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**Sent:** Wednesday, 30 April 2025 1:06 pm  
**To:** haveyoursay  
**Subject:** Submission from Waikato Regional Council to Waitomo District Council's Annual Plan consultation  
**Attachments:** Submission from WRC to Waitomo District Council's 2025\_2026 Annual Plan. 30 April 2025.pdf

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Kia ora koutou,

Please find attached Waikato Regional Council's submission on **Waitomo DC's Annual Plan Consultation**.

We wish to speak at the hearings.

We would be grateful if you could please confirm receipt of this submission.

Note, a separate email will be sent with our submission to your water services consultation.

Ngā mihi,  
Annika

**Annika Hamilton** | SENIOR CORPORATE PLANNER | Corporate Planning, Finance and Business Services  
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30 April 2025

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Ben Smit  
Chief Executive  
Waitomo District Council  
PO Box 404  
Te Kūiti 3941

Dear Ben

**Submission from Waikato Regional Council to Waitomo District Council's 2025/2026 Annual Plan**

Thank you for the opportunity to submit on Waitomo District Council's Annual Plan 2025/2026. Please find attached the Waikato Regional Council's submission regarding the proposed plan. The submission has been endorsed by the Submissions Subcommittee.

Should you have any queries regarding the content of the submission, please contact Annika Hamilton, Senior Corporate Planner, Corporate Planning directly on 07 859 0990 or by email [Annika.hamilton@waikatoregion.govt.nz](mailto:Annika.hamilton@waikatoregion.govt.nz).

Yours faithfully

A handwritten signature in black ink, appearing to read "Tracey May".

Tracey May  
**Director Science, Policy and Information**

## **Submission from Waikato Regional Council to Waitomo District Council's 2025/2026 Annual Plan**

### **Introduction**

1. We appreciate the opportunity to make a submission to Waitomo District Council's Annual Plan 2025/2026.
2. Waikato Regional Council (WRC) values the collegial working relationship it shares with Waitomo District Council, as well as our councils' shared economic and infrastructure goals, which we seek to achieve through ongoing collaboration with the region's other local authorities, iwi, the private sector, and central government. Collaboration on regional solutions will enable growth and strengthen economic resilience, paying dividends in a manner that seamlessly disregards administrative boundaries.
3. WRC would like to speak at the hearings in support of this submission.

### **Transport**

4. WRC would like to acknowledge your council's efforts in collaborating on our regional transport rating model. We want to ensure the way we collect rates for public transport is as fair, simple and efficient as possible, and the options we have developed take into account the views of local councils and community.

### **Regional resilience and adaptation planning**

5. WRC would like to highlight the importance of providing and planning for resilient communities.
6. We encourage the proactive identification of communities that would benefit from long-term adaptive planning. For example, areas where there is flooding risk such as Te Kūiti and Piopio. This work requires collaborating closely with Waikato Regional Council to understand your district's natural hazard susceptibility and risk. We encourage territorial authorities to lead these activities, with support from Waikato Regional Council. Funding these activities will allow the leveraging of national funding and will complement the existing investment from WRC.
7. We also note that territorial authorities have a critical role in communicating natural hazards information to communities through the district plans and land information memoranda (LIM). Recent changes to the Local Government Official Information and Meetings Act 1987 (LGOIMA) require territorial authorities to make natural hazards information known to them in LIM reports. We encourage territorial authorities to ensure the appropriate implementation of this new regulatory requirement.

### **Mokau Seawall**

8. We acknowledge that the proposals included in the consultation document provide a risk management option for Mōkau. However, we strongly encourage Waitomo District Council to consider undertaking a wider community adaptation project in collaboration with WRC and the Mōkau community. This would provide the opportunity to explore a series of options that could be implemented in the short, medium and longer term, taking into consideration sea level rise and climate change, and providing for a more resilient Mōkau. WRC is currently working in collaboration with Hauraki District Council (Wharekawa Coast 2120 and Hauraki Plains Adaptation Planning), Thames-Coromandel District Council (Shoreline Management Pathways) and Waikato District Council (Waikato District Resilience Project) on plans to increase the resilience of their coastal communities to current and future natural hazards and climate change. Other government agencies working in these projects include the New Zealand Transport Agency, the Department of Conservation, the Ministry for the Environment, and the Department of Internal Affairs.

9. Working proactively to plan for the community's long-term resilience allows Waitomo District Council to implement direction under the Waikato Regional Council Policy Statement (WRPS). For example, undertaking a long-term adaptation project for Mōkau would align with WRPS HAZ-M3 - assess natural hazard risk to communities. This states that WRC will work collaboratively alongside territorial authorities, tangata whenua and other agencies to undertake assessments of coastal and other communities at risk or potentially at risk from natural hazards and develop long-term strategies. This proposal will impact implementation of WRPS HAZ M3 through the Proposed Waitomo District Plan (PWDP). The PWDP includes policies aimed at facilitating community discussions on adaptive pathways, agreeing on adaptive management strategies for areas with new hard protection structures and increasing resilience to the projected effects of climate change.
10. We also note the guidelines set by the NZCPS that apply to repairing a temporary hard structure that is unlikely to last long term (in particular, policies 25 and 27). In a 100-year context, repairing a seawall that only lasts approximately ten years does not align with the objectives of the NZCPS. Therefore we advocate for a wider and more holistic view to natural hazard risk mitigation. Focusing on risk mitigation via structural defences is likely to create an expectation in the community that this can be carried out long-term, however we note that projected increases in erosion rates and sea level rise will likely make the costs prohibitive for the community in the long-term. We also note that the size and location of the sea wall (approximately 60m of the Mokau sea wall) are likely to limit the proposal's benefits for the wider community (see Figure 1).



**Figure 1.** Mokau Spit showing location (red outline) of current 60m (approximately) long Point Road Seawall for renewal (Option 1) or removal (Option 2).

## Waste

11. We support an approach that will minimise waste to landfill through avoidance, reuse systems and increased recycling and recovery, in alignment with Goal 2 of your council's Waste Management and Minimisation Plan (WMMP).
12. We applaud Waitomo District Council for the work undertaken so far in supporting schools and communities to avoid and reduce waste, which has seen landfill disposal go down. We also support your council's approach to helping the community reduce waste regardless of end-of-life options. This approach aligns with our Waikato Regional Waste Prevention Action Plan 2020-2025, where we set out our journey towards a circular economy in the Waikato Region.

### **Regional Spatial Strategy**

13. Through our 2024-2034 Long Term Plan, WRC has made a commitment to investing in the future of spatial planning for the region. The spatial plan will provide a strategic approach to planning across local boundaries, allowing for better informed decisions and smarter investments to improve the wellbeing of our communities and environment. We encourage your council to consider making resources available to collaborate on this important work, which will lead us to sustainable development, efficient provision of infrastructure and services needed for growth, and adequate land supply for future residential, commercial and industrial development.

### **Coastcare**

14. WRC leads Coastcare in the Waikato region. Restoring dunes and other coastal ecosystems has a multitude of benefits, increasing both community resilience and biodiversity values and strengthening community connections to place.
15. Restoration of coastal ecosystems is supported by the New Zealand Coastal Policy Statement (2010) as a natural defense against coastal hazards. Sand dunes provide habitat for many threatened flora and fauna species, and act as both a reservoir of sand for the beach and a buffer for property and infrastructure. Coastcare works across both coasts of the Waikato and relies significantly on communities and volunteers to deliver much of the work programme on the ground.
16. We encourage territorial authorities to work with Coastcare to restore and protect coastlines in their regions. With more partners, resources and funding, we can deliver more work in your communities and throughout the region.