

SmartGrowth Strategy 2023–2073

ISSUES AND OPTIONS PAPER

Te Taiao –Environment

Author: Barbara–Ann Overwater

Topic	Te Taiao Environment– (Part 3, The Spatial Plan, Chapter 04)
Issues	<ol style="list-style-type: none"> 1. Poor air quality 2. Impact of growth on the environment 3. Manage and protect freshwater resources

Staff Narrative

Overview of feedback received

A total of 19 submission points were coded to Te Taiao – Our Environment arising from 15 submitters:

Ranjard, Louis – submitter 1

Low, Jason –submitter 35

Sustainable Bop Trust – submitter 91

Smith-Kerr, Stephanie Heather – submitter 2

Pirere, Tania – submitter 17

Mcleod, Whitiara – submitter 32

Ministry Of Education – submitter 59

Chalmers, Nick – submitter 20

Fitter, Julian Richmond – submitter 47

Bowden, Beth Willard – submitter 53

Robson, John – submitter 54

Envirohub – submitter 62

Pirirakau Tribal Authority – Incorporated – submitter 69

Tangata Whenua Collective submission – submitter 60

Ngai Tukairangi Trust – submitter 87

Two submitters (Sub I.D #32, # 59) generally expressed support for the approach outlined in the chapter. Submitter I.D #54 generally opposes the chapter.

Submitter I.D #17 did not provide specific feedback on the chapter however highlighted the work of D.O.C in looking after our tupuna and making sure our whenua and Moana are protected.

Issue 1: Poor air quality

Three submitters (Sub I.D #1, #35, #91) expressed concern about air quality in the area, with two of these submitters (Sub I.D #35, #91) requesting to move the polluting industry away from the Mount industrial zone. Sub I.D #1 considers air quality a top priority for the development of the region however sees only limited mention of it in the strategy. This submitter suggests imposing standards for the industry and to limit the traffic in the area until air pollution returns to safe levels. Sub I.D #91 questioned why

the polluted air shed at the Mount is not addressed in the strategy, with its supplementary submission letter noting that it is a major concern for that community, including local hapu and iwi. This submitter questions whether the strategy can address this matter through providing a sub-region wide overview of the most suitable location/s for polluting activities over a 30–50-year timeframe.

Issue 2: Impact of growth on the environment

Several submitters (Sub I.D #2, #20, #47) questioned how the impact of growth on the environment will be addressed, with specific points on:

- the effect of growth on resources, particularly kaimoana and how will environmental impacts of growth be negated
- priority given to the environment and enhancing native biodiversity
- impact of the Te Tumu development on the most significant river in the region and adjacent wetland
- industrial environment protection in relation to building houses and the associated waste.

Submitter I.D #69 have noted that the Taiao implications against the SmartGrowth Strategy are hugely significant, and the strategy enables and influences this direction. This submitter notes the waterways are now largely modified and controlled for flooding management and states this is not the Taiao that is promised against historic confiscation and the impacts on our natural environment. This submitter requests greater recognition and actions provided for by the NPSFM and NPSIB.

Submitter I.D #53 states that the proposed growth directives are “highly qualified” and “privileging of human settlement ambitions” and questions the meaning of the proposed directive “growth of the western Bay of Plenty is within environmental limits”.

Submitter I.D #62 has submitted that councils have opportunities to remedy environmental degradation but it needs to be a primary focus not just an afterthought. The transformational shift in thinking and action must place green infrastructure in the same scoping space as built infrastructure, noting that ecosystems are not an add-on, but are fundamental. Sub I.D #62 requests the inclusion of the Climate Resilience Chapter 03 principle ‘*Integrate and enhance local ecosystems and biodiversity*’ into each of the grey integration boxes within each chapter and requests an appropriate environmental growth directive is added to each chapter.

Issue 3: Manage and protect freshwater resources

Submitter I.D #32 noted that data is needed that will indicate whether Te Taiao can accommodate the current municipal water take and future municipal take.

Two submitters (Sub I.D #60, #87) have identical submission points which question whether there is sufficient capacity within the natural environment to handle more people, and if there is sufficient water supply for a growing population. These two submitters highlighted the need to ensure waterways and aquifers are kept healthy and not stressed by over abstraction and the need to ensure a whole systems approach, from maunga ki te moana.

Submitter I.D #87 questioned whether the strategy considers how the implementation of Te Mana o te Wai and the National Policy Statement for Freshwater Management (NPSFM) may be constrained with the predicted urban growth. This submitter notes that water is fundamental to its orchard operations and without adequate access its business is not viable. The submitter also noted that there are other considerations that must be incorporated into urban planning processes to help cities effectively manage and protect freshwater resources such as drinking water supply, wastewater and stormwater management, sustainable water use (water conservation, efficient irrigation, reclaimed water for non-potable purposes), ecosystem conservation, integrated land-use planning, climate change resilience, public education, and emergency preparedness.

Submitter I.D #87 also expressed interest in a collaborative approach to understanding how the sub-regions Māori land trusts with horticultural/agricultural/energy interests (dependent on freshwater) could be impacted by restricted access because of urban growth.

Key considerations

- The extent to which the strategy has addressed air quality concerns, particularly around the Mount Industrial Zone.
- The extent to which the strategy has given priority to protecting and enhancing Te Taiao our environment.
- The extent to which the strategy focuses on the protection of the health and well-being of freshwater resources and the need to ensure a whole systems integrated approach.

The SmartGrowth background papers should also be referred to:

- SmartGrowth Strategy Te Taiao – Our Environment background paper (September 2023)
- SmartGrowth Strategy Infrastructure background paper (August 2023)
- Tauranga City Council

There are three key issues set out for the Panel's consideration. The practicable options in relation to these issues are set out below.

Options overview

Issue 1: Poor air quality

How the draft SmartGrowth Strategy currently addresses the issue of poor air quality, directly or indirectly:

- Part 1: Transformation Shift 05 – Restore and enhance eco-systems for future generations – *Ensuring what's special about the western Bay of Plenty environment is restored and enhanced – the beaches, harbour, open spaces, native bush, wetlands and air* (page 20). The transformational shifts will guide the priorities for the Strategy's Implementation and Funding Plan.
- Part 3: Chapter 06– Urban Form and Centres (page 106): Includes reference to the SmartGrowth partners collaboratively working on several projects that relate to industrial land, particularly work relating to the Mount Maunganui/Port

	<p>industrial area. This chapter notes that these projects collectively respond to a range of significant issues, of which air quality and health concerns are noted.</p> <ul style="list-style-type: none"> Part 3: Chapter 11 – Economic Well-being (page 136): Includes projected employment numbers for Mount Maunganui alongside recognising the ‘Airshed and environmental considerations.
<p>Option 1A (recommended)</p>	<ul style="list-style-type: none"> Amend Figure 2 <i>Chapter 04 – Te Taiao Our Environment</i> to recognise environmental management plans, strategies and programmes which include reference to air quality Insert additional text in <i>Chapter 04 – Te Taiao Our Environment –Key Challenges</i> that recognises the effects of existing activities and intensification on our environment, including reference to air quality, Reference in the Implementation and Funding Plan to the continued collaboration of SmartGrowth partners, government entities, iwi and other stakeholders in the delivery of environmental management plans, strategies and programmes and identify any future aspirations around addressing the effects of polluting activities
<p>Issue 2: Impact of growth on the environment</p> <p>How the draft SmartGrowth Strategy currently addresses the issue of impact of growth on the environment, directly or indirectly:</p> <ul style="list-style-type: none"> Part 1: Transformational Shifts (page 18): Inclusion of an overarching fundamental principle ‘Ngā Wai ki Mauao me Maketū’ which underpins the six transformational shifts for change (pages 18-21). The principle embodies a commitment to environmental sustainability to ensure that population growth and social and economic development can be accommodated within natural resource ‘limits’. It recognises: <ul style="list-style-type: none"> -The importance of the waters (coastal and freshwater bodies) that flow to Mauao and Maketu and the significance of these two places to tāngata whenua -The linkages between the maunga (mountains), ngāhere (forests), awa (waterways), repo (wetlands), tāhuna (estuaries) and moana (harbours and ocean). -The protection and enhancement of the interconnected nature of these elements through an integrated catchment management approach, using nature-based solutions and enhancing biodiversity, while improving climate resilience. Part 1: Transformational Shifts: Footnote 6 (page 18) explains that the natural resource ‘limits’ are set by National Policy Statements and Environmental Standards and by the Natural and Built Environment Act (NBA) and the National Planning Framework. Part 1: Transformation Shift 05 – Restore and enhance eco-systems for future generations – <i>Ensuring what’s special about the western Bay of Plenty environment is restored and enhanced – the beaches, harbour, open spaces, native bush, wetlands, and air</i> (page 20) 	

- Part 3: Chapter 04 – Te Taiao (page 80): Setting out the values associated with our environment and including reference to the fundamental principle that growth accommodation must be within the limits set through ‘Ngā Wai ki Mauao me Maketū’.
- Part 3: Chapter 04 – Te Taiao: Figure 1 (page 81) Identifying the scope of Te Taiao to show the domains of Moana, Awa and Whenua and interconnectedness with indigenous biodiversity. This helps understand Te Taiao, show the interconnections, and identify environmental challenges later in the chapter.
- Part 3: Chapter 04- Te Taiao Figure 2 (page 82)– *Te Taiao – our environment connections to existing work programmes*. The figure represents the collective response to the many challenges faced, to ensure what’s special about the western Bay of Plenty environment is protected, enhanced, and restored. The current or on-going work is a mix of local or site-specific projects (e.g., community care group projects, species, and habitat restoration projects), spatial plans for areas, and reserve management planning, city and district-wide policies and plans, catchment-based programmes, and programmes to implement national policy direction (including the National Policy Statement on Freshwater Management and National Policy Statement on Indigenous Biodiversity).
- Part 3: Chapter 04 -Te Taiao: Key challenges (page 83): These include (amongst others) reference to Natural Resource Limits and pressure on the environmental resources; and the challenge of implementing NPSIB and NPSFM which will require integrated work streams with several stakeholders.
- Part 3: Chapter 02 Tangata Whenua: Key challenges (page 62)- #4 Cumulative and potentially irreparable impact of uncontrolled urban development on the natural environment.
- Growth directives:
 - Development avoids areas with important environmental, cultural and heritage values, or that are at risk from coastal erosion (including inner harbour erosion) (page 51)
 - Take a precautionary approach to development in areas identified as ‘go carefully’.
 - Nature-based solutions and water sensitive urban design are priorities and used in urban areas (page 77)
 - Coastal, terrestrial and freshwater ecosystems are enhanced to improve carbon storage and resilience to climate change (page 77)
 - An interconnected network of open spaces, reserves and ecological corridors is developed (page 85).
 - A full range of ecosystems in the western Bay of Plenty are maintained or restored to a healthy functioning state (page 85)
 - Growth of the western Bay of Plenty is within environmental limits (page 85)
 - Secure and protect long-term water availability for all our communities within environmental limits set in accordance with Te Mana o te Wai (page 125)
- Part 3: Chapter 04 – Te Taiao: Integration with the Well-beings, Objectives and Climate Resilience Principles (grey box page 85).

<ul style="list-style-type: none"> Part 3: Chapter 04 – Te Taiao: Maps 6 Biodiversity; Map 7 Open Space and Access; Map 8 Protecting and Enhancing Key Areas; Map 9 Marine Natural and Cultural Areas provide a spatial representation of Te Taiao Case Studies – Pages 86,96, 98 Part 3: Chapter 05 –Rural: Introduction – identifies the rural area containing most of the sub-region’s remaining indigenous flora and fauna, highlighting the need for protection and enhancement (page 92) 	
<p>Option 2A (recommended)</p>	<ul style="list-style-type: none"> Insert additional text in <i>Chapter 04 – Te Taiao Our Environment</i> to include: <ul style="list-style-type: none"> amended ‘key challenge’ to include reference to growth needing to be cognisant of the impact on natural resources, be cleaner and more resilient, while accounting for natural hazards and the role of environmental management and nature resources in minimising risks. additional ‘key challenges’ to address preserving the values of the coastal marine area, and the loss and degradation of indigenous biodiversity Definition of Environmental Limits included in the appendix. Insert the Climate Resilience principle ‘<i>Integrate and enhance local ecosystems and biodiversity</i>’ into the grey integration box within chapters 5–8 and 10,11 of <i>Part 3 The Spatial Plan</i>.
<p>Option 2B</p>	<p>Option 2A and include:</p> <ul style="list-style-type: none"> additional appropriate environmental growth directives in other chapters in the strategy.
<p>Issue 3: Manage and protect freshwater resources</p> <p>How the draft strategy currently addresses the issue of managing and protecting freshwater resources, directly or indirectly:</p> <ul style="list-style-type: none"> Part 2: The Growth Challenge – Challenges and Opportunities (page 38) Challenge 6 - <i>Managing pressure from development on the natural environment, including from more intensive horticultural and agricultural uses.</i> Part 3: Chapter 01- Areas to be protected and developed carefully: Background section – environmental areas and landscapes (page 49). Part 3: Chapter 01 – Areas to be protected and developed carefully: Key Challenge #1 Pressures on the natural and cultural environment (page 50). Part 3: Chapter 04 – Te Taiao: Identifying existing projects, implementation plans, programmes and action plans contributing to Te Taiao (Figure 2, page 82) which includes NPS-FM work programme, Catchment strategies, programmes and projects, Three Waters Infrastructure Strategies, Co-governance River documents. Part 3: Chapter 02- Tangata Whenua: Key Challenges #4 – Cumulative and potentially irreparable impact of uncontrolled urban development on the natural environment (page 62). 	

- Part 3: Chapter 02 – Tangata whenua perspectives on growth management diagram (page 59): Economic (inequities – including access to water), Environmental – Low impact design/water sensitive urban design.
- Part 3: Climate Resilience: Figure 12 Climate Resilient Development Principles – Integrating and enhancing local ecosystems and biodiversity.
- Part 3: Chapter 04 – Te Taiao -Introduction: values associated with our environment include waterways and water quality (page 80).
- Part 3: Chapter 04- Te Taiao: Figure 2: Includes catchment strategies, programmes and projects alongside NPS Freshwater Programme (page 82).
- Part 3: Chapter 04 – Te Taiao: Key challenges:
 - Natural resource limits (page 83)
 - Achieving clear integration of Ngā Wai ki Mauao me Maketu with other key topics, utilising methods such as Water Sensitive Urban Design, Low Impact Design and integrated catchment planning to promote clean and sustainable water outcomes and achieve national policy direction (page 83).
 - Achieving Ngā Wai ki Mauao me Maketū (page 84)
 - Implementation of the NPSFM and noting it will require integrated work streams with several stakeholders (page 84).
- Part 3: Chapter 04: Te Taiao – Map 6: Biodiversity; Map 8 Protecting and enhancing key areas.
- Part 3: Chapter 09: Three Waters and Other Infrastructure: Three waters key challenges (pages 123-124), challenge 1, 4 and 7.
- Growth directives:
 - Development avoids areas with important environment, cultural and heritage values, or that are at risk from coastal erosion (including inner harbour erosion) (page 51)
 - Take a precautionary approach to development in areas identified as 'go carefully' (page 51)
 - Nature based solutions and water sensitive urban design are prioritised and used in urban areas (page 77)
 - Coastal, terrestrial, and freshwater ecosystems are enhanced to improve carbon storage and resilience to climate change (page 77)
 - An interconnected network of open spaces, reserves and ecological corridors is developed (page 85).
 - A full range of ecosystems in the western Bay of Plenty are maintained or restored to a healthy functioning state (page 85)
 - Growth of the western Bay of Plenty is within environmental limits (page 85)
 - Planning of land use and infrastructure (including three waters, transport, and community facilities) is fully integrated to:
 - Be resilient to climate change and natural hazards.
 - Achieve holistic sub-regional approach.
 - Give effect of Te Mana o te Wai.
 - Be in partnership with tāngata whenua and our communities.
 - Meet environmental and cultural standards.
 - Achieve cost-effective development.
 - Secure and protect long-term water availability for all our communities within environmental limits set in accordance with Te Mana o te Wai (page 125)

	<ul style="list-style-type: none"> - Wastewater and water supply networks and treatment plants are managed across the sub-region to achieve efficient and effective investment to service planned urban growth (page 125) - Stormwater is managed to: use nature-based and water sensitive urban design and integrate with a water cycle approach (page 125) - Part 4: FDS: Development Infrastructure (page 150)
<p>Option 3A (recommended)</p>	<ul style="list-style-type: none"> • Insert additional text in <i>Chapter 04 – Te Taiao Our Environment</i> to include: <ul style="list-style-type: none"> - Description of catchment management/enhancement and freshwater resources in the introduction. - Amendments to key challenges to highlight land use planning is critical in managing various land uses in a catchment, and reference to Te Mana o te Wai.
<p>Option 3B</p>	<p>As Option 3A and include:</p> <ul style="list-style-type: none"> • an additional growth directive for healthy waterbodies

Issue 1: Air Quality

Option 1A: Recommended

- Provide additional text that recognises the issue of poor air quality amongst other environmental management issues as follows:
 - i. Amend and insert additional wording in *Part 3: The Spatial Plan – Chapter 04 Te Taiao – Our Environment Figure 2* as follows:
 - Insert a new circle titled “Environmental management” with the following associated bullet points in a text box:
 - Mount Maunganui airshed management plan
 - BOPRC monitoring programmes
 - Local Spatial Plan actions
 - Travel Demand management/behavioural change programmes
 - Iwi and hapū management plans
 - Regional Policy Statement
 - Regional Plans
 - ii. Insert additional wording in the *Part 3: The Spatial Plan- Chapter 04 Te Taiao – Our Environment, Key Challenges* to include a new challenge as follows: *‘Effect of existing activities and intensification on our environment’*: Our environment is polluted when substances or kinds of energy (noise, light, heat) enter it and cause harm. Although some pollutants occur naturally, in urban areas pollution comes mostly from human activities (such as industry, agriculture, urban development and transport) and can accumulate to harmful levels in air, land, freshwater, and marine environments. Pollutants can move in the air, in water, and through soil, often over large distances and long periods of time. Pinpointing the cause of pollution can be difficult. Some pollution comes from one place (e.g. emissions from a factory) while other pollution has many sources (e.g. vehicle emissions or agriculture practices). Pollution has a major effect on our environment, harming our ecosystems and our relationship with nature, and posing risks to human health. We need to manage the impact of pollution on people’s health and the environment, and improve environmental, cultural and social well-being outcomes.
 - iii. Ensure the Implementation and Funding Plan recognises the SmartGrowth partnership, Ministry for the Environment and Health NZ Te Whatu Ora continues to work alongside mana whenua, iwi, businesses, other stakeholders and community groups to enhance the effectiveness of environmental management plans, strategies and programmes and identify future aspirations around addressing the effects of polluting activities.

Advantages

- Would address submitters concern regarding the need for more recognition of the issue of poor air quality.

Disadvantages

- Does not directly respond to some of the submission points received in relation to moving polluting industrial activities away from the Mount Maunganui Industrial area. This issue has been raised as part of the Mount to Arataki

<ul style="list-style-type: none"> • Would recognise the variety of work programmes, plans and policy measures related to environmental management processes, including air quality. • Would enable the issue of poor air quality to be recognised amongst other environmental challenges. • Would highlight emitting activities are having adverse effects on people, communities, and the environment. • Includes recognition of continued collaborative working amongst all partners, government entities, iwi and other stakeholders to address polluting activities. 	<p>Spatial Plan consultation. The Strategy is not the place to be addressing specific and detailed planning issues other than to provide a framework for aligning such matters with the Strategy direction.</p>
<p>Financial implications</p>	
<p>None. No changes are required under this option.</p>	
<p>Other considerations</p>	
<p>Financial implications</p>	
<p></p>	
<p>Issue 2: Impact of growth on the environment</p>	
<p>Option 2A: Recommended</p> <ul style="list-style-type: none"> • Provide additional text as follows: <ul style="list-style-type: none"> ī. Insert additional text in <i>Part 3: The Spatial Plan- Chapter 04 -Te Taiao Our Environment - Introduction (paragraph 3)</i> as follows: <ul style="list-style-type: none"> – Underpinning these values is the fundamental principle that growth accommodation must be within the <u>environmental</u> limits set through Ngā Wai ki Mauao me Maketu, which recognises: – Amend footnote #1 (bottom of page 80) as follows: The limits referred to in this context are informed by National Policy Statements and Environmental Standards. See the definition of environmental limits in the appendix 	

- ii. Include a definition of Environmental Limits in the Appendix as follows: Environmental Limit: The level of some environmental pressure, indicator of environmental state or benefit derived from the natural resource system, beyond which conditions are deemed to be unacceptable in some way
- iii. Insert additional text in *Part 3: The Spatial Plan- Chapter 04 Te Taiao Our Environment -Key Challenges* as follows:
 - Amend the environmental challenge #1 *Natural Resource Limits*, as follows: As our sub-region grows, the pressure on the environmental resources increases. In particular, managing natural hazards, protecting highly productive land and managing water. Many of the sub-region's resources are facing growing pressures. Successive reports show that pressure on our climate, waterways, marine environment and land is mounting. As a sub-region, we need to invest back into the environment more than what we take out. This is an on-going challenge when the sub-region has high growth rates. We need to ensure that growth is cognisant of the impacts on natural resources, is cleaner and resilient, accounting for natural hazards and the role of environmental management and nature resources in minimising risks.
 - Include a new environmental challenge around preserving the values of the coastal marine area (which will link with Map 9: Marine Natural and Cultural Areas), as follows: Our activities on land – agriculture, forestry, transport, and the growth of urban areas – create pollutants and have altered the state of many of our coastal ecosystems. Our connection to the marine environment through mahinga kai (traditional food gathering practices) and recreation has also been affected. Loss or degradation of ecosystems in the coastal marine area can decrease the benefits we receive from marine habitats in our estuaries and oceans, which include removing sediment and pollutants, mitigating the effects of climate change and providing nursery habitat for taonga species. Changes in marine biodiversity can affect how we value the ocean, and compromise the marine activities we enjoy like boating, fishing, and swimming. The loss or decline of our iconic and taonga species can negatively affect mahinga kai and the intergenerational transfer of mātauranga Māori and kaitiakitanga. We value the marine environment for social, economic, spiritual and cultural reasons and understanding the effects of these activities is crucial for managing our activities and minimising their effects.
 - Include a new environmental challenge as follows: 'Loss and degradation of indigenous biodiversity': Indigenous biodiversity is lost and degraded through pests, land fragmentation, land uses and development. Areas particularly vulnerable to incremental loss and cumulative effects are the ecosystems of wetlands, sand dunes, intact sequences of estuarine-freshwater-land habitats, harbour margins and areas with significance to Māori. Ecosystem services (the benefits we get from healthy ecosystems such as provisioning (e.g. food and fibre), purification and regulating (e.g. air and water purification, flood or climate regulation) supporting (e.g. photosynthesis and nutrient cycling) and cultural (e.g. wairua/spiritual, recreational) services) are often not well understood which can lead to inadequate protection and neglect. The reduction in biodiversity and ecosystem health can affect these services, many of which are essential to our well-being. We must place priority on maintaining, restoring, and enhancing biodiversity.

iv. Include the Climate Resilience principle ' <i>Integrate and enhance local ecosystems and biodiversity</i> ' in the grey integration box within Chapters 05 to 08 and Chapters 10 and 11.	
<p>Advantages</p> <ul style="list-style-type: none"> Addresses the submission points by providing more recognition of the importance of placing priority on protecting the environment, and restoring and enhancing biodiversity Provides a more wholesome description of key environmental challenges. Addresses the submission point on clarification of environmental limits. 	<p>Disadvantages</p> <ul style="list-style-type: none"> Does not address the submission point on including additional environmental growth directives within all the other chapters of the Spatial plan.
Financial implications	
None. No changes are required under this option.	
Other considerations	
Section 109 (1) of the Natural and Built Environment Act prescribed environmental limits must be set in relation to the following aspects of the natural environment: air, indigenous biodiversity, coastal water, estuaries, freshwater, soil, and any other aspect of the natural environment in accordance with the purpose of environmental limits ¹ . Section 111 (1) of the Natural and Built Environment Act states an environmental limit must be expressed as relating to the ecological integrity of an aspect of the natural environment or to human health. The coalition government has repealed the Natural and Built Environment Act and have ceased work on the National Planning Framework, however environmental limits can be included within objectives and policies in instruments such as National Policy Statements (NPS), the regional policy statement and council plans. A limit is a tool that strictly prevents a bottom line being exceeded. Limits must be backed up by regulatory force.	
Option 2B: Not Recommended	
Option 2A and	
<ul style="list-style-type: none"> Insert additional text to include appropriate environmental growth directives within all other chapters of Part 3: The Spatial Plan. 	

¹ NBA (2023) Section 105 1 (a) in relation to ecological integrity, is to prevent the ecological integrity of an aspect of the natural environment from degrading from the state it was in at the commencement of this Part. (b) in relation to human health, is to protect human health.

<p>Advantages</p> <ul style="list-style-type: none"> • As option 2A and • Ensures the environment growth directives are threaded throughout the strategy to address the submission point which promotes placing focus on remedying environmental degradation. 	<p>Disadvantages</p> <ul style="list-style-type: none"> • Inserting environmental growth directives into other chapters that do not currently contain them may create duplication. The growth directives have been drafted to align with the chapter topic but also be considered and implemented in a holistic way. • The Transformational Shift 05 '<i>Restore and enhance eco-systems for future generations</i>' already includes the list of growth directives in the strategy which are aligned to the environment. The purpose of the transformational shifts is to identify areas that are not business as usual components but to reflect the areas that require attention to bring about change. They will provide guidance to the preparation of the Implementation and Funding Plan.
<p>Financial implications</p>	
<p>None. No changes are required under this option.</p>	
<p>Other considerations</p>	
<p>Issue 3: Manage and protect freshwater resources.</p>	
<p>Option 3A: Recommended</p> <ul style="list-style-type: none"> • Provide additional text as follows: <ul style="list-style-type: none"> i. Amend <i>Part 3: The Spatial Plan- Chapter 04 Te Taiao – Our Environment</i> Figure 2 as follows: <ul style="list-style-type: none"> - Amend the blue circle titled 'NPS Freshwater Management' ' and include the text 'Central Government direction' in the associated square box. i. Additional text in <i>Part 3: The Spatial Plan- Chapter 04 Te Taiao – Our Environment –Introduction</i> (after paragraph 4) as follows: 	

- The catchments in the sub-region are areas of land that drain water from the top of surrounding hills down into a river, stream, lake, wetland, estuary or the open coast. Catchments influence the biodiversity and ecology of waterbodies. However, activities on the land in a catchment can impact on water quality and quantity. A healthy water catchment provides high-quality drinking water and supports livelihoods. It also supports local ecosystems so plants, animals, fish and insects that depend on having healthy water can thrive and flourish. We need to continue to ensure that catchment-scale management and enhancement practices are prioritised to create positive outcomes for our environment.
- Rivers and streams provide a range of economic benefits and have important ecological, recreational, aesthetic, and cultural values. Uses of the rivers and streams include municipal and industrial water supply, waste disposal, irrigation, frost protection and hydro-generation. Our rivers, streams, groundwater and wetlands are feeling the pressure of a growing population and land use changes. Water quality has deteriorated in some areas. This is affecting our fish and other aquatic life, drinking water supplies, mahinga kai and how we use water for recreation like swimming and fishing. When we protect the health of freshwater, the health and wellbeing of the wider environment and communities is ensured.

ii. Insert additional text in *Part 3: The Spatial Plan- Chapter 04 Te Taiao – Our Environment -Key Challenges* as follows:

- Additional text in #5 *Achieving Ngā Wai ki Mauao me Maketū* as follows: Catchments are at risk from increased water demand, intensification of industrial, commercial and agricultural activities, increased recreational demand and extreme climatic events. Catchments are dynamic systems and have interactions between freshwater and other environments. Land use planning is critical in managing various land uses in a catchment, thereby minimising conflicts and sustaining water quality and quantity for future generations. Ngā Wai ki Mauao me Maketū is an integrated approach that recognises the interconnectedness of the whole environment, and the interactions between the land, freshwater and the coastal area. Achieving integration can be difficult across a range of agencies and organisations with different functions, responsibilities and priorities. A key challenge will be identifying a suitable scale (e.g., sub-region vs catchment) where integration can be effectively implemented and managing cumulative impacts.
- Additional text in #7 *Implementing NPS Freshwater Management* as follows: Rivers, streams, wetlands, groundwater and geothermal resources contribute significantly to the sub-region's environmental, cultural, economic and social wellbeing. They offer opportunity for wildlife, recreation and amenity, stormwater management and connections between the places we live. Te Mana o te Wai is a fundamental concept focused on restoring and preserving the balance between water (wai), the wider environment (taiao), and people (tāngata), now and in the future. To safeguard the health of these water bodies, we need to ensure they are healthy, resilient and thriving for our community, flora and fauna.

<p>Advantages</p> <ul style="list-style-type: none"> • Addresses some of the submission points. • Includes reference to Te Mana o te Wai. • Additional text in the introduction section will provide a more holistic description of the scope of Te Taiao. This will provide better connection with the subsequent sections of the chapter, and Chapter 9 'Three Waters and other infrastructure' and its growth directives. • Additional text in the key challenges section will better describe the challenges which catchments are currently facing. 	<p>Disadvantages</p> <ul style="list-style-type: none"> • Does not address the submission points around identifying whether there is sufficient water supply for a growing population and the need to collect data that will indicate whether Te Taiao can accommodate the current municipal water take and future municipal take. However, the matter of how the management of water across the Western Bay of Plenty sub-region is planned is addressed further in the Infrastructure background paper (see commentary below) and addressed in the Infrastructure Issues and Options paper. • Does not address the submission points regarding whether there is a challenge of implementing Te Mana o te Wai and the NPS-FM with the predicted urban growth, and a collaborative approach to understanding how the sub-regions Māori land trusts with horticultural/agricultural/energy interests (dependent on freshwater) could be impacted by restricted access because of urban growth. However, these points are essentially addressed in Chapter 9 Three Waters and Other Infrastructure and the chapter's growth directives 1 and 2.
<p>Financial implications</p>	
<p>None. No changes are required under this option.</p>	
<p>Other considerations</p>	
<p>Policy 1 of the NPS-FM seeks that freshwater is managed in a way that gives effect to Te Mana o te Wai. Te Mana o te Wai is about restoring and preserving the balance between the water, the wider environment, and the community. The requirement for integrated management is embedded in the NPS-FM (Section 3.5). This requires authorities that share jurisdiction over a catchment to co-operate in the integrated management of the effects of land use and development on freshwater. Authorities must also recognise the interconnectedness of the whole environment, and the interactions between freshwater and other environments. The coalition government has recently announced the intention to review the National Policy Statement for Freshwater Management 2020 (NPS-FM) to rebalance Te Mana o te Wai to better reflect the interests of all water users and enable councils more flexibility in how they meet environmental limits. The government will be seeking advice on how to exempt councils from obligations under the NPS-FM as soon as practicable.</p> <p>The SmartGrowth Strategy Infrastructure background paper (September 2023) refers to the Terms of Reference which was signed in April 2022 between Tauranga City Council (TCC), Bay of Plenty Regional Council and Western Bay of Plenty District Council (WBOPDC) with the goal of establishing a clear</p>	

understanding of resources available for municipal water supply and to develop a plan regarding how these resources may be sustainably utilised moving forward to provide municipal water to communities in the western Bay of Plenty in the short to medium term. Initial analysis work has been completed. Based on the outcomes of the work to date there has been ongoing and regular collaboration between the partners to understand and resolve sub-regional water supply challenges. TCC and WBOPDC are in the process of co-developing a 30-year Water Supply Strategy which will address long-term needs of the sub-region to give effect to Te Mana o Te Wai and the NPS-FM. The strategy will inform investments, plans and policy decisions required to support planned growth in the sub-region.

Option 3B: Not Recommended

Option 3A
and:

- Include an additional growth directive in *Part 3: The Spatial Plan- Chapter 04 Te Taiao Our Environment* to refer to: The vital importance of clean, healthy water is recognised and the health and well-being of waterbodies, freshwater ecosystems and their catchments are valued, protected, and restored.

Advantages

- Option 3A advantages and;
- Reflects the growing understanding of water as a precious resource.
- May help the consideration and implementation of the concept of Te Mana o te Wai in the Implementation and Funding Plan priorities, actions/initiatives.

Disadvantages

- As option 3A and;
- An additional growth directive may result in a duplication of direction. The existing environment growth directive in Chapter 04- '*A full range of ecosystems in the western Bay of Plenty are maintained or restored to a healthy, functioning state*' – captures all ecosystems, including freshwater ecosystems.
- Central Government direction is not yet clear on any changes to freshwater management and implementation of Te Mana o te Wai

Financial implications

N/A

Other considerations

Recommended Decisions

Issue 1: Poor air quality

Option 1A:

Provide additional text in Part 3: *Chapter 04 – Te Taiao Our Environment* as follows:

- Include text that recognises the issue of poor air quality amongst other environmental management issues:
 - i. Amend and insert additional wording in Figure 2 as follows:
 - Insert a new circle titled “Environmental management” with the following associated bullet points in a text box:
 - Mount Maunganui airshed management plan
 - BOPRC monitoring programmes
 - Local Spatial Plan actions
 - Travel Demand management/behavioural change programmes
 - Iwi and hapū management plans
 - Regional Policy Statement
 - Regional Plans
 - ii. Insert additional wording in the *Part 3: The Spatial Plan- Chapter 04 Te Taiao – Our Environment, Key Challenges* to include a new challenge as follows: ‘Effect of existing activities and intensification on our environment’: Our environment is polluted when substances or kinds of energy (noise, light, heat) enter it and cause harm. Although some pollutants occur naturally, in urban areas pollution comes mostly from human activities (such as industry, agriculture, urban development and transport) and can accumulate to harmful levels in air, land, freshwater, and marine environments. Pollutants can move in the air, in water, and through soil, often over large distances and long periods of time. Pinpointing the cause of pollution can be difficult. Some pollution comes from one place (e.g. emissions from a factory) while other pollution has many sources (e.g. vehicle emissions or agriculture practices). Pollution has a major effect on our environment, harming our ecosystems and our relationship with nature, and posing risks to human health. We need to manage the impact of pollution on people’s health and the environment, and improve environmental, cultural and social well-being outcomes.

Ensure the Implementation and Funding Plan recognises the SmartGrowth partnership, Ministry for the Environment and Te Whatu Ora continues to work alongside mana whenua, iwi, businesses, other stakeholders and community

groups to enhance the effectiveness of environmental management plans and programmes and identify future aspirations around addressing the effects of polluting activities.

Reasons for recommendation:

The Strategy currently does not contain sufficient recognition of the issue of poor air quality. The option will go some way to addressing submitters' concerns and it will acknowledge the effect of emitting activities on people, communities and the environment and the need to manage the impact of pollutants.

Figure 2 does not currently include reference to the variety of 'environmental management' plans, strategies and work programmes, which include air quality, and the recognition of environmental management plans and programmes in the Implementation and Funding Plan and the need for continued collaborative working amongst partners will also help address submitters concerns.

Issue 2: Impact of growth on the environment

Option 2A:

Provide additional text in Part 3: *Chapter 04 – Te Taiao Our Environment* as follows:

- Insert additional text in *Part 3: The Spatial Plan- Chapter 04 -Te Taiao Our Environment* - Introduction as follows: Underpinning these values is the fundamental principle that growth accommodation must be within the environmental limits set through Ngā Wai ki Mauao me Maketu, which recognises
- Include the following definition in the Appendix as follows: Environmental Limit: The level of some environmental pressure, indicator of environmental state or benefit derived from the natural resource system, beyond which conditions are deemed to be unacceptable in some way.
- Insert additional text in *Part 3: The Spatial Plan- Chapter 04 Te Taiao Our Environment -Key Challenges* as follows:
 - Amend the environmental challenge #1 *Natural Resource Limits*, as follows: As our sub-region grows, the pressure on the environmental resources increases. In particular, managing natural hazards, protecting highly productive land and managing water. Many of the sub-region's resources are facing growing pressures. Successive reports show that pressure on our climate, waterways, marine environment and land is mounting. As a sub-region, we need to invest back into the environment more than what we take out. This is an on-going challenge when the sub-

region has high growth rates. We need to ensure that growth is cognisant of the impacts on natural resources, is cleaner and resilient, accounting for natural hazards and the role of environmental management and nature resources in minimising risks. ,

- Include a new environmental challenge as follows: *'Preserving the values of the coastal marine area'*: Our activities on land – agriculture, forestry, transport, and the growth of urban areas – create pollutants and have altered the state of many of our coastal ecosystems. Our connection to the marine environment through mahinga kai (traditional food gathering practices) and recreation has also been affected. Loss or degradation of ecosystems in the coastal marine area can decrease the benefits we receive from marine habitats in our estuaries and oceans, which include removing sediment and pollutants, mitigating the effects of climate change and providing nursery habitat for taonga species. Changes in marine biodiversity can affect how we value the ocean, and compromise the marine activities we enjoy like boating, fishing, and swimming. The loss or decline of our iconic and taonga species can negatively affect mahinga kai and the intergenerational transfer of mātauranga Māori and kaitiakitanga. We value the marine environment for social, economic, spiritual and cultural reasons and understanding the effects of these activities is crucial for managing our activities and minimising their effects.

- Include a new environmental challenge as follows: *'Loss and degradation of indigenous biodiversity'*: Indigenous biodiversity is lost and degraded through pests, land fragmentation, land uses and development. Areas particularly vulnerable to incremental loss and cumulative effects are the ecosystems of wetlands, sand dunes, intact sequences of estuarine–freshwater–land habitats, harbour margins and areas with significance to Māori. Ecosystem services (the benefits we get from healthy ecosystems such as provisioning (e.g. food and fibre), purification and regulating (e.g. air and water purification, flood or climate regulation) supporting (e.g. photosynthesis and nutrient cycling) and cultural (e.g. wairua/spiritual, recreational) services) are often not well understood which can lead to inadequate protection and neglect. The reduction in biodiversity and ecosystem health can affect these services, many of which are essential to our well-being. We must place priority on maintaining, restoring, and enhancing biodiversity.

- Include the Climate Resilience principle *'Integrate and enhance local ecosystems and biodiversity'* in the grey integration box within Chapters 05 to 08 and Chapters 10 and 11.

Reasons for recommendation:

Addresses the submission points about providing more emphasis on the importance of protecting the environment and integrating and enhancing local ecosystems and biodiversity.

Provides a definition of environmental limits; provide a more wholesome description of the key environmental challenges the sub-region is facing.

Issue 3: Manage and protect freshwater resources

Option 3A:

Provide additional text in Part 3: *Chapter 04 – Te Taiao Our Environment* as follows:

- Amend Figure 2 as follows:
 - Amend the blue circle titled 'NPS Freshwater Management' to include the text 'Central Government Direction' in the associated square box.
- Insert additional text in *Part 3: The Spatial Plan- Chapter 04 Te Taiao – Our Environment –Introduction* (after paragraph 4) as follows: The catchments in the sub-region are areas of land that drain water from the top of surrounding hills down into a river, stream, lake, wetland, estuary or the open coast. Catchments influence the biodiversity and ecology of waterbodies. However, activities on the land in a catchment can impact on water quality and quantity. A healthy water catchment provides high-quality drinking water and supports livelihoods. It also supports local ecosystems so plants, animals, fish and insects that depend on having healthy water can thrive and flourish. We need to continue to ensure that catchment-scale management and enhancement practices are prioritised to create positive outcomes for our environment.
 - Rivers and streams provide a range of economic benefits and have important ecological, recreational, aesthetic, and cultural values. Uses of the rivers and streams include municipal and industrial water supply, waste disposal, irrigation, frost protection and hydro-generation. Our rivers, streams, groundwater and wetlands are feeling the pressure of a growing population and land use changes. Water quality has deteriorated in some areas. This is affecting our fish and other aquatic life, drinking water supplies, mahinga kai and how we use water for recreation like swimming and fishing. When we protect the health of freshwater, the health and wellbeing of the wider environment and communities is ensured.
- Insert additional text in *Part 3: The Spatial Plan- Chapter 04 Te Taiao – Our Environment –Key Challenges* as follows:

- Additional text in Key Challenge #5 *Achieving Ngā Wai ki Mauao me Maketū* as follows: Catchments are at risk from increased water demand, intensification of industrial, commercial and agricultural activities, increased recreational demand and extreme climatic events. Catchments are dynamic systems and have interactions between freshwater and other environments. Land use planning is critical in managing various land uses in a catchment, thereby minimising conflicts and sustaining water quality and quantity for future generations. Ngā Wai ki Mauao me Maketū is an integrated approach that recognises the interconnectedness of the whole environment, and the interactions between the land, freshwater and the coastal area. Achieving integration can be difficult across a range of agencies and organisations with different functions, responsibilities and priorities. A key challenge will be identifying a suitable scale (e.g., sub-region vs catchment) where integration can be effectively implemented and managing cumulative impacts.

- Additional text in Key Challenge #7 *Implementing NPS Freshwater Management* as follows: Rivers, streams, wetlands, groundwater and geothermal resources contribute significantly to the sub-region's environmental, cultural, economic and social wellbeing. They offer opportunity for wildlife, recreation and amenity, stormwater management and connections between the places we live. Te Mana o te Wai is a fundamental concept focused on restoring and preserving the balance between water (wai), the wider environment (taiao), and people (tāngata), now and in the future. To safeguard the health of these water bodies, we need to ensure they are healthy, resilient and thriving for our community, flora and fauna.

Reasons for recommendation:

Additional text in the introduction section to describe catchment management/enhancement and freshwater resources will provide a more holistic description of the scope of Te Taiao and will align better with Figure 1 *Scope of Te Taiao – Our Environment*. Additional text in the Key Challenges section will help to address the submissions by describing some of the challenges facing catchments and the need to recognise the interconnectedness of the whole environment.

Including a reference to the concept of Te Mana o te Wai in this chapter will create a better connection to the subsequent references in *Chapter 09 Three Waters and other Infrastructure*.

Decision

(To be completed in the decision-making meeting)

Reason

(To be completed in the decision-making meeting)

Date approved:

Approved by: