



Comments Form

Draft Change 5 (Kaituna River) to the Bay of Plenty Regional Policy Statement

Your name and contact details:

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Comments: (where possible please refer to specific sections, objectives, policies, methods, and pages).

Thank you for the opportunity to provide comment on Draft Change 5 (Kaituna River) to the Bay of Plenty Regional Policy Statement.

To confirm, TCC supports the development of this change, through to notification noting that it has identified some changes which it considers would be appropriate to the significant issues statements, objectives and policies.

At present, TCC has a number of projects either underway (i.e. in construction) or through planning which in some way will interface with the Kaituna River. These include the progression of the Wāirakei Urban Growth Area, planning for the Te Tumu Urban Growth Area and implementation of the Waiāri Water Supply Scheme.

Progression of those projects which are currently being planned (i.e. Te Tumu) must give effect to the National Policy Statement – Freshwater Management, along with other National Policy Statements.

TCC has provided comments on the document, in the below table. We understand these are informal comments, at this stage in the process and record that the Tauranga City Council reserves the right to make a formal submission on the change at the appropriate time.

Campbell Larking
Team Leader: Planning Projects
Tauranga City Council

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Please feel free to continue writing overleaf or on additional pages.

Please return your Comments Form by **Friday, 16 October 2020.**

Freepost: Freepost Bay of Plenty Regional Council
Bay of Plenty Regional Council
PO Box 364
Whakatāne 3158

Fax: 0800 884 882

You can also download this Comments Form from our website www.boprc.govt.nz/rps and return by email:

Email: rps@boprc.govt.nz

Section	Page No.	Support/Oppose	Comments	Reasons
<p>2.12.4 Significant Issues affecting the Kaituna River and its tributaries.</p> <p>Water demand is high and could pose a risk for springs and surface water bodies</p>	1	Oppose	<p>TCC is concerned about the direct reference to Te Tumu, as a sole growth area which will place increased demand on water in the lower Kaituna. Demand for water, by urban population growth, will occur irrespective of whether the Te Tumu urban growth area proceeds or does not. This is because water takes from the Waiāri are part of a Citywide network, and the Waiāri water treatment plant does not solely provide water to Te Tumu. It is in fact any/all population growth reliant on the water takes from the Kaituna River which will place an increased demand on water in the lower Kaituna.</p> <p>TCC suggests the following changes to the wording:</p> <p>Current consented allocation exceeds water quantity limits in several sub-catchments of the Kaituna River and its tributaries and also in parts of the underlying groundwater resource. Increasing water demand particularly for agriculture, horticulture, industrial and municipal uses signals a need to assign and manage uses within surface and groundwater limits to provide for key values of these water bodies and springs associated with them. Water demand is particularly high in the lower Kaituna River catchment. Projected urban population growth in Te Puke and Te Tumu will <u>also</u> place increased demand on water in the lower Kaituna</p>	As outlined in the comments section.

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<p>2 Urban growth, climate change, land use intensification and development</p> <p>Land use intensification and development, urban growth and climate change effects are all placing pressure on the ability to restore, protect and enhance the state of the Kaituna River and wetland habitats.</p>	1-2	Oppose	<p>TCC is concerned that the reference to “Land use intensification and development, urban growth” is unqualified, and covers all activities, rather it is the inappropriate or unplanned activities which are those likely placing pressure on the ability to restore, protect and enhance the state of the Kaituna River and wetland habitats. It is also not clear what the term land use intensification refers to, so clarity is sought that this is rural land use intensification (as the term is separate from urban growth)</p> <p>TCC suggests the following changes to the wording:</p> <p>2 <u>Inappropriate subdivision, use and development, climate change effects and rural land use intensification</u> Urban growth, climate change, land use intensification and development Land use intensification and development, urban growth and climate change effects are all placing pressure on the ability to restore, protect and enhance the state of the Kaituna River and wetland habitats.</p>	As outlined in the comments section.
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<p>Objective 41 Water quality and the mauri of the water in the Kaituna River and its tributaries is restored to a healthy state which meets agreed standards.</p>	<p>6</p>	<p>Oppose</p>	<p>TCC is concerned that the objective, as written, has assumed that a “healthy state which meets agreed standards” has been defined, which it has not been. It is inappropriate, in an objective (which is an outcome focused statement) to reference a future “to be determined” outcome. Further, without clarity, the term “healthy state” is unable to be measured also.</p> <p>It is, in TCC’s opinion that the policy should define the Objective, and what is a healthy state and what the agreed standard is (which TCC believes it does).</p> <p>TCC suggests the following changes to the wording:</p> <p>Objective 41 Water quality and the mauri of the water in the Kaituna River and its tributaries is <u>progressively improved</u> restored to a healthy state which meets agreed standards.</p>	<p>As outlined in the comments section.</p>
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<p>Objective 44 The environmental well-being of the Kaituna River is enhanced through best management practices &</p> <p>Policy KR 5B: Enhancing the mauri of the Kaituna River through improved land management practices.</p>	<p>7, 15, 18</p>	<p>Oppose</p>	<p>Objective 44 and Policy KR 5B wording varies throughout the document. They are either referred to with:</p> <ul style="list-style-type: none">• best management practices or land management practices. <p>The above requires clarification of what terminology is to be used. TCC suggests the following changes to the wording:</p> <p>Objective 44 The environmental well-being of the Kaituna River is enhanced <u>through improved land management practices</u> best management practices</p> <p>Policy KR 5B: Enhancing the mauri of the Kaituna River through <u>improved land management practices</u> best management practices</p>	
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