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1 November 2024

Waitomo District Plan Review
Waitomo District Council

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Dear Greg Hill (Chairperson),

Waikato Regional Council Staff Submission on all other topics of the Proposed Waitomo District Plan

1. I request that this letter is tabled at the second tranche of hearings for the Proposed Waitomo District Plan on 27 November 2024, confirming Waikato Regional Council's (WRC) position on the recommendations presented in the Section 42A hearing reports for all remaining topics.
2. WRC lodged a submission on the Proposed Waitomo District Plan. In summary and regarding all other Tranche 2 topics other than Ecosystems and Indigenous Biodiversity, the submission sought:
 - (a) Stronger direction to protect Highly Productive Land under SD-O28
 - (b) Removal of duplicated rules in the Network Utilities and Transport chapters, in addition to clarification of the relationship between the Network Utilities chapter and other topics
 - (c) Recognition of the contribution of transport activities to greenhouse gas emissions as well as additional provisions concerning the mitigation of greenhouse gas emissions and climate change
 - (d) Closer alignment of the proposed plan with Waikato Regional Policy Statement NATC provisions to safeguard the life-supporting capacity of freshwater aquatic ecosystems
 - (e) Reduced limits for indigenous vegetation removal in the proposed NFL chapter
 - (f) Amendments to the proposed coastal setbacks for plantation forestry to be consistent with Resource Management (National Environmental Standards for Commercial Forestry) Regulations 2017.
3. WRC staff support the recommendations made by the authors of the Tranche 2 section 42A reports in connection with WRC's submission points on the topics.
4. In particular, we support:
 - (a) Changing the word "minimise" to "avoid" in proposed SD-O28
 - (b) The removal of duplicated provisions from the Network Utilities chapter
 - (c) Recognition of transport as a significant contributor to greenhouse gas emissions in the Overview section of the Transport chapter, and the recommendation to include a new policy which addresses environmental effects of the transport network

- (d) Additional clauses in proposed NATC-P1 and amendments to the text in NATC-P2 to promote restoration and rehabilitation, and the safeguarding of life-supporting capacity and freshwater ecosystems of wetlands, lakes and rivers and their margins.
- 5. Further, we appreciate and concur with the justifications provided for WRC submission points which were rejected.
- 6. Regarding the outstanding Tranche 1 matter of rezoning Highly Productive Land as Rural Lifestyle Zone (RLZ):
 - (a) Paragraphs 50 to 59 of the Rural Lifestyle Zone section 42A report acknowledged that some areas of the proposed Rural Lifestyle Zone met the transitional requirement of 'Highly Productive Land' under clause 3.5(7) of the National Policy Statement for Highly Productive Land (NPS-HPL). To support the rezoning of that land, there must be sufficient information to satisfy clause 3.10 of the NPS-HPL
 - (b) The RLZ s42A author noted that assessments of the proposed RLZ sites against clause 3.10 matters would be sought in time for the second tranche of section 42A reports. WRC staff have not seen these assessments so are unable to provide additional comment
 - (c) WRC continues to advocate for an assessment under clause 3.10 of the NPS-HPL to support the decision on the proposed rezoning of highly productive land to Rural Lifestyle Zone (RLZ) under the proposed plan.
- 7. In conclusion:
 - (a) WRC is in general support of the section 42A report authors' recommendations on the remaining topics of Tranche 2 and does not consider it necessary to be heard at the hearing.
 - (b) As outlined in paragraph 6 above, WRC requests further assessment through the WRC submission be undertaken to satisfy clause 3.10 of the NPS-HPL for the proposed RLZ areas on highly productive land.

Please note that should the Section 42A authors for Waitomo District Council change their position or recommendations on the above, WRC's position outlined in this letter may be subject to change.

Should the hearings panel have any queries regarding the content of this letter please contact Sarah Knott – Policy Advisor, Policy Implementation on (07) 949 7503 or by email Sarah.Knott@waikatoregion.govt.nz.

Yours sincerely,



Lisette Balsom
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