



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).

Western Bay of Plenty District Council (WBOPDC) welcomes Change 5.

As active members of Te Maru o Kaituna, we are pleased to see Kaituna He Taonga Tuku Iho - the Kaituna River Document - given recognition in the RPS.

The Kaituna River and its tributaries primarily lie within the Western Bay of Plenty District, and we are actively committed to protecting this taonga. It is a treasure for iwi and hapū, for our communities, and for the land itself.

Whilst we largely support the content of the draft change, we do suggest that some edits be considered to refine the draft prior to notification. These are outlined below. Where direct text changes have been recommended deleted text is shown by ~~strikethrough~~ and added text by underlining.

We appreciate the opportunity to input early into the development of the RPS change, and to work with BOPRC to develop the RPS change.

We are happy to discuss suggested edits further.

Kind regards:

Garry Webber, Mayor Western Bay of Plenty District Council

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

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

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

Email: rps@boprc.govt.nz

Objective ID: A3604404

Section	Page No.	Support/Oppose	Comments	Reasons
2.12.3 Kaituna River	1	Other	<p>The definition for the Kaituna River 'includes all rivers and streams flowing into the Kaituna River and Maketū estuary identified in Map 4ab.'</p> <p>However there are several references to tributaries through out the draft Change. We recommend that these be deleted.</p>	For clarity, consistent terminology should be used. Reference to tributaries should only be made where additional specific mention is necessary.
2.12.4 Significant Issues affecting the Kaituna River 2 Urban growth, climate change, land use intensification and development	2	Oppose in part	We request that this section be broken into two, separating land use issues and climate change issues.	<p>Climate change and land use have different drivers and handled differently.</p> <p>Whilst we acknowledge there is currently a Natural Hazard section in the RPS, this does not necessarily align with the wider implications of climate change on the environment and particularly the Kaituna River.</p>
2.12.4 Significant Issues affecting the Kaituna River 4 Drainage scheme impacts	3	Oppose in part	<p>Amend to:</p> <p>Mahinga kai, ecosystem health and natural character values are being impacted by drainage scheme <u>water body</u> modifications especially in the lower Kaituna River area.</p>	<p>Clarify that the modification of water bodies is the issue, rather than modification of the drainage schemes themselves.</p> <p>It is our understanding that it relates to historical issues from destruction of ecosystems and the need for wetland restoration.</p>

<p>Policy KR 2B: Establishing water quality limits within the Kaituna River</p>	<p>16</p>	<p>Oppose in part</p>	<p>We support the intent of the policy and the recognition of the importance of drinking water sources</p> <p>We request the following amendment to the explanation:</p> <p>The drinking water standards are high across a range of contaminants and it is unrealistic to expect these to be met in all parts of the Kaituna River and its tributaries without water treatment.</p>	<p>The drinking water standards set a very high bar and it is unlikely that any surface water without treatment will meet the standards.</p> <p>Clarity is required so as not to give the impression that surface water is drinkable.</p> <p>Deletion of reference to tributaries as per above.</p>
<p>Policy KR 4B</p>	<p>14</p>	<p>Oppose in part</p>	<p>Amend policy name to:</p> <p>Policy KR 4B: <u>Managing groundwater abstraction in the Kaituna River Catchment for the protection of puna and springs.</u></p>	<p>Groundwater by definition cannot be in a river or its tributaries, as this is surface water. It is therefore the groundwater in the catchment area that is of concern.</p> <p>In discussions with BOPRC staff, it is understood that the intent of the policy is the protection of puna and springs, rather than groundwater takes more generally.</p> <p>Amending the title better describes the policy's intent.</p>

Policy KR 5B	15	Oppose in part	<p>Amend explanation to include reference to farm environment plans.</p> <p>Amend explanation to:</p> <p>A common example of <u>potential</u> best management practice is environmental offsetting.</p>	<p>Project 5 of Te Tini a Tuna involves the development of Farm Environment Plans on agricultural and horticultural properties within the Kaituna catchment.</p> <p>These are an important tool to identify and encourage improved land management practices and should be referenced in this RPS change.</p> <p>Whilst we agree with the principle of environmental offsetting, we do not think it can definitively be called 'best practice'. There is still some debate about its appropriateness as it is still relatively new and often results in net loss because it is very difficult to properly "replace".</p>
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Policy KR 6B	17	Oppose in part	<p>Amend point (a) to:</p> <p>Increasing the quality and extent of remaining wetlands;</p>	<p>The policy should allow for creation of new wetlands, not just those that are remaining.</p> <p>We wish to see wetland restoration and that it be encouraged wider than the remaining original wetlands. Creating or recreating wetlands is an important tool for ecological enhancement.</p> <p>WBOPDC encourages it through protection lot subdivision whereby they can get additional lots if they create a wetland.</p>
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Policy KR 7B	19	Oppose in part	<p>It is suggested that this be split into two policies:</p> <p>Enabling economic development opportunities for iwi and hapu in the Kaituna River</p> <p>And</p> <p>Encourage economic development that enhances the Kaituna River and acknowledges its cultural connections.</p> <p>This may require reconsideration of the associated methods.</p>	<p>As it is currently drafted, there are two concepts raised here –</p> <p>1 - economic opportunities for iwi and hapū,</p> <p>2 – economic development that enhances the Kaituna and acknowledges its cultural connections.</p> <p>The bundling of these concepts together is somewhat confusing. It suggests iwi economic opportunities should only be enabled where they ‘promote greater understanding....or enhance the River’s wellbeing’.</p> <p>There is a lack of clarity as to what is therefore required through the District Plan.</p> <p>One aspect relates to zoning of land and discussions with iwi about future aspirations.</p> <p>The other is regarding ‘sustainable land management practices’ to ensure respect for the Kaituna River.</p>
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Policy KR 8B	19	Other	<p>Request that explanation text (in particlur paragraph 3) of Policy KR 8B is strengthened so BOPRC ensure recreation facilities are enabled and support public access.</p> <p>Amendments to the explanation text could include/recognise non regulatory Te Tini a Tuna projects and the opening up of publicly owned land or purchase of land, as well as district plan provisions.</p>	<p>We would like this strengthened to see all bodies, including the Regional Council, required to ensure recreations facilities are enabled and supportive of public access.</p> <p>BOPRC has ownership of significant riverside areas and assets as part of its Flood Protection and Control Activity. These may provide an opportunity to enable public access, outside of the statutory RMA processes.</p>
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Method KR6	23	Oppose	Delete all	<p>We do not feel that the Regional Policy Statement as a RMA document, is the correct place for this method. We are unaware of similar provisions being used elsewhere.</p> <p>Whilst we do not disagree with the method's intent, it is felt that the RPS is the wrong tool for the job. This is not an RMA issue.</p> <p>It is better implemented through individual Council's procurement strategies and decisions to give effect to Kaituna He Taonga Tuku Iho through other processes (eg. Long Term Plans, Annual Plans, procurement approaches, etc.).</p>
Method 23J	24	Other	Amend implementation responsibility to: <u>District councils, and Regional Council.</u>	<p>Stormwater in rural areas is often managed by BOPRC, when located in rural areas, under the Flood Protection and Control Activity. This should be reflected in the implementation responsibilities.</p>

<p>4.2 Objectives, anticipated environmental results and monitoring indicators</p> <p>Objective 44</p> <p>Monitoring indicators</p>	<p>27</p>	<p>Other</p>	<p>Amend monitoring indicator text to be clear that this refers to the land use capability classification:</p> <p>Existing use and new land development aligns with that land's its land use capability <u>classification</u>.</p> <p>Further consideration is necessary as to how industrial/commercial/residential is considered here.</p> <p>Further monitoring indicators could be considered that line more explicitly with the objective and 'best management practices'. Potentially reference to Farm Management Plans may be beneficial here and would link to project 5 in Te Tini a Tuna.</p>	<p>Rewording is necessary for clarity.</p> <p>Consideration is also required as the LUC does not include consideration of industrial, commercial or residential.</p> <p>The indicators should reflect the objective more explicitly.</p>
<p>4.2 Objectives, anticipated environmental results and monitoring indicators</p> <p>Objective 45</p> <p>AER and Monitoring Indicators</p>	<p>26/27</p>	<p>Other</p>	<p>Request additional AER and monitoring indicator linked to protection of the high quality aquatic ecosystems in the upper and mid catchment.</p>	<p>We are concerned that the upper and mid catchment are somewhat missing in this document. With only one mention of the upper catchment (and then in regards to rafting/kayaking only).</p> <p>We acknowledge that Policy MN 2B sets the policy framework for giving particular consideration to protecting significant indigenous habitats and ecosystems. However, we feel an indicator to demonstrate how this is working for the Kaituna is necessary.</p>

<p>4.2 Objectives, anticipated environmental results and monitoring indicators</p> <p>Objective 46</p> <p>AER and Monitoring Indicators</p>	<p>28</p>	<p>Oppose in part</p>	<p>Amend to:</p> <p>The level <u>quality and quantity</u> of public access to and along rivers is improved.</p> <p>Addition of an associated monitoring indicator is suggested, relating to the quality of public access.</p>	<p>The amendments proposed ensure that quantity and quality of access is considered.</p>
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