromised, resources (including infrastructure) are provided efficiently, and activities are not located next to zones or precincts where reverse sensitivity might occur. This objective is not the appropriate place for this addition, and it is recommended that the submission point is rejected. It is noted that provision for infrastructure in the manner suggested by the Ministry is contained in SD-O8, 21 and 22.

**SD-O5.** Compatible activities with similar effects and functions are located together and new development is directed towards the appropriate zones to ensure that land use and subdivision:

1. Are consistent with the anticipated character and amenity values of the areas where they are located; and

2. Efficiently use natural and physical resources in order to meet the community's and the environment's needs both now and in the future; and
  3. Recognise [existing](#) lawfully [established](#) activities and protect their ongoing operation from incompatible activities.
17. Section 32AA: The recommended amendment aligns wording with the rest of the plan and does not materially change the objective. A section 32AA evaluation is not required.
18. Federated Farmers request that SD-O10 and O11 are amended by adding recognition that the protection referred to in the objective is from 'inappropriate subdivision, use and development'. Currently the objectives simply refer to protecting the listed matters, but the RMA makes the specific reference to 'appropriateness' in sections 6(a), (b) and (f). As such, Federated Farmers raise a valid point. The issue is that 'appropriateness' is not applied to all the matters of national importance in section 6. Having said this, 'protection' is not applied uniformly in section 6 either. Additionally, the objectives are intended to encompass some areas (notably the karst overlay and the landscapes of high amenity value) that are provided for under RMA section 7 which tends to rely on 'maintain and enhance' rather than 'protect'. These are important distinctions. As such, Federated Farmers' submission point is helpful because the objectives really should refer to the listed items being 'appropriately protected' and default to the more specific policy provisions to make the distinctions required.
19. The recommended amendment would also require a consequential change to SD-O13 which similarly uses the blanket term 'protection'. Federated Farmers also ask that SD-O11 is reworded to clarify its application. Accordingly, it is recommended that the submission point is accepted in part and the proposed amendments are shown below:
- SD-O10.** The buildings, structures, sites, areas, ecosystems, natural landscapes and features identified as having special qualities and values and which contribute to the district's sense of place and identity, are [appropriately](#) protected.
- SD-O11.** The [coastal environment and its](#) components ~~of the coastal environment~~ including outstanding landscapes and features, natural character and ecosystems, together with the cultural and spiritual values accorded by mana whenua, are recognised and [appropriately](#) protected.
- SD-O13.** The district's communities have access to a diverse and connected network of open spaces which offer a range of recreational experiences while [appropriately](#) protecting the values of scheduled sites, features and overlays.
20. Section 32AA: The recommended amendments are not substantial enough to require a section 32AA assessment. The amendment to SD-O11 reorders the wording for clarity and has no impact on the objective. The introduction of the word 'appropriately' clarifies that different levels of protection are accorded to different features dependent on the direction of the RMA. Again, this is a correction and clarification rather than having an impact on the aims or implementation of the objective. A section 32AA

evaluation is not required.

21. Forest and Bird request amendments to SD-O14 and O15. SD-O14 seeks no significant increase in the risk from known natural hazards, including the effects of climate change, to people, property and infrastructure as a result of subdivision, land use and development. SD-O15 aims to ensure the community is prepared to adapt to the effects of climate change and recognises the opportunities and risks associated with those effects. Forest and Bird suggest both objectives should apply to the effects/risks to indigenous species and habitats. The amendments proposed do not sit well in the two objectives, however Forest and Bird raise an interesting point. The policy framework in the plan's chapters does consider the effects of climate change on ecosystems and their component parts. A separate objective may therefore be a valid addition to the strategic direction chapter. Forest and Bird are invited to present additional information and potential wording to the Commissioners for their consideration. In the interim, the submission points are rejected pending the presentation of further options.
22. SD-O18 affords the consideration of the transfer of functions, powers or duties to Iwi Authorities under section 33 of the RMA where this provides for improved efficiencies, environmental and social benefits. Federated Farmers submit that SD-O18 is unnecessary as RMA section 33 already provides for the transfer of powers to iwi and other authorities. This is true. The submitter may not be aware that Waitomo District Council shares a Joint Management Agreement (JMA) with Te Nehenehenui. A cornerstone of this agreement is the commitment to work together in good faith and a spirit of co-operation. The JMA working group requested the inclusion of this provision and Council agrees that there may be functions that are appropriate to transfer to Iwi Authorities. In the spirit of honest and transparent communication (also in the JMA), this has accordingly been signalled. No change is recommended.

## **Topic 2: Objectives on urban form and development**

23. SD-O21 requires subdivision and development within townships and within the future urban zone to occur in a planned, integrated and co-ordinated manner which ensures that infrastructure has sufficient capacity to accommodate the form and type of development anticipated. The Ministry of Education requests the term 'additional infrastructure' is applied as the RMA definition of 'infrastructure' does not include education facilities - but the National Policy Statement on Urban Development (NPS-UD) definition of 'additional infrastructure' does. The Ministry also request the addition of the NPS-UD definition in the plan.
24. It is agreed that these are sensible additions to SD-O21 and to the definitions section. The increased policy breadth will ensure that subdivision and development include provision for the expansion of existing or new educational, community and health facilities and public open space to accommodate the demand of the development. The recommended amendments would read:

**additional infrastructure means:**

- (a) public open space
- (b) community infrastructure as defined in section 197 of the Local Government Act 2002
- (c) land transport (as defined in the Land Transport Management Act 2003) that is not controlled by local authorities
- (d) social infrastructure, such as schools and healthcare facilities
- (e) a network operated for the purpose of telecommunications (as defined in section 5 of the Telecommunications Act 2001)
- (f) a network operated for the purpose of transmitting or distributing electricity or gas

**SD-O21.** Require subdivision and development within townships and within the future urban zone to occur in a planned, integrated and co-ordinated manner which ensures that infrastructure (including additional infrastructure), has sufficient capacity to accommodate the form and type of development anticipated.

25. Section 32AA: See Appendix 3

26. Forest and Bird and WRC request amendments to SD-O24. The objective promotes livable, sustainable, well-functioning urban environments by incorporating low impact design solutions and matauranga Māori principles in the planning and construction of developments. Both submitters seek that 'low carbon' design solutions are added. Forest and Bird additionally seek 'nature-based' design solutions. Low impact design is an aspirational concept given the district's existing urban environments have not been established with this focus. On balance, it is considered that the term 'low impact' conveys both concepts and SD-O27 appropriately addresses a low carbon approach. While neither proposed addition is offensive to the objective, they would make the wording very long and harder to interpret. No change is recommended.

27. SD-O26 seeks to ensure that development in coastal settlements is appropriate in relation to its level of natural character, avoids ribbon development along coastal margins and ensures planned, cohesive, compact growth. Forest and Bird and WRC request the objective includes the provision to avoid areas of natural hazard risk. RMA Section 6(h) requires the management of significant risks from natural hazards, rather than their avoidance. In any event, this matter is considered to be adequately covered by SD-O14. No change is recommended.

28. Forest and Bird also request SD-O26 is amended is read: Ensure that development in coastal settlements is appropriate ~~in relation to its level of~~ to protect coastal natural character, avoids areas of natural hazard risk and ribbon development along coastal margins, and ensures planned, cohesive, compact growth. As notified SD-O26 reads:

**SD-O26.** Ensure that development in coastal settlements is appropriate in relation to its level of natural character, avoids ribbon development along coastal margins and ensures planned, cohesive, compact growth.

29. The basic direction in Policy 13 of the New Zealand Coastal Policy Statement is to preserve the natural character of the coastal environment and to protect it from inappropriate subdivision, use, and development. Outside areas of outstanding natural character, the plan must avoid significant adverse effects and avoid, remedy or mitigate other adverse effects of activities on natural character. So, in coastal settlements, 'protect' applies in relation to protection from inappropriate activities. On balance, the wording provided by Forest and Bird is correct. The duty is to preserve natural character subject to the test of appropriateness. The recommended change would read:

**SD-O26.** Ensure that development in coastal settlements is appropriate ~~to protect in relation to its level of coastal~~ natural character, avoids ribbon development along coastal margins and ensures planned, cohesive, compact growth.

30. Section 32AA: See Appendix 3

31. SD-O27 seeks to encourage urban development that supports reductions in greenhouse gas emissions, minimises waste production, transport and energy demand, and is resilient to the current and future effects of climate change. Waka Kotahi requests the word 'supports' is amended to 'contributes to'. It is considered that both terms have the same meaning in the context of the objective and no change is recommended.

32. WRC and Forest and Bird request SD-O28 is amended to 'avoid' rather than 'minimise' urban expansion onto highly productive land. This is agreed. Policy 5 of the National Policy Statement for Highly Productive Land reads: The urban rezoning of highly productive land is avoided, except as provided in this National Policy Statement. Policy 6 states: The rezoning and development of highly productive land as rural lifestyle is avoided, except as provided in this National Policy Statement. Policy 7 reads: The subdivision of highly productive land is avoided, except as provided in this National Policy Statement. The recommended amendment would read:

**SD-O28.** ~~Minimise~~ Avoid urban expansion onto highly productive land unless there is a demonstrated shortage of development capacity to meet demand and alternative locations and options to provide for the required demand, including intensification of existing urban areas, are unfeasible.

33. Section 32AA: The recommended amendment responds to direction in the National Policy Statement for Highly Productive Land. Leaving the objective unamended is counter to national direction and would not give effect to its provisions. A section 32AA is not required.

34. SD-O30 reads:

**SD-O30.** Recognise and provide for nationally and regionally significant infrastructure and industry, and for those activities associated with significant mineral resources.

35. The New Zealand Helicopter Association requests the term 'infrastructure

security' is added to the objective. Federated Farmers request the objective is amended to implement their revised definition of 'regionally significant industry'. Chorus et al request the provision is moved to the objectives under district wide matters.

36. Infrastructure security is not defined in the plan but appears to be the practice of protecting critical systems and assets against physical and cyber threats. It also appears to be focused on limiting vulnerability to sabotage. This may be a valid inclusion to the chapter, but further information is required to understand the ramifications fully, and accordingly the New Zealand Helicopter Association is invited to present additional information and potential wording to the Commissioners for their consideration. In the interim, the submission points are rejected pending the presentation of further options.
37. In respect of Federated Farmers' submission point, the Waikato Regional Policy Statement defines 'regionally significant industry'. This plan uses this definition without amendment because it is considered better to rely on a region-wide or national definition wherever this is possible. This approach assists users of multiple plans and ensures consistency of terms as far as this is practical. The request to amend the definition was rejected in the General Rural Zone Section 42A report and it is not considered appropriate to amend SD-O30 in response.
38. It is agreed that the provision would be better located with the objectives under district wide matters.
39. Graymont requests that SD-O5(1) is amended to recognise the functional, locational and operational needs of particular activities. At SD-O8, KiwiRail request a new objective which manages land use activities to avoid, remedy or mitigate adverse effects, including reverse sensitivity effects, of subdivision, land use and development, on regionally significant infrastructure including transport. It is recommended that SD-O30 is amended to address these matters. Along with the relocation of the objective, this amendment should respond to the submitters' requests. The proposed changes would read:

**SD-O30.** Recognise and provide for nationally and regionally significant infrastructure and industry, and for those activities associated with significant mineral resources, by recognising their functional, locational and operational needs and managing reverse sensitivity effects which may impact their operation.

40. Section 32AA: See Appendix 3

### **Topic 3: Other matters**

41. Transpower requests that the overview is amended so it reads: The objectives in this chapter ~~have the same status as all other objectives in the plan but~~ provide strategic guidance across the district. The status of the objectives in this chapter is a critical issue for the plan. There is an awareness that there have been significant issues in other plans about the

status of the policy framework in regard to the strategic direction chapter. The decision was made during drafting that overarching direction was to be provided but this was in place to guide the development of more specific policies, and to sit as a companion to these policies. In fact, the objectives were agreed with the Council in the form of key issues early in the drafting phase. The objectives are not designed as part of a policy hierarchy that prevails over the chapters.

42. For completeness, the National Planning Standards do not require the strategic direction objectives to take precedence over other policy direction in the plan.

## 7. District-wide Matters Standard

Mandatory directions

### Strategic direction

1. If the following matters are addressed, they must be located under the *Strategic direction* heading:
  - a. an outline of the key strategic or significant resource management matters for the district
  - b. issues, if any, and objectives that address key strategic or significant matters for the district and guide decision making at a strategic level
  - c. policies that address these matters, unless those policies are better located in other more specific chapters
  - d. how resource management issues of significance to iwi authorities are addressed in the plan.
2. Rules must not be included under the *Strategic direction* heading.
3. An *Urban form and development* chapter must be included under the *Strategic direction* heading.
4. Each strategic direction matter must be its own chapter and be included alphabetically under the *Strategic direction* heading.

43. Four submitters request a new objective related to the rural environment which reads:

SD-OX            Primary production activities can operate efficiently and effectively and the contribution that they make to the economic and social well-being and prosperity of the district is recognised and provided for.

44. Federated Farmers similarly request a new objective which reads: 'Rural industry and rural environments are recognised for the important role they play in the district's economy and are protected from any negative effects from sensitive or incompatible activities that seek to establish adjacent to them'. On balance, the objective proposed above is considered to be a sensible inclusion to the chapter which does not contain a specific provision for the rural environment. The objective proposed by the four submitters is similar to Federated Farmers' wording but could be strengthened by including the Federated Farmers' reference to reverse sensitivity. It is noted that rural activities cannot be 'protected' from reverse sensitivity, but reverse sensitivity effects can be 'managed'. The recommended amendment would read:

**SD-OX**

Primary production activities can operate efficiently and effectively, reverse sensitivity effects which may impact their operation are managed and the contribution that they make to the economic and social well-being of the district is recognised.

45. The New Zealand Pork Industry Board (NZPIB) request a number of new objectives/policies for the district's rural environment. The first change requested reads: 'Waitomo's rural environment contributes positively to the district's economic and social wellbeing'. It is considered that this intention is now encompassed by the new objective proposed above. The second reads: 'Rural land remains available for primary production activities and productive capacity is protected'. This is addressed by SD-O28. The third request reads: 'Reverse sensitivity effects are managed so as not to constrain primary production activities'. This intention is now encompassed by the new objective proposed above. Finally, NZPIB requests: 'Opportunities for rural lifestyle subdivision and development are only provided in parts of the rural environment where they do not conflict with enabling primary production and protecting the productive potential of land'. This is addressed by a combination of the new objective and SD-O28. Given these matters are all provided for, it is recommended that this submission point is accepted in part.



## **APPENDIX 1 SUBMISSIONS TABLE**

## **APPENDIX 2 AMENDMENTS TO THE STRATEGIC DIRECTION CHAPTER**

Strikethrough is shown as an addition or  
~~deletion~~

## **APPENDIX 3 SECTION 32AA EVALUATION**

1. A section 32AA evaluation is only required for any changes that are proposed to the provisions of this plan since the original section 32 evaluation report for the proposal was completed. The section 32AA evaluation must be undertaken at a level of detail that corresponds to the scale and significance of the changes.