

Section 32 report: Natural heritage

for the Proposed Natural Resources Plan for the Wellington Region



greater WELLINGTON

REGIONAL COUNCIL

Te Pane Matua Taiao



Issues and Evaluation Report



Section 32 report: Natural heritage

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1. Introduction

This section 32 report is an analysis of the appropriateness of the proposed objectives, policies and methods in the Proposed Natural Resources Plan for the Wellington Region (referred to as the proposed Plan) that addresses natural heritage in the coastal marine area (CMA). This report is guided by the requirements of section 32 of the Resource Management Act 1991 (RMA).

The CMA is the area below mean high water springs out to 12 nautical miles off the coast. In general, the mean high water spring is the upper extent of the beach that gets wet each day.

The Wellington Regional Council (referred to as the WRC) is responsible for controlling a range of activities in the CMA. The CMA is defined in section 2 of the RMA as:

the foreshore, seabed, and coastal water, and the air space above the water—

(a) of which the seaward boundary is the outer limits of the territorial sea:

(b) of which the landward boundary is the line of mean high water springs, except that where that line crosses a river, the landward boundary at that point shall be whichever is the lesser of—

(i) 1 kilometre upstream from the mouth of the river; or

(ii) the point upstream that is calculated by multiplying the width of the river mouth by 5.

2. Scope

This section 32 report covers some specific natural heritage values that are found in the CMA and that are appreciated by the community including:

- Natural character (addressed in Objective O17)
- Outstanding natural features and landscapes (addressed in Objective O32)
- Significant geological features (addressed in Objective O36)
- Significant surf breaks (addressed in Objective O37)
- Special amenity landscapes (addressed in Objective O38)

There are three other section 32 reports that directly relate to the coast, which should be read together as one package to understand the context and approach for the evaluation undertaken for the development of the proposed Plan.

The three other section 32 reports are:

- Management of the coastal marine area
- Activities in the coastal marine area
- Recreation, public access and public open space

2.1 Freshwater and coast

Objectives O17 and O32 address natural character and outstanding natural features and landscapes and special amenity landscapes in both the CMA and in the beds of lakes and rivers. The appropriateness of these objectives is discussed in this section 32 report, however the provisions to achieve these objectives in freshwater are addressed in the section 32 report ‘Beds of lakes and rivers’.

Table 1 below shows which of the proposed objectives are assessed in the ‘coastal’ section 32 reports.

Table 1: Proposed objectives and the section 32 report they are assessed in

Proposed objective	Section 32 report
Objective O17: Natural character Objective O32: Outstanding natural features and landscapes Objective O36: Significant geological features Objective O37: Significant surf breaks Objective O38: Special amenity landscapes	Natural heritage
Objective O9: Recreational values Objective O10: Public access Objective O55 – Public open space	Recreation, public access and public open space
Objective O53: Functional need Objective O54: Efficient use of space Objective O56: New development Objective O57: Lambton Harbour Area Objective O59: Safe use and passage	Management of the coastal marine area
Objective O19: Natural processes Objective O58: Noise	Activities in the coastal marine area

There are a number of other section 32 reports that cover specific resource management topics which are also relevant to the coast and should be read in conjunction with this report:

- Ki uta ki tai – mountains to the sea
- Beneficial use and development
- Historic heritage
- Air quality management
- Māori values
- Wetlands
- Discharges to water
- Aquatic ecosystems

- Natural hazards
- Water quality

2.2 Report methodology

Section 32(2) of the RMA states:

(2) An assessment under subsection (1)(b)(ii) must—

(a) identify and assess the benefits and costs of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the provisions, including the opportunities for—

(i) economic growth that are anticipated to be provided or reduced; and

(ii) employment that are anticipated to be provided or reduced; and

(b) if practicable, quantify the benefits and costs referred to in paragraph (a); and

(c) assess the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the provisions

To fulfil the requirement of section 32(2) of the RMA, the report identifies and assesses the benefits and costs of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the provisions.

In accordance with section 32(2), the analysis identifies the opportunities for economic growth that are anticipated to be provided or reduced and the employment that is anticipated to be provided or reduced.

In addition, the analysis, where practicable, quantifies the benefits and costs and assesses the risk of acting or not acting if there is uncertain or insufficient information.

The structure of the report is shown below:

- *Resource management issues:* An outline of the main issues associated with natural heritage that were identified by the community (section 3 of this report)
- *Regulatory and policy context:* identification of relevant national and regional legislation and policy direction (section 4 of this report)
- *Appropriateness of the proposed objectives:* An evaluation of the extent to which the proposed objectives are the most appropriate way to achieve the purpose of the RMA, as required by section 32(1)(a) (section 5 of this report)

- *Efficiency and effectiveness of the proposed policies, rules and other methods:* An assessment of the efficiency and effectiveness of the provisions as to whether they are the most appropriate way to achieve the objectives, in accordance with section 32(1)(b) and section 32(2) (section 6 of this report).

3. Resource management issues

The WRC began region-wide engagement with the community in 2010 to identify the views of the community regarding natural resource management and to help define the issues for the regional plan review (Parminter, 2011). This involved engagement with iwi partner organisations, the general public, agencies and organisations with interests in resource management, resource users, school children, developers and policy makers.

From the region-wide engagement, four significant regional resource management issues were identified relating to natural heritage in the CMA. The relevance and significance of these issues is discussed below.

3.1 Issue 1.15: Outstanding natural features and landscapes

Degradation, modification and destruction of outstanding natural features and landscapes result in the loss of values associated with those landscapes and features.

Within the Wellington Region, there are landscapes which are highly valued by the regional community particularly those which are regarded as outstanding natural landscapes and features. The protection of these landscapes is a matter of national importance. The New Zealand Coastal Policy Statement 2010 identifies as a key issue the ‘loss of natural character, landscape values and wild or scenic areas along extensive areas of the coast, particularly in areas closer to population centres or accessible for rural residential development’.

Landscape change is inevitable, even without human action, however it is the degree and intensity of change caused by human activities which is of concern. Change is resulting from pressures on landscapes, such as subdivision into smaller land holdings for rural residential and residential developments, development of infrastructure including electricity generation activities, roading projects and services such as marinas and forestry operations. The effects on landscape are primarily visual but the impact can extend beyond scenic appeal. Landscape value can be affected by earthworks and soil disturbance, changes in the form and appearance of waterbodies and disturbance from development in the CMA

3.2 Issue 1.16: Special amenity landscapes

Inappropriate use and development of significant amenity landscapes result in a loss of amenity values associated with those landscapes.

The Wellington Region has a variety of distinctive landscapes, such as wild coasts, sheltered harbours, rolling pasture and coastal dunes, which are not considered as outstanding natural landscapes, but which are widely recognised and valued by the community. As with the more exceptional landscapes, these

landscapes are under pressure from changes and new types and patterns of land use which can lead to a gradual loss of the values associated with them.

3.3 Issue 6.4: Natural character

Activities and structures in the coastal marine area continue to degrade the natural character of the coastal environment.

The natural character of the coastal environment of the Wellington Region is complex and varies from area to area. Much of the original natural character of the region's coast has been, and continues to be, adversely affected by the cumulative effects of human activities such as subdivision, changes in land use, and the placement of structures. The natural character of the coast is being degraded through incremental loss and damage to coastal ecosystems including estuaries and salt-marshes, e.g. the Waikanae estuary, Pauatahanui Inlet, and Motuwaireka Stream estuary at Riversdale. It has largely been lost in the built-up area of Wellington Harbour (Port Nicholson) extending from Kaiwharawhara to the airport, in the reclaimed and highly developed Wellington City area, and around the Onepoto Arm of Te Awarua-o-Porirua Harbour. Areas that still have high natural character are under increasing pressure for development, particularly along the Kāpiti and Wairarapa coasts and Pauatahanui Inlet.

3.4 Issue 6.7: Motor vehicles on beaches

The use of vehicles on the foreshore can adversely affect the coastal environment.

Vehicles can have adverse effects on both the coastal environment (e.g. in sensitive environments such as the fossilised forest at Titahi Bay beach) and on people's enjoyment of the coast (e.g. vehicles coming into conflict with people). However, it is acknowledged that in some cases, vehicles need to access the foreshore for certain activities such as boat launching and for rescue operations.

4. Regulatory and policy context

4.1 National level

4.1.1 Resource Management Act 1991

Section 6 of the Resource Management Act 1991 (RMA) is a list of matters of national importance and includes (a) the preservation of natural character and (b) outstanding natural features and landscapes and the protection of them from inappropriate subdivision, use and development. Section 7 includes a list of other matters to have particular regard to when managing use and development and protection of natural and physical resources. This includes (c) the maintenance and enhancement of amenity values and (g) any finite characteristics of natural and physical resources. Significant geological features, significant surf breaks and special amenity landscapes would all fall under these matters.

4.1.2 New Zealand Coastal Policy Statement 2010

A national policy statement is an instrument available under the RMA to help local government decide how competing national benefits and local costs should be balanced. The WRC is required to give effect to relevant provisions of national policy statements in planning documents and resource consent authorities must have regard to relevant provisions when considering resource consent applications.

Since the adoption of the Regional Coastal Plan (presented in section 4.2.2), national strategic guidance on the development and use of the CMA has become more focused with the emergence of the New Zealand Coastal Policy Statement 2010 (NZCPS). The NZCPS contains more explicit and specific direction to councils on strategic and spatial planning than previous guidance. It aims to support the development of plans to give developers and communities more certainty about where new use and development will be appropriate, where it is likely to require very careful consideration, and where it should not happen. Key terms relating to the NZCPS may be explained as follows:

a) Natural character

The NZCPS supports the protection of natural character in the coastal environment. Objective 2 seeks the preservation of the natural character of the coastal environment.

To achieve Objective 2, Policy 13 seeks the avoidance of adverse effects of activities on outstanding natural character and the avoidance of significance effects and the avoidance, remediation or mitigation of adverse effects on natural character in all other areas of the coastal environment. Policy 13 also seeks that natural character is assessed in the coastal environment by mapping or otherwise identifying at least areas of high natural character, and requires provisions in plans to preserve it.

b) Outstanding natural features and landscapes

The NZCPS in Objective 2 also seeks the protection of natural features and landscapes through recognition of characteristics and qualities of natural features and landscapes, identifying areas where certain development would be inappropriate and encouraging restoration of the coastal environment. This is done by directing regional councils and territorial authorities to establish objectives, policies and rules to manage adverse effects.

Policy 15 seeks the avoidance of adverse effects on outstanding natural features and landscapes and the avoidance of significance effects and avoidance, remediation or mitigation of adverse effects on other natural features and landscapes in the coastal environment. Policy 15 also seeks the identification and assessment of natural features and landscapes and includes a number of matters given regard to when making this assessment.

c) Significant geological features

Policy 13 of the NZCPS which seeks the protection of natural character includes recognition that natural character may include (b) biological, ecological, geological and geomorphological aspects. Policy 15 includes as a matter to consider (c)(i) natural science factors including geological, topographical, ecological and dynamic components when managing adverse effects on natural features and landscapes.

d) Significant surf breaks

While Policy 16 seeks the protection of surf breaks of national significance, the NZCPS does not specify regionally significant surf breaks. Instead, in order to preserve natural character, Policy 13 provides matters to consider when assessing natural character including (c) natural landforms such as headlands, peninsulas, cliffs, dunes, wetlands, reefs, freshwater springs and surf breaks.

4.1.3 The Marine and Coastal Area (Takutai Moana) Act 2011

The Marine and Coastal Area (Takutai Moana) Act (MCCA) 2011 replaced the Foreshore and Seabed Act 2004. The MCCA takes account of the Treaty of Waitangi of 1840 through the recognition and promotion of the exercise of customary interests of Māori in the common marine and coastal area.

The MCCA introduces a new term being the “common marine and coastal area”. This is the area between mean high water springs (MHWS) and out to 12 nautical miles excluding private land titles and certain conservation areas.

Through the MCCA, whanau, hapū and iwi can seek recognition and protection of longstanding customary interests in the form of a protected customary right or a customary marine title. Key terms relating to the MCCA may be explained as follows:

a) Protected customary right

A protected customary right must have been exercised since 1840 and must currently be exercised and holders have veto rights on adverse activities affecting the customary right. A customary marine title must be held by the applicant group in accordance with tikanga and used exclusively and continuously since 1840.

b) Customary marine title

A customary marine title group can prepare a planning document setting out the strategy and approach for the management of that area and it must be taken into account in decision and plan-making. Holders of a customary marine title have veto powers over some activities and there are listed ‘accommodated activities’ which can continue to be carried out in the common marine and coastal area despite marine title being recognised. Free public access is also guaranteed.

A planning document may be prepared by a customary marine title group to identify relevant regulatory and management issues related to the customary marine title area and include objectives and policies to achieve.

c) Giving effect to the MCCA

A regional council must recognise and provide for and take into account any matters identified in the planning document that relate to resource management issues within its functions under the RMA. For the proposed Plan, when a resource consent application is assessed, a regional council must assess whether the activity sought would directly affect, wholly or in part, the area to which the planning document applies. A regional council must have regard to any matters identified in the planning document that relate to resource management issues within its functions under the RMA.

The “common marine and coastal area” has also been referred to in the proposed Plan where appropriate.

4.1.4 Marine Reserves Act 1971

The Marine Reserves Act 1971 provides for the creation of marine reserves for the scientific study of marine life where their continued preservation is in the national interest.

For the proposed Plan, Taputeranga Marine Reserve and Kāpiti Marine Reserve are identified and scheduled as sites of significant indigenous biodiversity and with this comes more stringent rules regarding activities that could have adverse effects. There are also notes within some rules describing that natural material is not to be removed from Taputeranga Marine Reserve unless it comes under the Memorandum of Understanding that is held between Wellington City Council and the Department of Conservation.

The management of marine reserves are also guided by conservation management strategies and conservation management plans under the Marine Reserves Act 1971 the Conservation Act 1987 (discussed below).

Under section 66(2) of the RMA regional plans shall have regard to any management plans and strategies prepared under other Acts.

4.1.5 Conservation Act 1987

The Conservation Act 1987 promotes the conservation of New Zealand’s natural and historic resources, and for that purposes establishes the Department of Conservation.

In terms of relevance for this report, the RMA requires that any changes to regional plans have regard to any management plans and strategies prepared under other Acts (which include the Conservation Act) which includes marine reserves.

4.2 Regional level

4.2.1 Regional Policy Statement for the Wellington Region 2013

The Regional Policy Statement for the Wellington Region 2013 (RPS) identifies the significant regional resource management issues facing the region's coastal environment and contains policies providing specific direction to the WRC and to city and district councils as to how these issues should be addressed in the regional and district plans. The proposed Plan must give effect to the RPS. The RPS provides direction on a number of resource management issues which also guide the management direction of the proposed Plan. Key terms relating to the RPS may be explained as follows:

a) Natural character

Adverse effects resulting from subdivision, use and development on natural character in the coastal environment was identified as a regionally significant issue in the RPS. Objective 4 aims to protect natural character in the coastal environment from the adverse effects of inappropriate subdivision, use and development. Objective 5 seeks to restore and rehabilitate areas of the coastal environment where natural character has been degraded.

Policy 3 requires district and regional plans to protect high natural character in the coastal environment by determining what would be inappropriate activities on this land, district and regional councils. This can be achieved by assessing land in the coastal environment (including in the CMA) to ascertain which areas have high natural character. The policy lists the matters to be considered when assessing natural character.

Policy 35 provides guidance on preserving natural character when assessing resource consents, notice of requirements or when undertaking a change, variation or review of a district or regional plan. Policy 36 aims to manage effects on natural character in the coastal environment and provides a range of matters to give particular regard when determining the adverse effect and its significance.

Policies 35 and 36 provide an interim assessment framework for councils and consent applicants prior to the identification and protection of natural character and the determination of high natural character in accordance with Policy 3. Method 7 in the RPS is to provide information about high natural character in the coastal environment.

b) Outstanding natural features and landscapes

The RPS identifies the inappropriate modification of the characteristics of outstanding natural features and landscapes that make them outstanding and natural, as a significant regional management issue for the region. Objective 17 in the RPS aims to identify and protect the region's outstanding natural features and landscapes from inappropriate subdivision, use and development. Policies 25 and 26 seek the identification and protection of outstanding natural features and landscapes in district and regional plans as well as the management of effects on outstanding natural features and landscapes in Policy 50. To achieve this, the RPS directs district and regional councils to engage with tangata

whenua, landowners and the community in the identification and protection of outstanding natural features and landscapes in the region.

c) Significant geological features

The RPS includes Policy 25 which seeks to identify outstanding natural features and landscapes and includes a number of matters in order to identify outstanding natural features and landscapes such as (a) natural science values which relate to the geological, ecological, topographical and natural process components of the natural features or landscape.

When resource consents or plan changes are assessed, Policy 35 requires that particular regard is given to preserving the natural character of the coastal environment by (g) protecting scientific and geological features from inappropriate subdivision, use and development.

d) Significant surf breaks

The RPS does not mention significant surf breaks; instead surf breaks are addressed as part of recreational values. Objective 3 aims to protect habitats and features in the coastal environment that have significant values including recreational and landscape values from inappropriate subdivision, use and development.

Policy 35 seeks to preserve natural character in the coastal environment by (c) maintaining or enhancing amenity – such as open space and scenic values – and opportunities for recreation and the enjoyment of the coast by the public.

e) Special amenity landscapes

Objective 18 seeks that the region's special amenity landscapes are identified and those landscape values that contribute to amenity and the quality of the environment are maintained or enhanced. This is to be achieved through Policy 27 which suggests that district and regional plans may identify special amenity landscapes by using the factors listed in Policy 25 (identifying outstanding natural features and landscapes). Policy 28 further requires that special amenity landscapes are managed once they have been identified in accordance with Policy 27 in order to maintain or enhance their landscape values in the context of the continuation of (a) existing land uses; (b) predominant existing land uses; and (c) other lawfully established activities. Method 32 seeks that engagement with tangata whenua, stakeholders, landowners and the community is carried out to identify and protect significant values including by managing the values of special amenity landscapes.

4.2.2 Regional Coastal Plan

The operative Regional Coastal Plan for the Wellington Region (Coastal Plan) does cover a number of the resource management issues still of focus for the proposed Plan. Key factors of consideration are as follows.

a) Natural character

The Coastal Plan includes an objective that aims to preserve the natural character of the CMA and protect it from inappropriate use and development. Policy 4.2.2 seeks the recognition that some parts of the CMA retain natural character and other areas have been compromised, and encourages appropriate new development in compromised areas. There are also specific policies on protecting natural character from the adverse effects of structures (6.2.2) as well as other activities in the CMA, policies that address the situation where if there are adverse effects, they can be satisfactorily mitigated or remedied.

b) Outstanding natural features and landscapes

The Coastal Plan does not include any issues, objectives, policies on natural features and landscapes except from a couple of references to some areas of important conservation value having outstanding natural and landscape values. However, there is an anticipated environmental result that outstanding natural features and important cultural and historic features are protected.

c) Significant geological features

The Coastal Plan includes Appendix 2 which is a list of “areas of significant conservation value”. Some of these areas have been identified as containing significant geological values e.g. Kāpiti Marine Reserve and Pauatahanui Inlet. Appendix 3 is a list of “areas with important conservation value” and identifies that areas such as Wairaka Rock and Turakirae Head also have important geological values.

Objective 4.1.6 of the Coastal Plan seeks the protection of important ecosystems and other natural and physical resources in and adjacent to the CMA from inappropriate use and development. Policy 4.2.10 seeks to achieve this objective by protecting sensitive, rare, or unusual habitats and natural and physical resources and ecosystems from the adverse effects of use and development. In the explanation of this policy, it highlights that values of the areas identified as either an area of significant or important conservation value shall be protected.

d) Significant surf breaks

The Coastal Plan does not specifically provide for surf breaks but if necessary, the policies on recreational values would be used in the assessment. Policy 4.2.20 seeks the recognition of the importance of the coastal environment to recreational activities. Policy 6.2.2 also seeks the avoidance of use or development of structures in the CMA where there will be adverse effects on recreational values.

e) Special amenity landscapes

The Coastal Plan does not address special amenity landscapes, but amenity values are included in Objective 4.1.9 in that amenity values in the CMA are maintained and enhanced. Policy 4.2.19 also seeks the recognition of the importance of amenity values in the CMA, and to avoid, where practicable, any

adverse effects on these values, where avoidance is not practicable, to remedy, or mitigate the adverse effects.

5. Appropriateness of the proposed objectives

Section 32(1)(a) requires that an evaluation report must “examine the extent to which the objectives of the proposal being evaluated are the most appropriate way to achieve the purpose of the Act”.

Section 32(1)(b) requires that the proposed provisions (policies, rules and other methods) to achieve the objectives be examined by:

- Identifying other reasonably practicable options for achieving the objectives
- Assessing the efficiency and effectiveness of the provisions in achieving the objectives; and
- Summarising the reasons for deciding on the provisions

5.1 Proposed objectives

A brief description of the five proposed objectives specifically analysed for this topic is provided below. Tables A1 to A4 in the Appendix also provide an assessment of the appropriateness of the proposed objectives against section 32(1)(a) of the RMA.

There are other objectives that the provisions for activities in the CMA seek to achieve. The tables in Section 6 list these supporting objectives. For an analysis of these objectives, refer to other section 32 reports listed in section 2 above.

To evaluate the appropriateness section 32 provides four criteria:

1. Relevance – is the objective related to addressing a resource management issue? Will it achieve one or more aspects of the purpose and principles of the RMA?
2. Usefulness – will the objective guide decision-making? Does it meet sound principles for writing objectives?
3. Reasonableness – what is the extent of the regulatory impact imposed on individuals, businesses or the wider community?
4. Achievability – can the objective be achieved with tools and resources available, or likely to be available, to the local authority?

5.1.1 Objective O17

The natural character of the coastal marine area, rivers and lakes and their margins and natural wetlands is preserved and protected from inappropriate use and development.

This objective is relevant as it addresses issue 6.4 identified in the early stages of proposed Plan development and it is useful in that it gives effect to the RMA

and RPS. It also provides better certainty to resource users and the WRC on what is anticipated in terms of assessments on these natural and physical resources. While there may be some costs added to resource consent applications, these are expected to be minor when compared to the social benefits to be gained from protecting these resources. It will be achievable in that it can be achieved over the life of the proposed Plan and beyond and is measurable.

This objective intends to protect natural character in different environments from activities which can affect the values and attributes of natural character. This objective responds to the issue of activities continuing to degrade natural character in the coastal environment.

As shown in Table A3 in the Appendix, proposed Objective O17 is therefore appropriate to achieve the purpose of the RMA and give effect to the NZCPS.

5.1.2 Objective O32

Outstanding natural features and landscapes are protected from inappropriate use and development.

This objective is relevant as it addresses issue 1.15 identified in the early stages of proposed plan development and it is useful in that it gives effect to both the RMA and NZCPS. It also provides better certainty to resource users and the WRC on what is anticipated in terms of assessments on these natural and physical resources. While there may be some costs added to resource consent applications, these are expected to be minor when compared to the social benefits to be gained from protecting these resources. It will be achievable in that it can be achieved over the life of the proposed Plan and beyond and is measurable.

As shown in Table A4 in the Appendix, proposed Objective O32 is therefore appropriate to achieve the purpose of the RMA and give effect to the NZCPS.

5.1.3 Objective O36

Significant geological features in the coastal marine area are protected.

This objective is relevant as it seeks to protect significant geological features in the CMA that have been identified in the proposed Plan. It is useful in that it highlights the impacts that activities can have on significant geological features which can affect values appreciated by the community in the CMA. These values include natural character, biological ecosystems and recreational values as well as mana whenua values. For example disturbance of significant geological features can lead to their permanent damage or destruction.

This objective is also useful in that it implements policies in the NZCPS, including Policies 13 and 15 which seek to protect natural character and natural features and landscapes of which geological features are a component. This objective is reasonable as it does not infer significant costs on any party with significant geological features identified below MHWS and not on private land. The objective is also achievable as it does not have any set timeframes but will be achieved over the life of the proposed Plan and beyond.

As shown in Table A1 in the Appendix, proposed Objective O36 is therefore appropriate to achieve the purpose of the RMA and give effect to the NZCPS.

5.1.4 Objective O37

Significant surf breaks are protected from inappropriate use and development.

Significant surf breaks in the region have been identified and included in the proposed Plan. Surf breaks are both a recreational and natural feature of the CMA. This objective is relevant as it addresses Policy 13 of the NZCPS. It is useful as it clearly outlines what is expected and provides certainty about what is expected in terms of protecting this natural resource. It is reasonable as it does not infer significant costs and the social benefits are considered to outweigh these. Achieving this objective can be done by carrying out assessments on the quality of significant surf breaks over time and it is expected that this can be done within the life of the proposed Plan.

As shown in Table A2 in the Appendix, proposed Objective O37 is therefore appropriate to achieve the purpose of the RMA and give effect to the NZCPS.

5.1.5 Objective O38

Identified special amenity landscapes are maintained or enhanced.

This objective is relevant as it addresses Issue 1.16 identified in the early stages of proposed plan development and it is useful in that it gives effect to the RPS. It also provides better certainty to resource users and the WRC on what is anticipated in terms of assessments on these natural and physical resources. While there may be some costs added to resource consent applications, these are expected to be minor when compared to the social benefits to be gained from protecting these resources. It will be achievable in that it can be achieved over the life of the proposed Plan and beyond and is measurable.

This objective will only be able to be met when outstanding natural features and landscapes and special amenity landscapes have been identified.

As shown in Table A4 in the Appendix, proposed Objective O38 is therefore appropriate to achieve the purpose of the RMA and give effect to the NZCPS.

5.2 Conclusion for the appropriateness of the proposed objectives

The assessment of the operative objectives in the Appendix shows that these objectives are not as **relevant** or as **useful** in that:

- They do not give effect to the RMA, NZCPS and RPS, and
- They do not adequately address outstanding natural features and landscapes, significant surf breaks or significant geological features, and

The proposed objectives seeks to address the shortcomings of having limited or inadequate provisions, and create a clear and efficient policy tool with which decision makers and plan users can assess proposed activities that may affect natural heritage in the CMA. The assessment of the proposed objectives in the Appendix shows the following:

The proposed objectives are **relevant** as they:

1. give effect to the RMA, NZCPS and RPS; and
2. use language and terminology that is consistent with the RMA, NZCPS and RPS.

The proposed objectives are **useful** in achieving the purpose of the RMA as they:

1. are consistent with the guidance and national direction provided in the NZCPS and RPS; and
2. provide decision-makers with a suite of assessment tools that will enable consistent and comprehensive consideration of the full range of environmental effects on natural heritage

The assessment summarised in the Appendix also shows that the proposed objectives are more efficient and comprehensive than the operative objectives. Objectives O17, O32, O36, O37 and O38 are more **relevant** and **useful** in achieving the purpose of the RMA, and it is proposed that they are included in the proposed Plan.

6. Efficiency and effectiveness of the proposed policies, rules and other methods

The proposed policies and methods are assessed in accordance with sections 32(1)(b) and section 32(2) of the RMA as to whether they are the most appropriate way to achieve the objectives in the proposed Plan.

This section provides an assessment of the effectiveness and efficiency of some of the proposed provisions in the management of natural heritage. These are summarised in the Appendix (Tables A5 to A8). These assessments are based on information provided through comments on the draft Natural Resources Plan, industry stakeholders, consultants, and other information obtained as part of the section 32 evaluation.

6.1 Natural character

In order to give effect to Policy 13 of the NZCPS, the proposed Plan needs to include provisions to identify and protect high natural character in the coastal environment.

RPS policies seek the protection of high natural character, the preservation of natural character and the management of effects on natural character. Policy 3 in the RPS provides a range of matters to use in order to assess natural character for regional and district plans and to determine the level of modification to the coastal environment. Some territorial authorities have identified high natural character as part of their district plan review (e.g. Kāpiti Coast District Council).

Table 2 below shows some of the proposed provisions that will contribute to achieving Objective O17. It should also be noted that these are not all the relevant provisions, due to the integrated nature of the proposed Plan.

Table 2: Provisions to achieve Objective O17

Objective: O17: The natural character of the coastal marine area, rivers, lakes and their margins and natural wetlands is preserved and protected from inappropriate use and development.	
Policies	<p>Policy P24: Outstanding natural character</p> <p>Policy P25: Natural character</p> <p>Supporting policies</p> <p>Policy P2: Cross-boundary matters</p> <p>Policy P4: Minimising adverse effects</p> <p>Policy P9: Beneficial activities</p> <p>Policy P12: Benefits of regionally significant infrastructure and renewable energy generation facilities</p> <p>Policy P22: Ecosystem value of estuaries</p> <p>Policy P26: Natural processes</p> <p>Policy P31: Aquatic ecosystem health and mahinga kai</p> <p>Policy P40: Ecosystems and habitats with significant indigenous biodiversity values</p> <p>Policy P44: Protection and restoration of sites with significant mana whenua values</p> <p>Policy P134: Public open space values and visual amenity</p> <p>Policy P139: Seawalls</p> <p>Policy P140: Boatshed Management Areas</p> <p>Policy P145: Reclamation, drainage and destruction</p>
Rules	<p>Rule R166: Seawalls outside sites of significance</p> <p>Rule R181: New swing moorings outside Mooring Areas</p> <p>Rule R179: New boatsheds outside Boatshed Management Areas</p> <p>Rule R215: Reclamation and drainage</p>
Methods	<p>Method M22: Integrated management of the coast</p> <p>Method M24: Outstanding natural features and landscapes and high natural character</p>

6.1.1 Operative provisions

The Coastal Plan includes Objective 4.1.5 which seeks that natural character of the CMA is preserved and protected from inappropriate use and development. The policies to achieve this objective include Policy 4.2.2 which seeks a recognition of those parts of the CMA that retain natural character versus areas that have been compromised, and to encourage appropriate new development in the compromised areas.

Policy 4.2.35 also promotes placing conditions on resource consents to avoid, remedy or mitigate any adverse effects on natural character. Policy 6.2.2 provides for activities which involve damage or disturbance where the adverse effects are short term, reversible or minor. It states that in order for an activity to be deemed to have minor adverse effects that the activity will not have any adverse effects on natural character. Policy 6.2.2 provides direction on the developments of structures and to not allow them where there will be significant adverse effects on natural character. There are no specific rules for

natural character in the Coastal Plan as no identification work had been completed.

6.1.2 The proposed Plan

The proposed Plan includes Objective O17 which seeks that the natural character of the CMA, rivers, lakes and their margins and natural wetlands is preserved and protected from inappropriate use and development. Following this, there are two policies included to achieve this objective. Policy P24 seeks the avoidance of adverse effects on outstanding natural character and provides a number of other matters to use in order to preserve outstanding natural character. Policy P25 provides guidance on how to avoid significant adverse effects arising from use and development on natural character in the CMA and in the beds of lakes and rivers and promotes the avoidance, remedy or mitigation of other adverse effects.

For the proposed Plan, an assessment of natural character in areas of regional council jurisdiction (e.g. beds of lakes and rivers and in the CMA) had not yet been undertaken at the time of writing. Instead, Policies P24 and P25 along with other objectives and policies in the proposed Plan such as those on managing water quality, reclamation, significant surf breaks, geological features, recreational values and public open space will all contribute to protecting natural character in the CMA and in the beds of lakes and rivers. As shown in Method M24, it is the WRC's intention to carry out some identification of natural character in the CMA with territorial authorities in the near future which could be implemented as a change to the proposed Plan.

There are no direct rules related to areas of natural character in the proposed Plan as the identification work has not occurred, instead policies on protecting natural character are provided and would be triggered in considerations relating to discretionary and non-complying activities in the CMA. Other rules in the proposed Plan seek to limit adverse effects on natural character in the CMA such as discharges and new structures.

As discussed above, in order for applicants to determine the effects of their activities on natural character there are also consideration policies in the RPS which need to be given effect to. These guide decision-making for resource consents such as direction on how to preserve natural character with criteria provided to determine whether activities inappropriately affect natural character.

Continuing with the status quo and not undertaking work around identifying high natural character and engagement programmes and policy development, will incur cost savings for the WRC. However, the status quo approach in the Coastal Plan provisions do not adequately address the requirements in Policy 13(1)(c) of the NZCPS in terms of mapping or otherwise identifying "at least areas of high natural character" in the CMA. The costs of continuing with the status quo is potential challenge from key stakeholders in that the WRC is not giving effect to national level policy direction. This could lead to poor environmental, social, economic and cultural outcomes at a cost of the protection of natural character which is a value highly regarded by the community. Therefore the status quo option is not useful or effective.

6.2 Outstanding natural features and landscapes and special amenity landscapes

The NZCPS in Objective 2 seeks the protection of natural features and landscapes through recognition of characteristics and qualities of natural features and landscapes, identifying areas where specified types of development would be inappropriate and encouraging restoration of the coastal environment.

NZCPS Policy 15 seeks the avoidance of adverse effects on outstanding natural features and landscapes and the avoidance of significance effects and avoidance, remediation or mitigation of adverse effects on other natural features and landscapes in the coastal environment. This policy also seeks the identification and assessment of natural features and landscapes and includes a number of matters given regard to when making this assessment.

The RPS Policies 25 and 26 seek the identification and protection of outstanding natural features and landscapes in district and regional plans as well as the management of effects on outstanding natural features and landscapes in Policy 50. To achieve this, the RPS directs district and regional council's to engage with tangata whenua, landowners and the community in the identification and protection of outstanding natural features and landscapes in the region.

For special amenity landscapes, Policy 27 suggests that district and regional plans may identify special amenity landscapes by using the factors listed in Policy 25 (identifying outstanding natural features and landscapes). Policy 28 further requires that special amenity landscapes are managed once they have been identified in accordance with Policy 27 in order to maintain or enhance their landscape values in the context of the continuation of (a) existing land uses, (b) predominant existing land uses and (c) other lawfully established activities.

Table 3 below shows some of the proposed provisions that will contribute to achieving Objectives O32 and O38. It should also be noted that these are not all the relevant provisions, due to the integrated nature of the proposed Plan.

Table 3: Provisions to achieve Objectives O32 and O38

Objective O32: Outstanding natural features and landscapes are protected from inappropriate use and development.	
Objective O38: Identified special amenity landscape values are maintained or enhanced.	
Policies	<p>Policy P48: Natural features and landscapes and special amenity landscapes</p> <p>Policy P49: Use and development adjacent to outstanding natural features and landscapes and special amenity landscapes</p> <p>Supporting policies</p> <p>Policy P2: Cross-boundary matters</p> <p>Policy P4: Minimising adverse effects</p> <p>Policy P9: Beneficial activities</p> <p>Policy P12: Benefits of regionally significant infrastructure and renewable energy generation facilities</p> <p>Policy P26: Natural processes</p>

	Policy P31: Aquatic ecosystem health and mahinga kai Policy P40: Ecosystems and habitats with significant indigenous biodiversity values Policy P44: Protection and restoration of sites with significant mana whenua values Policy P134: Public open space values and visual amenity Policy P145: Reclamation, drainage and destruction
Rules	Rule R181: New swing moorings outside Mooring Areas Rule R179: New boatsheds outside Boatshed Management Areas Rule R215: Reclamation and drainage
Methods	Method M22: Integrated management of the coast Method M24: Outstanding natural features and landscapes and high natural character

6.2.1 Operative provisions

The Coastal Plan makes only limited provision for landscape values. Taputeranga Island, Honeycomb Rock, Kahau Rocks and Castlepoint are loosely identified as having some landscape value in Appendices 2 and 3. The most relevant objective in the Coastal Plan in terms of landscape values is Objective 4.1.9 which seeks that amenity values in the CMA are maintained and enhanced. Policy 4.2.19 then seeks the recognition of the importance of amenity values in the CMA, and to avoid, where practicable, any adverse effects on these values.

6.2.2 The proposed Plan

The proposed Plan includes Objective O32 which seeks that outstanding natural features and landscapes are protected from inappropriate use and development and Objective O38 which seeks that identified special amenity landscape values are maintained or enhanced. The proposed Plan also includes two related policies to achieve these objectives including P48 which seeks the protection of natural features and landscapes (including seascapes) of the CMA, rivers, lakes and their margins and natural wetlands from inappropriate use and development. This is to be achieved by avoiding adverse effects of activities on outstanding natural features and landscapes and avoiding significant adverse effects and avoiding, remedying or mitigating other adverse effects on natural features and landscapes. Policy P49 provides guidance on the management of the CMA adjacent to outstanding natural features and landscapes and special amenity landscapes.

Policy P48 is a high level policy which will require the identification of outstanding natural features and landscapes in regional and district plans in order to be given effect. The RPS also requires the identification and protection of outstanding natural features and landscapes and the management of effects on them.

Some territorial authorities have identified outstanding natural features and landscapes by undertaking landscape evaluation studies such as Kāpiti Coast District Council and Masterton, Carterton and South Wairarapa district councils (in the Wairarapa Combined District Plan). When an activity is proposed to occur in the CMA or in the bed of a lake, river or wetland, they

will have to consider the effects of their activity on any outstanding natural feature or landscape that has been identified in a district plan.

Method M24 in the proposed Plan enables the WRC to work with city and district councils and the wider community to identify outstanding natural features and landscapes in the region. Other policies in the proposed Plan such as Policy 146 (reclamation) and Policy 35 (surf breaks) will also contribute to protecting outstanding natural features and landscapes in the CMA.

Retaining the status quo option of limited provisions and guidance on outstanding natural features and landscapes and not undertaking identification work would result in potentially fewer costs for the WRC. These costs would be associated with identifying outstanding natural features and landscapes and engagement with landowners and the general public. There are also benefits to resource users of the status quo approach in that additional assessments may not be necessary therefore saving costs. However the status quo approach has costs around risk to the WRC in that this approach is not reflective of national policy direction on this matter. This could result in time and process costs for the WRC and result in lengthy delays which is not efficient. A similar set of costs would also be created for resource users who would be left with much uncertainty with this approach. This option also fails to protect values appreciated by the community, and could result in a lost opportunity to identify outstanding natural features and landscapes and the loss of other values that are often linked with natural features and landscapes such as natural character and biodiversity values. The status quo approach is therefore neither effective nor efficient.

A clear framework of objectives and policies and other methods provided in the proposed Plan may have costs around future mapping work needing to be undertaken and the costs of doing a plan change. Costs may also fall on resource users who may need to undertake additional assessments of their proposals on outstanding natural features and landscapes. Some of these developments may have social benefits which could be limited if development is restricted by amending the proposed Plan as described above. However, the benefits are that the proposed Plan would be consistent with national direction provided in the NZCPS and the WRC would not be challenged that it was not giving effect to this national direction. This also provides better certainty to resource users in that the proposed Plan would be consistent with the NZCPS. Community benefits would come from the identification and protection of outstanding natural features and landscapes which would also in some instances protect other values such as natural character, biodiversity and mana whenua by proxy. This approach is therefore much more effective and efficient than status quo.

6.3 Significant geological features

Policy 13 of the NZCPS seeks the protection of natural character and includes recognition that natural character may include (b) biological, ecological, geological and geomorphological aspects. Policy 15 includes as a matter to consider (c)(i) natural science factors including geological, topographical, ecological and dynamic components when managing adverse effects on natural features and landscapes.

Table 4 below shows some of the proposed provisions that will contribute to achieving Objective O36. It should also be noted that these are not all the relevant provisions, due to the integrated nature of the proposed Plan.

Table 4: Provisions to achieve Objective O36

Objective O36 Significant geological features in the coastal marine area are protected.	
Policies	<p>Policy P50: Significant geological features</p> <p>Supporting policies</p> <p>Policy P2: Cross-boundary matters</p> <p>Policy P4: Minimising adverse effects</p> <p>Policy P9: Beneficial activities</p> <p>Policy P12: Benefits of regionally significant infrastructure and renewable energy generation facilities</p> <p>Policy P26: Natural processes</p> <p>Policy P44: Protection and restoration of sites with significant mana whenua values</p> <p>Policy P145: Reclamation, drainage and destruction</p> <p>Policy P149: Protection of the Titahi Bay fossil forest</p>
Rules	<p>Rule R162: New structures or additions or alterations to a structure inside sites of significance</p> <p>Rule R195: Disturbance or damage inside sites of significance</p> <p>Rule R199: Motor vehicles in the fossil forest at Titahi Bay</p> <p>Rule R205: Destruction, damage and disturbance inside sites of significance</p> <p>Rule R216: Destruction</p>

6.3.1 Operative provisions

The Coastal Plan includes Appendix 2 which is a list of “areas of significant conservation value”. Some of these areas have been identified as containing significant geological values e.g. Kāpiti Marine Reserve and Pauatahanui Inlet. Appendix 3 is a list of “areas with important conservation value” and identifies that areas such as Wairaka Rock and Turakirae Head also have important geological values.

Objective 4.1.6 of the Coastal Plan seeks the protection of important ecosystems and other natural and physical resources in and adjacent to the CMA from inappropriate use and development. Objective 7.1.3 also seeks that destruction, damage or disturbance to the foreshore or seabed which adversely affects the values of areas identified as “areas of significant conservation value” or “areas of important conservation value”, is avoided.

Policy 4.2.10 seeks to achieve these objectives by protecting sensitive, rare, or unusual habitats and natural and physical resources and ecosystems from the adverse effects of use and development. In the explanation to this policy, it highlights that values of the areas identified as either “areas of significant” or “important conservation value” shall be protected.

Only some activities in “areas of significant” or “important conservation value” are restricted and there are limited non-complying activities in these areas such

as reclamation, disturbance, damage and destruction (that does not meet other rules), deposition greater than 50,000m³ and other activities involving discharges to land and water (Rule 62).

The provision framework for protecting geological features in the CMA is unclear and does not provide effective guidance for both resource users and the WRC processing officers who need to assess the effects of activities on these values. This confusion can result in a great cost being the loss of values appreciated by the community which is neither effective nor efficient. This confusion can be a benefit to resource users who may not provide adequate assessment of the effects of their proposed activities on geological features.

6.3.2 The proposed Plan

The proposed Plan identifies a list of significant geological features in the CMA for the Wellington Region in Schedule J. This list is supported by Objective O36 which seeks that these geological features are protected. The policy to achieve this objective is Policy P50 which aims to protect significant geological features identified in Schedule J from significant adverse effects of use and development. For some activities, effects on significant geological features are a matter of control (Rule R151) or a matter for discretion (Rule R155). For other activities such as a new structure, it is a non-complying activity to occur in an area identified as a significant geological feature (Rule R162).

A specific geological feature that is protected in the proposed Plan and which has its own rule structure is the fossil forest at Titahi Bay. Driving motor vehicles in the area identified as containing the fossil forest is a prohibited activity (Rule R199). This is consistent with what was in the Coastal Plan.

The approach in the proposed Plan for significant geological features clearly sets out what is anticipated. Schedule J is a list of significant geological features in the CMA which provides clear guidance to resource users and the WRC processing officers on which geological features are significant and warrant protection in the proposed Plan. This provides benefits to resource users and the WRC processing officers in limiting uncertainty and providing a clear outcome in terms of this natural resource. The costs of this approach could occur in the form of concern from stakeholders/resource users who may need to undertake additional assessments to ascertain the effects of their proposal on the significant geological features. Some activities may also be non-complying in these areas resulting in extra time and processing costs for resource users. However, the benefits of providing a clear policy approach and provision framework are that the values of geological features that are appreciated by the community are protected from significant adverse effects resulting from inappropriate use and development. Significant geological features in the CMA usually also contain other values such as mana whenua values, biodiversity and natural character values, which can also be protected at the same time. This approach is therefore effective and efficient.

6.4 Significant surf breaks

While Policy 16 seeks the protection of surf breaks of national significance, the NZCPS does not specify regionally significant surf breaks. Instead, in order to preserve natural character, Policy 13 provides matters to consider when assessing natural character including (c) natural landforms such as headlands, peninsulas, cliffs, dunes, wetlands, reefs, freshwater springs and surf breaks.

The RPS does not mention significant surf breaks; instead surf breaks are addressed as part of recreational values. Objective 3 aims to protect habitats and features in the coastal environment that have significant values including recreational and landscape values from inappropriate subdivision, use and development.

Policy 35 seeks to preserve natural character in the coastal environment by (c) maintaining or enhancing amenity – such as open space and scenic values – and opportunities for recreation and the enjoyment of the coast by the public.

Table 5 below shows some of the proposed provisions that will contribute to achieving Objective O37. It should also be noted that these are not all the relevant provisions due to the integrated nature of the proposed Plan.

Table 5: Provisions to achieve Objective O37

Objective O37 Significant surf breaks are protected from inappropriate use and development.	
Policies	<p>Policy P51: Significant surf breaks</p> <p>Supporting policies</p> <p>Policy P4: Minimising adverse effects</p> <p>Policy P26: Natural processes</p> <p>Policy P132: Functional need and efficient use</p> <p>Policy P133: Recreational values</p> <p>Policy P139: Seawalls</p> <p>Policy P145: Reclamation, drainage and destruction</p>
Rules	<p>Rule R162: New structures or additions or alterations to a structure inside sites of significance</p> <p>Rule R194: Disturbance or damage</p> <p>Rule R204: Destruction, damage and disturbance outside sites of significance</p> <p>Rule R216: Destruction</p> <p>Rule R165: Additions and alterations to existing seawalls</p> <p>Rule R186: General surface water and foreshore activities</p> <p>Rule R192: Disturbance associated with beach recontouring for coastal restoration purposes</p> <p>Rule R200: Destruction, damage and disturbance associated with dredging for flood protection purposes or erosion prevention</p> <p>Rule R207: Deposition for beach renourishment</p>

6.4.1 Operative provisions

The Coastal Plan does not specifically provide for surf breaks but if necessary, the policies on recreational values would be used in assessment. Policy 4.2.20

seeks the recognition of the importance of the coastal environment to recreational activities. Policy 6.2.2 also seeks the avoidance of use or development of structures in the CMA where there will be adverse effects on recreational values.

This lack of clear guidance when dealing with surf breaks creates much uncertainty for resource users as well as the WRC processing officers who need to undertake assessments of the effects of a proposal. This can result in costs to the community being a loss of values associated with surf breaks such as recreational values and natural character. This is not effective or efficient.

6.4.2 The proposed Plan

Provisions in the proposed Plan provide a list of identified significant surf breaks in the Wellington Region (Schedule K). Objective O37 seeks to protect surf breaks from inappropriate use and development while the policy that seeks to achieve this outcome is Policy P51. This policy provides guidance on how to manage the effects of an activity on a significant surf break. A supporting policy is Policy P26 which seeks that use and development is managed to minimise effects on the integrity and functioning of natural processes. Surf breaks are often a result of geological formation and natural processes, and interference with these processes such as sediment transportation can result in adverse effects on the surf break.

Policy P4 provides guidance to Policy P26 which requires that adverse effects be minimised. That is, adverse effects are to be reduced to the smallest amount practicable and include consideration of alternative locations, timing of the activity, the use of good management practice and ensuring the scale of the activity is as small as practicable. It is intended that Policy P4 be used to guide a resource consent assessment of environmental effects for Policy P26.

This approach to identify specific significant surf breaks and include an objective and policy framework for them may result in costs for resource users in terms of additional assessments that may be necessary in order to determine their effects on significant surf breaks.

While the NZCPS does not require that significant surf breaks to be identified and protected, significant surf breaks are being identified and protected around New Zealand as they are becoming increasingly more recognised as an important natural resource for the community especially for recreation. The protection of significant surf breaks from inappropriate use and development in the Wellington Region also helps to protect other values in the coastal environment such as natural character, and goes some way to giving effect to Policy 15 of the NZCPS which is to protect natural features and landscapes which includes seascapes.

Therefore this approach has many benefits for the community, with benefits also provided for resource users with clarity provided on what surf breaks are significant and how to manage effects on them. This is both effective and efficient.

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Appendix

Assessing the appropriateness of the objectives

Table A1: Objective O36 – significant geological features

Objective O36	Significant geological features in the coastal marine area are protected.
Relevance	
Directly related to resource management issue?	Directly related to Issue 6.4 (natural character).
Will achieve one or more aspects of the purpose and principles of the RMA?	Achieves sections 6(a) and 6(b) of the RMA.
Relevant to Māori environmental issues? (sections 6(e),6(g),7(aa), 8)	Yes.
Relevant to statutory functions or to give effect to another plan or policy (i.e. NPS, RPS)?	This objective gives effect to Policies 13 and 15 of the NZCPS.
Usefulness	
Will effectively guide decision-making?	This objective sets out to protect significant geological features in the CMA that have been identified in a schedule. The objective will guide decision-making around assessing the effects of proposals on significant geological features.
Meets sound principles for writing objectives? (specific; state what is to be achieved where and when; relate to the issue; able to be assessed)	This objective states that significant geological features should be protected. There are no timeframes around this due to the nature of the subject and requirements in the RMA. Could be assessed in a monitoring strategy.
Consistent with other objectives?	Yes. Consistent with other objectives on natural character.
Achievability	
Will it be clear when the objective has been achieved in the future? Is the objective measurable and how would its achievement be measured?	This objective does not have a timeframe due to the nature of it.
Is it expected that the objective will be achieved within the life of the proposed Plan or is it an aspirational objective that will be achieved some time in the future?	This objective is aspirational that will be achieved over time.

Does the WRC have the functions, powers, and policy tools to ensure that they can be achieved? Can you describe them?	The WRC has the jurisdiction to control activities in the CMA that affect significant geological features. This can be achieved through policies and rules that will guide decision-making on activities that have the potential to have adverse effects on significant geological features in the CMA.
What other parties can the WRC realistically expect to influence to contribute to this outcome?	Territorial authorities are a key player in achieving this objective as some significant geological features in the coastal environment are located partly above MHWS (e.g. rock stacks).
What risks have been identified in respect of outcomes?	There are risks associated with identifying significant geological features in the CMA around the impacts that this might have on development and unease from stakeholders. But this risk is thought to be minimised by only identifying significant geological features in the CMA.
Reasonableness	
Does the objective seek an outcome that would have greater benefits environmentally/economically or socially compared with the costs necessary to achieve it?	This objective has greater environmental and social benefits compared to the costs necessary to achieve it.
Who is likely to be most affected by achieving the objective and what are the implications for them?	Those most likely to be affected would be those wishing to have development in the CMA where there would be an impact on significant geological features. Implications could range from further assessments necessary to determine effects on the significant geological feature.
Is the operative objective still relevant or useful?	There was no existing objective for significant geological features in the CMA.

Table A2: Objective O37 – significant surf breaks

Objective O37	Significant surf breaks are protected from inappropriate use and development
Relevance	
Directly related to resource management issue?	Directly related to Issue 6.4 (natural character).
Will achieve one or more aspects of the purpose and principles of the RMA?	Achieves section 6(a) of the RMA.
Relevant to Māori environmental issues? (sections 6(e),6(g),7(aa), 8)	Yes.
Relevant to statutory functions or to give effect to another plan or policy (i.e., NPS, RPS)?	This objective gives effect to policies 13 and 15 of the NZCPS.

Usefulness	
Will effectively guide decision-making?	This objective sets out to protect significant surf breaks in the CMA. The objective will guide decision-making around assessing the impacts of activities on the surf break.
Meets sound principles for writing objectives? (specific; state what is to be achieved where and when; relate to the issue; able to be assessed)	This objective states that significant surf breaks are protected from inappropriate use and development. There are no timeframes around this due to the nature of the subject. Could be assessed in a monitoring strategy.
Consistent with other objectives?	Yes.
Achievability	
Will it be clear when the objective has been achieved in the future? Is the objective measurable and how would its achievement be measured?	This objective does not have a timeframe due to the nature of it. Assessments could be done to determine if the significant surf breaks listed in Schedule K have been adversely affected in the region.
Is it expected that the objective will be achieved within the life of the proposed Plan or is it an aspirational objective that will be achieved some time in the future?	This objective is aspirational and is to be achieved over the life of the proposed plan.
Does the WRC have the functions, powers, and policy tools to ensure that they can be achieved? Can you describe them?	The WRC has the jurisdiction to control activities in the CMA that affect significant surf breaks. This can be achieved through policies and rules that will guide decision making on activities that have the potential to have adverse effects on surf breaks.
What other parties can the WRC realistically expect to influence to contribute to this outcome?	Territorial authorities are a key player in achieving this objective as some activities which have a potential to adversely impact on surf breaks occur about MHWS e.g. structures above MHWS on the coast.
What risks have been identified in respect of outcomes?	There are risks associated with this approach in that the list of significant surf breaks has not been tested with stakeholders or the community. But it was determined that as the surf breaks are below MHWS and not on privately owned land that this risk would be minimal.
Reasonableness	
Does the objective seek an outcome that would have greater benefits environmentally/economically or socially compared with the costs necessary to achieve it?	This objective has greater environmental and social benefits compared to the costs necessary to achieve it.
Who is likely to be most affected by achieving the objective and what are the implications for them?	Those most likely to be affected would be those wishing to have development in the CMA where there could be impacts on a surf break. This could result in further assessments necessary to identify the effects on surf breaks.
Is the operative objective still relevant or useful?	There is no specific existing objective for significant surf breaks.

Table A3: Objective O17 – natural character

Objective O17	<i>The natural character of the coastal marine area, rivers and lakes and their margins and natural wetlands is preserved and protected from inappropriate use and development.</i>
Relevance	
Directly related to resource management issue?	Directly related to Issue 6.4 (natural character).
Will achieve one or more aspects of the purpose and principles of the RMA?	Achieves section 6(a) of the RMA.
Relevant to Māori environmental issues? (sections 6(e),6(g),7(aa), 8)	Yes.
Relevant to statutory functions or to give effect to another plan or policy (i.e., NPS, RPS)?	This objective gives effect to Policies 13 and 14 of the NZCPS.
Usefulness	
Will effectively guide decision-making?	This objective sets out to protect natural character in the CMA. The objective will guide decision-making around assessing natural character and determining if an activity will protect natural character.
Meets sound principles for writing objectives? (specific; state what is to be achieved where and when; relate to the issue; able to be assessed)	This objective states that high natural character should be preserved and protected from inappropriate use and development. There are no timeframes around this due to the nature of the subject and requirements in the RMA. Could be assessed in a monitoring strategy.
Consistent with other objectives?	Yes.
Achievability	
Will it be clear when the objective has been achieved in the future? Is the objective measurable and how would its achievement be measured?	This objective does not have a timeframe due to the nature of it. Assessments could be done of natural character identification which would determine if natural character has been lost in the region.
Is it expected that the objective will be achieved within the life of the proposed Plan or is it an aspirational objective that will be achieved some time in the future?	While this objective is aspirational, it is also a requirement in the RMA.
Does the WRC have the functions, powers, and policy tools to ensure that they can be achieved? Can you describe them?	The WRC has the jurisdiction to control activities in the CMA that affect natural character. This can be achieved through policies and rules that will guide decision making on activities that have the potential to have adverse effects on natural character in the CMA.

What other parties can the WRC realistically expect to influence to contribute to this outcome?	Territorial authorities are a key player in achieving this objective as natural character is often a continuum in the coastal environment and is also found above MHWS (in terms of coastal cliffs, headlands, dunes etc.). This objective is restricted however to the natural character in the CMA.
What risks have been identified in respect of outcomes?	While the identification of high natural character is not included in the proposed Plan, this will be done on a case-by-case basis using the criteria provided in the RPS for the meantime. There are risks associated with this approach that have been considered. It was determined that due to a lack of pressure on the coastal environment in the Wellington Region, that a full identification of natural character in the CMA was not required at this time. Method M24 aims to identify natural character with territorial authorities.
Reasonableness	
Does the objective seek an outcome that would have greater benefits environmentally/economically or socially compared with the costs necessary to achieve it?	This objective has greater environmental and social benefits compared to the costs necessary to achieve it.
Who is likely to be most affected by achieving the objective and what are the implications for them?	Those most likely to be affected would be those wishing to have development in the CMA where there would be an impact on natural character. Implications could range from further assessments necessary to identify the level of natural character through to limiting development.
Is the operative objective (4.1.5) still relevant or useful?	Yes, the operative objective (4.1.5) is still relevant. The concept of natural character for the coast has been part of New Zealand policy development before the RMA. The concept of natural character is in the RMA as discussed above and national policy in the NZCPS.

Table A4: Objectives O32 and O38 – outstanding natural features and landscapes and special amenity landscapes

Objective O32	Outstanding natural features and landscapes are protected from inappropriate use and development.
Objective O38	Identified special amenity landscape values are maintained or enhanced.
Relevance	
Directly related to resource management issue?	Directly related to Issue 1.15 (outstanding landscapes) and Issue 1.16 (special amenity landscapes)

Will achieve one or more aspects of the purpose and principles of the RMA?	Achieves sections 6(b) and section 7(c) of the RMA.
Relevant to Māori environmental issues? (sections 6(e),6(g),7(aa), 8)	Yes.
Relevant to statutory functions or to give effect to another plan or policy (i.e., NPS, RPS)?	The objectives give effect to Policy 15 of the NZCPS.
Usefulness	
Will effectively guide decision-making?	The objectives set out to protect outstanding natural features and landscapes in the CMA and maintain and enhance the landscape values of special amenity landscapes. The objectives will guide decision-making around assessing natural character and special amenity landscapes and determining if an activity will protect these values.
Meets sound principles for writing objectives? (specific; state what is to be achieved where and when; relate to the issue; able to be assessed)	The first objective states that outstanding natural features and landscapes are protected from inappropriate use and development and there is no timeframe on this. Method M24 states how this is to be achieved. The second objective seeks that identified special amenity landscape values are maintained or enhanced and there is also no timeframe associated with this due to the nature of the subject and requirements in the RMA. Could be assessed in a monitoring strategy.
Consistent with other objectives?	Yes.
Achievability	
Will it be clear when the objective has been achieved in the future? Is the objective measureable and how would its achievement be measured?	These objectives do not have a timeframe due to the nature of them. Assessments could be done of outstanding natural features and landscapes and special amenity landscapes to determine if these values have been degraded in the region.
Is it expected that the objective will be achieved within the life of the proposed Plan or is it an aspirational objective that will be achieved some time in the future?	While these objectives are aspirational, the objective on outstanding natural features and landscapes is also a requirement in the RMA.
Does the WRC have the functions, powers, and policy tools to ensure that they can be achieved? Can you describe them?	The WRC has the jurisdiction to control activities in the CMA that affect outstanding natural features and landscapes and special amenity landscapes This can be achieved through policies and rules that will guide decision making on activities that have the potential to have adverse effects on these values.

What other parties can the WRC realistically expect to influence to contribute to this outcome?	Territorial authorities are a key player in achieving these objectives as outstanding natural features and landscapes and special amenity landscapes are a continuum in the coastal environment and also found above MHWS (in terms of coastal cliffs, headlands, dunes etc.). This objective is restricted however to these values in the CMA.
What risks have been identified in respect of outcomes?	While the identification of outstanding natural features and landscapes is not included in the proposed Plan, this will be done on a case-by-case basis using the criteria provided in the RPS for the meantime. There are risks associated with this approach that have been considered. It was determined that due to a lack of pressure on the coastal environment in the Wellington Region, that a full identification of these values in the CMA was not required at this time. Method M24 aims to identify outstanding natural features and landscapes with territorial authorities.
Reasonableness	
Does the objective seek an outcome that would have greater benefits environmentally/economically or socially compared with the costs necessary to achieve it?	These objectives have greater environmental and social benefits compared to the costs necessary to achieve it.
Who is likely to be most affected by achieving the objective and what are the implications for them?	Those most likely to be affected would be those wishing to have development in the CMA where there would be an impact on outstanding natural features and landscapes or special amenity landscapes. Implications could range from further assessments necessary to identify the extent of outstanding natural features and landscapes through to restricting development.
Is the operative objective still relevant or useful?	There were no specific operative objectives on these matters.

Identifying alternative policies, rules and other methods

Table A5: Provisions for significant geological features

		Option 1 – Status quo	Option 2 – New provisions
Costs (of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the provisions)	The WRC	Lack of clear guidance with the status quo options leads to uncertainty of using provisions for assessment of effects of proposals on geological features.	Potential concern from stakeholders
	Resource user (consent applicant or permitted use)	Limited guidance afforded by the status quo option which can create uncertainty.	A list of areas with significant geological value could mean that more activities may be non-complying which can create additional costs for resource users.
	Community costs (environmental, social, economic, cultural)	Poor guidance on dealing with geological features means that there is a potential that these values can be lost.	Potential costs for the community in terms of limitations on development.
Benefits (of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the provisions)	The WRC	Less concern from stakeholders	Better guidance provided in the proposed Plan for the WRC officers assessing applications and their effects on geological features.
	Resource user (consent applicant/licensed operator or permitted use)	Less risk to new development	Consistency with direction provided in the NZCPS and RPS. Certainty provided for resource users.
	Community benefits (environmental, social, economic, cultural)	Less risk to development that could have potential benefits for the community.	<p><u>Social benefits</u> Protection of significant geological features that provide value to the community.</p> <p><u>Environmental benefits</u> The protection of geological features can also protect other values of the CMA such as natural character and biodiversity values.</p> <p><u>Cultural benefits</u> Areas identified as having significant geological features also sometimes have value to mana whenua which can also be protected.</p>

		Option 1 – Status quo	Option 2 – New provisions
Efficiency (costs vs benefits) and effectiveness (will the provisions achieve the objective)		The Coastal Plan provides only limited guidance when assessing effects of proposals on geological features. These have not been specifically identified in the Coastal Plan, instead are one value identified for areas for significant conservation value and important conservation value. This is not effective or efficient.	The proposed Plan provisions for geological features provide certainty for both the WRC and resource users and gives effect to national policy and the RPS as this is efficient and effective.
Risks (of acting or not acting) (If there is uncertain or insufficient information)		Not providing clear guidance or identification of geological features can result in conflicts and uncertainty for the WRC, resource users and the general public.	There are risks around defending this approach.
Appropriateness (If it is efficient and effective then it must be appropriate)		A lack of clear guidance, resulting in uncertainty is neither effective nor efficient, which is inappropriate.	This option is appropriate as it implements national policy and the RPS.
Conclusions		Option 1 is not considered to be the most effective or efficient way to achieve the objective or the purpose of the RMA.	Option 2 is considered to be the most effective and efficient means of achieving the proposed objectives and meeting the purpose of the RMA.

Table A6: Provisions for significant surf breaks

		Option 1 – Status quo	Option 2 – New provisions
Costs (of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the provisions)	The WRC	Lack of clear guidance with the status quo options leads to uncertainty of using provisions for assessment of effects of proposals on significant surf breaks.	Potential concern from stakeholders
	Resource user (consent applicant or permitted use)	Limited guidance afforded by the status quo option which can create uncertainty.	A list of significant surf breaks included in the proposed Plan could create additional costs associated with assessments as part of development proposals.
	Community costs (environmental, social, economic, cultural)	Poor guidance on dealing with surf breaks means that there is a potential that these values can be lost.	Potential costs for the community in terms of limitations on development.

		Option 1 – Status quo	Option 2 – New provisions
Benefits (of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the provisions)	The WRC	Less concern from stakeholders	Better guidance provided in the proposed Plan for the WRC officers assessing applications and their effects on surf breaks
	Resource user (consent applicant/licensed operator or permitted use)	Less risk to new development	Consistency with direction provided in the NZCPS. Certainty provided for resource users.
	Community benefits (environmental, social, economic, cultural)	Less risk to development that could have potential benefits for the community.	<u>Social benefits</u> Protection of significant surf breaks that provide value to the community. <u>Environmental benefits</u> The protection of surf breaks can also protect other values of the CMA such as natural character. <u>Cultural benefits</u> Areas identified as significant surf breaks also sometimes have value to mana whenua which can also be protected.
Efficiency (costs vs benefits) and effectiveness (will the provisions achieve the objective)		The Coastal Plan provides only limited guidance when assessing effects of proposals on surf breaks. These have not been specifically identified in the Coastal Plan.	The proposed Plan provisions for significant surf breaks provide certainty for both the WRC and resource users and gives effect to national policy and this is efficient and effective.
Risks (of acting or not acting) (If there is uncertain or insufficient information)		Not providing clear guidance on the management of significant surf breaks can result in conflicts and uncertainty for the WRC, resource users and the general public.	There are risks around defending this approach.
Appropriateness [If it is efficient and effective then it must be appropriate]		A lack of clear guidance, resulting in uncertainty is neither effective nor efficient, which is inappropriate.	This option is appropriate as it implements national policy and the RPS.
Conclusions		Option 1 is not considered to be the most effective or efficient way to achieve the objective or the purpose of the RMA.	Option 2 is considered to be the most effective and efficient means of achieving the proposed objectives and meeting the purpose of the RMA.

Table A7: Provisions for natural character

		Option 1 – Status quo	Option 2 – New provisions
Costs (of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the provisions)	The WRC	The Coastal Plan includes an objective and policies on the protection of natural character consistent with direction in the RMA but does not cover identifying high natural character or have any related provisions as required in the NZCPS. Costs could include challenge from stakeholders and statutory bodies around not implementing the NZCPS.	Costs around future mapping of natural character in the CMA. Costs associated with changing the proposed Plan to insert the mapping work and any new related provisions. Costs associated with engagement of affected stakeholders and members of the wider community.
	Resource user (consent applicant or permitted use)	Costs associated with uncertainty to a resource user if the existing provisions do not give effect to the NZCPS.	Costs to resource users as a result of amendments to proposed plan provisions on protecting natural character such as additional assessments required to identify the “level” of natural character (e.g. outstanding, high, other) and determine adverse effects on it from proposals.
	Community costs (Environmental, social, economic, cultural)	Decisions made that would not reflect national policy direction and therefore could lead to poor environmental, social, economic and cultural outcomes such as adverse effects on high natural character in the CMA.	<u>Social costs</u> Costs around potential limit to development that might have social benefits e.g. wind farms. <u>Economic costs</u> Costs around potential restrictions on development.
Benefits (of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the provisions)	The WRC	No additional costs to the WRC such as those associated with mapping, policy and other method development and engagement processes.	The WRC is including provisions in its proposed Plan that are consistent with the NZCPS and the RPS.
	Resource user (consent applicant/licensed operator or permitted use)	No extra requirements for development proposals to identify the “level” of natural character in assessments and their effects on it.	Better consistency with national guidance in the NZCPS and therefore more certainty about the provisions.

		Option 1 – Status quo	Option 2 – New provisions
	Community benefits (environmental, social, economic, cultural)	Potentially less restrictions on development that has community benefits and less costs.	<p><u>Social benefits</u> Protection of natural character which contributes to social well-being for future generations.</p> <p><u>Environmental benefits</u> The protection of natural character can also have additional positive effects such as the protection of biodiversity often a contributor to natural character.</p> <p><u>Cultural benefits</u> The protection of natural character can also by default protect areas of cultural significance.</p>
Efficiency (costs vs benefits) and Effectiveness (will the provisions achieve the objective)		This option has costs around not implementing the NZCPS which could lead to challenge from stakeholders including other statutory bodies who will expect the WRC to implement the NZCPS as the time of the plan review. The operative provisions therefore will not provide the level of protection expected in the NZCPS and no real perceived benefits to the WRC or community but only to resource users who will not be expected to undertake any additional assessments.	<p>While there may be some costs associated with the identification and protection of natural character in the CMA for the mapping work and potential implications for development in terms of restrictions, protection of natural character is not only a requirement in the NZCPS and RPS, but is also part of meeting the section 6 requirements in the RMA.</p> <p>New provisions may eventuate in the proposed plan as a result of the mapping work and associated provisions attached to it. Rules to protect natural character will provide an even stronger plan framework.</p>
Risks (of acting or not acting) (If there is uncertain or insufficient information)		No risks identified.	There are risks around not acting on the information in the NZCPS namely a challenge from stakeholders including statutory bodies with functions.
Appropriateness (If it is efficient and effective then it must be appropriate)		This option is not appropriate as it fails to acknowledge the NZCPS policy direction considered appropriate to meet the purpose of the RMA.	This option is appropriate as it implements national policy direction around protecting natural character and managing adverse effects. While there will be costs around engagement with the community and technical work around identification and mapping, this is important work that is needed to fulfil the requirements of the RMA.

		Option 1 – Status quo	Option 2 – New provisions
Conclusions		Option 1 is not considered to be the most effective or efficient way to achieve the objective or the purpose of the RMA.	Option 2 is considered to be the most effective and efficient means of achieving the proposed objectives and meeting the purpose of the RMA.

Table A8: Provisions for outstanding natural features and special amenity landscapes

		Option 1 – Status quo	Option 2 – New provisions
Costs (of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the provisions)	The WRC	There will be costs around the fact that the existing provisions do not address natural features and landscapes therefore the status quo option is not giving effect to the RPS or NZCPS largely coming from stakeholders and statutory bodies who may challenge this approach. Opposing submissions on proposed provisions and associated costs of defence/court costs	Costs around future mapping of natural features and landscapes in the CMA. Costs associated with changing the proposed Plan to insert the mapping work and any new related provisions. Costs associated with engagement of affected stakeholders and members of the community.
	Resource user (consent applicant or permitted use)	Costs associated with provisions being inconsistent with national level direction. Uncertainty for resource users.	Costs to resource users of additional assessments on the impacts of proposals on natural features and landscapes that may limit development.

		Option 1 – Status quo	Option 2 – New provisions
	Community costs (environmental, social, economic, cultural)	<p><u>Social costs</u> Status quo option fails to protect values associated with natural features and landscapes that the community appreciates.</p> <p><u>Economic costs</u> Potential loss of opportunity by identifying and protecting natural features and landscapes.</p> <p><u>Environmental costs</u> Status quo option creates potential for significant impacts on natural features and landscapes and other associated values e.g. biodiversity.</p>	<p><u>Social costs</u> Costs around potential limit to development that could enhance social well-being.</p> <p><u>Economic costs</u> Costs around restrictions to development and additional assessments required to assess the impact of development on natural features and landscapes.</p>
Benefits (of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the provisions)	The WRC	<p>Fewer costs for identification work such as mapping or doing a variation or plan change.</p> <p>Less costs associated with engagement with stakeholders/landowners.</p> <p>Faster process</p>	The WRC is including new objectives and policies to protect natural features and landscapes. This approach is consistent with the NZCPS and is currently a gap in the Coastal Plan.
	Resource user (consent applicant/licensed operator or permitted use)	No extra assessments (less additional costs) required to determine adverse effects on outstanding natural features or landscapes.	Certainty for resource users from consistency of provisions with national direction.

		Option 1 – Status quo	Option 2 – New provisions
	Community benefits (environmental, social, economic, cultural)	<p>Potential lower cost for development that may have a social, economic or cultural benefit for the community.</p> <p>Lower costs on future development regarding additional assessments required.</p>	<p><u>Social benefits</u> Benefits from identification and protection of natural features and landscapes that will be valued by the community.</p> <p><u>Environmental benefits</u> A positive consequence is the protection of biodiversity often associated with the identification of outstanding natural features and landscapes.</p> <p><u>Cultural benefits</u> The protection of outstanding natural features and landscapes can also result in the protection of areas of cultural significance (which can sometimes be the same thing).</p>
Efficiency (costs vs benefits) and effectiveness (will the provisions achieve the objective)		<p>While there are benefits of this approach such as there being lower costs for resource users and potentially the community around not having to identify or protect natural features and landscapes, this approach is not giving effect to higher level direction in the RMA and NZCPS. The cost of the status quo approach is potential of significant adverse effects on outstanding natural features and landscapes and other associated values which the community appreciates and concern from stakeholders that the provisions are not giving effect to the NZCPS.</p>	<p>There may be some costs associated with the identification and protection of outstanding natural features and landscapes in the CMA such as additional costs related to mapping and stakeholder engagement.</p> <p>There are also potential implications for development in terms of restrictions in order to protect these values. However amending the provisions will give effect to both the NZCPS and RPS and will also meet section 6 requirements of the RMA. Protecting these values also protects other associated values appreciated by the community.</p> <p>New provisions will eventuate in the proposed Plan as a result of the mapping work and associated provisions attached to it. This will result in new maps and schedules. There will also be rules that link to these new schedules which will further protect outstanding natural features and landscapes from inappropriate use and development.</p>

		Option 1 – Status quo	Option 2 – New provisions
Risks (of acting or not acting) (If there is uncertain or insufficient information)		There are risks of using the status quo option of not implementing the NZCPS or RPS specifically challenge from stakeholders and statutory bodies.	The identification and mapping work will involve engagement with stakeholders who may challenge the methodology of the work and the inclusion of some areas.
Appropriateness (If it is efficient and effective then it must be appropriate)		This option is not appropriate as it fails to acknowledge and give effect to national policy direction and direction in the RPS considered to be appropriate to meeting the purpose of the RMA.	Option 2 is appropriate given the effectiveness and efficiency towards achieving the proposed Plan's objectives and meeting the purpose of the RMA.
Conclusions		Option 1 is not considered to be the most effective or efficient means of achieving the proposed objectives or meeting the purpose of the RMA.	The proposed new provisions for the management of the region's outstanding natural features and landscapes and special amenity landscapes are considered the most efficient and effective for meeting the purpose of the RMA by managing the resource sustainably and in a manner that provides for the community's economic, social and cultural well-being.

The Greater Wellington Regional Council's purpose is to enrich life in the Wellington Region by building resilient, connected and prosperous communities, protecting and enhancing our natural assets, and inspiring pride in what makes us unique

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